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., Sunta Fe, NM 87505

State of New Mexico Energy Minerals and Natural Resources

Form C-141 Revised March 17, 1999

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

			Rele	ease Notific	atio	n and Co	rrective A	ction	1			
						OPER	ATOR		X Initi	al Report		Final Repo
		ConocoPhillip)S			Contact M		\F.C				
Address 92 Facility Nat			t oas oa	thering system			No.□505-391-19 e□Gas pipelíne			***************************************		
			., par pa		***************************************		~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~			* ~~		
Surface Ow	ner BLM			Mineral C	wner				Lease 1	<u> </u>	··········	······································
	T	300				N OF REI	*****				······	
Unit Letter	Section	Township	Range	Feet from the	North	/South Line	Feet from the	East/\	West Line	County		
	31	17	32	Est.1700	South		Est.1020	East	**************************************	Lea		
				NAT	'URE	OF REL	EASE					
Type of Rele	ase Crude o	oil/condensate			***	······································	Release est 15-		Volume I	Recovered :	0 BBI	······································
Source of Re Pipeline	lease		***************************************		***************************************		lour of Occurrenc	e	Date and 2003	Hour of Dis	cover	/⊕April 17,
Was Immedia	ate Notice (***************************************	If YES, To		***************************************	1 2003	***************************************		
	***		Yes X	No Not Req	uired							
By Whom? (abort?			***********	Date and F	lour!!! olume Impacting t	he Wate	ercourse	······································		
Was a Water	oodise itea		Yes X	No		1	g t					
If a Watercou	ırse was Im	pacted, Descr	be Fully.	\$			and the section of th				necessiste de la constantion d	
location recei	ntly expose I soil to pro of spill area	d in sand dun per disposal fa to our expert	es. Upon cility but	n Taken.* Initially further investigate found convention ion Technology te	ion four al reme	nd much gr <mark>eat</mark> diation techni	er extent of contact ques impractical of	minatio due to re	n undergro emot <mark>enes</mark> s	und. Remorof location.	ved 12 We w	6 yards of ill transfer
Describe Are	a Affected	and Cleanup A	Action Tal situation	ken.* Area is in re and work with au	mote sa thoritie	and dunes and s to formulate	requires inspection plan and remedia	on by fo	ot or speci ainder of si	alized vehic te.	le. Wi	l asses
regulations a public health should their c or the environ	Il operators or the envi operations h nment. In a	are required to ronment. The nave failed to a	o report an acceptant adequately OCD accept	e is true and comp nd/or file certain r ce of a C-141 repo v investigate and r otance of a C-141	elease rort by the emediate	notifications a le NMOCD m te contaminati	nd perform correct arked as "Final Roon that pose a three	tive act eport" of eat to g	ions for rel loes not rel round wate	eases which ieve the ope r, surface w	may or rator o ater, h	endanger of liability uman health
	<u> </u>						OIL CON	SERV	ATION	DIVISIO	<u>NC</u>	
Signature:												
Printed Name	e: Mark B	ishop				Approved by	□District Supervi	sor:	***************************************	***************************************		***************************************
Title: Enviro	nmental Sp	ecialist	400-100-100-100-100-100-100-100-100-100-			Approval Da	te:		Expiration	Date:		
Date: April	21, 2003			505-391-1956		Conditions o	f Approval:			Attached		
Attach Addi	tional She MOCO Celetry	ets If Necess Phillip FPHC	ary Vo - & _ O6 1	00 4940 00 4940	Đ	inc	(dent-	nt -p	PAC O PAC O	1004 16104	950 981	59



July 30, 2004

Mr. Paul Sheelev New Mexico Oil Conservation Division 1625 N. French Drive Hobbs, New Mexico 88240

RE: Lusk Discharge Line Release – Path Forward

Location SE Qtr, Sec 31, T 17, R 32 E

Dear Mr. Sheeley:

As you know, ConocoPhillips has delayed the remediation of the subject release Site to allow Mack Energy to prepare a drilling pad, Weasel #1, south of the Site. This drill pad was to be used as a staging area and reduce surface disturbance in an ecologically sensitive dune area. The planned remediation included excavation, hauling and backfilling soil in response to a condensate release found on April 17, 2003 (Form C-141 is attached). An estimated 15 – 25 barrels of condensate was released into the sand dune area in which the pipeline right-of-way passes through.

