District 1
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aziec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

n

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

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Form C-141 Revised October 10, 2003

Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

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Workplu approval sent to op & SESI

\* Attach Additional Sheets If Necessary

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with Rule 116 on back side of form

B0423149128 ,	<b>OPERATOR</b>	Initial Report 🔲 Final
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\* Attach Additional Sheets If Necessary

Workplu approval sent



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop Cabinet Secretary Mark E. Fesmire, P.E.
Director
Oil Conservation Division

August 18, 2004

Merit Energy PO Box 69 Loco Hills NM 88255

Re: Hudson Federal Tank Battery

A-20-17s-31e

Eddy County, New Mexico

Dear Operator,

O.C.D. has received the Remediation Work plan as prepared by Safety & Environmental Solutions, Inc. and presented by your company.

The Remediation Work plan as presented is approved with the following added stipulations:

- 1. Chloride and/or TPH levels must meet OCD requirements as related to site assessment.
- 2. The work plan as approved shall begin corrective actions no later than 9/3/2004.
- 3. Please notify the Oil Conservation Division 24 hours prior to corrective actions or soil samples being taken to allow an OCD representative to witness actions as needed.

If I can be of assistance in this matter please do not hesitate to contact me at 505-748-1283 Ext 108 (Cell:505-626-0857) or E-mail me at mbratcher@state.nm.us

Sincerely

Mike Bratcher Compliance Officer

NMOCD

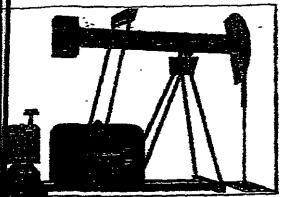
Cc/ Safety & Environmental Solutions, Inc.

703 E. Clinton Suite 102 Hobbs NM 88240

# **FAX COVER SHEET**

OIL CONSERVATION DIVISON 1301 W. GRAND AVE ARTESIA, NM 88210	PHONE (505-748-1283) FAX (505-748-9720) Date 8/16/04/
TO: SESI Ath: Bol Alle FROM: Mike Bratcher Dist. III	2
NUMBER OF PAGES	(INCLUDING COVER SHEET)
MESSAGE MERIT ENERGY HUDSON FED TANK BATTE	ery Recesse 8/11/04

# FAX



## Merit Energy Company P.O. Box 306

P.O. Box 300 2560 F.M. 301 WhiteFace, Texas 79379 Phone: 806-229-6300

Date:		No of Pages:	- (Including Cover Page)
To:	Mike Bradsheer	- From:	Stree Branksinge
-		·····	
Phone #:		Phone #: Fax #:	677-2327

Correction on C-141-Firm sent 8-12-24
it is the Hudson Battery - not Terrer A
sorry for Incorporation

# Merit Energy Hudson Federal Battery Work Plan NE ¼ NE ¼ of Section 20 /8 Township 17S, Range 31E Eddy County, New Mexico

August 13, 2004



Prepared for:

Merit Energy P.O. Box 69 Loco Hills, N.M. 88255

By:

Safety & Environmental Solutions, Inc. 703 E. Clinton Suite 102 Hobbs, New Mexico 88240 PHONE (505) 397-0510; FAX (505) 393-4388 Email: ballen@sesi-nm.com

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I.	Purpose	1
	Background	
	Contaminant and Size of Area	
	Vertical and Horizontal Extent of Contamination	
	Groundwater	
	Action Plan	
	Figures & Appendices	

#### I. Purpose

The purpose of this work plan is to propose a remedial course of action for a crude oil release associated with the Merit Energy "Hudson Federal Tank Battery" site. The site is located in the NE corner of Section 18 Township 17S Range 31E, Eddy County, New Mexico. The crude oil release at this location is contained within the battery firewall excepting a moderate overspray area south of the battery.

#### II. Background

The active tank battery site is associated with the Merit Energy Hudson gathering system. The release was discovered the morning of August 11, 2004, having occurred during the previous night. The release was the result of a plugged produced water line. 285-bbl of crude oil was recovered from a total 300-bbl release.

#### III. Contaminant and Size of Area

The contaminant is unprocessed crude oil. The release was contained within the firewall structure of the tank battery. An area beyond the firewall on the south side of the battery has some surface residual resulting from overspray during the release event. (Site Plan)

The crude oil associated with these releases is considered RCRA Exempt oilfield waste. No evidence of other contaminants was observed.

#### IV. Vertical and Horizontal Extent of Contamination

A profile of the vertical contamination extent beneath the battery will be determined by the drilling of one borehole near the center of the battery. Analytical samples will be collected at 5-ft intervals.

#### V. Groundwater

There is no groundwater of record in the area according to information obtained from the New Mexico State Engineer online database.

#### VI. Action Plan

Based on the "Guidelines for Remediation of Leaks, Spills and Releases" New Mexico Oil Conservation Division – August 13, 1993 (Guidelines), the remedial goal for this site is 5000-ppm TPH, 50-ppm BTEX and 10-pp Benzene. Application of the NMOCD ranking criteria for contaminated soils at this site is presented below.

