



RECEIVED

By JKeyes at 8:41 am, Nov 04, 2015

APPROVED

By JKeyes at 8:41 am, Nov 04, 2015

CONOCOPHILLIPS

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

State J-2 Battery (1RP-3466)

Corrective Action Plan

API No. 30-025-33277

Release Date: December 17th, 2014

Unit Letter T, Section 2, Township 22S, Range 32E



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

November 3rd, 2015

Kellie Jones

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 State J2 Battery (1RP-3466)
UL/T sec. 2 T22S R32E
API No. 30-025-33277**

Ms. Jones:

ConocoPhillips (CoP) has retained Basin Environmental Service Technologies, LLC (Basin) to address potential environmental concerns at the above-referenced site.

Background and Previous Work

The site is located approximately 4.4 miles southwest of Eunice, New Mexico. The initial C-141 states that the site is located at UL/T Sec. 2 T22S R32E. However, GIS mapping shows the site to be located within UL/I Sec. 2 T22S R36E. NM OSE, BLM and Basin installed monitor well records indicate that groundwater will likely be encountered at a depth of approximately 130 +/- feet.

On December 17th, 2014, CoP discovered that a tank had overflowed, releasing 10 barrels of oil and 5 barrels of produced water over 1,558 sq ft of caliche pad. Approximately 1,833 sq ft of pasture & pad was also affected by overspray. A total of 10 barrels of oil and produced water were recovered. NMOCD was notified of the release on December 18th, 2014, and an initial C-141 was submitted to NMOCD for approval. NMOCD approved the C-141 on December 18th, 2014 (Appendix A).

Basin personnel were on site to visually assess the release on December 22nd, 2014. The release was mapped (Figure 1) and photographed (Appendix C). On October 7th, 2015, samples were taken at the surface and with depth and sent to a commercial laboratory for analysis. Laboratory analysis of Point 1 Surface returned a chloride and a Gasoline Range Organics (GRO) and Diesel Range Organics (DRO) value of non detect, Point 2 Surface chloride and a Gasoline Range Organics (GRO) value of non detect and Diesel Range Organics (DRO) value of 27.2 mg/kg, Point 3 surface chloride value of 368, a GRO value of non detect, a DRO value of 13,300 mg/kg and BTEX values of non-detect, at 6" chloride value of 64, a GRO value of non detect, a DRO

value of 3,170 mg/kg and BTEX values of non-detect, Point 4 surface chloride value of 192, a GRO value of non detect, a DRO value of 24,100 mg/kg and BTEX values of non-detect, at 6" chloride value of 176, a GRO value of non detect, a DRO value of 1,360 mg/kg and BTEX values of non-detect (Appendix B).

The overspray on the pasture and pad around Points 1 and 2 was washed with clean water and Dawn dish soap to remove any staining.

Corrective Action Plan

Based on the laboratory analysis, the release will be scraped down to 6 inches bgs around points 3 & 4. Once the scrape is completed, discrete samples from the bottom of the scrape will be taken and field tested for chlorides and organic vapors. If the field data indicates that the samples will not achieve chloride, Gasoline Range Organics (GRO), Diesel Range Organics (DRO) and BTEX readings below regulatory standards, the scrape will be deepened until field testing indicates that all constituents from the discrete samples will return values below regulatory standards. The discrete samples will then be taken to a commercial laboratory to confirm that all constituents return readings are below regulatory standards.

All excavated soils will be taken to a NMOCD approved facility for disposal. Clean soil will be imported to the site to use as backfill. A sample of the imported soil will be taken to a commercial laboratory to confirm that the chloride reading is below regulatory standards. The scrape will be backfilled with the clean, imported soil and contoured to the surrounding location.

Once these activities have been completed, a report will be sent to NMOCD requesting 'remediation termination' and site closure.

Basin appreciates the opportunity to work with you on this project. Please contact me if you have any questions or wish to discuss the site.

Sincerely,

A handwritten signature in black ink, appearing to read "Kyle Norman", followed by a horizontal line.

