



Targa Midstream Services LLC
6 Desta Drive, Suite 3300
Midland, TX 79705
432.688.0555
www.targaresources.com

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Appendix A – NMOCD Initial C-141 and E-mail Correspondence

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December 18, 2024

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

Re: NMOCD #nAPP2425552690
Rojo Toro #7 Purge Event
32.21368, -103.44406
U/L N, Section 14, Township 24 South, Range 34 East

Section 1: Event Details

NMOCD Incident ID #nAPP2425552690 pertains to a residue gas purge event that occurred post processing and prior to custody transfer on February 16, 2024. There were no liquids released during the residue purge event. Please see the photos attached as Appendix C, showing no staining below the release point. This event was originally reported on a C-129 form on February 19, 2024 and assigned incident ID nAPP2405056597. Upon further review and per NMOCD direction, nAPP2405056597 did not meet the requirements of Part 27 or Part 28 NMAC, therefore the C-129 was cancelled using a C-129C form and an Initial C-141 submitted being assigned incident ID #nAPP2425552690. Reasoning for the venting event is summarized below.

Gas was vented to atmosphere to purge the pipeline of off-spec residue gas. It was necessary to purge the line to bring the residue gas line back within specification. Third party gas producers delivered off spec gas to the inlet of the processing facilities which resulted in off spec gas in the residue line. Gas was vented until the pipeline was purged. Once the residue gas was back within spec, the emission event ended. Please see Figure 9 illustrating the purge point.

Section 2: Site Characteristics

A. Depth to Groundwater

Targa reviewed available depth to groundwater information available through the New Mexico Office of the State Engineer (NMOSE) and the United States Geologic Survey (USGS) for registered water wells within a half-mile radius of the site. NMOSE POD 1 C-09943 was identified approximately 1.4 miles to the southwest of the site. Static water level was measured in the well at 431 feet below ground surface (ft bgs). NMOSE POD 1 C-09943 was drilled in April 2016.

The Site Location & Groundwater Map included as Figure 1 illustrates the location of the registered water wells within the vicinity of the site, and a summary of depth to groundwater information and well log is provided as Appendix B.

B. Karst Potential & Subsurface Mines

Targa utilized the publicly available karst potential map published by the New Mexico Oil Conservation Division to determine the potential for encountering karst formations beneath the site. Review of the NMOCD



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karst potential map indicates that the site is not located in an area of high potential to encounter karstic features. The distance to critical Karst features is 47.3 miles from the site.

Targa utilized the NMOCD database, Registered Mines in New Mexico to determine that there are no subsurface mines beneath or in the vicinity of the site.

Areas of high/critical karst and subsurface mine locations are illustrated on Figures 2A and 2B.

C. Distance to Nearest Potable Water Well

The nearest potable water well was identified as POD 1 CP-4682. The well is located 2.31 miles from the site and as of 2023 was utilized for domestic use. The location of CP-4682 is shown on the attached Figure 3.

D. Distance to Nearest Surface Water

Targa reviewed aerial imagery and the National Wetland Inventory Map, published by the U.S. Fish and Wildlife Service, for wetlands and NMOCD database for surface water in the vicinity of the site. The nearest surface water is located 7.73 miles from the site. The location of the nearest wetland is 1.08 miles northwest of the site. Surface water is illustrated on Figure 4 and surface water body on Figure 5. In addition to the surface water and wetland imagery, there is a riverine feature located approximately 0.64 miles southeast of the site. While this feature is mapped on the US Fish and Wildlife depicts it as a riverine feature, it is not a continuously flowing watercourse. The non-continuously flowing riverine feature is illustrated in Figure 6.

E. 100-year Floodplain

Review of flood map data published by the Federal Emergency Management Agency (FEMA) indicates the site is not within a 100-year floodplain. A copy of the FEMA FIRMet Map can be found attached as Figure 7.

F. Residence, School, Hospital, or Institution

Review of aerial imagery did not show that the site is within 300 feet (ft) of an occupied permanent residence, school, hospital, or institution. Distance to the nearest occupied permanent residence is approximately 8.05 miles from the site and is illustrated in Figure 8.

G. Proximity to Sensitive Receptors and Site Characteristics Summary

The table below denotes if the site is located within the minimum allowable distance from a sensitive receptor, as defined in New Mexico Administrative Code (NMAC) 19.15.29.

Site Characteristics Summary		
Approximate depth to groundwater:	~431 ft bgs	
Within an area of high karst potential?	☐ Yes	☒ No
Within 300 ft. of any continuously flowing of significant watercourse?	☐ Yes	☒ No
Within 200 ft. of any lakebed, sinkhole, or playa lake?	☐ Yes	☒ No
Within 300 ft. of an occupied permanent residence, school, hospital, or institution?	☐ Yes	☒ No
Within 500 ft. of a spring or private, domestic fresh water well?	☐ Yes	☒ No



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Within 1,000 ft. of any fresh water well?	☐ Yes	☒ No
Within the incorporated municipal boundaries or within a municipal well field?	☐ Yes	☒ No
Within 300 ft. of a wetland?	☐ Yes	☒ No
Within the area overlying a subsurface mine?	☐ Yes	☒ No
Within a 100-year floodplain?	☐ Yes	☒ No

Section 3: Remediation Action Levels

NMOCD assessment and cleanup levels for hydrocarbon and produced water releases are based on depth to groundwater and proximity to sensitive receptors as established in NMAC 19.15.29. Therefore, the NMOCD Action Levels for a site with a depth to groundwater less than 50 feet bgs are applicable at the site, due to proximity of closest well being greater than a half mile; these Action Levels are as follows:

Constituent	Remediation Action Level
Chloride	600 mg/kg
TPH (GRO+DRO+MRO)	100 mg/kg
BTEX	50 mg/kg
Benzene	10 mg/kg

TPH – total petroleum hydrocarbons

DRO – diesel range organics

BTEX – benzene, toluene, ethylbenzene, total xylenes

GRO – gasoline range organics

MRO – motor/lube oil range organics

mg/kg – milligrams per kilogram

Section 4: Reclamation Action Levels

NMAC 19.15.29.13(D) codifies, and the Procedures for Implementation of the Spill Rule, dated September 6, 2019, clarifies that the top four feet of the remediated area should be non-waste containing. Therefore, the NMOCD Reclamation Standards are applied to the top four feet of any area impacted by a release that is not located within an active production facility. NMOCD Reclamation Standards are as follows:

Constituent	Remediation Action Level
Chloride	600 mg/kg
TPH (GRO+DRO+MRO)	100 mg/kg
BTEX	50 mg/kg
Benzene	10 mg/kg

TPH – total petroleum hydrocarbons

DRO – diesel range organics

BTEX – benzene, toluene, ethylbenzene, total xylenes

GRO – gasoline range organics

MRO – motor/lube oil range organics

mg/kg – milligrams per kilogram

Section 5: Remediation/Variance Request

This was an above ground residue gas only purge to atmosphere event due to off-spec gas being sent from producers. The purge event did not release any liquids to the ground, photographs are shown in Appendix C illustrating no staining to soil. Per NMOCD direction on September 6, 2024, Targa is respectfully requesting a variance to NMAC Part 29 sampling requirements due to the absence of liquids released.



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Section 6: Reclamation & Revegetation Variance Request

The Rojo Toro #7 purge event occurred at an active Targa Facility constructed on a caliche pad. There were no liquids released and no soil impact, therefore no remediation required of Targa. Targa has no known plans to deconstruct the Rojo Toro facility, as a result reclamation and revegetation would be infeasible at this time. A variance to reclamation and revegetation requirements is respectfully requested due to current use and infeasibility.

Section 7: Closure Request

Based on this event being a residue gas only purge due to off-spec gas with no liquids released, Targa believes that applicable portions of NMAC 19.15.29 have been met and would like to respectfully request closure of Incident ID #nAPP2425552690. Should you have any questions, please feel free to contact me at (575)635-9096 or agroves@targaresources.com.

