

GW - 14

**INSPECTIONS &
DATA**

Chavez, Carl J, EMNRD

To: Chavez, Carl J, EMNRD
Subject: Lovington Refinery (GW-014) Note to File "Inspections"

Director announced that travel was being restricted for inspections with no overnights allowed until further notice.

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3490
Fax: (505) 476-3462
E-mail: CarlJ.Chavez@state.nm.us
Website: <http://www.emnrd.state.nm.us/ocd/index.htm>
(Pollution Prevention Guidance is under "Publications")

Inspector: Carl Chavez
Navajo Refining Company Lovington Refinery March 14, 2008



Driving South looking SW arriving at refinery



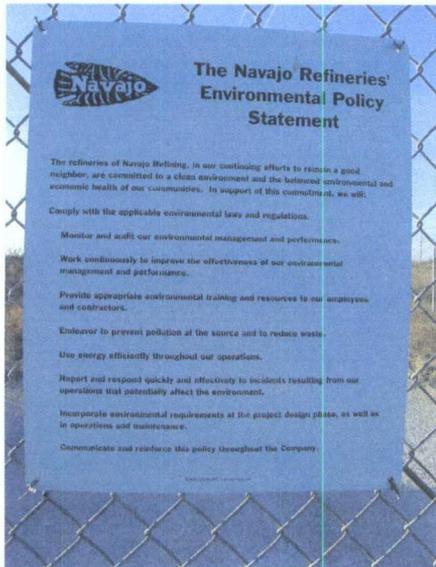
Looking SW at diesel fuel tank batteries



Looking due west from gate entry point.



Office where meeting was held



Entrance to refinery.



Chemical storage area w/ secondary containment

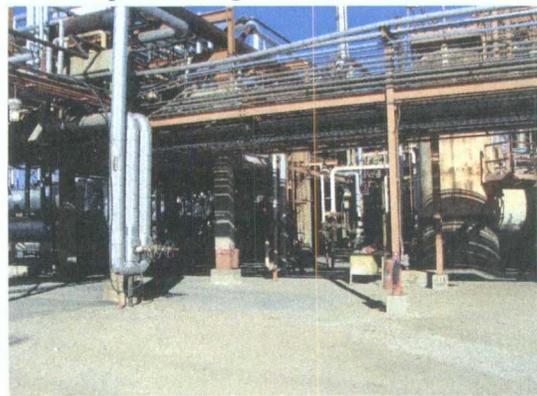
Inspector: Carl Chavez
Navajo Refining Company Lovington Refinery March 14, 2008



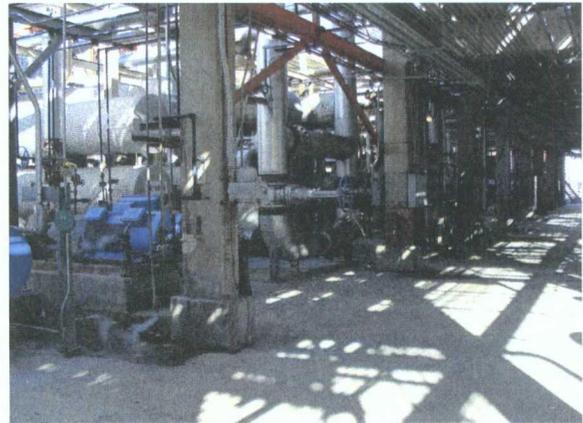
Chemical storage area w/ secondary containment



Close-up of storage area



Process area with process drainage



Close up of process area

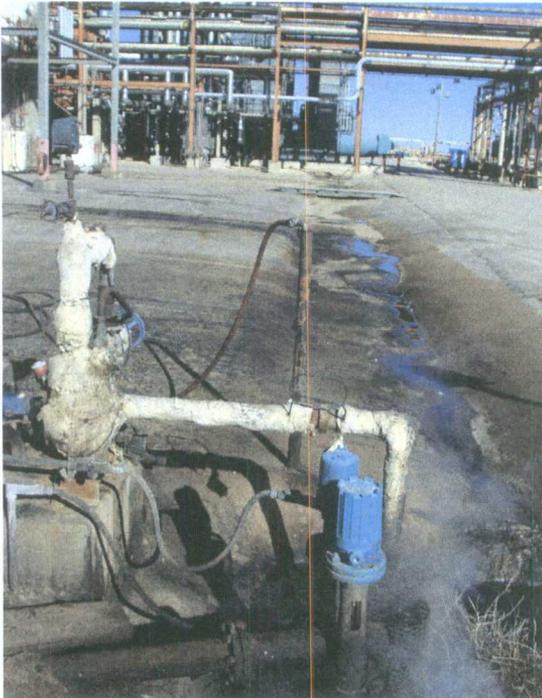


Closed sump storm water collection area w/ re-route to treatment system

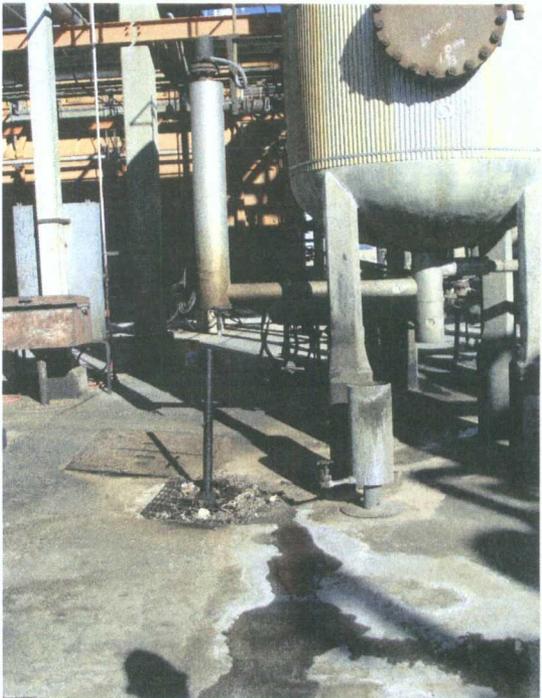


Housekeeping issue (debris in drain) evident along with cold weather conditions

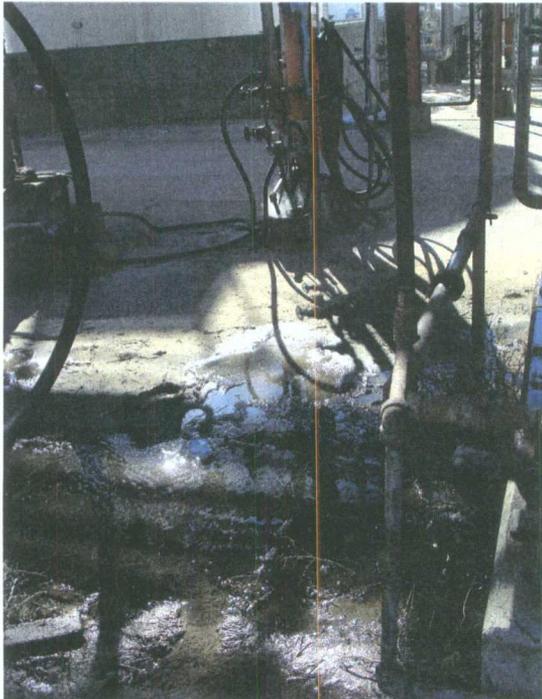
Inspector: Carl Chavez
Navajo Refining Company Lovington Refinery March 14, 2008



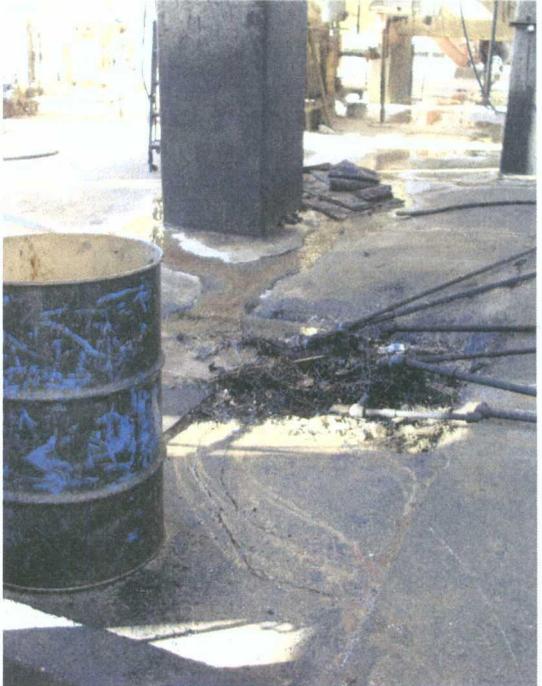
Same as photo above looking east



Drainage in the process area w/ route back to API Separator



Drainage in process area



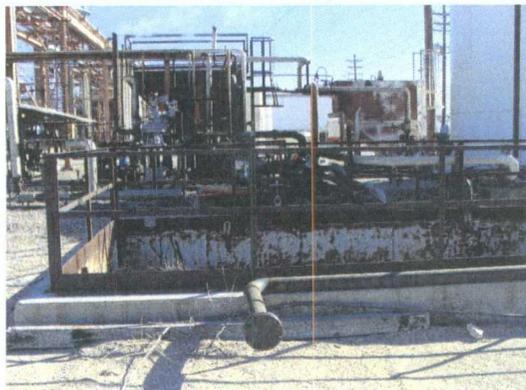
Housekeeping issue- debris in closed sump drain

