



September 17, 2020

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

**Subject: Closure Letter Report
ConocoPhillips
1RP-2295
EVGSAU Satellite #1 Release
Unit Letter J, Section 19, Township 17 South, Range 35 East
Lea County, New Mexico**

Mr. Billings:

On behalf of ConocoPhillips Company (ConocoPhillips), Tetra Tech, Inc. (Tetra Tech) submits the following Closure Report for review. The ConocoPhillips EVGSAU Satellite #1 facility (Site) is located approximately 1.25 miles north-northeast of Buckeye, New Mexico. The facility coordinates are 32.818315°, -103.493641° in Unit Letter J, Section 19, Township 17 South, Range 35 East, Lea County, New Mexico (Figure 1). The unrelated adjacent EVGSAU #1910-001 well is listed in the C-141. The well site coordinates are 32.81884°, -103.4960709°.

BACKGROUND

According to the State of New Mexico C-141 Initial Report (Attachment A), on September 8, 2009, a release originated from a hole in a 4" elbow on a steel bypass line due to internal/external corrosion. Approximately 3 bbls of oil and 7.6 bbls of produced water were released and approximately 3 bbls and 7 bbls of produced water were recovered. The affected area was a 40' X 30' X 0.5" area of dry, hard caliche pad with no livestock present. An employee discovered the release and immediately closed the dump valve located behind the bypass line, which effectively stopped the release. He then notified the Lease Operator who in turn notified supervision. A vacuum truck was called and recovered 3 barrels (bbls) of crude oil and 7 bbls of produced water. Notice was given to the New Mexico Oil Conservation Division (NMOCD) later that same day, and the release was subsequently assigned the Remediation Permit (RP) number 1RP-2295.

SITE CHARACTERIZATION

A site characterization was performed and no watercourses, lakebeds, sinkholes, playa lakes, residences, schools, hospitals, institutions, churches, springs, public or private domestic water wells, springs, wetlands, incorporated municipal boundaries, subsurface mines, or floodplains are located within the specified distances. The Site is located in a low karst potential area.

Based on data from the New Mexico Office of the State Engineer (NMOSE), there are three water wells located in Section 19, Township 17 South, and Range 35 East. Average depth to water is 77 feet. The site characterization data is shown in Attachment B.

A risk-based evaluation was performed for the Site in accordance with the NMOCD to determine recommended remedial action levels (RRALs) for benzene, toluene, ethylbenzene, and xylene (collectively referred to as BTEX), total petroleum hydrocarbons (TPH), and chlorides in soil.

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
September 17, 2020

Based on the site characterization, the RRALs for the Site are as follows:

Constituent	RRAL
Chloride	10,000 mg/kg
TPH (GRO+DRO+MRO)	2,500 mg/kg
TPH (GRO+DRO)	1,000 mg/kg
BTEX	50 mg/kg
Benzene	10 mg/kg

REMEDATION ACTIVITIES

According to the C-141 Initial Report, the release was to be remediated in accordance with an agreement with NMOCD. However, from historical documentation it is unclear on when the remediation activities occurred at the Site.

VISUAL SITE INSPECTION

At the request of ConocoPhillips, Tetra Tech personnel conducted a visual Site Inspection in July 2020 at the apparent release area at the Satellite #1 facility to evaluate current conditions at the Site. Photographic documentation from the visual inspection is included in Attachment C.

A list of field observations describing the Site follow:

- No surficial staining was noted at the apparent point of release or the in the assumed release extent at the facility.

CONCLUSION

Based on the age of the release, the near full recovery, the reported affected area being entirely on the caliche pad, and a recent visual inspection performed at the Site, ConocoPhillips requests closure for this release. The final C-141 form is enclosed in Attachment A.

Should you have any questions or comments regarding this report, please do not hesitate to contact me by telephone at 512-338-2861 or by email at christian.llull@tetrattech.com.

Sincerely,



Christian M. Llull
Project Manager
Tetra Tech, Inc.

