H2S – 042

H2S Contingency Plan

2015

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

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Cabinet Secretary

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Oil Conservation Division

FEBRUARY 6, 2015

Julie W. Gutiérrez
Geolex, Inc®
500 Marquette Avenue, NW Suite 1350
Albuquerque, NM 87102

RE: DCP Midstream, L.P. (H2S-042): "Eunice Gas Plant H2S Contingency Plan" dated February 2015 in Lea County, New Mexico

Dear Mrs. Gutiérrez:

The Oil Conservation Division (OCD) is in receipt of the DCP Midstream L.P. revised "**Eunice Gas Plant H2S Contingency Plan**" (plan) dated February 2015.

OCD has completed its review of the plan and finds that it appears to meet the intent of the OCD "Hydrogen Sulfide Gas" Regulations (19.15.11 NMAC). Therefore, OCD hereby **accepts** the plan for record.

Please be advised that OCD approval of this plan does not relieve DCP Midstream, L.P. of responsibility should their operations fail to adequately detect, investigate, and/or undertake corrective actions to prevent or stop a hydrogen sulfide release(s) that may pose a threat to groundwater, surface water, human health, public safety or the environment. In addition, OCD acceptance of the plan does not relieve DCP Midstream, L.P. of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions, please contact Carl Chavez of my staff at (505) 476-3490, mail at the address below, or email at CarlJ.Chavez@state.nm.us. Thank you.

Sincerely,

Jim Griswold
Environmental Bureau Chief

JG/cjc

cc: OCD Hobbs District Office

H_2S Contingency Plan

Eunice Gas Plant

DCP Midstream, LP

February 2015

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GLOSSARY OF ACRONYMS UTILIZED IN THE PLAN

ACGIH	American Conference of Governmental Industrial Hygienists
AGI	Acid Gas Injection
ANSI	American National Standards Institute
API	American Petroleum Institute
CO_2	Carbon Dioxide
DCS	Distributed Control System
ERO	Emergency Response Officer
ESD	Emergency Shut-Down
H_2S	Hydrogen Sulfide
IC	Incident Commander
ICS	Incident Command System
ICC	Incident Command Center
IDLH	Immediately Dangerous to Life or Health
LEL	Lower Explosive Limit
LEPC	Local Emergency Planning Committee
MSDS	Materials Safety Data Sheets
NACE	National Association of Corrosive Engineers
NCP	National Contingency Plan
NIIMS	National Interagency Incident Management System
NIOSH	National Institute for Occupational Safety and Health
NGL	Natural Gas Liquid
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
NMOCC	New Mexico Oil Conservation Commission
OCD	Oil Conservation Division
OSHA	Occupational Safety and Health Administration
PLC	Programmable Logic Controller
PPE	Personal Protective Equipment
PPM	Parts Per Million
PSD	Process Shut-Down
ROE	Radius of Exposure
SCBA	Self-Contained Breathing Apparatus
SERC	State Emergency Response Commission
SO_2	Sulfur Dioxide
STEL	Short Term Exposure Limit
TLV	Threshold Limit Value
TWA	Time Weighted Average

Location of Facility

EUNICE GAS PLANT

DCP Midstream, LP (DCP) owns and operates a gas processing plant near Eunice New Mexico which is located in Section 6, Township 19S, Range 37E and encompasses 164.6 acres. The Plant is located approximately seven miles west of Eunice off of State Highway 175.

Physical address: 136 State Hwy 175, Oil Center, NM 88240

Mailing address: P.O. Box 47, Monument, NM 88265

Driving Directions from Eunice, NM to the Plant: Proceed west on State Highway 176 to State Highway 8 and continue two and one-half miles (past Oil Center) to the Eunice Plant sign, turn left and travel approximately one mile to the plant.

I. INTRODUCTION [API RP-55 7.1]

The Eunice Gas Plant (hereinafter the "Plant") is a natural gas processing plant which processes field gas containing hydrogen sulfide (H_2S) and handles and/or generates sulfur dioxide (SO_2). The Plant has an associated Sulfur Reduction Unit (SRU) which it utilizes to convert H_2S to elemental sulfur. Thus, this H_2S Contingency Plan (the "H_2S Plan" or "the Plan") is being submitted to document procedures that are to be followed in the event of an H_2S release that occurs at any location on the Plant.

This plan complies with **New Mexico Oil Conservation Division (OCD) Rule 11*(§ 19.15.11 et. seq. NMAC).*** The plan and operation of the DCP Linam Facility conform to standards set forth in ***API RP-55 "Recommended Practice for Oil and Gas Producing and Gas Processing Plant Operations Involving Hydrogen Sulfide" as well as API RP 49 "Recommended Practice for Drilling and Well Servicing Operations Involving Hydrogen Sulfide" and API RP 68 " Oil and Gas Well Servicing and Workover Operations involving Hydrogen Sulfide", and applicable NACE standards for sour gas service and current best management practices.*** The Eunice does not have any storage tanks in which H_2S or other gas or gas products are stored, and thus, API regulations and OCD regulations (specifically 19.15.11.12.E NMAC) relative to those types of storage are not applicable for this plant. The terms used in this Plan are used as defined in Title 19 Chapter 15 Part 11 of the New Mexico Administrative code (19.15.11.7-Definitions) unless otherwise defined herein. When the term "shelter-in-place" is used in this plant, it means that individuals should go inside homes, businesses, etc., turn off heating and air conditioning systems, close windows and doors and put towels or tape around doors and/or windows that are not sealed and wait for further instruction.

II. SCOPE [API RP-55 7.2]

This Plan is specific to the Eunice Gas Processing Plant. It contains procedures to provide an organized response to an unplanned release of H_2S from the Plant and documents procedures that would be followed to alert and protect any members of the public, residents in surrounding areas and/or contractors working on or around the Plant in the event of an unplanned release. This Plan has been prepared to minimize the hazard resulting from an H_2S release. It will be used to inform company personnel, local emergency responders and the general public of actions to be taken before, during and after an H_2S release. All operations shall be performed with safety as the primary goal. The primary concern of the Eunice Gas Plant, should an H_2S release occur, is to protect the public, contractors and company employees; the secondary concern is to minimize the damage and other adverse effects of the emergency. In the event of a release, any aspect of the Plant's operation that might compromise the safety of individuals will cease until the operation can be re-evaluated and the proper engineering controls to assure safety can be implemented. No individual should place the protection of the Plant property above his or her own personal safety.

In a serious situation involving an H_2S release, not only are the Eunice Plant personnel involved, but local Fire Departments, Law Enforcement, County and even State of New Mexico agencies may be interested parties. Cooperation will expedite all decisions. In any emergency situation involving a H_2S release, delegation of duties will be made to appropriate employees and groups. These duties will be reviewed on an annual basis to ensure complete understanding and facilitate a well-coordinated response by all involved personnel to the emergency situation.

III. PLAN AVAILABILITY [API RP-55 7.3]

This H_2S Plan shall be available to all personnel responsible for implementation, regardless of their normal location assignment. A copy of the Plan will be maintained at the Eunice Plant Control Room, in the Plant Supervisor's office at the Plant, in the Asset Manager's office at the Hobbs office, and at the Permian Region Safety Manager's office in Midland, Texas. See Appendix D for a complete H_2S Plan Distribution List.

IV. EMERGENCY PROCEDURES [NMAC 19.15.11.9.B(2)(a)] [API RP-55 7.4 a] [29 CFR 1910.1200]

RESPONSIBILITIES AND DUTIES OF PERSONNEL DURING AN EMERGENCY

It is the responsibility of all personnel on-site to follow the safety and emergency procedures outlined in the H_2S Plan as well as the following documents:

- DCP Safe Work Practices
- DCP Eunice Plant Emergency Response Plan, Groundwater Discharge Plan, and Oil Spill Contingency Plan; and
- DCP Environmental Policies and Programs.

The Plant uses the Incident Command System (ICS) for emergency response. The ICS structure used is based on the National Interagency Incident Management System (NIIMS) and is consistent with the National Contingency Plan (NCP). All Plant employees shall be prepared to respond to an H_2S emergency at the Plant. In every incident, command must first be established. (Figure 4 is a diagram of the DCP Incident Command Structure.) The first person to discover the problem is, by default, the Incident Commander (IC) until this responsibility is transferred to someone else. This responsibility should be formally transferred to the Facility/Field Supervisor as soon as practical. Who is acting as the IC should be clear and apparent at all times.

The IC is responsible for the overall management of the incident. When the IC does not delegate or assign a position, the IC retains that responsibility. The IC should have no more than 5 to 8 direct reports. The IC establishes the strategy and goals for the incident and is ultimately responsible for the safety and success of the response activities.

An Operations Chief is responsible for implementing the strategy to accomplish the goals defined by the IC. The Operations Chief directs all tactical operations, oversees response personnel and may assist the IC in the development of the action plan.

The Safety Officer is assigned by and reports directly to the IC. This position is responsible for identifying hazardous or unsafe situations, and developing measures necessary to assure the safety of response personnel and any victims of the incident. He/she should ensure that any personnel responding to the incident are using the proper Personal Protective Equipment (PPE) and have adequate training. The Safety Officer has the authority and responsibility to terminate or suspend operations that he believes are unsafe or will place people in imminent danger.

In the event of an accidental release which results in the activation of the H_2S Plan all Plant personnel and visitors will be evacuated out of the affected area. The Plant Supervisor or designee shall determine:

1) Plant Shutdowns
2) Isolation of pipeline segments
3) Repairs, tests or restarts as required

If an emergency occurs, the Plant Supervisor, or designee, shall be notified first. The Plant Supervisor, or designee, shall initiate activation of the DCP Crisis Management Plan by notifying the Southeast New Mexico Asset Manager who will notify the Regional Operations Vice President, and the Regional Operations Vice President shall contact the Permian Business Unit President. If any person in this chain of command is unavailable, the DCP employee shall elevate the communication to the next level. The intention of this process is to allow the IC to make one phone call and then be able to focus on the incident response.

Site Security

In order to have an accurate listing of all personnel on-site in the event of an emergency, a daily sign-in log sheet is utilized. The sign-in log sheet includes at a minimum the person's name, the company name, the time of arrival, and the time of departure. All personnel are required to sign in at the Eunice Plant Office and Control Room. The IC or designee shall be responsible for assuring that all personnel sign-in upon arrival and sign-out upon departure from the job site. The IC may assign the responsibilities for the daily sign-in log sheet to an individual designated as the Record Keeper or another designee. At the discretion of IC, a security coordinator and/or a security team may be established, and the access to the job site restricted.

Discovery and Internal Reporting

All personnel, including contractors who perform operations, maintenance, and/or repair work in sour gas areas within the Plant wear personal H_2S monitoring devices to assist them in detecting the presence of unsafe levels of H_2S. When any individual, while performing such work, discovers a leak or emission release they are to attempt to resolve the issue as long as H_2S levels remain below 10 ppm. The personal monitoring devices they wear will give off an audible alarm at 10 ppm. If the response action needed to resolve the issue is more than simply closing a valve or stopping a small leak, the individual shall notify the Plant Supervisor or designee and convey, at a minimum, the following information:

- Name, telephone number, and location of person reporting the situation
- Type and severity of the emergency
- Location of the emergency and the distance to surrounding equipment and/or structures
- The cause of the spill or leak, name and quantity of material released, and extent of the affected area including the degree of environmental hazard
- Description of injuries and report of damage to property and structures

A Chronological Record of Events Log (see Appendix E) should also be initiated. This log should record the time, date, and provide a summary of the event.

