District I
1625 N. French Dr , Hobbs, NM 88240
District II
1301 W. Grand Avenue, 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 October 10, 2003

Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

Release Notification and Corrective Action

30-045-25080

OPERATOR

☐ Initial Report ☒ Final Report

Name of Company **ConocoPhillips Company**		Contact **Kelsi Harrington**	
Address **3401 E. 30th St., Farmington, NM 87402**		Telephone No. **505-599-3403**	
Facility Name **San Juan 32-7 Unit 41A**		Facility Type **Gas Well API#3004525080**	
Surface Owner **Federal**	Mineral Owner **Federal**		Lease No. **SF-078460**

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
N	**07**	**32N**	**07W**	**1085'**	**South**	**1820'**	**West**	**San Juan**

Latitude 36.99131° N Longitude -107.61139° W

NATURE OF RELEASE

Type of Release – **Unknown**	Volume of Release – **Unknown**	Volume Recovered –
Source of Release: **Below Grade Tank**	Date and Hour of Occurrence **Unknown**	Date and Hour of Discovery **9/7/2011**
Was Immediate Notice Given? ☐ Yes ☐ No ☒ Not Required	If YES, To Whom?	
By Whom?	Date and Hour –	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* **Below Grade Tank Closure.**

Describe Area Affected and Cleanup Action Taken.* **The sample returned results below the regulatory standards for Benzene, BTEX and Chlorides but above the regulatory standard of 100 ppm for TPH (184 ppm) using USEPA Method 418.1, confirming a release. However, as the closure standard for TPH at this site is 1,000 ppm, no further action is required.**

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: Kelsi Harrington	OIL CONSERVATION DIVISION	
Printed Name: **Kelsi Harrington**	Approved by District Supervisor:	
Title: **Environmental Consultant**	Approval Date: 10/11/11	Expiration Date:
E-mail Address: **kelsi.g.harrington@conocophillips.com**	Conditions of Approval:	Attached ☐
Date: **10/4/2011** Phone: **505-599-3403**		

* Attach Additional Sheets If Necessary

nJK1129137746

RECEIVED
OCT 2011
OIL CONS. DIV. DIST. 3

10

envirotech

September 30, 2011 Project Number 96052-2025

Ms. Kelsi Harrington
Conoco Phillips
3401 East 30th Street
Farmington, New Mexico 87401 Phone: (505) 599-3403

RE: BELOW-GRADE TANK CLOSURE DOCUMENTATION FOR THE SAN JUAN 32-7 #41A WELL SITE, SAN JUAN COUNTY, NEW MEXICO

Dear Ms. Harringon:

Enclosed please find the field notes and analytical results for below-grade tank (BGT) closure activities performed at the San Juan 32-7 #41A well site located in Section 7, Township 32 North, Range 7 West, San Juan County, New Mexico. Prior to Envirotech's arrival on September 7, 2011, the BGT had been removed. One (1) five (5)-point composite sample was collected from beneath the former BGT. The sample was analyzed in the field for total petroleum hydrocarbons (TPH) using USEPA Method 418.1, for organic vapors using a photoionization detector (PID), and for chlorides. Additionally, the sample was placed into a four (4)-ounce glass jar, capped headspace free, and transported on ice, under chain of custody, to Envirotech's Analytical Laboratory to be analyzed for TPH using USEPA Method 8015, for benzene and BTEX using USEPA Method 8021 and for total chlorides using USEPA Method 4500. The sample returned results below the regulatory standards for benzene, BTEX and chlorides but above the regulatory standard of 100 parts per million (ppm) TPH using USEPA Method 418.1, confirming a release did occur.

A brief site assessment was conducted and the regulatory standards were determined to be 1000 ppm TPH and 100 ppm organic vapors due to horizontal distance to surface water between 200 feet and 1,000 feet and depth to groundwater greater than 100 feet, pursuant to New Mexico Oil Conservation Division (NMOCD) Guidelines for Remediation of Spills, Leaks, and Releases. The sample from beneath the former BGT returned results below the regulatory standards for all constituents analyzed; see attached ***Analytical Results***. Envirotech, Inc. recommends no further action in regards to this incident.

