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 April 3, 2017

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 McElvain Energy Inc.	Contact; Tony Cooper
Address 1050 17th Street Ste. 2500, Denver Colorado, 80265	Telephone No. 303-501-0004
Facility Name EK 30 BS2 Federal Com 1H	Facility Type Oil and Gas Production

Surface Owner: DOI/BLM	Mineral Owner: Same	API No. 30-025-42701

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
P	30	18S	34E	175	SOUTH	860	EAST	LEA

Latitude 32.71194167 **Longitude** -103.59384444 NAD83

NATURE OF RELEASE

Type of Release CRUDE OIL	Volume of Release: 25 bbls	Volume Recovered 5-10 bbls
Source of Release Vapor Recovery Unit / PRV	Date and Hour of Occurrence 4/12/2018… 5:15am	Date and Hour of Discovery 4/12/2018… 6:50 am
Was Immediate Notice Given? x☐ Yes ☐ No ☐ Not Required	If YES, To Whom? Ms. Tucker/BLM/CFO, Ms. Lu, NMOCD Hobbs, Wayne Smith BLM/Lessee	
By Whom? Tony Cooper (BLM, OCD) Brian Odell (Mr. Smith)	Date and Hour 4/20/2018…. 9:00am-11:00am	
Was a Watercourse Reached? ☐ Yes x☐ No	If YES, Volume Impacting the Watercourse. NA	

RECEIVED
By Olivia Yu at 2:59 pm, Apr 13, 2018

If a Watercourse was Impacted, Describe Fully.*
NA

Describe Cause of Problem and Remedial Action Taken.*
A third party crude oil hauler shut a production valve on one of the crude oil storage tanks before manually gauging it. The valve was never reopened after the gauging activity was completed. Crude oil flooded the vapor recovery tower (VRT) sending oil to the vapor recovery unit (VRU). The exact source of the release was the 125# relief valve on the VRU fluid scrubber. Since the oil was released into the air the release coated the production equipment within the lined containment area as well as a small section of Federal land on the west side of the pad.

All free standing oil has been vacuumed up and properly disposed of at a SWD. Over the next several days the production equipment and storage tanks within the containment will be pressure washed and the fluids will be captured by vac truck and taken to a SWD. This facility is < 1 year old and the containment area is lined with a 20 mil poly liner. The liner is like new so no soil beneath the liner was impacted from this release.

