

**RECEIVED** By JKeyes at 1:10 pm, Dec 22, 2015

**APPROVED** By JKeyes at 1:10 pm, Dec 22, 2015

### **CONOCOPHILLIPS**

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

### MCA #126 (1RP-3542)

## Corrective Action Plan

API No. 30-025-12709

Release Date: February 24<sup>th</sup>, 2015

Unit Letter A, Section 26, Township 17S, Range 32E



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

#### December 22, 2015

Jamie Keyes 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 MCA #126 (1RP-3542) UL/A sec. 26 T17S R32E API No. 30-025-12709

Mr. Keyes:

ConocoPhillips (CoP) has retained Basin Environmental Service Technologies to address potential environmental concerns at the above-referenced site.

#### **Background and Previous Work**

The site is located approximately 3.6 miles southeast of Maljamar, New Mexico at UL/A sec. 26 T17S R32E. NM OSE, BLM and Basin installed monitor well records indicate that groundwater will likely be encountered at a depth of approximately 69 +/- feet.

On February 24<sup>th</sup>, 2015, CoP discovered a stuffing box leak during normal rounds. A total of 5.1 barrels of oil and 5.1 barrels of produced water was released over 590 sq ft of caliche pad with 5 barrels of oil and 5 barrels of produced water recovered. BLM and NMOCD were notified of the release on February 25<sup>th</sup>, 2015, and an initial C-141 was submitted to both parties the same day. NMOCD approved the initial C-141 on February 25<sup>th</sup>, 2015 (Appendix A).

On December 16<sup>th</sup>, 2015, Basin personnel were on site to assess the release. Two points within the release area were sampled with depth (Figure 1). All samples were field tested for chlorides and organic vapors, and representative samples were taken to a commercial laboratory for analysis (Appendix B).

Photo Documentation of these activities may be found in Appendix C.

#### **Corrective Action Plan**

Based on the assessment, the release will be scraped down to 6 inches bgs. All excavated soil will be taken to a NMOCD approved facility for disposal. Clean soil will be imported to the site to serve as backfill. A sample of the backfill soil will be taken to a commercial laboratory to confirm that the chloride reading is below regulatory standards. The lease pad will be backfilled with clean, imported caliche. The site will be contoured to the surrounding location.

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

Basin appreciates the opportunity to work with you on this project. Please contact me if you have any questions or wish to discuss the site.

Sincerely,

Kyle Norma\_\_\_\_

Kyle Norman Project Lead Basin Environmental Service Technologies (575) 942-8542

Attachments: Figure 1 – Initial Sampling Appendix A – Initial C-141 Appendix B – Laboratory Analysis Appendix C – Photo Documentation

# Figures

Basin Environmental Service Technologies, LLC P.O. Box 2948, Hobbs, NM 88241 Phone 575.393.2967

### **Initial Sampling**

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6"	528	2.8	<10	669		< 0.05				
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### Appendix A Intial C-141

Basin Environmental Service Technologies, LLC P.O. Box 2948 Hobbs, NM 88241 Phone 575.393.2967 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 Mexic By OCD; Dr. Oberding at 10:36 am, Feb 25, 2015 Energy Minerals and Natural Resources Revised August 8, 2011

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

				58	inta F	e, NM 8/5	05									
			Rele	ease Notific	catio	n and Co	orrective A	ction	L							
						<b>OPERA</b>	ΓOR		🖂 Initial Report 🗌 Final Repo							
Name of Co						Contact: Jay	1		1							
Address: 29		_	Jane			Telephone No. 575-704-2455										
Facility Nat	me: MCA	#126				Facility Typ	e: Well									
Surface Ow	ner: NMO	CD		Mineral C	)wner:	BLM			API No	. 30-025-′	2709	9				
				LOCA	N OF REI	LEASE										
Unit Letter	Section	Township	Range	Feet from the		/South Line	Feet from the	East/V	West Line	County						
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Describe Ar	ea Affecte	d and Clear	up Action	Taken.*												
				5.1 barrels of oil pad and was con												
regulations a public health should their	ll operators or the environment operations h nment. In a	are required ronment. The ave failed to addition, NM	to report ar e acceptanc adequately OCD accep	e is true and comp nd/or file certain r ce of a C-141 repo y investigate and r ptance of a C-141	elease n ort by th emediat	notifications and le NMOCD m te contaminati	nd perform correc arked as "Final Ro on that pose a thre	tive acti eport" d eat to gr	ions for rele loes not reli round water	eases which eve the oper , surface wa	may e rator o iter, hi	endanger of liability uman health				
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Signature: 9	ay Garcia					Hydrologist										
Printed Nam	,,	9				Approved by Environmental Specialist:										
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Title: LEAD	пэе					Approval Dal	e		Expiration		04/25/	2015				
E-mail Addr	ess: <b>jay.c.</b>	garcia@co	onocoph	illips.com		Conditions of	Approval:									
							s required. Delines NMOCD guides.	ate and	remediate	Attached						

