

1R - 169

ENFORCEMENT

DATE:

1998

**NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT****OIL CONSERVATION DIVISION
DISTRICT I Hobbs
PO BOX 1980
Hobbs, NM 88241-1981
(505) 393-6181****Jennifer A. Salisbury**
CABINET SECRETARY**Certified Mail: P 209 878 115**
Returned Receipt Requested:

October 30, 1998

Chris D. Mitchell
GP II Energy, Inc.
P.O. Box 50682
Midland, Tx 79710**Subject: NOTICE OF VIOLATION- Failure to report spill pursuant to NMOCD
Rule 116.****Re: C-141 dated 10-21-98 (copy attached)**
Langlie Jal Unit Well #75
UL D-Sec 9-Ts25s-R37e

Dear Mr. Mitchell;

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the above referenced C-141 which indicated GPII had a spill on October 17, 1998 in which a watercourse was reached. Initial verbal reporting of this incident to NMOCD personnel on 10-17-98 did not reveal this fact. On 10-19-98 OCD District I personnel inspected the site and it was noted that produced water from the flow line did indeed reach a small playa lake. The field inspector instructed GP II to sample the playa lake at point of entry and report the findings. NMOCD has not received this information. It has also been noted there was a significant rainfall event that Monday night, October 19, 1998, which might invalidate the results if taken after this time.

OCD District I office has contacted the OCD Environmental Bureau concerning this issue and they have indicated as of October 29, 1998 GPII has yet to make the proper notification pursuant to NMOCD Rule 116.

Therefore GPII is hereby directed to provide the OCD District I office within 10 days of receipt of this letter a detailed report and explanation as to why this spill was not reported factually initially and why there was no immediate notification to the NMOCD Environmental Bureau (505-827-7152). Please note GPII is also required to provide written notification to the OCD Environmental Bureau with 15 days of the release per Rule 116 when water is impacted.

Please note after NMOCD receives GPII's written response, NMOCD will then notify GPII of any subsequent requirements or a special hearing will be held to determine if GPII shall be assessed civil or criminal penalties as allowed by the New Mexico Oil and Gas Act.

Sincerely,

Chris Williams-District I Supervisor

CW/wp file:CT/wpdocs/gpii-1

cc: Roger Anderson-Bureau Chief
Hobbs Spill & Environmental file

attachments-1

STATE OF NEW MEXICO

FACSIMILE TRANSMITTAL SHEET

TO: WAYNE PRICE	FROM: DONNA WILLIAMS
FAX NUMBER: 827-8177	DATE: MAY 3, 1999
COMPANY: OIL CONSERVATION DIVISION	TOTAL NO. OF PAGES INCLUDING COVER: 2
PHONE NUMBER: 827-7155	SENDER'S REFERENCE NUMBER:
RE: GP-II	YOUR REFERENCE NUMBER: 505-393-6161 EXT...113

 URGENT FOR REVIEW PLEASE COMMENT PLEASE REPLY PLEASE RECYCLE

NOTES/COMMENTS:

WAYNE,

HERE IS THE COPY OF GP-II NOTICE OF VIOLATION. LIKE I HAD STATED IN MY VOICE MAIL TO YOU, THERE WAS ONLY ONE N.O.V. IN THE FILE? THAT WAS ALL, IF YOU NEED ANYTHING JUST CALL.

SINCERELY,

DONNA



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
DISTRICT I HOBBS
PO BOX 1980, Hobbs, NM 88241
(505) 393-6161
FAX (505) 393-0720

Jennifer A. Salisbury
CABINET SECRETARY

March 12, 1999

Mr. Chris Mitchell
GP II Energy, Inc.
P.O. Box 50682
Midland, Tx 79710

Re: Langlie Jal Unit Well #43
Langlie Jal Unit Well #9
Langlie Jal Unit Location: UL-J, Sec 6, Ts 25s, R 37e

Subject: C-141's - Sampling Events

Dear Mr. Mitchell,

New Mexico Oil Conservation Division (NMOCD) is in receipt of three C-141s that was submitted to NMOCD by GP II.

1. Langlie Jal Unit Well #43: According to the State Engineers Office the depth to groundwater is 58 feet.
2. Langlie Jal Unit Well #9: According to the State Engineers Office the depth to groundwater is 59 feet.
3. Langlie Jal Unit Location: UL-J, Sec 6, Ts 25s, R 37e: because of the amount of water released GP II will need to adhere to NMOCD guidelines.

Please submit to NMOCD a risk assessment and a remediation plan on each of the locations listed above by April 30th. If you have any questions or require any further information or assistance please do not hesitate to call (505-393-6161 ext...113) or write this office.

