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

1RP 2584

Form C-141 Revised October 10, 2003

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

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

FINAL

			Rel	ease Notific	catio	n and Co	orrective A	ction			
						OPERA'	FOR		Initia	al Report	
Name of Co	ompany C	onocoPhilli	os Comp	any		Contact Jol	nn Gates				
				land, TX 70705	-5	Telephone l	No. 575-391-3	158			
Facility Nat	ne Phillip	s State E Ba	ttery 2			Facility Typ	e Battery				
Surface Ow	ner Sta	ite		Mineral ()wner	State			Lease N	to. AP	1 30-025-24543
				LOCA	ATIO	N OF REI	LEASE				
Unit Letter	Section	Township	Range	Feet from the			Feet from the	East/W	est Line	County	
D	15	-	22 E							Len	
<u>D</u>	1 13				L					Lea	
		Latitud	le_N 32 :	50.393		Longitud	eW 103 38.8	818		-	
				NAT	URE	OF REL	EASE				
		Crude Oil									3 bbls
		•						e		Hour of Di	scovery
		liven?						L	Same		
ivus Hamieum			Yes [No 🗌 Not R	equired						
By Whom?	Jesse Sosa					Date and F	Tour 7/23/08 4:	52 pm			
						If YES, Vo	lume Impacting t	he Wate	rcourse.		
			Yes 🔀	No No							
If a Watercou	irse was Im	pacted, Descri	be Fully.	•							
External corr	osion on 3"				placed	on line and cr	ew was called to 1	repair the	line. Vac	ouum truck	was called and 3
50' narrowing	g to 20' X 9	00' affected a	rea on pas	sture land was ren	nediated	d. Geomemb	rane laid to protec	et ground	water.		
regulations al public health should their o or the enviror	I operators or the envir operations had nment. In a	are required to onment. The ave failed to a ddition, NMO	report an acceptance dequately CD accep	d/or file certain r te of a C-141 repo investigate and re	elease n ort by th emediat	notifications au le NMOCD m te contaminati	nd perform correct arked as "Final Re on that pose a thre	tive action eport" do eat to gro	ons for rele ses not reli- ound water	ases which eve the ope , surface w	may endanger rator of liability ater, human health
			M	/			OIL COM	SERY:			<u>)N</u>
Signature:	GH.	[]	(/25/	×1							
Name of Company ConocoPhillips Company Contact John Gates			ΞĒŘ								
Title:	HSER	. Lead				Approval Dat	e: 7·23·10	0 E	xpiration I	Date:	~~
E-mail Addre	Address 3300 N. "A" St., Bldg. 6 #24 Midland, TX 7 Facility Name Phillips State E Battery 2 Surface Owner State					Conditions of	Approval:		70.		·
Date: 7/15	/2010		Phone:	575-391-3158	Contact John Gates Telephone No. 575-391-3158 Facility Type Battery						

^{*} Attach Additional Sheets If Necessary

Burn Sp.11

District I 1625 N French Dr., Hobbs, NM 88240 District III 1301 W Grand Avenue, Artesia, NM 88210 District III 1000 Rub Brazas Road, Aztec NM 87410 District IV 1220 S. Si Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division 1220 South St. Francis Dr. Santa Fc, NM 87505 Form C-141 Revised October 10, 2003

