

**RECEIVED**

By JKeyes at 12:38 pm, Aug 24, 2016



**APPROVED**

2 Confirmation bottom samples to be taken as indicated on map.

# CONOCOPHILLIPS

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

**EVGSAU 3236-004**  
(1RP-3923)

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## Corrective Action Plan

API No. 30-025-02979

Release Date: October 15<sup>th</sup>, 2015

Unit Letter K, Section 32, Township 17S, Range 35E



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

**August 23, 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 3236-004 (1RP-3923)  
UL/K sec. 32 T17S R35E  
API No. 30-025-02979**

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 1.7 miles southeast of Buck Eye, New Mexico. The initial C-141 states that the site is located at UL/F Sec. 32 T17S R35E. However, GIS mapping shows the site to be located within UL/K Sec. 32 T17S R35E. NM OSE, BLM and Basin installed monitor well records indicate that groundwater will likely be encountered at a depth of approximately 75 +/- feet.

On October 15<sup>th</sup>, 2015, CoP discovered a flow line leak. A total of 9 barrels produced water and 10 barrels of oil was released over 3,182 sq ft of pasture land. 4 barrels of produced water and 4 barrels of oil was recovered. NMOCD was notified of the release on October 16<sup>th</sup>, 2015, and an initial C-141 was submitted same day. NMOCD approved the initial C-141 on October 16<sup>th</sup>, 2015 (Appendix A).

Basin personnel were on site to assess the release January 27<sup>th</sup>, 2016. The release was mapped and photographed (Figure 1). On August 10<sup>th</sup>, 2016 Field samples were collected at surface and taken with depth and representative samples were sent 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 area around vertical 1 will be excavated to a depth of 2 feet bgs. The release area around vertical 2 will be excavated to a depth of 1.5 feet bgs. Once all excavations are complete, discreet wall samples from the excavation will be collected and field

tested for chlorides and organic vapors. If the field data indicates that the wall samples will not achieve chloride, Gasoline Range Organics (GRO), Diesel Range Organics (DRO) readings below regulatory standards, the walls of the excavation will be extended until field testing indicates that all constituents from the wall samples will return values below regulatory standards. The samples will then be taken to a commercial laboratory to confirm that all constituents return readings are below regulatory standards.

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 and the pasture will be backfilled with clean, imported top soil. The site will be contoured to the surrounding location.

Revegetation of the site will be performed as follows:

Disturbed areas associated with the remediation efforts will be reseeded. If after one growing season the vegetation has not taken hold, seeding may need to be repeated until revegetation is successful. The seed will be spread using a hand-held broadcaster and the area raked or dragged to cover the seed. Because the seed will be broadcast, the pounds per acre will be doubled. BLM #2 LPC seed mix will be used.

The seed mixture will be planted in the amounts specified in pounds of pure live seed (PLS) per acre. Commercially sold seed will be either certified or registered. The area will be seeded following backfilling of the excavated area.

The site will be visited on a quarterly basis to assess the establishment of vegetative growth. Staff personnel performing the site visit will also look for the presence of noxious weeds at the site. If a noxious weed is observed at the site, CoP will determine the most effective manner to eradicate it.

Once these activities have been completed, a report will be sent to NMOCD and BLM 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 – Proposed Excavation

