



EAST VACUUM (GSA) UNIT #004  
nJXK1528944722

PREPARED BY SAPEC-ECO, LLC.  
PREPARED FOR MAVERICK PERMIAN, LLC.

## **Proposed Sampling and Remediation Work Plan**

April 11, 2025



Attn: NMOCD District 1  
 1625 N French Dr.  
 Hobbs, NM 88240

Re: Proposed Sampling and Remediation Work Plan  
 NMOCD Incident Number: **nJXK1528944722**  
 East Vacuum (GSA) Unit #004 API No. 30-025-02979  
 Unit F, Section 32, Township 17S, Range 35E 1980 FNL 1980 FWL Lea County, NM  
 GPS Coordinates: Latitude 32.7933311 Longitude -103.4820251 NAD83

Sapec-Eco (Sapec) has been contracted by Maverick Permian, LLC. (Maverick) to review and research this historic incident then prepare this proposed sampling and remediation work plan for a crude oil release that occurred at the East Vacuum (GSA) Unit #004 (Site). This incident was assigned Incident ID nJXK1528944722 by the New Mexico Oil Conservation Division (NMOCD).

### ***Release Information – nJXK1528944722***

The initial Form C-141 was submitted on October 16, 2015 (Appendix A) and stated that “On Oct. 15, 2015 at 1400 hrs MDT a flow line leak occurred at the EVGSAU 3236-004, which released 8 BPW and 10 BO with 4 BPW and 4 BO recovered. Spill area is approximately 75’x75’ with a depth of 2” in pasture area and will be remediated according to NMOCD and COPC guidelines. Immediate action by the MSO was to shut down the well and isolate the flowline. A work ordered has been submitted to repair the line. The affected area will be remediated according to NMOCD guidelines.” This initial Form C-141 was approved by the NMOCD the same day.

### ***Site Characterization***

This Site is in Lea County, NM, approximately twelve (12) miles southwest of Lovington, NM. The wellhead is in Unit F, Section 32, Township 17S, Range 35E, at 32.7933311 degrees latitude and -103.4820251 degrees longitude. The release area however, is located in Unit K, Section 33, Township 17S, Range 35E with the northernmost GPS coordinates being 32.790889, -103.480361. A Location Map is included for reference in Figure 5.

The New Mexico Bureau of Geology and Mineral Resources shows the geology at this Site includes Ogallala Formation. Alluvial and eolian deposits, and petrocalcic soils of the southern High Plains. Locally includes Qoa. A Geologic Unit Map can be found in Appendix C.

The soil type present at the Site is Kimbrough-Lea complex, dry, 0 to 3 percent slopes. The drainage class is well drained. Soil type information is according to the United States Department of Agriculture Natural Resources Conservation Service soil survey. The Soil Survey and a Soil Map can be referenced in Appendix C. Reference Figure 4 for a Topographic Map.

The Site resides in a low karst zone and is approximately 25.36 miles away from the nearest medium karst zone. Figure 3 refers to the Karst Map.

According to the New Mexico Office of the State Engineer, depth to the nearest groundwater in this area is 85 feet below grade surface (bgs). This information is recorded by L-04829-S which is situated approximately 0.37 miles away from the Site. This information is from 1979. The United States Geological Survey (USGS) offers the site USGS 324746103272801 17S.35E.33.2241413 which shows depth to the nearest groundwater is 82 feet bgs. The latest gauge of this site was conducted in 1991, and it is located approximately 0.5 miles from the Site.

The nearest surface water feature is an Unnamed Pond, and it is located approximately 1.75 miles to the northwest. The U.S. Fish and Wildlife Service National Wetlands Inventory shows the nearest wetland to be a Freshwater Emergent Wetland approximately 0.22 miles west. According to Fema’s National Flood Hazard Layer search, the Site is situated in Zone D – Area of Undetermined Flood Hazard and is greater than 5 miles away from the nearest flood hazard zone. See Appendix B for referenced Water Surveys and Water-Related Maps.

Readily available data were reviewed to determine if the Site lies within biologically sensitive areas. The U.S. Fish and Wildlife Services (USFWS) Information for Planning and Consultation (IPaC) and the New Mexico Department of Game and Fish (NMDGF) Environmental Review Tool (ERT) were queried to determine if sensitive wildlife or plant areas are present

at the Site. The Site is not identified to be within biologically sensitive areas where remediation/reclamation would impact sensitive plant or wildlife habitats. A Special Status Plant/Wildlife Map is included in Figure 2.

The remediation area at the Site is in previously disturbed and undisturbed areas developed for oil and gas extraction; therefore, a cultural resource survey will be required in the pasture area at the Site for planned remediation activities. The requirements of the Cultural Properties Protection (CCP) Rule will be followed.

### ***Assessment and Delineation Activities***

"Basin personnel were on site to assess the release January 27th, 2016. The release was mapped and photographed (Figure 1). On August 10th, 2016 Field samples were collected at surface and taken with depth and representative samples were sent to a commercial laboratory for analysis (Appendix B). Photo Documentation of these activities may be found in Appendix C."

On August 23, 2016, ConocoPhillips submitted a Corrective Action Plan for this incident. This plan was approved by the NMOCD on August 24, 2016. On October 15, 2020, ConocoPhillips submitted a Closure Letter Report for this incident. This report was denied by the NMOCD on April 18, 2023. This documentation is available for reference in Appendix E.

### ***Proposed Sampling & Remediation Activities***

In response to the previously denied Closure Letter Report, Maverick would like to propose the following:

- The area of concern measures approximately 3,023 square feet and is entirely in the pasture. Previously, remediation activities addressed a 6,698 square foot area in the pasture that encompassed this area of concern. The completion of these activities are evident in the Google Earth image from February 2017 (Figure 6).
- Collect discrete samples from within and around the edges of the release area to evaluate the presence of contaminants. Seventy-five (75) samples will be collected from 15 different sample points within the release area from depths of surface, 1', 2', 3', and 4' bgs. Thirty (30) samples will be collected from 6 different sample points around the edges of the release area from depths of surface, 1', 2', 3', and 4' bgs.
- All samples will be put on ice, prepared for delivery, then delivered to Envirotech Analytical Laboratories where they will be analyzed for all the constituents listed in Table 1 19.15.29.12 NMAC.
- A 48-hour sampling notification will be issued to the NMOCD for these sampling events. A variance request is included below for permission to use the delineation samples as confirmation samples depending on the sample results of the soil. A Proposed Sample Map referencing the release area and the previously remediated area can be found in Figure 1.
- If any samples do not verify delineation, then the "step-out" method will be used for horizontal delineation samples until sample results can confirm delineation. Also, for vertical delineation samples, any samples not verifying delineation will be advanced deeper until sample results can confirm delineation.
- Sample results that are over the regulatory limits of the less than 50-foot depth to groundwater section of Table 1 will be measured for total area and affected volume then removed via mechanical excavation means. The contaminated soil will be hauled to an NMOCD-approved disposal facility and clean, like material will be brought to the Site for backfilling the excavated area. Ensuring the top layer will be topsoil suitable for seeding.
- Once all sample results confirm delineation is complete, and contamination isn't present or has been removed, a remediation closure report will be drafted and submitted to the NMOCD Pay Portal for review/approval.

### ***Variance Request***

Maverick would like to respectfully request to use the delineation samples as confirmation samples in the event the laboratory samples results confirm that no contamination is present at any or all of the sample points. Maverick will diligently remediate all contaminants found that have reported results being over the regulatory limits of the less than 50-foot depth to groundwater section of Table 1 19.15.29.12 NMAC. Chlorides should be no more than 600 mg/kg. TPH (GRO+DRO+ORO) should be no more than 100 mg/kg. BTEX should be no more than 50 mg/kg. Benzene should be no more than 10 mg/kg.

Once official verification is received that contaminants are not present, or have been successfully removed from all areas within and around the Site, a remediation closure report will be drafted and submitted for approval.

### ***Request for Proposed Sampling & Remediation Work Plan Approval***



Maverick requests that this proposed sampling & remediation work plan for incident ID nJXK1528944722 be approved. All rules and regulations set forth in 19.15.29.12 NMAC have been complied with.

For questions or additional information, please reach out to:

Maverick Permian – Bryce Wagoner – [Bryce.Wagoner@mavresources.com](mailto:Bryce.Wagoner@mavresources.com) – (928) 241-1862

Sapec-Eco, LLC – Tom Bynum – [tombynum@sapec-eco.com](mailto:tombynum@sapec-eco.com) – (580) 748-1613

## ***Attachments***

### **Figures:**

- 1- Proposed Sample Map
- 2- Special Status Plant/Wildlife Map
- 3- Karst Map
- 4- Topographic Map
- 5- Location Map
- 6- February 2017 Image

### **Appendices:**

- Appendix A – Initial Form C-141
- Appendix B – Water Surveys & Water-Related Maps
- Appendix C – Soil Surveys, Soil Map, & Geologic Unit Map
- Appendix D – Photographic Documentation
- Appendix E – Corrective Action Plan & Closure Letter Report



***Figures:***

**Proposed Sample Map**

**Special Status Plant/Wildlife Map**

**Karst Map**

**Topographic Map**

**Location Map**

**February 2017 Image**

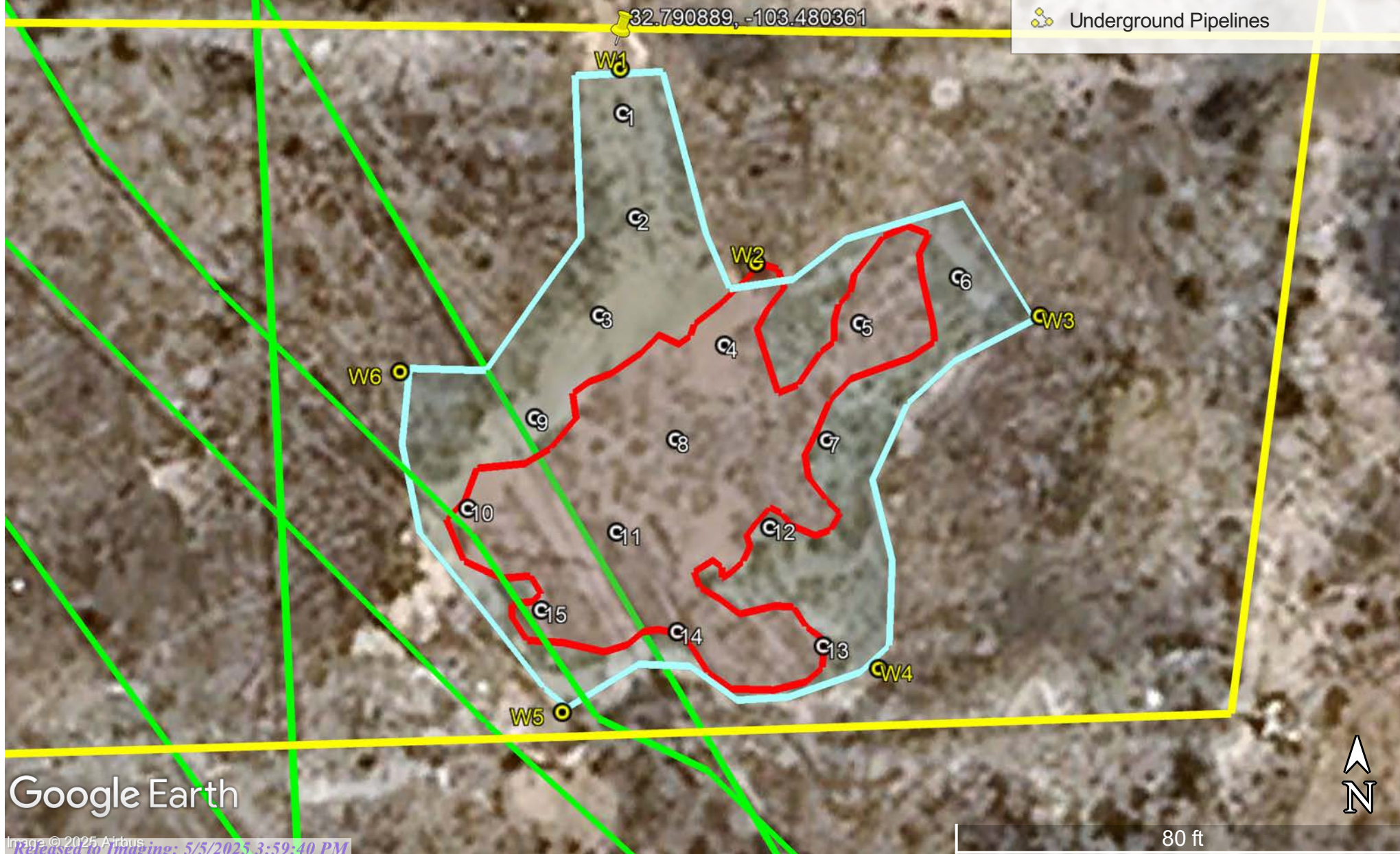


## East Vacuum (GSA) Unit #004

Maverick Permian  
API #30-025-02979  
Lea County, NM  
nJXK1528944722  
Proposed Sample Map

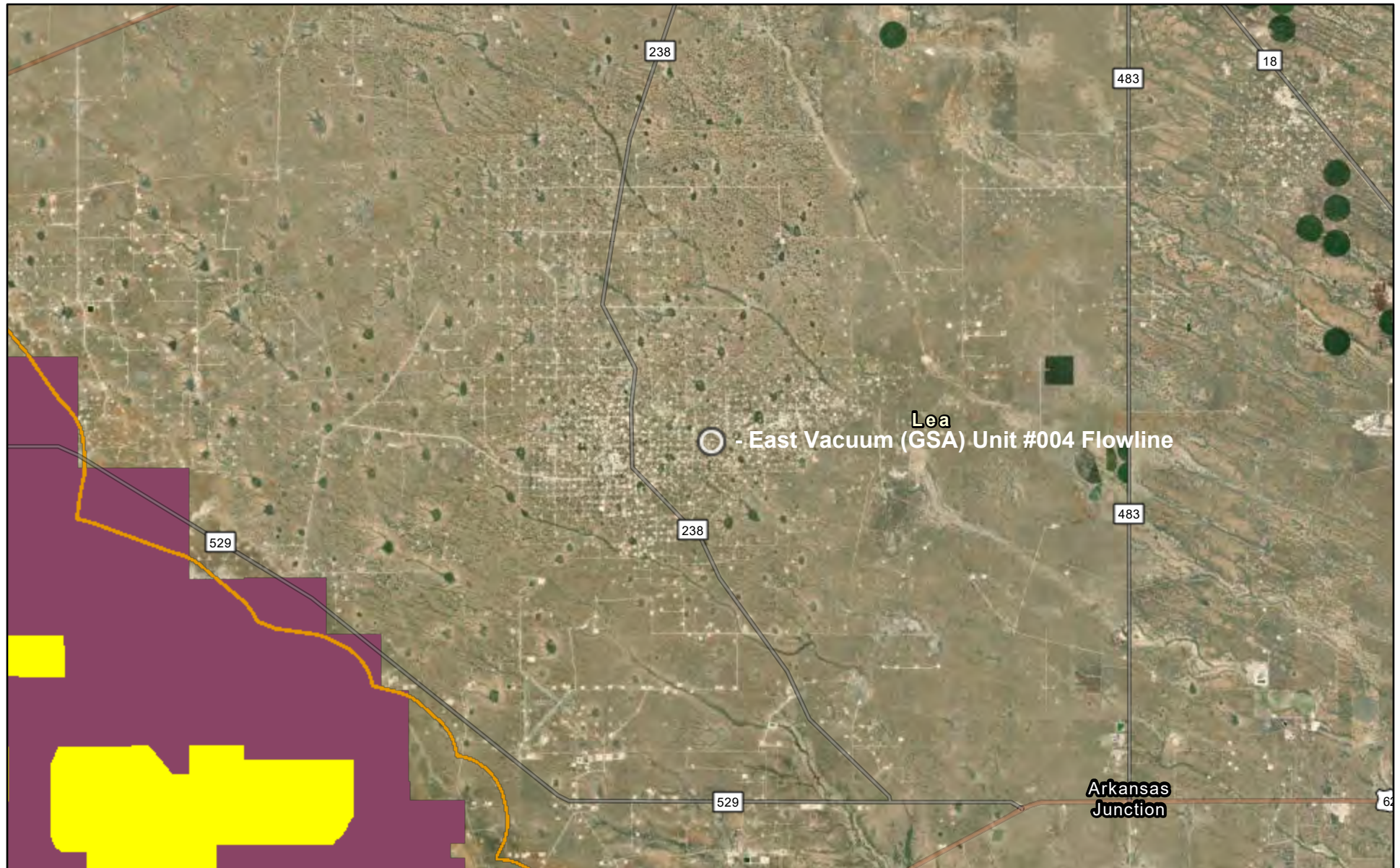
### Legend

- Flowlines
- Proposed horizontal samples
- Proposed vertical samples
- Release area - 3023 sqft
- Remediation area 2017 - 6698 sqft
- Underground Pipelines









