

### RECEIVED

By JKeyes at 1:31 pm, Jan 26, 2016

#### **APPROVED**

By JKeyes at 1:31 pm, Jan 26, 2016

## **CONOCOPHILLIPS**

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

# SEMU Permian #34 1RP-3270

# Termination Request

API No. 30-025-07820

Release Date: July 12<sup>th</sup>, 2014

Unit Letter J, Section 19, Township 20S, Range 38E



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

#### **January 26, 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 SEMU Permian #34 (1RP-3270) UL/J sec. 19 T20S R38E API No. 30-025-07820

Ms. Jones:

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

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

The site is located approximately 6.5 miles southeast of Monument, New Mexico at UL/J sec. 19 T20S R38E. NM OSE and BLM records indicate that groundwater will likely be encountered at a depth of approximately 63 +/- feet.

On July 12<sup>th</sup>, 2014, CoP discovered a tubing pressure switch had been removed exposing an open ½ inch ball valve with a broken seal, which released 3 barrels of oil and 4 barrels of produced water over 4,240 square feet of lease pad. The pressure switch was reinstalled, the ball valve was sealed, and the well was returned to service. A vacuum truck was called to the site and recovered 1 barrel of produced water and 1 barrel of oil. NMOCD and BLM were notified of the release on July 16<sup>th</sup>, 2014 and an initial C-141 was sent to both parties for their approval (Appendix A).

Basin personnel were on site to visually assess the release on August 18<sup>th</sup>, 2014. The release was mapped and photographed. Based on the visual assessment, a Corrective Action Plan (CAP) was submitted to BLM and NMOCD April 2<sup>nd</sup>, 2015. BLM approved the report the same day and NMOCD gave their approval April 3<sup>rd</sup>, 2015. The CAP stated that the release would be scraped down 6 inches bgs. Once the scrape was completed, a composite sample from the bottom of the scrape would be taken and field tested for chlorides and organic vapors. If the field data indicated that the composite would not achieve chloride, Gasoline Range Organics (GRO), Diesel Range Organics (DRO) and BTEX readings below regulatory standards, the scrape would

be deepened until field testing indicated that all constituents from the bottom composite would be below regulatory standards. The bottom composite would then be taken to a commercial laboratory to confirm that chloride, GRO, DRO and BTEX readings were below regulatory standards.

All excavated soils would be evaluated for use as backfill and any soils that do not meet regulatory standards would be taken to a NMOCD approved facility for disposal. Clean caliche would be imported to the site to replace any soils taken to disposal. The clean caliche would be blended with the remaining excavated soil, and a sample of the blended soil would be taken to a commercial laboratory 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.

CAP activities began July 7<sup>th</sup>, 2015. The release area was scraped to 1 ft bgs. A 5 point bottom composite was collected from the base of the scrape and sent to a commercial laboratory for analysis. Laboratory analysis returned a chloride value of 112 mg/kg, a GRO value of <10 mg/kg and a DRO value of 12 mg/kg (Figure 1). A total of 140 cubic yards of contaminated soil were exported and disposed of at a NMOCD approved facility. A total of 140 cubic yards of caliche were imported for backfill. A sample of the imported caliche was taken and sent to a commercial laboratory for analysis. Laboratory analysis returned chloride, GRO and DRO levels of non-detect. The site was backfilled with the clean, imported caliche and contoured to the surrounding location.

Photo documentation of the field activities 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 call me if you have any questions or wish to discuss the site.

