GW - 344

GENERAL CORRESPONDENCE

YEAR(S): 2007 - Present

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Thursday, July 30, 2009 11:25 AM
To: 'Wrangham, Calvin W.'
Cc: Johnson, Larry, EMNRD; Leking, Geoffrey R, EMNRD
Subject: RE: South Eunice GW-344 Sump Closure Request

Mr. Wrangham,

Good afternoon,

Thank you for your submittal of the removal of the TWO Below-Grade tanks located between Compressors # 30 & # 31 at the Eunice South Compressor Station.

The OCD approves the submitted plan for BGT removal per the following conditions.

The design of the replacement BGT is approved.

- OCD request a schematic of where this new tank will be located.
- OCD request that photographs be taken during the installation of this tank and when completed.
- OCD *recommends* that a back ground soil sample be taken prior to the pouring of the concrete. This may be used for future references that will benefit Targa

Removal of the two below-grade tanks.

- OCD request that photographs be taken during the removal process of these tanks.
- OCD request a schematic of locations where soil samples were taken.
- Where does Targa intend to dispose of the removed tanks?

Submit a final report to the OCD once all work is done pertaining to these tanks. Notify OCD upon new findings during this work.

Notify the Hobbs OCD office, Larry Johnson or Geoffrey Leking, Environmental representatives when the Below-grade tanks are about to be removed. They may want to witness.

I will be waiting on the above information.

Thank you for your attention.

llowe

Leonard Lowe
Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505
Office: 505-476-3492
Fax: 505-476-3462
E-mail: leonard.lowe@state.nm.us
Website: http://www.emnrd.state.nm.us/ocd/

From: Wrangham, Calvin W. [mailto:CWrangham@targaresources.com]
Sent: Monday, July 20, 2009 3:11 PM
To: Lowe, Leonard, EMNRD

Cc: Lingnau, James A.; Keiser, Jessica; Woodell, Rebecca F; Ninan, Susan V.; Embrey, Donald M
Subject: South Eunice GW-344 Sump Closure Request

Mr. Lowe, per our conversation find attached the BGT closure information. A hard copy is in the mail to yourself and Mr. von Gonten. Please respond as soon as possible. Targa has crews working at the site and is ready to begin BGT secondary containment construction.

Thanks, Cal Wrangham.

TARGA

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

July 20, 2009

Mr. Glenn von Gonten
Acting Environmental Bureau Chief
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Inspection Report – GW-344
Versado Gas Processors LLC
Eunice South Compressor Station
Lea County, New Mexico

Dear Mr. von Gonten:

Releases from the Compressor Buildings #30 and #31 below-grade tanks (BGTs) were identified during the Oil Conservation Division (OCD) inspection of the Targa Resources LLP (Targa) Eunice South Compressor Station (GW-344) on April 21, 2009. This facility is located in Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico. A *Release Notification and Corrective Action* form C-141 is attached that describes the nature and known details of the release. Floor drains and piping from the compressor building convey liquids (i.e. condensate, produced water and engine oils) to the BGTs.

As indicated in Targa's inspection response dated June 30, 2009, Targa will permanently close the two existing BGTs (#30 and #31 Compressor). Targa requests approval for the installation of a single BGT permitted and constructed in compliance with NMAC §19.15.17 *et seq.* to accept the fluids from the compressor buildings.

The proposed closure of the current BGTs includes excavating impacted soil and disposal at an OCD-approved facility listed in the GW-344 permit, confirmation soil sampling, and site reclamation. Because the two BGTs are located beneath an overhead pipe-rack, excavation is being performed by hand-digging around the tanks until removal can be accomplished. A minimum of one five-part confirmation sample will be collected from the perimeter and beneath each tank. These sample aliquots will be submitted for benzene, toluene, ethylbenzene, and total-xylenes (BTEX), total petroleum hydrocarbons (TPH), and chlorides using OCD-approved laboratory analytical methodologies.

Excavated soils will be disposed using an OCD-approved facility listed in the GW-344 permit; most likely the Sundance Services, Inc. facility (Order/Permit No. R-6940/711-01-0003). Clean fill soil will be returned to the excavation. The surface will be matched to the existing grade. The site will not be proposed to be reseeded since it is within an active natural gas compressor station, and could be a hazard for fires and operations personnel.

Targa requests approval to install a single replacement BGT. The replacement BGT is an approximate 1,350 gallon steel tank currently used as a transfer tank receiving liquids from the two aforementioned tanks. This BGT tank will be emptied of liquids, removed from its service location, tested to ensure the tank walls are not degraded, repainted, and then placed in a concrete secondary containment. The concrete containment will be 8' wide by 8' deep and 19' long, with 9½-inch thick rebar reinforced walls. The top of the secondary containment will extend approximately one-foot above the ground surface. A single inlet will be installed on the north wall approximately 4½-feet from the west corner,

and approximately two feet bgs. The inlet piping will be a 4-inch diameter buried poly-flowline that will operate under gravity pressure. Fluids within the tank will be monitored by a level sensor which will trip a top mounted pump, raising the fluid into overhead steel piping where it will be commingled with scrubber liquids and ultimately discharged into a disposal well. The replacement tank's secondary containment has an approximately capacity of 9,100 gallons, exceeding the 1.33-times volume requirement. A final as-built drawing will be incorporated into GW-344 Discharge Permit renewal.

According to the NM State Engineer's Office iWATERS database, the average depth to groundwater is 57 feet below ground surface (bgs) for an approximate one-mile radius of the facility; however the GW-003 groundwater investigation indicates the depth to groundwater in the vicinity of the facility is between 50 and 55 feet bgs. Because the replacement tank's bottom may be less than 50 feet to the top of the aquifer, Targa would like a variance from the requirements in NMAC §19.15.17.10(1)(a).

The nearest watercourse, the ephemeral Monument Draw is greater than a mile from the facility. The site is not within 500 feet of a wetland, does not overlie a suburface mine, is not within an unstable area, nor is it within a 100-year floodplain. The nearest off-facility building or well is more than 500 feet from the facility.

Please contact me at (432) 425-7072 or by email at cwrangham@targaresources.com , or James Lingnau, Eunice area Manager at (575) 394-2534 ext 226 or by email at jlingnau@targaresources.com if you have any questions or require additional information. Thank You.

Sincerely,
Targa Midstream Services Limited Partnership

Cal Wrangham
ES&H Manager

Attachments

Cc: Mr. Leonard Lowe, OCD
Mr. Larry Johnson, Environmental Engineer, District I Hobbs
Ms. Rebecca Woodell, Targa – Eunice Compliance Technician
Mr. James Lingnau, Targa – Eunice Area Manager
Ms. Jessica L. Keiser, Targa – Assistant VP ES&H

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

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

Form C-141
Revised October 10, 2003

Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company - Targa Midstream Services, L.P.	Contact - Cal Wrangham
Address - P.O. Box 1909, Eunice, NM 88231	Telephone No. - 432.688.0542
Facility Name - Eunice South Compressor Station	Facility Type - Gas Compressor Station

Surface Owner - Versado Gas Processors, LLC	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
M	27	22 South	37 East					Lea

Latitude N 32.362832° **Longitude** W-103.159165°

NATURE OF RELEASE

Type of Release - produced water and condensate	Volume of Release - unknown	Volume Recovered – N/A
Source of Release - floor drain from #30 and #31 compressor buildings	Date and Hour of Occurrence April 21, 2009	Date and Hour of Discovery April 21, 2009
Was Immediate Notice Given? ☐ Yes ☒ No ☐ Not Required	If YES, To Whom? Discovered during OCD Inspection	
By Whom? Mr. Leonard Lowe	Date and Hour April 21, 2009	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse. Not Applicable	

If a Watercourse was Impacted, Describe Fully.*
Not Applicable

Describe Cause of Problem and Remedial Action Taken.*
Release most likely from overflow of sumps accepting liquid via floor drain lines and scrubber liquids from the compressor buildings #30 and #31, to two 620-gallon capacity below-grade tanks (sumps) associated with each compressor.

