

Jason, Tanner

From: Nathan Ford <nford@pilotwater.com>
Sent: Thursday, October 23, 2025 8:19 AM
To: Virden, Kelby J.
Cc: Jason, Tanner
Subject: [EXTERNAL] Re: MPLX Incident - Information Needed
Attachments: IMG_1281.jpeg

This message is from an external sender.

Messages coming from outside MPC should be examined more closely.

It is the length and size of line with the amount of water that was going through it for the timeframe that the line got hit, reported, and isolated.

Attached is the line strike itself if you need it also

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From: Virden, Kelby J. <KJVirden@marathonpetroleum.com>
Sent: Wednesday, October 22, 2025 2:56:39 PM
To: Nathan Ford <nford@pilotwater.com>
Cc: Jason, Tanner <TJason@marathonpetroleum.com>
Subject: MPLX Incident - Information Needed

CAUTION: External Sender Email: Use caution with links / attachments.

Nathan,

To complete our incident and remediation submittal to the NM OCD we need an outline for the calculations used to determine the 1200 bbls of produced water Pilot estimated was released during the incident. Is that something we can get from your team so we can ensure we have the information needed by NM OCD and in the timeline, they requested?

Please feel free to reach out if you have any questions.

Regards,

Kelby Virden

MPLX Construction Manager
Gathering and Processing West Region

C (435) 375-8373
E KJVirden@marathonpetroleum.com
1680 Hwy 40, Suite 203

Vernal, Utah 84078



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October 22, 2025

New Mexico Oil Conservation Division

506 W. Texas Ave
Artesia, NM 88210

RE: **East Loop 20" HP – Site Characterization & Initial Remediation Plan**

Incident Number: nAPP2528933921

GPS: 32.086121°, -103.622019°

Lea County, New Mexico

ESRR Project No. P0.25000349/25.00007576.00

To Whom It May Concern:

Earth Systems Response & Restoration (ESRR), on behalf of Marathon Petroleum (MPLX), presents the following Site Characterization & Initial Remediation Plan (SCIRP) detailing a scope of work to address soil impacts associated with an inadvertent release of produced water at the East Loop 20" HP (Site). MPLX proposes this SCIRP, detailing remediation objectives to mitigate environmental impacts at the Site.

Site Location

The Site is located in Unit I, Section 36, Township 25 South, Range 32 East, in Lea County, New Mexico (32.086121°, -103.622019°) and is associated with oil and gas exploration and production operations on State Land managed by the New Mexico State Land Office (NMSLO) (**Figure 1**).

Incident Description & Background

On October 14, 2025, a line strike occurred during an adjacent horizontal boring of a MPLX subsurface pipeline, causing the release of approximately 1,200 barrels (bbls) of produced water from a Pilot Water Solutions (Pilot) pipeline and onto adjacent pipeline right-of-ways (ROW). The Pilot pipeline was reported to be 8-12 feet below grade surface (bgs) at the point of release (POR).

ESRR was retained on October 16, 2025, and conducted initial site assessment activities by mapping the observed release footprint on October 17, 2025, hereafter referred to as the Area of Concern (AOC) (**Figure 1A**).

MPLX gave notice of the release to the New Mexico Oil Conservation Division (NMOCD) on October 16, 2025, by Notification of Release (NOR), which was subsequently assigned Incident Number nAPP2528933921. MPLX anticipates submitting a Corrective Action Form C-141 (Form C-141) to the NMOCD by October 29, 2025.

Site Characterization

ESRR characterized the Site according to Table I, Closure Criteria for Soils Impacted by a Release, of Title 19, Chapter 15, Part 29, Section 12 (19.15.29.12) of the New Mexico Administrative Code (NMAC). The following proximities were estimated:

East Loop 20" HP - Closure Request Report
 Incident Number: nAPP2528933921
 32.086121°, -103.622019°



- Between 1,000 feet and ½ mile of any continuously flowing watercourse or any other significant watercourse;
- Between 1 and 5 miles of any lakebed, sinkhole or playa lake (measured from the ordinary high-water mark);
- Greater than 5 miles of any occupied permanent residence, school, hospital, institution or church;
- Between 1 and 5 miles of any spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes;
- Between 1 and 5 miles of any other freshwater well or spring;
- Greater than 5 miles of any incorporated municipal boundary or a defined municipal fresh water well field covered under a municipal ordinance;
- Between 1,000 feet and ½ mile of any wetland;
- Greater than 5 miles of any subsurface mine;
- Overlying an unstable area (i.e. critical/ high/ medium karst potential); and
- Greater than 5 miles of a 100-year floodplain.

Receptor details used to determine the Site characterization are included in **Figure 1B** and **Figure 1C**. **Referenced Well Records** for the closest depth to water well are attached.

Based on the results from the desktop review, the Site is designated with medium karst potential with no depth to water wells within ½ mile with logged data no greater than 25 years old. Based on NMAC 19.15.29.12, the following Closure Criteria was applied:

Constituents of Concern (COCs)	Closure Criteria [‡]
Chloride	600 milligram per kilogram (mg/kg)
Total Petroleum Hydrocarbon (TPH)	100 mg/kg
Benzene	10 mg/kg
Benzene, Toluene, Ethylbenzene, Total Xylenes (BTEX)	50 mg/kg

[‡]The reclamation concentration requirements of 600 mg/kg Chloride and 100 mg/kg TPH apply to the top 4 feet of areas to be immediately reclaimed following remediation pursuant to NMAC 19.15.17.13.

TPH= Gasoline Range Organics + Diesel Range Organics + Oil Range Organics

Laboratory Analytical Methods used: Environmental Protection Agency (EPA) 300.0, EPA 8015 NM, EPA 8021 B

Proposed Delineation Activities

ESRR anticipates conducting initial delineation activities to assess the presence or absence of residual soil impacts associated with the AOC by means of hand tools and/ or mechanical equipment. Prior to any ground disturbance, ESRR will ensure a NM811 one call ticket is in place with cleared positive responses and that all underground facilities within the existing pipeline corridor have been clearly identified and/ or marked, while abiding to all one call requirements.

Eleven delineation boreholes (HA-1 through HA-11) will be advanced within the AOC and sixteen delineation boreholes (HA-12 through HA-27) around the AOC. Delineation activities will be driven by field screening soil for chloride utilizing QuanTab® test strips.

Approximately two to three soil samples, at minimum, will be collected from each delineation borehole, representing the highest observed field screening concentration and/or the greatest depth. Delineation soil samples will be placed directly into lab provided pre-cleaned jars, packed with minimal void space, labeled, and placed on ice. The delineation soil samples will then be transported under strict chain-of-custody procedures, to Eurofins in Carlsbad, New Mexico, for analysis of the COCs. The locations of all proposed delineation soil samples are shown in **Figure 2**.

