



26 April 2016

Mr. Jaime Keyes
Environmental Specialist
NMOCD
1625 N. French Drive
Hobbs, New Mexico 88240

**Re: Initial C-141
Legacy, L.P.
JM Denton A #2
UL-O, Section 11, Township 15 South, Range 37 East
Lea County, New Mexico**

Mr. Keyes:

Environmental Plus, Inc. (EPI), on behalf of Mr. Manuel Soriano, Legacy, L.P., submits the attached form C-141 for the above-referenced leak site, located on land owned by Darr Angell.

The site is located approximately 11 miles northeast of Lovington, 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 twenty-two (22) 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 55 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 the transfer pump quit. Approximately 40 bbls of oil and produced water were released with approximately 35 bbls picked up by vacuum trucks (reference *Figure 3* and attached photographs). Based on available information, the projected distance between impacted soil and groundwater is approximately 55 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	1,000 parts per million
Chloride	500 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. Manuel Soriano at (432) 269-8806 or via e-mail at jsoriano@legacylp.com. All official communication should be addressed to:

Mr. Manuel Soriano
Legacy, L.P.
P.O. Box 10848
Midland, Texas 79702

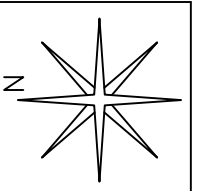
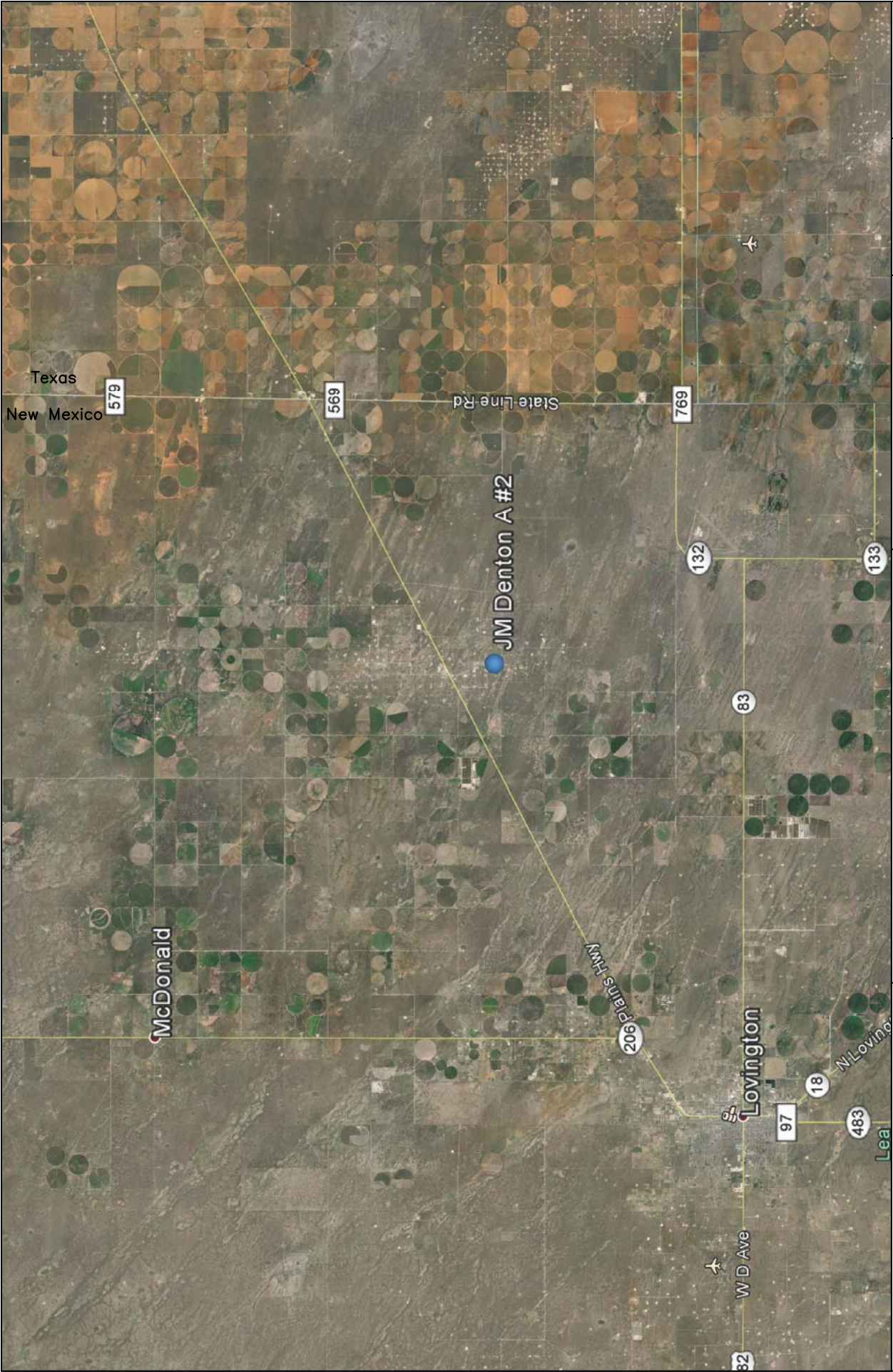
Sincerely,

ENVIRONMENTAL PLUS, INC.

