



CONOCOPHILLIPS

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

MCA Well #273 (1RP-3371)

Corrective Action Plan

API No. 30-025-23730

Release Date: December 12th, 2013

Unit Letter L, Section 26, Township 17S, Range 32E

October 21st, 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 MCA Well #273 (1RP- 3371)
UL/L sec. 26 T17S R32E
API No. 30-025-23730

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 south of Maljamar, New Mexico at UL/L sec. 26 T17S R32E. NM OSE and BLM records indicate that groundwater will likely be encountered at a depth of approximately 66 +/- feet.

On December 12th, 2013, CoP discovered a small hole on a 2 inch fiberglass injection line. The spill amount was 21 barrels of produced water with none recovered. The release covered 3,315 square feet of pasture land (Figure 1). NMOCD and BLM were notified of the release on December 12th, 2013 and an initial C-141 was sent to both parties for their approval (Appendix A).

RECS personnel were on site to visually assess the release on September 4th, 2014. The release was mapped and photographed. RECS personnel conducted two verticals on October 2nd, 2014. Vertical 1 returned a surface sample laboratory chloride reading of 160 mg/kg. The 3 ft bgs sample returned a laboratory chloride reading of 5,440 mg/kg. At the base of the vertical, the 9 ft bgs returned a laboratory chloride reading of 880 mg/kg. Gasoline Range Organics (GRO), Diesel Range Organics (DRO), and BTEX readings returned values of non-detect at all depths. Vertical 2 returned laboratory chloride, GRO, DRO, and BTEX readings of non-detect at all depths, except at 1 ft bgs, where the DRO sample returned a value of 2,310 mg/kg (Appendix B).

Photo documentation of the release area and field activities can be found in Appendix C.

Corrective Action Plan

Based on the laboratory analysis of the site, the area around Vertical 1 will be excavated down to 4 ft bgs. At the base of the excavation, a 20-mil reinforced poly liner will be installed and properly seated. The area around Vertical 2 will be scraped down to 1 ft bgs. Once the scrape is completed, a 3 point composite sample from the bottom of the scrape will be taken and field tested for chlorides and organic vapors. If the field data indicates that the composite will not achieve chloride, GRO, DRO and BTEX readings below regulatory standards, the scrape will be deepened until field testing indicates that all constituents from the bottom composite will be below regulatory standards. The bottom composite will then be taken to a commercial laboratory to confirm that chloride, GRO, DRO and BTEX readings 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 to a NMOCD approved facility for disposal. Top soil will be imported to the site to replace any soils taken for disposal. A sample of the backfill will be taken to a commercial laboratory to confirm that the chloride reading is below regulatory standards. The area will be backfilled and contoured to the surrounding location. Once the site has been backfilled, the disturbed area will be seeded with a blend of native vegetation.

Once these activities have been completed, a report will be sent to NMOCD and BLM 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:

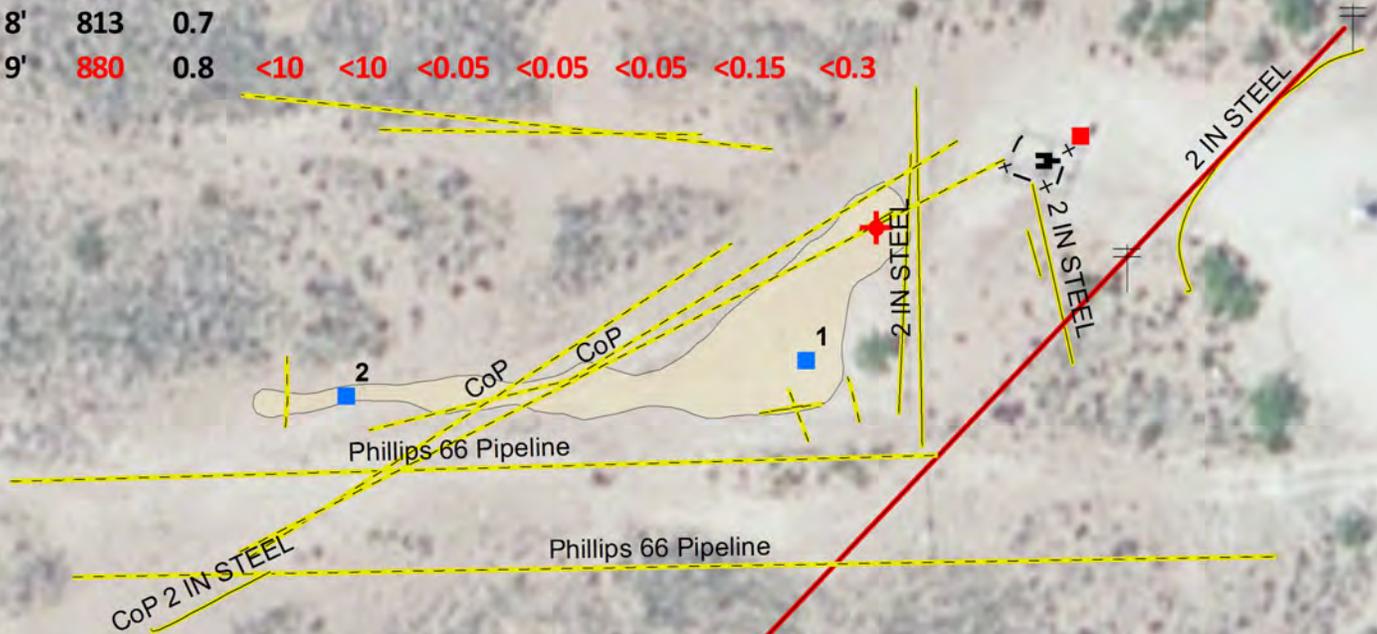
- Figure 1– Initial Sampling Data
- Figure 2– Proposed Corrective Actions
- Appendix A – Initial C-141
- Appendix B – Initial Sampling Labs
- Appendix C – Photo Documentation

Figures

Initial Sampling Data

Vertical 1

	CI-	PID	GRO	DRO	B	T	E	X	BTEX
SS	160	0.1	<10	<10	<0.05	<0.05	<0.05	<0.15	<0.3
1'	210	0.2							
2'	1471	0.3							
3'	5440	0.5	<10	<10	<0.05	<0.05	<0.05	<0.15	<0.3
4'	3018	0.5							
5'	1399	0.5							
6'	1564	0.4							
7'	915	0.6							
8'	813	0.7							
9'	880	0.8	<10	<10	<0.05	<0.05	<0.05	<0.15	<0.3



Vertical 2

	CI-	PID	GRO	DRO	B	T	E	X	BTEX
SS	<16	0.4	<10	<10	<0.05	<0.05	<0.05	<0.15	<0.3
1'	<16	0.2	<10	2310	<0.05	<0.05	<0.05	<0.15	<0.3
2'	<16	0.5	<10	<10	<0.05	<0.05	<0.05	<0.15	<0.3

Legend

■ VERTICAL	■ ELECTRICAL BOX	× - × - × FENCE
ELECTRIC POLE	HEADER	OVERHEAD ELECTRIC LINE
	SOURCE	SURFACE PIPELINE
	BURIED PIPELINE	STAIN- 3315 SQ FT

