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By JKeyes at 3:30 pm, Apr 20, 2016

APPROVED

ConocoPhillips

P.O. Box 2197

Houston, TX 77252-2197

Phone 281.293.1000

**Red Hills West State 16 W2 CTB
(RP-4254)
Corrective Action Plan**

Release Date: April 14, 2016

Unit D, Section 16, Township 26S, Range 32E

April 20, 2016

Jamie Keyes

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 Red Hills West State 16 W2 CTB (RP-4254)**

Mr. Keyes:

ConocoPhillips (CoP) has prepared this Corrective Action Plan (CAP) to address potential environmental concerns at the above-referenced site.

Background and Previous Work

On Thursday April 14, 2016 at 0345, a release of produced water occurred due to a ruptured hose associated with de-oiler operations, resulting in the release of 25 BBLs of produced water (approximately 20 BBLs of produced water spilled to lined containment (with all recovered) and 5 BBLs of produced water spilled to ground). Immediate action was to shut down the pumps, recover produced water in containment, replace the hose, and return equipment back to service. NMOCD was notified of the release on April 14, 2016, and an initial C-141 was submitted (Appendix A).

COP personnel were on site to visually assess the release on April 15, 2016. The release was mapped and photographed (Appendix B). Based on the assessment, the release will be excavated down 6 inches bgs. Once the excavation is completed, a composite field screening sample from the bottom of the excavation will be taken and field tested for chlorides and organic vapors. If the field screening indicates that the composite will not achieve chloride, Gasoline Range Organics (GRO), Diesel Range Organics (DRO) and BTEX readings below regulatory standards, the excavation will be deepened until confirmation sampling (from three discrete samples collected from the excavation bottom) indicates that all constituents are below regulatory standards. The confirmation samples will be taken to a commercial laboratory to confirm that chloride, GRO, DRO and BTEX readings are below regulatory standards.

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

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

Please call me if you have any questions or wish to discuss the site. Sincerely,

Philip Lee, CIH, CSP
HSE Senior Specialist
(432) 688-6866

Attachments:

Figure 1 – Site Map

Appendix A – Initial C-141

Appendix B – Photo Documentation

Figure 1 – Site Map



Appendix A – Initial C-141

District I
1625 N. Franch 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

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

OPERATOR

Initial Report Final Report

Name of Company: ConocoPhillips	Contact: Philip Lee
Address: 3695 Highway 285, Orla TX	Telephone No. 432-238-1050
Facility Name: Red Hills West State 16 W2 CTB	Facility Type: Central Tank Battery
Surface Owner: NMOCD	Mineral Owner: NMOCD
API No.	

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
D	16	26S	32E		North		West	LEA

Latitude N32°2'50" Longitude W103°40'30"

NATURE OF RELEASE

Type of Release: Spill	Volume of Release: 25 BBLs	Volume Recovered: 20 BBLs
Source of Release: Ruptured hose off of a de-oiler unit (see Lat/Long above).	Date and Hour of Occurrence: 04/14/2016 03:45 am	Date and Hour of Discovery: 04/14/2016 03:45 am
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Jamie Keyes, NMOCD	
By Whom? Philip Lee	Date and Hour: 04/14/2016 09:10 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.*

Describe Area Affected and Cleanup Action Taken.*

A 25 BBL Produced Water release occurred on the ConocoPhillips Red Hills W2 CTB located in Lea County, New Mexico: During de-oiler operations our MSO noticed steam coming from the pumps on the de-oiler skid. Upon closer inspection noticed that water that was leaking from one of the hoses. The water was leaking into the containment but some of the water was splashing out onto the ground. MSO contacted de-oiler operators then shut down the pumps. Once the pumps were off and the area deemed safe, the water hauler on location recovered the produced water in containment. The leak resulted in approximately 20 BBLs of produced water spilled to lined containment (with all recovered) and 5 BBLs of produced water spilled to ground. Location will be remediated in accordance with NMOCD and COPC policies with confirmation soil samples.

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: Philip Lee	Approval Date:	Expiration Date:
Title: HSE	Conditions of Approval:	
E-mail Address: philip.p.lee@conocophillips.com	Attached <input type="checkbox"/>	
Date: 04/18/2016	Phone: 432-238-1050	

* Attach Additional Sheets If Necessary

Appendix B – Photo Documentation



View looking towards the south of the de-oiler skid (4/15/2016)



