RECEIVED
By JKeyes at 10:51 am, Oct 08, 2015

APPROVED
By JKeyes at 10:51 am, Oct 08, 2015

ConocoPhillips

CONOCOPHILLIPS

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

SEMU 95 SWD

(1RP-3485)

Corrective Action Plan

API No. 30-025-06239

Release Date: December 31st, 2014

Unit Letter J, Section 23, Township 20S, Range 37E

PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

October XX, 2015

Kellie Jones
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 SEMU 95 SWD (1RP-3485)
UL/J sec. 23 T20S R37E
API No. 30-025-06239

Ms. Jones:

ConocoPhillips (CoP) has retained Basin Environmental Service Technologies to address potential environmental concerns at the above-referenced site.

Background and Previous Work

The site is located approximately 5.3 miles southwest of Monument, New Mexico at UL/J sec. 23 T20S R37E. NM OSE and BLM installed monitor well records indicate that groundwater will likely be encountered at a depth of approximately 54 +/- feet.

On December 31st, 2014, CoP discovered that a skim tank had overflowed when a u-tube and a surge valve froze. This caused the surge tank to fill and send fluid to the skim tank, which overflowed. A total of 15.67 barrels of oil and produced water were released over 8,700 sq ft of lease pad. None of this fluid was recovered. The wells to the SWD were shut in, and the inlet valve was closed. BLM and NMOCD were notified of the release on December 31st, 2014, and an initial C-141 was submitted to both parties. NMOCD approved of the initial C-141 on January 7th, 2015 (Appendix A).

Basin personnel were on site to assess the release January 5th, 2015. The release was mapped and photographed and CoP scraped the release area to 6 inches bgs (Appendix B). On August 18th, 2015, three samples were collected at 6 inches bgs and sent to a commercial laboratory for analysis. Laboratory analysis of Point 1 returned a chloride value of non-detect, a Gasoline Range Organics (GRO) value of 15.7 mg/kg, a Diesel Range Organics (DRO) value of 244 mg/kg and BTEX values of non-detect except for Total Xylenes, which returned a value of 0.254 mg/kg. Laboratory analysis of Point 2 returned a chloride value of non-detect, a GRO value of 20.1 mg/kg, a DRO value of 439 mg/kg and BTEX values of non-detect except for Ethylbenzene which returned a value of 0.05 mg/kg and a Total Xylenes value of 0.217 mg/kg. Laboratory

analysis of Point 3 returned a chloride value of 64 mg/kg, a GRO value of 252 mg/kg (Appendix C).

Based on the assessment, the release area around Point 3 will be scraped down to 1 ft bgs. Once the scrape is completed, discreet samples from the bottom of the scrape will be taken and field tested for chlorides and organic vapors. If the field data indicates that the discreet bottom samples will not achieve chloride, Gasoline Range Organics (GRO) and Diesel Range Organics (DRO) below regulatory standards, the scrape will be deepened until field testing indicates that all constituents from the discreet bottom samples will return values below regulatory standards. The discreet bottom samples will then be taken to a commercial laboratory to confirm that chloride, GRO and DRO values are below regulatory standards.

All excavated soils will be taken to a NMOCD approved facility for disposal. Clean caliche will be imported to the site to serve as backfill. A sample of the imported caliche will be taken to a commercial laboratory to confirm that the chloride reading is below regulatory standards. The scrape will be backfilled with clean, imported caliche and contoured to the surrounding location.

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

Basin appreciates the opportunity to work with you on this project. Please contact me if you have any questions or wish to discuss the site.

