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By JKeyes at 3:16 pm, Feb 01, 2016

APPROVED

By JKeyes at 3:16 pm, Feb 01, 2016

CONOCOPHILLIPS

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

MCA Unit Station No. 2
(1RP-3311)

Termination Request

Release Date: September 3rd, 2015

Unit Letter C, Section 28, Township 17S, Range 32E



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

February 2nd, 2016

Jamie Keyes

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

**RE: Termination Request
ConocoPhillips MCA Unit Station No. 2 (1RP-3311)
UL/C sec. 28 T17S R32E**

Mr. Keyes:

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 3 miles southwest of Maljamar, New Mexico at UL/C sec. 28 T17S R32E. NM OSE, BLM and RECS installed monitor well records indicate that groundwater will likely be encountered at a depth of approximately 81 +/- feet.

On September 3rd, 2014, CoP discovered that a check valve from discharge malfunctioned, releasing 3 bbls of oil and 14 bbls of produced water from a suction line. The release encompassed 1, 221 sq ft of caliche pad. A total of 15 bbls of fluid were recovered. NMOCD was notified of the release on September 3rd, 2014 and an initial C-141 was submitted to NMOCD for approval. NMOCD approved the C-141 on September 4th, 2014 (Appendix A).

Basin personnel were on site to assess the release on July 20th, 2015. The release was mapped, photographed and sampled at three points. Representative samples were sent to a commercial laboratory for analysis. Laboratory analysis at Point 1 returned a chloride value of 3000 mg/kg at the surface, 272 mg/kg at 1 ft bgs and 176 mg/kg at 2.5 ft bgs. Gasoline Range Organics (GRO) and Diesel Range Organics (DRO), as well as benzene, toluene, ethylbenzene, total xylenes (BTEX) returned levels of non-detect. Laboratory analysis at Point 2 returned a chloride value of 128 mg/kg at the surface and 112 mg/kg at 6 inches bgs. GRO, DRO and BTEX returned levels of non-detect. Laboratory analysis of Point 3 returned a chloride value of 992 mg/kg at 6 inches, 320 mg/kg at 1 ft and 160 mg/kg at 3 ft bgs. GRO, DRO and BTEX returned levels of non-detect.

Based on the assessment, a Corrective Action Plan (CAP) was submitted to BLM and NMOCD August 8th, 2015. Both agencies approved the CAP the same day. The CAP stated that the release would be scraped to 1 ft bgs. All excavated soils would be taken to a NMOCD approved facility for disposal. Clean caliche would be imported to the site to use 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 scrape would be backfilled with the clean, imported caliche and contoured to the surrounding location.

CAP activities began August 11th, 2015. The release was scraped down to 1 ft bgs (Figure 1). All excavated soil, a total of 45 yards, was taken to a NMOCD approved facility for disposal. A total of 45 yards of clean caliche were imported to the site to serve as backfill. A representative sample of the imported caliche was taken to a commercial laboratory for analysis and returned a chloride value of 64 mg/kg (Appendix B). The scrape was then backfilled with the clean, imported caliche and contoured to the surrounding location.

Photo documentation of all field activities can be found in Appendix C.

Since CoP has completed all activities and stated in the 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,

A handwritten signature in dark ink, appearing to read "Kyle Norman", followed by a horizontal line.

