

State of New Mexico  
Energy, Minerals and Natural Resources Department

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**BY ELECTRONIC MAIL ONLY**

November 26, 2025

Nikunj Khelurkar  
DCP Operating Company, LP  
6900 East Layton Ave, Suite 900  
Denver, CO 80237  
[nikunj.khelurkar@p66.com](mailto:nikunj.khelurkar@p66.com)

**RE: DCP Operating Company, LP – Notice of an Administratively Complete Discharge Permit Application for the Artesia Gas Processing Plant, Eddy County, New Mexico**

Dear Mr. Khelurkar:

The New Mexico Energy, Minerals and Natural Resource Department's Oil Conservation Division (OCD) has reviewed the revised discharge permit application submitted on November 13, 2025, for DCP Operating Company, LP's (DCP) Artesia Gas Processing Plant located in Eddy County, New Mexico. OCD has determined that the amended discharge permit application is administratively complete.

Given OCD's determination, DCP must provide public notice within 30 days of receipt of this letter (i.e., December 26, 2025) in accordance with the requirements of 20.6.2.3108(B) NMAC to the general public in the locale of the Plant by each of the methods listed below:

1. Prominently posting a synopsis of the public notice at least 2 feet by 3 feet in size, in English and in Spanish, at the main entrance to the Facility and at the Artesia, New Mexico Post Office for 30 days;
2. Providing written notice of the discharge by mail or electronic mail, to owners of record of all properties within a 1/3 mile distance from the boundary of the property where the discharge site is located; if there are no properties other than properties owned by the discharger within a 1/3 mile distance from the boundary of property where the discharge site is located, DCP shall provide notice to owners of record of the next nearest adjacent properties not owned by the discharger;

1220 South St. Francis Drive, 3rd Floor ▪ Santa Fe, New Mexico 87505  
Phone (505) 476-3441 ▪ [www.emnrd.state.nm.us/oed](http://www.emnrd.state.nm.us/oed)

State of New Mexico  
Energy, Minerals and Natural Resources Department

3. Providing notice by certified mail, return receipt requested, to the owner of the discharge site if DCP is not the owner; and
4. Publishing a synopsis of the notice in English and in Spanish, in a display ad at least three inches by four inches not in the classified or legal advertisements section, in the Artesia Daily Press.

Within 15-days of completion of the public notice requirements in 20.6.2.3108(B) NMAC, DCP must submit to the OCD proof of the notice, including affidavit of mailing(s) and the list of property owner(s), proof of publication, and an affidavit of posting, as appropriate.

Also, as part of the amended discharge permit application, DCP was required to submit a Closure/Post Closure Plan for OCD approval. OCD has reviewed this plan and hereby approves the Closure/Post Closure Plan. The financial assurance (FA) associated with this plan is \$1,085,300.00. The FA must be on OCD prescribed forms, or forms otherwise acceptable to the OCD, payable to the OCD. Bond forms can be found at the bottom of OCD's Forms Page located at <https://www.emnrd.nm.gov/ocd/ocd-forms/>. The FA is due to the OCD within 30 days of email receipt of this letter (i.e., December 26, 2025).

If you have any questions, please do not hesitate to contact me by email at [joel.stone@emnrd.nm.gov](mailto:joel.stone@emnrd.nm.gov) or by phone at (505) 709-5149. On behalf of the OCD, I wish to thank you and your staff for your cooperation during this process.

Respectfully,



Joel Stone  
Senior Environmental Scientist



# APPLICATION FOR GROUNDWATER DISCHARGE PERMIT

DCP OPERATING COMPANY, LP  
ARTESIA GAS PROCESSING PLANT



SECTION 7, TOWNSHIP 18 SOUTH, RANGE 28 EAST  
Lat./Long. (NAD83): 32.75638, -104.21075

NOVEMBER 2025

Prepared For:

DCP Operating Company, LP  
2331 Citywest Blvd., N762  
Houston, TX 77042  
(832) 765-3632

Prepared By:

Geolex, Inc.<sup>®</sup>  
500 Marquette Avenue NW, Suite 1350  
Albuquerque, NM 87102  
(505) 842-8000

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## 1.0 EXECUTIVE SUMMARY

Pursuant to the New Mexico Oil Conservation Division Director's request, and on behalf of DCP Operating Company, LP (OGRID #36785), Geolex, Inc.<sup>®</sup> (Geolex) has prepared and hereby submits a complete Groundwater Discharge Plan application for the existing Artesia Gas Processing Plant (Plant). The Plant is located in Section 7, Township 18 South, Range 28 East (32.75638, -104.21075 NAD83), approximately 12 miles southeast of Artesia in Eddy County, New Mexico (Figure 1). Operations at the facility generally include compression, treatment, and processing of natural gas and natural gas liquids, and permanent disposal and sequestration of associated waste carbon dioxide (CO<sub>2</sub>) and hydrogen sulfide (H<sub>2</sub>S) gases. Processed natural gas and recovered natural gas liquids from facility operations are transmitted off site, via pipeline connections and commercial trucking, for sale to various customers. After final separation of methane from CO<sub>2</sub> and H<sub>2</sub>S, this treated acid gas (TAG) is compressed at the acid gas injection (AGI) facility located at the Plant.

The Artesia Gas Processing Plant and AGI facility are located within the Pecos River Basin in an area where local topography is relatively flat and surface elevation gently increases in the northeast direction. The facility property is underlain by Quaternary alluvium overlying Triassic redbeds and anhydrites of the Santa Rosa Formation (Dockum Group) and Guadalupian-aged Chalk Bluff Formation, all of which are local sources of groundwater. There are no bodies of existing surface water or groundwater discharge sites within one mile of the facility, however, some local playa depressions are observed, which are often crosscut by oil and gas production infrastructure, such as well pads and/or pipelines. No surface water accumulation is observed associated with these features in aerial imagery records. Local groundwater well records indicate that the shallowest observed depth to groundwater is approximately 95 feet below the ground surface. Available water quality data for groundwater wells in the vicinity of the Artesia Plant indicate that total dissolved solids concentrations in the area range from approximately 1,370 to 4,740 parts per million (ppm).

Surface soils observed in and around the Artesia Plant property are generally characterized by fine sand and loam deposits, which form alluvial fans and plains landforms. These soil units are typically well drained and exhibit varying runoff classes, from low to very high runoff potential. Within the Plant surface area, two main soil units have been mapped, including the Kimbrough Stegall Loams (KT) and Largo-Stony Land Complex (LN) (see Section 3.0, Figure 6, and Appendix A).

The risk of potential discharge of contaminants to groundwater at the DCP Artesia Plant is generally low, as facility operations do not include any intentional effluent release, except for a septic system and leach field utilized to handle facility offices and control room sewage. Potential discharges to groundwater relate primarily to liquids which are produced or utilized in facility operations, including produced water, equipment oils, natural gas liquids, precipitation, and limited chemical liquids. In all cases, these materials are temporarily stored in enclosed tanks with secondary containment systems or contained within a double-walled sump with integrated alarm systems.

There is no on-site disposal of effluent streams or solid waste, nor has there ever been, with the exception of the on-site septic system and leach field, and wastewater disposed of via an on-site saltwater disposal (SWD) well (discussed further in Section 4.0). All waste produced by gas-processing operations (effluent and solid wastes) are recovered from containment systems and transported off site, via commercial trucking services, to approved disposal and/or recycling facilities, or as applicable, disposed of via the on-site SWD well. Processed natural gas and recovered natural gas liquids are transported off site for sale to various customers, directly via pipeline and daily commercial trucking services, respectively.

The DCP Artesia Gas Processing Facility is operated and manned by DCP personnel 24 hours per day, seven days a week and visual inspections of the facility are conducted during each 12-hour operator shift,



in accordance with DCP Policies and Procedures. Piping associated with major facility processes is constructed above ground or overhead such that any failure or minor loss of integrity can be rapidly identified, corrected, and cleaned up (if necessary) during daily inspections of the facility. Furthermore, routine inspections and maintenance are performed monthly to verify the integrity of all storage and containment structures at the facility and to ensure proper disposal of all waste materials generated.

In the event of any release, DCP policy directs facility personnel to respond immediately and provide notices as required by the State of New Mexico, as described in 19.15.29 NMAC and 20.6.2.1203 NMAC.

## 2.0 ARTESIA GAS PROCESSING PLANT DESCRIPTION AND KEY INFORMATION

### NATURAL GAS PROCESSING OPERATIONS AND FACILITY DESCRIPTION

The DCP Artesia Gas Plant is a natural gas processing plant which processes up to 100 million standard cubic feet per day (MMSCFD) of field gas containing hydrogen sulfide ( $H_2S$ ) and utilizes an acid gas injection (AGI) well for the disposal and geologic sequestration of waste  $H_2S$  and carbon dioxide ( $CO_2$ ). A saltwater disposal (SWD) well is also operating on the Plant property, disposing a maximum of 1,000 barrels of facility process water per day. The Artesia Plant is located in Section 7 of Township 18 South, Range 28 East, approximately 12 miles southeast of Artesia in Eddy County, New Mexico (Figure 1). Specific coordinates for the Artesia Gas Processing Plant are 32.75638, -104.21075 (NAD83).

Primary operations at the Artesia Plant include gas compression, treatment, processing, and TAG compression and injection. Natural gas resources are gathered at the facility from oil and gas producers operating in Lea and Eddy counties, New Mexico. Once gathered at the Plant, the produced natural gas is compressed, dehydrated to remove water content, and processed to remove and recover natural gas liquids (NGLs). The processed natural gas and recovered NGLs are then sold and shipped to various customers. Figure 2 includes detailed aerial photographic imagery, which clearly shows the layout, design, and boundaries of the Plant and AGI facility.

Because the natural gas that is gathered and processed at the Artesia Plant contains  $H_2S$  ("sour gas"), facility operations include the use of amine treatment processes to remove  $H_2S$ ,  $CO_2$ , and other impurities from the natural gas stream. Once isolated, via amine treatment,  $H_2S$  and  $CO_2$  waste gases are compressed utilizing electric driven, reciprocating compressors and transmitted to one AGI well located on the property, which permanently disposes of the material in deep subsurface geologic reservoirs.

## OPERATION OF THE FACILITY, LOCATION, AND KEY PERSONNEL

The Artesia Gas Processing Plant and associated AGI well is operated by DCP Operating Company, LP (OGRID #36785). Relevant facility and operator information is generally summarized below:

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Facility Operator:	DCP Operating Company, LP (OGRID #36785)		
Operator Address:	2331 Citywest Blvd., N762; Houston, TX 77042		
NMOCD Facility ID:	fJMW1320639360		
Surface Landowner:	Private		
Primary Contact:	Nikunj Khelurkar	<a href="mailto:Nikunj.Khelurkar@p66.com">Nikunj.Khelurkar@p66.com</a>	432-241-5848
Secondary Contact:	Raymond Smalts	<a href="mailto:Raymond.A.Smalts@p66.com">Raymond.A.Smalts@p66.com</a>	575-677-5225

### Artesia Gas Plant Location Information:

Legal Location: Section 7 of Township 18 South, Range 28 East (UL: O, P)  
Lat./Long (NAD83): 32.75638, -104.21075  
Address: Illinois Camp Rd, Artesia, NM 88210

Directions to Facility: From Hobbs, New Mexico (intersection of Turner St. and Marland St.), travel west on NM Hwy 62 (Marland St./Hobbs Hwy) for approximately 14.4 miles. Take a slight right on to NM-529 and continue for approximately 31.1 miles. Turn left (west) on US Hwy 82 and continue for 18.9 miles. Turn left (south) on Illinois Camp Rd and continue approximately 3 miles to facility (on right).

## 3.0 ARTESIA GAS PROCESSING PLANT SITE CHARACTERISTICS

The Artesia Gas Processing Plant is located within the Pecos River Basin in an area referred to as the Mescalero Pediment (Hendrickson & Jones, 1952). The local topography is relatively flat and largely covered by sand dunes underlain by a hard caliche surface. The dune sands are locally stabilized with shin oak, mesquite, and some burr grass. There are no natural surface bodies of water or groundwater discharge sites within one mile of the Plant. Where drainages exist in interdunal areas, they are ephemeral, discontinuous, dry washes. Lacustrine environments are located southwest of the facility and are separated by approximately 15 miles and 300 feet of elevation.