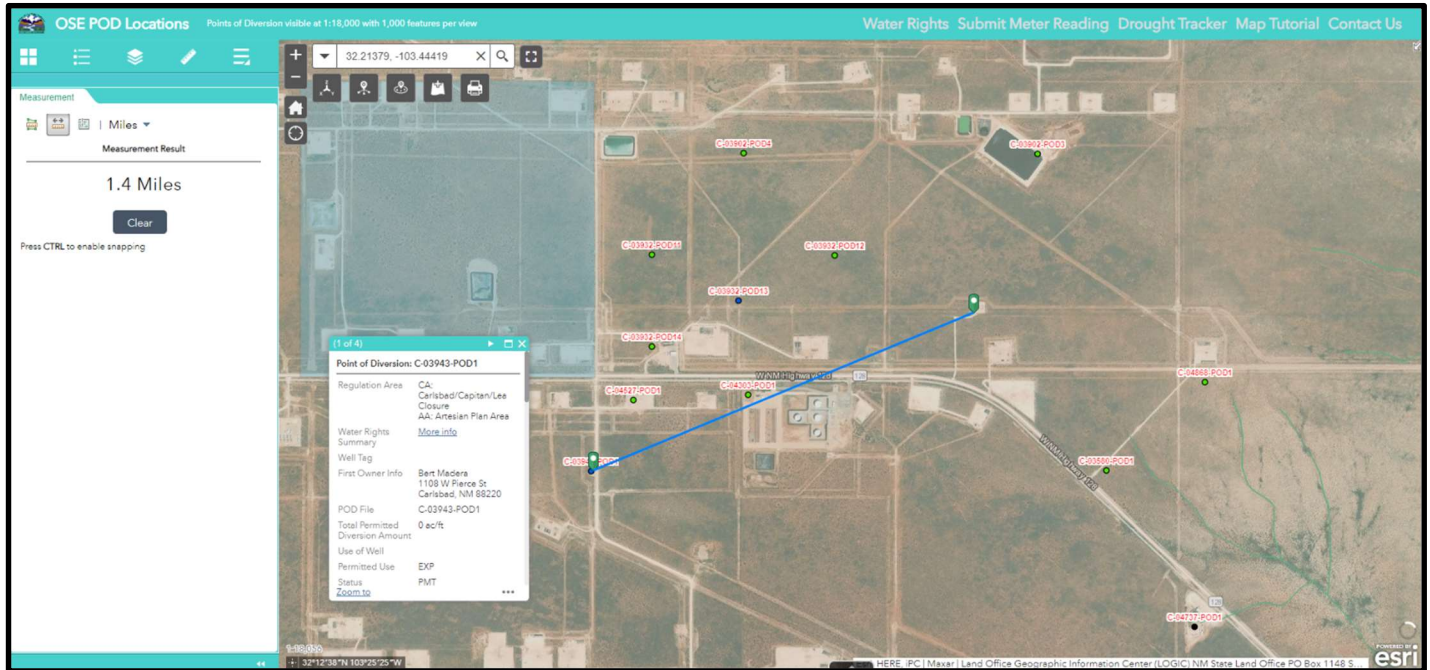
Thank you,

Amber Groves
ES&H Staff Specialist



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Figure 1

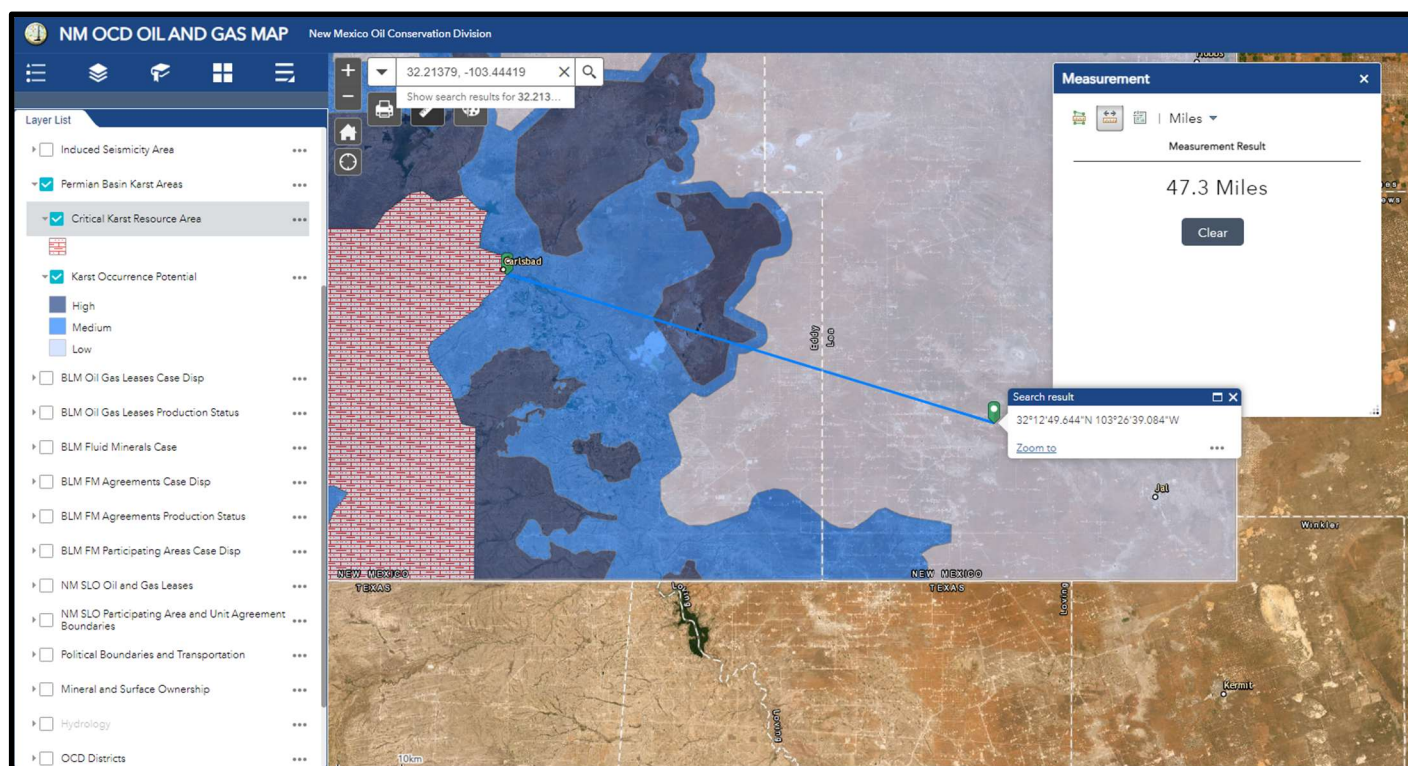


NMOSE POD 1 C-03943 Map



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Figure 2A

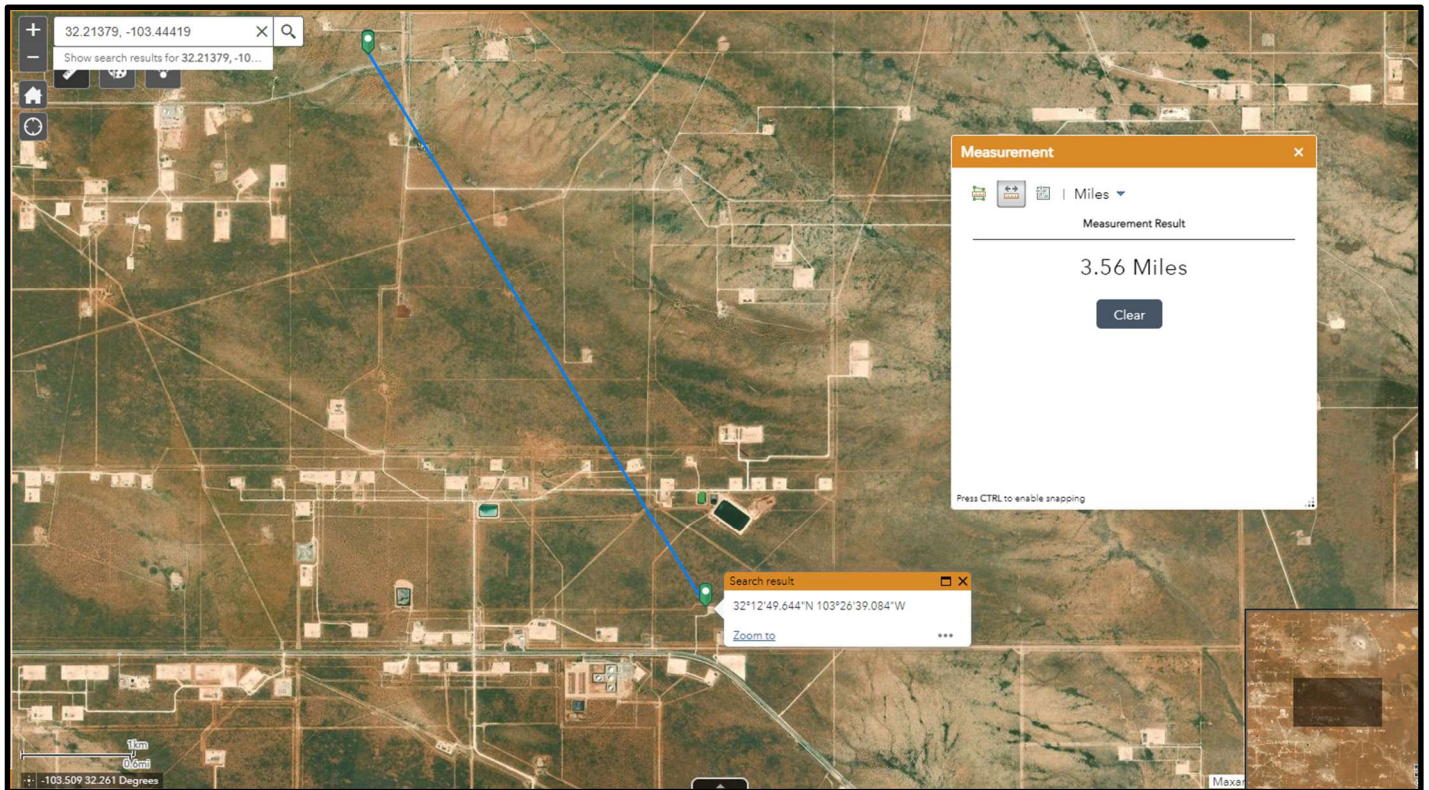


NMOCD Karst Potential Map



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Figure 2B

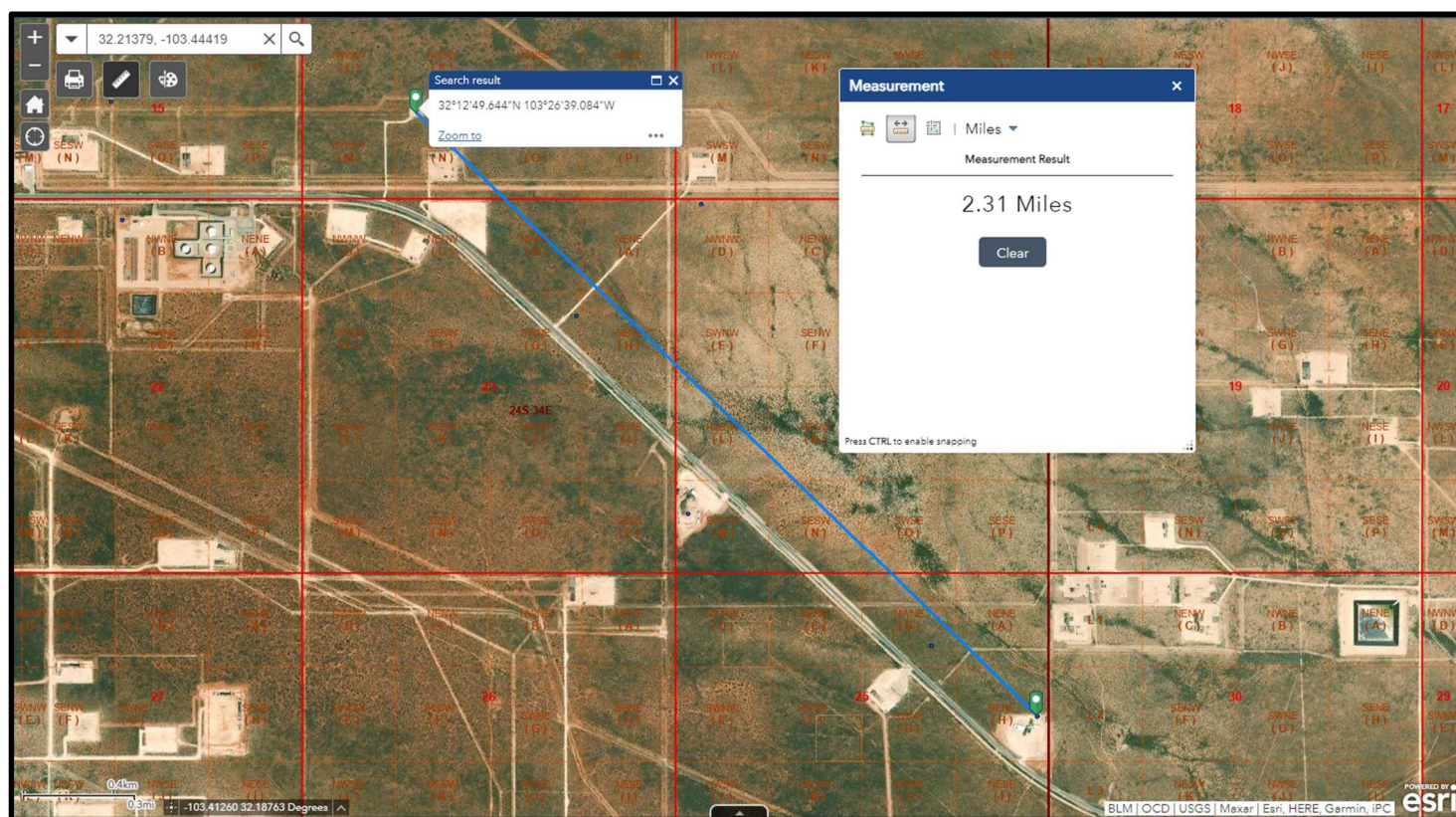


NMOCD Registered Mine Map



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Figure 3

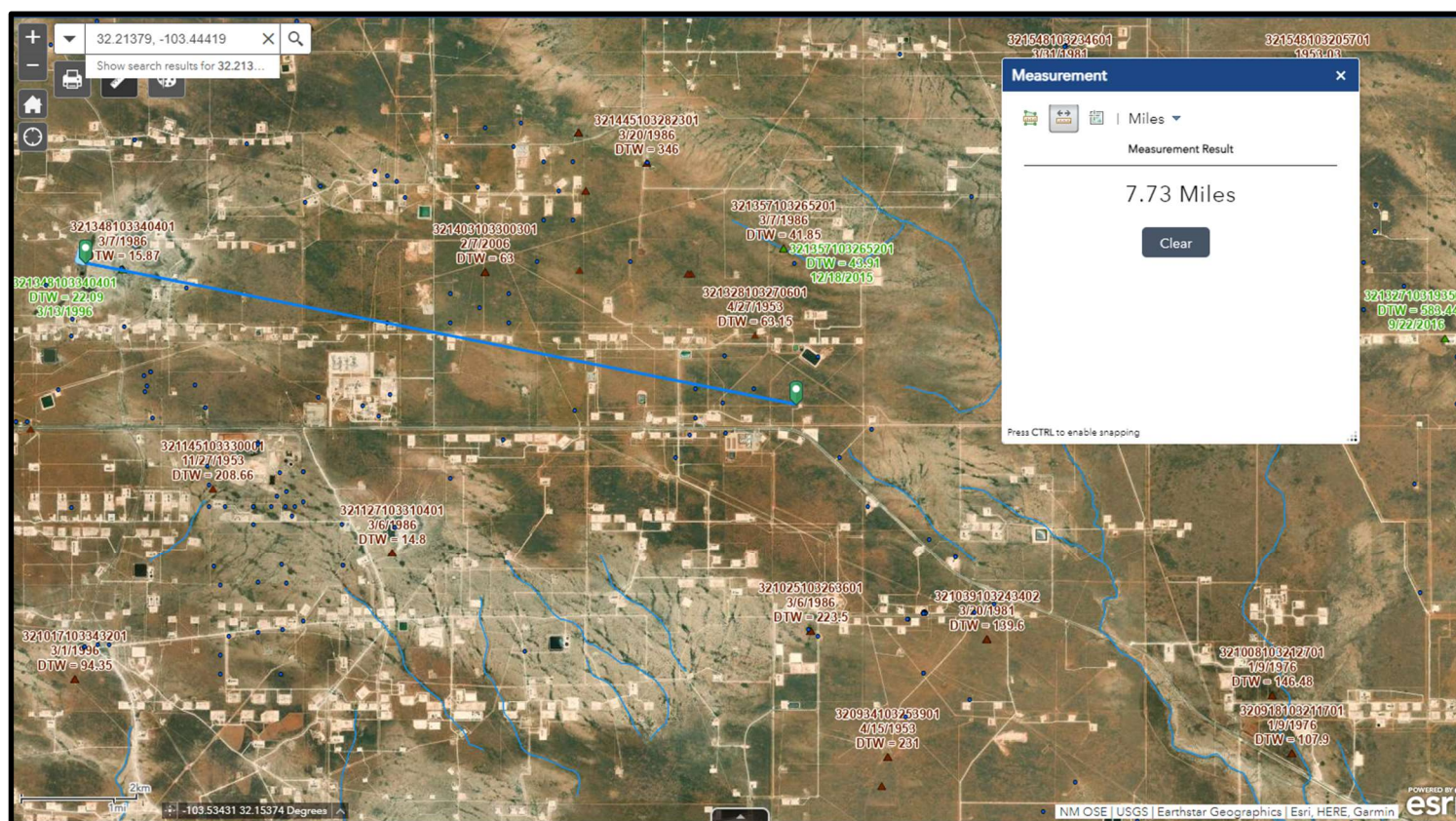


NMOSE POD 1 C-4682 Map



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Figure 4

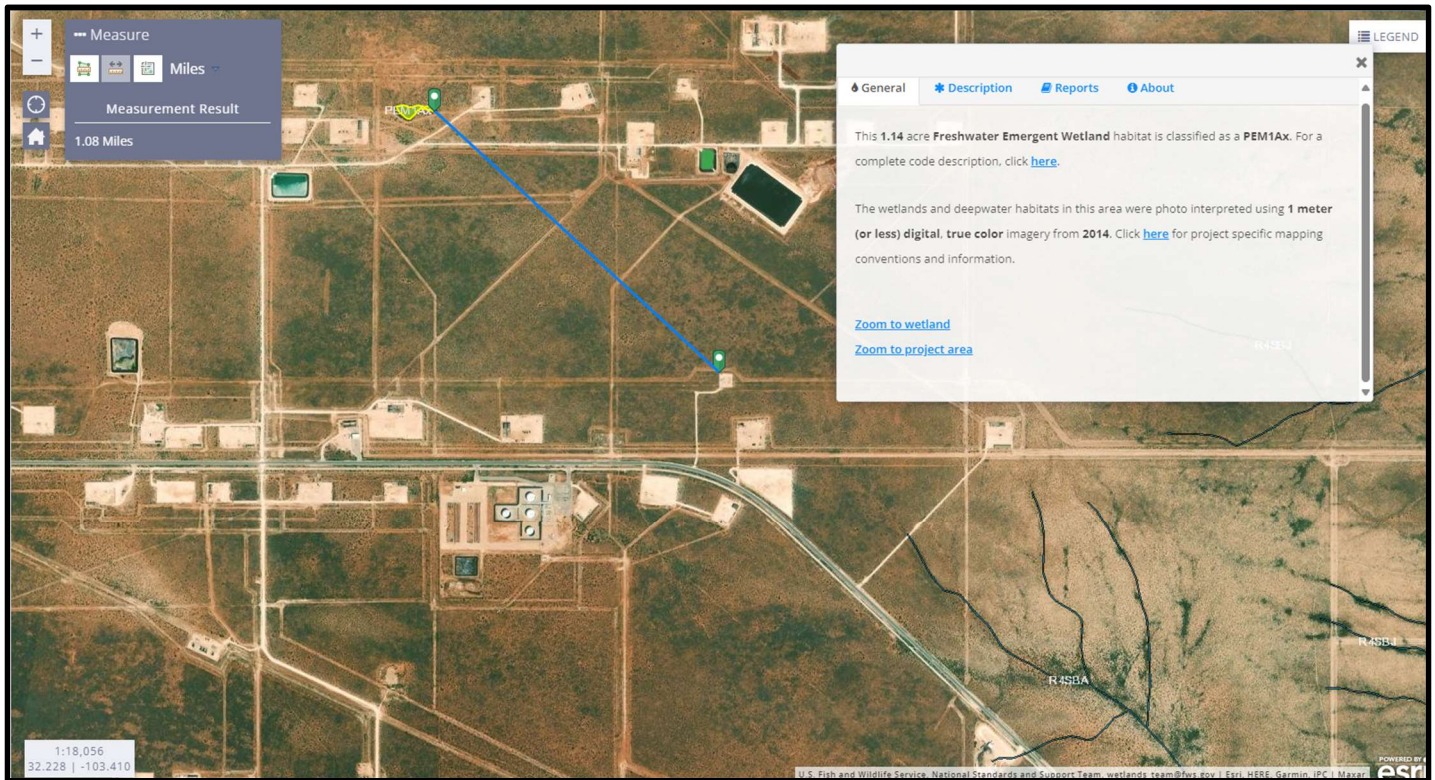


NMOCD Surface Water Map



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Figure 5

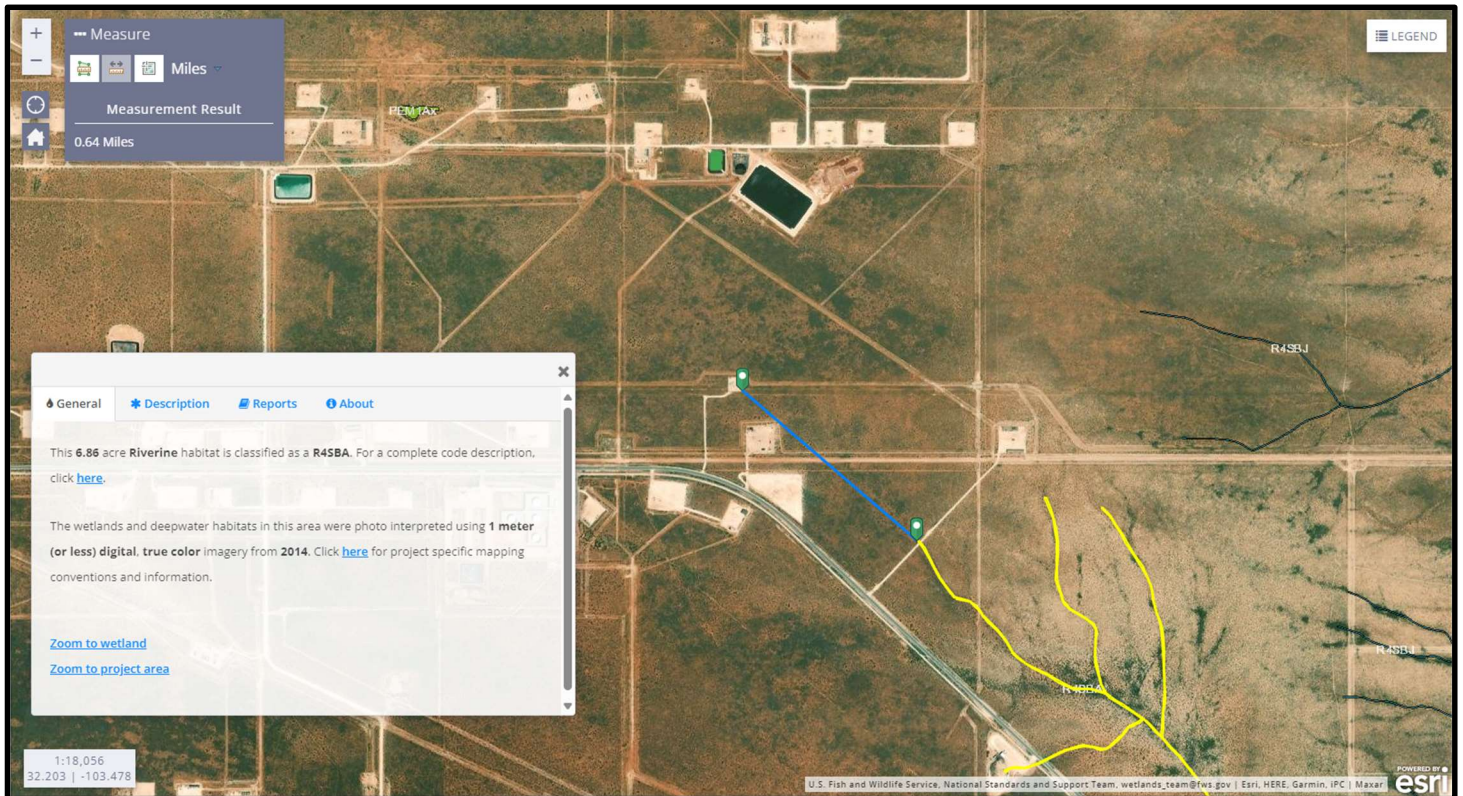


