

3R-1028

**Release Report/ General
Correspondence**

Remediation Plan

Date: 2014

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

Form C-141
Revised August 8, 2011

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Submit 1 Copy to appropriate District Office in
accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company Dominion Production Company, LLC	Contact David Burns
Address 1414 W Swann Av, Suite 100	Telephone No. 832 545 4600
Facility Name Hospah Land Farm	Facility Type

Surface Owner: Various	Mineral Owner: Various	API No. N/A
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LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
	1	17N	9W					

Latitude 35.735442 Longitude 107.739570

NATURE OF RELEASE

Type of Release: Production Water and Tank Bottoms	Volume of Release Not Known	Volume Recovered Not Known
Source of Release: Hospah Oil Tanks	Date and Hour of Occurrence N/A	Date and Hour of Discovery N/A
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour: Many Years.	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

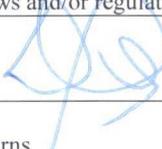
RCVD MAR 5 '14
OIL CONS. DIV.
DIST. 3

If a Watercourse was Impacted, Describe Fully.*
None

Describe Cause of Problem and Remedial Action Taken.*
Dominion did not create all of the waste. However as a prudent operator of the Hospah field Dominion has closed the land farm area and will proceed with the cleanup

Describe Area Affected and Cleanup Action Taken.*
A detailed Remediation Plan has been submitted along with this report detailing action and timelines proposed by Dominion.

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: David Burns	Approved by Environmental Specialist: 	
Title: President	Approval Date: <u>3/5/14</u>	Expiration Date:
E-mail Address: davidburns@dominionproduction.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: March 4, 2014	Phone: 832 545 4600	

* Attach Additional Sheets If Necessary

#NCS151975 4205

Appendix B

Micro-Bac Specification and MSDS Sheets



TECHNICAL DATA

M-1000 H™

For the Degradation of
Contaminated Substances

General Description

M-1000H is a biological product designed and formulated for the broad spectrum degradation of a variety of compounds found in contaminated and/or hazardous wastes. These compounds include simple aromatics such as benzene, toluene, ethyl benzene, and xylenes, as well as more complex aromatics like naphthalene, chlorinated compounds, and benzo-a-pyrene. Alkane mixtures, including transport fluids (gasoline and diesel), are also degraded. A variety of chlorinated aliphatic and aromatic compounds such as trichlorethene and chlorinated benzenes and biphenyls (PCBs) are also degraded. This product has been used successfully in a variety of *in-situ* and *ex-situ* applications. M-1000H consists of live, specially selected, biologicals and biochemicals, along with a supply of balanced nutrients in a ready to-use liquid medium. These microorganisms thrive in a variety of site conditions with diverse soils and various water chemistries. They are capable of using many of the listed hazardous waste chemicals as a carbon source.

Product Specifications

Color	light pink to tan
pH	6.5-8
Weight per gallon	8.51 lbs.
Specific gravity	1.02
Freeze point	32°F
Viscosity	1.30 cps - 60°F
Odor	mild organic

Application

M-1000H can be applied to contaminated or hazardous substances in numerous ways. For soil applications, the product can be sprayed, or the soil can be reduced to slurry and circulated with added product. For vadose zone or groundwater applications, the product can be applied into wells or infiltration galleries. Often the addition of specially-formulated nutrients can be used to augment the activity of the product in conditions where macro nutrients such as carbon, nitrogen, or phosphate are limited. A good monitoring program is critical to the success of any bioremediation project.

Handling and Safety

M-1000H is a natural, non-pathogenic, non-engineered biological product that meets EPA requirements for release in to the environment. Special clothing or equipment is not required for handling M-1000H. Routine hygiene should be observed.

Shipping

M-1000H is shipped in two sizes: in 5-gallon containers (45 lbs), and in 55-gallon containers (495 lbs), F.O.B. Round Rock, Texas.

Service

When the use of M-1000H is indicated, Micro-Bac International provides technical support services to its customers.

MICRO-BAC INTERNATIONAL, INC.
3200 N. IH-35
ROUND ROCK, TX 78681-2410
(512) 310-9000 FAX (512) 310-8800

MATERIAL SAFETY DATA SHEET

<u>Section 1. Identification</u>	M-1000H
<u>Section 2. Identity Information / Composition</u>	
Hazardous Components	None (TSCA 40 CFR 710.4 b)
Common Name	Microbial Product: Naturally occurring microorganisms
<u>Section 3. Physical Characteristics</u>	
Specific Gravity	1.02
Boiling Point	100°C
Melting Point	0°C
Solubility in Water	Water Soluble
Appearance and Odor	Light Pink to Tan Liquid with Moderate Odor
<u>Section 4. Fire and Explosion Hazard</u>	
Flash Point	NA
Flammable Limits	NA
Extinguishing Media	NA
Special Fire Fighting Procedures	None
Unusual Fire and Explosion Hazards	None
<u>Section 5. Reactivity Data</u>	
Stability	Stable
Incompatibility	None
Conditions to Avoid	Extreme Conditions
Hazardous Decomposition or Byproducts	None
<u>Section 6. Health Hazard Data</u>	
Routes of Entry	Ingestion; Eye Contact
Carcinogenicity (NTP or IARC)	None
Signs and Symptoms of Exposure	May Cause Gastric and/or Intestinal Upset
Emergency and First Aid Procedures	Ingestion: Do Not Induce Vomiting; Drink plenty of water Eye Contact: Flush with clean water for 10 minutes
<u>Section 7. Precautions for Safe Handling</u>	
Material Release or Spillage	Clean up with soap and water or with disinfectant
Waste Disposal Method	Flush with clean water
Handling and Storage Precautions	Store in tightly closed original container at temperatures between 13°C to 32°C
Ventilation Required	None Required
Respiratory Protection	None Required
Personal Protection	None required; use of gloves and safety glasses suggested
Work/Hygienic Practices	Routine

