

1R - 2008

**GENERAL  
CORRESPONDENCE**

**YEAR(S):**

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1997



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

December 11, 1997

Mr. Davis Payne  
Polaris Production Corp. (PPC)  
P.O. Box 1749  
Midland, Texas 79702-1749

Re: C-141 release report dated Nov. 12, 1997  
Shelton Lease Tank Battery  
UL F Sec 26-Ts14s-R37e

Dear Mr. Payne:

New Mexico Oil Conservation Division (NMOCD) is in receipt of the C-141 report for the above referenced site. On November 12, 1997 the NMOCD visited the site and collected soil samples, noted site conditions and took pictures. (attached)

The preliminary results of the soil samples indicate these soils are highly contaminated as defined in the NMOCD guidelines for leaks & spills. Your submitted C-141 report indicates PPC released 650 barrels of oil and water and recovered 650 barrels. The NMOCD finds this to be inconsistent of its findings. Field observations and results of test reflect these soils to have high concentrations of Total Petroleum Hydrocarbons ranging greater than > 4%-8%, with volatile organics present that exceed the soil guideline clean-up standards and the New Mexico groundwater standards. The NMOCD noted areas of the location where free oil was still visible and puddled in low lying areas. (see attached pictures)

The NMOCD has reviewed the area geohydrology and the above referenced site is located within a declared underground water basin (Lea County) New Mexico as designated by the NM State Engineers office. Their data base indicates there is shallow groundwater (less than <100 feet below ground surface) underlying your facility. Due to the presence of shallow groundwater the NMOCD is concerned about possible groundwater contamination from your present and/or past operating practices.

Since your C-141 was marked as an initial report, the NMOCD will require PPC to perform the following actions in order to evaluate if your corrective actions are sufficient to provide protection to groundwater, public health, and environment pursuant to NMOCD rule 19 NMAC 15.C 11.D.

Page 1 of 2

1. Collect two samples of the soil three feet below the surface in the immediate area of the leak and in the area where the leak pooled.
2. Take at least one composite sample of any soils that have been diluted, mixed, or remediated to verify the levels of soils contaminants.
3. Take at least one composite surface sample of the impacted areas that are off of the pad, such as in the grass areas.

Please perform the following analysis on all samples:

- \* Total Petroleum Hydrocarbons (EPA Method 418.1 or 8015-M).
- \* BTEX (EPA Method 8020).
- \* Total Chlorides (EPA general chemistry)

**Note:** The sampling protocol shall be pursuant to the NMOCD Guidelines and/or EPA SW-846 methods. In order to assist you in these matters the NMOCD recommends that you contact your consultant and/or the laboratory to ensure you are taking and collecting the sample correctly.

4. Please provide the following site assessment information:
  - A. Actual depth to groundwater as defined in NMOCD guidelines.
  - B. Actual distance in feet to any Wellhead Protection Area, municipal wells, domestic, windmills etc.
  - C. Distance to nearest Surface Water Body such as ponds, lakes, rivers, playas, etc.
5. Please notify NMOCD 48 hours in advance so as we may have the opportunity to witness collection of samples.

**Please submit your findings as outlined above within 60 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  
Roger Anderson-Environmental Bureau Chief, Santa Fe, NM  
Karen Sharp- Spill file  
attachments- cc of C-141, pictures, field notes & analytical data, guidelines.

P. O. Box 1980  
 Hobbs, NM 88241-1980  
 District II - (505) 748-1283  
 811 South First  
 Artesia, NM 88210  
 District III - (505) 334-6178  
 1000 Rio Brazos Road  
 Aztec, NM 87410  
 District IV - (505) 827-7131

**Energy Minerals and Natural Resources Department**  
**Oil Conservation Division**  
 2040 South Pacheco Street  
 Santa Fe, New Mexico 87505  
 (505) 827-7131

Originated 2/13/97  
  
 Submit 2 copies to  
 Appropriate District  
 Office in accordance  
 with Rule 116 on  
 back side of form

