

GW-054

**General
Correspondence**

YEAR(S): 2010 - 2014

Lowe, Leonard, EMNRD

From: Cox, Beverly J. [Beverly.J.Cox@conocophillips.com]
Sent: Tuesday, June 12, 2012 2:49 PM
To: Lowe, Leonard, EMNRD
Cc: Timmerman, Sherry A; Cox, Beverly J.; Jones, Brad A., EMNRD
Subject: FW: Wingate Fractionator BGT Leak Detection

Leonard,

I sent this email to Brad and he suggested that I forward you this email and work with you on this issue. As stated below the Wingate below grade tank (bgt) retrofit was completed Friday, June 8, 2012. Monitoring of the space between the liners on Monday, June 11th indicated a liquid level approximately 1 to 1-1/2 inches. We believe this liquid to be a result of condensation between the liners.

The bgt maintains a water level of approximately 2-3 feet. Should a leak occur, the level between the liners would be equalized, which they are not; the water entering the bgt is hotter than the air space between the liners, which would cause condensation; the sampling pipe was sealed off from the atmosphere not allowing the space to breath which also contributes to condensation and there was no increase in the water level between the liners from Monday to Tuesday monitoring.

The facility is waiting on a geotech pump to arrive so that the small amount of fluid can be pulled for sampling. The facility will test for conductivity and phosphates for comparison analysis to the waste water. These test are run daily on the facility boiler water and other water used in the plant which are eventually discharged into the bgt. Once the sample has been analyzed i will follow-up with another email.

Thanks,

Beverly

From: Cox, Beverly J.
Sent: Tuesday, June 12, 2012 1:28 PM
To: Jones Brad (brad.a.jones@state.nm.us)
Cc: Timmerman, Sherry A; Cox, Beverly J.
Subject: Wingate Fractionator BGT Leak Detection

Brad,

As per my voice mail today, I am following up on original phone call on Monday, June 11, 2012.

The Wingate Fractionator has completed the below grade tank (bgt) retrofit on Friday, June 8, 2012. At the close of the day on Friday, June 8, 2012, the facility personnel inspected the bgt liner space and found no liquids. On Monday morning, June 11, 2012, the liner space was inspected again and approximately 1 to 1-1/2 inches of water was detected. A sample will be collected from the liner space and tested and the results will be compared to the constituents of the bgt waste water.

We believe that the water between the liners is a result of condensation due to the heat of the water entering the bgt and the lack of circulation between the liners. The inspection pipe was sealed off from the atmosphere over the weekend not allowing it to breath.

Once we get the results in, we will provide a follow-up email.

Please call should you have questions or need more information.

bj

Beverly J. Cox
Sr. Staff Environmental Technologist, CESCO
Commercial Activities
Gathering & Processing
832-486-2887 Cell: 281-236-4429



New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

John H. Bemis
Cabinet Secretary-Designate

Brett F. Woods, Ph.D.
Deputy Cabinet Secretary

Jami Bailey
Division Director
Oil Conservation Division



JANUARY 30, 2011

Ms. Beverly Cox
ConocoPhillips Company
P.O. Box 291
Houston, Texas 77252-2197

Dear Ms. Cox:

The Oil Conservation Division (OCD) has reviewed your responses to the "Oil & Gas Facilities Questionnaire for Determination of a WQCC Discharge Permit" for the ConocoPhillips Wingate Fractionator Gas Plant (GW-054). OCD requests that you provide us with additional information. ConocoPhillips indicates that discharges at this facility include:

- Fresh water hydroblasting exchanger tube bundles (annual – approximately 2000-3000 gallons)
- Boiler steam hoses and system vents (intermittent during winter months and freezing conditions – approximately 50 gallon/day / summer months 30 gallons/day)
- Cooling tower basin water washing/cleaning overspray (annual – approximately 100 gallons)
- High pressure washing; spraying cement walkways, mud from carts, dirt from containments (intermittent – approximately 500 gallons/month)
- Fire Fighting water deluge system (quarterly testing – approximately 200 gallon/quarter)

OCD's Questionnaire asks, "Are there any routine activities at the facility which intentionally result in materials other than potable water being released either onto the ground or directly into surface or ground water?" OCD is only concerned with the discharge of "water contaminants," as defined at 20.6.2.7AAA NMAC. Please detail whether any of the above discharges include "water contaminants" which are being discharged to the ground or whether the discharges are being properly contained and disposed of. For example, does the cleaning of the exchanger tube bundles occur directly on the ground or on an impermeable surface with a sump to collect the runoff?