## Special Status Plant/Wildlife Map

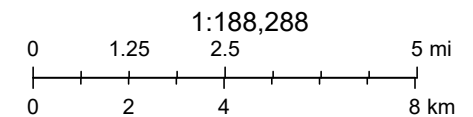


4/8/2025

-  Dunes Sage Brush Lizard Habitat
-  Lesser Prairie Chicken Habitat
-  Habitat Evaluation Area
-  Isolated Population Area

- World Imagery
- Low Resolution 15m Imagery
- High Resolution 60cm Imagery
- High Resolution 30cm Imagery

- Citations
- 38m Resolution Metadata






Earthstar Geographics, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community,

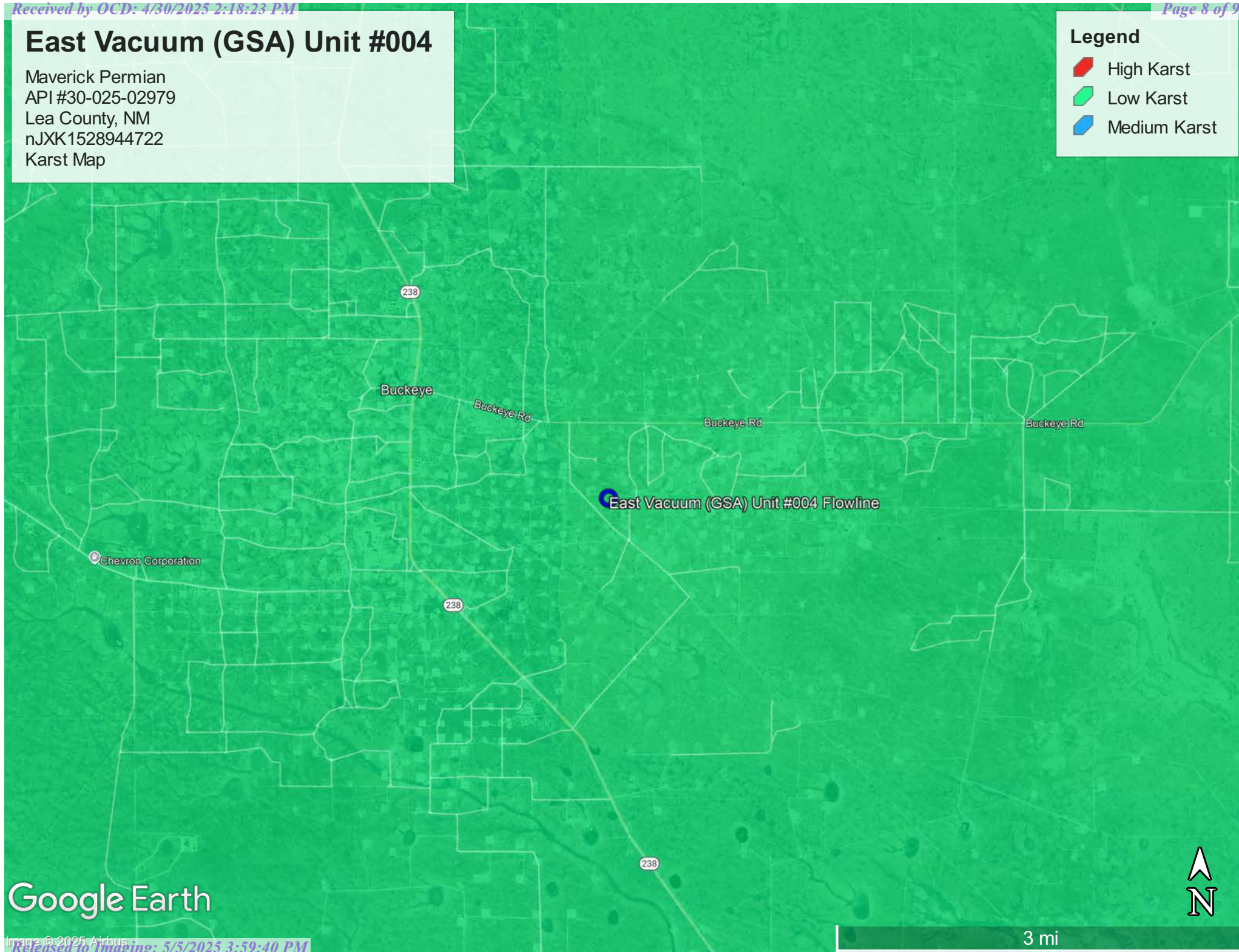


## East Vacuum (GSA) Unit #004

Maverick Permian  
API #30-025-02979  
Lea County, NM  
nJXK1528944722  
Karst Map

### Legend

-  High Karst
-  Low Karst
-  Medium Karst



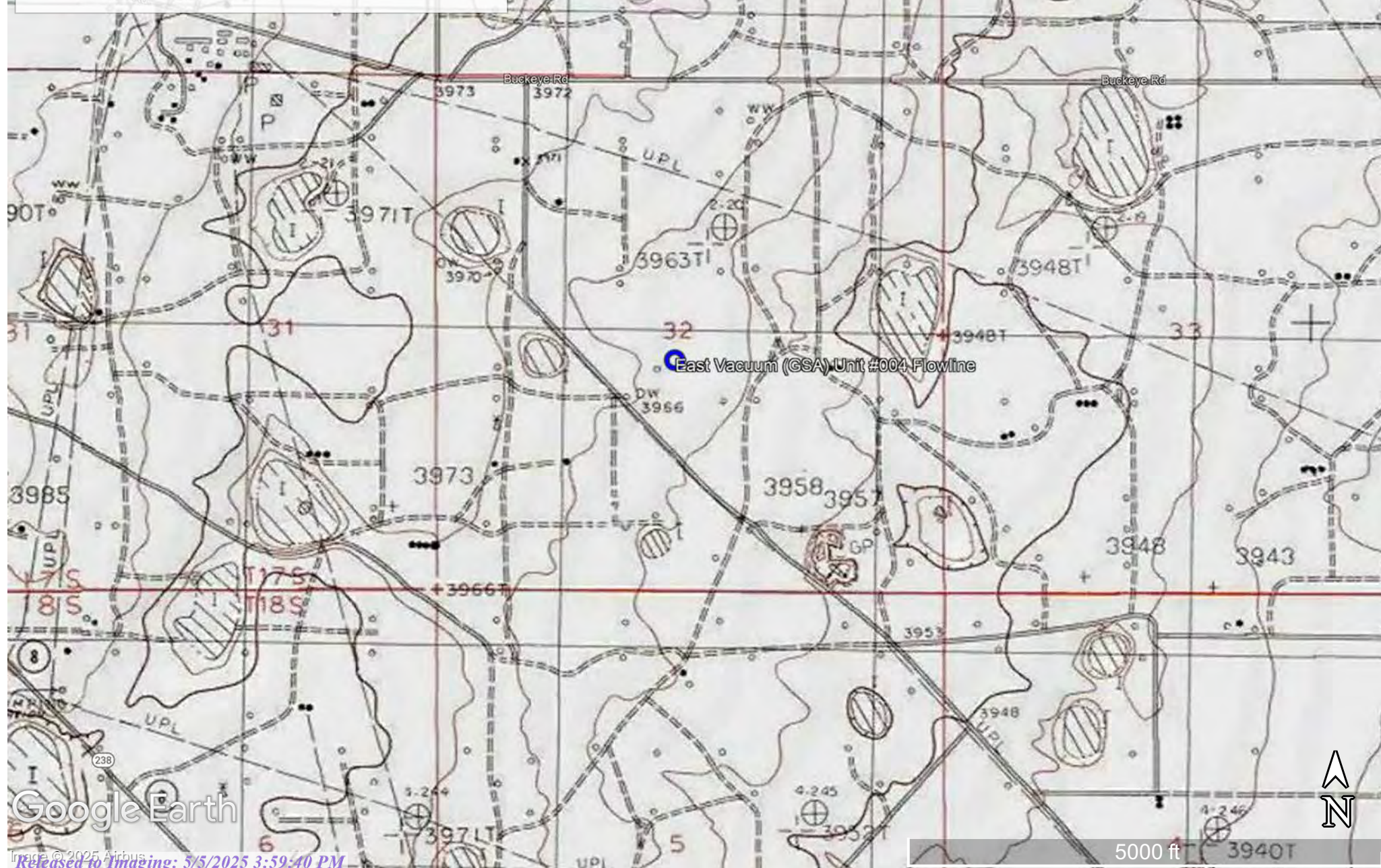
Google Earth

3 mi



Maverick Permian  
API #30-025-02979  
Lea County, NM  
nJXK1528944722  
Topographic Map

- East Vacuum (GSA) Unit #004 Flowline



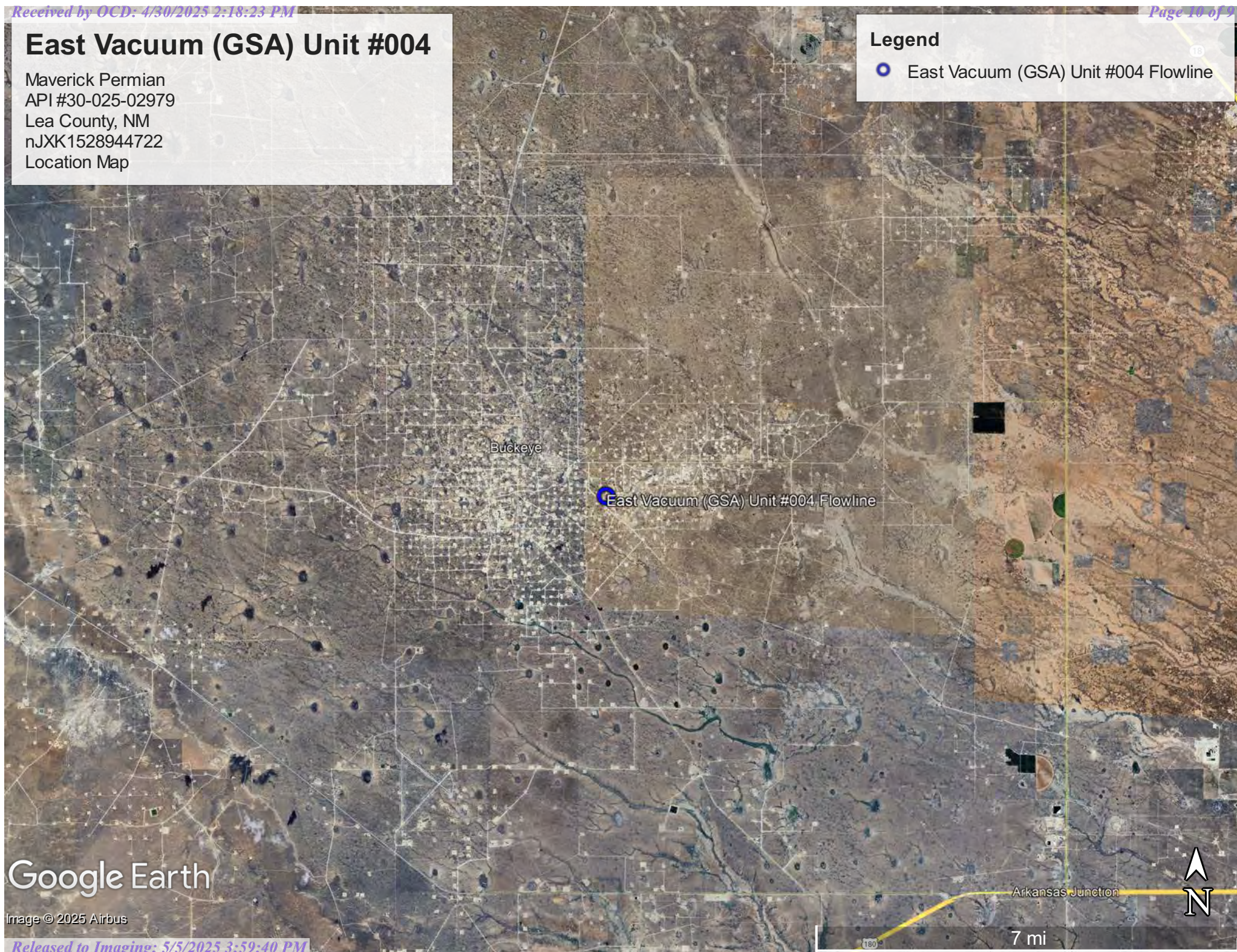


## East Vacuum (GSA) Unit #004

Maverick Permian  
API #30-025-02979  
Lea County, NM  
nJXK1528944722  
Location Map

### Legend

- East Vacuum (GSA) Unit #004 Flowline



Google Earth


Image © 2025 Airbus




## East Vacuum (GSA) Unit #004

Maverick Permian  
API #30-025-02979  
Lea County, NM  
nJXK1528944722  
February 2017 Image

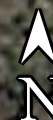
### Legend

 32.790889, -103.480361

 32.790889, -103.480361

Google Earth

Released to Imaging: 5/5/2025 3:59:40 PM



90 ft





## ***Appendix A***

**Initial Form 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

Form C-141  
Revised August 8, 2011  
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: <b>ConocoPhillips</b>	Contact: <b>Spencer Cluff</b>
Address: <b>29 Vacuum Complex Lane</b>	Telephone No. <b>575-746-7248</b>
Facility Name: <b>EVGSAU 3236-004</b>	Facility Type: <b>Well</b>
Surface Owner: <b>NMOCD</b>	Mineral Owner: <b>NMOCD</b>
API No. <b>30-025-02979</b>	

### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
F	32	17S	35E	1980	North	1980	West	<b>LEA</b>

**Latitude** 32.7933311 **Longitude** 103.4820251 **NAD83**

### NATURE OF RELEASE

Type of Release: <b>Spill</b>	Volume of Release: 19 BBLS	Volume Recovered: 8 BBLS
Source of Release: Flow line	Date and Hour of Occurrence 10/15/2015 12:00 am	Date and Hour of Discovery 10/15/2015 2:00 pm
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <b>Jamie Keyes</b>	
By Whom? <b>Spencer Cluff</b>	Date and Hour: <b>10/16/2015 9:20 am</b>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

**RECEIVED**

**By JKeyes at 12:30 pm, Oct 16, 2015**

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

On Oct. 15, 2015 at 1400 hrs MDT a flow line leak occurred at the EVGSAU 3236-004, which released 8 BPW and 10 BO with 4 BPW and 4 BO recovered. Spill area is approximately 75'x75' with a depth of 2" in pasture area and will be remediated according to NMOCD and COPC guidelines.

