

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

OIL CONS. DIV DIST. 3

Form C-141
Revised August 8, 2011

DEC 30 2015
Submit 1 Copy to appropriate District Office to
accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company Burlington Resources, a Wholly Owned Subsidiary of ConocoPhillips Company	Contact Lisa Hunter
Address 3401 East 30th St, Farmington, NM	Telephone No. (505) 258-1607
Facility Name: San Juan 28-5 Unit 72	Facility Type: Gas Well

Surface Owner Federal	Mineral Owner Federal (SF-079522)	API No. 3003920028
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LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
N	35	28N	05W	1600	South	1500	West	Rio Arriba

05W

Latitude 36.614300 Longitude -107.332371

NATURE OF RELEASE

Type of Release Hydrocarbon – BGT Closure	Volume of Release Unknown	Volume Recovered None
Source of Release Below Grade Tank (BGT)	Date and Hour of Occurrence Unknown	Date and Hour of Discovery October 4, 2010
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom? N/A	
By Whom? N/A	Date and Hour N/A	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. N/A	

If a Watercourse was Impacted, Describe Fully.*
N/A

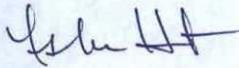
Describe Cause of Problem and Remedial Action Taken.*

Below-Grade Tank Closure activities with samples taken resulting in constituents exceeded standards outlined by 19.15.17.13 NMAC.

Describe Area Affected and Cleanup Action Taken.*

NMOCD action levels for releases are specified in NMOCD's Guidelines for Leaks, Spills and Releases and the release was assigned a ranking score of 20. Samples were collected and analytical results are below applicable NMOCD action levels. No further work will be performed. The final report is attached for review.

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: 	<u>OIL CONSERVATION DIVISION</u>	
Printed Name: Lisa Hunter	Approved by Environmental Specialist: 	
Title: Field Environmental Specialist	Approval Date: 2/8/2016	Expiration Date:
E-mail Address: Lisa.Hunter@cop.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: December 28, 2015 Phone: (505) 258-1607		

* Attach Additional Sheets If Necessary

NUF 1603929025

14



November 8, 2010

Project Number 92115-1453

Ms. Kelsi Harrington
Conoco Phillips
3401 East 30th Street
Farmington, New Mexico 87401

Phone: (505) 599-3403

RE: BELOW-GRADE TANK CLOSURE DOCUMENTATION FOR THE SAN JUAN 28-5 UNIT 72 (hBR) WELL SITE, RIO ARRIBA COUNTY, NEW MEXICO

Dear Ms. Harrington,

Enclosed please find the field notes and analytical results for below-grade tank (BGT) closure activities performed at the San Juan 28-5 Unit 72 (hBr) well site located in Section 35, Township 28 North, Range 5 West, Rio Arriba County, New Mexico. The BGT was removed upon Envirotech personnel's arrival on October 4, 2010. Once the BGT was removed, one (1) five (5)-point composite sample was collected from beneath the former BGT. The sample was analyzed in the field for total petroleum hydrocarbons (TPH) using USEPA Method 418.1, screened for organic vapors using a photoionization detector (PID) and for chlorides. Additionally, the sample was placed into a four (4)-ounce glass jar, capped headspace free, and transported on ice, under chain of custody, to Envirotech's Analytical Laboratory to be analyzed for TPH using USEPA Method 8015, for benzene and BTEX using USEPA Method 8021 and for total chlorides using USEPA Method 4500. The sample returned results below the regulatory standards for benzene, BTEX and chlorides but above the regulatory standard of 100 parts per million (ppm) TPH using USEPA Method 418.1, confirming a release did occur.

A brief site assessment was conducted and the regulatory standards were determined to be 100 ppm TPH and 100 ppm organic vapors due to horizontal distance to surface water being less than 200 feet and depth to groundwater between 50 and 100 feet, pursuant to New Mexico Oil Conservation Division (NMOCD) Guidelines for Remediation of Spills, Leaks, and Releases. The sample from beneath the former BGT returned results below the regulatory standards for TPH using USEPA Method 8015; see attached *Analytical Results*. Envirotech, Inc. recommends no further action in regards to this incident.

ConocoPhillips
San Juan 28-5 #72 (hBr)
BGT Closure Sampling
Project Number 92115-1453
Page 2

We appreciate the opportunity to be of service. If you have any questions or require additional information, please contact our office at (505) 632-0615.

