

From: [Egan, Kerry L](#)
To: [Maxwell, Ashley, EMNRD](#); [Smith, Cory, EMNRD](#)
Cc: [Egan, Kerry L](#)
Subject: RE: [EXTERNAL] Transwestern Pipeline Company (OGRID #23435): Incident No nJMW1326840258
Date: Monday, January 27, 2025 11:36:13 AM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[Engineering Workbook_Gas Volume.xlsx](#)
[SKM_C550i25012711260.pdf](#)

Ashley,

Good morning. Apologies for the delayed response I had to bring in some outside assistance regarding the formulas. Talking with our measurement team, it appears that Gas Loss application has been in place for a very long time. No one seems to have access to the source code to be able to take a screenshot of the calculations being run. They were able to walk me through formulas that they believe are being used in the applications, as those are fairly standard. Our measurement team was able to provide a standalone spreadsheet that will do similar (if not the exact same) calculations.

Using the same input values we're getting a very similar result. The volume calculated in the Gas Loss Application was 21,569 Mcf. The volume calculated by the spreadsheet is 21,177.8 Mcf.

Talking with Measurement, they believe the minor difference in calculated volume would be due to discrepancies in the constant values used in the spreadsheet and the Gas Application. As that application is pretty old (20+ years), none of the GPA provided constants for factors such as molecular weight, volume to mass ratio, or compressibility would have been updated.

I did go through the exercise of running through the calculations by hand. I'm attaching this for reference.

Please let me know how you would like me to proceed. If you'd like me to update the submittal of the written request to update the reported amount with the value from the spreadsheet, I can do that.

Let me know if you have any questions.

I greatly appreciate your time, patience, and assistance on this matter.

Respectfully,

Mr. Kerry Egan
Sr. Environmental Specialist
Energy Transfer
O: 505-260-4023

M: 575-808-9402

8501 Jefferson St NE,
Albuquerque, NM 87113



From: Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>
Sent: Thursday, January 16, 2025 12:58 PM
To: Egan, Kerry L <kerry.egan@energytransfer.com>; Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>
Subject: RE: [EXTERNAL] Transwestern Pipeline Company (OGRID #23435): Incident No nJMW1326840258

Kerry,

If you are unable to get the formula exported, handwritten formulas will work.

Ashley Maxwell • Environmental Specialist
Environmental Bureau Projects Group
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1000 Rio Brazos Road | Aztec, NM 87110
505.635.5000 | Ashley.Maxwell@emnrd.nm.gov
<http://www.emnrd.state.nm.us/OCD/>

Effective 12/1/2024: OCD has updated guidance on karst potential occurrence zones. This notice can be found at: <https://www.emnrd.nm.gov/oed/oed-announcements-and-notifications/> under “2024 OCD ANNOUNCEMENTS AND NOTIFICATIONS”.

The Digital C-141 guidance documents can be found at <https://www.emnrd.nm.gov/oed/oed-announcements-and-notifications/> or <https://www.emnrd.nm.gov/oed/oed-forms/>.

From: Egan, Kerry L <kerry.egan@energytransfer.com>
Sent: Thursday, January 16, 2025 10:24 AM
To: Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>; Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>
Subject: RE: [EXTERNAL] Transwestern Pipeline Company (OGRID #23435): Incident No nJMW1326840258

Ashley,

Good morning. I did follow up and it doesn't appear that there's really an export function in the gas loss application. They were able to provide me with a screen shot of the application with the information used to complete the calculation. Please see the attachment.

If this is still not acceptable, I can continue working to try and get you gas loss spreadsheet showing the actual formulas used to complete the calculations.

Please let me know what you think.

Regards,

Mr. Kerry Egan

Sr. Environmental Specialist
Energy Transfer
O: 505-260-4023
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8501 Jefferson St NE,
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From: Egan, Kerry L

Sent: Thursday, January 16, 2025 7:43 AM

To: Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>; Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>

Subject: RE: [EXTERNAL] Transwestern Pipeline Company (OGRID #23435): Incident No nJMW1326840258

Good morning,

I received the volume calculation from our measurement group (see attached email). They use an application to do the calculations. I'm not sure if that's something that can be exported into a .csv file or some other readable format. At a minimum I can ask them if they'll take a screenshot of the application with all the information included. Would that suffice?

