Order # 1RP-1869

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

Conoco Phillips Company MCA Injection Station #2



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.



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

Clint Ward Project Manager

A. W. Robuell

Hank W. McConnell Branch Manager



- 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

March 27, 2020

Page 1







# Attachment A

# Original State of New Mexico Oil Conservation

District C-141 Spill form

District I 625 N. French	Dr., Hobbs,	NM 88240				f New Mex			Form C-141 Basised Ottober 10, 200					
301 W. Grand Avenue, Artesia, NM 88210						inerals and Natural Resources				Revised October 10, 2003				
000 Rio Brazos Road, Aztec, NM 87410						ervation Div			Submit 2 Copies to appropriate District Office in accordance					
District IV 220 S. St. Fran	ncis Dr., Sant	a Fe, NM 8750	5			th St. Franc				W	ith Rule 116 on side of			
220 5. 50. 114			·····			Fe, NM 875						_		
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				L.,								<u> </u>		
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By Whom?						ate and Hour 05-19-2008 1450					WEL			
Was a Water						f YES, Volume Impacting the Watercourse.								
			] Yes 🛛	No	N/.	Α			M	AY 212	กกร			
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Describe Are	ea Affected	and Cleanup	Action Tal	ken.*				0+ 0		- 1	<u> </u>			
was recove	red. The s	spill was not	t contain		appro	ximately 150	ck to pick up th 00 sq ft of prepa ines.							
regulations a public health should their o	Il operators or the envi operations h	are required to ronment. The nave failed to	to report and acceptant adequately	nd/or file certain i ce of a C-141 repo investigate and r	release ort by remedi	notifications a the NMOCD m ate contaminat	knowledge and u nd perform correct narked as "Final R ion that pose a thr	ctive actio (eport" do reat to gro	ons for reli- bes not reli- bund water	eases which ieve the ope r, surface w	may endanger rator of liability ater, human hea	r		
		ws and/or reg		nance of a C-141			ve the operator of			• 				
Signature:						OIL CONSERVATION DIVISION					JIN			
Printed Name: Mickey Garner						Approved by District Supervisor: Chino Williams					aus			
Title: HSEI	R Lead					Approval Da	te: 5/21/00	2	xpiration	Date: S	1/21/08			
E-mail Addro	ess: Mickey	.D.Garner@	conocoph	illips.com		Conditions o	f Approval:			Attached				
	-2008			575.391.3158			IT FULL D				# 1869	· ······		
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Oil Conservation Division

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.

<b><u>Closure Report Attachment Checklist</u></b> : Each of the following	items must be included in the closure report.
$\mathbf{X}$ A scaled site and sampling diagram as described in 19.15.29.	11 NMAC
Photographs of the remediated site prior to backfill or photomust 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 of should their operations have failed to adequately investigate and re- human health or the environment. In addition, OCD acceptance of	lations. 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 for 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	ΑΡΙ	Well	OGRID	Operator Name	Severity	Incident Type	Lease Type	Spill Referrer	Incident Date	Notification Date	Final Report Date	Material Spilled	Volume Spilled
nCOH0815151114	ļ		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?	<u>120 (</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 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:
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

Comprisione		
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

Action 209712