March 27, 2020 Page 1



March 27, 2020

Mr. Brad Billings New Mexico Oil Conservation Division 1220 South St. Francis Drive, Santa Fe, New Mexico 87505

Re: MCA Battery #1 Trunkline Leak Event Date: October 19, 2004 Lea County, New Mexico Order #: 1RP-734

Dear Mr. Billings,

This letter provides a summary of the scope, activities and results for the remediation, Reclamation, and Restoration of the site referred to as the MCA Battery #1 Trunkline Leak which occurred on October 19, 2004, hereinafter referred to as the "Site".

#### **Desktop Review**

- ✓ Spill GPS Location: 32.811182, -103.791127; Sect 29, T 17 S, R 32
- ✓ The original State of New Mexico Oil Conservation District C-141 Spill form for initial reporting of the loss states that 90 barrels of produced water were released, and 80 barrels were recovered. The 10 barrels not recovered effected an area 30 feet by 55 feet in a dry sandy pasture. The form states that the site will be sampled, and a cleanup action will be submitted for approval at a later date. A copy of the C-141 and the Closure request forms are included in Attachment A.
- ✓ The Oil Conservation Division Permitting Spill Search Form states that no waterway was affected, and no groundwater impacted. Depth to groundwater is listed at 90 feet. A copy of the online report is shown in Attachment B.
- ✓ The MCA BTRY #1 Trunkline Release Report (BCC International, 11/4/2004) states that a reduction of chlorides is noted from 3 feet to 25 feet. Soil lithology at the site consists of caliche and sandstone near the surface. The report states that based on this lithology, migration to groundwater is unlikely and only surface remediation is necessary. The report is included in Attachment C. Additionally, the Report states that a boring was advanced to a depth of 138 feet without encountering water.
- ✓ A review of past and present aerial photographs shows that the release what appears to be typical vegetation in the release area.

#### Site Location Map

- ✓ A site location map shows the aerial view with the approximate location of the impacted area based on the C-141 report. The Site Location Map is shown in **Figure 1** below.
- ✓ Review of area photos that pre-date the release and those subsequent to the release date show no difference or impact from this release, nor evidence of remediation.



Site Radius Map

- ✓ A site radius map shows the aerial view within a ½ mile radius of the release point and is shown in Figure 2 below.
- ✓ Review of aerial photos that pre-date the release and those subsequent to the release date show no impact from this release.

Aerial TOPO radius view of impacted area

✓ The TOPO radius view does not indicate any water bodies or courses in the ½ mile radius. The TOPO radius map is shown in **Figure 3** below.

New Mexico Site Assessment/Characterization questions from Attachment C, page 3 of new C-141 form

✓ A copy of the results is shown in Attachment D below. The release is not expected to have impacted groundwater which is present at a depth of greater than 138 feet. No other water bodies are located within the regulated distances specified on Attachment D of Form C 141. No residences, schools, hospitals, institutions or churches are located within the regulated distance.

#### Summary of Findings

Based on aerial imagery of the release area, no surface impacts migrated off the pipeline right of way. Initial remediation recovered 80 of 90 barrels of produced water. Chloride levels are confirmed to be decreasing from 3 feet to 25 feet in depth. Lithology consists of caliche and sandstone. The estimated depth to groundwater is greater than 138 feet. Therefore; Apex respectfully requests, on behalf of Conoco Phillips, a finding of no further action.

If you have any questions about this letter or require anything further, please feel free to call either of the undersigned at (432) 695-6016.

Sincerely,

Clut Ward

Clint Ward Project Manager

A. W. Robuell

Hank W. McConnell Branch Manager



#### Attachments:

- A: Original State of New Mexico Oil Conservation District C-141 Spill form
- B: State of New Mexico Oil Conservation online report
- C: MCA BTRY #1 Trunkline Release Report (BCC International, 11/4/2004)
- D: C-141 Page 3 Site Assessment/Characterization

#### Figures:

- 1. Site Location Map
- 2. Site Radius Map
- 3. TOPO radius Map

March 27, 2020

Page 1



## Attachment A

## Original State of NMOCD C-141 Spill and Closure

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

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#### 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 Kenneth N. Andersen	1	
Address 4001 Penbrook, Odessa, TX 79762	Telephone No. 505.676.2371.55	69	
Facility Name MCA Unit Btry # 1	Facility Type Oil and Gas		

Surface Owner BLM

Type of Release

**Produced Water** 

Mineral Owner BLM

Lease No LC - 029410A

Volume Recovered

(0 oil, 80 water)

#### LOCATION OF RELEASE

Unit Letter E	Section 29	Township 17S	Range 32E	Feet from the 1395	North/South Line North	Feet from the 1295	East/West Line West	County Lea Co., NM	
------------------	------------	-----------------	--------------	--------------------	---------------------------	--------------------	------------------------	-----------------------	--

Latitude 32.81186N Longitude 103.79115W

E DEL EACE

### NATURE OF RELEASE

90 bbl (0 oil, 90 water)

Source of Release	Date and Hour of Occurrence	Date and Hour of Discovery
MCA Btry #14" fiberglass produced water transfere	10/19/04 @ 1330hrs	10/19/04 @ 1400hrs
trunk line ~ 400 yrds NNE of MCA # 369.		
Was Immediate Notice Given?	If YES, To Whom?	
🛛 Yes 🗌 No 🗋 Not Required	Silvia Dickey	
By Whom? Ken Andersen	Date and Hour 10/20/04 @ 1100hrs	
Was a Watercourse Reached?	If YES, Volume Impacting the Watercours	e.
🗋 Yes 🛛 No		
If a Watercourse was Impacted, Describe Fully.*		
Describe Cause of Problem and Remedial Action Taken.*		
The spill was caused by the dresser sleave bolts corrodin	g allowing the sleave to come apart an	d start leaking. The sleave was

removed and a collar and flange where installed.