**Release Notification and Corrective Action**

**OPERATOR**

Initial Report     Final Report

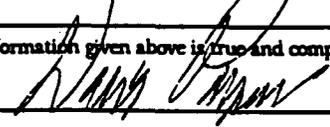
Name Polaris Production Corp.	Contact Davis Payne
Address P. O. Box 1749, Midland, TX 79702-1749	Telephone No. 915/684-8248
Facility Name Shelton Lease	Facility Type Crude Oil Tank Battery

Surface Owner Wier Brothers	Mineral Owner Many and various	Lease No. 009357
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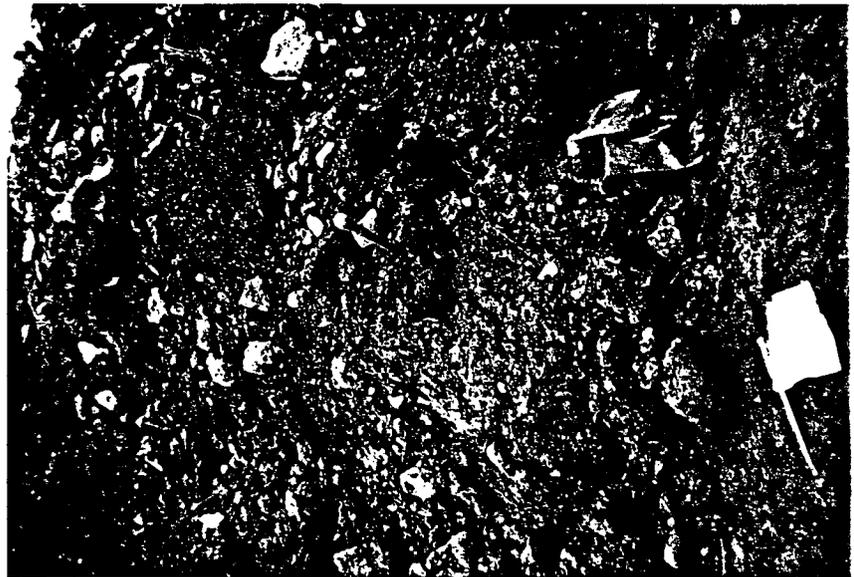
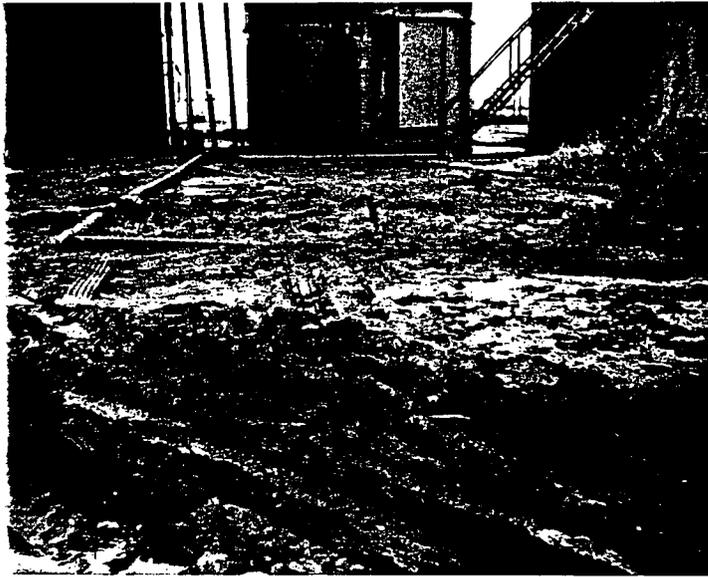
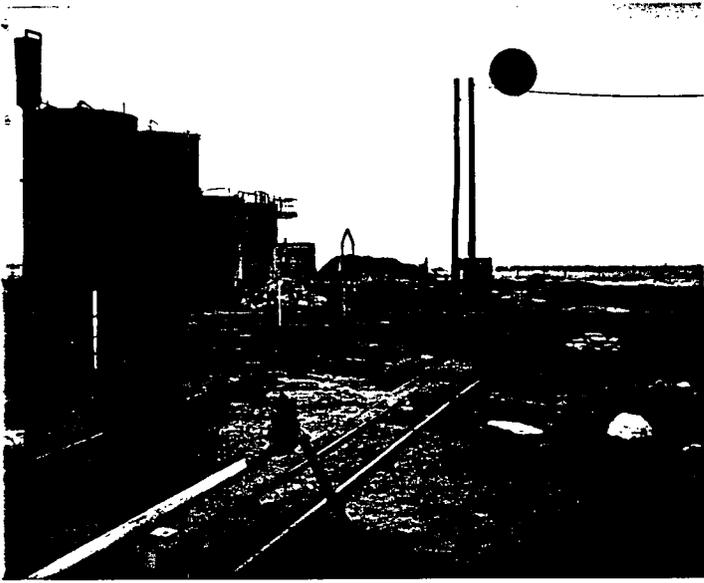
**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
F	26	14-S	37-E	1500	North	1500	West	Lea

