

From: [Yu, Olivia, EMNRD](#)
To: ["llivesay@swrpermian.com"](mailto:llivesay@swrpermian.com)
Cc: [Hernandez, Christina, EMNRD](#); [Griswold, Jim, EMNRD](#)
Subject: Release at Flying M SA Unit #2
Date: Friday, September 28, 2018 11:11:00 AM
Attachments: 1RP5214_initialC141_3002524692_pipeline.pdf

Ms. Livesay:

Notes:

- The site name given Flying M SA Unit #2 is not in the vicinity of the release location. Also, please verify that the 4-inch truck line from the battery is going to Flying M SA Unit #2 (30-025-34234), which is not an injection well as written. The nearest well to the release location is Flying M SA Unit #241 (30-025-24692), which is an injection well and will be used for documentation.
- Recovery volume is rarely 100% even for releases in lined containments.

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). Without this information for verification, NMOCD will consider the release as having an unknown volume.
2. Dated, geo-referenced photo documentation for verification that the initial response activities have been employed to contain the release is requested.
3. Per 19.15.29.10 NMAC, a major release necessitates immediate notification to NMOCD Environmental Bureau chief (cc'd), in addition to the appropriate District office. Please direct release notifications- verbal via voicemail or email- to Environmental Specialists in the District offices.

The 1RP for this incident is

5214	9/28/2018	A	Southwest Royalties	Flying M SA Unit 4" trunk line	30-025-24692	9S-33E-29K	9/25/2018
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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.