

Chaco Plant Event 10/28/2024

[illegible]

VOC exceedance count (3) = $(30.0 - 10.9) + (18.6 - 10.9) + (19.7 - 10.9) = 35.6 \text{ lb/hr VOC}$ (22.76 lb/hr Average Emission Rate)

C1 Blowdown Volume: (18.055 MCF) (217 lbs VOCs) Fits in Annual limits

C2 Blowdown Volume: (21.038 MCF) (252 lbs VOCs) Fits in Annual limits

Refrigerant Economizer V-8115 (78"x20' @ ~38% liquid level change) = **2,647 lb of C3 All VOC M1 – Malfunction VOC**

Refrigerant Surge V-8116 (5.5"x14' @ ~30% liquid level change) = **7,486 lb of C3 All VOC M1 – Malfunction VOC**

10133 lbs VOC Propane was assumed to be released to atmosphere due to broken valve cover and is included in the blowdown SSM.

SECTION I - GENERAL INFORMATION

AI Number: *	1148	Change AI	Emission Unit No.:	SSM Flare 44	Select Emission Unit
Activity Number:	001148-10282024-01		Emission Unit Desc.:	Start-up Shut-down Maintenance	
Facility Name:	<input type="text" value="Chaco Gas Plant"/>		Release Point No.:	SSM Flare 44	Select Release Point
Company Name:	<input type="text" value="Enterprise Field Services, LLC"/>		Release Point Desc.:	Start-up Shut-down Maintenance	
Source Is:	<input checked="" type="radio"/> Stationary Source <input type="radio"/> Portable Source		Military Time (HH:MM)		
Portable Location:	UTM: <input type="text"/>		Discovery Date/Time:	<input type="text" value="10/26/2024"/>	Time: <input type="text" value="20"/> : <input type="text" value="55"/>
	Lat: <input type="text"/> Long: <input type="text"/>		Start Date/Time:	<input type="text" value="10/26/2024"/>	Time: <input type="text" value="20"/> : <input type="text" value="00"/>
Title V Permit No.:	<input type="text" value="P116R3"/>		End Date/Time:	<input type="text" value="10/27/2024"/>	Time: <input type="text" value="2"/> : <input type="text" value="00"/>
NSR Permit No.:	<input type="text" value="PSD-1555M7R5"/>		1st Business Day after Discovery:	<input type="text" value="10/28/2024"/>	
			Submission Status:	<input type="text" value="Initial EER"/>	

First Name / Last Name:	<input type="text" value="Philip"/>	<input type="text" value="Cowan"/>	Office Phone:	<input type="text" value="505-320-9626"/>	Extn.:	<input type="text"/>
E-mail Address:	<input type="text" value="plcowan@eprod.com"/>		Cell Phone:	<input type="text"/>		

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SECT. II - REPORT REQ.

- ☒ 20.2.7 NMAC
☒ 20.2.70 NMAC (Title V)
☐ 40 CFR 60 (NSPS)
☐ 40 CFR 63 (MACT)
(Check all that apply)

SECTION III - EVENT TYPE

- | | | |
|---|---|--|
| <input type="radio"/> Malfunction
<input type="radio"/> Startup
<input type="radio"/> Shutdown
<input checked="" type="radio"/> Emergency
<input type="radio"/> Scheduled Maintenance
<input type="radio"/> Other
<input checked="" type="checkbox"/> Title V Deviation | Start-up, Shutdown, or Scheduled Maintenance Notification:
<input type="radio"/> Yes
<input type="radio"/> No
<input checked="" type="radio"/> N/A | Notification Submitted: <input type="text"/>
Explain Why Notif. Not Submitted or N/A:
<input type="text"/> |
| Affirmative Defense Claim:
<input checked="" type="radio"/> Yes
<input type="radio"/> No | Is Excess Emission part of settlement agreement?:
<input type="radio"/> Yes
<input checked="" type="radio"/> No | Settlement Agreement Number:
<input type="text"/> |

SECTION IV - CAUSE AND NATURE OF EVENT

Detailed label:

Liquid propane carryover into the first stage of the refrigeration compressor C8103 resulted in a shearing off of a valve cover. Propane was released into compressor building and ignited. Plant operations initiated a complete facility ESD and evacuated to the muster area.

