From:
 Yu, Olivia, EMNRD

 To:
 "Slade, Rose"

 Cc:
 Naranjo, Mark

Subject: RE: ETC"s Jal #3 Gas Plant - Field Scrubber Dump Tanks (BGTs)

**Date:** Friday, February 9, 2018 9:45:00 AM

Ms. Slade:

Not a problem. The correspondent for NMSLO in the interim is Mark Naranjo.

Thanks, Olivia

**From:** Slade, Rose [mailto:Rose.Slade@energytransfer.com]

Sent: Friday, February 9, 2018 8:00 AM

To: Yu, Olivia, EMNRD < Olivia. Yu@state.nm.us>

**Subject:** RE: ETC's Jal #3 Gas Plant - Field Scrubber Dump Tanks (BGTs)

Good day Ms. Yu,

I apologize for the typo on the C-144. Please find attached the Final C-144 for the Jal 3 South Field Scrubber and the NMSLO approval email for closure of 1RP#4408. There were no request given to ETC for reclamation or re-vegetation of this site from the NMSLO in the email attached but, I will notify them immediately to identify what seed mixture and time frame in which the NMSLO would like for ETC to conduct the reclamation of the area affected. This was an oversight on my part, I was confused as to whom was the landowner of this section, I know we had some back and forth emails as to who owned that section of property. I will contact NMSLO and get the re-seeding scheduled.

Thank you, Rose Slade

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]

Sent: Thursday, February 8, 2018 12:51 PM

**To:** Slade, Rose < <a href="mailto:Rose.Slade@energytransfer.com">Rose < <a href="mailto:Rose.Slade@energytransfer.com">Rose.Slade@energytransfer.com</a>>

**Subject:** RE: ETC's Jal #3 Gas Plant - Field Scrubber Dump Tanks (BGTs)

Ms. Slade:

A typo, but an important technicality, please submit a final C-144 for the South field scrubber dump tank. The ones, included at the back of the approved closure report for 1RP-4408 and the 2 field scrubbers, are both final C-144s for the North BGT.

Also, was approval requested and given for reclamation and revegetation of this location by NMSLO? These BGTs (and 1RP-4408) are on State surface. NMSLO approved for closure of 1RP-4408, but no indication of reclamation or revegetation requirements.

Thanks, Olivia

**From:** Slade, Rose [mailto:Rose.Slade@energytransfer.com]

Sent: Tuesday, January 2, 2018 12:02 PM

To: Yu, Olivia, EMNRD < Olivia. Yu@state.nm.us>

**Subject:** RE: ETC's Jal #3 Gas Plant - Field Scrubber Dump Tanks (BGTs)

Thank you Ms. Yu.

Rose

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]

Sent: Tuesday, January 2, 2018 11:14 AM

**To:** Slade, Rose < Rose. Slade@energytransfer.com >; Lowry, Joel < <u>JLowry@trcsolutions.com</u> >; Billings,

Bradford, EMNRD < <a href="mailto:Bradford.Billings@state.nm.us">Bradford.Billings@state.nm.us</a>>

**Subject:** RE: ETC's Jal #3 Gas Plant - Field Scrubber Dump Tanks (BGTs)

Good morning Ms. Slade:

Happy new year to you, too. Submission of an initial C-144 will not be necessary. I will process the final C-144 and issue a corresponding identifier.

Thanks, Olivia

**From:** Slade, Rose [mailto:Rose.Slade@energytransfer.com]

Sent: Tuesday, January 2, 2018 8:41 AM

**To:** Yu, Olivia, EMNRD < Olivia. Yu@state.nm.us>; Lowry, Joel < JLowry@trcsolutions.com>; Billings,

Bradford, EMNRD < Bradford.Billings@state.nm.us>

**Subject:** RE: ETC's Jal #3 Gas Plant - Field Scrubber Dump Tanks (BGTs)

Good morning Ms. Yu,

I do not believe that an initial C-144 was submitted. This was one of many historical projects that we have been working on for the past several years, and what I have seen with these historical projects that the initial C-144's were either submitted and not scanned in or not submitted at all. Would you like for me to submit an initial C-144 for this project, or can we use the final as the initial/final C-144? I do apologize for that not being submitted by our previous owners.

Hope you have a great day & Happy New Year!

