

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, 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

JAN 23 2009
OCD-ARTESIA
Form C-141
Revised October 10, 2003

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

30-015-20665

Release Notification and Corrective Action

nMLB 1009647272

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company BP America Production Company 778	Contact Steve Pacheco
Address PO Box 129 Artesia, NM 88210	Telephone No. 575-677-3642
Facility Name Empire Abo Unit N-13	Facility Type Flow line

Surface Owner BLM	Mineral Owner BLM	Lease No.
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LOCATION OF RELEASE

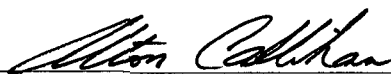
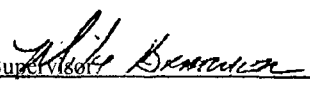
Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
E	11	18S	27E	1618		330		Eddy

Latitude **32.7645** Longitude **104.256181**

NATURE OF RELEASE

Type of Release Produced Water	Volume of Release Unknown	Volume Recovered Unknown
Source of Release Flow line	Date and Hour of Occurrence	Date and Hour of Discovery
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	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.*		
Describe Area Affected and Cleanup Action Taken.*		

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: Alton G. Callihan	Approved by:  Signed By: Steve Pacheco	
Title Permian Operating Center Manager	Approval Date:	Expiration Date:
E-mail Address: steve.pacheco@bp.com	Conditions of Approval:	
Date: 1/12/2009 Phone: 432-688-5200	Attached <input type="checkbox"/>	

* Attach Additional Sheets If Necessary

nMLB 1009647987

REMEDATION per OCD Rules and
Guidelines. **SUBMIT REMEDIATION
PROPOSAL BY: Closure Report**
REC'd 3/25/10

2RP-397



DEC - 1 2008

OCD-ARTESIA

**SOILS REMEDIATION WORK PLAN
EMPIRE ABO UNIT N-13
EDDY COUNTY, NEW MEXICO
LEGALS: SEC 11-T18S-R27E**

AVATILLO
021 North Drive
Amarillo, Texas 79107
Phone: 806.467.0007
Fax: 806.467.0002

AUSTIN
3000 Tom Gary Court
Building C-100
Round Rock, Texas 78664
Phone: 2.500.3428
Fax: 2.500.3487

VIENNA
4900 East Industrial Loop
Midland, Texas 79701
Phone: 432.522.2133
Fax: 432.522.0150

NEW BRAUNFELS
707 N. W. Hwy. Ave.
Suite 200
New Braunfels, Texas 78130
Phone: 210.570.0235
Fax: 210.563.218

TULSA
9800 East 43rd Street, Ste. G
Tulsa, OK 74146
Phone: 918.742.0877
Fax: 918.742.0876

HOBBS
318 East Taylor Street
Hobbs, New Mexico 88240
Phone: 505.393.4200
Fax: 505.393.4652

ENVIRONMENTAL CONSULTING
ENGINEERING
DRILLING
CONSTRUCTION
EMERGENCY RESPONSE

Prepared for:

BP AMERICA PRODUCTION CO.
PO Box 3092
Houston, Texas 77253

Prepared by:

Talon/LPE
Eb Taylor
318 East Taylor
Hobbs, New Mexico 88240

November 13, 2008

Toll Free: 888.742.0742
www.talonlpe.com

Soils Remediation Workplan

Introduction

The site is located in a rural area of the Empire Abo Oil Field in Eddy County New Mexico, Sec 11-T18S-R27E. The release of produced water occurred approximately five hundred feet to the east of the plugged well marker for the Empire Abo Unit N-13 and ran approximately one hundred feet to the west of the marker. The path of the spill is approximately six hundred eighty feet (east/ west) by one hundred twenty feet (north / south).

In October 2008 Talon/LPE was notified by BP America that they had received written orders from Jim Amos with the Bureau of Land Management (BLM) to remediate the impacted areas. On October 29, 2008 Talon/LPE conducted a site investigation.

Regulatory Framework

The New Mexico Oil Conservation Division (NMOCD) has developed guidance for all federal, state, and fee lands in New Mexico for remediating contaminants resulting from leaks, spills, and releases of oil field wastes or products. This guidance assigns ranking scores to sites based on depth to groundwater, distance to water supply sources, and distance to surface water bodies, and provides remediation/clean-up levels for Benzene, BTEX (benzene, toluene, ethyl benzene, and xylenes), and TPH (total petroleum hydrocarbons). Based on site visits the Empire Abo Unit N-13 is located in a rural area with no permanent residences within a thousand foot radius of the spill area. According to information available from the New Mexico Office of State Engineer, there is no domestic water wells located in Sec 11-T18S-R27E. According to information available from the NMOCD, the water depth is approximately one hundred to one hundred fifty feet below ground surface (BGS).

According to NMOCD guidance, and based on depth to groundwater, distance from water supply sources, and distance to surface water bodies, the site ranking for this site is twenty (20).

