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

ation Division
St. Francis Dr.

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

Form C-141 Revised April 3, 2017

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

1220 S. St. Flat	icis Di., Sain	a 1.c, 19191 6750.	,	Sa	ınta Fe	e, NM 875	05						
			Rele	ease Notific	ation	and Co	rrective	Action	n				
			OPERA		☑ Initi	al Report		Final Report					
Name of Co		Contact Sandra Adcox											
Address 4		Telephone No. 432-685-2401 Facility Type: Pipeline											
Facility Nai	me ONEC	K- Denton I	Javis -A	rtesia Lateral		Facility Typ	e: Pipeline						
Surface Owner State Mineral Owner								API No.					
			LOCA	TIO	OF REI	LEASE	Ž.						
Unit Letter	etter Section Township Range R37E Feet from the No.			North/	South Line	East/	West Line	County Lea					
			Latitud	le 33.0454	L	ongitude -	103.1726	NAD	83				
NATURE OF RELEASE													
Type of Rele	ase: Hydro	Test Water		NAI	UKE		Release: unkn	own -	Volume	Recovered:	None		
		to be determined											
Source of Release: Hydro Test Line Failure							Date and Hour of Occurrence Date and Hour of Discovery 7/22/17 10:25am 9/22/2017 7/22/17 10:25am						
Was Immedi	ate Notice (If YES, To Whom?											
		7/22/17 left message NMOCD - Olivia Yu											
By Whom? Ike Tavarez – Tetra Tech Was a Watercourse Reached?							Date and Hour: 7/22/17 2:30 pm						
was a water	course Read	If YES, Volume Impacting the Watercourse. NA											
If a Watercon	ırse was Im	pacted, Descr	ibe Fully.	*			//=1//=						
Not Applicable REVIEWED													
••						By (Olivia Yu	at 1:4	44 pm,	Sep 25	, 20	17	
Describe Cau	ise of Probl	em and Reme	dial Action	n Taken.*									
				ed the Hydro Tes along the ONEOR							he line	is being	
repaired to et	Jillilde tile	icsi. The arre	cicu aica	along the ONDO	C Hight-	or way (ROW) measured app	JOAIIIIAN	1y 20 X 43	•			
Describe Are	a Affected	and Cleanup A	Action Tak	cen.*									
Once the line	. In momnimed	the area will	ha imamaat	ted for documenta	tion on	namalina ifa	aadad						
Once the inic	is repaired	, the area will	be hispeci	ieu ioi documenta	mon or s	sampinig, ii ii	ccucu.						
I harahy carti	fu that the	nformation a	wan above	is true and comp	lata to th	a hast of my	knowledge on	underete	and that nur	cuant to NM	OCD r	ulec and	
				nd/or file certain r									
				ce of a C-141 repo									
				investigate and retance of a C-141									
		ws and/or regu											
Signature:	Pat	OIL CONSERVATION DIVISION											
Printed Name	Patrick	Allison		Approved by Environmental Specialist:									
					9/25/2017								
Title: Envir	onmental S	upervisor			Approval Date: Expiration Date:								
E-mail Address: Patrick.Allison@oneok.com						Conditions of Approval:							
D	0017		500 370 0171		see attached directive								

* Attach Additional Sheets If Necessary

Date: 09/22/2017

fOY1726850549

Phone: 580.370.2171

1RP-4822

nOY1726850834

pOY1726851093

Operator/Responsible Party,

The OCD has received the form C-141 you provided on _9/22/2017_ regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number _1RP-4822__ 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 _10/25/2017_. 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; C₆ thru C₃₆), 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; C₆ thru C₃₆), 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