Describe Area Affected and Cleanup Action Taken.*
The impacted areas are located below tanks which are under process lines. Impacted soil is being excavated by hand. Investigation will be performed to assess releases and soil samples will be collected for the appropriate laboratory chemical analyses.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD 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 NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD 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.

Signature:	OIL CONSERVATION DIVISION	
Printed Name: Cal Wrangham	Approved by District Supervisor:	
Title: Environmental, Safety and Health Manager	Approval Date:	Expiration Date:
E-mail Address: cwrangham@targaresources.com	Conditions of Approval:	Attached ☐
Date: 1-30-09 Phone: 432 6880542		

* Attach Additional Sheets If Necessary

Lowe, Leonard, EMNRD

From: Wrangham, Calvin W. [CWrangham@targaresources.com]
Sent: Tuesday, July 28, 2009 2:19 PM
To: Lowe, Leonard, EMNRD
Subject: FW: South Eunice Tank GW-344
Attachments: South Eunice Below Grade Tank.jpg

Leonard, per our phone conversation the attachment is a sketch of the BGT we are planning to install at South Eunice Compressor Station. This will be installed near the two compressor buildings. Installing this tank allows us to remove the two sumps that are currently near there and causing soil contamination.

The top is open so the operations people can visually check for any leaks from the tank on a daily basis. The secondary containment is 10" thick concrete.

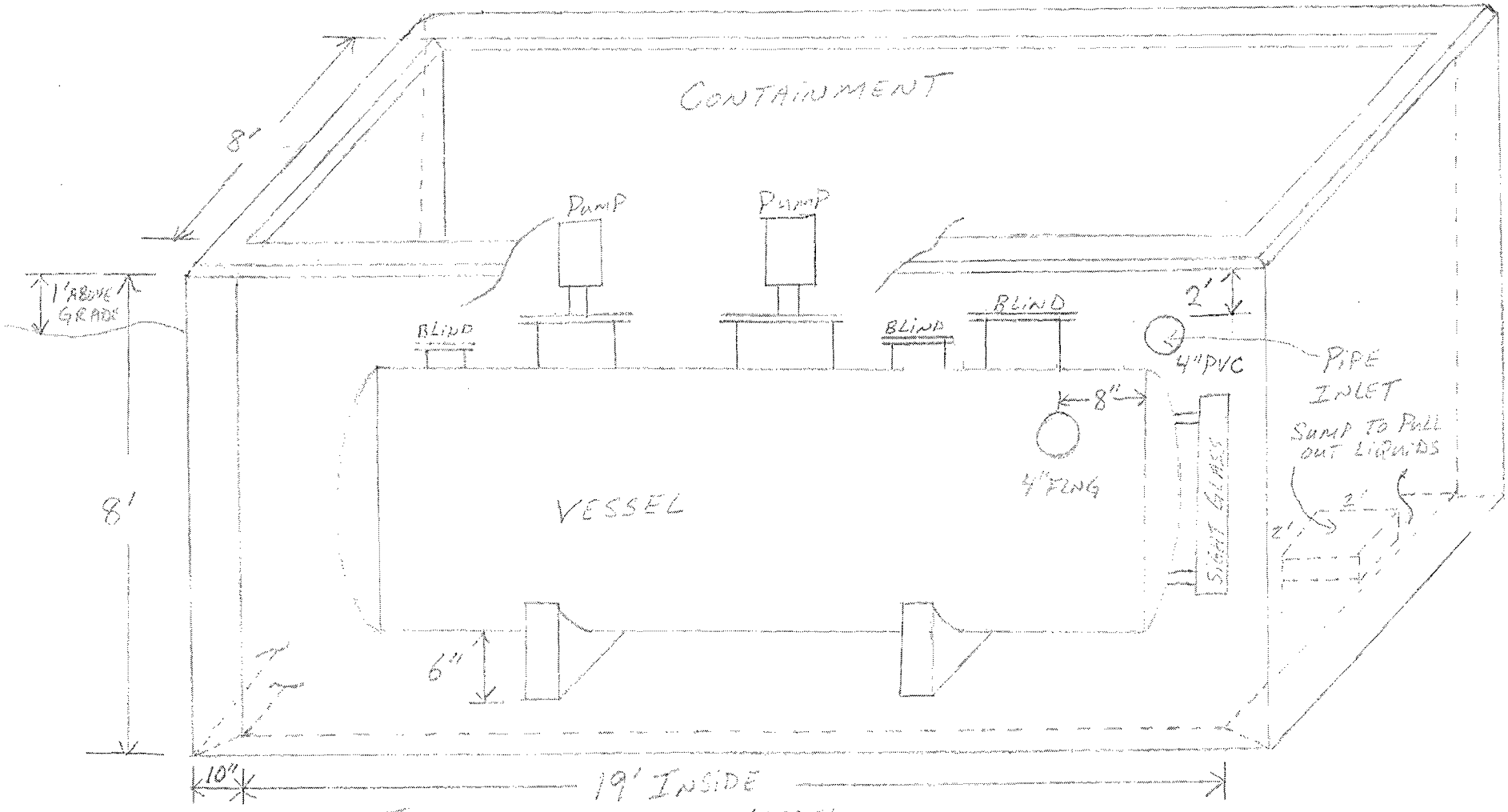
If this design meets criteria please respond as soon as possible, as we have crews on site waiting to begin pouring the concrete containment.

Thanks, Cal.

From: Lingnau, James A.
Sent: Tuesday, July 28, 2009 2:59 PM
To: Wrangham, Calvin W.
Cc: Woodell, Rebecca F
Subject: South Eunice Tank

See attached.

PROPOSED BELOW GRADE TANK
SOUTH EUNICE BOOSTER



SUMP CONTAINMENT

- 19' X 8' X 8'
- REBAR REINFORCED CEMENT
- 10" THICK WALLS
- 4" THICK FLOOR

VESSEL

- 48" X 14.5'
- MAWP 25 PSIG
- 1/4" THICK WALL

Chavez, Carl J, EMNRD

From: Wrangham, Calvin W. [CWrangham@targaresources.com]
Sent: Monday, June 23, 2008 6:33 AM
To: Chavez, Carl J, EMNRD
Cc: Woodell, Rebecca F; Lingnau, James A.
Subject: RE: Targa South Plant Inspection Photos

Carl, Yes Permian Demolition Services, Inc. out of Odessa is taking down the old plant processing equipment. They have an asbestos trained and qualified employee handling that end of the work. The oil staining you are referring to is under the old turbine building area. There is also staining south of the old engine room. These are not from recent spills but have been there from the Texaco operations prior to plant shutdown in 2000. Targa will do an investigation on these and the entire plant site after the concrete footings and buildings have been removed for easier access. OCD will be notified and the areas will be remediated on site.

Thanks, Cal.

From: Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]
Sent: Thursday, June 19, 2008 5:28 PM
To: Wrangham, Calvin W.
Cc: Price, Wayne, EMNRD
Subject: FW: Targa South Plant Inspection Photos

Cal:

Hi. While I was visiting the Targa South Plant on 6/17/2008 south of Eunice, I noticed what appeared to be major oil or diesel fuel staining beneath the old compressor building where Targa is currently decommissioning part of the facility.

This location needs to be investigated and cleaned up. Also, there appears to be significant demolition on-going at the facility. While I noticed a sign warning about asbestos, the NMOCD wants to make sure Targa is in contact with NESHAP and has taken all precautions to protect public health and the environment based on the demolition and presence of asbestos containing materials on site.

Please reply to this message and let the NMOCD know what Targa plans to do there. Thank you.

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3491
Fax: (505) 476-3462
E-mail: CarlJ.Chavez@state.nm.us
Website: http://www.emnrd.state.nm.us/ocd/index.htm
(Pollution Prevention Guidance is under "Publications")

From: Price, Wayne, EMNRD
Sent: Thursday, June 19, 2008 2:25 PM
To: Chavez, Carl J, EMNRD
Subject: RE: Targa South Plant Photos

Make sure you have them investigate and clean up

From: Chavez, Carl J, EMNRD
Sent: Thursday, June 19, 2008 2:18 PM
To: Price, Wayne, EMNRD
Subject: Targa South Plant Photos

Wayne:

While going to the South Plant to witness the Skelly #4 PA (later cancelled), Targa appears to be demolishing part of the facility (see photos). I noticed that below the compressor units there is heavy staining of what appears to be oil or diesel fuel.