SECTION V - STEPS TAKEN TO LIMIT DURATION OF EXCESS EMISSION

Detailed label:

Facility ESD was initiated with blow down

SECTION VI - CORRECTIVE MEASURES TAKEN

Detailed label:

Facility ESD was initiated with blow down

SECTION VII - EMISSIONS ARE IN EXCESS OF THE FOLLOWING REQUIREMENT

Permit Number

P116-R3

Condition

Table 107.A

OR



Regulatory Citation

Section

Text of stated emissions limits which were exceeded:

Allowable SSM and Malfunction Units, Activities, and Emission Limits.

SECTION VIII - EXCESS EMISSION DETAIL LINES

Pollutant	Duration of Event (hh:mm)	Emission Limits or Standards	Averaging Period	Excess Emissions for Event	Number of Exceedences	Average Emission Rate for Averaging Period	Actions
Volatile Organic Compounds (VOC)	03:00	10.9 lbs./hour	1.0 hour	35.6 lbs.	3	22.76 lbs./hour	 

Add Emission Detail Line

SECTION IX - BASIS OF ESTIMATE

- ☐ Compliance Testing
☐ Continuous Emission Monitor
☒ Calculation
☐ Operating Log(s)
☐ Other (specify):

SECTION X - SUBMISSION

By clicking on the Certify button, I agree to the following:

After reasonable inquiry, I certify this report as true, accurate and complete.

Reporting Official:

Philip

Cowan

Title:

Environmental Scientist

SECTION I - GENERAL INFORMATION

AI Number: *	1148	Change AI	Emission Unit No.:	M1	Select Emission Unit
Activity Number:	001148-10282024-02		Emission Unit Desc.:	Malfunction VOC	
Facility Name:	Chaco Gas Plant		Release Point No.:	M1	Select Release Point
Company Name:	Enterprise Field Services, LLC		Release Point Desc.:	Malfunction VOC	
Source Is:	<input checked="" type="radio"/> Stationary Source <input type="radio"/> Portable Source		Military Time (HH:MM)		
Portable Location:	UTM: <input type="text"/>		Discovery Date/Time:	10/26/2024	Time: 20:55
	Lat: <input type="text"/> Long: <input type="text"/>		Start Date/Time:	10/26/2024	Time: 20:00
Title V Permit No.:	P116R3		End Date/Time:	10/26/2024	Time: 21:00
NSR Permit No.:	PSD-1555M7R5		1st Business Day after Discovery:	<input type="text"/>	
			Submission Status:	Initial EER	

First Name / Last Name:	Philip	Cowan	Office Phone:	505-320-9626	Extn.:	<input type="text"/>
E-mail Address:	plcowan@eprod.com		Cell Phone:	<input type="text"/>		

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SECT. II - REPORT REQ.

- ☒ 20.2.7 NMAC
☒ 20.2.70 NMAC (Title V)
☐ 40 CFR 60 (NSPS)
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<input type="radio"/> Yes
<input type="radio"/> No
<input checked="" type="radio"/> N/A | Notification Submitted: <input type="text"/>
Explain Why Notif. Not Submitted or N/A:
<input type="text"/> |
| Affirmative Defense Claim:
<input checked="" type="radio"/> Yes
<input type="radio"/> No | Is Excess Emission part of settlement agreement?:
<input type="radio"/> Yes
<input checked="" type="radio"/> No | Settlement Agreement Number:
<input type="text"/> |

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Detailed label:

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Volatile Organic Compounds (VOC)	01:00	0.0 lbs./hour	1.0 hour	10133.0 lbs.	1	10133.0 lbs./hour	 

Add Emission Detail Line

SECTION IX - BASIS OF ESTIMATE

- ☐ Compliance Testing
☐ Continuous Emission Monitor
☒ Calculation
☐ Operating Log(s)
☐ Other (specify):

