

REVIEWED

By Kellie Jones at 10:35 am, Jan 13, 2016

APPROVED

By Kellie Jones at 10:35 am, Jan 13, 2016



1. Ensure BLM approval.

CONOCOPHILLIPS

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

Warren Unit #17 (1RP-3134)

Termination Request

API No. 30-025-07878

Release Date: June 25th, 2014

Unit Letter I, Section 33, Township 20S, Range 38E



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

January 11, 2016

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 Warren Unit #17 (1RP-3134)
UL/I sec. 33 T20S R38E
API No. 30-025-07878**

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 6.2 miles north of Eunice, New Mexico at UL/I sec. 33 T20S R38E. NM OSE, BLM and Basin installed monitor well records indicate that groundwater will likely be encountered at a depth of approximately 71 +/- feet.

On June 25th, 2014, an injection line released 90 barrels of produced water over 1,627 sq ft of pasture. The line was isolated and a vacuum truck was called to the site. A total of 20 barrels of fluid were recovered. NMOCD was notified of the release on June 25th, 2014, and an initial C-141 was submitted for their approval (Appendix A). NMOCD approved the initial C-141 on July 2nd, 2014.

Basin personnel were on site July 8th, 2014, to assess the release. The release was mapped and two verticals were installed. Vertical 1 was installed to 6 inches bgs and Vertical 2 was installed to 1 ft bgs. Samples from each vertical were taken to a commercial laboratory for analysis. Laboratory analysis confirmed chloride and hydrocarbon levels below regulatory standards in Vertical 1. Laboratory analysis of Vertical 2 also confirmed chloride and Gasoline Range Organics (GRO) below regulatory standards; however, Diesel Range Organics (DRO) readings were elevated. CoP excavated the site to 4 ft bgs in order to repair the damaged line, excavating approximately 200 cubic yards of contaminated soil. Once the excavation was completed, wall and bottom samples were sent to a commercial laboratory for analysis. Laboratory analysis confirmed low chloride and hydrocarbon levels.

Based on the laboratory analysis, a Corrective Action Plan (CAP) was submitted to NMOCD and BLM April 2nd, 2015. BLM approved the CAP the same day and NMOCD gave approval April 6th, 2015. The CAP stated that the area around Vertical 2 would be excavated to 1ft bgs and a bottom composite would be taken to a commercial laboratory to confirm that chloride and hydrocarbon readings were below regulatory standards. All excavated soils would be taken to a NMOCD approved facility for disposal. Clean soil would be imported to the site to serve as backfill. A sample of the imported soil would be taken to a commercial laboratory to confirm that the chloride reading was below regulatory standards. The excavation would be backfilled with the clean, imported soil and seeded with a blend of native vegetation.

CAP activities began May 14th, 2015. The area around Vertical 2 was excavated to 1 ft bgs and a bottom composite sample was collected from the base of the excavation and sent to a commercial laboratory for analysis (Figure 1). Laboratory analysis returned chloride, GRO, DRO and BTEX values of non-detect (Appendix B). Approximately 120 yards of contaminated top soil were exported and disposed of at a NMOCD approved facility. Approximately 130 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. The site was 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,

A handwritten signature in black ink that reads "Kyle Norman" followed by a horizontal line.

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

Attachments:

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

Figures

Excavation Data

Vertical 1

	CI-	PID	GRO	DRO
SS	192	0.2	<10	33.2
6"	<16	0.2	<10	<10

Vertical 2

	CI-	PID	GRO	DRO
SS	160	0.3	<10	988
6"	64	0.4	<10	129
1'	160	0.03	<50	478

Wall Samples

	CI-	PID	GRO	DRO
West Wall North	91	0.3		
West Wall Center	<16	0.2	<10	<10
West Wall South	89	0.2		
South Wall	<16	0.2	<10	<10
East Wall North	91	0.2		
East Wall Center	<16	0.2	<10	<10
East Wall South	86	0.1		