The facility location is underlain by Quaternary alluvium overlying Triassic Redbeds of the Dockum Group and Guadalupian-aged Chalk Bluff Formation, all of which are local sources of groundwater with total dissolved solids (TDS) ranging from approximately 1,730 to 4,740 mg/l.

Figure 3 illustrates the surface topography in the area of the DCP Artesia Gas Plant, which is relatively flat, decreasing in ground level elevation toward the southwest. The approximate ground level elevation on the plant property is 3,600 feet above sea level. According to the national Flood Hazard Layer provided by FEMA, the flood risk for the Plant is within an area of minimal flood hazard (Zone X), as illustrated in Figure 4. The flood zone is defined as being outside the 500-year flood zone and protected from 100-year flood events. Observations at the DCP Artesia Facility confirm FEMA flood risk interpretations, as flooding, ponding, or pooling is not common for the facility during infrequent local precipitation events.



## GROUNDWATER HYDROLOGY IN THE VICINITY OF THE ARTESIA GAS PROCESSING PLANT

Based on the New Mexico Water Rights Database from the New Mexico Office of the State Engineer, there are three (3) freshwater wells located within an approximate one-mile radius of the Artesia Plant, the closest of which is located approximately 0.39 miles from the facility. All wells within the area are shallow, collecting water from depth intervals between 95 to 300 feet in the geologic interval of the Chalk Bluff Formation or Triassic redbeds. Records indicate that the shallowest depth to groundwater observed is at a depth of approximately 95 feet below the ground surface; this is the closest well with the shallowest recorded depth to groundwater and is located approximately 2.55 miles to the northeast of the plant. Information for this well has been included in Table 1 below. All groundwater wells within a one-mile radius, centered on the Artesia Gas Processing Facility, are summarized in Table 1 below and illustrated in Figure 5 of this report.

Table 1. Water wells within approximately one mile of the Artesia Gas Processing Plant (retrieved from the New Mexico Office of the State Engineer records)

POD #	Owner	Use	UTM E	UTM N	Total Depth (ft)	Water Depth (ft)	Dist. From Plant Center (mi)
RA 08237	Bogle Farms	Livestock Watering	574557	3624563	-	-	0.398
RA 08236	Bogle Farms	Livestock Watering	574557	3624563	-	-	0.398
RA 08235	Bogle Farms	Livestock Watering	573537	3625134	-	-	0.419
RA-11857-POD1	Jessie Verdugo	Domestic & Livestock Watering	577784	3625988	235	95	2.550

The area surrounding the DCP facility is arid and there are no bodies of existing surface water within a one-mile radius. While there are no existing bodies of water, some local playa depressions are observed, which are often crosscut by oil and gas production infrastructure, such as well pads and/or pipelines. No surface water accumulation is observed associated with these features in aerial imagery records.

Geolex conducted a review of *Geology and Ground-Water Resources of Eddy County, New Mexico* (Hendrickson & Jones, 1952) to identify published groundwater data representative of nearby water wells in the area of the DCP Artesia Gas Processing Facility. Table 2 summarizes the wells identified in this review and the results of those analyses.

Table 2. Chemical analysis results of samples collected from water wells in the area of the DCP Artesia Gas Plant (Hendrickson & Jones, 1952 – *Geology and Groundwater Resources in Eddy County, NM*)

Location (T-R-S)	Aquifer	Depth (ft)	Ca (ppm)	Mg (ppm)	Na+K (ppm)	HCO <sub>3</sub> (ppm)	SO <sub>4</sub> (ppm)	Cl (ppm)	NO <sub>3</sub> (ppm)	TDS mg/l
17-27-11	Chalk Bluff	-	616	118	25	185	1780	33	31	2690
17-28-14	Chalk Bluff	-	660	161	393	150	1810	815	8.2	3920
18-29-24	Dockum	-	397	58	43	167	911	110	98	1730
19-28-2	Rustler	160	412	195	987	142	1300	1770	11	4740

While there are no groundwater wells on the facility property for which sample analyses can be retrieved, historical records indicate that total dissolved solid concentrations in the general area of the DCP Artesia Facility range from 1,730 to 4,740 ppm (Table 2). These concentrations are in general agreement with groundwater TDS concentrations, as documented by U.S.G.S. Water Science Center records for Eddy County, New Mexico, which document an average TDS value of 2,690 ppm for shallow alluvium, Chalk Bluff, and Santa Rosa groundwater resources (National Water Quality Monitoring Council, retrieved on August 21, 2023).

## SURFACE GEOLOGY AND SOIL TYPES OF THE FACILITY AND SURROUNDING LAND

As documented in the Natural Resources Conservation Service (USDA) Soil Survey records, two main soil units characterize the Plant property and surrounding areas adjacent to the property. These include the Kimbrough Stegall Loams (KT) and the Largo-Stony Land Complex (LN). Generally, well-drained fine sand deposits characterize the surficial sediments of the Plant property and adjacent surface lands. Figure 6 illustrates soil units that characterize the surface lands in the area of the Artesia Gas Plant and characteristics of each soil unit are summarized in the following Table 3. Detailed map unit descriptions for each soil unit are also included in Appendix A.

Table 3. Summary of soil characteristics for the mapped soil units in the area of the DCP Artesia Gas Plant

Soil Unit	Landform	Profile	Drainage Class	Runoff Class	Ksat	Max. Salinity	Depth to Restrictive Layer
Kimbrough Stegall Loams (KT)	Plains, alluvial fans	A) Loam: 0-3" B) Loam: 3-9" C) Indurated 9-60"	Well drained	Very high	Very Low (0-0.06"/hr)	Nonsaline (0-2 mmhos/cm)	20-40 inches
Largo-Stony land complex (LN)	Plains, alluvial fans	A) Loam: 0-4" B) silt loam: 4-47" C) Loam: 47-65"	Well drained	Low	Mod-High 0.2-0.6/hr	Nonsaline (0-2 mmhos/cm)	>80 inches

## 4.0 POTENTIAL AND INTENTIONAL DISCHARGES AT THE FACILITY

Gas processing operations at the DCP Artesia Gas Plant do not require or include intentional discharge of effluent, except for a septic system and leach field incorporated to handle purely domestic sewage from on-site offices. The Plant facility and operations have included specific design considerations to prevent potential discharges to groundwater from the on-site storage and transfer of liquid products and wastes, which, if not properly addressed may represent potential discharges to groundwater. On-site storage of liquids is generally characterized by low volumes of produced water and wastewater, various equipment oils, hydrocarbon condensate liquids, precipitation, and limited chemical liquids required for site operations (e.g., methanol, glycol, amine solution). While the storage, loading and unloading of these materials may represent potential discharge sources, these liquids are all contained on site in appropriate, suitable vessels with secondary containment. There are not, and have never been, any impoundments or open storage or retention of liquid or solid waste material which would present a potential threat to groundwater resources.

Product and waste storage vessels at the DCP facility are either:

- (1) elevated and fully visible,
- (2) elevated and placed in secondary containment structures,
- (3) placed above ground and within secondary containment (on skids that drain to a sump, or within separate containment structures),
- (4) above ground and not contained (raw water or RO water only), or
- (5) below ground surface in containment and monitored by sensors and sump systems.

All effluent and solid waste relating to facility processing operations are stored in enclosed tanks, with secondary containment, or double-walled sumps with high level alarms. All piping that transports potential effluent streams between facility process units are located above ground or overhead, such that any leak or loss of integrity will be identified immediately.

Figure 7 includes a detailed map of the DCP Artesia Gas Processing Plant, which has been annotated to describe general locations on the property in which fluids are stored via containment and sump systems, storage tanks and surge tanks, or other suitable storage systems. The details of these locations, including fluid contained, general composition, volumes, and other relevant information are summarized in Table 4 below.

Table 4. Summary description of fluids and containment systems present on the DCP Gas Processing Plant property. Map location numbers listed correspond to annotated locations found on Figure 7.

Map Location	Description	Material	Max. Volume (gal)	Contents	Secondary Containment?	Setting
01	SV-18.37 R/O Storage Tank	Fiberglass	21,000	Fresh Water	No	above ground
01	SV-18.38 R/O Storage Tank	Fiberglass	21,000	Fresh Water	No	above ground
02	SV-18.01 Raw Water Tank (east)	Steel (welded)	200,000	Fresh Water	No	above ground
02	SV-18.12 Raw Water Tank (west)	Steel (welded)	200,000	Fresh Water	No	above ground
05	PV-16.300 Amine Contractor Inlet Scrubber	Carbon Steel	2,200	42% Amine (DG)	No	above ground
05	FC-21.52 Amine Contr. Inlet Filter Coalescer	Carbon Steel	650	42% Amine (DG)	No	above ground
05	PV-16.33 HP Amine Contractor	Carbon Steel	12,000	42% Amine (DG)	No	above ground
07	PV-16.36 Glycol Contractor	Carbon Steel	3,800	Glycol	No	above ground
07	HE-15.26.1 Glycol Exchanger	Carbon Steel	145	Glycol	No	above ground
07	FC-21.105 (ER) Glycol OH Filter Coalescer	Carbon Steel	400	Glycol	No	above ground
08	FC-21.21 Glycol Pre-filter / Separator (top)	Carbon Steel	325	Glycol	No	above ground
08	FC-21.21 Glycol Pre-filter / Separator (btm)	Carbon Steel	150	Glycol	No	above ground
09	PV-16.34 HP Amine Contr. Outlet Scrubber	Carbon Steel	1,500	42% Amine (DG)	Yes (conc.)	above ground
10	PV-16.35 Rich Amine Flash Tank	Carbon Steel	9,750	42% Amine (DG)	No	above ground
10	HE-15.02A Lean-Rich Amine Exchanger (top)	Carbon Steel	450	42% Amine (DG)	No	above ground
10	HE-15.02B Lean-Rich Amine Exchanger (btm)	Carbon Steel	450	42% Amine (DG)	No	above ground
10	PC-21.20 Rich Amine Filter	Carbon Steel	250	42% Amine (DG)	No	above ground
10	PV-16.04 Amine Still	Carbon Steel	20,000	42% Amine (DG)	No	above ground
10	HE-15.03 Amine Still Reboiler	Carbon Steel	4,400	42% Amine (DG)	No	above ground
10	PV-16.05 Reboiler Condensate Pot	Carbon Steel	200	Condensate	No	above ground
10	SV-18.07 Amine Storage Tank		3,600	42% Amine (DG)	Yes (earth)	above ground
10	HE-15.01 Lean Amine Cooler	Carbon Steel	1,400	42% Amine (DG)	No	above ground
10	FC-21.101 Amine Filter	Carbon Steel	50	42% Amine (DG)	No	above ground
10	FC-21.24 Amine Charcoal Filter	Carbon Steel	1,000	42% Amine (DG)	No	above ground

