

SUPPLEMENT TO THE DISCHARGE PERMIT APPLICATION REVISION 2

Property: North Hobbs Recompression Facility and Natural Gas Liquids Plant 32.7185963° North, -103.1997316° West Hobbs, Lea County, New Mexico

May 30, 2023

Prepared for:

Occidental Permian Ltd. 5 Greenway Plaza, Suite 110 Houston, Texas 77046-0521

Ensolum, LLC | Environmental, Engineering & Hydrogeologic Consultants 10333 Harwin Drive, Suite 470 | Houston, TX 77036 | ensolum.com

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1.0 INTRODUCTION

This document provides supplemental information to a discharge permit application for the North Hobbs Recompression Facility (RCF) and Natural Gas Liquids (NGL) Plant, herein after referenced as Facility which is operated by Occidental Permian Ltd. (Oxy) in response to a notice from the New Mexico Oil Conservation Division (NMOCD) stating the Facility is subject to the permitting requirements of Title 20, Chapter 6, Part 2 of the New Mexico Administrative Code (NMAC). There are no intentional discharges to groundwater at the Facility. Instead, this discharge permit application describes the measures in place to prevent potential discharges to groundwater of any water contaminant listed in 20.6.2.3103 NMAC or any toxic pollutant. Existing regulatory and operational programs are discussed in the context of site-specific environmental and operational conditions to verify inadvertent releases of liquids stored and used at the Facility are minimized and contained, waste is managed appropriately, and groundwater resources are protected.

This supplement to the discharge permit relies heavily on the following existing document, which can be make available at the request of NMOCD:

- North Hobbs Plant Emergency Response Plan
- Material Safety Data Sheets for any non-oil-based chemicals stored at the Facility.

Specific components of the existing plans and policies are referenced in subsequent sections of this document.

2.0 FACILITY DESCRIPTION

The Facility is located approximately 4 miles northwest of Hobbs, New Mexico in Lea County (32.7185963°North, -103.1997316°West) within the South Half of the Southwest Quarter (S1/2 SW1/4) of Section 25, Township 18S, Range 37E as depicted on **Figure 1**.

The Reinjection Compression Facility (RCF) has 9 inlet compressors and motors totally 36,000 hp. Field gas is brought in from several production satellites and battery's (Up to 300 MMSCFD) and then returned to the field injection system. There is an NGL Plant that takes a split stream of 95 MMSCFD and produces 1300 bbls a day of NGL and is sold down the pipeline.

2.1 Property, Operator, and Facility Ownership and Contacts

The following list outlines key entities associated with the Facility, OGRID 157984.

Facility Name:

North Hobbs Recompression Facility and NGL Plant 32.7185963°North, -103.1997316°West Lea County, New Mexico

Landowner:

Occidental Permian Ltd. 5 Greenway Plaza, Suite 110 Houston, Texas 77046-0521



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Facility Owner and Operator:

Occidental Permian Ltd. 5 Greenway Plaza, Suite 110 Houston, Texas 77046-0521

Key Facility Contact:

Chris Poe Plant Team Lead P.O. Box 27570 Houston, Texas 77227 (806) 229-9728 Chris_Poe@oxy.com

2.2 Facility Diagrams

Facility maps and diagrams are described below and referenced as attachments or as part of the Draft SPCC Plan:

- A topographic map depicting topography and the location of the Facility relative to nearby environmental receptors (waterways and water wells) is included as **Figure 1**.
- A Site Layout depicting an aerial image of the Facility is included as Figure 2.
- A Facility Layout diagram depicting detailed components of the Facility, including locations, capacities, and contents of all storage containers and process flow-through vessels; storage areas; underground tanks or sumps; connection pipelines; and containments are included as **Figure 3**.

2.3 Fencing

The Facility includes an outer chain-link perimeter fence. The location of the Facility boundaries is depicted on **Figure 3**.

2.4 **Process Description**

The function of the facility is to clean and compress CO₂ field gas to reinjection pressure, separate water/hydrocarbon field liquids, and process natural gas liquids.

2.5 Tanks

The Facility utilizes aboveground storage tanks (ASTs), totes, and underground sumps for storage. The locations of these tanks are included on the Facility Diagram in **Figure 3**. Details about tank content, size, and construction are included in **Table 1**. Chemicals, such as corrosion inhibitors are stored in small totes and 5-gallon buckets temporarily for maintenance on equipment.

2.6 Process Vessels

This Facility utilizes oil-filled manufacturing equipment (i.e. flow-through process vessels) for continuous recovery and/or intermediate storage of liquids entrained in natural gas. Their locations are identified on the Facility Diagram in **Figure 3**.



2.7 Secondary Containment

Containment walls constructed of steel are used as secondary containment for large liquid storage ASTs. For drums and totes, portable containment constructed of plastic/HDPE are used for secondary containment. The location of the secondary containment facilities are identified on the Facility Diagram in Figure 3. All bulk storage container installations are constructed so that a means of secondary containment is provided for the entire capacity of the largest container and sufficient freeboard to contain precipitation. Secondary containment areas are sufficiently impervious to contain discharges of oil and other liquids.

2.8 Loading Areas

The majority of the liquids arrive and exit the Facility through pipelines. Trucks may occasionally receive wastewater from tanks or sumps and these activities occur at tank loadouts. Spill control equipment including dedicated catch pans, spill pans, sorbent materials, and/or spill control boom are present to provide spill control truck loading. To prevent premature vehicular departure, the Facility has warning signs in the loading areas. The Facility also requires that truck drivers chock their wheels prior to loading. Drains and outlets on tank trucks and tank cars are checked for leakage before loading/unloading or departure and, if necessary, are tightened, adjusted or replaced.

2.9 **Storage Areas**

The Facility utilizes indoor storage areas, outdoor storage area, and roll-off boxes to store materials and equipment within the Facility. A storage area includes equipment that has not been in service including valves, piping, fittings, gaskets, and bolts/tools. Any liquids stored in storage areas are stored in plastic or stainless-steel totes/containers and fitted on individual containment structures.

2.10 Pits, Ponds, and Impoundments

There are no pits, ponds, or surface impoundments for liquids storage or waste accumulation at this Facility. There are no ponds, lagoons, or catchment basins for stormwater accumulation.

2.11 **Disposal Facilities**

There is no on-site disposal at the Facility.

SITE CHARACTERISTICS 3.0

The following sections describe the hydrologic/geologic characteristics in the vicinity of the Facility.

3.1 General Description of Topography, Elevations, and Vegetation Types

The Facility is located within a portion of the Southern High Plains Surface Water Basin and within the Lea County Declared Groundwater Basin¹. The Southern High Plains area has been historically called Llano Estacado. Generally, the area is a topographically isolated plateau south of the Canadian River and consists mostly of relatively featureless, flat to gently rolling plains, and moderately sloping upland areas. This area is relatively flat and underlain by a hard caliche

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¹ New Mexico Office of the State Engineer (NMOSE) – online query January 2023

surface. Topsoils are locally and dominantly stabilized with shortgrass species, with few tallgrass species. Shortgrass species include black and blue grama, buffalo grass. Midgrass species include sideoat grama, little bluestem, and plains bristlegrass. Minor woody shrubs are present including feather dalea, catclaw acacia, and vine ephedra². These areas are used for oil and gas development, forage production, farming, wildlife habitat, and recreation, while they also provide aesthetics and watershed benefits³. The Facility is approximately 3,600 ft above mean sea level (amsl).

3.2 Soil Type

Based on the available site-specific and regional subsurface information, the Facility is underlain by the Kimbrough-Lea complex and Kimbrough gravelly loam, dry on 0 to 3 percent (%) slopes. These surficial soils are classified as well drained, moderately permeable soils that formed by sandy eolian deposits that were derived from sedimentary rock and mixed alluvium, specifically, calcareous, loamy eolian deposits from the blackwater draw formation of Pleistocene age over indurated caliche of Pliocene age. Further classification of these soils indicates that the capacity of the most limiting layer to transmit water is very low to moderately low (0.00 to 0.01 inches per hour) and runoff potential is very high. Additionally, there is not a frequency of flooding or pooling⁴.

3.3 Surface Water Features

Figure 1 is a topographic map depicting water bodies, streams, and watercourses within a 1-mile radius of the Facility boundary. There are no natural surface bodies of water or seeps within 0.25 miles of the Facility and where drainages exist in interdunal areas, they are ephemeral, discontinuous, dry washes. **Figure 1** applies the following databases for surface water features: National Wetlands Inventory, National Hydrography Dataset, and United States Geological Survey. No major surface water supplies are available in Lea County, only intermittent streams, lakes, stock ponds, and small playas that collect runoff during thunderstorms⁵. One freshwater emergent wetland is located within 1-mile from the Facility. The feature appears as surface depressions and visual inspection has identified no wetland features such as wetland vegetation or standing water. It appears as a topographic depression that receives surface runoff and temporarily stores precipitation for short periods until evaporation occurs. It is mostly dry except during large storm events. The Facility is located approximately 2.6 miles southwest of Green Meadow Park, which is the nearest significant watercourse.

3.4 Water Wells

Using information from the New Mexico Water Rights Database from the New Mexico Office of the State Engineer (NMOSE), three water wells exist within a 0.25 mile radius. Several water wells, specifically 384 water wells, exist within a 1-mile radius of the Facility boundary and are identified on **Figure 1**. Within 0.25 miles of the Facility boundary there are 16 water wells. The

⁵Lea County Regional Water Plan. Prepared for New Mexico Interstate Steam Commission Regional Water Planning Program. Prepared July 2016.



² United States Department of Agriculture, Natural Resources Conservation Service, Ecological Site R077DY049TX. Online query January 2023

³Lea County Regional Water Plan. Prepared for New Mexico Interstate Steam Commission Regional Water Planning Program. Prepared July 2016.

⁴Natural Resources Conservation Services. Web Soil Survey. National Cooperative Soil Survey. Lea County, New Mexico. Online query accessed January 2023.

https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm

nearest water well with depth to water information is Point of diversion (POD) File Number L-12065-POD1 and is used for drinking and sanitary. The total depth of the well is approximately 190 ft below ground surface (bgs), the static water depth measurement is not recorded, and is completed in the Ogallala formation.

3.5 Shallowest Aquifer

In this area of the Permian Basin, groundwater occurs in the High Plains Aquifer composed of the Tertiary Ogallala Formation and Triassic Dockum Group. Triassic rocks underlying the Ogallala Formation limit downward percolation from the Ogallala Aquifer. The Ogallala Aquifer is unconfined and flows east-southeast in response to gravity. The chief source of groundwater in the proximity of the Facility is the Ogallala Aquifer, specifically, the sand and gravel layers near the lower portion of the formation⁶. The geologic log for POD File Number L-12065-POD1 indicated that rocks suggestive of the Ogallala Formation from 0 to 193 ft bgs and possibly underlying Upper Triassic Dockum Group rocks were encountered in the borehole at approximately 193 to 194 ft bgs.⁷ The average depth to water within a 1-mile radius of the facility is 41.6 ft. Generally, the depth to water in proximity to the Facility ranges from 25 ft to 170 ft bgs.

3.6 Geological Characteristics

The Facility is constructed on Tertiary Ogallala Formation and Triassic Dockum Group. The Ogallala formation uncomfortably overlies Triassic rocks. The thickness of the Ogallala ranges from 0 to 350 ft and contains an upper caliche layer than ranges from a few feet to 60 ft. The caliche layer is more cemented at the top of the formation than the bottom of the formation. Interbedded layers of fine-to medium grained sand and gravel underly the caliche layer and compose the remaining portion of the formation. The sands and gravels are the primary water bearing strata of the formation⁸.

The Upper Dockum Group is believed to conformably overly the Lower Dockum sediments. The reported thickness of the Upper Dockum sediments is approximately 165 ft. Sediments consists of variegated mudstone, siltstone, with minor interbeds of sandstones and conglomerates. The Triassic-age beds dip east-southeastward⁹.

3.7 Site Flooding Potential

Annual precipitation of the region in Hobbs, Lea County, New Mexico is 15.75 inches. The most likely flood events occur from heavy storms during the summer months of June through September resulting from prolonged heavy rainfall over dry areas and is characterized by peak flows of moderate duration. These summer rain showers and thunderstorms account for more than half of the annual precipitation¹⁰. Most of this rainfall collects and runs through dry arroyos, of which none are near the Facility. Based on Federal Emergency Management Agency (FEMA)

7 NMOSE - online query January 2023

¹⁰ Flood Insurance Study Lea County New Mexico and Incorporated areas. Prepared by Federal Emergency Management Agency (FEMA) Flood Insurance Study Number 35025C1350D. Effective December 16, 2008. Online query accessed January 2023. <u>https://msc.fema.gov/portal/advanceSearch</u>



⁶ Lea County Regional Water Plan. NMISC RWPP 2016

⁸ Leedshill-Herkenhoff, Inc., John Shomaker & Associates, Inc., and Montgomery & Andrews, P.A. 2000. Final report, Lea County regional water plan. Prepared for Lea County Water Users Association. December 7, 2000.

⁹ Leedshill-Herkenhoff, Inc. et al., 2000

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National Flood Hazard Layer (NFHL), there is not a mapped floodplain within a 5-mile radius of the Facility.

3.8 Groundwater Characteristics

The chief source of groundwater in the proximity of the Facility and Lea County underground water basin is the Ogallala Aquifer, specifically, the sand and gravel layers near the lower portion of the formation¹¹. Groundwater use and extraction is restricted to new applications as recharge of the Ogallala Aquifer is diminishing. Generally, groundwater quality in Lea County is excellent in the Ogallala and alluvial aquifers, but of poor quality in other geologic formations due to the presence of salt, gypsum, and other evaporite deposits. The presence of shallow saline water in Lea County prompted the New Mexico Oil Conservation Commission's Order No. R-3221, banning the surface disposal of produced water into unlined pits within the state (OCC, 1968). Lining of pits and better management of leaking oil and gas wells has improved the quality of water. Additionally, groundwater quality is also impacted by municipal and industrial sources including agriculture¹². Generally, the groundwater sourced near Hobbs has total dissolved solids (TDS) content ranging from 300 to 415 milligrams per liter (mg/l) and generally closer, while high, are acceptable for domestic supply. Fluoride concentrations are also high, but acceptable, ranging from 0.9 to 1.2 mg/l. Chlorides concentrations are moderate, at concentrations varying from 30 to 120 mg/l, and sulfates are low ranging from 50 to 120 mg/l¹³.

