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Alberto A. Gutiérrez, C.P.G.

May 11, 2021

VIA ELECTRONIC MAIL AND
FEDERAL EXPRESS

Carl Chavez
Environmental Bureau
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

RE: HYDROGEN SULFIDE CONTINGENCY PLAN FOR THE PIÑON MIDSTREAM - DARK HORSE GAS TREATMENT FACILITY

Mr. Chavez,

On behalf of Piñon Midstream, LLC (Piñon), Geolex, Inc.® (Geolex) has developed and is hereby submitting for review a complete Rule 11 - Hydrogen Sulfide (H_2S) Contingency Plan (the Plan) that will direct the H_2S-related emergency response actions at the Piñon Dark Horse Gas Treatment Facility. The Plan follows the structure and requirements outlined in the NMOCD-provided Review Checklist, which has been updated with plan-specific details and can be found following the title page of the H_2S plan.

The Dark Horse Treatment Facility is being constructed approximately six (6) miles west of Jal, New Mexico in Section 20 of Township 25 South and Range 36 East and will dispose of carbon dioxide (CO_2) and H_2S waste gasses through an associated acid gas injection (AGI) well, the Independence AGI Well No. 1 (API: 30-025-48081), which is also currently being constructed. Pursuant to the requirements of the approved AGI well injection permit (NMOCC Order No. R-21455-A), the Plan has been developed in collaboration with various state and local agencies. These include the local city officials of Jal, New Mexico, Lea County Emergency Management, the New Mexico Department of Homeland Security and Emergency Management, and relevant local emergency response agencies (e.g., police, fire, EMS). Additionally, significant effort has been made to coordinate with local businesses and residents to assure the development an effective response procedure that is protective of the public and the environment.

In addition to this electronic submission, a hard-copy version will be provided that includes a USB storage drive containing specific gas-gathering geospatial data specifically required by permit to be submitted with this plan. If you have any questions concerning this submittal, or wish to discuss further, please do not hesitate to contact Alberto A. Gutiérrez, C.P.G., or David White at (505)842-8000 at Geolex, Inc.®; 500 Marquette Avenue NW, Suite 1350; Albuquerque, New Mexico 87102.

Sincerely,
Geolex, Inc.®

Alberto A. Gutiérrez, C.P.G.
President
Consultant to Piñon Midstream

Enclosure: Dark Horse Treatment Facility - Hydrogen Sulfide Contingency Plan

P:\20-025 Ameredev Drill-Completion\Drilling AGI #1\H2S Contingency Plan\Contingency Plan Cover Letter.docx needs to be Scanned To Carl -

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H_2S CONTINGENCY PLAN

PIÑON MIDSTREAM – DARK HORSE GAS TREATMENT PLANT
LEA COUNTY, NEW MEXICO

Piñon Midstream
465 W. NM Highway 128
Jal, New Mexico 88252

May 2021

Prepared by:

GEOLEX
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The following check list is provided by NMOCD to ensure completeness and accuracy of the components of the H_2S Contingency Plan. Requirements, applicable regulations, and location within this document are provided for reference.

Contingency Plan Requirements Checklist	Applicable Regulation(s)		
19.15.11.9.B NMAC Requirement		**Included?**	**Page in Document?**
Emergency Procedures			
Responsibilities & duties of personnel during emergency	19.15.11.9.B.2.a & 19.15.11.9.B.2.d	Y	Pages 4 - 5
Immediate action plan	19.15.11.9.B.2.a; 19.15.11.9.B.2.d; & 12.15.11.12.D.2 (well control)	Y	Page 5; Appendix A
Evacuation & shelter in place plans	19.15.11.9.B.2.a; & 19.15.11.9.B.2.d	Y	Pages 1 & 6; Appendices A & B
Telephone numbers of emergency responders	19.15.11.9.B.2.a & 19.15.11.9.H	Y	Appendix C
Telephone numbers of public agencies	19.15.11.9.B.2.a & 19.15.11.9.H	Y	Appendix C
Telephone numbers of local government	19.15.11.9.B.2.a & 19.15.11.9.H	Y	Appendix C
Telephone numbers of appropriate public authorities	19.15.11.9.B.2.a	Y	Appendix C
Location of potentially affected public areas	19.15.11.7.H; 19.15.11.8.C.2; 19.15.11.8.D; 19.15.11.9.A; 19.15.11.9.B.2.a; 19.15.11.9.D.2; 19.15.11.11.D; 19.15.11.12.B.2.a; & 19.15.11.12.D	Y	Pages 6-7: Figure 4
Location of potentially affected public roads	19.15.11.7.H.2; 19.15.11.7.J; 19.15.11.9.B.2.a; 19.15.11.9.B.2.c; & 19.15.11.9.C	Y	Pages 6-7: Figure 4
Proposed evacuation routes, with locations of road blocks	19.15.11.9.B.2.a & 19.15.11.9.B.2.d	Y	Figures 3 & 4
Procedures for notifying the public	19.15.11.9.B.2.a	Y	Pages 5-7, Appendices A & B
Availability & location of safety equipment & supplies	19.15.11.9.B.2.a; 19.15.11.11.C; & 19.15.11.12.D	Y	Pages 8-10: Figure 3
Characteristics of hydrogen sulfide & sulfur dioxide			
Discussion of characteristics	19.15.11.9.B.2.b	Y	Page 11
Maps & Drawings			
Area of exposure	19.15.11.7.B & 19.15.11.9.B.2.c;	Y	Page 14, Appendix D, Figure 4
Public areas within area of exposure	19.15.11.7.B; 19.15.11.7.H; 19.15.11.7.I; 19.15.11.7.K.1-3; 19.15.11.8.C.1-2; 19.15.11.8.D; 19.15.11.9.B.2.c; 19.15.11.9.C; 19.15.11.9.D.2; 19.15.11.11.D; 19.15.11.11.E; 19.15.11.12.D; & 19.15.11.12.D.	Y	Pages 6 - 7, Figure 4
Public roads within area of exposure	19.15.11.9.B.2.a; 19.15.11.9.B.2.c & 19.15.11.9.C	Y	Pages 6 - 7, Figure 4
Training & Drills			
Training of personnel to include responsibilities, duties, hazards, detection, personal protection & contingency procedure	19.15.11.9.B.2.a; 19.15.11.9.B.2.d; 19.15.11.12 & 19.15.11.13	Y	Pages 17 - 19
Periodic drills or exercises that simulate a release	19.15.11.9.B.2.d	Y	Pages 17 - 18
Documentation of training, drills, & attendance	19.15.11.9.B.2.d	Y	Page 19
Training of residents on protective measures	19.15.11.9.B.2.d	Y	Page 17

Briefing of public officials on evacuation or shelter-in-place plans	19.15.11.9.B.2.a & d	Y	Page 18
Coordination with state emergency plans			
How emergency response actions will coordinate with OCD & the state police response plans	19.15.11.9.B.2.e	Y	Page 20
Activation Levels			
Activation Levels & description of events which may lead to a release in excess of activation level	19.15.11.9.B.2.f 19.15.11.9.C; & 19.05.11.16	Y	Page 21, Appendices A & B
Plan Activation			
Commitment to activate contingency plan whenever H2S concentration of more that 100 ppm in a public area or 500 ppm at a public road	19.15.11.7.H & 19.15.11.7.I; 19.15.11.9.B.2.a 19.15.11.9.B.2.c & 19.15.11.9.C	Y	Page 21, Appendices A & B
Commitment to activate contingency plan whenever H2S concentration of more that 100 ppm 3000 feet from the site of release	19.15.11.7.H & 19.15.11.9.C	Y	Page 21, Appendices A & B
Acid Gas Injection Well Information			
Well name, API#, legal description, map location, figures &/or construction diagrams	API RP-49 Recommended Practice for Drilling & Well Servicing Operations Involving Hydrogen Sulfide; & API RP-54 Recommended Practice for Occupational Safety for Oil & Gas Drilling & Servicing Operations	Y	Pages vi, 1, Figures 1, 5, & 6
Compliance w/ OCD "Well" Regulations:	19.15.11.7K(3) NMAC; 19.15.11.9B(2)&H NMAC; 19.15.11.10 NMAC; 19.15.11.11 NMAC. 19.15.11.12 NMAC & 19.15.11.16 NMAC	Y	Pages 1, 4, 8, 11, 12, 15 - 20, Figures 3 & 4, Appendices A & G
Compliance w/ applicable standards	API RP-49; API RP-54 (formerly RP-68); API RP-55; & NACE Standards for Sour Gas Wells	Y	Page 1
Adequate H2S Detection Monitoring	19.15.11.11.B NMAC	Y	Figure 2
Notification CP implementation w/ C-141 Full Report submitted to the OCD within 15-days of release	19.15.11.16 NMAC	Y	Page 20, Appendix G
Miscellaneous			
AGI Well Location	19.15.11.7K(3) NMAC; 19.15.11.9B(2)&H NMAC; 19.15.11.10 NMAC; 19.15.11.11 NMAC. 19.15.11.12 NMAC & 19.15.11.16 NMAC	Y	Page vi, Figures 1 & 4
Pipeline(s)	19.15.11.12 NMAC; 19.15.11.12.B NMAC; & 19.15.11.12.C NMAC	Y	Figure 10
Flare Stack	19.15.11.11.D NMAC;	Y	Figures 2 & 3
Signs	19.15.11.10 NMAC	Y	Page 9, Figure 9
Emergency Shut Down- ESD	19.15.11.12.D.1 NMAC	Y	Page 8, Figure 2
Hazards	19.15.11.13 NMAC	Y	Page 17
AGI Wells	19.15.11.7.D.2-4 NMAC; 19.15.11.7K(3) NMAC; 19.15.11.9B(2)&H NMAC; 19.15.11.10 NMAC; 19.15.11.11 NMAC. 19.15.11.12 NMAC & 19.15.11.16 NMAC	Y	Pages 1, 4, 8, 11, 12, 14 - 20, Figures 3 & 4, Appendices A & G
Maps & Drawings	19.15.11.9.B.2.c NMAC	Y	Page 16

TABLE OF CONTENTS

LIST OF FIGURES:

LIST OF TABLES:

APPENDICES:

LOCATION OF PIÑON MIDSTREAM DARK HORSE GAS TREATMENT PLANT:

Ameredev II, LLC is constructing an approved acid gas injection (AGI) well to be operated by Piñon Midstream as part of the Dark Horse Gas Treatment Plant in southeastern New Mexico. The Plant and AGI well are to be constructed in Section 20, Township 25 South, Range 36 East in Lea County, New Mexico on land owned by Ameredev Operating, LLC.

DARK HORSE GAS TREATMENT PLANT MAILING ADDRESS:

Piñon Midstream, LLC
Dark Horse Gas Treatment Plant
465 W. NM Highway 128
Jal, NM 88252

DRIVING DIRECTIONS FROM JAL, NM TO THE PIÑON FACILITY:

From Jal, NM (intersection of 3rd Street and Highway NM-128), drive west on Highway NM-128 and continue for approximately 5.4 miles. Turn left (south) on lease road and continue for 1.1 miles. Turn right (west) on lease road at primary entrance to Piñon Dark Horse Gas Treating Facility. Signage indicating direction to Piñon Midstream plant will be posted at intersection of lease road and Highway NM-128 and at primary facility entrance.

ACID GAS INJECTION WELL LOCATION:

The Independence AGI #1 well is located near the northwest corner of the plant facility (Figure 1).

AGI Well Surface Location:	829' FNL & 1,443' FWL
	Section 20, Township 25S, Range 36E
	Latitude (NAD83): 32.120855
	Longitude (NAD83): -103.291021

PIÑON MIDSTREAM CORPORATE ADDRESS:

Piñon Midstream
20445 State Hwy 249, Suite 300
Houston, Texas 77070

GLOSSARY OF ACRONYMS UTILIZED IN THE H_2S CONTINGENCY PLAN

ACGIH	American Conference of Governmental Industrial Hygienists
AGI	Acid Gas Injection
ANSI	American National Standards Institute
API	American Petroleum Institute
CO_2	Carbon Dioxide
DCS	Distributed Control System
DOT	Department of Transportation
ERO	Emergency Response Officer
ESD	Emergency Shutdown
H_2S	Hydrogen Sulfide
IC	Incident Commander
ICS	Incident Command System
ICC	Incident Command Center
IDLH	Immediately Dangerous to Life or Health
LEL	Lower Explosive Limit
LEPC	Local Emergency Planning Committee
MSDS	Materials Safety Data Sheets
NACE	National Association of Corrosion Engineers
NCP	National Contingency Plan
NIIMS	National Interagency Incident Management System
NIOSH	National Institute of Occupational Safety and Health
NGL	Natural Gas Liquid
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
NMOCC	New Mexico Oil Conservation Commission
OCD	Oil Conservation Division
OSHA	Occupational Safety and Health Administration
PLC	Programmable Logic Controller
PPE	Personal Protective Equipment
PPM	Parts Per Million
ROE	Radius of Exposure
SCBA	Self-Contained Breathing Apparatus
SERC	State Emergency Response Commission
SO_2	Sulfur Dioxide
STEL	Short Term Exposure Limit
TLV	Threshold Limit Value
TWA	Time Weighted Average

1.0 INTRODUCTION [NMAC 19.15.11 ET SEQ.] [API RP-55 7.1, RP-49, & RP-68]

Piñon Midstream, LLC (Piñon) is currently constructing the new Dark Horse Gas Treatment Plant in order to treat sour gas resources that will be conveyed to the plant from gathering systems in the area of the facility. These gathering systems are shown in Figure 10 and a GIS shape file included as Appendix I. The Dark Horse Gas Treatment Plant (hereafter the "Plant") is designed and being constructed to treat field gas containing hydrogen sulfide (H_2S) and handles and/or generates sulfur dioxide (SO_2). Ameredev II, LLC (Ameredev) has received authorization to inject H_2S from the New Mexico Oil Conservation Commission (NMOCC) and is currently constructing an associated acid gas injection well (Independence AGI #1; API: 30-025-48081), which will be utilized for disposal of H_2S waste products. Procedures and materials used by Ameredev for well operations and construction are consistent with OCD regulations pertaining to "Protection from Hydrogen Sulfide during Drilling, Completion, Workover and Well Servicing Operations" (NMAC 19.15.11.11). Following drilling and completion of the well, and upon approval by NMOCC, the operation will transfer to Piñon Midstream, a joint venture entity in which Ameredev is a venture partner. Thus, this Hydrogen Sulfide Contingency Plan (the "H_2S Plan" or "the Plan") is being submitted to obtain approval under Rule 11 for the procedures that are to be followed in the event of an H_2S release that occurs at any location on the Plant, at the AGI processing area where Independence AGI #1 is located, or at the well itself.

The Plan complies with New Mexico Oil Conservation Division (NMOCD) Rule 11(§19.15.11 et. seq. NMAC). The plan and operation of the Dark Horse Gas Treatment Plant conform to standards set forth in API RP-55 "*Recommended Practice for Oil and Gas Producing and Gas Processing Plant Operations Involving Hydrogen Sulfide*", as well as API RP-49 "*Recommended Practice for Drilling and Well Servicing Operations Involving Hydrogen Sulfide*", API RP-68 "*Oil and Gas Well Servicing and Workover Operations involving Hydrogen Sulfide*", and applicable NACE standards for sour gas service and current best industry practices.

The Plant does not have and will not utilize any storage tanks in which H_2S or CO_2 are stored. Condensate and NGLs separated from the sour gas stream will be temporarily stored on site, thus, API regulations and OCD regulations (specifically 19.15.11.12E NMAC) relative to those types of storage are applicable for this plant but are not a consideration of this plan. Drilling and completion of the Independence AGI #1 well is being completed in compliance with NMAC 19.15.11.11. The terms used in this Plan are used as defined in Title 19, Chapter 15, Part 11 of the New Mexico Administrative Code (19.15.11.7-Definitions), unless otherwise defined herein.

Safety precautions in the event of a release may include placement of roadblocks, evacuation along designated routes, or instructions to shelter-in-place. When the term "shelter-in-place" is used in this Plan, it indicates that individuals should go inside homes, businesses, etc., turn off heating and air-conditioning systems, close windows and doors, put towels or tape around doors and/or windows that are not sealed, and wait for further instruction from the incident commander.

2.0 SCOPE [API RP-55 7.2]

This Plan is specific to the Piñon Dark Horse Gas Treatment Plant, associated AGI facility, and the AGI well (Independence AGI #1). It contains procedures to provide for an organized response to a potential unplanned release of H_2S from the Plant or the AGI well associated with the Plant and documents procedures that would be followed to alert and protect any members of the public, residents in surrounding areas, and/or contractors working on or around the plant in the event of a potential unplanned release. This H_2S Contingency Plan has been developed in coordination with state and local authorities (see Appendix J) and has been prepared to minimize the hazard resulting from a potential unplanned H_2S release. It will be used to inform company personnel, local emergency responders and the public of actions to be taken should the Plant experience such an H_2S release. All operations shall be performed with safety to the employees and public as the primary goal and to protect the environment. The highest priority of the Dark Horse Gas Treatment Plant, during a potential unplanned H_2S release, is to protect company employees, contractors, and the public; the secondary concern is to minimize the damage and other adverse effects of the emergency. In the event of a release, any part of the Plant operation that might compromise the safety of individuals will cease until the operation can be re-evaluated and the proper engineering controls implemented to assure safety. No individual should place the protection of the Plant property above his or her own personal safety. Per NMOCD request, Piñon Midstream will notify all producers with wells that feed into the Piñon Midstream gas gathering line that they are also subject to additional oversight and H_2S regulations.

In the event of a significant uncontrolled H_2S release, not only Piñon employees are involved, but local Fire Departments, Law Enforcement, City, County, and even State of New Mexico agencies may be interested parties. In any emergency situation involving an H_2S release, delegation of duties will be made to appropriate employees and groups pursuant to this plan. These duties will be reviewed on an annual basis to ensure complete understanding and facilitate a well-coordinated response by all involved personnel to the emergency situation.

3.0 PLAN AVAILABILITY [API RP-55 7.3]

The H_2S 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 Dark Horse Gas Treatment Plant Control Room, in the Plant Supervisor's office at the plant, and in the Piñon Corporate Office in Houston, Texas. See Appendix E for the H_2S Plan Distribution List, which lists all the additional entities that will be provided a copy of the H_2S Plan.

4.0 EMERGENCY PROCEDURES [NMAC 19.15.11.9.B(2)(A)] [API RP-55 7.4 A] [29 CFR 1910.1200]

4.1 RESPONSIBILITY AND DUTIES OF PERSONNEL DURING AN EMERGENCY

It is the responsibility of all on-site personnel to follow the safety and emergency procedures outlined in this H_2S Contingency Plan, as well as any plant specific safety plans retained by Piñon. The Plant uses the Incident Command System (ICS) for emergency response (see Figure 7 for a diagram of the command structure and Figure 8 for detailed information). The ICS structure used is based on the National Interagency Incident Management System (NIIMS) and is consistent with the National Contingency Plan (NCP). All Plant employees shall be prepared to respond to an H_2S emergency at the Plant and the AGI well. All Plant employees must be H_2S certified, and that certification must be renewed on an annual basis. In the event of an accidental release that results in the activation of the H_2S Plan all personnel will be evacuated out of the affected area, and the Plant Supervisor, or designee, will be the on-scene Incident Commander (IC in this Plan). Plant Operators will immediately respond to the emergency, as detailed in Appendices A and B of this plan. The IC will contact and coordinate with Piñon's management team.

The Plant Supervisor/IC or designee shall determine the need for, and implement as necessary:

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

If an emergency occurs, the Plant Supervisor, or designee, shall be notified first, and that individual will notify the VP of Operations whom will activate the Corporate Emergency Response Plan. If any person in this chain of command is unavailable, the individual making the call will elevate the communication to the next level. The intention of this process is to allow the IC to make one phone call and then be able to focus on the incident response.

4.1.1 Site Security [NMAC 19.15.11.12.B]

In order to have an accurate listing of all personnel on-site in the event of an emergency, a daily sign-in log sheet will be utilized. The sign-in log sheet will include, at a minimum the name of the individual entering the plant, the company name, time of arrival, and time of departure. All personnel are required to sign in at the Plant Office/Control Room. In compliance with 19.15.11.12.B NMAC, the Plant and AGI well are contained within a secure fenced area with locking gates.

4.1.2 Discovery and Internal Reporting

All personnel, including contractors who perform operations, maintenance and/or repair work in sour gas areas within the Plant must wear personal H_2S monitoring devices to assist them in detecting the presence of unsafe levels of H_2S. There are also fixed H_2S monitors located throughout the plant. Personal monitoring devices will give an audible alarm at 10 ppm as will the fixed H_2S monitors. When any person discovers a leak or emission release, they are to attempt to resolve the issue as long as H_2S levels remain at 10 ppm or below. If the response action needed to resolve the issue is more than simply closing a valve or stopping a small leak, the individual who has discovered the leak shall notify the Control Room Operator who will contact the Plant Supervisor or his designee so that the Plant Supervisor can activate the H_2S Contingency Plan, if necessary. The Control Room Operator will also initiate and maintain a Chronologic Record of Events Log (see Appendix F) which records the time, date, and summary of events.

The record will include, at a minimum, the following information:

- Name, telephone number, and location of person reporting the situation
- Type and severity of the emergency
- Location of the emergency and the distance to surrounding equipment and/or structures
- 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
- Description of injuries (if any) and report of damage to property and structures

If any person detects H_2S levels of 10 ppm or greater, either as a result of an alarm from their personal monitoring device or one of the plant fixed monitors, they will immediately report this to the Control Room Operator who will contact the Plant Supervisor for assistance. If the alarm persists, the responding Operator will put on the 30-minute Self Contained Breathing Apparatus (SCBA). All non-essential persons shall be notified of the release and evacuated from the area. The responding Operator, wearing the SCBA, will first help any persons requiring assistance during the evacuation, then attempt to resolve the issue. The Control Room Operator is responsible for notifying the Plant Manager or his designee so that the H_2S Contingency Plan can be activated, if necessary.

Once the Plant Manager/IC is contacted, he or his designee is to contact the appropriate Piñon management and Plant emergency response personnel (Figure 8 and Appendix C) and notify them of the existing situation. Local emergency response providers will also be contacted as deemed necessary by the IC. If necessary, the Control Room Operator will then conduct the notifications of federal and state regulatory agencies including the BLM Field Office in Carlsbad, the NMOCD District Office in Hobbs, and emergency response agencies listed in Appendix C. Dark Horse Treating Facility operations personnel will instruct any contractor and all others attempting to enter the Plant that the H_2S Plan has been activated and that they must follow direction of the IC.

4.2 IMMEDIATE ACTION PLAN

Immediate Action Plans outlining procedures and decision processes to be used in the event of an H_2S release are contained in Appendix A. These procedures and decision processes have been designed 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. Emergency response actions may be taken for a variety of situations that may occur. The Plan is activated in progressive levels (Levels 1, 2 and 3), based on the concentration and duration of the H_2S release. Response Flow Diagrams illustrating these Immediate Action Plans are contained in Appendix B. **Dark Horse Gas Treatment Plant Operators are authorized to elevate the level of response, based on observed conditions, if they feel a lower-level response may not be effective in protecting personnel, the public, or the environment.** Additional or long-term response actions will be determined on a case-by-case basis, if needed, once the Incident Command Center (ICC) and System (ICS) are established following the immediate response.

4.3 TELEPHONE NUMBERS, COMMUNICATION METHODS AND MEDIA SITE

4.3.1 Telephone Numbers and Communication Methods

In the event of activation of the Plan at levels 2 & 3, emergency responders, public agencies, local government, and other appropriate public authorities must be contacted. Public awareness and communication are a primary function of this Plan. Piñon has compiled a list of various public, private, federal, state, and local contacts that are to be notified at various phases during the activation of the Plan, and that information is included in Appendix C of this Plan. The Level 1, 2, and 3 Immediate Action Plans and the Response Flow diagrams contained in Appendices A and B indicate when certain entities

are to be contacted in event of activation of this Plan. Piñon will contact by telephone all potentially affected parties as well as state and local response organizations if the H_2S Plan is activated. All entities contacted will be advised of the following:

- The nature and extent of the release/emergency at the Plant and recommendations for protective actions, such as evacuation or shelter-in-place orders
- Any other event-specific information that is necessary to protect the public
- Updated 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

In the event of activation of the Plan, in addition to notifying individuals, businesses, and operators (listed in Appendix C), Dark Horse Gas Treatment Plant personnel, as designated by the IC, will make a visual inspection of the ROE area to ensure that no individuals are seen inside the ROE. If any are observed, they will be advised to evacuate immediately to a designated Emergency Evacuation Area (see Figure 3 and Figure 4).

