## RECEIVED



By OCD; Dr. Oberding at 11:02 am, Apr 01, 2015

### **CONOCOPHILLIPS**

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

**APPROVED** 

Conditionally

By OCD; Dr. Oberding at 11:02 am, Apr 01, 2015

OCD Stipulation: Concurence from BLM

## Britt B Battery

(1RP-3004)

## Termination Request

API No. 30-025-06111

Release Date: January 6<sup>th</sup>, 2014

Unit Letter E, Section 15, Township 20S, Range 37E





### **April 1, 2015**

### Dr. Tomáš Oberding, PhD

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

> RE: Termination Request ConocoPhillips Britt B Battery (1RP-3004) UL/E sec. 15 T20S R37E API No. 30-025-06111

Dr. Oberding:

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 3.6 miles southeast of Monument, New Mexico. Although the initial C-141 states that the site is located in UL/E, GPS mapping shows that the site is located in UL/F & K sec. 15 T20S R37E. Prior soil bore installation at the battery confirmed that there was no groundwater beneath the site.

On January 6<sup>th</sup>, 2014, CoP received a high level alarm from the separator at the battery. CoP discovered that a PRV on the production separator had popped off and released 8 barrels of oil over 1,305 square feet of battery lease pad. The line to the separator was shut in, and a vacuum truck was called to the site. The vacuum truck recovered 5 barrels of oil. NMOCD was notified of the release on January 7<sup>th</sup>, 2014, and an initial C-141 was approved by NMOCD on September 24<sup>th</sup>, 2014 (Appendix A).

RECS personnel were on site to visually assess the release September 16<sup>th</sup>, 2014. The release was mapped and photographed. Based on the assessment, a Corrective Action Plan (CAP) was submitted to NMOCD on December 11<sup>th</sup>, 2014, and was approved by NMOCD on the same day. The CAP stated that the release would be scraped down 6 inches bgs. Once the scrape was completed, a composite sample from the bottom of the scrape would be taken and field tested for chlorides and organic vapors. If the field data indicated that the composite would not achieve chloride, Gasoline Range Organics (GRO), Diesel Range Organics (DRO) and BTEX readings below regulatory standards, the scrape would be deepened until field testing indicated that all constituents from the bottom composite would return values below regulatory standards. The bottom composite would then be taken to a commercial laboratory to confirm that chloride, GRO, DRO and BTEX readings were below regulatory standards.

All excavated soils would be evaluated for use as backfill and any soils that did not meet regulatory standards would be taken to a NMOCD approved facility for disposal. Clean caliche would be imported to the site to replace any soils taken to disposal. A sample of the backfill soils would be taken to a commercial laboratory to confirm that the chloride reading was below regulatory standards. The scrape would then be backfilled and contoured to the surrounding location.

CAP activities began at the site on December 17<sup>th</sup>, 2014. The release area was scraped down to 6 inches, and a 5 point bottom composite was taken and field tested for chlorides and organic vapors (Figure 1). The 5 point bottom composite was then sent to a commercial laboratory for analysis. Laboratory analysis confirmed GRO, DRO and BTEX readings were below regulatory standards, while the chloride reading was slightly above regulatory standards, returning a value of 256 mg/kg (Appendix B). All excavated soil, a total of 60 cubic yards, was taken to a NMOCD approved facility for disposal. A total of 60 cubic yards of caliche was imported to the site to use as backfill. A composite sample of the imported caliche was taken to a commercial laboratory for analysis and returned a chloride value of 192 mg/kg. The site was backfilled according to a NMOCD notification sent January 8<sup>th</sup>, 2015 and NMOCD's response on January 9<sup>th</sup>, 2015 with the imported caliche and contoured to the surrounding location.

Photo documentation of field activities can be found in Appendix C.

Given that CoP has remediated the site as stated in the approved CAP, CoP respectfully 'remediation termination' and site closure. A final C-141 can be found in Appendix D.

