

ARTESIA DISTRICT

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

JUL 08 2015

Form C-141
Revised August 8, 2011

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

RECEIVED
Copy to appropriate District Office in
accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

AB1519556419 OPERATOR ☒ Initial Report ☐ Final Report

Name of Company: BOPCO, L.P. 3402737 Contact: Bradley Blevins

Address: 522 W. Mermod, Suite 704 Carlsbad, N.M. 88220 Telephone No. 575-887-7329

Facility Name: PLU CVX JV BS 016H Facility Type: Exploration and Production

Surface Owner: Federal Mineral Owner: API No. 3001540581

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
O	3	25S	30E	200		2130		Eddy

Latitude 32.153395 Longitude 103.867621

NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: 9 barrels	Volume Recovered: 2 barrels
Source of Release: Corrosion to steel connection	Date and Hour of Occurrence: 6-30-2015 @ 11:00am	Date and Hour of Discovery: 6-30-2015 @ 12:06pm
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

BOPCO EHS was notified of a release the occurred due to corrosion of a steel connection on the flowline. A vacuum truck was called to the location and recovered 2 barrels of produced water.

Describe Area Affected and Cleanup Action Taken.*

A vacuum truck recovered 2 barrels of produced water.

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.

Signature: <u>Bradley Blevins</u>	OIL CONSERVATION DIVISION	
Printed Name: Bradley Blevins	Signed By <u>M. L. Blevins</u> Approved by Environmental Specialist:	
Title: Assistant Remediation Foreman	Approval Date: <u>7/14/15</u>	Expiration Date: <u>N/A</u>
E-mail Address: bblevins@basspet.com	Conditions of Approval:	
Date: <u>7-8-2015</u> Phone: 432-214-3704	Remediation per O.C.D. Rules & Guidelines Attached <input type="checkbox"/>	
SUBMIT REMEDIATION PROPOSAL NO		
LATER THAN: <u>8/14/15</u>		

* Attach Additional Sheets If Necessary

2RP-3103

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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	nAB1519556419
District RP	2RP-3103
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party XTO Energy, Inc.	OGRID: 5380
Contact Name: Kyle Littrell	Contact Telephone: 432-221-7331
Contact email: Kyle_Littrell@xtoenergy.com	Incident # (assigned by OCD): 2RP-3103
Contact mailing address: 522 West Mermod, Suite 704, Carlsbad, NM 88220	

Location of Release Source

Latitude 32.153395 Longitude -103.867621
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: PLU CVX JV BS 016H	Site Type: Exploration and Production
Date Release Discovered: June 30, 2015	API# (if applicable): 30-015-40581

Unit Letter	Section	Township	Range	County
O	3	25S	30E	Eddy

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)

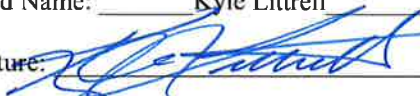
<input type="checkbox"/> Crude Oil	Volume Released (bbls):	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls): 9	Volume Recovered (bbls): 2
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input 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: The former operator BOPCO, was notified of a release that occurred due to corrosion of a steel connection on the flowline. A vacuum truck was called to the location and recovered 2 barrels of produced water.

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

Initial Response

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

<div><input checked="" type="checkbox"/> The source of the release has been stopped.</div> <div><input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment.</div> <div><input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.</div> <div><input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.</div>	
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: <u>Kyle Littrell</u>	Title: <u>SH&E Coordinator</u>
Signature: 	Date <u>2/11/2019</u>
email: <u>Kyle_Littrell@xtoenergy.com</u>	Telephone: <u>(432)-221-7331</u>
<u>OCD Only</u>	
Received by: _____	Date: _____

Incident ID	nAB1519556419
District RP	2RP-3103
Facility ID	
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Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	<u>>100</u> (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas not on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

Characterization Report Checklist: *Each of the following items must be included in the report.*

- ☒ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☒ Field data
- ☒ Data table of soil contaminant concentration data
- ☒ Depth to water determination
- ☒ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- ☒ Boring or excavation logs
- ☒ Photographs including date and GIS information
- ☒ Topographic/Aerial maps
- ☒ Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

Oil Conservation Division

Incident ID	nAB1519556419
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Printed Name: Garrett Green Title: SSHE Coordinator

Signature:  Date: 06/28/2023

email: garrett.green@exxonmobil.com Telephone: 575-200-0729

OCD Only

Received by: Shelly Wells Date: 6/29/2023

Incident ID	nAB1519556419
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Remediation Plan

Remediation Plan Checklist: *Each of the following items must be included in the plan.*

- ☒ Detailed description of proposed remediation technique
- ☒ Scaled sitemap with GPS coordinates showing delineation points
- ☒ Estimated volume of material to be remediated
- ☒ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☒ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- ☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- ☐ Extents of contamination must be fully delineated.
- ☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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Printed Name: Garrett GreenTitle: SSHE Coordinator Date:Signature: 6-28-2023email: garrett.green@exxonmobil.comTelephone: 575-200-0729**OCD Only**Received by: Shelly Wells Date: 6/29/2023☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral ApprovedSignature: Date: 06/30/2023