FIGURES



DOCUMENT PATH: D:\CONOCOPHILLIPS\MXD\FIGURE 1 SITE LOCATION_1RP-2295.MXD



TETRA TECH

www.tetrattech.com

901 West Wall Street, Suite 100
Midland, Texas 79701
Phone: (432) 682-4559
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CONOCOPHILLIPS

1RP-2295
(32.818315°, -103.493641°)
LEA COUNTY, NEW MEXICO

**EVGSAU SATELLITE # 1 LINE RELEASE
SITE LOCATION MAP**

PROJECT NO.: 212C-MD-02152

DATE: AUGUST 04, 2020

DESIGNED BY: AAM

Figure No.

1

**ATTACHMENT A
C-141 Forms**

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

RECEIVED

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

SEP 15 2009

HOBBSOC

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 EVGSAU Satellite # 1 closest well EVGSAU 1910-001	Facility Type Oil and Gas

Surface Owner State Of New Mexico	Mineral Owner State Of New Mexico	Lease No 30-025-02824-00-00
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LOCATION OF RELEASE

Unit Letter J	Section 19	Township 17S	Range 35E	Feet from the	North/South Line	Feet from the	East/West Line	County Lea
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Latitude

Longitude

NATURE OF RELEASE

Type of Release Crude Oil & Produced Water	Volume of Release 10.6bbl (3oil, 7.6water)	Volume Recovered (3oil, 7water)
Source of Release The release originated from a hole in a 4" elbow on a steel bypass line due to internal/external corrosion.	Date and Hour of Occurrence 09/8/09 1715	Date and Hour of Discovery 09/8/09 1730
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
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.*

WATER @ 73'

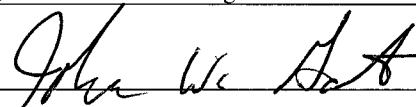
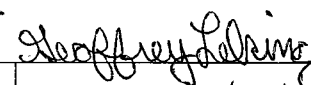
Describe Cause of Problem and Remedial Action Taken.*

The release originated from a hole in a 4" elbow on a steel bypass line due to internal/external corrosion. A PAC Employee discovered the release and immediately closed the dump valve located behind the bypass line which effectively stopped the release. He then notified the COPC Lease Operator who in turn notified supervision. A vacuum truck was called and recovered 3bbls of crude oil and 7 bbls of produced water.

Describe Area Affected and Cleanup Action Taken.*

The affected area is a 40' X 30' X .5" area of dry hard caliche pad with no livestock present. The spill site will be remediated in accordance with an agreement with NMOCD.

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: 	OIL CONSERVATION DIVISION	
Printed Name: John W. Gates	Approved by ENV ENGINEER District Supervisor: 	
Title: HSER Lead	Approval Date: 09/16/09	Expiration Date: 11/16/09
E-mail Address: John.W.Gates@conocophillips.com	Conditions of Approval: DELIVERATE TO CLEAN +1. SUBMIT FINAL C-141 BY 11/16/09	Attached <input type="checkbox"/>

FGRLO928154673

IRP-09.10.2295

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
NMOSE Site Characterization Data



New Mexico Office of the State Engineer

Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

(R=POD has been replaced, O=orphaned, C=the file is closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest) (NAD83 UTM in meters)

(In feet)

POD Number	POD Sub-Code	basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	Depth Well	Depth Water	Water Column
L 04829 POD7	L	LE		3	3	3	19	17S	35E	640012	3631688*	210	70	140
L 05439	L	LE		2	3	3	19	17S	35E	640212	3631888*	135	85	50
L 05850	L	LE		2	2	2	19	17S	35E	641377	3633109*	230		

Average Depth to Water: **77 feet**

Minimum Depth: **70 feet**

Maximum Depth: **85 feet**

Record Count: 3

PLSS Search:

Section(s): 19

Township: 17S

Range: 35E

*UTM location was derived from PLSS - see Help

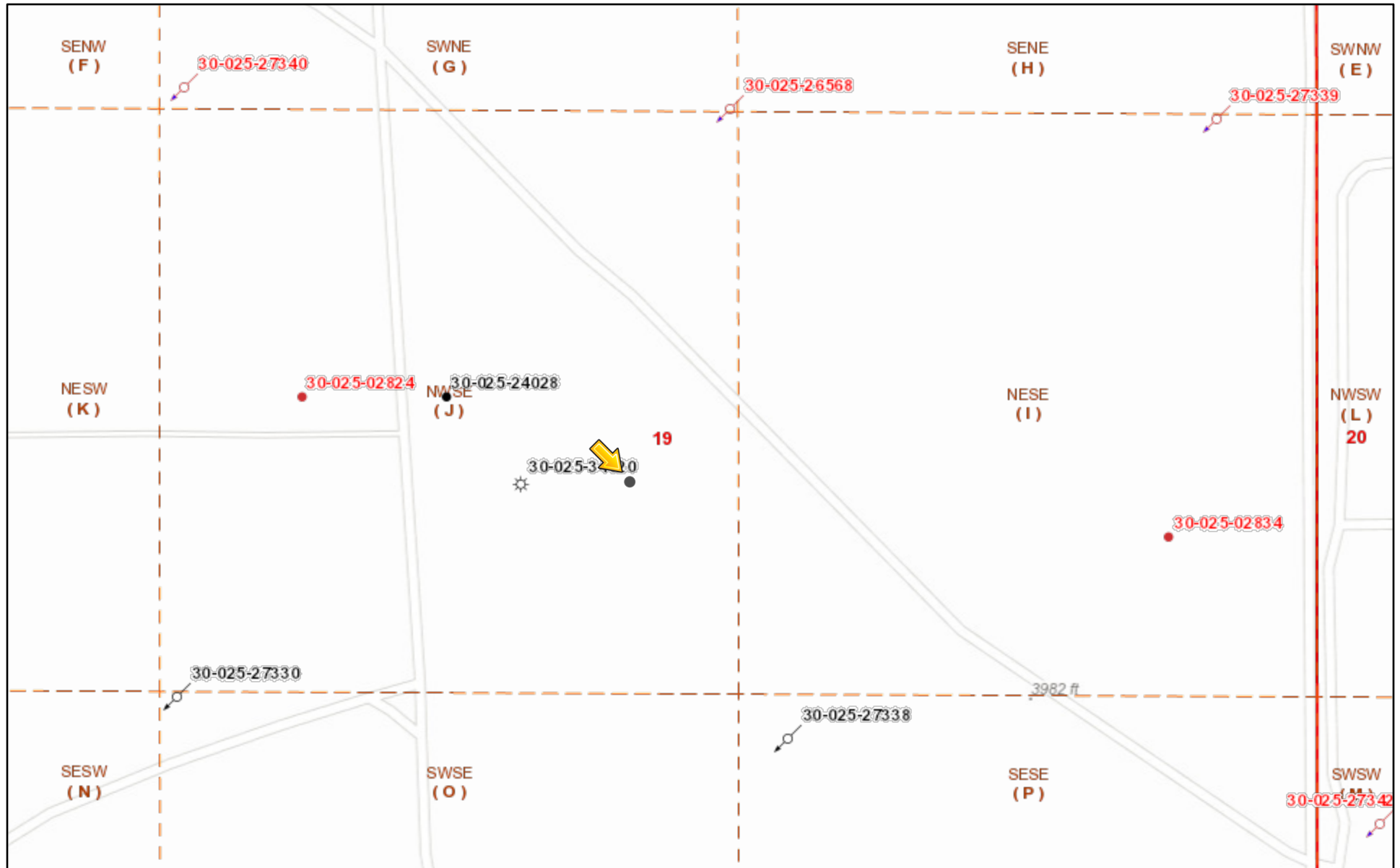
The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

7/17/19 8:19 AM

Page 1 of 1

WATER COLUMN/ AVERAGE
DEPTH TO WATER

1RP-2295



8/4/2020, 1:52:54 PM

- Override 1 Miscellaneous CO2, New Gas, Active Gas, Plugged
 Wells - Large Scale CO2, Active CO2, Plugged Gas, Cancelled Gas, Temporarily Abandoned
 ? undefined CO2, Cancelled CO2, Temporarily Abandoned Gas, New Injection, Active

