

NM OIL CONSERVATION

ARTESIA DISTRICT

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

JUL 28 2017

Form C-141
Revised April 3, 2017

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

RECEIVED

Release Notification and Corrective Action

NAB1721457413

277558

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company LIME ROCK RESOURCES II-A, L.P.	Contact Mike Barrett
Address 1111 Bagby Street Suite 4600, Houston, TX 77002	Telephone No. 575-365-9724
Facility Name WEST RED LAKE UNIT #25	Facility Type Injection Well
Surface Owner BLM	Mineral Owner Federal
API No. 30-015-00819	

LOCATION OF RELEASE

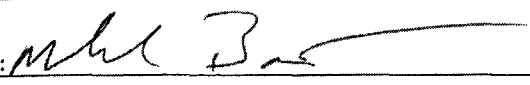
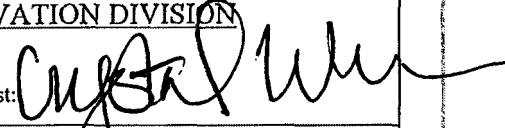
Unit Letter A	Section 8	Township 18S	Range 27E	Feet from the 121	North/South Line North	Feet from the 1003	East/West Line East	County Eddy
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Latitude 32.7691574 Longitude -104.2951431 NAD83

NATURE OF RELEASE

Type of Release Produced Water	Volume of Release 330bbls	Volume Recovered 300bbls
Source of Release Failed Nipple	Date and Hour of Occurrence June 28, 2017 @ 10:00am	Date and Hour of Discovery June 28, 2017 @ 10:30am
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Mike Bratcher-NMOCD Shelly Tucker-BLM	
By Whom? Sheldon Hitchcock-Talon/LPE	Date and Hour June 28, 2017 5:22pm	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. N/A	
If a Watercourse was Impacted, Describe Fully.* N/A		
Describe Cause of Problem and Remedial Action Taken.* A nipple on the filter pot failed due to corrosion resulting in the loss of approximately 330bbls of produced water. The nipple was replaced and the well was put back into service.		
Describe Area Affected and Cleanup Action Taken.* All of the fluid remained within the berms of the location. Vacuum trucks were utilized to recover approximately 300bbls of standing fluid. A remediation work plan will be developed and submitted to NMOCD and BLM for review.		
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.		

OIL CONSERVATION DIVISION

Signature: 	Approved by Environmental Specialist: 	
Printed Name: Mike Barrett	Approval Date: 8/2/17	Expiration Date: N/A
Title: Production Superintendent	Conditions of Approval: see attached	
E-mail Address: mbarrett@limerockresources.com	Attached <input checked="" type="checkbox"/>	
Date: 7/26/2017	Phone: 575-365-9724	

* Attach Additional Sheets If Necessary

2RP-4315

713117AB

Operator/Responsible Party,

The OCD has received the form C-141 you provided on **7/28/17** regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 2RP-4315 has been assigned. **Please refer to this case number in all future correspondence.**

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

The responsible person shall complete division-approved corrective action for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC. [emphasis added]

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. **As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District II office in Artesia on or before 8/28/17. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.**

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

- Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.
- Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.
- Nominal detection limits for field and laboratory analyses must be provided.
- Composite sampling is not generally allowed.
- Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

- Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.

- If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.

- Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.

Jim Griswold

OCD Environmental Bureau Chief
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
505-476-3465
jim.griswold@state.nm.us

Weaver, Crystal, EMNRD

From: Weaver, Crystal, EMNRD
Sent: Monday, July 31, 2017 2:41 PM
To: 'Sheldon Hitchcock'
Cc: Bratcher, Mike, EMNRD; stucker (stucker@blm.gov); Michael Barrett (mbarrett@limerockresources.com); David Adkins
Subject: RE: Lime Rock: West Red Lake Unit #25 Initial C-141

Hello all,

I have included an excerpt from the OCD Rules for your reference.

