



September 17, 2020

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

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

Mr. Billings:

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

## BACKGROUND

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

## SITE CHARACTERIZATION

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

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

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

**TETRA TECH**

8911 N. Capital of Texas Hwy, Building 2, Suite 2310, Austin, TX, 78759  
Tel 512-338-1667 Fax 512-338-1331 [www.tetrattech.com](http://www.tetrattech.com)

Bradford Billings  
NMOCD  
September 17, 2020

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

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

### REMEDIATION ACTIVITIES

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

### VISUAL SITE INSPECTION

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

A list of field observations describing the Site follow:

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

### CONCLUSION

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

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

Sincerely,



Christian M. Llull  
Project Manager  
Tetra Tech, Inc.

## **FIGURES**



Approximate Release Location

Source: Google Earth Pro, May 2019.



DOCUMENT PATH: D:\CONOCOPHILLIPS\MXD\FIGURE 1 SITE LOCATION\_1RP-2295.MXD



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

CONOCOPHILLIPS

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

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

PROJECT NO.: 212C-MD-02152

DATE: AUGUST 04, 2020

DESIGNED BY: AAM

Figure No.

**1**

**ATTACHMENT A  
C-141 Forms**

District I  
1625 N. French Dr , Hobbs, NM 88240  
District II  
1301 W Grand Avenue, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S St Francis Dr , Santa Fe, NM 87505

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

**RECEIVED**  
SEP 15 2009  
**HOBBSOCD**

Form C-141  
Revised October 10, 2003

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

**Release Notification and Corrective Action**

**OPERATOR**

Initial Report  Final Report

Name of Company <b>ConocoPhillips Company</b>	Contact <b>John W. Gates</b>
Address <b>3300 North A St. Bldg 6, Midland, TX 79705-5406</b>	Telephone No. <b>505.391.3158</b>
Facility Name <b>EVGSAU Satellite # 1 closest well EVGSAU 1910-001</b>	Facility Type <b>Oil and Gas</b>

Surface Owner <b>State Of New Mexico</b>	Mineral Owner <b>State Of New Mexico</b>	Lease No <b>30-025-02824-00-00</b>
--	--	------------------------------------

**LOCATION OF RELEASE**

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

**Latitude Longitude**

**NATURE OF RELEASE**

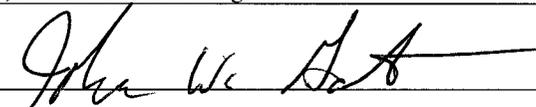
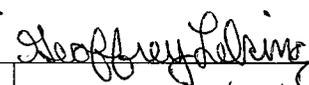
Type of Release <b>Crude Oil &amp; Produced Water</b>	Volume of Release <b>10.6bbl (3oil, 7.6water)</b>	Volume Recovered <b>(3oil, 7water)</b>
Source of Release <b>The release originated from a hole in a 4" elbow on a steel bypass line due to internal/external corrosion.</b>	Date and Hour of Occurrence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

If a Watercourse was Impacted, Describe Fully.\*  
**WATER @ 73'**

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

Describe Area Affected and Cleanup Action Taken.\*  
**The affected area is a 40' X 30' X .5" area of dry hard caliche pad with no livestock present. The spill site will be remediated in accordance with an agreement with NMOCD.**

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

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

**AGRL 0928154673**

**IRP-09.10.2295**

State of New Mexico  
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

## Closure

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

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

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

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

Signature: Charles R. Beauvais II Date: \_\_\_\_\_

email: \_\_\_\_\_ Telephone: \_\_\_\_\_

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

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

Closure Approved by: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

**ATTACHMENT B**  
**NMOSE Site Characterization Data**



# New Mexico Office of the State Engineer Water Column/Average Depth to Water

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

(R=POD has been replaced,  
O=orphaned,  
C=the file is closed) (quarters are 1=NW 2=NE 3=SW 4=SE)  
(quarters are smallest to largest) (NAD83 UTM in meters) (In feet)

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

Average Depth to Water: **77 feet**  
Minimum Depth: **70 feet**  
Maximum Depth: **85 feet**

