

'Strategic Energy Investments'

4526 Research Forest Drive, Suite 200 The Woodlands, Texas 77381 281-875-6200

February 25, 2015

Heather Patterson Environmental Specialist NMOCD District II 811 S. First St. Artesia, NM 88210

SUBJECT: Remediation of Beeson F Federal #29 release from 03 August 2014

Ms. Patterson,

EnergyQuest has completed the dirt work for remediation of the area impacted by the 03 August 2014 release from the Beeson F Federal #29 flow line. Photos of the completed work are attached. This impacted area was a natural depression prior to the release; as such, the site was contoured to re-establish, as closely as possible, the original appearance of the area.

We plan to re-seed the area using BLM-approved seed mixture when appropriate. To that end, we have asked for guidance from BLM regarding the best time to sow the seed.

Should you have any questions, do not hesitate to contact the undersigned.

Very Truly Yours, EnergyQuest II, LLC

Larry D. Davis

Environmental Quality and Safety Manager

Telephone: 281-651-5201

District I 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

Form C-141 Revised August 8, 2011

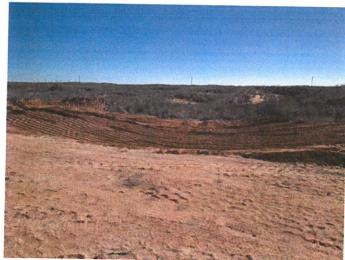
Oil Conservation Division 1220 South St. Francis Dr. Santa Fe. NM 87505

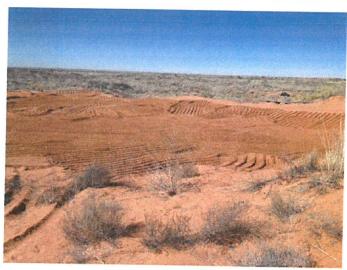
Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

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			Rel	lease Notifi	catio	on and C	orrective A	Actio	n				
Name of Company ENERGYQUEST II, LLC						OPERATOR			☐ Ini	tial Report	Final Rep		
Address 45	Address 4526 RESEARCH FOREST DRIVE SHITE 200						Contact LARRY DAVIS						
THE WOO	THE WOODLANDS, TX 77381						Telephone No. 281-875-6200						
	Facility Name BEESON F FEDERAL #029						Facility Type OIL						
Surface Ow	Surface Owner Bureau of Land Management Mineral Ov						vner APIN 20 015 51111						
	Y 0.5.						API No. 30-015-31164						
Unit Letter	Section	Township	Range	Feet from the	ATIO	TION OF RELEASE							
			Kange	Feet from the	North	/South Line	Feet from the East/West Line		County				
A	31	17S	30E	330	NOR'	TH LINE	330	EAST	LINE	EDDY			
			Latin	tude <u>32.797391</u>	381562	22 Longitud	e -104 0038153			LODI			
								117332					
Type of Relea	Type of Release PRODUCED SALT WATER						Volume of Release Volume Recovered						
Source of Release						40 BBL 0			0				
BREAK IN WATER INJECTION LINE Was Immediate Notice Given?						Date and Hour of Occurrence Date 2 AUG 2014, 1530 HOURS 03			Date and	ate and Hour of Discovery			
was immediate Notice Given? ☐ Yes ☐ No ☐ Not Requi						If YES, To Whom?							
By Whom?						3 234-5972							
GREG MCWILLIAMS (806) 445-1728 Was a Watercourse Reached?						Date and Hour 03 AUG 2014, 1026 HOURS							
was a watercourse Reached? ☐ Yes ☒ No						If YES, Volume Impacting the Watercourse.							
If a Watercourse was Impacted, Describe Fully.*													
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Describe Cause	of Problem	m and Dame !	1 4										
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>		023		T	OIL CONSERVATION DIVISION								
Signature:	ignature: my ll						ESTABLICATION DIVISION						
Printed Name: LARRY DAVIS						Approved by Environmental Specialist:							
							7 20 Monthelital Specialist.						
	itle: MANAGER, ENVIRONMENTAL QUALITY AND SAFETY						pproval Date: Expiration			Date:			
E-mail Address:	-mail Address: larry.davis@energyquest.us						Conditions of Approval:						
Date: 25 FEBRU	ate: 25 FEBRUARY 2015 Phone: 281-651-5201										Attached		









