22 June 2007

Mr. Larry Johnson Environmental Engineer Specialist New Mexico Oil Conservation Division 1625 North French Drive Hobbs, NM 88240

RE: Delineation Proposal – State C-20 #1 Flow Line NMOCD 1RP #1434 (API # 30025047260000); EPI Ref. #150022 UL-D (NW¼ of the NW¼) of Section 20, Township 21 South, Range 36 East Latitude N 32° 28' 08.93" and Longitude W 103° 17' 32.88"

Dear Mr. Johnson:

On 23 December 2005, a release from a 2-inch steel flowline occurred. The release consisted of approximately 23 barrels of crude oil and produced water of which none was recovered. ConocoPhillips retained Environmental Plus, Inc. (EPI) in June 2006 to delineate the extent of impacted soil at the site. This letter report documents site assessment and recommends further delineation via soil boring.

Site Background

The site is located in the NW¼ of the NW¼ of Section 20, Township 21 South, Range 36 East at an elevation of approximately 3,626 feet above mean sea level (reference Figures 1 and 2). The property is owned by the State of New Mexico and administered by the New Mexico State Land Office. A search for area water wells was completed utilizing the New Mexico Office of the State Engineers website and a database maintained by the United States Geological Survey (USGS). A total of thirteen (13) wells were recorded in the databases searched. The well identified as USGS #5 was found to be located within a 1,000-foot radius of the release location (reference Table 1 and Figure 2). Based on available information, it was determined that the distance between the contamination and groundwater was over 100 feet. Utilizing this information, it was determined that the New Mexico Oil Conservation Division (NMOCD) Remedial Goals for this site are as follows:

Parameter	Remedial Goal
Benzene	10 parts per million
BTEX	50 parts per million
ТРН	100 parts per million

**Chloride and Sulfate residuals may not be capable of impacting groundwater above NMWQCC of 250 mg/L and 600 mg/L, respectively

Field Work

EPI field personnel conducted an initial site assessment of 9 June 2006 to photograph and document the extent of the release. Based on the initial site assessment, the release consisted of approximately 1,400-square feet of pasture to an unknown depth.

P.O. Box 1558 ··· 2100 AVENUE O ··· EUNICE. NEW MEXICO 88231

Recommendations

Based on initial site assessment activities, it is recommended the site be delineated via a soil boring (or test trench) advanced within the release area near the point of release and an additional soil boring (or test trench) approximately 45-feet to the southwest (reference *Figure 4*). Soil samples should be collected at the surface, 2-foot and 5-foot bgs initially and at 5-foot intervals thereafter until two (2) consecutive samples are below remedial threshold/goals. Remedial threshold/goals will be determined in the field utilizing a portion of each sample for organic vapor and chloride concentration analyses. The remaining portion will be submitted to an independent laboratory for verification of total petroleum hydrocarbons (TPH); benzene, toluene, ethylbenzene and total xylenes (BTEX constituents); chlorides and sulfates. A remediation proposal will be developed upon receipt of laboratory analytical data.

Should you have any questions or concerns, please feel free to contact me at (505) 394-3481 or via e-mail at <u>jstegemoller@envplus.com</u>. Upon your approval, EPI will initiate delineation activities. Official correspondence should be submitted to:

Mr. Jesse Sosa ConocoPhillips Corporation 1410 West County Road Hobbs, NM 88240 (505) 391-3126 jesse.a.sosa@conocophillips.com

Sincerely,

ENVIRONMENTAL PLUS, INC.

