## 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.

Name of Company: BP America Production Co.       Contact: Steve Moskal       Initial Report       Final Report         Address: 200 Energy Court, Farmington, NM 87401       Telephone No.: 505-330-9179       Facility Type: Salt Water Disposal Well         Facility Name: JACQUEZ COM No. 005       Facility Type: Salt Water Disposal Well       API No. 3004526833         Surface Owner: Fee       Mineral Owner: Fee       API No. 3004526833         Unit Letter       Section       Township       Range       Feet from the 1,095       North/South Line       Feet from the 2 East/West Line       County: San Juan         A       30       31N       09W       1,095       North/South Line       Feet from the 790       East       County: San Juan         Type of Release: produced water, condensate       Volume of Release: 10 bbl       Volume Recovered: 1.5 bbls       Date and Hour of Discovery: July 31, July 29, 2017         Source of Release: BGT overfilled during flash flow G Not Required       If YES, To Whom?       Date and Hour of Discovery: July 31, July 29, 2017       2017; 3:30 PM         Was Immediate Notice Given?       Yes       Not Required       If YES, To Whom?       Cory Smith – NMOCD – Phone call       Bate and Hour of Discovery: July 31, July 29, 2017         By Whom?       Yes       Not Required       Date and Hour; 7/31/17 – 3:50 PM       Date and Hour of Discovery: July 31, Zuly 29, Zuly 7 <th colspan="13">Release Notification and Corrective Action</th>	Release Notification and Corrective Action												
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A       30       31N       09V       1.095       North       790       East         Latitude36.873387°       Longitude107.814973°         NATURE OF RELEASE         Type of Release: produced water, condensate       Volume of Release: Dobbl       Volume Recovered: 1.5 bbls         Source of Release: BGT overfilled during flash flood event       Date and Hour of Occurrence: July 29, 2017       Date and Hour of Discovery: July 31, July 29, 2017         Was Immediate Notice Given?       If YES, To Whom?       Cory Smith – NMOCD – Phone call         By Whon?       Date and Hour 7/31/17 – 3:50 PM         Was a Watercourse Reached?       If YES, Volume Impacting the Watercourse.       J/L CONS. DIV DIST,         If a Watercourse was Impacted, Describe Fully.*       AUG 16 2017         Describe Cause of Problem and Remedial Action. * During an isolated precipitation event, heavy rains created a flash flood event. The flash flood water broke the earthen berm of the tank containment, entering the below grade tank and washing away the contents. The flood was provided up using absorbent pagts, the pond was skimmed using hydrophobic water booms and the accessible material in the containment areas was removed via hydro-vac. The pond was fleeded to nervernt livestock and wildlife access.         Describe Area Affected and Cleann Action Taken.* The impacted area of the flow path is approximately 125,000 square feet; /s mile by 20-30' wide. The final theory on above is true and complete to the best of my knowledge and underostand t	Unit Letter Se	ection	Townshin	Range		-			Fast/W	lest Line	County: S	an Juan	
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Signature:       Massessing         Printed Name:       Steve Moskal         Approved by Environmental Specialist:       Approved by Environmental Specialist:         Title:       Field Environmental Coordinator         E-mail Address:       steven.moskal@bp.com         Conditions of Approval:       Attached Q	regulations all op public health or t should their opera or the environme	he environ ations hav nt. In add	e required to nment. The ve failed to a lition, NMO	acceptance acceptance adequately OCD accep	d/or file certain r e of a C-141 repo investigate and r	release no ort by the remediate	e NMOCD ma	ad perform correct arked as "Final Roon that pose a three	etive action eport" do eat to gro	ons for releases not releases not releases	eases which ieve the oper r, surface wa	may en ator of ter, hur	danger liability man health
Title: Field Environmental Coordinator     Approval Date:     8/17/17     Expiration Date:       E-mail Address: steven.moskal@bp.com     Conditions of Approval:     Attached Q	Signature: Mars Muc						OIL CONSERVATION DIVISION						
E-mail Address: steven.moskal@bp.com Conditions of Approval: Attached	Printed Name: Steve Moskal						Approved by Environmental Specialist:						
Attached Attached	Title: Field Environmental Coordinator						Approval Date: 8/17/17 Expiration Date:						
Date: August 16, 2017 Discuss 505, 226, 0407	E-mail Address:	steven.mo	skal@bp.co	om			Conditions of Approval:				Attached		
	Date: August 16, Attach Addition:	al Sheets	If Necess	Phone: ary	505-326-9497							7	

## Smith, Cory, EMNRD

From: Sent: To: Cc: Subject: Attachments: Smith, Cory, EMNRD Thursday, August 17, 2017 10:23 AM Moskal, Steven Fields, Vanessa, EMNRD; Perrin, Charlie, EMNRD Jacquez Com #5 Conditions of Approval C-141 Conditions.pdf

Steve,

OCD has reviewed the Initial C-141 submitted on August 16, 2017 in regards to the Jacquez Com #5 (API# 30-045-26833) below are the Conditions of approval that will be attached to hard copy.

- BP will submit a delineation/work plan no later than 8/31/17
- BP will maintain the field fence around the stock pond until the start of remediation and the threat of further contamination due to rain events is eliminated.
- IF BP Chooses to delineate the release prior to remediation please follow the attached Directive.

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If you have any additional questions please give me a call.

Thanks,

Cory Smith Environmental Specialist Oil Conservation Division Energy, Minerals, & Natural Resources 1000 Rio Brazos, Aztec, NM 87410 (505)334-6178 ext 115 cory.smith@state.nm.us **Operator/Responsible Party,** 

The OCD has received the form C-141 you provided on 8/16/17 regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number NSI72125710 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 <u>division-approved corrective action</u> 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 III office in Aztec on or before 8/31/17. 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; C<sub>6</sub> thru C<sub>36</sub>), 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; C<sub>6</sub> thru C<sub>36</sub>), 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.

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