



RECEIVED

By JKeyes at 8:46 am, Dec 02, 2015

APPROVED

By JKeyes at 8:46 am, Dec 02, 2015

Confirmation sample required at
sample point 2.
Ensure BLM concurrence/approval.

CONOCOPHILLIPS

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

SEMU 180
(1RP-3500)

Corrective Action Plan

API No. 30-025-39189

Release Date: January 9th, 2015

Unit Letter L, Section 13, Township 20S, Range 37E



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

December 02, 2015

Jamie Keyes

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 SEMU 180 (1RP-3500)
UL/L sec. 13 T20S R37E
API No. 30-025-39189**

Mr. Keyes:

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

Background and Previous Work

The site is located approximately 4.8 miles southwest of Monument, New Mexico at UL/L sec. 13 T20S R37E. NM OSE, BLM and BEST installed monitor well records indicate that groundwater will likely be encountered at a depth of approximately 59 +/- feet.

On January 9th, 2015, CoP discovered a leak from a valve on the production tubing intake line that released 6.57 barrels of produced water and oil over 951 sq ft of caliche pad. A total of 2 barrels of oil and 1 barrel of produced water were recovered. NMOCD was notified of the release on January 12th, 2015, and an initial C-141 was submitted for their approval (Appendix A). NMOCD approved the initial C-141 on January 12th, 2015.

BEST personnel were on site to visually assess the release on January 19th, 2015. The release was mapped (Figure 1) and photographed (Appendix C). On November 12th, 2015, samples were taken at the surface and with depth and sent to a commercial laboratory for analysis (Appendix B). Laboratory analysis of Pt.1 at 6" returned chloride value of 8,260 mg/kg and a Gasoline Range Organics (GRO) value of 32.8 mg/kg and Diesel Range Organics (DRO) value of 987 mg/kg and BETEX value of 0.940 mg/kg, at 1.5' chloride value of 176 mg/kg and a Diesel Range Organics (DRO) 224 mg/kg and Gasoline Range Organics (GRO) and BETEX values of non detect, Pt. 2 Surface returned chloride value of 672 mg/kg and a Gasoline Range Organics (GRO) value of non detect and Diesel Range Organics (DRO) value of 11,100 mg/kg and BETEX value of 0.834 mg/kg, at 6" returned chloride value of 160 mg/kg and a Gasoline Range Organics (GRO) value of 277 mg/kg and Diesel Range Organics (DRO) value of 4,310 mg/kg and BETEX value of 13.8 mg/kg.

Corrective Action Plan

Based on the laboratory analysis, the release will be scraped down to 1.5 feet bgs around point 1 and 1 foot bgs around point 2. Once the scrape is completed, discreet 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 discreet samples will return values below regulatory standards. The discreet 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 caliche will be imported to the site to serve as backfill. A sample of the imported caliche 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 caliche and contoured to the surrounding location.

Once these activities have been completed, a report will be sent to NMOCD and BLM 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 that reads "Kyle Norman" followed by a horizontal line.

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

Attachments:

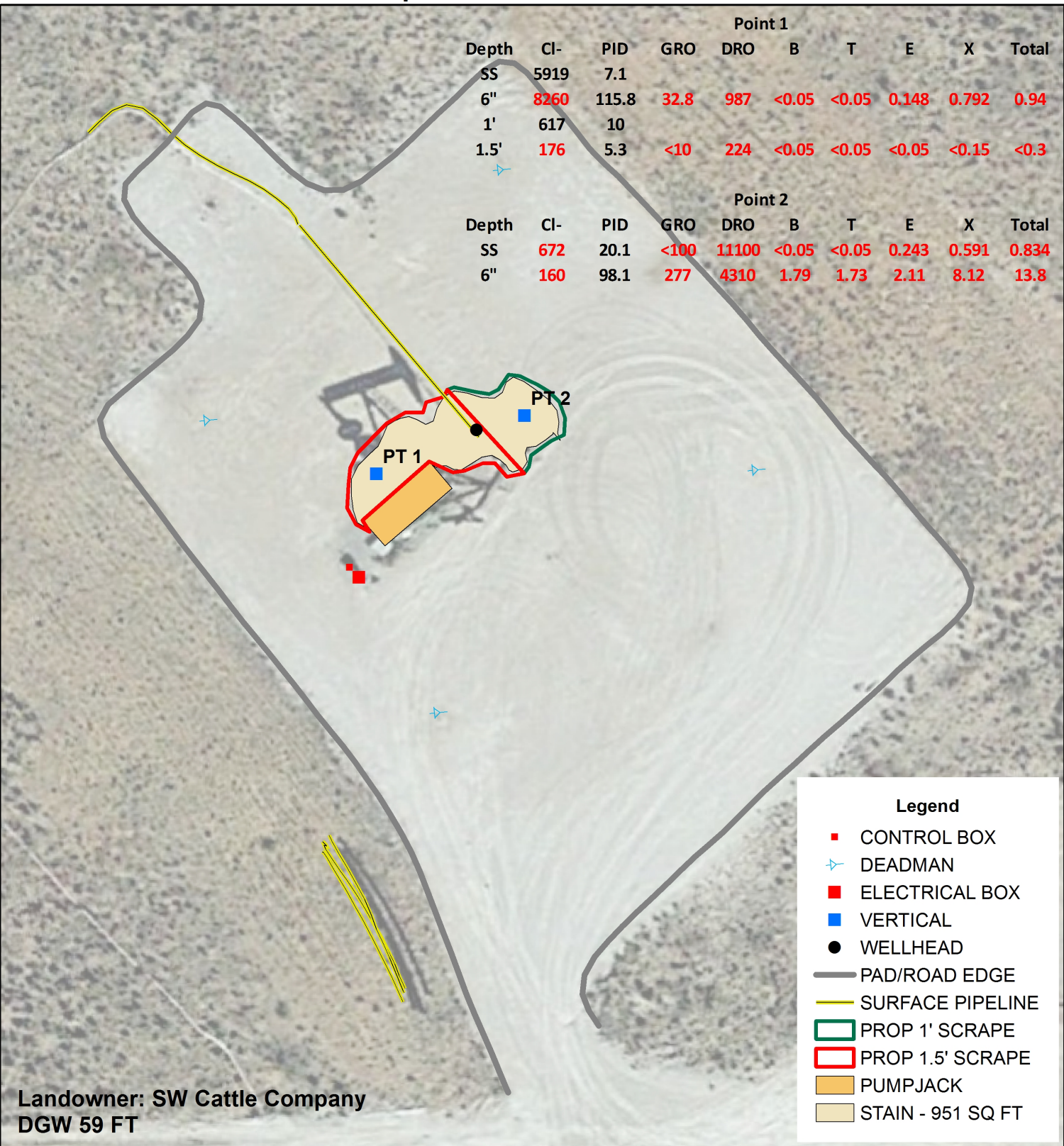
- Figure 1 – Site Map
- Appendix A – Initial C-141
- Appendix B – Laboratory Analysis
- Appendix C – Photo Documentation

