



January 28, 2026

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

Re: November 24, 2025 Email Response Letter
Targa Monument Gas Plant
SW1/4 S36 T19S R36E
Monument, Lea County, New Mexico 88265
NMOCD Incident ID: nAUTOfGP000137

Dear Ms. Smith:

Ensolum, LLC (Ensolum), on behalf of Targa Midstream Services LLC (Targa), appreciates the opportunity to submit this response to the New Mexico Oil Conservation Division (NMOCD) email, dated November 24, 2025, for the above referenced site.

Ensolum offers the following response(s) to the NMOCD email:

The OCD has approved the submitted Ground Water Abatement (GROUND WATER ABATEMENT), for incident ID (n#) nAUTOfGP000137, with the following conditions:

- OCD records indicate that an approved Stage 1/2 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 January 30, 2026, that meets all of the requirements of 19.15.30.13 NMAC. A Stage 2 Abatement Plan dated February 12, 2020 has never been finalized.***

Ensolum Response:

The Stage 2 Abatement Plan was initially emailed to Mr. Bradford Billings on February 11, 2020. A revised Stage 2 Abatement Plan (April 12, 2022) based on discussions with Mr. Billings was initially emailed, then uploaded to the OCD portal in November 2022 per OCD request. This Stage 2 Abatement Plan was later rejected on October 19, 2023 by Mr. Michael Buchanan. A response to Mr. Buchanan was submitted on June 4, 2024. An email from Mike Buchanan dated January 3, 2025 indicated OCD had requested and was awaiting EPA Region 6 Climax facility information (upgradient and near the site), among other general questions. OCD indicated they would schedule a meeting to discuss the abatement plan. Based on correspondence in Targa's subsequent meeting on January 21, 2025 with Mr. Buchanan of the NMOCD, Ensolum also planned to request and include historical Climax Chemical Company data upon receipt (FOIA request submitted Tuesday, January 21, 2025) along with aquifer characterization data. Based on Ensolum's last correspondence with the EPA, the deadline was April 22, 2025 for the first partial response with rolling response productions every 30 days thereafter, until the request could be completed. However, only limited information has been received from EPA to date. Ensolum proposes to proceed with a third revision of the Stage 2 Abatement Plan, but are requesting a 30-day extension, for a new due date of February 27, 2026.

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- **Transition from submitting semi-annual monitoring and sampling reports to submitting quarterly monitoring and sampling reports. Operator may request to reduce reporting based upon future results.**
- **All applicable site wells will be analyzed for BTEX EPA Method 8260, sulfates, chlorides and Total Dissolved Solids (TDS). Submit 2025 AGWMR by April 1, 2026.**

Ensolum Response:

Based on the historical data going back to 2013 as well as dissolved phase plume delineation and demonstrated stability, Ensolum, on behalf of Targa, proposes to continue semi-annual groundwater monitoring, as indicated in the *2024 Annual Groundwater Monitoring Report* (dated November 11, 2025). Ensolum will update the analytical to include BTEX EPA Method 8260, sulfates, chlorides and TDS in the April 2026 semi-annual sampling event. The 2025 AGWMR will be submitted by April 1, 2026.

- **Monthly LNAPL abatement.**

Ensolum Response:

During the last groundwater monitoring event, October 21, 2025, MW-10 and MW-18 both contained light non-aqueous phase liquids (LNAPL) at a thickness of 0.26 feet. Due to the minimal amount of measurable LNAPL, Ensolum proposes hand bailing to coincide with semi-annual groundwater monitoring events. Additionally, Ensolum will install oil-only absorbent well socks in the monitoring wells with measurable LNAPL (MW-10 and MW-18). The absorbent socks will be changed during the semi-annual groundwater monitoring events as needed.

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 either of the undersigned.

Sincerely,
Ensolum, LLC



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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 547926

CONDITIONS

Operator: TARGA MIDSTREAM SERVICES LLC 811 Louisiana Street Houston, TX 77002	OGRID: 24650
	Action Number: 547926
	Action Type: [UF-GWA] Ground Water Abatement (GROUND WATER ABATEMENT)

CONDITIONS

Created By	Condition	Condition Date
shanna.smith	A 30-day extension is granted for the Stage 2 Abatement Plan to be submitted by February 27, 2026.	2/3/2026
shanna.smith	Transition from semi-annual monitoring and sampling to quarterly monitoring and sampling events. Quarterly reports will be submitted at a timely manner after sampling event. Annual reports will not be warranted if quarterly reports are submitted on a timely manner.	2/3/2026
shanna.smith	All applicable site wells will be analyzed for BTEX 8260, sulfates, chlorides and TDS.	2/3/2026
shanna.smith	Continue hand bailing and utilizing oil-only absorbent socks on a monthly basis.	2/3/2026