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By JKeyes at 8:29 am, May 04, 2016



APPROVED

CONOCOPHILLIPS

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

State J2 Battery (1RP-3466)

Termination Request

API No. 30-025-33277

Release Date: December 17th, 2014

Unit Letter I, Section 2, Township 22S, Range 36E



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

May 3rd, 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 State J2 Battery (1RP-3466)
UL/I sec. 2 T22S R36E
API No. 30-025-33277**

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 4.4 miles southwest of Eunice, New Mexico. The initial C-141 states that the site is located at UL/T Sec. 2 T22S R32E. However, GIS mapping shows the site to be located within UL/I Sec. 2 T22S R36E. NM OSE, BLM and Basin installed monitor well records indicate that groundwater will likely be encountered at a depth of approximately 130 +/- feet.

On December 17th, 2014, CoP discovered that a tank had overflowed, releasing 10 barrels of oil and 5 barrels of produced water over 1,558 sq ft of caliche pad. Approximately 1,833 sq ft of pasture & pad was also affected by overspray. A total of 10 barrels of oil and produced water were recovered. NMOCD was notified of the release on December 18th, 2014, and an initial C-141 was submitted to NMOCD for approval. NMOCD approved the C-141 on December 18th, 2014 (Appendix A).

Basin personnel were on site to visually assess the release on December 22nd, 2014. The release was mapped (Figure 1) and photographed (Appendix C). On October 7th, 2015, samples were taken at the surface and with depth and sent to a commercial laboratory for analysis. Laboratory analysis (Appendix B) of Point 1 Surface returned a chloride and a Gasoline Range Organics (GRO) and Diesel Range Organics (DRO) value of non detect, Point 2 Surface chloride and a Gasoline Range Organics (GRO) value of non detect and Diesel Range Organics (DRO) value of 27.2 mg/kg, Point 3 surface chloride value of 368, a GRO value of non detect, a DRO value of 13,300 mg/kg and BTEX values of non-detect, at 6" chloride value of 64, a GRO value of non

detect, a DRO value of 3,170 mg/kg and BTEX values of non-detect, Point 4 surface chloride value of 192, a GRO value of non detect, a DRO value of 24,100 mg/kg and BTEX values of non-detect, at 6" chloride value of 176, a GRO value of non detect, a DRO value of 1,360 mg/kg and BTEX values of non-detect (Appendix B).

The overspray on the pasture and pad around Points 1 and 2 was washed with clean water and Dawn dish soap to remove any staining.

A Corrective Action Plan (CAP) was submitted to NMOCD on November 3rd, 2015 and was approved by NMOCD on November 4th, 2015. Basin recommended that the release be scraped to a depth of 6" bgs around points 3 & 4. Once the scrape is completed, discreet samples from the bottom of the scrape will be taken and field tested for chlorides and organic vapors. If the field data indicates that the samples will not achieve chloride, Gasoline Range Organics (GRO), Diesel Range Organics (DRO) and BTEX readings below regulatory standards, the scrape will be deepened until field testing indicates that all constituents from the discreet samples will return values below regulatory standards. The discreet samples will then be taken to a commercial laboratory to confirm that all constituents return 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 use as backfill. A sample of the imported soil will be taken to a commercial laboratory to confirm that the chloride reading is below regulatory standards. The scrape will be backfilled with the clean, imported soil and contoured to the surrounding location.

CAP activities began on December 3rd, 2015. The release was scraped to a depth of 6" around points 3 & 4 and approximately 30 yards was taken to NMOCD approved facility for disposal. At the base of the scrape 2 discreet samples were obtained and sent to a commercial laboratory for analysis (Appendix B). The discreet sample at PT. 1 @6" returned a chloride result of 48 mg/kg, GRO of < 10 and DRO of 15.8. The discreet sample at PT. 2 @6" returned a chloride result of <16 mg/kg, GRO of <10 and GRO <10. Basin received backfill approval from NMOCD on December 9th, 2015 and on December 16th, 2015 approximately 30 yards base course was imported to site. A sample of the imported soil was also taken to a commercial laboratory for analysis. The imported sample returned a chloride result of 32 mg/kg. Site was backfilled with imported material.

Photo documentation of these activities can be found in Appendix C.

Given that the CAP activities have been completed as approved by NMOCD, Conoco Phillips respectfully request 'remediation termination' and site closure. The 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, reading "Kyle Norman" with a long horizontal flourish extending to the right.