Three of the five listed discharges appear to be part of a cleaning process where fresh water may become contaminated with "water contaminants." However, if the cleaning fluids are properly collected and are not discharged directly to the ground, then OCD will conclude that no intentional discharge is occurring during the cleaning process. The boiler steam hoses and system vents appear to involve the emission of gases rather than aqueous discharges. The fire

Ms. Beverly Cox

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fighting water deluge system testing appears to involve only fresh water that does not come into contact with a "water contaminant."

Please provide OCD with the additional information by February 27, 2012. Based on your responses, OCD will determine whether to require ConocoPhillips to submit a discharge permit renewal application. If you have any questions regarding this matter, please contact Glenn von Gonten at 505-476-3488.

Thank you for your cooperation.

A handwritten signature in black ink, appearing to read "Jami Bailey". The signature is fluid and cursive, with a large initial "J" and "B".

Jami Bailey
Director

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Thursday, December 08, 2011 11:38 AM
To: 'Timmerman, Sherry A'
Subject: FW: Wingate Fractionating Gas Plant -- Cooling Water Treatment Change Notification

Sherry Timmerman,

NMOCD acknowledges your notification. This effort does not constitute a major modification and is administratively approved.

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: Timmerman, Sherry A
Sent: Friday, December 02, 2011 6:57 AM
To: Leonard.lowe@state.nm.us
Cc: Glenn.VonGonten@state.nm.us; Cox, Beverly J.; Aparicio, Gabriel
Subject: Wingate Fractionating Gas Plant -- Cooling Water Treatment Change Notification

Leonard,

In accordance with Wingate Fractionating Gas Plant (GW-054) Discharge Permit Approval Condition 5, ConocoPhillips is providing notification of a change in cooling water treatment chemicals. Within the next 60 days, ConocoPhillips plans to replace GenGard GN8108 with a combination of GenGard GN8144 and Flogard MS6209. It is anticipated these chemicals will provide more effective corrosion protection in the primary cooling system and higher zinc discharge levels to the evaporation ponds.

If you require additional information or have questions or comments, please advise.

Regards.

Sherry Timmerman

Compliance Coordinator
Office: 1.505.863.1003
Cell: 1.505.360.3032

Wingate Fractionator

P. O. Box 119

Rehoboth, NM 87322-0119

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Friday, August 05, 2011 10:12 AM
To: 'Kamps, Kim'
Subject: RE: GW-054 Wingate Fractionator - Request for Minor Modification to Waste Streams, Table 8-1

Approved.

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: Kamps, Kim [<mailto:Kimberly.D.Kamps@conocophillips.com>]
Sent: Thursday, August 04, 2011 2:14 PM
To: Lowe, Leonard, EMNRD
Subject: GW-054 Wingate Fractionator - Request for Minor Modification to Waste Streams, Table 8-1

Leonard,

Would you review the attached requested updates to Table 8-1 of Section 8 (Liquid and solid Waste Collections / Storage / Disposal) of our Ground Water discharge Plan, GW-054? I have made changes as follows:

Removed Red Rock Regional Landfill from some of the waste streams as shown on the redline. You may recall that I requested to remove this landfill from some of our waste streams in March of this year. I have found that I can not get the landfill added to ConocoPhillips approved list for some additional industrial waste streams and so I have updated the list to remove the site from these streams.

The last waste stream listed is C(3)(N) - Zeolite Resin Beads. All of this material was removed from our site and disposed of at a Waste Management facility earlier this year. We will no longer use this material in our process or need to dispose of it. The reference in the plan should be removed.

Regards,

Kim Kamps
Products Supervisor
ConocoPhillips - Wingate Fractionator
Office 505.863.1023
Mobile 505.870.1559

Kim Kamps E-mail Attachment

GWOSA WINDGATE - Minor Mod Request - to Waste disposal Sites As Redlined 8/4/11

Other wastes generated at the facility are disposed of at OCD approved locations that are also on ConocoPhillips approved disposal site list. Table 8-1 lists the potential waste generated.

