Conoco Phillips Company MCA Battery #1 Trunkline Order # 1RP-772

March 27, 2020 Page 1



March 27, 2020

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

Re: MCA Battery #1 Trunkline Leak Event Date: December 6, 2000 Lea, New Mexico Order #: 1RP-772

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 Battery #1 Trunkline Leak which occurred on December 6, 2000, hereinafter referred to as the "Site".

#### Desktop Review

- ✓ Spill GPS Location: 32.811186, -103.79115; Sect 29, T 17 S, R 32
- ✓ The original State of New Mexico Oil Conservation District (NMOCD) C-141 Spill form for initial reporting of the loss was not available for the site. The Conoco Record of Accidental Discharge and the C-141 Closure form is included in Attachment A.
- ✓ The Oil Conservation Division Permitting Spill Search Form states that 250 Barrels of produced water were released, and 200 barrels were recovered for a net loss of 50 barrels. It also indicates that no waterways were affected, and no groundwater impacts. Depth to groundwater is listed at 90 feet. A copy of the online report is shown in Attachment B.
- ✓ The MCA BTRY #1 Trunkline Release Report (BCC International, 4/12/2002) states that a reduction of chlorides is noted from 3 feet to 30 feet. Soil lithology at the site consists of caliche and sandstone near the surface. The report states that based on this lithology, migration to groundwater is unlikely and only surface remediation is necessary. The report is included in Attachment C.
- ✓ A review of past and present aerial photographs shows that the release 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 past the release date show no impact from this release.

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 D, page 3 of new C-141 form

✓ A copy of the results is shown in Attachment D below. The release is not expected to have impacted groundwater which is present at a depth of approximately 65 feet. No other 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

Based on aerial imagery of the release area, no surface impacts migrated off the pipeline right of way. Initial remediation recovered 200 of 250 barrels of produced water. Chloride levels are confirmed to be decreasing from 3 feet to 30 feet in depth. Lithology consists of caliche and sandstone. The estimated depth to groundwater is 65 feet. Therefore, Apex respectfully requests, on behalf of Conoco Phillips, a finding of no further action.

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,

Clut Ward

Clint Ward Project Manager

A. W. Robuell

Hank W. McConnell Branch Manager



- B: State of New Mexico Oil Conservation online report
- C: MCA BTRY #1 Trunkline Release Report (BCC International, 4/12/2002)
- D: C-141 Page 3, Site Assessment/Characterization

#### Figures:

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

March 27, 2020

Page 1



# Attachment A

Original State of New Mexico Oil Conservation

District C-141 Spill form

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Oil Conservation Division

Incident ID	
District RP	1RP-772
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.

<b>Closure Report Attachment Checklist:</b> 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 photographs be notified 2 days prior to liner inspection)	s of the liner integrity if applicable (Note: appropriate OCD District office
Laboratory analyses of final sampling (Note: appropriate OD	C 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 certa may endanger public health or the environment. The acceptance o should their operations have failed to adequately investigate and re human health or the environment. In addition, OCD acceptance of	ations. The responsible party acknowledges they must substantially onditions that existed prior to the release or their final land use in OCD when reclamation and re-vegetation are complete.
OCD Only	
Received by:	Date:
	y 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:

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## 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	<b>Final Report Date</b>	Material Spilled	Volume Spilled
nPAC0606852536	fPAC0605529397	ConocoPhillips MCA 1 Trunkline Leak			56707	CONOCOPHILLIPS & BHP PETROLEUM CO., INC.	Major	Produced Water Release	Federal	Industry Rep	12/6/2000			Produced Water	250

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
200	50	BBL		Pipeline (Any)	Hobbs	Lea (25)	-29-17S- 32E		29	175	32E	32.81186	-103.79115	No	No	90



# Attachment C

MCA BTRY #1 Trunkline Release Report (BCC International, 4/12/2002)



2

# CONOCO INC.

10 of 30

1/21/2023 11:48:13

# MCA BTRY #1 TRUNKLINE LEAK

#### **ENVIRONMENTAL SITE INVESTIGATION**

PERFORMED BY:

**BBC INTERNATIONAL, INC.** WORLD-WIDE ENVIRONMENTAL SPECIALISTS 1324 W. MARLAND BLVD. P. O. BOX 805 HOBBS, NEW MEXICO 88240 (505)397-6388 • FAX (505)397-0397 EMAIL: bbc@bbcinternational.com WEBSITE: www.bbcinternational.com

**NOVEMBER 19, 2001** 

PREPARED FOR:

MR. JOHN COY CONOCO INC. **PO BOX 180** MALJAMAR, NEW MEXICO 88264

aulity - 17817 haulity - nPAC dede 852536

application - pfACObds52740

WORLD-WIDE ENVIRONMENTAL SPECIALISTS



PHONE (505) 397-6388 • FAX (505) 397- 0397 • 1324 W. MARLAND • P.O. BOX 805 • HOBBS, NM 88241-0805 E-MAIL: bbc@bbcinternational.com

April 12, 2002

Chris Williams NM Oil Conservation Division

Hobbs, NM 88240

RE: Conoco, Inc. – MCA Btry #1 Trunkline Leak

Dear Mr. Williams:

BBC International, Inc. respectfully submits this site investigation report for the MCA Btry #1 Trunkline Leak on behalf of Conoco, Inc.

