

GW-035

**General
Correspondence**

YEAR(S): 2008 - 2013

Lowe, Leonard, EMNRD

From: Kinard, Todd A. [Todd.A.Kinard@conocophillips.com]
Sent: Wednesday, November 23, 2011 8:25 AM
To: Lowe, Leonard, EMNRD
Subject: Inspection of Skimmer
Attachments: OCD Letter of GWDP 35-WQCC non applicability.pdf

Leonard,

We completed the inspection of our skimmer at the San Juan Gas Plant. We did not find any discrepancies in the integrity of the skimmer. Normally I would reference our discharge permit for this notification, but we received a letter rescinding our GW-035 permit on November 14, 2011. I have attached a copy of the letter. With that I am not sure how, who, or if I need to make this report to the OCD or not. Can you give me any guidance on this issue?

Thanks,

Todd Kinard

Compliance Coordinator

ConocoPhillips-San Juan Basin Gas Plant

P:505-632-4954

C:505-330-8309

F:505-632-4930

Lowe, Leonard, EMNRD

From: Jones, Brad A., EMNRD
Sent: Thursday, August 19, 2010 5:54 PM
To: Cox, Beverly J.; Lowe, Leonard, EMNRD
Cc: Searcy, Randy D.; Kamps, Kim; Kinard, Todd A.
Subject: RE: NORM Waste Approval Request

Beverly,

Thank you for providing the requested information. The OCD has reviewed ConocoPhillips' submittal regarding the removal the NORM contaminated sand from the San Juan Gas Plant (Discharge Permit GW-035) and the NORM contaminated refractory brick and PPE from the Wingate Fractionator (Discharge Permit GW-0054) and hereby approvals the proposal.

Please be advised that approval of this request does not relieve ConocoPhillips of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve ConocoPhillips of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If there are any questions regarding this matter, please do not hesitate to contact me.

Brad

Brad A. Jones
Environmental Engineer
Environmental Bureau
NM Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505
E-mail: brad.a.jones@state.nm.us
Office: (505) 476-3487
Fax: (505) 476-3462

From: Cox, Beverly J. [mailto:Beverly.J.Cox@conocophillips.com]
Sent: Thursday, August 19, 2010 1:50 PM
To: Lowe, Leonard, EMNRD; Jones, Brad A., EMNRD
Cc: Searcy, Randy D.; Kamps, Kim; Kinard, Todd A.; Cox, Beverly J.
Subject: RE: NORM Waste Approval Request

Brad,

As per our conversation today I am including the Ground Water Discharge Plan Permit numbers for the two ConocoPhillips Gas Plants that are requesting approval for NORM contaminated waste.

San Juan Gas Plant - GW-035
Wingate Fractionator - GW 054

Upon approval of this waste, this email will be filed with each individual discharge plan approved waste stream.

Let me know if you need additional documentation from us.

Thanks,

Beverly

Beverly J.
y, August 19, 2010 7:45 AM
onard, EMNRD; Jones Brad (brad.a.jones@state.nm.us)
andy D.; Kamps, Kim; Kinard, Todd A.; Cox, Beverly J.
ORM Waste Approval Request
High

ConocoPhillips has two Gas Plants located in the four corners area that has generated NORM contaminated waste.

The San Juan Gas Plant, located in Bloomfield, New Mexico, has discovered sand in a vessel that has NORM contamination. As per our discussion on July 16, 2010, ConocoPhillips has secured a contract company to remove and dispose of the NORM contaminated sand. The contractor has been approved by the New Mexico Radiation Control Bureau. We are scheduled to start this project on Tuesday, August 24.

In addition to this project, the Wingate Fractionator, located in Gallup, New Mexico, generated NORM contaminated refractory brick and PPE from a boiler unit during turnaround. The Wingate Fractionator is also seeking permission to dispose of their waste during the same time frame as the San Juan Gas Plant.

We are trying to capture a waste disposal efficiency by removing the NORM waste from both locations at the same time. The disposal site, EnergySolutions in Clive, Utah has been audited and approved through ConocoPhillips Corporate Waste Management.

Attached you will find

- NM Radiation Control Bureau approval letter
- Project Work Plan
- Waste analysis for the San Juan Gas Plant
- Waste analysis for the Wingate Fractionation Plant

Should you need additional information, please do not hesitate to call me on my cell at 281-236-4429 or via email.

Thanks,

Beverly

Work Plan and NM Radiation Control Bureau Approval

<< File: ConocoPhillips NORM Work Plan.doc >> << File: RECIPROCITY PERMAFIX-818145343-0001.pdf >>

San Juan Gas Plant Data

<< File: ARS1-10-01457.pdf >> << File: Total vs TCLP SJGP NORM Sand 080410.xls >> << File: San Juan Gas Plant TCLP Hg Analytical Results.pdf >>

Wingate Data

<< File: Test Results.pdf >>

Beverly J. Cox
Sr. Staff Environmental Technologist
Commercial Activities

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Wednesday, June 23, 2010 4:07 PM
To: 'Kinard, Todd A.'
Subject: RE: GW-035

Mr. Todd Kinard,

You are granted this OCD permission to do so. Please note this change within your next renewal application.

I'm sorry for the late response.

llowe

Leonard Lowe

Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505
Office: 505-476-3492
Fax: 505-476-3462
E-mail: leonard.lowe@state.nm.us
Website: <http://www.emnrd.state.nm.us/oed/>

From: Kinard, Todd A. [mailto:Todd.A.Kinard@conocophillips.com]
Sent: Monday, June 14, 2010 7:48 AM
To: Lowe, Leonard, EMNRD
Subject: FW: GW-035

Mr. Lowe,

Have you had opportunity to make a decision on this request? I will have opportunity to dispose of this material later this week if I can get approval.

Thanks,

Todd Kinard

Todd A.
June 07, 2010 7:58 AM
Kinard, EMNRD
Todd A.
W: GW-035

...ring if you have had opportunity to review the information listed below. I would like to be able to remove the gravel from the site during the next two weeks if possible.

