NM OIL CONSERVATION
ARTESIA DISTRICT
FEB 19 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

Form C-141
Revised April 3, 2017

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

fAB1805133323
nAB1805133508

# Release Notification and Corrective Action

## OPERATOR

☒ Initial Report ☐ Final Report

| | |
|---|---|
| Name of Company: RKI Exploration / WPX Energy 246382 | Contact: James Raley |
| Address: 5315 Buena Vista Dr. | Telephone No: 575-689-7597 |
| Facility Name: Brushy Gathering Facility | Facility Type: Produced Water Gathering Facility |

| | | |
|---|---|---|
| Surface Owner: Federal | Mineral Owner: Federal | API No. |

## LOCATION OF RELEASE

| Unit Letter | Section | Township | Range | Feet from the | North/South Line | Feet from the | East/West Line | County |
|---|---|---|---|---|---|---|---|---|
| | 25 | 26S | 29E | | | | | Eddy |

**Latitude 32.00576 Longitude -103.94400** NAD83

## NATURE OF RELEASE

| | | |
|---|---|---|
| Type of Release: Produced Water Release | Volume of Release: 10 bbls | Volume Recovered: 7 bbls |
| Source of Release: Above Ground Line | Date and Hour of Occurrence | Date and Hour of Discovery |
| Was Immediate Notice Given? ☒ Yes ☐ No ☐ Not Required | If YES, To Whom? Mike Bratcher | |
| By Whom? Jim Raley | Date and Hour: 2/5/2016 | |
| Was a Watercourse Reached? ☐ Yes ☒ No | If YES, Volume Impacting the Watercourse. | |

If a Watercourse was Impacted, Describe Fully.* N/A

Describe Cause of Problem and Remedial Action Taken.*
An above ground poly line that was not is use was damaged by a piece of heavy equipment, which resulted in the release of residual produced water to the soils in pipeline ROW. A vac truck was immediately dispatched to remove standing liquids and drain line. Line was removed. Impacted soils were confined to an area of approx 50'x50'. Spill was along Stateline road at coordinates 32.00576, -103.94400. Did not occur on facility.

Describe Area Affected and Cleanup Action Taken.*
Obviously impacted soils were removed and samples collected to determine depths of impacts.

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

Printed Name: Jim Raley

Title: Environmental Specialist

E-mail Address: james.raley@wpxenergy.com

Date: 2/19/2019 Phone: 575-689-7597

## OIL CONSERVATION DIVISION

Approved by Environmental Specialist:

Signed By Mike Bratcher

Approval Date: 2/20/18 Expiration Date: N/A

Conditions of Approval: See attached

Attached ☐ RP-4630

* Attach Additional Sheets If Necessary

Operator/Responsible Party,

The OCD has received the form C-141 you provided on 2/19/2018 regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 2RP-4103D 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 2 office in ARTESIA on or before 3/19/2018. 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

## Bratcher, Mike, EMNRD

**From:** Raley, Jim <James.Raley@wpxenergy.com>
**Sent:** Tuesday, February 20, 2018 6:45 AM
**To:** Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD
**Cc:** Tucker, Shelly; Blaney, Karolina
**Subject:** RE: [EXTERNAL] RE: Initial Notification - WPX Brushy Gathering Station

Mike,
The legal should be S25 T26S R29E.

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

**From:** Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]
**Sent:** Monday, February 19, 2018 4:49 PM
**To:** Raley, Jim <James.Raley@wpxenergy.com>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
**Cc:** Tucker, Shelly <stucker@blm.gov>; Blaney, Karolina <Karolina.Blaney@wpxenergy.com>
**Subject:** [EXTERNAL] RE: Initial Notification - WPX Brushy Gathering Station



Jim – Do have the STR for this site?

Thanks,

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108

**From:** Raley, Jim [mailto:James.Raley@wpxenergy.com]
**Sent:** Monday, February 19, 2018 4:34 PM
**To:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
**Cc:** Tucker, Shelly <stucker@blm.gov>; Blaney, Karolina <Karolina.Blaney@wpxenergy.com>
**Subject:** RE: Initial Notification - WPX Brushy Gathering Station

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

WPXENERGY

**From:** Raley, Jim
**Sent:** Tuesday, February 06, 2018 10:11 AM
**To:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; 'Weaver, Crystal, EMNRD' <Crystal.Weaver@state.nm.us>
**Cc:** 'Tucker, Shelly' <stucker@blm.gov>; Blaney, Karolina <Karolina.Blaney@wpxenergy.com>
**Subject:** Initial Notification - WPX Brushy Gathering Station

Good Morning,

This is a follow-up email in regards to a voicemail left for Mike Bratcher giving immediate notification on 2/5/2016 at 8:44 A.M of a release that occurred near our Brushy Booster Station.

An unauthorized release of approx. 10bbls/produced water occurred near our Brushy Draw Booster Station. This release was the result of equipment damage to a produced water transfer line that was being removed. The line had not been fully drained and the damage allowed fluids to impact soils along the State Line Road in an area of approx. 50'x50'. The spill is located at 32.00576,-103.94400 which I show as BLM surface. No water was threatened. The spill was mapped with a Trimble GPS

In giving verbal notification I had indicated that 80 bbls was recovered. Upon further investigation it was discovered that the additional fluids were from draining the damaged gathering line and did not impact soils. A C-141 will be submitted within the next 15 days.

WPX would like permission to remove impacted soils to a depth of 1' within the spill area and collect samples to delineate the vertical extent of the impacts.

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

## Weaver, Crystal, EMNRD

**From:** Raley, Jim <James.Raley@wpxenergy.com>
**Sent:** Tuesday, February 6, 2018 10:11 AM
**To:** Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD
**Cc:** Tucker, Shelly; Blaney, Karolina
**Subject:** Initial Notification - WPX Brushy Gathering Station

Good Morning,

This is a follow-up email in regards to a voicemail left for Mike Bratcher giving immediate notification on 2/5/2016 at 8:44 A.M of a release that occurred near our Brushy Booster Station.

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Jim Raley | Environmental Specialist - Permian Basin
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WPXENERGY