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

ATTACHMENT

Form C-141
Revised March 17, 1999

Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

Release Notification and Corrective Action

OPERATOR

X Initial Report ☐ Final Repo

Name of Company ConocoPhillips	Contact Mark Bishop
Address 921 W Sanger	Telephone No. 505-391-1956
Facility Name Maljamar Gas Plant, gas gathering system	Facility Type Gas pipeline

Surface Owner BLM	Mineral Owner	Lease No.

LOCATION OF RELEASE

300'

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
	31	17	32	Est.1700	South	Est.1020	East	Lea

NATURE OF RELEASE

Type of Release Crude oil/condensate	Volume of Release est 15-25BBL.	Volume Recovered 0 BBL.
Source of Release Pipeline	Date and Hour of Occurrence (Historic, unknown)	Date and Hour of Discovery April 17, 2003
Was Immediate Notice Given? ☐ Yes X No ☐ Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? ☐ Yes X No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* Initially intended to remove small amount of oil stained soil from around an old pipeline drip location recently exposed in sand dunes. Upon further investigation found much greater extent of contamination underground. Removed 126 yards of contaminated soil to proper disposal facility but found conventional remediation techniques impractical due to remoteness of location. We will transfer remediation of spill area to our expert Remediation Technology team to for formulation of remediation plan. Estimate an additional 300 yards of contaminated soil on location.

Describe Area Affected and Cleanup Action Taken.* Area is in remote sand dunes and requires inspection by foot or specialized vehicle. Will asses appropriate remediation techniques for situation and work with authorities to formulate plan and remediate remainder of site.

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:	OIL CONSERVATION DIVISION
Printed Name: Mark Bishop	Approved by District Supervisor:
Title: Environmental Specialist	Approval Date: / Expiration Date:
Date: April 21, 2003 Phone: 505-391-1956	Conditions of Approval: / Attached ☐

* Attach Additional Sheets If Necessary

Conoco Phillips - 217817
facility fPAC 0610049406

incident - nPAC 0610049505
application - pPAC 0610049889

MAXIM TECHNOLOGIES
A DIVISION OF TETRA TECH, INC.

1703 W. Industrial Ave.
Midland, Texas 79701
(432) 686-8081

July 30, 2004

Mr. Paul Sheeley
New Mexico Oil Conservation Division
1625 N. French Drive
Hobbs, New Mexico 88240

RE: Lusk Discharge Line Release – Path Forward
Location SE Qtr, Sec 31, T 17, R 32 E

Dear Mr. Sheeley:

As you know, ConocoPhillips has delayed the remediation of the subject release Site to allow Mack Energy to prepare a drilling pad, Weasel #1, south of the Site. This drill pad was to be used as a staging area and reduce surface disturbance in an ecologically sensitive dune area. The planned remediation included excavation, hauling and backfilling soil in response to a condensate release found on April 17, 2003 (Form C-141 is attached). An estimated 15 – 25 barrels of condensate was released into the sand dune area in which the pipeline right-of-way passes through.

Maxim Technologies, Inc. (Maxim) submitted a report to the U.S. Bureau of Land Management (BLM) and to the New Mexico Oil Conservation Division (NMOCD) during July 2003 summarizing the soil data collected adjacent to the pipeline during two sampling events. Maxim also collected soil data on January 6, April 27 and May 19, 2004 (Tables 1 and 2). Based on the risk-based ranking criteria presented in the NMOCD *Guidelines for Remediation of Leaks, Spills and Released*, the affects related to the April 2003 release were above the NMOCD action levels [Total ranking score of 10, with site-specific remediation levels of 5,000 milligrams per kilogram for total petroleum hydrocarbon (TPH) and 50 parts per million (ppm) from a Photo-Ionization Detector (PID) for benzene, toluene, ethylbenzene and total xylene].