Appendix A – Initial C-141

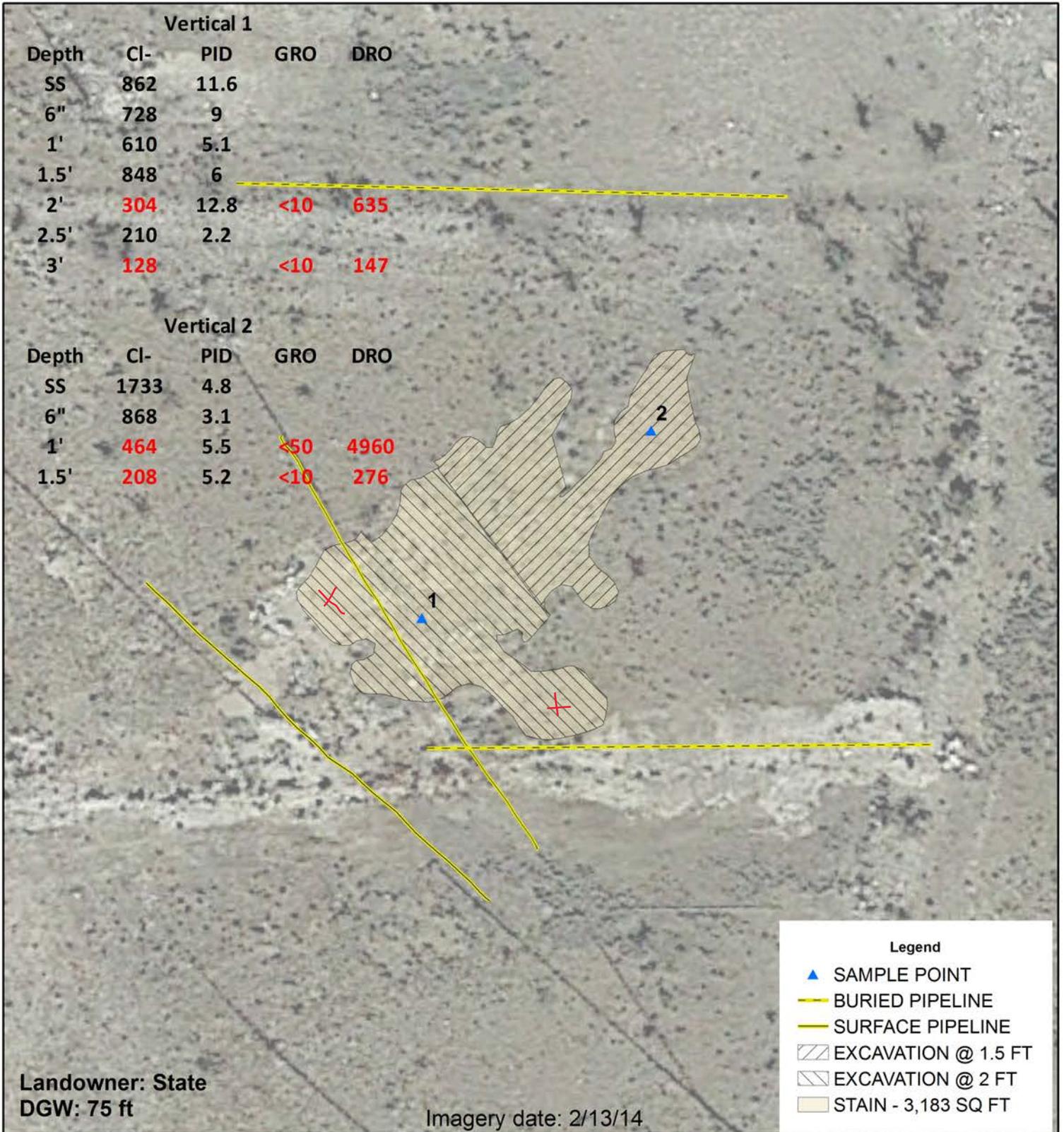
Appendix B – Laboratory Analysis

Appendix C – Photo Documentation

# Figures

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

# Proposed Excavation



**Vertical 1**

Depth	Cl-	PID	GRO	DRO
SS	862	11.6		
6"	728	9		
1'	610	5.1		
1.5'	848	6		
2'	304	12.8	<10	635
2.5'	210	2.2		
3'	128		<10	147

**Vertical 2**

Depth	Cl-	PID	GRO	DRO
SS	1733	4.8		
6"	868	3.1		
1'	464	5.5	<50	4960
1.5'	208	5.2	<10	276

**Legend**

- ▲ SAMPLE POINT
- BURIED PIPELINE
- SURFACE PIPELINE
- / / / / EXCAVATION @ 1.5 FT
- / / / / EXCAVATION @ 2 FT
- / / / / STAIN - 3,183 SQ FT