Describe Area Affected and Cleanup Action Taken.\*

Immediate action by the MSO was to shut down the well and isolate the flowline. A work ordered has been submitted to repair the line. The affected area will be remediated according to NMOCD 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>Spencer A. Cluff</i>	Approved by Environmental Specialist: <i>Jamie Keyes</i>	
Printed Name: Spencer A. Cluff	Approval Date: <b>10/16/2015</b>	Expiration Date: <b>12/16/2015</b>
Title: LEAD HSE	Conditions of Approval: Discrete site samples required. Delineate and remediate per NMOCD guidelines. Geotagged photos of remediation required.	
E-mail Address: <b>spencer.a.cluff@conocophillips.com</b>	Attached <input type="checkbox"/> <b>1RP 3923</b>	
Date: 10/16/2015	Phone: 575-746-7248	

\* Attach Additional Sheets If Necessary

pJXK1528944902

nJXK1528944722



## ***Appendix B***

### **Water Surveys**

### **Water-Related Maps**





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  
smallest to  
largest)

												(meters)		(In feet)		
POD Number	Code	Sub basin	County	Q64	Q16	Q4	Sec	Tws	Range	X	Y	Map	Distance	Well Depth	Depth Water	Water Column
<a href="#">L 04829 S</a>		L	LE		SW	SE	32	17S	35E	642554.0	3628586.0 *		597	198	85	113
<a href="#">L 04931</a>		L	LE		NW	NE	05	18S	35E	642561.0	3628183.0 *		979	237	70	167
<a href="#">L 04829 S5</a>		L	LE		SW	NW	33	17S	35E	643347.0	3629400.0 *		1081	220	90	130
<a href="#">L 14183 POD2</a>		L	LE	SW	NE	NE	31	17S	35E	641304.0	3629691.0		1144	227	105	122
<a href="#">L 14183 POD1</a>		L	LE	SW	NE	NE	31	17S	35E	641266.4	3629667.1		1166	229	106	123
<a href="#">L 14183 POD3</a>		L	LE	SW	NE	NE	31	17S	35E	641213.2	3629731.0		1243	227	104	123
<a href="#">L 03875 S2</a>	R	L	LE			NE	31	17S	35E	641131.0	3629576.0 *		1252	120	95	25
<a href="#">L 03875 S4</a>		L	LE			NE	31	17S	35E	641131.0	3629576.0 *		1252	120		
<a href="#">L 04631</a>		L	LE	NE	NW	NW	04	18S	35E	643465.0	3628292.0 *		1433	140	60	80
<a href="#">L 04880</a>		L	LE		NE	SW	33	17S	35E	643757.0	3629002.0 *		1462	145	90	55
<a href="#">L 04829 S4</a>		L	LE		NE	SW	29	17S	35E	642121.0	3630598.0 *		1482	200	90	110
<a href="#">L 04591</a>		L	LE		SE	NE	05	18S	35E	642970.0	3627785.0 *		1499	130	75	55

Average Depth to Water: 88 feet

Minimum Depth: 60 feet

Maximum Depth: 106 feet

Record Count: 12

Basin/County Search:

County: LE

UTM Filters (in meters):

Easting: 642300.08

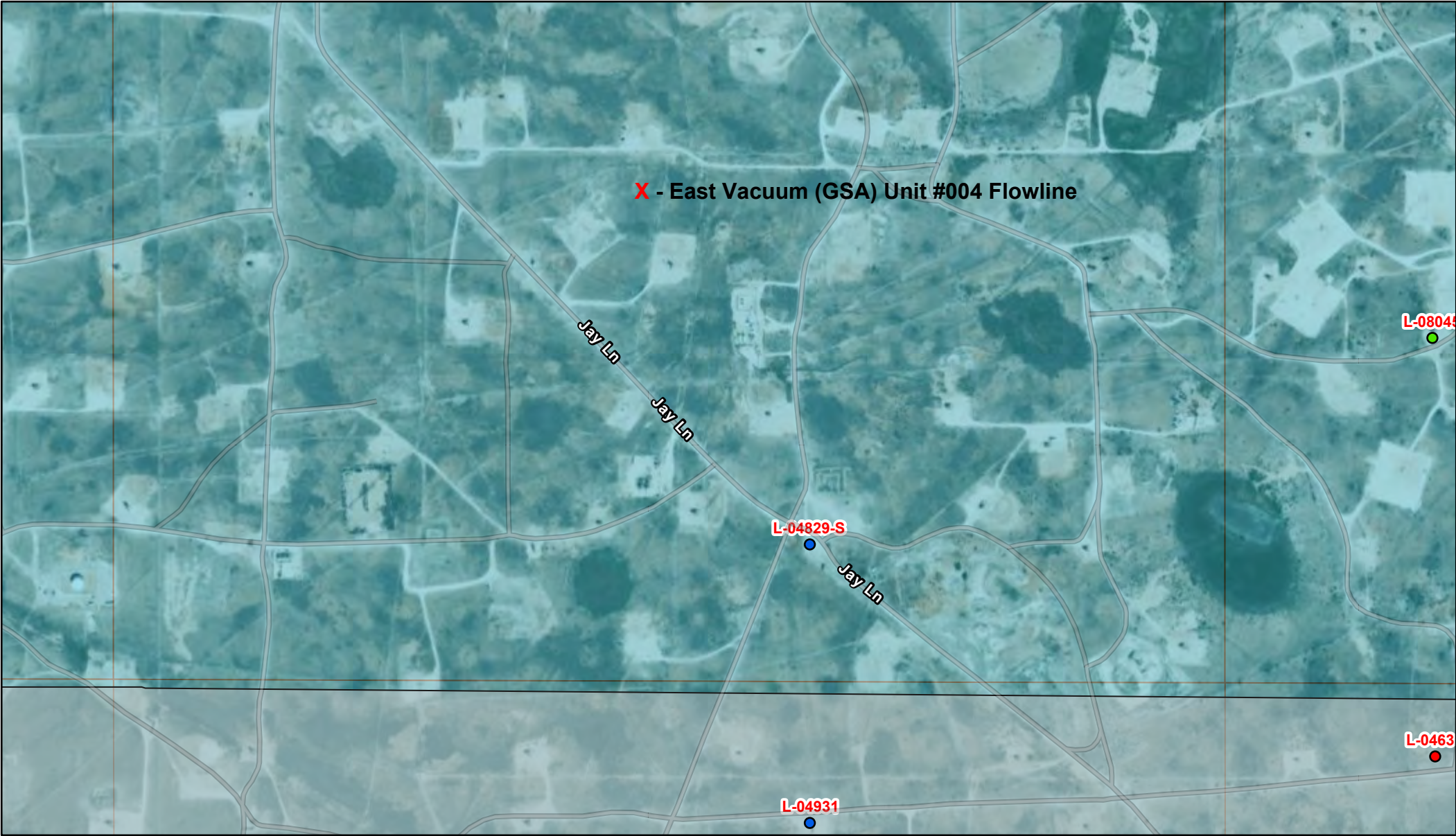
Northing: 3629126.81

Radius: 01500

\* 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.

# OSE POD Location Map



4/8/2025, 12:57:02 PM

GIS WATERS PODs



Active



Pending



Plugged



OSE District Boundary

Water Right Regulations



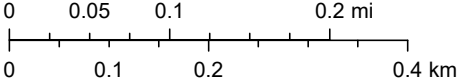
Closure Area

New Mexico State Trust Lands



Both Estates

1:9,028



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community. Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



[USGS Home](#)  
[Contact USGS](#)  
[Search USGS](#)

## National Water Information System: Web Interface

USGS Water Resources

Data Category:

Groundwater

Geographic Area:

United States

GO

Click to hide News Bulletins

- Explore the *NEW* [USGS National Water Dashboard](#) interactive map to access real-time water data from over 13,500 stations nationwide.

Groundwater levels for the Nation

 Important: [Next Generation Monitoring Location Page](#)

### Search Results -- 1 sites found

site\_no list =

- 324740103282801

Minimum number of levels = 1

[Save file of selected sites](#) to local disk for future upload

### USGS 324740103282801 17S.35E.32.21142

Available data for this site

Groundwater: Field measurements

GO

Lea County, New Mexico

Hydrologic Unit Code 12080003

Latitude 32°47'51", Longitude 103°28'39" NAD27

Land-surface elevation 3,965.00 feet above NGVD29

This well is completed in the High Plains aquifer (N100HGHPLN) national aquifer.

This well is completed in the Ogallala Formation (121OGLL) local aquifer.

#### Output formats

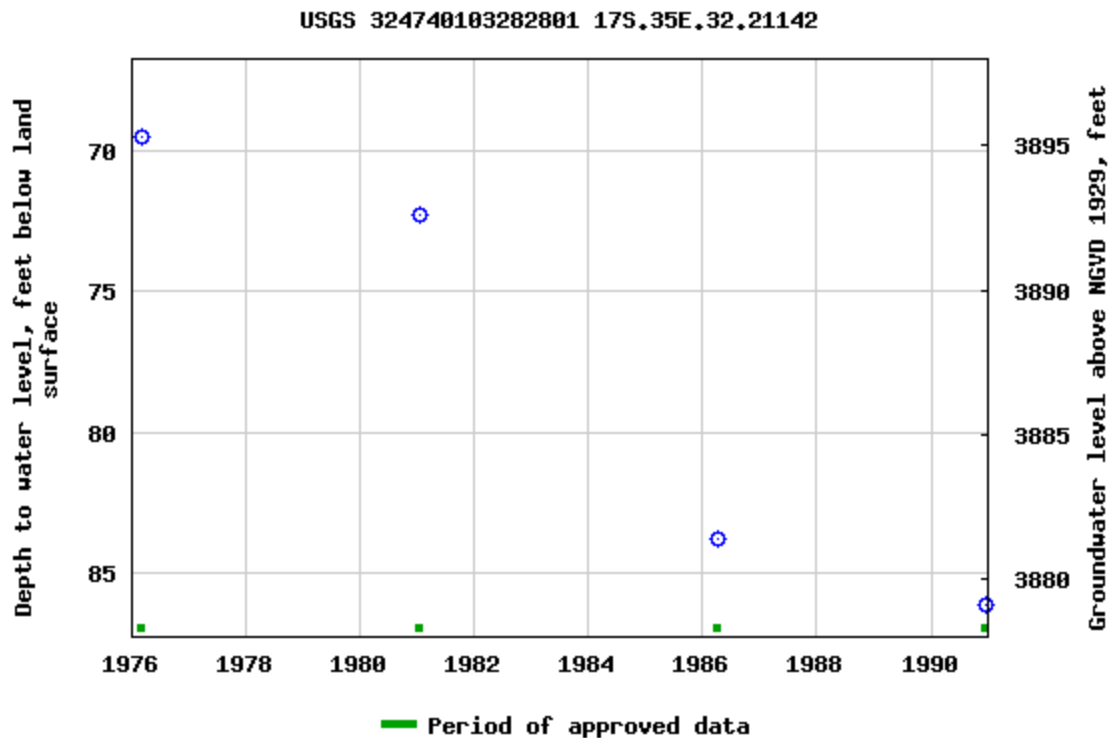
[Table of data](#)

[Tab-separated data](#)

[Graph of data](#)

[Reselect period](#)





Breaks in the plot represent a gap of at least one year between field measurements.

[Download a presentation-quality graph](#)

[Questions or Comments](#)

[Help](#)

[Data Tips](#)

[Explanation of terms](#)

[Subscribe for system changes](#)

[Accessibility](#)

[FOIA](#)

[Privacy](#)

[Policies and Notices](#)

[U.S. Department of the Interior](#) | [U.S. Geological Survey](#)

**Title: Groundwater for USA: Water Levels**

**URL: <https://nwis.waterdata.usgs.gov/nwis/gwlevels?>**



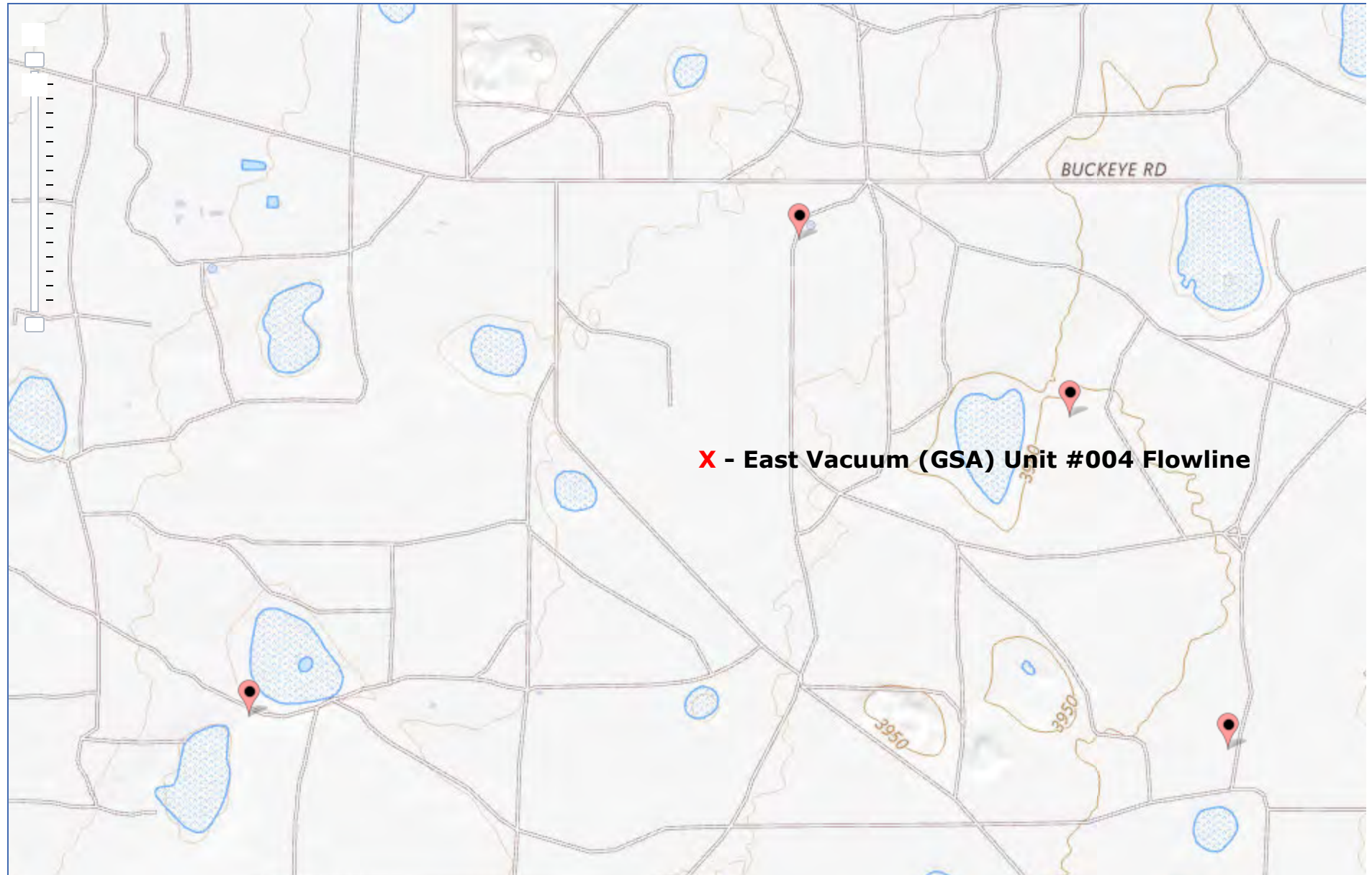
Page Contact Information: [USGS Water Data Support Team](#)

Page Last Modified: 2025-04-08 14:00:11 EDT

0.71 0.54 nadww01



## National Water Information System: Mapper



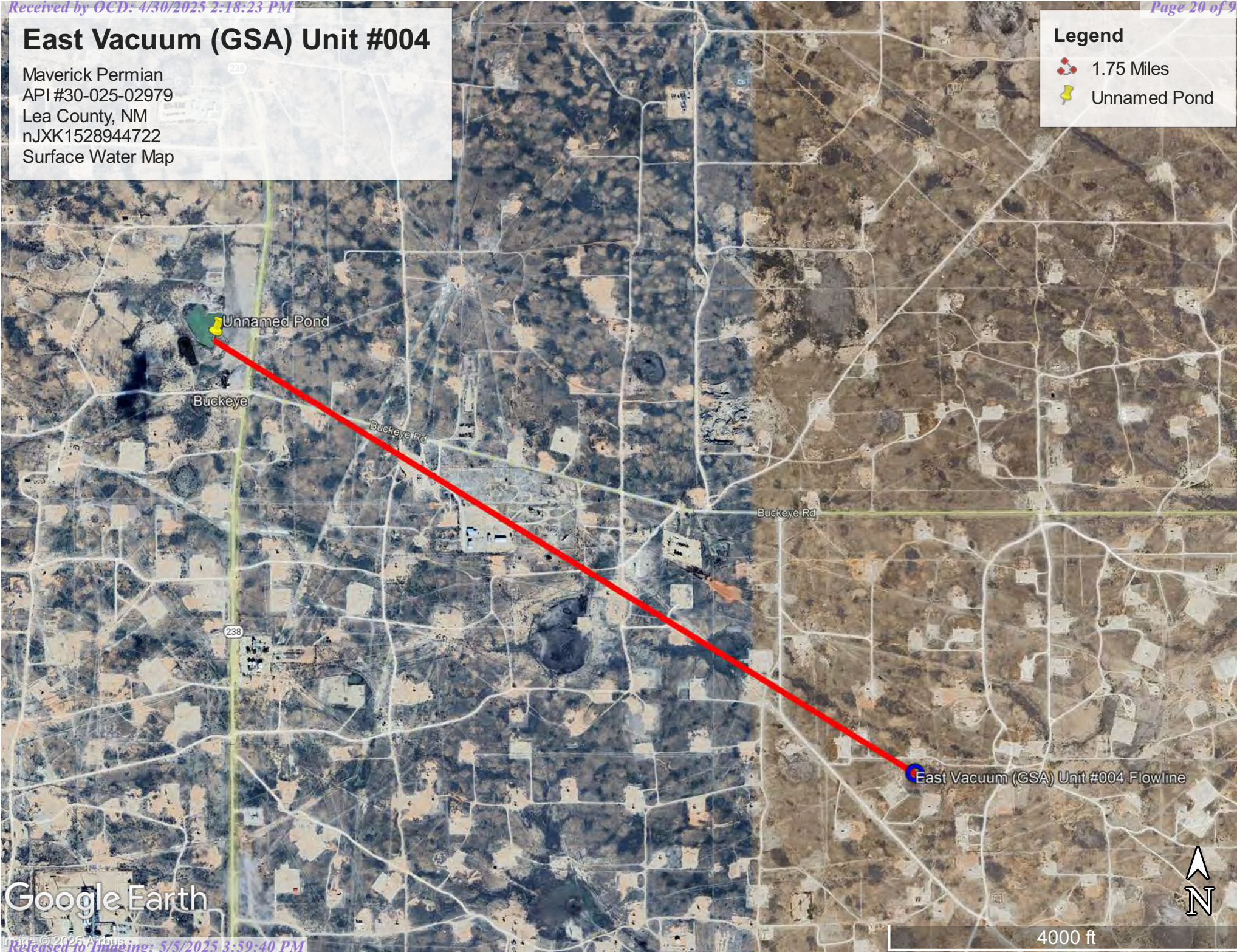


# East Vacuum (GSA) Unit #004

Maverick Permian  
API #30-025-02979  
Lea County, NM  
nJXX1528944722  
Surface Water Map

## Legend

- 1.75 Miles
- Unnamed Pond



Google Earth





## Wetlands Map



April 8, 2025

**Wetlands**

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond

- Lake
- Other
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.