Depth to Ground Water: (>100-ft bgs)	0 points
Distance to Well Head or Water Source: (>1000-ft)	0 points
Distance to Surface Water/Waterways: (>1000-ft)	0 points
Total Score:	0 points

SESI proposes to remediate this site as follows:

1. The contaminated berm/firewall and the highly contaminated surface soil within the battery will be excavated and removed.

- 2. The borehole (Section IV) will be drilled, sampled and analyzed. The soil will be sampled at 5-ft intervals to a depth where a <5000-ppm TPH concentration is achieved. Bore samples will be field analyzed for TPH utilizing EPA Method 418.1. The final sample (<5000-ppm) will be submitted under Chain of Custody to Cardinal Laboratories, Hobbs, NM, for certified TPH and BTEX analyses.
- Utilizing the determined vertical delineation profile, the soil within the battery confinement area contaminated above the 5000-ppm TPH remedial goal will be excavated and removed.
- 4. A compacted 1-ft layer of clay will be installed on the bottom of the excavation. The clay layer will extend to the outer perimeter of the firewall.
- 5. The contaminated soil excavated and removed from this site will be transported to an, as yet, undetermined location (close proximity) and blended with available clean soil to reduce the TPH level to <5000-ppm. This blended material will be utilized to backfill the battery excavation and to reconstruct the firewall at the Hudson Battery site. Surplus blended soil will be stockpiled for future firewall construction and/or maintenance at any of Merit's numerous batteries in this area.

#### VII. Figures & Appendices

Figure 1. Vicinity Map

Figure 2. Site Plan

Appendix A Site Photos

Figure 1
Vicinity Map

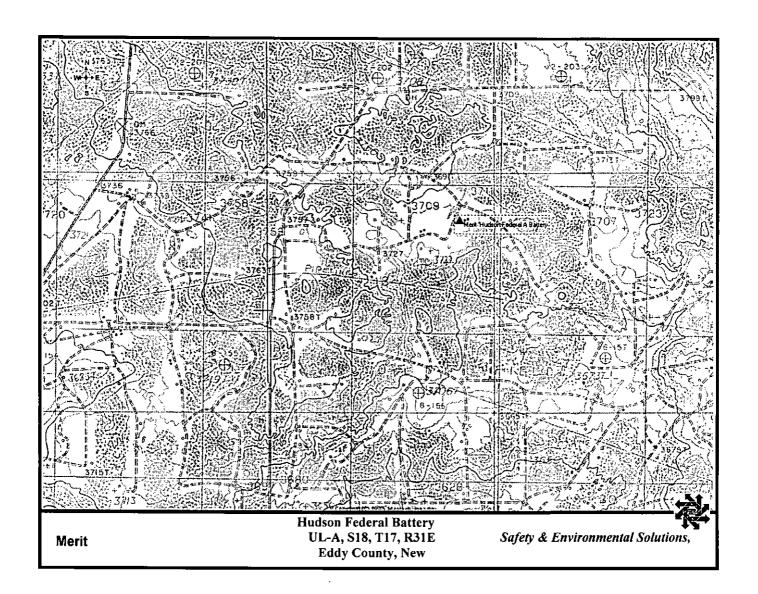
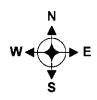
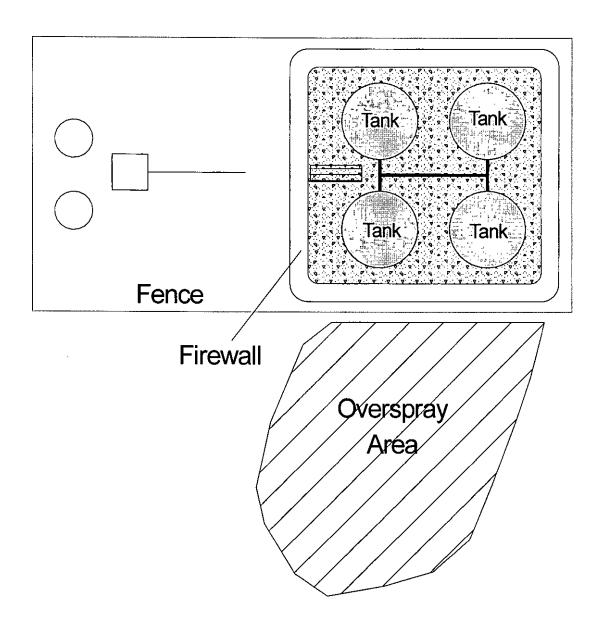


Figure 2

Site Plan





**Drawing Not To Scale** 



Hudson Federal Battery Sec. 18, T17S, R31E Eddy County, New Mexico

Safety & Environmental Solutions, Inc.

Appendix A
Site Photos