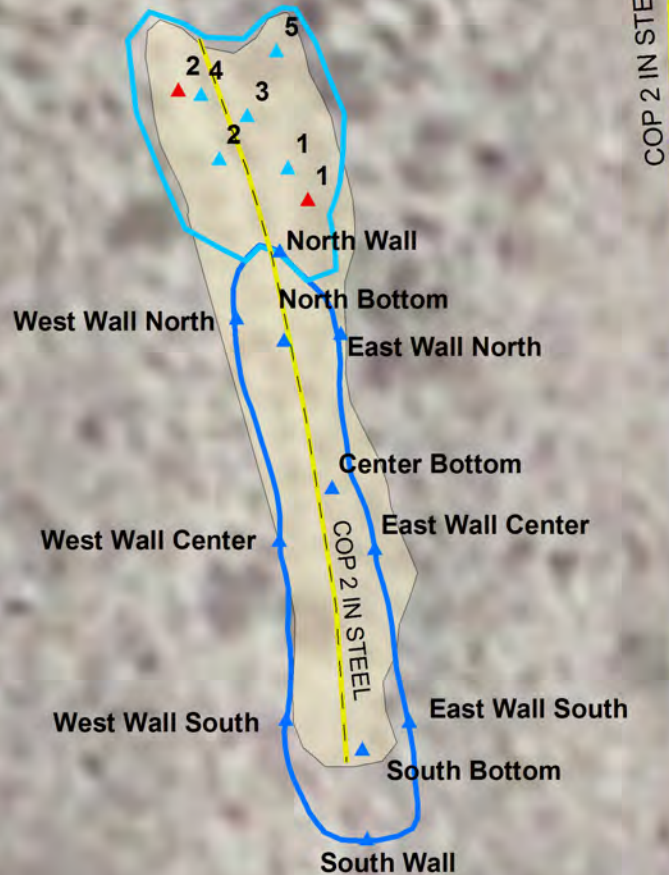
3 Pt. Bottom Comp.

Cl-	PID	GRO	DRO
<16	0.4	<10	<10

5 Pt. Composite










	Cl-	GRO	DRO	B	T	E	X	BTEX
1'	<16	<10	<10	<0.05	<0.05	<0.05	<0.15	<0.3

Landowner: Farm and Ranch Limited Partnership
DGW: 71 FT



Field data
Lab data

Legend

-  SAMPLE POINT - 1 FT EXCAVATION
-  VERTICALS
-  SAMPLE POINT - 4 FT EXCAVATION
-  BURIED PIPELINE
-  ROAD EDGE
-  SURFACE PIPELINE
-  1 FT EXCAVATION
-  4 FT EXCAVATION
-  STAIN- 1,627 SQ FT

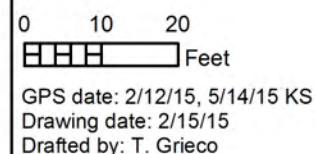
Source: Esri, DigitalGlobe, GeoEye, AeroGRID, IGN, and the GIS User Community



**CONOCOPHILLIPS
WARREN UNIT #17**

1RP-3134
UL/I SECTION 33
T-20-S R-38-E
LEA COUNTY, NM

Figure 1



Appendix A

Intial C-141

Basin Environmental Service Technologies
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 Mexico **HOBBS OCD**
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 8, 2011

JUN 26 2014

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

RECEIVED

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: ConocoPhillips	Contact: Jose A Zepeda	
Address: 1410 N West County Road	Telephone No. 575-391-3165	
Facility Name: Warren Unit #17	Facility Type: Injection Line	
Surface Owner: Fed LSE	Mineral Owner: N/A	API No. LC-031695B

LOCATION OF RELEASE

30-02S-078+20

Unit Letter I	Section 33	Township 20S	Range 38E	Feet from the	North/South Line	Feet from the	East/West Line	County Lea
-------------------------	----------------------	------------------------	---------------------	---------------	------------------	---------------	----------------	----------------------

Latitude _____ Longitude _____

NATURE OF RELEASE

Type of Release: Produce Water	Volume of Release: 90 BBLs	Volume Recovered: 20 BBLs
Source of Release: Pipeline	Date and Hour of Occurrence 06/25/2014 ~ 1400 pm	Date and Hour of Discovery 06/23/2014 ~ 1430 pm
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Geoffrey Leking	
By Whom? Jose A Zepeda	Date and Hour: 06/25/2014 ~ 1620 pm Email	
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.*

N/A

Depth to gH₂O ~ 50'

