



June 16, 2020

Bradford Billings  
Hydrologist  
District 2 Artesia  
Oil Conservation Division  
Santa Fe, NM 87505

**Subject: Closure Letter Report  
ConocoPhillips  
1RP-866  
State F-1 Battery Tank Release  
Lea County, New Mexico**

Mr. Billings:

On behalf of ConocoPhillips, Tetra Tech, Inc. (Tetra Tech) submits the following Closure Report for review. The ConocoPhillips State F-1 Battery is located approximately 14.8 miles southwest of Hobbs in Lea County, New Mexico (Figure 1). The State F-1 Facility is located in the Public Land Survey System (PLSS) Unit Letter M, Section 1, Township 21 South, and Range 36 East. The coordinates of the release area (Site) are 32.501118°, -103.226461°.

## BACKGROUND

According to the State of New Mexico C-141 Initial Report (Attachment A), on April 23, 2006, a tank at the State F-1 Battery overflowed due to loss of power to the control panel from a thunderstorm. The overflow led to a release of 21 barrels (bbls) of crude oil. Per the C-141, The SWD pump was put in hand to pump the tank level down and the control panel was repaired. The affected area consisted of the tank and surrounding equipment. All released fluid was reported as contained inside the lined dike. During initial response activities, 15 bbls were recovered. Notice was received by the New Mexico Oil Conservation Division (NMOCD) in May 2006. The NMOCD assigned the release the Remediation Permit number 1RP-866 and the Incident ID nPAC0613139177.

## SITE CHARACTERIZATION

A site characterization was performed and no watercourses, lakebeds, sinkholes, playa lakes, residences, schools, hospitals, institutions, churches, springs, public or private domestic water wells, springs, wetlands, incorporated municipal boundaries, subsurface mines, or floodplains are located within the specified distances. The Site is located in a low karst potential area. Based on data from the New Mexico Office of the State Engineer (NMOSE), there are five water wells within 3,000 meters of the Site. The average depth to groundwater is 136 feet (ft) below ground surface (bgs). The site characterization data is shown in Attachment B.

Based upon the release footprint and in accordance with Subsection E of 19.15.29.12 NMAC, per 19.15.29.11 NMAC, the site characterization data was used to determine recommended remedial action levels (RRALs) for benzene, toluene, ethylbenzene, and xylene (collectively referred to as BTEX), total petroleum hydrocarbons (TPH), and chlorides in soil. Based on the depth to groundwater at the Site, the RRALs for the Site are as follows:

**TETRA TECH**

8911 N. Capital of Texas Hwy, Building 2, Suite 2310, Austin, TX, 78759

Tel 512-338-1667 Fax 512-338-1331 [www.tetrattech.com](http://www.tetrattech.com)

Bradford Billings  
NMOCD  
June 16, 2020

Constituent	RRAL
Chloride (0 – 4 ft bgs)	600 mg/kg
Chloride (>4 ft bgs)	20,000 mg/kg
TPH	2,500 mg/kg
BTEX	50 mg/kg

## INITIAL RESPONSE AND REMEDIAL ACTIVITIES

In accordance with 19.15.29.8. B. (4) NMAC that states “the responsible party may commence remediation immediately after discovery of a release”, ConocoPhillips elected to begin remediation of the impacted area in 2006. Remedial actions included cleaning the tanks and equipment as well as removing the saturated pea gravel within the diked area and replacing it with clean gravel.

## SITE INSPECTION SUMMARY

At the request of ConocoPhillips, Tetra Tech personnel conducted a visual Site Inspection in June 2020 at the release area to assess and evaluate current conditions at the Site. The formerly impacted area was identified from the description in the C-141 (and correspondence with ConocoPhillips) and was corroborated by historical aerial imagery. No staining was noted at the point of release within or surrounding the lined dike. Photographic documentation from the visual assessment is included as Attachment C.

## CONCLUSION

Based on the age of the release, its location inside of a lined dike at a tank battery, and lack of visual impact in surface soils at the Site confirmed by recent visual inspection, ConocoPhillips requests closure for this release. The final C-141 form is enclosed in Attachment A.

Should you have any questions or comments regarding this report, please do not hesitate to contact me by telephone at 512-338-2861 or by email at [christian.llull@tetrattech.com](mailto:christian.llull@tetrattech.com).

Sincerely,



Christian M. Llull  
Project Manager  
Tetra Tech, Inc.

