

From: [Yu, Olivia, EMNRD](#)
To: [Davis, Brandon](#); stucker@blm.gov
Cc: [Hernandez, Christina, EMNRD](#)
Subject: RE: Wilder Federal 28-1
Date: Tuesday, October 16, 2018 1:59:00 PM
Attachments: 1RP5238_Wilder 28-1.pdf

Mr. Davis:

Notes

- Please remember to include Christina Hernandez, the other Environmental Specialist in District 1, in all communications and report submittals.
- Unless misheard on the voicemail, the initial notification of the release was for a release volume of 81 bbls of produced water. Was this assessment based on visual estimation?

Thank you for providing the photos of the spill area and calculations to determine the release volume. Please have Conoco Phillips's Environmental Department provide the rationale for setting the proportion of soil absorption at 0.25 and soil porosity at 0.25.

In an idealized soil, 50% is pore space and 50% is solid material. Of the 50% pore space, approximately 25% is filled with air and 25% with water. The 0.25 could be interpreted as free available pore space (soil porosity %) for spill fluids to fill and the other 0.25 as not available since these spaces are filled with porewater. With the soil porosity set at 0.25, an assumption could be made that 100% of the 0.25 porosity was filled with the produced water. However, with the soil absorption proportion set at 0.25, the interpretation of the equation is that only 1/4 of the 3-inch depth entered the 0.25 pore space. Is there an misunderstanding or misuse of the term 'soil absorption'?

Please be advised that

1. Per 19.15.29.13 NMAC, regulations of corresponding agencies supersede NMOCD's.
2. Dated, geo-referenced photo documentation for verification that the initial response activities have been employed to contain the release is requested.

The 1RP for this incident is

5238	10/16/2018	A	Conoco Phillips	Wilder Federal CTB	30-025-40261	26S-32E-28A	10/10/2018
-------------	------------	---	-----------------	--------------------	--------------	-------------	------------

Please remember to include this 1RP identifier to all communications. Delineate and remediate per regulation. Mind the timelines for submittal of requisite information.

Please be advised that NMOCD recommends a completed site characterization/delineation report be reviewed or approved by NMOCD BEFORE any significant remediation work towards closure.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
Olivia.yu@state.nm.us
575-393-6161 x113

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Davis, Brandon <Brandon.Davis@conocophillips.com>
Sent: Friday, October 12, 2018 9:22 AM
To: stucker@blm.gov; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: [EXT] Wilder Federal 28-1

All,

Attached is the C-141 for the illegal dumping that was discovered on a ConocoPhillips well pad on 10/10/2018. This is the initial notification and attached is a document containing pictures as well as the spill calculator.

Please let me know if there is anything additional needed for the initial notification.

Thank you,

Brandon Davis
HSE Specialist
281.687.2852 - Cell
Brandon.Davis@ConocoPhillips.com