Figures

Proposed Excavation

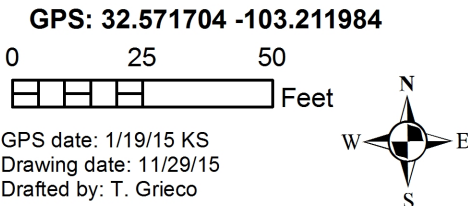
Point 1									
Depth	Cl-	PID	GRO	DRO	B	T	E	X	Total
SS	5919	7.1							
6"	8260	115.8	32.8	987	<0.05	<0.05	0.148	0.792	0.94
1'	617	10							
1.5'	176	5.3	<10	224	<0.05	<0.05	<0.05	<0.15	<0.3

Point 2									
Depth	Cl-	PID	GRO	DRO	B	T	E	X	Total
SS	672	20.1	<100	11100	<0.05	<0.05	0.243	0.591	0.834
6"	160	98.1	277	4310	1.79	1.73	2.11	8.12	13.8



CONOCOPHILLIPS
SEMU 180
(1RP-3500)
LEGALS: UL/ L SEC. 13
T-20-S R-37-E
LEA COUNTY, NM

Figure 1



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
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505
JAN 12 2015
RECEIVED

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: Spencer Cluff	
Address: 1410 N West Country Road	Telephone No. 575-746-7248	
Facility Name: SEMU 180	Facility Type: Well	
Surface Owner: NMOCD	Mineral Owner: BLM	API No. 30-025-39189

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
L	13	20S	37E	2139	South	501	West	LEA

Latitude 32.5717013416412 Longitude 103.211970896631

NATURE OF RELEASE

Type of Release: Spill	Volume of Release: 6.57 BBLS	Volume Recovered: 3 BBLS
Source of Release: transfer pump intake line	Date and Hour of Occurrence 01/09/2015 7:30 am	Date and Hour of Discovery 01/09/2015 12:00 pm
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Tomas Oberding Solomon Hughes	
By Whom? Spencer Cluff	Date and Hour: 01/12/2015 10:35 am	
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.*

Describe Cause of Problem and Remedial Action Taken.*

ENV - Agency Reportable - 6.57 BBLS - SEMU 180 - RR II - MCBU - Hobbs: On Friday, January 9, 2015 a leak at the SEMU 180 occurred. A valve on production tubing was open and pressure gauge froze, spilling fluid on the ground.

Describe Area Affected and Cleanup Action Taken.*

The spill area was 32 ft. x 60 ft. x 2 inches in depth with 3 bbls recovered for a total of 6.57 bbls. The 3 bbls recovered were 1 BPW and 2 BO. This spill remained on the caliche pad. The area will be remediated according to NMOCD guidelines.

