

From: [Weaver, Crystal, EMNRD](#)
To: ["dan.jones@premieroilgas.com"](mailto:dan.jones@premieroilgas.com)
Cc: [Bratcher, Mike, EMNRD](#); stucker@blm.gov
Subject: RE: Release - Premier O & G * Parke A Tract 1 #16 * 2RP-7264
Date: Thursday, August 17, 2017 10:44:00 AM

Daniel,

I would strongly recommend hiring a 3rd party contractor to work this remediation regarding this release. If that is not of your preference then I would suggest looking on OCD's public online website where all documents that others have submitted for past and present releases are on file for you to review and hopefully find some understanding of how other operators submit the requested information.

<http://ocdimage.emnrd.state.nm.us/imaging/AEOrderCriteria.aspx>

Thanks,

Crystal Weaver

Environmental Specialist
OCD – Artesia District II
811 S. 1st Street
Artesia, NM 88210
Office: 575-748-1283 ext. 101
Cell: 575-840-5963
Fax: 575-748-9720

From: dan.jones@premieroilgas.com [mailto:dan.jones@premieroilgas.com]
Sent: Thursday, August 17, 2017 10:07 AM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Subject: RE: Release - Premier O & G * Parke A Tract 1 #16 * 2RP-7264

Crystal,

Do you have a sample worksheet for the work characterization plan that is submitted or is this usually just a word doc?

From: Weaver, Crystal, EMNRD [mailto:Crystal.Weaver@state.nm.us]
Sent: Thursday, August 17, 2017 9:53 AM

To: dan.jones@premieroilgas.com

Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Cordero, Gilbert, EMNRD <Gilbert.Cordero@state.nm.us>; stucker@blm.gov; ken.jones@premieroilgas.com

Subject: RE: Release - Premier O & G * Parke A Tract 1 #16 * 2RP-7264

Hello Daniel,

Thank you and Mark for providing your photos. I was out there yesterday and I did see the liner for myself (attached above are some images that I took from yesterday IMG 7441, 7439, 7433, and 7435). However, I noticed a very large amount of still very wet production fluids (some of it was gloopy dark black) all around directly underneath your new base coarse material. Especially very saturated around the tanks. OCD will require that all fluid within the lined area from the original spill to be fully resolved, however, if all fluids were originally removed then it would appear that there is a leak of some sort that is creating the standing fluid thus we would need Premier O & G to look into that.

Following your resolution of the wet fluids standing on the liner here is what needs to be done and stated by Premier O & G:

- According to image DSC08890, (from our OCD Inspector) which I have attached above, fluids made it outside of the bermed area and have impacted vegetation. OCD will require sampling for all around that area and some plan of action for resolving the impacted area (please consult the COAs document that was sent to you with your signed C-141 we return emailed you).
- When the Final C-141 is submitted we need to see stated on the form that the liner was fully inspected and that you all attest to the liner's full integrity.
- If you could provide the final volume (in yards or some other volume unit i.e. cubic feet or tons etc.) of the soil/gravel/base coarse fill material (on top of the liner) that you all removed that was contaminated.

That should give you an idea on how to start proceeding forward with this remediation.

If you have any questions or concerns please contact myself or Mike Bratcher here at the District II OCD Office.

Thank you,

Crystal Weaver

Environmental Specialist

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From: dan.jones@premieroilgas.com [<mailto:dan.jones@premieroilgas.com>]
Sent: Wednesday, August 16, 2017 6:26 PM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Cordero, Gilbert, EMNRD <Gilbert.Cordero@state.nm.us>; stucker@blm.gov; ken.jones@premieroilgas.com
Subject: RE: Release - Premier O & G * Parke A Tract 1 #16 * 2RP-7264

Hi Crystal,
Mark took a couple of pictures showing the liner underneath. The liner runs underneath the whole area within the berms along with the tanks. Mark noticed someone had been out there recently to take a look.
Let us know how you would like to proceed.
Dan

From: Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]
Sent: Tuesday, August 15, 2017 10:32 AM
To: dan.jones@premieroilgas.com
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Cordero, Gilbert, EMNRD <Gilbert.Cordero@state.nm.us>; stucker@blm.gov
Subject: RE: Release - Premier O & G * Parke A Tract 1 #16 * 2RP-7264

Daniel,

I have affixed some of the photos from when our inspector was out on site at the time of when your crew was responding to this release. In the photographs I am having a very hard time seeing any sign of a liner. The area around the battery does appear to be bermed. If you can please provide photo documentation that shows reference that you are present at the Parke A Tract 1 #16 site and proves existence of this liner then we can proceed moving this project forward to the next step. Please note that all information shared with OCD that is pertinent to this case is available to the public and cases that are not being resolved or operators that are not conducting themselves in accordance to the rules and regulations may be reported to our legal council out of the OCD Office in Santa Fe.