Let me know what you think? Thnx.

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3491
Fax: (505) 476-3462
E-mail: CarlJ.Chavez@state.nm.us
Website: http://www.emnrd.state.nm.us/ocd/index.htm
(Pollution Prevention Guidance is under "Publications")

TARGA

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

July 16, 2007

Mr. Wayne Price
Bureau Chief
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Additional Information Relevant to Case 13865
Application for a Permit to Drill and Operate an Injection Well
Targa Midstream Services Limited Partnership
South Eunice Compressor Station, Lea County, New Mexico

Dear Mr. Price:

Targa Midstream Services Limited Partnership (Targa) would like to provide the Bureau with additional information regarding the proposed Acid Gas Injection (AGI) Well site. This information is in addition to the information submitted to the Bureau by Mr. Alberto Gutierrez in his letter to Mr. William Jones dated June 5, 2007 (attached for your convenience). This additional information relates to a sonar survey to identify the cavern size and cavern location for Skelly #4 Y-Grade Product Storage Well to demonstrate there is no potential for impact to the proposed AGI well.

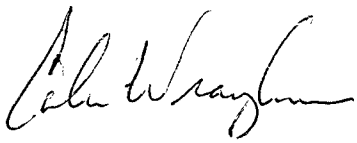
Targa hired Gray Wireline, 2400 E. I-20, Odessa, TX. 79766 to do gauge and density surveys on the #4 well. Mr. Monty Holmes of Gray Wireleine did the surveys on July 9, 2007. These gauge run survey identified the well tubing was 7.0 inch OD and was clear of any obstructions. The gauge run survey also determined the bottom of the casing and well depth at 2038 feet. The density run indicated the brine water level at 50 feet below the well head and that there is no product or pockets of product in the well. These surveys were conducted to gather the information needed to prepare for a well sonar survey. Find enclosed the density and CCL strip chart report.

On July 12, 2007 Gray Wireline returned with Sonarwire, Inc. of Abita Springs, LA. 70420, to conduct a sonar survey. The survey was witnessed by Mr. Leonard Lowe of the NMOCD, Santa Fe and myself. The sonar indicated a circular cavern with a maximum radius of 61.6 feet. See enclosed documents titled Max Range vs Bearing, Vertical Cross Section (north to south), and Vertical Cross Section (east to west).

The survey identifies the cavern radius to be approximately 20 yards in the direction of the proposed AGI drill site. The horizontal distance separating the #4 well and the proposed AGI well site is approximately 170 yards. With the approximately 150 yards horizontal distance separating these borings Targa feels there is no potential impact from #4 well on the proposed drilling location.

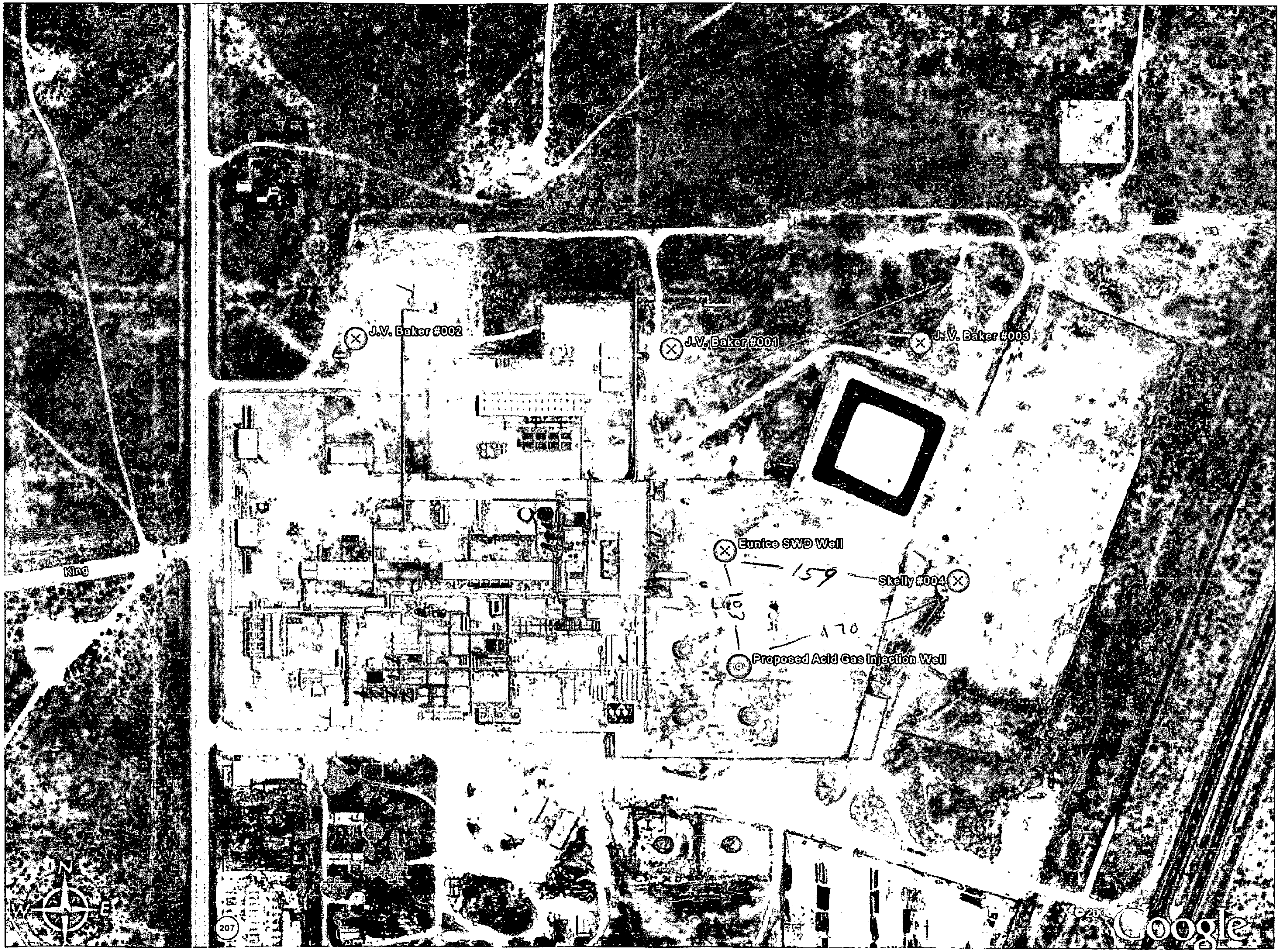
Please contact me at 432.688.0542 if you have questions.

Sincerely,



Cal Wrangham
Targa Midstream Services
Sr. ES&H Specialist

cc: Chris Williams – NMOCD Hobbs
Jessica Keiser – Targa ES&H Manager
William Carr, Holland & Hart

