

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

30-039-07399

OPERATOR

☐ Initial Report

☒ Final Report

Name of Company	ConocoPhillips Company	Contact	Kelsi Harrington
Address	3401 E. 30 th St., Farmington, NM 87402	Telephone No.	505-599-3403
Facility Name	San Juan 28-7 Unit 9	Facility Type	Gas Well
		API #	3003907399
Surface Owner	Private	Mineral Owner	Federal
		Lease No.	SF-079289-A

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
M	14	28N	07W	890'	South	1090'	West	Rio Arriba

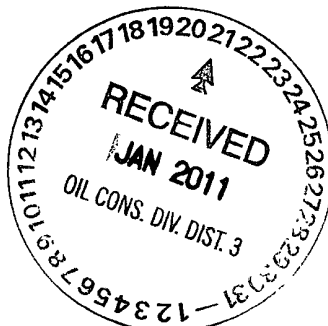
Latitude 36.65662° N Longitude -107.54779° W

NATURE OF RELEASE

Type of Release –	Unknown	Volume of Release –	Unknown	Volume Recovered –
Source of Release:	Below Grade Tank	Date and Hour of Occurrence	Unknown	Date and Hour of Discovery
				11/24/10
Was Immediate Notice Given?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?		
By Whom?		Date and Hour –		
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.* Below grade tank closure activities.				
Describe Area Affected and Cleanup Action Taken.* The below grade tank sample results were above regulatory standard by USEPA method 418.1 for TPH and Organic Vapors, confirming a release. The sample was then transported to the lab and analytical results were below the regulatory standards set forth in the NMOCD Guidelines for Remediation of Leaks, Spills and Release; therefore no further action is required.				
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:	Kelsi Harrington	OIL CONSERVATION DIVISION		
Printed Name:	Kelsi Harrington	Approved by District Supervisor: Jonathan D. Kelly		
Title:	Environmental Consultant	Approval Date: 11/22/2011 Expiration Date:		
E-mail Address:	kelsi.g.harrington@conocophillips.com	Conditions of Approval:		
Date:	1/19/11	Attached <input type="checkbox"/>		
Phone:	505-599-3403			

* Attach Additional Sheets If Necessary

nJK1132629997





December 20, 2010

Project No. 96052-1777

Ms. Kelsi Harrington
ConocoPhillips
3401 East 30th Street
Farmington, New Mexico 87401

Phone: (505) 599-3403

**RE: BELOW-GRADE TANK CLOSURE DOCUMENTATION FOR THE SAN JUAN 28-7 UNIT 9
WELL SITE, RIO ARriba COUNTY, NEW MEXICO**


Dear Ms. Harrington,

Enclosed please find the field notes and analytical results for below-grade tank (BGT) closure activities performed at the San Juan 28-7 Unit 9 well site located in Section 14, Township 28 North, Range 7 West, Rio Arriba County, New Mexico. Upon Envirotech personnel's arrival on November 24, 2010, one (1) five (5)-point composite sample was collected from beneath the former BGT. The sample was analyzed in the field for total petroleum hydrocarbons (TPH) using USEPA Method 418.1, for organic vapors using a photoionization detector (PID) and for chlorides. Additionally, the sample was placed into a four (4)-ounce glass jar, capped headspace free, and transported on ice, under chain of custody, to Envirotech's Analytical Laboratory to be analyzed for benzene and BTEX using USEPA Method 8021 and for total chlorides using USEPA Method 4500. The sample returned results below the regulatory standards for benzene, BTEX, and chloride but above the regulatory standard of 100 parts per million (ppm) TPH using USEPA Method 418.1, confirming a release did occur.

A brief site assessment was conducted and the regulatory standards were determined to be 5000 ppm TPH and 100 ppm organic vapors due to horizontal distance to surface water being greater than 1000 feet and depth to groundwater being greater than 100 feet, pursuant to New Mexico Oil Conservation Division (NMOCD) Guidelines for Remediation of Spills, Leaks, and Releases. The sample from beneath the former BGT returned results below the regulatory standard for benzene and BTEX using USEPA Method 8021 and TPH using USEPA Method 8015; see attached *Analytical Results*. Envirotech, Inc. recommends no further action in regards to this incident.

We appreciate the opportunity to be of service. If you have any questions or require additional information, please contact our office at (505) 632-0615.

Respectfully submitted,
ENVIROTECH, INC.