4.0 POTENTIAL DISCHARGES

There are no intentional discharges at the Facility. The NMOCD has determined inadvertent discharges of liquids or improper disposal of waste solids stored at the Facility have the potential to impact groundwater. The information provided below discusses Facility operations and use or storage of any materials, as requested by NMOCD. Similar procedures for storage and handling are applied to chemicals that are not oil-based.

The ASTs, volume of containers and associated containments, as well as predicted direction of a release should containment fail are included in **Table 1**.

Miscellaneous chemicals that are not always on-site but are included in Safety Data Sheet (SDS) inventory because they are sometimes used for maintenance of equipment. These materials are maintained temporarily at minimal volumes and stored in a shed or closet when present. The SDS for these materials can be provided at the request of the NMOCD.

4.1 Onsite Disposal

This Facility does not have an onsite disposal system. There are no injection wells onsite. All condensate, produced water, slop tanks, and rainwater is collected in sumps or is stored in fixed roof ASTs and then sent off-site via pipeline or trucked by an approved Oxy third-party vendor to an approved disposal facility.

¹¹ Lea County Regional Water Plan. NMISC RWPP 2016.

¹² Leedshill-Herkenhoff, Inc. et al., 2000

¹³ Leedshill-Herkenhoff, Inc. et al., 2000

4.1.1 Sanitary Sewage

Sanitary sewage is a separate system and does not commingle with any process waste generated by gas processing at the Facility. Sanitary sewage is treated and released into a septic leach field located within the Facility property line. The septic system is located on the Facility Layout in **Figure 3**. The liquid waste permit is included in **Appendix D**.

4.2 Offsite Disposal

Liquid and solid waste are collected at the Facility, properly characterized, and transported via an Oxy approved third-party vendor for offsite disposal (see table below). Oxy has established methods of disposal for recovered materials in accordance with applicable legal requirements. The Oxy Field Environmentalist coordinates the disposal of any transported materials.

Waste/Product Stream	Waste Classification	Estimated Volume/ Year	Type of Disposal/Recycle	Trucked (by whom)	Disposal Site Name	Disposal Location
Domestic Trash	Domestic Trash	100 Yards	Landfill	Waste Management	Lea County Landfill	3219 NM-176 Eunice, NM 88231
Used Filters	Used Filters	120 Yards	Landfill	Sundown Services	R360	4507 W Carlsbad Hwy Hobbs, NM 88240

4.3 Wastewater

Process wastewater from dehydration and separation consists of produced water with minor hydrocarbon constituents and is stored in ASTs in secondary containment as shown on the Facility Diagram. In general, process wastewater is stored in ASTs and then transported via an Oxy approved third-party vendor for offsite for disposal.

4.3.1 Closed Drain System

The Facility operates a closed drain system between process vessels and is also available for use to collect and separate wash water for equipment maintenance on an as-needed basis as well as stormwater before being directed to the ASTs and then transported via an Oxy approved third-party vendor for offsite for disposal.

4.4 Stormwater Management

Stormwater surface flow is depicted on the Facility Diagram and is generally directed through the Facility to avoid contact with equipment and storage containers/tanks. The facility is located on flat ground with little to no slope. In general, stormwater surface flow travels north/northwest. Stormwater that is not collected in secondary containments is directed away from equipment and storage containers/tanks via site grading to avoid contact and then allowed to evaporate or infiltrate into the ground. Any stormwater collected in secondary containment is directed to sumps associated with each containment and recovered by a third-party vacuum truck for off-site disposal. Stormwater that may collect in tank cellars is also connected to the sump system. The Facility has a low potential for undiked drainage at the Facility. The potential undiked drainage would come from truck transfers and would be de minimus in nature and contained onsite. If a situation requires the discharge of accumulated stormwater to ground surface, qualified Facility personnel will visually evaluate the water quality to ensure the release of uncontaminated stormwater only. Facility personnel will record the date, area(s) inspected, and results of the evaluation(s). The evaluated stormwater must be clear and free of color; odor; floating, settled, suspended solids; foam; and/or oil sheen to be authorized for any discharge. Currently, no stormwater is discharged, and it is all collected in the sumps.



4.4.1 Storage Tank Bottom Sludge/Sludge

Oils and sludge can accumulate in the bottom of compressor skids, containments, or tanks. Tanks may be periodically taken out of service for integrity inspections and/or service changes. This material is collected as E&P waste via an Oxy approved third-party vendor and disposed of offsite at a nearby disposal facility.

4.4.2 Maintenance Materials

During equipment maintenance, used oils are collected and stored in containers with general secondary containment. Periodically, this material is shipped off-site for recycling or disposal. Various quantities of lubricants, oils, and unused other chemicals that are used for operations are stored outside on pallets.

4.4.3 Petroleum Hydrocarbon Impacted Soil

Nonhazardous soils that may be impacted with petroleum products are promptly removed and disposed in accordance with local, state or federal disposal requirements. Secondary containment systems are provided to prevent releases.

4.4.4 Miscellaneous Solid Waste

Non-hazardous solid waste is segregated on-site and contained in roll-off boxes that are inventoried and labeled pending removal from the facility according to the waste stream. These include, but are not limited to waste from the office, E&P waste from operations, process filters, and scrap metal. All are segregated, handled, transported, and disposed of in accordance with local, state, and federal disposal regulations.

4.4.5 Ponds, Lagoons, Catchments

There are no ponds, lagoons, or catchment basins on-site.

4.4.6 Groundwater Contamination

There is currently no known groundwater contamination associated with the Facility.

4.4.7 Commingled Waste Streams

There are no commingled waste streams at the Facility.

5.0 COLLECTION AND STORAGE SYSTEMS

ASTs and sumps are used throughout the Facility to hold and store condensate, process wastewater and stormwater which is then trucked offsite via an Oxy approved third-party vendor for disposal. Condensate ASTs are equipped with high level alarms and sumps have visual gauges. Pumps, valves, and piping systems are used throughout the Facility to transfer various liquids among tankage and process vessels.

Lube oil and casing oil are stored in aboveground fixed containers. Current contents and total capacity are listed in **Table 1**. The Facility also receives, stores, and uses a variety of additives and chemicals that are stored in small volumes in totes and other containers. Oil-filled operational equipment and storage containers are used to manage the process flow. The condition of secondary containment and containment pad/liners is inspected and maintained as needed.



Oxy implements a mechanical integrity plan for equipment including tanks. The plan specifies inspection activities designed to assure mechanical integrity of equipment and verify the equipment is fit for service.

5.1 Buried Storage Tanks

The Facility does not have buried storage tanks installed at the site.

5.2 Sumps

Sumps are utilized to collect stormwater. These are connected by drains and pumped on an asneeded basis to ASTs to be disposed off-site via an Oxy approved third-party vendor.

5.3 Buried Piping

The facility has changed ownership multiple times before being acquired and operated by Oxy. Historical documentation related to buried piping specifications is not available. Oxy employs the following best management practices for buried piping installation and maintenance:

- New or replaced buried piping is cathodically protected and is installed with a protective wrapping or coating.
- If a section of buried line is exposed, it is inspected for signs of deterioration and corrective actions are taken as indicated by the magnitude of the damage.
- Integrity and leak testing of buried piping is performed at the time of installation, modification, construction, relocation, and/or replacement.

5.4 Effluent Treatment Facilities

This facility does not have an effluent treatment system.

5.5 Aboveground Valves and Piping

This facility has aboveground piping and valves that are regularly examined during normal facility walk-throughs for general condition and any necessary corrective action items are addressed. Facility walk-throughs are generally conducted on a daily basis for flange joints, expansion joints, piping supports, metal surfaces, catch pans, and valve locks and/or seals.

6.0 INSPECTION, MAINTENANCE, AND REPORTING

Oxy personnel and contractors routinely conduct inspection, maintenance, and repair of all tanks, equipment, instrumentation, valves, piping, and other items necessary for the continued safe operation of the Facility. These activities involve recordkeeping and reporting. All bulk storage containers are inspected monthly. Any malfunctions, improper operations of equipment, evidence of leaks, stains, or discolored soils, etc. are logged and communicated to the Operations Team Leader. Typical inspection forms can be found in **Appendix E**.

The Facility is staffed 24 hours a day, 7 days a week by field operations personnel. The leak detection process consists of a visual examination while performing a daily walk-through of the facility, including tank areas, oil-filled flow through vessels, and transformers. Field operations personnel check the equipment for leaks and proper operation. They examine all aboveground valves and flowline piping. Personnel inspect pumps to verify proper function and check for damage and leakage. They look for accumulation of liquids within the secondary containment and verify the condition and position of valves. The storage tanks are gauged/monitored on a



continual basis. All malfunctions, improper operation of equipment, evidence of leakage, stained or discolored soil, etc. are logged and communicated to the Operations Team Leader.

Aboveground piping was designed and installed according to 40 CFR 112.8(d). Facility personnel conduct monthly visual surveillance of pipe sagging, corrosion, abrasion, expansion joints, valve locking mechanisms, catch pans, pipeline supports, and metal surfaces. Problems with containment systems and potential signs of leaks, puddles, corrosion of the liner, holes in the berm, buildup of precipitation or deterioration to the structure are reported to the Operations Team Leader for scheduled immediate repairs.

Oil-filled equipment is designed and constructed according to good engineering practices and industry standards. The compatibility of the oil and container's construction material has been evaluated prior to use. Preventive maintenance based on regular scheduled visual inspections, tests, or evidence of the oil spills and/or problems that may occur can be quickly identified and resolved. Drums, totes, or any additional portable containers on-site, are typically elevated on separate containment pallets without direct contact to the ground which poses a minimal risk of corrosion and allows for all sides of the containers to be inspected. All oil containing drums, totes, or portable tanks are inspected monthly (non-documented) and handled as needed basis.

The waste stream profiles are recorded and documented for regulatory compliance. Annual waste management trainings are conducted by Oxy's personnel that includes a review of operation and maintenance of equipment to prevent discharges; applicable pollution control laws, rules and regulations; general Facility operations; persons accountable for discharge prevention. Moreover, a review of Oxy's policies and procedures related to spill prevention, cleanup, disposal, reporting, inspections, and routine handling of products will be covered during the training.

7.0 PROPOSED MODIFICATIONS

No modifications of the existing collection, treatment, and/or disposal systems are proposed at this time. However, in the case of Facility expansion or process modifications, the Facility will notify NMOCD in writing for modification of this discharge permit. An application and a description of the requested modifications will be included in the written notice.

8.0 SPILL/LEAK PREVENTION AND REPORTING PROCEDURES (CONTINGENCY PLAN FOR RELEASES)

Oxy has implemented an Emergency Action Plan (EAP). The EAP describes processes necessary to respond to not only discharges of petroleum products but any release of a water contaminant that could potentially cause harm. A general response will include ensuring all personnel are notified, isolating the source, establishing an appropriate perimeter and control points, and assessing the hazard, then implementing appropriate control measures. These actions vary based on size and source and are described in the existing attached plans. In the event of a sizeable release, Oxy will work closely with NMOCD to develop a plan for remediation according to 19.15.29 NMAC. For de minimis (less than 5 barrels) releases, the response will generally involve stopping the release (if applicable), use of absorbent materials, collection and containerization of the spill and any contaminated media, and notification of additional response personnel if needed. Chemicals stored on site that are not oil-based are minimal in volume and unlikely to result in a discharge to groundwater based on extent, underlying lithology, and short-term identification and response associated with a manned facility.

8.1 Notification Procedures

Notification of discharges in accordance with local, state, and federal requirements will be directed by the Operations Team Leader in accordance with Oxy's North Hobbs Plant EAP located in



Appendix C. The Operations Team Leader will provide information regarding the characteristics of the materials and equipment involved and provide access to Oxy resources as requested by responding agencies. The Plant Team Lead will determine if emergency contractors are needed and contact them for assistance. In addition, the Plant Team Lead will perform a site inspection to verify any spill at the facility of a reportable quantity or if any quantity has reached a waterway and will report such spills to the appropriate governmental agency. For all releases, regardless of volume, Oxy will comply with 19.15.29.

9.0 PUBLIC NOTICE

Oxy will provide written notice of the Discharge Permit Application by the following methods per Subsection B of 20.6.2.3108 NMAC.

- One sign measuring at least 2 feet by 3 feet will be displayed at the main entrance to the Facility. The sign will display the public notice in English and Spanish languages and be displayed for 30 days.
- One additional notice will be posted at the Hobbs, New Mexico Post Office. The sign will display the public notice in English and Spanish languages and be displayed for 30 days.
- Written notice will be given by mail or electronic mail in English and Spanish to owners of all properties within 1/3-mile distance from the property boundary of the Facility.
- A summary of the notice will be given in English and Spanish languages in a display ad at least 3 inches by 4 inches in a newspaper of general circulation (not in a classified or legal advertisement section) in the *Hobbs News-Sun*, a newspaper of general circulation in southeastern New Mexico.

9.1 Schedule

Oxy will issue public notice within 30 days after the NMOCD determines the Discharge Permit application is administratively complete. This includes public notice to the newspapers and mailings to the appropriate surface owners identified for distribution. The newspaper publication will run for 1 business day.

Within 15 days of completion of the public notice requirements, Oxy will submit proof of notice to the NMOCD that includes an affidavit of mailings and a list of property owners, proof of publication in a newspaper, and an affidavit of posting.

9.2 Proposed Public Notice

The proposed public notice is presented below and includes the items specified in Subsection F of 20.6.2.3108.



