

March 27, 2020

Mr. Brad Billings New Mexico Oil Conservation Division 1220 South St. Francis Drive, Santa Fe, New Mexico 87505



Re: MCA Injection Station #2

C_28_17S_32E

Event Date: May 19, 2008 Lea County, New Mexico Order #: 1RP-1869

Dear Mr. Billings,

This letter provides a summary of the scope, activities and results for the remediation, Reclamation, and Restoration of the site referred to as the MCA Injection Station #2 C_28_17S_32E leak which occurred on May 19, 2008, hereinafter referred to as the "Site".

Desktop Review

- ✓ Spill GPS Location: 32.81191, -103.77408; Sect 28, T 17 S, R 32
- ✓ The original State of New Mexico Oil Conservation District C-141 Spill form for initial reporting of the loss states that 60 barrels of produced water were released, and 8 barrels were recovered. The 52 barrels not recovered effected an area of 1,500 square feet on the pad and 10,000 square feet of pasture. Depth to water is listed at 120 feet. The form states that the site will be remediated in accordance with NMOCD Guidelines. A copy of the C-141 Spill and Closure forms are included in **Attachment A.**
- ✓ The Oil Conservation Division Permitting Spill Search Form states that no waterway was affected, and no groundwater impacted. A copy of the online report is shown in **Attachment B.**
- ✓ A review of past and present aerial photographs shows what appears to be typical vegetation in the release area.

Site Location Map

- ✓ A site location map shows the aerial view with the approximate location of the impacted area based on the C-141 report. The Site Location Map is shown in **Figure 1** below.
- ✓ Review of area photos that pre-date the release and those subsequent to the release date show no difference or impact from this release, nor evidence of remediation.

Site Radius Map

- ✓ A site radius map shows the aerial view within a ½ mile radius of the release point and is shown in **Figure 2** below.
- ✓ Review of aerial photos that pre-date the release and those subsequent to the release date show no impact from this release.



March 27, 2020 Page 1

Aerial TOPO radius view of impacted area

✓ The TOPO radius view does not indicate any water bodies or courses in the ½ mile radius. The TOPO radius map is shown in **Figure 3** below.

New Mexico Site Assessment/Characterization questions from Attachment C, page 3 of new C-141 form

✓ A copy of the results is shown in **Attachment C** below. No water bodies are located within the regulated distances specified on Attachment C of Form C 141. No residences, schools, hospitals, institutions or churches are located within the regulated distance.

Summary of Findings

Initial remediation recovered 8 of the 60 barrels of produced water. Depth to water is listed as 120 feet. No water bodies are located within the regulated distances specified on Attachment C of Form C-141. No residences, schools, hospitals, institutions or churches are located within the regulated distance. Depth to water is reported to be 120 feet deep and aerial photos indicated no impact from the release. Therefore; Apex respectfully recommends a site visit to inspect the current condition of surface soils.

If you have any questions about this letter or require anything further, please feel free to call either of the undersigned at (432) 695-6016.

Sincerely,

Clint Ward Project Manager

Clist Ward

Hank W. McConnell Branch Manager

A. W. Actuelle



Attachments:

- A: Original State of NMOCD C-141 Spill and Closure forms
- B: State of New Mexico Oil Conservation online report
- C: C-141 Page 3 Site Investigation/Characterization

Figures:

- 1. Site Location Map
- 2. Site Radius Map
- 3. TOPO radius Map





Attachment A

Original State of New Mexico Oil Conservation

District C-141 Spill form

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

State of New Mexico Energy Minerals and Natural Resources

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Form C-141 Revised October 10, 2003

