



November 10, 2020

Bradford Billings
Hydrologist
District 2 Artesia
Oil Conservation Division
Santa Fe, NM 87505

**Re: Letter of Understanding
ConocoPhillips
Vacuum Abo Well #13-16 Flowline Release
1RP-2692
PLSS Unit Letter E, Section 4, Township 18 South, Range 35 East
Lea County, New Mexico**

Mr. Billings:

On behalf of ConocoPhillips, Tetra Tech, Inc. (Tetra Tech) is submitting this Letter of Understanding and closure request for review. The former ConocoPhillips (COP) Vacuum Abo Well #13-16 flowline release (Site) is located approximately 2.7 miles southeast of Buckeye, New Mexico in Lea County, New Mexico. The Site is located in the Public Land System Survey (PLSS) Unit Letter E, Section 4, Township 18 South, Range 35 East, at GPS coordinates 32.77983°, -103.46843°. The Site location is shown on Figure 1.

The initial C-141 for this release incident was first submitted by COP to the New Mexico Oil Conservation Division (NMOCD) on February 11, 2011 and was subsequently assigned the District Remediation Permit (RP) number 1RP-2692. For reasons unknown, an additional C-141 release notification (with identical incident details and information as 1RP-2692) was inadvertently submitted on September 28, 2011 and subsequently assigned the secondary District RP number 1RP-4160.

BACKGROUND

According to the NMOCD initial C-141 report (Attachment A), the release associated with 1RP-2692 occurred on February 9, 2011 when a 3-inch poly flowline parted due to extreme cold temperatures. The release was reported as consisting of approximately 16 barrels (bbls) of oil and 2 bbls of produced water and affected an approximately 80-ft by 50-ft by 2-inch-deep area of pasture. Vacuum trucks were used during initial response and approximately 56% of released fluids (9 bbls of oil and 1 bbl of produced water) were reported recovered on the C-141. The exact same incident described in 1RP-2692 was also described in the C-141 associated with 1RP-4160 (Attachment I within Attachment B).

REMEDATION PROPOSAL

A Remediation Proposal report dated March 11, 2011 was prepared by Environmental Plus, Inc. (EPI) for the 1RP-4160 incident on behalf of COP and submitted to NMOCD (Attachment B). According to this report, the efficiency of initial cleanup efforts and the underlying geology at the Site rendered analytical soil sampling unnecessary for assessment purposes. The proposed remediation activities involved excavating the entire release extent with a combination of track hoe, rock bucket, and hammer hoe. Confirmation samples would be taken from the sidewalls and excavation floor and sent to a commercial laboratory for analysis when field testing indicates clean boundaries. Following receipt of confirmation samples, the

TETRA TECH

8911 N. Capital of Texas Hwy, Building 2, Suite 2310, Austin, TX, 78759
Tel 512-338-1667 Fax 512-338-1331 www.tetrattech.com

Bradford Billings
NMOCD
November 10, 2020

excavation would be backfilled and seeded to aid in revegetation of the former release extent. The Remediation Proposal for 1RP-4160 was reported approved by NMOCD by EPI in later documentation.

REMEDIATION CLOSURE REPORT

A Remediation Closure Report was prepared by EPI on October 3, 2011 and submitted to NMOCD along with a final C-141 (Attachment C). Although this closure request was associated with the 1RP-4160 number, the documented remediation activities apply for both RP number 1RP-4160 as well as 1RP-2692 because the release notifications are duplicates of the same incident.

According to the EPI Remediation Closure Report, remediation efforts were initiated on March 30, 2011 after the March 2011 Remediation Proposal was approved by NMOCD. The report states that approximately 2,454 cubic yards of impacted material were excavated and transported to Controlled Recovery, Inc., (CRI) for disposal. Depth of excavation varied from 2-8 vertical feet with a surface area of 12,322 square feet. Soil samples were collected at selective locations from the sidewall/bottom of the excavation and transported to an independent laboratory for confirmatory analyses.

EPI remobilized to the release area on July 15, 2011 after receipt of analytical data. Approximately 154 cubic yards of additional impacted material were then excavated and transported to CRI. A soil sample was collected and immediately transported to Cardinal Laboratory in Hobbs, New Mexico. Upon receipt of acceptable confirmation sampling data, EPI commenced backfill operations. According to the approved documented remediation efforts, the entire impacted area was remediated to the following regulatory limits determined by EPI:

- Benzene: 10 mg/kg
- Benzene, Toluene, Ethylbenzene, and Xylenes (known collectively as BTEX): 50 mg/kg
- Total Petroleum Hydrocarbons (TPH): 100 mg/kg
- Chloride: 250 mg/kg

As indicated on the final C-141 included with the Remediation Closure Report, the closure request for this Site was approved by NMOCD in February 2016 under the 1RP-4160 number (Attachment C).

CONCLUSION

After review of historical documentation, as described above, both 1RP-2692 and 1RP-4160 are duplicates of the same release incident. The release footprint has been remediated and the closure request approved by NMOCD in February 2016 under 1RP-4160 (Attachment C). Therefore, ConocoPhillips respectfully requests that the NMOCD close 1RP-2692, as the incident described in 1RP-2692 is identical to 1RP-4160.

If you have any questions or comments concerning the assessment or the proposed remediation activities for this Site, please call Christian Llull at (512) 338-2861.

Sincerely,
Tetra Tech, Inc.



Christian M. Llull, P.G.
Project Manager

cc:
Mr. Charles Beauvais, GBPU – ConocoPhillips
Mr. Marvin Soriewei, RMR – ConocoPhillips

TETRA TECH

*Bradford Billings
NMOCD
November 10, 2020*

LIST OF ATTACHMENTS

Figure 1 – Site Location Map

Attachment A – Initial C-141

Attachment B – Remediation Proposal (EPI, March 2011)

Attachment C – Remediation Closure Report (EPI, October 2011)

TETRA TECH

FIGURE



DOCUMENT PATH: C:\USERS\AMY.WOODS\DESKTOP\TOPACO FIGURE SITES\FIGURE 1 SITE LOCATION - 1RP-2692.MXD

Legend

 Approximate Release Extent

Source: Google Earth Pro, November 2017.



0 50 100
Feet

 TETRA TECH www.tetrattech.com 901 West Wall Street, Suite 100 Midland, Texas 79701 Phone: (432) 682-4559 Fax: (432) 682-3946	CONOCOPHILLIPS 1RP-2692 (32.779839°, -103.468439°) LEA COUNTY, NEW MEXICO	PROJECT NO.: 212C-MD-02152 DATE: JUNE 16, 2020 DESIGNED BY: AJW
	VAC ABO WELL #13-16 FLOWLINE RELEASE SITE LOCATION MAP	Figure No. 1

ATTACHMENT A
Initial C-141

RECEIVED

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, 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

MAR 09 2011 Form C-141
Revised October 10, 2003
Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company ConocoPhillips Company	Contact John W. Gates
Address 3300 North A St. Bldg 6, Midland, TX 79705-5406	Telephone No. 505.391.3158
Facility Name VAC ABO Well # 13-16	Facility Type Oil and Gas
Surface Owner State Of New Mexico	Mineral Owner State Of New Mexico
Lease No 30-025-03072	

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
I	5	18 S	35E					Lea

Latitude Longitude

NATURE OF RELEASE

Type of Release Crude Oil And Produced Water	Volume of Release 18bbl (16oil, 2water)	Volume Recovered (9oil, 1water)
Source of Release 3 inch poly flow line parted due to extreme cold temperature	Date and Hour of Occurrence 2/9/11 1600	Date and Hour of Discovery 2/9/11 1630
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? NMOCD	
By Whom? John Gates	Date and Hour 2/11/11 0900	
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.*
~16 bbls of oil and ~2 bbls of produced water were released from a parted 3inch poly flow line due to extreme cold temperatures.

Describe Area Affected and Cleanup Action Taken.*
The affected area is an 80' X 50' X 2" area of pasture land. A vacuum truck was called to pick up standing fluids. ~9 bbls of oil and 1 bbl of produced water were recovered. A work order has been generated to repair the failed section of flow line

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>John W. Gates</i>	OIL CONSERVATION DIVISION	
Printed Name: John W. Gates	ENV. ENGINEER: Approved by District Supervisor: <i>[Signature]</i>	
Title: HSER Lead	Approval Date: 03/09/11	Expiration Date: 05/09/11
E-mail Address: John.W.Gates@conocophillips.com	Conditions of Approval: SUBMIT FINAL	Attached <input type="checkbox"/>
Date: 2/11/11 Phone: 505.391.3158	C-141 BY 05/09/11	IRP-03-11-2692

• Attach Additional Sheets If Necessary

Incident ID	
District RP	
Facility ID	
Application ID	

Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

Closure Report Attachment Checklist: *Each of the following items must be included in the closure report.*

- A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: _____ Title: _____

Signature: Charles R. Beauvais II Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: _____ Date: _____

Printed Name: _____ Title: _____

**ATTACHMENT B
Remediation Proposal
(EPI, March 2011)**



ENVIRONMENTAL PLUS, INC.
CONSULTING AND REMEDIAL CONSTRUCTION

ENVIRONMENTAL PLUS, INC.

11 March 2011

HOBBS OCD

JUL 11 2011

RECEIVED

Mr. Geoffrey Leking
Environmental Engineer
New Mexico Oil Conservation Division
1625 North French Drive
Hobbs, New Mexico 88240

RE: Remediation Proposal
ConocoPhillips Company – VAC ABO Well #13-16 Release Area
UL-D (NW1/4 of the NW1/4) of Section 04, T 18 S, R 35 E; Lea County, New Mexico
Longitude: 32° 46' 49.99"; Latitude: 103° 28' 11.64"
EPI Ref. #150030

Dear Mr. Leking:

On February 9, 2011 at 16:00 p.m. approximately 2-barrels (bbls) of produced water and 16-bbls of petroleum products were released from a ruptured 3" polyethylene surface flow line. Approximately 1-bbl of produced water and 9-bbls of petroleum product were recovered. The combined fluids covered a release area of ±12,300 square feet. After initial vacuuming of fluids, ConocoPhillips retained the services of Environmental Plus, Inc., (EPI) to GPS survey, photograph and assess product/water impacts of the release area. This letter report provides a Remediation Proposal.