4.3.2 Media Site

During all Level 2 and Level 3 events, a media site will be established adjacent to relevant assembly areas. If a Level 2 Response occurs, the Media Site will be located adjacent to Emergency Assembly Area 2 (see Figure 4). If a Level 3 Response occurs, the Media Site will be located adjacent to Emergency Assembly Area 3 (see Figure 4). The IC will designate a Media Site adjacent to the Emergency Assembly Area. The IC will also designate an individual to assume the duties of Media Liaison Officer. Under no circumstances will media personnel be allowed inside the warm or hot zone (road blocked area). Media personnel will only be allowed inside the road blocked area once the area has been monitored and restored to a cold zone (less than 10 ppm H_2S) and the IC has approved their entry. Media personnel shall not be allowed to enter the Dark Horse Treating Plant property without the approval of the Piñon Asset Manager or his designee, and shall be escorted by Piñon personnel at all times.

4.4 LOCATION OF NEARBY RESIDENCE, MEDICAL FACILITIES, ROADS, BUSINESSES, PUBLIC RECEPTORS, AND PRODUCERS

4.4.1 Residences and Medical Facilities

There is one residence and no medical facilities located within the 100 ppm Radius of Exposure (ROE) of the Plant. Upon activation of the Plan (see Appendix A for activation levels), the IC, or designee, shall notify all individuals within the 100 ppm ROE of the nature of the release and status of containment. Depending on the nature of the release and the prevailing wind conditions, individuals will be instructed to shelter in place or evacuate. Contact information for individuals of the residence can be found in Appendix C. (See Section 6.0 and Appendix D of this Plan for specific information about ROE calculations and map showing the 500 and 100 ppm ROE).

4.4.2 Roads

There is one public road located within the 100 ppm ROE (SR 128). In the event of activation of this Plan, Dark Horse Gas Treatment Plant personnel will be dispatched to establish roadblocks on this road to prevent entrance into the 100 ppm ROE, depending on the response level and as designated by the IC (see Figure 7). Roadblocks will be established at the designated locations regardless of wind direction in anticipation that variations in wind conditions can occur. There are emergency trailers or equivalent vehicles, equipped with flashing lights, windsocks, and roadblock signs for use in alerting the public of hazardous conditions on the road. Signs, warning of the potential presence of H_2S, will be installed where

the 100 ppm ROEs of the Plant intersect the above referenced public roads. (See Figure 4 for the location of these signs; see Figure 9 for a sample photograph of one of these signs).

4.4.3 Businesses or Other Public Receptors

In addition to what is stated above, there is an equipment yard hosting three equipment rental service businesses within the 100 ppm ROE (Blue Star Services, LLC, Thomas Oilfield Services, and H&S Rentals). The owner of Blue Star Services, LLC is the most likely person to be on-site, and is the owner of the yard. Upon activation of the plan, the IC, or a designee, will contact Blue Star Services, LLC and Thomas Oilfield Services with instructions. Blue Star Services, LLC will relay the information to anyone in the yard, including employees of H&S Rentals. Depending on the nature of the release and the prevailing wind conditions, individuals will be instructed to shelter in place or evacuate. Contact information for Blue Star Services, LLC and Thomas Oilfield Services is located in Appendix C.

4.4.4 Producers

There are six operators of active wells within the 100 ppm ROE (Tap Rock Operating, LLC, Fulfer Oil and Cattle LLC, BC&D Operating Inc., Chevron USA Inc., Caza Operating, LLC, and Ameredev Operating, LLC). Contact information for the producers is contained in Appendix C.

4.5 EVACUATION ROUTES, EMERGENCY ASSEMBLY AREAS, AND ROAD BLOCK LOCATIONS

4.5.1 Evacuation Routes and Emergency Assembly Areas

Figure 2 shows the Plant plot plan, location of the AGI Well and internal plant evacuation routes. Figures 3 and 4 shows the locations of Emergency Assembly Areas and recommended evacuation routes. Evacuation for all visitors and all personnel that are not operators begins with the 10 ppm H_2S siren and activation of amber beacons (see Appendix A). The responding Plant operator(s) are to put on the 30-minute SCBA and first determine if any personnel are in distress and assist any distressed personnel to evacuate to Emergency Assembly Area 1. Emergency services (911) will be contacted if there are injuries or as otherwise deemed necessary. Responding operators, wearing the SCBAs, will then investigate the cause of the release. At the sound of the alarm and activation of amber beacons, all other personnel in the Plant are to stop work, check the prevailing wind direction (using visible windsocks) and immediately proceed along designated evacuation routes and/or upwind to the pre-designated Emergency Assembly Areas shown in Figure 4. Prevailing winds for the area are from the south-southwest. Personnel should evacuate along the designated route unless that route is downwind of the release (based on the wind directions observed at the windsocks); in that event all evacuees should proceed along a route that is perpendicular to the release and then upwind to the designated Emergency Assembly Area.

Roll call shall be conducted at the Emergency Assembly Area to ensure all personnel (including contractors and visitors) are accounted for and have evacuated safely. The Dark Horse Gas Treatment Plant is a Process Safety Management (PSM) facility and requires all personnel to check-in and sign-in at the Plant Office or Plant Control Room before entering the Plant. The sign-in sheet will be used at the Emergency Assembly Areas to make a full accounting of all personnel and visitors. At each Emergency Assembly Area, the ambient air quality will be monitored for H_2S concentration to ensure the area remains at less than 10 ppm. If the H_2S concentration rises to 10 ppm or greater, the assembly area will be relocated as detailed in the immediate action plan section of this document (see Appendix A).

4.5.2 Road Block Locations

Pre-planned road block locations (which would be utilized in the event of a Level 3 response) are shown on the ROE Map (Figure 4). Each location will have portable road barriers, flashing lights, and warning signs. The IC will designate representatives to staff each of the roadblocks. If deemed necessary by the

IC, the State or Local Police will be asked to assist with maintaining the roadblocks and directing traffic through alternate routes outside of the ROE.

4.6 MONITORING EQUIPMENT, ALARM SYSTEMS, SAFETY EQUIPMENT, AND SUPPLIES

4.6.1 Emergency Shutdown Systems [NMAC 19.15.11.12.D(1)]

The Dark Horse Treatment Facility is equipped with an emergency shutdown (ESD) system at the Plant and AGI well. The ESD system is a fail-safe hardwired system activated by push-button stations placed throughout the Plant (Figure 2). Operators in consultation with the IC will determine if an H_2S release situation warrants ESD of the plant. When activated, the ESD System is designed to perform the following actions through the use of a hardwired interface:

- Close all hydrocarbon inlet and outlet valves to and from the Plant and AGI Well
- Initiate a distinct alarm and/or light which is separate from the general plant alarm
- Shut off fuel for all individual fuel uses
- Isolate Natural Gas Liquid (NGL) storage tanks and product pumps
- Shut down all electric motors (with exceptions such as lube oil pumps, flare blowers, instrument air compressors, etc.)
- Shut down rotating equipment (engine-driven equipment, expander/compressors, pumps, etc.)
- Isolate fuel to engine-driven equipment

The locations of the ESD buttons and Isolation Valves are shown in Figures 2. The ESD systems are designed to prevent a Level 2 and/or Level 3 response. Block valves on incoming lines can be closed where they enter the Plant perimeter (see Figure 3). Additional isolating block valves outside the Plant perimeter on the incoming lines can be closed to prevent further gas flow into the Plant. The block valves furthest upstream can isolate the entire system from the field gathering lines coming into the Plant. At the discretion of the IC, operations personnel may be designated to close valves at field locations on inlet gas pipelines to ensure that incoming gas is shut off. Figure 10 shows the map of the sour gas pipeline which will feed the Dark Horse Gas Treatment Plant with gas from a gathering system and a compressor station nearby. The pipeline will be buried and conforms to all applicable NACE and DOT requirements. To mitigate against a possible Level 2 and/or Level 3 plan response, operators will take proactive measures to ESD the plant when 40 ppm is detected at any sensor. Furthermore, AGI compressors will be automatically shut down if two or more of the H_2S sensors located in the AGI Well area go into high alarm (90 ppm). When AGI compressors are shut-down, isolation valves upstream and downstream of the units will close as well as those located on the AGI wellhead.

The Plant ESD can be activated at any time by the Dark Horse Gas Treatment Plant Operators and is to be activated if efforts to control the release have failed or if a catastrophic release has occurred.

4.7 ALARMS, VISIBLE BEACONS, AND WIND INDICATORS

Colored beacons, horns, wind direction indicators, and ESD stations are situated in various locations throughout the Plant and are shown on Figure 2. The audible signal for an emergency response is a continuous warble alarm that sounds at 10 ppm H_2S. Amber beacons are also activated at 10 ppm H_2S. The alarm will convert to a siren when the concentration of the H_2S release is 90 ppm or higher, and evacuation of the Plant will be initiated. As per 19.15.11.12.C, wind direction indicators which are visible night and day are installed throughout the Plant as shown in Figure 2. At least one wind direction indicator can be seen from any location within the Plant as well as from any point on the perimeter of the Plant.

4.8 SIGNS AND MARKERS

The Plant and AGI well (contained totally within the Plant boundaries) have readily readable warning, caution and notice signs which conform to the current ANSI standard Z535.1-2002 (Safety Color Code). These signs contain language warnings about the presence of H_2S /Poisonous Gas and high-pressure gas; they are posted at the Plant entrance and around the perimeter of the Plant and where isolation/block valves are located (see Figure 3). The signs are of sufficient size to be readable at a distance of 50 feet and contain the words "Caution Poison Gas". Emergency response phone numbers are also posted at the entrance to the Plant, and there are signs at the Plant entrance requiring that all visitors sign-in at the Plant office. Piñon does not have the authority to require individual operators who send gas to the Plant for processing to conform to OCD and/or Department of Transportation (DOT) regulations relative to placement of warning signs at individual wells or on gathering lines. It is the responsibility of these individual operators to conform to appropriate regulations and to certify compliance with those regulations to those regulating agencies, as required. Signs, warning of the potential presence of H_2S, will be installed where the 100 ppm ROE of the Plant intersect the above referenced public roads. (See Figure 4 for the location of these signs; and see Figure 9 for a sample photograph of one of these signs).

4.9 EMERGENCY EQUIPMENT

4.9.1 Emergency Trailers

Emergency trailers or equivalent emergency vehicles, equipped with flashing lights and windsocks will be utilized at public road locations to establish roadblocks (as shown in Figure 4) to alert the public in the event of hazardous conditions. While local authorities will be notified of any plan activation requiring roadblocks, it is the responsibility of the Dark Horse Gas Treatment Plant response team to maintain and deploy the Emergency Trailers.

4.9.2 First Aid Equipment

The first aid stations are located in the control room (see Figure 3) and at other strategic locations throughout the plant.

4.10 GAS DETECTION EQUIPMENT

4.10.1 Fixed Monitors

The Dark Horse Processing Plant has numerous ambient hydrogen sulfide detectors placed strategically throughout the Plant to detect possible leaks. Upon local detection of hydrogen sulfide at 10 ppm at any detector, visible beacons are activated and an alarm is sounded. Upon detection of hydrogen sulfide at 90 ppm at any detector, an evacuation alarm is sounded throughout the Plant at which time all personnel will proceed immediately to a designated evacuation area. The Plant utilizes fixed-point monitors to detect the presence of H_2S in ambient air. The sensors are connected to the Control Room alarm panel's Programmable Logic Controllers (PLCs), and then to the Distributed Control System (DCS). The monitors are equipped with amber beacons. The beacon is activated at 10 ppm. The plant and AGI Well horns are activated with a continuous warbling alarm at 10 ppm and a plant-wide siren at 90 ppm. All monitoring equipment is Rosemount brand. The Control Panel is a 24 Channel Monitor Box, and the fixed point H_2S Sensor Heads are model number ST320A-100-ASSY.

The Plant will monitor the inlet gas steam and sweet gas stream concentrations of H_2S via H_2S Analyzers with sample points located on the north/south-oriented pipe rack (Figure 2). The acid gas stream H_2S concentrations will be sampled near the AGI pumps located on the west side of the facility. All H_2S analyzers are model T224, manufactured by Analytical Systems KECO.

The AGI system monitors can also be viewed on the PLC displays located at the Plant and the locations of ambient H_2S sensors are shown on the plot plan (see Figure 2). Immediate action is required for any alarm occurrence or malfunction. All H_2S sensors are calibrated monthly.

4.10.2 Personal and Handheld H_2S Monitors

All personnel working at the Plant wear personal H_2S monitors, which are required and to alarm and vibrate at 10 ppm. Handheld gas detection monitors are available at strategic locations around the Plant so that plant personnel can check specific areas and equipment prior to initiating maintenance or other work. The handheld gas detectors have sensors for oxygen, LEL (explosive hydrocarbon atmospheres), H_2S, and carbon dioxide (CO_2).

4.11 RESPIRATORS

The plant is equipped with six 30-minute SCBA respirators and cascade hose reel systems strategically located throughout the Plant (see Figure 2). The cascade hose reel systems have two to four compressed air cylinders hooked up in series to provide a sustained supply of breathing air for extended work time in a hazardous atmosphere. Each cylinder will supply one person six to eight hours of breathing air at normal workloads or three hours at medium/heavy workloads. Several hose reels and masks may be attached to a cascade system. The system is equipped with a low-pressure alarm to allow workers to safely exit the hazardous area with plenty of reserve air capacity. All Plant personnel are trained and fit tested annually to use the SCBA respirators.

4.12 PROCESS PURGE SYSTEM

All vessels, pumps, compression equipment, and piping in the acid gas injection process are designed and equipped to allow purging with pipeline quality gas to remove the acid gas prior to conducting maintenance or inspection work. The purge gas stream with residual acid gas is routed safely into the acid gas flares located at the plant. All flares are equipped with autoignition fuel assist devices in compliance with 19.15.11.11(D) NMAC. See Figures 2 for location of flares. Operating procedures include this purging of all equipment to avoid acid gas exposure to personnel and to prevent acid gas from escaping to the environment.

4.13 FIRE FIGHTING EQUIPMENT

Plant personnel are trained only for incipient stage fire-fighting. The fire extinguishers located in the Plant process areas, compressor buildings, process buildings, and company vehicles are typically a 30# dry chemical fire extinguisher. The Plant is also equipped with portable fire extinguishers that may be used in an emergency, and air packs, which can be utilized for escape or rescue. These facilities are located throughout the plant in key locations shown in Figure 2.

5.0 CHARACTERISTICS OF HYDROGEN SULFIDE (H_2S), SULFUR DIOXIDE (SO_2), CARBON DIOXIDE (CO_2) [NMAC 19.15.11.9.B(2)(B)] [API RP-55 7.4 B.]

5.1 HYDROGEN SULFIDE (H_2S)

The projected inlet gas streams into the Plant contain approximately 25,000 ppm (or 2.5 mole percent) of H_2S, based on data generated from the modeling of the combined inlet gas stream. H_2S is a colorless, toxic, and flammable gas, and has the odor of rotten eggs. It is heavier than air and presents a significant health hazard by paralyzing the respiratory system resulting in serious injury or death.

Table 1. Hydrogen sulfide properties and characteristics

Hydrogen Sulfide Properties and Characteristics	
CAS No.	7783-06-4
Molecular Formula	H_2S
Molecular Weight	34.082 g/mol
Ceiling Concentration	20 ppm (OSHA)
Ceiling Peak Concentration	50 ppm (OSHA)
Threshold Limit Value (TLV)	15 ppm (ACGIH)
Time Weighted Average (TWA)	10 ppm (NIOSH)
Short Term Exposure Level (STEL)	15 ppm (ACGIH)
Immediately Dangerous to Life or Health (IDLH)	100 ppm
Specific Gravity Relative to Air (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 metals, plastics, tissues, and nerves

Physical Effects of Hydrogen Sulfide		
Concentration		**Effect**
ppm	%	
1	0.00010	Can be smelled (rotten egg odor)
10	0.0010	Obvious & unpleasant odor; Permissible exposure level; safe for 8-hour exposure
15	0.0015	Short Term Exposure Limit (STEL); Safe for 15 minutes of exposure without respirator
20	0.0020	Acceptable ceiling concentration
50	0.0050	Loss of sense of smell in 15 minutes
100	0.0100	Immediately dangerous to life and 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; artificial respiration required
700	0.0700	Unconscious quickly; death will result if not rescued promptly
1000	0.1000	Instant unconsciousness; followed by death within minutes

5.2 SULFUR DIOXIDE (SO_2)

SO_2 is produced as a by-product of H_2S combustion. The waste gas stream consisting of H_2S and CO_2 is routed to the plant acid gas flare during abnormal conditions when the acid gas injection equipment is out of service. Waste gas is routed to the acid gas flare at the AGI well sites during maintenance operations when equipment needs to be blown down. It is colorless, transparent, and is non-flammable, with a pungent odor associated with burning sulfur. SO_2 is heavier than air but can be picked up by a breeze and carried downwind at elevated temperatures. It can be extremely irritating to the eyes and mucous membranes of the upper respiratory tract.

Table 2. Sulfur dioxide properties and characteristics

Sulfur Dioxide Properties and Characteristics	
CAS No.	7446-09-5
Molecular Formula	SO_2
Molecular Weight	64.07 g/mol
Permissible Exposure Limit (PEL)	5 ppm (OSHA)
Time Weighted Average (TWA)	2 ppm (ACGIH)
Short Term Exposure Level (STEL)	5 ppm (ACGIH)
Immediately Dangerous to Life or Health (IDLH)	100 ppm
Specific Gravity Relative to Air (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 Hydrogen Sulfide	
Concentration	**Effect**
1	Pungent odor, may cause respiratory changes
2	Permissible Exposure Limit (PEL); Safe for an 8-hour exposure
3-5	Pungent odor; normally a person can detect SO_2 in this range
5	Short Term Exposure Limit (STEL); Safe for 15 minutes of exposure
12	Throat irritation, coughing, chest constriction, eyes tear and burn
100	Immediately Dangerous to Life & Health (IDLH)
150	So irritating that it can only be endured for a few minutes
500	Causes a sense of suffocation, even with first breath
1000	Death may result unless rescued promptly

5.3 CARBON DIOXIDE (CO_2)

The CO_2 concentration at the Plant inlet is projected to be 40,000 ppm. CO_2 is a colorless, odorless and non-flammable gas, which is heavier than air. At concentrations above 10%, CO_2 can cause asphyxiation with prolonged exposure. Because it is relatively inert, when TAG is routed to a flare, an added combustion source is needed to ignite the volatile compounds in the presence of CO_2.

Table 3. Carbon dioxide properties and characteristics

Carbon Dioxide Properties & Characteristics	
CAS No.	124-38-9
Molecular Formula	CO_2
Molecular Weight	44.010 g/mol
Time Weighted Average (TWA)	5,000 ppm
Short Term Exposure Level (STEL)	30,000 ppm
Immediately Dangerous to Life and Health (IDLH)	40,000 ppm
Specific Gravity Relative to Air (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 Hydrogen Sulfide	
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. Judgement may be impaired, followed by loss of consciousness within minutes
10-100%	Unconsciousness occurs more rapidly above 10% level. Prolonged exposure to high concentrations may eventually result in death from asphyxiation

6.0 RADII OF EXPOSURE [NMAC 19.15.11.7.K]

WORST CASE SCENARIOS: See Appendix D for actual ROE calculations. The basis for worst case scenario calculations is as follows:

- The worst-case ROE for this Plan has been calculated utilizing the inlet and TAG flow rates (24-hour rate) and composition expected for the Plant, which is 100 MMSCFD. The ROE calculation in this Plan utilizes that inlet flow rate and an H_2S concentration for inlet gas of 2.5 mole percent. The calculated ROEs for the inlet gas are shown in the calculations in Appendix D.

- The worst-case scenario ROE assumes an uncontrolled instantaneous release of a 24-hour volume of gas at the Plant. Because the Plant is a throughput process plant, it is impossible that the entire 24-hour throughput volume of the Plant could be released instantaneously as is assumed in the worst-case scenario calculations of the ROE. Further, the Plant's ESD systems would be activated in the event of a catastrophic emergency and would prevent the flow of gas into the Plant and would isolate the AGI compressors and equipment and route the acid gas safely to the Plant acid gas flare. To comply with NMAC 19.15.11, the worst-case scenario calculations (assuming an instantaneous release of the 24-hour processing and/or TAG volume) are utilized here (see Appendix C for actual calculations).

The formulas for calculating the radius of exposure (ROE) are as follows:

100 ppm ROE Calculation (as per 19 NMAC 15.11.7.K.1):
X = [(1.589)(hydrogen sulfide concentration)(Q)](0.6258)

500 ppm ROE Calculation (as per 19 NMAC 15.11.7.K.2):
X = [(0.4546)(hydrogen sulfide concentration)(Q)](0.6258)

Where:

X = radius of exposure in feet
"hydrogen sulfide concentration" = the decimal equivalent of the 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)

ROE FOR DARK HORSE GAS TREATMENT PLANT WORST CASE SCENARIO
500-ppm ROE 15,109 feet (2.55 miles)
100-ppm ROE 6,904 feet (1.17 miles)

The ROE for the Plant and AGI well are shown on Figure 4. This ROE pattern is designed to include the 100 ppm and 500 ppm radii for a potential worst-case failure at any point in the system.

7.0 FACILITY DESCRIPTION, MAPS AND DRAWINGS [NMAC 19.15.11.9.B (2)(C)][API RP-55 7.4 C.]

7.1 DESCRIPTION OF PLANT OPERATIONS AND INDEPENDENCE AGI #1 WELL

The Plant gas-treatment and AGI facility, when in operation, will be manned 24-hours-a-day, 7-days-a week. The Plant operations include compression and treatment. The Plant gathers produced natural gas from Lea County, New Mexico and Winkler County, Texas. Once gathered at the Plant, the produced natural gas is compressed and dehydrated to remove the water content. The inlet gathering lines and pipelines that bring gas into the plant are regulated by DOT, NACE and other applicable standards which require that they be constructed and marked with appropriate warning signs along their respective rights-of-way.

Figure 2 shows the major process units and all major process equipment used to transport and treat sour gas. Because the natural gas that is gathered at the Plant contains H_2S ("sour gas"), it must be treated to remove these and other impurities. Low pressure gas from the gathering system is collected at the facility in a low-pressure LP Slug catcher at 25 psig. Using four Ariel JGC-6 3608 3 stage compressors, the sour gas is compressed to 1,050 psig and treated to remove H_2S and CO_2 with a 400 GPM amine unit. The gas is then dehydrated in a 25 GPM triethylene glycol dehydration system. The treated high-pressure gas is metered as it is transported to a takeaway pipeline. Condensates collected in the low-pressure slug catcher are routed to a condensate surge vessel. Using a two-tower stabilization unit, the natural gas liquids are separated out of the condensate. Both the condensate and the natural gas liquids are stored on-site prior to transportation away from the facility via truck or pipe. The condensate and natural gas liquids in the storage vessels will have much lower concentrations of H_2S, however, any stairs or ladders leading to the top of the vessels will be chained or marked to restrict entry pursuant 19.15.11.12E NMAC.

The CO_2 and H_2S stream that is removed from the natural gas in the amine treating process is compressed up to approximately 3,800 psig using Triplex Reciprocating Pumps. Water vapor contained in the gas stream is removed during compression and cooling and is sent to a 400 BBL process water tank for truck load out. The compressed acid gas is transported via an underground stainless stainless-steel, corrosion-resistant, NACE-compliant pipe, approximately 600 feet in length, from the compressor to the AGI well where it is injected into the Siluro-Devonian Section (approximately 16,102 to 17,900 feet below the surface). The pipe between the compressors and the AGI well is contained totally within the boundaries of the Plant and does not cross any public roads. H_2S sensors are located at critical junctions along the pipe which will be racked over short distances near connections with the compressor and the wellhead. The pressure in the pipe is monitored continuously so that the acid gas injection process could be stopped should there be any unusual variations in pressure.

The AGI well is an integral component of the Dark Horse Gas Treatment Plant design. It is constructed using the same materials as shown in Figure 5. The general schematic of the AGI system is shown in Figure 6. The surface casing extends to 1,383 feet to protect all usable ground water. Three strings of intermediate casing are set at 3,412, 7,150, and 13,233 feet respectively. Each string of the telescoping casing is cemented to the surface and includes the "downhole" subsurface safety valve (SSV) which is located approximately 250 feet below the surface on the production tubing to assure that fluid cannot flow back out of the well in the event of a failure of the injection equipment. In addition, the annular space between the production tubing and the production casing are filled with corrosion-inhibited diesel fuel (an inert fluid) as a further safety measure which is consistent with injection well designs that have been approved by NMOCD for acid gas injection.

