

**1RF-454 -
Zia Hills Superman
Recycling Facility and
Containment
fSL2029049637**

**Extension, Cessation of
Operations Approval**

**[217817] CONOCOPHILLIPS
COMPANY
June 9, 2021**

Venegas, Victoria, EMNRD

From: Venegas, Victoria, EMNRD
Sent: Wednesday, June 9, 2021 3:40 PM
To: Lee, Jeremy L; Enviro, OCD, EMNRD
Subject: 1RF-454 - Zia Hills Superman fSL2029049637. Cessation of operation extension request. Approval with conditions.
Attachments: C-147 Approval Extension of cessations of operations 06.09.2021.pdf

1RF-454 - Zia Hills Superman Recycling Facility and Containment , Facility Number [fSL2029049637](#). Cessation of operation extension request. Approval with conditions.

Mr. Lee,

NMOCD has reviewed the determination of cessation of operations extension request for 1RF-454 - Zia Hills Superman Recycling Facility and Containment , Facility Number [fSL2029049637](#), received from [\[217817\]](#) CONOCOPHILLIPS COMPANY on April 15, 2021. The cessation for operations extension request is approved with the following conditions of approval:

- The 1RF-454 - Zia Hills Superman Recycling Facility and Containment , Facility Number [fSL2029049637](#) registration/permit expires on May 28, 2025.
- The 1RF-454 - Zia Hills Superman Recycling Facility and Containment , Facility Number [fSL2029049637](#) extension of cessation of operations is approved from June 30, 2021 through December 31, 2021.
- [\[217817\]](#) CONOCOPHILLIPS COMPANY must recycle at 20% of the total fluid capacity of produced water from 1RF-454 - Zia Hills Superman Recycling Facility and Containment , Facility Number [fSL2029049637](#) no later than December 31, 2021 to be considered in operations.
- [\[217817\]](#) CONOCOPHILLIPS COMPANY will maintain a liquid level in the containment that is at least equal to the weight of the liner plus 20%. [\[217817\]](#) CONOCOPHILLIPS COMPANY may maintain a higher liquid level if they choose.
- [\[217817\]](#) CONOCOPHILLIPS COMPANY will provide written notice to OCD, EMNRD OCD.Enviro@state.nm.us at least 72 hours, but no more than one week, prior to the recommencement of operations. Recommencement of recycling operations means that the operator plans to resume moving fluids through the containment and discharging fluids from the containment.
 - At the resumption of recycling operations, [\[217817\]](#) CONOCOPHILLIPS COMPANY is required to perform an incremental fluid level test for containment liquid levels above the minimum liquid level.
 - [\[217817\]](#) CONOCOPHILLIPS COMPANY will fill the containment. [\[217817\]](#) CONOCOPHILLIPS COMPANY will pause filling operations at every 10% of total fluid capacity above the minimum level.
 - [\[217817\]](#) CONOCOPHILLIPS COMPANY will maintain the liquid level for each 10% volume increase for 24 hours and inspect and operation the leak detection system at the end of the 24-hour period.
 - If there are no liquids present in the leak detection system, [\[217817\]](#) CONOCOPHILLIPS COMPANY may proceed to fill the next 10% volume and repeat the process until the containment full design capacity minus the 3-feet of freeboard is reached.
 - If liquids are present, [\[217817\]](#) CONOCOPHILLIPS COMPANY should immediately cease the incremental fill test and perform a liner inspection. [\[217817\]](#) CONOCOPHILLIPS COMPANY should provide written notice of the fluid detection and liner inspection findings to OCD via [OCD Online](#) using a C-147 (long form) with the "Other" box checked and "Notice of fluid detection" written as the explanation of "Other."
 - Upon notification of fluid detection in the leak detection system, the OCD will verify the source of water (condensation versus produced water).
 - If the detected fluid is confirmed to be condensation, the OCD will issue a written approval to proceed with the incremental fluid level test.

