

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	NCS1725739883
District RP	
Facility ID	
Application ID	

## Release Notification

NMOC

NOV 05 2018

DISTRICT III

### Responsible Party

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: 36.865369° Longitude: -108.001206°  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Heaton LS 005	Site Type: Natural Gas Production Well Pad
Date Release Discovered: 2013	API#: 30-045-10251

Unit Letter	Section	Township	Range	County
M	28	T31N	R11W	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 March 2015. Attached is the field data documenting performance of the SVE system. A theft of the entire SVE system occurred in November of 2017. The system was replaced and restarted in August of 2018. The SVE continues to appear effective in reducing the contaminant concentration thus far. Attached is the operation data through October 2018.

## Smith, Cory, EMNRD

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**From:** Smith, Cory, EMNRD  
**Sent:** Thursday, November 15, 2018 8:31 AM  
**To:** Steven Moskal - BP America (steven.moskal@BPX.com)  
**Cc:** Fields, Vanessa, EMNRD  
**Subject:** Heaton LS #5 Incident# nCS1725739883

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# nCS1725739883 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](mailto: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: _____
<b><u>OCD Only</u></b>  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 <b>not</b> 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 ½-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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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.

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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: 11/15/18

- Approved     
 Approved with Attached Conditions of Approval     
 Denied     
 Deferral Approved

Signature: OCD Date: 11/15/18

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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: \_\_\_\_\_

# Heaton LS 005

SVE Operation and Performance Oct.2018  
API# 30-045-10251  
(M), S28, T31N, R11W  
SVE GPS:  
36.865510°, -108.001121°

**Legend**

- Heaton LS 005 Wellhead
- SVE Point
- ◆ SVE Unit



SVE Unit

BH-2

BH-6

BH-1

BH-4

BH-5

BH-3 (P&A)

Heaton LS 005

Google Earth

© 2018 Google

100 ft



# BP America - Heaton LS 5

## Summary SVE System Monitoring Data

Date	SVE Pt.	Exhaust OVM (ppm)	Exhaust Vacuum (in)	Exhaust Rate (cfm)	System Operational at Time of Arrival?	H <sub>2</sub> O Drained from drum?	H <sub>2</sub> O Amt. Drained (Gal.)?	Comments
3/9/2015	BH-1	562	30	65	-	-	-	Initial vac startup on SVE - BH1.
3/10/2015	BH-1	425	30	65	YES	NO		
3/11/2015	BH-1	490	30	60	YES	NO		
3/12/2015	BH-1	549	32	50	YES	NO		
3/13/2015	BH-1	641	31	60	YES	NO		
3/16/2015	BH-1	792	31	60	YES	NO		
3/18/2015	BH-1	751	33	60	YES	NO		
3/19/2015	BH-1	801	33	60	YES	NO		
3/23/2015	BH-1	823	34	50	YES	NO		
3/30/2015	BH-1	859	34	60	YES	NO		
4/1/2015	BH-1	910	34	60	YES	NO		
4/6/2015	BH-1	917	34	50	YES	NO		
4/15/2015	BH-1	907	36	50	YES	NO		
4/20/2015	BH-1	847	34	60	YES	NO		
4/27/2015	BH-1	832	35	50	YES	NO		
5/7/2015	BH-1	849	36	50	YES	NO		
5/11/2015	BH-1	824	36	60	YES	NO		
5/20/2015	BH-1	877	38	50	YES	NO		
5/26/2015	BH-1	717	36	50	YES	NO		
6/4/2015	BH-1	829	36	50	YES	NO		
6/8/2015	BH-1	808	36	50	YES	NO		
6/15/2015	BH-1	690	38	50	NO	NO		Collected readings after restarting
6/22/2015	BH-1	724	38	50	YES	NO		
6/29/2015	BH-1	665	36	50	YES	NO		
7/6/2015	BH-1	661	36	50	YES	NO		
7/13/2015	BH-1	690	36	50	YES	NO		
7/20/2015	BH-1	702	36	50	YES	NO		
7/27/2015	BH-1	650	36	50	YES	NO		
8/5/2015	BH-1	685	38	50	YES	NO		
8/12/2015	BH-1	599	38	50	YES	NO		
8/19/2015	BH-1	688	38	50	YES	NO		
8/24/2015	BH-1	655.0	38	50	YES	NO		
8/24/2015	BH-1	663.0	38	50	YES	NO		
9/8/2015	BH-1	690.0	38	50	YES	NO		