## **FIGURES**



DOCUMENT PATH: D:\CONOCOPHILLIPS\MXD\1RP-4730\FIGURE 1 SITE LOCATION\_1RP-866.MXD



**TETRA TECH**

[www.tetrattech.com](http://www.tetrattech.com)

901 West Wall Street, Suite 100  
Midland, Texas 79701  
Phone: (432) 682-4559  
Fax: (432) 682-3946

**CONOCOPHILLIPS**

1RP-866

(32.501118°, -103.226461°)  
LEA COUNTY, NEW MEXICO

**STATE F-1 BATTERY TANK RELEASE  
SITE LOCATION MAP**

PROJECT NO.: 212C-MD-01796

DATE: JUNE 12, 2020

DESIGNED BY: AAM

Figure No.

**1**

## **ATTACHMENT A C-141 Forms**

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
1301 W. Grand Avenue, 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 October 10, 2003

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

### Release Notification and Corrective Action

#### OPERATOR

☒ Initial Report ☐ Final Report

Name of Company ConocoPhillips Company	Contact John Abney
Address 4001 Penbrook Street Odessa, TX 79762	Telephone No. (505)391-3128
Facility Name State F - 1	Facility Type Oil & Gas Production Battery
Surface Owner ConocoPhillips	Mineral Owner State of New Mexico
Lease No.	

#### LOCATION OF RELEASE

Unit Letter S	Section 1	Township 21 South	Range 36 East	Feet from the	North/South Line	Feet from the	East/West Line	County Lea
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Latitude 32 30.066N Longitude 103 13.559W

#### NATURE OF RELEASE

Type of Release Crude Oil	Volume of Release 21 BBLs	Volume Recovered 15 BBLs
Source of Release Overflow of skim tank	Date and Hour of Occurrence 4/23/06 08:00	Date and Hour of Discovery 4/23/06 9:30
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom? NA	
By Whom? NA	Date and Hour NA	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. NA	
If a Watercourse was Impacted, Describe Fully.* NA		

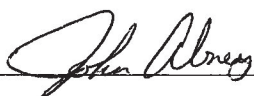
#### Describe Cause of Problem and Remedial Action Taken.\*

The tank overflowed due to loss of power to the control panel from a thunderstorm. The SWD pump was put in hand to pump the tank level down and the control panel was repaired.

#### Describe Area Affected and Cleanup Action Taken.\*

Area affected consisted of the tank and surrounding equipment. All fluid was contained in a lined dike. The tanks and equipment was cleaned and the pea gravel in the dike will be removed and replaced with clean gravel.

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: 		<b>OIL CONSERVATION DIVISION</b>	
Printed Name: John Abney		Approved by District Supervisor:	
Title: SHEaR Specialist	Approval Date:	Expiration Date:	
E-mail Address: john.h.abney@conocophillips.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 04/24/2006	Phone: (505)391-3128		

\* Attach Additional Sheets If Necessary

Facility - PPAC 0613139041  
Incident - NPAC 0613139177

application - PPAC 0613140600

Incident ID	nPAC0613139177
District RP	1RP-866
Facility ID	
Application ID	

## Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

**Closure Report Attachment Checklist:** *Each of the following items must be included in the closure report.*

- ☒ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☐ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☐ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☒ Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Charles R. Beauvais II Title: Environmental Coordinator

Signature: Charles R. Beauvais II Date: 06/16/2020

email: charles.r.beauvais@conocophillips.com Telephone: 575-988-2043

### OCD Only

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: Brittany Hall Date: 3/28/2023

Printed Name: Brittany Hall Title: Environmental Specialist

**ATTACHMENT B**  
**Site Characterization Data**



# New Mexico Office of the State Engineer

## Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

(R=POD has been replaced, O=orphaned, C=the file is closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest)

(NAD83 UTM in meters)

(In feet)

POD Number	POD Code	Sub-basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	Distance	Depth Well	Depth Water	Water Column
<a href="#">CP 00685 POD1</a>	CP	LE		2	3	4	11	21S	36E	666038	3595997*	1487	220		
<a href="#">CP 00690</a>	CP	LE		4	4	03	21S	36E	664706	3597487*	1912	340			
<a href="#">CP 00877</a>	CP	LE					06	21S	37E	668920	3598153*	2434	150	73	77
<a href="#">CP 00986 POD1</a>	CP	LE		4	3	4	06	21S	37E	669110	3597437	2496	154		
<a href="#">CP 00734</a>	CP	LE			1	10	21S	36E	663713	3596862*	2945	215	200		15