Inspector: Carl Chavez
Navajo Refining Company Lovington Refinery March 14, 2008

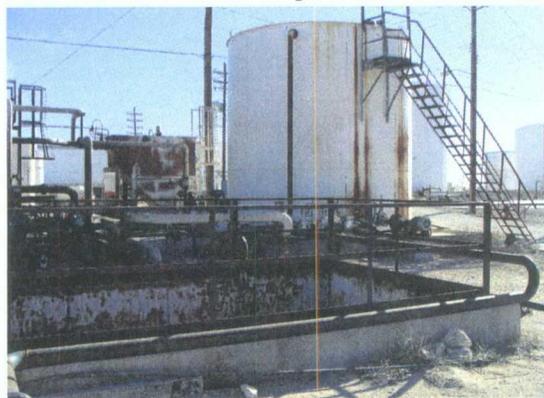


Process area w/ secondary containment

Process area w/ secondary containment



Abandoned oil API Separator Cells



Abandoned Old API Separator Cells



Inside Old API Separator Cell



Closed Sump

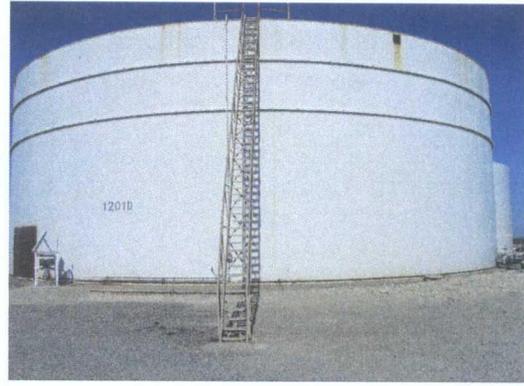


Chemical tote positioned over secondary containment

Inspector: Carl Chavez
Navajo Refining Company Lovington Refinery March 14, 2008



Soil staining around pump pushing fluids to tanks



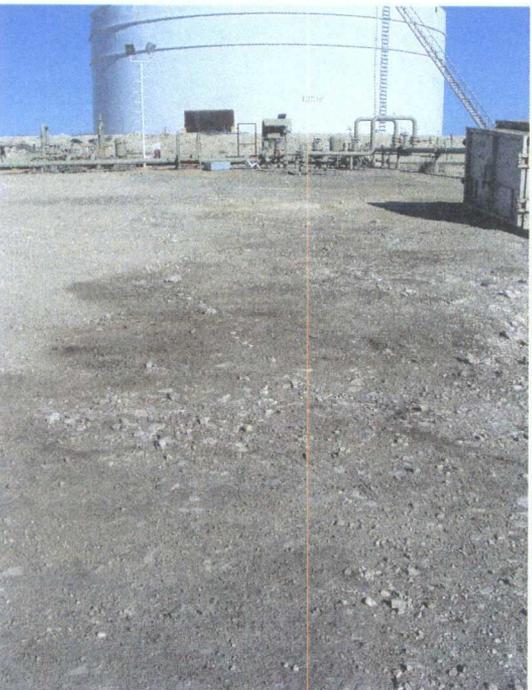
Close-up Tk 1201D



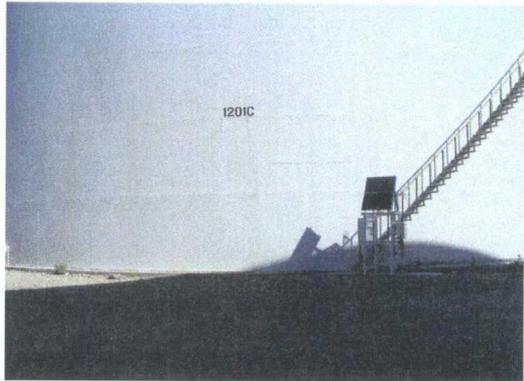
C-141 Release of Diesel from Tk 1201D



Close-up around Tk 1201D

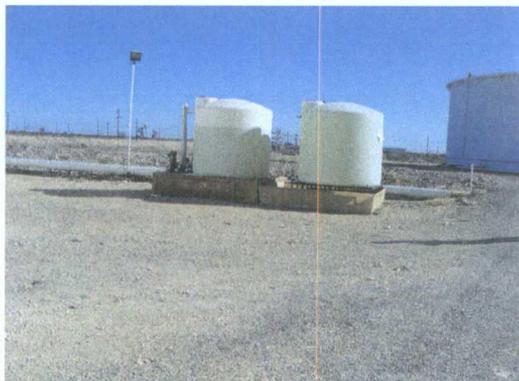


C-141 Release of Diesel from Tk 1201D



Tk 1201C Close-up

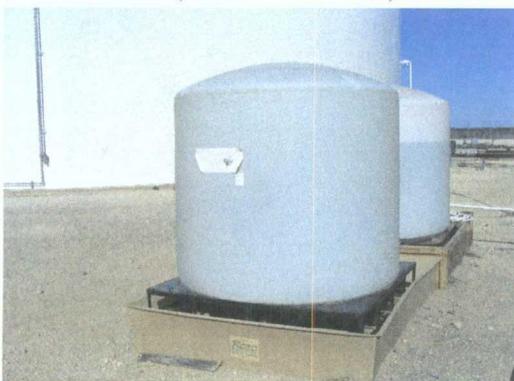
Inspector: Carl Chavez
Navajo Refining Company Lovington Refinery March 14, 2008



Chemical storage tanks over secondary containment (1+1/3 vol. issue)



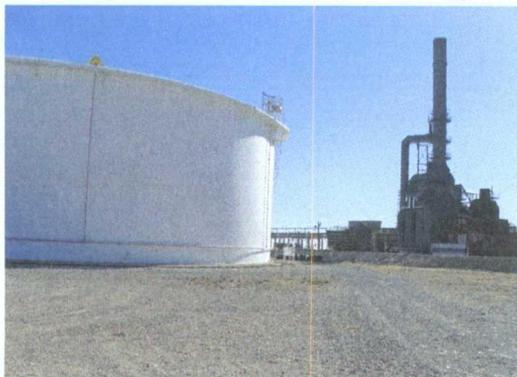
Tk perimeter close-up



Close-up of Tks (1 +1/3 vol. issue?)



Drums (cleaner chemical) temporarily stored within bermed unlined area during Tk cleaning

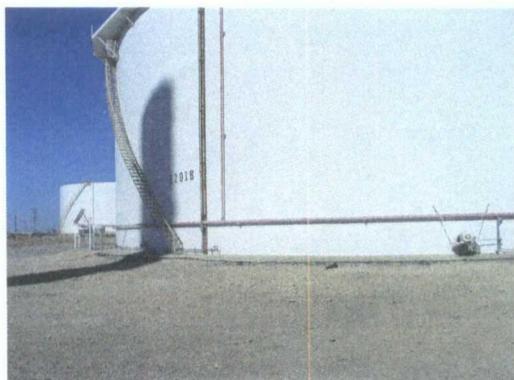


Tank photo w/ FCC in background?

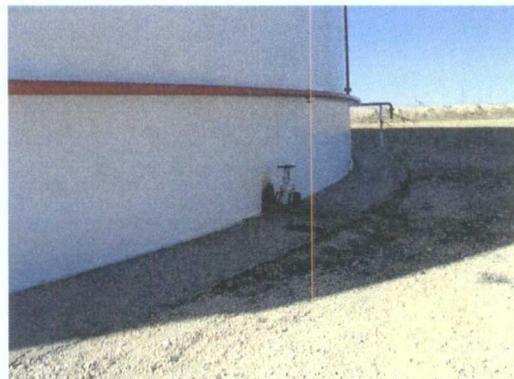


Close-up of drums (cleaner chemical) temporarily stored within bermed area lacking liner?

Inspector: Carl Chavez
Navajo Refining Company Lovington Refinery March 14, 2008



Close-up of tanks w/ berms surrounding tanks (1+1/3 vol. containment)



Close-up around Tk perimeter



Tank cleaner drums temporarily stored



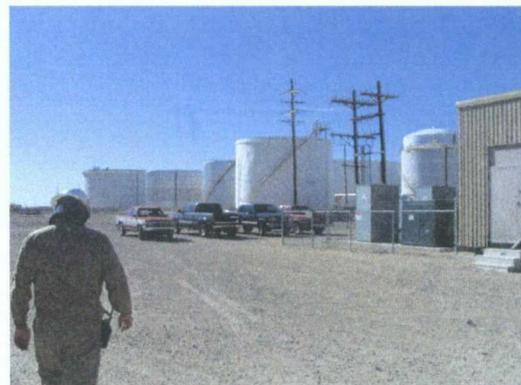
Tank cleaner drums w/ roll-off waste containers in background



Tank being cleaned

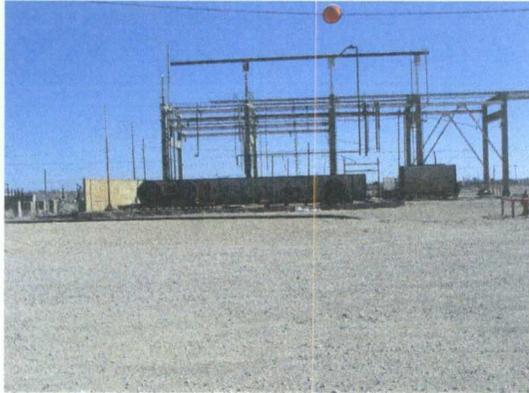


Distillation tower in process area

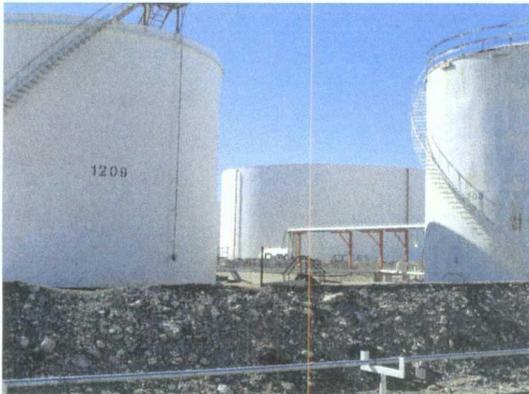


Looking South at tanks

Inspector: Carl Chavez
Navajo Refining Company Lovington Refinery March 14, 2008



Base of flare stack West side of property



Bermed tanks



API Separator area



Flare stack (> 150 ft. of non-vegetation zone for fire watch)

Notes: It appears that secondary containment liners within tank bermed areas are lacking. Refinery says they bermed entire perimeter of property in the event of a release (revisit this issue during DP renewal in 2008 and subsequent inspections). Possible issue w/ storm water run-off and overflow of releases onto non-process or stormwater drainage areas and lack of controls to prevent releases to stormwater, i.e., process area drainage to contain spills and route back to API Separator. Some housekeeping issues w/ debris in closed sump drains and process area drains.

Inspector: Carl Chavez
Navajo Refining Company Lovington Refinery December 15, 2007



Photo of railroad corridor running N - S



Chemical storage area w/ secondary containment



Process area



Soil staining in process area



Process area



Discolored soils stockpiled on ground

Inspector: Carl Chavez

Navajo Refining Company Lovington Refinery December 15, 2007



Discolored soils stockpiled on ground

Notes: Some discolored soils in process area needed to be cleaned up. Required operator to remove discolored soils to permitted OCD facility and noted potential violation.



REFINING COMPANY, LLC

FAX

(575) 746-5283 DIV. ORDERS
(575) 746-5481 TRUCKING
(575) 746-5458 PERSONNEL

501 EAST MAIN STREET • P. O. BOX 159
ARTESIA, NEW MEXICO 88211-0159
TELEPHONE (575) 748-3311

FAX

(575) 746-5419 ACCOUNTING
(575) 746-5451 ENV/PURCH/MKTG
(575) 746-5421 ENGINEERING

April 8, 2008

Mr. Carl Chavez
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division
Environmental Bureau
1220 South St. Francis Dr.
Santa Fe, New Mexico 87505

2008 APR 9 PM 1 01
RECEIVED

RE: March 14, 2008 OCD Inspection Follow-Up or Clarification Items

Dear Mr. Chavez,

On March 24, 2008, Navajo Refining Company (Navajo) received an e mail from you asking for follow-up on several items relating to the discharge permit for our Lovington facility. Below, I have answered each item in order.

- 1) **Item 3 (Drum Storage):** *“All drums containing materials other than fresh water must be stored on an impermeable pad with curbing.” The OCD noticed that an impermeable centralized pad area was constructed to store chemicals; however, there are plans to construct another impermeable pad area adjacent to the existing one to separate incompatible chemicals. Please provide the anticipated date of construction of the new impermeable pad along with a drawing that reflects the existing and new central pad storage areas. Also, any plans of new or anticipated expansion at the refinery should also be submitted to the OCD for review.* The new pad will be constructed during the summer of 2008. The drawings for that pad are not finalized as yet but will be forwarded to OCD when they are completed. We have attached a drawing of the existing pad for your review. This drawing is very simple. The drawing for the new pad will be much more detailed.

There are currently no plans for expansion of the Lovington Refinery.

- 2) **Item 5 (Above Ground Tanks):** *“All new facilities or modifications to existing facilities must place the tank on an impermeable pad within the*

berm.” The OCD informed Navajo Personnel that under the new permit, existing tanks containing chemicals or new tanks containing chemicals will need to be retrofitted or constructed with impermeable pads to satisfy new discharge permit conditions; however, the OCD will work with Navajo to request a schedule from Navajo identifying the tanks and phases for completing the above.