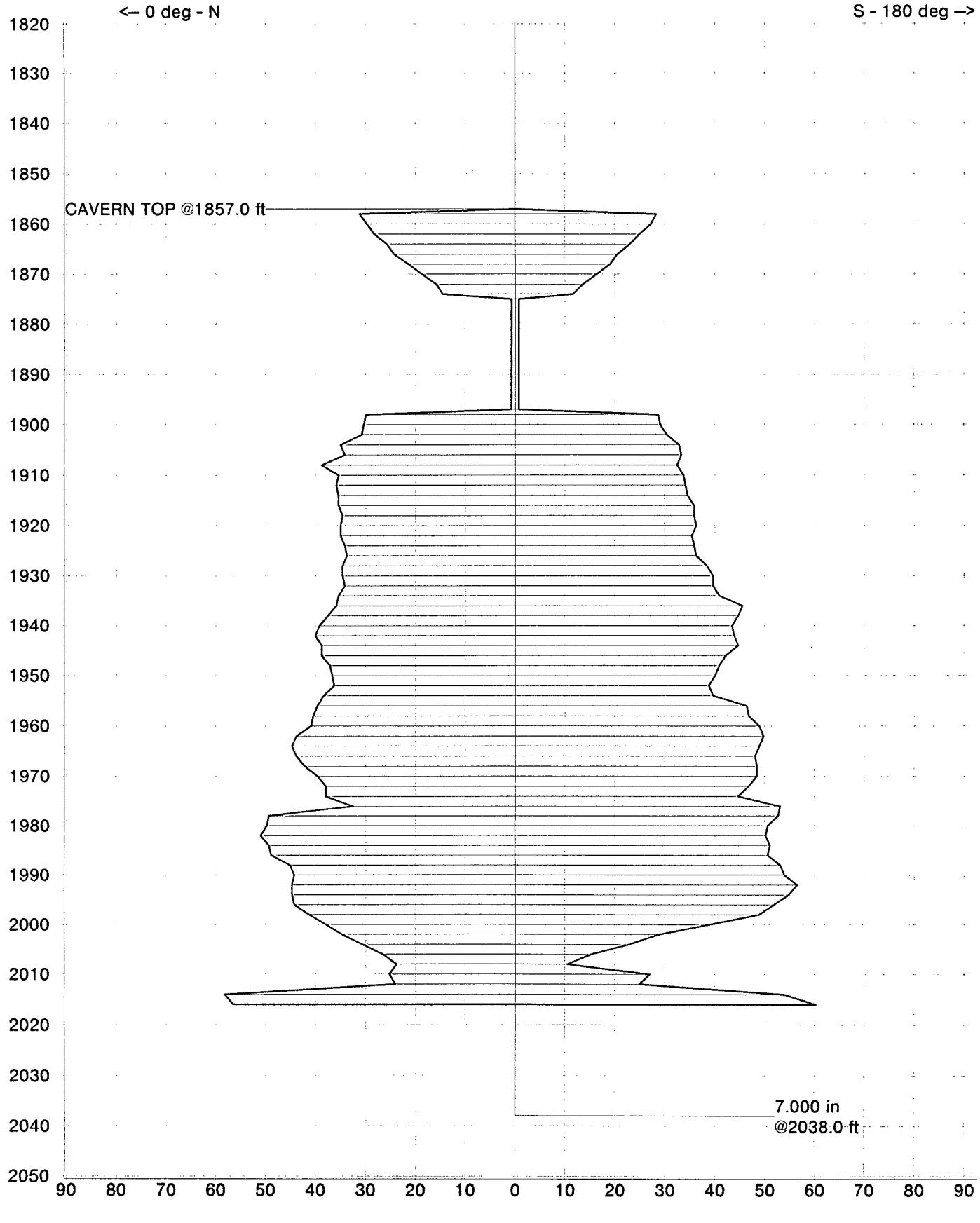


J.V. Baker #002
J.V. Baker #001
J.V. Baker #003
Eunice SWD Well
Skelly #004
Proposed Acid Gas Injection Well
159
103
170
King
207
Google

