

SPILL VOLUME ESTIMATION SUMMARY

Date: 4/30/2024

Facility: NM-35 Pipeline

State: New Mexico

Material Released: Crude Oil

Free Oil Recovered: 10 bbl

| Summary of Total Spill Volume       |         |         |
|-------------------------------------|---------|---------|
| Category                            | Gallons | Barrels |
| Total (Spill to Containment)        | 0       | 0       |
| Total (Spill to Land)               | 1591    | 38      |
| Grand Total Spill Volume            | 1591    | 38      |
| Grand Total Oil Volume <sup>1</sup> | 954     | 23      |

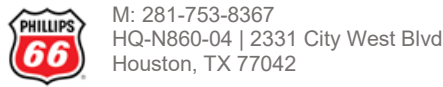
Note: 1. Oil vol based on spill being 60% oil / 40% water.

| Summary of Impacted Areas (Spill to Containment) |         |         |
|--|---------|---------|
| Category   | Gallons | Barrels |
| In Containment                                   | 0       | 0       |
| Total (Spill to Containment)                     | 0       | 0       |

| Summary of Impacted Areas (Spill to Land) |         |         |
|---|---------|---------|
| Category                                  | Gallons | Barrels |
| In Soil                                   | 1591    | 38      |
| On Impermeable Surfaces                   | 0       | 0       |
| In Poned or Pooling Areas                 | 0       | 0       |
| On Piping                                 | 0       | 0       |
| On Rock/Gravel                            | 0       | 0       |
| In Linear Ditch                           | 0       | 0       |
| Total (Spill to Land)                     | 1591    | 38      |

Cell 432-557-2330

Ruben Herrera, P.E.  
Sr. Environmental Engineer – GP Triad, TL Permian



**From:** Wells, Shelly, EMNRD <[Shelly.Wells@emnrd.nm.gov](mailto:Shelly.Wells@emnrd.nm.gov)>  
**Sent:** Thursday, May 2, 2024 4:23 PM  
**To:** Herrera, Ruben <[Ruben.Herrera@p66.com](mailto:Ruben.Herrera@p66.com)>  
**Subject:** RE: [EXTERNAL] Request guidance on C-141 submittal for minor oil release

**This Message Is From an External Sender**  
This message came from outside your organization.

Report Suspicious

Hi Ruben,

In order to find out the P66 administrator, and in there absence, become one or just to get permissions to submit things on the OCD site, please reach out to [OCD@admincomp@emnrd.nm.gov](mailto:OCD@admincomp@emnrd.nm.gov) and they can get you access to the portal.

Once you have this access, you can submit your NOR (Notice of Release) on the OCD Permitting site. You will click on Submissions, Releases, and NOTIFY. After entering release information you will be given an incident number which you can then use to file the initial C-141 which does have a \$150 fee attached. I have attached the Public Notice regarding our C-141 submission process which can answer some questions for you. Should you run into problems when trying to file the initial C-141 feel free to reach out to me.

Kind regards,

Shelly

**Shelly Wells** \* Environmental Specialist-Advanced  
Environmental Bureau  
EMNRD-Oil Conservation Division  
1220 S. St. Francis Drive|Santa Fe, NM 87505  
(505)469-7520|[Shelly.Wells@emnrd.nm.gov](mailto:Shelly.Wells@emnrd.nm.gov)  
<http://www.emnrd.state.nm.us/OCD/>

**From:** Herrera, Ruben <[Ruben.Herrera@p66.com](mailto:Ruben.Herrera@p66.com)>  
**Sent:** Thursday, May 2, 2024 9:54 AM  
**To:** Wells, Shelly, EMNRD <[Shelly.Wells@emnrd.nm.gov](mailto:Shelly.Wells@emnrd.nm.gov)>  
**Subject:** RE: [EXTERNAL] Request guidance on C-141 submittal for minor oil release

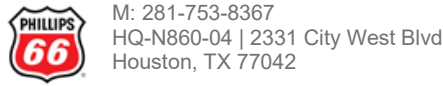
Good morning Shelly,

I’m going to have to take you up on your offer for help. I reached out to my peers (other env specialists) and none have accounts with NMOCD. Unbelievable, I know. Anyway, I need to create an account so I can complete/submit the C-141. My thought is to schedule some time with you so you can step me through the process, unless you have a how-to guide for creating new account. If the step-through is okay, what is your availability next week?

