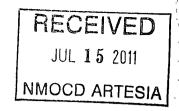
30-015-39240

RKI Exploration & Production

Hydrogen Sulfide Contingency Plan For Drilling/Workover/Facility



This well and its anticipated facility are not expected to have Hydrogen Sulfide releases. However, there may be Hydrogen Sulfide production in the nearby area. There are no private Residences in the area but a contingency plan has been orchestrated. RKI Exploration and Production will have a Company Representative available to rig personnel through out drilling or production operations. If hydrogen sulfide is detected or suspected, monitoring equipment will be acquired for monitoring and/or testing.

Hydrogen Sulfide Contingency Plan For Drilling/Workover/Facility

TABLE OF CONTENTS

COVER PAGE AND REASONING	Page 1
GENERAL EMERGENCY PLAN	Page 3
EMERGENCY PROCEDURE FOR UNCONTROLLED RELEASES OF H2S	Page 3-4
EMERGENCY NUMBERS	Page 4-5
PRODUCTION OF THE GENERAL RADIUS OF EXPOSURE RADIUS OF EXPOSURE (ROE)	Page 6
PUBLIC EVACUATION PLAN	Page 6-7
PROCEDURE FOR IGNITING AN UNCONTROLLABLE:	
PROCEDURE FOR IGNITION	Page 7
REQUIRED EMERGENCY EQUIPMENT	Page 8
USING SELF CONTAINED BREATHING AIR EQUIPMENT (SCBA)	Page 9
RESCUE & FIRST AID FOR VICTIMS OF HYDROGEN SULFIDE (H2S) POISONING	Page 9-10
H2S TOXIC EFFECTS	Page 11
H2S PHYSICAL EFFECTS	Page 11

Hydrogen Sulfide Contingency Plan For Drilling/Workover/Facility

General H2S Emergency Actions:

- 1. All personnel will immediately evacuate to an up-wind and if possible up-hill "safe area".
- 2. If for any reason a person must enter the hazardous area, they must wear a SCBA (Self Contained Breathing Apparatus).
- 3. Always use the "buddy system"
- 4. Isolate the well/problem if possible
- 5. Account for all personnel
- 6. Display the proper colors warning all unsuspecting personnel of the danger at hand.
- 7. Contact the Company personnel as soon as possible if not at the location (use the enclosed call list as instructed)

At this point the company representative will evaluate the situation and coordinate the necessary duties to bring the situation under control, and if necessary, the notification of the emergency response agencies and nearby residents.

EMERGENCY PROCEDURES FOR AN UNCONTROLLABLE RELEASE OF H2S

- 1. All personnel will don the self contained breathing apparatus
- 2. Remove all personnel to the "safe area" (always use the buddy system)
- 3. Contact company personnel if not on location]
- 4. Set in motion the steps to protect and or remove the general public to and upwind "safe area" Maintain strict security & safety procedures while dealing with the source.
- 5. No entry to any unauthorized personnel
- 6. Notify the appropriate agencies: City Police City Street(s)

State Police - State Rd. County Sheriff - County Rd.

7. Call the NMOCD

Hydrogen Sulfide Contingency Plan For Drilling/Workover/Facility

If at this time the supervising person determines the release of H2S cannot be contained to the site location and the general public is in harms way he will take the necessary steps to protect the workers and the public.

EMERGENCY CALL LIST: (Start and continue until ONE of these people has been contacted)

	OFFICE	MOBILE	HOME
RKI E&P	1-800-667-6958		
Gene Simer	575-885-1313	575-706-3225	575,-885-6302
Tim Haddican	405-949-2329	405-823-2872	405-348-5515
EMERGENCY RESPO	NSE NUMBERS:		
State Police State Police	Eddy County Lea County		575 -748-9718 575-392-5588
Sheriff Sheriff	Eddy County Lea County		575-746-2701
Emergency Medical Service (Ambulance)	Eddy County Lea County	Eunice	911 or 505-746-2701 911 or 505-394-3258
Emergency Response	Eddy County SERC Lea County		575 476- 9 6 20
Artesia Police Dept Artesia Fire Dept			575746-5001 575 746-500 1
Carlsbad Police Dept Carlsbad Fire Dept			575-885-2111 575885-3125

EMERGENCY CALL LIST (CONT.)