Landowner: State  
DGW: 75 ft

Imagery date: 2/13/14



**CONOCOPHILLIPS**  
**EVGSAU 3236-004**  
1RP-3923  
UL K SECTION 32  
T-17-S R-35-E  
LEA COUNTY, NM

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

GPS: 32.790675 -103.480333

0 10 20  
HHH Feet

GPS date: 1/27/16 JK, 8/10/16 KN  
Drawing date: 8/15/16  
Drafted by: 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

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: <b>ConocoPhillips</b>	Contact: <b>Spencer Cluff</b>
Address: <b>29 Vacuum Complex Lane</b>	Telephone No. <b>575-746-7248</b>
Facility Name: <b>EVGSAU 3236-004</b>	Facility Type: <b>Well</b>

Surface Owner: NMOCD	Mineral Owner: NMOCD	API No. 30-025-02979
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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
F	32	17S	35E	1980	North	1980	West	LEA

Latitude 32.7933311 Longitude 103.4820251 NAD83

**NATURE OF RELEASE**

Type of Release: <b>Spill</b>	Volume of Release: 19 BBLS	Volume Recovered: 8 BBLS
Source of Release: Flow line	Date and Hour of Occurrence 10/15/2015 12:00 am	Date and Hour of Discovery 10/15/2015 2:00 pm
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <b>Jamie Keyes</b>	
By Whom? <b>Spencer Cluff</b>	Date and Hour: <b>10/16/2015 9:20 am</b>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

**RECEIVED**

**By JKeyes at 12:30 pm, Oct 16, 2015**

If a Watercourse was Impacted, Describe Fully.\*  
Describe Cause of Problem and Remedial Action Taken.\*

On Oct. 15, 2015 at 1400 hrs MDT a flow line leak occurred at the EVGSAU 3236-004, which released 8 BPW and 10 BO with 4 BPW and 4 BO recovered. Spill area is approximately 75'x75' with a depth of 2" in pasture area and will be remediated according to NMOCD and COPC guidelines.

Describe Area Affected and Cleanup Action Taken.\*  
Immediate action by the MSO was to shut down the well and isolate the flowline. A work order has been submitted to repair the line. 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.

**OIL CONSERVATION DIVISION**

Signature: <i>Spencer A. Cluff</i>	Approved by Environmental Specialist: <i>Jamie Keyes</i>	
Printed Name: Spencer A. Cluff	Approval Date: 10/16/2015	Expiration Date: 12/16/2015
Title: LEAD HSE	Conditions of Approval: Discrete site samples required. Delineate and remediate per NMOCD guidelines. Geotagged photos of remediation required.	
E-mail Address: <b>spencer.a.cluff@conocophillips.com</b>	Attached <input type="checkbox"/> IRP 3923	
Date: 10/16/2015	Phone: 575-746-7248	

\* Attach Additional Sheets If Necessary

pJXX1528944902

nJXX1528944722

# Appendix B

Laboratory Analysis

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

August 12, 2016

KYLE NORMAN

Basin Environmental Service

P.O. Box 301

Lovington, NM 88260

RE: EVGSAU 3236-004

Enclosed are the results of analyses for samples received by the laboratory on 08/11/16 11:30.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-16-8. 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,



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: 08/11/2016  
 Reported: 08/12/2016  
 Project Name: EVGSAU 3236-004  
 Project Number: NONE GIVEN  
 Project Location: CONOCO PHILLIPS

 Sampling Date: 08/10/2016  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: PT. 1 @ 2' (H601791-01)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>304</b>	16.0	08/11/2016	ND	448	112	400	3.64	
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	08/12/2016	ND	193	96.3	200	2.73	
<b>DRO &gt;C10-C28</b>	<b>635</b>	10.0	08/12/2016	ND	197	98.4	200	3.77	

