30-015-28

State of New Mexico **Energy Minerals and Natural Resources**

Oil Conservation Division 1220 South St. Francis Dr.

	Distant, Status	-	_	_		
RE	C	FPH DER HRS	Sector Sector	V	E	Ľ

Form C-141 Rev ised October 10, 2003

SEP 1 5 2011 Submit 2 Copies to appropriate

NMOCD ARTESTAL Office in accordance h Rule 116 on back

side of form

Final Report

Santa Fe, NM 87505 Santa Fe, NM 87505												
20-015-	28100	2	Rele	ease Notific	ation	and Co	orrective A	ction				
AMLB/135334597						OPERAT	ſOR	🖂 Initial Report 🗌				
						Contact: Joe Hernandez						
						Telephone No.: 575-942-8675						
Facility Nar	ne: J.L. Ko	eel B Tank E	attery- V	Vell #56	Ĩ	Facility Typ	e: Oil and Gas I	Product	ion Tank	Battery		
Surface Ow	ner: BLM			Mineral O	wner: I	BLM			Lease N	No.: LC-02	9435-B	
				LOCA	TION	N OF REI	LEASE					
Unit Letter D	Section 8	Township 17S	Range 31E	Feet from the 1280	North/				West Line County W		Eddy	
	,					3 Longitude	e: -103.895982			<u> </u>		
Type of Release: Oil & Produced Water					Volume of Release: 48 Volume Recovered				Recovered: 4	15		
Source of Release: Corroded 4 x 3 pipe swedge					Date and Hour of Occurrence: Date and Hour of Disc 08/31/11 - 1600 18/31/11 - 1630				covery:			
Was Immediate Notice Given?					If YES, To Whom? d T. Gregston, BLM - M. Bratcher, OCD							
By Whom?					Date and Hour: 09/01/11 - 0700							
Was a Watercourse Reached?					If YES, Volume Impacting the Watercourse.							

If a Watercourse was Impacted, Describe Fully.*:

Describe Cause of Problem and Remedial Action Taken.*: 4" x 3" pipe swedge corroded releasing product into the tank battery contianment and previously excavated areas. Leak was isolated and the corroded swedge rmeoved and replaced.

Describe Area Affected and Cleanup Action Taken.*: Pending BLM conditions and additional investigation by LINN. Further detailed corrective action to be submitted.

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:	OIL CONSERVATION DIVISION Signed By Mile Beaming Approved by District Supervisor:					
Title: Foreman E-mail Address: jhernandez@linneenrgy.com	DEC 1 9 2011 Approval Date: Expiration Conditions of Approval	on Date:				
Date: Phone: 575-738-1739	 Remediation per OCD Rules & 					
* Attach Additional Sheets If Necessary	Guidelines. SUBMIT REMEDIATION PROPOSAL NOT LATER THAN: i/19/2012	2RP-974 (LA RE ENTRY)				

Bratcher, Mike, EMNRD

From:	Fred Holmes [fred@etechenv.com]
Sent:	Thursday, September 15, 2011 11:49 AM
То:	Bratcher, Mike, EMNRD; tgregsto@blm.gov
Cc:	'Daniel Frick'; 'Ron Ragland'; 'Joe Hernandez'
Subject:	Keel Battery Initial C-141 Amendment
Attachments:	JL Keel Well 56 Tank Battery Initial C-141 091411.pdf

Mike & Terry:

Please find attached an amended C-141 to associate the Keel Tank Battery with the J.L. Keel Well 56. The site coordinates are still applicable to the battery site.

Respectfully:

Fred Holmes <u>Etech Environmental & Safety Solutions, Inc.</u> P.O. Box 8469 Midland, Texas 79708-8469 Phone: 432-563-2200 Fax: 432-563-2213 E-mail: <u>fred@etechenv.com</u>

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Bratcher, Mike, EMNRD

From:
Sent:
To:
Subject:

Gregston, Terry G [tgregsto@blm.gov] Wednesday, September 14, 2011 6:12 PM Fred Holmes; Bratcher, Mike, EMNRD RE: LINN Energy - Keel B Tank Battery Initial C-141

Mr. Holmes,

I have received your C141 spill report for the J L Keel B Tank Battery spill. As noted in the email, this is third spill in the tank battery following the same footprint. Two prior efforts to clean up the two prior spills have been made, with each subsequent spill flowing into the newly excavated areas.

