GW-054

QUESTIONNAIRE

2011

Gas Activities – Gathering & Processing
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ConocoPhillips

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GW-54

March 16, 2012

Oil Conservation Division
Energy Minerals and Natural Resources Department
Mr. Glenn von Gonten
1220 South St. Francis Drive
Santa Fe, NM 87505

RE: Response to Additional Information Request for Facilities Questionnaire Determination

Mr. von Gonten,

As per our phone conversation February 28, 2012, ConocoPhillips Wingate Fractionator is responding to the letter dated January 30, 2012 which was received via email on February 28, 2012. ConocoPhillips understands that that the OCD is concerned with whether water contaminates are being discharged to the ground specifically for three of the five listed discharges on the Oil & Gas Facilities Questionnaire. A more detailed explanation of these activities is described below.

When the term "cleaning" is used it is referring to the use of high pressure fire fighting water (non-chemically treated) as a means of removing a surface build up or just to flush out the pipe/tubes. All fresh water used for these activities flow to the facility drainage system and catchment basins. These fluids do not come in contact with hydrocarbons or leave the facility until inspected. ConocoPhillips owns and operates four water wells that provide water to the facility. The water deemed "fire fighting water" is raw water that comes from the four water wells. This is the same water that is used in the fire fighting water deluge system.

The facility water chemist was consulted regarding the potential for introducing water contaminants as a result of "cleaning" the tube bundles and the cooling tower. Should scale or deposits other than debris be removed from the tube bundles, this would indicate a failure in the facility water treatment program which could lead to a catastrophic failure of equipment. Water testing and analysis occurs daily to assure that the water treatment program is working.

Details of the three water discharge streams that refer to "cleaning" are discussed below.

- **Fresh water hydroblasting exchanger tube bundles (annual – approximately 2000-3000 gallons):** Exchanger tube bundles contain purified water that is treated by eco-friendly water soluble chemicals to a purity that eliminates scaling and impurities from the water. In preparation for lancing (flushing out) the tube bundles, the cooling water is drained back into the process system and exchanger is depressurized leaving no water in the tube bundles. A high pressure spray system utilizes the facility fire fighting water to rinse/flush-out the tubes removing any debris that may have carried over from the cooling tower basin.

Such debris could be stick/wood pieces, Styrofoam, paper, dirt and rocks, etc. Due to high winds, this type of debris is blown into the cooling tower basin and is picked up by the pump suction distributing the debris thru the tube bundles. The volume of water utilized for lancing the tube bundles has decreased significantly over the last couple of years. The decrease is due to the improved water maintenance and mechanical integrity programs of the equipment. Improved efficiency of the equipment used by the service contractors has also helped in the decrease of water used. Since these changes/improvements have been made, approximately 700 - 1000 gallons of fresh water is used on an annual basis. This work is usually conducted in June when higher evaporation rates are in place due to higher temperatures and low humidity.

- **Cooling tower basin water washing/cleaning overspray (annual – approximately 100 gallons):** The facility fire fighting water is used to rinse the sides of the cooling tower removing sediments created by daily environmental conditions; dust and wind and some calcium, carbonate and sulfate deposits. The rinse water and deposits run down the exterior walls, and are captured in the cooling tower basin. The calcium and sulfate deposits are water soluble thus returning to a liquid once mixed with the cooling tower water. During the rinsing process, some water will splash off the cooling tower walls onto the ground.

- **High pressure washing; spraying cement walkways, mud from carts, dirt from containments (intermittent – approximately 500 gallons/month):** The facility fire fighting water is used to rinse the dirt and mud from the cement walkways and dirt that accumulates in containment. This dirt and mud accumulates by natural means and when personnel walk thru wet/muddy areas transferring mud from their boots to the cement walkways or into containment areas. Prior to removing mud from the carts, the equipment is inspected for residual oils. Removed deposits are inspected to ensure no residual oils are mixed with the mud. If residual oils are detected, the mud is collected, contained and disposed as per OCD regulations.

ConocoPhillips would like to also clarify a statement on the January 30, 2012 letter regarding "emission of gases" from the steam hoses. As stated, there are steam hoses that are used during the winter months to protect equipment from freezing. The vapor from the steam vents and hoses are steam vapors and not emission of product gases.

Do not hesitate to call me should you have questions or need more information.