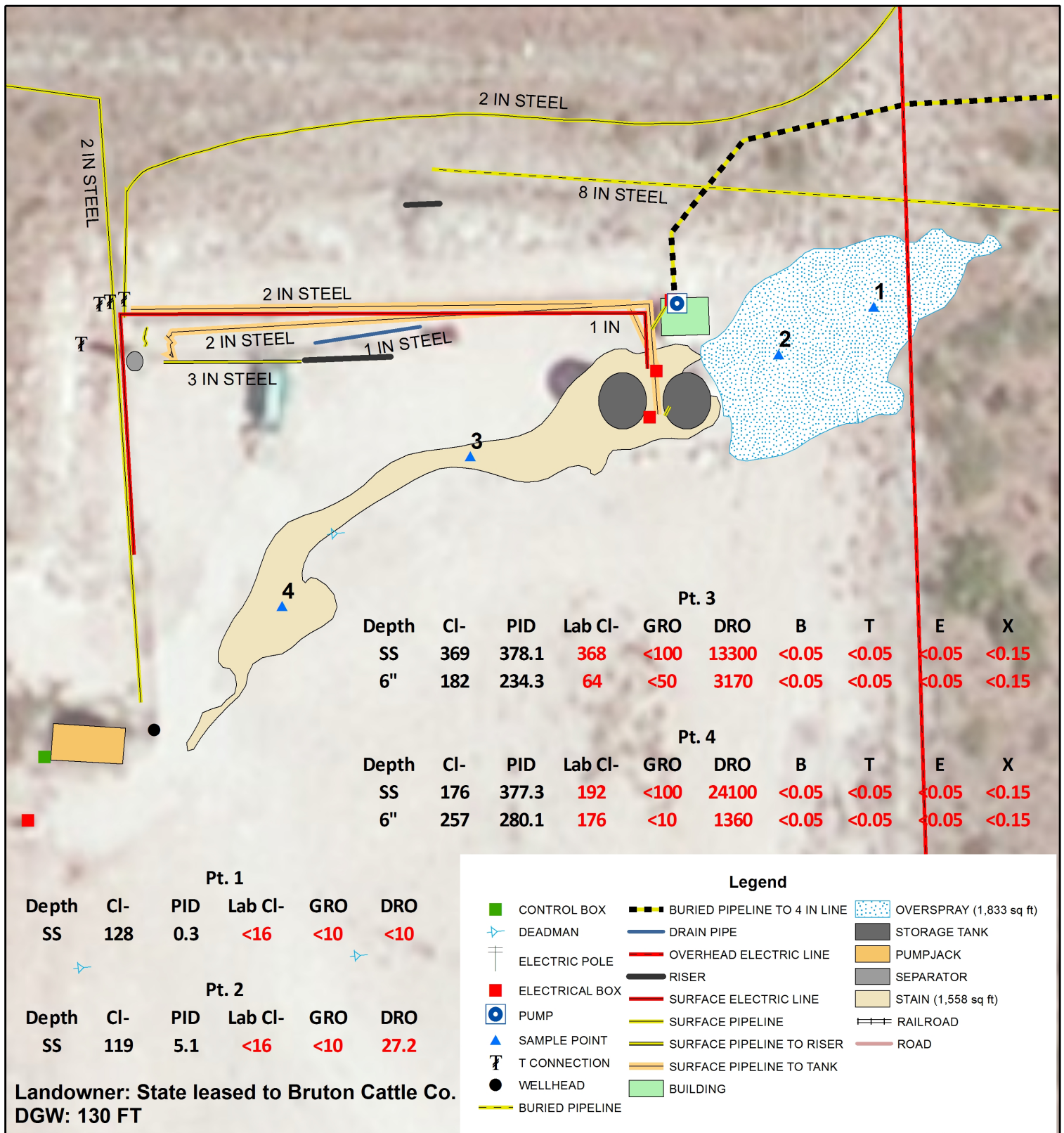
Kyle Norman
Project Lead
Basin Environmental Service Technologies, LLC
(575) 942-8542

Attachments:

- Figure 1 – Site Map
- Appendix A – Initial C-141
- Appendix B – Laboratory Analysis
- Appendix C – Photo Documentation

Figures

Site Map



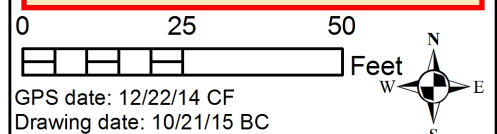
CONOCOPHILLIPS STATE J 2 BATTERY

1RP-3466

Legals: UL/I sec. 2
T-22-S R-36-E
LEA COUNTY, NM

Figure 1

Underground facilities are
spatially projected
and need to be field verified.



