

**NM2 - \_\_\_\_\_ 19 \_\_\_\_\_**

**GENERAL  
CORRESPONDENCE  
YEAR(S):**

**\_\_\_\_\_ 2022 - 2024 \_\_\_\_\_**

**Jones, Brad A., EMNRD**

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**From:** Jones, Brad A., EMNRD  
**Sent:** Tuesday, March 15, 2022 12:57 PM  
**To:** Boultinghouse, Stacy  
**Cc:** Christine.Mathews@ghd.com  
**Subject:** Facility Closure/Post-Closure Cost Estimate  
**Attachments:** 2022 0315 NM2-019 ETC Texas Pipeline Ltd Limited Partnership Facility Closure and Post-Closure Cost Estimate signed.pdf

Stacy,

Please see the attached. OCD has completed the review of the facility closure/post-closure estimate. If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

Brad Jones

**Brad A. Jones** • Environmental Scientist Specialist - Advanced  
Environmental Bureau  
EMNRD - Oil Conservation Division  
1220 S. Saint Francis Drive | Santa Fe, New Mexico 87505  
(505) 469-7486 | [brad.a.jones@state.nm.us](mailto:brad.a.jones@state.nm.us)  
[www.emnrd.nm.gov](http://www.emnrd.nm.gov)

State of New Mexico  
Energy, Minerals and Natural Resources Department

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**Michelle Lujan Grisham**  
Governor

**Sarah Cottrell Propst**  
Cabinet Secretary

**Todd E. Leahy, JD, PhD**  
Deputy Secretary

**Adrienne Sandoval, Division Director**  
Oil Conservation Division



March 15, 2022

Stacy Boultinghouse  
ETC Texas Pipeline Ltd., Limited Partnership  
8111 Westchester Dr., Suite 600  
Dallas, Texas 75225

**Re: Facility Closure/Post-Closure Cost Estimate  
ETC Texas Pipeline Ltd., Limited Partnership (OGRID 328923)  
Permit NM2-019  
Location: Unit F of Section 36, Township 23 South, Range 36 East, NMPM,  
Lea County, New Mexico**

Ms. Boultinghouse:

The Oil Conservation Division (OCD) has received ETC Texas Pipeline Ltd., Limited Partnership's (ETC) surface waste management facility closure/post-closure cost estimate, as requested by OCD Management, for Jal No. 4 Landfarm under OCD permit NM2-019. OCD will place the demonstration in the administrative record for NM2-019. It can be accessed from OCD Imaging through the following hyperlink: <https://ocdimage.emnrd.nm.gov/Imaging/AEOrderFileView.aspx?appNo=pMJK0131033037>.

If there are any questions regarding this matter, please do not hesitate to email me at [brad.a.jones@state.nm.us](mailto:brad.a.jones@state.nm.us).

Respectfully,

Brad A. Jones  
*Environmental Specialist*

Cc: Christine Mathews, GHD

## Jones, Brad A., EMNRD

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**From:** Boultinghouse, Stacy <Stacy.Boultinghouse@energytransfer.com>  
**Sent:** Tuesday, March 2, 2021 2:25 PM  
**To:** Jones, Brad A., EMNRD  
**Subject:** [EXT] Financial Assurance  
**Attachments:** APP C - 082148Boultinghouse3-Landfarm Closure Work Plan.pdf

"of all the paths you take in life,  
make sure a few of them are dirt"



**Stacy Boultinghouse, PG**<sub>(TX4889/LA73)</sub>  
EH&S Environmental-Sr. Manager  
Emergency Response/Remediation/ Waste/Water  
Energy Transfer

**O:** 210.870.2725  
**C:** 281.740.0494

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This email may contain confidential attorney-client privileged information or attorney work product. If you received this email in error, please contact me at one of the above phone numbers.

Private and confidential as detailed [here](#). If you cannot access hyperlink, please e-mail sender.



December 6, 2018

Reference No. 082148

Ms. Stacy Boultinghouse, P.G.  
ETC Field Services LLC  
800 Sonterra Blvd, Ste. 400  
San Antonio, Texas 78258

Dear Ms. Boultinghouse:

**Re: Landfarm PostClosure Plan  
Jal Landfarm  
NM-02-0019  
Lea County, New Mexico**

GHD Services Inc. (GHD) appreciates the opportunity to submit this proposed work plan to ETC Field Services LLC (ETC) for the Jal Landfarm (hereafter referred to as the "Landfarm"). The Landfarm is located in the SE/4 of the NW/4 of Section 36, Township 23 South (T-23S), Range 36 East (R-36E) in Lea County, New Mexico (Figure 1). The Landfarm lies on the south side of Deep Wells Road, approximately two miles west of Highway 18. This work plan has been prepared to close the Jal Landfarm in accordance with Sections 19.15.36.18 of the New Mexico Administrative Code (NMAC).