If you look back on the original email I sent you (that the photos I am attaching are from) notifying you that our OCD inspector was onsite on 6/16/17 and had spoken with your crew. Our inspector states in his write up that he provided that, "Attached are pictures of the Premier O & G, Dale H. Parke "A" TR 1 #16. This well is the first well east of Loco Hills on the south side of the road. I was

told that they were going to get the fluid out of the containment area and refill with gravel. There is no liner."

Crystal Weaver

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From: dan.jones@premieroilgas.com [<mailto:dan.jones@premieroilgas.com>]
Sent: Tuesday, August 15, 2017 8:38 AM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Subject: RE: Release - Premier O & G * Parke A Tract 1 #16 * 2RP-7264

Crystal,
Apologies for my tardiness in replying to this issue as I have been out of town for some time and just getting back in to address this.

I have received the COA in regards to this release. I'm not exactly sure how to address some of it as the COA seems to want us to gather soil samples at the site of the release. Since, the release was contained in the dyke which was gravel and has a liner, all the gravel was removed, and the release was contained by the liner. Hence, no ground soil was contaminated. Please advise how you would like me to prepare a plan for this. Feel free to contact me on my cell.

Daniel Jones
817-614-4224

From: Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]
Sent: Friday, July 14, 2017 3:24 PM
To: dan.jones@premieroilgas.com
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; 'Tucker, Shelly' <stucker@blm.gov>
Subject: RE: Release - Premier O & G * Parke A Tract 1 #16 * 2RP-7264

RE: Premier O & G * Parke A Tract 1 #16 * 30-015-30457 * 2RP-7264

Daniel,

I have included a scanned copy of the signed Initial C-141 Remediation Permit along with an attached Conditions of Approval (COA). The OCD tracking number for this event is 2RP-4264. What I

have attached is your originally submitted initial C-141 that came in on 6/26/17, because it is tied to your COA document that is attached which within the COA you are assigned a due date of 7/26/17 by which the OCD needs to receive a work plan for characterization of impacts associated with this release. However, the amended version of the initial C-141 form that you sent in on 7/10/17 has been added to the case number as the most current version.

Thank you,

Crystal Weaver

Environmental Specialist

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From: Daniel Jones [<mailto:dan.jones@premieroilgas.com>]

Sent: Monday, July 10, 2017 2:41 PM

To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Subject: RE: Release - Premier O & G * Parke A Tract 1 #16 * 2RP-7264

Yeah that's a typo. Sorry about that.

From: Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]

Sent: Monday, July 10, 2017 3:15 PM

To: dan.jones@premieroilgas.com

Cc: Tucker, Shelly; Bratcher, Mike, EMNRD

Subject: RE: Release - Premier O & G * Parke A Tract 1 #16 * 2RP-7264

Hello Daniel,

Yes we have it in the "mail received" inbox up front. Thank you. We usually get most C-141 forms via email so that is why I didn't notice it was received until now. I have it in my hand and I am looking at it and it says that your release occurred on 3/16/17, I am confused. Our inspector was out on site on 6/16/17 where he saw your crew working on immediate response efforts, perhaps the date of 3/16/17 is a typo? If so could you please correct it and resend the C-141 via email if possible. If not then mail submission is fine as well.

Thank you,

Crystal Weaver

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From: Daniel Jones [<mailto:dan.jones@premieroilgas.com>]
Sent: Monday, July 10, 2017 9:18 AM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Subject: RE: Release - Premier O & G

Crystal,

I've been out of town since June 30th. I mailed the C-141 on June 21st. Have you received it?
Daniel

From: Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]
Sent: Friday, June 30, 2017 4:33 PM
To: dan.jones@premieroilgas.com
Cc: Bratcher, Mike, EMNRD; Cordero, Gilbert, EMNRD; Podany, Raymond, EMNRD
Subject: RE: Release - Premier O & G

Daniel,

Just wanted to follow up with you regarding this release and my request for a C-141 on the matter. Your last day to turn in the C-141 would be **tomorrow 7/1/17**. Please get that to us by no later than that date. Submission via email attachment of the form C-141 to both myself and Mike Bratcher would be much appreciated.

