

**ENERGY TRANSFER**

**via NMOCD Permitting Online**

June 12, 2024

**RE:                    Closure Documentation**  
Harroun LP Fire  
Incident ID nAPP2411761305

To Whom It May Concern,

ETC Texas Pipeline, Ltd (Energy Transfer) is hereby justifying the volume calculations and closure documentation for incident # at the Harroun LP.

A fire at the BTA Oil Harroun Ranch East facility (fAPP2129830694) affected ETC gas gathering equipment. At the time of the fire, the pipeline was blown down to reduce or prevent further damage. ETC gas loss volume was calculated from custody transfer point to the nearest block valve. The volume released is approximated to be 8.5 MCF. Valves were closed to isolate any residual gas. Liquid loss due to the fire is associated with the Harroun Ranch East facility and are addressed in incident ID#: nAPP2411724780 belonging to BTA Oil Producers, LLC.

Should you have any questions or require additional information, please do not hesitate to contact me at [heather.patterson@energytransfer.com](mailto:heather.patterson@energytransfer.com) or (575) 200-7264.

Respectfully,

Heather M. Patterson  
Sr. Environmental Specialist

## Harroun LP Volume Calcs

<b>Pipeline Blow Down</b>				
Blowdown Timeline:	Date (m/dd/yy): 4/25/2024	Time (hr:mm): 19:21	Duration (in min): 120.00	
Blowdown Location:	Latitude: 32.28554	Longitude: -104.00651	Location Detail:	
Blowdown Location Desc:				
Notes	Inside Diameter	Miles	Feet	Volume (Cu Ft)
1	10.0000	0.31		892.74
2				
3				
Equivalent Diameter:	10.0000	Total Length:	1,637	892.74
Start Pressure (psig):	125.0	End Pressure (psig):	0.0	
Start Temperature (Deg F):	69.0	End Temperature (Deg F):	69.0	
Specific Gravity:	0.750	End Volume (MCF):	0.00	
Start Volume (MCF):	8.5			
Was Gas Flared?	No	Total Blowdown (Mcf):	8.5	

# Harroun LP Fire

nAPP2411761305

## Legend

- ETC Pipeline
- Harroun LP



Google Earth



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Oil Conservation Division  
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QUESTIONS

Action 353147

QUESTIONS

Operator: Crestwood New Mexico Pipeline LLC 1706 South Midkiff Midland, TX 79701	OGRID: 330564
	Action Number: 353147
	Action Type: [C-141] Revegetation Report C-141 (C-141-v-Revegetation)

QUESTIONS

<b>Prerequisites</b>	
Incident ID (n#)	nAPP2411761305
Incident Name	NAPP2411761305 HARROUN LP @ 0
Incident Type	Fire
Incident Status	Re-vegetation Report Received
Incident Facility	[fAPP2123159624] Crestwood New Mexico Pipeline

<b>Location of Release Source</b>	
Please answer all the questions in this group.	
Site Name	Harroun LP
Date Release Discovered	04/25/2024
Surface Owner	Federal

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

<b>Nature and Volume of Release</b>	
Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.	
Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Not answered.
Is the concentration of chloride in the produced water >10,000 mg/l	No
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Cause:    Other (Specify)   Released: 0 (Unknown Released Amount)   Recovered: 0   Lost: 0
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Fire included equipment owned by both BTA Operating and Energy Transfer (Crestwood). Cause is unknown and under investigation.

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QUESTIONS, Page 2

Action 353147

**QUESTIONS (continued)**

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**QUESTIONS**

<b>Nature and Volume of Release (continued)</b>	
Is this a gas only submission (i.e. only significant Mcf values reported)	More info needed to determine if this will be treated as a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (2) an unauthorized release of a volume that: (a) results in a fire or is the result of a fire.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. 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
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: Heather Patterson Title: Sr. Environmental Specialist Email: heather.patterson@energytransfer.com Date: 06/12/2024
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QUESTIONS, Page 3

Action 353147

**QUESTIONS (continued)**

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	Action Number:	353147
	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)	Less than or equal 25 (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
<b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>	
A continuously flowing watercourse or any other significant watercourse	Between ½ and 1 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 300 and 500 (ft.)
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 ½ and 1 (mi.)
Any other fresh water well or spring	Between ½ and 1 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 300 and 500 (ft.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Medium
A 100-year floodplain	Between 1000 (ft.) and ½ (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

**Remediation Plan**

Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

Requesting a remediation plan approval with this submission	Yes
Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No

**Soil Contamination Sampling:** (Provide the highest observable value for each, in 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	06/12/2024
On what date will (or did) the final sampling or liner inspection occur	06/12/2024
On what date will (or was) the remediation complete(d)	06/12/2024
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 353147

**QUESTIONS (continued)**

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**QUESTIONS****Remediation Plan (continued)**

Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

**This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:**

(Select all answers below that apply.)

