

3R – 469

C-141

12 / 09 / 2015

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 Report ☐ Final Report

Name of Company: BP	Contact: Steve Moskal
Address: 200 Energy Court, Farmington, NM 87401	Telephone No.: 505-326-9497
Facility Name: Mudge LS 006	Facility Type: Natural gas well

Surface Owner: Federal	Mineral Owner: Federal	API No. 3004510843
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LOCATION OF RELEASE

Unit Letter A	Section 11	Township 31N	Range 11W	Feet from the 1,033	North/South Line South	Feet from the 869	East/West Line West	County: San Juan
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Latitude 36.90884 Longitude -107.96561

NATURE OF RELEASE

Type of Release: condensate and produced water	Volume of Release: Unknown	Volume Recovered: none
Source of Release: Flow line and BGT	Date and Hour of Occurrence: unknown	Date and Hour of Discovery: August 8, 2014; 1:30 PM
Was Immediate Notice Given? ☐ Yes ☒ No ☐ Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
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.* During construction operations to replace the onsite BGTs impacted soil was discovered. The impacted soil was excavated and transported off site for landfarm treatment. To date approximately 6,000 yards³ have been removed from the site. Groundwater monitoring wells were installed and sample results received on July 1, 2015 confirmed impacts. A complete remediation plan will be submitted and executed.

Describe Area Affected and Cleanup Action Taken.* Onsite hydrocarbon impacted soil was excavated. The excavated soil comprising of approximately 6,000 cubic yards were removed from the site. Impacted soil remaining offsite will be remediated by active in-situ remediation. Three monitoring wells are currently onsite with additional wells to be installed at another date. A complete Form C-138s area attached. A final C-141 will be submitted upon site closure.

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: 		<u>OIL CONSERVATION DIVISION</u>	
Printed Name: Steve Moskal		Approved by Environmental Specialist:	
Title: Field Environmental Coordinator		Approval Date:	Expiration Date:
E-mail Address: steven.moskal@bp.com		Conditions of Approval:	Attached ☐
Date: December 9, 2015 Phone: 505-326-9497			

* Attach Additional Sheets If Necessary

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Form C-138
Revised August 1, 2011

*Surface Waste Management Facility Operator
and Generator shall maintain and make this
documentation available for Division inspection.

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. Generator Name and Address: BP America Production Co. 200 Energy Ct. Farmington, NM 87401
2. Originating Site: Mudge LS 6
3. Location of Material (Street Address, City, State or ULSTR): QRT/QRT: SW/SW Unit: M Section: 11 T31N R11W
4. Source and Description of Waste: hydrocarbon/condensate impacted soil from historical release on location Estimated Volume <u>290</u> yd ³ / bbls Known Volume (to be entered by the operator at the end of the haul) <u>290</u> yd ³ / bbls <i>11/16/14 - 200cy</i> <i>11/15/14 - 390cy</i>
5. GENERATOR CERTIFICATION STATEMENT OF WASTE STATUS I, Courtney Cochran <i>[Signature]</i> representative or authorized agent for BP America Production Company do hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's Ju regulatory determination, the above described waste is: (Check the appropriate classification) ☒ RCRA Exempt: Oil field wastes generated from oil and gas exploration and production operations and are not mixed with exempt waste. Operator Use Only: Waste Acceptance Frequency ☒ Monthly ☐ Weekly ☐ Per Load ☐ RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous characteristics established in RCRA regulations, 40 CFR 261.21-261.24, or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous (the appropriate items) ☐ MSDS Information ☐ RCRA Hazardous Waste Analysis ☒ Process Knowledge ☐ Other (Provide description in Box) GENERATOR 19.15.36.15 WASTE TESTING CERTIFICATION STATEMENT FOR LANDFARMS Courtney Cochran <i>[Signature]</i> representative for BP America Production Company authorize IET to complete the re testing/sign the Generator Waste Testing Certification. I, K. Selph <i>[Signature]</i> representative for IET do hereby certify that representative samples of the oil field waste have been subjected to the paint filter test and tested for chloride content and that the results have been found to conform to the specific requirements applicable to landfarms pursuant to Section 15 of 19.15.36 NMAC. The following documentation is attached to demonstrate the above-described waste conform to the requirements of Section 15 of 19.15.36 NMAC.
5. Transporter: <i>F # 117</i>

OCD Permitted Surface Waste Management Facility

Name and Facility Permit #: JFJ Landfarm/Industrial Ecosystem, Inc. Permit # NM-01-0010B

Address of Facility: #49 CR 3150 Aztec, NM.