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Philip

Cowan

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Facility Name:	<input type="text" value="Chaco Gas Plant"/>		Release Point No.:	SSM Flare 44	Select Release Point
Company Name:	<input type="text" value="Enterprise Field Services, LLC"/>		Release Point Desc.:	Start-up Shut-down Maintenance	
Source Is:	<input type="radio"/> Stationary Source <input checked="" type="radio"/> Portable Source		Discovery Date/Time:	<input type="text" value="10/02/2024"/>	<input type="text" value="17"/> Time: <input type="text" value="8"/> : <input type="text" value="00"/>
Portable Location:	UTM: <input type="text"/>		Start Date/Time:	<input type="text" value="10/01/2024"/>	<input type="text" value="17"/> Time: <input type="text" value="9"/> : <input type="text" value="00"/>
	Lat: <input type="text"/> Long: <input type="text"/>		End Date/Time:	<input type="text" value="10/01/2024"/>	<input type="text" value="17"/> Time: <input type="text" value="16"/> : <input type="text" value="00"/>
Title V Permit No.:	<input type="text" value="P116R3"/>		1st Business Day after Discovery:	<input type="text"/>	
NSR Permit No.:	<input type="text" value="PSD-1555M7R5"/>		Submission Status:	<input type="text" value="Initial/Final EER"/>	

First Name / Last Name:	<input type="text" value="Philip"/>	<input type="text" value="Cowan"/>	Office Phone:	<input type="text" value="505-320-9626"/>	Extn.:	<input type="text"/>
E-mail Address:	<input type="text" value="plcowan@eprod.com"/>		Cell Phone:	<input type="text"/>		

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- ☒ 20.2.7 NMAC
☒ 20.2.70 NMAC (Title V)
☐ 40 CFR 60 (NSPS)
☐ 40 CFR 63 (MACT)
(Check all that apply)

SECTION III - EVENT TYPE

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|--|--|--|
| <input type="radio"/> Malfunction
<input type="radio"/> Startup
<input type="radio"/> Shutdown
<input type="radio"/> Emergency
<input checked="" type="radio"/> Scheduled Maintenance
<input type="radio"/> Other | <input type="radio"/> Yes
<input checked="" type="radio"/> No
<input type="radio"/> N/A | Start-up, Shutdown, or Scheduled Maintenance Notification:
Notification Submitted: <input type="text"/>
Explain Why Notif. Not Submitted or N/A:
<input type="text" value="Routine Maintenance"/> |
| <input checked="" type="checkbox"/> Title V Deviation | Affirmative Defense Claim:
<input type="radio"/> Yes
<input checked="" type="radio"/> No | Is Excess Emission part of settlement agreement?:
<input type="radio"/> Yes
<input checked="" type="radio"/> No
Settlement Agreement Number: <input type="text"/> |

SECTION IV - CAUSE AND NATURE OF EVENT

Detailed label:

The plant was shut down for maintenance. During the shutdown operation, engines and turbines blew down to the Cryo Flare unit 44.

SECTION V - STEPS TAKEN TO LIMIT DURATION OF EXCESS EMISSION

Detailed label:

The duration of blowdowns is limited.

SECTION VI - CORRECTIVE MEASURES TAKEN

Detailed label:

Engines and turbines shut down thus ceasing venting.

SECTION VII - EMISSIONS ARE IN EXCESS OF THE FOLLOWING REQUIREMENT

Permit Number

P116-R3

Condition

Table 107.A

OR







Regulatory Citation

Section

Text of stated emissions limits which were exceeded:

Allowable SSM and Malfunction Units, Activities, and Emission Limits.

SECTION VIII - EXCESS EMISSION DETAIL LINES

Pollutant	Duration of Event (hh:mm)	Emission Limits or Standards	Averaging Period	Excess Emissions for Event	Number of Exceedences	Average Emission Rate for Averaging Period	Actions
Carbon Monoxide	07:00	109.6 lbs./hour	1.0 hour	141.6 lbs.	2	79.32 lbs./hour	 
Nitrogen Dioxide	07:00	54.9 lbs./hour	1.0 hour	70.9 lbs.	2	39.75 lbs./hour	 
Volatile Organic Compounds (VOC)	07:00	10.9 lbs./hour	1.0 hour	158.5 lbs.	4	30.48 lbs./hour	 

Add Emission Detail Line


SECTION IX - BASIS OF ESTIMATE

- ☐ Compliance Testing
☐ Continuous Emission Monitor
☒ Calculation

SECTION X - CERTIFICATION

By clicking on the Certify button, I agree to the following:

After reasonable inquiry, I certify this report as true, accurate and complete.



