



May 22, 2019

Mike Bratcher
New Mexico Energy, Minerals & Natural Resources Oil Conservation Division,
Environmental Bureau - District 2
811 S. First St.
Artesia, NM 88210

RE: Work Plan

Burnett Oil Co., Inc. – Grayburg Jackson San Andreas Unit 0022 Inj. Well
UL/L sec. 14 T17S R30E

Mr. Bratcher

The above location is located approximately 2 miles northeast of Loco Hills, New Mexico at UL/L sec. 14 T17S R30E (API# 30-015-04148). The site is located in an area of no known groundwater.

On February 26, 2019, a release was discovered a release of 30 barrels of total fluid. The release occurred when a steel injection flowline ruptured, releasing fluid in the pasture approx. 220' East of the Gissler A #37 well location. The area impacted is 150'x2'-40' area in the pasture and on the pad. The BLM and the NMOCD were both notified of the release on February 26, 2019 with the initial C-141 being filed later that same day.

Corrective Action Plan

On February 27, 2018 Burnett Oil Co., Inc. sampled the impacted area, and took the samples to an accredited lab for analytical analysis. Soil borings were also performed within the release footprint, to obtain delineation data. To remediate the impacted soil, Burnett Oil Co., Inc. enlisted the services of Aspen Grow LLC. to apply Probiotic compounds to the impacted area. The probiotics will be applied with fresh water to the impacted area once a week for four weeks. In that time the probiotics and the fresh water will be able to begin remediating the

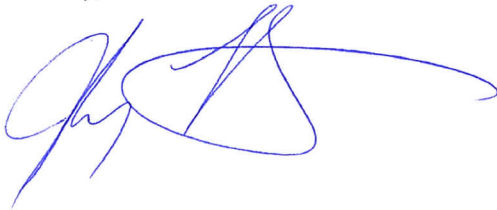
May 22, 2019

hydrocarbons in the impacted area. The impacted area of will be sampled at the end of the probiotic application. Pending the results of the analytical, further application could be required.

Following the approval of the plan, Burnett Oil Co., Inc. will begin remediating the impacted area to Regulatory standards. The initial remediation will take a total of 56 days, with the potential for another 56 days for a total of 112 days of remediation. Burnett Oil Co., Inc. requests an extension of time, to perform this remediation as stated earlier in the work plan.

Please feel free to contact me with any questions concerning this remediation plan request.

Sincerely,



Johnny Titsworth, GSP
HSE Coordinator
Burnett Oil Co., Inc.
P.O. Box 188 / CR 220 North
Loco Hills, NM 88255
(432)-425-2891
Email: jtitsworth@burnettoil.com

Incident ID	
District RP	2RP-5286
Facility ID	
Application ID	

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?

>300' (ft bgs)

Did this release impact groundwater or surface water?

☐ Yes ☒ No

Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?

☐ Yes ☒ No

Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?

☐ Yes ☒ No

Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?

☐ Yes ☒ No

Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?

☐ Yes ☒ No

Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?

☐ Yes ☒ No

Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?

☐ Yes ☒ No

Are the lateral extents of the release within 300 feet of a wetland?

☐ Yes ☒ No

Are the lateral extents of the release overlying a subsurface mine?

☐ Yes ☒ No

Are the lateral extents of the release overlying an unstable area such as karst geology?

☐ Yes ☒ No

Are the lateral extents of the release within a 100-year floodplain?

☐ Yes ☒ No

Did the release impact areas **not** on an exploration, development, production, or storage site?

☐ Yes ☒ No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

Characterization Report Checklist: *Each of the following items must be included in the report.*

- ☒ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☒ Field data
- ☒ Data table of soil contaminant concentration data
- ☒ Depth to water determination
- ☒ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- ☒ Boring or excavation logs
- ☒ Photographs including date and GIS information
- ☒ Topographic/Aerial maps
- ☒ Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

State of New Mexico
Oil Conservation Division

Incident ID	
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I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.

Printed Name: Johnny Titsworth Title: HSE Coordinator

Signature:  Date: 5/22/19

email: jtitsworth@burnettoil.com Telephone: (432)-425-2891

OCD Only

Received by: _____ Date: _____

Incident ID	
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Remediation Plan

Remediation Plan Checklist: *Each of the following items must be included in the plan.*

- ☒ Detailed description of proposed remediation technique
- ☒ Scaled sitemap with GPS coordinates showing delineation points
- ☐ Estimated volume of material to be remediated
- ☐ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☒ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- ☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- ☐ Extents of contamination must be fully delineated.
- ☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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Printed Name: Johnny Titsworth Title: HSE Coordinator

Signature:  Date: 5/22/19

email: jtitsworth@burnettoil.com Telephone: 432-425-2891

OCD Only

Received by: _____ Date: _____

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: _____ Date: _____

GJSAU 22Inj. Line

2.26.19 release footprint

Gissler A 37

Gissler

Legend

- Release Footprint
- Sample Locations
- Soil Boring Locations
- Well Locations

SP-3

SB-2

SP-2

SB-1

SP-1



100 ft

GJSAU 22 Eng Line

2/26/19

N

GJSAU 22 Trk Line

SP-3

SP-2

SP-1

Leak Source



New Mexico Office of the State Engineer

Water Column/Average Depth to Water

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest) (NAD83 UTM in meters)

No records found.

