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.

Release Notification and Corrective Action

OPERATOR	Initial Report	Final Report
Contact Merle Lewis, Production	n Foreman	
Telephone No. 575-748-3371		
Facility Type Oil		
	Contact Merle Lewis, Production Telephone No. 575-748-3371	Contact Merle Lewis, Production Foreman Telephone No. 575-748-3371

Surface Owner Private Mineral Owner Federal API No. 30-025-42920	
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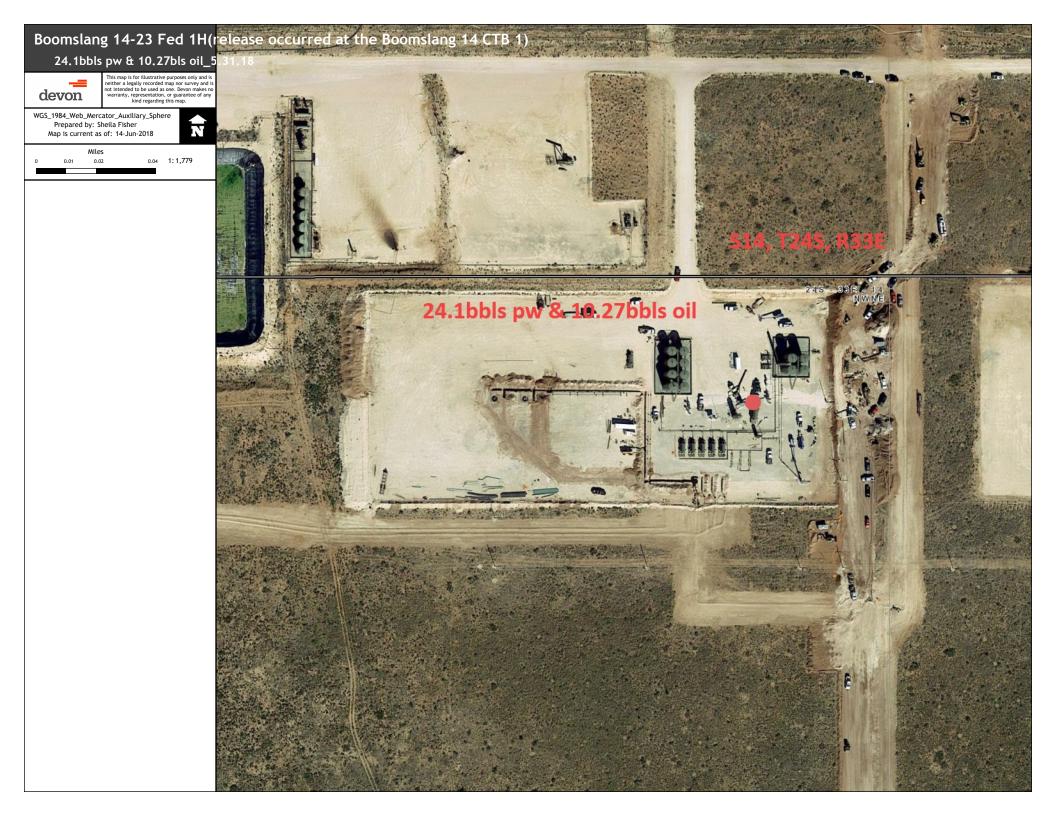
LOCA	TION	OF	REI	LEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
В	14	24S	33E					Lea

Latitude_32.224333_Longitude_103.539605_NAD83

Type of Release	Volume of Release	Volume Recovered	
Produced Water & Oil	24.1bbls produced water & Obbls		
	10.27bbls oil		
Source of Release	Date and Hour of Occurrence Date and Hour of Discovery		
Heater treater	May 31, 2018 @ 4:00 AM MST May 31, 2018 @ 4:00 AM MST		
Was Immediate Notice Given?	If YES, To Whom?		
🛛 Yes 🗌 No 🗌 Not Required			
	BLM-Shelly Tucker		
By Whom? Mike Shoemaker	Date and Hour 05/31/18 @ 10:41 F		
Was a Watercourse Reached?	If YES, Volume Impacting the Watercourse.		
🗌 Yes 🖾 No	N/A		
If a Watana and Income to d Describe Fulles *			
If a Watercourse was Impacted, Describe Fully.* N/A			
N/A	By CHernandez a	at 10:31 am, Jun 15, 2018	
Describe Cause of Problem and Remedial Action Taken.*			
The lease operator arrived on location and found a leak in the fire	tube. The production was switche	ed to another heater to stop the release.	
ľ	Ī	<u>I</u>	
Describe Area Affected and Cleanup Action Taken.*			
Approximately 24.1bbls produced water & 10.27bbls oil were released or	nto the pad. No fluid left location. 0 b	bbls were recovered. An Environmental	
contractor will be contacted to assist with further delineation and remedia			
I hereby certify that the information given above is true and complete to t	the best of my knowledge and understa	and that pursuant to NMOCD rules and	
regulations all operators are required to report and/or file certain release r			
public health or the environment. The acceptance of a C-141 report by the			
should their operations have failed to adequately investigate and remedia			
or the environment. In addition, NMOCD acceptance of a C-141 report of	loes not relieve the operator of response	sibility for compliance with any other	
federal, state, or local laws and/or regulations.			
	OIL CONSERV	VATION DIVISION	
Signature: Sheíla Físher	Approved by Environmental Specialist:		
	Approved by Environmental Specialis	st: C C C	
Printed Name: Sheila Fisher			
	Approval Data: 6/15/2018		
Title: Field Admin Support	Approval Date: 0/15/2010	Expiration Date:	
E-mail Address: Sheila.Fisher@dvn.com	Conditions of Approval:		
	See attached directive		
Date: 6/11/18 Phone: 575.748.1829			
Attach Additional Sheets If Necessary			
Attach Additional Shorts II Novessal y	1RP-5097 nCH18166	34490	
	pCH1816636894		
	IPCITIO10030094		

NATURE OF RELEASE



Operator/Responsible Party,

The OCD has received the form C-141 you provided on _6/14/2018_ regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number _1RP-5097_ 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 _7/15/2018_. 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