



Closure Report/Waste Transportation Standard Operating Procedure (SOP)

Lea Federal Unit #022

API #30-025-39010

Incident #nGRL0824256745

Lea County, Colorado

Unit H, Section 12, Township 20 South, Range 34 East

GPS Coordinates: 32.589497, -103.508415

Prepared For

Avant Natural Resources, LLC

1515 Wynkoop Street

Denver, Colorado 80202

Prepared By

CDH Consulting, LLC

Thornton, Colorado



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Avant Natural Resources, LLC (Avant) has contracted CDH Consulting, LLC (CDH) to complete the necessary steps to obtain closure for the above-referenced incident associated with the Lea Federal Unit #022. On August 28, 2008, the New Mexico Oil Conservation Division (NMOCD) approved the Initial C-141 Release Notification and Corrective Action form with the condition of approval (COA), "Submit final report stating action taken to prevent any future incidents of this nature" with a due date of September 12, 2008.

Samson Resources Company (Samson) was the operator at the time of the incident. In August 2010, Samson sold the production well to Legacy Reserves Operating, LP (Legacy). During Avant's recent acquisition of the production well from Legacy, Avant discovered Incident #nGRL0824256745 was still open. In an attempt to be good stewards of the land, Avant's goal is to close the historic release by presenting waste transportation practices Avant has established to prevent incidents of this nature, as requested by the NMOCD COA.

SITE INFORMATION

On August 27, 2008, a truck hauling drill cuttings from a closed-loop system to the landfarm leaked as it left the Lea Federal Unit #022 location. Upon discovery, all leaked materials were recovered, and the belly dump was sealed on the leaking truck.

On August 27, 2008, the Initial C-141 Release Notification and Corrective Action (Attachment A) was submitted to the NMOCD detailing the initial response to the release. NMOCD approved the Initial C-141, assigned incident #nGRL0824256745 to the release, and attached the COA requiring Samson to present actions taken to prevent future incidents of this nature. On August 15, 2018, an extension was submitted/approved by the NMOCD.

WASTE TRANSPORTATION PRACTICES

Avant utilizes the following outlined procedures to prevent a similar release from occurring:

- Packaging waste for transportation will be designed to reduce the risk of loss, leakage, or exposure during shipment and to communicate information on potential hazards posed by the material in transport.
- Waste shipments will be tracked and correctly packaged and labeled to communicate potential hazards. Specific transport requirements include manifesting, packaging, marking, and labeling waste



packages, placarding transport vehicles, choosing appropriate waste transporters and shipment destinations, recordkeeping, and reporting.

- The transportation of hazardous materials is regulated (49 CFR Part 172) by the Department of Transportation (DOT). Hazardous waste manifests serve as DOT shipping papers. Exploration and production (E&P) exempt waste may be documented by non-hazardous waste manifests or bills of lading for transport.

Avant has established contracts with approved transportation companies for their common waste streams. Procedures include:

- All E&P waste will be trucked offsite. Truck transport will vary depending on the site location and volume of the waste produced;
- Fluids and produced water will be hauled in a tanker or vacuum truck and soil cuttings will be hauled in dump trucks;
- Prior to leaving the site location, the truck driver will complete a thorough inspection of the truck and waste to ensure that all valves, hatches, transfer lines, and other mechanisms are in the closed position and sealed if possible; and
- Avant personnel will supervise the off-loading process for waste products to ensure personnel safety and that the contents are secure to prevent leakage during transport.

Upon providing the above established corporate procedures, Avant requests NMOCD to approve closure of this incident.

ATTACHMENT A

Initial C-141 Release Notification & Corrective Action Form

District I
1625 N French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Bravos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

John B. & Chris G. 281-833-2742
State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr
Santa Fe, NM 87505

P. 1
Form 1-141
Revised October 1, 2003
Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company	SAMSON	Contact	JOHN BLEVINS
Address	P.O. Box 21022 TULSA OK	Telephone No.	432-661-5763
Facility Name	LEA FEB UNIT 22	Facility Type	DRILLING LOCATION
Surface Owner	State of NM	Mineral Owner	
		Lease No.	30.025.39010

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
H	12	20-S	34-E	1980	NORTH	980	EAST	LEA

Latitude 32.589308°N Longitude 103.507854°W

WTR 120'

NATURE OF RELEASE

Type of Release	DRILL CUTTINGS	Volume of Release		Volume Recovered	
Source of Release	AMIGO TRUCKING	Date and Hour of Occurrence	8/27/08	Date and Hour of Discovery	8/27/08
Was Immediate Notice Given?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	1245HR		1245HR
By Whom?		Date and Hour	8/27/08 1245HR		
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.			

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* TRUCK HAULING CUTTINGS FROM CLOSED LOOP SYSTEM TO LAND FARM LEAKING.
SEAL OFF BELLY DUMP

Describe Area Affected and Cleanup Action Taken.*

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.

Signature:	OIL CONSERVATION DIVISION		
Printed Name: JOHN BLEVINS	Approved by District Supervisor: <i>Mark Whitaker</i>		
Title: DRUG FOREMAN - SAMSON	Approval Date: 8/28/08	Expiration Date: 9.12.08	
E-mail Address:	Conditions of Approval:	Attached <input type="checkbox"/> IRP# 1937	
Date: 8/29/08 Phone: 432 661-5763	*		

* Attach Additional Sheets If Necessary

X SUBMIT FINAL REPORT STATING ACTION TAKEN TO PREVENT ANY FUTURE INCIDENTS OF THIS NATURE. SUBMIT FINAL BY 9.12.08. *JJ*

FGRL0824254553

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 333652

CONDITIONS

Operator: Avant Operating, LLC 1515 Wynkoop Street Denver, CO 80202	OGRID: 330396
	Action Number: 333652
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

Created By	Condition	Condition Date
bhall	The handwritten COA on the approved Initial C-141 stated, "Submit final report stating action taken to prevent any future incidents of this nature". Avant has complied with this COA. OCD has made the determination that this release closure is approved.	4/16/2024