

APPENDIX L – DOCUMENTATION OF FACILITY DESIGN COMPLIANCE

Documentation that the facility and/or disposal well(s) will comply with design criteria of Section 509; e.g. limited access, storage tank containment, offloading area spill containment, etc. (Section 519.C.12)

Documentation that the facility and/or disposal well(s) will comply with design criteria of Section 509; e.g. limited access, storage tank containment, offloading area spill containment, etc. is as follows:

- A. The Brickyard Trucking, LLC (Brickyard) Class II Commercial Saltwater Disposal Well Facility (The Facility) and its disposal wells are designed and constructed in accordance with LAC 43:XIX.509 in such a manner as to prevent the movement of E&P Waste into soil, groundwater aquifers or underground sources of drinking water (USDWs) and to prevent the discharge of E&P Waste materials or E&P Waste byproducts into man-made or natural drainage or directly into state waters, as shown by the attached Detailed Well Schematic Diagrams for each of the three (3) proposed Class II Commercial Saltwater Disposal Wells and the Detailed Facility Diagram Attachment No. 3). The design of this facility and wells also provides for protection of public health, safety, and welfare of the environment and follows the guidance provided in ENV-GS-07 for concrete container construction and operation. There is a concrete sump (17.09 barrels) depicted on the Northeast end of the Facility Diagram within the concrete wall of the facility. ENV-GS-07 references a “sump”.
- B. As required by LAC 43: XIX. Chapter 5, §509, The Facility is designed and constructed in a manner which is protective of public health, safety and welfare of the environment, surface waters, groundwater aquifers and underground sources of drinking water in accordance with, but not limited to, the following requirements:
1. All applicable construction and operational standards of this Chapter, as well as Chapter 2, Chapter 3, and Chapter 4 of LAC 43: XIX, Subpart 1, Statewide Order No. 29-B;
 2. The Facility design provides for the segregation, separation, and containment of free oil, where appropriate;
 3. Retaining walls (levees) will be built at The Facility around all above-ground storage tanks in the form of a 4-ft. high sealed seamless concrete containment wall integrated with a sealed seamless concrete floor, built to contain the largest tank system within the 4-ft high sealed seamless concrete wall and to meet or exceed the onsite requirements of the Spill Prevention, Control and Countermeasure Plan and prevent the release of stored E&P Wastes due to tank leakage, or some other cause. The spill containment capacity of the containment is approximately 15,271 barrels **(13,700 barrels is 100% tanks and sump capacity within containment)**. The total volume of the tanks and sump within the containment is 13,700 barrels.

4. Spill containment systems at The Facility will be built around unloading areas in the form of 6-in. roll over sealed seamless concrete berms on two (2) sides and 6-in sealed seamless concrete curbs on the sides of the offloading pad to prevent the escape of any E&P Wastes spilled during off-loading or hydrocarbons during off-loading; The unloading area is slightly sloped towards a sealed seamless concrete integrated sump, equipped with a float actuated sump that will automatically collect any fluids from the unloading pad and transfer them to the lined steel gun barrels or lined steel desanding tanks within the tank containment to go through the process flow and ultimately be disposed in the permitted SWD well.

E&P WASTE UNLOADING AREA:

When a transporter arrives on-site to deliver a load of E&P Waste fluid, a trained Brickyard Employee will log the truck in and acquire proper documentation to determine that the acceptance of all such material is in accordance with LAC 43: XIX.545.A-G. The trained employee will be present during the loading process to monitor, assist and assure the unloading is conducted according to policy to prevent spills. Drivers are required to comply with warning signs and to remain on the unloading site while off-loading operations are underway. Drivers are also required to inspect tank drains and outlets before and after loading operations and to notify facility personnel of any potential problems. Spill containment systems at The Facility will be built around unloading areas in the form of 6-in. roll over sealed seamless concrete berms on two (2) sides and 6-in sealed seamless concrete curbs on the sides of the offloading pad to prevent the escape of any E&P Wastes spilled during off-loading or hydrocarbons during off-loading. Any spilled fluids travel downslope towards a sealed seamless integrated concrete sump, equipped with a float actuated sump pump to prevent the offsite release or accumulation of any fluids on the unloading pad in compliance with LAC 43: XIX.509. B.4. The driver will connect a four-inch (4-in.) connection with to the tail end of the tank truck, and the valve opened to allow the contents to be pumped directly into the gun barrel(s). Absorbent pads will be in place to absorb any minor amounts of E&P Waste fluid that may be spilled. The unloading process will be monitored for any problems, and if such a problem occurs onsite personnel will immediately cease unloading operations, until such problem is resolved.

