

**APPROVED** By JKeyes at 1:04 pm, Jan 06, 2016

### ConocoPhillips

### **CONOCOPHILLIPS**

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

# Philmex 04

# **Termination Request**

API No. 3002530394

Release Date: June 26<sup>th</sup>, 2014

Unit Letter N, Section 26, Township 17S, Range 33E



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

September XX, 2015

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

> RE: Termination Request ConocoPhillips Philmex 04 (1RP-3210) UL/N sec. 26 T17S R33E API No. 30-025-30394

Ms. Jones:

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

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

The site is located approximately 8.2 miles southeast of Maljamar, New Mexico at UL/N sec. 26 T17S R33E. NM OSE and BLM records indicate that groundwater will likely be encountered at a depth of approximately 162 +/- feet.

On June 26<sup>th</sup>, 2014, CoP discovered a release of 2 barrels of oil and 23 barrels of produced water from a water tank at the site. The PLC and the water transfer pump were down due to a failed transformer in the starter panel, which was hit by lightning the previous night. The transformer was replaced and the system was restarted. A total of 3,880 square feet of battery pad and pasture land was affected by the release. NMOCD was notified of the release on June 27<sup>th</sup>, 2014, and an initial C-141 was submitted to NMOCD for their review (Appendix A).

Basin personnel were on site beginning on June 16<sup>th</sup>, 2014 to visually assess the release. Based on the assessment, a Corrective Action Plan (CAP) was submitted to NMOCD August 8<sup>th</sup>, 2014, and was approved the same day. The CAP stated that the site would be scraped down 6 inches bgs. Once the scrape was completed, a bottom composite of the scrape would be taken to a commercial laboratory for analysis to confirm that chloride, Gasoline Range Organics (GRO), Diesel Range Organics (DRO) and BTEX readings were below regulatory standards.

All excavated soil would be evaluated for use as backfill and any soils that do not meet regulatory standards will be taken to a NMOCD approved facility for disposal. Clean soil would

be imported to the site to replace any soils taken for disposal. The imported soils would be blended with the remaining excavated soil to serve as backfill. A sample of the blended soil would be taken to a commercial laboratory for analysis to confirm that chloride, GRO, DRO and BTEX readings were below regulatory standards. The scrape would be backfilled with the blended soil and contoured to the surrounding location. The disturbed area in the pasture would be seeded with a blend of native vegetation.

CAP activities began June 3<sup>rd,</sup> 2015. The area was scraped to 6 inches bgs and a 5 Pt. Composite was taken and sent to a commercial laboratory for analysis (Figure 1). Laboratory analysis returned a chloride level of 80 mg/kg, a Gasoline Range Organics (GRO) reading of non-detect and a Diesel Range Organics (DRO) reading of 1410 mg/kg (Appendix B). A total of 115 yards of contaminated soil were exported and disposed of at a NMOCD approved facility. Approximately 120 yards of top soil were imported for backfill. A sample of the imported soil was taken and sent to a commercial laboratory for analysis. Laboratory analysis returned a chloride level of non-detect. A request to backfill the site was sent to NMOCD June 10<sup>th</sup>, 2015 and was approved the same day. The site was then backfilled with the clean, imported soil and contoured to the surrounding location.

Photo documentation of the backfilled site can be found in Appendix C.

Given that CoP has completed the work stated in the NMOCD approved CAP, CoP respectfully requests 'remediation termination' and site closure. A final C-141 can be found in Appendix D.