Table 1.
Lusk Discharge Line
Photo-Ionization Detector Readings

Depth	May 15, 2003 Readings at Sampling Location						June 26, 2003 Readings at Sampling Location								May 27, 2004
(ft)	HA -1	HA -2	HA -3	BH-4	BH-5[1]	HA -6[1,2]	HA -1	HA -2	HA -3	BH-4	BH-5[1]	HA -6[2]			HA-6[2]
0-3	0.3	1.0	0.7	17.0	-	48.0					-	10.7			0
5															1348
3-6	0.3	0.5	0.8	4.5	-		0.2	0.7	0.5	2.0	-				845
6-9	0.8	0.4	0.4	1.4	-						-				
9-12	0.4	0.2	0.4	1.1	15.7		0.6	0.2	1.5	0.9	50.8				

[1] Below bottom of excavated area
[2] Inside condensate/crude oil affected area
Results in parts per million (ppm)

HA = Hand auger
BH = Backhoe
SH = Hand shovel

Table 2.
Lusk Discharge Line
Delineation of Condensate/Crude Oil Release

Parameter	Data Analysis - Sampling Locations and Sampling Dates																	
	HA -1		HA -2		HA -3		BH-4		BH-5[1]	HA -6[1]			SH -7[2]				SH-8	
Sampling Date	5-15-2003	6-26-2003	5-15-2003	5-15-2003	5-15-2003	5-15-2003	5-15-2003	6-26-2003	6-26-2003	5-15-2003	4-27-2004	5-19-2004		1-06-2004	4-27-2004	5-19-2004		5/19/2004	
Laboratory	STL	STL	STL	STL	STL	STL	STL	STL	STL	STL	STL	STL	LL	STL	STL	STL	LL	STL	LL
Sample Depth (ft)	6	12	6	11	6	10	3	10	13	2	6[3]	5[3]	5[3]	2	2	5[3]	5[3]	2	2
TPH (mg/Kg)																			
Diesel Range	4.2	6	12	1.8	2.6	2.3	2.5	ND	18	9,000	14,000	19,000	8,300	7,800	15,100* 18,000**	9,400	17,000	7,200	10,000
Gasoline Range	ND	ND	ND	ND	ND	ND	ND	ND	214	27.5	370	920	570	7.8	36.7 2.1	5.9	57	3.5	68
SPLP (mg/Kg)																			
Semivolatiles								ND											
Volatiles								ND											
Volatile Organics (mg/Kg)																			
Benzene											0.32			ND					
Ethylbenzene											0.66			ND					
Toluene											0.45			ND					
Xylenes (total)											1.20			ND					
Moisture (%)								31											
Cl (mg/Kg)	11.4	ND	36.7	10.9	31.2	17.7	37.4	ND	91.9	13									

[1] Below bottom of excavated area
[2] Inside condensate/crude oil affected area
[3] Sample taken at point of auger rejection
ND – not detected
Results in milligrams per kilogram (mg/Kg)

HA = Hand auger
BH = Backhoe
SH = Hand shovel

STL = Severn Trent Laboratories
LL = Lancaster Laboratories

* NMOCD data
** Corrected value (analyst error in entering the dilution factor for TPH-DRO)

It is ConocoPhillips intention to excavate the condensate affected soil and haul this soil to a State approved disposal location. However, we plan to use Mack Energy's Weasel #4 well pad located approximately 100 feet northwest of the release Site (Figure 1). The reason for the change is Weasel #4 is constructed and #1 has not been built. It is anticipated that two pipeline right-of-ways will be used to access the Site. These right-of-ways and the area around the release location will be archaeologically examined prior to commencement of excavation. Maxim will make all necessary pre-start notifications and notify the BLM and the NMOCD at least 48 hours in advance of initiation of excavation at the Site.

To ensure all soil left in place is within NMODC remediation standards, excavation side wall (4) and bottom (1) samples will be collected, split, and tested. One split will be field soil vapor headspace tested using a PID. A PID reading of < 50 ppm will be the criteria used to stop further excavation. The second split will be placed into glass sample jars, sealed with Teflon-lined lids, and placed on ice for transportation to an analytical laboratory. These spilt samples will be analyzed for TPH (Method 8015 GRO-DRO) and used for confirmation.