The map from Google Earth was included as an attachment in the original submission. If need be I can work with our GIS team to put it in a more formalized map, with a border and title block.

I will follow up with this information as soon as I can. Please let me know if you need anything else.

Regards,

Mr. Kerry Egan

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From: Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>
Sent: Thursday, January 16, 2025 7:13 AM
To: Egan, Kerry L <kerry.egan@energytransfer.com>; Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>
Subject: RE: [EXTERNAL] Transwestern Pipeline Company (OGRID #23435): Incident No nJMW1326840258

Good Morning Kerry,

Thanks for the information. Can you attach the actual calculations used to determine the volume? Also, we are unfortunately unable to upload KMZ files to the system. Can you pdf the map including the scale?

Let me know if you have any questions.

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The Digital C-141 guidance documents can be found at <https://www.emnrd.nm.gov/ocd/ocd-announcements-and-notifications/> or <https://www.emnrd.nm.gov/ocd/ocd-forms/>.

From: Egan, Kerry L <kerry.egan@energytransfer.com>
Sent: Tuesday, January 14, 2025 3:11 PM
To: Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>; Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>
Cc: Egan, Kerry L <kerry.egan@energytransfer.com>
Subject: RE: [EXTERNAL] Transwestern Pipeline Company (OGRID #23435): Incident No nJMW1326840258

Ashley,

Good afternoon. I have prepared the request as directed. I believe I've covered every item you requested, but if you feel like any additional information is needed, please let me know. I'm also attaching a KMZ of the line and the location of the valves for your benefit/use. I use Google Earth extensively as it's very useful, hopefully this is beneficial to you as well.

Again, I greatly appreciate your time and assistance on this matter. Don't hesitate to reach out with any questions.

Respectfully,

Mr. Kerry Egan
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Albuquerque, NM 87113



From: Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>

Sent: Friday, January 10, 2025 7:19 AM

To: Egan, Kerry L <kerry.egan@energytransfer.com>; Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>

Subject: RE: [EXTERNAL] Transwestern Pipeline Company (OGRID #23435): Incident No nJMW1326840258

Good Morning Kerry,

Please combine the following information into a PDF document: An executive summary of events including the discovery of the typo, a request to change the volume released and the reason for the request, state why no liquids were present in the line, and volume calculations for the release, a current gas analysis, a map showing the distance between the valves, and a copy of the email correspondence with OCD.

Once you have these documents combined, please email the pdf document. I will then update the volume of the release and manually upload the document to the incident file.

Let me know if you have any questions.

Thanks,
Ashley

Ashley Maxwell • Environmental Specialist
Environmental Bureau Projects Group
EMNRD - Oil Conservation Division

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From: Egan, Kerry L <kerry.egan@energytransfer.com>
Sent: Thursday, January 9, 2025 12:50 PM
To: Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>; Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>
Subject: RE: [EXTERNAL] Transwestern Pipeline Company (OGRID #23435): Incident No nJMW1326840258

Ashley/Corey,

Good afternoon. Hope you are off to a great start to the New Year.

I just wanted to follow up on this item that we'd been working on in December, to see if you had any additional questions for me?

If so, let me know and I'll get back to you immediately.

Regards,

Mr. Kerry Egan
Sr. Environmental Specialist
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M: 575-808-9402

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From: Egan, Kerry L <kerry.egan@energytransfer.com>
Sent: Friday, December 20, 2024 10:25 AM
To: Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>; Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>
Cc: Egan, Kerry L <kerry.egan@energytransfer.com>
Subject: RE: [EXTERNAL] Transwestern Pipeline Company (OGRID #23435): Incident No

nJMW1326840258

Ashley,

Good morning. Not a problem at all, thank you very much for working with me on this.

Speaking with Operations personnel, this line is generally pigged on an annual basis. The line, and the entire Transwestern Pipeline system, is categorized as interstate gas transmission. The gas being moved is post processing and very dry (>95% Methane + Ethane) and minimal amount of liquids are collected.

Operations did not recall or have records to indicate the line was pigged specifically for this project. If it had been, the liquids would have been collected at the next downstream compressor station.

