

State of New Mexico
Energy, Minerals and Natural Resources Department

Michelle Lujan-Grisham
Governor

Erin Taylor
Acting Cabinet Secretary

Ben Shelton
Deputy Secretary

Albert C.S. Chang
Division Director
Oil Conservation Division



BY ELECTRONIC MAIL ONLY

July 2, 2026

Denise Sheffield
Northwind Midstream Partners, LLC
811 Louisiana St, Suite 2500
Houston, TX 77002
DSSheffield@Marathonpetroleum.com

RE: Northwind Midstream Partners, LLC- Notice of an Administratively Complete Hydrogen Sulfide Contingency Plan, Titan Gas Gathering Plant, Lea County, New Mexico

Dear Ms. Sheffield:

The New Mexico Energy, Minerals and Natural Resource Department's Oil Conservation Division (OCD) has reviewed the revised Hydrogen Sulfide (H₂S) Contingency Plan submitted to the OCD on June 26, 2026, by Northwind Midstream Partners, LLC (Northwind), OGRID 331501, for the Titan Gas Gathering Plant (Facility ID fAPP2404426632), Lea County, New Mexico. The submitted H₂S Contingency Plan includes all content components as required by 19.15.11 NMAC; therefore, the OCD has determined that the submitted H₂S Contingency Plan is administratively complete.

Please be advised that OCD's acceptance of this plan does not relieve Northwind of responsibility should its operations fail to adequately detect, investigate, and/or undertake corrective actions to prevent or stop a hydrogen sulfide release. In addition, OCD's acceptance does not relieve Northwind of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions regarding this letter, please do not hesitate to contact me at (505) 709-5149 or via email.

Respectfully,

Joel Stone
Senior Environmental Scientist
joel.stone@emnrd.nm.gov



Emergency Action Plan

(Includes Hydrogen Sulfide Contingency Plan)

Titan Gas Gathering Plant

108 Beckham Road

Jal, NM 88252

32.0241 N, 103.2786 W

ORIGINAL (2026 March)

PLAN APPROVAL STATEMENT

MPLX TITAN GAS GATHERING PLANT EMERGENCY ACTION PLAN

This Emergency Action Plan is intended for responding to incidents occurring at the Titan Gas Gathering Plant. It is designed to comply with the following requirements: 29 CFR 1910.120 "Hazardous Waste Operations and Emergency Response", 29 CFR 1910.39 "Fire Prevention Plan" and 29 CFR 1910.38 "Emergency Action Plan".

It will be the responsibility of the site supervisor, in conjunction with the Emergency Preparedness Group Representative and site safety, to review and maintain this plan at least annually. All personnel affected by this plan will be trained of its content and are encouraged to participate in its annual review.

I certify, to the best of my knowledge and belief, under penalty of perjury under the laws of the State of New Mexico, that the information contained in this Emergency Action Plan is true and correct and that the plan is both feasible and executable.



Kevin Smith
Operations Director
MPLX

6/25/2026

Date

Titan Gas Treatment Plant Emergency Action Plan**Preface****DISTRIBUTION LIST**

[API RP-55 7.3]

This Plan shall be available to all personnel responsible for implementation, regardless of their normal location assignment. A copy of the Plan will be maintained at the Titan Facility Control Room, in the Plant Manager's office at the plant, and on the Corporate internal SharePoint.

Name	Position	Binder number
Kevin Smith	Operations Director	1
Michael Payne	Plant Manager	2
	Titan Plant Control Room	3, 4
	Titan Emergency Trailer	5
Robert Kestenbaum	EPG Representative	6
John Ford	Emergency Management	7
Lo Walp	Safety	8
Lori-Ann Malcolm	PSM	9
Benoit LaMarche	Environmental	10
Jal Fire Department		11
Jal Police		12
Jal City Manager		13
Hobbs Fire Department		14
Hobbs Police		15
Lea County 911 Center		16
Lea County LEPC		17
Lea County Sheriff's Department		18
New Mexico OCD – Hobbs	1625 N. French Drive Hobbs, NM 88240	19
New Mexico OCD – Santa Fe	1220 S. St. Francis Drive Santa Fe, NM 87505	20
New Mexico State Police	5100 Jack Gomez Blvd Hobbs, NM 88240	21

RECORD OF CHANGES

This plan will be reviewed at least annually, or whenever major changes should trigger a redistribution of the EAP. These changes will be noted in this form.

Revision #	Date	Description	Name
Original	3/2026	Original– standard version	R. Kestenbaum
Revision 1	6/2026	Response to OCD letter: Updated ROE evacuation map, process for determining when safe to enter	R. Kestenbaum, D. Barton

Titan Gas Treatment Plant Emergency Action Plan

Preface

Contents

PLAN APPROVAL STATEMENT	i
DISTRIBUTION LIST	ii
RECORD OF CHANGES	ii
SECTION 1 INTRODUCTION	1
1.1 Owner Name and Address	1
1.1.1 Plan Correspondence	1
1.1.2 Terminal Address and Phone Number	1
1.1.3 Driving Directions to Plant	1
1.2 Plan Purpose and Objectives	1
1.3 Scope of Plan	2
1.3.1 H2S Contingency Scope	2
1.4 Plan Review and Update Procedures	3
1.4.1 Immediate Plan Updates	3
1.4.2 Submission of H2S Contingency Plans	3
1.4.3 Annual Inventory of Contingency Plans	3
1.5 Facility Description, Maps and Drawings	4
1.5.1 Facility and Process Description	4
1.5.2 Maps and Figures	6
SECTION 2 IMMEDIATE ACTION PLAN/INITIAL RESPONSE GUIDE	1
2.1 Immediate Action Plan	1
2.1.1 Activation Levels	1
2.1.2 Events That May Lead to a Release of H2S	1
2.2 Level 1 Activation	2
2.3 Level 2 Activation	3
2.4 Level 3 Activation	5
2.4 Initial Response Guide	6
SECTION 3 NOTIFICATION	1
3.1 Initial Notification	1
3.2 NOTIFICATION REQUIREMENTS	1
3.3 DATA REPORTING	1
3.4 H2S Emergency Communication	6
3.5 Other External Notifications	7
3.5.1 Media Communication	7
3.5.2 Next of Kin Notification	7
3.6 Coordination with State Emergency Plans	7
3.6.1 Notifications and Reports	8
SECTION 4 SPECIFIC RESPONSE ACTIONS	1
4.1 Chemical Information	1
4.2 Initial Actions	1
4.2.1 General Procedures	1
4.2.2 What to do upon discovering an emergency	2
4.3 Responsibility and Duties of Personnel During an Emergency	2
4.3.1 Site Security	3
4.3.2 Discovery and Internal Reporting	3

REVISION 1**June 2026****iii**

Titan Gas Treatment Plant Emergency Action Plan

Preface

4.4 Location of Nearby Residences, Medical Facilities, Roads, Businesses, Public Receptors, and Producers 4

 4.4.1 Residencies and Medical Facilities 4

 4.4.2 Roads 4

 4.4.3 Businesses or Other Public Receptors 4

 4.4.4 Producers 4

4.5 Evacuation Procedures 4

4.6 Fire or Explosion 8

 4.6.1 Initial Actions 8

4.7 Response Equipment 8

 4.7.1 Emergency Trailers 8

 4.7.2 Gas Detection Equipment 8

 4.7.3 Respirators 9

 4.7.4 Process Purge System 9

 4.7.5 Fire Fighting Equipment 9

4.8 Medical Incident 10

 4.8.1 Injury or Medical Emergencies Requiring Paramedic Assistance 10

 4.8.2 First Aid Equipment 10

 4.8.2 Nearest Hospitals 10

4.9 Hazardous Materials Incident (Non-H2S Incident) 10

 4.9.1 Checklist of Spill Response Actions 10

 4.9.2 Initial Response: Hazardous Materials Release 10

 4.9.3 Uncontrollable Release 10

4.10 Characteristics of Hydrogen Sulfide, Sulfur Dioxide, Carbon Dioxide 11

 4.10.1 Hydrogen Sulfide (H2S) 11

 4.10.2 Sulfur Dioxide (SO2) 12

 4.10.3 Carbon Dioxide (CO2) 13

4.11 H2S Radii of Exposure 13

 4.11.1 Worst Case Scenarios 13

4.12 Severe Weather 14

 4.12.1 Downed Power Lines 14

 4.12.2 Lightning Storms 14

 4.12.3 Tornadoes or Storms with High Winds 14

 4.12.4 Earthquake 14

4.13 Security 15

 4.13.1 Security Incident Response Guide 15

 4.13.1 Site Security 16

4.14 Other Incidents 16

 4.14.1 Floods 16

 4.14.2 Rescue 16

SECTION 5 FORMS 1

SECTION 6 TRAINING & EXERCISES 1

 6.1 General Emergency Action Plan Training 1

 6.2 H2S Training 1

 6.2.1 Training of Essential Personnel 1

 6.2.2 Notification and Training of Producers Located within the ROE 2

 6.2.3 Training of Public Officials and Emergency Response Agencies 2

 6.3 Emergency Action Plan Exercises 2

Titan Gas Treatment Plant Emergency Action Plan

Preface

6.3.1	Frequency	2
6.3.2	Exercise Design.....	2
6.3.3	Evacuation Drill	2
6.4	H2S Emergency Response Drills	2
6.5	H2S Emergency Response Training and Attendance Documentation.....	3
6.6	Post Incident Actions	3
6.6.1	Lessons Learned	3
6.6.2	Incident Investigation.....	3
6.7	Coordination Activities	3
APPENDIX A CROSS REFERENCE.....		1
A.1	OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (29 CFR)	1
A.2	NMOCD H2S Contingency Plan.....	2

THIS PAGE INTENTIONALLY LEFT BLANK

SECTION 1 INTRODUCTION

1.1 Owner Name and Address

MPLX
200 East Hardin
Findlay, OH 45840

1.1.1 Plan Correspondence

All plan correspondence should be sent to:

Robert Kestenbaum Emergency Management Coordinator 1300 Pier B St Long Beach, CA 90813	John Ford Emergency Management 1515 Arapahoe St, Twr 1, Ste 1600 Denver, CO 80202
---	--

1.1.2 Terminal Address and Phone Number

Titan Gas Treatment Plant
108 Beckham Road
Jal, NM 88252
32.0273 N, 103.2770 W
432-216-5917

1.1.3 Driving Directions to Plant

From Jal, NM (intersection of 3rd Street and W. Kansas Avenue), drive south on 3rd Street for 1.3 miles. Continue south on Frying Pan Rd for 6.8 miles. After, turn right onto Beckham Rd, continuing for 1.4 miles before turning right. After 0.8 miles, make another right. Last, turn right and follow the road for 0.3 miles before approaching the entrance to the treating facility on the left.

1.2 Plan Purpose and Objectives

The Company is committed to preventing incidents, mitigating impacts, and facilitating immediate response through an Incident Management Team (IMT) process utilizing pre-planning and an Incident Command System (ICS). The Company's response planning and actions are driven by, in order of priority, protection of human health and safety, minimization of environmental impacts, and minimization of socio-economic impacts. The purpose of this plan is to describe the policies and procedures to be followed by Company personnel in responding to emergency conditions, as required by federal, state and local agencies.

The Plan complies with New Mexico Oil Conservation Division (NMOCD) Rule 11 (§19.15.11 et. seq. NMAC). The plan and operation of the Titan Gas Treatment Plant conform to standards set forth in API RP-55 "Recommended Practice for Oil and Gas Producing and Gas Processing Plant Operations Involving Hydrogen Sulfide", as well as API RP-49 "Recommended Practice for Drilling and Well Servicing Operations Involving Hydrogen Sulfide", API RP-68 "Oil and Gas Well Servicing and Workover Operations involving Hydrogen Sulfide", and applicable NACE standards for sour gas service and current best industry practices

The primary objectives of the Plan are to:

- Define notification, activation, and mobilization procedures to be followed when an incident occurs.
- Define organizational lines of responsibility to be adhered to during a response operation.

Titan Gas Treatment Plant Emergency Action Plan**Introduction**

- Document equipment, manpower, and other resources available to assist with the response. Identify procedures for obtaining equipment if an incident occurs within the Facility.
- Ensure compliance with the federal, state, and local emergency response regulations.

1.3 Scope of Plan

The purpose of this EAP is to provide effective organizational response to potential emergencies, in a timely manner. This includes implementing a systematic approach, the Incident Command System, to respond to an emergency. The step-by-step approach adopted in this plan will help to normalize an emergency situation as soon as possible yet be flexible enough to adapt to any size or type of emergency. The incident may be a fire, off-site or on-site spill, bomb threat, toxic release, multiple injury, earthquake, protest demonstration, security threat, etc.

The plan provides a general description of the Facility, outlines the response organizational structure, provides notification and call-out procedures and identifies appropriate response to potential incidents. A facility overview is provided as *Figure 1.2*. An overall site and evacuation plan for the plant is also included in this section.

1.3.1 H2S Contingency Scope

[API RP-55 7.2]

This Plan is specific to the Titan Gas Treatment Plant, associated Acid Gas Injection (AGI) facilities, and the AGI wells (Salt Creek AGI #1, #2 and #3). It contains procedures to provide for an organized response to a potential unplanned release of H2S from the Plant or AGI wells associated with the Plant, and documents the procedures that would be followed to alert and protect any members of the public, residents within the surrounding areas, and/or contractors working on or around the plant in the event of a potential unplanned release. The H2S Contingency Plan elements of this plan have been developed in coordination with state and local authorities and have been prepared to minimize the hazard resulting from a potential unplanned H2S release. It will be used to inform company personnel, local emergency responders and the public of actions to be taken should the Plant experience such an H2S release.

All operations shall be performed with safety to the employees, the public, and to protect the environment as the primary goal. The highest priority of the Titan Gas Treatment Plant, during a potential unplanned H2S release, is to protect company employees, contractors, and the public; the secondary concern is to minimize the damage and other adverse effects of the emergency. In the event of a release, any part of the Plant operation that might compromise the safety of individuals will cease until the operation can be re-evaluated and the proper engineering controls implemented to assure safety.

	WARNING: No individual should place the protection of the Plant property above his or her own personal safety.
---	---

Per NMOCD request, the Company will notify all producers with wells that feed into the Delaware Basin Sour Gas Gathering System that they are also subject to additional oversight and H2S regulations.

In a serious situation involving an H2S release, not only company personnel are involved, but local Fire Departments, Law Enforcement, City, County, and State of New Mexico agencies may be interested parties. Cooperation will expedite all decisions. In any emergency involving a H2S release, delegation of duties will be made to appropriate employees and groups. These duties and procedures are reviewed on an annual basis to ensure complete understanding and facilitate a well-coordinated response by all personnel involved in the emergency.

Safety precautions in the event of a release may include the placement of roadblocks, designated evacuation routes, or shelter-in-place instructions. When the term “shelter-in-place” is used within this Plan, it indicates that individuals should go inside homes, businesses, and turn off heating and air-conditioning systems, close windows and doors, seal the frames, and wait for further instruction from the Incident Commander.

The sour natural gas is sweetened within the Titan Treatment Plant and the associated waste gases (H₂S and CO₂) will be permanently sequestered in deep geologic reservoirs via the acid-gas injection (AGI) wells. The natural gas being transported by the Delaware Basin Sour Gas Gathering System contains hydrogen sulfide (H₂S) therefore, the H₂S Contingency Plan elements of this plan is provided to document procedures that are to be followed in the event of an unintended release of H₂S that occurs anywhere at the Plant, AGI processing area where the injection wells are, or will be located, or at the wells themselves. A separate H₂S Contingency Plan has been developed that covers the Titan Gathering System and compressor stations.

1.4 Plan Review and Update Procedures

Operations management, with support from the Emergency Preparedness Group representative and site safety, will support the plan development, maintenance and distribution. Plan review and updating will be done on the following basis:

- Annual review and update by local management and HES.
 - Address changes to the Plant facilities, operations, or training requirements, contact information and the public areas including roads, businesses, or residents potentially affected by the operations of the Plant and AGI well, specifically, those within the radii of exposure (during annual review)
- Plan review opportunities may occur during response team tabletop exercises or actual emergency responses.
- Significant changes at a facility that may affect response capabilities:
 - Names and/or telephone numbers of the response personnel;
 - Response procedures as necessitated by potential deficiencies identified during training or exercises;
 - Revised emergency response procedures;
 - Pertinent regulations.

1.4.1 Immediate Plan Updates

The Company will immediately modify its response plan to address a new or different operating condition or information that would substantially affect the implementation of a response plan and, within 30 days of making such a change, submit the change to all plan holders.

1.4.2 Submission of H₂S Contingency Plans

[NMAC 19.15.11.9.D]

Upon completion and internal approval of this H₂S Contingency Plan, the plan will be submitted to the NMOCD for review and approval. Upon approval by NMOCD, the plan will be retained as per corporate retention process and will be readily accessible for review by the NMOCD at the facility upon request.

1.4.3 Annual Inventory of Contingency Plans

The company will file an annual inventory of wells, facilities, and operations for which H₂S Contingency Plans are on file with the NMOCD with the appropriate Local Emergency Planning Committee (LEPC) and the State Emergency Response Commission as per NMAC 19.15.11.9H. The inventory shall include the name, address, telephone number, and point of contact for all operations for plans on file.

1.5 Facility Description, Maps and Drawings

[NMAC 19.15.11.9.B(2)(C)]

1.5.1 Facility and Process Description

The Titan Gas Treatment Plant, along with the associated Acid Gas Injection (AGI) well, the Salt Creek AGI #3 (30-025-51865), Salt Creek AGI #2 (30-025-53388), and plugged and abandoned Salt Creek AGI #1 (30-025-46746), is in Lea County, New Mexico. Information on the AGI wells is provided in the table below. Diagrams of the AGI wells are provided at the end of this section.

The Plant and AGI wells, when in operation, will be manned 24-hours-a-day, 7-days-a week. Plant operations include compression, treatment, and condensate stabilization. The Plant gathers produced natural gas from Lea County, New Mexico. Once gathered at the Plant, the produced natural gas is compressed to remove the water content. The inlet gathering lines and pipelines that bring gas into the Plant are regulated by DOT, NACE and other applicable standards which require that they be constructed and marked with appropriate warning signs along their respective rights-of-way.

Figure 1-4 shows the major process units and all major process equipment used to transport and treat sour gas. Because the natural gas that is gathered at the Plant contains H₂S (sour gas), it must be treated to remove these and other impurities. There are both high- and low-pressure inlets at the Plant. Low pressure gas from the gathering system is collected at the facility in a low-pressure slug catcher at 50 psig utilizing two 3616 three-stage compressors to boost pressure to 1000 psig where the H₂S and CO₂ and other impurities can then be removed from the gas stream. The high-pressure inlet enters the Plant at 450 psig. To get this gas to the facility, the Delaware Basin Sour Gas Gathering System utilizes three-stage compressors from either the Pelham, Eli, Flight, Siege, or Pelican Booster Stations, this gas is compressed to 1,000 psig at the facility utilizing three 3606 compressors and one 3608. After all inlet compression the gas stream is distributed between the 3 amine trains. T1 capacity is 50mmcf/d with a 550gpm circulation rate. T2 Capacity is 100mmcf/d with a 1300gpm circulation rate. T3 is a 50mmcf/d with a 600-gpm circulation rate. The treated high-pressure gas is metered as it is transported to takeaway pipelines. Condensates collected in the low-pressure slug catcher are routed to a condensate surge vessel. Using one stabilization unit, the natural gas liquids are separated out of the condensate. Both the condensate and the natural gas liquids are stored onsite prior to transportation away from the facility via truck or pipe. The condensate and natural gas liquids in the storage vessels will have much lower concentrations of H₂S, however, any stairs or ladders leading to the top of the vessels will be chained or marked to restrict entry pursuant to NMAC 19.15.11.12.E.

Because the natural gas that is gathered and processed at the Plant contains H₂S ("sour gas"), it must be treated or processed to remove these and other impurities. The CO₂ and H₂S stream that is removed from the natural gas in the amine treating process is compressed up to approximately 1,400 psig for AGI well #3. To get into the #2 AGI well the plant is utilizing dense phase pumps which compress the sour gas upwards of 3000psig. Water vapor contained in the gas stream is removed during compression and cooling. It is sent to a 500 BBL process water tank for truck load out. The compressed acid gas is transported via an underground corrosion-resistant stainless-steel pipe, to the AGI wells to be injected into UIC permitted underground geological formations. Gas sequestered via #3 AGI is injected into the Bell Canyon and Cherry Canyon formation (approximately 5,480-7,040 feet). AGI well #2 will be at a higher pressure as it is going into the Devonian formation (approximately 16,000-18,000 feet. H₂S sensors are located at critical junctions along the pipe, which will be racked over short distances near connections with the compressor and the wellheads. The pressure in the pipe is monitored continuously

Titan Gas Treatment Plant Emergency Action Plan

Introduction

so that the acid gas injection process could be stopped—should there be any unusual variations in pressure.

The plugged and abandoned Salt Creek AGI #1 (30-025-46746) is located on the treatment facility property. This well was drilled to TD in 2022 and subsequently plugged and abandoned in May 2023. The schematic of plugging operations is detailed within [Figure 1-5](#).

The operating acid gas injection wells, Salt Creek AGI #2 (30-025-53388) and Salt Creek AGI #3 (30-025-51865) are essential operating components of the Titan Gas Treatment Plant design. Each well incorporates a downhole “subsurface safety valve” (SSV) which is located below the surface on the production tubing. This equipment is to assure that fluid/gas cannot flow back out of the well due to a failure of injection equipment or other Plant related malfunction. In addition to the SSV installation, the annular space between the production tubing and the production casing are filled with corrosion-inhibited diesel fuel (an inert fluid) as a further safety measure, which is consistent with previous NMOC approved designs for acid gas injection. Well schematics for AGI #2 and AGI #3 are detailed in [Figure 1-6](#) and [Figure 1-7](#) respectively.

Per National Association of Corrosion Engineers (NACE) specifications, downhole components including the SSV and packer are constructed of corrosion resistant alloys (CRA). Basal joints in the CRA casing and joints in the tubing are also constructed of CRA materials. The gates, bonnets, and valve stems within the Christmas tree are CRA materials as well. The rest of the Christmas tree is made of standard carbon steel components and outfitted with annular pressure gauges that remotely report operating pressure conditions in real time to a gas control center. Pursuant to NMAC 19.15.11.12.D(2), in the event of abnormal pressures or any other situation requiring immediate action, the acid gas injection process can be stopped at the compressor, and the wellhead can be shut-in using a pneumatic wing valve on the Christmas tree. The Plant operator or IC may also shut the SSV on site or remotely from HMI. In addition, the injection tubing has profile nipples which provide the ability to insert a blanking plug into the base of the well below the packer, which would allow for the safe reentry into the well if needed. These safety devices provide for downhole accessibility and reentry under pressure for permanent well control. The SSV provides a redundant safety feature to shut-in the well in case the wing valves do not close properly. All the control equipment on the well is designed and constructed in a manner such that under a worst-case scenario, the well can be safely reentered under pressure to obtain permanent well control consistent with NMAC 19.15.11.12.D(2). Additionally, well control equipment is fully integrated into the Plant control system, such that any emergency shutdown of plant operations will trigger the activation of these components and isolate the well at the surface and approximately 100 feet below the surface.

Figure 1: Acid Gas Injection Well Location:

Salt Creek AGI #3 API:	30-025-51865
AGI #3 Well Surface Location:	278 FWL & 2,329 FSL LAT: 32.027965 (NAD83) LONG: -103.277702 (NAD83)
Salt Creek AGI #2 API:	30-025-53388
AGI #2 Well Surface Location:	311 FWL & 2,512 FNL LAT: 32.029128 (NAD83) LONG: -103.277598 (NAD83)
Salt Creek AGI #1 API: (plugged and abandoned)	30-025-46746
AGI #1 Well Surface Location:	177 FWL & 2,397 FSL LAT: 32.028103 (NAD83) LONG: -103.278026 (NAD83)

Figure 1.2 Titan Gas Treatment Plant Facility Overview**1.5.2 Maps and Figures**

<i>Figure 1-3</i>	Overview of Titan Gas Treatment Plant with 3 wells indicated for reference
<i>Figure 1-4</i>	Titan Safety Plan TTN-SPP-1000
<i>Figure 1-5</i>	AGI #1 Well diagram schematic
<i>Figure 1-6</i>	AGI #2 Well diagram schematic
<i>Figure 1-7</i>	AGI #3 Well diagram schematic
<i>Figure 1-8</i>	Schematic of surface facilities and AGI #2 and #3 wells
<i>Figure 2-1</i>	100 and 500 ppm ROE, escape routes, roadblock locations and emergency assembly areas

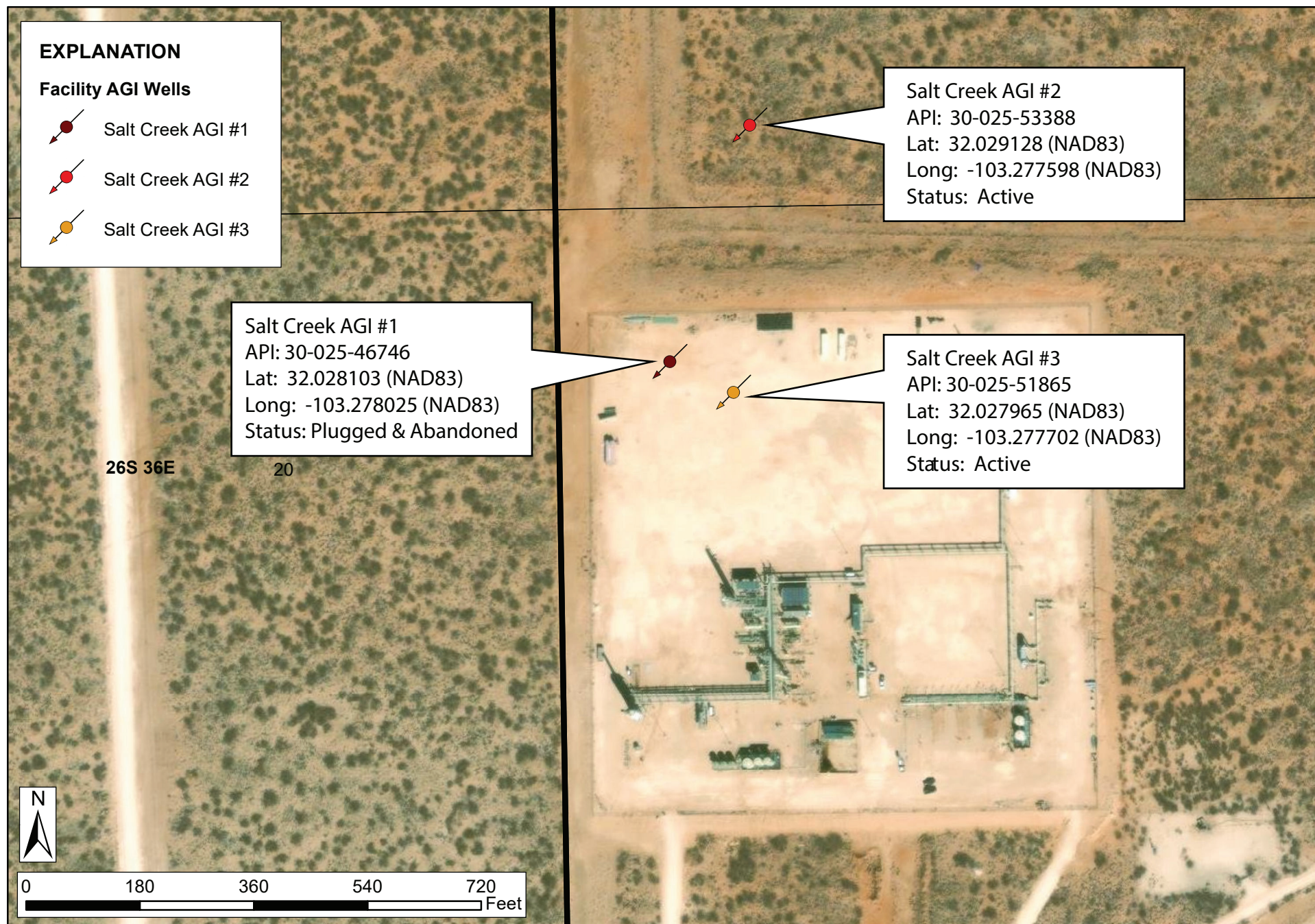


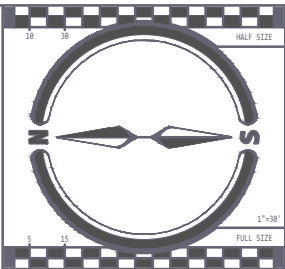
Figure 1-3: Overview of Titan Gas Treatment Plant with 3 wells indicated for reference.



