



July 25, 2019

Reference No.11183047

Mr. Bradford Billings  
Environmental Specialist  
New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

Dear Mr. Billings

**Re: Site Assessment Report and Closure Request - Addendum  
Phillips 66 NM-16 Bettis Road Release  
NMOCD #1RP-5185  
Lea County, New Mexico**

On behalf of Phillips 66 Pipeline, LLC (Phillips 66), GHD Services Inc. (GHD) is providing this Addendum to the November 1, 2018 Site Assessment Report and Closure Request (Assessment Report) for the NM-16 Bettis Road site (hereafter referred to as the "Site"). The Site is located on private land within Unit Letter J, Section 9, Township 22S, and Range 37E in Lea County, New Mexico. Geographical coordinates for the Site are 32.40291° North, 103.16432° West. The Site consists of a pipeline crossing approximately 0.3 miles west of NM Highway 18 and 150 feet north of Trull Lane (**Figure 2**).

## **1. Introduction**

Reference is made to the Assessment Report presenting results of the excavations and confirmation sampling that addressed impacts from a September 4, 2018 release of approximately 25 barrels (bbls) of crude oil from a 6-inch diameter pipeline. Notification of the release via Form C-141 Initial (**Attachment 1**) was provided to the New Mexico Oil Conservation Division (NMOCD) on September 5, 2018. Remediation case number 1RP-5185 was assigned to the Site by the NMOCD.

On November 15, 2018 Olivia Yu, NMOCD District 1, provided a response to the assessment that asked for clarification on some of the reported data. Clarification was provided back to NMOCD District 1 on November 20, 2018 (Christina Hernandez) on distance to nearby dwelling and sample depths and locations. One issue in dispute was the analytical result for sample BS-2-4, specifically the total petroleum hydrocarbon (TPH) gasoline range and diesel range organics (GRO+DRO) and how they compared to the NMAC Table 1: Closure Criteria for Soils Impacted by Release. GHD argued that since the sample was analyzed for GRO, DRO and MRO (Motor Oil Range Organics), the closure level for the Site from NMAC Table 1 was therefore 2,500 milligrams per kilogram (mg/kg). The District 1 correspondence with Ms. Yu and Ms. Hernandez are included as an **Attachment 1**.

In a March 21, 2019 meeting in Santa Fe with Brad Billings, interim NMOCD District 1 environmental specialist, it was explained that the closure criteria for all TPH soils concentrations with respect to GRO+DRO is 1,000 mg/kg, regardless whether or not the MRO TPH fraction was analyzed. Since BS-2-4 sample GRO+DRO concentration exceeded 2,500 mg/kg, closure for that area could not be granted.



## 2. Supplemental Soils Excavation and Confirmation Sampling

A Phillips 66 field crew and GHD technician returned to the Site on June 19, 2019 to excavate further in the BS-2 sample area. Approximately 4-5 additional cubic yards of material were excavated and a confirmation sample was collected at 8 feet depth and submitted for laboratory analysis of TPH full range, BTEX and chloride (laboratory report presented as **Attachment 2**). The confirmation sample BS-2-8 exhibited a TPH GRO+DRO concentration of 54.2 ppm, well below the NMAC Table 1 Closure Criteria. Summaries of the Site soil sample results are presented on GHD **Table 1** and **Figure 2**. All removed soils are stockpiled on-site, on plastic and bermed and will be hauled off-site to a licensed disposal facility.

## 3. Summary and Request for Closure

The excavation and sampling in the area of BS-2/SW-4 is in an area not affected by the Phillips 66 release. This area was excavated to accommodate 40 feet long replacement pipe joint. The BS-2/SW-4 area (see **Figure 2**) is more likely part of the larger impacted area possibly associated with the Targa pipelines that cross the area and are shown in the figure. The Phillips 66 pipeline release was in the area of BS-6/BS-7. The pipeline has been replaced and impacted soils in this area have been removed and confirmation samples are below NMAC Table 1 Closure Criteria.

