

**REVIEWED**

*By Kristen Lynch at 9:47 am, Sep 02, 2016*

**APPROVED CONDITIONALLY**

*By Kristen Lynch at 9:47 am, Sep 02, 2016*



**Conditions of Approval**

A.) Excavation at Bottom #2 needs to be at 9'. Conformation samples, Sidewall sampling to be completed at 9'.

B.) ALL conformation Samples must include Chlorides, TPH, and BTEX.

C.) Notify NMOCD prior to Sampling to allow opportunity to witness

**CONOCOPHILLIPS**

P.O. Box 2197

Houston, TX 77252-2197

Phone 281.293.1000

**EVGSAU 3202-11**  
(1RP-3951)

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**Corrective Action Plan**

API No. 30-025-26652

Release Date: October 30<sup>th</sup>, 2015

Unit Letter H, Section 32, Township 17S, Range 35E



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

**September 1<sup>st</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 EVGSAU 3202-1 (1RP-3951)  
UL/H sec. 32 T17S R35E  
API No. 30-025-26652**

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 miles southeast of Buck Eye, New Mexico. The initial C-141 states that the site is located at UL/I Sec. 32 T17S R35E. However, GIS mapping shows the site to be located within UL/H Sec. 32 T17S R35E. NM OSE, BLM and Basin installed monitor well records indicate that groundwater will likely be encountered at a depth of approximately 90 +/- feet.

On October 30<sup>th</sup>, 2015, CoP a line strike occurred on a trunk line, the bell hole is at a depth of 7 feet. A total of 54 barrels of oil and 423 barrels of produced water was released over 1,408 sq ft of pasture land. 422 barrels of produced water and 53 barrels of oil was recovered. NMOCD was notified of the release on November 2<sup>nd</sup>, 2015, NMOCD approved the initial C-141 on the same day (Appendix A).

Basin personnel were on site to assess the release November 1<sup>st</sup>, 2015. The release was mapped and photographed (Figure 1). On August 10<sup>th</sup>, 2016 Field samples were collected starting at the base of the 7 foot excavation and taken with depth and samples were collected on the walls of the excavation and representative samples were sent 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 area around bottom point 1 and 2 will be excavated to a depth of 8 feet bgs.

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 caliche and the pasture will be backfilled with clean, imported top soil. The site will be contoured to the surrounding location.

Revegetation of the site will be performed as follows:

Disturbed areas associated with the remediation efforts will be reseeded. If after one growing season the vegetation has not taken hold, seeding may need to be repeated until revegetation is successful. The seed will be spread using a hand-held broadcaster and the area raked or dragged to cover the seed. Because the seed will be broadcast, the pounds per acre will be doubled. BLM #2 LPC seed mix will be used.

The seed mixture will be planted in the amounts specified in pounds of pure live seed (PLS) per acre. Commercially sold seed will be either certified or registered. The area will be seeded following backfilling of the excavated area.

The site will be visited on a quarterly basis to assess the establishment of vegetative growth. Staff personnel performing the site visit will also look for the presence of noxious weeds at the site. If a noxious weed is observed at the site, CoP will determine the most effective manner to eradicate it.