No response required

- 3) ***Item 8 (Below Grade Tanks/Sumps): Please provide proof of test data for sumps, since 2002. “All pre-existing sumps and below-grade tanks must be tested to demonstrate their mechanical integrity no later than December 15, 2002. and every year from tested date, thereafter.”***
Navajo has enclosed inspection results spreadsheets and hydrotest sheets used by our maintenance department. After the February 19-21, 2007 OCD inspection in Artesia, spreadsheets were updated to include repair information and installation dates or date ranges, where known, and the addition of a “pass/fail” section at both facilities. Before that time, testing was done and any failures were repaired.
- 4) ***Item 9 (Underground Process/Wastewater Lines): Please provide 2007 test data for process and wastewater lines. “All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity no later than December 15, 2002, and every 5 years, from tested dated, thereafter.”*** Navajo has enclosed inspection results spreadsheets and hydrotest sheets used by our maintenance department. The underground process/wastewater lines at Lovington were tested in 2005 and early 2006. The next tests on that 5 year cycle will be started in 2010.
- 5) ***Item 10 (Class V Wells): Please provide proof of permit application and correspondence with NMED for septic system at the refinery. “Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.”*** There has not been a permit application made to the New Mexico Environment Department yet. We have had preliminary talks with John Wells in the Roswell office. Currently, we are in the process of moving the control room at Lovington into the main office building which will impact the number and size of systems needed. We will then send a Corrective Action Plan to Mr. Wells for his approval.
- 6) ***Item 12 (Spill Reporting): Please provide copies of all C-141 spill releases, since October 31, 2002. Identify releases where contamination was left in place or not removed as part of the spill release response. The OCD looked at the last C-141 incident near Tank 1201D where the sump leaked and diesel was released onto the ground migrating westward. Navajo informed the OCD that it recovered standing fluids,***

but left the contaminated soil in place so as not to exacerbate the contamination due to the cobbly sediment nature of the ground throughout the refinery. Leaving contaminated soil or sediment in place is not an acceptable practice for dealing with releases. Spills are generally cleaned up using visual, olfactory, field PID and final samples (base and sidewalls of excavation) collected and sent to a lab for confirmation that the release was properly cleaned up. The OCD may require further corrective actions based on the C-141s requested above.

Navajo would like to clarify in writing what was discussed with you at the time of the inspection concerning the spill south of 1201 D. The sump was overrun by crude oil. Navajo responded to this spill immediately and used a vacuum truck to pick up standing fluid. We then used a front end loader and picked up **5 roll-off bins of contaminated dirt** (approx. 100 yds) from the area. We stated that, due to the rocky nature of the underlying material, it would be extremely difficult, if not impossible, to remove the contaminated rock due to its massive lithology. If we dig up the rock we would lose any protection this massive layer gives us in regard to the underlying sand. In effect, we would "create" a pathway for the contamination into the Ogalalla (which is the water bearing formation). In our opinion, removing the contaminated top soil and letting the sun and wind remediate the rock below is the much better, and frankly, more environmentally safe alternative. The contamination that was left on the underlying rock is minimal.

We have enclosed all C-141's from Lovington since October 31, 2002.

- 7) *Item 13 (Waste Disposal): Please provide any new waste streams as part of the permit renewal and future expansion plans for the refinery. We have enclosed a list of all waste streams from the refinery.*
- 8) *Item 14 (OCD Inspections): Please ensure that there is a minimum one-hundred feet radius non-vegetation zone around the flare stack(s) at the refinery- especially now that the windy season has arrived in SE New Mexico. This item is being looked into. We believe that there is currently a 100 ft. radius around our flare. If not, we will ensure that this is maintained.*
- 9) *Item 18 (Vadose Zone and Water Pollution): Please provide ground water monitoring reports from MWs at the refinery, since the "Groundwater Monitoring & Remediation System Performance Report July 2001 – June 2002." This appears to be the last groundwater monitoring report submitted by Navajo to the OCD? Those reports are attached.*
- 10) *Record keeping is not specified in the existing discharge permit, but will be included in the permit renewal. Please transfer the Lea Refinery*

records from the Artesia Refinery to the Lea Refinery so they will be onsite for inspections, etc. from now on. We will make copies of the pertinent records and have them on file at Lovington.

If there are any questions concerning this submission, please do not hesitate to call me at 575-746-5281.

Sincerely,
NAVAJO REFINING COMPANY, LLP



Darrell Moore
Environmental Manager for Water and Waste

Encl.

Cc: Johnny Lackey, Environmental Manager
Jim Resinger, Vice President-Navajo Refinery

File: Lovington Discharge Permit Lov 5E4B



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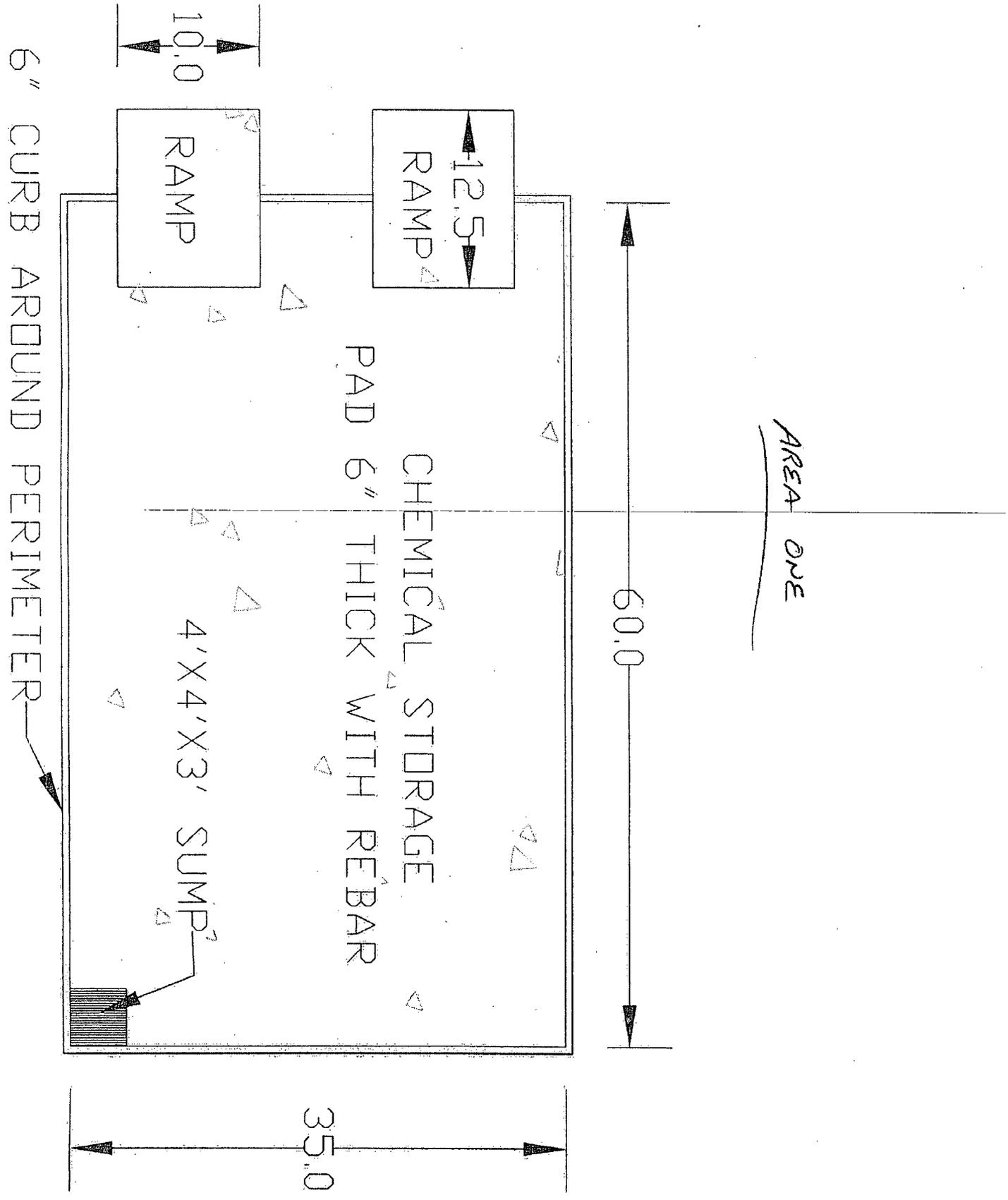


Darrell Moore
Environmental Manager for Water and Waste

Encl.

Cc: Johnny Lackey, Environmental Manager
Jim Resinger, Vice President-Navajo Refinery

File: Lovington Discharge Permit Lov 5E4B



FILE COPY

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 South First, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Form C-141
Revised March 17, 1999

Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company Navajo Refining Co. LLC		Contact Darrell Moore
Address 7406 S. Main Lovington, NM		Telephone No. 575-746-5281
Facility Name Lovington Refinery		Facility Type Petroleum Refinery
Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County

NATURE OF RELEASE

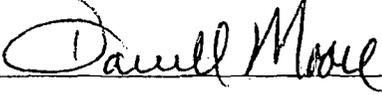
Type of Release Crude Oil	Volume of Release Unknown	Volume Recovered 2 bbls
Source of Release Hole in pipeline	Date and Hour of Occurrence Unknown	Date and Hour of Discovery 10/25/07 10:00am
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Larry Johnson; Hobbs OCD, Wayne Price Santa Fe, OCD	
By Whom? Darrell Moore	Date and Hour 3:30 pm 10/25/07	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* A pool of oil was noticed along a piperrun. Upon investigation, a hole was discovered in a pipe. The pipe was excavated and clamped.

Describe Area Affected and Cleanup Action Taken.* 20 yds of contaminated soil has been removed to uncover the pipe. The vertical limit has not been reached and the location within the pipe run makes it difficult to clean under it.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 	OIL CONSERVATION DIVISION	
Printed Name: Darrell Moore	Approved by District Supervisor:	
Title: Env. Mgr for Water & Waste	Approval Date:	Expiration Date:
Date: 10/25/07 Phone: 575-746-5281	Conditions of Approval:	Attached <input type="checkbox"/>

* Attach Additional Sheets If Necessary

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 South First, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

FILE COPY

Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Form C-141
Revised March 17, 1999
Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company Navajo Lea Refining Co. LLC		Contact Darrell Moore
Address 7406 S. Main Lovington, NM		Telephone No. 575-748-3311
Facility Name Lovington Plant		Facility Type Petroleum Refinery
Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County

NATURE OF RELEASE

Type of Release Crude Oil	Volume of Release 20 bbls	Volume Recovered 5 bbls
Source of Release Sump at pipeline	Date and Hour of Occurrence 10/10/07 8:00am	Date and Hour of Discovery 10/10/07 8:00am
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Hobbs OCD voicemail-on call phone	
By Whom? Doug Price	Date and Hour 10/10/07 9:05am	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* During switching from one crude tank to the other, relief valve released filling up sump and overrunning. Vacuum was used to suck up free oil.

Describe Area Affected and Cleanup Action Taken.* Area affected is in two areas of about 10' wide by 100' long each. Contaminated soil has been picked up and bottom hole TPH samples taken. Waiting on results

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: <i>Darrell Moore</i>	OIL CONSERVATION DIVISION	
Printed Name: Darrell Moore	Approved by District Supervisor:	
Title: Env. Mgr. for Waste & Water	Approval Date:	Expiration Date:
Date: 10/18/07 Phone: 575-748-3311	Conditions of Approval:	Attached <input type="checkbox"/>

* Attach Additional Sheets If Necessary

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised October 10, 2003

Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

OPERATOR Initial Report Final Report

Name of Company <u>Lea Refining Co.</u>	Contact <u>Darrell Moore</u>	
Address	Telephone No. <u>505-746-5281</u>	
Facility Name	Facility Type <u>Refinery</u>	
Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
-------------	---------	----------	-------	---------------	------------------	---------------	----------------	--------

Latitude: 32°52'38"N Longitude: 103°18'00"W

NATURE OF RELEASE

Type of Release <u>Naptha-Kerosene</u>	Volume of Release <u>Unknown</u>	Volume Recovered <u>30bbbls</u>
Source of Release <u>Run Down Line</u>	Date and Hour of Discovery <u>10/12/05</u>	Date and Hour of Discovery <u>10/12/05</u>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <u>Larry Johnson OCD</u>	
By Whom? <u>Darrell Moore</u>	Date and Hour <u>10/13/05 8:30am</u>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* Line developed leak. Leak was clamped off and free standing product was vacuumed up. Line is being inspected for potential pipe replacement.