Javor Megenish

Jason Stegemoller

Environmental Scientist

cc: John Abney, ConocoPhillips – Hobbs, NM

Jesse Sosa, ConocoPhillips – Hobbs, NM

Thaddeus Kostrubala, NMSLO - Sante Fe, NM

Myra Meyers, NMSLO - Hobbs, NM

Dasco Cattle Company, LLC., Agricultural Lessee – Tatum, NM

File

encl. Figure 1 – Area Map

Figure 2 – Site Location Map

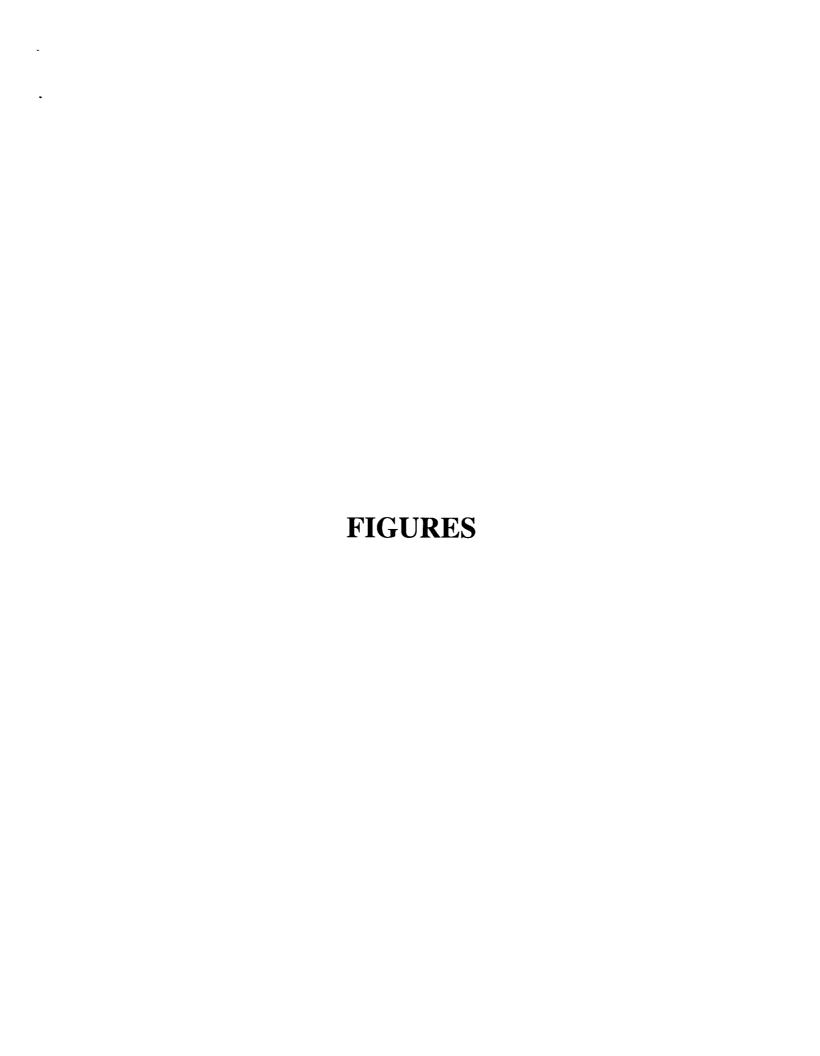
Figure 3 –Site Map

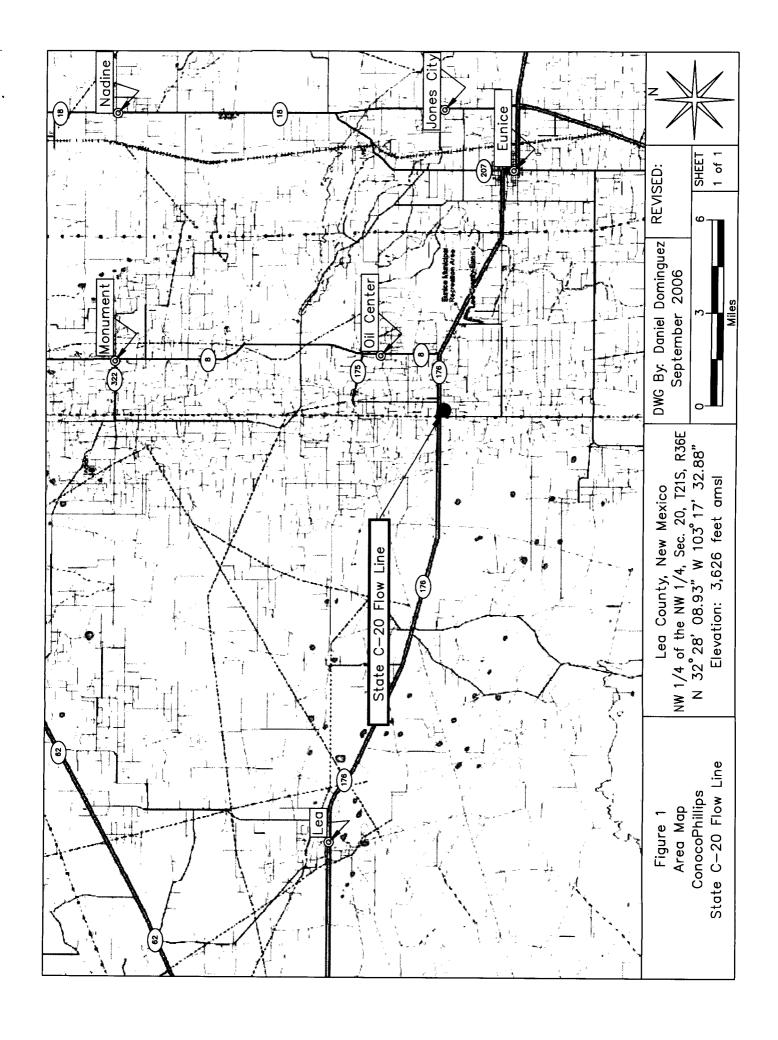
Figure 4 – Proposed Soil Boring Location Map