Loco Hills Police Dept		575- 677-2349
Jal Police Dept Jal Fire Dept Jal Ambulance		575395-2501 575395-2221 575395-2221
Eunice Police Dept Eunice Fire Dept Eunice Ambulance		575- 394-0112 575- 394-3258 575- 394-3258
Hobbs Police Dept Hobbs Fire Dept		575397-3365 57539 7- 930 8
NMOCD	District 1 (Lea, Roosevelt, Curry) District 2 (Eddy, Chavez)	575393-6161 575 748-1283
Lea County Information		575393-8203
Callaway Safety	Eddy/Lea Counties	575392-2973
BJ Services	Artesia Hobbs	575746-3140 575392-5556
Halliburton	Artesia Hobbs	1-800-523-2482 1-800-523-2482
Wild Well Control	Midland Mobile	432-550-6202 432-553-1166

Hydrogen Sulfide Contingency Plan For Drilling/Workover/Facility

PROTECTION OF THE GENERAL PUBLIC (ROE)

- 100 ppm at any public area (any place not associated with this site)
- 500 ppm at any public road (any road with the general public may travel)
- 100 ppm radius of ¼ mile in New Mexico will be assumed if there is insufficient data to do the calculations, and there is a reasonable expectation that H2S could be present in concentrations greater than 100 ppm in the gas mixture

CALCULATIONS FOR THE 100 PPM (ROE) "PASOUILL-GIFFORD EQUATION"

X = [(1.589) (mole fraction) (Q-volume in std cu ft)] to the power of (0.6258)

CALCULATION FOR THE 500 PPM ROE:

 $X = \{(.4546) \text{ (mole fraction) } (Q - \text{volume in std cu ft)} \}$ to the power of (0.6258)

Example:

If a well/facility has been determined to have 150 / 500 ppm H2S in the gas mixture and the well/facility is producing at a gas rate of 100 MCFPD then:

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150 ppm X = [(1.589) (.00015) (100,000 \text{ cfd})] to the power of (.6258)
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500 ppm X = [(.4546) (.0005) (100,000 cfd)] to the power of (.6258) X = 3.3 ft.

(These calculations will be forwarded to the appropriate District NMOCD office when Applicable)

PUBLIC EVACUATION PLAN:

- Notification of the emergency response agencies of the hazardous condition and implement evacuation procedures.
- A trained person in H2S safety shall monitor with detection equipment the H2S concentration, wind and area exposure (ROE). This person will determine the outer perimeter of the hazardous area. The extent of the evacuation area will be determined from the data being collected. Monitoring shall continue until the situation has been resolved. (All monitoring equipment shall be UL approved, for use in class 1 groups A, B, C & D, Division 1, hazardous locations. All monitor will have a minimum capability of measuring H2S, oxygen and flammable values.)

Hydrogen Sulfide Contingency Plan For Drilling/Workover/Facility

- Law enforcement shall be notified to set up necessary barriers and maintain such for the duration of the situation as well as aid in the evacuation procedure.
- The company supervising personnel shall stay in communication with all agencies through out the duration of the situation and inform such agencies when the situation has been contained and the effected area(s) is safe to enter.

PROCEDURE FOR IGNITING AN UNCONTROLABLE CONDITION:

- 1. Human life and/or property are in danger.
- 2. There is no hope of bringing the situation under control with the prevailing conditions at the site.

INSTRUCTION FOR IGNITION:

- 1. Two people are required. They must be equipped with positive pressure, self contained breathing apparatus and a "D" ring style full body, OSHA approved safety harness. Non flammable rope will be attached.
- 2. One of the people will be qualified safety person who will test the atmosphere for H2S, oxygen and LFL. The other person will be the company supervisor; he is responsible for igniting the well.
- 3. Ignite up wind from a distance no closer than necessary. Make sure that where you ignite from has the maximum escape avenue available. A 25 mm flare gun shall be used, with a ± 500 ft. range to ignite the gas.
- 4. Prior to ignition, make a final check with combustible gases.
- 5. Following ignition, continue with the emergency actions & procedures as before.

Hydrogen Sulfide Contingency Plan For Drilling/Workover/Facility

REQUIRED EMERGENCY EQUIPMENT:

1. Breathing apparatus:

- Rescue packs (SCBA) 1 unit shall be placed at each breathing area, 2 shall be stored in the safety trailer.
- Work/Escape packs 4 packs shall be stored on the rig floor with sufficient air hose not to restrict work activity
- Emergency Escape Packs 4 packs shall be stored in the doghouse for emergency evacuation.

2. Signage & Flagging:

- One color code condition sign will be placed at the entrance to the site reflection the
 possible conditions at the site.
- A colored conditioned flag will be on display, reflecting the condition at the site at the time.

3. Briefing Area:

Two perpendicular areas will be designated by signs and readily accessible.

4. Wind Socks:

Two windsocks will be placed in strategic locations, visible from all angles.

