

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

OCT 12 2016

Form C-141  
Revised August 8, 2011

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.

RECEIVED

## Release Notification and Corrective Action

NAB1028728258

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: BOPCO, L.P. <i>260737</i>	Contact: Bradley Blevins
Address: 522 W. Mermod, Suite 704 Carlsbad, N.M. 88220	Telephone No. 575-887-7329
Facility Name: PLU CVX JV RR 006H	Facility Type: Exploration and Production

Surface Owner: Federal	Mineral Owner: Federal	API No. 3001540580
------------------------	------------------------	--------------------

## LOCATION OF RELEASE

Unit Letter D	Section 21	Township 25S	Range 30E	Feet from the 125	North/South Line	Feet from the 400	East/West Line	County Eddy
------------------	---------------	-----------------	--------------	----------------------	------------------	----------------------	----------------	----------------

Latitude: 32.122643 Longitude: 103.893491

## NATURE OF RELEASE

Type of Release: Crude Oil/ Produced Water	Volume of Release: 13 barrels oil and 25 barrels PW	Volume Recovered: 10 barrels oil and 15 barrels PW
Source of Release: Tee connection failed on wellhead.	Date and Hour of Occurrence: 10-10-16 @ 10:00am	Date and Hour of Discovery: 10-10-16 @ 10:30am
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Mike Bratcher, Heather Patterson, Jim Amos BLM	
By Whom? Bradley Blevins	Date and Hour: 10-10-16 @ 12:09pm	
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.\*

A tee connection failed on the wellhead releasing oil and produced water to the well pad, a light mist to pasture area. A vacuum truck was called to the location and was able to recover 25 barrels of oil and PW mix. The connection was replaced and the well was put back online

Describe Area Affected and Cleanup Action Taken.\*

An initial response crew will be dispatched to the location to conduct an initial scrape of the location and sampling event. The failed connection was replaced and the well was put back online.

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: <i>Bradley Blevins</i>	OIL CONSERVATION DIVISION	
Printed Name: Bradley Blevins	Signed By <i>Mike Bratcher</i> Approved by Environmental Specialist:	
Title: Assistant Remediation Foreman	Approval Date: <i>10/13/16</i>	Expiration Date: <i>N/A</i>
E-mail Address: bblevins@basspet.com	Conditions of Approval: Remediation per O.C.D. Rules & Guidelines	
Date: <i>10/12/16</i> Phone: 432-214-3704	Attached <input type="checkbox"/> SUBMIT REMEDIATION PROPOSAL NO LATER THAN: <i>11/13/16</i>	

\* Attach Additional Sheets If Necessary

22P-3937

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	nAB1628728258
District RP	2RP-3937
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 #: 2RP-3937
Contact mailing address: 522 W. Mermod, Suite 704 Carlsbad, NM 88220	

### Location of Release Source

Latitude N 32.122643 Longitude W -103.893491  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: PLU CVX JV RR 006H	Site Type: Production Well Facility
Date Release Discovered: 10/10/2016	API# (if applicable): 30-015-40580

Unit Letter	Section	Township	Range	County
D	21	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 checked="" type="checkbox"/> Crude Oil	Volume Released (bbls): 13	Volume Recovered (bbls): 10
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls): 25	Volume Recovered (bbls): 15
	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

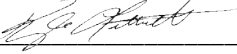
A tee connection failed on the wellhead releasing oil and produced water to the well pad and light mist to the pasture area.

Incident ID	nAB1628728258
District RP	2RP-3937
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC?  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? Release volume greater than 25 bbls.
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? By Bradley Belvins to Mike Bratcher (NMOCD), Heather Patterson, and Jim Amos (BLM) on 10-10-2016 at 12:09 pm.	