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,

hyle Norma

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

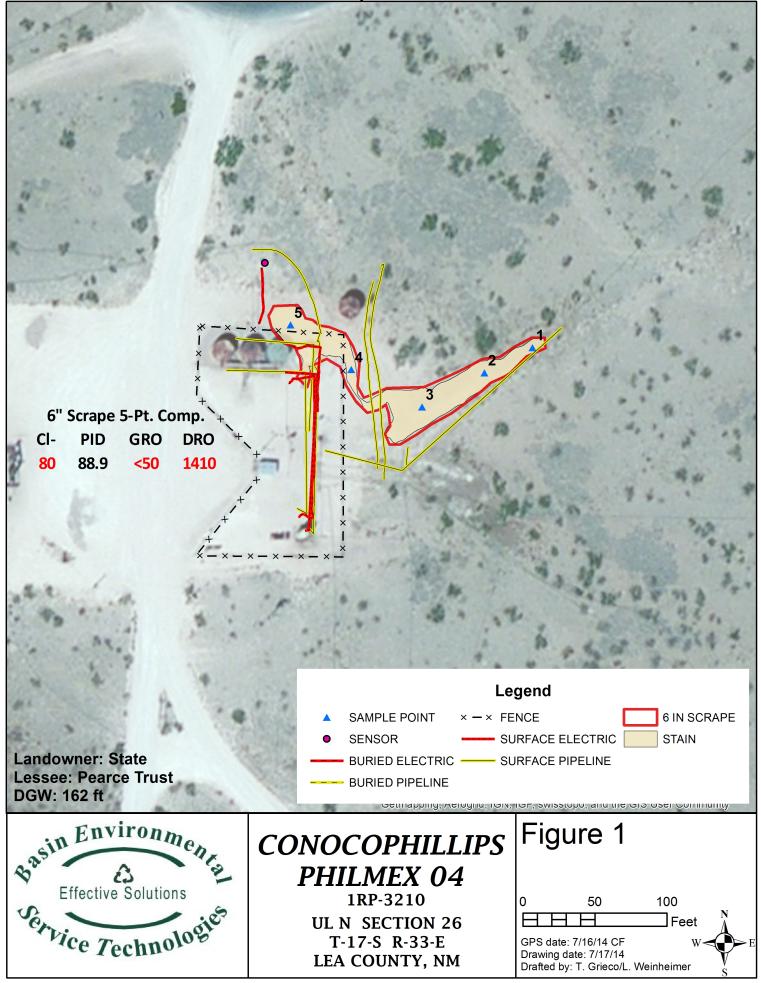
Attachments:

Figure 1 – Scrape Data Appendix A – Initial C-141 Appendix B – Laboratory Analyses Appendix C – Photo Documentation Appendix D – Final C-141

# Figures

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

### Scrape Data



## Appendix A Intial C-141

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

District I Sta 16.25 N. French Dr. Hobbs, NM 88240 Energy Min 81 I-S. First St., Aresia, NM 88210		New Mex and Natura		HOBB	IS OCD		Form C-141 évišed August 8, 2011
District III Off Rio Brazos Read, Aztec, NM 87410 Oil C District IV 1220	South	vation Div St. Franc	is Dr.	AUG	nit 1 20 4	to appropria cordance wi	ate District Office in th 19.15.29 NMAC.
		e, NM 875		10 10 10 10	EIVED	an aga ana any ang	
Release Notific					· ·		
Name of Company: ConocoPhillips		OPERAT	FOR encer Cluff		🛛 Iniți	al Report	Final Report
A.ddress: 29 Vacuum Complex Lane			No. 575-391-31	43			
Facility Name: Philmex 04	I	Facility Typ	e: Oil Well				
Surface Owner NMOCD Mineral Ov	wner N	IMOCD	· · · · · · · · · · · · · · · · · · ·	·····	API No	. 30025303	94
LOCA	TION	OF REI	LEASE				:
Unit LetterSectionTownshipRangeFeet from theN2617S33E660	North/South	South Line	Feet from the 1880	East/W West	est Line	County LEA	
Latitude - 32800239180862 Longitude - 103.6362646872 NATI		OF RELI	EASE				
Type of Release Spill	UNE	Volume of	Release: 25 BBL			Recovered: 1	
Source of Release: Produced Water Tank			our of Occurrence 4:15 a.m.			Hour of Disc 4 9:00 a.m	
Was Immediate Notice Given?	quirëd	If YES, To Geoffrey L	Whom?	·	0/20/201	- 7.00 a.m	· · · · · · · · · · · · · · · · · · ·
By Whom? Spencer Cluff			our: 06/27/2014				
Waš a Watercourse Reached?		IT YES, VO	lume Impacting	the water	course.		11 (Q)
If a Watercourse was Impacted, Describe Fully.*		<i>a</i>			, <u></u>		
On June 6, 2014, at approximately 0415 hrs. MST, an accide received a phone call from the hot oiler operator that the proo- immediately responded to the battery to find that the water ta- wells to isolate the fluid from coming into the produced water the water transfer pump were down due to a failed transform- before. The transformer was replaced, the water transfer pum received by either MSO to alert them of the situation. A tota produce water. The area was measured in three sections 1) 5 in the pasture area. The spill will be remediated according to	duced was ink was er tank, er in th np star il of 25 i0 ft. X	water tank v s over runni The I&E c ted, and the bbls were r 22 ft., 2) 54	vas running over ng. MSO imm lepartment was nel. The transf PLC started in released and 10 4 ft. X 9 ft., 3).	er at the ediately notified ormer fa order to bbls we	Phillmex asked an . I&E de iled due read lev re recove	4 Battery. other MSO termined th to a lightnin els. No ala ared, 2 bbls	The MSO to turn off the nat the PLC and ng storm the night rms or calls were oil and 23 bbls of
Describe Area Affected and Cleanup Action Taken.*						<u></u>	
The area was measured in three sections 1) 50 ft. X 22 ft., 2 area. The spill will be remediated according to NMOCD gui I hereby certify that the information given above is true and comple	delines	5.					
regulations all operators are required to report and/or file certain reh- public health or the environment. The acceptance of a C-141 report should their operations have failed to adequately investigate and ren or the environment. In addition, NMOCD acceptance of a C-141 re federal, state, or local laws and/or regulations:	ease-no L by the nediate	tifications an NMOCD ma contamination	d perform correct arked as "Final R on that pose a thr	tive actio eport" do eat to gro	ns for rele es not reli und water	eases which eve the oper , surface wa	may endanger ator of liability ter, human health
			OIL CON	SERV/	TION	DIVISIO	N
Signature: Spencer A. Cluff		-					
Printed Name: Spencer A. Cluff	Å	pproved by	Environmental S	pecialist:			
Title: LEAD HSE	<u>A</u>	pproval Date	8-4-14	E	opiration i	Date: 10-	7-14
E-mail Address: <b>spencer.a.cluff@conocophillips.com</b>	С	conditions of S	Approvál: Suples reg	me.		Attached.	_
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AS per NMOCD guides. Submit find (-191-by 107-14

