



CONOCOPHILLIPS

P.O. Box 2197
Houston, TX 77252-2197
Phone 281.293.1000

DRAFT

Ruby 46
(1RP-3027)

Corrective Action Plan

API No. 30-025-41508

Release Date: April 20th, 2014

Unit Letter B, Section 18, Township 17S, Range 32E

August XX, 2014

Dr. Tomáš Oberding, PhD

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 Ruby 46 (1RP-3027)
UL/B sec. 18 T17S R32E
API No. 30-025-41508

DRAFT

Dr. Oberding:

ConocoPhillips (CoP) has retained Rice Environmental Consulting and Safety (RECS) to address potential environmental concerns at the above-referenced site.

Background and Previous Work

The site is located approximately 3 miles southwest of Maljamar, New Mexico at UL/B sec. 18 T17S R32E. NMOCD stated that groundwater will be located at a depth of approximately +/- 175 feet.

On April 20th, 2014, CoP discovered a stuffing box leak that had released 12.4 barrels of primarily produced water over 2,906 square feet of lease pad. A total of 10 barrels of this fluid was recovered. NMOCD was notified of the release on April 22nd, 2014, and an initial C-141 was approved by NMOCD on the same day (Appendix A)

RECS personnel were on site beginning on July 10th, 2014 to assess the site. Two points within the release area were sampled at the surface and with depth (Figure 1). The samples were field tested for chlorides and organic vapors, and the samples were taken to a commercial laboratory for analysis (Appendix B). Laboratory chloride readings returned values of 192 mg/kg at 6 inches bgs at Point 1, 320 mg/kg at 6 inches bgs at Point 2 and 240 mg/kg at 1 foot bgs at Point 2. Gasoline Range Organics (GRO) and BTEX readings returned levels of non-detect at all depths at both points. Diesel Range Organics (DRO) readings were elevated at the surface of both points but dropped below regulatory standards at 6 inches bgs.

Photo documentation of the site can be found in Appendix C.

Corrective Action Plan

Based on the laboratory analysis, the release area will be scraped down to 6 inches bgs and the excavated soil will be taken to a NMOCD approved facility for disposal. At the base of the

scrape a bottom composite sample will be taken to confirm that chloride, GRO and DRO levels are below regulatory standards. Clean caliche will be imported to the site to serve as backfill. A sample of the caliche will be taken to a commercial laboratory to confirm that chloride levels are below regulatory standards. The scrape will be backfilled with the imported caliche and contoured to the surrounding location.

Once these activities have been completed, a Termination Request will be submitted to NMOCD and BLM requesting 'remediation termination' and site closure.

RECS appreciates the opportunity to work with you on this project. Please call Hack Conder at (575) 393-2967 or me if you have any questions or wish to discuss the site.

Sincerely,

A handwritten signature in dark ink, appearing to read 'J.C.W.' followed by a stylized flourish.

Lara Weinheimer
Project Scientist
RECS
(575) 441-0431

Attachments:

- Figure 1 – Initial Sampling Data
- Appendix A – Initial C-141
- Appendix B – Initial Sampling Lab
- Appendix C – Photo Documentation