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

1220 S. St. Francis Dr., Santa Fe, NM 87505 Santa Fe, NM 87505 **Release Notification and Corrective Action OPERATOR** Initial Report Final Report Name of Company ConocoPhillips Company Contact Mickey Garner Address 3300 North A St. Bldg 6, Midland, TX 79705-5406 Telephone No. 505.391.3158 Facility Name MCA Injection Station #2 Facility Type Oil and Gas WELL 115 4Lease No LC-057210 Mineral Owner BLM Surface Owner BLM 30 025 00734 199 LOCATION OF RELEASE North/South Line East/West Line County Unit Letter Township Feet from the Feet from the Section Range Lea 28 17**S** 32E C WTR (20 Latitude N 32.81191 **Longitude W 103.77408** NATURE OF RELEASE Volume of Release Type of Release Volume Recovered (0oil, 8water) 60bbl (0oil, 60water) **Produced Water** Date and Hour of Occurrence Date and Hour of Discovery Source of Release 05-19-2008 0200 05-19-2008 0730 3" Victaulic coupling If YES, To Whom? Was Immediate Notice Given? Chris Williams Date and Hour 05-19-2008 1450 By Whom? Mickey Garner If YES, Volume Impacting the Watercourse. Was a Watercourse Reached? ☐ Yes ☒ No N/A MAY 2.1.2008 If a Watercourse was Impacted, Describe Fully.* N/A Describe Cause of Problem and Remedial Action Taken.* On Monday May 19, 2008 at 0730 hrs, a leak was discovered coming from a buried 3" discharge line at MCA Station 2, which is located 0.3 miles south of the Maljamar Production Office. The source of discharge was a 3" Victaulic coupling that had failed. Amount spilled was 60 bbls of produced water. CHURDE OF WATER? Describe Area Affected and Cleanup Action Taken.* Upon arrival, the MSO started isolating the line and called a vacuum truck to pick up the free liquids. 8 bbls of produced water was recovered. The spill was not contained an affected approximately 1500 sq ft of prepared location pad and 10,000 sq ft of pasture. The area will be remediated in accordance with 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: Approved by District Supervisor: Chus Welle Printed Name: Mickey Garner Title: HSER Lead Expiration Date: E-mail Address: Mickey.D.Garner@conocophillips.com Conditions of Approval: SUBINIT FULL DELINEATION IRPH Date: 5-20-2008 Phone: 575.391.3158 Attach Additional Sheets If Necessary & WORKERLAN ADR APPROLIME

Page 6 of 15

		 _
Incident ID		
District RP	1RP-1869	
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 its	ems must be included in the closure report.
A scaled site and sampling diagram as described in 19.15.29.1	1 NMAC
Photographs of the remediated site prior to backfill or photos of must be notified 2 days prior to liner inspection)	of the liner integrity if applicable (Note: appropriate OCD District office
Laboratory analyses of final sampling (Note: appropriate ODC	District office must be notified 2 days prior to final sampling)
☐ Description of remediation activities	
and regulations all operators are required to report and/or file certain may endanger public health or the environment. The acceptance of a should their operations have failed to adequately investigate and remuman health or the environment. In addition, OCD acceptance of a compliance with any other federal, state, or local laws and/or regulat restore, reclaim, and re-vegetate the impacted surface area to the con accordance with 19.15.29.13 NMAC including notification to the OC	nediate contamination that pose a threat to groundwater, surface water, C-141 report does not relieve the operator of responsibility for tions. The responsible party acknowledges they must substantially aditions that existed prior to the release or their final land use in CD when reclamation and re-vegetation are complete. Title: Environmental Coordinator
	Telephone: _1-575-745-1959
OCD Only	
Received by:	Date:
	of liability should their operations have failed to adequately investigate and water, human health, or the environment nor does not relieve the responsible or regulations.
Closure Approved by:	Date:
Printed Name:	Title:



Attachment B Original State of New Mexico Oil Conservation Online report

ATTACHMENT B

State of New Mexico Oil Conservation online report

Incident Number	Facility	Facility Name	API	Well	OGRID	Operator Name	Severity	Incident Type	Lease Type	Spill Referrer	Incident Date	Notification Date	Final Report Date	Material Spilled	Volume Spilled
nCOH0815151114			30-025-00734	MCA UNIT #115	5097	CONOCO INC	Major	Produced Water Release		Oil Conservation Division Rep	5/21/2008			Produced Water	60

