



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

April 27, 2012

CERTIFIED MAIL – RETURN RECEIPT REQUESTED: 7010 2780 0002 4356 5020

Mr. Peter C. Stynes  
Refinery Manager  
Ponca City Refinery  
P. O. Box 1267, 2306RB  
Ponca City, OK 74602-1267

Re: Acid Gas Flaring Incident Ending August 12, 2011  
ConocoPhillips Company – Ponca City Refinery  
Ponca City, Oklahoma

Dear Mr. Stynes:

The Environmental Protection Agency (EPA) received a report dated September 26, 2011, regarding the August 12, 2011, acid gas flaring incident at the ConocoPhillips Company (CP) refinery located in Ponca City, Oklahoma. The root cause determined for this incident was entrained water in a tower re-boiler, resulting in the carryover of organics into the Jupiter Sulfur Recovery Unit (SRU), reducing acid gas flow to the SRU and causing the acid gas pressure in the Refinery amine generators to increase until the pressure control valve opened.

CP stated that the measures identified below will be taken to reduce reoccurrence of the events. EPA acknowledges the following measures as corrective action items:

- CP will install piping to allow the Coker Gas Plant (CGP) absorber/stripper re-boilers to blowdown prior to startup to eliminate the possibility of being “waterlogged.”
- CP will Repair the CGP amine contactor feed filter dump valves to facilitate liquid hydrocarbon removal.
- CP will install low temperature difference alarms on the absorber/stripper re-boilers to provide warning if it is not operating properly.
- CP will install high pressure difference alarms on the absorber/stripper to provide warning if the tower is flooding.

EPA determines that the shutdown of the SRU and resulting acid gas flaring incident when the pressure control valve on the Refinery amine generators opened was a failure of equipment that is due to a failure by CP to operate and maintain equipment in a manner consistent with good engineering practice in accordance with Paragraph 189(b).

Re: ConocoPhillips Company – Ponca City Refinery  
Flaring Incident

In accordance with Paragraph 199 of the Consent Decree, EPA assesses a penalty of twenty-seven thousand five hundred dollars (\$27,500) [16.7 tons X \$2,300/ton = \$38,410 > \$27,500/day limit]. EPA records indicate that this is the first AG Flaring Incident at the Ponca City Refinery for the respective twelve-month rolling period. In accordance with Paragraph 255 of the Consent Decree, CP shall pay half (\$13,750) to the State of Oklahoma and half (\$13,750) to the EPA, Region 6.

To expedite the processing of the payment of stipulated penalties, please clearly identify the incident date and amount of the penalty both on the check, if paying by check, and in the letter accompanying payment by check or wire transfer. If CP wishes to pay stipulated penalties for multiple incidents with one check or wire transfer, please identify each separate incident date and the penalty amount within the letter. Please also send a copy of the letter accompanying the payment to [braby.sharon@epa.gov](mailto:braby.sharon@epa.gov).

If you have any questions regarding this matter, please contact Mr. Charles Handrich at (214) 665-6553.

Sincerely,

  
John Blakes  
Director  
Compliance Assurance and  
Enforcement Division

cc: Cully Farhar, Program Manager  
ConocoPhillips Company  
600 North Dairy Ashford  
Room TA3134  
Houston, TX 77079

Thomas J. Myers, HSE Manager, U.S. Refining  
ConocoPhillips Company  
600 North Dairy Ashford  
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Managing Environmental Counsel  
Legal Department  
ConocoPhillips Company  
600 North Dairy Ashford  
Houston, TX 77079

Re: ConocoPhillips Company – Ponca City Refinery  
Flaring Incident

Bruce Gelber, Chief  
Environmental Enforcement Section  
Environment and Natural Resources Division  
U.S. Department of Justice  
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Washington, DC 20044-7611

Phillip Brooks, Director  
Air Enforcement Division (2242A)  
Office of Civil Enforcement  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
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Mr. Eddie Terrill, Division Director  
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Oklahoma Department of Environmental Quality  
P. O. Box 1677  
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Via electronic mail:  
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