- If the detected fluid is confirmed to be produced water, [217817] CONOCOPHILLIPS COMPANY must comply with 19.15.34.13 NMAC. [217817] CONOCOPHILLIPS COMPANY must provide written notification to, EMNRD OCD.Enviro@state.nm.us on the actions taken to comply with 19.15.34.13 NMAC.
- After fluid is detected in the leak detection system, the incremental fill test cannot continue until after a written approval to proceed is issued by the OCD.
- [217817] CONOCOPHILLIPS COMPANY must submit copies of the detailed containment inspection records for the prior three months and a report detailing the incremental fluid level test process and results through the [OCD Online](#) system using a C-147 (long form) with the "Other" box checked. "Recommendation of Operations - Incremental Fluid Level Test" should be written as the explanation of "Other." Form C-147 must be completed and include information in sections 1 General Information, 2 Recycling Facility, 3 Recycling Containment, 4 Bonding, and 10 Operator Application Certification. Section 9 Recycling Facility and/or Containment Checklist may also need to be partially completed. Operators should verify that the resumption of operations notification does not result in any changes to the recycling containment operating and maintenance plan or the closure plan. If the recommencement of operations will affect the operating and maintenance plan or closure plan, operators should check those boxes in section 9 and provide updated plans or plan addendums as attachments to the C-147.
- [217817] CONOCOPHILLIPS COMPANY will continue to operate, maintain, and close 1RF-454 - Zia Hills Superman Recycling Facility and Containment Facility Number [fSL2029049637](#) in compliance with 19.15.34 NMAC, to include but not limited detailed inspection records, removal of trash/oil from containment, and monthly C-148 reporting (even if there is zero activity).
- Water reuse and recycling from 1RF-454 - Zia Hills Superman Recycling Facility and Containment , Facility Number [fSL2029049637](#) is limited to wells owned or operated by [217817] CONOCOPHILLIPS COMPANY.
- A minimum of 3-feet freeboard must always be maintained in the recycling containment during operations.
- [217817] CONOCOPHILLIPS COMPANY may request a variance for an additional extension to the determination of cessation of operations, which will be reviewed on a case-by-case basis and evaluated on their merit. Extensions are considered for a maximum length of six months. Additional requests must be submitted through [OCD Online](#) on a Form C-147 (long form) as an Extension request and should include a variance request and summary per 19.15.34.16 NMAC and the detailed inspection records for the prior three (3) months. The extension request should be submitted no later than November 30, 2021.

Please keep a copy of this electronic communication for your files, as no paper copy of the approval will be delivered. A copy of this electronic communication can be found in the facility file [fSL2029049637](#) on OCD Imaging at: <https://ocdimage.emnrd.state.nm.us/imaging/FacilityFileView.aspx?facility=fSL2029049637>

Please let me know if you any other questions or concerns.
Sincerely,

Victoria Venegas • Environmental Specialist
Environmental Bureau
EMNRD - Oil Conservation Division
811S. First St. | Artesia, NM 88210
(575) 909-0269 | Victoria.Venegas@state.nm.us
<http://www.emnrd.state.nm.us/OCD/>



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
Department
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-147
Revised April 3, 2017

Recycling Facility and/or Recycling Containment

Type of Facility: ☒ Recycling Facility ☒ Recycling Containment*
Type of action: ☐ Permit ☐ Registration
☐ Modification ☒ Extension
☐ Closure ☐ Other (explain) _____

* At the time C-147 is submitted to the division for a Recycling Containment, a copy shall be provided to the surface owner.

Be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.

Operator: ConocoPhillips Company OGRID #: 217817
Address: PO Box 2197 Houston TX 77252
Facility or well name (include API# if associated with a well): Zia Hills Recycling Facility and Containment
OCD Permit Number: 1RF-454 (For new facilities the permit number will be assigned by the district office)
U/L or Qtr/Qtr _____ Section 30 Township 26S Range 32E County: Lea
Surface Owner: ☒ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment

2.

☒ **Recycling Facility:**
Location of (if applicable): Latitude 32.014527° Longitude -103.714621 NAD83 (Approximate)
Proposed Use: ☒ Drilling* ☒ Completion* ☒ Production* ☒ Plugging *
**The re-use of produced water may NOT be used until fresh water zones are cased and cemented*
☐ Other, *requires permit for other uses. Describe use, process, testing, volume of produced water and ensure there will be no adverse impact on groundwater or surface water.*
☒ Fluid Storage
☐ Above ground tanks ☒ Recycling containment ☐ Activity permitted under 19.15.17 NMAC explain type _____
☐ Activity permitted under 19.15.36 NMAC explain type: _____ ☐ Other explain _____
☒ For multiple or additional recycling containments, attach design and location information of each containment
☐ **Closure Report (required within 60 days of closure completion):** ☐ Recycling Facility Closure Completion Date: _____

3.