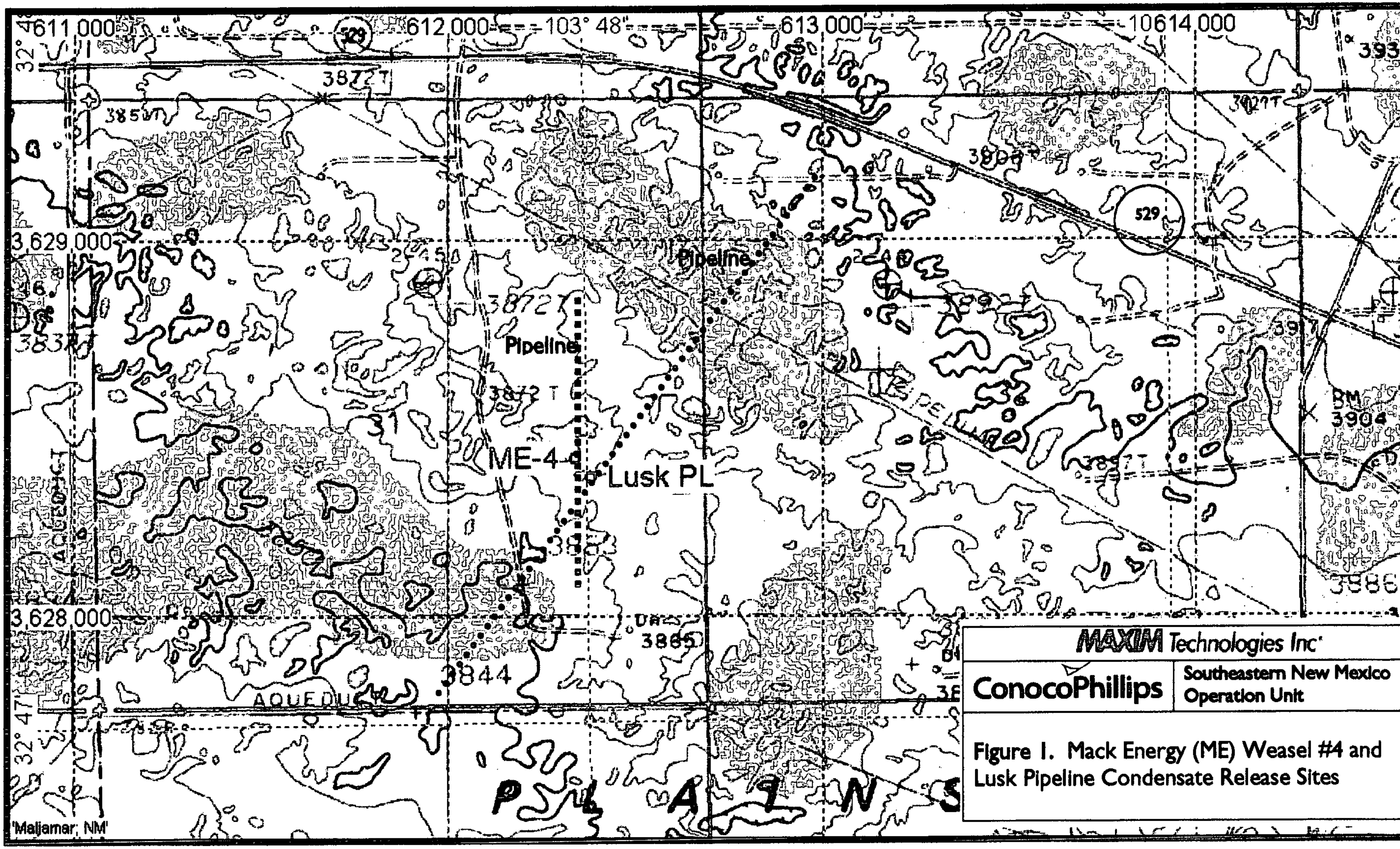
We are prepared to initiate these actions as soon as we receive your approval to proceed. If you have any questions regarding this approach, please do not hesitate to contact me or Mr. Charles Durrett (Maxim Technologies) at 432-686-8081.

