

APPROVED



CONOCOPHILLIPS

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

EVGSAU CTB (1RP-3670)

Corrective Action Plan

API No. 30-025-2667900

Release Date: June 12th, 2015

Unit Letter A, Section 33, Township 17S, Range 35E



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

May 23rd, 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 EVGSAU CTB (1RP-3670)
UL/A sec. 33 T17S R35E
API No. 30-025-2667900**

Mr. Keyes:

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

Background and Previous Work

The site is located approximately 2.8 miles east south east of Buckeye, New Mexico at UL/A sec. 33 T17S R35E. NM OSE and Basin installed monitor well records indicate that groundwater will likely be encountered at a depth of approximately 70 +/- feet.

On June 12th, 2015, CoP discovered a release from an eight inch transfer line. A total of 30 barrels of oil was released over 2,042 sq ft of lease pad and 414 sq ft in the lined facility with 20 barrels of oil recovered. NMOCD was notified of the release on June 12th, 2015, and an initial C-141 was submitted and approved by NMOCD on June 15th, 2015 (Appendix A).

On June 16th, 2015, Basin personnel were on site to assess the release. On May 20th, 2016 two points within the release area were sampled with depth (Figure 1). All samples were field tested for chlorides and organic vapors, and representative samples were taken to a commercial laboratory for analysis (Appendix B).

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

Corrective Action Plan

Based on the assessment, the release around point 1 will be excavated down to 2 ft bgs, the release around point 2 will be excavated down to 1.5 ft bgs. There are buried lines running throughout the release. To provide for the safety of people and equipment at the site, the excavation will remain 5 ft away from the buried lines.

All excavated soil will be taken to a NMOCD approved facility for disposal. Clean soil will be imported to the site to serve as backfill. A sample of the backfill soil will be taken to a commercial laboratory to confirm that the chloride reading is below regulatory standards. The lease pad will be backfilled with clean, imported soil. The site will be contoured to the surrounding location.

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 dark ink, appearing to read "Kyle Norman", followed by a horizontal line.

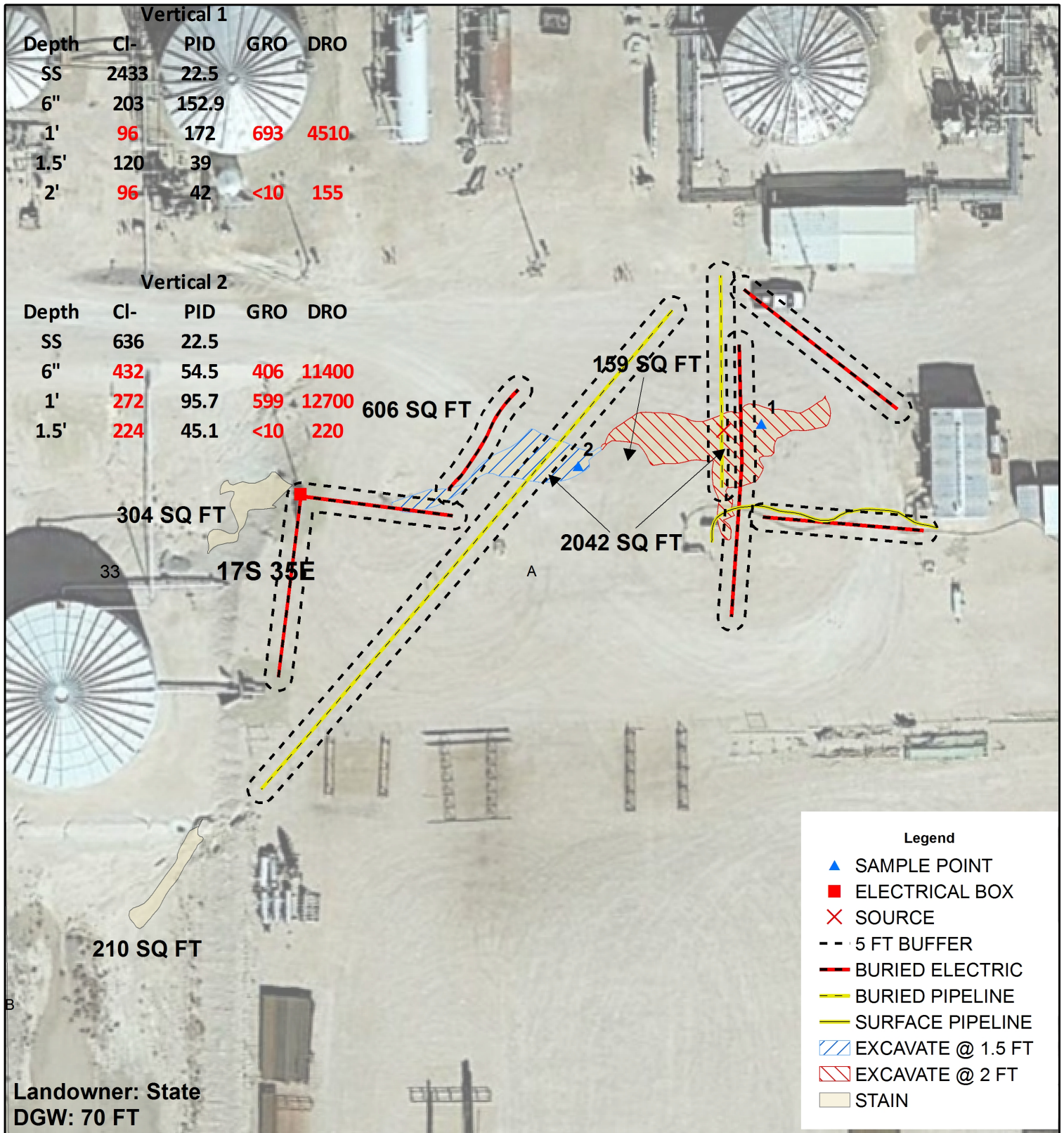
Kyle Norman
Project Lead
Basin Environmental Service Technologies
(575) 942-8542