10	PV-16.03 Amine Surge Tank	Carbon Steel	15,500	42% Amine (DG)	No	above ground
10	PV-16.038 Regen Gas Amine Contractor	Carbon Steel	8,500	42% Amine (DG)	No	above ground
11	PV-16.24 Inlet Gas Separator	Carbon Steel	1,500	Condensate	No	above ground
12	PV-16.07 NGL Surge Tank (west)	Carbon Steel	26,000	NGL	No	above ground
12	PV-16.08 NGL Surge Tank (middle)	Carbon Steel	26,000	NGL	No	above ground
12	PV-16.09 NGL Product Surge Tank (east)	Carbon Steel	26,000	NGL	No	above ground
12	PV-16.10 NGL Product Surge Tank (east #2)	Carbon Steel	26,000	NGL	No	above ground
12	PV-16.114 Propane Tank (west)	Carbon Steel	9,000	Propane	No	above ground
12	PV-16.115 Propane Tank (east)	Carbon Steel	4,000	Propane	No	above ground
12	PV-16.113 Boiler Feed Water Surge Tank	Carbon Steel	11,000	Water	No	above ground
12	PV-16.120 Fuel Gas Vol. Pot for Boilers (south)	Carbon Steel	100	Condensate	No	above ground
12	FC-21.40 Fuel Gas Filter / Sep. #1 (top / btm)	Carbon Steel	17	Condensate	No	above ground
12	FC-21.40 Fuel Gas Filter / Sep. #2 (top / btm)	Carbon Steel	17	Condensate	No	above ground
12	FC-21.40 Fuel Gas Filter / Sep. #3 (top / btm)	Carbon Steel	17	Condensate	No	above ground
12	FC-21.40 Fuel Gas Filter / Sep. #4 (top / btm)	Carbon Steel	17	Condensate	No	above ground
12	FC-21.40 Fuel Gas Filter / Sep. #5 (top / btm)	Carbon Steel	17	Condensate	No	above ground
13	HE-15.31R(A) Inlet Gas Cooler	Carbon Steel	700	Condensate	No	above ground
13	HE-15.31R(B) Inlet Gas Cooler	Carbon Steel	700	Condensate	No	above ground
13	FC-21.108B Dust Filter (west)	Carbon Steel	125	Condensate	No	above ground
13	FC-21.108A Dust Filter (east)	Carbon Steel	125	Condensate	No	above ground
13	HE-15.30 Inlet Gas / Product Exchanger	Carbon Steel	275	Condensate	No	above ground
13	HE-15.11 Reboiler	Carbon Steel	900	Methanol	No	above ground
14	FC-21.107 Dehy. Inlet Filter Coalescer	Carbon Steel	400	Condensate	Skid	above ground
14	FC-16.12 Dehydrator (east)	Carbon Steel	2,200	Condensate	Skid	above ground
14	FC-16.11 Dehydrator (middle)	Carbon Steel	2,200	Condensate	Skid	above ground
14	FC-16.103 Dehydrator (west)	Carbon Steel	2,200	Condensate	Skid	above ground
14	SV-18.17 Jacket Water Storage Tank	Carbon Steel	16,285	Glycol	Yes (earth)	above ground
14	SV-18.18 Methanol Storage Tank (AGI)	Carbon Steel	16,285	Methanol	Yes (earth)	above ground

15	PV-16.13 Refrigeration Gas Separator	Carbon Steel	100	Condensate	No	above ground
16	SV-18.350 AGI Comp. Drain Sump	Fiberglass	500	Waste oil / water	Double Wall	Partially Buried
16	SV-18.350B AGI Comp. Drain Sump	Fiberglass	650	Waste oil / water	Double Wall	Partially Buried
16	PM-18.03 AGI Comp. Coolant Drain Tank	Carbon Steel	1,000	Coolant	No	Underground
16	SV-18.05 Oily Waste Tank		1,000	Oily Waste	No	Underground
16	SV-18.115 Recompressor Room Oil Day Tank	Carbon Steel	300	Lube Oil	Yes (conc.)	above ground
18	SV-18.16 Lube Oil Storage Tank (north)	Carbon Steel	9,000	Lube Oil	Yes (conc.)	above ground
19	SV-18.116 Inlet Comp. Lube Oil Tank #1	Carbon Steel	8,900	Lube Oil	Yes (conc.)	above ground
20	SV-18.113 Jacket Water Drain Tank	Carbon Steel	500	Jacket Water	Yes (conc.)	above ground
20	SV-18.114 Jacket Water Day Tank	Carbon Steel	500	Jacket Water	Yes (conc.)	above ground
20	SV-18.112 Inlet Comp. Lube Oil Day Tank	Carbon Steel	500	Lube Oil	No	above ground
20	SV-18.117 Cat Oil/Water Drain Tank	Carbon Steel	500	Oily Waste	Yes (conc.)	above ground
24	SV-18.25 Produced Water Tank (north)	Carbon Steel	10,500	Produced Water	Yes (metal)	above ground
24	SV-18.26 Produced Water Tank (south)	Carbon Steel	10,500	Produced Water	Yes (metal)	above ground
25	PV-16.302A HP Inlet Slug Catcher (west)	Carbon Steel	18,000	Condensate	No	above ground
25	PV-16.302B HP Inlet Slug Catcher (east)	Carbon Steel	18,000	NGL	No	above ground
26	FC-21.106A Stabilizer Liq. Feed Filter (east)	Carbon Steel	45	Condensate	No	above ground
26	FC-21.106B Stabilizer Liq. Feed Filter (west)	Carbon Steel	45	Condensate	No	above ground
27	PV-16.31 LP Inlet Gas Receiver	Carbon Steel	5,000	Condensate	No	above ground
27	PV-16.32 LP Inlet Gas Rec. Blowcase	Carbon Steel	100	Condensate	No	above ground
27	PV-16.373 LP Inlet Slug Catcher	Carbon Steel	15,000	Condensate	No	above ground
28	PV-16.195 Stabilized Condensate Stg. Tank	Carbon Steel	34,000	Condensate	Yes (metal)	above ground
29	SV-18.45 Gun Barrel Tank	Carbon Steel	16,800	Waste Oil / Water	Yes (metal)	above ground
29	SV-18.48 Disposal Delivery Overflow Tank	Carbon Steel	42,000	Waste Water	Yes (metal)	above ground
29	SV-18.49 Disposal Delivery Overflow Tank	Carbon Steel	42,000	Waste Water	Yes (metal)	above ground
29	SV-18.46 Waste Water Tank #1	Carbon Steel	31,500	Waste Water	Yes (metal)	above ground
29	SV-18.47 Waste Water Tank #2	Carbon Steel	31,500	Waste Water	Yes (metal)	above ground
30	SV-18.42 Waste Water Disposal Skim Tank	Carbon Steel	8,400	Waste Oil / Water	Yes (conc.)	above ground
30	SV-18.43 Waste Water Disposal Skim Tank	Carbon Steel	8,400	Waste Oil / Water	Yes (conc.)	above ground

30	SV-18.44 Waste Water Disposal Skim Tank	Carbon Steel	8,400	Waste Oil / Water	Yes (conc.)	above ground
31	SV-18.33 Slop Oil / Water Tank	Carbon Steel	16,800	Waste Oil / Water	No	above ground
31	SV-18.34 Slop Overflow Tank	Carbon Steel	3,780	Waste Oil / Water	No	above ground
31	SV-18.31A Unloading Tank (west)	Carbon Steel	21,000	Waste Oil / Water	No	above ground
31	SV-18.31B Unloading Tank (east)	Carbon Steel	21,000	Waste Oil / Water	No	above ground
31	SV-18.32 Unloading Tank (south)	Carbon Steel	21,000	Waste Oil / Water	No	above ground
31	PV-16.403 Slop Treat Free Water Knockout	Carbon Steel	2,300	Waste Oil / Water	No	above ground
31	PV-16.404 Slop Treat Heater Treater	Carbon Steel	3,300	Waste Oil / Water	No	above ground
31	PV-16.501 Slop Treat Suction Scrubber	Carbon Steel	70	Condensate	No	above ground
34	PV-16.196 Produced Water Flash Tank	Carbon Steel	500	Produced Water	Yes (metal)	above ground
37	HE-15.210 Cross Exchanger	Carbon Steel	650	Condensate	No	above ground
37	PV-16.374 HP Comp. Discharge Scrubber	Carbon Steel	1,200	Condensate	No	above ground
38	FC-21.22 Glycol Filter (south)	Carbon Steel	50	Glycol	No	above ground
38	FC-21.23 Glycol Filter (north)	Carbon Steel	50	Glycol	No	above ground
38	HE-15.29A Glycol Reboiler	Carbon Steel	750	Glycol	No	above ground
38	HE-15.29B Glycol Surge Tank	Carbon Steel	625	Glycol	No	above ground
38	PV-16.111 Glycol Flash Tank	Carbon Steel	450	Glycol	No	above ground
38	SV-18.09 Glycol Storage Tank (west)		500	Glycol	No	above ground
38	SV-18.10 Glycol Storage Tank (east)		500	Glycol	No	above ground
38	PV-16.39 Glycol Vap. Rec. Suction Scrubber	Carbon Steel	30	Glycol	No	above ground
38	HE-15.24 Cooling Gas Cooler	Carbon Steel	70	Condensate	No	above ground
39	PV-16.17 Demethanizer	Carbon Steel	8,500	Methanol	No	above ground
39	HE-15.13 Demethanizer Side Reboiler	Carbon Steel	300	Methanol	No	above ground
39	HE-15.209 Cold Side Reboiler	Carbon Steel	150	Methanol	No	above ground
39	PV-16.14 HP Separator	Carbon Steel	1,100	Condensate	No	above ground
39	PV-16.201 Absorber	Carbon Steel	5,500	Methanol	No	above ground
39	FC-21.110 Fuel Gas Filter Coalescer	Carbon Steel	100	Condensate	No	above ground
39	HE-15.32 Residue Gas Cooler	Carbon Steel	650	Condensate	No	above ground
39	FC-21.53 Residue Gas Filter / Coalescer	Carbon Steel	575	Condensate	No	above ground
39	PV-16.37 Stabilizer Feed Tank	Carbon Steel	8,900	Condensate	No	above ground
39	PV-16.109 Stabilizer	Carbon Steel	4,000	Condensate	No	above ground
39	HE-15.28 Stabilizer Reboiler	Carbon Steel	900	Condensate	No	above ground



39	PV-16.110 Stabilizer Condensate Pot	Carbon Steel	150	Condensate	No	above ground
40	SV-18.15 Used Oil Storage Tank (west)		210	Oil	Yes (earth)	above ground

In addition to the itemized containment described in Table 4, operations at the DCP Artesia Gas Processing Plant require maintaining a limited stock of additional chemical liquids, which are necessary for the processing operations at the facility. A summary of these materials is provided in Table 5.

Table 5. Additional chemical liquids stored at the DCP Artesia Facility. Note, all additional materials are stored near process units for which they are utilized, and design considerations include secondary containment measures.

Map Location	Description	Material	Max Volume (gal)	Contents	Secondary Containment?	Setting
03	Boiler Water Chemical Tank (south)	Steel (green)	400	Boiler House Chemicals	Yes (brick)	above ground
03	Boiler Water Chemical Tank (center)	Steel (green)	400	Boiler House Chemicals	Yes (brick)	above ground
03	Boiler Water Chemical Tank (north)	Steel (green)	400	Boiler House Chemicals	Yes (brick)	above ground
03	Supply Water for Boiler System	Fiberglass	12,000	Fresh Water	No	above ground
06	Glycol Tank	Steel (white)	500	Triethylene Glycol	Yes	above ground
06	Glycol Tank	Steel (white)	500	Triethylene Glycol	Yes	above ground
06	Glycol Tank	Steel (white)	600	Triethylene Glycol	Yes	above ground
06	Drums (6) Unknown	Plastic (black)	330	Unknown	No	above ground
06	Drum (1) Unknown	Plastic (blue)	55	Unknown	Yes	above ground
13	Chemical Storage Tank	Plastic	650	Unknown	Yes	above ground
13	Reinforced Chemical Storage Tank	Plastic	300	Unknown	Yes	above ground
16	Elevated (insulated) Tank at AGI Comp.	Unknown	500	Unknown	Yes	above ground
17	Elevated Antifreeze Tank at AGI Comp.	Steel	500	Antifreeze	Yes	above ground
17	Elevated Lube Oil Tank at AGI Comp.	Steel	500	Lube Oil	Yes	above ground
20	Chemical Storage Area (multiple)	Plastic	1,000+	Varies	Yes	above ground
21	Elevated Antifreeze Tank	Steel	500	Antifreeze	Yes	above ground
22	Chemical Tank	Plastic	600	Flam. / Corr.	Yes	above ground
23	Antifreeze Tank	Steel	600	Antifreeze	Yes	above ground
25	HP Dump Tank	Plastic	1,000	HP Dump	Yes	above ground
26	Methanol Tank	Steel	500	Methanol	No	above ground
30	Chemical Tank	Plastic	200	Unknown	Yes	above ground
32	Corrosion Inhibitor Chemical Tank	Plastic	600	Anti-Corr. Chem.	Yes	above ground
32	Corrosion Inhibitor Chemical Tank	Plastic	600	Methanol	Yes	above ground
32	Chemical Tank	Plastic	200	Unk. (empty)	Yes	above ground
32	Drum	Metal	55	Unknown	Yes	above ground
33	Corrosion Inhibitor Chemical Tank	Plastic	600	Corrosion Inhibitor	Yes	above ground
33	Chemical Tank	Plastic	600	Methanol	Yes	above ground
35	Chemical Tanks (4)	Plastic	2,000	Bleach	Yes	above ground
35	Drum Storage	Metal	--	Molsiv Adsorbents	No	above ground

36	Elevated Fuel Tank	Steel	500	Red Diesel	Yes	above ground
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In handling all waste effluent streams and solid waste, disposal methods include collection of the materials from facility containment and sump systems and trucking off site to approved disposal facilities. There is no open retention of solid waste materials on site, and precipitation contacting processing equipment is collected by associated containment structures and trucked off site for disposal. NGL products are trucked off site, daily, and are sold. All chemical stocks required for facility operations are stored in suitable secondary containment structures.

