

REVIEWED

By Kristen Lynch at 10:54 am, Oct 24, 2016

NMOCD
APPROVED
Corrective Action Plan

Notify NMOCD Prior to Sampling
to allow witnessing opportunity.

ConocoPhillips

P.O. Box 2197

Houston, TX 77252-2197

Phone 281.293.1000

Buck Federal CTB

(RP-4431)

Corrective Action Plan

NMLC 068281B

Release Date: September 6, 2016

Unit P, Section 17, Township 26S, Range 32E

April 28, 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 Buck Federal CTB
NMLC 068281B**

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 Tuesday the 6th, 2016 at 12:00 am, a release of produced water occurred due to a faulty T joint resulting in the release of 240 BBLs of produced water with 235 BBLs of water recovered. Immediate action was to shut down and replace the T joint. NMOCD was notified of the release on September 6, 2016, and an initial C-141 was submitted (Appendix A).

COP personnel were on site to visually assess the release on September 6th. 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, discrete samples will be taken and field tested for chlorides and organic vapors. If the field data indicates that the individual samples will not achieve chloride, Gasoline Range Organics (GRO), Diesel Range Organics (DRO) and BTEX readings below regulatory standards, the excavation will be deepened until field testing indicates that all constituents from bottom discrete samples will return values below regulatory standards. Five discrete samples will be collected in total. Four surface samples will be collected just outside the berm on all four sides. The fifth sample will be from the center of the spill and will go down as deep as the spill penetrated. The samples will then 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. 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,

Joseph McLaughlin
HSE Specialist
(806) 567-2790

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. 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: ConocoPhillips	Contact: Joseph McLaughlin
Address: 3695 Highway 285, Orla TX	Telephone No. 806-567-2790
Facility Name: Buck Federal 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
P	17	26S	32E		North		West	LEA

Latitude N32°2'14" Longitude W103°41'48"

NATURE OF RELEASE

Type of Release: Produced Water Spill	Volume of Release: 240 BBLs	Volume Recovered: 235 BBLs
Source of Release: Produced Water tank over flow (see Lat/Long above).	Date and Hour of Occurrence 09/5/2016 10:00 pm	Date and Hour of Discovery 09/6/2016 12:00 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 Trishia, BLM	
By Whom? Joseph McLaughlin	Date and Hour: 09/6/2016 08:15 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 240 BBL Produced Water release occurred on the ConocoPhillips Buck Federal CTB located in Lea County, New Mexico: MSO was making his rounds when he noticed water inside the berm located around the oil and water tanks. When inspecting it more closely, the water was coming from a broken water line located on the filtration line near the filters. MSO shut down the water filtration pumps and closed the line that comes from tanks to the pump. MSO called to notify supervisor and had a water truck vacuum out the produced water from the berm.

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: Joseph McLaughlin	OIL CONSERVATION DIVISION	
	Approved by Environmental Specialist:	
Printed Name: Joseph McLaughlin	Approval Date:	Expiration Date:
Title: HSE	Conditions of Approval:	
E-mail Address: Joe.P.McLaughlin@conocophillips.com	Attached <input type="checkbox"/>	

Appendix B – Photo Documentation



View looking towards the South (9/6/2016)