Attachments:

- Figure 1 – Initial sampling data
- Appendix A – Initial C-141
- Appendix B – Laboratory Analysis
- Appendix C – Photo Documentation

Figures

Initial Sampling



CONOCOPHILLIPS EVGSAU CENTRAL TANK BATTERY

1RP-3670

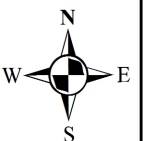
UL A SECTION 33
T-17-S R-35-E
LEA COUNTY, NM

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

GPS CENTER STAIN: 32.796222 -103.457763

0 25 50
Feet

GPS date: 6/16/15 CF
Drawing date: 6/17/15
Drafted by: T. Grieco



Appendix A

Intial 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: Jay Garcia
Address: 29 Vacuum Complex Lane	Telephone No. 575-704-2455
Facility Name: EVGSAU CTB	Facility Type: Battery

Surface Owner: NMOCD	Mineral Owner:	API No. 30-025-2667900
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LOCATION OF RELEASE

Unit Letter A	Section 33	Township 17S	Range 35E	Feet from the 250	North/South Line North	Feet from the 150	East/West Line East	County LEA
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Latitude **32.7979432251344** Longitude **103.454578927405**

NATURE OF RELEASE

Type of Release: Leak	Volume of Release: 30 bbl. of oil	Volume Recovered: 20 bbl. of oil
Source of Release: Discharge Line	Date and Hour of Occurrence 06/12/2015 6:30 am	Date and Hour of Discovery 06/12/2015 6:30 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 / Kellie Jones	
By Whom? Jay Garcia	Date and Hour: 06/12/2015 9:45 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.*

ENV – Agency Reportable – 30 bbls oil – EVGSAU CTB – RR II – MCBU – Buckeye – On Friday June 12, 2015 at 0630 MDT, at EVGSAU CTB, MSO found a leak on a 8 inch transfer line that resulted in a release of 30 bbls of oil, with 20 bbls recovered. Immediate action was to isolate the leak and turn in a work order for repair and remediation. The affected area will be remediated according to NMOCD, BLM and COPC guidelines. This is a Tier 2 PSE.

RECEIVED

By OCD District 1 at 2:05 pm, Jun 15, 2015

Describe Area Affected and Cleanup Action Taken.*

Release of 30 barrels of oil with 20 barrels of oil recovered. Affected area was 113 foot by 143 foot X 2 inch deep on caliche pad. The affected area will be remediated according to NMOCD guidelines.