Appendix A

Intial 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
HOBBS
Oil Conservation Division
20 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 8, 2011

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

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: ConocoPhillips	Contact: Jose A Zepeda
Address: 1410 N West County Road	Telephone No. 575-391-3165
Facility Name: State J2 Battery	Facility Type: Battery

Surface Owner: State	Mineral Owner: N/A	API No. 300250415700801
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LOCATION OF RELEASE

30025 31277 70

Unit Letter T	Section 2	Township 20S 22S	Range 36E 32E	Feet from the	North/South Line	Feet from the	East/West Line	County Lea
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Latitude **32.4173** Longitude **-107.2307**

NATURE OF RELEASE

Type of Release: OIL/Produce Water	Volume of Release: 15 BBLs	Volume Recovered: 10BBL
Source of Release: Tank	Date and Hour of Occurrence 12/17/2014 ~1730	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? Oberding, Tomas, VIA Email	
By Whom? Jose A Zepeda	Date and Hour: 12/18/2014 ~1300	
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.*
N/A

Describe Cause of Problem and Remedial Action Taken.* On December 17, 2014 @ ~1730 hrs. MST @ the State J2 Battery, there was an accidental discharge from a tank over flow. COPC MSO received a call from supervisor about a stuffing box leak. COPC MSO arrived on location and discovered there was not a stuffing box leak; however a tank was running over. COPC MSO shut in location to cease anymore loss of fluid; he then checked panel views and head switches and all were incorrect. COPC MSO discovered transfer pump never came on to dump water from tank and MSO never received any alarms prior to this incident. COPC MSO got a vacuum truck to pull down tank he also contacted COPC I&E to come and get pump running. COPC MSO finally received alarms at approx. 7:30 P.M., about 2 hours after incident had already happened. Total loss of fluid was approx. 10bbls oil and 5bbls water. COPC MSO continued on without any further incidents. Spill site will be remediated in place in accordance with COPC and NMOCD guidelines.

Describe Area Affected and Cleanup Action Taken.*

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.

OIL CONSERVATION DIVISION

Signature: JOSE A ZEPEDA	Approved by Environmental Specialist:	
Printed Name: Jose A Zepeda		
Title: LEAD HSE	Approval Date: 12-18-14	Expiration Date: 2-18-15
E-mail Address: Jose. A. Zepeda@conocophillips.com	Conditions of Approval: <i>Site Supervisor signed - Delute and Remediate area as per NMOCD guidelines Submit Final C-141 by 27819</i>	Attached <input type="checkbox"/> IRP-3466
Date: 12/18/14	Phone: 575-391-3158	

* Attach Additional Sheets If Necessary

DEC 23 2014

5092
121014 3524974
PT014 35249952

Appendix B

Laboratory Analysis

Basin Environmental Service Technologies, LLC
P.O. Box 2948 Hobbs, NM 88241
Phone 575.393.2967



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

October 21, 2015

KYLE NORMAN

Basin Environmental Service

P.O. Box 301

Lovington, NM 88260

RE: STATE J2 BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 10/20/15 10:10.

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,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive, flowing style.

Celey D. Keene

Lab Director/Quality Manager

Analytical Results For:

Basin Environmental Service
KYLE NORMAN
P.O. Box 301
Lovington NM, 88260
Fax To: (575) 396-1429

Received: 10/20/2015
Reported: 10/21/2015
Project Name: STATE J2 BATTERY
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 10/07/2015
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: PT. 1 @ SURFACE (H502731-01)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	10/20/2015	ND	352	88.0	400	12.8	
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	10/20/2015	ND	201	100	200	2.40	
DRO >C10-C28	<10.0	10.0	10/20/2015	ND	215	107	200	1.74	
Surrogate: 1-Chlorooctane	89.5 %	47.2-157							
Surrogate: 1-Chlorooctadecane	96.0 %	52.1-176							

Sample ID: PT. 2 @ SURFACE (H502731-02)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	10/20/2015	ND	368	92.0	400	0.00	
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	10/20/2015	ND	201	100	200	2.40	
DRO >C10-C28	27.2	10.0	10/20/2015	ND	215	107	200	1.74	
Surrogate: 1-Chlorooctane	93.2 %	47.2-157							
Surrogate: 1-Chlorooctadecane	97.8 %	52.1-176							

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

 Basin Environmental Service
 KYLE NORMAN
 P.O. Box 301
 Lovington NM, 88260
 Fax To: (575) 396-1429

 Received: 10/20/2015
 Reported: 10/21/2015
 Project Name: STATE J2 BATTERY
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 10/07/2015
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: PT. 3 @ SURFACE (H502731-03)

BTX 8021B		mg/L		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/20/2015	ND	2.04	102	2.00	0.988	
Toluene*	<0.050	0.050	10/20/2015	ND	1.86	92.8	2.00	1.59	
Ethylbenzene*	<0.050	0.050	10/20/2015	ND	1.84	91.9	2.00	1.91	
Total Xylenes*	<0.150	0.150	10/20/2015	ND	6.03	100	6.00	2.01	
Total BTX	<0.300	0.300	10/20/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 100 % 66.2-142