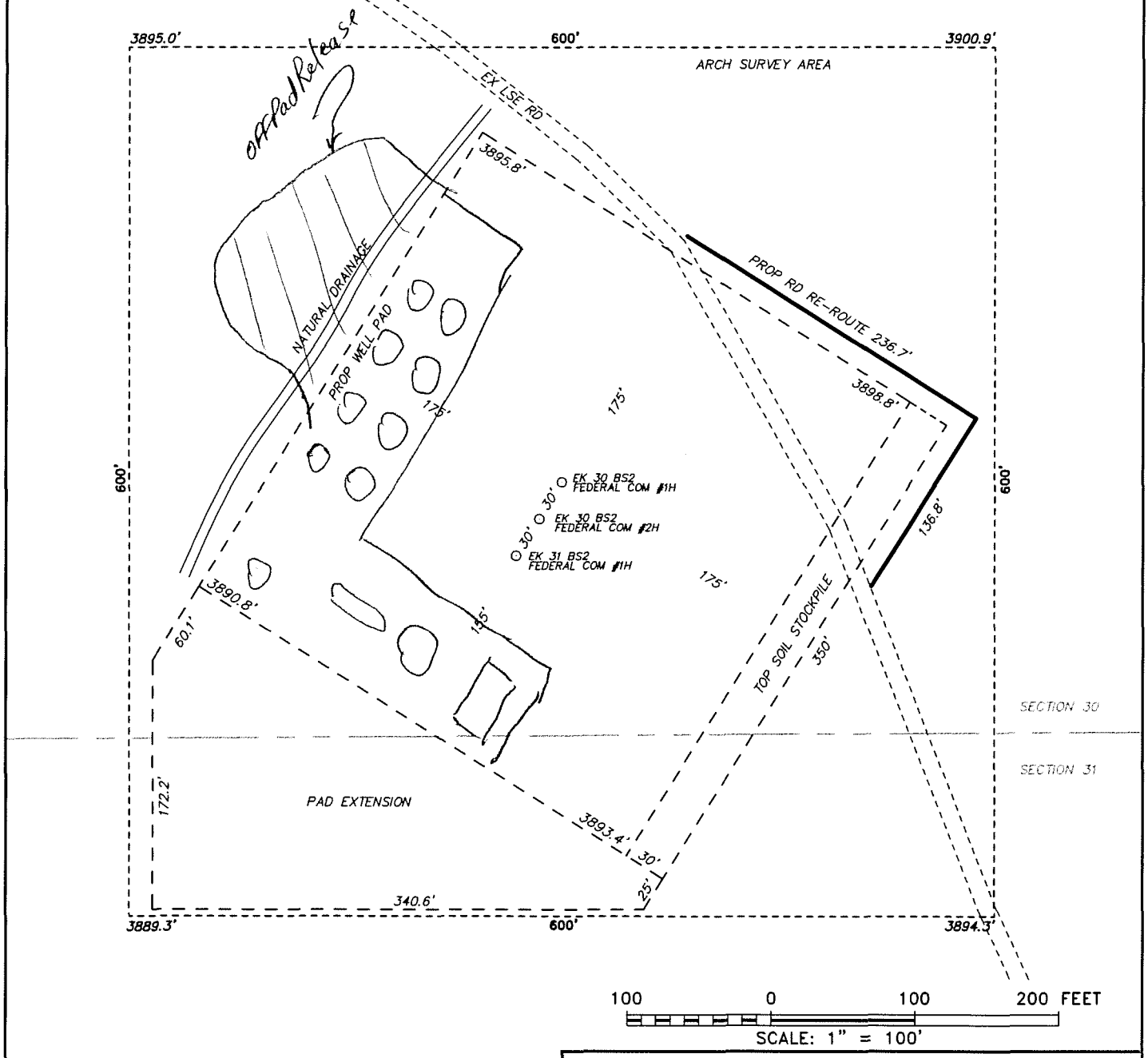
Describe Area Affected and Cleanup Action Taken.* The native vegetation on the west side of the pad boundary was misted with oil. The natural drainage ditch in that area had some areas of standing oil. That ditch was flushed with fresh water to remove as much residual crude oil as possible. The flush water was recovered by vac truck and taken to SWD. As per Ms. Tucker with the BLM/CFO, the vegetation that has been sprayed with oil will be mowed with a brush hog attachment. The entire affected area will then be sprayed with some type of microbial product such as Micro Blaze to accelerate the hydrocarbon degradation process. A third party environmental remediation company will be retained to perform the confirmation soil sampling after adequate time has passed allowing for the degradation of the soil in the affected area. When lab results for the soil are below NMOCD levels a C-141 along with a copy of the lab results of the confirmation soil sampling will be submitted to the NMOCD for approval and final closure of the release.

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: Tony Cooper	OIL CONSERVATION DIVISION
Printed Name: Tony Cooper	Approved by Environmental Specialist:
Title: Regulatory Mgr	Approval Date: 4/13/2018 Expiration Date:
E-mail Address: tonyc@mcelvain.com	Conditions of Approval: see attached directive Attached ☐
Date: 4-12-18 Phone: 3035010004	

1RP-5019 nOY1810354180 pOY1810355975

SECTION 30, TOWNSHIP 18 SOUTH, RANGE 34 EAST, N.M.P.M.,
LEA COUNTY, NEW MEXICO.



100 0 100 200 FEET

SCALE: 1" = 100'

