



**APPROVED**

# CONOCOPHILLIPS

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

Vac Abo #04  
(1RP-3714)

---

## Corrective Action Plan

API No. 30-025-26931

Release Date: July 6<sup>th</sup>, 2015

Unit Letter D, Section 35, Township 17S, Range 35E



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

**May 24<sup>th</sup>, 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 #04 (1RP-3714)  
UL/D sec. 35 T17S R35E  
API No. 30-025-26931**

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 4.1 miles east of Buckeye, New Mexico. The initial C-141 states that the site is located at UL/F Sec. 5 T18S R35E. However, GIS mapping shows the site to be located within UL/D sec. 35 T17S R35E. NM OSE and Basin installed monitor well records indicate that groundwater will likely be encountered at a depth of approximately 57 +/- feet.

On July 6<sup>th</sup>, 2015, CoP discovered a release from a trunk line. A total of 1 barrel of oil and 22.23 barrels of produced water was released over 18,266 sq ft of lease pad and road with 5 barrels of produced water recovered. CoP covered the Highway with base course to soak up the fluid. NMOCD was notified of the release on July 6<sup>th</sup>, 2015, and an initial C-141 was submitted and approved by NMOCD on July 6<sup>th</sup>, 2015 (Appendix A).

On July 6<sup>th</sup>, 2015, Basin personnel were on site to assess the release. On May 3<sup>rd</sup>, 2016 three 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, CoP scraped the release on the lease pad to 6". The release around point 1 will be excavated down to 2.5 ft bgs, the release around point 2 will be excavated down to 3.5 ft bgs. The release around point 3 was scraped to 6". 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



# CONOCOPHILLIPS VACUUM ABO #4

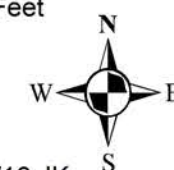
1RP-3714

U/L M & N SECTION 26  
U/L C & D SECTION 35  
T-17-S R-35-E

## Legend

- ▲ SAMPLE POINT
- ELECTRIC POLE
- ▲ PIPELINE MARKER
- ➔ RISER END
- ✕ SOURCE
- ✕ VALVE
- BURIED PIPELINE
- ELECTIRC PANEL (ABD)
- ✕ - ✕ FENCE
- OVERHEAD ELECTRIC LINE
- PAD/ROAD EDGE
- RISER
- SURFACE PIPELINE
- - - 5 FT PIPELINE BUFFER ZONE
- ▨ 6 IN SCRAPE
- ▨ PROPOSED 2.5 FT EXCAVATION
- ▨ PROPOSED 3.5 FT EXCAVATION
- CONCRETE BASE
- STAIN (18266 SQ FT)
- TANK BASE

0 50 100  
Feet



GPS date: 7/06/15 BC, 5/9/16 JK  
5/17/16 KN

Drawing date: 5/24/16  
Drafted by: Brian Cooper, T. Grieco

BUCKEYE ROAD

Vertical 1					Vertical 3				
Depth	CI-	PID	GRO	DRO	Depth	CI-	PID	GRO	DRO
6"	2877	0.1			SS	23346	0		
1'	2514	1.1			6"	2622	0		
1.5'	2129	0.1			1'	730			
2'	1540	0.1			1.5'	358			
2.5'	1238	1			2'	144		<10	90.7
3'	732	0.6							
3.5'	734	0.7							
4'	80	5.4	<10	131					
Vertical 2					Vertical 4				
Depth	CI-	PID	GRO	DRO	Depth	CI-	PID	GRO	DRO
6"	2161	0			SS	520	6.2		
1'	1727	1.1			6"	160	17	<10	35.6
1.5'	1486	1.7							
2'	1702	0.6							
2.5'	1669	1							
3'	1927	1.1							
3.5'	2039	0.7							
4'	855	0.6							
4.5'	886	4.6							
5'	80	3.6	<10	138					
Vertical 5					Vertical 6				
Depth	CI-	PID	GRO	DRO	Depth	CI-	PID	GRO	DRO
SS	173	6.1			SS	173	6.1		
6"	<16	29.5	<10	<10	6"	<16	29.5	<10	<10

Landowner: State; Leased to Lee Cattle Co.  
DGW: 57 FT  
GPS Source: 32.798285, -103.434616

Imagery date: 2/13/14



# 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: <b>ConocoPhillips</b>	Contact: <b>Jay Garcia</b>
Address: <b>29 Vacuum Complex Lane</b>	Telephone No. <b>575-704-2455</b>
Facility Name: <b>Vac Abo # 04</b>	Facility Type: <b>Trunk Line</b>
Surface Owner: <b>NMOCD</b>	Mineral Owner:
API No. <b>30-025-26931</b>	

#### LOCATION OF RELEASE

Unit Letter <b>F</b>	Section <b>05</b>	Township <b>18S</b>	Range <b>35E</b>	Feet from the <b>2286</b>	North/South Line <b>North</b>	Feet from the <b>2080</b>	East/West Line <b>West</b>	County <b>LEA</b>
-------------------------	----------------------	------------------------	---------------------	------------------------------	----------------------------------	------------------------------	-------------------------------	----------------------

Latitude **32.7779083**, Longitude **103.4816513**

#### NATURE OF RELEASE

Type of Release: <b>Spill</b>	Volume of Release: <b>1 BO &amp; 22.23 BPW</b>	Volume Recovered: <b>5 BPW</b>
Source of Release: <b>Trunk line leak.</b>	Date and Hour of Occurrence <b>07/06/2015 5:45 am</b>	Date and Hour of Discovery <b>07/06/2015 5:45 am</b>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <b>Tomas Oberding- NMOCD</b>	
By Whom? <b>Jay Garcia</b>	Date and Hour: <b>07/06/2015 2:30 pm</b>	
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 3:47 pm, Jul 06, 2015

ENV – Agency Reportable – 1 BO & 22.23 BPW – Vac Abo 04 – RR II – MCBU – Buckeye – On Monday July 06, 2015 at 0540 MDT, a release occurred at Vac Abo Battery 4. MSO responded to a trunk line leak resulting in a release of 1 BO and 22.23 BPW with 5 BPW recovered. Immediate action was to shut down wells and facility and close valve to trunk line. A work order has been submitted for repairs. The affected area will be remediated according to NMOCD and COPC and 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.

