**RECEIVED** By JKeyes at 9:25 am, Jul 11, 2016





### **CONOCOPHILLIPS**

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

## EVGSAU Satellite #05 (1RP-3775)

# Corrective Action Plan

API No. 30-025-26395

Release Date: August 3<sup>rd</sup>, 2015

Unit Letter F, Section 26, Township 17S, Range 35E



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

July 7<sup>th</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 EVGSAU Satellite 5 (1RP-3755) UL/F sec. 26 T17S R35E API No. 30-025-26395

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 4.3 miles east of Buckeye, New Mexico at UL/F sec. 26 T17S R35E. NM OSE, BLM and Basin installed monitor well records indicate that groundwater will likely be encountered at a depth of approximately 57 +/- feet.

On August 3<sup>rd</sup>, 2015, CoP discovered a release from a transfer pump. A total of 31 barrels of produced water and 1 barrel of oil was released over 13,268 sq ft of caliche pad and pasture land. 29 barrels of produce water and 1 barrel of oil was recovered. NMOCD was notified of the release on August 3<sup>th</sup>, 2015, and an initial C-141 same day. NMOCD approved the initial C-141 on August 4<sup>th</sup>, 2015 (Appendix A).

Basin personnel were on site to assess the release August 8<sup>th</sup>, 2015. The release was mapped and photographed (Figure 1). On May 26<sup>th</sup>, 2016, samples were taken at the surface and with depth using a hand augur. On June 28<sup>th</sup>, 2016 verticals were installed at point 1-3 and all samples were field tested for chlorides and organic vapors. 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 area in the facility will be hand shoveled to 6" due to safety concerns with mechanical equipment in the facility, discreet bottom samples will be collected in

the 6" scrape. The release area around points 1, 2 & 3 will be excavated to a depth of 3.5ft bgs and at the base of the excavation around points 1 & 3 a 6" clay layer liner will be installed and properly seated throughout the excavation. Once the excavation is completed, discreet samples from the wall of all excavations 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) and Diesel Range Organics (DRO) readings below regulatory standards, the wall will be extended until field testing indicates that all constituents from the wall samples will return values below regulatory standards. Representative samples will then be taken to a commercial laboratory to confirm that all constituents return readings 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 3 to 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 lease pad will be backfilled with clean, imported caliche. The site will be 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,

hyle Norma\_

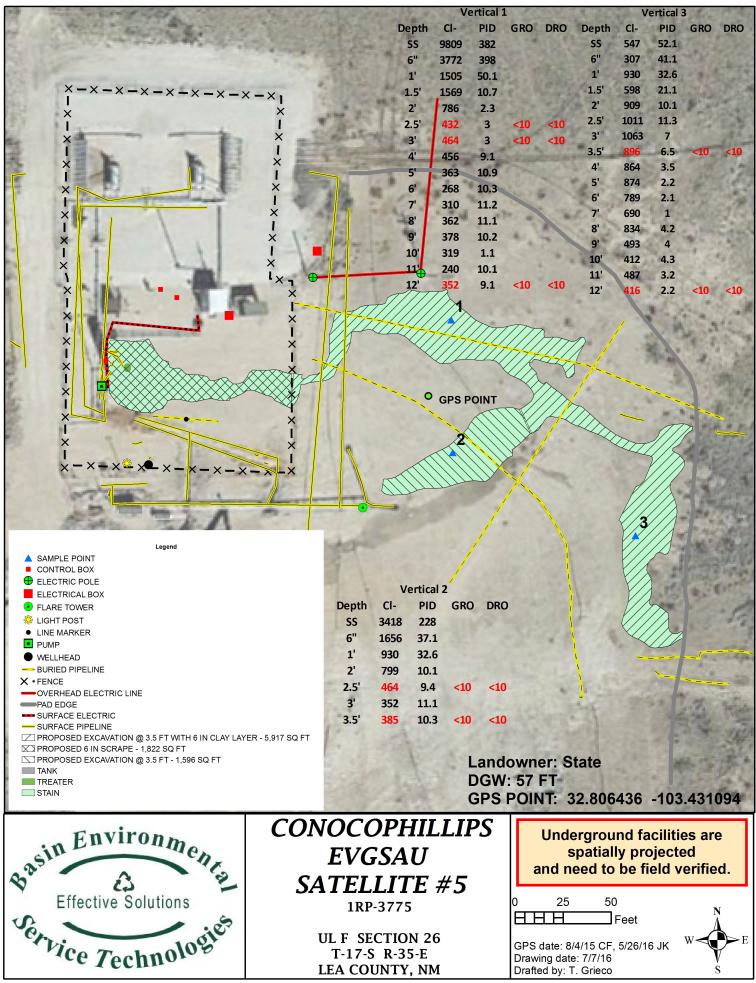
Kyle Norman Project Lead Basin Environmental Service Technologies (575) 942-8542