Describe Area Affected and Cleanup Action Taken.* Affected area is near the RO Unit and under pipe rack. Crew will remove contaminated dirt which will be profiled for disposal. Bottom samples will be analyzed.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: <u>Darrell Moore</u>	OIL CONSERVATION DIVISION	
Printed Name: <u>Darrell Moore</u>	Approved by District Supervisor:	
Title: <u>Env. Mgr. for Water & Waste</u>	Approval Date:	Expiration Date:
E-mail Address: <u>darrell.moore@navajo-refining.com</u>	Conditions of Approval:	Attached <input type="checkbox"/>
Date: <u>10/14/05</u>	Phone: <u>505-746-5281</u>	

* Attach Additional Sheets If Necessary

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 South First, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Form C-141
Revised March 17, 1999

Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

OPERATOR

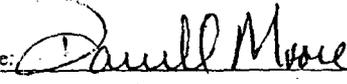
Initial Report Final Report

Name of Company Navajo Refining - Lea	Contact Darrell Moore	
Address P.O. Drawer 159 Artesia, NM	Telephone No. 505-748-3311	
Facility Name	Facility Type	
Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County

NATURE OF RELEASE

Type of Release Diesel	Volume of Release 70 bbls.	Volume Recovered 30 bbls.
Source of Release Relief valve	Date and Hour of Occurrence 12/7/03 4:00 am	Date and Hour of Discovery 12/7/03 4:00 am
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? E.L. Gonzalez	
By Whom? Darrell Moore	Date and Hour 12/7/03 1:00 pm	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	
If a Watercourse was Impacted, Describe Fully.*		
Describe Cause of Problem and Remedial Action Taken.* Relief valve was left open. When pump was kicked on, the release occurred.		
Describe Area Affected and Cleanup Action Taken.* Area is near TK103B. Vacuum truck picked up 30bbls. Liquid. 100yds. of contaminated soil was removed and shipped to CRI. Bottom hole samples have been collected. Awaiting results.		
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.		
Signature: 	OIL CONSERVATION DIVISION	
Printed Name: Darrell Moore	Approved by District Supervisor:	
Title: Env. Mgr. for Water & Waste	Approval Date:	Expiration Date:
Date: 12/17/03 Phone: 505-748-3311	Conditions of Approval:	Attached <input type="checkbox"/>

* Attach Additional Sheets if Necessary

MAYAGD REFINING COMPANY
 LITHIUM OIL REFINERY
 LISTING OF ALL Sumps

Date: 3, 2002

NO OF Sumps	TYPE	LOCATION	DESCRIPTION	APPROX DIMENSIONS	LAST TEST DATE	NEXT TEST DUE	TEST PASS/FAIL	TESTED BY	TEST METHOD	REPAIR METHOD	COMMENT
1	ASSUMPTO	EAST OF COOLING TOWER NORTH OF BACK 6 E-24	CONCRETE BOX	4' X 4' X 3' 1/2'	6/1/2004	N/A			HYDROCHECK LEVEL		(OUT OF SERVICE) Q&B ROUSSEAU HUB ON LIT STATION
2	ASSUMPTO	AT OLD BIRNICK CLEANING PAD	CONCRETE BOX	4' X 4' X 3' 1/2'	N/A	N/A			HYDROCHECK LEVEL		(OUT OF SERVICE) Sump 2 ABOVE AND CAP
3	ASSUMPTO	AT CHEMICAL STORAGE PAD	CONCRETE BOX	4' X 4' X 4'	11/21/2007	6/1/2009	PASS	GLES, INC.	HYDROCHECK LEVEL		TEST Sump #204
4	ASSUMPTO	SOUTH OF 400 & 401 CAUSTIC TANKS	CONCRETE BOX	4' X 4' X 4'	11/21/2007		PASS	GLES, INC.	HYDROCHECK LEVEL		TEST Sump
5	ASSUMPTO	AT NORTHERLY PAD	CONCRETE BOX	4' X 4' X 4'	11/21/2007		PASS	GLES, INC.	HYDROCHECK LEVEL		TEST Sump
6	ASSUMPTO	AT BIRNICK CLEANING PAD	CONCRETE BOX	10' X 20' X 3'	11/21/2007		PASS	GLES, INC.	HYDROCHECK LEVEL		(OUT OF SERVICE) BACK FILL AND CAP
7	ASSUMPTO	WEST OF AIR SEPARATOR	CONCRETE BOX	2' X 2' X 3'	N/A	N/A			HYDROCHECK LEVEL		(OUT OF SERVICE) BACK FILL AND CAP
8	ASSUMPTO	WEST OF TANK 1205 AT P-1235	METAL BOX	8' X 8' X 8'	N/A	N/A			HYDROCHECK LEVEL		(OUT OF SERVICE) BACK FILL AND CAP
9	ASSUMPTO	SOUTH OF TANK 1208	METAL BOX	3' X 3' X 3'	N/A	N/A			HYDROCHECK LEVEL		(OUT OF SERVICE) BACK FILL AND CAP
10	ASSUMPTO	SOUTH OF TANK 1215	METAL BOX	3' X 3' X 3'	N/A	N/A			HYDROCHECK LEVEL		(OUT OF SERVICE) BACK FILL AND CAP
11	ASSUMPTO	WEST OF TANK 1209 AT P-1233	CONCRETE BOX	2' X 2' X 3' 1/2'	11/21/2007		FAIL	GLES, INC.	HYDROCHECK LEVEL		Sump 205 STATUS UNKNOWN
12	ASSUMPTO	WEST OF MAIN GEORGE BUILDING (OLD MAC CONDENSATE SUMP)	CONCRETE BOX	3' X 3' X 3'	11/21/2007				HYDROCHECK LEVEL		Sump 206 STATUS UNKNOWN
13	ASSUMPTO	NW CORNER OF MAIN BUILDING (OLD MAC CONDENSATE SUMP)	CONCRETE BOX	3' X 3' X 3'	11/21/2007				HYDROCHECK LEVEL		Sump 207 STATUS UNKNOWN
14	ASSUMPTO										
1	HEP	TRUCK UNLOADING EAST OF TANK 1201A									RESPONSIBILITY OF HEP- LAST TEST DATE UNKNOWN
2	HEP	SOUTH OF TANK 1201D									RESPONSIBILITY OF HEP- LAST TEST DATE UNKNOWN
3	HEP	SOUTH AND WEST OF TANK 1201D									RESPONSIBILITY OF HEP- LAST TEST DATE UNKNOWN
4	HEP	AT TRAIL ROAD LOADING SPUR ALONG MAG-WAY									RESPONSIBILITY OF HEP- LAST TEST DATE UNKNOWN
5	HEP	SUMP LOCATED NORTH OF TRUCK BACK									RESPONSIBILITY OF HEP- LAST TEST DATE UNKNOWN
6	HEP	AT TRUCK LOADING BACK									RESPONSIBILITY OF HEP- LAST TEST DATE UNKNOWN
7	HEP	SOUTH AND EAST OF TANK 1204									RESPONSIBILITY OF HEP- LAST TEST DATE UNKNOWN
8	HEP	SOUTH OF TANK 1204									RESPONSIBILITY OF HEP- LAST TEST DATE UNKNOWN
9	HEP	AT PROVER MANTLE SOUTH AND EAST OF TANK 1201A									RESPONSIBILITY OF HEP- LAST TEST DATE UNKNOWN



SEWER LINES, BOXES & HUBS
TEST RECORD

REVISED 2/23/2007

COUINGTON

TESTING INFORMATION

NW CORNER OF MAIN BUILDING.

UNIT NUMBER

OLD A/C CONDENSATE SUMP

DRAWING NUMBER

LINE, BOX OR HUB NUMBER

83 SUMP 19

TEST MEDIUM:

WATER

TESTED STARTED AT

10:00 AM

TEST TERMINATED AT

11:00 AM

TEST PASS OR FAIL

FAIL

REPAIRS MADE OR COMMENTS:

NEED TO BE REPAIR FROM THE BOTTOM FLOOR.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE:

CLEY MONTES GILES FAC.

DATE:

11-21-07

OCD REPRESENTATIVE:

CONTACTED BUT NOT PRESENT.

DATE:

Note: Notify Darrell Moore so he can contact OCD's District Office & Santa Fe Office to witness testing (72 hrs notice required)

Note: Notify Darrell Moore of any test that fails.

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SEWER LINES, BOXES & HUBS
TEST RECORD

REVISED 2/23/2007

LOUINGTON

TESTING INFORMATION

UNIT NUMBER BUNDLE CLEANING PAD
DRAWING NUMBER _____
LINE, BOX OR HUB NUMBER # 83 SUMP 07
TEST MEDIUM: WATER
TESTED STARTED AT 9:45 A.M.
TEST TERMINATED AT 1:45 P.M.
TEST PASS OR FAIL PASS

REPAIRS MADE OR COMMENTS:

BUNDLE CLEANING PAD FIBER GLASS SUMP PASS TEST.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: ALY MONTEZ FILES INC. DATE: 11-21-07
OCD REPRESENTATIVE: CONTACTED BUT NOT PRESENT. DATE: _____

Note: Notify Darrell Moore so he can contact OCD's District Office & Santa Fe Office to witness testing (72 hrs notice required)
Note: Notify Darrell Moore of any test that fails.
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SEWER LINES, BOXES & HUBS
TEST RECORD

REVISED 2/23/2007

COVINGTON

TESTING INFORMATION

UNIT NUMBER NON-HAZ-PAD
DRAWING NUMBER _____
LINE, BOX OR HUB NUMBER 83 SUMP 06
TEST MEDIUM: WATER
TESTED STARTED AT 9:30 a.m.
TEST TERMINATED AT 1:30 p.m.
TEST PASS OR FAIL PASS

REPAIRS MADE OR COMMENTS:

NON-HAZ-PAD SUMP BOX IS GOOD.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: ALEX MONTES GILES INC. DATE: 11-8-07

OCD REPRESENTATIVE: CONTACTED BUT NOT PRESENT DATE: _____

Note: Notify Darrell Moore so he can contact OCD's District Office & Santa Fe Office to witness testing (72 hrs notice required)

Note: Notify Darrell Moore of any test that fails.

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SEWER LINES, BOXES & HUBS
TEST RECORD

REVISED 2/23/2007

LOUNGTON

TESTING INFORMATION

UNIT NUMBER

SOUTH OF
CAUSTIC TANKS 400 & 401

DRAWING NUMBER

LINE, BOX OR HUB NUMBER

83 SUMP 0.5

TEST MEDIUM:

WATER

TESTED STARTED AT

9:00 P.M.

TEST TERMINATED AT

1:00 P.M.

TEST PASS OR FAIL

PASS

REPAIRS MADE OR COMMENTS:

SUMP BOX SOUTH OF CAUSTIC TANKS OF 400 & 401 IS GOOD.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE:

CLEY MONTES GATES INC.

DATE: 11-21-07

OCD REPRESENTATIVE:

CONTACTED BUT NOT PRESENT.

DATE:

Note: Notify Darrell Moore so he can contact OCD's District Office & Santa Fe Office to witness testing (72 hrs notice required)

Note: Notify Darrell Moore of any test that fails.

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SEWER LINES, BOXES & HUBS
TEST RECORD

REVISED 2/23/2007

TESTING INFORMATION

UNIT NUMBER

(NAPHA SUMP) (LOUINKTON)
NORTH OF CONTROL ROOM

DRAWING NUMBER

LINE, BOX OR HUB NUMBER

SUMP# 83 SUMP 04

TEST MEDIUM:

WATER

TESTED STARTED AT

9:00 A.M.

