

**REVIEWED**

*By Kristen Lynch at 10:54 am, Oct 24, 2016*

NMOCD  
**APPROVED**  
Corrective Action Plan

Notify NMOCD Prior to Sampling  
to allow witnessing opportunity.

# **ConocoPhillips**

P.O. Box 2197

Houston, TX 77252-2197

Phone 281.293.1000

**Buck Federal CTB**

**(RP-4431)**

**Corrective Action Plan**

**NMLC 068281B**

**Release Date: September 6, 2016**

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

April 28, 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 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 Tuesday the 6th, 2016 at 12:00 am, a release of produced water occurred due to a faulty T joint resulting in the release of 240 BBLs of produced water with 235 BBLs of water recovered. Immediate action was to shut down and replace the T joint. NMOCD was notified of the release on September 6, 2016, and an initial C-141 was submitted (Appendix A).

COP personnel were on site to visually assess the release on September 6<sup>th</sup>. 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, discrete samples will be taken and field tested for chlorides and organic vapors. If the field data indicates that the individual samples 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 will return values below regulatory standards. Five discrete samples will be collected in total. Four surface samples will be collected just outside the berm on all four sides. The fifth sample will be from the center of the spill and will go down as deep as the spill penetrated. The 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  
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>Joseph McLaughlin</b>
Address: <b>3695 Highway 285, Orla TX</b>	Telephone No. <b>806-567-2790</b>
Facility Name: <b>Buck Federal CTB</b>	Facility Type: <b>Central Tank Battery</b>

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

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<b>P</b>	<b>17</b>	<b>26S</b>	<b>32E</b>		<b>North</b>		<b>West</b>	<b>LEA</b>

Latitude **N32°2'14"** Longitude **W103°41'48"**

### NATURE OF RELEASE

Type of Release: <b>Produced Water Spill</b>	Volume of Release: <b>240 BBLS</b>	Volume Recovered: <b>235 BBLS</b>
Source of Release: <b>Produced Water tank over flow (see Lat/Long above).</b>	Date and Hour of Occurrence <b>09/5/2016 10:00 pm</b>	Date and Hour of Discovery <b>09/6/2016 12:00 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, NMOCD Trishia, BLM</b>	
By Whom? <b>Joseph McLaughlin</b>	Date and Hour: <b>09/6/2016 08:15 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.\*☐

Describe Area Affected and Cleanup Action Taken.\*

A 240 BBL Produced Water release occurred on the ConocoPhillips Buck Federal CTB located in Lea County, New Mexico: MSO was making his rounds when he noticed water inside the berm located around the oil and water tanks. When inspecting it more closely, the water was coming from a broken water line located on the filtration line near the filters. MSO shut down the water filtration pumps and closed the line that comes from tanks to the pump. MSO called to notify supervisor and had a water truck vacuum out the produced water from the berm.

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.

<b>Joseph McLaughlin</b>	<u><b>OIL CONSERVATION DIVISION</b></u>	
Signature:	Approved by Environmental Specialist:	
Printed Name: <b>Joseph McLaughlin</b>		
Title: <b>HSE</b>	Approval Date:	Expiration Date:
E-mail Address: <b>Joe.P.McLaughlin@conocophillips.com</b>	Conditions of Approval:	Attached <input type="checkbox"/>

# Appendix B – Photo Documentation



View looking towards the South (9/6/2016)