We appreciate the opportunity to be of service. If you have any questions or require additional information, please contact our office at (505) 632-0615.

Respectfully submitted,
ENVIROTECH, INC.

Felipe Aragon
Environmental Field Technician
faragon@envirotech-inc.com

Enclosures: Analytical Results
Field Notes

Cc: Client File 92115

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EPA METHOD 418.1
TOTAL PETROLEUM HYDROCARBONS

Client:	ConocoPhillips	Project #:	96052-2025
Sample No.:	1	Date Reported:	9/29/2011
Sample ID:	BGT Composite	Date Sampled:	9/7/2011
Sample Matrix:	Soil	Date Analyzed:	9/7/2011
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
Total Petroleum Hydrocarbons	**132**	**5.0**

ND , = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: **San Juan 32-7 #41A**

Instrument calibrated to 200 ppm standard. Zeroed before each sample

Analyst

Felipe Aragon
Printed

Review

Toni Mcknight, EIT
Printed

5796 US Highway 64, Farmington, NM 87401 | Ph (505)632-0615 Fr (800)362-1879 Fx (505) 632-1865 info@envirotech-inc.com envirotech-inc.com

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CONTINUOUS CALIBRATION
EPA METHOD 418.1
TOTAL PETROLEUM
HYDROCARBONS

Cal. Date: 7-Sep-11

Parameter	Standard Concentration mg/L	Concentration Reading mg/L
TPH	100	
	200	200
	500	
	1000	

The accepted percent relative deviation (%RSD) of the calibration factor is less than 20% over the working range.

Analyst

9/29/2011
Date

Felipe Aragon
Print Name

Review

9/29/2011
Date

Toni Mcknight, EIT
Print Name

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Analytical Laboratory

EPA METHOD 8021
AROMATIC VOLATILE ORGANICS

Client:	ConocoPhillips	Project #:	96052-2025
Sample ID:	BGT	Date Reported:	09-09-11
Laboratory Number:	59566	Date Sampled:	09-07-11
Chain of Custody:	12536	Date Received:	09-07-11
Sample Matrix:	Soil	Date Analyzed:	09-08-11
Preservative:	Cool	Date Extracted:	09-08-11
Condition:	Intact	Analysis Requested:	BTEX
		Dilution:	10

Parameter	Concentration (ug/Kg)	Det. Limit (ug/Kg)
Benzene	**ND**	**0.9**
Toluene	**2.8**	**1.0**
Ethylbenzene	**ND**	**1.0**
p,m-Xylene	**7.2**	**1.2**
o-Xylene	**3.4**	**0.9**
Total BTEX	**13.4**	

ND - Parameter not detected at the stated detection limit.

Surrogate Recoveries:	Parameter	Percent Recovery
	Fluorobenzene	**105 %**
	1,4-difluorobenzene	**119 %**
	Bromochlorobenzene	**87.3 %**

References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Method 8021B, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: **San Juan 32-7 #41A.**

Analyst

Review

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Analytical Laboratory

EPA METHOD 8021
AROMATIC VOLATILE ORGANICS

Client:	N/A	Project #:	N/A
Sample ID:	0908BBLK QA/QC	Date Reported:	09-07-11
Laboratory Number:	59563	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	09-08-11
Condition:	N/A	Analysis:	BTEX
		Dilution:	10

Calibration and Detection Limits (ug/L)	I-Cal RF:	C-Cal RF:	%Diff. Accept. Range 0 - 15%	Blank Conc	Detect. Limit
Benzene	3.7583E+006	3.7658E+006	0.2%	ND	0.1
Toluene	3.8095E+006	3.8171E+006	0.2%	ND	0.1
Ethylbenzene	3.3597E+006	3.3664E+006	0.2%	ND	0.1
p,m-Xylene	9.2537E+006	9.2723E+006	0.2%	ND	0.1
o-Xylene	3.1163E+006	3.1226E+006	0.2%	ND	0.1

