From: Yu, Olivia, EMNRD

To: "Higginbotham, Christina"

Cc: Mark Larson

Subject: RE: [EXTERNAL] FW: 1RP-4312 - Final Closure Approval

Date: Tuesday, February 27, 2018 9:12:00 AM
Attachments: approved\_1RP4312\_Final C-141 June 27 2017.pdf

## Dear Ms. Higginbotham:

The available information indicates **OPERATOR** has met the requirements of 19.15.29 NMAC and no further corrective action is required. NMOCD considers **1RP-4312** closed. This determination by the Oil Conservation Division does not relieve Operator of responsibility should future information indicate a threat to ground water, surface water, human health, or the environment. Furthermore, it does not relieve Operator of responsibility for compliance with any federal, state, or local laws and/or regulations.

Thanks,

Olivia Yu Environmental Specialist NMOCD, District I Olivia.yu@state.nm.us 575-393-6161 x113

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

**From:** Higginbotham, Christina [mailto:chigginbotham@targaresources.com]

**Sent:** Wednesday, February 14, 2018 1:06 PM **To:** Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us> **Cc:** Mark Larson <Mark@laenvironmental.com>

Subject: RE: [EXTERNAL] FW: 1RP-4312 - Final Closure Approval

Olivia,

We purchased 288 yards of Caliche and 240 yards of top soil to backfill the excavation. This material was purchased directly from the landowner, Mr. Dan Fields.

Also attached is the Final C-141 that we have on file.

Please let me know if you need any further information.



Christina Higginbotham, P.G. | Targa Resources | Sr. Environmental Specialist

811 Louisiana Street, Suite 2100, Houston, TX 77002 | office: (713) 584-1396 | cell: (281) 620-7835 email: <a href="mailto:chigginbotham@targaresources.com">chigginbotham@targaresources.com</a>

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]

Sent: Monday, February 12, 2018 5:04 PM

**To:** Higginbotham, Christina < <a href="mailto:chigginbotham@targaresources.com">chigginbotham@targaresources.com</a>>

**Cc:** Mark Larson < <u>Mark@laenvironmental.com</u>>

Subject: RE: [EXTERNAL] FW: 1RP-4312 - Final Closure Approval

Ms. Higginbotham:

Was the soil used for backfilling the excavation for 1RP-4312 of like, local material? Where was the source? The photo of the backfilled area in the document sent September 28, 2017- and aerial imagery- suggests that the backfill material is different from the soil in surrounding landscape.

Was a final C-141 previously submitted? The last page in the closure report still was marked initial on the C-141.

Thanks, Olivia

**From:** Higginbotham, Christina [mailto:chigginbotham@targaresources.com]

Sent: Monday, February 5, 2018 8:50 AM

To: Yu, Olivia, EMNRD < Olivia. Yu@state.nm.us>

Subject: RE: [EXTERNAL] FW: 1RP-4312 - Final Closure Approval

Good morning Olivia,

I would like to follow up with you on the final closure approval for the Townsend release, 1RP-4312. I believe our consultant had provided some additional information you had requested. Do you have any questions or do you need any additional information in order to formally close the site? It has been over a year since the backfill was completed and I would like to be able to close any open items on our end as well.

Thank you in advance, and please feel free to call me directly with any questions.

Christina Higginbotham



#### Christina Higginbotham, P.G. | Targa Resources | Sr. Environmental Specialist

811 Louisiana Street, Suite 2100, Houston, TX 77002 | office: (713) 584-1396 | cell: (281) 620-7835 email: <a href="mailto:chigginbotham@targaresources.com">chigginbotham@targaresources.com</a>

**From:** Mark Larson [mailto:Mark@laenvironmental.com]

**Sent:** Thursday, September 28, 2017 6:19 PM **To:** 'Yu, Olivia, EMNRD' < Olivia. Yu@state.nm.us>

**Cc:** Higginbotham, Christina <<u>chigginbotham@targaresources.com</u>>; Wrangham, Calvin W. <<u>CalvinWrangham@targaresources.com</u>>; Duncan, Randy <<u>RDuncan@targaresources.com</u>>; England, Ralph E. <<u>REngland@targaresources.com</u>>; Klein, Cindy S.

<CynthiaKlein@targaresources.com>

Subject: [EXTERNAL] FW: 1RP-4312 - Final Closure Approval

#### Dear Olivia,

Please accept the attached revised document which includes two (2) additional photographs taken on February 14, 2017 after excavation backfilling was completed. Please contact me if you have questions.

Mark

From: Mark Larson

Sent: Thursday, September 28, 2017 6:01 PM

To: 'Yu, Olivia, EMNRD'

Cc: 'Higginbotham, Christina'; 'Wrangham, Calvin W.'; 'Duncan, Randy'; 'England, Ralph E.'; 'Klein, Cindy

D.'

Subject: RE: 1RP-4312 - Final Closure Approval

#### Dear Ms. Yu,

This message is in response to your questions from September 22, 2017 and presented on behalf of Targa Midstream Services, LLC.

- 1. The GPS coordinates presented on page 1 of the remediation report (January 12, 2017) have been corrected to match the GPS coordinates presented on the drawings (N32° 56′ 51.49″ W103° 26′ 21.87″). The GPS coordinates presented on the drawings were collected near the northwest corner of the release area prior to remediation. The GPS coordinates presented in the report match closely with the GPS coordinates presented on the initial and final C-141. Please use the link below to download the corrected report;
- 2. Please refer to the attached scaled drawing (Figure 5) that shows the excavation boundary with arrows and numbers indicating the depth of the excavation at each arrow;
- 3. The excavation was backfilled at the landowner's request in August 2016 with caliche acquired from the landowner. Please refer to the attached photographs.