### Initial Response

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

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" 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: N/A	
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&amp;E Supervisor</u>
Signature: 	Date: <u>10/25/2019</u>
email: <u>Kyle_Littrell@xtoenergy.com</u>	Telephone: <u>432-221-7331</u>
<b><u>OCD Only</u></b>  Received by: _____ Date: _____	

Incident ID	nAB1628728258
District RP	2RP-3937
Facility ID	
Application ID	

## 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>&gt;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 <b>not</b> on an exploration, development, production, or storage site?	<input checked="" type="checkbox"/> Yes <input 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.

State of New Mexico  
Oil Conservation Division

Page 4

Incident ID	nAB1628728258
District RP	2RP-3937
Facility ID	
Application ID	

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: Garrett Green Title: SSHE CoordinatorSignature:  Date: 6/28/2023email: garrett.green@exxonmobil.com Telephone: (575)-200-0729**OCD Only**Received by: Shelly Wells Date: 6/29/2023

Form C-141

State of New Mexico  
Oil Conservation Division

Page 5

Incident ID	nAB1628728258
District RP	2RP-3937
Facility ID	
Application ID	

## 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.

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



June 28, 2023

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

**Re: Remediation Work Plan  
Poker Lake Unit CVX JV RR 006H  
Incident Number nAB1628728258  
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 October 25, 2019. This *Work Plan* proposes to complete additional depth to groundwater determination activities at the Poker Lake Unit CVX JV RR 006H (Site) in response to the New Mexico Oil Conservation Division (NMOCD) denial of the October 25, 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 D, Section 21, Township 25 South, Range 30 East, in Eddy County, New Mexico (32.122643°, -103.893491°) and is associated with oil and gas exploration and production operations on Federal land managed by the Bureau of Land Management (BLM).

On October 10, 2016, a connection failed on the wellhead, causing approximately 13 barrels (bbls) of crude oil and 25 bbls of produced water to release onto the surface of the well pad and mist into the pasture area west of the pad. A vacuum truck recovered approximately 25 bbls of freestanding fluid and a response crew was dispatched to the Site to conduct an initial scrape of the impacted soil. The failed connection was replaced, and the well was put back online. The former operator reported the release to the NMOCD on a Release Notification and Corrective Action Form C-141 (Form C-141) on October 12, 2016. The release was assigned Remediation Permit (RP) Number 2RP-3937 and Incident Number nAB1628728258.

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.

XTO Energy, Inc  
Remediation Work Plan  
Poker Lake Unit CVX JV RR 006H

## BACKGROUND

The October 25, 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.

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 March 2018 and July 2019, delineation and excavation activities were conducted at the Site to address the impacted soil resulting from the October 10, 2016, crude oil and produced water release. Closure was requested on October 25, 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 October 25, 2019, *Closure Request*.

On March 22, 2023, NMOCD denied the *Closure Request* for Incident Number nAB1628728258 for the 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.*

## PROPOSED REMEDIATION WORKPLAN

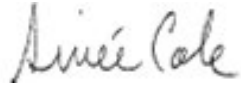
In order to confirm depth to groundwater is greater than 100 feet bgs at the Site, XTO proposes to advance a soil boring to a depth of 105 feet bgs within 0.5 miles of the Site. A field geologist will log and describe soils continuously. The soil boring will be left open for over 72 hours to allow for 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 nAB1628728258.

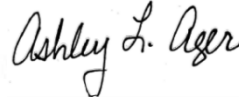
XTO Energy, Inc  
Remediation Work Plan  
Poker Lake Unit CVX JV RR 006H

