



Accountability & Enforcement

Purpose: to ensure responsible stewardship of state trust lands for the long-term benefit of the trust

Focus:

- Abandoned wells
- Soil and groundwater contamination
- Debris removal and surface reclamation

Defining the Problem

██████████ employs experienced field personnel that are present at each well site on a daily basis, and each well site is inspected on a daily basis. These field personnel have confirmed that there are no spills or unresolved environmental compliance issues at any of the above well locations. These findings are consistent with the Oil Conservation Division's records, which also do not reflect any spills or unresolved environmental incidents at these well sites.



Creating a Culture of Compliance

- Outreach and Education
- Communication
- Settlement
- Litigation

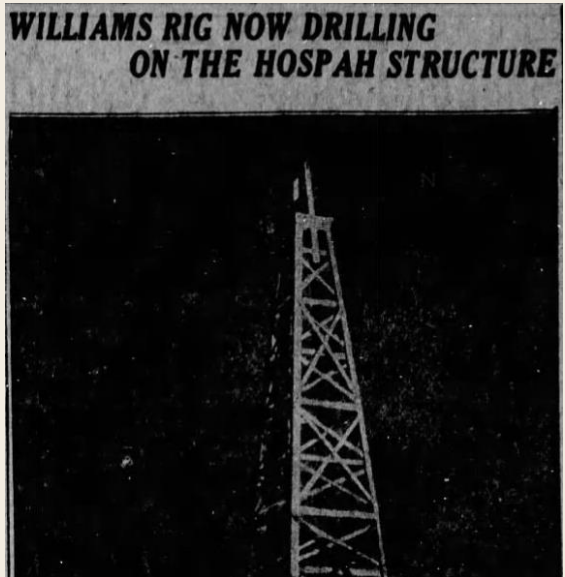
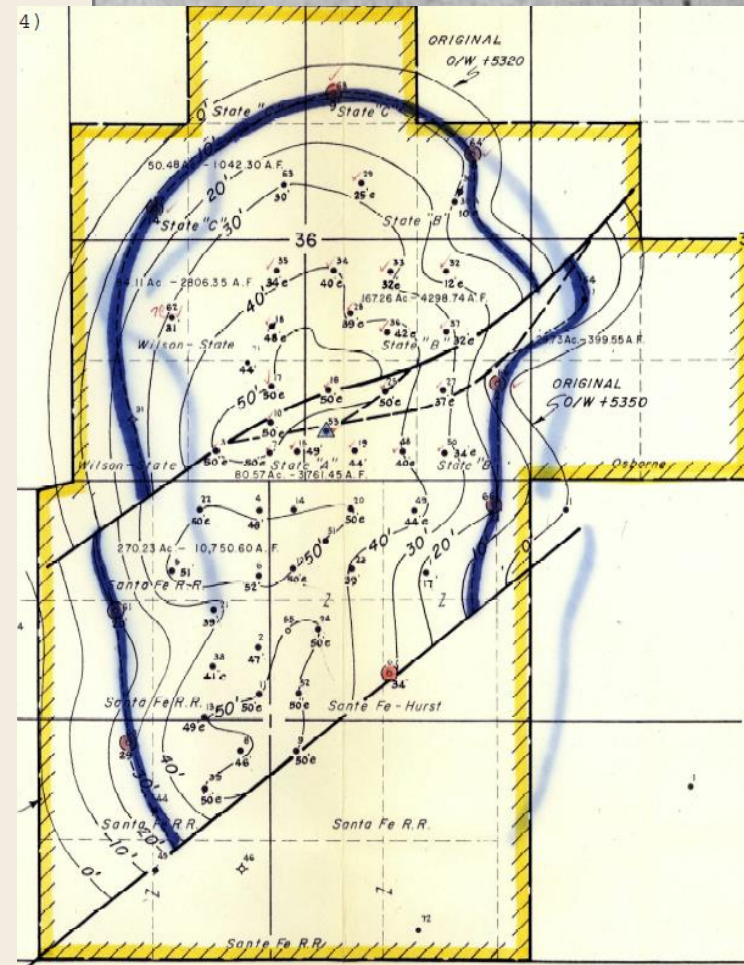


