

**Line Leak Calc**

Orifice Diameter	0.123 inches
Pressure	50 psig
Time/date Discovered	3/4/2024 16:31
Time/date Isolated	3/4/2024 17:30
Total Hours Blown	0.98 hours
Area of Orifice	0.012 sq. inches

**Lost Gas From Line Leak                      0.74 Mcf**

**Blowdown Calc**

Length	2,405 feet
Actual Pipe OD	4.500 inches
Wall Thickness	0.188 inches
Pressure	50 psig

**Lost Gas From Blowdown                      0.76 Mcf**

<b>Total Gas Loss</b>	<b>1.50 Mcf</b>
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Notes:

Lost Gas=(Orifice Diameter)<sup>2</sup>\*Pressure\*Time Blown

Lost Gas=(Inside Diameter)<sup>2</sup>\*Pressure\*Length\*0.372/1000000

To Whom it May Concern,

Harvest is resubmitting this initial C-141 for Incident nAPP2406531926 to ensure they are meeting the requirements of NMAC 19.15.29.10A (2). It has been Harvest's understanding that if a gas only release occurs in a wash 19.15.29.7A (2b) NMAC would apply and therefore a C141 was originally submitted for this release on March 12, 2024. The NMOCD rejected the C141 on March 12, 2024, because it is a gas only release and requested it be submitted under a C-129. Harvest submitted a C-129 and a request to cancel the C141 on March 13, 2024. The NMOCD approved the request to cancel the C141 on March 14, 2024, and approved the C-129 on March 15, 2024. In a separate correspondence with the NMOCD not related to this release, it was clarified that a C-141 should be submitted for a gas only release in a wash per 19.15.29.7A (2b) NMAC. All referenced correspondence are included below. This C141 is being resubmitted as a precaution, as Harvest wants to ensure they meet the 15-day notification requirement if it is in fact required for this release. Could the OCD please provide feedback on how to proceed for this release and future releases of this nature.

**From:** [OCDOnline@state.nm.us](mailto:OCDOnline@state.nm.us) <[OCDOnline@state.nm.us](mailto:OCDOnline@state.nm.us)>

**Sent:** Tuesday, March 12, 2024 2:33 PM

**To:** Chad Snell - (C) <[chad.snell@harvestmidstream.com](mailto:chad.snell@harvestmidstream.com)>

**Subject:** [EXTERNAL] The Oil Conservation Division (OCD) has rejected the application, Application ID: 322535

**CAUTION:** External sender. DO NOT open links or attachments from UNKNOWN senders.

To whom it may concern (c/o Chad Snell for Harvest Four Corners, LLC),

The OCD has rejected the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nAPP2406531926, for the following reasons:

- **Rejecting initial C-141. Gas release only. C-129 needs to be submitted to epermitting instead of C-141.**

The rejected C-141 can be found in the OCD Online: Permitting - Action Status, under the Application ID: 322535.

Please review and make the required correction(s) prior to resubmitting.

If you have any questions why this application was rejected or believe it was rejected in error, please contact me prior to submitting an additional C-141.

Thank you,

Shelly Wells

Environmental Specialist-A

505-469-7520

[Shelly.Wells@emnrd.nm.gov](mailto:Shelly.Wells@emnrd.nm.gov)

**New Mexico Energy, Minerals and Natural Resources Department**

1220 South St. Francis Drive

Santa Fe, NM 87505

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**From:** [OCDOnline@state.nm.us](mailto:OCDOnline@state.nm.us) <[OCDOnline@state.nm.us](mailto:OCDOnline@state.nm.us)>  
**Sent:** Thursday, March 14, 2024 9:32 AM  
**To:** Chad Snell - (C) <[chad.snell@harvestmidstream.com](mailto:chad.snell@harvestmidstream.com)>  
**Subject:** [EXTERNAL] The Oil Conservation Division (OCD) has approved the application, Application ID: 322890

**CAUTION:** External sender. DO NOT open links or attachments from UNKNOWN senders.

To whom it may concern (c/o Chad Snell for Harvest Four Corners, LLC),

The OCD has approved the submitted *Request to Cancel the Notification of a Release (C-141C)*, for incident ID (n#) nAPP2406531926, with the following conditions:

- **Gas release only. No liquids to soil surface.**

If you have any questions regarding this application, please contact me.

