

RECEIVED By JKeyes at 7:15 am, Feb 01, 2016

APPROVED By JKeyes at 7:15 am, Feb 01, 2016

CONOCOPHILLIPS

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

EVGSAU 2622-002 (1RP-3396)

Termination Request

API No. 30-025-26573

Release Date: October 26th, 2014

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



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

January 29th, 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 EVGSAU 2622-002 (1RP-3396) UL/G sec. 26 T17S R35E API No. 30-025-26573

Mr. Keyes:

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 4.7 miles northeast of Buckeye, New Mexico at UL/G sec. 26 T17S R35E. NM OSE and BLM installed monitor well records indicate that groundwater will likely be encountered at a depth of approximately 57 +/- feet.

On October 26th, 2014, CoP discovered that a flow line had ruptured, releasing 6.27 barrels of produced water over 871 sq ft of caliche pad. None of this fluid was recovered. NMOCD was notified of the release on October 27th, 2014, and an initial C-141 was submitted to NMOCD for approval. NMOCD approved the C-141 on October 27th, 2014 (Appendix A).

Basin personnel were on site to assess the release on August 11th, 2015. The release was mapped and photographed. Two samples were collected at the surface and with depth, and representative samples were sent to a commercial laboratory for analysis. Laboratory analysis of Point 1 at the surface returned a chloride value of 21, 800 mg/kg, a Gasoline Range Organics (GRO) value of non-detect and a Diesel Range Organics (DRO) value of 4,550 mg/kg. At 6 inches bgs, Point 1 returned a chloride value of 3,680 mg/kg, a GRO value of non-detect and a DRO value of 55.3 mg/kg. Laboratory analysis of Point 2 at the surface returned a chloride value of 14,400 mg/kg, a GRO value of non-detect and a DRO value of 207 mg/kg. At 6 inches, Point 2 returned a chloride value of 176 mg/kg and GRO and DRO values of non-detect.

Based on the assessment, a Corrective Action Plan (CAP) was submitted to NMOCD August 24th, 2015. NMOCD approved the CAP August 27th, 2015. The CAP stated that the release area around Point 1 would be scraped down to 1 ft bgs and the release area around Point 2 would be scraped down to 6 inches bgs. Once the scrapes were completed, discreet bottom samples would be taken from each scrape and field tested for chlorides and organic vapors. If the field data indicated that the composite would not achieve chloride, Gasoline Range Organics (GRO) and Diesel Range Organics (DRO) readings below regulatory standards, the scrape would be would return values below regulatory standards. The discreet bottom samples 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 soil would be imported to the site to use as backfill. A sample of the imported soil would be taken to a commercial laboratory to confirm that the chloride reading was below regulatory standards. The scrape would be backfilled with the clean, imported caliche and contoured to the surrounding location.

CAP activities began September 1st, 2015. The release area around Point 1 was excavated to 1.5 ft bgs and the area around Point 2 was scraped to 6 inches bgs (Figure 1). A discreet bottom sample was taken from the base of each excavation and sent to a commercial laboratory for analysis. Laboratory analysis of Point 1 returned a chloride value of 80 mg/kg and a GRO value of non-detect and a DRO value of 10 mg/kg. Laboratory analysis of Point 2 returned a chloride value of 48 mg/kg, a GRO and DRO value of non-detect. A total of 55 cubic yards of contaminated soil were exported and disposed of at a NMOCD approved facility. A total of 55 cubic yards of top soil were imported for backfill. A sample of the imported top soil was taken and sent to a commercial laboratory for analysis. Laboratory analysis returned a chloride level of 32 mg/kg. The site was backfilled with the clean, 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 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 call me if you have any questions or wish to discuss the site.

Sincerely,

Kyle 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 State of New Mexico Energy Minerals and Natural Resources

OCT 2 Diffeonservation 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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				LOCA	TIO	N OF RE	LEASE					
Unit Letter G	Section 26	Township 17S	Range 35E	Feet from the 1430		South Line	Feet from the 1330	East/ East	West Line	County LEA		
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By Whom?	· · · · · · · · · · · · · · · · · · ·						Hour: 10/27/2014					
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E-mail Addr	ress: jay.c.ģ	arcia@col	nocoph	illips.com		Conditions of Size	f Approval:	and r	Detre	Attache	a 🗖	
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OCT 3 0 2014

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Appendix B Laboratory Analysis

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



September 04, 2015

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

RE: EVGSAU 2622-002

Enclosed are the results of analyses for samples received by the laboratory on 09/02/15 8:01.

