



RECEIVED

By JKeyes at 9:10 am, Feb 05, 2016

APPROVED

By JKeyes at 9:10 am, Feb 05, 2016

CONOCOPHILLIPS

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

Vac Abo #13-10
(1RP-3580)

Corrective Action Plan

API No. 30-025-03070

Release Date: March 10th, 2015

U/L E & L, Section 4 & U/L H & I, Section 5 Township 18S, Range 35E



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

February 5th, 2016

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 Vac Abo # 13-10 (1RP-3580)
UL/E sec. 4 T18S R35E
API No. 30-025-03070**

Mr. Keyes:

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 2.6 miles southeast of Buckeye, New Mexico. The initial C-141 states that the site is located at UL/J sec. 85. However, GIS mapping shows the site to be located within UL/E sec. 4 T18S R35E. NM OSE and Non-COP monitor well records indicate that groundwater will likely be encountered at a depth of approximately 67 +/- feet.

On March 10th, 2016, CoP discovered a release from a steel flow line leak. A total of 10 barrels of oil & 14 barrels of produced water was released over 18,427 sq ft of pasture land. With 5 barrels of oil and 5 barrels of produced water recovered. NMOCD was notified of the release on March 11th, 2015, and an initial C-141 was submitted to NMOCD. NMOCD approved the initial C-141 on March 24th, 2015 (Appendix A).

Basin personnel were on site to assess the release January 11th, 2016. The release was mapped and photographed (Figure 1). On January 21st, 2016, five verticals were installed within the release area were sampled at the surface and with depth (Figure 1). The samples were field tested for chlorides and for organic vapors with a PID meter. Representative samples were sent to a commercial laboratory for analysis (Appendix B). Laboratory analysis of Point 1 at the 6 feet bgs returned a chloride value of 176 mg/kg, Gasoline Range Organics (GRO) and Diesel Range Organics (DRO) values of non-detect. Point 2 at 6 feet bgs returned a chloride reading of 48 mg/kg, GRO and DRO values of non-detect. Point 3 at the 6 feet bgs returned a chloride reading of 192 mg/kg, a GRO value of non-detect and a DRO value of 12.4 mg/kg. Point 4 at 4 feet bgs returned a chloride reading of 208 mg/kg, a GRO and DRO value of non-detect. Point 5

at 1.5 feet bgs returned a chloride reading of 288 mg/kg, a GRO value of non-detect and DRO value of 94.4 mg/kg.

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

Corrective Action Plan

Based on the laboratory analysis and the difficulty of excavating through the hard substrate at the site, the area around Vertical 1 through 4 will be excavated to a depth of 2.5 ft bgs. At the base of the excavation, a 20-mil reinforced poly liner will be installed and properly seated. The excavation will then be backfilled with clean soil. The area around vertical 5 will be excavated to a depth of 1.5 ft. bgs and backfilled with clean soil.

There is a buried line running through the center of the release. To provide for the safety of people and equipment at the site, both excavations will remain 5 ft away from this line and per a Plains Pipeline Request, the excavation in the pasture will remain 20 ft away from their pipeline.

All excavated soil will be taken to a NMOCD approved facility for disposal. A sample of the backfill soil will be taken to a commercial laboratory to confirm that the chloride reading is below regulatory standards. The pasture will be backfilled with clean, imported top soil. The site will be contoured to the surrounding location. The pasture area will be seeded with a blend of native vegetation.

