RECEIVED
By OCD District 1 at 8:35 am, Jul 28, 2015

APPROVED
By OCD District 1 at 8:35 am, Jul 28, 2015

ConocoPhillips

CONOCOPHILLIPS

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

EVGSAU 3127-398

(1RP-3235)

Corrective Action Plan

API No. 30-025-34835

Release Date: August 12th, 2014

Unit Letter J, Section 31, Township 17S, Range 35E

PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

July 27, 2015

Kellie Jones
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 3127-398 (1RP-3235)
UL/J sec. 31 T17S R35E
API No. 30-025-34835

Ms. Jones:

ConocoPhillips (CoP) has retained Basin Environmental Service Technologies (Basin) to address potential environmental concerns at the above-referenced site.

Background and Previous Work

The site is located approximately 1.1 miles southeast of Buckeye, New Mexico at UL/J sec. 31 T17S R35E. NM OSE, BLM and Basin installed monitor well records indicate that groundwater will likely be encountered at a depth of approximately 109 +/- feet.

On August 12th, 2014, CoP discovered that a 2 inch fiberglass injection line had ruptured, releasing 8.26 barrels of produced water over 2,264 sq ft of pasture. None of this fluid was recovered. NMOCD was notified of the release on August 13th, 2014, and an initial C-141 was submitted to NMOCD for approval. NMOCD approved the C-141 on August 13th, 2014 (Appendix A).

Basin personnel were on site to assess the release on June 26th, 2015. The release was mapped and photographed (Appendix B). On July 15th, 2015, the release was sampled at the surface and with depth. Representative samples were sent to a commercial laboratory for analysis. Laboratory analysis for Point 1 returned elevated chloride concentrations 4,160 mg/kg at the surface and 1,070 mg/kg at 1 ft bgs. Gasoline Range Organics (GRO) and Diesel Range Organics (DRO) both returned values of non-detect. Laboratory analysis of Points 2 and 3 revealed chloride, GRO and DRO values of non-detect at the surface and at 6 in bgs (Appendix C).

Based on this assessment, the release area around Point 1will be excavated to 2 ft bgs (Figure 1). Once the excavation is complete, discreet bottom samples will be taken and field tested for chlorides and organic vapors. If the field data indicates that the samples will not achieve

chloride, GRO and DRO readings below regulatory standards, the excavation will be deepened until field testing indicates that all constituents from the bottom samples will return values below regulatory standards. The discreet bottom samples will then be taken to a commercial laboratory to confirm that chloride, GRO and DRO readings are below regulatory standards.

All excavated soils will be taken to a NMOCD approved facility for disposal. Clean soil will be imported to the site to use as backfill. A sample of the imported soil will be taken to a commercial laboratory to confirm that the chloride reading is below regulatory standards. The excavation will be backfilled with the clean, imported soil. Once the backfill is complete, the backfilled excavation, as well as the area around Points 2 and 3, will be seeded with a blend of native vegetation.

Once these activities have been completed, a report will be sent to NMOCD requesting 'remediation termination' and site closure.

Basin appreciates the opportunity to work with you on this project. Please call Hack Conder at (575) 393-2967 or 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 – Photo Documentation
- Appendix C – Laboratory Analysis

