

GW - 027

**H2S CONTINGENCY
PLAN**

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Wednesday, August 31, 2011 6:27 AM
To: 'Wrangham, Calvin W.'
Subject: Targa Saunders Gas Plant (GW-026) H2S Contingency Plan Review

Cal:

Re:

- **GW-026 Targa Saunders Gas Plant H2S CP**
 - On 8/19 began review of H2S CP received on 8/16 covering GWs 26 (Saunders GP) & 27 (Vada CS) and other non-permitted booster and compressor stations. Entered into tracking system and scanned into OCD Online. Ok.
 - On 9/1 developing draft letter to send operator for telephone conference call on OCD's preliminary review of H2S CP listed above. Ok.

Good morning. Glenn passed this along to me and if he does not get re-involved, we should be able to work something out.

First, I notice that the gas gathering lines entering into the Saunders GP include several booster and compressor stations. Many seem to be non-permitted. The big question for you on the gas gathering lines is how you monitor them to know when the "activation level" is reached to investigate a possible leak in a line segment? For example, is the complete line on a SCADA monitoring system with auto-pressure shut-off valves that activate automatically under certain flow and pressure conditions on the lines? Also, what triggers implementation of the H2S CP on the gas gathering lines? OCD is aware that the lines are not considered fixed facilities with H2S monitors, but there has to be a system that Targa uses that would satisfy these requirements of the H2S CP for the gas gathering lines.

Second, public training is required if there are any residences or public areas that may be encompassed by the ROEs on your map. The residences (if applicable) need to know exactly what would occur when the H2S CP is activated near the GP and along the gas gathering lines. For example, if residences smell a rotten egg odor, this should trigger a phone call to Targa and the activation level should apply to investigate the nature of the odor.....

I'm free to discuss your H2S CP on 9/1 and then I will be out of the office until next Wednesday, Sept. 7th.

Thank you.

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
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TARGA

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Certified Mail: 7008 1830 0004 2693 2276

August 8, 2011

Mr. Daniel Sanchez
Acting Division Director
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

RE: Targa Midstream Services Limited Partnership
Saunders Plant GW-026
Vada CS GW-027
H2S Contingency Plan

RECEIVED OGD
2011 AUG 12 P 2:11

Dear Sir:

Targa Midstream Services Limited Partnership received your letter addressed to Ms. Cindy Klein dated March 1, 2011 referring to Dynege Saunders Plant (GW-026).

Per notification on November 4, 2005 to Mr. Roger Anderson Environment Bureau Chief from Mr. Clark White Targa Vice-President the Saunders Plant is owned by Versado Gas Processors, L. L. C. and operated by Targa Midstream Services Limited Partnership.

After the effective date of March 2, 2003 of Rule 118 per NMAC 19.15.3.118 Dynege (former facility operator) submitted a Rule 118 CP per the rule to the Division. The CP was updated May 25, 2006 to reflect the operator name change to Targa.

Per your request please find enclosed a new CP per rule Title 19 Chapter 15 Part 11 dated January 18, 2011.

A separate notification was received referring to the Vada Gas Plant (GW-027) The Plant operations were shutdown in 1998 and the facility converted to a compressor station consisting of 2 generators and 3 gas compressors feeding inlet gas to the Saunders Plant. This compressor station and the others in the Saunders Plant gathering system are included in the Saunders Plant CP.

If you have any questions, or need additional information, please contact me at (432)-688-0542.

Sincerely,

Cal Wrangham
Targa ES&H Manager

cc: T. Jordan-Saunders Area Manager
C. Klein-ES&H Specialist
J. Keiser-Assistant Vice-President ES&H



TARGA

**HYDROGEN SULFIDE
CONTINGENCY PLAN**

for

**SAUNDERS PLANT (GW-026)
ASSOCIATED COMPRESSOR STATIONS
AND GATHERING SYSTEM**

**TITLE 19 NATURAL RESOURCES AND WILDLIFE
CHAPTER 15 OIL AND GAS
PART 11 HYDROGEN SULFIDE GAS**

**VERSADO GAS PROCESSORS, L. L. C.
operated by
TARGA MIDSTREAM SERVICES,
LIMITED PARTNERSHIP**

July 13, 2011

2011 AUG 12 P 2 11
RECEIVED 003

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1. INTRODUCTION

The Saunders Gas Plant, Associated Compressor Stations, and Gathering System consist of a natural gas processing plant and system which handles and/or generates hydrogen sulfide and/or sulfur dioxide; therefore this Hydrogen Sulfide Contingency Plan (H₂S Plan or Plan) has been developed:

1. to satisfy the New Mexico Oil Conservation Division Rule 11 (effective 12/08);
2. to conform with API "Recommended Practice for Oil and Gas Producing and Gas Processing Plant Operations Involving Hydrogen Sulfide," Recommended Practice 55 (reaffirmed 3/07); and
3. to create a site-specific hydrogen sulfide contingency plan that outlines the emergency response procedures that will be implemented to ensure a coordinated, efficient and immediate action Plan for alerting and protecting operating personnel and the public as well as to prevent or minimize environmental hazards and damage to property.

The terms used in this Plan are to be used in the same manner as defined in Title 19 Chapter 15 Part II of the New Mexico Administrative code (19.15.11.7- Definitions) unless otherwise defined herein.

1.1 SAUNDERS GAS PLANT, ASSOCIATED COMPRESSOR STATIONS, AND GATHERING SYSTEM DESCRIPTION

The Saunders Gas Plant is located 11 miles west on Highway 82 and 11 miles north on Highway 457 from Lovington, Lea County, New Mexico. It is owned by Versado Gas Processors, LLC and operated by Targa Midstream Services, Limited Partnership.

More specifically, the Plant is located in Section 34, Township 14S, Range 33E in NMPM, Lea County, New Mexico.

1. Plant approximate coordinates are:
Latitude: 33° 3' 21.96" N Longitude: 103° 36' 7.98" W
2. Plant physical address is:
11 miles W on Hwy 82 and 11 miles N on Hwy 457
Lovington, New Mexico
3. Plant mailing address is:
P. O. Box 1689
Lovington, New Mexico 88260
4. Driving Directions from Lovington, New Mexico to the Plant:

From the intersection of Main Street and Avenue D (New Mexico Highway 82), travel west on Highway 82 (approximately 11 miles) to the intersection of US Hwy 457. Travel north on Highway 457 (approximately 11 miles). Turn left onto County Road 117 and travel west approximately 0.5 mile to the entrance to the Saunders Gas Plant.

The location of the Plant is illustrated herein on Figure 1.

