

H2S – 61

2012 MISC



Occidental Permian Ltd.
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November 20, 2012

Mr. Glenn Von Gonten
State of New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

RE: Hobbs Unit DRAFT H₂S Contingency Plan

Mr. Von Gonten,

Attached is the latest draft of our Hobbs H₂S Contingency Plan for the North Hobbs Unit, including the CO₂ injection operation and plant.

Since we last visited with you, Oxy has been working with the city of Hobbs and Lea county to revalidate the response methodology and other information, to include working with our internal dispersion modeling experts to revise and update the radius of exposure (ROE) calculations pursuant to NMOCD Order 6199-B.

Because they are the primary emergency responder, the Hobbs Fire Department was very involved in helping us redraft this plan and they are satisfied with the methodology described and the ROE calculations. The Plan is now ready for your review and feedback, and we sincerely appreciate any thoughts you have to help further this process. Although we are still conducting internal reviews on this draft, we are hopeful for your feedback in the next few weeks so that the final plan can be submitted in December.

Our plan is to finalize the update of the contingency plan for the existing North Hobbs Unit operation and confirm that the NMOCD is agreeable to the continued use of the PHAST dispersion modeling approach for the ROE calculations before the end of this year, and then prepare a "proposed" contingency plan that incorporates the future South Hobbs CO₂ project based on the final version of the attached contingency plan.

After the NMOCD has had a chance to review this plan, we would like to come to Santa Fe to further discuss the dispersion calculations and any comments or concerns. If convenient, we would like to schedule a meeting the week of December 3. Thanks again for your efforts to help us develop the best plan possible. Please feel free to contact me as you review the document.

Sincerely,

Kelley Albrecht Montgomery, P. E.
Regulatory Consultant
Office: 713.366.5716
Cell: 832.454.8137

.cc Rick Foppiano
Richard Ezeanyim, Chief Engineer, NMOCD
NMOCD Hobbs District Office

Hobbs Fire Department



SUPPRESSION
EMERGENCY MEDICAL SERVICES

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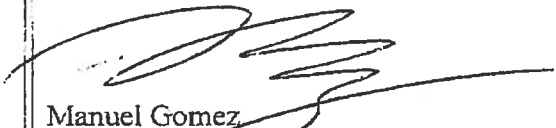
Re: Occidental Petroleum's Hobbs Unit - H₂S Contingency Plan

To whom it may concern:

This letter is to advise NMOCD of the collaboration between the Hobbs Fire Department and Occidental Petroleum (Oxy) regarding the Hobbs H₂S Contingency Plan. HFD's staff has met with Oxy on several occasions and reviewed the plan in detail including the action levels and the use of dispersion modeling (radius of exposure) to estimate areas potentially affected by an accidental release.

In my experience, Oxy has a comprehensive plan which allows for a safe and efficient response both for responders and citizens. Going forward, the City of Hobbs Fire Department is in agreement with this methodology and will continue to work with Oxy to support periodic drills, conduct training exercises specific to oil and gas operations and to maintain a robust emergency response plan.

Sincerely,



Manuel Gomez
City of Hobbs Fire Department
Fire Chief

	OXY USA HOBBS H2S CONTINGENCY PLAN				
Plan Holder	Organization	Address or Location	Number of Paper copies	Electronic Copies	Distribution Date
Glenn Vongonten	NMOCD/ Santa Fe	1220 S. St. Francis Dr. Santa Fe, NM 87505 Glenn.Vongonten@state.nm.us	1	1	12/27/2012
E.L. Gonzales	NMOCD/ Hobbs District Office	1625 N. French Dr. Hobbs NM 88240 ElidioL.Gonzales@state.nm.us	1	1	12/27/2012
Chief Manual Gomez	City of Hobbs Fire Department	301 E. White Hobbs, NM 88240 mgomez@hobbsnm.org	1	1	12/27/2012
Lorenzo Velasquez	Local Emergency Planning Committee	1923 N. Dal Paso Ste A Hobbs, NM 88240 Lvelasquez@leacounty.net	1	1	12/27/2012
Chief Chris McCall	City of Hobbs Police Department	300 N. Turner Hobbs, NM 88240 CMcCall@hobbsnm.org	1	1	12/27/2012
Raymond (Tony) Aguilar	OXY HES Hobbs	1017 W. Stanolind Rd. Hobbs, NM 88240 raymond_aguilar@oxy.com	1	1	12/27/2012
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