The information and concepts contained in this document are confidential and the property of MPLX. Duplication or use of this information and/or construction of systems based on this document are strictly prohibited without written authorization from MPLX. Prior to design or field activities, a field verification should be conducted to ensure drawing accuracy and completeness.

[illegible]

ASSET:	TITAN TREATER PLANT #1
LOCATION:	JAL, NEW MEXICO
SAFETY PLAN	
OVERALL SITE	
SCALE: AS NOTED	TTN-SPP-1000



LEGEND:

- | | |
|---|--|
|  | BUILDING |
|  | CONTROL ROOM /
SDS BOOK LOCATION |
|  | HOT WORK AREA
(PERMIT REQUIRED) |
|  | DEFIBRILLATOR |
|  | EMERGENCY EXIT |
|  | EXIT |
|  | EVACUATION ROUTE |
|  | FIRE EXTINGUISHER
LOCATION (# IF GIVEN) |
|  | EYE WASH |
|  | FIRST AID LOCATION |
|  | PREVAILING WIND
DIRECTION |
|  | WIND SOCK |
|  | FIRE BLANKET |
|  | PRIMARY MEETING AREA |
|  | SECONDARY MEETING AREA |

ADDITIONAL SYMBOLS

- | | |
|---|----------------------------------|
|  | ALARM HORN |
|  | EDGE OF AREA |
|  | EMERGENCY LIGHT AMBER |
|  | EMERGENCY LIGHT BLUE |
|  | EMERGENCY LIGHT RED |
|  | ESD - EMERGENCY SHUT DOWN SWITCH |
|  | ESD VALVE |
|  | FIRE EYES |
|  | GAS DETECTOR |
|  | GATE |
|  | SMOKING AREA |
|  | SMOKE DETECTOR |
|  | SPILL RESPONSE MATERIAL |

NOTES:

1. SOME EQUIPMENT LOCATIONS ARE APPROXIMATE, THEREFORE NO ACCURACY OR COMPLIANCE IS EXPRESSED OR ASSUMED IN REGARD TO ABSOLUTE LOCATIONS.

WELLBORE SCHEMATIC

Salt Creek Midstream
Salt Creek AGI #1
2370' FSL, 594' FWL
Sec 21, T26S, R36E

Surface – (Conventional)

Hole Size: 12.25"
Casing: 9.625" – 40# J-55 BTC Casing
Depth Top: Surface
Depth Btm: 2100'
Cement: 670 sks Econocem w/5% Salt, 3# KOL Seal,
0.125 Poly-E-Flake, .25# D-air, .2% HR-800
Cement Top: Surface (Circulated)

Production Csg #1 – (Cut off)

Hole Size: 8.75"
Hole Depth: 7040'
Casing: 7.625" -29.7# L-80 FJ x 7" 29# SM2535 VAM TOP
Depth Top: 3140'
Depth Btm: 5687'
ECP/DV Tool: 4200'
Cement Stage 1 - CorrosaCem cement plug from 5680'-7040'
Stage 2 – CorrosaCem cement "spot & squeeze" from 3140' – 5680' utilizing cement
retainer set @ 3150' & perforations @ 5678'
Stage 3 – HalCem cement plug from 3140' - Surface Casing Shoe (Tied Back)

Production Hole#2 – (Side Track)

Hole Size: 8.75"
Hole Depth: 5511'
Drill Pipe: 4.5" 16.6# XH w/ float & 8.75" bit
Depth Top: 3880'
Depth Btm: 5111'

Cement Stage 1 - CorrosaCem cement to 3880'
Stage 2 – HalCem C from 3880' to 2100' (csg shoe)
Stage 3 – HalCem C from 2100' to surface

Cement Top: Surface (Circulated)

Perforations - (12 SPF - 60 deg phasing)

50' above and 50' below the
Reef/Delaware transition @ 5050'

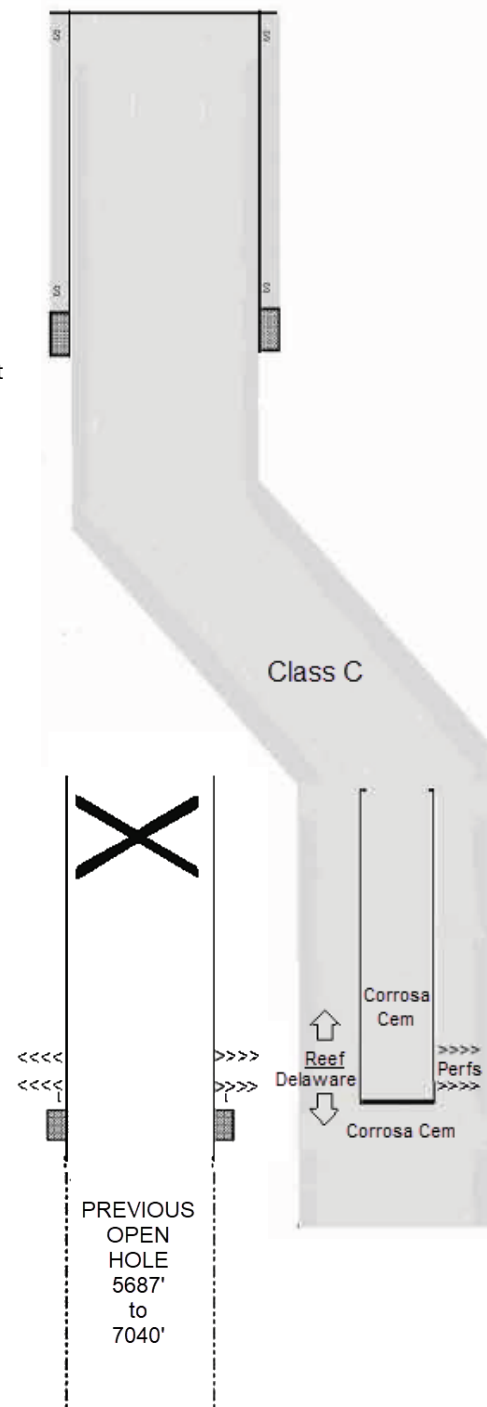


Figure 1-5 AGI #1 Well diagram schematic

WELL SCHEMATIC SALT CREEK

AGI #2 S21 - T26S - R36E

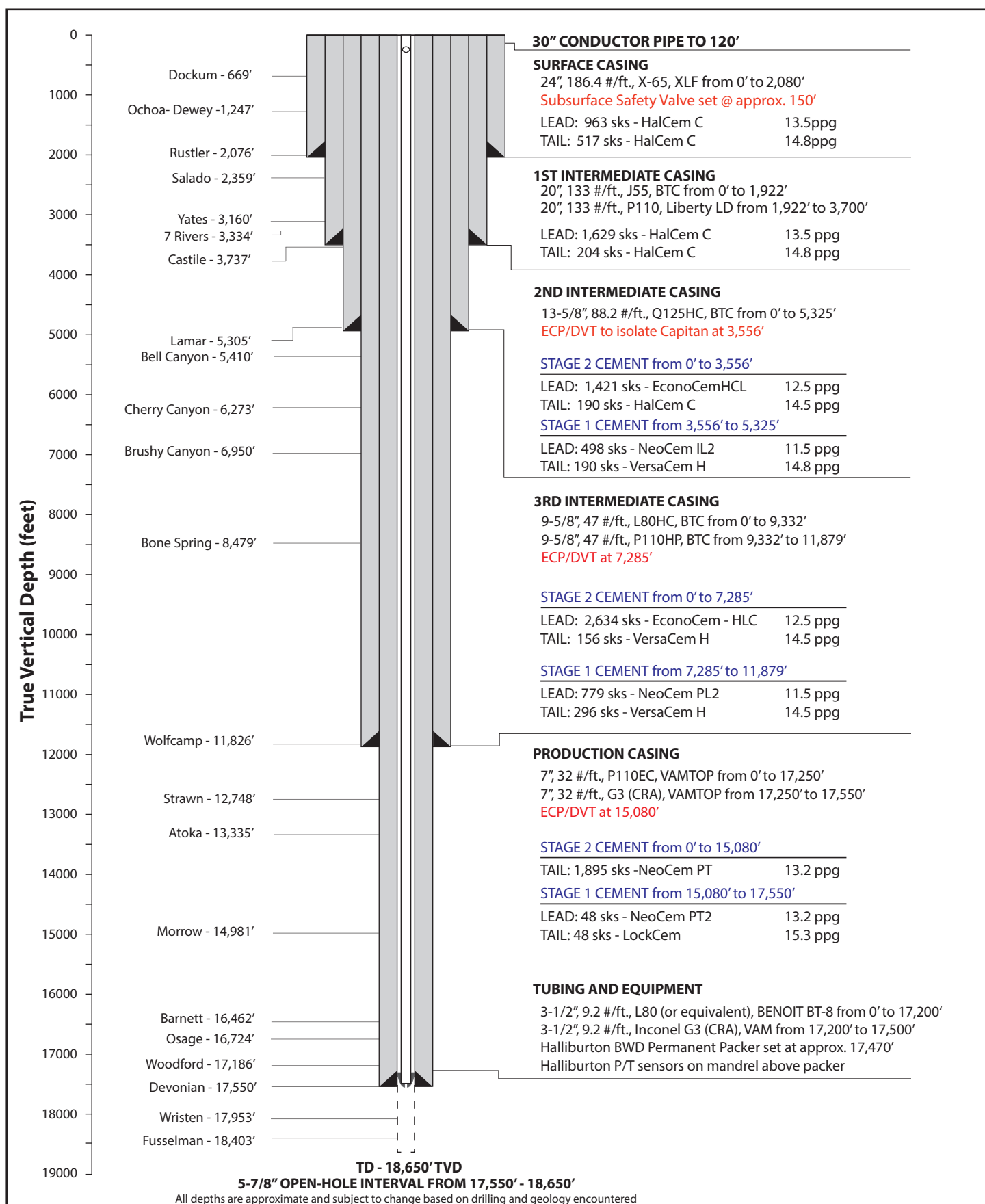
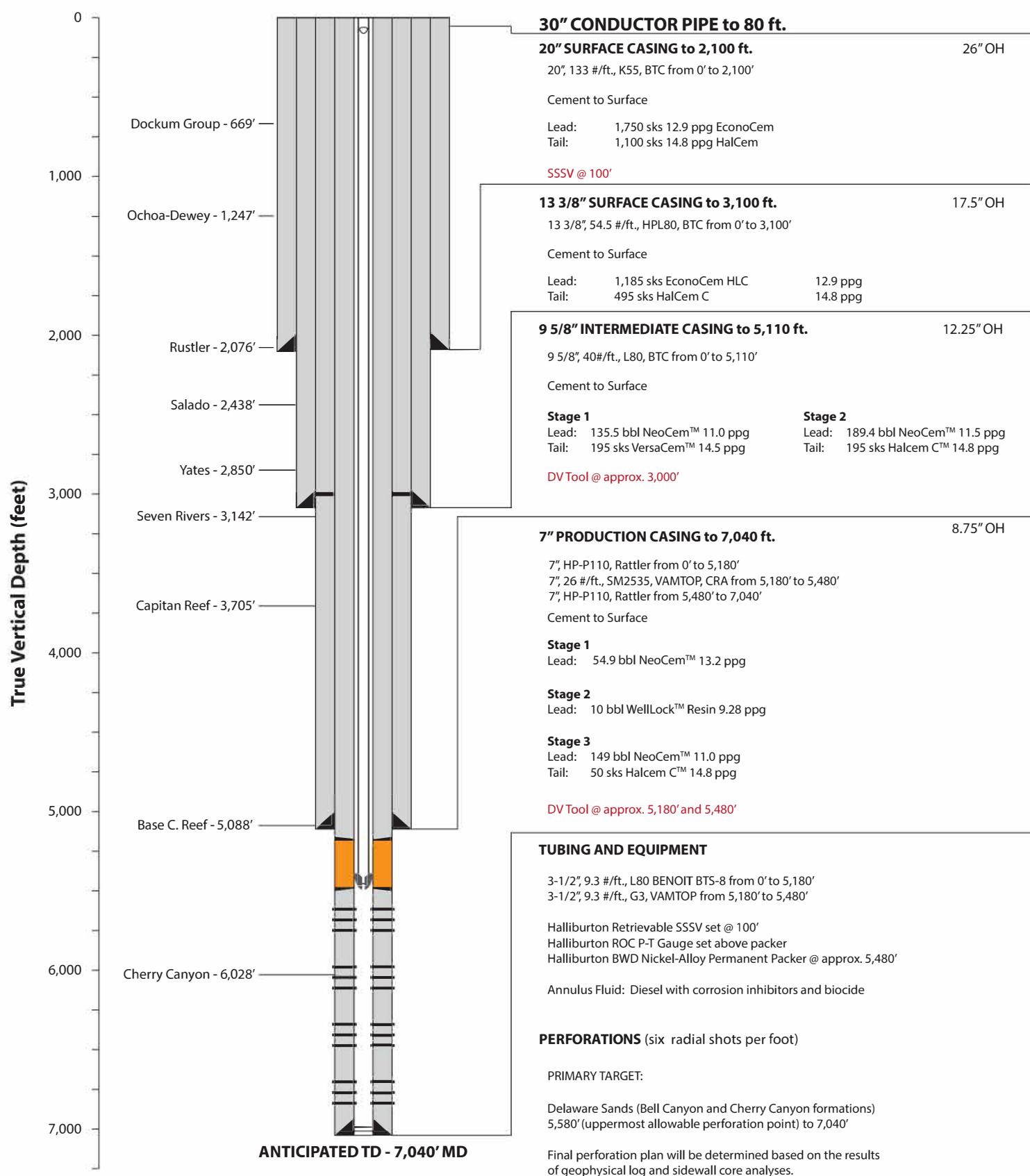


Figure 1-6 AGI #2 Well diagram schematic

SALT CREEK AGI #3 REVISED WELL SCHEMATIC



*All depths are approximate and subject to change based off of the geology encountered

Date prepared: 01/20/2023

Figure 1-7 AGI #3 Well diagram schematic

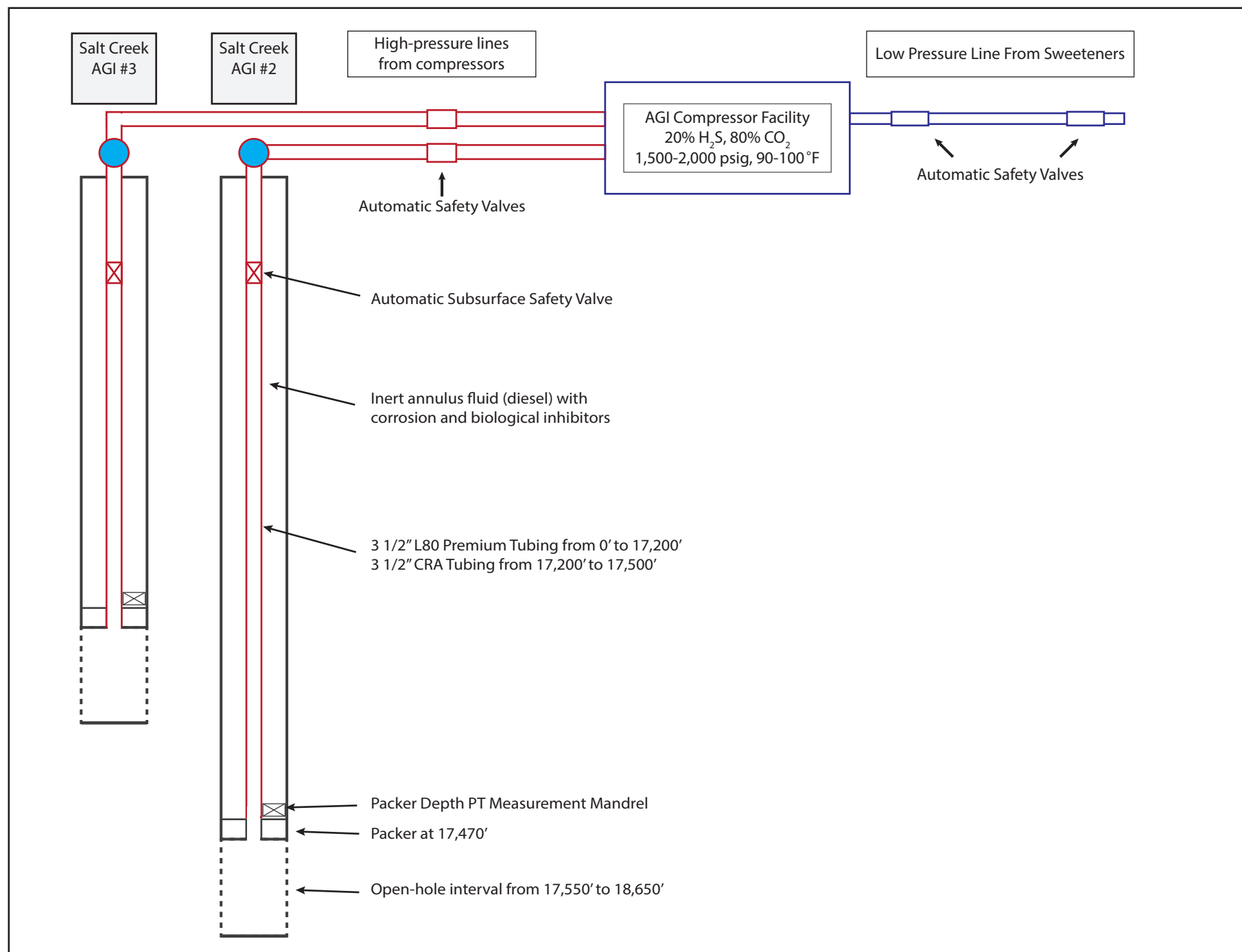


Figure 1-8 Schematic of surface facilities and AGI #2 and #3 wells

SECTION 2 IMMEDIATE ACTION PLAN/INITIAL RESPONSE GUIDE

2.1 Immediate Action Plan

Immediate Action Plans outlining procedures and decision processes to be used in the event of an H₂S release are provided here. These procedures and decision processes have been designed to ensure a coordinated, efficient, and immediate action plan for alerting and protecting operating personnel and the public as well as to prevent or minimize environmental hazards and damage to property.

Emergency response actions may be taken for a variety of situations that may occur. The Plan is activated in progressive levels (Level 1, Level 2 and Level 3), based on the concentration and duration of the H₂S release. Response Flow Diagrams illustrating these Immediate Action Plans are provided at the end of this section.



ATTENTION: Company on-site personnel or Control Room Operators are authorized to elevate the level of response, based upon observed conditions, if they feel a lower-level response may not be effective in protecting personnel, the public, or the environment.

Additional or long-term response actions will be determined on a case-by-case basis once the Incident Command Center (ICC) and System (ICS) are established following the immediate response.



NOTE: Per 19.15.11.16 NMAC and 19.15.29 NMAC, notification of Contingency Plan implementation will be submitted to the OCD via form C-141 within 15 days of a release greater than 50 MSCF. (Section 5)

2.1.1 Activation Levels

[NMAC 19.15.11.9.C], [API RP-55 7.4 D]

The Company commits to implement this Plan in response to the three activation thresholds that are described in the Immediate Action Plan and Response Flow Diagrams in this section.

- **Level 1:**
 - Ambient detection of H₂S at 10 ppm or greater
 - Employee/Personal H₂S monitor detection of ambient H₂S at 20 ppm or greater
- **Level 2**
 - Level 1 response unsuccessful
 - Ambient detection of H₂S at ≥ 50 ppm.
 - Control Room Operator manually activates evacuation alarm based upon perceived conditions.
- **Level 3**
 - Level 2 response unsuccessful
 - Ambient detection of H₂S at ≥10 ppm at Zone 2 Assembly
 - Catastrophic release; fire; explosion,
 - Continuous release of maximum volume for 24 hours;
 - As per NMAC 19.15.11 there is indication of a PHV in which 100ppm H₂S in any defined public area, 500ppm at any public road, or 100 ppm at a distance greater than 3,000 feet from the site of the release. (See [Section 2.4](#))

As soon as the Plan has been activated based on the criteria above, the plant manager or their designee, will be notified.

2.1.2 Events That May Lead to a Release of H₂S

- Inlet and plant piping failure

Titan Gas Treatment Plant Emergency Action Plan**Immediate Action Plan/IRG**

- Amine still failure
- Flange/gasket leaks on inlet and plant piping
- Flange/gasket leak on the acid gas compressors
- Flange/gasket or valve packing leak at the AGI well or associated piping
- Valve packing failure
- Seal failure on acid gas compressors
- Failure of flare to ignite during plant emergency blow down
- Damage to AGI wellhead

2.2 Level 1 Activation**ACTIVATING CONDITIONS:**

- H₂S of 10 ppm or greater detected at any fixed ambient monitor.
- H₂S of 20 ppm or greater detected on any employee/personal gas monitor

ALARMS AND AUTOMATED ACTIVATIONS:

- Fixed ambient detection of H₂S at 10 ppm or greater:
 - Activation of a “high” audible control room HMI alarm to notify the Control Room Operator.
- Employee/personal detection of H₂S at 20 ppm or greater
 - Activation of personal device alarms:
 - Audible (alarm)
 - Visual (flashing light)
 - Sensory (vibration)
- A computer in the Control Room and in the office of the Plant Manager establishes the location of the monitor(s), at the Plant or Wellsite, that has activated the alarm and/or amber beacons.
- All personnel are required to wear personal H₂S monitors in the facility.
- The horn and amber beacons are redundant systems which function independently of one another so that should one system fail, the other would remain active. These systems incorporate backup battery capabilities as recommended in API RP 55 which ensures their operation in the event of a power failure

ACTIONS

1. At the initial sound of an HMI audible alarm or the sight of an illuminated amber beacon (10 ppm), the Control Room Operator will verify alarm/release location, attempt to resolve the issue, and continue to monitor in-plant atmospheric conditions. Responding (field) Operator(s), in communication with the Control Room, will attempt to resolve the issue.
2. If Control Room Operator observes H₂S of 20 ppm or greater, all non-essential personnel will be directed to proceed, using the designated evacuation routes, to the nearest marked Zone 1 Assembly Area (See Muster Location Drawing, Section 1).
3. Responding Operator(s) in the vicinity of the alarm will don a 30-minute Self-Contained Breathing Apparatus (SCBA) and assist any person(s) in distress evacuating to Zone 1 Assembly Area.
4. Control Room Operator and Plant Manager will be notified of the release. Plant Manager or designee will assume the role of Incident Commander (IC). Control Room Operator will remain in the control room, identify the location(s) of the alarms and monitor H₂S concentrations throughout the Plant.
5. Responding Operator(s), equipped with SCBAs and 4-gas monitors, will assess the location of the alarm and attempt to make an initial determination of its cause and rule out potential false alarms based on sensor malfunction or other conditions. If the cause of the release is a minor problem such

Titan Gas Treatment Plant Emergency Action Plan**Immediate Action Plan/IRG**

as a packing or seal leak, the Operator(s) will attempt to take the necessary steps to correct the situation and eliminate the source of the release.

6. All personnel will be accounted for at Zone 1 Assembly Area using the Plant sign in sheet. Operators and employees will conduct atmospheric monitoring of Zone 1 Assembly Area(s) using a 4-gas monitor and report the findings to the Control Room. If H₂S concentrations reach 10 ppm or greater at Zone 1 Assembly Area, all personnel will be evacuated to Zone 2 Assembly Area using the designated routes (*Figure 2-1*).
7. If deemed necessary, Plant personnel as designated by the IC will contact local emergency response service providers (*Section 3*) and manually initiate the facility evacuation.
8. If the concentration of H₂S in the control room reaches 10 ppm, the Control Room Operator will ready a 30 Minute SCBA. If concentration reaches 20 ppm or greater, fully don a 30-minute SCBA.
9. IC will designate secondary re-entry teams in 30-minute SCBA's to re-enter and resolve the situation. Re-entry will occur in 15-minute increments at the direction of the IC until the problem is resolved or Operators activate ESD.
10. If corrective actions are successful, the Responding Operator(s) will notify the IC that the leak has been resolved. Responding Operators shall continue to monitor H₂S concentrations and other atmospheric conditions using portable 4-gas monitors. Simultaneously, plant conditions will be monitored via the SCADA system from the control room or remotely, with all readings relayed to the IC. Once H₂S concentrations have decreased to below 10 ppm throughout the plant, the IC or their designee will issue an "All Clear." Personnel will then be authorized to sign in and re-enter the plant to resume normal operations.

If the release is not resolved and H₂S concentrations continue to increase, the IC will escalate the situation and initiate a Level 2 Response.

11. The IC will initiate and document actions on an ICS-201 (*Section 5*).

2.3 Level 2 Activation

ACTIVATING CONDITIONS:

- Corrective actions at Level 1 are unsuccessful.
- Ambient detection of H₂S at 50 ppm or greater
- Control Room Operator manually activates evacuation alarm based upon perceived conditions.