Describe Area Affected and Cleanup Action Taken.\*

30 ftX55ft of dry sandy grass pasture with no cows present. The site will be sampled and a clean up action will be submitted for approval at a later date.

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.

		(7/11/01/1	DIVISION
Signature:			
Printed Name: Kenneth N Andersen	Approved by District Supervisor:	_	
Title: SHEaR Specialist	Approval Date:	Expiration D	Date:
E-mail Address: ken.n.andersen@conocophillips.com	Conditions of Approval:		Attached
Date:         10/20/04         Phone:         505.676.2371.5569           Attach Additional Sheets If Necessary			[

Attach Additional Sheets If Necessary

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Page 6

Oil Conservation Division

Incident ID	
District RP	1RP-734
Facility ID	
Application ID	

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### 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.
$\mathbf{X}$ A scaled site and sampling diagram as described in 19.15.29.	11 NMAC
Photographs of the remediated site prior to backfill or photographs be notified 2 days prior to liner inspection)	s of the liner integrity if applicable (Note: appropriate OCD District office
Laboratory analyses of final sampling (Note: appropriate OD	C District office must be notified 2 days prior to final sampling)
Description of remediation activities	
and regulations all operators are required to report and/or file certa may endanger public health or the environment. The acceptance o should their operations have failed to adequately investigate and re human health or the environment. In addition, OCD acceptance of	ations. The responsible party acknowledges they must substantially onditions that existed prior to the release or their final land use in OCD when reclamation and re-vegetation are complete.
email: g.fejervary@conocophillips.com	Telephone: 432-210-7037
OCD Only	
Received by:	Date:
Closure approval by the OCD does not relieve the responsible party	y of liability should their operations have failed to adequately investigate and water, human health, or the environment nor does not relieve the responsible
Closure Approved by:	Date:
Printed Name:	Title:





Attachment B

Original State of New Mexico

Oil Conservation Online report

#### ATTACHMENT B

#### State of New Mexico Oil Conservation online report

Incident Number	Facility	Facility Name	API	Well	OGRID	Operator Name	Severity	Incident Type	Lease Type	Spill Referrer	Incident Date	Notification Date	Final Report Date	Material Spilled	Volume Spilled
nPAC0605529572	fPAC0605529397	ConocoPhillips MCA 1 Trunkline Leak			217817	CONOCOPHILLIPS COMPANY	Major	Produced Water Release	Federal	Industry Rep	10/19/2004	10/19/2004		Produced Water	90

Volume Recovered	Volume Lost	Unit Of Volume	Spill Cause	Spill Source	District	County	ULSTR	OCD Unit Letter	Section	Township	Range	Latitude	Longitude	Waterway Affected	Ground Water Impact	Ground Water Depth
80	10	BBL	Equipm ent Failure	Pipeline (Any)	Hobbs	Lea (25)	-29-17S- 32E		29	175	32E	32.81186	-103.79115	No	No	90





## Attachment C

## MCA BTRY #1 Trunkline Release Report

(BCC International, 11/4/2004)



### #3 CONOCOPHILLIPS

## MCA Battery 1 Trunkline Leak (10-19-04)

ENVIRONMENTAL SITE INVESTIGATION

PERFORMED BY:

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/21/2023 11-53:00

**BBC INTERNATIONAL, INC.** WORLD-WIDE ENVIRONMENTAL SPECIALISTS 1324 W. MARLAND BLVD. P. O. BOX 805 HOBBS, NEW MEXICO 88240 (505)397-6388 • FAX (505)397-0397 EMAIL: bbc@bbcinternational.com WEBSITE: www.bbcinternational.com

November 4, 2004

PREPARED FOR:

**MR. KEN ANDERSEN** CONOCOPHILLIPS P.O. BOX 180 MALJAMAR, NEW MEXICO 88264-0180

Conoco 4

hillipo -217817 application - pPAC0605529769 - FPAC0605529397 inspect - ePAC0605529522 K - nPAC0605529572



PHONE (505) 397-6388 • FAX (505) 397- 0397 • 1324 W. MARLAND • P.O. BOX 805 • HOBBS. NM 88241-0805 E-MAIL: bbc@bbcinternational.com

December 2, 2004

Paul Sheeley NM Oil Conservation Division 1625 N. French Drive Hobbs, NM 88240

#### RE: ConocoPhillips – MCA Battery 1 Trunkline Leak (10-19-04) Unit Letter E, Section 29, Township 17 South, Range 32 East

Dear Mr. Sheeley:

BBC International, Inc. respectfully submits this site investigation report for the MCA Battery 1 Trunkline Leak on behalf of ConocoPhillips.

This site is an area that was investigated due to a trunkline leak that occurred on October 19, 2004. Approximately 90 barrels of produced water was released with 80 barrels of water recovered.

The investigation and sampling was conducted on October 27, 2004. The data indicates that the area of greatest contamination is in the upper portion of the leak area. Since the depth to groundwater is approximately 90 feet and there is a hard layer at approximately 25 feet below ground surface, it is recommended that three feet of topsoil be removed and disposed of, and a one foot thick clay or 40 mil poly liner be installed. The excavated area would be backfilled with clean topsoil, re-seeded with appropriate BLM seed, and closed.

I look forward to your review of this report and the agreement to our recommendation. If you have any questions, please do not hesitate to contact me at (505)397-6388, by email at <u>kswinney@bbcinternational.com</u>, or at the address above.

Sincerely,

**BBC** International, Inc.

Ken Swinney, CEI, CRS Director of Operations

KS:jg

encl.

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### NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON Governor Joanna Prukop Cabinet Secretary Mark E. Fesmire, P.E. Director Oil Conservation Division

January 6, 2005

Ken Anderson Conoco Phillips 29 Vacuum Complex Rd. Lovington, NM 88260

Re: Work Plan Approval MCA unit battery #1 Dated: 12-02-04 UL-E, Sec 29-T17S-R32E

The remediation closure referenced above and submitted to the New Mexico Oil Conservation Division (OCD) for ConocoPhillips by BBC is hereby approved according to the information provided. ConocoPhillips must delineate the horizontal perimitter and submit a sketch or draft of the liner and dimensions accordingly.