Landowner: BLM
DGW: 66 ft

CONOCOPHILLIPS MCA WELL #273

UL L SECTION 26
T-17-S R-32-E
LEA COUNTY, NM

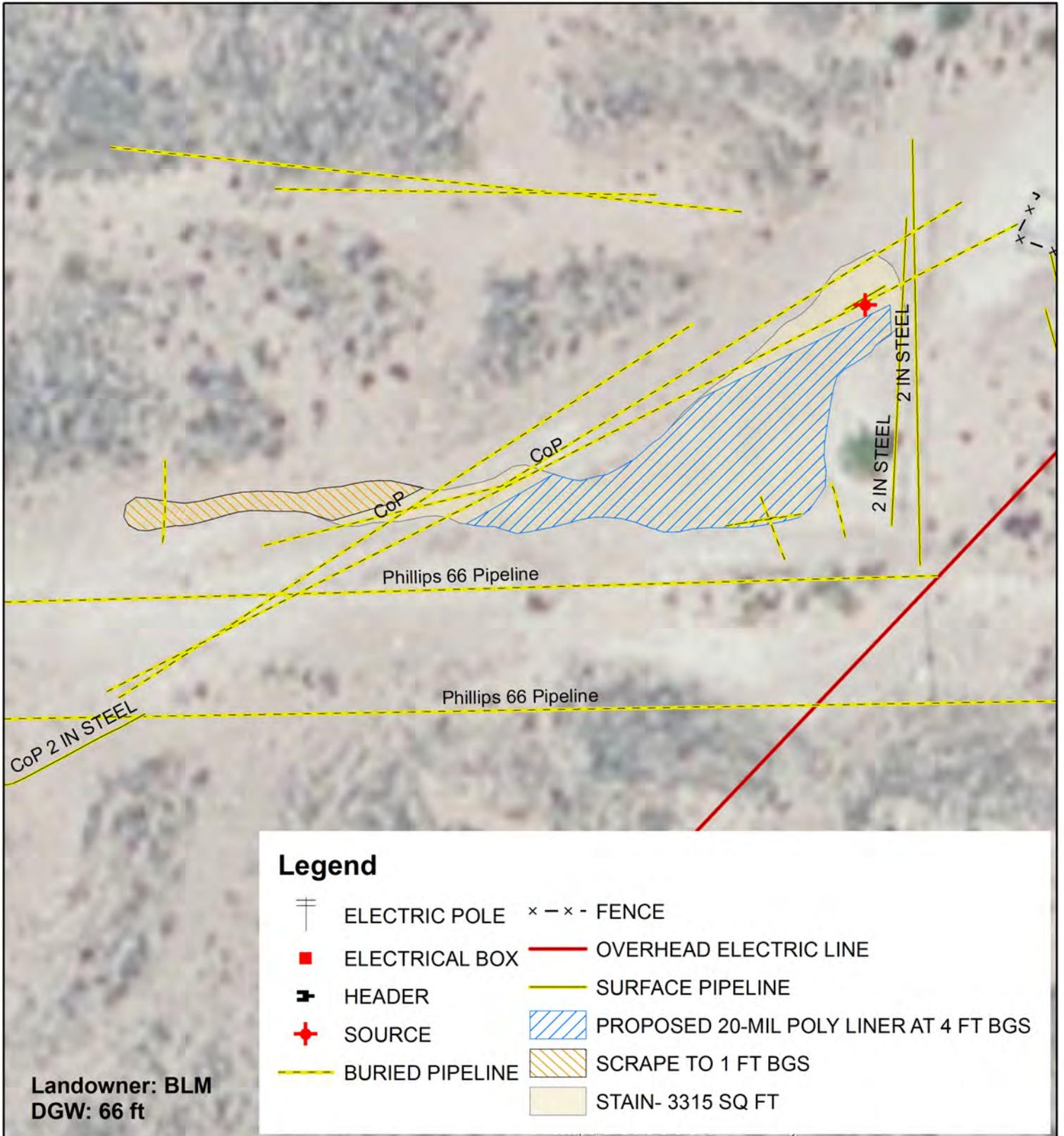
Figure 1

0 25 50
 Feet

GPS date: 9/4/14 & 10/2/14 CF
Drawing date: 10/3/14, 10/10/14
Drafted by: T. Grieco, L. Weinheimer



Proposed Corrective Actions



CONOCOPHILLIPS MCA WELL #273

UL L SECTION 26
T-17-S R-32-E
LEA COUNTY, NM

Figure 2

0 10 20
HHH Feet

GPS date: 9/4/14 & 10/2/14 CF
Drawing date: 10/3/14, 10/10/14
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

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.

