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			X Initia	al Report		Final Report
Name of Co						hn W. Gates					
Address 33	300 North	A St. Bldg	6, Midla	nd, TX 79705-5	406 Telephone	No. 505.391.31	158		7.0		
Facility Nan	ne EVGS	AU 2801-00	)2		Facility Typ	e Oil and Gas	5				
Surface Ow	ner State	Of New M	evico	Mineral O	wner State Of N	ew Mevico		I ease N	No 300252	62250	0
Surface OW.	noi otate	OI NOW IVE	CAICO	Willicial	WIICI State OTT	CW MICKICO		Lease	10 300232	32230	U
				LOCA	TION OF RE	LEASE					
Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/V	Vest Line	County		
M	28	17S	35E						Lea		
				Latitude	Longi						
m on t				NAT	URE OF REL						
Type of Relea		ad water			Volume of Release 15.4bbl (15oil, .4		1		Recovered		
Crude Oil &		eu water			Date and Hour of		_	(15oil, 0v	Hour of Disc	OVOTU	
		ed from a sr	lif behin	d a pipe collar	08/03/11 0700	Occurrence		08/03/11		Svery	
				to suspected	0.00,11 0,00			00/00/11	0700		
fatigue.	IOII GUOCI G	ar mee non	mie aue	to suspected			1				
Was Immedia	te Notice C	liven?			If YES, To Whom	?					
	⊠ Y	es No	⊠ Not 1	Required							
By Whom?					Date and Hour						
Was a Watero	ourse Reac				If YES, Volume In	npacting the Wate	ercourse				
			Yes 🛚	No							
If a Watercou	rse was Im	pacted, Descri	be Fully.*							-	
		,	,								
									* 10		
Describe Caus											
The release	originate	d from a sp	lit behind	d a pipe collar o	n a 2 3/8 inch stee	el surface flow	line du	e to suspe	ected fatigu	e.	
Describe Area	Affacted o	and Cleanup A	etion Tel	on \$							
					ed and ~ 15 bbls o	f oil was recov	ered				
00 10 11 41	ca or pas	ture minu. A	vacuun	i ti uck was cam	d and - 15 bbis (	on was recov	ci cu.				
I hereby certif	y that the in	nformation gi	ven above	is true and comple	ete to the best of my	knowledge and u	nderstan	d that purs	uant to NMO	CD ru	les and
regulations all	operators a	are required to	report an	d/or file certain rel	ease notifications ar	d perform correct	tive action	ons for rele	eases which n	nay en	danger
					t by the NMOCD ma						
				investigate and rei	mediate contamination	on that pose a thre	eat to gro	ound water	, surface water	r, hun	
federal, state,				tance of a C-141 16	port						ther
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Signature: (	1040	n	ax	,		PPF	TI				
n /	100		U		/						
Printed Name:	John W.	Gates			-						
Title: HSER	Lead				Approval Date	e: 3/2/16	E	xpiration I	Date:		
D	T 1 100	0.0	1 ****			3-1-0-1					
E-mail Addres	s: John.W.	.Gates@cono	cophillip	s.com	Conditions of	Approval:			Attached		
Date: 08/08	/11	р	hone. sn	5.391.3158					1		
		al Sheets If I				-			1120	11.2	
Timon	- LUMINION	ar OHOVO II I	1000301)	,					(4-	41.	16

## 26 September 2011

Mr. Geoffrey Leking
Environmental Engineer
New Mexico Oil Conservation Division
1625 North French Drive
Hobbs, New Mexico 88240

**RE: Remediation Proposal** 

ConocoPhillips Company – EVGSAU Well #2801-002 Release Area

UL-M (SW1/4 of the SW1/4) of Section 28, T 17 S, R 35 E; Lea County, New Mexico

Latitude: 32° 46' 49.99"; Longitude: 103° 28' 11.64"

EPI Ref. #150034

## Dear Mr. Leking:

On 3 August 2011 at 0700 a.m. approximately 0.4-barrels (bbls) of produced water and 15-bbls of petroleum products were released from a 2-3/8 inch steel surface flow line. Approximately 0.4-bbl of produced water and 15-bbls of petroleum product were recovered. The combined fluids covered a release area of  $\pm 1,232$  and an overspray area of  $\pm 2,956$  square feet. After initial vacuuming of fluids, ConocoPhillips retained the services of Environmental Plus, Inc., (EPI) to GPS survey, photograph and assess product/water impacts of the release area. This letter report provides a *Remediation Proposal* for the release area.