IMMEDIATE ACTION PLAN

The following outlines the Immediate Action Plans that will be implemented in the case of activation of the H_2S Plan. Response Flow Diagrams in Appendix A also provide a summary of actions to be taken during Plan activation. Response levels are the same for any release at the Plant. These procedures and decision processes have been designed to ensure a coordinated, efficient and immediate action plan for alerting and protecting operating personnel and the public as well as to prevent or minimize environmental hazards and damage to property. Emergency response actions may be initiated for a variety of situations. The Plan is activated in progressive levels (Levels I, II and III), based on the concentration and duration of H_2S that has been released (See pages 4-6 of this Plan for details about activation levels). **Eunice Plant Operators are authorized to elevate the level of response, based on**

observed conditions, if they determine that a lower level response may not be effective in protecting personnel, the public, or the environment. Additional or long-term response actions will be determined on a case-by-case basis, if needed, once the Incident Command Center (ICC) and ICS are established following the immediate response.

LEVEL I ACTIVATION

Alarms:
Flashing yellow lights are activated at any fixed monitor that senses H_2S at 10 ppm or greater. All employees also wear personal monitors that sound an audible alarm at 10 ppm H_2S or greater. An audible intermittent plant evacuation alarm sounds if any sensor detects H_2S at 90 ppm. The audible alarm and flashing yellow lights are redundant systems which function independently of one another so that should one system fail, the other would remain active. These systems incorporate back-up battery capabilities as recommended in API RP 55 which insure their operation in the event of a power failure.

Actions:

1. At the initial sound of an audible alarm or the sight of the flashing yellow beacon, assigned operators in the vicinity of the alarm will put on 30 minute Self-Contained Breathing Apparatus (SCBAs), help any persons in distress and then attempt to resolve the release. There are a minimum of three operators at the Plant at any one time, and at least 17 SCBA devices are located where they are accessible to the operators (see Figure 2).
2. All other personnel in the vicinity of the alarm shall evacuate to a safe area outside the range of the release and wait for further instruction.
3. Operators (wearing SCBAs) will then assess the location of the alarm and attempt to make an initial determination of its cause and to rule out potential false alarms, based on sensor malfunction or other conditions. If the cause of the release is a minor problem such as a packing or seal leak, the operators will take the necessary steps to correct the situation and eliminate the source of the release.
4. If the release cannot be resolved and H_2S levels reduced below 10 ppm within ten minutes, ICS will be implemented and the IC shall activate a Level I response; all personnel shall evacuate to Emergency Assembly Area I (see Figure 3) and all will be accounted for using the Plant sign-in sheets. The H_2S levels at Emergency Assembly Area I will be monitored with hand-held and/or personal monitors and with fixed monitors. If H_2S concentrations are 10 ppm or greater then all personnel will evacuate to Emergency Assembly Area 2, using specified emergency Evacuation Routes (see Figure 3).
5. IC or designee will maintain a Chronological Record of Events Log (see Appendix E).
6. If deemed necessary by the IC, local emergency response service providers will be contacted by Plant personnel designated by the IC (see Appendix B).
7. If one or more fixed monitors are activated at 10 ppm H_2S for longer than ten minutes, all entities within the 500 ppm Radius of Exposure (ROE) will be notified by telephone of the release (see Appendix B). Notification will be done by personnel designated by the IC. The nature of the release and status of containment will be conveyed. The entities on the 500 ppm ROE list will be advised to notify their employees working in the 500 ppm ROE of the release and to alert any third-party contractors or service companies who might be working for them or imminently scheduled to work in that area of the release. All of these entities will be instructed to either to evacuate the area immediately and to not enter/re-enter the 500 ppm ROE until further notice or to shelter-in-place.
8. If a Level I Response is initiated, roadblocks will be established to prevent entry into the 500 ppm ROE (see Figure 3).
9. The IC will set up secondary re-entry team(s) with 30 minute SCBAs to re-enter and resolve the situation. Re-entry will occur in 15 minute shifts at the direction of the IC until the problem is resolved or the emergency shutdown (ESD) is activated.
10. If the release is resolved and monitored H_2S levels in the Plant are less than 10 ppm, personnel may re-enter the Plant. If the release is not resolved within twenty minutes and H_2S levels continue to increase, a Level II Response is indicated.
11. DCP shall notify The Oil Conservation Division (OCD) within four hours of any release that activates the Plan at Level I. **Per 19.15.11.16 NMAC, notification of Contingency Plan implementation will be submitted to the OCD via form C-141 within 15-days of release.**

LEVEL II ACTIVATION

Alarms:
Flashing yellow lights are activated at any fixed monitor that senses H_2S at 10 ppm or greater. All employees also wear personal monitors that sound an audible alarm at 10 ppm H_2S or greater. An audible intermittent plant evacuation alarm sounds if any sensor detects H_2S at 90 ppm. The audible alarm and flashing yellow lights are redundant systems which function independently of one another so that should one system fail, the other would remain active. These systems incorporate back-up battery capabilities as recommended in API RP 55 which insure their operation in the event of a power failure. If any single audible alarm or flashing beacon alarm cannot be resolved within twenty minutes, then a Level II response is also indicated.

Actions:

1. At the initial sound of the alarm or observance of the flashing beacons, the operators in the vicinity of the release will have put on SCBAs and helped any persons in distress.
2. If the release cannot be resolved within twenty minutes, all personnel will evacuate to Emergency Assembly Area 2, using designated Evacuation Routes (see Figure 2). At the assembly area all personnel will be accounted for using the Plant sign-in sheet.
3. ICC will be established at Emergency Assembly Area 2 (see Figure 3).
4. The H_2S levels at Emergency Assembly Area 2 will be monitored with hand-held or personal monitors. If H_2S concentrations reach 10 ppm or greater at Assembly Area 2, all personnel will evacuate to Assembly Area 3 (see Figure 3) and the ICC will be moved to Assembly Area 3.
5. If deemed necessary by the IC, local emergency response service providers (phone numbers provided in Appendix B) will be contacted by IC or designee.
6. IC or designee will initiate and maintain a Chronological Record of Events Log (see Appendix E).
7. All entities within the 100 ppm ROE will be contacted by phone (see Appendix B) and notified of the release. The nature of the release and status of containment will be conveyed. Depending on release status and prevailing wind conditions, some entities may be asked to shelter in place or evacuate. Entities within the 100 ppm ROE will be instructed to contact other employees or contractors not currently present and instruct them not to enter/reenter the area until further instruction.
8. The Local Emergency Planning Committee (LEPC) and law enforcement will be contacted by phone and notified of the release and status of containment (phone numbers listed in Appendix B). The IC will assign notification responsibility to Plant personnel.
9. Roadblocks will be set up to prevent access to the 100 ppm ROE areas, as shown in Figure 3.
10. Operator(s) with 30 minute SCBAs will continue to assess the release and attempt to resolve it. If after 20 minutes there is no resolution, the operator(s) will contact the IC to determine if a plant emergency shutdown (ESD) should be activated.
11. Re-entry will occur in full SCBA and in 15 minute shifts at the direction of the IC until IC determines that the problem has been resolved or ESDs are activated.
12. If release is resolved and monitored levels of H_2S in the Plant are less than 10 ppm, personnel may return to the Plant. All entities previously notified will be informed that the release has been resolved and advised of the current monitored H_2S levels at the Plant.
13. Plant personnel will continue monitoring H_2S levels after problems are abated, as directed by the IC.
14. If the release is not resolved within one hour and/or H_2S levels continue to increase, a Level III Response is indicated.
15. DCP will notify The Oil Conservation Division (OCD) within four hours of any release that activates the Plan. **Per 19.15.11.16 NMAC, notification of contingency plan implementation will be submitted to the OCD via form C-141 within 15-days of release.**

LEVEL III ACTIVATION

A Level III Response is indicated in the event of a catastrophic release, fire, explosion or a continuous release of maximum volume for 24 hours; or as per NMAC 19.15.11 there is indication of 100 ppm H_2S in any defined public area, 500 ppm at any public road, or 100 ppm at a distance greater than 3,000 feet from the site of the release. A Level III response is also indicated if H_2S if repair efforts at Level II have been unsuccessful after one hour from the start of the release.

Alarms:

Flashing yellow lights are activated at any fixed monitor that senses H_2S at 10 ppm or greater. All employees also wear personal monitors that sound an audible alarm at 10 ppm H_2S or greater. An audible intermittent plant evacuation alarm sounds if any sensor detects H_2S at 90 ppm. The audible alarm and flashing yellow lights are redundant systems which function independently of one another so that should one system fail, the other would remain active. These systems incorporate back-up battery capabilities as recommended in API RP 55 which insure their operation in the event of a power failure. If an audible alarm or flashing beacon alarm cannot be resolved within one hour, then a Level III response is indicated. There is also a manual H_2S evacuation alarm that the operators can activate from the control room in the event of a Level III Response.

Actions:

1. Operators will immediately put on SCBAs, and upon suit-up will first help any persons in distress.
2. ESD procedures at the Plant will be implemented immediately if a Level III Response is initiated. The Plant Evacuation Alarm will be activated and all personnel will be instructed to report to Emergency Assembly Areas 3. At the assembly area all personnel will be accounted for using the Plant sign-in sheets.
3. Roadblocks will be set up to prevent access to the 100 ppm ROE areas, as shown in Figure 3.
4. IC or designee will confirm that all personnel, visitors and contractors have evacuated to Emergency Assembly Area 3.
5. An ICC will be established at Emergency Assembly Area 3 (see Figure 3).
6. IC or designee will confirm evacuation of all entities within the 500 ppm ROE (which is initiated at Level I).
7. IC or designee will confirm that all emergency responders, LEPC and law enforcement have been notified of the release.
8. All individuals within the 100 ppm ROE will already have been and notified either to evacuate or to shelter in place. The IC will review the status of evacuation and make the final decision whether individuals within the 100 ppm ROE should evacuate or shelter in place, based on, but not limited to H_2S concentration and wind direction and whether a safe evacuation can be implemented.
9. If escaping vapors have ignited, the vapors should be allowed to continue to burn unless the fire endangers personnel, other property, or other equipment.
10. IC or designee will maintain a Chronological Record of Events Log (see Appendix E).
11. DCP will establish a media staging area adjacent to the Level III Emergency Evacuation Area and direct all media to it (see Figure 3).
12. Once the release is resolved and monitored levels in the Plant and Emergency Evacuation Areas are less than 10 ppm, roadblocks will be removed, and all entities within the 100 ppm ROE will be allowed to return. All entities previously notified will be informed that the release has been resolved and advised of the current monitored H_2S levels.
12. Monitoring will continue after problems are abated, at the direction of the IC.
14. DCP will notify The Oil Conservation Division (OCD) within four hours of any release that activates the Plan. **Per 19.15.11.16 NMAC, notification of contingency plan implementation will be submitted to the OCD via form C-141 within 15-days of release.**

TELEPHONE NUMBERS, COMMUNICATION METHODS AND MEDIA SITE

Telephone Numbers and Communication Methods

In the event of activation of the Plan, emergency responders, public agencies, local government and other appropriate public authorities must be contacted. **Telephone contact information for those entities in included in Appendix B.**

Media Site

If a Level II Response occurs, the IC will designate a Media Site at or adjacent to Emergency Assembly Area 2 (see Figure 3). If a Level III Response occurs, the IC will designate a Media Site at or adjacent to Emergency Assembly Area 3 (see Figure 3). The IC will either designate a Media Liaison Officer or assume these duties personally.