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company: ConocoPhillips	Contact: David May
Address: 29 Vacuum Complex Lane	Telephone No. 575-391-3106
Facility Name: MCA Well #273	Facility Type: Water Injection

Surface Owner: BLM	Mineral Owner BLM	API No. 300252373000
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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
L	26	17S	32E	1980	South	560	west	LEA

Latitude 32.8036924268663 Longitude - 103.743849216684

NATURE OF RELEASE

Type of Release: Spill	Volume of Release: 21 BBLS	Volume Recovered: 0 BBLS
Source of Release: 2 inch fiberglass Injection line	Date and Hour of Occurrence: 12/12/13 10:30 am	Date and Hour of Discovery: SAME
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Duncan Whitlock/Geoffrey Leking	
By Whom? David May	Date and Hour: 12/12/13 3:30 pm	
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.*

Describe Cause of Problem and Remedial Action Taken.*

Accidental discharge on a 2 inch fiberglass injection line for the MCA well #273 due to a small hole in the line. Spill amount was 21 BPW with 0 BPW recovered. MSO isolated valves at the header and well. Affected area was 300 Ft X 30 Ft. Spill will be remediated according to BLM and NMOCD requirements.

Describe Area Affected and Cleanup Action Taken.*

Affected area was 300 Ft X 30 Ft. Spill will be remediated according to BLM and NMOCD requirements.

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.

<u>OIL CONSERVATION DIVISION</u>	
Signature:	Approved by Environmental Specialist:
Printed Name: David May	Approval Date:
Title: LEAD HSE	Expiration Date:
E-mail Address: david.d.may@conocophillips.com	Conditions of Approval:
Date: 12/12/2013 Phone: 575-391-3106	Attached <input type="checkbox"/>

* Attach Additional Sheets If Necessary

Appendix B

Initial Sampling Labs

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



October 06, 2014

LAURA FLORES

RICE ENVIRONMENTAL CONSULTING & SAFETY LLC

419 W. CAIN

HOBBS, NM 88240

RE: MCA WELL #273

Enclosed are the results of analyses for samples received by the laboratory on 10/03/14 8:35.

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 "Celey D. Keene". The signature is written in a cursive style with a large, flowing "C" and "K".

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:	10/03/2014	Sampling Date:	10/02/2014
Reported:	10/06/2014	Sampling Type:	Soil
Project Name:	MCA WELL #273	Sampling Condition:	Cool & Intact
Project Number:	COP	Sample Received By:	Jodi Henson
Project Location:	NONE GIVEN		

Sample ID: VERTICAL 1 @ SURFACE (H403026-01)

BTEX 8021B		mg/kg		Analyzed By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/03/2014	ND	1.90	95.2	2.00	2.17	
Toluene*	<0.050	0.050	10/03/2014	ND	1.83	91.4	2.00	0.748	
Ethylbenzene*	<0.050	0.050	10/03/2014	ND	1.71	85.4	2.00	2.04	
Total Xylenes*	<0.150	0.150	10/03/2014	ND	5.04	84.0	6.00	2.57	
Total BTEX	<0.300	0.300	10/03/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 97.5 % 61-154

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	160	16.0	10/03/2014	ND	416	104	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	10/03/2014	ND	178	89.0	200	1.40	
DRO >C10-C28	<10.0	10.0	10/03/2014	ND	188	93.9	200	0.594	

Surrogate: 1-Chlorooctane 88.0 % 47.2-157
Surrogate: 1-Chlorooctadecane 96.1 % 52.1-176

