<u>District I</u> 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

NMOCD Form C-141 Revised August 8, 2011 Revised August 8, 2011
Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

						OPERA	ГOR						
Name of Company: BP						Contact: Steve Moskal							
Address: 380 Airport Road, Durango, CO 81303						Telephone No.: 505-330-9179							
Facility Name: Cedar Hill 10" Pipeline – Valentine GC 1M						Facility Type: Natural gas well							
Surface Own	ner: State	wner: S	State API No. 3004533					218					
				LOCA	TION	OF REI	LEASE						
Unit Letter C	t Letter Section Township Range 10W Feet from the North North					South Line	Feet from the 1,600	East/West Line East		County: San Juan			
Latitude 36.947100° Longitude -108.906628°													
NATURE OF RELEASE													
Type of Release: Produced water							Volume of Release: unknown Volume Recovered: none						
Source of Release: Pipeline corrosion										Date and Hour of Discovery: 9/2/15; 3:00			
Was Immediate Notice Given?							unknown PM If YES, To Whom?						
✓ Yes ☐ No ☐ Not Required													
By Whom? Steve Moskal; BP						Date and Hour: 9/3/15; 4:25 PM							
Was a Watercourse Reached?							If YES, Volume Impacting the Watercourse.						
☐ Yes ☒ No													
If a Watercourse was Impacted, Describe Fully.*													
Release occurred in an erosional feature of a tributary of Cox Canyon wash. Contents did not reach the water course as only gas was released.													
Describe Cause of Problem and Remedial Action Taken.* Engineer found release during field work assessment of pipeline integrity management project. Engineer reported to operations team. Pipeline was shut in pending repairs and remediation.													
Describe Area Affected and Cleanup Action Taken.* The pipeline was excavated. During excavation, it was determined that the gas pipeline had a pinhole leaking gas directly to the atmosphere with no soil or water impacts. The pipeline had been exposed in the area due to natural erosion. No sampling was													
performed. The pipeline erosion was then corrected by an extensive erosion mitigation project.													
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: Muse							OIL CONSERVATION DIVISION						
						Approved by Environmental Specialist:							
Title: Field Environmental Coordinator							Approval Date: 4/10/18 Expiration Date:						
E-mail Address: steven.moskal@bp.com						Conditions of Approval:				Attached			
Date: March 12, 2018 Phone: 505-330-9179													
Attach Addit	Attach Additional Sheets If Necessary # WCS 15 287300 54												



Smith, Cory, EMNRD

From:

Moskal, Steven <Steven.Moskal@bp.com>

Sent:

Monday, April 9, 2018 9:13 AM

To:

Smith, Cory, EMNRD

Cc:

Fields, Vanessa, EMNRD

Subject:

RE: Cedar Hill 10" Pipeline - Valentine GC 1M 9/2/15

Attachments:

IMG_0022.JPG; IMG_0013.JPG; IMG_0014.JPG; IMG_0015.JPG; IMG_0019.JPG; IMG_

0020.JPG; IMG_0021.JPG

Cory – Attached are a few photos of the release point on the Cedar Hill 10" pipeline. There was an error in initial reporting in that there was no actual leak. Once the pipeline was excavated, it was determined that there was no gas or water leak. No liquids were evident surrounding the pipeline, but due to the erosional features, stormwater had been following the pipeline via "wormholes." The pipeline was extensively excavated and inspected for approximately 30' from each side of the suspected release point with no release identified. The saturated soil in the photos is from the stormwater which created a worm hole that followed the pipeline. There was no impacted soils encountered and no soil was exported offsite. The remediation plan to the SLO mentioned impacted soil, but was only an estimate at the time of discovery.

Steve Moskal

BP Lower 48 – San Juan Field Environmental Coordinator Phone: (505) 330-9179



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From: Smith, Cory, EMNRD [mailto:Cory.Smith@state.nm.us]

Sent: Monday, March 26, 2018 9:06 AM

To: Moskal, Steven

Cc: Fields, Vanessa, EMNRD

Subject: RE: Cedar Hill 10" Pipeline - Valentine GC 1M 9/2/15

Steve,

OCD received the final C-141 on March 15, 2018. There is some confusion as to what happened at this site. BP initial C-141 for this incident indicated the contents did not reach a water course, and that soil samples will be collected to determine extent of required remediation. In the Reclamation plan for the State Land Office it indications that BP was to remove 100 square feet of Impacted soils. Were any of the soil samples collected? How did BP determine that no liquids were released in the area as suggested in the initial C-141? Does BP have any pictures of the initial release response?

Cory Smith Environmental Specialist Oil Conservation Division Energy, Minerals, & Natural Resources 1000 Rio Brazos, Aztec, NM 87410 (505)334-6178 ext 115 cory.smith@state.nm.us

From: Moskal, Steven [mailto:Steven.Moskal@bp.com]

Sent: Monday, March 12, 2018 9:30 AM

To: Smith, Cory, EMNRD < Cory.Smith@state.nm.us>

Cc: Fields, Vanessa, EMNRD < Vanessa. Fields@state.nm.us > Subject: RE: Cedar Hill 10" Pipeline - Valentine GC 1M 9/2/15

Cory – This release was only gas and vented directly to the atmosphere due to the pipeline being uncovered by natural erosion. The erosion was corrected. Attached is a final C-141. I will deliver a hard copy to your office as well.

Thank you,

Steve Moskal

BP Lower 48 – San Juan Field Environmental Coordinator

Phone: (505) 330-9179



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From: Smith, Cory, EMNRD [mailto:Cory.Smith@state.nm.us]

Sent: Monday, March 12, 2018 8:10 AM

To: Moskal, Steven

Cc: Fields, Vanessa, EMNRD

Subject: Cedar Hill 10" Pipeline - Valentine GC 1M 9/2/15

Steve.

I have a open incident for the Cedar Hill 10" Pipeline - Valentine GC 1M 9/2/15 incident #ncs1528730054 do you happen to know the status of the site?

Thanks,

Cory Smith
Environmental Specialist
Oil Conservation Division
Energy, Minerals, & Natural Resources
1000 Rio Brazos, Aztec, NM 87410
(505)334-6178 ext 115
cory.smith@state.nm.us



