

**MIDSTREAM OPERATIONS PLAN FOR GAS GATHERING
SYSTEM PURSUANT TO NMAC 19.15.28
LONGWOOD RB PIPELINE, LLC
NEW MEXICO OPERATIONS**

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Submitted To:

***State of New Mexico
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TABLE OF CONTENTS

| | | |
|------------|---|----------|
| 1.0 | SYSTEM OVERVIEW | 1 |
| 2.0 | ROUTINE OPERATIONS AND MAINTENANCE..... | 2 |
| 2.1 | PHYSICAL PIPELINE MARKING AND IDENTIFICATION | 2 |
| 2.2 | RIGHT OF WAY (ROW) PATROLS AND LEAK SURVEYS | 2 |
| 2.2.1 | Pipeline Patrolling..... | 2 |
| 2.2.1.1 | Responsibility | 2 |
| 2.2.1.2 | Requirements | 2 |
| 2.3 | PIPELINE PIGGING | 3 |
| 2.4 | PIPELINE MAINTENANCE PROGRAM | 3 |
| 2.4.1 | Pipeline Depressurization Program | 3 |
| 2.4.1.1 | Responsibility | 3 |
| 2.4.1.2 | Requirements | 4 |
| 2.4.2 | Pipeline Pressure Test Program..... | 4 |
| 2.4.2.1 | Responsibility | 4 |
| 2.4.2.1 | Requirements | 4 |
| 3.0 | CATHODIC PROTECTION, CORROSION CONTROL AND LIQUIDS MANAGEMENT | 6 |
| 3.1 | CATHODIC PROTECTION | 6 |
| 3.1.1 | Responsibility..... | 6 |
| 3.1.2 | Requirements | 6 |
| 3.2 | CHEMICAL TREATMENTS | 7 |
| 3.2.1 | Responsibility..... | 7 |
| 3.2.2 | Requirements | 7 |
| 3.3 | FLUID MANAGEMENT | 7 |
| 3.4 | TANK OPERATIONS | 7 |
| 4.0 | PROCEDURES TO REDUCE RELEASES | 8 |
| 4.1 | PROCEDURES TO REDUCE VENTING AND FLARING DURING MAINTENANCE, EMERGENCIES AND MALFUNCTIONS..... | 8 |
| 4.1.1 | Responsibility..... | 8 |
| 4.1.2 | Requirements | 8 |
| 4.2 | PROCEDURES FOR REPORTING SCHEDULED MAINTENANCE AND EMERGENCIES TO UPSTREAM OPERATORS | 8 |
| 4.2.1 | Responsibility..... | 8 |
| 4.2.2 | Requirements | 8 |
| 4.3 | EMERGENCY RESPONSE PLAN | 9 |
| 4.3.1 | Source Elimination | 9 |
| 4.3.2 | Reporting to Regulatory Agencies..... | 9 |

MIDSTREAM OPERATIONS PLAN LONGWOOD RB PIPELINE, LLC NEW MEXICO OPERATIONS AUGUST 18, 2021

1.0 SYSTEM OVERVIEW

Longwood RB Pipeline, LLC ('Longwood') provides natural gas gathering services through approximately 126 miles of natural gas gathering pipelines in Eddy County, New Mexico, including two large-diameter natural gas gathering lines (one in northern Eddy County, New Mexico and the other in southern Eddy County, New Mexico). The gas is sweet and the gathering lines vary in operating pressure. The pipelines are of steel construction, generally buried and have all been constructed in the last ten years (decades 2010-2019 and 2020-2029). The majority of the gathering system does not fall under the requirements of 49 CFR 192: Transportation of Natural and other Gas by Pipeline. Any line segments that fall under the requirements of 49 CFR 192 have been designed and operated accordingly. A full description of the gathering system is available through Longwood's GIS information submitted in accordance with 19.15.28.9 NMAC.

2.0 ROUTINE OPERATIONS AND MAINTENANCE

2.1 Physical Pipeline Marking and Identification

As described in Longwood's GIS information submitted in accordance with 19.15.28.9 NMAC, the majority of the pipelines are located below ground. Longwood has periodic pipeline markings at roadway crossings and along the pipeline length.

2.2 Right of Way (ROW) Patrols and Leak Surveys

Longwood's gas operations are locally operated but are monitored continuously by a remote monitoring center. The remote monitoring center is in constant communication with Longwood field personnel and can monitor volumes and pressures at specified locations within the system and receive alarms to quickly identify potential issues and dispatch field personnel to confirm and/or make necessary repairs as soon as practicable.

2.2.1 Pipeline Patrolling

Pipelines are periodically patrolled to observe surface conditions on and adjacent to the ROW.