Todd Kinard

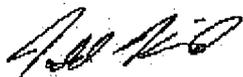
Todd A.
Jay, May 26, 2010 1:48 PM
_owe@state.nm.us
W-035

Mr. Lowe,

During recent plant cleaning activities (scraping road bases and leveling out areas) at the ConocoPhillips San Juan Gas Plant, a pile of gravel was generated for disposal. A sample of the gravel was collected and analyzed for TCLP Metals and TPH. Attached you will find a copy of the analysis report for TCLP and TPH.

We have received a prior authorization to amend our discharge plan at the San Juan Gas Plant to dispose of similar gravel at Envirotech Soil Remediation Facility, however we would like to dispose of the gravel at the Industrial Ecosystems remediation facility. We would also like to amend our discharge plan appendix F to show that either of these Remediation Facilities are acceptable. If you have question please feel free to email or call.

Thank You,



Todd Kinard
Compliance Coordinator
ConocoPhillips-San Juan Basin Gas Plant
P:505-632-4954
C:505-330-8309
F:505-632-4930

Client Name: Conoco Phillips San Juan Gas Plant

Address: PO Box 217

City, St Zip: Bloomfield, NM 87413

Attention: Todd Kinard

Date Received: 04/26/10

Date Reported: 05/12/10

Lab I.D.: 1004-124-01

Project Name: Gravel

Project Number:

Sample I.D.: Gravel

Sample Date: 04/26/10

Sample Time:

Date Extracted:

Date Analyzed:

ADHS No.

Sample Units

Sample Matrix Water

Default for ND

GAL ID No.: 1004-124-01

May 12, 2010

Conoco Phillips San Juan Gas Plant
PO Box 217
Bloomfield, NM 87413
Attention: Todd Kinard

Project Name: Gravel
Project Number:
Date Received: 04/26/10

This is to transmit the attached analytical report. The analytical data and information contained therein was generated using specified or selected methods contained in references, such as Standard Methods for the Examination of Water and Wastewater, 18th & 19th editions, Methods for Determination of Organic Compounds in Drinking Water, EPA-600/4-79-020, and Test Methods for Evaluating Solid Wastes, SW846.

Samples were received by Green Analytical Laboratories in good condition on 04/26/10.

If you should have any questions or comments regarding this report, please do not hesitate to call.

Sincerely,

Debbie Zufelt
Laboratory Manager

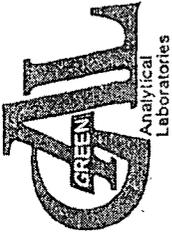
Enclosure

Green Analytical Laboratories, Inc.

METALS SRM

LAB ID#	SRM Data			
1004-124	SRM Result	True Value	SRM % Rec	Acceptance Range
Arsenic	5.12	5.00	102	90-110 %
Barium	2.51	2.50	100	90-110 %
Cadmium	2.52	2.50	101	90-110 %
Chromium	2.61	2.50	104	90-110 %
Lead	5.26	5.00	105	90-110 %
Mercury	0.00	0.00	90.0	90-110 %
Selenium	10.3	10.0	103	90-110 %
Silver	0.52	0.50	104	90-110 %

NA=Data not available



Cardinal
CHAIN OF CUSTODY RECORD

Page _____ of _____

Client: GREEN ANALYTICAL
 Contact: DEBBIE ZUFELT
 Address: 75 SUTTLE ST
DURANGO, CO 81303
 Phone Number: 970-247-4220
 FAX Number: 970-247-4227

NOTES:

- 1) Ensure proper container packaging.
- 2) Ship samples promptly following collection.
- 3) Designate Sample Reject Disposition.

PO# GA10-122
 Project Name: Geographical

FOR GAL USE ONLY
 GAL JOB # _____

Table 1. - Matrix Type
 1 = Surface Water, 2 = Ground Water
 3 = Soil/Sediment, 4 = Rinsate, 5 = Oil
 6 = Waste, 7 = Other (Specify) Gravel

Samplers Signature: _____

PLEASE CALL WITH ANY QUESTIONS

Sample ID	Collection		Miscellaneous				Preservative(s)					Comments	
	Date	Time	Collected by: (Init.)	Matrix Type From Table 1	No. of Containers	Sample Filtered ? Y/N	Unpreserved (Ice Only)	HNO3	HCL	H2SO4	NAOH		Other (Specify)
1A21 H19922- Gravel	5-14-10	14:50		7	2	✓	✓						Gravel 1005-067-01
2.													
3.													
4.													
5.													
6.													
7.													
8.													
9.													
10.													

Relinquished by: Debbie Zufelt Date: 5-18-10 Time: 1530
 Relinquished by: _____ Date: _____ Time: _____
 Received by: Jeff Henson Date: 5/19/10 Time: 14:10

* Sample Reject: [] Return [] Dispose [] Store (30 Days)

9.5°C #26 GA



May 20, 2010

Debbie Zufelt
Green Analytical Laboratories
75 Suttle Street
Durango, CO 81303

Re: 1005-067-01

Enclosed are the results of analyses for sample number H19922, received by the laboratory on 05/19/10 at 9:10 am.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method SW-846 8260	Benzene, Toluene, Ethyl Benzene, and Total Xylenes
Method TX 1005	Total Petroleum Hydrocarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.2	Regulated VOCs (V2, V3)

Accreditation applies to public drinking water matrices.

Total Number of Pages of Report: 3 (includes Chain of Custody)

Sincerely,

Celey D. Keene
Laboratory Director

Green Analytical Laboratories
75 Suttle Street
Durango, CO 81303

Conoco Phillips San Juan Gas Plant
PO Box 217
Bloomfield, NM 87413
Attention: Todd Kinard

GAL I.D.: 1004-124-01

Date Received: 04/26/10

Date Reported: 05/12/10

QC Batches:

PROJECT NAME:

PROJECT NUMBER:

SAMPLE I.D.: Gravel

Sample Date: 04/26/10

Sample Matrix: Water

Units: mg/L

TCLP Metals

RESULTS

PARAMETER	METHOD	REPORT		DILUTION	DATE	
		LIMIT	RESULT		ANALYZED	ANALYST
Arsenic	6010B	0.10	<0.10	1	05/06/10	jm
Barium	6010B	0.01	1.63	1	05/06/10	jm
Cadmium	6010B	0.01	<0.01	1	05/06/10	jm
Chromium	6010B	0.01	<0.01	1	05/06/10	jm
Lead	6010B	0.05	<0.05	1	05/06/10	jm
Mercury	7471A	0.0002	<0.0002	1	05/11/10	je
Selenium	6010B	0.20	<0.20	1	05/06/10	jm
Silver	6010B	0.01	<0.01	1	05/06/10	jm