Barian Williamson
Senior Environmental Technician
bwilliamson@envirotech-inc.com

Enclosures: Field Notes
Analytical Results

Cc: Client File 96052

PAGE NO: <u>1</u> OF <u>1</u>	ENVIROTECH INC ENVIRONMENTAL SCIENTISTS & ENGINEERS 5796 U.S. HIGHWAY 64 - 3014 FARMINGTON, NEW MEXICO 87401 PHONE: (505) 632-0615	ENVIRONMENTAL SPECIALIST: <u>BWJ</u> LAT: <u>36.656613</u> LONG: <u>-107.547871</u>
DATE STARTED: <u>11-24-10</u>		
DATE FINISHED: <u>11-24-10</u>		

FIELD REPORT: BGT / PIT CLOSURE VERIFICATION

LOCATION: NAME: <u>San Juan 28-7</u>	WELL #: <u>9</u>	TEMP PIT: <u> </u>	PERMANENT PIT: <u> </u>	BGT: <u>X</u>
LEGAL ADD: UNIT: <u>M</u>	SEC: <u>14</u>	TWP: <u>28N</u>	RNG: <u>7W</u>	PM: <u> </u>
QTR/FOOTAGE: <u> </u>	CNTY: <u>Rio Arriba</u>	ST: <u>New Mexico</u>		

EXCAVATION APPROX: <u>10</u> FT. X <u>10</u> FT. X <u>4</u> FT. DEEP	CUBIC YARDAGE: <u> </u>
DISPOSAL FACILITY: <u>N/A</u>	REMEDICATION METHOD: <u>N/A</u>
LAND OWNER: <u>Federal</u>	API: <u>3003907399</u>
CONSTRUCTION MATERIAL: <u>Steel</u>	BGT / PIT VOLUME: <u> </u>
DOUBLE-WALLED, WITH LEAK DETECTION: <u>SW/SB</u>	

LOCATION APPROXIMATELY: <u>10.9</u> FT. <u>7.5</u> FROM WELLHEAD
DEPTH TO GROUNDWATER: <u>>500'</u> <u>1500' to SW</u> <u>Run to 5000+ ft</u>

TEMPORARY PIT - GROUNDWATER 50-100 FEET DEEP

BENZENE ≤ 0.2 mg/kg, BTEX ≤ 50 mg/kg, GRO & DRO FRACTION (8015) ≤ 500 mg/kg, TPH (418.1) ≤ 2500 mg/kg, CHLORIDES ≤ 500 mg/kg

TEMPORARY PIT - GROUNDWATER ≥100 FEET DEEP

BENZENE ≤ 0.2 mg/kg, BTEX ≤ 50 mg/kg, GRO & DRO FRACTION (8015) ≤ 500 mg/kg, TPH (418.1) ≤ 2500 mg/kg, CHLORIDES ≤ 1000 mg/kg

☒ PERMANENT PIT OR BGT

BENZENE ≤ 0.2 mg/kg, BTEX ≤ 50 mg/kg, TPH (418.1) ≤ 100 mg/kg, CHLORIDES ≤ 250 mg/kg

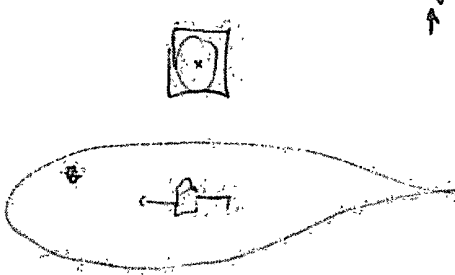
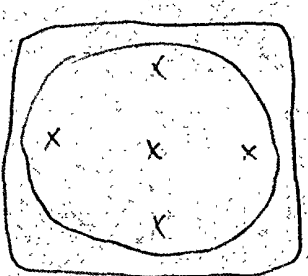
FIELD 418.1 ANALYSIS

TIME	SAMPLE ID	LAB NO.	WEIGHT (g)	mL FREON	DILUTION	READING	CALC. (mg/kg)
9:51	246 STD					258	
9:56	Sample #1	1	5	20 mL	1x	116	464
		2					
		3					
		4					
		5					
		6					

PERIMETER

FIELD CHLORIDES RESULTS

PROFILE

	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th>SAMPLE ID</th> <th>READING</th> <th>CALC. (mg/kg)</th> </tr> <tr> <td>1</td> <td>0.4</td> <td>< 25 ppm</td> </tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> </table>	SAMPLE ID	READING	CALC. (mg/kg)	1	0.4	< 25 ppm																			
SAMPLE ID	READING	CALC. (mg/kg)																								
1	0.4	< 25 ppm																								
PID RESULTS																										
SAMPLE ID	RESULTS (mg/kg)																									
	2035																									