Maxim Technologies, Inc. (Maxim) submitted a report to the U.S. Bureau of Land Management (BLM) and to the New Mexico Oil Conservation Division (NMOCD) during July 2003 summarizing the soil data collected adjacent to the pipeline during two sampling events. Maxim also collected soil data on January 6, April 27 and May 19, 2004 (Tables 1 and 2). Based on the risk-based ranking criteria presented in the NMOCD Guidelines for Remediation of Leaks, Spills and Released, the affects related to the April 2003 release were above the NMOCD action levels Total ranking score of 10, with site-specific remediation levels of 5,000 milligrams per kilogram for total petroleum hydrocarbon (TPH) and 50 parts per million (ppm) from a Photo-Ionization Detector (PID) for benzene, toluene, ethylbenzene and total xylene].

Table 1. Lusk Discharge Line Photo-ionization Detector Readings

Depth		May 15, 2003	Readings	at Sampling	Location			 May 27, 2004						
(ft)	HA -1	HA -2	HA -3	BH-4	BH-5*	HA -6**	HA -1	HA -2	HA -3	BH-4	BH-51	HA -62		HA-6 ²
0-3	0.3	1.0	0.7	17.0	-	48.0					-	10.7		0
5														1348
3-6	0.3	0.5	0.8	4.5	-		0.2	0.7	0.5	2.0	-			 845
6-9	0.8	0.4	0.4	1.4	-						•			
9-12	0.4	0.2	0.4	1.1	15.7		0.6	0.2	1.5	0.9	50.8			

¹ Below bottom of excavated area Inside condensate/crude oil affected area

Table 2. Lusk Discharge Line Delineation of Condensate/Crude Oil Release

								Data	Analysis -	Sampling Lo	cations and S	Sampling Date	:5						
Parameter	HA		HA		H/		BH-4 BH-51				HA	-6;			SH-8				
Sampling Date	5-15-2003	6-26-2003	5-15-2003	5-15-2003	5-15-2003	5-15-2003	5-15-2003 6-26-2003		6-26-2003	5-15-2003	4-27-2004	5-19-2	2004		4-27-2004	5-19-2004		5/19	/2004
Laboratory	STL	ŞTL	STL	STL	STL	STL	STL	STL	STL	STL	STL	STL.	u	STL	STL	STL	ш	STL	ш
Sample Depth (ft)	6	12	6	11	6	10	3	10	13	2	63	5 ³	53	2	2	5³	53	2	2
TPH (mg/Kg)																			
Diesel Range									l			1			15,100*	- 1			
	4.2	6	12	1.8	2.6	2.3	2.5	ND	18	9,000	14,000	19,000	8,300	7,800	18,000**	9,400	17,000	7,200	10,000
Gasoline Range	_												T		36.7				
	ND	ND	ND	ND	ND	ND	ND	ND	214	27.5	370	920	570	7.8	2.1	5.9	57	3.5	
SPLP (ma/Ka) Semivolatiles								ND											
Volatiles								ND											
Volatile Organics																			
(<u>ma/Ka)</u>									l				l	l <u>.</u>	l i	- 1			
Benzene					1 .				! .))	0.32	ļ	1 .	ND) }	,	,	Į.	
Ethylbenzene Toluene											0.66		1	ND	1 1	- 1			
Xylenes (total)	ĺ										0.45			ND DN	1 1			l	
									-		1.20		.	NU					
Moisture (%)								31		l									
Cl (mg/Kg)	11.4 om of excava	ND	36.7	10.9	31.2	17.7	37.4	ND HA = Hand	91.9	13	STL = Severn				· NMOCD	1			

Inside condensate/crude oil affected area

Sample taken at point of auger rejection

BH = Backhoe SH = Hand shovel LL = Lancaster Laboratories

Corrected value (analyst error in entering the dilution factor for TPH-DRO)

ND - not detected

It is ConocoPhillips intention to excavate the condensate affected soil and haul this soil to a State approved disposal location. However, we plan to use Mack Energy's Weasel #4 well pad located approximately 100 feet northwest of the release Site (Figure 1). The reason for the change is Weasel #4 is constructed and #1 has not been built. It is anticipated that two pipeline right-of-ways will be used to access the Site. These right-of-ways and the area around the release location will be archaeologically examined prior to commencement of excavation. Maxim will make all necessary pre-start notifications and notify the BLM and the NMOCD at least 48 hours in advance of initiation of excavation at the Site.

