



CONOCOPHILLIPS

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

VGEU Well 02-27

1RP-3116

Corrective Action Plan

API No. 3002538346

Release Date: June 15th, 2014

Unit Letter G, Section 32, Township 17S, Range 35E

August 11th, 2014

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: Corrective Action Plan
ConocoPhillips VGEU Well 02-27 (1RP-3116)
UL/G sec. 32 T17S R35E
API No. 3002538346**

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 1.8 miles southeast of Buckeye, New Mexico. Although the C-141 states that the release is located in UL/G, GPS mapping shows the release to be located in UL/F of sec. 32 T17S R35E. NM OSE, BLM and Non-COP monitor well records indicate that groundwater will likely be encountered at a depth of approximately 64 +/- feet.

On June 15th, 2014, a hole was found in a flow line, which released 92 barrels of oil over 9,874 square feet of pasture land. A total of 50 barrels of this fluid was recovered. The well was shut in and the line repaired. NMOCD was notified of the release on June 16th, 2014, and an initial C-141 was sent to NMOCD for their approval (Appendix A).

RECS personnel were on site beginning on July 14th, 2014. Four points within the release area were sampled at the surface, and three of the points were sampled with depth (Figure 1). The samples were field tested for chlorides and organic vapors, and representative samples were taken to a commercial laboratory for analysis (Appendix B). The laboratory analysis showed elevated chlorides and hydrocarbons at Point 1 and Point 2. Given the dramatic drop in chlorides and hydrocarbons in Point 2 between the surface sample and the 6 inches bgs sample, there is a high probability that the area around Point 1 and Point 2 will obtain chloride and hydrocarbon values below regulatory standards fairly quickly with continued depth. Point 3 and Point 4 returned laboratory chloride and hydrocarbon readings below regulatory standards at the surface and at 6 inches bgs.

Corrective Action Plan

Based on the laboratory analysis, the area around Point 3 and Point 4 will be scraped down to 6 inches bgs to remove the visible staining. The area around Point 1 and Point 2 will be scraped down until field sampling indicates that all constituents will return laboratory readings below regulatory standards (Figure 2). Once this occurs, a bottom composite of the scrape around Point 1 and Point 2 will be taken to a commercial laboratory to confirm that chloride, Gasoline Range Organics (GRO), Diesel Range Organics (DRO) and BTEX levels are below regulatory standards.

All excavated soils will be evaluated for use as backfill, and any soils that do not meet regulatory standards will be taken for disposal at a NMOCD approved site. Clean soil will be imported to the site to replace any soils taken for disposal. The clean soil will be blended with the excavated soil for use as backfill. A sample of the blended soil will be taken to a commercial laboratory to confirm that chloride, GRO and DRO values are below regulatory standards. The scrapes will be backfilled with blended soil and contoured to the surrounding location. The site will then be seeded with a blend of native vegetation.

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

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 – Initial Sampling Data
- Figure 2 – Proposed Corrective Actions
- Appendix A – Initial C-141
- Appendix B – Initial Sampling Lab
- Appendix C – Photo Documentation