Under no circumstances will media personnel be allowed inside the warm or hot zone (greater than 10 ppm H_2S). Media personnel may only enter an area once the area has been monitored and restored to a cold zone (less than 10 ppm H_2S) and the IC has approved their entry. Media personnel shall not be allowed to enter DCP property without the approval of the DCP Asset Manager or his designee, and shall be escorted by DCP personnel at all times.

LOCATION OF OPERATORS, RESIDENCES, BUSINESSES, ROADS AND MEDICAL FACILITIES

Public awareness and communication is a primary function of the H_2S Plan. DCP has compiled a list of contacts that are to be notified at various phases during the activation of the Plan. The Response Flow diagrams in Appendix A and the Level I, II and III Immediate Action Plans (pages 5 - 7) indicate when certain entities are to be contacted in event of activation of this Plan. Appendix B contains a listing of all entities in public areas (as defined in NMAC 19.15.11.7.I) that will be contacted in the event of activation of the H_2S Plan, and it provides the contact information for all producers with wells located within the 500 ppm and 100 ppm ROE. DCP will inform all state and local response organizations of its Plan. All Operators who have wells within the 500 ppm and 100 ppm ROE will be contacted by telephone by Plant personnel as designated by Plant Supervisor if the Plan is activated, and action will be based on response level as described in the Immediate Action Plan section of this document, as referenced above. All entities contacted will be advised of the following:

- The nature and extent of the release/emergency at the Plant and recommendations for protective actions, such as evacuation or shelter-in-place
- Any other event specific information that is necessary to protect the public
- Updated status of the release and continued safety measures to be taken, including but not limited to when to evacuate and/or when it is safe to return to the area.

Operators:

There are a number of active wells in the 500 and 100 ppm ROE. A list of those operators along with emergency contact information is included in Appendix B. Should the plan be activated, these operators will be contacted and told to immediately evacuate to a designated evacuation area and not return until they are notified by DCP that it is safe to do so.

Public Roads:

Public roads located within the 100 and 500 ppm ROE of the Plant are shown on Figure 3. The Plant maintains emergency trailers, equipped with flashing lights, windsocks, and roadblock signs for use in alerting the public of hazardous conditions on any of these three roads. Eunice Plant personnel will be

dispatched to establish roadblocks on these roads to prevent entrance into the 500 and/or 100 ppm ROE, depending on the response level (see Figure 3). Roadblocks will be established in designated areas, regardless of wind direction at the time of the incident.

Businesses or Other Public Areas
Utilizing the definition in NMAC 19.15.11.7.I, entities in Public Area including businesses and residences within the 500 and 100 ppm ROE must be contacted in the event of activation of this plan. At the time of submission of the plan, there are no individual residences within the ROE. There are a number of producers with wells inside the ROE, and those are listed in Appendix B. The only businesses within the ROE are an equipment storage yard and a small bulk plant that belong to XTO Energy, who is also a producer. In the event of activation of the plan, DCP personnel, as designated by the IC, will make a visual inspection of the 500 and 100 ppm ROE area to insure that no individuals are seen inside the ROE. If any are observed, they will be advised to evacuate immediately to a designated Emergency Evacuation Area (see Figure 3). This plan will be updated annually, and the 500 and 100 ppm ROE area will be checked annually to insure that there are no residences within the ROE.

Medical Facilities:
There are no medical facilities located within the ROE.

EVACUATION ROUTES, EMERGENCY ASSEMBLY AREAS AND ROAD BLOCK LOCATIONS

Evacuation Routes and Emergency Assembly Areas
Figures 2 shows the Plant plot plan and evacuation routes. The locations of Emergency Assembly Areas are shown on Figure 3. Evacuation for all visitors and all DCP personnel that are not operators begins at the 10 ppm H_2S intermittent alarm and flashing yellow beacon. The responding Plant operator(s) are to put on the 30-minute SCBA and first determine if any personnel are in distress and assist any distressed personnel to evacuate to Emergency Assembly Area 1. Emergency services (911) will be contacted if there are injuries or as otherwise deemed necessary. Then the operators, wearing the SCBAs, will investigate the cause of the release. The alarm and flashing beacons will signal all other personnel in the Plant that they are to stop work, check the prevailing wind direction (using visible windsocks) and immediately proceed along designated evacuation routes and/or upwind to the pre-designated Emergency Assembly Areas that are shown in Figure 3. Prevailing winds for the area are from the southwest. Personnel should evacuate along the designated route unless that route is downwind of the release (based on the wind directions observed at the windsocks); in that event all evacuees should proceed perpendicular and then upwind to the Emergency Assembly Areas.

Roll call shall be conducted at the Emergency Assembly Area to ensure all personnel (including contractors and visitors) are accounted for and have evacuated safely. The Eunice Plant is a Process Safety Management (PSM) facility and requires all personnel to check-in and sign-in at the Plant Office or Plant Control Room before entering the Plant. The sign-in sheet will be used at the Emergency Assembly Areas to make a full accounting of all personnel and visitors.

At each Emergency Assembly Area, the ambient air quality will be monitored for H_2S concentration to ensure the area remains at less than 10 ppm. If the H_2S concentration rises to 10 ppm or greater, the assembly area will be relocated as specified in the detailed response description.

Road Block Locations
Pre-planned road block locations (which would be utilized in the event of a Level II or Level III response) are shown on the ROE Map (Figure 3). The IC will designate representatives to staff each of the roadblocks. Road Block Kits are located at the egress stations for easy access if the facility is evacuated. Company vehicles are also equipped with roadblock kits. If deemed necessary by the IC, the State or Local Police will be asked to assist with maintaining the roadblocks. Upon activation of the Plan, roadblocks will be established at designated areas, regardless of wind direction since winds can shift unexpectedly.

MONITORING EQUIPMENT, ALARM SYSTEMS, SAFETY EQUIPMENT AND SUPPLIES

Monitoring Equipment

Fixed Monitors: DCP has installed fixed-point ambient H_2S detectors strategically throughout the Plant in key locations to detect possible leaks. The locations of these detectors are shown in Figure 2. Upon detection of H_2S at 10 ppm at any detector, a visible beacon is activated at that detector and an alarm is sounded in the Distributed Control System (DCS). If hydrogen sulfide levels at 90 ppm on any single monitor, an evacuation alarm is sounded throughout the plant. Plant operators are able to monitor the concentration of H_2S of all the Plant sensors on the DCS located in the control room. Figure 2 shows the locations of these sensors. All H_2S sensors are calibrated quarterly.

Personal and Handheld H_2S Monitors: All personnel working in Eunice Plant wear personal H_2S monitors. The personal monitors are set to alarm and vibrate at 10 ppm. Handheld gas detection monitors are available to Plant personnel to check specific areas and equipment prior to initiating maintenance or work on the process or equipment. There are four handheld monitors in the control room for use by individuals for special projects and maintenance work. The hand- held gas detectors have sensors for oxygen, LEL (explosive hydrocarbon atmospheres), H_2S and CO_2.

Alarms, Visible Beacons and Wind Indicators
Colored beacons, horns, and wind direction indicators are situated in various locations throughout the Plant. A flashing yellow beacon signifies an H_2S release of 10 ppm. The audible signal for Activation of the H_2S Contingency Plan and Plant evacuation is a repeating intermittent alarm that sounds at 90 ppm H_2S. The locations of fixed H_2S monitors through the Plant are shown on Figure 2. Wind direction indicators are also installed throughout the Plant. At least one wind direction indicator can be seen at any location within the Plant as well as from any point on the perimeter of the Plant.

Emergency Shutdown Systems
DCP Midstream has installed automatic and manually activated emergency shutdown system (ESD). The plant operator and/or IC may use these systems to shut down and isolate the equipment in the plant. This is a fail-safe system that will shut valves and equipment if any portion of the system fails.

When activated the ESD shuts automatic valves on all inlet gas feed streams, shuts automatic valves on all outlet gas and Natural Gas Liquid (NGL) product streams, and closes several key automatic valves within the plant to isolate individual sections of the plant. In addition the main fuel gas supply and boiler fuel supply is shut off and major equipment is shut down. The locations of the ESD activation buttons/isolation valves are shown on Figure 2. The ESD systems are designed to prevent the need for a Level III response.

The Plant ESD can be activated at any time by the Eunice Plant Operators and is to be activated based on this Plan after 10 ppm H_2S has been detected at any two monitors or 90 ppm is detected at any one

monitor at the Plant, or if a catastrophic release has occurred**.** Additional isolating block valves outside the Plant perimeter on the incoming lines can be closed to prevent further gas flow into the Plant. The block valves furthest upstream can isolate the entire system from the field gathering lines coming into the Plant.

Process Purge System
All vessels, pumps, compression equipment, and piping are designed and equipped to allow purging with pipeline quality gas to remove the acid gas prior to conducting maintenance or inspection work. The purge gas stream with residual acid gas is routed safely into the acid gas flares located at the Plant. Operating procedures include this purging of all equipment to avoid acid gas exposure to personnel and to prevent acid gas from escaping to the environment.

First Aid Equipment
The first aid station will be located at the Emergency Assembly Area. (Also see Figure 2 for locations of emergency and safety equipment on the Plant.) First aid kits are also available in the following locations:

- Plant Superintendent Office and Safety Office Building
- Each company vehicle
- Plant Supervisor's office
- Eunice Control Room
- Emergency Trailer

Respirators
There are 30-minute SCBA respirators and cascade hose reel systems strategically located throughout the Plant. The cascade hose reel systems have 1-4 compressed air cylinder trailers to provide a sustained supply of breathing air for extended work time in a hazardous atmosphere. Each cylinder will supply a person 6-8 hours of breathing air at normal workloads or 3 hours at medium/heavy workloads. Several hose reels and masks may be attached to a cascade system. The system is equipped with a low pressure alarm to allow workers to safely exit the hazardous area with plenty of reserve air capacity. The respirator containers and equipment locations are shown in Figure 2. All Plant personnel are trained and fit tested annually to use the SCBA respirators.

Vehicles and Equipment
Communications to DCP field personnel is via cellular telephones or two-way radios, and each DCP field truck is also equipped with a fire extinguisher. Company vehicles are equipped with emergency breathing air units, two-way radios, roadblock kits and mobile phones.

Fire Fighting Equipment
Plant personnel are trained only for incipient stage fire-fighting. Fire extinguishers are located in the Plant process areas, compressor buildings, process buildings, and company vehicles. The Eunice Plant contains a fixed monitor firewater system along with portable fire extinguishers that may be used in an emergency. Two gas-fired turbines are equipped with fire and gas detection monitors that tie into localized automatic CO_2 fire suppression systems.