Thank you,

Crystal Weaver

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811 S. 1st Street

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Office: 575-748-1283 ext. 101
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From: Daniel Jones [<mailto:dan.jones@premieroilgas.com>]
Sent: Tuesday, June 20, 2017 6:40 AM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Cordero, Gilbert, EMNRD <Gilbert.Cordero@state.nm.us>; Podany, Raymond, EMNRD <Raymond.Podany@state.nm.us>
Subject: RE: Release - Premier O & G

That answers it. Thanks for the explanation.

From: Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]
Sent: Monday, June 19, 2017 4:07 PM
To: dan.jones@premieroilgas.com
Cc: Bratcher, Mike, EMNRD; Cordero, Gilbert, EMNRD; Podany, Raymond, EMNRD
Subject: RE: Release - Premier O & G

Hello Mr. Jones,

I don't recall calling it specifically an oil spill.

Let me try to reiterate what I did say: OCD requires that any oil production fluids that make contact with ground/surface/vegetation/atmosphere (dry gas release) etc. be reported and cleaned/remediated to OCD standards. Because fluids are sometimes a mix of different things it does state in the COAs (that I attached for you in the last email) that samples from releases will be tested by a NELAP certified lab for at minimum the following constituents "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."

Therefore the next step in the process would be to submit the C-141 form and following that a delineation/work plan proposal. I will suggest this, unless you have someone onboard that is experienced in proper methodologies for obtaining samples, providing sites diagrams, data analysis and tables, etc. I would strongly suggest retaining a third party environmental company.

I hope I have answered your question.

If you have any further questions or concerns please contact myself or Mike Bratcher here at the OCD District II Office.

Crystal Weaver

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From: Daniel Jones [<mailto:dan.jones@premieroilgas.com>]
Sent: Monday, June 19, 2017 10:27 AM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Cordero, Gilbert, EMNRD <Gilbert.Cordero@state.nm.us>; Podany, Raymond, EMNRD <Raymond.Podany@state.nm.us>
Subject: RE: Release - Premier O & G

Crystal,
I'm confused. The A16 is a disposal well. The fluid ought to be Yeso water. This is reported as an oil spill?
Daniel

From: Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]
Sent: Friday, June 16, 2017 3:40 PM
To: dan.jones@premieroilgas.com
Cc: Bratcher, Mike, EMNRD; Cordero, Gilbert, EMNRD; Podany, Raymond, EMNRD
Subject: FW: Release - Premier O & G

Premier Oil and Gas, Inc. * Dale H Parke "A" Tract 1 #16 * 30-015-30457

Hello Daniel,

Today an OCD representative was on site at the Premier Oil and Gas, Inc. Dale H Parke "A" Tract 1 #16 where an oil production fluid release had occurred. OCD was told by the crew members that were on site that they were going to remove the fluid and contaminated soil/gravel out of the area and then replace it with other gravel.

Although immediate response to a release is authorized and encouraged by OCD, the proper procedures and steps need to then be followed so that you are in compliance with OCD remediation standards. Please provide a C-141 form documenting this spill. This site appears to be on federal land therefore the BLM will need to be notified of the spill as well. To provide some insight to the

compliance standards OCD expects I have attached a blank copy of our Conditions of Approval Form (COA) as you requested. You will receive another copy of the COAs again, with info and due dates on it that will relate to this specific release, following after your submission of the required C-141 form.

Here is the link to our website and the page on our site where a list of downloadable OCD forms is provided. Please download and utilize the PDF version of the C-141 form it is easier for both parties to work with.

<http://www.emnrd.state.nm.us/OCD/forms.html>

If you have any questions or concerns please contact myself or Mike Bratcher here at the OCD District II Office.

Please note: When you do send in any correspondence regarding this release we prefer that it be sent in via email to both myself and Mr. Bratcher (mike.bratcher@state.nm.us).

Thank you,

Crystal Weaver

Environmental Specialist

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From: Cordero, Gilbert, EMNRD

Sent: Friday, June 16, 2017 10:48 AM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: Podany, Raymond, EMNRD <Raymond.Podany@state.nm.us>

Subject: Release - Premier O & G

Attached are pictures of the Premier O & G, Dale H. Parke "A" TR 1 #16. This well is the first well east of Loco Hills on the south side of the road. I was told that they were going to get the fluid out of the containment area and refill with gravel. There is no liner. The release had just happened this morning

Thanks,

Gilbert Cordero
Staff Manager
NMOCD District II
Office 575.748.1283 ext.114
Cell 575.626.0830