Case Study: Hospah Oil Field

"NEW MEXICO WILL SOON TAKE ITS PLACE AMONG HEAVY OIL PRODUCING STATES"—OIL AGE

PEOPLE
Coming and going in Santa Fe

Theodore N. Espe, county commissioner, has returned from the east where he had a conference with oil officials. Mr. Espe is interested in lands in the Hospah oil region, McKinley county.



FLY!
WITH SAFETY
Swastika-Eaglerock Airways Co.
 Passenger Flights. Aerial Instruction. Mapping.
 Aerial Photography.

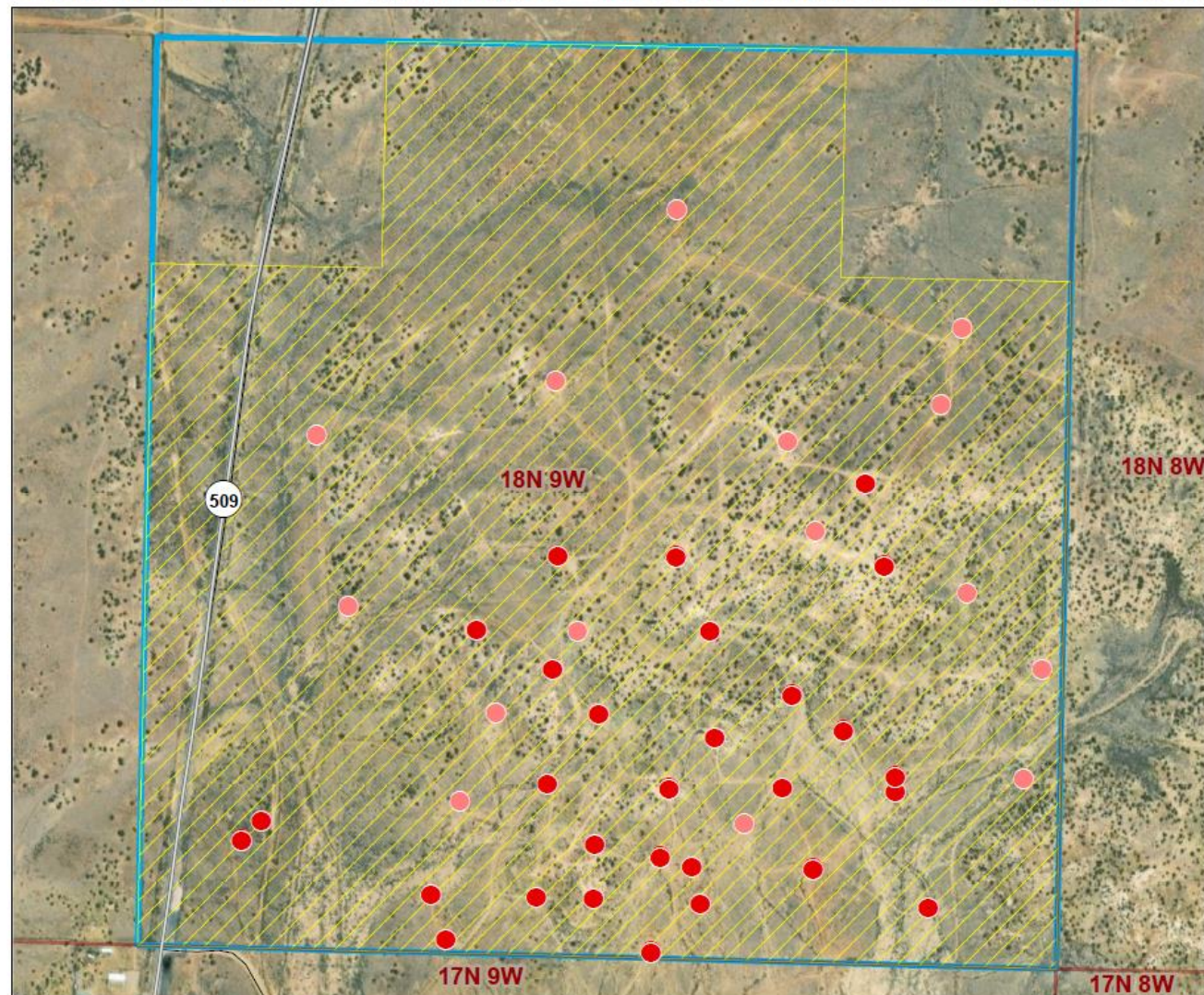
AIR PORT
 ONE MILE EAST OF UNIVERSITY
 ON CENTRAL AVENUE.