Attachments: Figure 1 – Proposed Excavation Appendix A – Initial C-141 Appendix B – Laboratory Analysis Appendix C – Photo Documentation

# Figures

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

### **Proposed Excavation**



## Appendix A Intial C-141

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

Form C-141 Revised August 8, 2011

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

			Rele	ease Notific	cation	and Co	orrective A	ction	l .			
						<b>OPERA</b>	the second se		🛛 Initi	al Report		] Final Repor
Name of Co						Contact: Ja						
Address: 29 Facility Nar						Telephone No. 575-704-2455 Facility Type: Well						
				110 10		tuonity Typ	. wen		1			
Surface Ow	ner: NMO	CD		Mineral C	Jwner:				API No	. 30-025-2	2639	5
			· · · · · · · · · · · · · · · · · · ·			OF RE	LEASE					
Unit Letter F	Section 26	Township 17S	Range 35E	Feet from the 2496	North/ North	South Line	Feet from the 1544	East/V West	West Line	County LEA		
Latitude 3	2.8062592	Longitu	<b>ide</b> 10	3.431839 NAD8 <b>NAT</b>		OF REL	EASE					
Type of Rele	ase: Leak					Volume of	Release: 31 bbl.			Recovered. 3		
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Source of ite	icuse. ITum	nei pump ie.	an			100-100 Bill 60 YO ST	15 3:30 am	~		)15 3:30 a		y
Was Immedia	ate Notice G		Yes 🗌	No 🗌 Not Re	equired	If YES, To Tomas Ob						
By Whom? J	and the second se						Hour: 08/03/2015					
Was a Water	course Reac	hed?	Yes 🛛	No		If YES, Vo	olume Impacting	the Wate	ercourse.			
August 03 MSO arriv and 1 bbl in additior	8, 2015 at red on loo of oil, wit n to the re on. The a	t 0330 MD cation and h 29 bbls eleased flu ffected an	T, at E l observ of produ uid. Imm	/GSAU Sate ed transfer p uced water a lediate action	llite 5, oump h nd 1 bl n was t	MSO rec ad failed bl of oil re o isolate f	By OCD D e 5 – RR II – eived a callou resulting in a covered. 10 the pump and IMOCD and 0	MCB ut for E releas bbls o d turn	U – Buc EVGSAL se of 31 f rainwa in a wor	keye – O J Satellite bbls of p ter was a k order fo	n Me 5 s rodu Iso i or re	onday hutdown. iced water recovered pair and
I hereby certi regulations al public health should their co or the environ	fy that the in l operators a or the enviro operations ha ment. In ac	PW & 1BO iche pad. S information gi are required to onment. The ave failed to a idition, NMO	ven above o report an acceptance idequately OCD accep	i with 40BBLS will be remed is true and comp d/or file certain r e of a C-141 repo investigate and r	lete to the elease not ort by the emediate	e best of my otifications as NMOCD m contaminati	0 of those BBI knowledge and u nd perform correc arked as "Final R on that pose a thr e the operator of	inderstar ctive acti eport" d reat to gr	nd that purs ions for rel loes not reli	suant to NM eases which ieve the ope r. surface wa	OCD may rator	rules and endanger of liability uman health
federal, state,	or local law	s and/or regu	nations.				OIL CON	CEDV	ATION	DIVICIO	NT.	
							OIL CON	SERV	ATION	DIVISIC	<u>JN</u>	
Signature: 9a Printed Name		i.			ŀ	Approved by	Environmental S	pecialis	t: Jami	¥lhye		