Describe Cause of Problem and Remedial Action Taken.*

ENV - Agency Reportable - MCBU - Permian - SENM - Hobbs - Warren Unit #17 Injection Line + ~ 90 bbl. of Produce Water - RR2. On June 25, 2014 @ ~1430 am @ the Warren Unit #17 Injection Line, there was an accidental release of ~ 90 bbl. of Produce Water. COPC employee was contacted of a pipeline leak south of the Warren Unit #17. Upon arrival on location COPC employee noticed that the line was the injection line for Warren Unit #17 located south of Warren Unit #17. COPC employee isolated the line, and then contacted vacuum truck to pick up spill; vacuum truck picked up 20 bbl. of produced water, COPC employee then called Supervisor about the leak. A work order will be generated for cleanup and repairs. The spill site will be remediated in accordance with COPC and NMOCD guidelines. An Investigation into the cause of the incident is ongoing.

Describe Area Affected and Cleanup Action Taken.*

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: JOSE A ZEPEDA		OIL CONSERVATION DIVISION	
Printed Name: Jose A Zepeda		Approved by Environmental Specialist:	
Title: LEAD HSE	Approval Date: 7-2-2014	Expiration Date: 9-5-14	
E-mail Address: Jose. A. Zepeda@conocophillips.com	Conditions of Approval: Site Samples required. Deliver & remediate to NMOCD guide		Attached <input type="checkbox"/> 7-14-3134
Date: 06/25/2014	Phone: 575-391-3158		

* Attach Additional Sheets If Necessary

Submit final C-141 by 9-5-14

orig 217812
HTO 1418349165
P 70 1418349480

JUL 02 2014

Appendix B

Laboratory Analysis

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



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

May 15, 2015

KYLE NORMAN

BASIN ENVIRONMENTAL - HOBBS

419 W. CAIN

HOBBS, NM 88240

RE: WARREN UNIT #17

Enclosed are the results of analyses for samples received by the laboratory on 05/14/15 16:05.

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,

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: 05/14/2015
Reported: 05/15/2015
Project Name: WARREN UNIT #17
Project Number: NONE GIVEN
Project Location: CONOCOPHILLIPS

Sampling Date: 05/14/2015
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: 5 PT. COMP 1' EXC. (H501246-01)

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/15/2015	ND	1.63	81.4	2.00	0.121	
Toluene*	<0.050	0.050	05/15/2015	ND	1.74	86.8	2.00	2.30	
Ethylbenzene*	<0.050	0.050	05/15/2015	ND	1.63	81.6	2.00	0.161	
Total Xylenes*	<0.150	0.150	05/15/2015	ND	4.80	79.9	6.00	0.171	
Total BTEX	<0.300	0.300	05/15/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 110 % 61-154

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	05/15/2015	ND	400	100	400	3.92		

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	05/15/2015	ND	175	87.4	200	0.307	
DRO >C10-C28	<10.0	10.0	05/15/2015	ND	203	102	200	6.78	

Surrogate: 1-Chlorooctane 101 % 47.2-157

Surrogate: 1-Chlorooctadecane 120 % 52.1-176

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 whatsoever 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, 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 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.



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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Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page 4 of 4

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Relinquished By:		Date:	Received By:	Phone Result:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Phone #:
K/Lc Schwaib		5-14-15	Jodi Henson	Fax Result:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Fax #:
Relinquished By:		Time:		REMARKS:		
		3/14/15		email results:		
		Date:	Received By:	hconder@basinenv.com; knorman@basinenv.com;		
		4.05		jkamplain@basinenv; lflores@basinenv; lweinheimer@basinenv;		
		Time:		cursanic@basinenv; sedwards@basinenv		
Delivered By: (Circle One)				environmental tech: K Schwaib		
Sampler - UPS - Bus - Other:		4.20	Sample Condition	@basinenv		
			Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/>			
			<input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> Yes			
			<input type="checkbox"/> No <input type="checkbox"/> No			
			CHECKED BY:			
			(Initials)			

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

#54

September 04, 2015

KYLE NORMAN

BASIN ENVIRONMENTAL - HOBBS

419 W. CAIN

HOBBS, NM 88240

RE: WARREN UNIT #17

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 www.tceq.texas.gov/field/qa/lab_accred_certif.html.