- Before we start working on my new account, there are a couple of things we need to address.
1. P66 Pipelines, LLC owns the crude oil lines and pump / meter stations, but P66 Pipelines is owned by P66 Company. I hope this doesn’t cause any issues.
  2. My colleagues said that my account will need to be approved by the P66 Company administrator. If possible, please provide the name of that person because neither I or my colleagues know who’s the administrator.

Thank you for your help!

Ruben Herrera, P.E.  
Sr. Environmental Engineer – GP Triad, TL Permian



**From:** Wells, Shelly, EMNRD <[Shelly.Wells@emnrd.nm.gov](mailto:Shelly.Wells@emnrd.nm.gov)>  
**Sent:** Wednesday, May 1, 2024 10:34 AM  
**To:** Herrera, Ruben <[Ruben.Herrera@p66.com](mailto:Ruben.Herrera@p66.com)>  
**Cc:** Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>  
**Subject:** RE: [EXTERNAL] Request guidance on C-141 submittal for minor oil release

**This Message Is From an External Sender**  
This message came from outside your organization.

Report Suspicious

Good morning Ruben,

The only way to submit a C-141 for both major and minor releases is online via OCD Permitting. Per 19.15.29.10 NMAC, you have 15 days from the date of discovery to submit an NOR (Notice of Release) and then an initial C-141 online. I have attached the Public Notice document which helps you through the submittal process. If you run into problems doing so you can reach out to me with questions.

Kind regards,

Shelly

Shelly Wells \* Environmental Specialist-Advanced  
Environmental Bureau  
EMNRD-Oil Conservation Division  
1220 S. St. Francis Drive|Santa Fe, NM 87505  
(505)469-7520|Shelly.Wells@emnrd.nm.gov  
<http://www.emnrd.state.nm.us/OCD/>

**From:** Herrera, Ruben <Ruben.Herrera@p66.com>  
**Sent:** Wednesday, May 1, 2024 8:30 AM  
**To:** Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>  
**Subject:** [EXTERNAL] Request guidance on C-141 submittal for minor oil release

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

I need to submit a C-141 for a minor oil release (between 5-25 bbls). Per the guidance document issued 12-1-23 (pic below), I need to log into OCD Permitting and submit the information electronically. Is this the only way to submit information for a minor release, or can I submit documentation via email?


State of New Mexico  
Energy, Minerals and Natural Resources Department

Michelle Lujan Grisham  
Governor

Sarah Cottrell Propst  
Cabinet Secretary

Dylan Fuge  
Deputy Secretary


Dylan Fuge, Division Director (Acting)  
Oil Conservation Division



NOTICE  
Process Updates re: Submissions of Form C-141 Release Notification and  
Corrective Actions.

12/01/2023

Ruben Herrera, P.E.  
Sr. Environmental Engineer – GP Triad, TL Permian



M: 281-753-8367  
HQ-N860-04 | 2331 City West Blvd  
Houston, TX 77042

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Released to Imaging: 5/15/2024 9:15:32 AM

**District I**  
1625 N. French Dr., Hobbs, NM 88240  
Phone:(575) 393-6161 Fax:(575) 393-0720  
**District II**  
811 S. First St., Artesia, NM 88210  
Phone:(575) 748-1283 Fax:(575) 748-9720  
**District III**  
1000 Rio Brazos Rd., Aztec, NM 87410  
Phone:(505) 334-6178 Fax:(505) 334-6170  
**District IV**  
1220 S. St Francis Dr., Santa Fe, NM 87505  
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico  
Energy, Minerals and Natural Resources  
Oil Conservation Division  
1220 S. St Francis Dr.  
Santa Fe, NM 87505

QUESTIONS  
  
Action 344351

QUESTIONS

|   |   |
|---|---|
| Operator:<br>PHILLIPS PETROLEUM CO<br>4001 Penbrook<br>Odessa, TX 79762 | OGRID:<br>17643   |
|   | Action Number:<br>344351                                |
|   | Action Type:<br>[C-141] Initial C-141 (C-141-v-Initial) |

