MIDSTREAM OPERATIONS PLAN
PURSUANT TO NMAC 19.15.28

PRONTO GAS GATHERING SYSTEM
Facility # fAPP2304039201
PRONTO MIDSTREAM, LLC
OGRID #331527

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Submitted To:

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October 2022

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PRONTO MIDSTREAM, LLC
NEW MEXICO OPERATIONS
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1.0 SYSTEM OVERVIEW

NMOCD Guidelines
General purpose overview of the gathering system (i.e. service area and intent of the lines, etc.)
High or low pressure
PHMSA/NMPRC Regulated/Non-Regulated lines
Sweet or Sour Natural Gas
Above ground or buried lines
Installation date of lines (By Decade)
Construction material

Pronto Midstream, LLC ('Pronto') provides natural gas gathering and compression services through approximately 45 miles of natural gas gathering pipelines in Eddy and Lea Counties, New Mexico, including two large-diameter natural gas gathering lines (one in northeast Eddy County, New Mexico and the other extending from northeast Eddy County into western Lea County, New Mexico). The gas is sweet and the gathering lines vary in operating pressure. The pipelines are of steel construction, generally buried and have all been constructed in the last ten years (decades 2010-2019 and 2020-2029). Those portions of the gathering system subject to the requirements of 49 CFR 192 Transportation of Natural and other Gas by Pipeline are designed and operated accordingly. A full description of the gathering system is available through Pronto's GIS information submitted in accordance with 19.15.28.9 NMAC. The Location provided in the NGGS Application (32.53686576,-103.828306 NAD83) is for the pig receivers immediately north of the Marlan Gas Processing Plant. The receivers are at the convergence of the western and eastern portions of the Pronto Gas Gathering System.

2.0 ROUTINE OPERATIONS AND MAINTENANCE

NMOCD Guidelines
- Physical pipeline marking and identification
- Right of Way patrols, Leak surveys
- Pipeline Integrity (non-exclusive list)
  - Routine pipeline inspections
- Pipeline Pigging
  - Schedule
  - Pigging types and applications
- Pipeline maintenance program (non-exclusive list)
  - Depressurization procedures
  - Cathodic protection/anode installation
  - Pressure test and dewatering
- Pressure test guidelines and schedule

2.1 Physical Pipeline Marking and Identification

As described in Pronto's GIS information submitted in accordance with 19.15.28.9 NMAC, the majority of the pipelines are located below ground. Pronto has periodic pipeline markings at roadway crossings and along the pipeline length.

2.2 Right of Way (ROW) Patrols and Leak Surveys

Pronto's gas operations are locally operated but are monitored continuously by a remote monitoring center. The remote monitoring center is in constant communication with Pronto field personnel and can monitor volumes and pressures at specified locations within the system and receive alarms to quickly identify potential issues and dispatch field personnel to confirm and/or make necessary repairs as soon as practicable.

2.2.1 Pipeline Patrolling

Pipelines are periodically patrolled to observe surface conditions on and adjacent to the ROW.

2.2.1.1 Responsibility

Pronto's operations group ("Operations") is responsible for scheduling employees or contractors to perform the inspections and overall administration of the land and/or aerial patrol schedule, including follow-up and corrective action initiation.

2.2.1.2 **Requirements**

A. Frequency of Patrolling - The frequency of patrols is based on regulatory requirements. Any DOT-regulated lines have ROW inspected at least twice per year and leak detection performed at least once per year. Non-regulated pipelines are inspected as needed or if an issue is suspected, but at least annually in accordance with 19.15.28.8 (C) (5) NMAC. Any compressor stations associated with the gathering system that fall within the requirements of 19.15.28 NMAC will have audio, visual, and olfactory (AVO) inspections performed weekly in accordance with 19.15.28 NMAC.

B. Patrolling Requirements

1. All pipeline ROW(s) are patrolled by walking, vehicle, aerial or a combination of these as needed.
2. The patrol is to observe conditions of exposed pipe and surface conditions on and adjacent to the pipeline ROW, and to look for indications of leaks (boils, slicks, cave-ins and vegetation damage) construction activities, and any other factors which might affect the safety and operation of the pipeline.

2.3 Pipeline Pigging

Pronto performs periodic pigging of lines depending on composition, topography, operating pressure, daily volumes and other factors. General industry practice is followed to ensure the integrity of the pipeline. Generally, the gathering lines between the production tank batteries and gas gathering / compressor stations are pigged on an “as-needed” basis. Gathering lines between the compressor stations and processing plant are pigged anywhere from daily to bi-weekly depending on gas composition and other conditions.