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Proposed Remediation Plan

- Prior to any use of mechanical equipment in areas outside of the MPLX ROW, MPLX will acquire a Right-of-Entry (ROE) from the NMSLO.
 - MPLX will adhere to all compliance requirements for the Cultural Protection (CPP) Rule (19.2.24 NMAC).
- MPLX will conduct excavation activities to remove any impacted soil greater than the Site Closure Criteria and/ or the reclamation standard.
 - Excavation depths and total area will be subject to the soil sampling results from the proposed delineation activities above.
- Impacted soil will be transported to a nearby landfill facility for disposal under MPLX approved waste manifests.
- Once remediation activities are complete and receipt of final confirmation soil sample results indicates soil concentrations below the Site Closure Criteria and/ or the reclamation standard, MPLX will have the excavation backfilled with clean, locally sourced soil and restored to "as close to it's original state" as possible.

Proposed Schedule

MPLX anticipates beginning the proposed delineation activities outlined above, beginning October 2025. Remediation and restoration activities are anticipated to commence within 90 days of discovery of the release. A 90-day extension will be requested if any of the above activities are delayed due to any unforeseen circumstances.

ESRR will complete a Closure Request Report detailing excavation activities and subsequent soil sampling events by the remediation closure report due date of January 12, 2026.

If you have any questions or comments, please do not hesitate to contact Gilbert Moreno at (832) 541-7719 or gmoreno@earthsys.net. **Documentation and correspondence notifications** are attached.

Sincerely,

EARTH SYSTEMS RESPONSE & RESTORATION

A handwritten signature in black ink, appearing to read "Gilbert Moreno".

Gilbert Moreno
Carlsbad Operations Manager/ Project Geologist

A handwritten signature in black ink, appearing to read "Kris Williams".

Kris Williams, CHMM, REM
Principal

cc: Tanner Jason, Marathon Petroleum
New Mexico State Land Office

Attachments:

Figure 1 - Site Map
Figure 1A - Release Extent

East Loop 20" HP - Closure Request Report
Incident Number: nAPP2528933921
32.086121°, -103.622019°