### Site Background

The release area is located in Section 28, T17S, R35E at an approximate elevation of 3,951 feet above mean sea level (amsl). The property is owned by the State of New Mexico and managed by the New Mexico State Land Office (NMSLO). A search for water wells was completed utilizing the New Mexico Office of the State Engineers website and a database maintained by the United States Geological Survey (USGS). No water wells (domestic, agriculture or public) or bodies of surface water exist within a 1,000 feet radius of the release area (reference *Figure 2*). Groundwater data indicates the average water depth is approximately 65 feet below ground surface (bgs). Based on available information, it was determined the vertical distance between impacted soil and groundwater is approximately 60 feet. Utilizing this information, New Mexico Oil Conservation Division Remedial Threshold Goals (NMOCD Goals) for this Site were determined as following:

Parameter	NMOCD Goals
Benzene	10 mg/Kg
BTEX	50 mg/Kg
TPH	100 mg/Kg
Chlorides	250 mg/Kg

approved w/ condo...
obtain 2 VERTICAL
SAMPLE & ZHURIZOMAL
SAMPLES WHICH REPRESENT CLEAN + 1
Theoffrey februa
Emmonmental Engl
NMOCD-DIST 1
9/30/11

NOTE: ABOVE NMOCD CHALS ARE ACCEPTABLE
IF NEEDED TPH 1000 mg/kg & Chlorides 500 mg/kg may BE
2100 AVE 0 ~ PO BOX 1558 ~ EUNICE, NM 88231 USED.

PHONE (575) 394-3481 \* (575) 394-2601 FAX

DELINEATION OF CHLORIDES MUST BE TO 250 mg/kg.



### Field Work

On 17 August 2011 EPI visited the Release Area to conduct GPS survey, photograph and assess surface area damage. Having recently completed remediation activities in the Buckeye area [ConocoPhillips EVGSAU #29-13-006 Release Area located in UL-P (SE1/4 0f the SE1/4) of Section 29, T17S, R35E], EPI concluded delineation via trenching or soil borings was not required. Dense rock formations which commence approximately four (4) inches and extend over fifteen (15) feet below ground surface (bgs) limit vertical migration of production fluids. Based on related experience, impacted area should be limited to less than five (5) vertical feet. This concept is advanced by efficiency of cleanup efforts in vacuuming the release area leaving little volume of production fluids for sub-surface seepage.

#### **Analytical Data**

Owing to rapid response in surficial cleanup efforts, no soil samples were collected for field testing or laboratory analysis.

### Site Remedial Proposal

EPI proposes remediating the release area in its entirety. Citing previous experience, the area will be excavated via use of a combination of track hoe with rock bucket and hammer hoe. The release area will be excavated to whatever depth and width is necessary for removal of impacted material. Impacted material will be transported to a state approved land farm for remediation or disposal dependent on major type of contaminant, i.e., TPH or chloride concentrations. Field tests will be conducted to assist in determining physical limits of contaminated area.

Slightly impacted material in the Overspray Area (Ref. *Figure #3*) will be scraped surfically to remove discolored material. The bared areas will be sprayed with a six (6) percent solution of Micro®Blaze and a thin layer of top soil applied over the disturbed areas. Contouring and drill seeding of these areas will conform to procedures described below.

A portion of soil samples collected from sidewalls and bottom during excavation activities will be field analyzed for TPH and chloride concentrations. Soil samples collected for field testing of organic vapors will be placed in self sealing polyethylene bags and allowed to equilibrate to ~ 70° F. Soil samples will then be tested for organic vapors utilizing a MiniRae<sup>TM</sup> Photoionization Detector (PID) equipped with a 10.6 electron-volt (eV) lamp and calibrated for benzene response. Analysis for chloride concentrations will be conducted using a LaMotte Chloride Kit (titration method).

After field analysis for TPH and chloride concentrations have determined physical limits of contamination, soil samples will be collected for confirmatory laboratory analytical results. Soil samples designated for laboratory analysis are immediately inserted into laboratory provided containers, appropriately labeled, placed in coolers, iced down and transported to an independent laboratory for quantification of BTEX (benzene, toluene, ethylbenzene and total xylenes), TPH [Gasoline Range Organics (GRO) and Diesel Range Organics (DRO)] and chloride concentrations.

Upon receipt of laboratory analytical results confirming BTEX, TPH and chloride concentrations are below NMOCD Goals, backfilling activities will commence.



