



Amanda Trujillo Davis
Senior Environmental Coordinator

June 28, 2016

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

Re: Woolley Tank Battery
Sec. 28, T17S-R30E
Eddy County, NM

Mr. Mike Bratcher/Ms. Tucker,

COG Operating LLC would like to submit for your consideration the enclosed work plan and proposed closure for the above captioned well. The plan is in response to the C-141 Initial report dated April 1, 2016.

Background

This release was caused by a corroded nipple on a filter pot. All fluid was contained within the bermed area. A vacuum truck was dispatched to removal all standing fluids. This area was addressed with an initial scrap and all impacted material hauled to an NMOCD approved facility.

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 275'. No well information in the NMOSE database could be found for Section 28.

Analytical Results

Initial soil samples were taken on 3/31/2016. Samples indicated TPH and BTEX were within RRAIs for site ranking zero. Chloride concentration in the S1 sampling areas at 6" was elevated. (see attached site diagram)

Site Ranking: Zero

Depth to GW per SEO: >275'

S1	DRO	GRO	TPH	BTEX	CI-
6"	977	50	< 10.0	0.507	2440
1'	<10.0	<10.0	<10.0	<0.300	192
S2	DRO	GRO	TPH	BTEX	CI-
1'	90.9	< 10.0	90	<0.300	144
S3	DRO	GRO	TPH	BTEX	CI-
6"	27	< 10.0	27	<0.300	208
1'	< 10.0	< 10.0	< 10.0	<0.300	80
Bold values exceed RRALs per NMOCD Guidelines (1993)					

Work Plan

COG proposes the excavation of an additional 6" of material in S1 before backfill. If there are no objections or further stipulations, COG Operating LLC would like to request closure at this time. Please feel free to contact me with any questions or concerns at (505) 350-1336.

