



**RECEIVED**

*By JKeyes at 8:10 am, May 23, 2016*

Conditionally

**APPROVED**

**Sidewall samples should be included with the closure report to ensure complete horizontal delineation/remediation.**

# CONOCOPHILLIPS

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

**EVGSAU 2155-001**  
(1RP-3673)

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## Corrective Action Plan

API No. 30-025-27315

Release Date: January 3<sup>rd</sup>, 2015

Unit Letter O, Section 21, Township 17S, Range 35E



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

**May 20<sup>th</sup>, 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 EVGSAU 2155-001 (1RP-3673)  
UL/O sec. 21 T17S R35E  
API No. 30-025-27315**

Mr. Keyes:

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 2.75 miles northeast of Buckeye, New Mexico at UL/O sec. 21 T17S R35E. NM OSE and Basin installed monitor well records indicate that groundwater will likely be encountered at a depth of approximately 66 +/- feet.

On June 15<sup>th</sup>, 2015, CoP discovered a release from a ½ inch plug. A total of 29.81 barrels of oil was released over 3,002 sq ft of caliche pad with 7 barrels recovered. NMOCD was notified of the release on June 15<sup>th</sup>, 2015, and an initial C-141 was submitted the same day. NMOCD approved the initial C-141 on June 16<sup>th</sup>, 2015 (Appendix A).

On May 3<sup>rd</sup>, 2016, Basin personnel were on site to assess the release. Two points within the release area were sampled with depth (Figure 1). All samples were field tested for chlorides and organic vapors, and representative samples were taken to a commercial laboratory for analysis (Appendix B).

Photo Documentation of these activities may be found in Appendix C.

**Corrective Action Plan**

Based on the assessment, the release will be scraped down to 1 ft bgs. All excavated soil will be taken to a NMOCD approved facility for disposal. Clean soil will be imported to the site to serve as backfill. A sample of the backfill soil will be taken to a commercial laboratory to

confirm that the chloride reading is below regulatory standards. The lease pad will be backfilled with clean, imported caliche. The site will be contoured to the surrounding location.

Once these activities have been completed, a report will be sent to NMOCB 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,

A handwritten signature in cursive script that reads "Kyle Norman". The signature is written in black ink and includes a horizontal line extending to the right from the end of the name.

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

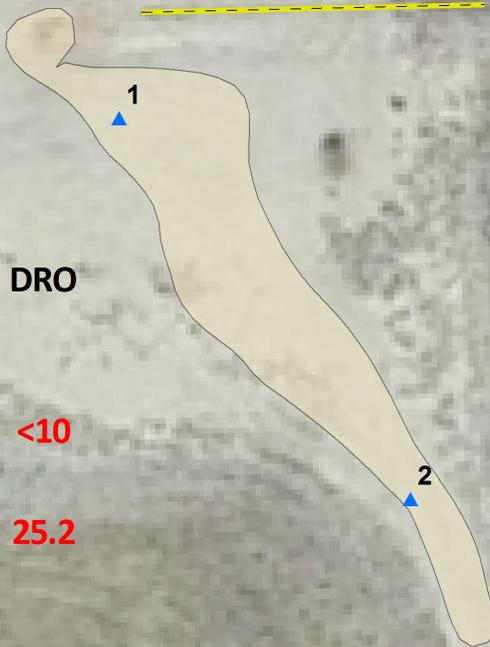
Attachments:

- Figure 1 – Initial sampling data
- Appendix A – Initial C-141
- Appendix B – Laboratory Analysis
- Appendix C – Photo Documentation

# Figures

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

# Initial Sampling Data



### Vertical 1

Depth	Cl-	PID	GRO	DRO
SS	1235	0.8		
6"	384	0.4		
1'	400	0.7	<10	<10
1.5'	281	0.6		
2'	240	0.5	<10	25.2

### Vertical 2

Depth	Cl-	PID	GRO	DRO
SS	2559	0.9		
6"	462	0.2		
1'	320	0.5	<10	<10
1.5'	217	0.4		
2'	160	0.6	<10	60.8

Landowner: State  
DGW: 66 ft

### Legend

- ▲ VERTICAL POINT
- BURIED FIBERGLASS LINE
- ROAD
- STAIN (3,002 sq ft)