**Record Count: 3**

**PLSS Search:**

**Section(s): 19**

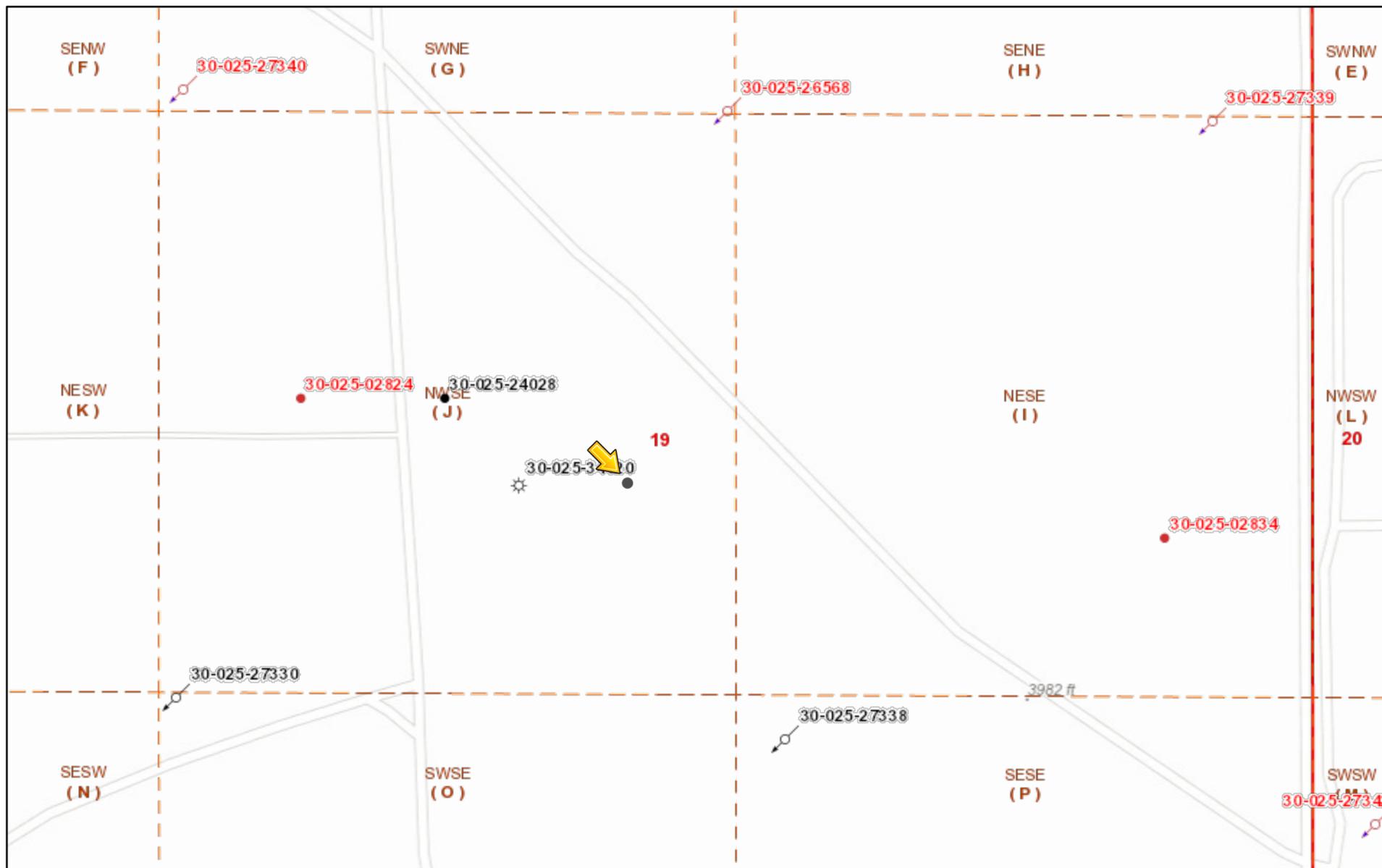
**Township: 17S**

**Range: 35E**

\*UTM location was derived from PLSS - see Help

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

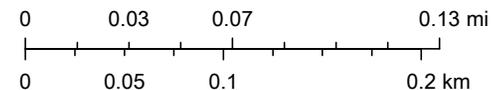
# 1RP-2295



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

1:4,514

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



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

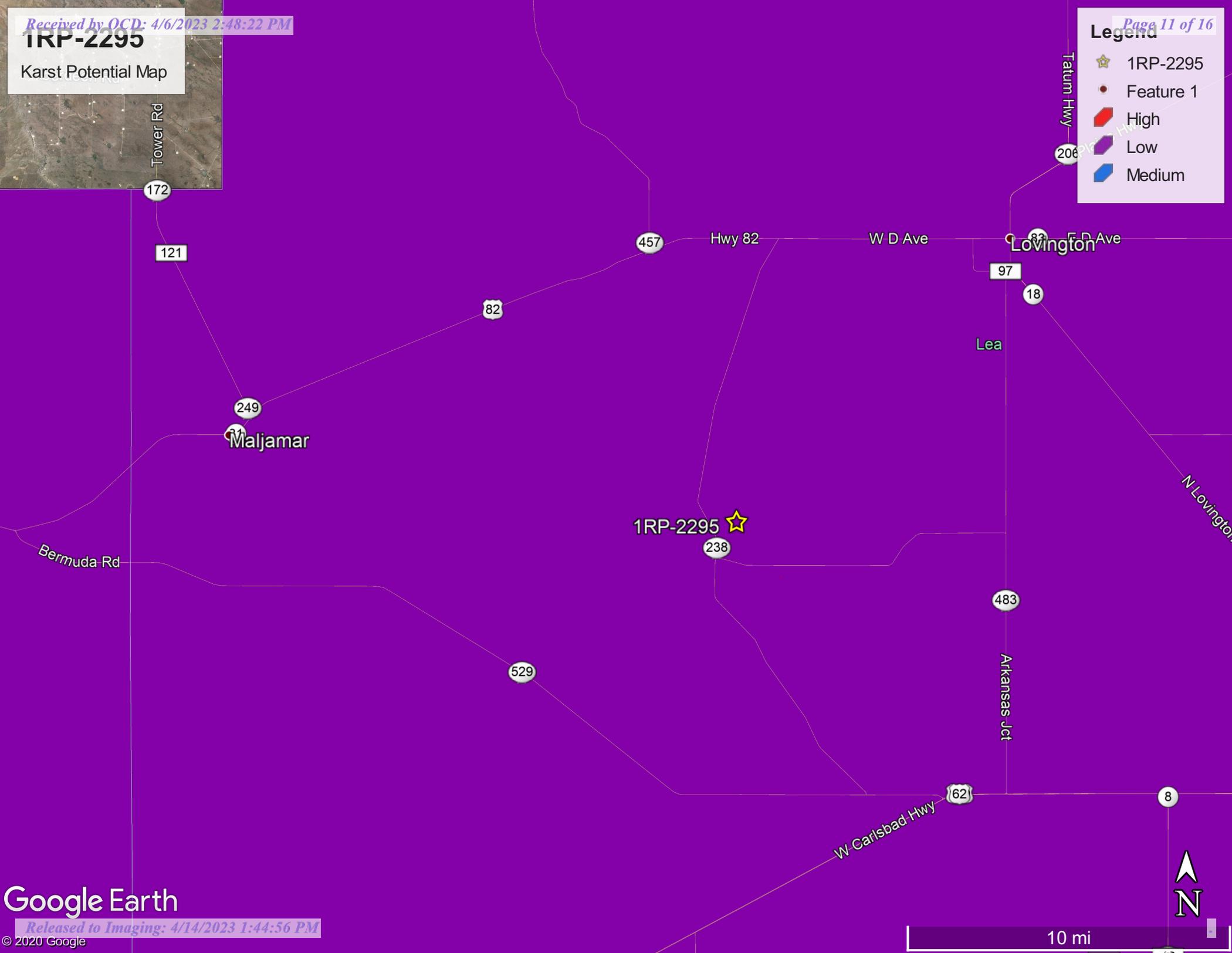
New Mexico Oil Conservation Division

