

via NMOCD Permitting Online

June 25th, 2025

RE: Jal #3 Skid Fire

Calculations or Specific Volume Justification/Incident Description

Unit C-201

Incident ID nAPP2517130519

To Whom It May Concern,

ET Gathering & Processing, LLC (Energy Transfer) is hereby justifying the volume estimations done for incident nAPP2517130519 at the Jal #3 Gas Processing Plant.

A small coolant leak caused a fire on compressor unit C-201. The fire was extinguished immediately with a fire extinguisher and remained fully contained within the compressor skid.

The volume of coolant involved was estimated to be less than one gallon, and no pooled liquid was observed beneath the unit during or after the incident.

Should you have any questions or require additional information, please do not hesitate to contact me at samantha.figueroa@energytransfer.com or (432) 385-4194.

Respectfully,

Samantha Figueroa

Environmental Specialist



via Email

July 8th, 2025

RE: **Jal 3 Compressor Coolant Fire**

Variance Request

Unit C-201

Incident ID nAPP2517428921

To Whom It May Concern,

ET Gathering & Processing, LLC (ET G&P) is hereby requesting a variance for remediation, reclamation, revegetation and soil sampling for incident #nAPP2517428921 at the Jal 3 Gas Processing Plant.

The fire occurred on the compressor, which sits on a metal skid. This station has a dehydration unit, so this unit processes relatively dry gas. The unit was operating as usual before the fire started. One of our plant operators was responding to a DCS alarm when he happened to witness a small coolant leak ignite nearby. He was able to obtain a fire extinguisher and get it put out in its incipient stage in less than a minute.

The fire was completely contained to the compressor skid, and no liquids were involved. Therefore, we would like to request a variance for all aspects of soil remediation, reclamation, revegetation, and soil sampling. Soil sampling variance is requested because there is no soil under the location of the fire, only equipment, as the fire was on the compressor itself, which sits on a large steel skid.

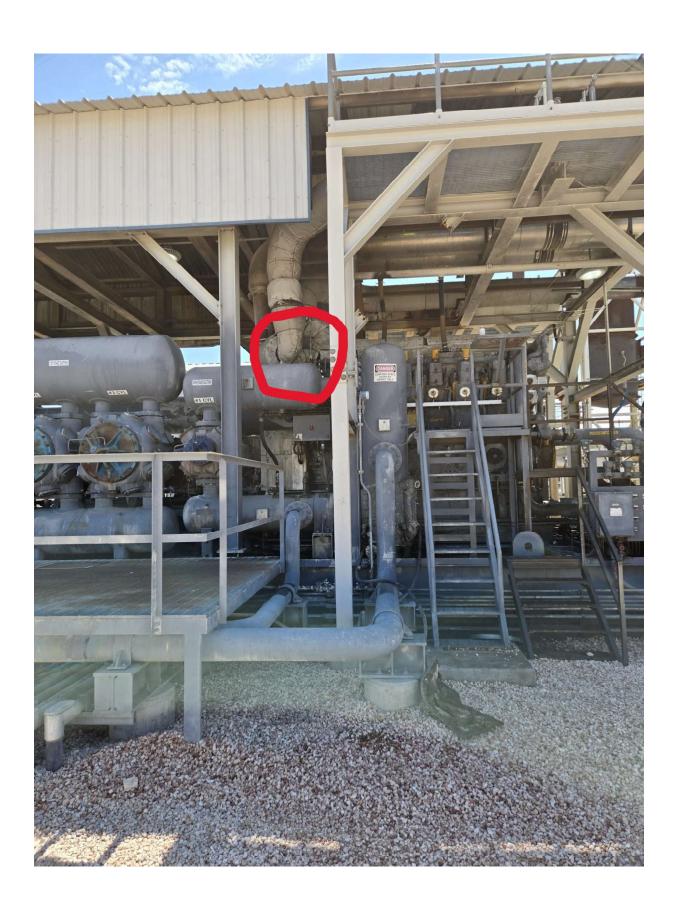
Attached are pictures of the Unit C-201 with the location of the fire highlighted in each one. The final picture is a close-up showing the minimal damage caused by the fire.