Figures

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

Proposed Excavation

Point 1

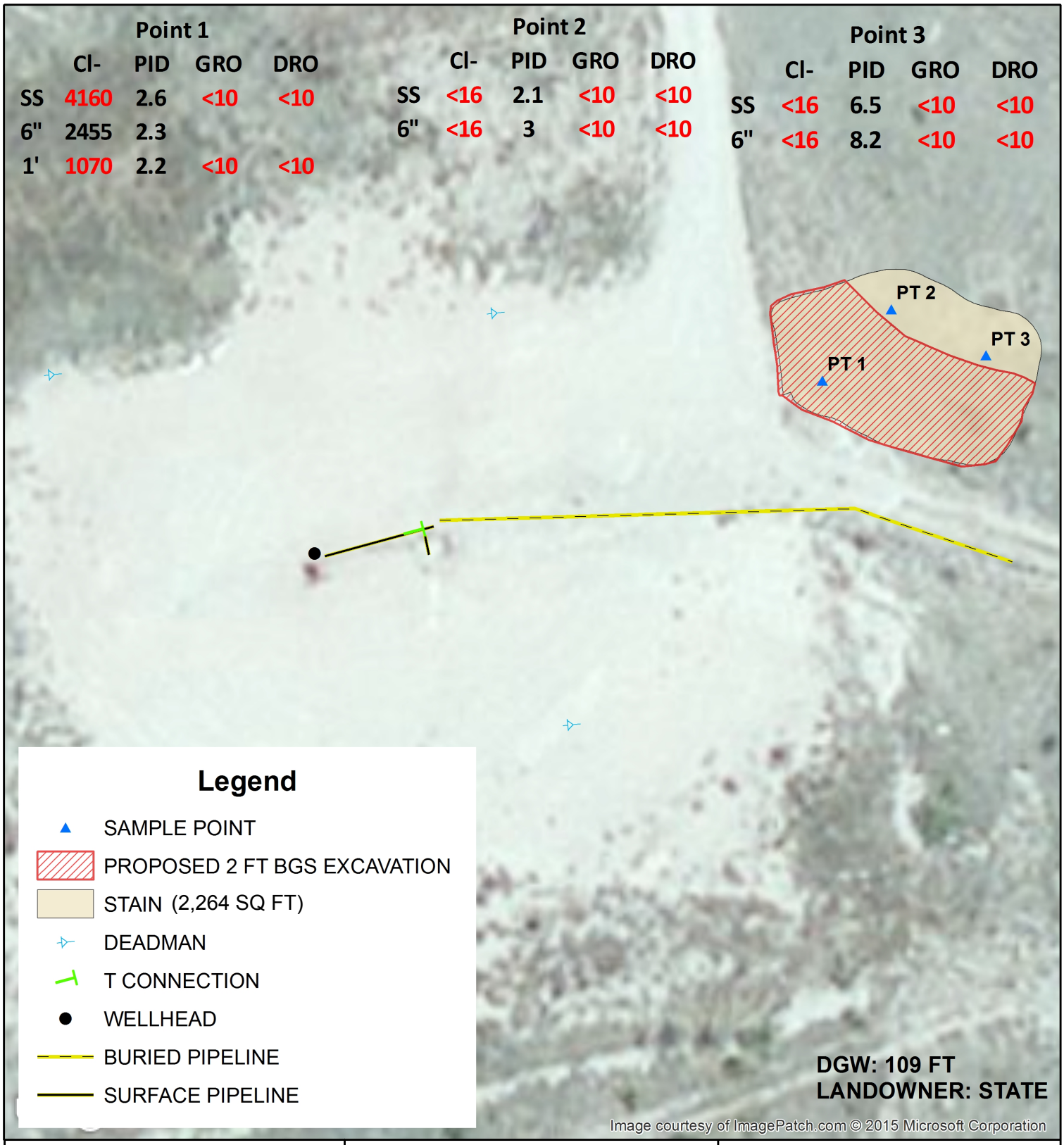
	Cl-	PID	GRO	DRO
SS	4160	2.6	<10	<10
6"	2455	2.3		
1'	1070	2.2	<10	<10

Point 2

	Cl-	PID	GRO	DRO
SS	<16	2.1	<10	<10
6"	<16	3	<10	<10

Point 3

	Cl-	PID	GRO	DRO
SS	<16	6.5	<10	<10
6"	<16	8.2	<10	<10



Basin Environmental Service Technologies
Effective Solutions

CONOCOPHILLIPS
EVGSAU 3127-398
1RP-3235
Legals: UL/J sec. 31
T-17-S R-35-E
LEA COUNTY, NM

Figure 1

GPS: 32.788178, -103.495021

0 25 50 Feet

GPS date: 6/26/15 CF
Drawing date: 7/22/15
Drafted by: C. Ursanic

N W E S

Appendix A
Intial C-141

Basin Environmental Service Technologies
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: **ConocoPhillips**	Contact: **Spencer Cluff**
Address: **29 Vacuum Complex Lane**	Telephone No. **575-391-3143**
Facility Name: **EVGSAU 3127-398**	Facility Type: **Flow Line**

Surface Owner: NMOCD	Mineral Owner NMOCD	API No. 3002534835

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
J	31	17S	35E	1415	South	2140	East	**LEA**

Latitude 32.7881322662248 Longitude - 103.495437112899

NATURE OF RELEASE

Type of Release: **Spill**	Volume of Release: 8.26 BBLS	Volume Recovered: 0 BBLS
Source of Release: 2" fiber glass injection line	Date and Hour of Occurrence **08/12/14 2:00 pm**	Date and Hour of Discovery **08/13/2014 7:00 am**
Was Immediate Notice Given? ☒ Yes ☐ No ☐ Not Required	If YES, To Whom? **Tomas Oberding**	
By Whom? **Spencer Cluff**	Date and Hour: **08/13/2014 2:05 pm**	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

HOBBS OCD
AUG 13 2014
RECEIVED

Describe Cause of Problem and Remedial Action Taken.*

On Tuesday, Aug.12, 2014 at1400 hrs. MST, a discharge of 8.26 BPW occurred at EVGSAU 3127-398. While checking wells, MSO discovered a 2" fiberglass injection line had ruptured. MSO shut in the line and submitted a work order to repair the line. The spill area is 129 ft. X 69 ft. X 1 inch deep, resulting in 8.26 BPW, all in pasture, with non-recovered. The spill area will be remediated according to NMOCD guidelines.

