

Basin Environmental Service Technologies, LLC

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Tomas Oberding
New Mexico Energy, Minerals and Natural Resources Department
New Mexico Oil Conservation Division (District 1)
1625 French Drive
Hobbs, New Mexico 88240

RECEIVED

By OCD; Dr. Oberding at 1:36 pm, Mar 31, 2015

Re: Remediation Plan
Hat Mesa 32 State #1 Flow Line
Unit Letter B (NW/NE), Section 31, Township 20 South, Range 33 East
Lea County, New Mexico

APPROVED

By OCD; Dr. Oberding at 1:36 pm, Mar 31, 2015

Mr. Oberding:

This email has been prepared in regard to BOPCO, L.P.'s Hat Mesa 32 State #1 Flow Line release site. The legal description of the release site is Unit Letter "B" (NW/NE), Section 31, Township 20 South, Range 33 East, in Lea County, New Mexico. The property affected by the release is owned by the State of New Mexico and administered by the New Mexico State Land Office. The release site GPS coordinates are 32.535028 North and 103.700994 West. A "Site Location Map" is provided for your convenience.

An inferred depth-to-groundwater gradient map utilized by the NMOCD indicates the depth to groundwater is approximately 70' bgs at the release site. NMOCD guidelines indicate the Hat Mesa 32 State #1 Flow Line release site has an initial ranking score of ten (10) points. The soil remediation levels for a site with a ranking score of ten (10) points are as follows:

- Benzene – 10 mg/Kg (ppm)
- Benzene, Toluene, Ethylbenzene and Xylene (BTEX) – 50 mg/Kg (ppm)
- Total Petroleum Hydrocarbons (TPH) – 1,000 mg/Kg (ppm)

The New Mexico Administrative Code (NMAC) does not currently specify a remediation level for chloride concentrations in soil. Chloride remediation levels are set by the NMOCD on a site-specific basis.

On May 18, 2014, BOPCO discovered a release occurred on a flow line at the Hate Mesa 31-32 Tank Battery. The initial form C-141 indicated failure of a section of 3" poly-pipe flow line resulted in the release of approximately 25 bbls of crude oil. The release pooled in two (2) areas measuring approximately 1,200 sq. ft. just west of the tank battery in the adjacent pasture. The spill also sprayed an area measuring approximately 6,750 sq. ft. where the soil had about ½" of saturation and the vegetation was coated. The release also affected an area measuring approximately 4,500 sq. ft. where the soil and vegetation were moderately misted and an area measuring approximately 5,400 sq. ft. where the vegetation was only lightly misted. During initial response activities, a vacuum truck was used to recover approximately 15 bbls of free standing fluid from the pooling areas. Photographs and an "Initial Form C-141" are attached for your convenience.

BOPCO proposes the following remediation strategy to advance the Hat Mesa 32 State #1 Flow Line release toward an NMOCD-approved closure:

- On approval, impacted soil in the areas defined by the pooling areas will be excavated until field test suggests concentrations of BTEX, TPH and chloride are below NMOCD regulatory remediation action levels. Confirmation soil samples will be collected from the excavation floor and sidewalls at approximate fifty-foot (50') intervals and submitted to Cardinal Laboratories for analysis of BTEX, TPH, and chlorides using EPA methods SW-846 8021b, SW-846 8015M, and 4500 Cl-B, respectively. Areas exhibiting BTEX, TPH and chloride concentrations above NMOCD regulatory remediation action levels will be excavated until confirmation soil samples indicate chloride, BTEX and TPH concentrations are below NMOCD regulatory remediation action levels. Heavily impacted soil will be hauled to an NMOCD-approved disposal facility.
- On approval, impacted soil in the area defined by the 6,750 sq. ft. that was moderately misted, where the soil had about ½" of saturation and the vegetation was coated, will be scrapped up to the extent practicable, while attempts are made to preserve natural and viable vegetation. Affected vegetation left in-situ will be washed down with a soap and micro-blaze solution on May 21, 2014. Confirmation soil samples will be collected on approximate 50' intervals.
- On approval, impacted soil in the areas defined by the 4,500 sq. ft. of moderately misted soil and vegetation, and the 5,400 sq. ft. of lightly misted vegetation will be excavated only as necessary. Affected soil and vegetation left in-situ will be washed down with a soap and micro-blaze solution on May 21, 2014. Confirmation soil samples will be collected on approximate 50' intervals to demonstrate that the soil impact was limited to the surface and should attenuate naturally.
- On approval, a PID and chloride field test kit will be utilized to segregate excavated material exhibiting BTEX, TPH and chloride concentrations above NMOCD regulatory remediation action levels from material exhibiting BTEX, TPH and chloride concentrations below NMOCD regulatory remediation action levels. Excavated material exhibiting BTEX, TPH and chloride concentrations above NMOCD regulatory remediation action levels will be hauled to an NMOCD-approved disposal facility. Excavated material exhibiting BTEX, TPH and chloride concentrations below NMOCD regulatory remediation action levels may be used for backfill material upon receiving confirmation laboratory analysis from composite samples.
- On approval, segregated soil exhibiting concentrations of BTEX, TPH and chloride below NMOCD regulatory remediation action levels derived from remediation activities will be placed in the floor of the deepest excavation. Locally purchased, non-impacted soil will be used to meet the remaining backfill needs.
- Areas affected by remediation activities will be countered to match the surrounding topography and reseeded in accordance with the NMOCD and New Mexico State Land Office.