To ensure all soil left in place is within NMODC remediation standards, excavation side wall (4) and bottom (1) samples will be collected, split, and tested. One split will be field soil vapor headspace tested using a PID. A PID reading of < 50 ppm will be the criteria used to stop further excavation. The second split will be placed into glass sample jars, sealed with Teflon-lined lids, and placed on ice for transportation to an analytical laboratory. These spilt samples will be analyzed for TPH (Method 8015 GRO-DRO) and used for confirmation.

We are prepared to initiate these actions as soon as we receive your approval to proceed. If you have any questions regarding this approach, please do not hesitate to contact me or Mr. Charles Durrett (Maxim Technologies) at 432-686-8081.

Sincerely, **MAXIM** TECHNOLOGIES

Charles Durrett DN: CN = Charles Durrett DN: CN = Charles Durrett, C = US, O = Maxim Technologies, Inc. Date: 2004.07.30 16:43:25 -05'00'

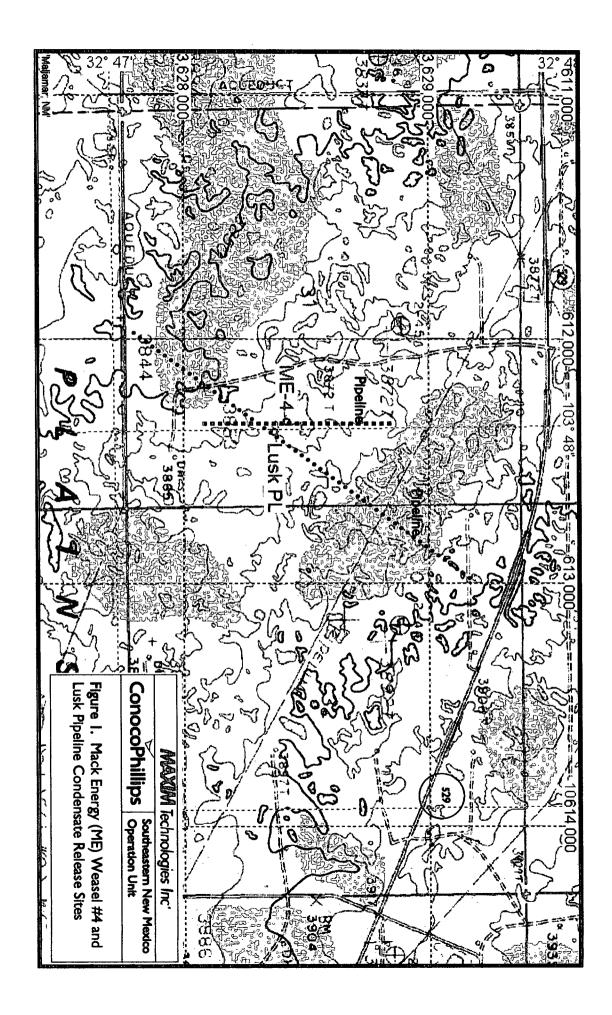
Charles Durrett Office Manager

Cc:

Mr. Ken Andersen, ConocoPhillips

Mr. Neal Goates, ConocoPhillips

Mr. Paul Evans, U.S. Bureau of Land Management



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 1220'8: St. Francis Dr., Santa Fe, NM 87505

State of New Mexico Energy Minerals and Natural Resources

Oil Conservation Division 1220 South St. Francis Dr. ATTACHMENT Form C-141
Revised March 17, 1999