Figures

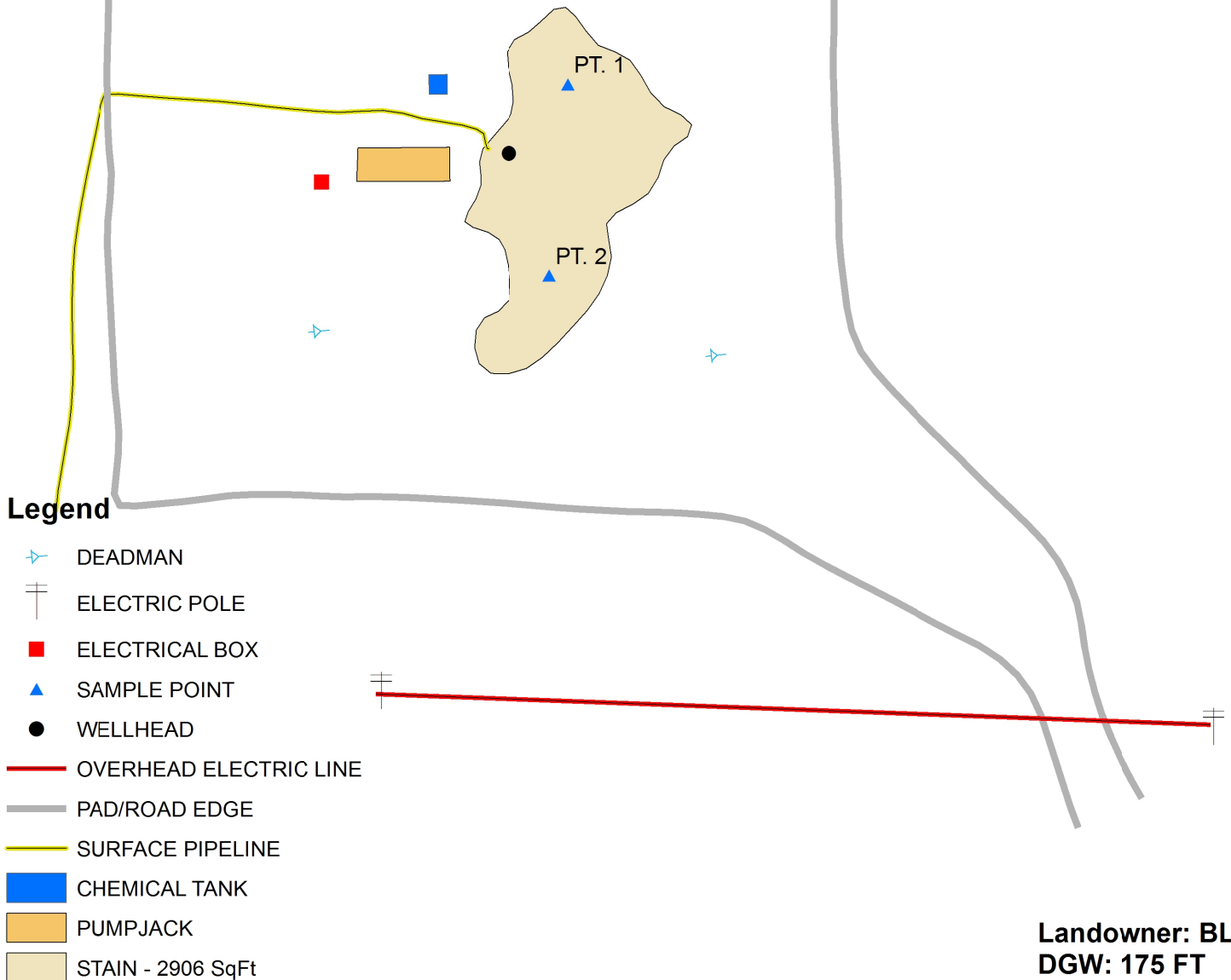
Initial Sampling Data

Point 1

	CI-	PID	GRO	DRO	B	T	E	X	TOTAL BTEX
Surface	2160	11.6	<50.0	4950	<0.050	<0.050	<0.050	<0.015	<0.300
6"	192	3.9	<10.0	146	<0.050	<0.050	<0.050	<0.015	<0.300

Point 2

	CI-	PID	GRO	DRO	B	T	E	X	TOTAL BTEX
Surface	5688	13.6	<50.0	5680	<0.050	<0.050	<0.050	<0.015	<0.300
6"	320	7.6	<10.0	70	<0.050	<0.050	<0.050	<0.015	<0.300
1'	240	1.3	<10.0	<10.0	<0.050	<0.050	<0.050	<0.015	<0.300



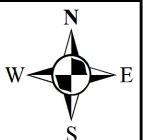
CONOCOPHILLIPS RUBY 46

Legals: UL/B sec. 18
T-17-S R-32-E
LEA COUNTY, NM

Figure 1

0 25 50
Feet

Drawing date: 7/17/14
Drafted by: L. Weinheimer



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

HOBBS OCD

Form C-141

APR 22 2014 Revised August 8, 2011

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

RECEIVED

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: ConocoPhillips	Contact: Spencer Cluff
Address: 29 Vacuum Complex Lane	Telephone No. 575-391-3143
Facility Name: Ruby 46	Facility Type: Oil Well

Surface Owner: NMOCD	Mineral Owner NMOCD	API No. 30-025-41508
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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	18	17S	32E	330	North	2310	East	LEA

Latitude 32.7832838382327 Longitude - 103.481947423473

NATURE OF RELEASE

Type of Release: Spill - PREDOMINANTLY PRODUCED WATER	Volume of Release: 12.4 BBLS	Volume Recovered: 10 BBLS
Source of Release: Stuffing Case	Date and Hour of Occurrence: 04/20/2014 03:30 am	Date and Hour of Discovery: SAME
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Geoffrey Leking	
By Whom? Spencer Cluff	Date and Hour: 04/22/2014 2:00 pm	
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.*

DTW = 175'

Describe Cause of Problem and Remedial Action Taken.* Well was shut in causing wellhead pressure to build, resulting in the stuffing box leak. Total amount was 11.4 BBLS of produced water and 1 BBLS of oil. There were 9.5 BBLS of produced water recovered and 0.5 BBLS of oil recovered.

