



AE Order Number Banner

Report Description

This report shows an AE Order Number in Barcode format for purposes of scanning. The Barcode format is Code 39.



App Number: pENV0000003RP9

3RP - 9

BP AMERICA PRODUCTION COMPANY

10/25/2016

District I
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

Form C-141
Revised August 8, 2011

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

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: BP	Contact: Steve Moskal	
Address: 200 Energy Court, Farmington, NM 87401	Telephone No.: 505-326-9497	
Facility Name: Florance Gas Com J 016A	Facility Type: Natural gas well	
Surface Owner: Federal	Mineral Owner: Federal	API No. 3004521790

LOCATION OF RELEASE

Unit Letter P	Section 06	Township 30N	Range 09W	Feet from the 825	North/South Line South	Feet from the 1,030	East/West Line East	County San Juan	Section 3
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Latitude 36.83551° Longitude -107.81667° OCT 20 2016

NATURE OF RELEASE



Type of Release: Produced water, oil and condensate	Volume of Release: unknown	Volume Recovered: none
Source of Release: Former drilling reserve pit, compressor	Date and Hour of Occurrence: unknown	Date and Hour of Discovery: March 30, 2016
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom? Steve Moskal	Date and Hour:	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* The site has had known impacts for several years. During an investigative delineation of contaminants, it was noted two locations of concern that BP will have sole responsibility for remediation; near the compressor and in the vicinity where there is a suspected drilling reserve pit. The source of the compressor release appears historical in nature. Other impacts were noted, but require further delineation to determine the source.

Describe Area Affected and Cleanup Action Taken.* BP proposes to employ soil shredding to remediate hydrocarbon impacted soils at the location. The areas of concern will be excavated, treated and backfilled according to the attaché remediation plan, pending approval.

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: Steve Moskal	Approved by Environmental Specialist: 	
Title: Field Environmental Coordinator	Approval Date: 10/25/16	Expiration Date:
E-mail Address: steven.moskal@bp.com	Conditions of Approval: Sample for TPH (DRO - GRO - MRO), BTEX Collected At least 1 inch in the vicinity	Attached <input type="checkbox"/>
Date: October 18, 2016	Phone: 505-326-9497	

* Attach Additional Sheets If Necessary

#NCS162985 4256 of the Compressor Between Su-8 And Su-12
Assigned 3RP9 Closure 100 TPH (DRO - GRO - MRO)
50 BTEX
10 Benzene.

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BP Remediation Plan

To: Cory Smith (NMOCD), Katherina Diemer (BLM)
From: Steve Moskal (BP)
CC: John Ritchie (BP)
Date: 10/17/2016
Re: Florance Gas Com J 016A - Ex-situ Soil Remediation – Soil Shredding
(P) S06, T30N, R09W; API #30-045-21790

Dear Mr. Smith and Ms. Diemer,

The Florance Gas Com J 016A site is an active natural gas production well location within the San Juan Basin Gas Field in San Juan County, New Mexico. The site is located on land managed by the Bureau of Land Management Farmington Field Office (BLM-FFO) and is in an area primarily used for recreation.

Background

Historical impacts were identified at the location in the late 1990's. Initial site investigation determined additional delineation was required to define the extents of impacts. The well site is operated by BP Production with pipeline services provided by Williams Four Corners, LLC (Williams). On March 30, 2016, BP delineated the site based on the results of a soil vapor investigation conducted by Williams. Soil impacts were identified surrounding the BP operated compressor and separator, and flow lines in the vicinity of the natural gas dehydrator unit operated by Williams. The results of the delineation were reviewed by the New Mexico Oil Conservation Division (NMOCD) who determined further remediation is necessary in these locations.

In a letter dated October 6, 2016 and received by BP via certified letter on October 11, 2016, the NMOCD required BP to perform the following activities:

- Within 30 days BP will remediate both horizontally and vertically the areas near TH-4, 5, 8, 9, 10, 11 and the area north of Williams' line in the vicinity of SV-41.
- Within 45 days BP will plug and abandon MW-3 following NMED plugging guidelines if needed. (*this remains contingent on BP providing access to Williams for product recovery*).
- If it is determined that BP's operations impacted groundwater, BP will be required to submit a Draft Ground Water Remediation plan within 45 days of discovery.

In the mentioned letter, Williams was also required to perform remediation in their area of operations. A map is attached of the site and referenced locations. The figure depicts the area where both Williams and BP will be responsible for further remediation, based on current, known, conditions.

Proposed Remediation – Soil Shredding

Based on recent success of soil shredding technologies performed on BP remediation sites, BP proposes to use this technology at the subject site. To date, BP has successfully contracted soil shredding of nearly 42,000 cubic yards of soil to meet site closure standards.

Soil shredding involves the excavation of the impacted soil which is then placed in processing equipment, such as a hammer mill or pug mill, to mechanically process and break-up the soil. The soil becomes more uniform and is aerated during the mechanical processing. The soil is then ejected from

the processing equipment and a chemical oxidizer is applied, in this case, a 35% solution of hydrogen peroxide and water. The applied concentration of hydrogen peroxide typically ranges from 3-8%. The hydrogen peroxide quickly oxidizes the hydrocarbon impacts (reagents), resulting in soil, water and carbon dioxide (products). Once the soil is processed, it is stockpiled and allowed to sit for approximately 2-5 days of residence time. A composite soil sample is collected from each segregated stockpile and submitted for laboratory analysis to determine the effectiveness of the ex-situ remediation process. If the laboratory results are of acceptable levels, the soil will be used as backfill to the excavation; if results are unsatisfactory, the soil is passed through the process once more and a subsequent laboratory sample will be collected for laboratory confirmation as described before. Typically, 48 hours of notice is provided to the regulatory agencies for the opportunity to observe and witness the stockpile sampling.

BP proposes to perform the remediation of hydrocarbon impacts by the means of soil shredding. A conservative estimate of approximately 5,000 cubic yards of soil will be treated through the soil shredding process. BP proposes to treat the impacted soil and segregate windrow stockpiles broken into 100 cubic yard increments. A single, five point composite, soil sample will be collected to represent each 100 cubic yard stockpile. Once a baseline of approximately 1,000 cubic yards of soil is consistently and successfully treated, BP will propose to decrease the sampling frequency to 500 cubic yard stockpile segments. The 500 cubic yard sampling modification will be discussed with the NMOCD and BLM for approval and input prior to implementation. BP would expect to have a sampling modification approval from the agencies within 48 working hours from the time of request. The remediation will then continue until complete and sampling will be based on the regulatory agencies approved sampling plan.

Excavation sampling will be in accordance with a typical dig and haul. The sidewalls and base of the excavation will be sampled in a frequency based on the size and progress of the excavation. Agency notification of excavation sampling will also be issued in advanced, 48 hours if possible.

BP is currently working to establish a schedule to implement remediation at the site. BP plans to shut the well in and remove all surface equipment.

It is understood, that if soil remediation is not successful via the soil shredding, an alternative method such as a dig and haul or soil vapor extraction will be necessary. BP will be in close communications with the agencies in the event an alternative remediation method is required.

Site Closure and Reporting

Once the soil shredding process is complete, the excavated area will be fully backfilled and compacted, and surface equipment will be re-set. Final reclamation of the well pad will occur at a later date, once the natural gas production well is plugged and abandoned.

A final remediation report will be delivered to NMOCD and BLM for approval of final site closure regarding the excavation and soil shredding activities within 60 days of the end of remediation.

Approximate area's of responsibility
Based upon field investigations

