



CONOCOPHILLIPS

P.O. Box 2197
Houston, TX 77252-2197
Phone 281.293.1000

VGEU Well 034 (1RP-3438)

Corrective Action Plan

API No. 30-025-02881

Release Date: July 6th, 2014

Unit Letter G, Section 26, Township 17S, Range 35E

January 5th, 2015

Dr. Tomáš Oberding, PhD

Environmental Specialist – New Mexico Oil Conservation Division
Energy, Minerals and Natural Resources Department
1625 N. French Dr.
Hobbs, NM 88240

**RE: Corrective Action Plan
ConocoPhillips VGEU Well 034 (1RP-3438)
UL/G sec. 26 T17S R35E
API No. 30-025-02881**

Dr. Oberding:

ConocoPhillips (CoP) has retained Rice Environmental Consulting and Safety (RECS) to address potential environmental concerns at the above-referenced site.

Background and Previous Work

The site is located approximately 4.6 miles east of Buckeye, New Mexico at UL/G sec. 26 T17S R35E. Records from RECS installed monitor wells and USGS wells indicate that groundwater will likely be encountered at a depth of approximately 52 +/- feet.

On July 6th, 2014, CoP discovered that the well's stuffing box was leaking. The well was shut in, and the packing for the stuffing box was replaced. A total of 11.75 barrels of primarily produced water was released over 2,040 square feet of lease pad. Ten barrels of the released fluid was recovered. NMOCD was notified of the release on July 8th, 2014, and an initial C-141 was sent to NMOCD for their approval (Appendix A).

RECS personnel were on site beginning on November 18th, 2014. The release was GPS mapped, and two points within the release area were sampled at the surface (Figure 1). Samples with depth were not taken given how indurate the soil is at the site. The samples were field tested for chlorides and organic vapors and then taken to a commercial laboratory for analysis (Appendix B). Both surface samples returned elevated laboratory chloride readings and Gasoline Range Organics (GRO) and Diesel Range Organics (DRO) readings of non-detect, except for the DRO reading at Point 2, which returned a value of 70.2 mg/kg.

Photo documentation of the release can be found in Appendix C.

Corrective Action Plan

Based on the laboratory analysis of the release, the release will be scraped down 6 inches. Once the scrape is completed, a composite sample from the bottom of the scrape will be taken and

field tested for chlorides and organic vapors. If the field data indicates that the composite will not achieve chloride, GRO and DRO readings below regulatory standards, the scrape will be deepened until field testing indicates that all constituents from the bottom composite will return values below regulatory standards. The bottom composite will then be taken to a commercial laboratory to confirm that chloride, GRO and DRO readings are below regulatory standards.

All excavated soils will be taken to a NMOCD approved facility for disposal. Clean caliche will be imported to the site to serve as backfill. A sample of the imported caliche will be taken to a commercial laboratory to confirm that the chloride value is below regulatory standards. The scrape will be backfilled with the imported caliche and contoured to the surrounding location.

Once these activities have been completed, a report will be sent to NMOCD requesting 'remediation termination' and site closure.

RECS appreciates the opportunity to work with you on this project. Please call Hack Conder at (575) 393-2967 or me if you have any questions or wish to discuss the site.

Sincerely,

A handwritten signature in dark ink, appearing to read "L. Weinheimer", with a long, horizontal, slightly wavy line extending to the right.