Describe Area Affected and Cleanup Action Taken.*

Caliche pad area was 84" X 38" X 0.25" deep, 54" X 4" X 3" deep, and 16" X 6" X 12" deep and will be remediated according to NMOCD requirements.

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: Spencer A. Cluff		OIL CONSERVATION DIVISION	
Printed Name: Spencer Cluff		Approved by Environmental Specialist: Geoffrey Leking Environmental Specialist	
Title: LEAD HSE		Approval Date: 4/22/14	Expiration Date: 6/23/14
E-mail Address: spencer.a.cluff@conocophillips.com		Conditions of Approval: SUBMIT FINAL C-141 BY 6/23/14.	Attached <input type="checkbox"/>
Date: 4/22/2014	Phone: 575-391-3143	IRP-04-14-3027	

* Attach Additional Sheets If Necessary

APR 23 2014

Appendix B

Initial Sampling Lab

RICE Environmental Consulting and Safety (RECS)
P.O. Box 2948 Hobbs, NM 88241
Phone 575.393.2967

July 24, 2014

LAURA FLORES

RICE ENVIRONMENTAL CONSULTING & SAFETY LLC

419 W. CAIN

HOBBS, NM 88240

RE: RUBY FEDERAL #46

Enclosed are the results of analyses for samples received by the laboratory on 07/16/14 15:00.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. 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.

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:

RICE ENVIRONMENTAL CONSULTING & SAFETY
LAURA FLORES
419 W. CAIN
HOBBS NM, 88240
Fax To: (575) 397-1471

Received:	07/16/2014	Sampling Date:	07/16/2014
Reported:	07/24/2014	Sampling Type:	Soil
Project Name:	RUBY FEDERAL #46	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: PT. 1 @ SURFACE (H402159-01)

BTX 8021B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	07/23/2014	ND	2.41	120	2.00	2.72	
Toluene*	<0.050	0.050	07/23/2014	ND	2.20	110	2.00	3.49	
Ethylbenzene*	<0.050	0.050	07/23/2014	ND	2.45	122	2.00	4.14	
Total Xylenes*	<0.150	0.150	07/23/2014	ND	7.86	131	6.00	4.44	
Total BTX	<0.300	0.300	07/23/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 103 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	2160	16.0	07/21/2014	ND	400	100	400	3.92	

TPH 8015M		mg/kg		Analyzed By: MS						S-06
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<50.0	50.0	07/17/2014	ND	179	89.7	200	2.05		
DRO >C10-C28	4950	50.0	07/17/2014	ND	194	96.8	200	2.02		

Surrogate: 1-Chlorooctane 113 % 65.2-140

Surrogate: 1-Chlorooctadecane 214 % 63.6-154

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

 RICE ENVIRONMENTAL CONSULTING & SAFETY
 LAURA FLORES
 419 W. CAIN
 HOBBS NM, 88240
 Fax To: (575) 397-1471

 Received: 07/16/2014
 Reported: 07/24/2014
 Project Name: RUBY FEDERAL #46
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 07/16/2014
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: PT. 1 @ 6" (H402159-02)

BTEx 8021B		mg/kg		Analyzed By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	07/21/2014	ND	2.41	120	2.00	2.72	
Toluene*	<0.050	0.050	07/21/2014	ND	2.20	110	2.00	3.49	
Ethylbenzene*	<0.050	0.050	07/21/2014	ND	2.45	122	2.00	4.14	
Total Xylenes*	<0.150	0.150	07/21/2014	ND	7.86	131	6.00	4.44	
Total BTEx	<0.300	0.300	07/21/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 103 % 89.4-126

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	192	16.0	07/21/2014	ND	400	100	400	3.92	

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	07/17/2014	ND	189	94.3	200	2.51	
DRO >C10-C28	146	10.0	07/17/2014	ND	210	105	200	4.14	

Surrogate: 1-Chlorooctane 107 % 65.2-140

Surrogate: 1-Chlorooctadecane 116 % 63.6-154

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*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

RICE ENVIRONMENTAL CONSULTING & SAFETY
LAURA FLORES
419 W. CAIN
HOBBS NM, 88240
Fax To: (575) 397-1471

Received:	07/16/2014	Sampling Date:	07/16/2014
Reported:	07/24/2014	Sampling Type:	Soil
Project Name:	RUBY FEDERAL #46	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: PT. 2 @ SURFACE (H402159-03)