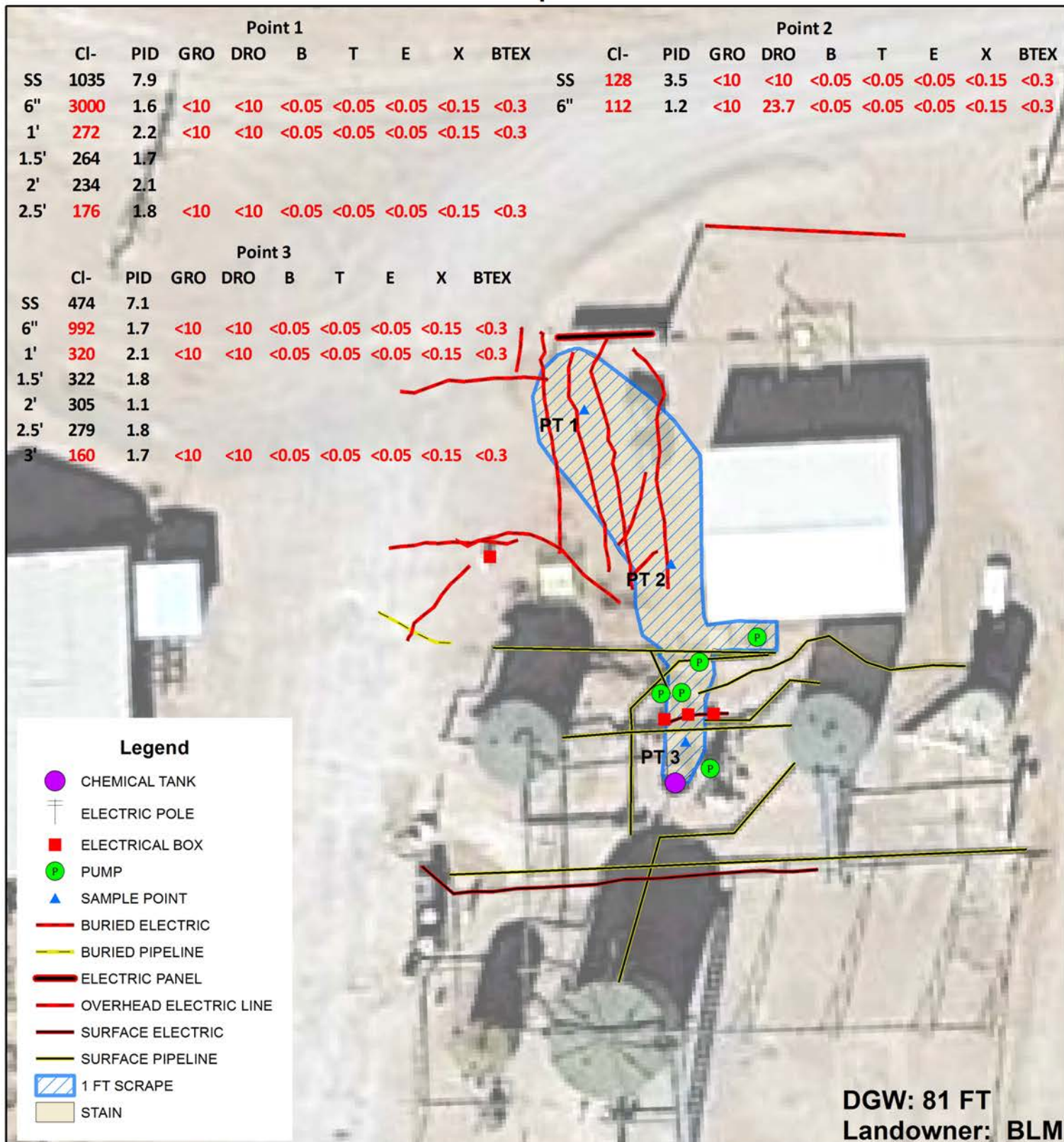
Kyle Norman
Project Lead
Basin Environmental Service Technologies
(575) 942-8542

Attachments:

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

Figures

Scrape



CONOCOPHILLIPS
MCA UNIT
STATION NO. 2
NMOCD Case #: 1RP-3311
Legals: UL/C sec. 28
T-17-S R-32-E
LEA COUNTY, NM

Figure 1

GPS Source: 32.812396, -103.774182
0 10 20 Feet
GPS date: 7/20/15 CF
Drawing date: 7/21/15
Drafted by: B. Cooper

Appendix A

Intial 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 Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

HOBBS OCD

Form C-141
Revised August 8, 2011

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

Submit 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: Spencer Cluff
Address: 29 Vacuum Complex Lane	Telephone No. 575-391-3143
Facility Name: MCA Unit Station No. 2	Facility Type: Water Injection Station
Surface Owner: NMOCD	Mineral Owner NMOCD
API No.	

LOCATION OF RELEASE

Unit Letter	Section 28	Township 17	Range 35E	Feet from the	North/South Line	Feet from the	East/West Line	County LEA
-------------	---------------	----------------	--------------	---------------	------------------	---------------	----------------	----------------------

Latitude **N32° 48.742'** Longitude - **W103° 46.465**

NATURE OF RELEASE

Type of Release: Spill	Volume of Release: 17 BBLS	Volume Recovered: 15 BBLS
Source of Release: Suction line	Date and Hour of Occurrence 09/03/14 10:30 am	Date and Hour of Discovery 09/03/2014 10:30 am
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Tomáš Oberding	
By Whom? Spencer Cluff	Date and Hour: 09/03/2014 3:43 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.*

On Sep 3, 2014, at 1030 hrs. MST a release of crude oil and produced water occurred. The release originated from the suction line approximately 60 ft. from station # 2. The check valve from discharge malfunctioned. MSO closed discharge valve from station # 2 to stop the leak. The affected area was 100 ft. X 20 ft. X 1 inch deep and resulted in 3 BO and 14 BPW, with 15 recovered. The affected area will be remediated according to NMOCD guidelines.

Describe Area Affected and Cleanup Action Taken.*

MSO closed discharge valve from station # 2 to stop the leak.

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		OIL CONSERVATION DIVISION	
Printed Name: Spencer Cluff		Approved by Environmental Specialist:	
Title: HSE Lead	Approval Date: 9-4-14	Expiration Date: 11-4-14	
E-mail Address: spencer.a.cluff@conocophillips.com	Conditions of Approval: <i>Site Supervisor Dehnto & remediate area as per NMOCD guide. Submit final</i>		Attached <input type="checkbox"/>
Date: 09/03/2014	Phone: 575-391-3143	12P-3311	

* Attach Additional Sheets If Necessary

C-141 by 11-4-14

SEP 05 2014

*09/03/2014 217817
F101924 747539
N101424 747857
P101424 748053*

Appendix B

Laboratory Analysis

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



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

August 18, 2015

KYLE NORMAN

BASIN ENVIRONMENTAL - HOBBS

419 W. CAIN

HOBBS, NM 88240

RE: MCA UNIT STATION #2

Enclosed are the results of analyses for samples received by the laboratory on 08/14/15 8:45.