SIGNS AND MARKERS NMSA 19.15.11.10

Pursuant to NMSA 19.15.11.10, the Plant has readily readable warning, caution and notice signs which conform to the current ANSI standard Z535.1-2002 (Safety Color Code). The Plant has numerous warning signs indicating the presence of H_2S/Poisonous Gas and high pressure gas at the entrances to the

Plant as well as around the perimeter of the plant in order to warn the public. These signs are easily readable from the road and contain the language “Caution Poisonous Gas May Be Present”. Emergency response phone numbers are posted at the entrance to the Plant. Signs are located at the Plant gate entrances indicating that all visitors are to sign in at the Plant office.

V. CHARACTERISTICS OF HYDROGEN SULFIDE (H_2S), SULFUR DIOXIDE (SO_2) and CARBON DIOXIDE (CO_2) [NMAC 19.15.11.9.B(2)(b)] [API RP-55 7.4 b.]

Hydrogen Sulfide (H_2S): The current inlet gas streams into the Plant contain approximately 6,500 ppm (.65 mole percent) of H_2S based on data generated from the sampling of the combined inlet gas stream. H_2S is a colorless, toxic and flammable gas, and has the odor of rotten eggs. It is heavier than air and presents a significant health hazard by paralyzing the respiratory system resulting in serious injury or death.

Hydrogen Sulfide Properties and Characteristics	
CAS No.	7783-06-4
Molecular Formula	H_2S
Molecular Weight	34.082 g/mol
Ceiling Concentration	20 ppm (OSHA)
Ceiling Peak Concentration	50 ppm (OSHA)
Threshold Limit Value (TLV)	15 ppm (ACGIH)
Time Weighted Average (TWA)	10 ppm (NIOSH)
Short Term Exposure Level (STEL)	15 ppm (ACGIH)
Immediately Dangerous to Life or Health (IDLH)	100 ppm
Specific Gravity Relative to Air (Air=1.0)	1.189
Boiling Point	-76.5F
Freezing Point	-121.8F
Vapor Pressure	396 psia
Auto-ignition Temperature	518F
Lower Flammability Limit	4.3%
Upper Flammability Limit	46.0%
Stability	Stable
pH in water	3
Corrosivity	Reacts with metals, plastics, tissues and nerves

Physical Effects of Hydrogen Sulfide		
Concentration		**Physical Effects**
Ppm	%	
1	0.00010	Can be smelled (rotten egg odor).
10	0.0010	Obvious & unpleasant odor; permissible exposure level; safe for 8 hour exposure.
20	0.0020	Acceptable ceiling concentration.
15	.005	Short Term Exposure Limit (STEL); safe for 15 minutes of exposure without respirator.
50	0.0050	Loss of sense of smell in 15 minutes.
100	0.0100	Immediately dangerous to life and health (IDLH) loss of sense of smell in 3-15 minutes; stinging in eyes & throat; altered breathing.
200	0.0200	Kills smell rapidly; stinging in eyes & throat.
500	0.0500	Dizziness. Unconscious after short exposure. Need artificial respiration.
700	0.0700	Unconscious quickly--death will result if not rescued promptly.
1000	0.1000	Instant unconsciousness followed by death within minutes.

Sulfur Dioxide (SO_2): SO_2 is produced as a by-product of H_2S combustion. The waste gas stream consisting of H_2S and CO_2 is routed to the Plant acid gas flare during abnormal conditions when the acid gas injection equipment is out of service. Waste gas is routed to the acid gas flare during maintenance operations when equipment needs to be blown down. It is colorless, transparent, and is non-flammable, with a pungent odor associated with burning sulfur. SO_2 is heavier than air, but can be picked up by a breeze and carried downwind at elevated temperatures. It can be extremely irritating to the eyes and mucous membranes of the upper respiratory tract.

Sulfur Dioxide Properties & Characteristics	
CAS No.	7446-09-5
Molecular Formula	SO_2
Molecular Weight	64.07 g/mol
Permissible Exposure Limit (PEL)	5 ppm(OSHA)
Time Weighted Average (TWA)	2 ppm(ACGIH)
Short Term Exposure Level (STEL)	5 ppm(ACGIH)
Immediately Dangerous to Life and Health (IDLH)	100 ppm
Specific Gravity Relative to Air (Air = 1.0)	2.26
Boiling Point	14°F
Freezing Point	-103.9°F
Vapor Pressure	49.1 psia
Auto-ignition Temperature	N/A
Lower Flammability Limit	N/A
Upper Flammability Limit	N/A
Stability	Stable
Corrosivity	Could form an acid rain in aqueous solutions

Physical Effects of Sulfur Dioxide	
Concentration	**Effect**
1 ppm	Pungent odor--may cause respiratory changes.
2 ppm	Permissible exposure limit; safe for an 8 hour exposure.
3-5 ppm	Pungent odor; normally a person can detect SO_2 in this range.
5 ppm	Short Term Exposure Limit (STEL); safe for 15 minutes of exposure.
12 ppm	Throat irritation, coughing, chest constriction, eyes tear and burn .
100 ppm	Immediately Dangerous To Life & Health (IDLH)
150 ppm	So irritating that it can only be endured for a few minutes.
500 ppm	Causes a sense of suffocation, even with first breath.
1,000 ppm	Death may result unless rescued promptly.

Carbon Dioxide (CO_2): The current inlet gas streams to the Plant contain approximately 1.1 mole% CO_2. CO_2 is a colorless, odorless and non-flammable. It is heavier than air.

Carbon Dioxide Properties & Characteristics	
CAS No.	124-38-9
Molecular Formula	CO_2
Molecular Weight	44.010 g/mol
Time Weighted Average (TWA)	5,000 ppm
Short Term Exposure Level (STEL)	30,000 ppm
Immediately Dangerous to Life and Health (IDLH)	40,000 ppm
Specific Gravity Relative to Air (Air = 1.0)	1.5197
Boiling Point	-109.12°F
Freezing Point	-69.81°F
Vapor Pressure	830 psia
Auto-ignition Temperature	N/A
Lower Flammability Limit	N/A
Upper Flammability Limit	N/A
Stability	Stable
pH in Saturated Solution	3.7
Corrosivity	Dry gas is relatively inert & not corrosive; can be corrosive to mild steels in aqueous solutions.

Physical Effects of Carbon Dioxide	
Concentration	**Effect**
1.0 %	Breathing rate increases slightly.
2.0 %	Breathing rate increases to 50% above normal level. Prolonged exposure can cause headache, tiredness.
3.0 %	Breathing rate increases to twice normal rate and becomes labored. Weak narcotic effect. Impaired hearing, headache, increased blood pressure and pulse rate.
4 – 5 %	Breathing increases to approximately four times normal rate, symptoms of intoxication become evident, and slight choking may be felt.
5 – 10 %	Characteristic sharp odor noticeable. Very labored breathing, headache, visual impairment, and ringing in the ears. Judgment may be impaired, followed within minutes by loss of consciousness.
10 – 100 %	Unconsciousness occurs more rapidly above 10% level. Prolonged exposure to high concentrations may eventually result in death from asphyxiation.

VI. RADII OF EXPOSURE [NMAC 19.15.11.7. K]

WORST CASE SCENARIOS: The basis for worst case scenario calculations is as follows:

- The worst case ROE for this Plan has been calculated utilizing the maximum TAG flow rate (24-hour rate) contained in the permit issued by OCD for this Plant which is 105 MMCFD, and it presumes that the H_2S content of the inlet gas is .65 mole percent (based on average daily inlet gas analysis).

- The worst case scenario ROE assumes an uncontrolled instantaneous release of a 24-hour volume of TAG at the Plant. Because the Plant is a throughput process Plant, it is impossible that the entire 24 hour-throughput volume of the Plant could be released instantaneously as is assumed in the worst case scenario calculations of the ROE. Further, the Plant's ESD systems would be activated in the event of an emergency and would prevent the flow of gas into the Plant compressors and equipment and route the acid gas safely to the Plant acid gas flare. However, to comply with NMAC 19.15.11, the worst case scenario calculations (assuming an instantaneous release of the 24-hour processing and/or TAG volume) are utilized here (see Appendix C for actual calculations).

The formulas for calculating the two radii of exposure (ROE) are as follows:

100 ppm ROE Calculation (as per 19 NMAC 15.11.7.K.1):
X=[(1.589)(hydrogen sulfide concentration)(Q)](0.6258)

500 ppm ROE Calculation (as per 19 NMAC 15.11.7.K.2):
X=[(0.4546)(hydrogen sulfide concentration)(Q)](0.6258)

Where:
X = radius of exposure in feet
"hydrogen sulfide concentration" = the decimal equivalent of the mole or volume fraction of hydrogen sulfide in the gaseous mixture
Q = Total 24-hour volume of gas in cubic feet per day (corrected for standard conditions of 14.73 psi absolute and 60 degrees Fahrenheit)

ROE FOR EUNICE PLANT WORT CASE SCENARIO

500-ppm ROE 2,734 feet (0.52 miles)
100-ppm ROE 5,982 feet (1.13 miles)

The ROE for the Plant is shown on Figure 3. This ROE pattern is designed to include the 100 ppm and 500 ppm radii for a potential worst case failure at any point in the system.

VII. FACILITY DESCRIPTION, MAPS AND DRAWINGS [NMAC 19.15.11.9.B (2)(c)] [API RP-55 7.4 c.]

Description of Eunice Plant Operations

The Plant operations include gas compression, treating and processing. The Plant gathers and processes produced natural gas from Eddy County, New Mexico. Once gathered at the Plant, the produced natural gas is compressed, dehydrated to remove the water content and processed to remove and recover natural liquids. The processed natural gas and recovered natural gas liquids are then sold and shipped to various customers. Because the natural gas that is gathered and processed at the Plant contains H_2S ("sour gas"), it must be treated or processed to remove it and other impurities. The CO_2 and H_2S stream that is removed from the natural gas in the amine treating process is compressed using electric driven, reciprocating compressors. Water vapor contained in the gas stream is removed during compression and cooling and is disposed of through a wastewater disposal system. The treated acid gas is then routed to the Sulfur Reduction Unit (SRU) which converts the H_2S to elemental sulfur using the Claus method. This native sulfur is then removed and sold or disposed of appropriately off-site. The CO_2 which is residual from the process is then vented to the atmosphere.

Maps of Plant

Figures 1 shows the location of the Eunice Plant. Figures 2 shows the plot plan of the Plant, and Figure 3 is the ROE map of the plant, showing the 100 and 500 ppm ROE, evacuation routes and emergency assembly locations. Figure 3a is a Topographic map with a wind direction rose diagram on it, showing the prevailing wind directions. As can be seen from Figure 3a, the Plant is located in a relatively flat area without much topography relative to low-lying areas where pockets of H_2S could settle.

VIII. TRAINING AND DRILLS [NMAC 19.15.11.9.B(2)(d)] [API RP-55 7.4 d.]

DCP will conduct annual training for its own personnel as well as for the public and emergency responders, as detailed below. Training will include:

- Characteristics of H_2S and safety precautions;
- An overview of the Eunice Plant and SRU operations;
- A review of their roles in responding to activation of the Eunice H_2S Contingency Plan;
- Location of the Radii of Exposure and how to protect the public within the Radii of Exposure;
- Potential roadblock locations, potential evacuation routes, and how they can assist in implementing the Plan.
- Procedures for sheltering-in-place.

