GW - 119

INSPECTIONS & DATA

ConocoPhillips

ConocoPhillips Company
29 Vacuum Complex Lane
HC 60, Box 66
Lovington, NM 88260-9664

EXPLORATION & PRODUCTION
Permian Basin Asset
EVLRP/CO_2 Plant

January 13, 2006

RECEIVED
JAN 19 2006
Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

Mr. Jack Ford
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, New Mexico 87505

Re: MIT of underground process/wastewater lines
Discharge Permit GW-119
East Vacuum Liquids Recovery Plant

Dear Mr. Ford:

The mechanical integrity testing required by the Attachment to the Discharge Permit GW-119 Approval, Discharge Permit Approval Conditions item 9 that all underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity was done by ConocoPhillips Company (COPC) East Vacuum Liquids Recovery Plant (EVLRP) personnel in December.

On December 13th, 2005 approximately 120 # psi of pressure was applied for 24 hours to the test chart recorder to test it for proper operation. As you can see by the copy of the enclosed chart there was no indication of any pressure change during the test, demonstrating that the test chart recorder was functioning properly.

On December 20th, 2005 the EVLRP Sour NGL and Product Storage Line to the Central Tank Battery (CTB) Surge Tank that has a normal operating pressure of 30 # psi was pressure tested by COPC personnel and a Key Energy Hot Oil Pump Truck. This was done by pressuring the line up to 60 # psi which then stabilized at 55 # psi. As you can see by the enclosed chart copy the pressure test was run for 1 hour 10 minutes after the pressure had stabilized. Line tested well, no leaks.

Also on December 20th, 2005 the EVLRP H_2O Line to the CTB Free Water Knock Out that has a normal operating pressure of 95 # psi was pressure tested by COPC personnel and a Key Energy Hot Oil Pump Truck to 165 # psi. As you can see by the copy of the enclosed chart, the expanding Hydrocarbon vapors in the line caused the pressure to increase to 220 # psi during the 1 hour 10 minutes test. Line tested well, no leaks.

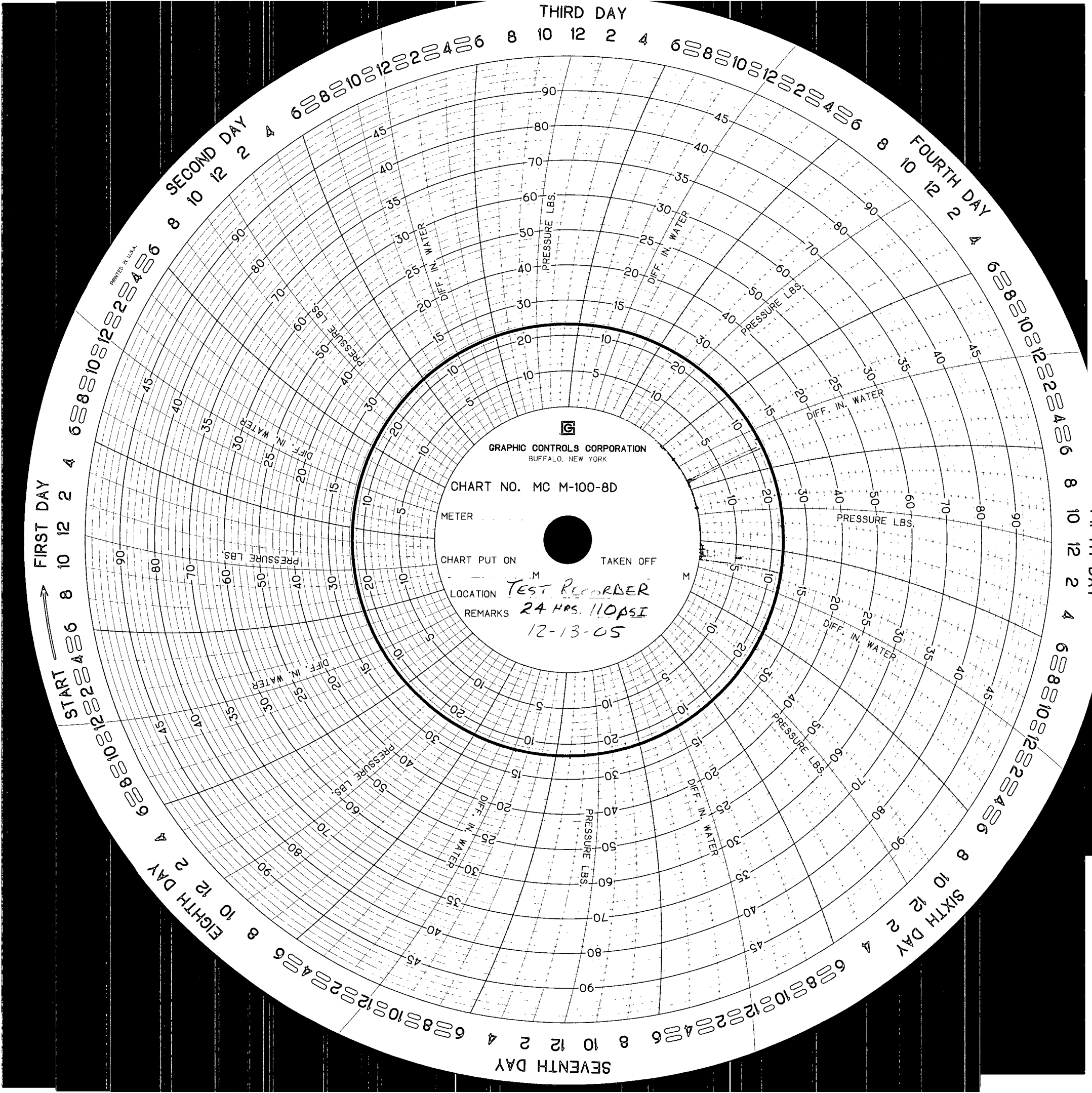
On December 21st, 2005 the Cooling Tower Blow Down & Lab Sink Sump Line to the CTB Over Flow Tank that has a normal operating pressure of 30 # psi was pressure tested by COPC personnel and a Key Energy Hot Oil Pump Truck to 95 # psi. The line would not hold pressure and after an investigation a leaking block valve was discovered and replaced. The line was again pressured up to 95 # psi which then stabilized at 90 # psi. As you can see by the enclosed chart copy the pressure test was run for 1 hour after the pressure had stabilized. Line tested well, no leaks.

