



August 7, 2014

Oil Conservation Division
District 2 – Artesia
811 S. First St.
Artesia, NM 88210

Re: Gissler Federal #13H
30-015-38121
Sec. 5, T17S-R30E
Eddy County, NM

Mr. Mike Bratcher,

COG Operating LLC would like to submit for your consideration the enclosed work plan for the above captioned well. The plan is in response to the C-141 Initial report dated July 21, 2014.

Background

The release was caused by a heater treater, when a gasket on the lower manway ruptured and caused a spray of fluid. The majority of the release was contained within the lined facility and was able to be recovered and the gravel replaced. A small pooling area, to the north of the berm, was impacted outside the berm measuring approximately 2700 square feet. A secondary area impacted by a light spray to the north of the battery, approximately 39,000 square feet. This area was addressed with an initial treatment of Micro-Blaze®.

Groundwater

Based on the Chevron Trend Maps, the release area would be classified at a site ranking of Zero due to the depth of groundwater at approximately 250'. No well information could be found for Section 5.

Soil Assessment and Analytical Results

Initial soil samples were taken on 7/25/2014 of the heavily impacted area outside the berm. Samples indicated TPH and BTEX are above RRALs for site ranking zero in S1 but not in S2. S1 analysis indicates 42,700 mg/kg TPH and 1530 mg/kg BTEX at 2 foot depth but decreased to RRALs at 4 foot depth. Chloride concentrations in the two sampling areas (S1 and S2) were at levels run-inhibiting of vegetative growth. (see attached site diagram)

Work Plan

COG proposes the excavation of the 1500 square feet in the high impact spill area behind the battery (see diagram) at a depth of 2.5'. This is approximately 125 yards of material. The area will be backfilled with like material. (See attached diagram)

If there are no objections or further stipulations, COG Operating LLC would like to begin the remediation process based on approval of this work plan. Please feel free to contact my with any questions or concerns at (505) 350-1336

Sincerely,



Amanda Trujillo

Senior Environmental Scientist

Enclosed

- (1) C-141 Initial (Copy)
- (2) Site Diagram and Summary Table
- (3) Laboratory Analysis

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, 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 October 10, 2003

Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

| | | | |
|-------------------------|---|-------------------------|-------------------------------|
| Name of Company | COG OPERATING LLC | Contact | Robert McNeill |
| Address | 600 West Illinois Avenue, Midland, TX 79701 | Telephone No. | 432-230-0077 |
| Facility Name | Gissler Federal #13H | Facility Type | Battery |
| Surface Owner : Federal | | Mineral Owner : Federal | Lease No. (API#) 30-015-38121 |

LOCATION OF RELEASE

| Unit Letter | Section | Township | Range | Feet from the | North/South Line | Feet from the | East/West Line | County |
|-------------|---------|----------|-------|---------------|------------------|---------------|----------------|--------|
| L | 5 | 17S | 30E | 1650 | South | 330 | West | Eddy |

Latitude Longitude

NATURE OF RELEASE

| | | |
|---|---|----------------------------|
| Type of Release | Volume of Release | Volume Recovered |
| Produced water and Condensate | 30 bbls Oil; 15 bbls PW | 28 bbls Oil; 12 bbls PW |
| Source of Release | Date and Hour of Occurrence | Date and Hour of Discovery |
| Heater treater inside battery | 07-09-2014 11:00 pm | 07-09-2014 11:00 pm |
| Was Immediate Notice Given? | If YES, To Whom? | |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required | Mike Bratcher – NMOCD/Jeffery Robertson – BLM | |
| By Whom? Amanda Trujillo | Date and Hour 07-11-2014 05:54 pm | |
| Was a Watercourse Reached? | If YES, Volume Impacting the Watercourse. | |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | |

If a Watercourse was Impacted, Describe Fully.*


Describe Cause of Problem and Remedial Action Taken.*

Gasket on the lower manway of the heater treater ruptured causing fluid to spray from the vessel. All free standing fluids picked up and disposed of at an NMOCD approved facility.

Describe Area Affected and Cleanup Action Taken.*

Main impact area was contained within the bermed area. An area approximately 115' x 25' found directly behind the separating equipment received heavier impact. Adjacent to this area is a 335' x 180' area which is low impact spray area. All free fluids have been recovered. COG will have the spill site sampled to delineate any possible contamination from the release and we will present a remediation work plan to the NMOCD for approval prior to any significant remediation work.