# BP America - Heaton LS 5

## Summary SVE System Monitoring Data

Date	SVE Pt.	Exhaust OVM (ppm)	Exhaust Vacuum (in)	Exhaust Rate (cfm)	System Operational at Time of Arrival?	H <sub>2</sub> O Drained from drum?	H <sub>2</sub> O Amt. Drained (Gal.)?	Comments
9/17/2015	BH-1	654.0	38	50	YES	NO		Dry drum
9/22/2015	BH-1	950	36	50	YES	NO		Dry drum, switched to SVE-BH2
9/23/2015	BH-2	335	38	50	YES	NO		Dry drum, switched to SVE-BH4
9/24/2015	BH-4	1,023	39	50	YES	NO		Dry drum, switched to SVE-BH5
9/25/2015	BH-5	472	40	50	YES	NO		Dry drum, switched to SVE-BH6
9/28/2015	BH-6	600	40	50	YES	NO		Dry drum, switched to SVE-BH4
9/29/2015	BH-4	751	39	50	YES	NO		Dry drum
10/8/2015	BH-4	719	40	50	YES	NO		Did not check water level in drum
10/15/2015	BH-4	865	40	50	YES	NO		Did not check water level in drum
10/23/2015	BH-4	806	40	50	YES	NO		Dry drum
10/28/2015	BH-4	1,148	40	50	YES	NO		Did not check water level in drum
11/6/2015	BH-4	1,053	40	50	YES	NO	0.00	Measured ~ 1.5" H2O in drum
11/13/2015	BH-4	1102	40	50	YES	NO		Did not check water level in drum
11/20/2015	BH-4	1094	40	50	YES	YES	3.00	
11/27/2015	BH-4	1232	40	50	YES	NO		Did not check water level in drum
12/4/2015	BH-4	1339	40	50	YES	NO		Did not check water level in drum
12/11/2015	BH-4	1337	40	50	YES	NO	0.00	Measured ~ 4.5" H2O in drum
12/18/2015	BH-4	1,310	40	50	YES	YES	11.50	
12/24/2015	BH-4	1,620	40	60	YES	NO		Did not check water level in drum
12/31/2015	BH-4	1,407	40	60	YES	NO		Did not check water level in drum
1/7/2016	BH-4	1,260	40	50	YES	NO		Did not check water level in drum
1/14/2016	BH-4	1,337	40	50	YES	YES	17.00	
1/21/2016	BH-4	1,388	42	NA	YES	NO		Did not check water level in drum
1/29/2016	BH-4	1,206	42	NA	YES	NO		Did not check water level in drum
2/5/2016	BH-4	1,301	42	NA	YES	YES	24.00	
2/13/2016	BH-4	1,062	42	60	YES	NO		Did not check water level in drum
2/19/2016	BH-4	1,005	40	60	YES	NO	0.00	Measured ~ 8.5" H2O in drum
2/26/2016	BH-4	909	40	70	YES	YES	16.50	
3/3/2016	BH-4	988	40	60	YES	NO		Did not check water level in drum
3/10/2016	BH-4	879	40	60	YES	NO	0.00	Measured ~ 8.5" H2O in drum
3/17/2016	BH-4	1,133	40	NA	YES	YES	5.50	
3/24/2016	BH-4	1,155	41	NA	YES	NO	0.00	Measured ~ 1.0" H2O in drum
3/31/2016	BH-4	1,086	40	NA	YES	YES	4.00	Drained ~ 4 gal., restarted
4/8/2016	BH-4	920	40	NA	YES	NO	0.00	Measured ~ 1.0" H2O in drum
4/15/2016	BH-4	914	40	NA	YES	NO	0.00	Measured ~ 1.5" H2O in drum
4/22/2016	BH-4	837	40	NA	YES	NO	0.00	Measured ~ 2.5" H2O in drum