Site Background

Although the release was from VAC ABO #13-16 surface production flowline, the release area is in the near vicinity (±150-feet southeast) of injection well VAC ABO #13-21. Hence, legal descriptions of release area will relate to that well. The release area is located in Section 04, T18S, R35E at an approximate elevation of 3,951 feet above mean sea level (amsl). The property is owned by the State of New Mexico and managed by the New Mexico State Land Office (NMSLO). A search for water wells was completed utilizing the New Mexico Office of the State Engineers website and a database maintained by the United States Geological Survey (USGS). No water wells (domestic, agriculture or public) or bodies of surface water exist within a 1,000 foot radius of the release area (reference Figure 2). Groundwater data indicates the average water depth is approximately 60 feet below ground surface (bgs). Based on available information, it was determined the vertical distance between impacted soil and groundwater is approximately 55 feet. Utilizing this information, New Mexico Oil Conservation Division Remedial Threshold Goals (NMOCD Goals) for this Site were determined as following:

2100 AVE O ~ PO BOX 1558 ~ EUNICE, NM 88231
PHONE (575) 394-3481 * (575) 394-2601 FAX

approved by:
Geoffrey Leking
Env. Engineer
NME MNRD - OCD
DIST 1 - HOBBS
07/11/11

4160



Parameter	NMOCD Goals
Benzene	10 mg/Kg
BTEX	50 mg/Kg
TPH	100 mg/Kg
Chlorides	250 mg/Kg

Field Work

On March 1, 2011 EPI visited the Release Area to conduct GPS survey and assess surface area damage. Having recently completed remediation activities in the Buckeye area [ConocoPhillips EVGSAU #29-13-006 Release Area located in UL-P (SE1/4 Of the SE1/4) of Section 29, T17S, R35E], EPI concluded delineation via trenching or soil borings was not required. Dense rock formations which commence approximately four (4) inches and extend over fifteen (15) feet below ground surface (bgs) limit vertical migration of production fluids. Based on related experience, impacted area should be limited to less than five (5) vertical feet. This concept is advanced by efficiency of cleanup efforts in vacuuming the release area leaving little amount of production fluids for sub-surface seepage..

Analytical Data

Owing to rapid response in surficial cleanup efforts, no soil samples were collected for field testing or laboratory analysis.

Site Remedial Proposal

EPI proposes remediating the release area in its entirety. Citing previous experience, the area will be excavated via use of a combination of track hoe with rock bucket and hammer hoe. The release area will be excavated to whatever depth and width is necessary for removal of impacted material. Impacted material will be transported to a state approved land farm for remediation or disposal dependent on major type of contaminant, i.e., TPH or chloride concentrations. Field tests will be conducted to assist in determining physical limits of contaminated area.

A portion of soil samples collected from sidewalls and bottom during excavation activities will be field analyzed for TPH and chloride concentrations. Soil samples collected for field testing of organic vapors will be placed in self sealing polyethylene bags and allowed to equilibrate to ~ 70° F. Soil samples will then be tested for organic vapors utilizing a MiniRae™ Photoionization Detector (PID) equipped with a 10.6 electron-volt (eV) lamp and calibrated for benzene response. Analysis for chloride concentrations will be conducted using a LaMotte Chloride Kit (titration method).

After field analysis for TPH and chloride concentrations have determined physical limits of contamination, soil samples will be collected for confirmatory laboratory analytical results. Soil samples designated for laboratory analysis are immediately inserted into laboratory provided containers, appropriately labeled, placed in coolers, iced down and transported to an independent laboratory for quantification of BTEX (benzene, toluene, ethylbenzene and total xylenes), TPH [Gasoline Range Organics (GRO) and Diesel Range Organics (DRO)] and chloride concentrations.



Upon receipt of laboratory analytical results confirming BTEX, TPH and chloride concentrations are below NMOCD Goals, backfilling activities will commence.

Excavated areas will be backfilled with top soil free of deleterious material, rocks and large clods. This material will be transported from a local pit in the Buckeye area to the job site. Backfill will be slightly mounded in the middle sloping peripherally to meet original ground surface. Disturbed areas will be contoured to blend with natural ground and prevent wind/water erosion. The entire disturbed area will be deep drill seeded with a blend approved by the NMSLO. However, EPI recommends seeding operations be completed late spring 2011 when weather and ground conditions are more conducive to vegetative growth.

Should you have technical questions, concerns or need for additional information, please contact me at (575) 394-3481 (office), (575) 441-7802 (cellular) or via e-mail at dduncanepi@gmail.com. Official communications should be directed to Mr. John Gates at (575) 391-3158 (office), (575) 390-4821 (cellular) or via e-mail at John.W.Gates@conocophillips.com with correspondence addressed to:

Mr. John W. Gates
HSER Lead
Permian-Buckeye Operations
29 Vacuum Complex Lane
Lovington, New Mexico 88260-9664

Sincerely,

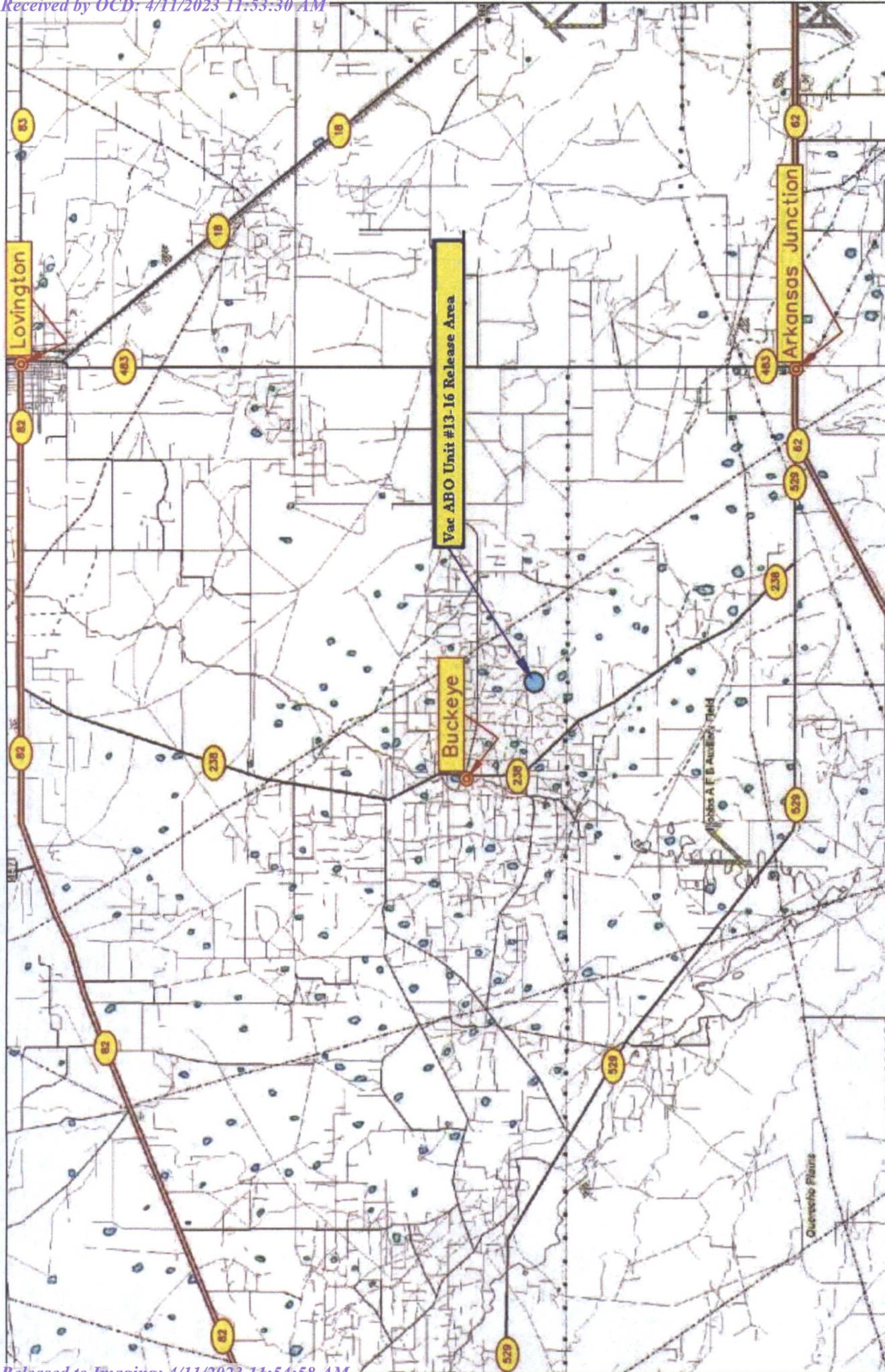
ENVIRONMENTAL PLUS, INC.,

David P. Duncan
Civil Engineer
EPI Project Manager

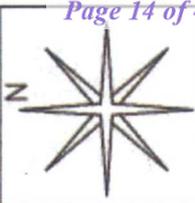
Cc: Mr. John W. Gates, HSER Lead – ConocoPhillips
Ms. Myra Harrison, Land Manager – NMSLO
Roger Boone, Operations Manager - EPI

Encl: Figure 1 - Area Map
Figure 2 – Site Location Map
Figure 3 – Release Area Map
Table 1 – Well Data
Attachment I – Copy of Initial NMOCD Form C-141