Once these activities have been completed, a report will be sent to NMOCD 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,

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

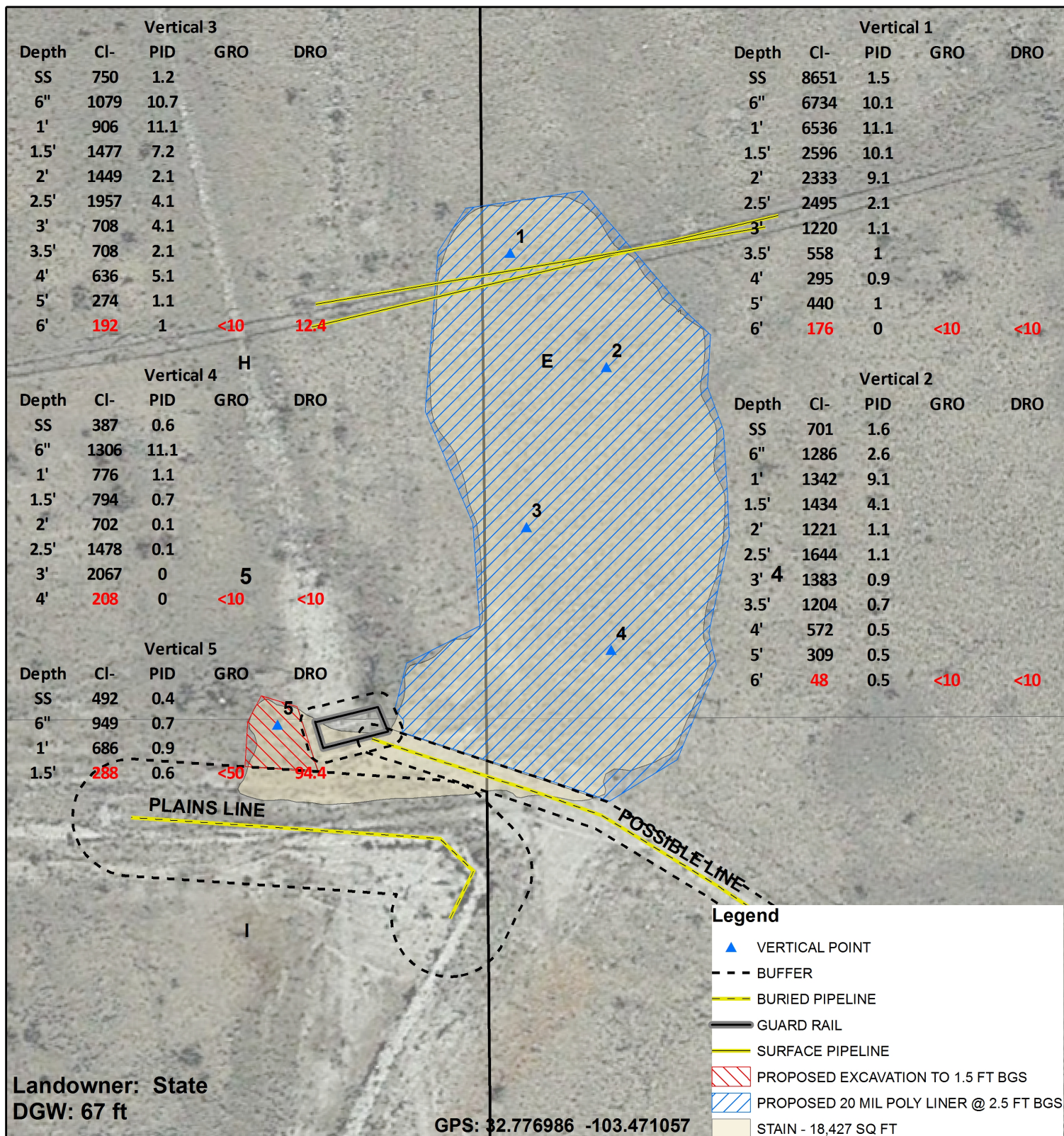
Kyle Norman
Project Lead
Basin Environmental Service Technologies
(575) 942-8542

Attachments:

- Figure 1 – Vertical Data & Proposed Corrective Actions
- Appendix A – Initial C-141
- Appendix B – Laboratory Analysis
- Appendix C – Photo Documentation

Figures

Vertical Data and Proposed Corrective Actions



CONOCOPHILLIPS ABO 13-10

1RP-3580

UL E & L SECTION 4
UL H & I SECTION 5
T-18-S R-35-E
LEA COUNTY, NM

Underground facilities are
spatially projected
and need to be field verified.

