

Harimon, Jocelyn, EMNRD

From: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Sent: Tuesday, April 3, 2018 1:31 PM
To: Karrigan, Callie N. (MRO); Bratcher, Mike, EMNRD
Cc: Mann, Ryan
Subject: [External] RE: Marathon Oil - Aid State 2 Initial C141
Attachments: 2. 4637 - COAs and signed C-141 Initial.pdf

Beware of links/attachments.

RE: Marathon * Aid State #2 * 30-015-37068 * 2RP-4637

Callie,

I have included a scanned copy of the signed Initial C-141 Remediation Permit along with an attached Conditions of Approval (COA). The OCD tracking number for this event is 2RP-4637, please refer to this tracking number on any and all submissions sent in to the OCD. I see that a Final C-141 was submitted by you Callie on 3/20/18 for this release so this email send is more or less just for your records. OCD is pretty behind on processing Final C-141s so it may be a while till we get to it. Thanks in advance for your patience. I will say you will probably need to send on that email with the Final C-141 form to Ryan Mann from SLO as well since I see according to my records that this site is SLO administered surface.

Thank you,

Crystal Weaver

Environmental Specialist
OCD – Artesia District II
811 S. 1st Street
Artesia, NM 88210
Office: 575-748-1283 ext. 101
Cell: 575-840-5963
Fax: 575-748-9720

From: Karrigan, Callie N. (MRO) <cnkarrigan@marathonoil.com>
Sent: Monday, February 26, 2018 4:38 PM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Subject: FW: Marathon Oil - Aid State 2 Initial C141

Crystal and Mike,

Please see the attachment for the initial C141.

Please let me know if you have any questions.

Callie

From: Karrigan, Callie N. (MRO)
Sent: Friday, February 23, 2018 3:32 PM
To: 'mike.bratcher@state.nm.us' <mike.bratcher@state.nm.us>; 'crystal.weaver@state.nm.us' <crystal.weaver@state.nm.us>
Subject: Marathon Oil - Aid State 2 24 hour notification

Crystal and Mike,

I wanted to let you know we had a release at the Aid State 2 reported by the operator at approximately 10:01 am. The Operator arrived onsite and observed standing fluids in tank containment due to a leak in the Victaulic coupling on the transfer pump. Approximately 15 bbls produced water was released into lined tank containment. A vac truck was dispatched immediately to recover standing fluids. The well is shut-in pending repairs scheduled for tomorrow morning.

Please let me know if you have any questions.

Thank you,

Callie Karrigan
Marathon Oil Company
HES Professional - Environmental
2423 Bonita Street
Phone: 575-297-0691
Cell: 405-202-1028

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 Department

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party	OGRID
Contact Name	Contact Telephone
Contact email	Incident # (assigned by OCD)
Contact mailing address	

Location of Release Source

Latitude _____ Longitude _____
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	Site Type
Date Release Discovered	API# (if applicable)

Unit Letter	Section	Township	Range	County

Surface Owner: ☐ State ☐ Federal ☐ Tribal ☐ Private (Name: _____)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of total dissolved solids (TDS) in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? <input type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?	

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

<input type="checkbox"/> The source of the release has been stopped.	
<input type="checkbox"/> The impacted area has been secured to protect human health and the environment.	
<input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.	
<input type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why:	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
Printed Name: _____	Title: _____
Signature: <u>Callie Kerrigan</u>	Date: _____
email: _____	Telephone: _____
<u>OCD Only</u>	
Received by: _____	Date: _____

Incident ID	
District RP	
Facility ID	
Application ID	

Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

Closure Report Attachment Checklist: *Each of the following items must be included in the closure report.*

- ☐ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☐ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☐ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☐ Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: _____ Title: _____

Signature: Callie Kerrigan Date: _____

email: _____ Telephone: _____

OCD Only

Received by: Jocelyn Harimon Date: 03/07/2023

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by:  Date: 03/07/2023

Printed Name: Jocelyn Harimon Title: Environmental Specialist

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
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1000 Rio Brazos Road, Aztec, NM 87410
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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

NM OIL CONSERVATION

ARTESIA DISTRICT

Form C-141

Revised April 3, 2017

FEB 26 2018

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

RECEIVED

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company Marathon Oil Permian LLC 372098	Contact Callie Karrigan
Address 2423 Bonita St, Carlsbad NM 88220	Telephone No. 405-202-1028 (cell) 575-297-0956 (office)
Facility Name: Aid State 2	Facility Type Oil and gas production facilities

