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Scope: Operations plan to take reasonable actions to prevent and minimize leaks or releases of natural gas from gathering pipeline systems. This plan applies to all natural gas gathering pipeline systems in New Mexico. Gas gathering lines subject to 49 CFR Part 192 will remain under the jurisdiction of New Mexico Public Regulatory Commission.

System Overview: Targa operates gas gathering lines constructed of steel and non-metallic material operating at pressures ranging from 15 PSIG to 1200 PSIG. Construction dates of the pipelines range from undetermined to present day. Gas composition is both sweet and sour up to 185800 ppm. Most gas gathering lines are not regulated under 49 CFR 192 and do not fall under the jurisdiction of PHMSA or NMPRC.

Requirement: 7 Title 19 Natural Resources and Wildlife, Chapter 15 Oil and Gas, Part 28 Natural Gas Gathering Systems, 19.15.28.8 (C) Performance Standards

Definitions:

AVO	means Audio, Visual and Olfactory. Hear, see or smell leaks/releases/emissions.
Emergency	means a temporary, infrequent, and unavoidable event in which the loss of natural gas is uncontrollable or necessary to avoid a risk of an immediate and substantial adverse impact on safety, public health or the environment, but does not include an event arising from or related to:
	1 the operator's failure to install appropriate equipment of sufficient capacity to accommodate the anticipated or actual rate and pressure of the natural gas gathering system;
	2 the operator's failure to limit the gathering of natural gas when the volume of natural gas exceeds the capacity of the natural gas gathering system;
	3 scheduled maintenance;
	4 unscheduled maintenance or a malfunction that results in venting or flaring of natural gas by an upstream operator for which the operator fails to comply with Paragraph (2) of Subsection D of 19.15.28.8 NMAC;
	5 the operator's negligence;
	6 recurring equipment failure; 4 or more times within a single reporting area within the preceding 30 days pursuant to Subsection (A) of 19.15.28.10 NMAC; or
	7 Four or more emergencies within a single reporting area pursuant to Subsection A of 19.15.28.10 NMAC experienced by the operator within the preceding 30 days, unless the division determines the operator could not have reasonably anticipated the current event and it was beyond the operator's control.
Flare or Flaring	means the controlled combustion of natural gas in a device designed for that purpose.
Flare Stack	means a device equipped with a burner used to flare natural gas
Gathering Pipeline	means a pipeline that gathers natural gas within a natural gas gathering system.
Natural Gas	means a gaseous mixture of hydrocarbon compounds, primarily composed of methane, and includes both casinghead gas and gas as those terms are defined in 19.15.2 NMAC.

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Natural Gas Gathering System	means the gathering pipelines and associated facilities that compress, dehydrate or treat natural gas after the custody transfer point and ending at the connection point with a natural gas processing plant or transmission or distribution system.
NMOCC or OCC	New Mexico Oil Conservation Commission
Vent	means the release of uncombusted natural gas to the atmosphere.
Waste	Leak or release from a natural gas gathering pipeline system.

Submission to OCD – Targa will file this plan with the Division:

- For a natural gas gathering system placed into service after May 25, 2021, within 60 days following the date the natural gas gathering system is placed into service;
- For a natural gas gathering system in place on or before May 25, 2021, within 90 days following May 25, 2021; and
- For a natural gas gathering system to which the operator added a new gathering pipeline during the calendar year or changed the operations plan, an updated operations plan no later than March 31 of the following year.

Routine Operations & Maintenance:

Targa will resolve emergencies as quickly and safely as feasible to minimize waste.

Targa will take reasonable actions to minimize leaks or releases from gas gathering systems and make repairs when a pipeline leak is discovered. Reasonable actions include the following:

- Follow Damage Prevention/One Call/Line Locating requirements to prevent third party damage to natural gas gathering pipelines.
- Follow line marker requirements that show approximate location of underground pipelines where appropriate (road crossings, structures are near)
- Follow patrolling practices visually looking for ROW activity or leaks.

AVO Inspections:

- Perform weekly AVO inspections of compressor, dehydrators & treatment facilities associated with natural gas gathering systems to confirm components are operating properly and there are no leaks or releases except as allowed in Subsection B of 19.15.28.8 NMAC.
- AVO inspections include:
 - Targa shall inspect all components, including flare stacks, thief hatches, closed vent systems, pumps, compressors, pressure relief devices, valves, lines, flanges, connectors, and associated piping to identify defects, leaks, and releases by:
 - a comprehensive visual inspection;
 - listening for pressure and liquid leaks; and
 - smelling for unusual and strong odors.
 - Targa shall make and keep a record of an AVO inspection for no less than five years and make such records available for inspection by the division upon request.
 - Subject to the division's prior written approval, the operator may use a remote or automated monitoring technology to detect leaks and releases in lieu of an AVO inspection.