Training of Essential Personnel

Annual training for DCP personnel shall include the Eunice Plant personnel, including Plant operators, mechanics, instrument and electrical technicians, and maintenance support personnel. Plant Operators will be responsible for initiating and implementing the Plan. In addition, all Plant personnel will receive:

- Annual training on the H_2S Contingency Plan: this training will include a review of all aspects of the Plan and will include, at a minimum, one table top drill involving activation of the H_2S Contingency Plan.
- Plant Orientation Training: all Plant personnel, visitors, and contractors must attend a Plant overview orientation prior to obtaining permission to enter the Plant. A refresher course on this training is required annually for all persons. Included as part of this orientation is how to respond and

evacuate safely in the event of a H_2S alarm or release. This training also complies with the requirements of the DCP and Eunice Plant's Process Safety Management Program and Procedures Manuals.

- All Plant personnel are also trained annually on the Eunice H_2S Contingency Plan.
- H_2S and SO_2 Training: all Plant personnel receive annual refresher training on H_2S and SO_2, which is conducted by DCP personnel. If an individual is unable to attend, they may be required to attend a third party training session. All contract employees are required to have had H_2S training and to provide the Plant a copy of their certification card prior to obtaining permission to enter the Plant.
- Respirators: all key Plant personnel are trained annually on the proper use of respirators. In addition to the annual training, all Plant key personnel are fit tested annually on the respirators. All Plant personnel must have medical clearance for respirator use.
- Hazard Communication: all Plant personnel are trained annually on Hazard Communication. The annual training includes, at a minimum, the use of material safety data sheets (MSDS) for those materials that are present at the Plant.
- Personal Protective Equipment (PPE): all Plant personnel are trained annually on the DCP requirements for PPE. The training includes, at a minimum, a review of all the types and levels of PPE and how to select the correct equipment for the job.

On-Site or Classroom Emergency Response Drills

- The Plant will conduct, at least, a tabletop drill annually. Multiple drills during the year may be scheduled at the discretion of the Plant Supervisor.
- The annual drill will execute this Plan and include, at a minimum, the Public Officials and Local Emergency Response Agencies listed in Appendix B and will also include making contact with the entities that are identified as being within the 500 ppm and 100 ppm ROE (listed in Appendix B) to make sure contact information for them is current. The drills will also include briefing of public officials on issues such as evacuation or shelter-in-place plans.

Notification of Producers Located Within the ROE

There are a number of producers within the 500 and 100 ppm ROE of the Plant. See Appendix B for a list of these producers. DCP will provide annual training to the producers listed in Appendix B which will include:

- An overview of the Eunice Plant and SRU operations
- Design and operating safety features on the Eunice Plant
- A review of the H_2S alarms and significance
- Notification procedures
- Roadblock locations
- Potential evacuation routes,
- Procedures for sheltering in place
- Radii of exposure

Training of Public Officials and Emergency Response Agencies

All of the Emergency Response Agencies listed in Appendix B will have copies of the H_2S Contingency Plan, and DCP will provide annual training to the following Emergency Response Agencies:

- NM State Police-Eunice Office
- Lea County 911 Emergency Response
- Lea County Local Emergency Planning Committee (LEPC)
- Eunice Police Department
- Eddy County Sherriff's Department

- State Emergency Response Commission
- Eunice Fire Department
- New Mexico Oil Conservation Division District Office (Hobbs)

Annual training will include:
- An overview of the Eunice Plant and SRU operations
- Design and operating safety features on the Eunice Plant
- A review of the H_2S alarms and significance
- Notification procedures
- Roadblock locations
- Potential evacuation routes,
- Procedures for sheltering in place
- Radii of exposure

DCP will also conduct, at a minimum, one annual tabletop drill instructing the emergency response organizations listed above on the activation of the Eunice Plant H_2S Contingency Plan.

Training and Attendance Documentation
Annual drill training will be documented, and those records will be maintained at the Plant Supervisor's Office. The documentation shall include at a minimum the following:

- Description or scope of the drill, including date and time
- Attendees and Participants in the drill
- Summary of activities and responses
- Post-drill debriefing and reviews

IX. COORDINATION WITH STATE EMERGENCY PLANS [NMAC 19.15.11.9.B(2)(e)]

NOTIFICATIONS AND REPORTS

The Plant has various notification and reporting obligations. Some are related to its state air quality permit that is overseen by the New Mexico Environment Department (NMED) as well as state and federal spill reporting obligations. In addition to the regulatory obligations noted above, Plant personnel also have internal and external notification and reporting obligations associated with the activation of this Plan. Reporting obligations are as follows:

New Mexico Oil Conservation Division (OCD) [NMAC 19.15.11.16]
As soon as possible, but no later than four hours after Plan activation, (recognizing that a prompt response should supersede notification), OCD will be notified by the IC or the IC's designee via email or fax to the District II Office of the activation of the H_2S Contingency Plan. In the event of a power failure, a phone call will be made within four hours. A full report of the incident to the OCD, utilizing Form C-141 (see Appendix F) shall be made no later than 15 days following the release.

New Mexico State Police/ New Mexico Hazardous Materials Emergency Response Plan
The New Mexico State Police are responsible for overall scene management and coordination of all resources. A designated Emergency Response Officer (ERO) will establish the National Interagency Incident Management System (NIIMS) and Incident Command System (ICS) and be responsible for management of all response resources on scene. Off-scene coordination of response resources will be

handled through designated Headquarters Emergency Response Officers. Law enforcement-related activities will be coordinated by State Police. (See Figure 4 for a diagram of DCP Incident Command Structure.)

X. PLAN ACTIVATION [NMAC 19.15.11.9.C] [API RP-55 7.4 d]

The Plan will be activated as described in the Emergency Response, Immediate Action Plan Section of this document (pages 4 -6). **At a minimum, Per NMAC 19.15.11.8.C, the Plan also shall be activated whenever a release may create an H_2S concentration of more than 100 ppm in a public area, 500 ppm at a public road or 100 ppm 3,000 feet from the site of release.**

Activation Levels:
This Plan has three activation levels that are described in detail in the Immediate Action Plan Section of this document and are outlined in the Response Flow Diagrams (see Appendix A). As soon as the Plan has been activated, based on the criteria below, the Plant Supervisor or his designee will be notified. Activation levels are as follows:

Level I: Flashing yellow beacons are activated if any fixed monitor registers H_2S at 10 ppm or greater. Personal and hand-held sensors throughout the plant also have audible alarms that activate at 10 ppm H_2S. If a release cannot be immediately resolved and H_2S levels reduced below 10 ppm at any one monitor within ten minutes, a Level I activation is implemented.

Level II: Flashing yellow beacons are activated if any fixed monitor registers H_2S at 10 ppm or greater. Personal and hand-held sensors throughout the plant also have audible alarms that activate at 10 ppm H_2S. An audible plant-wide evacuation alarm sounds if any sensors detect H_2S at 90 ppm and a Level II response is implemented. If repair efforts at Level I are unsuccessful and a release cannot be resolved and H_2S levels reduced below 10 ppm within twenty minutes, a Level II response is also implemented.

Level III: A Level III Response is indicated in the event of a worst case scenario catastrophic release, fire, explosion or a continuous release of maximum volume for 24 hours; and/or as per NMAC 19.15.11 there is indication of 100 ppm H_2S in any defined public area, 500 ppm at any public road, or 100 ppm at a distance greater than 3,000 feet from the site of the release. A Level III response is also indicated if H_2S repair efforts at Level II have been unsuccessful after one hour from the start of the release.

Events that Could Lead to a Release of H_2S
- Inlet and Plant piping failure
- Amine still failure
- Flange/gasket leaks on inlet and Plant piping
- Flange/gasket leak on the acid gas compressors
- Flange/gasket or valve packing leak at the SRU or in the associated piping
- Valve packing failure
- Seal failure on acid gas compressors
- Failure of flare to ignite during Plant emergency blow down
- Valve or seal failure or physical damage to SRU

XI. SUBMISSION OF H_2S CONTINGENCY PLANS [NMAC 19.15.11.9.D]

Submission
DCP submitted this revised H_2S Contingency Plan to the OCD for preliminary review in October 2014 and after receiving OCD feedback is submitting the plan for final review and approval in February 2015.

Retention
DCP shall maintain a copy of this H_2S Plan at the Eunice Gas Plant, at DCP Headquarters in Hobbs, NM and at DCP Headquarters office in Denver, CO. The Plan as approved by the OCD will be readily accessible for review by the OCD at the facility upon request.

Revisions to the Plan
The H_2S Plan will be reviewed annually and revised at that time as necessary to address changes to the Plant facilities, operations, training requirements, contact information , location of public areas including roads, businesses or residences potentially affected by the operations of the Plant--specifically those areas within the 100 and 500 ppm ROE.

Annual Inventory of Contingency Plans
On an annual basis, DCP will file an inventory of wells, facilities and operations for which H_2S Contingency Plans are on file with the OCD with the appropriate LEPC and the State Emergency Response Commission as per NMAC 19.15.11.9H. The inventory shall include the name, address, telephone number, and point of contact for all operations for which H_2S Contingency Plans are on file with the OCD. At the time of submission of this plan, there are no private residences within the 500 or 100 ppm ROE. At the time of the annual inventory, DCP will review the ROE to ascertain if any residences have been added inside the ROE over the course of the past year.