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	368	16.0	10/20/2015	ND	368	92.0	400	0.00	

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	<100	100	10/20/2015	ND	201	100	200	2.40	
DRO >C10-C28	13300	100	10/20/2015	ND	215	107	200	1.74	

Surrogate: 1-Chlorooctane 66.0 % 47.2-157

Surrogate: 1-Chlorooctadecane 426 % 52.1-176

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 Basin Environmental Service
 KYLE NORMAN
 P.O. Box 301
 Lovington NM, 88260
 Fax To: (575) 396-1429

 Received: 10/20/2015
 Reported: 10/21/2015
 Project Name: STATE J2 BATTERY
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 10/07/2015
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: PT. 3 @ 6" (H502731-04)

BTEx 8021B		mg/L		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/20/2015	ND	2.04	102	2.00	0.988	
Toluene*	<0.050	0.050	10/20/2015	ND	1.86	92.8	2.00	1.59	
Ethylbenzene*	<0.050	0.050	10/20/2015	ND	1.84	91.9	2.00	1.91	
Total Xylenes*	<0.150	0.150	10/20/2015	ND	6.03	100	6.00	2.01	
Total BTEx	<0.300	0.300	10/20/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 100 % 66.2-142

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	10/20/2015	ND	368	92.0	400	0.00	

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	10/20/2015	ND	201	100	200	2.40	
DRO >C10-C28	3170	50.0	10/20/2015	ND	215	107	200	1.74	

Surrogate: 1-Chlorooctane 74.4 % 47.2-157

Surrogate: 1-Chlorooctadecane 138 % 52.1-176

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

Basin Environmental Service
KYLE NORMAN
P.O. Box 301
Lovington NM, 88260
Fax To: (575) 396-1429

Received: 10/20/2015
Reported: 10/21/2015
Project Name: STATE J2 BATTERY
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 10/07/2015
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: PT. 4 @ SURFACE (H502731-05)

BTX 8021B		mg/L		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/20/2015	ND	2.04	102	2.00	0.988	
Toluene*	<0.050	0.050	10/20/2015	ND	1.86	92.8	2.00	1.59	
Ethylbenzene*	<0.050	0.050	10/20/2015	ND	1.84	91.9	2.00	1.91	
Total Xylenes*	<0.150	0.150	10/20/2015	ND	6.03	100	6.00	2.01	
Total BTX	<0.300	0.300	10/20/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 105 % 66.2-142

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	10/20/2015	ND	368	92.0	400	0.00	

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	<100	100	10/20/2015	ND	201	100	200	2.40		
DRO >C10-C28	24100	100	10/20/2015	ND	215	107	200	1.74		

Surrogate: 1-Chlorooctane 101 % 47.2-157

Surrogate: 1-Chlorooctadecane 776 % 52.1-176

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*=Accredited Analyte

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 Basin Environmental Service
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 P.O. Box 301
 Lovington NM, 88260
 Fax To: (575) 396-1429

 Received: 10/20/2015
 Reported: 10/21/2015
 Project Name: STATE J2 BATTERY
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 10/07/2015
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: PT. 4 @ 6" (H502731-06)

BTEx 8021B		mg/L		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/20/2015	ND	2.04	102	2.00	0.988	
Toluene*	<0.050	0.050	10/20/2015	ND	1.86	92.8	2.00	1.59	
Ethylbenzene*	<0.050	0.050	10/20/2015	ND	1.84	91.9	2.00	1.91	
Total Xylenes*	<0.150	0.150	10/20/2015	ND	6.03	100	6.00	2.01	
Total BTEx	<0.300	0.300	10/20/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 103 % 66.2-142

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	176	16.0	10/20/2015	ND	368	92.0	400	0.00	

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	10/20/2015	ND	201	100	200	2.40	
DRO >C10-C28	1360	10.0	10/20/2015	ND	215	107	200	1.74	

Surrogate: 1-Chlorooctane 88.6 % 47.2-157

Surrogate: 1-Chlorooctadecane 115 % 52.1-176

Cardinal Laboratories

*=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

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

ORDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603
(505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325) 673-7020

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]

Appendix C

Photo Documentation

Basin Environmental Service Technologies, LLC
P.O. Box 2948 Hobbs, NM 88241
Phone 575.393.2967

ConocoPhillips J2 Battery

Unit Letter I, Section 2, T22S, R36E



Initial release area, facing southwest

12/22/14



Initial release area, facing northeast

12/22/14



Initial release area, facing west

12/22/14



Washed overspray area, Facing southwest

10/06/15