Please be advised that OCD approval of this plan does not relieve ConocoPhillips of liability should their operations fail to adequately investigate and remediate contaminants that threaten ground water, surface water, human health or the environment. In addition, OCD approval does not relieve ConocoPhillips of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions or need assistance please write or call: (505) 393-6161, ext. 113, or e-mail: <u>psheeeley@state.nm.us</u>

Sincerely,

Received by OCD: 4/21/2023 11:53:06 AM

Paul Sheeley-Environmental Engineer Cc: Roger Anderson - Environmental Bureau Chief Chris Williams - District I Supervisor William Olson - OCD Hydrologist Larry Johnson - Environmental Engineer Ken Swinny - BBC

## ConocoPhillips MCA Battery 1 Trunkline Leak 10-19-04

#### **1.0 INTRODUCTION**

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The subject site is located south of Maljamar, New Mexico in Unit-Letter-E, of Section\_29, Township=17 South, and Range-32 East. The site consists of undeveloped rangeland and petroleum production facilities. On October 19, 2004, a 4" fiberglass trunkline leaked approximately 90 bbls of water with approximately 80 bbls of water being recovered.

#### 2.0 SITE CHARACTERIZATION

The leak area measures approximately 61\_feet by 49 feet with a smaller area that measures approximately 19 feet by 24 feet. A sketch of the leak area including the sample points can be reviewed in Appendix II of this report. The surface soil is red sand. There is no water source within 1,000 feet of the site. There is no surface water within 1,000 feet of the site. Based on data from the ground water monitoring well located at the Maljamar Plant, depth to ground water is approximately 90 feet.

#### 3.0 SITE INVESTIGATION ACTIVITIES

On October 27, 2004, BBC personnel conducted an inspection of the site. A soil boring was drilled near the center of the leak area using BBC's tractor mount drilling rig, to a total depth of 25 feet. Seven samples were taken from the soil boring; one each at one foot, three feet, five feet, ten feet, fifteen feet, twenty feet, and twenty-five feet. The samples were taken to Cardinal Laboratories for chloride analysis. Laboratory analysis for SB1 @ 1' is 9997 ppm chloride, 3' is 11,676 ppm chloride, 5' is 8477 ppm chloride, 10' is 9197 ppm chloride, 15' is 7598 ppm chloride, 20' is 5358 ppm chloride, and 25' is 3519 ppm chloride. The laboratory report for the analysis is located in Appendix I of this report. The soil boring location can be viewed on the site diagram in Appendix II of this report. Site photographs can be viewed in Appendix III.

Two near surface samples were taken; one from the north end of the leak area and one from the south end of the leak area. The samples were taken at a depth of one foot and were taken to Cardinal Laboratories for chloride analysis. Laboratory analysis for Sample Point1-1' is 2799 ppm chloride. Laboratory analysis for Sample Pont 2-1' is 3199 ppm chloride. Laboratory analytical results for this sampling event can be reviewed in Appendix I of this report. The location of the sample points can be viewed on the site diagram in Appendix II of this report.

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#### 4.0 CONCLUSION AND RECOMMENDATION

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The laboratory data for this site indicates a reduction in chloride concentrations from three feet to twenty-five feet. At three feet the chloride concentration is 11,676 ppm and at twenty-five feet the chloride concentration is 3519 ppm, this reduction is significant. Taking into consideration that the depth to groundwater is greater than 75 feet, and the subsurface lithology at the site consists of caliche and sandstone layers, the evidence indicates that migration of chlorides to groundwater is unlikely. Therefore, it is recommended that approximately 3 feet of topsoil, be removed and disposed of. This soil would be transported to an OCD approved landfarm or disposal site. A one foot thick compacted clay or 40 mil poly liner would then be installed. The excavated area would be backfilled with clean topsoil and reseeded with the appropriate BLM seed mix and the site would be closed.

by OCD: 4/21/202.

## ConocoPhillips

Permian Basin Asset

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Lease: MCA Unit Btry # 1			LC - 029410A C, State, or Federal)		Field: Maljar	nar		
Discovered By: Kevin McNAbb			Date and Time Disc		19/04 @ 14001	ırs		
Date and Time Discharge Began: 1	0/19/04@1330	hrs	Date and Time Disc	harge Ende	d: 10/19/04@	1415hrs		
and the second s			inge 32E County/St	ate Lea Co	., NM			
Latitude 32.81186N Longitude	103.79115W							
Highway Map Location: Go S from	m the Maljamar	fire station on C	CR 126 3.3 miles, tu	n W on dir	t road & go 2.	7 miles, the	n N 100ft to le	ak.
Location Of Discharge: 400 yard			Flowline	F	eet to Nearest	Wellhead Nu	mber	
			Injection Lir		eet to Nearest	Wellhead Nu	mber	
Specific Source of Discharge: MC				re trunk lin	c.			
Describe Cause of Discharge : Dro			1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.			890		
Actions taken to Prevent Reoccurre			and the second	and the second second second				
Describe Nature and Extent of Are	and the second second	(55ft of dry sand	ly grass pasture wit	h no cows p	oresent.			
Weather Conditions: Clear Cal								
Clean-Up Action Taken: Picked u	Company and a lot of	duced water.	·					
Remediation Action Taken: Will 1 Specific Source of Discharge					ons For Failu	14 14 14 14 14 14 14 14 14 14 14 14 14 1		
Tank Piping		ge Container tion Equipment Communication		] External ] Internal ] Fatigue ] Age		essure atrumentation echanical eather of Cleanup/H	Repair: <b>\$3,00</b>	0.00
Pipe Size = 4 inches         Steel       Image: Burner Steel         Fiberglass       Surner Steel         Plastic       Image: Barner Steel         Transite       Image: Steel	face	Coated Internal External Cement Lined	<ul> <li>Plastic L</li> <li>Fiberglas</li> <li>Was Lind</li> <li>Other</li> </ul>	Contraction of the second s	y Treated			
Names and Volumes of Substance	es Spilled	Remedial Action	on Picked Up					and the second
0 BBL Oil 90 BBL Produced Wa	ater	0 BBL Oil 80	BBL Produced Wate	r	Contai	ned in Dike?	TYes	No No
Gallons Chemical Spilled	_	Gallons	Chemical		MFG/0	Chemical Na	ne:	_
Gas Volume Released (MC	CF)	Gas Leak	Blowdown	Upset Upset				
Other - Explain:		_		_				
Federal, State, and Local Agenci	es Notified:		en sonaid		Job Number			
Agency	Person Noti	fied	Date and Time		Method			Notifying
NMOCD Silvia D	lickey		10/20/04 @ 1100	)hrs	Phone Phone	Fax	Ken Ander	sen
BLM Paul E	vans		@		Phone	Fax		
BLM Jim An	nos		10/20/04 @ 1210	hrs	A Phone	🗆 Fax	Ken Ander	sen
Landowner/Tennant: BLM					Telephone No	505.393.3	612	
TTreacher Courties min and			Wa and adam					
I Hereby Certify That The Above In	formation Is True	To The Best Of M	y Knowledge.					
Name and Title: Kevin McNabl		To The Best Of M	y Knowledge.	uites				1

