<u>District I</u> 1625 N. French Dr., Hobbs, NM 88240 <u>District II</u> 811 S. First St., Artesia, NM 88210 <u>District III</u> 1000 Rio Brazos Road, Aztec, NM 87410 <u>District IV</u> 1220 S. St. Francis Dr., Santa Fe, NM 87505				Energy Mi Oil C	nerals Conse	s and Natura ervation Div	St. Francis Dr.					Form C-141 Revised August 8, 2011 ropriate District Office in ce with 19.15.29 NMAC.		
Release Notification and Corrective Action														
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Name of Co	Name of Company WPX Energy Inc/RKI 246289						OPERATORInitial ReportFinal ReportContactKarolina Blaney							
Address		uena Vista Di	r.		-	Telephone No. 970 589 0743								
Facility Na						Facility Type: Well Pad								
Surface Ow	ner: Fede	ral		Mineral C)wner:	Federal API No. 30- 015-41978								
LOCATION OF RELEASE														
Unit Letter	Section	Township	Range	Feet from the	Nortl	h/South Line	Feet from the	n the East/Wes		County				
К	27	265	30E	1650		FSL	1650	FWI	FWL Eddy					
Latitude: 32.01284N Longitude: 103.87202W NATURE OF RELEASE														
Type of Rele	ase. Produc	ed Water and			Volume of Release: 5 Bbls Volume Recovered: 3 Bbls									
Source of Re Flowline	lease			Date and H 4/2/2017	Date and Hour of OccurrenceDate and Hour of Discovery4/2/20174/2/2017 - 9:30 hrs MT					ry				
Was Immediate Notice Given?						If YES, To Whom?								
By Whom? Karolina Blaney						Date and Hour: 4/2/17-3:03 hrs MT								
Was a Watercourse Reached?						If YES, Vo N/A	olume Impacting	he Waterco	ourse.					
If a Watercov	If a Watercourse was Impacted, Describe Fully.* N/A													
	urse was m	ipacieu, Desci	ibe Fully.	1 IVA										
Describe Cau	use of Prob	lem and Reme	dial Actio	n Taken.*										
	The spill was caused by equipment failure; corroded flowline. Approximately 5 bbls of oil and water was spilled off location with 3 bbls recovered from the impacted area. The spill occurred north of the RDU 57 well pad and migrated ~30-40' west of the access road.													
Describe Are	ea Affected	and Cleanup A	Action Tal	ken.*				P						
Describe Area Affected and Cleanup Action Taken.* The impacted area was mapped with a Trimble. With BLM's permission, the impacted soil was excavated and will be hauled off for disposal. The impacted area was sampled for BTEX, TPH, and chlorides in accordance with NM OCD Guidelines for Remediation of Leaks, Spills, and Releases. Further remediation will be based on these results.														
regulations a public health should their or the enviro	Il operators or the environment operations lonment. In a	are required t ironment. The have failed to a	o report a acceptan adequatel DCD acce	e is true and comp nd/or file certain r ce of a C-141 repo y investigate and r ptance of a C-141	elease ort by t emedia	notifications as he NMOCD m ate contaminati	nd perform correct arked as "Final R ion that pose a thu	ctive actions eport" does reat to grour	s for rel not rel nd wate	eases which ieve the ope r, surface w	n may en erator of ater, hui	idanger Tiability man health		
Signature:						OIL CONSERVATION DIVISION Approved by Environmental Specialist:								
Printed Nam	a Blaney		<u></u>											
Title: Environmental_Specialist						Approval Date: 41111 Expiration Date: N/A								
E-mail Address: Karolina.blaney@wpxenergy.com						Conditions of Approval: See attachment Attached &								
Date: 4-13-		TC NI		970-589-0743		yu yu			~ ~		<u>`</u>			
* Attach Add	nionai She	ets II Necess	sary							24	59-2	4171		

Operator/Responsible Party,

The OCD has received the form C-141 you provided on **4/13/17** regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number **2 kp 4 1 been** has been assigned. **Please refer to this case number in all future correspondence.**

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

The responsible person shall complete <u>division-approved corrective action</u> for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC. [emphasis added]

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District II office in Artesia on or before 5/13/17. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

• Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: 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. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.

• Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: 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. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.

• Nominal detection limits for field and laboratory analyses must be provided.

• Composite sampling is not generally allowed.

• Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

•Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.

• If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.

• Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.

Jim Griswold OCD Environmental Bureau Chief 1220 South St. Francis Drive Santa Fe, New Mexico 87505 505-476-3465 jim.griswold@state.nm.us