Based on the supplemental soil sample results and in accordance with the agreed upon path forward as discussed in your office, Phillips 66 requests a no further action determination for this Site. With this closure request, a Final C-141 (**Attachment 3**) will be submitted with the requisite fee to NMOCD.

If you have any questions or comments with regards to this report, please do not hesitate to contact GHD's Albuquerque office at (505) 884-0672.

Sincerely,

GHD

Jeff Walker  
Senior Project Manager

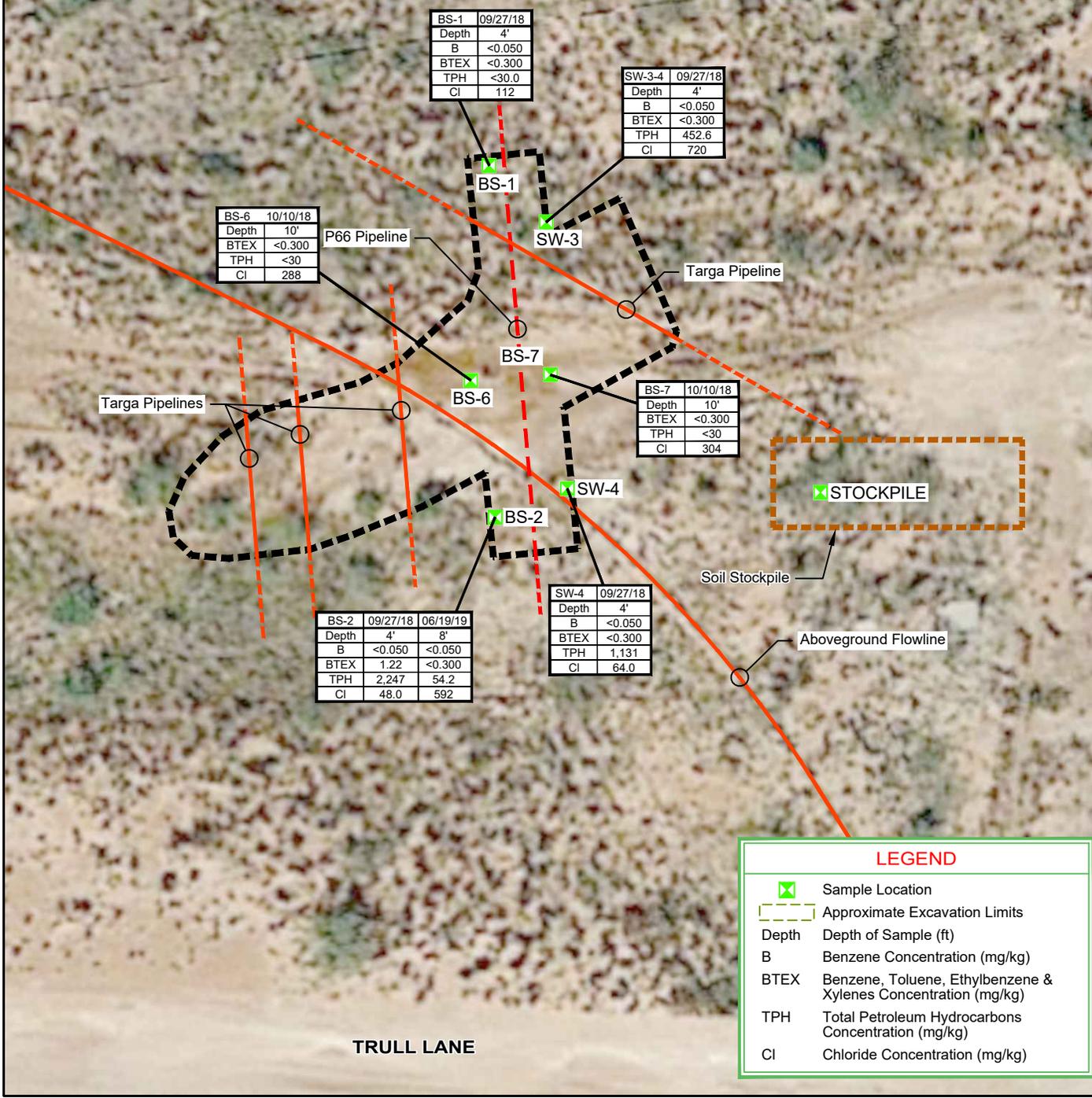
JW/mk/01

Encl. Figure 2  
Table 1  
Attachment 1 – 11/15/18 and 11/20/18 - Yu/Hernandez Responses  
Attachment 2 – Cardinal Laboratories Report  
Attachment 3 – Form C-141-Final

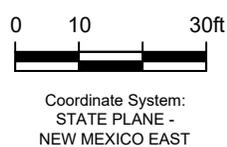
cc: Tiana Andriamanarivo, Environmental Specialist, Phillips 66

# Figures

**Site Coordinates**  
 Lat/Long 32.4029°, -103.1643°



Source: GOOGLE EARTH AERIAL IMAGE DATE NOVEMBER 2017



PHILLIPS 66 COMPANY  
 NM-16/BETTIS ROAD PIPELINE RELEASE  
 LEA COUNTY, NEW MEXICO

11183047-00  
 Jul 12, 2019

**SAMPLE LOCATION MAP**

**FIGURE 2**

# Tables

Table 1

P66 NM-16 Bettis Rd - Summary of Soil Analytical Data

Sample ID	Depth (feet)	Date	Benzene	Toluene	Ethyl-benzene	Xylenes	BTEX	TPH (GRO)	TPH (DRO)	TPH (ORO)	Total TPH	TPH Field Screen	Chloride
BS-1-4	4	9/17/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<0.10	<0.10	<0.10	<0.30	168	112
BS-2-4	4	9/17/2018	<0.050	0.115	<0.050	1.1	1.22	123	1980	144	2247	84	48