Sincerely,

Kyle Norman

hyle Norma

Project Lead

Basin Environmental Service Technologies

(575) 942-8542

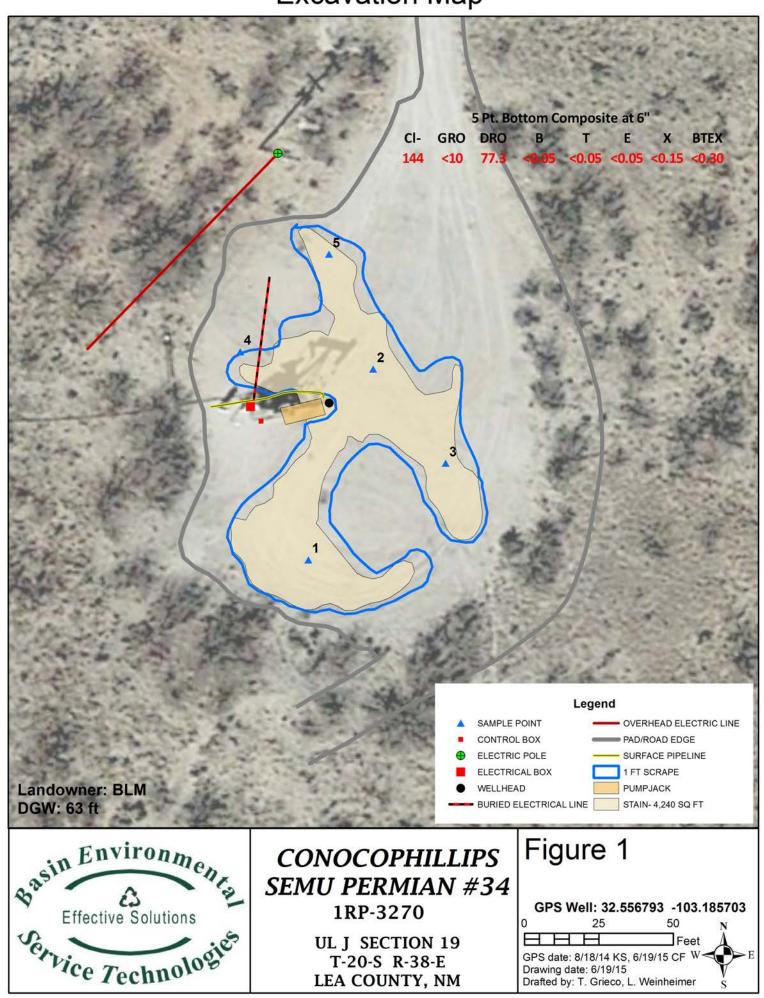
Attachments:

Figure 1 – Excavation Map

Appendix A – Initial C-141 Appendix B – Laboratory Analysis Appendix C – Photo Documentation Appendix D – Final C-141

# Figures

## **Excavation Map**



# Appendix A Initial C-141

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 Fc, NM 87505

#### State of New Mexico Energy Minerals and Natural Resources

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505

### HOBBS OCD

Form C-141 Revised August 8, 2011

AUG 2 6 2014 Submit 6 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

RECEIVED

			Rel	ease Notifica	atioi	n and Co	rrective A	ction	1							
						OPERA'	ror	al Report	ПБ	inal Report						
Name of Co	mpany: C	onocoPhilli	os !			Contact: David May										
Address: 14	10 N Wes	t County Ro	oad			Telephone 1	No. 575-391-310	06 .								
Facility Nar	ne: SEMI	U Permian #	34			Facility Typ	e: Oil Well									
Surface Ow	nov D1 M		·	Mineral O		State A DI NI 2002507920										
Surface Ow	Her, BLIVE			Milheral O	wner:	er: State API No3002507820										
				LOCA	TIOI	OF RE	LEASE									
Unit Letter	Section	Township	Range	1		South Line	Feet from the	West Line	County							
J	19	19   20S   38E   980   South   1980   East   LEA														
Latitude 32.5567767041633 Longitude 103.1856511223 NATURE OF RELEASE																
Type of Relea	ase: Spill			•		Volume of	Release: 7 BBLS	}	Volume F	Recovered: 2	BBLS					
Source of Rel	ease: Press	ure switch					lour of Occurrenc	е	Date and	Hour of Disc	overy					
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By Whom? D	avid May	·			1	Date and E	our: 7/16/2014 2:									
Was a Watero		hed?					lume Impacting t		ercourse.							
			Yes 🗵	No												
If a Watercourse was Impacted, Describe Fully.*																
N/A																
Describe Cau ENV - Agend occurred at the	cy Reportal	ole - 4 BPW &	3 BO - S	n Taken.* EEMU Permian #34	- RR	II - MCBU -	Hobbs: On Saturo	day July	12, 2014 (	@ 0845 Hrs. N	MST, a ı	elease				
release of 4 B	PW and 3 I	30, all on cali	che pad v	e tubing pressure s vith 1 BPW & 1 BC eturned well to serv	recov	ered. MSO n	otified supervisor	and cal	lled for Vac	truck. MSO	isolated	well, re-				
Describe Area . Spill area wa				ren.* will be remediated	l accore	ding to BLM	and NMOCD gui	delines.		-						
regulations al public health should their o	l operators or the envir perations had ment. In a	are required to onment. The ave failed to a ddition, NMO	report ar acceptance dequately CD accep	is true and comple ad/or file certain rel e of a C-141 report investigate and rel tance of a C-141 re	ease no t by the nediate	otifications are NMOCD m contaminati	nd perform correct rearked as "Final Rear on that pose a threet the operator of r	tive acti eport" d eat to gr esponsi	ions for rele loes not reli round water ibility for co	eases which never the operations, surface water ompliance with	nay ends tor of liser, hume th any o	inger ability in health				
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Signature:	Aniel	Meny						=								
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Printed Name	: David Ma	у				Appinated by	Lansaronnichtar Sp	peciansi								
Title: LEAD I	HSE					Approval Dat	e: <b>8-26-/4</b>	]	Expiration 1	Date: 6-3	1 <del>7-</del> /9	•				
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# Appendix B Laboratory Analysis



June 24, 2015

KYLE NORMAN

BASIN ENVIRONMENTAL - HOBBS

419 W. CAIN

HOBBS, NM 88240

RE: SEMU PERMIAN #34

Enclosed are the results of analyses for samples received by the laboratory on 06/23/15 9:45.