Figure 1B - Ground Water

Figure 1C - Karst Potential

Figure 2 - Proposed Delineation Soil Sample Locations

Referenced Well Records

Photographic Documentation

NMOCD Email Documentation & Correspondance

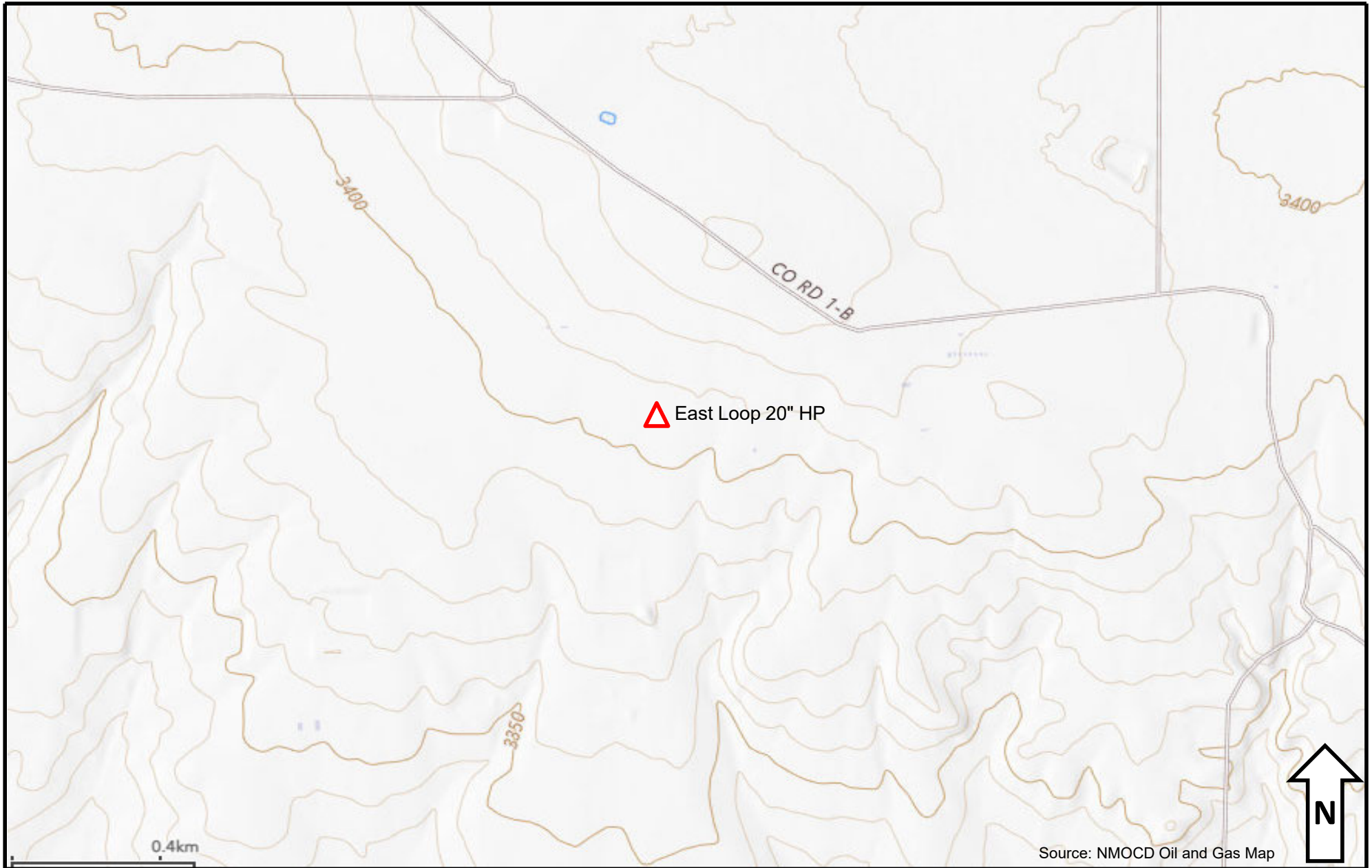


Figure 1 – Site Map

MPLX - East Loop 20" HP
GPS: 32.086111°,-103.621111°
Lea County, New Mexico



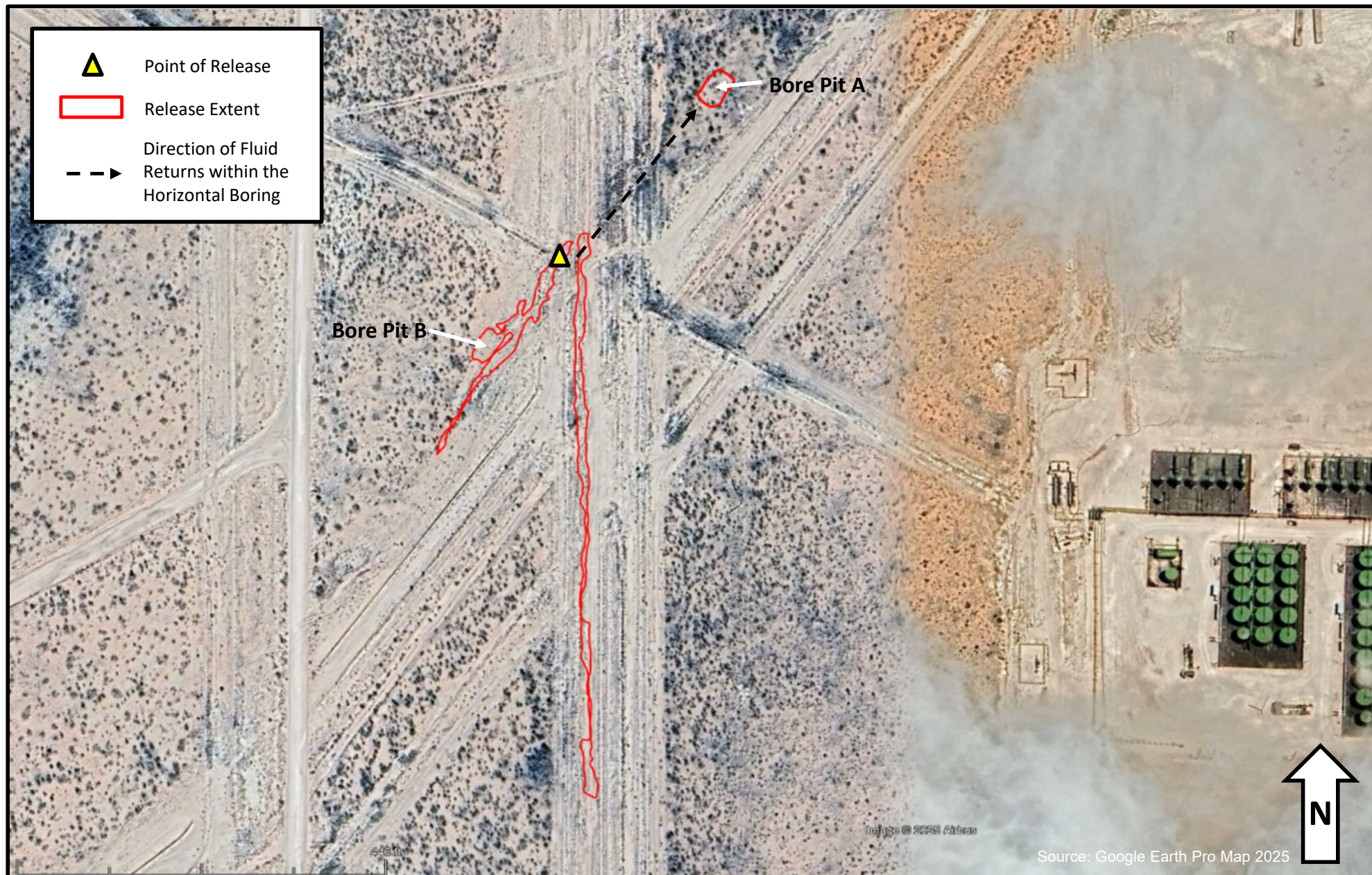


Figure 1A – Release Extent

MPLX - East Loop 20" HP
GPS: 32.086111°, -103.621111°
Lea County, New Mexico

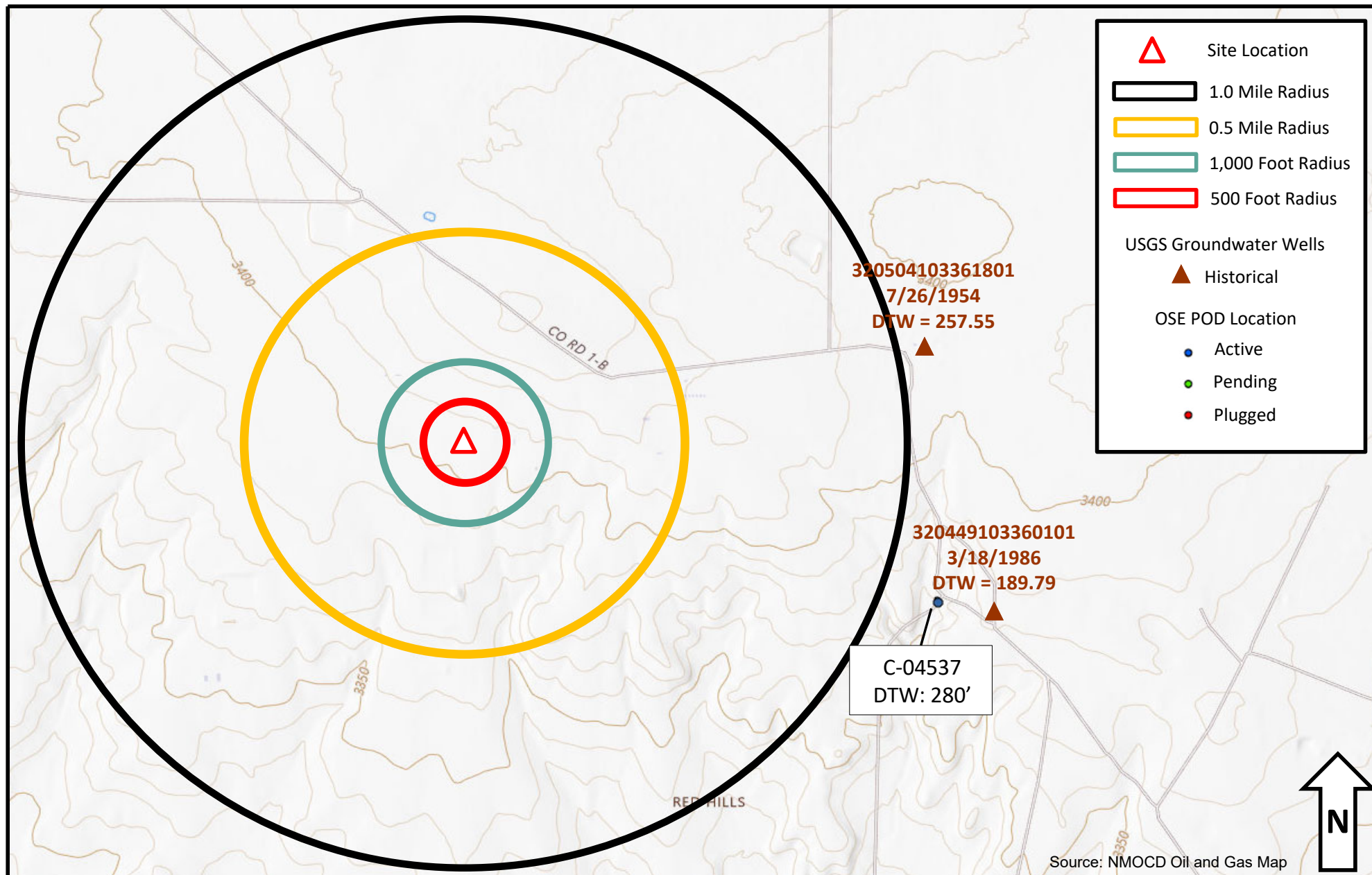


Figure 1B – Ground Water

MPLX - East Loop 20" HP
 GPS: 32.086111°, -103.621111°
 Lea County, New Mexico

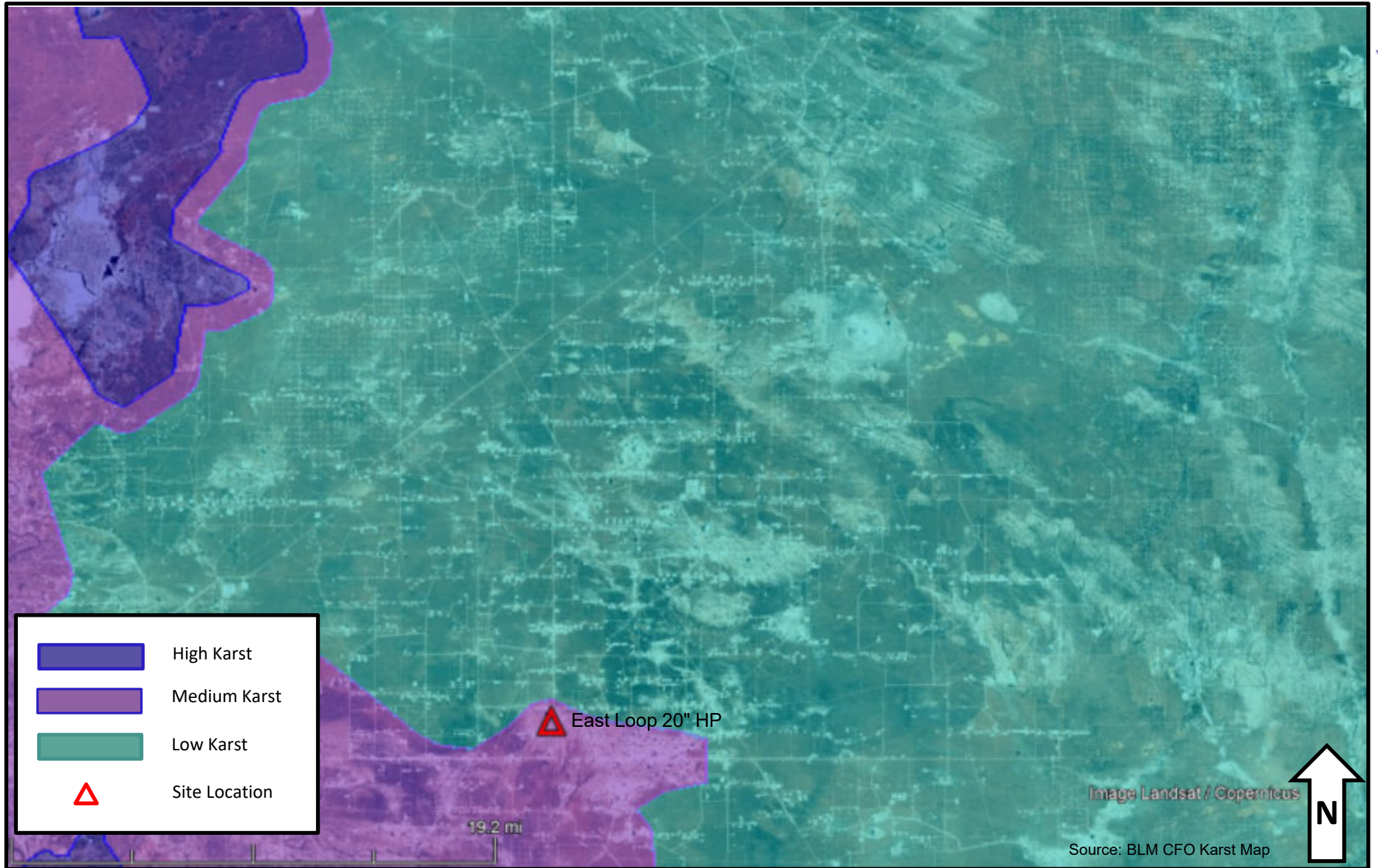


Figure 1C – Karst Potential

MPLX - East Loop 20" HP
GPS: 32.086111°,-103.621111°
Lea County, New Mexico

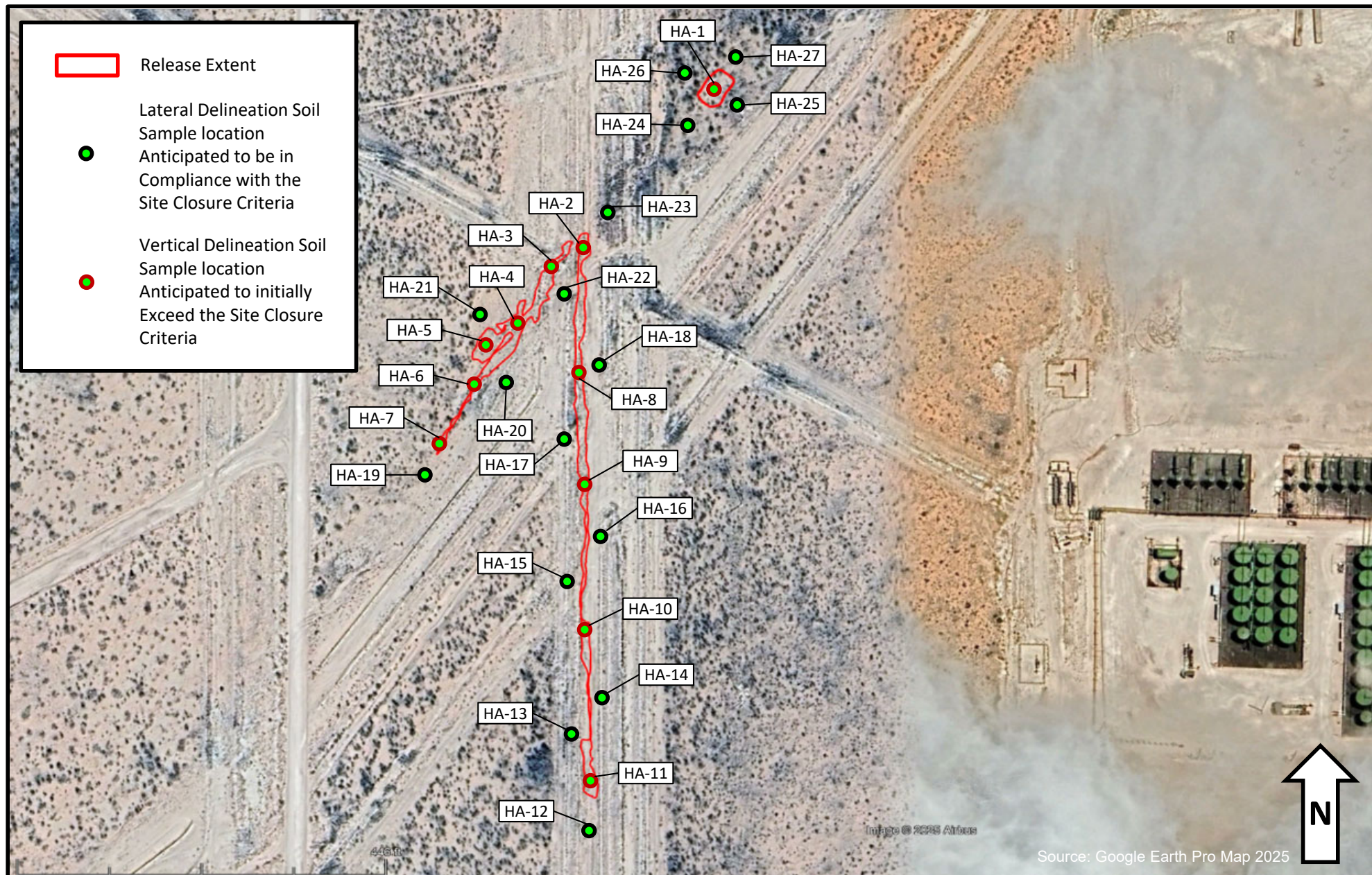


Figure 2 – Proposed Delineation Soil Sample Locations

MPLX - East Loop 20" HP
GPS: 32.086111°, -103.621111°
Lea County, New Mexico



WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

www.ose.state.nm.us

OSE 07 JUN 21 2021 #10113

1. GENERAL AND WELL LOCATION	OSE POD NO. (WELL NO.) C-4537 POD1		WELL TAG ID NO. 20E6C		OSE FILE NO(S). C-4537			
	WELL OWNER NAME(S) BASIN PROPERTIES RANCHES LLC					PHONE (OPTIONAL)		
	WELL OWNER MAILING ADDRESS 3300 N A STREET, BLDG 1, STE 220					CITY MIDLAND	STATE TX	
						ZIP 79705		
	WELL LOCATION (FROM GPS)	DEGREES LATITUDE 32	MINUTES 04	SECONDS 50.8	N	* ACCURACY REQUIRED: ONE TENTH OF A SECOND		
		LONGITUDE 103	36	10.7	W	* DATUM REQUIRED: WGS 84		
	DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS - PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE							
2. DRILLING & CASING INFORMATION	LICENSE NO. WD1706		NAME OF LICENSED DRILLER Bryce Wallace			NAME OF WELL DRILLING COMPANY Elite Drillers Corporation		
	DRILLING STARTED 06/11/21	DRILLING ENDED 06/12/21	DEPTH OF COMPLETED WELL (FT) 500	BORE HOLE DEPTH (FT) 500	DEPTH WATER FIRST ENCOUNTERED (FT) 280			
	COMPLETED WELL IS: ☐ ARTESIAN ☐ DRY HOLE ☒ SHALLOW (UNCONFINED)					STATIC WATER LEVEL IN COMPLETED WELL (FT) 280		
	DRILLING FLUID: ☒ AIR ☐ MUD ADDITIVES - SPECIFY:							
	DRILLING METHOD: ☒ ROTARY ☐ HAMMER ☐ CABLE TOOL ☐ OTHER - SPECIFY:							
	DEPTH (feet bgl)		BORE HOLE DIAM (inches)	CASING MATERIAL AND/OR GRADE (include each casing string, and note sections of screen)	CASING CONNECTION TYPE (add coupling diameter)	CASING INSIDE DIAM. (inches)	CASING WALL THICKNESS (inches)	SLOT SIZE (inches)
	FROM	TO						
	0	20	12 3/4	STEEL	N/A	8.28	.337	
	0	300	7 7/8	SDR17 PVC	SPLINE	4.3	SDR17	
	300	500	7 7/8	SDR17 PVC	SPLINE	4.3	SDR17	.032
3. ANNULAR MATERIAL	DEPTH (feet bgl)		BORE HOLE DIAM. (inches)	LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL	AMOUNT (cubic feet)	METHOD OF PLACEMENT		
	FROM	TO						
	0	20	12 3/4	CEMENT	10	TOP FILL		
	0	20	7 7/8	CEMENT	6	TOP FILL		
	300	500	7 7/8	8/16 SILICA SAND	46	TOP FILL		

FOR OSE INTERNAL USE

WR-20 WELL RECORD & LOG (Version 06/30/17)

FILE NO.	C-4537	POD NO.	1	TRN NO.	045385
LOCATION	SHK	255.33E.31.444	WELL TAG ID NO.	20E6C	PAGE 1 OF 2

19E 07 JUN 21 2021 09:19:13

[illegible]

FOR OSE INTERNAL USE		WR-20 WELL RECORD & LOG (Version 06/30/2017)	
