

**RECEIVED**

*By JKeyes at 2:31 pm, May 23, 2016*



**APPROVED**

# CONOCOPHILLIPS

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

**ABO 13-10**  
(1RP-3737)

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## Corrective Action Plan

API No. 30-025-03070

Release Date: July 15<sup>th</sup>, 2015

Unit Letter E, Section 4, Township 18S, Range 35E



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

**May 23<sup>rd</sup>, 2016**

**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 Abo 13-10 (1RP-3737)  
UL/E sec. 4 T18S R35E  
API No. 30-025-03070**

Mr. Keyes:

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

**Background and Previous Work**

The site is located approximately 2.8 miles southeast of Buckeye, New Mexico at UL/E sec. 21 T17S R35E. NM OSE and Basin installed monitor well records indicate that groundwater will likely be encountered at a depth of approximately 67 +/- feet.

On June 15<sup>th</sup>, 2015, CoP discovered a release from a steel flow line. A total of 8 barrels of oil and 2 barrels of produced water was released over 5,178 sq ft of pasture with 4 barrels of oil and 1 barrel of produced water recovered. NMOCD was notified of the release on July 16<sup>th</sup>, 2015, and an initial C-141 was submitted and approved by NMOCD the same day (Appendix A).

On July 30<sup>th</sup>, 2015, Basin personnel were on site to assess the release. On May 19<sup>th</sup>, 2016 Two points within the release area were sampled with depth (Figure 1). All samples were field tested for chlorides and organic vapors, and representative samples were taken to a commercial laboratory for analysis (Appendix B).

Photo Documentation of these activities may be found in Appendix C.

**Corrective Action Plan**

Based on the assessment, the release will be excavated down to 3 ft bgs. Representative wall samples will be taken to a commercial laboratory to confirm that all constituents are below regulatory standards. There are buried and surface lines running throughout the release. To

provide for the safety of people and equipment at the site, the excavation will remain 5 ft away from the buried and surface lines.

All excavated soil will be taken to a NMOCD approved facility for disposal. Clean soil will be imported to the site to serve as backfill. A sample of the backfill soil will be taken to a commercial laboratory to confirm that the chloride reading is below regulatory standards. The pasture will be backfilled with clean, imported top soil. The site will be contoured to the surrounding location. The pasture area will be seeded with a blend of native vegetation.

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, reading "Kyle Norman" with a long horizontal flourish extending to the right.

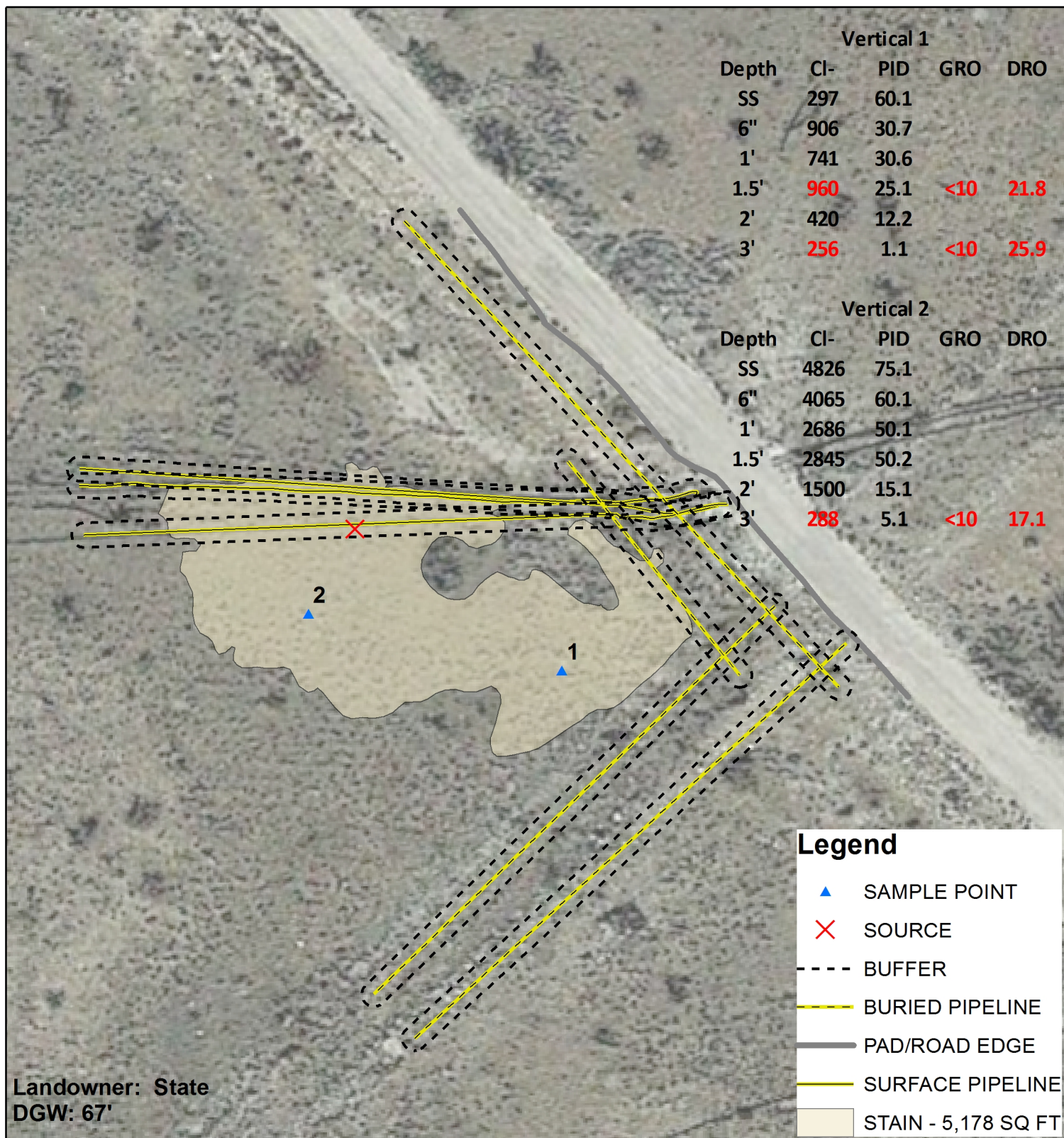
Kyle Norman  
Project Lead  
Basin Environmental Service Technologies  
(575) 942-8542

