



RECEIVED

By OCD District 1 at 7:34 am, Aug 27, 2015

APPROVED

By OCD District 1 at 7:34 am, Aug 27, 2015

A handwritten signature in black ink, appearing to read "Jan K. Hays".

CONOCOPHILLIPS

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

EVGSAU 2622-002
(1RP-3396)

Corrective Action Plan

API No. 30-025-26573

Release Date: October 26th, 2014

Unit Letter G, Section 26, Township 17S, Range 35E



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

August 24, 2015

Kellie Jones

Environmental Specialist – New Mexico Oil Conservation Division
Energy, Minerals and Natural Resources Department
1625 N. French Dr.
Hobbs, NM 88240

**RE: Corrective Action Plan
ConocoPhillips EVGSAU 2622-002 (1RP-3396)
UL/G sec. 26 T17S R35E
API No. 30-025-26573**

Ms. Jones:

ConocoPhillips (CoP) has retained Basin Environmental Service Technologies, LLC (Basin) to address potential environmental concerns at the above-referenced site.

Background and Previous Work

The site is located approximately 4.7 miles northeast of Buckeye, New Mexico at UL/G sec. 26 T17S R35E. NM OSE and BLM installed monitor well records indicate that groundwater will likely be encountered at a depth of approximately 57 +/- feet.

On October 26th, 2014, CoP discovered that a flow line had ruptured, releasing 6.27 barrels of produced water over 871 sq ft of caliche pad. None of this fluid was recovered. NMOCD was notified of the release on October 27th, 2014, and an initial C-141 was submitted to NMOCD for approval. NMOCD approved the C-141 on October 27th, 2014 (Appendix A).

Basin personnel were on site to assess the release on August 11th, 2015. The release was mapped and photographed. Two samples were collected at the surface and with depth, and representative samples were sent to a commercial laboratory for analysis (Appendix B). Laboratory analysis of Point 1 at the surface returned a chloride value of 21, 800 mg/kg, a Gasoline Range Organics (GRO) value of non-detect and a Diesel Range Organics (DRO) value of 4,550 mg/kg. At 6 inches bgs, Point 1 returned a chloride value of 3,680 mg/kg, a GRO value of non-detect and a DRO value of 55.3 mg/kg. Laboratory analysis of Point 2 at the surface returned a chloride value of 14,400 mg/kg, a GRO value of non-detect and a DRO value of 207 mg/kg. At 6 inches, Point 2 returned a chloride value of 176 mg/kg and GRO and DRO values of non-detect.

Photo Documentation may be found in Appendix C.

Corrective Action Plan

Based on the assessment, the release area around Point 1 will be scraped down 1 ft bgs and the release area around Point 2 will be scraped down to 6 inches bgs (Figure 1). Once the scrapes are completed, discreet bottom samples will be taken from each scrape and field tested for chlorides and organic vapors. If the field data indicates that the composite will not achieve chloride, Gasoline Range Organics (GRO) and Diesel Range Organics (DRO) readings below regulatory standards, the scrape will be deepened until field testing indicates that all constituents from the discreet bottom samples will return values below regulatory standards. The discreet bottom samples will then be taken to a commercial laboratory to confirm that chloride, GRO and DRO readings are below regulatory standards.

All excavated soils will be taken to a NMOCD approved facility for disposal. Clean soil will be imported to the site to use as backfill. A sample of the imported soil will be taken to a commercial laboratory to confirm that the chloride reading is below regulatory standards. The scrape will be backfilled with the clean, imported caliche and contoured to the surrounding location.

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

Basin appreciates the opportunity to work with you on this project. Please call me at (575) 942-8542 if you have any questions or wish to discuss the site.

Sincerely,

A handwritten signature in black ink that reads "Kyle Norman" followed by a horizontal line.