Should you have any questions or require additional information, please do not hesitate to contact me at samantha.figueroa@energytransfer.com or (432) 385-4194.

Respectfully,

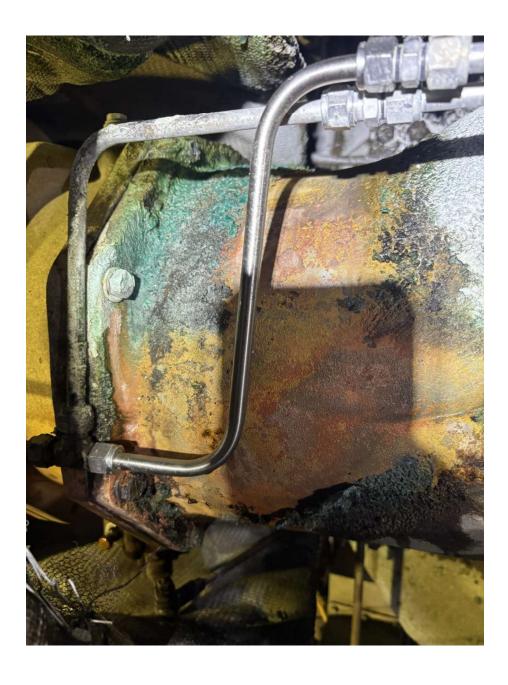
Samantha Figueroa

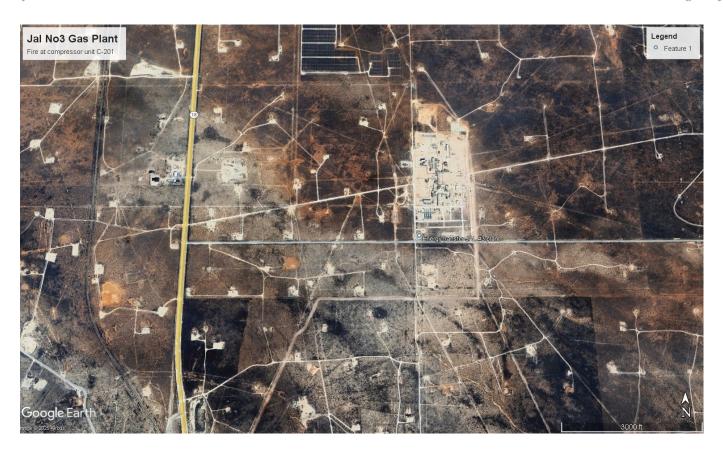
Environmental Specialist





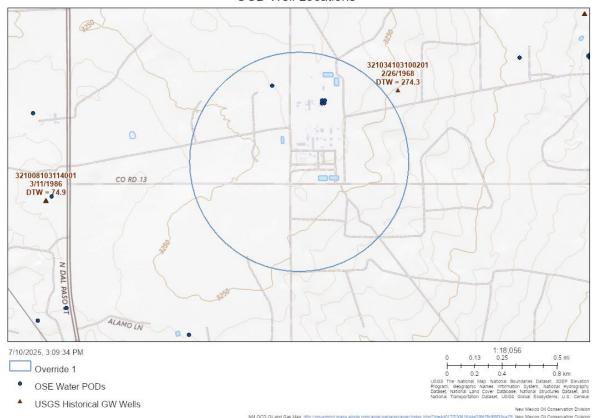






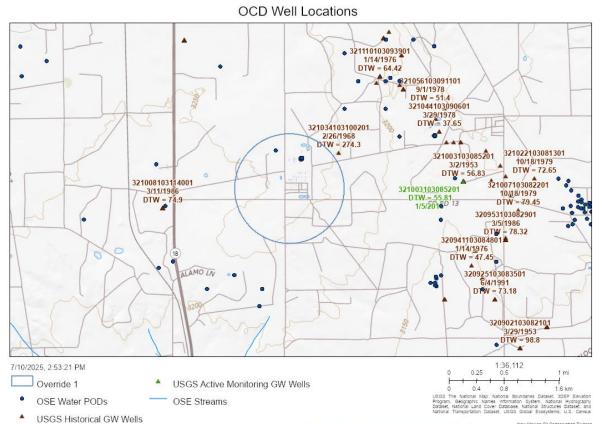


OCD Well Locations



Released to Imaging: 7/31/2025 11:31:29 AM

OCD Well Locations



New Mexico Oil Conservation Division i: New Mexico Oil Conservation Division

From:Wells, Shelly, EMNRDTo:Figueroa, Samantha

Subject: RE: [EXTERNAL] FW: The Oil Conservation Division (OCD) has rejected the application, Application ID: 478936

Date: Tuesday, July 8, 2025 4:46:06 PM

Attachments: image002.png

image003.png image004.png image005.png image006.png image007.png

Hi Samantha,

As I can see from the photographic documentation that the area that caught fire was on top of a metal skid and no liquids were released to ground surface, the variance request is approved for NAPP2517130519 JAL #3 GAS PLANT. Please include a copy of this variance request letter, the response, and all notifications in the closure report to ensure the notifications are documented in the project file.

Kind regards,

Shelly

Shelly Wells * Environmental Specialist-Advanced

Environmental Bureau

EMNRD-Oil Conservation Division

1220 S. St. Francis Drive|Santa Fe, NM 87505

(505)469-7520 Shelly.Wells@emnrd.nm.gov

http://www.emnrd.state.nm.us/OCD/

From: Figueroa, Samantha <samantha.figueroa@energytransfer.com>

Sent: Tuesday, July 8, 2025 2:08 PM

To: Wells, Shelly, EMNRD <Shelly.Wells@emnrd.nm.gov>