ALARMS AND AUTOMATED ACTIVATIONS:

- Detection of H₂S at 50 ppm or greater:
 - Single sensor detection activates the audible plant siren (5 second Euro-Fire Sweep Tone) and evacuation messaging stating "Attention! Evacuate to a safe area". (See Section 2.2)
 - Grouped sensor detection utilizes voting logic to initiate local process shutdown (PSD)
 - Illumination of amber beacons within Plant
 - Activation of a "high-high" audible control room HMI alarm to notify the Control Room Operator.
- Control Room Operator or Plant Manager manually activates evacuation alarm based upon perceived conditions.
 - Facility siren (5 second Evac-Amplitude Modulated Siren) and evacuation messaging stating "Attention! Evacuate to a safe area" is activated.
- Facility automated ESDs may proactively trigger a shutdown to minimize Level 2 events and/or prevent the potential for Level 3 events.
- A Continuous facility-wide evacuation horn and illuminated amber beacons will occur. The horn and beacon beacons are redundant systems which function independently of one another so that should

REVISION 1**June 2026****2-3**

Titan Gas Treatment Plant Emergency Action PlanImmediate Action Plan/IRG

one system fail, the other would remain active. These systems incorporate backup battery capabilities as recommended in API RP 55 which insure their operation in the event of a power failure.

ACTIONS

1. If a monitor (or two within the AGI area, or around the AGI compressor) detect 50 ppm H₂S or greater, the automated ESD, Control Room Operator, or Plant Manager may proactively trigger a shutdown of the AGI Compression to minimize the potential for Level 3 events.
2. Upon activation of the audible plant siren/evacuation message, all non-essential personnel shall evacuate to a marked Zone 1 Assembly Area via designated routes (Figure 2-1).
 - a. The Responding Operator(s) will fully don SCBAs and assist any person(s) in distress evacuate to Zone 1 Assembly Area (Figure 2-1).
 - b. The Plant Manager and the Control Room Operator will be notified. The Plant Manager, or designee will assume the role of IC. The Control Room Operator will ready a SCBA, remain in the control room, and monitor H₂S concentrations throughout the Plant.
 - c. If the concentration of H₂S in the control room reaches 10 ppm, the Control Room Operator will ready a 30 Minute SCBA. If concentration reaches 20 ppm or greater, fully don a 30- minute SCBA.
3. Responding Operator(s), equipped with SCBAs and 4-gas monitors, will assess the location of the alarm and attempt to make an initial determination of its cause and rule out potential false alarms based on sensor malfunction or other conditions. Operator(s) will attempt to take the necessary steps to correct the situation and eliminate the source of the release.
4. Upon Level 2 activation, Operators (in proper PPE), will conduct perimeter monitoring using a 4-gas meter and report the findings to the control room.
5. If the perimeter monitoring detects 10 ppm H₂S at a Zone 1 Assembly Area or Control Room:
 - a. All evacuated personnel shall relocate to a marked Zone 2 Assembly Area and be accounted for using the Plant sign-in sheet.
 - b. IC will designate personnel at Zone 2 Assembly to perform continuous atmospheric testing with 4-gas monitors.
 - c. IC will designate personnel to stage emergency response trailers/equipment at Zone 2 Assembly Area
 - d. IC will determine the need to establish Incident Command Center (ICC) at Zone 2 Assembly Area and/or Media Staging area at Zone 3 Assembly Area (or other location)
6. Operator re-entry will occur in full SCBA and at 15-minute increments at the direction of the IC until IC determines problem has been resolved.
7. If monitoring detects **any concentration** of H₂S at Zone 2 Assembly Areas:
 - a. Designated personnel will notify all entities, individuals, and producers within the 500 and 100 ppm ROE of the nature of the release and the status of containment. All will be instructed to evacuate, or shelter in place, depending on the nature of the release and the prevailing wind conditions. They will be instructed to immediately alert all company personnel, third party contractors and/or service companies working in the area and those imminently scheduled to work in the area of the Plant evacuation status and advise them to leave and not enter or re-enter the Plant vicinity until further notice.
 - b. Notifications by designated personnel will commence as follows:
 - i. Anyone in immediate danger such as plant personnel or contractors on site
 - ii. All entities, individuals, and producers within 500 and 100 ppm ROE

Titan Gas Treatment Plant Emergency Action Plan**Immediate Action Plan/IRG**

8. If corrective actions are successful, the Responding Operator(s) will notify the IC that the leak has been resolved. Responding Operators shall continue to monitor H₂S concentrations and other atmospheric conditions using portable 4-gas monitors. Simultaneously, plant conditions will be monitored via the SCADA system from the control room or remotely, with all readings relayed to the IC. Once H₂S concentrations have decreased to below 10 ppm throughout the plant, the IC or their designee will issue an "All Clear." Personnel will then be authorized to sign in and re-enter the plant to resume normal operations.
If the release is not resolved and H₂S concentrations continue to increase, the IC will escalate the situation and initiate a Level 3 Response.
9. All entities and individuals previously notified will be informed that the release has been resolved and advised of the current monitored H₂S levels.
10. Level 3 Response Shall be initiated by the IC if:
 - a. Monitored H₂S levels at Zone 2 Assembly Area are 10 ppm H₂S or greater. All personnel will evacuate to Zone 3 Assembly Area via designated route (Figure 2-1).
 - b. The release is not resolved or H₂S levels continue to increase to a PHV, the IC will initiate a Level 3 Response.
11. The IC will initiate and document actions on an ICS-201 (Section 5)

2.4 Level 3 Activation**ACTIVATING CONDITIONS:**

- Corrective actions at Level 2 are unsuccessful
- H₂S concentrations reach 10 ppm or greater at Zone 2 Assembly Area
- Catastrophic release, fire, or explosion
- Continuous release of maximum volume for 24 hours occurs
- As per NMAC 19.15.11 there is indication of a PHV in which 100ppm H₂S in any defined public area, 500ppm at any public road, or 100 ppm at a distance greater than 3,000 feet from the site of the release.

ACTIONS

1. All personnel shall have been or will immediately be evacuated to and accounted for at a marked Zone 3 Assembly Area using the Plant sign in sheet, and air quality will be monitored for H₂S concentrations utilizing 4-gas monitors. (Figure 2-1).
2. IC shall have activated or will immediately activate Plant ESD.
3. The ICC and media staging area shall be established and/or moved to Zone 3 Assembly Area.
4. Dispatch personnel with emergency trailers to move or establish designated Level 3 roadblocks on SR128 to prevent entry into the 100 ppm ROE (see Figure 4). Monitor H₂S concentrations at the roadblocks.
5. Local emergency responders, state agencies, including the OCD District Office, will be notified of the release and status of containment (phone numbers provided in Appendix C).
6. All individuals and entities within the 100 ppm ROE will already have been or shall be notified to evacuate or shelter in place. IC will review the status of evacuation and make the final decision whether individuals within the 100 ppm ROE should evacuate or shelter in place based on, but not limited to H₂S concentration, wind conditions and whether a safe evacuation can be implemented. If individuals within the 100 ppm ROE are instructed to evacuate, IC will recommend an evacuation route. All entities will be instructed to immediately alert all company personnel, third party contractors and/or service companies working in the area and those imminently scheduled to work in the area of the Plant evacuation status and advise them to leave and not enter or re-enter the Plant vicinity until further notice. All will be advised of the roadblocks deployed along SR128.

REVISION 1**June 2026****2-5**

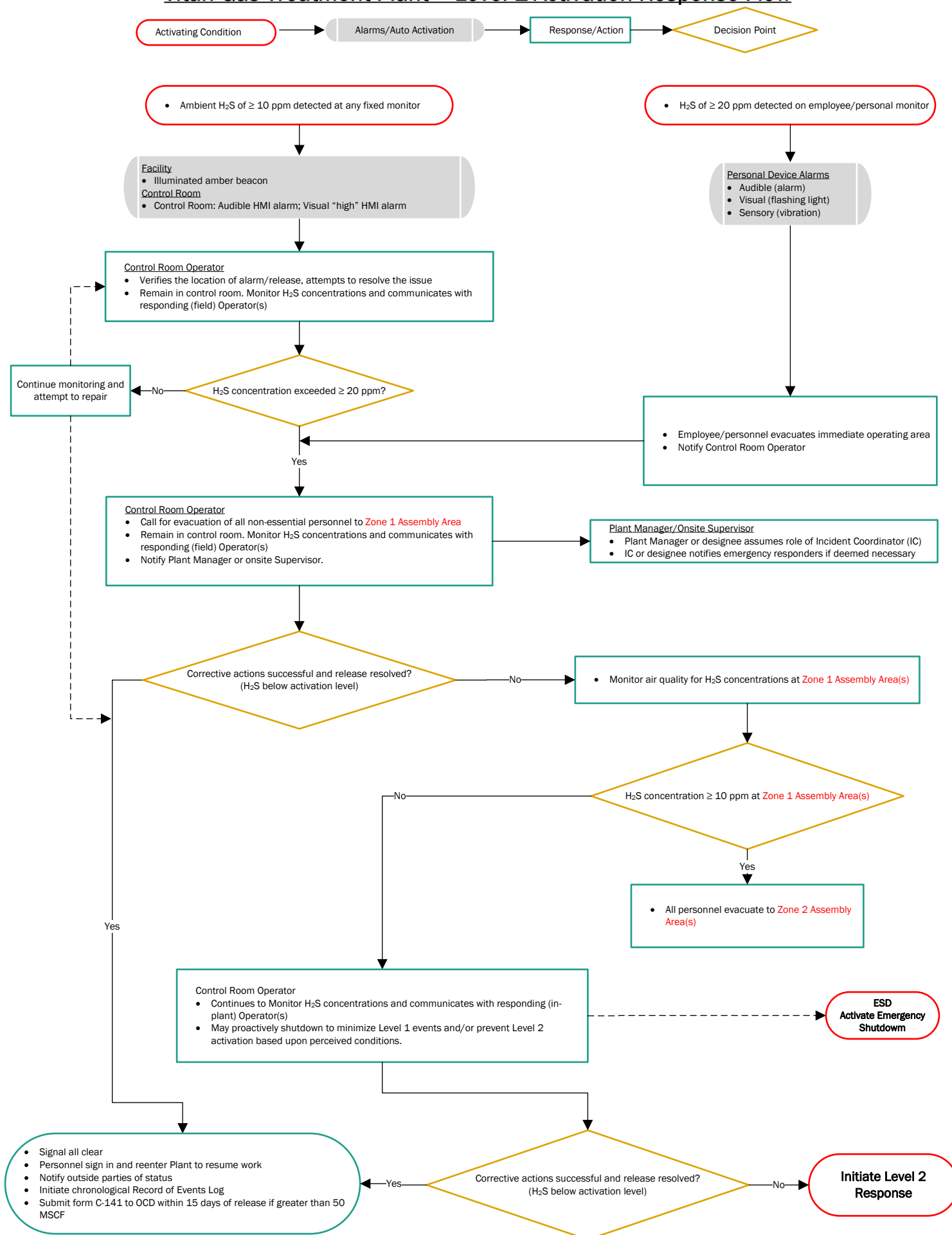
Titan Gas Treatment Plant Emergency Action Plan**Immediate Action Plan/IRG**

7. If escaping vapors have been ignited, the vapors should be allowed to continue to burn unless the fire endangers personnel, the public, other property, or other equipment.
8. Re-entry shall be conducted using appropriate personal protective equipment (PPE), including portable 4-gas monitors and full-face SCBA, with cascade breathing air systems as required. Re-entry activities will be performed under the direction of the IC and shall continue until the IC determines that the hazard has been fully mitigated and conditions are safe.
9. Upon successful corrective actions, the Responding Operator(s) will notify the IC that the incident has been resolved. Responding Operators shall continue to monitor H₂S concentrations and other atmospheric conditions using portable 4-gas monitors. Simultaneously, plant conditions will be monitored remotely via the SCADA system, with all readings relayed to the IC. Once H₂S concentrations have decreased to below 10 ppm throughout the plant, the IC or their designee will issue an "All Clear." Personnel will then be authorized to sign in and re-enter the plant to resume normal operations.
10. All entities and individuals previously notified will be informed that the release has been resolved and advised of the current monitored H₂S levels at the Plant. Roadblocks will be recalled and traffic will be restored.
11. The IC will initiate and document actions on an ICS-201 ([Section 5](#))
12. The Plant Manager or designee will contact the Oil Conservation Division (OCD) district office within 4 hours of a release that activates the plan at Level 3.

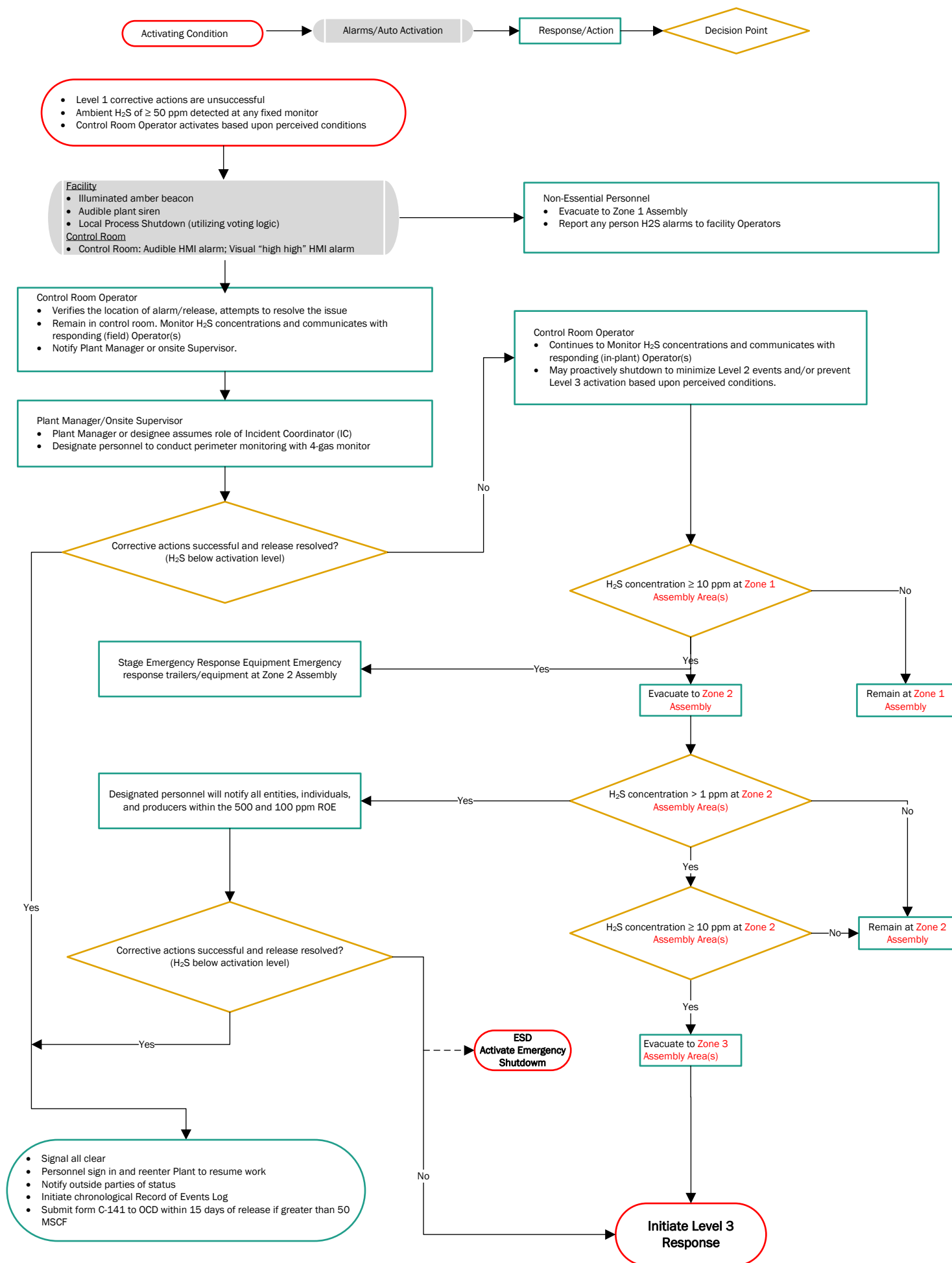
2.4 Initial Response Guide

An Initial Response Guide is provided at the end of this section for non- H₂S emergencies. This form is standard with all MPLX Emergency Action Plans and is provided as a guideline for initial response.

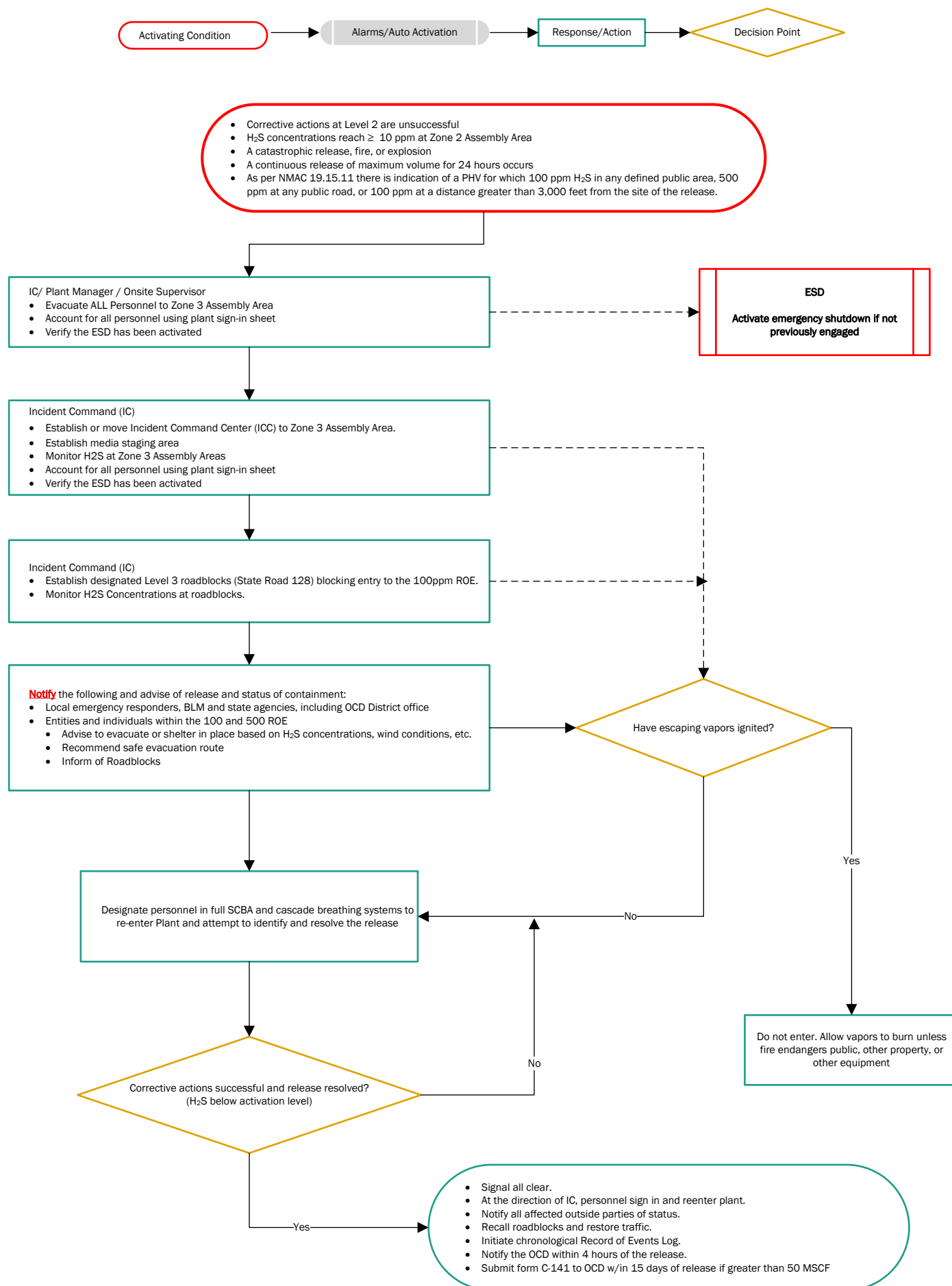
Titan Gas Treatment Plant – Level 1 Activation Response Flow



Titan Gas Treatment Plant – Level 2 Activation Response Flow



Titan Gas Treatment Plant – Level 3 Activation Response Flow



THIS PAGE INTENTIONALLY LEFT BLANK

ROE MAP

Facility

Titan Facility

Legend

- Alternate Escape Route
- Escape Route
- 100-ppm
- 500-ppm
- MPLX NG&NGL Facility

ROE Points

- Emergency Assembly Area
- Public Receptor
- Release Point
- Road Block
- Emergency Exit Gate

Worst-case-scenario radius of exposure map for the Titan Treatment Plant in the event of an unplanned release of H2S. Roadblocks and emergency assembly areas are set along Beckham Rd and Frying Pan Rd, immediately outside of the 500-ppm ROE (1.31 mi) and the 100-ppm ROE (2.86 mi).

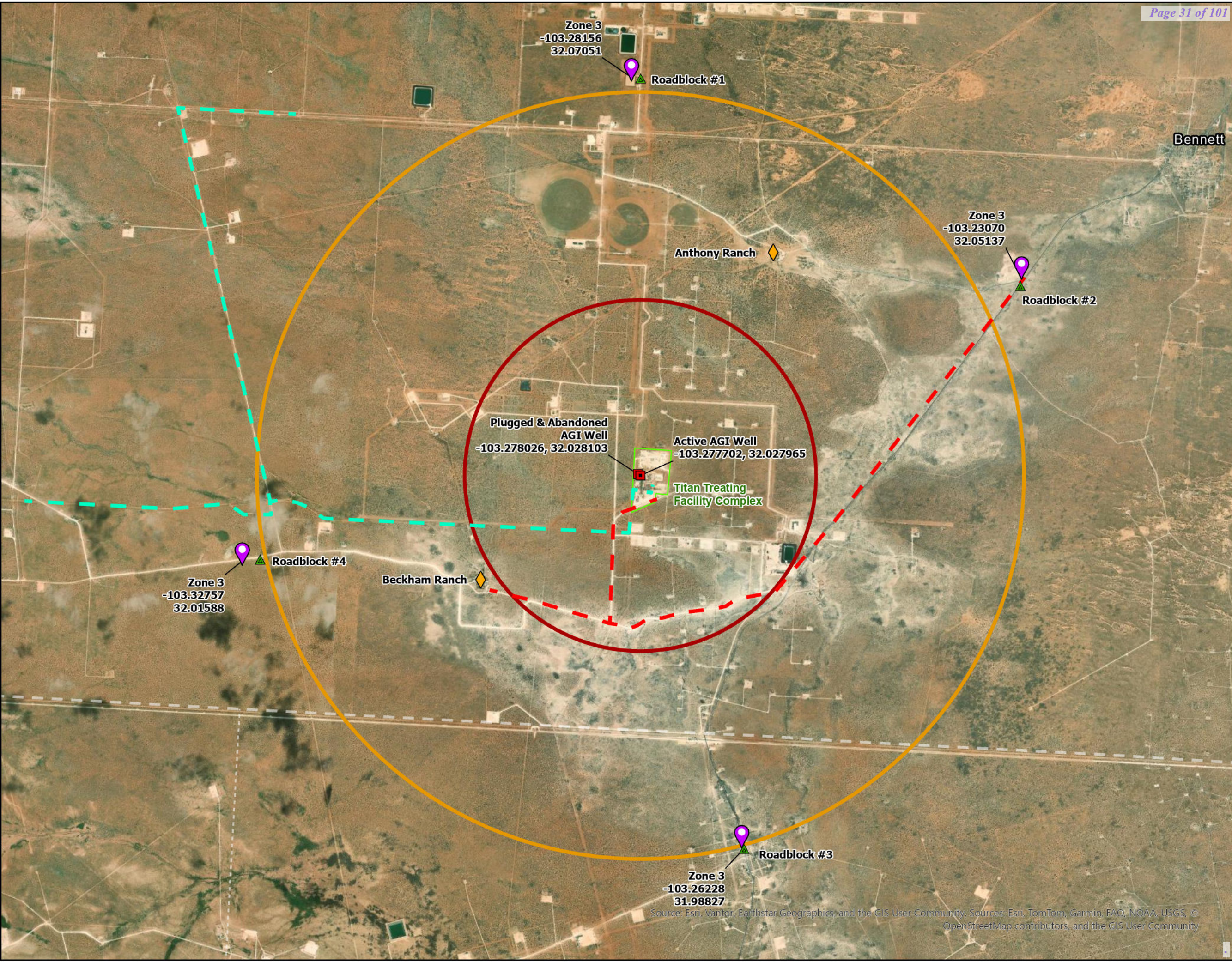


Figure 2-1

6/18/2026

The Information and Concepts contained in this Document are confidential and the property of Marathon Petroleum and/or the client identified. Duplication or use of this information and/or construction of systems based on this document are strictly prohibited without written authorization from Marathon Petroleum.