FIGURES

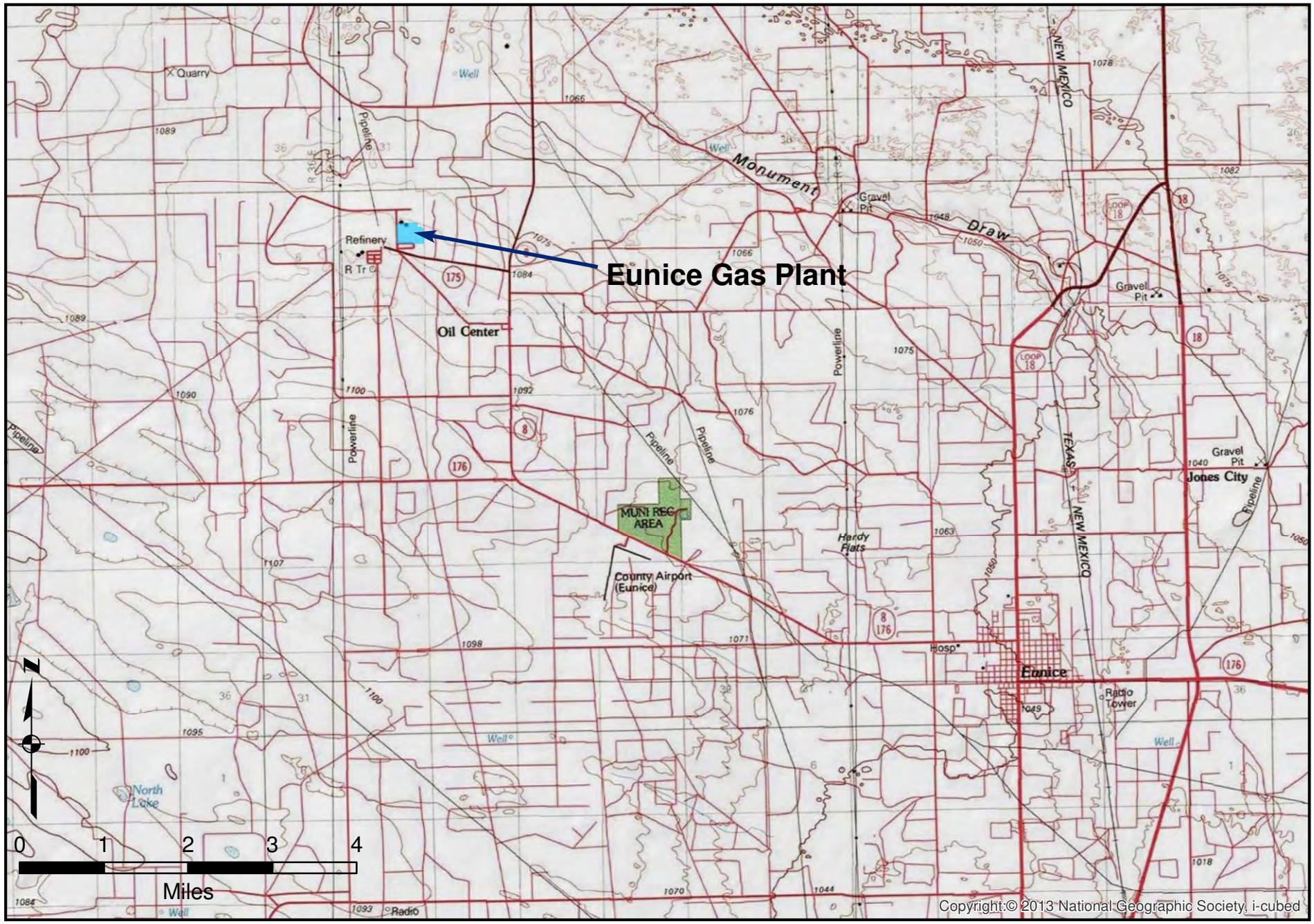
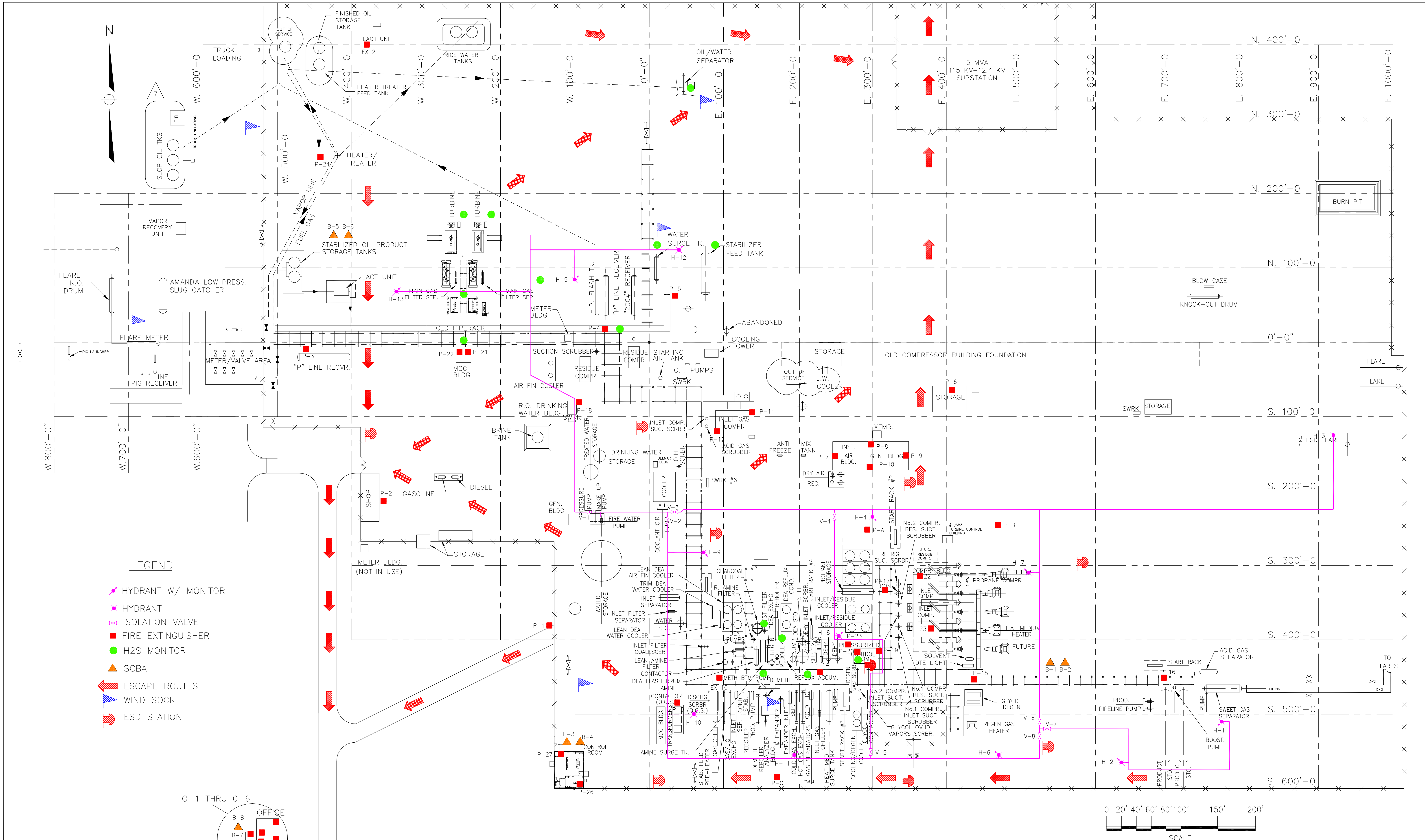


Figure 1: Location of Eunice Gas Plant, Lea County, New Mexico



REV.	DATE	REVISION	BY	CHK'D	ENGR.
1	2/21/97	ADDED SCBA LOCATIONS	JC		
2	6/20/97	REV. LOCATION OF SCBA & FIRE EXT.	JC		
3	5/17/99	MOVED B-3,4,7 & ADD P-24,25,26 & 27	JC		
4	1/18/00	ADDED 9 H2S MON. & REM. 1 MONITOR	JC		
5	2/8/02	REVISED PER FIELD COMMENTS	wrt		
6	9/11/02	UPDATED EQUIPMENT	wrt		
7	6/1/06	REVISED INLET SEPARATION EQUIPMENT	wrt		
8	2/9/07	CONSOLIDATED DWGS., CHANGED TITLE BLOCK	wrt		
9	2/4/15	ADDED ESD STATIONS, SOCKS & ESCAPE ROUTES	wrt		

NOTES:

FIGURE 2
Emergency Equipment, H2S Alarms,Evacuation Routes

dcp Midstream

EMERGENCY EQUIPMENT LOCATION PLAN

EUNICE PLANT — LEA COUNTY, NEW MEXICO

DRAWN: COLEMAN — DATE: 6/25/96

JA NO.	FILE NAME 07306M17
AFE NO.	SCALE 1"=60'
BASE NO. 07-3-06	
DWG. NO. M-26	9

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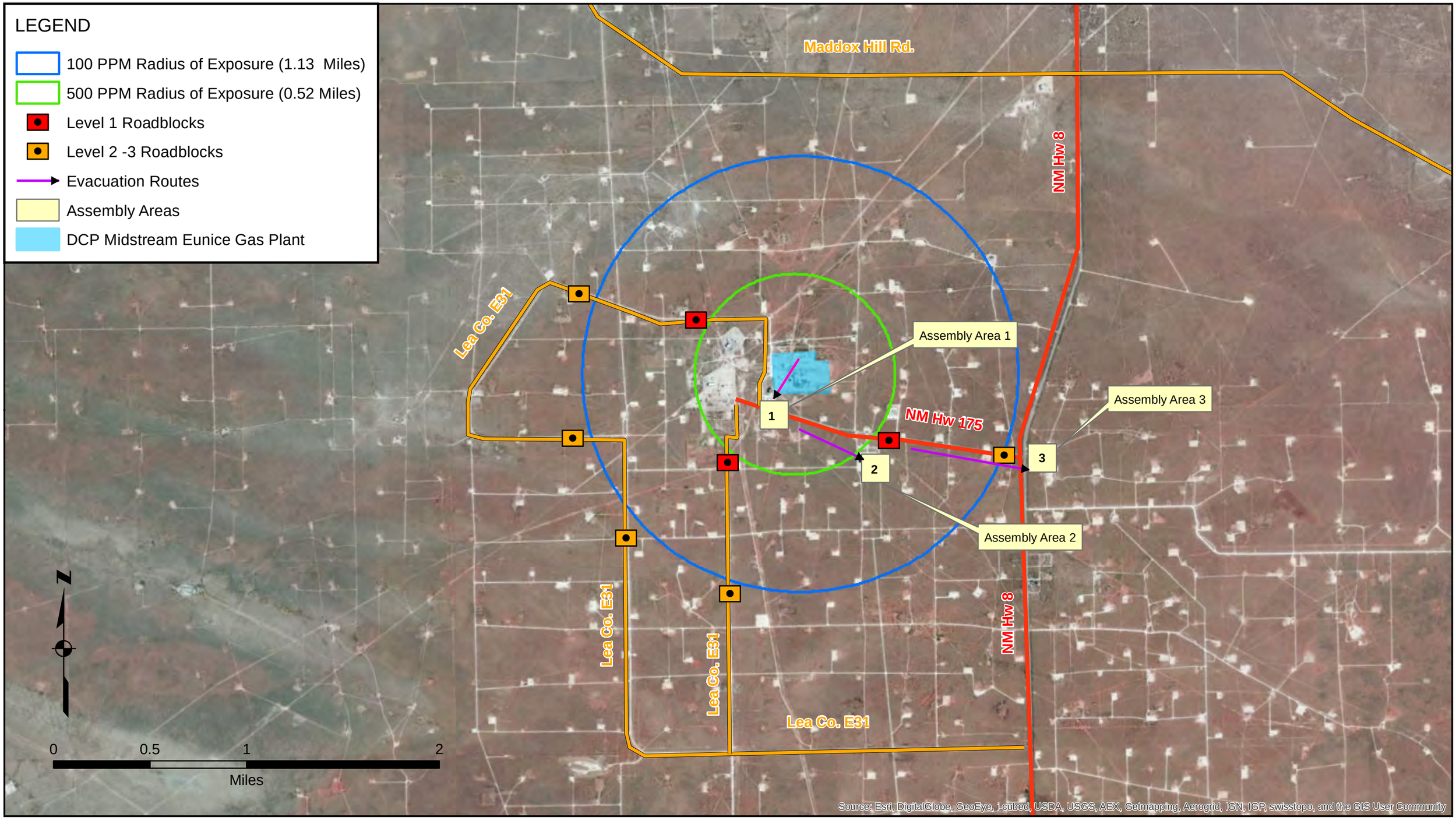