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:  | OIL CONSERVATION DIVISION | | |
| Printed Name: Amanda Trujillo | Approved by District Supervisor: | | |
| Title: Senior Environmental Coordinator | Approval Date: | Expiration Date: | |
| E-mail Address: atrujillo@concho.com | Conditions of Approval: | | Attached <input type="checkbox"/> |
| Date: 07-21-2014 | Phone: 575-748-6940 | | |

* Attach Additional Sheets If Necessary

Gissler Federal #13H

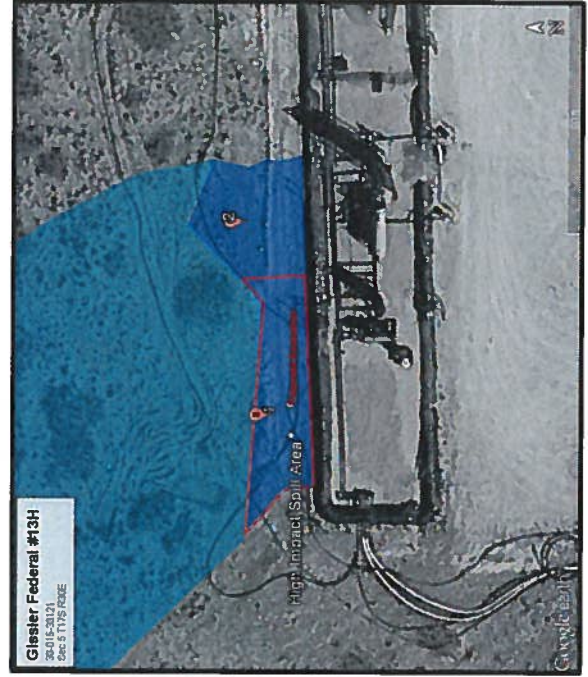


Gissler Federal #13H
 30-015-38121
 Sec 5 T17S R30E

Site Ranking: Zero
Depth to GW per Trend Maps: 250'

| S1 | DRO | GRO | TPH | BTEX | CI- |
|----|-------|-------|--------------|-------------|-------|
| 2' | 30800 | 11900 | 42700 | 1530 | 32 |
| 4' | <10.0 | <10.0 | <10.0 | 0.661 | 16 |
| S2 | DRO | GRO | TPH | BTEX | CI- |
| 1' | 17.9 | <10.0 | 17.9 | <0.300 | 16 |
| 3' | <10.0 | <10.0 | <10.0 | <0.300 | <16.0 |

Bold values exceed RRALs per NMOCD Guidelines (1993)



Gissler Federal #13H
 30-015-38121
 Sec 5 T17S R30E



August 01, 2014

AMANDA TRUJILLO
COG OPERATING
P. O. BOX 1630
ARTESIA, NM 88210

RE: GISSLER FEDERAL #13H

Enclosed are the results of analyses for samples received by the laboratory on 07/25/14 15:10.

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/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,

Hope S. Moreno For Celey D. Keene
Lab Director/Quality Manager

Analytical Results For:

 COG OPERATING
 AMANDA TRUJILLO
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

 Received: 07/25/2014
 Reported: 08/01/2014
 Project Name: GISSLER FEDERAL #13H
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 07/23/2014
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: S1 2' (H402292-01)

| BTEX 8021B | | mg/kg | | Analyzed By: MS | | | | S-04 | | |
|-----------------------|-------------|-----------------|------------|-----------------|------|------------|---------------|------|-----------|--|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | |
| Benzene* | 62.8 | 10.0 | 07/29/2014 | ND | 1.96 | 98.1 | 2.00 | 7.18 | | |
| Toluene* | 477 | 10.0 | 07/29/2014 | ND | 2.00 | 100 | 2.00 | 6.57 | | |
| Ethylbenzene* | 400 | 10.0 | 07/29/2014 | ND | 2.02 | 101 | 2.00 | 6.74 | | |
| Total Xylenes* | 587 | 30.0 | 07/29/2014 | ND | 6.09 | 102 | 6.00 | 6.61 | | |
| Total BTEX | 1530 | 60.0 | 07/29/2014 | ND | | | | | | |

Surrogate: 4-Bromofluorobenzene (PID) 141 % 89.4-126

| Chloride, SM4500Cl-B | | mg/kg | | Analyzed By: AP | | | | | | |
|----------------------|-------------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | |
| Chloride | 32.0 | 16.0 | 07/31/2014 | ND | 416 | 104 | 400 | 3.77 | | |

| TPH 8015M | | mg/kg | | Analyzed By: MS | | | | S-06 | | |
|------------------------|--------------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | |
| GRO C6-C10 | 11900 | 200 | 07/29/2014 | ND | 179 | 89.7 | 200 | 3.76 | | |
| DRO >C10-C28 | 30800 | 200 | 07/29/2014 | ND | 191 | 95.4 | 200 | 1.78 | | |