Excavated areas will be backfilled with top soil free of deleterious material, rocks and large clods. This material will be transported from a local pit in the Buckeye area to the job site. Backfill will be slightly mounded in the middle sloping peripherally to meet original ground surface. Disturbed areas will be contoured to blend with natural ground and prevent wind/water erosion. The entire disturbed area will be deep drill seeded with a blend approved by the NMSLO. However, EPI recommends seeding operations be completed late spring 2012 when weather and ground conditions are more conducive to vegetative growth.

Should you have technical questions, concerns or need for additional information, please contact me at (575) 394-3481 (office), (575) 441-7802 (cellular) or via e-mail at <a href="mailto:dduncanepi@gmail.com">dduncanepi@gmail.com</a>.

Official communications should be directed to Mr. John Gates at (575) 391-3158 (office), (575) 390-4821 (cellular) or via e-mail at <a href="mailto:John.W.Gates@conocophillips.com">John.W.Gates@conocophillips.com</a> with correspondence addressed to:

Mr. John W. Gates
HSER Lead
Permian-Buckeye Operations
29 Vacuum Complex Lane
Lovington, New Mexico 88260-9664

Sincerely,

ENVIRONMENTAL PLUS, INC.,

David P. Duncan Civil Engineer

**EPI Project Manager** 

Cc: Mr. John W. Gates, HSER Lead – ConocoPhillips Ms. Myra Harrison, Land Manager – NMSLO Roger Boone, Operations Manager - EPI