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		Approved by Environmental Specialist: <i>[Signature]</i>	
Title: LEAD HSE		Approval Date:	Expiration Date:
E-mail Address: jay.c.garcia@conocophillips.com		Conditions of Approval: Site samples required. Delineate and remediate as per MNOCD guides. Geotag photographs of remediation required.	Attached <input type="checkbox"/> 217817 IRP-3670

nKJ1516650966
pKJ1516651415

Date: 01/06/2015

Phone: 575-704-2455

* Attach Additional Sheets If Necessary

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

May 23, 2016

KYLE NORMAN

Basin Environmental Service

P.O. Box 301

Lovington, NM 88260

RE: EVGSAU CTB

Enclosed are the results of analyses for samples received by the laboratory on 05/20/16 14:30.

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: 05/20/2016
Reported: 05/23/2016
Project Name: EVGSAU CTB
Project Number: 1RP-3670
Project Location: NOT GIVEN

Sampling Date: 05/20/2016
Sampling Type: Soil
Sampling Condition: ** (See Notes)
Sample Received By: Brittany Feller

Sample ID: PT. 1 @ 1' (H601109-01)

Chloride, SM4500Cl-B			mg/kg		Analyzed By: AP				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	16.0	05/23/2016	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	693	10.0	05/20/2016	ND	193	96.3	200	1.82	QM-07
DRO >C10-C28	4510	10.0	05/20/2016	ND	202	101	200	6.77	QM-07

Surrogate: 1-Chlorooctane 125 % 35-147

Surrogate: 1-Chlorooctadecane 156 % 28-171

Sample ID: PT. 1 @ 2' (H601109-02)

Chloride, SM4500Cl-B			mg/kg		Analyzed By: AP				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	16.0	05/23/2016	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	05/20/2016	ND	193	96.3	200	1.82	
DRO >C10-C28	155	10.0	05/20/2016	ND	202	101	200	6.77	

Surrogate: 1-Chlorooctane 79.8 % 35-147

Surrogate: 1-Chlorooctadecane 94.7 % 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: 05/20/2016
 Reported: 05/23/2016
 Project Name: EVGSAU CTB
 Project Number: 1RP-3670
 Project Location: NOT GIVEN

 Sampling Date: 05/20/2016
 Sampling Type: Soil
 Sampling Condition: ** (See Notes)
 Sample Received By: Brittany Feller

Sample ID: PT. 2 @ 6" (H601109-03)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	432	16.0	05/23/2016	ND	416	104	400	0.00		
TPH 8015M		mg/kg		Analyzed By: MS						S-06
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	406	100	05/20/2016	ND	193	96.3	200	1.82		
DRO >C10-C28	11400	100	05/20/2016	ND	202	101	200	6.77		

Surrogate: 1-Chlorooctane 135 % 35-147

Surrogate: 1-Chlorooctadecane 287 % 28-171

Sample ID: PT. 2 @ 1' (H601109-04)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	272	16.0	05/23/2016	ND	416	104	400	0.00		
TPH 8015M		mg/kg		Analyzed By: MS						S-06
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	599	100	05/20/2016	ND	193	96.3	200	1.82		
DRO >C10-C28	12700	100	05/20/2016	ND	202	101	200	6.77		

Surrogate: 1-Chlorooctane 160 % 35-147

Surrogate: 1-Chlorooctadecane 316 % 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: 05/20/2016
Reported: 05/23/2016
Project Name: EVGSAU CTB
Project Number: 1RP-3670
Project Location: NOT GIVEN

Sampling Date: 05/20/2016
Sampling Type: Soil
Sampling Condition: ** (See Notes)
Sample Received By: Brittany Feller

Sample ID: PT. 2 @ 1.5' (H601109-05)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	224	16.0	05/23/2016	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	05/20/2016	ND	193	96.3	200	1.82	
DRO >C10-C28	220	10.0	05/20/2016	ND	202	101	200	6.77	

Surrogate: 1-Chlorooctane 92.5 % 35-147

Surrogate: 1-Chlorooctadecane 118 % 28-171

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

S-06	The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.
QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
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



Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

ANALYSIS REQUEST

iges. Please fax written changes to 505-393-2476
corrected 8.30c #54

Appendix C

Photo Documentation

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

Conoco Phillips EVGSAU CTB (1RP-3670)

Unit Letter A, Section 33, T17S, R35E



Initial release, facing south

6/16/2015



Initial release, facing east

6/16/2015



Initial release, facing north

6/16/2015



Initial release, facing west

6/16/2015



Initial release, facing south east

6/16/2015



Initial release, facing north west

6/16/2015



Excavating vertical 1 facing south west

5/20/2016