Sincerely,

Beverly J. Cox

Beverly J. Cox

cc: Lane Ayers, Manager, San Juan Gas Plants (via email)
Sherry Timmerman - Wingate Fractionator Plant

GW-54

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

May 12, 2011

Oil & Gas Facilities Inventory Questionnaire for Determination of a WQCC Discharge Permit

Only Water Quality Control Commission- regulated systems will be incorporated into the OCD's WQCC Permits, while OCD regulated systems will be handled under separate permit(s). A current discharge permit is valid until its normal expiration date or November 15, 2012, whichever is later. All facilities with processes subject to the Water Quality Act must have permits in place by November 16, 2012. H2S Contingency Plans; pits, ponds, above and/or below-grade tanks; waste treatment, storage and disposal; and landfarms and landfills may require separate permitting under the OCD Oil, Gas, and Geothermal regulations.

*Proper completion and timely submission of this questionnaire **for all facilities** is requested. Please complete and submit a separate questionnaire for each facility **before July 15, 2011**.*

- **Name of the owner or operator of the facility**

ConocoPhillips Company

- **Point of contact**
  Name: Beverly Cox
  Telephone: 832-486-2887
  Email: beverly.j.cox@conocophillips.com
  Mailing address: PO Box 2197
  Houston, Texas 77252-2197

- **Facility name: Wingate Fractionation Plant**

- **Facility location**
  Unit Letter, Section, Township, Range S9-10 & 15-17, T15N, R7W
  Street address (if any) 68 El Paso Circle
  Gallup, NM 87301

- **Facility type**
  ☐ Refinery ☒ Gas Plant ☐ Compressor
  ☐ Crude Oil Pump Station ☐ Injection Well ☐ Service Company
  ☐ Geothermal ☐ Abatement
  ☐ Other (describe)

- **Current and Past Operations** (please check all that apply)
  ☒ Impoundments ☐ Treatment Plant ☐ Waterflood
  ☐ Disposal Well ☐ Brine Well ☐ Wash Bay
  ☒ Steam Cleaning ☒ Groundwater Remediation

• **Facility Status** ☒ Active ☐ Idle ☐ Closed

• **Does this facility currently have a discharge permit?** ☒ Yes ☐ No

If so, what is the permit number? GW - 054_____

• **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?**
(This includes process activities, equipment maintenance, or the cleanup of historic spills.)
☒ Yes ☐ No

If so, describe those activities including the materials involved, the frequency of discharge, and the estimated volume per discharge event.
*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)

• **What is the depth below surface to shallowest ground water in the area?** ____20 feet confined_____

• **Are there any water supply, groundwater monitoring, or recovery wells at the facility?**
Water supply ☒ Monitoring ☒ Recovery ☐

If these wells are registered with the Office of the State Engineer (OSE), what are the OSE well numbers?___Water Well No. 3 (G00001) and Water Well No. 4 (G00002)

• **Are abatement actions ongoing?** _No – there is one contaminated pocket of confined water that is monitored and allowed to self attenuate

• **Are there any active or inactive UIC wells present as part of the federal Underground Injection Control program associated with this facility?** ☐ Yes ☒ No

If so, what are the API numbers assigned to those wells?
N/A

• **Are there any sumps at the facility?** ☒ Yes ☐ No
Number of sumps with volume less than 500 gallons_____
Use and contents_____
Is secondary containment incorporated into the design? ☐ Yes ☐ No

Number of sumps with volume greater than 500 gallons 1 (sump scheduled for retrofitting with secondary containment and leak detection before the end of the current permit term _____
Use and contents cooling tower and blowdown water with a slip stream of sewage_____
Is secondary containment incorporated into the design? ☐ Yes ☒ No

- **Does the facility incorporate any underground lines other than electrical conduits, freshwater, natural gas for heating, or sanitary sewers?** ☒ Yes ☐ No

  If so, what do those buried lines contain?

  *hydrocarbon line containing propane and butane(s) which is gaseous at atmospheric conditions
  *hydrocarbon lines containing natural gasoline (condensate)
  *blowdown waste water
  *Natural gas line for fuel supply to engines/equipment

THIS FORM IS DUE TO THE OIL CONSERVATION DIVISION BY JULY 15, 2011.

Questions? Please contact Glenn VonGonten at 505-476-3488 or Carl Chavez at 505-476-3490.

Thank you for your cooperation.

JAMI BAILEY
Director