Link: https://files.acrobat.com/a/preview/fdbc2331-89f8-466b-92b8-ec02c48b289e

Please contact me if you have questions. Respectfully,

Mark J. Larson, P.G.
President/Sr. Project Manager
507 N. Marienfeld St., Suite 205
Midland, Texas 79701
Office – 432-687-0901
Cell – 432- 556-8656
Fax – 432-687-0456
mark@laenvironmental.com



"Serving the Permian Basin Since 2000" depths of areas

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]

Sent: Friday, September 22, 2017 1:25 PM

To: Mark Larson

Cc: 'Higginbotham, Christina'

Subject: RE: 1RP-4312 - Final Closure Approval

Mr. Larson:

Please address these concerns regarding the closure report for 1RP-4312:

- 1. There are discrepancies among the GPS coordinates written on page 1, the figures, and initial C-141.
- 2. Please provide an scaled map, table, or short summary indicating the various areas with different depths of excavation.
- 3. Has the entire excavated area been backfilled?

Thanks, Olivia

From: Mark Larson [mailto:Mark@laenvironmental.com]

**Sent:** Wednesday, September 20, 2017 3:38 PM **To:** Yu, Olivia, EMNRD < <u>Olivia.Yu@state.nm.us</u>>

**Cc:** 'Higginbotham, Christina' < <a href="mailto:chigginbotham@targaresources.com">chigginbotham@targaresources.com</a>>

Subject: FW: 1RP-4312 - Final Closure Approval

Hello Olivia,

I following up on the information requested for the above captioned project to see if you've reviewed and if we can expect closure approval. Please contact me if you have questions. Mark

From: Mark Larson

Sent: Monday, July 10, 2017 3:55 PM

**To:** 'Yu, Olivia, EMNRD' **Cc:** 'Higginbotham, Christina'

Subject: RE: 1RP-4312 - Final Closure Approval

#### Olivia,

Sorry for the delay in getting this to you. Please find attached email from Tomas plus a remediation summary dated December 15, 2015. Please contact me if you have questions.

Respectfully,

Mark J. Larson, P.G.
President/Sr. Project Manager
507 N. Marienfeld St., Suite 205
Midland, Texas 79701
Office – 432-687-0901
Cell – 432-556-8656
Fax – 432-687-0456
mark@laenvironmental.com



"Serving the Permian Basin Since 2000"

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]

**Sent:** Thursday, June 29, 2017 3:58 PM

To: Mark Larson

Subject: RE: 1RP-4312 - Final Closure Approval

Mark:

If you have any additional documents and communications related to 1RP-4312, please send them my way and I will try to review this release tomorrow.

Thanks, Olivia

**From:** Mark Larson [mailto:Mark@laenvironmental.com]

**Sent:** Thursday, June 29, 2017 1:52 PM

To: Yu, Olivia, EMNRD < Olivia. Yu@state.nm.us >; Oberding, Tomas, EMNRD

<<u>Tomas.Oberding@state.nm.us</u>>

Cc: 'McQuade, David' < DMcQuade@targaresources.com>; 'Wrangham, Calvin W.'

<<u>CalvinWrangham@targaresources.com</u>>; 'Higginbotham, Christina'

<a href="mailto:chigginbotham@targaresources.com">chigginbotham@targaresources.com</a>; 'Klein, Cindy D.' <a href="mailto:cynthiaKlein@targaresources.com">cynthiaKlein@targaresources.com</a>;

'Duncan, Randy' < <a href="mailto:RDuncan@targaresources.com">RDuncan@targaresources.com</a>; 'England, Ralph E.'

### <REngland@targaresources.com>

Subject: Re: 1RP-4312 - Final Closure Approval

### Olivia/Tomas,

On January 12, 2017, the email below and link were submitted to the New Mexico Oil Conservation Division (OCD) on behalf of Targa Midstream Services, LLC (Targa). The report documents remediation of the Townsend 16" pipeline release and requested approval to backfill the excavation. No response was received from OCD. In February 2017, the landowner, Dan Field, approved Targa for backfilling the excavation. Backfilling with clean soil (caliche) was completed on February 15, 2017. The attached letter with photo documentation and final C-141 is being submitted to the OCD to request final closure approval of remediation permit number 1RP-4312. It is Targa's understanding based on our last correspondence with Mr. Oberling and Ms. Lynch (prior to her departure) that this information may be needed for formal closure. Please contact Christina Higginbotham with Targa at (713) 584-1396 or me if you have questions.

Mark J. Larson, P.G.
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mark@laenvironmental.com



"Serving the Permian Basin Since 2000"

From: Michael Gant

Sent: Tuesday, June 27, 2017 4:26 PM

To: Mark Larson

Subject: FW: Townsend 16 Inch Pipeline

From: Michael Gant

**Sent:** Thursday, January 12, 2017 11:51 AM

To: 'tomas.oberding@state.nm.us'; 'Kristen.Lynch@state.nm.us'; 'McQuade, David'; Wrangham, Calvin

W.; 'Duncan, Randy'; Klein, Cindy D.; 'England, Ralph E'

Cc: Mark Larson

Subject: Townsend 16 Inch Pipeline

Hello all,

Below is a link to the Townsend 16 inch pipeline remediation report. The initial and final C-141s are included at the end of this report. Please review this report and feel free to contact Mark or myself if you have any questions or concerns. We can be reached at <a href="mark@laenvironmental.com">mark@laenvironmental.com</a> and <a href="mark@laenvironmental.com">mgant@laenvironmental.com</a>.

https://files.acrobat.com/a/preview/e0d6ee07-765d-414b-8e8f-ee2abe1296b1

Thank you,

# Michael Gant

Senior Geologist 432-664-5357



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