

H2S – 042

H2S Contingency Plan

2014

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

David Martin
Cabinet Secretary

Brett F. Woods, Ph.D.
Deputy Cabinet Secretary

Jami Bailey, Division Director
Oil Conservation Division



FEBRUARY 26, 2014

Mr. Russ Ortega
Director SENM Asset
DCP Midstream, L.P.
1625 West Marland Street
Hobbs, NM 88240

RE: DCP Midstream L.P. (H2S-042): "Eunice Gas Plant" H2S Contingency Plan dated September 21, 2011, in Lea County, New Mexico

Dear Mr. Ortega:

The Oil Conservation Division (OCD) is in receipt of DCP Midstream L.P.'s "Eunice Gas Plant" H2S Contingency Plan (plan) dated September 21, 2011.

The plan was submitted before the OCD developed its H2S Contingency Plan (CP) "checklist" (see attachment) for the above subject facility. The checklist helps the operator and OCD to review a plan for compliance with 19.15.11 NMAC (Hydrogen Sulfide Gas) and may help with subsequent communication on the plan.

OCD requires resubmittal of the plan within 60 days of the date of this letter. If you have any questions, require an electronic version of the checklist to add response comments, please contact Carl Chavez of my staff at (505) 476-3490, mail at the address below, or email at CarlJ.Chavez@state.nm.us. Thank you.

Sincerely,

Scott Dawson
Deputy Director

SD/cjc

Attachments

cc: Mr. Daniel Sanchez, OCD Santa Fe
Mr. Glenn von Gonten, OCD Santa Fe
OCD Hobbs District Office