Sincerely,

Kyle Norman

Kyle Norman
Project Lead
Basin Environmental Service Technologies
(575) 942-8542

Attachments:

- Figure 1 – Proposed Scrape
- Appendix A – Initial C-141
- Appendix B – Photo Documentation
- Appendix C – Laboratory Analysis

Figures

Basin Environmental Service Technologies
P.O. Box 2948, Hobbs, NM 88241
Phone 575.393.2967

Proposed Scrape

Point 1

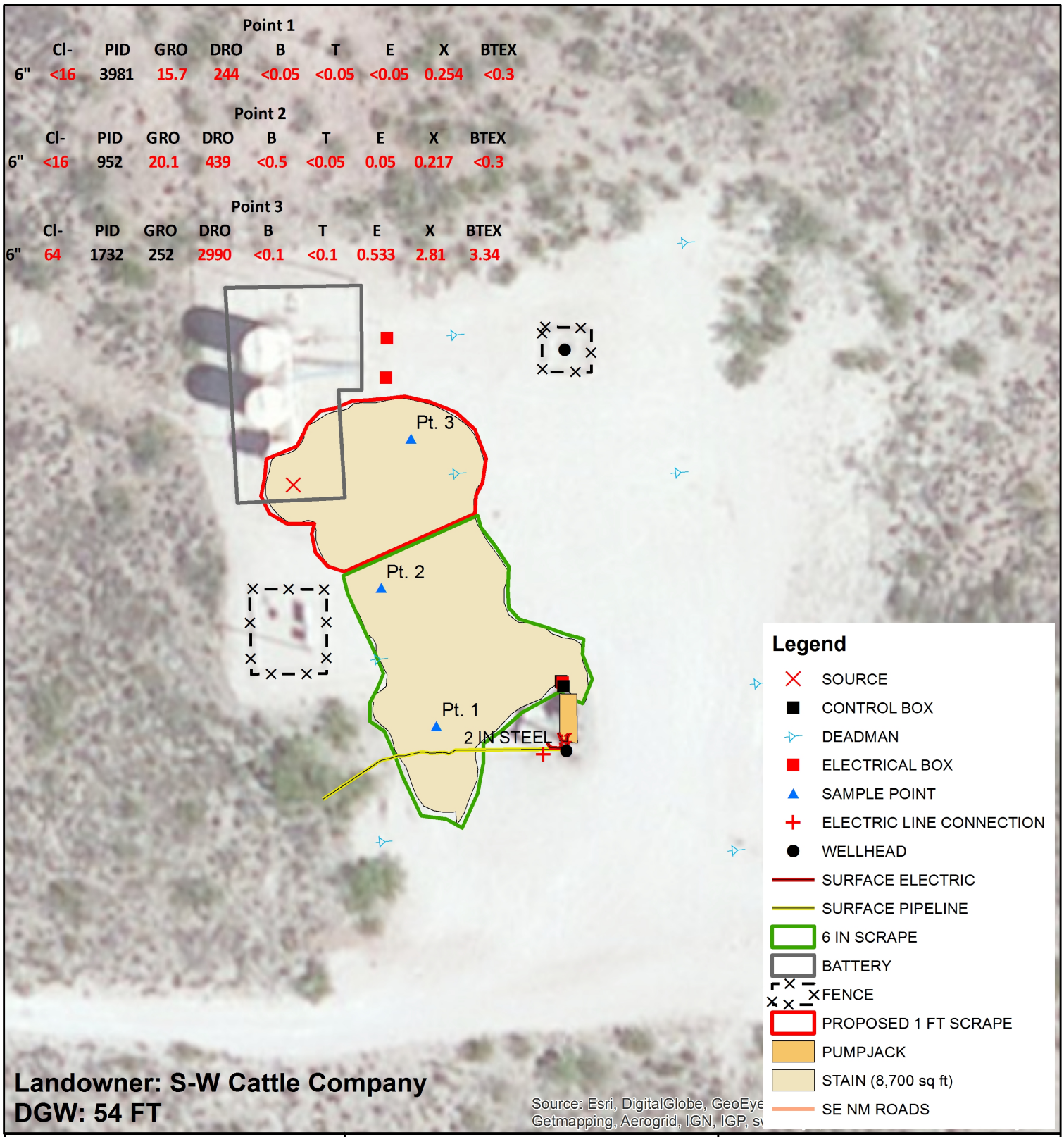
	Cl-	PID	GRO	DRO	B	T	E	X	BTEX
6"	<16	3981	15.7	244	<0.05	<0.05	<0.05	0.254	<0.3

