

District I
1625 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 CONS. DIV DIST. 3

Form C-141
Revised August 8, 2011

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

APR 20 2015

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

Release Notification and Corrective Action

OPERATOR

☐ Initial Report

☒ Final Report

Name of Company: HPOC, LLC	Contact: Butch Butler	
Address: PO Box 5046, Buena Vista, CO 81211	Telephone No.: Office-719-395-8059; Butch's cell-719-207-0164	
Facility Name: Eagle Springs Injection Facility	Facility Type: Injection building	
Surface Owner: BLM	Mineral Owner: BLM	API No: 30-043-20950 (Closest well)

LOCATION OF RELEASE

Unit Letter B	Section 8	Township 19N	Range 4W	Feet from the 330	North/South Line NORTH	Feet from the 2275	East/West Line EAST	County SANDOVAL
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Latitude: 35.898269 NORTH; Longitude: 107.281021 WEST

NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: 21 bbls	Volume Recovered: 0 bbls
Source of Release: Charge pump in injection building	Date and Hour of Occurrence: 1/5/15 at approximately 3:00 PM	Date and Hour of Discovery: 1/5/15 at 4:00 PM
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?: Lucas Vargo with the BLM was called at noon on 1/6/15. Lucas said to contact Shari Ketcham with the BLM. Left message for Shari, EM sent.	
By Whom?: Butch Butler	Date and Hour: 1/6/15 at Noon. Email to Shari Ketcham at 12:20 PM.	
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.*		

Describe Cause of Problem and Remedial Action Taken.* The spill was caused by a charge pump failure as described in HPOC's C-141 Initial Report. New maintenance procedures were implemented to prevent future charge pump issues.

Describe Area Affected and Cleanup Action Taken.* When the charge pump failed, water leaked out of HPOC's injection building and water ran onto the ground to the south and southwest of the building. See HPOC's C-141 Initial Report for details. As instructed by the BLM and NM OCD, HPOC collected soil samples from the spill area. Due to snowfall in the area this winter, it took over two months for the ground to dry out. The samples were collected on March 25th. Two, 5-point composite samples were collected in the spill area, one from 3 inch depth and one from 6 inch depth. These samples were sent to Hall Environmental and tested for TPH, BTEX/Benzene and Chlorides. A background soil sample was also collected at 3 inch depth approximately 20-30 feet from the spill area and tested for chlorides. The results of these analyses are included with this C-141. In both spill samples, hydrocarbons were "not detected." Chloride levels were low at 13 & 17 mg/Kg respectively for the spill samples and were "not detected" in the background sample. These levels are below thresholds requiring soil excavation or further remediation. The results were forwarded to the BLM & NM OCD and discussed with them. See email from Shari Ketcham with the BLM that follows, stating that HPOC is "complete with remediation for the Eagle Spring produced water spill."

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: <i>Butch Butler</i>	OIL CONSERVATION DIVISION	
Printed Name: Butch Butler	Approved by Environmental Specialist: <i>[Signature]</i>	
Title: Manager	Approval Date: 6/23/15	Expiration Date:
E-mail Address: bbutler@highplainsop.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: April 15, 2015 Phone: 719-395-8059		

* Attach Additional Sheets If Necessary

#NCS 1507241048



Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

April 01, 2015

Butch Butler
HPOC, LLC
P.O. Box 5046
Buena Vista, CO 81211
TEL: (719) 207-0164
FAX

RE: Eagle Springs 1/5/15 Produced Water

OrderNo.: 1503B98

Dear Butch Butler:

Hall Environmental Analysis Laboratory received 3 sample(s) on 3/26/2015 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Analytical Report

Lab Order 1503B98

Date Reported: 4/1/2015

Hall Environmental Analysis Laboratory, Inc.**CLIENT:** HPOC, LLC**Client Sample ID:** #1-3" depth in spill area**Project:** Eagle Springs 1/5/15 Produced Water**Collection Date:** 3/25/2015 9:00:00 AM**Lab ID:** 1503B98-001**Matrix:** SOIL**Received Date:** 3/26/2015 7:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 8015D: DIESEL RANGE ORGANICS							Analyst: JME
Diesel Range Organics (DRO)	ND	9.9		mg/Kg	1	3/27/2015 9:50:25 PM	18351
Surr: DNOP	108	63.5-128		%REC	1	3/27/2015 9:50:25 PM	18351
EPA METHOD 8015D: GASOLINE RANGE							Analyst: NSB
Gasoline Range Organics (GRO)	ND	4.8		mg/Kg	1	3/28/2015 2:02:04 PM	18355
Surr: BFB	103	80-120		%REC	1	3/28/2015 2:02:04 PM	18355
EPA METHOD 8021B: VOLATILES							Analyst: NSB
Benzene	ND	0.048		mg/Kg	1	3/28/2015 2:02:04 PM	18355
Toluene	ND	0.048		mg/Kg	1	3/28/2015 2:02:04 PM	18355
Ethylbenzene	ND	0.048		mg/Kg	1	3/28/2015 2:02:04 PM	18355
Xylenes, Total	ND	0.096		mg/Kg	1	3/28/2015 2:02:04 PM	18355
Surr: 4-Bromofluorobenzene	106	80-120		%REC	1	3/28/2015 2:02:04 PM	18355
EPA METHOD 300.0: ANIONS							Analyst: SRM
Chloride	13	1.5		mg/Kg	1	3/31/2015 2:00:11 PM	18435