Figure 1

0 25 50 Feet
GPS date: 1/12/16, 1/21/16 JK
Drawing date: 2/5/16
Drafted by: T. Grieco



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

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: Jay Garcia	
Address: 29 Vacuum Complex Lane	Telephone No. 575-704-2455	
Facility Name: Vac Abo # 13-10	Facility Type: Well	
Surface Owner: NMOCD	Mineral Owner:	API No. 30-025-03070

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
J	85	18S	35E	1900	South	2310	East	LEA

Latitude 32.4626508,- Longitude 103.298052

NATURE OF RELEASE

Type of Release: Spill	Volume of Release: 10 BO/14 BPW	Volume Recovered. 5 BO/ 5 BPW
Source of Release: Flow line leak.	Date and Hour of Occurrence 03/10/2015 2:00 pm	Date and Hour of Discovery 03/10/2015 2:00 pm
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Tomas Oberding- NMOCD	
By Whom? Jay Garcia	Date and Hour: 03/11/2015 11:50 am	
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.*		

RECEIVED

By OCD; Dr. Oberding at 12:34 pm, Mar 24, 2015

ENV – Agency Reportable – 10 BO/14 BPW – Vac Abo 14-4 – RR II – MCBU – Buckeye – On Tuesday March 10, 2015 at 1400 MDT, at the Vac Abo 14-4 during normal rounds, the MSO responded to a flow line leak resulting in a release of 10 BO and 14 BPW with 5 BO and 5 BPW recovered. Immediate action was to isolate the well and flow line. The affected area will be remediated according to NMOCD and COPC and guidelines. This is a Tier 3 event. Consequence: 1, Likelihood: 5, RR: II

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: <i>Jay Garcia</i>		OIL CONSERVATION DIVISION	
Printed Name: Jay Garcia		Hydrologist Approved by Environmental Specialist: <i>[Signature]</i> PhD	
Title: LEAD HSE		Approval Date: 03/24/2015	Expiration Date: 06/24/2015
E-mail Address: jay.c.garcia@conocophillips.com		Conditions of Approval: Site samples required. Delineate and remediate area as per NMOCD guides.	
Date: 01/06/2015 Phone: 575-704-2455		Attached <input type="checkbox"/> 1RP-3580 217817	

* Attach Additional Sheets If Necessary

nTO1508345662

pTO1508345848

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

January 28, 2016

KYLE NORMAN

Basin Environmental Service

P.O. Box 301

Lovington, NM 88260

RE: ABO 13-10 (1RP-3580)

Enclosed are the results of analyses for samples received by the laboratory on 01/26/16 8:20.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-15-7. 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 style with a large, stylized 'C' and 'K'.

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: 01/26/2016
Reported: 01/28/2016
Project Name: ABO 13-10 (1RP-3580)
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 01/21/2016
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: PT. 1 @ 6' (H600172-01)

Chloride, SM4500Cl-B			mg/kg		Analyzed By: AP				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	176	16.0	01/26/2016	ND	416	104	400	0.00	
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	01/26/2016	ND	190	94.9	200	4.43	
DRO >C10-C28	<10.0	10.0	01/26/2016	ND	184	92.0	200	2.67	
Surrogate: 1-Chlorooctane	72.8 %	35-147							
Surrogate: 1-Chlorooctadecane	73.5 %	28-171							

Sample ID: PT. 2 @ 6' (H600172-02)

Chloride, SM4500Cl-B			mg/kg		Analyzed By: AP				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	01/26/2016	ND	416	104	400	0.00	
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	01/26/2016	ND	190	94.9	200	4.43	
DRO >C10-C28	<10.0	10.0	01/26/2016	ND	184	92.0	200	2.67	
Surrogate: 1-Chlorooctane	77.9 %	35-147							
Surrogate: 1-Chlorooctadecane	79.3 %	28-171							