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			Rel	case Notifi	catio	on and Co	orrective A	etio	n					
			-			OPERA			(X Initi	al Report	Final Repor			
Name of Co						Contact	Elroy Ardom							
		in St# 800 1	Houston,	TX 77002			No. (713) 495	5-6534						
Facility Nat	ne Jack B	-2 200				Facility Typ	ie N/A							
Surface Ow	ner RR	R Ranch		Mineral (Owner	EncrVest			Lease N	10. (API 30-	025-25871			
				LOCA	\TIC	ON OF REI				JACK	B 30= Z			
Unit Letter	Section	Pownship	Range	Feet from the	Noil	MSouth Line	feet from the	Enst/	West Line	County				
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<u> </u>	00.55	************		NAT	URI	OF RELI								
Type of Release							Release 5 BBLS			ecuvered 0	overv 5/13/10 PM			
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	•		Yes 🗵] No						•				
If a Watercou	rse was Imp	nacted, Descri	be Fully.											
		,												
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scheduled 5-														
I hereby certi	fy that the i	nformution gi	ven above	is true and comp ad/or file certain r	lete to	the best of my	knowledge and m	ndorstni tive act	id that pursi	uant to NMO	CD rules and			
public health	or the envir	onment. The	acceptance	ce of a C-141 repo	ni by t	he NMOCD m	arked as "Final Re	aport" d	locs not reli-	eve the opera	tor of hability			
ahould their c	perations h unent In n	ave tailed to r ddition, NMC	idequately ICD accer	investigate and rotance of a C-141	emedir report	ite confaminate does not relieve	on that pose a thro e the operator of r	នា1 ៤០ ខ្មា ទេន២០១នាំ	ound water. bility for co	, surface wate mphance wit	a. human health th any other			
federal, state,					<u>,</u>									
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Signature:	1)00	ylar		6100		L	Daniel a to to the thirty on	~	1					
Printed Name	:: Douglas	Vanie				Whibtoken pl.	District ENTH	MNO	<u>ENTAL E</u>	NGINEE	R			
Title HSE T	ech			····		Approval Date 5.24.(8 Expiration Date 7.26.(0								
E-mail Addre	ss dwatn	e@EnerVe	stact			Conditions of	Άρριον al.			7				
- Ann Andre	20300					· · · · ·	••			Attached				
Date 5-2-1-0	8		Phone. (9	79) 212 0148		Submatine	x C-141 w/3	Secs.	34 34	IRP#10	1.5. 2541			

* Attach Additional Sheets If Necessary

14C - HLUTIO 14456827 Arn. PLUTIO 14457195

1910 North Big Spring St. Midland, Texas 79705 (432) 686-8081



July 19, 2010

Mr. Larry Johnson New Mexico Oil Conservation Division Hobbs, New Mexico 88240

RE:

Phillips State E Battery 2 Lea County, New Mexico Unit B, Sec. 15, T17S, R33E Request for Closure Report NMOCD 1RP 2584

Dear Mr. Johnson:

On behalf of ConocoPhillips, Tetra Tech submits this request for closure report describing remediated conditions at a 142 barrel crude oil release at ConocoPhillips' Phillips State E Battery 2 site (Figure 1; Site). The Site is located immediately above the Mescalero Ridge, approximately 7.5 miles northeast of the ConocoPhillips MCA Unit office in Lea County, New Mexico (32.83988°N, 103.64696°W).

The Site is located in the Llano Estacado region of the Southern Great Plains. It is a large southeast-sloping plateau consisting of a nearly level to very gently undulating constructional plain that has little dissection and dotted by numerous small playas¹. Local topography is characterized by a linear plain.

According to the Geologic Map of New Mexico², the area is underlain by the Pliocene-age Ogallala Formation, which consists of fluvial sand, silt, clay, and gravel capped by caliche. Maximum thickness of the Ogallala is up to 100 feet. The Site is nearly level to gently sloping to the east and has Kimbrough series soils at the surface. The Kimbrough series has a 6-20 inches sandy loam surface overlaying indurated caliche¹. Typically, the surface layer is dark grayish brown gravelly loam.

There are no water well records for Section 15, Township 17 South, Range 33 East (New Mexico Office of the State Engineer, iWater database). The nearest records are in the southeast ¼ of the southeast ¼ of Section 9, immediately northwest of Section 15. These data indicates groundwater to be approximately 249 feet below ground surface (fbgs). A fresh water pond is located approximately 375 feet east of the Site and a paralleling minor drainage approximately 275 feet north on the affected area.

Following the ranking criteria presented in "Guidelines for Remediation of Leaks, Spills, and Releases" promulgated on August 13, 1993 by the NMOCD, this Site has the following score:

² New Mexico Bureau of Geology and Mineral Resources, 2003. Geologic Map of New Mexico, 1:500,000.

¹ Turner, M.T., D.N. Cox, B.C Mickelson, A.J. Roath, and C.D Wilson, 1973. Soil Survey Lea County, New Mexico. U.S. Department of Agriculture Soil Conservation Service, 89p.

