CONSULTING AND REMEDIAL CONSTRUCTION

June 5, 2006

Mr. Larry Johnson New Mexico Oil Conservation Division 1625 French Drive Hobbs, NM 88240

## JORK YUAK Conoco Phillips Lockhart B-28 Well #6 (Ref. #15000 RE: UL-A (NE<sup>1</sup>/<sub>4</sub> of the NE<sup>1</sup>/<sub>4</sub>) of Section 28, T21S, R36E Latitude N 32° 27' 19.16" and Longitude W 103° 15'

Dear Mr. Johnson:

On July 17, 2004, a release of approximately 22 barrels (bbls) of crude oil and produced water occurred at the Lockhart B-28 Well #6 from a flow line due to overnight freezing. Upon discovery, ConocoPhillips retained a vacuum truck to recover approximately 15 bbls of free liquids and utilized a backhoe to excavate saturated soil from the well pad and spread sand on the impacted pasture area. The initial NMOCD C-141 indicated approximately 2,220-square feet of well pad and 1,200-square feet of pasture were impacted by the release. ConocoPhillips retained Environmental Plus, Inc. (EPI) in February 2005 to delineate the vertical and horizontal extent of impacted soil at the site. This letter report documents the results of the delineation activities and recommends how to proceed with the remediation of the impacted soil.

## Site Background

The site is located in the NE<sup>1</sup>/<sub>4</sub> of the NE<sup>1</sup>/<sub>4</sub> of Section 28, Township 21 South, Range36 East at an elevation of approximately 3,554 feet above mean sea level (reference Figures 1 and 2). The property owner is the U.S. Government- Bureau of Land Management. A search for area water wells was completed utilizing the New Mexico Office of the State Engineers website and a United States Geological Survey water well database. There were no records found for water wells in Section 28; a total of 14 wells were found in T21S. R36E. The average depth to water in these wells was reported to be approximately 140 feet (reference Table 1). No water supply wells or bodies of surface water were found to be located within a 1,000-foot radius of the release location. Based on available information it was determined that the distance between the contamination and groundwater was between >100 feet. Utilizing this information, it was determined the New Mexico Oil Conservation Division (NMOCD) Remedial Goals for this site were as follows:

Parameter	Remedial Goal
Benzene	10 parts per million
BTEX	50 parts per million
TPH	5,000 parts per million

Chloride residuals may not be capable of impacting groundwater above the NMWQCC groundwater standard of 250 mg/L.

## **Field Work**

EPI was on site February 2, 2005 to perform site assessment activities (i.e., photograph and GPS release area). To delineate the vertical and horizontal extent of impacted soil, on April 18, 2005, EPI personnel collected soil samples at six-inch and two-feet below ground surface (bgs) in seven sample locations. A portion of each sample was placed in a laboratory provided container and immediately placed on ice for transport. Select samples were submitted to Cardinal laboratories of Hobbs, New Mexico, for quantification

maident - n PACOG16547606			
(IN) MALION - APPICULIE ) TITOS	•••	EUNICE, NEW MEXICO 88231	
$\begin{array}{c} \begin{array}{c} \text{Tegephone 505.394.3481} \\ \text{OOH} \end{array} \end{array} $	FAX	505•394•2601	
RF 1 7/9			

of benzene, toluene, ethylbenzene and total xylenes (BTEX), gasoline range organics (GRO), diesel range organics (DRO) and chlorides.

The remaining portion of each sample were analyzed in the field for the presence of organic vapors utilizing a MiniRae<sup>®</sup> photoionozation detector (PID) equipped with a 10.6 electron-volt (eV) lamp and chloride concentrations utilizing a La Motte Chloride test kit.

## Analytical Data

Field analytical data indicated organic vapor concentrations ranged from 0.0 to 10.2 parts per million (ppm). Field chloride analyses indicated a range of 400 to 440 milligrams/kilogram (mg/Kg) in the release area and 400 mg/Kg in the background.

Laboratory analytical results indicated TPH and BTEX constituents were below each analytes' NMOCD remedial threshold (reference *Table 2*). Reported chloride concentrations ranged from 96 to 560 mg/Kg.

## **Conclusions**

Field and laboratory analyses indicated soil hydrocarbon concentrations were below each analytes' NMOCD remedial guidelines. Based on depth to groundwater (i.e., >100-ft), chloride residuals remaining in the soil will not be capable of impacting groundwater above the NMWQCC groundwater standard.

