



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

**August 18, 2017**

**Attn. Mike Bratcher**  
NMOCD, District 2  
811 South First Street  
Artesia, NM 88210

**RE: Corrective Action Plan  
XTO Energy  
Poker Lake Unit #213  
UL/P sec. 18, T24S R30E  
32.212785, -103.913933  
2RP – 4243, 2RP - 4265**

Mr. Bratcher:

XTO Energy (XTO) has retained Basin Environmental Service Technologies (Basin) to address potential environmental concerns at the above-referenced site.

### **Background and Previous Work**

The site is located approximately nine and two tenths (9.2) miles southeast of Malaga, New Mexico at Unit Letter P of Section 18 Township 24 South of Range 30 East. This site is located in an area where groundwater is anticipated to be at approximately one-hundred sixty-five (165) +/- feet below ground surface (bgs) (See Figure 1).

On May 27<sup>th</sup>, 2017, XTO discovered a release of approximately two (2) barrels (bbls) of crude oil and an estimated three (barrels) of produced water when the treater caught fire. No product from the release was recovered. Approximately three hundred (300) square feet (ft<sup>2</sup>) of pasture was impacted by fluids and an additional twenty-seven thousand five hundred (27,500) ft<sup>2</sup> of pasture was impacted by misted crude oil. New Mexico Oil Conservation Division (NMOCD) was notified of the release on May 28<sup>th</sup>, 2017, and an initial C-141 was submitted to NMOCD on June 8<sup>th</sup>, 2017, for approval.

On June 18<sup>th</sup>, 2017, XTO discovered and additional release of approximately twelve (12) bbls of crude oil when a valve was not shut off from the skim pump. An estimated ten (10) bbls were recovered. The release was entirely contained within the secondary containment of the facility. Approximately two-thousand six-hundred (2,600) ft<sup>2</sup> of the containment area was impacted. New Mexico Oil Conservation Division (NMOCD) was notified of the release on June 28<sup>th</sup>, 2017, and an initial C-141 was submitted to NMOCD on June 28<sup>th</sup>, 2017, for approval.

Basin personnel were on site beginning July 29<sup>th</sup>, 2017, to begin delineation activities. Seven (7) sample points were established. The sample points, (SP 1, SP 2, SP 3, SP 4, SP 5, SP 6, SP 7) from the release area were field tested for chlorides. (See Figure 2).

### **Corrective Action Plan**

Remediation is currently underway as there is an urgency to complete in order to rebuild the facility. Sampling and delineation is taking place in conjunction with remediation. All confirmatory samples retrieved for delineation as well as remediation both vertically and horizontally will be delivered to a NMOCD approved laboratory for chloride, TPH, and BTEX concentration analysis. If the NMOCD recommended limit for chloride concentration is not reached during the remediation process, a certified soil-bore installer will be used to located 250 mg/kg chloride within the soil profile.

At the completion of remediation and delineation, the location will be backfilled with clean, non-impacted caliche (gypsum), compacted, and contoured to the surrounding area.

Once completion of remediation is achieved and at a time conducive for germination, Basin will seed the impacted pasture area with a blend of native, non-noxious vegetation approved by the Bureau of Land Management (BLM). The seed will be applied with either a drill or broadcast method to ensure complete coverage of affected area. The seeds will then be sown with a disc (in compacted soils), rake or a harrow.

The supporting documentation for this Corrective Action Plan is attached.

Basin appreciates the opportunity to work with you on this project. Please contact me if you have any questions or wish to discuss the site.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Robbie Runnels', followed by a long horizontal line.

Robbie Runnels  
Project Manager  
Basin Environmental Service Technologies  
(575) 393-2967

Attachments:

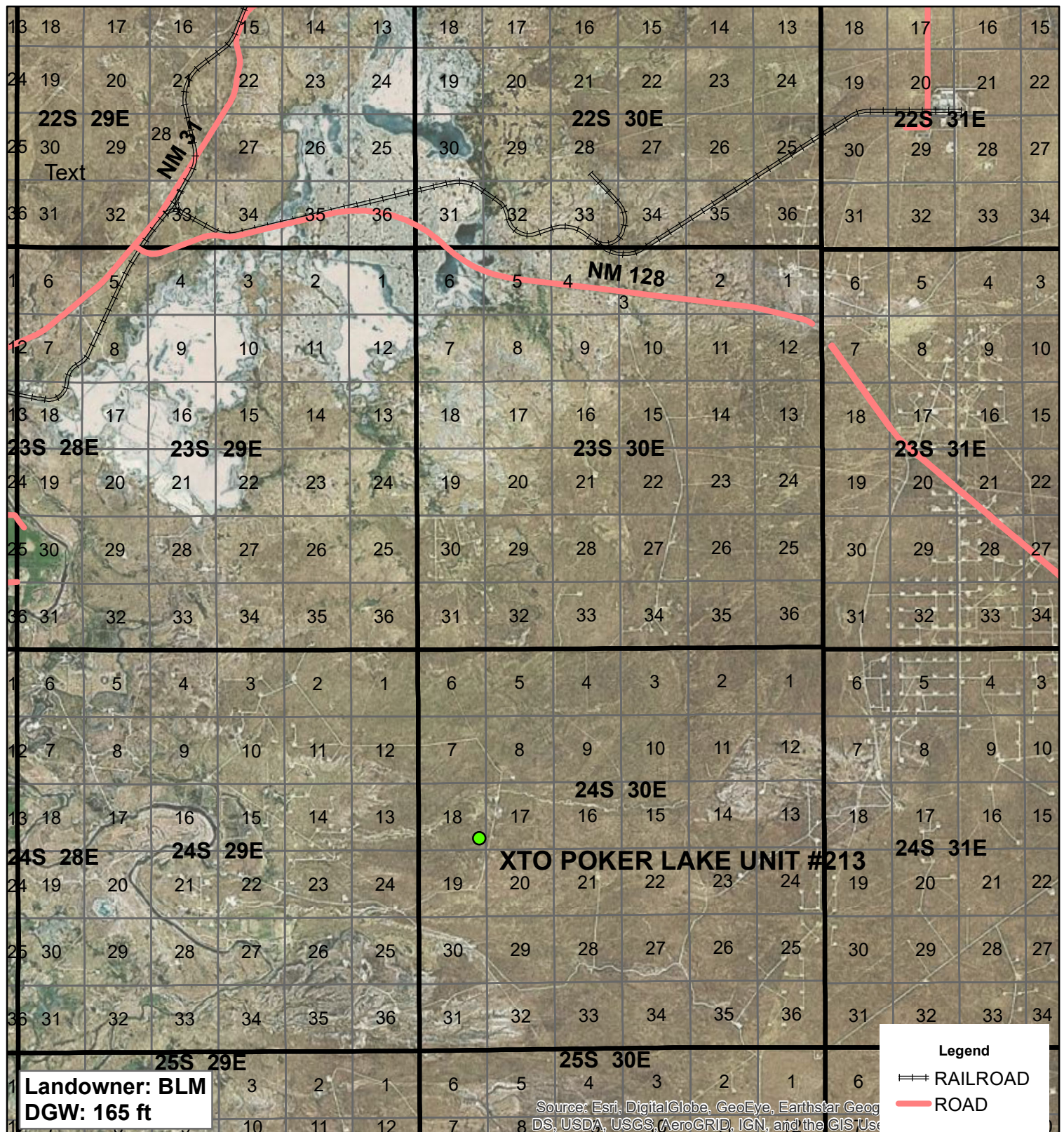
Figure 1 – Site Location Map

Figure 2 - Area Sampling Data  
Appendix A – Photo Documentation  
Appendix B – Laboratory Analysis  
Appendix C – Initial C-141