Special Rates for Passengers to
 New Hospah Oil Field

Free Exhibition Flights Sunday

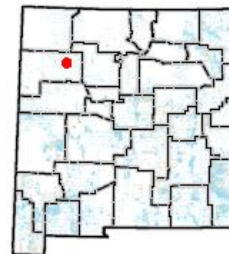
Case Study: Hospah Oil Field

Garcia Richard v. BC&D and Dominion - Location of Expired Leases and Inactive Wells




Stephanie Garcia Richard
 Commissioner of Public Lands
 505-827-5761
www.nmstatelands.org

-  Previously Leased Land
- Inactive Wells**
-  Unplugged
-  Plugged
- State Trust Land**
-  Subsurface Estate
-  Surface Estate
-  Both Estates



SOUTHWEST RESEARCH AND INFORMATION CENTER
 P.O. Box 4524 Albuquerque, NM 87106 505-262-1862

September 22, 1992

Mr. Don Elsworth
 U.S. Bureau of Land Management
 1235 La Plata Highway
 Farmington, NM 87401

Dear Mr. Elsworth:

Rob Bornstein of the U.S. EPA office in Window Rock asked that I send you a copy of SRIC's July 29, 1992, letter titled "Field Reconnaissance of Produced Water Discharges at Hospah Oil Field, McKinley County, New Mexico." This letter, a copy of which is



**THE
 NAVAJO
 NATION**

P.O. BOX 308 • WINDOW ROCK, ARIZONA 86515 • (602) 871-4941

PETERSON ZAH
 PRESIDENT

MARSHALL PLUMMER
 VICE PRESIDENT

RECEIVED

SEP 22 1992

OIL CON. DIV.
 DIST. 3

September 10, 1992
 President
 American Exploration Company
 P.O. Box 10509
 Midland, TX 79702

RE: Discharge of Produced Water and Oil at the Hospah Oil Field.

Dear Sir:

The Navajo Nation Environmental Protection Administration ("Navajo EPA") conducted a site inspection on August 28, 1992 at your Hospah Oil Field located within Section 6 and Section 7 of Township 17N, Range 8 West and Section 11 of Township 17N, Range 9 West of the Hospah USGS Quadrangle, McKinley County, New Mexico (the "Site").