Phone:575-704-2455

Date: 01/06/2015 \* Attach Additional Sheets If Necessary

217817

1RP-3542

### Appendix B Laboratory Analysis

Basin Environmental Service Technologies, LLC P.O. Box 2948 Hobbs, NM 88241 Phone 575.393.2967



December 18, 2015

KYLE NORMAN Basin Environmental Service P.O. Box 301 Lovington, NM 88260

RE: MCA #126

Enclosed are the results of analyses for samples received by the laboratory on 12/17/15 11:00.

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 <a href="https://www.tceq.texas.gov/field/ga/lab\_accred\_certif.html">www.tceq.texas.gov/field/ga/lab\_accred\_certif.html</a>.

Cardinal Laboratories is accreditated 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,

Celey D. Keine

Celey D. Keene Lab Director/Quality Manager



#### Analytical Results For:

Basin Environmental Service KYLE NORMAN P.O. Box 301 Lovington NM, 88260 Fax To: (575) 396-1429

Received:	12/17/2015	Sampling Date:	12/16/2015
Reported:	12/18/2015	Sampling Type:	Soil
Project Name:	MCA #126	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

#### Sample ID: PT. 1 @ 6" (H503281-01)

BTEX 8021B	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	12/17/2015	ND	2.09	104	2.00	5.69	
Toluene*	<0.050	0.050	12/17/2015	ND	2.07	104	2.00	6.88	
Ethylbenzene*	<0.050	0.050	12/17/2015	ND	2.10	105	2.00	7.92	
Total Xylenes*	<0.150	0.150	12/17/2015	ND	6.34	106	6.00	6.97	
Total BTEX	<0.300	0.300	12/17/2015	ND					
Surrogate: 4-Bromofluorobenzene (PID	108 9	73.6-14	0						
Chloride, SM4500Cl-B	mg/	kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	144	16.0	12/17/2015	ND	432	108	400	3.64	
TPH 8015M	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	12/18/2015	ND	206	103	200	1.31	
DRO >C10-C28	833	10.0	12/18/2015	ND	194	96.9	200	3.20	
Surrogate: 1-Chlorooctane	101 9	35-147							

#### Cardinal Laboratories

\*=Accredited Analyte

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 client for analyses. All claims, including those for negligence and any other cause whatscever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, whot limitation, business interruptions, loss of gronts incurred by client, its subsidiaries, affiliates or successor arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



#### Analytical Results For:

Basin Environmental Service KYLE NORMAN P.O. Box 301 Lovington NM, 88260 Fax To: (575) 396-1429

Received:	12/17/2015	Sampling Date:	12/16/2015
Reported:	12/18/2015	Sampling Type:	Soil
Project Name:	MCA #126	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

#### Sample ID: PT. 2 @ 6" (H503281-02)

BTEX 8021B	mg/	kg	Analyze	d By: MS					
Analyte	Result Reporting Limit		Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	12/17/2015	ND	2.09	104	2.00	5.69	
Toluene*	<0.050	0.050	12/17/2015	ND	2.07	104	2.00	6.88	
Ethylbenzene*	<0.050	0.050	12/17/2015	ND	2.10	105	2.00	7.92	
Total Xylenes*	<0.150	0.150	12/17/2015	ND	6.34	106	6.00	6.97	
Total BTEX	<0.300	0.300	12/17/2015	ND					
Surrogate: 4-Bromofluorobenzene (PID	107 9	73.6-14	0						
Chloride, SM4500Cl-B	mg/	kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Analyzed Method Blank		% Recovery	True Value QC	RPD	Qualifier
Chloride	528	16.0	12/17/2015	ND	432	108	400	3.64	
TPH 8015M	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	12/18/2015	ND	206	103	200	1.31	
DRO >C10-C28	669	10.0	12/18/2015	ND	194	96.9	200	3.20	
Surrogate: 1-Chlorooctane	83.8	% 35-147							
Surrogate: 1-Chlorooctadecane	91.2	% 28-171							