BS-2-8	8	6/19/2019	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	38.5	15.7	54.2	250	592
SW-3-4	4	9/17/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<0.10	411	41.6	452.6	162	720
SW-4-4	4	9/17/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<50.0	889	242	1131	--	64
BS-6-8	8	10/10/2018	--	--	--	--	--	--	--	--	--	2698	--
BS-6-10	10	10/10/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<0.10	<0.10	<0.10	<30	35	288
BS-7-10	10	10/10/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<0.10	<0.10	<0.10	<30	0	304
<b>NMOCD Table 1 Closure Limits</b>			<b>10</b>	<b>Total BTEX: 50</b>				<b>Total TPH: 2,500</b>				<b>10,000</b>	

Notes:

All sample results are in milligrams per kilogram  
 NMOCD = New Mexico Oil Conservation Division  
 Table 1 Closure Limits = In accordance with 19.15.29 Release Rule  
 BTEX = Benzene, Toluene, Ethylbenzene, Xylenes  
 TPH = Total Petroleum Hydrocarbons  
 GRO = Gasoline Range Organics  
 DRO = Diesel Range Organics-C10-C28  
 MRO = Oil Range Organics-C28-C35

# Attachments

**Attachment 1**  
**11/15/18 and 11/20/18**  
**Yu/Hernandez Responses**

**From:** [Jeffrey Walker](#)  
**To:** [Hernandez, Christina, EMNRD](#)  
**Cc:** [Batt, Aly H](#); "[filing-NA@ghd.com](#)"; "[Yu, Olivia, EMNRD](#)"  
**Subject:** RE: 1RP-5184 Assessment/Remediation and Closure Request ~COR-11183047~  
**Date:** Tuesday, November 20, 2018 10:42:00 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

Thank you Ms. Yu and Ms. Hernandez on your prompt review of our report and for your responses.

