

Stipulation:
Provide a map of the spill area depicting the confirmation sample points.

ConocoPhillips

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

Buck Federal CTB (RP-4262) Corrective Action Plan

NMLC 068281B

Release Date: April 23, 2016

Unit P, Section 17, Township 26S, Range 32E

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 Buck Federal CTB NMLC 068281B

Mr. Keyes:

ConocoPhillips (CoP) has prepared this Corrective Action Plan (CAP) to address potential environmental concerns at the above-referenced site.

Background and Previous Work

On Saturday April 23, 2016 at 0400, a release of produced water occurred due to a tank over flow, resulting in the release of 16 BBLs of produced water with 15 BBLs of water recovered. Immediate action was to shut down all pumps feeding that tank battery. NMOCD was notified of the release on March 25, 2016, and an initial C-141 was submitted (Appendix A).

COP personnel were on site to visually assess the release on April 24, 2016. The release was mapped and photographed (Appendix B). Based on the assessment, the release will be excavated down 6 inches bgs. Once the excavation is completed, a Composite sample from the bottom of the excavation will be taken and field tested for chlorides and organic vapors. If the field data indicates that the composite will not achieve chloride, Gasoline Range Organics (GRO), Diesel Range Organics (DRO) and BTEX readings below regulatory standards, the excavation will be deepened until field testing indicates that all constituents from bottom discrete samples (three discrete samples will be collected) will return values below regulatory standards. The bottom samples will then be taken to a commercial laboratory to confirm that chloride, GRO, DRO and BTEX readings are below regulatory standards.

All excavated soils will be taken to a NMOCD approved facility for disposal. Clean soil will be imported to the site to serve as backfill and contoured to the surrounding location

Once these activities have been completed, a report will be sent to NMOCD requesting 'remediation termination' and site closure.

Please call me if you have any questions or wish to discuss the site. Sincerely,

Joseph McLaughlin HSE Specialist (806) 567-2790

Attachments:

Figure 1 – Site Map Appendix A – Initial C-141 Appendix B – Photo Documentation

Figure 1 – Site 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
10 District III
11 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 Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Form C-141

Santa Fe, NM 87505 Release Notification and Corrective Action OPERATOR Initial Report
Final Report Contact: Joseph McLaughlin Name of Company: ConocoPhillips Address: 3695 Highway 285, Orla TX Telephone No. 806-567-2790 Facility Name: Buck Federal CTB Facility Type: Central Tank Battery Surface Owner: NMOCD Mineral Owner: NMOCD API No. LOCATION OF RELEASE North/South Line Feet from the Unit Letter Section Township Range Feet from the East/West Line County West Latitude N32°2'14" Longitude W103°41'48" NATURE OF RELEASE Type of Release: Spill Volume of Release: 16 BBLS Volume Recovered: 15 BBLS Source of Release: Produced Water tank over flow (see Lat/Long Date and Hour of Occurrence Date and Hour of Discovery 04/23/2016 04:00 am 04/23/2016 04:40 am above). Was Immediate Notice Given? If YES, To Whom? Jamie Keyes, NMOCD Yes No Not Required By Whom? Joseph McLaughlin Date and Hour: 04/25/2016 07:10 am Was a Watercourse Reached? If YES, Volume Impacting the Watercourse. Yes No If a Watercourse was Impacted, Describe Fully.* Describe Cause of Problem and Remedial Action Taken.* Describe Area Affected and Cleanup Action Taken.3 A 16 BBL Produced Water release occurred on the ConocoPhillips Buck Federal CTB located in Lea County, New Mexico: Upon arrival to location MSO noticed fluids inside the containment area. During closer inspection noticed that water was over flowing from the top of the tank. MSO shut down the pumps and contacted vacuum trucks for liquid recovery. Once the pumps were off and the area deemed safe, the water hauler on location recovered the produced water in containment. The leak resulted in approximately 16 BBLs of produced water spilled to containment (with 15 BBLs recovered). Location will be remediated in accordance with NMOCD and COPC policies with confirmation soil samples. 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: Approved by Environmental Specialist: Printed Name: Joseph McLaughlin Expiration Date: Approval Date: E-mail Address: Joe.P.McLaughlin@conocophillips.com Conditions of Approval: Attached |

* Attach Additional Sheets If Necessary

Date: 04/26/2016

Appendix B – Photo Documentation

Phone:806-567-2790



View looking towards the North (3/23/2016)





