



CONOCOPHILLIPS

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

Ruby Federal Battery (1RP-3399)

Corrective Action Plan

API No. 30-025-20792

Release Date: March 10th, 2014

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

January 5th, 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: Corrective Action Plan
ConocoPhillips Ruby Federal Battery (1RP-3399)
UL/L sec. 17 T17S R32E
API No. 30-025-20792**

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 2.5 miles southwest of Maljamar, New Mexico, at UL/L sec. 17 T17S R32E. Given that the release area is located near a region of no known groundwater, a presumption can be made of no groundwater beneath the site (Figure 1).

On March 10th, 2014, CoP discovered that the drain plug from the south water transfer pump had corroded, which resulted in a release of 18.3 barrels of produced water. A total of 5 barrels of this fluid was recovered. The release affected 1,510 square feet of lease pad (Figure 2). NMOCD and BLM were notified of the release on March 12th, 2014, and an initial C-141 was sent to both agencies for approval (Appendix A).

RECS personnel were on site to visually assess the release on September 29th, 2014. The release was mapped and photographed (Appendix B). Based on the assessment, the release will be scraped down 6 inches bgs. Once the scrape is completed, a 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, Gasoline Range Organics (GRO), Diesel Range Organics (DRO) and BTEX readings below regulatory standards, the scrape will be deepened until field testing indicates that all constituents from the bottom composite will return values 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. Clean caliche will be

imported to the site to replace any soils taken to disposal. A sample of the backfill soils will be taken to a commercial laboratory to confirm that chloride, GRO, DRO and BTEX readings are below regulatory standards. The scrape will be backfilled and contoured to the surrounding location.

Once these activities have been completed, a report will be sent to NMOCDC 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,

A handwritten signature in cursive script, appearing to read 'L.W.', followed by a long horizontal flourish.

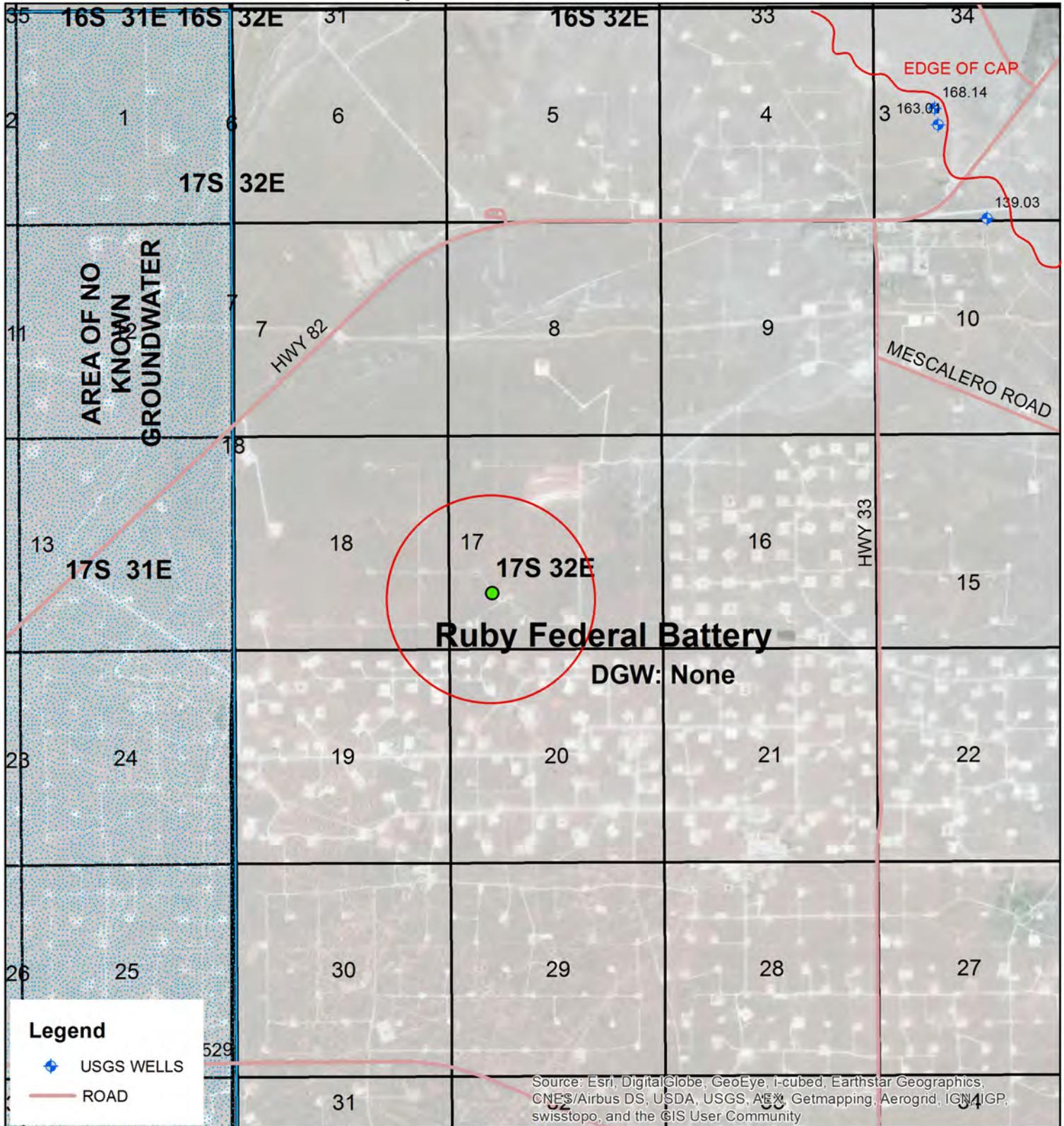
Lara Weinheimer
Project Scientist
RECS
(575) 441-0431

