

RECEIVED By JKeyes at 7:53 am, Jan 27, 2016

APPROVED By JKeyes at 7:54 am, Jan 27, 2016

CONOCOPHILLIPS

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

VGEU Well 034 (1RP-3438)

Termination Request

API No. 30-025-02881

Release Date: July 6th, 2014

Unit Letter G, Section 26, Township 17S, Range 35E



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

January 27th, 2016

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

> RE: Termination Request ConocoPhillips VGEU Well 034 (1RP-3438) UL/G sec. 26 T17S R35E API No. 30-025-02881

Mr. Keyes:

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

Background and Previous Work

The site is located approximately 4.6 miles east of Buckeye, New Mexico at UL/G sec. 26 T17S R35E. USGS well records indicate that groundwater will likely be encountered at a depth of approximately 52 +/- feet.

On July 6th, 2014, CoP discovered that the well's stuffing box was leaking. The well was shut in, and the packing for the stuffing box was replaced. A total of 11.75 barrels of primarily produced water was released over 2,040 square feet of lease pad. Ten barrels of the released fluid was recovered. NMOCD was notified of the release on July 8th, 2014, and an initial C-141 was sent to NMOCD for their approval (Appendix A), and approved December 8th, 2014.

Basin personnel were on site beginning on November 18th, 2014. The release was GPS mapped, and two points within the release area were sampled at the surface. Samples with depth were not taken given how indurate the soil is at the site. The samples were field tested for chlorides and organic vapors and then taken to a commercial laboratory for analysis. Both surface samples returned elevated laboratory chloride readings and Gasoline Range Organics (GRO) and Diesel Range Organics (DRO) readings of non-detect, except for the DRO reading at Point 2, which returned a value of 70.2 mg/kg.

Based on the laboratory analysis of the release, a Corrective Action Plan (CAP) was submitted to NMOCD January 5th, 2015. NMOCD approved the CAP January 7th, 2015. The CAP stated that

the release would be scraped down 6 inches. 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, GRO and DRO 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 and DRO readings were below regulatory standards.

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

CAP activities began June 23rd, 2015. The release area was excavated to 2.5 ft and a 5 point bottom composite sample was collected from the base of the excavation and sent to a commercial laboratory for analysis (Figure 1). Laboratory analysis returned a chloride value of 240 mg/kg and GRO and DRO values of non-detect (Appendix B). A total of 140 yards of contaminated soil were exported and disposed of at a NMOCD approved facility. A total of 230 yards of caliche imported for backfill. A total of two samples of the imported soil were taken and sent to a commercial laboratory for analysis. Laboratory analysis of Point 1 returned a chloride level of 208 mg/kg with GRO and DRO values of non-detect. Laboratory analysis of Point 2 returned chloride, GRO and DRO values of non-detect. The site was backfilled with the clean, imported caliche and contoured to the surrounding location.

Photo documentation of the backfilled site can be found in Appendix C.

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

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,

hyle Norma

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

Attachments:

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

Figures

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

Excavation Data



Appendix A Intial C-141

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

HOBBS OCD

District I 17.13 N. French Dr., Hobbs, NM:88240 <u>District II.</u> 811/S. First St., Artesia, NM 88210 <u>District III</u> 1000 Rio Brazos Road, Aztec, NM 87410 <u>District IV</u> 1720 S. St. Francis Pro. Canta.Pc, NM 87505

State of New Mexico

DEC 0 912014 Minerals and Natural Resources

Form C-141 Revised August 8, 2011

Oil Conservation Division Submit 1 Copy accenter 220 South St. Francis Dr.

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

DEC 1 1 2014

Santa Fe, NM 87505

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Appendix B Laboratory Analysis

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



June 26, 2015

HACK CONDER BASIN ENVIRONMENTAL - HOBBS 419 W. CAIN HOBBS, NM 88240

RE: VGEU WELL # 34

Enclosed are the results of analyses for samples received by the laboratory on 06/26/15 11:00.

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:

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

Received:	06/26/2015	Sampling Date:	06/26/2015
Reported:	06/26/2015	Sampling Type:	Soil
Project Name:	VGEU WELL # 34	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: 5 POINT BOTTOM COMPOSITE @ 2.5 ' (H501655-01)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	240	16.0	06/26/2015	ND	416	104	400	3.92	
TPH 8015M	mg	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	06/26/2015	ND	176	88.0	200	2.67	
DRO >C10-C28	<10.0	10.0	06/26/2015	ND	202	101	200	2.63	
Surrogate: 1-Chlorooctane	110	% 47.2-15	7						
Surrogate: 1-Chlorooctadecane	131	% 52.1-17	6						

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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