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
	J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
	O	RSD is greater than RSDlimit	P	Sample pH Not In Range
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	Spike Recovery outside accepted recovery limits		

Analytical Report

Lab Order 1503B98

Date Reported: 4/1/2015

Hall Environmental Analysis Laboratory, Inc.**CLIENT:** HPOC, LLC**Client Sample ID:** #2-6" depth in spill area**Project:** Eagle Springs 1/5/15 Produced Water**Collection Date:** 3/25/2015 9:00:00 AM**Lab ID:** 1503B98-002**Matrix:** SOIL**Received Date:** 3/26/2015 7:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 8015D: DIESEL RANGE ORGANICS							Analyst: JME
Diesel Range Organics (DRO)	ND	10		mg/Kg	1	3/27/2015 10:17:34 PM	18351
Surr: DNOP	107	63.5-128		%REC	1	3/27/2015 10:17:34 PM	18351
EPA METHOD 8015D: GASOLINE RANGE							Analyst: NSB
Gasoline Range Organics (GRO)	ND	4.8		mg/Kg	1	3/28/2015 2:30:47 PM	18355
Surr: BFB	96.2	80-120		%REC	1	3/28/2015 2:30:47 PM	18355
EPA METHOD 8021B: VOLATILES							Analyst: NSB
Benzene	ND	0.048		mg/Kg	1	3/28/2015 2:30:47 PM	18355
Toluene	ND	0.048		mg/Kg	1	3/28/2015 2:30:47 PM	18355
Ethylbenzene	ND	0.048		mg/Kg	1	3/28/2015 2:30:47 PM	18355
Xylenes, Total	ND	0.095		mg/Kg	1	3/28/2015 2:30:47 PM	18355
Surr: 4-Bromofluorobenzene	103	80-120		%REC	1	3/28/2015 2:30:47 PM	18355
EPA METHOD 300.0: ANIONS							Analyst: SRM
Chloride	17	1.5		mg/Kg	1	3/31/2015 2:25:00 PM	18435

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH Not In Range
- RL Reporting Detection Limit

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Analytical Report

Lab Order 1503B98

Date Reported: 4/1/2015

Hall Environmental Analysis Laboratory, Inc.**CLIENT:** HPOC, LLC**Client Sample ID:** #3-3" depth-background**Project:** Eagle Springs 1/5/15 Produced Water**Collection Date:** 3/25/2015 9:00:00 AM**Lab ID:** 1503B98-003**Matrix:** SOIL**Received Date:** 3/26/2015 7:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS							Analyst: SRM
Chloride	ND	1.5		mg/Kg	1	3/31/2015 2:49:49 PM	18435

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH Not In Range
- RL Reporting Detection Limit

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QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1503B98

01-Apr-15

Client: HPOC, LLC

Project: Eagle Springs 1/5/15 Produced Water

Sample ID	MB-18435	SampType:	MBLK	TestCode:	EPA Method 300.0: Anions						
Client ID:	PBS	Batch ID:	18435	RunNo:	25209						
Prep Date:	3/31/2015	Analysis Date:	3/31/2015	SeqNo:	745174	Units:	mg/Kg				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Chloride	ND	1.5									

Sample ID	LCS-18435	SampType:	LCS	TestCode:	EPA Method 300.0: Anions						
Client ID:	LCSS	Batch ID:	18435	RunNo:	25209						
Prep Date:	3/31/2015	Analysis Date:	3/31/2015	SeqNo:	745175	Units:	mg/Kg				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Chloride	14	1.5	15.00	0	95.1	90	110				

Qualifiers:

* Value exceeds Maximum Contaminant Level.
E Value above quantitation range
J Analyte detected below quantitation limits
O RSD is greater than RSDlimit
R RPD outside accepted recovery limits
S Spike Recovery outside accepted recovery limits