Respectfully submitted,
ENVIROTECH, INC.



Sarah Rowland, EIT
Staff Engineer
srowland@envirotech-inc.com

Enclosures: Analytical Results
Field Notes

Cc: Client File 92115

PAGE NO: <u>1</u> OF <u>2</u> <u>92115-1453</u>	ENVIROTECH INC ENVIRONMENTAL SCIENTISTS & ENGINEERS 5796 U.S. HIGHWAY 64 - 3014 FARMINGTON, NEW MEXICO 87401 PHONE: (505) 632-0615	ENVIRONMENTAL SPECIALIST: <u>S. Rowland</u>
DATE STARTED: <u>10/4/10</u>		LAT:
DATE FINISHED: <u>10/2/10</u>		LONG:

FIELD REPORT: BGT / PIT CLOSURE VERIFICATION

LOCATION: NAME: San Juan 28-5 WELL #: 72 TEMP PIT: PERMANENT PIT: BGT: X
 LEGAL ADD: UNIT: N SEC: 35 TWP: 28N RNG: 5W PM: NM
 QTR/FOOTAGE: 1500 FWL 1000 FSL CNTY: RA ST: NM

EXCAVATION APPROX: 14 FT. X 14 FT. X 5 FT. DEEP CUBIC YARDAGE:
 DISPOSAL FACILITY: REMEDIATION METHOD:
 LAND OWNER: API: BGT / PIT VOLUME: 120 bbls
 CONSTRUCTION MATERIAL: Steel DOUBLE-WALLED, WITH LEAK DETECTION: Cribbing lined

LOCATION APPROXIMATELY: 35 FT. 45° FROM WELLHEAD
 DEPTH TO GROUNDWATER: 80' by cathodic

TEMPORARY PIT - GROUNDWATER 50-100 FEET DEEP
 BENZENE ≤ 0.2 mg/kg, BTEX ≤ 50 mg/kg, GRO & DRO FRACTION (8015) ≤ 500 mg/kg, TPH (418.1) ≤ 2500 mg/kg, CHLORIDES ≤ 500 mg/kg

TEMPORARY PIT - GROUNDWATER ≥ 100 FEET DEEP
 BENZENE ≤ 0.2 mg/kg, BTEX ≤ 50 mg/kg, GRO & DRO FRACTION (8015) ≤ 500 mg/kg, TPH (418.1) ≤ 2500 mg/kg, CHLORIDES ≤ 1000 mg/kg

X PERMANENT PIT OR BGT
 BENZENE ≤ 0.2 mg/kg, BTEX ≤ 50 mg/kg, TPH (418.1) ≤ 100 mg/kg, CHLORIDES ≤ 250 mg/kg

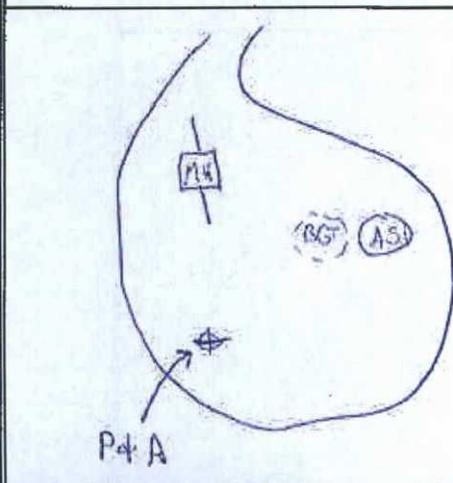
FIELD 418.1 ANALYSIS

TIME	SAMPLE I.D.	LAB NO.	WEIGHT (g)	mL FREON	DILUTION	READING	CALC. (mg/kg)
11:15	200STD					200	
11:45	BGT COMP	1	<u>5</u>	<u>20</u>	<u>4</u>	<u>222</u>	<u>888</u>
12:00	2 below BGT	2					
		3					
		4					
		5					
		6					