### **Recommendations**

Based on field and analytical results, it is recommended that soil within the release area be excavated to a maximum depth of two-feet bgs (i.e., 1,060-cubic yards) to prevent leaching/runoff from the well pad and to facilitate surface restoration in the pasture. Upon completion of excavation activities, excavated soil will be transported to a State approved facility for disposal. Upon completion of excavation activities, the excavation basin will be backfilled with clean soil obtained from an off-site source, contoured to allow natural drainage and seeded with a blend preferred by the BLM.

Should you have any questions or concerns, please feel free to contact me at (505) 394-3481 or via e-mail at <u>iolness@hotmail.com</u>. Upon your approval, EPI will initiate the next phase of the remediation. All official correspondence should be submitted to John Abney at:

John Abney, SHEAR Specialist Conoco Phillips 1410 Northwest County Road Hobbs, NM 88240

(505) 391-3128 John.H.Abney@conocophillips.com

Sincerely,

ENVIRONMENTAL PLUS, INC.

am

Iain A. Olness, P.G. Hydrogeologist

- cc: Paul Evans, BLM Carlsbad, NM John Abney, ConocoPhillips – Hobbs, NM C. John Coy, ConocoPhillips – Hobbs, NM File
- encl. Figure 1 Area Map Figure 2 – Site Location Map Figure 3 – Site Map Figure 4 – Sample Location Map Table 1 – Well Data Table 2 – Summary of Excavation Analytical Results Attachment I – Laboratory Results and Chain-of-Custody Form Photographs Attachment II – Copy of Initial C-141









**TABLE 1** 

.

.

## Well Data

# Conoco Phillips- Lockhart B-28 Well #6 (Ref. #150009)

Well Number	Diversion <sup>A</sup>	Оwner	Use	Source	Twsp	Rng	Sec q q q	Latitude	Longitude	Date Measured	Surface Elevation <sup>B</sup>	Depth to Water
											(ft amsl)	(ft bgs)
USGS #1	1		:	1	21 S	36 E	9 2 2 2	;	1	18-Mar-68	3,595	119.36
USGS #2		-	1	:	21 S	36 E	9 2 2 2			28-Feb-96	3,595	200.43
USGS #3	:	1	1		21 S	36 E	9 2 2 2	-	1	20-Mar-86	3,595	203.72
CP 00692 EXP	0	W. L. Van Noy	DOM	1	21 S	36 E	10 113	N 32° 29' 48.76"	W 103° 15' 40.54"	1	3,595	-
<b>CP</b> 00734	3	W. L. Van Noy	MOD	Shallow	21 S	36 E	10 1	N 32° 29' 35.71"	W 103° 15' 40.54"	22-Jun-88	3,585	200
CP 00685 ENLRG	0	Will J. McCasland	СОМ	:	21 S	36 E	11 42	N 32° 29' 22.71"	W 103° 13' 52.54"	1	3,565	1
CP 00685 (1) EXP	0	Chevron USA, Inc.	PRO	1	21 S	36 E	11 42	N 32° 29' 22.71"	W 103° 13' 52.54"	1	3,565	1
CP 00505	3	Snyder Ranches, Ltd.	STK	1	21 S	36 E	16 2	N 32° 28' 43.53"	W 103° 16' 11.43"	10-Jul-72	3,605	195
CP 00676	0	Joe E. Sims	DOM	Shallow	21 S	36 E	18 441	N 32° 28' 17.46"	W 103° 17' 59.37"	30-Apr-93	3,570	106
CP 00490 EXP	0	U. R. Cattle Company	STK	:	21 S	36 E	19 2 3	N 32º 27' 51.41"	W 103° 18' 14.75"	1	3,650	:
CP 00664	3	Dove Broadcasting, Inc.	SAN	Shallow	21S	-36 E	23 2.	N32°27 51 27°	W 103º 14' 07:98"	25-May-84	3537	- 150 <sup></sup>
	т. 3: "Э	Laymond Smith	DOM		21 S	36 E	23-2-	N 32° 27' 51 27"	W 103°-14" 07.98"		3.537	
CP 00484 (E)	3	Northern Natural Gas	SAN	Shallow	21 S	36 E	25 4 2	N 32° 26' 45.99"	W 103° 12' 51.03"	20-Jul-70	3,535	148
CP 00475 EXP	0	Ross Robinson	STK	:	21 S	36 E	30 422	N 32° 26' 46.01"	W 103° 17' 59.18"	-	3,620	1

\* = Data obtained from the New Mexico Office of the State Engineer Website (http://iwatcrs.ose.state.nn.us:7001/iWATERS/wr\_RegisServlet1) Shaded well information indicates well location shown on Figure 2

A = in acre feet per annum

<sup>B</sup> = Elevation interpolated from USGS topographical map based on referenced location.
DOM = Domestic
SAN = Sanitary
SAN = Sanitary
SAN = Sanitary
SAN = Commercial
EXP = Expired
EXP = Expired
EXP = Expired
Gamma = 1=NW, 2=NE, 3=SW, 4=SE; quarters are higgest to smallest

**TABLE 2** 

•

.