Point 2

	Cl-	PID	GRO	DRO	B	T	E	X	BTEX
6"	<16	952	20.1	439	<0.5	<0.05	0.05	0.217	<0.3

Point 3

	Cl-	PID	GRO	DRO	B	T	E	X	BTEX
6"	64	1732	252	2990	<0.1	<0.1	0.533	2.81	3.34



Landowner: S-W Cattle Company
DGW: 54 FT

Basin Environmental Service Technologies
Effective Solutions

CONOCOPHILLIPS
SEMU 95 SWD

LEGALS: UL/ J SEC. 23
T-20-S R-37-E
LEA COUNTY, NM
NMOCD CASE # 1RP-3485

Figure 1

0 30 60 Feet

N W E S

Drawing date: 1/6/15
Drafted by: L. Weinheimer

Appendix A
Intial C-141

Basin Environmental Service Technologies
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

HOBBS OCD
JAN 07 2015

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

Form C-141
Revised August 8, 2011

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

Release Notification and Corrective Action

RECEIVED

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: **ConocoPhillips**	Contact: **Spencer Cluff**
Address: **1410 N West Country Road**	Telephone No. **575-746-7248**
Facility Name: **SEMU 95 SWD**	Facility Type: **Battery**

Surface Owner: NMOCD	Mineral Owner: BLM	API No. 30-025-06239

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
J	23	20S	37E	1980	South	1980	East	**LEA**

Latitude 32.5567134268039,- **Longitude** 103.220020515971

NATURE OF RELEASE

Type of Release: **Spill**	Volume of Release: 15.67 BBLS	Volume Recovered: 0 BBLS
Source of Release: Flow Line	Date and Hour of Occurrence 12/31/2014 4:20 am	Date and Hour of Discovery 3112/2/2014 5:00 am
Was Immediate Notice Given? ☒ Yes ☒ No ☐ Not Required	If YES, To Whom? **Tomas Oberding** **Solomon Hughes**	
By Whom? **Spencer Cluff**	Date and Hour: **12/31/2014 12:00 am**	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

On Wednesday, December 31, 2014 at 0420 hrs. MST, an agency reportable spill occurred at the SEMU 95 SWD when the skim over flowed. MSO received a high level alarm at 0400 hrs. MST and then a high high level alarm at 0420 hrs. MST. MSO responded to high level alarm by going out to location. MSO shut down the wells to the SEMU 95 SWD and closed the inlet valve to stop the leak. Upon further inspection, MSO noticed that the u-tube was frozen and caused the surge tank to fill and send fluid to the skim tank. MSO also noticed that the surge valve was frozen open causing the actuator to stay open and fill the surge tank.

Describe Area Affected and Cleanup Action Taken.*

The spill area was 150 ft X 225 ft. X 0.5 deep and resulted in 3 BO and 12.67 BPW for a total of 15.67 bbls of total fluid, with none recovered. This is a PSE Tier 2. The spill 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: *Spencer A. Cluff*	OIL CONSERVATION DIVISION Approved by Environmental Specialist:	
Printed Name: Spencer A. Cluff		
Title: LEAD HSE	Approval Date: 1-7-15	Expiration Date: 3-7-15

JAN 08 2015

E-mail Address: **spencer.a.cluff@conocophillips.com**	Conditions of Approval: Site Sample required. Delineate & remediate area as per NMOCD guide. Submit final C-141 by 3-7-15	Attached ☐
Date: 12/31/2014 Phone:575-746-7248		1RP 3485

* Attach Additional Sheets If Necessary

21781 7

nTO1500738356

pTO1500738845

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Appendix B
Photo Documentation