Per National Association of Corrosion Engineers (NACE) specifications, downhole components including the SSV and packer are constructed of corrosion resistant alloy (CRA). Basal joints in the CRA casing

and joints in the tubing are also constructed of CRA material. The gates, bonnets and valve stems within the Christmas tree are CRA material as well. The rest of the Christmas tree is made of standard carbon steel components and outfitted with annular pressure gauges that remotely report operating pressure conditions in real time to a gas control center. Pursuant to NMAC 19.15.11.12.D(2), in the case of abnormal pressures or any other situation requiring immediate action, the acid gas injection process can be stopped at the compressor, and the wellhead can be shut-in using a pneumatic wing valve on the Christmas tree. The Plant operator or IC may also shut the SSV on site or remotely. In addition, the injection tubing has profile nipples which provide the ability to insert a blanking plug into the base of the well below the packer which would allow for the safe reentry into the well, if needed. These safety devices provide for downhole accessibility and reentry under pressure for permanent well control. The SSV provides a redundant safety feature to shut-in the well in case the wing valves do not close properly (see Figures 5 and 6). All of the control equipment on the well is designed and constructed in a manner such that under a worst-case scenario the well can be safely reentered under pressure to obtain permanent well control consistent with **NMAC 10.15.11.12(D)2**. Additionally, well control equipment is fully integrated into the Plant control system, such that any emergency shutdown of plant operations will trigger the activation of these components and isolate the well at the surface and approximately 250 feet below the surface.

7.2 MAPS AND FIGURES

Figure 2 shows the location of the Dark Horse Gas Treatment Plant and AGI #1. The plot plan of the Plant is the base for Figures 2 and 3 and show the locations of safety equipment and emergency evacuation routes at the plant. Figure 4 shows the 100 and 500 ppm ROE, escape routes, roadblock locations, emergency assembly areas and locations of H_2S warning signs. The design schematic of the AGI well is shown in Figure 5, and the schematic of the AGI well's tie-in to the Dark Horse Gas Treatment Plant is shown in Figure 6. Figure 7 is the Incident Command Structure, Figure 8 is the detailed Incident Command Structure, and Figure 9 is an example of an H_2S warning sign. Figure 10 shows the locations of the gas gathering lines that feed the Plant. Per request of NMOCD, Piñon will notify all operators that feed the gathering line that they may be subject to additional oversight and H_2S regulation regarding sour gas operations.

8.0 TRAINING AND DRILLS [NMAC 19.15.11.9.B(2)(D)] [API RP-55 7.4 D.]

Piñon will conduct annual training for its own personnel as well as for the public and emergency responders, as detailed below. Training will include:

- Characteristics of H_2S and safety precautions
- An overview of the Plant and AGI operations
- A review of their roles in responding to activation of the H_2S Contingency Plan
- Location of the Radii of Exposure and how to protect the public within this area
- Potential roadblock locations, potential evacuation routes, and how they can assist in implementing the Plan

8.1 TRAINING OF ESSENTIAL PERSONNEL

Annual training for Dark Horse Gas Treating Plant personnel shall include plant operators, mechanics, instrument and electrical technicians, and maintenance support personnel. Plant Operators will be responsible for initiating and implementing the H_2S Contingency Plan. In addition, all Plant personnel will receive:

- Annual training on the H_2S Contingency Plan. This training will include a review of all aspects of the Plan and will include, at a minimum, one tabletop drill involving activation of the Plan.
- 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. Included as part of this orientation is how to respond and evacuate safely in the event of a H_2S alarm or release. This training also complies with the requirements of Piñon and its Plant Process Safety Management Program and Procedures Manuals.
- All Plant personnel are also trained annually on the Dark Horse Gas Treatment Plant Emergency Response Plan.
- H_2S and SO_2 Training. All Plant personnel must be H_2S certified and must also receive annual refresher training on H_2S and SO_2, which is conducted by Dark Horse Gas Treatment Plant personnel. Individuals must maintain their H_2S certification to work at the plant. If an individual is unable to attend, they may be required to attend a third-party training session from an outside provider. All contract employees are required to have had H_2S 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 respirators. In addition to the annual training, all Plant personnel are fit tested annually on the respirators. All Plant personnel must have medical clearance for respirator use.
- Hazard Communication. All Plant personnel are trained annually on Hazard Communication. The annual training includes, at a minimum, the use of material safety data sheets (MSDS) for those materials that are present at the Plant.
- Personal Protective Equipment (PPE). All Plant personnel are trained annually on the Piñon requirements for 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.

8.2 ON-SITE OR CLASSROOM 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 Plant Supervisor.
- The annual drill will execute this Plan and include, at a minimum, the Public Officials and Local Emergency Response Agencies listed in Section 8.4 below.
- Annual training will also include contacting the entities, including any that are identified as being within the 500 ppm and 100 ppm ROE (see Appendix C), to assure contact information in Appendix C is current. Appendix C will be verified and updated annually by Dark Horse Gas Treatment Plant/Piñon to be sure any changes of occupancy, ownership or new commercial and/or residential buildings are reflected, and all owners/occupants receive training on protective measures.
- The drills will also include briefing of public officials on issues such as evacuation or shelter-in-place plans.

8.3 NOTIFICATION AND TRAINING OF PRODUCERS LOCATED WITHIN THE ROE

Piñon will provide annual training to the producers listed in Appendix C that includes:

- An overview of the Plant and AGI operations
- Design and operating safety features on the Plant
- A review of the H_2S alarms and significance
- Notification procedures
- Roadblock locations
- Potential evacuation routes
- Procedures for shelter-in-place
- Radii of exposure

8.4 TRAINING OF PUBLIC OFFICIALS AND EMERGENCY RESPONSE AGENCIES

All of the Emergency Response Agencies listed in Appendix C will have copies of the H_2S Contingency Plan and will receive training from Piñon:

- NM State Police - Hobbs Office
- Lea County 911 Emergency Response
- Lea County Emergency Planning Committee
- Lea County Sherriff's Department
- New Mexico Oil Conservation Division - Hobbs District Office
- Jal EMS – Fire, police, ambulance
- Jal City Manager

Training for emergency response agencies will include:

- An overview of the Plant and AGI operations
- Design and operating safety features on the Plant
- A review of the H_2S alarms and significance
- Notification procedures
- Roadblock locations
- Potential evacuation routes
- Procedures for shelter-in-place
- Radii of exposure

The Dark Horse Treatment Plant will also conduct, at a minimum, one annual tabletop drill involving the Emergency Response Organizations listed above on the activation of the Plant H_2S Contingency Plan.

8.5 TRAINING AND ATTENDANCE DOCUMENTATION [NMAC 19.15.11.9 G]

Pursuant to NMAC 19.15.11.9.G, drill training will be documented, and those records will be maintained at the Plant and will be available to an OCD representative upon request. The documentation shall include at a minimum the following:

- Description or scope of the drill, including date and time
- Attendees and participants in the drill
- Summary of activities and responses
- Post-drill debriefing and reviews

9.0 COORDINATION WITH STATE EMERGENCY PLANS [NMAC 19.15.11.9.B(2)(E)

9.1 NOTIFICATIONS AND REPORTS

The Plant has various notification and reporting obligations. Some are related to its state air quality permit that is overseen by NMED, as well as state and federal release 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. Reporting obligations are as follows:

9.1.1 New Mexico Oil Conservation Division (OCD) [NMAC 19.15.11.16]
As soon as possible, but no later than four hours after plan activation, (recognizing that a prompt response should supersede notification), OCD will be notified by the IC or the IC's designee via email or fax to the District I Office of the activation of the H_2S Contingency Plan. In the event of a power failure, a phone call will be made within four (4) hours. A full report of the incident to the OCD, utilizing NMOCD Form C-141 shall be made no later than 15 days following the release (see Appendix G).

9.1.2 New Mexico State Police/New Mexico Hazardous Materials Emergency Response Plan
The New Mexico State Police will be notified for a level 3 plan activation. They have authority to take control of the scene management and coordination of all resources, though limited availability of personnel may inhibit any intervention. Should the State Police assume control, a designated Emergency Response Officer (ERO) will establish the National Interagency Incident Management System (NIIMS) Incident Command System (ICS) as the Incident Commander (IC) and be responsible for management of all response resources on scene. Off-scene coordination of response resources will be handled through designated Headquarters Emergency Response Officers. Law enforcement-related activities will be coordinated by State Police.

10.0 PLAN ACTIVATION [NMAC 19.15.11.9.C] [API RP-55 7.4 D]

10.1 ACTIVATION LEVELS

Piñon Midstream commits to implement this Plan in response to the three activation thresholds that are described in detail in the Immediate Action Plan Section of this Plan (see Appendix A) and in outline form in the Response Flow Diagrams (see Appendix B).

Level 1 - Continuous localized alarm sounded and amber beacons activated for H_2S greater than 10 ppm at a personal or fixed monitor. (See Appendices A, Level 1, and Appendix B Level 1 for detail.)

Level 2 - Continuous facility-wide siren sounded and amber beacons activated for H_2S greater than 90 ppm; when corrective actions at Level 1 have been unsuccessful or when Operators activate ESD for an unexpected release not rapidly resolved (i.e., utilizing isolation valves). Notification of operators, businesses, public, BLM and state agencies initiated. (See Appendices A, Level 2 and B, Level 2 for detail.)

Level 3 - Catastrophic release; fire; explosion; a continuous release of maximum volume for 24 hours; or Rule 11 mandatory activation for 100 ppm in any defined public area; 500 ppm at any public road; or 100 ppm at a distance greater than 3000 feet from the site or the release; 10 ppm detected at Emergency Assembly Area 2. Notification of operators, businesses, public, and state agencies is initiated. (See Appendices A, Level 3 and B, Level 3 for detail.)

As soon as the Plan has been activated based on the criteria above, the Plant Supervisor, or designee, will be notified.

10.2 EVENTS THAT COULD LEAD TO A RELEASE OF H_2S

- Inlet and plant piping failure
- Amine still failure (This would be a leak in the amine process equipment, or amine still utilized to separate methane from H_2S and CO_2.)
- Flange/gasket leaks on inlet and plant piping
- Flange/gasket leak on the acid gas compressors
- Flange/gasket or valve packing leak at the AGI well or associated piping
- Valve packing failure
- Seal failure on acid gas compressors
- Failure of flare to ignite during Plant emergency blow down
- Damage to AGI wellhead

11.0 SUBMISSION OF H_2S CONTINGENCY PLANS [NMAC 19.15.11.9.D]

Piñon submitted this H_2S Contingency Plan to the OCD for review and approval on May 11, 2021.

Piñon shall maintain a copy of the contingency plan at their corporate office. The plan as approved by the OCD will be readily accessible for review by the OCD at the facility upon request.

11.1 REVISIONS TO THE PLAN

The H_2S Plan will be reviewed annually and revised at that time 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 and AGI well, specifically, those areas within the radii-of-exposure.

11.2 ANNUAL INVENTORY OF CONTINGENCY PLANS

Piñon Midstream will file an annual inventory of wells, facilities and operations for which H_2S Contingency Plans are on file with the OCD with the appropriate Local Emergency Planning Committee (LEPC) and the State Emergency Response Commission as per NMAC 19.15.11.9H. The inventory shall include the name, address, telephone number, and point of contact for all operations for which H_2S Contingency Plans are on file with the OCD.

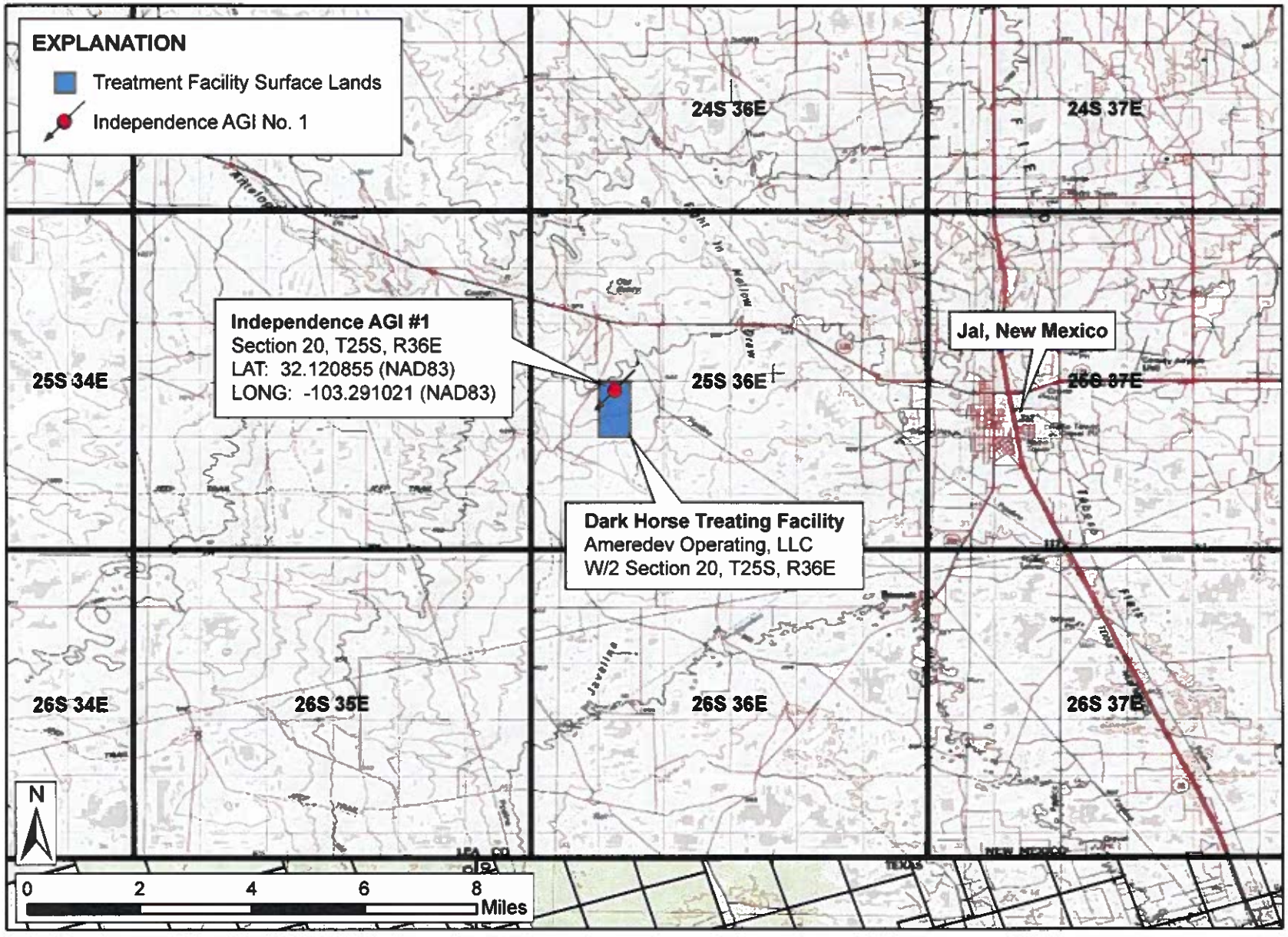


Figure 1. General location map illustrating surface lands to be occupied by the Piñon Dark Horse Treating Facility and specific location of the Independence AGI No. 1 well on the facility tract

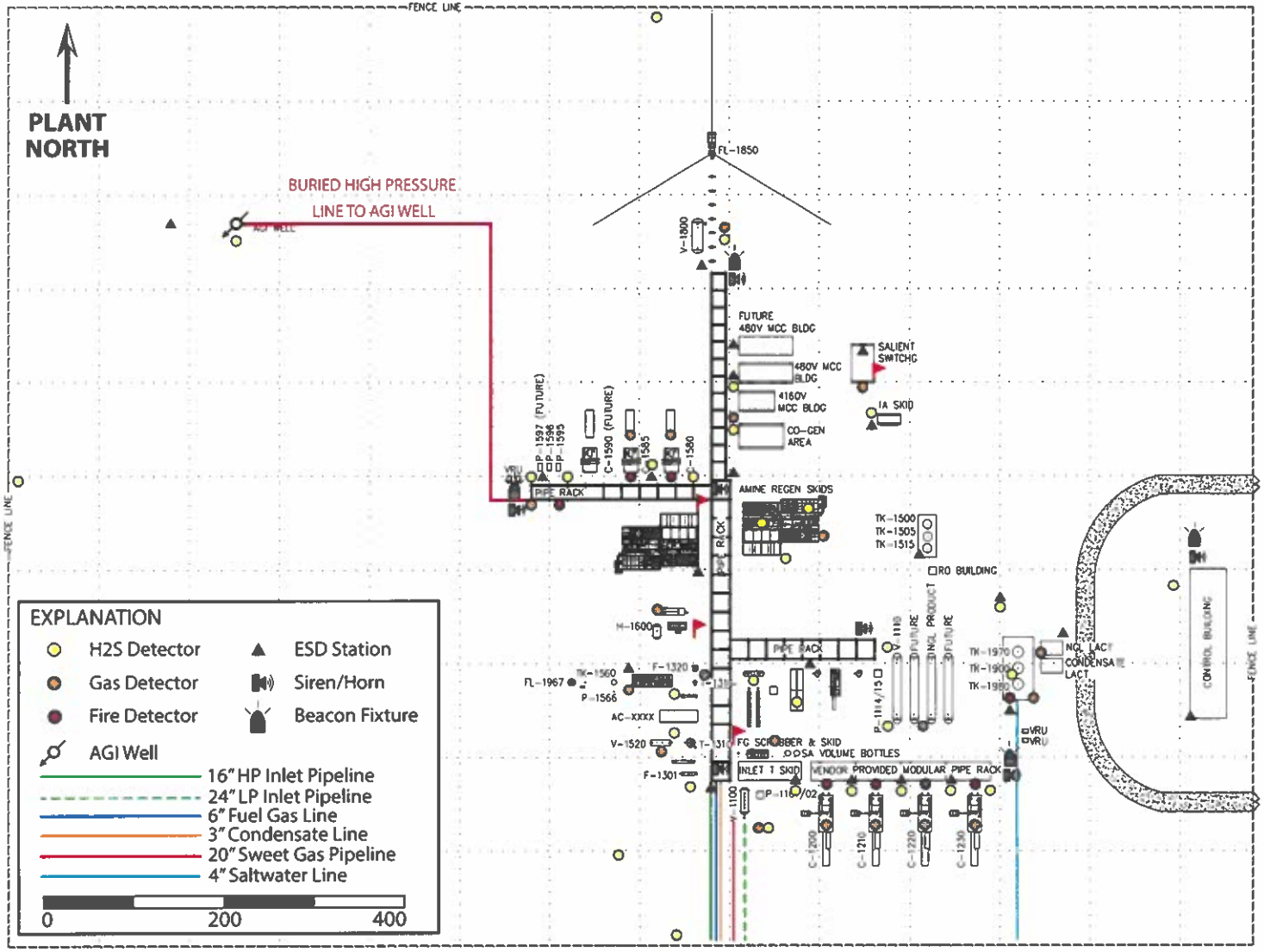


Figure 2. Detailed Dark Horse Treatment Facility plant schematic illustrating the location of major process units, all emergency equipment, H_2S and gas detection sensors, sirens and beacons, wind socks, and major gas flow lines at the facility

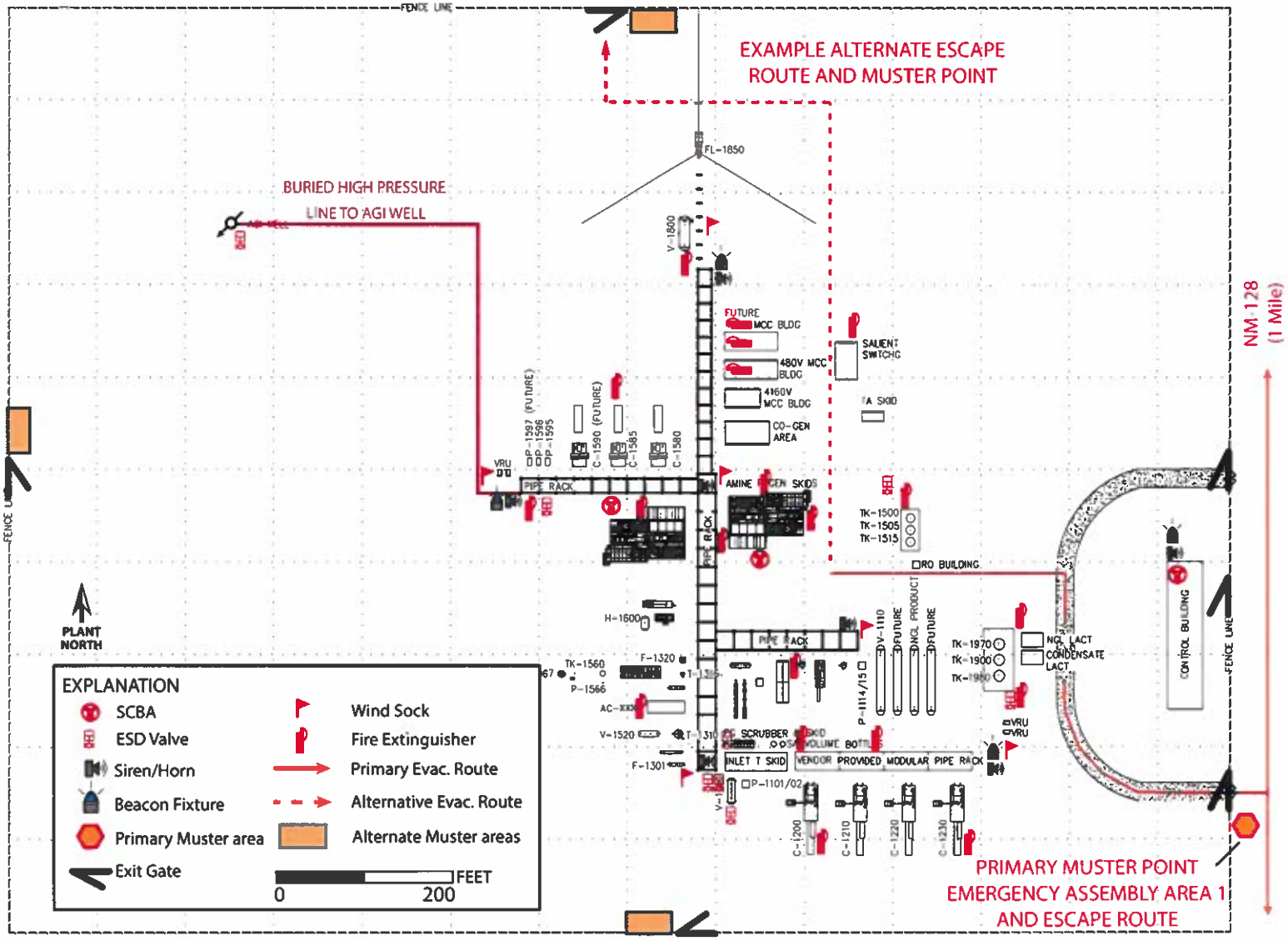


Figure 3. Detailed facility map illustrating primary and alternative evacuation routes, muster areas, exit gates, and emergency siren and beacon locations. Note: Optimal evacuation routes may vary depending on the nature of the emergency and environmental conditions at the time of the event. Predominant annual wind direction is to the southeast.

