

## CAT 3 Compressor Station

## WORK PLAN

Release Date: December 1, 2016

Unit Letter N, Section 2, Township 23 South, Range 34 East

API No. (closest well) 30-025-27486

NMOCD Case #: Not Assigned

### December 13, 2016

Prepared by: Michael Burton, Environmental Operations Director Environmental Department Diversified Field Service, Inc. 206 W. Snyder Hobbs, NM 88240 Phone: (575)964-8394 Fax: (575)393-8396

## Table of Contents

- 1 Introduction
- 2 Site Activities
- 3 Conclusion

FIGURE

1 – Site Map

APPENDICES

Appendix I – Initial C-141

- Appendix II Site Photos
- Appendix III Laboratory Analysis
- Appendix IV Groundwater Study

Kristen Lynch Environmental Protection Specialist New Mexico Oil Conservation District 1625 N French Drive Hobbs, NM 88240

#### RE: BTA Oil Producers, LLC – CAT 3 Compressor Station – Remediation Work Plan UL/N, Section 2, T23S, R34E API No. (closest well) 30-025-27486 NMOCD Score: 0

Ms. Lynch,

BTA Oil Producers, LLC (BTA) has retained Diversified Environmental (DFSI) to address environmental issues for the site detailed herein.

The site is located southwest of Eunice, NM, in Lea County. The spill site resulted from a hole in the tank for the scrubber and compressor dumps. A total of approximately 60 barrels of condensate was released with 15 barrels recovered. An initial C-141 was submitted to NMOCD on December 2, 2016 and (Appendix I).

#### Site Assessment

On December 5, 2016 DFSI personnel were on site to obtain a sample within the leak area (Appendix II). One samples was obtained and field sampled for chloride levels, as well as BTEX (Figure 1). The BTEX samples were performed using a Mini Rae Photoionization Detector (PID). The soil samples, a 4 ft and a 68 ft sample, were submitted for laboratory analysis at Cardinal Laboratories of Hobbs, NM (Appendix III).

DFSI has conducted a groundwater study of the area and has determined, according to the New Mexico Office of the State Engineer, there is no known groundwater beneath this site (Appendix IV).

#### Conclusion

After careful review DFSI, on behalf of BTA, would like to propose the following:

The tank will be removed entirely and excavated to a depth of 4' bgs. Prior to any additional remediation and installation work, a confirmatory 4' sample of sidewalls will be submitted to an approved facility for analysis. A new pad, with an installed liner at the base, will be built. In order to provide a secondary barrier in case of future releases, berms will be installed and lined.

Following the approval of the above plan, DFSI will submit all proper closure documentation to the NMOCD and BLM in accordance to the State and Federal Guidelines set forth.

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

Sincerely,

Michael Burton J

Michael Burton Environmental Operations Director | Diversified Field Service, Inc. 206 West Snyder | Hobbs, NM 88240 Office: (575)964-8394 | Mobile: (575)390-5454 Fax: (575)964-8396 | Email: Mburton@diversifiedfsi.com

