Escambia Cou
Exxon

160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501

BOB GRAHAM
GOVERNOR

JACOB D. VARN
SECRETARY

ROBERT V. KRIEGEL
DISTRICT MANAGER

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHWEST DISTRICT

January 21, 1980 NW-738

Mr. C. A. Woolley
Operations Manager
Exxon Company, U. S. A.
Post Office Box 60626
New Orleans, LA 70160

Dear Mr. Woolley:

In response to your letter of January 11, 1980, the Department has no objection to your contingency plan for emergency storage of sulfur at the Wiggins Lake site. You should notify us prior to implementation, and, of course, provide immediate notification in case of any overflows or spills.

Sincerely,

Robert V. Kriegel
District Manager

RVK/tmg

738

EXXON COMPANY, U.S.A.
POST OFFICE BOX 60626 · NEW ORLEANS, LOUISIANA 70160

PRODUCTION DEPARTMENT
SOUTHEASTERN DIVISION

C. A. WOOLLEY
OPERATIONS MANAGER

RECEIVED
JAN 14 1980
NORTHWEST FLORIDA
DER

January 11, 1980

Re: Approval Request for Sulfur
Storage Contingency Plan

Mr. Robert V. Kriegel
Department of Environmental Regulation
160 Governmental Center
Pensacola, Florida 32501

Dear Mr. Kriegel:

This letter confirms a discussion between David Motes of our office and your Mr. Jack Preece on October 19, 1979. We are requesting approval of the following sulfur storage contingency plan that was considered during an emergency a month ago.

Exxon Company, U.S.A. operates oil and gas treating facilities in the Jay Field (St. Regis, Jay 5, Santa Rosa, South Jay, and Wiggins Lake) and Blackjack Creek Field in Northwest Florida, and Flomaton, Fanny Church, and Big Escambia Creek Fields in South Alabama. These operations produce approximately 120,000 barrels of oil and condensate per day. Since the produced reservoir fluids are sour, it is necessary to treat the crude oil and gas in these treating facilities to remove the H_2S. The recovered H_2S is converted to elemental sulfur in Claus plants at these facilities. Normal operations generate approximately 1700 long tons of sulfur per day with a maximum of 2000. This sulfur is normally trucked to Freeport Sulfur's facility in Pensacola where it is stored prior to shipment to Louisiana by barge. If the 11,000 LT of sulfur storage capacity at the Exxon plants is exhausted, then the plants must be temporarily shut down. An unscheduled shutdown not only halts production but reduces ultimate field recovery since some wells will not flow again if production is interrupted for more than one or two days.

During the week of September 10, 1979, due to some problems with barges getting into Pensacola after Hurricane Frederic, we developed a contingency plan to truck molten sulfur from all of the treating facilities to the Wiggins Lake Treating Facility as shown on the attached Jay area map, rather than to the port in Pensacola. The molten sulfur would be gravity fed from the trucks into a 100' x 100' x 6' earthen pit with a 3000 LTS storage capacity fully enclosed by a dike a minimum of 3' above grade on our plant site. A diagram of this pit and the specific location is attached. The sulfur would be allowed to solidify in the open air in layers a maximum of 6" deep. The solid sulfur would be scraped up in front-end loaders and melted again for sale through normal channels at a convenient time. Mr. Gary Dowling of our office notified Mr. Tom Moody of our plan and also the Department of Natural Resources. We were able, however, to ship our sulfur before it was necessary to implement this plan.

Atmospheric solidification is routinely used by other companies for sulfur storage in Alabama, Mississippi, Louisiana, Texas, and Canada. We believe that use of this storage method as an emergency procedure will produce minimal adverse environmental effects. The dike will prevent any storm water runoff. Rainwater leaching will be minuscule because sulfur freezes at 245°F thus sealing the surface and because use of this pit will be limited to emergencies only. Safety requirements for such operations are well established.

It should be emphasized again that this plan will be limited to emergencies only, and your office will be notified prior to implementation. Your written approval of this plan is requested now so that we may complete contingency plans. The Department of Natural Resources, which has given tentative verbal approval, is also being contacted in a similar letter for their approval. If there are any questions, please contact G. R. Dowling at 477-8240.

Sincerely,

Exxon Corporation

By _____
Operations Manager
Southeastern Division
Exxon Company, U.S.A.
(a division of Exxon Corporation)

DRM:ew
Attachments

TO PLANT OFFICE
N
DIRT ROAD
WIGGINS LAKE PROCESS AREA 400 YDS.
PAVED ROAD
UNDERGROUND
TRUCK UNLOADING AREA
LLEE 37-2 McDAVID LDS. (DEAD WELL)
37-2 FLOWLINE
℄ EXIST. FENCE
50'
TO FLARE AREA & EMERGENCY PIT
A
A
EMERGENCY SULFUR PIT
5'
100'
100'
EXXON PIPELINE TERMINAL
WELL FLOWLINES (UNDERGROUND)
WOODS
WOODS
PLAN VIEW
NO SCALE
3'
3'
6'
12'±
SECTION 'A-A'
SCALE 1/8" = 1'-0"
WIGGINS LAKE FACILITIES
EMERGENCY SULFUR PIT
ESCAMBIA CO., FLA.
EXXON COMPANY, U.S.A. (a division of Exxon Corporation)
PRODUCTION DEPARTMENT
PENSACOLA DISTRICT
DRAWN Hitchcock
CHECKED
ENGR. SECTION GAS-2
APPROVED
REVISED
DATE 11-21-79
SCALE SHOWN
JOB NO.
FILE NO. PDB-245