Figure 3: 500 and 100 PPM H2S ROE Map, Roadblock and Emergency Assembly Locations, and Evacuation Routes

Explanation

- 100 PPM Radius of Exposure (1.13 Miles)
- 500 PPM Radius of Exposure (0.52 Miles)
- Level 1 Roadblocks
- Level 2 -3 Roadblocks
- Evacuation Routes
- Assembly Areas
- DCP Midstream Eunice Gas Plant

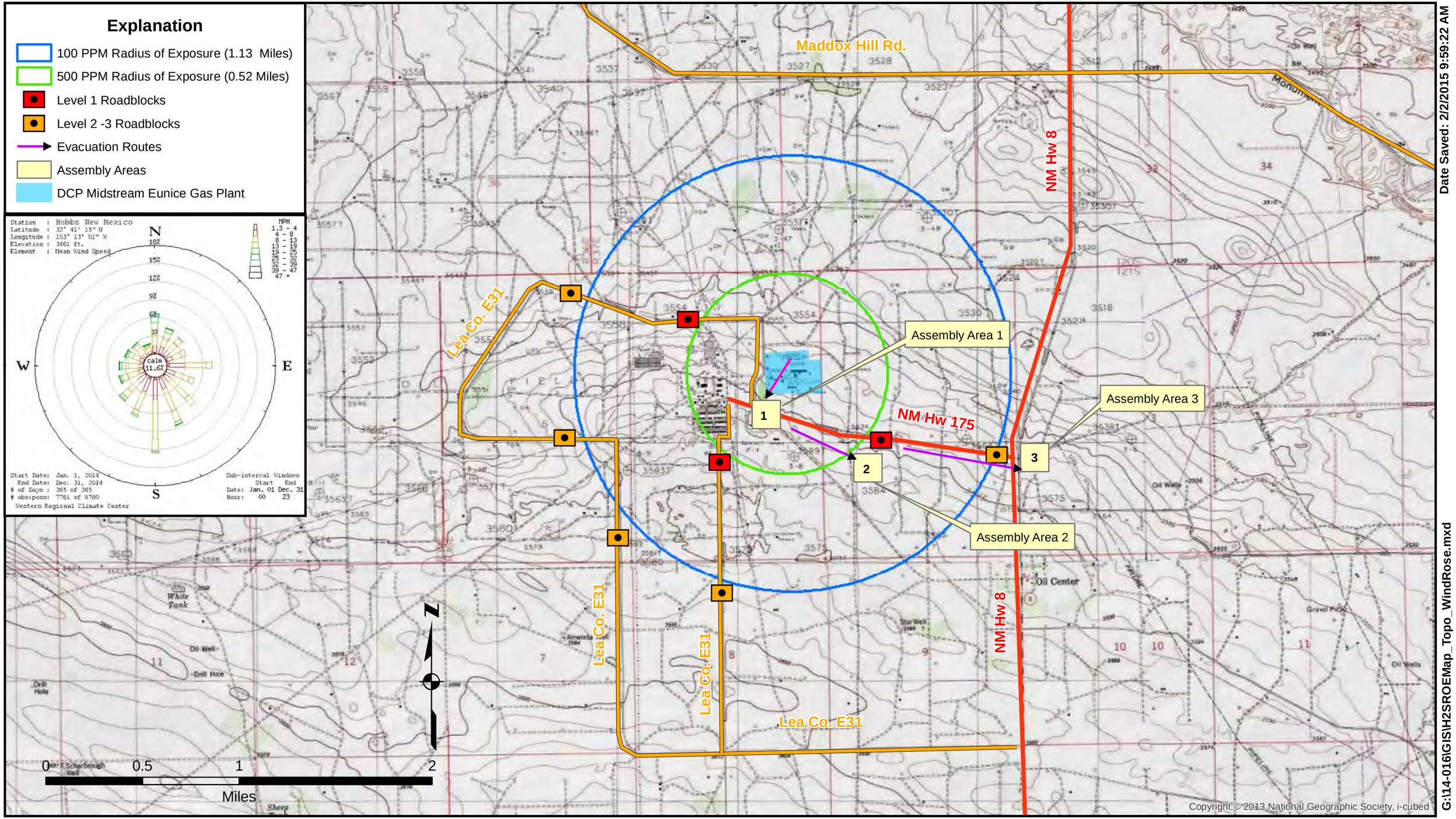

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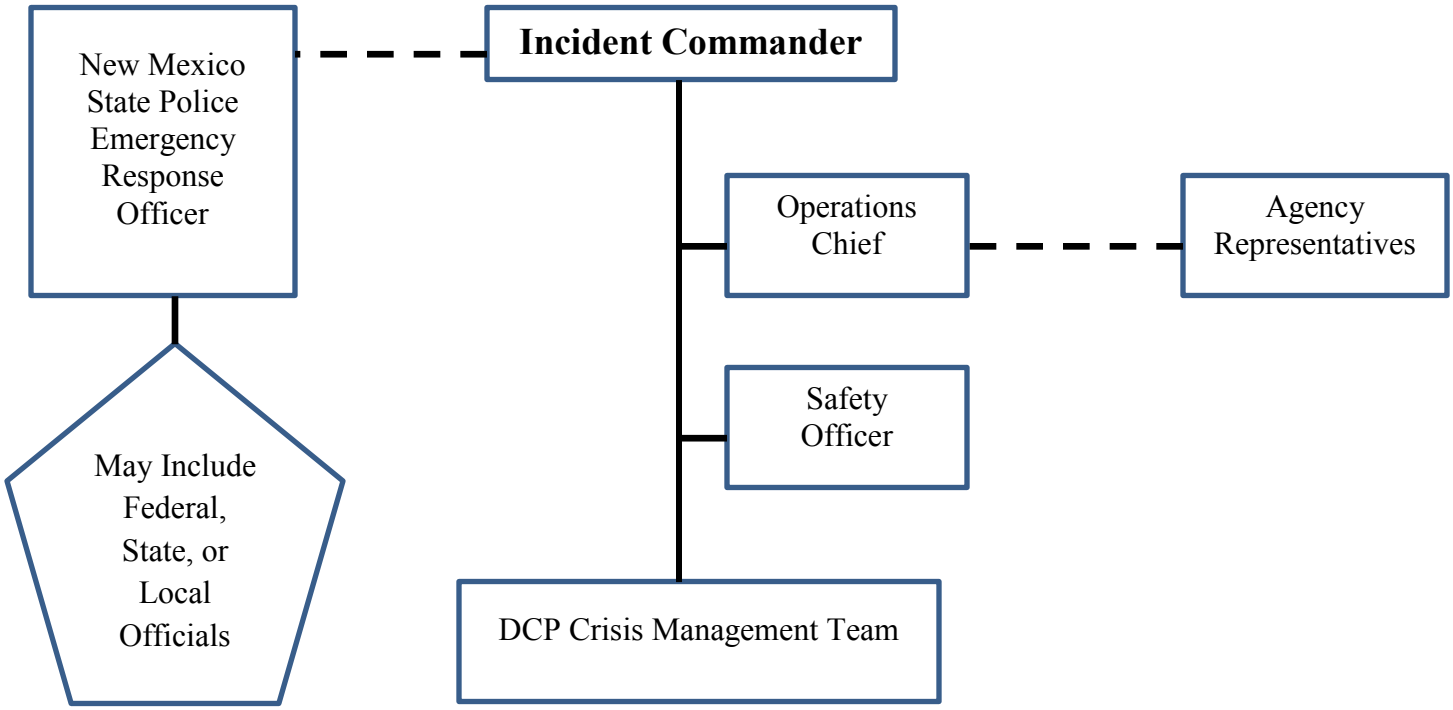
Figure 3a: DCP Midstream Eunice Plant
Topographical Base Map Including 500 and 100 PPM H2S ROE and 2014 Wind Direction Rose Diagram

GEOLEX® INCORPORATED

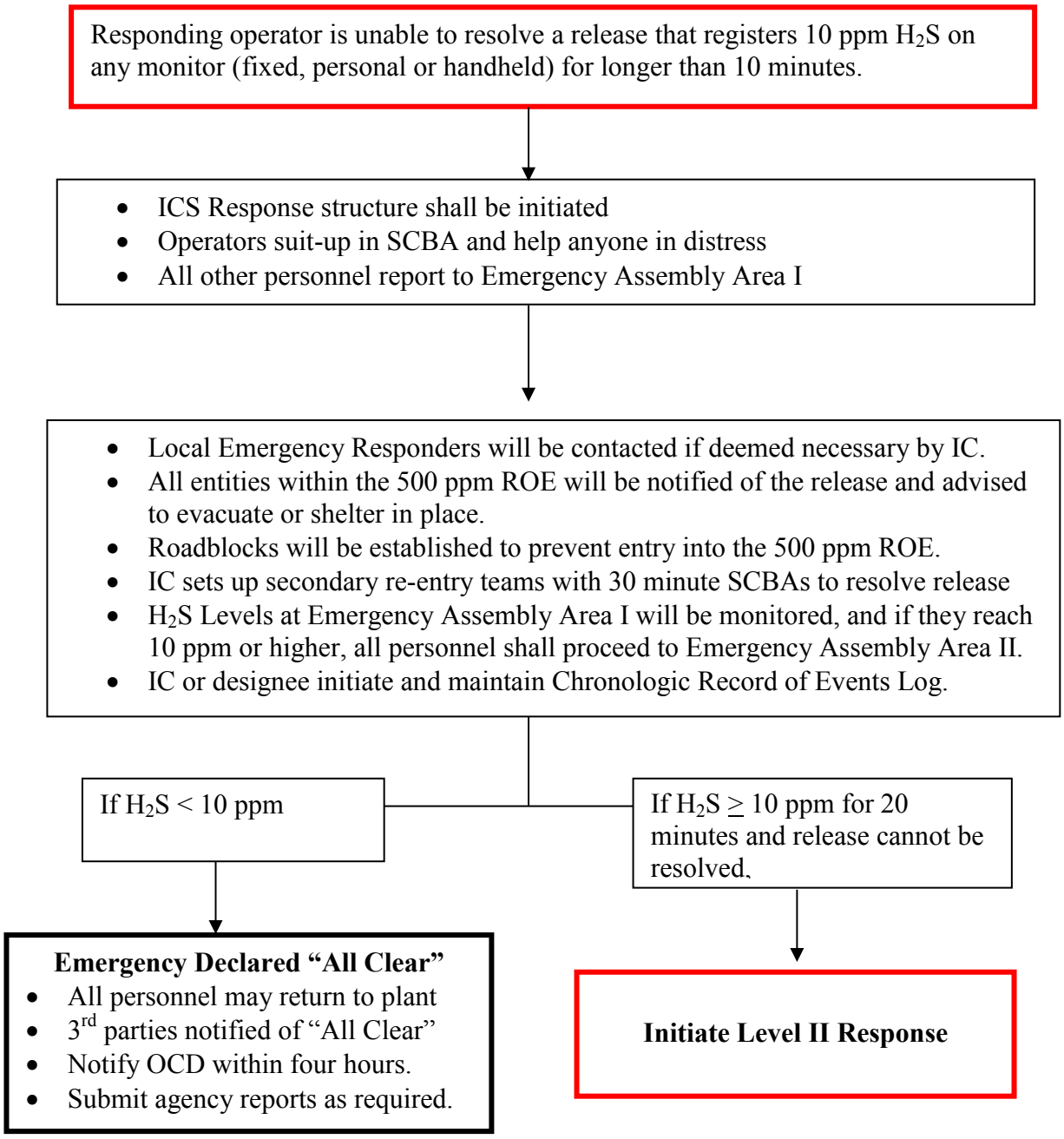
FIGURE 4

INCIDENT COMMAND SYSTEM STRUCTURE



APPENDIX A
RESPONSE FLOW DIAGRAMS

LEVEL I RESPONSE



LEVEL II RESPONSE

Level I response unsuccessful and H_2S > 10 ppm for 20 minutes or if any fixed monitor alarms at 90 ppm.