**Figure 1
Saunders Gas Plant**

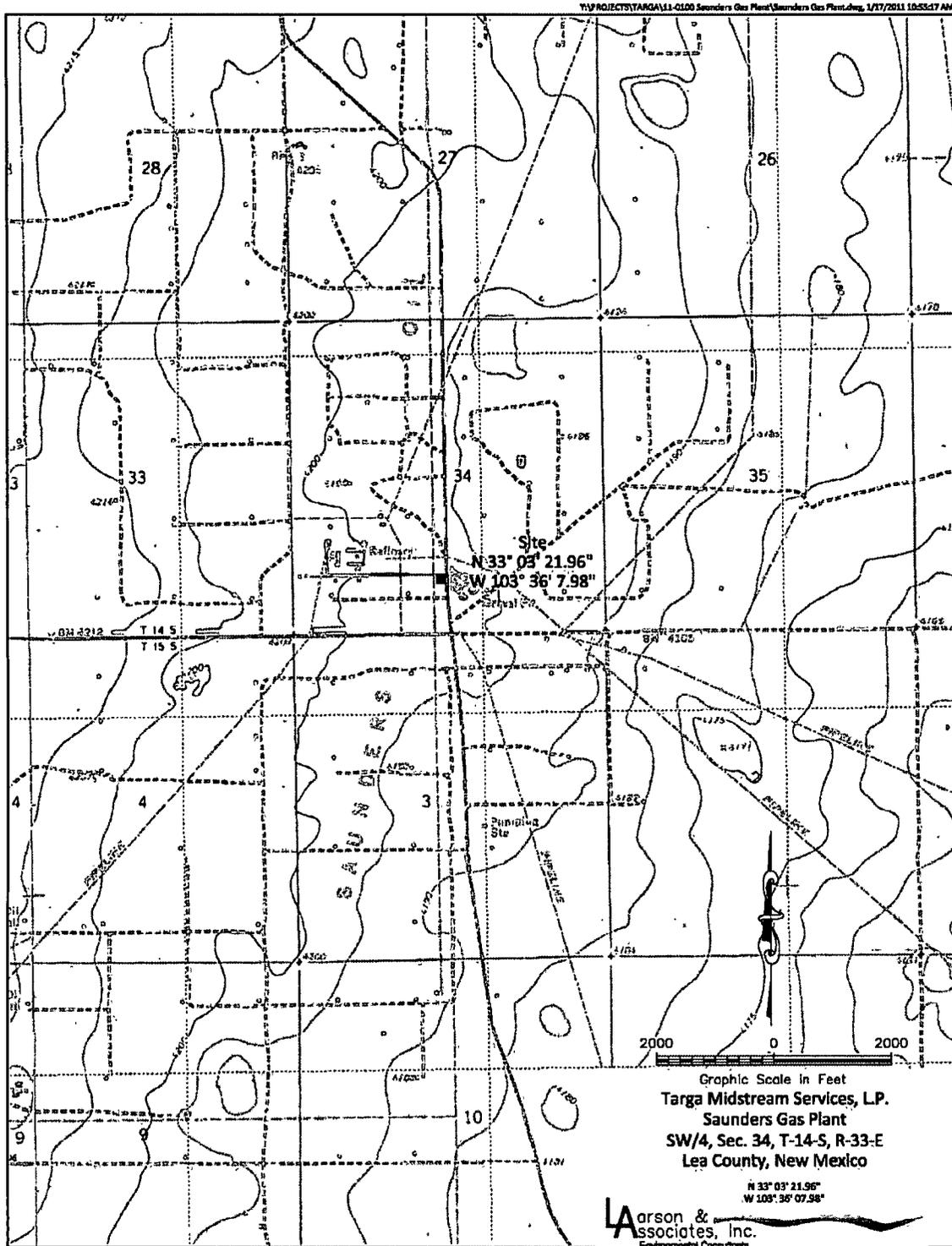


Figure 1 - Topographic Map

Associated Compressor Stations and Gathering System are provided in detail in Appendix C. Specifically, natural gas converges to the Saunders Gas Plant through a series of lines, compressors and/or booster stations. For illustration, one of the compressor stations, Vada Compressor Station is located approximately 27 miles north from the Saunders Plant in Section 23, Township 10S, Range 33E in NMPM, Lea County, New Mexico.

1. Vada Compressor Station approximate coordinates are:

Latitude: 33° 25' 59.60" N Longitude: 103° 32' 45.95" W

2. Vada Compressor Station driving directions from Tatum, New Mexico to the Compressor Station:

Proceed west on Highway 380 approximately 15 miles to Highway 457 (Nine Mile Ranch Road). Turn right, heading north, onto Highway 457 and proceed north to Epperson Road (pavement ends). Proceed north for approximately 3.3 miles to plant on east side of road.

Gathering System and Compressor Stations' locations are provided in detail in Appendix C.

The lines follow a circular layout: from the Vada Compressor Station northeast, approximately 20 miles, to the Bluitt Booster Discharge area, following a southward projection of approximately 40 miles through the Gladiola/King Lines to the Dean Caudill Booster Station area approximately nine miles southwest to Townsend Booster. Lines project from the Townsend Booster northwest to the Saunders Plant.

1.2 DESCRIPTION OF OPERATIONS

1. The Plant operations include gas processing, conditioning and compression, as well as flow lines and storage tanks. The Plant gathers and processes produced natural gas from Lea and Eddy Counties, New Mexico via a pipeline system and compressor stations. Once gathered at the Plant, the produced natural gas is compressed; treated in an amine process for the removal of carbon dioxide and hydrogen sulfide; and dehydrated to remove the water content. The processed natural gas and recovered gas liquids are sold and shipped to various customers.
2. Because the natural gas that is gathered at the Plant contains hydrogen sulfide, it must be treated or processed to remove these and other impurities. The carbon dioxide and hydrogen sulfide (H₂S) stream that is removed from the natural gas in the amine treating process is sent to the sulfur recovery unit whereby sulfur is removed, which results in the generation of molten elemental sulfur.

2. THE PLAN

2.1 RESPONSIBILITY FOR CONFORMANCE WITH THE H₂S PLAN

It is the responsibility of all personnel on-site to follow the safety and emergency procedures outlined in the Hydrogen Sulfide Contingency Plan (the H₂S Plan) as well as the following documents:

- Targa Midstream Safety & Health Manual;
- Targa Midstream Saunders Plant Emergency Response, Groundwater Discharge Plan and Oil Spill Contingency Plan; and
- Targa Midstream Environmental Policies and Programs.

2.2 REVISIONS TO THE PLAN

The H₂S Plan will be reviewed annually and revised as necessary to address changes to the Plant facilities, operations, or training requirements, contact information and the public areas including roads, businesses, or residents potentially affected by the operations of the Plant, specifically those areas within the radii-of-exposure.

2.3 AVAILABILITY OF THE H₂S PLAN

The H₂S Plan shall be available to all personnel responsible for implementation, regardless of their normal location assignment. A copy of the Plan will be maintained at the Plant in the Area Manager's office, control room and all Plant Supervisors. See Appendix A for the H₂S Distribution List, which lists all the additional entities that have been provided a copy of the H₂S Plan.

2.4 CONTENT OF THE PLAN

At a minimum, the H₂S Plan will contain information regarding:

1. The emergency procedures to be followed in the event of an H₂S or SO₂ release that may pose a threat to the Plant, public or public areas;
2. The characteristics of H₂S and SO₂;
3. A facility description, map and/or drawings; and
4. Information regarding training and drills to be conducted related to this Plan.

3. PLAN DESIGN CONSIDERATIONS

3.1 CHARACTERISTICS OF H₂S, SO₂ AND CARBON DIOXIDE

3.1.1 Hydrogen Sulfide (H₂S)

The proposed inlet gas streams into the Plant will contain approximately 4,300 ppm (or 0.43 mole percent) of hydrogen sulfide based on data generated from the sampling of the inlet gas on weekly monitoring.

Hydrogen sulfide is a colorless, toxic and flammable gas, and has the odor of rotten eggs. Hydrogen sulfide gas is heavier than air.