US Fish and Wildlife Wetlands Map



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Figure 6

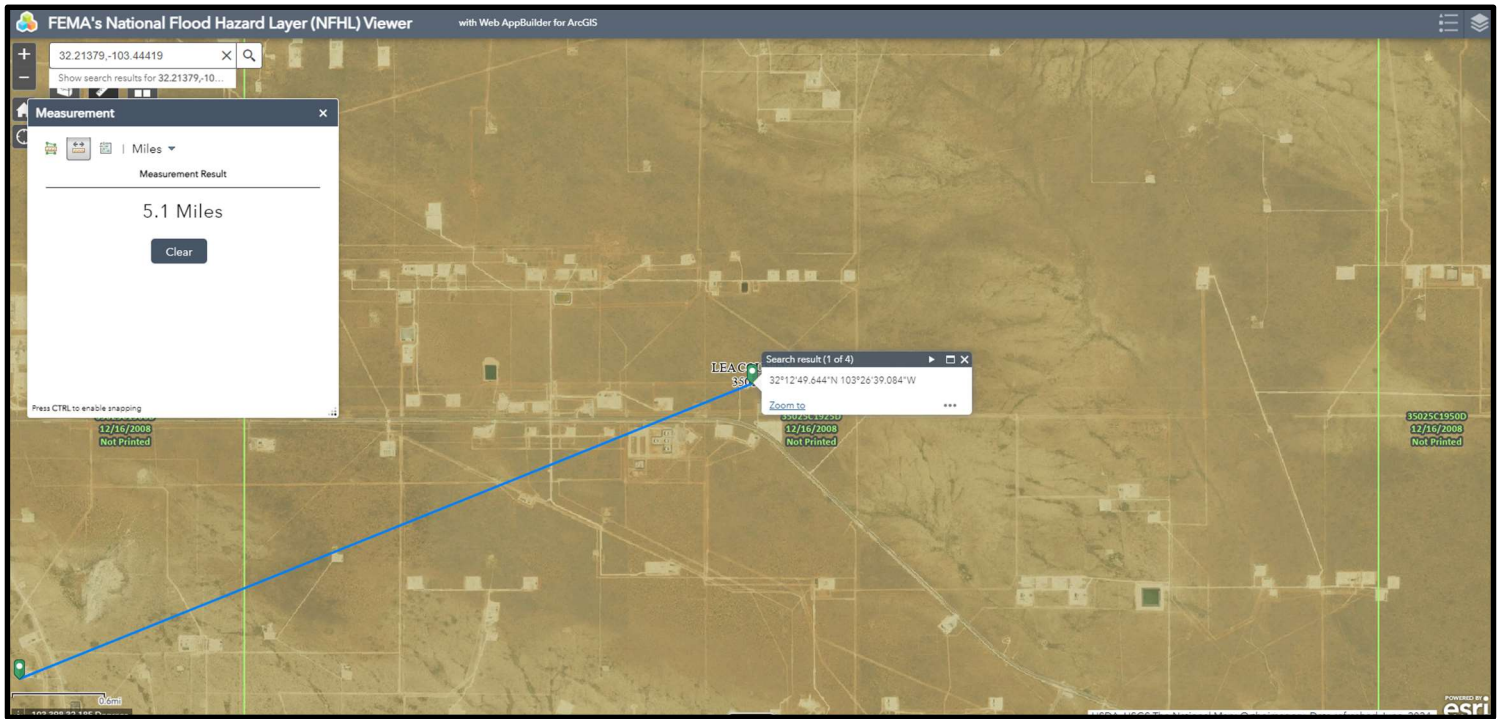


US Fish and Wildlife Riverine Map



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Figure 7

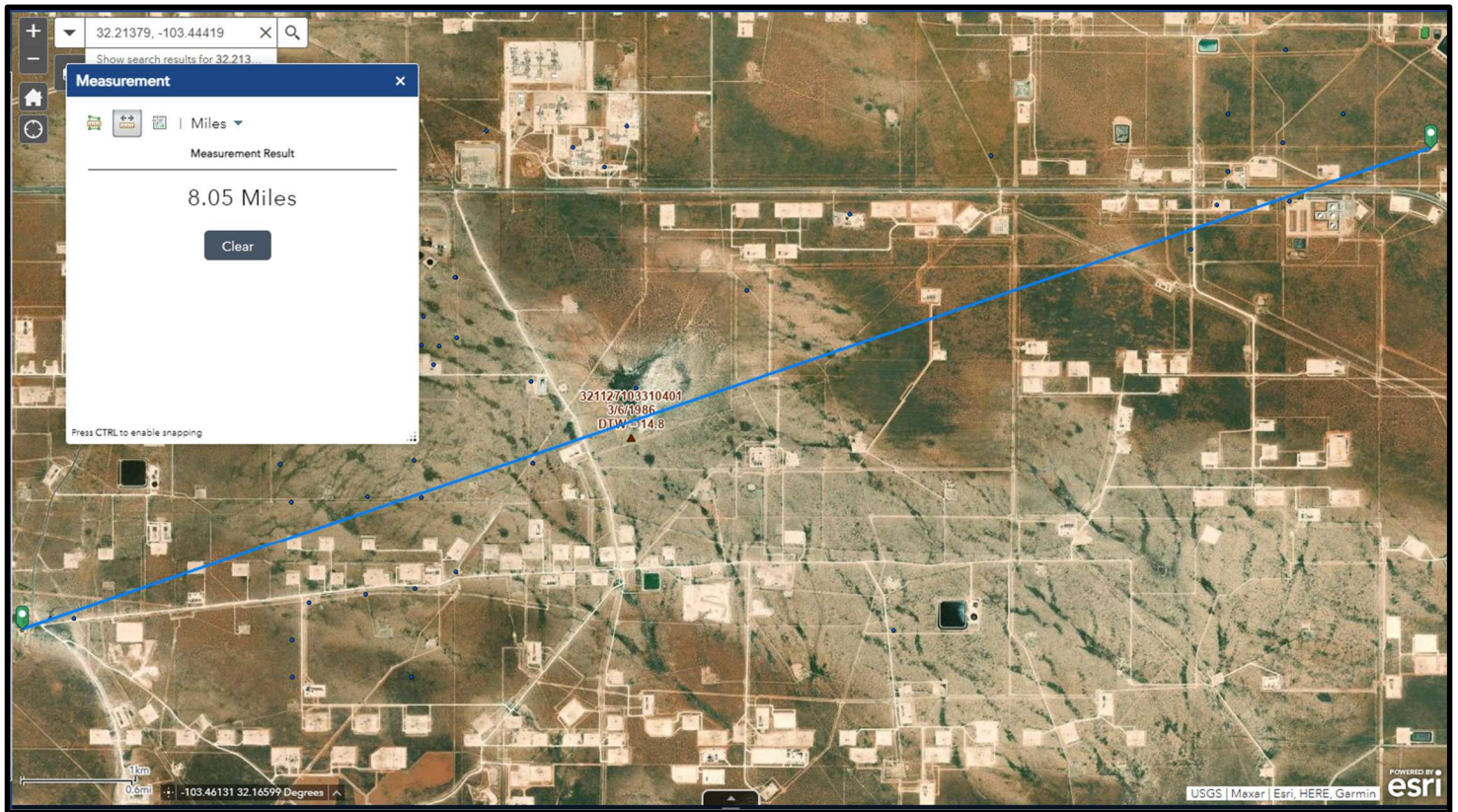


FEMA 100-Year Floodplain Map



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Figure 8



Nearest Permanent Residence Map



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Figure 9



Green Circle Indicates Purge Point at Rojo Toro Facility

APPENDIX A –NMOCD Initial C-141 & E-mail Correspondence

OCD Permitting

Home Submissions Releases C-141 Submit Application

Submit Fee [C-141] Release Corrective Action (C-141)

Submission Contact, Application, Fee and Payment Details

First Name:

Amber

Last Name:

Groves

Email:

agroves@targaresources.com

Edit Submission Contact Details

Application Status:

Draft Application

Please call (505) 476-3441 or email ocd.fees@state.nm.us for support.

OCD currently accepts payment only by credit card.

Fee Amount:

\$150.00

Application Details

Type	ID		District	County	Location
Incident ID	[nAPP2425552690]	Delete	Hobbs	Lea	N-14-24S-34E 0 FNL 0 FEL 32,21368,-103.44406 NAD83

Note: Changing or deleting this ID will clear all the answers for this current application.

Method of submission

Upload Attachment(s):

Attachment Type (Description) Tag(s)	Original Uploaded File Name
Volume Calculation Add Tag	corrected_Rojo_toro_purge_2_16_17_2024X2.pdf (218 KB) Replace Delete
	Files: 1 Total Size: 218 KB

Add Application Attachments

Notice: It is your responsibility to verify that your uploaded application and attachments are complete and attached successfully.

