

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  
11/21/17  
OCD District II

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

NAB1801741002

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	CORRAL DRAW 2 SWD	Facility Type	SWD
Surface Owner	BLM	Mineral Owner	API No. 30-015-21425

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
K	22	25S	29E	1580	SOUTH	1980	WEST	EDDY

Latitude\_ 32.112280 \_ Longitude\_ -103.974360 \_ NAD83

NATURE OF RELEASE

Type of Release	PRODUCED WATER	Volume of Release	130 bbls	Volume Recovered	130 bbls
Source of Release	Tank ran over when pump went down due to automation.	Date and Hour of Occurrence	11-7-2017	Date and Hour of Discovery	
Was Immediate Notice Given?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? CRYSTAL WEAVER-NMOCD; MIKE BRATCHER-NMOCD; SHELLY TUCKER-BLM			
By Whom?	WADE DITTRICH	Date and Hour 11/8/2017 @ 8:10 AM			
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.\*


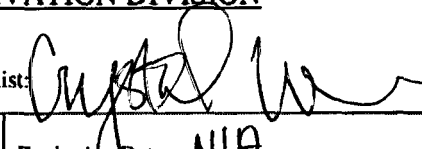
Describe Cause of Problem and Remedial Action Taken.\*

Tank ran over when pump went down due to automation. Leak has been corrected and returned to service.

Describe Area Affected and Cleanup Action Taken.\*

The affected area of the spill is 35x20 (measurements are subject to change with GPS tracking). Remediation will be completed in accordance with a remediation plan approved by the NMOCD and the BLM.

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: 11/14/18 Expiration Date: N/A
Title: ENVIRONMENTAL COORDINATOR	Conditions of Approval: see attached
E-mail Address: wade_dittrich@oxy.com	Attached <input checked="" type="checkbox"/> 2RP-4564
Date: 11/8/2017 Phone: 575-390-2828	

11/11/18 AB

Operator/Responsible Party,

The OCD has received the form C-141 you provided on **11/21/17** regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 2RP-45104 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 12/21/17. 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:** Tuesday, January 16, 2018 1:36 PM  
**To:** 'Wade\_Dittrich@oxy.com'; Bratcher, Mike, EMNRD  
**Cc:** 'stucker@blm.gov'; 'Jennifer\_Smith@oxy.com'  
**Subject:** RE: Corral Draw 2 SWD

OXY \* Corral Draw #2 SWD \* 30-015-\*21425

Hello all,

OCD started out as holding on to Initial/Final C-141 until the requested statements and photos were provided by the operators for cases when total volume recovery is mentioned due to having secondary containment that was said to have contained all fluids. Since holding on to the forms and waiting for the requested items above was not working out to be the best way to do things, OCD has decided to now to mark any Initial/Final C-141 that comes in, and is of the above mentioned nature, as an **Initial C-141 only** and upon receipt of the requested pictures and statements a Final C-141 can be submitted and then reviewed for processing of closure of said release case.

So for this C-141 along with one other submitted in the recent past for the release at the Cedar Canyon 15-1 SWD (DOR 10/25/17) that was submitted on 11/13/17 I will go ahead and mark them as Initial C-141 only and process them that way so we get them in the system and off my desk.

If you have any questions or concerns about this change please let either myself or Mike Bratcher know here in the OCD District II Office.

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:** Weaver, Crystal, EMNRD  
**Sent:** Friday, December 1, 2017 1:41 PM  
**To:** 'Wade\_Dittrich@oxy.com' <Wade\_Dittrich@oxy.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>  
**Cc:** stucker@blm.gov; Jennifer\_Smith@oxy.com  
**Subject:** RE: Corral Draw 2 SWD

Wade,

## **Weaver, Crystal, EMNRD**

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**From:** Weaver, Crystal, EMNRD  
**Sent:** Friday, December 1, 2017 1:41 PM  
**To:** 'Wade\_Dittrich@oxy.com'; Bratcher, Mike, EMNRD  
**Cc:** stucker@blm.gov; Jennifer\_Smith@oxy.com  
**Subject:** RE: Corral Draw 2 SWD

Wade,

As I mentioned to you before in an email I sent to just this week about another Initial/final submission you had on Cedar Canyon 15-1 SWD release, the same expectations I stated on that one will also apply to this one.

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 (just like I said to the other one you sent in mentioned in the first sentence above). 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:** Tuesday, November 21, 2017 10:40 AM  
**To:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>  
**Cc:** stucker@blm.gov; Jennifer\_Smith@oxy.com  
**Subject:** Corral Draw 2 SWD

All,

Attached is the **Initial/Final C-141**. This is a lined facility and the liner integrity is good throughout the facility. Please review and let me know if there any questions. Thank you.