Figures

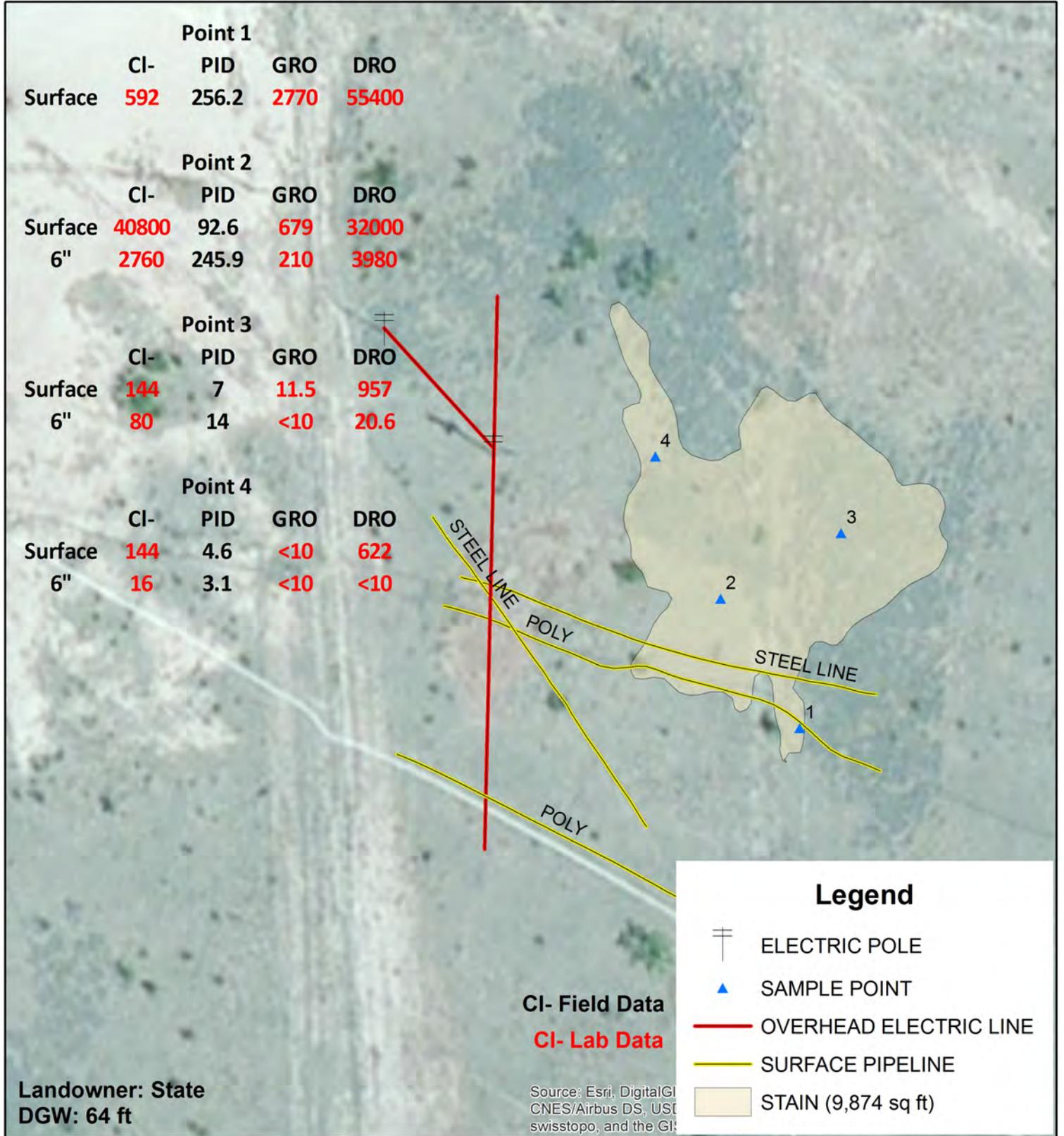
Initial Sampling Data

Point 1				
	Cl-	PID	GRO	DRO
Surface	592	256.2	2770	55400

Point 2				
	Cl-	PID	GRO	DRO
Surface	40800	92.6	679	32000
6"	2760	245.9	210	3980

Point 3				
	Cl-	PID	GRO	DRO
Surface	144	7	11.5	957
6"	80	14	<10	20.6

Point 4				
	Cl-	PID	GRO	DRO
Surface	144	4.6	<10	622
6"	16	3.1	<10	<10



Legend

- ELECTRIC POLE
- SAMPLE POINT
- OVERHEAD ELECTRIC LINE
- SURFACE PIPELINE
- STAIN (9,874 sq ft)

CI- Field Data
 CI- Lab Data

Source: Esri, DigitalGlobe, GeoEye, IGN, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, swisstopo, and the GIS User Community