FILE NO.	C-4537	POD NO.	1
LOCATION		TRN NO.	495385
		WELL TAG ID NO.	PAGE 2 OF 2

East Loop 20" HP - Closure Request Report
Incident Number: nAPP2528933921
32.086121°, -103.622019°



PHOTO 1: Southeastern view during initial site assessment by Contractor (Primoris). 10/14/2025



PHOTO 2: Southeastern view during initial site assessment by Contractor (Primoris). 10/14/2025

East Loop 20" HP - Closure Request Report
Incident Number: nAPP2528933921
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PHOTO 3: Southeastern view during initial site assessment by Contractor (Primoris). 10/14/2025



PHOTO 4: Northeastern view of site assessment activities. 10/17/2025

East Loop 20" HP - Closure Request Report
Incident Number: nAPP2528933921
32.086121°, -103.622019°



Date & Time: Fri, Oct 17, 2025 at 09:24:29 MDT
Position: +032.085228° / -103.621845° (± 14.1 ft)
Altitude: 3407ft (± 9.8 ft)
Datum: WGS-84
Azimuth/Bearing: 275° N85W 4889mils True ($\pm 12^\circ$)
Elevation Angle: -18.7°
Horizon Angle: -01.9°
Zoom: 0.5X
mplx east loop



PHOTO 5: Northeastern view of site assessment activities. 10/17/2025

Date & Time: Fri, Oct 17, 2025 at 09:24:56 MDT
Position: +032.085126° / -103.621984° (± 12.0 ft)
Altitude: 3403ft (± 9.8 ft)
Datum: WGS-84
Azimuth/Bearing: 335° N25W 5956mils True ($\pm 12^\circ$)
Elevation Angle: -24.3°
Horizon Angle: +02.8°
Zoom: 0.5X
mplx east loop



PHOTO 6: Northeastern view of site assessment activities. 10/17/2025

East Loop 20" HP - Closure Request Report
Incident Number: nAPP2528933921
32.086121°, -103.622019°



