



CONOCOPHILLIPS

P.O. Box 2197
Houston, TX 77252-2197
Phone 281.293.1000

James E Federal Upper Battery (2RP-2197)

Corrective Action Plan

API No. 30-015-26645

Release Date: January 29th, 2014

Unit Letter E, Section 12, Township 22S, Range 30E

November 20th, 2014

Mike Bratcher

New Mexico Energy, Minerals, & Natural Resources
Oil Conservation Division, Environmental Bureau – District 2
811 S. First St.
Artesia, NM 88210

**RE: Corrective Action Plan
ConocoPhillips James E Federal Upper Battery (2RP-2197)
UL/E sec. 12 T22S R30E
API No. 30-015-26645**

Mr. Bratcher:

ConocoPhillips (CoP) has retained Rice Environmental Consulting and Safety (RECS) to address potential environmental concerns at the above-referenced site.

Background and Previous Work

The site is located approximately 22.7 miles east of Carlsbad, New Mexico at UL/E sec. 12 T22S R30E. USGS records indicate that groundwater will likely be encountered at a depth of approximately 150 +/- feet.

On January 29th, 2014, the air compressor supplying the dump control failed, causing the dump controllers to be inactive to incoming fluids. The liquid levels in the production vessel rose and pushed production fluids over the top into the sales gas line. The facility vent opened and sent fluids into the emergency overflow tank. The overflow tank itself overflowed and released 61.58 barrels of oil over 6,802 square feet of bermed battery lease pad and pasture land. A vacuum truck was called to the site and recovered 60 barrels of oil. NMOCD was notified of the release on January 30th, 2014, and CoP submitted an initial C-141 to NMOCD for their approval. NMOCD approved the initial C-141 on March, 12th, 2014 (Appendix A).

CoP scraped up the wet material in the pasture and disposed on the soil at a NMOCD approved facility. RECS personnel were on site beginning on September 5th, 2014, to assess the release (Figure 1). A five point composite was taken within the 6 inch scraped release area in the pasture. The composite was field sampled for chlorides and organic vapors, and the sample was then taken to a commercial laboratory for analysis. The composite returned a laboratory chloride reading of 80 mg/kg, a Diesel Range Organics (DRO) reading of 1,430 mg/kg, and a Gasoline Range Organics (GRO) reading and a BTEX reading of non-detect (Appendix B).

Photo documentation of the release area can be found in Appendix C.

Corrective Action Plan

To remediate the remainder of the release, the overflow tank and surrounding berm will be removed. The area formerly encompassed by the berm will be scraped down to 1 ft bgs. The excavated soil will be taken to a NMOCD approved facility for disposal. Clean caliche will be imported to the site to serve as backfill and to construct berms. The imported caliche will be used to replace the surrounding berms to a height that will be properly sized for the new overflow tank. At the base of the 1 ft bgs scrape, a 40 mil- reinforced poly liner will be installed and properly seated. The liner will extend up and over the surrounding berms. Clean top soil will be imported to the site to pad the liner and backfill the pasture area. A sample of the imported backfill will be taken to a commercial laboratory to confirm that the chloride value is below regulatory standards.

The liner will be padded with top soil to prevent punctures and the remainder of the scrape will be backfilled with caliche. Caliche will also be used to weigh down the liner as it goes over the berms. A new overflow tank will be placed on the site. The remainder of the contamination at on the lease pad will be remediated at site closure.

The scrape in the pasture will be backfilled with the imported top soil and contoured to the surrounding area. The disturbed area in the pasture will then be seeded with a blend of native vegetation.

Once these activities have been completed, a final report will be submitted to NMOCD and BLM requesting 'remediation termination' and site closure.

RECS appreciates the opportunity to work with you on this project. Please call Hack Conder at (575) 393-2967 or me if you have any questions or wish to discuss the site.

Sincerely,

A handwritten signature in dark ink, appearing to read 'J.C.W.' followed by a stylized flourish.

Lara Weinheimer
Project Scientist
RECS
(575) 441-0431

Attachments:

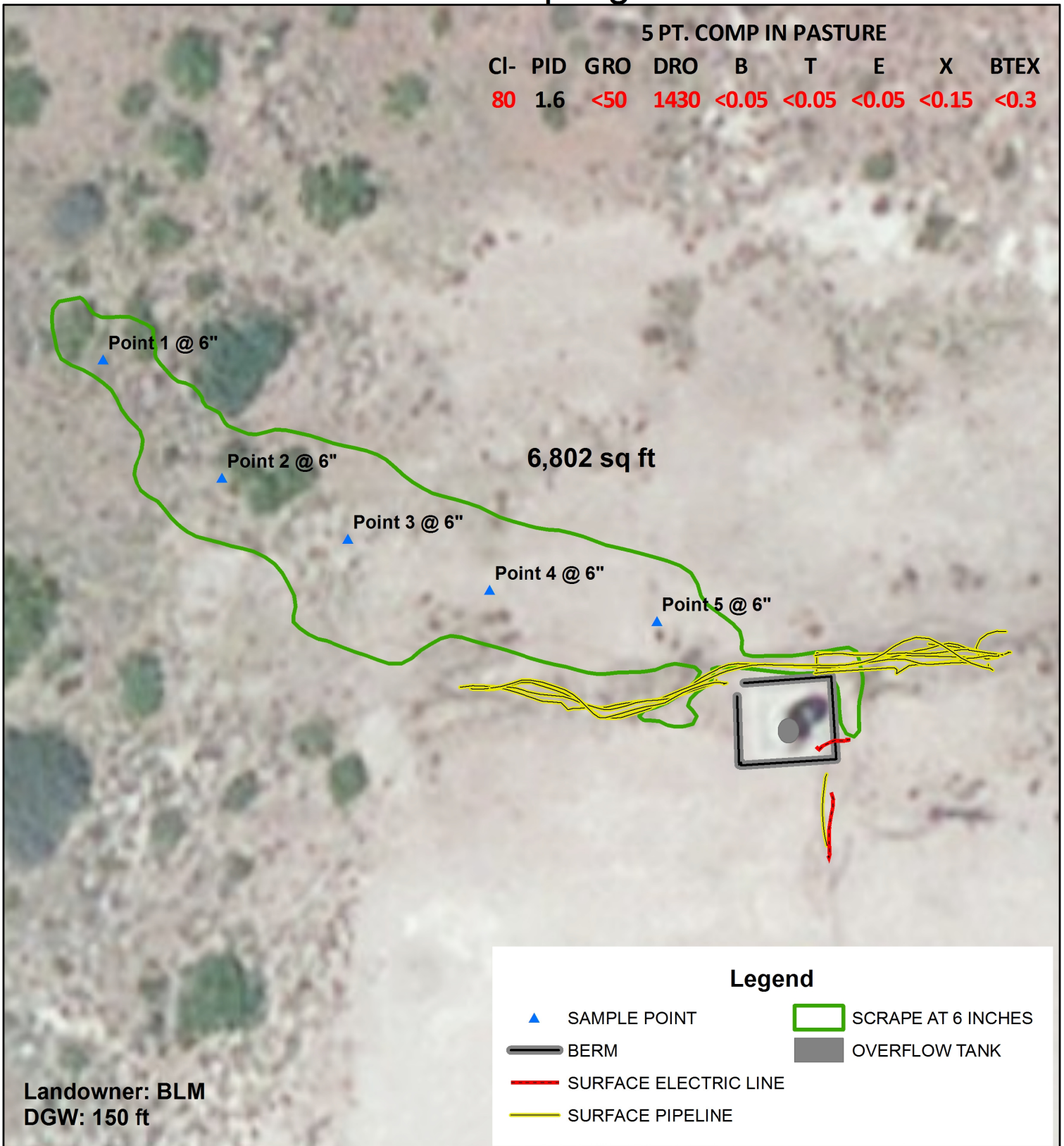
- Figure 1 – Initial Sampling Data
- Appendix A – Initial C-141
- Appendix B – Initial Sampling Lab
- Appendix C – Photo Documentation

Figures

Initial Sampling Data

5 PT. COMP IN PASTURE

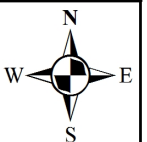
CI-	PID	GRO	DRO	B	T	E	X	BTEX
80	1.6	<50	1430	<0.05	<0.05	<0.05	<0.15	<0.3



CONOCOPHILLIPS
JAMES E FEDERAL
UPPER BATTERY

UL E SECTION 12
T-22-S R-30-E
EDDY COUNTY, NM

Figure 1



0 25 50
Feet

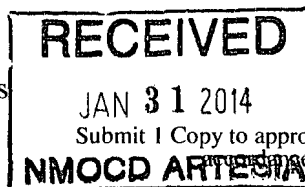
GPS date: 9/5/14 CF
Drawing date: 9/16/14
Drafted by: T. Grieco, L. Weinheimer

Appendix A

Initial C-141

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., 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 August 8, 2011

Release Notification and Corrective Action

nHMP140 712 7759

OPERATOR		<input checked="" type="checkbox"/> Initial Report	<input type="checkbox"/> Final Report
Name of Company: ConocoPhillips <u>217817</u>		Contact: Jose A Zepeda	
Address: 1410 N West County Road		Telephone No. 575-391-3165	
Facility Name: James E Federal Upper Battery		Facility Type: Battery	
Surface Owner: Federal Lease		Mineral Owner: N/A	API No. <u>30-015-26645-</u>

LOCATION OF RELEASE

Unit Letter	Section 12	Township 22S	Range 30E	Feet from the	North/South Line	Feet from the	East/West Line	County Eddy
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Latitude _____ Longitude _____