# TRP-2295

Karst Potential Map

**Legend**

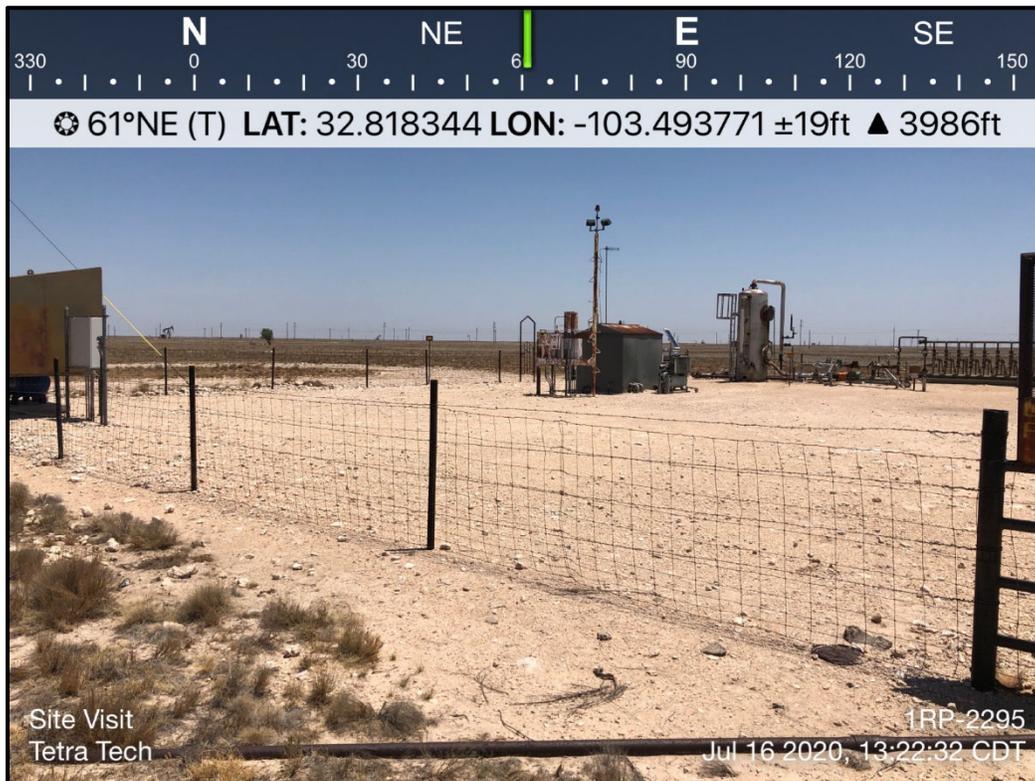
- ☆ 1RP-2295
- Feature 1
- High
- Low
- Medium



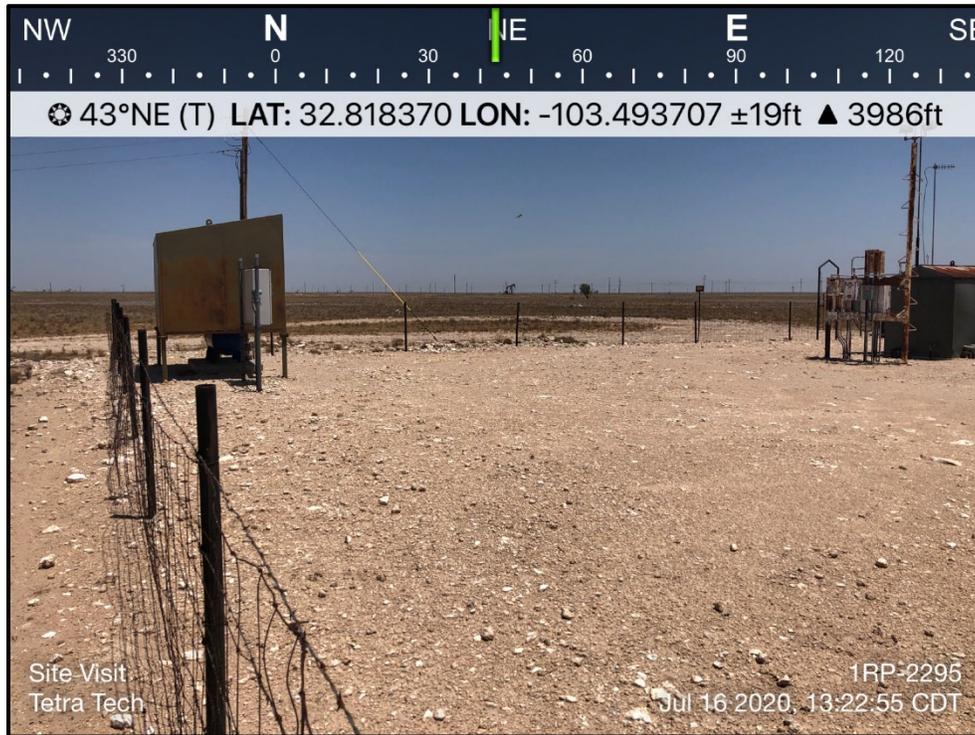
**ATTACHMENT C**  
**Photographic Documentation**



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



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



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



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



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



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

**District I**  
 1625 N. French Dr., Hobbs, NM 88240  
 Phone:(575) 393-6161 Fax:(575) 393-0720

**District II**  
 811 S. First St., Artesia, NM 88210  
 Phone:(575) 748-1283 Fax:(575) 748-9720

**District III**  
 1000 Rio Brazos Rd., Aztec, NM 87410  
 Phone:(505) 334-6178 Fax:(505) 334-6170

**District IV**  
 1220 S. St Francis Dr., Santa Fe, NM 87505  
 Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS

Action 204961

**CONDITIONS**

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

**CONDITIONS**

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