TEST TERMINATED AT

1:00 P.M.

TEST PASS OR FAIL

PASS

REPAIRS MADE OR COMMENTS:

NAPHA SUMP NORTH OF CONTROL ROOM IS 100% GOOD

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE:

GUY MONTES FILES IN.

DATE: 11-21-07

OCD REPRESENTATIVE:

CONFUSED BUT NOT PRESENT.

DATE:

Note: Notify Darrell Moore so he can contact OCD's District Office & Santa Fe Office to witness testing (72 hrs notice required)

Note: Notify Darrell Moore of any test that fails.

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**NAVAJO REFINING COMPANY
LOVINGTON REFINERY
SEWER TESTING**

Note: Notify Darrell Moore so he can contact OCD's District Office and Santa Fe Office to witness testing (72 hrs notice required)

UNIT #	DWG #	LINE, BOX OR HUB #	TEST MEDIUM	TEST DATE	TEST METHOD	TESTED BY	TEST PASS/FAIL	COMMENTS / REPAIR METHOD
83		PSB#01 TO LPS#8809	WATER	5/23/2005	HYDRO	RODRIGO, LIRA	PASS	
83		PSB#01 TO LPS#8817 TO LML#8800	WATER	5/26/2005	HYDRO	RODRIGO, LIRA	PASS	
83		LML#8800 TO LPS#8813	WATER	6/3/2005	HYDRO	CLEY MONTES	PASS	
83		LML#8804 TO PSB#05	WATER	6/7/2005	HYDRO	CLEY MONTES	PASS	
83		LML#8800 TO LPS#8810	WATER	6/9/2005	HYDRO	CLEY MONTES	FAIL	REPLACED ENTIRE LINE/RETEST
83		LML#8800 TO LPS#8811 TO LPS#8810	WATER	6/10/2005	HYDRO	CLEY MONTES	PASS	
83		PSB#02	WATER	6/24/2005	HYDRO	CLEY MONTES	PASS	
83		PSB#04 TO LML#8801 TO PSB #03	WATER	6/28/2005	HYDRO	CLEY MONTES	PASS	
83		PSB#03 TO LML#8802	WATER	6/30/2005	HYDRO	CLEY MONTES	PASS	
83		LPS#8815 TO PSB#03, 06, 07 TO LPS#8817 TO LPS#8816 TO PSB#08	WATER	7/3/2005	HYDRO	CLEY MONTES	PASS	
83		PSB#03 TO LPS#8816 TO PSB#09 TO PSB#10	WATER	7/8/2005	HYDRO	CLEY MONTES	PASS	
83		LML#8802 TO PSB#04	WATER	7/11/2005	HYDRO	CLEY MONTES	PASS	
83		PSB#04 TO LPS#8820 TO PSB#11 TO LPS#8821 TO PSB#12	WATER	7/13/2005	HYDRO	CLEY MONTES	PASS	
83		LPS#8822 TO LML#8803 TO LPS#8823 TO LPS#8824 TO LPS#8825 TO LPS#8826	WATER	7/15/2005	HYDRO	CLEY MONTES	PASS	
83		LML#8803 TO LPS#8823 TO LPS#8824 TO LPS#8825	WATER	7/19/2005	HYDRO	CLEY MONTES	FAIL	
83		LML#8804 TO LPS#8826	WATER	8/2/2005	HYDRO	CLEY MONTES	PASS	MADE REPAIRS/RETEST
83		LML#8804 TO LPS#8827	WATER	8/8/2005	HYDRO	CLEY MONTES	PASS	
83		LML#8804 TO LPS#8828	WATER	8/11/2005	HYDRO	CLEY MONTES	FAIL	
83		LML#8804 TO LPS#8829 TO LPS#8830 TO LPS#8831	WATER	8/20/2005	HYDRO	CLEY MONTES	PASS	MADE REPAIRS/RETEST
83		LML#8804 TO LPS#8832 TO LPS#8833 TO LPS#8834	WATER	8/21/2005	HYDRO	CLEY MONTES	FAIL	
83		LPS#8835 TO LPS#8836 TO LPS#8837	WATER	8/29/2005	HYDRO	CLEY MONTES	PASS	MADE REPAIRS/RETEST
83		LPS#8838 TO LPS#8839	WATER	10/19/2005	HYDRO	CLEY MONTES	FAIL	
83		PSB#14 TO LPS#8833 TO LPS#8832 TO LPS#8834	WATER	10/24/2005	HYDRO	CLEY MONTES	PASS	MADE REPAIRS/RETEST
83		PSB#14 TO LPS#8833 TO LPS#8832 TO LPS#8834	WATER	10/24/2005	HYDRO	CLEY MONTES	PASS	
83		LML#8805 TO LPS#8838 TO LPS#8839 TO LPS#8840	WATER	10/24/2005	HYDRO	CLEY MONTES	PASS	MADE REPAIRS/RETEST
83		LML#8807 TO LPS#8791 TO LPS#8792	WATER	11/10/2005	HYDRO	CLEY MONTES	PASS	
83		LML#8807 TO LPS#8843	WATER	11/17/2005	HYDRO	CLEY MONTES	PASS	
83		LML#8806 TO LPS#8844	WATER	11/21/2005	HYDRO	CLEY MONTES	PASS	
83		PSB#17 TO LPS#8848, TIKOS#8849	WATER	11/28/2005	HYDRO	CLEY MONTES	FAIL	
83		LML#8807 TO LPS#8850 TO LPS#8790	WATER	12/10/2005	HYDRO	CLEY MONTES	PASS	MADE REPAIRS/RETEST
83		LML#8807 TO LPS#8850 TO LPS#8790	WATER	12/14/2005	HYDRO	CLEY MONTES	FAIL	
83		LML#8807 TO LPS#8993	WATER	12/22/2005	HYDRO	CLEY MONTES	PASS	MADE REPAIRS/RETEST
83		LML#8807 TO LPS#8841	WATER	12/29/2005	HYDRO	CLEY MONTES	PASS	
83		LPS#8853 TO LPS#8841	WATER	1/6/2006	HYDRO	CLEY MONTES	PASS	
83		LML#8805 TO LPS#8838	WATER					
83		PSB#04 TO LML#8803 TO PSB#13 TO PSB#04 TO PSB#114 TO LML#8805 TO PSB#15	WATER	1/10/2006	HYDRO	CLEY MONTES	FAIL	
83		PSB#04 TO LML#8803 TO PSB#13 TO PSB#04 TO PSB#114 TO LML#8805 TO PSB#15	WATER	1/13/2006	HYDRO	CLEY MONTES	PASS	MADE REPAIRS/RETEST



REFINING COMPANY

SEWER LINES, BOXES & HUBS

TEST RECORD

TESTING INFORMATION

UNIT NUMBER CONTRACT # 83
 DRAWING NUMBER CONTRACT SEWERS
 LINE, BOX OR HUB NUMBER PSB # 01 TO IPS # 8805
 TEST MEDIUM: WATER
 TESTED STARTED AT 9:00 AM
 TEST TERMINATED AT 1:00 PM
PASS

REMARKS: TEST LINE # PPS 8805 TO SEWER BOX PSB 01 INCLUDED 2 O.W.S.
AND HOLDS 100%.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE:

RODRIGO LIRA

DATE: 05-23-05

OCD REPRESENTATIVE:

DATE:

COPIES TO: ENVIRONMENTAL DEPT.

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER

LOVINGTON #83

DRAWING NUMBER

LOVINGTON SEWERS

LINE, BOX OR HUB NUMBER

PS#01 TO PS#02 TO 125881270 MC#8800

TEST MEDIUM:

WATER

TESTED STARTED AT

10:00 am

TEST TERMINATED AT

2:00 pm

PASS

REMARKS:

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE:

RODRIGO LAD

DATE: 05-16-05

OCB REPRESENTATIVE:

DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOWINGTON #83
DRAWING NUMBER LOWINGTON SEWERS
LINE, BOX OR HUB NUMBER LINE # 8800 TO 1PS# 8813
TEST MEDIUM: WATER
TESTED STARTED AT 9:00 AM
TEST TERMINATED AT 1:00 PM
PASS

REMARKS: TEST SEWER LINES # 8800 TO 1PS# 8813 INCLUDED 2 o.w.s.
400'S 1007.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE:

CEY MONTEZ

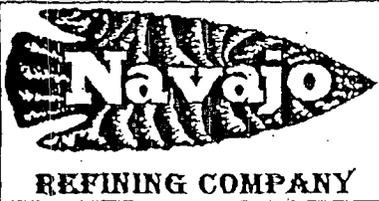
DATE: 06-02-05

OCD REPRESENTATIVE:

DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOUNGTOWN # 83
DRAWING NUMBER LOUNGTOWN SEWERS
LINE, BOX OR HUB NUMBER (ML# 8801 TO 750#05
TEST MEDIUM: WATER
TESTED STARTED AT 8:00 AM
TEST TERMINATED AT 12:00 PM
PASS

REMARKS:

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

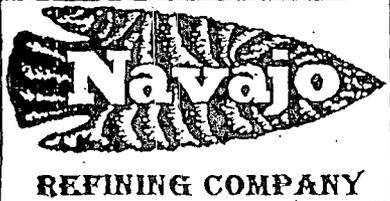
TEST REPRESENTATIVE: CREYNANTES

DATE: 06-07-05

OCD REPRESENTATIVE: _____

DATE: _____

COPIES TO: ENVIRONMENTAL DEPT.



SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOWINGTON #83
DRAWING NUMBER LOWINGTON SEWERS
LINE, BOX OR HUB NUMBER LINE #8800 TO LPS #8811 TO LPS #8810
TEST MEDIUM: WATER
TESTED STARTED AT 9:00 am
TEST TERMINATED AT 2:00 pm
FAIL

REMARKS: TEST SEWER LINE INCLUDED I.O.W.S. . REPLACE ENTIRE LINE ON 6-10-09

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:
TEST REPRESENTATIVE: ROY MONTES DATE: 06-09-05
OCD REPRESENTATIVE: _____ DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOCKINGTON #83
DRAWING NUMBER LOCKINGTON SEWERS
LINE, BOX OR HUB NUMBER LINE #8800 TO LPS#8810 TO LPS#8810
TEST MEDIUM: WATER
TESTED STARTED AT 9:00 AM
TEST TERMINATED AT 2:00 PM
PASS

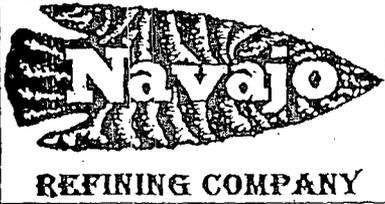
REMARKS: RETEST ENTIRE SEWER LINE AND IT WAS ABLE TO HOLD WATER.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: G. MONTES DATE: 06-10-05
OCD REPRESENTATIVE: _____ DATE: _____

COPIES TO: ENVIRONMENTAL DEPT.



SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOVINGTON # 83
DRAWING NUMBER LOVINGTON SEWERS
LINE, BOX OR HUB NUMBER PSB # 02
TEST MEDIUM: WATER
TESTED STARTED AT 8:00 AM
TEST TERMINATED AT 1:00 PM
PASS

REMARKS: TEST SEWER BOX

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: GEY MONTES

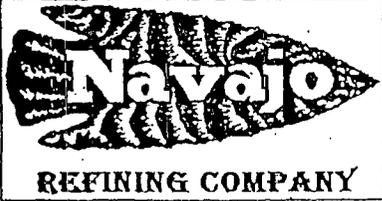
DATE: 06-24-05

QCD REPRESENTATIVE: _____

DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOUNGTON #83
DRAWING NUMBER LOUNGTON SEWERS
LINE, BOX OR HUB NUMBER P5#02 TO 1M1#001 TO P5#003
TEST MEDIUM: WATER
TESTED STARTED AT 9:00 AM
TEST TERMINATED AT 1:00 PM
PASS

REMARKS: TEST SEWER LINE INCLUDED TWO SEWER BOXES.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: CEY MONTEZ

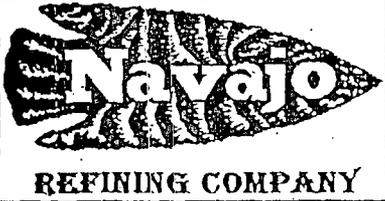
DATE: 06-28-05

OCD REPRESENTATIVE: _____

DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOWRITON #83
DRAWING NUMBER LOWRITON SEWERS
LINE, BOX OR HUB NUMBER P515#03 TO LML# 8802
TEST MEDIUM: WATER
TESTED STARTED AT 8:00 AM
TEST TERMINATED AT 1:00 PM
PASS

REMARKS: TEST SEWER LINE INCLUDED 2 O.W.S.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: ALY MONTEZ DATE: 06-30-05
OCD REPRESENTATIVE: _____ DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOVINGTON #83
DRAWING NUMBER LOVINGTON SEWERS
LINE, BOX OR HUB NUMBER LPS#8815 TO P55#05-06-07 TO LPS 8817 TO LPS 8816 TO P55#08
TEST MEDIUM: WATER
TESTED STARTED AT 8:00 AM
TEST TERMINATED AT 1:00 PM
PASS

REMARKS: TEST SEWER LINES INCLUDED 4 SEWER BOXES AND 11 C.W.S.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: CLAY MONTES DATE: 07-03-05

OGD REPRESENTATIVE: _____ DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOUNGTON
DRAWING NUMBER LOUNGTON SEWERS
LINE, BOX OR HUB NUMBER BB#03 TO LPS # 8818 TO LPS # 8819 TO PS#09 PS#10
TEST MEDIUM: WATER
TESTED STARTED AT 8:00 AM
TEST TERMINATED AT 1:00 PM
PASS

REMARKS: TEST SEWER LINES INCLUDED 2 SEWER BOXES AND 3 OWIS

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:
TEST REPRESENTATIVE: CLY MONTE DATE: 07-08-05
OCD REPRESENTATIVE: _____ DATE: _____

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REFINING COMPANY

SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOWINGTON #85
DRAWING NUMBER LOWINGTON SEWERS
LINE, BOX OR HUB NUMBER LINE 8801 TO 7504
TEST MEDIUM: WATER
TESTED STARTED AT 8:00 AM
TEST TERMINATED AT 1:00 PM
PASS

REMARKS: TEST SEWER LINES INCLUDED 10.W.S.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: CLEMONTES

DATE: 07-11-05

OCD REPRESENTATIVE: _____

DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOUNGTON #83
DRAWING NUMBER LOUNGTON SEWERS
LINE, BOX OR HUB NUMBER SPS# 09 TO LPS 881 to PS# 11 TO LPS# 881 TO PS# 12
TEST MEDIUM: WATER
TESTED STARTED AT 9:00 AM
TEST TERMINATED AT 1:00 PM
PASS

REMARKS: TEST SEWER LINES INCLUDED 10 W.S. AND 2 SEWER BOXES.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: CICY MONTES DATE: 07-13-05

OCD REPRESENTATIVE: _____ DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOCKINGTON #83
DRAWING NUMBER LOCKINGTON SEWERS
LINE, BOX OR HUB NUMBER LPS #881120 UNIT 8803
TEST MEDIUM: WATER
TESTED STARTED AT 9:00 AM
TEST TERMINATED AT 1:00 PM
PBS

REMARKS: TEST SEWER LINE INCLUDED 6 D.W.S.

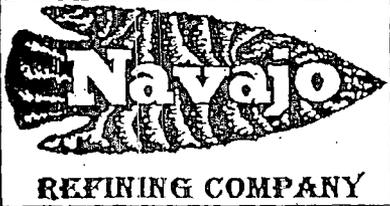
TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: ALY MONTEZ DATE: 07-15-0
OCD REPRESENTATIVE: _____ DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOWINGTON #85
DRAWING NUMBER LOWINGTON SEWERS
LINE, BOX OR HUB NUMBER 1MP#8883 TO LPS#8883 TO LPS#8884 TO LPS#8885 TO LPS#8887 TO LPS#8886
TEST MEDIUM: WATER
TESTED STARTED AT 10:00 PM
TEST TERMINATED AT 2:00 PM
LEAKS

REMARKS: TEST SEWER LINES INCLUDED F.O.W.S.
PUT OUT OF ACTION SEWER LINE TO REPAIR

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: CLEY MONTES DATE: 07-19-05

QCD REPRESENTATIVE: _____ DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOUISIANA HBS
DRAWING NUMBER LOUISIANA SEWERS
LINE, BOX OR HUB NUMBER 1 MILE 8823 TO LRS# 8823 TO LRS# 8824 TO LRS# 8825 TO LRS# 8827 TO LRS# 8826
TEST MEDIUM: WATER
TESTED STARTED AT 9:00 AM
TEST TERMINATED AT 1:00 PM
PASS

REMARKS: RE TEST SEWER LINE AFTER REPAIRS WERE MADE AND ITS HOLDING 100%.

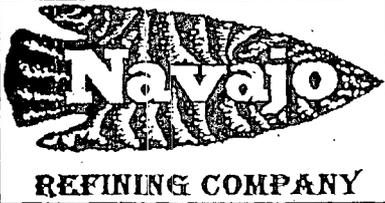
TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: CLY NORTON DATE: 08-01-05
OCD REPRESENTATIVE: _____ DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOVINGTON
DRAWING NUMBER LOVINGTON SEWERS
LINE, BOX OR HUB NUMBER LM18804 TO LPSA8828
TEST MEDIUM: WATER
TESTED STARTED AT 8:00 AM
TEST TERMINATED AT 12:00 PM
PASS

REMARKS: TEST SEWER LINE INCLUDED & O.K.S.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: ALCY MONTES

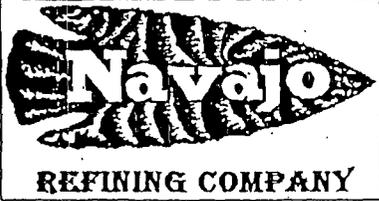
DATE: 08-08-05

OC D REPRESENTATIVE: _____

DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LODINGTON #83
DRAWING NUMBER LODINGTON SEWER
LINE, BOX OR HUB NUMBER LINE #8809 TO LPS#8895 TO LPS#8895 TO LPS#8830
TEST MEDIUM: WATER
TESTED STARTED AT 8:00 AM
TEST TERMINATED AT 12:00 PM
FAIL

REMARKS TEST SEWER LINE AND INCLUDED F.O.W.S.
PUT SEWER LINE OUT OF ACTION UNTIL REPAIRS.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: _____

DATE: 08-11-05

OCD REPRESENTATIVE: _____

DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOCATION #83
DRAWING NUMBER LOCATION SEWER
LINE, BOX OR HUB NUMBER INL #8804 TO LPS #8815 TO LPS 8830
TEST MEDIUM: WATER
TESTED STARTED AT 8:00 AM
TEST TERMINATED AT 11:00 PM
PASS

REMARKS: RE TEST ENTIRE LINE AFTER REPAIRS AND AS HOLDING 1007.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: CLEY HONTES DATE: 08-20-05
OCD REPRESENTATIVE: _____ DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOUKTON #83
DRAWING NUMBER LOUKTON SEWERS
LINE, BOX OR HUB NUMBER LPS # 8895 TO LPS # 8831
TEST MEDIUM: WATER
TESTED STARTED AT 8:00 AM
TEST TERMINATED AT 12:00 PM
FAIL

REMARKS: TEST LINE ENCLOSED & O.W.S.
PUT LINE OUT OF ACTION UNTIL REPAIRS ARE MADE.

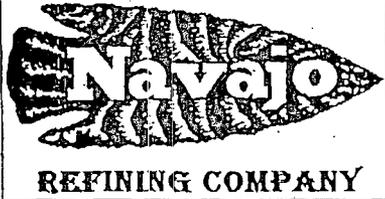
TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: CLYD MONTE DATE: 08-21-05
OCD REPRESENTATIVE: _____ DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

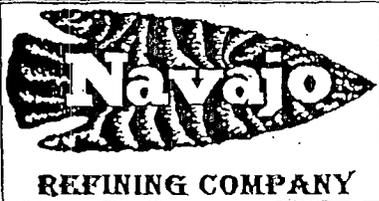
UNIT NUMBER LOUNGTON #83
DRAWING NUMBER LOUNGTON SEWERS
LINE, BOX OR HUB NUMBER LPS #8819 TO LPS #8831
TEST MEDIUM: WATER
TESTED STARTED AT 8:00 AM.
TEST TERMINATED AT 12:00 PM

REMARKS: RETEST AFTER ^{PASS}
ENTIRE LINE WAS REPAIR AND ITS HOLDING 100%.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:
TEST REPRESENTATIVE: CEY MONTES DATE: 08-25-05
OCD REPRESENTATIVE: _____ DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOUKETON #83
DRAWING NUMBER LOUKETON SEWERS
LINE, BOX OR HUB NUMBER PS3P#17013 #803 TO 1PS#802 TO 1PS#803
TEST MEDIUM: WATER
TESTED STARTED AT 9:00 AM
TEST TERMINATED AT 12:00 PM

FAIL

REMARKS: TEST LINE INCLUDED 6 O.W.S. AND LEAKED 9" IN 1 HOUR.
PUT SEWER LINE OUT OF ACTION UNTIL REPAIRS ARE MADE.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: CLY MANTIS DATE: 10-15-05
OCD REPRESENTATIVE: _____ DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOWINGTON P 83
DRAWING NUMBER LOWINGTON SEWERS
LINE, BOX OR HUB NUMBER 258740 LPS # 8833 TO LPS # 8836 TO LPS 8839
TEST MEDIUM: WATER
TESTED STARTED AT 9:00 AM
TEST TERMINATED AT 1:00 PM
PASS

REMARKS: RE TEST ENTIRE LINE AFTER REPAIRS WERE MADE AND IT IS HOLDING 100%

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: CLEY MONTEZ DATE: 10-15-05

OCD REPRESENTATIVE: _____ DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOUINATON # 83
DRAWING NUMBER LOUINATON SEWERS
LINE, BOX OR HUB NUMBER LML # 8805 TO LPS# 8838 TO LPS# 8839 TO LPS # 8840
TEST MEDIUM: WATER
TESTED STARTED AT 8:30 AM
TEST TERMINATED AT 1:30 PM
PASS

REMARKS: TEST SEWER LINES INCLUDED S.O.W.S.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: REY MONTES DATE: 10-20-05

OCD REPRESENTATIVE: _____ DATE: _____

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REFINING COMPANY

SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOUNGTON

DRAWING NUMBER LOUNGTON SEWERS

LINE, BOX OR HUB NUMBER LINE # 8807 TO LPS # 8891 TO LPS 88792

TEST MEDIUM: WATER

TESTED STARTED AT 8:00 AM

TEST TERMINATED AT 12:00 PM

FAIL

REMARKS: TEST LINE INCLUDED 90.00'. FAIL & LEAK 5" IN 1 MIN.
POT BEING OUT OF SERVICE FOR REPAIRS.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: CLAY MONTES DATE: 10-26-05

