Gas Processing Facility Inspection Form

Section 1: General Information

Operation Data	Inspection Data
Operator Name: NW Gas Processing LLC / SROG	Inspector Name: James Thum
Location Name: **Little Willow Gas Gathering Facility**	Area Office: Boise / Director's office
Authorized Contact: Dan Johanek (208) 707-7867 Tyler Hartung (208) 412-5475 Mike Shafer via Tyler	Inspection Date: 10/19/2022 12:15 PM
County: Payette	Report Date: 10/20/2022
Inspector's Signature: /signed/ James Thum **Date of Signature:** 10/20/2022	**Inspection Summary:** ☐ Operation appeared to be in compliance at the time of the inspection. ☒ Issues of concern identified at the time of the inspection.

Location Description: 4649 Little Willow Road, Payette ID 83661. SE side of Little Willow Road, 2.5 miles NE of the intersection of Idaho SR 52, 6 miles east of Payette ID. Facility now staffed part-time by Mike Shafer since Feb. 2022. Reach him through Tyler. SPL was testing/calibrating fuel use meters when I arrived.

Weather- Sunny with some high clouds, 57° F slight variable breeze.

Section 2: Location of Plant — IDAPA 20.07.02.430

1. Is the facility located at least 300 feet from :
   (Only mark N/A for Original Portion of Hwy 30 Plant or LW Facility as constructed prior to 4/11/2015)
   - A. Existing Occupied Structures? ☒ N/A ☐ Yes ☐ No
   - B. Water Wells? ☒ N/A ☐ Yes ☐ No
   - C. Canals and Ditches? ☒ N/A ☐ Yes ☐ No
   - D. Natural or Ordinary High Water Mark or Surface Waters? ☒ N/A ☐ Yes ☐ No
2. If the answer to A or B above is no, is there express written Permission from the owners of the above to allow the facility to be closer than 300 feet? ☒ N/A ☐ Yes ☐ No
3. If there is owner permission for the above to be closer than 300 feet, are water wells and existing occupied structures at least 100 feet from the plant? ☒ N/A ☐ Yes ☐ No

Section 3: Operations — IDAPA 20.07.02.430

1. Has the operator notified the department of which wells, by API number, are being served by the facility? ☒ Yes ☐ No
2. Does the operator have a flaring permit from the IDEQ? ☒ Yes ☐ No
3. Do the staff demonstrate knowledge of all operations and locations of:
   - A. Emergency shut off equipment? ☒ Yes ☐ No
   - B. Direction of Flow Lines? Marked by arrows ☒ Yes ☐ No
   - C. Heat Exchangers? ☒ Yes ☐ No

4. Have all meters been calibrated within the past calendar year and are records of calibration maintained for the past five years? ☒ Yes ☐ No

5. Are all meters accessible and viewable? ☒ Yes ☐ No

6. Is there supervisory control and data recording system in place to monitor the liquids and gas in the facility? SCADA system ☒ Yes ☐ No

7. Is all gas and liquids entering and leaving the facility accounted for within a data recording system or logbook? SCADA system ☒ Yes ☐ No

Section 4: Location Operations — IDAPA 20.07.02.301

1. Is the facility site fenced? ☒ Yes ☐ No
   A. If yes;
      i. Was the fence installed within 60 days of completing facility construction? ☒ Yes ☐ No
      ii. Does the fence appear to:
         a. Maintain safe working conditions? ☒ Yes ☐ No
         b. Secure the facility site? ☒ Yes ☐ No
         c. Prevent access by wildlife and livestock? ☒ Yes ☐ No

2. Are chemicals stored and maintained in accordance with all applicable MSDS requirements? ☐ Yes ☒ No

3. Are all materials related to operations palletized? ☒ Yes ☐ No

4. Do all vehicles or materials on the site appear to be in use? ☒ Yes ☐ No

5. Is there less than 5% vegetation on site? ☒ Yes ☐ No

6. Is the site free from all trash, debris, or scrap metal on site? ☐ Yes ☒ No
   A. If no, is all trash, debris and scrap metal pending removal kept in a wind proof container and appear emptied regularly? ☐ N/A ☒ Yes ☐ No
   B. If trash or debris constitutes a fire hazard, is it removed to at least 100 feet from the facility, tanks or separators? ☐ N/A ☒ Yes ☐ No