5. H2S Detectors & Alarms:

- The stationary detector with three sensors will be placed in the upper dog house if equipped, set to visually alarm @ 10 ppm and audible at 14 ppm. Calibrate a minimum of every 30 days or as needed. The sensors will be placed in the following places: (Gas sample tubes will be stored in the safety trailer)
 - Rig Floor
 - Bell Nipple
 - End of flow line or where well bore fluid are being discharged.

6. Auxiliary Rescue Equipment:

- Stretcher
- Two OSHA full body harness
- 100 ft. 5/8 inch OSHA approved rope.
- 1 20# class ABC fire extinguisher
- Communication via cell phones on location and vehicles on location.

Hydrogen Sulfide Contingency Plan For Drilling/Workover/Facility

USING SELF CONTAINED BREATHING AIR EQUIPMENT (SCBA):

- (SCBA) SHOULD BE WORN WHEN ANY OF THE FOLLOWING ARE PERFORMED:
 - Working near the top or on the top of a tank
 - Disconnecting any line where H2S can reasonably be expected
 - Sampling air in the area to determine if toxic concentration of H2S can exist.
 - Working in areas where over 10 ppm on H2S has been detected.
 - At any time there is a doubt as the level of H2S in the area.
- All personnel shall be trained in the use of SCBA prior to working in a potentially hazardous location.
- Facial hair and standard eyeglasses are not allowed with SCBA.
- Contact lenses are never allowed with SCBA.
- Air quality shall be continuously checked during the entire operation.
- After each use, the SCBA unit shall be cleaned, disinfected, serviced and inspected.
- All SCBA shall be inspected monthly.

RESCUE AND FIRST AID FOR VICTIMS OF HYDROGEN SULFIDE (H2S) POISONING:

- Do not panic
- Remain calm and think
- Get on the breathing apparatus

Hydrogen Sulfide Contingency Plan For Drilling/Workover/Facility

- Remove the victim to the safe breathing area as quickly as possible. Up wind and uphill from source or cross wind to achieve upwind.
- Notify emergency response personnel.
- Provide artificial respiration and or CPR, as necessary.
- Remove all contaminated clothing to avoid further exposure.
- A minimum of two personnel on location shall be trained in CPR and First Aid.

Hydrogen Sulfide Contingency Plan For Drilling/Workover/Facility

H2S is extremely toxic. The acceptable ceiling for eight hours of exposure is 10 ppm, which is .001% by volume. H2S is approximately 20% heavier than air (Sp. Gr = 1.19) (Air = 1) and colorless. It forms an explosive mixture with air between 4.3% and 46%. By volume hydrogen sulfide is almost as toxic as hydrogen cyanide and is 5-6 times more toxic than carbon monoxide.

COMMON NAME	CHEMICAL ABBREV.	SPECIFIC GRVTY.	THRESHOLD LIMITS	HAZARDOUS LIMITS	LETHAL CONCENTRATIONS
Hydrogen Sulfide	H2S	1.19	10 ppm 15 ppm	100 ppm/hr	600ppm
Hydrogen Cyanide	HCN	0.94	10 ppm	150 ppm/hr	300 ppm
Sulfur Dioxide	SO2	2,21	2 ppm	N/A	1000 ppm
Chlorine	Cl.2	2.45	1 ppm	4 ppm/hr	1000 ppm
Carbon Monoxide	СО	0.97	50 ppm	400 ppm/hr	1000 ppm
Carbon Dioxide	CO2	1.52	5000 ppm	5%	10%
Methane	CH4	0.55	90,000	Combustible @ 5%	N/A

Threshold Limit: Concentrations at which it is believed that all workers may be repeatedly

exposed, day after day without adverse effects.

Hazardous Limit: Concentrations that may cause death.

Concentrations: Concentrations that will cause death with short term exposure.

Threshold Limit: NIOSH guide to chemical hazards

(10 ppm)

PHYSICAL EFFECTS OF HYDROGEN SULFIDE:

CONCE	NTRATION	PHYSICAL EFFECTS
.001%	10 ppm	Obvious and unpleasant odor. Sale for 8 hr. exposure
.005%	50 ppm	Can cause some flu like symptoms and can cause pneumonia.
.01%	100 ppm	Kills the sense of smell in 3-15 minutes. May irritate the eyes and throat.
.02%	200 ppm	Kills the sense of smell rapidly. Severely irritates the eyes and throat. Severe flu-like symptoms after 4 or more hours. May cause lung damage and or death.
.06%	600 ppm	Loss of consciousness quickly, death will result if not rescued promptly.