Hydrogen sulfide presents a significant health hazard by paralyzing the respiratory system resulting in serious injury or death.

Hydrogen Sulfide Properties & Characteristics	
CAS No.	7783-06-4
Molecular Formula	H ₂ S
Molecular Weight	34.082
TWA	10 ppm
STEL	15 ppm
IDLH	100 ppm
Specific Gravity (air = 1.0)	1.189
Boiling Point	-76.5°F
Freezing Point	-121.8°F
Vapor Pressure	396 psia
Auto Ignition Temperature	518°F
Lower Flammability Limit	4.3%
Upper Flammability Limit	46.0%
Stability	Stable
pH in Water	3
Corrosivity	Reacts with metal, plastics, tissues & nerves

Physical Effects of Hydrogen Sulfide		
Concentration		Physical Effect
ppm	%	
1	.00010	Can be smelled (rotten egg odor)
10	0.0010	Obvious & unpleasant odor; Permissible Exposure Limit; Safe for 8-hour exposure
15	0.0015	Short Term Exposure Limit (STEL); Safe for 15 minutes of exposure without respirator
50	0.0050	Loss of sense of smell in 15 minutes
100	0.0100	Immediately Dangerous to Life & Health (IDLH); Loss of sense of smell in 3-15 minutes; Stinging in eyes & throat; Altered breathing
200	0.0200	Kills smell rapidly; Stinging in eyes & throat
500	0.0500	Dizziness; Unconscious after short exposure; Need artificial respiration
700	0.0700	Unconscious quickly; death will result if not rescued promptly
1,000	0.1000	Instant unconsciousness; followed by death within minutes

3.1.2 Sulfur Dioxide (SO₂)

Sulfur dioxide is produced as a by-product of H₂S combustion. The waste gas stream consisting of hydrogen sulfide and carbon dioxide is routed to the plant acid gas flare during abnormal conditions when the sulfur recovery unit is out of service. Waste gas is routed to the acid gas flare during maintenance operations.

It is colorless, transparent, and is non-flammable, with a pungent odor associated with burning sulfur.

Sulfur dioxide is heavier than air, but will be picked up by a breeze and carried downwind at elevated temperatures. Sulfur dioxide can be extremely irritating to the eyes and mucous membranes of the upper respiratory tract.

Sulfur Dioxide Properties & Characteristics	
CAS No.	7446-09-5
Molecular Formula	SO ₂
Molecular Weight	64.07
TWA	2 ppm
STEL	5 ppm
IDLH	100 ppm
Specific Gravity (air = 1.0)	2.26
Boiling Point	14°F
Freezing Point	-103.9°F
Vapor Pressure	49.1 psia
Auto Ignition Temperature	N/A
Lower Flammability Limit	N/A
Upper Flammability Limit	N/A
Stability	Stable
Corrosivity	Could form an acid rain in aqueous solutions

Physical Effects of Sulfur Dioxide	
Concentration	Effect
1 ppm	Pungent odor, may cause respiratory changes
2 ppm	Permissible exposure limit; Safe for an 8 hour exposure
3-5 ppm	Pungent odor; normally a person can detect sulfur dioxide in this range
5 ppm	Short Term Exposure Limit (STEL); Safe for 15 minutes of exposure
12 ppm	Throat irritation, coughing, chest constriction, eyes tear and burn
100 ppm	Immediately Dangerous To Life & Health (IDLH)
150 ppm	So irritating that it can only be endured for a few minutes
500 ppm	Causes a sense of suffocation, even with first breath
1,000 ppm	Death may result unless rescued promptly.

3.1.3 Carbon Dioxide

The current inlet gas streams to the Plant contain approximately 1.5% carbon dioxide based on an inlet sample collected on December 29, 2010.

Carbon dioxide gas is colorless, odorless, and non-flammable. Carbon dioxide is heavier than air.

Carbon Dioxide Properties & Characteristics	
CAS No.	124-38-9
Molecular Formula	CO ₂
Molecular Weight	44.010
TWA	5,000 ppm
STEL	30,000 ppm
IDLH	40,000 ppm
Specific Gravity (air = 1.0)	1.5197
Boiling Point	-109.12°F
Freezing Point	-69.81°F
Vapor Pressure	830 psia
Auto Ignition Temperature	N/A
Lower Flammability Limit	N/A
Upper Flammability Limit	N/A
Stability	Stable
pH in saturated solution	3.7
Corrosivity	dry gas is relatively inert & not corrosive; can be corrosive to mild steels in aqueous solutions

Physical Effects of Carbon Dioxide	
Concentration	Effect
1.0 %	Breathing rate increases slightly
2.0 %	Breathing rate increases to 50% above normal level. Prolonged exposure can cause headache, tiredness
3.0 %	Breathing rate increases to twice normal rate and becomes labored. Weak narcotic effect. Impaired hearing, headache, increased blood pressure and pulse rate
4 – 5 %	Breathing increases to approximately four times normal rate, symptoms of intoxication become evident, and slight choking may be felt
5 – 10 %	Characteristic sharp odor noticeable. Very labored breathing, headache, visual impairment, and ringing in the ears. Judgment may be impaired, followed within minutes by loss of consciousness
10 – 100 %	Unconsciousness occurs more rapidly above 10% level. Prolonged exposure to high concentrations may eventually result in death from asphyxiation

3.2 RADII OF EXPOSURE (ROE)

For the existing operations, the Radius of Exposure for both 500-ppm and 100-ppm of H₂S gas was determined using the Pasquill-Gifford derived equation, as defined by NMAC, which uses the maximum daily rate of the gaseous mixture that is handled by the Saunders Gas Plant.

The rates and other variables used to calculate the ROE is discussed in greater detail in **Appendix B - ROE calculations. Also refer to Appendix C - map showing 500-ppm ROE and the 100-ppm ROE.**

500 ppm ROE – public road	1,447 feet
100 ppm ROE – public area	3,167 feet

4. EMERGENCY ACTION PROCEDURES

4.1 EMERGENCY RESPONSE ORGANIZATION

The Plant uses the Incident Command System (ICS) for emergency response. The ICS structure used is based on the National Interagency Incident Management System (NIIMS), and is consistent with the National Contingency Plan (NCP).

In the event of an accidental release that results in the activation of the H₂S Plan and all personnel have been evacuated out of the affected area, the Area Manager, or his designee, will be the On-Scene Incident Commander (IC in this Plan). Upon notification of an emergency the Area Manager or his relief will serve as the Field Incident Commander (FIC). Under certain conditions, the New Mexico State Police responding to the emergency may elect to assume the position of FIC or they may establish a Unified Command of which the Targa Area Manager may be a key member. The responsibility of the FIC is to ensure control of the emergency incident. The IC will contact and coordinate with Targa's management in corporate office.

The Area Manager or his designee shall determine:

1. Plant Shutdowns;
2. Isolation of pipeline segments; and
3. Repairs, tests or restarts as required.

If an emergency occurs, the Area Manager, or his designee, shall be notified first. The Area Manager, or his designee, shall notify Targa's Office in Midland, Texas. If any person in this chain of command is unavailable, the Targa employee shall elevate the communication to the next level.

4.2 EMERGENCY RESPONSE

This section explains the procedures and decision to be used in the event of an H₂S release; much of which has been pre-determined to ensure a coordinated, efficient and immediate action Plan for alerting and protecting operating personnel and the public as well as to prevent or minimize environmental hazards and damage to property.