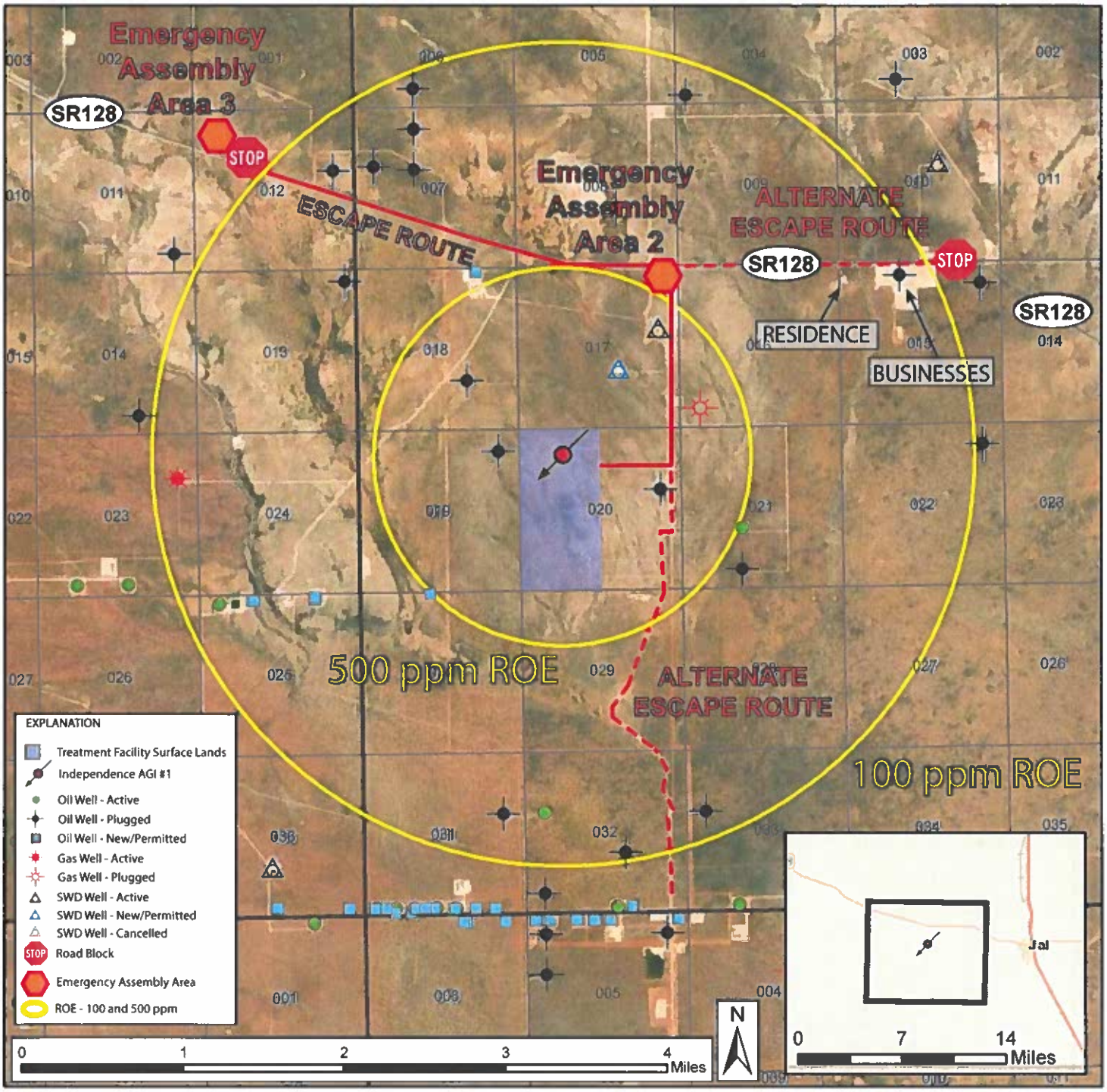


Figure 4. Radius of Exposure (ROE) map. Calculations for ROE made for concentrations of H_2S for 100ppm and 500ppm. Locations of road blocks are shown along State Road 128. Emergency assembly areas 1 and 2 are located north and west of the plant and AGI well, away from the prevailing wind direction for the area.

PIÑON MIDSTREAM

WELL SCHEMATIC
INDEPENDENCE AGI #1
S20 - T25S - R36E

GEOLEX INCORPORATED

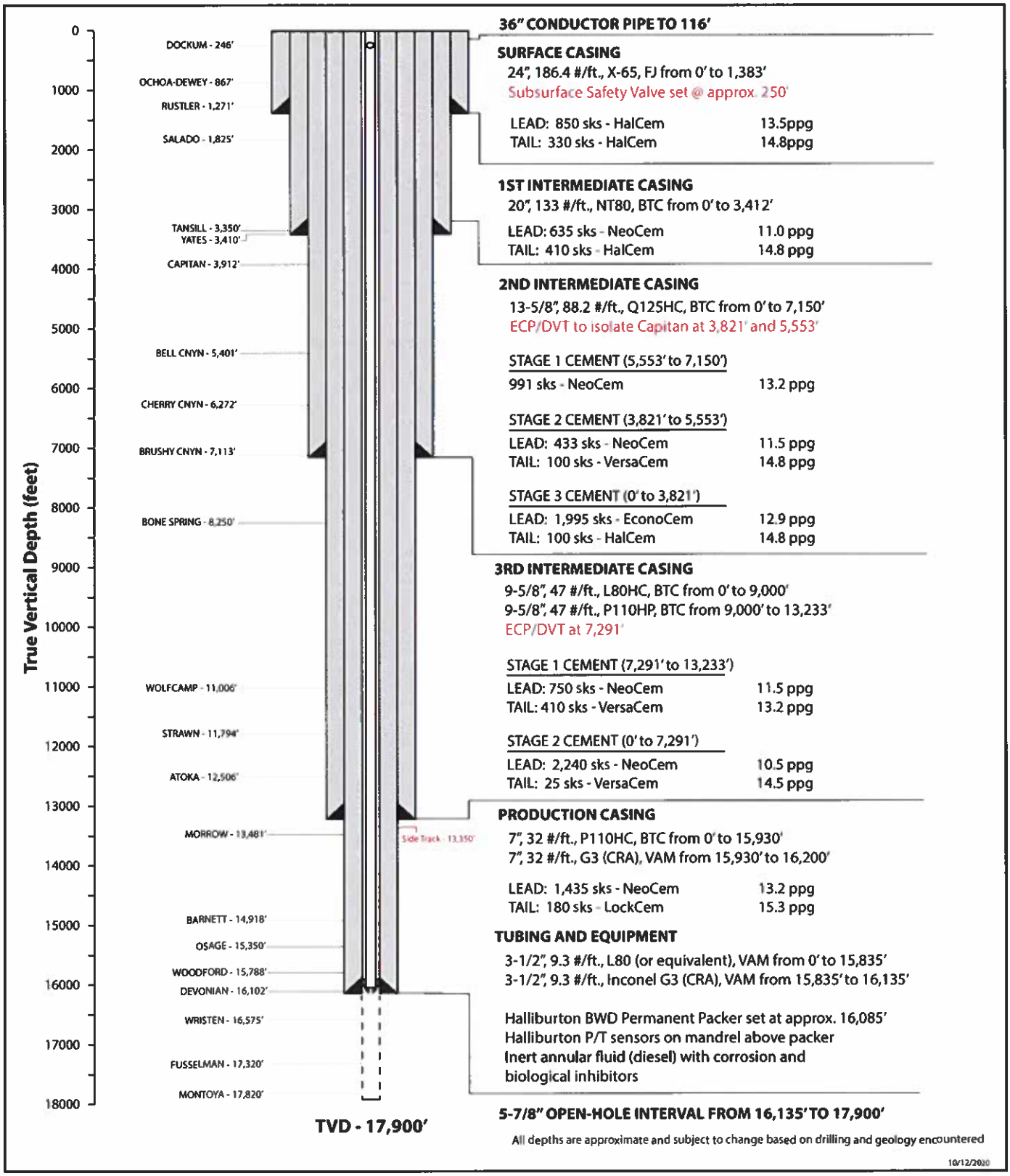


Figure 5. As-Drilled well design consisting of a surface string of casing, three intermediate strings , and a production string with associating tubing/equipment and cement types.

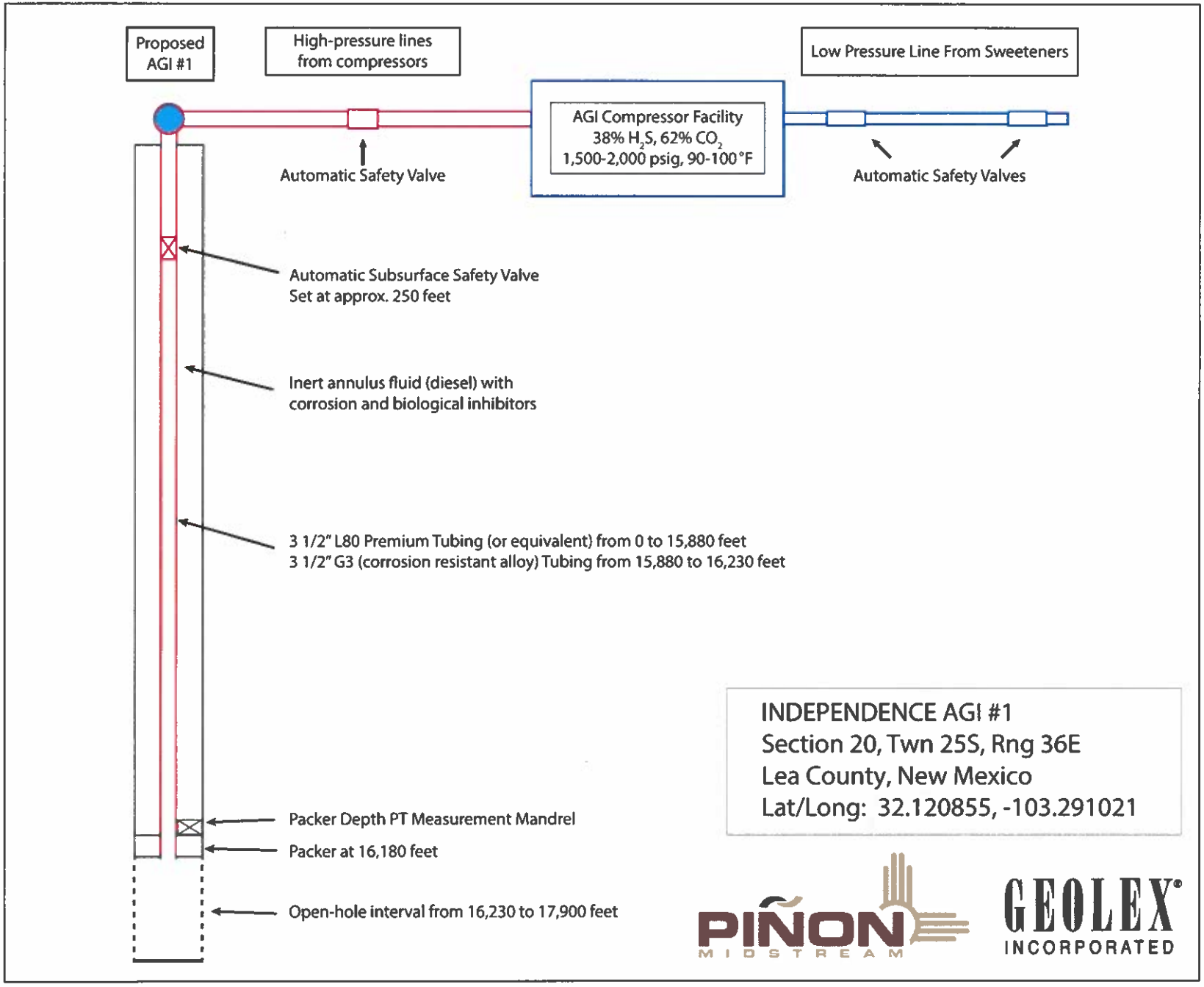


Figure 6. Schematic of surface facilities and Independence AGI #1

Dark Horse Gas Treatment Facility
Incident Command System Structure

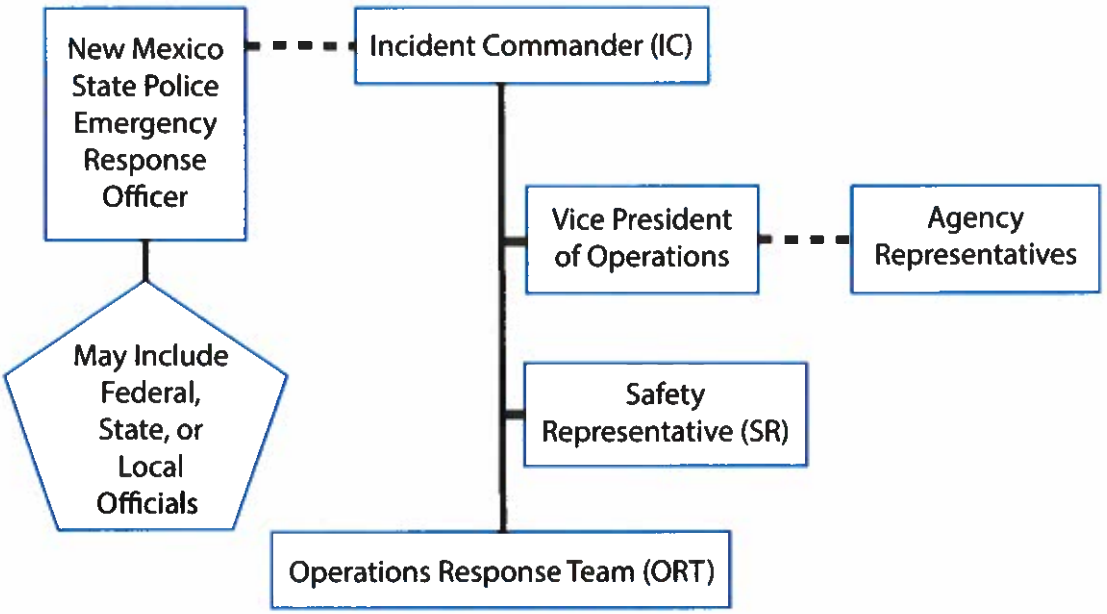


Figure 7. Incident Command System Structure for the Dark Horse Gas Processing Plant.

Dark Horse Gas Treatment Facility
Detailed Incident Command System Structure

Name	Title	Phone Number
Ryan Casburn	Plant Manager	830-460-1089
Casey Fix	VP of Operations	970-405-2614
Grant McAfee	Safety Coordinator	214-912-7945
Operations Response Team	Please Note: Operators work in shifts (24/7). The 8am-5pm shift, Monday-Friday, includes a manager, maintenance technicians, and 2 operators. **All Operations Response Team Personnel are Emergency Responders and are HAZWOPER Certified and fit tested for respirators and SCBA**	To be provided upon completion of facility
2 Individuals	Plant Operators	979-777-6319
0-2 Individuals	Maintenance Technicians	979-777-6319

Figure 8 - Detailed Incident Command System Structure

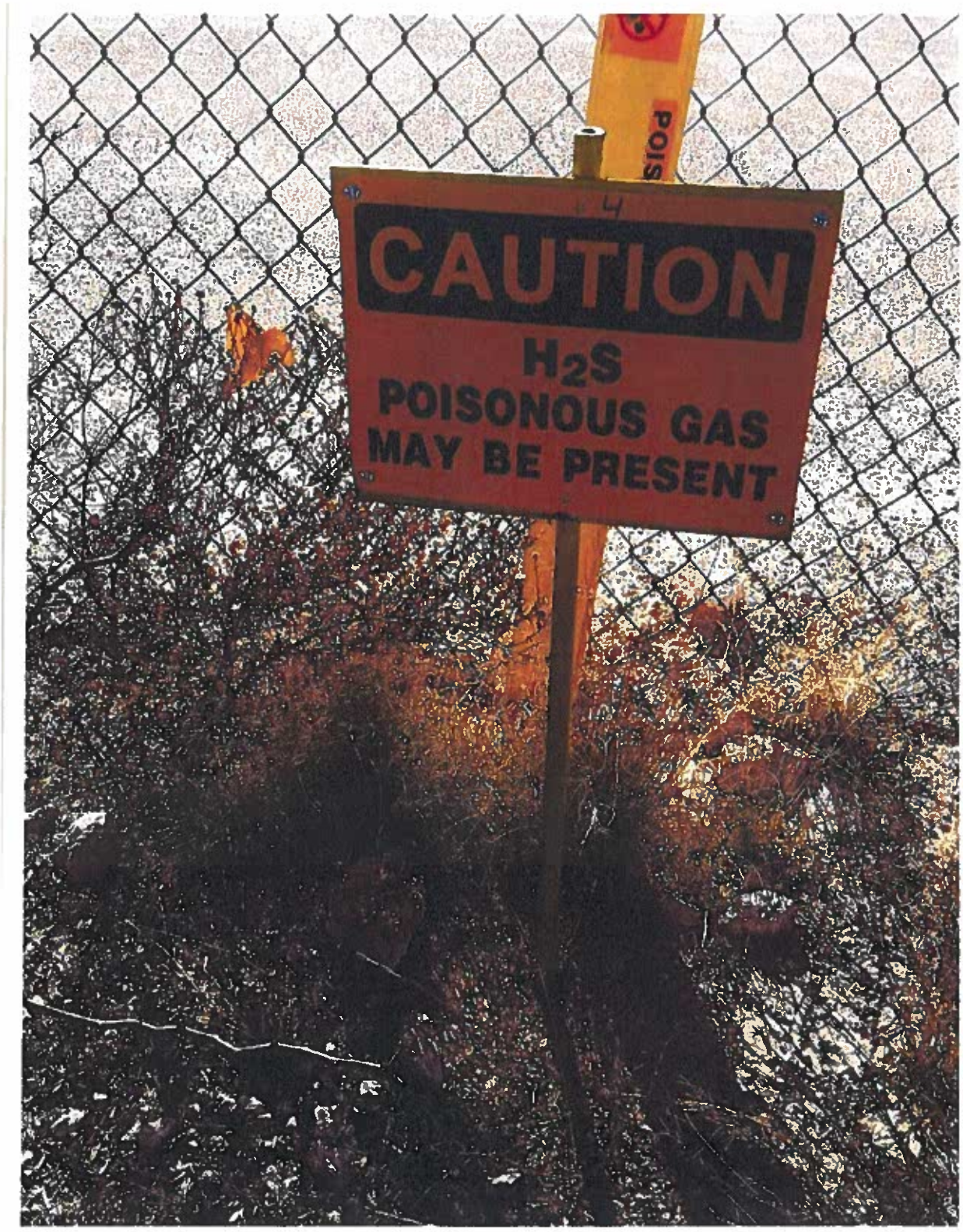


Figure 9. Examples of an H_2S warning sign placed at critical junctures between public areas and the ROE as well as throughout the facility.

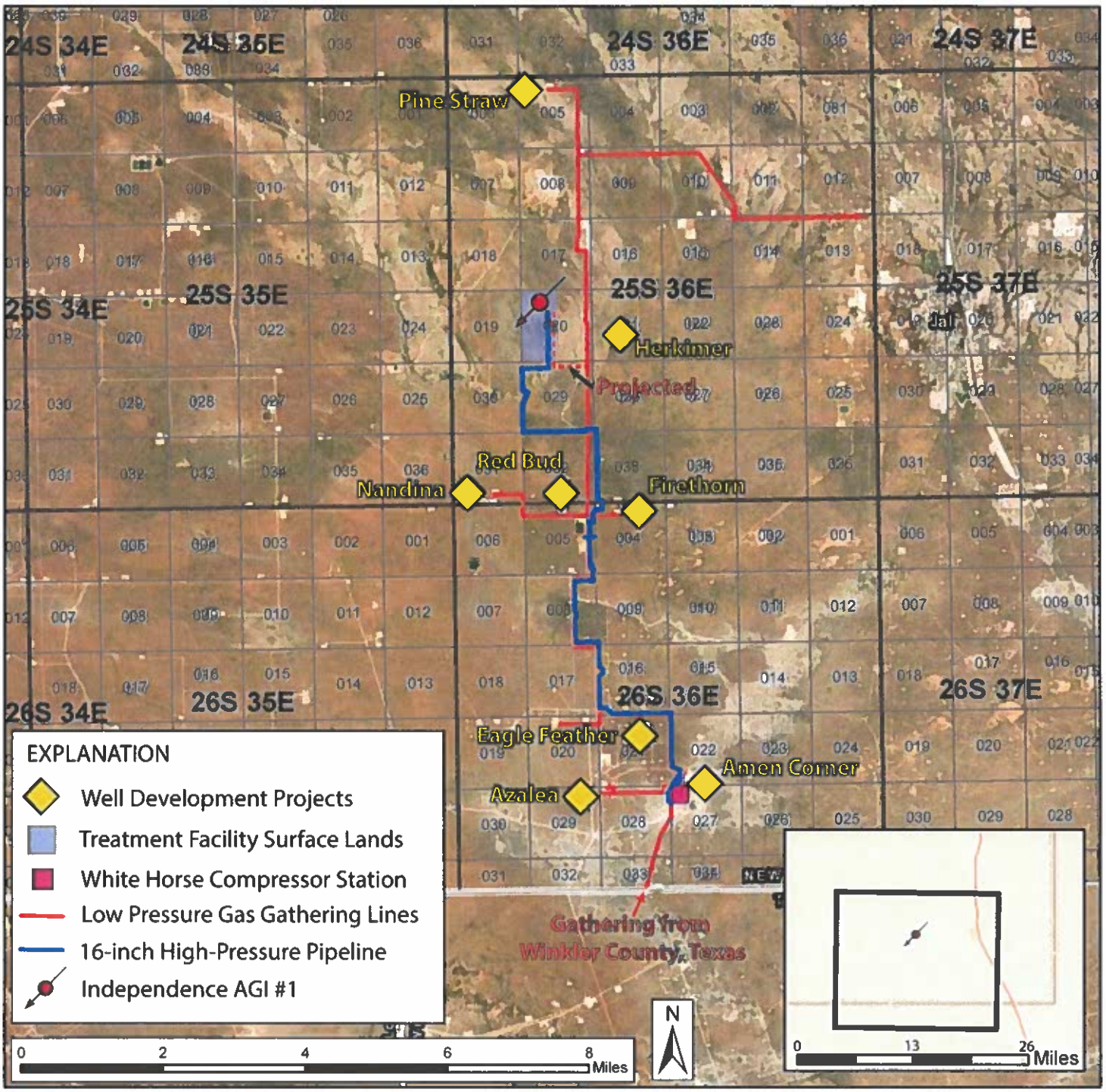


Figure 10. Location of gas gathering lines leading to the Dark Horse Gas Treatment Plant and White Horse Compression station. Low pressure lines either lead to the compressor station or directly to the treatment plant. Gas sent to the compressor station is sent to the treatment plant via a 16-inch high-pressure pipeline.

APPENDIX A
Immediate Action Plans

Dark Horse Gas Treatment Plant
Immediate Action Plans /Emergency Activation Procedures

LEVEL 1 ACTIVATION

ACTIVATING CONDITIONS:

- H_2S of 10 ppm or greater detected at any fixed monitor.

ALARMS AND AUTOMATED ACTIVATIONS:

- Localized flashing yellow lights or beacons and an intermittent horn are activated if any fixed monitor senses H_2S at 10 ppm or greater. The horn and flashing yellow lights are redundant systems which function independently of one another so that should one system fail, the other would remain active. These systems incorporate backup battery capabilities as recommended in API RP 55 which insure their operation in the event of a power failure.

- A computer in the Control Room and in the office of the Plant Supervisor establishes the location of the monitor(s), at the Plant or Wellsite, that has activated the alarm and/or flashing yellow beacons.

- All employees also wear personal monitors that sound an audible alarm at 10ppm H_2S or greater.

ACTIONS:

1. At the initial sound of an audible alarm or the sight of a flashing yellow beacon, responding Operator(s) in the vicinity of the alarm will put on 30-minute Self-Contained Breathing Apparatus (SCBA) and help any person(s) in distress evacuate to Emergency Assembly Area 1 and attempt to resolve the release.

2. All other personnel in the Plant complex shall immediately proceed, using the designated evacuation routes, to Emergency Assembly Area 1 (see Figure 3).

3. Control Room Operator and Plant Supervisor will be notified of the release. Plant Supervisor or designee will assume the role of Incident Commander (IC). Control Room Operator will remain in the control room, identify the location(s) of the alarms and monitor H_2S concentrations throughout the Plant.

4. If a perimeter monitor detects 10 ppm H_2S or greater, all entities and individuals located within the 500 ppm ROE (see Figure 4) will be notified by the IC or designee that a release is occurring and to stand by for further instructions. Entities will be advised to alert their employees and any third parties working for them, or imminently scheduled to work in the area, of the release and to leave the area and not return until further notice. (Phone numbers are listed in Appendix C).

5. If deemed necessary, Plant personnel as designated by the IC will contact local emergency response service providers (phone numbers provided in Appendix C).

6. All personnel will be accounted for at Emergency Assembly Area 1 using the Plant sign in sheet and air quality will be monitored for H_2S concentrations. If H_2S concentrations reach 10 ppm or greater at Emergency Assembly Area 1, all personnel will be evacuated to Emergency Assembly Area 2 using the designated routes (see Figures 3 and 4).

7. If the concentration of H_2S in the control room reaches 10 ppm, the Control Room Operator will also put on a 30-minute SCBA.

8. Responding Operator(s) wearing SCBAs will assess the location of the alarm and attempt to make an initial determination of its cause and rule out potential false alarms based on sensor malfunction or other conditions. If the cause of the release is a minor problem such as a packing or seal leak, the Operator(s) will attempt to take the necessary steps to correct the situation and eliminate the source of the release.

9. IC will designate secondary re-entry teams in 30-minute SCBA's to re-enter and resolve the situation. Re-entry will occur in 15-minute increments at the direction of the IC until the problem is resolved or Operators activate ESD.

10. If corrective actions are successful, and the release is resolved and monitored H_2S levels in the Plant return to less than 10 ppm, the IC or designee will signal all clear and personnel will be allowed to sign in and re-enter the Plant to resume work. If the release is not resolved and H_2S levels continue to rise, IC will initiate a Level 2 Response.