# National Flood Hazard Layer FIRMMette



103°29'8"W 32°47'42"N



0 250 500 1,000 1,500 2,000 Feet

1:6,000

103°28'30"W 32°47'11"N

Released to Imaging: 5/5/2025 3:39:40 PM

Basemap Imagery Source: USGS National Map 2023

## Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
		Area of Undetermined Flood Hazard Zone D
GENERAL STRUCTURES		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
		17.5 Cross Sections with 1% Annual Chance Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped



The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 4/8/2025 at 6:02 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.



## ***Appendix C***

### **Soil Surveys**

### **Soil Map**

### **Geologic Unit Map**



Map Unit Description: Kimbrough-Lea complex, dry, 0 to 3 percent slopes---Lea County, New Mexico

---

## Lea County, New Mexico

### KU—Kimbrough-Lea complex, dry, 0 to 3 percent slopes

#### Map Unit Setting

*National map unit symbol:* 2tw46

*Elevation:* 2,500 to 4,800 feet

*Mean annual precipitation:* 14 to 16 inches

*Mean annual air temperature:* 57 to 63 degrees F

*Frost-free period:* 180 to 220 days

*Farmland classification:* Not prime farmland

#### Map Unit Composition

*Kimbrough and similar soils:* 45 percent

*Lea and similar soils:* 25 percent

*Minor components:* 30 percent

*Estimates are based on observations, descriptions, and transects of the mapunit.*

#### Description of Kimbrough

##### Setting

*Landform:* Playa rims, plains

*Down-slope shape:* Convex, linear

*Across-slope shape:* Concave, linear

*Parent material:* Loamy eolian deposits derived from sedimentary rock

##### Typical profile

*A - 0 to 3 inches:* gravelly loam

*Bw - 3 to 10 inches:* loam

*Bkkm1 - 10 to 16 inches:* cemented material

*Bkkm2 - 16 to 80 inches:* cemented material

##### Properties and qualities

*Slope:* 0 to 3 percent

*Depth to restrictive feature:* 4 to 18 inches to petrocalcic

*Drainage class:* Well drained

*Runoff class:* Very high

*Capacity of the most limiting layer to transmit water (Ksat):* Very low to moderately low (0.00 to 0.01 in/hr)

*Depth to water table:* More than 80 inches

*Frequency of flooding:* None

*Frequency of ponding:* None

*Calcium carbonate, maximum content:* 95 percent

*Maximum salinity:* Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)

*Sodium adsorption ratio, maximum:* 1.0

*Available water supply, 0 to 60 inches:* Very low (about 1.4 inches)

##### Interpretive groups

*Land capability classification (irrigated):* None specified

Map Unit Description: Kimbrough-Lea complex, dry, 0 to 3 percent slopes---Lea County, New Mexico

---

*Land capability classification (nonirrigated): 7s*  
*Hydrologic Soil Group: D*  
*Ecological site: R077DY049TX - Very Shallow 12-17" PZ*  
*Hydric soil rating: No*

## Description of Lea

### Setting

*Landform: Plains*  
*Down-slope shape: Convex*  
*Across-slope shape: Linear*  
*Parent material: Calcareous, loamy eolian deposits from the blackwater draw formation of pleistocene age over indurated caliche of pliocene age*

### Typical profile

*A - 0 to 10 inches: loam*  
*Bk - 10 to 18 inches: loam*  
*Bkk - 18 to 26 inches: gravelly fine sandy loam*  
*Bkkm - 26 to 80 inches: cemented material*

### Properties and qualities

*Slope: 0 to 3 percent*  
*Depth to restrictive feature: 22 to 30 inches to petrocalcic*  
*Drainage class: Well drained*  
*Runoff class: High*  
*Capacity of the most limiting layer to transmit water (Ksat): Very low to moderately low (0.00 to 0.06 in/hr)*  
*Depth to water table: More than 80 inches*  
*Frequency of flooding: None*  
*Frequency of ponding: None*  
*Calcium carbonate, maximum content: 90 percent*  
*Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)*  
*Sodium adsorption ratio, maximum: 3.0*  
*Available water supply, 0 to 60 inches: Very low (about 2.9 inches)*

### Interpretive groups

*Land capability classification (irrigated): None specified*  
*Land capability classification (nonirrigated): 7s*  
*Hydrologic Soil Group: D*  
*Ecological site: R077DY047TX - Sandy Loam 12-17" PZ*  
*Hydric soil rating: No*

## Minor Components

### Douro

*Percent of map unit: 12 percent*  
*Landform: Plains*  
*Down-slope shape: Linear*  
*Across-slope shape: Linear*  
*Ecological site: R077DY047TX - Sandy Loam 12-17" PZ*  
*Other vegetative classification: Unnamed (G077DH000TX)*  
*Hydric soil rating: No*

Map Unit Description: Kimbrough-Lea complex, dry, 0 to 3 percent slopes---Lea County, New Mexico

---

**Kenhill**

*Percent of map unit:* 12 percent

*Landform:* Plains

*Down-slope shape:* Linear

*Across-slope shape:* Linear

*Ecological site:* R077DY038TX - Clay Loam 12-17" PZ

*Hydric soil rating:* No

**Spraberry**

*Percent of map unit:* 6 percent

*Landform:* Playa rims, plains

*Down-slope shape:* Convex, linear

*Across-slope shape:* Linear

*Ecological site:* R077DY049TX - Very Shallow 12-17" PZ

*Other vegetative classification:* Unnamed (G077DH000TX)

*Hydric soil rating:* No

## Data Source Information

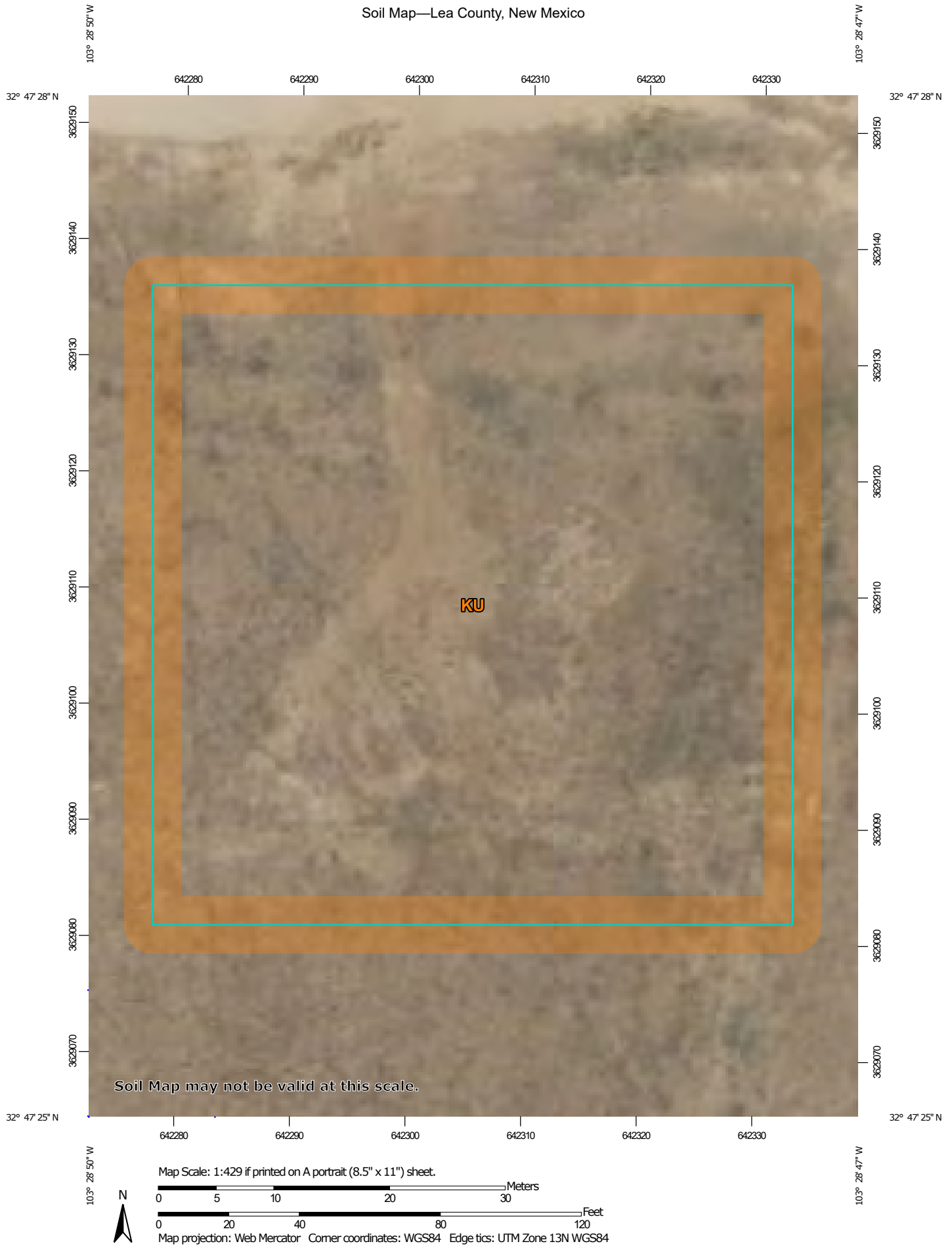
Soil Survey Area: Lea County, New Mexico

Survey Area Data: Version 21, Sep 3, 2024





Soil Map—Lea County, New Mexico



Natural Resources  
Conservation Service

Web Soil Survey  
National Cooperative Soil Survey

4/8/2025  
Page 1 of 3

## Soil Map—Lea County, New Mexico

## MAP LEGEND

## Area of Interest (AOI)

 Area of Interest (AOI)

## Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

## Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

## Water Features



Streams and Canals

## Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

## Background



Aerial Photography

## MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:20,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service

Web Soil Survey URL:

Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Lea County, New Mexico

Survey Area Data: Version 21, Sep 3, 2024

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Feb 7, 2020—May 12, 2020

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.





Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
KU	Kimbrough-Lea complex, dry, 0 to 3 percent slopes	0.8	100.0%
Totals for Area of Interest		0.8	100.0%

## East Vacuum (GSA) Unit #004

Maverick Permian  
API #30-025-02979  
Lea County, NM  
nJXK1528944722  
Geologic Unit Map

### Legend

-  Ogallala Formation
-  Piedmont alluvial deposits

Buckeye

East Vacuum (GSA) Unit #004 Flowline

Google Earth

4 mi







## ***Appendix D***

### **Photographic Documentation**











## ***Appendix E***

**Corrective Action Plan**

**Closure Letter Report**



**RECEIVED**

Page 35 of 97

By JKeyes at 12:38 pm, Aug 24, 2016



**APPROVED**

2 Confirmation bottom samples to be taken as indicated on map.

# CONOCOPHILLIPS

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

## EVGSAU 3236-004

(1RP-3923)

---

# Corrective Action Plan

API No. 30-025-02979

Release Date: October 15<sup>th</sup>, 2015

Unit Letter K, Section 32, Township 17S, Range 35E



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

**August 23, 2016**

**Jamie Keyes**

Environmental Specialist – New Mexico Oil Conservation Division  
Energy, Minerals and Natural Resources Department  
1625 N. French Dr.  
Hobbs, NM 88240

**RE: Corrective Action Plan  
ConocoPhillips EVGSAU 3236-004 (1RP-3923)  
UL/K sec. 32 T17S R35E  
API No. 30-025-02979**

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 1.7 miles southeast of Buck Eye, New Mexico. The initial C-141 states that the site is located at UL/F Sec. 32 T17S R35E. However, GIS mapping shows the site to be located within UL/K Sec. 32 T17S R35E. NM OSE, BLM and Basin installed monitor well records indicate that groundwater will likely be encountered at a depth of approximately 75 +/- feet.

On October 15<sup>th</sup>, 2015, CoP discovered a flow line leak. A total of 9 barrels produced water and 10 barrels of oil was released over 3,182 sq ft of pasture land. 4 barrels of produced water and 4 barrels of oil was recovered. NMOCD was notified of the release on October 16<sup>th</sup>, 2015, and an initial C-141 was submitted same day. NMOCD approved the initial C-141 on October 16<sup>th</sup>, 2015 (Appendix A).

Basin personnel were on site to assess the release January 27<sup>th</sup>, 2016. The release was mapped and photographed (Figure 1). On August 10<sup>th</sup>, 2016 Field samples were collected at surface and taken with depth and representative samples were sent to a commercial laboratory for analysis (Appendix B). Photo Documentation of these activities may be found in Appendix C.

**Corrective Action Plan**

Based on the assessment, the release area around vertical 1 will be excavated to a depth of 2 feet bgs. The release area around vertical 2 will be excavated to a depth of 1.5 feet bgs. Once all excavations are complete, discrete wall samples from the excavation 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) 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.