Attachments:

Figure 1 – Site Map
Appendix A – Initial C-141
Appendix B – Photo Documentation

Figures

Depth to Groundwater



Source: Esri, DigitalGlobe, GeoEye, i-cubed, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, IGP, swisstopo, and the GIS User Community

Legend

- ◆ USGS WELLS
- ROAD

RECS
RICE ENVIRONMENTAL
CONSULTING & SAFETY

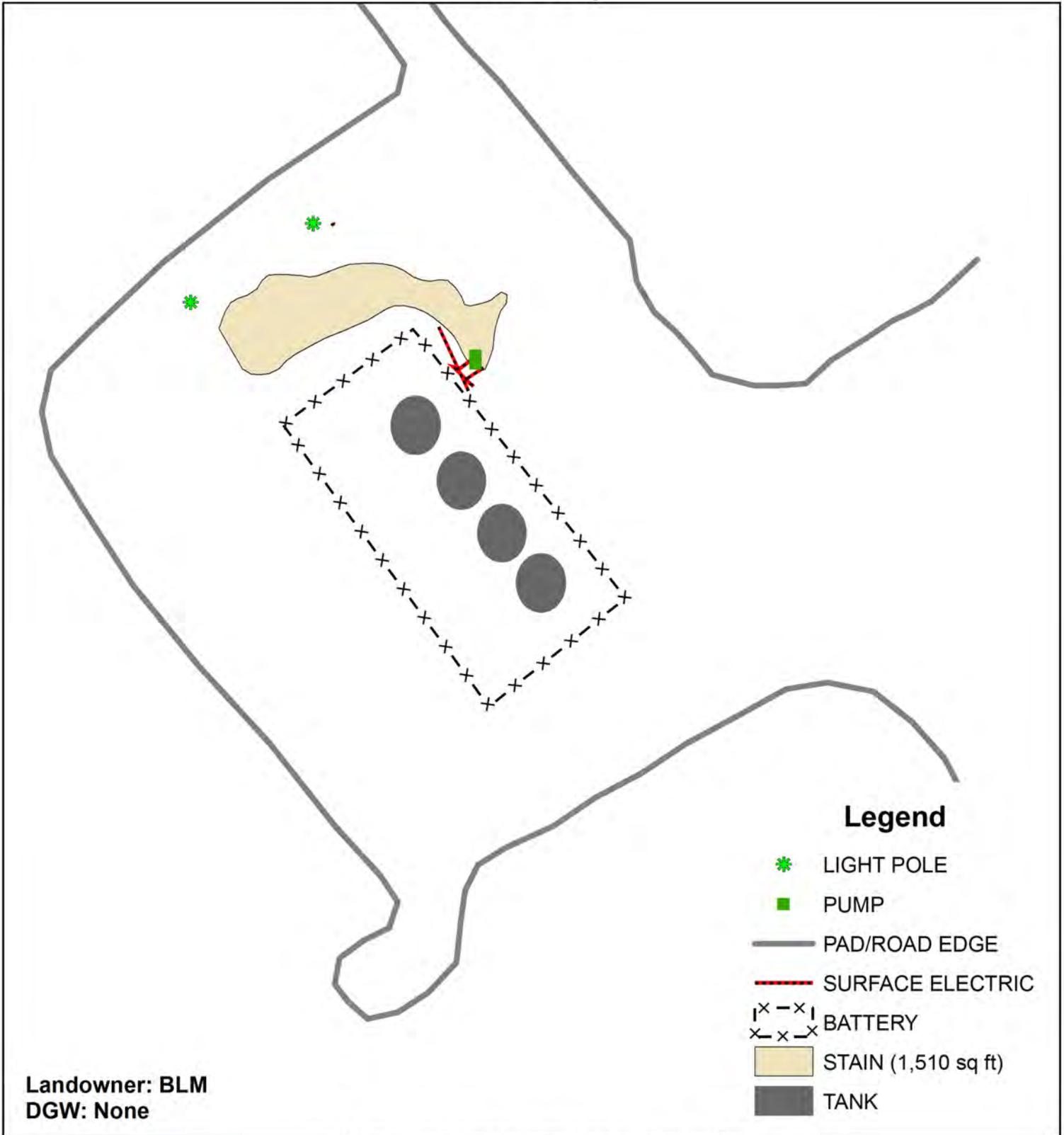
CONOCOPHILLIPS
RUBY FEDERAL
BATTERY
LEGALS: UL/ L sec. 17
T-17-S R-32-E
LEA COUNTY, NM