PHOTO 7: Northeastern view of site assessment activities. 10/17/2025



PHOTO 8: Northeastern view of site assessment activities. 10/17/2025

East Loop 20" HP - Closure Request Report
Incident Number: nAPP2528933921
32.086121°, -103.622019°



Date & Time: Fri, Oct 17, 2025 at 10:01:52 MDT
Position: +032.085529° / -103.621558° (±15.6ft)
Altitude: 3412ft (±13.2ft)
Datum: WGS-84
Azimuth/Bearing: 232° S52W 4124mils True (±11°)
Elevation Angle: -18.8°
Horizon Angle: +00.0°
Zoom: 0.5X
mplx east loop

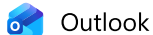


PHOTO 9: Northeastern view of site assessment activities. 10/17/2025

Date & Time: Fri, Oct 17, 2025 at 09:55:30 MDT
Position: +032.083680° / -103.621605° (±12.8ft)
Altitude: 3402ft (±9.8ft)
Datum: WGS-84
Azimuth/Bearing: 039° N39E 0693mils True (±11°)
Elevation Angle: -24.0°
Horizon Angle: -00.3°
Zoom: 0.5X
mplx east loop



PHOTO 10: Northeastern view of site assessment activities. 10/17/2025



RE: [EXTERNAL] (Notice of Spill) NMSLO-MPLX East Loop (No API/Incident # TBD)-10-14-2025

From SLO Spills <spills@nmslo.gov>

Date Tue 10/21/2025 1:32 PM

To Gilbert Moreno <gmoreno@earthsys.net>; SLO Spills <spills@nmslo.gov>

Cc czellitti@prim.com <czellitti@prim.com>; Juan Polanco <jpolanco@prim.com>; Joe Ruvalcaba <jruvalcaba@prim.com>; Jason Caballero <jcaballero@prim.com>; Joshua Garcia <joshua.garcia@prim.com>; tgarcia@prim.com <tgarcia@prim.com>; Kristopher Williams <kwilliams@earthsys.net>; TJason@marathonpetroleum.com <TJason@marathonpetroleum.com>

Gilbert,

Please see below guidance for determining compliance with the CPP and bio survey requirements. The CPP requirements are triggered if you are disturbing new ground. If the spill and remediation will be contained within areas of existing disturbance, the CPP will not apply.

Let me know if you have any additional questions.

Thank you for notifying the NMSLO Environmental Compliance Office (ECO) of the release noted in the subject line above and the potential impact to State Trust Land (STL). Once the release is stopped and contained, your cooperation in completing the subsequent remediation tasks is appreciated:

1. Identify compliance requirements for the Cultural Properties Protection (CPP) Rule (19.2.24 NMAC).
2. Using the Biological Compliance Resources below, identify any biologically sensitive areas and the avoidance, minimization, or mitigation measures appropriate for such areas.
3. Apply for a Right of Entry (ROE) for Remediation via Commercial Resources Division (CRD) if any part of the remediation occurs off of the active lease; the responsible party is not an authorized operator on the active lease; or if the remediation work is being conducted on an expired lease. A Site Delineation Plan and Reclamation Workplan are required for the ROE application.
4. If the Remediation Closure Report is not submitted within 90 days of discovery of the release, a Site Delineation Plan must be submitted to eco@nmslo.gov for review and approval. If delineation and remediation happen concurrently, a Remediation Workplan must be submitted to eco@nmslo.gov in place of a Site Delineation Plan.
5. Subsequent Workplans and Reports that must be submitted to ECO include:
 - Remediation Workplan;
 - Reclamation Workplan; or
 - Combined Remediation and Reclamation Workplan;
 - Remediation Closure Report; or
 - Combined Remediation Closure Report and Reclamation Activities Report;
 - Reclamation Activities Report; and
 - Final Reclamation Report

Instructions on the required content of each Workplan and Report can be found at the following website:

<https://www.nmstatelands.org/resources/forms-and-applications/>

SAMPLING NOTIFICATIONS

Written notification of the confirmation sampling event must be submitted to ECO a minimum of two (2) business days before the sampling event, or as directed by ECO. Please submit notifications to eco@nmslo.gov with the subject line as follows: **(Sampling Notification) Company-Location Name (API/Incident #)-Date of Incident.**

LINER INSPECTION NOTIFICATIONS

Written notification of the liner inspection event must be submitted to ECO a minimum of two (2) business days before the inspection event, or as directed by ECO. Please submit notifications to eco@nmslo.gov with the subject line as follows: **(Liner Inspection Notification) Company-Location Name (API/Incident #)-Date of Incident.**

NMSLO RESOURCES

RIGHT OF ENTRY FORMS AND RIGHTS OF WAY FORMS: <https://www.nmstatelands.org/resources/forms-and-applications/>

ECO GUIDANCE DOCUMENTS: Environmental Compliance Office: <https://www.nmstatelands.org/resources/forms-and-applications/>

LEASE STATUS MAP: <https://mapservice.nmstatelands.org/LandStatus/>

OIL & GAS MANUAL: <https://www.nmstatelands.org/wp-content/uploads/2025/09/Oil-and-Gas-Manual-2026.pdf>

LEASE SEARCH: <https://secure.slo.state.nm.us/Applications/SLOConnect/>

CULTURAL PROPERTIES PROTECTION RULE (19.2.24 NMAC)

- A.** As soon as possible, when a new release or damage occurs on STL, contact a Cultural Resource Consultant who will:
1. Conduct an Archaeological Records Management System (ARMS) review to determine if any known cultural properties have been previously identified within the remediation area and if the area has been surveyed for cultural resources.
 2. Advise as to whether an archaeological monitor should be present during initial containment activities and subsequent remediation efforts.
 3. Advise as to whether a full cultural properties survey will be required after containment and before full remediation.
- B.** A list of cultural resource consultants permitted to conduct work on state lands is maintained here: <https://www.nmhistoricpreservation.org/documents/consultants.html>
- C.** To learn more about NMSLO's Cultural Properties Protection Rule visit: <https://www.nmstatelands.org/divisions/cultural-resources-office/culturalproperties/> . The Cultural Resources Office can be contacted by email at croinfo@nmslo.gov or 505-827-5781.

BIOLOGICAL COMPLIANCE & REPORTING

Utilize the resources below to determine if the site activities are occurring in a sensitive or restricted area. ECO recommends consulting with a qualified third-party biologist for evaluation of potential impacts to threatened, endangered, and sensitive wildlife and plant species, environmentally sensitive areas, surface waters, and sensitive soils before conducting remediation and reclamation activities.

