AE Order Number Banner

Report Description

This report shows an AE Order Number in Barcode format for purposes of scanning. The Barcode format is Code 39.

App Number: pCS1430838889

3RP - 1019

WILLIAMS FOUR CORNERS

10/23/2017

OIL CONS. DIV DIST. 3

OCT 12 2017

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

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

Form C-141
Revised April 3, 2017

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 Williams Four Corners LLC	Contact Matt Webre
Address 1755 Arroyo Drive, Bloomfield, NM 87413	Telephone No. 505-632-4442
Facility Name Kutz Canyon Gas Plant	Facility Type Natural Gas Processing Plant

Surface Owner Bureau of Land Management	Mineral Owner	API No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
D	13	28N	11W					San Juan

Latitude 36.666589 **Longitude** -107.962877 NAD83

NATURE OF RELEASE

Type of Release Unknown	Volume of Release Unknown	Volume Recovered None
Source of Release Unknown (historical release)	Date and Hour of Occurrence Unknown	Date and Hour of Discovery 10/5/2017 12:00 PM
Was Immediate Notice Given? ☒ Yes ☐ No ☐ Not Required	If YES, To Whom? Cory Smith (OCD) and Whitney Thomas (BLM)	
By Whom? Matt Webre	Date and Hour OCD 10/5/2017 @ 2:45 PM; BLM 10/5/2017 @ 3:20 PM	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*
Gas Company of New Mexico (GCNM) encountered what appears to be hydrocarbon impacted soils while performing excavation activities along their new pipeline ROW. The ROW excavation is located on the western portion of the Kutz Canyon Gas Plant between the condensate tank and the west plant fence line. Up to 100 cubic yards of material has been excavated to depths ranging from 12-15 feet below ground surface. The source of the impacts is unknown but is potentially related to historical releases. On 10/5/2017 at noon, Williams requested the inspector for GCNM to stop work due to safety and environmental concerns. The work was immediately stopped as requested. The environmental coordinator for GCNM collected a sample on 10/5/2017 for laboratory analysis. Results are expected next week.

Describe Area Affected and Cleanup Action Taken.*
Williams will be coordinating with GCNM to address the impacts in conjunction with the new pipeline construction.

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: Matt Webre	Approved by Environmental Specialist:
Title: EHS Supervisor	Approval Date: 10/23/17 Expiration Date:
E-mail Address: matt.webre@williams.com	Conditions of Approval: Attached ☒
Date: 10/5/2017 Phone: (505) 632-4442	Sample for TPH (8015-GRO-DRO) BTEX, Benzene- if Dig and Haul Start By Dec 5, 2017 if other Submit work plan By Nov 5, 2017 Notify OCD 24 HR Prior to Samples

* Attach Additional Sheets If Necessary #NCS1729626631

(4)

Smith, Cory, EMNRD

From: Smith, Cory, EMNRD
Sent: Monday, October 23, 2017 8:01 AM
To: Webre, Matt (Matt.Webre@Williams.com)
Cc: Fields, Vanessa, EMNRD
Subject: Kutz Canyon Gas Plant C-141 Approval.
Attachments: C-141 Conditions Kutz Canyon Gas Plant .pdf

Matt,

OCD has approved the C-141 received on 10/12/17 with the following conditions of Approval.

- Williams did not clarify there remediation plan, IF Dig and Haul is the used remediation Williams must start no later than December 5, 2017 if any other type of remediation or delineation is proposed Williams must submit a work plan by November 5, 2017 for approval.
- Williams will sample for TPH(GRO-DRO-MRO/ORO), BTEX, Benzene
- Williams will provide the OCD at least 72 hours but no more than one week prior to the start of work.
- Williams will provide the OCD at least 24 hour notice before the collection of confirmation samples.

If you have any questions please give me a call

Cory Smith
Environmental Specialist
Oil Conservation Division
Energy, Minerals, & Natural Resources
1000 Rio Brazos, Aztec, NM 87410
(505)334-6178 ext 115
cory.smith@state.nm.us

Operator/Responsible Party,

The OCD has received the form C-141 you provided on 10/12/17 regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number NRS1729626631 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 III office in Aztec on or before 11/5/17. 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; C_6 thru C_{36}), 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; C_6 thru C_{36}), 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