Basin Environmental Service Technologies
P.O. Box 2948 Hobbs, NM 88241
Phone 575.393.2967

ConocoPhillips SEMU 95 SWD

Unit Letter J, Section 23, T20S, R37E

Initial release area, facing north 1/5/15

Initial release area, facing northwest 1/5/15

Initial release area, facing south 1/5/15

Appendix C
Laboratory Analysis

Basin Environmental Service Technologies
P.O. Box 2948 Hobbs, NM 88241
Phone 575.393.2967

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

August 27, 2015

KYLE NORMAN

BASIN ENVIRONMENTAL - HOBBS

419 W. CAIN

HOBBS, NM 88240

RE: SEMU 95 SWD

Enclosed are the results of analyses for samples received by the laboratory on 08/21/15 10:03.

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 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.

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

Celey D. Keene

Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

BASIN ENVIRONMENTAL - HOBBS
KYLE NORMAN
419 W. CAIN
HOBBS NM, 88240
Fax To: (575) 393-0293

Received:	08/21/2015	Sampling Date:	08/18/2015
Reported:	08/27/2015	Sampling Type:	Soil
Project Name:	SEMU 95 SWD	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Judy Garcia
Project Location:	NOT GIVEN		

Sample ID: POINT 1 @ 6" (H502211-01)

BTEX 8021B mg/kg Analyzed By: CK

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/25/2015	ND	2.04	102	2.00	1.23	
Toluene*	<0.050	0.050	08/25/2015	ND	1.92	96.0	2.00	0.582	
Ethylbenzene*	<0.050	0.050	08/25/2015	ND	2.02	101	2.00	0.721	
Total Xylenes*	**0.254**	0.150	08/25/2015	ND	5.80	96.6	6.00	0.437	
Total BTEX	<0.300	0.300	08/25/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID *104 %* *85.6-137*

Chloride, SM4500Cl-B mg/kg Analyzed By: HM

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	08/24/2015	ND	416	104	400	0.00	

TPH 8015M mg/kg Analyzed By: CK

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	**15.7**	10.0	08/24/2015	ND	191	95.4	200	0.499	
DRO >C10-C28	**244**	10.0	08/24/2015	ND	196	98.0	200	3.17	

Surrogate: 1-Chlorooctane *85.9 %* *47.2-157*

Surrogate: 1-Chlorooctadecane *91.4 %* *52.1-176*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

BASIN ENVIRONMENTAL - HOBBS
KYLE NORMAN
419 W. CAIN
HOBBS NM, 88240
Fax To: (575) 393-0293

Received:	08/21/2015	Sampling Date:	08/18/2015
Reported:	08/27/2015	Sampling Type:	Soil
Project Name:	SEMU 95 SWD	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Judy Garcia
Project Location:	NOT GIVEN		

Sample ID: POINT 2 @ 6" (H502211-02)

BTEX 8021B mg/kg Analyzed By: CK

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/25/2015	ND	2.04	102	2.00	1.23	
Toluene*	<0.050	0.050	08/25/2015	ND	1.92	96.0	2.00	0.582	
Ethylbenzene*	**0.050**	0.050	08/25/2015	ND	2.02	101	2.00	0.721	
Total Xylenes*	**0.217**	0.150	08/25/2015	ND	5.80	96.6	6.00	0.437	
Total BTEX	<0.300	0.300	08/25/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID *104 %* *85.6-137*

Chloride, SM4500Cl-B mg/kg Analyzed By: HM

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	08/24/2015	ND	416	104	400	0.00	

TPH 8015M mg/kg Analyzed By: CK

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	**20.1**	10.0	08/24/2015	ND	190	95.0	200	1.05	
DRO >C10-C28	**439**	10.0	08/24/2015	ND	198	98.8	200	1.17	

Surrogate: 1-Chlorooctane *89.9 %* *47.2-157*

Surrogate: 1-Chlorooctadecane *90.4 %* *52.1-176*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