The site of the blowdown WTL Valve 109, does not have a pig launcher/receiver, so no liquids were present at the blowdown location. No liquids were released during the blowdown.

As this is a remote location, not at a compressor station, the gas was vented directly to the atmosphere during the blow down.

Please let me know if this answers your questions, and if any others come up.

I greatly appreciate your time and assistance with this.

Regards,

Mr. Kerry Egan
Sr. Environmental Specialist
Energy Transfer
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M: 575-808-9402

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From: Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>

Sent: Friday, December 20, 2024 7:27 AM

To: Egan, Kerry L <kerry.egan@energytransfer.com>; Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>

Subject: RE: [EXTERNAL] Transwestern Pipeline Company (OGRID #23435): Incident No nJMW1326840258

Good Morning Kerry,

I apologize for the delayed response. To better understand the release, approximately how

frequently is the line pigged? Do you know if any liquids were present during the blow down? Lastly, was the release vented directly to the atmosphere?

Ashley Maxwell • Environmental Specialist
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From: Egan, Kerry L <kerry.egan@energytransfer.com>
Sent: Tuesday, December 17, 2024 3:13 PM
To: Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>; Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>
Cc: Egan, Kerry L <kerry.egan@energytransfer.com>
Subject: [EXTERNAL] Transwestern Pipeline Company (OGRID #23435): Incident No nJMW1326840258

Some people who received this message don't often get email from kerry.egan@energytransfer.com. [Learn why this is important](#)

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Ashley/Cory,

Good afternoon. Apologies for reaching out, out of the blue, but I'm needing some assistance with a unique situation. It has come to my attention that there was an erroneous release reported back in 2012 by Transwestern Pipeline Company (Transwestern). The incident number is nJMW1326840258.

I'm seeking assistance and guidance on how we can correct the error in the release report. I've never had to go back and try to correct information on a C-141 this far after the fact. I'm unsure how to achieve this, or what you would need from me to complete this.

For some background, there was indeed a gas release from Transwestern's pipeline in October of 2012, that was related to a maintenance activity to replace a mainline valve. As this was a mainline valve, a section of pipeline had to be isolated and blown down.

The volume of release reported on the C-141 (attached) was 21,031,567 Mcf, which is inaccurate.

21,031,567 Mcf equates to 21 billion cubic feet (Bcf). It is physically impossible to have released this volume of gas from the Transwestern system. The entire system, from west Texas and the panhandle all the way to California, at Maximum Operating Pressure has a line pack with less than 1/3 of that volume. There is no scenario in which 21 Bcf could have been released.

It appears that it was a simple mistake of using incorrect units, it should have been reported as “scf” and not “Mcf”.

Working with operations personnel and the PM for this project, we were able to locate the exact file to verify the details.

In early October of 2012, a section of the West Texas Lateral was isolated at WTL Valve 109 on the south end (33.094044, -104.209874) and WTL Valve 112 on the north end (33.281185, -104.355088). These were the nearest isolation valves upstream and downstream of the valve to be replaced, WTL Valve 110. The section of pipe blown down was 30.48 miles in length, with 24” OD and 0.313” wall thickness. The line pressure was reduced as low as it could be, using downstream compression, approximately 615 psi, prior to blowing down at WTL Valve 109. Using these dimensions and pressure, and a reasonable assumption of the gas temperature being between 60F – 75F, we calculate a gas loss of 21 million scf. This supports our assertion that there was a simple typographical error of reporting the volume in Mcf, instead of scf.

We feel it critical to correct the record and NMOCD’s database given the significant discrepancy.

Please review at your earliest convenience and let me know how we could go about doing this.

I greatly appreciate your time and assistance on this matter. Please feel free to reach out to me if you have any questions or wish to discuss, my cell phone is the best option.

Respectfully,

Mr. Kerry Egan

Sr. Environmental Specialist
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8501 Jefferson St NE,
Albuquerque, NM 87113



Private and confidential as detailed [here](#). If you cannot access hyperlink, please e-mail sender.