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,

Celeg D. Keine

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:	09/02/2015	Sampling Date:	09/01/2015
Reported:	09/04/2015	Sampling Type:	Soil
Project Name:	EVGSAU 2622-002	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Judy Garcia
Project Location:	NOT GIVEN		

Sample ID: PT. 1 @ 1.5' (H502333-01)

Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	09/03/2015	ND	432	108	400	7.69	
TPH 8015M	mg,	/kg	Analyze	d By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	09/02/2015	ND	190	94.9	200	0.159	
DRO >C10-C28	10.0	10.0	09/02/2015	ND	206	103	200	0.564	
Surrogate: 1-Chlorooctane	75.0	% 47.2-15	7						
Surrogate: 1-Chlorooctadecane	79.8	% 52.1-17	6						

Sample ID: PT. 2 @ 6" (H502333-02)

Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	09/03/2015	ND	432	108	400	7.69	
TPH 8015M	mg	/kg	Analyze	d By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	09/02/2015	ND	190	94.9	200	0.159	
DRO >C10-C28	<10.0	10.0	09/02/2015	ND	206	103	200	0.564	
Surrogate: 1-Chlorooctane	73.5	% 47.2-15	7						
Surrogate: 1-Chlorooctadecane	76.1	% 52.1-17	6						

Cardinal Laboratories

*=Accredited Analyte

PLEASE NOTE: Liability and Damages. 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 client for 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 thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, 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 the services hereunder by Cardinal, regardless of whether such claims based upon any of the above stated reasons or otherwise. Results relate only to the sample identified above. This report shall not be reproduced except in full with written approval of Cardinal Loratories.

Celey 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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Analytical Results For:

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

Received:	09/02/2015	Sampling Date:	09/01/2015
Reported:	09/04/2015	Sampling Type:	Soil
Project Name:	EVGSAU 2622-002	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Judy Garcia
Project Location:	NOT GIVEN		

Sample ID: IMPORTED SOIL (H502334-01)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	09/03/2015	ND	432	108	400	7.69	

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keine

Celey D. Keene, Lab Director/Quality Manager



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 Analyte NOT DETECTED at or above the reporting limit

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 Relative Percent Difference
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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. Keene

Celey D. Keene, Lab Director/Quality Manager

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CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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City: Hobbs	State: NM Zip: 88240	Attn:					ons		
Phone #: 575-393-2967	Fax #: 575-393-0293	Address: 419 W Cain		_		-	nic		
Project #:	Project Owner:	City: Hobbs		1		1	/A		
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Appendix C Photo Documentation

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

ConocoPhillips EVGSAU 2622-002 Unit Letter G, Section 26, T17S, R35E



Initial release area, east

8/11/15



Initial release area, facing north



Initial release area, facing west

8/11/15



Excavating to 1.5', facing south

9/1/15



Excavation completed, facing north

9/1/15



Backfilling site, facing south

9/4/15



Excavation completed, facing south

9/1/15





Site completed, facing north

9/4/15



Site completed, facing southwest

9/4/15

Appendix D Final C-141

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

State of New Mexico Energy Minerals and Natural Resources

Form C-141 Revised August 8, 2011

Oil Conservation Division 1220 South St. Francis Dr.

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

1220 S. St. Fran	cis Dr., Santa	a Fe, NM 8750	5	Sa	anta Fo	e, NM 875	505					
			Rele	ease Notifie	catio	n and Co	orrective A	ction	L			
						OPERA '	ГOR		🗍 Initia	al Report	\boxtimes	Final Report
Name of Co	mpany: C	ConocoPhill	ips			Contact				F		I mar reepon
Address: 2						Telephone l	No.					
Facility Nat	ne: EVG	SAU 2622-	002			Facility Typ	be Well					
Surface Ow	ner: NM	OCD		Mineral ()wner:	NMOCD			API No	. 30-025-3	4835	
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Signature:	- Lan	Al	<u>`</u>				OIL CON	<u>SERV</u>	~		<u>)N</u>	
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E-mail Addre		wine Cap.		575-390-80		Conditions of	f Approval:			Attached 1RP 339		

Attach Additional Sheets If Necessary