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

Sincerely,  
**Ensolum, LLC**



Aimee Cole  
Senior Managing Scientist



Ashley Ager, P.G.  
Program Director

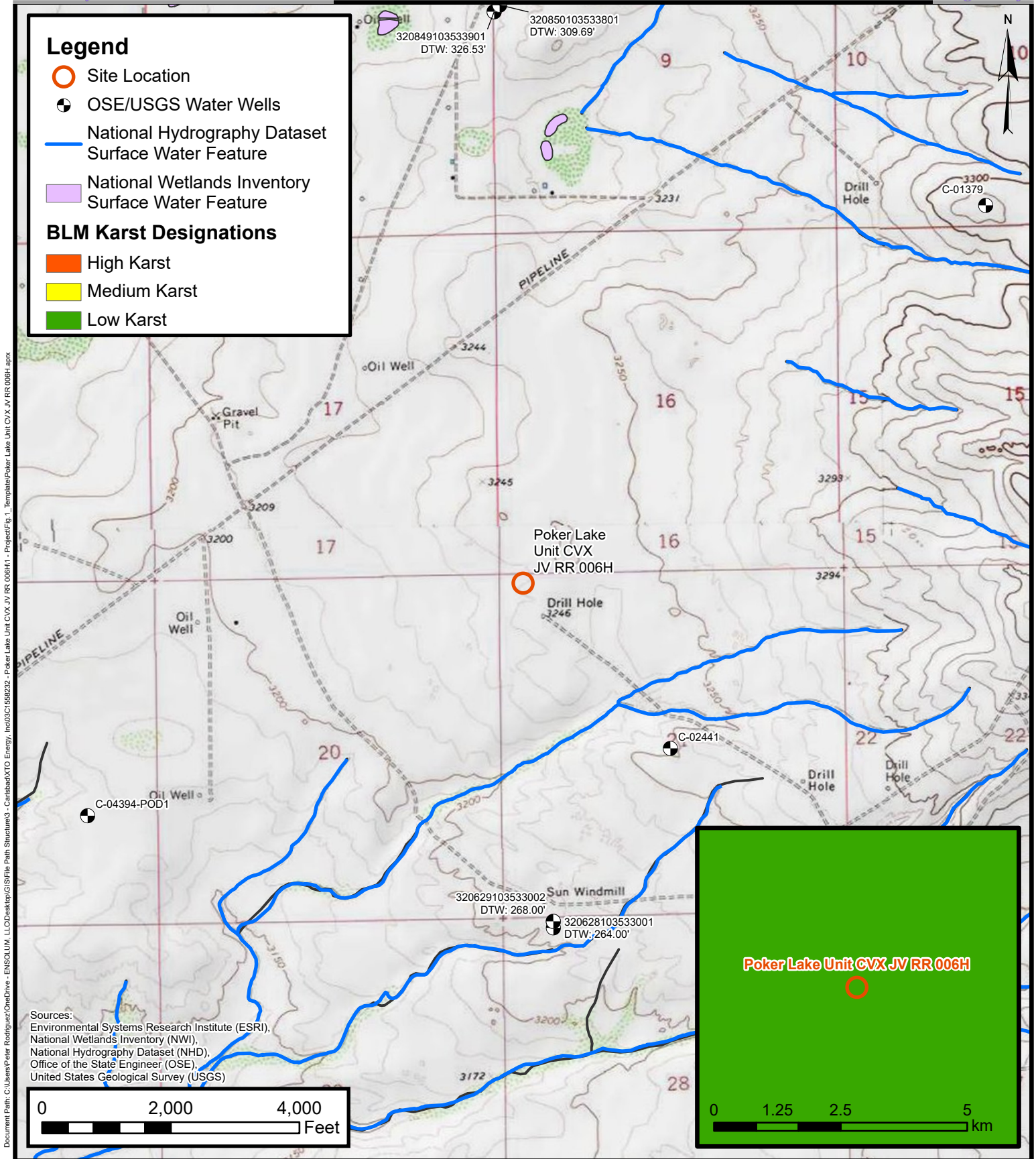
cc: Garrett Green, XTO  
Shelby Pennington, XTO  
Bureau of Land Management

Appendices:

Figure 1 Site Receptor Map



FIGURES



## Site Receptor Map

XTO Energy, Inc  
 Poker Lake Unit CVX JV RR 006H  
 Incident Number: NAB1628728258  
 Unit D, Section 21, 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 234350

CONDITIONS

Operator:  XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID:  5380
	Action Number:  234350
	Action Type:  [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
amaxwell	Work plan to drill a test well for depth to groundwater determination approved.	6/30/2023