



December 17, 2018

Project No. 14038-0036

Mr. Jason Hensley  
Plant Manager  
Castleton Commodities International, LLC  
99 Road 6500  
Kirtland, New Mexico 87417

Phone: (505) 598-5601  
email: [Jason.hensley@cci.com](mailto:Jason.hensley@cci.com)

**RE: ANNUAL INSPECTION OF FIVE (5) SUMPS AT THE SAN JUAN RIVER GAS PLANT,  
KIRTLAND, NEW MEXICO**

Dear Mr. Hensley,

Envirotech, Inc. (Envirotech) was contracted by Castleton Commodities International (CCI) to perform integrity inspection of the sumps located at the CCI San Juan Gas Plant, located in Kirtland, New Mexico (Site). The annual sump inspection is to satisfy the regulatory requirements of the New Mexico Oil Conservation Division (NMOCD) in accordance with CCI's discharge permit: *GW-033*.

Five (5) sumps of varying sizes and volumes are located throughout the Site. The five (5) sumps are identified as: *Sump #1*, *Sump #2*, *Sump #3*, *Sump #4* and *Sump #5*. Upon Envirotech's arrival on November 28, 2018, a site safety orientation was performed as well as a job safety analysis (JSA) to identify, eliminate or mitigate any hazards associated with the scope of work.

Additional contractors on-site included: High Tech Rental Tools (High Tech) and ABC Fire and Safety (ABC). High Tech was on site to remove all liquids from the sumps and ABC was on-site to provide rescue services due to a permitted confined space entrance on *Sumps 1* and *4*.

High Tech utilized a vacuum truck to remove the liquid contents of the sumps. Upon removal of the contents of *Sumps 1* and *4*, Envirotech personnel donned supplied air breathing apparatus and entered the sumps under a confined space entry permit. While inside the sumps, Envirotech personnel installed inflatable drain plugs, provided by CCI into the inlet and discharge piping of the sumps. Aided by intrinsically safe artificial lighting, Envirotech personnel performed visual inspections of the sumps, noting any corrosion, degradation or compromised integrity.

Inspection and drain plugging activities for *Sumps 3* and *5* were performed from outside the sumps and did not require a confined entry permit or supplied air breathing apparatus. Upon installation of the drain plugs and completion of the visual inspections, the sumps were filled with water to a level close to the top of the sump. The water level measurement was recorded and marked with

paint. The water was allowed to set in each sump for 24 hours then a subsequent measurement was recorded to complete the hydrostatic test.

Below please find the description of each sump, activities performed and results of the inspections:

#### Sump #1

- Steel sump approximately 72 inches wide by 48 inches long by 79 inches deep located outside the Amine Building.
- No visual cracks, defects, or compromised integrity was observed during inspection.
- Hydrostatic Test
  - Commenced at 1130 on November 28, 2018. Initial water level recorded at 5 inches below top flange and marked with paint.
  - Concluded at 1145 on November 29, 2018. Final water level recorded at 5 inches below the top flange and visually confirmed to be at the initial paint mark.
- *Sump #1* was determined to have passed the visual and hydrostatic test.

#### Sump #2

- Due to the equipment associated with *Sump #2* being *out of service*, a hydrostatic test was not conducted. *Sump #2* is considered to be *out of service*.

#### Sump #3

- Steel sump approximately 15 inches in diameter by 37 inches deep located inside the southeast corner of the boiler house.
- No visual cracks, defects, or compromised integrity was observed during inspection.
- Hydrostatic Test
  - Commenced at 1512 on November 28, 2018. Initial water level recorded at 3 inches below top flange and marked with paint.
  - Concluded at 1512 on November 29, 2018. Final water level recorded at 3 inches below the top flange and visually confirmed to be at the initial paint mark.
- *Sump #3* was determined to have passed the visual and hydrostatic test.

#### Sump #4

- Steel sump approximately six (6) feet wide by eight (8) feet long by 12 feet deep located on the north side of the plant.
- No visual cracks, defects, or compromised integrity was observed during inspection. However; due to historic sediment build-up on the bottom of the sump, a thorough inspection could not be conducted.
- Hydrostatic Test
  - Commenced at 1258 on November 28, 2018. Initial water level recorded at 45 inches below top flange and marked with paint.
  - On November 29, 2018, it was observed that the drain plug failed and allowed the water level to subside. Therefore, Envirotech personnel re-entered the tank under a confined entry permit and using supplied air to install a new plug.

- The sump was re-filled with water on November 29, 2018 at 1419. The new water level was recorded at 36 inches below top flange and marked with paint.
- Concluded at 1530 on November 30, 2018. Final water level recorded at 36 inches below the top flange and visually confirmed to be at the initial paint mark.
- *Sump #4* was determined to have passed the visual and hydrostatic test.

**Sump #5**

- Concrete sump approximately three (3) feet wide by seven (7) feet long by 1.5 feet deep located in the central area of the plant.
- Concrete within and around the sump was observed to chipped, pitted and degraded in areas during inspection.
- Hydrostatic Test
  - Commenced at 1502 on November 28, 2018. Initial water level recorded at 24  $\frac{3}{4}$  inches below top of concrete curb and marked with paint.
  - Concluded at 1502 on November 29, 2018. Final water level recorded at 24  $\frac{3}{4}$  inches below the top of concrete and visually confirmed to be at the initial paint mark.
- *Sump #5* was determined to have passed the visual and hydrostatic test.

Upon recording the final water levels, the water was drained out of the sumps. Envirotech personnel entered the *Sumps 1* and *4* under a confined space entry permit and utilizing a supplied air breathing apparatus to remove the plugs and the sumps were returned to normal operations.

*Sumps 1, 3, 4, and 5* were determined to have passed the visual and hydrostatic test and returned to service, *Sump 2* will maintain in *out of service* status.

We appreciate the opportunity to be of service. If you have any questions or if you need additional information, please contact our office at (505) 632-0615.

Sincerely,

**ENVIROTECH INC.**

  
for,

Isaac Garcia  
Environmental Field Technician  
[igarcia@envirotech-inc.com](mailto:igarcia@envirotech-inc.com)

Cc: Client File 14038