Encl: Figure 1 - Area Map

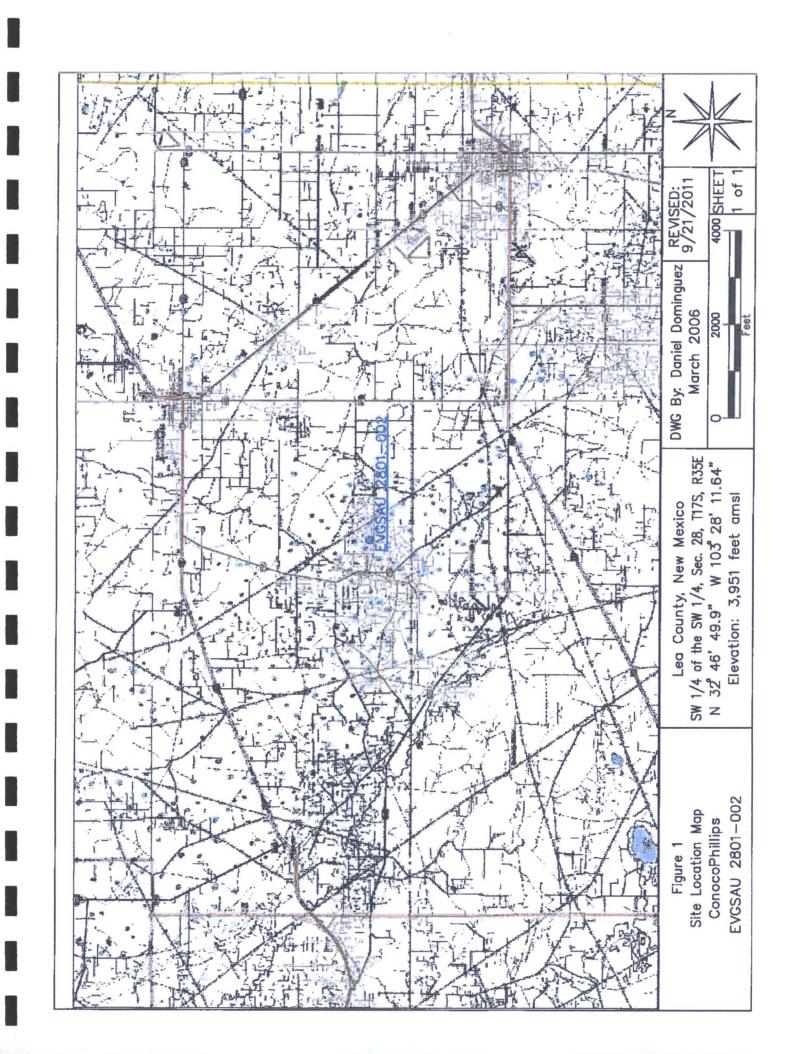
Figure 2 - Site Location Map

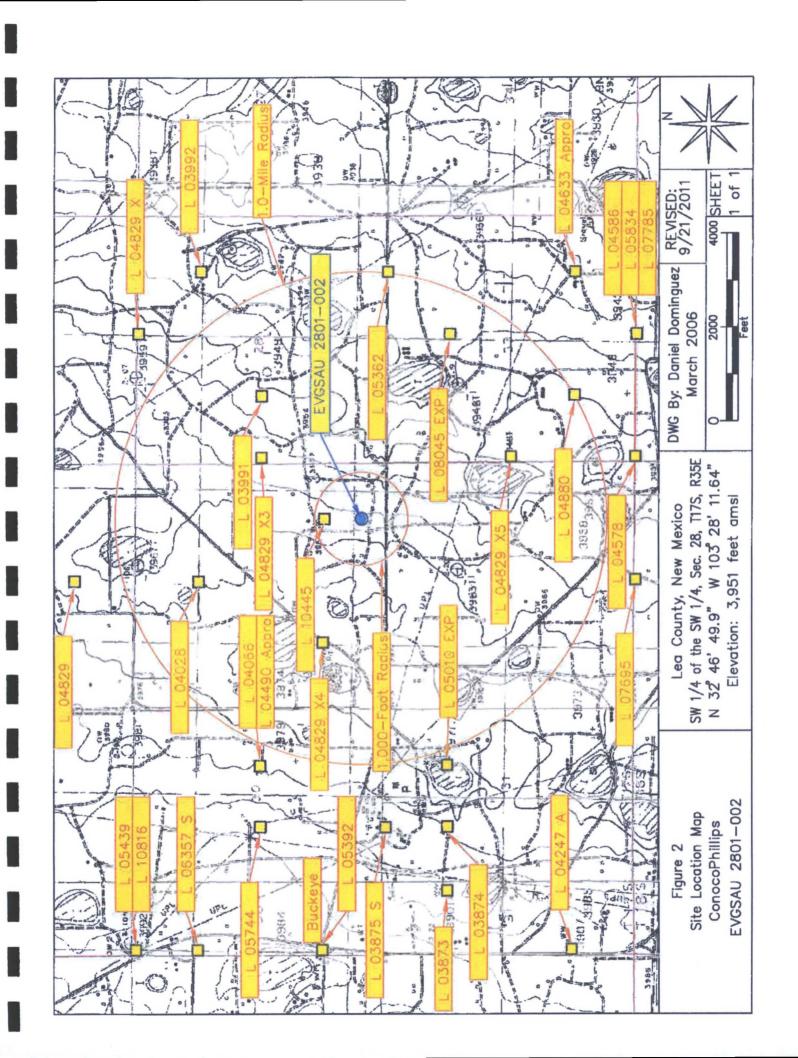
Figure 3 – Release Area Map

Table 1 - Well Data

Attachment I - Photographs of Release Area

