

NM OIL CONSERVATION
ARTESIA DISTRICT

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

AUG 04 2017

State of New Mexico
Energy Minerals and Natural Resources

NM OIL CONSERVATION
ARTESIA DISTRICT

AUG 04 2017

Form C-141
Revised August 8, 2011

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

RECEIVED

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

RECEIVED

Release Notification and Corrective Action

NAB1723539529

OPERATOR

Initial Report Final Report

Name of Company <i>ROBINSON OIL INC. 37636</i>	Contact <i>JASON ROBINSON</i>
Address <i>P.O. Box 1829</i>	Telephone No. <i>432-234-8714</i>
Facility Name <i>HL #2 + #3 TANK BATTERY</i>	Facility Type <i>PRODUCTION</i>

Surface Owner	Mineral Owner	API No. <i>30-015-25070</i>
---------------	---------------	-----------------------------

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County

operator refused to provide coordinates (see email chain attached)

Tank battery not at either well APL location according to aerial + inspector

NATURE OF RELEASE

Type of Release <i>Oil</i>	Volume of Release <i>3 to 5 RBIS</i>	Volume Recovered <i>0</i>
Source of Release <i>TANK</i>	Date and Hour of Occurrence	Date and Hour of Discovery
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

determined upon delineation

If a Watercourse was Impacted, Describe Fully.*
Hole in production tank

Describe Cause of Problem and Remedial Action Taken.*
Hole in oil tank. Patched tank with fiberglass after removing remainder of fluid.

Describe Area Affected and Cleanup Action Taken.*
REMOVE AFFECTED AREA AROUND TANKS AS SAFELY AS POSSIBLE AND REPLACE WITH GOOD DIRT.

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.

OIL CONSERVATION DIVISION

Signature: <i>Jason Robinson</i>	Approved by Environmental Specialist: <i>[Signature]</i>
Printed Name: <i>Jason Robinson</i>	Approval Date: <i>8/29/17</i>
Title: <i>PRESIDENT</i>	Expiration Date: <i>NA</i>
E-mail Address: <i>ZERECIN@ROBINSON</i>	Conditions of Approval: <i>See attached</i>
Date: <i>8-1-2017</i>	Phone: <i>432-234-8714</i>

* Attach Additional Sheets if Necessary

8/29/17 AB

Operator/Responsible Party,

The OCD has received the form C-141 you provided on **8/4/17** regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 20P4355 has been assigned. **Please refer to this case number in all future correspondence.**

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

The responsible person shall complete division-approved corrective action for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC. [emphasis added]

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. **As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District II office in Artesia on or before 9/4/17. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.**

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

- Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.
- Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.
- Nominal detection limits for field and laboratory analyses must be provided.
- Composite sampling is not generally allowed.
- Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

- Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.

- If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.

- Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.

Jim Griswold

OCD Environmental Bureau Chief

1220 South St. Francis Drive

Santa Fe, New Mexico 87505

505-476-3465

jim.griswold@state.nm.us

Weaver, Crystal, EMNRD

From: Weaver, Crystal, EMNRD
Sent: Tuesday, August 15, 2017 7:50 AM
To: 'zekezenaludy@aol.com'
Cc: Bratcher, Mike, EMNRD; agroves@slo.state.nm.us
Subject: RE: Re:

Hello Jason,

Ok well we need to coordinates for the battery. We can open this release under a facility number and not an API but I need the coordinates for the battery. Please add those to the C-141 and resubmit.

Thank you,

Crystal Weaver

Environmental Specialist
OCD – Artesia District II
811 S. 1st Street
Artesia, NM 88210
Office: 575-748-1283 ext. 101
Cell: 575-840-5963
Fax: 575-748-9720

From: zekezenaludy@aol.com [mailto:zekezenaludy@aol.com]
Sent: Monday, August 14, 2017 10:54 PM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Subject: Re:

I dont know what the proper coordinates are for the battery, all the wells are along away from the battery, this is the way the lease was set up when we bought it from Fina years ago.

-----Original Message-----

From: Weaver, Crystal, EMNRD, EMNRD <Crystal.Weaver@state.nm.us>
To: Jason Robinson <zekezenaludy@aol.com>
Cc: Bratcher, Mike, EMNRD, EMNRD <mike.bratcher@state.nm.us>; Groves, Amber <agroves@slo.state.nm.us>
Sent: Mon, Aug 14, 2017 10:56 am
Subject: FW: Fwd:

Hello Jason,

Your C-141 form is missing coordinates for the location of the release along with legal description of location. Also with two APIs what will happen is we will open two separate case numbers for this spill and associate each API a case number. So is there an API number fort the battery or if not then is one of the API numbers already provided best to associate with the battery?