**CONOCOPHILLIPS**  
**EVGSAU 2155-001**  
1RP3673

LEGALS: UL/ O SEC. 21  
T-17-S R-35-E  
LEA COUNTY, NM

**Underground facilities are spatially projected and need to be field verified.**

GPS: 32.81646343232, -103.46227693

0 25 50  
Feet

GPS date: 6/29/15 CF, 5/3/16 JK  
Drawing date: 5/4/16

Drafted by: L. Weinheimer, T. Grieco



# Appendix A

Intial C-141

**Basin Environmental Service Technologies, LLC**  
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

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: <b>ConocoPhillips</b>	Contact: <b>Jay Garcia</b>
Address: <b>29 Vacuum Complex Lane</b>	Telephone No. <b>575-704-2455</b>
Facility Name: <b>EVGSAU 2155-001</b>	Facility Type: <b>Battery</b>

Surface Owner: <b>NMOCD</b>	Mineral Owner:	API No. <b>30-025-2731500</b>
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**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
O	21	17S	35E	1175	North	2500	East	LEA

Latitude 32.8164634323229 Longitude -103.462276932915

**NATURE OF RELEASE**

Type of Release: <b>Leak</b>	Volume of Release: 29.81 bbl. of produced water.	Volume Recovered: 7 bbl. of produced water.
Source of Release: Discharge Line	Date and Hour of Occurrence 06/15/2015 12:00 pm	Date and Hour of Discovery 06/15/2015 12:00 pm
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <b>Tomas Oberding / Kellie Jones</b>	
By Whom? <b>Jay Garcia</b>	Date and Hour: <b>06/15/2015 3:45 pm</b>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

ENV – Agency Reportable – 29.81 bbls Produced Water – EVGSAU 2155-001 – RR II – MCBU – Buckeye: On Monday June 15, 2015 at 1200 MDT, at EVGSAU 2155-001 an agency reportable spill was found during normal rounds. The leak originated from the threads on a 1/2 inch plug and resulted in a release of 29.81 bbls of produced water, with 7 bbls recovered. The spill will be reported to NMOCD and will be remediated according to COPC guidelines. This is not a PSE. Consequence: 1, Likelihood: 5, RR: 2

**RECEIVED**

By OCD District 1 at 12:00 pm, Jun 16, 2015

Describe Area Affected and Cleanup Action Taken.\*

Release of 29.81 barrels of produced water with 7 barrels recovered. Affected area was 115 foot by 140 foot X 2 inch deep on caliche pad. The affected area 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: <i>Jay Garcia</i>		<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Jay Garcia		Approved by Environmental Specialist: <i>Kellie Jones</i>	
Title: LEAD HSE		Approval Date: <b>06/16/2015</b>	Expiration Date: <b>09/19/2015</b>
E-mail Address: <b>jay.c.garcia@conocophillips.com</b>		Conditions of Approval: <b>Site samples required. Delineate and remediate as per MNOCD guides. Geotag photographs of remediation required.</b>	
Date: 01/06/2015	Phone: 575-704-2455	Attached <input type="checkbox"/> 217817 <b>IRP-3673</b>	

\* Attach Additional Sheets If Necessary

nKJ1516743465  
pKJ1516743702

# Appendix B

Laboratory Analysis

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



May 20, 2016

KYLE NORMAN

Basin Environmental Service

P.O. Box 301

Lovington, NM 88260

RE: EVGSAU 2155-001

Enclosed are the results of analyses for samples received by the laboratory on 05/19/16 13:50.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-15-7. 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](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

Cardinal Laboratories is accredited 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,

A handwritten signature in black ink that reads "Mike Snyder". The signature is fluid and cursive, written in a professional style.

Mike Snyder For Celey D. Keene

Lab Director/Quality Manager

**Analytical Results For:**

 Basin Environmental Service  
 KYLE NORMAN  
 P.O. Box 301  
 Lovington NM, 88260  
 Fax To: (575) 396-1429

Received:	05/19/2016	Sampling Date:	05/19/2016
Reported:	05/20/2016	Sampling Type:	Soil
Project Name:	EVGSAU 2155-001	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

**Sample ID: PT. 1 @ 1' (H601097-01)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>400</b>	16.0	05/20/2016	ND	416	104	400	3.77	
TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	05/19/2016	ND	173	86.3	200	4.67	
DRO >C10-C28	<10.0	10.0	05/19/2016	ND	179	89.6	200	9.25	
<i>Surrogate: 1-Chlorooctane</i>	<i>72.4 %</i>	<i>35-147</i>							
<i>Surrogate: 1-Chlorooctadecane</i>	<i>92.3 %</i>	<i>28-171</i>							

