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Frontier Field Services, LLC
OGRID 221115
Gathering System Operations Plan
NMAC 19.15.28 – Natural Gas Gathering Systems

Prepared For:
New Mexico Energy, Minerals and Naturals Resources Department
Oil Conservation Division

February 13, 2025

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Contents

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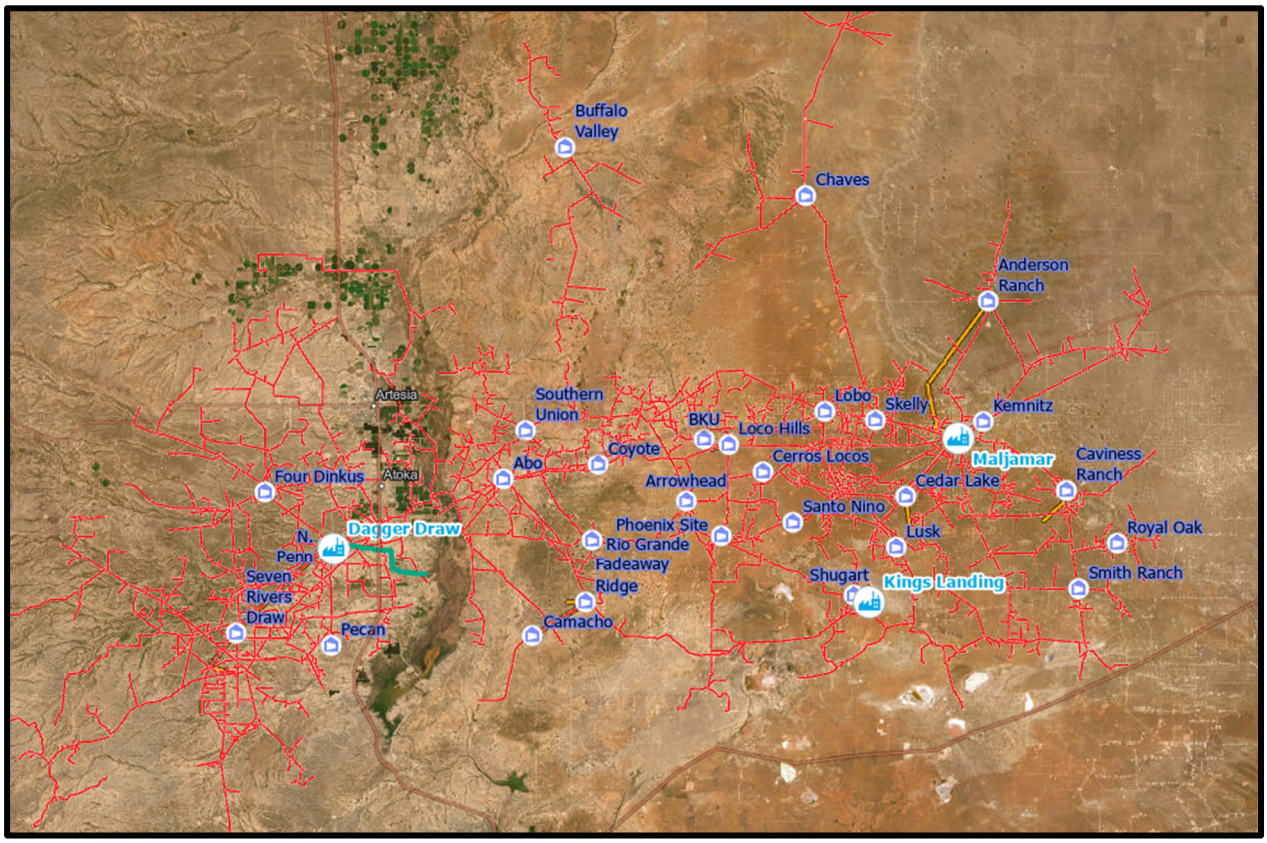
1.0 Company Overview

Frontier Field Services, LLC (FFS) is a wholly owned operating subsidiary of Kinetik Holdings LP (Kinetik) headquartered in Houston, Texas. Kinetik acquired the FFS assets from Durango Midstream on June 25, 2024.