4.2.1 Objective

All Area employees shall be prepared to respond to an H₂S or SO₂ emergency at the Plant, Associated Compressors, and Gathering System lines. Emergency response actions may be taken for a variety of situations that may occur in the Plant. The Plan is activated based on the concentration of H₂S that has been released.

- Plant - Emergency alarm sounded and/or flashing red beacons activated for H₂S greater than 10 ppm,

- 100 ppm in any public area, or
- 500 ppm at any public road, or
- When a 100 ppm ROE is greater than 3,000 feet from the site of the release.

As soon as the Plan has been activated, based on the criteria above, the Area Manager, or his designee, shall be notified. In the absence of the Area Manager or his relief the Targa employee (first responder) at the site shall assume the role of FIC and determine whether or not to activate the Contingency Plan. It is the responsibility of the FIC to ensure control of the emergency response management system and if necessary to coordinate these efforts with any state or local emergency plans.

4.2.2 Evacuation and Emergency Assembly Areas

Evacuation to the assembly point for all visitors and Plant personnel begins when the emergency alarm is activated. After assembly, if necessary, the Plant operators are to put on the 30-min SCBA to rescue any personnel that are in distress and assist any distressed personnel in evacuating to Emergency Assembly Area 1.

Emergency services (911) will be contacted if there are injuries or as otherwise deemed necessary. The operators will then, wearing the SCBA, investigate the cause of the release. At the sound of the alarm and/or flashing red beacons, all other personnel in the Plant are to stop work, check the prevailing wind direction and immediately proceed along designated evacuation routes and/or upwind to the pre-designated Emergency Assembly Area (Change Room Building) as shown in Appendix D.

Prevailing winds for the area are from the south. Personnel should evacuate along the designated route unless the designated evacuation route is downwind of the release (based on the windsock), then all evacuees should proceed upwind to the Emergency Assembly Areas.

The Plant shows evacuation routes to be determined on wind direction and windsocks.

<p>Emergency Assembly Area Change Room Building of the Plant Main Office Building of the Plant See Appendix D</p>
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Roll call shall be conducted at the Emergency Assembly Area to assure all personnel have evacuated safely. This facility requires all visitors check in before entering the Plant, thus the check-in sheet will be used at the Emergency Assembly Areas to make a full accounting of all personnel and visitors.

4.2.3 Immediate Action Plans/Initial Responses

Targa Plant Operators are authorized to elevate the level of response based on observed conditions if a lower level response may not be effective in protecting personnel, the public or the environment.

The following outlines the immediate action Plan. This is to be used when responding to an H₂S release occurring at the Plant, acid gas pipeline or the acid gas well. Additional or long term response actions will be determined on a case-by-case basis, if needed, once the Incident Command Center and System is established following the immediate response.

Some steps may be taken simultaneously.

- A. Request assistance, if needed.
 - 1. Alert and account for facility personnel
 - 2. Move away from the source and get away from the affected area
 - 3. Don personal protective breathing equipment
 - 4. Alert other affected personnel
 - 5. Assist personnel in distress
 - 6. Proceed to the designated emergency assembly area
 - 7. Account for on-site personnel

- B. Take immediate measures to control the presence of or potential H₂S discharge and to eliminate possible ignition sources. Emergency shutdown procedures should be initiated as deemed necessary to correct or control the specific situation. When the required action cannot be accomplished in time to prevent exposing operating personnel or the public to hazardous concentrations of H₂S, proceed to the following steps, as appropriate for the site-specific conditions.

- C. Alert the public (directly or through appropriate government agencies) that they may be subjected to an atmosphere exceeding 30 ppm of H₂S. Initiate evacuation of those within the exposure area.

- D. Contact the Area Manager or first available person on the call list. Notify them of the circumstances and whether or not immediate assistance is needed. The Area Manager should notify (or arrange for notification of) other supervisors and other appropriate personnel (including public officials) on the call list, as necessary.

- E. Cordon off the exposure area to prevent entry, make recommendations to public officials regarding blocking unauthorized access to the unsafe area, and assist as appropriate. Make recommendations to public officials regarding evacuating the public and assist as appropriate.

- F. Notify, as required, state and local officials and the National Response Center to comply with release reporting requirements.
- G. Monitor the ambient air in the area of exposure (after following abatement measures) to determine when it is safe for re-entry.
- H. Return the situation to normal.

4.2.4 Expansion on Immediate Action Plan

The following discussion expands on the emergency actions in the order in which they were previously listed. Ideally, some of these actions, after the first, will be performed simultaneously. There may be situations where actions must be performed in a different sequence from those listed. The employee first knowing about the potential hazard (First Responder) will take the first action(s). Subsequent actions will generally be taken by or assisted by those dispatched to help.

A. Request Assistance if Needed

Any employee who finds himself in an emergency situation involving the escape of hydrogen sulfide gas that would pose a hazard to the public shall notify the Area Manager, or his designated alternate, by the fastest means. The employee will advise the Area Manager, or alternate, of the location and nature of the emergency and the assistance needed. He will also state the actions taken and those he will be taking while waiting for assistance. The Area Manager is directly responsible for requesting the assistance needed. He will also proceed with the appropriate notifications. Please refer to Appendix B of this Plan for a list of emergency telephone numbers.

B. Stop the Escape of Hydrogen Sulfide

Isolate the leak by closing the upstream and downstream valves. If necessary, initiate emergency shutdown (ESD) procedures for the equipment.

C. Alert the Public and Evacuate Those Within the Exposure Area

Alert all persons who are within the exposure area. Refer to the map and list of ROEs in Appendix C. In the event a leak causes a potentially hazardous volume public, notification must be made immediately by the employee who discovers (or arrives first at the leak site) and judges the situation serious enough to require immediate evacuation. If it is determined that the notification proceeding shall not be immediate the Area Manager is the designated employee to initiate evacuations. Whether by the first person at the scene or by the Area Manager, notification to the public shall be made by the fastest possible means.

In the event that complete or partial evacuation becomes necessary, evacuation must be confirmed by personal observations, which should include repeat visits to the area to confirm that persons have not entered the evacuated area. If evacuation is deemed

prudent, advise persons and/or assist them to leave the area without delay by the fastest, safest route out of the exposure area. In populated areas such as the City of Lovington, evacuations will be conducted by city officials with the aid of Targa employees, if requested.

- First, evacuation should be from the 500 ppm exposure area, giving priority to the downwind position.
- Next, evacuate those within the potential exposure area, giving priority to the downwind position.
- Monitor ambient hydrogen sulfide concentrations in adjacent areas to ensure that any exposed residents are evacuated.
- Always wear a breathing apparatus.

D. Contact the Area Manager

The Targa employee (first responder) responding to or receiving notification of an emergency situation shall immediately proceed to the location and attempt to assess the situation, notify the Area Manager or his relief, and take the following actions:

- Provide the Area Manager with as much data possible concerning the location, the extent of emergency and need for additional assistance.
- Warn others in the area of situation, evacuate if necessary.
- Remain at the site, at a safe distance, and available for communication. Wait for assistance to arrive before attempting to enter into any potentially hazardous area.
- Initiate rescue and first aid as the situation dictates.