Surface: Owner:	Mineral: Owner:	API No. : 30-015-37068
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LOCATION OF RELEASE

Unit Letter O	Section 13	Township 17S	Range 28E	Feet from the 330	North/South Line South	Feet from the 1650	East/West Line East	County Eddy
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Latitude 32.829358 Longitude -104.126266

NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: 15 bbls	Volume Recovered: 10 bbls
Source of Release: transfer pump	Date and Hour of Occurrence unknown	Date and Hour of Discovery 02/23/2018 10:01 am
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Crystal Weaver and Mike Bratcher – Eddy County	
By Whom? Callie Karrigan	Date and Hour 02/23/2018 3:32 pm	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. N/A	

If a Watercourse was Impacted, Describe Fully.*
Not applicable.


Describe Cause of Problem and Remedial Action Taken.*

Operator arrived onsite during his daily rounds and observed standing fluids in tank containment due to a leak in the Victaulic coupling on the transfer pump. Approximately 15 bbls produced water was released into lined tank containment. A roustabout crew was dispatched immediately to repair the coupling on the transfer pump.

Describe Area Affected and Cleanup Action Taken.*

The entirety of the affected area was in tank containment with standing fluids in sections of 80'x25' and 25'x40. A vac truck was immediately dispatched to recover standing fluids. Affected rock/gravel in containment will be removed. Absorbent pads will be used to recover residual fluids before and after the liner is pressure washed.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Callie Karrigan Signature:	OIL CONSERVATION DIVISION	
Printed Name: Callie Karrigan	Approved by Environmental Specialist 	
Title: HES Environmental Professional	Approval Date: 2/27/18	Expiration Date: N/A
E-mail Address: cnkarrigan@marathonoil.com	Conditions of Approval:	
Date: Phone: 405-202-1028(cell) 575-297-0956 (office)	See attached	Attached <input type="checkbox"/> 2RP-4637

* Attach Additional Sheets If Necessary

Operator/Responsible Party,

The OCD has received the form C-141 you provided on 2/26/2018 regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 2RP-4637 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 division-approved corrective action 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 2 office in ARTESIA on or before 3/26/2018. 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

Bratcher, Mike, EMNRD

From: Karrigan, Callie N. (MRO) <cnkarrigan@marathonoil.com>
Sent: Monday, February 26, 2018 4:38 PM
To: Weaver, Crystal, EMNRD; Bratcher, Mike, EMNRD
Subject: FW: Marathon Oil - Aid State 2 Initial C141
Attachments: Initial C-141 Form Marathon Oil.doc

Crystal and Mike,

Please see the attachment for the initial C141.

Please let me know if you have any questions.

Callie

From: Karrigan, Callie N. (MRO)
Sent: Friday, February 23, 2018 3:32 PM
To: 'mike.bratcher@state.nm.us' <mike.bratcher@state.nm.us>; 'crystal.weaver@state.nm.us' <crystal.weaver@state.nm.us>
Subject: Marathon Oil - Aid State 2 24 hour notification

