Bratcher, Mike, EMNRD

From:	Bratc
Sent:	Tuesc
To:	'Jerus
Subject:	RE: U

ratcher, Mike, EMNRD uesday, February 05, 2013 4:03 PM erusha Rawlings' E: Unresolved well compliance/spill data

Jerusha,

As we discussed, I believe the 2006 releases attributed to the Candelario #1 actually occurred at the battery for this SWD. The battery is located on the South Culebra Bluff #6 well site. While I was unable to locate any documentation that would allow me to close it out, I do not believe these releases should be of concern.

The South Culebra Bluff #4, I was able to locate documentation that will allow for this incident to be closed out.

The status of the remaining incidents is pretty much unknown. I was unable to locate any documentation that would allow for closure of any of them. The 1999 entry for the South Culebra Bluff 23 #11, I believe is a non-incident.

Hope this helps some.

Mike Bratcher NMOCD District 2 811 S. First Street Artesia, NM 88210 O: 575-748-1283 X108 C: 575-626-0857 F: 575-748-9720

From: Jerusha Rawlings [mailto:jrawlings@glenvironmental.com] Sent: Monday, January 28, 2013 2:58 PM To: Bratcher, Mike, EMNRD Subject: Unresolved well compliance/spill data

Mike,

Thanks for taking the time to look at these. The incidents I have questions about are listed below with the wells' API numbers.

Candelario #001 (30-015-26536)

• 10/6/2006 – a release of oil (all recovered) due to human error. No groundwater was affected, but no closure information was available from OCD online.

• 10/10/2006 – a release of oil (15 bbl unrecovered) due to human error. No groundwater was affected, but no closure information was available from OCD online.

South Culebra Bluff #004 (30-015-22931)

• 3/7/2009 – a release of produced water (10 bbl unrecovered) due to a fatigued check valve on the well head. According to OCD documents, immediate action was taken, including sampling and analysis of produced water. OCD requested a work plan for further delineation of all constituents of concern. No other information is available and the disposition of the affected area in unknown.

South Culebra Bluff #006 (30-015-23339)

• 7/15/2005 – a release of oil and produced water (20 bbl unrecovered) due to a "water dump valve malfunction on the heater treater dumping water to oil tank." The produced water and oil was contained inside the fenced berm area and recovered by a vacuum truck. The remaining fluids were spread with sand to soak up the oil, but it is not clear whether the sand was disposed of or left in place. During an inspection, it was noted that the north side of the tank battery was covered with fresh soil to an average depth of approximately 6 inches, but contaminated soils remain below the clean soils. A soil sample was taken, but the disposition of the case is unknown.

South Culebra Bluff #003 (30-015-22700)

• 1/25/2011 – a release of produced fluids (40 bbl unrecovered, water/oil proportion unspecified) due to failure of a tank union. According to form C-141, the area affected was inside the firewalls of the tank battery. The disposition of the affected soil is unknown.

South Culebra Bluff 23 #011 (30-015-26346)

• 7/21/1999 – Other than its listing under the "Complaints, Incidents and Spills" section of OCD's well information page, no other information was available.

• 8/21/2006 – a release of oil (5 bbl unrecovered) due to failure of a valve on the pump jack. According to form C-141, a vacuum truck was called immediately and recovered 10 bbl. Approximately 5 bbl soaked into ground. The disposition of this soil is unknown.

Regards,

Jerusha Rawlings, PhD



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