Cc: Shelly Tucker, BLM

Figures: Site Diagram

Appendices: Initial C-141 Site Photos Laboratory Analysis Groundwater Study

### Site Map



# Appendix I

INITIAL C-141

#### State of New Mexico Energy Minerals and Natural Resources

Form C-141 Revised March 17, 1999

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

		Release	Notifi	catio	on and Co	orrective A	ction	1			
					<b>OPERA</b>	ΓOR		🛛 Initi	al Report		Final Report
Name of Company	/ BTA Oil Pro	ducers LLC			Contact	Pam Insk					
					Telephone 1						
Facility NameCAT 3 compressor station 32.3281351						e compress	sor stati	on			
Surface Owner S	State of NM	1	Mineral (	Owner				Lease M	No.		
			LOC	ATIC	ON OF RE	LEASE					
Unit Letter Section 2	on Township 23S	Range Feet f 34E	from the	Nort	th/South Line	Feet from the	East/V	West Line	County Lea		
			NAT	<b>FUR</b>	E OF REL						
Type of Release	Minor					Release 60 BW			Recovered	15	
Source of Release	hole in tan	ık			8 pm 12/0		ce		Hour of Di 2/01/2016	scovery	/
Was Immediate Not	ice Given?	es 🗌 No 🗌	Not Requ	uired	If YES, To Kristen Ly	Whom? nch – NMOCD					
By Whom?	Pam Inske	еер			Date and H	Iour 11:15 am	12/02	/2016			
Was a Watercourse	Reached?	Yes 🛛 No			If YES, V	olume Impacting	the Wat	ercourse.			
If a Watercourse wa N/A Describe Cause of P The release is at a co the SW/SE of Sec 2 The tank for the scru released onto the loo be recovered and tal will also be complet #1 location, until a r the new CAT #3 tan Describe Area Affect See above ex I hereby certify that regulations all opera	roblem and Remea ompressor site asso , T23S-R34E, Lea abber dump and co cation. All was con cen to one of our d ed by Diversified. new tank can be set k. cted and Cleanup A cplanation the information gi	dial Action Taken becated with our 8 Co. near our Stat ompressor dump : intained inside the isposals. The co The damaged ta t in the week of 1 Action Taken.*	8006 Ante te 2 #1 loc for the CA e earthen I ntaminate nk will be 2/05/16.	cation ( AT #3 c berm and d soil to e replace At that plete to release	(30-025-27486) developed a hol round the comp will be removed ced. We will la t time, any fluid	The release was e and an estimate ressor. The reco l by Diversified a y a line from the that is stored ter knowledge and nd perform corre	d 60 bbl verable nd taker compres nporaril	ered late or fluid (an es n to an appr ssor/dump y in that en nd that pur tions for re	n 12/1/16. nsate and w timated 15 roved waste to an empty npty tank w suant to NM leases whicl	ater mi bbls, at dispos tank at ill be m 40CD h may c	x was present) will al. Clean up t the State 2 hoved back to rules and endanger
public health or the should their operation or the environment. federal, state, or loc	environment. The ons have failed to a In addition, NMC	acceptance of a adequately invest OCD acceptance of	C-141 rep	ort by remed	the NMOCD n iate contaminat	harked as "Final F ion that pose a th	Report" ( reat to g respons	does not re round wate libility for o	lieve the oper, surface we compliance	erator c vater, hu with an	uman health
Signature: 4000 Printed Name:	Pam Inskeep	μ			Approved by	District Superv	visor:				
Title:	Regulatory Ad	ministrator			Approval Da	ite:		Expiration	Date:		
	6 Phone: (432)				Conditions of	f Approval:			Attache	d 🗌	

\* Attach Additional Sheets If Necessary

# Appendix II

SITE PHOTOS

## CAT 3 COMPRESSOR STATION

### PHOTO PAGE



Site prior

# Appendix III

LABORATORY ANALYSIS



December 12, 2016

CLAY TIPTON

**BTA Oil Producers** 

103 South Pecos

Midland, TX 79701

RE: CAT COMPRESSOR

Enclosed are the results of analyses for samples received by the laboratory on 12/08/16 9:45.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-16-8. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at <a href="https://www.tceq.texas.gov/field/ga/lab\_accred\_certif.html">www.tceq.texas.gov/field/ga/lab\_accred\_certif.html</a>.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keine

Celey D. Keene Lab Director/Quality Manager



#### Analytical Results For:

BTA Oil Producers CLAY TIPTON 103 South Pecos Midland TX, 79701 Fax To: (432) 683-0312

Received:	12/08/2016	Sampling Date:	12/06/2016
Reported:	12/12/2016	Sampling Type:	Soil
Project Name:	CAT COMPRESSOR	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

#### Sample ID: SP 1 @ 4' (H602744-01)

BTEX 8021B	mg/	kg	Analyze	d By: MS					S-04
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	0.122	0.050	12/08/2016	ND	2.25	113	2.00	0.150	
Toluene*	6.07	0.050	12/08/2016	ND	2.32	116	2.00	0.135	
Ethylbenzene*	6.46	0.050	12/08/2016	ND	2.25	112	2.00	0.158	
Total Xylenes*	56.8	0.150	12/08/2016	ND	6.81	114	6.00	0.229	
Total BTEX	69.4	0.300	12/08/2016	ND					
Surrogate: 4-Bromofluorobenzene (PID	263 9	6 73.6-14	0						
Chloride, SM4500Cl-B	mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	112	16.0	12/08/2016	ND	416	104	400	0.00	
TPH 8015M	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	467	10.0	12/09/2016	ND	190	95.0	200	1.17	
DRO >C10-C28	754	10.0	12/09/2016	ND	204	102	200	0.506	
Surrogate: 1-Chlorooctane	96.4	% 35-147	7						
Surrogate: 1-Chlorooctadecane	67.5	% 28-171							

