Wells B-1 Fed Well #4-I (Located in SECTION 1, T25S, R36E of Lea County, NM) (GPS Reading of 32°-09'-26.8"-N & 103°-12'-44.8"-W)

Spill Remediation Report

Presented to:

Prime Operating Company

Tgaar Petroleum Center 3300 "A" Bldg. 1-238 Midland, Texas 79705

Prepared by:

Phoenix Environmental, LLC. P.O. Box 1856 Hobbs, New Mexico 88240

Prime#18099 Incident - nPACOGOUT29547 application pPACOGOUT29547



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON Governor Joanna Prukop Cabinet Secretary Mark E. Fesmire, P.E. Director Oil Conservation Division

February 13, 2006

Prime Operating Co., (Prime) Tgaar Petroleum Center 3300 "A" Bldg 1-238 Midland, TX 79705

Facility Name:

Well B-1 Fed Well #4-I, Sec. 1-T25S-R36E

The New Mexico Oil Conservation Division, (NMOCD), environmental personnel have reviewed the closure plan submitted by Phoenix Environmental for Prime and referenced above. The plan is **hereby** approved according to the information provided.

Please be advised that OCD approval of this plan does not relieve Prime of liability should their operations fail to adequately investigate and remediate contaminants that that threaten ground water, surface water, human health or the environment. In addition, OCD approval does not relieve Prime of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions or need assistance please contact: mailto:psheeeley@state.nm.us

Sincerely,

Paul Sheeley-Environmental Engineer

Chris Williams - District I Supervisor Larry Johnson - Environmental Engineer Alan Hodge - Phoenix

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IMPORTANT NOTICE:

Phoenix Environmental, LLC, with offices at 2113 French Drive, Hobbs, New Mexico 88241 (the Company), has prepared this project report for remediation of the, Wells B-1 Fed Well #4-1 to the best of its ability. No warranty, expressed or implied, is made or intended. The report was prepared for Prime Operating Company, with offices at 3300 "A" Bldg. 1-238, Midland, Texas 79705, (the Client). All information disclosed in this plan is for internal purposes only and is considered confidential. By accepting this document, the recipient agrees to keep confidential the information contained herein. The recipient further agrees not to copy, reproduce or distribute to any third party this project plan in whole or in part, without express written permission from the Company or Client.





SECTION I

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Project Overview

Phoenix Environmental, LLC. (Phoenix) was contracted by Mr. Donny Thompson with Prime Operating to consult and oversee the clean up and closure of a flow line leak/spill from the Wells B-1 Fed Well #4-I. The Wells B-1 Fed #4-I is located in Sec.1, T25S, R36E of Lea Co. New Mexico with a GPS Reading of 32°09'26.8"N & 103°12'44.8"W with an elevation of 3197' above sea level and belongs to Prime Operating, Inc. The land, in and around the site, is primarily used as pasture for cattle and the production of oil and gas. The leak/spill site is located in the pasture on the west side of the location.

The potential contaminates of concern were medium to high level concentrations of hydrocarbons and produced water that were lost from a small hole or leak in the flow line and absorbed by the surrounding near surface soils.

The ground water depth data that was available for this section from the State of New Mexico Engineers' office showed that the vertical depth to the top of water was in the 60-70 foot range below ground surface.

Pursuant to the NMOCD guidelines for clean up of leaks and spills, the clean up level for this site will be at <100 ppm for TPH (Total Petroleum Hydrocarbons) and <50 ppm for BTEX (Benzene, Toluene, Ethylbenzene, and Xylene). The NMOCD has also asked for CL (Chlorides) be returned back to <250 ppm.

Findings and Conclusion

There was 852 cubic yards of contaminated soils that were excavated from the spill site area. These impacted soils were transported off site and disposed of at an approved NMOCD permitted commercial disposal facility. (Please refer to the attached Certificate of Waste Status of this report).

The bottom of the excavation (approximately 4 feet) was tested for TPH, BTEX & Chlorides to make certain that the target limits had been met prior to backfilling and compaction for closure. The site cleaned up very well with vertical depth of impact, only going 4 feet in depth and not impacting groundwater. All of the final lab analyses were below the NMOCD guidelines for leaks and spills (refer to attached laboratory reports for actual levels).



Due to the fact-that approval from the NMOCD and the landowner has not been granted for backfilling, the site has yet to be backfilled and compacted with clean backfill and contoured with a crown to prevent ponding on the area. Once this approval is granted the site will be backfilled and reseeded to revegetate the site.

Chronology of Operations

11. 1334

On or about April 1, 2005 there was a hole that came in the flow line for the Wells B-1 Fed Well #4-I with an unknown amount of fluids lost and absorbed by the near surface soils.