11. The IC will initiate and maintain a Chronologic Record of Events Log (see Appendix F).

12. The Plant Supervisor or designee will contact the Oil Conservation Division (OCD) district office within 4 hours of a release that activates the plan at Level 1. **Per 19.15.11.16 NMAC, notification of Contingency Plan implementation will be submitted to the OCD via form C-141 within 15 days of release.**

Dark Horse Gas Treatment Plant
Immediate Action Plans /Emergency Activation Procedures

LEVEL 2 ACTIVATION

ACTIVATING CONDITIONS:

- Corrective actions at Level 1 are unsuccessful.
- 90 ppm of H_2S or greater is detected for a sustained period at any fixed monitor.
- Operators activate ESD for an unexpected release not rapidly resolved.

ALARM AND AUTOMATED ACTIVATIONS:

- While activation occurs at 90 ppm, the automated ESD will trigger proactively at 40 ppm to minimize the potential for Level 2 events.

- Continuous facility-wide horn and flashing yellow lights will occur. The horn and flashing lights are redundant systems which function independently of one another so that should one system fail, the other would remain active. These systems incorporate backup battery capabilities as recommended in API RP 55 which insure their operation in the event of a power failure.

ACTIONS:

1. The responding Operator(s) will put on SCBAs and help any persons in distress to evacuate to Emergency Assembly Area 2 (see Figure 4).

2. The Plant Supervisor and the Control Room Operator will be notified. The Plant Supervisor, or designee will assume the role of IC. The Control Room Operator will put on SCBA, remain in the control room, and monitor H_2S concentrations throughout the Plant.

3. All personnel will be evacuated to Emergency Assembly Area 2 via designated routes (see Figure 4).

4. At Emergency Assembly Area 2, all personnel will be accounted for using the Plant sign-in list and air quality will continue to be monitored for H_2S at Emergency Assembly Area 2.

5. If two or more monitors within the AGI fenced area, or around the AGI compressor detect 90 ppm H_2S or greater, AGI compression will be shut down.

6. The Plant ESD can be activated at any time by the Dark Horse Treatment Plant Operators and is to be activated if efforts to control the release have failed, or if a catastrophic release has occurred.

7. Incident Command Center (ICC) will be established at Emergency Assembly Area 2.

8. A media staging area adjacent to Emergency Assembly Area 2 will be established and all media will be directed to it.

9. IC will designate personnel with H_2S monitors and emergency trailers to remain at Emergency Assembly Area 2. Trailers are to be deployed to roadblock locations along State Road 128 (SR128) outside of the 100 ppm ROE upon Level 3 activation.

10. Emergency Responders, local law enforcement, and state agencies, including the OCD District Office (phone numbers provided in Appendix C) will be notified of the release and the status of containment by the IC or designee.

11. Designated personnel will notify all entities, individuals, and producers within the 500 and 100 ppm ROE (phone numbers provided in Appendix C) of the nature of the release and the status of containment. All will be instructed to evacuate, or shelter in place, depending on the nature of the release and the prevailing wind conditions. They will be instructed to immediately alert all company personnel, third party contractors and/or service companies working in the area and those imminently scheduled to work in the area of the Plant evacuation status and advise them to leave and not enter, or re-enter the Plant vicinity until further notice.

12. Notifications by designated personnel will commence as follows:

    a) Anyone in immediate danger such as plant personal or contractors on site
    b) Appropriate Emergency Responders and local law enforcement
    c) All entities, individuals, and producers within in 500 and 100 ppm ROE
    d) State agencies (OCD District Office within four (4) hours of plan activation)

13. Re-entry will occur in full SCBA and at 15-minute increments at the direction of the IC until IC determines problem has been resolved or Operators activate ESD.

14. If release is resolved and monitored levels of H_2S in the Plant are less than 10 ppm, IC or designee may authorize personnel to return to the Plant.

15. All entities and individuals previously notified will be informed that the release has been resolved and advised of the current monitored H_2S levels.

16. If monitored H_2S levels at Emergency Assembly Area 2 exceed 10 ppm, all personnel will evacuate to General Emergency Assembly Area 3 via designated route (see Figure 4).

17. If the release is not resolved or H_2S levels continue to increase, the IC will initiate a Level 3 Response.

18. The IC will initiate and maintain a Chronologic Record of Events log. (Appendix F)

19. The Plant Supervisor or designee will contact the Oil Conservation Division (OCD) district office within 4 hours of a release that activates the plan at Level 1. **Per 19.15.11.16 NMAC, notification of Contingency Plan implementation will be submitted to the OCD via form C-141 within 15 days of release.**

Dark Horse Gas Treatment Plant
Immediate Action Plans /Emergency Activation Procedures

LEVEL 3 ACTIVATION

ACTIVATING CONDITIONS:

- Corrective actions at Level 2 are unsuccessful;
- H_2S concentrations reach 10 ppm or greater at Emergency Assembly Area 2;
- A catastrophic release, fire, explosion;
- A continuous release of maximum volume for 24 hours occurs;
- As per NMAC 19.15.11 there is indication of 100ppm H_2S in any defined public area, 500ppm at any public road, or 100 ppm at a distance greater than 3,000 feet from the site of the release.

ACTIONS:

1. All personnel shall have been or will immediately be evacuated to and accounted for at Emergency Assembly Area 3 using the Plant sign in sheet, and air quality will be monitored for H_2S concentrations (see Figure 4).

2. IC shall have activated or will immediately activate Plant ESD.

3. The ICC and media staging area shall be established and/or moved to Emergency Assembly Area 3.

4. Dispatch personnel with emergency trailers to move or establish designated Level 3 roadblocks on SR128 to prevent entry into the 100 ppm ROE (see Figure 4). Monitor H_2S concentrations at the roadblocks.

5. Local emergency responders, state agencies, including the OCD District Office, will be notified of the release and status of containment (phone numbers provided in Appendix C).

6. All individuals and entities within the 100 ppm ROE will already have been or shall be notified to evacuate or shelter in place. IC will review the status of evacuation, and make the final decision whether individuals within the 100 ppm ROE should evacuate or shelter in place based on, but not limited to H_2S concentration, wind conditions and whether a safe evacuation can be implemented. If individuals within the 100 ppm ROE are instructed to evacuate, IC will recommend an evacuation route. All entities will be instructed to immediately alert all company personnel, third party contractors and/or service companies working in the area and those imminently scheduled to work in the area of the Plant evacuation status and advise them to leave and not enter, or re-enter the Plant vicinity until further notice. All will be advised of the roadblocks deployed along SR128.

7. If escaping vapors have been ignited, the vapors should be allowed to continue to burn unless the fire endangers personnel, the public, other property, or other equipment.

8. Re-entry will occur in full SCBA and cascade breathing air systems at the direction of the IC until IC determines problem has been resolved.

9. Once release is resolved and monitored levels of H_2S in the Plant are less than 10 ppm, IC or designee may authorize personnel to sign in and return to the Plant.

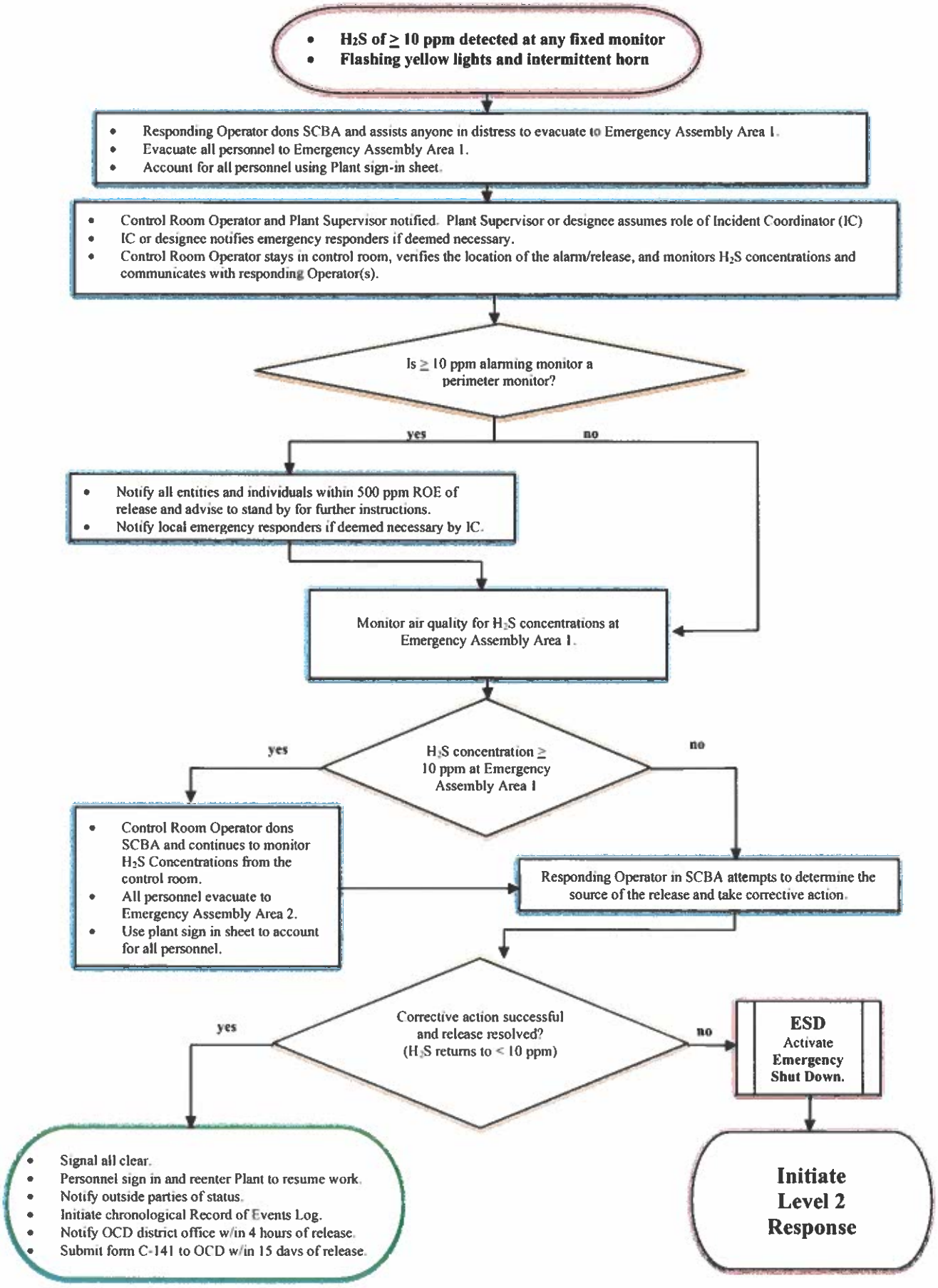
10. All entities and individuals previously notified will be informed that the release has been resolved and advised of the current monitored H_2S levels at the Plant. Roadblocks will be recalled and traffic will be restored.

11. The IC will initiate and maintain a Chronologic Record of Events log. (Appendix F)

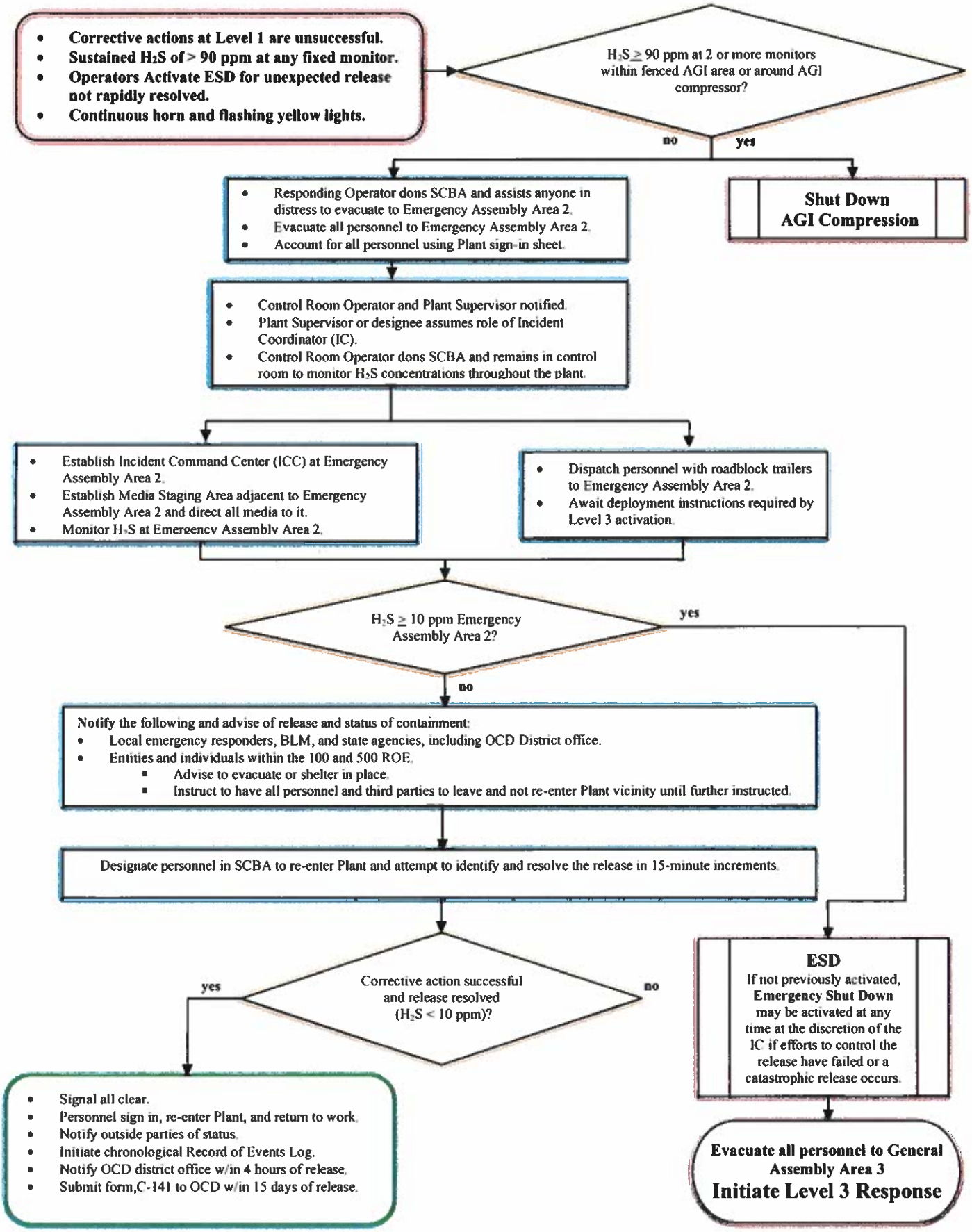
12. The Plant Supervisor or designee will contact the Oil Conservation Division (OCD) district office within 4 hours of a release that activates the plan at Level 1. **Per 19.15.11.16 NMAC, notification of Contingency Plan implementation will be submitted to the OCD via form C-141 within 15 days of release.**

APPENDIX B
Response Flow Diagrams

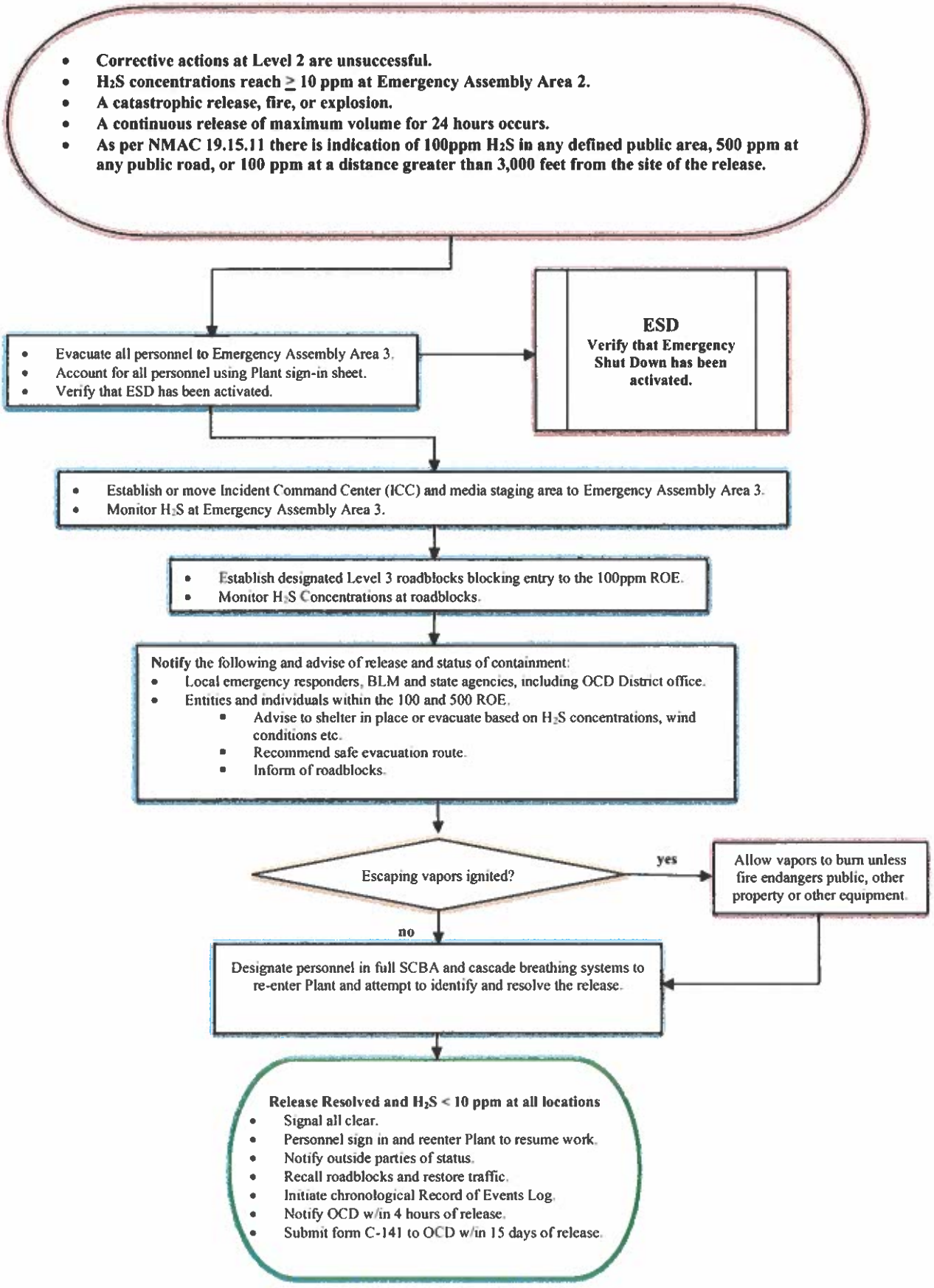
Dark Horse Gas Treatment Plant—Level 1 Activation Response Flow



Dark Horse Gas Treatment Plant —Level 2 Activation Response Flow



Dark Horse Treatment Plant—Level 3 Activation Response Flow



APPENDIX C
Telephone Numbers/Emergency Call List

RESIDENCES, BUSINESSES, PUBLIC RECEPTORS, AND PRODUCERS WITHIN THE 100 PPM ROE

Residence	Address	Phone
Manuel Ramirez - Resident Tommy Dinwiddie - Owner	309 W. NM Hwy. 128, Jal, NM 88252	575-369-5655 575-631-0385

Business	Business Location	Phone
BLUE STAR SERVICES, LLC	522 East Kansas, Jal NM 88252	575-725-8887
THOMAS OILFIELD SERVICES	273 W. NM Hwy. 128, Jal, NM 88252	903-806-0582
H&S RENTALS*	273 W. NM Hwy. 128, Jal, NM 88252	325- 245-7517*

*Contact BLUE STAR SERVICES, LLC to relay information to H&S RENTALS employees

Producers	Office Location	Office Phone
AMEREDEV OPERATING, LLC	2901 Via Fortuna, Suite 600, Austin, TX 78746	737-300-4700
BC & D OPERATING INC.	1008 West Broadway, Hobbs, NM 88240	575-393-2727 575-942-2700
CAZA OPERATING, LLC	200 N Loraine St, Suite 1550, Midland, TX 79701	432-682-7424
TAP ROCK OPERATING, LLC	523 Park Point Drive, Suite 200, Golden, CO 80401	720-772-5093
CHEVRON U S A INC.	6301 Deauville Blvd, Midland, TX 79706	432-687-7328
FULFER OIL & CATTLE LLC	P.O. Box 1224, Jal, NM 88252	505-935-9970
CHESAPEAKE OPERATING, INC.**	P.O. Box 11050, Midland, TX 79702	405-848-8000
ONEENERGY PARTNERS OPERATING, LLC**	2929 Allen Parkway, Suite 200, Houston, TX 77019	713-714-6482
COG OPERATING LLC**	600 W Illinois Ave, Midland, TX 79701	432-683-7443
DELEWARE ENERGY, LLC**	405 N. Marienfeld, Suite 200, Midland, TX 79701	432-685-7005
ENSERCH EXPLORATION INC.**	4849 Greenville Ave, Ste 1200, Dallas, TX 75206- Bad Address***	214-670-2820
TEXACO EXPLORATION & PRODUCTION INC**	P.O. Box 3109, Midland, TX - Bad Address***	915-688-4235

**Operators are not actively operating in the area, but own plugged or cancelled wells

***Address on file with NMOCD is inaccurate or operator is not active

PIÑON COMPANY INTERNAL NOTIFICATIONS

Name	Title	Phone Number
Ryan Casburn	Plant Manager	830-460-1089
Casey Fix	VP of Operations	970-405-2614
Grant McAfee	Safety Coordinator	214-912-7945
Operations Response Team	Please Note: Operators work in shifts (24/7). The 8am-5pm shift, Monday-Friday, includes a manager, maintenance technicians, and 2 operators. **All Operations Response Team Personnel are Emergency Responders and are HAZWOPER Certified and fit tested for respirators and SCBA**	To be provided upon completion of facility
2 Individuals	Plant Operators	979-777-6319
0-2 Individuals	Maintenance Technicians	979-777-6319

EMERGENCY RESPONDERS

Agency	Phone Number
Emergency Dispatch	911
Hobbs Fire & EMS Department	575-397-9308
Hobbs Police Department	575-397-9265
Jal Fire & EMS Department	575-395-2221
Eunice Fire & EMS Department	575-394-3258
New Mexico State Police (Hobbs)	575-392-5588
Lea County Sheriff's Office	575-396-3611
Hobbs-Lea Regional Medical Center	575-492-5000
Lubbock University Medical Center (UMC) (Level 1 Trauma Center)	800-345-9911
American Association of Poison Control Centers	800-222-1222
HELICOPTER SERVICES Lubbock University Medical Center Transfer to Level 1 Trauma Center	800-345-9911

COUNTY AND LOCAL LAW ENFORCEMENT AND PUBLIC AUTHORITIES AND LOCAL GOVERNMENT AGENCIES

Agency	Phone Number
Oil Conservation Division Santa Fe Office District 1 Office, Lea County (Hobbs)	 505-476-3460 575-370-3186
Local Emergency Planning Committee (LEPC) Lea County	 575-605-6561
New Mexico State Police (Hobbs)	575-392-5580
Lea County Sheriff's Office	575-396-3611
National Response Center (NRC) Response Center	800-424-8802
New Mexico Department of Homeland Security & Emergency Management (NMDHSEM)	505-476-9635
City of Jal City Manager	575-395-3340

APPENDIX D
Radius of Exposure (ROE) Calculations

Ameredev	Dark Horse Treatment Plant	ROE CALCULATIONS PURSUANT TO RULE 11

If data is provided in mole% use calculator below for getting ppm

Enter Mole % in cell C5	Mole %	ppm
Convert mole% to ppm	2.5	25000

If data is provided in mole fraction use calculator below for getting ppm

Enter Mole Fraction in cell C10	Mole Fraction	ppm
Convert mole fraction to ppm	0.025	25000

Use ppm derived from either of above calculations to input data below

Input Data Here		
	H_2S Concentration (ppm)	25000
	24 Hour Throughput (MMCFD)	120

The radius of exposure is calculated using the following equations:

100 ppm ROE calculation (as per 19 NMAC 15.11.7.K.1)

$$X_{100ppm} = [(1.589)(Conc_{H2S})(Q)]^{(0.6258)}$$

500 ppm ROE calculation (as per 19 NMAC 15.11.7.K.2)

$$X_{500ppm} = [(0.4546)(Conc_{H2S})(Q)]^{(0.6258)}$$

Where:

X = radius of exposure (ft)

$Conc_{H2S}$ = the decimal equivalent of the mole or volume fraction of H_2S in the gas

Q = daily plant throughput corrected to standard conditions (SCFD)

Plant parameters

Q =	100	MMSCFD =	100000000	SCFD		
$Conc_{H2S}$ =	25000	ppm =	2.5	Mole %=	0.025	Mole Fraction

ROE calculation:

X_{100ppm} = [(1.589)*(0.025)*(100000000)]^(0.6258)

X_{100ppm} = 13480 ft = **2.55 miles**

X_{500ppm} = [(0.4546)*(0.025)*(100000000)]^(0.6258)

X_{500ppm} = 6160 ft = **1.17 miles**

APPENDIX E
H_2S Plan Distribution List

H_2S PLAN DISTRIBUTION LIST

Nearby Residents

New Mexico Oil Conservation Division, Santa Fe Office

New Mexico Department of Public Safety (State Office)

Lea County LEPC/Emergency Manager*

City of Jal City Manager

Dark Horse Gas Treatment Plant Supervisor's Office

Dark Horse Gas Treatment Plant Control Room

Piñon Corporate Office

Dark Horse Gas Treatment Plant Emergency Trailers

New Mexico State Police, Hobbs Office

State of New Mexico Emergency Response Commission (SERC)

*Note: Lea County LEPC Emergency Manager will make and send copies of this plan to appropriate entities within his jurisdiction, including the Hobbs Fire Department.