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager

Rush*

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

ARDINAL 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					ANALYSIS REQUEST													
Project Manage	r: Kyle Norman							P.O. #:																
Address: 419								Company: Basin								S								
City: Hobbs	State: NM	Zip): 8	824	0				tn:	-								S						
Phone #: 575-393-2967 Fax #: 575-393-0293					Ad	dre	ss:	419	9 W Cain						Cations/Anions									
Project #: Project Owner:					Cit	ty: H	Hob	obs				Σ		-	A'									
Project Name:	A D					1	_			Zip: 8824)	es	2		TPH	ns								
	Project Location: UGEU Well #34 Sampler Name: Chris Fibres									5-393-2		Chlorides	8015	BTEX		tio	S							
Sampler Name:										93-0293	01	ē	œ	E	Texas	Ca	TDS							
FOR LAB USE ONLY MATRIX			x		PRE			SAMPLI	NG	5	H	ш	e N											
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP	AINE	GROUNDWATER	WASTEWATER	SOIL	SLUDGE	OTHER :	ACID/BASE:	JICE / COOL	OTHER :	DATE	TIME		н			Complete						
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analyses. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including without imitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hyrourcher by Cardinal, tegrandless of whether such claim is based uson any of the above stated reserves or otherwise.

Relinquished By:	Time: Received By:	Phone Result: I Yes I No Add'I Phone #: Fax Result: I Yes I No Add'I Fax #: REMARKS: I Yes I No Add'I Fax #:
Relinquished By:	Date: 24/15 Received By:	email results: hconder@basinenv.com; knorman@basinenv.com; jkamplain@basinenv; lflores@basinenv; lweinheimer@basinenv;
Delivered By: (Circle One)	Sample Condition CHECKED BY:	cursanic@basinenv; sedwards@basinenv
Sampler - UPS - Bus - Other:	U. De DYes DYes (Initials)	environmental tech: CFleres @basinenv

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

Page 4 of 4



July 07, 2015

KYLE NORMAN BASIN ENVIRONMENTAL - HOBBS 419 W. CAIN HOBBS, NM 88240

RE: VGEU WELL # 34

Enclosed are the results of analyses for samples received by the laboratory on 07/02/15 8:59.

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,

Lope S. Moreno

Hope S. Moreno For Celey D. Keene Lab Director/Quality Manager



Analytical Results For:

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

Received:	07/02/2015	Sampling Date:	07/01/2015
Reported:	07/07/2015	Sampling Type:	Soil
Project Name:	VGEU WELL # 34	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: BACKFILL Pt.1 (H501702-01)

Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	208	16.0	07/06/2015	ND	432	108	400	0.00	
TPH 8015M	5M mg/kg								
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	07/06/2015	ND	197	98.6	200	3.89	
DRO >C10-C28	<10.0	10.0	07/06/2015	ND	206	103	200	3.95	
Surrogate: 1-Chlorooctane	104	% 47.2-15	7						
Surrogate: 1-Chlorooctadecane	ecane 106 % 52.1-17		6						

Sample ID: BACKFILL Pt.2 (H501702-02)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	07/06/2015	ND	432	108	400	0.00	
TPH 8015M	mg/kg Analyzed By:								
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	07/06/2015	ND	197	98.6	200	3.89	
DRO >C10-C28	<10.0	10.0	07/06/2015	ND	206	103	200	3.95	
Surrogate: 1-Chlorooctane	90.7	% 47.2-15	7						
Surrogate: 1-Chlorooctadecane	72.9 % 52.1-12		6						

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Lope S. Moreno

Hope S. Moreno For 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

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Hope S. Moreno-

Hope S. Moreno For Celey D. Keene, Lab Director/Quality Manager

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

RDINAL 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

Project Manager: Kyle Norman P.O. #: Address: 419 W Cain Company: Basin Address: 419 W Cain Attn: City: Hobbs State: NM Zip: 88240 Attn: Phone #: 575-393-2967 Fax #: 575-393-0293 Address: 419 W Cain	Company Name: ConocoPhillips				-					BI	L	170					A	NAL	YSIS	REQU	EST	
Address: 419 W Cain Company: Basin City: Hobbs State: NM Zip: 88240 Attn: City: Hobbs Fax #: 575-393-0293 Address: 419 W Cain Project #: Project Owner: City: Hobbs Project Mame: © P State: NM Zip: 88240 Project Mame: © P State: NM Zip: 88240 Project Mame: © P State: NM Zip: 88240 Project Location: UGE U Wettl # 34 Phone #: 575-393-0293 Sampler Name: Watti Wettl							1	P.0	. #:													
City: Hobbs State: NM Zip: 88240 Attn: City: Hobbs Fax #: 575-393-0293 Address: 419 W Cain Phone #: 575-393-2967 Fax #: 575-393-0293 Address: 419 W Cain Project #: Project Owner: City: Hobbs Project Name: CoP State: NM Zip: 88240 Project Location: JGE J Weil # 34 Phone #: 575-393-0293 Sampler Name: Charles Fax #: 575-393-0293 For Lab USE ONLY MATRIX PRESERV SAMPLING HDD. WOUD WIND BY MANNING BY								Company: Basin									S					
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analyses. All claims including those for negligence and any other cause whatsoever shall be deemed walved unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequental damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries,

er by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

affiliates or successors arising out of or related to the performance Relinquished By:	Date: 7-2-20(5 Received By:	Phone Result: Yes No Add'I Phone #: Fax Result: Yes No Add'I Fax #:
Relinquished By:	Time: Date: 2/15 Time: 8:59 Received By: 7	REMARKS: email results: hconder@basinenv.com; knorman@basinenv.com; ikamplain@basinenv; lflores@basinenv; lweinheimer@basinenv;
Delivered By: (Circle One) Sampler - UPS - Bus - Other:	U U Sample Condition Cool Intact U Yes U Yes No No No	cursanic@basinenv; sedwards@basinenv environmental tech: Cfloves @basinenv

