

NM OIL CONSERVATION

ARTESIA DISTRICT

DEC 18 2015

Form C-141
Revised August 8, 2011

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, 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

RECEIVED

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

FAB1535533884 Release Notification and Corrective Action

NAB1535534069

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company	Enterprise Field Services LLC	Contact	Alena Polk
	PO Box 4324, Houston, TX 77210	Telephone No.	575-706-4926
Facility Name	Finley Compressor Station	Facility Type	Gas Gathering Station
Surface Owner	Mark Enciso	Mineral Owner	unknown
		Lease No.	NA

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
I	35	25S	28E	35	South	257	East	Eddy

Latitude: 32.449158 Longitude: W-104.149580

NATURE OF RELEASE

Type of Release	Pipeline liquids	Volume of Release	unknown - historical	Volume Recovered	0
Source of Release	Undetermined at this time - assumed to be from corrosion of storage tank operated by 2 entities	Date and Hour of Occurrence	Historical - Unknown	Date and Hour of Discovery	08/21/2015 (non-reportable 2 bbl release)
Was Immediate Notice Given?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?			
By Whom?		Date and Hour			
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	NA		

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

During response actions associated with a non-reportable spill of approx. 2 barrels of condensate/liquid from an Enterprise storage tank on August 21, 2015, historical soil impacts became apparent. At the time of the initial (2 BBL) release, the Enterprise storage tank was isolated and removed from service. Soil excavation commenced to remove the impacted soil. As soil excavation continued it became clear that the visually impacted soil resulted from historic contamination. Preliminary soil sampling from excavation sidewalls indicates that the horizontal and vertical extent of impact has not been determined. Due to the proximity of tanks operated by 3rd party and the condition of 3rd party tanks, Enterprise is coordinating the ongoing effort with the 3rd party. Free liquids have been continually removed from the excavation and fencing and flagging were installed around the excavation to deter wildlife. The next step for investigation will be to determine if the observed fluids in the excavation are groundwater. A proposal for installation of a ground water monitor well will be submitted.

Describe Area Affected and Cleanup Action Taken.*

Remediation actions, to date, have followed the Enterprise Products, General Release Notification, Response and Remediation Plan date March 9, 2015 (the Plan). Further action will be coordinated with the 3rd party and will conform to the Plan. Any proposed actions that are not included in the Plan will be discussed with the NMOCD prior to implementation.

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		
Printed Name: Jon E. Fields	Approved by District Supervisor:	HABER	
Title: Director, Field Environmental	Approval Date: 12/21/15	Expiration Date: N/A	
E-mail Address: jefields@eprod.com	Conditions of Approval:	Attached <input type="checkbox"/>	
Date: 12/18/2015 Phone: 713-381-6684			

2RP-3461

Patterson, Heather, EMNRD

From: Ferguson, Dina <djferguson@eprod.com>
Sent: Friday, December 18, 2015 11:50 AM
To: Bratcher, Mike, EMNRD
Cc: Billings, Bradford, EMNRD; Patterson, Heather, EMNRD; Thompson, Roger; Nolan, Shiver
Subject: RE: Finley Compressor Station Eddy County NM
Attachments: IMG_0513.JPG; IMG_0769.JPG; IMG_0770.JPG; C-141 Form_Finley Compressor Station.pdf; Finley Station.pdf; Figure 3 (2).pdf

Mike and Heather, attached is the C-141 per your request. As indicated in the C-141 and per our discussions, Enterprise is coordinating future response for the discovered historic contamination with Finley Resources. All previous work was done in accordance with the General Response plan developed in conjunction with NMOCD. The next step is to submit an application for installation of a groundwater monitor well that will be located up gradient and used to determine depth to groundwater. A proposal will also be submitted to Mr. Bradford Billings for review.

Regarding the dead raptor, Enterprise was notified last week on Friday by Mr. Ty Allen/USFWS that his field visit identified the presence of the bird in the water. After discussion with Mr. Allen, and on his agreement, Enterprise took action immediately to remove the accumulated water, install fencing, install flagging over the excavation and install "barn owls" as a further deterrent. Photos are attached. Mr. Allen seemed satisfied with Enterprise's action. Additionally, Enterprise has implemented measures to ensure frequent site visits and inspections of the facility to ensure prompt response to any conditions observed at the site.

As discussed before, preliminary soil samples were collected showing impacted soil from hydrocarbon and chlorides. I've attached as summary of the soil sample results and a site diagram.

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

From: Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]
Sent: Thursday, December 17, 2015 5:52 PM
To: Ferguson, Dina
Cc: Billings, Bradford, EMNRD; Patterson, Heather, EMNRD; Thompson, Roger; Nolan, Shiver
Subject: RE: Finley Compressor Station Eddy County NM

Dina,

We need a C-141 sent in on this site, as well as the items listed in my 10/22/15 email, to include a path forward proposal. The excavation, as it stand now, needs to be made more secure by better fencing and netting. A dead hawk has already been discovered in the water there. I will be out of the office over the Holidays, so please copy Ms. Patterson and Mr. Billings with these submittals.