## 1. Background

The Landfarm (permit number NM-02-0019) is situated on land owned by ETC and is surrounded by land used for cattle grazing and oil and gas exploration.

The ETC Jal No. 4 (formerly Regency Field Services, LP) Landfarm is located in Lea County, New Mexico. The facility is located approximately 10 miles north of Jal, New Mexico to the south of Deep Wells Road and approximately 2 miles west of Highway 18 in Lea County. The Landfarm consists of 15 soil treatment cells, ranging in surface area from 0.35 acres to 4.92 acres (Figure 2). The total area of the Landfarm is over 40 acres. The Landfarm is currently in closure monitoring.

## 2. Proposed Landfarm Closure Scope of Work

The proposed Landfarm closure scope of work will consist of the following activities:

- Provide 60-day notification to the NMOCD of the intent to close.
- Upon approval from the NMOCD, level the berms at the site.
- Disking all of the roads associated with the Landfarm in accordance with 19.15.36.18(A)(6).
- Re-seeding of the landfall with an approved seed mixture in accordance with 19.15.36.18(A)(6).



- Performing semi-annual vegetation monitoring for noxious weeds and evidence of new growth.
- Perimeter fencing will be left in place since the property is privately owned. This will also allow for the re-establishment of vegetation without influence from cattle in the area.

GHD will prepare a closure report following completion of the above listed activities. The report will be prepared and submitted to the NMOCD following ETC review and approval. The report will include a site description, brief project history, and a description of field events.

### 3. Cost Estimate

GHD has divided the cost structure into the elements indicated below. These estimates are based on GHD's experience and are typical for this scope of work.

Work Scope Description – Total Project Summary	Amount
Work Plan and Project Preparation	\$1,590.00
Landfarm Closure Site Work	\$89,952.00
Semi-Annual Site Visit for Vegetation Observation	\$1,932.00
Closure Report	\$2,330.00
NMOCD Regulatory Interaction	\$590.00
<b>Subtotal</b>	<b>\$96,394.50</b>
New Mexico Lea County Gross Receipts Tax (5.5%)	\$5,301.70
<b>Total</b>	<b>\$101,696.20</b>

A more detailed breakdown of the cost estimate is included as Table 1.

GHD appreciates the opportunity to submit this Proposal to ETC to assist with the closure of the Jal Landfarm. Please feel free to contact GHD at 505-884-0672 if you have questions or comments.