Subject: RE: [EXTERNAL] FW: The Oil Conservation Division (OCD) has rejected the application,

Application ID: 478936

Good afternoon Ms. Wells,

I'm attaching the variance request letter for your approval. I apologize for the delay.

Thanks,

Samantha Figueroa

Associate Specialist, Environmental

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

QUESTIONS

Action 490475

QUESTIONS

Operator:	OGRID:
ET Gathering & Processing, LLC	371183
8111 Westchester Drive	Action Number:
Dallas, TX 75225	490475
	Action Type:
	[C-141] Revegetation Report C-141 (C-141-v-Revegetation)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2517130519
Incident Name	NAPP2517130519 JAL #3 GAS PLANT @ 0
Incident Type	Fire
Incident Status	Re-vegetation Report Received

Location of Release Source	
Please answer all the questions in this group.	
Site Name	Jal #3 Gas Plant
Date Release Discovered	06/20/2025
Surface Owner	Private

Incident Details	
Please answer all the questions in this group.	
Incident Type	Fire
Did this release result in a fire or is the result of a fire	Yes
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

Nature and Volume of Release		
Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.		
Crude Oil Released (bbls) Details	Not answered.	
Produced Water Released (bbls) Details	Not answered.	
Is the concentration of chloride in the produced water >10,000 mg/l	No	
Condensate Released (bbls) Details	Not answered.	
Natural Gas Vented (Mcf) Details	Not answered.	
Natural Gas Flared (Mcf) Details	Not answered.	
Other Released Details	Cause: Corrosion Gas Compressor Station Other (Specify) Released: 0 BBL Recovered: 0 BBL Lost: 0 BBL.	
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Coolant. Did not touch ground.	