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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 RICE ENVIRONMENTAL CONSULTING & SAFETY |
 LAURA FLORES
 419 W. CAIN
 HOBBS NM, 88240
 Fax To: (575) 397-1471

Received:	10/03/2014	Sampling Date:	10/02/2014
Reported:	10/06/2014	Sampling Type:	Soil
Project Name:	MCA WELL #273	Sampling Condition:	Cool & Intact
Project Number:	COP	Sample Received By:	Jodi Henson
Project Location:	NONE GIVEN		

Sample ID: VERTICAL 1 @ 3' (H403026-02)

BTEX 8021B		mg/kg		Analyzed By: ms						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	10/03/2014	ND	1.90	95.2	2.00	2.17		
Toluene*	<0.050	0.050	10/03/2014	ND	1.83	91.4	2.00	0.748		
Ethylbenzene*	<0.050	0.050	10/03/2014	ND	1.71	85.4	2.00	2.04		
Total Xylenes*	<0.150	0.150	10/03/2014	ND	5.04	84.0	6.00	2.57		
Total BTEX	<0.300	0.300	10/03/2014	ND						

Surrogate: 4-Bromofluorobenzene (PID) 99.5 % 61-154

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	5440	16.0	10/03/2014	ND	416	104	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	10/03/2014	ND	178	89.0	200	1.40		
DRO >C10-C28	<10.0	10.0	10/03/2014	ND	188	93.9	200	0.594		

Surrogate: 1-Chlorooctane 86.5 % 47.2-157

Surrogate: 1-Chlorooctadecane 93.2 % 52.1-176

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* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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 RICE ENVIRONMENTAL CONSULTING & SAFETY |
 LAURA FLORES
 419 W. CAIN
 HOBBS NM, 88240
 Fax To: (575) 397-1471

 Received: 10/03/2014
 Reported: 10/06/2014
 Project Name: MCA WELL #273
 Project Number: COP
 Project Location: NONE GIVEN

 Sampling Date: 10/02/2014
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: VERTICAL 1 @ 9' (H403026-03)

BTEX 8021B		mg/kg		Analyzed By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/03/2014	ND	1.90	95.2	2.00	2.17	
Toluene*	<0.050	0.050	10/03/2014	ND	1.83	91.4	2.00	0.748	
Ethylbenzene*	<0.050	0.050	10/03/2014	ND	1.71	85.4	2.00	2.04	
Total Xylenes*	<0.150	0.150	10/03/2014	ND	5.04	84.0	6.00	2.57	
Total BTEX	<0.300	0.300	10/03/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 98.3 % 61-154

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	880	16.0	10/03/2014	ND	416	104	400	3.77	

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	10/03/2014	ND	178	89.0	200	1.40	
DRO >C10-C28	<10.0	10.0	10/03/2014	ND	188	93.9	200	0.594	

Surrogate: 1-Chlorooctane 89.0 % 47.2-157

Surrogate: 1-Chlorooctadecane 92.8 % 52.1-176

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* = Accredited Analyte

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

Received:	10/03/2014	Sampling Date:	10/02/2014
Reported:	10/06/2014	Sampling Type:	Soil
Project Name:	MCA WELL #273	Sampling Condition:	Cool & Intact
Project Number:	COP	Sample Received By:	Jodi Henson
Project Location:	NONE GIVEN		

Sample ID: VERTICAL 2 @ SURFACE (H403026-04)

BTEX 8021B		mg/kg		Analyzed By: ms						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	10/03/2014	ND	1.90	95.2	2.00	2.17		
Toluene*	<0.050	0.050	10/03/2014	ND	1.83	91.4	2.00	0.748		
Ethylbenzene*	<0.050	0.050	10/03/2014	ND	1.71	85.4	2.00	2.04		
Total Xylenes*	<0.150	0.150	10/03/2014	ND	5.04	84.0	6.00	2.57		
Total BTEX	<0.300	0.300	10/03/2014	ND						