PLSS Search:

Section(s): 14

Township: 17S

Range: 30E

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

2/27/19 3:00 PM

WATER COLUMN/ AVERAGE

DEPTH TO WATER

Table 1 - Analytical Results

Date	Sample ID	Depth	Chloride	TPH - GRO	TPH - DRO	TPH-Total	Benzene	Toluene	Ethylbenzene	Xylene	BTEX
2/27/2019	SP-1	0-1'	17000	6.1	ND	6	0.18	0.21	0.13	0.12	0.64
2/27/2019	SP-1	1'-2'	770								
2/27/2019	SP-1	2'-3'	1000								
2/27/2019	SP-1	3'-4'	1100								
2/27/2019	SP-1	4'-5'	1200								
2/27/2019	SP-1	5'-6'	1200								
2/27/2019	SP-1	6'-7'	1900								
2/27/2019	SP-1	7'-8'	2200								
2/27/2019	SP-2	0-1'	8500	ND	ND	ND					
2/27/2019	SP-2	1'-2'	8700								
2/27/2019	SP-2	2'-3'	8500								
2/27/2019	SP-2	3'-4'	8500								

Table 1 - Analytical Results

Date	Sample ID	Depth	Chloride	TPH - GRO	TPH - DRO	TPH-Total	Benzene	Toluene	Ethylbenzene	Xylene	BTEX
2/27/2019	SP-2	4'-5'	8200								
2/27/2019	SP-2	5'-6'	9700								
2/27/2019	SP-2	6'-7'	10000								
2/27/2019	SP-2	7'-8'	11000								
2/27/2019	SP-2	8'-9'	11000								
2/27/2019	SP-3	0-1'	6800	ND	ND	ND					
2/27/2019	SP-3	1'-2'	8500								
2/27/2019	SP-3	2'-3'	9100								
2/27/2019	SP-3	3'-4'	7900								
2/27/2019	SP-3	4'-5'	2200								
2/27/2019	SP-3	5'-6'	1300								
2/27/2019	SP-3	6'-7'	1200								

Company Name:	Burnett
Location Name:	GJSAU #22

SP Date: _____
Rel Date: _____

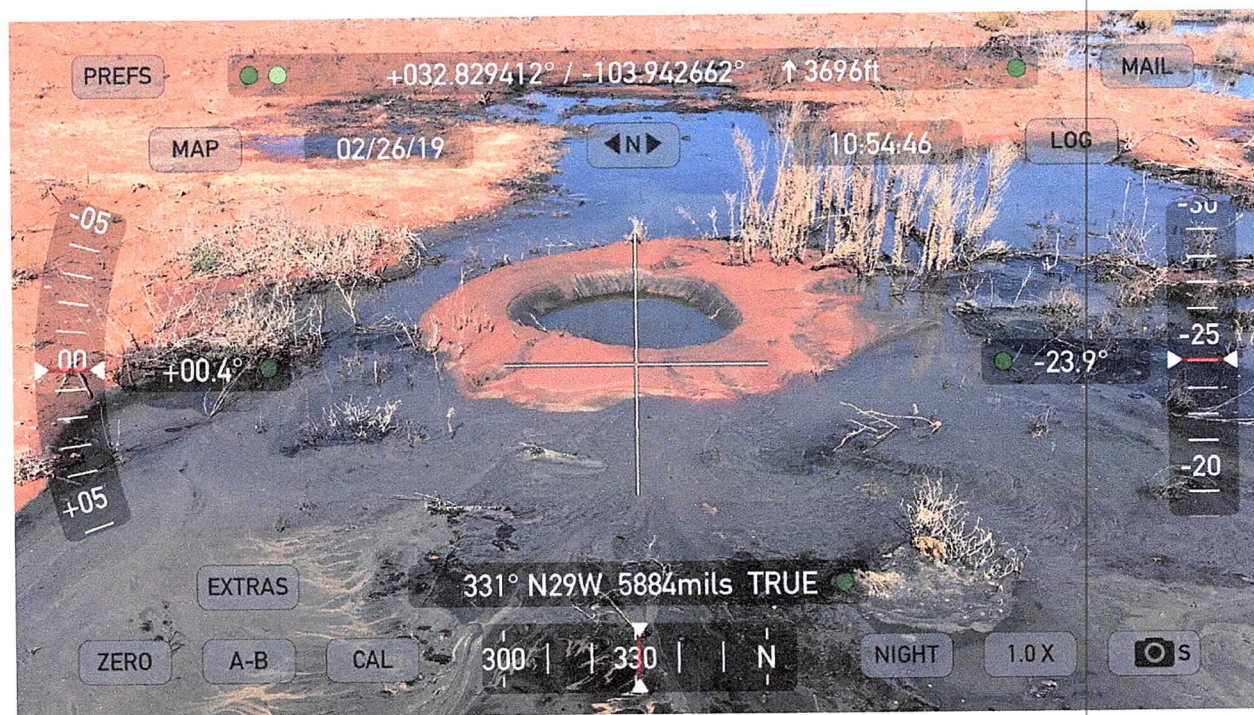
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Lab Confirmation Sample
Field Sampling
Needs Delineation and confirmation samples