FIGURES

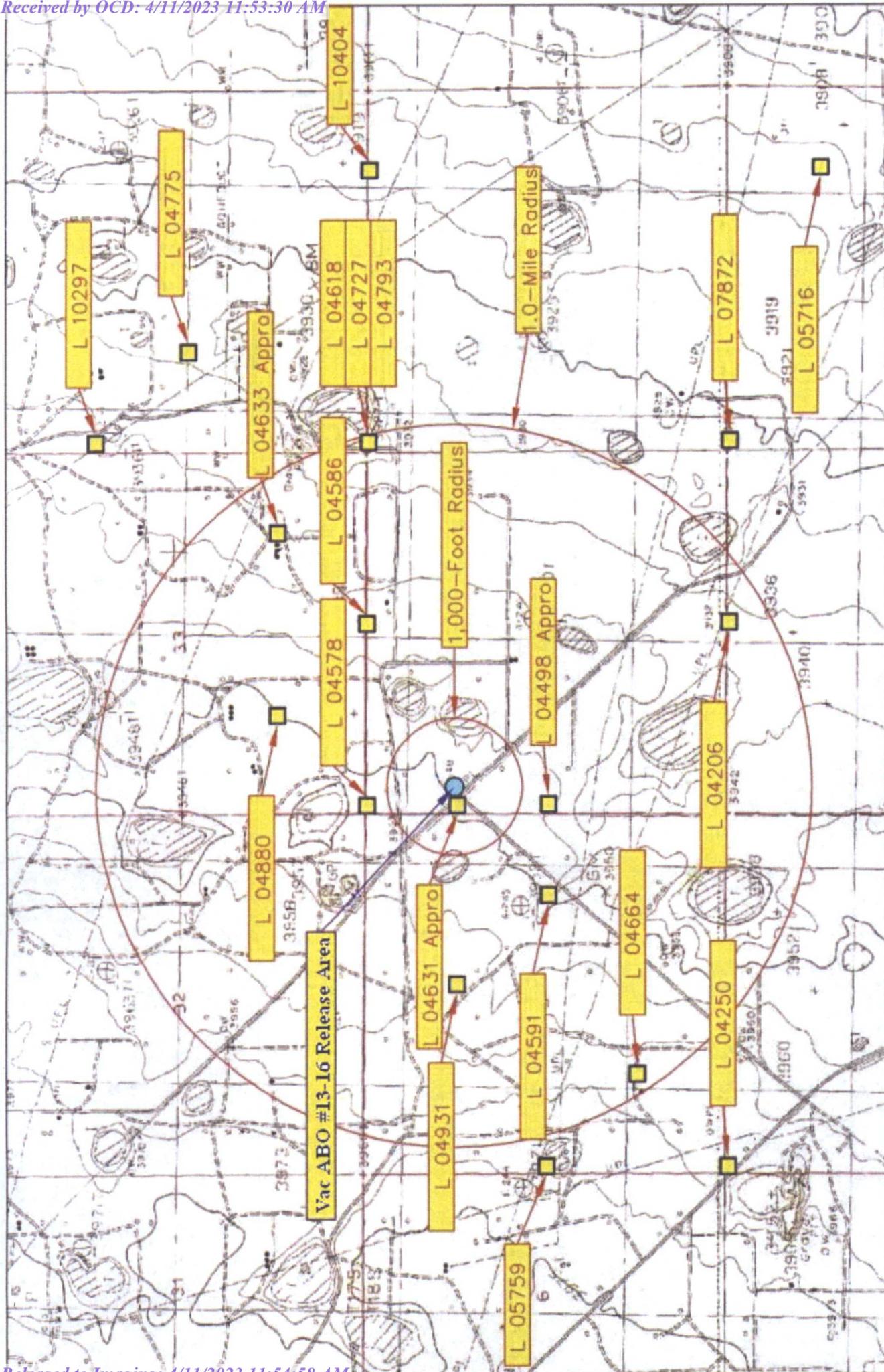


DWG By: Daniel Dominguez
 Revised: March 2006



Lea County, New Mexico
 NW 1/4 of the NW 1/4, Sec. 4, T18S, R35E
 N 32° 46' 49.99" W 103° 28' 11.64"
 Elevation: 3,948 feet amsl

Figure 1
 Area Map
 ConocoPhillips
 Vacuum ABO Unit #16-13 Release Area



DWG By: Daniel Dominguez
 March 2006

Lea County, New Mexico
 NW 1/4 of the NW 1/4, Sec. 4, T18S, R35E
 N 32° 46' 49.99" W 103° 28' 11.64"
 Elevation: 3,948 feet amsl

Figure 2
 Site Location Map
 ConocoPhillips
 Vacuum ABO Unit #13-16 Release Area

REVISED:
 4000 SHEET
 1 of 1

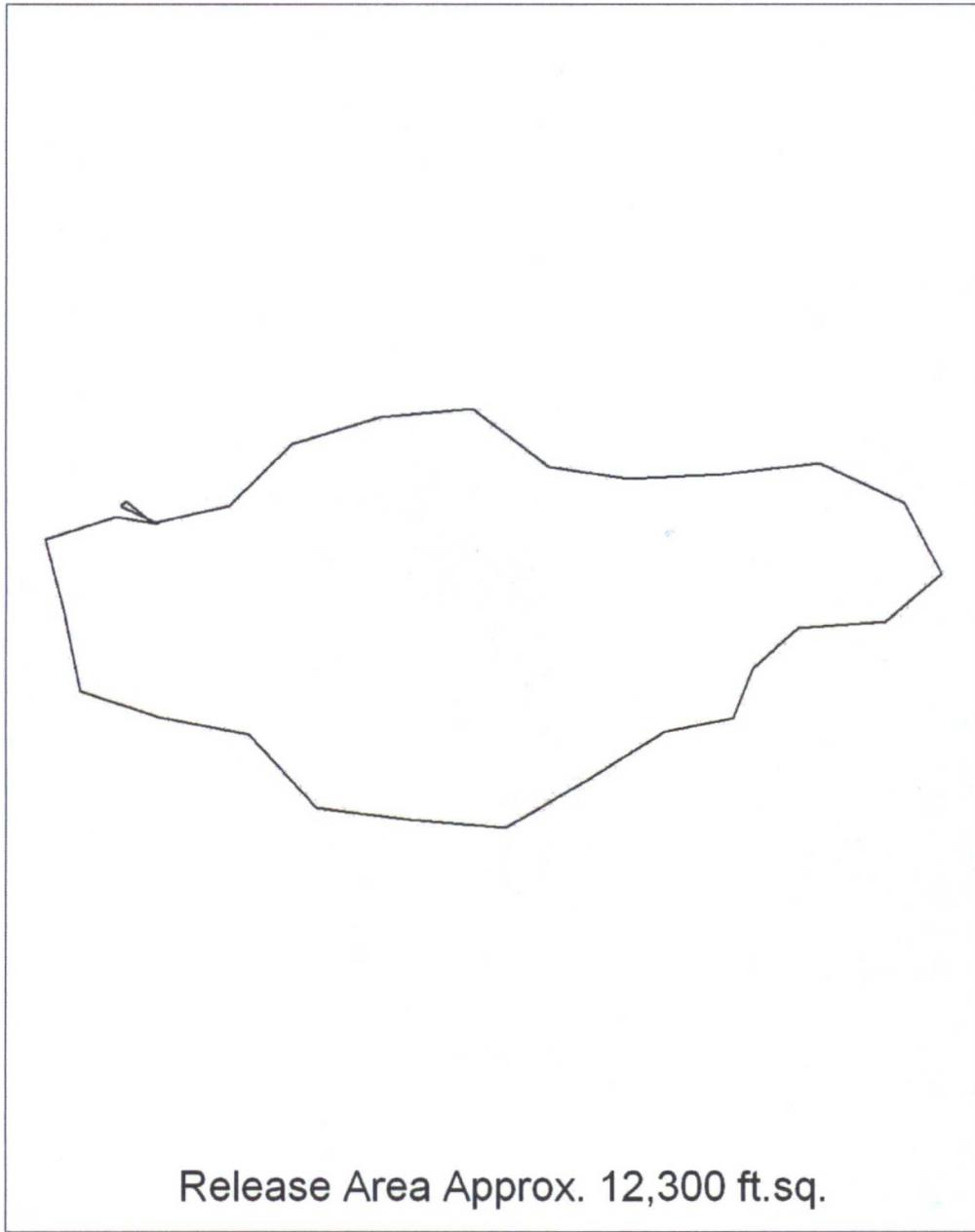
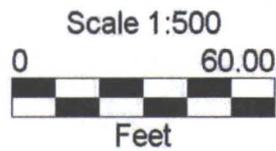


Figure 3

Lat/Long
WGS 1984



VAC ABO #13-16 Release.ssf
3/4/2011



TABLES

TABLE 1
Well Data
ConocoPhillips - Vacuum ABO Unit Well #13-16 Release Area (Ref. # 150030)