## **Appendix I**

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S. SPACE STREET



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PHONE (915) 873-7001 . 2111 BEECHWOOD . ABILENE, TX 79603

PHONE (505) 393-2328 . 101 E. MARLAND . HOBBS, NM 88240

ANALYTICAL RESULTS FOR BBC INTERNATIONAL, INC. ATTN: CLIFF BRUNSON P.O. BOX 805 HOBBS, NM 88241 FAX TO: (505) 397-0397

Receiving Date: 10/28/04 Reporting Date: 10/28/04 Project Owner: CONOCO PHILLIPS Project Name: MCA BATTERY 1 4" TRUNKLINE Project Location: MALJAMAR, NM

Analysis Date: 10/28/04 Sampling Date: 10/27/04 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: BC Analyzed By: AH

LAB NUMBER

SAMPLE ID

(mg/Kg)

CL

Relative Perce	nt Difference	6.0
% Recovery		106
True Value QC	<u>}</u>	1000
Quality Contro		1080
H9291-9	SAMPLE PT. 2-1'	3199
H9291-8	SAMPLE PT. 1-1'	2799
H9291-7	SB1 @ 25'	3519
H9291-6	SB1 @ 20'	5358
H9291-5	SB1 @15'	. 7598
H9291-4	SB1 @ 10'	9197
H9291-3	SB1 @ 5'	8477
H9291-2	SB1 @ 3'	11676
H9291-1	SB1 @ 1'	9997

METHOD: Standard Methods

4500-CIB

PLEASE NOTE: Liability and Damegers. Cerdiner's Bability and client's exclusive remedy for any claim arking, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whataoever shall be deemed waived unless made in writing and received by Cerdinel within thirty (30) days after completion of the applicable service. In one overs thall Cerdinel be table for incidential or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profils incurred by client, its subcidevies, affiliates or successors arking out or releved to the performance of services bergunder by Cerdinel, regardless of whether such claim is based upon any of the above-stated reasons or otherwise. affiliates or successors artsing out of or relation H9291

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST		ANALYSIS REQUEST																					Terran and Onederant likewid with a drapped on at sectors more than N days partition at the rate of 20% per sector fan the stephed date of franks,		LI Yes LI No Add'I Phone 8: LI Yes LI No Add'I Fax 8:				بر تير	
CHAIN-OF-CI	2, East Marland, Hobbs, NM 88240 5) 393-2326 Fax (505) 393-2476	BILLTO	月0.米	Company:	Attn: D	Address:	chy:	Stato: Zip:	Phone #:		PRESERV SAMPLING	ः ाठव ःद्राङा		1	V 10-17-01 10:02 5	V and long V	13:01	11:30	11:2710-17-01	10-11-01	1 15.01 Ka-11-40 1/1	1 1-41-01 11-02 ×	ort what he brind to the around p	al les, et åres på frakte insærted by dåred, ha ædsektionfra. seed upon any af åts abore stilled freestare at Offenhåts.	Phona Result: Fay Result	REMARKS		A Car	, 	40
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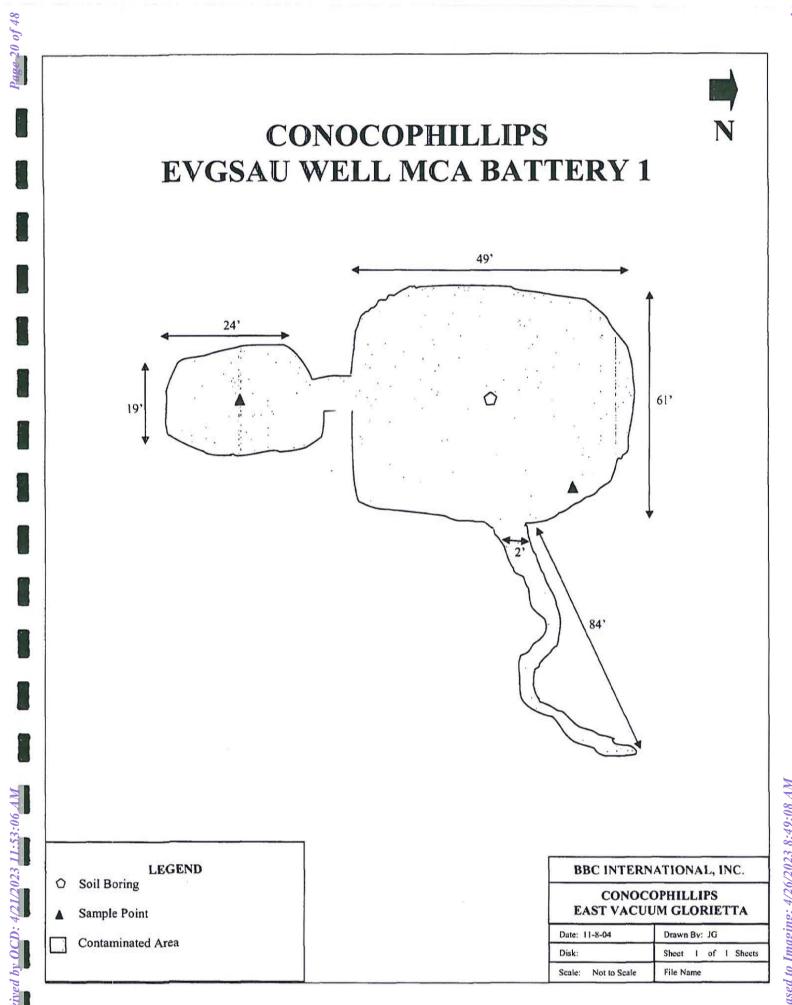
## Appendix II