Describe Area Affected and Cleanup Action Taken.*

MSO shut in the line and submitted a work order to repair the line. The spill area is 129 ft. X 69 ft. X 1 inch deep, resulting in 8.26 BPW, all in pasture, with non-recovered. The spill 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.

Signature: *Spencer A. Cluff*

Printed Name: Spencer Cluff

Title: HSE Lead

E-mail Address: ***spencer.a.cluff@conocophillips.com***

Date: 08/13/2014 Phone:575-391-3143

OIL CONSERVATION DIVISION

Approved by Environmental Specialist:

Approval Date: 8-13-14 Expiration Date: 10-15-14

Conditions of Approval:
Site Supervisor
Delineate & remediate area as per NMOCD guides.
Submit final C-141 by 10-15-14

Attached ☐

IRP-3235

ogrid 217817
AFE 1422 557350
AFE 1422 557501

AUG 14 2014

* Attach Additional Sheets If Necessary

Appendix B
Photo Documentation

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

ConocoPhillips EVGSAU 3127-398

Unit Letter J, Section 31, T17S, R35E

Initial release area, facing southeast 6/26/15

Initial release area, facing northwest 6/26/15

Initial release area, facing southeast 6/26/15

Appendix C
Laboratory Analysis

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

CARDINAL Laboratories

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

July 20, 2015

KYLE NORMAN

BASIN ENVIRONMENTAL - HOBBS

419 W. CAIN

HOBBS, NM 88240

RE: EVGSAU 3127-398

Enclosed are the results of analyses for samples received by the laboratory on 07/17/15 11:42.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. 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.

Cardinal Laboratories is accreditated 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,

Celey D. Keene

Celey D. Keene

Lab Director/Quality Manager

CARDINAL Laboratories

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

Analytical Results For:

BASIN ENVIRONMENTAL - HOBBS
KYLE NORMAN
419 W. CAIN
HOBBS NM, 88240
Fax To: (575) 393-0293

Received:	07/17/2015	Sampling Date:	07/15/2015
Reported:	07/20/2015	Sampling Type:	Soil
Project Name:	EVGSAU 3127-398	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Judy Garcia
Project Location:	NOT GIVEN		

Sample ID: POINT 1 @ SURFACE (H501850-01)

Chloride, SM4500Cl-B mg/kg **Analyzed By: AP**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**4160**	16.0	07/20/2015	ND	416	104	400	7.41	

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	07/17/2015	ND	179	89.5	200	12.7	
DRO >C10-C28	<10.0	10.0	07/17/2015	ND	161	80.7	200	16.2	

Surrogate: 1-Chlorooctane	*91.6 %*	*47.2-157*
Surrogate: 1-Chlorooctadecane	*97.8 %*	*52.1-176*

Sample ID: POINT 2 @ SURFACE (H501850-02)

Chloride, SM4500Cl-B mg/kg **Analyzed By: AP**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	07/20/2015	ND	416	104	400	7.41	

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	07/17/2015	ND	179	89.5	200	12.7	
DRO >C10-C28	<10.0	10.0	07/17/2015	ND	161	80.7	200	16.2	

Surrogate: 1-Chlorooctane	*87.5 %*	*47.2-157*
Surrogate: 1-Chlorooctadecane	*93.0 %*	*52.1-176*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

Analytical Results For:

BASIN ENVIRONMENTAL - HOBBS
KYLE NORMAN
419 W. CAIN
HOBBS NM, 88240
Fax To: (575) 393-0293

Received:	07/17/2015	Sampling Date:	07/15/2015
Reported:	07/20/2015	Sampling Type:	Soil
Project Name:	EVGSAU 3127-398	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Judy Garcia
Project Location:	NOT GIVEN		

Sample ID: POINT 3 @ SURFACE (H501850-03)

Chloride, SM4500Cl-B mg/kg **Analyzed By: AP**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	07/20/2015	ND	416	104	400	7.41	

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	07/17/2015	ND	179	89.5	200	12.7	
DRO >C10-C28	<10.0	10.0	07/17/2015	ND	161	80.7	200	16.2	