<u>Criteria</u>		Ranking <u>Score</u>
Depth to groundwater	>100 feet	0
Distance from water source	>1,000 feet	0
Distance from domestic water source	>200 feet	0
Distance from surface water body	<1,000 feet	<u>10</u>
Total Ranking Score		10

The remediation action level for a ranking score of <19 is 10 parts per million (ppm) for benzene, 50 ppm for total benzene, toluene, ethylbenzene, and total xylenes (BTEX), and 1,000 ppm for total petroleum hydrocarbons (TPH).

Actions

Tetra Tech performed the following activities at the Phillips State E Battery 2:

- Beginning at excavation cell 15 and southwest toward the battery (Figure 2), soil was excavated to a depth of approximately 2 to 3 feet or until the BTEX concentrations were below the NMOCD action level of 100 ppm on a photo-ionization detector (PID). Random north and south sidewalls and floor excavation samples (cells 2-15) were submitted to a laboratory for analyses. The soil samples were analyzed for chloride (Method 300.0A), TPH_{DRO-GRO} (Method 8015) and BTEX (Method 8021B) to confirm that these constituents have been removed to concentrations below remediation guidelines.
- In excavation Cell 1, the affected soil was excavated to a depth of approximately 4 to 5 feet. The remaining soil in the excavation was slightly domed (1 foot higher than the sides). The slight doming of the soil beneath a "liner" material will promote lateral drainage off of the geo-membrane after placement. The dome was hand groomed by removing any large sticks and smoothing the surface. A one foot deep anchor trench was constructed around the inside perimeter of the excavation and a 40-mil medium density polyethylene geo-membrane was installed over the domed area. The membrane was cut to fit into the perimeter trench and native soil was backfilled around the perimeter to hold the geo-membrane in-place. Native soil with no debris was backfilled over the membrane to meet surrounding surface grades.
- Inside the battery area (Figure 3), affected soil was excavated by hand to a depth of approximately 1 foot. Hand digging was necessary owing to the numerous piping and electrical wires in the area.
- The excavated soil was hauled to a State approved disposal location.

Findings

Excavations at the Site encountered gravelly loam stained with petroleum hydrocarbons. A hard caliche caprock underlies the rocky loam at approximately 2 fbgs and the caprock was not broken through even at an excavation depth of 5 feet.

Mr. Larry Johnson July 19, 2010 Page 3

Laboratory analyses of soil remaining inside the tank battery area is above NMOCD recommended remediation limits for TPH (Table 1; Appendix). Benzene and Total BTEX concentrations are below recommended limits.

Confirmation laboratory analyses of soils remaining below the buried water deflection structure (excavation Cell 1) are below NMOCD recommended remediation limits for TPH, benzene and Total BTEX (Table 1, Appendix). The chloride concentration below the buried water deflection structure is 2,340 mg/Kg. Advancement of the west wall excavation was halted owing to underground piping and electrical wiring safety concerns. Chloride concentration on the west wall was 1,860 mg/Kg, while TPH, benzene, and BTEX were below the recommended remediation limits.

Confirmation sample laboratory analyses indicate the soils remaining in cells 2 - 15 are below NMOCD remediation standards (Table 1, Appendix). The average concentration of chloride left in-place is 377 mg/Kg and ranged from 2,650 to 10.04 mg/Kg.

Conclusions

According to laboratory analysis of soils collected during an earlier investigation, TPH, BTEX, and chloride concentrations were detected in the crude oil release area and the battery. Exposure pathway analysis indicated a ranking score of "10." The score of 10 was based on the crude oil release proximity to surface water and not groundwater (249 fbgs). Therefore, the site-specific remediation levels are 1,000 mg/Kg for TPH, 50 mg/kg for BTEX and 10 mg/Kg for benzene. According to laboratory analyses of soils collected during this remediation, reported TPH concentrations were only above the recommended action level in the tank battery. TPH, benzene and BTEX were reported below NMOCD's remedial action levels in all other areas. The average chloride concentration was 1,625 mg/Kg inside the battery and 377 mg/Kg in excavation cells 2 - 15. The chloride concentration below the buried water deflection structure is 2,340 mg/Kg.

Recommendations

The affected soil below the liner and the soil inside the battery area will be left in place until the battery is permanently closed in accordance with NMOCD rules for site abandonment. Tetra Tech recommends no further action be taken at the Phillips State E Battery 2 Site, and requests closure of 1RP 2584.

