

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

received on  
11/13/17  
OCD District II  
Artesia, NM

Form C-141  
Revised April 3, 2017

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

Release Notification and Corrective Action

Initial Only

NAB1800930594

OPERATOR		<input checked="" type="checkbox"/> Initial Report	<input checked="" type="checkbox"/> Final Report
Name of Company	OXY USA INC	Contact	WADE DITTRICH
Address	PO BOX 4294; HOUSTON, TX 77210	Telephone No.	575-390-2828
Facility Name	CEDAR CANYON 15-1 SWD	Facility Type	SWD
Surface Owner	PRIVATE	Mineral Owner	API No. 30-015-42797

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
K	15	24S	29E	2500	SOUTH	1400	WEST	EDDY

Latitude 32.217183862 Longitude -103.97635767 NAD83

NATURE OF RELEASE

Type of Release	OIL & PRODUCED WATER	Volume of Release	40 BBLS OIL 50 BBLS PRODUCED WATER	Volume Recovered	90 BBLS
Source of Release	TANK OVERFLOWED - INSIDE CONTAINMENT	Date and Hour of Occurrence	10/25/2017	Date and Hour of Discovery	10/27/2017
Was Immediate Notice Given?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	MIKE BRATCHER-NMOCD; CRYSTAL WEAVER-NMOCD		
By Whom?	WADE DITTRICH	Date and Hour	10/27/2017 @ 8:20 PM		
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.\*

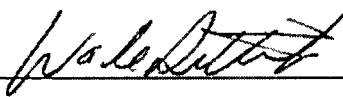
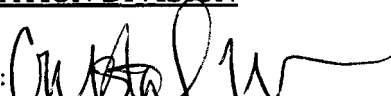

Describe Cause of Problem and Remedial Action Taken.\*

Tank overflowed-inside containment. The issue was corrected and returned to service.

Describe Area Affected and Cleanup Action Taken.\*

Affected area of the spill is approximately 76x76ft (measurements are subject to change with GPS tracking). Remediation was completed in accordance with a remediation plan approved by the NMOCD.

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.

OIL CONSERVATION DIVISION	
Signature: 	Approved by Environmental Specialist: 
Printed Name: WADE DITTRICH	Approval Date: 1/8/18 Expiration Date: N/A
Title: ENVIROMENTAL COORDINATOR	Conditions of Approval: see attached
E-mail Address: wade_dittrich@oxy.com	Attached: 
Date: 1-4-18 Phone: 575-390-2828	

\* Attach Additional Sheets If Necessary

1/8/18 AB

Operator/Responsible Party,

The OCD has received the form C-141 you provided on **11/13/17** regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 2RP-4546 has been assigned. **Please refer to this case number in all future correspondence.**

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

*The responsible person shall complete division-approved corrective action for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC. [emphasis added]*

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. **As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District II office in Artesia on or before 1/13/18. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.**

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

- Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C<sub>6</sub> thru C<sub>36</sub>), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.
- Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C<sub>6</sub> thru C<sub>36</sub>), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.
- Nominal detection limits for field and laboratory analyses must be provided.
- Composite sampling is not generally allowed.
- Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

- Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.

- If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.

- Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

**Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.**

**Jim Griswold**

OCD Environmental Bureau Chief

1220 South St. Francis Drive

Santa Fe, New Mexico 87505

505-476-3465

jim.griswold@state.nm.us

## Weaver, Crystal, EMNRD

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**From:** Weaver, Crystal, EMNRD  
**Sent:** Monday, January 8, 2018 10:27 AM  
**To:** 'Wade\_Dittrich@oxy.com'; Bratcher, Mike, EMNRD  
**Cc:** Jennifer\_Smith@oxy.com  
**Subject:** RE: Cedar Canyon 15-1 SWD-Initial C141 Corrected  
**Attachments:** RE: Cedar Canyon 15-1 SWD

Wade,

Thank you for correcting the coordinates on this one. This form that you have corrected is an Initial/Final that you originally submitted on 11/13/17. We are still waiting on this one for the pictures that OCD requested (see previous email of mine that I have attached above) and the letter confirming liner integrity and fill material was completely removed and replaced if there was any in the secondary containment. This C-141 form will not be processed until those requested items have been submitted.

Also OCD is still waiting on the other corrected coordinates for the C-141 Initial form that you had submitted to OCD on 12/27/17 according to your form this spill seems to have also occurred at the same location as the one mentioned in the above paragraph. On your original submission of this form you state full recovery 10bbbls lost 10bbbls recovered, yet decided to mark this form as Initial only. So a Final C-141 will need to be sent and if full recovery of fluids was indeed achieved for this release then you will again for this one have to provide photos and statements as I have just mentioned above for the other release.