NOTICE OF PUBLICATION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations (20.6.2.3106 of the New Mexico Administrative Code), the following discharge permit application has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3441:

> NMOCD Discharge Permit Number GW-XXX Occidental Permian Ltd. North Hobbs Recompression Facility and NGL Plant Hobbs, Lea County, NM 32.7185963°North, -103.1997316°West S1/2 SW1/4, Section 25, Township 18S, Range 37E Mr. Chris Poe (806) 229-9728, Chris Poe@oxy.colm

Oxy announces the submittal of an application for potential unintended discharges at the North Hobbs Recompression Facility (RCF) and Natural Gas Liquids (NGL) Plant located approximately 4.0 miles northwest of Hobbs, New Mexico (32.71859630North, -103.1997316⁰ West). The Facility is a natural gas recompression facility through which oil, natural gas, and condensate from nearby oil and gas production facilities is transported by pipeline for treatment and processing. The RCF has 9 inlet compressors and motors totaling 36,000 hp. Field gas is brought in from several production satellites and battery's (Up to 300 MMSCFD) and then returned to the field injection system. There is an NGL Plant that takes a split stream of 95 MMSCFD and produces 1300 bbls a day of NGL and is sold down the pipeline. Once gathered at the Facility, the oil and gas are compressed through cryogenic processing, dehydrated to remove the water content, and processed to remove and recover natural gas liquids. The discharge permit includes a description of materials stored and used at the Facility and any waste generated for off-site disposal. Groundwater at the facility is estimated to be less than 170 ft below ground surface (bgs) and contains total dissolved concentrations (TDS) of approximately 300 to 415 milligrams per liter (mg/l). The discharge permit addresses how liquids and solid waste will be handled, stored, and disposed of, including procedures to prevent an unintended discharge. Response actions and abatement requirements for spills and leaks are addressed.

The NMOCD has determined the application is administratively complete and is in the process of preparing a draft permit. The NMOCD shall post notice on its website and distribute notice of the submittal of the application to affected local, state, federal, tribal, or pueblo government agency, political subdivisions, ditch associations, and land grants as identified by the department, and persons on a general and facility-specific list maintained by the department who have requested notice of discharge permit applications. Interested persons may obtain information, submit comments, and request to be placed on a facilityspecific mailing list for future notices. The NMOCD will also accept comments and statements of interest regarding the application and will create a facility-specific mailing list for persons who wish to receive future notices. Prior to ruling on any proposed permit, the Director shall allow a period of at least (30) days after the draft permit is posted, during which time interested persons may submit comments.

Persons interested in obtaining further information, submitting comments, or requesting to be on a facility-specific mailing list for future notices may contact the Oil Conservation Division contact listed below:

> Ms. Shelly Wells New Mexico Oil Conservation Division Energy Minerals and Natural Resources Division 1220 South St. Francis Drive Santa Fe, NM 87505 (505) 469-7520, Shelly.Wells@emnrd.nm.gov



May 30, 2023

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10.0 FACILITY CLOSURE/POST CLOSURE PLAN

Since this discharge permit is for unintended discharges, a closure and post-closure plan must include the entire Facility (**see Appendix F**). The following general procedures and associated tasks listed in **Appendix F** will apply to prevent impacts to groundwater upon cessation of Facility operations:

- Oxy will remove all fluids from ASTs. The liquids and sludges will be contained and disposed of off-site as described above in **Section 4.2**.
- Liquids that are not oil-based will be segregated. Any unused chemicals will be identified and profiled, then handled and disposed of using a third-party waste handler licensed and certified to handle hazardous and non-hazardous waste.
- All ASTs storage vessels, process equipment, and piping will be dismantled and removed from the Facility. Buried tanks and sumps will be excavated. Disposal of scrap material and equipment will be through recycling or offsite disposal based on appropriate waste profiling.
- Below ground piping will be cut at least 3 ft bgs, capped on both ends, and buried in place.
- Any solid waste, such as building materials, concrete, containment metal, liner, and miscellaneous metal or lumber will be recycled or disposed offsite as solid waste.
- Any releases that were deferred under 19.15.29 NMAC will be addressed under the requirements of Part 29.
- Once all equipment has been removed, Oxy will collect soil samples from each plant process area. Sample locations will be based on operations and designed to identify any residual impacted soil prior to reclamation.
 - Soil samples will be collected from the ground surface and field screened for volatile organic compounds (VOCs) utilizing a calibrated photoionization detector (PID) and chloride using Hach[®] chloride QuanTab[®] test strips. If field screening indicates the samples exceed 100 milligrams/kilogram total petroleum hydrocarbons (TPH) or 600 mg/kg chloride, a hand auger will be used to advance a borehole in that location. Samples will be collected every foot until field screening indicates residual impacts are absent. If the boreholes are advanced deeper than 4 feet, field screening results will be compared to 2,500 mg/kg TPH and 20,000 mg/kg chloride.
 - All soil samples will be placed directly into pre-cleaned glass jars, labeled with the location, date, time, sampler name, method of analysis, and immediately placed on ice. The soil samples were transported at or below 4 degrees Celsius (°C) under strict chain-of-custody procedures to a certified laboratory for analysis of the following chemicals of concern (COCs): BTEX following United States Environmental Protection Agency (EPA) Method 8021B; TPH-GRO, TPH-DRO, and TPH-motor oil range organics (MRO) following EPA Method 8015M/D; and chloride following EPA Method 300.0.
 - Laboratory analytical results will be compared to the requirements of 19.15.29 NMAC and reported, addressed, and closed according to those regulations.



11.0 FINANCIAL ASSURANCE

The estimated costs for closure/post-closure activities are located in **Appendix F.** Once NMOCD approves this plan, Oxy will submit financial assurance to the NMOCD in the amount of the facility's estimated closure and post-closure costs within 30 days of NMOCD's approval. The financial assurance will be provided on NMOCD prescribed forms or forms otherwise acceptable to the NMOCD, payable to the NMOCD.

12.0 GROUND WATER DISCHARGE PERMIT APPLICATION AND PERMIT FEES

Pursuant to 20.6.2.3114 NMAC, a filing fee of \$100.00 is being submitted with this application. The appropriate permit fee for a compressor station will be submitted within 30 days of receipt of the approved Discharge Permit.

13.0 CERTIFICATION

Include a certification statement: CERTIFICATION: I hereby certify that the information submitted with this application is true, accurate, and complete to the best of my knowledge and belief.

Printed Name: _____

Signature: _____

Title:

Occidental Permian Ltd. 5 Greenway Plaza, Suite 110 Houston, Texas 77046-0521





APPENDIX A

Figures

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APPENDIX B

Tables

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TABLE 1 STORAGE TANKS AND CHEMICAL TOTES LOCATED AT THE FACILITY North Hobbs RCF and NGI Plant Occidental Permian Ltd. Lea County, New Mexico						
Aboveground Storage Tanks	Quantity	Maximum Capacity (bbls)	Predicted Direction of Flow	Location	Container Type	Storage/Containment
Oil/Water Gun Barrel	1	10,000	North/Northwest	Western Side of Facility	Steel	Earthen Berm
Oil/Water Gun Barrel	1	10,000	North/Northwest	Western Side of Facility	Steel	Earthen Berm
Produced Water	1	10,000	North/Northwest	Western Side of Facility	Steel	Earthen Berm
Produced Water	1	5,000	North/Northwest	Western Side of Facility	Steel	Earthen Berm
Crude Oil	1	1,500	North/Northwest	Western Side of Facility	Steel	Earthen Berm
Crude Oil	1	1,500	North/Northwest	Western Side of Facility	Steel	Earthen Berm
Triethylene Glycol	1	10	North/Northwest	TEG Skid	Metal Grounded Tank	Steel Containment/Unlined
Methanol	1	500	North/Northwest	Methanol Storage Area	Metal Grounded Tank	Steel Containment/Unlined
Methanol	1	533	North/Northwest	Methanol Storage Area	Metal Grounded Tank	Steel Containment/Unlined
Totes and Drums		Maximum Capacity (gallons)	Predicted Direction of Flow	Location	Container Type	Storage/Containment
HBC TC Oil	1	500	North/Northwest	North Side of Facility	Steel	Plastic/HDPE Portable Containment
HDAX 5200 Low Ash Motor Oil	2	1,500	North/Northwest	Compressor Building Area	Steel	Concrete Containment (inside building)
460 Cylinder Oil	4	1,500	North/Northwest	Compressor Building Area	Steel	Concrete Containment (inside building)
NGL Storage	1	30,000	North/Northwest	Eastern Side of Facility	Steel	Earthen Berm
Motor Oil	2	800	North/Northwest	Compressor Building	Steel	Steel Portable Containment
PTI 100	1	800	North/Northwest	Propane Tank Area	Steel	Steel Portable Containment
Lubricant (Corina K-460)	3	1,000	North/Northwest	Compressor Building	Metal Grounded Tank	Steel Containment/Unlined
Lubricant (SD-150))	3	1,000	North/Northwest	Compressor Building	Metal Grounded Tank	Steel Containment/Unlined
Lubricant (Pegasus 150)	1	500	North/Northwest	Compressor Building	Metal Grounded Tank	Steel Containment/Unlined
Lubricant (T-68)	1	55	North/Northwest	Compressor Building	Metal Drum	Concrete Containment (inside building)
Lubricant (T-32)	1	55	North/Northwest	Compressor Building	Metal Drum	Concrete Containment (inside building)
Lubricant (Cetus ELITESYN NG 100)	1	300	North/Northwest	Compressor Building	Grounded Metal Tank	Steel Containment/Unlined
Lubricant (Summit PGS-150	2	150	North/Northwest	Compressor Building	Grounded Metal Tank	Plastic/HDPE Portable Containment
Chreat	1	2 000	North/Northwest	Glycol Skid	Grounded Metal Tank	Steel Containment/Unlined

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APPENDIX C

Emergency Action Plan

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Emergency Action Plan

North Hobbs Plant

Oxy Plants shall make reference to 29 CFR 1910.38 and will provide an Emergency Action Plan in accordance with 29 CFR 1910.38

Oxy Plants will evacuate their employees from the danger area when an emergency occurs, and will not permit any of their employees to assist in handling the emergency. Operations will muster, access the situation, perform preventive measures, and follow procedures to operate critical operations before they evacuate. In handling the emergency, the control room operator would activate the Emergency Shutdowns (ESD) if it can be done without delaying evacuation.

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PREFACE

An effective and viable Emergency Action Plan is intended to provide prior planning and guidance in responding to emergency incidents. The primary considerations in its development are personnel, public safety, protection of company and public property, and protection of the environment.

Although the plan addresses varied emergencies, which may occur, it recognizes that flexibility and the use of the organization's knowledge and experience is critical to safe resolution of emergency incidents. Response actions outlined in the plan provide a framework, which may be placed into operation without confusion. The actions will promote quick and decisive actions while protecting the safety of personnel and the public.

Every effort has been taken to minimize or eliminate all potentially hazardous situations and to avoid accidents due to equipment failure by the dedicated efforts of our people in maintaining a preventive maintenance program.

The Plant Team is responsible and accountable for the implementation, the evaluation, and the maintenance of this Emergency Action Plan in accordance with Occidental's safety guidelines.

The HSE Specialist is the program coordinator. He has overall responsibility for the plan and will review and update it as necessary.

COMPANY POLICY

Occidental Permian Ltd. pledges to protect the health and safety of our employees, our contractors, the users of our products and the communities in which we operate. We recognize the challenge of fulfilling this pledge while accomplishing our other corporate goals. Each of us shares this responsibility to ensure our long-term success. To achieve our goals, we will:

- Commit to leadership by operating and growing our business in compliance with all known legal requirements and Occidental's Safety, Health, Environmental and Regulatory operating guidelines.
- Safeguard our employees' health by promoting an accident free workplace, minimizing exposure to hazardous substances, and providing preventive health care systems.
- Promote safe handling, use and disposal of our products by acquiring and communicating information thus educating our employees and customers.
- Minimize the environmental impact of our operations by promoting pollution prevention and environmental conservation.
- Anticipate, evaluate and manage risks by maintaining crisis management programs that emphasize prevention and effective emergency preparedness, response and Removal plans.
- Commit to continuous improvement by monitoring compliance with regulations and our internal guidelines while striving for Safety performance, which compares favorably with industry leaders.
- Earn the public trust by communicating openly about our guidelines, programs and performance while advocating sound laws and regulations.

HOBBS EAP

In the event of a Gas Leak or Fire that threatens safety, Hobbs operations will activate the alarm and personnel will evacuate to the Mustering Area. Management and operations will evaluate events on a case-by-case basis to determine when a plant evacuation is appropriate.

All personnel will immediately report to the primary Mustering Area in red, just inside the main entrance, while operations and HSE will report to Control Room. The secondary Mustering Area in blue on the east road outside the plant may be used if the wind direction is toward the primary Mustering Area.

The First Occidental Employee to arrive at the Mustering Area will gather the sign-in sheets and begin accounting for all Personnel. After all personnel are accounted for, operations will be notified.

In the event that personnel have not gathered at the Mustering Area, Operations will be advised. Operations will use Safe Work Permits to identify individuals who are working in and attempt to locate and account for.

No one will return to work until the person in charge announces the "all clear".

Alternate mustering location in the event the primary location is not safe to remain.



EMERGENCY RESPONSE AND EVACUATION

ACTIVATION OF EMERGENCY ACTION PLAN

- A. Upon notification or discovery by <u>anyone</u> of a potential emergency:
 - 1. Evaluation and notification should be made via the plant warning system.
 - 2. Initiate the Emergency Action Plan.
 - 3. Initiate Rescue and First Aid as the situation dictates.
- B. The person at the site will notify the Control Room Operator, or Caprock Answering Service, who will notify the first responder. The First Responders are listed in order on the Occidental Emergency Poster included in the plant EAP, Appendix A.
 - 1. The Plant Incident Coordinator will be responsible for the delegation of assignments relative to notifying all company, contract, and emergency response personnel.
 - 2. The Plant Incident Coordinator will notify and also coordinate deployment of emergency equipment and any additional manpower as the situation dictates.
 - 3. The Plant Incident Coordinator, or relief, remains on site until the emergency is over. The Plant Incident Coordinator ensures repairs have been completed and ensures the operation has returned to normal, before releasing emergency team members.