Case Study: Cato San Andres Unit

Hobbs News-Sun Sunday, Oct. 16, 1966—Page 24



Lea County Oil and Gas Activities

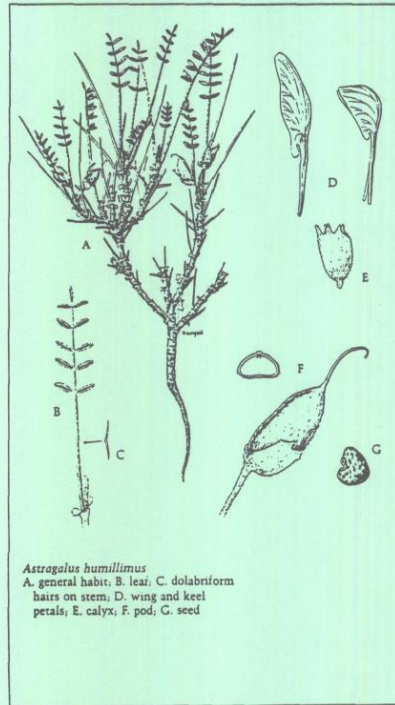
HOBBS, N. M., CAPITAL OF THE PERMIAN BASIN EMPIRE



Case Study: Hogback ACEC



MANCOS MILKVETCH (*Astragalus humillimus*) RECOVERY PLAN

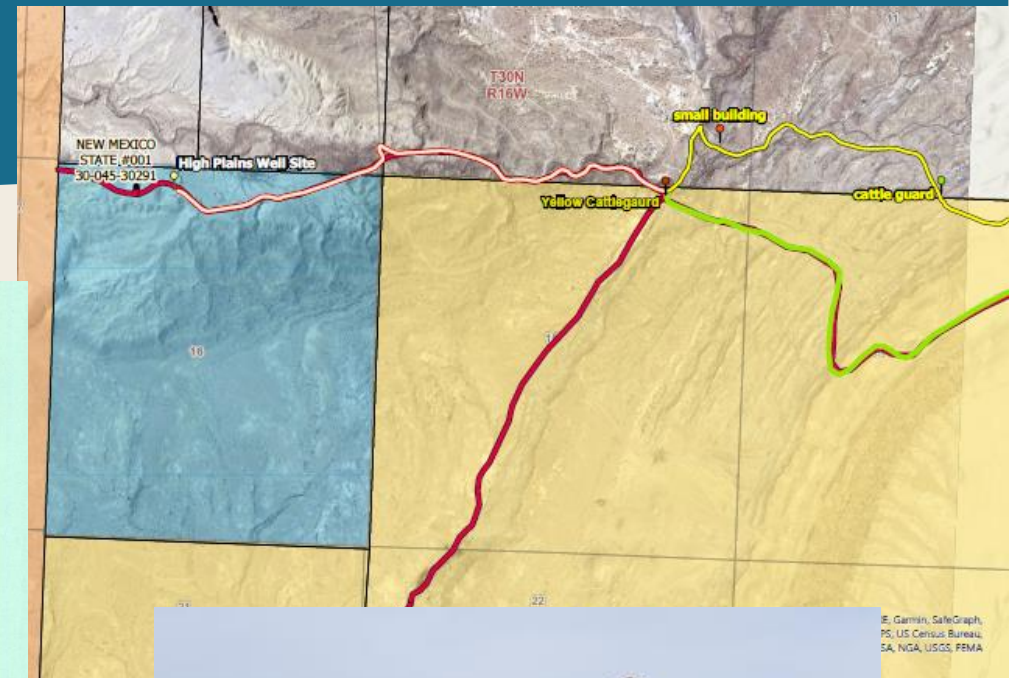


Astragalus humillimus
A, general habit; B, leaf; C, dolabriform hairs on stem; D, wing and keel petals; E, calyx; F, pod; G, seed

U.S. Fish and Wildlife Service

Albuquerque, New Mexico

1989



E. Garmin, SafeGraph,
PS, US Census Bureau,
SA, NGA, USGS, FEMA

Successes and Ongoing Challenges

Results:

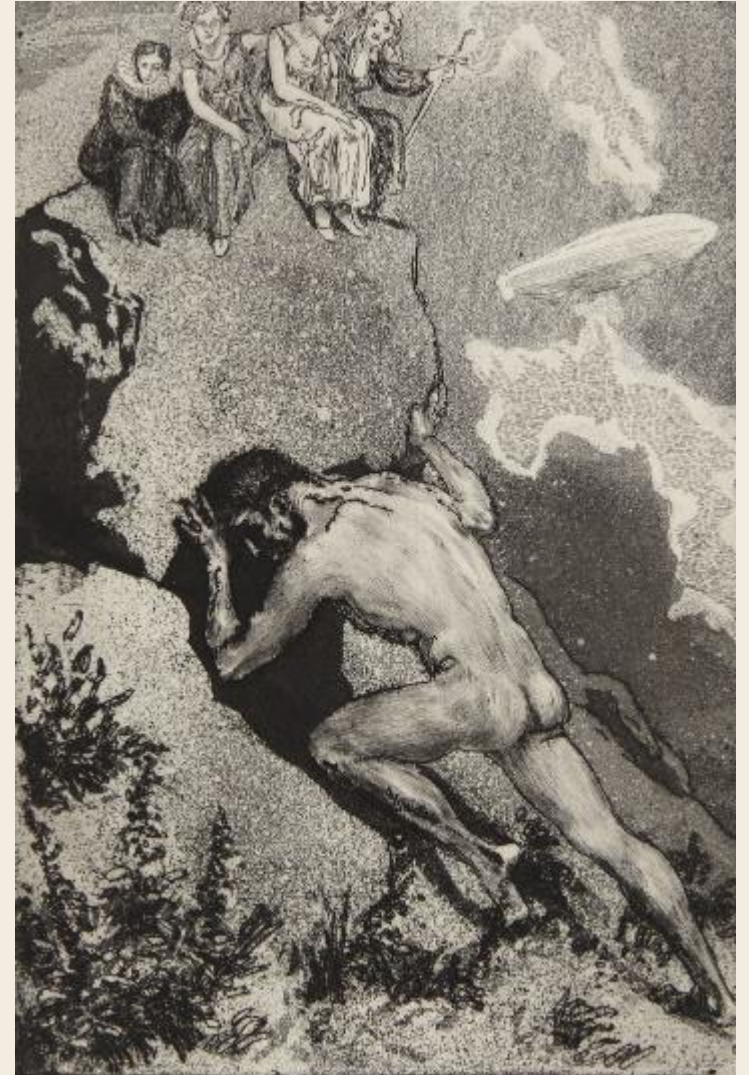
- *289 inactive wells plugged**
- *14 lease sites fully reclaimed**
- *Over \$20 million in cost savings**



Next Steps

Anchoring Progress and Avoiding Vicious Cycles

- Bond review and reform
- Watch lists/debarment
- Early warning detection
- Third-party collaboration
- Expectation-setting
- Life after oil



Accountability & Enforcement: An Organizational Perspective

- Institutional capacity
 - Leadership support
 - FTE, budget, organizational structure
 - Cross-divisional coordination
- Clear expectations
 - Industry trainings
 - Consistent application of the rules
 - Consequences for non-compliance
- Leveraging every tool in the tool box
 - Technology (satellite, change detection)
 - Pause new business, increase bonding, cancel leases, go to court