BTEx 8021B		mg/kg		Analyzed By: ms						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	07/21/2014	ND	2.41	120	2.00	2.72		
Toluene*	<0.050	0.050	07/21/2014	ND	2.20	110	2.00	3.49		
Ethylbenzene*	<0.050	0.050	07/21/2014	ND	2.45	122	2.00	4.14		
Total Xylenes*	<0.150	0.150	07/21/2014	ND	7.86	131	6.00	4.44		
Total BTEX	<0.300	0.300	07/21/2014	ND						

Surrogate: 4-Bromofluorobenzene (PID) 103 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	5600	16.0	07/21/2014	ND	400	100	400	3.92		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<50.0	50.0	07/18/2014	ND	189	94.3	200	2.51		
DRO >C10-C28	5680	50.0	07/18/2014	ND	210	105	200	4.14		

Surrogate: 1-Chlorooctane 109 % 65.2-140

Surrogate: 1-Chlorooctadecane 231 % 63.6-154

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

RICE ENVIRONMENTAL CONSULTING & SAFETY
LAURA FLORES
419 W. CAIN
HOBBS NM, 88240
Fax To: (575) 397-1471

Received:	07/16/2014	Sampling Date:	07/16/2014
Reported:	07/24/2014	Sampling Type:	Soil
Project Name:	RUBY FEDERAL #46	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: PT. 2 @ 6" (H402159-04)

BTEx 8021B		mg/kg		Analyzed By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	07/21/2014	ND	2.41	120	2.00	2.72	
Toluene*	<0.050	0.050	07/21/2014	ND	2.20	110	2.00	3.49	
Ethylbenzene*	<0.050	0.050	07/21/2014	ND	2.45	122	2.00	4.14	
Total Xylenes*	<0.150	0.150	07/21/2014	ND	7.86	131	6.00	4.44	
Total BTEx	<0.300	0.300	07/21/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 103 % 89.4-126

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	320	16.0	07/21/2014	ND	400	100	400	3.92	

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	07/18/2014	ND	189	94.3	200	2.51	
DRO >C10-C28	70.0	10.0	07/18/2014	ND	210	105	200	4.14	

Surrogate: 1-Chlorooctane 101 % 65.2-140

Surrogate: 1-Chlorooctadecane 118 % 63.6-154

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*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

RICE ENVIRONMENTAL CONSULTING & SAFETY
LAURA FLORES
419 W. CAIN
HOBBS NM, 88240
Fax To: (575) 397-1471

Received: 07/16/2014
Reported: 07/24/2014
Project Name: RUBY FEDERAL #46
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 07/16/2014
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: PT. 2 @ 1' (H402159-05)

BTX 8021B		mg/kg		Analyzed By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	07/21/2014	ND	2.41	120	2.00	2.72	
Toluene*	<0.050	0.050	07/21/2014	ND	2.20	110	2.00	3.49	
Ethylbenzene*	<0.050	0.050	07/21/2014	ND	2.45	122	2.00	4.14	
Total Xylenes*	<0.150	0.150	07/21/2014	ND	7.86	131	6.00	4.44	
Total BTX	<0.300	0.300	07/21/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 102 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	240	16.0	07/21/2014	ND	400	100	400	3.92	

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	07/18/2014	ND	189	94.3	200	2.51	
DRO >C10-C28	<10.0	10.0	07/18/2014	ND	210	105	200	4.14	

Surrogate: 1-Chlorooctane 98.7 % 65.2-140

Surrogate: 1-Chlorooctadecane 105 % 63.6-154

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*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

S-06	The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.
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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Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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Relinquished By:		Date:	Received By:	Phone Result:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Phone #:
Kyle Schmidt		7-16-14	Jodi Henson	Fax Result:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Fax #:
Relinquished By:		Time:		REMARKS:		
				email: hconder@riceswd.com; lflores@rice-ecs.com;		
Delivered By: (Circle One)				lweinheimer@rice-ecs.com; knorman@rice-ecs.com;		
Sampler - UPS - Bus - Other:				jkamplain@rice-ecs.com; sedwards@rice-ecs.com;		
				cursanic@rice-ecs.com		
				Environmental Tech: @rice-ecs.com		

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

#54

Appendix C

Photo Documentation

RICE Environmental Consulting and Safety (RECS)
P.O. Box 2948 Hobbs, NM 88241
Phone 575.393.2967

ConocoPhillips Ruby 46

Unit Letter B, Section 18, T17S, R32E



Initial release area, facing west

7/10/14



Initial release area, facing north

7/10/14



Hand auguring for depth, facing northwest

7/16/14