**NATURE OF RELEASE**

Type of Release Oil and Water	Volume of Release 650 bbls.	Volume Recovered 650 bbls.
Source of Release 750 bbl. wash tank	Date and Hour of Occurrence 10-7-97 11:00 PM	Date and Hour of Discovery 10-8-97 6:00 AM
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? OCC at Hobbs	
By Whom? Davis Payne	Date and Hour 10-8-97 @ 8:45 AM	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. ---	
If a Watercourse was impacted, Describe Fully: NA		
Describe Cause of Problem and Remedial Action Taken.* A severe thunderstorm or mild tornado ripped the gas boot from its attachment to the wash tank leaving the tank open at the bottom to drain. Immediately upon discovery, a vacuum truck was called to pick up the spilled fluids.		
Describe Area Affected and Cleanup Action Taken.* The area around the tank battery was flooded, but all the fluids were picked up and put back in the wash tank. After drying out, the affected dirt was removed and mixed with sand to be re-used.		
Describe General Conditions Prevailing (Temperature, Precipitation, etc.).* This spill occurred during an approximate 2 1/2" thunderstorm and the temperature was approximately 60 degrees Fahrenheit.		
I hereby certify that the information given above is true and complete to the best of my knowledge and belief. Signature: 	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Davis Payne	Approved by District Supervisor:	
Title: President	Approval Date:	Expiration Date:
Date: 11-12-97    Phone: 915/684-8248	Conditions of Approval:	Attached <input type="checkbox"/>

\* Attach Additional Sheets If Necessary



01-12-97  
NMOCID: ID#.730674 By: W Price #9  
Date/Time: Nov. 12, 1997 12 noon  
Site/Co. Polaris-Shelton Tk Batt.  
Location: UL F-Sec 26-Ts14s-R37e  
Subject: NE of Batt. looking WSW.

01-12-97  
NMOCID: ID#.730674 By: W Price #1  
Date/Time: Nov. 12, 1997 12 noon  
Site/Co. Polaris-Shelton Tk Batt.  
Location: UL F-Sec 26-Ts14s-R37e  
Subject: Soil sample #1 NW of batt.  
looking SE.

01-12-97  
NMOCID: ID#.730674 By: W Price #11  
Date/Time: Nov. 12, 1997 12 noon  
Site/Co. Polaris-Shelton Tk Batt.  
Location: UL F-Sec 26-Ts14s-R37e  
Subject: North of Batt. looking  
South.

01-12-97  
NMOCID: ID#.730674 By: W Price #2  
Date/Time: Nov. 12, 1997 12 noon  
Site/Co. Polaris-Shelton Tk Batt.  
Location: UL F-Sec 26-Ts14s-R37e  
Subject: Soil sample #2 Soil Pile  
West-

01-12-97  
NMOCID: ID#.730674 By: W Price #12  
Date/Time: Nov. 12, 1997 12 noon  
Site/Co. Polaris-Shelton Tk Batt.  
Location: UL F-Sec 26-Ts14s-R37e  
Subject: North of Batt. looking  
West. OIL POOLED

01-12-97  
NMOCID: ID#.730674 By: W Price #5  
Date/Time: Nov. 12, 1997 12 noon  
Site/Co. Polaris-Shelton Tk Batt.  
Location: UL F-Sec 26-Ts14s-R37e  
Subject: South of Batt. looking NW  
Sample #3 (Soil #2)

cc: BP  
FOUR FIVE

NEW MEXICO OIL CONSERVATION COMMISSION  
FIELD TRIP REPORT

x 12 NOV

Name WAYNE PRICE Date 11/12/97 Miles \_\_\_\_\_ District I  
 Time of Departure 7 AM Time of Return 4 PM Car No. G 0472 1

In the space below indicate the purpose of the trip and the duties performed, listing wells or leases visited and any action taken.