## **Summary of Excavation Analytical Results**

# Conoco Phillips- Lockhart B-28 Well #6 (Ref. #150009)

Soil Sample I.D,	Depth (feet)	Sample Date	Soil Status	PID Reading (ppm)	Field Chloride (mg/Kg)	Benzene (mg/Kg)	Toluene (mg/Kg)	Ethylbenzene (mg/Kg)	Total Xylenes (mg/Kg)	Total BTEX (mg/Kg)	TPH (as gasoline) (mg/Kg)	TPH (as diesel) (mg/Kg)	Total TPH (mg/Kg)	Chloride (mg/Kg)
A (6")	0.5	18-Apr-05	In Situ	0.9	:	:	-	1	:	;	;		;	;
A (2')	2	18-Apr-05	In Situ	3.9	400	1	1	1	:		1	1	1	400
B (6")	0.5	18-Apr-05	In Situ	318	;	<0.005	<0.005	0.2890	1.27	1.56	442	3,350	3,790	96
B (2')	2	18-Apr-05	In Situ	1.9	1	<0.005	<0.005	<0.005	<0.015	<0.03	<10.0	41.5	41.5	480
C (6")	0.5	19-Apr-05	In Situ	1.2	:	1	1		:	-	-	-	-	:
C (2')	2	18-Apr-05	In Situ	1.0	440	:	1	1	1	:		1	:	336
D (6")	0.5	18-Apr-05	In Situ	10.2	:	<0.005	<0.005	<0.005	<0.015	<0.03	<10.0	24.3	24.3	240
D (2')	2	18-Apr-05	In Situ	1.3	-	<0.005	<0.005	<0.005	<0.015	<0.03	<10.0	<10.0	<20.0	384
E (6")	0.5	18-Apr-05	In Situ	5.1	:	1	1	1	:	1	1	1	1	:
E (2')	2	18-Apr-05	In Situ	4.9		<0.005	<0.005	<0.005	<0.015	<0.03	<10.0	<10.0	<20.0	560
F (6")	0.5	18-Apr-05	In Situ	0.0	;	:	1	1	1			:	1	1
F (2')	2	18-Apr-05	In Situ	0.0	;	1	:		;				1	-
NMOC	CD Reme	NMOCD Remedial Thresholds	ds	100		10				50			5,000	250 <sup>A</sup>

Bolded values are in excess of NMOCD Remediation Thresholds

-- =Not Analyzed <sup>A</sup>Chloride residuals may not be capable of impacting local groundwater above the NMWQCC standards of 250 mg/L



PHONE (325) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR ENVIRONMENTAL PLUS, INC. ATTN: IAIN OLNESS P.O. BOX 1558 EUNICE, NM 88231 FAX TO: (505) 394-2601

Receiving Date: 04/18/05 Reporting Date: 04/23/05 Project Owner: CONOCO PHILLIPS Project Name: MEYER B-4 324 Project Location: 150009LOCKHART B-28 WELL #6 Sampling Date: 04/18/05 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: BC Analyzed By: BC

	GRO	DRO			ETHYL	TOTAL
LAB NUMBER SAMPLE ID	(C <sub>6</sub> -C <sub>10</sub> )	(>C <sub>10</sub> -C <sub>28</sub> )	BENZENE	TOLUENE	BENZENE	XYLENES
	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)
ANALYSIS DATE:	04/19/05	04/19/05	04/21/05	04/21/05	04/21/05	04/21/05
H9722-2 B(6")	442	3350	< 0.005	<0.005	0.289	1.27
H9722-3 B(2')	<10.0	41.5	< 0.005	< 0.005	<0.005	<0.015
H9723-5 D(6")	<10.0	24.3	< 0.005	<0.005	< 0.005	<0.015
H9723-6 D(2')	<10.0	<10.0	< 0.005	<0.005	< 0.005	<0.015
H9723-7 E(2')	(2') <10.0 <10.0 <0.005 <0.005 <0.005	<0.015				
Quality Control	772	805	0.093	0.095	0.092	0.275
True Value QC	800	800	0.100	0.100	0.100	0.300
% Recovery	96.5	101	92.6	95.2	91.6	91.8
Relative Percent Difference	3.9	2.6	2.1	8.0	3.0	8.1

METHODS: TPH GRO & DRO - EPA SW-846 8015 M; BTEX - SW-846 8260.

