

April 7, 2023

District Supervisor Oil Conservation Division, District 1 1625 North French Drive Hobbs, New Mexico 88240

#### Re: Liner Inspection and Closure Request ConocoPhillips (Heritage Concho) Airbonita Federal 12 #1H – Tank Battery Release Unit Letter P, Section 12, Township 22 South, Range 32 East Lea County, New Mexico Incident ID# NAPP2303039766

Sir or Madam:

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips to assess a release that occurred from a tank leak at the Tank Battery associated with the Airbonita Federal 12 #1H. The release footprint is located within Public Land Survey System (PLSS) Unit Letter P, Section 12, Township 22 South, Range 32 East, in Lea County, New Mexico (Site). The approximate release point occurred at coordinates 32.399478°, - 103.621377°, as shown on Figures 1 and 2.

### BACKGROUND

According to information provided in the C-141, the release was caused when a tank gasket failed on January 26, 2023. The C-141 stated that the full release extent was noted as on-pad. The provided L48 spill calculator estimates 41.7 bbls released. 38 bbls were recovered out of the 41.7 bbls of PW. A partial release extent was identified based on information provided by ConocoPhillips representatives and review of photographs. Based on provided information, COP personnel went to check the water transfer meter and saw standing fluid in containment. The tank was observed leaking between lid and gasket. From photos, the release footprint appeared to have been contained within the lined containment area. The GPS in the C-141 is inside the containment, south of the battery.

### SITE CHARACTERIZATION

A site characterization was performed and no sinkholes, residences, schools, hospitals, institutions, churches, streams, springs, private domestic water wells, wetlands, incorporated municipal boundaries, subsurface mines, or floodplains are located within the distances specified in 19.15.29 New Mexico Administrative Code (NMAC). The Site is in an area of low karst potential.

According to the New Mexico Office of the State Engineers (NMOSE) reporting system, there are no water wells within ½ mile (800 meters) of the Site. There are two (2) water wells within 2700 meters of the site with an average depth to groundwater of 350 feet below ground surface (bgs). The site characterization data is included in Appendix B.

### **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.

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Based on the relative absence of water wells within ½ mile of the Site, the strictest Table I closure criteria will be applied to this release incident in lieu of drilling a boring for groundwater depth verification. Thus, based on the site characterization, and in accordance with Table I of 19.15.29.12 NMAC, the RRALs for the Site are as follows:

Constituent	Site RRAL
Chloride	600 mg/kg
TPH (GRO+DRO+ORO)	100 mg/kg
BTEX	50 mg/kg
Benzene	10 mg/kg

#### SITE VISIT SUMMARY

Photographs were provided to Tetra Tech by COP personnel prior to the site visit. These photographs indicated the release area footprint to be inside the lined containment area. On February 1, 2023, Tetra Tech personnel were on-Site to assess current site conditions and collect photographs of the release area. These initial February photographs are included in Appendix C.

During the site visit, it was apparent that all free liquids appeared to have been recovered, and the remaining released fluids were held in the base course material within the secondary containment. The secondary containment is made up of earthen berms approximately 2 feet tall with an intact polyethylene liner. As mentioned, the release was reported as having been contained within the lined secondary containment and, as documented in the C-141, initial response efforts were successful in recovering 38 bbls of released fluids. Photographic documentation of site conditions at the time of the site visit is included in Appendix C.

### **REMEDIAL ACTIVITIES**

On March 6, 2023, COP Operations personnel, as a proactive release response, removed impacted gravel within the battery facility, cleaned the exposed liner, and replaced clean base course material. This work was completed prior to the liner inspection could be officially completed by Tetra Tech.

The base course material that was saturated or visibly stained was removed and properly disposed of at an approved facility. Through a scheduling oversight, Tetra Tech personnel were not onsite during this gravel cleanout. However, COP personnel did provide photos of the work, before, during and after completion. Photographic documentation of the February 2023 remedial activities is included in Appendix C.

### LINER INTEGRITY

In accordance with 19.15.29.11(A)(5)(a) NMAC, notification of a liner inspection at the Airbonita Federal 12 #1H – Tank Battery was sent via email to the NMOCD on March 10, 2023. The liner inspection notification email correspondence is included in Appendix D.

On March 15, 2023, Tetra Tech personnel performed an inspection of the liner within the secondary containment of the Airbonita Federal 12 #1H – Tank Battery. Due to the liner being covered with clean material resulting from the previously mentioned February 6 activities, clean base course material was removed by hand in order to expose the polyethylene liner beneath. This work was completed to verify the previous documentation provided by COP. The clean base course/gravel material was carefully extracted from the area surrounding the tanks and the surrounding vicinity. The liner was observed to underlie the release point and tank lid within the secondary containment area. The liner was intact, with no visible rips or tears and encompassed by a 2-foot-tall earthen berm. The liner extended up and over the earthen berm and was anchored on the exterior side. Photographic documentation of the liner inspection is included in Appendix C.

Based on photographs of the release area immediately following the release discovery, the released fluids pooled within the secondary containment allowing substantial recovery of fluids by vacuum truck. The

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standing fluid observed in photographs lends further evidence to the integrity of the liner as a competent fluid barrier.

