

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	NCS 14/0755727
District RP	
Facility ID	
Application ID	

Release Notification

NMOCD

NOV 05 2018

Responsible Party

DISTRICT III

Responsible Party: BP America Production Co.	OGRID: 778	Subsequent Report: SVE
Contact Name: Steve Moskal	Contact Telephone: (505) 330-9179	
Contact email: steven.moskal@bpx.com	Incident # (assigned by OCD)	
Contact mailing address: 380 Airport Road, Durango CO, 81303		

Location of Release Source

Latitude: 36.84507° Longitude: -107.81637°
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Florance Gas Com J 016	Site Type: Natural Gas Production Well Pad
Date Release Discovered: March 10, 2014	API#: 30-045-09800

Unit Letter	Section	Township	Range	County
A	6	T30N	R09W	San Juan

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 type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<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 checked="" type="checkbox"/> Condensate	Volume Released (bbls): Unknown	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:

The vertical and lateral extents of the impacted soil were identified via a soil boring investigation. Soil vapor extraction points were installed and the system became operation on February 2016. Attached is the field data documenting the SVE system performance. The depth of the impacts will prolong the operation of the system, but appears to be effective in reducing the contaminant concentration thus far. Attached is SVE operation data through October 2018.

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Smith, Cory, EMNRD

From: Smith, Cory, EMNRD
Sent: Wednesday, November 14, 2018 8:59 AM
To: Steven Moskal - BP America (steven.moskal@BPX.com)
Cc: Fields, Vanessa, EMNRD
Subject: Florance Gas Com J #16 Incident# NCS1410755727

Steve,

OCD has received the SVE update report on November 5, 2018 and has approved it with the following conditions of approval

- Continue Operating SVE and Reporting as previously directed.

Also for all future submittals this incident was assigned Incident# NCS1410755727 please make sure you include this in any future communication or submittals

Thanks,

Cory Smith
Environmental Specialist
Oil Conservation Division
Energy, Minerals, & Natural Resources
1000 Rio Brazos, Aztec, NM 87410
(505)334-6178 ext 115
cory.smith@state.nm.us

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Was this a major release as defined by 19.15.29.7(A) NMAC? <input type="checkbox"/> Yes <input checked="" 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)?	

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 <u>not</u> been undertaken, explain why: The released water absorbed into the ground surface.
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: _____ Title: _____ Signature: _____ Date: _____ email: _____ Telephone: _____
<u>OCD Only</u> Received by: _____ Date: _____

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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?	304 (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

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.

State of New Mexico
Oil Conservation Division

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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: _____ 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)
- Continued Remediation operation and performance data

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.

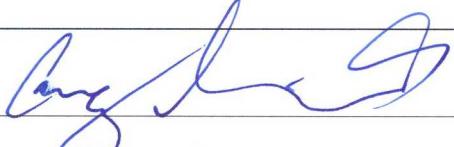
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public 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: Steve Moskal Title: Environmental Coordinator

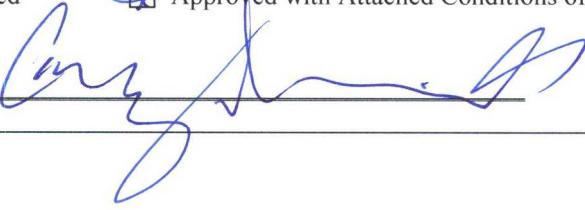
Signature:  Date: October 31, 2018

email: steven.moskal@bpx.com Telephone: 505-330-9179

OCD Only

Received by:  Date: 11/5/18

- Approved
- Approved with Attached Conditions of Approval
- Denied
- Deferral Approved

Signature:  Date: 11/14/18

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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: _____

Florance Gas Com J 016

SVE Operation and Performance Oct.2018
AP# 30-045-09800
(A), S6, T30N, R09W
SVE GPS:
36.845032°, -107.815454°