Domestic sewage effluent from the facility offices and control room and wastewater injection via an existing SWD well represents the only on-site disposal of waste occurring at the Artesia Facility. Sewage effluent from Plant buildings is received by an adjacent septic system including tank and leach field, which are all contained within the facility property boundaries. Wastewater from the DCP Artesia plant is routed to the on-site saltwater disposal well, the Artesia SWD #1 well (API: 30-015-25271). The well was originally drilled by the Phillips Petroleum Company, in 1985, and was most recently transferred to DCP Midstream Operating, LP, in 2017. Prior to this recent transfer of operatorship, the well was operated by related companies DCP Midstream, LP, and Duke Energy Field Services, LP. The well is authorized to inject into the San Andres, Glorieta, and Yeso geologic formations at operating pressures up to a maximum of 810 psig. The well was constructed with two strings of telescoping casing in order to provide physical barriers that separate injection fluid from adjacent geologic strata. In the event of prolonged downtime of the SWD well, DCP will temporarily coordinate 3<sup>rd</sup>-party trucking and off-site disposal of wastewater commonly disposed of via the on-site SWD well. All waste will be disposed of at appropriate and approved disposal facilities.

As described previously, all effluent and solid wastes associated with facility process units are stored in enclosed tanks with secondary containment or double-walled sumps with high level alarms. With the exception of sewage effluent from facility offices, which utilize a septic system, all other facility effluent and wastes are collected and disposed of via the onsite saltwater disposal well or transported off site for proper disposal.

Surface topography on the Artesia Plant Property and greater project area is generally flat, sloping slightly toward the southwest direction (Figure 3). The approximate slope of the ground surface on the property is 0.24° (approx. 0.004 ft./ft.) and elevation gently declines toward the southwest. Any stormwater runoff that remains on the Facility grounds is managed by a sump system. Additionally, berms and/or concrete containment structures are utilized near storage tanks to prevent stormwater intrusion and the accumulation of stormwater near containment structures. Stormwater falling on containment structures or process units are collected via the facility sump systems and are transported and disposed of as described above.

## 5.0 FACILITY COLLECTION AND STORAGE SYSTEMS

A comprehensive summary of on-site vessels, containment structures, and associated liquids is provided in Table 4, and Figure 7 illustrates the location of such equipment and process areas.

The risk for potential discharges to groundwater at the DCP Artesia Facility relates primarily to volumes of produced water and NGLs generated from gas-processing operations at the facility. For salable NGLs, commercial trucking services are utilized for transportation offsite and are sold to consumers. As necessary, produced water and other facility-related liquid wastes are either transported off site, via commercial trucking services, to approved waste-disposal facilities, or more commonly, disposed of via the on-site SWD well approved for operation by NMOCD Order SWD-1564.

With the general exception of large slug catchers and surge tanks, all vessels containing liquid materials include secondary containment design considerations. Facility design considerations include six (6) sump systems which are below ground containment structures and include sensors to monitor conditions and activate alarms, via the facility control system. All other vessels and liquid storage areas are constructed above ground or are elevated and fully visible for routine inspection purposes.

All piping at the Artesia Plant with the potential for contaminant discharge to groundwater has been constructed above the ground surface or overhead, such that any failure or minor loss of integrity (leak) can be rapidly identified, and appropriate response procedures can be implemented. Furthermore, due to the throughput nature of operations at the facility, effluent transmission operations within the DCP facility are continually monitored and integrated into Plant control systems. Buried piping on the facility property is limited to flowlines to the sump systems, freshwater transmission, and the septic treatment system located adjacent to the facility control room.

## **6.0 INSPECTION, MAINTENANCE, AND REPORTING**

Operations at the DCP Artesia Processing Facility include 24-hour manned operation. Visual inspection of operating equipment and containment structures is completed during each 12-hour operator shift, in accordance with DCP facility procedures. Additionally, routine inspection and required maintenance is performed monthly to verify the integrity of all storage and containment structures, identify any potential indications of material degradation, and ensure the proper disposal of all waste materials. Operator rounds are tracked using Field Data Capture (FDC), a Microsoft application created by DCP, as well as Annual Tank and Berm Inspection spreadsheet. Hard copies of inspection reports are reviewed and retained at the Plant office. Any anomalous conditions or areas of concern identified in daily inspections are immediately reported and addressed to ensure timely resolution. All inspection and maintenance records are retained by DCP for at least five years, pursuant to the requirements of 20.6.2.3107.A(7) NMAC.

## **7.0 PROPOSED MODIFICATIONS**

The Plan described in this document reflects the initial application of DCP Operating Company, LP to attain approval of a Groundwater Discharge Plan for the Artesia Gas Processing Facility. As such, no proposed modifications to the Plan or facility operations are proposed.

## **8.0 CONTINGENCY PLAN FOR RELEASE EVENTS**

DCP Operating Company, LP responds to all release events in accordance with the requirements of the State of New Mexico, as described in 19.15.29 NMAC and 20.6.2.1203. Described below is an organized general summary of actions that will be taken by DCP in responding to a release event, remediating the impacts of release, and reaching closure for an event at the Artesia Gas Processing Facility. Furthermore, DCP facility design considerations and personnel training practices aim to significantly reduce the potential for release events by implementing practices and engineering controls intended to prevent release events before they happen. These practices include, but are not limited to, routine inspection protocols, operator training programs, operations monitoring and automated controls for emergency shutdown and facility isolation protocols, and engineered containment structures around process units and areas, all of which aid in minimizing the potential for release events at the DCP Artesia Facility.

While engineering controls and operator training aid in minimizing environmental risk, clear protocols for responding to a release event remain necessary and have been implemented at the Artesia Gas Processing Facility. Key elements of the contingency plan and response procedures generally include the rapid identification of a release event and immediate action to prevent further release, containment and recovery of any materials released, and notification and reporting to any and all interested parties, including, but not limited to, relevant state and federal agencies, nearby residents and persons in close proximity to the release event, relevant adjacent operators, and DCP management and supervisory personnel. In the following sections, we provide a brief overview of the contingency plan response and remediation actions following a release event.

#### RELEASE IDENTIFICATION AND IMMEDIATE ACTIONS

In the event a release is identified via routine facility inspection, operations monitoring, or by reports of facility personnel or another third party, immediate action will be taken to intervene and minimize the potential for environmental impact. As applicable, and if deemed safe to do so, responding personnel will take appropriate measures to stop the source of the release, via process shutdown, isolation, or other appropriate measures. In the event responding personnel are unable to stop the release, appropriate operations and/or supervisory personnel will be contacted immediately to effect appropriate intervention methods and/or facility shutdown protocols. Under all circumstances, access to the area of release will be controlled and limited to response personnel and all non-essential personnel will be advised to evacuate the area of release.

As necessary, and depending on the nature of a potential release, materials such as berms, dikes, liners, or absorbent pads may be utilized to contain materials released. If necessary, additional earthen dams or pits may be constructed to contain released materials in the event existing topographic features provide less desirable containment for released material. All materials capable of recovery (i.e., via vacuum truck or similar equipment) will be collected and removed from the surface to mitigate and/or prevent seepage of potential contaminant substances to soil and/or groundwater. All recovered materials will be removed from the facility and sent to an appropriate waste disposal facility. Once appropriate actions have been taken to stop the source of the release and recover any released materials present on the surface, notification to all relevant parties (e.g., NMOCD, EPA, etc., as applicable) will be made to ensure the circumstances of the release are appropriately documented and that an appropriate plan is developed to evaluate potential impacts to the site and to determine the need, if any, for further remedial action.

#### ASSESSMENT AND REMEDIATION FOLLOWING A RELEASE

Upon successful intervention and response to a release event, and in accordance with a plan-of-action agreed upon by DCP and relevant regulatory authorities, a site assessment will be completed to investigate and characterize the impact of any such release event. Depending on the nature of the release, this assessment may include vertical and horizontal delineation of the area of soils impacted by the release (i.e., via soil sampling and laboratory analysis). From this characterization, map resources illustrating the release area and locations of soil sample collection and analysis will be prepared, along with estimations of the volume of impacted material at the facility. DCP will prepare and submit to all relevant parties (i.e., NMOCD) a complete report of the findings of this sampling and contaminant delineation analysis, which will include a proposed remediation strategy and preliminary schedule for remediation activities. Once approved by all relevant agencies, remediation activities will commence as quickly as possible to prevent any potential impacts to soil or to groundwater via seepage from impacted materials. All remediation activities will be completed such that they meet the performance criteria of the agency-approved workplan and/or closure criteria as defined in 19.15.29 NMAC, such that final reclamation of the site and re-establishment of vegetation can be successful upon any future closure of the Artesia Gas Processing Facility.

## 9.0 PUBLIC NOTICE

In submitting this Groundwater Discharge Permit Application for review, DCP acknowledges that the application is subject to public notice requirements of WQCC 20.6.2.3108 NMAC. Within 30 days of the New Mexico Oil Conservation Division determination that the application is administratively complete, DCP shall provide notice to the general public in the locale of the facility, pursuant to the requirements of WQCC 20.6.2.3108(B) NMAC. After the NMOCD determines that this Application is administratively complete, written notice of this Application will be displayed for 30 days at the main entrance to the Facility and in the local post office. Similarly, notice of this application will be published in the locally circulated newspaper, the Artesia Daily Press, and any landowners within one-third of a mile from the Facility boundary shall be notified of this Application via USPS. Proof of publication and correspondence with nearby landowners will be provided to NMOCD within 15 days of completion. See Appendix B for an example of the public notice letter and newspaper publication that will be issued following NMOCD's determination that this application is administratively complete.

All public notices provided will include all relevant information, as described in WQCC 20.6.2.3108(F) NMAC, including:

1. The name and address of the applicant for approval of a discharge plan;
2. The location of the potential discharge, including a street address, if available, and sufficient information to locate the facility with respect to surrounding landmarks;
3. A brief description of the activities that produce the potential discharge described in the application;
4. A brief description of the expected quality and volume of any actual or potential discharge;
5. The depth to and total dissolved solids concentration of the ground water most likely to be affected by any actual or potential discharge;
6. The address and phone number within the department by which interested persons may obtain information, submit comments, and request to be placed on a facility-specific mailing list for future notices;
7. A statement that the department will accept comments and statements of interest regarding the application and will create a facility-specific mailing list for persons who wish to receive future notices.

## 10.0 FACILITY CLOSURE PLAN/POST-CLOSURE PLAN

DCP's Artesia Gas Processing Facility is constructed on privately owned land. Throughout the period of service and upon any such closure of the facility, notice will be provided to the landowner of record as well as to the New Mexico Oil Conservation Division.

Prior to any such closure of the Artesia Gas Processing Facility, notice will be provided to the landowner of record and the New Mexico Oil Conservation Division at least 30 days prior to closure. At that time, final details and requirements of site-closure operations will be confirmed to ensure appropriate actions are taken to adequately reclaim the site at the time of proposed closure. Financial assurance for closure of the facility will be provided to NMOCD.



Key aspects of the Artesia Gas Processing Facility Closure Plan include the following:

1. PREPARATION FOR FACILITY CLOSURE

DCP will isolate any fluids from pipelines and all existing containment structures where liquids are kept for storage. All lines, vessels, and containment structures will be flushed and purged of remnant fluids and material to ensure there is no potential for waste discharge during site closure activities. All purged and recovered fluids will be transported offsite to an approved disposal facility, as previously described. Similarly, any solid waste will be packaged and disposed of off-site at an approved landfill or recycling facility, in accordance with the disposal requirements of such waste. Equipment used to store materials such as hydrocarbons will be properly cleaned and purged to remove any trace hydrocarbons or other substances and prevent any potential for leaching to groundwater. The Facility sump system will be used to clean out all containment structures, and the resulting fluids will be recovered and stored in appropriate temporary containment vessels or immediately transported offsite for proper disposal. All secondary containment structures used in facility operations will be properly cleaned in order to avoid any potential for groundwater contamination.

