

**1RP-1165**

**General Correspondence**

**YEAR(S): 2006-2010**

## VonGonten, Glenn, EMNRD

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**From:** Durrett, Charles [Charles.Durrett@tetratech.com]  
**Sent:** Monday, February 11, 2008 7:01 AM  
**To:** VonGonten, Glenn, EMNRD  
**Subject:** ConocoPhillips Warren Unit 1RP 1165 - Request for Guidance

Mr. VonGonten, I am seeking guidance concerning a mixed crude oil/produced water release. New data indicates that only chloride has affected groundwater.

- Do we now work with Santa Fe or continue to work with District 1?
- Would this require an abatement plan?

**Charles Durrett | Office and Project Manager**

Main: 432.686.8081 | Fax: 432.686.8085  
[charles.durrett@tetratech.com](mailto:charles.durrett@tetratech.com)

Tetra Tech | Complex World, Clear Solutions™  
1703 W. Industrial Ave. | Midland, TX 79701 | [www.tetratech.com](http://www.tetratech.com)

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3/19/2008

**VonGonten, Glenn, EMNRD**

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**From:** Durrett, Charles [Charles.Durrett@tetrattech.com]  
**Sent:** Monday, February 11, 2008 10:03 AM  
**To:** Wyane.Price@state.nm.us  
**Cc:** Johnson, Larry, EMNRD; jesse.a.sosa@conocophillips.com;  
Tom.R.Wynn@conocophillips.com; VonGonten, Glenn, EMNRD  
**Subject:** ConocoPhillips WUBT Battery 1 - C141 1RP1165 - Chloride on Groundwater  
**Attachments:** C141.072207.pdf

WUBT Battery 1  
Unit H, Sec 33, T20S, R38E  
Lea County, NM  
C141 1RP 1165

A previously reported mixed crude oil / produced water release has been found to have affected groundwater. A verbal report was recently made to your voice mail. Attached is the C141 that was originally submitted for the release.

Tetra Tech will be developing an abatement plan for submittal to NMOCD Santa Fe for review and approval. If you have any questions, please call me or Mr. Tom Wynn (ConocoPhillips, 918-661-0310).

Respectfully,

Charles Durrett | Office and Project Manager  
Main: 432.686.8081 | Fax: 432.686.8085  
[charles.durrett@tetrattech.com](mailto:charles.durrett@tetrattech.com)

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3/19/2008

## VonGonten, Glenn, EMNRD

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**From:** Durrett, Charles [Charles.Durrett@tetrattech.com]  
**Sent:** Monday, February 11, 2008 6:54 AM  
**To:** VonGonten, Glenn, EMNRD  
**Cc:** Price, Wayne, EMNRD  
**Subject:** FW: ConocoPhillips Vacuum Glorietta Abatement Plan

Gentlemen, I'm checking on the status of the proposed abatement plan we submitted to NMOCD, on behalf of ConocoPhillips, in October. With your permission, we would like to move forward on completing the work, while you complete your review.

Respectfully,

Charles Durrett | Office and Project Manager  
Main: 432.686.8081 | Fax: 432.686.8085  
[charles.durrett@tetrattech.com](mailto:charles.durrett@tetrattech.com)

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**From:** Durrett, Charles  
**Sent:** Mon 12/3/2007 1:33 PM  
**To:** WPrice@state.nm.us  
**Cc:** Tom.R.Wynn@conocophillips.com; Pope, Greg -- MTI  
**Subject:** ConocoPhillips Vacuum Glorietta Abatement Plan

Mr. Price, I called your office this morning to check on the status of the proposed abatement plan we submitted on behalf of ConocoPhillips. I know you and your folks are as busy as we are, so any information I could pass along to ConocoPhillips would be welcome.

Respectfully,

Charles Durrett | Office and Project Manager  
Main: 432.686.8081 | Fax: 432.686.8085  
[charles.durrett@tetrattech.com](mailto:charles.durrett@tetrattech.com)

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3/19/2008

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

Form C-141  
Revised October 10, 2003

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

### Release Notification and Corrective Action

<b>OPERATOR</b>		<input checked="" type="checkbox"/> Initial Report	<input type="checkbox"/> Final Repo
Name of Company: Enterprise Field Services LLC		Contact Don Fernald	
Address 614 Reilly Avenue <u>FARMINGTON, NM 87401</u>		Telephone No. 505-599-2141	
Facility Name Blanco Storage		Facility Type Storage	
Surface Owner Enterprise		Mineral Owner N/A	Lease No. N/A