Table 8-1			
19.15.35.8 NMAC-Reference	Liquid / Solid Waste	Storage	Disposal
C(1)(n)	Absorbent Material/Pads (used and dry)	Waste Dumpsters	Waste Management Solid Waste Facility, Safety Kleen, or Red Rock Regional Landfill
C(1)(n)	Absorbent Material/Pads (used and wet)	Drum	Waste Management Solid Waste Facility, Safety Kleen, IEI, or Envirotech Inc. (based on paint filter test)
C(2)(a)	Spent Alumina (used in air service)	Not Stored	Waste Management Solid Waste Facility, Safety Kleen, IEI, or Envirotech Inc. (based on analysis or process knowledge)
C(2)(a)	Spent Alumina (used in hydrocarbon service)	Not stored	Waste Management Solid Waste Facility, Safety Kleen, IEI, or Envirotech Inc. (based on analysis or process knowledge)
C(1)(e)	Asbestos	All items are properly wrapped, sealed, and stored in a covered and locked roll-off container.	Keers Environmental
C(1)(a)	Barrels, drums, 5-gallon buckets, 1-gallon containers; RCRA empty per 40 CFR 261.7	containment pad	Recycled, returned to vendor, Waste Management Solid Waste Facility, Safety Kleen or Red Rock Regional Landfill Based on what they contained.
C(1)(b)	Brush and vegetation arising from clearing operations; uncontaminated	East of facility	Waste Management Solid Waste Facility or Red Rock Regional Landfill
C(3)(b)	Catalysts	Not Stored	Recycled by Manufacturer
C(3)(e)	Concrete (contaminated)	Point of generation or East of	Waste Management Solid Waste Facility, Safety Kleen, IEI, or

Table 8-1 19.15.35.8 NMAC Reference	Liquid / Solid Waste	Storage	Disposal
		Facility	Envirotech Inc. (based on analysis or process knowledge)
C(1)(c)	Concrete (uncontaminated)	East of Facility	Waste Management Solid Waste Facility or Red Rock Regional Landfill
C(1)(d)	Construction Debris (uncontaminated)	East of Facility	Waste Management Solid Waste Facility or Red Rock Regional Landfill
C(3)(n)	Contaminated PPE (w/Iron Sulfide, e.g. gloves, tyvek suit).	Drums	Safety Kleen or Envirotech for Incineration (based on analysis or process knowledge)
C(2)(e)	Cooling Tower Filters	Drums	Waste Management Solid Waste Facility, Safety Kleen, IEI, or Envirotech Inc. (based on analysis or process knowledge)
C(3)(n)	Copper Sweep	Not Stored	Waste Management Solid Waste Facility, Safety Kleen, IEI, or Envirotech Inc. (based on analysis or process knowledge)
C(1)(d) C(3)(f)	Demolition Debris	Near Site Of Generation	Waste Management Solid Waste Facility or Red Rock Regional Landfill (based on analysis or process knowledge)
C(1)(f)	Detergent Buckets (empty)	Waste Dumpsters	Waste Management Solid Waste Facility, Safety Kleen or Red Rock Regional Landfill
C(3)(g)	Dry and Wet Unused Chemicals	Original Container	Return to vendor if possible, Safety Kleen, Waste Management Solid Waste Facility, IEI, or Envirotech Inc. (based on analysis or process knowledge)

2/10

Table 8-1			
19.15.35.8 NMAC Reference	Liquid / Solid Waste	Storage	Disposal
Liquid waste – N/A Solids – C(3)(n)	E & P Exempt Waste (e.g. separator, fluid/water, process fluid/water, solids/sludges from tank bottoms)	Not Stored	Liquid - Basin Salt Water Disposal Solids - Waste Management Solid Waste Facility, Safety Kleen, or Envirotech Inc. (based on analysis or process knowledge)
C(3)(n)	Engine Water Filters (spent/used – non-contact water)	Waste Dumpsters	Waste Management Solid Waste Facility, Red- Rock-Regional-Landfill or Safety Kleen (based on analysis or process knowledge)
C(2)(i)	Ferrous Sulfate or Elemental Sulfur (Iron Sponge – contaminated)	Drums	Waste Management Solid Waste Facility, Safety Clean, IEI, or Envirotech Inc. (based on analysis)
C(1)(i)	Ferrous Sulfate or Elemental Sulfur (uncontaminated)	Drums	Waste Management, Safety Kleen, IEI or Envirotech
C(1)(g)	Fiberglass Tanks RCRA empty per 40 CFR 261.7, cut up/shredded.	Waste Dumpsters	Waste Management Solid Waste Facility, Safety Kleen, IEI, Red- Rock-Regional-Landfill or Envirotech. Based on what they contained.
C(2)(g)	Gas Condensate Filters (inlet product filters – spent)	Drums	Waste Management Solid Waste Facility, IEI, Envirotech Inc., or Safety Kleen for Incineration (based on analysis or process knowledge)
C(1)(h)	Grease Buckets RCRA empty per 40 CFR 261.7	Waste Dumpsters	Waste Management Solid Waste Facility or Red-Rock-Regional- Landfill
C(3)(n)	Lube Oils (spent/used)	Tank	Recycled - Safety Kleen – East Chicago Refinery
C(1)(o)	Lumber / Pallets Scrap (uncontaminated)	Next to Waste Dumpsters or East Side of Facility	Waste Management Solid Waste Facility or Red Rock Regional Landfill
C(3)(l)	Lumber / Pallets Scrap (contaminated)	At point of generation or in	Waste Management Solid Waste Facility, IEI, Safety Kleen, or