Well Number	Diversion ^A	Owner	Use	Twp	Rng	Sec	q	q	q	Latitude	Longitude	Date Measured	Surface Elevation ^B	Depth to Water	
														(ft)	(ft bgs)
L 04206	3	JOHNN DRILLING CO.	PRO	18S	35E	04	43			N32° 46' 10.14"	W103° 27' 43.55"	09-Jul-59	3,940	50	
L 04498 APPRO	0	LOFFLAND BROTHERS COMPANY	PRO	18S	35E	04	13			N32° 46' 36.37"	W103° 28' 14.63"	09-Aug-60	3,950	70	
L 04631 APPRO	0	A. W. THOMPSON INC.	PRO	18S	35E	04	112			N32° 46' 49.43"	W103° 28' 14.69"	17-Apr-61	3,951	60	
L 07872	0	ENERGY RESERVES GROUP INC.	PRO	18S	35E	03	331			N32° 46' 10.01"	W103° 27' 12.59"	07-Apr-78	3,930	62	
L 04250	3	CACTUS DRILLING CORP. OF TEXAS	PRO	18S	35E	05	5			N32° 46' 10.38"	W103° 29' 16.56"	27-Aug-59	3,966	60	
L 04591	3	SHARP DRILLING COMPANY	PRO	18S	35E	05	24			N32° 46' 36.43"	W103° 28' 30.11"	01-Feb-61	3,954	75	
L 04664	3	HONDO DRILLING COMPANY	PRO	18S	35E	05	32			N32° 46' 23.45"	W103° 29' 1.06"	16-Jun-61	3,967	70	
L 04931	0	MOBIL OIL CORPORATION	SRO	18S	35E	05	21			N32° 46' 49.55"	W103° 28' 45.61"	07-Mar-81	3,963	70	
L 05759	0	PHILLIPS PET. CO.	PRO	18S	35E	05	13			N32° 46' 36.60"	W103° 29' 16.56"		3,970		
L 05716	0	MORAN OIL PRODUCING & DRILLING	PRO	18S	35E	10	22			N32° 45' 56.80"	W103° 26' 25.73"	09-Aug-65	3,915	49	
L 04578	3	SHOENFELD-HUNTER-KITCH DRLG.CO	PRO	17S	35E	33				N32° 47' 2.45"	W103° 28' 14.75"	12-Jan-61	3,957	60	
L 04586	3	HONDO DRILLING	PRO	17S	35E	33	433			N32° 47' 2.29"	W103° 27' 43.86"	18-Jan-61	3,947	50	
L 04633 APPRO	0	HONDO DRILLING COMPANY	PRO	17S	35E	33	42			N32° 47' 15.34"	W103° 27' 28.42"	20-Apr-61	3,940	65	
L 04880	0	HONDO DRILLING CO.	PRO	17S	35E	33	32			N32° 47' 15.52"	W103° 27' 59.30"	18-Apr-62	3,950	90	
L 04618	3	A. W. THOMPSON INC.	PRO	17S	35E	34	33			N32° 47' 2.13"	W103° 27' 12.97"	31-Mar-61	3,931	55	
L 04727	3	NOBLE DRILLING CORPORATION	PRO	17S	35E	34				N32° 47' 2.13"	W103° 27' 12.97"	05-Oct-61	3,931	45	
L 04775	3	DALE MOUNT DRILLING COMPANY	PRO	17S	35E	34	14			N32° 47' 28.34"	W103° 26' 57.43"	11-Dec-61	3,934	33	
L 04793	3	PHILLIPS PETROLUM CO.	PRO	17S	35E	34				N32° 47' 2.13"	W103° 27' 12.97"	30-Jan-62	3,931	50	
L 10297	3	LASCO CONSTRUCTION	SAN	17S	35E	34	113			N32° 47' 41.50"	W103° 27' 12.94"	20-Feb-92	3,940	42	
L 10404	3	LEE CATTLE COMPANY LTD.	STK	17S	35E	34	442			N32° 47' 2.05"	W103° 26' 26.35"	24-Jul-94	3,924	115	
L 10304	0	YATES PETROLEUM	PRO	18S	35E	09	441			N32° 45' 17.63"	W103° 27' 27.68"	01-Feb-93	3,931	72	

^B = Elevation interpolated from USGS topographical map based on referenced location.
 PRO = 72-12-1 Prospecting or development of natural resource
 SRO = Secondary recovery of oil
 SAN = 72-12-1 Sanitary in conjunction with commercial use
 STK = 72-12-1 Livestock watering
 quarters are 1 =NW, 2=NE, 3=SW, 4=SE; quarters are biggest to smallest
Shaded area indicates wells not shown in Figure 2

ATTACHMENTS

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
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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 October 10, 2003

Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company ConocoPhillips Company	Contact John W. Gates
Address 3300 North A St. Bldg 6, Midland, TX 79705-5406	Telephone No. 505.391.3158
Facility Name VAC ABO Well # 13-16	Facility Type Oil and Gas
Surface Owner State Of New Mexico	Mineral Owner State Of New Mexico
Lease No 30-025-03072	

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
I	5	18 S	35E					Lea

Latitude Longitude

NATURE OF RELEASE

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Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? NMOCD	
By Whom? John Gates	Date and Hour 2/11/11 0900	
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.*

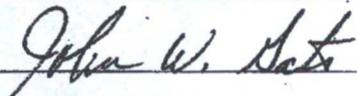
~16 bbls of oil and ~2 bbls of produced water were released from a parted 3inch poly flow line due to extreme cold temperatures.

Describe Area Affected and Cleanup Action Taken.*

The affected area is an 80' X 50' X 2" area of pasture land. A vacuum truck was called to pick up standing fluids. ~9 bbls of oil and 1 bbl of produced water were recovered. A work order has been generated to repair the failed section of flow line

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: 	Approved by District Supervisor:	
Printed Name: John W. Gates	Approval Date:	Expiration Date:
Title: HSER Lead	Conditions of Approval:	
E-mail Address: John.W.Gates@conocophillips.com	Attached <input type="checkbox"/>	
Date: 2/11/11 Phone: 505.391.3158		

• Attach Additional Sheets If Necessary

**ATTACHMENT C
Remediation Closure Report
(EPI, October 2011)**



AE Order Number Banner

Report Description

This report shows an AE Order Number in Barcode format for purposes of scanning. The Barcode format is Code 39.



App Number: pKJ1603938439

1RP - 4160

CONOCOPHILLIPS COMPANY

2/8/2016

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, 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 October 10, 2003

Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company: ConocoPhillips Company		Contact: John W. Gates	
Address: 3300 North "A" St., Bldg. 6, Midland, Tx. 79705-5406		Telephone No.: (575) 391-3158	
Facility Name: VAC ABO Well #13-16 Release		Facility Type: Oil and Gas	
Surface Owner: State of New Mexico		Mineral Owner: State of New Mexico	API No.: 30-025-03072

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
I	5	18S	35E					Lea

Latitude: N32° 46' 49.99"

Longitude: W103° 28' 11.64"

NATURE OF RELEASE

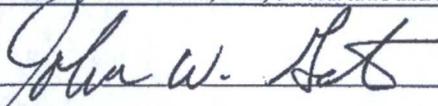
Type of Release: Crude Oil and Produced Water	Volume of Release: 18 bbls (16-oil; 2- water)	Volume Recovered: 10 bbls (9-oil; 1-water)
Source of Release: 3-Inch Polyethylene flow line parted due to extreme cold weather	Date and Hour of Occurrence: 2/9/11 @ 16:00 p.m.	Date and Hour of Discovery: 2/9/11 @ 16:30 p.m.
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? NMOCD	
By Whom? John W. Gates	Date and Hour: 2/11/11 @ 0900	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse: Not Applicable	
If a Watercourse was Impacted, Describe Fully.* Not Applicable		

Depth to Groundwater: ~ 60- feet below ground surface (bgs)

Describe Cause of Problem and Remedial Action Taken.* Release originated from parting of a 3-inch Poly Flow Line due to extremely cold temperature; approximately 18-bbls of production fluid was released covering a surface area of ±12,300 square feet; vacuum truck picked up 10-bbls of fluid; release area was GPS surveyed and photographed; Remediation Proposal was presented to and approved by NMOCD

Describe Area Affected and Cleanup Action Taken.* On 3-29-11 Environmental Plus, Inc., (EPI) mobilized labor and equipment to the release area; from 3-30-11 to 4-29-11 ±2,454 cubic yards of impacted material were excavated and transported to CRI for disposal; from 4-30-11 to 6-14-11 no remedial activities were undertaken; EPI re-mobilized to the site on 6-15-11, excavated and transported ±154 cubic yards of impacted material to CRI for disposal; with laboratory analytical results confirming excavation was void of impacted material, backfill operations commenced; from 6-20-11 to 8-04-11 ±2,604 cubic yards of clean top soil were used as backfill material; surface area was contoured to blend with natural topography and prevent wind/water erosion; due to drought conditions, it is recommended discing and deep seeding of disturbed areas with mixture approved by the NMSLO be postponed until weather and ground conditions are more conducive to vegetative growth

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: 

Printed Name: John W. Gates

Title: HSER Lead

E-mail Address: John.W. Gates@conocophillips.com

Date: 9-28-11 **Phone:** (575) 391- 3158 (office)

OIL CONSERVATION DIVISION

APPROVED

2/10/16

ATTACHED

IRP 4160

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, 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 October 10, 2003

Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company ConocoPhillips Company	Contact John W. Gates
Address 3300 North A St. Bldg 6, Midland, TX 79705-5406	Telephone No.: 505.391.3158
Facility Name VAC ABO Well # 13-16	Facility Type Oil and Gas
Surface Owner State Of New Mexico	Mineral Owner State Of New Mexico
Lease No 30-025-03072	

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
I	5	18 S	35E					Lea

Latitude Longitude

NATURE OF RELEASE

Type of Release Crude Oil And Produced Water	Volume of Release 18bbl (16oil, 2water)	Volume Recovered (9oil, 1water)
Source of Release 3 inch poly flow line parted due to extreme cold temperature	Date and Hour of Occurrence 2/9/11 1600	Date and Hour of Discovery 2/9/11 1630
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? NMOCD	
By Whom? John Gates	Date and Hour 2/11/11 0900	
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.*

~16 bbls of oil and ~2 bbls of produced water were released from a parted 3inch poly flow line due to extreme cold temperatures.

Describe Area Affected and Cleanup Action Taken.*

The affected area is an 80' X 50' X 2" area of pasture land. A vacuum truck was called to pick up standing fluids. ~9 bbls of oil and 1 bbl of produced water were recovered. A work order has been generated to repair the failed section of flow line

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:

John W. Gates

Printed Name: **John W. Gates**

Approved by District Supervisor:

Title: **HSE Lead**

Approval Date:

Expiration Date:

E-mail Address: **John.W.Gates@conocophillips.com**

Conditions of Approval:

Attached

Date: **2/11/11**

Phone: **505.391.3158**

- Attach Additional Sheets If Necessary

HOBBS OCD

LETTER OF TRANSMITTAL

OCT 07 2011

RECEIVED

ENVIRONMENTAL PLUS, INC.



Date: 3 October 2011
 To: **Mr. Geoffrey Leking**
 Company Name: New Mexico Oil Conservation Division
 Address: 1625 North French Drive
 City / State / Zip: Hobbs, New Mexico 88240
 From: David P. Duncan
 CC: John W. Gates, ConocoPhillips – Lead HSE Permian-Buckeye Operations
 Myra Harrison, Land Manager, NMSLO – Hobbs, NM
 Steven Ikeda, Environmental Specialist, NMSLO – Santa Fe, NM
 Project #: EPI Ref. #150030
 Project Name: VAC ABO Well #13-16 Release Area
 Subject: **Remediation Closure Report**

# of originals	# of copies	Description
1		ConocoPhillips Company – VAC ABO Well #13-16 Release Area <i>Remediation Closure Report</i>

Remarks

Dear Mr. Leking:

Enclosed is a bound copy of the *Remediation Closure Report* for the above referenced project.