March 4, 2014

Brandon Powell
I & E Supervisor
Oil Conservation Division,
1000 Rio Brazos Road,
Aztec, NM 87410

ROVD MAR 5 '14
OIL CONS. DIV.
DIST. 3

Ref: Remediation Plan - Land Farm, Hospah NM

Brandon,

As requested I hereby provide to you our proposed remediation plan for the Land Farm at Hospah, NM. We have continued to pull down the water at the land farm and have now removed a total of around 1,400 barrels. All clean water was sent to our disposal tanks however at the request of the OCDNM we have stopped injecting this water underground pending a water analysis to determine water compatibility for injection. Any oil / sludge recovered is sent to storage tanks to settle and the good oil we are able to recover is sent for sale and the sludge that remains will be accumulated for off-site disposal, most likely at the Envirotech dirt farm near Farmington, NM. Please be aware that no sludge or oil contaminant is injected by us into our disposal system. Not only would this completely ruin our disposal capability but it would also cost us a sizeable amount of money to rectify and get rigs over them to wash out. We have significantly reduced the water on the surface at the Land Farm even though cold weather and associated icing has hampered the speed of removal.

As we pull down the levels at the Dirt Farm we have been digging back to observe the level of contamination in the ground. This is obviously not as accurate or as meaningful as a TPH method 8015 GRO/DRO and BTEX and Benzene method 8021 test will be however it is a good indicator for us to assess volumes and levels of contamination.



Water levels and oil level significantly lower.

H2S previously reported has abated and our monitors show no recognizable level of H2S present. It is basically the same level as the produced water from the field.

The plan proposed by Dominion is going to be contingent upon weather conditions and is likely to take several months to enact a full clean up. The outline plan is as below.

Plan

- 1: *Continue to remove all water and oil/sludge possible with Vacuum truck. We have sampled the water and dependent on results of water analysis the water may be dispatched to our disposal wells or to approved offsite disposal.*
- 2: *After surface is dry roll dirt from the back of the facility across the contaminated areas and thereafter apply bio remediation treatment from Micro-Bac. <http://micro-bac.com/products-services/bioremediation>*
- 3: *Allow microbes to act on oil staining for approximately 4-6 weeks*
- 4: *Collect samples at 5 point 100ft spacing across contaminated areas land farm and send for TPH method 8015 GRO/DRO and BTEX and Benzene method 8021 testing. Commence sampling at 6" depth and dependent on results back test at 1.5", 2.5" etc. (note: advise OCD to be present while collecting samples) Any additional testing will be agreed between Dominion and NMOCD representative(s).*
- 5: *After results of tests re roll dirt in areas still affected by contamination from back of land farm applying second batch of bio remediation microbes at recommended dosage.*
- 6: *Allow microbes to act on oil staining for approximately 4-6 weeks*
- 7: *Retest areas of previous failures to same standard (advise OCD of time to be present)*
- 8: *Dependent on results of second test haul off any remaining dirt to registered disposal farm and replace with clean dirt.*
- 9: *Make decision on reopening Land Farm after licensing and establishing operating procedure or close down, remove fence and flatten to complete remediation process.*

Timeline:

HOSPAPH LAND FARM REMEDIATION TIMELINE

Activity Timeline	2/28/14	3/31/14	4/30/14	5/31/14	6/30/14	7/31/14	8/31/14	9/30/14
Continue to remove all water and oil sludge with Vacuum truck	[Yellow bar]							
Roll Dirt and Apply Microbes		[Green bar]						
Treatment with Microbes			[Blue bar]					
Collect samples & Testing - Environtech				[Red bar]				
Roll Dirt and Apply second batch of Microbes					[Green bar]			
Treatment time second batch						[Blue bar]		
Collect samples & Testing - Environtech							[Red bar]	
Remove remaining contaminated dirt if any and replace								[Green bar]

The above plan is contingent on weather and remains subject to the continued availability of personnel and other resources. We are waiting until conditions are a little drier to apply the first treatment to get maximum benefit from the microbes. Dominion Production Company, LLC will endeavor to follow as closely as possible the time line above however in the event of any unexpected delays or changes to this schedule we will advise the OCD, NM accordingly. We will also track closely our time and resource costs along with any material used in the cleanup. I have attached a C-141 to this letter that states that although we did not create all this mess then Dominion Production Company, LLC as a prudent operator will clean up this site.

Yours truly

David Burns
President

CC: Charlie Perrin, ENMRD
Monica Kuehling, ENMRD
Daniel Sanchez, ENMRD

H. Scott Taylor, Branscomb PC.
T Hughes – Dominion Production Company, LLC
M Allen – Dominion Production Company, LLC

Appendix A - C-141 Report

Appendix B - Micro-Bac Specification and MSDS Sheets.

Appendix A

C-141 Form