

State of Colorado
Energy & Carbon Management Commission

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Document Number:
402325171

Date Received:
02/26/2020

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

1 of 1 CAs from the FIR responded to on this Form

1 CA Completed
0 Factual Review Request

OPERATOR INFORMATION

ECMC Operator Number: 96850
Name of Operator: TEP ROCKY MOUNTAIN LLC
Address: PO BOX 370
City: PARACHUTE State: CO Zip: 81635

Contact Name and Telephone:
Name: _____
Phone: () _____ Fax: () _____
Email: _____

Additional Operator Contact:

Contact Name	Phone	Email
<u>. Inspections</u>		<u>COGCCInspectionReports@terraep.com</u>
<u>Heil, John</u>		<u>john.heil@state.co.us</u>
<u>Schlagenhauf, Mark</u>		<u>mark.schlagenhauf@state.co.us</u>

ECMC INSPECTION SUMMARY:

FIR Document Number: 693200571
Inspection Date: 02/20/2020 FIR Submit Date: 02/25/2020 FIR Status: _____

Inspected Operator Information:

Company Name: TEP ROCKY MOUNTAIN LLC Company Number: 96850
Address: PO BOX 370
City: PARACHUTE State: CO Zip: 81635

LOCATION - Location ID: 324188

Location Name: Exxon Tank Farm Number: PA 313-33 County: _____
Qtrqr: NWS Sec: 33 Twp: 6S Range: 95W Meridian: 6
W
Latitude: 39.480346 Longitude: -108.011208

FACILITY - API Number: 05-045-00 Facility ID: 324188

Facility Name: Exxon Tank Farm Number: PA 313-33
Qtrqr: NWS Sec: 33 Twp: 6S Range: 95W Meridian: 6
W
Latitude: 39.480346 Longitude: -108.011208

CORRECTIVE ACTIONS:

1 CA# 136707
Corrective Action: _____ Date: 03/05/2020

Verify that tank patch work meets API 653, for repair of steel aboveground storage tanks used in the petroleum and chemical industries

If tank was pressured tested, Provide pressure test results,

Supply information Via FIRR and email to Western Integrity inspector

Response: CA COMPLETED

Date of Completion: 02/26/2020

Operator
Comment:

TEP respectfully disagrees with this corrective action for the following reasons:

- 1) There is no COGCC rule that prescribes an API standard for tank repairs (i.e., patching). The API Standard 653 referenced in the corrective action applies only to tank inspection, repair, alteration, or reconstruction of carbon and low alloy steel tanks that are built per API Standard 650 (i.e., for tanks that are specifically used for crude oil and condensate storage). The patch work observed in this inspection report were patches on a produced water tank, and as such, fall outside of the API Standard 653.
- 2) Although COGCC Rule 605.a.(1) requires that "... atmospheric tanks used for crude oil storage ..." shall be built (i.e., fabricated) in accordance with various Underwriter Laboratories (UL) and American Petroleum Institute (API) standards, there is no COGCC rule that prescribes a specific, independent standard for tank repairs.
- 3) For small, confined, pin-hole leaks on metal tanks that can easily be patched, TEP uses a 2-part epoxy material that is specifically formulated for repairing metal fuel tanks. The Safety Data Sheet (SDS) for this product is attached. TEP has had very good success with using this product for repairing / patching small leaks on metal tanks -- we have used this product for years, and to our knowledge, we have not had a single patch fail yet. This practice has been acceptable to COGCC in the past, and TEP believes there is no reason to abandon a practice that has proven to be successful and safely meets our needs. Further, there is no specific rule / standard that prohibits the use of this type of product for repairing small, confined, pin-hole leaks on metal tanks.
- 4) When feasible, a "cold repair" (i.e., using the epoxy material) is preferred over a hot repair (i.e., welding) simply due to the inherent safety risks associated with welding on tanks / vessels that are used in the oil and gas industry. There are numerous instances when a cold epoxy repair will successfully remedy a small leak. This practice helps to minimize worker exposure to the safety risks and hazards associated with performing hot work repairs on tanks, and will be used whenever it is practical to do so.

A second part of the corrective action requested: "If tank was pressure tested, provide pressure test results."
TEP Response: The tank was not pressure tested after making the repairs. However, after repairs (patching) were completed, the tank has since been placed back into service and has been closely re-inspected. There are no signs / evidence of continued leaking around the areas that were patched, and there are no other leaks apparent on the tank.

ECMC Decision: _____

ECMC
Representative: _____

OPERATOR COMMENT AND SUBMITTAL

Comment: An SDS for the epoxy material used to patch small holes on metal tanks is attached. As requested in FIR Document No. 693200571, this same information has been provided by email to Richard Murray, Western Integrity Inspector.

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct, and complete.

Print Name: Michael Gardner

Signed: _____

Title: TEP Environmental

Date: 2/26/2020 4:35:07 PM

ATTACHMENT LIST

View Attachments in Imaged Documents on ECMC website (<http://ecmcweblink.state.co.us/>) - Search by Document Number.

Document Number **Description**

402325171	FIR RESOLUTION SUBMITTED
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