Attachment II - Copy of Initial NMOCD Form C-141





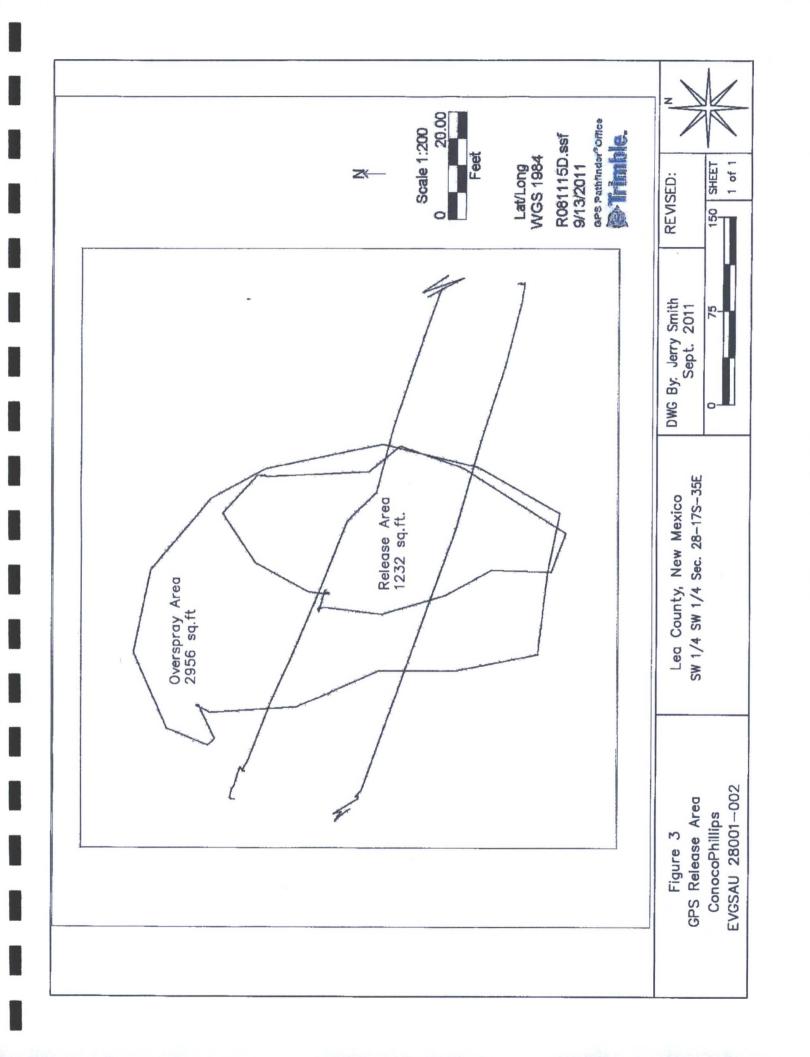


TABLE 1

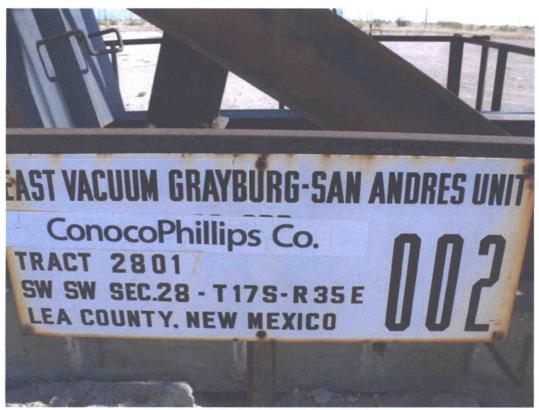
Well Data

ConocoPhillips - East Vacuum Grayburg - San Andres Unit Tract 2801-002 (Ref. # 150034)