"19.15.29.7 DEFINITIONS:

A. "Major release" means:

- (1) an unauthorized release of a volume, excluding gases, in excess of 25 barrels;**
- (2) an unauthorized release of a volume that: (a) results in a fire; (b) will reach a watercourse; (c) may with reasonable probability endanger public health; or (d) results in substantial damage to property or the environment;**
- (3) an unauthorized release of gases in excess of 500 MCF; or**
- (4) a release of a volume that may with reasonable probability be detrimental to water or exceed the standards in Subsections A and B or C of 19.15.30.9 NMAC.**

B. "Minor release" means an unauthorized release of a volume, greater than five barrels but not more than 25 barrels; or greater than 50 MCF but less than 500 MCF of gases. [19.15.29.7 NMAC - Rp, 19.15.3.116 NMAC, 12/1/08]

9.15.29.9 REPORTING REQUIREMENTS:

The person operating or controlling either the release or the location of the release shall provide notification of releases in 19.15.29.8 NMAC as follows.

A. The person shall report a major release by giving both immediate verbal notice and timely written notice pursuant to Subsections A and B of 19.15.29.10 NMAC.

B. The person shall report a minor release by giving timely written notice pursuant to Subsection B of 19.15.29.10 NMAC. [19.15.29.9 NMAC - Rp, 19.15.3.116 NMAC, 12/1/08]

19.15.29.10 CONTENTS OF NOTIFICATION:

A. The person operating or controlling either the release or the location of the release shall provide immediate verbal notification 19.15.29 NMAC <http://164.64.110.239/nmac/parts/title19/19.015.0029.htm> [10/6/2016 1:27:20 PM] within 24 hours of discovery to the division district office for the area within which the release takes place. In addition, the person shall provide immediate verbal notification of a release of a volume that may with reasonable probability be detrimental to water or exceed the standards in Subsections A and B or C of 19.15.30.9 NMAC to the division's environmental bureau chief. The notification shall provide the information required on form C-141.

B. The person operating or controlling either the release or the location of the release shall provide timely written notification within 15 days to the division district office for the area within which the release occurs by completing and filing form C-141. In addition, the person shall provide timely written notification of a release of a volume that may with reasonable probability be detrimental to water or exceed the standards in Subsections A and B or C of 19.15.30.9 NMAC to the division's environmental bureau chief within 15 days after the release is discovered. The written notification shall verify the prior verbal notification and provide appropriate additions or corrections to the information contained in the prior verbal notification. [19.15.29.10 NMAC - Rp, 19.15.3.116 NMAC, 12/1/08]"

This C-141 will be documented as being past due per the rules referenced above.

Crystal Weaver

Environmental Specialist
OCD – Artesia District II
811 S. 1st Street
Artesia, NM 88210
Office: 575-748-1283 ext. 101
Cell: 575-840-5963
Fax: 575-748-9720

From: Sheldon Hitchcock [mailto:slhitchcock@talonlpe.com]
Sent: Monday, July 31, 2017 2:12 PM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; stucker (stucker@blm.gov) <stucker@blm.gov>; Michael Barrett (mbarrett@limerockresources.com) <mbarrett@limerockresources.com>; David Adkins <dadkins@talonlpe.com>
Subject: Re: Lime Rock: West Red Lake Unit #25 Initial C-141

Crystal,

The dates are correct. Please take into consideration that immediate notification was submitted via email on June 28.

Sent from my iPhone

On Jul 31, 2017, at 2:02 PM, Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us> wrote:

Hello all,

I am noticing what I hope is a clerical error. So the C-141 form that you all submitted shows release date of June 28, 2017 and this form was submitted via the email below on 7/27/17. I am not sure what the typo is but please if there is one correct it and resubmit this initial C-141. If there is not a typo then this C-141 form is past due and will be noted as such.

Thank you,

Crystal Weaver

Environmental Specialist
OCD – Artesia District II
811 S. 1st Street
Artesia, NM 88210
Office: 575-748-1283 ext. 101
Cell: 575-840-5963

Fax: 575-748-9720

From: Sheldon Hitchcock [<mailto:slhitchcock@talonlpe.com>]

Sent: Thursday, July 27, 2017 1:46 PM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; 'stucker (stucker@blm.gov)' <stucker@blm.gov>

Cc: 'Michael Barrett (mbarrett@limerockresources.com)' <mbarrett@limerockresources.com>; David Adkins <dadkins@talonlpe.com>

Subject: Lime Rock: West Red Lake Unit #25 Initial C-141

All,

The initial C-141 for the West Red Lake #25 release is attached. Please let me know if you have any questions or concerns.

Respectfully,

Sheldon Hitchcock

Project Manager

Office: 575.746.8768

Direct: 575.616.4021

Cell: 575.689.5198

Fax: 575.746.8905

Emergency: 866.742.0742

Web: www.talonlpe.com

<image001.png>