PERSONNEL RESPONSIBILITIES

- A. Company Team Member will be responsible for:
 - 1. Notifying responsible party of incident location.
 - 2. Will evacuate to designated mustering area, utilizing escape units if necessary, where they will be accounted for from the sign-in sheet. Escape units are stationed throughout the North Hobbs Plant.
 - 3. Containment, notification, and repair of hazardous conditions as assigned by Plant Incident Coordinator and only those tasks they have been trained to perform. **Responding emergency personnel must initiate the "buddy system" prior to entering the affected area. No one enters a live area without a backup person equipped with the proper PPE.**
 - 4. Assisting civil authorities as requested by Plant Incident Coordinator.
 - 5. Coordinating with civil authorities, and the use of other expertise as needed relative to hazards.
- B. **Contract Personnel** will immediately evacuate to the designated mustering area using escape units if necessary, where they will be accounted for from the sign-in sheet. Escape units are stationed throughout the North Hobbs Plant. Contractors will remain in the area to assist Occidental team members and civil authorities as requested but only when it is safe to do so and when adequate training has been provided.
- C. Civil Authorities (Law Enforcement, Fire, and OEMs) will be responsible for:
 - 1. Establishing membership in a Unified Command structure hosted by the Occidental Plant Incident Coordinator.
 - 2. As directed by the Plant Incident Coordinator and the Unified Command, control site access by highway and air, re-route traffic outside vicinity of area, and provide escort services for response personnel into the area.

- 3. Perform all fire and vapor release control activities in coordination with the Unified Command.
- 4. Initiate public evacuation plans as instructed by the Unit Plant Coordinator.
- 5. Perform rescue or Removal activities with coordination from the Unified Command.
- 6. Provide medical assistance as dictated by the situation at hand.

EMERGENCY RESPONSE ACTIONS

The following is a description of key personnel responsibilities for incident response.

NOTE: Any employee on Duty has the discretionary authority to initiate a shutdown of the plant if assessment of the situation indicates an immediate shutdown is necessary.

PLANT INCIDENT COORDINATOR: (CENTRAL PLT. MANAGER UNLESS OTHERWISE APPOINTED)

Plant Incident Coordinator (PIC) will be responsible for all direct contact with the news media and for all other documentation. Primary responsibility is to notify or delegate notifications of all Occidental and contract personnel as well as the civil authorities needed for emergency response to the situation. Additionally, the PIC will direct the actions of all team members on-site and initiate an evacuation as necessary to the designated mustering point. The PIC will determine when an emergency is considered over and operations have returned to normal. The PIC will take a leadership role in establishing a Unified Command with civil authorities, local responders, and community response officials.

PLANT INCIDENT COORDINATOR ASSISTANT

The PIC Assistant, to be named by the Plant Incident Coordinator at the time of the emergency, will assist and relieve the PIC in any emergency action responsibilities as directed. The PIC Assistant will help coordinate tactical decisions with the PIC relative to resolving the incident, and will specialize in field activities surrounding operations, local planning, immediate logistics, and establishing safe operations for the community.

OTHER EMPLOYEES:

All non-emergency personnel should proceed to the mustering area and wait for instructions from the PIC. Note: All outside operators will report to the control room as their mustering area.

NOTE: The primary mustering area is in the parking lot along the west road to the plant. If for some reason this area is not deemed a safe mustering area, all other employees will be notified to muster at the secondary point, along the east road outside the plant.

HSE REPRESENTATIVES:

The local HSE representative's primary responsibility is to notify the appropriate regulatory agencies whenever environmental concerns and regulations dictate. Additionally, HSE representatives are responsible to provide clean-up directions, requirements for spill remediation, and disposal guidelines.

The HSE Representatives are also responsible for assessing the hazards of the situation, advising the PIC of those hazards and appropriate responses, and ensuring the safety of the response personnel. HSE representatives should coordinate all required regulatory agency and Houston Office notification in the event of serious injury or death. They should assist in acquiring and deploying the appropriate personal protective equipment as needed. After returning to normal operations, they should analyze the outcome of the situation and coordinate the investigation and post-appraisal of the incident. HSE personnel will take the lead in helping the Unified Command establish "hot" and "clean" zones as dictated by the incident. HSE Specialist should perform all other duties as requested by the PIC or HSE Manager.

COMMAND CENTER

The location of the Emergency Command Center will be contingent on the incident. The Command Center, at the discretion of the Plant Incident Coordinator (PIC), could be located in the office building, or it could be mobile.

In the event that the incident permits the use of the Control Room, the conference room in the Control Room will be the Command Center during emergencies. This location was chosen because there is access to multiple phone lines, computer hook-ups, a fax machine and information resources. The building is equipped as follows:

1. Each phone line extension has direct intercompany and outside line capabilities. These lines **would be operable** if there were an electrical power loss because they are on the UPS.

2. The plant radios **would be operable** if there were a power loss because the repeater is on the UPS.

- 3. Office supplies and forms are available in office supply rooms.
- 4. Computers are available but are inoperable during a power loss.

In the event the plant office had to be evacuated and a mobile Emergency Command Center is set up, all communications with civil authorities would be conducted via mobile phone. Civil authority personnel will report to the mobile Command Center for further instructions.

Communications with Occidental Team Members or locations will be conducted with mobile phones, or plant radios.

LOCAL EMERGENCY MEDICAL SERVICE

In the event any injuries were to occur at the North Hobbs Unit Plant, Hobbs Fire Department would be notified. The number of response teams required would depend on the number and the extent of injures. EMS personnel are highly trained and it is their responsibility to ensure proper treatment is giving to each injured person. In case of multi injuries, the Hobbs Fire Department will determine the order in which individuals are treated/transported.

EMERGENCY TELEPHONE LIST

GOVERNMENT AGENCIES

New Mexico Oil Conservation Division	575-241-7063
Bureau of Land Management	575-393-3612
Air Quality Bureau, Santa Fe, NM	575-827-1494
LEPC – Lorenzo Velasquez Lea Co. Emergency M	gmt. Director 575-397-8607 (O) 575-399-3439 (C)
OCCUPATIONAL SAFETY AND HEALTH	

ADMINISTRATION (OSHA) LUBBOCK, TEXAS

806-472-7681

OUTSIDE SUPPORT PHONE NUMBERS

MEDICAL:

HOSPITAL	ADDRESS	CITY	TELEPHONE
Lea Regional Hospital	5419 Lovington Highway	Hobbs, NM	575-492-5000
Seminole Memorial Hospital	209 NW 8 th Street	Seminole, Texas	432-758-5811
Permian General Hospital	702 Hospital Drive	Andrews, Texas	432-523-2200
University Medical Center	602 Indiana	Lubbock, Texas	806-775-8200
Yoakum County Hospital	412 Mustang Dr.	Denver City, TX	806-592-5484

AMBULANCE	9 - 911
Hobbs, NM	911 or 575-397-9308
Seminole, TX	911 or 432-758-8816
Lovington, NM	911 or 575-396-2811
Eunice, NM	911
Denver City, TX	911 or 806-592-3516

POISON CONTROL CENTER	1-800-222-1212
LAW ENFORCEMENT:

POLICE		
575-397-2677	Hobbs	9-911
432-758-9871	Seminole	9-911
575-394-2112	Eunice	9-911
575-396-3611	Lovington	9-911
806-592-3516	Denver City	9-911

SHERIFF		
432-758-4023	Gaines County	9-911
575-393-2677	Lea County	9-911
575-396-3611	Lovington	9-911

STATE HIGHWAY PATROL		
575-392-5588	NM State Police	9-911

FIRE DEPARTMENT		
575-397-2677	Hobbs	9-911
911	Lovington	9-911
806-592-3516	Denver City	9-911
432-758-9871	Seminole	9-911

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ADDITIONAL:

CHEMTREC	1-800-424-9300
Call CHEMTREC for questions concerning emergency response or chemical hazards in the event of a chemical spill.	

AIRPORTS	
Lea County Airport – Carlsbad Hwy	575-393-4943
Lea County – Lovington Airport	575-396-9911
Lubbock International Airport	806-762-6411
Midland International Airport	432-563-2033
Gaines County Airport	432-758-5411
Aerocare Helicopter	1-800-627-2376

EMERGENCY PHONE NUMBER - COMPANY PERSONNEL - FAX 423-758-8609

Name	Title	Residence Phone	Office Phone	Cellular or Phone patch or Pager
Chris Poe	Central Plt. TL		432-758-8640	806-215-2749 (C)
Jim Richardson	Permian Plant Manager		806-229-9727	806-781-6450 (C)
Mario Guerrero	Permian Prod. Leader		806-229-9740	806-781-1267 (C)
Jason Cary	HSE Advisor Ops		432-758-8608	806-620-5501 (C)
Richard Alvarado	HSE Specialist		432-758-8621	432-209-2659 (C)
Kyle Cain	HSE Team Lead		806-229-9858	(806) 401-5476 (C)
Tom Janiszewski	Chief Counsel		713-366-5529	713-560-8049
Merritt Talbott	Permian Basin Comm. Manager		713-552-8676	512-964-4718 (C)

ENGINEERING SUPPORT

Name	Title	Office Phone	Home	Cellular
Greg Hartmann	Engineer			432-209-3897

CORPORATE SECURITY

Name	Title	Telephone	Fax	Cellular
Frank Munoz	Security	713-215-7157	713-985-4977	713-829-5753
	Cocally			
Alternate				
Jerry Byrne	Security	432-685-5740		432-813-1807
berry Byrne	ocounty	402 000 01 40		402 010 1007

INCIDENT CLASSIFICATION

DEFINITION, NOTIFICATION, AND REPORTING REQUIREMENTS:

Occidental recognizes three levels of incidents, which are defined below.

- 1) **Major:** Any incident that involves Occidental employee, contractor or public fatalities, probable permanent disabilities, and/or multiple <u>serious</u> injuries (three or more hospitalizations) along with any other events that could become corporate public affairs issues (regardless of personal injury).
- 2) **Significant:** Any incident that satisfies one or more of the following:
 - Potential public affairs issues,
 - Blatant unsafe acts have occurred,
 - Disregard for company policy is apparent (i.e. PPE, etc.),
 - Substance abuse may be involved,
 - Potential for serious injury existed or occurred (less than 3),
 - Potential for litigation exists,
 - Extensive property damage occurred,
 - Potential to cause an OSHA recordable injury/illness exists.
- 3) **Other:** Any incident not covered by either of the above classifications.

Notification and Reporting Requirements

Major Incident:

The following steps outline the notification expectations for incidents classified as major incidents. The Field Incident Coordinator will ensure the appropriate notification has taken place. Immediate is defined as the earliest practical time once the incident has been brought under control or is being managed by someone other than the individual conducting the notification process. (Do not risk additional personal injury, increased public exposure or compound property damage by attempting to notify while still responding to a Major incident.)

- 1) Immediate notification by fax or phone to the FMT Manager,
- 2) Immediate notification by fax or phone to the HSE Tech,
- 3) Immediate notification by fax or phone to the area HSE Specialist,
- 4) Immediate notification by fax or phone to the HSE Manager.
- 5) An Incident Report Form 1 (IRF1) will be initiated and forwarded within 24 hours to the following:
 - The FMT Manager,
 - The area HSE Tech,
 - The area HSE Specialist,
 - The HSE Database Coordinator.

6) A state workman's compensation form will be completed by the area HSE Tech and forwarded to the Occidental workman's compensation organization.

7) An investigation team will be appointed and initiated within 24 hours of the incident. Distribution of the resulting incident investigation report will be the same as the distribution of the IRF1.
The USE Detailed and Coordinates will enter the report into the detailed and the detail and the detailed and the detail

The HSE Database Coordinator will enter the report into the database after the HSE Manager or his designee has reviewed it. If the Team Leader determines potential litigation is a factor, he should contact the HSE Manager or his designee prior to appointing the investigation team.

Note: It is the responsibility of the HSE Specialist, the HSE Manager, or his designee to determine if regulatory notifications are required and to ensure they are completed concerning injury and illness reporting.

Serious Incident

The following steps identify the notification requirements for serious incidents. If there is a question as to whether an incident should be classified as Major or Serious, please follow the notification guidance provided for Major incidents. The following notifications should include some details about the incident including but not limited to Who, What, When, and the current situation or diagnosis. Electronic notification by Email or fax is acceptable provided confirmation of receipt is achieved.

- 1) Notification within two hours to the FMT Manager,
- 2) Notification within two hours to the HSE Tech,
- 3) Notification within two hours to the area HSE Specialist.
- 4) An Incident Report Form 1 (IRF1) will be initiated and forwarded within 24 hours to the following:
 - The Central Plt. Manager,
 - The area HSE Tech,
 - The area HSE Specialist,
 - The HSE Database Coordinator.
- 5) A state workman's compensation form will be completed by the area HSE Tech and forwarded to the Occidental workman's compensation organization.
- 6) An investigation team will be appointed and initiated within 24 hours of the incident. Distribution of the resulting incident investigation report will be the same as the distribution of the IRF1.

The HSE Database Coordinator will enter the report into the database after the HSE Manager or his designee has reviewed it. If the Plt Manager determines potential litigation is a factor, he should contact the HSE Manager or his designee prior to appointing the investigation team.

Other Incidents

Notification requirements will be achieved through the APO reporting system or the Incident Report Form 1 (IRF1). The (IRF1) will be completed and forwarded to the Iocal Central Plt. Manager, the OTL Leader, the HSE Tech and the HSE System Coordinator. The HSE System Coordinator will input the incident information into the electronic incident database.

TYPES OF EMERGENCIES AND RESPONSE ACTIONS

Emergency responses have been developed for each of the following situations. It should be understood that this list is not all-inclusive, but the overall plan will assist in addressing similar incidents:

FIRES OR EXPLOSIONS:

A. Fire Fighting Philosophy

It is the intent of Occidental Permian LTD Employees will fight fires only in their "incipient" stage of fire fighting, utilizing hand held fire extinguishers. Fixed monitors will be used for cooling or protecting exposures if necessary. All Team Members will be given annual training in the use of equipment available for incipient stage fire fighting. The equipment is inspected and tested per 29 CFR 1910.158.