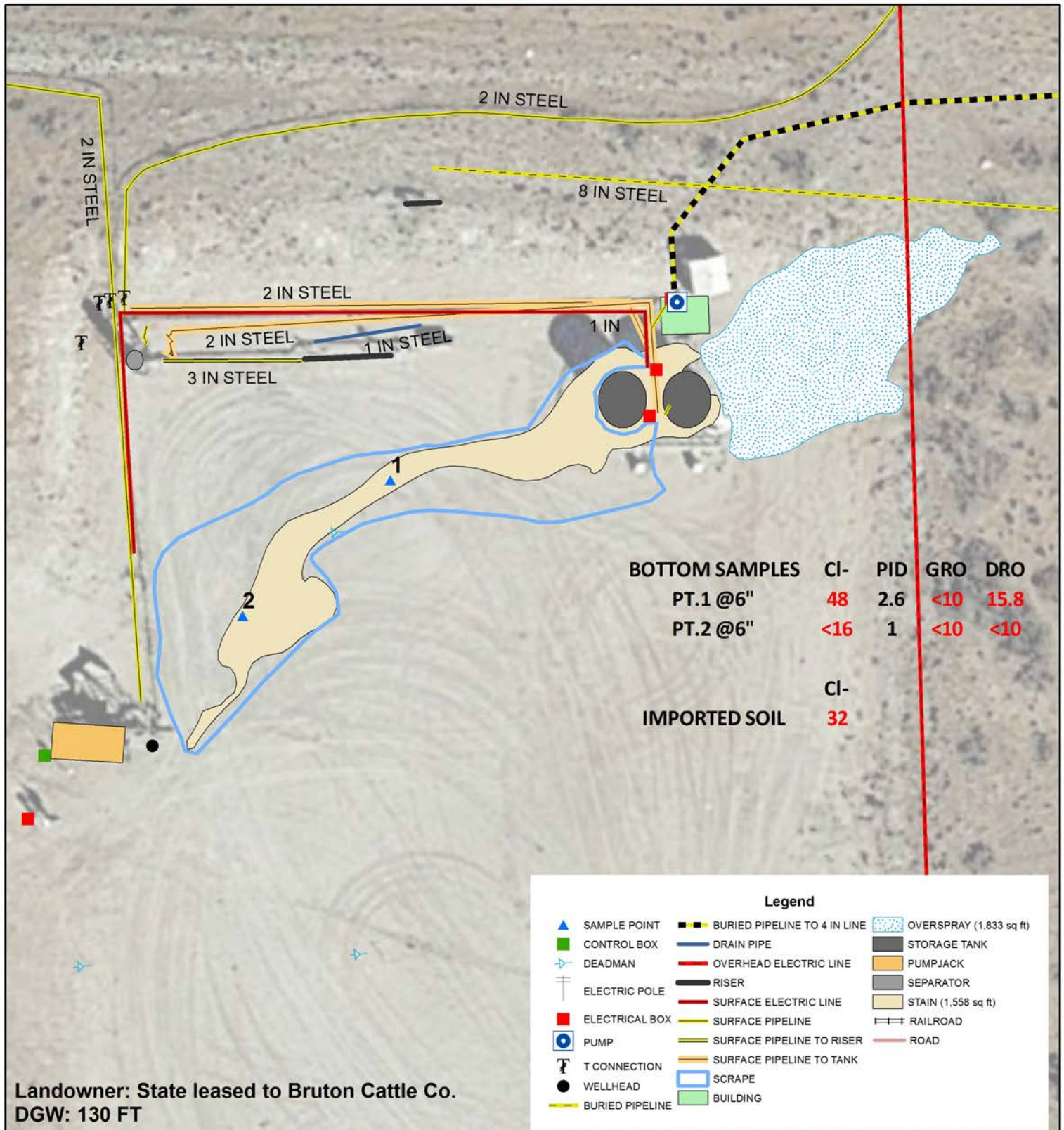
Kyle Norman
Project Lead
Basin Environmental Service Technologies, LLC
(575) 942-8542

Attachments:

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

Figures

Excavation



Basin Environmental
Effective Solutions
Service Technologies

CONOCOPHILLIPS
STATE J 2 BATTERY

1RP-3466

Legals: UL/I sec. 2
T-22-S R-36-E
LEA COUNTY, NM

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

GPS: 32.417448 -103.230590

0 25 50 Feet

GPS date: 12/7/15 JK
Drawing date: 12/8/15
Drawn 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
HOBBS
Oil Conservation Division
20 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: Jose A Zepeda
Address: 1410 N West County Road	Telephone No. 575-391-3165
Facility Name: State J2 Battery	Facility Type: Battery

Surface Owner: State	Mineral Owner: N/A	API No. 300250415700801
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LOCATION OF RELEASE

30025 31277 70

Unit Letter T	Section 2	Township 20S 22S	Range 36E 32E	Feet from the	North/South Line	Feet from the	East/West Line	County Lea
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Latitude **32.4173** Longitude **-107.2307**

NATURE OF RELEASE

Type of Release: OIL/Produce Water	Volume of Release: 15 BBLs	Volume Recovered: 10BBL
Source of Release: Tank	Date and Hour of Occurrence 12/17/2014 ~1730	Date and Hour of Discovery SAME
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Oberding, Tomas, VIA Email	
By Whom? Jose A Zepeda	Date and Hour: 12/18/2014 ~1300	
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

Describe Cause of Problem and Remedial Action Taken.* On December 17, 2014 @ ~1730 hrs. MST @ the State J2 Battery, there was an accidental discharge from a tank over flow. COPC MSO received a call from supervisor about a stuffing box leak. COPC MSO arrived on location and discovered there was not a stuffing box leak; however a tank was running over. COPC MSO shut in location to cease anymore loss of fluid; he then checked panel views and head switches and all were incorrect. COPC MSO discovered transfer pump never came on to dump water from tank and MSO never received any alarms prior to this incident. COPC MSO got a vacuum truck to pull down tank he also contacted COPC I&E to come and get pump running. COPC MSO finally received alarms at approx. 7:30 P.M., about 2 hours after incident had already happened. Total loss of fluid was approx. 10bbls oil and 5bbls water. COPC MSO continued on without any further incidents. Spill site will be remediated in place in accordance with COPC and NMOCD guidelines.

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: 12-18-14	Expiration Date: 2-18-15
E-mail Address: Jose. A. Zepeda@conocophillips.com	Conditions of Approval: <i>Site Supervisor signed - Delute and Remediate area as per NMOCD guidelines Submit final C-141 by 27819</i>		Attached <input type="checkbox"/> IRP-3466
Date: 12/18/14	Phone: 575-391-3158		

* Attach Additional Sheets If Necessary

DEC 23 2014

5092
121014 3524974
PT014 35249952

Appendix B

Laboratory Analysis

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

December 08, 2015

KYLE NORMAN

BASIN ENVIRONMENTAL - HOBBS

419 W. CAIN

HOBBS, NM 88240

RE: STATE J-2 BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 12/07/15 13:44.

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: 12/07/2015
 Reported: 12/08/2015
 Project Name: STATE J-2 BATTERY
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 12/07/2015
 Sampling Type: Soil
 Sampling Condition: ** (See Notes)
 Sample Received By: Judy Garcia

Sample ID: PT 1 @ 6" (H503178-01)

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	12/07/2015	ND	400	100	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	12/08/2015	ND	201	101	200	7.23	
DRO >C10-C28	15.8	10.0	12/08/2015	ND	205	102	200	6.41	

Surrogate: 1-Chlorooctane 91.1 % 35-147

Surrogate: 1-Chlorooctadecane 98.8 % 28-171

Sample ID: PT 2 @ 6" (H503178-02)

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	12/07/2015	ND	400	100	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	12/08/2015	ND	201	101	200	7.23	
DRO >C10-C28	<10.0	10.0	12/08/2015	ND	205	102	200	6.41	

Surrogate: 1-Chlorooctane 93.2 % 35-147

Surrogate: 1-Chlorooctadecane 104 % 28-171

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		P.O. #:		BILL TO																																	
Project Manager: Kyle Norman		Company: Basin		ANALYSIS REQUEST																																	
Address: 419 W Cain		Attn:																																			
City: Hobbs		State: NM Zip: 88240																																			
Phone #: 575-393-2967		Fax #: 575-393-0293																																			
Project #:		Project Owner:																																			
Project Name:		State: NM Zip: 88240																																			
Project Location: State I-2 Balford		Phone #: 575-393-2967																																			
Sampler Name: Skomplain		Fax #: 575-393-0293																																			
FOR LAB USE ONLY																																					
Lab I.D. H50378	Sample I.D. P-1 @ 6" P-2 @ 6"	(G)RAB OR (C)OMP.		# CONTAINERS		GROUNDWATER		WASTEWATER		SOIL		OIL		SLUDGE		OTHER :		ACID/BASE:		ICE / COOL		OTHER :		DATE		TIME											
		91		1		1		1		1		1		1		1		1		1		1		12-7-15		12:00											