BIOLOGICAL COMPLIANCE RESOURCES

Critical Habitat Assessment Tool (CHAT): <https://nmchat.org/data-download.html>

New Mexico State Land Office Land Status Map <https://mapservice.nmstatelands.org/LandStatus>

U.S. Fish and Wildlife Services Information for Planning and Consultation: <https://ipac.ecosphere.fws.gov/>

BISON-M database: <https://bison-m.org/>

New Mexico Department of Game and Fish Environmental Review Tool (ERT): <https://nmert.org/content/map>

Open Enviro Map Wetlands: <https://gis.web.env.nm.gov/oem/?map=wetlands>

BLM NM Plant Wildlife Habitat GIS Layer:

https://gis.blm.gov/nmarcgis/rest/services/Wildlife/BLM_NM_Plant_Wildlife_Habitat/MapServer

BLM Statewide Spatial Data (<https://gbp-blm-egis.hub.arcgis.com/pages/newmexico>)

Open Enviro Map Wetlands (<https://gis.web.env.nm.gov/oem/?map=wetlands>)



Environmental Compliance Office
New Mexico State Land Office

eco@nmslo.gov
nmstatelands.org



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From: Gilbert Moreno <gmoreno@earthsys.net>

Sent: Tuesday, October 21, 2025 12:50 PM

To: SLO Spills <spills@nmslo.gov>

Cc: czellitti@prim.com; Juan Polanco <jpolanco@prim.com>; Joe Ruvalcaba <jruvalcaba@prim.com>; Jason Caballero <jcaballero@prim.com>; Joshua Garcia <joshua.garcia@prim.com>; tgarcia@prim.com; Kristopher Williams <kwilliams@earthsys.net>; TJason@marathonpetroleum.com

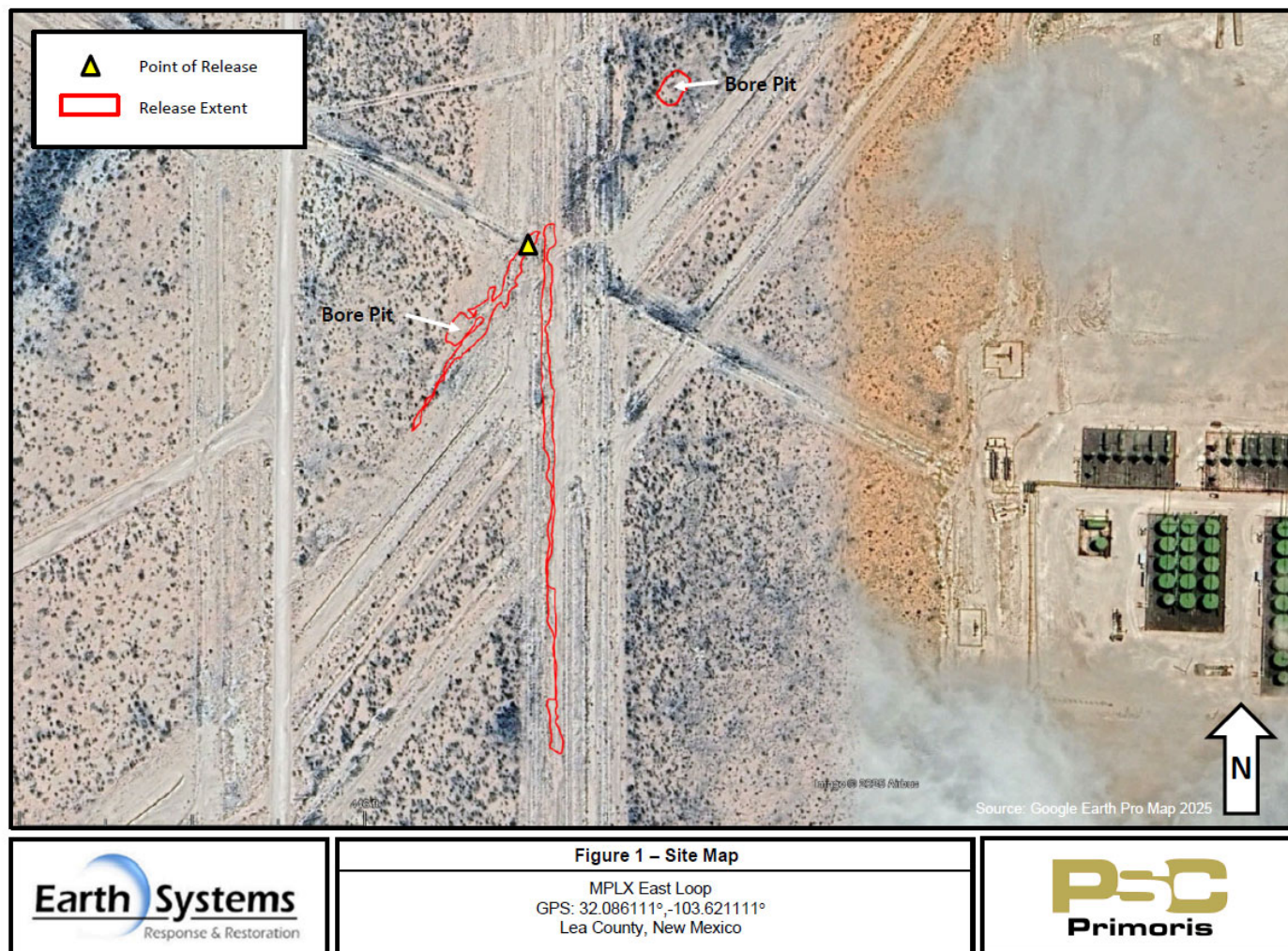
Subject: Re: [EXTERNAL] (Notice of Spill) NMSLO-MPLX East Loop (No API/Incident # TBD)-10-14-2025

Eco,

Upon further review and investigation, Earth Systems Response & Restoration has estimated the total release extent as seen below. Can you please provide guidance on any necessary forms or surveys that may be required prior to any delineation or excavation by means of

mechanical equipment (backhoe/ excavator)? Fluids appeared to have remained in previously disturbed areas and within the MPLX and adjacent pipeline right-of-ways.

Per NMOCD correspondence, the Incident number has been updated to nAPP2528933921.



Regards,

Gilbert Moreno

Carlsbad Operations Manager- Project Geologist
O: (575) 323-9034 C: (832) 541-7719
gmoreno@earthsys.net
earthsys.net



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From: Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>

Sent: Thursday, October 16, 2025 3:34 PM

To: Gilbert Moreno <gmoreno@earthsys.net>

Cc: Romero, Rosa, EMNRD <RosaM.Romero@emnrd.nm.gov>; Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>; Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>; czellitti@prim.com <czellitti@prim.com>; Juan Polanco <jpolanco@prim.com>; Joe Ruvalcaba <jruvalcaba@prim.com>; Jason Caballero <jcaballero@prim.com>; Joshua Garcia <joshua.garcia@prim.com>; tgarcia@prim.com

<tgarcia@prim.com>; Kristopher Williams <kwilliams@earthsys.net>; TJason@marathonpetroleum.com <TJason@marathonpetroleum.com>; NMSLO Environmental Compliance Office (ECO <eco@nmslo.gov>

Subject: RE: [EXTERNAL] (Notice of Spill) NMSLO-MPLX East Loop (No API/Incident # TBD)-10-14-2025

Gilbert,

Please be advised that companies without an OGRID number cannot report releases to the Oil Conservation Division (OCD) and are unable to file Notices of Release (NORs) or Form C-141s. The OCD does not assign OGRID numbers to service companies that contract with operators in the state.