2. SITE DECOMMISSIONING

Following waste disposal and site preparation activities, decommissioning of facility process equipment and infrastructure will commence. This will generally include, but is not limited to, the physical removal of pipelines (if necessary), facility process equipment, and all associated racks/piping/etc. These activities will be completed in accordance with final site reclamation plans, as determined through coordination with relevant regulatory agencies. Pipelines and other vessels that have been properly cleaned out will either remain in place, be dismantled and disposed of, be recycled, or sold or repurposed at another facility. This may include flares, amine tanks, dehydrators, and all vessels associated with compression, treatment, and processing activities at the Artesia Gas Plant. DCP will determine the final disposition of recycled or waste materials at the time of facility closure and in accordance with the final, agency-approved closure strategy.

3. SITE ENVIRONMENTAL ASSESSMENT AND REMEDIATION ACTIVITIES

Following decommissioning activities, DCP will evaluate any potential impact to the surface or subsurface lands resulting from the operation of the Artesia Facility. As necessary, this may include an environmental assessment of the Plant property, grid-based sampling of surface soils at various points on the property, and potential remediation of identified environmental conditions. See Figure 8 for an example of a preliminary post-closure site sampling strategy. Sampling and analysis activities will fully delineate the extent of any contaminants present using a grid-based sampling method with additional sampling as necessary, and any required remediation activities will be completed in accordance with the regulatory requirements. All contaminants of concern (COC) will be addressed in accordance with this plan and associated regulatory standards, if any are found to be present on the site. Based on the results of laboratory analyses of soil samples, a suitable site delineation and remediation plan will be developed and implemented. Examples of these activities may include, but are not limited to, contaminated soil excavation, groundwater and/or soil treatment activities, and/or the installation of monitoring wells to verify site conditions adequate for closure.

4. FINAL SITE RECLAMATION

Upon confirmation that the facility property has met the standards for environmental condition, site reclamation and re-vegetation activities will be implemented by DCP. This will include site grading to match the native topographic attributes of the area, soil management, and seeding to re-establish vegetation appropriate for the project area. DCP will coordinate and collaborate with



the surface landowner during this time to confirm an appropriate reclamation and re-seeding plan, and to monitor and ensure the success of site-reclamation activities. All reclamation activities will be designed such that they continue to ensure a proper facility closure that does not pose any on-going risk to groundwater or the environment.

Table 6. Estimated Closure Cost Estimates

<b>Task</b>	<b>Estimated Cost</b>
<b>Task 1: Artesia Gas Processing Plant Shut Down</b>	
Purge & Flush	\$200,000.00
Waste Disposal	\$25,000.00
Isolate / Lockout	\$10,000.00
Disassembly and Removal of all site structures and equipment	\$500,000.00
Waste Transport, Disposal, and Recycling	\$25,000.00
<b>Task 2: Soil Investigation &amp; Remediation</b>	
Soil Sampling	\$15,800.00
Remediation and Haul-Off/Disposal (1,000 yds <sup>3</sup> )	\$148,000.00
<b>Task 3: Reclamation</b>	
Restoration & Reseeding (approx. 35 acres)	\$125,000.00
Revegetation Monitoring & Closure (period of 2 years)	\$26,500.00
Reclamation Misc. and Contingency Expenses	\$10,000.00
<b>Total:</b>	<b>\$1,085,300.00</b>

## 11.0 GROUND WATER DISCHARGE PERMIT APPLICATION AND PERMIT FEES

In accordance with 20.6.2.3114 (Table 2) NMAC, DCP Operating Company, LP (the applicant) has made payment of a \$100.00 filing fee to the Water Quality Management Fund.

Upon determination by the New Mexico Oil Conservation Division that a discharge permit can be issued for the DCP Artesia Facility, the associated permit fee of \$4,000.00 will be paid to the Water Quality Management Fund, pursuant to the requirements of 20.6.2.3114 (Table 1) NMAC.

All payments have, or will be paid and sent to the following address:

Water Quality Management Fund  
Oil Conservation Division  
Attn: Environmental Administrative Permitting Supervisor  
1220 South St. Francis Drive  
Santa Fe, NM 87505

## 12.0 ADDITIONAL INFORMATION -- ON-SITE DISPOSAL OF WATER, CARBON DIOXIDE, AND HYDROGEN SULFIDE GAS

Gas processing operations at the DCP Artesia Gas Plant include the utilization of an AGI and SWD well to dispose of TAG consisting of CO<sub>2</sub> and H<sub>2</sub>S gases and facility processed water, respectively. The wells are located within the Plant surface property, as shown in Figure 2.

Artesia SWD #001 (API: 30-015-25271) was drilled to a total depth of 3,975 feet measured depth (MD) within the Lower San Andres and Glorieta Formations. The well was originally drilled by the Phillips Petroleum Company, in 1985, and was most recently transferred to DCP Midstream Operating, LP, in 2017. Prior to this recent transfer of operatorship, the well was operated by related companies DCP Midstream, LP, and Duke Energy Field Services, LP. The well is authorized to inject into the San Andres, Glorieta, and Yeso geologic formations at operating pressures up to a maximum of 810 psig. The well was constructed with two strings of telescoping casing in order to provide physical barriers that separate injection fluid from adjacent geologic strata, and throughout the operational lifetime of the well (since January 2003) the Artesia SWD #001 well has safely injected a total of 4,686 thousand barrels of wastewater. In the event of prolonged downtime of the SWD well, DCP will temporarily coordinate 3<sup>rd</sup>-party trucking and off-site disposal of wastewater commonly disposed of via the on-site SWD well.

Duke AGI #001 (API: 30-015-32324) was drilled to a total depth of 11,520 feet (MD) within the Siluro-Devonian Formation. The AGI well was authorized for injection by the New Mexico Oil Conservation Commission (NMOCC) Order SWD-838-B, issued in May 2002, and has permanently sequestered 7,541 MMSCF of TAG during its operational lifetime. The well was constructed utilizing three telescoping strings of well casing, as well as conductor casing, which provide multiple physical barriers to isolate injected materials from adjacent geologic strata and groundwater resources.

While gases and facility process water injected via the AGI and SWD well do not represent a surface effluent source of potential release to groundwater, the wells have been drilled through the shallow geologic intervals of groundwater, and as such, could transmit waste CO<sub>2</sub> and H<sub>2</sub>S gases and disposal fluid to shallow aquifers in the event of a severe loss of well integrity. The design, construction, integrity testing, and maintenance of the wells are subject to, and in accordance with, requirements of NMOCD and the EMNRD Underground Injection Control (UIC) program, which permits wells to operate following demonstration that groundwater resources are protected.

To prevent unauthorized discharges to the surface and/or subsurface, the injection well operating parameters are continuously monitored and automated alarm and shut-down conditions have been defined and incorporated into automated Plant control systems. Furthermore, the injection system and wells have been designed and constructed such that they include multiple, automated isolation valves at the surface, and in the case of the Duke AGI well, below the surface. As such, any emergency shutdown of the facility or failure of associated process units or pipelines will initiate an automated shutdown of injection activities and activation of isolation valves along the injection pipeline, the injection tree and wellheads, as well as approximately 312 feet below the ground surface. In the unlikely event of failure of injection equipment, extended well downtime, or loss of integrity in any facility injection well, DCP will begin the shut-in procedure for both wells, in order to ensure there is no release or loss of injected fluids, and will provide immediate notification to NMOCD (the regulating agency). DCP will collaborate with NMOCD regarding necessary actions to resolve any identified issues with injection operations.

### 13.0 CERTIFICATION

The proposed Groundwater Discharge Plan included herein describes design, construction, and operational details for the DCP Operating Company, LP (OGRID #36785) Artesia Gas Processing Plant, as they relate to the potential for discharge of contaminants to shallow groundwater resources. With the exception of a septic system and leach field designed to handle sewage waste from facility offices and control room only, there are no intentional discharges of effluent or open retention of solid wastes at this facility. All liquid and solid waste generated from all other facility processes are transported off site for disposal at approved facilities.

I hereby certify that the information submitted with this application is true, accurate, and complete to the best of my knowledge and belief.

David A. White, P.G.  
Vice President – Geolex, Inc.®  
Consultant to DCP Operating Company, LP

Signature:  Date: 08/15/2025

John Cook  
Environmental Director  
DCP Operating Company, LP

Signature:  Date: August 15, 2025



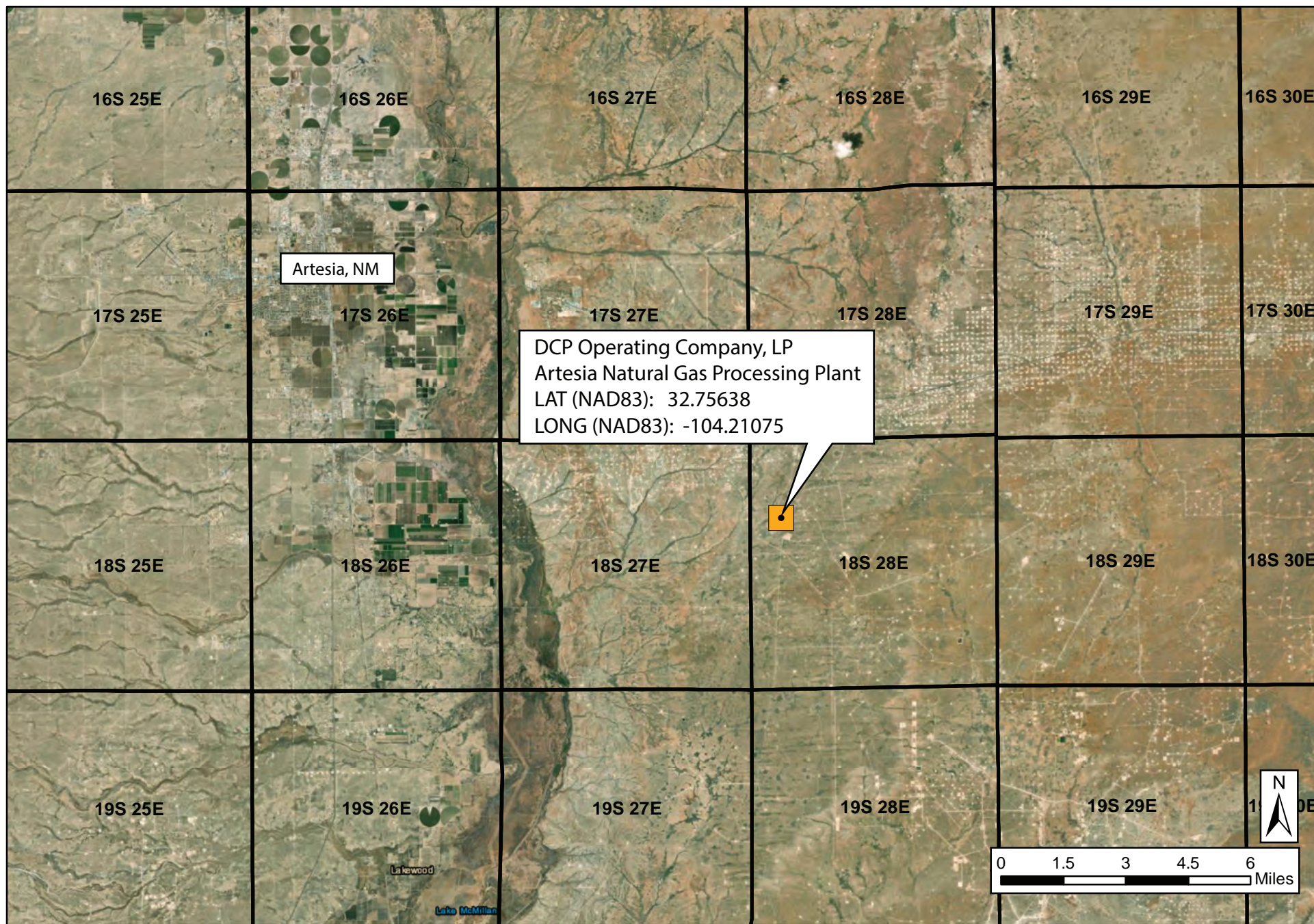


Figure 1. General Location map for the existing DCP Artesia Natural Gas Plant in Section 7 of Township 18 South, Range 28 East, approximately 12 miles southeast of Artesia, New Mexico.