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 LPC 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,



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

Attachments:

Figure 1 – Proposed Excavation

Appendix A – Initial C-141

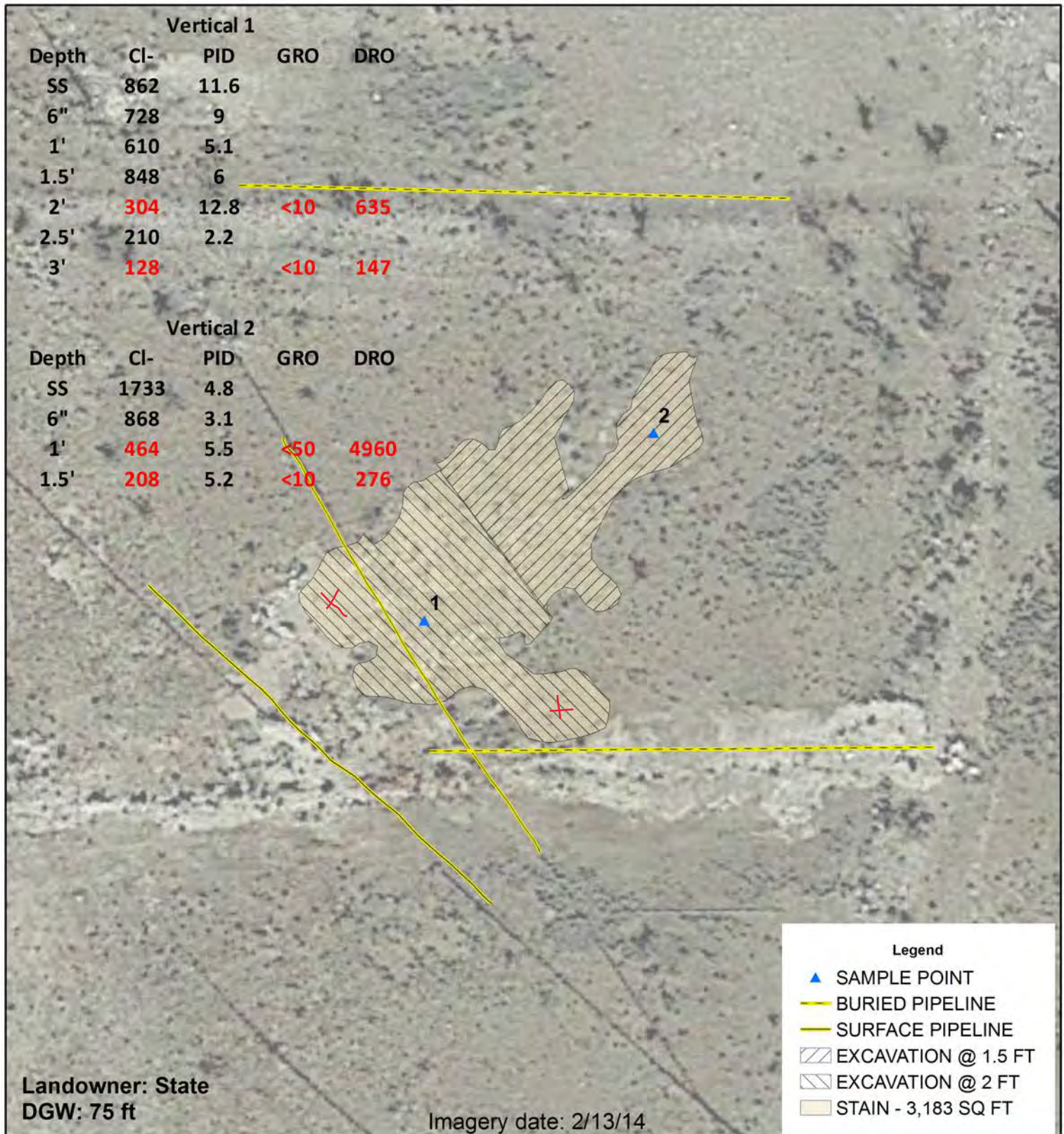
Appendix B – Laboratory Analysis

Appendix C – Photo Documentation



# Figures

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



**CONOCOPHILLIPS**  
**EVGSAU 3236-004**

1RP-3923

UL K SECTION 32  
T-17-S R-35-E  
LEA COUNTY, NM

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

GPS: 32.790675 -103.480333

0 10 20

HHH Feet

GPS date: 1/27/16 JK, 8/10/16 KN

Drawing date: 8/15/16

Drafted by: T. Grieco





# Appendix A

Intial C-141

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

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

Form C-141  
Revised August 8, 2011

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: <b>ConocoPhillips</b>	Contact: <b>Spencer Cluff</b>
Address: <b>29 Vacuum Complex Lane</b>	Telephone No. <b>575-746-7248</b>
Facility Name: <b>EVGSAU 3236-004</b>	Facility Type: <b>Well</b>

Surface Owner: <b>NMOCD</b>	Mineral Owner: <b>NMOCD</b>	API No. <b>30-025-02979</b>
-----------------------------	-----------------------------	-----------------------------

### LOCATION OF RELEASE

Unit Letter <b>F</b>	Section <b>32</b>	Township <b>17S</b>	Range <b>35E</b>	Feet from the <b>1980</b>	North/South Line <b>North</b>	Feet from the <b>1980</b>	East/West Line <b>West</b>	County <b>LEA</b>
-------------------------	----------------------	------------------------	---------------------	------------------------------	----------------------------------	------------------------------	-------------------------------	----------------------

Latitude 32.7933311 Longitude 103.4820251 NAD83

### NATURE OF RELEASE

Type of Release: <b>Spill</b>	Volume of Release: <b>19 BBLS</b>	Volume Recovered: <b>8 BBLS</b>
Source of Release: <b>Flow line</b>	Date and Hour of Occurrence <b>10/15/2015 12:00 am</b>	Date and Hour of Discovery <b>10/15/2015 2:00 pm</b>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <b>Jamie Keyes</b>	
By Whom? <b>Spencer Cluff</b>	Date and Hour: <b>10/16/2015 9:20 am</b>	
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.\*

On Oct. 15, 2015 at 1400 hrs MDT a flow line leak occurred at the EVGSAU 3236-004, which released 8 BPW and 10 BO with 4 BPW and 4 BO recovered. Spill area is approximately 75'x75' with a depth of 2" in pasture area and will be remediated according to NMOCD and COPC guidelines.

Describe Area Affected and Cleanup Action Taken.\*

Immediate action by the MSO was to shut down the well and isolate the flowline. A work order has been submitted to repair the line. The affected area will be remediated according to NMOCD 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>Spencer A. Cluff</i>	Approved by Environmental Specialist: <i>Jamie Keyes</i>	
Printed Name: <b>Spencer A. Cluff</b>	Approval Date: <b>10/16/2015</b>	Expiration Date: <b>12/16/2015</b>
Title: <b>LEAD HSE</b>	Conditions of Approval: Discrete site samples required. Delineate and remediate per NMOCD guidelines. Geotagged photos of remediation required.	
E-mail Address: <b>spencer.a.cluff@conocophillips.com</b>	Attached <input type="checkbox"/> IRP 3923	
Date: <b>10/16/2015</b>	Phone: <b>575-746-7248</b>	

\* Attach Additional Sheets If Necessary

pJXK1528944902

nJXK1528944722



# 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

---

August 12, 2016

KYLE NORMAN

Basin Environmental Service

P.O. Box 301

Lovington, NM 88260

RE: EVGSAU 3236-004

Enclosed are the results of analyses for samples received by the laboratory on 08/11/16 11:30.

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](http://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 "Coley D. Keene".

Celey D. Keene

Lab Director/Quality Manager





PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

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

Received: 08/11/2016  
 Reported: 08/12/2016  
 Project Name: EVGSAU 3236-004  
 Project Number: NONE GIVEN  
 Project Location: CONOCO PHILLIPS

Sampling Date: 08/10/2016  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: PT. 1 @ 2' (H601791-01)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>304</b>	16.0	08/11/2016	ND	448	112	400	3.64	
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	08/12/2016	ND	193	96.3	200	2.73	
<b>DRO &gt;C10-C28</b>	<b>635</b>	10.0	08/12/2016	ND	197	98.4	200	3.77	
Surrogate: 1-Chlorooctane	85.6 %	35-147							
Surrogate: 1-Chlorooctadecane	114 %	28-171							

**Sample ID: PT. 2 @ 1' (H601791-02)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>464</b>	16.0	08/11/2016	ND	448	112	400	3.64	
TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<50.0	50.0	08/12/2016	ND	193	96.3	200	2.73	
<b>DRO &gt;C10-C28</b>	<b>4960</b>	50.0	08/12/2016	ND	197	98.4	200	3.77	
Surrogate: 1-Chlorooctane	96.1 %	35-147							
Surrogate: 1-Chlorooctadecane	153 %	28-171							

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

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

Received: 08/11/2016  
 Reported: 08/12/2016  
 Project Name: EVGSAU 3236-004  
 Project Number: NONE GIVEN  
 Project Location: CONOCO PHILLIPS

Sampling Date: 08/10/2016  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: PT. 2 @ 1.5' (H601791-03)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	208	16.0	08/11/2016	ND	448	112	400	3.64	
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	08/12/2016	ND	193	96.3	200	2.73	
DRO >C10-C28	276	10.0	08/12/2016	ND	197	98.4	200	3.77	

Surrogate: 1-Chlorooctane 86.0 % 35-147

Surrogate: 1-Chlorooctadecane 88.6 % 28-171

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

---

### Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

---

Cardinal Laboratories

\*=Accredited Analyte

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A handwritten signature in black ink, appearing to read "Celey D. Keene", is written over a light blue horizontal line.

---

Celey D. Keene, Lab Director/Quality Manager





# **CARDINAL LABORATORIES**

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603  
(505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325) 673-7020

## **CHAIN-OF-CUSTODY AND ANALYSIS REQUEST**

<b>Company Name:</b> Conoco Phillips <b>Project Manager:</b> Kyle Norman <b>Address:</b> <b>City:</b> <b>State:</b> <b>Zip:</b> <b>Phone #:</b> <b>Fax #:</b> <b>Project #:</b> <b>Project Owner:</b> <b>Project Name:</b> <b>Project Location:</b> <i>EUGSAU 3236-004</i> <b>Sampler Name:</b> <i>Kyle Norman</i>				<b>BILL TO</b> <b>P.O. #:</b> <i>Conoco Phillips</i> <b>Company:</b> Basin Environmental <b>Attn:</b> <b>Address:</b> 419 W. Cain <b>City:</b> Hobbs <b>State:</b> NM <b>Zip:</b> 88240 <b>Phone #:</b> <b>Fax #:</b>				<b>ANALYSIS REQUEST</b>																		
						Chlorides TPH 8015 M BTEX Texas TPH Complete Cations/Anions TDS																				
FOR LAB USE ONLY																										
Lab I.D.		Sample I.D.		(G/RAB OR C/COMP.) # CONTAINERS	MATRIX					PRESERV.		SAMPLING														
					GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:	ICE / COOL	OTHER :	DATE	TIME											
<i>H601791</i>																										
<i>1 P+.1 @ 2 ft.</i>				<i>G</i>	<i>1</i>								<i>8-10-16</i>	<i>2:00</i>	<i>✓</i>	<i>✓</i>										
<i>2 P+.2 @ 1 ft.</i>				<i>G</i>	<i>1</i>								<i>8-10-16</i>	<i>2:30</i>	<i>✓</i>	<i>✓</i>										
<i>3 P+.2 @ 1.5 ft.</i>				<i>G</i>	<i>1</i>								<i>8-10-16</i>	<i>3:00</i>	<i>✓</i>	<i>✓</i>										

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

<b>Relinquished By:</b> <i>[Signature]</i> <b>Date:</b> <i>8-11-16</i> <b>Time:</b> <i>11:30</i>		<b>Received By:</b> <i>[Signature]</i> <b>Date:</b> <b>Time:</b>		<b>Phone Result:</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <b>Add'l Phone #:</b> <b>Fax Result:</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <b>Add'l Fax #:</b>	
<b>Relinquished By:</b> <b>Date:</b> <b>Time:</b>		<b>Received By:</b> <b>Date:</b> <b>Time:</b>		<b>REMARKS:</b> email results: knorman@basinenv.com; jkamplain@basinenv.com; tgrieco@basinenv.com <i>Justin Wright</i>	
<b>Delivered By: (Circle One)</b> Sampler - UPS - Bus - Other:		Sample Condition Cool Intact <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No		<b>CHECKED BY:</b> <i>[Signature]</i>	

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

*#75*



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

---

August 15, 2016

KYLE NORMAN

Basin Environmental Service

P.O. Box 301

Lovington, NM 88260

RE: EVGSAU 3236-004

Enclosed are the results of analyses for samples received by the laboratory on 08/12/16 11:10.

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](http://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 "Coley D. Keene". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

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

Received: 08/12/2016  
 Reported: 08/15/2016  
 Project Name: EVGSAU 3236-004  
 Project Number: NONE GIVEN  
 Project Location: CONOCO PHILLIPS

Sampling Date: 08/10/2016  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Celey D. Keene

**Sample ID: PT. 1 @ 3' (H601799-01)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>128</b>	16.0	08/12/2016	ND	448	112	400	3.64	
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	08/12/2016	ND	197	98.4	200	0.494	
<b>DRO &gt;C10-C28</b>	<b>147</b>	10.0	08/12/2016	ND	197	98.7	200	0.0887	
Surrogate: 1-Chlorooctane	87.3 %	35-147							
Surrogate: 1-Chlorooctadecane	95.0 %	28-171							

Cardinal Laboratories

\*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

---

### Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

---

Cardinal Laboratories

\*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

A handwritten signature in black ink, appearing to read "Celey D. Keene", is written over a light blue horizontal line.

---

Celey D. Keene, Lab Director/Quality Manager

**ARDINAL LABORATORIES**

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603  
(505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325) 673-7020

### CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]

# Appendix C

## Photo Documentation

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



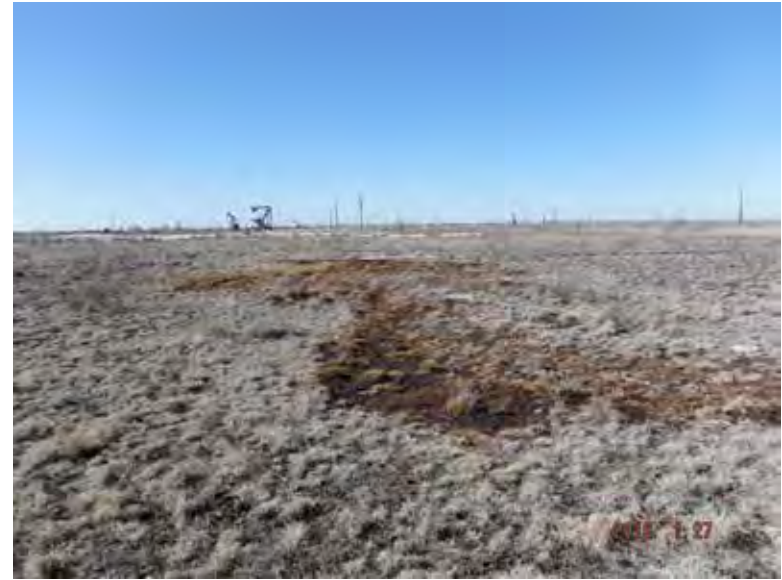
## ConocoPhillips EVGSAU 3236-004

Unit Letter K, Section 32, T17S, R35E



Initial Release, facing NE

1/27/2016



Initial Release, facing SW

1/27/2016



Installing vertical #1, facing W

8/10/2016



Installing vertical #2, facing S

8/10/2016



October 15, 2020

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

**Subject: Closure Letter Report  
ConocoPhillips  
1RP-3923  
EVGSAU 3236-004 Flowline Release  
PLSS Unit Letter K, Section 32, Township 17 South, and Range 35 East  
Lea County, New Mexico**

Mr. Billings:

On behalf of ConocoPhillips, Tetra Tech, Inc. (Tetra Tech) submits the following Closure Report for review. The ConocoPhillips East Vacuum Grayburg-San Andres Unit (EVGSAU) 3236-004 Flowline Release (Site) is located approximately 1.7 miles southeast of Buckeye in Lea County, New Mexico (Figure 1). The well listed in the C-141 is the EVGSAU 3236-004 (API No. 30-025-02979). The initial C-141 states that the release occurred in the Public Land Survey System (PLSS) Unit Letter F, Section 32, Township 17 South, and Range 35 East, which is the location of the EVGSAU 3236-004 well. However, according to information provided by ConocoPhillips, the Site is actually located along a flowline in PLSS Unit Letter K, Section 32, Township 17 South, and Range 35 East. The coordinates of the release area (Site) are 32.79072°, -103.48032°.

## BACKGROUND

According to the State of New Mexico C-141 Initial Report (Attachment A), on October 15, 2015 a leak occurred from a flowline from the EVGSAU 3236-004 well. The release consisted of 8 barrels (bbls) of produced water and 10 bbls of oil, and affected an approximately 75-foot (ft) by 75-ft by 2-inch area of pasture. During initial response activities approximately 4 bbls of oil and 4 bbls of produced water were recovered by a vacuum truck. Immediate notice was given to the New Mexico Oil Conservation Division (NMOCD) on the following day and the release was subsequently assigned the Remediation Permit (RP) number 1RP-3923.

## 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 is one (1) water well located within an 800-meter (approximately ½-mile) radius of the release Site. The average depth to groundwater is 85 feet. The site characterization data is shown in Attachment B.

**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](http://www.tetrattech.com)

Bradford Billings  
NMOCD  
October 15, 2020

## REGULATORY FRAMEWORK

Based upon the release footprint and in accordance with Subsection E of 19.15.29.12 NMAC, per 19.15.29.11 NMAC, the site characterization data was used 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. Based on the depth to groundwater at the Site, the RRALs for the Site are as follows:

- Benzene: 10 milligrams per kilogram (mg/kg);
- Total BTEX (sum of benzene, toluene, ethylbenzene, and xylene): 50 mg/kg;
- TPH (GRO + DRO + ORO): 100 mg/kg (0 – 4 ft bgs);
- TPH (GRO + DRO): 1,000 mg/kg;
- TPH (GRO + DRO + ORO): 2,500 mg/kg;
- Chloride: 600 mg/kg (0 – 4 ft bgs);
- Chloride: 10,000 mg/kg (>4 ft bgs).

## SITE ASSESSMENT SUMMARY

A Corrective Action Plan (CAP) dated August 23, 2016 was prepared by Basin Environmental Service Technologies (Basin) on behalf of ConocoPhillips and submitted to the NMOCD for approval (Attachment C). According to the CAP, Basin personnel were on Site on January 27, 2016 to photograph the release and map the extent of soil impacts. Basin returned to the Site on August 10, 2016 to assess the release. A total of eleven (11) samples were collected from two (2) locations (Vertical 1 and Vertical 2) and field screened for chlorides and organic vapors. Two samples from each location, including the basal sample from each location and the uppermost sample in each location that screened clean, were selected for laboratory analysis to achieve vertical delineation of the release.

