

# Rice Environmental Consulting & Safety

P.O. Box 2948, Hobbs, NM 88241  
Phone 575.393.2967

**February 4<sup>th</sup>, 2014**

**Ms. Jennifer E. Van Curen**

Environmental Protection Specialist  
BLM  
320 E. Greene St.  
Carlsbad, New Mexico 88220

**RE: Updated Corrective Action Plan  
GP II Littlefield BO Federal #2 Battery (2RP-1738)  
UL/A sec. 34 T26S R29E  
API No. 30-015-24529**

Ms. Van Curen:

GP II Energy (GP II) has retained Rice Environmental Consulting and Safety (RECS) to address potential environmental concerns at the above-referenced site.

## **Background and Previous Work**

The site is located approximately 32.6 miles southeast of Carlsbad, New Mexico at UL/A sec. 34 T26S R29E. BLM records indicate that groundwater will likely be encountered at a depth of approximately 58 +/- feet.

On July 15<sup>th</sup>, 2013, GP II received a Letter of Violation from EMNRD for the Littlefield BO Federal #2 Battery (Appendix A). During a routine inspection, hydrocarbon staining was discovered at the well head, which extended out onto the well pad. In addition, the southwest corner of the bermed battery area had standing oil. GP II filed an initial C-141 for the site, which was approved by NMOCD on July 23<sup>rd</sup>, 2013 (Appendix B). The initial C-141 stated that the power switched off on the transfer pump and caused the water storage tank to overflow. A total of approximately 12 – 15 barrels of produced water and oil were released at the site and 8 – 10 barrels of this fluid was recovered.

RECS personnel were on site beginning on September 6<sup>th</sup>, 2013 to assess the site. The stained area on the pad was scraped down to a depth of 1 foot and a 5 point composite of the bottom of the scrape was taken to a commercial laboratory for analysis (Figure 1 and Appendix C). The 5 point composite returned a laboratory chloride reading of 848 mg/kg and Gasoline Range Organics (GRO), Diesel Range Organics (DRO) and BTEX readings of non-detect. Vertical installation was attempted within the bermed battery area but had to be abandoned once an unmarked PVC pipe was discovered. Two samples were taken prior to the vertical being abandoned. The 4 ft sample returned a field chloride result of 12,497 mg/kg and the 5 ft sample returned a field chloride result of 2,100 mg/kg.

A Corrective Action Plan was submitted to NMOCD and BLM on December 4<sup>th</sup>, 2013. As requested by BLM, an Addendum was submitted to NMOCD and BLM on the same

day. The Addendum stated that the southwest corner of the bermed battery still needed to be delineated. Another vertical would be installed in the southwest corner of the battery to a depth where laboratory chloride readings indicated a significant decline. Once this had been achieved, the highest impacted soil, to a depth of 2-3 ft bgs, would be excavated and sent to a NMOCD approved facility. The excavation would be backfilled with clean, imported soil and a 40 mil reinforced poly liner would be installed over the surface of the area. BLM approved the Addendum on December 4<sup>th</sup>, 2013.

On December 26<sup>th</sup>, 2013, the previous vertical was extended to the north and with some effort, RECS was able to break through the rock and get samples at a depth of 5.5 ft and 6 ft (Figure 1). Both these samples were taken to a commercial laboratory and returned chloride values below 1,000 mg/kg (Appendix D). Another vertical was installed to the northeast and determined that rock was located there as well. This data was sent to BLM and NMOCD on January 15<sup>th</sup>, 2014. BLM replied to this data by requesting a site visit with RECS and NMOCD on January 22<sup>nd</sup>, 2014.

### **Update Corrective Action Plan**

Based on the meeting with BLM and NMOCD on January 22<sup>nd</sup>, 2014, BLM and NMOCD requested that following items be addressed by GPII (Figure 2):

1. The pump jack is leaking and needs to be repaired.
2. The area around the pump jack needs to be scraped down to 1 ft bgs and replaced with clean, imported soil.
3. The scrape south of the pump jack needs to be extended south to the edge of the vegetation and erosion controls needs to be installed at the edge of the vegetation.
4. The east side of the pad needs to be reclaimed. The large rocks should be removed and the site seeded with a 3:4 mix.
5. There is a large hole to the northeast of the site. If the hole has been sampled, that data needs to go to BLM and NMOCD to prove the hole is clean. If not, the hole needs to be sampled and the laboratory data sent to BLM and NMOCD. The trash and debris need to be removed from the hole. If the hole is proved clean, the large rocks from the east side of the pad can be used to help backfill the hole. The hole needs to be backfilled then seeded with a 3:4 mix.
6. The old pit north of the site is beginning to be uncovered. Clean soil needs to be placed over the former pit so that the liner is not visible. A ravine needs to be cut into the imported soil to allow water to drain off the pit area and around the battery (not through the battery).
7. The short, tan tank seems to be leaking. BLM requests a tank integrity test and then the tank needs to be repaired or replaced. If it is replaced, the soil under the tank needs to be remediated per BLM/NMOCD guidelines.
8. The stock tank in the battery must be eliminated.
9. The area west and south of the tanks must be reclaimed.