2.2.1.1 Responsibility

Longwood's operations group ("Operations") is responsible for scheduling employees or contractors to perform the inspections and overall administration of the land and/or aerial patrol schedule, including follow-up and corrective action initiation.

2.2.1.2 Requirements

- A. Frequency of Patrolling - The frequency of patrols is based on regulatory requirements. All regulated lines have ROW inspected at least twice per year and leak detection performed at least once per year. Non-regulated pipelines are inspected as needed or if an issue is suspected, but at least annually in accordance with 19.15.28.8 (C) (5) NMAC. Any compressor stations associated with the gathering system that fall within the requirements of

19.15.28 NMAC have audio, visual, and olfactory (AVO) inspections performed weekly in accordance with 19.15.28 NMAC.

B. Patrolling Requirements

1. All pipeline ROW(s) are patrolled by walking, vehicle, boat, aerial or a combination of these as needed.
2. The patrol is to observe conditions of exposed pipe and surface conditions on and adjacent to the pipeline ROW, and to look for indications of leaks (boils, slicks, cave-ins and vegetation damage) construction activities, and any other factors which might affect the safety and operation of the pipeline.

2.3 Pipeline Pigging

Longwood performs periodic pigging of lines depending on composition, topography, operating pressure, daily volume and other factors. General industry practice is followed to ensure the integrity of the pipeline. Generally, the gathering lines between the production tank batteries and gas gathering stations are pigged every one to two weeks. Gathering lines from the tank batteries to the processing plant are typically pigged every two weeks. Gathering lines between the compressor stations and processing plant are pigged anywhere from daily to bi-weekly depending on gas composition and other conditions.

Longwood typically runs 3-cup pigs for the majority of lines. Other pig types may be utilized for various situations and needs. Pigging needs vary depending on the composition of the natural gas feeding into the gathering system. Pigs begin at production tank batteries, compressor stations or at other pig launching locations throughout the system.

2.4 Pipeline Maintenance Program

Longwood monitors the gas gathering pipeline to determine when maintenance may be needed.

2.4.1 Pipeline Depressurization Program

2.4.1.1 Responsibility

- Longwood's Operations Manager is responsible for all surveys, inspections and

documentation as required within this section.

2.4.1.2 Requirements

- When a pipeline segment needs to be depressurized, the segment is isolated at the nearest block valves upstream and downstream to minimize the amount of gas that needs to be removed.
- During scheduled maintenance, gas is routed to a portable flare stack.
- During unscheduled maintenance or an emergency, gas is routed to a portable flare stack if technically feasible, otherwise, gas may be vented to a safe location.
- During depressurization, a Longwood representative is present to monitor the process, control access to the location, watch for unsafe conditions, halt the depressurization if an unsafe condition arises, and call for additional assistance or emergency help if needed.

2.4.2 Pipeline Pressure Test Program

2.4.2.1 Responsibility

- Longwood's Construction Foreman is responsible for all surveys, inspections and documentation as required within this section.

2.4.2.1 Requirements

- Pipelines are pressure tested according to general industry standards when being initially brought online. Longwood monitors the pressurization carefully to ensure safe return to service. Longwood runs a pig to dewater the line if it is determined necessary.
- All regulated lines are tested to substantiate maximum allowable operating pressure (MAOP) according to the requirements of 49 CFR 192 Subpart J prior to being put into service. For those lines, the pressure test lasts at least 8 hours at or above the required test pressure. Fabricated units and short sections of pipe for which a post installation test is impractical are pre-installation tested for 4 hours at or above the required test pressure. The tie-in welds are then non-destructive tested.

- Non-regulated lines are tested to substantiate MAOP prior to being put into service. For those lines, the pressure test procedure and duration are based on the guidelines of the design engineer.

3.0 CATHODIC PROTECTION, CORROSION CONTROL AND LIQUIDS MANAGEMENT

3.1 Cathodic Protection

All regulated lines are protected by cathodic protection no later than one year after being placed into service. Longwood's cathodic protection program has been created and implemented with coordination of a competent cathodic protection consulting firm. Additional non-regulated lines may also have cathodic protection as deemed necessary from consultation with an outside competent cathodic protection consultant. Longwood's pipeline system has all been constructed within the last 10 years and all new pipelines are evaluated for cathodic protection during construction.

3.1.1 Responsibility

Longwood generally utilizes a third-party contractor for all cathodic protection of both regulated and non-regulated lines. Operations provides management oversight of all third-party contractors.

