



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

30-045-29383

Lori Wrotenbery
Director
Oil Conservation Division

Certified Receipt #7000 0520 0018 0518 0094

August 10, 2001

Diana Luck, Northwest Area Manager
PNMGS
POB 4750
Farmington, NM 87499

Re: Continuing Complaints from Operation of a Mercaptan Odorant Drop

Dear Ms. Luck:

PNM Gas Services operates a mercaptan odorant drop on the Richardson Operating Company, ROPCO #15-2 well location at 476' FSL, 1800' FEL Section 15-T29N-R13W within the city limits of Farmington, New Mexico. This odorant drop is part of the Farmington combined natural gas gathering and distribution system operated by PNMGS.

The well location is approximately 200 feet east of eight apartments owned by Habitat for Humanity in the 900 block of McCormick School Road. The apartment residents and other neighbors have complained of periodic pervasive odors from your system for at least three years. We have responded to four complaints concerning this location. The Farmington Fire Department has responded several times to odor complaints involving the site. One of the incidents resulted in the evacuation of a Head Start School located approximately 600' east of the well location at 900 South Carlton Avenue and the reported hospitalization of one of the teachers. Interviewing complainants has revealed a "pervasive odor that smells like natural gas". We believe the source of this odor to be the PNMGS odorant drop at the ROPCO #15-2. Each incident seems to correspond with recharging the odorant reservoir or a down period for Richardson's on site compressor. This problem appears to affect the breathing of some people exposed to the odorant. Some individuals have sought medical attention for the nausea created by the strong odor.

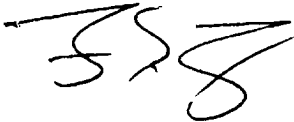
PNMGS has always responded to our calls to inspect the site. Until our telephone conversation on 08/08/01 I had not been aware that PNMGS has made efforts to improve equipment and alter operations of the odorant drop. I understand PNMGS has gone to a wick type supply system in an attempt to limit odor. Unfortunately odor continues as an irritating nuisance to residents and a tough response for Farmington Fire Fighters.

As you know, this odorant is added as a safety measure to draw a person's attention to a hazard. Besides the general nuisance created by the periodic leaks in your odorant system, there is a very real possibility that these leaks could mask a dangerous situation and cause a tragic loss of life. These leaks are also causing a burden on our agency and the local safety agencies to respond to calls from people who are either made ill by the smell or are genuinely afraid of fires or explosions from leaking gas.

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Please apply whatever technological or logistical means are available to solve this serious and potentially dangerous problem.

Sincerely,

A handwritten signature in black ink, appearing to be 'FTC' followed by a stylized flourish.

Frank T. Chavez
District Supervisor
ftchavez@state.nm.us

FTC/mk

CC: DGF File
Well File
Roger Anderson-OCD, Santa Fe
David Brooks-OCD, Santa Fe
Herb Veazey-Farmington Fire Marshall