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Lab Director/Quality Manager

Analytical Results For:

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

Received: 08/31/2015
Reported: 09/04/2015
Project Name: WARREN UNIT #17
Project Number: NONE GIVEN
Project Location: CONOCOPHILLIPS

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

Sample ID: IMPORTED SOIL (H502313-01)**Chloride, SM4500Cl-B****mg/kg****Analyzed 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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Celey D. Keene, Lab Director/Quality Manager

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-	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

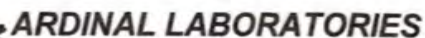
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*=Accredited Analyte

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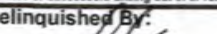
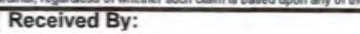

Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page 4 of 4

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Relinquished By: 		Date: 8/31/15 Time:		Received By:		Phone Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Add'l Phone #:	
Relinquished By:		Date: 8/31/15 Time: 15:46		Received By: 		Fax Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Add'l Fax #:	
Delivered By: (Circle One)		23.2°C		Sample Condition: Cool <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Intact <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		CHECKED BY: (Initials) 	
Sampler - UPS - Bus - Other:						REMARKS: email results: hconder@basinenv.com; knorman@basinenv.com; jkamplain@basinenv; lflores@basinenv; lweinheimer@basinenv; cursanic@basinenv; sedwards@basinenv environmental tech: @basinenv	

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

#54

Appendix C

Photo Documentation

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

ConocoPhillips Warren Unit #17

Unit Letter I, Section 33, T20S, R38E



Initial release area, facing southeast

5/8/14



Initial release area, facing south

5/8/14



Excavating release, facing southwest

5/14/15



Exporting soil, facing south

5/18/15



Completed excavation, facing south

5/18/15



Backfilled excavation, facing south

5/18/15



Hand seeding location, facing south

6/19/15



Completed site, facing north

6/19/15

Appendix D

Final C-141

Basin Environmental Service Technologies
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
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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
Address: 1410 West County Road	Telephone No.
Facility Name: Warren Unit #17	Facility Type Injection Line

Surface Owner Fed LSE	Mineral Owner N/A	API No. LC-031695B
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LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
J	33	20S	38E					LEA

Latitude 32.527075 Longitude -103.147030

NATURE OF RELEASE

Type of Release: Produce Water	Volume of Release: 90 BBLs	Volume Recovered: 20 BBLs
Source of Release Pipeline	Date and Hour of Occurrence 06/25/2014 2:00 pm	Date and Hour of Discovery 06/25/2014 2:30 pm
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? Jose A Zepeda	Date and Hour: 06/25/2014 4:20 pm	
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- MCBU- Permian-SENM-Hobbs-Warren Unit #17 Injection Line + ~90 bbl. of produced water - RR2. On June 25, 2014 @ ~1430 am @ the Warren Unit #17 Injection Line, there was an accidental release of ~90 bbl. of produce water. COPC employee was contacted of a pipeline leak south of Warren Unit #17. Upon arrival on location COPC employee noticed that the line was the injection line for Warren Unit #17 located south of the Warren Unit #17. COPC employee isolated the line and then contacted vacuum truck to pick up spill; vacuum truck picked up 20 bbl. of produced water, COPC employee then called Supervisor about the leak. A work order will be generated for cleanup and repairs. The spill site will be remediated in accordance with COPC and NMOCD guideline. An investigation into the cause of the incident is ongoing.

Describe Area Affected and Cleanup Action Taken.* ☐ The area around Vertical 2 was excavated to 1 ft bgs and a bottom composite sample was collected from the base of the excavation and sent to a commercial laboratory for analysis. Laboratory analysis returned chloride, GRO, DRO and BTEX values of non-detect. Approximately 120 yards of contaminated top soil were exported and disposed of at a NMOCD approved facility. Approximately 130 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. The site was backfilled with the clean, imported soil and contoured to the surrounding location

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.

OIL CONSERVATION DIVISION

Signature:

Printed Name:

Approved by Environmental Specialist:

Title:

Approval Date:

Expiration Date:

E-mail Address:

Conditions of Approval:

Attached ☐

Date:

Phone:

* Attach Additional Sheets If Necessary