If you concur with this recommendation or if you have any questions or require additional information, please contact me (432-686-8081) or Mr. John Gates (ConocoPhillips, 575-391-3158), if you have any questions or require additional information.

Sincerely,

Tetra Tech, Inc.

Charles Durrett Digitally signed by Charles Durrett ON Cra-Charles Durrett, co-Tetra Tech, Inc., ou charles Durrett, co-Tetra Tech, Inc., ou charles Durett, co-Tetra Tech, Inc., ou charles Durett, co-Tetra Tech, Inc., ou

Charles Durrett Senior Project Manager

Cc. Mr. John Gates

Attachments: Figures, C141, Appendix



Table 1 ConocoPhillips Phillips State E Battery 2 **Crude Oil Release Excavation**

			Chloride	Total Petrol	eum Hydrocarb	ons (mg/Kg)	V	olatile Orga	nic Compo		
Zone	Area	Date	(mg/Kg)	DRO	GRO	Total	Benzene	Toluene	Ethyl-	Total	Total
						1			benzene	Xylenes	BTEX
	IB-E	5/10/2010	462	1,500	0.64	1,501	ND	ND	0.0016	0.0066	0.0082
	IB-S	5/10/2010	73.3	1,100	0.23	1,100	ND	ND	MD	0.0022	0.0022
	IB-W	5/10/2010	4,970	470	ND	470	ND	ND	ND	ND	ND_
_	IB-F	5/10/2010	995	1,800	ND	1,800	ND	ND	ND	ND	ND
1	NFL NFL	4/27/2010 5/10/2010	2,710 2,390	450	ND	450	ND	ND	ND	ND	ND
	A-N	4/29/2010	2,030	73	ND	73	ND	ND	ND	ND	ND
	A-N	5/10/2010	451	73	I ND		I ND	- ND	IND	ND	110
	A-E	4/29/2010	970	1,100	ND	1,100	ND	ND	ND	ND	ND
	A-E	5/10/2010	- 515	350	ND	350		<u></u>			
	A-W	5/10/2010	1,860	16	ND	16	ND	ND	ND	ND	ND
2	N	4/29/2010	2170	17	ND	ND	ND	ND	ND	ND	ND
	S	4/29/2010	184	13	ND	ND	ND	ND	ND	ND	ND
	F	4/29/2010	945	970	ND	ND	ND	ДN	ND	ND	ND
3	N	4/29/2010	118	14	ND	ND	ND	ND	ND	ND	ND
	S	4/29/2010	142	100	ND	ND	ND	ND	ND	ND	ND
	F	4/29/2010	160	640	ND	ND ND	ND	ND	ND	ND	ND
4	N	4/29/2010	198	13	ND	ND	ND	ND	ND	ND	ND
	S	4/29/2010	26.7	1600	ND	ND	ND	ND	ND	ND	ND
	F	4/29/2010	134	2800	ND	ND	ND	ND	ND	ND	ND
5	N	4/29/2010	522	9.8	ND	ND	ND	ND	ND	ND	ND ND
	S	4/29/2010	156 357	100	ND	ND ND	ND ND	ND ND	ND ND	ND ND	ND ND
6	F N	4/29/2010 4/29/2010	2650	2100 20	ND ND	ND ND	ND	ND	ND ND	ND	ND
•	S	4/29/2010	237	41	ND ND	ND	ND	ND	ND	ND	ND
	F	4/29/2010	843	1500	ND	ND	ND	ND	ND	ND	ND
7	N	4/29/2010	1090	31	ND ND	31	ND	ND	ND	ND	ND
	s	4/29/2010	1550	76	ND ND	76	ND	ND	ND	ND	ND
	F	4/29/2010	1420	1700	ND	1700	ND	ND	ND	ND	ND
	F	5/10/2010		23	ND	23					
8	N	4/23/2010	208	57	ND	57	ND	ND	ND	ND	ND
	S	4/23/2010	130	19	ND	19	ND	ND	ND	ND	ND
	F	4/23/2010	145	710	ND	710	ND	DN	DN	ND	ND
9	N	4/23/2010	21.9	59	ND	59	ND	ND	ND	ND	ND
	S	4/23/2010	258	38	ND	38	ND	ND	ND	ND	ND
	F	4/23/2010	265	450	ND	450	ND	ND	ND	ND	ND
10	N	4/23/2010	32.2	13	ND	13	ND	ND	ND	ND	ND
	S	4/23/2010	179	48	ND	48	ND	ND	ND	ND	ND
	F F	4/23/2010	186	1,800	ND	1,800	ND	ND	ND	ND	ND
11	N	5/10/2010 4/23/2010	35.7	47 92	ND ND	92	ND	ND	ND	ND	ND
•••	S	4/23/2010	36.7	950	ND ND	950	ND	ND	ND	ND	ND
	F	4/23/2010	59 9	2,200	ND ND	2200	ND	ND	ND	ND	ND
	F	5/10/2010	""	92	ND	92	.,,,	.,,,	.,,,	.,,,	140
12	N	4/23/2010	889	180	ND	180	ND	ND	ND	ND	ND
	S	4/23/2010	37.9	6.7	ND	6.7	ND	ND	ND	ND	ND
	F	4/23/2010	24.7	86	ND	8.6	ND	ND	ND	ND	ND
13	N	4/23/2010	82.5	1,400	ND	1,400	ND	ND	ND	ND	ND
	N	5/10/2010		260	ND	260					
	S	4/23/2010	31 3	220	ND	220	ND	ND	ND	ND	ND
	F	4/23/2010	26.6	140	ND	140	ND	ND	ND	ND	ND
14	N	4/23/2010	22.1	240	ND	240	ND	ND	ND	ND	ND
	S	4/23/2010	119	ND 100	ND ND	ND 100	ND	ND	ND	ND	ND
45	F N	4/23/2010	21 5	190	ND ND	190	ND 0.0014	ND	ND 0.0046	ND	ND 0.0467
15		4/23/2010	11.2	ND ND	ND ND	ND ND	0.0014	0.0065	0.0016	0.0072	0.0167
	S F	4/23/2010 4/23/2010	94.1 10.4	ND ND	ND ND	ND ND	ND ND	ND 0.0032	ND	ND 0.0026	ND 0 0058
NMOCD	Guidano		10.4	ND	וועט וויי	1,000	10	0.0032	ND	0.0020	50
		ns per kilogram				N = North side					30