Any Occidental employee who helps to coordinate fire department responses must be utilizing appropriate Personal Protective Equipment (PPE) as specified by either the Field Incident Coordinator or the Unified Command.

The responding fire department will have primacy when they have received a call from an Occidental representative requesting assistance in controlling a fire on any Occidental property. Their actions, coordinated with the Field Incident Coordinator or the Unified Command, will be to contain and extinguish the fire.

B. Emergency Communications

A fire or explosion that cannot be immediately extinguished, or a potentially large fire hazard, should be communicated by activating the Plant Alarm System. The plant alarm system will be used to alert employees and pinpoint the nature and area of the fire.

The control room operator manually activates the plant phone system fire alarm. The fire alarm is a continuous series of short blasts on the plant phone system.

The alarm sounds until manually reset under authority of the Field Incident Coordinator.

** Radio priority is then given to individuals directly involved with the incident.

C. Emergency Response Action

The first priority of each Occidental employee and contractor in a major fire situation is to determine the location and condition of personnel. If it is apparent that any personnel are missing or injured, a preliminary search and rescue should be initiated by the Field Incident Coordinator. However, employees who have not been specifically trained to do so must never re-enter a hazardous area or "hot zone". These types of rescues or recoveries are the responsibility of the responding civil authorities and municipal support agencies.

D. Normal Working Hours

The individual who discovers a fire must make a decision whether to attempt to fight the fire or call for help. Sound the fire signal on the Plant Alarm System the location, state the location, and repeat the nature of the fire several times. Upon hearing the signal, all employees should report to the mustering area to be accounted for and assigned duties. The Field Incident Coordinator will be responsible for assigning duties including calling the fire department, the appropriate employees, regulatory agencies, and authorizing entry to the plant.

E. Night Shifts, Weekends, Holidays

During these abnormal operating hours, there is a minimal amount of personnel on site. Therefore, implement the following procedures. As always, the primary consideration is given to the safety of all individuals and care for the injured. After controlling an incipient stage fire, notify the Team Leader. If the fire is not manageable, the individual encountering the fire should call the fire department and request assistance. The individual then calls the Team Leader or one of the Management Members listed on the Emergency Telephone List. All personnel should evacuate the plant and initiate an emergency shut down, if deemed necessary. Permission to re-enter the plant is given only by the Team Leader. If possible, employees should operate the valves necessary to shut in or divert gas to flare as they exit the plant but only if they can do so without incurring undue risks.

F. Responsibilities

Plant Manager:

Responsible for overall plant protection.

Operations Team Leader:

Responsible for equipment being in its proper location, the team conducts appropriate drills, and ensures maintenance of equipment occurs as scheduled. The Team Leader / Field Incident Coordinator is responsible for coordinating immediate control of the incident and determining that the conditions are back too normal.

H. Fire Fighting Equipment

The locations of the portable fire extinguishers are placed throughout the plant at strategic and accessible points.

PERSONAL INJURY OR DEATH

After making a call for assistance, prompt and appropriate medical treatment for the victim should be administered. This is the responsibility of all trained individuals. Treatment of injured persons to be concentrated toward life threatening conditions such as Airway Obstructions, Breathing, Circulation and Spinal (A, B, C'S) injured persons. The AED and First Aid Kit is located in the Control Room and is to be used upon medical emergencies as needed.

Do not move the victim unless they are in a hazardous environment or situation that is in imminent danger to the victim or responders. An ambulance should be summoned for any injury that appears to be serious.

SPILLS

A. Oil and Produced Water Spills

In the event of an oil or produced water spill, the individual should immediately notify the appropriate Team Leader in charge. This individual should assess the situation and safely stop the source of the spill, if possible. "Safely" is defined as an area identified as non-hazardous from a toxic or IDLH, immediately dangerous to life or health, concentration. If unknown, all incident scenes must be treated as IDLH. The PIC in charge should proceed to the spill site to direct control and containment activities. They should assess the need for additional assistance and equipment. After assessing the spill site, the PIC should immediately contact the HSE Tech, who will then contact the HSE Specialist.

B. Chemical Spills

In the event of a chemical spill, the individual discovering the spill should contact the appropriate Team Leader. The individual discovering the release should not attempt any identification, control, or containment without the proper personal protective equipment. Upon proper identification of the chemical, the Team Leader / PIC should contact a local HSE Tech, other HSE staff; consult the Material Safety Data Sheet, or the DOT Response Guidebook for hazardous characteristics and proper handling procedures.

Chemtrec (800-424-9300) may be contacted with any questions concerning appropriate responses or chemical hazards.

After proper handling procedures have been identified, control and containment should begin. If the incident is to be regulated by HAZWOPER guidelines. If HAZWOPER applies, the Field Incident Coordinator must direct all site activities. If HAZWOPER does not apply, the PIC in charge should proceed to the spill site and direct control and containment activities. In addition, the PIC should determine the need for additional assistance and equipment. Upon assessment, the PIC should immediately contact the PMT Manager and the HSE Tech.

*** Specific handling procedures have been identified for some of the more hazardous materials and releases as outlined in the table of contents of this document.

*** Same procedure applies to small spills or releases.

BOMB THREAT

In the event of a bomb threat, the individual receiving the call, on or off site, should try to get as much information as possible from the caller (Appendix H). The individual receiving the call should immediately contact the Team Leader / Field Incident Coordinator in charge. Evacuation of the plant should be considered at this time. Roadblocks may need to be set up at the plant entrances and road intersections as deemed necessary. The Field Incident Coordinator in charge should make all appropriate contacts.

The Plant Incident Coordinator should:

- 1. Realize that every bomb threat is serious.
- 2. Notify Corporate Security and follow the directions given.
- 3. Inform Police/Sheriff's Department.
- 4. Inform Fire Department.
- 5. Contact the Houston Hotline for technical assistance and communication support.

6. Organize search efforts with the assistance of the local law enforcement agencies. If a bomb is actually located or a bombing does occur the Alcohol, Tobacco & Firearms Commission should be notified. They are qualified to respond to an emergency of this nature.

The Field Incident Coordinator should notify Public and Governmental Affairs Department and the area Operation Vice-President. The Plant Incident Coordinator will work with the media and initiate documentation efforts.

"NON-OCCIDENTAL" EMERGENCIES

It is possible that an Occidental employee could discover a potentially hazardous leak from a pipeline or other facility not operated by Occidental. In addition, leaks could be reported to Occidental but upon investigation, turn out to be from someone else's facility. In such instances, the Occidental employee(s) involved should lend assistance without unduly endangering themselves. Generally, such assistance would include the following actions:

- 1. Alert and/or assist any persons apparently in immediate danger without entering a toxic or IDLH atmosphere.
- 2. Notify the appropriate civil authorities of the location and nature of the emergency and assist as requested.
- 3. Notify the operator of the facility, if identity can be determined. Telephone numbers of other operations are listed below and in the emergency telephone list included in this manual.

	Day	Night
XTO Energy	877-311-1007	877-311-1007
Apache	806-732-2925	1-888-257-6840

NATURAL DISASTERS

TORNADOES

If a tornado is sighted, the individual sighting the tornado should notify other persons in the area by radio contact. If the individual has had "spotter" training through the National Weather Service, contact with the County Sheriff's Office should be made to report funnel clouds or tornadoes. Employees should seek cover in a low-lying area away from power lines (i.e. ditch or culvert). Office employees should seek cover in an internal room with no windows. During nights and weekends, employees should muster together if time permits. After the tornado has passed, the Team Leader in charge shall coordinate accounting of all employees, evaluate damage assessments and make appropriate notifications. The Emergency Action Plan will remain in effect until operations return to normal.

EARTHQUAKES

If an earthquake occurs, the Emergency Action Plan will be activated using the best available means. After accounting for all employees, the situation should be evaluated for damage and the appropriate portions of the Emergency Action Plan should be initiated. The Emergency Action Plan will remain in effect until the PIC has determined the emergency is over and operations are returned to normal.

SAFE OPERATING PROCEDURES FOR IDENTIFIED HIGHLY HAZARDOUS MATERIALS IN OCCIDENTAL OPERATIONS

SULFURIC ACID SPILL

- 1. Notify all employees via radio or Plant Phone and advise them of the leak. Keep unnecessary personnel out of spill area.
- 2. Isolate the hazard area and deny entry to personnel.
- 3. Stay upwind, out of low areas, and ventilate enclosed areas before entering.
- 4. All Team Members within the spill area must wear positive pressure SCBA and chemical protective clothing.
- 5. Barricade the area for at least 150 feet in all directions and dike the spill area.
- 6. Confirm the source of the spill by visual observations and/or by pH test.
- 7. Neutralize the spill.
- *** On leaks, slowly add soda ash or lime.
 - a. Take pH samples periodically to confirm neutralization of the acid.
 - b. Once spill is neutralized, transfer liquid into the water disposal tank for disposal.
 - c. Till up the ground, it the leak was outside, to prevent any residue from becoming airborne.
 - d. DO NOT put water directly on the spill area!
 - e. Contact the HSE Tech for proper disposal of materials.

SODIUM HYDROXIDE OR POTASSIUM HYDROXIDE SPILL

- 1. Notify all Team Members via radio or Plant Phone and advise them of the leak. Keep unnecessary personnel out of spill area.
- 2. Isolate the hazard area and deny entry to personnel.
- 3. Stay upwind, and ventilate enclosed areas before entering.
- 4. SCBA protection is not required when dust, mist, and spray are not present. However, impervious protective clothing and chemically resistant boots and gloves, along with safety goggles and a full-face shield must be worn.
- 5. Barricade the area for at least 150 feet in all directions and dike the spill area.
- 6. Confirm the source of the spill by visual observation and/or pH test.
- 7. Neutralize the spill.

On leaks, neutralize by slowly adding sulfuric acid while stirring constantly.

- a. Take pH samples periodically to confirm neutralization of the caustic.
- b. Once the spill is neutralized, transfer liquid into the water disposal tank for disposal.
- c. Till up the ground, if the leak was outside, adding sodium bicarbonate to prevent any residue from becoming airborne.

d. DO NOT put water directly on the spill area unless it is added very slowly while being stirred! UPDATED: 01/2021 24

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e. Contact the HSE Tech for proper disposal of materials.

HYDROCARBON VAPOR CLOUD RELEASE

Upon discovery of a Hydrocarbon Vapor Cloud (OCCIDENTAL) release, take immediate safety precautions to protect any personnel who might be in the area.

The following guidelines should be followed:

- 1. Determine wind direction.
- 2. Do not approach a vapor cloud from the downwind direction. Do not drive or walk into the vapor cloud.
- 3. Evacuate everyone for one mile in each direction and two miles in the downwind direction.
- 4. Barricade area of exposure.
- 5. Provide medical assistance if necessary for any victims.
- 6. Contact civil authorities and advise of potential hazards of the situation and request their assistance if deemed necessary.
- 7. Contact hospital to alert their staff for possible injuries, and allow them the opportunity to initiate their Emergency Action Plan.
- 8. Eliminate all sources of ignition, which you have safe access to. (Sources such as engines, electric motors, pilot lights, smoking materials, even a dome light in your vehicle can be a source of ignition.)
- 9. Maintain contact with Field and/or Pipeline Team Members.
- 10. Do not attempt to extinguish any fires at the source of the release. Control of the vapor release can be maintained as long as there is a flame. An explosion could result if the fire is extinguished.
- 11. If the engine of your vehicle stops unexpectedly, do not attempt to start it until you are certain it did not stop due to lack of oxygen.

COMBUSTIBLE GAS RELEASE

(UNKNOWN CAUSE/PORTABLE MONITOR DETECTION)

- 1. The control room operator notifies plant personnel via the plant phone and/or radio of the location of leak or leak detection based on the available information.
- 2. Personnel evacuate the affected area.
- 3. All available individuals should meet in a centralized location. (Either the control room or in an area designated by the Team Leader.)
- 4. The Initial Response Team (IRT) assembles and is sent into the area to identify and assess the problem with radio communications ONLY under the following conditions:
 - a. No more than one monitor is alarming at 10% LEL or less.
 - b. The monitor has been in the Alarm State for less than 15 minutes.
 - c. The LEL percentage is stable and not climbing at a steady rate.
- 5. If any one of the above conditions is exceeded, no individual will enter the area around the monitor that is alarming which may pose an IDLH atmosphere.
- 6. Any ignition source equipment in close proximity to the alarming monitor will be shut down remotely if possible.
- ** NOTE ** If the LEL percentage does not drop below 10% after the area is allowed to ventilate, a decision by the Central Plt. Manager, Operation Team Leader (OTL), or PIC will be made as to how the leak will be isolated.
- 7. All personnel who enter an area with a monitor alarming at less than 10% LEL will be wearing fire retardant clothing and SCBA.
- 8. Personnel will also carry portable combustible gas, oxygen, and H₂S monitors with them into the area.
- 9. All other personnel will remain on standby awaiting further instructions regarding operations or logistics.
- 10. The Team Leader/OTL should be the coordinator of Team Members, logistics (SCBA, tools, etc.) and operations strategy unless relieved by the FIC.
- 11. Appropriate action will be taken based on the IRT assessment.
- 12. A post-incident review will be conducted immediately following the situation and discussed among all personnel with a follow-up note sent out to all Team Members via computer communication.

Hobbs FIRE/EVAC ALARM SYSTEM

Main Control Room

- 1) Control room operator will initiate fire/evacuation alarm
- 2) Control room operator will announce location of fire after first responder reports
- 3) Control room operator will contact Team Leader

Portable (Hand) Radios

- 1) Control room operator will announce fire/evac system is in effect
- 2) Control room operator will update all personnel as events develop

HELICOPTER LANDING

North Hobbs Unit RCF

LATITUDE 32° 43' 45.74 N "Helicopter flights will land at the Lea County Hospital"

LONGITUDE 103° 39' 11.20 W

EMERGENCY ACTION PLAN TRAINING

The plant management and HSE Tech will be responsible for updating and reviewing this plan, with all employees annually. They will also be responsible for retraining all employees concerning any significant plan changes.