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Annual Survey:

- Targa shall perform an annual monitoring (once per calendar year not to exceed 15 months) of the entire length of a gathering pipeline using an AVO technique, ALARM technology, aerial visual inspections, or other valid method to detect leaks and releases. Targa will record and provide upon to the OCC upon request the data and time of the monitoring, method and/or technology used. Records will be maintained for at least 5 years. Personnel conducting inspections shall be knowledgeable on the methods and technology being used.

Cathodic Protection, Corrosion Control & Liquids Management:

- Follow external cathodic protection practices if the pipeline is designed to accommodate adequate protection (CP surveys, rectifier/bond inspections)
- Follow internal corrosion practices if the line can accommodate monitoring or inhibitor injection.
- Follow maintenance pigging activities if beneficial for lines that can accommodate and have sufficient flow.

Procedures to Reduce Releases:


Venting/Blowdowns:

- For scheduled maintenance, replacement, or repair of a new or existing natural gas gathering system, Targa shall not vent natural gas during blowdown and shall route natural gas to a flare stack which complies with the flare stack standards, inspection, and recordkeeping requirements in Subsection E of 19.15.27.8 NMAC. Maintenance pigging is exempted from flaring, but blowdown volume counts towards loss. (see 19.15.28.8.B.2.j)
- For unscheduled maintenance, replacement or repair of a new or existing natural gas gathering system, to the extent that it is technically feasible and would not pose a risk to safe operations or personnel safety, the operator shall not vent natural gas during blowdown and shall route natural gas to a flare stack which complies with the flare stack standards, inspection and recordkeeping in Subsection E of 19.15.27.8 NMAC.

Reporting/Notification Requirements:

Upstream Operator Reporting

- Provide written notification to each upstream operator no less than 14 days prior to the date of scheduled maintenance, replacement or repair of a natural gas gathering system. Include the date and expected duration of the outage.
- Provide verbal notification to each upstream operator as soon as possible but no later than 12 hours after discovery of an emergency or malfunction, or the need for unscheduled maintenance. Include the date and expected duration of the outage. Document the notification including date, time, person and telephone number within 24 hours.
- Keep notification records for 5 years.

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Agency Reporting

Venting or Flaring

- Exceeds 50 MCF in volume
 - Results from an emergency or malfunction, or
 - Any event (including maintenance) that lasts 8 hours or more in a 24-hour period from a single event
 - File form C-129
- Exceeds 50 MCF but less than 500 MCF from a single event
 - file C-129 no later than 15 days after discovery or commencement of venting or flaring
- Exceeds 500 MCF from a single event
 - Notify the division verbally or by email as soon as practical but no later than 24 hours following discovery or commencement of venting or flaring and provide the information required on form C-129
 - File form C-129 no later than 15 days following the discovery or commencement of venting or flaring
 - File form C-129 no later than 15 days following the termination of venting or flaring
- File a Form C-141 for a release that includes liquid during venting or flaring that is or maybe a major or minor release (Get volumes from 19.15.29.7)

Monthly Reporting of vented and flared natural gas

- Effective 10/1/21
 - Quarterly Reporting due 2/15/22 for Q4 2021 and 5/15/22 for Q1 2022
- Effective 4/1/22
 - Submit Monthly Report by submitting form C-115B due the 15th day of the 2nd month following the month being reported
 - Report per prescribed methods in 19.15.27.8G(2)

Emergency Response:

- Follow Emergency Response practices for releases that require immediate response and isolation of the release.

Repairs:

- Repair all leaks upon discovery or isolate pipelines no longer in service (i.e. dead legs).
- Repairs will be made using common industry practices for clamps and replacements.
- Any replaced pipe will be pressure tested.

Design & Construction:

Any facility constructed after May 25, 2021, shall be designed and constructed to minimize waste.

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
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

QUESTIONS

Action 43336

QUESTIONS

Operator: TARGA MIDSTREAM SERVICES LLC 1000 Louisiana Houston, TX 77002	OGRID: 24650
	Action Number: 43336
	Action Type: [NGGS] NGGS Operations Plan (NGGS-OP)

QUESTIONS

Verification	
Does the operator own the selected facility	Yes
Is the selected facility a natural gas gathering system	Yes

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ACKNOWLEDGMENTS

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ACKNOWLEDGMENTS

<input checked="" type="checkbox"/>	I certify that, after reasonable inquiry, the statements in and attached to this Natural Gas Gathering System Operations Plan are true and correct to the best of my knowledge and acknowledge that a false statement may be subject to civil and criminal penalties under the Oil and Gas Act.
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