- 1. On 4-4-05: Phoenix met Mr. Donny Thompson on site to get paper work done for off site disposal. There was a backhoe on site to excavate the impacted soils from the spill. These impacted soils were loaded and transported off site for disposal at the Doom Land farm, a NMOCD licensed facility. There was 24cyds taken out on this date.
- 2. On 4-5-05: Prime is excavating impacted soils with a backhoe and loading trucks for off site disposal. On this date there was 24cyds of impacted soils that were transported off site for disposal.
- 3. On 4-6-05: Prime is excavating impacted soils with a backhoe and loading trucks for off site disposal. On this date there was 264cyds of impacted soils that were transported off site for disposal.
- 4. On 4-7-05: Prime is excavating impacted soils with a backhoe and loading trucks for off site disposal. On this date there was 144cyds of impacted soils that were transported off site for disposal. Phoenix was on site this date and noted that there was some hydrocarbon stains that were in the walls and that some additional excavation was needed to complete the removal of impacted soils.
- 5. On 4-8-05: Prime is excavating impacted soils with a backhoe and loading trucks for off site disposal. On this date there was 396cyds of impacted soils that were transported off site for disposal.



There was a total of 852cyds of impacted soils that were taken off site for disposal. Once all of the impacted soils had been removed, final bottom samples were taken and sent to a third party lab for analysis. These samples were tested for TPH, BTEX and CL.

A review of the lab analysis showed that the site was well below the standards of the NMOCD for site closure. (See lab analysis for actual levels)

At this point the site should pose very little if any future environmental threat and needs to be backfilled pending approval from the NMOCD and the Landowner.

Certification

The following Phoenix Environmental personnel have reviewed this report and verified that to the best of their knowledge the contents are true and correct.

Allen Hodge, REM **Senior Project Manager** Phoenix Environmental, LLC.

Signature:

Registered Environmental Manager #7096 National Registry of Environmental Professionals

approved: Part flanky 10-13-05



SECTION II

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ANA	LYTICAL								
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therwise noted, all samples were received in acceptable condition and all sampling was performed by client or client representative. Sample result of ND indicates Not is result is less than the sample specific Detection Limit. Sample specific Detection Limit is determined by multiplying the sample Dilution Factor by the listed Reporting Limit. All results relate only to the items tested. Any miscellaneous workorder information or foonotes will appear below.

Fresults are not corrected for method blank or field blank contamination.

Sample was received at 16.3 degrees Celsius.

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SECTION III







SECTION IV



Photo #1 Looking Southwest



Photo #2 Looking Northwest



Photo #3 Looking Northeast



Photo #4 Looking Southeast



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PHOENIX ENVIRO

District I State	of New Mexico	
District II Energy Miner	als and Natural Resources	Form C-141 Revised March 17, 1999
District III	servation Division	· · ·
	buth St. Francis Dr.	Submit 2 Copies to appropriate District Office in accordance
1720 S. St. Francis Dr. Sonto Ed. NM 87505	• •	with Rule 116 on back side of form
	a Fe, NM 87505	
Kelease Notificat	ion and Corrective A	Action
Name of Company PRIME ODERATING CO.	OPERATOR	Initial Report K. Final Report
Address 3300 "A" (724 1-238 Midaw, 1x 79705	Contact DCN/N, E Telephone No.M 432	
Facility Name WELLS B-1 FZC WELL #4-1	Facility Type	
Surface Owner CLAY OSBODN Mineral Own		
Surface Contact CLAT COSDOLLO Millieral CWI	er F20	Lease No.11
	ION OF RELEASE	AP1#30025255320000
	orth/South Line Feet from the	East/West Line County
255 368		LEA
		I
Type of Release FLOW Live Logk	RE OF RELEASE	A. 137-1
Source of Release Ling Lank	Date and Hour of Occurrent	
Was immediate Notice Given?	If YES. To Whom?	
🗆 Yes 🙇 No 🗋 Not Requi	red	
By Whom? ()	Date and Houri	
Was a Watercourse Reached?	If YES, Volume Impacting	the Watercourse.
Yes X No		
If a Watercourse was Impacted, Describe Fully.*		
NO		
Describe Cause of Problem and Remedial Action Taken.*		
LEAK IN FLOW LINE Soils	TAKEN OFF	JITE FOR DISPOSAL
LEAR IN FLOW LINE Soils 8520405 OF FUPPORTEd Soils		
a Denne I Aug England		
Describe Area Affected and Cleanup Action Taken.* Leak was In Passwer, ALL &	"ADACTEd SOILS	WERE REMOVED
LAR WAS IN MASION , AUC +		
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I hereby certify that the information given above is true and complete	to the best of my knowledge and u	inderstand that pursuant to NMOCD rules and
regulations all operators are required to report and/or file certain relea public health or the environment. The acceptance of a C-141 report b	se noull callons and perform correctly the NMOCD marked as "Final P	cive actions for celeases which may endenger
should their operations have failed to adequately investigate and reme	diate contamination that pose a thr	eat to ground water, surface water, human health
or the environment. In addition, NMOCD acceptance of a C-141 repo	rt does not relieve the operator of	responsibility for compliance with any other
federal, state, or local laws and/or regulations.	·····	
	OIL CON	SERVATION DIVISION
Signature: Canlos Lile		
Printed Name: CANDY Life	Approved by District Supervi	isor:
THE: Eng. Asst. / Production Analyst	Approval Date:	Expiration Date:
		Attached
Date: 11/22/05 Phone: 423-682-57	Conditions of Approval:	

" Attach Additional Sheets If Necessary