## Appendix B Laboratory Analysis

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



June 09, 2015

KYLE NORMAN BASIN ENVIRONMENTAL - HOBBS 419 W. CAIN HOBBS, NM 88240

RE: PHILMEX 04

Enclosed are the results of analyses for samples received by the laboratory on 06/08/15 16:40.

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 - HOBBS KYLE NORMAN 419 W. CAIN HOBBS NM, 88240 Fax To: (575) 393-0293

Received:	06/08/2015	Sampling Date:	06/08/2015
Reported:	06/09/2015	Sampling Type:	Soil
Project Name:	PHILMEX 04	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	COP		

#### Sample ID: 6" SCRAPE 5 PT COMP (H501475-01)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	06/09/2015	ND	432	108	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	<50.0	50.0	06/09/2015	ND	182	91.2	200	1.35	
DRO >C10-C28	1410	50.0	06/09/2015	ND	194	97.2	200	1.68	
Surrogate: 1-Chlorooctane	97.1	% 47.2-15	7						
Surrogate: 1-Chlorooctadecane	141	52.1-17	6						

#### **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

### CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

cursanic@basinenv; sedwards@basinenv

environmental tech:

Cflorer @basinenv

Page 4 of 4

ARDINAL LABORATORIES
----------------------

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603 202 2476 (325) 673-7001 FAX (325)673-7020

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

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Delivered By: (Circle One)

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CHECKED BY: (Initials)

Sample Condition

Cool Intact Yes Yes No No



September 04, 2015

KYLE NORMAN BASIN ENVIRONMENTAL - HOBBS 419 W. CAIN HOBBS, NM 88240

**RE: PHILMEX 04** 

Enclosed are the results of analyses for samples received by the laboratory on 08/31/15 15:46.

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>.

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Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
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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 - HOBBS KYLE NORMAN 419 W. CAIN HOBBS NM, 88240 Fax To: (575) 393-0293

08/31/2015	
09/04/2015	
PHILMEX 04	
NONE GIVEN	
COP	
	09/04/2015 PHILMEX 04 NONE GIVEN

Sampling Date:08/31/2015Sampling Type:SoilSampling Condition:\*\* (See Notes)Sample Received By:Judy Garcia

#### Sample ID: IMPORTED SOIL (H502314-01)

Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	09/03/2015	ND	432	108	400	0.00	

#### **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

#### Cardinal Laboratories

#### \*=Accredited Analyte

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager

#### CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page 4 of 4

ARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240	2111 Beechwood, Abilene, TX 79603

(505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325)673-7020

Company Name: ConocoPhillips										BI	LL TO	)					AN	IAL	YSIS	REC	UES	ST		
Project Manager: Kyle Norman							P	.0.	#:							Τ					T			
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Sampler - UPS - Bus - Other:	Yes Yes An	environmental tech: @basinenv
	No No NO	

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

### Appendix C Photo Documentation

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

### **ConocoPhillips Philmex 04**

Unit Letter N, Section 26, T17S, R33E



Initial release area, facing northeast

7/16/14



Initial release area, facing southeast 7/16/14



Initial release area, facing southwest

7/16/14



Beginning 6 inch scrape, facing north

6/5/15



Exporting soil, facing north

6/5/15



Backfilling scrape, facing southeast

6/12/15



Importing soil, facing east

6/12/15



Site completed, facing northeast

6/12/15



Site completed, facing southwest

6/12/15



Site completed, facing north

6/12/15

## Appendix D Final C-141

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

Form C-141 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.