Surrogate: 1-Chlorooctane 407 % 65.2-140

Surrogate: 1-Chlorooctadecane 655 % 63.6-154

Cardinal Laboratories

*=Accredited Analyte

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Hope S. Moreno For Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

 COG OPERATING
 AMANDA TRUJILLO
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

 Received: 07/25/2014
 Reported: 08/01/2014
 Project Name: GISSLER FEDERAL #13H
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 07/23/2014
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: S1 4' (H402292-02)

| BTEX 8021B | | mg/kg | | Analyzed By: MS | | | | | |
|-----------------------|--------------|-----------------|------------|-----------------|------|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Benzene* | 0.092 | 0.050 | 07/29/2014 | ND | 1.96 | 98.1 | 2.00 | 7.18 | |
| Toluene* | 0.266 | 0.050 | 07/29/2014 | ND | 2.00 | 100 | 2.00 | 6.57 | |
| Ethylbenzene* | 0.129 | 0.050 | 07/29/2014 | ND | 2.02 | 101 | 2.00 | 6.74 | |
| Total Xylenes* | 0.173 | 0.150 | 07/29/2014 | ND | 6.09 | 102 | 6.00 | 6.61 | |
| Total BTEX | 0.661 | 0.300 | 07/29/2014 | ND | | | | | |

Surrogate: 4-Bromofluorobenzene (PID) 124 % 89.4-126

| Chloride, SM4500Cl-B | | mg/kg | | Analyzed By: AP | | | | | |
|----------------------|-------------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Chloride | 16.0 | 16.0 | 07/31/2014 | 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 | 07/29/2014 | ND | 179 | 89.7 | 200 | 3.76 | |
| DRO >C10-C28 | <10.0 | 10.0 | 07/29/2014 | ND | 191 | 95.4 | 200 | 1.78 | |

Surrogate: 1-Chlorooctane 125 % 65.2-140

Surrogate: 1-Chlorooctadecane 138 % 63.6-154

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Hope S. Moreno For Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

 COG OPERATING
 AMANDA TRUJILLO
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

 Received: 07/25/2014
 Reported: 08/01/2014
 Project Name: GISSLER FEDERAL #13H
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 07/23/2014
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: S2 1' (H402292-03)

| BTEX 8021B | | mg/kg | | Analyzed By: MS | | | | | | |
|----------------|--------|-----------------|------------|-----------------|------|------------|---------------|------|-----------|--|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | |
| Benzene* | <0.050 | 0.050 | 07/29/2014 | ND | 1.96 | 98.1 | 2.00 | 7.18 | | |
| Toluene* | <0.050 | 0.050 | 07/29/2014 | ND | 2.00 | 100 | 2.00 | 6.57 | | |
| Ethylbenzene* | <0.050 | 0.050 | 07/29/2014 | ND | 2.02 | 101 | 2.00 | 6.74 | | |
| Total Xylenes* | <0.150 | 0.150 | 07/29/2014 | ND | 6.09 | 102 | 6.00 | 6.61 | | |
| Total BTEX | <0.300 | 0.300 | 07/29/2014 | ND | | | | | | |

Surrogate: 4-Bromofluorobenzene (PID) 124 % 89.4-126

| Chloride, SM4500Cl-B | | mg/kg | | Analyzed By: AP | | | | | | |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier | |
| Chloride | 16.0 | 16.0 | 07/31/2014 | 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 | 07/29/2014 | ND | 179 | 89.7 | 200 | 3.76 | | |
| DRO >C10-C28 | 17.9 | 10.0 | 07/29/2014 | ND | 191 | 95.4 | 200 | 1.78 | | |

Surrogate: 1-Chlorooctane 130 % 65.2-140

Surrogate: 1-Chlorooctadecane 143 % 63.6-154

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*=Accredited Analyte

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Hope S. Moreno For Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

 COG OPERATING
 AMANDA TRUJILLO
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