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">www.tceq.texas.gov/field/ga/lab</a> accred certif.html.

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.

Celey D. Keine

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: 06/23/2015 Sampling Date: 06/22/2015

Reported: 06/24/2015 Sampling Type: Soil

Project Name: SEMU PERMIAN #34 Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Jodi Henson

Project Location: CONOCOPHILLIPS

#### Sample ID: 5 PT. BOTTOM COMP @ 6" (H501610-01)

DTEV 0021D

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	06/23/2015	ND	1.92	96.0	2.00	1.67	
Toluene*	<0.050	0.050	06/23/2015	ND	1.92	96.1	2.00	2.68	
Ethylbenzene*	< 0.050	0.050	06/23/2015	ND	2.04	102	2.00	2.61	
Total Xylenes*	<0.150	0.150	06/23/2015	ND	5.67	94.4	6.00	2.49	
Total BTEX	<0.300	0.300	06/23/2015	ND					
Surrogate: 4-Bromofluorobenzene (PID	111 %	61-154	!						
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	06/24/2015	ND	384	96.0	400	11.8	
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	06/23/2015	ND	181	90.5	200	1.80	
DRO >C10-C28	77.3	10.0	06/23/2015	ND	190	95.2	200	3.04	
Surrogate: 1-Chlorooctane	104 %	6 47.2-15	7						

Surrogate: 1-Chlorooctane 104 % 47.2-157
Surrogate: 1-Chlorooctadecane 125 % 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 whistoever 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 related only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keine



#### **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. Freene



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

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	BILL TO	ANALYSIS REQUEST
Project Manager: Kyle Norman	P.O. #:	
Address: 419 W Cain	Company: Basin	
City: Hobbs State: NM Zip: 88240	Attn:	]         [0]
Phone #: 575-393-2967 Fax #: 575-393-0293	Address: 419 W Cain	
Project #: Project Owner:	City: Hobbs	alorides H 8015 M STEX Ass TPH Cations/Anions TDS
Project Name: Co P	State: NM Zip: 88240	Chlorides The South No. 12 August Cations/ TDS TDS
Project Location: SEMU Permian #34	Phone #: 575-393-2967	hloride Handel
Sampler Name: Chris Flores	Fax #: 575-393-0293	
FOR LAB USE ONLY MATRIX	PRESERV. SAMPLING	- 등 등 등 등 등 등 등 등 등 등 등 등 등 등 등 등 등 등 등
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1 5 Point Bolton Composite CG' (1)	J 6/22/15 3:30A	4 X X X
PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising whether based in con analyses. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing service. In no event shall cardinal be liable for incidential or consequential damages, including without partialistic, business interruptic affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, reggrdless of whether such of	g and received by Cardinal within 30 days after completion ons, loss of use, or loss of profits incurred by client, its subs	of the applicable idlaries

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11	6-23-2015	Ina. M		Fax Result:	☐ Yes	☑ No	Add'l Fax #:
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Delivered By: (Circle One)		Sample Condition	CHECKED BY:				vards@basinenv_
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<sup>†</sup> Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476





July 02, 2015

KYLE NORMAN

BASIN ENVIRONMENTAL - HOBBS

419 W. CAIN

HOBBS, NM 88240

RE: SEMU PERMIAN #34

Enclosed are the results of analyses for samples received by the laboratory on 06/30/15 16:25.

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">www.tceq.texas.gov/field/ga/lab</a> accred certif.html.

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.

Celey D. Keine

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: 06/30/2015 Sampling Date: 06/30/2015

Reported: 07/02/2015 Sampling Type: Soil

Project Name: SEMU PERMIAN #34 Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Jodi Henson

Project Location: CONOCOPHILLIPS

#### Sample ID: IMPORTED CALICHE (H501685-01)

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	07/01/2015	ND	416	104	400	7.41	
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	07/01/2015	ND	161	80.6	200	3.50	
DRO >C10-C28	<10.0	10.0	07/01/2015	ND	177	88.6	200	8.99	
Surrogate: 1-Chlorooctane	102	% 47.2-15	7						
Surrogate: 1-Chlorooctadecane	120	% 52.1-17	6						

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 whistoever 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 related only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keine