Sincerely,
MAXIM TECHNOLOGIES

Charles Durrett
Digitally signed by Charles Durrett
DN: CN = Charles Durrett, C = US, O = Maxim Technologies, Inc.
Date: 2004.07.30 16:43:25 -05'00'

Charles Durrett
Office Manager

Cc: Mr. Ken Andersen, ConocoPhillips
Mr. Neal Goates, ConocoPhillips
Mr. Paul Evans, U.S. Bureau of Land Management



MAXIM Technologies Inc

ConocoPhillips

Southeastern New Mexico Operation Unit

Figure 1. Mack Energy (ME) Weasel #4 and Lusk Pipeline Condensate Release Sites

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
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State of New Mexico
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Revised March 17, 1999

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Release Notification and Corrective Action

OPERATOR

X Initial Report ☐ Final Repo

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Address 921 W Sanger	Telephone No. 505-391-1956
Facility Name Maljamar Gas Plant, gas gathering system	Facility Type Gas pipeline

Surface Owner BLM	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
	31	17	32	Est.1700	South	Est.1020	East	Lea

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Source of Release Pipeline	Date and Hour of Occurrence (Historic, unknown)	Date and Hour of Discovery April 17, 2003
Was Immediate Notice Given? ☐ Yes X No ☐ Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? ☐ Yes X No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

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Signature:	OIL CONSERVATION DIVISION	
Printed Name: Mark Bishop	Approved by District Supervisor:	
Title: Environmental Specialist	Approval Date:	Expiration Date:
Date: April 21, 2003 Phone: 505-391-1956	Conditions of Approval:	Attached ☐

* Attach Additional Sheets If Necessary

MAXIM TECHNOLOGIES
A DIVISION OF TETRA TECH, INC.

1703 W. Industrial Ave.
Midland, Texas 79701
(432) 686-8081

July 30, 2004

Mr. Paul Sheeley
New Mexico Oil Conservation Division
1625 N. French Drive
Hobbs, New Mexico 88240

RE: Lusk Discharge Line Release – Path Forward
Location SE Qtr, Sec 31, T 17, R 32 E

Dear Mr. Sheeley:

As you know, ConocoPhillips has delayed the remediation of the subject release Site to allow Mack Energy to prepare a drilling pad, Weasel #1, south of the Site. This drill pad was to be used as a staging area and reduce surface disturbance in an ecologically sensitive dune area. The planned remediation included excavation, hauling and backfilling soil in response to a condensate release found on April 17, 2003 (Form C-141 is attached). An estimated 15 – 25 barrels of condensate was released into the sand dune area in which the pipeline right-of-way passes through.

Maxim Technologies, Inc. (Maxim) submitted a report to the U.S. Bureau of Land Management (BLM) and to the New Mexico Oil Conservation Division (NMOCD) during July 2003 summarizing the soil data collected adjacent to the pipeline during two sampling events. Maxim also collected soil data on January 6, April 27 and May 19, 2004 (Tables 1 and 2). Based on the risk-based ranking criteria presented in the NMOCD *Guidelines for Remediation of Leaks, Spills and Released*, the affects related to the April 2003 release were above the NMOCD action levels [Total ranking score of 10, with site-specific remediation levels of 5,000 milligrams per kilogram for total petroleum hydrocarbon (TPH) and 50 parts per million (ppm) from a Photo-Ionization Detector (PID) for benzene, toluene, ethylbenzene and total xylene].

Table 1.
Lusk Discharge Line
Photo-Ionization Detector Readings

Depth	May 15, 2003 Readings at Sampling Location						June 26, 2003 Readings at Sampling Location								May 27, 2004
(ft)	HA -1	HA -2	HA -3	BH-4	BH-5*	HA -6**	HA -1	HA -2	HA -3	BH-4	BH-5[1]	HA -6[2]			HA-6[2]
0-3	0.3	1.0	0.7	17.0	-	48.0					-	10.7			0
5															1348
3-6	0.3	0.5	0.8	4.5	-		0.2	0.7	0.5	2.0	-				845
6-9	0.8	0.4	0.4	1.4	-						-				
9-12	0.4	0.2	0.4	1.1	15.7		0.6	0.2	1.5	0.9	50.8				