Thus, a total of four (4) samples were sent to Cardinal Laboratories in Hobbs, New Mexico on August 10, 2016 and analyzed for chloride using EPA Method SM4500Cl-B and TPH using EPA Method 8015M. The laboratory analytical report and a Site diagram showing sample locations and a summary of analytical results are included in the CAP (Attachment C).

## ASSESSMENT RESULTS AND CORRECTIVE ACTION PLAN

Analytical results from the August 2016 assessment indicated chloride impacts above the Site RRAL of 600 mg/kg (0 – 4 ft bgs) in surface soils were limited to the top 1.5 feet at Vertical 1 and the top 1-foot at Vertical 2. Based on the results of the soil assessment, Basin proposed that the release area around Vertical 1 be excavated to a depth of 2 ft bgs, and the area around Vertical 2 be excavated to a depth of 1.5 ft bgs. Samples collected from the sidewalls would be field screened for chlorides and organic vapors. The excavation would be extended until the field data indicate that chlorides and TPH concentrations were below regulatory standards. At that point, discrete samples would be collected from the excavation walls and submitted for laboratory analysis. All excavated soils would be taken to an NMOCD-approved facility for disposal, the excavated area in the pasture would be backfilled with clean soil and then seeded to re-establish vegetative cover. The CAP was conditionally approved by the NMOCD (Attachment C). Records of remediation activities were not immediately available.

## VISUAL SITE INSPECTION SUMMARY

At the request of ConocoPhillips, Tetra Tech personnel conducted a records review and a visual Site inspection on June 4, 2020 at the release area evaluate to current conditions at the Site. The formerly impacted area footprint was identified from the description in the C-141 and the Site diagram provided in the CAP. Review of historical aerial imagery revealed clear evidence of remediation activities corresponding to the footprint provided in the CAP. This footprint (Figure 1) coincides with the remediated areas observed in the field. Photographic documentation from the visual inspection is included as Attachment D.



Bradford Billings  
NMOCD  
October 15, 2020

A list of observations made during the records review and visual Site inspection follow:

- Review of historical aerial imagery from February 2017 revealed clear evidence of remediation activities performed in the release footprint that corresponded to the approved CAP.
- No surficial staining was noted in the reported release extent footprint during the June 2020 visual Site inspection.
- Previously disturbed areas in the pasture were observed to contain uniform vegetative cover that reflects a life-form ratio of plus or minus fifty percent of pre-disturbance levels.

#### RECLAMATION AND RE-VEGETATION

From review of recent aerial photography and the visual Site inspection, it appears that the formerly impacted surface areas were restored to the conditions that existed prior to the release in accordance with 19.15.29.13 NMAC (Attachment D).

#### CONCLUSION

Based on remediation work performed at the Site and recent visual evidence of reestablished vegetation at the formerly impacted surface areas in the pasture, 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](mailto:christian.llull@tetrattech.com).

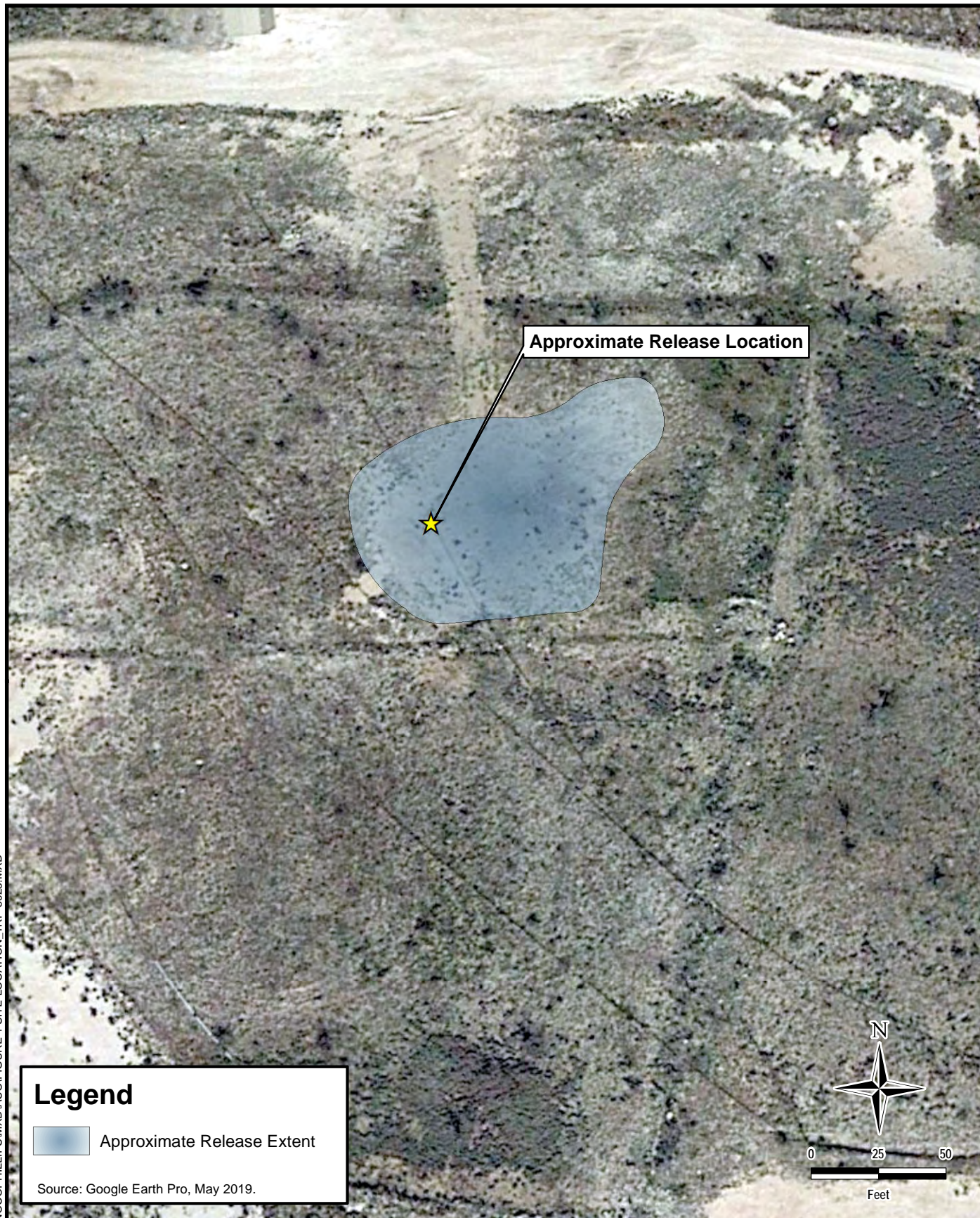
Sincerely,



Christian M. Llull  
Project Manager  
Tetra Tech, Inc.

## **FIGURES**





DOCUMENT PATH: D:\CONOCOPHILLIPS\MXD\FIGURE 1 SITE LOCATION\_1RP-3923.MXD



**TETRA TECH**

[www.tetrattech.com](http://www.tetrattech.com)

901 West Wall Street, Suite 100  
Midland, Texas 79701  
Phone: (432) 682-4559  
Fax: (432) 682-3946

**CONOCOPHILLIPS**

1RP-3923

(32.790726°, -103.480326°)  
LEA COUNTY, NEW MEXICO

**EVGSAU 3236-004 FLOWLINE RELEASE  
SITE LOCATION MAP**

PROJECT NO.: 212C-MD-02152

DATE: JUNE 15, 2020

DESIGNED BY: AAM

Figure No.

**1**



## **ATTACHMENT A C-141 Forms**

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

Form C-141  
Revised August 8, 2011

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: <b>ConocoPhillips</b>	Contact: <b>Spencer Cluff</b>
Address: <b>29 Vacuum Complex Lane</b>	Telephone No. <b>575-746-7248</b>
Facility Name: <b>EVGSAU 3236-004</b>	Facility Type: <b>Well</b>
Surface Owner: <b>NMOCD</b>	Mineral Owner: <b>NMOCD</b>
API No. <b>30-025-02979</b>	

### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
F	32	17S	35E	1980	North	1980	West	LEA

Latitude 32.7933311 Longitude 103.4820251 NAD83

### NATURE OF RELEASE

Type of Release: <b>Spill</b>	Volume of Release: 19 BBLS	Volume Recovered: 8 BBLS
Source of Release: Flow line	Date and Hour of Occurrence 10/15/2015 12:00 am	Date and Hour of Discovery 10/15/2015 2:00 pm
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <b>Jamie Keyes</b>	
By Whom? <b>Spencer Cluff</b>	Date and Hour: 10/16/2015 9:20 am	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

**RECEIVED**

**By JKeyes at 12:30 pm, Oct 16, 2015**

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

On Oct. 15, 2015 at 1400 hrs MDT a flow line leak occurred at the EVGSAU 3236-004, which released 8 BPW and 10 BO with 4 BPW and 4 BO recovered. Spill area is approximately 75'x75' with a depth of 2" in pasture area and will be remediated according to NMOCD and COPC guidelines.

Describe Area Affected and Cleanup Action Taken.\*

Immediate action by the MSO was to shut down the well and isolate the flowline. A work ordered has been submitted to repair the line. The affected area will be remediated according to NMOCD 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>Spencer A. Cluff</i>	Approved by Environmental Specialist: <i>Jamie Keyes</i>	
Printed Name: Spencer A. Cluff	Approval Date: 10/16/2015	Expiration Date: 12/16/2015
Title: LEAD HSE	Conditions of Approval: Discrete site samples required. Delineate and remediate per NMOCD guidelines. Geotagged photos of remediation required.	
E-mail Address: <b>spencer.a.cluff@conocophillips.com</b>	Attached <input type="checkbox"/> IRP 3923	
Date: 10/16/2015	Phone: 575-746-7248	

\* Attach Additional Sheets If Necessary

pJXK1528944902

nJXK1528944722

Incident ID	NJXK1528944722
District RP	1RP-3923
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: Charles BeauvaisTitle: Environmental CoordinatorSignature: Charles R. Beauvais IIDate: 10/14/2020email: charles.r.beauvais@conocophillips.comTelephone: 575-988-2043

### OCD Only

Received by: Jocelyn HarimonDate: 04/18/2023

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.

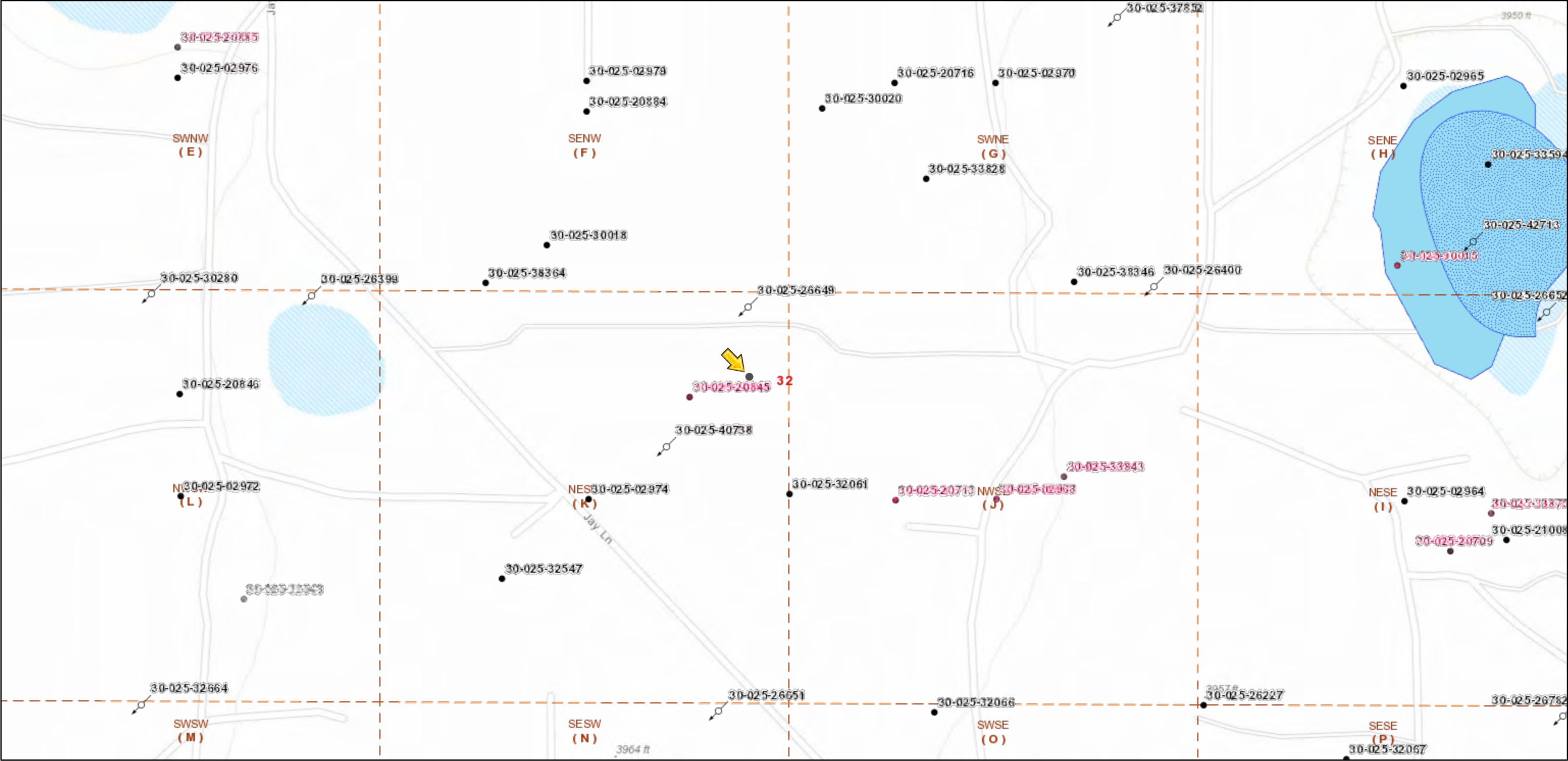
Closure Approved by: closure not approvedDate: 04/18/2023Printed Name: Jocelyn HarimonTitle: Environmental Specialist
































## **ATTACHMENT B**

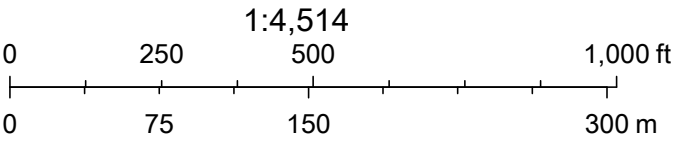
### **Site Characterization Data**

1RP-3923



7/28/2020, 10:29:09 AM

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



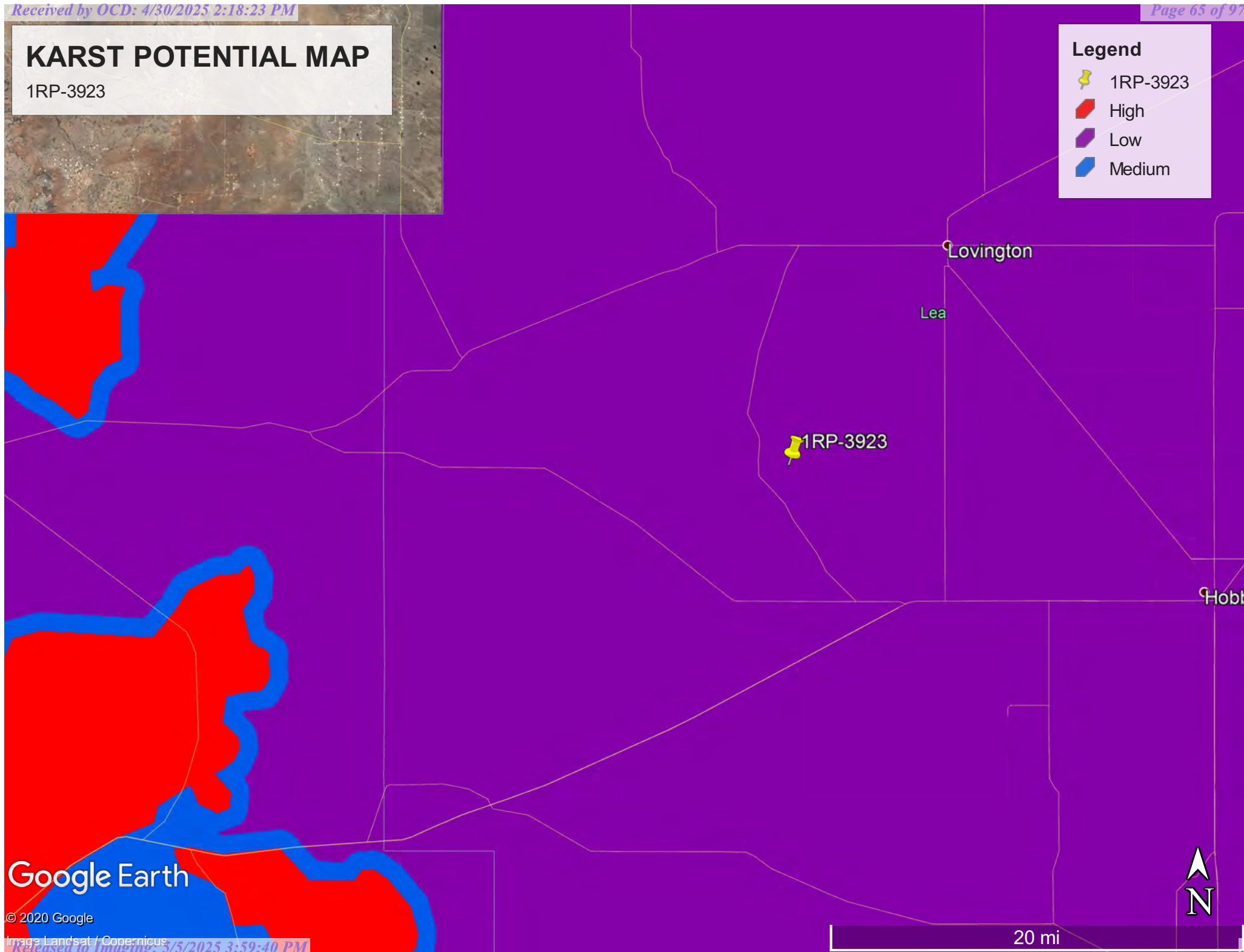
Oil Conservation Division of the New Mexico Energy, Minerals and Natural Resources Department., Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI,