2.0 Gathering System Overview

The FFS gathering system includes approximately 2,085 miles of gas gathering pipelines, two cryogenic gas processing plants, and 19 active compressor stations. The purpose of the gathering system is to collect natural gas from producer wells connected to the system. FFS compresses, treats, and processes the gas prior to delivery to a transportation pipeline for delivery to markets. The gathered gas from the entire system is processed either at the Maljamar or Dagger Draw Gas Plants. Details of the gathering system are presented in Tables 1, 2, and 3. An overview of gathering system facilities and pipelines is depicted in Figure 1 below.

Figure 1- Overview Map



Note: some proposed, inactive, or abandoned facilities are also shown here.

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Table 1 - Frontier Field Services Facilities

Facilities	Facility or Line Type	Status	Service	Distance (Miles)
Aid State	Compressor Station	Inactive	NA	NA
Arrowhead	Compressor Station	Active	Sour	NA
Atoka 3	Delivery Point	Inactive	NA	NA
BKU	Compressor Station	Active	Sour	NA
Buffalo Valley	Compressor Station	Active	Sour	NA
Camacho	Compressor Station	Active	Sweet	NA
Caviness Ranch	Compressor Station	Active	Sour	NA
Cedar Lake	Compressor Station	Active	Sour	NA
Chavez	Compressor Station	Inactive	NA	NA
Coyote	Compressor Station	Active	Sour	NA
Dagger Draw	Gas Plant	Active	Sour	NA
Empire Abo	Compressor Station	Active	Sour	NA
Fadeaway Ridge	Compressor Station	Active	Sweet	NA
Four Dinkus	Compressor Station	Active	Sour	NA
Kemnitz	Compressor Station	Active	Sour	NA
Lobo	Compressor Station	Active	Sour	NA
Loco Hills	Compressor Station	Active	Sour	NA
Lusk	Compressor Station	Active	Sour	NA
Maljamar	Gas Plant	Active	Sour	NA
North Pen	Compressor Station	Active	Sour	NA
Seven Rivers Draw	Compressor Station	Active	Sour	NA
Shugart	Compressor Station	Active	Sour	NA
Skelly	Compressor Station	Active	Sour	NA
Southern Union	Compressor Station	Active	Sour	NA

Table 2 - Frontier Field Services Pipeline Mileage

Pipeline Description	Line Type	Status	Service	Distance Miles
High Pressure Gathering	Gathering	Active	Sour	170.51
Low Pressure Gathering	Gathering	Active	Sour	1220.41
High Pressure Gathering	Gathering	Active	Sweet	90.32
Low Pressure Gathering	Gathering	Active	Sweet	799.44
Total				**2280.68**

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Table 3 –Pipeline Attributes

Rating	Service	Size (in)	Miles by Material		Miles by Size
			Plastic	Steel	
Low Pressure	Sour	2.00	1.02		1.02
Low Pressure	Sour	2.38	0.12	10.29	10.41
Low Pressure	Sweet	2.50	3.85	9.21	13.06
Low Pressure	Sour	2.50		5.49	5.49
High Pressure	Sour	2.50		0.29	0.29
Low Pressure	Sour	2.68		1.45	1.45
Low Pressure	Sweet	3.50	1.62	2.00	3.62
Low Pressure	Sour	3.50	16.05	12.65	28.70
Low Pressure	Sour	4.00	1.42	2.23	3.66
Low Pressure	Sweet	4.50	5.88	404.21	410.09
Low Pressure	Sour	4.50	105.75	137.80	243.56
High Pressure	Sour	4.50		6.52	6.52
High Pressure	Sweet	4.50		5.63	5.63
Low Pressure	Sour	6.00	5.32	2.32	7.64
Low Pressure	Sour	6.38		0.14	0.14
Low Pressure	Sweet	6.62	0.45		0.45
Low Pressure	Sweet	6.63	5.36	173.93	179.29
Low Pressure	Sour	6.63	212.74	190.03	402.77
High Pressure	Sour	6.63		48.28	48.28
High Pressure	Sweet	6.63		12.79	12.79
Low Pressure	Sour	8.00	0.56		0.56
Low Pressure	Sweet	8.63	7.47	119.24	126.71
Low Pressure	Sour	8.63	105.52	87.44	192.95
High Pressure	Sour	8.63	0.05	45.19	45.23
High Pressure	Sweet	8.63		17.72	17.72
Low Pressure	Sour	8.63	0.11		0.11
Low Pressure	Sour	10.00	2.93		2.93
Low Pressure	Sweet	10.75	6.25	19.00	25.25
Low Pressure	Sour	10.75	58.61	50.11	108.72
High Pressure	Sour	10.75		27.62	27.62
Low Pressure	Sweet	12.00	0.38		0.38
Low Pressure	Sour	12.00	1.64		1.64
Low Pressure	Sweet	12.75	9.66	19.31	28.97
Low Pressure	Sour	12.75	101.95	45.80	147.75
High Pressure	Sour	12.75	2.26	40.30	42.56
High Pressure	Sweet	12.75	9.44	27.13	36.57
Low Pressure	Sour	14.00	2.68	0.40	3.08
Low Pressure	Sweet	16.00	11.61		11.61
Low Pressure	Sour	16.00	15.20	5.63	20.83
Low Pressure	Sour	18.00	11.47	5.60	17.06
Low Pressure	Sour	20.00	5.65	0.01	5.65
High Pressure	Sweet	20.00		17.62	17.62
Low Pressure	Sour	22.00	5.64	0.13	5.77
Low Pressure	Sour	24.00	8.47	0.04	8.51
Total Mileage			**727.14**	**1553.54**	**2280.68**