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QUESTIONS, Page 2

Action 490475

QUESTI	ONS (continued)
Operator:	OGRID:
ET Gathering & Processing, LLC 8111 Westchester Drive	371183
Dallas, TX 75225	Action Number: 490475
	Action Type:
	[C-141] Revegetation Report C-141 (C-141-v-Revegetation)
QUESTIONS	
Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	More info needed to determine if this will be treated as a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (2) an unauthorized release of a volume that: (a) results in a fire or is the result of a fire.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e.	e. gas only) are to be submitted on the C-129 form.
Initial Response	
The responsible party must undertake the following actions immediately unless they could create a s	rafety hazard that would result in injury.
The source of the release has been stopped	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	Not answered.
	iation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative ted or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of valuation in the follow-up C-141 submission.
to report and/or file certain release notifications and perform corrective actions for releate the OCD does not relieve the operator of liability should their operations have failed to a	knowledge and understand that pursuant to OCD rules and regulations all operators are require asses which may endanger public health or the environment. The acceptance of a C-141 report by adequately investigate and remediate contamination that pose a threat to groundwater, surface t does not relieve the operator of responsibility for compliance with any other federal, state, or
	Name: Samantha Figueroa
I hereby agree and sign off to the above statement	Title: Environmental Specialist
	Email: samantha.figueroa@energytransfer.com Date: 07/30/2025

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QUESTIONS, Page 3

Action 490475

QUESTIONS (continued)

Operator:	OGRID:
ET Gathering & Processing, LLC	371183
8111 Westchester Drive	Action Number:
Dallas, TX 75225	490475
	Action Type:
	[C-141] Revegetation Report C-141 (C-141-v-Revegetation)

QUESTIONS

Site Characterization		
Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). 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 in feet below ground surface (ft bgs)	Between 100 and 500 (ft.)	
What method was used to determine the depth to ground water	NM OSE iWaters Database Search	
Did this release impact groundwater or surface water	No	
What is the minimum distance, between the closest lateral extents of the release ar	nd the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Between ½ and 1 (mi.)	
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1000 (ft.) and ½ (mi.)	
An occupied permanent residence, school, hospital, institution, or church	Between ½ and 1 (mi.)	
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between ½ and 1 (mi.)	
Any other fresh water well or spring	Between ½ and 1 (mi.)	
Incorporated municipal boundaries or a defined municipal fresh water well field	Between 1 and 5 (mi.)	
A wetland	Between 1000 (ft.) and ½ (mi.)	
A subsurface mine	Greater than 5 (mi.)	
An (non-karst) unstable area	Between 1 and 5 (mi.)	
Categorize the risk of this well / site being in a karst geology	Low	
A 100-year floodplain	Greater than 5 (mi.)	
Did the release impact areas not on an exploration, development, production, or storage site	No	

Remediation Plan		
Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.		
Requesting a remediation plan approval with this submission	Yes	
Attach a comprehensive report demonstrating the lateral and vertical extents of soil contaminatio	on associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.	
Have the lateral and vertical extents of contamination been fully delineated	Yes	
Was this release entirely contained within a lined containment area	No	
Soil Contamination Sampling: (Provide the highest observable value for each, in m	nilligrams per kilograms.)	
Chloride (EPA 300.0 or SM4500 Cl B)	0	
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	0	
GRO+DRO (EPA SW-846 Method 8015M)	0	
BTEX (EPA SW-846 Method 8021B or 8260B)	0	
Benzene (EPA SW-846 Method 8021B or 8260B)	0	
Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes complete which includes the anticipated timelines for beginning and completing the remediation.	ed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC,	
On what estimated date will the remediation commence	06/20/2025	
On what date will (or did) the final sampling or liner inspection occur	06/20/2025	
On what date will (or was) the remediation complete(d)	07/09/2025	
What is the estimated surface area (in square feet) that will be reclaimed	0	
What is the estimated volume (in cubic yards) that will be reclaimed	0	
What is the estimated surface area (in square feet) that will be remediated	0	
What is the estimated volume (in cubic yards) that will be remediated	0	
These estimated dates and measurements are recognized to be the best guess or calculation at the	he time of submission and may (be) change(d) over time as more remediation efforts are completed.	