floope Burgess

H9722A.XLS

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 whatsoever 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 services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



PHONE (325) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR ENVIRONMENTAL PLUS, INC. ATTN: IAIN OLNESS P.O. BOX 1558 **EUNICE, NM 88231** FAX TO: (505) 394-2601

Receiving Date: 04/18/05 Reporting Date: 04/19/05 Project Owner: CONOCO PHILLIPS Project Name: MEYER B-4 324 Project Location: 150009LOCKHART B-28 WELL #6 Analysis Date: 04/19/05 Sampling Date: 04/18/05 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: BC Analyzed By: AH

C

4500-CI<sup>-</sup>B

LAB NUMBER	SAMPLE ID	(mg/Kg)
H9722-1*	A (2')	400
H9722-2	B (6")	96
H9722-3*	B (2')	480
H9722-4	C (2')	336
H9722-5*	D (6''')	240
H9722-6	D (2')	384
H9722-7*	E (2')	560
Quality Control		998
True Value QC		1000
% Recovery	·····	99.8
Relative Percent D	Difference	2.2

METHOD: Standard Methods Note: Analyses performed on 1:4 w:v aqueous extracts. \*Matrix interference (color) observed.

emist

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 whatsoever shall be deemed waived unless made in writing and received by **Cardinal** within the limitor (30) days after completion of the applicable service. In **Dy 22** at shall **Cardinal** within the limit of the another of the applicable service affinities 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.

## Cardinal Laboratories

2111 Beechwood, Abilene, TX 79603

505-393-2320 F8	Fax 505-393-2476				6	915-673-7001	7-2	201	Fax	( 91£	Fax 915-673-7020											
Company Name	Environmental Plus, Inc.	s, Inc.								<b>BIITO</b>	0		記録し			NN	SXJ	E SI	ANALYSIS, REQUEST	JES		
<b>EPI Project Manager</b>	ger lain Olness										da ana ao amin'ny tanàna mandritry amin'ny tanàna amin'ny taona 2008–2004. Ilay kaominina dia kaominina dia kao Jeografia					$\vdash$	┝	┢	┝	┡	L	
<b>Billing Address</b>	P.O. BOX 1558							L (	- Concerence							_						
City, State, Zip	Eunice New Mexico 88231	0 8823	H				)	5	5	Ş										1		 
EPI Phone#/Fax#	505-394-3481 / 505-394-2601	-394-2	601					AT	TN: -	Joh	ATTN: John Abney											
<b>Client Company</b>	ConocoPhillips						14	110	Wes	t Co	1410 West County Road											
Facility Name	Meyer B-4 324							ĭ	sddo	ñ, NA	Hobbs, NM 88240		_			_						
<b>Project Reference</b>	150009Lockhart B-28 Well #	28 We	)#   i	9											نگ اندو بید		_					 
<b>EPI Sampler Name</b>	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1											1			-							
		•			Ň	MATRIX			PRE	PRESERV.		SAMPLING										
LAB I.D.	SAMPLE I.D.	-9MO(Э) ЯО ВАЯ(Э)	# CONTRINERS	ABTAW GNUORD	RASTEWATER SOIL		SLUDGE	:ЯЭНТО	ACID/BASE		ратнея Вате Вате	3 Mit	BTEX 8021B	Maros Hgt	CHLORIDES (CI')	( <sup>1</sup> 02) SETATUS	Hq	LCLP	OTHER >>>		······	
H1 1-22724	A (2')	ច	-		×					×	18-Apr	8:06			×							<u> </u>
יע ב- קרי 15	2 B (6")	G	+		×					×	18-Apr	8:30	Х	Х	Х	_						
	3 <b>B (2')</b>	ឲ			×				$\square$	×	18-Apr	8:35	×	×	×		$\vdash$		_			
± √ ↓ ↓ ↓	4 C (2')	ឲ	-		×					×	18-Apr	8:50			×							
4	5 D (6")	G	-	-	×					×	18-Apr	9:15	×	×	×							
9 9 1	6 D (2')	U	-	$\dashv$	×					×	18-Apr	9:20	X	×	×							
	E (2')	G	<del>-</del>	-	×				_	×	18-Apr	9:35	X	×	×			-	_			
/ 8																						
6				┥					┥	-								_				-
10			$\neg$	-	_											_						
Sampler Relinquished:	Date Ross		ed By:						L F	<b>Fax Res</b> REMARKS:	Fax Results To lain Olness 505-394-2601 REMARKS:	1 Olness	505-3	94-2	601							
Retinquished by:	Date	Receiv		Received By: (lab staff)	staff) ZLA	A	Z	Ag														
Delivered by:	Samp	Sample Cool & Intact es	Intact No		2	Ċ	Checked By	:: B														



Photograph #1 – Lease sign.