Landowner: State
 DGW: 64 ft

RECS
 RICE ENVIRONMENTAL
 CONSULTING & SAFETY

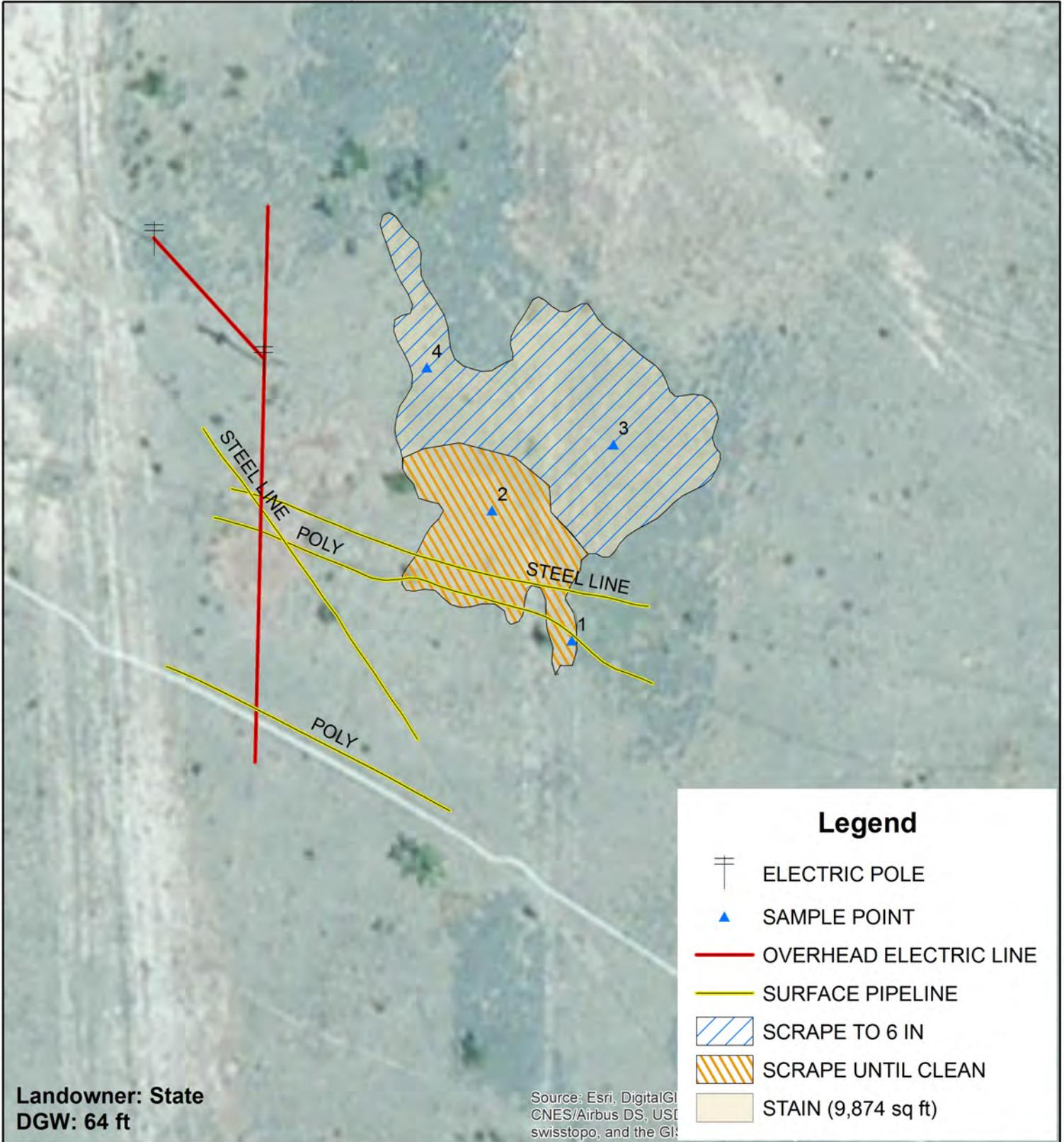
CONOCOPHILLIPS
VGEU WELL 02-27

UL F SECTION 32
 T-17-S R-35-E
 LEA COUNTY, NM

Figure 1

GPS date: 7/14/14 KS
 Drawing date: 7/30/14
 Drafted by: L. Weinheimer

Proposed Corrective Actions



**CONOCOPHILLIPS
VGEU WELL 02-27**

UL F SECTION 32
T-17-S R-35-E
LEA COUNTY, NM

Figure 2

0 50 100
Feet

GPS date: 7/14/14 KS
Drawing date: 7/28/14
Drafted by: T. Grieco/L. Weinheimer

Appendix A

Initial C-141

RICE Environmental Consulting and Safety (RECS)
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
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

HOBBS OCD

Form C-141
Revised August 8, 2011

JUN 16 2014
Submit 1 Copy to appropriate District Office in
accordance with 19.15.29 NMAC.

