

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

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	NOY1827027015
District RP	1RP-5207
Facility ID	fOY1827026587
Application ID	pOY1827026700

Release Notification

Responsible Party

Responsible Party: ETC Texas Pipeline, Ltd.	OGRID: 371183
Contact Name: Carolyn J. Blackaller	Contact Telephone: (817) 302-9766
Contact email: carolyn.blackaller@energytransfer.com	Incident # (assigned by OCD) NOY1827027015
Contact mailing address: 600 N. Marienfeld Street, Suite 700, Midland, TX 79701	

Location of Release Source

Latitude 32.064557 Longitude -103.717733
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Cal C Pipeline	Site Type: Pipeline
Date Release Discovered: 9/7/2018	API# (if applicable): N/A

Unit Letter	Section	Township	Range	County
C	7	T26S	R32E	Lea

Federal minerals

Surface Owner: ☐ State ☒ Federal ☐ Tribal ☒ Private (Name: BLM)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

☐ Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
☐ Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	☐ Yes ☐ No
☐ Condensate	Volume Released (bbls)	Volume Recovered (bbls)
☒ Natural Gas	Volume Released (Mcf) 2582 Mcf	Volume Recovered (Mcf): 0 Mcf
☐ Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release: On September 7, 2018, it was discovered that internal corrosion to a segment on the Cal C Pipeline in Lea County, NM required repair. A crew was dispatched to make these repairs, however, before repairs could be made, the entirety of the pipeline needed to be blown down in order to isolate the segment. Given the length of the line, approximately 15 miles, it took approximately 25.5 hours for the blowdown to complete. Using the pipe diameter, wall thickness, pipe pressure, and length, an approximate loss of 2,582 Mcf was calculated. Please find these calculations appended to this form. The gas released from the blowdown went entirely to atmosphere and 0 Mcf was recovered. Once repairs were finished, the line was put back into service.

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Was this a major release as defined by 19.15.29.7(A) NMAC? ☒ Yes ☐ No	If YES, for what reason(s) does the responsible party consider this a major release? Approximately 2,582 Mcf was released to atmosphere. NMAC 19.15.29.7 classifies a release of gas greater than 500 Mcf to be a major release.
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? Notice was given via email by Carolyn J. Blackaller, Sr. Environmental Specialist, on 9/10/2018 at 13:34, to Olivia Yu, Environmental Specialist, NMOCD District I, Christina Hernandez, Environmental Specialist, NMOCD District I, and Jim Griswold, Environmental Bureau Chief.	

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

☒ The source of the release has been stopped. ☒ The impacted area has been secured to protect human health and the environment. ☐ Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. N/A ☐ All free liquids and recoverable materials have been removed and managed appropriately. N/A
If all the actions described above have <u>not</u> been undertaken, explain why:
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.
Printed Name: <u>Carolyn J. Blackaller</u> Title: <u>Sr. Environmental Specialist</u> Signature: <u></u> Date: <u>9/21/2018</u> email: <u>carolyn.blackaller@energytransfer.com</u> Telephone: <u>(817) 302-9766</u>
OCD Only Received by: RECEIVED <u>By Olivia Yu at 7:18 am, Sep 27, 2018</u> Date: _____

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Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?

_____ (ft bgs)

Did this release impact groundwater or surface water?

☐ Yes ☐ No

Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?

☐ Yes ☐ No

Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?

☐ Yes ☐ No

Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?

☐ Yes ☐ No

Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?

☐ Yes ☐ No

Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?

☐ Yes ☐ No

Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?

☐ Yes ☐ No

Are the lateral extents of the release within 300 feet of a wetland?

☐ Yes ☐ No

Are the lateral extents of the release overlying a subsurface mine?

☐ Yes ☐ No

Are the lateral extents of the release overlying an unstable area such as karst geology?

☐ Yes ☐ No

Are the lateral extents of the release within a 100-year floodplain?

☐ Yes ☐ No

Did the release impact areas **not** on an exploration, development, production, or storage site?

☐ Yes ☐ No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

Characterization Report Checklist: *Each of the following items must be included in the report.*

- ☐ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☐ Field data
- ☐ Data table of soil contaminant concentration data
- ☐ Depth to water determination
- ☐ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- ☐ Boring or excavation logs
- ☐ Photographs including date and GIS information
- ☐ Topographic/Aerial maps
- ☐ Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

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Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

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Remediation Plan

Remediation Plan Checklist: *Each of the following items must be included in the plan.*

- ☐ Detailed description of proposed remediation technique
- ☐ Scaled sitemap with GPS coordinates showing delineation points
- ☐ Estimated volume of material to be remediated
- ☐ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☐ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- ☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- ☐ Extents of contamination must be fully delineated.
- ☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: _____ Date: _____

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Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

Closure Report Attachment Checklist: *Each of the following items must be included in the closure report.*

- ☐ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☐ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☐ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☐ Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: _____ Date: _____

Printed Name: _____ Title: _____

Blowdown Volume Calculation

INPUT

Facility Name	=	Cal C Pipeline	
Date	=	9/7/2018	
Gas Behind Pig	=	0	Mcf
Pipe OD	=	16.000	Inches
Pipe WT	=	0.25	Inches
Pipe Pressure	=	330	Psig
Pipe Length	=	15.02	Miles

Used only for Pig Run Time
0.376

EQUATIONS

Blowdown Volume	=	$\frac{(1.96) * (Psig + 14.45) * (Pipe\ ID^2) * (miles) * (1000)}{(Z * 10^6)}$
Gas Velocity	=	$\frac{(.75) * (Mcf) * (1000) * (60) * Z}{((Pipe\ ID^2) * (Psig + 14.45) * (24))}$
Water to Fill	=	$\frac{(miles) * (5280) * (PI) * (ID^2) * 7.484}{(4) * (144) * (42)}$

CALCULATED

Pipe ID		15.500	
Z Factor		0.944	
Blowdown Volume	=	2,582	Mcf
Gas Velocity	=	0	Ft/min
Pig Speed	=	0.0	Mph
Run Time	=	#DIV/0!	Hrs
Water to Fill	=	18,518	Bbls