Sincerely,



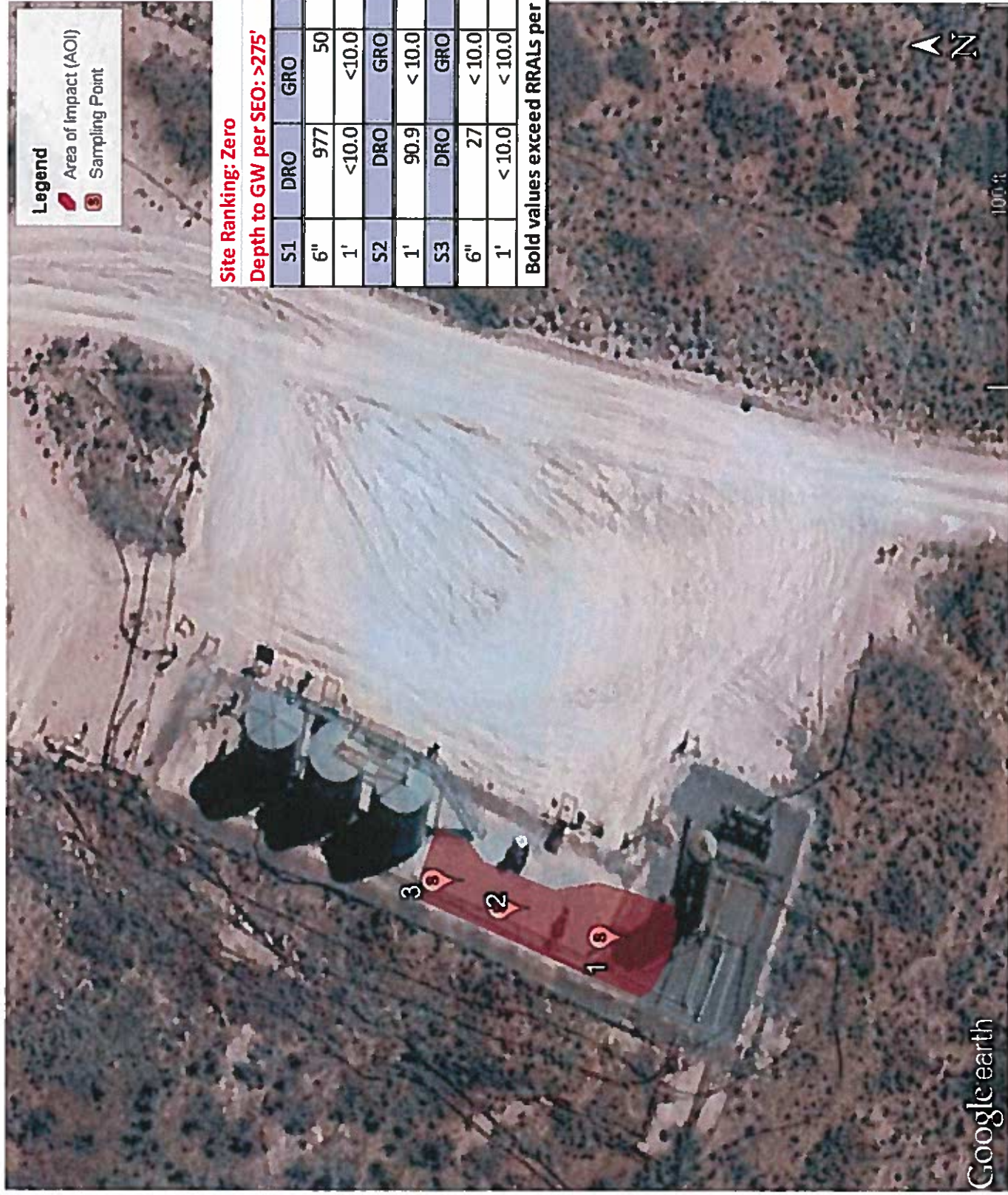
Amanda Trujillo Davis

Senior Environmental Coordinator

Enclosed

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

Woolley Federal Tank Battery



Site Ranking: Zero
Depth to GW per SEO: >275'

S1	DRO	GRO	TPH	BTEX	CI-
6"	977	50	<10.0	0.507	2440
1'	<10.0	<10.0	<10.0	<0.300	192
S2	DRO	GRO	TPH	BTEX	CI-
1'	90.9	<10.0	90	<0.300	144
S3	DRO	GRO	TPH	BTEX	GI-
6"	27	<10.0	27	<0.300	208
1'	<10.0	<10.0	<10.0	<0.300	80
Bold values exceed RRAIs per NMOCD Guidelines (1993)					

April 13, 2016

AMANDA TRUJILLO DAVIS

COG OPERATING

P. O. BOX 1630

ARTESIA, NM 88210

RE: WOOLLEY TANK BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 04/06/16 10:50.

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.

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:

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

 Received: 04/06/2016
 Reported: 04/13/2016
 Project Name: WOOLLEY TANK BATTERY
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 03/31/2016
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: S1 6" (H600746-01)

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	04/07/2016	ND	1.98	98.8	2.00	2.71	
Toluene*	<0.050	0.050	04/07/2016	ND	1.88	94.0	2.00	3.17	
Ethylbenzene*	<0.050	0.050	04/07/2016	ND	1.67	83.4	2.00	4.10	
Total Xylenes*	0.507	0.150	04/07/2016	ND	5.17	86.1	6.00	4.65	
Total BTEX	0.507	0.300	04/07/2016	ND					

Surrogate: 4-Bromofluorobenzene (PIC) 129 % 73.6-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	2440	16.0	04/07/2016	ND	416	104	400	0.00	

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	10.0	04/07/2016	ND	185	92.4	200	1.37	
DRO >C10-C28	977	10.0	04/07/2016	ND	180	89.8	200	6.73	QR-03

Surrogate: 1-Chlorooctane 82.7 % 35-147

Surrogate: 1-Chlorooctadecane 82.6 % 28-171

Cardinal Laboratories

* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

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

Received: 04/06/2016
Reported: 04/13/2016
Project Name: WOOLLEY TANK BATTERY
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 03/31/2016
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: S1 1' (H600746-02)

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	04/07/2016	ND	1.98	98.8	2.00	2.71	
Toluene*	<0.050	0.050	04/07/2016	ND	1.88	94.0	2.00	3.17	
Ethylbenzene*	<0.050	0.050	04/07/2016	ND	1.67	83.4	2.00	4.10	
Total Xylenes*	<0.150	0.150	04/07/2016	ND	5.17	86.1	6.00	4.65	
Total BTEX	<0.300	0.300	04/07/2016	ND					

Surrogate: 4-Bromofluorobenzene (PIE) 102 % 73.6-140

Chloride, SM4500Cl-B		mg/kg	Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	192	16.0	04/07/2016	ND	416	104	400	0.00	

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	04/07/2016	ND	185	92.4	200	1.37	
DRO >C10-C28	<10.0	10.0	04/07/2016	ND	180	89.8	200	6.73	

Surrogate: 1-Chlorooctane 75.2 % 35-147

Surrogate: 1-Chlorooctadecane 87.1 % 28-171

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Celely D. Keene, Lab Director/Quality Manager

Analytical Results For:

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

 Received: 04/06/2016
 Reported: 04/13/2016
 Project Name: WOOLLEY TANK BATTERY
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 03/31/2016
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: S2 6" (H600746-03)

BTEX 80218		mg/kg	Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	04/08/2016	ND	1.97	98.5	2.00	1.73	
Toluene*	<0.050	0.050	04/08/2016	ND	1.86	92.8	2.00	3.49	
Ethylbenzene*	<0.050	0.050	04/08/2016	ND	1.64	82.2	2.00	4.52	
Total Xylenes*	<0.150	0.150	04/08/2016	ND	5.09	84.9	6.00	4.15	
Total BTEX	<0.300	0.300	04/08/2016	ND					

