



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: Highway 30 Gas Processing Facility	Area Office: Boise / Director's office
Authorized Contact: Dan Johaneck (208) 800-9503 Tyler Hartung (208) 412-5475	Inspection Date: September 22, 2023, 10:15 AM
County: Payette	Report Date: September 25, 2023
Inspector's Signature: <i>James Thum</i> Date of Signature: September 25, 2023	Inspection Summary: <input type="checkbox"/> Operation appeared to be in compliance at the time of the inspection. <input checked="" type="checkbox"/> Issues of concern identified at the time of the inspection.

Location Description: 4201 US 30, New Plymouth ID 83655. West side of Highway 30, 3/4 mile north of I-84 Exit 9. Facility is no longer manned 24 hours. SROG has re-located the field office to a store front located at 112 N. Plymouth Ave, New Plymouth ID 83655.

Time of Inspection: 10:15 AM – 11:15 AM
 Weather: Partly cloudy, calm winds 0-5 MPH, 48-50°F
 Accompanied by D. Johnson, C. MacMahon, IDL SW Area Office, SROG staff

Section 2: Location of Plant IDAPA 20.07.02.430

- 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**)
 - Existing Occupied Structures? N/A Yes No
 - Water Wells? N/A Yes No
 - Canals and Ditches? N/A Yes No
 - Natural or Ordinary High Water Mark or Surface Waters? N/A Yes No
- 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
- 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

- Has the operator notified the department of which wells, by API number, are being served by the facility? Yes No
- Does the operator have a flaring permit from the IDEQ? **See Comments** Yes No
- Do the staff demonstrate knowledge of all operations and locations of:
 - Emergency shut off equipment? Yes No
 - Direction of Flow Lines? **Marked by arrows** Yes No

C. Heat Exchangers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4. Have all meters been calibrated within the past calendar year and are records of calibration maintained for the past five years? See Comments	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5. Are all meters accessible and viewable?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
6. Is there supervisory control and data recording system in place to monitor the liquids and gas in the facility? SCADA system	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
7. Is all gas and liquids entering and leaving the facility accounted for within a data recording system or logbook? SCADA system	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Section 4: Location Operations **IDAPA 20.07.02.301**

1. Is the facility site fenced? A. If yes;	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
i. Was the fence installed within 60 days of completing facility construction?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
ii. Does the fence appear to:	
a. Maintain safe working conditions?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
b. Secure the facility site? Note: site is no longer staffed, gate locked	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
c. Prevent access by wildlife and livestock?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2. Are chemicals stored and maintained in accordance with all applicable MSDS requirements? See Comments	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3. Are all materials related to operations palletized?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4. Do all vehicles or materials on the site appear to be in use?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5. Is there less than 5% vegetation on site? See Comments	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
6. Is the site free from all trash, debris, or scrap metal on site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
A. If no, is all trash, debris and scrap metal pending removal kept in a wind proof container and appear emptied regularly?	<input checked="" type="checkbox"/> N/A <input type="checkbox"/> Yes <input type="checkbox"/> No
B. If trash or debris constitutes a fire hazard, is it removed to at least 100 feet from the facility, tanks or separators?	<input checked="" type="checkbox"/> N/A <input type="checkbox"/> Yes <input type="checkbox"/> No

Section 5: Accidents and Fires **IDAPA 20.07.02.302**

1. Is the emergency response plan available for use or inspection? New Plymouth	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
A. If yes, does the operation appear to be consistent with the response plan?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2. Is the location free of evidence of recent fires?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
A. If no, have they been properly reported?	<input checked="" type="checkbox"/> N/A <input type="checkbox"/> Yes <input type="checkbox"/> No
3. Ask for a spill prevention and countermeasures plan. (SPCC can be located in company office). Are they aware of it? New Plymouth	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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? **2nd quarter 2016** 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? 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:**

Section 3, Item 2: SROG indicated that IDEQ permit was with Brammer Engineering or in Weiser-Brown offices in Magnolia ARK. IDL requested that a copy of the permit be kept onsite or in the New Plymouth office for inspection.

Section 3, Item 4: SROG staff indicated that onsite calibration tags are no longer updated. Staff now receives the data via email. IDL requested copies.

Section 4, Item 2: Portable spill containment device is breached (cut) on the east side approximately 14 inches along side and bottom (photos).

Section 4, Item 5: Weeds on site are generally <5% with the exception of the west side from the pig launcher/catchers south to the flare stack. Weed abatement needed in the vicinity of the storage tanks, in and outside of the containment berm.

Section 7, Item 4A vi: See weed abatement comments above.

TEAM Inc. inspected and tagged leaks at various locations in the facility 9/12/2023 and 9/13/2023. Seven of eight storage tanks were flagged with white GHG tags noted as "hatch cover" emissions detected; only one green fugitive emissions tag dated 3/12/2023 was with the storage tank flags.

Green fugitive emissions tags were also noted at the 4-inch pig launcher and condensate stabilizer units.

Plastic buckets with no secondary spill containment devices were being used at the condensate stabilizer. IDL recommended a secondary device or other back-up method needs implemented for potential spills.

