

RECEIVED By JKeyes at 1:24 pm, Jan 26, 2016

APPROVED By JKeyes at 1:24 pm, Jan 26, 2016

CONOCOPHILLIPS

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

Ruby Federal Battery (1RP-3399)

Termination Request

API No. 3002520792

Release Date: March 10th, 2014

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



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

January 26th, 2016

Kellie Jones Environmental Specialist – New Mexico Oil Conservation Division Energy, Minerals and Natural Resources Department 1625 N. French Dr. Hobbs, NM 88240

> RE: Termination Request ConocoPhillips Ruby Federal Battery (1RP-3399) UL/L sec. 17 T17S R32E API No. 30-025-20792

Ms. Jones:

ConocoPhillips (CoP) has retained Basin Environmental Service Technologies, LLC (Basin) 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.

On March 10th, 2014, CoP discovered that the drain plug from the south water transfer pump had corroded, resulting in a release of 18.3 barrels of produced water over 1,510 square feet of lease pad. A total of 5 barrels of this fluid was recovered. NMOCD and BLM were notified of the release on March 12th, 2014, and an initial C-141 was submitted to both agencies for approval. NMOCD approved the initial C-141 on October 30, 2014. (Appendix A).

Basin personnel were on site to visually assess the release September 29th, 2014. The release was mapped and photographed. Based on the assessment, a Corrective Action Plan (CAP) was submitted to NMOCD and BLM on January 5th, 2015. Both agencies approved the plan January 7th, 2015. The CAP stated that the release would be scraped down 6 inches bgs. Once the scrape was completed, a composite sample from the bottom of the scrape would be taken and field tested for chlorides and organic vapors. If the field data indicated that the composite would not achieve chloride, Gasoline Range Organics (GRO), Diesel Range Organics (DRO) and BTEX readings below regulatory standards, the scrape would be deepened until field testing indicated that all constituents from the

bottom composite would return values below regulatory standards. The bottom composite would then be taken to a commercial laboratory to confirm that chloride, GRO, DRO and BTEX readings were below regulatory standards.

All excavated soils would be evaluated for use as backfill and any soils that did not meet regulatory standards would be taken to a NMOCD approved facility for disposal. Clean caliche would be imported to the site to replace any soils taken for disposal. A sample of the backfill soils would be taken to a commercial laboratory to confirm that chloride, GRO, DRO and BTEX readings were below regulatory standards. The scrape would be backfilled and contoured to the surrounding location.

Corrective actions began at the site February 18th, 2015. The release area, as stated in the CAP, was scraped down 6 inches (Figure 1). A 5 point bottom composite was taken from the base of the scrape. The composite was field tested for chlorides and organic vapors and then taken to a commercial laboratory for analyses (Appendix B). The composite returned a laboratory chloride reading of160 mg/kg. Gasoline Range Organics (GRO), Diesel Range Organics (DRO) and BTEX returned readings of non-detect.

On February 19th, 2015, a request to backfill the site was sent to NMOCD and BLM. NMOCD approved the site to be backfilled February 20th, 2015, and BLM approved the site to be backfilled February 24th, 2015. All excavated soil, a total of 30 cubic yards, was taken to NMOCD approved facility for disposal. A total of 30 cubic yards of top soil was imported to the site to serve as backfill. A 5 point composite of the imported soil was taken to a commercial laboratory for analysis and returned a chloride value 32 mg/kg. The site was backfilled with the imported top soil and contoured to the surrounding location. Photo documentation of the field activities can be found in Appendix C.

Given that CoP has completed the actions as stated in the approved CAP, CoP respectfully requests 'remediation termination' and site closure. The final C-141 can be found in Appendix D.

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

Sincerely,

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

Attachments: Figure 1 – Excavation Data Appendix A – Initial C-141 Appendix B – Laboratory Analysis Appendix C – Photo Documentation Appendix D – Final C-141

Figures

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

Excavation Data



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 1920 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: 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 LOCATION OF RELEASE Unit Letter Feet from the North/South Line Feet from the East/West Line County Section Township Range-17 17S 32E South 990 1750 West LEA Latitude 32.8321781006055 Longitude - 103.794020703151 NATURE OF RELEASE Volume of Release: 18.3 BBLS Volume Recovered: 5 BBLS Type of Release: Spill Source of Release: water transfer pump Date and Hour of Occurrence Date and Hour of Discovery 03/10/14 7:30 am SAME IF YES; To Whom? Was Immediate Notice Given? 🗌 Yes 🖾 No 🗌 Not Required Solomon Hughes/Geoffrey Leking Date and Hour: 03/12/2014 8:30 ani By Whom? David May If YES, Voluine Impacting the Watercourse. Was a Watercourse Reached? 🗌 Yes 🖾 No 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: Appraved by Environmental Specialist: Printed Name: Spencer Chiff Expiration Date: 12-3.0-14 Title: HSE Lead Approval Date: 10-30-119 Conditions of Approval: E-mail Address: spencer.a.cluff@conocophillips.com Site Suplar normal Attached Aslante & - molate area super NMOCO guides. Subici Ful C-141 by IRP - 3399 Date: 03/11/2014 Phone:575-391-3143 * Attach Additional Sheets If Necessary ogred 217817 NTO1430349896 12-30-14

OCT 3 0 2014

⁰⁷⁰¹⁴³⁰³⁵⁰⁰³⁷

Appendix B Laboratory Analysis

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



February 19, 2015

KYLE NORMAN RICE ENVIRONMENTAL CONSULTING & SAFETY LLC 419 W. CAIN HOBBS, NM 88240

RE: RUBY FEDERAL BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 02/18/15 14:35.

