

## Bratcher, Mike, EMNRD

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**From:** Amanda Trujillo [atrujillo@yatespetroleum.com]  
**Sent:** Thursday, March 10, 2011 2:48 PM  
**To:** Bratcher, Mike, EMNRD  
**Cc:** Jerry Fanning  
**Subject:** RE: Release Report- 10" polyline Medano Waterline

Mr. Bratcher:

While ditching a line for a high pressure gas line, workers contracted by Devon Energy hit a YPC 10" poly line carrying produced water. Approximately 200 bbls produced water was released running down the freshly dug trench to the bottom of a hill where it pooled. Samples were taken and it was determined the section of trench approximately a 100 feet long was 2830 ppm TPH over the recommended action limits for a site ranking of zero (0). This one particular TPH reading was the only one out of range. All sampled BTEX readings were within the recommended 50 ppm.

A day-lighting crew was scheduled for the February 15, 2011. Along with the day-lighting crew, a backhoe was also available. Unfortunately, it was soon discovered that the day-lighting truck was too heavy for the sandy soil. A water truck was called in to aid the day-lighting truck.

The trench being excavated needed to be excavated an additional 2 feet from the 6 feet depth where the samples had originally been taken. We were attempting to delineate the extent of the contamination. The trench itself was 2 feet wide and the soil textural class is sand. We soon came to discover there was no safe method to excavate using the day-lighting tools that would keep the workers from getting in the trench. Terracing the excavation was not an option given the proximity to parallel pipelines. Being inside the trench would be considered confined space entry and the trench was not wide enough to safely enter the excavation, nor would the soil stabilize enough. Given these limitations and the proximity to the neighboring lines, the excavation could not continue. Due to the identified safety factors above and the contamination levels being only slightly out of range. We would like to ask for a risk based closure and permission to backfill. Hand delivered earlier today was a copy of the original sample results, a C-141 Final, a diagram of the area, and a copy of the Safety Meeting Form done by the Workers at the job site.

Thank you for your time.

Amanda N. Trujillo  
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-----Original Message-----

**From:** Amanda Trujillo  
**Sent:** Wednesday, December 22, 2010 3:41 PM  
**To:** Jerry Fanning; 'Mike Bratcher ([Mike.Bratcher@state.nm.us](mailto:Mike.Bratcher@state.nm.us))'  
**Cc:** Bob Asher  
**Subject:** RE: Release Report- 10" polyline

Mr. Bratcher:

Attached is the C-141 for the Medano Waterline.

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-----Original Message-----

**From:** Jerry Fanning  
**Sent:** Tuesday, December 21, 2010 2:39 PM  
**To:** 'Mike Bratcher ([Mike.Bratcher@state.nm.us](mailto:Mike.Bratcher@state.nm.us))'  
**Cc:** Bob Asher; Amanda Trujillo  
**Subject:** Release Report- 10" polyline

This email is a follow up to phone notification to you 12-21-2010, 2:23pm.

Ditchers cut 10" poly line carrying produced water from our Livingston Water Disposal system the afternoon of 12-22-2010.

Line released approximately 200 bbls produced water. Line was isolated and repaired.  
C-141 will be submitted within allotted time frame when site assessment is complete.

Jerry D. Fanning, Jr.  
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