Respectfully,

## Rose Slade





## Rose L. Slade

Senior Environmental Specialist, Waste, Water, Remediation Energy Transfer Partners

**O:** 210.403.6525 **C:** 432.940.5147

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]

**Sent:** Friday, December 29, 2017 12:11 PM

**To:** Lowry, Joel < <u>JLowry@trcsolutions.com</u>>; Billings, Bradford, EMNRD

<<u>Bradford.Billings@state.nm.us</u>>

**Cc:** Slade, Rose < <u>Rose.Slade@energytransfer.com</u>>

**Subject:** RE: ETC's Jal #3 Gas Plant - Field Scrubber Dump Tanks (BGTs)

Ms. Slade:

Pardon me. I see that the final C-144 was submitted as the last several pages of the closure report. Do you know if an identifier for the original C-144 was provided?

Thanks, Olivia

From: Yu, Olivia, EMNRD

Sent: Friday, December 29, 2017 8:39 AM

**To:** 'Lowry, Joel' < <u>JLowry@trcsolutions.com</u>>; Billings, Bradford, EMNRD

<<u>Bradford.Billings@state.nm.us</u>>

**Cc:** 'Slade, Rose' < <u>Rose.Slade@energytransfer.com</u>>

**Subject:** RE: ETC's Jal #3 Gas Plant - Field Scrubber Dump Tanks (BGTs)

Ms. Slade:

Also, to complete the closure for the Jal #3 Field Scrubber Dump Tanks, please submit a final C-144 form. Resubmittal of the closure report is not necessary. I will append the approval.

Thanks, Olivia

From: Yu, Olivia, EMNRD

Sent: Friday, December 29, 2017 8:29 AM

**To:** 'Lowry, Joel' < <u>JLowry@trcsolutions.com</u>>; Billings, Bradford, EMNRD

<<u>Bradford.Billings@state.nm.us</u>>

**Cc:** Slade, Rose < <u>Rose.Slade@energytransfer.com</u>>; Amber Groves (<u>agroves@SLO.state.nm.us</u>)

<agroves@SLO.state.nm.us>

**Subject:** RE: ETC's Jal #3 Gas Plant - Field Scrubber Dump Tanks (BGTs) & 1RP-4408 - Remediation

Summary and Closure Request

Mr. Lowry:

The available information indicates **OPERATOR** has met the requirements of 19.15.17 NMAC and no further corrective action is required. NMOCD considers Jal #3 - Field Scrubber Dump Tanks closed.

The available information indicates **OPERATOR** has met the requirements of 19.15.29 NMAC and no further corrective action is required. NMOCD considers **1RP-4408** closed.

This determination by the Oil Conservation Division does not relieve Operator of responsibility should future information indicate a threat to ground water, surface water, human health, or the environment. Furthermore, it does not relieve Operator of responsibility for compliance with any federal, state, or local laws and/or regulations.

Like approval from NMSLO required for 1RP-4408.

Thanks,

Olivia Yu Environmental Specialist NMOCD, District I Olivia.yu@state.nm.us 575-393-6161 x113

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

**From:** Lowry, Joel [mailto:JLowry@trcsolutions.com]

**Sent:** Tuesday, December 12, 2017 10:04 AM

**To:** Yu, Olivia, EMNRD < <u>Olivia.Yu@state.nm.us</u>>; Billings, Bradford, EMNRD

<<u>Bradford.Billings@state.nm.us</u>>

**Cc:** Slade, Rose < <u>Rose.Slade@energytransfer.com</u>>

Subject: ETC's Jal #3 Gas Plant - Field Scrubber Dump Tanks (BGTs) & 1RP-4408 - Remediation

Summary and Closure Request

Please find attached the *Remediation Summary and Closure Request* and Final C-141 that has been prepared for the Jal #3 - Field Scrubber Dump Tanks and an associate release (1RP-4408). The site is located in Unit Letter "I", Section 32, Township 24 South, Range 37 East in Lea County, NM. If you have any questions or need any additional information, please feel free to contact Rose Slade or myself by phone or email. Thanks.

Respectfully,

## **Joel Lowry**

Senior Project Manager



2057 Commerce Drive, Midland, TX 79703 T: 432-520-7720 | F: 432-520-7701 | C: 432-466-4450

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