### CONCLUSION

Based on the results of the liner inspection, ConocoPhillips respectfully requests closure of the subject incident. The release occurred within a lined containment area. The liner integrity demonstration is complete. The affected area of the liner has been visually inspected where the release occurred, and the liner remains intact and had the ability to contain the leak in question. Two business days' notice was provided to the appropriate division district office before conducting the liner inspection.

The final C-141 forms are enclosed in Appendix A. If you have any questions concerning the liner inspection for the Site, please call me at (512) 288-6281.

Sincerely, Tetra Tech, Inc.

Christian M, Llull, P.G Program Manager

CC:

Mr. Charles Beauvais, PBU – ConocoPhillips Mr. Jacob Laird, PBU - ConocoPhillips Liner Inspection and Closure Report April 7, 2023

#### LIST OF ATTACHMENTS

### Figures:

Figure 1 – Overview Map Figure 2 – Topographic Map Figure 3 – Site Feature Map

### Appendices:

Appendix A – C-141 Forms

Appendix B – Site Characterization Data

Appendix C – Photographic Documentation

Appendix D – Regulatory Correspondence

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ConocoPhillips

## FIGURES



Released to Imaging: 5/3/2023 2:44:43 PM



Released to Imaging: 5/3/2023 2:44:43 PM



## APPENDIX A C-141 Forms

State of New Mexico Energy Minerals and Natural Resources Department

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Form C-141 Revised August 24, 2018 Submit to appropriate OCD District office

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Page 10 bf 31

Incident ID	
District RP	
Facility ID	
Application ID	

## **Release Notification**

### **Responsible Party**

Responsible Party	OGRID
Contact Name	Contact Telephone
Contact email	Incident # (assigned by OCD)
Contact mailing address	

### **Location of Release Source**

Longitude

Latitude	

Site Name	Site Type
Date Release Discovered	API# (if applicable)

(NAD 83 in decimal degrees to 5 decimal places)

Unit Letter	Section	Township	Range	County

Surface Owner: State Federal Tribal Private (Name: \_

### Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	Yes No
Condensate	Volume Released (bbls)	Volume Recovered (bbls)
Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)
Cause of Release		
1		

The source of the release has been stopped.

Page 2

	Application ID
Was this a major release as defined by 19.15.29.7(A) NMAC?	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate n	otice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?

Incident ID

District RP Facility ID

### **Initial Response**

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

The impacted area has been secured to protect human health and the environment. Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. All free liquids and recoverable materials have been removed and managed appropriately. If all the actions described above have not been undertaken, explain why: Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation. 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. Title: Printed Name<sup>.</sup> Signature:\_ Partian Espanse Date: email: Telephone:

OCD Only		
	Jocelyn Harimon	01/30/2023
Received by:		Date:

	5.2	32 10	8	15	Spill Calculation - (	On-Pad Surfac	e Pool Spill
Received by OCD: 4/ Convert Irregular shape into a series of rectangles			23 PM Average Depth (in.)	Estimated <u>Pool</u> Area (sq. ft.)	Estimated volume of each pool area (bbl.)	NA Penetration allowance (ft.)	APP2303039766/61 Total Estimated Volume of Spill (bbl.)
Rectangle A	25.00	15.00	3.00	375.00	16.69	0.01	16.90
Rectangle B	40.00	15.00	3.00	600.00	26.70	0.01	27.03
Rectangle C				0.00	0.00	0.00	0.00
Rectangle D				0.00	0.00	0.00	0.00
Rectangle E	1			0.00	0.00	0.00	0.00
Rectangle F				0.00	0.00	0.00	0.00
Rectangle G				0.00	0.00	0.00	0.00
Rectangle H				0.00	0.00	0.00	0.00
Rectangle I				0.00	0.00	0.00	0.00
Rectangle J				0.00	0.00	0.00	0.00
Released to Imaging	: 5/3/20	)23 2:4	4:43 PM	Total	Volume Release, So	ail pot impostod:	41.73
				Total	Volume Release, So	ni not impacted.	41.75

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

Operator:	OGRID:
COG OPERATING LLC	229137
600 W Illinois Ave	Action Number:
Midland, TX 79701	180636
	Action Type:
	[C-141] Release Corrective Action (C-141)
CONDITIONS	

Created By		Condition Date
jharimon	None	1/31/2023

Action 180636

Received by OCD: 4/7/2023 12:52:23 PM Form C-141 State of New Mexico

Oil Conservation Division

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Incident ID	
District RP	
Facility ID	
Application ID	

### 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?					
Did this release impact groundwater or surface water?					
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?					
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?					
Are the lateral extents of the release within a 100-year floodplain?					
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?					