Section 9: Attachments

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

15 photos taken, filed in Facilities folder on M drive.

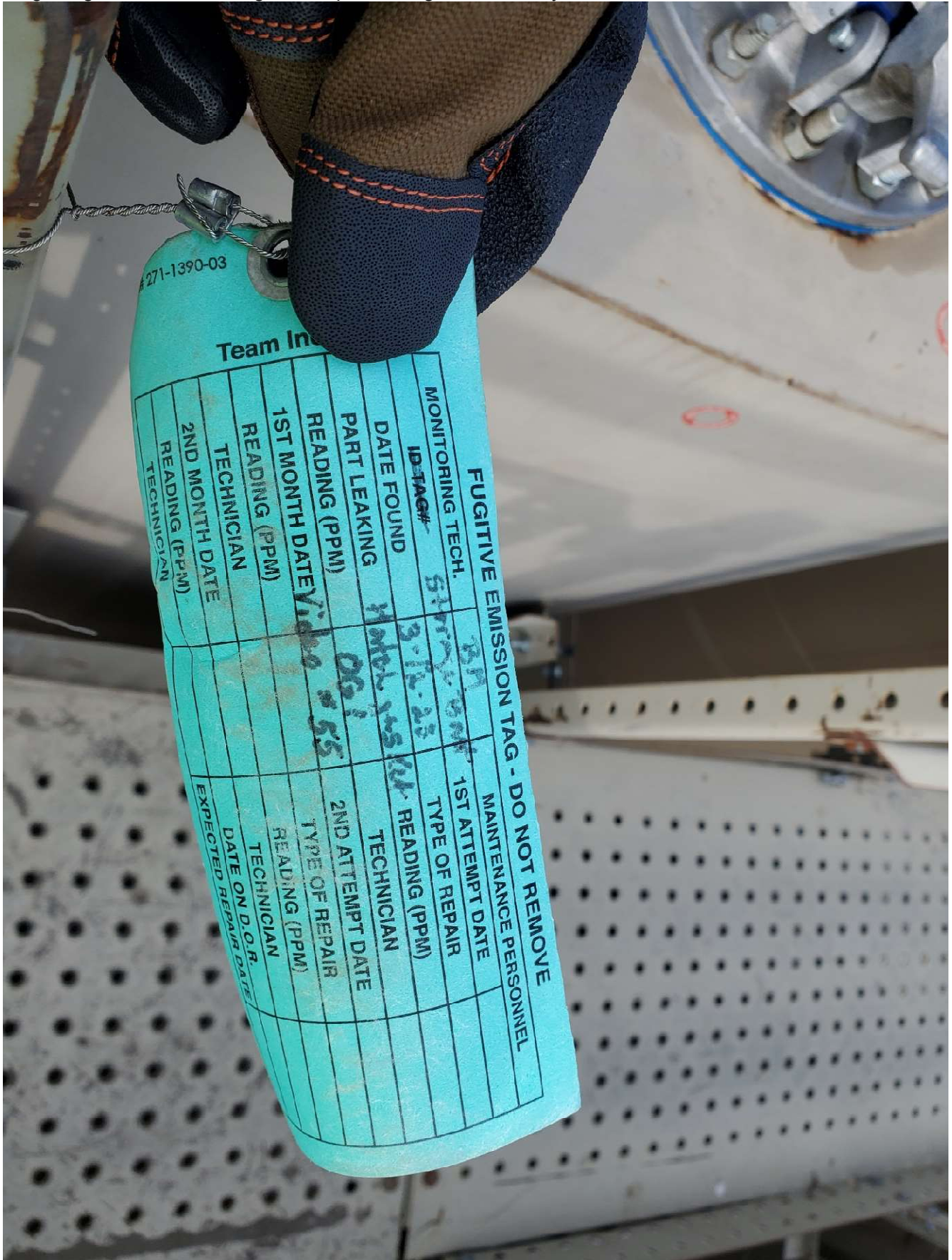
Top of condensate storage tanks, looking north. Seven of eight tanks were tagged with white GHG tags.



White GHG tag on top of storage tanks.



Single fugitive emissions tag from top of storage tank battery,



271-1390-03

Team In

FUGITIVE EMISSION TAG - DO NOT REMOVE		MAINTENANCE PERSONNEL	
MONITORING TECH.	BT	1ST ATTEMPT DATE	
ID TAG#	5177	TYPE OF REPAIR	
DATE FOUND	3-16-23	READING (PPM)	
PART LEAKING	Hatch Y25 R4	TECHNICIAN	
READING (PPM)	55	2ND ATTEMPT DATE	
1ST MONTH DATE		TYPE OF REPAIR	
READING (PPM)		READING (PPM)	
TECHNICIAN		TECHNICIAN	
2ND MONTH DATE		DATE ON D.O.R.	
READING (PPM)		EXPECTED REPAIR DATE	
TECHNICIAN			

Plastic five-gallon buckets for lubrication spill containment at condensate stabilizer unit.



Tear in portable spill containment device used for chemical storage south of pig launcher / catcher.