QUESTIONS

|                  |  |
|------------------|--|
| Prerequisites    |  |
| Incident ID (n#) | nAPP2413552773                         |
| Incident Name    | NAPP2413552773 NM-35 PIPELINE LEAK @ 0 |
| Incident Type    | Oil Release                            |
| Incident Status  | Initial C-141 Received                 |

|  |                     |
|--|---------------------|
| Location of Release Source                     |                     |
| Please answer all the questions in this group. |                     |
| Site Name                                      | NM-35 Pipeline Leak |
| Date Release Discovered                        | 04/30/2024          |
| Surface Owner                                  | Private             |

|  |             |
|--|-------------|
| Incident Details   |             |
| Please answer all the questions in this group.   |             |
| Incident Type  | Oil Release |
| Did this release result in a fire or is the result of a fire   | No          |
| Did this release result in any injuries  | No          |
| Has this release reached or does it have a reasonable probability of reaching a watercourse          | No          |
| Has this release endangered or does it have a reasonable probability of endangering public health    | No          |
| Has this release substantially damaged or will it substantially damage property or the environment   | No          |
| Is this release of a volume that is or may with reasonable probability be detrimental to fresh water | No          |

|  |   |
|--|---|
| Nature and Volume of Release   |   |
| Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission. |   |
| Crude Oil Released (bbls) Details  | Cause: Repair and Maintenance   Pipeline (Any)   Crude Oil   Released: 38 BBL   Recovered: 10 BBL   Lost: 28 BBL. |
| Produced Water Released (bbls) Details   | Not answered.   |
| Is the concentration of chloride in the produced water >10,000 mg/l  | No  |
| Condensate Released (bbls) Details   | Not answered.   |
| Natural Gas Vented (Mcf) Details   | Not answered.   |
| Natural Gas Flared (Mcf) Details   | Not answered.   |
| Other Released Details   | Not answered.   |
| Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)                                 | Not answered.   |

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**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
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**Santa Fe, NM 87505**

QUESTIONS, Page 2

Action 344351

**QUESTIONS (continued)**

|   |   |
|---|---|
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**QUESTIONS**

| <b>Nature and Volume of Release (continued)</b>  |  |
|--|--|
| Is this a gas only submission (i.e. only significant Mcf values reported)  | <b>No, according to supplied volumes this does not appear to be a "gas only" report.</b>   |
| Was this a major release as defined by Subsection A of 19.15.29.7 NMAC   | <b>Yes</b>   |
| Reasons why this would be considered a submission for a notification of a major release  | <b>From paragraph A. "Major release" determine using:<br/>(1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.</b> |
| <i>With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.</i> |  |

**Initial Response**

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

|  |                      |
|--|----------------------|
| The source of the release has been stopped   | <b>True</b>          |
| The impacted area has been secured to protect human health and the environment                                     | <b>True</b>          |
| Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices | <b>True</b>          |
| All free liquids and recoverable materials have been removed and managed appropriately                             | <b>True</b>          |
| If all the actions described above have not been undertaken, explain why   | <b>Not answered.</b> |

*Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.*

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.

|  |  |
|--|--|
| I hereby agree and sign off to the above statement | Name: Ruben Herrera<br>Title: Sr. Environmental Engineer<br>Email: ruben.herrera@p66.com<br>Date: 05/14/2024 |
|--|--|

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QUESTIONS, Page 3

Action 344351

**QUESTIONS (continued)**

|   |   |
|---|---|
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|   | Action Number:<br>344351                                |
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**QUESTIONS****Site Characterization**

Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). 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 in feet below ground surface (ft bgs) | Between 51 and 75 (ft.)        |
| What method was used to determine the depth to ground water  | Direct Measurement             |
| Did this release impact groundwater or surface water   | No                             |
| <b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>   |                                |
| A continuously flowing watercourse or any other significant watercourse  | Greater than 5 (mi.)           |
| Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)  | Between 1 and 5 (mi.)          |
| An occupied permanent residence, school, hospital, institution, or church  | Greater than 5 (mi.)           |
| A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes  | Between 1000 (ft.) and ½ (mi.) |
| Any other fresh water well or spring   | Between 1000 (ft.) and ½ (mi.) |
| Incorporated municipal boundaries or a defined municipal fresh water well field  | Greater than 5 (mi.)           |
| A wetland  | Greater than 5 (mi.)           |
| A subsurface mine  | Greater than 5 (mi.)           |
| An (non-karst) unstable area   | Greater than 5 (mi.)           |
| Categorize the risk of this well / site being in a karst geology   | Low                            |
| A 100-year floodplain  | Greater than 5 (mi.)           |
| Did the release impact areas not on an exploration, development, production, or storage site                               | No                             |

**Remediation Plan**

Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

|  |    |
|--|----|
| Requesting a remediation plan approval with this submission  | No |
| The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required. |    |

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CONDITIONS

Action 344351

CONDITIONS

|   |   |
|---|---|
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CONDITIONS

|            |           |                |
|------------|-----------|----------------|
| Created By | Condition | Condition Date |
| scwells    | None      | 5/15/2024      |