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

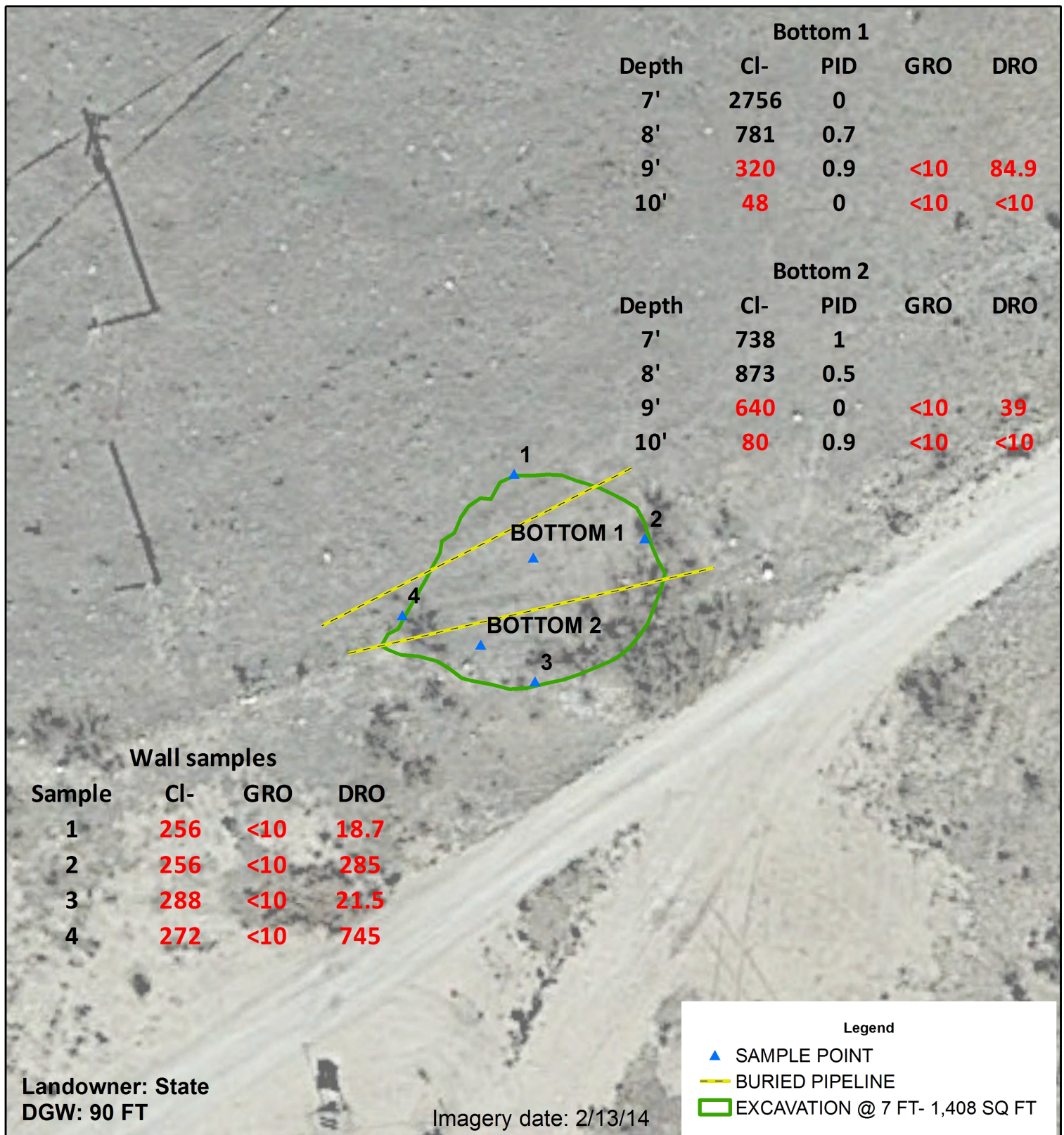
Kyle Norman  
Project Lead  
Basin Environmental Service Technologies  
(575) 942-8542

Attachments:

- Figure 1 – Proposed Excavation
- Appendix A – Initial C-141
- Appendix B – Laboratory Analysis
- Appendix C – Photo Documentation

# Figures

# Initial Sampling



**CONOCOPHILLIPS**  
**EVGSAU 3202-11**

1RP-3951

UL H SECTION 32  
T-17-S R-35-E  
LEA COUNTY, NM

**Figure 1**

GPS: 32.791593 -103.471699

0 10 20  
Feet

GPS date: 8/4/16 JK  
Drawing date: 8/11/16  
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

**RECEIVED**

By JKeyes at 10:28 am, Nov 02, 2015

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>Spencer Cluff</b>
Address: <b>29 Vacuum Complex Lane</b>	Telephone No. <b>575-746-7248</b>
Facility Name: <b>EVGSAU 3202-11</b>	Facility Type: <b>Well</b>

Surface Owner: <b>NMOCD</b>	Mineral Owner: <b>NMOCD</b>	API No. <b>30-025-26652</b>
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### LOCATION OF RELEASE

Unit Letter <b>I</b>	Section <b>32</b>	Township <b>17S</b>	Range <b>35E</b>	Feet from the <b>2600</b>	North/South Line <b>South</b>	Feet from the <b>200</b>	East/West Line <b>East</b>	County <b>LEA</b>
-------------------------	----------------------	------------------------	---------------------	------------------------------	----------------------------------	-----------------------------	-------------------------------	----------------------