Crystal Weaver

Environmental Specialist

OCD – Artesia District II

811 S. 1st Street

Artesia, NM 88210

Office: 575-748-1283 ext. 101

Cell: 575-840-5963

Fax: 575-748-9720

From: zekezenaludy@aol.com [mailto:zekezenaludy@aol.com]

Sent: Friday, August 4, 2017 8:52 AM

To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Subject: Fwd:

-----Original Message-----

From: Jason Robinson <zekezenaludy@aol.com>

To: Jason Robinson <zekezenaludy@aol.com>

Sent: Thu, Aug 3, 2017 10:06 pm

Sent from my iPhone

Weaver, Crystal, EMNRD

From: zekezenaludy@aol.com
Sent: Friday, August 4, 2017 8:52 AM
To: Weaver, Crystal, EMNRD
Subject: Fwd:
Attachments: IMG_0670.JPG

-----Original Message-----

From: Jason Robinson <zekezenaludy@aol.com>
To: Jason Robinson <zekezenaludy@aol.com>
Sent: Thu, Aug 3, 2017 10:06 pm

Sent from my iPhone

Weaver, Crystal, EMNRD

From: Weaver, Crystal, EMNRD
Sent: Friday, July 21, 2017 4:46 PM
To: 'zekezenaludy@aol.com'
Cc: Morales, Tony, EMNRD; Bratcher, Mike, EMNRD; 'Groves, Amber'
Subject: FW: ROBINSON OIL INC STATE HL 2 002 / 003
Attachments: DSC00991 (1).jpg; DSC00992 (1).jpg; DSC00994.jpg; DSC00995 (3).jpg; DSC00996 (3).jpg

RE: Robinson Oil Inc. * State HL #2 & #3 tank battery for 30-015-25070 & 30-015-25178

Hello Mr. Robinson,

Thank you for providing me the email address that is best to reach you at during our phone call today. An OCD inspector came upon this contamination leak at the site location listed above and informed the Environmental team here in our OCD District II Office about the release as of 7/21/17. The release documented in the photos shows production fluid has impacting soil around the tank battery area. A potential point of release according to the photos attached above labeled "DSC00994", "DSC00995" & "DSC00996" depicts a point where a pipeline is leaking from the spot where it adjoins to the tank and it appears to have been continuous/ongoing for an unknown amount of time, due to that circumstance the volume of production fluids lost is deemed inconclusive. Therefore, OCD will require a form C-141 be sent into the District II Artesia Office on or before, **August 5, 2017**. Following that documentation OCD will submit to Robinson Oil Inc. a Conditions of Approval document (COA) which will provide information regarding delineation and remediation expectations. A representative of the State Land Office (SLO) has been copied on this correspondence, as records reflect the site being situated on SLO administered surface.

If you have any questions or concerns please contact myself or Mike Bratcher here at the OCD District II Office.

Crystal Weaver

Environmental Specialist
OCD – Artesia District II
811 S. 1st Street
Artesia, NM 88210
Office: 575-748-1283 ext. 101
Cell: 575-840-5963
Fax: 575-748-9720

-----Original Message-----

From: Morales, Tony, EMNRD
Sent: Friday, July 21, 2017 7:46 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Morales, Tony, EMNRD <Tony.Morales@state.nm.us>
Subject: ROBINSON OIL INC STATE HL 2 002 / 003

FYI

MR. MIKE BRATCHER

ROBINSON OIL INC TANK BATTERY STATE HL 2 002 / 003

Idle Well (Rule 19.15.25.8)

****TANK BATTERIES**

STAINING AROUND FLOWLINE TREATORS OK CONTAINMENT NEEDS REPAIR WEST BATTERY LEAKING CRUDE. SPOKE TO JASON ROBINSON RE: LEAK. WILL GET SOMEONE TO LOOK AT / REPAIR.

TONY MORALES, COMPLIANCE OFFICER

811 S. FIRST STREET

ARTESIA NM 88210

OFFICE: (575) 748-1283 EXT. 106

CELLULAR: (575) 703-0233

FAX: (575) 748-9720

E-MAIL: Tony.Morales@state.nm.us

Your message is ready to be sent with the following file or link attachments:

DSC00991 (1).jpg

DSC00992 (1).jpg

DSC00994.jpg

DSC00995 (3).jpg

DSC00996 (3).jpg

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.