Sincerely,

GHD

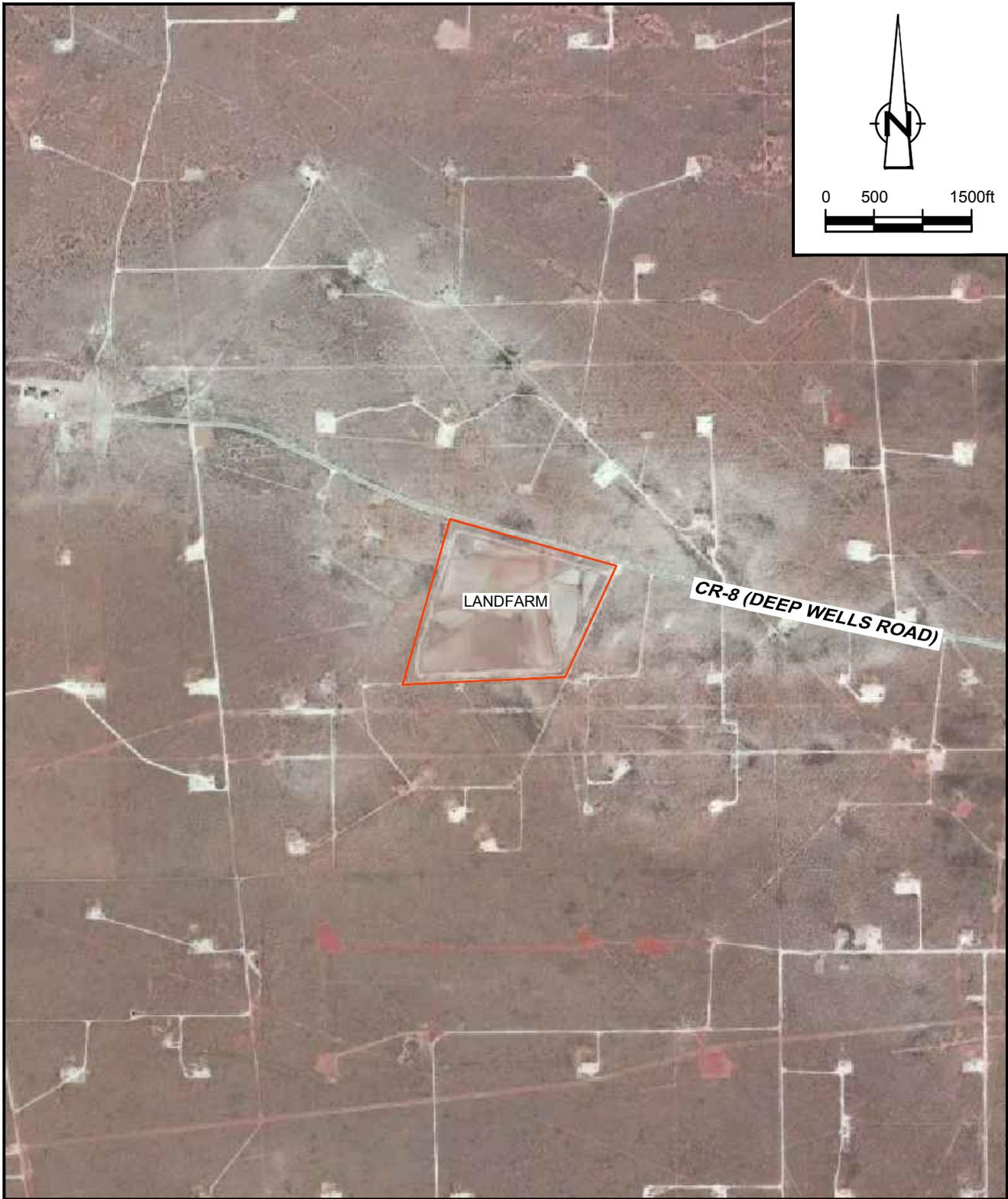
Christine Mathews  
Project Scientist

Alan Brandon  
Senior Project Manager

AB/ji/3

Encl.

# Figures

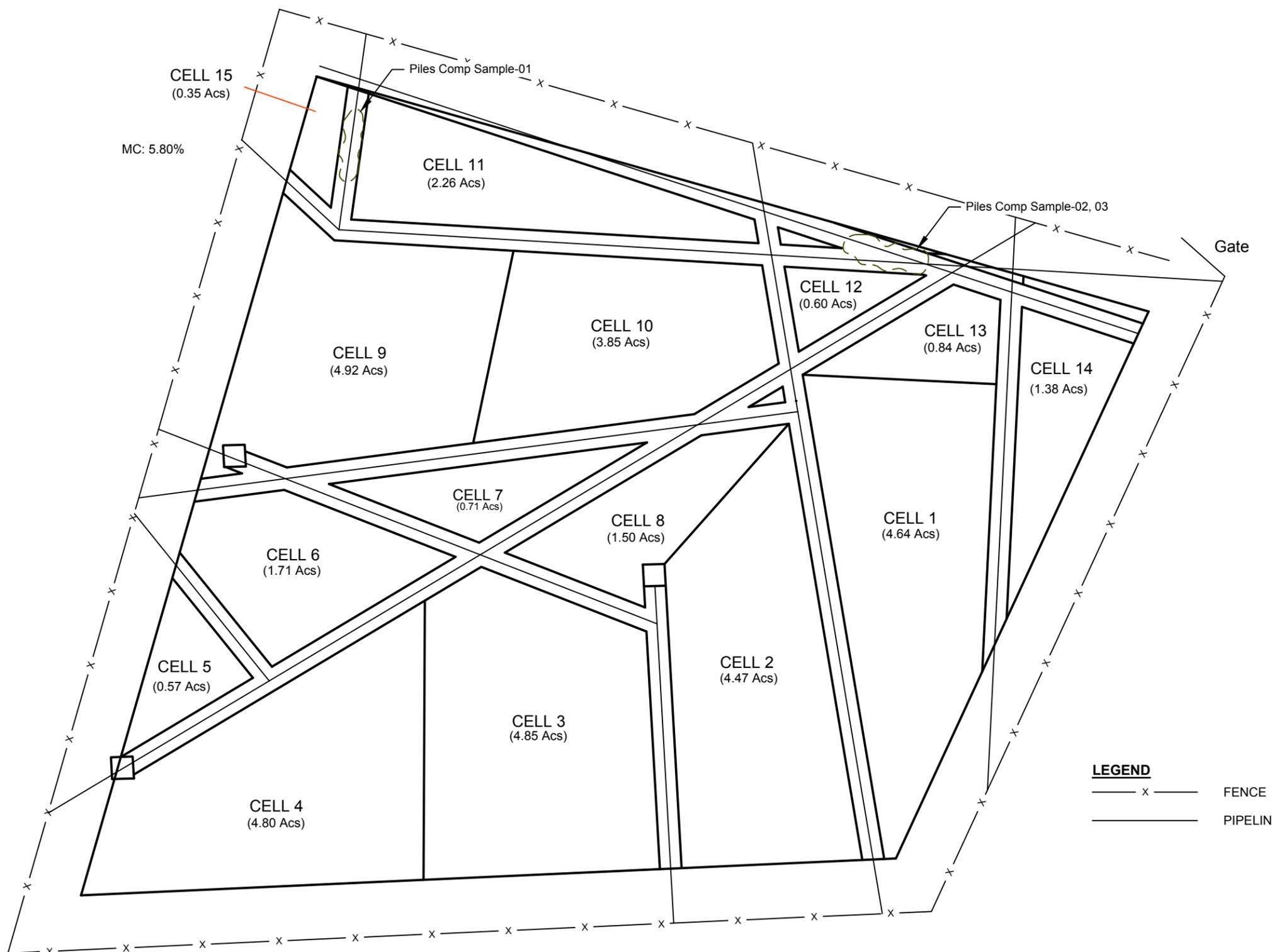
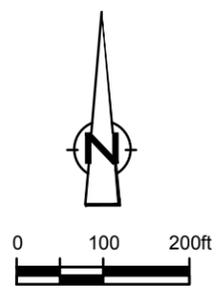


