

H2S – 58, 59 & 60

**AGAVE PENASCO,
LaRUE & LISA CS
H2S CPs**

2013

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Tuesday, June 11, 2013 2:54 PM
To: 'Jennifer Knowlton'
Cc: Austin Weyant; Dawson, Scott, EMNRD; Sanchez, Daniel J., EMNRD; VonGonten, Glenn, EMNRD; Gerholt, Gabrielle, EMNRD
Subject: RE: Agave Energy Company H2S Contingency Plans Lisa (H2S-060), Larue (H2S-059) and Penasco (H2S-058) Compressor Stations

Dear Ms. Knowlton:

The New Mexico Oil Conservation Division (OCD) has completed its review of the above subject H2S Contingency Plans (February 1, 2013) and find that they appear to meet the intent of the OCD "Hydrogen Sulfide" Regulations (19.14.11 NMAC).

However, the OCD requests a hardcopy with electronic (Acrobat Reader™) submittals of the final version for each facility **without** the text, "Not Approved by OCD" by COB on July 3, 2013.

Please note that OCD reserves the right to modify and change an H2S Contingency Plan in cooperation with Agave Energy Company.

Please contact me if you have questions. Thank you for your cooperation.

Please be advised that OCD approval of this plan does not relieve Agave Energy Company of responsibility should its operations fail to adequately investigate and remediate contamination that poses a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve Agave Energy Company of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Carl J. Chavez, CHMM
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"Why Not Prevent Pollution; Minimize Waste; Reduce the Cost of Operations; & Move Forward With the Rest of the Nation?" To see how, please go to: "Pollution Prevention & Waste Minimization" at <http://www.emnrd.state.nm.us/ocd/environmental.htm#environmental>

From: Jennifer Knowlton [mailto:jenniferk@yatespetroleum.com]
Sent: Thursday, February 07, 2013 9:48 AM
To: Chavez, Carl J, EMNRD
Cc: Austin Weyant; Jennifer Knowlton
Subject: Agave Energy Company H2S Contingency Plans

Mr. Chavez,

Attached please find revised H2S Contingency Plans for the Lisa Compressor Station, the Larue Compressor Station, and the Penasco Compressor Station. I have also taken the liberty of prefilling the associated checklists with sections and page numbers to make your review more efficient. I also included some notes. Some of our responses to the requirements are dependent on company policies. For instance, Agave personnel are only trained in insipient firefighting. We do not have in-house trained personnel.

I have also mailed a hard copy of each of these documents to your attention. I understand that sometimes the map formatting can be difficult to print and have tried to preformat this document to print on a standard size. If you have any questions, please feel free to email me.

Jennifer Knowlton, PE

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From: Chavez, Carl J, EMNRD [<mailto:CarlJ.Chavez@state.nm.us>]
Sent: Friday, December 07, 2012 3:49 PM
To: Jennifer Knowlton
Cc: Dade, Randy, EMNRD
Subject: Agave Energy Company Penasco Compressor Station Hydrogen Sulfide Gas Contingency Plan (CP) (H2S-058) Review Comments

Dear Ms. Knowlton:

Good afternoon. The New Mexico Oil Conservation Division (OCD) has completed its preliminary review (review) of the above subject Hydrogen Sulfide Gas Contingency Plan (CP).

The OCD appreciates your cooperation in advance on your submittal and efforts to submit an approvable CP. It is helpful when facilities appear to be isolated.

Based on the OCD's review, please find attached the OCD's checklist with review comments that may help the operator to complete an approvable CP.

In addition, the OCD requests that the operator use this checklist and the comments/recommendations, etc. to revise the LaRue Compressor Station (H2S-059) CP and Lisa Compressor Station (H2S-060) CP. These CPs were submitted together and appear to contain very similar information and/or formatting, etc. I have also attached the OCD H2S Regulations to assist you with the completion of the CPs.

Please submit the revised CPs to the OCD within 60 days of today's date or on or before February 7, 2013.

Please contact me if you have questions. Thank you.

Carl J. Chavez, CHMM
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