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/ga/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. Keine

Celey D. Keene Lab Director/Quality Manager



Analytical Results For:

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

Received:	02/18/2015	Sampling Date:	02/18/2015
Reported:	02/19/2015	Sampling Type:	Soil
Project Name:	RUBY FEDERAL BATTERY	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NONE GIVEN		

Sample ID: 5 PT COMP 6" SCRAPE BOTTOM (H500474-01)

BTEX 8021B	mg/	kg	Analyze	d By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/19/2015	ND	1.59	79.5	2.00	13.7	
Toluene*	<0.050	0.050	02/19/2015	ND	1.55	77.4	2.00	13.0	
Ethylbenzene*	<0.050	0.050	02/19/2015	ND	1.48	74.1	2.00	12.6	
Total Xylenes*	<0.150	0.150	02/19/2015	ND	4.32	72.0	6.00	12.8	
Total BTEX	<0.300	0.300	02/19/2015	ND					
Surrogate: 4-Bromofluorobenzene (PID	74.8 9	% 61-154							
Chloride, SM4500Cl-B	mg/	kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	160	16.0	02/19/2015	ND	416	104	400	3.77	
					110	101	100	5.77	
TPH 8015M	mg/			d By: MS	110	101	100	5.77	
TPH 8015M Analyte	mg/ Result			d By: MS Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Analyte GRO C6-C10		kg	Analyze	•					Qualifier
Analyte	Result	kg Reporting Limit	Analyze Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Analyte GRO C6-C10	Result	kg Reporting Limit 10.0 10.0	Analyzed 02/18/2015 02/18/2015	Method Blank	BS 203	% Recovery	True Value QC 200	RPD 3.02	Qualifier

Cardinal Laboratories

*=Accredited Analyte

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



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

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



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RUSH XXX

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name	ALUS									B	ILL	TO						AN	ALY	SIS F	REOL	EST			_
Project Manage	er: Laura Flores, Kyle	N	an	19	1			P.C). #:					T		Т	T	Ť	T				-	1	-
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City:	State: Zip:						Attn:			1									1						
Phone #:	Fax #:							Add	dres	s:				1								1			
Project #:	Project Own	ner:						City	y:					1									1		
Project Name:	1							Sta	te:		Zip:			1											
Project Locatio	n: Ruby Federal Batt. Kyle Schnaidt	14						Pho	one	#:															
Sampler Name:	Kyle Schnaidt	~	_					Fax	:#:					1											
FOR LAB USE ONLY					MA	TRE	X		PRE	SERV	. S	AMPL	ING	1											
Lab I.D. 1500474	Sample I.D.	(G)RAB OR (C)OMP	# CONTAINERS	ROUNDWATER	WASTEWATER Soll	1L	SLUDGE	OTHER :	ACID/BASE:	OTHER :		ATE	TIME	-12	HOT	RTEV	V J								
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February 23, 2015

KYLE NORMAN RICE ENVIRONMENTAL CONSULTING & SAFETY LLC 419 W. CAIN HOBBS, NM 88240

RE: RUBY FEDERAL BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 02/20/15 14:30.

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

Received:	02/20/2015	Sampling Date:	02/20/2015
Reported:	02/23/2015	Sampling Type:	Soil
Project Name:	RUBY FEDERAL BATTERY	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NONE GIVEN		

Sample ID: 5 PT COMP IMPORTED CALICHE (H500506-01)

Chloride, SM4500Cl-B mg/kg		/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	02/23/2015	ND	416	104	400	3.92	

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Celeg D. Keine

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- *** 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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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page 4 of 4