Lowe, Leonard, EMNRD

From: Kinard, Todd A. [Todd.A.Kinard@conocophillips.com]
Sent: Thursday, December 10, 2009 7:36 AM
To: Lowe, Leonard, EMNRD
Subject: RE: San Juan Gas Plant (GW-035)

Mr. Lowe,
We have completed the construction of both projects. We did not conduct a hydrostatic test of TK-1300 on site. The manufacturer conducted this test at there facility, so it was not needed on site. If there is any other information that you need from me, please don't hesitate to ask.
Thank You,

Todd Kinard
Compliance Coordinator
ConocoPhillips-San Juan Basin Gas Plant
P:505-632-4954
C:505-330-8309
F:505-632-4930

From: Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]
Sent: Thursday, August 06, 2009 11:09 AM
To: Kinard, Todd A.
Cc: Cox, Beverly J.; Ritter, John T; Gutz, Joshua A
Subject: RE: San Juan Gas Plant (GW-035)

Mr. Kinard,

The OCD **approves** your plan to replace the existing earthen bermed tank to a new impermeable padded containment with smaller tank.

In section 2.6 *Commission New Tank TK-1300*: If you are to use tap water for these test. I would suggest that testing be done on the water before and after test. Test to WQCC 3103, except for Uranium, and Radioactivity. I will research this in more detail and will submit additional information.

The OCD **approves** your design for the new bins on the following condition:

The 2' x 5' troughs be used as sumps and not below grade tanks. Sumps are meant to catch fluids BUT not to contain them indefinitely. If fluids are kept within these sumps they will automatically be categories as Below-Grade tanks and will need to be re-engineered with a secondary containment with a leak detection system.

Thank you,

llowe

Leonard Lowe
Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505
Office: 505-476-3492
Fax: 505-476-3462

E-mail: leonard.lowe@state.nm.us
Website: <http://www.emnrd.state.nm.us/ocd/>

From: Kinard, Todd A. [mailto:Todd.A.Kinard@conocophillips.com]
Sent: Tuesday, July 28, 2009 8:54 AM
To: Lowe, Leonard, EMNRD
Cc: Cox, Beverly J.; Kinard, Todd A.; Ritter, John T; Gutz, Joshua A
Subject: FW: San Juan Gas Plant (GW-035)

Mr. Lowe,
I am sending this email to follow up on this request. Have you had opportunity to review the scope and drawings concerning this project? We are hoping to start this project by the end of the August. If you need anything else from me, don't hesitate to ask.

Thank You,

Todd Kinard

From: Kinard, Todd A.
Sent: Friday, July 10, 2009 1:17 PM
To: 'Leonard.Lowe@state.nm.us'
Subject: San Juan Gas Plant (GW-035)

Mr. Lowe,

The San Juan Gas Plant is notifying OCD of our intent to replace the existing earthen containment for the Equipment Lube Oil Tank TK-1300 with an impermeable containment to meet the facility Ground Water Discharge Permit (GW 035) requirements. In addition, the facility will replace the existing tank TK-1300 with a new smaller tank. We are also planning to construct a roll off dumpster landing area for 20 yard roll off dumpsters. I have attached a scope of work for these projects as well as a spreadsheet showing the projected locations and the engineering design drawings for the new tank, containment for the tank, and the dumpster landing area.

I am always available for questions if needed.
Thank You,

Todd Kinard
Compliance Coordinator
ConocoPhillips-San Juan Basin Gas Plant
P:505-632-4954
C:505-330-8309
F:505-632-4930

<<SJGP TK1300 Replacement Environmental Plan - FINAL(REV3-9july09).doc>> <<Appendix C 2006 Tank Containment Location Plot Plan.xls>>

This inbound email has been scanned by the MessageLabs Email Security System.

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Thursday, August 06, 2009 11:09 AM
To: 'Kinard, Todd A.'
Cc: Cox, Beverly J.; Ritter, John T; Gutz, Joshua A
Subject: RE: San Juan Gas Plant (GW-035)

Mr. Kinard,

The OCD **approves** your plan to replace the existing earthen bermed tank to a new impermeable padded containment with smaller tank.

In section 2.6 *Commission New Tank TK-1300*: If you are to use tap water for these test. I would suggest that testing be done on the water before and after test. Test to WQCC 3103, except for Uranium, and Radioactivity. I will research this in more detail and will submit additional information.

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Thank you,

llowe

Leonard Lowe

Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505
Office: 505-476-3492
Fax: 505-476-3462
E-mail: leonard.lowe@state.nm.us
Website: <http://www.emnrd.state.nm.us/ocd/>

From: Kinard, Todd A. [<mailto:Todd.A.Kinard@conocophillips.com>]
Sent: Tuesday, July 28, 2009 8:54 AM
To: Lowe, Leonard, EMNRD
Cc: Cox, Beverly J.; Kinard, Todd A.; Ritter, John T; Gutz, Joshua A
Subject: FW: San Juan Gas Plant (GW-035)

Mr. Lowe,

I am sending this email to follow up on this request. Have you had opportunity to review the scope and drawings concerning this project? We are hoping to start this project by the end of the August. If you need anything else from me, don't hesitate to ask.

Thank You,

Todd Kinard

From: Kinard, Todd A.
Sent: Friday, July 10, 2009 1:17 PM
To: 'Leonard.Lowe@state.nm.us'
Subject: San Juan Gas Plant (GW-035)

Mr. Lowe,

The San Juan Gas Plant is notifying OCD of our intent to replace the existing earthen containment for the Equipment Lube Oil Tank TK-1300 with an impermeable containment to meet the facility Ground Water Discharge Permit (GW 035) requirements. In addition, the facility will replace the existing tank TK-1300 with a new smaller tank. We are also planning to construct a roll off dumpster landing area for 20 yard roll off dumpsters. I have attached a scope of work for these projects as well as a spreadsheet showing the projected locations and the engineering design drawings for the new tank, containment for the tank, and the dumpster landing area.

I am always available for questions if needed.

