

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

MAR 28 2018

Form C-141
Revised April 3, 2017

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

RECEIVED

Release Notification and Corrective Action

nAB1809355413

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company	Mack Energy Corporation	Contact	Matt Buckles
Address	11344 Lovington Highway	Telephone No.	575-748-1288
Facility Name	North Pole Fed TB	Facility Type	Tank Battery

Surface Owner	BLM	Mineral Owner	BLM	API No.	30-015-36079
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LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
M	15	16S	28E	330	South	330	West	Eddy

Latitude 32.916374 Longitude -104.171295 NAD83

NATURE OF RELEASE

Type of Release	Oil	Volume of Release	25 bbls	Volume Recovered	10 Bbls
Source of Release	Heater Treater	Date and Hour of Occurrence	3/21/2018 1:00 am	Date and Hour of Discovery	3/21/2018 9:00 am
Was Immediate Notice Given?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	Mike Bratcher and Shelly Tucker		
By Whom?	Matt Buckles	Date and Hour	3/21/18 7:42 pm		
Was a Watercourse Reached?	<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.*

A gasket on an 8' x 20' heater treater developed a leak on the top side of the clean out plate. Immediately upon discovery we dug out and hauled any saturated oily dirt to an approved disposal site to prevent further leaching.

Describe Area Affected and Cleanup Action Taken.*

The area affected is directly North of the North Pole TB. The oil followed a path of 240 yards northeast less than 1 yard wide and an area northwest of the heater treater 65 yards by 35 yards. This area northwest was caused by oil spraying. The area is approximately 23,000 sq ft. We will fully delineate and discuss remediation plans.

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: Matt Buckles		OIL CONSERVATION DIVISION	
Printed Name: Matt Buckles		Signed By <i>[Signature]</i>	
Title: Environmental		Approved by Environmental Specialist:	
E-mail Address: mattbuckles@mec.com		Approval Date: 4/2/18	Expiration Date: N/A
Date: 3/28/2017	Phone: 575-748-1288	Conditions of Approval: See attached	Attached <input type="checkbox"/> 2RP-4685

4/2/18AB

Operator/Responsible Party,

The OCD has received the form C-141 you provided on 3/28/2018 regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 20P-4685 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 division-approved corrective action 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 2 office in ARTESIA on or before 4/28/2018. 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: Matt Buckles <mattbuckles@mec.com>
Sent: Wednesday, March 28, 2018 9:36 AM
To: Weaver, Crystal, EMNRD; Tucker, Shelly
Cc: Bratcher, Mike, EMNRD
Subject: RE: 30-015-36079 Notice of Release
Attachments: North Pole Federal TB C-141.pdf

Attached is the updated C-141, let me know if you need anything else.

Thanks,
Matt

From: Weaver, Crystal, EMNRD [mailto:Crystal.Weaver@state.nm.us]
Sent: Wednesday, March 28, 2018 9:19 AM
To: Matt Buckles; Tucker, Shelly
Cc: Bratcher, Mike, EMNRD
Subject: RE: 30-015-36079 Notice of Release

Hey Matt,

On the bottom left hand side of the C-141 we need your or someone from Mack's signature, date, printed name, email and title please. I can not process the form without that portion filled out.

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: Matt Buckles [mailto:mattbuckles@mec.com]
Sent: Thursday, March 22, 2018 3:17 PM
To: Tucker, Shelly <stucker@blm.gov>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Subject: RE: 30-015-36079 Notice of Release

Attached is the initial C-141 for the North Pole TB release and an map outlining the affected area. Let me know if you have any questions.

Thanks
Matt Buckles

From: Tucker, Shelly [<mailto:stucker@blm.gov>]
Sent: Thursday, March 22, 2018 10:23 AM
To: Matt Buckles
Cc: mike.bratcher@state.nm.us
Subject: Re: 30-015-36079 Notice of Release

Thank you for the notification. Bruce Boeke and I spoke today and said you had been in contact with him. As soon as you have a C-141 and the impacted area mapped, send it my way please.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Shelly J Tucker
Environmental Protection Specialist
O&G Spill/Release Coordinator

Bureau of Land Management
620 E. Greene St
Carlsbad, NM 88220

575.234.5905 - Direct
575.361.0084 - Cellular
575.234.6235 - Emergency Spill Number

stucker@blm.gov

The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. In such an event that the location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until the contaminant issues are fully mitigated and the location is successfully reclaimed. In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

Confidentiality Warning: This message along with any attachments are intended only for use of the individual or entity to which it is addressed and may contain information that is privileged or confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately.

On Wed, Mar 21, 2018 at 7:42 PM, Matt Buckles <mattbuckles@mec.com> wrote:
Mike and Shelly,

We had a release this morning on Mack Energy's North Pole Federal TB. The clean out plate on the heater treater developed a small leak and with the help of the wind covered an area behind the battery to the North. I went out and used a GPS to map out the release site. We did use a backhoe to clean up any standing oil and will haul off to an approved disposal site. Will gather all the data and submit a c-141 shortly.

Thanks,
Matt Buckles

Bratcher, Mike, EMNRD

From: Matt Buckles <mattbuckles@mec.com>
Sent: Wednesday, March 21, 2018 7:42 PM
To: Bratcher, Mike, EMNRD; stucker@blm.gov
Subject: 30-015-36079 Notice of Release

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Thanks,
Matt Buckles
Mack Energy
575 703 1958