

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

OPERATOR

☒ Subsequent Report ☐ Final Report

Name of Company: BP America Production Co.	Contact: Steve Moskal	
Address: 200 Energy Court, Farmington, NM 87401	Telephone No.: 505-330-9179	
Facility Name: JACQUEZ COM No. 005	Facility Type: Salt Water Disposal Well	
Surface Owner: Fee	Mineral Owner: Fee	API No. 3004526833

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County: San Juan
A	30	31N	09W	1,095	North	790	East	

Latitude 36.873387° Longitude -107.814973°

NATURE OF RELEASE

Type of Release: produced water, condensate	Volume of Release: 10 bbl	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, 2017; 3:30 PM
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Cory Smith – NMOCD – Phone call	
By Whom?	Date and Hour: 7/31/17 – 3:50 PM	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

OIL CONS. DIV DIST. 3
AUG 28 2017

If a Watercourse was Impacted, Describe Fully.*
Entered private livestock pond while travelling across pasture land.



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 water carried the tank contents approximately ½ mile, across opened pasture land, into a livestock pond. The freestanding oil along the flood flow path was picked up using absorbent pads, the pond was skimmed using hydrophobic water booms and the accessible material in the containment area was removed via hydro-vac. The pond was fenced to prevent livestock and wildlife access.

The remedial activities are described in the attached remediation plan. The scope of work was negotiated and approved by the private landowner.

Describe Area Affected and Cleanup Action Taken.* The impacted area of the flow path is approximately 125,000 square feet; ½ mile by 20-30' wide. The final extents of the flow path and containment areas will be determined through excavation and removal of the impacted soil. The remedial work negotiated and approved with the private landowner. BP has already initiated the work, starting on 8/24/17.

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: Steve Moskal	Approval Date: <u>8/29/17</u>	Expiration Date: _____
Title: Field Environmental Coordinator	Conditions of Approval: <u>Sample Area</u> Attached <input type="checkbox"/>	
E-mail Address: steven.moskal@bp.com	For TPH (DRO - GRO - MRO/ARO)	
Date: August 28, 2017 Phone: 505-326-9497	BTEx, Benzene - Large Area Sampling No Larger than 100'x100'	

* Attach Additional Sheets If Necessary

#NCS172125 7101

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BP Remediation Plan

To: Cory Smith & Vanessa Fields – NMOCD Dist. III, Aztec, NM
From: Steve Moskal - BP
CC: Roland Mora; Vance Hixon - BP
Date: 8/28/2017
Re: Jacquez Com 005 Remediation Plan

BACKGROUND

During the early morning hours of July 30, 2017, a flash flood occurred at the Jacquez Com 005 well location. The release was discovered early afternoon on July 31, 2017. The flash flood caused the containment berm of the production tanks to fail, allowing produced water and oil to be carried out of the tanks and containment for approximately one ½ mile into a livestock water pond and stopping shortly thereafter.

The oil impacted soil, vegetation and the surface of the pond water. BP initiated cleanup. The containment area was cleaned of the surface impacts using a vac-truck; the freestanding oil along the flow path of the flood water was removed using soaker pads; the surface of the pond was skimmed using hydrophobic water booms. Sampling of the water indicates there was no significant impact as the results are below the NM WQCC drinking water standards. The pond was fenced and will remain fenced until the remediation of the flow path is complete.

The surface of the well location and release are on private land. Mr. Chris Velasquez is the property owner and was contacted upon discovery of the release. On August 2, 2017, Mr. Velasquez conducted a site assessment with BP and provided guidance and request as to how he would prefer the remediation to be completed.

PHASE I – RELEASE FLOW PATH REMEDIATION

Mr. Velasquez has requested that all impacted soils and vegetation be removed from the location and floodwater flow path. The flow path is illustrated on Figure 1. Once the impacts have been removed, the area is to be backfilled with material from borrow location as specified by Mr. Velasquez. The Borrow Areas are illustrated on Figure 2. Both the remediated and borrow areas will then be reclaimed and seeded per the specified seed mix provided by Mr. Velasquez. Figure 3 illustrates the approved route to be used for importing from the borrow area.

To remove the impacts from the flood area, the soil and vegetation will be scrapped and collected to the extents of the impacts, plus an additional 1-2 feet lateral. The vertical extents of the impacts are not known and will vary. Current estimate is the impacts range from 4-6" deep. The impacted soil will be hauled to a landfarm for disposal. The area from the Jacquez Com 005 well pad to the livestock pond will be remediated in full. The area east of the pond will be remediated using foot traffic and hand tools to only remove the sparse and minimal impacts.

Sampling will be required to achieve closure. Samples will be collected by a third party environmental consultant with sample results available in 24 to 48 hours. Areas which are sampled will be left open until results are received. Once satisfactory results are received, the area will then be backfilled. Samples will be submitted for laboratory analysis for BTEX (EPA 8021), total hydrocarbons (EPA 8015) and chlorides (Method 300.1).

Backfill will require topsoil from the designated borrow area will be placed at a minimum of 4" thick. If fill material is required in any area where topsoil is going to be greater than 6", fill material will be used

from the designated fill borrow area. The area will be seeded via drill seeding and mulching at a later date when planting is optimal; October or early November. One section of the pond dam will need repair. Sourcing of the dirt for the dam repair is not yet determined.

PHASE II – CONTAINMENT REMEDIATION

The production tank containment area will require remediation via excavation. Mr. Velasquez has required that all impacted material be removed from the property. Backfill material will be sourced from the designated Fill Borrow Area. The excavation will require sampling for closure. Samples will be collected by a third party environmental consultant. Samples will be submitted for lab analysis with results available in 24 hours. The sampled areas will not be backfilled until satisfactory lab results are obtained.

Remediation will commence once a written agreement with the landowner is agreed and executed. A final report will follow within 60 days of completion of the earth work. Annual vegetation monitoring will be handled between BP and the landowner.

Thank you,
Steve Moskal

Figure 1 - Flood Flow Path



Figure 2 - Designated Borrow Areas



Figure 3 - Plan Overview

Figure 2 - Designated Borrow Areas

Figure 1 - Flood Flow Path

Approved Truck Route



Google Earth