



# AE Order Number Banner

## Report Description

This report shows an AE Order Number in Barcode format for purposes of scanning. The Barcode format is Code 39.



**App Number:** pENV0000003RP9

**3RP - 9**

**BP AMERICA PRODUCTION COMPANY**

11/10/2016

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

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

Form C-141  
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in  
accordance with 19.15.29 NMAC.

**Release Notification and Corrective Action**

**OPERATOR**

☒ Initial Subsequent Report ☐ Final Report

|   |                                 |                    |
|---|---------------------------------|--------------------|
| Name of Company: BP                             | Contact: Steve Moskal           |                    |
| Address: 200 Energy Court, Farmington, NM 87401 | Telephone No.: 505-326-9497     |                    |
| Facility Name: Florance Gas Com J 016A          | Facility Type: Natural gas well |                    |
| Surface Owner: Federal                          | Mineral Owner: Federal          | API No. 3004521790 |

**LOCATION OF RELEASE**

|                  |               |                 |              |                      |                           |                        |                        |                  |
|------------------|---------------|-----------------|--------------|----------------------|---------------------------|------------------------|------------------------|------------------|
| Unit Letter<br>P | Section<br>06 | Township<br>30N | Range<br>09W | Feet from the<br>825 | North/South Line<br>South | Feet from the<br>1,030 | East/West Line<br>East | County: San Juan |
|------------------|---------------|-----------------|--------------|----------------------|---------------------------|------------------------|------------------------|------------------|

Latitude 36.83551° Longitude -107.81667°

**NATURE OF RELEASE**

|  |   |   |
|--|---|---|
| Type of Release: Produced water, oil and condensate  | Volume of Release: unknown                | Volume Recovered: none                        |
| Source of Release: Former drilling reserve pit, compressor, BGT  | Date and Hour of Occurrence:<br>unknown   | Date and Hour of Discovery: March 30,<br>2016 |
| Was Immediate Notice Given?<br><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required | If YES, To Whom?                          |   |
| By Whom? Steve Moskal  | Date and Hour:                            |   |
| Was a Watercourse Reached?<br><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  | If YES, Volume Impacting the Watercourse. |   |

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\* The site has had known impacts for several years. It has been identified that both BP and Williams Field Services are liable for remedial action. The OCD District III office issued a compliance requirement on October 6, 2015 stating BP is responsible to perform the following:



- Within 30 days BP will remediate both horizontally and vertically the area near TH-4, 5, 8, 9, 10, 11 and the area north of Williams line in the vicinity of SV-41
- Within 45 days BP will Plug and Abandon MW-3 following NMED plugging guidelines if needed.
- If it is determined that BP's operations impacted groundwater, BP will be required to submit a Draft Ground Water Remediation plan within 45 days of discovery.

Extensions may be granted to either BP or Williams concerning the onsite remediation 's as long as the following conditions are met:

- Remediation begins prior to the required timeframe.
- The extensions only allow for continuous on-site remediation.
- The extension request is made to the District prior to the lapse of the required timeframe.

Describe Area Affected and Cleanup Action Taken.\* To date, BP has begun remediation via removing all surface equipment and subsurface lines, provided an access agreement for MW-3 to Williams Filed Services and initiated vertical and horizontal remedial activities at the location. At this time BP requests an extension based on the criteria listed above. BP has fulfilled each of the requirements in order to file this extension and anticipates continuing remedial activities as access and safety allow with Williams performing simultaneous remediation. BP will communicate closely with the OCD District III office during the progression of the project in order to ensure compliance of the requirements.

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:  | <b>OIL CONSERVATION DIVISION</b>  |  |
| Printed Name: Steve Moskal   | Approved by Environmental Specialist:  |  |
| Title: Field Environmental Coordinator   | Approval Date: <u>11-10-16</u>  | Expiration Date:                             |
| E-mail Address: steven.moskal@bp.com   | Conditions of Approval:<br><u>3RP-9</u>   | Attached <input checked="" type="checkbox"/> |
| Date: November 4, 2016   | Phone: 505-326-9497   |  |

\* Attach Additional Sheets If Necessary

②

State of New Mexico  
Energy, Minerals and Natural Resources Department

Susana Martinez  
Governor

Tony Delfin  
Acting Cabinet Secretary

David R. Catanach, Division Director  
Oil Conservation Division



November 9, 2016

**Re: Extension Request**

**Well: Florance Gas Com J #16A, 30-045-21790, Section 6, Township 30N, Range 9W**

Mr. Moskal,

The Oil Conservation Division (OCD) has reviewed the BP America Production Company (BP) extension request received on November 4, 2016. Below are the OCD conditions of approval.

- BP will be granted a 30-day extension to complete remediation as outlined in the October 6, 2016 letter, so long as the remediation is continuous.
- As needed should BP have to suspend remediation's efforts due to site access and safety concerns during simultaneous operations. BP will provide notification to the OCD verbally, and in writing prior to stopping remediation. The written notification will detail why the remediation efforts need to be suspended, and provide the OCD a time frame when remediation will recommence.

Additional extensions may be granted to BP concerning the onsite remediation so long as the following conditions are met;

- Remediation is continuous or BP has been approved to suspend remediation efforts temporarily.
- The extensions only allow for continuous on-site remediation.
- The extension request is made to the District prior to the lapse of the required timeframe.

If you have additional questions, please feel free to call me at 505-334-6178 Ext. 115.

Sincerely,

Cory Smith  
Environmental Specialist  
Energy, Minerals, & Natural Resources Department  
Oil Conservation Division  
1000 Rio Brazos Rd, Aztec, NM 87410  
[cory.smith@state.nm.us](mailto:cory.smith@state.nm.us)