LOCATION OF RELEASE								
Unit Letter	Section 14	Township 29N	Range 11W	Feet from the <u>W 1/4 Sec 14</u>	North/South Line	Feet from the	East/West Line	County San Juan

Latitude 36 degrees 43' 54.9" North Longitude 107 degrees 57' 56.91" West

NATURE OF RELEASE		
Type of Release Historical / Unknown	Volume of Release Unknown	Volume Recovered none to date
Source of Release Unknown	Date and Hour of Occurrence	Date and Hour of Discovery
Was Immediate Notice Given? <u>w/in 24 hrs.</u>	If YES, To Whom? Brandon Powell	
By Whom? Don Fernald	Date and Hour 10/31/06 - 3:00 PM	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\* N/A

Describe Cause of Problem and Remedial Action Taken.\*

Operations discovered that the bottom portion of a secondary containment had staining from hydrocarbons. The tank within the containment was removed, placed on skids and filled with water to determine if it was leaking. The tank did not have any leaks. Hydrocarbon impacts surfacing within and outside of the containment may be surfacing due to the recent heavy precipitation in the area. Enterprise is currently taking steps to determine the extent, nature and origin of the hydrocarbon impacted soils.

Describe Area Affected and Cleanup Action Taken.\*

The area affected is not known at this time. Surface staining is apparent in approximately 500-600 square feet.

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: <u>[Signature]</u>		<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Don Fernald		Approved by District Supervisor:	
Title: Environmental Scientist		Approval Date:	Expiration Date:
E-mail Address: dferald@eprod.com		Conditions of Approval:	
Date: October 31, 2006 Phone: 505-599-2141		Attached <input type="checkbox"/>	

\* Attach Additional Sheets If Necessary

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

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

☒ Initial Report ☐ Final Report

Name of Company Navajo Pipeline	Contact <input type="checkbox"/> Johnny Lackey
Address 311 West Quay, Artesia, NM 88210	Telephone No. <input type="checkbox"/> 505-748-8942
Facility Name Hobbs Tank Farm	Facility Type <input type="checkbox"/> Crude Oil Storage

Surface Owner	Mineral Owner	Lease No. <input type="checkbox"/> N/A
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#### LOCATION OF RELEASE

Unit Letter	Section NE 1/4 Sec 22	Township 19S	Range 38E	Feet from the	North/South Line	Feet from the	East/West Line	County
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#### NATURE OF RELEASE

Type of Release Crude Oil	Volume of Release	Volume Recovered <input type="checkbox"/>
Source of Release Pipeline leak	Date and Hour of Occurrence 7/22/04, unknown	Date and Hour of Discovery 7/22/04, 2:00pm
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Gary Wink	
By Whom? <input type="checkbox"/> Johnny Lackey, Holly Energy Partners	Date and Hour <input type="checkbox"/> 7/22/04, 4:45pm	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*


Describe Cause of Problem and Remedial Action Taken.\*

The 6" unloading line from the truck unloading rack to Tank 5201 developed a leak inside the tank retaining dike. The line was blocked in at the tank, line depressured and a clamp was installed at the leak. Leak was a result of external corrosion.

Describe Area Affected and Cleanup Action Taken.\*

An area approximately 4 feet wide and 20 feet long and 18 feet deep was stained with crude oil. There was no free liquid. Stained soil will be dug out and disposed of at permitted disposal site and fresh dirt placed in the excavated area.

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: _____		<b>OIL CONSERVATION DIVISION</b>	
		Approved by <input type="checkbox"/> District Supervisor:	
Printed Name: Johnny Lackey			
Title: Safety/Environmental Supervisor		Approval Date:	Expiration Date:
Date: 10/11/04	Phone: 505-748-8942	Conditions of Approval:	Attached <input type="checkbox"/>

\* Attach Additional Sheets If Necessary

## VonGonten, Glenn, EMNRD

---

**From:** Durrett, Charles [Charles.Durrett@tetrattech.com]  
**Sent:** Monday, February 11, 2008 8:53 AM  
**To:** VonGonten, Glenn, EMNRD  
**Cc:** Price, Wayne, EMNRD  
**Subject:** RE: ConocoPhillips Warren Unit 1RP 1165 - Request for Guidance

A C141 (1RP 1165) was filed with District 1 at the time of the release. Tetra Tech is replacing a consultant that did the initial work and we will follow up with the information you indicated. The chloride concentration in groundwater is above 250 mg/L.