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## Appendix III

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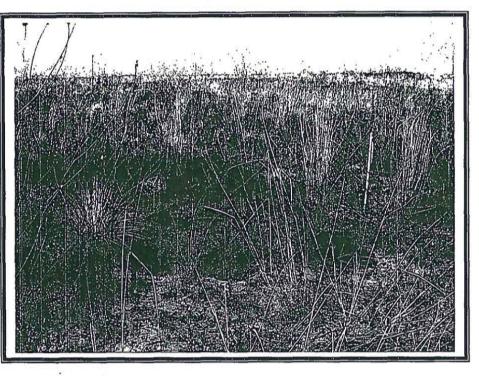
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MCA Battery 1 Trunkline Leak







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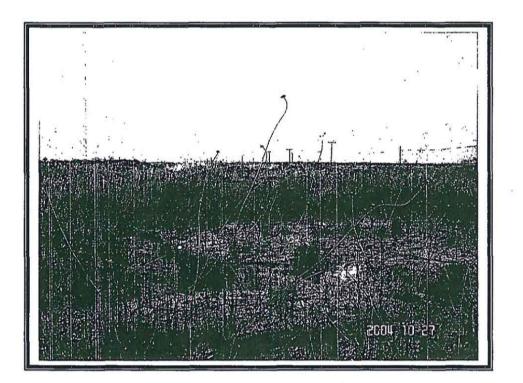
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MCA Battery 1 Trunkline Leak







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MCA Battery 1 Trunkline Leak







## **CONOCOPHILLIPS**

## **MCA BATTERY 1 TRUNKLINE LEAK**

ENVIRONMENTAL SITE INVESTIGATION

PERFORMED BY:

/2023

BBC INTERNATIONAL, INC. WORLD-WIDE ENVIRONMENTAL SPECIALISTS 1324 W. MARLAND BLVD. P. O. BOX 805 HOBBS, NEW MEXICO 88240 (505)397-6388 • FAX (505)397-0397 EMAIL: bbc@bbcinternational.com WEBSITE: www.bbcinternational.com

AUGUST 23, 2005

PREPARED FOR:

MR. KEN ANDERSEN CONOCOPHILLIPS P.O. BOX 180 MALJAMAR, NM 88264-0180



## ConocoPhillips MCA Battery 1 Trunkline Leak (10-19-04)

#### **1.0 INTRODUCTION**

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4/21/2023 11:53:06 4

On July 18, 2005 Ken Swinney and Cliff Brunson of BBC International, Inc. (BBC) met with Paul Sheeley of the New Mexico Oil Conservation Division (NMOCD) to discuss a surface remediation closure plan for the ConocoPhillips MCA Battery 1 Trunkline site in lieu of the excavation/liner plan approved by the NMOCD on January 6, 2005.

The purpose of the meeting was to discuss the potential of exploring for a subsurface naturally-occurring impermeable barrier at the site that would serve as a protection barrier to groundwater instead of the use of a geosynthetic liner that had been previously approved. In addition, if a barrier was found or no groundwater was encountered within 100 feet of the surface, then a surface remediation plan would be proposed instead of excavation, disposal, and installation of a geosynthetic liner that had been previously proposed and approved.

Mr. Sheeley stated that a naturally occurring impermeable barrier could be used if it were above groundwater, and of sufficient area and thickness. Mr. Sheeley also stated that a barrier may not be required if there were no groundwater to protect. The requirement for "no groundwater to protect" would be a soil boring drilled to at least 100 feet below ground surface (bgs) that does not encounter groundwater. Vertical delineation of the site to 250 ppm of chloride would also be required.

#### 2.0 SITE INVESTIGATION ACTIVITIES

On August 3, 2005, BBC personnel mobilized to the site with an air rotary drilling rig and equipment to drill and sample the site. The objectives of the investigation were to determine the existence of a naturally occurring impermeable barrier of sufficient area and thickness, to vertically delineate the site to 250 ppm chlorides, and to determine if groundwater is present at the site. A soil boring was advanced to 138 feet bgs and samples were taken at 5' intervals. The samples were screened using field chloride titration analysis. All samples from 5' to 70' and the bottom sample at 138' were taken to Cardinal Laboratories for chloride analysis.

Mr. Steven Bond, BBC's geologist, was on location for the entire drilling operation to determine if a natural impermeable barrier exists at the location and

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if groundwater is present. No evidence of an impermeable barrier was encountered in the soil boring and Mr. Bond stated in his "Summary of Test Boring MCA Battery1 injection line leak" that: It is unlikely that a saturated zone (groundwater) will be encountered in the Dockum Group. The geologist summary and soil boring log can be reviewed in Appendix I. The laboratory analysis reports can be reviewed in Appendix II.