TARGA RESOURCES
EUNICE, NM

SONARWIRE, INC
Vertical Cross Section

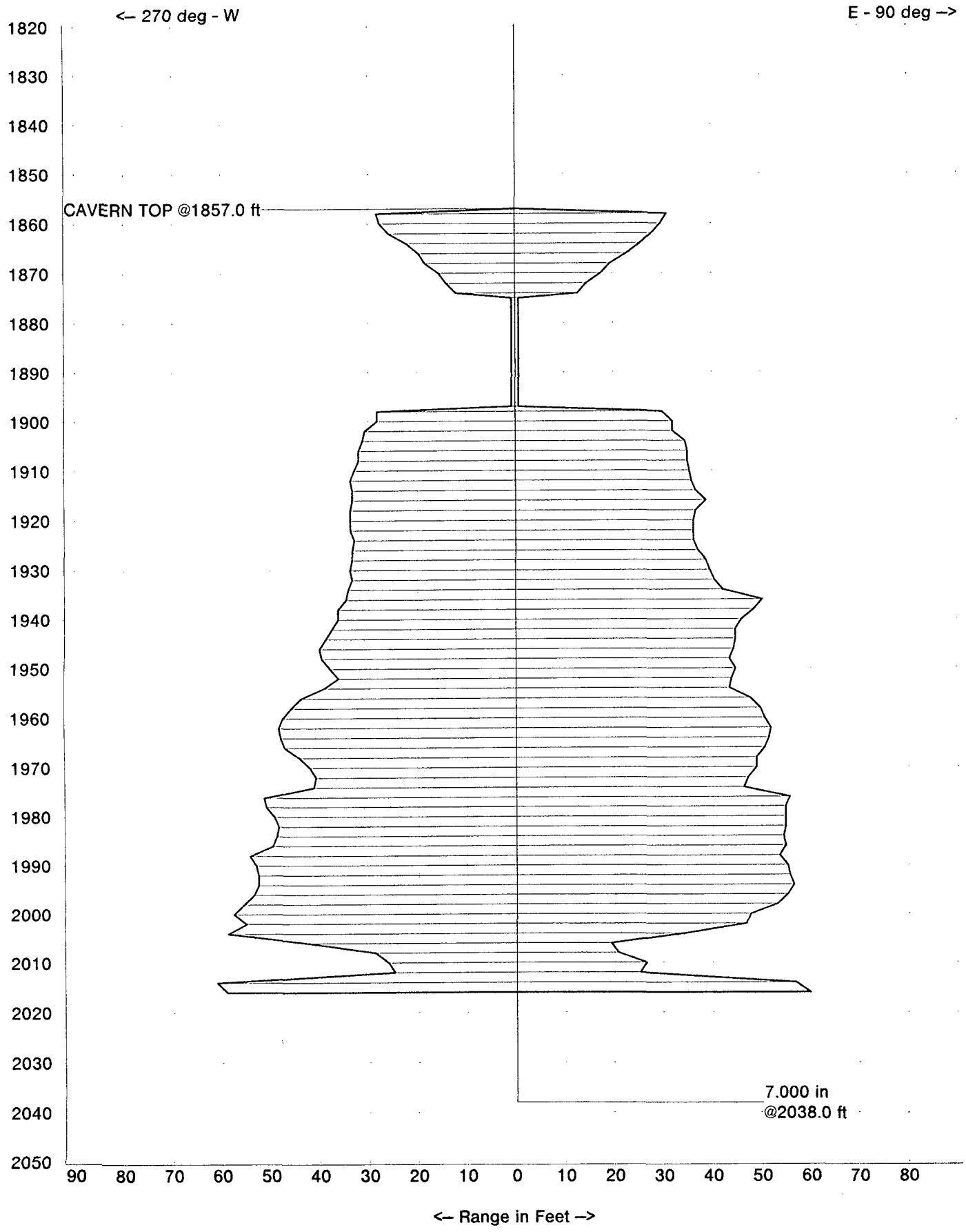
WELL Y GRADE #4
Thu, Jul 12, 2007



TARGA RESOURCES
EUNICE, NM

SONARWIRE, INC
Vertical Cross Section

WELL Y GRADE #4
Thu, Jul 12, 2007



SONARWIRE INC.
Depth versus Volume

TARGA RESOURCES
EUNICE, NM

WELL Y GRADE #4
Thu, Jul 12, 2007

Depth	Cubic ft. per ft.	Cubic ft. total	Barrels per ft.	Barrels total
1858	0.6	0.6	0.1	0.1
1860	2739.9	5480.3	488.0	976.1
1862	2492.1	10464.5	443.9	1863.8
1864	2167.3	14799.1	386.0	2635.8
1866	1837.8	18474.6	327.3	3290.5
1868	1515.6	21505.7	269.9	3830.3
1870	1201.6	23909.0	214.0	4258.4
1872	932.7	25774.3	166.1	4590.6
1874	670.4	27115.0	119.4	4829.4
1876	263.0	27641.1	46.8	4923.1
1878	1.7	27644.5	0.3	4923.7
1880	1.7	27647.9	0.3	4924.3
1882	1.7	27651.3	0.3	4924.9
1884	1.7	27654.7	0.3	4925.5
1886	1.7	27658.1	0.3	4926.1
1888	1.7	27661.6	0.3	4926.7
1890	1.7	27665.0	0.3	4927.3
1892	1.7	27668.4	0.3	4928.0
1894	1.7	27671.8	0.3	4928.6
1896	1.7	27675.2	0.3	4929.2
1898	1.7	27678.6	0.3	4929.8
1900	2744.2	33167.1	488.8	5907.3
1902	3052.2	39271.4	543.6	6994.5
1904	3378.6	46028.7	601.8	8198.1
1906	3778.1	53584.8	672.9	9543.9
1908	3885.6	61355.9	692.1	10928.0
1910	3917.4	69190.6	697.7	12323.4
1912	4094.0	77378.6	729.2	13781.7
1914	4221.3	85821.3	751.9	15285.4
1916	4363.5	94548.4	777.2	16839.8
1918	4408.4	103365.2	785.2	18410.1
1920	4324.0	112013.3	770.1	19950.4
1922	4506.0	121025.3	802.6	21555.5
1924	4342.6	129710.4	773.4	23102.4
1926	4200.2	138110.8	748.1	24598.6
1928	4403.5	146917.8	784.3	26167.2
1930	4635.7	156189.3	825.7	27818.5
1932	4817.4	165824.1	858.0	29534.5
1934	4962.5	175749.0	883.9	31302.3
1936	5222.3	186193.5	930.1	33162.5
1938	5773.3	197740.2	1028.3	35219.1
1940	5763.7	209267.5	1026.6	37272.2
1942	5718.7	220704.8	1018.5	39309.2
1944	5765.6	232236.0	1026.9	41363.0
1946	5665.3	243566.7	1009.0	43381.1
1948	5549.5	254665.8	988.4	45357.9

TARGA RESOURCES
EUNICE, NM

WELL Y GRADE #4
Thu, Jul 12, 2007

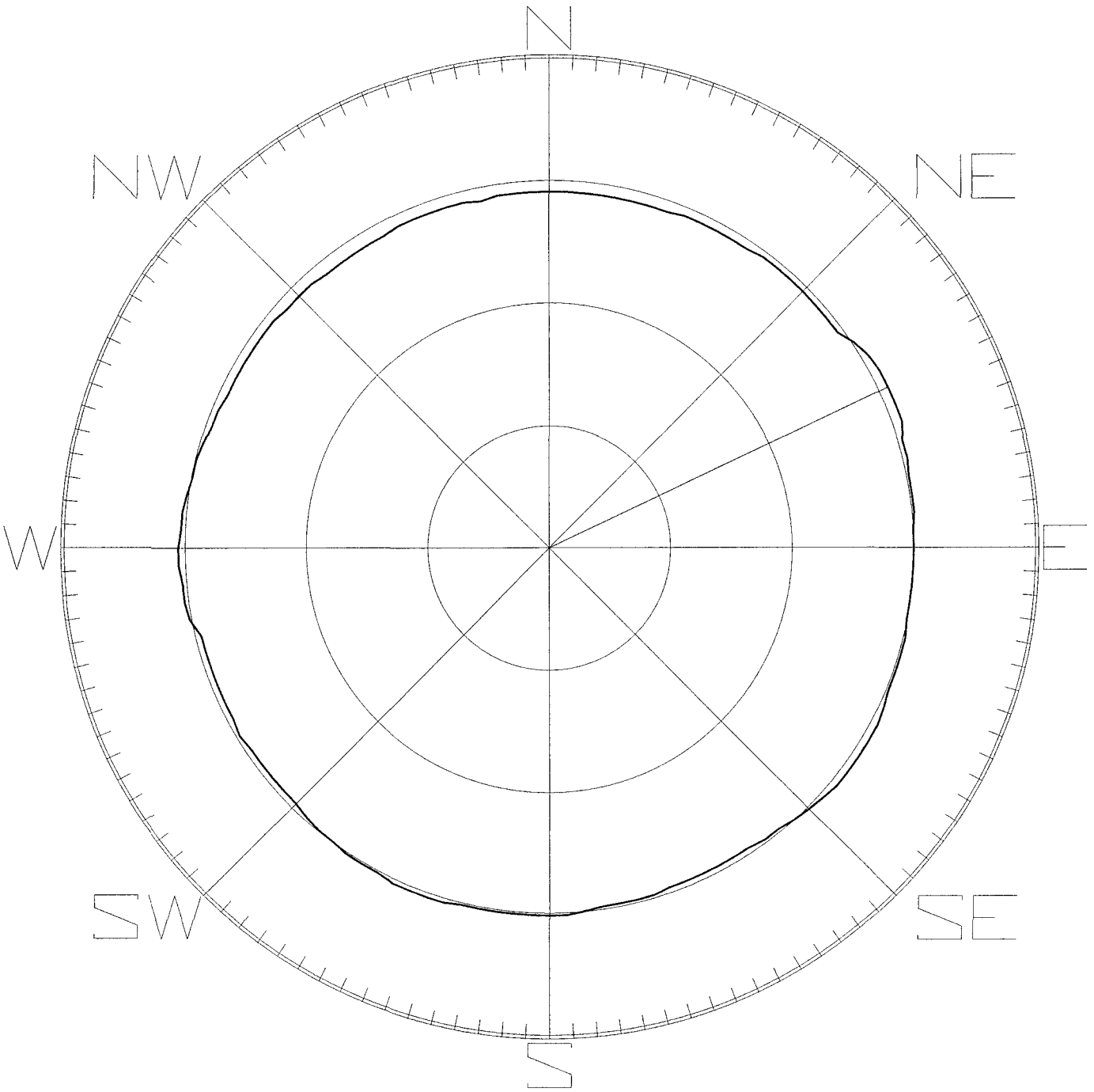
Depth	Cubic ft. per ft.	Cubic ft. total	Barrels per ft.	Barrels total
1950	5465.9	265597.5	973.5	47305.0
1952	5508.9	276615.2	981.2	49267.3
1954	5465.3	287545.8	973.4	51214.1
1956	5683.3	298912.4	1012.2	53238.6
1958	6315.5	311543.4	1124.8	55488.3
1960	6823.3	325189.9	1215.3	57918.8
1962	7127.3	339444.5	1269.4	60457.7
1964	7353.2	354150.9	1309.7	63077.0
1966	7238.7	368628.3	1289.3	65655.5
1968	6949.1	382526.5	1237.7	68130.9
1970	6662.0	395850.4	1186.6	70504.0
1972	6270.6	408391.7	1116.8	72737.7
1974	5771.0	419933.7	1027.9	74793.4
1976	6093.2	432120.0	1085.2	76963.9
1978	7738.1	447596.2	1378.2	79720.3
1980	8560.8	464717.9	1524.7	82769.8
1982	8455.6	481629.1	1506.0	85781.9
1984	8464.8	498558.8	1507.7	88797.2
1986	8339.6	515238.1	1485.4	91767.9
1988	8117.0	531472.1	1445.7	94659.3
1990	8238.6	547949.4	1467.4	97594.0
1992	8478.2	564905.8	1510.0	100614.1
1994	8721.8	582349.5	1553.4	103720.9
1996	8222.2	598793.9	1464.4	106649.8
1998	7694.6	614183.2	1370.5	109390.8
2000	7141.3	628465.9	1271.9	111934.6
2002	6306.9	641079.6	1123.3	114181.2
2004	5239.3	651558.3	933.2	116047.6
2006	3617.5	658793.2	644.3	117336.2
2008	1909.1	662611.3	340.0	118016.2
2010	1355.0	665321.3	241.3	118498.9
2012	2106.3	669533.8	375.1	119249.1
2014	3583.3	676700.5	638.2	120525.6
2016	10429.9	697560.2	1857.6	124240.9