Attachments:

- Figure 1 – Initial sampling data
- Appendix A – Initial C-141
- Appendix B – Laboratory Analysis
- Appendix C – Photo Documentation

# Figures

# Initial Sampling Data



**CONOCOPHILLIPS**  
**ABO 13-10**  
1RP-3737

UL E SECTION 4  
T-18-S R-35-E  
LEA COUNTY, NM

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

GPS Source: 32.777516 -103.467643

0 10 20

HHH Feet

GPS date: 7/30/15 CF

Drawing date: 7/31/15

Drafted by: T. Grieco



# 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

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: <b>ConocoPhillips</b>	Contact: <b>Spencer Cluff</b>
Address: <b>29 Vacuum Complex Lane</b>	Telephone No. <b>575-746-7248</b>
Facility Name: <b>Abn 13-10</b>	Facility Type: <b>Well</b>

Surface Owner: <b>NMOCD</b>	Mineral Owner: <b>BLM</b>	API No. <b>30-025-03070</b>
-----------------------------	---------------------------	-----------------------------

### LOCATION OF RELEASE

Unit Letter <b>J</b>	Section <b>5</b>	Township <b>18S</b>	Range <b>35E</b>	Feet from the <b>1980</b>	North/South Line <b>South</b>	Feet from the <b>2310</b>	East/West Line <b>East</b>	County <b>LEA</b>
-------------------------	---------------------	------------------------	---------------------	------------------------------	----------------------------------	------------------------------	-------------------------------	----------------------

Latitude 32.7751007 Longitude 103.4787369 NAD83

### NATURE OF RELEASE

Type of Release: <b>Spill</b>	Volume of Release: <b>10 BBLS</b>	Volume Recovered: <b>5 BBLS</b>
Source of Release: <b>Flow line</b>	Date and Hour of Occurrence <b>07/15/2015 4:00 am</b>	Date and Hour of Discovery <b>07/15/2015 10:10 am</b>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <b>Jamie Keyes</b>	
By Whom? <b>Spencer Cluff</b>	Date and Hour: <b>07/16/2015 2:20 pm</b>	
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.\*

On July 15, 2015 at 1010 hrs MDT, a discharge of 8 bbls oil and 2 bbls produced water occurred on the ABO 13-10 flow line with 4 bbls oil and 1 bbls produced water recovered.

Describe Area Affected and Cleanup Action Taken.\*

Immediate action by the MSO was to shut down the well and isolate the flowline. A work ordered has been submitted to repair the line. The affected 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.