Latitude 32.7912865 Longitude -103.4719238 NAD83

### NATURE OF RELEASE

Type of Release: <b>Spill</b>	Volume of Release: <b>477 BBLS</b>	Volume Recovered: <b>475 BBLS</b>
Source of Release: <b>Trunk line</b>	Date and Hour of Occurrence <b>10/30/2015 10:58 am</b>	Date and Hour of Discovery <b>10/30/2015 11:03 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>Jamie Keyes</b>	
By Whom? <b>Spencer Cluff</b>	Date and Hour: <b>11/02/2015 10:10 am</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.\*

Describe Cause of Problem and Remedial Action Taken.\*

On October 30, 2015 at 1058 hrs. MDT, a line strike occurred on the trunk line from EVGSAU Satellite #3 to the EVGSAU CTB near the EVGSAU 3202-11 well that resulted in a release of 54 bbls oil and 423 bbls produced water, with 53 bbls oil and 422 bbls produced water recovered. The immediate action was to shut in EVGSAU Satellite #3 and to isolate the line. A work order has been submitted to repair the line and to remediate the area. The area will be remediated according to NMOCD and COPC guidelines.

Describe Area Affected and Cleanup Action Taken.\*

The immediate action was to shut in EVGSAU Satellite #3 and to isolate the line. A work order has been submitted to repair the line and to remediate the area. The area will be remediated according to NMOCD and COPC 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>Spencer A. Cluff</i>		<b>OIL CONSERVATION DIVISION</b>	
Printed Name: <b>Spencer A. Cluff</b>		Approved by Environmental Specialist: <i>Jamie Keyes</i>	
Title: <b>LEAD HSE</b>		Approval Date: <b>11/02/2015</b>	Expiration Date: <b>01/02/2016</b>
E-mail Address: <b>spencer.a.cluff@conocophillips.com</b>		Conditions of Approval: Discrete site samples required. Delineate and remediate per NMOCD guidelines. Geotagged photos of remediation required.	Attached <input type="checkbox"/> <b>1RP-3951</b>
Date: <b>11/02/2015</b>	Phone: <b>575-746-7248</b>		

\* Attach Additional Sheets If Necessary

nJXK1530637430  
pJXK1530637584

# Appendix B

## Laboratory Analysis

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

September 01, 2016

KYLE NORMAN

Basin Environmental Service

P.O. Box 301

Lovington, NM 88260

RE: EVGSAU 3202-11

Enclosed are the results of analyses for samples received by the laboratory on 08/11/16 11:30.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-16-8. 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: 08/11/2016  
Reported: 09/01/2016  
Project Name: EVGSAU 3202-11  
Project Number: NONE GIVEN  
Project Location: CONOCO PHILLIPS

Sampling Date: 08/10/2016  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: WALL PT. 1 (H601790-01)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	256	16.0	08/11/2016	ND	432	108	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	08/12/2016	ND	193	96.3	200	2.73	
DRO >C10-C28	18.7	10.0	08/12/2016	ND	197	98.4	200	3.77	
Surrogate: 1-Chlorooctane	95.5 %	35-147							
Surrogate: 1-Chlorooctadecane	102 %	28-171							

**Sample ID: WALL PT. 2 (H601790-02)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	256	16.0	08/11/2016	ND	432	108	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	08/12/2016	ND	193	96.3	200	2.73	
DRO >C10-C28	285	10.0	08/12/2016	ND	197	98.4	200	3.77	
Surrogate: 1-Chlorooctane	91.0 %	35-147							
Surrogate: 1-Chlorooctadecane	109 %	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: 08/11/2016  
Reported: 09/01/2016  
Project Name: EVGSAU 3202-11  
Project Number: NONE GIVEN  
Project Location: CONOCO PHILLIPS

Sampling Date: 08/10/2016  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: WALL PT. 3 (H601790-03)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	288	16.0	08/11/2016	ND	432	108	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	08/12/2016	ND	193	96.3	200	2.73	
DRO >C10-C28	21.5	10.0	08/12/2016	ND	197	98.4	200	3.77	
Surrogate: 1-Chlorooctane	94.3 %	35-147							
Surrogate: 1-Chlorooctadecane	106 %	28-171							

**Sample ID: WALL PT. 4 (H601790-04)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	272	16.0	08/11/2016	ND	432	108	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	08/12/2016	ND	193	96.3	200	2.73	
DRO >C10-C28	745	10.0	08/12/2016	ND	197	98.4	200	3.77	
Surrogate: 1-Chlorooctane	97.4 %	35-147							
Surrogate: 1-Chlorooctadecane	141 %	28-171							

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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

