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

AUG 1 7 2017

Form C-141 Revised April 3, 2017

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Submit 1 Copy to appropriate District Office in RECEIVE accordance with 19.15.29 NMAC.

Release Notification and Corrective Action												
NAB17210253867						OPERATOR			☐ Initial Report ☐ Final Report			
Name of Company Judah Oil 245872						Contact Blaise Campanella						
Address PO BOX 568, Artesia NM, 88221						Telephone No. 575-748-5488						
Facility Name Ford State #2						Facility Type oil						
Surface Owner State Mineral Owner						API No. 30-015-2271					22714	
LOCATION OF RELEASE												
Unit Letter	Section	Township	Range	Feet from the	North/	South Line	Feet from the	East/W	est Line	County		
F	02	22s	28e	1650		FNL	1650	FV	۷L	Edd	ly	
Latitude 32.42498 Longitude -104.06184 NAD83												
NATURE OF RELEASE												
Type of Rele	ase Produ	ced Water		1 12 11	~~~~	Volume of			Volume F	Recovered	3bbl	
Source of Release flowline						Date and Hour of Occurrence Date and Hour of Discovery 08/07/2017						
Was Immediate Notice Given?						If YES, To Whom?						
☐ Yes ☐ No ☐ Not Required						Crystal Weaver						
By Whom? Blaise Campanella						Date and Hour 08/07/2017 1pm						
Was a Watercourse Reached? Yes ▼ No						If YES, Vo	olume Impacting t	the Water	course.			
If a Watercourse was Impacted Describe Fully *												
If a watercourse was impacted, Describe Pully.												
Describe Cause of Problem and Remedial Action Taken.*												
Flowline ruptured because of a bad swedge. The line was repaired and a vac truck was called to collect free liquids. 811 called in.												
Describe Assa Affected and Cleanup Action Taken *												
Describe Area Affected and Cleanup Action Taken.*												
Area affected is approximately 5' x 60' and follows along the ROWs of two pipelines. Further remediation efforts will be per an NMOCD approved work plan.												
I hereby cert	fy that the	information g	iven abov	e is true and comp	lete to tl	he best of my	knowledge and u	ınderstan	d that purs	suant to NM	IOCD rules and	
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 atota galacel layer and low samulations												
$\Gamma = \frac{1}{2}$						OIL CONSERVATION DIVISION						
Signalre: Ann Dens												
Signarti		Approved by	Environmental S	Spacialist	11 kg	11/	\sim \sim \sim					
Printed Nam	e: Blaise	Campanella				Apploved by	Environmental S	specialisa	JWX			
Title:	Member/Ma	nager		Approval Date: 0 0 0 Expiration Date: NA								
E-mail Addr	266. july	ahoil@yahoo	rom			Conditions o	f Approval:	•	,	1	~	
	•	ahoil@yahoo.d	$\overline{}$	See attached Attached 300-4390								
Date: 8/10/2017 Phone: 575-748-5488										UNY OF		

* Attach Additional Sheets If Necessary

Operator/Responsible Party,

The OCD has received the form C-141 you provided on **8/17/17** regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number <u>3RP-4340</u> 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 9/30/17. 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; C₅ 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: Heather Patterson <heather.patterson@soudermiller.com>

Sent: Thursday, August 17, 2017 10:01 AM

To: Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD

Cc: Austin Weyant; judahoil@yahoo.com

Subject: Initial C141

Attachments: C-141 Ford State #2.pdf

Good Morning,

Please find the attached initial C-141 for the produced water spill at the Judah Oil Ford State #2 (30-015-22714).

Let me know if you have any questions.

Thank you,

Heather Patterson Staff Scientist

Souder, Miller & Associates

Engineering ♦ Environmental ♦ Surveying 201 Halagueno St Carlsbad, NM 88220 <u>ẃww.soudermiller.com</u> (575)200-5343 (mobile)



Weaver, Crystal, EMNRD

From: james campanella <judahoil@yahoo.com>

Sent: Friday, August 18, 2017 10:26 AM

To: Austin Weyant

Cc: Weaver, Crystal, EMNRD

Subject: Re: Initial C141

Good morning Crystal,

St the time of the spill I just estimated the volume. We have a vac truck pick up the fluid and it was maybe 3 bbls. It didn't even show in his sight glass. There is a solid caliche pan a few inches below the surface. After all was put together it was determined that the volume was much less.

I hope this helps.

Blaise

Sent from my iPhone

On Aug 17, 2017, at 11:31 AM, Austin Weyant austin.weyant@soudermiller.com wrote:

The immediate notification was inaccurate the C-141 is correct.

From: Weaver, Crystal, EMNRD [mailto:Crystal.Weaver@state.nm.us]

Sent: Thursday, August 17, 2017 11:22 AM

To: Heather Patterson heather.patterson@soudermiller.com; Bratcher, Mike, EMNRD

<mike.bratcher@state.nm.us>

Cc: Austin Weyant austin.weyant@soudermiller.com; judahoil@yahoo.com

Subject: RE: Initial C141

Hello all,

Yes immediate notification was provided to me just like it says on the C-141 that was submitted however at the time of the phone call (8/7/17) I was told a volume of 30bbls pw with 10+/-bbls recovered. So are the volumes on the C-141 a typo?

Thank you,

Crystal Weaver

Environmental Specialist OCD – Artesia District II 811 S. 1st Street Artesia, NM 88210

Office: 575-748-1283 ext. 101

Cell: 575-840-5963 Fax: 575-748-9720 From: Heather Patterson [mailto:heather.patterson@soudermiller.com]

Sent: Thursday, August 17, 2017 10:01 AM

To: Bratcher, Mike, EMNRD < mike.bratcher@state.nm.us >; Weaver, Crystal, EMNRD

<<u>Crystal.Weaver@state.nm.us</u>>

Cc: Austin Weyant ; judahoil@yahoo.com

Subject: Initial C141

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Let me know if you have any questions.

Thank you,

Heather Patterson

Staff Scientist

Souder, Miller & Associates

Engineering ◆ Environmental ◆ Surveying

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Carlsbad, NM 88220

www.soudermiller.com

<image001.png>

(575)200-5343 (mobile)