



RECEIVED

By JKeyes at 8:34 am, Jul 25, 2016

APPROVED

CONOCOPHILLIPS

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

MCA Battery #4 (1RP-3822)

Corrective Action Plan

API No. 30-025-0058300

Release Date: August 22nd, 2015

Unit Letter A, Section 26, Township 17S, Range 32E



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

July 19th, 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 MCA Battery #4 (1RP-3822)
UL/A sec. 26 T17S R32E
API No. 30-025-0058300**

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 3.5 miles southeast of Maljamar, New Mexico. The initial C-141 states that the site is located at UL/C Sec. 16 T17S R35E. However, GIS mapping shows the site to be located within UL/A Sec. 26 T17S R32E. NM OSE, BLM and Basin installed monitor well records indicate that groundwater will likely be encountered at a depth of approximately 69 +/- feet.

On August 22nd, 2015, CoP discovered a release from a transfer pump intake line. A total of 6.1 produced water was released over 4,790 sq ft of caliche pad and pasture land. 1 barrel produced water was recovered. BLM and NMOCD were notified of the release on August 22nd, 2015, and an initial C-141 was submitted to both parties the same day. NMOCD approved the initial C-141 on August 28th, 2015 (Appendix A).

Basin personnel were on site to assess the release August 25th, 2015. The release was mapped and photographed (Figure 1). On June 8th, 2016 Field samples were collected at surface. On July 11th, 2016, 4 verticals were installed. Samples were taken with depth and representative samples were sent to a commercial laboratory for analysis (Appendix B). Laboratory analysis of Point 1 at 6" returned a chloride value of 48 mg/kg, Gasoline Range Organics (GRO), Diesel Range Organics (DRO) and BTEX values of non-detect. Laboratory analysis of Point 2 at 6" returned a chloride reading of 32 mg/kg, Gasoline Range Organics (GRO), Diesel Range Organics (DRO) and BTEX values of non-detect. Laboratory analysis of Point 3 at 3' returned a chloride value of 32 mg/kg, Gasoline Range Organics (GRO), Diesel Range Organics (DRO) and BTEX values of

non-detect. Laboratory analysis of Point 4 at 6" returned a chloride value of 32 mg/kg, Gasoline Range Organics (GRO), Diesel Range Organics (DRO) and BTEX values of non-detect.

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

Corrective Action Plan

Based on the assessment, the release area around point 1,2 &4 will be excavated to a depth of 6 inches bgs. The release area around point 3 will be excavated to a depth of 3 feet bgs. Once all excavations are complete, discrete wall samples from all excavations will be collected and field tested for chlorides and organic vapors. If the field data indicates that the wall samples will not achieve chloride, Gasoline Range Organics (GRO), Diesel Range Organics (DRO) and BTEX readings below regulatory standards, the walls of the excavation will be extended until field testing indicates that all constituents from the wall samples will return values below regulatory standards. The 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 and the pasture will be backfilled with clean, imported top soil. The site will be contoured to the surrounding location.

Revegetation of the site will be performed as follows:

Disturbed areas associated with the remediation efforts will be reseeded. If after one growing season the vegetation has not taken hold, seeding may need to be repeated until revegetation is successful. The seed will be spread using a hand-held broadcaster and the area raked or dragged to cover the seed. Because the seed will be broadcast, the pounds per acre will be doubled. BLM #2 seed mix will be used.

The seed mixture will be planted in the amounts specified in pounds of pure live seed (PLS) per acre. Commercially sold seed will be either certified or registered. The area will be seeded following backfilling of the excavated area.

The site will be visited on a quarterly basis to assess the establishment of vegetative growth. Staff personnel performing the site visit will also look for the presence of noxious weeds at the site. If a noxious weed is observed at the site, CoP will determine the most effective manner to eradicate it.

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 dark ink, reading "Kyle Norman" followed by a horizontal line.

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

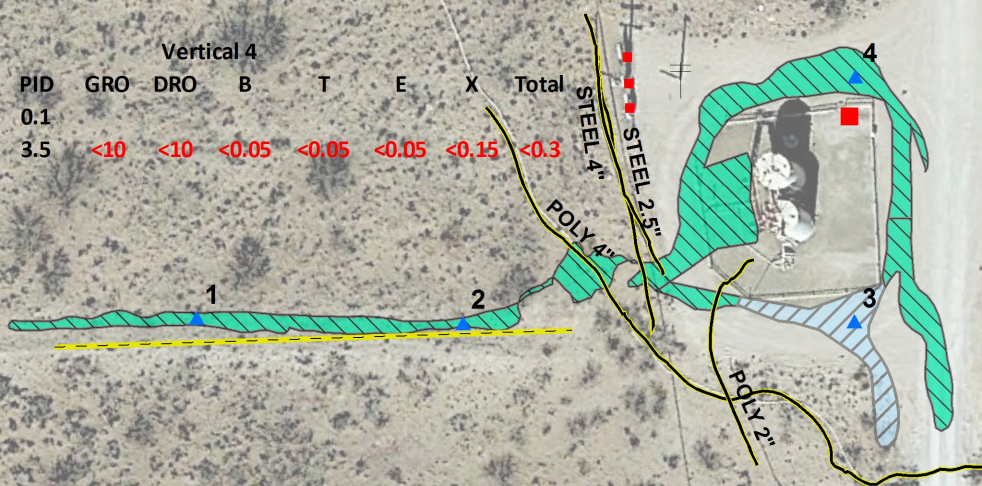
Proposed Excavation

Vertical 1									
Depth	CI-	PID	GRO	DRO	B	T	E	X	Total
SS	3699	3.7							
6"	48	5.9	<10	<10	<0.05	<0.05	<0.05	<0.15	<0.3