3.0 Operational Practices to Minimize Waste of Natural Gas

3.1 Pipeline Inspection

Pipeline operations personnel are instructed and trained to be observant for signs of pipeline leaks, corrosion, and or exposed pipe during the normal course of their daily field operations. If an issue or potential issue is observed, it is communicated to the pipeline operations supervisor for timely follow up and corrective action.

3.1.1 Right of Way Patrols

Right of way patrols (inspections) are conducted by FFS pipeline operations personnel on an annual basis. Areas with known and/or historical issues are patrolled on a weekly basis.

3.1.2 Aerial Surveys

Aerial surveys of the FFS gathering system via airplane, helicopter, or drone commenced during the first quarter of 2022. Surveys have been and will continue to be conducted on at least an annual basis after the initial survey.

3.2 Cathodic Protection

Test point surveys are conducted on an annual basis and rectifiers readings are observed and recorded monthly. All steel pipeline installations include cathodic protection measures.

3.3 Corrosion Control & Chemical Treatment

Water samples are obtained and analyzed on a quarterly basis on FFS backbone system, the Fadeaway Ridge Compressor Station, and the Skelly Compressor Station. A chemical treatment program has been implemented on all high-pressure sour gathering pipeline segments.

3.4 Pipeline Liquids Management – Pigging

To maintain maximum pipeline efficiency and minimize gas releases to the environment, pigging operations are conducted on all high-pressure gathering lines on a frequency that ensures hydraulic efficiency and reduces the risk of standing liquids in the pipeline.

3.5 Pipeline Testing

All new pipeline segments are hydrostatically tested prior to being placed into service per good engineering practices

3.6 Pipeline Maintenance

Routine pipeline maintenance of the FFS gathering system consists of replacing missing and or damaged pipeline markers, maintaining pipe to soil interfaces, and performing routine maintenance on pigging valves.

In the event a pipeline segment is required to be depressurized prior to initiating maintenance activities, the volume of gas contained within the segment will be routed to a temporary flare if technically able to do so.

If depressurization of the pipeline to a temporary flare is technically infeasible and/or presents a safety issue or concern, the pipeline segment will be depressurized to the atmosphere.

4.0 Compressor Station Operations

4.1 Depressurization

Each compressor blow down is entered into FFS's Environmental Management Information System (EMIS) database and quantified. Compressor blow downs are routed to one of two places:

1. To flare at FFS compressor stations equipped with a flare header and flare.
2. To atmosphere at FFS compressor stations that are not equipped with a flare.

For any compressor blowdown to atmosphere, FFS has implemented a cascading blow down policy whereby higher stages are routed to the lowest pressure stage prior to release to the atmosphere.

4.2 Dehydration

To decrease the incidence of corrosion and eliminate free liquids within the gathering system, TEG systems are used to remove moisture from the field gas stream thereby maximizing pipeline efficiency. Where compressor station pressures allow, both the flash tank and still vent are routed back to the station inlet thereby reducing overall TEG system emissions.