Charles Durrett | Office and Project Manager

Main: 432.686.8081 | Fax: 432.686.8085  
[charles.durrett@tetrattech.com](mailto:charles.durrett@tetrattech.com)

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**From:** VonGonten, Glenn, EMNRD [mailto:Glenn.VonGonten@state.nm.us]  
**Sent:** Mon 2/11/2008 7:22 AM  
**To:** Durrett, Charles  
**Cc:** Price, Wayne, EMNRD  
**Subject:** RE: ConocoPhillips Warren Unit 1RP 1165 - Request for Guidance

Charles,

Any release is that impacts ground water must be reported to the Environmental Bureau Chief in Santa Fe, both verbally and in writing, pursuant to OCD Rule 116 (19.15.3.116 NMAC, RELEASE NOTIFICATION AND CORRECTIVE ACTION). The written report must be on OCD Form C-141 (available at <http://www.emnrd.state.nm.us/oed/Forms.htm>). If the ground water impact exceeds the WQCC Standards specified at 20.6.2.3103 NMAC, then OCD will require the operator to submit an Abatement Plan pursuant to OCD Rule 19 (19.15.1.19 NMAC).

Your client should submit the information required on OCD Form C-141 and should include a site map depicting the particulars of the spill, a narrative of all actions taken to date, and all analytical data.

Please call me at 505-476-3488 if you have any questions.

Glenn

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**From:** Durrett, Charles [mailto:Charles.Durrett@tetrattech.com]  
**Sent:** Monday, February 11, 2008 7:01 AM  
**To:** VonGonten, Glenn, EMNRD  
**Subject:** ConocoPhillips Warren Unit 1RP 1165 - Request for Guidance

3/19/2008

Mr. VonGonten, I am seeking guidance concerning a mixed crude oil/produced water release. New data indicates that only chloride has affected groundwater.

- Do we now work with Santa Fe or continue to work with District 1?
- Would this require an abatement plan?

**Charles Durrett | Office and Project Manager**

Main: 432.686.8081 | Fax: 432.686.8085

[charles.durrett@tetrattech.com](mailto:charles.durrett@tetrattech.com)

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3/19/2008



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nd II  
61 W. Grand Avenue, Artesia, NM 88206  
strict III  
00 Rio Puerco Road, Aztec, NM 87410  
strict IV  
20 S. El Phantas 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 October 10, 2003

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

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company ConocoPhillips Company Contact John Abney  
Address 4001 Penbrook Street Odessa, TX 79762 Telephone No. (505)391-3128  
Facility Name WUBT Battery 1 Facility Type Oil well flow line

Surface Owner Bob McClasland Mineral Owner ELM Lease No. LC 631695B

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
II	33	20S	38E					Lea

Latitude 32-31.784N Longitude 103-08.867W

NATURE OF RELEASE

Type of Release	Volume of Release	Volume Recovered
<u>Crude Oil and Produced water</u>	<u>17 bbls</u>	<u>10 bbls</u>
Source of Release <u>Flow line</u>	Date and Hour of Occurrence <u>3/10/05 4p</u>	Date and Hour of Discovery <u>3/10/05 4p</u>
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom? <u>NA</u>	
By Whom? <u>NA</u>	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. <u>NA</u>	

a Watercourse was Impacted, Describe Fully.  
NA

Describe Cause of Problem and Remedial Action Taken.  
Operator discovered oil coming out of conduit under that runs under the Railroad Tracks. Upon discovery the operator shut in all of the wells with lines that run through this conduit and opened them one at a time until he determined which line had the leak. The site will be delineated to determine necessary remediation requirements.

Describe Area Affected and Cleanup Action Taken.  
The affected area is 27' X 45' and has been fenced off until remediation can take place. A vacuum truck was used to pickup the free standing fluids.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCED 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 NMOCED 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, NMOCED 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.

OIL CONSERVATION DIVISION	
Signature: <u>John Abney</u>	Approved by District Supervisor <u>[Signature]</u>
Printed Name: <u>John Abney</u>	Approval Date: <u>5-22-07</u> Expiration Date: <u>7-22-07</u>
Title: <u>SHEAR Specialist</u>	Conditions of Approval: <u>SUBMIT FINAL C-141</u>
Email Address: <u>john.h.abney@conocophillips.com</u>	Attached <input type="checkbox"/>
Date: <u>3/11/2005</u> Phone: <u>(505)391-3128</u>	
Attach Additional Sheets If Necessary	

No. 0790

HOBBS NM

CONOCOPHILLIPS

Oct. 14, 2005 9:57AM

Application - PAC0714349319

RP#1165