Cardinal Laboratories

*=Accredited Analyte

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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:	01/26/2016	Sampling Date:	01/21/2016
Reported:	01/28/2016	Sampling Type:	Soil
Project Name:	ABO 13-10 (1RP-3580)	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: PT. 3 @ 6' (H600172-03)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	192	16.0	01/26/2016	ND	416	104	400	0.00	
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	01/26/2016	ND	190	94.9	200	4.43	
DRO >C10-C28	12.4	10.0	01/26/2016	ND	184	92.0	200	2.67	
Surrogate: 1-Chlorooctane	74.9 %	35-147							
Surrogate: 1-Chlorooctadecane	76.4 %	28-171							

Sample ID: PT. 4 @ 4' (H600172-04)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	208	16.0	01/26/2016	ND	416	104	400	0.00	
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	01/26/2016	ND	190	94.9	200	4.43	
DRO >C10-C28	<10.0	10.0	01/26/2016	ND	184	92.0	200	2.67	
Surrogate: 1-Chlorooctane	70.7 %	35-147							
Surrogate: 1-Chlorooctadecane	72.9 %	28-171							

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*=Accredited Analyte

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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: 01/26/2016
Reported: 01/28/2016
Project Name: ABO 13-10 (1RP-3580)
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 01/20/2016
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: PT. 5 @ 1.5' (H600172-05)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	288	16.0	01/26/2016	ND	416	104	400	0.00	
TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<50.0	50.0	01/26/2016	ND	190	94.9	200	4.43	
DRO >C10-C28	94.4	50.0	01/26/2016	ND	184	92.0	200	2.67	

Surrogate: 1-Chlorooctane 63.9 % 35-147

Surrogate: 1-Chlorooctadecane 86.4 % 28-171

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*=Accredited Analyte

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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



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

Project Manager: Kyle Norman

Address: 419 W Cain

City: Hobbs

Phone #: 575-393-2967

Project #:

Project Name:

Project Location:

Sample Name:

P.O. #:

Company: Basin

Attn:

Address: 419 W Cain

City: Hobbs

State: NM Zip: 88240

Phone #: 575-393-2967

Fax #: 575-393-0293

BILL TO

ANALYSIS REQUEST

Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX						DATE	TIME	ANALYSIS REQUEST							
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :			ACID/BASE:	ICE / COOL	OTHER :	Chlorides	TPH 8015 M	BTEX	Texas TPH	Complete Cations/Anions
11600172	P-1 @ 6'	9	1							1-21-16	10:30								
33	P-2 @ 6'	9	1							11:00	11:00								
34	P-3 @ 6'	9	1							11:15	11:15								
5	P-4 @ 4'	9	1							1-20-16	12:00								
	P-5 @ 1.5'	9	1							1-20-16	12:45								

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Relinquished By:

Date:

Received By:

Phone Result: ☐ Yes ☒ No Add'l Phone #:

Fax Result: ☐ Yes ☒ No Add'l Fax #:

REMARKS:

Relinquished By:

Date:

Received By:

email results:

hconder@basineny.com; knorman@basineny.com;

jkamplain@basineny.com; lflores@basineny.com; lweilheimer@basineny.com;

cursanic@basineny.com; sedwards@basineny.com; @basineny

Delivered By: (Circle One)

Sampler - UPS - Bus - Other:

Sample Condition

Cool ☐ Intact ☒

CHECKED BY:

(initials)

† 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

Conoco Phillips ABP 13-10 (1RP-3580)

Unit Letter E & L Section 4 & Unit Letter H & I, Section 5, T18S, R35E



Initial release area, facing north west 1/12/2016



Initial release area, facing east 1/12/2016



Initial release area, facing south east 1/12/2016



Installing vertical, facing south west 1/20/2016