Title: LEAD HSE		Approval Date: 08/04/2015	Expiration	on Date: 10/04/2015			
E-mail Address: jay.c.garcia	Dconocophillips.com	Conditions of Approval:					
		Discrete site samples required. D remediate per NMOCD guidelin		Attached			
Date: 08/03/2015	Phone:575-704-2455	Geotagged photos of remediation	n required.	ogrid 217817	1RP 3775		

pJXK1521626889 nJXK1521626690

### Appendix B Laboratory Analysis

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



July 06, 2016

KYLE NORMAN Basin Environmental Service P.O. Box 301 Lovington, NM 88260

RE: EVGSAU SAT #5

Enclosed are the results of analyses for samples received by the laboratory on 07/05/16 11:15.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-16-8. 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 <a href="https://www.tceq.texas.gov/field/ga/lab\_accred\_certif.html">www.tceq.texas.gov/field/ga/lab\_accred\_certif.html</a>.

Cardinal Laboratories is accreditated 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,

Celeg D. Keine

Celey D. Keene Lab Director/Quality Manager



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

Received:	07/05/2016	Sampling Date:	06/30/2016
Reported:	07/06/2016	Sampling Type:	Soil
Project Name:	EVGSAU SAT #5	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

#### Sample ID: VERT 1 @ 2.5' (H601483-01)

Chloride, SM4500Cl-B	mg/kg		Analyze	Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	432	16.0	07/06/2016	ND	432	108	400	3.77	
TPH 8015M	mg	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	07/05/2016	ND	190	95.1	200	0.637	
DRO >C10-C28	<10.0	10.0	07/05/2016	ND	177	88.7	200	1.47	
Surrogate: 1-Chlorooctane	66.8	% 35-147							
Surrogate: 1-Chlorooctadecane	69.0	% 28-171							

#### Sample ID: VERT 1 @ 3' (H601483-02)

Chloride, SM4500Cl-B	mg/kg		Analyze	Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	464	16.0	07/06/2016	ND	432	108	400	3.77	
TPH 8015M	mg,	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	07/05/2016	ND	190	95.1	200	0.637	
DRO >C10-C28	<10.0	10.0	07/05/2016	ND	177	88.7	200	1.47	
Surrogate: 1-Chlorooctane	78.5	% 35-147	,						
Surrogate: 1-Chlorooctadecane	81.6	% 28-171							

#### **Cardinal Laboratories**

#### \*=Accredited Analyte

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Celey D. Keine

Celey D. Keene, Lab Director/Quality Manager



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

Received:	07/05/2016	Sampling Date:	06/30/2016
Reported:	07/06/2016	Sampling Type:	Soil
Project Name:	EVGSAU SAT #5	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

#### Sample ID: VERT 1 @ 12' (H601483-03)

Chloride, SM4500Cl-B	mg/kg		Analyze	Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	352	16.0	07/06/2016	ND	432	108	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	07/05/2016	ND	190	95.1	200	0.637	
DRO >C10-C28	<10.0	10.0	07/05/2016	ND	177	88.7	200	1.47	
Surrogate: 1-Chlorooctane	78.4	% 35-147	7						
Surrogate: 1-Chlorooctadecane	80.9	% 28-171							

