

From: [Gant, Michael](#)
To: [Harimon, Jocelyn, EMNRD](#); MGant@lucid-energy.com
Subject: RE: [EXTERNAL] Regarding application ID 145756, Incident # NAPP2217440482 TROJAN HORSE PIG RECEIVER
Date: Wednesday, December 14, 2022 12:05:11 PM
Attachments: [image002.png](#)

Good Afternoon Jocelyn,

I can confirm that there was no impact to soil from this event. This flash fire event was the result of natural gas quickly igniting during normal maintenance operations when blowing down excess pressure at the pig receiver of the compressor station. The Lucid safety team determined that the ignition was caused by static electric discharge when the pipeline technician returned for a tool from his vehicle.

There were no liquids released during the blowdown event nor during the flash fire. As part of Lucid's incident investigation, Lucid EHSR performed field screening with a calibrated PID on soil samples that were collected from around the pig receiver to check for hydrocarbon presence. We also used an EC meter and Hach Quantab strips to check for chlorides presence in the soil samples. All field screening results were non-detect for hydrocarbons and chlorides and we did not send soil samples to the laboratory for further analysis.

Please feel free to contact me if you have additional questions or concerns.

Thanks,

Michael Gant

Environmental Compliance Manager



Targa Resources

3100 McKinnon St. #800

Dallas, TX 75201

+1(314) 330 7876 Cell

mgant@targaresources.com | <https://www.targaresources.com/>

From: Harimon, Jocelyn, EMNRD <Jocelyn.Harimon@emnrd.nm.gov>
Sent: Wednesday, December 14, 2022 12:43 PM
To: MGant@lucid-energy.com
Subject: [EXTERNAL] Regarding application ID 145756, Incident # NAPP2217440482 TROJAN HORSE PIG RECEIVER

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Regarding application ID 145756, Incident # NAPP2217440482 TROJAN HORSE PIG RECEIVER

Can you please confirm that there was no soil impact for this release and describe how it was determined that no soil was impacted from this release.

Thank you for your assistance,
Jocelyn Harimon

Jocelyn Harimon • Environmental Specialist
Environmental Bureau
EMNRD - Oil Conservation Division
1220 South St. Francis Drive | Santa Fe, NM 87505
(505)469-2821 | Jocelyn.Harimon@emnrd.nm.gov
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From: [Harimon, Jocelyn, EMNRD](#)
Sent: Friday, September 23, 2022 10:09 AM
To: [Gant, Michael](#)
Subject: RE: [EXTERNAL] NAPP2217440482 Trojan Horse incident

Thank you Michael for the update.

JH

Jocelyn Harimon • Environmental Specialist
Environmental Bureau
EMNRD - Oil Conservation Division
1220 South St. Francis Drive | Santa Fe, NM 87505
(505)469-2821 | Jocelyn.Harimon@state.nm.us
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From: Gant, Michael <mgant@targaresources.com>
Sent: Friday, September 23, 2022 9:07 AM
To: Harimon, Jocelyn, EMNRD <Jocelyn.Harimon@emnrd.nm.gov>
Subject: [EXTERNAL] NAPP2217440482 Trojan Horse incident

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Good Morning Jocelyn,

I wanted to update you regarding this incident, NAPP2217440482 Trojan Horse fire, as the OCD is due a closure report.

On 6/22/2022 a fire occurred at the Trojan Horse Compressor Station pig receiver at these coordinates, 32.236654, -104.091309. The primary cause of this incident was determined to be due the gas released during normal pig receiving operations. The gas released was then ignited by static electricity from the nearby operator's vehicle. The fire was immediately extinguished with a fire extinguisher. This incident only resulted in a gas loss and fire with no liquids released to atmosphere or surrounding surface. The fire damaged only the piping and pig receiver, with no damage to surrounding vegetation.

Targa, previously Lucid Energy, would like to request closure for this incident and will provide a C141 closure form through the OCD portal.

Please let me know if you require any additional information.

Thanks,

Michael Gant

Environmental Compliance Manager



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1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural
Resources Department

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	NAPP2217440482
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party Lucid Energy Delaware, LLC.	OGRID 372422
Contact Name Michael Gant	Contact Telephone 3143307876
Contact email MGant@lucid-energy.com	Incident # (assigned by OCD)
Contact mailing address 3100 McKinnon St #800, Dallas, TX 75201	

Location of Release Source

Latitude 32.236654° Longitude -104.091309°
(NAD 83 in decimal degrees to 5 decimal places)

Site Name Trojan Horse pig receiver	Site Type Natural gas pipeline/ pig receiver
Date Release Discovered 6/22/2022	API# (if applicable)

Unit Letter	Section	Township	Range	County
B	9	24S	28E	Eddy

Surface Owner: ☐ State ☐ Federal ☐ Tribal ☒ Private (Name: _____)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Natural Gas	Volume Released (Mcf) 3 MCF	Volume Recovered (Mcf) 0 MCF
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release The fire was caused by static discharge igniting the natural gas that was blown down before removing the pig from the receiver.

Incident ID	NAPP2217440482
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? This is a major release due to the combustion of natural gas and resulting fire incident.
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? Immediate notice was not provided to OCD, as Lucid did not have immediate and accurate details of the incident. Once details had been confirmed Lucid EHSR immediately notified OCD on 6/23/22 via OCD online NOR form.	

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why: 	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
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.	
Printed Name: <u>Michael Gant</u>	Title: <u>Environmental Compliance Manager</u>
Signature: <u></u>	Date: <u>6/23/2022</u>
email: <u>MGant@lucid-energy.com</u>	Telephone: <u>3143307876</u>
<u>OCD Only</u> Received by: <u>Jocelyn Harimon</u> Date: <u>06/23/2022</u>	

Incident ID	NAPP2217440482
District RP	
Facility ID	
Application ID	

Closure


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 (electronic submittals in .pdf format are preferred) 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.

Closure Report Attachment Checklist: *Each of the following items must be included in the closure report.*

- ☐ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☐ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☐ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☐ Description of remediation activities

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.

Printed Name: Michael Gant Title: Environmental Compliance Manager

Signature:  Date: 9/23/2022

email: mgant@targaresources.com Telephone: 3143307876

OCD Only

Received by: Jocelyn Harimon Date: 12/14/2022

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by:  Date: 12/14/2022
Printed Name: Jocelyn Harimon Title: Environmental Specialist

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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

CONDITIONS

Action 145756

CONDITIONS

Operator: LUCID ENERGY DELAWARE, LLC 201 S. Fourth Street Artesia, NM 88210	OGRID: 372422
	Action Number: 145756
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
jharimon	None	12/14/2022