 Received: 07/25/2014
 Reported: 08/01/2014
 Project Name: GISSLER FEDERAL #13H
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 07/23/2014
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: S2 3' (H402292-04)

| BTEX 8021B | | mg/kg | | Analyzed By: MS | | | | | |
|----------------|--------|-----------------|------------|-----------------|------|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Benzene* | <0.050 | 0.050 | 07/29/2014 | ND | 1.96 | 98.1 | 2.00 | 7.18 | |
| Toluene* | <0.050 | 0.050 | 07/29/2014 | ND | 2.00 | 100 | 2.00 | 6.57 | |
| Ethylbenzene* | <0.050 | 0.050 | 07/29/2014 | ND | 2.02 | 101 | 2.00 | 6.74 | |
| Total Xylenes* | <0.150 | 0.150 | 07/29/2014 | ND | 6.09 | 102 | 6.00 | 6.61 | |
| Total BTEX | <0.300 | 0.300 | 07/29/2014 | ND | | | | | |

Surrogate: 4-Bromofluorobenzene (PID) 124 % 89.4-126

| Chloride, SM4500Cl-B | | mg/kg | | Analyzed By: AP | | | | | |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Chloride | <16.0 | 16.0 | 07/31/2014 | 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 | 07/28/2014 | ND | 171 | 85.6 | 200 | 0.932 | |
| DRO >C10-C28 | <10.0 | 10.0 | 07/28/2014 | ND | 178 | 89.0 | 200 | 3.57 | |

Surrogate: 1-Chlorooctane 113 % 65.2-140

Surrogate: 1-Chlorooctadecane 120 % 63.6-154

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*=Accredited Analyte

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Hope S. Moreno For Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

- S-06 The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.
- S-04 The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
- QM-4X The spike recovery was outside of QC acceptance limits for the MS and/or MSD due to analyte concentration at 4 times or greater the spike concentration. The QC batch was accepted based on LCS and/or LCSD recoveries within the acceptance limits.
- 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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*=Accredited Analyte

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Hope S. Moreno

Hope S. Moreno For Celey D. Keene, Lab Director/Quality Manager



101 East Marland, Hobbs, NM 88240
 (575) 393-2326 FAX (575) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

BILL TO ANALYSIS REQUEST

Company Name: COG Operating LLC
 Project Manager: Amanda Trujillo
 Address: 2208 West Main
 City: Artesia State: NM Zip: 88210
 Phone #: (575) 748-6930 Fax #: [blank]
 Project #: [blank] Project Owner: [blank]
 Project Name: Gissler Federal #13H
 Project Location: [blank]
 Sampler Name: [blank]
 P.O. #: [blank] Company: COG Operating LLC
 Attn: Robert McNeill
 Address: 600 W Illinois
 City: Midland
 State: TX Zip: 79701
 Phone #: (432) 221-0388
 Fax #: [blank]

| Lab I.D. | Sample I.D. | (G)RAB OR (C)OMP. | # CONTAINERS | MATRIX | | | | | | PRESERV. | SAMPLING | DATE | TIME | BTEX | TPH | Chloride |
|----------|-------------|-------------------|--------------|-------------|------------|------|-----|--------|---------|----------|----------|------|------|------|-----|----------|
| | | | | GROUNDWATER | WASTEWATER | SOIL | OIL | SLUDGE | OTHER : | | | | | | | |
| H402292 | 51 2 | X | 1 | | X | X | X | | | X | 7/23/14 | 1 pm | X | X | X | |
| | 51 4 | X | 1 | | X | X | X | | | X | 7/23/14 | 1 pm | X | X | X | |
| | 52 3 | X | 1 | | X | X | X | | | X | 7/23/14 | 1 pm | X | X | X | |
| | 52 4 | X | 1 | | X | X | X | | | X | 7/23/14 | 1 pm | X | X | X | |
| | 53 3 | X | 1 | | X | X | X | | | X | 7/23/14 | 1 pm | X | X | X | |
| | 53 4 | X | 1 | | X | X | X | | | X | 7/23/14 | 1 pm | X | X | X | |

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Relinquished By: [Signature]
 Date: 7/25/14
 Time: 3:10
 Received By: [Signature]
 Date: 7/25/14
 Time: 3:10
 Requested By: [Signature]
 Delivered By: (Circle One) UPS - Bus - Other: [Signature]
 Sample Condition: Cool Intact
 Yes No
 4.80
 CHECKED BY: [Signature]
 Phone Result: Yes No
 Fax Result: Yes No
 Add'l Phone #: [blank]
 Add'l Fax #: [blank]
 REMARKS: [blank]

† Cardinal cannot accept verbal changes. Please fax written changes to 575-393-2476