TARGA RESOURCES
WELL Y GRADE #4
EUNICE, NM

SONARWIRE, INC

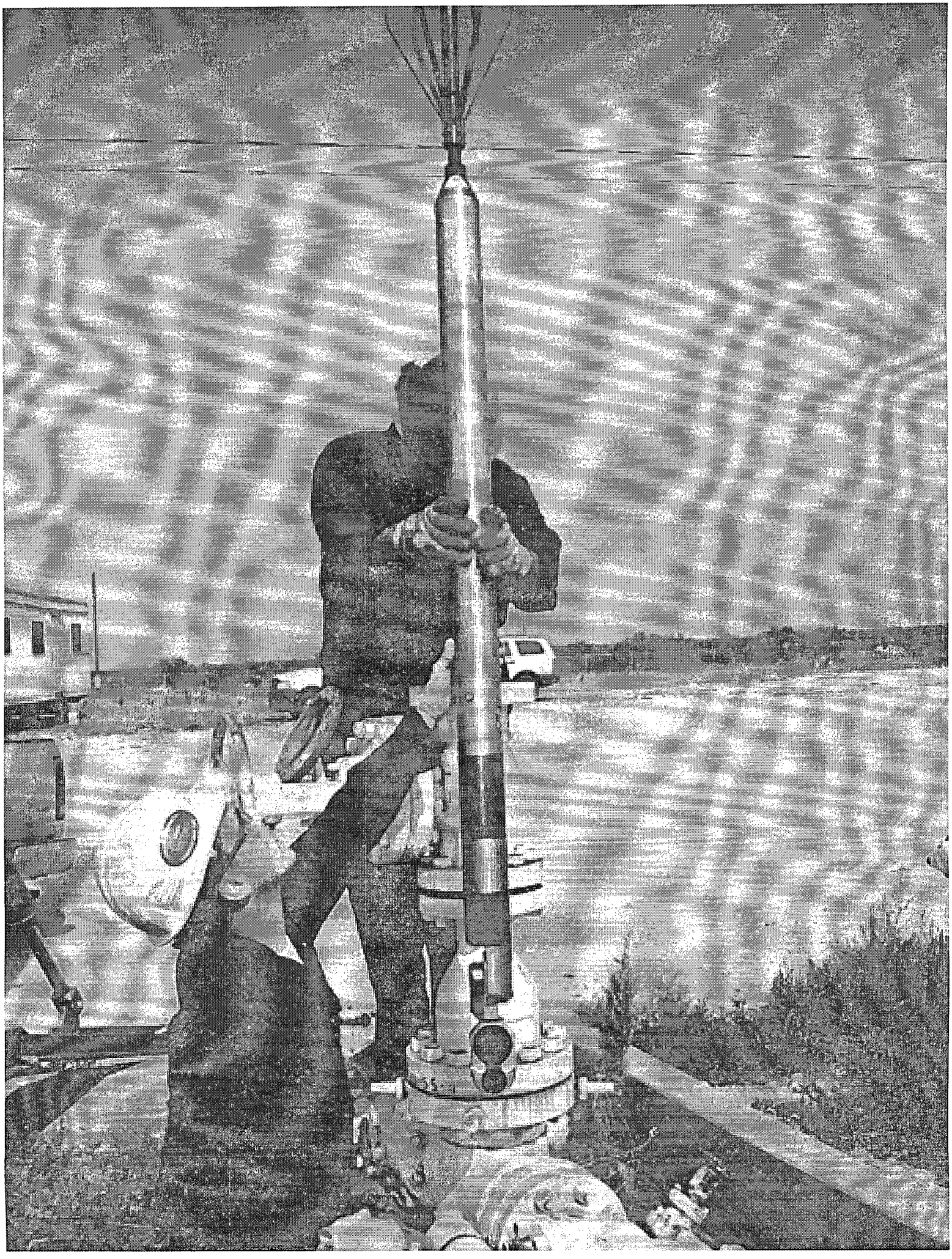
Max Range vs Bearing

Max Radius= 61.6 ft @ 64.7 deg
Depth= 1990 ft. Thu, Jul 12, 2007



1 inch = 25.0 ft.

80 70 60 50 40 30 20 10 0 10 20 30 40 50 60 70 80



Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Wednesday, June 06, 2007 11:34 AM
To: 'Alberto A. Gutierrez, RG'; Jones, William V., EMNRD
Cc: Brooks, David K., EMNRD; Williams, Chris, EMNRD; Price, Wayne, EMNRD; Macquesten, Gail, EMNRD; wcarr@hollandhart.com; 'Ocean Munds-Dry'; 'White, Clark'; 'Wrangham, Calvin W.'
Subject: RE: Division Case 13865: Targa's proposed Acid Gas Injection Well near Eunice, NM

Alberto:

Hi. If you could also scrutinize your tables on page 3 of 4 "Storage Cavity Capacity (ft3) " based on the 5.61 ft3/bbl calculation. The "Storage Cavity Capacity (bbl) should be multiplied by the 5.61 ft3/bbl resulting in a significantly larger ft3 value for the "Storage Cavity Capacity (ft3)." I think the EB's main concern now is how you derived the size for Barrel Salt Cavity values in your tables. If these values are estimated and without sound basis, we would still require a sonic test on the nearest cavity at a minimum, which appears to be the Skelly Plant 004. Thank you.

From: Alberto A. Gutierrez, RG [mailto:aag@geolex.com]
Sent: Wednesday, June 06, 2007 11:25 AM
To: Jones, William V., EMNRD
Cc: Brooks, David K., EMNRD; Williams, Chris, EMNRD; Chavez, Carl J, EMNRD; Price, Wayne, EMNRD; Macquesten, Gail, EMNRD; wcarr@hollandhart.com; 'Ocean Munds-Dry'; 'White, Clark'; 'Wrangham, Calvin W.'
Subject: RE: Division Case 13865: Targa's proposed Acid Gas Injection Well near Eunice, NM

Will:
I have just realized that the an erroneous version of my letter to you and one that was missing the attachment A was forwarded along with my message yesterday in my haste to get it to Carl as soon as possible.

This is being corrected and I have recalled all the messages that have not yet been read. A corrected version will be sent out before 1pm today. Again, I sincerely apologize to all the recipients for this error, I should have checked over the attachment more carefully.
Sincerely
Alberto A. Gutierrez

Chavez, Carl J, EMNRD

From: Price, Wayne, EMNRD
Sent: Tuesday, January 22, 2008 1:02 PM
To: Cal Wrangham (cwrangham@targaresources.com)
Cc: Chavez, Carl J, EMNRD
Subject: GW-0344 Brine Pond Closure

OCD is in receipt of the revised closure plan for the #3 brine pond for the Eunice south compressor station. OCD hereby approves of the plan.

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

Wayne Price-Environmental Bureau Chief
Oil Conservation Division
1220 S. Saint Francis
Santa Fe, NM 87505
E-mail wayne.price@state.nm.us
Tele: 505-476-3490
Fax: 505-476-3462

Larson & Associates, Inc.
Environmental Consultants

RECEIVED
2008 JAN 17 AM 9 56

January 11, 2008

VIA EMAIL: wprice@state.nm.us
VIA CERTIFIED MAIL

Mr. Wayne Price
Bureau Chief
New Mexico Oil Conservation Division
1220 So. St. Francis Drive
Santa Fe, New Mexico 87505

Re: Revised Closure Plan – #3 Brine Pond
Targa Midstream Services, L.P., Eunice South Compressor Station (GW-0344)
Unit F (SE/4, NW/4), Section 27, Township 22 South, Range 37 East
Lea County, New Mexico

Dear Mr. Price:
This revised closure plan is submitted to the New Mexico Oil Conservation Division (OCD) on behalf of Targa Midstream Services, L.P. (TMS) by Larson & Associates, Inc. (LAI), its consultant, for the #3 brine pond located at the Eunice #1 (South) Compressor Station (Facility). The Facility is located in unit F (SE/4, NW/4), Section 27, Township 22 South, Range 37 East, in Lea County, New Mexico. The #3 brine pond is situated at latitude north 32° 21' 47.7" and longitude west 103° 09' 14.4". Figure 1 presents a location and topographic map.