Based on the calculated rating, the applicable remediation guidelines for this site are as follows:

Benzene	10ppm
BTEX	50 ppm
TPH	100 ppm
Chlorides	250 ppm

Site Investigation Activities

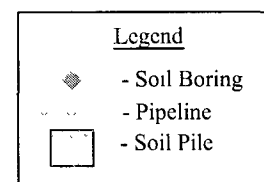
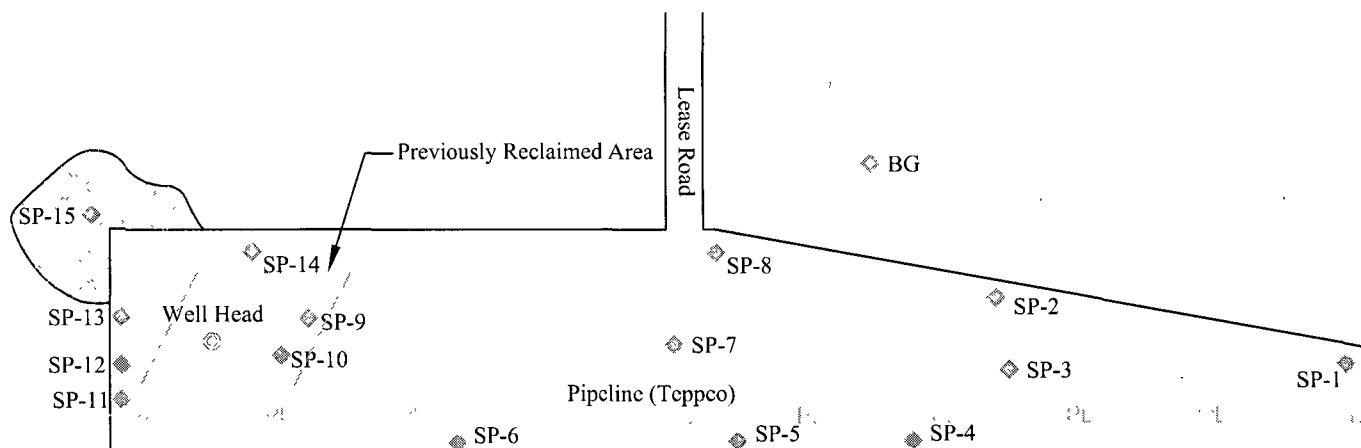
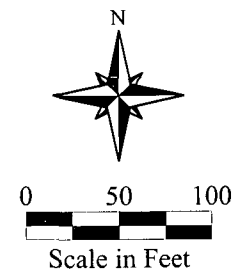
In an effort to delineate the extent of the impacted soils at the site Talon/LPE excavated fifteen pilot holes, using a back hoe, to depths from two foot to seven foot BGS on October 29, 2008. Sample points were selected based on overall surface inspection, to investigate subsurface conditions (see attached map for sample point locations fig. 1). Samples were collected at one foot intervals and select samples were sent to Trace Analysis Laboratories in Lubbock, Texas for chloride analysis (see attached analytical fig. 2). Field analysis for chlorides was used to determine which select samples were sent for analysis. During field inspection evidence of petroleum hydrocarbons were evident in only a couple of small areas, so analysis for BTEX and TPH was not conducted during the investigation of the site. The areas impacted with hydrocarbons will be excavated during remediation activities. Due to physical constraints presented by massive gypsum at the site, sample points were limited in depth.

Site Remediation Plan

The site investigation results indicated the presence of chloride impacted soils above the applicable NMOCD guidelines.

Talon/LPE proposes to excavate the impacted soils and transport them to Lea Land Disposal Facility in Lea County, New Mexico, a NMOCD approved disposal facility (permit number WM 01-35). Once the impacted soils are removed Talon/LPE will collect confirmation samples for chlorides, BTEX, and TPH from the excavation floor and sidewalls. The excavation floor will be divided into sections and a five point composite sample will be collected from each section, the sidewalls will also be divided into sections and a five point composite sample will be collected from each of these sections. All samples collected will be tested at Trace Analysis Laboratories in Lubbock, Texas. Once approved for closure the excavation will be backfilled with calachie purchased from an approved BLM calachie pit with the top one foot of the excavation being backfilled with top soil to sustain vegetation.

