

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	
District RP	
Facility ID	
Application ID	

### Release Notification

#### Responsible Party

Responsible Party: Transwestern Pipeline Company	OGRID: 329750
Contact Name: Kerry Egan	Contact Telephone: 575-808-9402
Contact email: Kerry.Egan@energytransfer.com	Incident # (assigned by OCD) NRM2029643364
Contact mailing address 6381 N. Main St, Roswell, NM 88201	

#### Location of Release Source

Latitude 32.529975° Longitude -103.809317°  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: WT-1 Compressor Station	Site Type: Pipeline Compressor Station
Date Release Discovered: 10/18/2020	API# (if applicable)

Unit Letter	Section	Township	Range	County
	31	20S	32E	Lea

Surface Owner:  State  Federal  Tribal  Private (Name: Transwestern Pipeline Company)

#### 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 type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	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 checked="" type="checkbox"/> Natural Gas	Volume Released (Mcf) 7,894	Volume Recovered (Mcf) N/A
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release:  
  
Malfunction of an aboveground relief valve resulted in the release of 7,894 Mscf of pipeline quality natural gas. No effect on soil, ground water or surface water has been observed.

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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?  The total volume of released gas was >500 Mscf. According to NMAC 19.15.29.7(A)(3), this constitutes a major release.
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If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?  
 Initial attempts to provide immediate verbal notification were made by Kerry Egan (Transwestern Pipeline) on 10/19/2020 between 2:25PM and 2:40PM.  
 Phone calls were made to publicly posted phone numbers to the District 1 office, Mike Bratcher of District 2, Robert Hamlet of District 2, and Jim Griswold of the Santa Fe office. No response was received from any of the named individuals. Voicemail messages were left with the initial notification information. An email was sent to Jim Griswold on 10/19/20 with the initial notification.

### Initial Response


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

- The source of the release has been stopped.
- The impacted area has been secured to protect human health and the environment.
- Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.
- All free liquids and recoverable materials have been removed and managed appropriately.

If all the actions described above have not been undertaken, explain why:  
  
 The gas was pipeline quality (>98% methane), and contains no liquids. No material made it onto the soil surface. No remediation is required/possible.

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: Kerry Egan Title: Environmental Specialist  
 Signature:  Date: 10/22/2020  
 email: Kerry.Egan@energytransfer.com Telephone: 575-808-9402

**OCD Only**  
 Received by: \_\_\_\_\_ Date: \_\_\_\_\_

State of New Mexico  
Oil Conservation Division

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Site Assessment Characterization

1	Yes	<input type="checkbox"/>
2	Yes	<input type="checkbox"/>
3	Yes	<input type="checkbox"/>
4	Yes	<input type="checkbox"/>
5	Yes	<input type="checkbox"/>
6	Yes	<input type="checkbox"/>
7	Yes	<input type="checkbox"/>
8	Yes	<input type="checkbox"/>
9	Yes	<input type="checkbox"/>
10	Yes	<input type="checkbox"/>
11	Yes	<input type="checkbox"/>
12	Yes	<input type="checkbox"/>
13	Yes	<input type="checkbox"/>
14	Yes	<input type="checkbox"/>
15	Yes	<input type="checkbox"/>
16	Yes	<input type="checkbox"/>
17	Yes	<input type="checkbox"/>
18	Yes	<input type="checkbox"/>
19	Yes	<input type="checkbox"/>
20	Yes	<input type="checkbox"/>

21. A detailed description of the site and the nature of the spill should be provided. This information should be included in the report.

22	Yes	<input type="checkbox"/>
23	Yes	<input type="checkbox"/>
24	Yes	<input type="checkbox"/>
25	Yes	<input type="checkbox"/>
26	Yes	<input type="checkbox"/>
27	Yes	<input type="checkbox"/>
28	Yes	<input type="checkbox"/>
29	Yes	<input type="checkbox"/>
30	Yes	<input type="checkbox"/>
31	Yes	<input type="checkbox"/>
32	Yes	<input type="checkbox"/>
33	Yes	<input type="checkbox"/>
34	Yes	<input type="checkbox"/>
35	Yes	<input type="checkbox"/>
36	Yes	<input type="checkbox"/>
37	Yes	<input type="checkbox"/>
38	Yes	<input type="checkbox"/>
39	Yes	<input type="checkbox"/>
40	Yes	<input type="checkbox"/>
41	Yes	<input type="checkbox"/>
42	Yes	<input type="checkbox"/>
43	Yes	<input type="checkbox"/>
44	Yes	<input type="checkbox"/>
45	Yes	<input type="checkbox"/>
46	Yes	<input type="checkbox"/>
47	Yes	<input type="checkbox"/>
48	Yes	<input type="checkbox"/>
49	Yes	<input type="checkbox"/>
50	Yes	<input type="checkbox"/>

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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?	_____ N/A (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 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 1/2-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.