Legend

- Florance GC J 016A Wellhead
- SVE Point
- ◆ SVE Unit

Florance Gas Com J 016
SVE Unit

BH-3 BH-5
BH-1
BH-4 BH-2



BP America - Florance GC J 16

Summary SVE System Monitoring Data

Date	SVE Pt.	Exhaust OVM (ppm)	Exhaust Vacuum (in)	Exhaust Rate (cfm)	System Operational at Time of Arrival?	H ₂ O Drained from drum?	H ₂ O Amt. Drained (Gal.)?	Comments
2/17/2016	BH-1	4,088	33	NA	-	-	-	Initial start up at SVE BH-1
2/18/2016	BH-1	1,844	34	NA	YES	NO	0.00	Water in drum below drain port
2/19/2016	BH-1	1,280	31	NA	YES	YES	1.50	
2/20/2016	BH-1	1,273	31	NA	YES	YES	2.50	
2/22/2016	BH-1	1,193	31	NA	YES	YES	9.00	
2/26/2016	BH-1	1,344	34	NA	YES	YES	23.00	
3/3/2016	BH-1	1,259	34	NA	YES	YES	15.50	
3/8/2016	BH-1	1,219	32	NA	YES	YES	11.50	
3/10/2016	BH-1	1,135	34	NA	YES	YES	5.00	
3/14/2016	BH-1	1,184	34	NA	YES	YES	10.50	
3/17/2016	BH-1	1,022	37	NA	YES	YES	7.50	
3/22/2016	BH-1	2,427	36	NA	YES	YES	9.00	
3/24/2016	BH-1	1,504	34	NA	YES	YES	5.50	
3/28/2016	BH-1	1,448	34	NA	YES	YES	17.00	
3/31/2016	BH-1	1,462	34	NA	YES	YES	9.00	
4/5/2016	BH-1	1,480	34	NA	YES	YES	12.00	
4/8/2016	BH-1	1,499	34	NA	YES	YES	5.00	
4/11/2016	BH-1	1,425	34	NA	YES	YES	7.50	
4/15/2016	BH-1	1,567	34	NA	YES	YES	10.50	
4/19/2016	BH-1	1,596	34	NA	YES	YES	11.50	
4/22/2016	BH-1	1,480	34	NA	YES	YES	3.00	
4/25/2016	BH-1	1,471	34	NA	YES	NO	0.00	Measured ~ 2.5" H2O in drum
4/29/2016	BH-1	1,434	34	NA	YES	YES	11.50	
5/5/2016	BH-1	1,753	33	NA	YES	YES	11.50	
5/14/2016	BH-1	1,407	34	NA	YES	YES	10.50	
5/20/2016	BH-1	1,190	33	NA	YES	YES	5.50	
5/26/2016	BH-1	1,303	34	NA	YES	NO	0.00	Measured ~ 1.5" H2O in drum
6/2/2016	BH-1	1,167	33	NA	YES	NO	0.00	Measured ~ 3.5" H2O in drum
6/17/2016	BH-1	1,122	33	NA	YES	NO	0.00	Measured ~ 1.0" H2O in drum
6/30/2016	BH-1	926	33	NA	YES	NO	0.00	Dry drum
7/15/2016	BH-1	938	33	NA	YES	NO	0.00	Dry drum
8/19/2016	BH-1	804	34	NA	YES	NO	0.00	Water in drum below drain port
9/26/2016	BH-1	878	35	NA	YES	YES	17.00	
10/25/2016	BH-1	616	34	NA	YES	YES	24.00	

BP America - Florance GC J 16

Summary SVE System Monitoring Data

Date	SVE Pt.	Exhaust OVM (ppm)	Exhaust Vacuum (in)	Exhaust Rate (cfm)	System Operational at Time of Arrival?	H ₂ O Drained from drum?	H ₂ O Amt. Drained (Gal.)?	Comments
11/8/2016	BH-1	-	-	NA	NO	YES	27.00	Collected readings after draining & restarting, commenced using Mini Rae PID
11/16/2016	BH-1	1,216	38	NA	YES	YES	24.00	
11/28/2016	BH-1	-	-	NA	YES	YES	?	Drained H2O, water level not measured
12/6/2016	BH-1	-	-	NA	YES	YES	?	Drained H2O, water level not measured
12/9/2016	BH-1	1,189	37	NA	YES	YES	10.00	
12/12/2016	BH-1	-	-	NA	YES	YES	?	Drained H2O, water level not measured
12/15/2016	BH-1	758	37	NA	YES	YES	11.50	
12/19/2017	BH-1	1,695	35	NA	YES	YES	20.50	
12/28/2017	BH-1	1,549	32	NA	NO	YES	28.00	Collected readings after draining & restarting
12/31/2016	BH-1	1,365	32	NA	YES	YES	24.00	
1/4/2017	BH-1	1,299	32	NA	YES	YES	19.00	
1/9/2017	BH-1	-	-	NA	YES	YES	?	Drained H2O, water level not measured
1/14/2017	BH-1	1,781	32	NA	YES	YES	19.50	
1/20/2017	BH-1	1782	32	NA	YES	YES	22.00	
1/28/2017	BH-1	1582	-	NA	NO	YES	12.00	Collected readings after thawing & restarting
1/29/2017	BH-1	-	-	NA	YES	YES	?	Replaced broken pvc nipple for drain plug then drained & restarted
1/31/2017	BH-1	-	-	NA	YES	YES	9.00	
2/3/2017	BH-1	1,516	24	NA	YES	YES	11.50	
2/9/2017	BH-1	1,775	25	NA	YES	YES	22.00	
2/14/2017	BH-1	-	-	NA	YES	YES	?	Drained H2O, water level not measured
2/16/2017	BH-1	1,502	25	NA	YES	YES	6.50	
2/21/2017	BH-1	1,641	26	NA	YES	YES	14.00	
3/3/2017	BH-1	-	-	NA	NO	NO	-	Ice in drum below drain plug, restarted
3/10/2017	BH-1	1,524	22	NA	YES	YES	22.00	
3/16/2017	BH-1	1,566	22	NA	YES	YES	9.00	
3/21/2017	BH-1	-	-	NA	YES	YES	?	Drained H2O, water level not measured
3/29/2017	BH-1	1,525	22	NA	YES	YES	23.50	
4/5/2017	BH-1	1,560	22	NA	YES	YES	19.00	
4/13/2017	BH-1	1,495	22	NA	YES	YES	12.00	
4/26/2017	BH-1	2,132	21	NA	YES	YES	9.00	
5/8/2017	BH-1	-	-	NA	YES	YES	15.50	
5/12/2017	BH-1	1,266	20	NA	YES	YES	4.00	
5/24/2017	BH-1	1,811	20	NA	YES	YES	12.00	
6/12/2017	BH-1	1,946	19	NA	YES	NO	0.00	Water in drum below drain port
7/11/2017	BH-1	1,429	20	NA	YES	NO	0.00	Dry drum
8/14/2017	BH-1	887	20	NA	YES	NO	0.00	Dry drum