Section 5: Accidents and Fires — IDAPA 20.07.02.302

1. Is the emergency response plan available for use or inspection? ☒ Yes ☐ No
   A. If yes, does the operation appear to be consistent with the response plan? ☒ Yes ☐ No

2. Is the location free of evidence of recent fires? ☒ Yes ☐ No
   A If no, have they been properly reported? ☒ N/A ☐ Yes ☐ No

3. Ask for a spill prevention and countermeasures plan. (SPCC can be located in company office). Are they aware of it? ☒ Yes ☐ No

SPS / SPCC on-site; emergency response plan at New Plymouth office only.

Section 6: Submitted Documentation — IDAPA 20.07.02.430

1. Has the operator submitted an as-built facility design plan that contains the minimum as required in rules? ☒ Yes ☐ No

2. Has a monthly report been submitted accounting for receipt, processing, and disposition of all gas by the gas processing facility within the reporting period per Idaho Code § 47-324 (1) (b)? ☐ N/A ☒ Yes ☐ No

   A. Was this report received by the 14th day following the end of the second month following the reporting period? ☐ N/A ☒ Yes ☐ No

Section 7: Tank Batteries — IDAPA 20.07.02.420

1. Are all tank batteries located at least 300 feet from any existing: (Note: constructed prior to 4/15/2015)
   - A. Occupied structures? ☒ Yes ☐ No
   - B. Water wells? ☒ Yes ☐ No
   - C. Canals? ☐ Yes ☒ No
   - D. Ditches? ☐ Yes ☒ No
   - E. Natural or ordinary high water mark of surface waters? ☐ Yes ☒ No

2. Is location at least 50 feet from highways when measured from outermost portion of the tank dike? ☒ Yes ☐ No

3. Are all tanks containing produced fluids or crude oil surrounded by tank dikes? ☒ Yes ☐ No

4. Are all tanks equipped to receive produced fluids surrounded by tank dikes? ☒ Yes ☐ No
   - A. If yes;
     - i. Do the dikes have a capacity of at least 1 ½ times the volume of the largest tank? ☒ Yes ☐ No
     - ii. Is all piping and manmade improvements that perforate the dike wall or tank battery floor sealed to a minimum radius of 12" from outside edge of the piping or improvement? ☒ Yes ☐ No
     - iii. Are valves and quick-connect couplers at least 18" from inside wall of tank dike? Outside with shut-off, spill control devices (see #5) ☒ Yes ☐ No
     - iv. Is vegetation on top and outside surface properly maintained? ☒ Yes ☐ No
     - v. Is a ladder or other permanent device installed over the tank dike to access the containment reservoir? See notes ☒ Yes ☐ No
     - vi. Is containment reservoir free of vegetation, storm water, produced fluids, other oil and gas field related debris, trash or flammable material? ☒ Yes ☐ No

5. Do drain lines have a valve installed, closed and capped off if not in use? ☒ Yes ☐ No

Section 8: Inspection Comments

Comments and Issues of Concern:

Need better spill containment device around pig launcher, not a metal barrel.
Leak with noticeable dripping at condensate fill valve – informed Mike of leak after inspection.
Portable spill containment berm ripped on one side (noted in 2021 inspection).
Some newly-delivered chemicals not moved within portable spill containment berm.
Gas detector emitted warning when multi-well separator unit door opened – informed Mike.

Weed abatement in some areas around equipment and within containment dikes becoming an issue. General facility clean-up and maintenance needed.

12 photos taken, uploaded to files.

Section 9: Attachments

List any and all attachments including photos, samples, documents, etc.

Condensate leak at valve within condensate spill control device, north side of containment dike.

Loading hose rail and hoses at leaking valve, view NE.

Palletized barrel containing fluids being used for spill prevention at pig launcher.

Chemicals outside of portable spill containment device, NW side of facility. Ripped containment device, center of photo.

Chemicals outside of portable spill containment device, NW perimeter of facility. View is SW/

NE perimeter of tank containment dike showing foot traffic in vicinity of access ladder. View SW.

Foot traffic causing deterioration of tank containment dike, NE side. View SE.