1220 S. St. Fran	cis Dr., Santa	a Fe, NM 8750:	5	Sa		'e, NM 875						
			Rel	ease Notific				ction				
										al Report		Final Donor
Name of Co	mpany: (	ConocoPhill	OPERATOR Initial Report Final Report									
		n Complex I	Telephone No.									
Facility Nat					Facility Type Oil Well							
Surface Ow	ner: NM	OCD.	·····	Minoral	)	NIMOOD	· · · · · · · · · · · · · · · · · · ·		ADINI	2002520	204	
Surface Ow				willierai C	Jwner:	NMOCD			API NO	. 3002530	394	
			1			N OF RE	·····					
Unit Letter	Section	Township	Range	Feet from the	North	/South Line	Feet from the	East/V	Vest Line	County		
N	N 26 17S 33E 660 So			South	n 1880		West		LEA			
			Lat	itudo 22 80022	10004	O I an aiter d						
			Lat	itude 32.800239				8/2//				
Type of Rele	ase: Spill		COF RELEASE Volume of Release: 25 BBLS Volume Recovered: 10 BBLS					C				
Source of Release: Water Tank										nd Hour of Discovery		
										2014 9:00 am		
Was Immediate Notice Given?						If YES, To Whom?						
☐ Yes ⊠ No ☐ Not Required						Geoffrey Leking						
By Whom? J				Date and Hour: 06/27/2014 4:15 pm								
Was a Watercourse Reached?						If YES, Volume Impacting the Watercourse.						
Yes X No												
If a Watercou	irse was Im	pacted, Descr	ibe Fully.'	k						·····		
transfer pump was replaced, levels. No al oil and 23 bb is in the past. Describe Are laboratory for Range Organ Approximate analysis. Lab surrounding I I hereby certi regulations al public health should their c or the enviror	o were down the water t arms or call ls of produc rearea. The a Affected a r analysis. I ics (DRO) r ly 120 yards poratory ana ocation. fy that the i l operators or the envir operations homent. In a	a due to a fail- ransfer pump s were receiv- e water. The te spill will be and Cleanup A Laboratory an reading of 141 s of base cour lysis returned nformation gi are required to ronment. The ave failed to a	ed transfor starter par ed by either area was re- remediate Action Tak alysis retu 0 mg/kg. se were in a chloride ven above o report ar acceptance udequately OCD accep	e produced water rmer in the starter hel. The transforr er MSO to alert the measured in three ed according to N cen.* The area v urned a chloride le A total of 115 ya apported for backfi e level of non-det is true and comp ad/or file certain r investigate and r tance of a C-141	panel. ner was section <u>MOCD</u> was scra evel of 8 rds of c ll. A sa ect. Th lete to t elease r ort by th	The transform replaced, the streplaced, the streplaced, the streplaced, the streplaced, the streplaced, the guidelines. upped to 6 inche 30 mg/kg, a G contaminated s ample of the in e site was bac the best of my potifications a me NMOCD m te contaminated	her failed due to a water transfer put A total of 25 bbls 2 ft., 2) 54 ft. X 9 es bgs and a 5 Pt. asoline Range Or oil were exported nported soil was kfilled with the cl knowledge and u nd perform correc arked as "Final R on that pose a thr	a lightnir ump start were relo 9 ft., 3) 1 Compos ganics (( 1 and dis taken an lean, imp inderstan tive acti eport" di	ng storm the ed, and the eased and 1 38 ft. X 46 ite was tak GRO) readi posed of at d sent to a ported soil a d that purs ons for rele oes not reli	e night befo PLC starter 0 bbls were i ft., all 2 ind en and sent ng of non-d a NMOCD commercial and contour uant to NM cases which eve the ope:	re. The d in ord recover ches de to a con- etect ar approv laborar laborar OCD rn may er rator of the her her	e transformer ler to read cred, 2 bbls ep. The spill mmercial and a Diesel ved facility. tory for te ules and adanger liability man health
Signature: See Aller						OIL CONSERVATION DIVISION						
Printed Name: SEAN ROBENSON Title: OPELATIONS SUPERVISEL E-mail Address: Strabin C Cy. Com						Approved by Environmental Specialist:						
Title:	HELAT I	ions fr	PEOUS	6×		Approval Dat	e: 01/06/2016	I	Expiration I	Date: ///		·····
		sin C	•			Conditions of	Approval:			Attached		
Date: "/	flis .		Phone:	575-390-88	75	111				1RP 3210		

\* Attach Additional Sheets If Necessary