

From: Tucker, Shelly
To: dan.jones@premieroilgas.com
Cc: [Bratcher, Mike, EMNRD](#); [Weaver, Crystal, EMNRD](#)
Subject: Re: Release - Premier O & G * Parke A Tract 1 #16 * 2RP-7264
Date: Tuesday, July 11, 2017 9:43:06 AM

Mr. Jones,

My name is Shelly Tucker with the BLM, Please be aware per NTL3A, you have to report all releases that occur on Federal lands (gas, oil, water, hazard chems, etc.) directly to the BLM. Please ensure in the future you contact me if you have a release. Please note if the release is greater than 100 bbls of fluid or leaves the location (any volume), requires an immediate notification. Less than 100bbls and does not leave location requires written notification within 15 days. My contact information is listed below.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Shelly J Tucker

Environmental Protection Specialist
O&G Spill/Release Coordinator

Bureau of Land Management
620 E. Greene St
Carlsbad, NM 88220

575.234.5905 - Direct
575.361.0084 - Cellular
575.234.6235 - Emergency Spill Number

stucker@blm.gov

The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. In such an event that the location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until the contaminant issues are fully mitigated and the location is successfully reclaimed. In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

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On Mon, Jul 10, 2017 at 2:14 PM, Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us> wrote:

Hello Daniel,

Yes we have it in the "mail received" inbox up front. Thank you. We usually get most C-141 forms via email so that is why I didn't notice it was received until now. I have it in my hand and I am looking at it and it says that your release occurred on 3/16/17, I am confused. Our inspector was out on site on 6/16/17 where he saw your crew working on immediate response efforts, perhaps the date of 3/16/17 is a typo? If so could you please correct it and resend the C-141 via email if possible. If not then mail submission is fine as well.

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: Daniel Jones [mailto:dan.jones@premieroilgas.com]
Sent: Monday, July 10, 2017 9:18 AM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Subject: RE: Release - Premier O & G

Crystal,

I've been out of town since June 30th. I mailed the C-141 on June 21st. Have you received it?

Daniel

From: Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]
Sent: Friday, June 30, 2017 4:33 PM
To: dan.jones@premieroilgas.com
Cc: Bratcher, Mike, EMNRD; Cordero, Gilbert, EMNRD; Podany, Raymond, EMNRD
Subject: RE: Release - Premier O & G

Daniel,

Just wanted to follow up with you regarding this release and my request for a C-141 on the matter. Your last day to turn in the C-141 would be **tomorrow 7/1/17**. Please get that to us by no later than that date. Submission via email attachment of the form C-141 to both myself and Mike Bratcher would be much appreciated.

Thank you,

Crystal Weaver

Environmental Specialist

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811 S. 1st Street

Artesia, NM 88210

Office: 575-748-1283 ext. 101

Cell: 575-840-5963

Fax: 575-748-9720

From: Daniel Jones [<mailto:dan.jones@premieroilgas.com>]
Sent: Tuesday, June 20, 2017 6:40 AM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Cordero, Gilbert, EMNRD <Gilbert.Cordero@state.nm.us>; Podany, Raymond, EMNRD <Raymond.Podany@state.nm.us>
Subject: RE: Release - Premier O & G

That answers it. Thanks for the explanation.

From: Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]
Sent: Monday, June 19, 2017 4:07 PM
To: dan.jones@premieroilgas.com
Cc: Bratcher, Mike, EMNRD; Cordero, Gilbert, EMNRD; Podany, Raymond, EMNRD
Subject: RE: Release - Premier O & G

Hello Mr. Jones,

I don't recall calling it specifically an oil spill.

Let me try to reiterate what I did say: OCD requires that any oil production fluids that make contact with ground/surface/vegetation/atmosphere (dry gas release) etc. be reported and cleaned/remediated to OCD standards. Because fluids are sometimes a mix of different things it does state in the COAs (that I attached for you in the last email) that samples from releases will be tested by a NELAP certified lab for at minimum the following constituents "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."

Therefore the next step in the process would be to submit the C-141 form and following that a delineation/work plan proposal. I will suggest this, unless you have someone onboard that is experienced in proper methodologies for obtaining samples, providing sites diagrams, data

analysis and tables, etc. I would strongly suggest retaining a third party environmental company.

I hope I have answered your question.

If you have any further questions or concerns please contact myself or Mike Bratcher here at the OCD District II Office.

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: Daniel Jones [<mailto:dan.jones@premieroilgas.com>]

Sent: Monday, June 19, 2017 10:27 AM

To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Cordero, Gilbert, EMNRD <Gilbert.Cordero@state.nm.us>; Podany, Raymond, EMNRD <Raymond.Podany@state.nm.us>
Subject: RE: Release - Premier O & G

Crystal,

I'm confused. The A16 is a disposal well. The fluid ought to be Yeso water. This is reported as an oil spill?

Daniel

From: Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]
Sent: Friday, June 16, 2017 3:40 PM
To: dan.jones@premieroilgas.com
Cc: Bratcher, Mike, EMNRD; Cordero, Gilbert, EMNRD; Podany, Raymond, EMNRD
Subject: FW: Release - Premier O & G

Premier Oil and Gas, Inc. * Dale H Parke "A" Tract 1 #16 * 30-015-30457

Hello Daniel,

Today an OCD representative was on site at the Premier Oil and Gas, Inc. Dale H Parke "A" Tract 1 #16 where an oil production fluid release had occurred. OCD was told by the crew members that were on site that they were going to remove the fluid and contaminated soil/gravel out of the area and then replace it with other gravel.

Although immediate response to a release is authorized and encouraged by OCD, the proper procedures and steps need to then be followed so that you are in compliance with OCD remediation standards. Please provide a C-141 form documenting this spill. This site appears to be on federal land therefore the BLM will need to be notified of the spill as well. To provide some insight to the compliance standards OCD expects I have attached a blank copy of our Conditions of Approval Form (COA) as you requested. You will receive another copy of the COAs again, with info and due dates on it that will relate to this specific release, following after your submission of the required C-141 form.

Here is the link to our website and the page on our site where a list of downloadable OCD forms is provided. Please download and utilize the PDF version of the C-141 form it is easier for both parties to work with.

<http://www.emnrd.state.nm.us/OCD/forms.html>

If you have any questions or concerns please contact myself or Mike Bratcher here at the OCD District II Office.

Please note: When you do send in any correspondence regarding this release we prefer that it be sent in via email to both myself and Mr. Bratcher (mike.bratcher@state.nm.us).

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: Cordero, Gilbert, EMNRD

Sent: Friday, June 16, 2017 10:48 AM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: Podany, Raymond, EMNRD <Raymond.Podany@state.nm.us>

Subject: Release - Premier O & G

Attached are pictures of the Premier O & G, Dale H. Parke "A" TR 1 #16. This well is the first well east of Loco Hills on the south side of the road. I was told that they were going to get the fluid out of the containment area and refill with gravel. There is no liner. The release had just happened this morning

Thanks,

Gilbert Cordero

Staff Manager

NMOCD District II

Office 575.748.1283 ext.114

Cell 575.626.0830