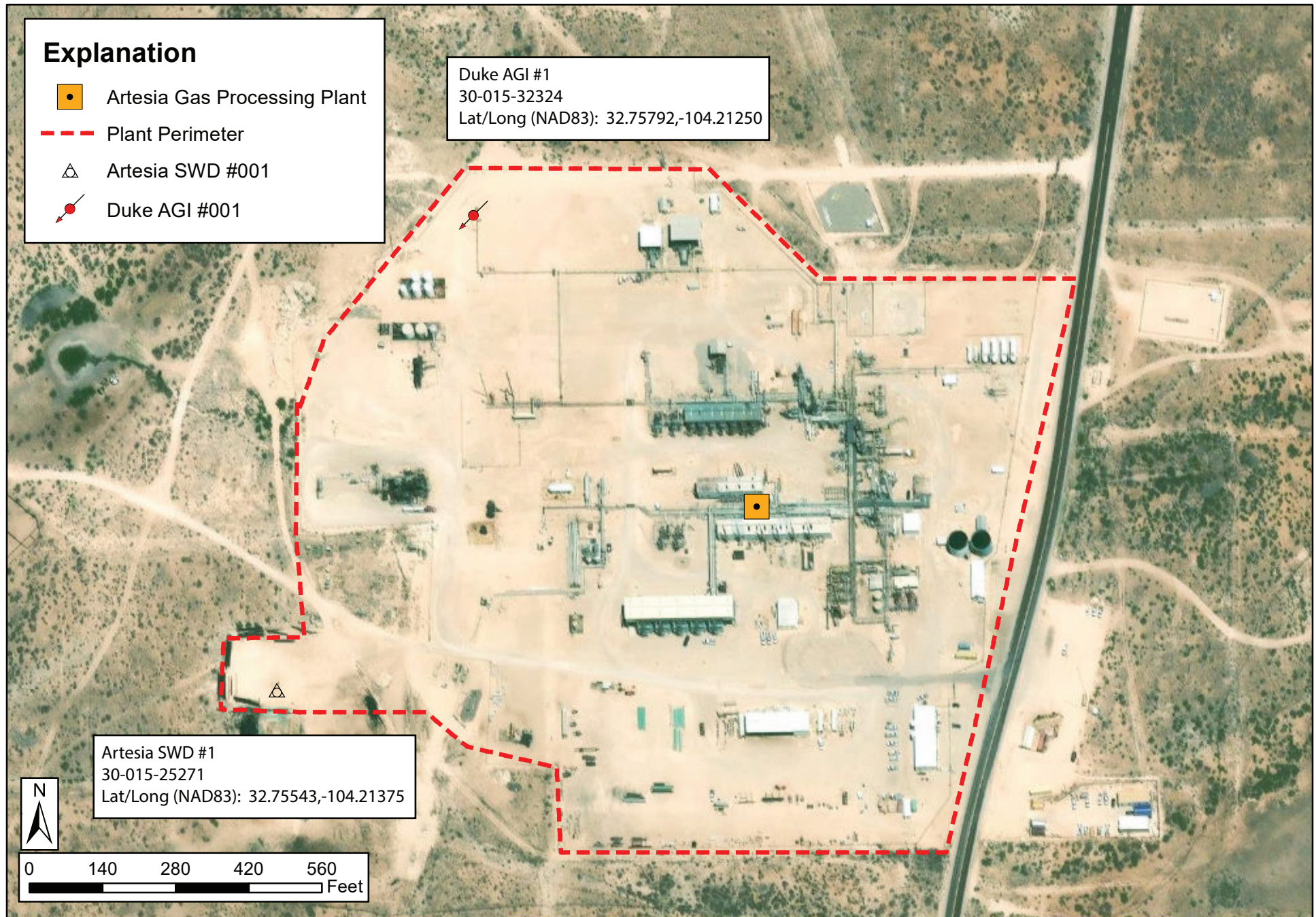


Figure 2. Close-up aerial photographic view of the DCP Artesia Gas Processing Plant and AGI facility, the boundary is illustrated by the dashed red line.



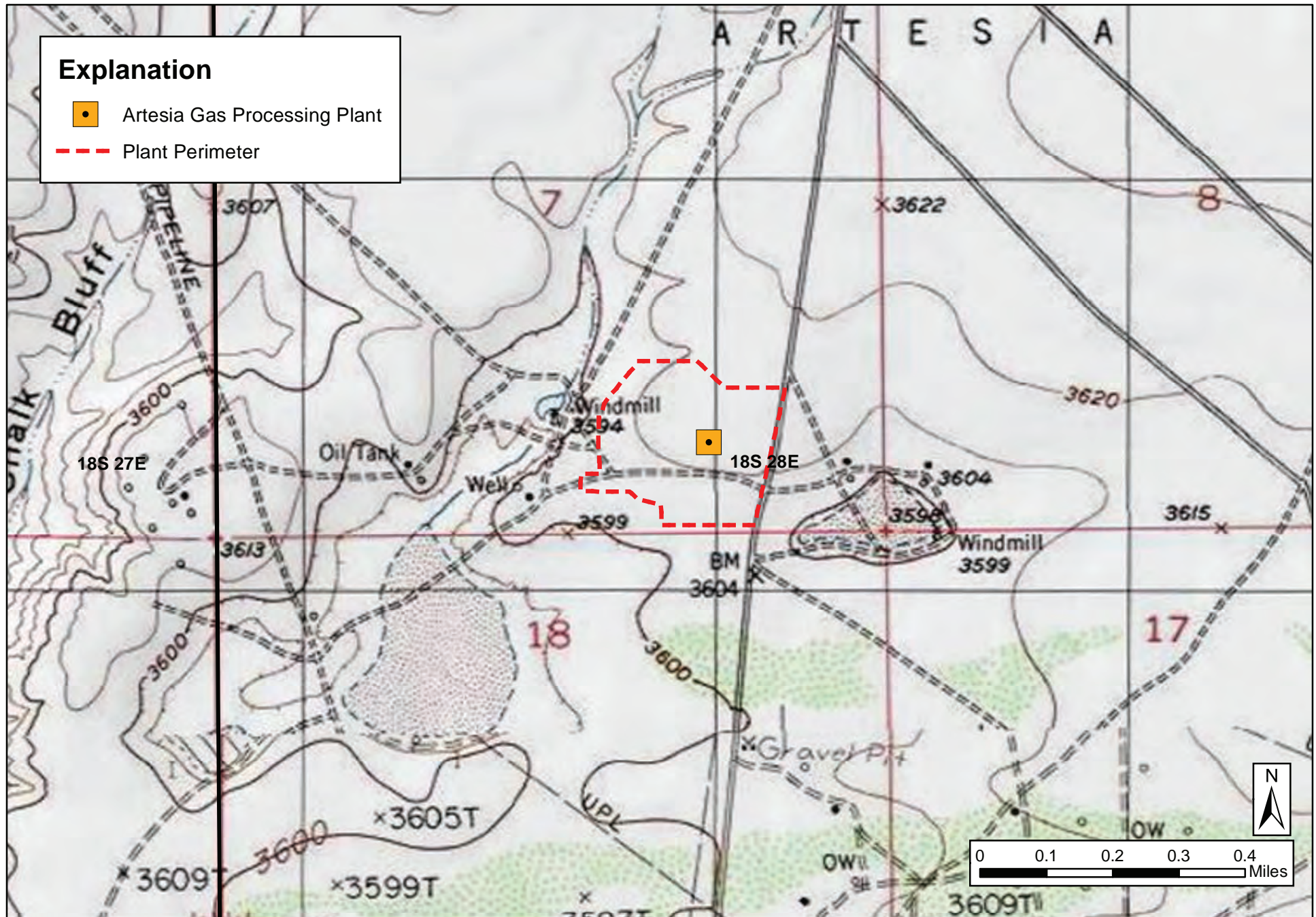


Figure 3. Surface topography map in the vicinity of the DCP Artesia Natural Gas Processing Plant.



## National Flood Hazard Layer FIRMette



## Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
		Area of Undetermined Flood Hazard Zone D
GENERAL STRUCTURES		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		20.2 17.5 Cross Sections with 1% Annual Chance Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped
		The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.



Basemap Imagery Source: USGS National Map 2023



Figure 4. Flood hazard map provided by FEMA showing that the Artesia Plant is not located in a special flood hazard area.