**Sample ID: PT. 1 @ 2' (H601097-02)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>240</b>	16.0	05/20/2016	ND	416	104	400	3.77	
TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	05/19/2016	ND	173	86.3	200	4.67	
<b>DRO &gt;C10-C28</b>	<b>25.2</b>	10.0	05/19/2016	ND	179	89.6	200	9.25	
<i>Surrogate: 1-Chlorooctane</i>	<i>73.0 %</i>	<i>35-147</i>							
<i>Surrogate: 1-Chlorooctadecane</i>	<i>93.9 %</i>	<i>28-171</i>							

Cardinal Laboratories

\*=Accredited Analyte

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager

**Analytical Results For:**

 Basin Environmental Service  
 KYLE NORMAN  
 P.O. Box 301  
 Lovington NM, 88260  
 Fax To: (575) 396-1429

 Received: 05/19/2016  
 Reported: 05/20/2016  
 Project Name: EVGSAU 2155-001  
 Project Number: NONE GIVEN  
 Project Location: NOT GIVEN

 Sampling Date: 05/19/2016  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: PT. 2 @ 1' (H601097-03)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>320</b>	16.0	05/20/2016	ND	416	104	400	3.77	
TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	05/19/2016	ND	173	86.3	200	4.67	
DRO >C10-C28	<10.0	10.0	05/19/2016	ND	179	89.6	200	9.25	
<i>Surrogate: 1-Chlorooctane</i>		74.1 %	35-147						
<i>Surrogate: 1-Chlorooctadecane</i>		97.5 %	28-171						

**Sample ID: PT. 2 @ 2' (H601097-04)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>160</b>	16.0	05/20/2016	ND	416	104	400	3.77	
TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	05/19/2016	ND	173	86.3	200	4.67	
<b>DRO &gt;C10-C28</b>	<b>60.8</b>	10.0	05/19/2016	ND	179	89.6	200	9.25	
<i>Surrogate: 1-Chlorooctane</i>		68.6 %	35-147						
<i>Surrogate: 1-Chlorooctadecane</i>		90.4 %	28-171						

Cardinal Laboratories

\*=Accredited Analyte

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Mike Snyder 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



---

Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



# 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

*RUSH*

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

### BILL TO

### ANALYSIS REQUEST

Company Name: Conoco Phillips  
 Project Manager: Kyle Norman  
 Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Phone #: \_\_\_\_\_ Fax #: \_\_\_\_\_  
 Project #: \_\_\_\_\_ Project Owner: \_\_\_\_\_  
 Project Name: \_\_\_\_\_  
 Project Location: EVGSAU 2155-001  
 Sampler Name: Jacob Kamplain  
 P.O. #: \_\_\_\_\_ Company: Basin Environmental  
 Attn: \_\_\_\_\_ Address: 419 W. Cain  
 City: Hobbs State: NM Zip: 88240  
 Phone #: \_\_\_\_\_ Fax #: \_\_\_\_\_

Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX						DATE	TIME	Chlorides	TPH 8015 M	BTEX	Texas TPH	Complete Cations/Anions	TDS
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :								
<u>H1601097</u>			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5/19/16	09:30	<input checked="" type="checkbox"/>									
	Pl. 1 @ 1 ft.		1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5/19/16	09:40	<input checked="" type="checkbox"/>									
	Pl. 1 @ 2 ft.		1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5/19/16	10:00	<input checked="" type="checkbox"/>									
	Pl. 2 @ 1 ft.		1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5/19/16	10:15	<input checked="" type="checkbox"/>									
	Pl. 2 @ 2 ft.		1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5/19/16	10:15	<input checked="" type="checkbox"/>									

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 the client for the analysis. 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 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 services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Relinquished By: [Signature] Date: 5-19-16 Time: 1:50  
 Received By: [Signature] Date: \_\_\_\_\_ Time: \_\_\_\_\_  
 Delivered By: (Circle One) UPS - Bus - Other: 1.0°C #54  
 Sample Condition: Cool  Intact   
 Yes  No  Yes  No

CHECKED BY: [Signature]  
 Phone Result:  Yes  No  Add'l Phone #: \_\_\_\_\_  
 Fax Result:  Yes  No  Add'l Fax #: \_\_\_\_\_  
 REMARKS: email results: knorman@basinenv.com; jkamplain@basinenv.com; tgrieco@basinenv.com

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476  
*corrected 1.7°C*

# Appendix C

Photo Documentation

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

# ConocoPhillips EVGSAU 2155-001

Unit Letter O, Section 21, T17S, R35E



Initial release, facing north west 5/3/2016



Initial release, facing south east 5/3/2016



Excavating vertical 1, facing north east 5/19/2016



Hammer hoe vertical 1, facing north east 5/19/2016