The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to

significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

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QUESTIONS, Page 4

Action 490475

QUESTIONS (continued)

Operator:	OGRID:
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8111 Westchester Drive	Action Number:
Dallas, TX 75225	490475
	Action Type:
	[C-141] Revegetation Report C-141 (C-141-v-Revegetation)

QUESTIONS

Remediation Plan (continued)		
Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.		
This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:		
(Select all answers below that apply.)		
(Ex Situ) Excavation and off-site disposal (i.e. dig and haul, hydrovac, etc.)	No	
(Ex Situ) Excavation and on-site remediation (i.e. On-Site Land Farms)	No	
(In Situ) Soil Vapor Extraction	No	
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	No	
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	No	
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	No	
Ground Water Abatement pursuant to 19.15.30 NMAC	No	
OTHER (Non-listed remedial process)	Yes	
Other Non-listed Remedial Process. Please specify	Variance request submitted and approved on 7/8/2025.	

Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation

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.

Name: Samantha Figueroa Title: Environmental Specialist I hereby agree and sign off to the above statement Email: samantha.figueroa@energytransfer.com Date: 07/30/2025

The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to

significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

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

QUESTIONS, Page 5

Action 490475

QUESTIONS (continued)

Operator:	OGRID:
ET Gathering & Processing, LLC	371183
8111 Westchester Drive	Action Number:
Dallas, TX 75225	490475
	Action Type:
	[C-141] Revegetation Report C-141 (C-141-v-Revegetation)

QUESTIONS

Deferral Requests Only	
Only answer the questions in this group if seeking a deferral upon approval this submission. Each of the following items must be confirmed as part of any request for deferral of remediation.	
Requesting a deferral of the remediation closure due date with the approval of this submission	No

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

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QUESTIONS, Page 6

Action 490475

QUESTIONS (continued)

Operator:	OGRID:
ET Gathering & Processing, LLC	371183
8111 Westchester Drive	Action Number:
Dallas, TX 75225	490475
	Action Type:
	[C-141] Revegetation Report C-141 (C-141-v-Revegetation)

QUESTIONS

pling Event Information	
Last sampling notification (C-141N) recorded	483387
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	06/19/2025
What was the (estimated) number of samples that were to be gathered	0
What was the sampling surface area in square feet	0

Remediation Closure Request		
Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.		
Requesting a remediation closure approval with this submission	Yes Yes	
Have the lateral and vertical extents of contamination been fully delineated		
Was this release entirely contained within a lined containment area	No	
All areas reasonably needed for production or subsequent drilling operations have been stabilized, returned to the sites existing grade, and have a soil cover that prevents ponding of water, minimizing dust and erosion	Yes	
What was the total surface area (in square feet) remediated	0	
What was the total volume (cubic yards) remediated	0	
All areas not reasonably needed for production or subsequent drilling operations have been reclaimed to contain a minimum of four feet of non-waste contain earthen material with concentrations less than 600 mg/kg chlorides, 100 mg/kg TPH, 50 mg/kg BTEX, and 10 mg/kg Benzene	Yes	
What was the total surface area (in square feet) reclaimed	0	
What was the total volume (in cubic yards) reclaimed	0	
Summarize any additional remediation activities not included by answers (above)	Variance request submitted and approved 7/8/2025.	