Thank you,

Mike Bratcher
NMOCD District 2
811 S. First Street
Artesia, NM 88210
O: 575-748-1283 X108
C: 575-626-0857
F: 575-748-9720

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

From: Ferguson, Dina [mailto:djferguson@eprod.com]

Sent: Friday, October 23, 2015 3:32 PM

To: Bratcher, Mike, EMNRD

Cc: Billings, Bradford, EMNRD; Patterson, Heather, EMNRD; Thompson, Roger; Nolan, Shiver

Subject: RE: Finley Compressor Station Eddy County NM

Mike, Enterprise has continued to horizontally excavate areas that exhibit visual contamination between rain events. At this time we have no information that confirms ground water contamination but are continuing the excavation efforts. The direction of excavation has been away from the suspected contamination source which is not operated by Enterprise. We have contacted the other producer/operator of the other tanks regarding this continued effort and are working to coordinate the remediation efforts. As mentioned in the previous email, this contamination appears to be historic and not related to the 2 barrel release observed in August 2015. At this time Enterprise does not have enough information to determine if the filing of a C-141 is required.

Enterprise has hauled some impacted soil and water to authorized disposal locations and will provide that documentation next week.

I left a message on your office voice mail to further discuss the field conditions and efforts put forth by Enterprise. I'll try to get back with you next week.

Thanks;
Dina

Sent via the Samsung GALAXY S(r)4, an AT&T 4G LTE smartphone

----- Original message -----

From: "Bratcher, Mike, EMNRD" <mike.bratcher@state.nm.us>

Date: 10/22/2015 5:01 PM (GMT-06:00)

To: "Ferguson, Dina" <djferguson@eprod.com>

Cc: "Billings, Bradford, EMNRD" <Bradford.Billings@state.nm.us>, "Patterson, Heather, EMNRD" <Heather.Patterson@state.nm.us>, "Thompson, Roger" <RThompson@eprod.com>, "Nolan, Shiver" <SNolan@eprod.com>

Subject: RE: Finley Compressor Station Eddy County NM

Dina,

OCD conducted another site inspection at the Finley Compressor Station yesterday, 10/21/15. Please provide a summary of all activities that have been performed at the site to date, to include volumes and disposal information for soil and liquids that have been removed from the site, and, any analytical data that may have been obtained. Also, please submit an Initial Form C-141 for the site. OCD will require an investigation into potential groundwater impact. Bradford Billings with the OCD Santa Fe Environmental Bureau will be the lead contact for that portion of the project.

Thank you,

Mike Bratcher

NMOCD District 2

811 S. First Street

Artesia, NM 88210

O: 575-748-1283 X108

C: 575-626-0857

F: 575-748-9720

From: Ferguson, Dina [mailto:djferguson@eprod.com]
Sent: Monday, October 05, 2015 3:04 PM
To: Bratcher, Mike, EMNRD
Cc: Billings, Bradford, EMNRD; Patterson, Heather, EMNRD; Thompson, Roger; Nolan, Shiver
Subject: RE: Finley Compressor Station Eddy County NM

Mike, the incident you mention below was discovered on August 21 and was a surface release of approximately 2 bbls. I've attached a photo of the discovered release. In the clean-up efforts to respond to the 2 bbl release, Enterprise discovered what appears to be historical contamination. Preliminary samples indicate there is additional excavation needed to complete the clean-up and Enterprise is taking efforts to coordinate with the producer that also has tanks next to the location of our tank. Additionally, this past weekend significant rains occurred and we will have to wait for the ground to stabilize to move forward.

During the excavation efforts, fluid has leached in to the excavated area from the sidewalls. Once the rain dissipates, we will be making efforts to determine the source of the fluids, whether it is contamination leaching in to the hole or groundwater. As Enterprise further determines the details we will make sure to communicate with you and the other stakeholders.

Hopefully this answers your questions, please feel free to contact me at any time. Thanks.

From: Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]
Sent: Monday, October 05, 2015 12:06 PM
To: Ferguson, Dina
Cc: Billings, Bradford, EMNRD; Patterson, Heather, EMNRD
Subject: Finley Compressor Station Eddy County NM

Good Morning Dina,

I was at the Finley Compressor station last Tuesday (9/29/15) as follow up to a phone call we received. There was an excavation in progress due to a tank leak that had been discovered. It looks like they may have encountered some very shallow ground water at the site. Do you have any information on this. The person on site indicated his contact for Enterprise was Thomas Green.

Thanks,

Mike Bratcher
NMOCD District 2
811 S. First Street
Artesia, NM 88210
O: 575-748-1283 X108
C: 575-626-0857
F: 575-748-9720

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