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

Appendix C Photo Documentation

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

ConocoPhillips VGEU Well 034

Unit Letter G, Section 26, T17S, R35E



Initial release area, facing northeast

11/18/14



Scraping release, facing north

6/23/15



Initial release area, facing north

11/18/14



Excavating release, facing northwest

6/23/15



Exporting soil, facing southeast

6/23/15



Backfilling excavation, facing south

7/1/15



Importing caliche, facing northeast

6/23/15



Completed site, facing north

7/2/15



Completed site, facing northwest

7/2/15



Completed site, facing south

7/2/15

Appendix D Final C-141

Basin Environmental Service Technologies, LLC 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.

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						OPERATOR			🗌 Initial Report 🛛 Final Repor			
Name of Co	ompany: (ConocoPhill			Contact:							
Address:	29 Vacuun	n Complex I		ľ	Telephone No.							
Facility Name: VGEU Well 034						Facility Type: Oil Well						
Surface Ow	mer: NMO	NMOCD			API No. 3002502881							
				LOC	ATIO	OF RE	LEASE					
									/West Line County			
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Latitude 32.807603 Longitude -103.426794												
						OF REL						
Type of Rele	ase: Spill		Volume of Release: 92 BBLS			Volume Recovered: 50 BBLS						
Source of Re	lease: Stuff	ing Box		Date and Hour of Occurrence 7/06/2014 2:00 pm			Date and Hour of Discovery 7/07/2014 10:00 am					
Was Immedi	ate Notice (If YES, To Whom?			/////2014 10:00 dill						
			equired									
By Whom?		Date and Hour: 7/08/2014 3:00 pm										
Was a Watercourse Reached?						If YES, Volume Impacting the Watercourse.						
If a Watercou	urse was Im	nacted. Descr	ibe Fully.*									
On July 6, 20 stuffing box. X 2 inches de work order to Describe Are the base of th DRO values of caliche im analysis of Po GRO and DR I hereby certi regulations a public health should their of	114 at appro The spill o ceep. The toto premediate a Affected a a excavation of non-detect ported for b boint 1 return CO values of fy that the i ll operators or the envir operations h nument. In a	ximately 1400 ccurred due to tal volume of the area has b and Cleanup A n and sent to ct. A total of ackfill. A tot ed a chloride f non-detect. information gi are required to comment. The ave failed to a ddition, NMC	0 hrs, MST o worn out the spill w een submi Action Tak a commerce 140 yards al of two s level of 20 The site w ven above o report an acceptance adequately 0CD accep	F, a stuffing box 1 packing. The sp ras 11.75 barreis, tted and the area ten.*□ The release tial laboratory for of contaminated amples of the imp 08 mg/kg with GI as backfilled with is true and comp td/or file certain r te of a C-141 repo investigate and r	eak occu ill area v I barrel of will be ro- se area w r analysis soil were ported so RO and I in the clease ported to the release no port by the remediate	rred at the E vas measured of crude oil a emediated ac as excavated . Laboratory exported and il were taken DRO values on n, imported of e best of my otifications ar NMOCD m contaminati	EVGSAU 2622 VGSAU 035. MS in two sections; nd 10.75 barrels of cording to NMOO to 2.5 ft and a 5 p analysis returned d disposed of at a and sent to a con f non-detect. Lat caliche and contou knowledge and u and perform correc arked as "Final Ro on that pose a three the operator of the	SO isola 1) 30 ft. of produ CD guid point bo d a chlor NMOC nmercia boratory ured to t mderstar trive acti eport" d eat to gr	ted the wel X 18 ft. X ced water, elines. ttom compo- ide value o D approved l laboratory analysis o <u>he surroun</u> d that purs ons for rele oes not reli ound water	l and change 2 inches dec with 10 barr osite sample of 240 mg/kg d facility. A v for analysi f Point 2 ret ding location uant to NM eases which eve the oper s, surface wa	ed the p pp, 2) 1 rels rec was co g and G total c s. Laburned c a. OCD re may er rator of ter, hu	acking in the 2 ft. X 30 ft. overed. A ollected from RO and f 230 yards oratory hloride, alles and adanger 'liability man health
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Signature: Printed Name Title: Off E-mail Addre Date: 1-1		. t. robin		Cop, Com 575-391-51		Conditions of	Approval:			Attached 1RP 343		

* Attach Additional Sheets If Necessary