☒ **Recycling Containment:** VOLUME 1 FOR IN-GROUND CONTAINMENTS; VOLUME 2 FOR AST CONTAINMENTS
☐ Annual Extension after initial 5 years (attach summary of monthly leak detection inspections for previous year)
Center of Recycling **Two In Ground Containments** (adjacent): (if applicable) Latitude 32.014614° Longitude -103.717637;
Three AST containments: Latitude 32.015321 Longitude -103.714592 NAD83 (Approximate)
☒ For multiple or additional recycling containments, attach design and location information of each containment: SEE DESIGN DRAWINGS
☒ Lined ☐ Liner type: Thickness **In Ground x2:** Primary 60- Mil HDPE; Secondary 60-Mil HDPE ☐ LLDPE ☒ HDPE ☐ PVC ☐ Other
AST x 2: Primary liner 40 mil LLDPE ; Secondary liner 40 mil LLDPE . SEE DESIGN DRAWINGS ☐ String-Reinforced
Liner Seams: ☒ Welded ☐ Factory ☐ Other _ Volume: SEE DESIGN DRAWINGS bbl Dimensions: (Inside dimensions) SEE DESIGN DRAWINGS AST #1 for produced water; 1 AST for future treated water
☐ Recycling Containment Closure Completion Date: _____

4.

Bonding:

- ☒ Covered under bonding pursuant to 19.15.8 NMAC per 19.15.34.15(A)(2) NMAC (These containments are limited to only the wells owned or operated by the owners of the containment.)
- ☐ Bonding in accordance with 19.15.34.15(A)(1). Amount of bond \$ _____ (work on these facilities cannot commence until bonding amounts are approved)
- ☐ Attach closure cost estimate and documentation on how the closure cost was calculated.

5.

Fencing:

- ☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet
- ☐ Alternate. Please specify _____

6.

Signs:

- ☐ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers
- ☐ Signed in compliance with 19.15.16.8 NMAC

7.

Variances:

Justifications and/or demonstrations that the proposed variance will afford reasonable protection against contamination of fresh water, human health, and the environment.

Check the below box only if a variance is requested:

- ☐ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval. If a Variance is requested, include the variance information on a separate page and attach it to the C-147 as part of the application.

If a Variance is requested, it must be approved prior to implementation.

8.

Siting Criteria for Recycling Containment

Instructions: The applicant must provide attachments that demonstrate compliance for each siting criteria below as part of the application. Potential examples of the siting attachment source material are provided below under each criteria.

General siting**Ground water is less than 50 feet below the bottom of the Recycling Containment.**

NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No
☐ NA

Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended.

☐ Yes ☐ No
☐ NA

- Written confirmation or verification from the municipality; written approval obtained from the municipality

Within the area overlying a subsurface mine.

- Written confirmation or verification or map from the NM EMNRD-Mining and Minerals Division

☐ Yes ☐ No

Within an unstable area.

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; topographic map

☐ Yes ☐ No

Within a 100-year floodplain. FEMA map

☐ Yes ☐ No

Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

☐ Yes ☐ No

- Topographic map; visual inspection (certification) of the proposed site

Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

☐ Yes ☐ No

- Visual inspection (certification) of the proposed site; aerial photo; satellite image

Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.

☐ Yes ☐ No

- NM Office of the State Engineer - iWATERS database search; visual inspection (certification) of the proposed site

Within 500 feet of a wetland.

☐ Yes ☐ No

- US Fish and Wildlife Wetland Identification map; topographic map; visual inspection (certification) of the proposed site

9.

Recycling Facility and/or Containment Checklist:**Instructions:** Each of the following items must be attached to the application. Indicate, by a check mark in the box, that the documents are attached.

- ☐ Design Plan - based upon the appropriate requirements.
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements.
- ☐ Closure Plan - based upon the appropriate requirements.
- ☐ Site Specific Groundwater Data -
- ☐ Siting Criteria Compliance Demonstrations -
- ☐ **Certify that notice of the C-147 (only) has been sent to the surface owner(s)**

10.

Operator Application Certification:

I hereby certify that the information and attachments submitted with this application are true, accurate and complete to the best of my knowledge and belief.

Name (Print): Jeremy Lee Title: Regulatory CoordinatorSignature: *Jeremy Lee* Date: 4/15/21e-mail address: Jeremy.L.Lee@cop.com Telephone: 832-486-2510

11.

OCD Representative Signature: *Victoria Venegas* Approval Date: 06/09/2021Title: Environmental Specialist OCD Permit Number: 1RF-454 Facility Number fSL2029049637☒ OCD Conditions ☒ Additional OCD Conditions on Attachment

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 31246

CONDITIONS

| | |
|--|---|
| Operator: CONOCOPHILLIPS COMPANY 600 W. Illinois Avenue Midland, TX 79701 | OGRID: 217817 |
| | Action Number: 31246 |
| | Action Type: [C-147] Water Recycle Long (C-147L) |

CONDITIONS

| | | |
|------------|-----------|----------------|
| Created By | Condition | Condition Date |
| vvenegas | None | 6/10/2021 |