Table 8-1			
19.15.35.8 NMAC Reference	Liquid / Solid Waste	Storage	Disposal
		containment pad	Envirotech Inc. (based on analysis or process knowledge)
C(3)(n)	Mercaptan Filters (spent/used)	Special Container / Drum	Safety Kleen, IEI, or Envirotech
C(1)(j)	Metal Plate / Metal Cable / Junk Iron / Punched Empty Aerosol Cans	East Side of Facility (cans not stored).	Waste Management Solid Waste Facility or Recycled
C(2)(k)	Molecular Sieve	Not Stored	Recycled by vendor if possible, Waste Management Solid Waste Facility, Safety Kleen, IEI, or Envirotech Inc. (based on analysis)
C(1)(k)	Office / Domestic Trash	Waste Dumpsters	Waste Management Solid Waste Facility or Red Rock Regional Landfill
C(2)(o)	Oil Filters (used)	Enclosed Drain Box until dry	Waste Management Solid Waste Facility, Red Rock-Regional-Landfill-or recycled (based on analysis or process knowledge)
C(3)(n)	Paint Chips (dried)	Drums	Waste Management Solid Waste Facility, IEI, Safety Kleen or Envirotech Inc. (based on analysis or process knowledge)
C(3)(n)	Painting Waste	Drum	Safety Kleen, IEI, or Envirotech
C(3)(n)	Pipe Scale (deposits removed from non-contact water equipment)	Drums	Waste Management Solid Waste Facility, Safety Kleen, IEI, or Envirotech
C(2)(l)	Pipe Scale (deposits removed from petroleum hydrocarbon pipeline and process equipment)	Drums/Tanks	Waste Management Solid Waste Facility, Safety Kleen, IEI, or Envirotech (based on analysis or process knowledge)
C(2)(l)	Pipe Scale, Deposits (removed from	Drums/Tanks	Safety Kleen, IEI, or Envirotech (based on analysis or process

Table 8-1 19.15.35.8 NMAC Reference	Liquid / Solid Waste	Storage	Disposal
	petroleum hydrocarbon pipeline e.g. pigging residue potentially containing iron sulfide)		knowledge)
C(1)(j)	Pipes & Valves (used in non-contact water services)	East Side of Facility	Waste Management Solid Waste Facility or recycled
C(2)(j)	Pipes & Valves (used in petroleum hydrocarbon services)	East Side of Facility	Waste Management Solid Waste Facility or Recycled (based on analysis or process knowledge)
C(1)(m)	Plastic Pit Liners (cleaned)	Waste Dumpsters	Waste Management Solid Waste Facility
C(1)(n)	Rags / Gloves (dry)	Waste Dumpsters	Waste Management Solid Waste Facility, or Red-Rock-Regional Landfill
C(2)(n)	Sandblasting Sand (spent/used)	Drums	Waste Management Solid Waste Facility, IEI, Safety Kleen, or Envirotech Inc. (based on analysis or process knowledge)
C(1)(j)	Scrap Metal	East side of plant	Recycled
C(3)(c)	Soil (contaminates other than petroleum)	Drums	Waste Management Solid Waste Facility, Safety Kleen, IEI, or Envirotech, Inc. (based on analysis or process knowledge)
C(3)(n)	Soil (petroleum hydrocarbon contaminated)	Stored near the point of generation until disposal site is determined.	Waste Management Solid Waste Facility Safety Kleen, Envirotech, or IEI (based on analysis or process knowledge)
C(2)(k)	Support Balls	Not Stored	Part of Molecular Sieve waste
C(3)(k)	Tower Packing Materials	Not Stored	Waste Management Solid Waste Facility, Safety Kleen, IEI, or Envirotech, Inc. (based on analysis or process knowledge)