- a. All leaking pipes and the pump must be repaired to eliminate the leaks.  
All unnecessary equipment needs to be removed.
  - b. The area west of the tanks will be excavated to the depth of the rock.
  - c. The excavated area will be padded with 6 inches of clean, imported soil to prevent liner punctures.
  - d. A 40-mil reinforced poly liner will be installed over the padding, under the new berms and south of the tanks.
  - e. The west excavation will be backfilled with caliche to 1 ft bgs, then 1 ft of topsoil over the caliche. The area south of the tanks needs to be backfilled with caliche to the surface.
  - f. The reclaimed areas need to be seeded with a 3:4 seed mix.
10. There is a wooden junction box on the southwest corner of the site that is leaking.  
If the box belongs to GP II, it needs to be fixed and soil around it remediated.

Once these activities have been completed, a Termination Request will be sent to BLM and NMOCD requesting site closure.

RECS appreciates the opportunity to work with you on this project. Please call Hack Conder at (575) 393-2967 or me if you have any questions or wish to discuss the site.

Sincerely,



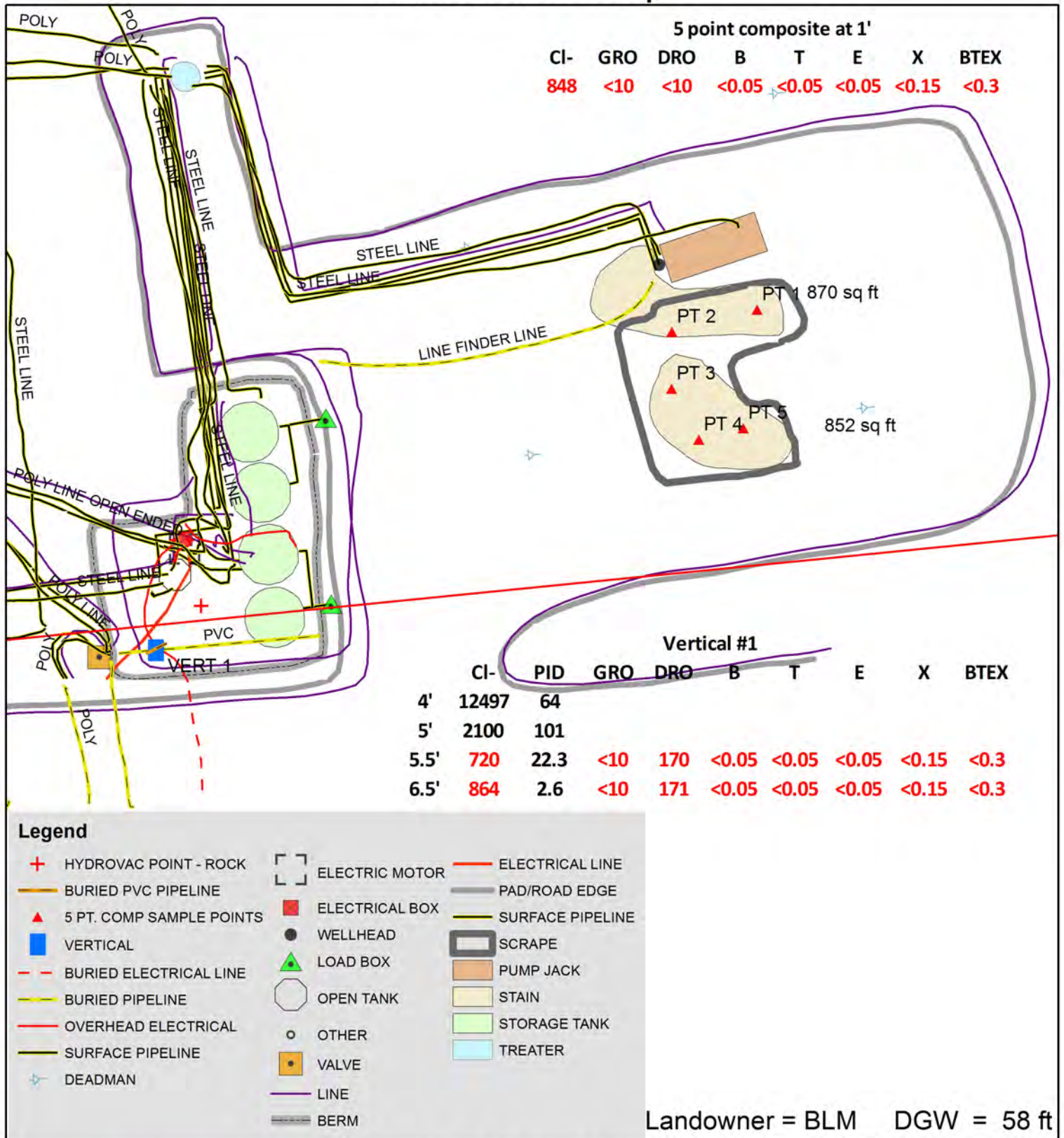
Lara Weinheimer  
Project Scientist  
RECS  
(575) 441-0431