LAB SAMPLES <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th>SAMPLE ID</th> <th>ANALYSIS</th> <th>RESULTS</th> </tr> <tr><td> </td><td>BENZENE</td><td> </td></tr> <tr><td> </td><td>BTEX</td><td> </td></tr> <tr><td> </td><td>GRO & DRO</td><td> </td></tr> <tr><td> </td><td>CHLORIDES</td><td> </td></tr> </table>	SAMPLE ID	ANALYSIS	RESULTS		BENZENE			BTEX			GRO & DRO			CHLORIDES		NOTES: <u>collected 1 BGT sample for 8015 8021 chloride</u> WORKORDER # <u> </u> WHO ORDERED <u> </u>
SAMPLE ID	ANALYSIS	RESULTS														
	BENZENE															
	BTEX															
	GRO & DRO															
	CHLORIDES															



**EPA METHOD 418.1
TOTAL PETROLEUM
HYDROCARBONS**

Client: ConocoPhillips
Sample No.: 1
Sample ID: 5 Pt. Composite
Sample Matrix: Soil
Preservative: Cool
Condition: Cool and Intact

Project #: 96052-1777
Date Reported: 12/20/2010
Date Sampled: 11/24/2010
Date Analyzed: 11/24/2010
Analysis Needed: TPH-418.1

Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
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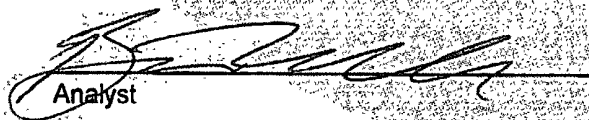
Total Petroleum Hydrocarbons	464	5.0
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ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: San Juan 28-7 Unit 9

Instrument calibrated to 200 ppm standard. Zeroed before each sample


Analyst

Barian Williamson
Printed


Review

Greg Crabtree, PE
Printed




CONTINUOUS CALIBRATION
EPA METHOD 418.1
TOTAL PETROLEUM
HYDROCARBONS

Cal. Date: 24-Nov-10

Parameter	Standard Concentration mg/L	Concentration Reading mg/L
TPH	100	
	246	258
	500	
	1000	

The accepted percent relative deviation (%RSD) of the calibration factor is less than 20% over the working range.


Analyst

12/20/2010
Date

Barian Williamson
Print Name


Review

12/20/2010
Date

Greg Crabtree, PE
Print Name



Field Chloride

Client: ConocoPhillips
Sample No.: 1
Sample ID: 5 Pt. Composite
Sample Matrix: Soil
Preservative: Cool
Condition: Cool and Intact

Project #: 96052-1777
Date Reported: 12/20/2010
Date Sampled: 11/24/2010
Date Analyzed: 11/24/2010
Analysis Needed: Chloride

Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
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Field Chloride

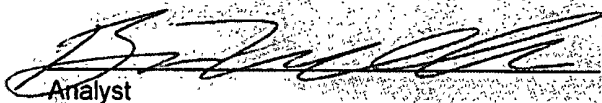
ND

28.0

ND = Parameter not detected at the stated detection limit.

References: "Standard Methods for the Examination of Water and Wastewater", 18th ed., 1992
Hach Company Quantab Titrators for Chloride

Comments: San Juan 28-7 Unit 9


Analyst

Barian Williamson

Printed


Review

Greg Crabtree, PE

Printed

Client:	ConocoPhillips	Project #:	96052-1777
Sample ID:	BGT Sample	Date Reported:	11-29-10
Laboratory Number:	56560	Date Sampled:	11-24-10
Chain of Custody:	10810	Date Received:	11-24-10
Sample Matrix:	Soil	Date Analyzed:	11-29-10
Preservative:	Cool	Date Extracted:	11-29-10
Condition:	Intact	Analysis Requested:	BTEX
		Dilution:	10

Parameter	Concentration (ug/Kg)	Det. Limit (ug/Kg)
Benzene	ND	0.9
Toluene	235	1.0
Ethylbenzene	71.9	1.0
p,m-Xylene	1,260	1.2
o-Xylene	336	0.9
Total BTEX	1,900	

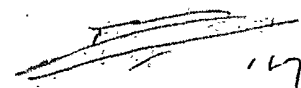
ND - Parameter not detected at the stated detection limit.