- If your upload is successful and your application or attachments contains fillable fields, use the link above to verify all the fields are being populated appropriately.
- If the fields in your file(s) are not being populated after uploading, we recommend using your editing software to flatten or restrict the editing options on your file(s) prior to uploading.
- Use the delete link to remove any attachment and re-upload a new file; only the current attachment(s) is submitted for review.

Questions

Prerequisites

Incident Operator

[331548] Targa Northern Delaware, LLC.

Incident Type

Vent

Incident Status

Notification Accepted

Incident Well

Incident Facility

[fAPP2123031392] TARGA NORTHERN DELAWARE, LLC.

• Surface Owner [Private](#) [Clear](#)

Incident Details

Please answer all the questions in this group.

• Incident Type [Vent](#) [Clear](#)

• Did this release result in a fire or is the result of a fire [No](#) [Clear](#)

• Did this release result in any injuries [No](#) [Clear](#)

• Has this release reached or does it have a reasonable probability of reaching a watercourse [No](#) [Clear](#)

• Has this release endangered or does it have a reasonable probability of endangering public health [No](#) [Clear](#)

• Has this release substantially damaged or will it substantially damage property or the environment [No](#) [Clear](#)

• Is this release of a volume that is or may with reasonable probability be detrimental to fresh water [No](#) [Clear](#)

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 

• Produced Water Released (bbls) Details 

• Is the concentration of chloride in the produced water >10,000 mg/l [No](#) [Clear](#)

• Condensate Released (bbls) Details 

Δ Natural Gas Vented (Mcf) Details [Cause: Other](#) | [Pipeline \(Any\)](#) | [Natural Gas Vented](#) | [Released: 20,422 Mcf](#) | [Recovered: 0 Mcf](#) | [Lost: 20,422 Mcf](#) [Clear](#) [Reset](#)

• Natural Gas Flared (Mcf) Details 

Δ Other Released Details  [Reset](#)

• Are there **additional details** for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts) 

Nature and Volume of Release (continued)

• Is this a gas only submission (i.e. only significant Mcf values reported) Yes, according to supplied volumes this appears to be 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:
(3) an unauthorized release of gases exceeding 500 MCF.

With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.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 safety hazard that would result in injury.

• The source of the release has been stopped [True](#) [Clear](#)

• The impacted area has been secured to protect human health and the environment [True](#) [Clear](#)

• Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices [True](#) [Clear](#)

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.

Δ

I hereby agree and sign off to the above statement

[Name: Amber Groves](#)

[Title: Environmental Specialist](#)

[Email: \[agroves@targaresources.com\]\(mailto:agroves@targaresources.com\)](#)

[Date: 09/11/2024](#)

Clear

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)

+
- What method was used to determine the depth to ground water

+
- Did this release impact groundwater or surface water

+

What is the minimum distance, between the closest lateral extents of the release and the following surface areas:

- A continuously flowing watercourse or any other significant watercourse

+
- Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)

+
- An occupied permanent residence, school, hospital, institution, or church

+
- A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes

+
- Any other fresh water well or spring

+
- Incorporated municipal boundaries or a defined municipal fresh water well field

+
- A wetland

+
- A subsurface mine

+
- An (non-karst) unstable area

+
- Categorize the risk of this well / site being in a karst geology

+
- A 100-year floodplain

+
- Did the release impact areas not on an exploration, development, production, or storage site

+

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

No

Clear

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.

Make Payment Delete

Groves, Amber L.

From: Groves, Amber L.
Sent: Monday, September 16, 2024 9:24 AM
To: Nelson.Velez@state.nm.us
Subject: FW: [EXTERNAL] Re: C-129's Vs. C-141's

This is the correspondence between Cory and I on these events.

Thank you!

Amber

From: Groves, Amber L.
Sent: Monday, September 9, 2024 3:04 PM
To: Eales, Matt <meales@targaresources.com>; Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>
Cc: Reynolds, Sylwia A. <sreynolds@targaresources.com>; Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>
Subject: RE: [EXTERNAL] Re: C-129's Vs. C-141's

Thank you, Cory!

I will get these C-129's cancelled and the initial C-141's submitted this week.

Thank you,

Amber

From: Eales, Matt <meales@targaresources.com>
Sent: Sunday, September 8, 2024 8:02 AM
To: Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>; Groves, Amber L. <agroves@targaresources.com>
Cc: Reynolds, Sylwia A. <sreynolds@targaresources.com>; Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>
Subject: RE: [EXTERNAL] Re: C-129's Vs. C-141's

Cory,

Thank you for your testing of the system and detailed email. We will begin work on this in the coming week.

All the best,
Matt
832.496.7513

From: Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>
Sent: Friday, September 6, 2024 3:34 PM
To: Groves, Amber L. <agroves@targaresources.com>; Eales, Matt <meales@targaresources.com>
Cc: Reynolds, Sylwia A. <sreynolds@targaresources.com>; Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>
Subject: RE: [EXTERNAL] Re: C-129's Vs. C-141's

Amber,

I did some testing in our system and we current will not block submissions of Gas Only Releases on the C-141's.

Targa can submit these releases through the C-141 process. It is very important that in the "Other Information Section" Targa Identifies that this gas release does not meet the requirements of Part 27 or 28 NMAC. I would also reiterate that point in your Executive summary. Each C-141 Packet should include all the information required in 19.15.29 NMAC (I.e site maps, pictures executive summary's etc.). Additionally Targa will need to include variances to the requirements for collection of soil samples, and reclamation/ revegation.

Thanks,

Cory Smith • Environmental Projects Supervisor
Environmental Bureau
EMNRD - Oil Conservation Division
5200 Oakland Avenue N.E Suite 100 | Albuquerque, NM 87113
505.419.2687 | Cory.Smith@emnrd.nm.gov
<http://www.emnrd.state.nm.us/OCD/>

From: Groves, Amber L. <agroves@targaresources.com>
Sent: Tuesday, August 27, 2024 11:37 AM
To: Eales, Matt <meales@targaresources.com>; Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>
Cc: Reynolds, Sylwia A. <sreynolds@targaresources.com>; Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>
Subject: RE: [EXTERNAL] Re: C-129's Vs. C-141's

Good Afternoon, Cory,

I just wanted to follow up on the email exchange below regarding how we should proceed with getting these C-129's entered as C-141's. We would also be happy to set up a call to discuss if that is more convenient for you.

Thank you,

Amber

From: Eales, Matt <meales@targaresources.com>
Sent: Wednesday, July 31, 2024 3:00 PM
To: Groves, Amber L. <agroves@targaresources.com>; Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>
Cc: Reynolds, Sylwia A. <sreynolds@targaresources.com>; Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>
Subject: RE: [EXTERNAL] Re: C-129's Vs. C-141's

Thanks Amber.

Cory – we are fine with submitting separate C-141s for each event. As we had discussed with Brandon and you, these events happened after our Red Hills Gas Processing Plant and, thus, are outside of the scope of the NMOCD Methane Rule so we are just trying to ensure they are filed appropriately in the right location in C-141.

Let me know if you'd like to have a follow-up call at your convenience.

All the best,
Matt

From: Groves, Amber L. <agroves@targaresources.com>
Sent: Tuesday, July 30, 2024 2:18 PM
To: Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>; Eales, Matt <meales@targaresources.com>

Cc: Reynolds, Sylwia A. <sreynolds@targaresources.com>; Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>

Subject: RE: [EXTERNAL] Re: C-129's Vs. C-141's

Cory,

Please see the attached. This is for the February 17th event as an example.

Thank you,

Amber

From: Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>

Sent: Tuesday, July 30, 2024 1:06 PM

To: Groves, Amber L. <agroves@targaresources.com>; Eales, Matt <meales@targaresources.com>

Cc: Reynolds, Sylwia A. <sreynolds@targaresources.com>; Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>

Subject: RE: [EXTERNAL] Re: C-129's Vs. C-141's

Amber,

Can you please provide me with a gas analysis of the discharge gas?

Cory Smith • Environmental Projects Supervisor
Environmental Bureau
EMNRD - Oil Conservation Division
5200 Oakland Avenue N.E Suite 100 | Albuquerque, NM 87113
505.419.2687 | Cory.Smith@emnrd.nm.gov
<http://www.emnrd.state.nm.us/OCD/>

From: Groves, Amber L. <agroves@targaresources.com>

Sent: Tuesday, July 30, 2024 12:57 PM

To: Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>; Eales, Matt <meales@targaresources.com>

Cc: Reynolds, Sylwia A. <sreynolds@targaresources.com>; Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>

Subject: RE: [EXTERNAL] Re: C-129's Vs. C-141's

Thank you, Cory. This was for the events that were past the plant process that OCD determined should be reported on C-141's instead of C-129's. They were blowdowns for off-spec gas, with no liquids released. Since we can't report on C-141's without liquids, we had discussed being able to turn in photos in lieu of going through the entire remediation process since there were no liquids released. With that information, would you look at the first two questions again, please?

Thank you!

Amber

From: Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>

Sent: Tuesday, July 30, 2024 12:16 PM

To: Eales, Matt <meales@targaresources.com>; Groves, Amber L. <agroves@targaresources.com>

Cc: Reynolds, Sylwia A. <sreynolds@targaresources.com>; Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>

Subject: RE: [EXTERNAL] Re: C-129's Vs. C-141's

All,

Its been a while since our conversation so I may have missed details we had discussed(Please remind me) so I will answer these with the information provided. A

1. Since an initial C-141 requires a liquid volume, how should this be handled? We won't have any liquids released on any of them.
 1. If there are no Liquids then you should be using a C-129 not a C-141
2. What would be required of us to be able to do the initial C-141 and follow through the Remediation and closure portions in one submittal? I believe the possibility of attaching photos of the blowdown location was discussed on our call to satisfy the remediation and closure portions, but would like to confirm.
 1. If you had a gas release with liquids, the operator would need to Follow All aspects of Part 29, that would include sampling impacted area, summary, maps, pictures, reclamation etc.
3. Does each event need to be it's own C-141, or do we have the possibility to combine them into one submittal?
 1. Each reportable event would need its own C-141.
4. I thought of another question on these events. Since I will be cancelling the C-129's, would I be able to use the same incident ID's or will I need to do the NOR for each one to create a new one?
 1. Need to Submit a C-129C and cancel the incident then submit a NOR/Initial C-141

Cory Smith • Environmental Projects Supervisor
Environmental Bureau
EMNRD - Oil Conservation Division
5200 Oakland Avenue N.E Suite 100 | Albuquerque, NM 87113
505.419.2687 | Cory.Smith@emnrd.nm.gov
<http://www.emnrd.state.nm.us/OCD/>

From: Eales, Matt <meales@targaresources.com>
Sent: Tuesday, July 30, 2024 9:58 AM
To: Groves, Amber L. <agroves@targaresources.com>
Cc: Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>; Reynolds, Sylwia A. <sreynolds@targaresources.com>
Subject: [EXTERNAL] Re: C-129's Vs. C-141's

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

Cory,

If it is of any help, I am in SF this week and can come by your office just to ensure we take the right steps in your eyes.