#### OIL CONSERVATION DIVISION

Signature: <i>Jay Garcia</i>	Approved by Environmental Specialist: <i>[Signature]</i>	
Printed Name: <b>Jay Garcia</b>	Approval Date: <b>07/06/2015</b>	Expiration Date: <b>10/06/2015</b>
Title: <b>LEAD HSE</b>	Conditions of Approval: Site samples required. Delineate and remeadiated as per OCD guides. Please provide geotagged photos of remediation.	Attached <input type="checkbox"/> <b>1RP-3714 217817</b>
E-mail Address: <b>jay.c.garcia@conocophillips.com</b>		
Date: <b>07/06/2015</b>	Phone: <b>575-704-2455</b>	

\* Attach Additional Sheets If Necessary

nTO1518757703

pTO1518936962

# Appendix B

## Laboratory Analysis

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



May 18, 2016

KYLE NORMAN

Basin Environmental Service

P.O. Box 301

Lovington, NM 88260

RE: VAC ABO #4

Enclosed are the results of analyses for samples received by the laboratory on 05/18/16 8:45.

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](http://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 Service  
KYLE NORMAN  
P.O. Box 301  
Lovington NM, 88260  
Fax To: (575) 396-1429

Received: 05/18/2016  
Reported: 05/18/2016  
Project Name: VAC ABO #4  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 05/17/2016  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: PT. 1 @ 4' (H601085-01)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	05/18/2016	ND	416	104	400	3.77	
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	05/18/2016	ND	169	84.4	200	0.716	
DRO >C10-C28	131	10.0	05/18/2016	ND	177	88.3	200	0.925	
Surrogate: 1-Chlorooctane	82.9 %	35-147							
Surrogate: 1-Chlorooctadecane	119 %	28-171							

**Sample ID: PT. 2 @ 5' (H601085-02)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	05/18/2016	ND	416	104	400	3.77	
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	05/18/2016	ND	169	84.4	200	0.716	
DRO >C10-C28	138	10.0	05/18/2016	ND	177	88.3	200	0.925	
Surrogate: 1-Chlorooctane	42.7 %	35-147							
Surrogate: 1-Chlorooctadecane	54.9 %	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: 05/18/2016  
Reported: 05/18/2016  
Project Name: VAC ABO #4  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 05/17/2016  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: PT. 3 @ 2' (H601085-03)**

Chloride, SM4500Cl-B			mg/kg							
			Analyzed By: AP							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>Chloride</b>	<b>144</b>	16.0	05/18/2016	ND	416	104	400	3.77		
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	05/18/2016	ND	169	84.4	200	0.716		
<b>DRO &gt;C10-C28</b>	<b>90.7</b>	10.0	05/18/2016	ND	177	88.3	200	0.925		
<hr/>										
Surrogate: 1-Chlorooctane	72.8 %	35-147								
Surrogate: 1-Chlorooctadecane	93.7 %	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

---

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---

Celey D. Keene, Lab Director/Quality Manager



RUSH

# CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Corrected -8.30

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

#54



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

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May 18, 2016

KYLE NORMAN

Basin Environmental Service

P.O. Box 301

Lovington, NM 88260

RE: VAC ABO #4

Enclosed are the results of analyses for samples received by the laboratory on 05/18/16 8:45.

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Lab Director/Quality Manager



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KYLE NORMAN  
P.O. Box 301  
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Fax To: (575) 396-1429

Received: 05/18/2016  
Reported: 05/18/2016  
Project Name: VAC ABO #4  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 05/04/2016  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: PT. 5 @ 6" (H601086-01)**

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	05/18/2016	ND	416	104	400	3.77	
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	05/18/2016	ND	169	84.4	200	0.716	
DRO >C10-C28	<10.0	10.0	05/18/2016	ND	177	88.3	200	0.925	
Surrogate: 1-Chlorooctane		83.2 %	35-147						
Surrogate: 1-Chlorooctadecane		96.6 %	28-171						

**Sample ID: PT. 4 @ 6" (H601086-02)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	160	16.0	05/18/2016	ND	416	104	400	3.77	
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	05/18/2016	ND	169	84.4	200	0.716	
DRO >C10-C28	35.6	10.0	05/18/2016	ND	177	88.3	200	0.925	
Surrogate: 1-Chlorooctane		75.5 %	35-147						
Surrogate: 1-Chlorooctadecane		93.5 %	28-171						

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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Celey D. Keene, Lab Director/Quality Manager



RASH

**BILL TO**

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



# Appendix C

Photo Documentation

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

# CONOCOPHILLIPS VACUUM ABO #4

UL M & N Section 26 and UL C & D Section 35, T-17-S R-35-E



Source, facing east

7/6/15



Spill down roadway facing east

7/6/15



Vacuuming spill off road

7/6/15



Covering spill area on road with caliche facing east 7-6-15



Installing vertical facing northwest

5/17/16



Backfilling vertical facing northwest

5/17/16



Road facing west

5/3/2016



Road facing east

5/3/2016