Thank You,

Todd Kinard
Compliance Coordinator
ConocoPhillips-San Juan Basin Gas Plant
P:505-632-4954
C:505-330-8309
F:505-632-4930

<<SJGP TK1300 Replacement Environmental Plan - FINAL(REV3-9july09).doc>> <<Appendix C 2006 Tank Containment Location Plot Plan.xls>>

This inbound email has been scanned by the MessageLabs Email Security System.

PROJECT PLAN

San Juan Gas Plant TK-1300 Replacement and Impermeable Containment Construction

DATE: 9 July 2009
REV: REV3 – Approved for Use

1.0 SUMMARY

The San Juan Gas Plant intends to replace the existing earthen containment for the Equipment Lube Oil Tank TK-1300 with an impermeable containment to meet the facility Ground Water Discharge Permit (GW 035) requirements. In addition, the facility will replace the existing tank TK-1300 with a new smaller tank. As with the existing tank, the new tank will be inspected for mechanical integrity on a regular basis under the facility Asset and Operations Integrity program. This project plan describes the work plan for the existing tank removal, disposal and new construction and operation of the new equipment.

1.1 AFFECTED EQUIPMENT DESCRIPTION

This project affects the following equipment as described below.

1.1.1 Existing- Equipment Lubrication Oil Storage Tank TK-1300

- This item will be removed from service, cleaned and disposed of as described in the work plan below.
- Installed in 1994, 100bbl vertical steel storage tank
- Stores new refined petroleum lubrication oil.

1.1.2 New – Equipment Lubrication Oil Storage Tank TK-1300

- This item will replace the existing TK-1300.
- New steel construction, single wall UL-142 and NFPA 30-2008 compliant lubrication storage tank.
- Nominal 560 gallon capacity.
- Horizontal cylinder set on elevated saddles for complete external tank inspection.
- Stores new refined petroleum lubrication oil.
- Atmospheric – Non-Pressurized working pressure. Emergency vent sized to NFPA 30-2008 requirements.
- Ambient storage & working temperatures.

1.1.3 Existing – Equipment Lubrication Oil Storage Tank TK-1300 Containment

- This item will be modified as described in the work plan below.
- Provides containment for current TK-1300.
- Earthen dike impoundment, no impermeable liner.
- Environmental inspection and testing is described in the work plan below.

1.1.4 New – Equipment Lubrication Oil Storage Tank TK-1300 Containment

- This item will be constructed for the new tank TK-1300 to meet the GW035 requirements.
- Designed to contain at least 150% of the maximum volume of the new tank, TK-1300
- Containment to be constructed of reinforced concrete.
- Final dimensions and design will be determined during detailed engineering.

2.0 WORK PLAN

This project will include the following objectives as summarized below:

- 2.1 Existing tank TK-1300 removal.
- 2.2 Environmental inspection of TK-1300 worksite.
- 2.3 Disposal of TK-1300.
- 2.4 Preparation of former TK-1300 containment basin area for new unit.
- 2.5 Construct new impermeable containment basin and install new tank, TK-1300
- 2.6 Commission and put new tank into service.
- 2.7 New tank operation & inspection.

2.1 Existing Tank TK-1300 Removal

1. Pump remaining tank product into appropriate lube oil storage containers.
2. Disconnect all tank piping and equipment.
3. Inspect tank interior to verify as much product as possible has been removed, in addition, verify tank bottom is in sound condition. If tank bottom appears to have leaked, see item 2.2 below.
4. Lift existing and relocate to the facility skimmer basin.

2.2 Environmental Inspection of Worksite

1. Thoroughly inspect existing tank bottom externally for signs of leaking. If tank bottom appears to have leaked, continue to Item 3 below.
2. If there are no signs of leakage, then based on that the tank has no history of previous leaks or spills, non-corrosive service and newer service date of 1994, the area will be deemed free of contamination and will be ready for new construction.
3. If signs of leakage have been identified, then further environmental testing and remediation will be required. Refer to company environmental specialists and the current facility *Ground Water Discharge Plan GW 05* and *NM Title 19 Chapter 15* regulations for further testing, remediation and reporting requirements.

2.3 Disposal of TK-1300

1. Refer to *ConocoPhillips Waste Management Level 2 Compliance Procedure SJO 06-E21-PR*, approved *Ground Water Discharge Plan GW 05* to properly manage and dispose of waste generated by this work.
2. At the skimmer basin, wash out the tank with detergent. All tank waste product will be sent to the skimmer pit for separation and disposal per the facility waste management plan and approved *Ground Water Discharge Plan GW 05*.
3. Once the tank has been cleaned and cleared of all remaining contaminants, perform the *ConocoPhillips Naturally Occurring Radioactive Materials (NORM) Level 2 Compliance Procedure - SJWG 06-OH09-Pr*, to verify the tank is free of NORM.
4. The tank is now deemed clear for disposal, and will be disposed of either for transfer to another ConocoPhillips location or other acceptable disposal facilities.

2.4 Preparation of Site for New TK-1300

1. Once items 2.1 and 2.2 have been completed, the existing site is ready for rework.
2. The existing earthen dike structure will be totally removed and the site prepared for the new concrete basin.

2.5 Construct New TK-1300 Concrete Containment Basin

1. Build new concrete containment basin and install new tank per the approved Authorized For Construction civil engineering drawings.