Volume Recovered	Volume Lost	Unit Of Volume	Spill Cause	Spill Source	District	County	ULSTR	OCD Unit Letter	Section	Township	Range	Latitude	Longitude	Waterway Affected	Ground Water Impact	Ground Water Depth
8	52	BBL	Equipment Failure	Coupling	Hobbs	Lea (25)	C-28-17S-32E	С	28	175	32E	32.8110161	-103.77361	No	No	0



Attachment C

C-141 Page 3, Site Assessment / Characterization



State of New Mexico Oil Conservation Division Form C-141 Page 3

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	(ft bgs)
Did this release impact groundwater or surface water?	☐ Yes ⊠ No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ⊠ No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes ⊠ No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ⊠ No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ⊠ No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ⊠ No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ⊠ No
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ⊠ No
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ⊠ No
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ⊠ No
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ⊠ No
Did the release impact areas not on an exploration, development, production, or storage site?	☐ Yes ⊠ No



Figures

Site Location Map

Site Radius Map

TOPO radius Map







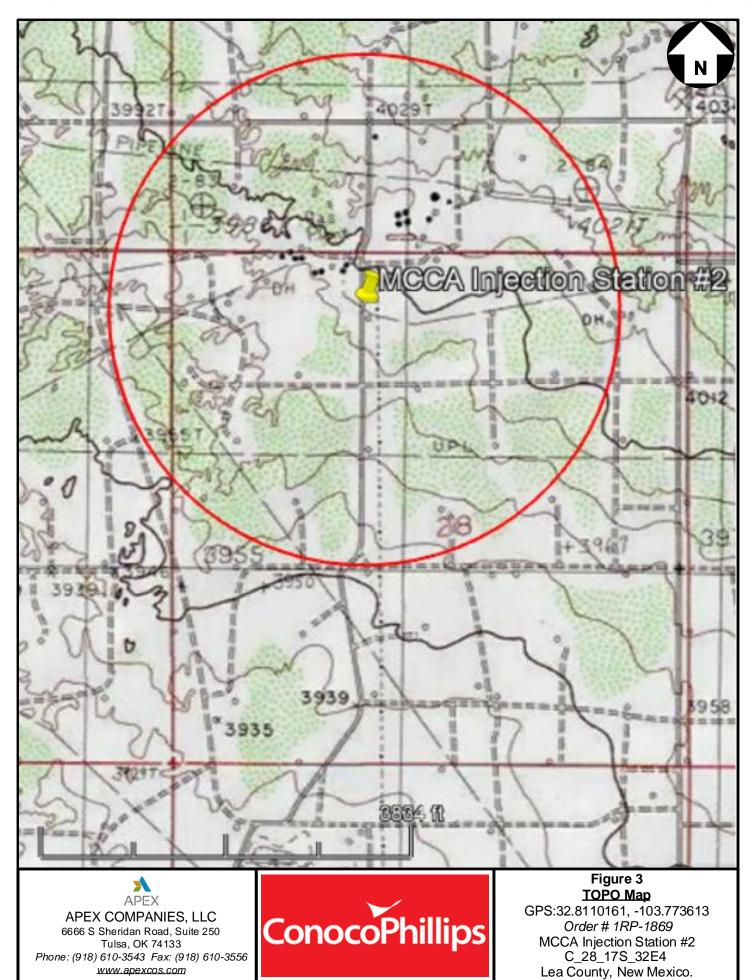
APEX COMPANIES, LLC

6666 S Sheridan Road, Suite 250 Tulsa, OK 74133 Phone: (918) 610-3543 Fax: (918) 610-3556



Figure 2 <u>1/2 Mile Radius Map</u>

GPS:32.8110161, -103.773613 Order # 1RP-1869 MCCA Injection Station #2 C_28_17S_32E4 Lea County, New Mexico.



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

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 209712

CONDITIONS

Operator:	OGRID:
CONOCO INC	5097
10 Desta Dr West	Action Number:
Midland, TX 797059982	209712
	Action Type:
	[IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

Created By	Condition	Condition Date
amaxwell	Report accepted as information only.	4/27/2023
amaxwell	Proceed with site assessment/characterization and remediation/closure per 19.15.29 NMAC.	4/27/2023
amaxwell	Submit a report via the OCD permitting portal by 8/4/2023.	4/27/2023