<u>District I</u> 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**

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

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

Form C-141

Revised August 8, 2011

## **Release Notification and Corrective Action**

					1	<u>OPERAT</u>	OR		Initial	Report	⊠ Fii	nal Report	
Name of Co	mpany: C	Chevron US		Contact: Ricky Bates									
Address: 15	5 Smith R	Rd., Midland		Telephone No.: Work: 432-523-1908 Cell: 432-209-2925									
Facility Nan	ne: West	Dollarhide D		Facility Type: Injection well									
Surface Ow	ner: State	surface	Owner: 8-9613	r: (QLS-091040 – State of New API No. 3002512349									
LOCATION OF RELEASE													
Unit Letter							th/South Line   Feet from the   East/West Line   County						
Е	33	24-S		2310	FNL		330	FWL		Lea			
	Latitude: 32.1748 / Longitude: -103.0729												
				NATU	U <b>RE</b> (	OF RELE	ASE						
Type of Relea	ase: Produc	ced Water	Volume of Release: 15.6 bbl. Volume Recovered: 0										
Source of Rel	lease: Injec	ction line		Date and Hour of Occurrence T/6/2017 8:30 AM Date and Hour of Discovery 7/6/2017 8:30 AM									
Was Immedia	ate Notice (	Given? ⊠	equired	If YES, To Whom? d Olivia Yu									
By Whom? R	cicky Bates		Date and Hour 7/6/2017 1:00 PM										
Was a Watero				If YES, Volume Impacting the Watercourse.									
			Yes 🖂	.10									
If a Watercou	ırse was Im	pacted, Descr		REV	IEWED								
N/A													
14/11	livia Yu at	11:5	9 am,	<b>Jul 10</b>	, 2017	<b>'</b> ]							
Describe Cause of Problem and Remedial Action Taken.*													
Leak in 2" fiberglass injection line. One call has been done, we will dig out area to 24 inches' deep, haul contaminated soil to Sundance then sample area.													
Describe Area Affected and Cleanup Action Taken.*													
All water was on well location. contaminated soil will be hauled to Sundance then samples will be taken.													
I hereby certi	fy that the i	information gi	ven above is	true and comp	lete to t	he best of my	knowledge and u	nderstan	d that purs	suant to NM	AOCD rule	es and	
regulations al	l operators	are required to	o report and	or file certain r	elease r	otifications a	nd perform correc	tive acti	ons for rele	eases which	h may end	anger	
							arked as "Final R						
							on that pose a three the operator of						
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							
									$\sim$				
				Approved by Environmental Specialist:									
X													
Ricky Bates									U				
Signature:													
Printed Name	e: Ricky Ba	ates											
Title: HES Field Support						Approval Date: 7/10/2017 Expiration Date:							
E-mail Addre	ess: rbates@	echevron.com	1			Conditions of	Approval:			A 44 = 1	a 🗇 /		
							ched directiv	е		Attached	u 🖳		
						1RP-474	9 nOY1719	91433	40	pOY17′	191436	82	

## Operator/Responsible Party,

The OCD has received the form C-141 you provided on \_7/6/2017\_ regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number \_1RP-4749\_\_ 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 \_1\_ office in \_\_Hobbs\_\_\_\_ on or before \_8/10/2017\_. 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.

## Jim Griswold

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