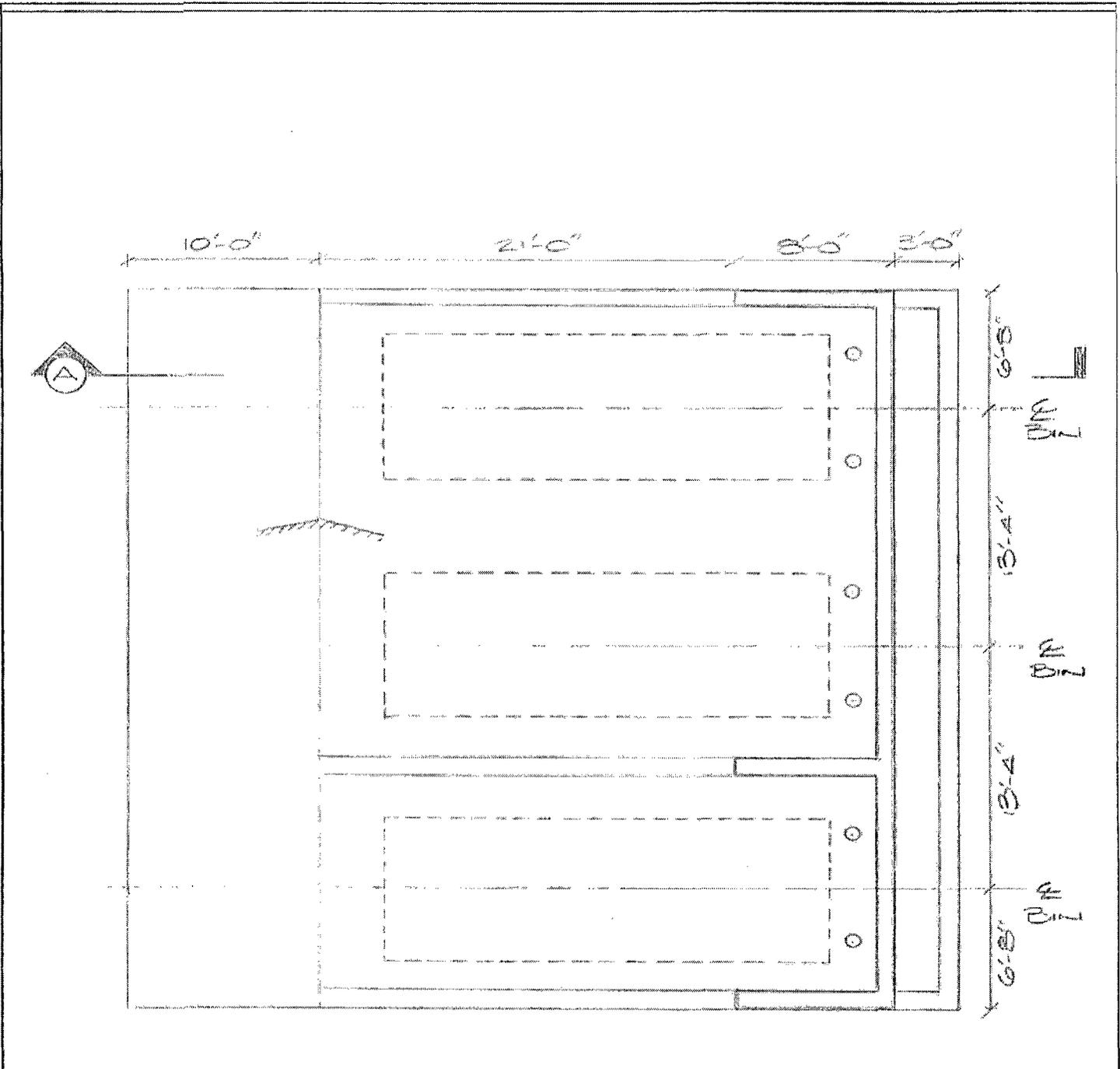
2.6 Commission New Tank TK-1300

1. Perform hydrostatic water leak test to verify tank and fittings integrity. Repair any leaks and redo the leak test following any repair. → used water
2. Commission the new tank following the company approved cleaning procedure. All cleaning wastes generated shall be disposed of properly per the Discharge Plan.
3. Fill the new tank with new product. Perform visual leak inspection. Immediately note and repair any leaks.
4. Once the tank has been proven to work effectively, no visual leaks are found and the MOC process has been completed, then the tank may be deemed to be in normal service.

2.7 New Tank TK-1300 Operation & Inspection

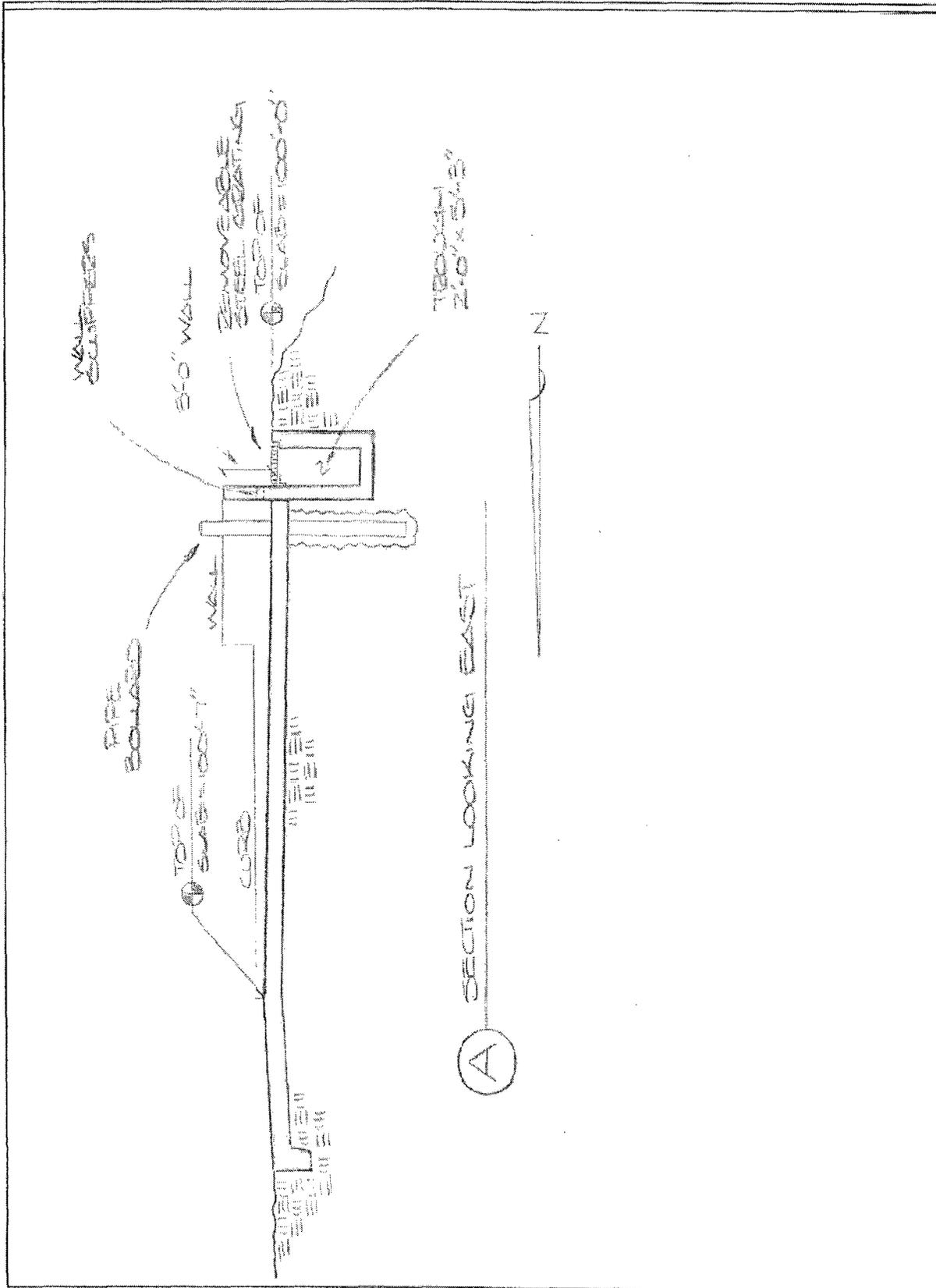
1. Once the tank is under normal operational service, it will be inspected under the facility Asset and Operational Integrity program for mechanical integrity assurance of mechanical process equipment. Currently, the tank will be inspected annually by a certified inspector to assess, monitor and document the mechanical integrity of the tank against applicable industry standards. The inspection frequency and scope may change in the future with code and company policy revisions.
2. Reference: *ConocoPhillips Aboveground Storage Tank Inspection, Testing, and Repair Level 2 A&OI Procedure -SJWG 07-HSE16-TK-Pr*