Received: 08/11/2016  
Reported: 09/01/2016  
Project Name: EVGSAU 3202-11  
Project Number: NONE GIVEN  
Project Location: CONOCO PHILLIPS

Sampling Date: 08/10/2016  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: PT. 1 BOTTOM @ 9' (H601790-05)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	320	16.0	08/11/2016	ND	432	108	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	08/12/2016	ND	193	96.3	200	2.73	
DRO >C10-C28	84.9	10.0	08/12/2016	ND	197	98.4	200	3.77	

Surrogate: 1-Chlorooctane 94.8 % 35-147

Surrogate: 1-Chlorooctadecane 111 % 28-171

**Sample ID: PT. 1 BOTTOM @ 10' (H601790-06)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	08/11/2016	ND	432	108	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	08/12/2016	ND	193	96.3	200	2.73	
DRO >C10-C28	<10.0	10.0	08/12/2016	ND	197	98.4	200	3.77	

Surrogate: 1-Chlorooctane 89.1 % 35-147

Surrogate: 1-Chlorooctadecane 99.6 % 28-171

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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

Received: 08/11/2016  
Reported: 09/01/2016  
Project Name: EVGSAU 3202-11  
Project Number: NONE GIVEN  
Project Location: CONOCO PHILLIPS

Sampling Date: 08/10/2016  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: PT. 2 BOTTOM @ 9' (H601790-07)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	640	16.0	08/11/2016	ND	432	108	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	08/12/2016	ND	193	96.3	200	2.73	
DRO >C10-C28	39.0	10.0	08/12/2016	ND	197	98.4	200	3.77	

Surrogate: 1-Chlorooctane 85.9 % 35-147

Surrogate: 1-Chlorooctadecane 97.5 % 28-171

**Sample ID: PT 2 BOTTOM @ 10' (H601790-08)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	08/11/2016	ND	432	108	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	08/12/2016	ND	193	96.3	200	2.73	
DRO >C10-C28	<10.0	10.0	08/12/2016	ND	197	98.4	200	3.77	

Surrogate: 1-Chlorooctane 87.7 % 35-147

Surrogate: 1-Chlorooctadecane 91.4 % 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

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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: Conoco Phillips

Project Manager: Kyle Norman

Address:

City: State: Zip:

Phone #: Fax #:

Project #: Project Owner:

Project Name:

Project Location: EUGSA 3220-11-3202-11 \*

Sample Name: Kyle Norman

FOR LAB USE ONLY

Lab I.D.

Sample I.D.

H1001790

1 Wall Pt. 1  
2 Wall Pt. 2  
3 Wall Pt. 3  
4 Wall Pt. 4  
5 Pt. 1 Bottom @ 9 ft.  
6 Pt. 1 Bottom @ 10 ft.  
7 Pt. 2 Bottom @ 9 ft.  
8 Pt. 2 Bottom @ 10 ft.

(G)RAB OR (C)OMP.

# CONTAINERS

GROUNDWATER

WASTEWATER

SOIL

OIL

SLUDGE

OTHER :

ACID/BASE:

ICE / COOL

OTHER :

DATE TIME

Chlorides

TPH 8015 M

BTEX

Texas TPH

Complete Cations/Anions

TDS

BILL TO

ANALYSIS REQUEST

P.O. #: Conoco Phillips

Company: Basin Environmental

Attn:

Address: 419 W. Cain

City: Hobbs

State: NM Zip: 88240

Phone #:

Fax #:

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 the client for the 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 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 services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Relinquished By:

Date:

Received By:

Relinquished By:

Date:

Received By:

Relinquished By:

Date:

Received By:

Relinquished By:

Date:

Received By:

Delivered By: (Circle One)

Sampler - UPS - Bus - Other:

-16.80

Sample Condition  
Cool ☐ Intact ☐  
Yes ☐ Yes ☐  
No ☐ No ☐

CHECKED BY:  
(Initials)

Justin Wright

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

REMARKS:

email results: knorman@basinenv.com;  
jkamplain@basinenv.com; tgrieco@basinenv.com

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

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\*Project name revised as per log. 9/1/16

# Appendix C

Photo Documentation

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

# ConocoPhillips EVGSAU 3202-11

Unit Letter H, Section 32, T17S, R35E



Initial release, facing East

11/1/2015



Initial release, facing West

11/1/2015



Bottom point 1, facing NE

8/10/2016



Bottom point 2, facing SW

8/10/2016