Appendix C

Photo Documentation

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

ConocoPhillips J2 Battery

Unit Letter I, Section 2, T22S, R36E



Initial release area, facing southwest

12/22/14



Initial release area, facing northeast

12/22/14



Initial release area, facing west

12/22/14



Washed overspray area, Facing southwest

10/06/15



Scraping leak area, facing north

12/3/15



Scraping leak area, facing south west

12/7/15



Exporting soil, facing north east

12/7/15



Final scrape photo, facing north east

12/7/15



Backfilling site, facing east

12/16/15



Final photo, facing west

2/1/16



Final photo, facing west

2/1/16

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: Jose A Zepeda
Address: 1410 N West County Road	Telephone No. 575-391-3165
Facility Name: State J2 Battery	Facility Type: Battery
Surface Owner: State	Mineral Owner: N/A
API No. 3002533277	

LOCATION OF RELEASE

Unit Letter I	Section 2	Township 22S	Range 36E	Feet from the	North/South Line	Feet from the	East/West Line	County Lea
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Latitude **32.4173** Longitude **-103.2307**

NATURE OF RELEASE

Type of Release: OIL/Produce Water	Volume of Release: 15 BBLS	Volume Recovered: 10BBL
Source of Release: Tank	Date and Hour of Occurrence 12/17/2014 ~1730	Date and Hour of Discovery SAME
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Oberding, Tomas, VIA Email	
By Whom? Jose A Zepeda	Date and Hour: 12/18/2014 ~1300	
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		

Describe Cause of Problem and Remedial Action Taken.* On December 17, 2014 @ ~1730 hrs. MST @ the State J2 Battery, there was an accidental discharge from a tank over flow. COPC MSO received a call from supervisor about a stuffing box leak. COPC MSO arrived on location and discovered there was not a stuffing box leak; however a tank was running over. COCP MSO shut in location to cease anymore loss of fluid; he then checked panel views and head switches and all were incorrect. COPC MSO discovered transfer pump never came on to dump water from tank and MSO never received any alarms prior to this incident. COPC MSO got a vacuum truck to pull down tank he also contacted COPC I&E to come and get pump running. COPC MSO finally received alarms at approx. 7:30 P.M., about 2 hours after incident had already happened. Total loss of fluid was approx. 10bbls oil and 5bbls water. COPC MSO continued on without any further incidents. Spill site will be remediated in place in accordance with COPC and NMOCD guidelines.

Describe Area Affected and Cleanup Action Taken.* The release covered 1,558 sq ft of caliche pad and approximately 1,833 sq ft of pasture and pad was affected by overspray. Basin was on site December 22nd, 2014 to visually assess site and to sample site on October 7th, 2015. Based on the assessment a CAP was submitted to NMOCD on November 3rd, 2015 and approved by NMOCD on November 4th, 2015. CAP activities began on December 3rd, 2015. The release was scraped a depth of 6" and 2 discreet samples were taken from the base of the scrape and taken to a commercial laboratory for analysis. Both PT1 @6" and PT2 @6" returned a chloride, DRO/GRO result below regulatory standard. Approximately 30 yards was hauled to and NMOCD approved facility for disposal. Approximately 30 yards caliche was imported to site for backfilling purposes. A sample was taken from the imported soil and sent to a commercial laboratory for analysis. The imported sample returned a chloride result of 32 mg/kg. Site was then backfilled with imported caliche and contoured to surrounding area.

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>Rob Dobb</i>	OIL CONSERVATION DIVISION	
Printed Name: Robert Dobb	Approved by Environmental Specialist:	
Title: SENM Surface Projects Supervisor	Approval Date:	Expiration Date:
E-mail Address: Robert.A.Dobb@ConocoPhillips.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: 4/28/16	Phone: 281-455-0821	