Releases that occur as a result of a contractor's or subcontractor's activities must be reported by the operator for whom they are working. The operator is considered the responsible party and is required to complete any necessary remediation.

MarkWest Energy West Texas Gas Company, L.L.C. (MPLX) has already reported this release under Incident Number **nAPP2528933921**. If a contracted company will be covering the costs associated with the release, that is a private arrangement between the contractor and the operator.

All reporting related to this release must be submitted by **MarkWest Energy West Texas Gas Company, L.L.C. (MPLX)**. Any future compliance issues associated with this incident will likewise remain the responsibility of **MarkWest Energy West Texas Gas Company, L.L.C. (MPLX)** to address.

Thank you,

Brittany Hall • Environmental Field Compliance Supervisor
Environmental Field Compliance Group
EMNRD - Oil Conservation Division
1000 Rio Brazos Road | Aztec, NM 87410
505.517.5333 | Brittany.Hall@emnrd.nm.gov
<http://www.emnrd.nm.gov/ocd/>

Effective 12/1/2024: OCD has updated guidance on karst potential occurrence zones. This notice can be found at:
<https://www.emnrd.nm.gov/ocd/ocd-announcements-and-notifications/> under "2024 OCD ANNOUNCEMENTS AND NOTIFICATIONS".

The Digital C-141 guidance documents can be found at <https://www.emnrd.nm.gov/ocd/ocd-announcements-and-notifications/> or <https://www.emnrd.nm.gov/ocd/ocd-forms/>.

From: Gilbert Moreno <gmoreno@earthsys.net>

Sent: Thursday, October 16, 2025 2:08 PM

To: Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>; NMSLO Environmental Compliance Office (ECO) <eco@nmslo.gov>; Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>

Cc: Chad Zellitti <czellitti@prim.com>; Juan Polanco <jpolanco@prim.com>; Joe Ruvalcaba <jruvalcaba@prim.com>; Jason Caballero <jcaballero@prim.com>; Joshua Garcia <joshua.garcia@prim.com>; tgarcia@prim.com; Kristopher Williams <kwilliams@earthsys.net>

Subject: [EXTERNAL] (Notice of Spill) NMSLO-MPLX East Loop (No API/Incident # TBD)-10-14-2025

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

NMOCD/Eco,

A spill occurred at what is being named the MPLX East Loop on October 14, 2025. It is estimated that approximately 520 barrels of produced water have been recovered. Earth Systems R & R (ESRR) has been retained as of today, October 16, 2025, to further investigate the total impact of this release along with estimating any difference in the total number of barrels released versus the number recovered. ESRR will be performing initial site assessment activities on October 17, 2025.

Primoris Pipeline, Inc (PPI), has reported that fluids remained within a bore pit allowing for fluid recovery while remaining within the right-of-way. At the moment, no surface disturbing activities are anticipated in any undisturbed areas that would apply to the Cultural Properties Protection (CPP) Rule.

NMOCD,

Can you please provide insight on how PPI should proceed with incident reporting of a Notification of Release (NOR) and a Corrective Action Form C-141 (Form C-141)? PPI has reported that PWS has assigned all responsibility on behalf of PPI.

Date: 10/14/2025 @02:02 PM

Location: MPLX East Loop

State: New Mexico

County: Lea

Coordinates: 32.086111°,-103.621111°

Incident ID: TBD

Description: On October 14, 2025, at approximately 2:02 PM, Hard Rock Infrastructure, a subcontractor working under PPI, was performing horizontal directional drilling (HDD) activities at Bore 6 (STA: 690+73) when they inadvertently contacted a 16-inch HDPE produced water line operated by Pilot Water Solutions (PWS). Upon contacting the line, the crew immediately stopped all operations and notified PPI supervision. The area was promptly secured, and all required notifications were made. The affected line was shut in at approximately 2:57 PM; however, vacuum trucks continued to remove residual water from the area to assist in containment. Excavation and repair activities for the damaged line were scheduled to begin on October 15, 2025, and will be conducted by a contractor of PWS. A PPI representative remained on site at all times from the time of the incident until repairs were completed.



Regards,

Gilbert Moreno

Carlsbad Operations Manager- Project Geologist

O: (575) 323-9034 C: (832) 541-7719

gmoreno@earthsys.net

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Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS

Action 518086

QUESTIONS

Operator: MarkWest Energy West Texas Gas Company, L.L.C 1515 Arapahoe Street Denver, CO 80202	OGRID: 329252
	Action Number: 518086
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2528933921
Incident Name	NAPP2528933921 EAST LOOP 20" HP @ FAPP2125136221
Incident Type	Produced Water Release
Incident Status	Initial C-141 Received
Incident Facility	[fAPP2125136221] Permian Natural Gas Gathering System

Location of Release Source	
Please answer all the questions in this group.	
Site Name	East Loop 20" HP
Date Release Discovered	10/14/2025
Surface Owner	State

Incident Details	
Please answer all the questions in this group.	
Incident Type	Produced Water 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	Not answered.
Produced Water Released (bbls) Details	Cause: Other Pipeline (Any) Produced Water Released: 1,200 BBL Recovered: 586 BBL Lost: 614 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
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)	Line strike during HDD.

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QUESTIONS, Page 2

Action 518086

QUESTIONS (continued)

Operator: MarkWest Energy West Texas Gas Company, L.L.C 1515 Arapahoe Street Denver, CO 80202	OGRID: 329252
	Action Number: 518086
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
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.	

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	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	Further excavation work needed to ensure all free liquids and recoverable material are removed and managed appropriately.

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: Michael Tyler Title: Environmental Specialist Email: mgtyler@marathonpetroleum.com Date: 10/23/2025
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QUESTIONS, Page 3

Action 518086

QUESTIONS (continued)

Operator: MarkWest Energy West Texas Gas Company, L.L.C 1515 Arapahoe Street Denver, CO 80202	OGRID: 329252
	Action Number: 518086
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Site Characterization	
<i>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.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 100 and 500 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Between 1000 (ft.) and ½ (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 1 and 5 (mi.)
Any other fresh water well or spring	Between 1 and 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1000 (ft.) and ½ (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Zero feet, overlying, or within area
Categorize the risk of this well / site being in a karst geology	Medium
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	
<i>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.</i>	
Requesting a remediation plan approval with this submission	No
<i>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.</i>	

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CONDITIONS

Action 518086

CONDITIONS

Operator: MarkWest Energy West Texas Gas Company, L.L.C 1515 Arapahoe Street Denver, CO 80202	OGRID: 329252
	Action Number: 518086
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

CONDITIONS

Created By	Condition	Condition Date
nvez	None	10/24/2025