June 28, 2023

New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

**Re: Remediation Work Plan
PLU CVX JV BS 016H
Incident Number nAB1519556419
Eddy County, New Mexico**

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of XTO Energy, Inc. (XTO), has prepared the following *Remediation Work Plan (Work Plan)* as a follow up to the *Closure Request* dated February 11, 2019. This *Work Plan* proposes to complete additional depth to groundwater determination activities at the PLU CVX JV BS 016H (Site) in response to the New Mexico Oil Conservation Division (NMOCD) denial of the February 11, 2019, *Closure Request*. In the denial, NMOCD expressed concern that depth to groundwater was not adequately determined. The following *Work Plan* proposes to install a soil boring within 0.5 miles of the Site to investigate depth to groundwater and confirm the Closure Criteria at the Site.

SITE DESCRIPTION AND RELEASE SUMMARY

The Site is located in Unit O, Section 3, Township 25 South, Range 30 East, in Eddy County, New Mexico (32.153395°, -103.867621°) and is associated with oil and gas exploration and production operations on Federal land managed by the Bureau of Land Management (BLM).

On June 30, 2015, corrosion of a steel connection on a flow line resulted in the release of approximately 9 barrels (bbls) of produced water. Approximately 2 bbls of free-standing produced water were recovered using a vacuum truck. The former operator reported the release to the NMOCD on a Release Notification and Corrective Action Form C-141 (Form C-141) on July 8, 2015. The release was assigned Remediation Permit (RP) Number 2RP-3103 and Incident Number nAB1519556419.

The release was included in the Compliance Agreement for Remediation for Historical Releases (Compliance Agreement) between XTO and the NMOCD effective November 13, 2018. The purpose of the Compliance Agreement was to ensure that reportable releases that occurred prior to August 14, 2018, where XTO is responsible for the corrective action, comply with Title 19, Chapter 15, Part 29 (19.15.29) of the New Mexico Administrative Code (NMAC) as amended on August 14, 2018.

BACKGROUND

The February 11, 2019, Closure Request detailed site characterization according to Table I, Closure Criteria for Soils Impacted by a Release, of 19.15.29 NMAC. Results from the characterization desktop review are presented on page 3 of the Form C-141, Site Assessment/Characterization. Potential Site receptors are identified on Figure 1.

XTO Energy, Inc.
Remediation Work Plan
PLU CVX JV BS 016H

Based on the results of the Site Characterization, the following NMOCD Table I Closure Criteria (Closure Criteria) were applied:

- Benzene: 10 milligrams per kilogram (mg/kg)
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX): 50 mg/kg
- Total petroleum hydrocarbons (TPH)-gasoline range organics (GRO) and TPH-diesel range organics (DRO): 1,000 mg/kg
- TPH: 2,500 mg/kg
- Chloride: 20,000 mg/kg

Between February 2018 and July 2018, delineation and excavation activities were conducted at the Site to address the impacted soil resulting from the June 30, 2015, produced water release. Closure was requested on February 11, 2019, based on laboratory analytical results for the excavation and delineation soil samples indicating benzene, BTEX, GRO/DRO, TPH, and chloride concentrations were compliant with the Site Closure Criteria. Additional details regarding the delineation and excavation activities can be referenced in the February 11, 2019, *Closure Request*.

On March 23, 2023, NMOCD denied the *Closure Request* for Incident Number nAB1519556419 for following reason:

- *The depth to groundwater has not been adequately determined. When nearby wells are used to determine depth to groundwater, the wells should be no further than ½ mile away from the site, and data should be no more than 25 years old, and well construction information should be provided in the submission. The responsible party may choose to remediate to the most stringent levels listed in Table 1 of 19.15.29 NMAC in lieu of drilling to determine the depth to groundwater.*

The NMOCD *preference* for wells used for depth to groundwater determination to be no further than 0.5 miles away from the site with data less than 25 years old was not in place at the time of the original soil sampling and reporting activities. The original *Closure Request* was submitted on February 11, 2019, prior to the September 6, 2019, publication of the Procedures for Implementation of the Spill Rule guidance document that clarified the depth to groundwater determination preferences (Section IX.a.).

PROPOSED REMEDIATION WORKPLAN

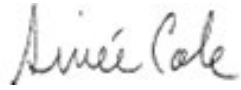
In order to confirm depth to groundwater is greater than 100 feet bgs at the Site, XTO proposes to advance a soil boring to a depth of 105 feet bgs within 0.5 miles of the Site. A field geologist will log and describe soils continuously. The soil boring will be left open for over 72 hours to allow for equilibration of groundwater levels within the temporary boring casing. After the 72-hour waiting period, depth to groundwater will be assessed and the soil boring will be backfilled following New Mexico Office of the State Engineer (NMOSE) approved procedures. A well record or soil boring log will be included in the follow up Closure Report.