Vertical 2									
Depth	CI-	PID	GRO	DRO	B	T	E	X	Total
SS	1123	11.3							
6"	32	20.6	<10	<10	<0.05	<0.05	<0.05	<0.15	<0.3

Vertical 3									
Depth	CI-	PID	GRO	DRO	B	T	E	X	Total
SS	1059	51.3							
6"	786	10							
1'	814	10							
1.5'	671	10.1							
2'	823	7.1							
2.5'	985	2.1							
3'	32	1	<10	<10	<0.05	<0.05	<0.05	<0.15	<0.3

Vertical 4									
Depth	CI-	PID	GRO	DRO	B	T	E	X	Total
SS	788	0.1							
6"	32	3.5	<10	<10	<0.05	<0.05	<0.05	<0.15	<0.3



Landowner: State Lease to Olane Caswell
DGW: 69 ft

Imagery date: 2/13/14

Legend

- ▲ SAMPLE POINT
- CONTROL BOX
- ELECTRICAL BOX
- ⊥ LIGHT POLE
- BURIED PIPELINE
- SURFACE PIPELINE
- ▨ EXCAVATION @ 3 FT - 731 SQ FT
- ▨ SCRAPE @ 6 IN - 4,059 SQ FT



CONOCOPHILLIPS
MCA BATTERY #4
1RP-3822

UL A SECTION 26
T-17-S R-32-E
LEA COUNTY, NM

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

GPS: 32.811869, -103.730914

0 50 100 Feet

GPS date: 8/25/15 KN, 6/8/16 JK

Drawing date: 7/14/16

Drafted by: B. Cooper, 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

RECEIVED

By OCD District 1 at 7:36 am, Aug 28, 2015

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: Jay Garcia
Address: 29 Vacuum Complex Lane	Telephone No. 575-704-2455
Facility Name: MCA Battery #4	Facility Type: Battery
Surface Owner: NMOCD	Mineral Owner: BLM
API No. 30-025-0058300	

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
C	16	17S	35E	660	North	1980	West	LEA

Latitude 32.8400459 - Longitude 103.7736511 NAD83

NATURE OF RELEASE

Type of Release: Spill	Volume of Release: 6.1 BPW	Volume Recovered: 1 BPW
Source of Release: Tank Overflow	Date and Hour of Occurrence 08/22/2015 8:30 am	Date and Hour of Discovery 08/22/2015 8:30 am
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom? Jay Garcia	Date and Hour: 08/22/2015 1:55 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.*

APPROVED

By OCD District 1 at 7:36 am, Aug 28, 2015

ENV – Agency Reportable – 6.1 BPW – MCA Battery 4– RR II – MCBU – Maljamar

On Saturday August 22, 2015 at 0830 MDT, at MCA Battery 4, a spill occurred following a power failure resulting in a release of 6.1 bbl. of produced water with 1 bbl. of produced water recovered. The affected area will be remediated according to BLM, NMOCD and COPC guidelines. This is not a PSE. Consequence: 1, Likelihood: 5, RR: II

Describe Area Affected and Cleanup Action Taken.*

Release of 6.1 barrels produced water released and 1 barrel recovered. Affected area was four type sections for the dimensions to calculate the total of produced water that was released on the ground. A measurement 270'X 4'X 1" equaled 1.3bbbls, 180'X 6'X 1" equaled 1bbbls, 39'X 54'X 1" equaled 2bbbls and 162'X 5'X 1" equaled .8 which a total of 5.1bbbls of produced water was released and a total of 1bbl was recovered which a grand total of 6.1 bbls was release. On caliche pad and pasture and was not contained. The affected area will be remediated according to BLM, NMOCD and COPC 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>Jay Garcia</i>	Approved by Environmental Specialist: <i>Jamie Hager</i>	
Printed Name: Jay Garcia	Approval Date: 08/28/2015	Expiration Date: 10/28/2015
Title: LEAD HSE	Conditions of Approval: Discrete site samples required. Delineate and remediate per NMOCD guidelines. Geotagged photos of remediation required.	
E-mail Address: jay.c.garcia@conocophillips.com	Attached <input type="checkbox"/> IRP 3822 nJXK1524027116 pJXK1524027278	

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

July 19, 2016

KYLE NORMAN

Basin Environmental Service

P.O. Box 301

Lovington, NM 88260

RE: MCA BATTERY #4

Enclosed are the results of analyses for samples received by the laboratory on 07/12/16 15:35.