If you have any questions or concerns please contact me at 505.391.3158 or 505.390.4821. Thank you for your time.

Sincerely,

Kenneth N. Andersen

Kenneth N. Andersen
HSER PSM Lead
Encolsure-4


GRAPHIC CONTROLS CORPORATION
BUFFALO, NEW YORK
CHART NO. MC M-100-8D
METER
CHART PUT ON
TAKEN OFF
LOCATION TEST RECORDER
REMARKS 24 HRS. 110 psi
12-13-05
FIRST DAY
SECOND DAY
THIRD DAY
FOURTH DAY
FIFTH DAY
SIXTH DAY
SEVENTH DAY
EIGHTH DAY
START
PRESSURE LBS.
DIFF. IN. WATER
PRINTED IN U.S.A.

GRAPHIC CONTROLS CORPORATION
BUFFALO, NEW YORK

CHART NO. MC MP-500

METER

12-20-05

CHART PUT ON M TAKEN OFF M

LOCATION PLANT SOUR NGL & Product Storage to CTB

REMARKS 1 Hour 10 min

6 AM 7 8 9 10 11 NOON 1 2 3 4 5 6 PM 7 8 9 10 11 MIDNIGHT

50 100 150 200 250 300 350 400 450

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GRAPHIC CONTROLS CORPORATION
BUFFALO, NEW YORK

CHART NO. MC MP-500

12-20-05

METER

CHART PUT ON M TAKEN OFF M

LOCATION PLANT H_2O to CTB

REMARKS FREE WATER KO

1hr. 10m.n

6 AM 7 8 9 10 11 NOON 1 2 3 4 5 6 PM 7 8 9 10 11 MIDNIGHT 1 2 3 4 5

450 400 350 300 250 200 150 100 50

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GRAPHIC CONTROLS CORPORATION
BUFFALO, NEW YORK

CHART NO. MC MP-500

METER

CHART PUT ON 12-21-05 M

TAKEN OFF M

LOCATION Cooling Tower Blow Down + LAB Sink Sump.

REMARKS 1 HR.

1st Test

2nd Test

6 AM 7 8 9 10 11 NOON 1 2 3 4 5 6 PM 7 8 9 10 11 MIDNIGHT 1 2 3 4 5

50 100 150 200 250 300 350 400 450

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OCD ENVIRONMENTAL BUREAU

SITE INSPECTION SHEET

DATE: 5-17-02 Time: 9 AM

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# 119

CENTRAL TANK BATTERY

FACILITY NAME: EVLRP / CO_2 RE-COMPRESION / CTB
PHYSICAL LOCATION: 32° 47" 44.2' N / 103° 27" 35.2' W
Legal: QTR___QTR___ Sec___ TS___ R___ County LEA

OWNER/OPERATOR (NAME) PHILLIPS PET CO.
Contact Person: LEE OWENS, Tele:#
MAILING ADDRESS: State ZIP
Owner/Operator Rep's:
BARRY MORGAN, CHRIS PARKS

OCD INSPECTORS: W PRICE, E MARTIN, R BAYLISS

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 # 1 - PROCESS AREA

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.

OK

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.

CTB - TURBINE LUBE OIL TANK NEEDS CONTAINMENT

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

OK

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.

PIC #2 CTB - POND

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.

ALL WASTE WATER RE-INJECTED

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.

EXCELLANT

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?

NONE

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

NONE

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

FRESH WATER FROM E. VAC. FIELD

15. Documents reviewed:

Miscellaneous Comments:

Photos taken: 2

Documents Reviewed/Collected:

Picture #1- Main Plant Process Area.


Picture #2- Central Tank Battery wastewater pond. (out of service).

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