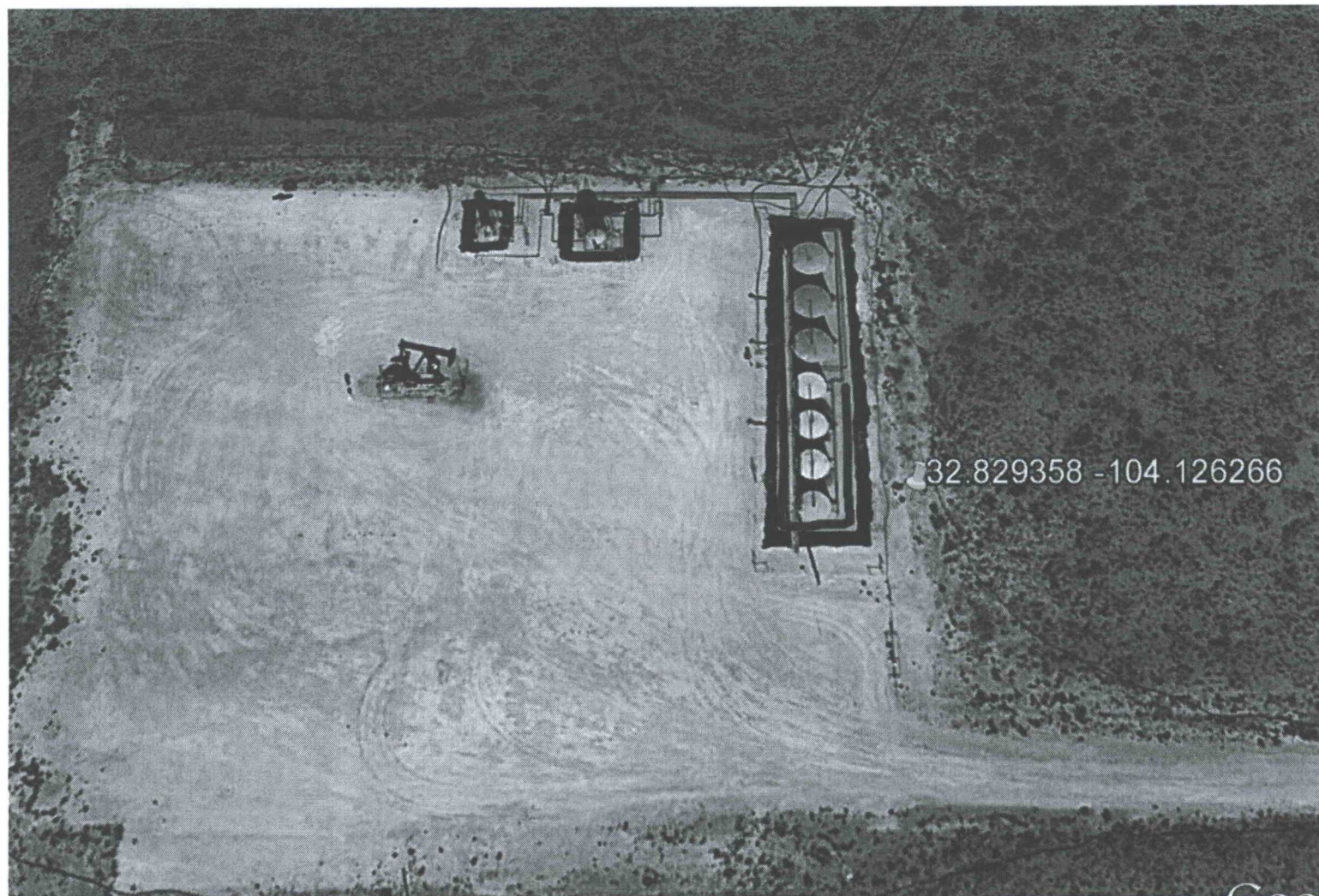
Crystal and Mike,

I wanted to let you know we had a release at the Aid State 2 reported by the operator at approximately 10:01 am. The Operator arrived onsite and observed standing fluids in tank containment due to a leak in the Victaulic coupling on the transfer pump. Approximately 15 bbls produced water was released into lined tank containment. A vac truck was dispatched immediately to recover standing fluids. The well is shut-in pending repairs scheduled for tomorrow morning.

Please let me know if you have any questions.

Thank you,

Callie Karrigan
Marathon Oil Company
HES Professional - Environmental
2423 Bonita Street
Phone: 575-297-0691
Cell: 405-202-1028



Weaver, Crystal, EMNRD

From: Karrigan, Callie N. (MRO) <cnkarrigan@marathonoil.com>
Sent: Friday, February 23, 2018 3:32 PM
To: Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD
Subject: Marathon Oil - Aid State 2 24 hour notification

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State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised April 3, 2017
Submit 1 Copy to appropriate District Office in
accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☒ Final Report

Name of Company Marathon Oil Permian LLC	Contact Callie Karrigan
Address 2423 Bonita St, Carlsbad NM 88220	Telephone No. 405-202-1028 (cell) 575-297-0956 (office)
Facility Name: Aid State 2	Facility Type Oil and gas production facilities
Surface: Owner:	Mineral: Owner:
API No. : 30-015-37068	

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
O	13	17S	28E	330	South	1650	East	Eddy