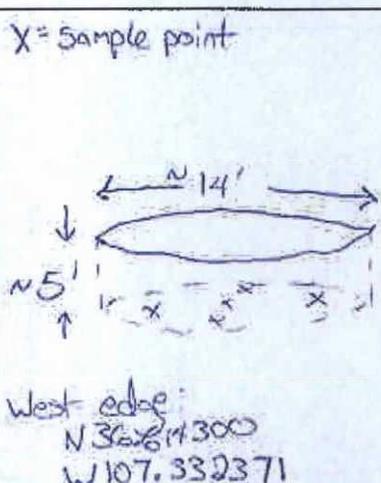
PERIMETER

FIELD CHLORIDES RESULTS

PROFILE



SAMPLE ID	READING	CALC. (mg/kg)
1	<u>0.6</u>	<u><33</u>



LAB SAMPLES		
SAMPLE ID	ANALYSIS	RESULTS
	BENZENE	
	BTEX	
	GRO & DRO	
	CHLORIDES	
<u>2</u>	<u>hold for 1 result</u>	

NOTES: 150' to SW
Kelly oil field, removed BGT on arrival
Talked to Kelsi.
Took sample from ~2' below bottom of BGT in center
to hold in case sample 1 is >100 ppm TPH.

WORKORDER # _____ WHO ORDERED _____



**EPA METHOD 418.1
TOTAL PETROLEUM
HYDROCARBONS**

Client:	ConocoPhillips	Project #:	92115-1453
Sample No.:	1	Date Reported:	10/8/2010
Sample ID:	BGT Composite	Date Sampled:	10/4/2010
Sample Matrix:	Soil	Date Analyzed:	10/4/2010
Preservative:	Cool	Analysis Needed:	TPH-418.1
Condition:	Cool and Intact		

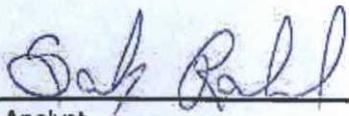
Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
Total Petroleum Hydrocarbons	888	5.0

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: **San Juan 28-5 Unit 72 (hBr)**

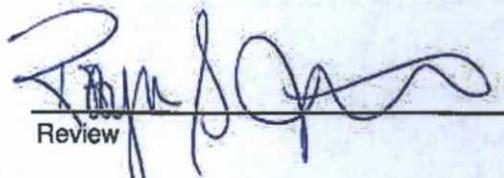
Instrument calibrated to 200 ppm standard. Zeroed before each sample



Analyst

Sarah Rowland, EIT

Printed



Review

Robyn Jones, EIT

Printed

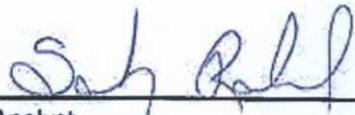


CONTINUOUS CALIBRATION
EPA METHOD 418.1
TOTAL PETROLEUM
HYDROCARBONS

Cal. Date: 4-Oct-10

Parameter	Standard Concentration mg/L	Concentration Reading mg/L
TPH	100	200
	200	
	500	
	1000	

The accepted percent relative deviation (%RSD) of the calibration factor is less than 20% over the working range.

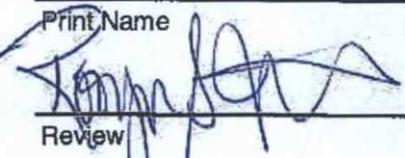


Analyst

Date 10/8/2010

Sarah Rowland, EIT

Print Name



Review

Date 10/8/2010

Robyn Jones, EIT

Print Name



Field Chloride

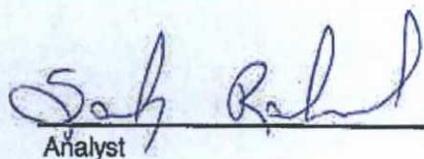
Client: ConocoPhillips Project #: 92115-1453
Sample No.: 1 Date Reported: 10/8/2010
Sample ID: BGT Composite Date Sampled: 10/4/2010
Sample Matrix: Soil Date Analyzed: 10/4/2010
Preservative: Cool Analysis Needed: Chloride
Condition: Cool and Intact

Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
Field Chloride	ND	33.0

ND = Parameter not detected at the stated detection limit.