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

				N.	111661 7	O, INIVI O75	0.5										
			Rele	ease Notific	catio	n and Co	rrective A	ction	1			<u> </u>					
					OPERA	ATOR		X Initia	al Report	П	Final Repo						
Name of Co	mpany C	ConocoPhilli	ps			Contact □ M	ark Bishop		***************************************								
Address 92						Telephone N	\o.□50 5-391-1 9	956		***************************************	***************************************	***************************************					
Facility Nan	ne Maljar	nar Gas Plar	it, gas ga	thering system		Facility Typ	e⊟Gas pipeline										
Surface Owi	ner BLM			Mineral C	Owner				Lease N	lo. 🖰	ECOTO DE LA COLOR	***************************************					
<u></u>		**************************************	**************************************			NORDE	PACE										
Unit Letter	Section	Township	Range	Feet from the	·	N OF REI	Feet from the	Fact/\	West Line	County							
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<u> </u>	31	<u> 17</u>	32	Est.1700	Sout	<u> </u>	Est.1020	East		Lea							
				NAT	CURI	OF REL	EASE										
Type of Relea	use Crude o	oil/condensate					Release est 15-		Volume F	Recovered	0 BBL						
Source of Rel	lance	######################################				25BBL.	our of Occurrenc		Data and	Haum of Die		/○April 17,					
Pipeline	icasc					(Historic, t		·C	2003	rioui di Dis	covery	емрици,					
Was Immedia	ite Notice (If YES, To			<u> </u>	***************************************		**************************************					
			Yes X	No Not Rec	quired												
By Whom?					***	Date and Hour□											
Was a Watero	course Read	yourse	. v v	X Y		If YES, Vo	lume I <mark>mpacting t</mark>	he Wat	ercourse.								
		L_	Yes X	NO													
If a Watercou	ır se was Im	pacted, Descr	ibe Fully.	*													
				n Taken.* Initiall													
				further investigated found convention													
remediation c	of spill area	to our expert	Remediat	ion Technology to	eam to	for formulation	of remediation p	olan. Es	timate an ac	Iditional 30) yards	of					
contaminated	soil on loc	ation.															
				cen.* Area is in re							le. Will	lasses					
appropriate re	emediation	techniques to	r situation	and work with at	utnoriti	es to formulate	pian and remedia	ite rema	iinder of sit	e.							
I hereby certi	fy that the	information g	iven abov	is true and comp	olete to	the best of my	knowledge and u	ndersta	nd that purs	suant to NM	OCD r	ules and					
regulations al	l operators	are required t	o report a	nd/or file certain	release	notifications a	nd perform correc	tive act	ions for rel	eases which	may e	ndanger					
public health	or the envi	ronment. The	acceptan	ce of a C-141 report investigate and to	ort by t	he NMOCD m	arked as "Final K	epon" (10es not rei	ieve the ope	rator o	T Hability					
or the environ	ment in a	iddition NMC	nucquatery CD accer	otance of a C-141	report	does not reliev	e the operator of	respons	ibility for c	ompliance	with an	v other					
federal, state,							•										
							OIL CON	SERV	ATION	DIVISIO	<u>NC</u>						
Signature:																	
Digitaluic.				***************************************	***************************************	Approved by	District Supervi	isor:									
Printed Name	: Mark B	ishop			····	- spproved by						×					
Title: Enviror	nmental Sp	ecialist				Approval Da	te:	Expiration Date:									
				A *A* ****			C A			Attached		**************************************					

Conditions of Approval:

Date: April 21, 2003

Phone: 505-391-1956

^{*} Attach Additional Sheets If Necessary



July 30, 2004

Mr. Paul Sheeley New Mexico Oil Conservation Division 1625 N. French Drive Hobbs, New Mexico 88240

RE:

Lusk Discharge Line Release - Path Forward

Location SE Qtr, Sec 31, T 17, R 32 E

Dear Mr. Sheeley:

As you know, ConocoPhillips has delayed the remediation of the subject release Site to allow Mack Energy to prepare a drilling pad, Weasel #1, south of the Site. This drill pad was to be used as a staging area and reduce surface disturbance in an ecologically sensitive dune area. The planned remediation included excavation, hauling and backfilling soil in response to a condensate release found on April 17, 2003 (Form C-141 is attached). An estimated 15 – 25 barrels of condensate was released into the sand dune area in which the pipeline right-of-way passes through.