Please let me address your comments/questions as follows:

NMOCD: This release was assigned a 1RP-5185 P66/GHD: Noted and corrected.

NMOCD: Soil temperature of samples are above acceptable standard soil temperature ranges. P66/GHD: This is a case of samples being brought in from the field directly to the laboratory soon after collection. I talked with the GHD scientist who collected the samples and then drove them from the site near Eunice to Cardinal Lab in Hobbs (~20 mi.) and he indicated that the samples were indeed on ice during transit. The lab should have marked on the CoC that samples were "straight from the field" but instead asked if he wanted to bring them back in an hour with the idea they would register cooler! This of course is not practical and I will speak to the lab about a different protocol, one that is practiced by most other analytical lab. This said, GHD will indeed ensure that all laboratory samples are placed on ice immediately after sample collection.

NMOCD: Direct all subsequent notifications and email communications to Christina Hernandez. P66/GHD: Noted.

NMOCD: There appears to be a residential dwelling approximately 300-500 ft. NE of the release location. Please provide the GPS coordinates of the easternmost border of the release area for reassessment of remediation levels. P66/GHD: A screen shot of a Google Earth image showing the minimum distance between structure at nearby residence and closest point of release location is attached. The distance of 433 ft, allowing for cell phone GPS accuracy and the apparent structure being a horse barn-with the actual residence some distance further, is well out site the prescribed 300 ft distance in 19.15.29.12.C(4)(b) NMAC that would require reassessment of remediation levels. A kmz file via Agriplot shows pt. 5 as the closest point with GPS coord: 32.40300, 103.16428.

NMOCD: BS-2 at 4 ft. bgs has GRO + DRO fraction exceeding closure limits. This area needs to be addressed. P66/GHD: P66/GHD disagrees with your interpretation of the Table 1 NMAC closure criteria for the analyzed constituent, TPH. Under the 51 feet-100 feet depth to groundwater closure limits, the Constituent TPH (GRO+DRO+MRO) allows a closure limit of 2,500 mg/kg. If only GRO+DRO (next row down) are tested, the Table 1 closure criteria is 1,000 mg/kg. Sample BS-2-4 was analyzed for GRO+DRO+MRO and is below the closure criteria (2,500 mg/kg) for these constituents. The relevant portion of NMAC Table 1 is excerpted and included below.

NMAC Table 1: Closure Criteria for Soils Impacted by Release

Depth below bottom of release to ground water less than 10,000 mg/l TDS	Constituent	Method*	Limit**
51 feet-100 feet	Chloride***	EPA 300.0	10,000 mg/kg
	TPH (GRO+DRO+MRO)	EPA SW-846 Method 8015M	2,500 mg/kg
	GRO+DRO	EPA SW-846 Method 8015M	1,000 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg

	Benzene	EPA SW-846 Method 8021B or 8260B	10 mg/kg
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**NMOCD:** Please clarify. Was the entire impacted area excavated to 10 ft. bgs or just the area represented by BS-6 and BS-7 with the other sample locations only excavated to 4 ft. bgs? **P66/GHD:** The latter is correct, the area represented by BS-6 and BS-7 was excavated to 10 ft bgs to remove an area of visually stained soils. Excavated focused on visual observation of the fresh crude oil spill, resulting in different depths depending on how far the release penetrated, and confirmed with laboratory sampling.

**NMOCD:** Where was S-5 taken? Is this a sample from the stockpiled soil? **P66/GHD:** Yes.

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**From:** Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>  
**Sent:** Thursday, November 15, 2018 10:04 AM  
**To:** Jeffrey Walker <Jeff.Walker@ghd.com>  
**Cc:** Batt, Aly H <Aly.H.Batt@p66.com>; Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>  
**Subject:** RE: 1RP-5184 Assessment/Remediation and Closure Request

Good morning Mr. Batt/Walker:

Notes

- This release was assigned a 1RP-5185.
- Soil temperature of samples are above acceptable standard soil temperature ranges.
- Direct all subsequent notifications and email communications to Christina Hernandez.