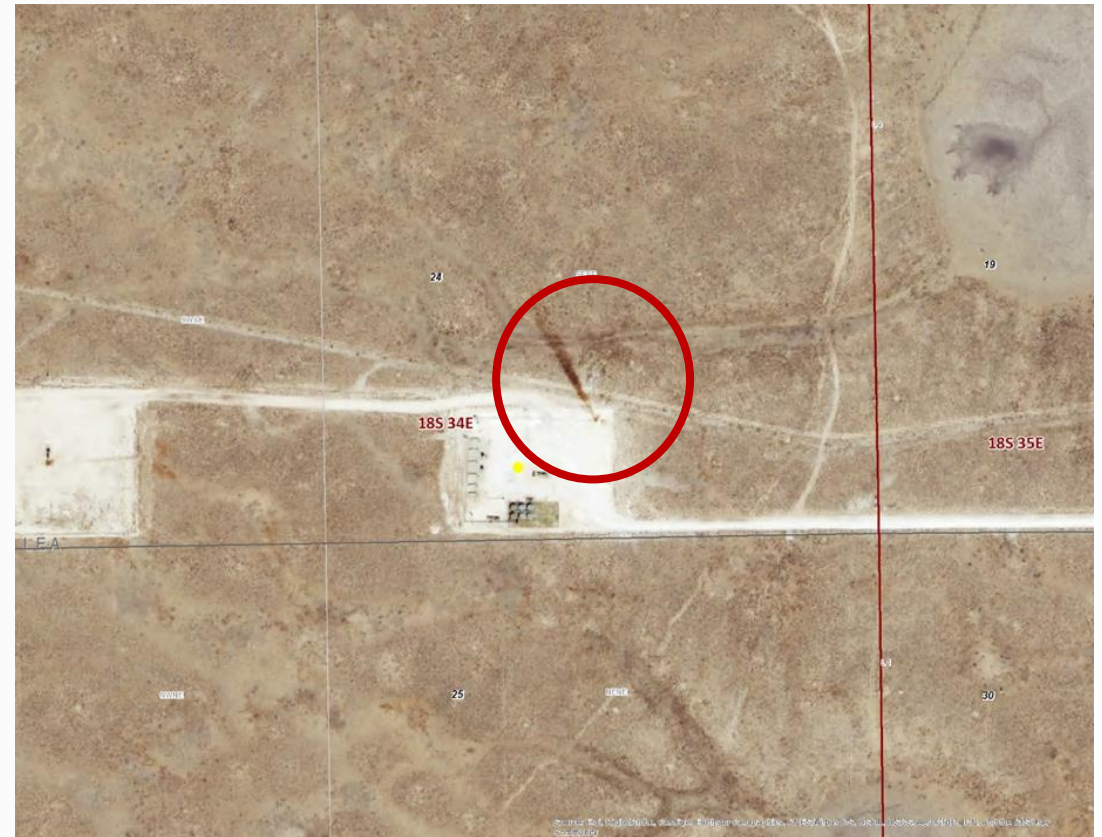


Satellite Detection Efforts

Pre-Spill



Post-Spill



Satellite Detection Efforts

Spill



Post-Remediation



Satellite Detection Efforts

Mining Trespass

Jan. 2019



Jan. 2020



Eddy County

Satellite Detection Efforts

Roswell Flooding Levy Breach



- ★ Main Breach
- ▶ Breach Under Berm
- ▶ Potential Breach Under Berm
- ▶ Breach Outside Trust Land
- Culvert

State Trust Land

- Subsurface Estate
- Surface Estate
- Both Estates

* Imagery from 6/6/2021
Planet Labs

Change Detection Dashboard

The dashboard displays a list of 19 probable ROW violations on the left. The top left shows a large '99' indicating the total count, with a note 'Last update: 6 hours ago'. The list includes details such as violation ID, description, and status.

The central panel shows a detailed view of a violation (OBJ ID 31) with the following information:

- Showing 1
- Lease Suffix: 0
- Fines
- Description: Construction Start 11-2020, Execution date 4-19-2021
- Division: Rights_of_way
- Initial_Review: Yes
- Violation: Yes
- False_Positive: No
- Division_Review: Yes
- Division_Description: Probably a violation, needs field review
- Division_Violation: Yes
- OGRID Code: 720408
- OGRID Name: MarkWest Tornado GP, LLC
- OGRID Addressee Name: Ross Thomas Short
- Tasking Needed: No
- Field_Review_Needed: Yes
- LIMS Link: <http://lms/Applications/LIMSV>

The map on the right shows a satellite view of a field with a yellow and blue marker indicating the location of the violation. The map includes a grid and a search bar.

The Layers panel on the right lists various mosaic images for change detection, with the following items checked:

- Global Monthly 2020 11 Mosaic
- Global Monthly 2020 10 Mosaic

Other layers include Global Monthly mosaics for years 2021 and 2020, ranging from 01 to 12.

Change Detection Overlay