New employees and employees recently assigned to the operations center must receive training on the Emergency Action Plan within the first week of assignment. Contract employees who routinely enter work sites will receive a briefing explaining their responsibilities in an emergency.

All employees will be trained in the following areas necessary for proper execution of the emergency responses for which this plan is designed:

- 1. Dry chemical fire extinguisher use (annual)
- 2. Respiratory protection/use of self-contained breathing apparatus (annual)
- 3. Use of portable gas detection equipment (annual)
- 4. Proper use of personal protective equipment (ongoing)
- 5. Initial eight hour First Aid/CPR Course (with refresher training every two years)
- 6. Hazard Communication/Chemical Safety Review (annual)
- 7. Lockout/Tagout/Confined Space Entry & Hot Work Permit Requirement (annual)

The following drills will be conducted when deemed necessary by Team Leader:

- 1. Fire and Explosion
- 2. Hydrocarbon Gas Release
- 3. Bomb Threat
- 4. Spill Response
- 5. Man down/Rescue and Medical Emergency

**All personnel document Training with sign-off in attendance.

PUBLIC RELATIONS

Occidental recognizes that the news media have a legitimate interest in incidents at Occidental facilities, which could affect the public. It is to the company's benefit to cooperate with the news media when incidents occur because these media are our best liaison with the public.

Our objective is to see that all reports of any emergency are factual and represent the company's position fairly and accurately. Cooperation with news media representatives is the most reliable guarantee that this objective will be met.

All Team Members are instructed to <u>NOT</u> make any statement to the media concerning the emergency incident. If a media representative contacts any employee, they should refer them to the designated Emergency Command Center where they should contact the Plant Manager, Field Incident Coordinator, or his designated relief for any information concerning the incident.

APPENDICES:

APPENDIX A: Qualified Personnel – North Hobbs Unit RCF

Occidental Permian EOR Emergency Telephone List			
Serious Injury of Il	lness	Hobbs Plants	
FROM AN OFFICE PHONE DIAL (9) 911			
Ambulance - 911	911 or (575) 393-26	77 If 911 fails on cell	
AXIOM 1-877-502-9466			
HELICOPTER: AERO CARE: (800) 627-2376 Lubboo	k, TX.	

Hospitals:

Lea Regional Hospital	(575) 492-5000	5419 Lovington Highway	Hobbs, NM
Memorial Hospital	(432) 758-5811	209 NW 8 th	Seminole, TX
Nor-Lea General Hospital	(575) 396-6611	1600 N. Main Street	Lovington, NM
Yoakum County Hospital	(806) 592-2121	412 Mustang Ave.	Denver City, TX
Brownfield Medical Center	(806) 637-3551	705 E. Felt	Brownfield, TX
Covenant Hospital	(806) 725-1011	3615 19 th Street	Lubbock, TX

Poison Control Hotline: 1-800-POISON-1 (1-800-764-7661) or call: 911

CHEMTREC: 1-800-424-9300 Chemical Emergencies

New Mexico Law Enforcement: In case of an emergency call: 911

Hobbs Police Department	(575) 397-9265
Lea County Sheriff Hobbs Office	(575) 393-2515
Lea County Sheriff Lovington Office	(575) 396-3611
NM State Police	(575) 392-5588

Texas Law Enforcement: In case of an emergency call: 911

Denver City Police	(806) 592-3516	Terry County Sheriff	(806) 637-2212
Yoakum County Sheriff	(806) 456-2377	Lubbock County Sheriff	(806) 747-4491
Gaines County Sheriff Seminole Office	(432) 758-4023		
Texas DPS	(806) 637-2312		

Emergency Phone Number – Company Personnel

Name	Title	Home Phone	Office Phone	Cell or Pager #
Jim Richardson	EOR Plant Manager	806-781-6450	806-592-7301	806-781-6450 (C)
Mario Guerrero	Manager Plant Operations	806-781-1267	432-758-8640	806-781-1267 (C)
Chris Poe	Plant Team Lead	806-215-2749	432-758-8640	806-215-2749 (C)

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Ricky Sanders	Operations Team Lead	806-893-2233	575-391-4731	806-893-2233 (C)
Jason Cary	HES Advisor Ops	806-620-5501	432-758-8608	806-620-5501 (C)
Richard Alvarado	HES Specialist	432-209-2659	432-758-8621	432-209-2659 (C)

Updated: 04/17/2023

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APPENDIX B: Qualified Personnel – North Hobbs Unit RCF

QUALIFIED PERSONNEL

EMERGENCY PHONE NUMBER - COMPANY PERSONNEL

North Hobbs Unit RCF

FAX No. 432-758-8609

Name	Title	Residence Phone	Office Phone	Cellular
Chris Poe	Central Plt. TL		432-758-8640	806-215-2749 (C)
Richard Sanders	Operations Team Lead		575-391-4731	806-893-2233 (C)
Mario Guerrero	Permian Prod. Leader		806-229-9740	806-781-1267 (C)
Jason Cary	HSE Advisor	806-620-5501	432-758-6808	806-620-5501 (C)
Jim Richardson	Permian Plant Manager		806-229-9727	806-781-6450 (C)
Richard Alvarado	HSE Specialist		432-758-8621	432-209-2659 (C)

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Incident Coordinator Trained Personnel:

Name	Title	Residence Phone	Office Phone	Cellular
Jim Richardson	Permian Plant Manager		806-229-9727	806-781-6450 (C)
Chris Poe	Central Plt. TL		432-758-8640	806-215-2749 (C)
Todd King	Measurement Specialist	806-592-9467	806-592-6274	806-215-0183 (C)
Mario Guerrero	Permian Prod. Leader		806-229-9740	806-781-1267 (C)
Jason Cary	HSE Advisor	806-620-5501	432-758-6808	806-620-5501 (C)
Richard Sanders	Operations Team Lead		575-391-4731	806-893-2233 (C)
Richard Alvarado	HSE Specialist		432-758-8621	432-209-2659 (C)

APPENDIX C: AREA RESIDENCE OR BUSINESS NAMES AND PHONE NUMBERS PLACE HOLDER

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APPENDIX D: Area Contractor Contact Numbers

CONTRACTOR SUPPORT

NAME	PHONE NUMBERS
Custom Submersibles	575-397-0271 24 HOUR 575-393-2146
Dixie Electric – Hobbs, NM	575-939-4466 24 HOUR
K & S Electric – Hobbs, NM	575-393-3114 24 HOUR
Water Service and Vacuum Trucks	
Key Energy Services – Hobbs, NM	575-397-4994 24 HOUR
Maclaskey Oil Field Services Hobbs, NM	575-393-1016 24 HOUR
Roustabout Crews	
Key Energy Services – Hobbs, NM	575-391-7725 24 HOUR
Banta Oilfield Services – Hobbs, NM	575-393-3875 24 HOUR
Dirt Work Equipment	
Key Energy Services – Hobbs, NM	575-391-7725 24 HOUR
B & H Construction – Eunice, NM	575-394-2588 24 HOUR
Welders	
Custom Welding – Hobbs, NM	575-393-5904 24 HOUR
Safety Equipment	
Total Safety – Hobbs, NM	575-392-2973 24 HOUR
CO2 SUPPLY	
Trinity Pipeline	432-297-1004 24 HOUR
Lan Briley	432-661-0162
Billy Trull	432-661-1412

APPENDIX E: Carbon Dioxide (CO2) Gas Release

EMERGENCY ACTION PLAN:

This plan covers Occidental Permian LTD operations involving Gas Plants and their associated gathering systems.

The purpose of this plan is to provide for the logical, efficient and safe action required by Occidental to protect the public and our personnel in the event of an accidental release of a potentially hazardous quantity of Carbon Dioxide Gas (CO2).

A potentially hazardous volume of CO2 is defined as one which could result in a ground level concentration of 5000 PPM or higher where people are known or expected to be. A concentration of 50,000 PPM of CO2 is considered Immediately Dangerous to Life or Health (IDLH).

EMERGENCY INCIDENT

1. Initial Leak Detection

From a safe distance, notify your immediate Team Leader or the Team Leader in charge of your work location via the radio or plant phone system. Advise the Team Leader of the location and nature of the emergency and the actions you can and will proceed to take. Activate the Emergency Action Plan if warranted. If you are capable and trained to do so, rescue any downed victims using SCBA. However, do not enter an IDLH atmosphere without the proper PPE and suppression equipment in place. Remove the victim to an uncontaminated area, administer ABC's/CPR as needed and call a physician immediately.

2. Alert and/or evacuate people within the potentially hazardous area.

Alert people within the exposure area. In the event a leak causes a potentially hazardous area on a public road, notification must be done by personal contact. It must be done immediately by the Occidental employee who discovers or arrives first at the leak site if judged serious enough to require prompt evacuation; otherwise, the Plant Incident Coordinator in charge shall assign this notification task. In the event of a leak that creates a potentially hazardous area, the notifications shall be handled by the PIC in charge, or by designee, and shall be made by telephone and/or personal contact, whichever would yield the fastest notifications under the circumstances. If evacuation is deemed prudent, advise the public and/or assist them in leaving the area immediately, by the fastest route out of the exposure area. The required company and contract personnel and civil authorities will be notified to aid in bringing the situation under control and end the emergency.

3. Cordon off the exposure area to prevent entry.

Place barricades and/or warning signs at all routes into the exposure area to keep people away. If possible, have these barricades manned. Persons staffing the barricades must be equipped with carbon dioxide measuring devices or personnel monitors and two-way radios.

4. Stop the escape of Carbon Dioxide (CO2).

If trained to do so, plug the leak or shut off the sources of gas to the rupture. In some cases, clamps can probably be used for temporarily stopping smaller leaks. For the leaks either too large or inconveniently located to stop by clamping, contact Gas Gathering Team Members immediately. The PMT Manager and Gas Gathering Team Leader as to how to isolate the leak will make a joint decision.

5. Complete notifications as required.

- a. Contact the appropriate civil authorities for their assistance.
- b. Contact hospital and advise them of the situation in order for them to activate their Emergency Action Plan, as necessary.

6. Return the situation to normal.

As soon as the complete and permanent stopping of the gas escape is confirmed, begin monitoring evacuated areas for CO2 concentration. When the presence of CO2 is confirmed at 300 PPM throughout the evacuated area, allow and/or assist the evacuees in returning to the area. Remove all barricades and warning signs. Advice all parties previously notified that the emergency has ended.

POST-EMERGENCY ACTIONS

In the event this plan is ever activated, the following post-emergency actions shall be taken in an effort to reduce the possibility of a recurrence of the type of problem that required its activation, and/or assure that any future activation will be as effective as possible:

- 1. Clean up, recharge, restock, repair, and/or replace emergency equipment as necessary, and return it to its proper place.
- 2. Critique all actions. Train or retrain Team Members in emergency procedures, etc., if the need is indicated.
- 3. Review the factors that caused or allowed the emergency to happen, and if the need is indicated, modify operating maintenance, and/or surveillance procedures.

APPENDIX F: Hydrogen Sulfide (H2S) Emergency Plan

HYDROGEN SULFIDE EMERGENCY ACTION PLAN

NORTH HOBBS UNIT RCF

Scope

This plan covers Occidental Permian Ltd. operations involving Hydrogen Sulfide in the **North Hobbs Unit RCF, Lea County, New Mexico.**

General Description

Attachment No. 1 indicates the aerial extent of the North Hobbs Unit RCF, the population density (number and location of residences or places of business), and location of any public roads or streets. The H2S concentration at the plant is 1.2 percent (12,000 PPM) at a maximum of 25 MMCF per day. The prevailing wind is from the southwest. (For ROE's - See Attached H-9).

The plan is based on the assumption that a total rupture could occur where the inlet lines connect at the inlet header.

There are no businesses or residences within 100 or 500 feet radius of exposure.

North Hobbs Unit RCF

- 1. If a leak or discharge of gas containing H2S should occur, the first responder will determine if the discharge is or could become a hazard to the public. Attachment No. 1 indicates the aerial extent of the North Hobbs Unit RCF and the location of public roads.
- 2. If the discharge presents no hazard to the public, appropriate action to eliminate the discharge using team members and equipment deemed necessary will be accomplished.
- 3. If the first responder determines that the leak is or may become a potential hazard to the public, the emergency action plan will be initiated:
 - a. See that immediate obvious measures are taken to eliminate the discharge, utilizing whatever team members or equipment necessary, before the discharge will become a hazard to the public.
 - b. If the discharge cannot definitely be eliminated before it will become a hazard to the Public, as soon as possible:
- 1. Notify the first available team leader from the emergency telephone list. The team leader, thus contacted, will notify the other Occidental team leaders and appropriate team members.
- 2. If the potential hazard involves a public road, the incident Coordinator will:
 - a. Proceed to the area of the leak and determine the extent of the hazard utilizing H2S monitoring equipment. If required, barricade at a safe distance on either side of the contaminated area.
 - b. Alert anyone observed to be within the area of potential hazard and assist those if they require help.
 - c. Take appropriate action to eliminate the discharge.
 - d. In performing the above actions, the incident Coordinator may utilize any team member deemed necessary.
 - e. If, and as soon as the incident Coordinator determines it is required, medical assistance and civil authorities will be notified. This could be before or after the incident Coordinator has proceeded to the area of the leak, depending on the information received with the first call. Telephone numbers for medical assistance and civil authorities are listed in the emergency telephone list.
 - f. Determine whether part of the gas gathering system must be shut in or allowed to flare based on site conditions.
- 3. If the potential hazard to the public involves a public road(s), the incident Coordinator will utilize the emergency telephone list and barricade any road(s) deemed necessary.
- 4. The incident Coordinator will determine if the procedures require appropriate breathing equipment to be performed safely. It will be ordered out, together with appropriate team members, when deemed necessary. Breathing equipment is located at the North Hobbs Unit RCF.
- 5. After the discharge has been eliminated, no repair work or entrance into the contaminated area or "hot zone" will be attempted until the incident Coordinator has declared the area safe. The only exception would be an entrance into the "hot zone" to perform a rescue, and then only by trained team members wearing appropriate breathing equipment.
- 6. An obvious emergency rescue will take priority over any other step and should be performed as soon as appropriate equipment is available to ensure that the rescuers will not be endangered.

