

**TARGA**

NDL Blowdown/Vent Estimate

All sections should be filled out by field personnel. All red fields per event must be entered to calculate volumes correctly! All yellow fields should be entered if known for increased accuracy.

Date of Occurance (m/d/yyyy)

1/7/2024

Reported By (First and Last Name)

Willie Pierce

Site (Select)

FIELD - RESIDUE PIPE BALANCE

If "FIELD" for Site, Pipe Name

Rojo Toro - NGPL Delivery

Calculated Volumes

Blowdown(s)				Purge/Vent			
Reference Meter Number		Blowdown (MCF)		Reference Meter Number		Volume Lost (MCF)	4,111.47
Pipe ID (in)		Length (Feet)		Beginning Date & Time	01/07/2024 1930	Vent Duration (Hours)	0.50
Begin Press. (PSIG)		End Press. (PSIG)		Ending Date & Time	01/07/2024 2000	Gas Temp	
Gas Temp.		Specific Gravity		Pipe ID (in)	24in Sch. 20	Specific Gravity	
Elevation (ft)				Orifice Size (in)	3	Elevation (ft)	
				Avg Pressure	1,000.00		
Reference Meter Number		Blowdown (MCF)		Reference Meter Number		Volume Lost (MCF)	
Pipe ID (in)		Length (Feet)		Beginning Date & Time		Vent Duration (Hours)	
Begin Press. (PSIG)		End Press. (PSIG)		Ending Date & Time		Gas Temp	
Gas Temp.		Specific Gravity		Pipe ID (in)		Specific Gravity	
Elevation (ft)				Orifice Size (in)		Elevation (ft)	
				Avg Pressure			
Reference Meter Number		Blowdown (MCF)		Reference Meter Number		Volume Lost (MCF)	
Pipe ID (in)		Length (Feet)		Beginning Date & Time		Vent Duration (Hours)	
Begin Press. (PSIG)		End Press. (PSIG)		Ending Date & Time		Gas Temp	
Gas Temp.		Specific Gravity		Pipe ID (in)		Specific Gravity	
Elevation (ft)				Orifice Size (in)		Elevation (ft)	
				Avg Pressure			

Known (Station) VolumesVolumes must be known to calculate correctly!

Type of Blowdown	Number of Occurances	Known Volume (MCF) Blowdown	Volume (MCF)
		Multiplied by	
		Multiplied by	
		Multiplied by	

Total Volume (MCF):

4,111.47

Comments:

Residue blowdown due to off-spec (O2), 32.214210,-103.443883

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
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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

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

QUESTIONS

Action 382619

QUESTIONS

Operator: Targa Northern Delaware, LLC. 110 W. 7th Street, Suite 2300 Tulsa, OK 74119	OGRID: 331548
	Action Number: 382619
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2425544956
Incident Name	NAPP2425544956 ROJO TORO PURGE #1 @ 0
Incident Type	Natural Gas Release
Incident Status	Initial C-141 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 #1
Date Release Discovered	01/07/2024
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: 4,111 Mcf Recovered: 0 Mcf Lost: 4,111 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)	Not answered.

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QUESTIONS, Page 2

Action 382619

QUESTIONS (continued)

Operator: Targa Northern Delaware, LLC. 110 W. 7th Street, Suite 2300 Tulsa, OK 74119	OGRID: 331548
	Action Number: 382619
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

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.
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: Amber Groves Title: Environmental Specialist Email: agroves@targaresources.com Date: 09/11/2024
--	--

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QUESTIONS, Page 3

Action 382619

QUESTIONS (continued)

Operator: Targa Northern Delaware, LLC. 110 W. 7th Street, Suite 2300 Tulsa, OK 74119	OGRID: 331548
	Action Number: 382619
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Site Characterization	
<i>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.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Not answered.
What method was used to determine the depth to ground water	Not answered.
Did this release impact groundwater or surface water	Not answered.
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	Not answered.
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Not answered.
An occupied permanent residence, school, hospital, institution, or church	Not answered.
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Not answered.
Any other fresh water well or spring	Not answered.
Incorporated municipal boundaries or a defined municipal fresh water well field	Not answered.
A wetland	Not answered.
A subsurface mine	Not answered.
An (non-karst) unstable area	Not answered.
Categorize the risk of this well / site being in a karst geology	Not answered.
A 100-year floodplain	Not answered.
Did the release impact areas not on an exploration, development, production, or storage site	Not answered.

Remediation Plan	
<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>	
Requesting a remediation plan approval with this submission	No
<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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CONDITIONS

Action 382619

CONDITIONS

Operator: Targa Northern Delaware, LLC. 110 W. 7th Street, Suite 2300 Tulsa, OK 74119	OGRID: 331548
	Action Number: 382619
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

CONDITIONS

Created By	Condition	Condition Date
amaxwell	Gas Release not under 19.15.27/28 NMAC. Must meet all requirements of 19.15.29 NMAC	9/18/2024