Should you have any technical questions, concerns or need additional information, please contact me at (575) 394-3481 or via email at dduncanepi@gmail.com. Official communications/correspondence should be directed to Mr. John W. Gates, ConocoPhillips Company, at (575) 391-3158 (office), (575) 390-4821 (cellular) or via e-mail at John.W.Gates@conocophillips.com

Sincerely,

David P. Duncan
Civil Engineer

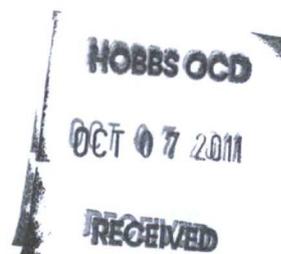
P. O. Box 1558
Eunice, NM 88240
(505) 394-3481
Fax: (505) 394-2601



ENVIRONMENTAL PLUS, INC.
CONSULTING AND REMEDIAL CONSTRUCTION

3 October 2011

Mr. Geoffrey Leking
Environmental Engineer
New Mexico Oil Conservation Division
1625 North French Drive
Hobbs, New Mexico 88240



RE: Remediation Closure Report
ConocoPhillips Company – VAC ABO Well #13-16 Release Area
UL-D (NW1/4 of the NW1/4) of Section 04, T 18 S, R 35 E; Lea County, New Mexico
Latitude: 32° 46' 49.99"; Longitude: 103° 28' 11.64"
EPI Ref. #150030

Dear Mr. Leking:

On February 9, 2011 at 16:00 p.m. approximately 2-barrels (bbls) of produced water and 16-bbls of petroleum products were released from a ruptured 3" polyethylene surface flow line. Approximately 1-bbl of produced water and 9-bbls of petroleum product were recovered. The combined fluids covered an initial release area of $\pm 12,300$ square feet. After vacuuming of fluids, ConocoPhillips retained the services of Environmental Plus, Inc., (EPI) to GPS survey, photograph, assess product/water impacts of the release area, develop and implement a *Remediation Proposal* for the New Mexico Oil Conservation Division (NMOCD). For clarity and cross references elimination purposes, this *Remediation Closure Report* includes *Site Background, Preliminary Field Work, Analytical Data* and *Field Remediation Activities*.

Site Background

Although the release was from VAC ABO #13-16 surface production flowline, the release area is in the near vicinity (± 150 -feet southeast) of injection well VAC ABO #13-21. Hence, legal descriptions of release area will relate to that well. The release area is located in Section 04, T18S, R35E at an approximate elevation of 3,951 feet above mean sea level (amsl). The property is owned by the State of New Mexico and managed by the New Mexico State Land Office (NMSLO). A search for water wells was completed utilizing the New Mexico Office of the State Engineers website and a database maintained by the United States Geological Survey (USGS). No water wells (domestic, agriculture or public) or bodies of surface water exist within a 1,000 feet radius of the release area (reference Figure 2). Groundwater data indicates the average water depth is approximately 60 feet below ground surface (bgs). Based on available information, it was determined the vertical distance between impacted soil and groundwater is approximately 55 feet. Utilizing this information, NMOCD Remedial Threshold Goals (NMOCD Goals) for this Site were determined as follows:

2100 AVE O ~ PO BOX 1558 ~ EUNICE, NM 88231

PHONE (575) 394-3481 * (575) 394-2601 FAX

ENVIRONMENTAL PLUS, INC.



Parameter	NMOCD Goals
Benzene	10 mg/Kg
BTEX	50 mg/Kg
TPH	100 mg/Kg
Chlorides	250 mg/Kg

Preliminary Field Work

On March 1, 2011 EPI visited the release area to conduct GPS survey and assess surface area damage. Having recently completed remediation activities in the Buckeye area [ConocoPhillips EVGSAU #29-13-006 Release Area located in UL-P (SE1/4 of the SE1/4) of Section 29, T17S, R35E], EPI concluded delineation via sample trenches or soil borings was not required. Dense rock formations which commence approximately four (4) inches and extend over fifteen (15) feet below ground surface (bgs) limit vertical migration of production fluids. Based on related experience, impacted area should be limited to less than five (5) vertical feet. This concept was advanced via efficiency of cleanup efforts in vacuuming the release area leaving little volume of production fluids for sub-surface seepage..

Analytical Data

Owing to rapid response in surficial cleanup efforts, surface soil samples were not collected for field testing or laboratory analysis. However, soil samples were collected during excavation activities to delineate both vertical and lateral extents of impacted material. As can be derived from *Table #3*, TPH concentrations were the constituent-of concern with chloride concentrations being a lesser impact. Soil samples were collected from bottom and sidewalls of the excavation at selected intervals for representation of actual field conditions (Note *Figure 4*).

Portions of soil samples were field analyzed primarily for organic vapors and chloride concentrations. Soil samples collected for testing of organic vapors were placed in a self-sealing polyethylene bag and allowed to equilibrate to ~70°F. Soil Samples were then tested for organic vapor concentrations utilizing a MiniRae™Photoionization Dectector (PID) equipped with a 10.6 electron-volt (eV) lamp calibrated for benzene response. Chloride concentrations were analyzed in the field using a LaMotte Chloride Kit (Titration Method).

Soil samples designated for laboratory analyses were immediately inserted into laboratory provided glass containers, placed into ice filled coolers and transported to an independent laboratory for quantification of TPH and chloride concentrations to a lesser extent. As determined by field testing, soil samples displaying low chloride concentrations were precluded for laboratory analyses.

Field Remediation Activities

After approval of the *Remediation Proposal* by the NMOCD and effective date of the “One-Call”, EPI arrived at the release area on March 29, 2011 with a line locator spotting both surface and sub-surface pipelines as a precautionary measure. Equipment was mobilized to the release area on March 30, 2011 and excavation activities commenced. Impacted material was stockpiled on a plastic sheet to prevent additional contamination of the area. Via intermittent use of a trackhoe utilizing a



combination rock bucket and hammer hoe attachment, approximately 2,454 cubic yards of impacted material were excavated and transported to Controlled Recovery, Inc., (CRI) for remediation or disposal. Depth of excavation varied from 2-8 vertical feet with a surface area of 12,322 square feet.

As noted in *Table #3*, soil samples were collected at selective locations from the sidewall/bottom of the excavation and field analyzed for TPH and chloride concentrations as guidelines to depth and lateral extent of impacted soil. Soil samples indicating compliance with NMOCD Goals were collected/packaged as noted in *Analytical Data* above and transported to an independent laboratory for confirmatory analyses.

From April 29, 2011 to July 14, 2011 no remediation activities were undertaken at the release area. With laboratory analytical data indicating all soil samples save for an area around SW-4 (Ref. *Figure #4*) were in compliance with NMOCD Goals, EPI mobilized to the release area on July 15, 2011. The area around SW-4 was excavated laterally and vertically until field tests indicated TPH concentrations in conformance with NMOCD Goals. Approximately 154 cubic yards of impacted material were excavated and transported to CRI. Soil sample was collected via previous discussed methods (*Analytical Data*) and immediately transported to Cardinal Laboratory, Hobbs, New Mexico for quantification of TPH concentrations. Upon receipt of laboratory data confirming TPH concentrations were in conformance with NMOCD Goals, EPI commenced backfill operations.

From April 20, 2011 through August 4, 2011, approximately 2,604 cubic yards of clean top soil were transported from the Pearce Trust Pit located approximately two (2) miles west of the release area. Top soil was free of deleterious material, rocks and large earthen clumps. The resultant surface area was sloped to promote natural drainage and prevention of wind/water erosion.

Remaining remedial activities are discing disturbed areas and deep seeding planting a grass mixture approved by the NMSLO. However, EPI recommends delaying this activity until disturbed areas receive substantial moisture. Should this event not happen until late fall or early winter, the disturbed areas should be disced and a cover crop (winter wheat) deep seeded. Discing of disturbed areas and deep seeding NMSLO seed mixture can be accomplished in spring 2012 when ground and weather conditions are more conducive to vegetative growth.

Should you have technical questions, concerns or need for additional information, please contact me at (575) 394-3481 (office), (575) 441-7802 (cellular) or via e-mail at dduncanepi@gmail.com.

Official communications should be directed to Mr. John Gates at (575) 391-3158 (office), (575) 390-4821 (cellular) or via e-mail at John.W.Gates@conocophillips.com with correspondence addressed to:

Mr. John W. Gates
Lead HSE – Permian-Buckeye Operations
29 Vacuum Complex Lane
Lovington, New Mexico 88260-9664