Thank you,  
Shelly Wells  
Environmental Specialist-A  
505-469-7520  
[Shelly.Wells@emnrd.nm.gov](mailto:Shelly.Wells@emnrd.nm.gov)

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**From:** [OCDOnline@state.nm.us](mailto:OCDOnline@state.nm.us) <[OCDOnline@state.nm.us](mailto:OCDOnline@state.nm.us)>

**Sent:** Friday, March 15, 2024 10:54 AM

**To:** Chad Snell - (C) <[chad.snell@harvestmidstream.com](mailto:chad.snell@harvestmidstream.com)>

**Subject:** [EXTERNAL] The Oil Conservation Division (OCD) has accepted the application, Application ID: 323642

**CAUTION:** External sender. DO NOT open links or attachments from UNKNOWN senders.

To whom it may concern (c/o Chad Snell for Harvest Four Corners, LLC),

The OCD has accepted the submitted *Venting and/or Flaring of Natural Gas Caused by an Emergency, a Malfunction or of Long Duration Report (C-129)*, for incident ID (n#) nAPP2407539241, with the following conditions:

- **If the information provided in this report requires an amendment, submit a [C-129] Amend Venting and/or Flaring Incident (C-129A), utilizing your incident number from this event.**

Please reference nAPP2407539241, on all subsequent C-129 submissions and communications regarding any amendments for this report.

If you have any questions regarding this application, or don't know why you have received this email, please contact us.

[ocd.enviro@state.nm.us](mailto:ocd.enviro@state.nm.us)

## **New Mexico Energy, Minerals and Natural Resources Department**

1220 South St. Francis Drive  
Santa Fe, NM 87505

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## OCD Permitting

Home > Operator Data > Action Status > Action Search Results > Action Status Item Details

### [C-129] Venting and/or Flaring (C-129) Application

#### Submission Information

Submission ID:	323642	Districts:	Aztec
Operator:	<a href="#">[373888]</a> Harvest Four Corners, LLC	Counties:	San Juan
Description:	Harvest Four Corners, LLC [373888] , nAPP2407539241		
Status:	APPROVED		
Status Date:	03/15/2024		
References (2):	fAPP2123052765, nAPP2407539241		

#### Forms

**From:** Velez, Nelson, EMNRD <Nelson.Velez@emnrd.nm.gov>  
**Sent:** Tuesday, March 19, 2024 1:17 PM  
**To:** Brooke Herb <bherb@ensolum.com>  
**Subject:** Re: [EXTERNAL] Gas Only Releases

[\*\*EXTERNAL EMAIL\*\*]

Good afternoon Brooke,

Thanks for the correspondence. The following is the affirmation of your inquiries;

- If an operator has a gas only release from a below ground pipeline, they should fill out a C-129. **If the calculated volume exceeds 50 mcf per 19.15.29.7B or 19.15.27.8G NMAC. In addition, regardless of volume, reported on monthly Form C-115B per 19.15.27.8G (2b) NMAC.** It should be noted that almost every gathering pipeline has some form of liquids prior to the deliver to a natural gas plant as field separation and dehydration are not 100% effective. Liquids are also reduced if the Operator has a routine pigging operation for the pipeline. Based on the above 100% dry pipeline release are the not the norm.
  - If a C-129 is submitted and the volume of the release ends up being under 50 mcf, the operator can cancel the C-129 themselves. **YES, but the gas loss should be included in the monthly C-115B submission per 19.15.27.8G (2b) NMAC regardless of volume.**
- If the release is from a pipeline that is under a wash with running/ standing water they should report immediately using a C-141 **YES, per 19.15.29.7A (2b) and 19.15.27.8G (1d) NMAC**, but if it is in an intermittent wash that is dry, they still would use a C-129. **No per 19.15.29.7A (2b) & 19.15.27.8G (1a) & (1d) NMAC**
  - So, if a gas only release is in a dry wash (defined per 19.15.2.7W (4) NMAC) and is less than 50 mcf, then no reporting is required? **No, per 19.15.29.7A (2b) NMAC. In addition, regardless of volume, reported on monthly Form C-115B submission per 19.15.27.8G (2b) NMAC.** This situation is extremely unlikely that the gathering line didn't contain ANY liquids, or that the release was less than 8+ hours as most underground pipeline releases are only discovered after they have reached the surface due to a prolong occurrence &/or high pressure.
- If when they excavate to fix the pipeline there is any evidence of liquids released (Staining, moisture, etc.), even if it is only one gallon, they need to report the release on a C-141.
  - In this scenario is the C-129 cancelled? **YES (guidance document attached).**

If you have any further questions or concerns, please contact me at your convenience.

