



MARK L. SHIDLER, INC.
PETROLEUM EXPLORATION AND PRODUCTION

April 25, 2019

State of New Mexico
Energy, Minerals and Natural Res. Div.
Oil Conservation Division
1625 N. French Dr.
Hobbs, NM 88240

Re: State 23-1, (30-025-20419)
M-23-T14S-R34W
Lea Co., NM

C-141

Gentlemen:

Pursuant to that certain letter dated April 4, 2019, please find attached the C-141 Remediation Plan dated April 25, 2018 together with a color photocopy of the Aerial Photographic Image of the Production Facility for the above Re well. The same is submitted for your review and further handling.

In the coming days, MARK L. SHIDLER, INC. ("MLSI") will: 1) obtain sampling equipment necessary for acquisition of twelve (12) soil samples from six (6) locations/site (perhaps more to fully delineate the contamination) following standard handling and transportation protocol; 2) have the same analyzed (THP, Chlorides & BTEX) by an accredited laboratory; 3) review laboratory results and create excavation plan; and, 4) removal of the contaminated soil volume to an authorized landfill.

Please note the table on the aforementioned aerial photograph which sets out the possible area and volume of contamination (which is contained inside the firewall/berm).

You are welcome to contact the undersigned by email at ggregson@marklshidlerinc.com or by telephone at (713) 481-6487.

Very truly yours,
MARK L. SHIDLER, INC.

Gregory B. Gregson
Operations Manager

GBG

Encl.

Mark L. Shidler, Inc.

State 23-1 - 30-035-20419
 High Plains Permo Penn Field
 Lea Co., NM

Aerial Photographic Image of
 Production Facility



Legend

Approximate Release Surface Area
 20" X 50" = 1,000 SqFt.
 Est. Vol.: 500 - 1,500 Ft.³

Sample Number	Lat.	Long.	Sample Depth	Remarks
1A	33.086056	103.486206	6"	
B			TBD	Depth of Investigation may exceed 1'
2A	33.086014	103.486186	6"	Depth of Investigation may exceed 1'
B			TBD	Depth of Investigation may exceed 1'
3A	33.086039	103.486092	6"	Depth of Investigation may exceed 1'
B			TBD	Depth of Investigation may exceed 1'
4A	33.086006	103.486103	6"	Depth of Investigation may exceed 1'
B			TBD	Depth of Investigation may exceed 1'
5A	33.086011	103.486083	6"	Depth of Investigation may exceed 1'
B			TBD	Depth of Investigation may exceed 1'
6A	33.086006	103.485975	6"	Depth of Investigation may exceed 1'
B			TBD	Depth of Investigation may exceed 1'

50 ft



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

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

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

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party Mark L. Shidler, Inc.	OGRID 014096
Contact Name G. B. Gregson	Contact Telephone (713) 481-6487
Contact email ggregson@marklshidlerinc.com	Incident # (assigned by OCD)
Contact mailing address 1313 Campbell Road, Bldg. D, Houston, Texas 77007	

Location of Release Source

Latitude 33.086053

Longitude 103.486117

(NAD 83 in decimal degrees to 5 decimal places)

Site Name State 23-1	Site Type Production Facility
Date Release Discovered January 17, 2019	API# (if applicable) 30-025-20419

Unit Letter	Section	Township	Range	County
M	23	14S	34E	Lea

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) 30	Volume Recovered (bbls) 17
<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 2" valve rupture at BSW&W line at oil stock tank & faulty 2", "T" at heater-treater.

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Was this a major release as defined by 19.15.29.7(A) NMAC? X Yes No	If YES, for what reason(s) does the responsible party consider this a major release? 19.15.29.7(1)
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? No immediate notice was provided. Copy of NMAC 19.15.29.10 was provided to contract pumper.	

Initial Response

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

X The source of the release has been stopped. X The impacted area has been secured to protect human health and the environment. X Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. X All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> 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: G.B. Gregson	Title: Operations Manager
Signature: _____	Date: April 3, 2019
email: ggregson@marklshidlerinc.com	Telephone: (713) 481-6487
<u>OCD Only</u>	
Received by: _____	Date: _____

State of New Mexico
Oil Conservation Division

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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?	<u>60</u> (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 not on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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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.

Characterization Report Checklist: Each of the following items must be included in the report.

- Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- Field data
- Data table of soil contaminant concentration data
- Depth to water determination
- Determination of water sources and significant watercourses within 1/2-mile of the lateral extents of the release
- Boring or excavation logs
- Photographs including date and GIS information
- Topographic/Aerial maps
- Laboratory data including chain of custody

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.

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Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

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Remediation Plan

Remediation Plan Checklist: *Each of the following items must be included in the plan.*

- Detailed description of proposed remediation technique
- Scaled sitemap with GPS coordinates showing delineation points
- Estimated volume of material to be remediated
- Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- Extents of contamination must be fully delineated.
- Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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: Gregory B. Gregson

Title: Operations Manager

Signature: 

Date: April 25, 2019

email: ggregson@marklshidlerinc.com

Telephone: (713) 481-6487

OCD Only

Received by: _____ Date: _____

- Approved
 Approved with Attached Conditions of Approval
 Denied
 Deferral Approved

Signature: _____

Date: _____

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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.

Printed Name: _____ Title: _____
 Signature: _____ Date: _____
 email: _____ Telephone: _____

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: _____



New Mexico Office of the State Engineer

Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

(R=POD has been replaced, O=orphaned, C=the file is closed) (quarters are 1=NW 2=NE 3=SW 4=SE) (quarters are smallest to largest) (NAD83 UTM in meters) (In feet)

POD Number	POD Sub-Code			basin			County			X	Y	Depth Well	Depth Water	Water Column
	64	16	4	Sec	Tws	Rng	64	16	4					
L 05054	L	LE		23	14S	34E	641725	3662288*			105	90	15	
L 09357	L	LE	4 3 1	23	14S	34E	641112	3662487			140	60	80	

Average Depth to Water: **75 feet**
 Minimum Depth: **60 feet**
 Maximum Depth: **90 feet**

Record Count: 2

PLSS Search:

Section(s): 23 Township: 14S Range: 34E

*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.