Surrogate: 4-Bromofluorobenzene (PIC) 104 % 73 6-140

Chloride, SM4500Cl-B		mg/kg	Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	144	16.0	04/07/2016	ND	416	104	400	0.00	

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	04/07/2016	ND	185	92.4	200	1.37	
DRO >C10-C28	90.9	10.0	04/07/2016	ND	180	89.8	200	6.73	

Surrogate: 1-Chlorooctane 81.2 % 35-147

Surrogate: 1-Chlorooctadecane 93.9 % 28-171

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

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

Received: 04/06/2016
Reported: 04/13/2016
Project Name: WOOLLEY TANK BATTERY
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 03/31/2016
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: S3 6" (H600746-04)

BTEX 80218		mg/kg	Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	04/08/2016	ND	1.97	98.5	2.00	1.73	
Toluene*	<0.050	0.050	04/08/2016	ND	1.86	92.8	2.00	3.49	
Ethylbenzene*	<0.050	0.050	04/08/2016	ND	1.64	82.2	2.00	4.52	
Total Xylenes*	<0.150	0.150	04/08/2016	ND	5.09	84.9	6.00	4.15	
Total BTEX	<0.300	0.300	04/08/2016	ND					

Surrogate: 4-Bromofluorobenzene (PIC) 103 % 73.6-140

Chloride, SM4500Cl-B		mg/kg	Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	208	16.0	04/07/2016	ND	416	104	400	0.00	

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	04/07/2016	ND	185	92.4	200	1.37	
DRO >C10-C28	27.0	10.0	04/07/2016	ND	180	89.8	200	6.73	

Surrogate: 1-Chlorooctane 83.0 % 35-147

Surrogate: 1-Chlorooctadecane 82.3 % 28-171

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

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

 Received: 04/06/2016
 Reported: 04/13/2016
 Project Name: WOOLLEY TANK BATTERY
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 03/31/2016
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: S3 1' (H600746-05)

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	04/08/2016	ND	1.97	98.5	2.00	1.73	
Toluene*	<0.050	0.050	04/08/2016	ND	1.86	92.8	2.00	3.49	
Ethylbenzene*	<0.050	0.050	04/08/2016	ND	1.64	82.2	2.00	4.52	
Total Xylenes*	<0.150	0.150	04/08/2016	ND	5.09	84.9	6.00	4.15	
Total BTEX	<0.300	0.300	04/08/2016	ND					

Surrogate: 4-Bromofluorobenzene (PIC) 99.6 % 73 6-140

Chloride, SM4500Cl-B		mg/kg	Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	04/07/2016	ND	416	104	400	0.00	

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	04/07/2016	ND	185	92.4	200	1.37	
DRO >C10-C28	<10.0	10.0	04/07/2016	ND	180	89.8	200	6.73	

Surrogate: 1-Chlorooctane 74.3 % 35-147

Surrogate: 1-Chlorooctadecane 81.2 % 28-171

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Celest D. Keene, Lab Director/Quality Manager

Notes and Definitions

QR-03	The RPD value for the sample duplicate or MS/MSD was outside of QC acceptance limits due to matrix interference. QC batch accepted based on LCS and/or LCSD recovery and/or RPD values.
QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
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

Cardinal Laboratories***=Accredited Analyte**

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Celey D. Keene, Lab Director/Quality Manager

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: COG Operating LLC	Contact: Robert McNeill	
Address: 600 West Illinois Avenue, Midland TX 79701	Telephone No. 432-230-0077	
Facility Name: Woolley Tank Battery	Facility Type: Tank Battery	
Surface Owner: Federal	Mineral Owner:	API No. NA

LOCATION OF RELEASE

Unit Letter	Section 28	Township 17S	Range 30E	Feet from the	North/South Line	Feet from the	East/West Line	County Eddy
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Latitude 32.810986° Longitude -103.979151°

NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: 85 bbls PW	Volume Recovered: 75 bbls PW
Source of Release: Filter Pot	Date and Hour of Occurrence: 3/20/16 11:30 am	Date and Hour of Discovery: 3/20/16 11:30 am
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Mike Bratcher – NMOCD / Jim Amos – BLM	
By Whom? Robert Grubbs Jr.	Date and Hour: 3/21/2016 12:38 PM	
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.*

This release was caused by a corroded nipple on a filter pot. All fluid was contained within the bermed area. A vacuum truck was dispatched to removal all standing fluids.

Describe Area Affected and Cleanup Action Taken.*

The impacted area was to the south of the tanks inside the containment. This release was remediated under the guidance of the NMOCD and Bureau of Land Management.

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 Davis	Approved by Environmental Specialist:	
Title: Senior Environmental Coordinator	Approval Date:	Expiration Date:
E-mail Address: atrujillo@concho.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: June 27, 2016	Phone: 575-748-3940	

* Attach Additional Sheets If Necessary.