Signature Wayne Price

INSPECTION	CLASSIFICATION	FACILITY	HOURS	QUARTER HOURS
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POLARIS - SHELTON LEASE

CLOUDY ≈ 43°F  
MIST RAIN

- NO SIGNS -

TOOK PICTURES, COLLECTED SOIL SAMPLES  
OIL & WATER ALL OVER LOCATION

<u>Mileage</u>	<u>Per Diem</u>	<u>Hours</u>
UIC _____	UIC _____	UIC _____
RFA _____	RFA _____	RFA _____
Other _____	Other _____	Other _____

<u>TYPE INSPECTION PERFORMED</u>	<u>INSPECTION CLASSIFICATION</u>	<u>NATURE OF SPECIFIC WELL OR FACILITY INSPECTED</u>
H = Housekeeping	U = Underground Injection Control - Any inspection of or related to injection project, facility, or well or resulting from injection into any well. (SWD, 2ndry injection and production wells, water flows or pressure tests, surface injection equipment, plugging, etc.)	D = Drilling
P = Plugging	R = Inspections relating to Reclamation Fund Activity	P = Production
C = Plugging Cleanup	O = Other - Inspections not related to injection or The Reclamation Fund	I = Injection
T = Well Test	E = Indicates some form of enforcement action taken in the field (show immediately below the letter U, R or O)	C = Combined prod. inj. operations
R = Repair/Workover		S = SWD
F = Waterflow		U = Underground Storage
M = Mishap or Spill		G = General Operation
W = Water Contamination		F = Facility or location
O = Other		H = Meeting
		D = Other

11/17/77 ● - POLARIS - SHELTON LEASE

SAMPLE #1 418.1 PIL 1:1 >40K\* PID 77

SAMPLE #2 (SOL FILE) >40K\* 75

SAMPLE #3 >80K\* HEAT STABLE 174 PPM \*

Buck dentific  
model 404  
TAK samples  
ES+S - Bob Allison

Stephan  
NMOCD  
NO GR/CC ON SAMPLES!

SAMPLES VERY OILY + AROMATIC  
RAW SAMPLES ON 418.1 + PID

\* EXCESS GUIDE LINES



PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR  
 NMOCD  
 ATTN: WAYNE PRICE  
 P. O. BOX 1980  
 HOBBS, NM. 88241  
 FAX TO:

Receiving Date: 11/17/97  
 Reporting Date: 11/18/97  
 Project Number: NOT GIVEN  
 Project Name: POLARIS  
 Project Location: SHELTON LEASE

Sampling Date: 11/12/97  
 Sample Type: SOIL  
 Sample Condition: INTACT  
 Sample Received By: GP  
 Analyzed By: GP

*WQCC*  
*NM GROUNDWATER STAND-ARDS*

		<i>.01</i>	<i>.75</i>	<i>.75</i>	<i>.62</i>
		BENZENE	TOLUENE	ETHYL	TOTAL
		(mg/Kg)	(mg/Kg)	BENZENE	XYLENES
LAB NO.	SAMPLE ID			(mg/Kg)	(mg/Kg)

ANALYSIS DATE		11/17/97	11/17/97	11/17/97	11/17/97
H3321-1	SOIL SMPL #1	0.032*	0.407	0.011	1.625*
H3321-2	SOIL PILE (WEST)	<0.002	0.076	0.040	0.472
H3321-3	SOIL SMPL #2	0.003	0.076	0.034	0.306
Quality Control		100	97	102	306
True Value QC		100	100	100	300
% Recovery		100	97	102	102
Relative Percent Difference		0.8	2.6	11.2	5.4

METHOD: EPA SW 846-8020, 5030, Gas Chromatography

*\* EXCEEDS NM WQCC*

*[Signature]*  
 Chemist

*11/18/97*  
 Date

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 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 services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.