Help

Blowdown Calculations

Event: 8 - 110

Pressure prior to blowdown (P): 615 psig
 Atmospheric Pressure (Pa): 14.7 psig
 Compressibility (Z): 0.95
 Gas temperature (T): 60 °F
 Specific Gravity (G): 0.6
 Cost of gas: 2 \$/MSCF

Valve Type
☒ Ball
☐ Plug

Ball Valve Size: 8
 Ball Valve Rating: 600#
 Cv: 10000
 Blowdown Time: 73.92 hours

Build a table of the piping components that were involved in the blowdown.

Seg Num	Outside Dia(In)	Wall Thick(In)	Inside Dia (In)	Length (Miles)	Length (Feet)	Total Len (Ft)	Piping Description	Volume (MSCF)
1	24	0.313	23.374	30.48	0	160,934	wtl	21,569.0

Total cost of gas lost is \$43,137.95

160,934

Total gasloss: 21,569.0

Add Piping

Print

Okay

Cancel

Pipeline pressure prior to blowdown in psig
 Released to Imaging: 1/28/2025 9:50:58 AM

Gas Vol

Volume of Gas									
Starting Pressure in psig =		615		Total Volume in MCF =		21,177.8			
Ending Pressure in psig =		0							
Pipe OD in inches =		24		Gas Value =		\$79,629			
									21177.82166
Pipe Wall Thickness inches =		0.313							21633.40297
Length in Feet =		160,934							21633.40297
Price per MCF =		\$3.76							455.5813061
Pipe Size		OD		Pipe Size		OD			
2	=	2.375		12	=	12.75			
2 1/2	=	2.875		14	=	14			
3	=	3.5		16	=	16			
3 1/2	=	4		18	=	18			
4	=	4.5		20	=	20			
5	=	5.563		24	=	24			
6	=	6.625		30	=	30			
8	=	8.625		36	=	36			
10	=	10.75		42	=	42			



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Customer _____
 Job _____
 Date _____
 Subject _____
 Prepared By _____

$$1) \pi \cdot \left[\frac{\left(\frac{OD}{2} - ID \right)}{12} \right]^2 = 3.1416 \cdot \left[\frac{\frac{24}{2} - 0.313}{12} \right]^2 = 2.9799 \text{ ft}^2$$

$$2) 2.9799 \text{ ft}^2 \cdot 160,943 \text{ ft} = 479,594.05 \text{ ft}^3$$

$$3) 479,594.05 \text{ ft}^3 \cdot \frac{(615 \text{ psig} + 14.65)}{14.65} = 20,612,723.1 \text{ ft}^3$$

$$4) 20,612,723.1 \text{ ft}^3 \cdot ((0.00016194 \cdot 615) + 0.95) = 21,634,471.9 \text{ ft}^3$$

$$5) 21,634,471.9 \text{ ft}^3 \cdot \frac{1 \text{ Mcf}}{1000 \text{ ft}^3} = \cancel{21,634,471.9} 21,634.47 \text{ Mcf}$$

Starting Volume: 21,634.47 Mcf

$$1) 3.1416 \cdot \left[\frac{\frac{24}{2} - 0.313}{12} \right]^2 = 2.9799 \text{ ft}^2$$

$$2) 2.9799 \text{ ft}^2 \cdot 160,943 \text{ ft} = 479,594.05 \text{ ft}^3$$

$$3) 479,594.05 \text{ ft}^3 \cdot \frac{(0 + 14.65)}{14.65} = 479,594.05 \text{ ft}^3$$

$$4) 479,594.05 \text{ ft}^3 \cdot ((0.00016194 \cdot 0) + 0.95) = 455,614.35 \text{ ft}^3$$

$$5) 455,614.35 \text{ ft}^3 \cdot \frac{1 \text{ Mcf}}{1000 \text{ ft}^3} = 455.6 \text{ Mcf}$$

Starting Volume: 21,634.47 Mcf

Ending Volume: 455.6 Mcf

Gas Loss: 21,179 Mcf

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/oed/contact-us>

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
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CONDITIONS

Action 425686

CONDITIONS

Operator: TRANSWESTERN PIPELINE COMPANY P.O. Box 1188 Houston, TX 772511188	OGRID: 23435
	Action Number: 425686
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

Created By	Condition	Condition Date
amaxwell	Volume of release updated.	1/28/2025