APPENDIX G: Occidental Crisis Team and Local Resources

SUPPORT AND RESOURCE AVAILABILITY

A major incident may exceed the resources available at the site. Additional resources are available through the Occidental Crisis Plan at **713-935-7210** in the following areas:

Administrative	New Ideas
Communications	Press & Media
Engineering	Safety
Environmental	Security
Facility Design	Transportation & Logistics
Human Resources	Well Control
Legal/Claims	

ADDITIONAL TRANSPORTATION AVAILABLE LOCALLY

A limited number of companies owned vehicles are available at the Plants. If any additional vehicles are necessary, they can be obtained from a Rental Agency. Prior approval should be obtained from the Plant Manager.

Company aircraft will be made available for the transportation of the Occidental Crisis Team and other key Team Members in the event of a major emergency.

APPENDIX H: Emergency Specific Checklists

BOMB THREAT CHECKLIST

Date Name of Company

Name & Position of Person taking call

Telephone Number call came in on

FILL OUT COMPLETELY IMMEDIATELY AFTER BOMB THREAT

When is the bomb set to explode?	
Where is the bomb located?	
What does the bomb look like?	
What type of bomb is it?	
What will cause the bomb to explode?	
Did the caller place the bomb?	
Why did the caller place the bomb?	
What is the caller's name and address?	
Caller's: Sex Age Race	
Length of the call?	

DESCRIPTION OF CALLER'S VOICE (Check all that apply)

Calm	Laughing	Lisp	Disguised
Angry		Raspy	Accent
Excited	Normal	Deep	Deep
Slow	Distinct	Ragged	Loud
Slurred	Clearing	Rapid	Nasal
Throat	Stutter	Deep Breathing	Familiar

If voice is familiar, whom did it sound like?

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BACKGROUND SOUNDS:

Street Noises	House Noises	Factory Noises	Machinery
Crockery	Motor	Animal Noises	Voices
Office	PA System	Music	Static
Other Noises			
THREAT LANGUA	GE:		
Well-Spoken	Foul Language	Incoherent	Irrational
Taped	Message Read by	y Threat Maker	

COMMENTS & REMARKS (in detailed description):

APPENDIX I: H2S DISCHARGE CHECKLIST

☐ FIC to determine if leak could become a hazard to the public.
If leak is not a hazard, take appropriate action to eliminate the leak.
If leak is determined to be a hazard, and cannot be immediately eliminated:
Notify appropriate Team Leaders.

Proceed to area with all necessary personal protective equipment and monitors.

- Barricade roads as determined necessary.
- Call civil authorities for assistance.
- Alert anyone within the contaminated zone of the potential hazard.
- Notify hospital to alert staff for possible injuries and allow them the opportunity to initiate their emergency action plan.
- Contact every resident and/or business within the contaminated zone by the fastest possible means and advise them to evacuate by the proper route.
- ☐ If unable to contact residents or businesses by telephone, physically go to their location to determine that the residence or business is unoccupied. Eliminate leak as directed by the Field Incident Coordinator (FIC).

APPENDIX J: SPILL RESPONSE CHECKLIST

- Notify appropriate Team Leader in charge.
- Stop source of spill if safe to do so.
- PIC directs control and containment.
- Team Leader contacts PMT Manager.
- Refer to MSDS or DOT Response Guidebook for proper handling procedures.
- Refer to written procedures for Acid & Caustic Spills.

APPENDIX K: FIRE OR EXPLOSION CHECK LIST

- Manually activate Plant Phone Fire Alarm System.
- Team Member discovering fire gives location and nature of fire.
- Activate the Emergency Action Plan if deemed necessary.
- All Team Members, visitors and contract personnel evacuate to the mustering area and be accounted for and receive assignments.
- Call hospital and advise them of situation to enable them to activate their emergency action plans in readiness for any injuries that might be incurred.

DECONTAMINATION

Personnel responding to hazardous substance incidents may become contaminated in a number of ways and by various materials. To any emergency response where contamination of individuals, PPE, tools and equipment or clothing may result, this decontamination procedure should be considered the by the incident Coordinator.

RESPONSIBILITIES

The Incident Coordinator is responsible for the determination of initiating this decontamination procedure in the event of an emergency involving hazardous substances. The incident Coordinator will assign responsibility for organizing and running the decontamination station to the appropriately trained personnel.

CONTAMINATION/CONTAMINANTS

Personnel may become contaminated by:

Contacting vapors, gases, mists or particulate in air

Being splashed by materials while sampling or opening containers

Walking through materials or contaminated soil

Using contaminated tools or equipment

Contaminants to be considered include:

Caustics

Acids

Hydrocarbon Products

Chemical Additives

METHODS OF DECONTAMINATION

Several methods of decontamination may be employed, depending on the contaminant and material contaminated. These methods include:

Dilution...Simple flushing with water and/or soap

Absorption...Absorbing or picking up material with a neutral absorbent

Chemical Degradation...Altering the chemical structure of the material in order to neutralize it Isolation...Isolation of material for future retrieval

DECONTAMINATION PROCEDURE.... NINE (9) STEP

1. Establish an Entry Point

The point should be established and clearly marked. It should be located in the contamination Reduction zone leading from the Hot Zone.

2. Primary Decontamination

Remove as much solid and/or liquid material as possible from contaminated personnel by Showering...SCBA on!

3. SCBA Removal

Highly contaminated SCBA should be removed and isolated for complete decontamination later.

- 4. Removal and isolation of protective clothing.
- 5. Removal of personal clothing...As Necessary!
- 6. Decontamination of the body...As Necessary!
- 7. Drying and providing of clean garments...As Necessary!
- 8. Medical Evaluation...As Necessary!
- Transportation...As Necessary!
 Observation, rest, and Removal area.
 For high-risk contaminants, which require all nine steps, further medical evaluation may be Required.
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SOLUTIONS

The following are examples that may be used for decontamination of some common materials found in the facility. For specific chemical hazards, refer to the MSDS for that material.

Basic/Caustic Products

- 1. Concentrate premixed solution: Acetic acid in water.
- 2. Concentrate solution mixed with 8 liters of water in sprayer.
- 3. Mixture will be 4.5% solution.
- 4. Examples of products to use for:
- a. Sodium Hydroxide
- b. Anhydrous Ammonia will form Ammonium Hydroxide with water.
- c. Solutions with high Ph

Acidic Products

- 1. Concentrate premix solution: Sodium Hydroxide in water.
- 2. Mixture will be .5 M concentration.
- 3. Concentrate solution mixed with 8 liters of water in sprayer.
- 4. Examples of products to use for:
- a. Sulfuric Acid
- b. Chlorine will form HCL with water.
- c. Solutions with low Ph.

Hydrocarbon Products

- 1. Concentrate premix solution: Industrial soap in water.
- 2. Concentrate solution mixed with 8 liters of water in sprayer.
- 3. Examples of products used for:
- a. Gasoline/Naphtha products
- b. Aromatics including benzene
- c. Heavy fuel oils

UPDATED: 01/2021

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OXY Permian Crisis Management Plan

In revision process

UPDATED: 01/2021



APPENDIX D

Liquid Waste Permit

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E FERMIT OR REGISTRATION NMED Processing Number:	days prior to the inspection. Permit Fee: 5 O. 8 Multiple dwellings Other: 5 O. 8 B. Depth from Ground Surface to: 5 Seasonal High Water Table 100	Gravel, Cobblets, Highly permeable soil feet C. Soil Description: USDA Soil Class Methodology & Verification Submitted? Type Immediation Submitted? Type IImmediation Submitted? D. Domestic Water Source: Type IV=5 stigal/day	On-site Off-site Private Public Shared Imigation well, or flood irrigated area on lot? Yes No State Engineer Well Permit #: Yes No Name of Public Water System: Yes No IV. SYSTEM DESIGN Experimental System	Septic tank Manufacturer. Y Dr. (27) Capacity: 1000 Certification No: $\Delta / Vr1 = 6 - C - M$ ATS (Advanced Treament System) Disinfection Other (specify): Secondary Tertiary Sand filter Manufacturer.	B. Disposal System: Trench Leaching Bed Scepage Pit Privy Holding tank Elevated Bed Scepage Pit Vault Lined Evaportanspiration (ET) Bed Wisconsin Mound Imgartion Low pressure dosed Drip Gray water Other (specify): Pipe & Gravel Corvelless (type): Cray water Distribution box	C. Minimum required absorption area: AR. Application Rate) (AR. Application Rate) (AR. Application Rate) (Q. Dossign Flow) (C. Dossign Flow)
Received by QCD: 6/14/2023 4 40:40 PM CK INO DATE DATE DATE DATE DATE DATE DATE DATE	SYSTEM OWNERS NAME: Last, First, MI Home Phone: Business Phone: MANLING ADDRESS, StreetPO Box, City City City State Zip Code SYSTEM LOCATION: ALM	SUBDIVISION SUBDIVISION UNIFORM PROPERTY CODE: TOWNSHIP RANGE SECTION OTR OTP ATT TO ATT ATT	INSTALLER'S NAME & FIRM: C 1 (1.4) 7.4 (3) (1.3	I. PERMIT APPLICATION (instructions available on request) Application is for. New Permit Modification of an existing system Existing Permit No.(if applicable): ATS ownership transfer	 WASTEWATER SOURCES & DESIGN FLOWS IN GALLONS PER DAY (gpd) A. Proposed liquid waste system use and design flow. Single family residence no. of bedrooms Multiple family units no. of bedrooms Seasonal residence no. of units; no. bedrooms per unit Commercial/Institutional (type): 10. get tripleatives 	Intervention scrange sources on this property? Vest Mo Epd TOTAL WASTEWATER FLOW ON PROPERTY. Vest Mo Epd III. SITE INFORMATION A. Lot Size: 21(10) + Acres Date of Record: Date of Record: Epd A. Lot Size: 21(10) + Acres Date of Record: OPI Mo Date of Record: Date of Record: </th

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Page 77 of 87		r setback distances from both the tank and disposal field to property lines, buildings, structures, h20.7.3.302. IS attached disposal field to property lines, buildings, structures, h20.7.3.302. IS attached disposal field to property lines, buildings, structures, dispose of this permit does not relieve me from the responsibility of complying with all applicable provisions of aw.	esentative and Contractor SE ONLY ling of Existing Unpermitted Systems installed after February 1, 2002 skip this section and go to hereby: Construct No. Construct No.	te the system within one year. for providing inaccurate or incomplete information; or for failure to	NMED Representative Date Date Take No. LWP-H016-0007
Received by OCD: 6/14/2023 1:40:40 PM	V. SITE PLAN: Attach phr. diagram or picture file of the Leven	NWED Use: A plat, drawing or picture, including setback distances, in accordance within 200 feet of the 5ys The foregoing information is correct and true to the best of my knowledge. I understand the iss the New Mexico Plumbing Code and the New Mexico Liquid Waste Disposal and Treatment Re Print Name (1/10 L Code and the New Mexico Liquid Waste Disposal and Treatment Re Signature (1/10 L Code and the New Mexico Liquid Waste Disposal and Treatment Re Owner County regulation or ordinance or other requirements of state or federal Signature (1/10 L Control Representation Date Disposal and Treatment Re Durature (1/10 L Code and the New Mexico Liquid Waste Disposal and Treatment Re Durature (1/10 L Code and the New Mexico Liquid Waste Disposal and Treatment Re Durature (1/10 L Code and the New Mexico Liquid Waste Disposal and Treatment Re Durature (1/10 L Code) (1/10	VII. NMED PERMIT TO CONSTRUCT (For Registratious, ATS Owner's Authorized Rep Section VTII): A permit for CONSTRUCT (For Registratious, ATS Ownership Trausfer, or Permit Granted — Granted Subject to conditions Permit Conditions or Reasons for Denial: NMED 1.	NOTE: This permit may be canceled for failure to meet any condition specified: failure to complet for the notify NMED to schedule an inspection, a minimum of 2 working days prior to the inspection. If he system described above: was inspected by NMED Inspection History Contractor photo inspection	A permit for operation of the liquid waste disposal system described herein is hereby: - Granted - Granted subject to conditions