OIL UNLOADING AREA:

The Oil Load-out & Containment is located on the sealed seamless concrete unloading pad with sealed seamless 6-in concrete roll-over berms as seen on the attached Facility Diagram. Once the oil is deemed in condition to be sold, an approved transporter will be notified to pick up the oil. When the transporter arrives on-site, he will be directed to the oil loadout unloading area by a trained Brickyard Employee, who will log the truck in and acquire proper documentations to determine that the disposition of the oil is in accordance with the required regulations. The trained employee will be present during the loading process to monitor, assist and assure the loading is conducted according to policy to prevent spills. A sample of the oil will be collected, and the water percentage will be determined. If the oil is deemed acceptable, the driver will gauge the tank to determine the volume of oil in the tank. The driver will then connect the suction hose to the loading valve in the polypropylene containment. The loading valve will be opened, the tank valve will be opened and the valve at the truck will be opened with the vacuum pump running. The driver will monitor the truck compartment with the site gauge and the tank the driver is pulling from with the gauge line. Once the tanker is near capacity the driver will slow the vacuum pump down and reducing the vacuum being pulled to move oil. The tank valve will be closed

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then the loading valve in the polyethylene container will be closed. The valve at the truck will be closed and disconnected. A five-gallon bucket will be placed beneath the hose and truck connection. The hose will then be disconnected at the loading valve in the polypropylene containment. Any spilled product in the five-gallon bucket or the polypropylene containment at the loading valve will be returned to the oil storage tank. Absorbent pads will be in place to absorb any minor amounts of oil that may be spilled. Back up spill containment will be provided by the slightly sloping unloading pad that prevents the accumulation of any fluids on the unloading pad by directing any spilled fluids towards a sealed seamless integrated concrete sump, equipped with a float actuated sump pump that transfers fluids to the gun barrel(s) to go through the treatment process.

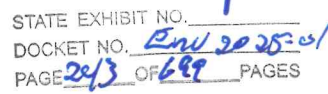
5. The proposed injection wells will be designed and permitted in accordance with the provisions of the regulations of the rules of the Office of Conservation and reviewed by the Injection and Mining Division for proper compliance before being authorized for construction. Once the wells are constructed, another review will take place by the Office of Conservation, Injection and Mining Division to assure that the wells have been constructed as authorized and have passed the testing requirements to assure that the wells are safe for injection, prior to an authorization to inject being issued. The USDW will be protected in each well by two (2) separately cemented casing strings to isolate the USDW from the injection zone and additionally by a 3rd steel tubing string with a packer that isolates the injection zone below confining shales and is tested for integrity or the possibility of leakage by annular and injection pressure gauges.
 6. Limited access to E&P Waste transported on land will be provided by a lockable gate system around The Facility. A 6-foot chain-link fence around the entire facility will be installed and the gates shall remain locked except during the hours that the facility is manned and operating to receive E&P Waste.
- C. The Facility has no land treatment cells and therefore the maximum five acres size requirement is not applicable.
- D. No earthen or artificially lined pits will be constructed or used for storage of E&P Waste at The Facility.

STATE EXHIBIT NO. 1
DOCKET NO. Env 2025-01
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Raines & Associates, LLC

**ATTACHMENT 3
FACILITY DIAGRAM**

LOCATION

SCALE

AS SHOWN

DRAWN BY

JKW

REVISED DATE

02/11/25

BRICKYARD TRUCKING, LLC. (B1119)
PROPOSED COMMERCIAL SMD FACILITY
SECTION 17 T16N R8W
JAMESTOWN FIELD
BIENVILLE PARISH, LOUISIANA

REVISION 1