This site is an area that was investigated due to an injection line leak that occurred on December 6, 2000 Approximately 250 barrels of produced water was released with 200 barrels recovered:

The initial investigation and sampling was conducted on January 25, 2001. Additional samples were taken at greater depths on October 11, 2001. This report details the results.

As can be found in the report, the chlorides are reduced greatly at depth. The recommendation is to halt any further investigations activities and conduct surface remediation measures only.

I look forward to your review of this report and the agreement to our recommendation. If you have any questions, please do not hesitate to contact me at (505)397-6388 or at the address above.

Sincerely,

**BBC International, Inc.** 

Ken Swinney, CEI, CRS Director of Operations

KS:js

encl.

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# Conoco MCA Btry #1 Trunkline Leak 12/6/00

#### **1.0 INTRODUCTION**

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UNIT LETTER. Z

The subject site is located south of Maljamar, New Mexico in Section 29, Township 17 South, Range 32 East. The site consists of undeveloped range land. On December 6, 2000 a trunkline leaked approximately 250 barrels of produced water, with approximately 200 barrels being recovered from the surface.

#### 2.0 SITE CHARACTERIZATION

The leak area is in a depression surrounded by sand hills. The leak area runs East-West for approximately 76 feet. The leak area is approximately 24 feet wide at the widest point. The surface soil is red sand. There is no water source within 1,000 feet of the site. There is no surface water within 1,000 feet of the site. Based on data from the ground water monitoring well located at the Conoco Maljamar Plant, depth to ground water is approximately 90 feet.

#### 3.0 SITE INVESTIGATION ACTIVITIES

On January 25, 2001, BBC personnel conducted an inspection of the site. Three sample points were dug at the site, using a backhoe, to a depth of approximately 21 feet. Samples were taken at 3 feet and at 20 feet at sample point MC1-1, at 3 feet and at 21 feet at sample point MC1-2, and at 11 feet and 20.5 feet at sample point MC1-3. On October 11, 2001, BBC personnel returned to the site to take additional soil samples at greater depths. One sample point was drilled to a depth of 30 feet using BBC's tractor mount drilling rig. Samples were taken at 25 feet and 30 feet at sample point MCA 1. Field screening for chloride was performed on site. Field screening data is located on Figure 1. Soil samples were then sent to Cardinal Laboratories for analysis. Lab results are located on Figure 1 and in Appendix I. Pictures of investigation activities are located in Appendix II.

#### 4.0 CONCLUSION AND RECOMMENDATION

Laboratory analysis for TPH and BTEX shows TPH at levels well below OCD guidelines and BTEX at non-detect. Therefore, TPH and BTEX are not considered an environmental concern at this site. The lab results for TPH and BTEX are located in Appendix 1. The data shows a reduction in chloride concentrations from 3 feet to approximately 30 feet. At the 25 feet and 30 feet depths the chloride concentrations are 752 ppm and 400 ppm respectively, this reduction is significant. The lab results for chloride is located on Figure 1 and in Appendix I. Taking into consideration that the depth to groundwater is greater than sixty-five feet, and the subsurface soil lithology at the site consists of caliche and sandstone layers, it is evident that the migration of chlorides to groundwater is unlikely. Therefore it is recommended that only surface remediation is necessary. This could consist of the addition of gypsum, ammonium nitrate, Salt Block, or other amendments that will reduce the chloride concentrations in the soil to allow for revegetation.

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# Figure 1

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SAMPLE POINT	DEPTH	FIELD CHLORIDE	LAB CHLORIDE
M1-1 ·	3'	3800 PPM	4110 PPM
M1-1	20'	1900 PPM	2220 PPM
M1-2	3'	3000 PPM	2750 PPM
M1-2	21'	700 PPM	550 PPM
M1-3*	11'	3000 PPM	3230 PPM
M1-3	20.5'	2700 PPM	2910 PPM
MCA 1	25'	890 PPM	752 PPM
MCA 1	30'	400 PPM	400 PPM

\*Could not get extraction on field analysis above 11' at point M1-3

LEGEND

3 Inch Pipeline

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BBC sample point 01-25-01 and 10-11-01 grab sample

BBC INTERN	ATIONAL, INC.
CONOCO	MCA BTRY #1
Date: 11-19-01	Drawn By: Kon
Disk:	Sheet of Sheets
Scale: Not to Scale	File Name

# Appendix I

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PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR BBC INTERNATIONAL, INC. ATTN: CLIFF BRUNSON P.O. BOX 805 HOBBS, NM 88241 FAX TO: (505) 397-0397

Receiving Date: 10/15/01 Reporting Date: 10/16/01 Project Owner: CONOCO Project Name: MCA BATTERY #1 Project Location: MALJAMAR Analysis Date: 10/16/01 Sampling Date: 10/11/01 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: BC Analyzed By: AH