# FIGURES



# Geographic Location



## XTO POKER LAKE UNIT #213

UL P SECTION 18  
P-24-S R-30-E  
EDDY COUNTY, NM

GPS: 32.212792 -103.913928

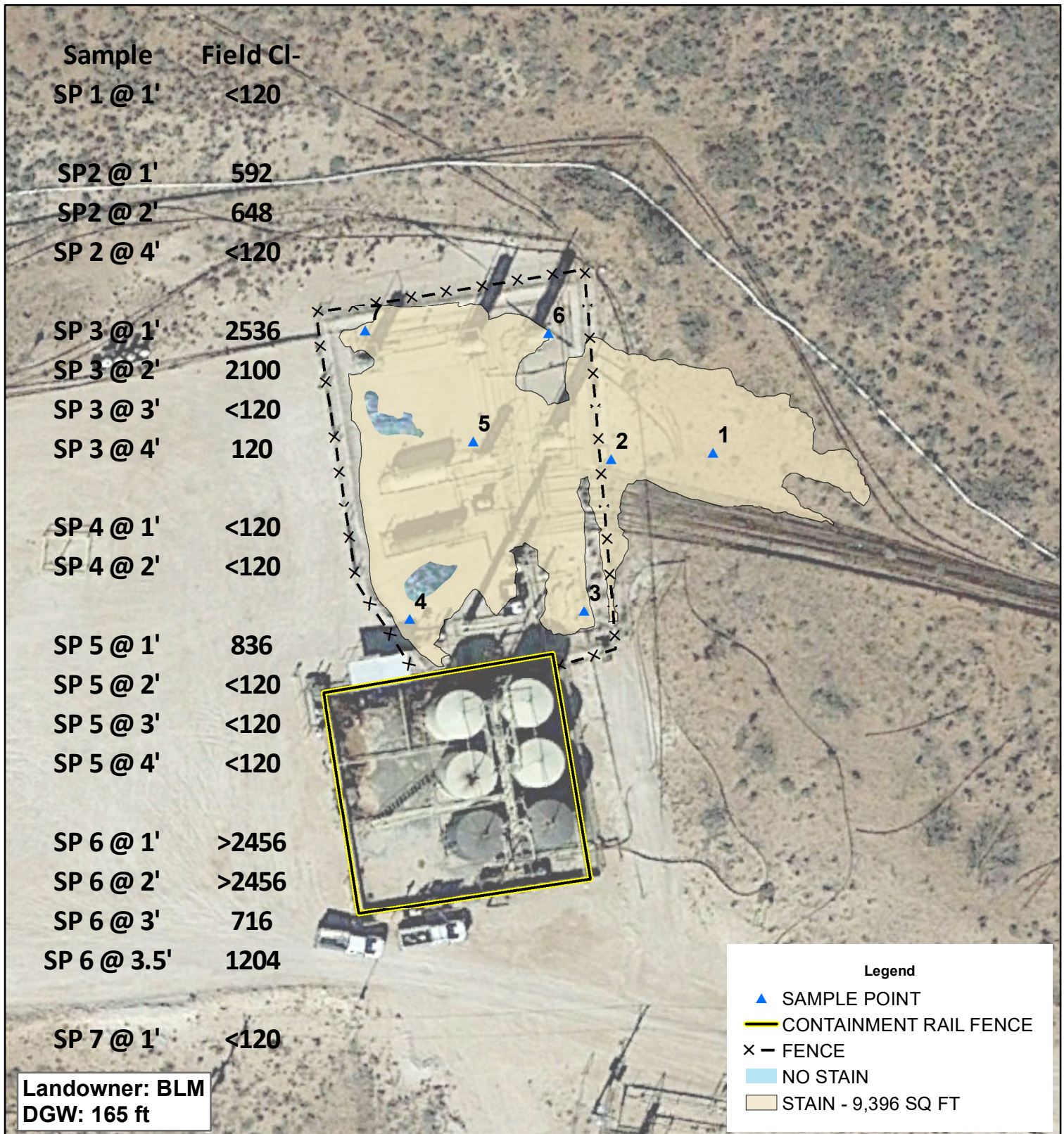
0 1 2  
Miles

Drawing date: 7/31/17  
Drafted by: T. Grieco





# Initial Sampling



## XTO POKER LAKE UNIT #213

UL P SECTION 18  
T-24-S R-30-E  
EDDY COUNTY, NM

Underground facilities are  
spatially projected  
and need to be field verified.

GPS: 32.212792 -103.913928

0 25 50  
Feet

GPS date: 7/28/17 TG  
Drawing date: 7/31/17  
Drafted by: T. Grieco



# APPENDICES

# APPENDIX – A

## Photo Documentation



# XTO Energy – Poker Lake Unit 213

Unit Letter P of Section 18, T24S, R30E



Release area, facing southeast

8/8/17



Release area, facing east

8/8/17



Excavation, facing southeast

8/15/17



Excavation, facing southeast

8/18/17

# APPENDIX – B

C-141

# NM OIL CONSERVATION

ARTESIA DISTRICT

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

JUN 07 2017

Form C-141  
Revised August 8, 2011

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

RECEIVED

## Release Notification and Corrective Action

NAB 1715428206 Bopco, LP

### OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: XTO Energy	Contact: Jacob Foust
Address: 522 W. Mermod, Suite 704 Carlsbad, N.M. 88220	Telephone No. 432-266-2663
Facility Name: Poker Lake Unit 213 Battery	Facility Type: Exploration and Production

Surface Owner: Federal	Mineral Owner: Federal	API No. 30-015-33859
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### LOCATION OF RELEASE