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: <i>Spencer A. Cluff</i>		OIL CONSERVATION DIVISION	
Printed Name: Spencer A. Cluff		Approved by Environmental Specialist:	
Title: LEAD HSE		Approval Date: 1-12-15	Expiration Date: 3-12-15
E-mail Address: spencer.a.cluff@conocophillips.com		Conditions of Approval: <i>Site Supervisor report Review E-mail sent to NMOCD Submit Final C-141 3-12-15</i>	
Date: 01/09/2015	Phone: 575-746-7248	Attached <input type="checkbox"/> IRP-3500	

* Attach Additional Sheets If Necessary

JAN 13 2015

7701501240426
P701501241144

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

November 18, 2015

KYLE NORMAN

Basin Environmental Service

P.O. Box 301

Lovington, NM 88260

RE: SEMU #180

Enclosed are the results of analyses for samples received by the laboratory on 11/17/15 14:20.

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: 11/17/2015
Reported: 11/18/2015
Project Name: SEMU #180
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 11/17/2015
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Celey D. Keene

Sample ID: PT. 1 @ 6" (H503035-01)

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	11/18/2015	ND	1.64	82.2	2.00	16.6	
Toluene*	<0.050	0.050	11/18/2015	ND	1.77	88.7	2.00	16.9	
Ethylbenzene*	0.148	0.050	11/18/2015	ND	1.58	79.1	2.00	16.1	
Total Xylenes*	0.792	0.150	11/18/2015	ND	4.91	81.8	6.00	16.4	
Total BTX	0.940	0.300	11/18/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 126 % 73.6-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	8260	16.0	11/18/2015	ND	416	104	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	32.8	10.0	11/17/2015	ND	203	102	200	1.70	
DRO >C10-C28	987	10.0	11/17/2015	ND	196	98.1	200	4.55	

Surrogate: 1-Chlorooctane 95.4 % 35-147

Surrogate: 1-Chlorooctadecane 105 % 28-171

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: 11/17/2015
Reported: 11/18/2015
Project Name: SEMU #180
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 11/17/2015
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Celey D. Keene

Sample ID: PT. 1 @ 1.5' (H503035-02)

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	11/18/2015	ND	1.64	82.2	2.00	16.6	
Toluene*	<0.050	0.050	11/18/2015	ND	1.77	88.7	2.00	16.9	
Ethylbenzene*	<0.050	0.050	11/18/2015	ND	1.58	79.1	2.00	16.1	
Total Xylenes*	<0.150	0.150	11/18/2015	ND	4.91	81.8	6.00	16.4	
Total BTX	<0.300	0.300	11/18/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 102 % 73.6-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	176	16.0	11/18/2015	ND	416	104	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	11/17/2015	ND	203	102	200	1.70	
DRO >C10-C28	224	10.0	11/17/2015	ND	196	98.1	200	4.55	

Surrogate: 1-Chlorooctane 94.8 % 35-147

Surrogate: 1-Chlorooctadecane 102 % 28-171

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*=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: 11/17/2015
Reported: 11/18/2015
Project Name: SEMU #180
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 11/17/2015
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Celey D. Keene

Sample ID: PT. 2 @ SURFACE (H503035-03)

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	11/18/2015	ND	1.64	82.2	2.00	16.6	
Toluene*	<0.050	0.050	11/18/2015	ND	1.77	88.7	2.00	16.9	
Ethylbenzene*	0.243	0.050	11/18/2015	ND	1.58	79.1	2.00	16.1	
Total Xylenes*	0.591	0.150	11/18/2015	ND	4.91	81.8	6.00	16.4	
Total BTEX	0.834	0.300	11/18/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 117 % 73.6-140

Chloride, SM4500CI-B		mg/kg	Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	672	16.0	11/18/2015	ND	416	104	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	11/18/2015	ND	203	102	200	1.70		
DRO >C10-C28	11100	100	11/18/2015	ND	196	98.1	200	4.55		

Surrogate: 1-Chlorooctane 104 % 35-147

Surrogate: 1-Chlorooctadecane 405 % 28-171

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*=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: 11/17/2015
Reported: 11/18/2015
Project Name: SEMU #180
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 11/17/2015
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Celey D. Keene

Sample ID: PT. 2 @ 6" (H503035-04)

BTEx 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	1.79	1.00	11/18/2015	ND	1.64	82.2	2.00	16.6	
Toluene*	1.73	1.00	11/18/2015	ND	1.77	88.7	2.00	16.9	
Ethylbenzene*	2.11	1.00	11/18/2015	ND	1.58	79.1	2.00	16.1	
Total Xylenes*	8.12	3.00	11/18/2015	ND	4.91	81.8	6.00	16.4	
Total BTEX	13.8	6.00	11/18/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 106 % 73.6-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	160	16.0	11/18/2015	ND	416	104	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	277	50.0	11/18/2015	ND	203	102	200	1.70	
DRO >C10-C28	4310	50.0	11/18/2015	ND	196	98.1	200	4.55	

Surrogate: 1-Chlorooctane 127 % 35-147

Surrogate: 1-Chlorooctadecane 144 % 28-171

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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

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Appendix C

Photo Documentation

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

ConocoPhillips SEMU #180

Unit Letter L, Section 13, T20S, R37E



Initial release area, facing northwest

1/19/15



Initial release area, facing south

1/19/15



Initial release area, facing north

1/19/15