Surrogate Recoveries:	Parameter	Percent Recovery
	Fluorobenzene	101 %
	1,4-difluorobenzene	112 %
	Bromochlorobenzene	110 %

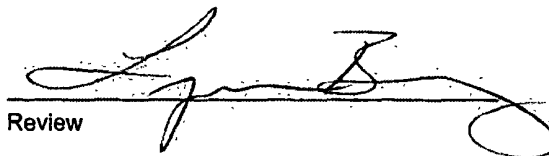
References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Method 8021B, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: San Juan 28-7 #9



Analyst



Review

Client:	N/A	Project #:	N/A
Sample ID:	1129BBLK QA/QC	Date Reported:	11-29-10
Laboratory Number:	56560	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	11-29-10
Condition:	N/A	Analysis:	BTEX
		Dilution:	10

Calibration and Detection Limits (ug/L)	I-Cal RF:	C-Cal RF:	%Diff:	Blank Conc	Detect Limit
		Accept. Range 0 - 15%			
Benzene	3.3501E+005	3.3569E+005	0.2%	ND	0.1
Toluene	3.7994E+005	3.8070E+005	0.2%	ND	0.1
Ethylbenzene	3.4829E+005	3.4898E+005	0.2%	ND	0.1
p,m-Xylene	8.2477E+005	8.2643E+005	0.2%	ND	0.1
o-Xylene	2.9394E+005	2.9453E+005	0.2%	ND	0.1

Duplicate Conc. (ug/Kg)	Sample	Duplicate	%Diff.	Accept Range	Detect Limit
Benzene	ND	ND	0.0%	0 - 30%	0.9
Toluene	235	222	5.6%	0 - 30%	1.0
Ethylbenzene	71.9	70.5	1.9%	0 - 30%	1.0
p,m-Xylene	1,260	1,310	4.0%	0 - 30%	1.2
o-Xylene	336	344	2.3%	0 - 30%	0.9

Spike Conc. (ug/Kg)	Sample	Amount Spiked	Spiked Sample	% Recovery	Accept Range
Benzene	ND	500	591	118%	39 - 150
Toluene	235	500	703	95.6%	46 - 148
Ethylbenzene	71.9	500	650	114%	32 - 160
p,m-Xylene	1,260	1000	2,610	116%	46 - 148
o-Xylene	336	500	895	107%	46 - 148

ND - Parameter not detected at the stated detection limit.

Dilution: Spike and spiked sample concentration represent a dilution proportional to sample dilution.

References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.
 Method 8021B, Aromatic and Halogenated Volatiles by Gas Chromatography Using Photoionization and/or Electrolytic Conductivity Detectors, SW-846, USEPA December 1996.

Comments: QA/QC for Samples 56560-56563, 56558

Analyst

Review



Client:	ConocoPhillips	Project #:	96052-1777
Sample ID:	BGT Sample	Date Reported:	11-29-10
Lab ID#:	56560	Date Sampled:	11-24-10
Sample Matrix:	Soil	Date Received:	11-24-10
Preservative:	Cool	Date Analyzed:	11-29-10
Condition:	Intact	Chain of Custody:	10810

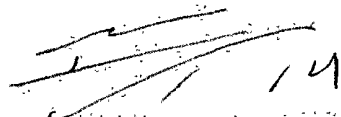
Parameter	Concentration (mg/Kg)
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Total Chloride

50

Reference: U.S.E.P.A., 4500B, "Methods for Chemical Analysis of Water and Wastes", 1983.
Standard Methods For The Examination of Water And Waste Water", 18th ed., 1992.

Comments: **San Juan 28-7 #9**



Analyst



Review

CHAIN OF CUSTODY RECORD RUSH 10810

Client: Conoco Phillips			Project Name / Location: San Juan 28-7 #9				ANALYSIS / PARAMETERS																	
Client Address:			Sampler Name: Barin Williamson																					
Client Phone No.:			Client No.: 96052-1777																					
Sample No./ Identification	Sample Date	Sample Time	Lab No.	Sample Matrix	No./Volume of Containers	Preservative HgCl ₂ HCl E ₁			TPH (Method 8015)	BTEX (Method 8021)	VOC (Method 8260)	RCRA 8 Metals	Cation / Anion	RCI	TCLP with H/P	PAH	TPH (418.1)	CHLORIDE					Sample Cool	Sample Intact
BST Sample	11/24/10	9:56	56560	Soil Solid	Sludge Aqueous	1-4oz			X		X								X				Y	Y
				Soil Solid	Sludge Aqueous																			
				Soil Solid	Sludge Aqueous																			
				Soil Solid	Sludge Aqueous																			
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Relinquished by: (Signature)				Date	Time	Received by: (Signature)				Date	Time													
				11/24/10	12:26					11/24/10	12:26													
Relinquished by: (Signature)						Received by: (Signature)																		
Relinquished by: (Signature)						Received by: (Signature)																		
5796 US Highway 64 • Farmington, NM 87401 • 505-632-0615 • lab@envirotech-inc.com																								