Daniel Dominguez
Environmental Consultant

cc: Manuel Soriano, Production Foreman – Legacy, L.P.
File

FIGURES



REVISED:

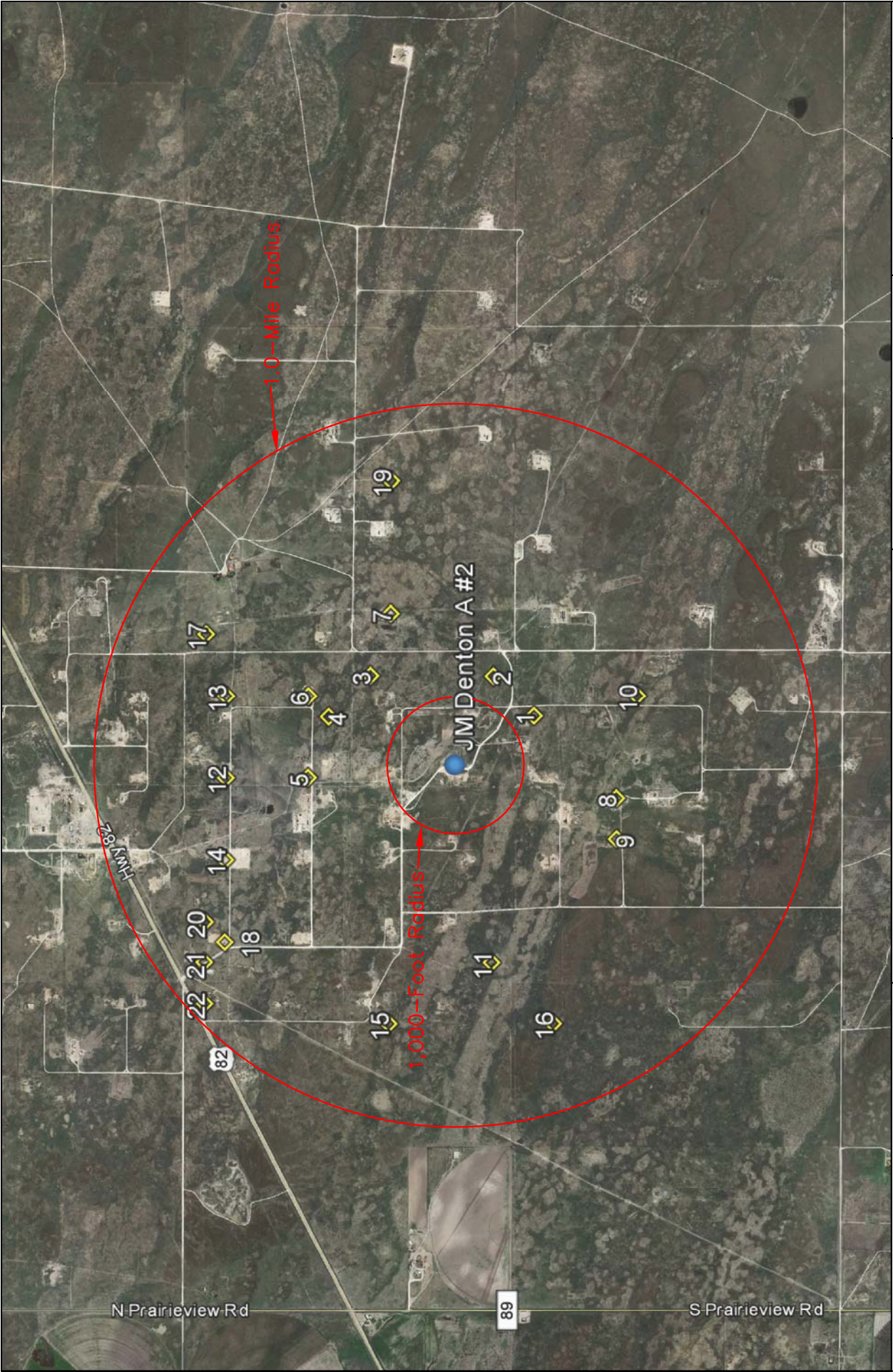
DWG By: D Dominguez
April 2016

0 3 6 Miles

SHEET
1 of 1

Lea County, New Mexico
SW 1/4 of SE 1/4, Sec. 11, T15S, R37E
N 33° 1' 38.08" W 103° 10' 5.05"
Elevation: 3,796 feet amsl