A BLM onsite with Linn Operating personnel on 09/02/11 discussed the issue of multiple spills at this tank battery. Linn has plans in the works to upgrade this facility, beginning with the replacement of three of the tanks in the battery. Due to obvious signs of tank leakage on the tanks involved (tanks are currently empty to prevent further leakage prior to replacement), the BLM endorses such a plan of action. The question was raised during the onsite about whether or not Linn had any plans to clean up under the old tanks before setting the new tanks in place; Linn does plan to do addition cleanup prior to setting new tanks. In light of the tank replacements to take place in the near if not immediate future, BLM is amenable to waiving further work on spill cleanup until the new tanks are ready to be set. The thought behind this being that a better and more thorough, not to mention easier, cleanup can be achieved without having to work around the old tanks. The new tanks are on order according to Linn personnel.

Linn will need to coordinate the proposed cleanup action plan with the OCD and obtain like approval for proposed cleanup actions.

Terry Gregston Environmental Protection Specialist Bureau of Land Management 620 E. Greene St. Carlsbad, NM 88220 Office (575) 234-5958 Cell (575) 361-2635 Fax (575) 234-5927

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From: Fred Holmes [mailto:fred@etechenv.com] Sent: Wednesday, September 14, 2011 1:16 PM To: 'Bratcher, Mike, EMNRD'; Gregston, Terry G Subject: LINN Energy - Keel B Tank Battery Initial C-141

Mike & Terry:

Attached is the initial C-141 for the LINN Energy, J.L. Keel B Tank Battery Release. LINN is currently evaluating several corrective actions for this site as there have been repeated releases at the facility. Consequently no corrective action

plan (CAP) is being submitted at this time. However, there should be a proposed CAP to you both by Monday or Tuesday of next week. A photograph log and site map are attached for your files.

I appreciate your patience on this issue as LINN is working diligently to put a comprehensive plan together to make sure the issues associated with the releases at this are properly corrected.

Respectfully:

Fred Holmes

Etech Environmental & Safety Solutions, Inc.

P.O. Box 8469 Midland, Texas 79708-8469 Phone: 432-563-2200 Fax: 432-563-2213 E-mail: <u>fred@etechenv.com</u>

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Bratcher, Mike, EMNRD

From: Sent: To: Subject: Attachments:	Fred Holmes [fred@etechenv.com] Wednesday, September 14, 2011 1:16 PM Bratcher, Mike, EMNRD; tgregsto@blm.gov LINN Energy - Keel B Tank Battery Initial C-141 JL Keel Tank Battery Initial C-141 091411.pdf; JL Keel Tank Battery Photo Log 091211.pdf; JL Keel B TB Assessment Map.pdf
Categories:	Red Category

Mike & Terry:

Attached is the initial C-141 for the LINN Energy, J.L. Keel B Tank Battery Release. LINN is currently evaluating several corrective actions for this site as there have been repeated releases at the facility. Consequently no corrective action plan (CAP) is being submitted at this time. However, there should be a proposed CAP to you both by Monday or Tuesday of next week. A photograph log and site map are attached for your files.

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Respectfully:

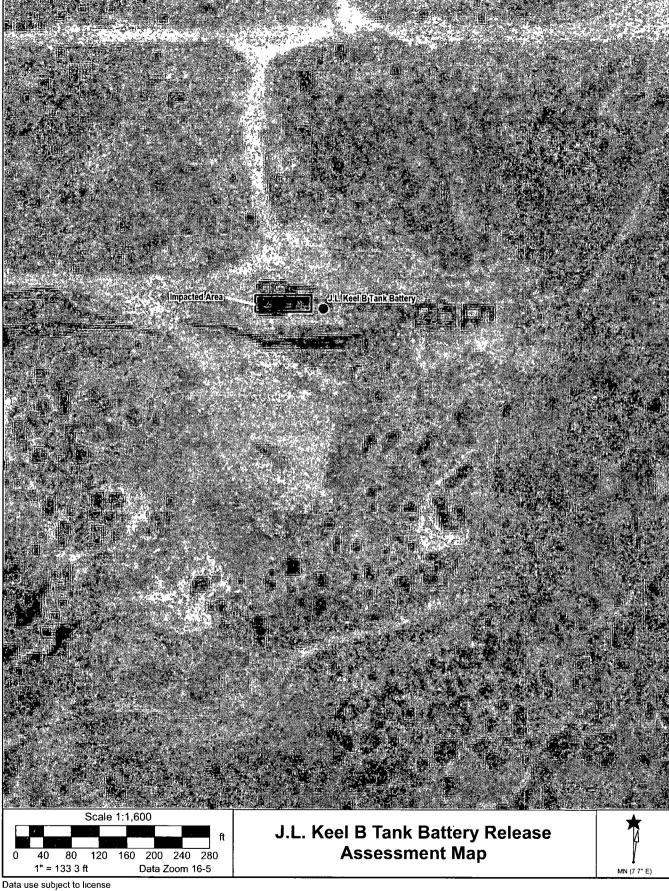
Fred Holmes

Etech Environmental & Safety Solutions, Inc. P.O. Box 8469 Midland, Texas 79708-8469 Phone: 432-563-2200 Fax: 432-563-2213 E-mail: fred@etechenv.com