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Lusk Discharge Line **Photo-ionization Detector Readings**

Depth		May 15, 2003	Readings	at Sampling	Location			May 27, 2004						
_(ft) [HA -1	HA -2	HA -3	BH-4	BH-5*	HA -6**	HA -1	HA -2	HA -3	BH-4	BH-5'	HA -62		HA-6'
0-3	0.3	1.0	0.7	17.0		48.0					•	10.7		0
5														1348
3-6	0.3	0.5	0.8	4.5	-		0.2	0.7	0.5	2.0				845
6-9	0.8	0.4	0.4	1.4	-						-			
9-12	0.4	0.2	0.4	1.1	15.7		0.6	0.2	1.5	0.9	50.8			
Belov	v bottom of e	xcavated are	а											

Inside condensate/crude oil affected area

Table 2. Lusk Discharge Line Delineation of Condensate/Crude Oil Release

								Data	a Analysis -	Sampling Lo	cations and S	ampling Date	:6						
Parameter	HA-1		HA -2		HA-3		BH-4		BH-5'		HA -61			SH -7'				SH-8	
Sampling Date	5-15-2003	6-26-2003	5-15-2003	5-15-2003	5-15-2003	5-15-2003	5-15-2003	6-26-2003	6-26-2003	5-15-2003	4-27-2004		-2004	1-06-2004	4-27-2004	5-19-2004		5/19/2004	
Laboratory	STL	STL	STL	STL	ш	STL	STL	STL	ч	STL	Ц								
Sample Depth (ft)	6	12	6	11	6	10	3	10	13	2	63	53	53	2	2	53	53	2	
TPH (mg/Kg) Diesel Range															15,100*				
	4.2	6	12	1.8	2.6	2.3	2.5	ND	18	9,000	14,000	19,000	8,300	7,800	18,000**	9,400	17,000	7,200	10,00
Gasoline Range	ND	214	27.5	370	920	570	7.8	36.7 2.1	5.9	57	3.5	6							
SPLP (mg/Kg) Semivolatiles								ND											
Volatiles							l	ND							1 1				
Volatile Organics (mg/Kg) Benzene Ethylbenzene Toluene Xylenes (total)											0.32 0.66 0.45 1.20			D D D D					
Moisture (%)								31											
CI (mg/Kg)	11.4	ND)	36.7	10.9	31.2	17.7	37.4	ND	91.9	13	STI = Severn				* NMOCD				

Inside condensate/crude oil affected area

Sample taken at point of auger rejection ND - not detected

BH = Backhoe

STL = Severn Trent Laborato

LL = Lancaster Laboratories

Corrected value (analyst error in entering the dilution factor for TPH-DRO)

Results in milligrams per kilogram (mg/Kg)

It is ConocoPhillips intention to excavate the condensate affected soil and haul this soil to a State approved disposal location. However, we plan to use Mack Energy's Weasel #4 well pad located approximately 100 feet northwest of the release Site (Figure 1). The reason for the change is Weasel #4 is constructed and #1 has not been built. It is anticipated that two pipeline right-of-ways will be used to access the Site. These right-of-ways and the area around the release location will be archaeologically examined prior to commencement of excavation. Maxim will make all necessary pre-start notifications and notify the BLM and the NMOCD at least 48 hours in advance of initiation of excavation at the Site.

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Sincerely, **MAXIM** TECHNOLOGIES

Charles Durrett Digitally signed by Charles Durrett DN: CN = Charles Durrett, C = US, O = Maxim Technologies, Inc. Date: 2004.07.30 16:43:25 -05'00'