#### **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. Freene

### ARDINAL LABORATORIES

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

(505) 393-2326 FAX (505) 393-2476 (325) 673-7001 ompany Name: ConocoPhillips							T	BILL TO ANALYSIS REQUEST										_					
							7	P.O. #:															
roject Manager:	Kyle Norman						-	Company: Basin					- 1	- 1		- 1	w				1 1		
ddress: 419 V	V Cain						-19	com	pan	y: E	sasın		-1	- 1	- 1			۳					
ity: Hobbs	State: NM	Zip	: 88	240			- /	Attn:					_	- 1			- 1	١ڪا					
Phone #: 575-393-2967						1	Addı	ddress: 419		9 W Ca	in		- 1	_		- 1	Ā						
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<sup>†</sup> Cardinal cannot accept verbal changes. Please fax written changes to 505-393-247



# Appendix C Photo Documentation

### **ConocoPhillips SEMU Permian #34**

Unit Letter J, Section 19, T20S, R38E



Initial release area, facing southwest

8/18/14



Shoveling release, facing southeast

6/19/15



Initial release area, facing southwest

8/18/14



Scraping release, facing northwest

6/19/15



Exporting soil, facing south

6/19/15



Backfilling scrape, facing north

6/30/15



Backfilling scrape, facing northwest

6/30/15



Completed site, facing northwest

6/30/15







Completed site, facing southwest 6/30/15

# Appendix D Final C-141

<u>District I</u>
1625 N. French Dr., Hobbs, NM 88240
<u>District II</u>
811 S. First St., Artesia, NM 88210
<u>District III</u>
1000 Rio Brazos Road, Aztec, NM 87410
<u>District IV</u>
1220 S. St. Francis Dr., Santa Fe, NM 87505

#### State of New Mexico Energy Minerals and Natural Resources

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.

Release Notification and Corrective Action															
						OPERATOR Initial Report   Final l									
Name of Co	mpany: (	ConocoPhilli	ips			Contact									
Address: 1						Telephone 1									
Facility Nan	ne: SEM	U Permian #	<i>‡</i> 34		I	Facility Type Tank Battery									
Surface Own	ner: BLN	Л		Mineral (	)wner: S	State	NOTE PARTIES TO		API No	. 30-025-07820					
				LOCA	ATION	OF REI	LEASE								
Unit Letter	Section	Township	Range	Feet from the		South Line	Feet from the	East/V	West Line	County					
J	19	20S	38E	980	South		1980		LEA						
Latitude 32.5567767041633 Longitude 103.1856511223															
NATURE OF RELEASE															
Type of Release: Spill Volume of Release: 7 BBLS Volume Recovered: 2 BBLS															
Source of Rel	lease Press	sure switch				Date and H 7/12/2014	lour of Occurrence	e	Date and Same	Hour of Discovery					
Was Immedia	ate Notice C	Given?				If YES, To		<u></u>	Same						
			Yes _	No Not R	equired	Solomon F	Iughes								
By Whom? I							Iour: 7/16/2014 2								
Was a Watero	course Reac	hed?	Yes 🗵	l No		If YES, Vo	lume Impacting t	the Wate	ercourse.						
TE - XV-t	Tura	nastad Dasan													
ii a watercou	If a Watercourse was Impacted, Describe Fully.*														
ENV- Agenc	Describe Cause of Problem and Remedial Action Taken.* ENV- Agency Reportable- 4 BPW & 3 BO- SEMU Permian #34- RR II- MCBU- Hobbs: On Saturday July 12, 2014 @ 0845 Hrs. MST, a release occurred at the SEMU Permian well #34.														
release of 4P	W and 3 BC	), all on calich	ne pad wit	h 1 BPW & 1 BO	recovere	ed. MSO not	ified supervisor a	ınd calle	ed for Vac t	vith seal broken) causing a ruck. MSO isolated well, re- ording to BLM and NMOCD					
laboratory for mg/kg. A to yards of cali	area was sor analysis otal of 140 che were in analysis re	scraped to 1  Laborator cubic yards imported for turned chlor	ft bgs. A y analysis of contar backfill. ide, GRC	5 point bottom returned a chlo ninated soil we A sample of the	oride val re expor le impor	tue of 112 n ted and disp ted caliche	ng/kg, a GRO va posed of at a NN was taken and s	alue of MOCD sent to a	<10 mg/k approved a commero	e and sent to a commercial g and a DRO value of 12 facility. A total of 140 cubic cial laboratory for analysis. ean, imported caliche and					
regulations al public health should their o or the environ	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:	K	La Pel	5				OIL CON	SERV	ATION  Sam X lb.	DIVISION					
Printed Name	: Ko1	part D	2665		A	Approved by	Environmental S	pecialis	t:						
Title: JEA	sm Su	erface	<i>[]</i>	ls Supervi	sor 1	Approval Dat	01/26/2016 e:		Expiration :	/// Date:					
E-mail Addre	// ,	ert.A.		~ ` ^		Conditions of	Approval:			Attached [					
	7/20			281-455-5		///	= =			Attached 1RP 3270					
Date:	1 20	1 %	rnone:	<u>~01~77)~X</u>	0 - 1	**				110 0270					