SAN JUAN GAS PLANT
APRON SLAB FOR WASTE BINS

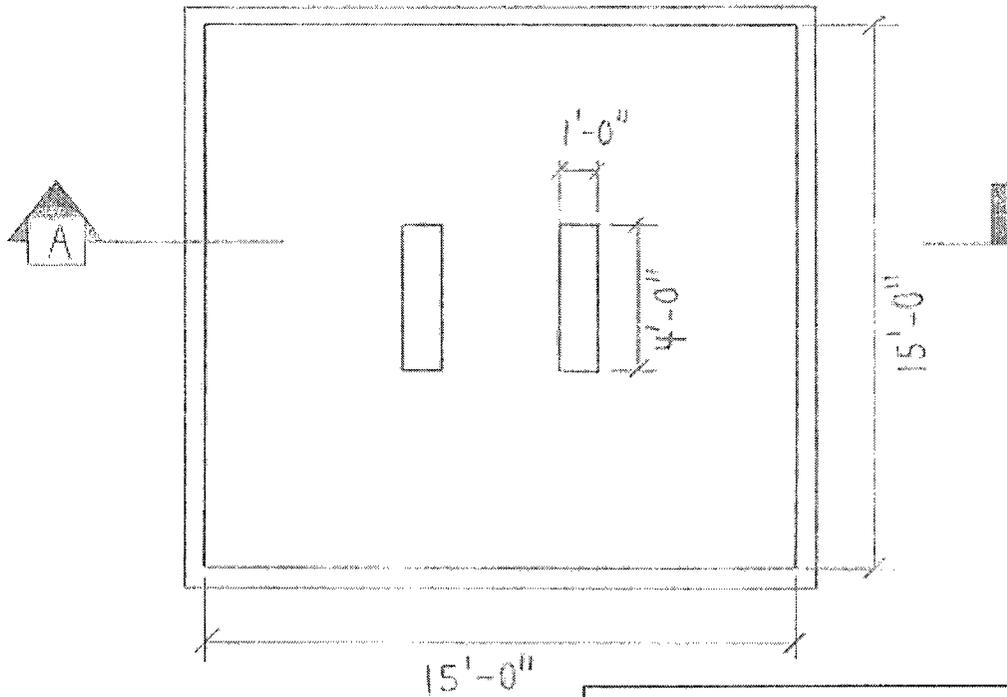


N PLAN VIEW

SAN JUAN GAS PLANT
APRON SLAB FOR WASTE BINS



PRELIMINARY-NOT FOR CONSTRUCTION

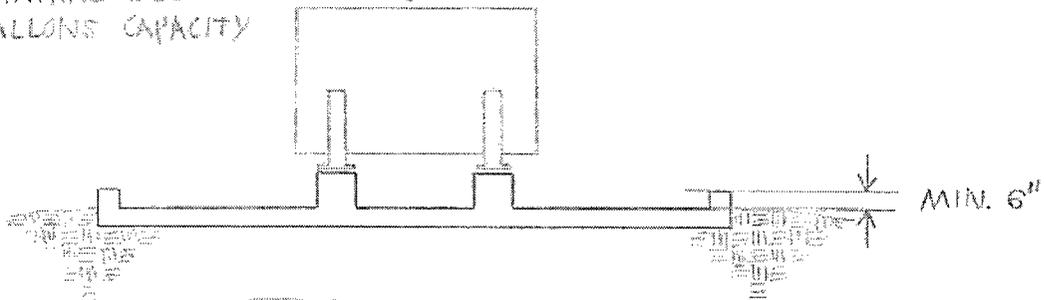


PLAN VIEW

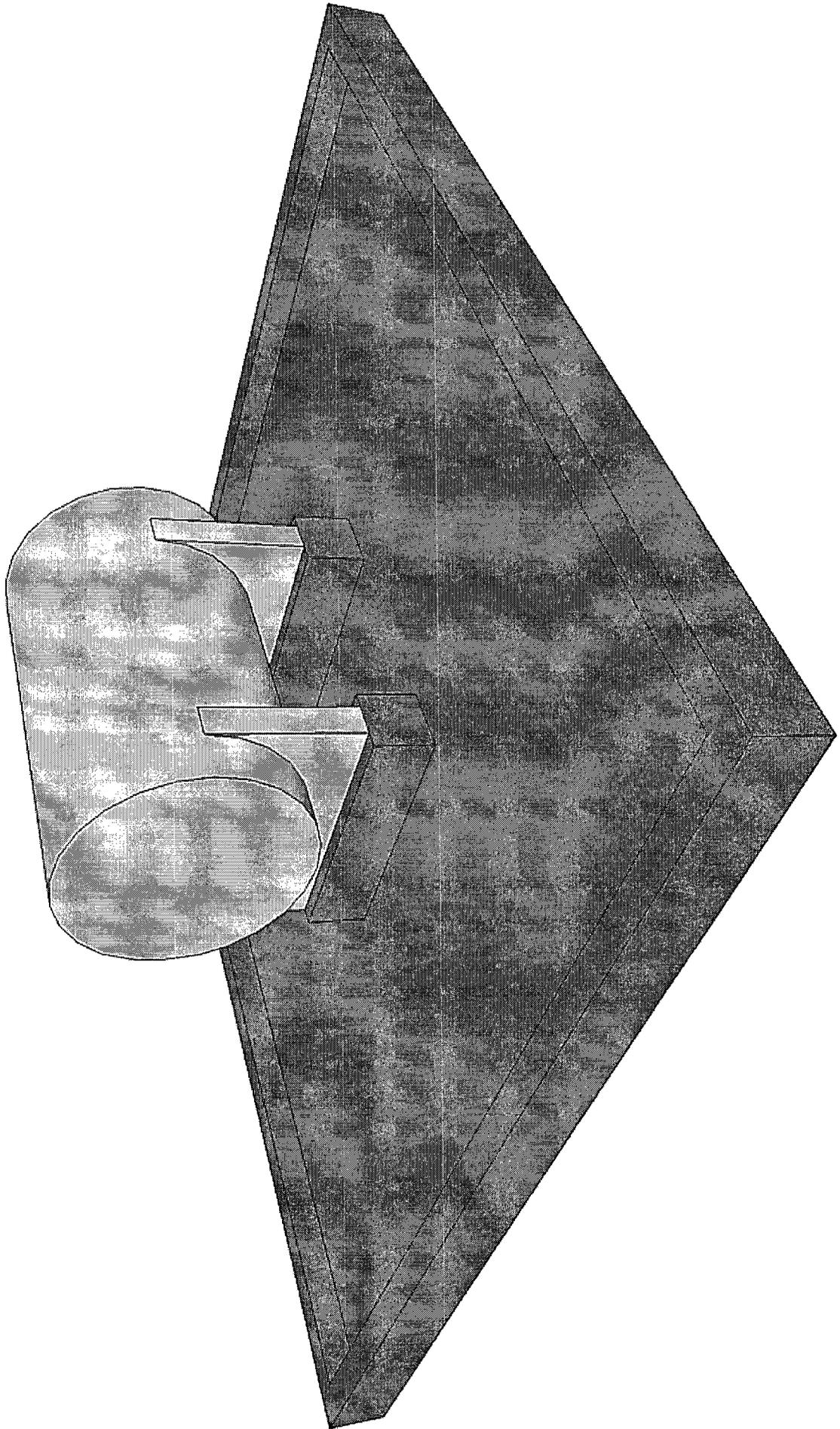
NOTES:

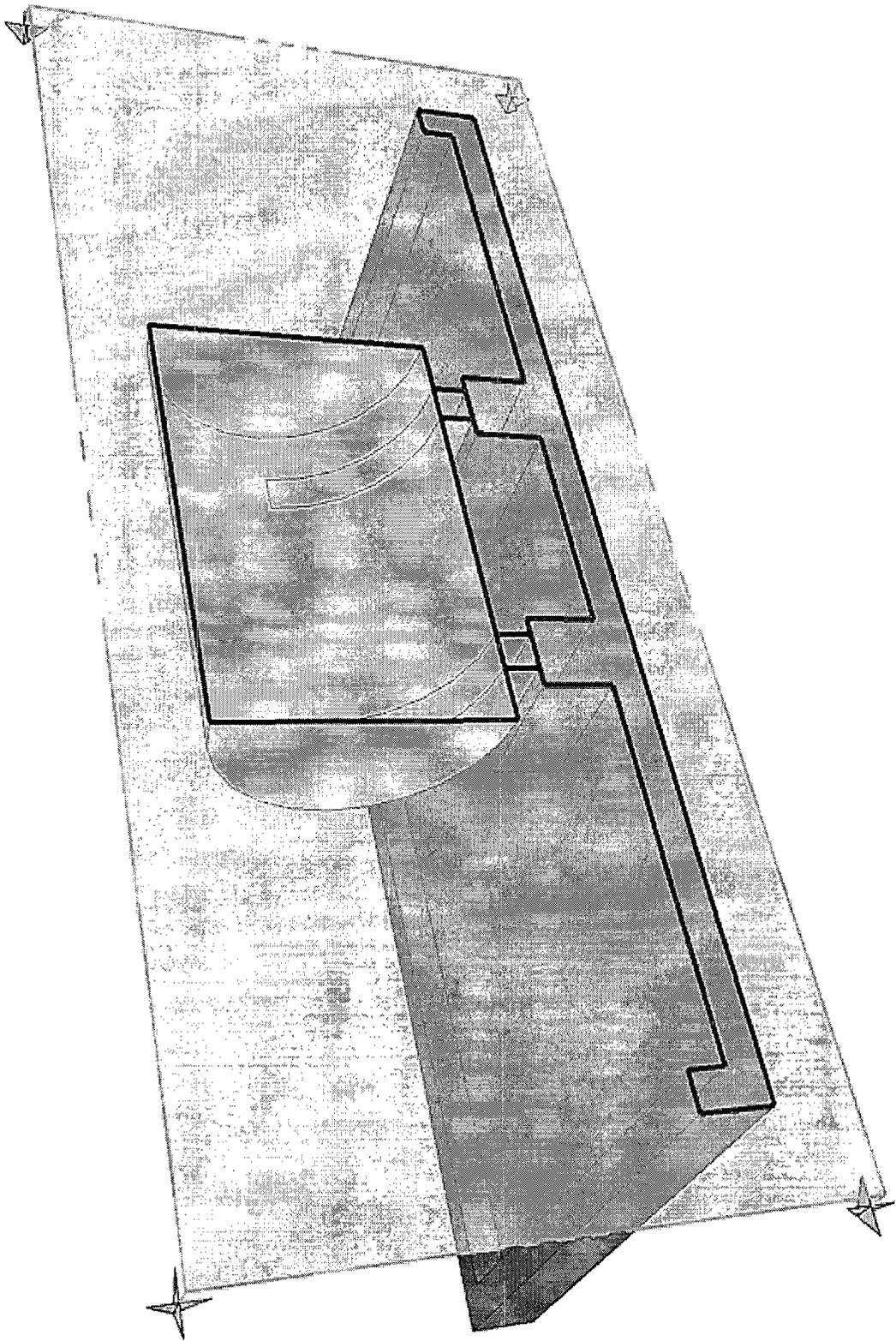
- 1) ALL DIMENSIONS ARE APPROXIMATE AND TO BE FINALIZED DURING DETAILED CONSTRUCTION.
- 2) TOTAL PLANNED CONTAINED VOLUME OF 841 GALLONS BASED ON 150% CONTAINMENT OF PLANNED 560 GALLON STORAGE TANK.
- 3) TANK CONTAINMENT BASIN WILL BE OF REINFORCED CONCRETE CONSTRUCTION.