Surrogate: 1-Chlorooctane 85.6 % 35-147

Surrogate: 1-Chlorooctadecane 114 % 28-171

**Sample ID: PT. 2 @ 1' (H601791-02)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>464</b>	16.0	08/11/2016	ND	448	112	400	3.64	
TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<50.0	50.0	08/12/2016	ND	193	96.3	200	2.73	
<b>DRO &gt;C10-C28</b>	<b>4960</b>	50.0	08/12/2016	ND	197	98.4	200	3.77	

Surrogate: 1-Chlorooctane 96.1 % 35-147

Surrogate: 1-Chlorooctadecane 153 % 28-171

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 claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



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: 08/11/2016  
 Reported: 08/12/2016  
 Project Name: EVGSAU 3236-004  
 Project Number: NONE GIVEN  
 Project Location: CONOCO PHILLIPS

 Sampling Date: 08/10/2016  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: PT. 2 @ 1.5' (H601791-03)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>208</b>	16.0	08/11/2016	ND	448	112	400	3.64	
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	08/12/2016	ND	193	96.3	200	2.73	
<b>DRO &gt;C10-C28</b>	<b>276</b>	10.0	08/12/2016	ND	197	98.4	200	3.77	

Surrogate: 1-Chlorooctane 86.0 % 35-147

Surrogate: 1-Chlorooctadecane 88.6 % 28-171

Cardinal Laboratories

\*=Accredited Analyte

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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





**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

*RUSH*

**CHAIN-OF-CUSTODY AND ANALYSIS REQUEST**

Company Name: **Conoco Phillips**

Project Manager: **Kyle Norman**

Address:

City:

Phone #:

Project #:

Project Name:

Project Location:

Sampler Name:

FOR LAB USE ONLY

**BILL TO**

P.O. #: **Conoco Phillips**

Company: **Basin Environmental**

Attn:

Address: **419 W. Cain**

City: **Hobbs**

State: **NM** Zip: **88240**

Phone #:

Fax #:

**ANALYSIS REQUEST**

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 :	ACID/BASE:								
H001791	Pt. 1 @ 2 ft.		1								8-10-16	2:00						
	Pt. 2 @ 1 ft.		2								8-10-16	2:30						
	Pt. 2 @ 1.5 ft.		3								8-10-16	3:00						

Relinquished By:

*[Signature]*

Date: **8-11-16**

Time: **11:30**

Received By:

*[Signature]*

Date:

Time:

Delivered By: (Circle One)

Sampler - UPS - Bus - Other:

**-16.82**

Sample Condition  
Cool  Intact   
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  
**Justin Wright**

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

**#75**



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

---

August 15, 2016

KYLE NORMAN

Basin Environmental Service

P.O. Box 301

Lovington, NM 88260

RE: EVGSAU 3236-004

Enclosed are the results of analyses for samples received by the laboratory on 08/12/16 11:10.

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Celey D. Keene

Lab Director/Quality Manager

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

 Received: 08/12/2016  
 Reported: 08/15/2016  
 Project Name: EVGSAU 3236-004  
 Project Number: NONE GIVEN  
 Project Location: CONOCO PHILLIPS

 Sampling Date: 08/10/2016  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Celey D. Keene

**Sample ID: PT. 1 @ 3' (H601799-01)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>128</b>	16.0	08/12/2016	ND	448	112	400	3.64	
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	08/12/2016	ND	197	98.4	200	0.494	
<b>DRO &gt;C10-C28</b>	<b>147</b>	10.0	08/12/2016	ND	197	98.7	200	0.0887	

Surrogate: 1-Chlorooctane 87.3 % 35-147

Surrogate: 1-Chlorooctadecane 95.0 % 28-171

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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Samples reported on an as received basis (wet) unless otherwise noted on report





# Appendix C

Photo Documentation

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

# ConocoPhillips EVGSAU 3236-004

Unit Letter K, Section 32, T17S, R35E



Initial Release, facing NE 1/27/2016



Initial Release, facing SW 1/27/2016



Installing vertical #1, facing W 8/10/2016



Installing vertical #2, facing S 8/10/2016