4.3 Storage Tanks

Produced water and condensate storage tanks are inspected on a weekly basis for leaks within the interconnecting pipe and to ensure the thief hatches are securely closed and operating properly. At new FFS compressor stations, condensate is routed to a heater treater (stabilizer) to reduce the Reid vapor pressure (RVP) of the condensate, providing a stabilized product in the storage tanks and thereby reducing emissions. Stabilizer over-heads are routed back to the station inlet lowering overall emissions for the facility. Working and breathing losses from condensate storage tanks are routed to an enclosed combustion device for emissions control.

4.4 Instrument Air

Instrument air in lieu of residue gas is utilized at FFS newer compressor stations and is a standard design element for all new and modified compressor stations.

Additionally, FFS is in the process of phasing out all pneumatic devices utilizing residue gas as motive gas over the next several years and replacing these systems with instrument air where technically feasible.

4.5 Audible, Visual, and Olfactory (AVO) Inspections

An AVO sensory leak is the indication of a leak identifiable by sensory methods (i.e., audible, visual, olfactory) or any other detection method used to determine a potential leak to the atmosphere.

When an AVO sensory leak is found, an attempt at repair will be performed no later than within 15 days of discovery. Repair all leaking components shall occur no later than 30 days after the leak is discovered.

The surveyor making the AVO observation shall attempt to repair any leaks identified during the AVO inspection. If each leak repair attempt is not successful, then the surveyor will assign the leak(s) to the maintenance crew for repair. The maintenance crew will repair the leak and notify the environmental compliance coordinator that the leak(s) have been repaired.

AVO inspections are required for Frontier Field Services (FFS) compressor stations once per calendar week in accordance with New Mexico Energy & Natural Resources Department (NMENRD) regulations effective May 25, 2021.

AVO Inspection Procedure:

- AVO inspections shall occur weekly.
- The electronic AVO inspection form must be used to document the inspections. See Appendix 1 for an example of the electronic form. If a surveyor does not have access to the electronic form, a hardcopy (paper form) may be substituted until access to the electronic form is completed.
- Inspections can be carried out by contractors or by Operational personnel familiar with the LDAR Program.
- Inspections are done as early in the week as is practical.
- For the inspection, observe components that may have visible leakage including dripping, spraying, misting, or clouding. Other indications of leaks include puddling or stains that are indicative of an existing evaporated drip.

- Listen to process equipment to determine if a leak is occurring. Abnormal hissing sounds may indicate a leak.
- Use olfactory senses while performing the AVO inspection to detect abnormal odors that may indicate a leak of process fluids.
- If any AVO leaks are observed, a leak tag shall be attached.
- If using the paper form, give all completed inspection forms to the site Environmental representative within 24 hours, as these checklists are required documentation.
- Maintain a log that includes the name of the person conducting the inspection and the date on which leak inspections are made, the findings of the inspection, and a list of leaks by tag identification number. Leak records shall be maintained for a period of not less than 5 years from the date of their occurrence.
- Maintenance shall keep a supply of components or component parts that are recognized by to wear or corrode, or that otherwise need to be routinely replaced, such as seals, gaskets, packing, and pipe fittings.

5.0 Pipeline Release & Reporting Policy

5.1 Scheduled Maintenance

Scheduled maintenance of the gathering system is coordinated between the FFS Director of Operations, the FFS pipeline operations supervisor and the Kinetik marketing department. Affected upstream producers will be notified in accordance with NMAC 19.15.28.8.D.1 and as follows:

- In writing within 14 days prior to the date of the scheduled maintenance event
- The written notification will include:
  - The date of the maintenance event
  - The expected duration the gathering system will be unavailable

5.2 Unscheduled Maintenance

Affected upstream producers will be notified of an unscheduled maintenance event (emergency or malfunction) event in accordance with NMAC 19.15.28.8.D.2 and as follows:

- Verbal notification as soon as possible but no later than 12 hours after discovery
  - The verbal notification will include the date and expected duration the gathering system will be unavailable
  - Written confirmation of the verbal notification including the date, time, person, and telephone number to whom verbal notification was given no later than 24 hours after discovery.

5.3 Emergencies & Emergency Response

FFS has implemented an Emergency Action Plan for addressing emergency conditions at all FFS facilities located within New Mexico. The plan addresses any uncontrolled or emergency condition at an FFS facility that requires immediate action to provide safety of the public and for individuals at the emergency site, and/or to prevent or control damage.