All the best,
Matt Eales
832-496-7513

On Jul 30, 2024, at 8:33 AM, Groves, Amber L. <agroves@targaresources.com> wrote:

Good Morning, Cory,

I thought of another question on these events. Since I will be cancelling the C-129's, would I be able to use the same incident ID's or will I need to do the NOR for each one to create a new one?

Thank you!

Amber

From: Groves, Amber L.

Sent: Monday, July 29, 2024 11:32 AM

To: Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>; Reynolds, Sylwia A. <sreynolds@targaresources.com>

Cc: Eales, Matt <meales@targaresources.com>

Subject: C-129's Vs. C-141's

Good Morning, Cory!

As a follow up to our discussion on the event's that we need to cancel the C-129's and submit C-141's, I would like to confirm how we need to do this. Would you be able to give clarification on the below, please?

1. Since an initial C-141 requires a liquid volume, how should this be handled? We won't have any liquids released on any of them.
2. What would be required of us to be able to do the initial C-141 and follow through the Remediation and closure portions in one submittal? I believe the possibility of attaching photos of the blowdown location was discussed on our call to satisfy the remediation and closure portions, but would like to confirm.
3. Does each event need to be it's own C-141, or do we have the possibility to combine them into one submittal?

If a meeting would be easier, we would be more than happy to discuss that way! Please let me know if you would prefer that and what your availability would be.

Thank you,

Amber

<image001.jpg>

Amber Groves | Targa Resources | ES&H Staff Specialist

Cell: (575)635-9096 | agroves@targaresources.com

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Groves, Amber L.

From: Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>
Sent: Friday, November 15, 2024 11:30 AM
To: Eales, Matt; Groves, Amber L.; Reynolds, Sylwia A.
Cc: Maxwell, Ashley, EMNRD
Subject: RE: [EXTERNAL] The Oil Conservation Division (OCD) has rejected the application, Application ID: 397923

Amber/Matt

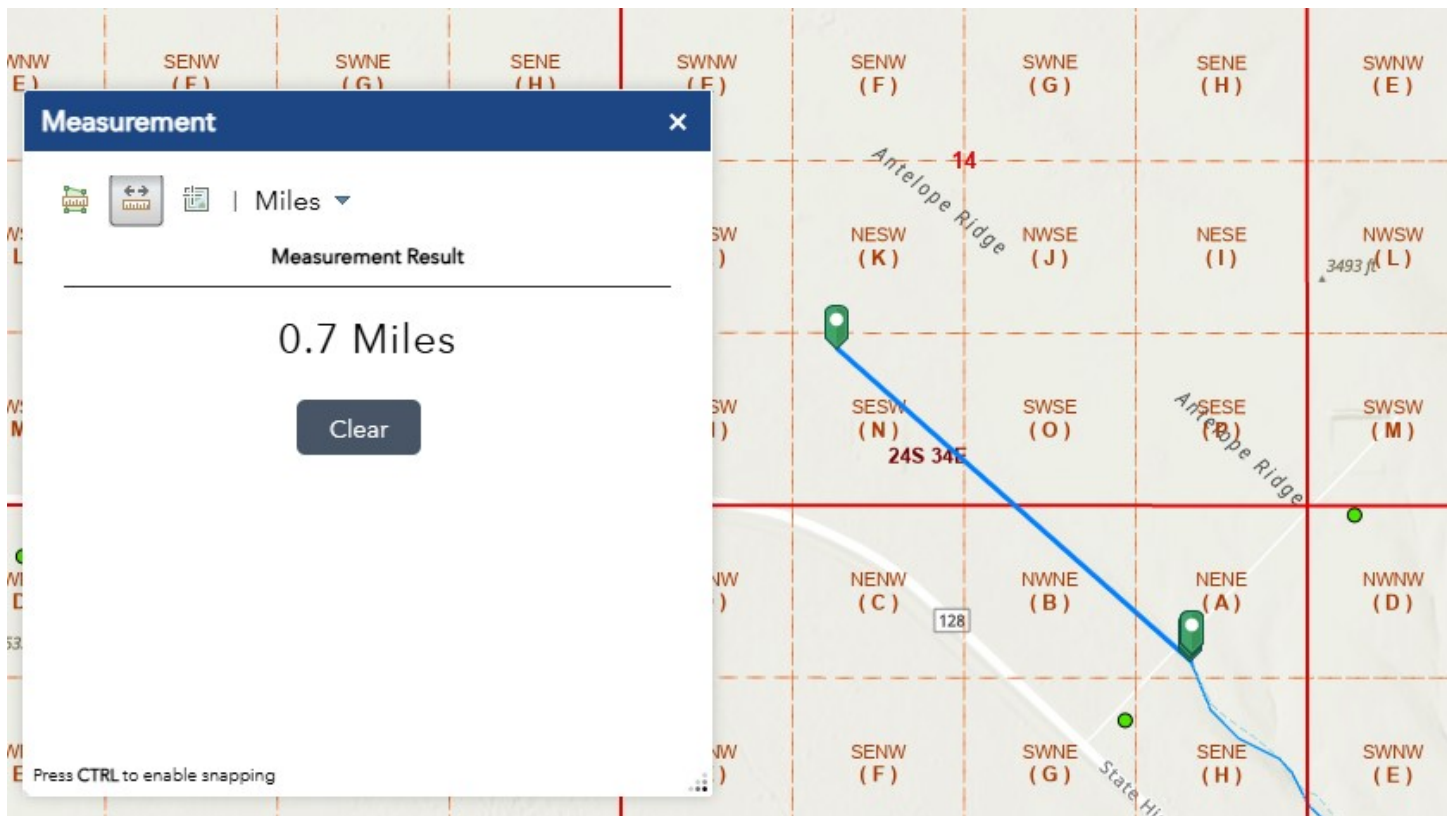
OCD directed Targa to complete the C-141 application for these releases per my email on Friday September 6, 2024.

“Targa can submit these releases through the C-141 process. It is very important that in the “Other Information Section” Targa identifies that this gas release does not meet the requirements of Part 27 or 28 NMAC. I would also reiterate that point in your executive summary. Each C-141 Packet should include all the information required in 19.15.29 NMAC (i.e site maps, pictures, executive summary, etc.). Additionally Targa will need to include variances to the requirements for collection of soil samples, and reclamation/revegetation.”

Releases under 19.15.29 NMAC are required to have a site characterization, a closure remediation report, a reclamation report, and a revegetation report. Releases of gas to atmosphere require the same reporting criteria as liquids released to the ground under 19.15.29 NMAC. The submitted reports did not meet the requirements of the rule. Siting criteria must be included in the reports and supported by maps and other documentation such as depth to groundwater data from OSE, USGS, ect. OCD uses this information to verify that the answers are answered correctly on the submitted C-141. Several of the submitted reports had incorrect data provided under the C-141 site characterization. For example, **NAPP2425544956 ROJO TORO PURGE #1 @ 0**, was answered the following way:

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

However, when OCD reviewed the site on the OCD map, it is clear that there are two water courses less than 5 miles away.



OCD reviewed the application and noted that there were no supporting documents for the siting criteria, executive summary's, scaled site maps, photos of the release area showing no liquids impacts (some had photos). Lastly, there were no written variance request per 19.15.29.14 NMAC and thus rejected the applications for not meeting the requirements of 19.15.29 NMAC.

Please review the rejection emails and resubmit the “**Revegetation reports**, with all of the required documents/attachments.” My recommendation would be to submit one report first and let OCD review it before submitting all 10 reports.

Thanks,

Cory Smith • Environmental Projects Supervisor
 Environmental Bureau
 EMNRD - Oil Conservation Division
 5200 Oakland Avenue N.E Suite 100 | Albuquerque, NM 87113
 505.419.2687 | Cory.Smith@emnrd.nm.gov
<http://www.emnrd.state.nm.us/OCD/>

From: Eales, Matt <meales@targaresources.com>

Sent: Thursday, November 14, 2024 10:46 AM

To: Groves, Amber L. <agroves@targaresources.com>; Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>; Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>; Reynolds, Sylwia A. <sreynolds@targaresources.com>

Subject: RE: [EXTERNAL] The Oil Conservation Division (OCD) has rejected the application, Application ID: 397923

Thank you, Amber.

Cory/Ashley – please know that we are happy to do whatever you feel is necessary to properly document the fact that these were just gas releases with no release to the ground. If we need to do sampling or whatever you feel helps you feel comfortable from a record-keeping standpoint, please just let us know.

Also, I will be at the Wendell Chino building Monday for a meeting from 12-1pm and can meet in-person before or after this at your convenience to help in our mutual understanding of expectations.

All the best,
Matt
832.496.7513

From: Groves, Amber L. <agroves@targaresources.com>

Sent: Thursday, November 14, 2024 11:18 AM

To: Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>; Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>; Eales, Matt <meales@targaresources.com>; Reynolds, Sylwia A. <sreynolds@targaresources.com>

Subject: FW: [EXTERNAL] The Oil Conservation Division (OCD) has rejected the application, Application ID: 397923

Good Morning, Cory,

I have a few questions regarding the denial of these ten events. These are the events in the attached correspondence and that you, Matt and I had a few meetings on as well. In the meetings and the attached, it was agreed upon that Targa would not be required to take samples and that photographs would suffice as there were no liquids released in any of the events. It was also agreed that we would need to put in for a variance for reclamation and revegetation. The variance request was submitted on the C-141 per your direction. The denial below is the same for all 10 events. Would you please advise on what Targa's next steps are to resolve these events? We would be happy to set up a call as well.

