

**UIC - 1 -   9**

**H2S  
CONTINGENCY  
PLAN**

**DATE: \_\_\_\_\_**

## Chavez, Carl J, EMNRD

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**From:** Chavez, Carl J, EMNRD  
**Sent:** Thursday, November 19, 2009 7:45 AM  
**To:** 'Bob Patterson'; 'Dan Gibson'; 'Schmaltz, Randy'; 'Moore, Darrell'; 'Lackey, Johnny'  
**Cc:** Sanchez, Daniel J., EMNRD; VonGonten, Glenn, EMNRD; Griswold, Jim, EMNRD  
**Subject:** UIC Class I Disposal Well Annual Report Schedule for Submittal & Content REMINDER- 2010  
**Attachments:** Class I Disposal Well Annual Report Tracking 2010.xls; 19.15.11 NMAC.doc

Gentlemen:

Good morning. You may recall an e-mail message from me this past Summer alerting you to the reporting provision of your current discharge permit (permit) and how the New Mexico Oil Conservation Division (OCD) is stepping up its efforts to track reporting under issued permits.

Please find attached a spreadsheet listing the dates that OCD expects to receive your Annual Reports and/or any reporting requirements from your permit. If you are an operator with limited reporting requirements based on your permit, you are welcome to follow the format and content required from more recent permit renewals issued by the OCD, which are more comprehensive and constitute a report. Any renewed permits will likely require similar content anyway.

You will notice that a Hydrogen Sulfide Contingency Plan (CP) (see attached 19.15.11 NMAC Regulations) has been written into a couple of new Navajo Refining Company permits. This regulation became effective on December 1, 2008 and applies to any facility or well where the hydrogen sulfide concentration is at or greater than 100 ppm. Consequently, if your facilities meet or exceed this concentration, you are required to have an H2S CP for your facility regardless of whether the OCD has required it in your permit. The OCD believes that all UIC Class I Disposal Well Facilities require an H2S CP; therefore, the OCD is requesting your H2S CP(s) by Wednesday, March 31, 2010, unless a different date for submittal is specified in your permit. Also, if you are an operator with multiple wells, you may develop one CP, but you must address each well location with site specific details in that one CP.

Please plan on meeting the Annual Report submittal dates in January of 2010 as failure to submit the report will constitute a violation under the Federal Underground Injection Control (UIC) Program and reporting to the United States Environmental Protection Agency, which could result in the shut-in and/or plug and abandonment of your Class I disposal well. Failure to meet the H2S CP requirement may also result in the shut-in of your well operations; consequently, the OCD is hopeful you will satisfy the regulations pertaining to this deadly gas.

Please contact me if you have questions. Thank you in advance for your cooperation in this matter.

Carl J. Chavez, CHMM  
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(Pollution Prevention Guidance is under "Publications")

CC: UIC Class I Well File "Annual Reporting" and "H2S Contingency Plan"