Sincerely,

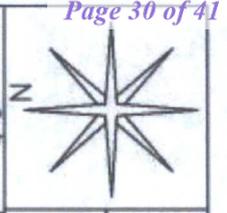
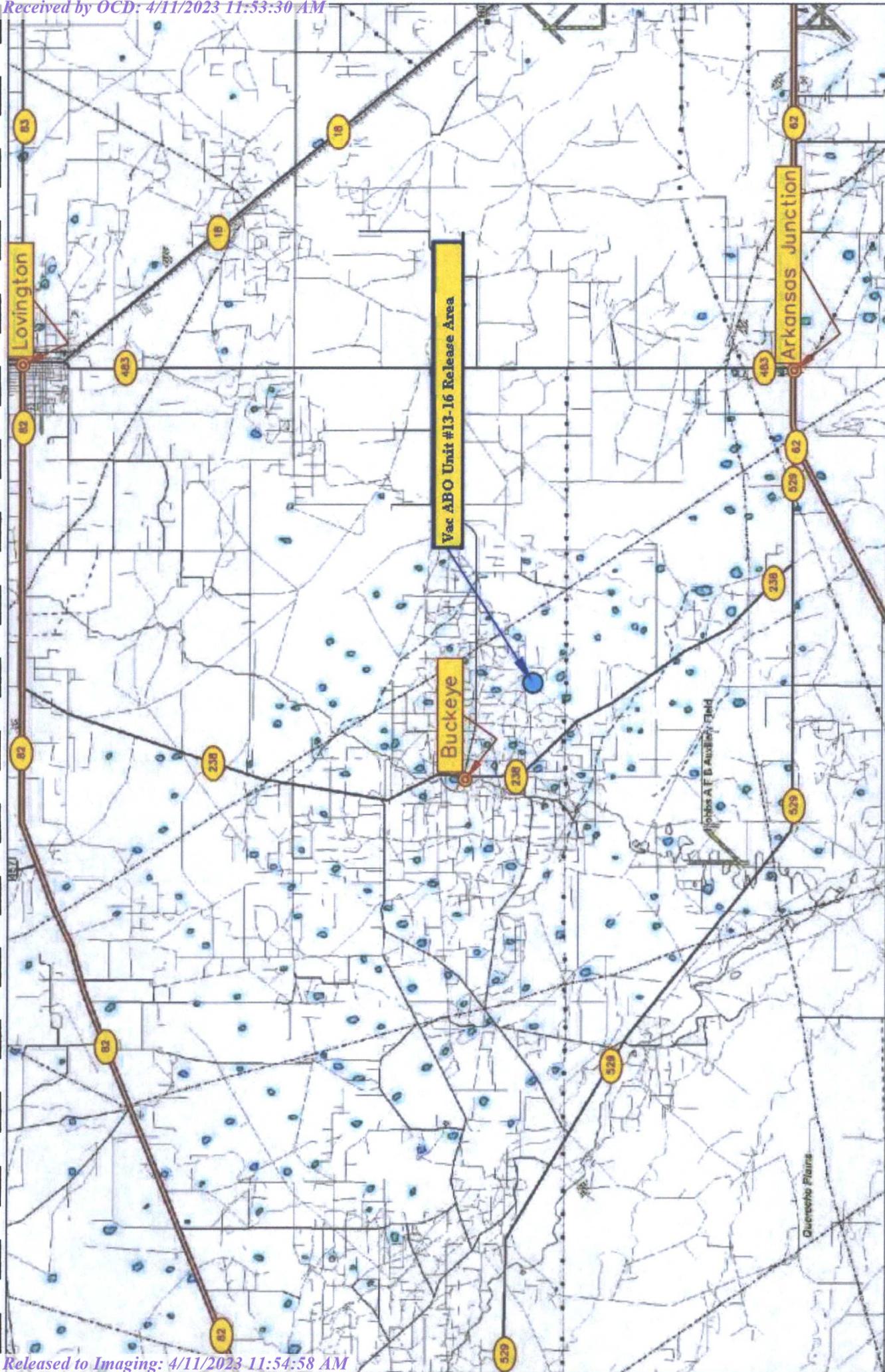
ENVIRONMENTAL PLUS, INC.,

A handwritten signature in black ink, appearing to read "David P. Duncan", written over the company name.

David P. Duncan
Civil Engineer
EPI Project Manager

Cc: Mr. John W. Gates, Lead HSE - Permian-Buckeye Operations – ConocoPhillips
Mr. Steve Ikeda, Environmental Specialist - NMSLO
Ms. Myra Harrison, Land Manager – NMSLO
Roger Boone, Operations Manager – EPI

Encl: Figure 1 - Area Map
Figure 2 – Site Location Map
Figure 3 – Initial Release Area Map
Figure 4 – Final Release Area Map with Sample Points
Table 1 – Well Data
Table 3 – Summary of Excavation Field Analyses and Laboratory Analytical Results
Attachment I - Photographs
Attachment II – Copy of Initial NMOCD Form C-141
Final NMOCD Form C-141



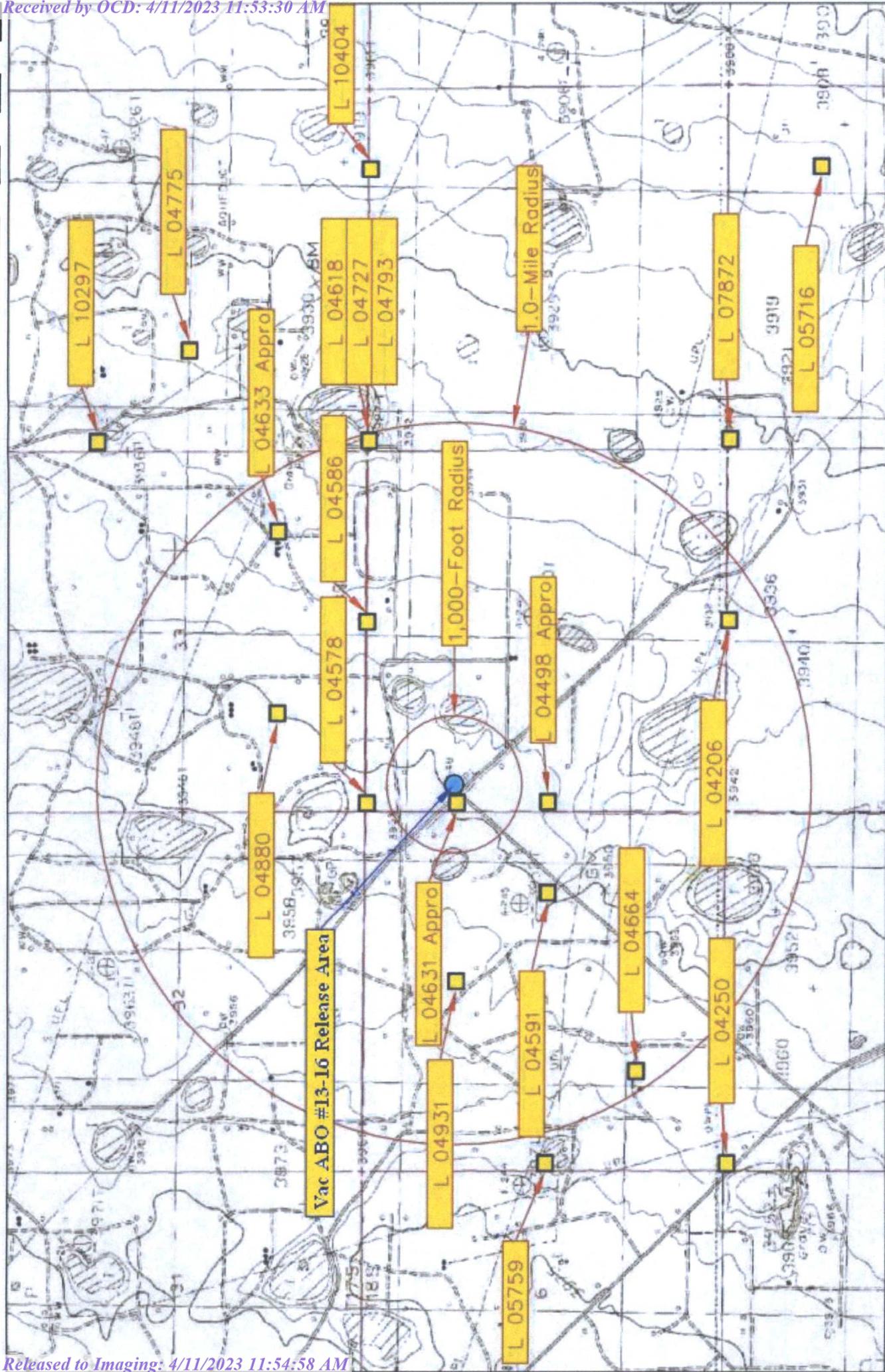
DWG By: Daniel Dominguez
 March 2006

REVISED:

0 3 6 SHEET
 Miles 1 of 1

Lea County, New Mexico
 NW 1/4 of the NW 1/4, Sec. 4, T18S, R35E
 N 32° 46' 49.99" W 103° 28' 11.64"
 Elevation: 3,948 feet amsl

Figure 1
 Area Map
 ConocoPhillips
 Vacuum ABO Unit #16-13 Release Area



REVISED:
 DWG By: Daniel Dominguez
 March 2006
 0 2000 4000 SHEET
 1 of 1
 Feet

Lea County, New Mexico
 NW 1/4 of the NW 1/4, Sec. 4, T18S, R35E
 N 32° 46' 49.99" W 103° 28' 11.64"
 Elevation: 3,948 feet amsl