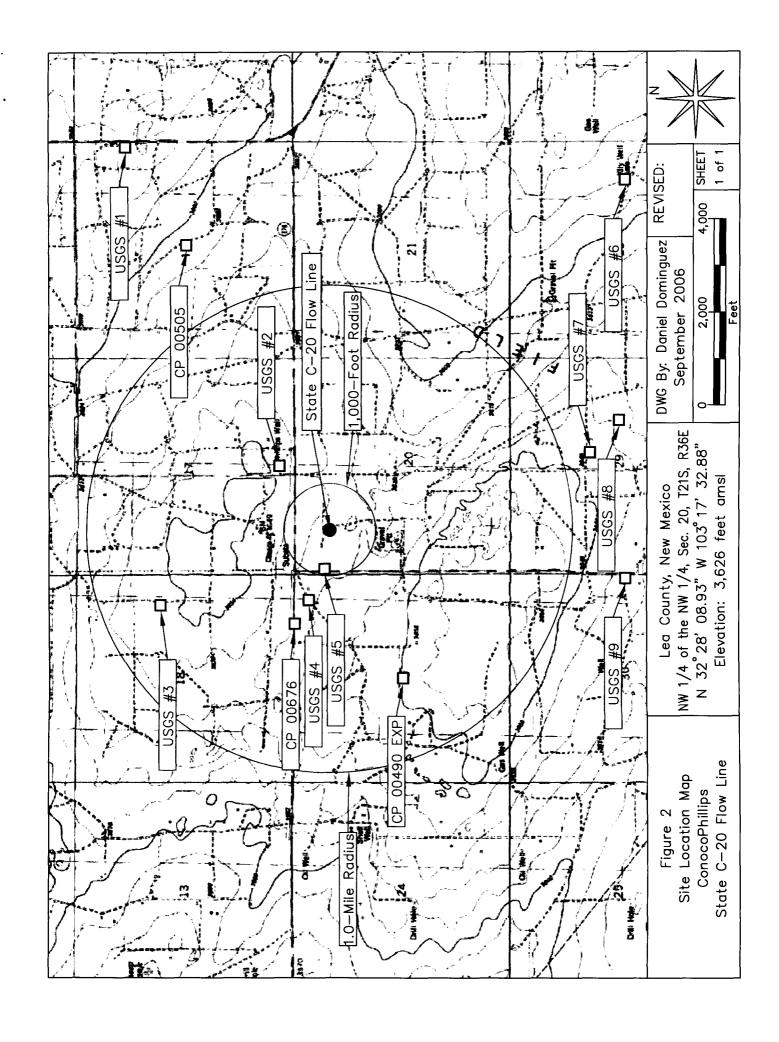
Table 1 – Well Information Report

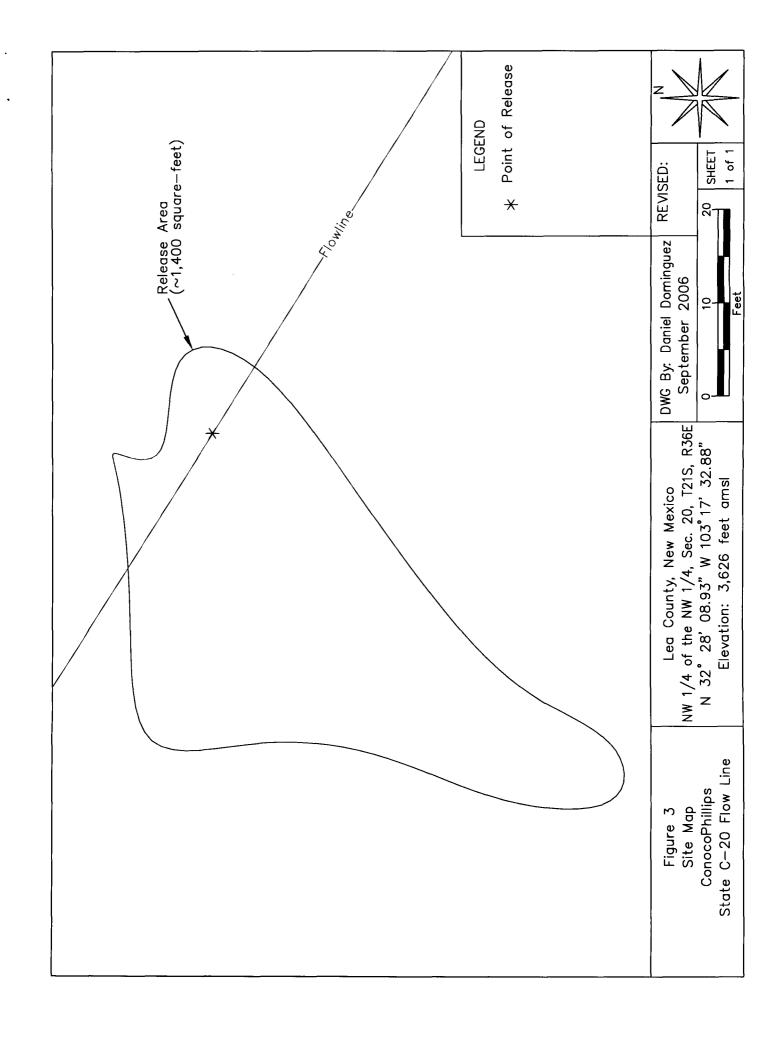
Attachment I – Informational Copy of Initial C-141