mg/Kg = Milligrams per kilogram

DRO = Diesel range hydrocarbons

GRO = Gasoline range hydrocarbons

Blue - Indicates second sampling after additional excavation

IB-E = Inside battary east wall
IB-W = Inside battary west wall
IB-S = Inside battary south wall
IB-F = Inside battary floor

N = North side of excavation

S = South side of excavation

F = Floor of excavation

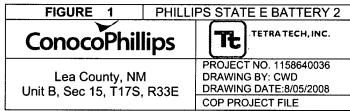
FL = Floor

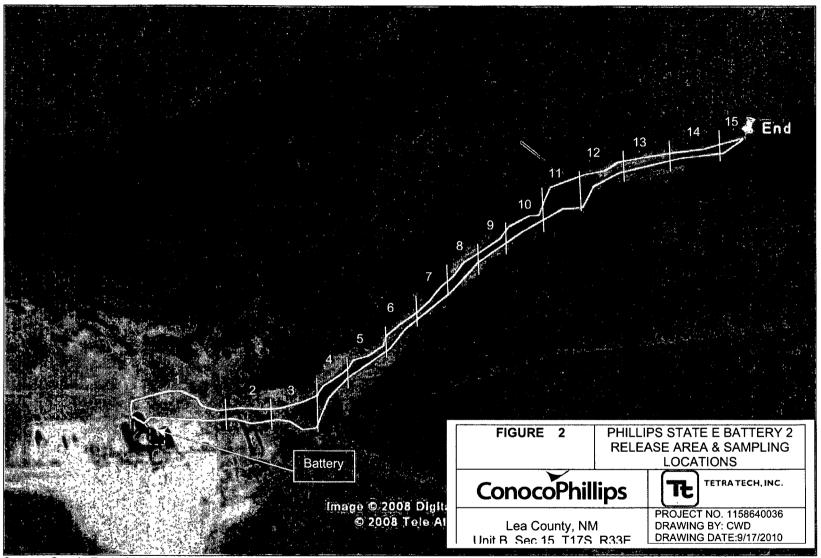
A = Area 1
ND = Analyte not detected at or above the laboratory detection limit