CI

LAB NUMBER	SAMPLE ID	(mg/Kg)
H6216-1	MCA 1-25'	752
H6216-2	MCA 1-30'	400
Quality Control		1010
True Value QC		1000
% Recovery		101
Relative Percent	Difference	1.0
AETHOD: Standar	d Methods	4500-CIB

Analyses performed on 1:4 w:v aqueous extracts.

emist

10-16-01

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21/2023

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ANALYTICAL RESULTS FOR BBC INTERNATIONAL ATTN: CLIFF P. BRUNSON P.O. BOX 805 HOBBS, NM 88241 FAX TO: (505) 397-0397

Receiving Date: 01/26/01 Reporting Date: 01/30/01 Project Number: NOT GIVEN Project Name: MCA BTR #1 Project Location: MALJAMAR

Sampling Date: 01/25/01 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: BC Analyzed By: BC/AH

LAB NUMBE	R SAMPLE ID	TPH (mg/Kg)	Cl* (mg/Kg)
ANALYSIS D	DATE:	01/26/01	01/30/01
H5556-1	MC1-1-3'	<10	4110
H5556-2	MC1-1-20'	11.2	2220
H5556-3	MC1-2-3'	<10	2750
H5556-4	MC1-2-21'	<10	550
H5556-5	MC1-3-11'	<10	3230
H5556-6	MC1-3-20.5'	11.3	2910
Quality Cont	rol	241	1051
True Value C	QC	240	1000
% Recovery		100	105
<b>Relative</b> Per	cent Difference	3.9	3.9

METHODS: TPH-EPA 600/4-79-020 418.1; CI-Std. Methods 4500-CI'B \*Analyses performed on 1:4 w:v aqueous extracts.

Jess for Coshi

30/01

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ANALYTICAL RESULTS FOR **BBC INTERNATIONAL** ATTN: CLIFF P. BRUNSON 1324 W. MARLAND HOBBS, NM 88240 FAX TO: 505-392-0397

Receiving Date: 01/25/01 Reporting Date: 01/30/01 Project Number: NOT GIVEN Project Name: MCA BTR #1 Project Location: MALJAMAR Sampling Date: 01/25/01 Sample Type: SOIL Sample Condition: COOL, INTACT Sample Received By: BC Analyzed By: JA

SAMPLE ID	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
E	01/30/01	01/30/01	01/30/01	01/30/01
MC1-1-3'	< 0.002	< 0.002	< 0.002	< 0.006
MC1-1-20'	< 0.002	< 0.002	< 0.002	<0.006
MC1-2-3'	< 0.002	< 0.002	< 0.002	< 0.006
MC1-2-21'	< 0.002	< 0.002	< 0.002	< 0.006
MC1-3-11'	< 0.002	< 0.002	< 0.002	< 0.006
MC1-3-20.5'	<0.002	<0.002	<0.002	<0.006
	0.099	0.114	0.103	0.315
	0.100	0.100	0.100	0.300
	. 99	114	103	105
t Difference	2.9	2.5	0.7	4.4
	E MC1-1-3' MC1-1-20' MC1-2-3' MC1-2-21' MC1-3-11'	SAMPLE ID   (mg/Kg)     E   01/30/01     MC1-1-3'   <0.002	SAMPLE ID   (mg/Kg)   (mg/Kg)     E   01/30/01   01/30/01     MC1-1-3'   <0.002	BENZENE (mg/Kg)   TOLUENE (mg/Kg)   BENZENE (mg/Kg)     E   01/30/01   01/30/01   01/30/01     MC1-1-3'   <0.002

METHOD: EPA SW 846-8020, 5030, Gas Chromatography

femist

1-30-01 Date

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N N N	ARDINAL LABORATORIES, INC. 2111 Beechwood, Abliene, TX 79603 101 E 1015, 573-7001 Fax (915) 673-7020 (505)	NC. 101 East Mariand, Hobbs, NM 88240 (505) 393-2326 Fax (505) 393-2476	ast Marland, Hobbs, NM 882 393-2326 Fax (505) 393-2476	88240 176		Page_1_ of _1
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Project Manager.	01.44		P.O. &			
Address: 13 24	N. M		Company:	Came		
City: Hobbi	• • •	98240	Attn:	لم		
	nr - 397 - 2311 Fark 1.505 - 357 - 0322	352-0357	Address:	abore		
Project #:			Cţţ;			
in	MCA BTR #1		State:	Zlp:		
Project Location:	3		Phone #:			
Sampler Name:	16.00	-	Fax S:	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	· · J	
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↑ Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476.

# CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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# **Appendix II**

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BBC INTERNATIONAL

MCA Battery #1 Trunkline Leak – Sample taken at 25' and 30' on 10-11-01



# ATTACHMENT D

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?	<u>    90  (</u> 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 <b>not</b> on an exploration, development, production, or storage site?	🗌 Yes 🛛 No





## **Figures**

Site Location Map

Site Radius Map

**TOPO radius Map** 

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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:
JOHN H HENDRIX CORP P.O. Box 3040	12024
	Action Number:
Midland, TX 79702	209718
	Action Type:
	[IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

Created By	Condition	Condition Date
amaxwell	Historical document review. Closure approved.	4/26/2023

CONDITIONS

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