RECEIVED

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company: ConocoPhillips	Contact: Spencer Cluff
Address: 29 Vacuum Complex Lane	Telephone No. 575-391-3143
Facility Name: VGEU Well 02-27	Facility Type: Oil Well

Surface Owner: NMOCD	Mineral Owner NMOCD	API No. 3002538346
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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	32	17S	35E	2617	North	1725	East	LEA

Latitude 32.7915536994735 Longitude - 103.47689377028

NATURE OF RELEASE

Type of Release: Spill	Volume of Release: 92 BBLS	Volume Recovered: 50 BBLS
Source of Release: Flow Line	Date and Hour of Occurrence 6/15/2014 10:00 p.m.	Date and Hour of Discovery 6/16/2014 10:00 a.m.
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Geoffrey Leking	
By Whom? Spencer Cluff	Date and Hour: 06/16/2014 4:15 p.m.	
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.* *Depth to g H₂O 7100'*

Describe Cause of Problem and Remedial Action Taken.* On Sunday, June 15, 2014 @ 2200 hrs. MST @ the VGEU 02-27 an accidental discharge of 29 BO occurred. While making daily rounds checking wells, MSO received a call from another MSO saying he found a hole in flow line. Spill area was 243 ft. X 213 ft. X 0.5 inches deep, all in pastor area. MSO turned shut in the well and closed tubing and casing to isolate well. A work order to repair the hole has been submitted. The affected area will be remediated according to NMOCD guidelines.

Describe Area Affected and Cleanup Action Taken.* Spill area was 243 ft. X 213 ft. X 0.5 inches deep, all in pastor area. MSO turned shut in the well and closed tubing and casing to isolate well. A work order to repair the hole has been submitted. 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.

Signature: <i>Spencer A. Cluff</i>	OIL CONSERVATION DIVISION	
Printed Name: Spencer Cluff	Approved by Environmental Specialist:	
Title: LEAD HSE	Approval Date: 6-26-14	Expiration Date: 8-21-14
E-mail Address: spencer.a.cluff@conocophillips.com	Conditions of Approval: <i>Site Samples required. Delimitate & remediate the area as per NMOCD guides.</i>	Attached <input type="checkbox"/>
Date: 06/16/2014	Phone: 575-391-3143	<i>Submit final C-141 by 8-21-14</i>

* Attach Additional Sheets If Necessary

*ogrid 27817
nTD 141752105
PTO 1417 752948*

JUN 30 2014

Appendix B

Initial Sampling Lab

RICE Environmental Consulting and Safety (RECS)
P.O. Box 2948 Hobbs, NM 88241
Phone 575.393.2967



July 29, 2014

LAURA FLORES

RICE ENVIRONMENTAL CONSULTING & SAFETY LLC

419 W. CAIN

HOBBS, NM 88240

RE: VGEU #02-27

Enclosed are the results of analyses for samples received by the laboratory on 07/22/14 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 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 "Mike Snyder". The signature is fluid and cursive, with the first name "Mike" and last name "Snyder" clearly legible.

Mike Snyder For 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:	07/22/2014	Sampling Date:	07/14/2014
Reported:	07/29/2014	Sampling Type:	Soil
Project Name:	VGEU #02-27	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVNE	Sample Received By:	Kathy Perez
Project Location:	COP		

Sample ID: POINT 1 @ SURFACE (H402227-01)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	592	16.0	07/28/2014	ND	416	104	400	3.92		
TPH 8015M		mg/kg		Analyzed By: MS						S-06
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	2770	200	07/24/2014	ND	194	97.0	200	1.39		
DRO >C10-C28	55400	200	07/24/2014	ND	203	101	200	3.56		
<i>Surrogate: 1-Chlorooctane</i>	935 %	65.2-140								
<i>Surrogate: 1-Chlorooctadecane</i>	561 %	63.6-154								