Surrogate: 4-Bromofluorobenzene (PID) 99.0 % 61-154

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	10/03/2014	ND	416	104	400	3.77		

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	10/03/2014	ND	178	89.0	200	1.40		
DRO >C10-C28	<10.0	10.0	10/03/2014	ND	188	93.9	200	0.594		

Surrogate: 1-Chlorooctane 92.1 % 47.2-157
Surrogate: 1-Chlorooctadecane 95.4 % 52.1-176

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 LAURA FLORES
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 Fax To: (575) 397-1471

Received:	10/03/2014	Sampling Date:	10/02/2014
Reported:	10/06/2014	Sampling Type:	Soil
Project Name:	MCA WELL #273	Sampling Condition:	Cool & Intact
Project Number:	COP	Sample Received By:	Jodi Henson
Project Location:	NONE GIVEN		

Sample ID: VERTICAL 2 @ 1' (H403026-05)

BTEX 8021B		mg/kg		Analyzed By: ms						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	10/03/2014	ND	1.90	95.2	2.00	2.17		
Toluene*	<0.050	0.050	10/03/2014	ND	1.83	91.4	2.00	0.748		
Ethylbenzene*	<0.050	0.050	10/03/2014	ND	1.71	85.4	2.00	2.04		
Total Xylenes*	<0.150	0.150	10/03/2014	ND	5.04	84.0	6.00	2.57		
Total BTEX	<0.300	0.300	10/03/2014	ND						

Surrogate: 4-Bromofluorobenzene (PID) 99.0 % 61-154

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	10/03/2014	ND	416	104	400	3.77		

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	10/03/2014	ND	178	89.0	200	1.40		
DRO >C10-C28	2310	10.0	10/03/2014	ND	188	93.9	200	0.594		

Surrogate: 1-Chlorooctane 88.3 % 47.2-157
Surrogate: 1-Chlorooctadecane 131 % 52.1-176

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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 RICE ENVIRONMENTAL CONSULTING & SAFETY |
 LAURA FLORES
 419 W. CAIN
 HOBBS NM, 88240
 Fax To: (575) 397-1471

Received:	10/03/2014	Sampling Date:	10/02/2014
Reported:	10/06/2014	Sampling Type:	Soil
Project Name:	MCA WELL #273	Sampling Condition:	Cool & Intact
Project Number:	COP	Sample Received By:	Jodi Henson
Project Location:	NONE GIVEN		

Sample ID: VERTICAL 2 @ 2' (H403026-06)

BTEX 8021B		mg/kg		Analyzed By: ms						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	10/03/2014	ND	1.90	95.2	2.00	2.17		
Toluene*	<0.050	0.050	10/03/2014	ND	1.83	91.4	2.00	0.748		
Ethylbenzene*	<0.050	0.050	10/03/2014	ND	1.71	85.4	2.00	2.04		
Total Xylenes*	<0.150	0.150	10/03/2014	ND	5.04	84.0	6.00	2.57		
Total BTEX	<0.300	0.300	10/03/2014	ND						

Surrogate: 4-Bromofluorobenzene (PID) 98.6 % 61-154

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	10/03/2014	ND	416	104	400	3.77		

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	10/03/2014	ND	178	89.0	200	1.40		
DRO >C10-C28	<10.0	10.0	10/03/2014	ND	188	93.9	200	0.594		

Surrogate: 1-Chlorooctane 73.3 % 47.2-157

Surrogate: 1-Chlorooctadecane 77.4 % 52.1-176

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* = Accredited Analyte

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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

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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 MCA Well #273

Unit Letter L, Section 26, T17S, R32E



Initial release area, facing west

9/4/14



Initial release area, facing southwest

9/4/14



Initial release area, facing northeast

9/4/14



Initial release area, facing northwest

9/4/14



Installing vertical 1, facing northeast

10/2/14



Installing vertical 2, facing northeast

10/2/14