Surrogate: 1-Chlorooctane	*82.7 %*	*47.2-157*
Surrogate: 1-Chlorooctadecane	*88.2 %*	*52.1-176*

Sample ID: POINT 3 @ 6" (H501850-04)

Chloride, SM4500Cl-B mg/kg **Analyzed By: AP**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	07/20/2015	ND	416	104	400	7.41	

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	07/17/2015	ND	179	89.5	200	12.7	
DRO >C10-C28	<10.0	10.0	07/17/2015	ND	161	80.7	200	16.2	

Surrogate: 1-Chlorooctane	*80.7 %*	*47.2-157*
Surrogate: 1-Chlorooctadecane	*87.0 %*	*52.1-176*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

Analytical Results For:

BASIN ENVIRONMENTAL - HOBBS
KYLE NORMAN
419 W. CAIN
HOBBS NM, 88240
Fax To: (575) 393-0293

Received:	07/17/2015	Sampling Date:	07/16/2015
Reported:	07/20/2015	Sampling Type:	Soil
Project Name:	EVGSAU 3127-398	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Judy Garcia
Project Location:	NOT GIVEN		

Sample ID: POINT 1 @ 1' (H501850-05)

Chloride, SM4500Cl-B mg/kg **Analyzed By: AP**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**1070**	16.0	07/20/2015	ND	416	104	400	7.41	

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	07/18/2015	ND	179	89.5	200	12.7	
DRO >C10-C28	<10.0	10.0	07/18/2015	ND	161	80.7	200	16.2	

Surrogate: 1-Chlorooctane	*90.4 %*	*47.2-157*
Surrogate: 1-Chlorooctadecane	*96.8 %*	*52.1-176*

Sample ID: POINT 2 @ 6" (H501850-06)

Chloride, SM4500Cl-B mg/kg **Analyzed By: AP**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	07/20/2015	ND	416	104	400	7.41	

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	07/18/2015	ND	179	89.5	200	12.7	
DRO >C10-C28	<10.0	10.0	07/18/2015	ND	161	80.7	200	16.2	

Surrogate: 1-Chlorooctane	*84.6 %*	*47.2-157*
Surrogate: 1-Chlorooctadecane	*90.7 %*	*52.1-176*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

Celey D. Keene, Lab Director/Quality Manager

Rush

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

Company Name: ConocoPhillips	**BILL TO**
Project Manager: Kyle Norman	**P.O. #:**
Address: 419 W Cain	**Company:** Basin
City: Hobbs **State:** NM **Zip:** 88240	**Attn:**
Phone #: 575-393-2967 **Fax #:** 575-393-0293	**Address:** 419 W Cain
Project #: **Project Owner:**	**City:** Hobbs
Project Name: CoP	**State:** NM **Zip:** 88240
Project Location: EVGSAU 3127-398	**Phone #:** 575-393-2967
Sampler Name: Chris Flores	**Fax #:** 575-393-0293

FOR LAB USE ONLY Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX: GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	PRESERV.: ACID/BASE:	ICE / COOL	OTHER :	SAMPLING: DATE	TIME	Chlorides	TPH 8015 M	BTEX	Texas TPH	Complete Cations/Anions	TDS
H501850-1	Point 1 @ Surface	G	1			✓					✓		7-15-2015	8:30 Am	X	X				
-2	Point 2 @ Surface	G	1			✓					✓			8:40 Am	X	X				
-3	Point 3 @ Surface	G	1			✓					✓			8:45 Am	X	X				
-4	Point 3 @ 6"	G	1			✓					✓			8:50 Am	X	X				
-5	Point 1 @ 1'	G	1			✓					✓		7-16-2015	9:10 Am	X					
-6	Point 2 @ 6"	G	1			✓					✓			9:20 Am	X	X				

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 consequental 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.

Relinquished By:	**Date:** 7-17-2015 **Time:**	**Received By:**	Judy Garcia
Relinquished By:	**Date:** 7/17/15 **Time:** 11:42	**Received By:**	
Delivered By: (Circle One) Sampler - UPS - Bus - Other:	3.8° C	**Sample Condition** Cool ☑ Yes ☐ No Intact ☑ Yes ☐ No	**CHECKED BY: (Initials)**

Phone Result: ☐ Yes ☑ No **Add'l Phone #:**
Fax Result: ☐ Yes ☑ No **Add'l Fax #:**
REMARKS:
email results:
hconder@basinenv.com; knorman@basinenv.com;
jkamplain@basinenv; lflores@basinenv; lweinheimer@basinenv;
cursanic@basinenv; sedwards@basinenv
environmental tech: cflores @basinenv

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

#54