

From: [Chavez, Carl J, EMNRD](#)
To: dwhite@geolex.com
Cc: [Goetze, Phillip, EMNRD](#)
Subject: Salt Creek Midstream - H2S-65 Contingency Plan Temporary Suspension
Date: Wednesday, November 10, 2021 9:10:00 AM
Attachments: [11_10_2021 SCM Suspension Request \(H2S Plan\).pdf](#)

Mr. White,

Re.: 19.15.11.15 NMAC (Exemption) [H2S-65](#)

Good morning!

The New Mexico Oil Conservation Division (OCD) is in receipt of the above subject request with attached letter of Nov. 10, 2021.

OCD will respond soon.

Thank you.

Carl J. Chavez • UIC Group
Engineering Bureau
EMNRD - Oil Conservation Division
5200 Oakland Avenue, N.E. Suite 100 | Albuquerque, NM 87113
505.660.7923
www.emnrd.nm.gov



From: dwhite@geolex.com <dwhite@geolex.com>
Sent: Wednesday, November 10, 2021 8:57 AM
To: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>
Subject: [EXTERNAL] Salt Creek Midstream - H2S Contingency Plan Temporary Suspension

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Good morning Mr. Chavez,

Thank you for taking the time to speak with me last week and providing guidance regarding the Salt Creek Midstream – Ameredev North and South Facility H₂S Contingency Plan. Attached you will find our request to temporarily suspend the H₂S plan, as the Ameredev South Facility has been taken out of service, purged of sour gas, and isolated from pipeline connection, and the Ameredev North Facility referenced in the plan has not been constructed. As such, there is currently no present potential for H₂S-containing materials to be released from any of the sites included and described in the contingency plan. Please feel free to reach out any time if you have questions regarding the

request or need any additional information. I hope you have a wonderful day.

Regards,

David A. White, M.S.

Geolex, Incorporated®

500 Marquette Avenue NW, Suite 1350

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(505)842-8000 Office

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November 10, 2021

VIA ELECTRONIC MAIL

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

RE: REQUEST FOR TEMPORARY SUSPENSION OF THE SALT CREEK MIDSTREAM,
AMEREDEV NORTH AND SOUTH FACILITY HYDROGEN SULFIDE CONTINGENCY PLAN

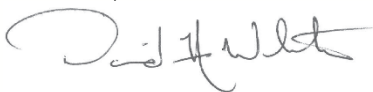
Dear Mr. Chavez,

On behalf of Salt Creek Midstream, LLC (Salt Creek), Geolex, Inc.[®] (Geolex) is hereby requesting an exemption, pursuant to 19.15.11.15 NMAC, to temporarily suspend associated reporting, training, and mock activation (drill) responsibilities of the Hydrogen Sulfide (H₂S) Contingency Plan associated with Salt Creek's Ameredev South Plant and Ameredev North Plant. To date, the only constructed and operating facility has been the Ameredev South Plant, which was taken out of service the week of February 24, 2020. The Ameredev North Facility described in the plan has not been constructed. At present, Salt Creek's internal planning for future sour gas service at this facility is ongoing, however, the facility is anticipated to remain out of service for the foreseeable future. As this facility is not operational, it has been physically isolated from pipeline connection, has been purged of remnant sour gas, and has been padded with a nitrogen blanket for the period in which it is to be out of service. For these reasons, there is currently no present potential for H₂S-containing materials to be released from the site. To prevent potential hardship to Salt Creek during this period of inactivity, we are requesting a temporary suspension of the reporting, training, and mock plan activation (drill) responsibilities of the H₂S plan.

Prior to any resumption of sour-gas processing operations at the Ameredev South Facility, Salt Creek will consult and coordinate with New Mexico Oil Conservation Division (NMOCD) technical staff to pursue re-instatement of the Hydrogen Sulfide Contingency Plan. During this coordination, the plan will be re-assessed to confirm adequacy, based on the anticipated facility operating conditions, and any necessary revisions to the response plan will be completed. Additionally, all identified potentially impacted parties (including new parties identified at the time of plan revision), local officials, and agencies will be notified of Salt Creek's intent to resume sour-gas operations at the facility. If applicable, all interested parties will be provided with a revised version of the Contingency Plan that incorporates necessary modifications identified and implemented by NMOCD and Salt Creek personnel.

If you have any questions concerning this request, or wish to discuss further, please do not hesitate to contact Alberto A. Gutiérrez, C.P.G., or David A. White at (505) 842-8000 at Geolex, Inc.[®]; 500 Marquette Avenue NW; Suite 1350; Albuquerque, NM 87102.

Sincerely,
Geolex, Inc.[®]



David A. White
Consultant to Salt Creek Midstream

P:\21-029 SCM - H2S suspend\Draft Letter to NMOCD (C. Chavez)\11_8_2021 SCM Suspension Request (H2S Plan).docx