Thank you,

Amber



Amber Groves | Targa Resources | ES&H Staff Specialist
Cell: (575)635-9096 | agroves@targaresources.com

From: OCDOnline@state.nm.us <OCDOnline@state.nm.us>

Sent: Thursday, November 14, 2024 9:19 AM

To: Groves, Amber L. <agroves@targaresources.com>

Subject: [EXTERNAL] The Oil Conservation Division (OCD) has rejected the application, Application ID: 397923

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

To whom it may concern (c/o Amber Groves for Targa Northern Delaware, LLC.),

The OCD has rejected the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nAPP2425552081, for the following reasons:

- **Reclamation report denied.**
- **Submitted reclamation report does not meet the requirements of 19.15.29 NMAC.**
- **Although the release was gas, a site characterization must be conducted and accurately reflected on the C-141. Refer to 19.15.29.11 NMAC for the requirements of a site characterization. This information will need to be included in the submitted report.**
- **The submitted report must meet the reporting requirements listed in 19.15.29.12/13.**
- **Variance requests must be included in the report to as why sampling was not conducted, and to why reclamation and revegetation is not required.**
- **Submit a report via the OCD permitting portal by January 13, 2025.**

The rejected C-141 can be found in the OCD Online: Permitting - Action Status, under the Application ID: 397923. Please review and make the required correction(s) prior to resubmitting.

If you have any questions why this application was rejected or believe it was rejected in error, please contact me prior to submitting an additional C-141.

Thank you,

Ashley Maxwell

Projects Environmental Specialist - A

505-635-5000

Ashley.Maxwell@emnrd.nm.gov

New Mexico Energy, Minerals and Natural Resources Department

1220 South St. Francis Drive

Santa Fe, NM 87505

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APPENDIX B – DEPTH TO GROUNDWATER INFORMATION

Point of Diversion Summary

quarters are 1=NW 2=NE 3=SW 4=SE
quarters are smallest to largest

NAD83 UTM in meters

Well Tag	POD Nbr	Q64	Q16	Q4	Sec	TwS	Rng	X	Y	Map
	C 03943 POD1	NE	SE	NE	21	24S	34E	644522.6	3564266.6	

* UTM location was derived from PLSS - see Help

Driller License:	1737	Driller Company:	SHADE TREE DRILLING		
Driller Name:	JUSTIN MULLINS				
Drill Start Date:	2016-04-21	Drill Finish Date:	2016-04-24	Plug Date:	
Log File Date:	2016-04-25	PCW Rcv Date:		Source:	Shallow
Pump Type:		Pipe Discharge Size:		Estimated Yield:	5
Casing Size:	6.00	Depth Well:	610	Depth Water:	431

Water Bearing Stratifications:

Top	Bottom	Description
39	431	Sandstone/Gravel/Conglomerate

Casing Perforations:

Top	Bottom
420	480

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.



WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

www.ose.state.nm.us

1. GENERAL AND WELL LOCATION	OSE POD NUMBER (WELL NUMBER) C-3943				OSE FILE NUMBER(S) C-3943			
	WELL OWNER NAME(S) Bert Madera				PHONE (OPTIONAL) 575-631-4444			
	WELL OWNER MAILING ADDRESS 1108 W. Pierce				CITY carlsbad		STATE nm	
					ZIP 88220			
	WELL LOCATION (FROM GPS)		DEGREES 32		MINUTES 12		SECONDS 20.5	
		LATITUDE				N		
		LONGITUDE				W		
* ACCURACY REQUIRED: ONE TENTH OF A SECOND								
* DATUM REQUIRED: WGS 84								
DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS - PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE SE 1/4 OF NE 1/4 OF SE 1/4 OF NE 1/4 Of Section 21, T24S, R34E								
2. DRILLING & CASING INFORMATION	LICENSE NUMBER WD-1737		NAME OF LICENSED DRILLER Justin Mullins			NAME OF WELL DRILLING COMPANY WRR		
	DRILLING STARTED 4-21-16		DRILLING ENDED 4-24-16		DEPTH OF COMPLETED WELL (FT) 610'		BORE HOLE DEPTH (FT) 610	
					DEPTH WATER FIRST ENCOUNTERED (FT) 431'			
	COMPLETED WELL IS:		☐ ARTESIAN		☐ DRY HOLE		☒ SHALLOW (UNCONFINED)	
	DRILLING FLUID:		☒ AIR		☐ MUD		ADDITIVES - SPECIFY:	
	DRILLING METHOD:		☒ ROTARY		☐ HAMMER		☐ CABLE TOOL	
							OTHER - SPECIFY:	
	DEPTH (feet bgl)		BORE HOLE DIAM (inches)		CASING MATERIAL AND/OR GRADE (include each casing string, and note sections of screen)		CASING CONNECTION TYPE	
	FROM	TO						
	0	40'	14 3/4"		12" steal		weld	
40	420	11"		6" steal		weld		
420'	480'	11"		6" steal		weld		
480'	610	11"		6" steal		weld		
3. ANNULAR MATERIAL	DEPTH (feet bgl)		BORE HOLE DIAM. (inches)		LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL		AMOUNT (cubic feet)	
	FROM	TO						
	0'	40'	14 3/4"		portland cement		13.38'	
	20'	610'	11"		1/2" gravel		253.5'	
	0'	20'	11"		portland cement		11.1'	

FOR OSE INTERNAL USE

WR-20 WELL RECORD & LOG (Version 06/08/2012)

FILE NUMBER	C-3943	POD NUMBER	1	TRN NUMBER	585607
LOCATION	24S.34E.21.2.4.2	EXPL		PAGE 1 OF 2	

4. HYDROGEOLOGIC LOG OF WELL

5. TEST; RIG SUPERVISION

6. SIGNATURE

FOR OSE INTERNAL USE		WR-20 WELL RECORD & LOG (Version 06/08/2012)	
FILE NUMBER	C-3943	POD NUMBER	1
LOCATION	24S.34E.21-2.4.2	TRN NUMBER	585607
		EXP?	PAGE 2 OF 2

Point of Diversion Summary

quarters are 1=NW 2=NE 3=SW 4=SE
quarters are smallest to largest

NAD83 UTM in meters

Well Tag	POD Nbr	Q64	Q16	Q4	Sec	Tws	Rng	X	Y	Map
NA	C 04682	SE	SE	NE	25	24S	34E	649348.6	3562621.8	

* UTM location was derived from PLSS - see Help

Driller License:	1058	Driller Company:	KEY'S DRILLING & PUMP SERVICE		
Driller Name:	GARY KEY				
Drill Start Date:	2022-12-20	Drill Finish Date:	2023-01-18	Plug Date:	2023-01-18
Log File Date:	2023-02-08	PCW Rcv Date:		Source:	Shallow
Pump Type:		Pipe Discharge Size:		Estimated Yield:	3
Casing Size:	4.50	Depth Well:	290	Depth Water:	180

Water Bearing Stratifications:

Top	Bottom	Description
157	270	Sandstone/Gravel/Conglomerate

Casing Perforations:

Top	Bottom
160	290

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.



WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

www.ose.state.nm.us

1. GENERAL AND WELL LOCATION	OSE POD NO. (WELL NO.) C04682 POD 1		WELL TAG ID NO. 211EC		OSE FILE NO(S). C-04682		
	WELL OWNER NAME(S) Daniel Baeza				PHONE (OPTIONAL) 575-390-2569		
	WELL OWNER MAILING ADDRESS 7225 Mockingbird Lane				CITY Hobbs	STATE NM	ZIP 88240
	WELL LOCATION (FROM GPS)	DEGREES LATITUDE 32	MINUTES 11	SECONDS 24.83242 N	* ACCURACY REQUIRED: ONE TENTH OF A SECOND * DATUM REQUIRED: WGS 84		
DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS - PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE							

2. DRILLING & CASING INFORMATION	LICENSE NO. WD1058		NAME OF LICENSED DRILLER GARY KEY		NAME OF WELL DRILLING COMPANY KEY'S DRILLING & PUMP SERVICE, INC			
	DRILLING STARTED 12/20/2022	DRILLING ENDED 01/19/2023	DEPTH OF COMPLETED WELL (FT) 290	BORE HOLE DEPTH (FT) 920	DEPTH WATER FIRST ENCOUNTERED (FT) 180			
	COMPLETED WELL IS: ☐ ARTESIAN *add ☐ DRY HOLE ☒ SHALLOW (UNCONFINED) Centralizer info below				STATIC WATER LEVEL IN COMPLETED WELL (FT) 165FT	DATE STATIC MEASURED 1-19-2023		
	DRILLING FLUID: ☒ AIR ☐ MUD ADDITIVES - SPECIFY:							
	DRILLING METHOD: ☒ ROTARY ☐ HAMMER ☐ CABLE TOOL ☐ OTHER - SPECIFY:				CHECK HERE IF PITLESS ADAPTER IS INSTALLED ☐			
	DEPTH (feet bgl)		BORE HOLE DIAM (inches)	CASING MATERIAL AND/OR GRADE (include each casing string, and note sections of screen)	CASING CONNECTION TYPE (add coupling diameter)	CASING INSIDE DIAM. (inches)	CASING WALL THICKNESS (inches)	SLOT SIZE (inches)
	FROM	TO						
	0	20	16-3/4"	12" STEEL		12"	.250	
	-2	160	9-7/8"	PVC SCH40	SPLINE	4-1/2"	SCH40	
	160	290	9-7/8"	PVC SCH40	SPLINE	4-1/2"	SCH40	.032

3. ANNULAR MATERIAL	DEPTH (feet bgl)		BORE HOLE DIAM. (inches)	LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL <i>*(if using Centralizers for Artesian wells- indicate the spacing below)</i>	AMOUNT (cubic feet)	METHOD OF PLACEMENT
	FROM	TO				
	0	20	16-3/4"	CEMENT SLURRY	13.09	POUR
	0	62	9-7/8"	HYDRATED BENTONITE CHIPS	22.35	TREMIE
	62	114	9-7/8"	PEA GRAVEL	21.26	POUR
	114	290	9-7/8"	8/16 SILICA SAND	71.98	TREMIE

OSE DTI FEB 5 2023 14:02

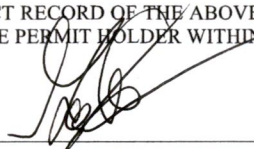
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WR-20 WELL RECORD & LOG (Version 09/22/2022)