Have a safe and productive day!

Regards,

**Nelson Velez** • Environmental Specialist - Adv

Environmental Bureau | EMNRD - Oil Conservation Division

1000 Rio Brazos Road | Aztec, NM 87410

(505) 469-6146 | [nelson.velez@emnrd.nm.gov](mailto:nelson.velez@emnrd.nm.gov)

<http://www.emnrd.state.nm.us/OCD/>





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**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

QUESTIONS

Action 324886

**QUESTIONS**

Operator: Harvest Four Corners, LLC 1755 Arroyo Dr Bloomfield, NM 87413	OGRID: 373888
	Action Number: 324886
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

**QUESTIONS**

<b>Prerequisites</b>	
Incident ID (n#)	nAPP2406531926
Incident Name	NAPP2406531926 REID 8 @ 0
Incident Type	Natural Gas Release
Incident Status	Cancellation Request Approved

**Location of Release Source**

Please answer all the questions in this group.

Site Name	REID 8
Date Release Discovered	03/04/2024
Surface Owner	Federal

**Incident Details**

Please answer all the questions in this group.

Incident Type	Natural Gas Release
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	Yes
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

**Nature and Volume of Release**

Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.

Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Not answered.
Is the concentration of chloride in the produced water >10,000 mg/l	No
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Cause: Corrosion   Pipeline (Any)   Natural Gas Vented   Released: 2 Mcf   Recovered: 0 Mcf   Lost: 2 Mcf.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Natural Gas Only Release in a wash.

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QUESTIONS, Page 2

Action 324886

**QUESTIONS (continued)**

Operator: Harvest Four Corners, LLC 1755 Arroyo Dr Bloomfield, NM 87413	OGRID: 373888
	Action Number: 324886
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

**QUESTIONS**

<b>Nature and Volume of Release (continued)</b>	
Is this a gas only submission (i.e. only significant Mcf values reported)	<b>Yes, according to supplied volumes this appears to be a "gas only" report.</b>
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	<b>Yes</b>
Reasons why this would be considered a submission for a notification of a major release	<b>From paragraph A. "Major release" determine using: (2) an unauthorized release of a volume that: (b) may with reasonable probability reach a watercourse.</b>

*With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.*

**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	<b>True</b>
The impacted area has been secured to protect human health and the environment	<b>True</b>
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	<b>True</b>
All free liquids and recoverable materials have been removed and managed appropriately	<b>True</b>
If all the actions described above have not been undertaken, explain why	<i>Not answered.</i>

*Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.*

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.

I hereby agree and sign off to the above statement	Name: Brooke Herb Title: regulatory analyst Email: bherb@ensolum.com Date: 03/19/2024
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QUESTIONS, Page 3

Action 324886

**QUESTIONS (continued)**

Operator: Harvest Four Corners, LLC 1755 Arroyo Dr Bloomfield, NM 87413	OGRID: 373888
	Action Number: 324886
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

**QUESTIONS**

**Site Characterization**  
 Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). 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 in feet below ground surface (ft bgs)	Not answered.
What method was used to determine the depth to ground water	Not answered.
Did this release impact groundwater or surface water	Not answered.
<b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>	
A continuously flowing watercourse or any other significant watercourse	Not answered.
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Not answered.
An occupied permanent residence, school, hospital, institution, or church	Not answered.
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Not answered.
Any other fresh water well or spring	Not answered.
Incorporated municipal boundaries or a defined municipal fresh water well field	Not answered.
A wetland	Not answered.
A subsurface mine	Not answered.
An (non-karst) unstable area	Not answered.
Categorize the risk of this well / site being in a karst geology	Not answered.
A 100-year floodplain	Not answered.
Did the release impact areas not on an exploration, development, production, or storage site	Not answered.

<b>Remediation Plan</b>	
Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.	
Requesting a remediation plan approval with this submission	No
The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.	

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CONDITIONS

Action 324886

**CONDITIONS**

Operator: Harvest Four Corners, LLC 1755 Arroyo Dr Bloomfield, NM 87413	OGRID: 373888
	Action Number: 324886
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

**CONDITIONS**

Created By	Condition	Condition Date
scwells	None	3/20/2024