OCD REPRESENTATIVE: _____ DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOWINGTON
DRAWING NUMBER LOWINGTON SEWER
LINE, BOX OR HUB NUMBER 1MLA8807 TO 1PS#8791 TO 1WS#8792
TEST MEDIUM: WATER
TESTED STARTED AT 8:00 AM
TEST TERMINATED AT 12:00 PM
PASS

REMARKS: RE TEST AFTER ENTIRE LINE REPAIR AND HOLDS 100%.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: GUY MONTES DATE: 10-30-05
OCD REPRESENTATIVE: _____ DATE: _____

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REFINING COMPANY

SEWER LINES, BOXES & HUBS

TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOUINGTON
DRAWING NUMBER LOUINGTON SEWERS
LINE, BOX OR HUB NUMBER LML #8806 TO LPS #8897
TEST MEDIUM: WATER
TESTED STARTED AT 9:00 AM
TEST TERMINATED AT 1:00 PM
PASS

REMARKS: TEST SEWER LINE 1 O.W.S.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: GLEY MONTES

DATE: 11-17-05

OCB REPRESENTATIVE: _____

DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOUNGTOWN
DRAWING NUMBER LOUNGTOWN SEWERS
LINE, BOX OR HUB NUMBER PS#17 TO PS#8898 TO PS#8899
TEST MEDIUM: WATER
TESTED STARTED AT 9:30 AM
TEST TERMINATED AT 1:30 pm
PASS

REMARKS: TEST SEWER LINE INCLUDED b.o.w.s.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: CLY MONTES DATE: 11-9-05

OCD REPRESENTATIVE: _____ DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOUNGTON
DRAWING NUMBER LOUNGTON SEWERS
LINE, BOX OR HUB NUMBER 211478807 TO 8PS#8850 TO 8PS#8790
TEST MEDIUM: WATER
TESTED STARTED AT 9:00 AM
TEST TERMINATED AT 1:00 PM
FALL

REMARKS: TEST SEWER LINE INCLUDED 5 O.W.S.

PUT SEWER LINE OUT OF SERVICE UNTIL REPAIRS ARE MADE.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: CEY MONTES DATE: 11-28-05

OCD REPRESENTATIVE: _____ DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LODINGTON
DRAWING NUMBER LODINGTON SEWERS
LINE, BOX OR HUB NUMBER LINE# 8807 TO 8857 8850 TO 8859
TEST MEDIUM: WATER
TESTED STARTED AT 8:00 AM
TEST TERMINATED AT 12:00 PM
PASS

REMARKS: RE TEST ENTIRE LINE AFTER REPAIRS WERE MADE AND HOLDS 100%.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: CLY MONTES DATE: 12-10-05
OCD REPRESENTATIVE: _____ DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOXINGTON
DRAWING NUMBER LOXINGTON SEWERS
LINE, BOX OR HUB NUMBER (ML #8807 TO LPS8893)
TEST MEDIUM: WATER
TESTED STARTED AT 8:00 AM
TEST TERMINATED AT 12:00 PM
FAIL

REMARKS: TEST SEWER LINE INCLUDED 70 W.S.
PUT OUT OF SERVICE UNTIL REPAIRS.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: DEY MONTESS DATE: 12-14-05
OCD REPRESENTATIVE: _____ DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOUNXT00
DRAWING NUMBER LOUNXT00 SEWERS
LINE, BOX OR HUB NUMBER LINE 8907 TO 125 8953
TEST MEDIUM: WATER
TESTED STARTED AT 9:00 AM
TEST TERMINATED AT 1:00 PM
PASS

REMARKS: 7E TEST ENTIRE SEWER LINE AFTER REPAIRS AND HOLOS 100%.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: CLY MONTE DATE: 12-20-05

OCD REPRESENTATIVE: _____ DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOUINGTON
DRAWING NUMBER LOUINGTON SEWERS
LINE, BOX OR HUB NUMBER LPS # 8838 TO LPS # 8891
TEST MEDIUM: WATER
TESTED STARTED AT 9:00 AM
TEST TERMINATED AT 1:00 PM
PASS

REMARKS: TEST SEWER LINE AROUND 30 W.S.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: CLY MONTES DATE: 12-28-05
OCD REPRESENTATIVE: _____ DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOUKTON
DRAWING NUMBER LOUKTON SEWERS
LINE, BOX OR HUB NUMBER ML# 8805 TO 125 8838
TEST MEDIUM: WATER
TESTED STARTED AT 8:00 AM
TEST TERMINATED AT 12:00 PM
PASS

REMARKS: TEST

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: ROY MONTES

DATE: 1-06-06

OCOD REPRESENTATIVE: _____

DATE: _____

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REFINING COMPANY

SEWER LINES, BOXES & HUBS TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOUINK TON

DRAWING NUMBER LOUINK TON SEWERS

LINE, BOX OR HUB NUMBER PSB A04 TO LMLP B05 TO PSB P13 TO PSB H04 TO PSB K14 TO LML A B05 TO PSB A15

TEST MEDIUM: WATER

TESTED STARTED AT 8:30 AM

TEST TERMINATED AT 12:30 PM

FAIL

REMARKS: TEST SEWER LINE AND 3 SEWER BOXES
PUT SEWER LINE OUT OF SERVICE UNTIL REPAIRS ARE MADE.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: CLEY MONTES DATE: 1-10-06

OCD REPRESENTATIVE: _____ DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOWINGTON
DRAWING NUMBER LOWINGTON SEWERS
LINE, BOX OR HUB NUMBER PSB04 TO LMLH8805 TO PSIS15 TO PSB04
TO PSB 14 TO LML8805 TO PSB15
TEST MEDIUM: WATER
TESTED STARTED AT 8:00 AM
TEST TERMINATED AT 12:00 PM
PASS

REMARKS: RE TEST ENTIRE LINE AFTER REPAIRS WERE MADE AND HOLDS 100%

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:
TEST REPRESENTATIVE: GUY MONTEZ DATE: 1-13-06
OCD REPRESENTATIVE: _____ DATE: _____

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOVINGTON
DRAWING NUMBER LOVINGTON SEWERS
LINE, BOX OR HUB NUMBER BS#15 TO LML#8806 TO PSB#17
TEST MEDIUM: WATER
TESTED STARTED AT 9:00 AM
TEST TERMINATED AT 1:00 PM
FALL

REMARKS: TEST LINE & LEAK 5' IN 5 MIN.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE:

LUY MONTES

DATE:

01-20-06

OCD REPRESENTATIVE:

DATE:

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SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOUINHTO d
DRAWING NUMBER LOUINHTO d SEWERS
LINE, BOX OR HUB NUMBER PSB #15 TO LML#BB06 TO PSD #17
TEST MEDIUM: WATER
TESTED STARTED AT 9:00 AM
TEST TERMINATED AT 1:00 PM
PASS

REMARKS: RE TEST AFTER REPAIRS WERE MADE ON ENTIRE LINE AND HOLOS 1007.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: CLY MONTES DATE: 08-07-05

OCD REPRESENTATIVE: _____ DATE: _____

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REFINING COMPANY

SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOUINKTON
 DRAWING NUMBER LOUINKTON SEWERS
 LINE, BOX OR HUB NUMBER PSB#17 TO LML #8807 TO 938#19
 TEST MEDIUM: WATER
 TESTED STARTED AT 11:00 AM
 TEST TERMINATED AT 3:00 PM
FALL

REMARKS: TEST LINE INCLUDED I.O.W.S.
PUT OUT OF SERVICE ENTIRE LINE UNTIL REPAIRS

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: CLAY MONTES DATE: 04-26-06

OCD REPRESENTATIVE: _____ DATE: _____

COPIES TO: ENVIRONMENTAL DEPT.



SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER Lockington
DRAWING NUMBER Lockington Sewer
LINE, BOX OR HUB NUMBER PS# 17 TO M# 8807 TO PS# 15
TEST MEDIUM: WATER
TESTED STARTED AT 9:00 AM
TEST TERMINATED AT 1:00 PM
PASS

REMARKS: RE TEST ENTIRE LINE AFTER REPAIRS AND HOLDS 100%

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: CLEY MONTES DATE: 04-28-06

OCD REPRESENTATIVE: _____ DATE: _____

COPIES TO: ENVIRONMENTAL DEPT.

E:\DATA\MAINTEN\1230DATA\sewerdoc.WK4



SEWER LINES, BOXES & HUBS
TEST RECORD

TESTING INFORMATION

UNIT NUMBER LOUNGTON
DRAWING NUMBER LOUNGTON SEWERS
LINE, BOX OR HUB NUMBER LINE # 8807 TO CPS 8994
TEST MEDIUM: WATER
TESTED STARTED AT 8:00 AM
TEST TERMINATED AT 12:00 PM
PA3

REMARKS: TEST LINE INCLUDED I.O.W.S.

TEST ACCEPTANCE

TESTING COMPLETED AND ACCEPTED BY:

TEST REPRESENTATIVE: CLEY MONTES DATE: 04-30-06
OCD REPRESENTATIVE: _____ DATE: 04-30-06

COPIES TO: ENVIRONMENTAL DEPT.

WASTE STREAMS FOR LOVINGTON

Spent Caustic

Crude Contaminated Soil

Gas Oil Contaminated Soil

Asphalt

Blast Sand

Tank Seals

Diesel Contaminated Soil

Steel Drums

Cement

Absorbent Pads

Wastewater

Pall Rings

Wooden Pallets

Naphtha Contaminated Soil

Kerosene Contaminated Soil

Office Trash

Plant Debris

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Monday, March 24, 2008 11:40 AM
To: 'Moore, Darrell'
Cc: 'eloy.hernandez@navajo-refining.com'; 'steve.terry@navajo-refining.com'; Price, Wayne, EMNRD
Subject: March 14, 2008 OCD Inspection Follow-Up or Clarification Items

Darrell:

Good morning. As stated during the inspection, I had planned to send you an e-mail requesting more info. or expanding on inspection items during the inspection; consequently, please find below the discharge permit follow-up items needed to complete the OCD inspection:

- 1) Item 3 (Drum Storage): "All drums containing materials other than fresh water must be stored on an impermeable pad with curbing." The OCD noticed that an impermeable centralized pad area was constructed to store chemicals; however, there are plans to construct another impermeable pad area adjacent to the existing one to separate incompatible chemicals. Please provide the anticipated date of construction of the new impermeable pad along with a drawing that reflects the existing and new central pad storage areas. Also, any plans of new or anticipated expansion at the refinery should also be submitted to the OCD for review.
- 2) Item 5 (Above Ground Tanks): "All new facilities or modifications to existing facilities must place the tank on an impermeable pad within the berm." The OCD informed Navajo Personnel that under the new permit, existing tanks containing chemicals or new tanks containing chemicals will need to be retrofitted or constructed with impermeable pads to satisfy new discharge permit conditions; however, the OCD will work with Navajo to request a schedule from Navajo identifying the tanks and phases for completing the above.
- 3) Item 8 (Below Grade Tanks/Sumps): Please provide proof of test data for sumps, since 2002. "All pre-existing sumps and below-grade tanks must be tested to demonstrate their mechanical integrity no later than December 15, 2002. and every year from tested date, thereafter."
- 4) Item 9 (Underground Process/Wastewater Lines): Please provide 2007 test data for process and wastewater lines. "All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity no later than December 15, 2002, and every 5 years, from tested dated, thereafter."
- 5) Item 10 (Class V Wells): Please provide proof of permit application and correspondence with NMED for septic system at the refinery. "Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department."
- 6) Item 12 (Spill Reporting): Please provide copies of all C-141 spill releases, since October 31, 2002. Identify releases where contamination was left in place or not removed as part of the spill release response. The OCD looked at the last C-141 incident near Tank 1201D where the sump leaked and diesel was released onto the ground migrating westward. Navajo informed the OCD that it recovered standing fluids, but left the contaminated soil in place so as not to exacerbate the contamination due to the cobbly sediment nature of the ground throughout the refinery. Leaving contaminated soil or sediment in place is not an acceptable practice for dealing with releases. Spills are generally cleaned up using visual, olefactory, field PID and final samples (base and sidewalls of excavation) collected and sent to a lab for confirmation that the release was properly cleanup up. The OCD may require further corrective actions based on the C-141s requested above.
- 7) Item 13 (Waste Disposal): Please provide any new waste streams as part of the permit renewal and future expansion plans for the refinery.
- 8) Item 14 (OCD Inspections): Please ensure that there is a minimum one-hundred feet radius non-vegetation zone around the flare stack(s) at the refinery- especially now that the windy season has arrived in SE New Mexico..
- 9) Item 18 (Vadose Zone and Water Pollution): Please provide ground water monitoring reports from MWs at the

4/1/2008

refinery, since the "Groundwater Monitoring & Remediation System Performance Report July 2001 – June 2002." This appears to be the last groundwater monitoring report submitted by Navajo to the OCD?