#### 3.0 CONCLUSION AND RECOMMENDATION

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Although no evidence of a naturally occurring impermeable barrier was found, groundwater also was not found, and laboratory analysis shows that the chloride impact drops to 768 ppm at 35' bgs and to 176 ppm at 50' bgs. Therefore, BBC concludes that an excavation and liner installation is not warranted at this site.

Due to the sensitivity of this site as a dune lizard habitat, BBC recommends surface remediation to restore vegetation and cause minimal disturbance to the habitat. This remediation would consist of plowing and discing the site and the addition of gypsum and fertilizer or humate. The site would then be reseeded with appropriate BLM seed mix, watered, and closed.

# Appendix I

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WORLD WIDE ENVIROITMENTAL SPECIALISTS

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#### Summary of Test Boring MCA Battery 1 Injection Line Leak

The test boring at the injection line leak site at MCA Battery No. 1 was advanced to a total of 138 feet below ground surface. The boring encountered about 4 feet of Quaternary age aeolian (windblown) sand at the surface resting on a thin layer of caliche. The remainder of the boring encountered sand of the upper part of the Triassic Dockum Group.

The upper 40 feet of the Dockum Group at this location is characterized by dark red, fine grain sand. Very thin poorly cemented sand layers were also encountered in the upper portion of the boring. A slightly moist zone was encountered from about 55 feet to about 75 feet below ground surface. This zone was not saturated and soils below this zone were dry. Grain size in the Dockum Group decreased with depth in the boring. Very thin silty clay layers are common in the lower portion of the boring. Several very thin gravel layers were also encountered from about 80 feet to 138 feet.

It is unlikely that a saturated zone (groundwater) will be encountered in the Dockum Group.



#### **RECORD OF SUBSURFACE EXPLORATION**

Project Name:	ConocoPhillips - MCA Battery 1 4" Trunkline
Borehole Number:	Soil Boring 1
Drilled by:	White Drilling
Date/Time Started	

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Date: August 3, 2005

Logged by: Steven Bond
Drilling/Rig Method(s): Air Rotary
Time Completed:

Depth (feet)	Sample Number	Sample Interval	Sample Type	Sample Description	PID Readings (ppm)	Comments
0 - -		0'-4'		Light red, fine grain wind-blown sand		
- - 5 -		4`-5`		Buff-pink caliche		
- - 		5'-10'		Light red to pink, fine grain, poorly sorted sand		
		4				
- 15 -						
		15`-26`		Dark red, fine grain, well sorted sand containing thin, poorly cemented layers, cement is likely CaCO <sub>3</sub>		
25 25 		26'-30'		Pale brown-red fine sand with thin CaCO <sub>3</sub> cemented zones		
30  - - -						
35 - - - 40		30'-45'		Dark red, fine silty sand containing thin CaCO3 cemented zones		
- - 45						
						é
50 - - -		45`-70`		Dark red, silty fine sand, slightly moist, grain size decreasing with depth		
				Page 1 of 3		



#### **RECORD OF SUBSURFACE EXPLORATION**

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Depth (feet)	Sample Number	Sample Interval	Sample Type	Sample Description	PID Readings (ppm)	Comments
55 -						
-						
- 60						
-						
65						
-						
70					) )	
1	8			1		3
- 75		70'-80'		Dark red, silty, very fine grain sand, no		
:		10.000		Dark red, silty, very fine grain sand, no moisture, thin gravel layer at base of unit		
-						
80						
-						
•		80'-88'		Dark red. silty, clayey sand		
85 -						
-						
- 90						
•						
- 95						
-						
100						
		88'-118'		Dark red to reddish-brown silty, clayey sand with very thin, blue-gray clay layers		
- 105				with very thin, blue-gray clay layers interbedded		
-						
Į.						
- 110	1					



#### RECORD OF SUBSURFACE EXPLORATION

Depth (feet)	Sample Number	Sample Interval	Sample Type	Sample Description	PID Readings (ppm)	Comments		
110								
-	1							
:	1							
115		anana masa l		an an an an an an a				
:		118'-120'		Green, moderately well cemented, fine grain sandstone				
- 120								
2					р — 3			
-		120*-125		Pale green, very fine grain sand with thin layer				
125				of large gravel				
-			). N		¥.	2 X		
:								
130		125'-138'		Red, silt with very fine sand, thin clay layers thin gravel layers				
-								
-								
135 -								
2								
- 140								
-								
2	ļ							
145								
-								
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150 -								
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- 155								
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- 160								
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165								

Technician Signature:

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File Number:

#### NEW MEXICO OFFICE OF THE STATE ENGINEER WELL RECORD

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1. OWNER OF WELL	
Name: ConocoPhillips	
Contact:	Home Phone:
Address: 1000 Conoco Rd.	_
City: Maljamar	State: NM Zip: 88264
2. LOCATION OF WELL (A, B, C, or D required, E or F if know	m)
A. 1/4 1/4 1/4 Section: 29 Town	nship: <u>17S</u> Range: <u>32E</u> N.M.P.M. County.
B. X =feet, Y = Zone in the	feet, N.M. Coordinate SystemGrant.
U.S.G.S. Quad Map	
C. Latitude: 32 d 48 m 40.2 s Longitu	de: 103 d 47 m 29.2 s
D. East (m), North (m), UTM	Zone 13, NAD (27 or 83)
E. Tract No, Map No of the	
F. Lot No, Block No of Unit/Tract Subdivision recorded in	OI the County.
G. Other:	
H. Give State Engineer File Number if existing well:	• 2
H. Give State Engineer File Number II existing weil	
I. On land owned by (required): ConocoPhillips	
A DETLY THE COMPACED	
3.DRILLING CONTRACTOR License Number: WD-1456	
Name: White Drilling Company, Inc.	Work Phone: 325-893-2950
Agent: John W. White	Home Phone: 325-893-2950
Mailing Address: P.O. Box 906	
City: Clyde	State: TX Zip: 79510
4. DRILLING RECORD: SB-2	
Drilling began: 8/03/05 ; Completed: 8/03/05	: Type tools: Air Rotary ;
Size of hole: 43/4 in.; Total depth of well: 138.	0 ft.;
Completed well is: shallow (shallow, arte	
Depth to water upon completion of well: DRY	ft.
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	*
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Form: wr-20 page 1 of 4	