Larry Davis

From:

Patterson, Heather, EMNRD < Heather. Patterson@state.nm.us>

Sent:

Tuesday, December 09, 2014 2:29 PM

To:

Larry Davis

Cc:

Jeff Teare; Greg McWilliams; Cliff Brunson; Hughes, Solomon; Bratcher, Mike, EMNRD

Subject:

RE: Remediation of release site Beeson F Federal #029

Larry,

Your proposed remediation is approved as written.

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.

If you have any questions or concerns, and for notification, please contact me.

Heather Patterson Environmental Specialist NMOCD District II (575)748-1283 ext.101

From: Larry Davis [mailto:Larry.Davis@energyquest.us]

Sent: Monday, December 01, 2014 3:19 PM

To: Patterson, Heather, EMNRD

Cc: Jeff Teare; Greg McWilliams; Cliff Brunson

Subject: Remediation of release site Beeson F Federal #029

Heather,

Regarding remediation of the Beeson F Federal #029 site resulting from a release on 03 August 2014, EnergyQuest has repaired all damaged lines and excavated the impacted area, removing contaminated soils and vegetation. Samples from that site were tested; initial analysis is attached. (See PDF's "Lab Analysis" and Lab Summary" dated 8-20-14). On 23 October 2014, EnergyQuest met and consulted with Sol Hughes and Jeffrey Robertson from the BLM. Following an on-site visit by both gentlemen, a remediation plan was developed and submitted to the BLM for approval. Below is the plan presented:

Corrective Actions for Beeson F Federal #029 Release site

It has been determined that this area has no groundwater concerns. Excavation at the site has reached a depth of approximately thirteen feet. Included in the discussion was reduction of the pad site and using material from the pad both as backfill and potentially as the cap over the backfill.

The corrective actions we discussed included:

- 1. Extract one (1) core sample from the floor of the excavated site and test for chlorides.
- Remove caliche from the outer skirt of the #029 pad and re-use it for backfill and as a cap over the backfill.
 Extract sample from this material to verify it is clean of contaminants before using it for a cap over the backfill.
- 3. Backfill the excavation to the exposed natural caliche layer.

- 4. Cap the backfill with at least 1 foot of clean caliche (intent is to use caliche from the #029 pad if sampling shows it to be clean if not, clean caliche will be brought in).
- 5. Add an additional 2 feet of clean, viable soil to the caliche cap, and contour the entire site to imitate as best as possible the natural contours of the surrounding area.
- 6. Replace material removed from the #029 pad with enough clean, viable soil to allow for proper root growth and contouring of the area to imitate as best as possible the natural contours of the surrounding area.
- 7. When appropriate, re-seed both locations with mixture determined by the BLM as best suited for the area.

BLM accepted EnergyQuest's proposal for Corrective Actions on October 29, 2014, with the stipulation that additional samples demonstrated that contaminants were within acceptable limits. (See attached email "Re: EnergyQuest Proposed Actions – Grayburg Water Flood and Beeson #029".) Please be aware that this email also contains a proposal for remediation of the Grayburg Jackson Water Flood Tank Battery, which is not part of the Beeson #29 incident. That remediation is to correct historical damage that EnergyQuest inherited from previous operators.

As directed by the BLM, additional samples were taken from the Beeson #29 site and submitted for analysis; testing demonstrated that samples were within limits. (See attached email "Sampling Results – Beeson F Federal #29" and PDF's "Lab Analysis" and "Lab Summary" dated 11-14-14).

On December 1, 2014, Sol Hughes gave BLM's approval to proceed with remediation and outlined expectations. However, BLM stipulated that the proposal still requires approval from NMOCD. ("Re: Sampling Results – Beeson F Federal #29".)

In accordance with that requirement, EnergyQuest now submits our proposal and supporting documents for your review and approval.

Larry D. Davis
Environmental Quality & Safety Manager

IEnergy Quest

Telephone: 281-651-5201 (direct)

E-Fax: 281-651-5207