Kyle Norman
Project Lead
Basin Environmental Service Technologies, LLC
(575) 942-8542

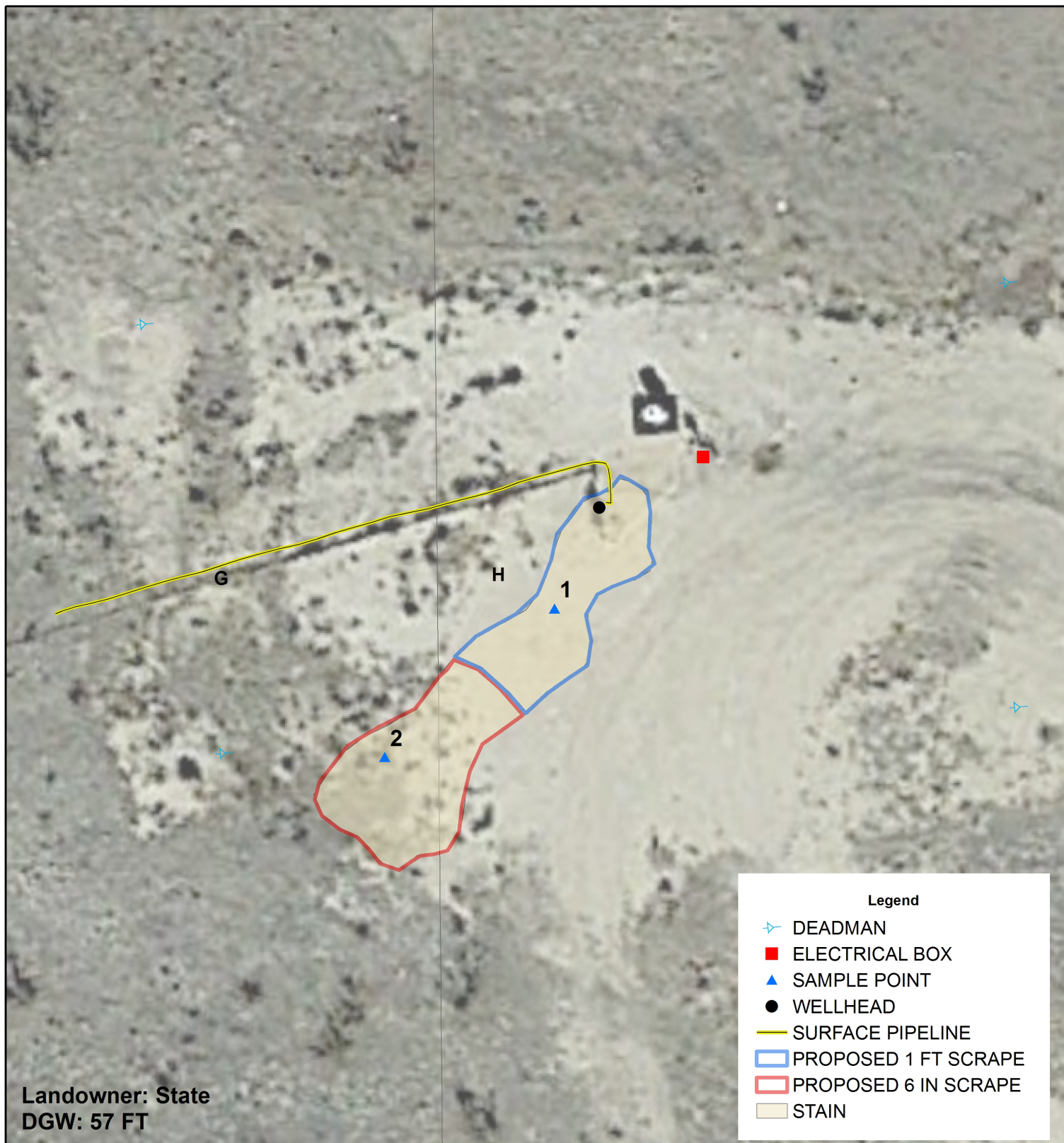
Attachments:

- Figure 1 – Proposed Scrapes
- Appendix A – Initial C-141
- Appendix B – Laboratory Analysis
- Appendix C – Photo Documentation

Figures

Basin Environmental Service Technologies, LLC
P.O. Box 2948, Hobbs, NM 88241
Phone 575.393.2967

Proposed Scrapes



CONOCOPHILLIPS EVGSAU 2622-002

1RP-3396

UL G & H SECTION 26
T-17-S R-35-E
LEA COUNTY, NM

Figure 1

0 10 20
Feet

GPS date: 8/11/15 KN
Drawing date: 8/11/15
Drafted by: T. Grieco



Appendix A

Intial C-141

Basin Environmental Service Technologies, LLC
P.O. Box 2948 Hobbs, NM 88241
Phone 575.393.2967

