NM OIL CONSERVATION

ARTESIA DISTRICT

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

JUN 2 0 2017

Form C-141 Revised April 3, 2017

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe. NM 87505 RECEIVED of appropriate District Office in accordance with 19.15.29 NMAC.

Release Notification and Corrective Action										
NABIN18134992						OPERATOR				
Name of Company OXY USA INC //6/9/6						Contact CASEY L SUMMERS				
		294; HOUS		77210		Telephone No. 575-513-8289				
Facility Nar	ne ROO	22 STATE	#8]	Facility Type OIL WEL				
Surface Owner STATE Mineral Owner						STATE API No. 30-015-39654				
LOCATION OF RELEASE										
Unit Letter	Section	Township	Range	Feet from the	North/	h/South Line Feet from the East/West Line County				County
С	22	17S	28E	408	N	ORTH	1510	WEST		EDDY
Latitude_32.8260384_ Longitude104.167244_ NAD83										
NATURE OF RELEASE										
Type of Release OIL & PRODUCE WATER							Volume of Release 1 bbl OIL / 9 Volume Recovered 5 bbls bbls PW			
Source of Release STUFFING BOX PACKING						Date and Hour of Occurrence Date and Hour of Discovery				
						05/17/2017 05/22/2017				
Was Immediate Notice Given? ☑ Yes ☐ No ☐ Not Required						If YES, To Whom? MIKE BRATCHER-NMOCD; CRYSTAL WEAVER-NMOCD; AMBER GROVES-SLO				
By Whom? CASEY L SUMMERS						Date and Hour 05/22/2017 @ 8:14 AM				
Was a Watercourse Reached? ☐ Yes ☒ No						If YES, Volume Impacting the Watercourse.				
If a Watercourse was Impacted, Describe Fully.*										
Describe Cause of Problem and Remedial Action Taken.* The packing blew out in the stuffing box when over pressured, causing a spill of 1 bbl Oil and 9 bbls produce water. The packing was repaired and 5 bbls of free fluid was recovered via vacuum truck.										
Describe Area Affected and Cleanup Action Taken.*										
The affected area is approximately 20x60 FT on and a small amount off location (measurements are subject to change with future GPS track). Remediation will be completed in accordance with a remediation plan approved by the NMOCD and SLO.										
regulations a public health should their or or the enviro	Il operators or the enviroperations h nment In a	are required to ronment. The paye failed to	o report and acceptant acceptant acceptant acceptant acceptance ac	nd/or file certain ce of a C-141 rep investigate and	release n ort by the remediat	otifications a e NMOCD π e contaminat	nd perform corre- parked as "Final Fion that pose a the re the operator of	responsibility for	eleases which elieve the op- ter, surface w compliance	h may endanger erator of liability /ater, human health with any other
Signature:						OIL CONSERVATION DIVISION (a. 1/1) 1 10 1				
Printed Nam	e: CASE	L SUMME	RS	· · · · · · · · · · · · · · · · · · ·		Approved by Environmental Specialist:				
Title: ENV	VIRONMEN	TAL ADVIS	OR			Approval Date: () Appl () Expiration Date: NIA				
E-mail Addr		<u>r_summers@</u> 1	oxy.com			Conditions of Approvah (1) Attached Attached				
Date: 5	31- /	Phone:	575-513	-8289		<u> XV</u>				<u> </u>
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Operator/Responsible Party,

The OCD has received the form C-141 you provided on 6/20/17 regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 4270 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 II office in Artesia on or before 7/20/17. 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

Weaver, Crystal, EMNRD

From: Casey_Summers@oxy.com
Sent: Tuesday, June 20, 2017 2:19 PM

To: Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD; agroves@slo.state.nm.us;

Jennifer_Smith@oxy.com

Cc: cbrunson@bbcinternational.com; kswinney@bbcinternational.com;

kathy@bbcinternational.com; jgilkey@bbcinternational.com

Subject: RE: ROO 22 STATE 0008

Attachments: ROO 22 STATE #8 - INITIAL C141.pdf

I apologize to all!! Somehow this C141 slipped through the cracks and did not get sent.

Please see attached and let me know if you have any questions.

Casey Summers
O: (575)-628-4152
C: (575)-513-8289

From: Summers, Casey L

Sent: Monday, May 22, 2017 7:14 AM

To: 'Bratcher, Mike, EMNRD' <mike.bratcher@state.nm.us>; 'Weaver, Crystal, EMNRD' <Crystal.Weaver@state.nm.us>; agroves@slo.state.nm.us; Smith, Jennifer A <Jennifer_Smith@oxy.com>

Cc: 'Cliff Brunson' <cbrunson@bbcinternational.com>; 'Ken Swinney' <kswinney@bbcinternational.com>; 'Kathy Purvis' <kathy@bbcinternational.com>; 'Jennifer Gilkey' <jgilkey@bbcinternational.com>

Subject: ROO 22 STATE 0008

All,

This is to inform you that Oxy Permian had a release in Eddy County at the ROO 22 STATE 0008 on 5/17/2017.

- Release Location: Legal C-22-17S-28E, API: 30-015-39654
- Release Volume: 1 bbl of Oil and 9 bbls of Produced Water.
- Recovered: 5 bbls of total fluid recovered
- Cause of Release: PACKING BLEW OUT OF STUFFING BOX WHEN OVERPRESSURED
- Approximate Area impacted by release: 20x60 FT on and a small amount off location (measurements are subject to change with future GPS track)
- GPS Coordinates and Driving Direction: 32.8260384,-104.167244, FROM ARTESIA GO EAST ON HWY 82 12 MILES, TURN
 LEFT ON CR 208 GO 2 MILES AND THE LEAK IS ON LEFT SIDE OF ROAD

Please let me know if you have any questions.

Casey Summers O: (575)-628-4152 C: (575)-513-8289