E. Cordon off the Exposure Area to Prevent Entry and/or Make Barricade and Evacuation Recommendations

Place barricades outside the area of exposure on all routes to prevent entry into the area. Barricades must be manned by Targa and/or law enforcement personnel to prevent entry. The persons manning the barricades must be equipped with a protective breathing apparatus, hydrogen sulfide measuring devices, and two-way radios or cell phones. Barricades should be placed a safe distance away from the potential exposure area and should be monitored for Hydrogen Sulfide.

Based on all information available and the calculated potential exposure information listed in Appendix B, make recommendations to public officials for the strategic placing barricades, for evacuating the public, and assist as needed. Priority should be given to those areas in the 500 ppm radius of exposure, then the 100 ppm radius of exposure, with consideration given to the wind direction. Proper caution should be used for shifting changes in wind direction.

F. Complete Notifications as Required

Generally, some notifications will have been made under Steps A or D. Any of the following notifications that were not made must be made as soon as possible. Normally the Region ES&H Advisors will complete the agency notifications.

- Complete the chain of notification within the company.
- The local public safety officials not already notified who need to be aware of the situation.
- New Mexico Oil Conservation Division – Notification to the OCD should be made as soon as possible, but must be made no more than 4 hours after a Plan evacuation. A full report of the incident must be submitted to the Division on Form C-141 no later than 15 days following the release.
- Environmental Protection Agency Regional Office.

G. Monitor for Safe Re-entry

As soon as the complete and permanent stoppage of the release is confirmed, begin monitoring evacuated areas for hydrogen sulfide and combustible gas concentrations. Monitor the ambient air in the area of exposure only after following abatement measures, to determine when it is safe for re-entry.

H. Return of the Situation to Normal

No re-entry will be allowed until ambient conditions have been assessed and verified. Communications for re-entry should be coordinated through the Area Manager assuming the role of Field Incident Commander (FIC). When total absence of hydrogen sulfide and combustible gas is confirmed throughout the evacuated area, notify the sheriff's office so that they may be informed of the situation. Advise all parties previously notified that the emergency has ended.

4.2.5 Post-Emergency Actions

In the event this plan is 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 to assure that any future activation will be as effective as possible:

- Clean up, recharge, restock, repair, and replace emergency equipment, as necessary, and return it to its original location.
- Critique all actions and procedures, providing additional training to employees if need is indicated. Modify contingency plan, if necessary.
- Review the cause of the emergency and modify operating maintenance and other surveillance procedures, if needed.

- Ensure all agency notifications have been completed and follow-up with any written notification requirements.
- Ensure all previously notified or evacuated persons have been advised that the emergency situation has ended.

4.3 EMERGENCY SHUT DOWN SYSTEM

The Plant has extensive Emergency Shutdown (ESD) and Process Shutdown (PSD) systems designed to isolate out-going gas and product streams releases, containing hydrocarbon and H₂S, and safely depressurize equipment to flares. These systems are automatically and manually initiated, depending on process conditions. There are manually activated ESD buttons located at exit locations at the Plant. A diagram is presented in Appendix D.

4.4 NOTIFICATION AND REPORTS

The Plant has various notification and reporting obligations. Some are related to its state air quality permit that is overseen by New Mexico Environmental Department (NMED) as well as well as state and federal spill reporting obligations. In addition to the regulatory obligations noted above, Plant personnel also have internal and external notification and reporting obligations associated with the activation of this Plan.

The New Mexico Oil Conservation Division (NMOCD) will be notified as soon as possible but no later than 4 hours following a release of H₂S requiring activation of this Plan. This shall be followed up with a full report of the incident using the NMOCD's C-141 form, no later than 15 days following the release.

4.4.1 Discovery and Internal Reporting

All Plant personnel who perform operations, maintenance and/or repair work within the Plant must wear H₂S monitoring devices to assist them in detecting the presence of unsafe levels of H₂S. When any personnel, while performing such work, discovers a leak or emission release they are to attempt to resolve the issue as long as H₂S levels remain below 10 ppm. The personal monitoring devices they wear will give off an audible alarm at 10 ppm.

If the response action needed to resolve the issue is more than simply closing a valve or stopping a small leak, personnel shall notify the Area Manager, or his designee and convey, at a minimum, the following information:

- Name, telephone number, and location of person reporting the situation; and
- Type and severity of the emergency; and

- Location of the emergency (area/block, mile markers, latitude & longitude, or building), and the distance to surrounding equipment and/or structures; and
- The cause of the spill or leak, name and quantity of material released, and extent of the affected area including the degree of environmental hazard; and
- Description of injuries and report of damage to property and structures; and
- Initiate and maintain a Chronological Record of Events log. This record should record the time, date, and a summary of the event.

If personnel detect H₂S levels greater than 10 ppm either as a result of his/her personal monitoring device or hearing the emergency alarm, Plant operators are to contact their immediate supervisor for assistance and put on the 30-min SCBA for rescue if necessary.

All non essential persons shall be notified of the release and evacuated from the area. Responding operators wearing the SCBAs are to first assist any persons requiring assistance during the evacuation, then attempt to resolve the issue. The Plant operator is then responsible for notifying the Area Manager or his designee so that the IC system can be implemented and H₂S Plan activated if necessary.

Once the Area Manager is contacted, he or his designee is to notify the appropriate corporate management, EHS personnel, Plant emergency response personnel, and advise them of the existing emergency situation. Corporate management will then conduct the reporting up that is necessary based on the situation.

Plant personnel are to advise any contractor, service company, and all others on-site or attempting to enter the Plant that the H₂S Plan has been activated.

4.5 PUBLIC AWARENESS AND COMMUNICATION

Public awareness and communication is a primary function of the H₂S Plan. The Company has compiled a list of various public, private, state and local contacts that are to be notified at various phases during the activation of the Plan. Refer to the Emergency Notification List in Appendix E that indicates when certain entities are to be contacted in event of activation of this Plan.

Company will inform all state and local response organizations of its Plan as well as those businesses that fall within its 500-ppm and 100-ppm ROE as illustrated in Appendix C.

4.5.1 Public Areas, Nearby Businesses and Residents

The contact information for local and state agencies and contractors is contained in Appendix F. All entities within the 500 ppm and 100 ppm radius of exposure will be contacted by Plant personnel as designated by Area Manager if the Plan is activated and based on response level as described in the Immediate Action Plan and advised of the following:

- The nature and extent of the release/emergency at the Plant, acid gas pipeline or acid gas well and recommendations for protective actions, such as evacuation or shelter-in-place;
- Any other event specific information that is necessary to protect the public; and
- Updates as to the status of the release and continued safety measures to be taken, including but not limited to when to evacuate and/or when it is safe to return to the area.

4.5.2 Residences or Public Roads

Public County Road 117 and HWY 457 are within the 100 ppm radius of exposure, along with several county and lease roads. Several residences are included within the 100 ppm radius of exposure.

4.5.3 Businesses or Other Public Areas

All businesses included within the ROE will be provided with a copy of the H₂S Plan and will be contacted about participation when local emergency response training events or drills occur.