FILE NO. C-4682-POD 1	POD NO. 1	TRN NO. 738374
LOCATION Dom+STK 24.34.25.442	WELL TAG ID NO. 211EC	PAGE 1 OF 2

4. HYDROGEOLOGIC LOG OF WELL	DEPTH (feet bgl)		THICKNESS (feet)	COLOR AND TYPE OF MATERIAL ENCOUNTERED - INCLUDE WATER-BEARING CAVITIES OR FRACTURE ZONES (attach supplemental sheets to fully describe all units)	WATER BEARING? (YES / NO)	ESTIMATED YIELD FOR WATER- BEARING ZONES (gpm)
	FROM	TO				
	0	5	5	RED SAND	Y ✓ N	
	5	23	18	CALICHE	Y ✓ N	
	23	118	95	RED SANDSTONE AND CLAY	Y ✓ N	
	118	157	39	BROWN & RED SANDSTONE	Y ✓ N	
	157	270	113	RED CLAY & SANDSTONE	✓ Y N	3.00
	270	290	20	TAN SANDSTONE	Y ✓ N	
	290	324	34	RED CLAY	Y ✓ N	
	324	410	86	RED CLAY WITH SANDSTONE STREAKS	Y ✓ N	
	410	905	495	RED & GRAY SPECKLED SANDSTONE/MUDSTONE	Y ✓ N	
	905	920	15	DOLOMITE-RUSTLER FORMATION	Y ✓ N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
METHOD USED TO ESTIMATE YIELD OF WATER-BEARING STRATA: ☒ PUMP ☐ AIR LIFT ☐ BAILER ☐ OTHER - SPECIFY:					TOTAL ESTIMATED WELL YIELD (gpm): 3	

5. TEST; RIG SUPERVISION	WELL TEST	TEST RESULTS - ATTACH A COPY OF DATA COLLECTED DURING WELL TESTING, INCLUDING DISCHARGE METHOD, START TIME, END TIME, AND A TABLE SHOWING DISCHARGE AND DRAWDOWN OVER THE TESTING PERIOD.
	MISCELLANEOUS INFORMATION: THIS WELL WAS DRILLED TO 920 AND PLUGGED BACK TO 290FT UNDER WELL PLUGGING PLAN OF OPERATIONS DATED 1-9-2023. THE WELL THEN WAS COMPLETED AS A DOMESTIC WELL.	
	PRINT NAME(S) OF DRILL RIG SUPERVISOR(S) THAT PROVIDED ONSITE SUPERVISION OF WELL CONSTRUCTION OTHER THAN LICENSEE: CASEY KEY	

6. SIGNATURE	THE UNDERSIGNED HEREBY CERTIFIES THAT, TO THE BEST OF HIS OR HER KNOWLEDGE AND BELIEF, THE FOREGOING IS A TRUE AND CORRECT RECORD OF THE ABOVE DESCRIBED HOLE AND THAT HE OR SHE WILL FILE THIS WELL RECORD WITH THE STATE ENGINEER AND THE PERMIT HOLDER WITHIN 30 DAYS AFTER COMPLETION OF WELL DRILLING:	
	 GARY KEY SIGNATURE OF DRILLER / PRINT SIGNEE NAME	2/8/2023 DATE

FOR OSE INTERNAL USE

WR-20 WELL RECORD & LOG (Version 09/22/2022)

FILE NO. C-4682-POD 1	POD NO. 1	TRN NO. 738374
WELL TAG ID NO. 211EC	PAGE 2 OF 2	

APPENDIX C – PHOTOGRAPHIC LOG

Rojo Toro Photo Documentation



Photo of Purge Point facing North



Photo of Purge Point facing North

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 413884

QUESTIONS

Operator: Targa Northern Delaware, LLC. 110 W. 7th Street, Suite 2300 Tulsa, OK 74119	OGRID: 331548
	Action Number: 413884
	Action Type: [C-141] Revegetation Report C-141 (C-141-v-Revegetation)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2425552690
Incident Name	NAPP2425552690 ROJO TORO PURGE #7 @ 0
Incident Type	Natural Gas Release
Incident Status	Re-vegetation Report Received
Incident Facility	[fAPP2123031392] TARGA NORTHERN DELAWARE, LLC.

Location of Release Source	
Please answer all the questions in this group.	
Site Name	ROJO TORO PURGE #7
Date Release Discovered	02/16/2024
Surface Owner	Private

Incident Details	
Please answer all the questions in this group.	
Incident Type	Natural Gas Release
Did this release result in a fire or is the result of a fire	No
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	Cause: Other Pipeline (Any) Natural Gas Vented Released: 20,422 MCF Recovered: 0 MCF Lost: 20,422 MCF.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	This event does not meet the requirements of Part 27 or Part 28 NMAC.

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

General Information
Phone: (505) 629-6116

Online Phone Directory
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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 2

Action 413884

QUESTIONS (continued)

Operator: Targa Northern Delaware, LLC. 110 W. 7th Street, Suite 2300 Tulsa, OK 74119	OGRID: 331548
	Action Number: 413884
	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)	Yes, according to supplied volumes this appears to be 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: (3) an unauthorized release of gases exceeding 500 MCF.
<i>With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.</i>	

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	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.

Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.

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.

I hereby agree and sign off to the above statement	Name: Amber Groves Title: Environmental Specialist Email: agroves@targaresources.com Date: 12/19/2024
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QUESTIONS, Page 3

Action 413884

QUESTIONS (continued)

Operator: Targa Northern Delaware, LLC. 110 W. 7th Street, Suite 2300 Tulsa, OK 74119	OGRID: 331548
	Action Number: 413884
	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 and 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)	Greater than 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1 and 5 (mi.)
Any other fresh water well or spring	Between 1 and 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1 and 5 (mi.)
A subsurface mine	Between 1 and 5 (mi.)
An (non-karst) unstable area	Greater than 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
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
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 milligrams 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 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.

On what estimated date will the remediation commence	02/16/2024
On what date will (or did) the final sampling or liner inspection occur	02/16/2024
On what date will (or was) the remediation complete(d)	02/16/2024
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 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 413884

QUESTIONS (continued)

Operator: Targa Northern Delaware, LLC. 110 W. 7th Street, Suite 2300 Tulsa, OK 74119	OGRID: 331548
	Action Number: 413884
	Action Type: [C-141] Revegetation Report C-141 (C-141-v-Revegetation)

QUESTIONS

Remediation Plan (continued)	
<i>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.</i>	
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.)	Not answered.
(Ex Situ) Excavation and on-site remediation (i.e. On-Site Land Farms)	Not answered.
(In Situ) Soil Vapor Extraction	Not answered.
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	Not answered.
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	Not answered.
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	Not answered.
Ground Water Abatement pursuant to 19.15.30 NMAC	Not answered.
OTHER (Non-listed remedial process)	Yes
Other Non-listed Remedial Process. Please specify	This was an above ground residue gas only event with no liquids released. There was no impact to soil. As such, Targa is respectfully requesting a variance to remediation requirements.
<i>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>	
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.	
I hereby agree and sign off to the above statement	Name: Amber Groves Title: Environmental Specialist Email: agroves@targaresources.com Date: 12/19/2024
<i>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.</i>	

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QUESTIONS, Page 5

Action 413884

QUESTIONS (continued)

Operator: Targa Northern Delaware, LLC. 110 W. 7th Street, Suite 2300 Tulsa, OK 74119	OGRID: 331548
	Action Number: 413884
	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

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QUESTIONS, Page 6

Action 413884

QUESTIONS (continued)

Operator: Targa Northern Delaware, LLC. 110 W. 7th Street, Suite 2300 Tulsa, OK 74119	OGRID: 331548
	Action Number: 413884
	Action Type: [C-141] Revegetation Report C-141 (C-141-v-Revegetation)

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	391579
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	10/14/2024
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
Have the lateral and vertical extents of contamination been fully delineated	Yes
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)	This was an above ground residue gas only purge event with no liquids released. Targa is respectfully requesting a variance to remediation and sampling due to no soil impact.

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.

I hereby agree and sign off to the above statement	Name: Amber Groves Title: Environmental Specialist Email: agroves@targaresources.com Date: 12/19/2024
--	--

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QUESTIONS, Page 7

Action 413884

QUESTIONS (continued)

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	Action Number: 413884
	Action Type: [C-141] Revegetation Report C-141 (C-141-v-Revegetation)

QUESTIONS

Reclamation Report	
<i>Only answer the questions in this group if all reclamation steps have been completed.</i>	
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
<i>Per Paragraph (1) of Subsection D of 19.15.29.13 NMAC the reclamation must contain a minimum of four feet of non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, or other test methods approved by the division. The soil cover must include a top layer, which is either the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater.</i>	
Is the soil top layer complete and is it suitable material to establish vegetation	Yes
On what (estimated) date will (or was) the reseeded commence(d)	01/01/2050
Summarize any additional reclamation activities not included by answers (above)	This event occurred in an active facility constructed on a caliche pad. Targa has no known plans to deconstruct the pad. Targa is respectfully requesting a variance to remediation, reclamation and revegetation due to no impact to soil and current use of the facility.
<i>The responsible party must attach information demonstrating they have complied with all applicable reclamation requirements and any conditions or directives of the OCD. This demonstration should be in the form of attachments (in .pdf format) including a scaled site map, any proposed reseeded plans or relevant field notes, photographs of reclaimed area, and a narrative of the reclamation activities. Refer to 19.15.29.13 NMAC.</i>	
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: Amber Groves Title: Environmental Specialist Email: agroves@targaresources.com Date: 12/19/2024

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QUESTIONS, Page 8

Action 413884

QUESTIONS (continued)

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	Action Number: 413884
	Action Type: [C-141] Revegetation Report C-141 (C-141-v-Revegetation)

QUESTIONS

Revegetation Report	
<i>Only answer the questions in this group if all surface restoration, reclamation and re-vegetation obligations have been satisfied.</i>	
Requesting a restoration complete approval with this submission	Yes
What was the total revegetation surface area (in square feet) for this site	0
<i>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.</i>	
On what date did the reseeded commence	12/19/2024
On what date was the vegetative cover inspected	12/19/2024
What was the life form ratio compared to pre-disturbance levels	60
What was the total percent plant cover compared to pre-disturbance levels	80
Summarize any additional revegetation activities not included by answers (above)	This event occurred in an active facility constructed on a caliche pad. Targa has no known plans to deconstruct the facility. As such, Targa is respectfully requesting a variance to revegetation requirements due to current use and infeasibility.
<i>The responsible party must attach information demonstrating they have complied with all applicable re-vegetation requirements and any conditions or directives of the OCD. 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 re-vegetation activities. Refer to 19.15.29.13 NMAC.</i>	
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: Amber Groves Title: Environmental Specialist Email: agroves@targaresources.com Date: 12/19/2024
<i>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.</i>	

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CONDITIONS

Action 413884

CONDITIONS

Operator: Targa Northern Delaware, LLC. 110 W. 7th Street, Suite 2300 Tulsa, OK 74119	OGRID: 331548
	Action Number: 413884
	Action Type: [C-141] Revegetation Report C-141 (C-141-v-Revegetation)

CONDITIONS

Created By	Condition	Condition Date
amaxwell	The revegetation report has been approved pursuant to 19.15.29.13 E. NMAC. The acceptance of this 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; or if the location fails to revegetate properly. In addition, the OCD approval does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.	12/19/2024