Please address these concerns:

1. There appears to be a residential dwelling approximately 300-500 ft. NE of the release location. Please provide the GPS coordinates of the easternmost border of the release area for reassessment of remediation levels.
2. BS-2 at 4 ft. bgs has GRO + DRO fraction exceeding closure limits. This area needs to be addressed.
3. Please clarify. Was the entire impacted area excavated to 10 ft. bgs or just the area represented by BS-6 and BS-7 with the other sample locations only excavated to 4 ft. bgs?
4. Where was S-5 taken? Is this a sample from the stockpiled soil?

Thanks,  
Olivia

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**From:** [Jeff.Walker@ghd.com](mailto:Jeff.Walker@ghd.com) <[Jeff.Walker@ghd.com](mailto:Jeff.Walker@ghd.com)>  
**Sent:** Monday, October 29, 2018 10:47 AM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>  
**Cc:** Batt, Aly H <[Aly.H.Batt@p66.com](mailto:Aly.H.Batt@p66.com)>  
**Subject:** [EXT] 1RP-5184 Assessment/Remediation and Closure Request

Ms. Yu,

Please find attached the site assessment/remediation and closure request report for the subject site. Please contact myself or Mr. Batt with any questions regarding this document or the site.

Thank you-Jeff

**Jeffrey L. Walker**  
Sr. Project Manager

**GHD**

*Proudly employee owned*

T: +1 505 884 0672 | M: +1 505 377 3920 | E: [jeff.walker@ghd.com](mailto:jeff.walker@ghd.com)

6121 Indian School Road, NE Ste 200 Albuquerque NM 87110 USA | [www.ghd.com](http://www.ghd.com)

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# **Attachment 2**

## **Cardinal Laboratories Report**



June 25, 2019

JEFF WALKER

GHD SERVICES, INC.

6121 INDIAN SCHOOL RD, NE STE. 200

ALBUQUERQUE, NM 87110

RE: P66 NM16

Enclosed are the results of analyses for samples received by the laboratory on 06/19/19 15:05.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-18-11. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene".

Celey D. Keene

Lab Director/Quality Manager

**Analytical Results For:**

 GHD SERVICES, INC.  
 JEFF WALKER  
 6121 INDIAN SCHOOL RD, NE STE. 200  
 ALBUQUERQUE NM, 87110  
 Fax To:

Received:	06/19/2019	Sampling Date:	06/18/2019
Reported:	06/25/2019	Sampling Type:	Soil
Project Name:	P66 NM16	Sampling Condition:	Cool & Intact
Project Number:	11183047(BETTIS RD - PIPELINE RELEA'	Sample Received By:	Tamara Oldaker
Project Location:	LEA COUNTY, NM		

**Sample ID: BS - 2 - 8' (H902115-01)**

BTEX 8021B		mg/kg		Analyzed By: BF					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/20/2019	ND	1.78	89.2	2.00	2.66	
Toluene*	<0.050	0.050	06/20/2019	ND	1.76	87.9	2.00	2.19	
Ethylbenzene*	<0.050	0.050	06/20/2019	ND	1.70	85.1	2.00	2.34	
Total Xylenes*	<0.150	0.150	06/20/2019	ND	5.20	86.6	6.00	1.41	
Total BTEX	<0.300	0.300	06/20/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 117 % 73.3-129

Chloride, SM4500Cl-B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>592</b>	16.0	06/21/2019	ND	416	104	400	3.92	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/20/2019	ND	206	103	200	1.41	
<b>DRO &gt;C10-C28*</b>	<b>38.5</b>	10.0	06/20/2019	ND	176	88.2	200	6.16	
<b>EXT DRO &gt;C28-C36</b>	<b>15.7</b>	10.0	06/20/2019	ND					