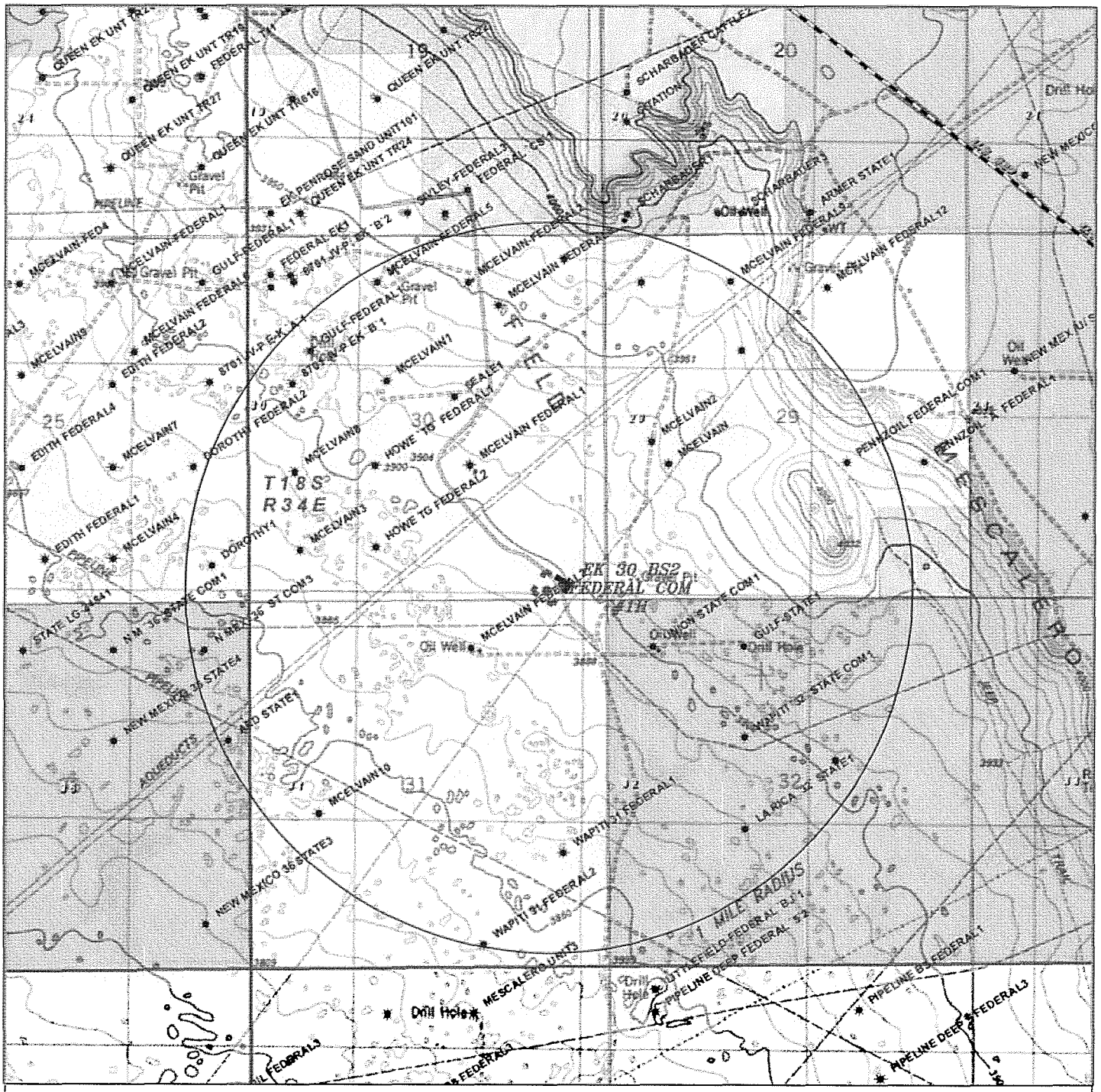
McELVAIN ENERGY, INC

REF: EK 30 BS2 FEDERAL COM 1H / WELL PAD TOPO

THE EK 30 BS2 FEDERAL COM 1H LOCATED 175' FROM THE SOUTH LINE AND 860' FROM THE EAST LINE OF SECTION 30, TOWNSHIP 18 SOUTH, RANGE 34 EAST. N.M.P.M., LEA COUNTY, NEW MEXICO.

basin surveys
focused on excellence in the oilfield
P.O. Box 1786 (575) 393-7316 - Office
1120 N. West County Rd. (575) 392-2206 - Fax
Hobbs, New Mexico 88241 basinsurveys.com

W.O. Number: 32344	Drawn By: J GOAD	Date: 6-15-2016	Survey Date: 6-10-2016	Sheet 1 of 1 Sheets



EK 30 BS2 FEDERAL COM 1H

Located 175' FSL and 860' FEL

Section 30, Township 18 South, Range 34 East,

N.M.P.M., Lea County, New Mexico.

basin surveys
focused on excellence in the oilfield

P.O. Box 1786
1120 N. West County Rd.
Hobbs, New Mexico 88241
(575) 393-7316 - Office
(575) 392-2206 - Fax
basinsurveys.com

0' 1000' 2000' 3000' 4000'

SCALE: 1" = 2000'

W.O. Number: JG 32344

Survey Date: 6-10-2016

YELLOW TINT - USA LAND
BLUE TINT - STATE LAND
NATURAL COLOR - FEE LAND

N

McELVAIN ENERGY, INC

Operator/Responsible Party,

The OCD has received the form C-141 you provided on _4/12/2018_ regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number _1RP-_5019_ 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 _5/13/2018_. 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
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
505-476-3465
jim.griswold@state.nm.us