Released to Imaging: 7/2/2026 9:19:02 AM



This Page Intentionally Left Blank

Oil Spill

- ## Shut down, Isolate and Deny Entry

- ### Notifications (Section 3)

- 2

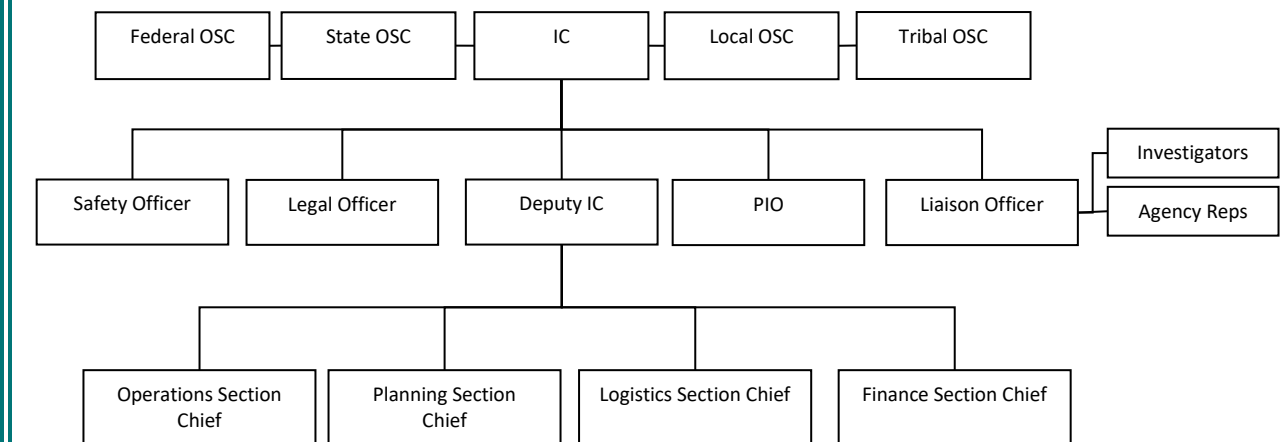
- ## Identification and Assessment

- ## Action Planning

- ## Initial ICS Forms that May Be Utilized

- ## General Protection Strategies

- ## Incident Command System Organization Chart



3

- ## Containment & Control

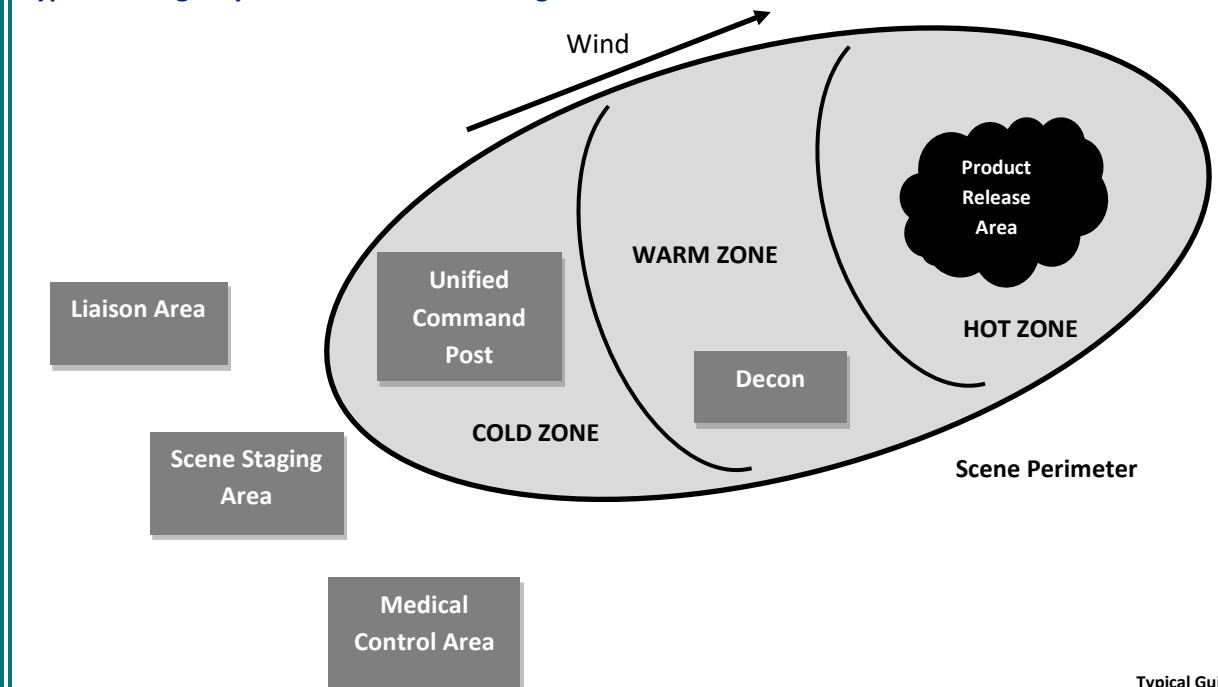
- ## Protective Actions

- 4

- ## Disposal

- ## Documentation

- ### Typical Emergency Scene Control Zone Diagram



Typical Guide

This Page Intentionally Left Blank

SECTION 3 NOTIFICATION

3.1 Initial Notification

Emergencies require quick response; therefore, delays at any level of the notification process must be avoided. In the event of an emergency condition, it is imperative that all personnel, regardless of position or title, understand what actions they must take to accurately and efficiently complete the notification process. This includes both internal and external stakeholders.

The first Company employee to discover a fire, chemical release, urgent medical condition, or other emergency will be responsible for initiating the notification procedures and will act as the incident commander (IC) until relieved by a competent IC.

3.2 NOTIFICATION REQUIREMENTS

It should be noted that the obligation to report immediately takes precedence over obtaining all the information outlined in the checklist.



ATTENTION: Notifications to the appropriate external agencies will not be delayed solely to gather all required information.

3.3 DATA REPORTING

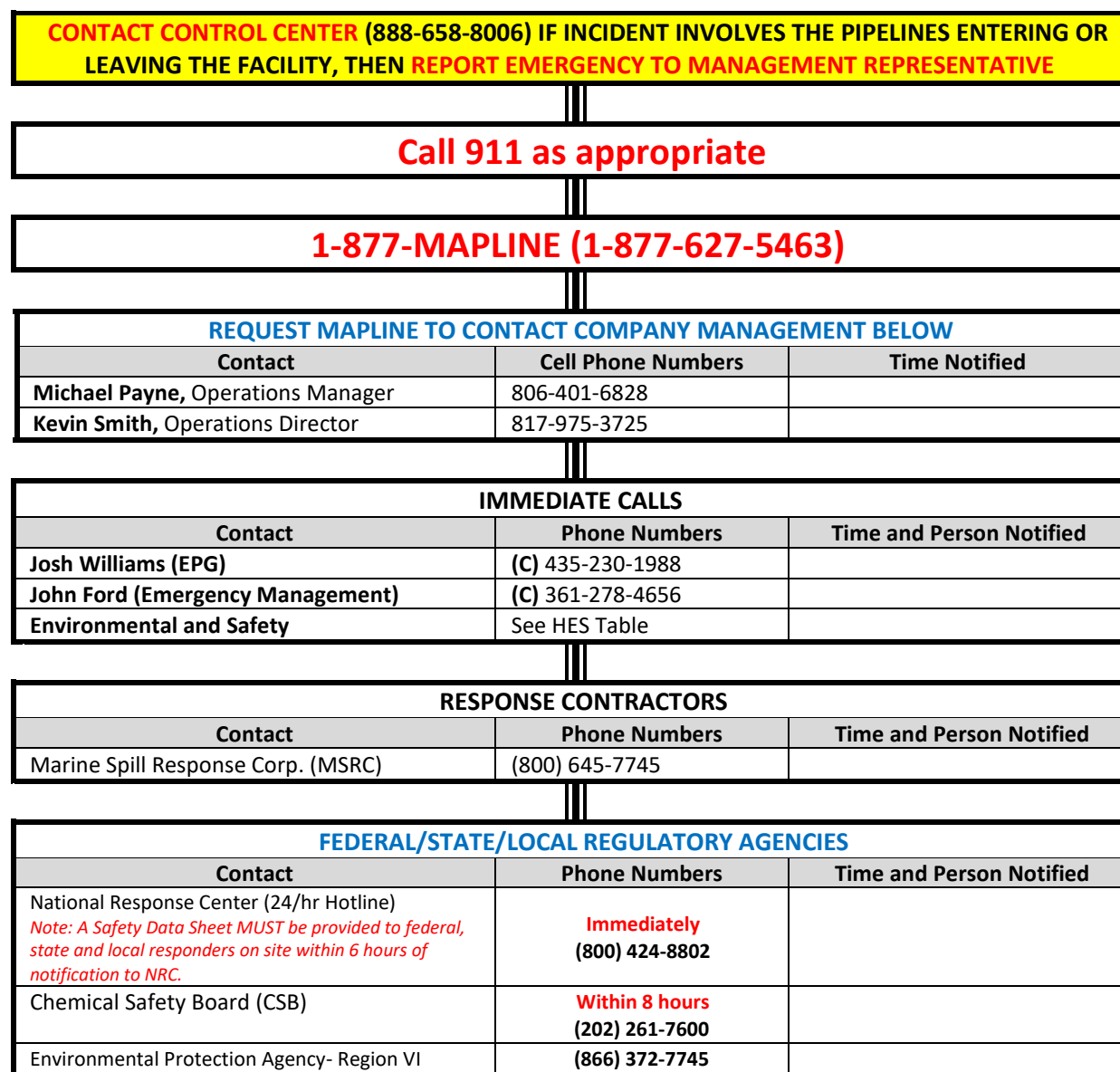
The Company employee who discovers an emergency condition or receives initial notification of an emergency or abnormal condition, should try to obtain the following information. This will provide the pertinent data to ESS in order to initiate an immediate report to the applicable agencies and personnel on the notification list. Although additional notification information may be required by local, state and federal reporting requirements, do not delay notification to complete the gathering of information.

1. Location of emergency	6. Cause of emergency.
2. Was anyone hurt?	7. Actions taken.
3. Time of emergency	8. Weather conditions.
4. Type of emergency	9. Equipment needed.
5. Product/volume involved.	10. Environmental concerns.

Titan Gas Treatment Plant Emergency Action Plan

Notification

Figure 3.1 Incident Reporting



Titan Gas Treatment Plant Emergency Action Plan

Notification

Regulatory Agency Notification Requirements			
AGENCY	SPILL SIZE	VERBAL REPORT	WRITTEN REPORT
National Response Center (EPA, and DOT notified)	- Immediately for all spills that impact or threaten navigable water or adjoining shoreline - Any size on land if threatening surface waters - Fire/explosion/injury from regulated pipeline	Immediately (800) 424-8802 Note: A Safety Data Sheet MUST be provided to federal, state and local responders on site within 6 hours of notification to NRC	N/A
EPA Region VI (NM)	- Applicable discharges to navigable waters of the United States or adjoining shorelines: - More than 1,000 gallons of oil in a single event - Two discharges of more than 42 gallons each within any 12-month period - Any spill that may affect natural resources under U.S. jurisdiction	Immediate to NRC (National Response Center) required for all PHMSA incidents	Within 60 Days a written report submitted to the EPA Regional Administrator
Chemical Safety Board	- An unanticipated release of an extremely hazardous substance that results in a serious injury or substantial property damage where: "serious injury" is an injury or illness which results in death or an inpatient hospitalization; "substantial property damage" is damage to on-site and off-site property, including "loss of use" that exceeds \$1 million in combined property damage.	Within 8 hours: Verbal or email notification to the Chemical Safety Board. <u>CSB</u> (202) 261-7600 - report@csb.gov	N/A
New Mexico Energy Minerals and Natural Resources Department (EMNRD) Oil Conservation Division (OCD)	<u>Major Release:</u> ≥ 500 MCF of gas ≥ 25 barrels of liquids (excluding gases) - Any volume causing or resulting from a fire - Any volume that may likely reach a watercourse - Any volume that may likely endanger public health - Substantial property or environmental damage - Any volume likely detrimental to fresh water	Within 24 hours: Verbal or email notification to OCD District Office & Environmental Bureau Chief. <u>District 1 (Hobbs)</u> - Office: 575-393-6161 - Emergency: 575-626-0830	Within 15 days: Written Form C-141 to OCD District Office
	<u>Minor Release:</u> > 50 MCF and < 500 MCF of gas > 5 barrels and < 25 barrels of liquids	N/A	Within 15 days: Written Form C-141 to OCD District Office
New Mexico Public Regulation Commission (PRC) Pipeline Safety Bureau (PSB)	<u>Refer to PHMSA specific requirements below.</u> PSB enforces federal PHMSA pipeline safety incident thresholds (no separate state thresholds)		
DOT/PHMSA (Applied by PSB)	<u>Gas Pipeline (49 CFR Part 191)</u> - Fatality or hospitalization - Property damage ≥ \$50,000 - Estimated property damage, including cost of cleanup and recovery, value of lost product, and damage to the property of the operator or others, or both. - Unintentional gas loss - Explosion or fire - LNG facility emergency shutdown	Immediate to NRC (National Response Center) required for all PHMSA incidents Immediate to the DOT Office of Pipeline Safety Hotline. 48 Hours – Follow-up report to the NRC <u>DOT Office of Pipeline Safety Hotline</u> (202) 366-4595	30 Days - Written accident report the via PHMSA portal (http://phmsa.dot.gov)
	<u>Hazardous Liquid Pipeline (49 CFR Part 195)</u> - Fatality or hospitalization - Property damage ≥ \$50,000 - Release ≥ 5 gallons (unless fully contained on facility) - Release ≥ 1 barrel outside containment - Fire / explosion - Waterway pollution	Immediate to NRC (National Response Center) required for all PHMSA incidents Immediate to the DOT Office of Pipeline Safety Hotline. 48 Hours – Follow-up report to the NRC <u>DOT Office of Pipeline Safety Hotline</u> (202) 366-4595	30 Days - Written accident report on Form 7000-1 via PHMSA portal (http://phmsa.dot.gov)
	<u>Hazardous Liquid Pipeline (49 CFR Part 195)</u> If 5 gallons or more of hazardous liquid or carbon dioxide escapes from a DOT-regulated pipeline, it	Immediate to NRC (National Response Center) required for all PHMSA incidents	30 Days - Written accident report on Form 7000-1 via PHMSA portal (http://phmsa.dot.gov)

REVISION 1
June 2026

3-3

Titan Gas Treatment Plant Emergency Action Plan**Notification**

	must be reported unless the exceptions below apply: ○ It happened during pipeline maintenance, and ○ It is not otherwise reportable (no fire, injury, death, big damage), and ○ It is fully contained on company property or ROW, and ○ It is cleaned up promptly.		
New Mexico Environmental Department (NMED)	• Notify within 24 hours of discovery. • Submit Incident Report as soon as practicable after discovery. • Submit electronic copy written report to NM SLO email.	505-827-9329 Spills@slo.state.nm.us	

Titan Gas Treatment Plant Emergency Action Plan

Notification

FEDERAL AGENCIES			
AFFILIATION	PHONE NUMBER	PERSON CONTACTED	TIME CONTACTED
National Response Center	800-424-8802		
EPA – Region 6	800-887-6063 214-665-2200		
Chemical Safety Board	202-261-7600		

STATE AGENCIES – New Mexico			
AFFILIATION	PHONE NUMBER	PERSON CONTACTED	TIME CONTACTED
New Mexico Department of Public Safety – State Emergency Response Commission (SERC)	505-476-0617		
New Mexico Department of Homeland Security and Emergency Management (NMDHSEM)	505-476-9635		
New Mexico Energy, Minerals and Natural Resources Department – Oil Conservation Division - District 4 – Santa Fe - District 1 – Lea County - Oil Conservation Division Director	505-476-3441 505-629-6116 505-476-3460		
New Mexico Environmental Department - Emergencies (24 hours/day) - Spills/Non-Emergency Reporting (24 hours/day) - Main Office - Surface Water Quality Bureau - Hazardous Waste Bureau	505-827-9329 (866) 428-6535 505-827-2855 505-827-0187 505-476-6000		
New Mexico Bureau of Land Management - Santa Fe, NM State Office - Albuquerque District Office	505-954-2000 505-761-8700		
New Mexico State Police - Hobbs, NM District Office - Carlsbad, NM District Office	575-392-5588 575-885-3138		

STATE AGENCIES - Texas			
AFFILIATION	PHONE NUMBER	PERSON CONTACTED	TIME CONTACTED
TCEQ Region 6 - Midland Office - Emergency Spill Reporting	(432) 570-1359 (800) 832-8224		
Texas Parks and Wildlife	(512) 389-8165		
State Police	(432) 498-2140		

LOCAL AGENCIES – New Mexico			
AFFILIATION	PHONE NUMBER	PERSON CONTACTED	TIME CONTACTED
Lea County Office of Emergency Management	575-391-2983		
Lea County Environmental Services Director	575-605-6561		
City of Jal City Manager / City Hall	575-395-3340		
Lea County Sheriff's Department	575-396-3611		
Jal Police Department	575-395-2501		
Hobbs Police Department	575-397-9265		
Jal Fire/EMS Department	575-395-2221		
Eunice Fire/EMS Department	575-394-3258		
Hobbs Fire/EMS Department	575-397-9308		

REVISION 1
June 2026

3-5

Titan Gas Treatment Plant Emergency Action Plan

Notification

LOCAL AGENCIES - Texas			
AFFILIATION	PHONE NUMBER	PERSON CONTACTED	TIME CONTACTED
Winkler County Emergency Management	(432) 527-8856		
Winkler County Sheriff	(432) 586-3461		
Wink City Fire Department	(432) 527-3333		
Kermit Fire Department	(432) 586-2577		

RESPONSE CONTRACTORS/COOPERATIVES			
AFFILIATION	PHONE NUMBER	PERSON CONTACTED	TIME CONTACTED
Marine Spill Response Corp. (MSRC)	(800) 645-7745		
Onterris (when impacting community for air monitoring)	(866) 869-2834		

MEDICAL			
AFFILIATION	PHONE NUMBER	PERSON CONTACTED	TIME CONTACTED
Hobbs-Lea Regional Medical Center	575-492-5000		
Lubbock University Medical Center (UMC): Level 1 Trauma Center	800-345-9911		
Winkler County Memorial Hospital – Kermit, TX	432-586-5864		
Jal Medical Clinic	575-395-3400		
American Association of Poison Control Centers	800-222-1222		
Lubbock UMC Level 1 Trauma Center – Transfer & MedEvac Services	800-345-9911		

HES CONTACTS				
NAME	TITLE	CELL NUMBER	OFFICE PHONE	TIME CONTACTED
Lo Walp	Safety	575-243-1165		
Benoit LaMarche	Environmental	832-483-9413		
John Ford	Emergency Management	361-278-4656		
Josh Williams	EPG Representative	435-230-1988		
Glenn Godfrey	Security	210-952-4781		
Lori-Ann Malcolm	PSM	409-539-8443		

ROE NOTIFICATIONS (within 100 ppm Radius of Exposure)				
Residences				
NAME	ADDRESS	PHONE	PERSON CONTACTED	TIME CONTACTED
Ralph Ramstetter	193 Anthony Rd Jal, NM 88252	575-706-7973		
Beckham Ranch, Inc.	236 Beckham Rd Jal, NM 88252	575-395-3230		
Businesses				
Ralph Ramstetter	193 Anthony Rd Jal, NM 88252	575-706-7973		
Beckham Ranch, Inc.	236 Beckham Rd Jal, NM 88252	575-395-3230		
Producers				
Ameredev Operating, LLC	2901 Via Fortuna, Suite 600 Austin, TX 78746	737-300-4700		
Caza Operating, LLC	200 N Lorine St, Suite 1550 Midland, TX 79701	432-682-7424		
Salt Creek Midstream, LLC	5775 N. Sam Houston Pkwy W Suite 600 Houston, TX 77086	281-949-8794		
Fulfer Oil & Cattle, LLC	101 E Panther Ave Jal, NM 88252	505-935-9970		
Northern Pacific Oil & Gas Inc.	5825 N Sam Houston Pkwy W Suite 150 Houston, TX 77086	505-738-3809		

REVISION 1
June 2026

3-6

3.4 H2S Emergency Communication

In the event of activation of the Plan at Level 3 for an H2S Emergency, emergency responders, public agencies, local government, and other appropriate public authorities must be contacted. Public awareness and communication are a primary function of this Plan. As such, the company has compiled a list of various public, private, federal, state, and local contacts that are to be notified at various phases during the activation of the Plan. The Level 1, Level 2, and Level 3 Immediate Action Plans and the Response Flow Diagrams, contained in [Section 2](#), indicate when certain entities are to be contacted in the event of activation of this Plan. The company will contact, by telephone, all potentially affected parties as well as state and local response organizations if the H2S element of this Plan is activated. All entities contacted will be advised of the following:

- The nature, location, and extent of the release/emergency at the Facility, Booster Station or Pipeline, and recommendations for protective actions such as evacuation or shelter-in-place orders
- Any other event-specific information that is necessary to protect the public
- Updated status of the release and continued safety measures to be taken, including but not limited to, when to evacuate and/or when it is safe to return to the area

In the event of activation of the Plan, in addition to notifying individuals, businesses, and operators, Company on-site personnel, as designated by the IC, will make a visual inspection of the potentially impacted area to ensure that no individuals are observed inside. If any are observed, they will be advised to immediately evacuate to a designated Emergency Evacuation Area

3.5 Other External Notifications

3.5.1 Media Communication

When required, the Public Information Officer or Incident Commander are the sole authorized spokespersons for the plant. Any requests for information or interviews will be referred to the Public Information Officer to maintain consistency. At the earliest possible opportunity following an incident, a statement will be prepared for the media to acknowledge that an accident, fire or other emergency has occurred and that steps are being taken to control the situation.

If members of the media arrive unexpectedly at the plant (i.e., there is no incident or emergency in progress), the following procedures should be followed:

- Media personnel should be directed to remain at the Main Entrance.
- The Plant Supervisor should then contact the Public Affairs Director or designee.

During all Level 3 events, and potentially Level 2 events depending upon site specific conditions, a media site will be established in a safe area. The IC will also designate an individual to assume the duties of Media Liaison Officer. Under no circumstances will media personnel be allowed inside the warm or hot zone (road blocked area). Media personnel will only be allowed inside the road blocked area once the area has been monitored and restored to a cold zone (i.e., less than 10 ppm H2S) and the IC has approved their entry. Media personnel shall not be allowed to enter the property without the approval of the Plant Manager or his designee and shall be escorted by company personnel at all times.

3.5.2 Next of Kin Notification

The Human Resources Officer will be responsible for coordinating any next of kin notifications. The circumstances and condition of the employee(s) will determine whether the notification is handled by telephone or by a personal visit of a trained Company representative. Transportation may be arranged for the family to the hospital if circumstances warrant.

Titan Gas Treatment Plant Emergency Action Plan

Notification



NOTE: Employee families, relatives and friends should be advised not to flood the plant telephone system with phone calls when the media announces that there has been an emergency involving injuries or the loss of life within the plant. An extreme number of phone calls at the same time will potentially overload and shut down the telephone system.

3.6 Coordination with State Emergency Plans

[NMAC 19.15.11.9.B(2)(E)]

3.6.1 Notifications and Reports

The company has various notification and reporting obligations. Some are related to its state air quality permit that is overseen by NMED as well as state and federal spill reporting obligations. In addition to the regulatory obligations noted above, MPLX personnel also have internal and external notification and reporting obligations associated with the activation of this Plan at Level 3, in which a Potentially Hazardous Volume (PHV) is released. Reporting obligations are as follows:

- New Mexico Oil Conservation Division (NMOCD) [NMAC 19.15.11.16]: As soon as possible, **but no later than four hours** after plan activation, (recognizing that a prompt response should supersede notification), OCD will be notified by the IC or the IC's designee via email or fax to the District I Office of the activation of the H2S Contingency Plan. In the event of a power failure, a phone call will be made within four hours. A full report of the incident to the OCD, utilizing Form C- 141 shall be made no later than 15 days following the release, if greater than 20 MSCFD (see Appendix H).
- New Mexico State Police/ New Mexico Hazardous Materials Emergency Response Plan: The New Mexico State Police will only be notified for a Level 3 plan activation. They have authority to take control of the scene management and coordination of all resources, though limited availability of personnel may inhibit any intervention. Should the State Police assume control, a designated Emergency Response Officer (ERO) will establish the National Interagency Incident Management System (NIIMS) Incident Command System (ICS) as the Incident Commander (IC) and be responsible for management of all response resources on scene. Off-scene coordination of response resources will be handled through designated Headquarters Emergency Response Officers. Law enforcement-related activities will be coordinated by State Police if necessary.

SECTION 4 SPECIFIC RESPONSE ACTIONS

[NMAC 19.15.11.9.B(2)(A)], [API RP-55 7.4A]

4.1 Chemical Information

The Titan Gas Treatment Plant stores and/or processes sour natural gas (containing hydrogen sulfide), amine and condensate. Recovered acid gas (carbon dioxide (CO₂) and hydrogen sulfide (H₂S)) is sequestered in permitted deep wells. **Emergency Response Guidebook Guide #115** (applicable for natural gas), **Guide #117** (hydrogen sulfide), **Guide #120** (carbon dioxide), **Guide #128** (condensate) and **Guide #153** (amines) are provided at the end of this section for information on fires and spills, in addition to what is provided in this EAP.

4.2 Initial Actions

4.2.1 General Procedures

When an emergency is discovered, the first person on scene will initially assume control of the situation until the arrival of a Company employee of higher authority. Upon arrival, the Incident Commander will be responsible to (1) establish on-scene command of the emergency from a location which is upwind of any release and is in a safe area; (2) initiate the Incident Management System (IMS) if necessary; and (3) ensure that the appropriate initial notifications and actions are taken to minimize and control the emergency.

The following general response procedures should be implemented:

- Ensure that all personnel are notified in the immediate area. Isolate the hazard area and deny entry, as appropriate. Establish an initial isolation perimeter and access control points. Keep all non-essential people away from the hazard area.



DANGER: Only those individuals directly involved in the emergency response efforts that are properly trained, wearing the proper level of personal protective clothing, and working in pairs (if feasible for station operators) shall be allowed access into the hazard area.

- Personal protective clothing may include FR clothing, SCBA/supplied air, and/or chemical protective clothing, depending on the nature of the emergency.
- Initiate employee protective actions (e.g., evacuation or protection-in-place), as appropriate.
- If possible, implement immediate control or countermeasures. This includes blocking-in operations, etc., based upon the hazard present. If personal health and safety is not assured, do not attempt to re-enter the emergency site.
- Designate a staging area where the emergency response units can safely report to without becoming directly exposed to the emergency release, as appropriate.
- During accountability, only the Incident Commander shall decide on rescue or recovery for unaccounted personnel
- Identify and confirm the nature of the problem, materials involved, and the extent of the area/unit/process involved.
- Identify the hazards and assess the level of risk to station personnel, the community, and the environment.
- Implement Emergency Notifications, as appropriate.
- Upon the set-up and activation of the Emergency Operations Center (if necessary), overall command of the incident will be transferred to the Incident Commander in the EOC. Advise the Incident

Titan Gas Treatment Plant Emergency Action Plan**Specific Response Actions**

Commander of all emergency actions previously taken or currently being implemented. Command of on-scene operations will remain the responsibility of the On-Scene Commander.

4.2.2 What to do upon discovering an emergency

The initial response to all emergencies should be the same four steps: (A) Evaluation, (B) Protection and Site Control, (C) Reporting, and (D) Situation Control or suppression. These four steps should be done quickly and accurately so that proper information can be reported to emergency responders.

- A. Evaluate the situation.
 - 1. What actions can be taken immediately to stop or minimize the situation?
 - 2. Are people injured or endangered?
 - 3. Is there a potential for the emergency to escalate?
 - 4. What chemicals and equipment are involved?
 - 5. What actions should be taken to secure the site to minimize the danger to others?
 - 6. Can the actions be safely made wearing your current protective equipment?
- B. Protect yourself and others and secure the area of the emergency.
 - 1. Position yourself upwind and warn other workers in the area to remain clear. Use barricade tape (if available) or other means to secure the site until additional help arrives.
- C. Report the emergency.
 - 1. Notify your supervisor or the control room by radio, telephone, in person, or through another person. The Supervisor shall determine the extent of the emergency and if necessary, summon further assistance by activating the Emergency Notification System.
- D. Control or suppress the situation.
 - 1. Only if it is safe to do so, take incipient response actions to control or suppress the emergency (i.e. – use of fire extinguishers). If hazardous gases or other hazards could be present, evacuate the scene until properly trained responders arrive.
 - 2. All employees in the immediate vicinity of the emergency should assist in controlling the situation and/or securing the area until additional assistance arrives. Persons shall position themselves upwind and at a safe distance away from the emergency.
 - 3. If the emergency is a small or incipient fire, an immediate attempt should be made to extinguish the fire by a hand portable fire extinguisher.
 - 4. Employees will receive training in the use of this equipment (as applicable) per timelines required by regulation.