### OIL CONSERVATION DIVISION

Signature: <i>Spencer A. Cluff</i>	Approved by Environmental Specialist: <i>Jamie Keyes</i>	
Printed Name: <b>Spencer A. Cluff</b>		
Title: <b>LEAD HSE</b>	Approval Date: <b>07/16/2015</b>	Expiration Date: <b>10/16/2015</b>
E-mail Address: <b>spencer.a.cluff@conocophillips.com</b>	Conditions of Approval: <b>Discrete site samples required. Delineate and remediate per NMOCD guides. Geotagged photos of remediation required.</b>	Attached <input type="checkbox"/> <b>ogrid 217817 1RP 3737</b>
Date: <b>07/16/2015</b>	Phone: <b>575-746-7248</b>	

\* Attach Additional Sheets If Necessary

nJXK1519752626

pJXK1519752854

# 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

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May 23, 2016

KYLE NORMAN

Basin Environmental Service

P.O. Box 301

Lovington, NM 88260

RE: ABO 13-10 (1RP-3737)

Enclosed are the results of analyses for samples received by the laboratory on 05/20/16 8:05.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-15-7. 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](http://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:**

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

Received: 05/20/2016  
Reported: 05/23/2016  
Project Name: ABO 13-10 (1RP-3737)  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 05/19/2016  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: VERTICAL 1 @ 3' (H601101-01)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	256	16.0	05/20/2016	ND	416	104	400	3.77	
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	05/20/2016	ND	188	94.2	200	1.60	
DRO >C10-C28	25.9	10.0	05/20/2016	ND	208	104	200	4.73	
Surrogate: 1-Chlorooctane									
	71.5 %	35-147							
Surrogate: 1-Chlorooctadecane									
	90.7 %	28-171							

**Sample ID: VERTICAL 2 @ 3' (H601101-02)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	288	16.0	05/20/2016	ND	416	104	400	3.77	
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	05/20/2016	ND	188	94.2	200	1.60	
DRO >C10-C28	17.1	10.0	05/20/2016	ND	208	104	200	4.73	
Surrogate: 1-Chlorooctane									
	73.5 %	35-147							
Surrogate: 1-Chlorooctadecane									
	93.6 %	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: 05/20/2016  
Reported: 05/23/2016  
Project Name: ABO 13-10 (1RP-3737)  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 05/19/2016  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: VERTICAL 1 @ 1.5' (H601101-03)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	960	16.0	05/20/2016	ND	416	104	400	3.77	
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	05/20/2016	ND	188	94.2	200	1.60	
DRO >C10-C28	21.8	10.0	05/20/2016	ND	208	104	200	4.73	
Surrogate: 1-Chlorooctane									
	74.7 %	35-147							
Surrogate: 1-Chlorooctadecane									
	97.7 %	28-171							

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

**Notes and Definitions**

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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Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



ARDINAL 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

Company Name: ConocoPhillips  
Project Manager: Kyle Norman

Address: 419 W Cain

City: Hobbs

Phone #: 575-393-2967

Project #:

Project Name:

Project Location:

Sample Name:

FOR LAB USE ONLY

P.O. #:

Company: Basin

Attn:

Address: 419 W Cain

City: Hobbs

State: NM Zip: 88240

Phone #: 575-393-2967

Fax #: 575-393-0293

ANALYSIS REQUEST

Chlorides

TPH 8015 M

BTEX

Texas TPH

Complete Cations/Anions

TDS

Lab I.D.

Sample I.D.

Altitude

1 Well 1 @ 3'  
2 Well 2 @ 3'  
3 Well 1 @ 1.5'

(G)RAB OR (C)OMP.

# CONTAINERS

GROUNDWATER

WASTEWATER

SOIL

OIL

SLUDGE

OTHER :

ACID/BASE:

ICE / COOL

OTHER :

DATE

TIME

5-19-16 1:30  
5-19-16 2:30  
5-19-16 1:45

MATRIX

PRESERV

SAMPLING

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 the client for the analysis. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits 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.

Relinquished By:

Date: 5-24-16

Received By:

Relinquished By:

Date: 5-25-16

Received By:

Delivered By: (Circle One)

Sampler - UPS - Bus - Other:

Sample Condition  
☒ Cool ☒ Intact  
☐ Yes ☐ No

CHECKED BY: (Initials)

Phone Result: ☐ Yes ☒ No Add'l Phone #:  
Fax Result: ☐ Yes ☒ No Add'l Fax #:

REMARKS:

email results: T.Grisco@basinenr.com  
knorman@basinenr.com; jkamlain@basinenr.com

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

Corrected - 10.00



# Appendix C

Photo Documentation

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

**Conoco Phillips ABO 13-10 (1RP-3737)**  
**Unit E, Section 4, T-18-S, R-35-E**



Initial release facing west 7/30/15



Initial release facing east 7/30/15



Initial release facing north 7/30/15



Initial release facing north west 7/30/15



Excavating vertical 1 facing south west 5/19/16



Excavating vertical 2 facing north west 5/19/16