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

accordance with 19.15.29 NMAC.

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

Submit 1 Copy to appropriate District Office in

Form C-141

Revised August 8, 2011

Release Notification and Corrective Action OPERATOR Initial Report Final Report Name of Company Devon Energy Production Company **Contact** Wesley Ryan, Production Foreman **Telephone No.** 575-390-5436 Address 6488 Seven Rivers Hwy Artesia, NM 88210 Facility Name Tresnor Mitchell 30 Federal 2 Facility Type Oil Surface Owner Federal Mineral Owner Federal **API No** 30-025-32754 LOCATION OF RELEASE Unit Letter Feet from the North/South Line Feet from the East/West Line Section Township Range County F 30 23S 32E 2310 North 2310 West Lea **Latitude:** N 32.2763062 **Longitude:** W -103.7154846 NATURE OF RELEASE Type of Release Produced water (PW) & Oil Volume of Release 9 BBLS PW Volume Recovered 7.50 BBLS PW & & 1 BBL Oil 0.50 BBL Oil **Date and Hour of Occurrence Date and Hour of Discovery** Source of Release 3/5/2017 @ 8:57am Poly transition line 3/5/2017 @ 8:57am Was Immediate Notice Given? If YES, To Whom? **BLM-Shelly Tucker** OCD-Olivia Yu By Whom? Wesley Ryan, Production Foreman **Date and Hour BLM-**3/6/2017 @ 7:30am OCD-3/6/2017 @ 7:45am If YES, Volume Impacting the Watercourse Was a Watercourse Reached? ☐ Yes ⊠ No RECEIVED If a Watercourse was Impacted, Describe Fully.* By Olivia Yu at 8:27 am, Mar 15, 2017 Describe Cause of Problem and Remedial Action Taken.* A 2 inch poly transition line became clogged with paraffin the blockage caused the line to pressure up resulting in the 2 inch poly transition line splitting. The split in the 2 inch poly transition line caused a release of 9 BBLS of produced water and 1 BBL of oil. The well was shut down to prevent further release. The damaged portion of the 2 inch poly transition line was replaced. Describe Area Affected and Cleanup Action Taken.* Approximately 9 BBLS of produced water and 1 BBL of oil was released from a 2 inch poly transition line that split due to high line pressure caused by paraffin blockage. The released 9 BBLS of produced water and 1 BBL of oil flowed in an Easterly direction away from the well. The approximate size of the release was 50 feet wide by 20 feet in length. A vacuum truck was dispatched and recovered 7.50 BBLS of produced water and a 0.50 BBL of oil. A remediation contractor will be contacted to complete 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 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. OIL CONSERVATION DIVISION Signature: Sarah Gallegos-Troublefield Printed Name: Sarah Gallegos-Troublefield Approved by Environmental Specialist: 3/15/2017 Approval Date Title: Field Admin Support **Expiration Date:** E-mail Address: Sarah.Gallegos-Troublefield@dvn.com Conditions of Approval: Attached \(\sqrt{1}\) see attached directive

Phone: 575.748.1864

Date: 3/8/2017

Operator/Responsible Party,

The OCD has received the form C-141 you provided on _3/13/2017_ regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number __1R-_4644__ 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 <u>division-approved corrective action</u> 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 _1_ office in __Hobbs____ on or before _4/15/2017__. 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

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