



27 May 2015

Mr. Mike Bratcher
Environmental Specialist
NMOCD
811 S. First St.
Artesia, New Mexico 88210

**Re: Initial C-141
Vanguard
Water Disposal Line
UL-P, Section 12, Township 20 South, Range 29 East
Eddy County, New Mexico**

Mr. Bratcher:

Environmental Plus, Inc. (EPI), on behalf of Mr. JT Terry, Vanguard, submits the attached form C-141 for the above-referenced leak site, located on land owned by the State of New Mexico and administered by the BLM.

The site is located approximately 16 miles northeast of Carlsbad, New Mexico (reference *Figure 1*). A search for water wells was completed utilizing the New Mexico Office of the State Engineer's website and a United States Geological Survey (USGS) database. A total of seven (7) wells are located in the area surrounding the release site (reference *Table 1*). No wells (domestic, agriculture or public) and no bodies of surface water exist within a 1,000-foot radius of the release site (reference *Figure 2*). Groundwater data indicated the average water depth is approximately 40 feet below ground surface (bgs). The attached site information and ranking form ranks the site in accordance with the New Mexico Oil Conservation Division (NMOCD) Guidelines for Remediation of Leaks, Spills and Releases (August 13, 1993).

The release occurred when a polyline failed due to traffic on the lease road. Approximately 10 bbls of water were released with 5 bbls picked up by vacuum truck (reference *Figure 3* and attached photographs). Based on available information, it was projected distance between impacted soil and groundwater is approximately 40 vertical feet. Utilizing this information, NMOCD Recommended Remedial Action Levels (RRALs) for this Site were determined as follows:

Parameter	Recommended Remedial Action Level
Benzene	10 parts per million
BTEX	50 parts per million
TPH	100 parts per million
Chloride	250 parts per million



Should you have any questions or concerns please feel free to contact me at (575) 394-3481 or via e-mail at ddominguezepi@gmail.com or Mr. JT Terry at (432) 362-2209 or via e-mail at jterry@vnrllc.com. All official communication should be addressed to:

Mr. JT Terry
Vanguard
4001 Penbrook, Suite 201
Odessa, Texas 79762

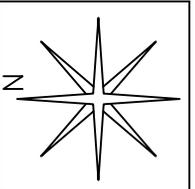
Sincerely,

ENVIRONMENTAL PLUS, INC.

Daniel Dominguez
Environmental Consultant

cc: JT Terry, Production Foreman - Vanguard
Jim Amos, Environmental Protection Specialist - BLM
File

FIGURES



DWG By: D Dominguez
 May 2015

REVISED:

0 3 6
 Miles

SHEET
 1 of 1

Eddy County, New Mexico
 SE 1/4 of SE 1/4, Sec. 12, T20S, R29E
 N 32° 34' 53.80" W 104° 1' 18.48"
 Elevation: 3,328 feet amsl

Figure 1
 Area Map
 Vanguard
 Water Disposal Line

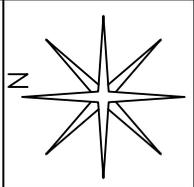


<p>Figure 2 Site Location Map Vanguard Water Disposal Line</p>	<p>Eddy County, New Mexico SE 1/4 of SE 1/4, Sec. 12, T20S, R29E N 32° 34' 53.80" W 104° 1' 18.48" Elevation: 3,328 feet amsl</p>	<p>DWG By: D Dominguez May 2015</p> <p>REVISED:</p> <p>4,000 0 2,000 Feet</p> <p>SHEET 1 of 1</p>
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Release Area
 (~18,500 square feet)

LEGEND

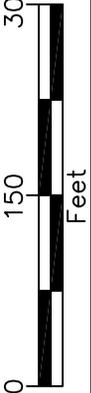


REVISED:
 300 SHEET
 1 of 1

DWG By: D Dominguez
 May 2015

Eddy County, New Mexico
 SE 1/4 of SE 1/4, Sec. 12, T20S, R29E
 N 32° 34' 53.80" W 104° 1' 18.48"
 Elevation: 3,328 feet amsl

Figure 3
 Site Map
 Vanguard
 Water Disposal Line



TABLES

TABLE 1
Well Data

Vanguard - Water Disposal Line

Ref #	Well Number	Use	Diversion ^A	Owner	q64	q16	q4	Sec	Twsp	Rng	Easting	Northing	Date Measured	Surface Elevation ^B	Depth to Water (ft bgs)
1	CP 00740	PRO	3	YATES PETROLEUM CORP.	2	3	3	12	20S	29E	590669	3605509	19-Feb-89	3,329	--
2	CP 00745	PRO	0	YATES PETROLEUM	4	1	3	12	20S	29E	590653	3605782	09-Dec-89	3,329	--
3	CP 00832	PLS	3	SNYDER RANCHES		2	3	12	20S	29E	590971	3605815	--	3,328	--
4	CP 01111	PRO	0	CONCHO OIL AND GAS	4	1	3	12	20S	29E	590653	3605782	09-Dec-89	3,329	--
5	CP 01112	PRO	0	CONCHO OIL & GAS	4	1	3	12	20S	29E	590653	3605782	09-Dec-89	3,329	--
6	CP 01113	PRO	0	BUREAU OF LAND MANAGEMENT	4	1	3	12	20S	29E	590653	3605782	09-Dec-89	3,329	--
7	CP 00834	PLS	3	SNYDER RANCHES		2	3	6	20S	30E	592566	3607436	--	3,225	--

* = Data obtained from the New Mexico Office of the State Engineer Website (http://iwaters.ose.state.nm.us:7001/iWATERS/wr_RegisServlet) and USGS Database

^A = In acre feet per annum

^B = Elevation interpolated from USGS topographical map based on referenced location.