ATTACHMENT 1



Project # BPETRP029REC

Note: Approximate scale, not for engineering reference



Date: 11/11/2008

Scale: 1" = 100'

Drawn By: SJA

BP America
 Empire ABO Unit N-13
 Eddy County, New Mexico
 Figure 2 - Site Plan and Sample Locations Map

ATTACHMENT 2

Summary Report

Eb Taylor
Talon LPE-Hobbs
318 E Taylor
Hobbs, NM 88240

Report Date: November 7, 2008

Work Order: 8103005



Project Location: Eddy County, NM
Project Name: Empire ABD Unit N-13

Sample	Description	Matrix	Date Taken	Time Taken	Date Received
177579	BG-1	soil	2008-10-29	12:30	2008-10-30
177580	SP-1 4'	soil	2008-10-29	10:28	2008-10-30
177581	SP-2 2.5'	soil	2008-10-29	10:35	2008-10-30
177582	SP-3 2.5'	soil	2008-10-29	10:47	2008-10-30
177583	SP-4 2'	soil	2008-10-29	10:55	2008-10-30
177584	SP-5 1'	soil	2008-10-29	11:01	2008-10-30
177585	SP-5 4'	soil	2008-10-29	11:09	2008-10-30
177586	SP-6 1'	soil	2008-10-29	11:12	2008-10-30
177587	SP-6 3'	soil	2008-10-29	11:16	2008-10-30
177588	SP-7 5'	soil	2008-10-29	11:49	2008-10-30
177589	SP-7 7'	soil	2008-10-29	13:05	2008-10-30

Sample - Field Code	BTEX				TPH DRO	TPH GRO
	Benzene (mg/Kg)	Toluene (mg/Kg)	Ethylbenzene (mg/Kg)	Xylene (mg/Kg)	DRO (mg/Kg)	GRO (mg/Kg)
177580 - SP-1 4'	<0.0100	<0.0100	0.0326	0.135	75.1	4.26

Sample: 177579 - BG-1

Param	Flag	Result	Units	RL
Chloride		<100	mg/Kg	2.00

Sample: 177580 - SP-1 4'

Param	Flag	Result	Units	RL
Chloride		5710	mg/Kg	2.00

Sample: 177581 - SP-2 2.5'

Param	Flag	Result	Units	RL
Chloride		3020	mg/Kg	2.00

Sample: 177582 - SP-3 2.5'

Param	Flag	Result	Units	RL
Chloride		5000	mg/Kg	2.00

Sample: 177583 - SP-4 2'

Param	Flag	Result	Units	RL
Chloride		3470	mg/Kg	2.00

Sample: 177584 - SP-5 1'

Param	Flag	Result	Units	RL
Chloride		1070	mg/Kg	2.00

Sample: 177585 - SP-5 4'

Param	Flag	Result	Units	RL
Chloride		1230	mg/Kg	2.00

Sample: 177586 - SP-6 1'

Param	Flag	Result	Units	RL
Chloride		1270	mg/Kg	2.00

Sample: 177587 - SP-6 3'

Param	Flag	Result	Units	RL
Chloride		1090	mg/Kg	2.00

Sample: 177588 - SP-7 5'

Param	Flag	Result	Units	RL
Chloride		6050	mg/Kg	2.00

Report Date: November 7, 2008

Work Order: 8103005
Empire ABD Unit N-13

Page Number: 3 of 3
Eddy County, NM

Sample: 177589 - SP-7 7'

Param	Flag	Result	Units	RL
Chloride		1850	mg/Kg	2.00

Summary Report

Eb Taylor
Talon LPE-Hobbs
318 E Taylor
Hobbs, NM 88240

Report Date: November 7, 2008

Work Order: 8103007



Project Location: Eddy County, NM
Project Name: Empire ABD Unit N-13

Sample	Description	Matrix	Date Taken	Time Taken	Date Received
177605	SP-8 1'	soil	2008-10-29	11:36	2008-10-30
177606	SP-8 4'	soil	2008-10-29	11:44	2008-10-30
177607	SP-9 2'	soil	2008-10-29	11:57	2008-10-30
177608	SP-11 2'	soil	2008-10-29	12:28	2008-10-30
177609	SP-12 1'	soil	2008-10-29	12:31	2008-10-30
177610	SP-13 1'	soil	2008-10-29	12:38	2008-10-30
177611	SP-14 2'	soil	2008-10-29	12:45	2008-10-30
177612	SP-15 2'	soil	2008-10-29	12:51	2008-10-30

Sample: 177605 - SP-8 1'

Param	Flag	Result	Units	RL
Chloride		385	mg/Kg	2.00

Sample: 177606 - SP-8 4'

Param	Flag	Result	Units	RL
Chloride		248	mg/Kg	2.00

Sample: 177607 - SP-9 2'

Param	Flag	Result	Units	RL
Chloride		2320	mg/Kg	2.00

Report Date: November 7, 2008

Work Order: 8103007
Empire ABD Unit N-13

Page Number: 2 of 2
Eddy County, NM

Sample: 177608 - SP-11 2'

Param	Flag	Result	Units	RL
Chloride		3290	mg/Kg	2.00

Sample: 177609 - SP-12 1'

Param	Flag	Result	Units	RL
Chloride		9420	mg/Kg	2.00

Sample: 177610 - SP-13 1'

Param	Flag	Result	Units	RL
Chloride		2440	mg/Kg	2.00

Sample: 177611 - SP-14 2'

Param	Flag	Result	Units	RL
Chloride		1890	mg/Kg	2.00

Sample: 177612 - SP-15 2'

Param	Flag	Result	Units	RL
Chloride		2480	mg/Kg	2.00