#### **Cardinal Laboratories**

#### \*=Accredited Analyte

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Celeg D. Keine

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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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager

Page 4 of 5

Address: City: Project Name: Project Name: Project Location: MCA #126 Sampler Name: Kyle Norman FOR LAB USE ONLY Port Lab I.D. FOR LAB USE ONLY Port 1 @ 6" 2 Pt. 2 @ <b># 6</b> " 2 Pt. 2 @ <b># 6</b> " 3 analyse. Cardinals laid 3 analyse. At datims including these for mediates to the mediates or related to the po- Bellinquished By: Citrcle Onel 3 ampler - UPS - Bus - Other 1 Cardinal cannot accept	Conoco Phillips Kyle Norman	AL ast M
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State:       Zip:       Atm:         Fax #:       Project Owner:       City: Hobbs         Project Owner:       City: Hobbs         Project Owner:       State: NM         Sample I.D.       Prove #:         Sample Contrainers       Prove #:         Sample Contrainers       Prove #:         Sample Contrainers       Prove #:         Time:       Prove #:         Time:       Prove #:         Time:       Prove #:         Prove #:	P.O. #: Company: Basin Environmental	
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Page 5 of 5



December 21, 2015

KYLE NORMAN Basin Environmental Service P.O. Box 301 Lovington, NM 88260

RE: MCA #126

Enclosed are the results of analyses for samples received by the laboratory on 12/18/15 16:15.

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Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

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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,

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Celey D. Keene Lab Director/Quality Manager



#### Analytical Results For:

Basin Environmental Service KYLE NORMAN P.O. Box 301 Lovington NM, 88260 Fax To: (575) 396-1429

Received:	12/18/2015	Sampling Date:	12/16/2015
Reported:	12/21/2015	Sampling Type:	Soil
Project Name:	MCA #126	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

#### Sample ID: PT. 2 @ 1' (H503299-01)

BTEX 8021B	mg/	kg	Analyze	d By: MS					
Analyte	Result Reporting Limi		Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	12/21/2015	ND	2.20	110	2.00	1.51	
Toluene*	<0.050	0.050	12/21/2015	ND	2.25	113	2.00	1.29	
Ethylbenzene*	<0.050	0.050	12/21/2015	ND	2.06	103	2.00	2.62	
Total Xylenes*	<0.150	0.150	12/21/2015	ND	6.56	109	6.00	1.77	
Total BTEX	<0.300	0.300	12/21/2015	ND					
Surrogate: 4-Bromofluorobenzene (PID	99.8	% 73.6-14	5.6-140						
Chloride, SM4500Cl-B	mg/	kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Analyzed Method Blank		% Recovery	True Value QC	RPD	Qualifier
Chloride	176	16.0	12/21/2015	ND	400	100	400	0.00	
TPH 8015M	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	12/19/2015	ND	173	86.5	200	7.80	
DRO >C10-C28	131	10.0	12/19/2015	ND	180	90.0	200	9.08	
Surrogate: 1-Chlorooctane	108 9	35-147	,						
Surrogate: 1-Chlorooctadecane	6 28-171								

#### Cardinal Laboratories

\*=Accredited Analyte

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



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- ND
   Analyte NOT DETECTED at or above the reporting limit

   RPD
   Relative Percent Difference
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- \*\*\* 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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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager

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### Appendix C Photo Documentation

Basin Environmental Service Technologies, LLC P.O. Box 2948 Hobbs, NM 88241 Phone 575.393.2967

### Conoco Phillips MCA #126 (1RP-3542)

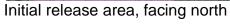
Unit Letter A, Section 26, T17S, R32E



Initial release area, facing west south west 12/16/2015







12/16/2015



Collecting sample, facing north

12/16/2015