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Oil Conservation Division

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Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

email: \_\_\_\_\_ Telephone: \_\_\_\_\_

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

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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: \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

email: \_\_\_\_\_ Telephone: \_\_\_\_\_

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

- Approved     
 Approved with Attached Conditions of Approval     
 Denied     
 Deferral Approved

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

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### Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

**Closure Report Attachment Checklist:** *Each of the following items must be included in the closure report.*

- A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- Description of 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 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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Kerry Egan Title: Environmental Specialist  
 Signature:  Date: 10/22/2020  
 email: Kerry.Egan@energytransfer.com Telephone: 575-808-9402

**OCD Only**

Received by: Chad Hensley Date: 04/21/2021

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by:  Date: 04/21/2021  
 Printed Name: Chad Hensley Title: Environmental Specialist Advanced

**Egan, Kerry L**

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**From:** OCDOOnline@state.nm.us  
**Sent:** Thursday, October 22, 2020 12:23 PM  
**To:** Egan, Kerry L  
**Subject:** New Mexico OCD Application Submission was Rejected by the OCD

The Oil Conservation Division (OCD) has rejected the application PO: 66HSC-201020-C-1410. The original application was submitted by Kerry Egan for Transwestern Pipeline Company, LLC.

The user added the additional comment:

"To whom it may concern, The OCD has not accepted the submitted Initial C-141 Application which has been assigned **NRM2029643364** incident number. Please retain this incident number as it is required for all future communication and submittals. The submitted Initial C-141 is not accepted for the following reason(s): The lateral and longitudinal information does not match the ULSTR regarding the release location. Please resubmit the C-141 form with corrected information, reference the incident tracking number, upload the document and fee, through the application portal. When submitting future reports regarding this release, please submit the calculations used or specific justification for the volumes reported on the initial C-141. Thank you. Ramona Marcus, Compliance Officer NMOCD 505-470-3044 Ramona.Marcus@state.nm.us".

If you are concerned about receiving this email or have any other questions, please feel free to contact our Santa Fe OCD office.

**New Mexico Energy, Minerals and Natural Resources Department**  
1220 South St. Francis Drive  
Santa Fe, NM 87505



**Egan, Kerry L**

**From:** Egan, Kerry L  
**Sent:** Friday, October 23, 2020 7:54 AM  
**To:** Egan, Kerry L  
**Subject:** FW: Gas loss

Calculation Methodology for release volume.

Garret relief equation and averaged the flow at 932 and 988 for 11 minutes to come up with 7894 MCF



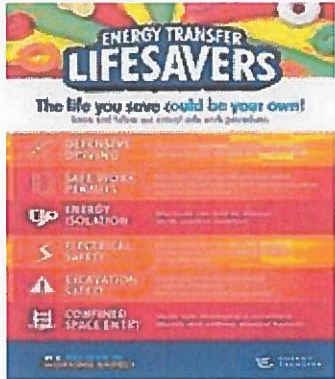
**Kerry Egan**  
Environmental Specialist  
Energy Transfer Company  
**Office:** 575-347-6512  
**Cell:** 575-808-9402  
8501 Jefferson NE  
Albuquerque, NM 87113

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**From:** Arnold, Cody <Cody.Arnold@energytransfer.com>  
**Sent:** Monday, October 19, 2020 11:46 AM  
**To:** Harryman, Kathryn <Kathryn.Harryman@energytransfer.com>; Egan, Kerry L <kerry.egan@energytransfer.com>  
**Subject:** FW: Gas loss

Better figure on gas loss. See below

Thanks,



*Cody Arnold*  
Sr Manager--Operations  
Energy Transfer  
**office:** 575-347-6095  
**cell:** 505-301-4507



Every day is a good day. If you don't think so, try missing one.

**From:** Kunkel, Laura <[Laura.Kunkel@energytransfer.com](mailto:Laura.Kunkel@energytransfer.com)>  
**Sent:** Monday, October 19, 2020 7:38 AM  
**To:** Arnold, Cody <[Cody.Arnold@energytransfer.com](mailto:Cody.Arnold@energytransfer.com)>  
**Subject:** RE: Gas loss

I used the Garret relief equation and averaged the flow at 932 and 988 for 11 minutes to come up with 7894 MCF. (The flow rate is not really a straight line, but that's the quick way to do it.)

The area of orifice in the Garrett is 38.48 square inches.

**From:** Arnold, Cody <[Cody.Arnold@energytransfer.com](mailto:Cody.Arnold@energytransfer.com)>  
**Sent:** Monday, October 19, 2020 6:24 AM  
**To:** Kunkel, Laura <[Laura.Kunkel@energytransfer.com](mailto:Laura.Kunkel@energytransfer.com)>  
**Subject:** Gas loss

Can you figure gas loss for me? Starting pressure 988, ending 932. Blew 11 minutes through an 8x8 garrett relief. Gas temp 130

**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 10817

**CONDITIONS OF APPROVAL**

Operator: TRANSWESTERN PIPELINE COMPANY,	6381 North Main St.	Roswell, NM88201	OGRID: 329750	Action Number: 10817	Action Type: C-141
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OCD Reviewer	Condition
chensley	None