10) Record keeping is not specified in the existing discharge permit, but will be included in the permit renewal. Please transfer the Lea Refinery records from the Artesia Refinery to the Lea Refinery so they will be onsite for inspections, etc. from now on.

The OCD would appreciate any information requested above within 15 days of receipt of this e-mail message. Please contact me if you have questions or if there is anything missing based on the recent OCD inspection. Thank you.

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3491
Fax: (505) 476-3462
E-mail: CarlJ.Chavez@state.nm.us
Website: <http://www.emnrd.state.nm.us/oed/index.htm>
(Pollution Prevention Guidance is under "Publications")

Chavez, Carl J, EMNRD

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Sent: Monday, March 24, 2008 11:40 AM
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3/24/2008

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(Pollution Prevention Guidance is under "Publications")

OCD ENVIRONMENTAL BUREAU

SITE INSPECTION SHEET

DATE: 9/20/01 Time: 1:15 PM

Type of Facility: Refinery Gas Plant Compressor St. Brine St. Oilfield Service Co.
Surface Waste Mgt. Facility E&P Site Crude Oil Pump Station
Other _____

Discharge Plan No Yes GW# 14

FACILITY NAME: LEA REFINERY

PHYSICAL LOCATION: 5 mi S of LIVINGSTON NM Hwy 18

Legal: QTR QTR Sec TS R R County LEA

OWNER/OPERATOR (NAME) NAVAJO REFINING CO.

Contact Person: STEVE TERRY Tele:# 505-376-5821

MAILING ADDRESS: _____ State NM ZIP 88260

Owner/Operator Rep's:

CHARLIE PLYMALE

OCD INSPECTORS: W PRICE, P STUBBLEY, L JOHNSON

1. **Drum Storage:** All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.

OK

2. **Process Areas:** All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

PIC #3 - MAIN PROCESS AREA - VACUUM UNIT

PIC #4 - NORTH SIDE OF VACUUM UNIT - NEEDS CONTAINMENT

PIC #5 - WEST END OF VACUUM UNIT - " "

PIC #6 - ASPHALT LOAD RACK AREA -

PIC #7 - RR ASPHALT LOAD AREA - OUT of SERVICE

3. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

PIC #1- WASTE PILL 1201 B CRUDE TK

4. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

5. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

6. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.

7. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to discharge plan renewal. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.

8. Onsite/Offsite Waste Disposal and Storage Practices: Are all wastes properly characterized and disposed of correctly?

Does the facility have an EPA hazardous waste number? Yes _____ No _____

ARE ALL WASTE CHARACTERIZED AND DISPOSED OF PROPERLY? YES NO IF NO DETAIL BELOW.

• R.O. RE-JECT WATER NEEDS CLASSIFIED AND NOTED IN DISCHARGE PLAN

9. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

ANY CLASS V WELLS NO YES IF YES DESCRIBE BELOW! Undetermined

10. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.

PIC #2 - BONE YARD - ASPHALT PILE + LIQUID WASTE IN OPEN TOP TR

11. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the proper OCD District Office.

12. Does the facility have any other potential environmental concerns/issues?

ON GOING GROUNDWATER REMEDIATION - RECOVERY PUMP
IS OUT OF SERVICE - NEEDS REPLACING.

13. Does the facility have any other environmental permits - i.e. SPCC, Stormwater Plan, etc.?

SPCC - YES

14. ANY WATER WELLS ON SITE? NO YES IF YES, HOW IS IT BEING USED?

TWO - WELLS BOTH POTABLE

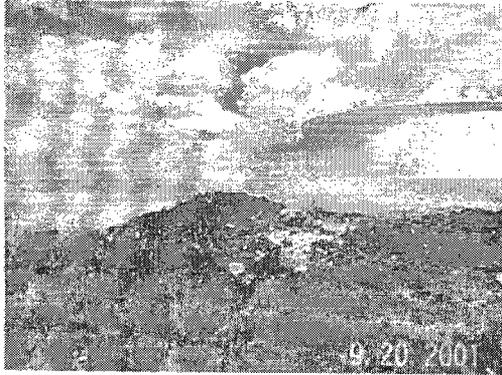
15. Documents reviewed:

~~_____~~

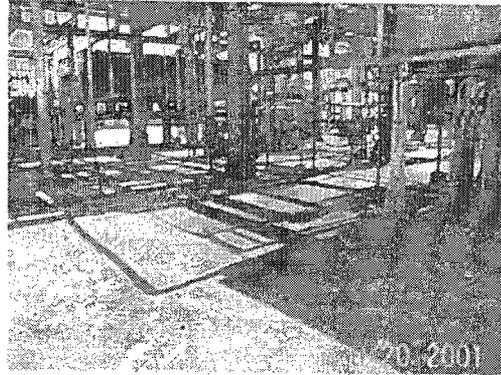
Miscellaneous Comments:

Photos taken: 7

Documents Reviewed/Collected: _____



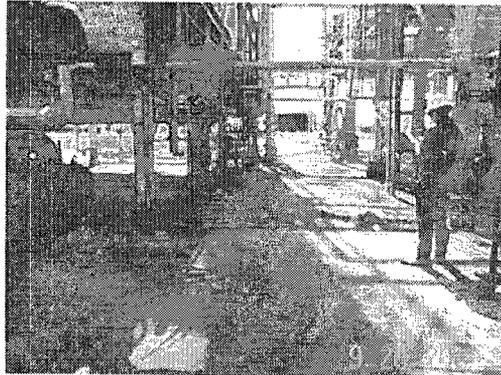
Pic #1 - Waste pile located inside of 1201 crude tank berm.



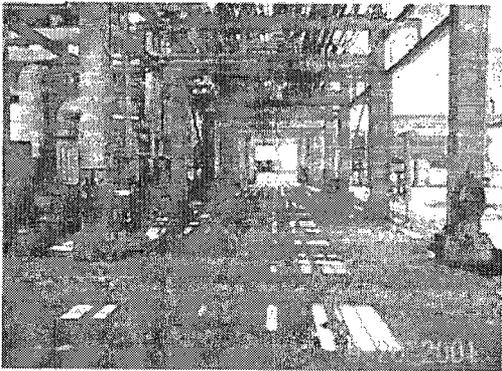
Pic #4 - North side of Vacuum Unit oily contamination on ground surface.



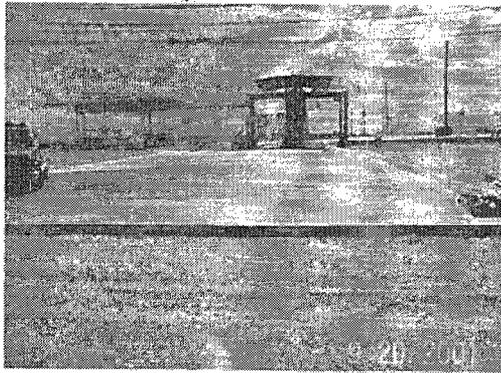
Pic #2 - Bond Yard area- Asphalt pile and liquid waste in open top tank.



Pic #5- West end of Vacuum unit- visual contamination was noted in this area off of the pad.



Pic #3- Main Process Area of Vacuum Unit.



Pic #6- Asphalt loading area.

Navajo Lovington Refinery
Sept 20, 2001
Page 2

OCD Inspectors: WPrice, Meeley, LJohnson



Pic #8- Old Railroad Asphalt load area
not used any more.

OCD ENVIRONMENTAL BUREAU

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DATE: 9/20/01 Time: 1:15 PM

Type of Facility: Refinery Gas Plant Compressor St. Brine St. Oilfield Service Co.
Surface Waste Mgt. Facility E&P Site Crude Oil Pump Station
Other _____

Discharge Plan No Yes GW# 19

FACILITY NAME: LEA REFINERY

PHYSICAL LOCATION: 5 mi S of LIVINGSTON NM Hwy 18

Legal: QTR QTR Sec TS R R County LEA

OWNER/OPERATOR (NAME) NAVAJO REFINING CO.

Contact Person: STEVE TERRY Tele:# 505-396-5821

MAILING ADDRESS: _____ State NM ZIP 88260

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CHARLIE PLYMALE

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TWO - WELLS BOTH POTABLE

15. Documents reviewed:

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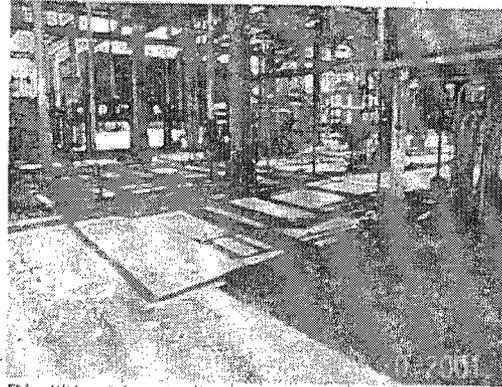
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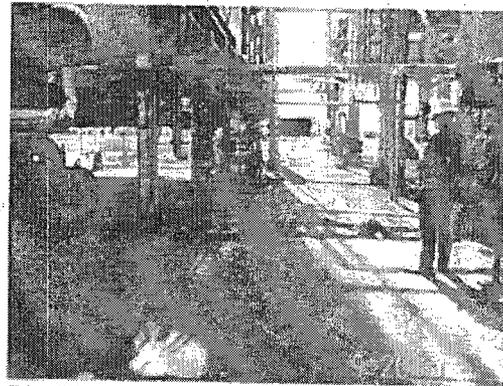
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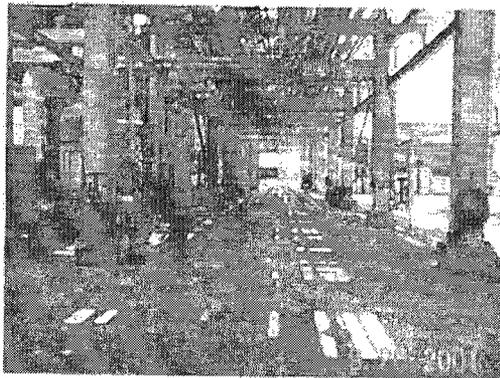
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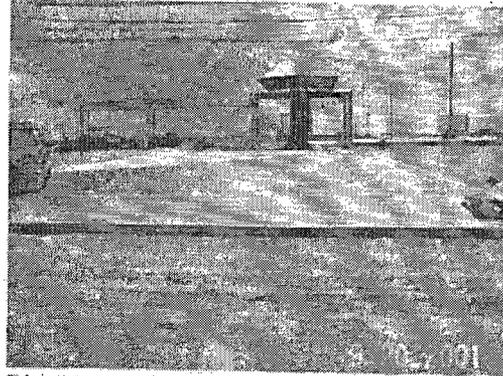
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Sept 20, 2001

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