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,

Lara Weinheimer

Project Scientist

RECS

(575) 441-0431

#### Attachments:

Figure 1 – Excavation Data

Appendix A – Initial C-141

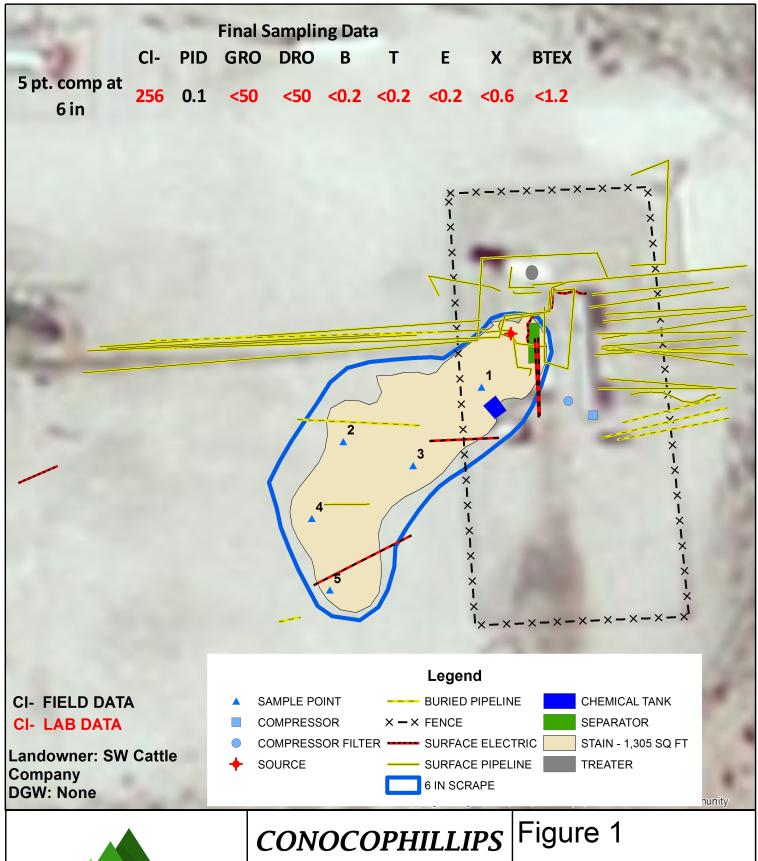
Appendix B – CAP Laboratory Analyses

Appendix C – Photo Documentation

Appendix D – Final C-141

# Figures

### **Excavation Data**

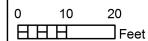




# BRITT B BATTERY

ULF&K SECTION 15 T-20-S R-37 E LEA COUNTY, NM





GPS date: 12/29/14 KS Drawing date: 12/30/14 Drafted by: L. Weinheimer



# Appendix A Initial C-141

Souriet I 623 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 (2275) St. Francis Dr., Santa Fe, MM 87505

Surface Owner: Federal Lease

Section

**20**S

Unit Letter

N/A

Type of Release: OIL

Was Immediate Notice Given?

By Whom? Jose A Zepeda

Wasja Watercourse Renched?

### State of New Mexico Energy Minerals and Natural Resources

Oil Conservation Division 1220 South St. Francis Dr. 4008880A

Form C-141 Revised August 8, 2011

Signo 150 only Mayoropriate District Office in accordance with 19.15.29 NMAC.

#### Santa Fe, NM 87505 RECEIVED Release Notification and Corrective Action **OPERATOR** Initial Report Final Report Name of Company: ConocoPhillips Contact: Jose A Zepeda Telephone No. 575-391-3165 Address: 1410 N West County Road Facility Type: Battery Facility Name: Britt B Battery API No. Fed Lse #LC031621B Mineral Owner: N/A 30-025-06111 LOCATION OF RELEASE Feet from the North/South Line | Feet from the East/West Line Township Range County 37E LEA Latitude Longitude NATURE OF RELEASE Volume of Release: 3.5 8 m Volume Recovered: 1.0 Source of Release: PRV on Production Separator Date and Hour of Occurrence Date and Hour of Discovery 01/06/14 0630 am SAME If YES, To Whom? ☐ Yes ☒ No ☐ Not Required Date and Hour: 01/07/2014 0655 If YES, Volume Impacting the Watercourse. ☐ Yes ☒ No If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