Table 8-1			
19.15.35.8 NMAC Reference	Liquid / Solid Waste	Storage	Disposal
C(3)(n)	Universal Waste (lead acid & gel packed batteries)	Sealed Containers	Safety Kleen, Envirotech or recycled
C(3)(n)	Universal Waste (florescent tubes)	Florescent Tube Container	Safety Kleen or Envirotech
C(3)(n)	Non-Universal Waste Florescent tubes (Green Bulbs)	Waste Dumpsters	Waste Management Solid Waste Facility or Red-Rock-Regional Landfill
C(3)(n)	Zeolite Resin Beads	Not Stored	Waste Management Solid Waste Facility (based on process knowledge)

Remove - no longer
Onsite

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Monday, March 21, 2011 10:15 AM
To: 'Kamps, Kim'
Subject: RE: GW-054 Wingate Fractionator - Request for Minor Modification to Waste Streams, table 8-1

Kim Kamps,

NMOCD Santa Fe appreciates your response. Thank you for the update.

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: Kamps, Kim [<mailto:Kimberly.D.Kamps@conocophillips.com>]
Sent: Friday, March 18, 2011 7:42 AM
To: Lowe, Leonard, EMNRD
Subject: RE: GW-054 Wingate Fractionator - Request for Minor Modification to Waste Streams, table 8-1

Leonard,

See my responses in blue below.

Kim Kamps

From: Lowe, Leonard, EMNRD [<mailto:Leonard.Lowe@state.nm.us>]
Sent: Friday, March 11, 2011 4:54 PM
To: Kamps, Kim
Subject: RE: GW-054 Wingate Fractionator - Request for Minor Modification to Waste Streams, table 8-1

Ms. Kim Kamps,

An e-mail with information attached with information about modification will suffice for updates to your discharge permit GW-054.

Just two inquires so far.

- CONOCOPHILLIPS: Added the requirement that waste disposal sites must be on the ConocoPhillips approved list as well as being approved by the OCD.

OCD INQUIREY: The noted disposal sites added, were they already used by ConocoPhillips for such efforts before? And now they are just being referenced within the application? This is

correct. ConocoPhillips has always had an approved waste site list. These sites are audited / reviewed on a three year basis. However corporate is now pushing enforcement within the company. So if I send to a site approved by OCD on my GWDP, I'm not protected from our own internal auditing if it has 'fallen' off our internal list. If there are personnel changes at our site this should help avoid any confusion internally about where we can send waste. Sometime our own internal auditors are harder on us than our Regulators.

OCD RESPONSE: Approved.

- CONOCOPHILLIPS: Added vendors as highlighted in blue: Safety Kleen, IEI, Envirotech

OCD INQUIREY: Are these vendors new to receiving waste from this ConocoPhillips site? Or are they just now being referenced within the application?

Our site has not previously sent waste to IEI. However, IEI is on the ConocoPhillips approved list and our production units in the San Juan Basin / Farmington area use them. Our site has sent waste to both Envirotech and Safety Kleen, but you can see from the list that Envirotech is listed for some types of waste and Safety Kleen for others. In talking to Beverly Cox, I understand that this was primarily over cost and these cost comparisons predate my time at the Wingate Plant. I'd like to specify disposal vendors in line with our internal approved list since I know they will get reviewed internally. Cost is a secondary issue to proper disposal.

OCD RESPONSE: Approved.

- CONOCOPHILLIPS: Removed Tierra Environmental as disposal site, no longer ConocoPhillips approved site

OCD INQUIREY: OKAY.

- CONOCOPHILLIPS: Removed Red Rock Regional Landfill from Spent Alumina, Copper Sweep, Unused Chemicals, Elemental Sulfur (Ferrous Sulfate) & Plastic Pit Liners

OCD INQUIREY: OKAY

- CONOCOPHILLIPS: Noted that asbestos is properly wrapped and stored in a locked and covered roll-off

OCD INQUIREY: OKAY

- CONOCOPHILLIPS: Containers sent to landfill are RCRA empty per 40 CFR 261.7, not triple washed

OCD INQUIREY: OKAY

- CONOCOPHILLIPS: Removed Activated Carbon from waste stream list. No longer used at this site.

OCD INQUIREY: OKAY

- CONOCOPHILLIPS: Added 'wet', now Dry and Wet Unused Chemicals

OCD INQUIREY: OKAY

Please respond.