3.1.2 Requirements

- For regulated lines, cathodic testing is conducted at intervals not exceeding 15 months, but at least once each calendar year. Additionally, on short sections of the pipeline (less than 100 ft) pipe to soil surveys are conducted so that 10% of the pipeline system is inspected each year and all affected sections will be inspected within 10 yrs.
- For regulated lines, each cathodic protection rectifier or other impressed current power sources are inspected at intervals not exceeding 2 ½ months, but at least six (6) times per calendar year.
- For regulated lines, each critical bond, each reverse current switch and each diode are inspected at intervals not exceeding 2 ½ months, but at least six (6) times per calendar year. Other interference bonds are inspected once per calendar year, not to exceed 15 months.
- Longwood currently does not have any non-coated, non-cathodically protected regulated pipelines. If it were to build such pipelines in the future, such pipelines

will be reevaluated once per three (3) year interval, not to exceed 39 months and where active corrosion is detected the pipelines will be cathodically protected. Evaluation of non-coated pipelines will be conducted through close interval survey (CIS), or when a CIS is impractical, through record evaluations (leak history, etc).

3.2 Chemical Treatments

3.2.1 Responsibility

Operations is responsible for the supervision of corrosion control activities including inspection and reporting requirements as specified herein.

3.2.2 Requirements

- Methanol may be periodically injected as needed to prevent gas hydrates. No other routine chemicals are injected into the pipelines.

3.3 Fluid Management

Field dehydration occurs at the compressor stations to minimize the formation of hydrates in the pipeline segments connecting the compressor stations and processing plant. Pipeline segments between the tank batteries and processing plants are pigged on a periodic basis to remove water and hydrocarbon liquids and treated with methanol as needed to prevent hydrates.

3.4 Tank Operations

Longwood does not own or operate storage tanks on the pipeline segments regulated by 19.15.28 NMAC. Longwood owns water and condensate tanks located at various compressor stations within the gathering system, and such tanks are operated in accordance with the applicable air permits associated with those stations.

4.0 PROCEDURES TO REDUCE RELEASES

4.1 Procedures to reduce Venting and Flaring During Maintenance, Emergencies and Malfunctions

4.1.1 Responsibility

Operations is responsible for pipeline maintenance and handling emergencies and malfunction events.

4.1.2 Requirements

- Longwood operates a variable pressure pipeline gathering system and in many instances has the ability to pack the pipeline in the event a compressor station or processing plant are unable to take the natural gas for a short duration. Normal operations of the pipeline gathering system does not require the need for flaring or venting of natural gas.
- Longwood uses portable flare stacks as required during pipeline blowdowns to minimizing venting.

4.2 Procedures for Reporting Scheduled Maintenance and Emergencies to Upstream Operators

4.2.1 Responsibility

Operations and Longwood's regulatory group are responsible for reporting to upstream operators in accordance with 19.15.28.8 (D) NMAC.

4.2.2 Requirements

- Longwood provides written notification to upstream operators no less than 14 days prior to the date of scheduled maintenance, replacement or repair of a natural gas gathering system. The notification includes the date and expected duration that the system will not gather natural gas.

- As soon as possible but no more than 12 hours after discovery of an emergency or malfunction, or the need for unscheduled maintenance of a natural gas gathering system, Longwood provides verbal notification to each upstream operator whose natural gas is gathered by the system of the date and expected duration that the system will not gather natural gas, and provides written confirmation of the verbal notification, including the date, time, person, and telephone number to whom verbal notification was given no later than 24 hours after discovery.
- Longwood makes and will keep a record of each notification for no less than five years and make such records available for inspection by the OCD upon request.

4.3 Emergency Response Plan

Longwood has a corporate emergency response plan to provide a systematic approach to handling emergency situations. Emergency situations can rarely be anticipated and usually require immediate action by those involved.

4.3.1 Source Elimination

Protection of the public is the primary concern during the initial stages of an emergency. This is generally accomplished by:

1. Isolation and containment,
2. Evacuation, or
3. Deliberate ignition of the leak

Upon determining that a leak has occurred the operator-on-duty does the following:

1. Isolate the emergency by closing the appropriate block valves, and
2. Initiate the applicable response, as defined in this emergency response plan.

4.3.2 Reporting to Regulatory Agencies

In the event that the person-in-charge wishes to alert additional persons to provide

assistance or to take command of the situation, Operations will be contacted to dispatch the appropriate personnel.

REGULATORY AGENCY REPORTS/TELEPHONE NUMBERS

| Agency | Number |
|------------------------------|---|
| Office of Pipeline Safety-DC | 800-424-8802 or 202-366-4595 FAX 202-366-4566 |
| Pipeline Safety Bureau | 505-476-0298 |
| NMOCD Artesia Office | 575-626-0830 |
| National Response Center | 800-424-8802 |
| OSHA | 800-321-OSHA |

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

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QUESTIONS

Action 43913

QUESTIONS

| | |
|--|---|
| Operator: Longwood RB Pipeline, LLC 5400 LBJ Freeway, Ste 1500 Dallas, TX 75240 | OGRID: 330263 |
| | Action Number: 43913 |
| | 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

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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. |
|--|---|