Any of the following or similar events might be treated as or result in an emergency:

- Fire and/or explosion
- Rupture or serious leak
- Natural disaster (e.g., tornado, flood or winter weather resulting in serious damage to Company Facilities)
- Hostage situations, threatening phone call or credible bomb threat.
- After notification of any witnessed account which has been verified by company personnel that could result in a crisis involving Company Facilities
- Unplanned emergency shutdown of the facility or a component of the facility
- Spill or release resulting in environmental pollution

A copy of the plan is available on request.

5.4 Internal Release Reporting and Response

Upon notification of a potential leak and or pipeline release, the pipeline supervisor or his designee will be dispatched to the potential release location. Upon verification the release is in fact a FFS line and associated release, the pipeline supervisor or his designee shall conduct the following:

- The individual discovering the release shall make all reasonable efforts to both stop and contain the release to mitigate the impact of the release to human health and the environment.
- The individual discovering the release shall also attempt to determine the quantity and rate at which the release is occurring or has occurred. The individual will determine the approximate location of the release using GPS coordinates as well as note the date and time of discovery.
- Determine volume of the release:
    - For liquids, the volume will be estimated in barrels (bbl.) using an industry accepted estimation methodology.
        - The liquids estimate will specify a volume for each of the following:
            - produced water,

- crude oil, and
- condensate.

- For gas, the volume will be estimated in thousand cubic feet (MCF) and will specify if the gas release is sweet or sour.

Liquid Releases with a volume of 5 barrels or less and gas releases less than 50 MCF:

- If the release is a liquid release with a total volume of 5 barrels or less or a gas release less than or equal to 50 MCF:
  - The pipeline supervisor or his designee shall engage the FFS preferred pipeline repair contractor to repair the line and remediate visual contamination associated with the release.

Liquid Releases with a volume of 5 barrels or more and gas releases greater than 50 MCF:

- If the release is a liquid release with a total volume of greater than 5 barrels or a gas release greater than 50 MCF:

  - The pipeline supervisor or his designee shall engage the FFS preferred pipeline repair contractor to repair the line only.
  - The pipeline supervisor or his designee shall inform the Kinetik Environmental Specialist that the release is estimated to be greater than 5 barrels and / or 50 MCF.
  - The Kinetik Environmental Specialist shall engage the FFS preferred pipeline remediation contractor to commence remediation activities.

Notification of ALL pipeline releases shall be made via internal incident reporting form within 24 hours of discovery to inform the foll

- Kinetik VP of Operations
- Kinetik Director of Field Operations
- Kinetik Director of Plant Operations
- Kinetik Environmental Manager
- Kinetik Field Operations Supervisor
- Kinetik Environmental Specialist

5.5 Administrative Agency Reporting

Notification to the New Mexico Oil Conservation Division (OCD) will be reported by the Kinetik Environmental Compliance Team. Notification will occur as follows:

- Minor Releases
  - Liquid release greater than 5 barrels, and / or a gas release greater than 50 MCF but less than 500 MCF:

- Notification to the appropriate OCD division office will occur in writing within 15 days of discovery of the release by completing and filing form C-129.

- Major Releases
  - Liquid release greater than 25 barrels, and / or a gas release greater than 500 MCF.
    - Notification will be conducted verbally or by email within 24 hours of discovery to the OCD Division Environmental Bureau Chief and the appropriate OCD division office
    - Notification will include relevant information required in the OCD form C-141.
    - Notify the division office in writing within 15 days of discovery using form C-141.
    - Notification will also verify prior verbal or email notification and will include additions or corrections to the information (if applicable) contained in the prior verbal or e-mail notification.

Table 4 summarizes reporting scenarios and appropriate NMOCD filings.

Table 4 - NMOCD Reporting Requirements

NM Release Description	NMOCD Report Required	Timing	Release Category per NMOCD
Venting, Flaring >8 Hours and >50 MCF	C-129	Within 15 days of discovery	Minor
Venting, Flaring >8 Hours and >500 MCF	Notice of Major Event (C-129)	Within 24 hours of discovery	Major
	C-129A (C-129 Amended)	Within 15 days of discovery	Major
Gas Release >50 MCF (Leaks aka Emergency or Malfunction)	C-129	Within 15 days of discovery	Minor
Liquid Release >5 bbl & Gas Release >50 MCF	C-141	Within 15 days of discovery	Minor
Liquid Release >25 bbl & Gas Release >500 MCF	Notice of Release (C-141)	Within 24 hours of discovery	Major
	C-141	Within 15 days of discovery	Major