BASIN ENVIRONMENTAL - HOBBS
KYLE NORMAN
419 W. CAIN
HOBBS NM, 88240
Fax To: (575) 393-0293

Received:	08/21/2015	Sampling Date:	08/18/2015
Reported:	08/27/2015	Sampling Type:	Soil
Project Name:	SEMU 95 SWD	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Judy Garcia
Project Location:	NOT GIVEN		

Sample ID: POINT 3 @ 6" (H502211-03)

BTEX 8021B mg/kg Analyzed By: CK

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.100	0.100	08/25/2015	ND	2.04	102	2.00	1.23	
Toluene*	<0.100	0.100	08/25/2015	ND	1.92	96.0	2.00	0.582	
Ethylbenzene*	**0.533**	0.100	08/25/2015	ND	2.02	101	2.00	0.721	
Total Xylenes*	**2.81**	0.300	08/25/2015	ND	5.80	96.6	6.00	0.437	
Total BTEX	**3.34**	0.600	08/25/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID *98.5 %* *85.6-137*

Chloride, SM4500Cl-B mg/kg Analyzed By: HM

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**64.0**	16.0	08/24/2015	ND	416	104	400	0.00	

TPH 8015M mg/kg Analyzed By: CK

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	**252**	50.0	08/24/2015	ND	190	95.0	200	1.05	
DRO >C10-C28	**2990**	50.0	08/24/2015	ND	198	98.8	200	1.17	

Surrogate: 1-Chlorooctane *124 %* *47.2-157*

Surrogate: 1-Chlorooctadecane *102 %* *52.1-176*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

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

Celey D. Keene, Lab Director/Quality Manager

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

CARDINAL LABORATORIES
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

Company Name: ConocoPhillips	**BILL TO**
Project Manager: Kyle Norman	**P.O. #:**
Address: 419 W Cain	**Company:** Basin
City: Hobbs **State:** NM **Zip:** 88240	**Attn:**
Phone #: 575-393-2967 **Fax #:** 575-393-0293	**Address:** 419 W Cain
Project #: **Project Owner:**	**City:** Hobbs
Project Name:	**State:** NM **Zip:** 88240
Project Location: SEMU 95 Sand	**Phone #:** 575-393-2967
Sampler Name: J Kamplain	**Fax #:** 575-393-0293

FOR LAB USE ONLY				MATRIX						PRESERV.			SAMPLING		ANALYSIS REQUEST										
Lab I.D.	**Sample I.D.**	(G)RAB OR (C)OMP.	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:	ICE / COOL	OTHER :	DATE	TIME	Chlorides	TPH 8015 M	BTEX	Texas TPH	Complete Cations/Anions	TDS					
H502241																								
1	PH1 @ 6"	G	1			✓					✓		8/18/5	3:00	✓	✓	✓								
2	PH2 @ 6"	G	1			✓					✓		"	3:10	✓	✓	✓								
3	PH3 @ 6"	G	1			✓					✓		"	3:20	✓	✓	✓								

Relinquished By:	**Date:**	**Received By:**	
	Time:		
Relinquished By:	**Date:** 8-21-05	**Received By:** Judy Garcia	
	Time: 10:03		
Delivered By: (Circle One)		**Sample Condition** Cool ☑ Yes ☐ No Intact ☑ Yes ☐ No	**CHECKED BY: (Initials)** JG
Sampler - UPS - Bus - Other:	-5.6°C		

Phone Result: ☐ Yes ☑ No **Add'l Phone #:**
Fax Result: ☐ Yes ☑ No **Add'l Fax #:**
REMARKS:
email results:
hconder@basinenv.com; knorman@basinenv.com;
jkamplain@basinenv; lflores@basinenv; lweinheimer@basinenv;
cursanic@basinenv; sedwards@basinenv
environmental tech: @basinenv

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

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