Figure 2
 Site Location Map
 ConocoPhillips
 Vacuum ABO Unit #13-16 Release Area

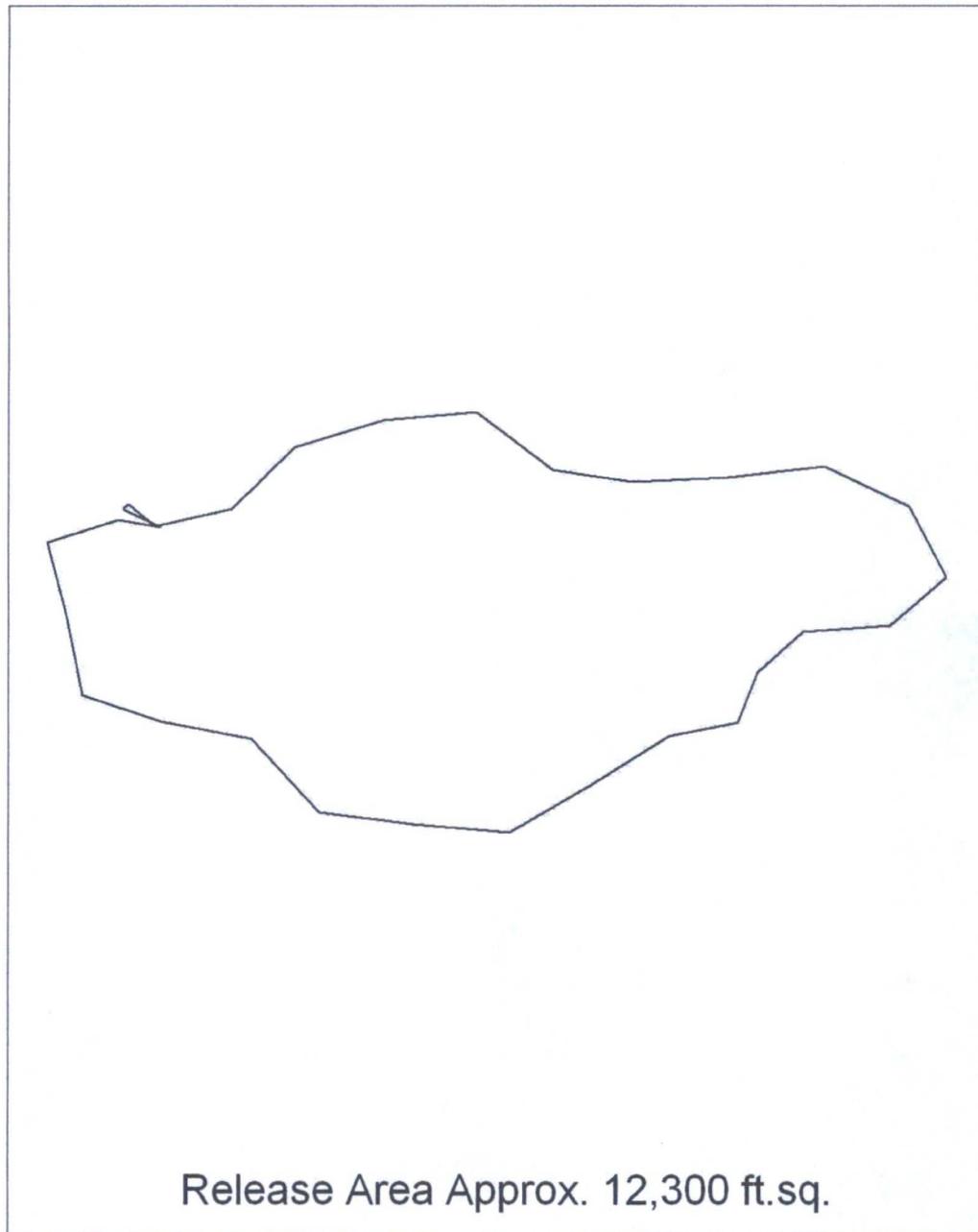
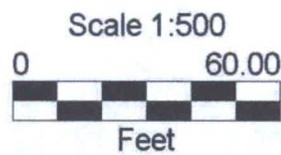


Figure 3

Lat/Long
WGS 1984

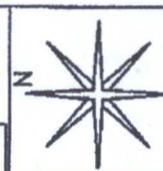
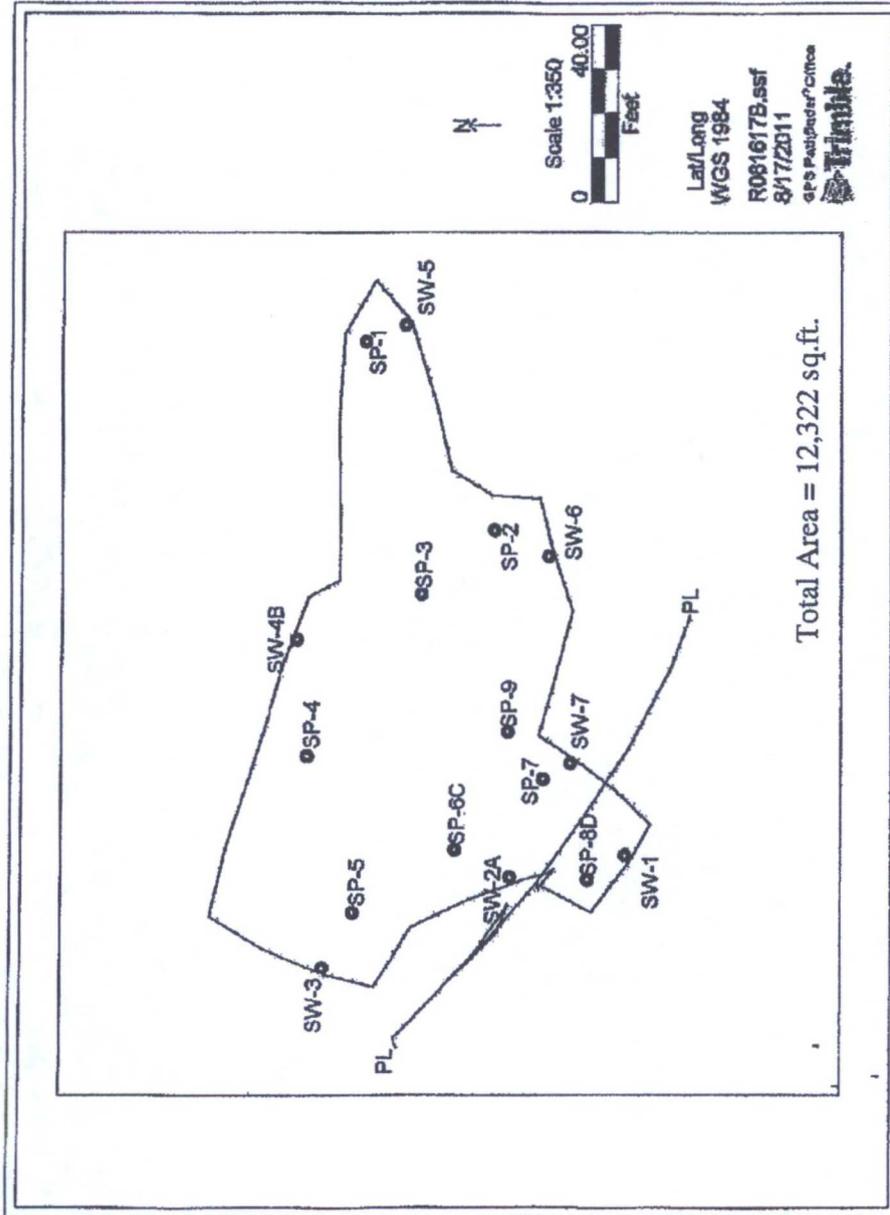


VAC ABO #13-16 Release.ssf

3/4/2011

GPS Pathfinder® Office





REVISID:
 DWG By: Jerry Smith
 September 2011

Leo County, New Mexico
 NE 1/4 of the NE 1/4, Sec. 5, T18S, R35E
 N 32.779906" W103.468107"
 Elevation: 3,946 feet amsl

Figure 4
 Sample Location Map
 ConocoPhillips
 VAC ABO #13-16

SHEET
 1 of 1

TABLE 1
Well Data
ConocoPhillips - Vacuum ABO Unit Well #13-16 Release Area (Ref. # 150030)

Well Number	Diversion ^A	Owner	Use	Twsp	Rng	Sec q q q	Latitude	Longitude	Date Measured	Surface Elevation ^B	Depth to Water (ft bgs)
L 04206	3	JOHN DRILLING CO.	PRO	18S	35E	04 4 3	N32° 46' 10.14"	W103° 27' 43.55"	09-Jul-59	3,940	50
L 04498 APPRO	0	LOFFLAND BROTHERS COMPANY	PRO	18S	35E	04 1 3	N32° 46' 36.37"	W103° 28' 14.63"	09-Aug-60	3,950	70
L 04631 APPRO	0	A. W. THOMPSON INC.	PRO	18S	35E	04 1 1 2	N32° 46' 49.43"	W103° 28' 14.69"	17-Apr-61	3,951	60
L 07872	0	ENERGY RESERVES GROUP INC.	PRO	18S	35E	03 3 3 1	N32° 46' 10.01"	W103° 27' 12.59"	07-Apr-78	3,930	62
L 04250	3	CACTUS DRILLING CORP. OF TEXAS	PRO	18S	35E	5	N32° 46' 10.38"	W103° 29' 16.56"	27-Aug-59	3,966	60
L 04591	3	SHARP DRILLING COMPANY	PRO	18S	35E	05 2 4	N32° 46' 36.43"	W103° 28' 30.11"	01-Feb-61	3,954	75
L 04664	3	HONDO DRILLING COMPANY	PRO	18S	35E	05 3 2	N32° 46' 23.45"	W103° 29' 1.06"	16-Jun-61	3,967	70
L 04931	0	MOBIL OIL CORPORATION	SRO	18S	35E	05 2 1	N32° 46' 49.55"	W103° 28' 45.61"	07-Mar-81	3,963	70
L 05759	0	PHILLIPS PET. CO.	PRO	18S	35E	05 1 3	N32° 46' 36.60"	W103° 29' 16.56"		3,970	
L 05716	0	MORAN OIL PRODUCING & DRILLING	PRO	18S	35E	10 2 2	N32° 45' 56.80"	W103° 26' 25.73"	09-Aug-65	3,915	49
L 04578	3	SHOENFELD-HUNTER-KITCH DRLG.CO	PRO	17S	35E	33	N32° 47' 2.45"	W103° 28' 14.75"	12-Jan-61	3,957	60
L 04586	3	HONDO DRILLING	PRO	17S	35E	33 4 3 3	N32° 47' 2.29"	W103° 27' 43.86"	18-Jan-61	3,947	50
L 04633 APPRO	0	HONDO DRILLING COMPANY	PRO	17S	35E	33 4 2	N32° 47' 15.34"	W103° 27' 28.42"	20-Apr-61	3,940	65
L 04880	0	HONDO DRILLING CO.	PRO	17S	35E	33 3 2	N32° 47' 15.52"	W103° 27' 59.30"	18-Apr-62	3,950	90
L 04618	3	A. W. THOMPSON INC.	PRO	17S	35E	34 3 3	N32° 47' 2.13"	W103° 27' 12.97"	31-Mar-61	3,931	55
L 04727	3	NOBLE DRILLING CORPORATION	PRO	17S	35E	34	N32° 47' 2.13"	W103° 27' 12.97"	05-Oct-61	3,931	45
L 04775	3	DALE MOUNT DRILLING COMPANY	PRO	17S	35E	34 1 4	N32° 47' 28.34"	W103° 26' 57.43"	11-Dec-61	3,934	33
L 04793	3	PHILLIPS PETROLUM CO.	PRO	17S	35E	34	N32° 47' 2.13"	W103° 27' 12.97"	30-Jan-62	3,931	50
L 10297	3	LASCO CONSTRUCTION	SAN	17S	35E	34 1 1 3	N32° 47' 41.50"	W103° 27' 12.94"	20-Feb-92	3,940	42
L 10404	3	LEE CATTLE COMPANY LTD.	STK	17S	35E	34 4 4 2	N32° 47' 2.05"	W103° 26' 26.35"	24-Jul-94	3,924	115
L 10304	0	YATES PETROLEUM	PRO	18S	35E	09 4 4 1	N32° 45' 17.63"	W103° 27' 27.68"	01-Feb-93	3,931	72