**OIL CONSERVATION DIVISION
H2S CONTINGENCY PLAN REQUIRED BY OCD RULE 18.18.11 NMAC**

DCP Midstream, L.P.
Eunice GP (H2S-942GW-016) Lee Co.
3/9/2014

Contingency Plan Requirements Checklist 18.18.11.2 (H2S) 18.18.11.3 (H2S)	Included?	Page in Document?	OCD Notes	Operator Response
Emergency Procedures				
Responsibilities & duties of personnel during emergency	N	23 (XII); 26 (XVI)	Ref. in sentence only, little or no details. Incl. Command Flow Chart with description usually included in this sec. Pg 26 indicates SCBA's are for escape purposes only. Who will respond to H2S detector alarms to investigate and undertake correction action(s) to protect public health?	
Immediate action plan	N	23 (XII); 17 (VI)	Documented and records filed in Carlsbad Asset Office? Under Defn. Of Oper. Chkpt. What is ref. to ERP instead of H2S CP?	
Evacuation and shelter in place plans	Y/N	19 (VII); 26 (XVI); 23 (XII)	A map is needed depicting last farms from pages at left w/ roadblock locations, shelters, routes of evacuation, etc. Why is ref. To Emerg. Respon. Plan instead of H2S CP? No details on shelter-in-place in plan.	
Telephone numbers of emergency responders	Y/N	24 (XIII); 25 (XIII)	Units may be outdated. It is not clear if these persons are trained to wear full SCBA to respond to investigate and take correction action(s) when H2S alarms go off to be an H2S task, etc.? Same with emergency resources on pg. 25	
Telephone numbers of public agencies	Y	25 (XIII)	Check for updates	
Telephone numbers of local government	Y	25 (XIII)	Check for updates	
Telephone numbers of appropriate public authorities	Y	25 (XIII)	Check for updates	
Location of potentially affected public areas Also see 19.15.11.12.B & C	N		No maps to determine ROE-ne extends into Public Areas with ESD locations?	
Location of potentially affected public roads	N		Map needed.	
Proposed evacuation routes, with locations of road blocks	Y	19 (VII); 26 (XVI); 28 (XVI)	No map. Display designated assembly areas during emergency.	
Procedures for notifying the public		37	Haz. Mts. Incl. Notific. Chkpt. Not completed.	
Availability and location of safety equipment and supplies Also see 19.15.11.12.C		18 (VII); 28 (XVI)	90 ppm (H2S) is too high to wait for evacuation. Map needed to display safety equipment.	
Characteristics of hydrogen sulfide and sulfur dioxide				
Discussion of characteristics		11-13 (II)		
Maps and Diagrams				
Area of exposure	Y/N	30 - 31	105,000 MCF at 6,500 ppm (H2S). Double check "worst case scenario" values based on current operating conditions.	
Public areas within area of exposure	N	29 (XVI)	No plans or maps in rpt. to verify, i.e., road blocks, sign, wind socks, ESDs, etc.	
Public roads within area of exposure	N	29 (XVI)	No plans or maps in rpt. to verify	
Training and Drills				
Training of personnel to include responsibilities, duties, hazards, detection, personal protection and contingency procedure	Y/N	18 (VII); 26 (XVI); 28 (XVI)	Flow charts w text displaying this info. needed. "Responsibilities", "Duties", is missing from the CP.	
Periodic drills or exercises that simulate a release	Y/N	23 (XII)	On pg. 23 instead of 16. Training for all affected DEFS personnel will be conducted prior to completion of the project and introduction of product. Training will then be given as needed for any personnel who may later be affected by this project.	
Documentation of training, drills, & attendance	Y	23 (XII)		
Training of residents on protective measures	Y/N	23 (XII); 26 (XVI)	Vague section lacking evic. & Shelter-in-place details w claims literature to be handed out to residents being trained. The Resident list pg 26 is empty, but should be checked annually in the CP. CP should state that there are no residents present within the ROE-ne DEFS PUBLIC AWARENESS BROCHURES WILL BE PRESENTED TO EACH RESIDENT LIVING WITHIN THE RADIUS OF EXPOSURE. A resident check should be conducted annually during the Annual Summer.	
Briefing of public officials on evacuation or shelter-in-place plans	N	23(XII); 26 (XVI); 27 (XVI)	No details of plans provided; resident list pg. 26 empty. Op indicates ERP implemented where CP not clear. Op appears to rely on unspecified ERP instead of H2S CP. Pg 27 refer. a "Public Awareness Brochure" that does not appear to be included in the CP. The brochure should be facility specific with evacuation/shelter in place guidelines for residents and/or the gen. public. "Poison Gas" signs are required to fulfill Part 11 Regulations. Maps should display where signs, road blocks, wind socks, ESDs, flare stack, etc. are located at the facility.	
Coordination with state emergency plans				
How emergency response actions will coordinate with OCD and the state police response plans	Y	17 (VI); 20 (IX)	ICS referenced in FEMA. Concerns about op. having trained staff to wear full SCBA to investigate alarm decisions to take CA to prevent catastrophic events. Where is IC Flowchart with text description of steps taken during emergency conditions.	
Activation Levels				
Activation Levels and description of events which may lead to a release in areas of activation level	Y/N	22 (X); 28 (XVI)	If hydrogen sulfide levels are detected at 90 ppm or above (seems too high to OCD), an evacuation alarm is sounded throughout the plant. Map displaying emergency shelters needed.	
Plan Activation				
Commitment to activate contingency plan whenever H2S concentration of more than 100 ppm in a public area or 500 ppm at a public road	Y	22(X)		
Commitment to activate contingency plan whenever H2S concentration of more than 100 ppm 3000 feet from the site of release	Y	22 (X)		
Miscellaneous				
Table of Contents Page Numbers	Y/N	16 (XII)	Some page nos. appear to be incorrect	
Duke Energy Field Services (DEFS)	Y/N	29 (OCD DQ2)	Should be DO1 in Hobbs (check contact info.) Term & Definition appears to be outdated	
Emergency Response Plan (ERP)			Op. appears to use in lieu of an H2S CP, which does not meet the regulatory requirements	
Signs	N	27 (XIV)	Poison Gas signs assoc. with gas gathering lines do not appear to have been emplaced at the facility and along four gas lines leading into the facility through roadway ROW, public areas, etc.	
Maps and Drawings	N	29 (XVII); 32; 33; 34; 35 & 36	Facility Plot Plans (see pg. 29 Sec. V(XII)) are missing from CP; maps ROE: Emergency Equipment Location Plan missing; H2S Alarm System Plan missing; Electrical Classification Drawing missing;	
Distribution List	Y/N	36	OCD District Office needs to be changed to "District 1" Hobbs	
Annual Inventory	N		Operator must fulfill 19.15.11.9 (ii) NMAC Annual Inventory in the CP	

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