1:4,514

0 0.03 0.07 0.13 mi

0 0.05 0.1 0.2 km

Oil Conservation Division of the New Mexico Energy, Minerals and Natural

New Mexico Oil Conservation Division

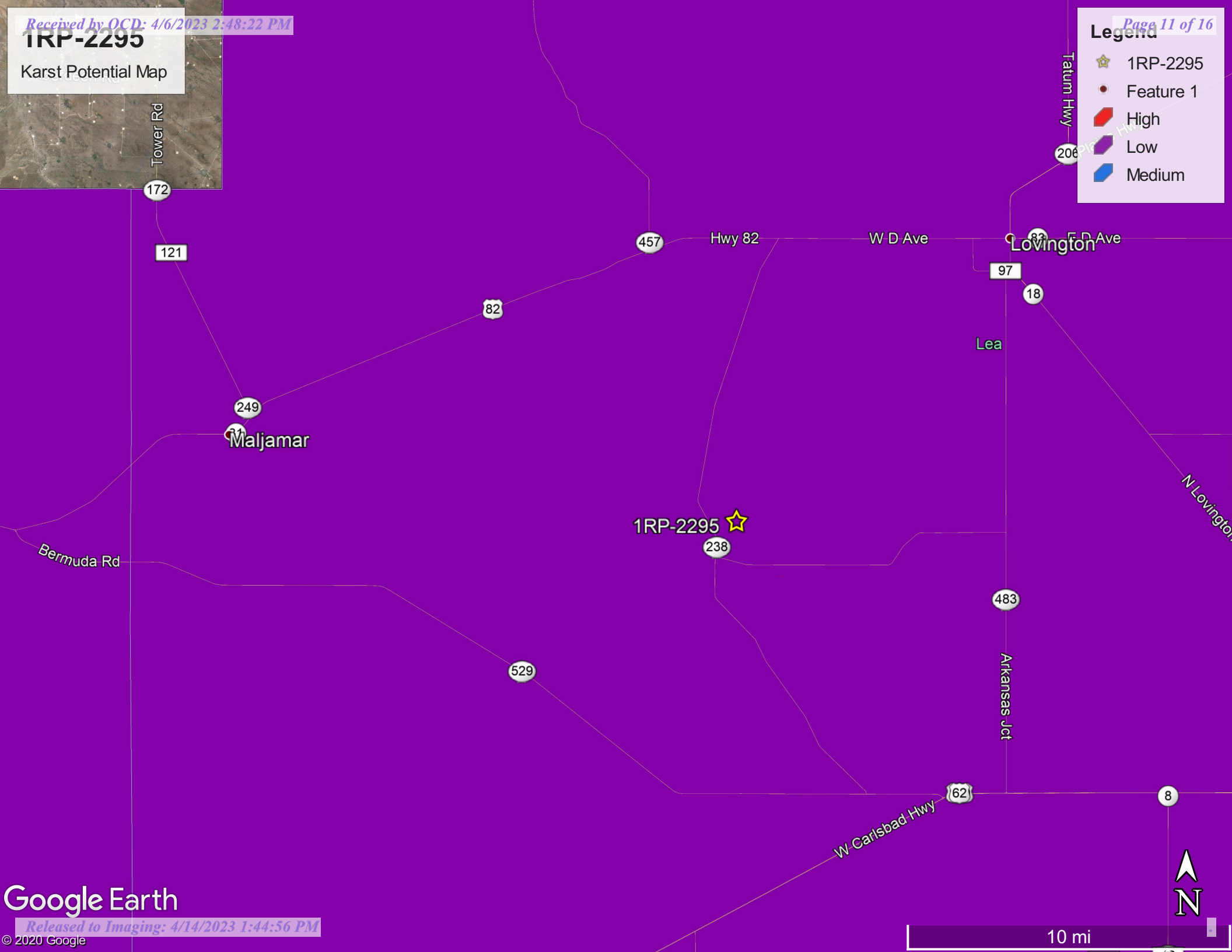
NM OCD Oil and Gas Map. <http://nm-emnrd.maps.arcgis.com/apps/webappviewer/index.html?id=4d017f2306164de29fd2fb9f8f35ca75>: New Mexico Oil Conservation Division