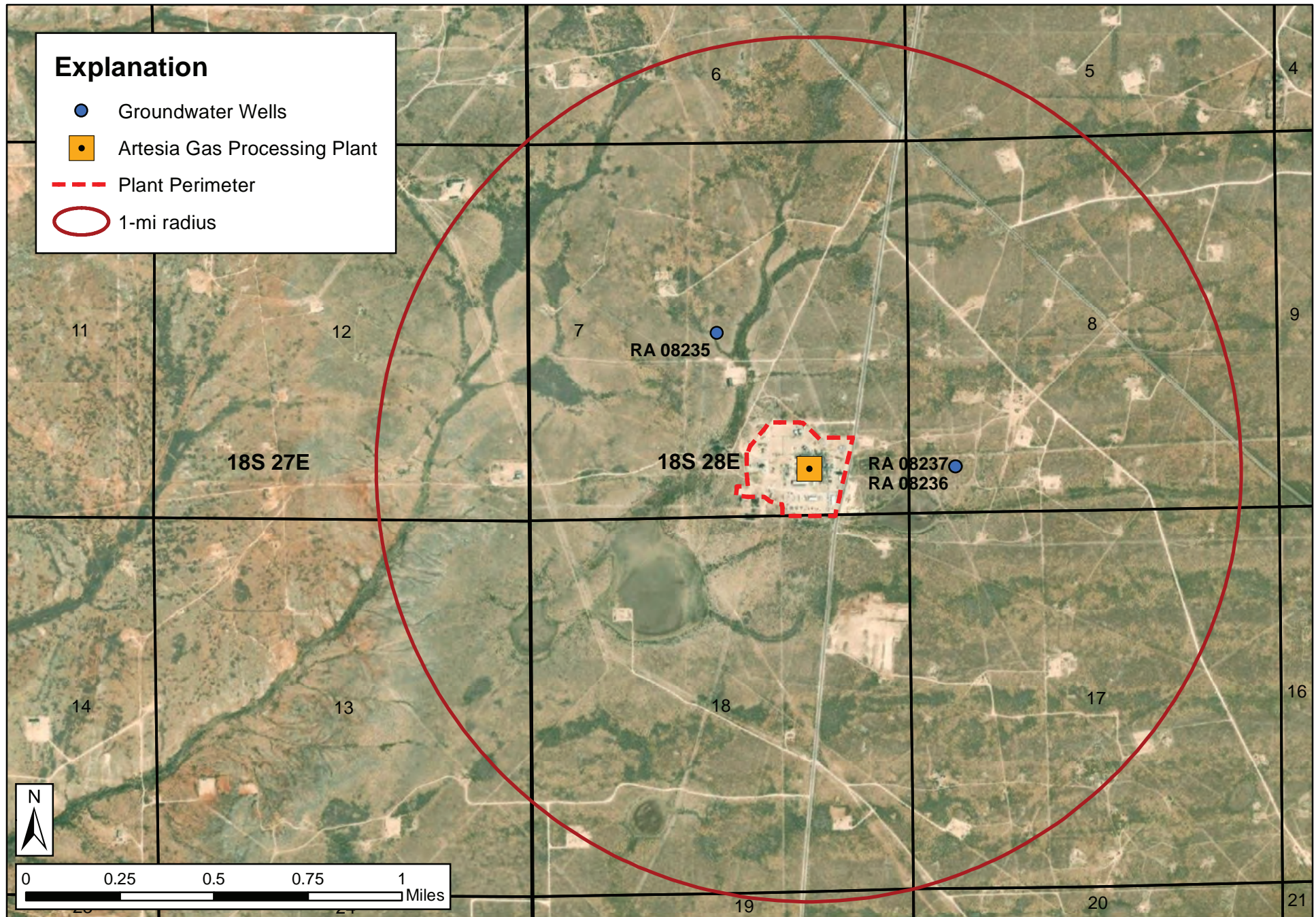
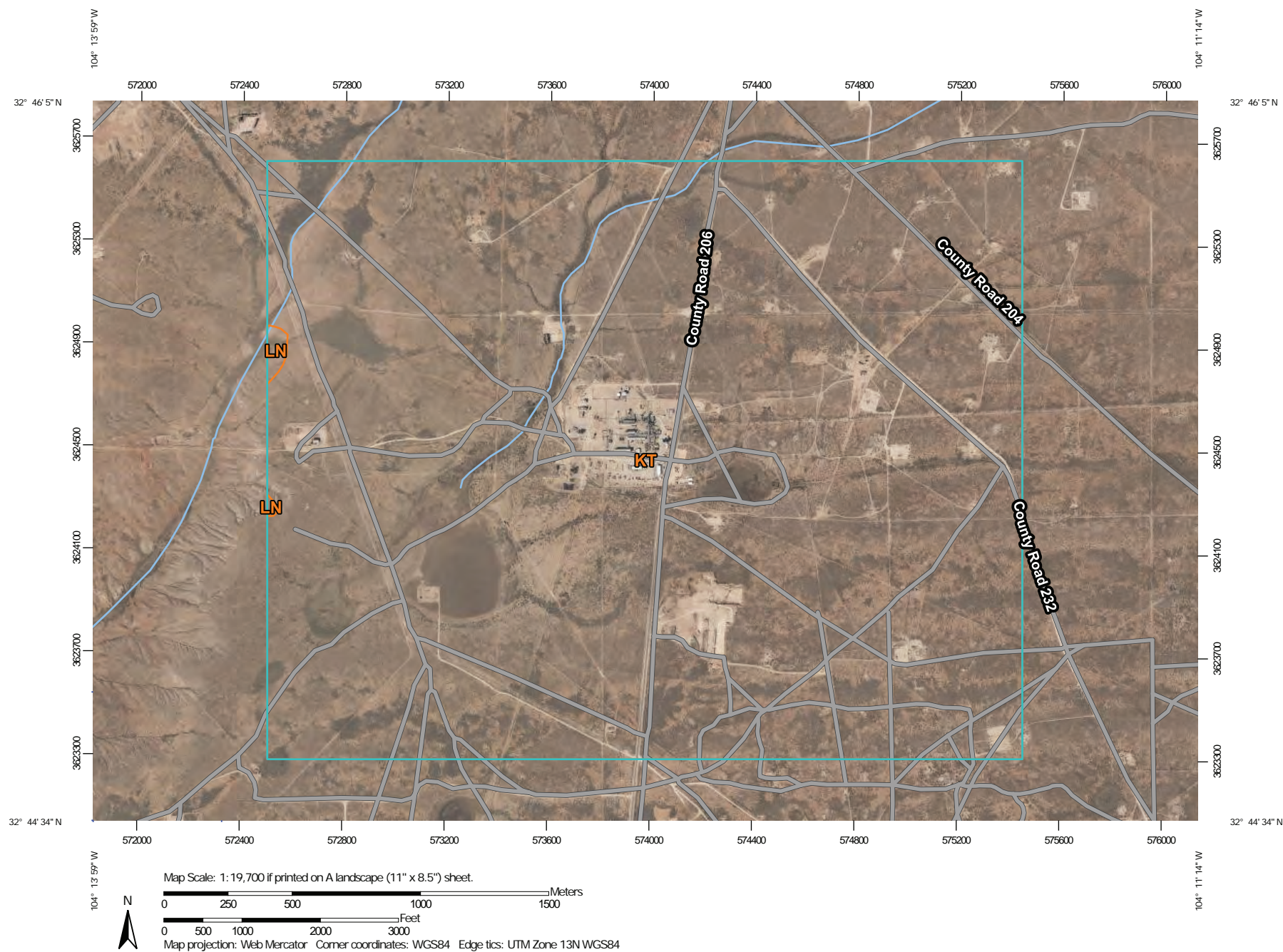


Figure 5. Water wells in the vicinity of DCP Artesia Gas Processing Plant. The status of all three wells are listed as declared and no depths have been reported.





Figure 6. Mapped soil units in the area of the DCP Midstream Artesia Gas Processing Plant (retrieved from the NRCS Web Soil Survey)





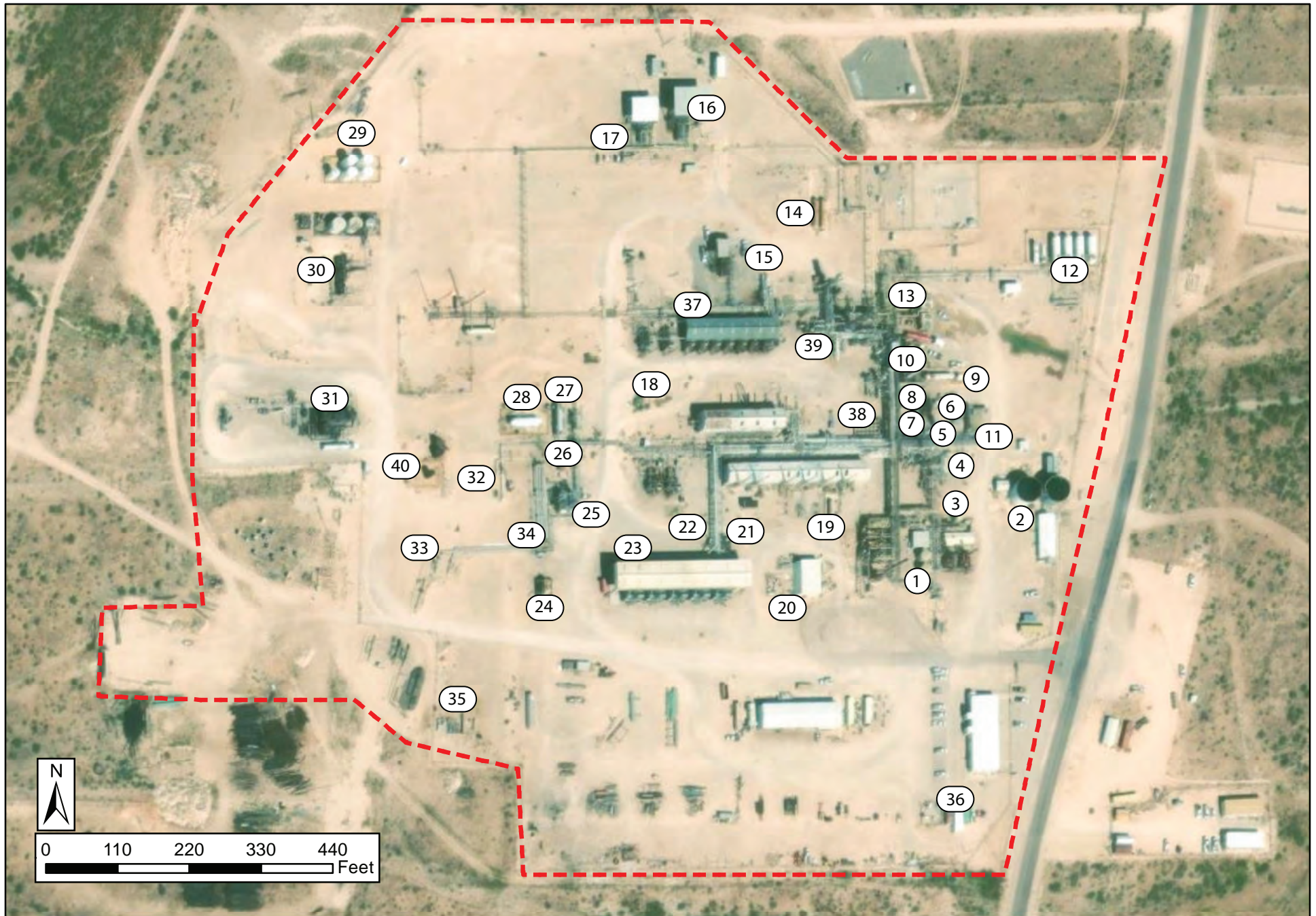


Figure 7. Facility map illustrating location of all vessels and containment structures utilized to temporarily store operation-related materials on the facility property.



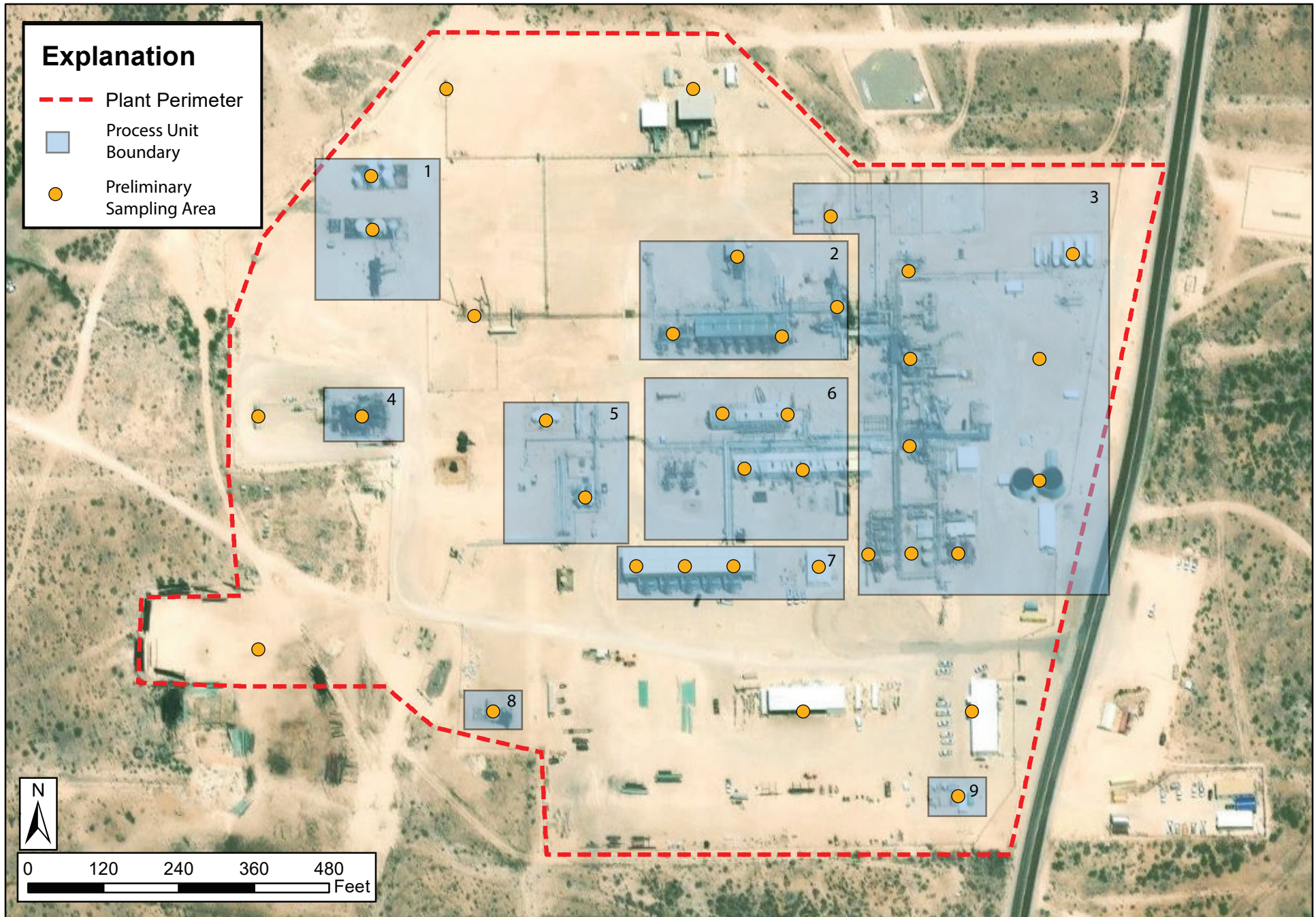


Figure 8. Sampling methodology targets current and former process areas and specific locations of vessels described in this discharge plan.