NATURE OF RELEASE

Type of Release: OIL	Volume of Release: 61.58	Volume Recovered: 60.00
Source of Release: Tank	Date and Hour of Occurrence 01/29/2014 ~0940am	Date and Hour of Discovery SAME
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Geoffrey Leking	
By Whom? Jose A Zepeda	Date and Hour: 01/30/2014 ~1107am Left Voice Mail	
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.* On 01/29/13 @ ~0940 @ the James E Upper Battery there was an accidental discharge. Air compressor supplying dumps control pressure failed causing dump controllers to not react to incoming fluids, liquid levels in production vessel rose and pushed production fluids over the top in to sales gas line. Facility vent opened sending fluids into the facility emergency overflow tank. Fluids breached top of the tank spilling in the dike area and onto local pasture. Diked area 25' x 27' x 2" equaling 61.25bbls affected pasture 180' x 4' x 0.5" equaling 0.33 bbls total fluids recovered by vacuum truck 60 bbls. Spill site will be remediated in accordance with COPC and NMOCD guidelines. The incident is under investigation.

Describe Area Affected and Cleanup Action Taken.*

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.

OIL CONSERVATION DIVISION	
Signature: <u>JOSE A ZEPEDA</u>	Approved by Environmental Specialist: <u>[Signature]</u>
Printed Name: Jose A Zepeda	Approval Date: <u>3/12/14</u> Expiration Date: _____
Title: LEAD HSE	Conditions of Approval:
E-mail Address: Jose. A. Zepeda@conocophillips.com	Remediation per OCD Rule & Guidelines, & like approval by BLM. SUBMIT REMEDIATION PROPOSAL NO LATER THAN: <u>4/12/14</u>
Date: 01/30/2014 Phone: 575-391-3158	Attached <input type="checkbox"/>

* Attach Additional Sheets If Necessary

2RP 2197

Appendix B

Initial Sampling Lab

RICE Environmental Consulting and Safety (RECS)
P.O. Box 2948 Hobbs, NM 88241
Phone 575.393.2967



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

September 15, 2014

LAURA FLORES

RICE ENVIRONMENTAL CONSULTING & SAFETY LLC

419 W. CAIN

HOBBS, NM 88240

RE: JAMES E FEDERAL UPPER BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 09/09/14 8:15.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive, flowing style.

Celey D. Keene

Lab Director/Quality Manager

Analytical Results For:

RICE ENVIRONMENTAL CONSULTING & SAFETY
LAURA FLORES
419 W. CAIN
HOBBS NM, 88240
Fax To: (575) 397-1471

Received:	09/09/2014	Sampling Date:	09/05/2014
Reported:	09/15/2014	Sampling Type:	Soil
Project Name:	JAMES E FEDERAL UPPER BATTERY	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	COP		

Sample ID: 5 PT. BOTTOM COMP @ 6" (H402788-01)

BTEX 8021B			mg/kg		Analyzed By: MS				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/11/2014	ND	2.01	100	2.00	5.47	
Toluene*	<0.050	0.050	09/11/2014	ND	1.81	90.3	2.00	5.66	
Ethylbenzene*	<0.050	0.050	09/11/2014	ND	1.66	83.0	2.00	5.76	
Total Xylenes*	<0.150	0.150	09/11/2014	ND	5.04	84.0	6.00	5.90	
Total BTEX	<0.300	0.300	09/11/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 106 % 89.4-126

Chloride, SM4500Cl-B			mg/kg		Analyzed By: AP				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	09/12/2014	ND	400	100	400	0.00	

TPH 8015M			mg/kg		Analyzed By: ms				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<50.0	50.0	09/11/2014	ND	177	88.3	200	1.34	
DRO >C10-C28	1430	50.0	09/11/2014	ND	200	100	200	3.79	

Surrogate: 1-Chlorooctane 96.0 % 65.2-140

Surrogate: 1-Chlorooctadecane 138 % 63.6-154

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories

*=Accredited Analyte

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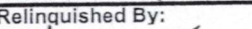



Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Relinquished By:		Date:	Received By:	Phone Result:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Phone #:
		9-9-2017		Fax Result:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Fax #:
Relinquished By:		Time:	Received By:	REMARKS:		
		8:15		email: hconder@riceswd.com; lflores@rice-ecs.com; lweinheimer@rice-ecs.com; knorman@rice-ecs.com; jkamplain@rice-ecs.com; sedwards@rice-ecs.com; cursanic@rice-ecs.com Environmental Tech:		
Delivered By: (Circle One)		Date:	Sample Condition	CHECKED BY:		
Sampler - UPS - Bus - Other:		Time:				
			Cool <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Intact <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

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Appendix C

Photo Documentation

RICE Environmental Consulting and Safety (RECS)
P.O. Box 2948 Hobbs, NM 88241
Phone 575.393.2967

ConocoPhillips James E Federal Upper Battery

Unit Letter E, Section 12, T22S, R30E



Initial release area, facing northeast 9/5/14



Initial release area, facing southeast 9/5/14



Initial release area, facing northeast 9/5/14



Initial release area, facing northeast 9/5/14