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District J 1625 N. French Dr., Hobbs, NM 88240 District II 211 S. Erret St. Artonia, NM 88210					New Mexico and Natural Resources			N ? 6 21	017		Form C-141 August 8, 2011		
811 S. First St., Artesia, NM 88210 <u>District III</u>				Oil C	Oil Conservation Division			Sub	Submit 1 Copy to appropriate District Office in RECEIVE ordance with 19.15.29 NMAC.				
1000 Rio Brazos Road, Aztec, NM 8/410 <u>District IV</u> 122					1220 South St. Francis Dr.					cordance v	viin 19.1	5.29 NMAC.	
1220 S. St. Francis Dr., Santa Fe, NM 87505 Santa F						, NM 875							
Release Notification and Corrective Action													
NABITI	OPERATOR Initial Report Final Report												
Name of Company WPX Energy Inc/RKI						Contact							
Address Facility Nar			r			Telephone No. 970 589 0743 Facility Type: Well Pad							
Surface Ow				Mineral C									
Surface Ow		1.41	<u></u>										
Unit Letter	Section	Township	Bongo	LOCA Feet from the		OF REI	Feet from the	East	Veet Line	Country			
Unit Letter	Section	Township	Range	reet from the		h/South Line Feet fro			East/West Line		County		
A	33	265	30E	467		FNL	660		FEL	Eddy			
			La	titude: 32.0113				1694W					
<u></u> (D		1 ***		NAT	URE	OF REL	- /				1 1 5 7		
Type of Release Source of Release		ed Water and	Oil				Release: 12 I lour of Occurr			e Recoverend Hour of			
Tank Stuffin				1/11/2017 1/11/2017 – 10:00 hrs MT									
Was Immedia	ate Notice (Yes [] No 🔲 Not R	equired	If YES, To Whom? I NMOCD Crystal Weaver & Michael Bratcher, BLM Shelly Tucker							
By Whom? K	arolina Bla					Date and Hour: 1/12/17– 8:33 hrs MT							
Was a Water		ched?	Yes 🗵			If YES, Volume Impacting the Watercourse.							
		N/A											
If a Watercou	irse was Im	pacted, Descr	ibe Fully.	* N/A									
Describe Cau	se of Probl	em and Reme	dial Actio	n Taken.*									
				ox failure. Appro inage and migrate									
Describe Are	a Affected	and Cleanup A	Action Tal	ken.*									
The impacted	l area will b		BTEX, T	The impacted soi PH, and chlorides hese results.									
regulations al public health should their c or the environ	l operators or the envi operations h nment. In a	are required to ronment. The nave failed to a	o report and acceptance adequately OCD accept	e is true and comp nd/or file certain r ce of a C-141 repo v investigate and r otance of a C-141	elease no ort by the emediate	otifications and NMOCD m contaminati	nd perform con arked as "Fina on that pose a e the operator	rective acti l Report" d threat to gr of responsi	ions for rele oes not rele ound water bility for c	eases whic ieve the op r, surface v ompliance	h may en erator of vater, hur with any	danger liability man health	
Signature:	Karolina	Blaney		OIL CONSERVATION DIVISION									
Printed Name	e: Karolina	Blaney		Approved by Environmental Specialist:									
Title: Environmental Specialist						Approval Dat	te: 1271	7	Expiration	Date: N.	A		
E-mail Address: Karolina.blaney@wpxenergy.com						Conditions of Approval:							
Date: 1/26/2				e: 970-589-0743			SHU	TIUU	un				
* Attach Addi	tional She	ets If Necess	sary								26	2P-4095	

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Operator/Responsible Party,

The OCD has received the form C-141 you provided on $\frac{1/26}{17}$ regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number $\frac{320-4095}{10}$ has been assigned. Please refer to this case number in all future correspondence.

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

The responsible person shall complete <u>division-approved corrective action</u> for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC. [emphasis added]

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District \mathcal{L} office in $\frac{1}{1650}$ on or before $\frac{2}{20}/17$. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

• Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.

• Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.

• Nominal detection limits for field and laboratory analyses must be provided.

• Composite sampling is not generally allowed.

• Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

•Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.

• If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.

• Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.

Jim Griswold OCD Environmental Bureau Chief 1220 South St. Francis Drive Santa Fe, New Mexico 87505 505-476-3465 jim.griswold@state.nm.us

Bratcher, Mike, EMNRD

From:	Blaney, Karolina <karolina.blaney@wpxenergy.com></karolina.blaney@wpxenergy.com>
Sent:	Thursday, January 26, 2017 12:51 PM
То:	'stucker@blm.gov'; Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD
Subject:	RE: WPX RDU 12 - initial C-141
Attachments:	RDU 12 - C-141.doc

Good afternoon,

Attached is the C 141 for the RDU 12 spill. We will start the excavation of the dry drainage on Monday, 1/30/17, right after an onsite with Shelly. Please let me know if you have any questions or suggestions. Thank you,

Karolina Blaney

Environmental Specialist WPX Energy Office: (575) 885-7514 Cell: (970) 589-0743 karolina.blaney@wpxenergy.com

From: Blaney, Karolina Sent: Thursday, January 12, 2017 8:33 AM To: 'stucker@blm.gov' <stucker@blm.gov>; 'Bratcher, Mike, EMNRD' <mike.bratcher@state.nm.us>; 'Weaver, Crystal, EMNRD' <Crystal.Weaver@state.nm.us> Subject: WPX RDU 12 - initial spill notification

Good morning,

WPX had a spill yesterday, 1/11/17, caused by human error; stuffing box failure. Approximately 12 bbls of oil and water was spilled with 4.5 bbls recovered from the pad. The spill migrated west of the pad, entered a dry drainage and migrated for about 100 yards. Due to access constraints, we were unable to vacuum the free standing oil from the drainage. To prevent from further migration, the oil was absorbed with dirt. The impacted area was GPS-ed and the end of the impacts in the drainage was additionally marked with a flag. We will start the excavation activities once I receive your approval. The line locate call was placed yesterday and we should be ready to go by Monday.

Please let me know if you would like an onsite prior to the excavation activities. We will do our best to minimize the impacts but, unfortunately, I think we will damage some vegetation during this cleanup.

Please let me know if you have any comments and suggestions. Thank you for your help,

Karolina Blaney

Environmental Specialist WPX Energy Office: (575) 885-7514 Cell: (970) 589-0743 <u>karolina.blaney@wpxenergy.com</u>

Bratcher, Mike, EMNRD

30-015-24193

From:	Blaney, Karolina <karolina.blaney@wpxenergy.com></karolina.blaney@wpxenergy.com>
Sent:	Thursday, January 12, 2017 8:33 AM
То:	'stucker@blm.gov'; Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD
Subject:	WPX RDU 12 - initial spill notification

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Karolina Blaney Environmental Specialist WPX Energy Office: (575) 885-7514 Cell: (970) 589-0743 <u>karolina.blaney@wpxenergy.com</u>