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**

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 April 3, 2017

Sunta Pe, 1441 67363														
			Rele	ease	e Notific	catio	and Co	rrective A	ction	1				
				OPERA	ΓOR			al Report		Final Report				
Name of Co				Contact Mark Kramer, Drilling Supervisor										
Address 64				Telephone No. 575-748-3371										
Facility Na	me Fightii	<u>1</u>		Facility Type Oil										
Surface Ow	ner Feder	Mineral (Owner	Federal			API No. 30-025-43267							
					LOC	ATIO	N OF RE	LEASE						
Unit Letter E	Unit Letter Section Township Range Feet from the North									West Line County Lea				
Latitude_32.044366_ Longitude103.516471_ NAD83														
NATURE OF RELEASE														
Type of Release Water Based Mud								Volume of Release Volume 9 bbls 6.5 bbls				Recovered		
Source of Re	lease		Date and Hour of Occurrence Date and				Hour of Discovery							
Flowline nea Was Immedi			March 2, 2018 @ 10:00 AM MST March 2, 2018 @ 10:00 AM MST If YES, To Whom?											
	uic i voilee v	□ Not R	equired	N/A										
By Whom? N/A			Date and Hour N/A											
Was a Water	course Read	ı		If YES, Volume Impacting the Watercourse. N/A										
I.f W	T			RECEIVED										
N/A	urse was im	pacted, Descr	ibe Fully.	r				By Olivia		12:06	pm, Ma	r 16	, 2018	
		em and Reme				OW WAS	divorted to	the gas separate	or Onc	a tha botto	me un rooc	shod er	urface the	
While circulating a bottoms up after tripping in the hole, flow was diverted to the gas separator. Once the bottoms up reached surface, the flow increase caused the section of the flowline nearest the blow out preventer (BOP) to slip out of the hammer union seal. Circulation was														
stopped and the crew re-connected the section of the flow line with the addition of a chain and binder.														
		and Cleanup												
Approximately 9 bbls of water based mud was released to the well pad surface. Clean up of the release commenced immediately through the use of squeegees and a diaphragm pump. Approximately 6.5 bbls of water based mud was recovered. All fluid stayed on the well pad. An environmental														
		cted to assist v							,		•			
								knowledge and t						
								nd perform corre arked as "Final F						
should their	operations h	nave failed to	adequately	inve	estigate and i	remediat	e contaminati	on that pose a th	reat to g	round water	r, surface wa	ater, hu	ıman health	
		nddition, NMC ws and/or regi		otance	e of a C-141	report d	oes not reliev	e the operator of	respons	ibility for c	ompliance v	vith an	y other	
rederal, state	, or local la	ws and/or regi	manons.				OIL CONSERVATION DIVISION							
Signature: Míchael Shoemaker														
Signature. 7	10010000		Approved by Environmental Specialist:											
Printed Nam	e: Michael	Shoemaker												
Title: Enviro	onmental Pr	ofessional				Approval Da	e: 3/16/20	18	Expiration	Date:				
E-mail Address: mike.shoemaker@dvn.com							Conditions of Approval: Attached				/			
Date: Phone: 575 748 2271							see attached directive							

Phone: 575.748.3371

^{*} Attach Additional Sheets If Necessary

Operator/Responsible Party,

The OCD has received the form C-141 you provided on _3/15/2018_ regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number _1RP-4993__ 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 _4/16/2018_. 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; 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