Latitude 32.829358 Longitude -104.126266

NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: 15 bbls	Volume Recovered: 15 bbls
Source of Release: transfer pump	Date and Hour of Occurrence unknown	Date and Hour of Discovery 02/23/2018 10:01 am
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Crystal Weaver and Mike Bratcher – Eddy County	
By Whom? Callie Karrigan	Date and Hour 02/23/2018 3:32 pm	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. N/A	
If a Watercourse was Impacted, Describe Fully.* Not applicable.		
Describe Cause of Problem and Remedial Action Taken.* Operator arrived onsite during his daily rounds and observed standing fluids in tank containment due to a leak in the Victaulic coupling on the transfer pump. Approximately 15 bbls produced water was released into lined tank containment. A roustabout crew was dispatched immediately to repair the coupling on the transfer pump.		
Describe Area Affected and Cleanup Action Taken.* The entirety of the affected area was in tank containment with standing fluids in sections of 80'x25' and 25'x40. A vac truck was immediately dispatched to recover standing fluids. Affected rock/gravel in containment was removed and disposed at R360. Absorbent pads were used to recover residual fluids before and after the liner is pressure washed. The liner was assessed for any tears or holes prior to the replacement of new rock material in containment.		
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.		
Callie Karrigan Signature:	<u>OIL CONSERVATION DIVISION</u>	
Printed Name: Callie Karrigan	Approved by Environmental Specialist:	
Title: HES Environmental Professional	Approval Date:	Expiration Date:
E-mail Address: cnkarrigan@marathonoil.com	Conditions of Approval:	
Date: 03/20/2018 Phone: 405-202-1028(cell) 575-297-0956 (office)	Attached <input type="checkbox"/>	

* Attach Additional Sheets If Necessary



Post Clean-Up





District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
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NM OIL CONSERVATION

ARTESIA DISTRICT

FEB 26 2018

Form C-141
Revised April 3, 2017Submit 1 Copy to appropriate District Office in
accordance with 19.15.29 NMAC.

RECEIVED

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

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Address 2423 Bonita St, Carlsbad NM 88220	Telephone No. 405-202-1028 (cell) 575-297-0956 (office)
Facility Name: Aid State 2	Facility Type Oil and gas production facilities

Surface: Owner:	Mineral: Owner:	API No. : 30-015-37068
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LOCATION OF RELEASE

Unit Letter O	Section 13	Township 17S	Range 28E	Feet from the 330	North/South Line South	Feet from the 1650	East/West Line East	County Eddy
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Latitude 32.829358 Longitude -104.126266

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By Whom? Callie Karrigan	Date and Hour 02/23/2018 3:32 pm	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. N/A	

If a Watercourse was Impacted, Describe Fully.*
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Describe Cause of Problem and Remedial Action Taken.*

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Callie Karrigan Signature:	OIL CONSERVATION DIVISION	
Printed Name: Callie Karrigan	Approved by Environmental Specialist: <i>[Signature]</i>	
Title: HES Environmental Professional	Approval Date: 2/27/18	Expiration Date: N/A
E-mail Address: cnkarrigan@marathonoil.com	Conditions of Approval:	
Date: Phone: 405-202-1028(cell) 575-297-0956 (office)	See attached	Attached <input type="checkbox"/> 2RP-4637

* Attach Additional Sheets If Necessary

Operator/Responsible Party,

The OCD has received the form C-141 you provided on 2/26/2018 regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 2RP-4637 has been assigned. Please refer to this case number in all future correspondence.

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The responsible person shall complete division-approved corrective action 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 2 office in ARTESIA on or before 3/26/2018. 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

Bratcher, Mike, EMNRD

From: Karrigan, Callie N. (MRO) <cnkarrigan@marathonoil.com>
Sent: Monday, February 26, 2018 4:38 PM
To: Weaver, Crystal, EMNRD; Bratcher, Mike, EMNRD
Subject: FW: Marathon Oil - Aid State 2 Initial C141
Attachments: Initial C-141 Form Marathon Oil.doc

Crystal and Mike,

Please see the attachment for the initial C141.

Please let me know if you have any questions.

Callie

From: Karrigan, Callie N. (MRO)
Sent: Friday, February 23, 2018 3:32 PM
To: 'mike.bratcher@state.nm.us' <mike.bratcher@state.nm.us>; 'crystal.weaver@state.nm.us' <crystal.weaver@state.nm.us>
Subject: Marathon Oil - Aid State 2 24 hour notification