Blank = No data

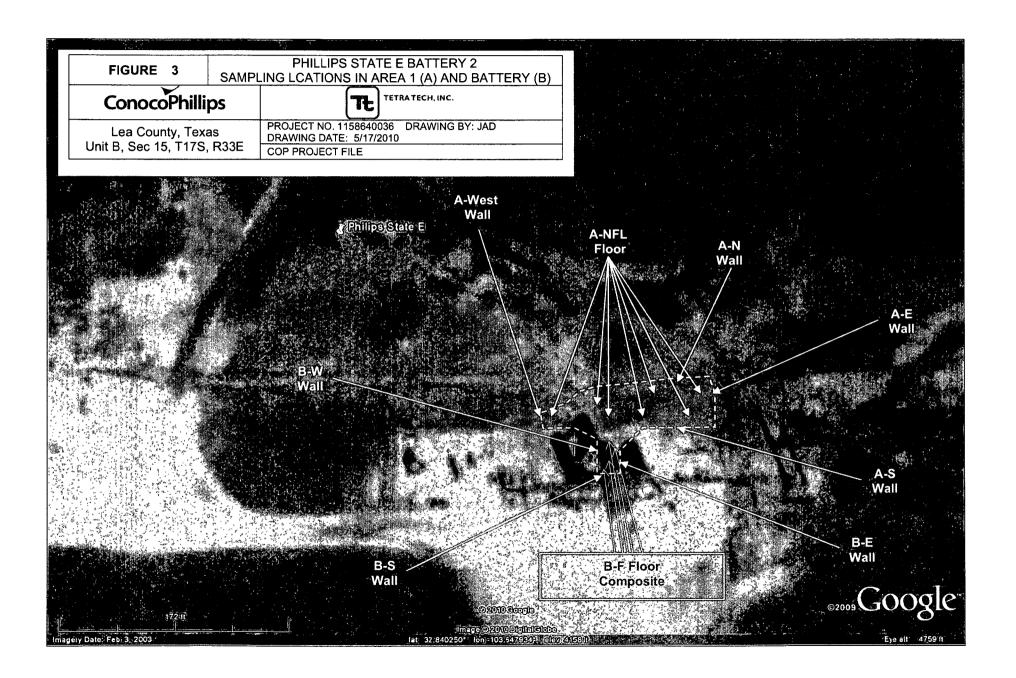


Source: Google Earth, 2008.





Source: Google Earth, 2008.



District I
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1RP 2584

Form C-141 Revised October 10, 2003

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

			Rele	ase Notific	atior	and Co	rrective A	ction	l					
						OPERA'	ГOR		☐ Initial Report					
				land, TX 70705				158						
Facility Nar	ne Phillip	s State E Ba	ttery 2			Facility Typ	e Battery							
Surface Ow	ner Sta	ate		Mineral C	wner	State			Lease N	lo. Al	PI 30-02	25-24543		
				LOCA	TIOI	OF REI	LEASE							
Unit Letter	Section	Township	Range	Feet from the	North/	South Line	Feet from the	East/V	Vest Line	County				
В	15	17 S	33 E					ļ		Lea				
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									Same					
Was Immedia	te Notice C													
		<u> </u>	Yes	No L Not Re	quired									
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was a watero	ourse Reac		Vac 🕅	No		If YES, Vo	lume Impacting t	he Wate	rcourse.					
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50' narrowing	to 20' X 9	00' affected a	rea on pas	ture land was rem	ediated.	. Geomembr	ane laid to protec	t ground	lwater.		,			
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Signature:	SH	111	(JaS	a										
Name of Company Contact John Gates Contact John Gates Contact John Gates														
Title:	HSER	Lead			A	Approval Date	::	E	Expiration I	Date:				
		.Gates@Cono				Conditions of	Approval:			Attached				
Date: 7/15/	/2010		Phone: 5	75-391-3158						L				

^{*} Attach Additional Sheets If Necessary

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