4.6 SITE SECURITY

- A. In order to have an accurate listing of all personnel on-site in the event of an emergency, a daily sign-in log sheet shall be utilized. The sign-in log sheet shall include at a minimum the person's name, the company name, the time of arrival, and the time of departure.
- B. The Incident Commander shall be responsible to assure that all personnel sign-in upon arrival and sign-out upon departure from the job site.
- C. The Incident Commander may at his discretion assign the responsibilities for the daily sign-in log sheet to the individual designated as the Record Keeper or another designee.
- D. At the discretion of the Incident Commander, a security coordinator and/or a security team may be established, and the access to the job site restricted.

E. Road blocks will occur as outlined in the Response Level detail for the Plant, road crossing, pipeline, or acid gas well sites.

4.7 SIGNS & MARKERS

The Plant has numerous warning signs indicating the presence of H₂S/Poisonous Gas and high pressure gas at the entrance to the Plant and along pipeline right away. Emergency response phone numbers are posted at the entrance to the Plant and acid gas well. Acid gas pipeline markers also include emergency response numbers.

Signs are located at the Plant and acid gas well gate entrances indicating that all visitors are to sign in at the Plant office.

4.8 FIRST AID STATION

The first aid station will be located at the Emergency Assembly Area.

FIRST AID KITS are located:
Plant Office Building Change Room Building Each Company Vehicle

4.9 MEDIA SITE

At no time shall any unescorted representative from the media be allowed in the Plant, unless approved by the Incident Commander and the Safety Officer has approved their entry.

Media personnel shall not be allowed to enter Targa Midstream property without the approval of Targa Midstream Area Manager or his designee, and shall be escorted by Targa Midstream personnel at all times.

All media inquiries should be directed to Corporate Communications in Houston. The FIC or his designee will provide Corporate Communications with periodic updates and will take their direction with regard to any onsite communication with the media.

5. TRAINING/DRILLS/EDUCATION

5.1 TRAINING

Targa recognizes that the most critical portion of this plan is Emergency Procedures. To ensure the most effective implementation of these procedures, pre-emergency measures shall be completed to attain a state of preparedness. These actions are as follows:

- Every employee is to be completely familiar with the contents and location of the contingency plan.
- Surveillance and preventative maintenance to minimize the possibility of an accidental release of gas.
- Training and drills will be conducted as further described below.
- All emergency breathing equipment is maintained and ready for use.
- This Plan is made available to appropriate public response officials and shall be reviewed and discussed thoroughly with the City of Lovington emergency response officials.
- Targa will use brochures, public notices, or other means, as deemed appropriate and practical, to alert and educate any persons who reside within the potential areas of exposure.

All training records for the Plant are maintained at the Plant. The following is a limited list and summary of the training programs that relate to the H₂S Plan and Emergency Response:

Plant Orientation Training - All Plant personnel, visitors, and contractors must attend a Plant overview orientation prior to obtaining permission to enter the Plant. A refresher course on this training is required annually for all persons. This training also complies with the requirements of the Targa Safety Standards Manual.

Hydrogen Sulfide and Sulfur Dioxide Training – All Plant personnel receive annual refresher training on hydrogen sulfide and sulfur dioxide, which is conducted by the Targa Training Group. If an individual is unable to attend, they may be required to attend a third party training session. All contract employees working in the facilities are required to have had hydrogen sulfide training and to provide the Plant a copy of their certification card prior to obtaining permission to enter the Plant.

Respirators - All Plant personnel are trained annually on the proper use of SCBA respirators. In addition to the annual training, all Plant personnel are fit tested annually on the respirators per OSHA Rules.

Hazard Communication - All Plant personnel are trained annually on Hazard Communication and SARA Title III Right-to-Know information. The annual training includes, at a minimum, a review of material safety data sheets (MSDS) for those materials that are present at the Plant and labeling.

Personal Protective Equipment (PPE) - All Plant personnel are trained annually on the Targa requirements for personal protective equipment (PPE). The training includes, at a minimum, a review of all the types and levels of personal protective equipment and how to select the correct equipment for the job.

5.2 EMERGENCY RESPONSE DRILLS

The Plant will conduct, at least, a tabletop drill annually. Multiple drills during the year may be scheduled at the discretion of the Area Manager or as part of the Emergency Response Agencies.

The annual drill will exercise this Plan and include, at a minimum, contacting the entities that are identified as being within the 500-ppm ROE and the Local Emergency Response contacts. The drills will also include briefing of public officials on issues such as evacuation or shelter-in-place plans.

Drill training will be documented and those records will be maintained at the Plant. The documentation shall include at a minimum the following:

- Description or scope of the drill, including date and time;
- Attendees and Participant to the drill;
- Summary of activities and responses; and
- Post drill de-brief and reviews.

New Mexico Oil & Gas Conservation Division, Santa Fe, NM

New Mexico Oil & Gas Conservation Division, Hobbs, NM

Lovington Fire Department

Lea County Local Emergency Planning Committee

Lovington Police

Tatum Police

Tatum Fire Department

Saunders Gas Plant Supervisors

Saunders ES&H Specialist

Control Room

Targa Midstream Office (Midland, TX)

The formulas for calculating the two ROEs (as specified by OCD Rule 118, Pasquill-Gifford Equation) are as follows:

500-ppm RADIUS OF EXPOSURE CALCULATION

$$X = [(0.4546)(\text{hydrogen sulfide conc.})^{(0.6258)}(Q)]$$

100-ppm RADIUS OF EXPOSURE CALCULATION

$$X = [(1.589)(\text{hydrogen sulfide conc.})^{(0.6258)}(Q)]$$

Where:

X = Radius of exposure in feet

Hydrogen Sulfide Concentration = Decimal equivalent of mole or volume fraction of hydrogen sulfide in the gaseous mixture

Q = Escape rate expressed in cubic feet per day (corrected for standard conditions of 14.73 psi absolute and 60 degrees Fahrenheit)

- For existing facilities or operations, the escape rate (Q) is the maximum daily rate of the gaseous mixture produced or handled or the best estimate thereof. For the Lovington Plant, the Company is using for contingency planning purposes an “escape rate” equal to the anticipated (maximum) inlet gas volume of 57,455 MSCFD. The (actual) inlet gas volume at the Plant will be somewhat variable and is continuously metered. The assumed 57,455 MSCFD inlet gas volume has been selected as the “escape rate” because it is the highest anticipated inlet volume that the Plant would handle under its proposed operations and is considered worst case interpretation of the volume of gas. It should be noted that the plan will remain effective as long as the processed volume and H₂S content equate to the same ROE. As addressed below.
- As to hydrogen sulfide concentration of the inlet gas, daily monitoring data of current operations indicates variable concentrations, but concentration will not exceed 4,300 ppm or 0.43 mole percent. Therefore, 4,300 ppm or 0.43 mole percent has been used in the worst case scenario for contingency planning purposes.