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Results in parts per million (ppm)

HA = Hand auger
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Table 2.
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Delineation of Condensate/Crude Oil Release

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Laboratory	STL	STL	STL	STL	STL	STL	STL	STL	STL	STL	STL	STL	LL	STL	STL	STL	LL	STL	LL
Sample Depth (ft)	6	12	6	11	6	10	3	10	13	2	6[3]	5[3]	5[3]	2	2	5[3]	5[3]	2	2
TPH (mg/Kg)																			
Diesel Range	4.2	6	12	1.8	2.6	2.3	2.5	ND	18	9,000	14,000	19,000	8,300	7,800	15,100* 18,000**	9,400	17,000	7,200	10,000
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Moisture (%)								31											
Cl (mg/Kg)	11.4	ND	36.7	10.9	31.2	17.7	37.4	ND	91.9	13									

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* NMOCD data
** Corrected value (analyst error in entering the dilution factor for TPH-DRO)

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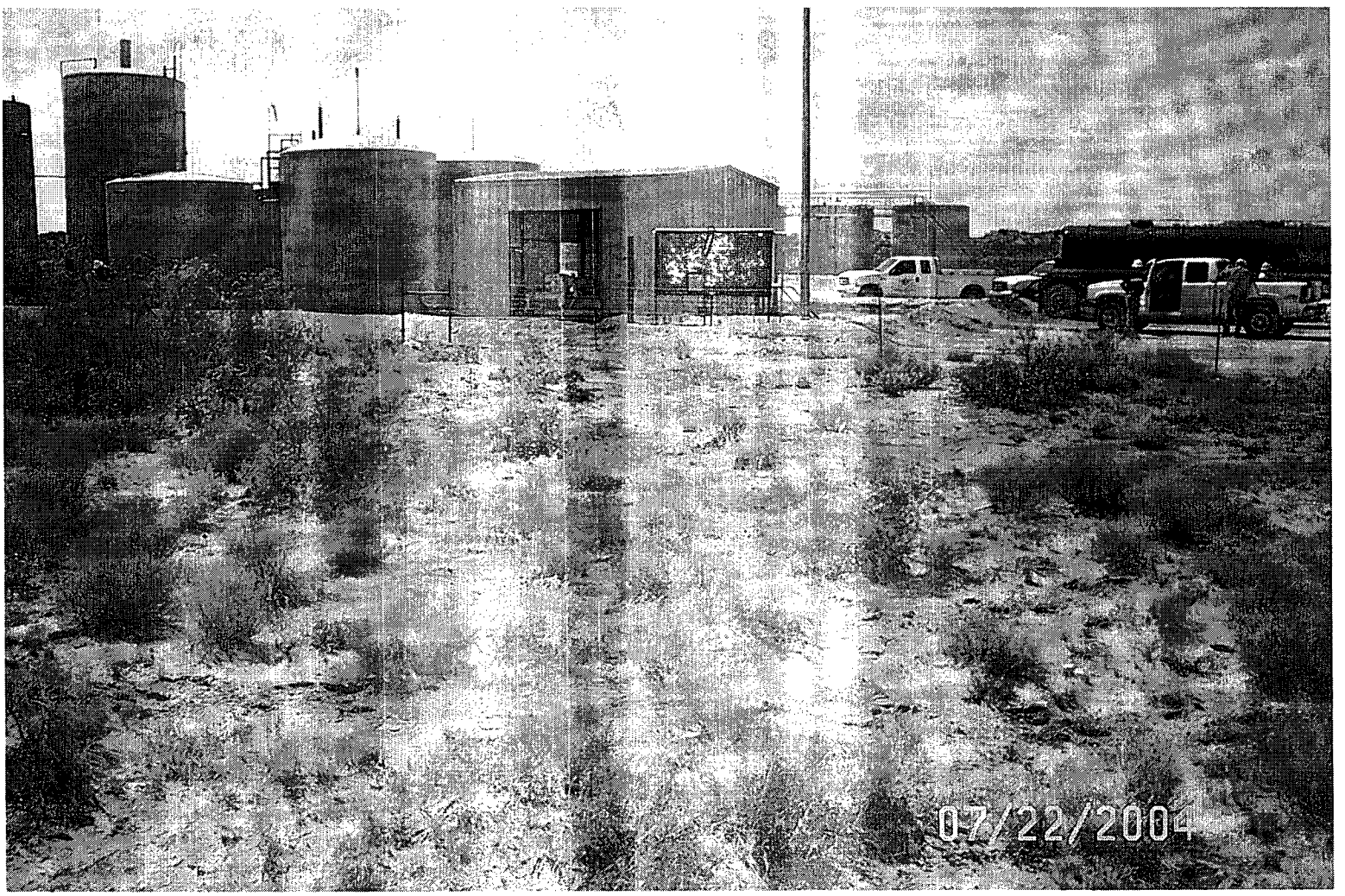
We are prepared to initiate these actions as soon as we receive your approval to proceed. If you have any questions regarding this approach, please do not hesitate to contact me or Mr. Charles Durrett (Maxim Technologies) at 432-686-8081.