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#### NEW MEXICO OFFICE OF THE STATE ENGINEER WELL RECORD

#### 5. PRINCIPAL WATER-BEARING STRATA:SB-2

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ved by OCD:

Depth i From	To	Thickness in feet	water-				Est	timated Yield (GPM)
	er Pour	NG	Depth Top		Length (feet)			Perforations From To
Depth From <b>138.0</b>	in Feet To <u>5.0</u> 0.0	ING AND CE Hole Diameter 43/4 43/4	MENTING Sacks of mud 19 2	Cubic Fee of Cement 0.99	t M Pour	/bentonite d mix/ceme	Placem	
Plu	ng Contra Add ugging Me	D ctor: ress: thod: gged:						
Plugging	No	d by: . Depth in F Top Bott	eet Cub	State E	ngineer Re Nement	epresentat	ive	
	2 3 4							
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Form: wr-20

page 2 of 4

Trn Number:

File Number:

#### NEW MEXICO OFFICE OF THE STATE ENGINEER WELL RECORD

9. LOG OF HOLE: SB-2

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Depth in feet Thickness Color and Type of Material Encountered in feet From To 4.0 Tan sand. 0.0 4.0 4.0 5.5 1.5 Tan caliche. 5.5 20.5 26.0 Tan sand. Red sand. 26.0 34.0 60.0 60.0 138.0 78.0 Red sandy clay.

File Number: Form: wr-20

4/21/2023

by OCD:

page 3 of 4

Trn Number:

Form provided by Forms On-A-Disk · 214-340-9429 · FormsOnADisk.com

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#### NEW MEXICO OFFICE OF THE STATE ENGINEER WELL RECORD

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belief,	ersigned hereby certifies that, to the best of his knowledge and the foregoing is a true and correct record of the above describe
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# Appendix II

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OCD:

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PHONE (325) 673-7001 · 2111 BEECHWOOD · ABILENE, TX 79603

PHONE (505) 393-2326 · 101 E. MARLAND · HOBBS, NM 88240

ANALYTICAL RESULTS FOR BBC INTERNATIONAL ATTN: CLIFF BRUNSON P.O. BOX 805 HOBBS, NM 88241 FAX TO: (505) 397-0397

Receiving Date: 08/05/05 Reporting Date: 08/08/05 Project Number: NONE GIVEN Project Name: MCA BATTERY 1 4" TRUNKLINE Project Location: MALJAMAR, NM Analysis Date: 08/06/05 Sampling Date: 08/03/05 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: AH Analyzed By: AH

LAB NUMBER

SAMPLE ID

(mg/L)

CI-

H10048-1	SB2@ 5'	3119
H10048-2	SB2@ 10'	6638
H10048-3	SB2@ 15'	4399
H10048-4	SB2@ 20'	3039
H10048-5	SB2@ 25'	3119
H10048-6	SB2@ 30'	3039
H10048-7	SB2@ 35'	768
H10048-8	SB2@ 40'	640
H10048-9	SB2@ 45'	320
H10048-10	SB2@ 50'	176
H10048-11	SB2@ 55'	176
H10048-12	SB2@ 60'	96
H10048-13	SB2@ 65'	144
H10048-14	SB2@ 70'	80
H10048-15	SB2@ 138'	128
Quality Control		1000
True Value QC		1000
% Recovery		100.0
<b>Relative Percent</b>	Difference	2

METHOD: Standard Methods 4500-CI-B Note: Analysis performed on a 1:4 w:v aqueous extract.

Fullation

Chemist

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<u>8/8/05</u> Date

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 client for anistysos. All claims, instring those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In the over shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profils 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.

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2111 Beechwood, Abilene, TX 79603 101 East Marland, Hobbs, NM 88240 (915) 673-7001 Fax (915) 673-7020 (505) 393-2326 Fax (505) 393-2478			Page / of 2
100	BILLTO		ANALYSIS REQUEST
	P.O.#:	· · · · ·	
Address: 1324 W. Marland	Company:		
City: Hobby States, MM . Zip: 81240	Attn:		
Phone = (505) 357 . 1354 Fax = (rat) 357 . 0357	Address: X	•	
Project #: Project Owner: Care cn Mill :	chy:		
Project Names, MCA Buffery 1 9" Town & line	State: Zlp:		
Project Location: Muljeror Mu.M.	Phone #:		
Sampler Name: Ken Pro Prove u	Fax #:		
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AF 21	Company Nama:	Project Manager	Address: 1324	city: Holds	Phone F. (Sp.C)	Project =	Project Nama: MCA	Project Location:	Samplar Name:	ייאריפירציטעע		Lab LD.	HIONIK-III.	21	-13	-14	1512		ALSO NOTE LINE AND YOUR WARNES AND	Sampler Rallnquis	2 2	Reilnquisned By:	Delivered Bur (Circle Oce)	Sampler - UPS -	T Cardinal ca

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## ATTACHMENT D

#### C-141 Page 3, Site Assessment /Characterization





#### State of New Mexico Oil Conservation Division Form C-141 Page 3 Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	<u>&gt;138 (</u> ft bgs)
Did this release impact groundwater or surface water?	🗌 Yes 🛛 No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	🗌 Yes 🛛 No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	🗌 Yes 🛛 No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	🗌 Yes 🛛 No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	🗌 Yes 🛛 No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	🗌 Yes 🛛 No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	🗌 Yes 🛛 No
Are the lateral extents of the release within 300 feet of a wetland?	🗌 Yes 🛛 No
Are the lateral extents of the release overlying a subsurface mine?	🗌 Yes 🛛 No
Are the lateral extents of the release overlying an unstable area such as karst geology?	🗌 Yes 🛛 No
Are the lateral extents of the release within a 100-year floodplain?	🗌 Yes 🛛 No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	🗌 Yes 🛛 No