Average Depth to Water: **136 feet**

Minimum Depth: **73 feet**

Maximum Depth: **200 feet**

Record Count: 5

### UTMNAD83 Radius Search (in meters):

**Easting (X):** 666614.914

**Northing (Y):** 3597368.304

**Radius:** 3000

\*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

6/12/20 8:12 AM

Page 1 of 1

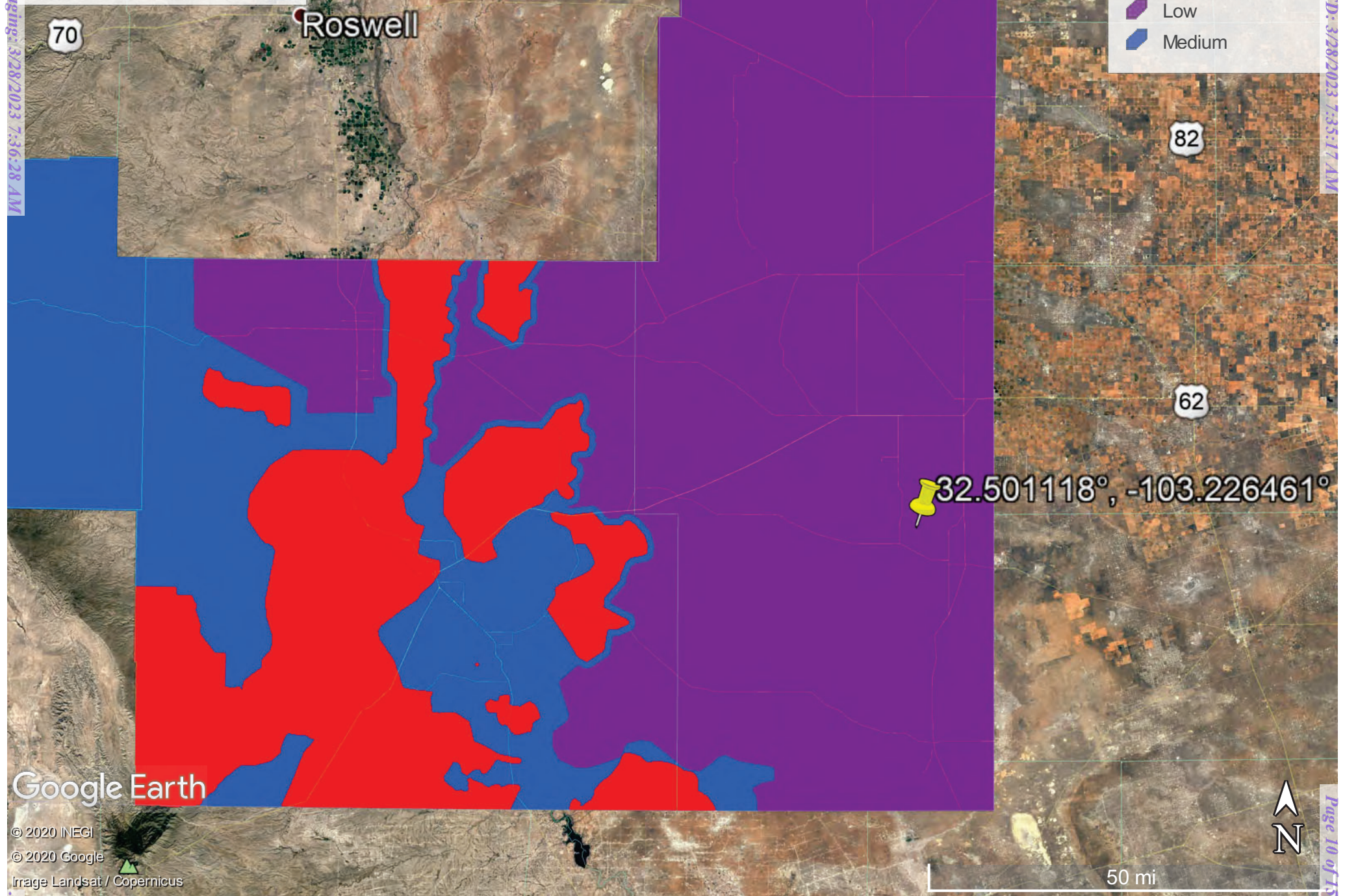
WATER COLUMN/ AVERAGE  
DEPTH TO WATER

# Karst Potential

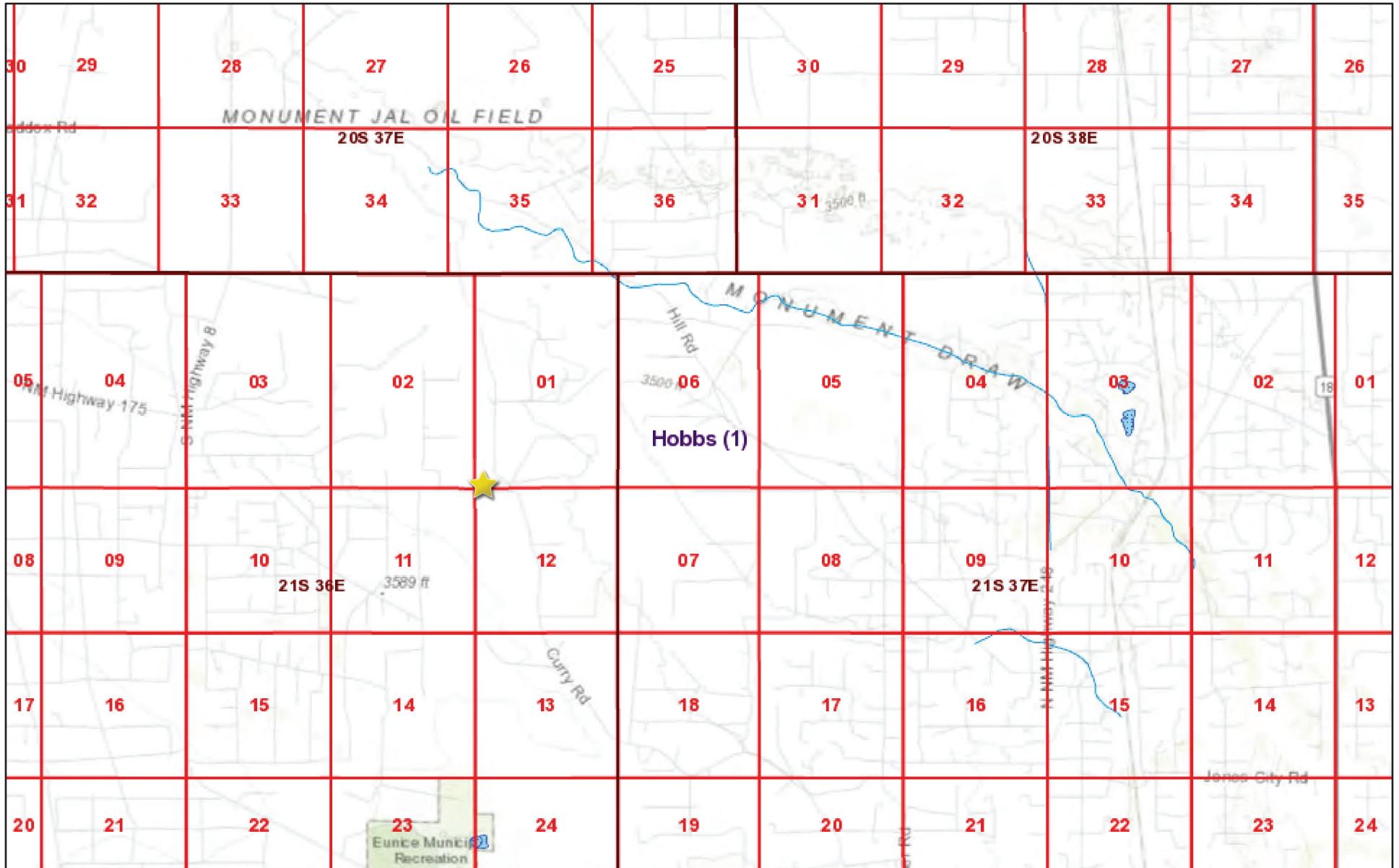
State F-1 Battery Tank Release  
1RP-866

## Legend

-  State F-1 Battery
-  High
-  Low
-  Medium



# Water Bodies



6/11/2020, 6:12:35 PM



Override 1



OCD District Offices



PLSS Townships



PLJV Probable Playas



OCD Districts



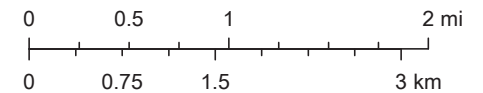
PLSS First Division



OSE Water-bodies



OSE Streams



Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS,

New Mexico Oil Conservation Division

NM OCD Oil and Gas Map. <http://nm-emnrd.maps.arcgis.com/apps/webappviewer/index.html?id=4d017f2306164de29fd2fb9f8f35ca75>: New Mexico Oil Conservation Division