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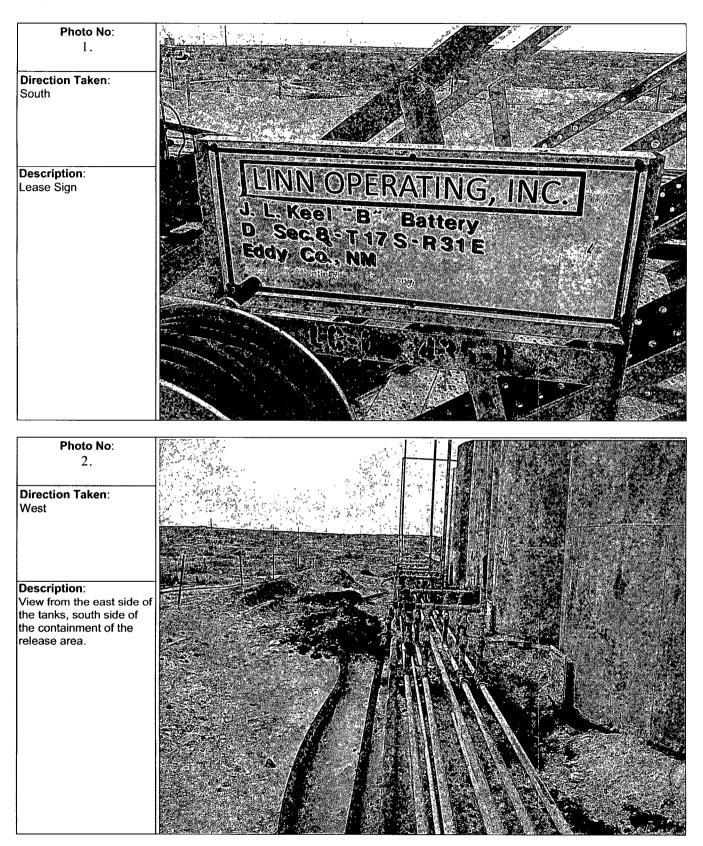
DELORME