4.3 Responsibility and Duties of Personnel During an Emergency

It is the responsibility of all on-site personnel to follow the safety and emergency procedures outlined within this H2S Contingency Plan, as well as any facility-specific safety plans for the facility. The Company uses the Incident Command System (ICS) for emergency response. The ICS structure used is based on the National Interagency Incident Management System (NIMS) and is consistent with the National Contingency Plan (NCP). All trained company employees, on-site, along the pipeline ROW, at the Compressor Stations, or at the Titan Treating Plant, shall be prepared to respond to an H2S emergency at the Plant as part of the Incident Management Team.

All on-site employees tasked with “response roles” must be fit-tested and H2S certified. Certification must be renewed on an annual basis. In the event that an unplanned release is detected, the first person to discover the issue/release or their designee, by default, will become the on-scene Incident Commander (IC within this Plan) until the responsibility is transferred to appropriate facility personnel. This responsibility should be formally transferred to the Plant Manager as soon as practical. All personnel will be evacuated out of the affected area, and the IC will contact and coordinate with company management if an H2S emergency occurs. Company personnel will immediately respond to

Titan Gas Treatment Plant Emergency Action Plan**Specific Response Actions**

the emergency, as detailed in [Section 2](#) of this plan, and the IC will contact and coordinate with the company's management team.

The Plant Manager/IC or designee shall determine the need for, and implement as necessary:

1. Total Facility Shutdown(s)
2. Isolation of pipelines or pipeline segments
3. Repairs, tests, or restarts as required

If an emergency occurs, the Plant Manager or their designee shall be notified first, and that individual will contact MAPLINE to communicate the emergency to the management team. If any person in this chain of command is unavailable, the individual making the call will elevate the communication to the next level. The intention of this process is to allow the IC to make one phone call and then be able to focus on the incident response.

4.3.1 Site Security

[NMAC 19.15.11.12.b]

In order to have an accurate listing of all personnel on-site in the event of an emergency, a daily sign-in log will be utilized. The sign-in log will include, at a minimum, the name of the individual entering the plant, the company name, time of arrival, and time of departure. All personnel are required to sign in upon arrival and sign-out at time of exit. In compliance with 19.15.11.12.B NMAC, the Plant and AGI wells are contained within a secure fenced area with locking gates.

4.3.2 Discovery and Internal Reporting

All personnel, including contractors who perform operations, maintenance and/or repair work on any part of the treatment facility, including off-site Booster Stations or Pipelines, must wear personal H2S monitoring devices to assist them in detecting the presence of H2S. Fixed H2S monitors are also strategically located within the Titan facility around various process units. Both personal and fixed monitoring devices will provide an audible alarm as detailed in [Section 2](#).

Any personnel discovering a leak or suspected release should immediately notify the Control Room and/or an Operations Representative and vacate the area. Authorized personnel may attempt to resolve the issue if they are safely able to do so and H2S levels remain below 20 ppm. If repairs call for invasive actions (i.e., more than valve manipulation, plug installation, etc.) the individual shall notify the Control Room Operator prior to attempting corrective actions. If necessary, the Control Room Operator will contact the Plant Manager or his designee so that the person can activate the H2S Contingency Plan. Refer to Section 3 for the notification requirements.

If any person detects H2S levels of any concentration, either as a result of an alarm from their personal monitoring device or one of the facility's fixed monitors, they must immediately report this to the Control Room Operator who will contact the Plant Manager for assistance.

If the alarm persists, the responding Operator will don a Self-Contained Breathing Apparatus (SCBA) and notify the Plant Manager or his designee so that the H2S Contingency Plan can be activated, if necessary. Additionally, all non-essential persons shall be notified of the release and evacuated from the area. The responding Operator, wearing the SCBA, will first help any persons requiring assistance during the evacuation prior to attempting to resolve the issue.

Once the Plant Manager/IC is contacted, they or their designee must contact the appropriate company management and Titan Treatment Plant support personnel ([Section 3](#)) and notify them of the existing

Titan Gas Treatment Plant Emergency Action Plan**Specific Response Actions**

situation. Local emergency response providers will also be contacted as deemed necessary by the IC. As necessary, the Control Room Operator will then conduct the notifications of federal and state regulatory agencies including the BLM Field Office in Carlsbad (if applicable), the NMOCD District Office in Hobbs, and emergency response agencies listed in [Section 3](#). Company personnel will instruct any contractor and all others attempting to enter the vicinity of the area that the H2S Contingency Plan has been activated and that they must follow the direction of the IC.

4.4 Location of Nearby Residences, Medical Facilities, Roads, Businesses, Public Receptors, and Producers

4.4.1 Residences and Medical Facilities

There are two (2) residences and no medical facilities located within the 100-ppm Radius of Exposure (ROE) of the Plant. Upon activation of the H2S Contingency Plan (see [Section 2](#) for activation levels), the IC, or designee, shall notify all individuals within the 100-ppm ROE of the nature of the release and status of containment. Depending on the nature of the release and the prevailing wind conditions, individuals will be instructed to shelter in place or evacuate. Contact information for nearby residences can be found in [Section 3](#).

4.4.2 Roads

There are three (3) public roads located within the 100-ppm ROE (Beckham Road, Frying Pan Road, Anthony Road). In the event of activation of this Plan, Titan Gas Treatment Plant personnel will be dispatched to establish roadblocks on these roads to prevent entrance into the ROE, depending on the response level as designated by the IC. Roadblocks will be established at the designated locations regardless of wind direction in anticipation that variations in wind conditions can occur.

Beckham Road will have roadblocks and emergency assembly areas, with alternate escape routes with roadblocks on Frying Pan Road. There are emergency trailers or equivalent vehicles equipped with flashing lights, windsocks and roadblock signs for use in alerting the public of hazardous conditions.

4.4.3 Businesses or Other Public Receptors

There are two businesses within the 100-ppm ROE of the Plant; the location of these can be found in [Figure 2-1](#) and contact information for the two businesses can be found in [Section 3](#).

4.4.4 Producers

There are five producers of active or permitted wells within the 100-ppm ROE for the treatment plant. Contact information for the producers is contained in [Section 3](#).

4.5 Evacuation Procedures

- **Hazard Imposed by Spilled Material** - Several potential hazards are identified and addressed by the company at the Titan Facility. Typical hazards associated with such a treatment plant are fire, related to the flammable material being transported and treated, explosion from compression, and exposure to toxic materials such as sour gas, acid gas, and chemicals used in conjunction with the treatment of sour gas. With such hazards present, company emergency procedures describe what is necessary during an emergency, the characteristics of the toxic chemicals at the plant, potentially impacted areas, and training drills to inform personnel and the public of such hazards:
- **Prevailing Wind Direction and Speed** - The prevailing wind comes from the south during the summer to fall and from the west during winter and spring.
- **Arrival Route of Emergency Response Personnel and Response Equipment** - Emergency Response Personnel and Equipment will arrive via the following route:

Titan Gas Treatment Plant Emergency Action Plan

Specific Response Actions

- From Jal, NM (intersection of 3rd Street and W. Kansas Avenue), drive south on 3rd Street for 1.3 miles. Continue south on Frying Pan Rd for 6.8 miles. After, turn right onto Beckham Rd, continuing for 1.4 miles before turning right. After 0.8 miles, make another right. Last, turn right and follow the road for 0.3 miles before approaching the entrance to the treating facility on the left.
- **Evacuation Route/Muster Point** - Drawings are provided in Section 1 that show in-plant evacuation routes and muster points. *Figure 2-1* shows the locations of Emergency Assembly Areas and recommended evacuation routes for H₂S emergencies.



ATTENTION: Notification of evacuation for all visitors and non-essential personnel shall begin with the 20 ppm H₂S control alarm notification and activation of beacons within the Titan facility. (see Section 2).

- If the alarm persists, or ≥ 20 ppm H₂S is detected, the Responding Operator(s) are to don an SCBA and first determine if any personnel are in distress and assist any distressed personnel to evacuate to Emergency Assembly Area 1. Emergency services (911) will be contacted if there are injuries or as otherwise deemed necessary. Responding operators, wearing the SCBAs, will then investigate the cause of the release.
- At the sound of the evacuation alarm (amber beacons will be illuminated), all other personnel in the Plant are to stop work, check the prevailing wind direction (using visible windsocks) and immediately proceed along designated evacuation routes and/or upwind to the pre-designated Emergency Assembly Areas shown in *Figure 1-2*. Prevailing winds for the area are from the south-southwest.
- Personnel should evacuate along the designated route unless that route is downwind of the release (based on the wind directions observed at the windsocks); in that event all evacuees should proceed along a route that is perpendicular to the release and then upwind to the designated Emergency Assembly Area.
- Roll call shall be conducted at the Emergency Assembly Area to ensure all personnel (including contractors and visitors) are accounted for and have evacuated safely. The sign-in sheet will be used to make a full account of all personnel and visitors. At each Emergency Assembly Area, the ambient air quality will be monitored for H₂S concentration to ensure the area remains at less than 10 ppm. If the H₂S concentration rises to 10 ppm or greater, the assembly area will be relocated as detailed in the immediate action plan section of this document (*see Section 2*).
- After an evacuation, no personnel are to re-enter the Facility until the All Clear / Re-entry signal is given verbally by the Operations Manager. Company personnel may be authorized by the responding agency to re-enter prior to the All Clear to provide site-specific information to the responders.
- Under no circumstances are Company personnel to enter hazardous areas unless they have the proper personal protective equipment and have been trained in the proper use of the equipment and are designated by the IC to enter the hazardous area.
- The **All-Clear** signal will be issued by the Operations Manager after consultation with the appropriate emergency response agencies and Company management and after determining that re-entry is safe.
- **Roadblock Locations** - Pre-planned roadblock locations (to be utilized in the event of a Level 3 response) are shown on the ROE Map (*Figure 2-1*). Each location will have portable road barriers, flashing lights, and warning signs. The IC will designate representatives to staff each of the roadblocks. If deemed necessary by the IC, the State or Local Police will be asked to assist with maintaining the roadblocks and directing traffic through alternate routes outside of the ROE

Titan Gas Treatment Plant Emergency Action Plan

Specific Response Actions

- **Transportation of Injured Personnel to Nearest Emergency Medical Facility** - Injured personnel will be transported to the Jal Medical Clinic in Jal, NM for minor injuries.
- **Emergency Shut Down Systems** [NMAC 19.15.11.12.D(1)]: The Titan Treatment Facility is equipped with an emergency shutdown (ESD) system at the Plant and AGI wells. The ESD system is a fail-safe hardwired system activated by push-button stations placed throughout the Plant ([Figure 1-6](#)). Operators, in consultation with the IC, will determine if an H₂S release situation warrants ESD of the plant. When activated, the ESD system is designed to perform the following actions through the use of a hardwired interface:
 - Close all hydrocarbon inlet and outlet valves to and from the Plant and AGI Wells
 - Initiate a distinct alarm and/or light which is separate from the general plant alarm
 - Shut off fuel for all individual fuel uses
 - Isolate Natural Gas Liquid (NGL) storage tanks and product pumps
 - Shut down all electric motors (with exceptions such as lube oil pumps, flare blowers, instrument air compressors, etc.)
 - Shut down rotating equipment (engine-driven equipment, expander/compressors, pumps, etc.)
 - Isolate fuel to engine-driven equipment
- The locations of the ESD buttons and Isolation Valves are shown in Figure 2. The ESD systems are designed to prevent a Level 2 and/or Level 3 response and can be automated or remotely activated via DCS or SCADA from the control room. Block valves on incoming lines can be remotely closed where they enter the Plant perimeter (see Figure 3). Additional isolating block valves outside the Plant perimeter on the incoming lines can be closed to prevent further gas flow into the Plant. The block valves furthest upstream can isolate the entire system from the field gathering lines coming into the Plant. At the discretion of the IC, operations personnel may be designated to close valves at field locations on inlet gas pipelines to ensure that incoming gas is shut off. Figure 11 shows the map of the sour gas pipeline which will feed the Plant with gas from a gathering system and the three compressor stations. The pipeline will be buried and conforms to all applicable NACE and DOT requirements. To mitigate against a possible Level 2 and/or Level 3 plan response, Operators will take prudent, proactive measures to ESD the plant as necessary. This includes the shutdown of the AGI compressors if necessary. When AGI compressors are shut down either by the automated ESD or at the discretion of the IC, isolation valves upstream and downstream of the units will close as well as those located on the AGI wellhead.



ATTENTION: The Plant ESD can be activated at any time in the Plant Control Room by the Titan Gas Treatment Plant operators and is to be activated if efforts to control the release have failed or if a catastrophic release has occurred.

- **Alarms, Visible Beacons, and Wind Indicators** - Colored beacons, horns, wind direction indicators, and ESD stations are installed at various locations throughout the Plant ([Figure 1-6](#)). At 10 ppm H₂S, all amber beacons within the Plant are illuminated and an audible HMI alarm is initiated within the Control Room notifying the Control Room Operator. The facility-wide audible signal indicating an escalated H₂S emergency response within the plant is a 5 second Euro-Fire Sweep Tone and evacuation messaging stating "Attention! Evacuate to a safe area" that sounds at ≥50 ppm H₂S. Amber beacons remain illuminated throughout the Plant. As per NMAC 19.15.11.12.C, wind direction indicators which are visible both night and day are installed throughout the Plant ([Figure 1-2](#)). At least one wind direction indicator can be seen from any location within the Plant as well as from any point on the perimeter of the Plant.

Titan Gas Treatment Plant Emergency Action Plan

Specific Response Actions

- In addition to the alarms and beacons for an H₂S emergency, the following emergency signals (air horn, siren or whistle) are used in the plant:
 - Alarm Test: Three 1kHz tones / “Your attention please: This is a test. This is a test of the emergency warning system. This is a test and only a test. There are no emergency situations in our area. Thank you.”
 - Fire: Gradual Horn-Steady Horn, Gradually Increasing in Volume / “Attention this is a fire alert, report to your designated area.”
 - General Evacuation: (5 sec) Evac-Amplitude Modulated Siren 479Hz / “Attention! Evacuate to a safe area”
- **Signs and Markers:** The Plant and AGI wells (contained within the Plant boundaries) have readily readable “warning”, “caution” and “notice” signs which conform to the current ANSI standard Z535.1-2002 (Safety Color Code). These signs contain language warnings about the presence of H₂S/Poisonous Gas and high- pressure gas; they are posted at the Plant entrance and around the perimeter of the Plant and where isolation/block valves are located (*Figure 2-1*). The signs are of sufficient size to be readable at a distance of 50 feet and contain the words “Caution Poison Gas”. Emergency response phone numbers are also posted at the entrance to the Plant, and there are signs at the Plant entrance requiring that all visitors sign-in. The company does not have the authority to require individual operators who send gas to the Plant for processing to conform to OCD and/or Department of Transportation (DOT) regulations relative to placement of warning signs at individual wells or on gathering lines. It is the responsibility of these individual operators to conform to appropriate regulations and to certify compliance with those regulations to those regulating agencies, as required. Signs warning of the potential presence of H₂S will be installed where the 100 ppm ROE of the Plant intersect the above referenced public roads.
- **Centralized Check-in/Assembly Area for Evacuation Validation** - Report to Assembly Area and await further instructions.
 - DO NOT pick up personal belongings.
 - DO NOT LEAVE – individuals must be accounted for.
 - DO NOT light a cigarette or smoke or vape. DO NOT remain on the phone or make phone calls.
 - DO NOT attempt to reenter the affected area until supervisor gives the all clear.
 - The Incident Commander (IC) must ensure that all employees are accounted for by taking a head count.
 - The IC must determine if any employees are missing and will report them missing if uncertain of their status.
 - Only the IC and emergency response team is to interface with the local response personnel.
 - The IC will send team members to notify the employees when it is safe to reenter the facility.
- **Selection of Incident Command Post** - The Incident Command Post (ICP) will be established at a designated Zone 2 or Zone 3 Assembly Area as determined by the IC.
- **Reference to Existing Community Evacuation Plans** – all evacuation efforts undertaken at the Plant will be coordinated with the Lea County Local Emergency Planning Committee and/or the New Mexico Emergency Management Council (SERC).
- After returning to the site, a thorough inspection of the Facility must be made to determine:
 - The extent of any damage.
 - The status of all systems and equipment.



- This inspection must cover the entire Facility, even if only a small part of the Facility was affected, in order to make a complete damage assessment.

4.6 Fire or Explosion

4.6.1 Initial Actions

If a fire is discovered, these initial steps shall be followed:

- If it can be done safely, attempt to extinguish an incipient stage fire with the available portable fire extinguishers.
- If the fire was successfully extinguished, report the event.



WARNING: Under no circumstances shall an employee attempt to fight a fire that has passed the incipient stage or beyond their level of training (which can be put out with a fire extinguisher), nor shall any employee attempt to enter a burning building to conduct search and rescue. Untrained individuals may endanger themselves and/or those they are trying to rescue.

4.6.1.1 Uncontrollable Fire



NOTE: The plant is not designed with deluge systems or remote firefighting. Any fire that exceeds that ability to put out with a fire extinguisher will require evacuation, isolation and let burn. The safety of employees and emergency responders is the highest priority.

- Call 911 and activate the emergency evacuation alarm to initiate evacuation
- Implement process operation control, such as activating the ESD's, if safe to do so. ESD's are indicated on *Figure 1-6*.
- If the ESD wasn't successful to mitigate the fire, evacuate the facility and call 911.
- When fire department arrives, have someone meet them at the gate to provide information on the fire, including material on fire and actions taken. Provide support to fire department as requested
- Secure the site and control access to the terminal

4.6.1.2 Vessel Impingement

If the fire is on, near to, or impinging upon pressurized storage vessels containing natural gas liquids (NGL), propane, butane, natural gasoline, or condensate, there is a high risk that a vessel BLEVE may occur within 10-15 minutes. After facility ESD is activated, immediately evacuate to a safe distance as recommended in ERG Guide #115.



WARNING: Zone 1 Assembly Areas are not likely far enough away from pressurized storage if a risk to vessel BLEVE exists. The OSC or Senior Qualified Operations Employee will direct which muster points shall be used.

4.6.1.3 Wildfires

If a wildfire is reported within 10 miles of the station, contact MAPLINE to discuss need and steps to be taken for evacuation and shut down of the facility, if required.

4.7 Response Equipment

4.7.1 Emergency Trailers

Emergency trailers or equivalent emergency vehicles, equipped with flashing lights and windsocks will be utilized at public roads to establish roadblocks (shown in Section 2) to alert the public in the event of hazardous conditions. While local authorities will be notified of any plan activation requiring roadblocks (Level 3), it is the responsibility of the Titan Gas Treatment Plant to maintain and deploy the Emergency Trailers.

Titan Gas Treatment Plant Emergency Action Plan**Specific Response Actions****4.7.2 Gas Detection Equipment**

- Fixed Monitors
 - The Titan Gas Treatment Plant has numerous fixed-point hydrogen sulfide detectors strategically placed throughout the Plant to detect possible leaks. The sensors are connected to the Control Room alarm panel's Programmable Logic Controllers (PLCs), and then to the Distributed Control System (DCS). Upon local detection of hydrogen sulfide at 10 ppm at any detector, visible amber beacons are activated, and a local HMI control room alarm is sounded. Upon detection of hydrogen sulfide at ≥ 50 ppm at any detector, an evacuation alarm is sounded throughout the Plant at which time all personnel will proceed immediately to a designated evacuation area. Amber beacons remain illuminated. Additionally, grouped sensor detection utilizes voting logic to initiate local process shutdowns (PSD) at ≥ 50 PPM.
 - The Plant will monitor the inlet gas stream and sweet gas stream concentrations of hydrogen sulfide via H₂S analyzers installed at various points across the facility, including near the AGI injection pumps.
 - The AGI system monitors can also be viewed on PLC displays located at the Plant and the locations of ambient H₂S sensors are shown on the plot plan (Figure 2). Immediate action is required for any alarm occurrence or malfunction. All H₂S sensors are calibrated monthly.
- Personal and Handheld Gas Monitors: All personnel working at the Plant are required to wear four (4) gas monitors at all times. H₂S setpoints initiate a visual, audible, and a vibration alarm when concentrations of 20 ppm H₂S are detected. Handheld gas detection monitors are available so that personnel can check specific areas and equipment prior to initiating maintenance or other work. The handheld gas detectors, at minimum, have sensors for oxygen, LEL (explosive hydrocarbon atmospheres), H₂S, and carbon dioxide (CO₂).

4.7.3 Respirators

The plant is equipped with six 30-minute SCBA respirators and cascade hose reel systems strategically located throughout the Plant. The cascade hose reel systems have two to four compressed air cylinders hooked up in series to provide a sustained supply of breathing air for extended work time in a hazardous atmosphere. Each cylinder will supply one person with six to eight hours of breathing air at normal workloads or three hours at medium/heavy workloads. Several hose reels and masks may be attached to a cascade system. The system is equipped with a low-pressure alarm to allow workers to safely exit the hazardous area with plenty of reserve air capacity. All Plant personnel are trained and fit tested annually to use the SCBA respirators.

4.7.4 Process Purge System

All vessels, pumps, compression equipment, and piping in the acid gas injection process are designed and equipped to allow purging with pipeline quality gas to remove the acid gas prior to conducting maintenance or inspection work. The purge gas stream with residual acid gas is routed safely into the acid gas flares located at the plant. All flares are equipped with autoignition fuel assist devices in compliance with NMAC 19.15.11.11(D). See [Figure 1-4](#) for location of flares. Operating procedures include the purging of all equipment to avoid acid gas exposure to personnel and to prevent acid gas from escaping to the environment.

4.7.5 Fire Fighting Equipment

The Plant is equipped with portable fire extinguishers that may be used in an emergency, and Plant personnel are trained only for incipient stage firefighting. The fire extinguishers are located throughout the Plant ([Figure 1-6](#)), including process areas, compressor buildings, process buildings, and within company vehicles. The extinguishers present are typically a 30# dry chemical fire extinguisher with the exception of electrical areas.

4.8 Medical Incident

Any injuries resulting in a minor first aid injury must be immediately reported to a Facility Operator or the control room and engage the MPC Health Services representative through MAPLine. Treatment for first aid injuries will take place at Jal Clinic in Jal, NM. A supervisor will transport the injured employee to Jal Clinic for treatment. Jal Clinic is located at 805 W Kansas Ave, Jal, NM (575) 395-3400.

4.8.1 Injury or Medical Emergencies Requiring Paramedic Assistance

Any injury or medical emergency that requires treatment beyond basic first must receive immediate Emergency Medical Service assistance (paramedics). Call 911 and report the injury or medical emergency, location and information about the injured person. Send someone to the main entrance to escort the paramedics to the injured person.

4.8.2 First Aid Equipment

First aid equipment is located in the Plant control room building, Company vehicles, and at other strategic locations throughout the Plant.

**NOTE: The Titan Gas Treatment Plant currently does have an Automatic External Defibrillator (AED) located onsite in the kitchen area of the control building.*

4.8.2 Nearest Hospitals

- The nearest hospital is Winkler County Memorial Hospital located at 821 Jeffee Dr., Kermit, TX 79745, (435) 586-8299. Winkler County Memorial has a heli-pad and, but no burn unit.
- There is one hospital with a burn unit to support the facility:
 - Medical Center Hospital in Odessa, TX.

**NOTE: If an injured person requires decontamination, conduct emergency decon prior to transport in an ambulance to an emergency room.*

4.9 Hazardous Materials Incident (Non-H2S Incident)

4.9.1 Checklist of Spill Response Actions

Hazardous material release containment and control by station personnel is limited to small releases which are within the scope of personnel training and available resources. Large hazardous material releases which are outside the capabilities of the trained facility personnel will be handled by the fire department or other qualified contractors / agencies. Likely hazards to be encountered include petroleum products and hazardous waste.

4.9.2 Initial Response: Hazardous Materials Release

The Initial Responder is responsible for coordinating the following activities when responding to a hazardous materials release:

- Determine if the release can be controlled. Arrive on scene and assess the release from a safe distance. It is imperative the severity of the hazards is understood so the proper safety equipment is supplied, and the appropriate defensive measures are taken. Safety is always the first priority.
 - Obtain the product SDS.
 - Identify the product hazards
 - Estimate the amount of contamination / concentration of the released material.
 - Conduct initial air monitoring if appropriate.
 - Contact the Facility Manager



WARNING: Wear appropriate personal protective equipment when examining the release area. Consult SDS. Stay upwind and outside of spill zone.

4.9.3 Uncontrollable Release

Call 911 to summon the fire department and / or other trained responders if:

Titan Gas Treatment Plant Emergency Action Plan

Specific Response Actions

- Quantities of hazardous material released may impact the safety of personnel or the environment beyond the station boundary.
- If the release cannot be readily controlled, contained and quickly recovered with existing equipment and personnel.
- If a facility evacuation is required.

Initiate Release Control Measures:

- Implement process operation control, such as stopping the material flow to control the release by shutting down pumps and/or compressors, closing valves, lowering tank levels, depressurizing/shutting down equipment, if safe to do so. Eliminate ignition sources.
- Evacuate if necessary; The First Responder will coordinate an evacuation and shut down of process equipment as determined by the incident threat. Determine a safe evacuation route and assembly area and inform personnel onsite.



Note: Evacuate to an area upwind from the release zone (check facility wind sock for wind direction).

- Provide support to the Fire Department** or other responders, including information and resources as necessary.
- Secure the site and control access to the station:** Limit entry to essential personnel only. Obtain help from the Sheriff's Department if necessary. Use caution tape, barricades, barriers etc.
- Make notifications as provided in Section 3.**

4.10 Characteristics of Hydrogen Sulfide, Sulfur Dioxide, Carbon Dioxide

[NMAC 19.15.11.9.B(2)(b)]

4.10.1 Hydrogen Sulfide (H₂S)

H₂S is a colorless, toxic, and flammable gas with the odor of rotten eggs. It is heavier than air and presents a significant health hazard by paralyzing the respiratory system resulting in serious injury or death.