Duplicate Conc. (ug/Kg)	Sample	Duplicate	%Diff.	Accept Range	Detect. Limit
Benzene	ND	ND	0.0%	0 - 30%	0.9
Toluene	ND	ND	0.0%	0 - 30%	1.0
Ethylbenzene	ND	ND	0.0%	0 - 30%	1.0
p,m-Xylene	ND	ND	0.0%	0 - 30%	1.2
o-Xylene	ND	ND	0.0%	0 - 30%	0.9

Spike Conc. (ug/Kg)	Sample	Amount Spiked	Spiked Sample	% Recovery	Accept Range
Benzene	ND	500	475	95.0%	39 - 150
Toluene	ND	500	450	90.1%	46 - 148
Ethylbenzene	ND	500	448	89.7%	32 - 160
p,m-Xylene	ND	1000	897	89.7%	46 - 148
o-Xylene	ND	500	449	89.8%	46 - 148

ND - Parameter not detected at the stated detection limit.

Dilution: Spike and spiked sample concentration represent a dilution proportional to sample dilution.

References:
Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.
Method 8021B, Aromatic and Halogenated Volatiles by Gas Chromatography Using Photolonization and/or Electrolytic Conductivity Detectors, SW-846, USEPA December 1996.

Comments: QA/QC for Samples 59538, 59542, 59561, 59563-59568

Analyst

Review

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Chloride

Client:	ConocoPhillips	Project #:	96052-2025
Sample ID:	BGT	Date Reported:	09/09/11
Lab ID#:	59566	Date Sampled:	09/07/11
Sample Matrix:	Soil	Date Received:	09/07/11
Preservative:	Cool	Date Analyzed:	09/09/11
Condition:	Intact	Chain of Custody:	12536

Parameter	Concentration (mg/Kg)
Total Chloride	**20**

Reference: U.S.E.P.A., 4500B, "Methods for Chemical Analysis of Water and Wastes", 1983.
Standard Methods For The Examination of Water And Waste Water", 18th ed., 1992.

Comments: **San Juan 32-7 #41A.**

Analyst

Review

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*Rush

CHAIN OF CUSTODY RECORD

12536

Client: ConocoPhillips	Project Name / Location: San Juan 32-7 #41A
Client Address:	Sampler Name: F. Aragon / R. Garcia
Client Phone No.:	Client No.: 96052-2025

ANALYSIS / PARAMETERS

Sample No./ Identification	Sample Date	Sample Time	Lab No.	Sample Matrix	No./Volume of Containers	Preservative HgCl₂	Preservative HCl	Preservative Cool	TPH (Method 8015)	BTEX (Method 8021)	VOC (Method 8260)	RCRA 8 Metals	Cation / Anion	RCI	TCLP with H/P	PAH	TPH (418.1)	CHLORIDE				Sample Cool	Sample Intact
BGT	9-7-11	16:25	59566	Soil (circled) Sludge Solid Aqueous	1/4oz			X		X								X				Y	Y
				Soil Sludge Solid Aqueous																			
				Soil Sludge Solid Aqueous																			
				Soil Sludge Solid Aqueous																			
				Soil Sludge Solid Aqueous																			
				Soil Sludge Solid Aqueous																			
				Soil Sludge Solid Aqueous																			
				Soil Sludge Solid Aqueous																			
				Soil Sludge Solid Aqueous																			
				Soil Sludge Solid Aqueous																			

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
F. Aragon	9-7-11	18:05	Janet Carpenter	9-8-11	705
Relinquished by: (Signature)			Received by: (Signature)		
Relinquished by: (Signature)			Received by: (Signature)		