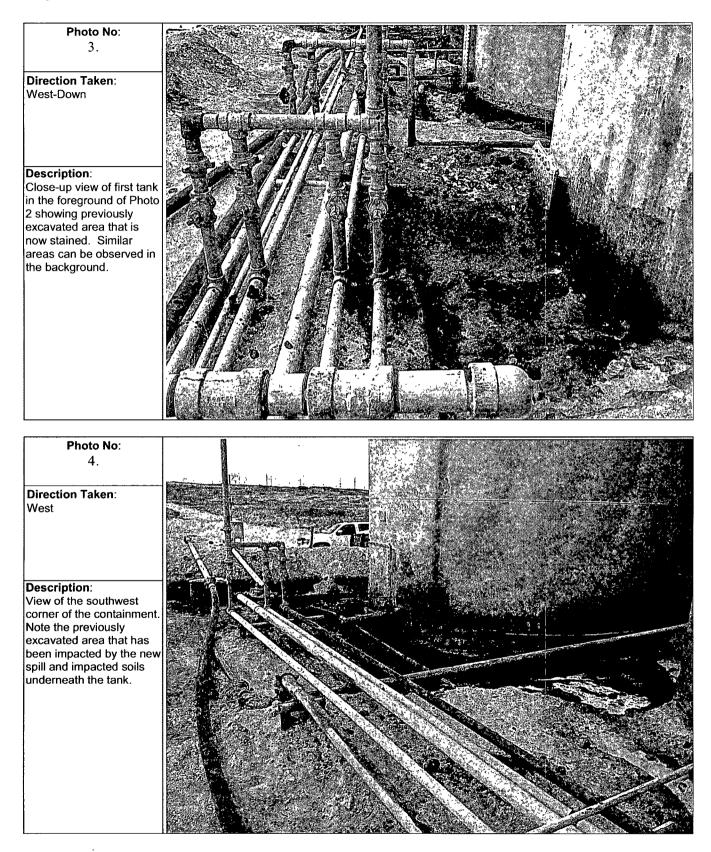
© DeLorme XMap® 7 www.delorme.com

Project Name: J.L. Keel "B" Tank Battery Project No: 253-2971-000

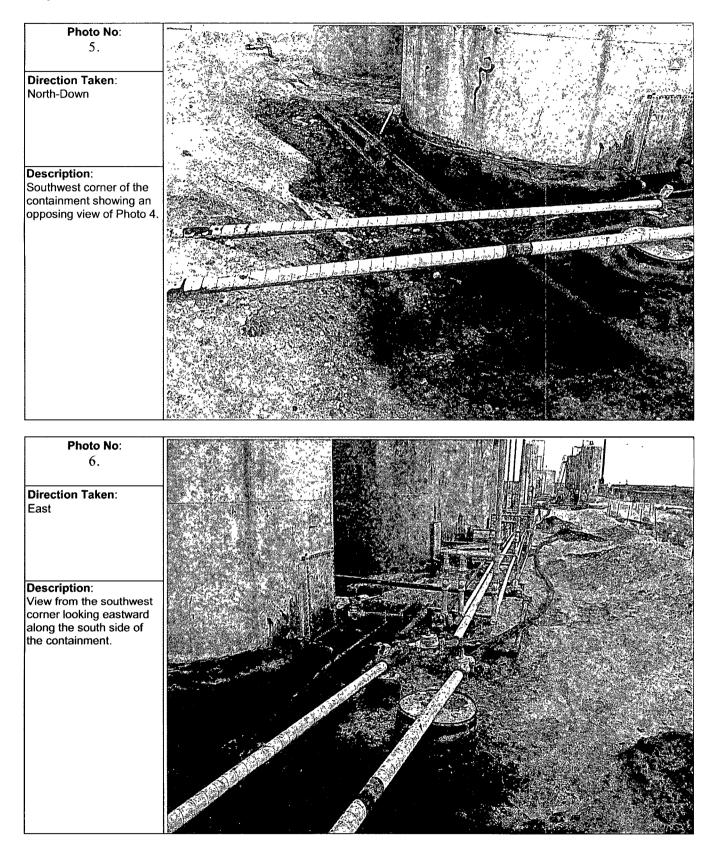
Photograph Log Date Taken: 09/12/11



Project Name: J.L. Keel "B" Tank Battery Project No: 253-2971-000



Project Name: J.L. Keel "B" Tank Battery Project No: 253-2971-000



<u>District I</u> 1625 N. French I <u>District II</u> 1301 W. Grand 4						New Mex: and Natura	ico 1 Resources	Form C-141 Revised October 10, 2003				
<u>District III</u> 1000 Rio Brazos <u>District IV</u> 1220 S St. France	Road, Azter	c, NM 87410		Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505				/	/	Submit 2 C District (wi	Copies to Office in th Rule	o appropriate n accordance 116 on back side of form
		·	\ \ Polo	ase Notific				otion		·		
			, inch		auor	OPERAT		1	_	al Report		Final Report
Name of Co			OPERATOR / Maintail Report Final Report									
Address: 21				M		Telephone No.: 575-942/8675 Facility Type: Oil and Gas Production Tank Battery						
Facility Nan			Sattery	<u>\</u>			e: Oil and Gas	Product			<u> </u>	
Surface Own	ner: BLM			<u>Mineral C</u>	wner:	BLM	/		Lease N	No.:		
		-				N OF REI	······					
Unit Letter D	Section 8	Township 17S	Range 31E	Feet from the	North	/South Line	Feet from the	East/W	Vest Line	County	Eddy	,
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				NAT	URE	OF REL	EASE					
		Produced Wat		<u> </u>		Volúme of Release: 48 Volume Recovered: 45						
Source of Rel	lease: Corro	oded 4 x 3 pip	e swedge				Date and Hour of Occurrence: Date and Hour of Discovery: 08/31/11 - 1600 18/31/11 - 1630					
Was Immedia	ate Notice (Yes [] No 🗌 Not Ro	equired/	/ If YES, To		tcher, O				
By Whom?					· X		Hour: 09/01/11 - 0					
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Signature:		n [] <u>- saitsenne - (</u>)	et en el			OIL CONSERVATION DIVISION						
Printed Nam	Printed Name: Jose Hernandez					Approved by District Supervisor:						

Printed Name: Jose Hernandez		
Title: Foreman	Approval Date:	Expiration Date:
E-mail Address: jhernandez@linneenrgy.com Date: Phone: 575-738-1739	Conditions of Approval:	Attached
Date. Fiblic. 575-758-1759		

1

* Attach Additional Sheets If Necessary