Describe Area Affected and Cleanup Action Taken.\*

On 01/06/14 @ ~0630 @ the Britt B Battery, there was an accidental discharge of ~8 bbls of oil from PRV on production separator. COPC MSO received a high level alarm for the separator. Upon arrival COPC MSO discovered a PRV on production separator that had popped off and spilled oil. Due to the freezing temperature the line troze and the PRV on the production separator popped off and spilled oil to ground. The line was shut in and vacuum truck was contacted. Vacuum Truck picked up 5 bbls of oil. The spill site will be remediated in place in accordance with GOPC and 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

rederal, state, or tocal laws and/or regulations.		
	OIL CONSERVA	ATION DIVISION
Signature: 905E A ZEPEDA		
Printed Name: Jose A Zepeda	Approved by Environmental Specialist:	
Title: LEAD HSE	Approval Date: 9-24-19 E	xpiration Date: 11-24-19
E-mail Address: Jose. A. Zepeda@conocophillips.com	Conditions of Approval:  5. te 3 mple repards  Below & restre area of  NMOCD grandes. Submit  Frank C-141. by 1824-19	Attached
Date: 01/06/2014 Phone: 575-391-3158	Nm OCD ander Subir	IRP-3009
Attach Additional Sheets If Necessary	Final 6-141. by 1824-19	Ogrid 217817
		NTO 1426 74101

NTO 1426 741065 P701426 741513

# Appendix B CAP Laboratory Analyses



December 23, 2014

KYLE NORMAN
RICE ENVIRONMENTAL CONSULTING & SAFETY LLC
419 W. CAIN
HOBBS, NM 88240

RE: BRIT B BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 12/22/14 8:50.

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 <a href="https://www.tceq.texas.gov/field/ga/lab">www.tceq.texas.gov/field/ga/lab</a> accred certif.html.

Cardinal Laboratories is accreditated 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.

Celey D. Keine

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,

Celey D. Keene

Lab Director/Quality Manager



### Analytical Results For:

RICE ENVIRONMENTAL CONSULTING & SAFETY

KYLE NORMAN 419 W. CAIN

HOBBS NM, 88240

Fax To: (575) 397-1471

Received: 12/22/2014 Sampling Date: 12/18/2014

Reported: 12/23/2014 Sampling Type: Soil

Project Name: BRIT B BATTERY Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Jodi Henson

Project Location: NOT GIVEN

### Sample ID: 5 PT BOTTOM COMP @ 6" (H403900-01)

BTEX 8021B	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.200 0.200		12/22/2014	ND	1.75	87.5	2.00	8.93	
Toluene*	<0.200	0.200	12/22/2014	ND	1.73	86.3	2.00	9.59	
Ethylbenzene*	<0.200	0.200	12/22/2014	ND	1.63	81.6	2.00	10.7	
Total Xylenes*	<0.600	0.600	12/22/2014	ND	4.90	81.7	6.00	11.5	
Total BTEX	<1.20	1.20	12/22/2014	ND					
Surrogate: 4-Bromofluorobenzene (PID	104 9	61-154	!						
Chloride, SM4500Cl-B	mg/	kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	256	16.0	12/22/2014	ND	400	100	400	3.92	
TPH 8015M	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<50.0	50.0	12/22/2014	ND	201	100	200	4.10	
DRO >C10-C28	<50.0	50.0	12/22/2014	ND	195	97.4	200	1.72	
Surrogate: 1-Chlorooctane	87.6	% 47.2-15	7						
Surrogate: 1-Chlorooctadecane	104 9	52.1-17	6						

Cardinal Laboratories \*=Accredited Analyte

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 client for analyses. All claims, including those for negligence and any other cause whistoever shall be deemed waived unless made in writing and received by Cardinal within thirty (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 the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results related only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celeg D. Keine



### **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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Celeg D. Freene



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

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Sampler Name:	Chris Flores	T.	Γ		MA	TRIX		PR	ESE	RV.	SAMPLING	-	0	T		Ĕ	ete					
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<sup>†</sup> Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476





January 16, 2015

LAURA FLORES RICE ENVIRONMENTAL CONSULTING & SAFETY LLC 419 W. CAIN

RE: BRITT B BATTERY

HOBBS, NM 88240

Enclosed are the results of analyses for samples received by the laboratory on 01/15/15 15:50.

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 <a href="https://www.tceq.texas.gov/field/ga/lab">www.tceq.texas.gov/field/ga/lab</a> accred certif.html.