Rush

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Analytical Laboratory

5796 US Highway 64 • Farmington, NM 87401 • 505-632-0615 • lab@envirotech-inc.com

Client: ConocoPhillips

envirotech
(505) 632-0615 (800) 362-1879
5796 U.S. Hwy 64, Farmington, NM 87401

Project No: 96052-2025
COC No: 12536

FIELD REPORT: SPILL CLOSURE VERIFICATION

PAGE NO: 1 OF
DATE STARTED: 9-7-11
DATE FINISHED:
ENVIRONMENTAL SPECIALIST: FA/RG

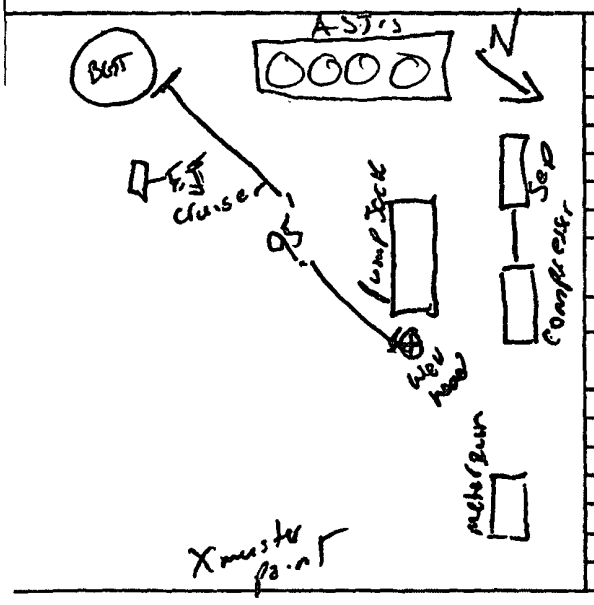
LOCATION: NAME: San Juan 32-7 WELL #: 91A
QUAD/UNIT: N SEC: 7 TWP: 32N RNG: 7W PM: CNTY: SJ ST: NM
QTR/FOOTAGE: CONTRACTOR:

EXCAVATION APPROX: 14 FT. X FT. X FT. DEEP CUBIC YARDAGE:
~~DISPOSAL FACILITY~~: ~~REMEDIATION METHOD~~:
LAND USE: Federal LEASE: SF 078460 LAND OWNER:
CAUSE OF RELEASE: overflow MATERIAL RELEASED: Produced H_2O

SPILL LOCATED APPROXIMATELY: 95 FT. 180° FROM Well Head
DEPTH TO GROUNDWATER: >500' NEAREST WATER SOURCE: 301' NEAREST SURFACE WATER:
NMOCD RANKING SCORE: 10 NMOCD TPH CLOSURE STD: 1000 PPM
SOIL AND EXCAVATION DESCRIPTION:

SAMPLE DESCRIPITION	TIME	SAMPLE I.D.	LAB NO.	WEIGHT (g)	mL FREON	DILUTION	READING	CALC. ppm
	16:25	200 STD					200	
BGT Comp	16:28	1					33	132

SPILL PERIMETER



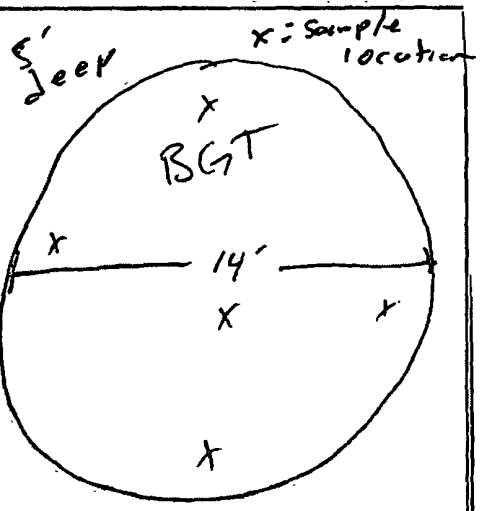
OVM RESULTS

SAMPLE ID	FIELD HEADSPACE PID (ppm)
1	0.0

LAB SAMPLES

SAMPLE ID	ANALYSIS	TIME
1	8021/8015	16:18

SPILL PROFILE



TRAVEL NOTES: CALLED OUT: ONSITE:

COC 12536

PAGE NO: ____ OF ____	envirotech 5796 U.S. Hwy 64, Farmington, NM 87401 PHONE: (505) 632-0615	ENVIRONMENTAL SPECIALIST: R.G IF.A
DATE STARTED: 9-7-2011		LAT: 36.99137°C101
DATE FINISHED:		LONG: -107.611950126

FIELD REPORT: BGT / PIT CLOSURE VERIFICATION

LOCATION:	NAME: San Juan 32-7	WELL #: 41A	TEMP PIT:	PERMANENT PIT:	BGT: ✓	
LEGAL ADD:	UNIT: N	SEC: 7	TWP: 32 N	RNG: 7W	PM:	
QTR/FOOTAGE:		CNTY: San Juan	ST: N.M			

EXCAVATION APPROX:	FT. X	FT. X	FT. DEEP CUBIC YARDAGE:
DISPOSAL FACILITY:		REMEDIATION METHOD:	
LAND OWNER:	Federal	API: 3004525080	BGT / PIT VOLUME: 42.5 bbl
CONSTRUCTION MATERIAL:	Steel	DOUBLE-WALLED, WITH LEAK DETECTION:	NO

LOCATION APPROXIMATELY: 45 FT. 180° FROM WELLHEAD

DEPTH TO GROUNDWATER: > 100'

___ TEMPORARY PIT - GROUNDWATER 50-100 FEET DEEP

BENZENE ≤ 0.2 mg/kg, BTEX ≤ 50 mg/kg, GRO & DRO FRACTION (8015) ≤ 500 mg/kg, TPH (418.1) ≤ 2500 mg/kg, CHLORIDES ≤ 500 mg/kg

___ TEMPORARY PIT - GROUNDWATER ≥100 FEET DEEP

BENZENE ≤ 0.2 mg/kg, BTEX ≤ 50 mg/kg, GRO & DRO FRACTION (8015) ≤ 500 mg/kg, TPH (418.1) ≤ 2500 mg/kg, CHLORIDES ≤ 1000 mg/kg

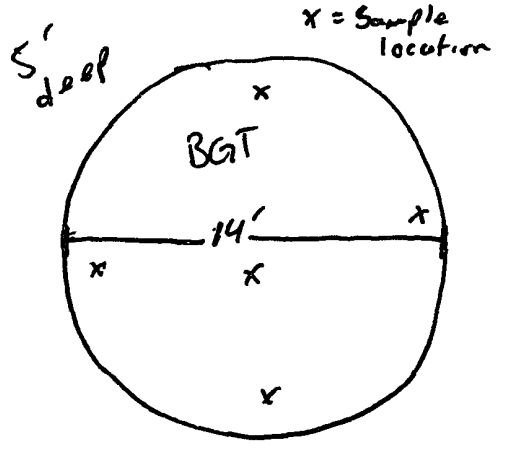
___ PERMANENT PIT OR BGT

BENZENE ≤ 0.2 mg/kg, BTEX ≤ 50 mg/kg, TPH (418.1) ≤ 100 mg/kg, CHLORIDES ≤ 250 mg/kg

FIELD 418.1 ANALYSIS

TIME	SAMPLE I.D.	LAB NO.	WEIGHT (g	mL FREON	DILUTION	READING	CALC. (mg/kg)
~~16:25~~	200 STD		-	-	-	200	
16:28	BGT Comp	1				33	132
		2					
		3					
		4					
		5					
		6					

PERIMETER



FIELD CHLORIDES RESULTS

SAMPLE ID	READING	CALC. (mg/kg)
~~1~~	~~ND~~	
1	0.4	ND <32

PID RESULTS

SAMPLE ID	RESULTS (mg/kg)
BGT Comp	0.0

PROFILE

LAB SAMPLES

SAMPLE ID	ANALYSIS	RESULTS
	BENZENE	
	BTEX	
	GRO & DRO	
	CHLORIDES	

NOTES:

WORKORDER # WHO ORDERED