LAT/LONG: 32.261° NORTH, 103.220° WEST  
COORDINATE: NAD83 DATUM, U.S. FOOT  
STATE PLANE ZONE - NEW MEXICO EAST

Figure 1

SITE VICINITY MAP  
LEA COUNTY LANDFARM  
SE/4 NW/4 OF SECTION 36  
TOWNSHIP 23 SOUTH, RANGE 38 EAST  
*ETC Field Services, LLC*





**LEGEND**  
 — x — FENCE  
 — PIPELINE

Figure 2

SITE DETAIL MAP  
 JAL LANDFARM  
 SE/4 NW/4 OF SECTION 36  
 TOWNSHIP 23 SOUTH, RANGE 38 EAST  
 ETC Field Services LLC



# Tables

# Table 1 Cost Estimate

**Table 1**  
**Energy Transfer Company**  
**Jal Landfarm Closure Cost Estimate**  
**Lea County, New Mexico**

<b>Description</b>	<b>Quantity</b>	<b>Unit</b>	<b>Unit Rate (\$)</b>	<b>Total</b>
<b>Work Plan and Project Preparation</b>				
Sr. Project Manager	4	hr.	125.00	500.00
Project Scientist	8	hr.	95.00	760.00
Graphics Support	2	hr.	75.00	150.00
Administrator	4	hr.	45.00	180.00
<b>Subtotal</b>				<b>\$1,590.00</b>
<b>Landfarm Closure Site Work (grading, diking roads, re-seeding) Estimate 3 weeks</b>				
Sr. Project Manager	8	hr.	125.00	1,000.00
Project Scientist-15 days (10Hrs/day)	150	hr.	95.00	14,250.00
Vehicle use	15	day	150.00	2,250.00
Mileage	1500	Miles	0.56	840.00
Per Diem (meals and hotel)	15	day	200.00	3,000.00
Contractor - Earth work	1	Ls	62,375.00	62,375.00
Subcontractor mark-up	0	total	10%	6,237.50
<b>Subtotal</b>				<b>\$89,952.50</b>
<b>Semi-Annual Site Visit for Vegetation Observation</b>				
Project Scientist	16	hr.	95.00	1,520.00
Vehicle use	2	day	150.00	300.00
Mileage	200	Miles	0.56	112.00
<b>Subtotal</b>				<b>\$1,932.00</b>
<b>Closure Report</b>				
Senior Project Manager	2	hr.	125.00	250.00
Junior Scientist (report preparation)	16	hr.	115.00	1,840.00
Graphics Support (figures)	2	hr.	75.00	150.00
Administrator	2	hr.	45.00	90.00
<b>Subtotal</b>				<b>\$2,330.00</b>
<b>NMOCD Regulatory Interaction</b>				
Senior Project Manager	4	hr.	125.00	500.00
Administrator	2	hr.	45.00	90.00
<b>Subtotal</b>				<b>\$590.00</b>
<b>Subtotal</b>				<b>96,394.50</b>
<b>New Mexico Lea County Gross Receipts Tax (5.5%)</b>				<b>5,301.70</b>
<b>Total</b>				<b>101,696.20</b>