Pronto typically runs 3-cup pigs for most lines. Other pig types may be utilized for various situations and needs. Pigging needs vary depending on the composition of the natural gas feeding into the gathering system. Pigs may begin at production tank batteries, compressor stations or at other pig launching locations throughout the system.

2.4 Pipeline Maintenance Program

Pronto monitors the gas gathering pipeline to determine when maintenance may be needed.

2.4.1 Pipeline Depressurization Program

2.4.1.1 Responsibility

- Pronto's senior operations and engineering personnel are responsible for all surveys, inspections and documentation as required within this section.

2.4.1.2 Requirements

- When a pipeline segment needs to be depressurized, the segment is isolated at the nearest block valves upstream and downstream to minimize the amount of gas that needs to be removed.
- During scheduled maintenance, gas will be routed to a portable flare stack.
- During unscheduled maintenance or an emergency, gas is routed to a portable or permanent flare stack if technically feasible, otherwise, gas may be vented to a safe location.
- During depressurization, a Pronto representative is present to monitor the process, control access to the location, watch for unsafe conditions, halt the depressurization if an unsafe condition arises, and call for additional assistance or emergency help if needed.

2.4.2 Pipeline Pressure Test Program

2.4.2.1 Responsibility

- Pronto's senior construction, operations and engineering personnel are responsible for all surveys, inspections and documentation as required within this section.

2.4.2.1 Requirements

- Pipelines are pressure tested according to general industry standards when being initially brought online. Pronto monitors the pressurization carefully to ensure safe return to service. Pronto runs a pig to dewater the line if it is determined necessary.

- Any regulated lines are tested to substantiate maximum allowable operating pressure (MAOP) according to the requirements of 49 CFR 192 Subpart J prior to being put into service. For those lines, the pressure test lasts at least 8 hours at or above the required test pressure. Fabricated units and short sections of pipe for which a post installation test is impractical are pre-installation tested for 4 hours at or above the required test pressure. The tie-in welds are then non-destructive tested.

- Non-regulated lines are tested to substantiate MAOP prior to being put into service. For those lines, the pressure test procedure and duration are based on the general industry standards and guidance of the design engineer.

3.0 CATHODIC PROTECTION, CORROSION CONTROL AND LIQUIDS MANAGEMENT

NMOCD Guidelines
- Cathodic protection
  - Installation on new pipelines
  - Installation or retrofit on existing pipelines
  - Monitoring and testing program to ensure effective cathodic protection
- Chemical treatments
- Fluid management – centralized vs. field dehydration
- Tank Operations and Maintenance associated with the gathering system. How are the tanks managed to reduce venting and overflow events (i.e. tanks related to pigging, dehydration, etc.)

3.1 Cathodic Protection

Any DOT-regulated lines are protected by cathodic protection no later than one year after being placed into service. Pronto's cathodic protection program has been created and implemented with coordination of a competent cathodic protection consulting firm. Additional non-regulated lines may also have cathodic protection as deemed necessary from consultation with an outside competent cathodic protection consultant. Pronto's pipeline system has all been constructed within the last 10 years and all new pipelines are evaluated for cathodic protection during construction.

3.1.1 Responsibility

Pronto generally utilizes a third-party contractor for all cathodic protection of both regulated and non-regulated lines. Operations provides management oversight of all third-party contractors.

3.1.2 Requirements

- For DOT-regulated lines, cathodic testing is conducted at intervals not exceeding 15 months, but at least once each calendar year. Additionally, on short sections of the pipeline (less than 100 ft) pipe to soil surveys are conducted so that 10% of the pipeline system is inspected each year and all affected sections will be inspected within 10 yrs.
- For regulated lines, each cathodic protection rectifier or other impressed current power sources are inspected at intervals not exceeding 2 ½ months, but at least six (6) times per calendar year.

- For regulated lines, each critical bond, each reverse current switch and each diode are inspected at intervals not exceeding 2 ½ months, but at least six (6) times per calendar year. Other interference bonds are inspected once per calendar year, not to exceed 15 months.
- Pronto currently does not have any non-coated, non-cathodically protected regulated pipelines. If it were to build such pipelines in the future, such pipelines will be reevaluated once per three (3) year interval, not to exceed 39 months and where active corrosion is detected the pipelines will be cathodically protected. Evaluation of non-coated pipelines will be conducted through close interval survey (CIS), or when a CIS in impractical, through record evaluations (leak history, etc.).

3.2 Chemical Treatments

3.2.1 Responsibility

Operations is responsible for the supervision of corrosion control activities including inspection and reporting requirements as specified herein.

3.2.2 Requirements

- Methanol may be periodically injected as needed to prevent gas hydrates. No other routine chemicals are injected into the pipelines.