New Mexico

ENVIRONMENT

Department

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AQB Compliance Reporting

Philip L CowanUser Guide

HomeRegister for Additional FacilitiesManage E-SignLogout

Report Attached DocumentsReturn to List

The report was successfully certified

AI Number:1148

Workflow Step:Closed

Activity Number:001148-10022024-01

Discovered:10/02/2024

Facility Name:Chaco Gas Plant





Event Start:10/01/2024

Company Name:Enterprise Field Services, LLC

Event End:10/01/2024

Form to Submit	Due Date	Actual Date	Original Due Date	Extension Request	Actions
Initial EER	10/03/2024	10/02/2024			
Final EER	10/16/2024	10/02/2024			
Affirmative Defense					

FACILITY ATTACHED DOCUMENTS

Uploaded	Document Title	File Name	Size	Actions
10/02/2024	EER 001148-10022024-01 Initial-Final EER	EER_001148-10022024-01_Initial-Final_EER.zip	106 KB	   

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

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

QUESTIONS

Action 396288

QUESTIONS

Operator: Enterprise Field Services, LLC PO Box 4324 Houston, TX 77210	OGRID: 241602
	Action Number: 396288
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2430131506
Incident Name	NAPP2430131506 CHACO PLANT - C8103 COMPRESSOR EXPLOSION @ 0
Incident Type	Fire
Incident Status	Initial C-141 Received

Location of Release Source	
<i>Please answer all the questions in this group.</i>	
Site Name	Chaco Plant - C8103 Compressor Explosion
Date Release Discovered	10/26/2024
Surface Owner	Private

Incident Details	
<i>Please answer all the questions in this group.</i>	
Incident Type	Fire
Did this release result in a fire or is the result of a fire	Yes
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	Yes
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

Nature and Volume of Release	
<i>Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.</i>	
Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Not answered.
Is the concentration of chloride in the produced water >10,000 mg/l	No
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Cause: Fire Gas Plant Natural Gas Vented Released: 39 Mcf Recovered: 0 Mcf Lost: 39 Mcf.
Natural Gas Flared (Mcf) Details	Cause: Fire Gas Plant Natural Gas Flared Released: 445 Mcf Recovered: 0 Mcf Lost: 445 Mcf.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	At approximately 21:58 central time, a fire and explosion occurred at the Chaco Gas plant (PSM facility) in Bloomfield, New Mexico. The fire/explosion occurred at the refrigerant C-8103 compressor unit at the plant. No injuries nor fatalities. Local emergency services responded as a precaution. Minimal liquids were released.

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QUESTIONS, Page 2

Action 396288

QUESTIONS (continued)

Operator: Enterprise Field Services, LLC PO Box 4324 Houston, TX 77210	OGRID: 241602
	Action Number: 396288
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	Yes, according to supplied volumes this appears to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (2) an unauthorized release of a volume that: (a) results in a fire or is the result of a fire; (d) substantially damages property or the environment.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.	

Initial Response

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

The source of the release has been stopped	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	Not answered.

Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.

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

I hereby agree and sign off to the above statement	Name: Thomas Long Title: Sr Field Environmental Scientist Email: tjlong@eprod.com Date: 11/04/2024
--	---

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QUESTIONS, Page 3

Action 396288

QUESTIONS (continued)

Operator: Enterprise Field Services, LLC PO Box 4324 Houston, TX 77210	OGRID: 241602
	Action Number: 396288
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Site Characterization	
<i>Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Less than or equal 25 (ft.)
What method was used to determine the depth to ground water	Direct Measurement
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Between 1000 (ft.) and ½ (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Greater than 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Between 1 and 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Greater than 5 (mi.)
Any other fresh water well or spring	Greater than 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1000 (ft.) and ½ (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Between 1 and 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
Requesting a remediation plan approval with this submission	No
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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CONDITIONS

Action 396288

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Operator: Enterprise Field Services, LLC PO Box 4324 Houston, TX 77210	OGRID: 241602
	Action Number: 396288
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

CONDITIONS

Created By	Condition	Condition Date
scott.rodgers	None	11/4/2024