1RP-2295

Karst Potential Map

Legend

- ☆ 1RP-2295
- Feature 1
- High
- Low
- Medium

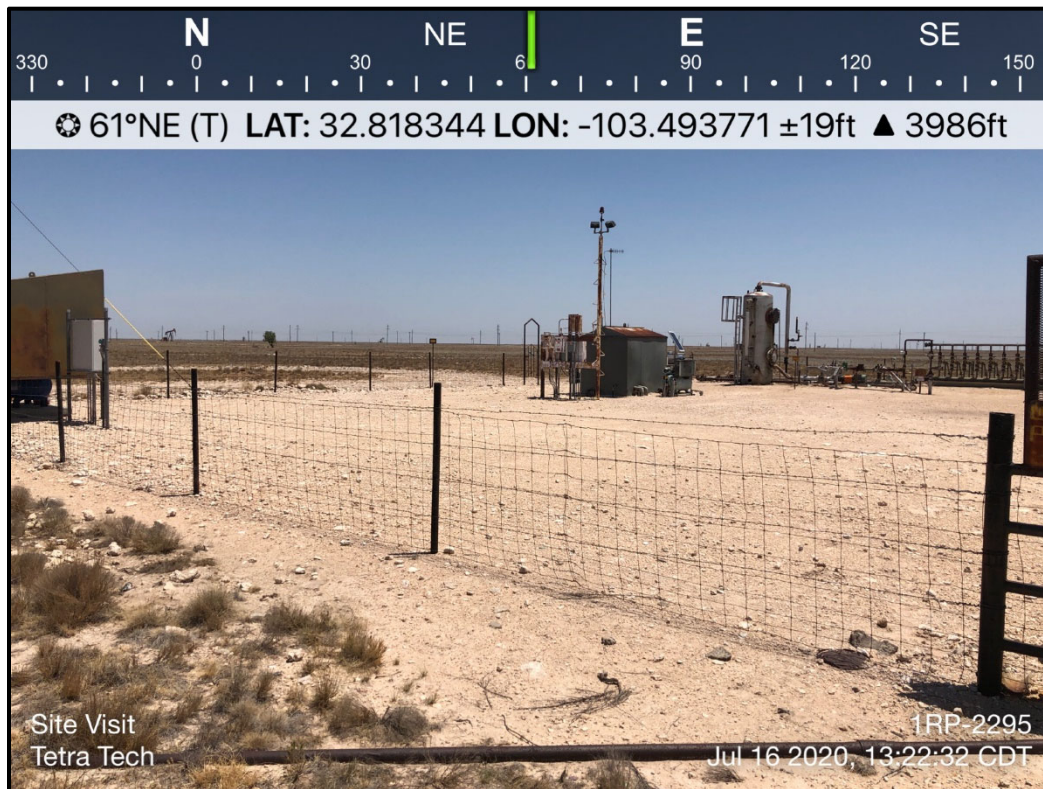


ATTACHMENT C

Photographic Documentation



TETRA TECH, INC. PROJECT NO. 212C-MD-02152	DESCRIPTION	View facing northeast of site signage.	1
	SITE NAME	EVGSAU Satellite #1 Bypass Line Release	7/16/2020



TETRA TECH, INC. PROJECT NO. 212C-MD-02152	DESCRIPTION	View facing northeast of well pad release area.	2
	SITE NAME	EVGSAU Satellite #1 Bypass Line Release	7/16/2020



TETRA TECH, INC. PROJECT NO. 212C-MD-02152	DESCRIPTION	View facing northeast of well pad release area.	3
	SITE NAME	EVGSAU Satellite #1 Bypass Line Release	7/16/2020



TETRA TECH, INC. PROJECT NO. 212C-MD-02152	DESCRIPTION	View facing southeast of apparent release area.	4
	SITE NAME	EVGSAU Satellite #1 Bypass Line Release	7/16/2020



TETRA TECH, INC. PROJECT NO. 212C-MD-02152	DESCRIPTION	View facing northeast over release area.	5
	SITE NAME	EVGSAU Satellite #1 Bypass Line Release	7/16/2020



TETRA TECH, INC. PROJECT NO. 212C-MD-02152	DESCRIPTION	General view facing south of entire lease pad/release area.	6
	SITE NAME	EVGSAU Satellite #1 Bypass Line Release	7/16/2020

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 204961

CONDITIONS

Operator: CIMAREX ENERGY CO. OF COLORADO 600 N. Marienfeld Street Midland, TX 79701	OGRID: 162683
	Action Number: 204961
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

Created By	Condition	Condition Date
jharimon	None	4/14/2023