APPENDIX F
Chronologic Record of Events Log

CHRONOLOGICAL RECORD OF EVENTS LOG

1. Incident Name	2. Operational Period (Date/Time) From: To:	UNIT/ACTIVITY LOG ICS 214

3. Individual Name	4. ICS Section	5. Assignment/Location

6. Activity Log	Page	of

TIME	MAJOR EVENTS

7. Prepared by:	Date/Time

Unit/Activity Log		ICS 214

APPENDIX G
NMOCD Form C-141

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources Department

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party	OGRID
Contact Name	Contact Telephone
Contact email	Incident # *(assigned by OCD)*
Contact mailing address	

Location of Release Source

Latitude _____ Longitude _____
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	Site Type
Date Release Discovered	API# *(if applicable)*

Unit Letter	Section	Township	Range	County

Surface Owner: ☐ State ☐ Federal ☐ Tribal ☐ Private (*Name:* _____)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

☐ Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
☐ Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	☐ Yes ☐ No
☐ Condensate	Volume Released (bbls)	Volume Recovered (bbls)
☐ Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
☐ Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)
Cause of Release		

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? ☐ Yes ☐ No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?	

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

☐ The source of the release has been stopped.

☐ The impacted area has been secured to protect human health and the environment.

☐ Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.

☐ All free liquids and recoverable materials have been removed and managed appropriately.

If all the actions described above have <u>not</u> been undertaken, explain why:

Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

<u>OCD Only</u>

Received by: _____ Date: _____

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	_____ (ft bgs)
Did this release impact groundwater or surface water?	☐ Yes ☐ No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ☐ No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes ☐ No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ☐ No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ☐ No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ☐ No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ☐ No
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ☐ No
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ☐ No
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ☐ No
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ☐ No
Did the release impact areas not on an exploration, development, production, or storage site?	☐ Yes ☐ No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

Characterization Report Checklist: ***Each of the following items must be included in the report.***

- ☐ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☐ Field data
- ☐ Data table of soil contaminant concentration data
- ☐ Depth to water determination
- ☐ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- ☐ Boring or excavation logs
- ☐ Photographs including date and GIS information
- ☐ Topographic/Aerial maps
- ☐ Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

APPENDIX H
Ameredev Development Project Wells

API	NAME	TYPE	STATUS	LATITUTE (NAD83)	LONGITUDE (NAD83)	DIRECTIONAL STATUS
30-025-46287	PINE STRAW 25 36 05 FEDERAL COM #091H	Oil	New	32.1660497	-103.2945647	H
30-025-46288	PINE STRAW 25 36 05 FEDERAL COM #101H	Oil	Active	32.1660499	-103.2947586	H
30-025-20381	HERKIMER BQF FEDERAL #001H	Oil	Active	32.113987	-103.2722168	H
30-025-46942	NANDINA 25 36 31 FEDERAL COM #075H	Oil	New	32.078945	-103.3019048	H
30-025-46943	NANDINA 25 36 31 FEDERAL COM #085H	Oil	New	32.078945	-103.3020339	H
30-025-45243	NANDINA 25 36 31 FEDERAL COM #105H	Oil	New	32.0801266	-103.3031326	H
30-025-45244	NANDINA 25 36 31 FEDERAL COM #125H	Oil	Active	32.0801266	-103.3030035	H
30-025-45246	NANDINA 25 36 31 FEDERAL COM #115H	Oil	New	32.0801266	-103.3030681	H
30-025-46219	NANDINA 25 36 31 FEDERAL COM #093H	Oil	New	32.0798496	-103.3078146	H
30-025-46222	NANDINA 25 36 31 FEDERAL COM #123H	Oil	New	32.0802072	-103.3073147	H
30-025-46191	NANDINA 25 36 31 FEDERAL COM #071H	Oil	New	32.080206	-103.3096875	H
30-025-46192	NANDINA 25 36 31 FEDERAL COM #081H	Oil	New	32.0802061	-103.309623	H
30-025-46194	NANDINA 25 36 31 FEDERAL COM #102H	Oil	New	32.0802061	-103.3094939	H
30-025-46221	NANDINA 25 36 31 FEDERAL COM #113H	Oil	New	32.0802072	-103.3073793	H
30-025-46145	NANDINA 25 36 31 FEDERAL COM #101H	Oil	Active	32.0802051	-103.3114632	H
30-025-46193	NANDINA 25 36 31 FEDERAL COM #091H	Oil	New	32.0802061	-103.3095584	H
30-025-46220	NANDINA 25 36 31 FEDERAL COM #103H	Oil	Active	32.0802071	-103.3074438	H
30-025-46217	NANDINA 25 36 31 FEDERAL COM #073H	Oil	New	32.0802073	-103.307121	H
30-025-46196	NANDINA 25 36 31 FEDERAL COM #121H	Oil	Active	32.0802052	-103.3113986	H
30-025-46146	NANDINA 25 36 31 FEDERAL COM #111H	Oil	New	32.0802052	-103.3113986	H
30-025-46195	NANDINA 25 36 31 FEDERAL COM #112H	Oil	Active	32.0802061	-103.3094293	H
30-025-46426	NANDINA 25 36 31 FEDERAL COM #126H	Oil	New	32.0801272	-103.3009212	H
30-025-46425	NANDINA 25 36 31 FEDERAL COM #095H	Oil	New	32.078945	-103.3019693	H
30-025-46334	NANDINA 25 36 31 FEDERAL COM #114H	Oil	Active	32.0802083	-103.305142	H
30-025-46393	NANDINA 25 36 31 FEDERAL COM #124H	Oil	New	32.1084818	-103.3052491	H
30-025-46433	NANDINA 25 36 31 FEDERAL COM #104H	Oil	New	32.0802082	-103.3052066	H
30-025-46197	NANDINA 25 36 31 FEDERAL COM #122H	Oil	New	32.0798489	-103.30941	H
30-025-46218	NANDINA 25 36 31 FEDERAL COM #083H	Oil	New	32.0802072	-103.3072501	H
30-025-46424	NANDINA 25 36 31 FEDERAL COM #087H	Oil	New	32.0789462	-103.2977725	H

30-025-48335	NANDINA 25 36 31 FEDERAL COM #107H	Oil	New	32.0801279	-103.2988712	H
30-025-44471	RED BUD 25 36 32 STATE COM #115H	Oil	Active	32.0801285	-103.286012	H
30-025-44470	RED BUD 25 36 32 STATE COM #105H	Oil	Active	32.080128	-103.2859479	H
30-025-47940	RED BUD 25 36 32 STATE COM #103H	Oil	New	32.0789464	-103.2903474	H
30-025-47363	RED BUD 25 36 32 STATE COM #108H	Oil	New	32.0789467	-103.2796685	H
30-025-47364	RED BUD 25 36 32 STATE COM #118H	Oil	New	32.0789467	-103.279604	H
30-025-47379	RED BUD 25 36 32 STATE COM #125H	Oil	New	32.0789461	-103.2867547	H
30-025-47380	RED BUD 25 36 32 STATE COM #128H	Oil	New	32.0789467	-103.2795394	H
30-025-47389	RED BUD 25 36 32 STATE COM #116H	Oil	New	32.0801283	-103.284237	H
30-025-47390	RED BUD 25 36 32 STATE COM #126H	Oil	New	32.0801283	-103.2841725	H
30-025-47391	RED BUD 25 36 32 STATE COM #106H	Oil	New	32.0801283	-103.2843016	H
30-025-47401	RED BUD 25 36 32 STATE COM #095H	Oil	New	32.0801283	-103.2843662	H
30-025-47421	RED BUD 25 36 32 STATE COM #085H	Oil	New	32.0801283	-103.2844307	H
30-025-47422	RED BUD 25 36 32 STATE COM #075H	Oil	New	32.0801283	-103.2844953	H
30-025-44961	FIRETHORN FEDERAL COM 26 36 04 #113H	Oil	Active	32.0801291	-103.2731308	H
30-025-38885	EAGLE FEATHER FEDERAL #002	Gas	Active	32.0341949	-103.2667923	V
30-025-44943	AMEN CORNER 26 36 27 STATE COM #091H	Oil	New	32.0221653	-103.2605415	H
30-025-44942	AMEN CORNER 26 36 27 STATE COM #121H	Oil	New	32.0221655	-103.2607997	H
30-025-44809	AMEN CORNER 26 36 27 STATE COM #105H	Oil	New	32.0209739	-103.2519577	H
30-025-44651	AMEN CORNER 26 36 27 STATE COM #115H	Oil	New	32.020974	-103.2520222	H
30-025-44652	AMEN CORNER 26 36 27 STATE COM #125H	Oil	New	32.0209742	-103.2520867	H
30-025-44104	AZALEA 26 36 28 STATE #111H	Oil	Active	32.020883	-103.2777528	H
30-025-44229	AZALEA 26 36 28 STATE #121Y	Oil	Active	32.020883	-103.2778167	H
30-025-44105	AZALEA 26 36 28 STATE #121	Oil	New	32.0208832	-103.2776884	V

APPENDIX J

SUMMARY OF COLLABORATION WITH LOCAL AND STATEAGENCIES AND ADDITIONAL INTERESTED PARTIES REGARDING H_2S CONTINGENCY PLANNING

&

COPIES OF ELECTRONIC MAIL CORRESPONDENCE WITH INTERESTED PARTIES

PIÑON MIDSTREAM H_2S CONTINGENCY PLAN – APPENDIX J

In developing the H_2S Contingency Plan for the Dark Horse Gas Treatment Facility, multiple agencies and interested parties were consulted to assure adequacy of the plan and accuracy of agency contact and preferred procedure. These entities and information regarding any associated correspondence are generally summarized in Table S1 below. We have also in this Appendix records of all emails regarding this collaboration in the remaining pages of this Appendix.

In addition to the agency's described in this Appendix, NMOCD staff (Santa Fe and District 1) will be provided complete copies of the proposed H_2S Contingency Plan for technical and compliance review. The final H_2S Contingency Plan will incorporate input from NMOCD and all interested parties shown in Table S1 will be provided updated and approved version of the plan for their records.

Table S1. General summary of correspondence and collaboration with relevant agencies and interested parties

Agency/Interested Party	H2S Plan Materials Provided?	Procedural Input Provided?	Agency Personnel Contacted		Correspondence Description
City of Jal, NM Government and Public Officials	Yes	Yes	Matt White Stephen Aldridge Pat Walter Mauricio Valeriano Van Myrick	(City Manager) (Mayor) (Fire Chief) (Police Chief) (Public Works)	Electronic Mail Correspondence – Periodic from 4/7/21 through 4/22/21 (included as attachments in this Appendix) Teleconference Discussion 4/22/21
Lea County Emergency Management	Yes	Yes	Lorenzo Velasquez	(Emergency Mngr.)	Electronic Mail Correspondence – Periodic from 4/7/21 through 4/28/21 (included as attachments in this Appendix)
New Mexico Department of Homeland Security and Emergency Management (NM DHSEM)	Yes	Yes	Kelly Hamilton Susan Walker Julie Jolly	(Deputary Secretary) (Response & Recovery) (HAZMAT Coordinator)	Electronic Mail Correspondence – Periodic from 4/7/21 through 5/4/21 (included as attachments in this Appendix) Teleconference Discussion on 5/4/21
Lea County Sheriff's Office	Yes	Yes	Corey Helton Connie Balderaz	(Sheriff) (Administration)	Electronic Mail Correspondence – Periodic from 4/7/21 through 4/30/21 Discussions with agency personnel via telephone on 4/26/21
New Mexico State Police Hobbs District Office	Yes	Yes	Sgt. Pedro Estrada Sgt. Edgar Pio Carly Navareette	 (Administration)	Electronic Mail Correspondence (4/19/21) Discussions with agency personnel via telephone on 4/26/21
Businesses within Potentially Affected Area	Yes	Yes	Jared Smith Haden Burchard Hank Guillotte	(Blue Star Services, LLC) (H&S Rentals) (Thomas Oilfield Services)	Electronic Mail Correspondence (5/7/21) Discussions with company personnel via telephone on week of 3/15/21
Residential Property Owner within Potentially Affected Area	Yes	Yes	Thomas Dinwiddie Manuel Ramirez	(Property Owner) (Resident)	Electronic Mail Correspondence on 4/23/21 Telephone discussion (T. Dinwiddie) on 4/4/21 and 4/16/21

LOCAL GOVERNMENT AND PUBLIC OFFICIALS
CITY OF JAL, NEW MEXICO

(Electronic Mail Correspondence)

dwhite@geolex.com

From: dwhite@geolex.com
Sent: Wednesday, April 7, 2021 11:56 AM
To: citymanager@cityofjal.us
Cc: 'Alberto A. Gutierrez'; sflores@geolex.com
Subject: Pinon Midstream - Gas Treating Facility
Attachments: Pinon H2S Plan - Selected Material.pdf

Good day Mr. White,

My name is David White with Geolex, Inc., and I am reaching out to you on behalf of Piñon Midstream, LLC, who is constructing a gas-treatment facility (Dark Horse Treatment Facility) approximately six (6) miles west of Jal, New Mexico. We (Geolex) have been aiding Piñon in the development of a Hydrogen Sulfide (H_2S) Contingency Plan, which will direct Piñon's actions in the event of an un-planned H_2S release at the facility. The primary purpose of this plan is to assure a coordinated and efficient procedure to alert and protect operating personnel and the public, as well as minimize environmental hazard and property damage in the event of an un-planned release of H_2S gas.

As part of the city of Jal administration, we would like to provide you with pertinent details regarding the plan, as well as an opportunity to discuss any concerns or questions you may have. In the unlikely event that an un-planned release does occur, we would like state and local authorities to be aware of the actions the plant operators will take, as well as the potential involvement of any authorities. Furthermore, you or your organization will be contacted by phone should the contingency plan be activated.

Attached you will find a brief summary, which provides an introduction to the proposed Dark Horse facility and generally outlines the actions to be taken in response to an un-planned H_2S release. Geolex is currently finalizing the complete H_2S Contingency Plan and will provide a copy for your review upon completion.

We welcome any input and are available for any questions you may have. If you would prefer, a call or Zoom meeting can be set up to discuss the contingency plan in real time, or you may reach us directly at (505)842-8000. Additionally, if there is another individual within your organization that should be the primary contact regarding this plan, we would appreciate it if you directed us to them.

Thank you for your time.

Regards,

David A. White, M.S.
Geolex, Incorporated®
500 Marquette Avenue, NW Suite 1350
Albuquerque, NM 87102
(505)842-8000 Office
(859)967-7231 Cell

dwhite@geolex.com

From: Matt White <citymanager@cityofjal.us>
Sent: Wednesday, April 7, 2021 12:20 PM
To: dwhite@geolex.com
Cc: 'Alberto A. Gutierrez'; sflores@geolex.com
Subject: RE: Pinon Midstream - Gas Treating Facility

Flag Status: Flagged

David, Thanks for the information. I appreciate you reaching out and would like to have a meeting to discuss face to face. Our Fire Chief is Pat Walters at p.walter@cityofjal.us, 575-441-1990, Police Chief is Mauricio Valeriano at m.valeriano@cityofjal.us, 575-652-7517, and Public Works, Van Myrick, at vanmyrick@cityofjal.us, 575-441-6926. We do have our municipal water supply directly south of your station by about 3 miles. The public works department is in that area every day.
Thanks,
Matt White
575-441-5965

From: dwhite@geolex.com <dwhite@geolex.com>
Sent: Wednesday, April 7, 2021 11:56 AM
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Thank you for your time.

dwhite@geolex.com

From: dwhite@geolex.com
Sent: Friday, April 9, 2021 10:36 AM
To: 'Matt White'
Cc: 'Alberto A. Gutierrez'; sflores@geolex.com
Subject: RE: Pinon Midstream - Gas Treating Facility

Good morning Mr. White,

Thanks so much for the additional information. If possible, maybe we can have a Zoom meeting to discuss face-to-face early next week. Let me know what works best for your schedule and I'll make it happen on our end. Additionally, would you like to have those parties you specifically mentioned participate in this meeting? Our intent was to connect with each of those entities, but it may be more constructive to get everyone on board for this discussion. I look forward to meeting you and hope you have a great day.

Regards,

David A. White, M.S.
Geolex, Incorporated®
500 Marquette Avenue, NW Suite 1350
Albuquerque, NM 87102
(505)842-8000 Office
(859)967-7231 Cell

From: Matt White <citymanager@cityofjal.us>
Sent: Wednesday, April 7, 2021 12:20 PM
To: dwhite@geolex.com
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Subject: RE: Pinon Midstream - Gas Treating Facility

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Thanks,
Matt White
575-441-5965

From: dwhite@geolex.com <dwhite@geolex.com>
Sent: Wednesday, April 7, 2021 11:56 AM
To: Matt White <citymanager@cityofjal.us>

dwhite@geolex.com

From: Matt White <citymanager@cityofjal.us>
Sent: Monday, April 12, 2021 12:01 PM
To: dwhite@geolex.com; Mauricio Valeriano; Stephen Aldridge; Pat Walter; Van Myrick
Cc: 'Alberto A. Gutierrez'; sflores@geolex.com
Subject: RE: Pinon Midstream - Gas Treating Facility

David,
I will be on vacation most of this week. How about a meeting anytime on the 22nd or morning of the 23rd.
Thanks Matt

From: dwhite@geolex.com <dwhite@geolex.com>
Sent: Friday, April 9, 2021 10:36 AM
To: Matt White <citymanager@cityofjal.us>
Cc: 'Alberto A. Gutierrez' <aag@geolex.com>; sflores@geolex.com
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Regards,

David A. White, M.S.
Geolex, Incorporated
500 Marquette Avenue, NW Suite 1350
Albuquerque, NM 87102
(505)842-8000 Office
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To: dwhite@geolex.com
Cc: 'Alberto A. Gutierrez' <aag@geolex.com>; sflores@geolex.com
Subject: RE: Pinon Midstream - Gas Treating Facility

dwhite@geolex.com

From: dwhite@geolex.com
Sent: Thursday, April 15, 2021 11:58 AM
To: 'Matt White'; 'Mauricio Valeriano'; 'Stephen Aldridge'; 'Pat Walter'; 'Van Myrick'
Cc: 'Alberto A. Gutierrez'; sflores@geolex.com
Subject: RE: Pinon Midstream - Gas Treating Facility

Good day Mr. White,

The 22nd of April would be preferable, as part of our team will be travelling on the 23rd. If you have availability, anytime in the afternoon should work well for us. Let us know and we'll assure we can make it work. Again, we greatly appreciate your time with this and look forward to meeting and discussing this with you and your team.

Regards,

David A. White, M.S.
Geolex, Incorporated
500 Marquette Avenue, NW Suite 1350
Albuquerque, NM 87102
(505)842-8000 Office
(859)967-7231 Cell

From: Matt White <citymanager@cityofjal.us>
Sent: Monday, April 12, 2021 12:01 PM
To: dwhite@geolex.com; Mauricio Valeriano <m.valeriano@cityofjal.us>; Stephen Aldridge <mayor@cityofjal.us>; Pat Walter <p.walter@cityofjal.us>; Van Myrick <vanmyrick@cityofjal.us>
Cc: 'Alberto A. Gutierrez' <aag@geolex.com>; sflores@geolex.com
Subject: RE: Pinon Midstream - Gas Treating Facility

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Sent: Friday, April 9, 2021 10:36 AM
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Cc: 'Alberto A. Gutierrez' <aag@geolex.com>; sflores@geolex.com
Subject: RE: Pinon Midstream - Gas Treating Facility

Good morning Mr. White,

dwhite@geolex.com

From: Matt White <citymanager@cityofjal.us>
Sent: Thursday, April 15, 2021 4:43 PM
To: dwhite@geolex.com
Cc: Mauricio Valeriano; Stephen Aldridge; Pat Walter; Van Myrick; Alberto A. Gutierrez; sflores@geolex.com
Subject: Re: Pinon Midstream - Gas Treating Facility

David
I am on leave this week will get back with you Monday
Matt

Sent from my iPhone

> On Apr 15, 2021, at 11:58 AM, dwhite@geolex.com wrote:
>
> Good day Mr. White,
>
> The 22nd of April would be preferable, as part of our team will be travelling on the 23rd. If you have availability, anytime in the afternoon should work well for us. Let us know and we'll assure we can make it work. Again, we greatly appreciate your time with this and look forward to meeting and discussing this with you and your team.
>
> Regards,
>
> David A. White, M.S.
> Geolex, Incorporated
> 500 Marquette Avenue, NW Suite 1350
> Albuquerque, NM 87102
> (505)842-8000 Office
> (859)967-7231 Cell
>
> PRIVILEGED & CONFIDENTIAL
> This message and attachment(s) contain confidential information belonging to the sender which is intended for the sole use of the individual(s) or entity named above. If you receive this message in error, you are hereby notified that any disclosure, copying, distribution, resending, forwarding or taking of any action in reliance on the contents of this email and/or any attachment(s) is strictly prohibited. If you have received this message in error, please notify the sender via return email and permanently delete this message and any attachment(s) from any computer(s).
>
> **From:** Matt White <citymanager@cityofjal.us>
> **Sent:** Monday, April 12, 2021 12:01 PM
> **To:** dwhite@geolex.com; Mauricio Valeriano <m.valeriano@cityofjal.us>; Stephen Aldridge <mayor@cityofjal.us>; Pat Walter <p.walter@cityofjal.us>; Van Myrick <vanmyrick@cityofjal.us>
> **Cc:** 'Alberto A. Gutierrez' <aag@geolex.com>; sflores@geolex.com
> **Subject:** RE: Pinon Midstream - Gas Treating Facility

dwhite@geolex.com

From: Matt White <citymanager@cityofjal.us>
Sent: Monday, April 19, 2021 11:38 AM
To: dwhite@geolex.com; Mauricio Valeriano; Stephen Aldridge; Pat Walter; Van Myrick
Cc: 'Alberto A. Gutierrez'; sflores@geolex.com
Subject: RE: Pinon Midstream - Gas Treating Facility

Dave,
How about 0200 PM on the 22nd.
Thanks matt

From: dwhite@geolex.com <dwhite@geolex.com>
Sent: Thursday, April 15, 2021 11:58 AM
To: Matt White <citymanager@cityofjal.us>; Mauricio Valeriano <m.valeriano@cityofjal.us>; Stephen Aldridge <mayor@cityofjal.us>; Pat Walter <p.walter@cityofjal.us>; Van Myrick <vanmyrick@cityofjal.us>
Cc: 'Alberto A. Gutierrez' <aag@geolex.com>; sflores@geolex.com
Subject: RE: Pinon Midstream - Gas Treating Facility

Good day Mr. White,

The 22nd of April would be preferable, as part of our team will be travelling on the 23rd. If you have availability, anytime in the afternoon should work well for us. Let us know and we'll assure we can make it work. Again, we greatly appreciate your time with this and look forward to meeting and discussing this with you and your team.