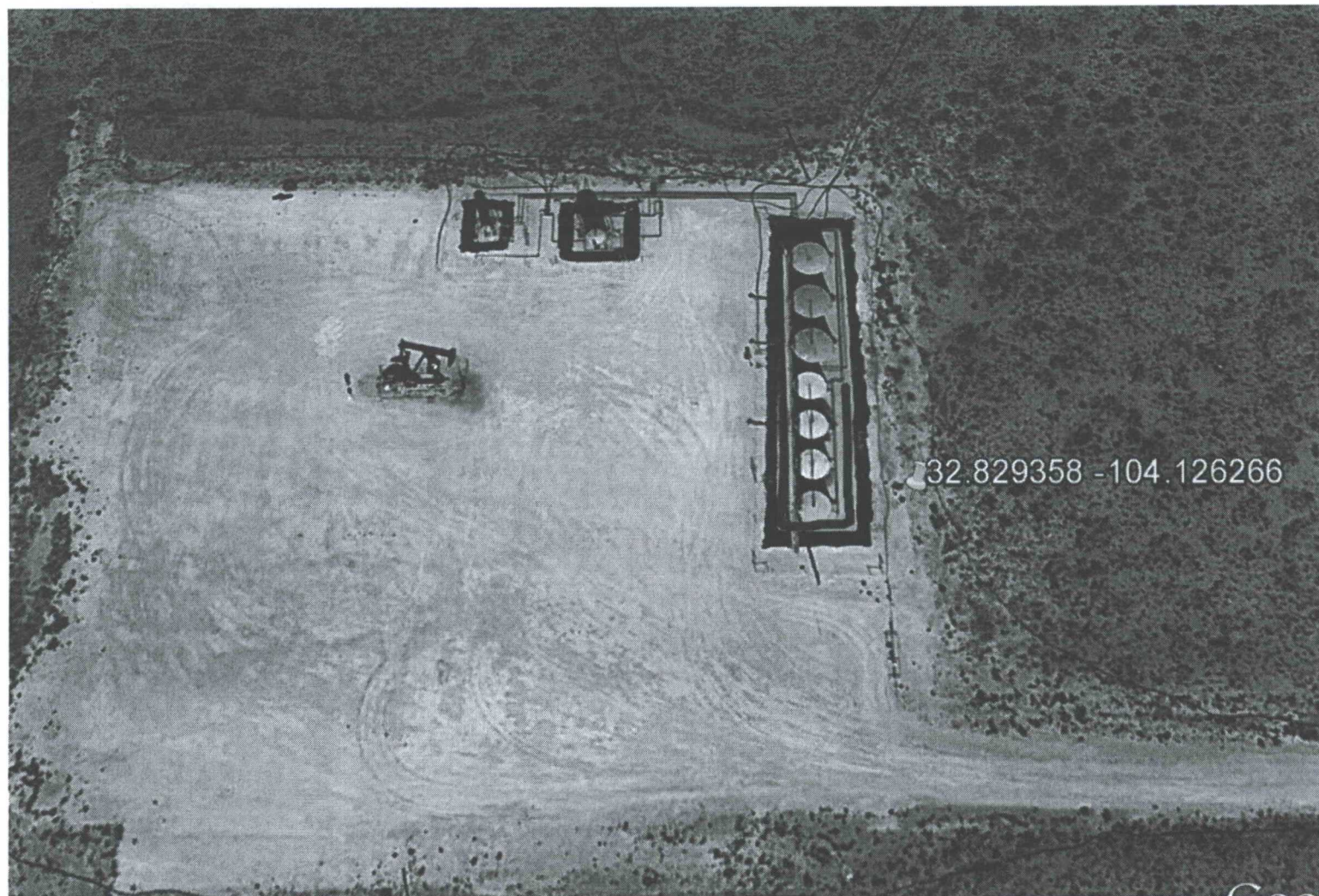
Crystal and Mike,

I wanted to let you know we had a release at the Aid State 2 reported by the operator at approximately 10:01 am. The Operator arrived onsite and observed standing fluids in tank containment due to a leak in the Victaulic coupling on the transfer pump. Approximately 15 bbls produced water was released into lined tank containment. A vac truck was dispatched immediately to recover standing fluids. The well is shut-in pending repairs scheduled for tomorrow morning.

Please let me know if you have any questions.

Thank you,

Callie Karrigan
Marathon Oil Company
HES Professional - Environmental
2423 Bonita Street
Phone: 575-297-0691
Cell: 405-202-1028



Weaver, Crystal, EMNRD

From: Karrigan, Callie N. (MRO) <cnkarrigan@marathonoil.com>
Sent: Friday, February 23, 2018 3:32 PM
To: Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD
Subject: Marathon Oil - Aid State 2 24 hour notification

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Thank you,

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Marathon Oil Company
HES Professional - Environmental
2423 Bonita Street
Phone: 575-297-0691
Cell: 405-202-1028

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1625 N. French Dr., Hobbs, NM 88240
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District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 190901

CONDITIONS

Operator: LONGFELLOW ENERGY, LP 8115 Preston Road Dallas, TX 75225	OGRID: 372210
	Action Number: 190901
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

Created By	Condition	Condition Date
jharimon	None	3/7/2023