Table 1: Hydrogen Sulfide Properties and Characteristics

Hydrogen Sulfide Properties and Characteristics	
CAS No.	7783-06-4
Molecular Formula	H ₂ S
Molecular Weight	34.082 g/mol
Ceiling Concentration	20 ppm (OSHA)
Ceiling Peak Concentration	50 ppm (OSHA)
Threshold Limit Value (TLV)	15 ppm (ACGIH)
Time Weighted Average (TWA)	10 ppm (NIOSH)
Short Term Exposure Level (STEL)	15 ppm (ACGIH)
Immediately Dangerous to Life or Health (IDLH)	100 ppm
Specific Gravity Relative to Air (Air=1.0)	1.189
Boiling Point	-76.5F
Freezing Point	-121.8F
Vapor Pressure	396 psia
Auto-ignition Temperature	518F
Lower Flammability Limit	4.3%
Upper Flammability Limit	46.0%
Stability	Stable
pH in water	3
Corrosivity	Reacts with metals, plastics, tissues, and nerves

REVISION 1

June 2026

4-11

Titan Gas Treatment Plant Emergency Action Plan

Specific Response Actions

Physical Effects of Hydrogen Sulfide		
Concentration		Physical Effects
ppm	%	
1	0.00010	Can be smelled (rotten egg odor)
10	0.0010	Obvious and unpleasant odor; Permissible exposure level; safe for 8-hour exposure
20	0.0020	Acceptable ceiling concentration
15	.005	Short Term Exposure Limit (STEL); Safe for 15 minutes of exposure without respirator
50	0.0050	Loss of sense of smell in 15 minutes
100	0.0100	Immediately dangerous to life and health (IDLH) loss of sense of smell in 3-15 minutes; stinging in eyes and throat; Altered breathing
200	0.0200	Kills smell rapidly, stinging in eyes and throat
500	0.0500	Dizziness; Unconscious after short exposure; Need artificial respiration
700	0.0700	Unconscious quickly; death will result if not rescued promptly
1000	0.1000	Instant unconsciousness; followed by death within minutes

4.10.2 Sulfur Dioxide (SO₂)

Sulfur Dioxide is a by-product of H₂S combustion. The waste gas stream consisting of H₂S and CO₂ is routed to the plant acid gas flare during abnormal conditions when the acid gas injection equipment is out of service. Waste gas is also routed to the acid gas flare during maintenance operations that require equipment to be blown down.

Sulfur Dioxide is colorless, transparent, and non-flammable gas with a pungent odor associated with burning sulfur. SO₂ is heavier than air but can be picked up by a breeze and carried downwind at elevated temperatures. It can be extremely irritating to the eyes and mucous membranes of the upper respiratory tract.

Table 2: Sulfur Dioxide Properties and Characteristics

Sulfur Dioxide Properties and Characteristics	
CAS No.	7446-09-5
Molecular Formula	SO ₂
Molecular Weight	64.07 g/mol
Permissible Exposure Limit (PEL)	5 ppm (OSHA)
Time Weighted Average (TWA)	2 ppm (ACGIH)
Short Term Exposure Level (STEL)	5 ppm (ACGIH)
Immediately Dangerous to Life and Health (IDLH)	100 ppm
Specific Gravity Relative to Air (Air = 1.0)	2.26
Boiling Point	14°F
Freezing Point	-103.9°F
Vapor Pressure	49.1 psia
Auto-ignition Temperature	N/A
Lower Flammability Limit	N/A
Upper Flammability Limit	N/A
Stability	Stable
Corrosivity	Could form acid rain in aqueous solutions
Physical Effects of Sulfur Dioxide	
Concentration (ppm)	Physical Effects
1	Pungent odor, may cause respiratory changes
2	Permissible exposure limit; Safe for an 8-hour exposure
3-5	Pungent odor; normally a person can detect SO ₂ in this range
5	Short Term Exposure Limit (STEL); Safe for 15 minutes of exposure
12	Throat irritation, coughing, chest constriction, eyes tear and burn
100	Immediately Dangerous to Life and Health (IDLH)
150	Severely irritating; May only be endured for a few minutes
500	Causes a sense of suffocation, even with first breath
1,000	Death may result unless rescued promptly

REVISION 1

June 2026

4-12

Titan Gas Treatment Plant Emergency Action Plan

Specific Response Actions

4.10.3 Carbon Dioxide (CO₂)

Carbon Dioxide is a colorless, odorless, and non-flammable gas that is heavier than air. At concentrations above 10% CO₂ can cause asphyxiation with prolonged exposure.

Table 3: Carbon Dioxide Properties and Characteristics

Carbon Dioxide Properties and Characteristics	
CAS No.	124-38-9
Molecular Formula	CO ₂
Molecular Weight	44.010 g/mol
Time Weighted Average (TWA)	5,000 ppm
Short Term Exposure Level (STEL)	30,000 ppm
Immediately Dangerous to Life and Health (IDLH)	40,000 ppm
Specific Gravity Relative to Air (Air = 1.0)	1.5197
Boiling Point	-109.12°F
Freezing Point	-109.12°F
Vapor Pressure	830 psia
Auto-ignition Temperature	N/A
Lower Flammability Limit	N/A
Upper Flammability Limit	N/A
Stability	Stable
Corrosivity	Dry gas is relatively inert and non-corrosive; can be corrosive to mild steels in aqueous solutions
Physical Effects of Carbon Dioxide	
Concentration (%)	Physical Effects
1.0	Breathing rate increases slightly
2.0	Breathing rate increases to 50% above normal level. Prolonged exposure can cause headache, tiredness
3.0	Breathing rate increases to twice normal rate and becomes labored. Weak narcotic effect. Impaired hearing, headache, increased blood pressure and pulse rate
4.0 - 5.0	Breathing increases to approximately four times normal rate, symptoms of intoxication become evident, and slight choking may be felt
5.0 – 10.0	Characteristic sharp odor noticeable. Very labored breathing, headache, visual impairment, and ringing in the ears. Judgement may be impaired, followed within minutes by loss of consciousness
10.0 -100.0	Unconsciousness occurs more rapidly above 10% level. Prolonged exposure to high concentrations may eventually result in death from asphyxiation

4.11 H₂S Radii of Exposure

[NMAC 19.15.11.7.K]

4.11.1 Worst Case Scenarios

Actual ROE calculations are provided at the end of this section. The basis for worst case scenario calculations are as follows:

- The worst-case ROE for this Plan has been calculated utilizing the inlet and TAG flow rates (24-hour rate) and composition expected for the Plant, which is 200 MMSCFD. The ROE calculation in this Plan utilizes that inlet flow rate and an H₂S concentration for inlet gas of 1.5 mole percent. The calculated ROEs for the inlet gas are shown in the ROE calculations.
- The worst-case scenario ROE assumes an uncontrolled instantaneous release of a 24-hour volume of gas at the Plant. Because the Plant is a throughput process plant, it is impossible that the entire 24-hour throughput volume of the Plant could be released instantaneously as is assumed in the worst-case scenario calculations of the ROE. Further, the Plant's ESD systems would be activated in the

Titan Gas Treatment Plant Emergency Action Plan**Specific Response Actions**

event of a catastrophic emergency and would prevent the flow of gas into the Plant and would isolate the AGI compressors and equipment and route the acid gas safely to the Plant acid gas flare. To comply with NMAC 19.15.11, the worst- case scenario calculations (assuming an instantaneous release of the 24-hour processing and/or TAG volume) are utilized here.

The formulas utilized in calculating the radius of exposure (ROE) are as follows:

- **100 ppm ROE Calculation (as per NMAC 19.15.11.7.K.1):**

$$X = [(1.589)(\text{hydrogen sulfide concentration})(Q)](0.6258)$$

- **500 ppm ROE Calculation (as per NMAC 19.15.11.7.K.1):**

$$X = [(0.4546)(\text{hydrogen sulfide concentration})(Q)](0.6258)$$

Where:

X	= Radius of exposure in feet
hydrogen sulfide concentration	= The decimal equivalent of the mole or volume fraction of hydrogen sulfide in the gaseous mixture
Q	= Escape rate expressed in cubic feet per day (corrected for standard conditions of 14.73 psi absolute and 60 degrees Fahrenheit)

ROE for Titan Gas Treatment Plant worst-case-scenario:

- 100 ppm ROE = 2.86 miles
- 500 ppm ROE = 1.31 miles

The ROE for the Plant and AGI Well are shown in Figure 4. This ROE Pattern is designed to include the 100 ppm and 500 ppm radii for a potential worst-case failure at any point in the system.

4.12 Severe Weather

4.12.1 Downed Power Lines

For any downed powerlines inside the plant area because of severe weather, isolate the area and contact **Oncor Electric 888-313-6862**.

4.12.2 Lightning Storms

Refer to NG/NGL Services Standard Document **SAF-STD-0016 Lightning Safety Standard** for guidelines and requirements for lightning safety.

4.12.3 Tornadoes or Storms with High Winds

Refer to NG/NGL Services Standard Document **SAF-STD-0025-REF-02 Natural Disaster and Severe Weather Response Plan** for guidelines and requirements for tornadoes or severe weather

4.12.4 Earthquake

Earthquakes usually occur without warning therefore the first action is to shelter in place and do not go outdoors. After the earthquake ceases perform the following:

- Assess damage and account for all personnel
- Attend to injured and follow medical response section as required
- Shut off utilities as required
- Implement communications procedures and notify utilities if necessary.

Titan Gas Treatment Plant Emergency Action Plan

Specific Response Actions

4.13 Security

4.13.1 Security Incident Response Guide

SECURITY INCIDENT RESPONSE GUIDE	
Action	Considerations
1. Assess the potential threat.	- What is happening? - Could it get worse? - Corrective action needed? - Additional assistance needed?
2. Perform protective measures based on the type of threat.	See types of security threats and their protective measures below.
If suspicious activity by unknown person is observed in or around facility...	- Do not attempt to make contact with person(s). - Note any information like suspect description, license plate number, etc. - Contact law enforcement.
If workplace violence / active shooter is observed in or around facility...	Run if possible, knowing the location of the attacker. Open facility gate and call law enforcement. Hide and barricade yourself until law enforcement comes. Fight by any means necessary to keep yourself safe.
If bomb threat is received by mail or note...	- Contact law enforcement. - Keep letter/note for law enforcement. See SEC-96028 Bomb Threat and Suspicious Mail for more information.
If bomb threat is received by phone...	- Remain calm. - Keep person on the line. - Listen very carefully. - Ask caller questions listed in SEC-96019 Bomb Threat Procedures. - Contact law enforcement. See SEC-96028 Bomb Threat and Suspicious Mail for more information.
If suspicious package or bomb-like device is found...	- Do not touch or move device. - Evacuate area. - Avoid using radio or cellular phone near the device. - Contact law enforcement. See SEC-96028 Bomb Threat and Suspicious Mail for more information.
If civil disturbance or protest activity near the facility is observed...	- Ensure facility is secured from unauthorized entry. - Brief onsite personnel of situation, evacuation routes, and muster locations. - Ensure camera systems are operational. - Evacuate if necessary and possible. - Shelter-in-place and contact law enforcement if there is a threat of harm to onsite personnel. See the following standards and guidance documents for more information: SEC-6003 Appendix E Emergency Response for Civil Disturbances SEC-96026 Protest and Civil Disturbance MPLX Civil Unrest Guidance Document
3. Cooperate with authorities.	Provide any details and follow up as requested.
4. Call 1-877-MAPLINE (1-877-627-5463) from a safe location if not already done.	Contact the Facility Manager (if not present), Security Professional, and others as needed. See SEC-6003 Appendix C Security Incident Reporting for more information.
5. After event follow up.	- Verify MAPLINE report accurately documents the event and actions taken. - Perform a critique of the incident to identify best practices or areas of improvement. - Complete an incident report.

Titan Gas Treatment Plant Emergency Action Plan**Specific Response Actions**

4.13.1 Site Security

1. Utilize the local Sheriff Department and Highway Patrol to help set up the perimeter.
 - a. Consider traffic patterns and parking needs.
 - b. Secure the area from onlookers, the media, and unauthorized/unnecessary personnel.
2. Cooperate with law enforcement officials.
3. Access should be limited to appropriate company personnel and contractors, approved attorneys, insurance investigators, and adjusters.
 - a. Do not let employees who want to “look at what happened” wander about the site.
 - b. Cooperate with local, county, State, and Federal agency personnel having jurisdiction related to the incident. It is often best (for their safety) to escort them throughout the site.
4. When possible, write down the name, company, and phone number of every person on location at the time of the incident (ICS-211p [Section 5](#)), or request a business card from each individual.
 - a. Information could be helpful during the follow-up investigation.
5. Do not allow removal of any equipment (evidence) that was on site at the time of the incident.
 - a. If an item must be removed due to unusual circumstances do not allow it to be altered or destroyed and know exactly where it is going.
6. Do not allow Trespassers!
 - a. If an unauthorized person refuses to honor the access limitation and enters the secured area, inform them (preferably in front of a witness) that they are trespassing and demand that they leave. If they do not leave immediately, contact the local law enforcement authority, and ask for their help to remove the trespasser

4.14 Other Incidents**4.14.1 Floods**

According to the Flood Insurance Rate Map (#35025C1825D) developed by the Federal Emergency Management Agency, the Facility is located in an area that has a minimal flood risk. If there is a flood in the facility as a result of storms or broken water mains, the facility manager will assess the situation and make a determination to halt truck traffic, depending on whether an increased hazard is present from the flood water.

4.14.2 Rescue

If a situation occurs that involves rescue, such as from a confined space, trench or high elevation (tank roof), immediately call 911 and request assistance.

**GUIDE
115****GASES - FLAMMABLE
(INCLUDING REFRIGERATED LIQUIDS)****POTENTIAL HAZARDS****FIRE OR EXPLOSION**

- **EXTREMELY FLAMMABLE.**

- Will be easily ignited by heat, sparks or flames.
- Will form explosive mixtures with air.
- Vapors from liquefied gas are initially heavier than air and spread along ground.

CAUTION: Hydrogen (UN1049), Deuterium (UN1957), Hydrogen, refrigerated liquid (UN1966), Methane (UN1971) and Hydrogen and Methane mixture, compressed (UN2034) are lighter than air and will rise. Hydrogen and Deuterium fires are difficult to detect since they burn with an invisible flame. Use an alternate method of detection (thermal camera, broom handle, etc.)

- Vapors may travel to source of ignition and flash back.
- Cylinders exposed to fire may vent and release flammable gas through pressure relief devices.
- Containers may explode when heated.
- Ruptured cylinders may rocket.

CAUTION: When LNG – Liquefied natural gas (UN1972) is released on or near water, product may vaporize explosively.

HEALTH

- Vapors may cause dizziness or asphyxiation without warning, especially when in closed or confined areas.
- Some may be irritating if inhaled at high concentrations.
- Contact with gas, liquefied gas or cryogenic liquids may cause burns, severe injury and/or frostbite.
- Fire may produce irritating and/or toxic gases.

PUBLIC SAFETY

- **CALL 911. Then call emergency response telephone number on shipping paper.** If shipping paper not available or no answer, refer to appropriate telephone number listed on the inside back cover.
- Keep unauthorized personnel away.
- Stay upwind, uphill and/or upstream.
- Many gases are heavier than air and will spread along the ground and collect in low or confined areas (sewers, basements, tanks, etc.).

PROTECTIVE CLOTHING

- Wear positive pressure self-contained breathing apparatus (SCBA).
- Structural firefighters' protective clothing provides thermal protection **but only limited chemical protection.**
- Always wear thermal protective clothing when handling refrigerated/cryogenic liquids.

EVACUATION**Immediate precautionary measure**

- Isolate spill or leak area for at least 100 meters (330 feet) in all directions.

Large Spill

- Consider initial downwind evacuation for at least 800 meters (1/2 mile).

Fire

- If tank, rail tank car or highway tank is involved in a fire, ISOLATE for 1600 meters (1 mile) in all directions; also, consider initial evacuation for 1600 meters (1 mile) in all directions.
- In fires involving Liquefied Petroleum Gases (LPG) (UN1075), Butane (UN1011), Butylene (UN1012), Isobutylene (UN1055), Propylene (UN1077), Isobutane (UN1969), and Propane (UN1978), also refer to the "BLEVE – Safety Precautions" section.

**GASES - FLAMMABLE
(INCLUDING REFRIGERATED LIQUIDS)****GUIDE
115****EMERGENCY RESPONSE****FIRE**

- **DO NOT EXTINGUISH A LEAKING GAS FIRE UNLESS LEAK CAN BE STOPPED.**

CAUTION: Hydrogen (UN1049), Deuterium (UN1957), Hydrogen, refrigerated liquid (UN1966) and Hydrogen and Methane mixture, compressed (UN2034) will burn with an invisible flame. Use an alternate method of detection (thermal camera, broom handle, etc.)

Small Fire

- Dry chemical or CO₂.

Large Fire

- Water spray or fog.
- If it can be done safely, move undamaged containers away from the area around the fire.

CAUTION: For **LNG - Liquefied natural gas (UN1972)** pool fires, **DO NOT USE** water. Use dry chemical or high-expansion foam.

Fire Involving Tanks

- Fight fire from maximum distance or use unmanned master stream devices or monitor nozzles.
- Cool containers with flooding quantities of water until well after fire is out.
- Do not direct water at source of leak or safety devices; icing may occur.
- Withdraw immediately in case of rising sound from venting safety devices or discoloration of tank.
- ALWAYS stay away from tanks in direct contact with flames.
- For massive fire, use unmanned master stream devices or monitor nozzles; if this is impossible, withdraw from area and let fire burn.

SPILL OR LEAK

- **ELIMINATE** all ignition sources (no smoking, flares, sparks or flames) from immediate area.
- All equipment used when handling the product must be grounded.
- Do not touch or walk through spilled material.
- Stop leak if you can do it without risk.
- If possible, turn leaking containers so that gas escapes rather than liquid.
- Use water spray to reduce vapors or divert vapor cloud drift. Avoid allowing water runoff to contact spilled material.
- Do not direct water at spill or source of leak.

CAUTION: For **LNG - Liquefied natural gas (UN1972)**, **DO NOT** apply water, regular or alcohol-resistant foam directly on spill. Use a high-expansion foam if available to reduce vapors.

- Prevent spreading of vapors through sewers, ventilation systems and confined areas.
- Isolate area until gas has dispersed.

CAUTION: When in contact with refrigerated/cryogenic liquids, many materials become brittle and are likely to break without warning.

FIRST AID

Refer to the "General First Aid" section.

Specific First Aid:

- Clothing frozen to the skin should be thawed before being removed.
- In case of contact with liquefied gas, only medical personnel should attempt thawing frosted parts.
- In case of burns, immediately cool affected skin for as long as possible with cold water. Do not remove clothing if adhering to skin.



In Canada, an Emergency Response Assistance Plan (ERAP) may be required for this product. Please consult the shipping paper and/or the "ERAP" section.

BLEVE AND HEAT INDUCED TEAR**BLEVE (BOILING LIQUID EXPANDING VAPOR EXPLOSION)**

The following section presents important safety-related information on BLEVEs, including a table, to consider in a situation involving Liquefied Petroleum Gases (LPG), UN1075.

LPGs include the following flammable gases:

- UN1011 - Butane
- UN1012 - Butylene
- UN1055 - Isobutylene
- UN1077 - Propylene
- UN1969 - Isobutane
- UN1978 - Propane

A BLEVE occurs when a fire impinged or damaged tank car fails to contain its internal pressure and explodes with a sudden product release. This catastrophic failure is more likely to occur with damaged pressure tank cars, even in the absence of an active fire.

The **main hazards** from a LPG BLEVE are:

- Fire: If the released substance is ignited, there is an immediate fireball.
- Thermal radiation: At a distance of about 4 times the radius of a fireball, the heat radiated from a fireball is enough to burn exposed skin in 2 seconds. Wearing protective clothing limits the thermal radiation dose.
- Blast: A concussive force caused by the sudden release of the pressurized substance. For a BLEVE occurring out in the open, the blast strength at a distance of 4 times the radius of a fireball can break window glass and may cause minor damage to buildings.
- Projectiles: Tank failure can throw metal fragments over large distances. These fragments can and have been deadly.

The danger decreases as you move away from the BLEVE centre. The furthest-reaching hazard is projectiles.

For a video with information on critical safety issues concerning BLEVEs, please visit <https://www.tc.gc.ca/eng/tdg/publications-menu-1238.html>.

HEAT INDUCED TEAR (HIT)

A heat induced tear (HIT) is a rupture of a NON-PRESSURE tank car containing flammable liquids when exposed to the intense heat of a fire. The metal will soften and the pressure in the tank car will increase which can lead to containment failure. The tear generally occurs at the vapor space (upper side) of the container, venting large quantities of flammable liquid and vapors at high speed. A fireball and an intense heat wave will occur.

Compared to BLEVEs, HITs rarely result in the projection of tank car fragments. Heat induced tearing has occurred within 20 minutes of the derailment and as long as 10+ hours following the initial fire.

Responding to these types of incidents (BLEVE and HIT) requires specialized training, equipment and a tactical approach.

BLEVE – SAFETY PRECAUTIONS

Use with caution. The following table gives a summary of tank properties, critical times, critical distances and cooling water flow rates for various tank sizes. This table is provided to give responders some guidance but it should be used with caution.

Tank dimensions are approximate and can vary depending on the tank design and application.

Minimum time to failure is based on **severe torch fire impingement** on the vapor space of a tank in good condition, and is approximate. Tanks may fail earlier if they are damaged or corroded. Tanks may fail minutes or hours later than these minimum times depending on the conditions. It has been assumed here that the tanks are not equipped with thermal barriers or water spray cooling.

Minimum time to empty is based on an engulfing fire with a properly sized pressure relief valve. If the tank is only partially engulfed, then time to empty will increase (i.e., if tank is 50% engulfed, then the tanks will take twice as long to empty). Once again, it has been assumed that the tank is not equipped with a thermal barrier or water spray.

Tanks equipped with thermal barriers or water spray cooling significantly increase the times to failure and the times to empty. A thermal barrier can reduce the heat input to a tank by a factor of ten or more. This means it could take ten times as long to empty the tank through the Pressure Relief Valve (PRV).

Fireball radius and emergency response distance is based on mathematical equations and is approximate. They assume spherical fireballs and this is not always the case.

Two safety distances for public evacuation. The minimum distance is based on tanks that are launched with a small elevation angle (i.e., a few degrees above horizontal). This is most common for horizontal cylinders. The preferred evacuation distance has more margin of safety since it assumes the tanks are launched at a 45 degree angle to the horizontal. This might be more appropriate if a vertical cylinder is involved.

It is understood that these distances are very large and may not be practical in a highly populated area. However, it should be understood that the risks increase rapidly the closer you are to a BLEVE. Keep in mind that the furthest reaching projectiles tend to come off in the zones 45 degrees on each side of the tank ends.

Water flow rate is based on $5(\sqrt{\text{capacity (USgal)}}) = \text{USgal/min}$ needed to cool tank metal.

Warning: the data given are approximate and should only be used with extreme caution. For example, where times are given for tank failure or tank emptying through the pressure relief valve – these times are typical but they can vary from situation to situation. Therefore, never risk life based on these times.

GUIDE 117

GASES - TOXIC - FLAMMABLE (EXTREME HAZARD)

POTENTIAL HAZARDS

HEALTH

- **TOXIC; Extremely Hazardous.**
- May be fatal if inhaled or absorbed through skin.
- Initial odor may be irritating or foul and may deaden your sense of smell.
- Contact with gas or liquefied gas may cause burns, severe injury and/or frostbite.
- Fire will produce irritating, corrosive and/or toxic gases.
- Runoff from fire control or dilution water may cause environmental contamination.

FIRE OR EXPLOSION

- These materials are extremely flammable.
- May form explosive mixtures with air.
- May be ignited by heat, sparks or flames.
- Vapors from liquefied gas are initially heavier than air and spread along ground.
- Vapors may travel to source of ignition and flash back.
- Those substances designated with a **(P)** may polymerize explosively when heated or involved in a fire.
- Runoff may create fire or explosion hazard.
- Cylinders exposed to fire may vent and release toxic and flammable gas through pressure relief devices.
- Containers may explode when heated.
- Ruptured cylinders may rocket.

PUBLIC SAFETY

- **CALL 911. Then call emergency response telephone number on shipping paper.** If shipping paper not available or no answer, refer to appropriate telephone number listed on the inside back cover.
- Keep unauthorized personnel away.
- Stay upwind, uphill and/or upstream.
- Many gases are heavier than air and will spread along the ground and collect in low or confined areas (sewers, basements, tanks, etc.).
- Ventilate closed spaces before entering, but only if properly trained and equipped.

PROTECTIVE CLOTHING

- Wear positive pressure self-contained breathing apparatus (SCBA).
- Wear chemical protective clothing that is specifically recommended by the manufacturer **when there is NO RISK OF FIRE.**
- Structural firefighters' protective clothing provides thermal protection **but only limited chemical protection.**

EVACUATION

Immediate precautionary measure

- Isolate spill or leak area for at least 100 meters (330 feet) in all directions.

Spill

- See **Table 1 - Initial Isolation and Protective Action Distances.**

Fire

- If tank, rail tank car or highway tank is involved in a fire, ISOLATE for 1600 meters (1 mile) in all directions; also, consider initial evacuation for 1600 meters (1 mile) in all directions.

**GASES - TOXIC - FLAMMABLE
(EXTREME HAZARD)****GUIDE
117****EMERGENCY RESPONSE****FIRE**

- **DO NOT EXTINGUISH A LEAKING GAS FIRE UNLESS LEAK CAN BE STOPPED.**

Small Fire

- Dry chemical, CO₂, water spray or regular foam.

Large Fire

- Water spray, fog or regular foam.
- If it can be done safely, move undamaged containers away from the area around the fire.
- Damaged cylinders should be handled only by specialists.

Fire Involving Tanks

- Fight fire from maximum distance or use unmanned master stream devices or monitor nozzles.
- Cool containers with flooding quantities of water until well after fire is out.
- Do not direct water at source of leak or safety devices; icing may occur.
- Withdraw immediately in case of rising sound from venting safety devices or discoloration of tank.
- ALWAYS stay away from tanks in direct contact with flames.

SPILL OR LEAK

- ELIMINATE all ignition sources (no smoking, flares, sparks or flames) from immediate area.
- All equipment used when handling the product must be grounded.
- Do not touch or walk through spilled material.
- Stop leak if you can do it without risk.
- Use water spray to reduce vapors or divert vapor cloud drift. Avoid allowing water runoff to contact spilled material.
- Do not direct water at spill or source of leak.
- If possible, turn leaking containers so that gas escapes rather than liquid.
- Prevent entry into waterways, sewers, basements or confined areas.
- Isolate area until gas has dispersed.
- Consider igniting spill or leak to eliminate toxic gas concerns.

FIRST AID

Refer to the "General First Aid" section.

Specific First Aid:

- In case of contact with liquefied gas, only medical personnel should attempt thawing frosted parts.
- In case of burns, immediately cool affected skin for as long as possible with cold water. Do not remove clothing if adhering to skin.



In Canada, an Emergency Response Assistance Plan (ERAP) may be required for this product. Please consult the shipping paper and/or the "ERAP" section.

**GUIDE
120****GASES - INERT
(INCLUDING REFRIGERATED LIQUIDS)****POTENTIAL HAZARDS****HEALTH**

- Vapors may cause dizziness or asphyxiation without warning, especially when in closed or confined areas.
- Vapors from liquefied gas are initially heavier than air and spread along ground.
- Contact with gas, liquefied gas or cryogenic liquids may cause burns, severe injury and/or frostbite.

FIRE OR EXPLOSION

- **Non-flammable gases.**
- Containers may explode when heated.
- Ruptured cylinders may rocket.