Regards,

David A. White, M.S.
Geolex, Incorporated®
500 Marquette Avenue, NW Suite 1350
Albuquerque, NM 87102
(505)842-8000 Office
(859)967-7231 Cell

From: Matt White <citymanager@cityofjal.us>
Sent: Monday, April 12, 2021 12:01 PM
To: dwhite@geolex.com; Mauricio Valeriano <m.valeriano@cityofjal.us>; Stephen Aldridge <mayor@cityofjal.us>; Pat Walter <p.walter@cityofjal.us>; Van Myrick <vanmyrick@cityofjal.us>
Cc: 'Alberto A. Gutierrez' <aag@geolex.com>; sflores@geolex.com
Subject: RE: Pinon Midstream - Gas Treating Facility

David,
I will be on vacation most of this week. How about a meeting anytime on the 22nd or morning of the 23rd.

dwhite@geolex.com

From: dwhite@geolex.com
Sent: Monday, April 19, 2021 3:16 PM
To: 'Matt White'; 'Mauricio Valeriano'; 'Stephen Aldridge'; 'Pat Walter'; 'Van Myrick'
Cc: 'Alberto A. Gutierrez'; sflores@geolex.com
Subject: RE: Pinon Midstream - Gas Treating Facility

That will work great for us. I'll set up the meeting and send out the invites for that time.

Regards,

David A. White, M.S.
(859)967-7231 Cell

From: Matt White <citymanager@cityofjal.us>
Sent: Monday, April 19, 2021 11:38 AM
To: dwhite@geolex.com; Mauricio Valeriano <m.valeriano@cityofjal.us>; Stephen Aldridge <mayor@cityofjal.us>; Pat Walter <p.walter@cityofjal.us>; Van Myrick <vanmyrick@cityofjal.us>
Cc: 'Alberto A. Gutierrez' <aag@geolex.com>; sflores@geolex.com
Subject: RE: Pinon Midstream - Gas Treating Facility

Dave,
How about 0200 PM on the 22nd.
Thanks matt

From: dwhite@geolex.com <dwhite@geolex.com>
Sent: Thursday, April 15, 2021 11:58 AM
To: Matt White <citymanager@cityofjal.us>; Mauricio Valeriano <m.valeriano@cityofjal.us>; Stephen Aldridge <mayor@cityofjal.us>; Pat Walter <p.walter@cityofjal.us>; Van Myrick <vanmyrick@cityofjal.us>
Cc: 'Alberto A. Gutierrez' <aag@geolex.com>; sflores@geolex.com
Subject: RE: Pinon Midstream - Gas Treating Facility

Good day Mr. White,

The 22nd of April would be preferable, as part of our team will be travelling on the 23rd. If you have availability, anytime in the afternoon should work well for us. Let us know and we'll assure we can make it work. Again, we greatly appreciate your time with this and look forward to meeting and discussing this with you and your team.

Regards,

David A. White, M.S.
Geolex, Incorporated

dwhite@geolex.com

From: dwhite@geolex.com
Sent: Thursday, April 22, 2021 3:44 PM
To: 'Matt White'; 'Mauricio Valeriano'; 'Stephen Aldridge'; 'Pat Walter'; 'Van Myrick'
Cc: 'Alberto A. Gutierrez'; sflores@geolex.com
Subject: RE: Pinon Midstream - Gas Treating Facility
Attachments: Independence AGI #1 Well Design.pdf; 4_22_2021 Pinon H2S Plan - Selected Material.pdf

Good afternoon all,

Thanks again for taking the time to speak with us today. It was a great pleasure to be able to discuss this project with you all and we look forward to any insight and input you may have. Hopefully, in the near future we'll be able to have these discussions face to face. As requested, we are providing in this correspondence the materials we presented today, as well as the detailed schematic of the AGI well that will be operated at the Piñon Midstream Gas Treatment Facility (see attached). As the well is currently being drilled, you will be provided with a final as-built version of this schematic and the complete H_2S Contingency Plan, upon completion.

For the final H_2S Contingency Plan that will be submitted to NMOCD, your agency will be included as an interested party who will receive notification of any relevant activation of the plan. As such, please feel free to provide any specific contact information that should be utilized for this notification.

Again, it was a great pleasure speaking with you today. Please feel free to reach anytime if you have questions or wish to discuss further.

Regards,

David A. White, M.S.
Geolex, Incorporated®
500 Marquette Avenue, NW Suite 1350
Albuquerque, NM 87102
(505)842-8000 Office
(859)967-7231 Cell

From: Matt White <citymanager@cityofjal.us>
Sent: Monday, April 19, 2021 11:38 AM
To: dwhite@geolex.com; Mauricio Valeriano <m.valeriano@cityofjal.us>; Stephen Aldridge <mayor@cityofjal.us>; Pat Walter <p.walter@cityofjal.us>; Van Myrick <vanmyrick@cityofjal.us>
Cc: 'Alberto A. Gutierrez' <aag@geolex.com>; sflores@geolex.com
Subject: RE: Pinon Midstream - Gas Treating Facility

Dave,
How about 0200 PM on the 22nd.

dwhite@geolex.com

From: Matt White <citymanager@cityofjal.us>
Sent: Thursday, April 22, 2021 4:42 PM
To: dwhite@geolex.com; Mauricio Valeriano; Stephen Aldridge; Pat Walter; Van Myrick
Cc: 'Alberto A. Gutierrez'; sflores@geolex.com
Subject: RE: Pinon Midstream - Gas Treating Facility

Thanks again David for briefing us. We apricate you reaching out.
Please let me know if we can help with anything.
matt

From: dwhite@geolex.com <dwhite@geolex.com>
Sent: Thursday, April 22, 2021 3:44 PM
To: Matt White <citymanager@cityofjal.us>; Mauricio Valeriano <m.valeriano@cityofjal.us>; Stephen Aldridge <mayor@cityofjal.us>; Pat Walter <p.walter@cityofjal.us>; Van Myrick <vanmyrick@cityofjal.us>
Cc: 'Alberto A. Gutierrez' <aag@geolex.com>; sflores@geolex.com
Subject: RE: Pinon Midstream - Gas Treating Facility

Good afternoon all,

Thanks again for taking the time to speak with us today. It was a great pleasure to be able to discuss this project with you all and we look forward to any insight and input you may have. Hopefully, in the near future we'll be able to have these discussions face to face. As requested, we are providing in this correspondence the materials we presented today, as well as the detailed schematic of the AGI well that will be operated at the Piñon Midstream Gas Treatment Facility (see attached). As the well is currently being drilled, you will be provided with a final as-built version of this schematic and the complete H_2S Contingency Plan, upon completion.

For the final H_2S Contingency Plan that will be submitted to NMOCD, your agency will be included as an interested party who will receive notification of any relevant activation of the plan. As such, please feel free to provide any specific contact information that should be utilized for this notification.

Again, it was a great pleasure speaking with you today. Please feel free to reach anytime if you have questions or wish to discuss further.

Regards,

David A. White, M.S.
Geolex, Incorporated
500 Marquette Avenue, NW Suite 1350
Albuquerque, NM 87102
(505)842-8000 Office
(859)967-7231 Cell

LEA COUNTY EMERGENCY MANAGMENT

(Electronic Mail Correspondence)

dwhite@geolex.com

From: dwhite@geolex.com
Sent: Wednesday, April 7, 2021 1:49 PM
To: 'lvelasquez@leacounty.net'
Cc: 'Alberto A. Gutierrez (aag@geolex.com)'; sflores@geolex.com
Subject: Piñon Midstream - Gas Treating Facility
Attachments: Pinon H2S Plan - Selected Material.pdf

Good day Mr. Velasquez,

My name is David White with Geolex, Inc., and I am reaching out to you on behalf of Piñon Midstream, LLC, who is constructing a gas-treatment facility (Dark Horse Treatment Facility) approximately six (6) miles west of Jal, New Mexico. We (Geolex) have been aiding Piñon in the development of a Hydrogen Sulfide (H_2S) Contingency Plan, which will direct Piñon's actions in the event of an un-planned H_2S release at the facility. The primary purpose of this plan is to assure a coordinated and efficient procedure to alert and protect operating personnel and the public, as well as minimize environmental hazard and property damage in the event of an un-planned release of H_2S gas.

As part of Lea County Emergency Management, we would like to provide you with pertinent details regarding the plan, as well as an opportunity to discuss any concerns or questions you may have. In the unlikely event that an un-planned release does occur, we would like state and local authorities to be aware of the actions the plant operators will take, as well as the potential involvement of any authorities. Furthermore, you or your organization will be contacted by phone should the contingency plan be activated.

Attached you will find a brief summary, which provides an introduction to the proposed Dark Horse facility and generally outlines the actions to be taken in response to an un-planned H_2S release. Geolex is currently finalizing the complete H_2S Contingency Plan and will provide a copy for your review upon completion.

We welcome any input and are available for any questions you may have. If you would prefer, a call or Zoom meeting can be set up to discuss the contingency plan in real time, or you may reach us directly at (505)842-8000. Additionally, if there is another individual within your organization that should be the primary contact regarding this plan, we would appreciate it if you directed us to them.

Thank you for your time.

Regards,

David A. White, M.S.
Geolex, Incorporated®
500 Marquette Avenue, NW Suite 1350
Albuquerque, NM 87102
(505)842-8000 Office
(859)967-7231 Cell

dwhite@geolex.com

From: dwhite@geolex.com
Sent: Monday, April 19, 2021 10:19 AM
To: 'lvelasquez@leacounty.net'
Cc: 'Alberto A. Gutierrez (aag@geolex.com)'; sflores@geolex.com
Subject: RE: Piñon Midstream - Gas Treating Facility
Attachments: Pinon H2S Plan - Selected Material.pdf

Mr. Velasquez,

I hope you are doing well and had a wonderful weekend. I'm reaching out again regarding the planned Piñon Midstream, LLC gas-treatment facility described in my previous correspondence (included below). As previously mentioned, we (Geolex, Inc.) have been assisting Piñon in developing a Hydrogen Sulfide Contingency Plan to ensure operations follow an efficient procedure to alert and protect operating personnel and the public, and minimize environmental hazard and property damage, in the event of an un-planned release of hydrogen sulfide (H_2S).

As part of Lea County Emergency Management, we would like to assure you are provided all the information you need and have ample opportunity to discuss any concerns or questions you may have. In this correspondence, I've attached a brief summary that introduces the planned facility and generally outlines the H_2S Contingency Plan. If you would like to receive a full copy of the H_2S Contingency Plan draft, or would like to discuss via Zoom teleconferencing, please don't hesitate to let us know and we will work to arrange a meeting. Additionally, if there is another individual within your organization that should be contacted regarding this plan, we would appreciate if you directed us to them.

Regards,

David A. White, M.S.
(859)967-7231 Cell

From: dwhite@geolex.com <dwhite@geolex.com>
Sent: Wednesday, April 7, 2021 1:49 PM
To: 'lvelasquez@leacounty.net' <lvelasquez@leacounty.net>
Cc: 'Alberto A. Gutierrez (aag@geolex.com)' <aag@geolex.com>; sflores@geolex.com
Subject: Piñon Midstream - Gas Treating Facility

Good day Mr. Velasquez,

My name is David White with Geolex, Inc., and I am reaching out to you on behalf of Piñon Midstream, LLC, who is constructing a gas-treatment facility (Dark Horse Treatment Facility) approximately six (6) miles west of Jal, New Mexico. We (Geolex) have been aiding Piñon in the development of a Hydrogen Sulfide (H_2S) Contingency Plan, which will direct Piñon's actions in the event of an un-planned H_2S release at the facility. The primary purpose of this plan is to assure a coordinated and efficient procedure to alert and protect operating personnel and the public, as well as minimize environmental hazard and property damage in the event of an un-planned release of H_2S gas.

dwhite@geolex.com

From: Santiago Flores <SFlores@Geolex.com>
Sent: Wednesday, April 28, 2021 11:07 AM
To: 'Lorenzo Velasquez'
Cc: 'dwhite@geolex.com'; 'Alberto A. Gutierrez'
Subject: RE: [External] Piñon Midstream - Gas Treating Facility

Thank you, Mr. Velasquez. We will provide your office with a complete version of the contingency plan following NMOCD approval. Additionally, your office will be contacted annually in order to provide you with updates to the plan and to make sure contact information is up to date. If at any time you have comments or concerns, please do not hesitate to reach out to us. Thanks for your time, and have a good day.

Santiago Flores - Geolex, Incorporated®
(505) 220-4613 - cell
(505) 842-8000 - office

-----Original Message-----
From: Lorenzo Velasquez <Lvelasquez@leacounty.net>
Sent: Wednesday, April 28, 2021 10:54 AM
To: Santiago Flores <SFlores@Geolex.com>
Subject: RE: [External] Piñon Midstream - Gas Treating Facility

I honestly thought I had replied to this already. Sorry for the delay. We reviewed the plan and it complies with our requirements.

-----Original Message-----
From: Santiago Flores <SFlores@Geolex.com>
Sent: Wednesday, April 28, 2021 10:37 AM
To: Lorenzo Velasquez <Lvelasquez@leacounty.net>
Cc: 'Alberto A. Gutierrez' <aag@Geolex.com>; dwhite@Geolex.com
Subject: RE: [External] Piñon Midstream - Gas Treating Facility

CAUTION: This email originated from outside of Lea County. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Greetings Mr. Velasquez,

My name is Santiago Flores with Geolex, Inc. I reached out to your office on Monday, April 26th to follow up on the Hydrogen Sulfide Contingency Plan information that was sent to you on April 7, 2021 by Mr. White with Geolex, Inc. I spoke with Alisa (I apologize if I spelled her name wrong) on the phone. She informed me that you are the person who to contact in the event that the Contingency Plan for the Dark Horse Gas Treatment Plan is activated. The number she provided, which will be added to the contingency plan, is 575-605-6561.

Please, if you have yet to, review the Contingency Plan material (included again in this email as an attachment), and let us know if you have any comments or concerns. I look forward to hearing from you, and thank you for your time.

Regards,

Santiago Flores - Geolex, Incorporated®

(505) 220-4613

From: dwhite@geolex.com <dwhite@geolex.com>
Sent: Monday, April 19, 2021 10:19 AM
To: lvelasquez@leacounty.net
Cc: 'Alberto A. Gutierrez' <aag@geolex.com>; sflores@geolex.com
Subject: RE: Piñon Midstream - Gas Treating Facility

Mr. Velasquez,

I hope you are doing well and had a wonderful weekend. I'm reaching out again regarding the planned Piñon Midstream, LLC gas-treatment facility described in my previous correspondence (included below). As previously mentioned, we (Geolex, Inc.) have been assisting Piñon in developing a Hydrogen Sulfide Contingency Plan to ensure

operations follow an efficient procedure to alert and protect operating personnel and the public, and minimize environmental hazard and property damage, in the event of an un-planned release of hydrogen sulfide (H2S).

As part of Lea County Emergency Management, we would like to assure you are provided all the information you need and have ample opportunity to discuss any concerns or questions you may have. In this correspondence, I've attached a brief summary that introduces the planned facility and generally outlines the H2S Contingency Plan. If you would like to receive a full copy of the H2S Contingency Plan draft, or would like to discuss via Zoom teleconferencing, please don't hesitate to let us know and we will work to arrange a meeting. Additionally, if there is another individual within your organization that should be contacted regarding this plan, we would appreciate if you directed us to them.

Regards,

David A. White, M.S.

(859)967-7231 Cell

From: dwhite@geolex.com <mailto:dwhite@geolex.com> <dwhite@geolex.com <mailto:dwhite@geolex.com> >
Sent: Wednesday, April 7, 2021 1:49 PM
To: 'lvelasquez@leacounty.net' <lvelasquez@leacounty.net <mailto:lvelasquez@leacounty.net> >
Cc: 'Alberto A. Gutierrez (aag@geolex.com <mailto:aag@geolex.com>)' <aag@geolex.com <mailto:aag@geolex.com> >; sflores@geolex.com <mailto:sflores@geolex.com>
Subject: Piñon Midstream - Gas Treating Facility

Good day Mr. Velasquez,

My name is David White with Geolex, Inc., and I am reaching out to you on behalf of Piñon Midstream, LLC, who is constructing a gas-treatment facility (Dark Horse Treatment Facility) approximately six (6) miles west of Jal, New Mexico. We (Geolex) have been aiding Piñon in the development of a Hydrogen Sulfide (H2S) Contingency Plan, which will direct Piñon's actions in the event of an un-planned H2S release at the facility. The primary purpose of this plan is to assure a coordinated and efficient procedure to alert and protect operating personnel and the public, as well as minimize environmental hazard and property damage in the event of an un-planned release of H2S gas.

As part of Lea County Emergency Management, we would like to provide you with pertinent details regarding the plan, as well as an opportunity to discuss any concerns or questions you may have. In the unlikely event that an un-planned release does occur, we would like state and local authorities to be aware of the actions the plant operators will take, as well as the potential involvement of any authorities. Furthermore, you or your organization will be contacted by phone should the contingency plan be activated.

Attached you will find a brief summary, which provides an introduction to the proposed Dark Horse facility and generally outlines the actions to be taken in response to an un-planned H2S release. Geolex is currently finalizing the complete H-2-S Contingency Plan and will provide a copy for your review upon completion.

We welcome any input and are available for any questions you may have. If you would prefer, a call or Zoom meeting can be set up to discuss the contingency plan in real time, or you may reach us directly at (505)842-8000. Additionally, if there is another individual within your organization that should be the primary contact regarding this plan, we would appreciate it if you directed us to them.

Thank you for your time.

Regards,

David A. White, M.S.

Geolex, Incorporated®

500 Marquette Avenue, NW Suite 1350

Albuquerque, NM 87102

(505)842-8000 Office

(859)967-7231 Cell

NEW MEXICO DEPARTMENT OF HOMELAND SECURITY AND EMERGENCY MANAGEMENT

(Electronic Mail Correspondence)

dwhite@geolex.com

From: dwhite@geolex.com
Sent: Wednesday, April 7, 2021 2:00 PM
To: 'kelly.hamilton@state.nm.us'
Cc: 'Alberto A. Gutierrez (aag@geolex.com)'; sflores@geolex.com
Subject: Piñon Midstream - Gas Treating Facility
Attachments: Pinon H2S Plan - Selected Material.pdf

Dear Kelly Hamilton,

My name is David White with Geolex, Inc., and I am reaching out to you on behalf of Piñon Midstream, LLC, who is constructing a gas-treatment facility (Dark Horse Treatment Facility) approximately six (6) miles west of Jal, New Mexico. We (Geolex) have been aiding Piñon in the development of a Hydrogen Sulfide (H_2S) Contingency Plan, which will direct Piñon's actions in the event of an un-planned H_2S release at the facility. The primary purpose of this plan is to assure a coordinated and efficient procedure to alert and protect operating personnel and the public, as well as minimize environmental hazard and property damage in the event of an un-planned release of H_2S gas.

As part of NM DHS and Emergency Management, we would like to provide you with pertinent details regarding the plan, as well as an opportunity to discuss any concerns or questions you may have. In the unlikely event that an un-planned release does occur, we would like state and local authorities to be aware of the actions the plant operators will take, as well as the potential involvement of any authorities. Furthermore, you or your organization will be contacted by phone should the contingency plan be activated.

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We welcome any input and are available for any questions you may have. If you would prefer, a call or Zoom meeting can be set up to discuss the contingency plan in real time, or you may reach us directly at (505)842-8000. Additionally, if there is another individual within your organization that should be the primary contact regarding this plan, we would appreciate it if you directed us to them.

Thank you for your time.

Regards,

David A. White, M.S.
Geolex, Incorporated®
500 Marquette Avenue, NW Suite 1350
Albuquerque, NM 87102
(505)842-8000 Office
(859)967-7231 Cell

dwhite@geolex.com

From: dwhite@geolex.com
Sent: Monday, April 19, 2021 10:23 AM
To: 'kelly.hamilton@state.nm.us'
Cc: 'Alberto A. Gutierrez (aag@geolex.com)'; sflores@geolex.com
Subject: RE: Piñon Midstream - Gas Treating Facility
Attachments: Pinon H2S Plan - Selected Material.pdf

Mr. Kelly Hamilton,

I hope you are doing well and had a wonderful weekend. I'm reaching out again regarding the planned Piñon Midstream, LLC gas-treatment facility described in my previous correspondence (included below). As previously mentioned, we (Geolex, Inc.) have been assisting Piñon in developing a Hydrogen Sulfide Contingency Plan to ensure operations follow an efficient procedure to alert and protect operating personnel and the public, and minimize environmental hazard and property damage, in the event of an un-planned release of hydrogen sulfide (H_2S).

As part of NM DHS and Emergency Management, we would like to assure you are provided all the information you need and have ample opportunity to discuss any concerns or questions you may have. In this correspondence, I've attached a brief summary that introduces the planned facility and generally outlines the H_2S Contingency Plan. If you would like to receive a full copy of the H_2S Contingency Plan draft, or would like to discuss via Zoom teleconferencing, please don't hesitate to let us know and we will work to arrange a meeting. Additionally, if there is another individual within your organization that should be contacted regarding this plan, we would appreciate if you directed us to them.

Regards,

David A. White, M.S.
(859)967-7231 Cell

From: dwhite@geolex.com <dwhite@geolex.com>
Sent: Wednesday, April 7, 2021 2:00 PM
To: 'kelly.hamilton@state.nm.us' <kelly.hamilton@state.nm.us>
Cc: 'Alberto A. Gutierrez (aag@geolex.com)' <aag@geolex.com>; sflores@geolex.com
Subject: Piñon Midstream - Gas Treating Facility

Dear Kelly Hamilton,

My name is David White with Geolex, Inc., and I am reaching out to you on behalf of Piñon Midstream, LLC, who is constructing a gas-treatment facility (Dark Horse Treatment Facility) approximately six (6) miles west of Jal, New Mexico. We (Geolex) have been aiding Piñon in the development of a Hydrogen Sulfide (H_2S) Contingency Plan, which will direct Piñon's actions in the event of an un-planned H_2S release at the facility. The primary purpose of this plan is to assure a coordinated and efficient procedure to alert and protect operating personnel and the public, as well as minimize environmental hazard and property damage in the event of an un-planned release of H_2S gas.

dwhite@geolex.com

From: Santiago Flores <SFlores@Geolex.com>
Sent: Thursday, April 29, 2021 1:13 PM
To: 'Walker, Susan, DHSEM'; 'Jolly, Julie, DHSEM'
Cc: 'Alberto A. Gutierrez'; 'dwhite@Geolex.com'; 'Operations, NMEOC, DHSEM'
Subject: RE: Piñon Midstream - Gas Treating Facility

Hi, Susan. Thank you for the response. I have reached out to Julie Jolly by phone and left her a message. I appreciate you including her on this email. We have also been in touch with Mr. Velasquez. He has informed us that the plan complies with his requirements. Once the plan is finalized by NMOCD, we will send you the complete and final copy. Additionally, Your organization will be contacted annually to provide you with any updates to the plan as well as to verify contact information. If at any time, your organization has concerns, questions, or input regarding the plan, please do not hesitate to reach out to us.

Regards,

Santiago Flores - Geolex, Incorporated
(505) 220-4613 – cell
(505) 842-8000 – office

From: Walker, Susan, DHSEM <susan.walker@state.nm.us>
Sent: Wednesday, April 28, 2021 3:17 PM
To: Santiago Flores <SFlores@Geolex.com>; Jolly, Julie, DHSEM <Julie.Jolly@state.nm.us>
Cc: 'Alberto A. Gutierrez' <aag@Geolex.com>; dwhite@Geolex.com; Operations, NMEOC, DHSEM <NMEOC.Operations@state.nm.us>
Subject: Piñon Midstream - Gas Treating Facility

Thank you for the preview – I know you are in good hands down south with Lorenzo Velasquez. Not sure if you also included Julie Jolly our Hazardous Materials Coordinator and our Agency Representative for the State Emergency Response Commission.

Respectfully,

Susan C. Walker
Response and Recovery Team

New Mexico Department of Homeland Security and Emergency Management
PO Box 27111
Santa Fe, NM 87502

Contact:

Office: 505.476.9640
Cellular: 505.690.2340
Primary Email: susan.walker@state.nm.us

Building Resilience in New Mexico

Please consider the environment before printing this email

From: Santiago Flores [mailto:SFlores@Geolex.com]
Sent: Wednesday, April 28, 2021 11:28 AM
To: Walker, Susan, DHSEM
Cc: 'Alberto A. Gutierrez'; dwhite@Geolex.com
Subject: [EXT] Piñon Midstream - Gas Treating Facility

Good day Chief Walker,

My name is Santiago Flores with Geolex, Inc., and I am reaching out to you on behalf of Piñon Midstream, LLC, who is constructing a gas-treatment facility (Dark Horse Treatment Facility) approximately six (6) miles west of Jal, New Mexico. We (Geolex) have been aiding Piñon in the development of a Hydrogen Sulfide (H_2S) Contingency Plan, which will direct Piñon's actions in the event of an un-planned H_2S release at the facility. The primary purpose of this plan is to assure a coordinated and efficient procedure to alert and protect operating personnel and the public, as well as minimize environmental hazard and property damage in the event of an un-planned release of H_2S gas.