Surrogate: 1-Chlorooctane 95.5 % 41-142

Surrogate: 1-Chlorooctadecane 98.2 % 37.6-147

Cardinal Laboratories

\*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



Celey D. Keene, Lab Director/Quality Manager

**Notes and Definitions**

- QR-03      The RPD value for the sample duplicate or MS/MSD was outside of QC acceptance limits due to matrix interference. QC batch accepted based on LCS and/or LCS/D recovery and/or RPD values.
- ND          Analyte NOT DETECTED at or above the reporting limit
- RPD        Relative Percent Difference
- \*\*          Samples not received at proper temperature of 6°C or below.
- \*\*\*        Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
- Samples reported on an as received basis (wet) unless otherwise noted on report



---

Celey D. Keene, Lab Director/Quality Manager



# **Attachment 3**

## **Form C-141-Final**

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 Department

Form C-141  
Revised August 24, 2018  
Submit to appropriate OCD District office

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

Incident ID	
District RP	
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party <u>Phillips 66</u>	OGRID
Contact Name <u>Aly Batt</u>	Contact Telephone <u>832 7653651</u>
Contact email <u>aly.h.batt@p66.com</u>	Incident # (assigned by OCD)
Contact mailing address <u>2331 Citywest Blvd (HQ N870-01) Houston, TX, 77042</u>	

### Location of Release Source

Latitude 32.40291 N Longitude -103.16432 W  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	Site Type <u>pipeline</u>
Date Release Discovered <u>3-4-2018</u>	API# (if applicable)

Unit Letter	Section	Township	Range	County

Surface Owner:  State  Federal  Tribal  Private (Name: \_\_\_\_\_)

### Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input checked="" type="checkbox"/> Crude Oil	Volume Released (bbls) <u>25 bbls</u>	Volume Recovered (bbls) <u>5 bbls</u>
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

A line flyer noticed a skin on the ground.

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC?  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? •
---	---

If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?  
*an email was sent ~~to~~ to Ms Yu (OCD) on September 5, 2018*

### Initial Response

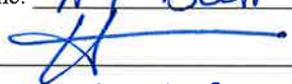
*The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury*

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.
--

If all the actions described above have not been undertaken, explain why:

Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.

Printed Name: Aly Batt Title: Env specialist  
 Signature:  Date: 9/7/2018  
 email: aly.h.batt@p66.com Telephone: 832 7653651

**OCD Only**  
 Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Incident ID	
District RP	
Facility ID	
Application ID	

## Site Assessment/Characterization

*This information must be provided to the appropriate district office no later than 90 days after the release discovery date.*

What is the shallowest depth to groundwater beneath the area affected by the release?	___ 89 ___ (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

<p><b><u>Characterization Report Checklist:</u> Each of the following items must be included in the report.</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.</li> <li><input type="checkbox"/> Field data</li> <li><input type="checkbox"/> Data table of soil contaminant concentration data</li> <li><input type="checkbox"/> Depth to water determination</li> <li><input type="checkbox"/> Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release</li> <li><input type="checkbox"/> Boring or excavation logs</li> <li><input type="checkbox"/> Photographs including date and GIS information</li> <li><input type="checkbox"/> Topographic/Aerial maps</li> <li><input type="checkbox"/> Laboratory data including chain of custody</li> </ul>
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If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

State of New Mexico  
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.

Printed Name: TIANA ANDRIAMANARIVO Title: SR. ENVIRONMENTAL CONSULTANT  
 Signature: Haingobiana Date: 7/19/2019  
 email: TIANA.ANDRIAMANARIVO@PEG.COM Telephone: (806) 318-9296

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Incident ID	
District RP	
Facility ID	
Application ID	

## Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

**Closure Report Attachment Checklist:** *Each of the following items must be included in the closure report.*

- A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

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**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_