Attachments:

- Figure 1 – Excavation Map
- Figure 2 – Corrective Actions
- Appendix A – Letter of Violation
- Appendix B – Initial C-141
- Appendix C – 5 Point Composite Lab
- Appendix D – Vertical Sampling Lab

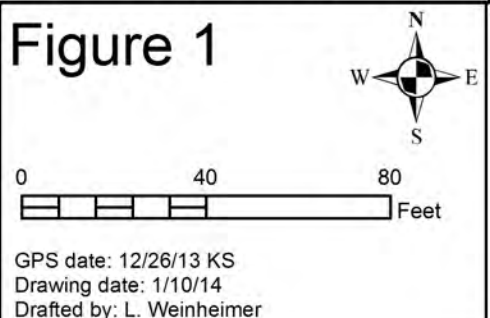
# Figures

# Excavation Map



**GP II ENERGY  
LITTLEFIELD BO  
FEDERAL #2 BATTERY  
(2RP-1738)**  
LEGALS: UL/A Sec. 34  
T26S - R29E  
EDDY COUNTY, NM

**Figure 1**





# Corrective Actions

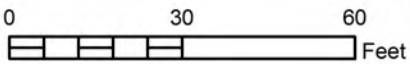
## Legend

- HYDROVAC POINT - ROCK
- PROPOSED BERMS
- BURIED PVC PIPELINE
- 5 PT. COMP SAMPLE POINTS
- VERTICAL
- BURIED ELECTRICAL LINE
- BURIED PIPELINE
- OVERHEAD ELECTRICAL
- SURFACE PIPELINE
- DEADMAN
- ELECTRIC MOTOR
- ELECTRICAL BOX
- WELLHEAD
- LOAD BOX
- OPEN TANK
- OTHER
- JUNCTION BOX
- BERM
- ELECTRICAL LINE
- PAD/ROAD EDGE
- SURFACE PIPELINE
- DOWNSIZE AND RECLAIM
- FORMER PIT
- PROPOSED 40-MIL REINFORCED POLY LINER
- SAMPLE, BACKFILL AND RECLAIM
- SCRAPE TO 1 FT
- SCRAPE
- PUMP JACK
- STAIN
- STORAGE TANK
- TREATER



**GP II ENERGY  
LITTLEFIELD BO  
FEDERAL #2 BATTERY  
(2RP-1738)  
LEGALS: UL/A Sec. 34  
T26S - R29E  
EDDY COUNTY, NM**

**Figure 2**



GPS date: 12/26/13 KS  
Drawing date: 1/22/14  
Drafted by: L. Weinheimer



# Appendix A

## Letter of Violation

**RICE Environmental Consulting and Safety (RECS)**  
P.O. Box 2948 Hobbs, NM 88241  
Phone 575.393.2967

# State of New Mexico

## Energy, Minerals and Natural Resources Department

**Susana Martinez**  
Governor

**David Martin**  
Cabinet Secretary-Designate

**Brett F. Woods, Ph.D.**  
Deputy Cabinet Secretary

**Jami Bailey, Division Director**  
Oil Conservation Division



**\*Response Required - Deadline Enclosed\***

*Field Inspection Program*  
*"Preserving the Integrity of Our Environment"*

15-Jul-13

**GP II ENERGY INC**  
113 CORPORATE DRIVE  
MIDLAND TX 79705

**LETTER OF VIOLATION - Inspection**

Dear Operator:

The following inspection(s) indicate that the well, equipment, location or operational status of the well(s) failed to meet standards of the New Mexico Oil Conservation Division as described in the detail section below. To comply with standards imposed by Rules and Regulations of the Division, corrective action must be taken immediately and the situation brought into compliance. The detail section indicates preliminary findings and/or probable nature of the violation. This determination is based on an inspection of your well or facility by an inspector employed by the Oil Conservation Division on the date(s) indicated.

