Collins, Karen, EMNRD

From: Billings, Bradford, EMNRD

Sent: Thursday, February 18, 2021 12:43 PM

To: Mark Larson

Cc: Higginbotham, Christina

Subject: RE: 1RP-4664, Backfill Notification, Targa Midstream Services, LLC, Epperson 16 Inch Pipeline Release,

Lea County, New Mexico

02/18/2021

Chistina Higginbotham – TARGA Mark Larson – LAE

RE; Backfill request on areas associated with 1RP-4664

After review of the supplied data and information, the following: Approval is given by the Oil Conservation Division (OCD) to proceed with backfill operations as requested. OCD thanks you for your efforts. Please make OCD aware of timing for backfill and completion.

Sincerely,

Bradford G. Billings EMNRD/OCD

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: Mark Larson < Mark@laenvironmental.com>

Sent: Tuesday, February 9, 2021 8:51 AM

To: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us> **Subject:** [EXT] Re: 1RP-4664, Backfill Notification, Targa Midstream Services, LLC, Epperson 16 Inch Pipeline Release, Lea County, New Mexico

Hello Mr. Billings and Ms. Eads,

This message is submitted to the New Mexico Oil Conservation Division (OCD) on behalf of Targa Midstream Services, LLC (Targa) to provide notification as required by 19.15.29.12D(1)(a) NMAC for backfilling the excavation at the Epperson 16 inch pipeline (1RP-4664) located in Lea County, New Mexico. Between October 2017 and November 2020, Gandy Marley Inc. (GMI), under supervision from Larson & Associates, Inc. (LAI), excavated approximately 4,432 cubic yards of soil that was disposed at the Gandy Marly Landfill located between Tatum and Roswell, New Mexico. LIA personnel collected confirmation soil samples from the excavation bottom and sidewalls that were analyzed for benzene, toluene, ethylbenzene, xylenes (BTEX), total petroleum hydrocarbons (TPH) and chloride by EPA SW-846 Methods 8021B/8260, 8015 and 300, respectively. The final laboratory results are below the closure standards in Table 1 of 19.15.29.12 NMAC, therefore, Targa will backfill the excavation with clean material meeting the requirements by 19.15.29.13D(1). Please refer to the attached analytical data tables and drawings. The closure report will be submitted upon completion of excavation backfilling. A remediation plan will be submitted separately for the groundwater impact. Please contact Christina Higginbotham with Targa Resources at (713) 584-1396 or email chigginbotham@targaresources.com or me if you have any questions.

Thank you,

Mark J. Larson, P.G.
President/Sr. Hydrogeologist
507 N. Marienfeld St., Suite 202
Midland, Texas 79701
Office – 432-687-0901
Cell – 432- 556-8656
Fax – 432-687-0456
mark@laenvironmental.com



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