

Summary of Agreed-Upon Actions From 12/6/17 Meeting Between KJE, OWL, SLO, & NMOCD

- KJE/OWL will be requesting full closure for Spill No. 2 (1RP-4498), based on the completion of the activities described in the previously approved Remediation Plan.
- KJE/OWL will request deferral from NMOCD in writing for the area beneath the pipelines for Spill No. 1 (1RP-4497). KJE/OWL will provide a map specifically outlining the area for deferral. Remediation would be required if/once infrastructure (pipelines) impeding remediation is removed. We will need to verify this will be suitable for OWL's insurance company.
- For delineation of 1RP-4820 & 1RP-4860, KJE/OWL will choose a percentage of locations for the first two sample depths to have analyzed on a rush turn from the laboratory for the full suite of constituents of concern to reduce the volume of samples requiring full suite analysis. KJE/OWL will send the proposed locations and sampling plan to Olivia for approval. It will be required for one of the locations to be from the most heavily impacted area.
- OWL will confirm that an approved Right-of-Entry permit has been received for 1RP-4820 prior to beginning delineation work.
- Per NMOCD request, KJE/OWL will maintain notes on file of the determination method for calculation of spill loss for future spills.
- Per NMOCD request, KJE/OWL will check with the pipeline owners for recent and future spills regarding the safe excavation distance from their respective pipelines and whether they are willing to temporarily suspend service for delineation and remediation activities.
- Per NMOCD request, KJE/OWL will notify NMOCD 48 business hours prior to future sampling events.
- Per NMOCD request, for recent and future spills, if blending is the chosen remediation method, a sample will be collected from every 25 cubic yards of blended soil and analyzed for BTEX, TPH extended range, and chloride.
- Per NMOCD request, for recent and future spills, additional samples will be collected five (5) feet below the deepest clean samples for verification of vertical delineation.
- Per NMOCD request, for recent and future spills, samples will be collected from the side walls of the excavations for verification of horizontal delineation.
- Per NMOCD request, for recent and future spills, GPS coordinates will be provided to NMOCD for all sampling locations.
- Per NMOCD request, for recent and future spills, photo documentation will be provided for each stage of the spill delineation/remediation process.
- Per NMOCD direction, recent and future spills will require deferral of impacted pipeline areas.
- Per NMOCD request, for all spills, a comparison of field data and laboratory results will be provided on one table.
- Per NMOCD request, for 1RP-4497 & 1RP-4498, KJE/OWL will suspend the previously approved use of excess blended soil at nearby OWL SWD locations until laboratory data/depth to groundwater can be reviewed and approved.
- Per NMOCD direction, KJE/OWL can further refine the spill area as we delineate and send data to Olivia.
- Per NMOCD direction, KJE/OWL can collect a representative sample of fluid released for laboratory analysis of the constituents of concern (BTEX, TPH extended range, and chloride) in an effort to reduce the volume of constituents requiring analysis during delineation & remediation.
- Per SLO request, KJE/OWL will provide a map of the excavation area, spill area, sampling points, and lab data for delineation and clearance sampling. Amber will review the information with Bradford and submit a response in the next few weeks regarding the acceptability of the existing excavation.
- The delineation work plan for 1RP-4860 is currently in review with NMOCD, and should be approved within the next week.
- Olivia will upload all approvals to the NMOCD online system.
- Per NMOCD request in relation to future releases, KJE/OWL will report to all agencies simultaneously.
- Per NMOCD request in relation to future releases, delineation must be approved prior to commencement of remediation. This does not include emergency response actions to prevent further migration of the release (removal of liquids, covering with poly, berming the affected area).
- Per NMOCD request in relation to future releases, the optimal timeframe from notification/1RP issuance to closure is 90 days.

OWL Meeting Agenda

Location: 1001 South Atkinson Avenue Roswell, NM 88203

Time: 10 am MST; December 6, 2017

Attendees:

Amber Groves (NMSLO)
Mark Naranjo (NMSLO)
Bradford Billings (NMOCD)
Olivia Yu (NMOCD)

Dena Vandenberg (KJ Environmental)
Kevin Ware (KJ Environmental)
Nevin Bannister (OWL)
Phillip Sanders (OWL)

Discussion topics

I) 2016 1RPs

A) 1RP-4497 summary (Spill 1; State surface)

Release date: unknown; discovered 7 am MST 10/28/2016

Volume released: 1659 bbls produced water and crude oil

Volume recovered: 1200 bbls

Cause: Failure of gasket at 8" diameter vertical riser connected to 16" diameter transmission pipeline.

Immediate action: 36" earthen berm constructed around impacted area.

B) 1RP-4498 summary (Spill 2; Fee surface)

Release date: unknown; discovered 8 am MST 11/2/2016

Volume released: 418 bbls produced water and crude oil

Volume recovered: in progress at time of initial C141 submission

Cause: 8" ball valve left open at 8" diameter vertical riser

Immediate action: berm constructed around impacted area.

1RP-4497 & 1RP-4498

- Initial workplan submission: November 18, 2016
- Approved workplan: December 8, 2016
- Delineation and remediation report: February 16, 2017
No documentation of approval
- Additional delineation data submitted: June 13, 2017 and July 21, 2017
Appears to be for 1RP-4497 and 1RP-4498
Field screening using Horiba meter rather than field titration
No documentation of approval
- NMSLO email regarding 1RP-4497 on August 1, 2017 for additional remediation.
- Delineation/remediation status for 1RP-4498 undetermined.
- **Field visit on August 15, 2017, attended by NMSLO, OWL, and KJ Environmental. NMOCD was unable to attend. Attending parties: please provide summary. Status? Resolution?**
- Request for deferral: November 17, 2017
Uncertain for 1RP-4497, 1RP-4498 or both

OWL: needs to provide summary of completed or proposed remedial activities and timeline for 1RP-4497 and 1RP-4498.

- **Deferral for delineation and/or remediation? 1RP-4497 and/or 1RP-4498?**
- **Scaled map to depict clearly the areas for deferral.**

II) 2017 1RPs

A) 1RP-4820 (4" polyline near Hwy 128; State surface)

Release date: 4pm June 13, 2017; discovered 6:15 pm MST June 13, 2017

Volume released: 25 bbls produced water

Volume recovered: 10 bbls

Cause: Failure of 4" aboveground poly flowline

Immediate action: earthen berm constructed around impacted area; placement of a 20 mil liner on top of affected area.

- Initial workplan submission: October 20, 2017
- Approved proposed delineation workplan: November 30, 2016

B) 1RP-4860 (Pigging station, 3.5 miles SW of Bennett; Fee surface)

Release date: 7 am MST October 22, 2017; discovered same

Volume released: 2800 bbls produced water

Volume recovered: 580 bbls

Cause: Nipple failure at pigging station

Immediate action: fluid vacuumed up in from pre-existing trenched area; placement of a 20 mil liner on top of affected area.

- Delineation workplan submitted December 5, 2017

III) Future releases

- Report to all pertinent agencies simultaneously
- Delineation must be approved before commencement of remediation
- Optimal timeframe from notification/1RP issued to closure: 90 days