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

Form C-141

Revised August 8, 2011

## **Release Notification and Corrective Action**

		-	Cicasi	)		ATOR	71001 D	711 7 Initi	al Renort	Final Report	
Name of Company DCP Midstream LP						RATOR					
Address 5301 Sierra Vista						Telephone No. cell 575-361-2406					
Facility Name N-1 Ext						Facility Type Natural Gas Gathering Pipeline					
GC O	Т	C4 11	M:16								
Surface Ow	ner: Trent	Stradley	Mineral C	unknown API No. N/A							
LOCATION OF RELEASE											
Unit Letter	Section 13	Township 20S	Range 37E	Feet from the	North/	South Line	Feet from the	East/West Line		County Lea	
<b>Latitude</b> _ 32			e -103.2	105531							
Type of Rele					Volume of Release 1 BBL			Volume Recovered 0			
Source of Release Pipeline						02-08-18		e	Date and Hour of Discovery 02-08-18 3:00 PM		
☐ Yes ☐ No ☒ Not Required							If YES, To Whom?				
By Whom?						Date and Hour					
Was a Watercourse Reached?  ☐ Yes ☒ No						If YES, Volume Impacting the Watercourse.					
If a Watercourse was Impacted, Describe Fully.* N / A							└──   RECEIVED				
If a Watercou	ırse was Im	pacted, Descr	ibe Fully.	* N / A					'.22 on	n, Mar 05, 2018	
DCPM was n Fencing was	otified of a placed arou	ind leak area t	leak on the protect a	e N-1 Ext in the E	entering	spill area. O				the site and shut in gas. on crew begin to excavate	
Describe Are	a Affected	and Cleanup A	Action Tal	ten.*							
A cleanup pl	an will be s	submitted to C	CD Appro	oval. The excava	tion froi	n the repairs	will be left open u	ıntil rem	ediation ca	an be completed.	
and regulation endanger publication operator of lists surface water	ns all opera lic health o ability shou , human he	tors are required to the environment of the their operations alth, or the en	red to reponent. The tions have wironment	ort and/or file cert acceptance of a C failed to adequat	ain relea C-141 re ely inve MOCD a	nse notification port by the N stigate and re cceptance of a	ns and perform co MOCD marked as mediate contamin a C-141 report do	orrective s "Final action that es not re	e actions for Report" do at pose a the Elieve the o	suant to NMOCD rules r releases which may be not relieve the areat to ground water, perator of responsibility	
							OIL CONSERVATION DIVISION				
Signature: Yvonne Blaix						M_					
Printed Name	e: Yvonne	Blair		Approved by Environmental Specialist:							
Title: Compliance Coordinator						Approval Date: 3/5/2018 Expiration Date:					
E-mail Address: <a href="mailto:ybblair@dcpmidstream.com">ybblair@dcpmidstream.com</a>						Conditions of Approval:  Attached					
Date: 03/01	/18		Phone	: 575-361-2406		see attached directive					

\* Attach Additional Sheets If Necessary

fOY1806428089

1RP-4982

nOY1806428200

pOY1806428500

## Operator/Responsible Party,

The OCD has received the form C-141 you provided on \_3/1/2018\_ regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number \_1RP-4982\_\_ 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 \_4/5/2018\_. 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