BP America - Florance GC J 16

Summary SVE System Monitoring Data

Date	SVE Pt.	Exhaust OVM (ppm)	Exhaust Vacuum (in)	Exhaust Rate (cfm)	System Operational at Time of Arrival?	H ₂ O Drained from drum?	H ₂ O Amt. Drained (Gal.)?	Comments
9/12/2017	BH-1	1,578	21	NA	YES	NO	0.00	Dry drum
10/13/2017	BH-1	1,969	20	NA	NO	YES	3.00	Switch was on "ON" position at time of arrival. Drained then restarted.
10/25/2017	BH-1	808	20	NA	YES	YES	22.00	
11/1/2017	BH-1	-	-	NA	YES	YES	14.00	
11/21/2017	BH-1	1,913	20	NA	NO	NO	0.00	Water in drum below drain port, restarted, then collected data
11/29/2017	BH-1	1,120	38	NA	YES	YES	16.50	
12/8/2017	BH-1	796	20	NA	NO	YES	26.00	Drained water in drum, restarted, then collected data
12/15/2017	BH-1	715	22	NA	NO	YES	19.00	Drained water in drum, restarted, then collected data
12/20/2017	BH-1	741	22	NA	YES	YES	25.50	
12/26/2018	BH-1	820	21	NA	YES	YES	24.50	
12/30/2017	BH-1	929	21	NA	YES	YES	15.50	
1/5/2018	BH-1	1,171	20	NA	YES	YES	25.50	
1/10/2018	BH-1	986	21	NA	YES	YES	17.00	
1/15/2018	BH-1	630	20	NA	YES	YES	20.50	
1/20/2018	BH-1	760	20	NA	YES	YES	19.50	
1/25/2018	BH-1	523	19	NA	YES	YES	25.50	
1/30/2018	BH-1	NA	20	NA	YES	YES	20.50	
2/12/2018	BH-1	404	16	NA	NO	NO	0.00	Water in drum below drain port, restarted, then collected data
2/21/2018	BH-1	543	17	NA	NO	NO	0.00	Water in drum below drain port, restarted, then collected data
3/3/2018	BH-1	729	8	NA	NO	NO	0.00	Water in drum below drain port, restarted, then collected data
3/16/2018	BH-1	700	8	NA	NO	NO	0.00	Water in drum below drain port, restarted, then collected data
3/28/2018	BH-1	1,341	9	NA	NO	YES	?	Drained H ₂ O, water level not measured, shut down w/in 6 hrs. of arrival
4/12/2018	BH-1	436	9	NA	YES	YES	19.00	
4/28/2018	BH-1	812	9	NA	YES	YES	18.00	
5/14/2018	BH-1	756	8	NA	YES	NO	0.00	Water in drum below drain port
6/21/2018	BH-1	864	8	NA	YES	NO	0.00	Did not drain drum
7/26/2018	BH-1	273	8	NA	YES	NO	0.00	Water level not measured
8/30/2018	BH-1	379	8	NA	YES	NO	0.00	Water in drum below drain port
9/27/2018	BH-1	359	10	NA	NO	YES	2.50	Water in drum below drain port, restarted, then collected data
10/24/2018	BH-1	632	8	NA	YES	YES	19.00	

Florance Gas Com 016 SVE/BH1 Performance