References: "Standard Methods for the Examination of Water and Wastewater", 18th ed., 1992
Hach Company Quantab Titrators for Chloride

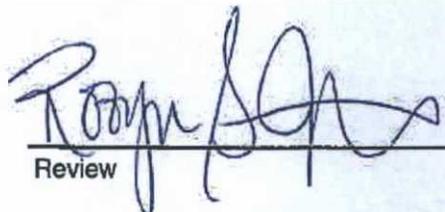
Comments: San Juan 28-5 Unit 72 (hBr)



Analyst

Sarah Rowland, EIT

Printed



Review

Robyn Jones, EIT

Printed

**EPA METHOD 8015 Modified
Nonhalogenated Volatile Organics
Total Petroleum Hydrocarbons**

Client:	ConocoPhillips	Project #:	92115-1453
Sample ID:	BGT Composite	Date Reported:	10-05-10
Laboratory Number:	56050	Date Sampled:	10-04-10
Chain of Custody No:	10446	Date Received:	10-04-10
Sample Matrix:	Soil	Date Extracted:	10-04-10
Preservative:	Cool	Date Analyzed:	10-05-10
Condition:	Intact	Analysis Requested:	8015 TPH

Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	ND	0.2
Diesel Range (C10 - C28)	33.4	0.1
Total Petroleum Hydrocarbons	33.4	

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: **San Juan 28-5 #72 (hBr)**



Analyst



Review



**EPA Method 8015 Modified
Nonhalogenated Volatile Organics
Total Petroleum Hydrocarbons**

Quality Assurance Report

Client:	QA/QC	Project #:	N/A
Sample ID:	10-05-10 QA/QC	Date Reported:	10-05-10
Laboratory Number:	56040	Date Sampled:	N/A
Sample Matrix:	Methylene Chloride	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	10-05-10
Condition:	N/A	Analysis Requested:	TPH

	I-Cal Date	I-Cal RF:	C-Cal RF:	% Difference	Accept. Range:
Gasoline Range C5 - C10	10-05-10	9.9960E+002	1.0000E+003	0.04%	0 - 15%
Diesel Range C10 - C28	10-05-10	9.9960E+002	1.0000E+003	0.04%	0 - 15%

Blank Conc. (mg/L - mg/Kg)	Concentration	Detection Limit
Gasoline Range C5 - C10	ND	0.2
Diesel Range C10 - C28	ND	0.1
Total Petroleum Hydrocarbons	ND	

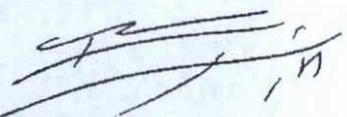
Duplicate Conc. (mg/Kg)	Sample	Duplicate	% Difference	Accept. Range
Gasoline Range C5 - C10	4.1	4.2	2.4%	0 - 30%
Diesel Range C10 - C28	5.6	5.3	5.4%	0 - 30%

Spike Conc. (mg/Kg)	Sample	Spike Added	Spike Result	% Recovery	Accept. Range
Gasoline Range C5 - C10	4.1	250	257	101%	75 - 125%
Diesel Range C10 - C28	5.6	250	256	100%	75 - 125%

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: QA/QC for Samples 56040-56045, 56047-56050



Analyst



Review

Client:	ConocoPhillips	Project #:	92115-1453
Sample ID:	BGT Composite	Date Reported:	10-05-10
Laboratory Number:	56050	Date Sampled:	10-04-10
Chain of Custody:	10446	Date Received:	10-04-10
Sample Matrix:	Soil	Date Analyzed:	10-05-10
Preservative:	Cool	Date Extracted:	10-04-10
Condition:	Intact	Analysis Requested:	BTEX
		Dilution:	10

Parameter	Concentration (ug/Kg)	Det. Limit (ug/Kg)
Benzene	2.8	0.9
Toluene	174	1.0
Ethylbenzene	44.8	1.0
p,m-Xylene	1,100	1.2
o-Xylene	137	0.9
Total BTEX	1,460	

ND - Parameter not detected at the stated detection limit.