500-ppm ROE = 1,447 feet

100-ppm ROE = 3,167 feet

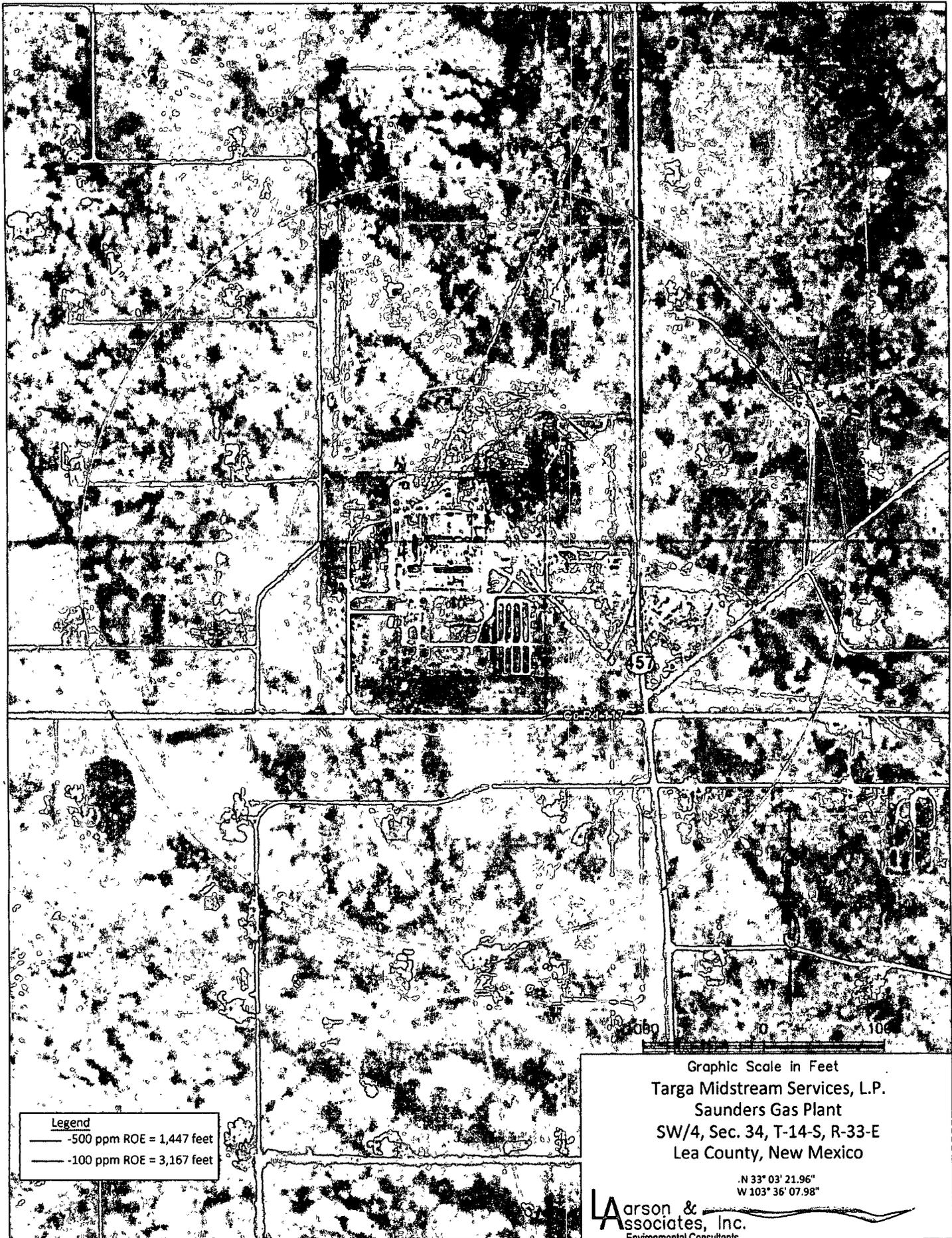


Figure 2 - Radius Of Exposure

COMPANY PERSONNEL

Call the following persons in the order listed until one is notified of the emergency:

1. Area Management

Saunders Plant

Tim Jordan, Area Manager

Office 575-396-3221, ext. 31

Mobile 575-631-7091

Home 575-396-0189

Alternate:

Ralph England, Field Supervisor

Office 575-396-3221, ext. 24

Home 575-760-3407

Mobile 575-441-4653

2. ES&H Group

Cal Wrangham, ES&H Manager

Office 432-688-0542 Midland, TX

Home 432-697-6580 Midland, TX

Mobile 432-425-7072

Cindy Klein, ES&H Compliance Specialist

Office 575-396-3221, ext. 38

Home 575-398-6670

Mobile 575-631-7093

3. Region Manager

Clark White, Permian Basin Region Manager

Office 713-584-1525 Houston, TX

4. Field Operators

Lovington Area

Alfredo Corral	575-631-1432
Tomas Espinoza	575-607-7307

Call company support personnel in Houston, TX, as needed:

Assistant V-P ES&H

Jessica Keiser	713-584-1084
Cell Phone	832-603-2277

Corporate Security

Weldon Green	713-584-1301
Cell Phone	281-802-5351

LAW ENFORCEMENT AND EMERGENCY SERVICES

STATE POLICE	New Mexico	575-392-5588
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LOCAL AGENCIES FOR LEA COUNTY

Lovington – Sheriff	575-396-3611
Lovington – Police	575-396-2811
Lovington – Fire Dept	575-396-2359
Lovington – Ambulance	575-396-2811
Tatum – Police Dept	575-398-4444
Tatum – Fire Dept	575-398-5555

STATE AGENCIES

Oil Conservation Division, Santa Fe	505-476-3440
Oil Conservation Division – District Office, Hobbs	575-393-6161
Environmental Department – Air Quality Bureau, Santa Fe	505-827-1494

FEDERAL AGENCY

U. S. EPA – Region VI Office, Dallas, TX	800-887-6063
National Response Center	800-424-8802

CONTRACTOR SUPPORT

ELECTRIC SERVICE COMPANIES

Lea county Electric Coop., Inc.	575-396-3631
Kay and Company	806-592-3513
Tessco	432-682-1991

WATER SERVICE AND VACUUM TRUCKS

Gandy Corporation – Lovington, NM	575-396-4948 24 hour
State Line Trucking – Lubbock, TX	806-771-3818

ROUSTABOUT CREWS

Flint Energy Services – Odessa, TX	432-332-0687 24 hour
Gandy Corporation – Lovington, NM	575-396-4948 24 hour
Watson Construction – Hobbs, NM	575-391-0537 24 hour

DIRT WORK EQUIPMENT

Watson Construction – Hobbs, NM	575-391-0537 24 hour
Ferguson Construction – Lovington, NM	575-396-3689 24 hour
Gandy Corporation – Lovington, NM	575-396-4948 24 hour

WELDERS

Watson Construction – Hobbs, NM	575-391-0537 24 hour
Flint Energy Services – Odessa, TX	432-332-0687 24 hour
Ferguson Construction – Lovington, NM	575-396-3689 24 hour

SAFETY EQUIPMENT

Total Safety Equip. – Hobbs, NM	575-392-2973 24 hour
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Chavez, Carl J, EMNRD

From: Wrangham, Calvin W. [CalvinWrangham@targaresources.com]
Sent: Thursday, March 31, 2011 12:32 PM
To: Chavez, Carl J, EMNRD; Hudson, Matt
Cc: VonGonten, Glenn, EMNRD; Lowe, Leonard, EMNRD; Griswold, Jim, EMNRD
Subject: RE: GW-003 and GW-004 H2S CPs

Carl,
Targa is the operator of the Targa Eunice Plant (GW-005), Eunice North Compressor Station (GW-345), and South Eunice Compressor Station (GW-344). As you stated below these facilities are covered in an already submitted H2S CP.

The original GW Discharge plans for North CS (GW-004) and South CS (GW-003) were retained by Chevron to cover the environmental projects occurring at those two sites. New DP numbers were issued to Targa for the current operations, North CS (GW-345 and for South CS GW-344).