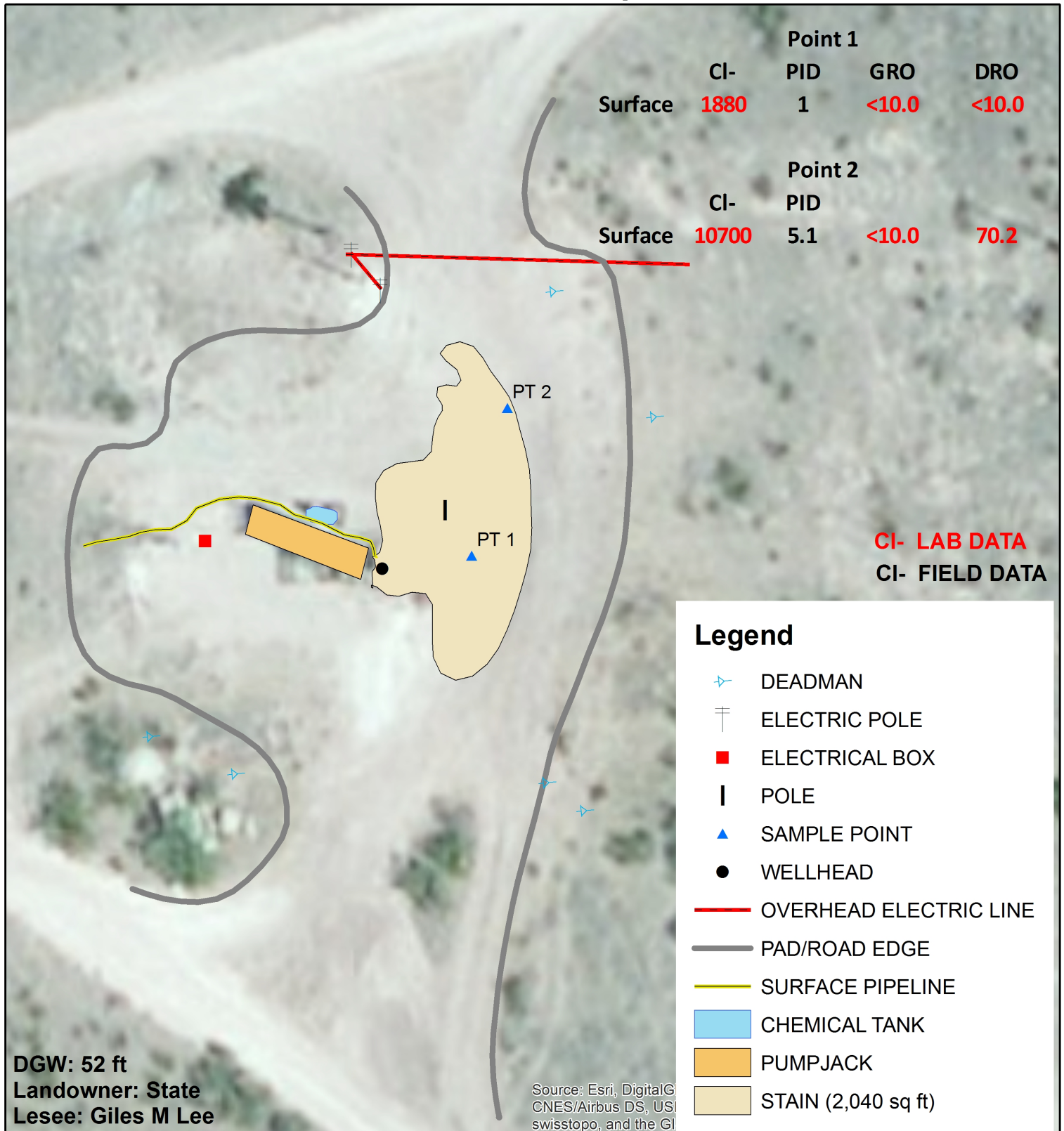
Lara Weinheimer
Project Scientist
RECS
(575) 441-0431

Attachments:

- Figure 1 – Initial Sampling Data
- Appendix A – Initial C-141
- Appendix B – Initial Sampling Lab
- Appendix C – Photo Documentation

Figures

Initial Sampling Data



CONOCOPHILLIPS VGEU WELL 034

Legals: UL/G sec. 26
T-17-S R-35-E
LEA COUNTY, NM

Figure 1

0 20 40
Feet

GPS date: 11/18/14
Drawing date: 11/19/14
Drafted by: L. Weinheimer



Appendix A

Initial C-141

District I
1000 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
220 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 August 8, 2011

Submit 1 Copy to appropriate District Office in
accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: ConocoPhillips	Contact: Spencer Cluff	
Address: 29 Vacuum Complex Lane	Telephone No. 575-391-3143	
Facility Name: VGEU Well 034	Facility Type: Oil Well	
Surface Owner: NMOCD	Mineral Owner NMOCD	API No. 3002502881

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
G	26	17S	35E	1980	North	2200	East	LEA

Latitude 32.8076533080148 Longitude - 103.426925251861

NATURE OF RELEASE

Type of Release: Spill	Volume of Release: 92 BBLS	Volume Recovered: 50 BBLS
Source of Release: Stuffing Box	Date and Hour of Occurrence 7/06/2014 2:00 p.m.	Date and Hour of Discovery 7/07/2014 10:00 a.m.
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Geoffrey Leking	
By Whom? Spencer Cluff	Date and Hour: 07/8/2014 3:00 p.m.	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

ENV - Agency Reportable - EVGSAU 2622 - 10.75 BPW 1 BO - RR II - MCBU - Buckeye: On July 6, 2014 at approximately 1400 hrs. MST, a stuffing box leak occurred at the EVGSAU 035. MSO isolated the well and changed the packing in the stuffing box. The spill occurred due to worn out packing. The spill area was measured in two sections; 1) 30 ft. X 18 ft. X 2 inches deep, 2) 12 ft. X 30 ft. X 2 inches deep. The total volume of the spill was 11.75 barrels, 1 barrel of crude oil and 10.75 barrels of produced water, with 10 barrels recovered. A work order to remediate the area has been submitted and the area will be remediated according to NMOCD guidelines.