Unit Letter 8	Section 18	Township 24S	Range 30E	Feet from the 860	North/South Line South	Feet from the 660	East/West Line East	County Eddy
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Latitude 32.212856 Longitude-103.913909

### NATURE OF RELEASE

Type of Release Fire (crude oil and produced water)	Volume of Release 1.96 BPW, 3.39 BO	Volume Recovered None
Source of Release Heater treater	Date and Hour of Occurrence 5/27/17 time unknown	Date and Hour of Discovery 5/27/17 7:30 P.M.
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Mike Bratcher, Crystal Weaver (NMOCD), Jim Amos, Shelly Tucker (BLM)	
By Whom? Jacob Foust	Date and Hour 5/28/17, 11:00 A.M.	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. N/A	

If a Watercourse was Impacted, Describe Fully.\*  
N/A

Describe Cause of Problem and Remedial Action Taken.\*  
The battery's main heater treater ignited. The fire department was called and all the wells feeding into the battery were shut in. Estimating approximately 17 barrels of crude oil (in addition to the amount in the soil listed above) were lost to the fire from the main heater treater. The fire was extinguished at 11:30 P.M.

Describe Area Affected and Cleanup Action Taken.\*  
The main heater treater and nearby equipment were damaged. Approximately 300 square feet of pasture immediately east of the vessel containment area were affected by the fire and 27,500 square feet of pasture were affected by misted crude oil. MicroBlaze was applied to the affected pasture.

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: Jacob Foust	Approved by Environmental Specialist: <i>Crystal Weaver</i>	
Title: Environmental Supervisor	Approval Date: 6/8/17	Expiration Date: N/A
E-mail Address: Bryan_Foust@xtoenergy.com	Conditions of Approval: see attached	Attached <input checked="" type="checkbox"/>
Date:	Phone: 432-266-2663	

\* Attach Additional Sheets If Necessary

2RP-4243

# NM OIL CONSERVATION

ARTESIA DISTRICT

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 22 2017

Form C-141  
Revised August 8, 2011

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

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

RECEIVED

## Release Notification and Corrective Action

NAB 1718029380 (BOPCO)

### OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: XTO Energy #210737	Contact: Jacob Foust
Address: 522 W. Mermod, Suite 704 Carlsbad, N.M. 88220	Telephone No. 432-266-2663
Facility Name: Poker Lake Unit 213 Battery	Facility Type: Exploration and Production (SWD)

Surface Owner: Federal	Mineral Owner: Federal	API No. 30-015-33859
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### LOCATION OF RELEASE

Unit Letter P	Section 18	Township 24S	Range 30E	Feet from the 860	North/South Line South	Feet from the 660	East/West Line East	County Eddy
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Latitude 32.212856 Longitude 103.913909

### NATURE OF RELEASE

Type of Release Crude oil	Volume of Release 12.3 bbl	Volume Recovered 10 bbl
Source of Release Free water knockout	Date and Hour of Occurrence 6/18/2017, A.M.	Date and Hour of Discovery 6/18/2017, 10:00 A.M.
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom? N/A	
By Whom? N/A	Date and Hour N/A	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. N/A	

If a Watercourse was Impacted, Describe Fully.\*  
N/A

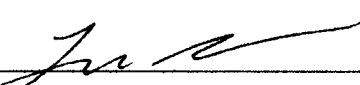
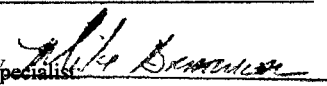
#### Describe Cause of Problem and Remedial Action Taken.\*

Skim pump was turned on, sending oil into flow line. A valve was not shut off on the battery side, causing oil to spill onto the ground. The valve was shut and locked.

#### Describe Area Affected and Cleanup Action Taken.\*

Approximately 2600 square feet inside the caliche containment was impacted. All fluid was contained in the berm. This spill was all within the area affected last month by 2RP-4243, so it will be remediated along with that spill.

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: Jacob Foust		Approved by Environmental Specialist 	
Title: Environmental Supervisor	Approval Date: 6/28/17	Expiration Date: N/A	
E-mail Address: Bryan.Foust@xtoenergy.com	Conditions of Approval: See attached		Attached <input type="checkbox"/>
Date: Phone: 432-266-2663			

\* Attach Additional Sheets If Necessary

Please refer to the New Mexico Oil  
Conservation Division Website for  
updated form(s) at:  
[http://www.emnrd.state.nm.us/  
OCD/forms.html](http://www.emnrd.state.nm.us/OCD/forms.html)  
Thank you

2RP-4265