

From: [Gant, Michael](#)
To: [Stone, Joel, EMNRD](#)
Subject: RE: [EXTERNAL] Targa Roadrunner Groundwater Discharge Permit app - Closure revision
Date: Thursday, March 27, 2025 3:30:47 PM
Attachments: [image001.png](#)

Yes, I'll upload these through the portal.

Thanks,

Michael Gant

Senior ESH Specialist



TARGA

Targa Resources

3100 McKinnon St. #800 Dallas, TX 75201

+1 (314) 330 7876 Cell

mgant@targaresources.com

<https://www.targaresources.com/>

From: Stone, Joel, EMNRD <Joel.Stone@emnrd.nm.gov>
Sent: Thursday, March 27, 2025 4:27 PM
To: Gant, Michael <mgant@targaresources.com>
Subject: RE: [EXTERNAL] Targa Roadrunner Groundwater Discharge Permit app - Closure revision

Thank you, Michael. If you could go ahead and upload both of these documents to OCD permitting that would be great.

Joel B. Stone • Environmental Scientist & Specialist
Energy, Minerals and Natural Resources Department
Oil Conservation Division
1220 S. St. Francis Drive, Santa Fe, NM 87505
(505) 709-5149 | joel.stone@emnrd.nm.gov

From: Gant, Michael <mgant@targaresources.com>
Sent: Thursday, March 27, 2025 3:21 PM
To: Stone, Joel, EMNRD <Joel.Stone@emnrd.nm.gov>
Subject: [EXTERNAL] Targa Roadrunner Groundwater Discharge Permit app - Closure revision

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

Good Afternoon Joel,

Christina explained that OCD would accept the section 10 closure revisions for the Roadrunner application via email. Attached are the revised section 10 closure procedures and associated costs for the Roadrunner gas plant Groundwater Discharge Permit application. We've made revisions to the bullet list items to indicate equipment and materials that would

be sold, which has adjusted the total closure costs.

The surety bond request process will take approximately 2-3 days to complete on our end and we will plan to initiate this bond as soon as we receive OCD approval of these revisions. Please let me know if have any questions or if you'd like either of these documents submitted through the OCD portal.

Thanks,

Michael Gant

Senior ESH Specialist



TARGA

Targa Resources

3100 McKinnon St. #800 Dallas, TX 75201

+1 (314) 330 7876 Cell

mgant@targaresources.com

<https://www.targaresources.com/>

10.0 FACILITY CLOSURE/POST CLOSURE PLAN

Since this discharge permit is for unintended discharges, a closure and post-closure plan must include the entire Facility. Since the Facility is on land owned by Targa and the closed loop infrastructure is well maintained with secondary containment, any historical releases are likely to be minimal. The following general procedures will apply to prevent impacts to groundwater upon cessation of Facility operations:

- Targa will isolate, purge, and flush all fluids from process equipment, lines, pipes, vessels, and storage tanks. If applicable, equipment will also be locked out/tagged out prior to closure. Liquids and sludges will be disposed of off-site as described above in Section 4.2.
- Liquids that are not oil-based will be segregated. Any unused chemicals will be identified and profiled, then handled and disposed of using a third-party waste handler licensed and certified to handle hazardous and non-hazardous waste.
- All equipment will be isolated and locked out. At the property owner's discretion, aboveground tanks, storage vessels, process equipment, and piping will remain in place, be dismantled and recycled or sold, or transferred for use at another facility.
- Belowground piping will be cut at 3 feet bgs, capped on both ends, and buried in place.
- Any solid waste, such as building materials, concrete, containment metal, liner, and miscellaneous metal or lumber will be sold, recycled, or disposed offsite as solid waste.
- Any releases that were deferred under 19.15.29 NMAC will be addressed under the requirements of Part 29.
- Targa will collect soil samples from approximate locations nearest operational areas identified in Figure 3. Proposed sample locations will be grid based and focused on Facility operations and designed to identify any residual impacted soil.
 - Soil samples will be collected from the ground surface and field screened for volatile organic compounds (VOCs) utilizing a calibrated photoionization detector (PID) and chloride using Hach® chloride QuanTab® test strips. If field screening indicates the samples exceed 100 milligrams/kilogram total petroleum hydrocarbons (TPH) or 600 mg/kg chloride, a hand auger, direct push technology, or other equivalent methods may be used to advance a borehole in that location. Samples will be collected every foot until field screening indicates residual impacts are absent.
 - All soil samples will be placed directly into pre-cleaned glass jars, labeled with the location, date, time, sampler name, method of analysis, and immediately placed on ice. The soil samples were transported at or below 4 degrees Celsius (°C) under strict chain-of-custody procedures to a certified laboratory for analysis of the following chemicals of concern (COCs): BTEX following United States Environmental Protection Agency (EPA) Method 8021B; TPH-GRO, TPH-DRO, and TPH-motor oil range organics (MRO) following EPA Method 8015M/D; and chloride following EPA Method 300.0.
 - Laboratory analytical results will be compared to the requirements of 19.15.29 NMAC and reported, addressed, and closed according to those regulations.