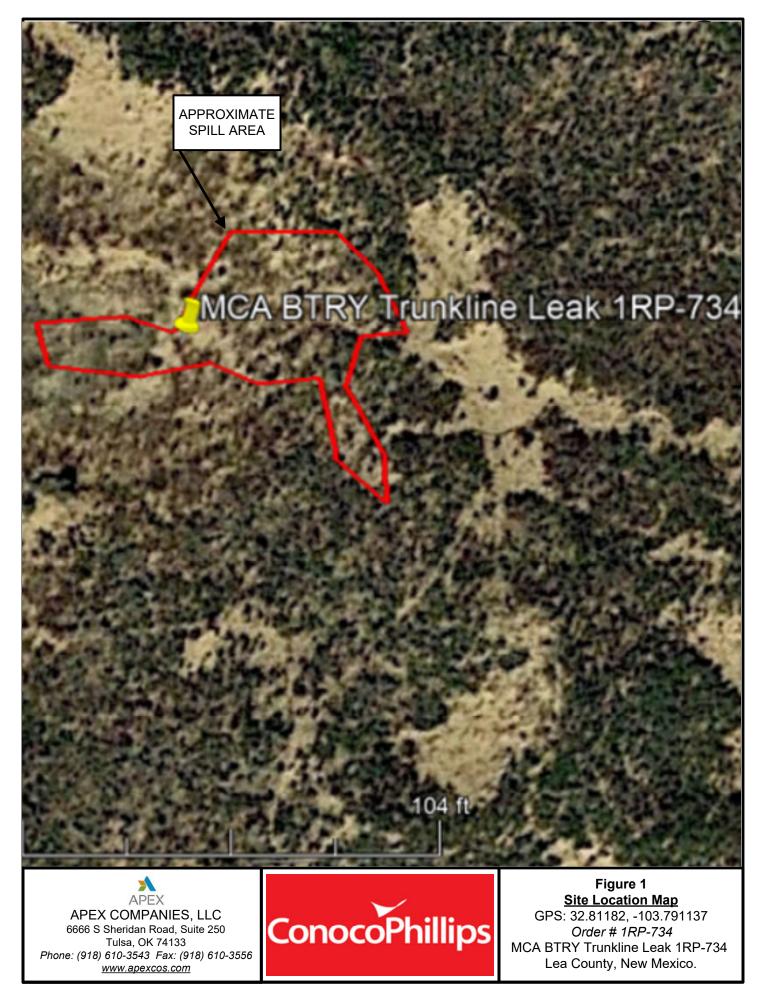


## **Figures**

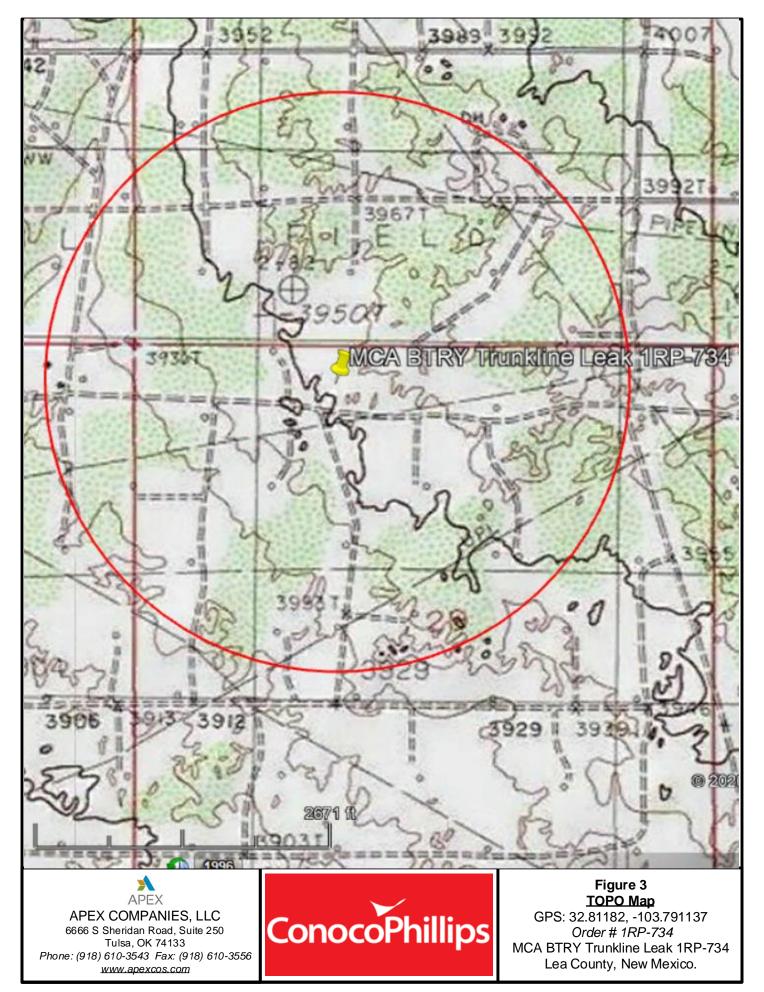
Site Location Map

Site Radius Map

**TOPO** radius Map







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

Operator:	OGRID:				
CONOCOPHILLIPS COMPANY	217817				
600 W. Illinois Avenue	Action Number:				
Midland, TX 79701	209720				
	Action Type:				
	[IM-SD] Incident File Support Doc (ENV) (IM-BNF)				

CONDITIONS

CONDITIONS		
Created By	Condition	Condition Date
amaxwell	Historical document upload. Closure approved on January 6, 2005	4/26/2023

Action 209720