46" DIA x 72" LONG
NOMINAL 560
GALLONS CAPACITY



A SECTION





Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Friday, July 25, 2008 9:35 AM
To: 'Kinard, Todd A.'
Subject: RE: San Juan Gas Plant GW-035 Temporary tank request.

Todd:

Your request is approved. Please send the results of the API test to me for our record. 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/ocd/index.htm>
(Pollution Prevention Guidance is under "Publications")

From: Kinard, Todd A. [mailto:Todd.A.Kinard@conocophillips.com]
Sent: Friday, July 25, 2008 9:21 AM
To: Chavez, Carl J, EMNRD
Subject: RE: San Juan Gas Plant GW-035 Temporary tank request.

Carl,

This is an API 653 tank that is due for inspection. We have not had any indication of leaking, nor do we suspect that this tank is leaking.

Todd Kinard
Compliance Coordinator
ConocoPhillips-San Juan Basin Gas Plant
P:505-632-4954
C:505-330-8309
F:505-632-4930

From: Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]
Sent: Friday, July 25, 2008 9:10 AM
To: Kinard, Todd A.
Subject: RE: San Juan Gas Plant GW-035 Temporary tank request.

Todd:

Is the inspection mandated under the API or what has precipitated the cleaning and internal inspection? Is this a problem tank that you suspect is leaking? Thanks.

Carl J. Chavez, CHMM

7/25/2008

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/ocd/index.htm>
(Pollution Prevention Guidance is under "Publications")

From: Kinard, Todd A. [mailto:Todd.A.Kinard@conocophillips.com]
Sent: Friday, July 25, 2008 8:59 AM
To: Chavez, Carl J, EMNRD
Subject: San Juan Gas Plant GW-035 Temporary tank request.

Carl,

I am going to need to set a temporary 500 BBL tank to facilitate the cleaning and internal inspection of TK-1403 (produced water tank). I am requesting to place this tank on the ground. I will increase the inspections to daily for any signs of leakage. If COP notices a release we know we will be subject to Rule 116. From the time the tank is placed in service, this will be an approximately 30 day temporary operation. If you need any further information, or just have questions please email or call.

Thank You,

Todd Kinard
Compliance Coordinator
ConocoPhillips-San Juan Basin Gas Plant
P:505-632-4954
C:505-330-8309
F:505-632-4930

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7/25/2008

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Wednesday, May 07, 2008 9:23 AM
To: 'Kinard, Todd A.'
Subject: RE: GW-035 & Temporary Tank Notification for Turn Around- 30 days

Todd:

Approved. 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/ocd/index.htm>
(Pollution Prevention Guidance is under "Publications")

From: Kinard, Todd A. [<mailto:Todd.A.Kinard@conocophillips.com>]
Sent: Wednesday, May 07, 2008 8:10 AM
To: Chavez, Carl J, EMNRD
Subject: RE: GW-035 & Temporary Tank Notification for Turn Around- 30 days

Carl,

We will establish an inspection sheet and monitor the portable tanks twice daily to verify that we do not have any leakage. Knowing that if leakage does occur that we will be subject to the requirements of Rule 116. I know that I told you we would be using the portable tanks for about 30 days. We may move them on site for set up about 2 weeks prior to use. Will that present any problems? We can certainly start monitoring them at the time they are delivered.

Thank you for the information and quick response.

Todd Kinard

From: Chavez, Carl J, EMNRD [<mailto:CarlJ.Chavez@state.nm.us>]
Sent: Tuesday, May 06, 2008 1:26 PM
To: Kinard, Todd A.
Subject: RE: GW-035 & Temporary Tank Notification for Turn Around- 30 days

Todd:

You have a couple of options. You can temporarily place a liner down with construct temporary berms around the 500 bbl. tanks during the turn around, or you can place them on the ground, and increase your inspections to daily for any signs of leakage during removal or during inspection. If COP notices a release you are subject to Rule 116. If the release impacts waters of the state, then other problems may arise. Since this is 30 day temporary operation at max., please let me know what you decide to do. Perhaps COP already has some bermed areas w/ liner that it may use for the turn around.

5/7/2008

The OCD does not wish to inhibit COP's activities during the turn around and are operating in good faith in the event a release(s) occurs in accordance with Rule 116, or any other applicable state or federal regulation, the OCD will be notified.

Please retain this documentation on site in the event an OCD Inspector questions your activities. 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")

From: Kinard, Todd A. [mailto:Todd.A.Kinard@conocophillips.com]
Sent: Tuesday, May 06, 2008 1:01 PM
To: Chavez, Carl J, EMNRD
Subject: GW-035

Mr. Chavez,

During our turnaround in June of 2008, we are going to need to set some temporary tanks for Amine storage and to facilitate cleaning of our Amine contactor. In accordance with our Ground Water Discharge plan, I am providing you with email notification. Can you provide me with the requirements for temporary tank installation? If you have any further questions, please email or call.

Thank You,

Todd Kinard
Compliance Coordinator
ConocoPhillips-San Juan Basin Gas Plant
P:505-632-4954
C:505-330-8309
F:505-632-4930

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5/7/2008