As stated above the current operations at these facilities concerning H2S CP are covered by Targa's Plan referring to GW-005, GW-344 and 345.

Targa is in the process of adding a acid gas injection well at the Monument Plant (GW-025) and are in the process of renewing the H2S CP for that facility to cover the existing and new processes. The Buckeye Compressor Station (GW-029) is part of the Monument Plant gathering system so that facility will be included in the Monument H2S CP.

Targa also operates The Saunders Plant (GW-026) and are in the process of renewing the H2S CP for that facility. The Vada Compressor Station (GW-027) is part of the Saunders Plant gathering system so that facility will be included in the Saunders H2S CP.

Hope this helps clarify the plans and facilities covered.

Thanks, Cal.

From: Chavez, Carl J, EMNRD [<mailto:CarlJ.Chavez@state.nm.us>]
Sent: Thursday, March 31, 2011 12:08 PM
To: Hudson, Matt
Cc: Wrangham, Calvin W.; VonGonten, Glenn, EMNRD; Lowe, Leonard, EMNRD; Griswold, Jim, EMNRD
Subject: GW-003 and GW-004 H2S CPs

Matt:

Good morning. Subsequent to our meeting with Chevron USA, Inc. (Chevron) this morning regarding the above subject facilities, please find attached the letters that were mailed to you, but as you indicated, Chevron deals with just the environmental aspects of the facilities and Targa is the operator who would be responsible for any H2S CP. In addition, as we discussed, Targa has already submitted an H2S CP for the GW-005 Middle GP, which will cover all of the above subject facilities including possibly GWs-29 344 of Targa.

Please respond to this e-mail with any clarifications of Chevron's involvement with the H2S CP aspects at the facilities mentioned above. Please contact me if you have questions. Thank you.

Xc: OCD Online "GWs 3, 4, 29 and 344" at "H2S Contingency Plan" Thumbnail

Carl J. Chavez, CHMM

New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3490
Fax: (505) 476-3462
E-mail: CarlJ.Chavez@state.nm.us

Website: <http://www.emnrd.state.nm.us/ocd/index.htm>

"Why not Prevent Pollution; Minimize Waste; Reduce the Cost of Operations; & Move Forward with the Rest of the Nation?" To see how, go to "Pollution Prevention & Waste Minimization" at: <http://www.emnrd.state.nm.us/ocd/environmental.htm#environmental>)

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New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

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

Daniel Sanchez
Acting Division Director
Oil Conservation Division



March 1, 2011

Ms. Cindy Klein
ES&H Specialist
Targa Midstream Services, L.P.
6 Desta Drive Suite 3300
Midland, TX 79705

Dear Ms. Klein:

Re: Dynege Vada Gas Plant (GW-27) Oil and Gas Facilities/Operations that may Vent and/or Flare H₂S Gas

The New Mexico Oil Conservation Division (OCD) is writing to operators of the above-referenced types of facilities or operations that may have New Mexico Environmental Department (NMED) - Air Quality Bureau (AQB) Oil and Gas type Permits. The purpose of this communication is to inform operators of such facilities regarding OCD Rules that may be applicable to gas plant operators and/or oil and gas facilities/operations in the hope that it provides some clarification regarding the applicability of these rules, and to ultimately increase overall compliance

In New Mexico, the OCD Rules that pertain to Hydrogen Sulfide (H₂S) Gas are provided at § 19.15.11 *et seq.* NMAC (Hydrogen Sulfide Gas). The OCD Oil and Gas Rules that address "No-Flare" and the OCD Form C-129 process are provided at § 19.15.7.37 *et seq.* NMAC (Application for Exception to No-Flare). Gas plants have gas gathering pipelines with meters connected to operators who then either sell or vent casinghead gas into the gas gathering pipelines that feed into the plants. The OCD Rules that pertain to "Casinghead Gas" are provided at § 19.15.18.12 *et seq.* NMAC (Production Operating Practices).

This letter was precipitated by a recent event where a gas plant operator shut-in a "gas gathering pipeline." This "shutting-in" of the pipeline impacted approximately thirty individually-metered operators who may have continued operating instead of "shutting-in" their well(s). In spite of the fact that approximately thirty operators were impacted, the OCD observed that only one of those thirty operators contacted the OCD via Form C-129 as required under the OCD Rules to obtain approval of their application for an "exception to no-flare." (The operator initially had contacted the OCD to request approval to vent H₂S gas into the air rather than shut-in the well.) The OCD has serious public safety concerns when operators do not properly shut-in their wells when gas gathering pipelines and/or meters are shut-in, especially where the wells are near populated and/or agricultural areas due to the potential for loss of life from toxic gas.

In subsequent communications with gas plant operators who flare gas, the OCD discovered that the operators were under the impression that if their facility has an NMED- AQB Construction Permit which includes a provision to flare/emit gas, then this is all that is needed to operate in New Mexico. This is actually only partially

Oil Conservation Division
1220 South St. Francis Drive • Santa Fe, New Mexico 87505
Phone (505) 476-3440 • Fax (505) 476-3462 • www.emnrd.state.nm.us/OCD



Ms. Klein
Targa Midstream Services, L.P.
March 1, 2011
Page 2 of 2

correct because operators are also required to comply with the requirements set out in the OCD Rules regarding flaring and venting. For example, in the situation where a gas plant operator has notified connected well operators of a gas-gathering pipeline shut-down, each of those well operators is required to shut-in its well(s) or to obtain OCD District Supervisor approval to flare via an OCD C-129 Form. Operators who do not comply are illegally venting and/or flaring gas under OCD Rules.

In addition, gas plants and/or oil and gas operators may be required to satisfy OCD § 19.15.11 et seq. NMAC (Hydrogen Sulfide Gas) Contingency Plan requirements for facilities and wells in cases where 100 ppm or greater H₂S concentrations may impact public areas. OCD records indicate that Targa Midstream Services, L.P. does not currently have an H₂S Contingency Plan (CP) on file with the OCD. If you do not have an approved CP under § 19.15.11 et seq. NMAC (Hydrogen Sulfide Gas) for your gas plant yet, please submit your CP to the OCD Environmental Bureau in Santa Fe on or before August 11, 2011. *(The OCD notes that it is aware of some operators who have recently submitted CPs to the OCD that are currently under review. Please advise if this is the case for Targa Midstream Services, L.P.).*

The OCD recognizes that when multiple sets of Rules, Regulations and Statutes apply, it can sometimes be tricky to definitively determine which requirements apply, to whom and in what circumstances. Operators must, however, take all care to ensure that they are at all times operating in compliance with all applicable state, federal and/or local rules and regulations. In this instance, this means that operators are subject not only to the requirements imposed by the NMED-AQB permitting structure, but also to those set forth in the OCD Rules.

We hope that this communication has helped to clarify the issue regarding the applicability of the OCD Rules in these situations, regardless of the existence of a valid NMED-AQB permit. Please contact Carl Chavez of my staff at (505) 476-3490 if you have questions or need assistance with the CP. The OCD looks forward to bringing your facility into compliance with OCD Rules if it is not currently already in compliance. Thank you for your cooperation in this matter.

Sincerely,



Daniel Sanchez,
Compliance & Enforcement Manager

xc: Richard Goodyear, NMED- AQB
OCD Environmental Bureau
OCD District Offices