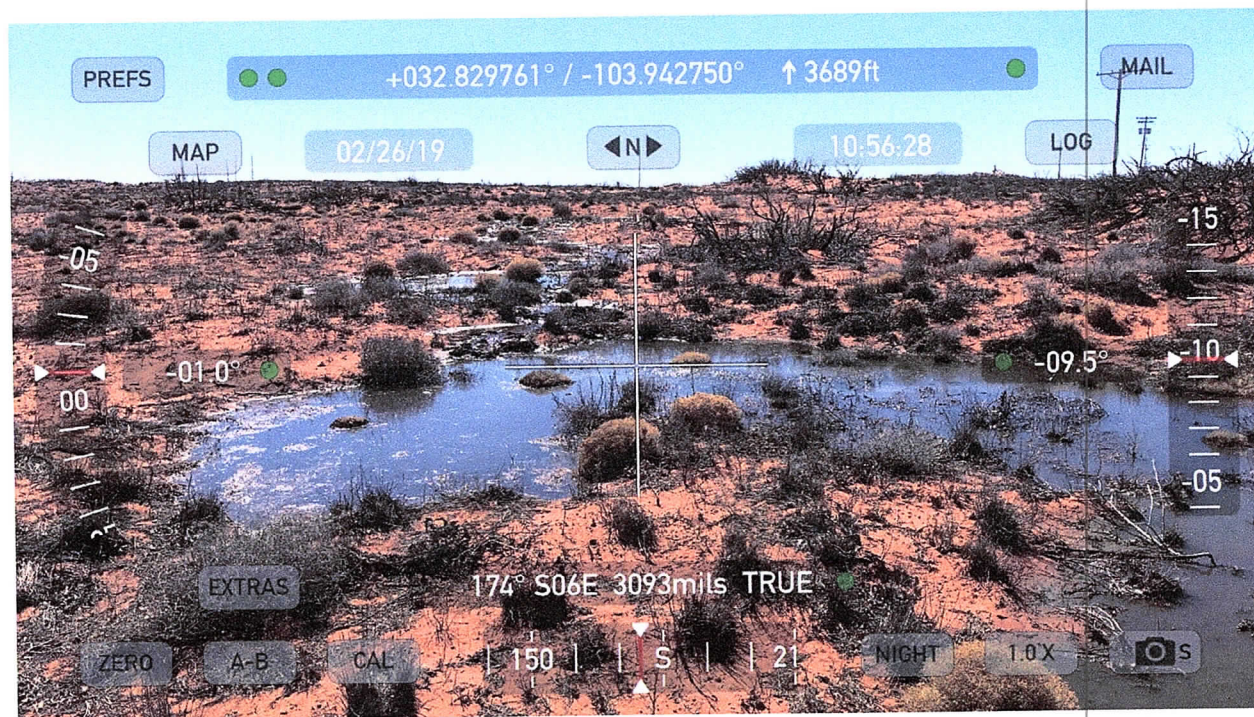
Looking North. Release point, buried flowline corroded. Area of SP-1 & SB-1