Describe Area Affected and Cleanup Action Taken.* The spill area was measured in two sections; 1) 30 ft. X 18 ft. X 2 inches deep, 2) 12 ft. X 30 ft. X 2 inches deep. Spill stayed on the caliche pad. MSO shut in the well and placed the packing.

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: Spencer A. Cluff		<u>OIL CONSERVATION DIVISION</u>	
Printed Name: Spencer Cluff		Approved by Environmental Specialist:	
Title: LEAD HSE		Approval Date:	Expiration Date:
E-mail Address: spencer.a.cluff@conocophillips.com		Conditions of Approval:	Attached <input type="checkbox"/>
Date: 07/8/2014		Phone: 575-391-3143	

* Attach Additional Sheets If Necessary

Appendix B

Initial Sampling Lab

RICE Environmental Consulting and Safety (RECS)
P.O. Box 2948 Hobbs, NM 88241
Phone 575.393.2967



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

November 21, 2014

LAURA FLORES

RICE ENVIRONMENTAL CONSULTING & SAFETY LLC

419 W. CAIN

HOBBS, NM 88240

RE: EVGSAU #034

Enclosed are the results of analyses for samples received by the laboratory on 11/19/14 8:07.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive, flowing style.

Celey D. Keene

Lab Director/Quality Manager

Analytical Results For:

 RICE ENVIRONMENTAL CONSULTING & SAFETY
 LAURA FLORES
 419 W. CAIN
 HOBBS NM, 88240
 Fax To: (575) 397-1471

Received:	11/19/2014	Sampling Date:	11/18/2014
Reported:	11/21/2014	Sampling Type:	Soil
Project Name:	EVGSAU #034	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: POINT 1 @ SURFACE (H403552-01)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1880	16.0	11/20/2014	ND	400	100	400	0.00	
TPH 8015M		mg/kg		Analyzed By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	11/20/2014	ND	182	90.8	200	3.28	
DRO >C10-C28	<10.0	10.0	11/20/2014	ND	182	90.8	200	3.21	
Surrogate: 1-Chlorooctane	115 %	47.2-157							
Surrogate: 1-Chlorooctadecane	129 %	52.1-176							

Sample ID: POINT 2 @ SURFACE (H403552-02)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	10700	16.0	11/20/2014	ND	400	100	400	0.00	
TPH 8015M		mg/kg		Analyzed By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	11/20/2014	ND	182	90.8	200	3.28	
DRO >C10-C28	70.2	10.0	11/20/2014	ND	182	90.8	200	3.21	
Surrogate: 1-Chlorooctane	121 %	47.2-157							
Surrogate: 1-Chlorooctadecane	138 %	52.1-176							

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

 101 East Marland, Hobbs, NM 88240
 (575) 393-2326 FAX (575) 393-2476

Company Name: RECS		BILL TO		ANALYSIS REQUEST																						
Project Manager: Laura Flores, Jacob Kampman		P.O. #:																								
Address:		Company:																								
City:	State:	Zip:	Attn:																							
Phone #:	Fax #:	Address:																								
Project #:	Project Owner:		City:																							
Project Name:		State:												Zip:												
Project Location: EUGSAU #034		Phone #:																								
Sampler Name: Kyle Schnaicht		Fax #:																								
FOR LAB USE ONLY		MATRIX		PRESERV.		SAMPLING																				
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:	ICE / COOL	OTHER :	DATE	TIME												
H403552																										
	1 Point 1 @ surface	6	1			X					X		11-18-14	1:30	X	X										
	2 Point 2 @ surface	6	1			X					X		11-18-14	1:35	X	X										

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Relinquished By:	Date: 11-18-14	Received By:	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
Kyle Schnaicht	Time: 5:07	Jodi Benson	Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:
Relinquished By:	Date:	Received By:	REMARKS:	
	Time:		All PLZ	
Delivered By: (Circle One)	Sample Condition	CHECKED BY:		
Sampler - UPS - Bus - Other:	Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	5.02 gms		

Appendix C

Photo Documentation

RICE Environmental Consulting and Safety (RECS)
P.O. Box 2948 Hobbs, NM 88241
Phone 575.393.2967

ConocoPhillips VGEU Well 034

Unit Letter G, Section 26, T17S, R35E



Initial release area, facing north

11/18/14



Initial release area, facing south

11/18/14