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February 20, 2026

**New Mexico Energy, Minerals and Natural Resources Department**  
**1220 South St. Francis Drive**  
**Santa Fe, NM 87505**  
**Attn: Ms. Shanna Smith**

**Re: November 18, 2025 Email Response Letter**  
Targa Eunice Gas Plant  
Unit B (NW/4, NE/4), Section 3, Township 22 South, Range 37 East  
Eunice, Lea County, New Mexico 88231  
Application ID: 511936  
**NMOCD Incident ID: nLWJ1010460306**

Dear Ms. Smith:

Targa Midstream Services LLC (Targa) appreciates the opportunity to submit this response to the New Mexico Oil Conservation Division (NMOCD) email, dated November 18, 2025, for the above referenced site.

**OCD Comments:**

- **OCD records indicate that an approved Stage 1/2 Abatement Plan is not on file. Pursuant to 19.15.30 NMAC Targa Midstream Services LLC (Targa) must submit a Stage 1/2 Abatement Plan no later than February 20, 2026, that meets all of the requirements of 19.15.30.13 NMAC.**
- **Include historical soil data in Stage 1/2 Abatement Plan.**

**Targa Response:**

We appreciate the opportunity to discuss this site on our initial conference call with your team on November 6, 2025. As discussed in the meeting conducted on November 2025, Targa and Larson & Associates (Larson) met with Mr. Bradford Billings in person on February 20, 2018. A summary of that meeting appears in the 2018 Groundwater Monitoring Report (GWMR), Appendix A. As a result of the meeting and subsequent review of the 2017 Groundwater Monitoring Report, Mr. Billings had indicated that the delineation work completed to date met Stage 1 abatement requirements, and indicated the OCD considered the downgradient chloride delineation to the southeast sufficient. This was based on cross sectional analysis in the 2018 GWMR (Figures 4a, 4b) which suggest the water bearing unit thickness decreases significantly towards the southeast. Targa will include this information in the abatement plan submittal.

In addition, we have since discovered that any historic soil data generated by Targa's former consultant (Larson), is currently unavailable due to a cybersecurity incident involving unauthorized access to their files. Targa is actively working to recover historic information through alternative sources.

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Targa respectfully requests a 90-day extension to allow sufficient time to locate, compile, and summarize available historic soil data and complete remaining site activities in support of development of the Stage 1/ 2 abatement plan in accordance with 19.15.30.13 NMAC.

**OCD Comments:**

- All applicable wells will be quarterly analyzed for EPA Method 8260, EPA Method 8270, and chlorides.

**Targa Response:**

Targa will move to a quarterly sampling schedule in 2026.

**OCD Comment:**

- Clarify lat long for Eunice Gas Plant. Reported lat long does not match site location

**Targa Response:**

The Eunice Gas Plant is located southeast of the city of Eunice, Lea County, NM at 32°25'29.3" N, 103°08'50.1" W.

**OCD Comments:**

- Please be advised that OCD approval of this report does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment.

**Targa Response:**

Comment noted.

We appreciate the opportunity to provide this response and look forward to working with you on this project. If you should have any questions or comments regarding this response, please contact the undersigned at (713) 584-1396.

Sincerely,



Christina Higginbotham  
ES&H Supervisor

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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**

CONDITIONS

Action 556427

**CONDITIONS**

Operator: TARGA MIDSTREAM SERVICES LLC 811 Louisiana Street Houston, TX 77002	OGRID: 24650
	Action Number: 556427
	Action Type: [UF-GWA] Ground Water Abatement (GROUND WATER ABATEMENT)

**CONDITIONS**

Created By	Condition	Condition Date
shanna.smith	The OCD will approve a 60-day extension till May 8, 2026. At that time Targa and OCD can discuss another extension. Targa has already had 90 days to complete the Stage1/Stage 2 Abatement Plan.	2/23/2026