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

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

Form C-141
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

OPERATOR

X Initial Report Final Report

Name of Company: Lucid Energy Delaware	Contact Kerry Egan
Address 201 South Fourth Street Artesia, NM 88210	Telephone No. 575 513-8988
Facility Name: Rojo Toro	Facility Type: Pipeline ROW

Surface Owner: Private (B. Madera)	Mineral Owner Fee	API No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the:	North/South Line	Feet from the:	East/West Line	County
O	15	24S	34E	1200	South Line	1500	East Line	Lea

Latitude 32.2136030° **Longitude** -103.454173°

NATURE OF RELEASE

Type of Release: Fresh Water	Volume of Release: 8,000 bbls	Volume Recovered: None
Source of Release: Pipeline rupture during hydrotest.	Date and Hour of Occurrence: 3/23/2018; 0200 – 0300 hrs	Date and Hour of Discovery: 3/23/2018; 0200 – 0300 hrs
Was Immediate Notice Given? ☒ Yes ☐ No ☒ Not Required	If YES, To Whom? Phone call with Jim Griswold on afternoon of 3/23/2018. Left a voicemail for Olivia Yu (District 1) on 3/23/2018.	
By Whom? Kerry Egan	Date and Hour 3/23/18; 4:00 – 5:00PM	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.	

RECEIVED
By Olivia Yu at 1:04 pm, Mar 28, 2018

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*
During a hydrostatic test of a gas line (still under construction, having never transported hydrocarbons), the pipeline failed, releasing approximately 8,000 bbls of fresh water. The water flowed along the pipeline ROW, and made it outside of the ROW into the pasture. The line was isolated as soon as possible to prevent any further release.

Describe Area Affected and Cleanup Action Taken.*
The location of the line rupture was in a low spot relative to the surrounding topography. The total area wetted by the fresh water was approximately 200-300 yds by 50-75 yds. Upon investigation, there were no observable indications of hydrocarbon or chloride contamination. Soil samples from the release point and within the "affected area" were collected to confirm there was no contamination related to the release of the fresh water.

Sample results will be submitted with a closure request and final C-141.

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

Signature: Kerry Egan	OIL CONSERVATION DIVISION
Printed Name: Kerry Egan	Approved by Environmental Specialist: dy
Title: Environmental Compliance Coordinator	Approval Date: 3/28/2018 Expiration Date:
E-mail Address: KEgan@lucid-energy.com	Conditions of Approval: see attached directive Attached ☑
Date: 3/27/2018 Phone: 575 810-6021	

* Attach Additional Sheets If Necessary

1RP-5002 nOY1808747895

fOY1808747316 pOY1808748392

Operator/Responsible Party,

The OCD has received the form C-141 you provided on _3/27/2018_ regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number _1RP-5002__ 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 division-approved corrective action 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 _1_ office in __Hobbs____ on or before _4/28/2018_. 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; C_6 thru C_{36}), 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; C_6 thru C_{36}), 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
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Santa Fe, New Mexico 87505
505-476-3465
jim.griswold@state.nm.us