XTO will complete the soil boring within 90 days of the date of approval of this *Work Plan* by the NMOCD and submit a *Closure Request Addendum* within 30 days of completing the soil boring. XTO believes this *Work Plan* is protective of human health, the environment, and groundwater and respectfully requests approval of this *Work Plan* for Incident Number nAB1519556419.

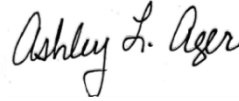
XTO Energy, Inc.
Remediation Work Plan
PLU CVX JV BS 016H

If you have any questions or comments, please contact Ms. Tacoma Morrissey at (337) 257-8307 or tmorrissey@ensolum.com.

Sincerely,
Ensolum, LLC



Aimee Cole
Senior Managing Scientist



Ashley Ager, P.G.
Program Director

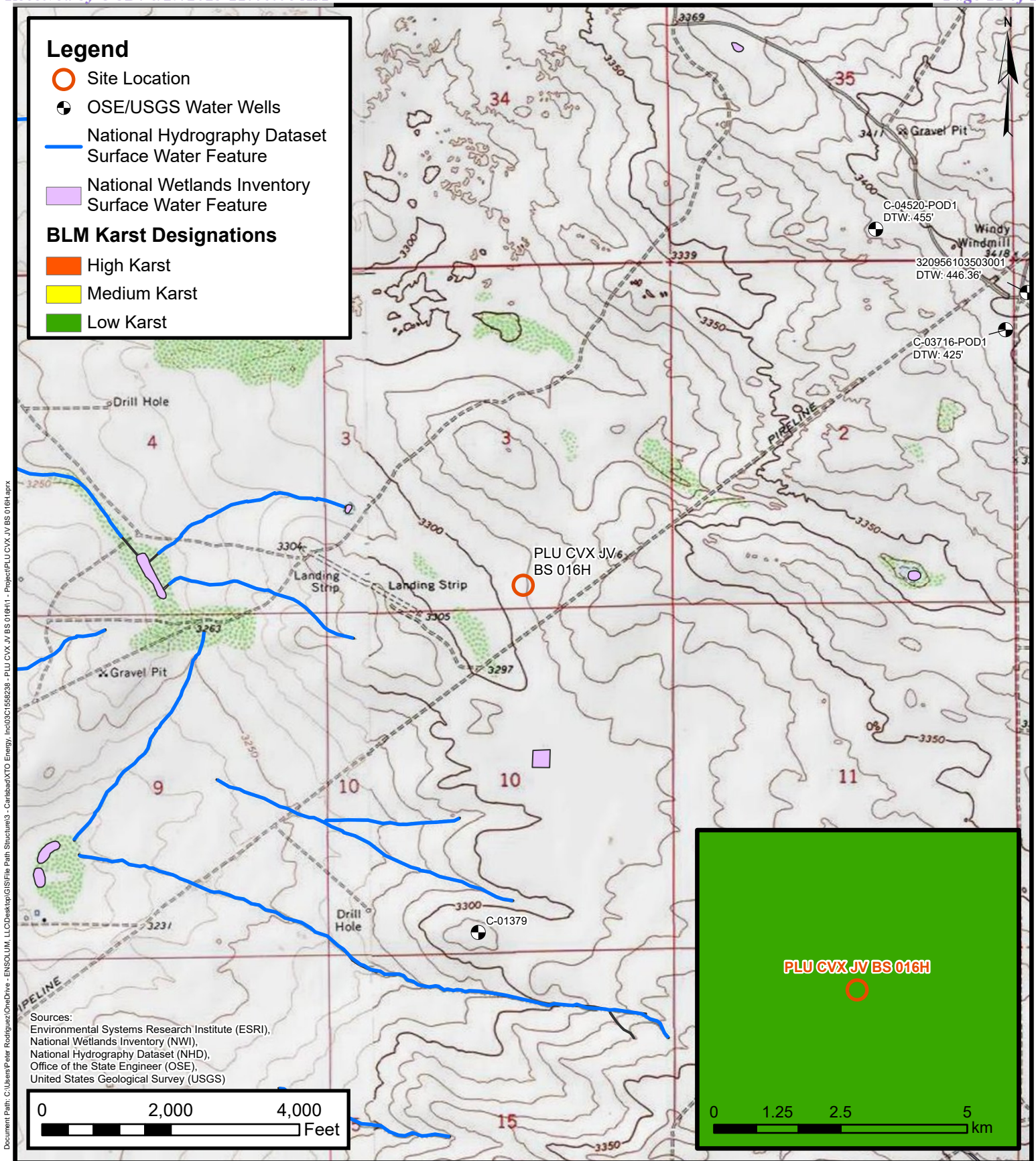
cc: Garrett Green, XTO
Shelby Pennington, XTO
Bureau of Land Management

Appendices:

Figure 1 Site Receptor Map



FIGURES



Site Receptor Map

XTO Energy, Inc.

PLU CVX JV BS 016H

Incident Number: NAB1519556419

Unit O, Section 3, T25S, R30E
 Eddy County, New Mexico

FIGURE

1



District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
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 234413

CONDITIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 234413
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
amaxwell	None	6/30/2023