ARDINAL LABORATORIES 101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603

Company Name: KECS BILL FO ANALYSIS REQUEST Project Manager: Laura Flores Kyle Norman P.O. #: Nanary Address: Company: Company: State: Nanary Nanary City: Hobbs State: NM Zip: 88240 Attn: Nanary Nanary Phone #: Fax #: Address: City: State: Zip: State: State	
Laura riores Ryre Norman	
Address: Company: City: Hobbs State: NM Zip: 88240 Attn: Phone #: Fax #: Address: Project #: Project Owner: City: Project Name: State: 0.110	
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Project Location: Kuby Federal Bettery Phone #: ID ID ID ID Sampler Name: Kyle Schnaidt Fax #: ID ID <td></td>	
FOR LAB USE ONLY	
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PLEASE NOTE: Liability and Demages. 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 the client for the analyses. All claims including those for negligence and any other cause whetsoever shall be deemed weived unless made in writing and received by Cardinal within 30 days alter completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including withiosin, business interruptions, loss of profils incurred by Client, its subsidiarities, affiliates or successors arising out of or related to the performance of services here nucled as by Client, the sub-client or or otherwise.	24
Relinquished By: Date: Phone Result: Yes No Add'l Phone #: Understand Time: 30 Add'l Monthly House Fax Result: Yes No Add'l Fax #:	
Relinquished By: Date: Received By: email: hconder@riceswd.com; lflores@rice-ecs.com	
Time: Iveinheimer@rice-ecs.com; knorman@rice-ecs.com	1
Delivered By: (Circle One) Sample Condition CHECKED BY: jkamplain@rice-ecs.com; sedwards@rice-ecs.com; Sampler - UPS - Bus - Other: 2.4°C Sample Condition CHECKED BY: jkamplain@rice-ecs.com; sedwards@rice-ecs.com; Sampler - UPS - Bus - Other: 2.4°C Sample Condition CHECKED BY: jkamplain@rice-ecs.com; Sampler - UPS - Bus - Other: 2.4°C Sample Condition CHECKED BY: cursanic@rice-ecs.com;	ecs.com

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

Appendix C Photo Documentation

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

ConocoPhillips Ruby Federal Battery Unit Letter L, Section 17, T17S, R32E



Initial release area, facing southwest

9/29/14



Scraping release, facing northwest



Initial release area, facing northeast

9/29/14



Scraping release, facing east

2/18/15



Exporting soil, facing south

2/18/15



Backfilling scrape, facing east

2/20/15



Importing soil, facing east

2/20/15



Backfilling scrape, facing southeast

2/20/15



Completed site, facing southeast

3/25/15



Completed site, facing southwest

3/25/15

Appendix D Final C-141

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

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.

API No. 3002520792

1RP 3399

Release Notification and Corrective Action	,
OPERATOR	Ini

	OPERATOR	Initial Report	🛛 Final Report
Name of Company ConocoPhillips	Contact		
Address 29 Vacuum Complex Lane	Telephone No.		
Facility Name Ruby Federal Battery	Facility Type Battery		

Surface Owner NMOCD

LOCATION OF RELEASE

Mineral Owner NMOCD

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County	1
				1750	South	990	West		ŀ
L	17	175	32E				1	Lea	l

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?	If YES, To Whom?	
🗌 Yes 🛛 No 🗌 Not Required	Solomon Hughes/Geoffrey Leking	
By Whom? David May	Date and Hour 03/12/14 8:30 am	
Was a Watercourse Reached?	If YES, Volume Impacting the Wat	ercourse.
🗌 Yes 🛛 No		
If a Watercourse was Impacted, Describe Fully.*		· ·
Describe Cause of Problem and Remedial Action Taken.*DOn 02/09/14		
MSO received a call that he had a leak at the BMT Battery. COPC MSO		
the circulation line. The leak appeared to be due to internal corrosion. Co	OPC MSO shut in line. Spill site are v	vas 10' wide by 170' long and 2" deep and
3bbls were recovered.		• , 1 • ,
Describe Area Affected and Cleanup Action Taken.*□ The release area	was scraped down 6 inches. A 5	point bottom composite was taken
from the base of the scrape. The composites were field tested for		
for analyses. The composite returned a laboratory chloride reading.		
(DRO) and BTEX readings returned readings of non-detect. On F BLM. NMOCD approved the site to be backfilled on February 20		
2015. All excavated soil, a total of 30 cubic yards, was taken to N		
soil was imported to the site to serve as backfill. A 5 point compo		
analysis and returned a chloride value 32 mg/kg. The site was bac		
location.	kined with the imported top son a	and contoured to the surrounding
I hereby certify that the information given above is true and complete to the	he hast of my knowledge and understo	nd that murayant to NMOCD myles and
regulations all operators are required to report and/or file certain release n		
public health or the environment. The acceptance of a C-141 report by the		
should their operations have failed to adequately investigate and remediat		
or the environment. In addition, NMOCD acceptance of a C-141 report d	oes not relieve the operator of respons	ibility for compliance with any other
federal, state, or local laws and/or regulations.		
	OIL CONSERV	ATION DIVISION
Signature: Sun Them		
Signature: 0		Jan Huye
Printed Name: scan, t. robinson @ app. Com Title: OICLATIONS Spectroper E-mail Address: scan, t. robinson @ Cop. Com	Approved by Environmental Specialis	t: / · · · ·
0	01/26/2016	///
Title: UPERATIONS SPELOGER	Approval Date:	Expiration Date: ///
EmpileAddress for A Alice A A.	Conditions of American	
E-man Address: 5ean, 1, 10mn Jon & Cop, Com	Conditions of Approval:	Attached

///

Phone: 5-15-391-5147

Date: 1-7-14

* Attach Additional Sheets If Necessary