Thank you,

### Crystal Weaver

Environmental Specialist  
OCD – Artesia District II  
811 S. 1<sup>st</sup> Street  
Artesia, NM 88210  
Office: 575-748-1283 ext. 101  
Cell: 575-840-5963  
Fax: 575-748-9720

**From:** Wade\_Dittrich@oxy.com [mailto:Wade\_Dittrich@oxy.com]  
**Sent:** Monday, January 8, 2018 7:17 AM  
**To:** Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>  
**Cc:** Jennifer\_Smith@oxy.com  
**Subject:** Cedar Canyon 15-1 SWD-Initial C141 Corrected

All,

Attached is the **Initial C141** that has been corrected. Please contact me if there are any questions. Thank you.

## Weaver, Crystal, EMNRD

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**From:** Wade\_Dittrich@oxy.com  
**Sent:** Monday, January 8, 2018 7:17 AM  
**To:** Weaver, Crystal, EMNRD; Bratcher, Mike, EMNRD  
**Cc:** Jennifer\_Smith@oxy.com  
**Subject:** Cedar Canyon 15-1 SWD-Initial C141 Corrected  
**Attachments:** Scanned from a Xerox Multifunction Device.pdf

All,

Attached is the **Initial C141** that has been corrected. Please contact me if there are any questions. Thank you.

Wade Dittrich  
**Environmental Specialist**  
**Oxy Permian-New Mexico**  
575-390-2828 cell  
575-397-8214 office  
**Wade\_Dittrich@Oxy.com**

## **Weaver, Crystal, EMNRD**

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**From:** Weaver, Crystal, EMNRD  
**Sent:** Tuesday, November 28, 2017 3:45 PM  
**To:** 'Wade\_Dittrich@oxy.com'; Bratcher, Mike, EMNRD  
**Subject:** RE: Cedar Canyon 15-1 SWD

Wade,

Thank you for offering to collect the additional requested information that OCD is requesting in order to close out an Initial/Final C-141 submission of a release that is stated to have been fully contained within secondary lined containment.

The written statement attesting to the integrity of the liner and stating that you yourself or another member of your organization (that has been informed/educated on what to look for) have inspected the liner is something we are normally going to want to see on the C-141 form itself, however for this one a letter will be fine. Also if any fill material is present atop of the liner a statement would also need to be made in the C-141 form that the material was fully removed and replaced.

The photos as I mentioned before we would like to have dropped into the body of an email from OXY, and if possible show the location sign in one photo and then possibly the containment before clean up and after clean up would be preferential.

Please let either myself or Mike Bratcher know if you have any questions or concerns regarding this request.

Thank you,

### **Crystal Weaver**

Environmental Specialist  
OCD – Artesia District II  
811 S. 1<sup>st</sup> Street  
Artesia, NM 88210  
Office: 575-748-1283 ext. 101  
Cell: 575-840-5963  
Fax: 575-748-9720

**From:** Wade\_Dittrich@oxy.com [mailto:Wade\_Dittrich@oxy.com]  
**Sent:** Monday, November 13, 2017 7:51 AM  
**To:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>  
**Subject:** Cedar Canyon 15-1 SWD

All,

Attached is the **Initial** and **Final C141**. Please review and let me know if there any questions. I will be sending photos or a letter stating the integrity of the liner shortly. Thank you.

Wade Dittrich

**Environmental Specialist**

**Oxy Permian-New Mexico**

575-390-2828 cell

575-397-8214 office

[Wade\\_Dittrich@Oxy.com](mailto:Wade_Dittrich@Oxy.com)

## Weaver, Crystal, EMNRD

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**From:** Wade\_Dittrich@oxy.com  
**Sent:** Monday, November 13, 2017 7:51 AM  
**To:** Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD  
**Subject:** Cedar Canyon 15-1 SWD  
**Attachments:** Scanned from a Xerox Multifunction Device001.pdf

All,

Attached is the **Initial** and **Final C141**. Please review and let me know if there any questions. I will be sending photos or a letter stating the integrity of the liner shortly. Thank you.

Wade Dittrich  
**Environmental Specialist**  
**Oxy Permian-New Mexico**  
575-390-2828 cell  
575-397-8214 office  
Wade\_Dittrich@Oxy.com