**ATTACHMENT C**  
**Photographic Documentation**



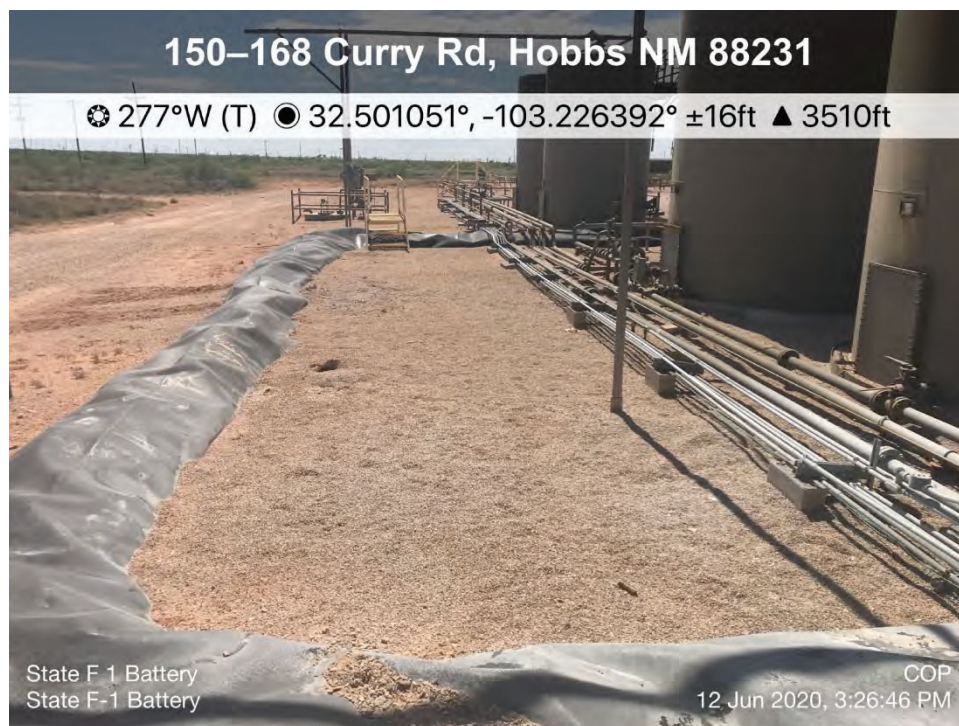
TETRA TECH, INC. PROJECT NO. 212C-MD-01796-20	DESCRIPTION	View of site signage. Site Coordinates: 32.501188, -103.226553.	1
	SITE NAME	State F-1 Battery Tank Release	6/12/2020



TETRA TECH, INC. PROJECT NO. 212C-MD-01796-20	DESCRIPTION	View of clean gravel inside of lined, bermed area.	2
	SITE NAME	State F-1 Battery Tank Release	6/12/2020



TETRA TECH, INC. PROJECT NO. 212C-MD-01796-20	DESCRIPTION	View of clean gravel inside of lined, bermed area.	3
	SITE NAME	State F-1 Battery Tank Release	6/12/2020



TETRA TECH, INC. PROJECT NO. 212C-MD-01796-20	DESCRIPTION	View of clean gravel inside of lined, bermed area.	4
	SITE NAME	State F-1 Battery Tank Release	6/12/2020

**District I**  
1625 N. French Dr., Hobbs, NM 88240  
Phone:(575) 393-6161 Fax:(575) 393-0720  
**District II**  
811 S. First St., Artesia, NM 88210  
Phone:(575) 748-1283 Fax:(575) 748-9720  
**District III**  
1000 Rio Brazos Rd., Aztec, NM 87410  
Phone:(505) 334-6178 Fax:(505) 334-6170  
**District IV**  
1220 S. St Francis Dr., Santa Fe, NM 87505  
Phone:(505) 476-3470 Fax:(505) 476-3462

**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

CONDITIONS  
  
Action 201287

CONDITIONS

Operator: CONOCOPHILLIPS COMPANY 600 W. Illinois Avenue Midland, TX 79701	OGRID: 217817
	Action Number: 201287
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

Created By	Condition	Condition Date
bhall	None	3/28/2023