

From: Yu, Olivia, EMNRD
To: "John Allen"
Cc: "Jimenez, Yolanda"; Hernandez, Christina, EMNRD
Subject: RE: C-141 for produced water spill
Date: Tuesday, September 25, 2018 7:41:00 AM
Attachments: 1RP5202_C-141 BTA prod water spill 9-11-18.pdf

Good morning Mr. Allen:

Notes:

- Please confirm the release location. The release GPS coordinates provided on 19 Sept 2018 were 32.05356, -103.60563 at the location of 30-025-42462. However, on the C-141 form, the GPS coordinates are for a release on the adjacent well pad of 30-028-42125.
- According to NMOCD databases, the release point is on Fee surface and mineral ownerships. However, the portion of the release running into a draw, crossing into Section 8 is Federal surface and minerals ownership. BLM can verify.
- Release occurred in a Medium cave karst region and release impacted a watercourse. Please address this release as high priority.

Please be advised that

1. The initial portion of the C-141 form does not include the calculations to determine the release volume. Visual estimation is not sufficient nor adequate. Please submit measurements in volume estimation; including dimensions, soil parameters (porosity, texture, bulk density, etc).
2. Provide dated, geo-referenced photo documentation for verification that the initial response activities have been employed to contain the release.
3. Per 19.15.29.10 NMAC, a major release necessitates immediate notification to NMOCD Environmental Bureau chief, in addition to District office.
4. Per 19.15.29.13 NMAC, regulations of corresponding agencies supersede NMOCD's.

The 1RP for this incident is

5202	9/24/2018	A	BTA oil	Mesa B #2 SWD	30-025-42462	26S-33E-7P	9/11/2018
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Please remember to include this 1RP identifier to all communications. Revised NMAC 19.15.29 was effective on August 14, 2018. Delineate and remediate per regulation. Mind the timelines for submittal of requisite information.

Please be advised that NMOCD recommends a completed site characterization/delineation report be reviewed or approved by NMOCD BEFORE any significant remediation work towards closure.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
Olivia.yu@state.nm.us
575-393-6161 x113

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: John Allen <JAllen@btaoil.com>
Sent: Thursday, September 20, 2018 11:18 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: C-141 for produced water spill

Hi Olivia,

We spoke yesterday about a produced water spill at a SWD. The first 2 pages of form C-141 are attached.

John Allen
Environmental Manager
BTA Oil Producers
104 S Pecos St.
Midland, TX 79701
Cell: 432-701-5808
Office: 432-682-3753 x121