^B = Elevation interpolated from USGS topographical map based on referenced location.
 PRO = 72-12-1 Prospecting or development of natural resource
 SRO = Secondary recovery of oil
 SAN = 72-12-1 Sanitary in conjunction with commercial use
 STK = 72-12-1 Livestock watering
 quarters are 1=NW, 2=NE, 3=SW, 4=SE; quarters are biggest to smallest
Shaded area indicates wells not shown in Figure 2

TABLE 3
Summary of Excavation Soil Sample Field Analyses and Laboratory Analytical Results

ConocoPhillips Company

Vacuum ABO #13-16 Release Area (UL-D, Section 04, T18S, R35E, Lea County, New Mexico)

NMOCD #: EPI Ref. #150030

Sample I.D.	Depth (feet)	Soil Status	Sample Date	PID Field Analysis (ppm)	Field Chloride Analyses (mg/Kg)	Benzene (mg/Kg)	Toluene (mg/Kg)	Ethylbenzene (mg/Kg)	Total Xylenes (mg/Kg)	Total BTEX (mg/Kg)	TPH (C6-C12) (mg/Kg)	TPH (C12-C28) (mg/Kg)	TPH (C28-C35) (mg/Kg)	Total TPH (C6-C35) (mg/Kg)	Chloride (mg/Kg)
SP-1	1.5	In Situ	14-Apr-11	11.2	240	--	--	--	--	--	ND	74.2	ND	74.2	61.8
SP-2	1	Excavated	14-Apr-11	14.9	--	--	--	--	--	--	33.7	52.5	16.8	576	--
SP-2A	3	In Situ	27-Apr-11	20.5	--	--	--	--	--	--	ND	ND	ND	ND	--
SP-3	4	In Situ	14-Apr-11	12.4	--	--	--	--	--	--	ND	ND	ND	ND	--
SP-4	3	In Situ	14-Apr-11	24.7	--	--	--	--	--	--	ND	ND	ND	ND	--
SP-5	3	In Situ	14-Apr-11	7.6	--	--	--	--	--	--	ND	20.4	ND	20.4	--
SP-6	5	Excavated	14-Apr-11	1,548	--	--	--	--	--	--	--	--	--	--	--
SP-6C	7	In Situ	27-Apr-11	34.3	--	--	--	--	--	--	ND	ND	ND	ND	--
SP-7	2	Excavated	14-Apr-11	9.1	--	--	--	--	--	--	ND	177	ND	177	--
SP-7A	3	In Situ	27-Apr-11	6.3	--	--	--	--	--	--	ND	ND	ND	ND	--
SP-8	4	Excavated	14-Apr-11	2,262	200	--	--	--	--	--	--	--	--	--	--
SP-8D	8	In Situ	27-Apr-11	38.5	--	--	--	--	--	--	ND	ND	ND	ND	207
SP-9	6	In Situ	27-Apr-11	35.2	--	--	--	--	--	--	ND	46.6	ND	46.6	--
SW-1	5	In Situ	27-Apr-11	47.5	--	--	--	--	--	--	ND	ND	ND	ND	--
SW-2	5	In Situ	27-Apr-11	44.3	--	--	--	--	--	--	ND	ND	ND	ND	--
SW-3	1	In Situ	27-Apr-11	41.4	--	--	--	--	--	--	ND	ND	ND	ND	--

TABLE 3
 Summary of Excavation Soil Sample Field Analyses and Laboratory Analytical Results

ConocoPhillips Company

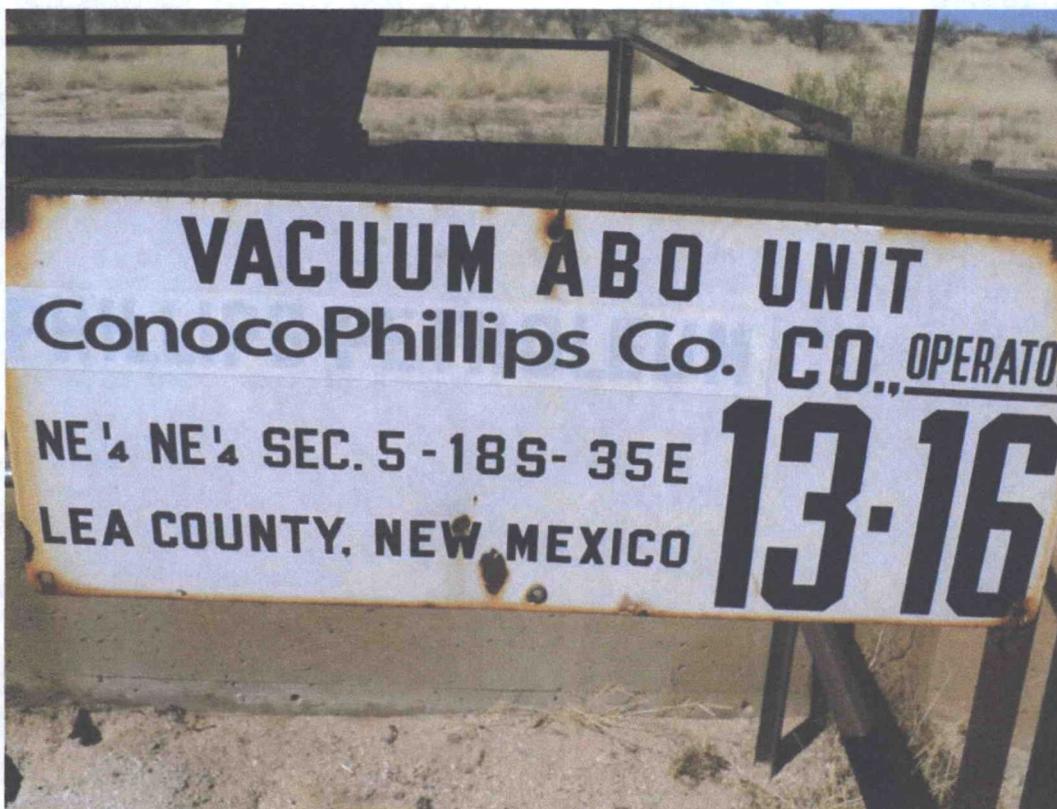
Vacuum ABO #13-16 Release Area (UL-D, Section 04, T18S, R35E, Lea County, New Mexico)

NMOCD #: EPI Ref. #150030

Sample I.D.	Depth (feet)	Soil Status	Sample Date	PID Field Analysis (ppm)	Field Chloride Analyses (mg/Kg)	Benzene (mg/Kg)	Toluene (mg/Kg)	Ethylbenzene (mg/Kg)	Total Xylenes (mg/Kg)	Total BTEX (mg/Kg)	TPH (C6-C12) (mg/Kg)	TPH (C12-C28) (mg/Kg)	TPH (C28-C35) (mg/Kg)	Total TPH (C6-C35) (mg/Kg)	Chloride (mg/Kg)
SW-4	1.5	Excavated	27-Apr-11	42.1	--	--	--	--	--	--	55.7	1,340	20.7	1,416	--
SW-4A	2	Excavated	18-Jul-11	42.8	--	--	--	--	--	--	--	--	--	--	--
SW-4B	2	In Situ	18-Jul-11	4.2	--	--	--	--	--	--	<10.0	<10.0	--	<20.0	--
SW-5	1	In Situ	27-Apr-11	12.6	--	--	--	--	--	--	ND	26.0	ND	26.0	--
SW-6	1.5	In Situ	27-Apr-11	36.8	--	--	--	--	--	--	ND	ND	ND	ND	--
SW-7	1.5	In Situ	27-Apr-11	4.7	--	--	--	--	--	--	ND	ND	ND	ND	--
SW-8	5	In Situ	27-Apr-11	29.2	--	--	--	--	--	--	ND	53.9	ND	53.9	--
SW-9	5	In Situ	27-Apr-11	38.4	--	--	--	--	--	--	ND	41.3	ND	41.3	--
NMOCD Remedial Threshold Goals															
				100		10				50				100	250

Bold values are in excess of NMOCD Remediation Threshold Goals

Nomenclature: BH = Bottom Hole; SW- Sidewall (N = North, S = South, E = East and W = West)
 J = Detected, but below Reporting Limits. Therefore, result is an estimated concentration (CLP J-Flag)
 -- = Not Analyzed; ND - Not Detected; SB- Soil Boring; BG - Background Soil Boring



Photograph No. – Lease Sign



Photograph No. 2 – Looking easterly at Release Area



Photograph No. # 3 – Trackhoes with Rock Bucket (left) and Hammerhoe attachment (right)



Photograph No. 4 – Looking southeast at excavation bottom and sidewalls



Photograph No. 5 – Looking southerly at excavation and ingress/egress ramp



Photograph No. 6 – Looking northerly at excavation, steel pipeline with pipe support and ingress/egress ramp



Photograph No. 6 – Looking southwesterly at partially backfilled excavation



Photograph No. 8 – Looking easterly at completed backfilled excavation and steel flowline

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

CONDITIONS

Action 206307

CONDITIONS

Operator: Maverick Permian LLC 1111 Bagby Street Suite 1600 Houston, TX 77002	OGRID: 331199
	Action Number: 206307
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

Created By	Condition	Condition Date
jharimon	None	4/11/2023