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
Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

OCT 27 2014

RECEIVED

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company: ConocoPhillips	Contact: Jay Garcia
Address: 29 Vacuum Complex Lane	Telephone No. 575-704-2455
Facility Name: EVGSAU 2622-002	Facility Type: Well

Surface Owner: NMOCD	Mineral Owner: NMOCD	API No. 30-025-26573
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LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
G	26	17S	35E	1430	North	1330	East	LEA

Latitude **32.8091592223742** Longitude **103.424090214125**

NATURE OF RELEASE

Type of Release: Spill	Volume of Release: 6.27 BBLs	Volume Recovered: 0 BBLs
Source of Release: Flow Line	Date and Hour of Occurrence 10/26/2014 5:00 pm	Date and Hour of Discovery 10/27/2014 10:00 am
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Tomas Oberding	
By Whom? Jay Garcia	Date and Hour: 10/27/2014 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.*

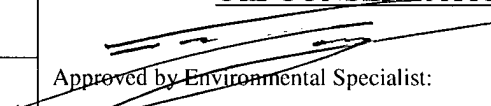
Describe Cause of Problem and Remedial Action Taken.*

On Monday October 27th, 2014 @ 1000Hrs. MST, A release occurred at the EVGSAU #2622-002 located 3 miles east of buckeye office. MSO was making his rounds discovered a flow line had ruptured, due to wear and tear and age of flow line that caused it to rupture. MSO shut in flow line and repair order has been submitted. Release of 6.27 barrels produced water with none recovered. Affected area was 75 foot by 45 foot X 1 inch deep and was not contained. The affected area will be remediated according to NMOCD guidelines.

Describe Area Affected and Cleanup Action Taken.*

Release of 6.27 barrels produced water with none recovered. Affected area was 75 foot by 45 foot X 1 inch deep and was not contained. The affected area will be remediated according to NMOCD guidelines.

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: <i>Jay Garcia</i>	 Approved by Environmental Specialist:		
Printed Name: Jay Garcia			
Title: LEAD HSE	Approval Date: 10-27-14	Expiration Date: 12-27-14	
E-mail Address: jay.c.garcia@conocophillips.com	Conditions of Approval: <i>Site Super report - Done Remediate me as per NMOCD guidelines. Submit final C-141 by 12-27-14</i>		Attached <input type="checkbox"/> IRP-3396
Date: 10/24/2014	Phone: 575-704-2455		

* Attach Additional Sheets If Necessary

OCT 30 2014

*ogalala 217812
N1014 30053203
P7014 30053399*

Appendix B

Laboratory Analysis

Basin Environmental Service Technologies, LLC
P.O. Box 2948 Hobbs, NM 88241
Phone 575.393.2967



August 17, 2015

KYLE NORMAN

BASIN ENVIRONMENTAL - HOBBS

419 W. CAIN

HOBBS, NM 88240

RE: EVGSAU 2622-002

Enclosed are the results of analyses for samples received by the laboratory on 08/11/15 14:30.

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".

Celey D. Keene

Lab Director/Quality Manager

Analytical Results For:

 BASIN ENVIRONMENTAL - HOBBS
 KYLE NORMAN
 419 W. CAIN
 HOBBS NM, 88240
 Fax To: (575) 393-0293

Received:	08/11/2015	Sampling Date:	08/11/2015
Reported:	08/17/2015	Sampling Type:	Soil
Project Name:	EVGSAU 2622-002	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: PT. 1 SURFACE (H502092-01)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	21800	16.0	08/17/2015	ND	400	100	400	3.92	
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	08/12/2015	ND	210	105	200	0.683	
DRO >C10-C28	4550	50.0	08/12/2015	ND	190	94.9	200	3.11	
<i>Surrogate: 1-Chlorooctane</i>	<i>113 %</i>	<i>47.2-157</i>							
<i>Surrogate: 1-Chlorooctadecane</i>	<i>264 %</i>	<i>52.1-176</i>							