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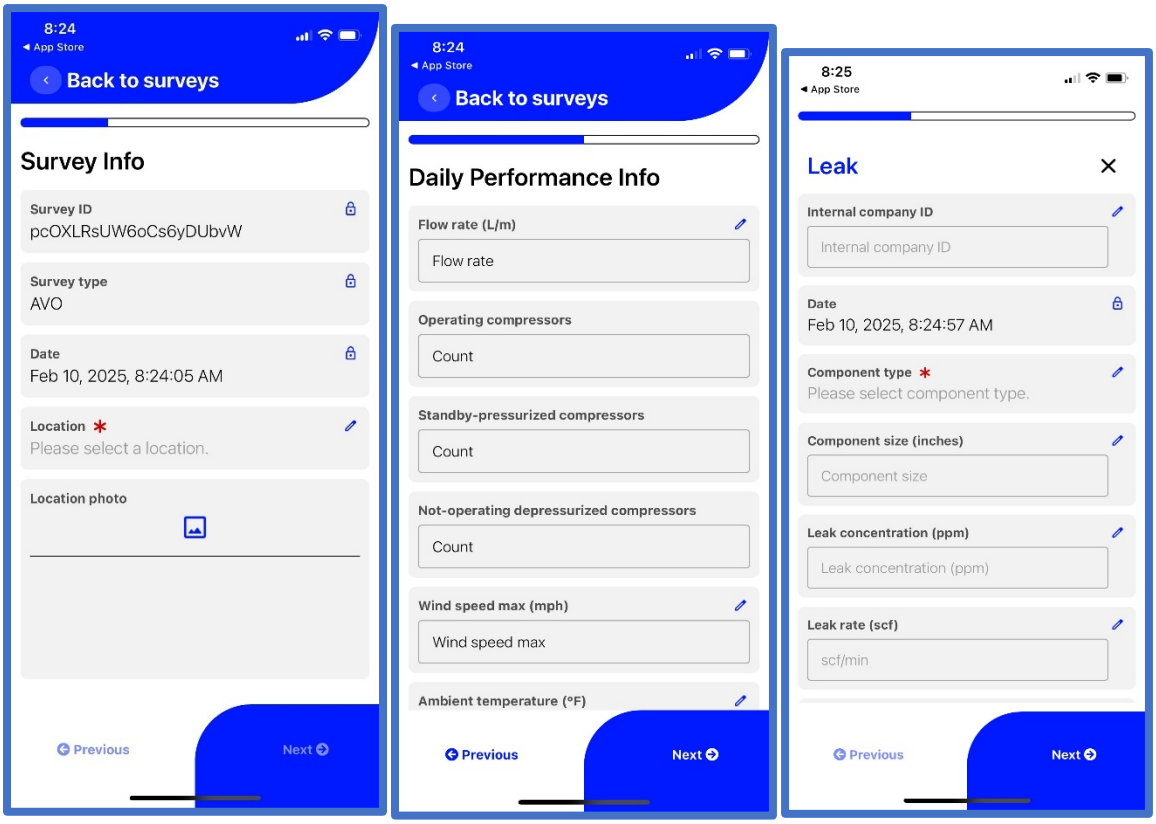
Appendix 1

Electronic AVO Form Example



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Weekly AVO Form

Facility Name:		Week Beginning:	

Any leaks found by AVO?		If yes, Leak Location Description	Repair Attempt			
No	Yes		Describe Repair	Date	Time	Successful?

Comments

Name of Surveyor: _____

Signed: _____ Inspection Date: _____

Please provide this form to the site environmental representative as soon as possible after completing the inspection.

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
https://www.emnrd.nm.gov/ocd/contact-us

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

QUESTIONS

Action 431872

QUESTIONS

Operator: FRONTIER FIELD SERVICES, LLC 303 Veterans Airpark Lane Midland, TX 79705	OGRID: 221115
	Action Number: 431872
	Action Type: [NGGS] NGGS Operations Plan (NGGS-OP)

QUESTIONS

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

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
https://www.emnrd.nm.gov/ocd/contact-us

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

ACKNOWLEDGMENTS

Operator: FRONTIER FIELD SERVICES, LLC 303 Veterans Airpark Lane Midland, TX 79705	OGRID: 221115
	Action Number: 431872
	Action Type: [NGGS] NGGS Operations Plan (NGGS-OP)

ACKNOWLEDGMENTS

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