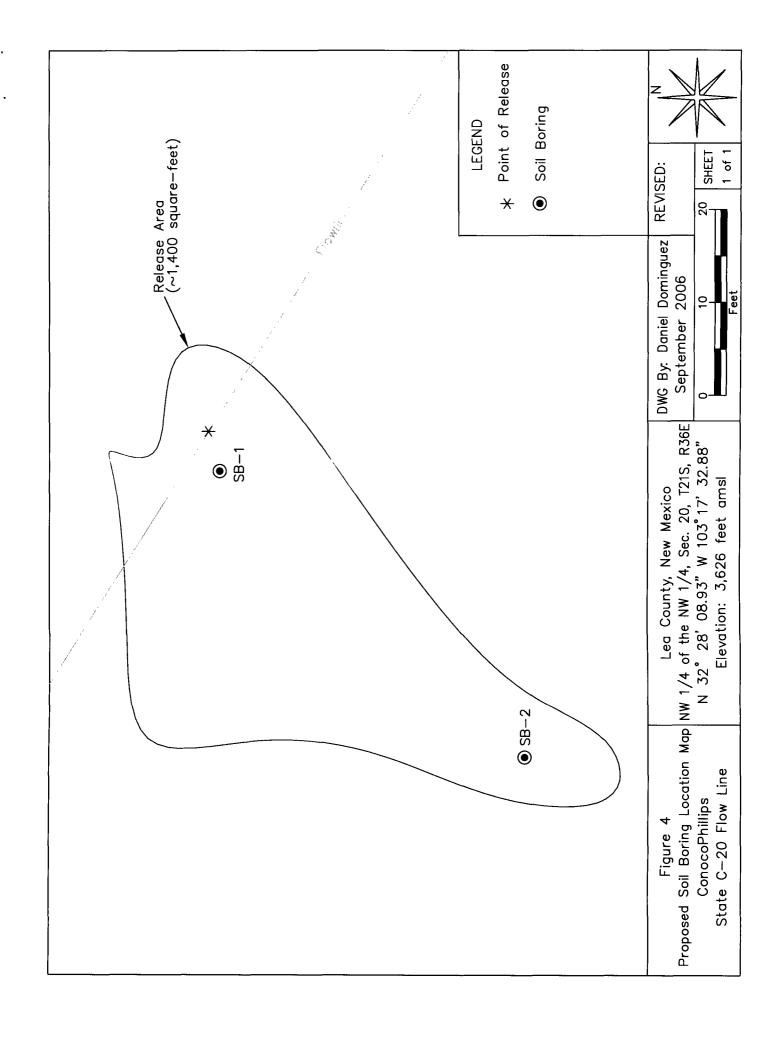
Attachment II – Site Photographs











TABLES

TABLE 1 Well Data

Conoco Phillips - State C-20 Flow Line (Ref. # 150022)

