From: Smith, Cory, EMNRD
To: Kandis Roland; Kelly, Jonathan, EMNRD
Cc: Cheryl Weston
Subject: RE: [EXTERNAL] Compliance issues in T28-27N R7-6W 30-039-25632 SJ 28-6 Unit 213M
Date: Friday, January 15, 2021 10:07:00 AM

All,

OCD has Reviewed BGT on file, Operator filed in error, OCD Concurs based on well file/photos/inspections review. BGT Closed at Operators request no further action required.

Please keep this email for your records as a hard copy will not be sent to you.

Cory Smith • Environmental Specialist
Environmental Bureau
EMNRD - Oil Conservation Division
1000 Rio Brazos | Aztec, NM 87410
505.334.6178 x115 | Cory.Smith@state.nm.us
http://www.emnrd.state.nm.us/OCD/

From: Kandis Roland <kroland@hilcorp.com>
Sent: Tuesday, January 12, 2021 11:33 AM
To: Kelly, Jonathan, EMNRD <Jonathan.Kelly@state.nm.us>; Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
Cc: Kandis Roland <kroland@hilcorp.com>; Cheryl Weston <cweston@hilcorp.com>
Subject: [EXT] FW: [EXTERNAL] Compliance issues in T28-27N R7-6W 30-039-25632 SJ 28-6 Unit 213M

Cory/Jonathan,

BGT permit was filed for the SJ 28-6 Unit 213M well ConocoPhillips in 2008 but no BGT is onsite currently or historically. Prior OCD inspection did not indicate the presence of a BGT as found by Jonathan Kelly.

HEC would like to request C-144 BGT permit be closed has it was submitted by clerical error.

Thanks,

Kandis Roland
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San Juan South Regulatory
505.324.5149
kroland@hilcorp.com

From: Kelly, Jonathan, EMNRD [mailto:Jonathan.Kelly@state.nm.us]
Sent: Monday, November 30, 2020 7:39 AM
To: Farmington Regulatory Techs <FarmingtonRegulatoryTechs@hilcorp.com>
Cc: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
Subject: [EXTERNAL] Compliance issues in T28-27N R7-6W

Good morning,

I hope everyone had a good Thanksgiving. Last Wednesday while inspecting in T28-27N R7-6W I encountered the following compliance issues. Compliance is due 3/1/2021.

cJK2033525604 - [30-039-30098] SAN JUAN 28 7 UNIT #226F – Signs of recent below grade tank overflow indicates that high level shut off is not in proper working order as required by 19.15.17 NMAC.
cJK2033525642 - [30-039-30098] SAN JUAN 28 7 UNIT #226F - Staining down east (separator) side of below grade tank with unknown small standing volume of fluids in containment indicates tank has recently overflowed, current tank level is approximately 24" from tank rim, release needs to be properly addressed per 19.15.17 NMAC. Called into operator while on location.
cJK2033525702 - [30-039-07223] SAN JUAN 28 7 UNIT #010 - Well sign is faded to a point where it mostly illegible from 50 ft as required by 19.15.16.8 NMAC.
cJK2033525809 - [30-039-25661] SAN JUAN 28 7 UNIT #227M - Below grade tank has a measurable layer of hydrocarbon on tank contents.
cJK2033525859 - [30-039-26959] SAN JUAN 28 7 UNIT #227G - Below grade tank is not set level as required by 19.15.17 NMAC, tank dips to the northwest.
cJK2033525974 - [30-039-25043] SAN JUAN 28 6 UNIT NP #464 - Below grade tank is not set level as required by 19.15.17 NMAC.
cJK2033526947 - [30-039-25730] SAN JUAN 28 6 UNIT #132M - Below grade tank exhibits signs of a minor overspray issue, minor staining at base on the northeast and northwest sides of tank, source needs to be eliminated and impacts handled per 19.15.29 NMAC.
cJK2033526985 - [30-039-25730] SAN JUAN 28 6 UNIT #132M - Location has a steel single wall single bottom below grade tank with base not visible.
cJK2033527030 - [30-039-25730] SAN JUAN 28 6 UNIT #132M - Below grade tank has a measurable layer of hydrocarbon on tank contents.
cJK2033527070 - [30-039-25730] SAN JUAN 28 6 UNIT #132M - Chicken wire covering approximately 10" hole in expanded metal below grade tank cover has come lose and needs repaired or replaced.
cJK2033527117 - [30-039-29330] SAN JUAN 28 6 UNIT #132N - Expanded metal below grade tank cover has 2 large damaged areas that need to be repaired to comply with 19.15.17 NMAC.
cJK2033527188 - [30-039-29426] SAN JUAN 28 6 UNIT #132P - Below grade tank has lost integrity at the base on northwest side, soils saturated beneath the leak and partially around the rest of the base, called into operator while on location and requested notification once tank has been emptied. Impacts will need to be properly handled per 19.15.29 NMAC. - 3:45 pm, received call from operator updating me that the below grade tank has been emptied and the well shut in until they can take appropriate actions for the integrity loss.
cJK2033527284 - [30-039-29426] SAN JUAN 28 6 UNIT #132P - Location has heavy dry weeds in tank containment.
cJK2033527330 - [30-039-26256] SAN JUAN 28 6 UNIT #147N - Location has heavy dry weeds around well head and in tank containment.

Additionally, I found the following C-144 issues.

[30-039-20997] SAN JUAN 28 7 UNIT #226	11/25/2020	No C-144 below grade tank registration in well file.
[30-039-25661] SAN JUAN 28 7 UNIT #227M	11/25/2020	No C-144 below grade tank registration in well file.
[30-039-26959] SAN JUAN 28 7 UNIT #227G	11/25/2020	No C-144 below grade tank registration in well file.
[30-039-25632] SAN JUAN 28 6 UNIT #213M	11/25/2020	C-144 below grade tank registration in well file, no below grade tank on location, will review and send to operator to determine path forward.

Please email me notification with photos of the corrected items to help expedite clearing the compliance. All well related correspondence must include the API number to the referenced location, any received compliance emails that do not include the API number will not be accepted for Compliance closure. Any replacement well signs should be appropriately located on location and follow requirements of 19.15.16.8 NMAC and other applicable regulatory agency requirements with information complete and correct. If you have any questions regarding any of the above items, please do not hesitate to contact me.

For field compliance issues that may be delayed due to the public health emergency please contact your OCD field representative prior to the expiration date and request an extension. Include the reason for the delay and the estimated extension timeframe being requested.

Thank you,

Jonathan D. Kelly
Compliance Officer
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Energy, Minerals, & Natural Resources
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