Figure 1

0 0.4 0.8
Miles

Drawing date: 10/30/14
Drafted by: L. Weinheimer

Site Map



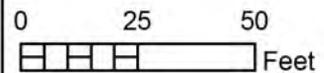
Landowner: BLM
DGW: None



CONOCOPHILLIPS RUBY FEDERAL BATTERY

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

Figure 2



GPS date: 9/29/14 CF
Drawing date: 10/30/14
Drafted by: T. Grieco



Appendix A

Intial C-141

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
700 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

Form C-141
Revised August 3, 2011

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: Spencer Cluff
Address: 29 Vacuum Complex Lane	Telephone No. 575-391-3143
Facility Name: Ruby Federal Battery	Facility Type: Battery

Surface Owner: NMOCD	Mineral Owner NMOCD	API No. 3002520792
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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	17	17S	32E	1750	South	990	West	LEA

Latitude **32.8321781006055** Longitude - **103.794020703151**

NATURE OF RELEASE

Type of Release: Spill	Volume of Release: 18.3 BBLs	Volume Recovered: 5 BBLs
Source of Release: water transfer pump	Date and Hour of Occurrence 03/10/14 7:30 am	Date and Hour of Discovery SAME
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Solomon Hughes/Geoffrey Leking	
By Whom? David May	Date and Hour: 03/12/2014 8:30 am	
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.*

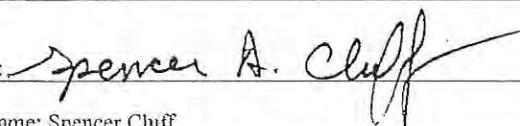
Describe Cause of Problem and Remedial Action Taken.* A corroded drain plug came out of the south water transfer pump resulting in a release. The MSO inserted a new plug and ordered stainless steel plugs for the pump.

Describe Area Affected and Cleanup Action Taken.*

The affected caliche pad area was 80 ft. X 19 ft. and will be remediated according to 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.

OIL CONSERVATION DIVISION

Signature: 	Approved by Environmental Specialist:	
Printed Name: Spencer Cluff	Approval Date:	Expiration Date:
Title: HSE Lead	Conditions of Approval:	
E-mail Address: spencer.a.cluff@conocophillips.com	Attached <input type="checkbox"/>	
Date: 03/11/2014	Phone: 575-391-3143	

* Attach Additional Sheets If Necessary

Appendix B

Photo Documentation

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

ConocoPhillips Ruby Federal Battery

Unit Letter L, Section 17, T17S, R32E



Initial site photo, facing southwest

9/29/14



Initial site photo, facing southwest

9/29/14



Initial site photo, facing southwest

9/29/14