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

#### Characterization Report Checklist: Each of the following items must be included in the report.

Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
Field data
Data table of soil contaminant concentration data
Depth to water determination
Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
Boring or excavation logs
Photographs including date and GIS information
Tonographic/Aerial mans

Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

Oil Conservation Division

Incident ID	NAPP2303039766
District RP	
Facility ID	fAPP2135538959
Application ID	

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### 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 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 R. Beauvais II\_\_\_\_\_\_ Title: \_\_\_Sr. Environmental Engineer \_\_\_\_\_\_ Signature: Charles R. Beauvais 99 Date: 4/6/2023 email: charles.r.beauvais@conocophillips.com Telephone: 575-988-2043 **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: \_\_\_\_\_\_ Date: \_\_\_\_\_\_ Date: \_\_\_\_\_\_\_ Date: \_\_\_\_\_\_\_ Printed Name: Jennifer Nobui Title: \_\_\_\_Environmental Specialist A

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## APPENDIX B 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)	(0	•					2=NE 3 st to lar	3=SW 4= gest)		) AD83 UTM in me	eters)	(	In feet)	
POD Number	POD Sub- Code basin Co	ountv	Q 64 -	_	-	ec.	Tws	Rna		х	Y	Distance	-	-	Water Column
C 02821	C	LE						32E	6273		3584563* 😜	2552	-	340	
C 02096	CUB	ED		2	3	14	22S	32E	6272	04	3584464* 🌍	2681	435	360	75
											Avera	ge Depth to	Water:	350	feet
												Minimum	Depth:	340	feet
												Maximum	Depth:	360	feet
Record Count: 2															

### UTMNAD83 Radius Search (in meters):

Easting (X): 629663.75

Northing (Y): 3585532.37

Radius: 2750

#### \*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.

## **OCD** Potential Karst



3/1/2023, 11:41:35 AM Karst Occurrence Potential Low



BLM, OCD, New Mexico Tech, Esri, HERE, Garmin, Earthstar Geographics

## **OCD** Waterbodies Locations



### 3/1/2023, 11:40:41 AM



OSE Streams





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# APPENDIX C Photographic Documentation



PROJECT NO. 212C-MD-03040	SITE NAME	Airbonita 12 Federal Com #001H Tank Battery Release	1/26/2023
		PROJECT NO. 212C-MD-03040 SITE NAME	





TETRA TECH, INC. PROJECT NO.	DESCRIPTION	View north of pooling through tank battery berm flooring.	5
212C-MD-03040	SITE NAME	Airbonita 12 Federal Com #001H Tank Battery Release	1/26/2023











TETRA TECH, INC. PROJECT NO.	DESCRIPTION	View south-southwest. Exposed liner in the northern portion of the lined secondary containment.	13
212C-MD-03040	SITE NAME	Airbonita 12 Federal Com #001H Tank Battery Release	3/15/2023

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# APPENDIX D Regulatory Correspondence

From:	Enviro, OCD, EMNRD
То:	Llull, Christian; Bratcher, Michael, EMNRD; Nobui, Jennifer, EMNRD
Cc:	Abbott, Sam; Bickerstaff, Colton
Subject:	RE: [EXTERNAL] Incident ID: NAPP2303039766 - Liner Inspection
Date:	Friday, March 10, 2023 4:21:41 PM
Attachments:	image006.ipq         image007.pnq         image008.pnq         image009.pnq         image010.pnq         image011.pnq

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**CAUTION:** This email originated from an external sender. Verify the source before opening links or attachments.

Christian,

Thank you for the notification. Please include a copy of this and all notifications in the remedial and/or closure reports to ensure the notifications are documented in the project file.

JΗ

Jocelyn Harimon • Environmental Specialist Environmental Bureau EMNRD - Oil Conservation Division 1220 South St. Francis Drive | Santa Fe, NM 87505 (505)469-2821 | Jocelyn.Harimon@emnrd.nm.gov http:// www.emnrd.nm.gov

From: Llull, Christian <Christian.Llull@tetratech.com>
Sent: Friday, March 10, 2023 1:37 PM
To: Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>
Cc: Abbott, Sam <Sam.Abbott@tetratech.com>; Bickerstaff, Colton
<Colton.Bickerstaff@tetratech.com>
Subject: [EXTERNAL] Incident ID: NAPP2303039766 - Liner Inspection

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Incident ID (n#) NAPP2303039766 (Airbonita Federal 12 1H - Tank Battery Release)

To whom it may concern,

In accordance with Subsection A of 19.15.29.11 NMAC, the responsible party must verbally notify the appropriate division district office prior to conducting the liner inspection.

Thus, on behalf of ConocoPhillips for the above referenced incident, Tetra Tech is duly providing this communication which serves as notification that a liner inspection will be conducted at this site on March 15, 2023.

**NOTE:** If you have any questions regarding this schedule, please contact me.

#### Christian Llull, P.G. | Program Manager

Direct +1 (512) 338-2861 | Business +1 (512) 338-1667 | Fax +1 (512) 338-1331 | christian.llull@tetratech.com

### Tetra Tech | Leading with $Science^{\mathbb{R}}$ | OGA

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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

Operator:	OGRID:
COG OPERATING LLC	229137
600 W Illinois Ave	Action Number:
Midland, TX 79701	205166
	Action Type:
	[C-141] Release Corrective Action (C-141)
CONDITIONS	

#### Created Condition Condition By Date 5/3/2023 jnobui Closure Report Approved.

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Action 205166