As part of the NM Department of Homeland Security and Emergency Management Office, we would like to provide you with pertinent details regarding the plan, as well as an opportunity to discuss any concerns or questions you may have. In the unlikely event that an un-planned release does occur, we would like state and local authorities to be aware of the actions the plant operators will take, as well as the potential involvement of any authorities. Furthermore, you or your organization will be contacted by phone should the contingency plan be activated.

Attached you will find a brief summary, which provides an introduction to the proposed Dark Horse facility and generally outlines the actions to be taken in response to an un-planned H_2S release. Geolex is currently finalizing the complete H_2S Contingency Plan and will provide a copy for your review upon completion.

We welcome any input and are available for any questions you may have. If you would prefer, a call or Zoom meeting can be set up to discuss the contingency plan in real time, or you may reach us directly at (505)842-8000. Additionally, if there is another individual within your organization that should be the primary contact regarding this plan, we would appreciate it if you directed us to them.

Thank you for your time.

Regards,

Santiago Flores, M.S.
Geolex, Incorporated
500 Marquette Ave. NW Suite 1350
Albuquerque, NM 87102

(505) 842-8000 Office
(505) 220-4613 Cell

dwhite@geolex.com

From: Santiago Flores <SFlores@Geolex.com>
Sent: Tuesday, May 4, 2021 2:59 PM
To: 'Jolly, Julie, DHSEM'
Cc: 'dwhite@Geolex.com'
Subject: RE: [EXT] RE: Piñon Midstream - Gas Treating Facility
Attachments: Piñon - Dark Horse H2S Contingency Plan Draft_5-3-2021.pdf; Pinon H2S Plan - Selected Material.pdf

Good afternoon, Julie. Thank you for the discussion today. I apologize for not previously ensuring your reception of the material we covered. That material, as well as a draft of the complete plan, are included as attachments to this email. The draft is nearly complete and will be sent to Carl Chavez at NMOCD this week. Since there may be some changes required by NMOCD, we will provide you with a final copy of the plan for your records following NMOCD approval. We welcome any input you may have. Feel free to contact us at any time.

Regards,

Santiago Flores - Geolex, Incorporated•
(505) 220-4613 – Cell
(505) 842-8000 – Office

From: Jolly, Julie, DHSEM <Julie.Jolly@state.nm.us>
Sent: Monday, May 3, 2021 4:29 PM
To: Santiago Flores <SFlores@Geolex.com>
Subject: RE: [EXT] RE: Piñon Midstream - Gas Treating Facility

Ok yes 2pm is fine.

Julie

From: Santiago Flores <SFlores@Geolex.com>
Sent: Monday, May 3, 2021 4:27 PM
To: Jolly, Julie, DHSEM <Julie.Jolly@state.nm.us>
Subject: RE: [EXT] RE: Piñon Midstream - Gas Treating Facility

Would 2pm work? We can set up a conference call or a zoom call if you would like us to go over the material. It is your choice.

Santiago Flores - Geolex, Incorporated•
(505) 220-4613

From: Jolly, Julie, DHSEM <Julie.Jolly@state.nm.us>
Sent: Monday, May 3, 2021 4:05 PM
To: Santiago Flores <SFlores@Geolex.com>
Subject: RE: [EXT] RE: Piñon Midstream - Gas Treating Facility

Yes I would love the chance. I will be in the office all day tomorrow from 8 am till 4:30 PM.

Respectfully,

Julie C. Jolly
New Mexico Hazardous Materials Coordinator

New Mexico Department of Homeland Security and Emergency Management
PO Box 2711
Santa Fe, NM 87502

Contact:
Cellular: 505-469-8012
Primary Email: julie.jolly@state.nm.us

Building Resilience in New Mexico

Please consider the environment before printing this email

From: Santiago Flores <SFlores@Geolex.com>
Sent: Monday, May 3, 2021 2:59 PM
To: Jolly, Julie, DHSEM <Julie.Jolly@state.nm.us>; Walker, Susan, DHSEM <susan.walker@state.nm.us>
Cc: 'Alberto A. Gutierrez' <aag@Geolex.com>; dwhite@Geolex.com; Operations, NMEOC, DHSEM <NMEOC.Operations@state.nm.us>
Subject: RE: [EXT] RE: Piñon Midstream - Gas Treating Facility

Good afternoon, Julie. I hope your week is off to a good start. Is there anything in particular you would like to discuss regarding the H_2S Contingency Plan? We are happy to address your questions, comments, or concerns by any means. Feel free to call or email for discussion. I look forward to hearing from you.

Regards,

Santiago Flores - Geolex, Incorporated®
(505) 220-4613 – Cell
(505) 842-8000 – Office

From: Jolly, Julie, DHSEM <Julie.Jolly@state.nm.us>
Sent: Thursday, April 29, 2021 1:31 PM
To: Santiago Flores <SFlores@Geolex.com>; Walker, Susan, DHSEM <susan.walker@state.nm.us>
Cc: 'Alberto A. Gutierrez' <aag@Geolex.com>; dwhite@Geolex.com; Operations, NMEOC, DHSEM <NMEOC.Operations@state.nm.us>
Subject: RE: [EXT] RE: Piñon Midstream - Gas Treating Facility

Sorry I was on a zoom meeting and am on meetings the rest of the day. I will try to call you back in between meetings.

Respectfully,

Julie C. Jolly
New Mexico Hazardous Materials Coordinator

New Mexico Department of Homeland Security and Emergency Management
PO Box 2711
Santa Fe, NM 87502

Contact:
Cellular: 505-469-8012
Primary Email: julie.jolly@state.nm.us

Building Resilience in New Mexico

Please consider the environment before printing this email

From: Santiago Flores <SFlores@Geolex.com>
Sent: Thursday, April 29, 2021 1:13 PM
To: Walker, Susan, DHSEM <susan.walker@state.nm.us>; Jolly, Julie, DHSEM <Julie.Jolly@state.nm.us>

Cc: 'Alberto A. Gutierrez' <aag@Geolex.com>; dwhite@Geolex.com; Operations, NMEOC, DHSEM <NMEOC.Operations@state.nm.us>
Subject: [EXT] RE: Piñon Midstream - Gas Treating Facility

Hi, Susan. Thank you for the response. I have reached out to Julie Jolly by phone and left her a message. I appreciate you including her on this email. We have also been in touch with Mr. Velasquez. He has informed us that the plan complies with his requirements. Once the plan is finalized by NMOCD, we will send you the complete and final copy. Additionally, Your organization will be contacted annually to provide you with any updates to the plan as well as to verify contact information. If at any time, your organization has concerns, questions, or input regarding the plan, please do not hesitate to reach out to us.

Regards,

Santiago Flores - Geolex, Incorporated
(505) 220-4613 – cell
(505) 842-8000 – office

From: Walker, Susan, DHSEM <susan.walker@state.nm.us>
Sent: Wednesday, April 28, 2021 3:17 PM
To: Santiago Flores <SFlores@Geolex.com>; Jolly, Julie, DHSEM <Julie.Jolly@state.nm.us>
Cc: 'Alberto A. Gutierrez' <aag@Geolex.com>; dwhite@Geolex.com; Operations, NMEOC, DHSEM <NMEOC.Operations@state.nm.us>
Subject: Piñon Midstream - Gas Treating Facility

Thank you for the preview – I know you are in good hands down south with Lorenzo Velasquez. Not sure if you also included Julie Jolly our Hazardous Materials Coordinator and our Agency Representative for the State Emergency Response Commission.

Respectfully,

Susan C. Walker
Response and Recovery Team

New Mexico Department of Homeland Security and Emergency Management
PO Box 27111
Santa Fe, NM 87502

Contact:
Office: 505.476.9640
Cellular: 505.690.2340
Primary Email: susan.walker@state.nm.us

Building Resilience in New Mexico

Please consider the environment before printing this email

From: Santiago Flores [mailto:SFlores@Geolex.com]
Sent: Wednesday, April 28, 2021 11:28 AM
To: Walker, Susan, DHSEM
Cc: 'Alberto A. Gutierrez'; dwhite@Geolex.com
Subject: [EXT] Piñon Midstream - Gas Treating Facility

Good day Chief Walker,

My name is Santiago Flores with Geolex, Inc., and I am reaching out to you on behalf of Piñon Midstream, LLC, who is constructing a gas-treatment facility (Dark Horse Treatment Facility) approximately six (6) miles west of Jal, New Mexico. We (Geolex) have been aiding Piñon in the development of a Hydrogen Sulfide (H_2S) Contingency Plan, which will direct Piñon's actions in the event of an un-planned H_2S release at the facility. The primary purpose of this plan is to assure a coordinated and efficient procedure to alert and protect operating personnel and the public, as well as minimize environmental hazard and property damage in the event of an un-planned release of H_2S gas.

As part of the NM Department of Homeland Security and Emergency Management Office, we would like to provide you with pertinent details regarding the plan, as well as an opportunity to discuss any concerns or questions you may have. In the unlikely event that an un-planned release does occur, we would like state and local authorities to be aware of the actions the plant operators will take, as well as the potential involvement of any authorities. Furthermore, you or your organization will be contacted by phone should the contingency plan be activated.

Attached you will find a brief summary, which provides an introduction to the proposed Dark Horse facility and generally outlines the actions to be taken in response to an un-planned H_2S release. Geolex is currently finalizing the complete H_2S Contingency Plan and will provide a copy for your review upon completion.

We welcome any input and are available for any questions you may have. If you would prefer, a call or Zoom meeting can be set up to discuss the contingency plan in real time, or you may reach us directly at (505)842-8000. Additionally, if there is another individual within your organization that should be the primary contact regarding this plan, we would appreciate it if you directed us to them.

Thank you for your time.

Regards,

Santiago Flores, M.S.
Geolex, Incorporated
500 Marquette Ave. NW Suite 1350
Albuquerque, NM 87102
(505) 842-8000 Office
(505) 220-4613 Cell

PRIVILEGED & CONFIDENTIAL

LEA COUNTY SHERIFF'S OFFICE

(Electronic Mail Correspondence)

From: dwhite@geolex.com
To: "chelton@leacounty.net"
Cc: "Alberto A. Gutierrez (aag@geolex.com)"; sflores@geolex.com
Subject: Piñon Midstream - Gas Treating Facility
Date: Wednesday, April 7, 2021 2:04:23 PM
Attachments: Pinon H2S Plan - Selected Material.pdf

Good day Mr. Helton,

My name is David White with Geolex, Inc., and I am reaching out to you on behalf of Piñon Midstream, LLC, who is constructing a gas-treatment facility (Dark Horse Treatment Facility) approximately six (6) miles west of Jal, New Mexico. We (Geolex) have been aiding Piñon in the development of a Hydrogen Sulfide (H_2S) Contingency Plan, which will direct Piñon's actions in the event of an un-planned H_2S release at the facility. The primary purpose of this plan is to assure a coordinated and efficient procedure to alert and protect operating personnel and the public, as well as minimize environmental hazard and property damage in the event of an un-planned release of H_2S gas.

We would like to provide the Lea County Sheriff's Office with pertinent details regarding the plan, as well as an opportunity to discuss any concerns or questions you may have. In the unlikely event that an un-planned release does occur, we would like state and local authorities to be aware of the actions the plant operators will take, as well as the potential involvement of any authorities. Furthermore, you or your organization will be contacted by phone should the contingency plan be activated.

Attached you will find a brief summary, which provides an introduction to the proposed Dark Horse facility and generally outlines the actions to be taken in response to an un-planned H_2S release. Geolex is currently finalizing the complete H_2S Contingency Plan and will provide a copy for your review upon completion.

We welcome any input and are available for any questions you may have. If you would prefer, a call or Zoom meeting can be set up to discuss the contingency plan in real time, or you may reach us directly at (505)842-8000. Additionally, if there is another individual within your organization that should be the primary contact regarding this plan, we would appreciate it if you directed us to them.

Thank you for your time.

Regards,

David A. White, M.S.
Geolex, Incorporated®
500 Marquette Avenue, NW Suite 1350
Albuquerque, NM 87102
(505)842-8000 Office
(859)967-7231 Cell

From: dwhite@geolex.com
To: "chelton@leacounty.net"
Cc: "Alberto A. Gutierrez (aag@geolex.com)"; sflores@geolex.com
Subject: RE: Piñon Midstream - Gas Treating Facility
Date: Monday, April 19, 2021 10:26:11 AM
Attachments: Pinon H2S Plan - Selected Material.pdf

Good day Mr. Helton,

I hope you are doing well and had a wonderful weekend. I'm reaching out again regarding the planned Piñon Midstream, LLC gas-treatment facility described in my previous correspondence (included below). As previously mentioned, we (Geolex, Inc.) have been assisting Piñon in developing a Hydrogen Sulfide Contingency Plan to ensure operations follow an efficient procedure to alert and protect operating personnel and the public, and minimize environmental hazard and property damage, in the event of an un-planned release of hydrogen sulfide (H_2S).

As part of the Lea County Sheriff's Office, we would like to assure you are provided all the information you need and have ample opportunity to discuss any concerns or questions you may have. In this correspondence, I've attached a brief summary that introduces the planned facility and generally outlines the H_2S Contingency Plan. If you would like to receive a full copy of the H_2S Contingency Plan draft, or would like to discuss via Zoom teleconferencing, please don't hesitate to let us know and we will work to arrange a meeting. Additionally, if there is another individual within your organization that should be contacted regarding this plan, we would appreciate if you directed us to them.

Regards,

David A. White, M.S.
(859)967-7231 Cell

From: dwhite@geolex.com <dwhite@geolex.com>
Sent: Wednesday, April 7, 2021 2:04 PM
To: 'chelton@leacounty.net' <chelton@leacounty.net>
Cc: 'Alberto A. Gutierrez (aag@geolex.com)' <aag@geolex.com>; sflores@geolex.com
Subject: Piñon Midstream - Gas Treating Facility

Good day Mr. Helton,

From: Santiago Flores
To: "cbalderaz@leacounty.net"
Cc: "dwhite@geolex.com"; "Alberto A. Gutierrez"
Subject: RE: Pinon Midstream - Gas Treating Facility
Date: Friday, April 30, 2021 9:10:00 AM

Good morning Connie,

Did anyone within the Lea County Sherriff's Office have a chance to review the contingency plan details that we sent you on Monday? We are greatly interested in incorporating any input your office may have regarding the plan, and we are happy to answer any questions you have. Feel free to call or email us at any time. I look forward to hearing from you.

Regards

Santiago Flores – Geolex, Incorporated®
(505) 220-4613 – Cell
(505) 842-8000 – Office

From: Santiago Flores <SFlores@Geolex.com>
Sent: Monday, April 26, 2021 3:17 PM
To: 'cbalderaz@leacounty.net' <cbalderaz@leacounty.net>
Cc: 'dwhite@geolex.com' <dwhite@geolex.com>; 'Alberto A. Gutierrez' <aag@geolex.com>
Subject: Pinon Midstream - Gas Treating Facility

Good afternoon Connie,

Thank you for the brief discussion we had today regarding Piñon Midstream's H_2S contingency plan. Please forward this on to necessary personnel for review and comment.

My name is Santiago Flores with Geolex, Inc., and I am reaching out to you on behalf of Piñon Midstream, LLC, who is constructing a gas-treatment facility (Dark Horse Treatment Facility) approximately six (6) miles west of Jal, New Mexico. We (Geolex) have been aiding Piñon in the development of a Hydrogen Sulfide (H_2S) Contingency Plan, which will direct Piñon's actions in the event of an un-planned H_2S release at the facility. The primary purpose of this plan is to assure a coordinated and efficient procedure to alert and protect operating personnel and the public, as well

as minimize environmental hazard and property damage in the event of an un-planned release of H_2S gas.

As part of the Lea County Sherriff's Office, we would like to provide you with pertinent details regarding the plan, as well as an opportunity to discuss any concerns or questions you may have. In the unlikely event that an un-planned release does occur, we would like state and local authorities to be aware of the actions the plant operators will take, as well as the potential involvement of any authorities. Furthermore, the Lea County Sherriff's Office will be contacted by phone should the contingency plan be activated.

Attached you will find a brief summary, which provides an introduction to the proposed Dark Horse facility and generally outlines the actions to be taken in response to an un-planned H_2S release. Geolex is currently finalizing the complete H_2S Contingency Plan and will provide a copy for your review upon completion.

We welcome any input and are available for any questions you may have. If you would prefer, a call or Zoom meeting can be set up to discuss the contingency plan in real time, or you may reach us directly at (505)842-8000.

Thank you for your time.

Regards,

Santiago Flores, M.S.
Geolex, Incorporated®
500 Marquette Ave. NW Suite 1350
Albuquerque, NM 87102
(505) 842-8000 Office
(505) 220-4613 Cell

NEW MEXICO STATE POLICE
HOBBS DISTRICT OFFICE

(Electronic Mail Correspondence)

From:	dwhite@geolex.com
To:	"pedro.estrada@state.nm.us"
Cc:	"Alberto A. Gutierrez (aag@geolex.com)"; sflores@geolex.com
Subject:	Piñon Midstream - Gas Treating Facility
Date:	Monday, April 19, 2021 10:35:08 AM
Attachments:	Pinon H2S Plan - Selected Material.pdf

Good day Mr. Estrada,

My name is David White with Geolex, Inc., and I am reaching out to you on behalf of Piñon Midstream, LLC, who is constructing a gas-treatment facility (Dark Horse Treatment Facility) approximately six (6) miles west of Jal, New Mexico. We (Geolex) have been aiding Piñon in the development of a Hydrogen Sulfide (H_2S) Contingency Plan, which will direct Piñon's actions in the event of an un-planned H_2S release at the facility. The primary purpose of this plan is to assure a coordinated and efficient procedure to alert and protect operating personnel and the public, as well as minimize environmental hazard and property damage in the event of an un-planned release of H_2S gas.

We would like to provide the New Mexico State Police with pertinent details they require regarding the plan, as well as an opportunity to discuss any concerns or questions you may have. In the unlikely event that an un-planned release does occur, we would like state and local authorities to be aware of the actions the plant operators will take, as well as the potential involvement of any authorities. Furthermore, you or your organization will be contacted by phone should the contingency plan be activated.

Attached you will find a brief summary, which provides an introduction to the proposed Dark Horse facility and generally outlines the actions to be taken in response to an un-planned H_2S release. Geolex is currently finalizing the complete H_2S Contingency Plan and can provide a copy for your review, if preferred.

We welcome any input and are available for any questions you may have. If you would prefer, a call or Zoom meeting can be set up to discuss the contingency plan in real time, or you may reach us directly at (505)842-8000. Additionally, if there is another individual within your organization that should be the primary contact regarding this plan, we would appreciate it if you directed us to them.

Thank you for your time.

Regards,

David A. White, M.S.
Geolex, Incorporated®
500 Marquette Avenue, NW Suite 1350
Albuquerque, NM 87102
(505)842-8000 Office
(859)967-7231 Cell

BUSINESSES WITHIN POTENTIALLY-IMPACTED AREA

(Electronic Mail Correspondence)

From: Santiago Flores
To: "bluestarservices88252@outlook.com"
Cc: "DAVID WHITE"
Subject: Piñon Midstream - Gas Treating Facility
Date: Friday, May 7, 2021 1:37:00 PM
Attachments: Pinon H2S Plan - Selected Material.pdf

Greetings Mr. Smith,

My name is Santiago Flores with Geolex, Inc. We spoke initially on the week of March 15th regarding the H_2S Contingency Plan for a gas treatment plan near Jal. In our previous conversation, we discussed the procedures the plant operators will take to contact you in the event of an emergency at the plant that requires you to take action. I have attached additional information regarding the plant and the plan to this email for your review. A full version of the H_2S Contingency Plan will be reviewed by NMOCD very soon, and, upon their approval, the full version will be sent to you for your records. If you have any questions or concerns, please feel free to reach out to me. Currently, your phone number is included in the plan, and I have a note for the operators to request that you relay information to personnel that may be in the yard for H&S Rentals. I hope you enjoy your weekend.

Regards,

Santiago Flores, M.S.
Geolex, Incorporated®
500 Marquette Ave. NW Suite 1350
Albuquerque, NM 87102
(505) 842-8000 Office
(505) 220-4613 Cell

From: Santiago Flores
To: "haden@hsrentals.com"
Cc: "DAVID WHITE"
Subject: Piñon Midstream - Gas Treating Facility
Date: Friday, May 7, 2021 1:33:00 PM
Attachments: Pinon H2S Plan - Selected Material.pdf

Greeting Mr. Burchard,

My name is Santiago Flores with Geolex, Inc. We spoke previously on the week of March 15th regarding the H_2S Contingency Plan for a gas treatment plan near Jal. In our previous conversation we discussed the procedures the plant operators will take to contact you in the event of an emergency at the plant that requires you to take action. I have attached additional information regarding the plant and the plan to this email for your review. A full version of the H_2S Contingency Plan will be reviewed by NMOCD very soon, and, upon their approval, the full version will be sent to you for your records. If you have any questions or concerns, please feel free to reach out to me. Currently, your phone number is included in the plan, but I have a note for the operator to call Blue Star Services, LLC first to relay the message to you. I hope you enjoy your weekend.

Regards,

Santiago Flores, M.S.
Geolex, Incorporated®
500 Marquette Ave. NW Suite 1350
Albuquerque, NM 87102
(505) 842-8000 Office
(505) 220-4613 Cell

From: sflores
To: hse@thomasoilfieldservices.com
Cc: dwhite@geolex.com
Subject: Pinon Midstream - Gas Treatment Plant
Date: Friday, May 7, 2021 8:11:18 PM
Attachments: Pinon H2S Plan - Selected Material.pdf

Greetings Mr. Guillotte,

My name is Santiago Flores with Geolex, Inc. We spoke previously on the week of March 15th regarding the H2S Contingency Plan for a gas treatment plan near Jal. In our previous conversation, we discussed the procedures the plant operators will take to contact you in the event of an emergency at the plant that requires you to take action as you may have employees at the equipment yard near the facility. I have attached additional information regarding the plant and the plan to this email for your review. A full version of the H2S Contingency Plan will be reviewed by NMOCD very soon, and, upon their approval, the full version will be sent to you for your records. If you have any questions or concerns, please feel free to reach out to me. I hope you enjoy your weekend.

Regards,

Santiago Flores, M.S.
Geolex, Incorporated®
500 Marquette Ave. NW Suite 1350
Albuquerque, NM 87102
(505) 842-8000 Office
(505) 220-4613 Cell

RESIDENTIAL PROPERTY OWNER WITHIN POTENTIALLY-IMPACTED AREA

(Electronic Mail Correspondence)

dwhite@geolex.com

From: Santiago Flores <SFlores@Geolex.com>
Sent: Friday, April 23, 2021 3:27 PM
To: 'jtdinwiddie@gmail.com'
Cc: 'dwhite@geolex.com'; 'Alberto A. Gutierrez'
Subject: Pinon Midstream - Gas Treating Facility
Attachments: Pinon H2S Plan - Selected Material.pdf

Good day Mr. Dinwiddie,

My name is Santiago Flores with Geolex, Inc., and, as I mentioned via phone/text, I am reaching out to you on behalf of Piñon Midstream, LLC, who is constructing a gas-treatment facility (Dark Horse Treatment Facility) approximately six (6) miles west of Jal, New Mexico. We (Geolex) have been aiding Piñon in the development of a Hydrogen Sulfide (H_2S) Contingency Plan, which will direct Piñon's actions in the event of an un-planned H_2S release at the facility. The primary purpose of this plan is to assure a coordinated and efficient procedure to alert and protect operating personnel and the public, as well as minimize environmental hazard and property damage in the event of an un-planned release of H_2S gas.

As a residential property owner in the vicinity, we would like to provide you with pertinent details regarding the plan, as well as an opportunity to discuss any concerns or questions you may have. In the unlikely event that an un-planned release does occur, we would like nearby residences as well as state and local authorities to be aware of the actions the plant operators will take, as well as the potential involvement of any authorities. Furthermore, you and your tenant will be contacted by phone should the contingency plan be activated.

Attached you will find a brief summary, which provides an introduction to the proposed Dark Horse facility and generally outlines the actions to be taken in response to an un-planned H_2S release. Geolex is currently finalizing the complete H_2S Contingency Plan and will provide you a copy for your records following approval by NMOCD.

We welcome any input and are available for any questions you may have. If you would prefer, a call or Zoom meeting can be set up to discuss the contingency plan in real time, or you may reach us directly at (505)842-8000.

Additionally, I did have a brief discussion with Mr. Ramirez. He mentioned that he does not speak English and does not have an email address. Is future communication with Mr. Ramirez best handled through you?

I appreciate your time.

Regards,
Santiago Flores, M.S.
Geolex, Incorporated®
500 Marquette Ave. NW Suite 1350
Albuquerque, NM 87102
(505) 842-8000 Office
(505) 220-4613 Cell