

# WHIPTAIL MIDSTREAM

## Operations Plan

New Mexico Oil Conservation District

Title 19, Chapter 15, Part 28, NMAC

## **Purpose**

This Operations Plan, written and submitted to the New Mexico Oil Conservation District (NMOCD) by Whiptail Midstream (Whiptail), describes the operational practices, procedures, and actions that have been adopted and put in place by Whiptail to ensure a safe operation that minimizes leaks and releases of natural gas from its natural gas assets to the atmosphere and the surrounding environment.

## **System Overview**

The Whiptail asset covered by this document is a non-regulated, low pressure natural gas gathering system known as the Chaco 436 Natural Gas Gathering System, located in Section 5, T22N/R06W, in San Juan county of New Mexico.

This gas gathering system was constructed during the decade of 2010 – 2020, and gathers sweet natural gas through buried steel pipelines (but including normal surface appurtenances such as line junctions and above-ground valving). The system is operated at low pressure; therefore it is operating as a “wet” system, with no dehydration and only free water removal, which is the responsibility of the upstream operators. Normal operating pressure is less than 150 psig, and the system Maximum Allowable Operating Pressure (MAOP) is 750 psig. This Whiptail gathering system is a non-regulated system.

## **Operational Practices**

Whiptail has numerous operational practices that protect people and employees who live and work near the assets, protect the environment, and maintain a high level of equipment and pipeline integrity. These practices include:

- Routine inspection of pipeline rights-of-way, surface piping, and other equipment associated with natural gas gathering operations, using both visual inspection and leak detection equipment.
- Inspection of buried pipelines during any excavation exposure of a Whiptail pipeline, including cathodic protection readings and pipe thickness readings.
- All buried pipelines are marked above ground, using pipeline markers with instructions for contacting Whiptail in the event of a pipeline emergency.
- A robust preventive maintenance program in which tasks are scheduled and documented, such as pipeline pigging, annual right-of-way leak survey, internal corrosion monitoring, and routine facility safety inspections. Whiptail uses a Computerized Maintenance Management System (CMMS) to schedule and track these and other work tasks. The CMMS is also used to document corrective, unplanned work.
- Pipeline pigging is performed on a regular, scheduled basis. Pigging frequency varies from weekly to monthly, dependent on the size of the pipeline, the topography of the individual pipeline, and by monitoring the pigging section pressure drop and operating efficiency.
  - Pigged liquids are delivered to a downstream system at the delivery point to that gathering system.

- Whiptail gas pipelines are monitored for internal corrosion through the use of testing for corrosion causing bacteria, and by monitoring metal loss through the use of corrosion coupons that provide a reference for pipeline metal loss.
- Lessons learned that stem from incident investigations and near misses are incorporated into operational practices.
- A robust cathodic protection program in which the entire gas gathering system is surveyed and analyzed no less frequently than annually, and critical cathodic protection data is measured no less frequently than quarterly.
- Utilization of a System Control and Data Acquisition (SCADA) system, in which field data is monitored on a near-real time basis, for indications of potential leaks, inefficient pipeline operation, and abnormal operating conditions.

### **Rule Compliance**

Whiptail has closely reviewed 19.15.28 NMAC (the Rule) and put in place practices that will establish compliance with its requirements. Generally, Whiptail had already established many of the operational and administrative practices required by 19.15.28 NMAC. Following are new practices that Whiptail is adopting as a result of the Rule requirements.

- Conduct and document weekly AVO inspections at Whiptail's natural gas compressor stations.
- Flare natural gas volumes during depressurization of significant pipeline segments. Flaring small volumes from low pressure depressurization of components such as pig receivers and launchers, meter runs, and other small volume sources have been determined to be technically infeasible due to available portable flare design and limitations.
- Formalization of Whiptail's practice of notifying upstream customers of scheduled maintenance or unplanned outages/emergency maintenance.
- Construct and submit GIS gathering system maps of the Whiptail gas gathering systems.
- Establish a record retention policy related to the documents and records related to the Rule.
- Schedule recurring reporting requirements.

### **Certification**

Whiptail Midstream submits this Operations Plan to NMOCD in accordance with the requirement described in NMAC 19.15.28.8C(1).

Whiptail Midstream will assume that this Operations Plan is accepted by NMOCD, and that NMOCD, unless expressly communicated otherwise, agrees that the information provided and represented herein is in accordance with the requirements of the Rule.

**District I**  
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Phone:(575) 393-6161 Fax:(575) 393-0720  
**District II**  
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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

QUESTIONS  
  
Action 43863

QUESTIONS

Operator:  Whiptail Midstream LLC 15 West 6th Street Tulsa, OK 74119	OGRID:  373240
	Action Number:  43863
	Action Type:  [NGGS] NGGS Operations Plan (NGGS-OP)

QUESTIONS

Verification	
Does the operator own the selected facility	Yes
Is the selected facility a natural gas gathering system	Yes

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ACKNOWLEDGMENTS

<input checked="checked" type="checkbox"/>	I certify that, after reasonable inquiry, the statements in and attached to this Natural Gas Gathering System Operations Plan are true and correct to the best of my knowledge and acknowledge that a false statement may be subject to civil and criminal penalties under the Oil and Gas Act.
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