# KARST POTENTIAL MAP

1RP-3923

## Legend

-  1RP-3923
-  High
-  Low
-  Medium



Google Earth

© 2020 Google

Image Landsat / Copernicus





# 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	Distance	Depth Well	Depth Water	Water Column
<a href="#">L 04829 S</a>	L	LE		3	4	32	17S	35E		642554	3628586*	578	198	85	113

Average Depth to Water: **85 feet**

Minimum Depth: **85 feet**

Maximum Depth: **85 feet**

Record Count: 1

### UTM NAD83 Radius Search (in meters):

**Easting (X):** 642304.194

**Northing (Y):** 3629108.134

**Radius:** 800

\*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.

9/25/20 1:08 PM

Page 1 of 1

WATER COLUMN/ AVERAGE  
DEPTH TO WATER

**ATTACHMENT C**  
**Corrective Action Plan (Basin, 2016)**

**RECEIVED**

Page 68 of 97

By JKeyes at 12:38 pm, Aug 24, 2016



**APPROVED**

2 Confirmation bottom samples to be taken as indicated on map.

# CONOCOPHILLIPS

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

## EVGSAU 3236-004

(1RP-3923)

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# Corrective Action Plan

API No. 30-025-02979

Release Date: October 15<sup>th</sup>, 2015

Unit Letter K, Section 32, Township 17S, Range 35E





PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

**August 23, 2016**

**Jamie Keyes**

Environmental Specialist – New Mexico Oil Conservation Division  
Energy, Minerals and Natural Resources Department  
1625 N. French Dr.  
Hobbs, NM 88240

**RE: Corrective Action Plan  
ConocoPhillips EVGSAU 3236-004 (1RP-3923)  
UL/K sec. 32 T17S R35E  
API No. 30-025-02979**

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 1.7 miles southeast of Buck Eye, New Mexico. The initial C-141 states that the site is located at UL/F Sec. 32 T17S R35E. However, GIS mapping shows the site to be located within UL/K Sec. 32 T17S R35E. NM OSE, BLM and Basin installed monitor well records indicate that groundwater will likely be encountered at a depth of approximately 75 +/- feet.

On October 15<sup>th</sup>, 2015, CoP discovered a flow line leak. A total of 9 barrels produced water and 10 barrels of oil was released over 3,182 sq ft of pasture land. 4 barrels of produced water and 4 barrels of oil was recovered. NMOCD was notified of the release on October 16<sup>th</sup>, 2015, and an initial C-141 was submitted same day. NMOCD approved the initial C-141 on October 16<sup>th</sup>, 2015 (Appendix A).

Basin personnel were on site to assess the release January 27<sup>th</sup>, 2016. The release was mapped and photographed (Figure 1). On August 10<sup>th</sup>, 2016 Field samples were collected at surface and taken with depth and representative samples were sent to a commercial laboratory for analysis (Appendix B). Photo Documentation of these activities may be found in Appendix C.

**Corrective Action Plan**

Based on the assessment, the release area around vertical 1 will be excavated to a depth of 2 feet bgs. The release area around vertical 2 will be excavated to a depth of 1.5 feet bgs. Once all excavations are complete, discrete wall samples from the excavation 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) 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.

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 LPC 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,



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

Attachments:

Figure 1 – Proposed Excavation

Appendix A – Initial C-141

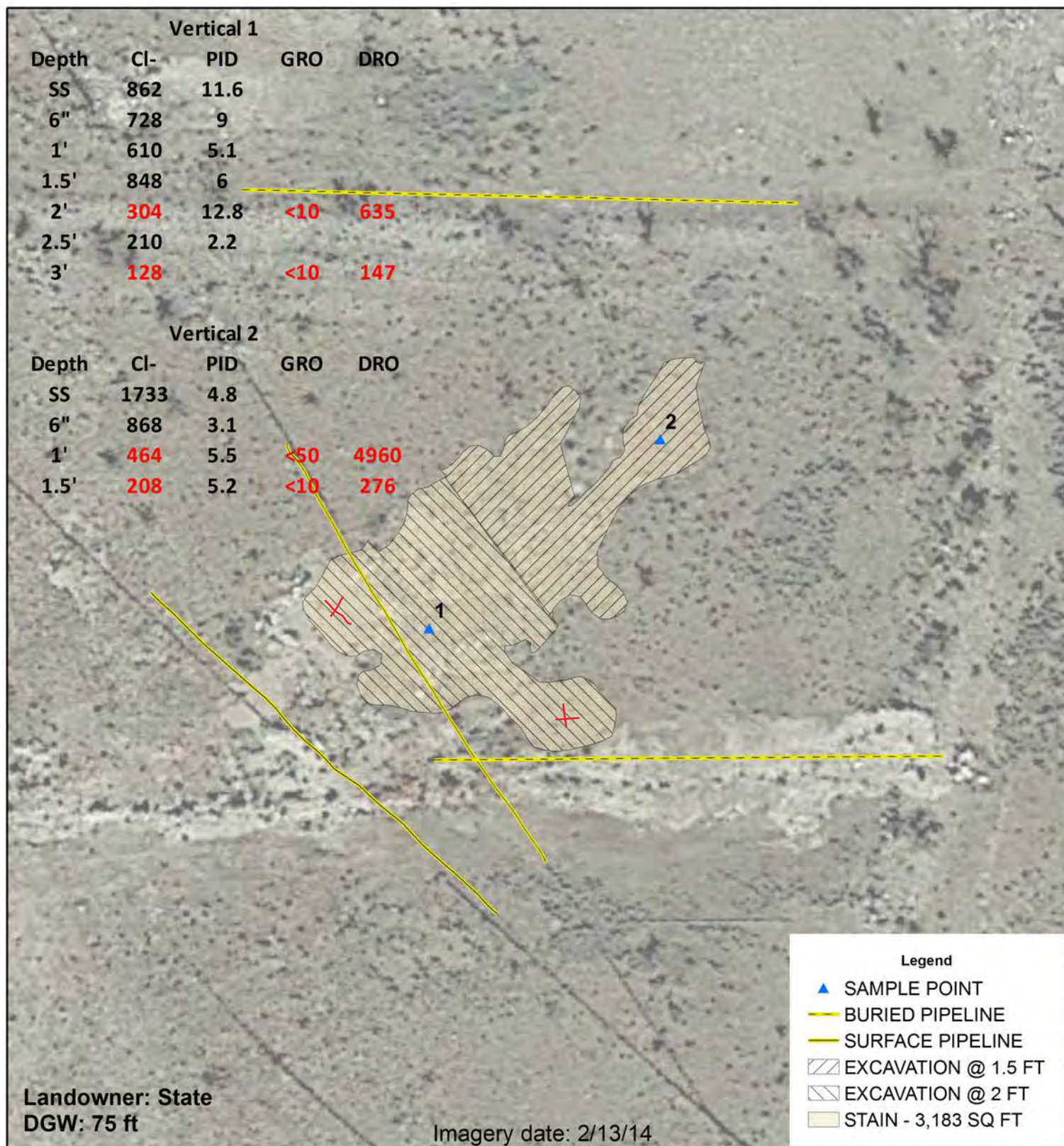
Appendix B – Laboratory Analysis

Appendix C – Photo Documentation



# Figures

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



**CONOCOPHILLIPS**  
**EVGSAU 3236-004**

1RP-3923

UL K SECTION 32  
T-17-S R-35-E  
LEA COUNTY, NM

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

GPS: 32.790675 -103.480333

0 10 20

HHH Feet

GPS date: 1/27/16 JK, 8/10/16 KN

Drawing date: 8/15/16

Drafted by: T. Grieco



# Appendix A

Intial C-141

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



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

Form C-141  
Revised August 8, 2011

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: <b>ConocoPhillips</b>	Contact: <b>Spencer Cluff</b>
Address: <b>29 Vacuum Complex Lane</b>	Telephone No. <b>575-746-7248</b>
Facility Name: <b>EVGSAU 3236-004</b>	Facility Type: <b>Well</b>

Surface Owner: <b>NMOCD</b>	Mineral Owner: <b>NMOCD</b>	API No. <b>30-025-02979</b>
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### LOCATION OF RELEASE

Unit Letter <b>F</b>	Section <b>32</b>	Township <b>17S</b>	Range <b>35E</b>	Feet from the <b>1980</b>	North/South Line <b>North</b>	Feet from the <b>1980</b>	East/West Line <b>West</b>	County <b>LEA</b>
-------------------------	----------------------	------------------------	---------------------	------------------------------	----------------------------------	------------------------------	-------------------------------	----------------------

Latitude 32.7933311 Longitude 103.4820251 NAD83

### NATURE OF RELEASE

Type of Release: <b>Spill</b>	Volume of Release: <b>19 BBLS</b>	Volume Recovered: <b>8 BBLS</b>
Source of Release: <b>Flow line</b>	Date and Hour of Occurrence <b>10/15/2015 12:00 am</b>	Date and Hour of Discovery <b>10/15/2015 2:00 pm</b>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <b>Jamie Keyes</b>	
By Whom? <b>Spencer Cluff</b>	Date and Hour: <b>10/16/2015 9:20 am</b>	
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.\*

On Oct. 15, 2015 at 1400 hrs MDT a flow line leak occurred at the EVGSAU 3236-004, which released 8 BPW and 10 BO with 4 BPW and 4 BO recovered. Spill area is approximately 75'x75' with a depth of 2" in pasture area and will be remediated according to NMOCD and COPC guidelines.

Describe Area Affected and Cleanup Action Taken.\*

Immediate action by the MSO was to shut down the well and isolate the flowline. A work order has been submitted to repair the line. The affected area will be remediated according to NMOCD 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>Spencer A. Cluff</i>	Approved by Environmental Specialist: <i>Jamie Keyes</i>	
Printed Name: <b>Spencer A. Cluff</b>	Approval Date: <b>10/16/2015</b>	Expiration Date: <b>12/16/2015</b>
Title: <b>LEAD HSE</b>	Conditions of Approval: Discrete site samples required. Delineate and remediate per NMOCD guidelines. Geotagged photos of remediation required.	
E-mail Address: <b>spencer.a.cluff@conocophillips.com</b>	Attached <input type="checkbox"/> IRP 3923	
Date: <b>10/16/2015</b>	Phone: <b>575-746-7248</b>	

\* Attach Additional Sheets If Necessary

pJXK1528944902

nJXK1528944722

# 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

---

August 12, 2016

KYLE NORMAN

Basin Environmental Service

P.O. Box 301

Lovington, NM 88260

RE: EVGSAU 3236-004

Enclosed are the results of analyses for samples received by the laboratory on 08/11/16 11:30.

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](http://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 "Coley D. Keene". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

Celey D. Keene

Lab Director/Quality Manager





PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

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

Received: 08/11/2016  
 Reported: 08/12/2016  
 Project Name: EVGSAU 3236-004  
 Project Number: NONE GIVEN  
 Project Location: CONOCO PHILLIPS

Sampling Date: 08/10/2016  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: PT. 1 @ 2' (H601791-01)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>304</b>	16.0	08/11/2016	ND	448	112	400	3.64	
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	08/12/2016	ND	193	96.3	200	2.73	
<b>DRO &gt;C10-C28</b>	<b>635</b>	10.0	08/12/2016	ND	197	98.4	200	3.77	
Surrogate: 1-Chlorooctane	85.6 %	35-147							
Surrogate: 1-Chlorooctadecane	114 %	28-171							

**Sample ID: PT. 2 @ 1' (H601791-02)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>464</b>	16.0	08/11/2016	ND	448	112	400	3.64	
TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<50.0	50.0	08/12/2016	ND	193	96.3	200	2.73	
<b>DRO &gt;C10-C28</b>	<b>4960</b>	50.0	08/12/2016	ND	197	98.4	200	3.77	
Surrogate: 1-Chlorooctane	96.1 %	35-147							
Surrogate: 1-Chlorooctadecane	153 %	28-171							

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

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

Received: 08/11/2016  
 Reported: 08/12/2016  
 Project Name: EVGSAU 3236-004  
 Project Number: NONE GIVEN  
 Project Location: CONOCO PHILLIPS

Sampling Date: 08/10/2016  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: PT. 2 @ 1.5' (H601791-03)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	208	16.0	08/11/2016	ND	448	112	400	3.64		
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	08/12/2016	ND	193	96.3	200	2.73		
DRO >C10-C28	276	10.0	08/12/2016	ND	197	98.4	200	3.77		

Surrogate: 1-Chlorooctane 86.0 % 35-147

Surrogate: 1-Chlorooctadecane 88.6 % 28-171

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



---

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

---

### Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

---

Cardinal Laboratories

\*=Accredited Analyte

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A handwritten signature in black ink, appearing to read "Celey D. Keene", is written over a light blue horizontal line.

---

Celey D. Keene, Lab Director/Quality Manager







PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

---

August 15, 2016

KYLE NORMAN

Basin Environmental Service

P.O. Box 301

Lovington, NM 88260

RE: EVGSAU 3236-004

Enclosed are the results of analyses for samples received by the laboratory on 08/12/16 11:10.

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Method EPA 524.2	Total Trihalomethanes (TTHM)
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Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

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

Received: 08/12/2016  
 Reported: 08/15/2016  
 Project Name: EVGSAU 3236-004  
 Project Number: NONE GIVEN  
 Project Location: CONOCO PHILLIPS

Sampling Date: 08/10/2016  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Celey D. Keene

**Sample ID: PT. 1 @ 3' (H601799-01)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>128</b>	16.0	08/12/2016	ND	448	112	400	3.64	
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	08/12/2016	ND	197	98.4	200	0.494	
<b>DRO &gt;C10-C28</b>	<b>147</b>	10.0	08/12/2016	ND	197	98.7	200	0.0887	
Surrogate: 1-Chlorooctane	87.3 %	35-147							
Surrogate: 1-Chlorooctadecane	95.0 %	28-171							

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager





---

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---

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A handwritten signature in black ink, appearing to read "Celey D. Keene", is written over a light blue horizontal line.