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 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:

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

Received: 08/14/2015
Reported: 08/18/2015
Project Name: MCA UNIT STATION #2
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 08/13/2015
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: IMPORTED SOIL (H502117-01)**Chloride, SM4500Cl-B****mg/kg****Analyzed By: AP**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	08/17/2015	ND	432	108	400	0.00	

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

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



CARDINAL 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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: ConocoPhillips				BILL TO				ANALYSIS REQUEST																		
Project Manager: Kyle Norman				P.O. #:				<div style="display: flex; flex-direction: column; align-items: center;"> <div>Chlorides</div> <div>TPH 8015 M</div> <div>BTEX</div> <div>Texas TPH</div> <div>Complete Cations/Anions</div> <div>TDS</div> </div>																		
Address: 419 W Cain				Company: Basin																						
City: Hobbs State: NM Zip: 88240				Attn:																						
Phone #: 575-393-2967 Fax #: 575-393-0293				Address: 419 W Cain																						
Project #:				City: Hobbs																						
Project Owner:				State: NM Zip: 88240																						
Project Name: COP				Phone #: 575-393-2967																						
Project Location: MCA Unit Station #2				Fax #: 575-393-0293																						
Sampler Name: J. Kamplain																										
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												
H502117	Imported soil	9	1			/							8-13-15	7:55												

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 relating 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: 8-14-15	Received By:	Phone Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Phone #:
	Time: 8:45		Fax Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Fax #:
Relinquished By:	Date:	Received By:	REMARKS:	
	Time:		email results: hconder@basinenv.com; knorman@basinenv.com; jkamplain@basinenv; lflores@basinenv; lweinheimer@basinenv; cursanic@basinenv; sedwards@basinenv environmental tech: @basinenv	
Delivered By: (Circle One)		Sample Condition:		
Sampler - UPS - Bus - Other:	-0.80	Cool Intact		
		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	CHECKED BY:	

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

#54

Appendix C

Photo Documentation

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

ConocoPhillips MCA Unit Station No. 2

Unit Letter C, Section 28, T17S, R32E



Initial release area, facing southeast

7/20/15



Initial release area, facing northeast

7/20/15



Shoveling release, facing southwest

8/11/15



Exporting, facing northeast

8/11/15



Completed scrape, facing north

8/13/15



Completed scrape, facing southwest

8/13/15



Importing, facing southeast

8/13/15



Completed site, facing east

8/25/15



Completed site, facing south

8/25/15



Completed site, facing southeast

8/25/15

Appendix D

Final 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 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: 29 Vacuum Complex Lane	Telephone No.	
Facility Name: MCA Unit Station No. 2	Facility Type Water Injection Station	
Surface Owner: NMOCD	Mineral Owner: NMOCD	API No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
C	28	17S	35E					LEA

Latitude 32.812462 Longitude 103.774234

NATURE OF RELEASE

Type of Release: Spill	Volume of Release: 17 BBLs	Volume Recovered: 15 BBLs
Source of Release Suction Line	Date and Hour of Occurrence 9/3/2014 10:30 am	Date and Hour of Discovery 9/3/2014 10:30 am
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Tomas Oberding	
By Whom? Spencer Cluff	Date and Hour: 9/3/2014 3:43 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.*

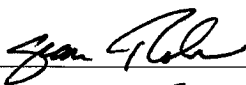

Describe Cause of Problem and Remedial Action Taken.*

On Sep 3, 2014, at 1030 hrs. MST a release of crude oil and produced water occurred. The release originated from the suction line approximately 60 ft. from station #2. The check valve from the discharge malfunctioned. MSO closed discharge valve from station #2 to stop the leak. The affected area was 100 ft. X 20 ft. X 1 inch deep and resulted in 3 BO and 14 BPW, with 15 recovered. The affected area will be remediated according to NMOCD guidelines.

Describe Area Affected and Cleanup Action Taken.*

The release was scraped down to 1 ft bgs. All excavated soil, a total of 45 yards, was taken to a NMOCD approved facility for disposal. A total of 45 yards of clean caliche were imported to the site to serve as backfill. A representative sample of the imported caliche was taken to a commercial laboratory for analysis and returned a chloride value of 64 mg/kg. The scrape was then backfilled with the clean, imported caliche 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.

Signature: 		OIL CONSERVATION DIVISION	
Printed Name: SEAN ROBINSON		Approved by Environmental Specialist: 	
Title: OPERATIONS SUPERVISOR	Approval Date: 02/01/2016	Expiration Date: ///	
E-mail Address: strabin@cop.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 11/4/15	Phone: 505-390-8873	///	1RP 3311

* Attach Additional Sheets If Necessary