Figure 1
Area Map
Legacy, L.P.
JM Denton A #2



<p>Figure 2 Site Location Map Legacy, L.P. JM Denton A #2</p>	<p>Lea County, New Mexico SW 1/4 of SE 1/4, Sec. 11, T15S, R37E N 33° 1' 38.08" W 103° 10' 5.05" Elevation: 3,796 feet amsl</p>		<p>REVISED:</p>	
	<p>DWG By: D Dominguez April 2016</p>	<p>4,000</p> <p>Feet</p>		



Overspray
(~12,500 square feet)

Release Area
(~3,300 square feet)

LEGEND

REVISED:

120 SHEET
1 of 1

DWG By: D Dominguez
April 2016

Lea County, New Mexico
SW 1/4 of SE 1/4, Sec. 11, T15S, R37E
N 33° 1' 38.08" W 103° 10' 5.05"
Elevation: 3,796 feet amsl

Figure 3
Site Map
Legacy, L.P.
JM Denton A #2

TABLES

TABLE 1

Well Data

Legacy, L.P. - JM Denton A #2

Ref #	Well Number	Use	Diversion ^A	Owner	q64	q16	q4	Sec	Twsp	Rng	Eastng	Northing	Distance ^B	Date Measured	Surface Elevation ^C	Depth to Water (ft.bgs)
1	L 01080	PRO	0	MCALESTER FUEL CO.	1	2	2	14	15S	37E	671336	3655412	457	03-Mar-52	3,791	32
2	L 07665	PRO	0	M G F DRILLING COMPANY INC	4	4	4	11	15S	37E	671529	3655614	475	29-Mar-77	3,791	40
3	L 02302	PRO	0	STONE DRILLING COMPANY	2	2	4	11	15S	37E	671521	3656216	599	07-Aug-53	3,796	45
4	L 01117	PRO	0	PHILLIPS PETROLEUM CO	3	4	2	11	15S	37E	671314	3656419	659	11-May-51	3,797	50
5	L 01283	PRO	0	PHILLIPS PETROLEUM COMPANY		3	2	11	15S	37E	671012	3656515	720	23-Oct-51	3,799	40
6	L 01321	PRO	0	LLANO DRILLING CO.		4	2	11	15S	37E	671415	3656520	791	21-Dec-51	3,796	32
7	L 01568	DOL	3	OLLIBEL C CARD ESTATE		1	3	12	15S	37E	671826	3656122	803	10-Sep-52	3,792	38
8	L 01045	PRO	0	MCALESTER FUEL CO.	1	3	2	14	15S	37E	670939	3655004	808	06-Oct-50	3,793	35
9	L 01199	PRO	0	GULF OIL CORP	2	4	1	14	15S	37E	670736	3654999	874	24-Jul-51	3,795	37
10	L 02382	DOM	3	GULF REFINING COMPANY		4	2	14	15S	37E	671444	3654911	955	10-Nov-53	3,790	35
11	L 02391	STK	3	J M DENTON	3	3	3	11	15S	37E	670118	3655599	992	24-Oct-53	3,800	37
12	L 01324	PRO	0	PHILLIPS PETROLEUM CO.		1	2	11	15S	37E	671004	3656917	1,121	27-Dec-51	3,800	32
13	L 01332	PRO	0	BRINKENHOFF DRILLING CO.		2	2	11	15S	37E	671408	3656922	1,167	17-Nov-51	3,799	32
14	L 01430	PRO	0	PHILLIPS PETROLEUM CO		2	1	11	15S	37E	670601	3656913	1,217	14-Apr-52	3,804	33
15	L 02268	PRO	0	SHELL OIL CO.		2	4	10	15S	37E	669808	3656097	1,316	21-Jun-53	3,807	55
16	L 01207	PRO	0	PARKER DRILLING CO		2	2	15	15S	37E	669823	3655292	1,364	31-Jul-51	3,805	32
17	L 04956	STK	3	DICKINSON HEIRS		1	1	12	15S	37E	671710	3657026	1,375	21-Sep-76	3,801	43
18	L 02317	PRO	0	TRINITY DRILLING COMPANY		1	1	11	15S	37E	670197	3656908	1,424	13-Aug-53	3,809	65
19	L 09926	PRO	0	NORTH AMERICAN ROYALTIES	3	1	4	12	15S	37E	672479	3656131	1,428	01-Jul-87	3,789	75
20	L 01322	PRO	0	CORBETT DRILLING CO.		2	1	11	15S	37E	670296	3657007	1,446	20-Dec-51	3,806	32
21	L 01182	DOM	3	PHILLIPS PETROLEUM COMPANY	1	1	1	11	15S	37E	670096	3657007	1,565	19-Jul-51	3,810	35
22	L 01739	PRO	0	SHELL OIL COMPANY	2	2	2	10	15S	37E	669893	3657001	1,697	21-Jan-53	3,810	55

* = Data obtained from the New Mexico Office of the State Engineer Website (http://iwaters.ose.state.nm.us:7001/IWATERS/wr_RegisServlet1)

^A = In acre feet per annum

^B = In meters

^C = Elevation interpolated from satellite map based on referenced location.