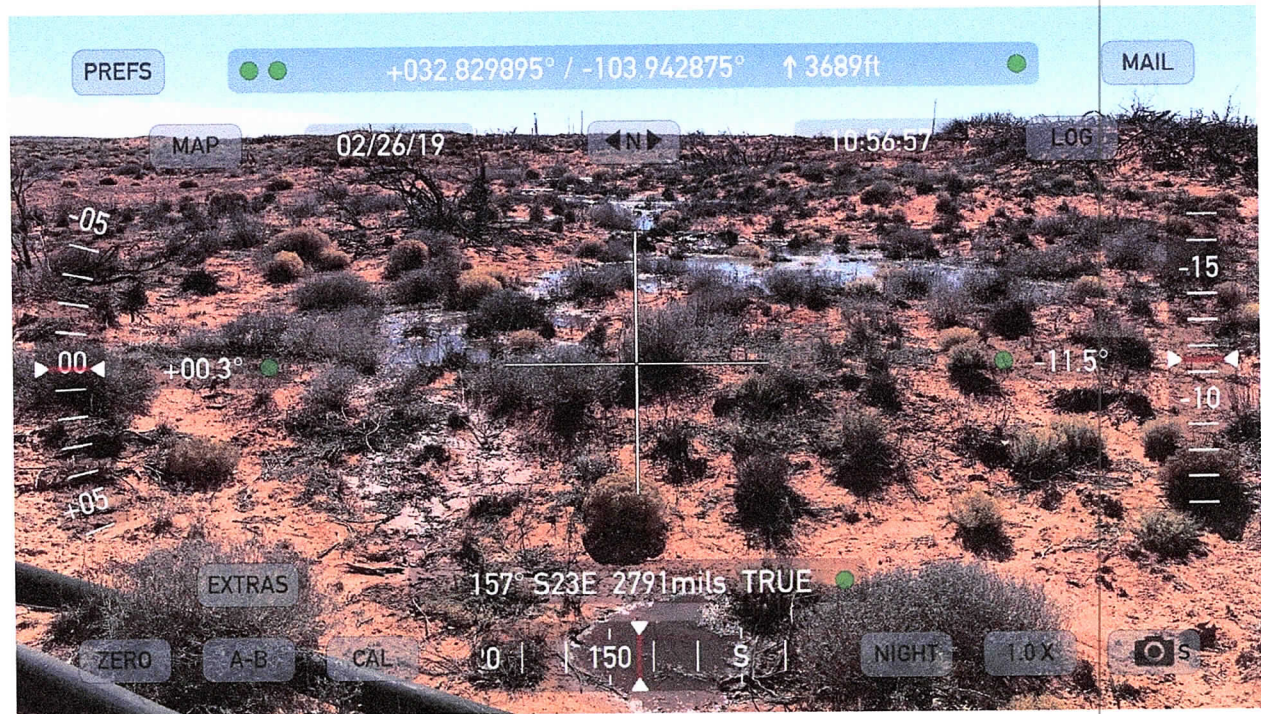
Release point. Area of SP-1 & SP-2



Looking South, at the middle section of the release footprint. Area of SP-2



Looking South. Area of SP-2



Looking South, at the end section of the release footprint. Area of SP-3 & SB-2

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

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	
District RP	2 RP-5286
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party: Burnett Oil Co., Inc.	OGRID
Contact Name: Johnny Titsworth	Contact Telephone: (432) 425-2891
Contact email: jtitsworth@burnettoil.com	Incident # (assigned by OCD)
Contact mailing address: P.O. Box 188 Loco Hills, NM 88255	

Location of Release Source

Latitude 32.829412 Longitude -103.942662
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Grayburg Jackson San Andreas Unit 22 Inj. line	Site Type: pasture
Date Release Discovered: 2/26/2019	API# (if applicable): 30-015-04148

Unit Letter	Section	Township	Range	County
L	14	17S	30E	Eddy

Surface Owner: ☐ State ☒ Federal ☐ Tribal ☐ Private (Name: _____)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input checked="" type="checkbox"/> Crude Oil	Volume Released (bbls): skim	Volume Recovered (bbls): 0 BBLS
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls): 30 BBLS	Volume Recovered (bbls): 0 BBLS
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

Steel Injection line going to the GJSAU 22 Injection Well corroded and release 100 BBLS of total fluid into pasture. The release was approx. 220' East of the Gissler A 37 well location (30-015-38247).

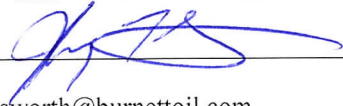
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Was this a major release as defined by 19.15.29.7(A) NMAC? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? The release was over 25 bbls of total fluid
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? Notification was given to Mike Bratcher (OCD) & Shelly Tucker (BLM) on the day of the release	

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why: The release is in an ARC area, and we are waiting on direction from BLM	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.	
Printed Name: <u>Johnny Titsworth</u> Title: <u>HSE Coordinator</u> Signature:  Date: <u>2/27/19</u> email: <u>jtitsworth@burnettoil.com</u> Telephone: <u>432-425-2891</u>	
<u>OCD Only</u> Received by: _____ Date: _____	