

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

JUN 07 2018

Form C-141
Revised April 3, 2017

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Submit 1 Copy to appropriate District Office in
DISTRICT II-ARTESIA accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

NAB 8110355013 OPERATOR ☒ Initial Report ☐ Final Report

Name of Company Longfellow Energy LP 372210	Contact David Cain
Address 16803 Dallas Parkway Addison, TX 75001	Telephone No. 214-265-4715
Facility Name Loco Hills - Phillips 17	Facility Type Tank Battery

Surface Owner Bureau of Land Management	Mineral Owner Bureau of Land Management	API No. 30-015-31260
---	---	-----------------------------

LOCATION OF RELEASE

Unit Letter P	Section 17	Township 17S	Range 29E	Feet from the 890	North/South Line South	Feet from the 903	East/West Line East	County Eddy
------------------	---------------	-----------------	--------------	----------------------	---------------------------	----------------------	------------------------	----------------

Latitude 32.82977 Longitude -104.09129 NAD83

NATURE OF RELEASE

Type of Release salt water and oil	Volume of Release 10 barrels	Volume Recovered 7 barrels
Source of Release 3" steel pipe	Date and Hour of Occurrence 6-2-18 @ 08:00	Date and Hour of Discovery 6-2-18 @ 11:15 a.m.
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom? Steven Buckler	Date and Hour 6-4-18 @ 11:08 a.m.	
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. 3" piece of steel pipe developed a pin hole and started leaking fluid. Fluid was all inside dyke area except for a little seeped through where the pipe came through the dyke. Immediately shut in all wells coming into facility. Immediately called out a tank truck to pick up fluid in dyke.		
Describe Area Affected and Cleanup Action Taken.* Area affected inside the dyke area with a little outside the dyke area. Picked up approximately 7 barrels.		
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: David Cain	Signed By  Approved by Environmental Specialist:	
Title: Engineering Technologist & regulatory Analyst	Approval Date: 6/8/18	Expiration Date: N/A
E-mail Address: david.cain@longfellowenergy.com	Conditions of Approval: See Attached Attached 2BP-4800	
Date: 6/7/2018	Phone: 214-265-4715	

* Attach Additional Sheets If Necessary

Operator/Responsible Party,

The OCD has received the form C-141 you provided on 6/7/2018 regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 2RP-4800 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 2 office in ARTESIA on or before 7/7/2018. 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; C₆ thru C₃₆), 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; C₆ thru C₃₆), 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

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Friday, June 8, 2018 7:03 AM
To: 'David Cain'; stucker@blm.gov
Cc: Steven Buckler; Rocky Pugh; David Mitchell
Subject: RE: C-141 Form for Phillips 17 Tank Battery

David,

It looks like this battery is on the same pad as the Phillips 17 Fed 1 well (30-015-31260). If we have an API number, it makes data entry and tracking a little easier. This release will be entered, and can be searched, under that API number.

Thanks,

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108

From: David Cain <david.cain@longfellowenergy.com>
Sent: Thursday, June 7, 2018 3:37 PM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; stucker@blm.gov
Cc: Steven Buckler <steven.buckler@longfellowenergy.com>; Rocky Pugh <Rocky.Pugh@longfellowenergy.com>; David Mitchell <david.mitchell@longfellowenergy.com>
Subject: C-141 Form for Phillips 17 Tank Battery

Hello Mike and Shelly,

Attached is the C-141 form for a release that happened on our tank battery on 6-2-2018.

Please let us know if you need any additional information.

Thank you,

David Cain
Engineering Technologist & Regulatory Specialist

O. 214.265.4715 | Ext. 1715
16803 Dallas Pkwy | Addison, TX 75001



Bratcher, Mike, EMNRD

From: Steven Buckler <steven.buckler@longfellowenergy.com>
Sent: Monday, June 4, 2018 11:08 AM
To: Bratcher, Mike, EMNRD
Cc: Rocky Pugh
Subject: Reporting Spill on Phillips Federal 17 Lease

Mike,

My name is Steven Buckler, Operations Engineer with Longfellow Energy. I would like to inform you (OCD) of a spill on our Phillips Federal 17 Battery. Below is the details of the spill. Please let myself and Rocky Pugh (Production Superintendent) know what protocols you would like us to take. Thanks.

Date of Spill: 6/2/2018

Location: Phillips Federal 17 Battery

Directons: From Artesia, NM go east on Hwy 82 for 18.5 miles to CR 211. Turn left (north). Continue on road, after seeing caliche pit, turn right (east) on second turn from pit. Continue on road to Phillips 17 Battery.

Current Actions: Shut-in all producing wells on lease. Used vacuum truck to remove all surface fluids inside dyke.

-Steven Buckler

Longfellow Energy Operations Engineer