THE STATE OF	NEW MEXT
ONSITE LIQUID WAS	E SVSTEM INSPECTION
Period Barrier Charles Constitute English WAS	and 07/08
	MENT DES.
Address	added productions
Type of Inspection:	OTHER
1. BUILDING SEWER	Consultation of K
a. Correct Size and Material 20.7.3.813.C	c Correctly sized disposal area
b. Required Cleanouts Present, Installed Correctly & to Finish Grade 20.7.3.813.8	e Excevation at Correct Grade
c Pipe at Correct Grade (1 /8" to 1/4" per foot) 20.7.3.813.A	f. Correct Spacing Between Trenches or Beds
	g. Smeared Soils Not Present on Trench or Bed
2. PRE-TREATMENT	h. Correct Aggregate; Type, Size, Clean and Amount
a. I type:	i. Correct Depth of Aggregate Above and Below Pipe
D Installed as per Plans or Manufacturer's Instructions 20.7.3.401.1	i Correct Pipe; 2-hole, 4" Minimum Diameter, End Caps
	k. 1. 12 Aggregate Covered with Approved Material
3. SEPTIC TANK / SEC. / TERT. TREATMENT UNIT	1Plipe Covered with Geotextile Fabric in Place of Aggregate
Type Concrete Plastic/Fiberglass Sec./Tert Treatment Unit	m Inspection Port(s), Capped
a Located as per Site Plan 20.7.3,401.1	II Ullel.
b. Correct Setbacks 20.7.3.302, Table 302.1	a Underside of lid costed: riser provided as maximal
c Tank Certified; Correctly Labeled 20.7.3.501; 20.7.3.501 B.4	b. Dorned covers covered with minimum 2" covered
d Tank Correctly Oriented, Level & Depth Below Grade 20.7.3.501.J.7	c, Brick or block laid end to end with standard tight joints
cInlet / Outlet Pipes Sealed & Watertight	d. / Side wall inlet property vented
f Iniet / Outlet Baffle or Tee with Branch Extending 12* Minimum Below Liquid Level	e. Inlet/outlet fittings sealed
z Emuent Filter Installed, Riser to Grade	t' Locking or conurod Ed
Tank & Fittings Correctly Vented	
Concrete Tank: Coaled & Material Correct OR Type V Concrete	Other Disposal Methods:
Manholes Correctly Sized & I costed	a Type:
Manhole Risers at Grade Diameter Secure Lids & Costed	b. Installed per Plans or Manufacturer's Instructions
Tank Installed per Manufacturer's Instructions	c. Other:
Advanced Treatment Unit Installed per Manufacturer's Instructions	7. UN-SITE WELL MEASUREMENTS
) Water Tightness Test Conducted	b $(max - max - m$
) Water Softener Discharge Bypassing ATU	c. Fluoride: (mg/L)
. Other	(iig)=/
SURGE, PUMP AND HOLDING TANKS	8. GIS COORDINATES
/pe Surge Tank [] Pump Tank [] Holding Tank [] Other	Well: lat tong
Confect Size	Elev
Pump(s) & Alarms installed on concerts circuits personal and located	Sys: lat long_/ J J;
Manholes Risers Lids Correct and Water Tight	Elev 3 d C -
	9,
TEE/DISTRIBUTION BOX/HEADER	COMMENTS/VIOLATIONS
4" Diameter	Continued on attached Sheet(s)
Tee Level/Header	
"D" Box Level and on Concrete Slab or Stable Soil	
"D" Box Inlet Baffled and 1" Above Outlets	
"D" Box Outlets at Same Height; Equal Flow to Outlets	Installation Approved
Tee or "D" Located a Min. of 5' From Disposal Field.	Installation Approved w/conditions (See
	Comments/Violations)
	Installation Not Approved (See
Solit Type Verified	Comments/Violations)
Correct Clearance to Ground Water or Limiting Laws	10. Final-Approval
ditional comments:	U Granted I Not Granted
	I walked 1111 1 - 1.
	NMED Inspector, Date
K If installed and month Remain	I certify that this liquid waste system was installed in accordance
as a mistalled and meets requirements	with the permit approved by NMED, upless otherwise noted in
VI • Not inspected A/P • As Proposed	a set por approved by thirdby, diffess otherwise indeed in
//I • Not inspected A/P • As Proposed //C • Not Compliant N/V • Not Verified	in Comments Section above.
III • Not inspected A/P • As Proposed I/C • Not Compliant N/V • Not Verified I/A • Not applicable N/T • Not Tested EX - Existing	in Comments Section above.
I/I • Not inspected A/P • As Proposed I/C • Not Compliant N/V • Not Verified I/A • Not applicable N/T • Not Tested EX - Existing	Installer, Date



APPENDIX E

Typical Inspection Forms

API-653 & API-12R require that routine visual/external inspections are done on all storage tanks within a facility on a monthly basis. The inspection may be done by operations personnel. Personnel performing this inspection should be knowledgeable of the storage facility operations, the tank, and the characteristics of the product stored. After completion of the form, turn it over to the Maximo personnel so that it can be scanned and attached to the monthly PM. Any follow-up action will be done by an authorized inspector.

		Comments	NO PROBLEMS										
	s Tanks	Foundation	[
	Fiberglas	Cracks											
eded	Steel Tanks	Corrosion											
w-up Ne		Paint / Coating					†						
if Follo		Foundation											
Check	All Tanks	Settlement										-	1
		Shell Distortion										-	1
		Leaks											
		Description	GUN BARRELL TANK	PRODUCED WATER TANK	SPILL OVER TANK	CRUDE OIL STORAGE TANK	CRUDE OIL STORAGE TANK	METHANOL STORAGE TANK	TEG MAKE-UP TANK	GLYCOL MAKE UP TANK			
		Asset No.	710958	709731	709732	709733	709734	709419	642249	707928			
		Tag No.	ABJ-4800	ABJ-4820	ABJ-4830	ABJ-4840	ABJ-4880	ABJ-11960	ABJ-3210	ABJ-3215			

Date of Inspection: 3 - 5 - 2023

Name of Operator: JAMES KING

North Hobbs Inspections

To be completed by: Operations Deadline: Monthly

Status	Inspection Items	Yes/No	Notes
	Compressor station Clean, No hazards		
	Safety Equipment inspected		
	Buildings clean and orderly		
	Safety Signage in place and ledgible		
	Spills		
	Secondary containmentsor berms in good shape		
	No empty barrels		
	Gas leaks		
	Other		



APPENDIX F Cost of Closure Estimate

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COST-TO-CLOSURE (CTC) ESTIMATE NORTH HOBBS RCF AND NGL PLANT OPERATIONAL CLOSURE LEA COUNTY, NEW MEXICO

Date Prepared:	04/17/23
Previous Estimate dated:	Original

This Cost to Closure (CTC) estimate is to accrue for probable and estimable expenditures related to:

Clo sul the ne for	sure of the gas plant as required in the discharge permit application prepared in response to a notice from the New Mexico Oil Conservation Division (NMOCD) stating Oxy's natural gas plants are ject to the permitting requirements of Title 20, Chapter 6, Part 2 of the New Mexico Administrative Code (NMAC). There are no immediate or pending plans for the closure of the gas plant and, refore, expenditures have been categorically tasked reasonably as listed in Section 10 of Oxy's permit application package prepared in April 2023. Prior to the start of any closure activities, Oxy will refore evaluate all costs, contracts, subcontractors and gas plant inventory to appropriately estimate expenditures in an internal addendum to this document. This documnent has been prepared Oxy and estimates non-Oxy effort as understood by Ensolum.
СН	ANGES to Scope (from previously accrued estimate):
Or	ginal Estimate
Th	is cost estimate includes costs for (DESCRIPTION of proposed activities): (try to match DESCRIPTION line numbers below to the TASK line numbers on page 2 - below)
2	Pre-Job Planning - following award to all contractors, site walk/pre-job meeting, job plan, health and safety planning, One Call notifications
3	Site decommissioning: Remove all fluids from aboveground storage tanks (ASTs), and sumps.
4	Site decommissioning: Off-site disposal or recycling of liquids/sludges
5	Site decommissioning: Waste profiling - any unused chemicals will be identified and profiled, then handled and disposed of or recycled using a third-party waste handler licensed and certified to handle hazardous and non-hazardous waste
6	Site decommissioning: Dismantle ASTs, storage vessels, process equiment, and piping and removed from the facility
7	Site decommissioning: Excavate sumps
8	Site decommissioning: Dispose scrap material and equipment off-site through recycling or based on appropriate waste profiling
9	Site decommissioning: Dispose of solid waste material off-site (buidling materials, concrete, containment metal, line and miscellaneous metal or lumber
10	Collect soil samples from each plant process area to identify any residual impacted soil prior to reclamation
11	Regrade, restore and contour site
12	Provide closure documentation to NMOCD for review
Th	e attached CTC estimate is based on the following ASSUMPTIONS: (try to match ASSUMPTION line numbers below to the TASK line numbers on page 2 - below)
1	There are no releases, residual contamination, or impacts to soil, groundwater or surface water at the facility
2	All tankage, piping, instrumentation, and process equipment will be in a condition consistent with recent operations and standard shut-down procedures.
3	Costs for investigation, monitoring or supplemental corrective action related to historic releases are not included herein.
4	Costs do not include asset retirement obligations, legal filing or transfer of deed costs
5	Costs do not include land access agreement fees, lease/right of way agreements, foreiture fees, or similar
6	Costs do not include electrical feed equipment and disconnects
7	Costs do not include daily decommissioning oversight by a third party
8	The decomissioning subcontractor will direct bill to Oxy but be managed and overseen by a thirdy party
9	NORM, asbestos containing material, or other hazardous materials are not present at the site to managed for transportation/disposal off-site
10	Cost assumes there will be no equipment sales and all equipment and tankage will be scrapped.
11	Ensolum costs and subcontractor costs include a 10% and 25% contingeny, respectively, due to the open nature bid of this CTC in 2023
	(insert/delete rows above as needed)

<u>\$555,900</u>

\$4,261,900

+ 15% Oxy Contingency

TOTAL ESTIMATED PROJECT COST

COST-TO-CLOSURE (CTC) ESTIMATE	COST-TO-CLOSURE (CTC) ESTIMATE 04/17/23 NORTH HOBBS RCF AND NGL PLANT OPERATIONAL CLOSURE Page 2								
This cost estimate includes: <u>TASK:</u>	Ensolum: (MSA)	Demo Sub: (MSA)	Misc Subs: (MSA)	Misc Subs: (MSA)	Misc Subs (no MSA)	LAB: (no MSA)	<u>SubTOT:</u>	<u>Year(s):</u> (1-4+)	
1 Pre-closure planning	\$4,000	\$2,000					\$6,000	1	
² Pre-job planning	\$4,000	\$2,000					\$6,000	1	
³ Site decommissioning (ranged average with assumptions)	\$12,000	\$3,500,000		_	_		\$3,512,000	1	
4 Soil sample collection	\$9,000			_	_	\$6,000	\$15,000	1	
⁶ Site closure and regulatory/stakeholder correspondence	\$17,000						\$17,000	1	
7							\$0		
(insert/delete rows above as needed)									
SubTotals>>>	\$46,000	\$3,504,000	\$0			\$6,000	\$3,556,000		
\$3,556,000 SUBTOTAL CONTRACTED (from above) + Other Expenditures (list): + Annual Land/Lease Payments									
\$150,000 + Thirdy Party Expenses (est. \$2,000/day) No. of field days requiring a third party= 75 \$3,706,000 TOTAL CONTRACTED No. of field days requiring a third party= 75									

State of New Mexico Energy, Minerals and Natural Resources Department

Michelle Lujan Grisham Governor

Sarah Cottrell Propst Cabinet Secretary

Todd E. Leahy, JD, PhD Deputy Cabinet Secretary **Dylan Fuge**, Division Director **Oil Conservation Division**



BY ELECTRONIC MAIL ONLY

July 27, 2023

Chris Poe Occidental Permian Ltd. P.O. Box 27570 Houston, TX 77227 Chris Poe@oxy.com

RE: Occidental Permian Ltd. - Notice of an Administratively Complete Discharge Permit Application for North Hobbs Recompression Facility and Natural Gas Liquids Plant

Dear Mr. Poe:

The New Mexico Energy, Minerals and Natural Resource Department's Oil Conservation Division (OCD) has reviewed your amended discharge permit application, dated June 13, 2023, for Occidental Permian Ltd. (Oxy), North Hobbs Recompression Facility and Natural Gas Liquids Plant. OCD has determined that the amended discharge permit application is administratively complete.

Given OCD's determination, Oxy must provide public notice within 30 days of receipt of this letter (i.e., August 26, 2023) in accordance with the requirements of 20.6.2.3108(B) NMAC to the general public in the locale of the Plant by each of the methods listed below:

- 1. Prominently posting a synopsis of the public notice at least 2 feet by 3 feet in size, in English and in Spanish, at the Plant's main entrance and at the Hobbs, NM Post Office for 30 days;
- Providing written notice of the discharge by mail or electronic mail, to owners of record of all properties within a 1/3 mile distance from the boundary of the property where the discharge site is located; if there are no properties other than properties owned by the discharger within a 1/3 mile distance from the boundary of property where the discharge site is located, Oxy shall provide notice to owners of record of the next nearest adjacent properties not owned by the discharger;
- 3. Providing notice by certified mail, return receipt requested, to the owner of the discharge site if Oxy is not the owner; and

4. Publishing a synopsis of the notice in English and in Spanish, in a display ad at least three inches by four inches *not* in the classified or legal advertisements section, in the Hobbs News-Sun. Note, the public notice in the application appears to contain an error. The provided longitude should not contain the negative sign. The actual published public notice needs to correct this error.

As per 20.6.2.3108(F) NMAC, the notice must also include the address and phone number within OCD by which interested persons may obtain information, submit comments, and request to be placed on a facility-specific mailing list for future notices and that OCD will accept comments and statements of interest regarding the application and will create a facility-specific mailing list for persons who wish to receive future notices. The proposed public notice needs to replace Shelly Wells with the following OCD contact information:

Leigh Barr – Administrative Permitting Supervisor New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87505 (505) 795-1722 LeighP.Barr@emnrd.nm.gov

Within 15-days of completion of the public notice requirements in 20.6.2.3108(B) NMAC, Oxy must submit to the OCD proof of the notice, including affidavit of mailing(s) and the list of property owner(s), proof of publication, and an affidavit of posting, as appropriate.

Also, as part of the discharge permit application, Oxy was required to submit a Closure/Post Closure Plan for OCD approval. OCD has reviewed this plan and hereby approves the Closure/Post Closure Plan. The financial assurance (FA) associated with this plan is \$4,261,900. The FA must be on OCDprescribed forms, or forms otherwise acceptable to the OCD, payable to the OCD. Bond forms can be found at the bottom of OCD's Forms Page located at <u>https://www.emnrd.nm.gov/ocd/ocd-forms/</u>. The FA is due to the OCD within 30-days of email receipt of this letter (i.e., August 26, 2023).

If you have any questions, please do not hesitate to contact me by email or by phone (see above contact information). On behalf of the OCD, I wish to thank you and your staff for your cooperation during this process.

Regards,

Leigh Barr

Leigh Barr Administrative Permitting Supervisor

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State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. Santa Fe, NM 87505

CONDITIONS

Operator:	OGRID:
OCCIDENTAL PERMIAN LTD	157984
P.O. Box 4294	Action Number:
Houston, TX 772104294	227506
	Action Type:
	[UF-DP] Discharge Permit (DISCHARGE PERMIT)

CONDITIONS

Created	Condition	Condition
Ву		Date
lbarr	None	7/27/2023

Action 227506