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

DOL = 72-12-1 Domestic and Livestock watering

DOM = 72-12-1 Domestic one household

STK = 72-12-1 Livestock watering

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

ATTACHMENTS

**ATTACHMENT I
PHOTOGRAPHS**



Photograph #1- Overspray area on northeast end of release



Photograph #2- Overspray area on northeast end of release



Photograph #3- Looking southeast across release area



Photograph #4- Looking east across release area



Photograph #5- Looking north across release area and overspray area



Photograph #6- Looking north across release area and overspray area

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

Information and Ranking		Incident Date:	NMOCD Notified:
Site: JM Denton A #2		Assigned Site Reference #:	
Company: Legacy, L.P.			
Street Address:			
Mailing Address: P.O. Box 10848			
City, State, Zip: Midland, Texas, 79702			
Representative: Manuel Soriano			
Representative Telephone: (432) 269 – 8809			
Telephone:			
Fluid volume released (bbls): 40 bbls		Recovered (bbls): 35 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: JM Denton A #2			
Source of contamination: Tank Battery			
Land Owner, i.e., BLM, ST, Fee, Other: Fee			
LSP Dimensions:			
LSP Area: ~ 3,300 sq. ft.			
Location of Reference Point (RP):			
Location distance and direction from RP:			
Latitude: N 33° 1' 38.08"			
Longitude: W 103° 10' 5.05"			
Elevation above mean sea level: 3,796 feet			
Feet from Section Line:			
Feet from Section Line:			
Location- Unit or ¼/¼: SW¼ of the SE¼		Unit Letter: O	
Location- Section: 11			
Location- Township: T15S			
Location- Range: R37E			
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): ~ 55'			
Depth of contamination (DC): unknown			
Depth to ground water (DG – DC = DtGW): ~ 55'			
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>			
		3. Distance to Surface Water Body	
		<200 horizontal feet: <i>20 points</i>	
		200-100 horizontal feet: <i>10 points</i>	
		>1000 horizontal feet: <i>0 points</i>	
<i>Site Rank (1+2+3) = 10 + 0 + 0 = 10</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

Form C-141
Revised August 8, 2011

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

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: Legacy, L.P.	Contact: Manuel Soriano
Address: P.O. Box 10848, Midland, Texas 79702	Telephone No. 432-269-8806
Facility Name: JM Denton A #2	Facility Type: Battery

Surface Owner: Darr Angell	Mineral Owner:	API No. 30-025-05274
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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
O	11	15S	37E	810	South	1980	East	Lea

Latitude: N 33.027241° Longitude: W 103.168076°

NATURE OF RELEASE

Type of Release: oil and produced water	Volume of Release: ~40 bbls	Volume Recovered: ~35 bbls
Source of Release: transfer pump quit	Date and Hour of Occurrence:	Date and Hour of Discovery:
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

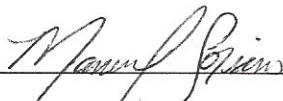
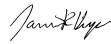
Describe Cause of Problem and Remedial Action Taken.*

The transfer pump quit causing the release of approximately 40 bbls oil and produced water. Vacuum trucks were called in to draw up standing fluid.

Describe Area Affected and Cleanup Action Taken.*

The spill impacted approximately 3,300 sq. ft. of caliche tank battery pad. An overspray area of approximately 12,300 sq. ft. was treated with Micro-Blaze. Vacuum trucks collected approximately 35 bbls of fluid from within containment. The stained soil has been scraped up and hauled to a state approved disposal facility.

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: 	OIL CONSERVATION DIVISION	
Printed Name: Manuel Soriano	Approved by Environmental Specialist: 	
Title: Production Foreman	Approval Date: 05/05/2016	Expiration Date: 07/05/2016
E-mail Address: jsoriano@legacylp.com	Conditions of Approval: Discrete samples only. Delineate and remediate per NMOCD guidelines.	Attached <input type="checkbox"/> IRP 4269
Date: 5-5-2016	Phone: 432-269-8806	

* Attach Additional Sheets If Necessary

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