# BP America - Heaton LS 5

## Summary SVE System Monitoring Data

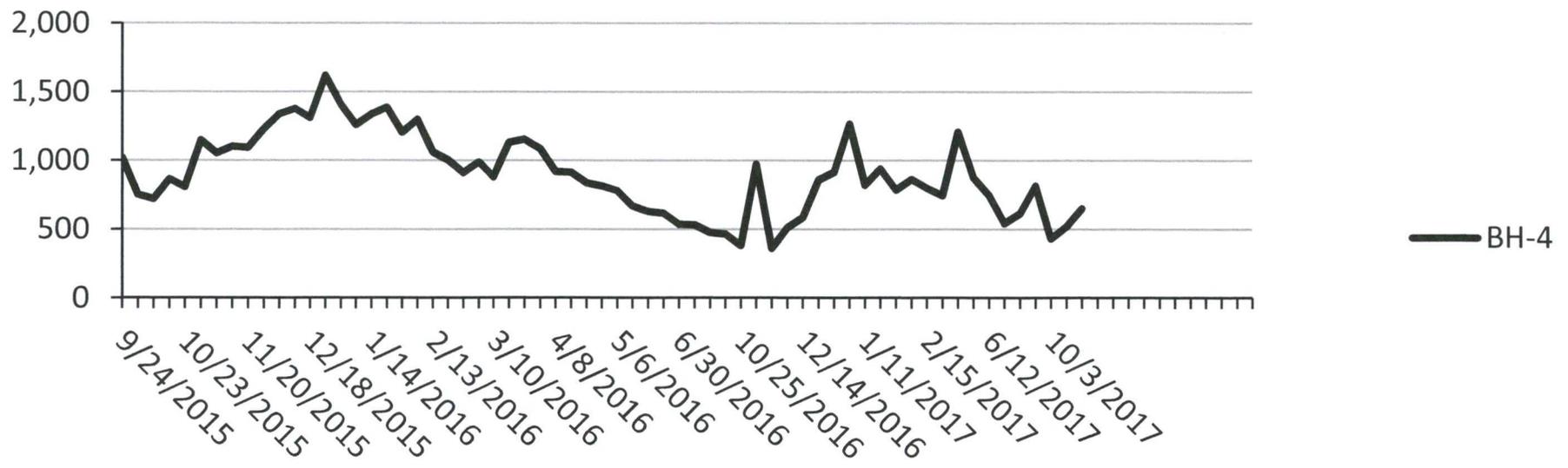
Date	SVE Pt.	Exhaust OVM (ppm)	Exhaust Vacuum (in)	Exhaust Rate (cfm)	System Operational at Time of Arrival?	H <sub>2</sub> O Drained from drum?	H <sub>2</sub> O Amt. Drained (Gal.)?	Comments
4/29/2016	BH-4	815	40	NA	YES	NO	0.00	Measured ~ 3.0" H2O in drum
5/6/2016	BH-4	780	40	NA	YES	YES	6.50	
5/19/2016	BH-4	669	40	NA	YES	NO		Did not check water level in drum
6/3/2016	BH-4	629	40	NA	YES	NO		Water in drum below drain port
6/16/2016	BH-4	616	38	NA	YES	NO		Dry drum
6/30/2016	BH-4	535	37	70	YES	NO		Dry drum
7/14/2016	BH-4	531	36	50	YES	NO		Dry drum
8/19/2016	BH-4	474	38	NA	YES	NO		Dry drum
9/26/2016	BH-4	464	40	40	YES	YES	7.50	
10/25/2016	BH-4	379	38	NA	YES	YES	7.50	
11/8/2016	BH-4	-	-	NA	YES	YES	23.00	
11/21/2016	BH-4	975	38	NA	NO	YES	27.00	Collected readings after draining & restarting, commenced using Mini Rae PID
11/29/2016	BH-4	360	36	NA	YES	YES	25.50	
12/6/2016	BH-4	511	37	NA	YES	YES	24.00	
12/14/2016	BH-4	584	37	NA	NO	YES	27.00	Collected readings after draining & restarting
12/20/2016	BH-4	860	38	NA	YES	YES	19.00	
12/27/2016	BH-4	916	34	NA	YES	YES	22.00	
1/5/2017	BH-4	1,268	38	NA	YES	NO	27.00	Collected readings after draining & restarting
1/11/2017	BH-4	821	37	NA	YES	YES	17.00	
1/19/2017	BH-4	-	38	NA	YES	YES	19.00	
1/25/2017	BH-4	941	38	NA	YES	YES	17.00	
2/2/2017	BH-4	784	37	NA	YES	YES	24.50	
2/9/2017	BH-4	863	38	NA	YES	YES	15.50	
2/15/2017	BH-4	799	37	NA	YES	YES	10.50	
2/22/2017	BH-4	744	36	NA	YES	YES	12.00	
3/3/2017	BH-4	757	37	NA	YES	YES	18.00	
3/9/2017	BH-4	860	37	NA	YES	YES	11.50	
3/15/2017	BH-4	1,526	36	NA	YES	YES	6.50	
3/29/2017	BH-4	850	36	NA	YES	YES	6.50	
4/13/2017	BH-4	954	36	NA	YES	YES	15.50	
4/25/2017	BH-4	1,210	35	NA	YES	YES	3.00	
5/12/2017	BH-4	875	35	NA	YES	YES	7.00	
6/12/2017	BH-4	745	35	NA	YES	NO	0.00	Water in drum below drain port
7/11/2017	BH-4	541	32	NA	YES	NO	0.00	Dry drum
8/14/2017	BH-4	615	35	NA	YES	NO	0.00	Dry drum
9/15/2017	BH-4	816	32	NA	YES	NO	0.00	Dry drum

## BP America - Heaton LS 5

### Summary SVE System Monitoring Data

Date	SVE Pt.	Exhaust OVM (ppm)	Exhaust Vacuum (in)	Exhaust Rate (cfm)	System Operational at Time of Arrival?	H <sub>2</sub> O Drained from drum?	H <sub>2</sub> O Amt. Drained (Gal.)?	Comments
10/3/2017	BH-4	431	34	NA	YES	YES	26.00	
10/27/2017	BH-4	520	34	NA	YES	YES	22.00	
11/10/2017	BH-4	651	34	NA	YES	YES	26.00	
11/22/2017	Blower unit & electrical box stolen; collected photos, reported to BP							
8/29/2018	1 & 5	617	52	NA	YES	NO	0.00	Restarted 8/27/2018. Water level in drum not measured
9/24/2018								Not operational at time of arrival
9/27/2018	1 & 5	1,167	50	NA	YES	NO	0.00	Water in drum below drain port
10/24/2018	BH-5	700	54	NA	YES	NO	0.00	Water in drum below drain port

# Heaton LS 005 BH-4- SVE Performance



# Heaton LS 005 BH1&BH5-SVE Performance