Well Number	Diversion	Owner	Use	Twsp Rng	Rng	Sec q q q	Latitude	Longitude	Date Measured	Surface Elevation <sup>B</sup>	Depth to Water
											(ft bgs)
	3	ZAPATA PETROLEUM CORPORATION	PRO	17S	35E	29 2 1	N32° 48' 34.50"	W103° 28' 45.96"		3,973	
				178	35E	29 32	N32° 48' 8.33"	W103° 29' 1.36"		3,976	
	0	GILES LEE	STK	178	35E	29 424	N32° 48' 8.14"	W103° 28' 30.39"		3,967	
	0	HUMBLE OIL & REFINING COMPANY	PRO	178	35E 19	19 332	N32° 48' 47.66"	W103° 30' 18.14"	25-Jul-64	3,996	85
	0	PEARCE RANCH	STK	178	35E 19	19	N32° 48' 47.66"	W103° 30' 18.14"		3,996	
	317	PHILLIPS PETROLEUM COMPANY	OIL	178	35E 20	20 4 1	N32° 49' 0.71"	W103° 28' 46.03"		3,973	
				17S	35E	35E 21 43	N32° 48' 47.21"	W103° 27' 44.00"		3,957	
	0	ZAPATA PETROLEUM CO.	PRO	178	35E	35E 28 144	N32° 48' 21.08"	W103° 27' 59.45"		3,957	
	3	ZAPATA PETROLEUM CORPORATION	PRO	178	35E 28	28 223	N32° 48' 34.02"	W103° 27' 28.47"	02-Sep-58	3,947	65
				178	35E	28 13	N32° 48' 21.16"	W103° 28' 14.95"		3,963	
	0	HUMBLE OIL & REFINING COMPANY	PRO	178	35E	28 443	N32° 47' 54.70"	W103° 27' 28.42"	02-Apr-64	3,947	80
	0	DUKE ENERGY FIELD SERVICES, LP	POL	178	35E	30 433	N32° 47' 55.30"	W103° 29' 47.88"		3,986	
	3	GACKLE DRILLING COMPANY	PRO	178	35E	30 24	N32° 48' 21.55"	W103° 29' 32.41"	03-Feb-59	3,986	70
04490 APPRO	0	MORAN OIL PRODUCING & DRILLING	PRO	17S	35E	30 24	N32° 48' 21.55"	W103° 29' 32.41"	25-Jul-60	3,986	70
	0	INC. A.W. THOMPSON	PRO	17S	35E	30 31	N32° 48' 8.38"	W103° 30' 18.09"	16-May-64	3,996	80
	0	TRI-SERVICE DRILLING COMPANY	PRO	178	35E	35E 30 233	N32° 48' 21.53"	W103° 29' 47.94"		3,993	75
	207.8	REPUBLIC FACTORS INC. OF MIDLA	COM	178	35E	35E 30 113	N32° 48' 34.57"	W103° 30' 18.13"	20-Jun-89	3,996	130
	31.68	PHILLIPS PETROLEUM CO.	IND	178	35E	35E 31 123	N32° 47' 42.18"	W103° 30' 3.44"		3,986	
	23.67	PHILLIPS PETROLEUM CORP.	IND	178	35E 31	31 213	N32° 47' 42.18"	W103° 29' 47.86"		3,983	
	1400	U.S. BANK NATIONAL ASSOCIATION	IND	17S	35E 31	31 313	N32° 47' 16.01"	W103° 30' 18.04"	25-Jan-74	3,993	95
05010 EXP	0	NOBLE DRILLING CO.	PRO	178	35E	31 22	N32° 47' 42.15"	W103° 29' 32.29"		3,976	
	480	PHILLIPS PETROLEUM COMPANY	OIL	178	35E	32 43	N32° 47' 2.60"	W103° 28' 45.63"		3,963	
	3	SHOENFELD-HUNTER-KITCH DRLG.CO	PRO	178	35E 33	33	N32° 47' 2.45"	W103° 28' 14.75"	12-Jan-61	3,957	09
	3	HONDO DRILLING	PRO	178	35E 33	33 433	N32° 47' 2.29"	W103° 27' 43.86"	18-Jan-61	3,947	50
04633 APPRO	0	HONDO DRILLING COMPANY	PRO	178	35E 33	33 42	N32° 47' 15.34"	W103° 27' 28.42"	20-Apr-61	3,940	65
04829 X5				178	35E	35E 33 13	N32° 47' 28.77"	W103° 28' 14.73"		3,957	
	0	HONDO DRILLING CO.	PRO	178	35E	35E 33 32	N32° 47' 15.52"	W103° 27' 59.30"	18-Apr-62	3,953	06
	1150	SOUTHWESTERN PUBLIC SERVICE	IND	178	35E	35E 33 4	N32° 47' 2.29"	W103° 27' 43.86"		3,947	
	0	B CO	IND	178	35E	35E 33 43	N32° 47' 2.29"	W103° 27' 43.86"		3,947	
08045 EXP	0	PHILLIPS PETROLEUM COMPANY	SAN	178	35E 33	33 2 1 4	N32° 47' 41.68"	W103° 27' 43.89"		3,947	
	0	KERMAC POTASH CO.	PRO	178	35E 19	19 222	N32° 49' 27.04"	W103° 29' 32.54"	10-Feb-66	3,983	
	3	% CITIES SERVICE CO.	PRO	178	35E	20 114	N32° 49' 27.05"	W103° 29' 17.03"	27-Jul-55	3,987	09
	0	GILES LEE	STK	178	35E	20 133	N32° 49' 14.00"	W103° 29' 17.01"		3,983	
09097 (2) EXP	0	PHILLIPS PETROLEUM COMPANY	PRO	178	35E	21 142	N32° 49' 13,45"	W103° 27' 59.60"		3 967	

 $<sup>^{\</sup>mathrm{B}}=\mathrm{Elevation}$  interpolated from USGS topographical map based on referenced location. PRO = 72-12-1 Prospecting or development of natural resource IND = Industrial

OIL = Oil production
SAN = 72-12-1 Sanitary in conjunction with commercial use
COM = Commercial
COM = Commercial
COM = 2-12-1 Livestock watering
quarters are 1=NW, 2=NE, 3=SW, 4=SE, quarters are biggest to smallest
Shaded area indicates wells not shown in Figure 2



Photograph No. 1 - Lease Sign



Photograph No. 2 - Looking northwest at Release Area and steel surface flow line



Photograph No. 3 - Looking northerly at Release and Overspray Areas



Photograph No. 4 - Looking northeasterly at Release Area and surface steel flow line