---

Celey D. Keene, Lab Director/Quality Manager

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603  
(505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325) 673-7020

[illegible]

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

# Appendix C

## Photo Documentation

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



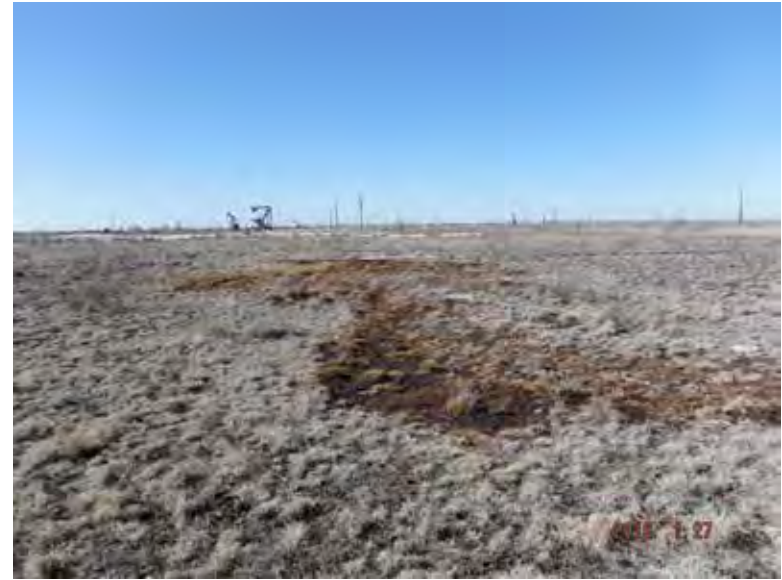
## ConocoPhillips EVGSAU 3236-004

Unit Letter K, Section 32, T17S, R35E



Initial Release, facing NE

1/27/2016



Initial Release, facing SW

1/27/2016



Installing vertical #1, facing W

8/10/2016



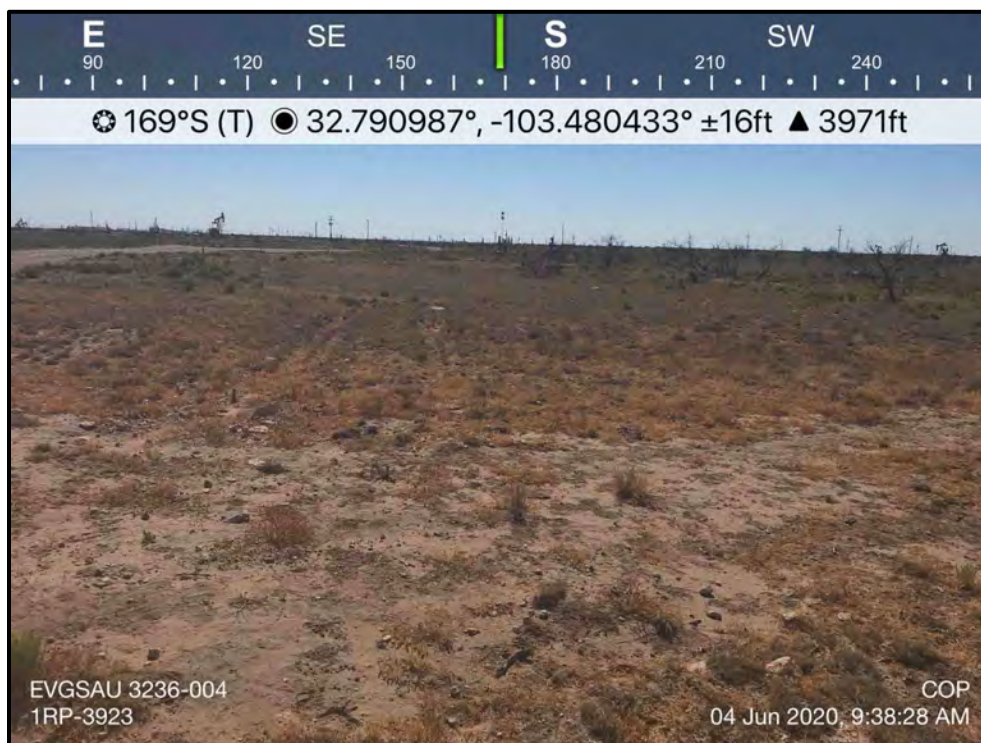
Installing vertical #2, facing S

8/10/2016

**ATTACHMENT D**  
**Photographic Documentation**

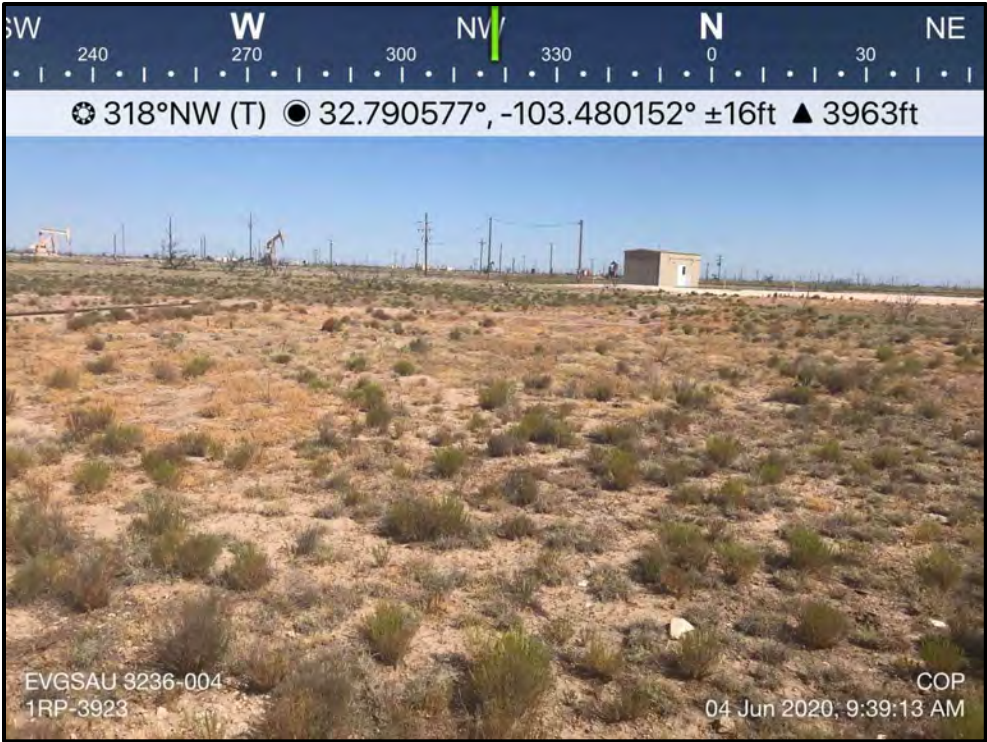


TETRA TECH, INC. PROJECT NO. 212C-MD-02152	DESCRIPTION	View facing southeast of flowline release.	1
	SITE NAME	EVGSAU 3236-004 Flowline Release	6/4/2020

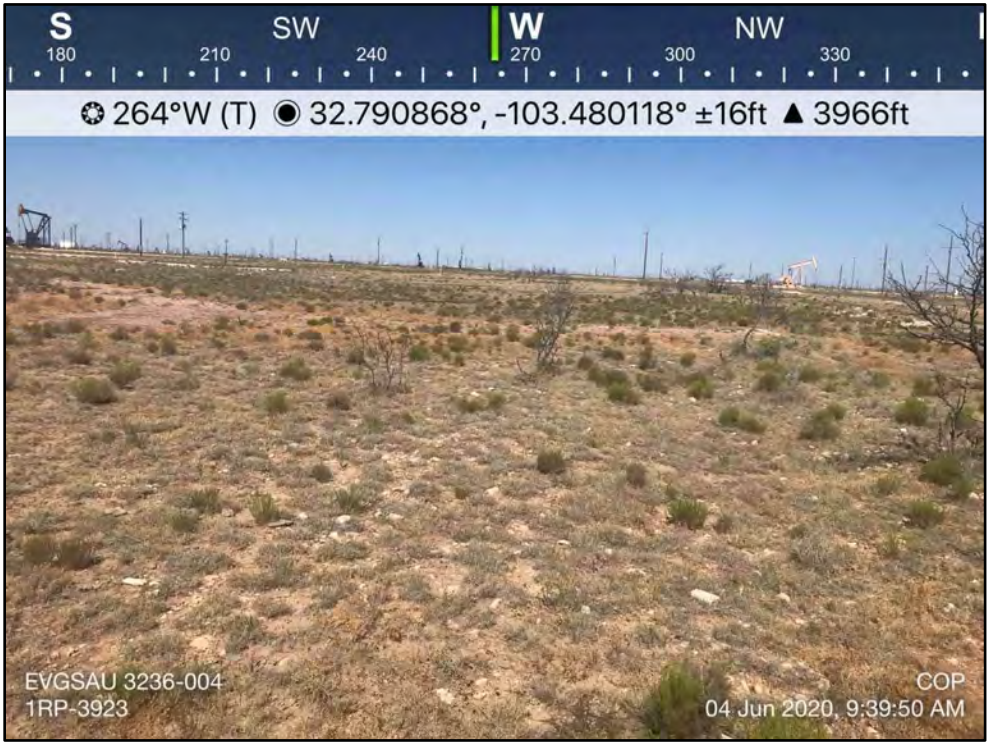


TETRA TECH, INC. PROJECT NO. 212C-MD-02152	DESCRIPTION	View facing southeast of flowline release.	2
	SITE NAME	EVGSAU 3236-004 Flowline Release	6/4/2020





TETRA TECH, INC. PROJECT NO. 212C-MD-02152	DESCRIPTION	View facing northwest of flowline release.	3
	SITE NAME	EVGSAU 3236-004 Flowline Release	6/4/2020



TETRA TECH, INC. PROJECT NO. 212C-MD-02152	DESCRIPTION	View facing west of flowline release.	4
	SITE NAME	EVGSAU 3236-004 Flowline Release	6/4/2020

Sante Fe Main Office  
Phone: (505) 476-3441

General Information  
Phone: (505) 629-6116

Online Phone Directory  
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS

Action 457266

**QUESTIONS**

Operator: Maverick Permian LLC 1000 Main Street, Suite 2900 Houston, TX 77002	OGRID: 331199
	Action Number: 457266
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

**QUESTIONS**

<b>Prerequisites</b>	
Incident ID (n#)	nJXK1528944722
Incident Name	NJXK1528944722 EAST VACUUM (GSA) UNIT #004 @ 30-025-02979
Incident Type	Oil Release
Incident Status	Remediation Plan Approved
Incident Well	[30-025-02979] EAST VACUUM (GSA) UNIT #004

**Location of Release Source**

Please answer all the questions in this group.

Site Name	EAST VACUUM (GSA) UNIT #004
Date Release Discovered	10/15/2015
Surface Owner	State

**Incident Details**

Please answer all the questions in this group.

Incident Type	Oil Release
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

**Nature and Volume of Release**

Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.

Crude Oil Released (bbls) Details	Cause: Equipment Failure   Flow Line - Production   Crude Oil   Released: 10 BBL   Recovered: 4 BBL   Lost: 6 BBL.
Produced Water Released (bbls) Details	Cause: Equipment Failure   Flow Line - Production   Produced Water   Released: 8 BBL   Recovered: 4 BBL   Lost: 4 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.

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QUESTIONS, Page 2

Action 457266

**QUESTIONS (continued)**

Operator: Maverick Permian LLC 1000 Main Street, Suite 2900 Houston, TX 77002	OGRID: 331199
	Action Number: 457266
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

**QUESTIONS**

<b>Nature and Volume of Release (continued)</b>	
Is this a gas only submission (i.e. only significant Mcf values reported)	<b>No, according to supplied volumes this does not appear to be a "gas only" report.</b>
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	<b>No</b>
Reasons why this would be considered a submission for a notification of a major release	<i>Unavailable.</i>
<i>With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.</i>	

**Initial Response**

*The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury.*

The source of the release has been stopped	<b>True</b>
The impacted area has been secured to protect human health and the environment	<b>True</b>
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	<b>True</b>
All free liquids and recoverable materials have been removed and managed appropriately	<b>True</b>
If all the actions described above have not been undertaken, explain why	<i>Not answered.</i>

*Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.*

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.

I hereby agree and sign off to the above statement	Name: Chuck Terhune Title: Program Manager Email: <a href="mailto:chuck.terhune@tetrattech.com">chuck.terhune@tetrattech.com</a> Date: 07/12/2024
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QUESTIONS, Page 3

Action 457266

**QUESTIONS (continued)**

Operator: Maverick Permian LLC 1000 Main Street, Suite 2900 Houston, TX 77002	OGRID: 331199
	Action Number: 457266
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

**QUESTIONS**

<b>Site Characterization</b>	
<i>Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 75 and 100 (ft.)
What method was used to determine the depth to ground water	U.S. Geological Survey
Did this release impact groundwater or surface water	No
<b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>	
A continuously flowing watercourse or any other significant watercourse	Between 1 and 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1000 (ft.) and ½ (mi.)
An occupied permanent residence, school, hospital, institution, or church	Between 1 and 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1 and 5 (mi.)
Any other fresh water well or spring	Between ½ and 1 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Between 1 and 5 (mi.)
A wetland	Between 1000 (ft.) and ½ (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Greater than 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	Yes

<b>Remediation Plan</b>	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No
<b>Soil Contamination Sampling:</b> (Provide the highest observable value for each, in milligrams per kilograms.)	
Chloride (EPA 300.0 or SM4500 Cl B)	464
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	4960
GRO+DRO (EPA SW-846 Method 8015M)	4960
BTEX (EPA SW-846 Method 8021B or 8260B)	0
Benzene (EPA SW-846 Method 8021B or 8260B)	0
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
On what estimated date will the remediation commence	08/01/2025
On what date will (or did) the final sampling or liner inspection occur	08/15/2025
On what date will (or was) the remediation complete(d)	08/31/2025
What is the estimated surface area (in square feet) that will be reclaimed	0
What is the estimated volume (in cubic yards) that will be reclaimed	0
What is the estimated surface area (in square feet) that will be remediated	3023
What is the estimated volume (in cubic yards) that will be remediated	448
<i>These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.</i>	
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 4

Action 457266

**QUESTIONS (continued)**

Operator: Maverick Permian LLC 1000 Main Street, Suite 2900 Houston, TX 77002	OGRID: 331199
	Action Number: 457266
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

**QUESTIONS**

<b>Remediation Plan (continued)</b>	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
<b>This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:</b>	
<i>(Select all answers below that apply.)</i>	
(Ex Situ) Excavation and <b>off-site</b> disposal (i.e. dig and haul, hydrovac, etc.)	Yes
Which OCD approved facility will be used for <b>off-site</b> disposal	HALFWAY DISPOSAL AND LANDFILL [FEEM0112334510]
<b>OR</b> which OCD approved well (API) will be used for <b>off-site</b> disposal	Not answered.
<b>OR</b> is the <b>off-site</b> disposal site, to be used, out-of-state	Not answered.
<b>OR</b> is the <b>off-site</b> disposal site, to be used, an NMED facility	Not answered.
(Ex Situ) Excavation and <b>on-site</b> remediation (i.e. On-Site Land Farms)	Not answered.
(In Situ) Soil Vapor Extraction	Not answered.
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	Not answered.
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	Not answered.
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	Not answered.
Ground Water Abatement pursuant to 19.15.30 NMAC	Not answered.
OTHER (Non-listed remedial process)	Not answered.
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
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.	
I hereby agree and sign off to the above statement	Name: Chuck Terhune Title: Program Manager Email: <a href="mailto:chuck.terhune@tetrattech.com">chuck.terhune@tetrattech.com</a> Date: 04/30/2025
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 5  
  
Action 457266

QUESTIONS (continued)

Operator:  Maverick Permian LLC 1000 Main Street, Suite 2900 Houston, TX 77002	OGRID:  331199
	Action Number:  457266
	Action Type:  [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

Deferral Requests Only	
Only answer the questions in this group if seeking a deferral upon approval this submission. Each of the following items must be confirmed as part of any request for deferral of remediation.	
Requesting a deferral of the remediation closure due date with the approval of this submission	No



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QUESTIONS, Page 6

Action 457266

**QUESTIONS (continued)**

Operator: Maverick Permian LLC 1000 Main Street, Suite 2900 Houston, TX 77002	OGRID: 331199
	Action Number: 457266
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

**QUESTIONS**

Sampling Event Information	
Last sampling notification (C-141N) recorded	355056
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	06/19/2024
What was the (estimated) number of samples that were to be gathered	4
What was the sampling surface area in square feet	800

**Remediation Closure Request**

Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.

Requesting a remediation closure approval with this submission	No
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CONDITIONS

Action 457266

CONDITIONS

Operator: Maverick Permian LLC 1000 Main Street, Suite 2900 Houston, TX 77002	OGRID: 331199
	Action Number: 457266
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

CONDITIONS

Created By	Condition	Condition Date
amaxwell	Remediation work plan approved.	5/5/2025
amaxwell	Variance request to use delineation samples as confirmation samples is approved.	5/5/2025
amaxwell	Submit a report via the OCD permitting portal by August 5, 2025.	5/5/2025