**Photograph #2** – Looking down on point of release.



Photograph #3 – Point of release looking easterly.



Photograph #4 – Release area looking northerly.



Photograph #5 – Release area looking northeasterly.



**Photograph #6** – Release area looking northerly.

State of New Mexico Energy Minerals and Natural Resources

> 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

· · ·			Rel	ease Notifi		n and Co		ction				··
						<b>OPERA</b>	TOR	X	] Init	ial Report		Final Repor
Name of Co	ompany Co	onocoPhillip	S			Contact Joh	in Abney					
Address 1	410 N. W	est County I	Rd. Hobb	s NM. 88240			No. (505)391-3	128				
Facility Na	me Lockha	art B - 28 W	ell #6			Facility Typ	e Oil Well					
Surface Ow	merBLM			Mineral	Owner	BLM			Lease ]	No. NM-90	162	
				LOC	АТТО	N OF RE	LEASE A	P1#300	as a	1814 000	0	
Unit Letter	Section	Township	Range	Feet from the		/South Line	Feet from the	East/Wes		County		
Α	28	215	36E	1650	Sout	h	1650	East		Lea		$\frown$
L	.I		J I.a	titude		Longitud		<u> </u>			ch.	62
					TRE	OF REL	<u></u>			4	40	BEY
Type of Rele	ase Oil an	d Produced	water	1,11,41			Release 22 bbls	V	olume I	Recovered 1		P
Source of Re	leaseFlow	line					lour of Occurrence	æ7/17/04D	ainand	Hour of Dis	covery'	7/17/04 8a
Was Immedia	ate Notice (	Given?	Yes [	No 🛛 Not R	equired	If YES, To NA	Whom?					
By Whom?		······				Date and H						
Was a Water	course Read		Yes 🛛	l NT-		If YES, Vo	lume Impacting t	the Waterco	urse.			
						NA						
1	irse was Im	pacted, Descr	ibe Fully.'	E Contraction of the second								
NA												
											0	
Describe Cau	se of Proble	em and Reme	dial Action	1 Taken.*							<u> </u>	
Flowline ru	ptured due	e to extreme	ly low nig	t time tempra	tures.					10	9 <b>0</b> /	i.
	-			-						- 7(6 , U	ala	
										12	720	
Describe Area Affected and Cleanup Action Taken.* Area affected was 30' X 72' of well pad and 100' X 12' area of pasture land. A vacuum truck was called to pickup the free liquids. We recovered 2 bbl of oil and 13 bbls of water. A backhoe was used to back drag the well pad and spread snad over the contaminated area of												
Area affecte	d was 30'	X 72' of wel	ll pad and of water	1 100' X 12' are	a of pa	sture land. A	vacuum truck	was called	to picl	kup the free	e liquid	is. We
pasture due	to cattle in	n the area. T	he site w	ill be delineated	to det	ermine the n	ecessary remed	iation activ	0 <b>n</b> .		mmau	
I hereby certi	fy that the i	nformation gi	ven above	is true and comp	lete to t	he best of my	knowledge and m	nderstand ti	nat nurs	uant to NMC		les and
regulations al	l operators	are required to	o report ar	d/or file certain r	elease n	otifications an	d perform correct	tive actions	for rele	ases which r	nay end	danger
public health	or the envi	ronment. The	acceptance	e of a C-141 repo	ort by th	e NMOCD ma	rked as "Final Ro	eport" does	not reli	eve the operation	ator of 1	liability
or the enviror	ment. In a	ddition. NMC	CD accent	investigate and retained of a C-141	emediai report d	e contamination	the operator of r	at to groun	d water	, surface wat	er, hun	other
federal, state,	or local lay	ws and/or regu	ilations.							-		
		7/ 11					OIL CONS	SERVAT	ION	DIVISIO	N	
Signature:	6	in Um	in			WORLPU	ANS SUIZE	GARER	$\bigcirc$			
_			$\mathcal{O}^{-}$				District Supervise		$\int \int dx$	0	* :	
Printed Name	John Abr	ney					1	ور ک		IL Son		
Title: SHE	AR Specia	list				Approval Date	: 6·B·O	6 Expi	ration I	Date:		
E-mail Addre	ss: John.H.	Abney@con	nocophilli	ps.com		Conditions of	Approval:			Attached	п	
Date: 01/31/				(505)391-3128						Autoriou	Ч	
Attach Addit	ional Shee	ts If Necess	ary							·		