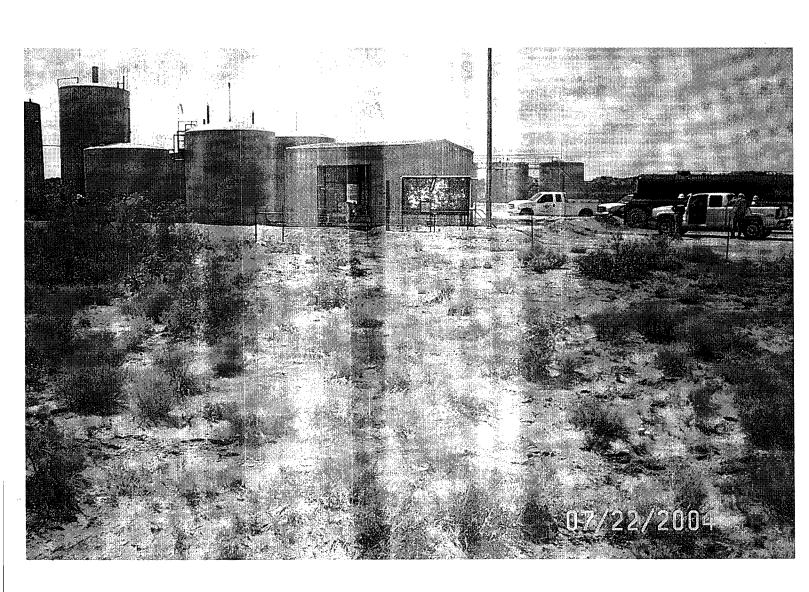
Charles Durrett Office Manager

Cc:

Mr. Ken Andersen, ConocoPhillips

Mr. Neal Goates, ConocoPhillips

Mr. Paul Evans, U.S. Bureau of Land Management





NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

August 4, 2004

Conoco Phillips Attn: Neal Goates 600 N. Dairy Ashford Houston TX 77252-2197

Re:

Work Plan Approval

Lusk Discharge Line Release - Dated: July 30, 2004

UL-I, Sec 32-T18S-R35E

The remediation work plan referenced above and submitted to the New Mexico Oil Conservation Division (OCD) for ConocoPhillips by Maxim Technologies is **hereby approved** with the following conditions:

- 1. ConocoPhillips shall adhere to OCD rules and "Guidelines", (TPH conc. <1,000 mg/Kg).
- 2. ConocoPhillip shall split closure samples and submit at least two split samples to at least two laboratories.
- 3. ConocoPhillips shall notify OCD upon completion of excavation for inspection of delineation.
- 4. ConocoPhillips shall notify OCD at least 48-hr. prior to application of chemicals, closure sampling or backfilling.

and Drus seetile

Please be advised that OCD approval of this plan does not relieve ConocoPhillips of liability should their operations fail to adequately investigate and remediate contaminants that threaten ground water, surface water, human health or the environment. In addition, OCD approval does not relieve ConocoPhillips of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions or need assistance please write or call: (505) 393-6161, ext. 113, or e-mail: psheeeley@state.nm.us

Sincerely,

Paul Sheeley-Environmental Engineer

Cc: Roger Anderson - Environmental Bureau Chief

Chris Williams - District I Supervisor William Olson - OCD Hydrologist Larry Johnson - Environmental Engineer

Sheeley, Paul

From:

Cwdurrett1@aol.com

Sent:

Friday, July 30, 2004 4:06 PM

To: Cc: psheeley@state.nm.us; paul_evans@nm.blm.gov; Cwilliams@state.nm.us neal.goates@conocophillips.com; ken.n.andersen@conocophillips.com;

cyancey@maximusa.com

Subject:

ConocoPhillips - Lusk Discharge Line Work Plan



Lusk Discharge Line Release - Path Forward

Location SE Qtr, Sec 31, T 17, R 32 E

called 8.3.04 14:41 1eft nessage In Chulie care 10 = 1000 TPH

Attached is a work plan to excavate and backfill the Lusk DL petroleum hydrocarbon release site. If you approve, ConocoPhillips has authorized Maxim to initiate the work. If you have any questions concerning this work plan, please call me.

Please acknowledge receipt of this e-mail.

Sincerely,

Charlie Durrett Maxim Technologies 1703 W. Industrial Ave. Midland, TX 79701 P 432-686-8081 F 432-686-8085

++++++CONFIDENTIALITY NOTICE++++++

The information in this email may be confidential and/or privileged. This email is intended to be reviewed by only the individual or organization named above. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this email and its attachments, if any, or the information contained herein is prohibited. If you have received this email in error, please immediately notify the sender by return email and delete this email from your system.

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