NM OIL CONSERVATION
ARTESIA DISTRICT
JAN 14 2018
RECEIVED

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

NM OIL CONSERVATION
ARTESIA DISTRICT
JAN 14 2018
RECEIVED

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

nAB1801941807 — 241628

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: RKI Exploration / WPX Energy	Contact: James Raley
Address: 5315 Buena Vista Dr., Carlsbad, NM 88220	Telephone No: 575-689-7597
Facility Name: East Pecos Fed Com 22 #6H	Facility Type: Battery

Surface Owner: Private	Mineral Owner: Federal	API No.: 30-015-42281

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
O	22	26S	29E	250'	FSL	1840'	FEL	Eddy

Latitude 32.019925 N **Longitude** -103.968057 W

NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: 230 bbls PW	Volume Recovered: 180 bbls PW
Source of Release: Header Manifold	Date and Hour of Occurrence 12/31/2017 @ 09:15 AM	Date and Hour of Discovery 12/31/2017 @ AM
Was Immediate Notice Given? ☒ Yes ☐ No ☐ Not Required	If YES, To Whom? Aretesia District I, NMOCD – Mike Bratcher	
By Whom? Jim Raley – WPX Energy	Date and Hour: 12/31/2017 @ 5:53 PM	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume/Impacting the Watercourse. N/A	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*
A connecting piece on a produced water header failed, resulting in the release of approximately 230 bbls of produced water. A vac truck was immediately dispatched to location and recovered 180 bbls of fluids. Talon/LPE was contacted on 12/31/2017 and mobilized personnel to conduct initial site assessment.

Describe Area Affected and Cleanup Action Taken.*
The fluids migrated from the point of release along a pipeline ROW approx. 1400'. A one-call was placed for the impacted area and Talon/LPE mobilized equipment to perform soil sampling activities and remove visibly impacted soils. Removed soils were transported to disposal. Talon/LPE will develop a remediation plan based on sampling results.

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: Jim Raley	OIL CONSERVATION DIVISION
Printed Name: Jim Raley	Approved by Environmental Specialist: Crystal Walker
Title: Environmental Specialist	Approval Date: 1/19/18 — Expiration Date: N/A
E-mail Address: james.raley@wpxenergy.com	Conditions of Approval: See attached — Attached ☒ 2RP-4577
Date: 1/13/2018 Phone: 575-689-7597	

* Attach Additional Sheets If Necessary//

1/18/BAB

Operator/Responsible Party,

The OCD has received the form C-141 you provided on **1/14/18** regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 2RP-4577 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 2/14/18. 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

Weaver, Crystal, EMNRD

From: Raley, Jim <James.Raley@wpxenergy.com>
Sent: Sunday, January 14, 2018 10:02 AM
To: Weaver, Crystal, EMNRD; Bratcher, Mike, EMNRD
Cc: Raup, Bob; Blaney, Karolina; Kimberly M. Wilson
Subject: RE: Initial Spill Notification East Pecos 22-6
Attachments: C-141 East Pecos.pdf

Please find attached C-141 for this incident.

Jim Raley | Environmental Specialist - Permian Basin
5315 Buena Vista Dr., Carlsbad, NM 88220
C: (575)689-7597 | james.raley@wpxenergy.com

-----Original Message-----
From: Raley, Jim
Sent: Sunday, December 31, 2017 5:53 PM
To: EMNRD Weaver Crystal <Crystal.Weaver@state.nm.us>; EMNRD Bratcher Mike <mike.bratcher@state.nm.us>
Cc: Raup, Bob <Bob.Raup@wpxenergy.com>; Blaney, Karolina <Karolina.Blaney@wpxenergy.com>
Subject: Initial Spill Notification East Pecos 22-6

We had a spill from an above ground produced water line at the East Pecos Fed 22-6H this afternoon. The source of the spill has been stopped there is no water impacted or threatened. Volume of the spill is still being estimated, but will be a reportable quantity. A C-141 will be submitted when details of the incident are confirmed.

Please feel free to contact me if there are any concerns.

Jim Raley | Environmental Specialist
WPX Energy-Carlsbad NM
575-689-7597