Background and Setting
The Facility previously operated as a natural gas processing plant, but currently operates as a compressor station. Three (3) lined storage ponds were located near the northeast corner of the Facility and were used for brine water displaced from cavern (jug) wells (Pond #2 and Pond #3), and process water (Pond #4). The north (#2) and south (#4) ponds were closed by the previous owner, Texaco Exploration and Production, Inc. (TEPI) during October and November 2000. Documents show that the ponds were lined with 45-mill nylon reinforced butyl liners. The OCD required TMS to close the #3 brine pond as a condition (#16.A.B.) for renewal of the Facility's discharge permit (GW-0344). Figure 2 presents a Facility drawing showing the pond locations.

In June 2007, TMS removed salt-contaminated sediment and the liner from the #3 brine pond, which was disposed at Controlled Recovery, Inc. (CRI) near Carlsbad, New Mexico. A small amount of contaminated soil was also disposed at Sundance Disposal Services, Inc., near Eunice, New Mexico. The #3 brine pond is about 8 feet deep and surrounded by an earthen berm approximately 8 feet high.

In July 2007, LAI sampled soil beneath the #3 brine pond using an air-rotary rig equipped, split-spoon and jam tube samplers. The soil samples were collected at the surface, 5, 10, 15, 20, 30 and 40 feet below the pond from five (5) locations (center, NE, NW, SE and SW). The samples were analyzed by an environmental laboratory (DHL Analytical Laboratories) for total petroleum hydrocarbons (TPH) using method 8015 for gasoline range organics (GRO) and diesel range organics (DRO), and chloride, using method 300. The laboratory analyzed three (3) samples from the center location (ground, 5 and 10 feet) for benzene, toluene, ethylbenzene and xylene (BTEX) using method 8021B, as headspace readings in these samples exceeded 100

parts per million (ppm). Figure 3 presents a drawing for the #3 brine pond showing the sample locations. The analytical reports and summary tables were previously submitted to the OCD in a document titled, "*Brine Pond Investigation Report and Closure Plan, Targa Midstream Services, L.P., Eunice South Compressor Station (GW-0344), Unit F (SE/4, NW/4), Section 27, Township 22 South, Range 37 East, Lea County, New Mexico, October 8, 2007*".

No BTEX was reported in samples collected from the center location. The highest TPH was 338.2 milligrams per kilogram (mg/Kg) and occurred in the sample from 30 feet at the northwest (NW) location. TPH was below the test method detection limit ((<6.1998 mg/Kg) in the deeper sample (20 feet) and 0.0681 mg/Kg in the sample from 40 feet at the northwest (NW) location. TPH in the remaining samples was less than 21.117 mg/Kg. Chloride decreased to less than 1,000 mg/Kg in samples from 40 feet at all locations except the southeast (SE) where chloride was 17,400 mg/Kg. Appendix A presents photographs.

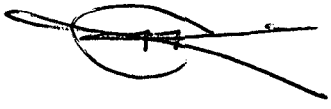
Revised Closure Plan

As discussed during our meeting on January 8, 2008, OCD concurred that groundwater was impaired by chloride from historic operations and Chevron USA, Inc, as successor-company to TEPI, is remediating the groundwater. Further, OCD agreed that TMS could close the #3 brine pond by installing a compacted clay liner in the bottom of the pond and filling the remaining excavation with clean fill. Therefore, clay will be placed in the bottom of the pond to about 2 feet thick near the center and tapered to approximately 1 foot near the edges. The remainder of the excavation will be filled clean soil derived from the berm and offsite, if needed. The soil layer will be about 5 feet thick. The surface will be crowned to prevent water from collecting and seeded. Figure 4 presents a cross section for the pond closure.

TMS will notify the OCD within five (5) days of beginning work and will submit a letter confirming closure within 45 days after completion of the project. Your approval is greatly appreciated. Please call Mr. Cal Wrangham with TMS at (432) 688-0542) or myself at (432) 687-0901, if you have questions. We may be reached by email at cwrangham@targaresources.com or mark@laenvironmental.com.

Sincerely,

Larson & Associates, Inc.



Mark J. Larson, P.G., C.P.G., GC.G.W.P.
Senior Project Manager

Encl.

cc: Cal Wrangham – TMS
James Lingnau – TMS
Larry Johnson – OCD District 1

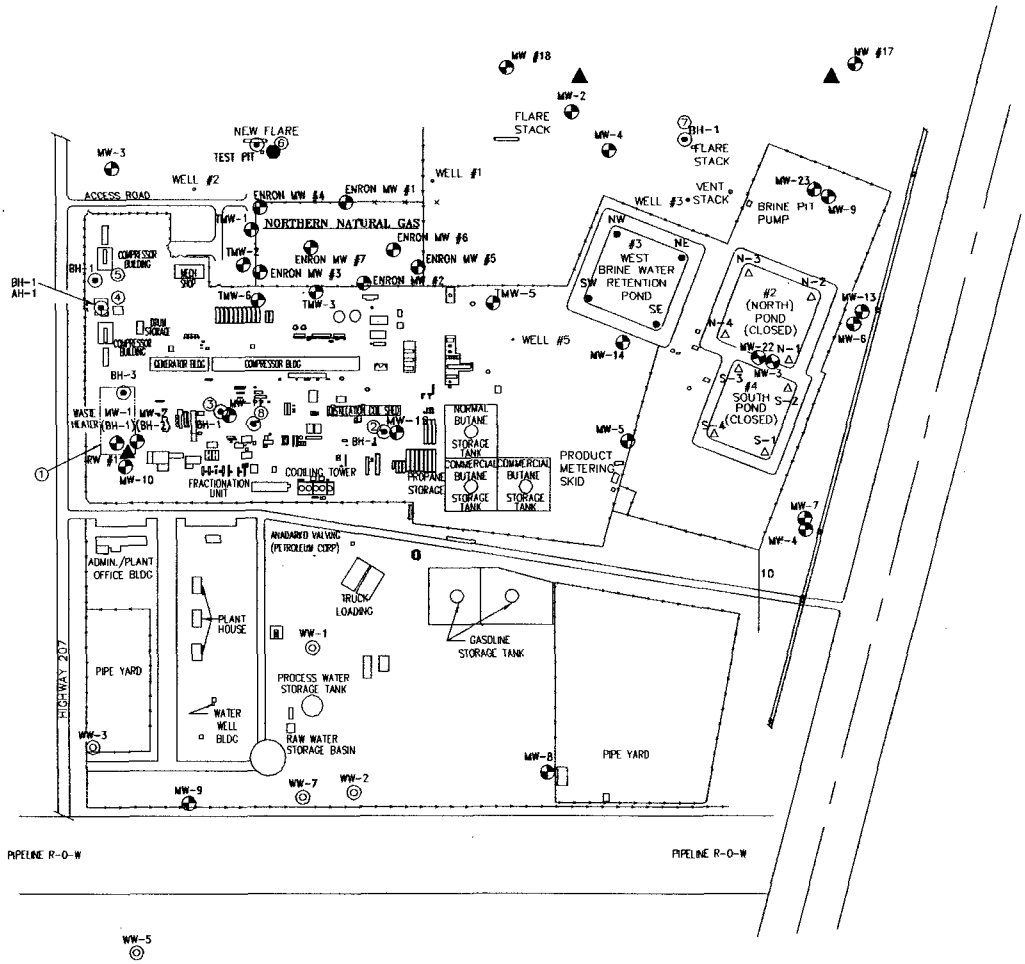
Figures

PN 7-0123

TARGA MIDSTREAM SERVICES, L.P.
EUNICE #1 (SOUTH) COMPRESSOR STAION

Larson & Associates, Inc.
Environmental Consultants

FIGURE 1- TOPOGRAPHIC MAP



LEGEND

- ▲ RECOVERY WELL LOCATION
- ● PROPOSED BORING LOCATION
- S-1 △ BOREHOLE LOCATION, JANUARY 2000
- NW • BOREHOLE LOCATION, JULY 2007
- BH-1 ◉ BOREHOLE LOCATION
- MW-1 ⊕ MONITOR WELL LOCATION
- WW-1 ◎ WATER WELL LOCATION (INACTIVE)
- WW-4 • WATER WELL LOCATION (ACTIVE)