#### Sample ID: VERT 2 @ 2.5' (H601483-04)

Chloride, SM4500Cl-B	mg/kg		Analyze	Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	464	16.0	07/06/2016	ND	432	108	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	07/05/2016	ND	190	95.1	200	0.637	
DRO >C10-C28	<10.0	10.0	07/05/2016	ND	177	88.7	200	1.47	
Surrogate: 1-Chlorooctane	54.2	% 35-147	7						
Surrogate: 1-Chlorooctadecane	57.0	% 28-171	,						

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Celeg D. Keene

Celey D. Keene, Lab Director/Quality Manager



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

Received:	07/05/2016	Sampling Date:	06/30/2016
Reported:	07/06/2016	Sampling Type:	Soil
Project Name:	EVGSAU SAT #5	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

#### Sample ID: VERT 2 @ 3.5' (H601483-05)

Chloride, SM4500Cl-B	mg/kg		Analyze	Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	384	16.0	07/06/2016	ND	432	108	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	07/05/2016	ND	190	95.1	200	0.637	
DRO >C10-C28	<10.0	10.0	07/05/2016	ND	177	88.7	200	1.47	
Surrogate: 1-Chlorooctane	70.4	% 35-147							
Surrogate: 1-Chlorooctadecane	73.5	% 28-171							

#### Sample ID: VERT 3 @ 3.5' (H601483-06)

Chloride, SM4500Cl-B	mg/kg		Analyze	Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	896	16.0	07/06/2016	ND	432	108	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	07/05/2016	ND	190	95.1	200	0.637	
DRO >C10-C28	<10.0	10.0	07/05/2016	ND	177	88.7	200	1.47	
Surrogate: 1-Chlorooctane	71.3	% 35-147	7						
Surrogate: 1-Chlorooctadecane	67.3	% 28-171							

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Celeg D. Keene

Celey D. Keene, Lab Director/Quality Manager



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

Received:	07/05/2016	Sampling Date:	06/30/2016
Reported:	07/06/2016	Sampling Type:	Soil
Project Name:	EVGSAU SAT #5	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

#### Sample ID: VERT 3 @ 12' (H601483-07)

Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	416	16.0	07/06/2016	ND	432	108	400	3.77	
TPH 8015M	mg,	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	07/05/2016	ND	190	95.1	200	0.637	
DRO >C10-C28	<10.0	10.0	07/05/2016	ND	177	88.7	200	1.47	
Surrogate: 1-Chlorooctane	78.6	% 35-147	,						
Surrogate: 1-Chlorooctadecane	78.4	% 28-171							

#### **Cardinal Laboratories**

\*=Accredited Analyte

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Celey D. Keine

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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Celeg D. Keene

Celey D. Keene, Lab Director/Quality Manager

Project Manager: Kyle Norman	P.0.#				ANA	ANALYSIS		REQUEST	F	
Address: 419 W Cain	Company: Basin				;			_		
City: Hobbs State: NM Zip: 88240	Attn:				ons					_
575-393-2967 Fax #: 575-39:	Address: 419 W Cain			_	nic					_
Project #: Project Owner:	City: Hobbs	_	VI	1	/A				_	
Project Name:	State: NM Zip: 88240				ns			_		
Project Location: EllarSAtis Sut S	Phone #: 575-393-2967	-	E)	-	tic	S				_
sampler Name: Stanolaur	Fax #: 575-393-0293	-		-	Ca	TC				_
D. MATRIX	PRESERV. SAMPLING	Ch	PH E	ex	e (					
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	CHECKED BY:						(			
T Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476 $\#  7\kappa$										
	05-393-2476									

### Page 7 of 7

### Appendix C Photo Documentation

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

## Conocophillips EVGSAU Satellite #005 Unit Letter F, Section 26, T17S, R35E



Initial Site Photo, Facing North West

8/4/15



Installing Vertical, Facing East

6/28/16



Initial Site Photo, Facing South East

8/4/15



Installing Vertical, Facing North West

6/29/16