

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 Philana Thompson	OGRID 247130
Contact Name Philana Thompson	Contact Telephone 5054861171
Contact email pthompson@merrion.bz	Incident # (assigned by OCD)
Contact mailing address 610 Reilly Ave Farmington, NM 87401	

Location of Release Source

Latitude 36.7579498 _____ Longitude -108.0734253 _____
(NAD 83 in decimal degrees to 5 decimal places)

Site Name Sunco Disposal #1	Site Type Surface Waste Facility (NM1-9)
Date Release Discovered: Unknown, prior to 2/20/2012	API# (if applicable) 30-045-28653

Unit Letter	Section	Township	Range	County
E	2	29N	12W	San Juan

Surface Owner: ☐ State ☐ Federal ☐ Tribal ☒ Private (Name: Agua Moss, LLC _____)

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 type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input checked="" type="checkbox"/> Other (describe)	Volume/Weight Released (provide units) Unknown	Volume/Weight Recovered (provide units) Unknown

Cause of Release

Permitted Surface Waste Management Facility under NM-01-0009 Approved for use 1/27/1997 for Sunco Trucking Water Disposal Company. The nature and extent of what was placed in the landfarm is unknown, however, per permit conditions it was related to activities that took place for the Sunco Disposal #1 UICI-5 operations and no other outside waste was placed in the landfarm. Agua Moss, LLC has not utilized the landfarm since taking over operations 2/20/2012.

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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?	83 (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 not 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.

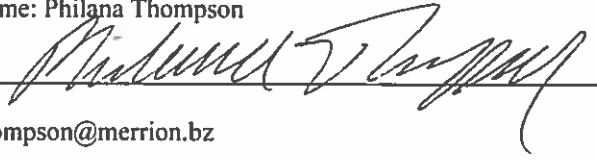
State of New Mexico
Oil Conservation Division

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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: Philana Thompson

Title: HSE & Regulatory Compliance

Signature: 

Date: 9/8/2020

email: pthompson@merrion.bz

Telephone: 505-486-1171

OCD Only

Received by: _____

Date: _____

Site Characterization/Assessment information previously
submitted and accepted by NMOCD on 4/20/2022.

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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.

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: Philana Thompson Title: HSE & Regulatory Compliance

Signature:  Date: 7/21/2022

email: pthompson@merrion.bz Telephone: 505-486-1171

OCD Only

Received by: _____ Date: _____

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

- see text box below

Signature: Nelson Velez Date: 08/17/2022

The future use of the landfarm areas will require approval from the OCD Permitting Group that oversees this surface waste facility.

Remediation Plan - Sunco Disposal #1 Vadose Zone

Proposed remediation of soils exceeding 19.15.29.13D (1) reclamation standards for chloride (600 milligrams per kilograms or mg/Kg) within the vadose zone of two (2) identified areas listed below (also see included Site Map).

Sample ID	Chloride Concentrations	GPS Coordinates
Cell #1 Vadose Cell 1-2	870 mg/kg	36.758376, -108.071689
Cell #2 North Vadose Cell 2N-3	1,000 mg/kg	36.759069, -108.072243

1. A backhoe will be utilized to advance the two (2) excavation areas.
2. Each excavation dimension will be approximately 10 ft. x 10 ft. x 4 ft. deep or approximately 15 cubic yards. The excavation centers will be the corresponding GPS coordinates listed above.
3. Prior to the excavation advancements, treatment zone soils will be scraped approximately 4 to 6 inches below grade where the temporary stockpiles will be positioned to minimize the potential of cross contamination.
4. The excavated soils will be temporarily stockpiled near the excavation, thoroughly mixed, then sampled.
5. A grab sample from each wall, a five (5) point composite sample from the bottom of both test pits and a five (5) point composite sample will be collected from each of the two (2) stockpiles and analyzed for chloride using USEPA Method 300.0. Soil samples will be placed into 4 laboratory supplied glassware, labeled, and maintained on ice until delivery to Hall Environmental Analysis Laboratory in Albuquerque, New Mexico.
6. If the laboratory results are equal to or less than the reclamation standards for chloride, then the stockpile(s) will be reintroduced to its/their original location.
7. If the laboratory results are greater than the reclamation standards for chloride, then the stockpile(s) will be remediated by applying an applicable quantity of gypsum, mixed thoroughly once again, then re-sampled. This step will be repeated, if necessary, until the reclamation standard is met. Thereafter, the stockpile(s) will then be reintroduced to its/their original location.
8. Treatment zone soils will then be place back to their original areas.
9. The excavation will commence within two (2) weeks upon receiving OCD approval of the remediation plan.
10. The final closure report will be submitted within 90 days of OCD approval date.

The future use of the landfarm areas is planned for the construction of a parking lot and equipment storage yard that will have a compacted gravel surface. Re-vegetation will not be used as site stabilization.

Legend

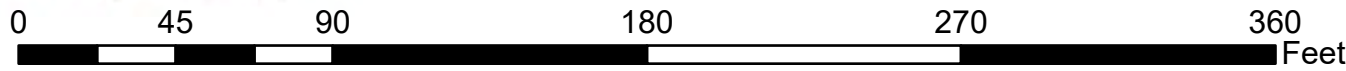
- Cell #1
- Cell #2 - North
- Cell #2 - South

Cell #2 North Vadose Cell 2N-3

Cell #1 Vadose Cell 1-2

Source: Google Earth Imagery (3/15/2015)

Rule Engineering, LLC
Solutions to Regulations for Industry



NW1/4-S02-T29N-R12W
San Juan County, NM

Figure 1
Sample Location Map
Agua Moss
Surface Waste Management Facility

Document Path: R:\27 GIS CAD\Marion\Marion Land Farm\Marion Landfarm.aprx

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
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1000 Rio Brazos Rd., Aztec, NM 87410
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Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
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Santa Fe, NM 87505

CONDITIONS

Action 130886

CONDITIONS

Operator: AGUA MOSS, LLC P.O. Box 600 Farmington, NM 87499	OGRID: 247130
	Action Number: 130886
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
nvelez	The future use of the landfarm areas will require approval from the OCD Permitting Group that oversees this surface waste facility.	8/17/2022