ENVIRONMENTAL INVESTIGATION AREAS

1. JET TURBINE SKID
2. SLOP OIL SUMP
3. OIL AND WATER SUMP
4. SUMP #30
5. SUMP #31
6. EMERGENCY FLARE
7. H2S FLARE SUMP
8. CONCRETE SUMP (WEST OF TANK #14)

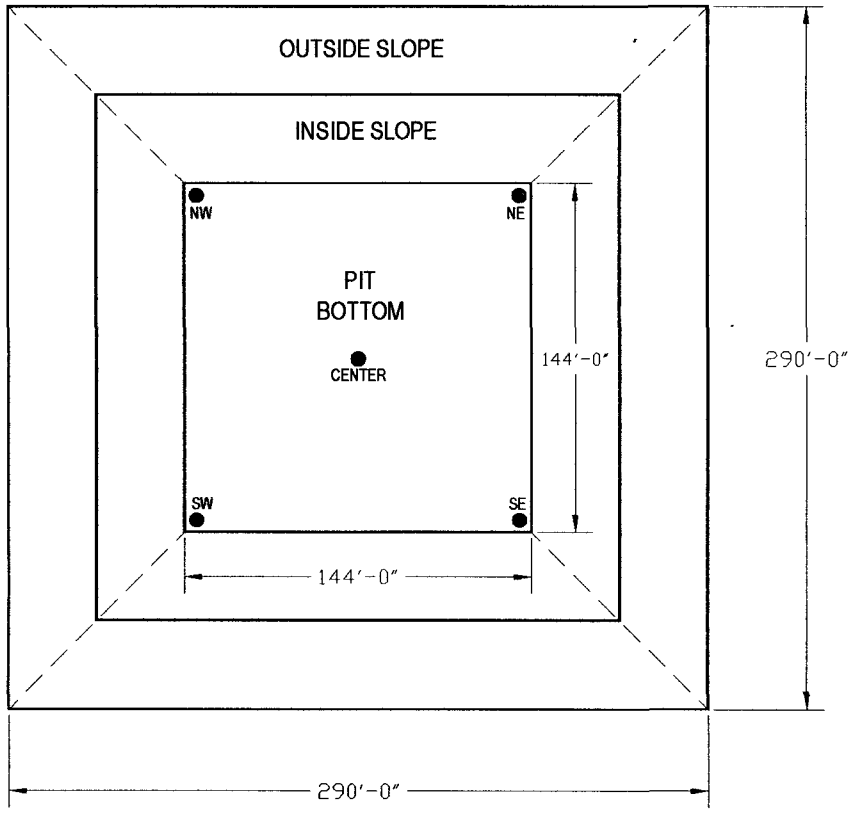
500 0 500

TARGA MIDSTREAM SERVICES, L.P.

EUNICE #1 (SOUTH) COMPRESSOR STAION

Larson & Associates, Inc.
Environmental Consultants

FIGURE 2- FACILITY DRAWING



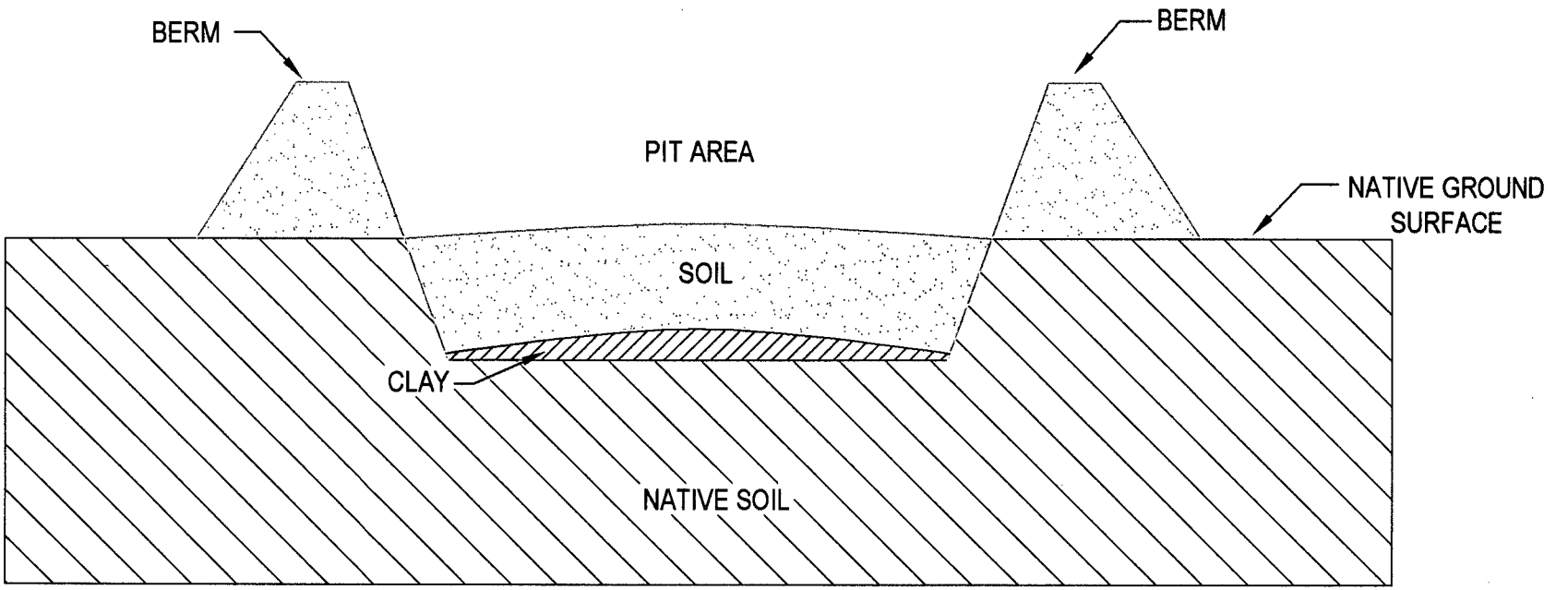
LEGEND

NW ● SOIL BORING LOCATION

TARGA MIDSTREAM SERVICES, L.P.
EUNICE #1 (SOUTH) COMPRESSOR STAION

Larson & Associates, Inc.
Environmental Consultants

FIGURE 3- POND # 3 DRAWING



1" = 10'
VERTICAL SCALE

1" = 50'
HORIZONTAL SCALE

TARGA MIDSTREAM SERVICES, L.P.
EUNICE #1 (SOUTH) COMPRESSOR STAION

Larson & Associates, Inc.
Environmental Consultants

FIGURE 4- WEST TO EAST CROSS SECTION

Appendix A

Photographs

Larson & Associates, Inc.
Environmental Consultants

Targa Midstream Services, L.P., Eunice #1 (South) Compressor Station – Looking Northwest at #3 Brine Pond from Monitoring Well MW-22 (located between Closed #2 (North) and #4 (South) Ponds)

Targa Midstream Services, L.P., Eunice #1 (South) Compressor Station – Looking Northwest at #3 Brine Pond from Southeast Corner

Targa Midstream Services, L.P., Eunice #1 (South) Compressor Station – Looking Northeast at #3 Brine Pond from Southwest Corner

Targa Midstream Services, L.P., Eunice #1 (South) Compressor Station – Looking East at #2 (North) Pond (Closed) from Southeast Corner of #3 Brine Pond

Targa Midstream Services, L.P., Eunice #1 (South) Compressor Station – Looking Northeast at #2 (North) Pond (Closed) from Southeast Corner of #3 Brine Pond

Targa Midstream Services, L.P., Eunice #1 (South) Compressor Station – Looking Southeast at #4 (South) Pond (Closed) from Southeast Corner of #3 Brine Pond

Targa Midstream Services, L.P., Eunice #1 (South) Compressor Station – Looking Southeast at #4 (South) Pond (Closed) from Southeast Corner of #3 Brine Pond