**APPENDIX A**  
Natural Resources Conservation Service Web Soil Survey  
Map Unit Descriptions



Map Unit Description: Kimbrough-Stegall loams, 0 to 3 percent slopes---Eddy Area, New Mexico

---

## Eddy Area, New Mexico

### KT—Kimbrough-Stegall loams, 0 to 3 percent slopes

#### Map Unit Setting

*National map unit symbol:* 1w4t

*Elevation:* 2,750 to 5,000 feet

*Mean annual precipitation:* 8 to 16 inches

*Mean annual air temperature:* 57 to 70 degrees F

*Frost-free period:* 180 to 230 days

*Farmland classification:* Not prime farmland

#### Map Unit Composition

*Kimbrough and similar soils:* 70 percent

*Stegall and similar soils:* 25 percent

*Minor components:* 5 percent

*Estimates are based on observations, descriptions, and transects of the mapunit.*

#### Description of Kimbrough

##### Setting

*Landform:* Plains, alluvial fans

*Landform position (three-dimensional):* Talf, rise

*Down-slope shape:* Convex, linear

*Across-slope shape:* Linear

*Parent material:* Mixed alluvium and/or eolian sands

##### Typical profile

*H1 - 0 to 3 inches:* loam

*H2 - 3 to 9 inches:* loam

*H3 - 9 to 60 inches:* indurated

##### Properties and qualities

*Slope:* 0 to 3 percent

*Depth to restrictive feature:* 8 to 20 inches to petrocalcic

*Drainage class:* Well drained

*Runoff class:* Very high

*Capacity of the most limiting layer to transmit water (Ksat):* Very low to moderately low (0.00 to 0.06 in/hr)

*Depth to water table:* More than 80 inches

*Frequency of flooding:* None

*Frequency of ponding:* None

*Calcium carbonate, maximum content:* 15 percent

*Maximum salinity:* Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)

*Sodium adsorption ratio, maximum:* 1.0

*Available water supply, 0 to 60 inches:* Very low (about 1.3 inches)

##### Interpretive groups

*Land capability classification (irrigated):* None specified

*Land capability classification (nonirrigated):* 7s

Map Unit Description: Kimbrough-Stegall loams, 0 to 3 percent slopes---Eddy Area, New Mexico

---

*Hydrologic Soil Group:* D  
*Ecological site:* R070BC025NM - Shallow  
*Hydric soil rating:* No

### Description of Stegall

#### Setting

*Landform:* Plains, alluvial fans  
*Landform position (three-dimensional):* Rise  
*Down-slope shape:* Convex, linear  
*Across-slope shape:* Linear  
*Parent material:* Mixed alluvium and/or eolian sands

#### Typical profile

*H1 - 0 to 5 inches:* loam  
*H2 - 5 to 28 inches:* clay loam  
*H3 - 28 to 32 inches:* indurated  
*H4 - 32 to 60 inches:* variable

#### Properties and qualities

*Slope:* 0 to 3 percent  
*Depth to restrictive feature:* 20 to 40 inches to petrocalcic  
*Drainage class:* Well drained  
*Runoff class:* Medium  
*Capacity of the most limiting layer to transmit water (Ksat):* Low to moderately high (0.01 to 0.60 in/hr)  
*Depth to water table:* More than 80 inches  
*Frequency of flooding:* None  
*Frequency of ponding:* None  
*Calcium carbonate, maximum content:* 90 percent  
*Maximum salinity:* Nonsaline to slightly saline (0.0 to 4.0 mmhos/cm)  
*Sodium adsorption ratio, maximum:* 1.0  
*Available water supply, 0 to 60 inches:* Low (about 4.8 inches)

#### Interpretive groups

*Land capability classification (irrigated):* 3e  
*Land capability classification (nonirrigated):* 3e  
*Hydrologic Soil Group:* C  
*Ecological site:* R070BC007NM - Loamy  
*Hydric soil rating:* No

### Minor Components

#### Simona

*Percent of map unit:* 5 percent  
*Ecological site:* R070BD002NM - Shallow Sandy  
*Hydric soil rating:* No

## Data Source Information

Soil Survey Area: Eddy Area, New Mexico  
Survey Area Data: Version 18, Sep 8, 2022

Map Unit Description: Largo-Stony land complex, 0 to 25 percent slopes---Eddy Area, New Mexico

---

## Eddy Area, New Mexico

### LN—Largo-Stony land complex, 0 to 25 percent slopes

#### Map Unit Setting

*National map unit symbol:* 1w50

*Elevation:* 2,000 to 5,700 feet

*Mean annual precipitation:* 6 to 14 inches

*Mean annual air temperature:* 57 to 70 degrees F

*Frost-free period:* 180 to 260 days

*Farmland classification:* Not prime farmland

#### Map Unit Composition

*Largo and similar soils:* 41 percent

*Stony land:* 40 percent

*Minor components:* 19 percent

*Estimates are based on observations, descriptions, and transects of the mapunit.*

#### Description of Largo

##### Setting

*Landform:* Plains, alluvial fans

*Landform position (three-dimensional):* Talf, rise

*Down-slope shape:* Convex, linear

*Across-slope shape:* Linear

*Parent material:* Calcareous alluvium

##### Typical profile

*H1 - 0 to 4 inches:* loam

*H2 - 4 to 47 inches:* silt loam

*H3 - 47 to 65 inches:* loam

##### Properties and qualities

*Slope:* 1 to 5 percent

*Depth to restrictive feature:* More than 80 inches

*Drainage class:* Well drained

*Runoff class:* Low

*Capacity of the most limiting layer to transmit water*

*(Ksat):* Moderately high (0.20 to 0.60 in/hr)

*Depth to water table:* More than 80 inches

*Frequency of flooding:* None

*Frequency of ponding:* None

*Calcium carbonate, maximum content:* 15 percent

*Maximum salinity:* Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)

*Available water supply, 0 to 60 inches:* High (about 10.0 inches)

##### Interpretive groups

*Land capability classification (irrigated):* 3e

*Land capability classification (nonirrigated):* 7e

*Hydrologic Soil Group:* B

Map Unit Description: Largo-Stony land complex, 0 to 25 percent slopes---Eddy Area, New Mexico

---

*Ecological site:* R070BC007NM - Loamy  
*Hydric soil rating:* No

#### **Minor Components**

##### **Simona**

*Percent of map unit:* 7 percent  
*Ecological site:* R070BD002NM - Shallow Sandy  
*Hydric soil rating:* No

##### **Pajarito**

*Percent of map unit:* 6 percent  
*Ecological site:* R070BD003NM - Loamy Sand  
*Hydric soil rating:* No

##### **Largo**

*Percent of map unit:* 6 percent  
*Ecological site:* R070BC017NM - Bottomland  
*Hydric soil rating:* No

## **Data Source Information**

Soil Survey Area: Eddy Area, New Mexico  
Survey Area Data: Version 18, Sep 8, 2022

## **APPENDIX B**

### **Example Notice Letter to Nearby Landowners & Example Newspaper Publication**

Date

Example Notice Letter

Party to be notified

Address

RE: DCP OPERATING COMPANY, LP GROUNDWATER DISCHARGE PLAN

This letter is to advise you that DCP Operating Company, LP (DCP), located at 2331 Citywest Blvd N762, Houston, TX 77042, has filed an approved Groundwater Discharge Plan with the New Mexico Oil Conservation Division for the Artesia Gas Processing Plant, located at Illinois Camp Rd, Artesia, NM 88210, approximately 12 miles southeast of Artesia, NM. Pursuant to the requirements of NMAC 20.6.2.3108(B), landowners within one-third of a mile of the facility must be notified of the approved application. The discharge plan describes any potential for the release of contaminants to groundwater.

Operations at the Artesia Gas Processing Plant include compression, treatment, and processing of natural gas liquids, and permanent disposal of associated waste carbon dioxide and hydrogen sulfide via one acid gas injection well and produced water via one saltwater disposal well. Any associated contaminants are low-volume liquids utilized or produced during Plant operations and are not intentionally released, therefore potential for groundwater release is generally low. The Facility stores over 420,000 gallons of oil, wastewater, condensates, glycol, amine, lube oil, synthetic oil, hot oil surge, and transformer oil in aboveground storage tanks and vessels and is designed to process 230 million standard cubic feet per day of natural gas. These materials are stored in enclosed tanks with secondary containment structures or double-walled sumps with high level alarms.

There are no bodies of surface water or groundwater discharge sites within one mile of the Plant. Nearby groundwater wells indicated that the depth to groundwater ranges from approximately 95 to 300 feet below the surface, with a total dissolved solid (TDS) concentration between 1,730 to 4,740 ppm, in agreement with an average TDS of 2,690 ppm for shallow groundwater resources in the area.

If you have any questions or comments regarding this Plan, would like to be placed on a facility-specific mailing list for future notices, please contact:

Mr. Joel Stone ([joel.stone@emnrd.nm.gov](mailto:joel.stone@emnrd.nm.gov))

New Mexico Oil Conservation Division

Energy Minerals and Natural Resources Division

1220 South St. Francis Drive Santa Fe, NM 87505

(505) 709-5149



DCP Operating Company, LP (2331 Citywest Blvd N762, Houston, TX 77042) has submitted an application to the New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division for issuance of a discharge plan permit for their Artesia Gas Processing Plant located in the Section 7, Township 18 South, Range 28 East in Eddy County, New Mexico. The physical address of the facility is Illinois Camp Rd, Artesia, NM 88210. The facility is located approximately 12 miles southeast of Artesia, New Mexico.

The Facility stores over 420,000 gallons of oil, wastewater, condensates, glycol, amine, lube oil, synthetic oil, hot oil surge, and transformer oil in aboveground storage tanks and vessels and is designed to process 100 million standard cubic feet per day (MMSCDF) of natural gas. The Facility is a cryogenic gas plant through which natural gas and condensate from nearby oil and gas production facilities are transported by pipeline for treatment and processing. Once gathered at the Facility, the produced natural gas is treated to remove waste gases (carbon dioxide and hydrogen sulfide) and cryogenically processed to isolate natural gas and condensate products, which are subsequently transported to customers, via pipeline and commercial trucking services. DCP operates one acid gas injection well and one saltwater disposal well at the Artesia Facility to permanently dispose of waste gases or produced water associated with these activities. The discharge permit includes a description of materials stored and used at the Facility and any waste generated. Groundwater occurs between approximately 95 – 300 feet below ground surface and contains total dissolved concentrations (TDS) typically between 1,730 and 4,740 milligrams per liter (mg/L). The discharge permit addresses how liquids and solid waste will be handled, stored, and disposed of, including procedures to prevent unintended discharge. Response actions and abatement requirements for spills and leaks are addressed.

The NMOCD has determined the application is administratively complete and is in the process of preparing a draft permit. The NMOCD shall post notice on its website and distribute notice of the submittal of the application to affected local, state, federal, tribal, or pueblo government agency, political subdivisions, ditch associations, and land grants as identified by the department, and persons on a general and facility-specific list maintained by the department who have requested notice of discharge permit applications. Interested persons may obtain information, submit comments, and request to be placed on a facility-specific mailing list for future notices. The NMOCD will also accept comments and statements of interest regarding the draft permit and will create a facility-specific mailing list for persons who wish to receive future notices. Prior to ruling on any proposed permit, the Director shall allow a period of at least (30) days after the draft permit is posted, during which time interested persons may submit comments.

Persons interested in obtaining further information, submitting comments, or requesting to be on a facility-specific mailing list for future notices may contact the Oil Conservation Division contact listed below:

Mr. Joel Stone  
New Mexico Oil Conservation Division  
Energy Minerals and Natural Resources Division  
1220 South St. Francis Drive Santa Fe, NM 87505  
(505) 709-5149

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 526065

CONDITIONS

Operator: DCP OPERATING COMPANY, LP 2331 Citywest Blvd Houston, TX 77042	OGRID: 36785
	Action Number: 526065
	Action Type: [UF-DP] Generic Discharge Plan (DISCHARGE PLAN SERVICE COMPANIES)

CONDITIONS

Created By	Condition	Condition Date
joel.stone	OCD emailed the discharge permit application approval letter to the operator on November 26, 2025. The emailed approval is attached to this application.	11/26/2025