Sample ID: POINT 2 @ SURFACE (H402227-02)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	40800	16.0	07/28/2014	ND	416	104	400	3.92		
TPH 8015M		mg/kg		Analyzed By: MS						S-06
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	679	100	07/24/2014	ND	194	97.0	200	1.39		
DRO >C10-C28	32000	100	07/24/2014	ND	203	101	200	3.56		
<i>Surrogate: 1-Chlorooctane</i>	380 %	65.2-140								
<i>Surrogate: 1-Chlorooctadecane</i>	388 %	63.6-154								

Cardinal Laboratories

*=Accredited Analyte

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Mike Snyder For 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:	07/22/2014	Sampling Date:	07/14/2014
Reported:	07/29/2014	Sampling Type:	Soil
Project Name:	VEGU #02-27	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVNE	Sample Received By:	Kathy Perez
Project Location:	COP		

Sample ID: POINT 3 @ SURFACE (H402227-03)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	144	16.0	07/28/2014	ND	400	100	400	0.00	
TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	11.5	10.0	07/24/2014	ND	194	97.0	200	1.39	
DRO >C10-C28	957	10.0	07/24/2014	ND	203	101	200	3.56	

Surrogate: 1-Chlorooctane 116 % 65.2-140

Surrogate: 1-Chlorooctadecane 147 % 63.6-154

Sample ID: POINT 4 @ SURFACE (H402227-04)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	144	16.0	07/28/2014	ND	400	100	400	0.00	
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	07/24/2014	ND	194	97.0	200	1.39	
DRO >C10-C28	622	10.0	07/24/2014	ND	203	101	200	3.56	

Surrogate: 1-Chlorooctane 122 % 65.2-140

Surrogate: 1-Chlorooctadecane 143 % 63.6-154

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Analytical Results For:

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 LAURA FLORES
 419 W. CAIN
 HOBBS NM, 88240
 Fax To: (575) 397-1471

Received:	07/22/2014	Sampling Date:	07/14/2014
Reported:	07/29/2014	Sampling Type:	Soil
Project Name:	VEGU #02-27	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVNE	Sample Received By:	Kathy Perez
Project Location:	COP		

Sample ID: POINT 2 @ 6" (H402227-05)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	2760	16.0	07/28/2014	ND	400	100	400	0.00	
TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	210	50.0	07/24/2014	ND	194	97.0	200	1.39	
DRO >C10-C28	3980	50.0	07/24/2014	ND	203	101	200	3.56	

Surrogate: 1-Chlorooctane 168 % 65.2-140

Surrogate: 1-Chlorooctadecane 113 % 63.6-154

Sample ID: POINT 3 @ 6" (H402227-06)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	07/28/2014	ND	400	100	400	0.00	
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	07/24/2014	ND	194	97.0	200	1.39	
DRO >C10-C28	20.6	10.0	07/24/2014	ND	203	101	200	3.56	

Surrogate: 1-Chlorooctane 126 % 65.2-140

Surrogate: 1-Chlorooctadecane 139 % 63.6-154

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 LAURA FLORES
 419 W. CAIN
 HOBBS NM, 88240
 Fax To: (575) 397-1471

Received:	07/22/2014	Sampling Date:	07/14/2014
Reported:	07/29/2014	Sampling Type:	Soil
Project Name:	VEGU #02-27	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVNE	Sample Received By:	Kathy Perez
Project Location:	COP		

Sample ID: POINT 4 @ 6" (H402227-07)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	07/28/2014	ND	400	100	400	0.00	

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	07/24/2014	ND	194	97.0	200	1.39	
DRO >C10-C28	<10.0	10.0	07/24/2014	ND	203	101	200	3.56	

<i>Surrogate: 1-Chlorooctane</i>	<i>115 %</i>	<i>65.2-140</i>
<i>Surrogate: 1-Chlorooctadecane</i>	<i>130 %</i>	<i>63.6-154</i>

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Mike Snyder For 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

Cardinal Laboratories

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager

Appendix C

Photo Documentation

RICE Environmental Consulting and Safety (RECS)
P.O. Box 2948 Hobbs, NM 88241
Phone 575.393.2967

ConocoPhillips VGEU Well 02-27

Unit Letter F, Section 32, T17S, R35E



Initial release area, facing west

7/14/14



Initial release area, facing southeast

7/14/14



Auguring for depth, facing northwest

7/14/14