Upon completion of the remediation activities, Basin will prepare a "Remediation Summary and Site Closure Request" detailing remediation activities and the results of confirmation soil sampling.

If you have any questions or need any additional information, please feel free to contact me by phone or email.

Respectfully,



Joel W. Lowry
Basin Environmental Service Technologies, LLC

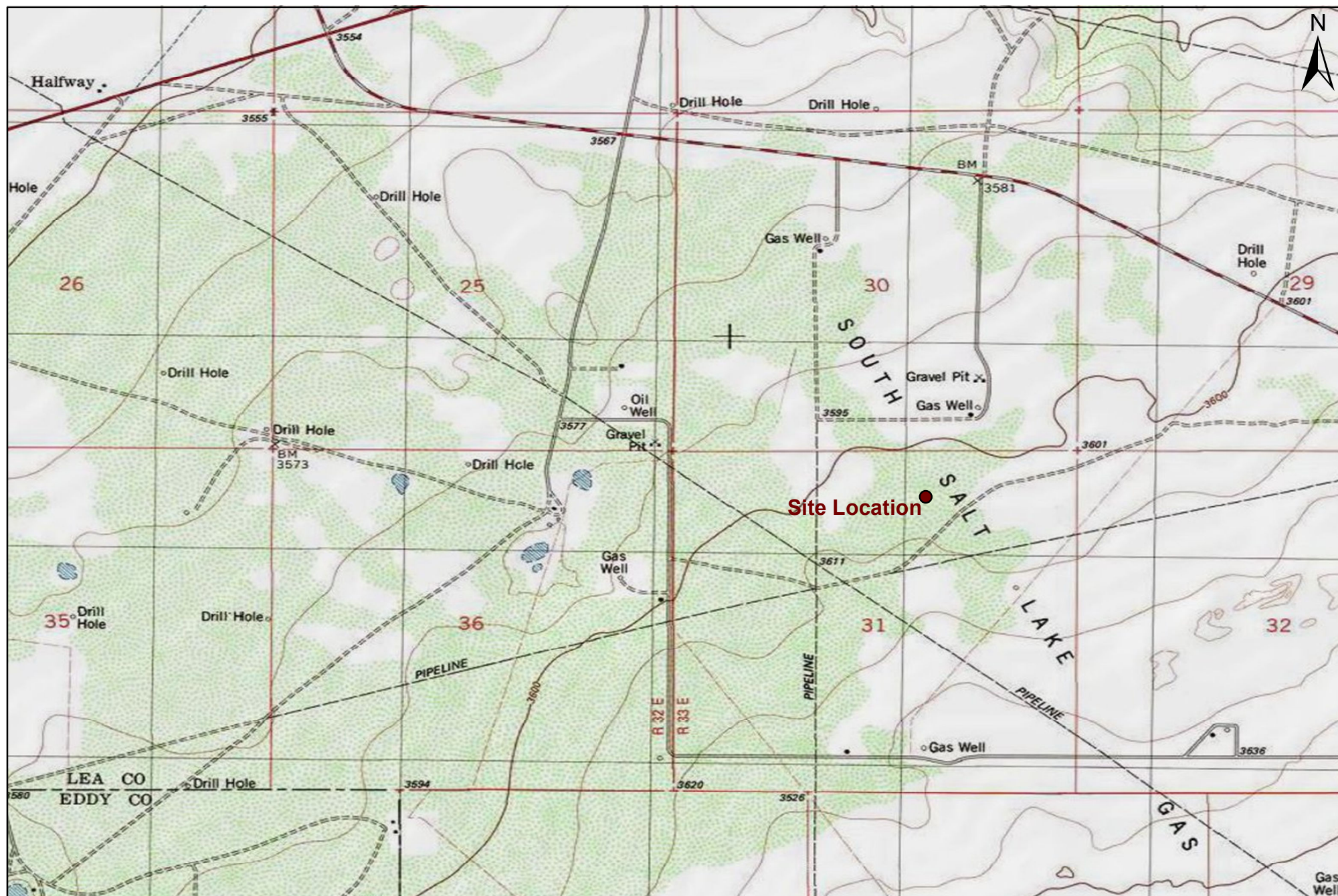
Attachments:

Attachment #1: Site Location Map

Attachment #2: Photographs

Attachment #3: Site and Proposed Activities Map

Attachment #4: Initial C-141



1,000 500 0 1,000 2,000
 Distance in Feet

Figure 1
Site Location Map
BOPCO, LP
Hat Mesa State 31-32 Battery
Lea County, New Mexico
NMOCD Ref. #: 1RP-5-12-2812



Basin Environmental Service Technologies, LLC
 3100 Plains Hwy.
 Lovington, NM 88260

Drawn By: BJA Checked By: BRB

May 21, 2012 Scale: 1" = 2000'



Photograph of the initial release and pooling area at the Hat Mesa 32 State #1 Flow Line Release Site.



Photograph of the initial release and pooling area at the Hat Mesa 32 State #1 Flow Line Release Site.



Photograph of the initial release and heavily misted area at the Hat Mesa 32 State #1 Flow Line Release Site.



Photograph of the lightly misted area at the Hat Mesa 32 State #1 Flow Line Release Site.

Lightly Misted area

Moderately misted

Heavily Misted

Flow Line spill 5/18/14

Hat Mesa 31-32 Battery

© 2014 Google

Imagery Date: 2/13/2014 lat 32.535235° lon -108.111111°

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

HOBBS OGD State of New Mexico
Energy Minerals and Natural Resources

MAY 19 2014 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.

RECEIVED

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: BOPCO, L.P.	Contact: Tony Savoie
Address: 522 W. Mermod, Suite 704 Carlsbad, N.M. 88220	Telephone No. 575-887-7329
Facility Name: Hat Mesa 32 State #1. The flow line spill is 2700 ft. west of the well at the Hat Mesa 31-32 Tank Btry.	Facility Type: Exploration and Production

Surface Owner: State of N.M.	Mineral Owner: State of N.M.	API No. 30-025-34704
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LOCATION OF RELEASE

Unit Letter B	Section 31	Township 20S	Range 33E	Feet from the	North/South Line	Feet from the	East/West Line	County: Lea
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Latitude N 32.535028 Longitude W 103.700994

NATURE OF RELEASE

Type of Release: Crude oil	Volume of Release: 25 Bbls.	Volume Recovered: 15 Bbls.
Source of Release: 3" poly flow flow-line	Date and Hour of Occurrence: 5/18/14 time unknown	Date and Hour of Discovery: 5/18/14 at 11:00 a.m.
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Maxey Brown "NMOCD"	
By Whom? Tony Savoie	Date and Hour: 5/18/14 at 12:03 p.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.*

The 3" poly-pipe flow line ruptured do a valve being closed at the well test header, the high pressure switch at the wellhead failed to shut down the well. The well was shut in until permanent repairs could be made.

Describe Area Affected and Cleanup Action Taken.*

The release puddled up in 2 areas just west of the tank battery in the pasture, both of the puddle areas were a total of 1200 sq.ft. The spill also sprayed and area of approximately 6,750 sq.ft. where the soil had about 1/2" of saturation and the vegetation was coated. The release also misted an area of approximately 4,500 sq.ft. where the soil and vegetation was moderately misted. The release also misted and area of approximately 5,400 sq.ft. where the vegetation was lightly misted. Vacuum truck was on-site recovering the free standing fluid and a crew was dispatched to wash down the heavily impacted vegetation with soap and micro-blaze.

The impacted area will be cleaned up in accordance to the NMOCD recommended remediation guidelines.

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: Tony Savoie			
Title: Waste Management and Remediation Specialist	Approval Date:	Expiration Date:	
E-mail Address: tasavoie@basspet.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 5/19/14	Phone: 432-556-8730		

* Attach Additional Sheets If Necessary