PUBLIC SAFETY

- **CALL 911. Then call emergency response telephone number on shipping paper.** If shipping paper not available or no answer, refer to appropriate telephone number listed on the inside back cover.
- Keep unauthorized personnel away.
- Stay upwind, uphill and/or upstream.
- Many gases are heavier than air and will spread along the ground and collect in low or confined areas (sewers, basements, tanks, etc.).
- Ventilate closed spaces before entering, but only if properly trained and equipped.

PROTECTIVE CLOTHING

- Wear positive pressure self-contained breathing apparatus (SCBA).
- Structural firefighters' protective clothing provides thermal protection **but only limited chemical protection.**
- Always wear thermal protective clothing when handling refrigerated/cryogenic liquids or solids.

EVACUATION**Immediate precautionary measure**

- Isolate spill or leak area for at least 100 meters (330 feet) in all directions.

Large Spill

- Consider initial downwind evacuation for at least 100 meters (330 feet).

Fire

- If tank, rail tank car or highway tank is involved in a fire, ISOLATE for 800 meters (1/2 mile) in all directions; also, consider initial evacuation for 800 meters (1/2 mile) in all directions.

**GASES - INERT
(INCLUDING REFRIGERATED LIQUIDS)****GUIDE
120****EMERGENCY RESPONSE****FIRE**

- Use extinguishing agent suitable for type of surrounding fire.
- If it can be done safely, move undamaged containers away from the area around the fire.
- Damaged cylinders should be handled only by specialists.

Fire Involving Tanks

- Fight fire from maximum distance or use unmanned master stream devices or monitor nozzles.
- Cool containers with flooding quantities of water until well after fire is out.
- Do not direct water at source of leak or safety devices; icing may occur.
- Withdraw immediately in case of rising sound from venting safety devices or discoloration of tank.
- ALWAYS stay away from tanks in direct contact with flames.

SPILL OR LEAK

- Do not touch or walk through spilled material.
- Stop leak if you can do it without risk.
- Use water spray to reduce vapors or divert vapor cloud drift. Avoid allowing water runoff to contact spilled material.
- Do not direct water at spill or source of leak.
- If possible, turn leaking containers so that gas escapes rather than liquid.
- Prevent entry into waterways, sewers, basements or confined areas.
- Allow substance to evaporate.
- Ventilate the area.

CAUTION: When in contact with refrigerated/cryogenic liquids, many materials become brittle and are likely to break without warning.

FIRST AID

Refer to the "General First Aid" section.

Specific First Aid:

- Clothing frozen to the skin should be thawed before being removed.
- In case of contact with liquefied gas, only medical personnel should attempt thawing frosted parts.

GUIDE 128

FLAMMABLE LIQUIDS (WATER-IMMISCIBLE)

POTENTIAL HAZARDS

FIRE OR EXPLOSION

- **HIGHLY FLAMMABLE:** Will be easily ignited by heat, sparks or flames.
- Vapors may form explosive mixtures with air.
- Vapors may travel to source of ignition and flash back.
- Most vapors are heavier than air. They will spread along the ground and collect in low or confined areas (sewers, basements, tanks, etc.).
- Vapor explosion hazard indoors, outdoors or in sewers.
- Those substances designated with a (P) may polymerize explosively when heated or involved in a fire.
- Runoff to sewer may create fire or explosion hazard.
- Containers may explode when heated.
- Many liquids will float on water.
- Substance may be transported hot.
- For hybrid vehicles, GUIDE 147 (lithium ion or sodium ion batteries) or GUIDE 138 (sodium batteries) should also be consulted.
- **If molten aluminum is involved, refer to GUIDE 169.**

HEALTH

CAUTION: Petroleum crude oil (UN1267) may contain **TOXIC** hydrogen sulphide gas.

- Inhalation or contact with material may irritate or burn skin and eyes.
- Fire may produce irritating, corrosive and/or toxic gases.
- Vapors may cause dizziness or asphyxiation, especially when in closed or confined areas.
- Runoff from fire control or dilution water may cause environmental contamination.

PUBLIC SAFETY

- **CALL 911. Then call emergency response telephone number on shipping paper.** If shipping paper not available or no answer, refer to appropriate telephone number listed on the inside back cover.
- Keep unauthorized personnel away.
- Stay upwind, uphill and/or upstream.
- Ventilate closed spaces before entering, but only if properly trained and equipped.

PROTECTIVE CLOTHING

- Wear positive pressure self-contained breathing apparatus (SCBA).
- Structural firefighters' protective clothing provides thermal protection **but only limited chemical protection.**

EVACUATION

Immediate precautionary measure

- Isolate spill or leak area for at least 50 meters (150 feet) in all directions.

Large Spill

- Consider initial downwind evacuation for at least 300 meters (1000 feet).

Fire

- If tank, rail tank car or highway tank is involved in a fire, ISOLATE for 800 meters (1/2 mile) in all directions; also, consider initial evacuation for 800 meters (1/2 mile) in all directions.

**FLAMMABLE LIQUIDS
(WATER-IMMISCIBLE)****GUIDE
128****EMERGENCY RESPONSE****FIRE**

CAUTION: The majority of these products have a very low flash point. Use of water spray when fighting fire may be inefficient.

CAUTION: For mixtures containing alcohol or polar solvent, alcohol-resistant foam may be more effective.

Small Fire

- Dry chemical, CO₂, water spray or regular foam. If regular foam is ineffective or unavailable, use alcohol-resistant foam.

Large Fire

- Water spray, fog or regular foam. If regular foam is ineffective or unavailable, use alcohol-resistant foam.
- Avoid aiming straight or solid streams directly onto the product.
- If it can be done safely, move undamaged containers away from the area around the fire.

Fire Involving Tanks, Rail Tank Cars or Highway Tanks

- Fight fire from maximum distance or use unmanned master stream devices or monitor nozzles.
- Cool containers with flooding quantities of water until well after fire is out.
- For petroleum crude oil, do not spray water directly into a breached tank car. This can lead to a dangerous boil over.
- Withdraw immediately in case of rising sound from venting safety devices or discoloration of tank.
- ALWAYS stay away from tanks in direct contact with flames.
- For massive fire, use unmanned master stream devices or monitor nozzles; if this is impossible, withdraw from area and let fire burn.

SPILL OR LEAK

- ELIMINATE all ignition sources (no smoking, flares, sparks or flames) from immediate area.
- All equipment used when handling the product must be grounded.
- Do not touch or walk through spilled material.
- Stop leak if you can do it without risk.
- Prevent entry into waterways, sewers, basements or confined areas.
- A vapor-suppressing foam may be used to reduce vapors.
- Absorb or cover with dry earth, sand or other non-combustible material and transfer to containers.
- Use clean, non-sparking tools to collect absorbed material.

Large Spill

- Dike far ahead of liquid spill for later disposal.
- Water spray may reduce vapor, but may not prevent ignition in closed spaces.

FIRST AID

Refer to the "General First Aid" section.

Specific First Aid:

- Wash skin with soap and water.
- In case of burns, immediately cool affected skin for as long as possible with cold water. Do not remove clothing if adhering to skin.



In Canada, an Emergency Response Assistance Plan (ERAP) may be required for this product. Please consult the shipping paper and/or the "ERAP" section.

GUIDE 153 SUBSTANCES - TOXIC AND/OR CORROSIVE (COMBUSTIBLE)

POTENTIAL HAZARDS

HEALTH

- **TOXIC and/or CORROSIVE**; inhalation, ingestion or skin contact with material may cause severe injury or death.
- Methyl bromoacetate (UN2643) is an eye irritant/lachrymator (causes flow of tears).
- Contact with molten substance may cause severe burns to skin and eyes.
- Avoid any skin contact.
- Fire may produce irritating, corrosive and/or toxic gases.
- Runoff from fire control or dilution water may be corrosive and/or toxic and cause environmental contamination.

FIRE OR EXPLOSION

- Combustible material: may burn but does not ignite readily.
- When heated, vapors may form explosive mixtures with air: indoors, outdoors and sewers explosion hazards.
- Those substances designated with a (P) may polymerize explosively when heated or involved in a fire.
- Corrosives in contact with metals may evolve flammable hydrogen gas.
- Containers may explode when heated.
- Runoff may pollute waterways.
- Substance may be transported in a molten form.

PUBLIC SAFETY

- **CALL 911. Then call emergency response telephone number on shipping paper.** If shipping paper not available or no answer, refer to appropriate telephone number listed on the inside back cover.
- Keep unauthorized personnel away.
- Stay upwind, uphill and/or upstream.
- Ventilate closed spaces before entering, but only if properly trained and equipped.

PROTECTIVE CLOTHING

- Wear positive pressure self-contained breathing apparatus (SCBA).
- Wear chemical protective clothing that is specifically recommended by the manufacturer **when there is NO RISK OF FIRE.**
- Structural firefighters' protective clothing provides thermal protection **but only limited chemical protection.**

EVACUATION

Immediate precautionary measure

- Isolate spill or leak area in all directions for at least 50 meters (150 feet) for liquids and at least 25 meters (75 feet) for solids.

Spill

- For **highlighted materials**: see Table 1 - Initial Isolation and Protective Action Distances.
- For non-highlighted materials: increase the immediate precautionary measure distance, in the downwind direction, as necessary.

Fire

- If tank, rail tank car or highway tank is involved in a fire, ISOLATE for 800 meters (1/2 mile) in all directions; also, consider initial evacuation for 800 meters (1/2 mile) in all directions.

**SUBSTANCES - TOXIC AND/OR CORROSIVE
(COMBUSTIBLE)****GUIDE
153****EMERGENCY RESPONSE****FIRE****Small Fire**

- Dry chemical, CO₂ or water spray.

Large Fire

- Dry chemical, CO₂, alcohol-resistant foam or water spray.
- If it can be done safely, move undamaged containers away from the area around the fire.
- Dike runoff from fire control for later disposal.

Fire Involving Tanks, Rail Tank Cars or Highway Tanks

- Fight fire from maximum distance or use unmanned master stream devices or monitor nozzles.
- Do not get water inside containers.
- Cool containers with flooding quantities of water until well after fire is out.
- Withdraw immediately in case of rising sound from venting safety devices or discoloration of tank.
- ALWAYS stay away from tanks in direct contact with flames.

SPILL OR LEAK

- ELIMINATE all ignition sources (no smoking, flares, sparks or flames) from immediate area.
- Do not touch damaged containers or spilled material unless wearing appropriate protective clothing.
- Stop leak if you can do it without risk.
- Prevent entry into waterways, sewers, basements or confined areas.
- Absorb or cover with dry earth, sand or other non-combustible material and transfer to containers.
- DO NOT GET WATER INSIDE CONTAINERS.

FIRST AID

Refer to the "General First Aid" section.

Specific First Aid:

- For corrosives, in case of contact, immediately flush skin or eyes with running water for at least 30 minutes. Additional flushing may be required.
- Removal of solidified molten material from skin requires medical assistance.



In Canada, an Emergency Response Assistance Plan (ERAP) may be required for this product. Please consult the shipping paper and/or the "ERAP" section.

Radius of Exposure CalculationLocation:

ROE CALCULATIONS PURSUANT TO RULE 11

If data is provided in mole %, use calculator below for getting ppm

Enter Mole %	1.5	ppm Calculation	15,000
--------------	-----	-----------------	--------

If data is provided in mole fraction, use calculator below for getting ppm

Enter Mole Fraction	0.015	ppm Calculation	15,000
---------------------	-------	-----------------	--------

If data is provided in ppm, use calculator below for getting mole fraction for calculations

ppm	15,000	mole fraction	0.015000
-----	--------	---------------	----------

Use ppm derived from either of above calculations to input data below

H2S Concentration (ppm)	15,000
24 Hour Throughput (MMSCFD)	200

The radius of exposure is calculated using the following equations:

100 ppm ROE calculation (as per 19 NMAC 15.11.7.K.1)	$X_{100\text{ppm}} = [(1.589)(\text{Conc}_{\text{H}_2\text{S}})(Q)]^{(0.6258)}$
--	---

200 ppm ROE calculation (as per 19 NMAC 15.11.7.K.1)	$X_{500\text{ppm}} = [(0.4546)(\text{Conc}_{\text{H}_2\text{S}})(Q)]^{(0.6258)}$
--	--

Where:

X = radius of exposure (ft)

 $\text{Conc}_{\text{H}_2\text{S}}$ = the decimal equivalent of the mole or volume fraction of H2S in the gas

Q = daily plant throughput corrected to standard conditions (SCFD)

Plant Parameters

Q =	200	MMSCFD	200,000,000	SCFD
$\text{Conc}_{\text{H}_2\text{S}}$ =	15,000	ppm		

ROE Calculations

	Constant		$\text{Conc}_{\text{H}_2\text{S}}$		SCFD		Factor
$X_{100\text{ppm}}$	1.589		0.015		200,000,000		0.6258
	15,109.35	feet			2.86	miles	
$X_{500\text{ppm}}$	0.4546		0.015		200,000,000		0.6258
	6,904.42	feet			1.31	miles	

THIS PAGE INTENTIONALLY LEFT BLANK

SECTION 5 FORMS

The forms in this chapter are standard forms, which are consistent with those used by municipal response organizations as well as most mutual aid organizations.

These forms or their approved equivalents should be filled out by Company Representatives and serve as documentation of the actions taken and plans for ongoing mitigation/control.

The following chapter is setup so that the actual form is accompanied by the instructions for filling out that particular form.

ICS 201 Incident Briefing

ICS 211p Personal Check-in

Bomb Threat Checklist

New Mexico Oil Conservation Division Form C-141

THIS PAGE INTENTIONALLY LEFT BLANK

1. Incident Name		2. Prepared by (Name) Date: _____ Time: _____		INCIDENT BRIEFING ICS 201	
1. Map / Sketch (Include maps drawn here or attached, showing the total area of operations, the incident site/area, overflight results, trajectories, impacted shorelines, or other graphics depicting situational and response status)					
Wind Speed/Dir: ____ / ____ Air Temp: ____ Wind Chill: ____ Precipitation: ____ Ceiling: ____ Visibility: ____ Sunrise/Sunset: ____ / ____					
INCIDENT BRIEFING				ICS 201 Page 1	

☐	Ensure safety of the public and responder personnel
☐	Control the Source of the Spill
☐	Maximize Protection of Environmentally-Sensitive Areas
☐	Contain and recover spilled material
☐	

[illegible]

ICS 201
Page 2

6. Current Organization

Unified Command		FOSC																																																																					
		SOSC																																																																					
		IC																																																																					
		LOSC																																																																					
		TOSC																																																																					
		Safety Officer																																																																					
		Liaison Officer																																																																					
		Information Officer																																																																					
Operations Section	Planning Section	Logistics Section	Finance/Admin. Section																																																																				
Div. / Group Div. / Group Div. / Group Div. / Group Div. / Group	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="4" style="text-align: center;">Communications Table</th> </tr> <tr> <th style="width: 25%;">Position</th> <th style="width: 25%;">Phone #/Radio</th> <th style="width: 25%;">Position</th> <th style="width: 25%;">Phone #/Radio</th> </tr> </thead> <tbody> <tr><td>FOSC</td><td></td><td>Ops Sect Chief</td><td></td></tr> <tr><td>SOSC</td><td></td><td>Div/Group Sup</td><td></td></tr> <tr><td>IC</td><td></td><td>Div/Group Sup</td><td></td></tr> <tr><td>LOSC</td><td></td><td>Div/Group Sup</td><td></td></tr> <tr><td>TOSC</td><td></td><td>Div/Group Sup</td><td></td></tr> <tr><td>Safety Officer</td><td></td><td>Div/Group Sup</td><td></td></tr> <tr><td>Liaison Officer</td><td></td><td>Plan Sect Chief</td><td></td></tr> <tr><td>PIO</td><td></td><td>Logs Sect Chief</td><td></td></tr> <tr><td></td><td></td><td>Fin Sect Chief</td><td></td></tr> <tr><td></td><td></td><td></td><td></td></tr> <tr><td></td><td></td><td></td><td></td></tr> <tr><td></td><td></td><td></td><td></td></tr> <tr><td></td><td></td><td></td><td></td></tr> <tr><td></td><td></td><td></td><td></td></tr> <tr><td></td><td></td><td></td><td></td></tr> </tbody> </table>			Communications Table				Position	Phone #/Radio	Position	Phone #/Radio	FOSC		Ops Sect Chief		SOSC		Div/Group Sup		IC		Div/Group Sup		LOSC		Div/Group Sup		TOSC		Div/Group Sup		Safety Officer		Div/Group Sup		Liaison Officer		Plan Sect Chief		PIO		Logs Sect Chief				Fin Sect Chief																									
Communications Table																																																																							
Position	Phone #/Radio	Position	Phone #/Radio																																																																				
FOSC		Ops Sect Chief																																																																					
SOSC		Div/Group Sup																																																																					
IC		Div/Group Sup																																																																					
LOSC		Div/Group Sup																																																																					
TOSC		Div/Group Sup																																																																					
Safety Officer		Div/Group Sup																																																																					
Liaison Officer		Plan Sect Chief																																																																					
PIO		Logs Sect Chief																																																																					
		Fin Sect Chief																																																																					

INCIDENT BRIEFING
ICS 201
Page 3

[illegible]

ICS 201
Page 4

8. Site Safety and Control Analysis

Site Control:

1. Is Site Control set up? ☐ Yes ☐ No Comments/Name:		2. Is there an on-scene command post? ☐ Yes ☐ No If so, where:	
3. Have all personnel been accounted for? ☐ Yes ☐ No ☐ Don't know		Injuries:	Fatalities:
		Unaccounted:	Trapped:
4. Are public observers involved? ☐ Yes ☐ No If so, who and where:		5. Is a decon area set up? ☐ Yes ☐ No If so, where:	

Hazard Identification, immediate signs of: (if Yes, explain in remarks)

1. Electrical hazards? ☐ Yes ☐ No	2. Products identified? ☐ Yes ☐ No If so, what:
3. Wind Direction ☐ Away from your position Wind speed: ☐ Towards your position	4. Is a safe approach possible? ☐ Yes ☐ No
5. Any abnormal odors or smells? ☐ Yes ☐ No If so, what:	6. Vapors visible? Color: ☐ Yes ☐ No
7. Tide Times: Low _____ High _____	8. Ignition sources nearby? ☐ Yes ☐ No
9. Is local traffic a potential problem? ☐ Yes ☐ No	10. Product placards, color codes visible ☐ Yes ☐ No
11. Other Hazard(s)? ☐ Yes ☐ No	12. As you approach the scene from the upwind side, do you note a change in status of any of the above? ☐ Yes ☐ No

Hazard Mitigation: (Have you determined the necessity for any of the following)

1. Entry Objectives:			
2. Are warning signs or barricades required? ☐ Yes ☐ No Identify Type:			
3. Atmospheric Testing? ☐ Yes ☐ No	a. Initial Results: LEL _____ H2S _____ O2 _____ CO _____ Benzene _____ Other _____ Time: _____		b. Sampling Equipment:
c. Sampling Location(s):	d. Sample Frequency:		e. Personal Exposure Monitoring:
Time/Location: _____	LEL _____	H2S _____	O2 _____
Time/Location: _____	LEL _____	H2S _____	O2 _____
Time/Location: _____	LEL _____	H2S _____	O2 _____
Time/Location: _____	LEL _____	H2S _____	O2 _____
4. Protective gear/level:	a. Gloves:	b. Clothing:	c. Boots:
d. Respirators:	e. Chemical cartridge change frequency:		
5. Decon			
a. Instructions:			
b. Equipment and Materials			
6. Emergency Escape Route Established ☐ Yes ☐ No			
7. Field responders briefed on hazards? ☐ Yes ☐ No			
8. Remarks:			
INCIDENT BRIEFING			ICS 201 Page 5

INCIDENT BRIEFING (ICS FORM 201-OS)

Purpose. The Incident Briefing form provides the Unified Command (and the Command and General Staffs assuming command of the incident) with basic information regarding the response situation and the resources allocated to the incident. It is also a permanent record of the initial incident response.

Preparation. This briefing form is prepared under the direction of the initial Incident Commander for presentation to the Unified Command. This form can be used for managing the response during the initial period until the beginning of the first operational period for which an Incident Action Plan (IAP) is prepared. The information from the ICS form 201-OS can be used as the starting point for other ICS forms or documents.

- Page 1 (Map/Sketch) may transition immediately to the Situation Map
- Page 2 (Summary of Current Actions) may be used to continue tracking the response actions and as the initial input to the ICS form 215-OS and the ICS form 232-OS
- Page 3 (Current Organization) may transition immediately to the Organization List (ICS form 203-OS) and/or Organization Chart (ICS form 207-OS)
- Page 4 (Resources Summary) may be used to continue tracking resources assigned to the incident and as input to individual T-Cards (ICS form 219) or other resource tracking system.
- Page 5 (Site Safety and Control Analysis) Purpose: The 201-5 is used as a basis for safety 'tailgate briefing' to clear personnel entering a scene, and is a predecessor to the Site Safety Plan.

Distribution. After the initial briefing of the Unified Command and General Staff members, the Incident Briefing is duplicated and distributed to the Command Staff, Section Chiefs, Branch Directors, Division/Group Supervisors, and appropriate Planning and Logistics Section Unit Leaders. The sketch map and summary of current action portions of the briefing form are given to the Situation Unit while the Current Organization and Resources Summary portion are given to the Resource Unit. All completed original forms MUST be given to the Documentation Unit.

Item #	Item Title	Instructions
1.	Incident Name	Enter the name assigned to the incident.
2.	Prepared By Date Time	Enter the name and position of the person completing the form. Enter date prepared (month, day, year). Enter time prepared (24-hour clock).
3.	Map/Sketch	Show the total Area of Operations, the incident site, overflight results, trajectories, impacted shorelines, or other graphics depicting situation and response status on a sketch or attached map.
4.	Initial Incident Objectives	Enter short, clear, concise statements of the objectives for managing the initial response.
5.	Summary of Current Actions	Enter the actions taken in response to the incident, including the time, and note any significant events or specific problem areas.
6.	Current Organization	Enter on the organization chart the names of the individuals assigned to each position. Modify the chart as necessary, using additional boxes in the space provided under the Sections. Two blank lines are provided in the Unified Command section for adding other agencies or groups participating in the Unified Command and/or for multiple Responsible Parties.
7.	Resources Summary Resource Needed Time Ordered Resource Identifier ETA On-Scene Location /Assignment / Status	Enter the following information about the resources allocated to the incident: Description of the resource needed (e.g., open water boom, skimmer, vac truck, etc.). Time ordered (24-hour clock). Identifier for the resource (e.g., radio call-sign, vessel name, vendor name, license plate, etc.). Estimated time for the resource to arrive at the staging area. Checkmark upon the resource's arrival. Location of the resource, the actual assignment, and the status of the resource (if other than working).

Item #	Item Title	Instructions
8.	Safety Requirement	Before entering a potentially hazardous work environment, IT MUST BE EVALUATED BY A COMPETENT PERSON to establish safe work practices, personal protective equipment, and other control procedures. At a minimum, lower explosive limit (LEL), Oxygen, and Benzene levels must be evaluated. Spill cleanup areas shall be controlled as "regulated areas." If Benzene vapors are or may be expected to equal the action level of .5 ppm, then the area must be posted with the following warning: Danger – Benzene Cancer Hazard – Flammable – No Smoking – Authorized Personnel Only – Respirator Required (Reference 201 Page 5 Safety and Control Analysis Instructions below)
		<i>NOTE: Additional pages may be added to ICS form 201-OS if needed.</i>

201 Page 5 Site Safety and Control Analysis Instructions

Purpose:

The intent of the 201-5 is to document and communicate the Site Control, Hazard Identification, and Hazard Mitigation measures in order to safely execute all actions within the emergency phase of the incident. It is the emergency phase site safety and control analysis plan.

Site Control:

1. Site Control includes an isolation perimeter and access control points.
3. List numbers for each non-zero category. Describe each occurrence either in Remarks (#8) or reference applicable accident report(s).
5. Say whether the "decon" area is depicted on the 201-1. (It should be)

Hazard Identification (and immediate signs of)

1. If 'Yes' is indicated, explain in Remarks (#8)
4. If 'Yes' is indicated, explain in Remarks (#8)
5. Only smells that are not natural, not normally present
6. If 'Yes' is indicated, include the color
8. If 'Yes' is indicated, circle which fire hazards are present. Continue explanation in Remarks (#8) starting with 'Haz ID #8'
9. If 'Yes' is indicated, continue explanation in Remarks (#8) starting with 'Haz ID #9'
10. If 'Yes' is indicated, list placards and color codes seen. Also note type of container, manufacturer label(s)
11. If 'Yes' is indicated, explain in Remarks (#8)
12. If 'Yes' is indicated, explain in Remarks (#8)

Hazard Mitigation

1. Describe simply-stated objectives.
 2. For example, benzene and no smoking signs
 3. All atmospheric monitoring results should be logged on the Atmospheric Monitoring Results Sheet
 - 3a. Equipment can include combustible gas indicator, O2 monitor, colometric tubes (type) HNU/OVA, etc.
 - 3b. Enter initial monitoring results from the 201-1
 - 3c. If the location(s) is/are depicted on the 201-1, so state
 - 3d. Frequency can be continuous, hourly, etc.
 - 3e. Describe the procedures in effect for personal (sampling for on-site personnel) and medical monitoring.
 4. List the Protection Level (A-D) including the specific PPE needs. For APRs, estimate the life of the respirator cartridge.
 6. Describe the route. If the route is depicted on the 201-1, so state.
 7. Use Worker Declaration Log to ensure all field responders are briefed on hazards.
 8. Use 'Remarks for further explanations of the above items. Start with the item number (SC#X, HazID#X, HM#X).
- Prepared by: Print the name/company/ICS position of the person preparing the form.

THIS PAGE INTENTIONALLY LEFT BLANK

CHECK-IN LIST Personnel (ICS FORM 211p)

Special Note. This form is used for personnel check-in only.

Purpose. Personnel arriving at the incident can be checked in at various incident locations. Check-in consists of reporting specific information that is recorded on the form.

Preparation. The Check-In List is initiated at a number of incident locations including staging areas, base, camps, helibases, and ICP. Managers at these locations record the information and give it to the Resource Unit as soon as possible.

Distribution. Check-In Lists are provided to both the Resource Unit and the Finance Section. The Resource Unit maintains a master list of all equipment and personnel that have reported to the incident. All completed original forms MUST be given to the Documentation Unit.