(Ex Situ) Excavation and <b>off-site</b> disposal (i.e. dig and haul, hydrovac, etc.)	No
(Ex Situ) Excavation and <b>on-site</b> remediation (i.e. On-Site Land Farms)	No
(In Situ) Soil Vapor Extraction	No
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	No
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	No
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	No
Ground Water Abatement pursuant to 19.15.30 NMAC	No
OTHER (Non-listed remedial process)	Yes
Other Non-listed Remedial Process. Please specify	Gas only release, fire event

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

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

I hereby agree and sign off to the above statement	Name: Heather Patterson Title: Sr. Environmental Specialist Email: heather.patterson@energytransfer.com Date: 06/12/2024
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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 5  
  
Action 353147

QUESTIONS (continued)

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

QUESTIONS

<b>Deferral Requests Only</b>	
<i>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.</i>	
Requesting a deferral of the remediation closure due date with the approval of this submission	No

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QUESTIONS, Page 6

Action 353147

**QUESTIONS (continued)**

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

**QUESTIONS**

Sampling Event Information	
Last sampling notification (C-141N) recorded	353270
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	06/10/2024
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)	gas loss only, damaged valves have been replaced, meter to be replaced when BTA equipment is repaired

*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: Heather Patterson Title: Sr. Environmental Specialist Email: heather.patterson@energytransfer.com Date: 06/12/2024
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QUESTIONS, Page 7

Action 353147

**QUESTIONS (continued)**

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	Action Number: 353147
	Action Type: [C-141] Revegetation Report C-141 (C-141-v-Revegetation)

**QUESTIONS****Reclamation Report**

Only answer the questions in this group if all reclamation steps have been completed.

Requesting a reclamation approval with this submission	Yes
What was the total reclamation surface area (in square feet) for this site	0
What was the total volume of replacement material (in cubic yards) for this site	0

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.

Is the soil top layer complete and is it suitable material to establish vegetation	Yes
On what (estimated) date will (or was) the reseeding commence(d)	06/12/2024

Summarize any additional reclamation activities not included by answers (above)	gas only release, no soil impact
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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 reseeding plans or relevant field notes, photographs of reclaimed area, and a narrative of the reclamation activities. Refer to 19.15.29.13 NMAC.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

I hereby agree and sign off to the above statement	Name: Heather Patterson Title: Sr. Environmental Specialist Email: heather.patterson@energytransfer.com Date: 06/12/2024
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QUESTIONS, Page 8

Action 353147

**QUESTIONS (continued)**

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	Action Number:	353147
	Action Type:	[C-141] Revegetation Report C-141 (C-141-v-Revegetation)

**QUESTIONS****Revegetation Report**

Only answer the questions in this group if all surface restoration, reclamation and re-vegetation obligations have been satisfied.

Requesting a restoration complete approval with this submission	Yes
What was the total revegetation surface area (in square feet) for this site	0
<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	06/12/2024
On what date was the vegetative cover inspected	06/12/2024
What was the life form ratio compared to pre-disturbance levels	50.1
What was the total percent plant cover compared to pre-disturbance levels	70.1
Summarize any additional revegetation activities not included by answers (above)	gas loss only, no soil impact

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 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.

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

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Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS  
  
Action 353147

CONDITIONS

Operator: Crestwood New Mexico Pipeline LLC 1706 South Midkiff Midland, TX 79701	OGRID: 330564
	Action Number: 353147
	Action Type: [C-141] Revegetation Report C-141 (C-141-v-Revegetation)

CONDITIONS

Created By	Condition	Condition Date
scwells	Accepted App ID 353147 for the record. Duplicate incident to the incident reported by BTA NAPP2411724780 HARROUN RANCH EAST BATTERY - FIRE.	6/13/2024