B Analyte detected in the associated Method Blank
H Holding times for preparation or analysis exceeded
ND Not Detected at the Reporting Limit
P Sample pH Not In Range
RL Reporting Detection Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1503B98

01-Apr-15

Client: HPOC, LLC

Project: Eagle Springs 1/5/15 Produced Water

Sample ID	MB-18351	SampType:	MBLK	TestCode:	EPA Method 8015D: Diesel Range Organics					
Client ID:	PBS	Batch ID:	18351	RunNo:	25073					
Prep Date:	3/26/2015	Analysis Date:	3/27/2015	SeqNo:	742950	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Surr: DNOP	9.7		10.00		97.5	63.5	128			

Sample ID	LCS-18351	SampType:	LCS	TestCode:	EPA Method 8015D: Diesel Range Organics					
Client ID:	LCSS	Batch ID:	18351	RunNo:	25073					
Prep Date:	3/26/2015	Analysis Date:	3/27/2015	SeqNo:	742951	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	48	10	50.00	0	95.2	67.8	130			
Surr: DNOP	4.9		5.000		97.7	63.5	128			

Qualifiers:

* Value exceeds Maximum Contaminant Level.
E Value above quantitation range
J Analyte detected below quantitation limits
O RSD is greater than RSDlimit
R RPD outside accepted recovery limits
S Spike Recovery outside accepted recovery limits

B Analyte detected in the associated Method Blank
H Holding times for preparation or analysis exceeded
ND Not Detected at the Reporting Limit
P Sample pH Not In Range
RL Reporting Detection Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1503B98

01-Apr-15

Client: HPOC, LLC

Project: Eagle Springs 1/5/15 Produced Water

Sample ID	MB-18355	SampType:	MBLK	TestCode:	EPA Method 8015D: Gasoline Range						
Client ID:	PBS	Batch ID:	18355	RunNo:	25124						
Prep Date:	3/26/2015	Analysis Date:	3/27/2015	SeqNo:	742102	Units:	mg/Kg				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Gasoline Range Organics (GRO)	ND	5.0									
Surr: BFB	910		1000		91.2	80	120				

Sample ID	LCS-18355	SampType:	LCS	TestCode:	EPA Method 8015D: Gasoline Range						
Client ID:	LCSS	Batch ID:	18355	RunNo:	25124						
Prep Date:	3/26/2015	Analysis Date:	3/27/2015	SeqNo:	742103	Units:	mg/Kg				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Gasoline Range Organics (GRO)	24	5.0	25.00	0	97.5	64	130				
Surr: BFB	990		1000		99.2	80	120				

Qualifiers:

* Value exceeds Maximum Contaminant Level.
E Value above quantitation range
J Analyte detected below quantitation limits
O RSD is greater than RSDlimit
R RPD outside accepted recovery limits
S Spike Recovery outside accepted recovery limits

B Analyte detected in the associated Method Blank
H Holding times for preparation or analysis exceeded
ND Not Detected at the Reporting Limit
P Sample pH Not In Range
RL Reporting Detection Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1503B98

01-Apr-15

Client: HPOC, LLC

Project: Eagle Springs 1/5/15 Produced Water

Sample ID	MB-18355	SampType:	MBLK	TestCode:	EPA Method 8021B: Volatiles					
Client ID:	PBS	Batch ID:	18355	RunNo:	25124					
Prep Date:	3/26/2015	Analysis Date:	3/27/2015	SeqNo:	742123	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.050								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	1.0		1.000		103	80	120			

Sample ID	LCS-18355	SampType:	LCS	TestCode:	EPA Method 8021B: Volatiles					
Client ID:	LCSS	Batch ID:	18355	RunNo:	25124					
Prep Date:	3/26/2015	Analysis Date:	3/27/2015	SeqNo:	742124	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	1.1	0.050	1.000	0	110	76.6	128			
Toluene	1.1	0.050	1.000	0	106	75	124			
Ethylbenzene	1.0	0.050	1.000	0	104	79.5	126			
Xylenes, Total	3.1	0.10	3.000	0	103	78.8	124			
Surr: 4-Bromofluorobenzene	1.1		1.000		109	80	120			

Qualifiers:

- | | |
|---|--|
| * Value exceeds Maximum Contaminant Level. | B Analyte detected in the associated Method Blank |
| E Value above quantitation range | H Holding times for preparation or analysis exceeded |
| J Analyte detected below quantitation limits | ND Not Detected at the Reporting Limit |
| O RSD is greater than RSDlimit | P Sample pH Not In Range |
| R RPD outside accepted recovery limits | RL Reporting Detection Limit |
| S Spike Recovery outside accepted recovery limits | |



Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

Sample Log-In Check List

Client Name: HPOC LLC

Work Order Number: 1503B98

RcptNo: 1

Received by/date:

LM

03/26/15

Logged By: Celina Sessa

3/26/2015 7:00:00 AM

Celina Sessa

Completed By: Celina Sessa

3/26/2015 8:43:26 AM

Celina Sessa

Reviewed By:

JA

03/26/15

Chain of Custody

1. Custody seals intact on sample bottles? Yes ☐ No ☐ Not Present ☒
2. Is Chain of Custody complete? Yes ☒ No ☐ Not Present ☐
3. How was the sample delivered? Courier

Log In

4. Was an attempt made to cool the samples? Yes ☒ No ☐ NA ☐
5. Were all samples received at a temperature of $>0^{\circ}\text{C}$ to 6.0°C ? Yes ☒ No ☐ NA ☐
6. Sample(s) in proper container(s)? Yes ☒ No ☐
7. Sufficient sample volume for indicated test(s)? Yes ☒ No ☐
8. Are samples (except VOA and ONG) properly preserved? Yes ☒ No ☐
9. Was preservative added to bottles? Yes ☐ No ☒ NA ☐
10. VOA vials have zero headspace? Yes ☐ No ☐ No VOA Vials ☒
11. Were any sample containers received broken? Yes ☐ No ☒
12. Does paperwork match bottle labels?
(Note discrepancies on chain of custody) Yes ☒ No ☐
13. Are matrices correctly identified on Chain of Custody? Yes ☒ No ☐
14. Is it clear what analyses were requested? Yes ☒ No ☐
15. Were all holding times able to be met?
(If no, notify customer for authorization.) Yes ☒ No ☐
- # of preserved bottles checked for pH: _____
(~ 2 or >12 unless noted)
- Adjusted? _____
- Checked by: _____

Special Handling (if applicable)

16. Was client notified of all discrepancies with this order? Yes ☐ No ☐ NA ☒

Person Notified: _____

Date: _____

By Whom: _____

Via: ☐ eMail ☐ Phone ☐ Fax ☐ In Person

Regarding: _____

Client Instructions: _____

17. Additional remarks:

18. Cooler Information

Cooler No	Temp $^{\circ}\text{C}$	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	15	Good	Yes			

Client: HPOC, LLC

Mailing Address: PO Box 5046

Buena Vista, CO 81211

Phone #: 719-207-0164

email or Fax#: bbutler@highplainsop.com

QA/QC Package:

☒ Standard ☐ Level 4 (Full Validation)

☒ Standard ☐ Level 4 (Full Validation)☐ EDD (Type) _____

Sample Temperature: 1.5

Tel. 505-345-3975 Fax 505-345-4107

	X	BTEX + MTBE TMBE (8021)
		BTEX + MTBE + TPH (Gas only)
	X	TPH Method 8015B (Gas/Diesel)
		TPH (Method 418.1)
		EDB (Method 504.1)
		8310 (PNA or PAH)
		RCRA 8 Metals
		Anions (F, Cl, NO ₃ , NO ₂ , PO ₄ , SO ₄)
		8081 Pesticides / 8082 PCB's
		8260B (VOA)
		8270 (Semi-VOA)
	X	Chloride

[illegible]

Remarks:

3/25/15 1975

Sample #3 chloride test only

Date	Time
------	------

19326150700

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.

Butch Butler

From: Ketcham, Shari <sketcham@blm.gov>
Sent: Thursday, April 02, 2015 11:33 AM
To: Butch Butler
Cc: Cory Smith; Richard Mrlik
Subject: Re: FW: Eagle Springs - 1503B98 -- HALL ENVIRONMENTAL RESULTS

Since soil sampling results are below regulatory standards and chlorides are very minimal, High Plains is complete with remediation for the Eagle Spring produced water spill.

Thank you!

Shari Ketcham
Natural Resource Specialist, Spills Biologist
BLM Farmington Field Office
6251 College Blvd Suite A
Farmington, NM 87402
Office: (505) 564-7713
Fax: (505) 564-7607

On Thu, Apr 2, 2015 at 11:26 AM, Butch Butler <bbutler@highplainsop.com> wrote:

Shari & Cory: Attached are the sampling results. I think they look quite good. Please review and let me know your thoughts.

Have a wonderful day,

Butch

From: Jackie Ball [mailto:jnb@hallenvironmental.com]
Sent: Wednesday, April 01, 2015 2:44 PM
To: bbutler@highplainsop.com
Subject: Eagle Springs - 1503B98

Jackie Ball

Hall Environmental Analysis Laboratory

4901 Hawkins NE