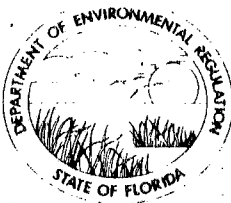


160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501



*Escambia Co
Exxon*

BOB GRAHAM
GOVERNOR

JACOB D. VARN
SECRETARY

ROBERT V. KRIEDEL
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 60826 • NEW ORLEANS, LOUISIANA 70160

PRODUCTION DEPARTMENT
SOUTHEASTERN DIVISION

C. A. WOOLLEY
OPERATIONS MANAGER

RECEIVED

JAN 14 1980

NORTHWEST FLORIDA
DEB

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.

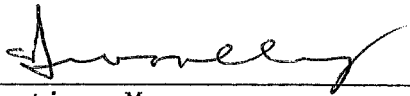
Mr. Robert V. Kriegel
Department of Environmental Regulation
Page 2

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.

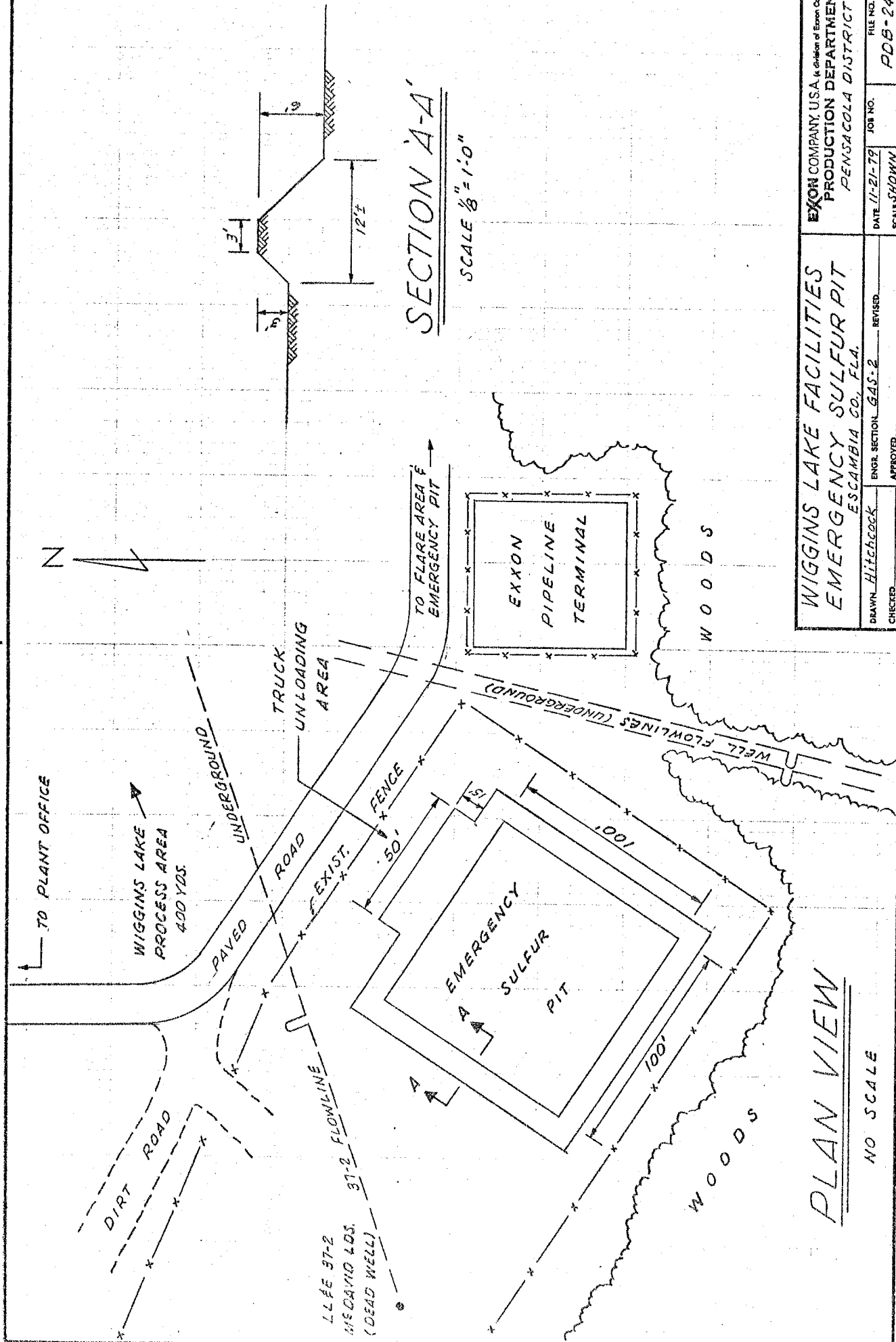
It should be emphasized again that this plan will be limited to emergencies only, and your office will be notified prior to implementation. Your written approval of this plan is requested now so that we may complete contingency plans. The Department of Natural Resources, which has given tentative verbal 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



EXXON COMPANY USA is a Division of Exxon Corporation PRODUCTION DEPARTMENT PENSACOLA DISTRICT		FILE NO. PDB-245
DATE 11-21-79 SCALE SHOWN	JOB NO.	REVISIONS ENGR. SECTION GAS-2 CHECKED APPROVED

WIGGINS LAKE FACILITIES
EMERGENCY SULFUR PIT
 ESCAMBIA CO., FLA.

DRAWN *Hitchcock*
 CHECKED

Memo Regarding Emissions from Sulfur Pits and Flares

Barry Andrews

From: nina.j.forehand@exxonmobil.com
Sent: Tuesday, November 18, 2003 7:16 AM
To: bandrews@rtpenv.com
Subject: Jay Data

Importance: High

Nina Forehand
Senior Staff Environmental Engineer
ExxonMobil Production U.S. East
504-561-4829 phone 504-561-4222 fax

----- Forwarded by Nina J Forehand/NewOrleans/Mobil-Notes on 11/18/03 07:15 AM -----

Chris D Garsed

To: Nina J Forehand/NewOrleans/Mobil-Notes@xom
cc:

11/17/03 02:41 PM Subject: Jay Data

Nina,

I estimate sulfur emissions from the Jay sulfur pits to be 67.5 lbs/day H₂S and 32.6 lbs/day SO₂ (total for both pits). This is calculated from the concentration difference between the pit inlet and outlet. The inlet concentration is calculated from H₂S and SO₂ solubility in sulfur as a function of partial pressure. The outlet concentration is from the analysis results of several samples taken at truck loading. The total sulfur throughput is well known. I have the calculation if you need it.

I estimate the pilot gas to both flares at Jay to be approximately 20 kscfd. There is a total relief system purge of approximately 10 kscfd. Total flare pilots and relief purge, approximately 30 kscfd of fuel gas. These are purely educated estimates. I believe they are reasonably correct.

Regards,
Chris D. Garsed, PE
Senior Staff Production Support Engineer
ExxonMobil US Production - Jay / BEC / Mobile Bay
251-873-2104 @ Mobile Bay / 888-968-2649 Pager