3.3 Fluid Management

Field dehydration occurs at the compressor stations to minimize the formation of hydrates in the pipeline segments connecting the compressor stations and processing plant. Pipeline segments between the tank batteries and processing plants are pigged on a periodic basis to remove water and hydrocarbon liquids and may be treated with methanol as needed to prevent hydrates.

3.4 Tank Operations

Pronto does not own or operate storage tanks on the pipeline segments regulated by 19.15.28 NMAC. Pronto owns water and condensate tanks located at various compressor stations within the gathering system, and such tanks are operated in accordance with the applicable air permits associated with those stations.

4.0 PROCEDURES TO REDUCE RELEASES

NMOCD Guidelines
- Procedures to reduce venting and flaring during maintenance, emergencies and malfunctions
- Procedures for reporting scheduled maintenance and emergencies to upstream operators
- Emergency response plan
  - Source elimination
  - Reporting to regulatory agencies

4.1 Procedures to reduce Venting and Flaring During Maintenance, Emergencies and Malfunctions

4.1.1 Responsibility

Operations is responsible for pipeline/gathering system maintenance and handling emergencies and malfunction events.

4.1.2 Requirements

- Pronto operates a variable pressure pipeline gathering system and in many instances has the ability to pack the pipeline in the event a compressor station or processing plant are unable to take the natural gas for a short duration. Normal operations of the pipeline gathering system does not require the need for flaring or venting of natural gas.
- Pronto uses portable flare stacks and other flares and/or thermal combustors as required during pipeline blowdowns to minimizing venting.

4.2 Procedures for Reporting Scheduled Maintenance and Emergencies to Upstream Operators

4.2.1 Responsibility

Pronto's Operations and support staff are responsible for reporting to upstream operators in accordance with 19.15.28.8 (D) NMAC.

4.2.2 Requirements

- Pronto provides written notification to upstream operators no less than 14 days prior to the date of scheduled maintenance, replacement or repair of a natural gas gathering system. The notification includes the date and expected duration that the system will not gather natural gas.
- As soon as possible but no more than 12 hours after discovery of an emergency or malfunction, or the need for unscheduled maintenance of a natural gas gathering system, Pronto provides verbal notification to each upstream operator whose natural gas is gathered by the system of the date and expected duration that the system will not gather natural gas, and provides written confirmation of the verbal notification, including the date, time, person, and telephone number to whom verbal notification was given no later than 24 hours after discovery.
- Pronto makes and will keep a record of each notification for no less than five years and make such records available for inspection by the OCD upon request.

4.3 Emergency Response Plan

Pronto has a corporate emergency response plan to provide a systematic approach to handling emergency situations. Emergency situations can rarely be anticipated and usually require immediate action by those involved.

4.3.1 Source Elimination

Protection of the public is the primary concern during the initial stages of an emergency. This is generally accomplished by:

1. Isolation and containment,
2. Blowdown or flaring of hydrocarbons,
3. Evacuation, and/or
4. Deliberate ignition of the leak if safe and appropriate

Upon determining that a leak has occurred the operator-on-duty does the following:

1. Isolate the emergency by closing the appropriate block valves, and
2. Initiate the applicable response, as defined in the emergency response plan.

4.3.2 Reporting to Regulatory Agencies

In the event that the person-in-charge wishes to alert additional persons to provide assistance or to take command of the situation, Operations will be contacted to dispatch the appropriate personnel.

REGULATORY AGENCY REPORTS/TELEPHONE NUMBERS

Agency	Number
Office of Pipeline Safety-DC	800-424-8802 or 202-366-4595 FAX 202-366-4566
Pipeline Safety Bureau	505-476-0298
NMOCD Artesia Office	575-626-0830
NMOCD Hobbs Office	575-241-7063
NMOCD Emergency Number for SE NM	575-626-0830
National Response Center	800-424-8802
OSHA	800-321-OSHA

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
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District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
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QUESTIONS

Action 184715

QUESTIONS

Operator: Pronto Midstream, LLC 5400 LBJ Freeway Dallas, TX 75240	OGRID: 331527
	Action Number: 184715
	Action Type: [NGGS] NGGS Operations Plan (NGGS-OP)

QUESTIONS

Verification	
Does the operator own the selected facility	Yes
Is the selected facility a natural gas gathering system	Yes

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ACKNOWLEDGMENTS

☑	I certify that, after reasonable inquiry, the statements in and attached to this Natural Gas Gathering System Operations Plan are true and correct to the best of my knowledge and acknowledge that a false statement may be subject to civil and criminal penalties under the Oil and Gas Act.