- Operators suit-up in SCBA and help anyone in distress.
- All personnel evacuate to Emergency Assembly Area 2. Personnel accounted for using plant sign-in sheet.

- ICC established at Emergency Assembly Area 2.
- H_2S Levels at Assembly Area 2 monitored with hand-held or personal monitors and if they reach 20 ppm or greater, all personnel evacuate to Assembly Area 3. ICC re-established at Assembly Area 3. All personnel accounted for using Plant sign-in sheet.
- ESD activated immediately if any monitors register 90 ppm H_2S.
- Local emergency responders contacted as deemed necessary by IC.
- All entities within 100 ppm ROE will be advised to evacuate or shelter-in-place at discretion of IC.
- LEPC and law enforcement notified.
- Roadblocks set up to prevent access to 100 ppm ROE
- Operators with 30 minute SCBAs continue to attempt to resolve release. Operators contact IC after 20 minutes to determine if plant ESD should be activated.
- Operators re-enter in full SCBA in 15 minute shifts to attempt to resolve release.
- IC or designee initiate and maintain Chronologic Record of Events Log

If H_2S < 10 ppm

Emergency Declared "All Clear"

- All personnel return to work
- 3rd parties notified of All Clear"
- Notify OCD within 4 hours.
- Submit agency reports as required.

If release cannot be resolved, and H_2S levels continue to rise or are $\geq$ 10 ppm for 60 minutes.

Initiate Level III Response

LEVEL III RESPONSE

- Corrective action at Level II is unsuccessful and H2S > 10 ppm for 60 minutes.
- Catastrophic release, fire, explosion or continuous release of maximum volume.
- Per NMA 19.15.11, any indication of 100 ppm at any defined public area, 500 ppm at any public road or 100 ppm at a distance greater than 3000 feet from site of release.

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- ESD of Plant initiated immediately.
- Evacuation alarm sounded and all personnel evacuate to Emergency Assembly Area 3. All personnel accounted for using Plant sign-in sheet.
- Operators don SCBAs and help any persons in distress
- Roadblocks established to prevent entry into 100 ppm ROE.
- ICC established at Emergency Assembly Area 3.
- IC confirms notification of all entities in 500 and 100 ppm ROE and reviews status of evacuation to make final decision whether all individuals should evacuate or shelter in place.
- IC confirms that all emergency responders, LEPC and law enforcement have been notified
- Within one hour of activation of Level III Response, DCP will notify New Mexico OCD and National Response Center.
- DCP will establish medial staging area adjacent to Assembly Area 3 and direct all media to it.
- IC or designee establish and maintain Chronologic Record of Events Log.

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If H_2S < 10 ppm

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Emergency Declared "All Clear"

- Once repairs are made and monitoring results are negative, personnel may return to work.
- 3rd parties notified of "All Clear"
- Roadblocks removed.
- Submit agency reports submitted as required.

APPENDIX B
TELEPHONE NUMBERS
EMERGENCY CALL LIST

BUSINESSES AND and INDIVIDUALS IN PUBLIC AREAS WITHIN THE ROE

There are no individual residences within the 100 or 500 ppm ROE. The only businesses in the ROE are an equipment storage yard and a small bulk plant that belong to XTO Energy, who is also a producer within the ROE. Their contact information is provided below.

PRODUCERS WITH WELLS WITHIN THE ROE

PRODUCER	OFFICE LOCATION	CONTACT NAME	Phone
Apache Corp	303 Veterans Airpark Lane, Suite 3000 Midland, TX 79705	Reasa Holland	432-818-1062
Cimarex Energy Company of Colorado	PO Box J40907 Irving, TX 75014	Zeno Farris	972-443-6489
Conoco Philips Company	4001 Penbrook Street Odessa, TX 79762	Yolanda Perez	832-486-2329
Diamond S Energy Company	PO Box 2260 Weatherford, TX 76086	H. Brad Reynolds	817-841-7033 x102
Enervest Operating, LLC	1001 Fannin Street, Ste 800 Houston, TX 77002	Ronnie L. Young	713-495-6530
Saber Oil and Gas Ventures, LLC	400 W Illinois, Suite 950 Midland, TX 79701	Nelson Patton	432-685-0169
XTO Energy, Inc	200 N. Loraine, Suite 800 Midland, TX 79701	Luis Cabello	573-631-0306

DCP COMPANY INTERNAL NOTIFICATIONS

NAME	TITIE	OFFICE	CELL
Control Room	Eunice Plant Operators	575-394-5009	
	Eunice Plant Operator III	575-394-5006	
Royal Hopper	Eunice Plant Supervisor	575-394-5003	575-802-5110
John Cook	SENM South Asset Director	575-234-6441	432-631-9524
Steve Harless	SENM General Manager	575-397-5505	907-369-0333
Tom Thomlinson	SENM Asset Safety Coordinator	575-391-5752	575-631-5532
Bill Johnson	VP Operations Permian Region	303-605-1751	720-219-7846
Greg Smith	President Permian Business Unit	303-605-1703	720-480-4941
Glenn Bowhay	Safety Manager Permian Region	432-620-4009	432-425-7635
	DCP Gas Control, Houston, TX	800-435-1679	N/A
Al Alexander	PSM Coordinator	575-391-5721	575-491-6004

EMERGENCY RESPONDERS

AGENCY	PHONE
Emergency Dispatch	911
Eunice Fire Department	575-394-3258
Hobbs Fire Department	575- 397-9308
Eunice Police Department	575-394-2111
Hobbs Police Department	575-397-9265
Ambulance Service (Hobbs)	575-397-9308
New Mexico State Police (Eunice)	575-748-9718
New Mexico State Police (Hobbs)	575-392-5588
Lea County Sheriff's Office	575-396-3611
Lea Regional Medical Center (Hobbs)	575- 492-5000
Lubbock University Medical Center (UMC) (Level 1 Trauma Center)	806-345-9911
New Mexico Poison Control (Albuquerque)	800-222-1222
HELICOPTER SERVICES AeroCare (Lubbock) Air Med (El Paso)	 800-823-1991 800-527-2767

COUNTY AND LOCAL LAW ENFORCEMENT/STATE AND FEDERAL PUBLIC AGENCIES

AGENCY	PHONE NUMBER
Oil Conservation Division Santa Fe Office District 1 Office, Lea County (Hobbs)	 505-476-3440 575- 370-3186
Local Emergency Planning Committee (LEPC) Lea County	 575-396-8607
State Emergency Response Commission	505-476-9600
New Mexico Department of Homeland Security & Emergency Management	505-476-9600
New Mexico Emergency Response Commission in NMDHSEM	505-476-9640
National Response Center (NRC)	800-424-8802

APPENDIX C

RADIUS OF EXPOSURE (ROE) CALCULATIONS

DCP EUNICE GAS PLAN
500 and 100 ppm ROE Calculation

ROE CALCULATIONS PURSUANT TO RULE 11

If data is provided in mole% use calculator below for getting ppm

Enter Mole % in cell C5	Mole %	ppm
Convert mole% to ppm	0.65	6500

If data is provided in mole fraction use calculator below for getting ppm

Enter Mole Fraction in cell C10	Mole Fraction	ppm
Convert mole fraction to ppm	0	0

Use ppm derived from either of above calculations to input data below

Input Data Here	H_2S Concentration (ppm)	6500
	24 Hour Throughput (MMSCFD)	105

The radius of exposure is calculated using the following equations:

100 ppm ROE calculation (as per 19 NMAC 15.11.7.K.1)

$$X_{100ppm} = [(1.589)(Conc_{H2S})(Q)]^{(0.6258)}$$

500 ppm ROE calculation (as per 19 NMAC 15.11.7.K.2)

$$X_{500ppm} = [(0.4546)(Conc_{H2S})(Q)]^{(0.6258)}$$

Where:

X = radius of exposure (ft)

$Conc_{H2S}$ = the decimal equivalent of the mole or volume fraction of H_2S in the gas

Q = daily plant throughput corrected to standard conditions (SCFD)

Plant parameters

Q =	105	MMSCFD =	105000000	SCFD	
$Conc_{H2S}$ =	6500	ppm =	0.65	Mole %=	0.0065 Mole Fraction

ROE calculation:

X_{100ppm} = [(1.589)*(0.0065)*(105000000)]^(0.6258)

X_{100ppm} = 5982 ft = 1.13 miles

X_{500ppm} = [(0.4546)*(0.0065)*(105000000)]^(0.6258)

X_{500ppm} = 2734 ft = 0.52 miles

APPENDIX D
H_2S PLAN DISTRIBUTION LIST

New Mexico Oil Conservation Division, Santa Fe Office

New Mexico Oil Conservation Division, Hobbs District Office

New Mexico Environment Department

New Mexico Department of Public Safety (Hobbs Office)

New Mexico Department of Public Safety (State Office)

Eunice Fire Department

Hobbs Fire Department

Lea County Sheriff Department

Lea County LEPC

Eunice Police

Hobbs Police

DCP Eunice Plant Office

New Mexico State Police, Hobbs Office

State Emergency Response Commission

APPENDIX E

CHRONOLOGIC RECORD OF EVENTS LOG

CHRONOLOGIC RECORD OF EVENTS LOG

1. Incident Name	2. Operational Period (Date/Time) From: To:	UNIT /ACTIVITY LOG ICS 214

3. Individual Name	4. ICS Section	5. Assignment/Location

6. Activity Log	Page	of

TIME	MAJOR EVENTS

7. Prepared by:	Date/Time

UNIT/ACTIVITY LOG		ICS 214

APPENDIX F

NEW MEXICO OIL CONSERVATION DIVISION

FORM C-141

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☐ Final Report

Name of Company	Contact
Address	Telephone No.
Facility Name	Facility Type

Surface Owner	Mineral Owner	API No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County

Latitude_____ **Longitude**_____

NATURE OF RELEASE

Type of Release	Volume of Release	Volume Recovered
Source of Release	Date and Hour of Occurrence	Date and Hour of Discovery
Was Immediate Notice Given? ☐ Yes ☐ No ☐ Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? ☐ Yes ☐ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully *

Describe Cause of Problem and Remedial Action Taken *

Describe Area Affected and Cleanup Action Taken *

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD 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 NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD 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.

Signature:	OIL CONSERVATION DIVISION	
Printed Name:	Approved by Environmental Specialist:	
Title:	Approval Date:	Expiration Date:
E-mail Address:	Conditions of Approval:	Attached ☐
Date: Phone:		

* Attach Additional Sheets If Necessary