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (in .pdf format) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Name: Samantha Figueroa
Title: Environmental Specialist
Email: samantha.figueroa@energytransfer.com
Date: 07/30/2025

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

QUESTIONS, Page 7

Action 490475

QUESTIONS (continued)

Operator:	OGRID:
ET Gathering & Processing, LLC	371183
8111 Westchester Drive	Action Number:
Dallas, TX 75225	490475
	Action Type: [C-141] Revegetation Report C-141 (C-141-v-Revegetation)
QUESTIONS	
Reclamation Report	
Only answer the questions in this group if all reclamation steps have been completed.	
Requesting a reclamation approval with this submission	Yes
What was the total reclamation surface area (in square feet) for this site	0
What was the total volume of replacement material (in cubic yards) for this site	0
	four feet of non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 over must include a top layer, which is either the background thickness of topsoil or one foot of suitable material
Is the soil top layer complete and is it suitable material to establish vegetation	Yes
On what (estimated) date will (or was) the reseeding commence(d)	07/08/2025
Summarize any additional reclamation activities not included by answers (above)	Variance request submitted and approved 7/8/2025.
	reclamation requirements and any conditions or directives of the OCD. This demonstration should be in the form it field notes, photographs of reclaimed area, and a narrative of the reclamation activities. Refer to 19.15.29.13
I have been a suife, the state information without the suife and a sure late to the best form	Imposed and an advantaged that recognist to OCD makes and requisitions all an action of the control of the cont
to report and/or file certain release notifications and perform corrective actions for releate the OCD does not relieve the operator of liability should their operations have failed to water, human health or the environment. In addition, OCD acceptance of a C-141 report	knowledge and understand that pursuant to OCD rules and regulations all operators are required asses which may endanger public health or the environment. The acceptance of a C-141 report by adequately investigate and remediate contamination that pose a threat to groundwater, surface rt does not relieve the operator of responsibility for compliance with any other federal, state, or tially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed ing notification to the OCD when reclamation and re-vegetation are complete.
I hereby agree and sign off to the above statement	Name: Samantha Figueroa Title: Environmental Specialist

Email: samantha.figueroa@energytransfer.com

Date: 07/30/2025

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QUESTIONS, Page 8

Action 490475

QUESTIONS (continued)

	Operator:	OGRID:
ı	ET Gathering & Processing, LLC	371183
	8111 Westchester Drive	Action Number:
ı	Dallas, TX 75225	490475
ı		Action Type:
		[C-141] Revegetation Report C-141 (C-141-v-Revegetation)

QUESTIONS

Revegetation Report		
Only answer the questions in this group if all surface restoration, reclamation and re-vegetation obligations have been satisfied.		
Requesting a restoration complete approval with this submission	Yes	
What was the total revegetation surface area (in square feet) for this site	0	
Per Paragraph (2) of Subsection D of 19.15.29.13 NMAC the responsible party must reseed disturbed area in the first favorable growing season following closure of the site.		
On what date did the reseeding commence	07/08/2025	
On what date was the vegetative cover inspected	07/20/2025	
What was the life form ratio compared to pre-disturbance levels	51	
What was the total percent plant cover compared to pre-disturbance levels	71	
Summarize any additional revegetation activities not included by answers (above)	Variance request submitted and approved 7/8/2025. This demonstration should be in the form	

of attachments (in .pdf format) including a scaled site map, any life form ratio and percent plant cover sampling diagrams or other relevant field notes, photographs of re-vegetated areas, and a narrative of the revegetation activities. Refer to 19.15.29.13 NMAC.

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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

I hereby agree and sign off to the above statement

Name: Samantha Figueroa

Title: Environmental Specialist

Email: samantha.figueroa@energytransfer.com

Date: 07/30/2025

Per Paragraph (4) of Subsection (D) of 19.15.29.13 NMAC for any major or minor release containing liquids, the responsible party must notify the division when reclamation and re-vegetation are complete.

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CONDITIONS

Action 490475

CONDITIONS

Operator:	OGRID:
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8111 Westchester Drive	Action Number:
Dallas, TX 75225	490475
	Action Type:
	[C-141] Revegetation Report C-141 (C-141-v-Revegetation)

CONDITIONS

Creat	ed By Condition	Condition Date
scw	ells None	7/31/2025