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: Kamps, Kim [<mailto:Kimberly.D.Kamps@conocophillips.com>]
Sent: Friday, March 11, 2011 3:11 PM
To: Lowe, Leonard, EMNRD
Subject: GW-054 Wingate Fractionator - Request for Minor Modification to Waste Streams, table 8-1

Leonard,

Would you review the attached requested updates to Table 8-1 of Section 8 (Liquid and Solid Waste Collections / Storage / Disposal) of our Ground Water Discharge Plan, GW-054. I primarily added additional vendor options for various waste streams. I also removed a vendor that is no longer on our internal approved list and removed Red Rock Regional Landfill from some items that our internal policies prohibit us from putting in their landfill. I've tried to summarize the changes below and I highlighted additions to the table in blue on the attachment.

- Added the requirement that waste disposal sites must be on the ConocoPhillips approved list as well as being approved by the OCD.
- Added vendors as highlighted in blue: Safety Kleen, IEI, Envirotech
- Removed Tierra Environmental as disposal site, no longer ConocoPhillips approved site
- Removed Red Rock Regional Landfill from Spent Alumina, Copper Sweep, Unused Chemicals, Elemental Sulfur (Ferrous Sulfate) & Plastic Pit Liners
- Noted that asbestos is properly wrapped and stored in a locked and covered roll-off
- Containers sent to landfill are RCRA empty per 40 CFR 261.7, not triple washed
- Removed Activated Carbon from waste stream list. No longer used at this site.
- Added 'wet', now Dry and Wet Unused Chemicals

I have not submitted a request for modification before so I'm not sure if e-mail is acceptable method. If you would like a hard copy and signed original request letter in the mail please let me know.

Regards,

Kim Kamps
Compliance Coordinator
ConocoPhillips - Wingate Fractionator
Office 505.863.1023
Mobile 505.870.1559

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 approves 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
Kinard, EMNRD; Jones Brad (brad.a.jones@state.nm.us)
Kinard, 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: Jones, Brad A., EMNRD
Sent: Tuesday, August 24, 2010 9:17 AM
To: Kamps, Kim
Cc: Lowe, Leonard, EMNRD
Subject: RE: Methanol Disposal - 2nd Try

Kim,

The OCD hereby approval the removal of the methanol from the ConocoPhillips Wingate Fractionator facility (Discharge Permit GW- 054). It is the OCD's understanding that ConocoPhillips will provide Safety Kleen the methanol for recycling. Please provide follow-up documentation that demonstrates Safety Kleen's receipt of the methanol.

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: Kamps, Kim [mailto:Kimberly.D.Kamps@conocophillips.com]
Sent: Wednesday, August 18, 2010 4:41 PM
To: Jones, Brad A., EMNRD
Subject: FW: Methanol Disposal - 2nd Try

From: Kamps, Kim
Sent: Wednesday, August 18, 2010 4:39 PM
To: brad.a.jones@state.nm.us
Subject: FW: Methanol Disposal

Brad,

Per our phone discussion, MSDS sheet attached. I will follow-up with manifest paperwork.

Kim

From: Kamps, Kim
Sent: Wednesday, August 18, 2010 1:45 PM
To: Lowe, Leonard, EMNRD
Subject: Methanol Disposal

Leonard,

We are emptying and removing an old methanol tank. I have approximately 550 gallons of methanol that I would like to dispose of with Safety Kleen out of Farmington, NM. This is not in our usual waste stream so I am requesting your approval. Methanol will be recycled as fuel. If you could respond to me as soon as possible I can still have this picked up this week. I do not want to keep it around the plant any longer than I have to. It is currently in 55 gallon steel drums in our containment area.

Thanks in advance,

Kim Kamps
Compliance Coordinator
ConocoPhillips - Wingate Fractionator
Office 505.863.1023
Mobile 505.870.1559

Lowe, Leonard, EMNRD

From: Jones, Brad A., EMNRD
Sent: Tuesday, August 24, 2010 9:17 AM
To: Kamps, Kim
Cc: Lowe, Leonard, EMNRD
Subject: RE: Methanol Disposal - 2nd Try

Kim,

The OCD hereby approval the removal of the methanol from the ConocoPhillips Wingate Fractionator facility (Discharge Permit GW- 054). It is the OCD's understanding that ConocoPhillips will provide Safety Kleen the methanol for recycling. Please provide follow-up documentation that demonstrates Safety Kleen's receipt of the methanol.

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

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