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Method EPA 524.2 Total Trihalomethanes (TTHM)
Method EPA 524.4 Regulated VOCs (V1, V2, V3)

Celey D. Keine

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,

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: 01/15/2015 Sampling Date: 01/14/2015

Reported: 01/16/2015 Sampling Type: Soil

Project Name: BRITT B BATTERY Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Jodi Henson

Project Location: NOT GIVEN

### Sample ID: 5 PT COMP IMPORT CALICHE (H500154-01)

Chloride, SM4500Cl-B	mg/	'kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	192	16.0	01/16/2015	ND	432	108	400	3.77	

Cardinal Laboratories \*=Accredited Analyte

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Celey D. Keine



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Celeg D. Freene



### CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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<sup>†</sup> Cardinal cannot accept verbal changes. Please fax written changes to (575) 399-2326

# Appendix C Photo Documentation

# ConocoPhillips Britt B Battery Unit Letter E, Section 15, T20S, R37E



Source of the release, facing south

9/16/14





Initial site photo, facing northwest

9/16/14



Initial site photo, facing southeast

9/16/14



Shoveling release area, facing south

12/18/14



Exporting soil, facing west

12/18/14



Shoveling release area, facing northeast

12/18/14



Importing soil, facing north

12/18/14



Completed 6 in scrape, facing southeast





Site completed, facing northeast

1/5/15



Completed 6 in scrape, facing north

12/29/14



Site completed, facing southeast

1/5/15

# Appendix D Final C-141

District I 1625 N. French Dr., Hobbs, NM 88240 District II 811 S. First St., Artesia, NM 88210 District IV 1220 S. St. Francis Dr., Santa Fe, NM 87505

### State of New Mexico **Energy Minerals and Natural Resources**

Form C-141 Revised August 8, 2011

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

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

			Rele	ease Notific	ation	and Co	rrective A	ction	l							
						<b>OPERA</b>	ГOR	al Report	$\boxtimes$	Final Report						
		ConocoPhilli				Contact										
		st County Ro	oad			Telephone No.										
Facility Nar	ne Britt	B Battery			]	Facility Type Battery										
Surface Ow	ner Fede	ral Lease		Mineral O	wner N	er N/A API No. 30-025-06111										
				LOCA	TION	OF REI	LEASE									
Unit Letter	Section	Township	Range	Feet from the	North/	South Line	Feet from the	East/V	Vest Line	County						
Е	15	20S	37E							Lea	_					
			Lat	titude		_ Longitud	le									
				NAT	URE	OF RELI	EASE									
Type of Rele	ase OIL					Volume of	Release 8 BBL		Volume I	Recovered	5 BBI	L.				
Source of Re	lease PRV	on Production	n Separato	PΓ		Date and H 01/06/14	Iour of Occurrenc 0630 am	e	Date and Same	Hour of Dis	covery					
Was Immedia	nte Notice (		Yes 🏻	No 🗀 Not Rec	mired	If YES, To	Whom?	•								
By Whom?	Iose A Zer		- 40 14	110 🗀 11001100	14	Date and H	Iour 01/07/14 0	655								
Was a Water							lume Impacting t		rcourse.							
			Yes 🛚	No												
If a Watercou	rse was Im	pacted, Descri	be Fully.*	'N/A		•										
Describe Cau	se of Proble	em and Remed	dial Action	n Taken,*□On 02/	09/14 (	2 ~ 0807 am	(a) the BMT Batte	ry there	was an ac	cidental disc	harge.	COPC				
MSO receive	d a call that	he had a leak	at the BM	IT Battery. COPC	MSO a	urrived at loca	ation and noticed									
				to internal corrosi					1 DEGE	•						
visually asses	s the releas	e September 1	16 <sup>th</sup> , 2014.	en.*□ The release Based on the asses gan at the site on I	ssment,	a CAP was s	and was	approved								
				gan at the site on it chlorides and orga												
analysis. Lab	oratory ana	dysis confirme	ed GRO, I	ORO and BTEX re	adings	were below r	egulatory standar	ds, while	e the chlori	ide reading v	vas slig	htly above				
				/kg. All excavate												
				I to the site to use a due of 192 mg/kg.												
location.	anarysis a	io icidilica a c	inondo vi	nuc of 172 mg/kg.	1110 31	to mas backli	ned with the imp	onica ca	nene and e	ontourca to	uic suii	ounding				
I hereby certi				is true and comple												
				d/or file certain rel												
				e of a C-141 repor investigate and re												
				tance of a C 141 re												
		vs and/or regu			<u> </u>		<u> </u>			•						
						OIL CONSERVATION DIVISION										
Signature: /	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	/		Rea												
Printed Name	: De	enn;5		55	1	Approved by										
Title:		tion 5			-	Approval Dat	e:	F	Expiration 1	Date:						
	// _		/^	Qcol.co	m (	Conditions of	`Approval:			Attached	П	7				
Date: 3-3				-390-342	Attached 🗀											
Attach Addit	ional Shee															