HAVE NOT RESPONDED!

Sincerely,

Donna Williams-Environmental Engineer

Cc: Chris Williams, Wayne Price



NEW MEXICO ENERGY, MINERALS
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March 12, 1999

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GP II Energy, Inc.
P.O. Box 50682
Midland, Tx 79710

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Jennifer A. Salisbury
CABINET SECRETARY

August 1, 1998

Chris D. Mitchell
GP II Energy, Inc.
P.O. Box 50682
Midland, TX 79710

Re: Submitted C-141's for Recent Leaks & Spills at the GPII North and South Injection Stations;
UL G sec 5-Ts25s-R37e (North Station) and UL I sec 8-Ts25-R37e (South).

<u>LIST:</u>	<u>Facility Name:</u>	<u>Location:</u>	<u>Date of Spill:</u>
<input type="checkbox"/> Initial <input type="checkbox"/> Final	North InJ St.	SAB	2-18-98
<input type="checkbox"/> Initial <input type="checkbox"/> Final	North InJ St.	SAB	2-20-98
<input type="checkbox"/> Initial <input type="checkbox"/> Final	North InJ St.	SAB	3-07-98
<input type="checkbox"/> Initial <input type="checkbox"/> Final	North InJ St.	SAB	3-16-98
<input type="checkbox"/> Initial <input type="checkbox"/> Final	North InJ St.	SAB	3-17-98
<input type="checkbox"/> Initial <input type="checkbox"/> Final	South Inj. St.	SAB	2-06-98 (Not Reported per Rule 116)
<input type="checkbox"/> Initial <input type="checkbox"/> Final	South Inj. St.	SAB	3-26-98
<input type="checkbox"/> Initial <input type="checkbox"/> Final	South Inj. St.	SAB	5-10-98

Dear Mr. Mitchell:

New Mexico Oil Conservation Division (NMOCD) is in receipt of the C-141's referenced above and a copy attached. The NMOCD has evaluated these reports and has the following comments and conditions:

South Inj. ST:

2-06-98 (ACTION REQUIRED)

GP II failed to report this spill which impacted a small playa lake (dry at time of spill) to the southeast of the facility. The NMOCD has given verbal warning to Mr. Mitchell, representative of GPII, and has instructed him to report all applicable leaks & spills per rule 116 and perform appropriate corrective actions in the future. Mr. Mitchell and GPII are new to New Mexico and was not aware of our rules & regulations.

GP II removed the free liquid and has made an attempt to remove some of the salt stain out of the playa, however there still remains salt residues. Therefore, please submit a work plan for NMOCD approval to address this issue within 30 days of receipt of this letter. Include in your letter a commitment by GPII to report all Leaks & Spills in the future pursuant to NMOCD Rule 116. (Rule 116 copy enclosed and guidelines)

3-26-98 & 5-10-98: (NO FURTHER ACTION REQUIRED AT THIS TIME)

GPII has submitted Final C-141's. NMOCD has reviewed the C-141's on the list and have approved these to be filed in the NMOCD District I Spill Files without further requirements at this time. NMOCD reserves the right to require additional information and/or actions pertaining to these report(s) if so warranted.

Please note acceptance of these "Initial or Final" reports by NMOCD does not relieve GPII of liability should their operations fail 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 including additional requirements from NMOCD Environmental Bureau.

2-18-98 & 2-20-98 & 3-07-98: (NO FURTHER ACTION REQUIRED AT THIS TIME)

GPII has removed free liquids and disposed of contaminated soils at Sundance Services and cleaned up location and lease roads. Pictures and plot plan was submitted for verification. NMOCD also has made resultant field trips for verification. NMOCD has reviewed the C-141's on the list and have approved these to be filed in the NMOCD District I Spill Files without further requirements at this time. NMOCD reserves the right to require additional information and/or actions pertaining to these report(s) if so warranted.

Please note acceptance of these "Initial or Final" reports by NMOCD does not relieve GPII of liability should their operations fail 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 including additional requirements from NMOCD Environmental Bureau.

3-16-98 & 3-17-98: (ACTION REQUIRED)

GPII has indicated fluids removed and hauled off oily dirt. In order for GPII to receive closure please send to NMOCD disposal waste tickets, Invoices, manifest etc for verification. Please provide within 30 days of receipt of this letter.

If you require any further information or assistance please do not hesitate to call (505-393-6161) or write this office.

Sincerely Yours,

Wayne Price-Environmental Engineer

cc: Chris Williams-NMOCD District I Supervisor
Bill Olson-Environmental Bureau, Santa Fe, NM

file: wp98/gpii