	Well Number Diversion ^A	Owner	Use	Twsp	Rng	Use Twsp Rng Sec q q q	Latitude	Longitude	Date Measured	Surface Elevation ^B	Depth to Water
1											(ft bgs)
	3	SNYDER RANCHES LTD.	STK	21S	36E	36E 16 2	N32° 28' 43.53"	W103° 16' 11.43"	10-Jul-72	3,605	195
CP 00676	0	JOE E. SIMS	DOM	218	36E	36E 18 441	N32° 28' 17.46"	W103° 17' 59.37"	30-Apr-93	3,630	106
CP 00490 EXP	0	U. R. CATTLE CO.	STK	218	36E	36E 19 23	N32° 27' 51.41"	W103° 18' 14.75"		3,650	
				21S	36E	36E 16 224			31-Jan-91	3,575	174.98
				21S	36E	36E 17 433			07-Mar-96	3,649	242.65
				218	36E	36E 18 241			07-Feb-96	3,646	233.83
				218	36E	36E 19 221			18-Mar-86	3,626	217.34
				218	36E	36E 20 113			07-Jan-54	3,626	215.96
				218	36E	36E 28 421			15-Feb-96	3,580	186.14
				218	36E	36E 29 231			06-Apr-91	3,645	246.87
				21S	36E	36E 29 234			08-Sep-70	3,639	240.89
				21S	36E	36E 30 422			13-Feb-96	3,635	230.69
	0	ROSS ROBINSON-	MIK	\$12			N32° 26' 46.81"	NROP 20146801		3,620	

A = in acre feet per annum

B = Blevation interpolated from USGS topographical map based on referenced location

DOM = 72-12-1 Domestic one household

STK = 72-12-1 Livestock watering

quarters are 1=NW, 2=NE, 3=SW, 4=SE; quarters are biggest to smallest

Shaded areas indicate wells not shown on Figure 2

ATTACHMENT I SITE PHOTOGRAPHS



Photo #1 – Looking northeasterly across point of release and overspray area.



Photo #2 – Looking northeasterly across release area.

ATTACHMENT II INFORMATIONAL COPY OF INITIAL C-141

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

Form C-141 Revised October 10, 2003

Release Notification and Corrective Action

						OPERA'	TOR	X	Initi	al Report		Final	Repon
Name of Company ConocoPhillips Company						Contact John Abney							
Address 4001 Penbrook Street Odessa, TX 79762						Telephone No. (505)391-3128							
Facility Name State C-20 Well #1						Facility Type Oil Well							
Surface Ox	mer State o	of New Mexi	co	Mineral ()wnerS	State of New Mexico Lease No. 13P 1434							
Barace On	HOI State (······································					AF i	3002			<u> </u>
FF '47 44	[C .:	T 1.	T. D			N OF RE	,	/ T 4637	77 '	3000	504	† 71 8	0000
Unit Letter D	Section 20	Township 21S	Range 36E	Feet from the	North	North/South Line Feet from the East/West Line County Lea							
					a .	}]					
Latitude 32° 28.14/N Longitude 103° 17.540W													
				NAT	URE	OF REL							
Type of Rele						Volume of Release23 BBLs Volume Recovered 0							
Source of Re						Date and Hour of Occurrence 12/23/05at 2and Hour of Discovery 12/23/05 9and							
Was Immedia	ate Notice (Yes 🗌	No 🛛 Not Re	equired	If YES, To Whom?							
By Whom?						Date and H	four NA		-				
Was a Watercourse Reached?						If YES, Volume Impacting the Watercourse.							
☐ Yes ☒ No						NA							
A 2" steel fl Describe Area	Describe Cause of Problem and Remedial Action Taken.* A 2" steel flowline leaked and no fluid was recovered. Describe Area Affected and Cleanup Action Taken.*											nte	
determine ti	At 9:30 am COPC MSO Jesse Sosa received a call from the Answering Service that a third party had found a flowline leak on the State C-20 lease it was confirmed that the line went to the #1 well and the well was shut in. A temporary clamp was placed on the line until the joint of pipe can be replaced. The affected area is 13' X 80' X 24" and no fluid was recovered. The site will be delineated to determine the necessary cleanup procedures.												
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.											y		
Al Monard						OIL CONSERVATION DIVISION							
Printed Name: John Abney A						Approved by District Supervisor							
Title: SHEaR Specialist A						Approval Date: (- Z 7 · O 7 Expiration Date: & · Z (· O 7							
E-mail Address: john.h.abney@conocophillips.com						Conditions of Approval:							
Date: 12/24/2005 Phone: (505)391-3128							Submit France CAI a						
Attach Additional Sheets If Necessary ATTACHED DOCUMENTATION 54													