Sample ID: PT. 1 @ 6" (H502092-02)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	3680	16.0	08/17/2015	ND	400	100	400	3.92	
TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/12/2015	ND	210	105	200	0.683	
DRO >C10-C28	55.3	10.0	08/12/2015	ND	190	94.9	200	3.11	
<i>Surrogate: 1-Chlorooctane</i>	<i>110 %</i>	<i>47.2-157</i>							
<i>Surrogate: 1-Chlorooctadecane</i>	<i>145 %</i>	<i>52.1-176</i>							

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

 BASIN ENVIRONMENTAL - HOBBS
 KYLE NORMAN
 419 W. CAIN
 HOBBS NM, 88240
 Fax To: (575) 393-0293

Received:	08/11/2015	Sampling Date:	08/11/2015
Reported:	08/17/2015	Sampling Type:	Soil
Project Name:	EVGSAU 2622-002	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: PT. 2 SURFACE (H502092-03)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	14400	16.0	08/17/2015	ND	400	100	400	3.92	
TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/12/2015	ND	210	105	200	0.683	
DRO >C10-C28	207	10.0	08/12/2015	ND	190	94.9	200	3.11	

Surrogate: 1-Chlorooctane 119 % 47.2-157

Surrogate: 1-Chlorooctadecane 149 % 52.1-176

Sample ID: PT. 2 @ 6" (H502092-04)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	176	16.0	08/17/2015	ND	400	100	400	3.92	
TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/12/2015	ND	210	105	200	0.683	
DRO >C10-C28	<10.0	10.0	08/12/2015	ND	190	94.9	200	3.11	

Surrogate: 1-Chlorooctane 119 % 47.2-157

Surrogate: 1-Chlorooctadecane 148 % 52.1-176

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

- S-06 The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.
- 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



Celey D. Keene, Lab Director/Quality Manager



CARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603
 (505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325)673-7020

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: Conoco Phillips		BILL TO				ANALYSIS REQUEST																																														
Project Manager: Kyle Norman		P.O. #:				Chlorides	TPH 8015 M	BTEX	Texas TPH	Complete Cations/Anions	TDS																																									
Address:		Company: Basin Environmental																																																		
City:	State:	Zip:	Attn:																																																	
Phone #:	Fax #:		Address: 419 W. Cain																																																	
Project #:	Project Owner:		City: Hobbs																																																	
Project Name:		State: NM			Zip: 88240																																															
Project Location: EVGSAU 2622-002		Phone #:																																																		
Sampler Name: Kyle Norman		Fax #:																																																		
FOR LAB USE ONLY		(GRAB OR (C)OMP. # CONTAINERS	MATRIX																			PRESERV.		SAMPLING																												
Lab I.D.	Sample I.D.		GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:	ICE / COOL	OTHER :	DATE	TIME																																							
H502092																																																				
1	Pt. 1 Surface	1			✓					✓	8/11/15	10:00	✓	✓																																						
2	Pt. 1 @ 6"	1			✓					✓	8/11/15	10:15	✓	✓																																						
3	Pt. 2 Surface	1			✓					✓	8/11/15	11:05	✓	✓																																						
4	Pt. 2 @ 6"	1			✓					✓	8/11/15	11:45	✓	✓																																						

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: <i>Kyle N</i>		Date: 8-11-15	Received By: <i>Jodi Benson</i>	Phone Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Phone #:
		Time: 2:30		Fax Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Fax #:
Relinquished By:		Date:	Received By:	REMARKS: email results:knorman@basinenv.com; jkamplain@basinenv.com; lflores@basinenv.com; lweinheimer@basinenv.com; cursanic@basinenv.com environmental tech: @basinenv.com company:	
Delivered By: (Circle One)					
Sampler - UPS - Bus - Other: 3.6c		Sample Condition Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	CHECKED BY: (Initials) <i>JK</i>		

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

#54

Appendix C

Photo Documentation

Basin Environmental Service Technologies, LLC
P.O. Box 2948 Hobbs, NM 88241
Phone 575.393.2967

ConocoPhillips EVSGAU 2622-002

Unit Letter G, Section 26, T17S, R35E



Initial release area, facing east

8/11/15



Initial release area, facing west

8/11/15



Initial release area, facing north

8/11/15