Method of Treatment and/or Disposal:

☐ Evaporation ☐ Injection ☐ Treating Plant ☒ Landfarm ☐ Landfill ☐ Other

Waste Acceptance Status:

☒ APPROVED

☐ DENIED (Must Be Maintained As Permanent Record)

PRINT NAME:

K. Selph

TITLE:

Clerk

DATE:

11-4-14

SIGNATURE:

K. Selph

TELEPHONE NO.:

632-1782

10/31/14

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documentation available for Division inspection.

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Revised August 1, 2011

OVER →

10/17/14 250cy

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. Generator Name and Address:	BP America Production Co. 200 Energy Ct. Farmington, NM 87401	10/20/14 - 450cy	10/15/14 - 520cy
2. Originating Site:	Mudge LS 6	10/23/14 - 260cy	10/14/14 - 496cy
3. Location of Material (Street Address, City, State or ULSTR):	QRT/QRT: SW/SW Unit: M Section: 11 T31N R11W	10/22/14 - 390cy	10/9/14 - 70cy
4. Source and Description of Waste:	hydrocarbon/condensate impacted soil from historical release on location	10/21/14 - 430cy	10/8/14 - 600cy
Estimated Volume	yd ³ / bbls	Known Volume (to be entered by the operator at the end of the haul)	300 (yd) / bbls

5. GENERATOR CERTIFICATION STATEMENT OF WASTE STATUS
I, Courtney Cochran, representative or authorized agent for BP America Production Company do hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination, the above described waste is: (Check the appropriate classification)

☒ RCRA Exempt: Oil field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste. Operator Use Only: Waste Acceptance Frequency ☒ Monthly ☐ Weekly ☐ Per Load

☐ RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste characteristics established in RCRA regulations, 40 CFR 261.21-261.24, or listed hazardous waste as defined in 40 CFR 261.21, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. Check the appropriate items)

☐ MSDS Information ☐ RCRA Hazardous Waste Analysis ☒ Process Knowledge ☐ Other (Provide description)

GENERATOR 19.15.36.15 WASTE TESTING CERTIFICATION STATEMENT FOR LANDFARMS

Courtney Cochran, representative for BP America Production Company authorize IET to complete and testing/sign the Generator Waste Testing Certification.

I, H. Solph, representative for IET do hereby certify that representative samples of the oil field waste have been subjected to the paint filter test and tested for chloride content and the results have been found to conform to the specific requirements applicable to landfarms pursuant to Section 15 of 19.15.36 NMAC. The results of the representative samples are attached to demonstrate the above-described waste conform to the requirements of Section 19.15.36 NMAC.

5. Transporter:

OCD Permitted Surface Waste Management Facility

Name and Facility Permit #: BP America (Amoco Crouch Mesa Land-farm) NM-02-003

Address of Facility: #49 CR 3150 Aztec, NM.

Method of Treatment and/or Disposal:

☐ Evaporation ☐ Injection ☐ Treating Plant ☒ Landfarm ☐ Landfill ☐ Other

Waste Acceptance Status:

☒ APPROVED

☐ DENIED (Must Be Maintained As Permanent Record)

PRINT NAME: L. machaello

TITLE: Admin Specialist DATE: 10-6-14

SIGNATURE: [Signature]

TELEPHONE NO.: 505-632-1782

9-24-14

10/28/14
450cy

10/29/14
370cy

10/30/14
130cy