Item #	Item Title	Instructions
1.	Incident Name	Enter the name assigned to the incident.
2.	Operational Period	Enter the time interval for which the form applies. Record the start and end date and time.
3.	Check-in Location	Check the box for the check-in location.
4.	Name	Enter the name of the person.
5	Company/Agency	Enter the company or agency with which the individual is associated.
6.	ICS Section / Assignment / Qualifications.	Enter ICS Section and assignment, if known and note any other ICS qualifications if needed.
7.	Contact Numbers (Cell)	Enter the contact information for the person.
8.	Initial Incident Check-in?	Check if this is the first time a person has checked in for this incident.
9.	Time In/Out	Enter the time the person checks in and/or out (24-hour clock). If the person is leaving on a regular basis for document runner or attending a meeting in another room, it is not necessary to log them out.
10.	Prepared By Date/Time Prepared	Enter name and title of the person preparing the form. Enter date (month, day, year) and time prepared (24-hour clock).
11.	Date/Time Sent to Resource Unit	Enter date (month, day, year) and time (24-hour clock) the form is sent to the Resource Unit.

BOMB THREAT CALL PROCEDURES

Most bomb threats are received by phone. Bomb threats are serious until proven otherwise. Act quickly, but remain calm and obtain information with the checklist on the right-hand side of this card.

IF A BOMB THREAT IS RECEIVED BY PHONE:

1. Remain calm. Keep the caller on the line for as long as possible. **DO NOT HANG UP**, even if the caller does.
2. Listen carefully. Be polite and show interest.
3. Try to keep the caller talking to learn more information.
4. If possible, write a note to a colleague to call the authorities or, as soon as the caller hangs up, immediately notify them yourself.
5. If your phone has a display, copy the number and/or letters on the window display.
6. Complete the Bomb Threat Checklist (reverse side) immediately. Write down as much detail as you can remember. Try to get exact words.
7. Immediately upon termination of the call, do not hang up, but from a different phone, contact FPS immediately with information and await instructions.

IF A BOMB THREAT IS RECEIVED BY HANDWRITTEN NOTE:

- Call (local MPC Security): _____
- Handle note as minimally as possible.

IF A BOMB THREAT IS RECEIVED BY EMAIL:

- Call (local MPC Security): _____
- Do not delete the message.

SIGNS OF A SUSPICIOUS PACKAGE:

- No return address
- Excessive postage
- Stains
- Strange odor
- Strange sounds
- Unexpected delivery
- Poorly handwritten
- Misspelled words
- Incorrect titles
- Foreign postage
- Restrictive notes

DO NOT:

- Use two-way radios or cellular phone; radio signals have the potential to detonate a bomb.
- Evacuate the building until police arrive and evaluate the threat.
- Activate the fire alarm.
- Touch or move a suspicious package.

WHO TO CONTACT:

- Follow Local Emergency Procedures

MAPLINE 1-877-627-5463

Date: _____ Time: _____ ☐ a.m. ☐ p.m.

Time Caller Hung up: _____ ☐ a.m. ☐ p.m.

Phone No. Where Call Received: _____

ASK CALLER:

Where is the bomb located?
(Building, Floor, Room, etc.)

When will it go off?

What does it look like?

What kind of bomb is it?

What will make it explode?

Did you place the bomb? ☐ Yes ☐ No

Why?

What is your name?

EXACT WORDS OF THREAT:

INFORMATION ABOUT CALLER:

Where is the caller located? (Background and level of noise)

Estimated age: _____

Is voice familiar? If so, who does it sound like?

Other points: _____

Caller's Voice:

- ☐ Accent
- ☐ Angry
- ☐ Calm
- ☐ Clearing throat
- ☐ Coughing
- ☐ Cracking voice
- ☐ Crying
- ☐ Deep
- ☐ Deep breathing
- ☐ Disguised
- ☐ Distinct
- ☐ Excited
- ☐ Female
- ☐ Laughter
- ☐ Lisp
- ☐ Loud
- ☐ Male
- ☐ Nasal
- ☐ Normal
- ☐ Ragged
- ☐ Rapid
- ☐ Raspy
- ☐ Slow
- ☐ Slurred
- ☐ Soft
- ☐ Stutter

Background Sounds:

- ☐ Animal Noises
- ☐ House Noises
- ☐ Kitchen Noises
- ☐ Street Noises
- ☐ Booth
- ☐ PA system
- ☐ Conversation
- ☐ Music
- ☐ Motor
- ☐ Clear
- ☐ Static
- ☐ Office machinery
- ☐ Factory machinery
- ☐ Local
- ☐ Long distance

Threat Language:

- ☐ Incoherent
- ☐ Message read
- ☐ Taped
- ☐ Irrational
- ☐ Profane
- ☐ Well-spoken

Other Information:

AN ACTIVE SHOOTER IS IN YOUR VICINITY

1. EVACUATE

- Have an escape route and plan in mind.
- Leave your belongings behind.
- Keep your hands visible.

2. HIDE OUT

- Hide in an area out of the shooter's view.
- Block entry to your hiding place and lock the doors.
- Silence your cell phone and/or pager.

3. TAKE ACTION

- As a last resort and only when your life is in imminent danger.
- Attempt to incapacitate the shooter.
- Act with physical aggression and throw items at the active shooter.

CALL 911 WHEN IT IS SAFE TO DO SO

COPING WITH AN ACTIVE SHOOTER SITUATION

- Be aware of your environment and any possible dangers.
- Take note of the two nearest exits in any facility you visit.
- If you are in an office, stay there and secure the door.
- Attempt to take the active shooter down as a last resort.

**CONTACT MPC CORPORATE SECURITY AT
MPCCORPORATESECURITY@MGROUPNET.COM
FOR MORE INFORMATION AND TRAINING
ON WORKPLACE VIOLENCE, ACTIVE SHOOTER
RESPONSE AND TELEPHONE BOMB THREATS.**

HOW TO RESPOND WHEN LAW ENFORCEMENT ARRIVES

- Remain calm and follow instructions.
- Put down any items in your hands (i.e., bags, jackets).
- Raise hands and spread fingers.
- Keep hands visible at all times.
- Avoid quick movements toward officers such as holding on to them for safety.
- Avoid pointing, screaming or yelling.
- Do not stop to ask officers for help or direction when evacuating.

INFORMATION YOU SHOULD PROVIDE TO LAW ENFORCEMENT OR 911 OPERATOR

- Location of the active shooter.
- Number of shooters.
- Physical description of shooter(s).
- Number and type of weapons held by shooter(s).
- Number of potential victims at the location.

PROFILE OF AN ACTIVE SHOOTER

An active shooter is an individual actively engaged in killing or attempting to kill people in a confined and populated area, typically through the use of firearms.

CHARACTERISTICS OF AN ACTIVE SHOOTER SITUATION

- Victims are selected at random.
- The event is unpredictable and evolves quickly.
- Law enforcement is usually required to end an active shooter situation.



**Marathon
Petroleum Company LP**

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural
Resources Department

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party	OGRID
Contact Name	Contact Telephone
Contact email	Incident # (assigned by OCD)
Contact mailing address	

Location of Release Source

Latitude _____ Longitude _____
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	Site Type
Date Release Discovered	API# (if applicable)

Unit Letter	Section	Township	Range	County

Surface Owner: ☐ State ☐ Federal ☐ Tribal ☐ Private (Name: _____)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

☐ Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
☐ Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	☐ Yes ☐ No
☐ Condensate	Volume Released (bbls)	Volume Recovered (bbls)
☐ Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
☐ Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? ☐ Yes ☐ No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?	

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

☐ The source of the release has been stopped.	
☐ The impacted area has been secured to protect human health and the environment.	
☐ Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.	
☐ All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why:	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
Printed Name: _____	Title: _____
Signature: _____	Date: _____
email: _____	Telephone: _____
<u>OCD Only</u>	
Received by: _____	Date: _____

Incident ID	
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	_____ (ft bgs)
Did this release impact groundwater or surface water?	☐ Yes ☐ No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ☐ No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes ☐ No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ☐ No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ☐ No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ☐ No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ☐ No
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ☐ No
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ☐ No
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ☐ No
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ☐ No
Did the release impact areas not on an exploration, development, production, or storage site?	☐ Yes ☐ No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

Characterization Report Checklist: Each of the following items must be included in the report.

- ☐ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☐ Field data
- ☐ Data table of soil contaminant concentration data
- ☐ Depth to water determination
- ☐ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- ☐ Boring or excavation logs
- ☐ Photographs including date and GIS information
- ☐ Topographic/Aerial maps
- ☐ Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

State of New Mexico
Oil Conservation Division

Page 4

Incident ID	
District RP	
Facility ID	
Application ID	

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

Incident ID	
District RP	
Facility ID	
Application ID	

Remediation Plan

Remediation Plan Checklist: *Each of the following items must be included in the plan.*

- ☐ Detailed description of proposed remediation technique
- ☐ Scaled sitemap with GPS coordinates showing delineation points
- ☐ Estimated volume of material to be remediated
- ☐ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☐ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- ☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- ☐ Extents of contamination must be fully delineated.
- ☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: _____ Date: _____

Incident ID	
District RP	
Facility ID	
Application ID	

Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

Closure Report Attachment Checklist: Each of the following items must be included in the closure report.

- ☐ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☐ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☐ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☐ Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: _____ Date: _____

Printed Name: _____ Title: _____

SECTION 6 TRAINING & EXERCISES

6.1 General Emergency Action Plan Training

Employees who work at the facility shall receive training on this EAP when the plan is developed, when the employee is assigned initially to the facility, when the employees' responsibilities under the plan change, when the plan is updated and during their annual field site EAP training. These employees include terminal operators, mechanics, supervisors and managers. This training will consist of an initial session with refresher training annually which will not exceed 15 months from the previous year's training date. Initial training shall consist of classroom delivered training and refresher training may be either classroom and/or Computer based training.

6.2 H₂S Training

[NMAC 19.15.11.9.B(2)(D)], [API RP-55 7.4D]

The company will conduct annual training for its own personnel as well as for the public and emergency responders as detailed below. Training will include:

- Characteristics of H₂S safety precautions
- An overview of the Titan Plant, AGI Operations, Booster Stations and Pipeline operations
- A review of their roles in responding to activation of the Titan Plant H₂S Contingency Plan elements within this EAP
- Location of the ROE and how to protect the public within the radii of exposure.
- Potential roadblock locations, potential evacuation routes, and how they can assist in implementing the Plan.

6.2.1 Training of Essential Personnel

Annual training for company personnel shall include plant and pipeline operators, mechanics, instrument and electrical technicians, and maintenance support personnel. Plant Operators will be responsible for initiating and implementing this Plan. In addition, all company personnel will receive:

- **H₂S Contingency Plan Training:** This annual training will include a review of all aspects of the Plan and will include, at a minimum, one tabletop drill involving activation of the Plan.
- **Plant, Compressor Station, and Pipeline Orientation Training:** All company personnel, visitors, and contractors must attend an overview orientation prior to obtaining permission to enter the Plant, Compressor Station, or Pipeline ROW.
 - A refresher course on this training is required annually for all people. Included as part of this orientation is how to respond and evacuate safely in the event of an H₂S alarm or release. This training also complies with the requirements of the company and its Plant Process Safety Management Program and Procedures Manuals.
- **H₂S and SO₂ training:** All company personnel must be H₂S certified and must also receive annual refresher training on H₂S and SO₂, which is conducted by accredited company personnel. Individuals must maintain their H₂S certification to work at the Plant, Compressor Station, or Pipeline ROW.
 - If an individual is unable to attend, they may be required to attend a third-party training session from an outside provider. All contract employees are required to have H₂S training and to provide the Plant with a copy of their certification card prior to obtaining permission to enter the Plant, Compressor Station, or Pipeline ROW.
- **Respirators:** all company personnel are trained annually on the proper use of respirators. In addition to the annual training, all company personnel are fit-tested annually on the respirators. All company personnel must have medical clearance for respirator use.

Titan Gas Treatment Plant Emergency Action PlanTraining and Exercises

- **Hazard Communication:** all Plant personnel are trained annually on Hazard Communication. The annual training includes, at a minimum, the use of safety data sheets (SDS) for those materials that are present at the Plant.
- **Personal Protective Equipment (PPE):** all personnel are trained annually on the company requirements for PPE. The training includes, at a minimum, a review of all the types and levels of PPE and how to select the correct equipment for the job.

6.2.2 Notification and Training of Producers Located within the ROE

The company will provide annual training to the producers listed in [Section 3](#) that includes:

- An overview of Compressor Station and Pipeline operations
- Design and operating safety features of the facilities
- A review of the H₂S alarms and significance
- Notification procedures
- Roadblock locations
- Potential evacuation routes
- Procedures for sheltering in place
- Radii of exposure

6.2.3 Training of Public Officials and Emergency Response Agencies

All the Emergency Response Agencies listed in the Preface: Distribution Table will have copies of this Plan and will receive training from qualified company personnel. Training for emergency response agencies will be the same as indicated in [6.2.2](#) above:

6.3 Emergency Action Plan Exercises

6.3.1 Frequency

An exercise based on this EAP should be conducted at least once per calendar year.

6.3.2 Exercise Design

Exercises shall be designed to test operator and IMT actions for responses covered in Section 4 of this EAP. The exercise can be conducted in one of several manners:

- ICS-201 drill (Initial Incident Briefing) based on a scenario, with notifications and documentation of actions taken
- Round-table discussion on actions to take during an incident, with input from affected agencies, IMT members and initial responders
- Unannounced drill

6.3.3 Evacuation Drill

On an annual basis, the facility shall conduct a complete evacuation of the facility to test the evacuation and accountability procedures.

6.4 H₂S Emergency Response Drills

- The company will conduct, at least, a tabletop drill annually, and multiple drills during the year may be scheduled at the discretion of the Plant Manager
- The annual drill will execute this Plan and include, at minimum, the Public Officials and Local Emergency Response Agencies listed in [Section 3](#).
- Annual training will also include contacting the interested parties, including all entities that have been identified as being within the 500 ppm and 100 ppm ROE ([Section 4](#)) to ensure contact information for them is current. [Section 3](#) will be verified and updated annually by the Company to be sure any changes in occupancy, ownership, or new commercial and/or residential buildings are reflected, and all owners/occupants receive training on protective measures

- The drills will also include briefing public officials on issues such as evacuation or shelter-in-place plans.

6.5 H₂S Emergency Response Training and Attendance Documentation

Pursuant to NMAC 19.15.11.9(B)2(D), drills and training pertaining to the Plant, Pipeline, and Compressor Station will be documented by plant personnel, and those records shall be maintained for a minimum of five (5) years at the Plant and will be made available to a NMOCD representative upon request.

Training documentation shall include, at minimum, the following:

- Description of the training or scope of the drill
- Attendees and Participants in the training or drill
- Summary of the activities and/or responses
- Post-drill debriefing and reviews

6.6 Post Incident Actions

6.6.1 Lessons Learned

After the exercise is conducted, an after-action discussion or survey will be conducted to elicit feedback on positives and opportunities for improvement. Any comments that require action will be tracked as a recommendation in Intellex.

6.6.2 Incident Investigation

A thorough incident investigation is essential to effective emergency response planning. One of the primary goals of pre planning for emergencies is to minimize the potential for emergencies to develop. The purpose of investigating an incident is to identify the cause of the incident so that measures can be taken to reduce the potential for recurrences.

6.7 Coordination Activities

The facility shall conduct coordination activities with local emergency planning and response organizations. On an annual basis, the following must occur:

- Provide a copy of the emergency action plan to responding fire departments listed in the distribution table in the Preface.
- Have a discussion with the responding fire departments on hazards and other concerns for the site. Document the coordination activities by providing LEPC meeting notes, discussions, sign-in sheets or other documentation to show coordination activities.

THIS PAGE INTENTIONALLY LEFT BLANK

Titan Gas Treatment Plant Emergency Action Plan

Cross Reference

APPENDIX A CROSS REFERENCE

A.1 OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (29 CFR)

PLAN REQUIREMENTS	LOCATION IN THIS PLAN
§1910.38 Emergency Action Plan	
(a) Application. An employer must have an emergency action plan whenever an OSHA standard in this part requires one. The requirements in this section apply to each such emergency action plan.	
(b) Written and oral emergency action plans. An emergency action plan must be in writing, kept in the workplace, and available to employees for review. However, an employer with 10 or fewer employees may communicate the plan orally to employees.	
(c) Minimum elements of an emergency action plan. An emergency action plan must include at a minimum:	
(1) Procedures for reporting a fire or other emergency;	Section 3, 4
(2) Procedures for emergency evacuation, including type of evacuation and exit route assignments;	Section 4
(3) Procedures to be followed by employees who remain to operate critical plant operations before they evacuate;	Section 4
(4) Procedures to account for all employees after evacuation;	Section 4
(5) Procedures to be followed by employees performing rescue or medical duties; and	Section 2, 3, 4
(6) The name or job title of every employee who may be contacted by employees who need more information about the plan or an explanation of their duties under the plan.	Section 3
(d) Employee alarm system. An employer must have and maintain an employee alarm system. The employee alarm system must use a distinctive signal for each purpose and comply with the requirements in § 1910.165.	Section 4
(e) Training. An employer must designate and train employees to assist in a safe and orderly evacuation of other employees.	Section 6
(f) Review of emergency action plan. An employer must review the emergency action plan with each employee covered by the plan:	
(1) When the plan is developed or the employee is assigned initially to a job;	Section 6
(2) When the employee's responsibilities under the plan change; and	Section 6
(3) When the plan is changed.	Section 6
§1910.120 Hazardous Waste Operations and Emergency Response.	
(I) Emergency Response by Employees at Uncontrolled Hazardous Waste Sites.	
(1) Emergency response plan.	
(i) An emergency response plan shall be developed and implemented by all employers within the scope of paragraphs (a)(1)(i) through (ii) of this section to handle anticipated emergencies prior to the commencement of hazardous waste operations. The plan shall be in writing and available for inspection and copying by employees, their representatives, OSHA personnel and other governmental agencies with relevant responsibilities.	Overall Plan
(ii) Employers who will evacuate their employees from the danger area when an emergency occurs, and who do not permit any of their employees to assist in handling the emergency, are exempt from the requirements of this paragraph if they provide an emergency action plan complying with 29 CFR 1910.38.	
(2) Elements of an emergency response plan. The employer shall develop an emergency response plan for emergencies which shall address, as a minimum, the following:	
(i) Pre-emergency planning.	Section 4
(ii) Personnel roles, lines of authority, training and communication.	Section 3, 6
(iii) Emergency recognition and prevention.	Section 4
(iv) Safe distances and places of refuge.	Section 4
(v) Site security and control.	Section 4
(vi) Evacuation routes and procedures.	Section 1, 4

Titan Gas Treatment Plant Emergency Action Plan

Cross Reference

PLAN REQUIREMENTS	LOCATION IN THIS PLAN
(vii) Decontamination procedures which are not covered by the site safety and health plan.	N/A (covered in SSHP)
(viii) Emergency medical treatment and first aid.	Section 4
(ix) Emergency alerting and response procedures.	Section 3
(x) Critique of response and follow-up.	Section 6
(xi) Personal protective equipment (PPE) and emergency equipment.	
(3) Procedures for handling emergency incidents.	Section 4
(i) In addition to the elements for the emergency response plan required in subsection (I)(2), the following elements shall be included for emergency response plans:	
(A) Site topography, layout, and prevailing weather conditions.	Section 1
(B) Procedures for reporting incidents to local, state, and federal governmental agencies.	Section 3
(ii) The emergency response plan shall be a separate section of the Site Safety and Health Plan.	
(iii) The emergency response plan shall be compatible and integrated with the disaster, fire and/or emergency response plans of local, state, and federal agencies.	Section 1
(iv) The emergency response plan shall be rehearsed regularly as part of the overall training program for site operations.	Section 6
(v) The site emergency response plan shall be reviewed periodically and, as necessary, be amended to keep it current with new or changing site conditions or information.	Section 1
(vi) An employee alarm system shall be installed in accordance with 29 CFR 1910.165 to notify employees of an emergency situation, to stop work activities if necessary, to lower background noise in order to speed communication, and to begin emergency procedures.	Section 4
(vii) Based upon the information available at time of the emergency, the employer shall evaluate the incident and the site response capabilities and proceed with the appropriate steps to implement the site emergency response plan.	Section 4

A.2 NMOCD H2S Contingency Plan

Contingency Plan Requirements Checklist (19.15.11.9.B NMAC Requirements)	Applicable Regulation(s)	Included (Yes/No)	Location in Plan
Emergency Procedures			
Responsibilities and duties of personnel during an emergency	19.15.11.9.B.2.a 19.15.11.9.B.2.d	Yes	4.3
Immediate action plan	19.15.11.9.B.2.a; 19.15.11.9.B.2.d; 12.15.11.12.D.2 (well control)	Yes	2
Evacuation and shelter in place plan	19.15.11.9.B.2.a; 19.15.11.9.B.2.d	Yes	2, 4.5
Telephone Numbers: Emergency Responders	19.15.11.9.B.2.a; 19.15.11.9.H	Yes	3
Telephone Numbers: Public Agencies	19.15.11.9.B.2.a; 19.15.11.9.H	Yes	3
Telephone Numbers: Local Government	19.15.11.9.B.2.a; 19.15.11.9.H	Yes	3
Telephone Numbers: Appropriate Public	19.15.11.9.B.2.a	Yes	3
Location of potentially affected public areas	19.15.11.7.H; 19.15.11.8.C.2; 19.15.11.8.D; 19.15.11.9.A; 19.15.11.9.B.2.a; 19.15.11.9.D.2; 19.15.11.11.D; 19.15.11.12.B.2.a; 19.15.11.12.D	Yes	4.4
Location of potentially affected public roads	19.15.11.7.H.2; 19.15.11.7.J; 19.15.11.9.B.2.a; 19.15.11.9.B.2.c; 19.15.11.9.C	Yes	4.4
Proposed evacuation routes including the locations of roadblocks	19.15.11.9.B.2.a; 19.15.11.9.B.2.d	Yes	2, 4.4, 4.5
Public notification procedures	19.15.11.9.B.2.a	Yes	2, 3

REVISION 1
June 2026

A-2

Titan Gas Treatment Plant Emergency Action Plan

Cross Reference

Contingency Plan Requirements Checklist (19.15.11.9.B NMAC Requirements)	Applicable Regulation(s)	Included (Yes/No)	Location in Plan
Availability and location of safety equipment and supplies	19.15.11.9.B.2.a; 19.15.11.11.C; 19.15.11.12.D	Yes	4.7
Characteristics of Hydrogen Sulfide and Sulfur Dioxide			
Discussion of characteristics	19.15.11.9.B.2.b	Yes	4.10
Maps and Drawings			
Area(s) of exposure	19.15.11.7.B; 19.15.11.9.B.2.c	Yes	2, 4.11
Public areas within area of exposure	19.15.11.7.B; 19.15.11.7.H; 19.15.11.7.I; 19.15.11.7.K.1-3; 19.15.11.8.C.1-2; 19.15.11.8.D; 19.15.11.9.B.2.c; 19.15.11.9.C; 19.15.11.9.D.2; 19.15.11.11.D; 19.15.11.11.E; 19.15.11.12.D; 19.15.11.12.D.	Yes	2
Public roads within area of exposure	19.15.11.9.B.2.a; 19.15.11.9.B.2.c; 19.15.11.9.C	Yes	2
Training and Drills			
Training of personnel to include responsibilities, duties, hazards, detection, personal protection and contingency procedure	19.15.11.9.B.2.a; 19.15.11.9.B.2.d; 19.15.11.12; 19.15.11.13	Yes	6.2.1
Periodic drills or exercises that simulate a release	19.15.11.9.B.2.d	Yes	6.4
Documentation of training, drills, and attendance	19.15.11.9.B.2.d	Yes	6.5
Training of residents on protective measures	19.15.11.9.B.2.d	Yes	6.2
Briefing of public officials on evacuation or shelter-in-place	19.15.11.9.B.2.a; 19.15.11.9.B.2.d	Yes	6.2
Coordination With State Emergency Plans			
How emergency response actions will coordinate with the OCD and the State Police response plans	19.15.11.9.B.2.e	Yes	3.6
Plan Activation Levels			
Activation levels and description of events which may lead to a release in excess of activation level	19.15.11.9.B.2.f; 19.15.11.9.C; 19.05.11.16	Yes	2
Plan Activation			
Commitment to activate contingency plan whenever H ₂ S concentration of more than 100 ppm in a public area or 500 ppm at a public road	19.15.11.7.H & 19.15.11.7.I; 19.15.11.9.B.2.a; 19.15.11.9.B.2.c; 19.15.11.9.C	Yes	2.1.1
Commitment to activate contingency plan whenever H ₂ S concentration of more than 100 ppm 3000 feet from the site of release	19.15.11.7.H; 19.15.11.9.C	Yes	2.1.1
Acid Gas Injection Well Information			
Well name, API#, legal description, map location, figures and/or construction diagrams	API RP-49 Recommended Practice for Drilling & Well Servicing Operations Involving Hydrogen Sulfide; API RP-54 Recommended Practice for Occupational Safety for Oil & Gas Drilling & Servicing Operations	Yes	1.5, Figures 1-8 ~ 1-10

Titan Gas Treatment Plant Emergency Action Plan

Cross Reference

Contingency Plan Requirements Checklist (19.15.11.9.B NMAC Requirements)	Applicable Regulation(s)	Included (Yes/No)	Location in Plan
Compliance with OCD "Well" Regulations	19.15.11.7K(3); 19.15.11.9B(2); 19.15.11.9H; 19.15.11.10; 19.15.11.11; 19.15.11.12; 19.15.11.16	Yes	1.2
Compliance with applicable standards	API RP-49; API RP-54 (formerly RP-68); API RP-55; & NACE Standards for Sour Gas Wells	Yes	1.2
Adequate H ₂ S Detection Monitoring	19.15.11.11.B	Yes	4.3.2
Notification of contingency plan implementation with C-141 full report submitted to the OCD within 15-days of release	19.15.11.16	Yes	2, 3, 5
Miscellaneous			
AGI Well Location	19.15.11.7K(3); 19.15.11.9B(2); 19.15.11.9H; 19.15.11.10; 19.15.11.11; 19.15.11.12; 19.15.11.16	Yes	1.5
Pipeline(s)	19.15.11.12; 19.15.11.12.B; 19.15.11.12.C	Yes	Fig 1-7
Flare Stack	19.15.11.11.D	Yes	4.7, Fig 1-4
Signs	19.15.11.10	Yes	4.5
Emergency Shut Down (ESD)	19.15.11.12.D.1	Yes	4.5, Fig 1-6
Hazards	19.15.11.13	Yes	4.5
AGI Wells	19.15.11.7.D.2-4; 19.15.11.7K(3); 19.15.11.9B(2); 19.15.11.9H; 19.15.11.10; 19.15.11.11; 19.15.11.12; 19.15.11.16	Yes	1.5, Figures 1-8 ~ 1-10
Maps and Drawings	19.15.11.9.B.2.c	Yes	1.5.2

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 599753

CONDITIONS

Operator: Northwind Midstream Partners LLC 811 Louisiana St Houston, TX 77002	OGRID: 331501
	Action Number: 599753
	Action Type: [UF-H2S] H2S Contingency Plan (H2S Plan)

CONDITIONS

Created By	Condition	Condition Date
joel.stone	See attached letter to operator, sent on 07/02/2026.	7/2/2026