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 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 fluid and cursive, with the first name "Celey" being more prominent.

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: 07/12/2016
Reported: 07/19/2016
Project Name: MCA BATTERY #4
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 07/11/2016
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: VERT 1 @ 6" (H601557-01)

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	07/12/2016	ND	1.85	92.6	2.00	2.46	
Toluene*	<0.050	0.050	07/12/2016	ND	1.96	98.1	2.00	1.84	
Ethylbenzene*	<0.050	0.050	07/12/2016	ND	1.89	94.6	2.00	2.47	
Total Xylenes*	<0.150	0.150	07/12/2016	ND	5.71	95.2	6.00	1.70	
Total BTX	<0.300	0.300	07/12/2016	ND					

Surrogate: 4-Bromofluorobenzene (PID) 99.8 % 73.6-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	07/13/2016	ND	400	100	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	07/12/2016	ND	161	80.3	200	0.850	
DRO >C10-C28	<10.0	10.0	07/12/2016	ND	165	82.7	200	3.31	

Surrogate: 1-Chlorooctane 83.7 % 35-147

Surrogate: 1-Chlorooctadecane 87.7 % 28-171

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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

Received: 07/12/2016
Reported: 07/19/2016
Project Name: MCA BATTERY #4
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 07/11/2016
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: VERT 2 @ 6" (H601557-02)

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	07/12/2016	ND	1.85	92.6	2.00	2.46		
Toluene*	<0.050	0.050	07/12/2016	ND	1.96	98.1	2.00	1.84		
Ethylbenzene*	<0.050	0.050	07/12/2016	ND	1.89	94.6	2.00	2.47		
Total Xylenes*	<0.150	0.150	07/12/2016	ND	5.71	95.2	6.00	1.70		
Total BTEX	<0.300	0.300	07/12/2016	ND						

Surrogate: 4-Bromofluorobenzene (PID) 101 % 73.6-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	07/13/2016	ND	400	100	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	07/12/2016	ND	161	80.3	200	0.850	
DRO >C10-C28	<10.0	10.0	07/12/2016	ND	165	82.7	200	3.31	

Surrogate: 1-Chlorooctane 84.8 % 35-147

Surrogate: 1-Chlorooctadecane 88.5 % 28-171

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*=Accredited Analyte

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

Received: 07/12/2016
Reported: 07/19/2016
Project Name: MCA BATTERY #4
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 07/11/2016
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: VERT 3 @ 3' (H601557-03)

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	07/12/2016	ND	1.85	92.6	2.00	2.46		
Toluene*	<0.050	0.050	07/12/2016	ND	1.96	98.1	2.00	1.84		
Ethylbenzene*	<0.050	0.050	07/12/2016	ND	1.89	94.6	2.00	2.47		
Total Xylenes*	<0.150	0.150	07/12/2016	ND	5.71	95.2	6.00	1.70		
Total BTEX	<0.300	0.300	07/12/2016	ND						

Surrogate: 4-Bromofluorobenzene (PID) 101 % 73.6-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	07/13/2016	ND	400	100	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	07/12/2016	ND	161	80.3	200	0.850	
DRO >C10-C28	<10.0	10.0	07/12/2016	ND	165	82.7	200	3.31	

Surrogate: 1-Chlorooctane 83.7 % 35-147

Surrogate: 1-Chlorooctadecane 86.1 % 28-171

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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

Received: 07/12/2016
Reported: 07/19/2016
Project Name: MCA BATTERY #4
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 07/11/2016
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: VERT 4 @ 6" (H601557-04)

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	07/12/2016	ND	1.85	92.6	2.00	2.46		
Toluene*	<0.050	0.050	07/12/2016	ND	1.96	98.1	2.00	1.84		
Ethylbenzene*	<0.050	0.050	07/12/2016	ND	1.89	94.6	2.00	2.47		
Total Xylenes*	<0.150	0.150	07/12/2016	ND	5.71	95.2	6.00	1.70		
Total BTEX	<0.300	0.300	07/12/2016	ND						

Surrogate: 4-Bromofluorobenzene (PID) 101 % 73.6-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	07/13/2016	ND	400	100	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	07/12/2016	ND	161	80.3	200	0.850	
DRO >C10-C28	<10.0	10.0	07/12/2016	ND	165	82.7	200	3.31	

Surrogate: 1-Chlorooctane 84.1 % 35-147

Surrogate: 1-Chlorooctadecane 85.8 % 28-171

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.
QM-4X	The spike recovery was outside of QC acceptance limits for the MS and/or MSD due to analyte concentration at 4 times or greater the spike concentration. The QC batch was accepted based on LCS and/or LCSD recoveries within the acceptance limits.
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



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Appendix C

Photo Documentation

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

ConocoPhillips MCA Battery #4

Unit Letter A, Section 26, T17S, R32E



Initial Site Photo, Facing SW

8.25.15



Initial Site Photo, Facing S

8.25.16



Initial Site Photo, Facing NW

8.25.16



Site Photo, Facing E

6.8.16



Installing Vertical 1, Facing E

7.11.16



Installing Vertical 3, Facing NE

7.11.16