Please notify the proper district office of the Division, in writing, of the date corrective actions are scheduled to be made so that arrangements can be made to reinspect the well and/or facility.

***INSPECTION DETAIL SECTION***

LITTLEFIELD BO FEDERAL No.002				A-34-26S-29E	30-015-24529-00-00	
Inspection Date	Type Inspection	Inspector	Violation?	*Significant Non-Compliance?	Corrective Action Due By:	Inspection No.
07/11/2013	Routine/Periodic	Mike Bratcher	Yes	No	8/11/2013	iMLB1319244223
Comments on Inspection:		During a routine inspection of this site, the following was observed: Hydrocarbon staining at well head, extending out on to well pad. Areas in the tank battery are heavily impacted with oil and produced water. There are two open top fiberglass storage tanks on the south end of battery. The north (tan) fiberglass tank appears to have been allowed to overflow on what appears to be more than one occasion. Bermed area on west side of these vessels has oil standing in sw corner. Impacted soils are present inside and outside the battery area on west side. OCD is requesting that GPII submit a Form C-141 to report the release/releases that have occurred at this facility. Well is in violation of NMAC 19.15.29. Standing oil and/or produced fluid is to be removed immediately. Highly conatminated soils are to be excavated and hauled to disposal or temporarily stored in a lined, bermed portion of the facility. All areas of contamination are to be delineated and a remediation proposal submitted to NMOCD and BLM for review. Delineation samples are to be tested for (at a minimum) GRO/DRO, BTEX, and chloride content. Additional sampling and testing will be required as project progresses. Standing fluid removal is to commence immediately. Highly contaminated/saturated soil excavation is to commence after notification and approval from NMOCD and BLM. NMOCD contact is Mike Bratcher (575-748-1283 Ext 108) Contact for BLM is Jim Amos (575-234-5909)				



In the event that a satisfactory response is not received to this letter of direction by the "Corrective Action Due By:" date shown above, further enforcement will occur. Such enforcement may include this office applying to the Division for an order summoning you to a hearing before a Division Examiner in Santa Fe to show cause why you should not be ordered to permanently plug and abandon this well.

Sincerely,

Artesia OCD District Office

**Note:** Information in Detail Section comes directly from field inspector data entries - not all blanks will contain data.

\*Significant Non-Compliance events are reported directly to the EPA, Region VI, Dallas, Texas.

# Appendix B

Initial C-141

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

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

Form C-141  
Revised August 8, 2011

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

Release Notification and Corrective Action

NJM 1320428744

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company GP II Energy, Inc. 8359	Contact Chris Richardson
Address 113 Corporate Dr.	Telephone No. 432-967-8950
Facility Name Littlefield Federal BO #2	Facility Type Tank Battery

Surface Owner Federal	Mineral Owner Federal	API No. 30-015-24529
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LOCATION OF RELEASE

Unit Letter B	Section 34	Township 26S	Range 29E	Feet from the 724	North/South Line North	Feet from the 660	East/West Line East	County Eddy
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Latitude 32.0033 Longitude -103.96554

NATURE OF RELEASE

Type of Release Water/Oil	Volume of Release ~12-15 Bbls.	Volume Recovered 8-10 Bbls.
Source of Release Water Tank	Date and Hour of Occurrence 6 July 2013 9:00 am	Date and Hour of Discovery 6 July 2013 9:30 am
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

RECEIVED

JUL 22 2013

Describe Cause of Problem and Remedial Action Taken.\*

NMOCD ARTESIA

Power switched off on transfer pump caused water storage tank to overflow. Vacuumed up spill inside berm.

Describe Area Affected and Cleanup Action Taken.\*

Spill was confined inside battery firewall berm area. Operator has contacted Basin Environmental to evaluate and remediate contamination.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD 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 NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD 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.

Signature:

Joe Compton

Printed Name:

JOE COMPTON

Title:

AGENT

E-mail Address:

compton@gp2energy.com

Date:

7 JULY 2013 Phone: 432-684-4748

\* Attach Additional Sheets If Necessary

EXT. 29

OIL CONSERVATION DIVISION

Approved by Environmental Specialist:

Signed By

Mike Benavides

JUL 23 2013

Approval Date:

Expiration Date:

Conditions of Approval:

Remediation per OCD Rule & Guidelines, & like approval by BLM. SUBMIT REMEDIATION

Attached ☐

PROPOSAL NO LATER THAN:

August 23, 2013

2RP-1738