Surrogate Recoveries:	Parameter	Percent Recovery
	Fluorobenzene	107 %
	1,4-difluorobenzene	104 %
	Bromochlorobenzene	105 %

References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Method 8021B, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: **San Juan 28-5 #72 (hBr)**



Analyst



Review

Client:	N/A	Project #:	N/A
Sample ID:	1005BBLK QA/QC	Date Reported:	10-05-10
Laboratory Number:	56046	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	10-05-10
Condition:	N/A	Analysis:	BTEX
		Dilution:	10

Calibration and Detection Limits (ug/L)	I-Cal RF:	C-Cal RF:	%Diff:	Blank Conc:	Detect. Limit:
		Accept. Range 0 - 15%			
Benzene	3.0355E+006	3.0416E+006	0.2%	ND	0.1
Toluene	9.3509E+005	9.3697E+005	0.2%	ND	0.1
Ethylbenzene	7.8633E+005	7.8791E+005	0.2%	ND	0.1
p,m-Xylene	1.6714E+006	1.6748E+006	0.2%	ND	0.1
o-Xylene	6.3627E+005	6.3755E+005	0.2%	ND	0.1

Duplicate Conc. (ug/Kg)	Sample	Duplicate	%Diff:	Accept. Range	Detect. Limit
Benzene	ND	ND	0.0%	0 - 30%	0.9
Toluene	ND	ND	0.0%	0 - 30%	1.0
Ethylbenzene	ND	ND	0.0%	0 - 30%	1.0
p,m-Xylene	ND	ND	0.0%	0 - 30%	1.2
o-Xylene	ND	ND	0.0%	0 - 30%	0.9

Spike Conc. (ug/Kg)	Sample	Amount Spiked	Spiked Sample	% Recovery	Accept Range
Benzene	ND	500	501	100%	39 - 150
Toluene	ND	500	501	100%	46 - 148
Ethylbenzene	ND	500	507	101%	32 - 160
p,m-Xylene	ND	1000	1,010	101%	46 - 148
o-Xylene	ND	500	502	100%	46 - 148

ND - Parameter not detected at the stated detection limit.

Dilution: Spike and spiked sample concentration represent a dilution proportional to sample dilution.

References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.
Method 8021B, Aromatic and Halogenated Volatiles by Gas Chromatography Using Photoionization and/or Electrolytic Conductivity Detectors, SW-846, USEPA December 1996.

Comments: QA/QC for Samples 56046-56047, 56050



Analyst



Review



Client:	ConocoPhillips	Project #:	92115-1453
Sample ID:	BGT Composite	Date Reported:	10-05-10
Lab ID#:	56050	Date Sampled:	10-04-10
Sample Matrix:	Soil	Date Received:	10-04-10
Preservative:	Cool	Date Analyzed:	10-05-10
Condition:	Intact	Chain of Custody:	10446

Parameter	Concentration (mg/Kg)
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Total Chloride	10
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Reference: U.S.E.P.A., 4500B, "Methods for Chemical Analysis of Water and Wastes", 1983.
Standard Methods For The Examination of Water And Waste Water", 18th ed., 1992.

Comments: **San Juan 28-5 #72 (hBr)**

Analyst

Review

KUSH

CHAIN OF CUSTODY RECORD

10446

Client: CONOCOPHILLIPS		Project Name / Location: SAN JUAN 28-5 #72 (hBr)		ANALYSIS / PARAMETERS															
Client Address:		Sampler Name: SARAH ROWLAND TONI McNEIGHT		TPH (Method 8015) *	BTEX (Method 8021) *	VOC (Method 8260)	RCRA 8 Metals	Cation / Anion	RCI	TCLP with H/P	PAH	TPH (418.1)	CHLORIDE *					Sample Cool	Sample Intact
Client Phone No.:		Client No.: 92115-1453																	

Sample No./ Identification	Sample Date	Sample Time	Lab No.	Sample Matrix	No./Volume of Containers	Preservative			TPH (Method 8015)	BTEX (Method 8021)	VOC (Method 8260)	RCRA 8 Metals	Cation / Anion	RCI	TCLP with H/P	PAH	TPH (418.1)	CHLORIDE			Sample Cool	Sample Intact
						HgCl ₂	HCl	30%														
BGT composite	10/4/10	12:00	J6050	Soil Solid	1/402				✓	✓								✓			Y	Y
				Soil Solid	Sludge Aqueous																	
				Soil Solid	Sludge Aqueous																	
				Soil Solid	Sludge Aqueous																	
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				Soil Solid	Sludge Aqueous																	

Relinquished by: (Signature) <i>Toni McNeight</i>	Date 10/4/10	Time 13:50	Received by: (Signature) <i>Julius Patten</i>	Date 10.4.10	Time 13:50
Relinquished by: (Signature)			Received by: (Signature)		
Relinquished by: (Signature)			Received by: (Signature)		



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