From: Fejervary Morena, Gustavo A
To: Yu, Olivia, EMNRD; Davis, Brandon
Subject: [EXT] RE: [EXTERNAL]RE: Wilder Federal 28-1
Date: Thursday, November 8, 2018 7:56:23 AM

Hi Olivia,

Following up our phone conversation, we will assume 10% effective porosity to estimate spills that occurred on new pads (<5 years).

For this particular spill, please note the corrected spill volume estimation is 20.27 bbls

130ft * 35ft * (3/12ft)* 0.1/5.61ft3= 20.27 bbls

Thanks for all your guidance and clarification.

Gustavo Fejervary
ConocoPhillips, GPBU Environmental Coordinator
3300 N A St. Midland Texas 79705
O: 432-688-9087, C: 432-210-7037, E: g.fejervary@cop.com

From: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Sent: Friday, October 19, 2018 2:11 PM
To: Davis, Brandon <Brandon.Davis@conocophillips.com>; stucker@blm.gov
Cc: Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>; Fejervary Morena, Gustavo A <G.Fejervary@conocophillips.com>; Kniffen, David K <David.K.Kniffen@conocophillips.com>
Subject: RE: [EXTERNAL]RE: Wilder Federal 28-1

Mr. Davis: Thank you for explaining the discrepancy and drone photo.

Mr. Fejervary: NMOCD could understand setting the soil porosity generically at 25%. The concern is why and how soil absorption factors into calculating a release volume and why it is set at 0.25. The constant may be justified if the spill calculator factors in whether the release was an oil or produced water spill, so that oil viscosity, specific gravity of oil, infiltration rate, etc. can be taken into account. However, the screenshot provided does not have this apparent information.

Thanks,
Olivia

From: Davis, Brandon <Brandon.Davis@conocophillips.com>
Sent: Friday, October 19, 2018 11:56 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; stucker@blm.gov
Cc: Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>; Fejervary Morena, Gustavo A <G.Fejervary@conocophillips.com>; Kniffen, David K <David.K.Kniffen@conocophillips.com>
Subject: [EXT] RE: [EXTERNAL]RE: Wilder Federal 28-1

The initial estimate of 81 bbls was based on a straight volume calculation that was not caught until I was attaching the calculations to the C-141. After it was discovered it was ran through the spill calculator that produced the estimate that was provided on the C-141.

I forwarded your request for a rationale on the soil settings and below is the response from our Environmental group. I copied one of our environmental representatives (Gustavo Fejervary) on this email and he can assist you with any technical questions.

The 25% Rule of Thumb was developed based upon averaging out soil porosities and interstitial available "space" (includes air, water and available void space).

The aerial photo does have the date and geo-reference listed in the properties but they can't be accessed when in pdf format so I am attaching it to this email as well.

Brandon Davis

From: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Sent: Tuesday, October 16, 2018 2:59 PM
To: Davis, Brandon <Brandon.Davis@conocophillips.com>; stucker@blm.gov

Cc: Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>
Subject: [EXTERNAL]RE: Wilder Federal 28-1

Mr. Davis:

Notes

- Please remember to include Christina Hernandez, the other Environmental Specialist in District 1, in all communications and report submittals.
- Unless misheard on the voicemail, the initial notification of the release was for a release volume of 81 bbls of produced water. Was this assessment based on visual estimation?

Thank you for providing the photos of the spill area and calculations to determine the release volume. Please have Conoco Phillips's Environmental Department provide the rationale for setting the proportion of soil absorption at 0.25 and soil porosity at 0.25.

In an idealized soil, 50% is pore space and 50% is solid material. Of the 50% pore space, approximately 25% is filled with air and 25% with water. The 0.25 could be interpreted as free available pore space (soil porosity %) for spill fluids to fill and the other 0.25 as not available since these spaces are filled with porewater. With the soil porosity set at 0.25, an assumption could be made that 100% of the 0.25 porosity was filled with the produced water. However, with the soil absorption proportion set at 0.25, the interpretation of the equation is that only 1/4 of the 3-inch depth entered the 0.25 pore space. Is there an misunderstanding or misuse of the term 'soil absorption'?

Please be advised that

1. Per 19.15.29.13 NMAC, regulations of corresponding agencies supersede NMOCD's.
2. Dated, geo-referenced photo documentation for verification that the initial response activities have been employed to contain the release is requested.

The 1RP for this incident is

5238	10/16/2018	A	Conoco Phillips	Wilder Federal CTB	30-025-40261	26S-32E-28A	10/10/2018

Please remember to include this 1RP identifier to all communications. Delineate and remediate per regulation. Mind the timelines for submittal of requisite information.

Please be advised that NMOCD recommends a completed site characterization/delineation report be reviewed or approved by NMOCD BEFORE any significant remediation work towards closure.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
Olivia.yu@state.nm.us
575-393-6161 x113

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Davis, Brandon <Brandon.Davis@conocophillips.com>
Sent: Friday, October 12, 2018 9:22 AM
To: stucker@blm.gov; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: [EXT] Wilder Federal 28-1

All,

Attached is the C-141 for the illegal dumping that was discovered on a ConocoPhillips well pad on 10/10/2018. This is the initial notification and attached is a document containing pictures as well as the spill calculator.

Please let me know if there is anything additional needed for the initial notification.

Thank you,

Brandon Davis
HSE Specialist
281.687.2852 - Cell
Brandon.Davis@ConocoPhillips.com