PRO = 72-12-1 Prospecting or development of Natural Resource

PLS = Non 72-12-1 Livestock watering

quarters are 1=NW, 2=NE, 3=SW, 4=SE; quarters are smallest to biggest

-- = Data not provided on the NM iwaters website

ATTACHMENTS

**ATTACHMENT I
PHOTOGRAPHS**



Photograph #1- Northwest view over release area.



Photograph #2- Northerly view over release area.



Photograph #3- Looking north across release area.



Photograph #4- Looking north across release area.

**ATTACHMENT II
INFORMATION AND RANKING
INITIAL C-141**

Information and Ranking		Incident Date: Unknown	NMOCD Notified:
Site: Water Disposal Line		Assigned Site Reference #:	
Company: Vanguard			
Street Address:			
Mailing Address: 4001 Penbrook Suite 201			
City, State, Zip: Odessa, Texas 79762			
Representative: JT Terry			
Representative Telephone: (432) 362 – 2209			
Telephone:			
Fluid volume released (bbls): 10 bbls		Recovered (bbls): 5 bbls	
>25 bbls: Notify NMOCD verbally within 24 hrs and submit form C-141 within 15 days. (Also applies to unauthorized releases >500 mcf Natural Gas)			
5-25 bbls: Submit form C-141 within 15 days (Also applies to unauthorized releases of 50-500 mcf Natural Gas)			
Leak, Spill, or Pit (LSP) Name: Water Disposal Line			
Source of contamination: Polyline			
Land Owner, i.e., BLM, ST, Fee, Other: BLM			
LSP Dimensions:			
LSP Area: ~ 18,500 sq. ft.			
Location of Reference Point (RP):			
Location distance and direction from RP:			
Latitude: N 32° 34' 53.80"			
Longitude: W 104° 1' 18.48"			
Elevation above mean sea level: 3,328 feet			
Feet from Section Line:			
Feet from Section Line:			
Location- Unit or ¼¼: SE¼ of the SE¼		Unit Letter: P	
Location- Section: 12			
Location- Township: T20S			
Location- Range: R29E			
Surface water body within 1000' radius of site: none			
Domestic water wells within 1000' radius of site: none			
Agricultural water wells within 1000' radius of site: none			
Public water supply wells within 1000' radius of site: none			
Depth from land surface to ground water (DG): ~ 40'			
Depth of contamination (DC): unknown			
Depth to ground water (DG – DC = DtGW): ~ 40'			
1. Ground Water		2. Wellhead Protection Area	
If Depth to GW <50 feet: <i>20 points</i>		If <1000' from water source, or; <200' from private domestic water source: <i>20 points</i>	
If Depth to GW 50 to 99 feet: <i>10 points</i>		If >1000' from water source, or; >200' from private domestic water source: <i>0 points</i>	
If Depth to GW >100 feet: <i>0 points</i>			
<i>Site Rank (1+2+3) = 20 + 0 + 0 = 20</i>			
Total Site Ranking Score and Acceptable Concentrations			
Parameter	>19	10-19	0-9
Benzene ¹	10 ppm	10 ppm	10 ppm
BTEX ¹	50 ppm	50 ppm	50 ppm
TPH	100 ppm	1,000 ppm	5,000 ppm
Chloride	250 ppm	500 ppm	1,000 ppm
¹ 100 ppm field VOC headspace measurement may be substituted for lab analysis			

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 August 8, 2011

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

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company: Vanguard	Contact: JT Terry
Address: 4001 Penbrook, Suite 201, Odessa, Texas 79762	Telephone No. 432-362-2209
Facility Name: Water Disposal Line	Facility Type: polyline

Surface Owner: Federal	Mineral Owner: Federal	API No.
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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
P	12	20S	29E					Eddy

Latitude: N 32.581612° Longitude: W 104.021801°

NATURE OF RELEASE

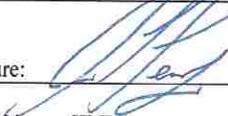
Type of Release: produced water	Volume of Release: 10 bbls	Volume Recovered: 5 bbls
Source of Release: disposal line	Date and Hour of Occurrence: unknown	Date and Hour of Discovery: unknown
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour:	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse: Not Applicable	

If a Watercourse was Impacted, Describe Fully.* Not Applicable

Describe Cause of Problem and Remedial Action Taken.*
The poly disposal line failed due to vehicle traffic. The line was repaired and moved.

Describe Area Affected and Cleanup Action Taken.* The spill impacted approximately 18,500 sq. ft. of lease road. A vacuum truck was brought in and picked up approximately 5 bbls of water. The area will be remediated in accordance to the NMOCD and BLM guidelines for spill remediation.

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: 	<u>OIL CONSERVATION DIVISION</u>	
Printed Name: JT Terry	Approved by Environmental Specialist:	
Title: Production Foreman	Approval Date:	Expiration Date:
E-mail Address: jterry@vnrlc.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: Phone: 432-362-2209		

* Attach Additional Sheets If Necessary