- Following any remediation of impacted soil, Targa will restore the Facility footprint to match surrounding contours.
- For the purposes of the closure and post-closure cost estimate (Section 11.0), Targa has included estimated costs for revegetation including reseeding with native seed blend, monitoring, and maintenance for two successive growing seasons. Targa proposes to evaluate the necessity for revegetation with NMOCD and the private landowner based on conditions at the time of closure to develop an appropriate site-specific reclamation and revegetation plan, that prevents the exceedance of standards for groundwater listed in 20.6.2.3103 NMAC.
- Targa will submit a Closure Report detailing closure actions, sampling results, and, if necessary, any ongoing maintenance or monitoring of groundwater wells, such as annual reporting.

COSTS TO CLOSURE Roadrunner Gas Plant Targa Resources Partners LP Eddy County, New Mexico	
TASK	ESTIMATED COST
Task 1: Roadrunner Gas Plant 1 Shutdown	
Purge and Flush	\$850,000.00
Waste Disposal	\$200,000.00
Isolate / Lockout	\$50,000.00
Disassemble, remove, all site structures and equipment)	\$5,250,000.00
Waste transport, disposal, and recycling	\$1,250,000.00
Credit for resale value of equipment and materials ⁽¹⁾	-\$5,500,000.00
Subtotal	\$2,100,000.00
Task 2: Roadrunner Gas Plant 2 Shutdown	
Purge and Flush	\$850,000.00
Waste Disposal	\$200,000.00
Isolate / Lockout	\$50,000.00
Disassemble, remove, all site structures and equipment)	\$5,250,000.00
Waste transport, disposal, and recycling	\$1,250,000.00
Credit for resale value of equipment and materials ⁽¹⁾	-\$5,500,000.00
Subtotal	\$2,100,000.00
Task 3: Soil Investigation and Remediation	
Soil Sampling	\$9,200.00
Remediation (assume 1,000 yards)	\$100,800.00
Subtotal	\$110,000.00
Task 4: Reclamation	
Restoration and reseedling (appx 38 acres)	\$342,000.00
Revegetation monitoring (2 years) & Closure	\$18,475.00
Reclamation BMPs (contingency)	\$25,000.00
Subtotal	\$385,475.00
Total	\$4,695,475.00

(1) Credit for resale and relocation of equipment and materials follows standard industry practice and is based on Targa engineering and construction experience.

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 447131

CONDITIONS

Operator: Targa Northern Delaware, LLC. 110 W. 7th Street, Suite 2300 Tulsa, OK 74119	OGRID: 331548
	Action Number: 447131
	Action Type: [UF-DP] Discharge Permit (DISCHARGE PERMIT)

CONDITIONS

Created By	Condition	Condition Date
joel.stone	Revised financial assurance closure/post-closure cost estimate for the Roadrunner Gas Plant discharge permit application. DP application had previously been deemed administratively complete.	3/31/2025