Sincerely,
MAXIM TECHNOLOGIES

Charles Durrett
Digitally signed by Charles Durrett
DN: CN = Charles Durrett, C = US, O = Maxim Technologies, Inc.
Date: 2004.07.30 16:43:25 -05'00'

Charles Durrett
Office Manager

Cc: Mr. Ken Andersen, ConocoPhillips
Mr. Neal Goates, ConocoPhillips
Mr. Paul Evans, U.S. Bureau of Land Management


07/22/2004

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

August 4, 2004

Conoco Phillips
Attn: Neal Goates
600 N. Dairy Ashford
Houston TX 77252-2197

Re: Work Plan Approval
Lusk Discharge Line Release - Dated: July 30, 2004
UL-I, Sec 32-T18S-R35E

The remediation work plan referenced above and submitted to the New Mexico Oil Conservation Division (OCD) for ConocoPhillips by Maxim Technologies is **hereby approved** with the following conditions:

1. ConocoPhillips shall adhere to OCD rules and "Guidelines", (TPH conc. <1,000 mg/Kg).
2. ConocoPhillip shall split closure samples and submit at least two split samples to at least two laboratories.
3. ConocoPhillips shall notify OCD upon completion of excavation for inspection of delineation.
4. ConocoPhillips shall notify OCD at least 48-hr. prior to application of chemicals, closure sampling ~~or~~ backfilling.
and Δ RUS seefile

Please be advised that OCD approval of this plan does not relieve ConocoPhillips of liability should their operations fail to adequately investigate and remediate contaminants that threaten ground water, surface water, human health or the environment. In addition, OCD approval does not relieve ConocoPhillips of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions or need assistance please write or call: (505) 393-6161, ext. 113, or e-mail: psheeeley@state.nm.us

Sincerely,

Paul Sheeley-Environmental Engineer
Cc: Roger Anderson - Environmental Bureau Chief
Chris Williams - District I Supervisor
William Olson - OCD Hydrologist
Larry Johnson - Environmental Engineer

Sheeley, Paul

From: Cwdurrett1@aol.com
Sent: Friday, July 30, 2004 4:06 PM
To: psheeley@state.nm.us; paul_evans@nm.blm.gov; Cwilliams@state.nm.us
Cc: neal.goates@conocophillips.com; ken.n.andersen@conocophillips.com; cyancey@maximusa.com
Subject: ConocoPhillips - Lusk Discharge Line Work Plan

073004 Lusk L OCD Letter.pd

called 8.3.04 14:41
left message for Charlie
Score 10 = 1000 TPH

Lusk Discharge Line Release - Path Forward
Location SE Qtr, Sec 31, T 17, R 32 E

Attached is a work plan to excavate and backfill the Lusk DL petroleum hydrocarbon release site. If you approve, ConocoPhillips has authorized Maxim to initiate the work. If you have any questions concerning this work plan, please call me.

Please acknowledge receipt of this e-mail.

Sincerely,

Charlie Durrett
Maxim Technologies
1703 W. Industrial Ave.
Midland, TX 79701
P 432-686-8081
F 432-686-8085