#### **Cardinal Laboratories**

#### \*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any daim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatscever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including whose shall be instrumed by client, its subsidiaries, affiliates or successor arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



#### Analytical Results For:

BTA Oil Producers CLAY TIPTON 103 South Pecos Midland TX, 79701 Fax To: (432) 683-0312

Received:	12/08/2016	Sampling Date:	12/07/2016
Reported:	12/12/2016	Sampling Type:	Soil
Project Name:	CAT COMPRESSOR	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

#### Sample ID: SP 1 @ 68' (H602744-02)

BTEX 8021B	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	12/08/2016	ND	2.25	113	2.00	0.150	
Toluene*	<0.050	0.050	12/08/2016	ND	2.32	116	2.00	0.135	
Ethylbenzene*	0.120	0.050	12/08/2016	ND	2.25	112	2.00	0.158	
Total Xylenes*	0.840	0.150	12/08/2016	ND	6.81	114	6.00	0.229	
Total BTEX	0.960	0.300	12/08/2016	ND					
Surrogate: 4-Bromofluorobenzene (PID	130 9	73.6-14	0						
Chloride, SM4500Cl-B mg/kg		Analyzed By: AC							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	128	16.0	12/08/2016	ND	416	104	400	0.00	
TPH 8015M	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	12/09/2016	ND	190	95.0	200	1.17	
DRO >C10-C28	34.9	10.0	12/09/2016	ND	204	102	200	0.506	
Surrogate: 1-Chlorooctane		% 35-147	,						
Surrogate: 1-Chlorooctadecane	72.8	% 28-171							

#### **Cardinal Laboratories**

#### \*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any daim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatscever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including whose shall be instrumed by client, its subsidiaries, affiliates or successor arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



#### **Notes and Definitions**

S-04	The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500CI-B does not require samples be received at or below 6°C
	Samples reported on an as received basis (wet) unless otherwise noted on report

#### **Cardinal Laboratories**

#### \*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any daim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatscever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including whose shall be instrumed by client, its subsidiaries, affiliates or successor arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keine

Celey D. Keene, Lab Director/Quality Manager



### CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

(575) 393-2326 FAX (575) 393-2 Company Name: BTH		BILL TO	ANALYSIS REQUEST
Project Manager:		P.O. #:	
Address:		Company:	
City: State:	Zip:	Attn:	
hone #: Fax #:		Address:	
Project #: Project Ov	vner:	City:	_
Project Name: BTA		State: Zip:	
Project Location: CAT COMPLES	çar	Phone #:	
Sampler Name: Recky Alar	2	Fax #:	
FOR LAB USE ONLY	a. MATRIX	PRESERV	
Lab I.D. Sample I.D. $H_{002744}$ 2 Sp (@ 4') 2 Sp   @ 68'	CONTAINERS  CONTAINERS	Studge Studge OTHER: Actibibase: Actibibas	

Relinguished By: Relinguished By: Relinguished By: Relinguished By:	Date: Received By:   Date: Received By:   Time: Time:
Delivered By: (Circle One) Sampler - UPS - Bus - Other:	-0.4° C Sample Condition CHECKED BY: Cool Intact (Infitials) m Patterson No No

x

† Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326

14

2.

# Appendix IV

**GROUNDWATER STUDY** 



## New Mexico Office of the State Engineer Water Column/Average Depth to Water

No records found.

PLSS Search:

Section(s): 34, 35, 36

Township: 22S

Range: 34E

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.



## New Mexico Office of the State Engineer Water Column/Average Depth to Water

No records found.

PLSS Search:

Section(s): 1, 2, 3, 10, 11, Township: 23S F 12

Range: 34E

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.