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December 27, 2018

Mike Bratcher  
New Mexico Energy, Minerals and Natural Resources Department  
Oil Conservation Division, District 2  
811 S. First Street  
Artesia, NM 88210

Ryan Mann  
Hobbs Field Office  
New Mexico State Land Office  
2827 N. Dal Paso St. Suite 117  
Hobbs, NM 88240

**Re: Site Assessment Summary and Deferral Request  
Graham Cracker 16 State #002H  
API No. 30-015-41533  
GPS: Latitude 32.05012 Longitude -104.09246  
UL "N", Sec. 9, T26S, R28E  
Eddy County, NM  
NMOCD Ref. No. 2RP-4645**

TRC Environmental Corporation (TRC), on behalf of COG Operating, LLC (COG), has prepared this *Site Assessment Summary and Deferral Request* for the Release Site known as the **Graham Cracker 16 State #002H**. Details of the release are summarized below:

RELEASE DETAILS			
<b>Type of Release:</b>	Produced Water	<b>Volume of Release:</b>	25 bbls
		<b>Volume Recovered:</b>	23 bbls
<b>Source of Release:</b>	Check Valve	<b>Date of Release:</b> 2/24/18	<b>Date of Discovery:</b> 2/24/18
<b>Was Immediate Notice Given?</b>	Yes	<b>If, YES, to Whom?</b>	NMOCD District II/NMSLO
<b>Was a Watercourse Reached?</b>	No	<b>If YES, Volume Impacting the Watercourse:</b>	NA
<b>Surface Owner:</b>	State	<b>Mineral Owner:</b>	State

**Describe Cause of Problem and Remedial Action Taken:**

The release was attributed to a failure in the check valve due to internal corrosion. The release filled the culvert or "tin horn" surrounding the check valve and the fluids were contained within, except for an approximate one hundred and fifty square foot area of overspill located on top of the adjoining pipeline right-of way. During initial response activities, free standing fluids were recovered utilizing a vacuum truck and the check valve was replaced.

Topographical and Aerial Maps are provided as Attachments #1 and #2, respectively. General Site Photographs are provided as Attachment #8. A Copy of the Initial Release Notification and Corrective Action (NMOCD Form C-141) is provided as Attachment #9.

## REGULATORY FRAMEWORK

Surface impacts from unauthorized releases of crude oil, gases, produced water, condensate or other oil field waste which occur during normal oilfield operations are generally regulated by the New Mexico Oil Conservation Division (NMOCD) in accordance with 19.15.29 of the New Mexico Administrative Code (NMAC). 19.15.29 NMAC establishes reporting, site assessment/characterization, remediation, closure, variance and enforcement procedures. Table I of 19.15.29.12 NMAC determines the closure criteria for soils impacted by a release based on the depth to groundwater and the following site characteristics:

Approximate Depth to Groundwater	
Approximate Depth to Groundwater	51-75 Ft.
Within 300 ft. of any continuously flowing or significant watercourse?	
Within 300 ft. of any continuously flowing or significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 200 ft. of any lakebed, sinkhole, or playa lake?	
Within 200 ft. of any lakebed, sinkhole, or playa lake?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 300 ft. of an occupied permanent residence, school, hospital, or institution?	
Within 300 ft. of an occupied permanent residence, school, hospital, or institution?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 500 ft. of a spring or private, domestic fresh water well?	
Within 500 ft. of a spring or private, domestic fresh water well?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 1,000 ft. of any fresh water well?	
Within 1,000 ft. of any fresh water well?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within the incorporated municipal boundaries or within a municipal well field?	
Within the incorporated municipal boundaries or within a municipal well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 300 ft. of a wetland?	
Within 300 ft. of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within the area overlying a subsurface mine?	
Within the area overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within an unstable area?	
Within an unstable area?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within a 100-year floodplain?	
Within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

A search of a groundwater database maintained by The New Mexico Office of the State Engineer (NMOSE) was conducted to determine the average depth to groundwater within a 1 Mile radius of the Release Site and identify any registered water wells within 1/2 Mile of the Release Site. If none were identified, the approximate depth to groundwater was extrapolated from a Depth to Groundwater Map utilized by the NMOCD. Depth to groundwater information is provided as Attachment #4.

Based on the approximate depth to groundwater and site characteristics, the NMOCD Closure Criteria are as follows:

Table I Closure Criteria for Soils Impacted by a Release			
Minimum depth below any point within the horizontal boundary of the release to ground water less than 10,000 mg/l TDS	Constituent	Method*	Limit**
51 feet-100 feet	Chloride***	EPA 300.0	10,000 mg/kg
	TPH (GRO+DRO+MRO)	EPA SW-846 Method 8015M	2,500 mg/kg
	TPH (GRO+DRO)	EPA SW-846 Method 8015M	1,000 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8260B	10 mg/kg

## INITIAL SITE ASSESSMENT

On **June 25, 2018**, TRC conducted an initial site assessment at the Site. During the initial site assessment, one (1) hand-augered soil bore was advanced within the "tin horn" to a depth of approximately ten (10) ft. bgs. During the advancement of the soil bore, **three (3) soil samples** (HA-1 @ 6', HA-1 @ 8' and HA-1 @ 10') were collected and field screened for concentrations of chloride. Chloride field test results suggest chloride concentrations exceeded the NMOCD Closure Criteria in each of the soil samples. Further advancement of the hand-augered soil bore was precluded due to the limitations of the hand-auger and safety concerns associated with confined space. Please reference the Field Observation Log provided as Attachment #5.

On **August 17, 2018**, TRC revisited the Site, and a geoprobe was utilized to collect **three (3) additional soil samples** from the overspill area adjacent to the "tin horn" in an effort to determine the vertical extent of soil impact. The collected soil samples were submitted to an NMOCD-approved laboratory for analysis of chloride concentrations.

On **October 25, 2018**, TRC revisited the Site, and a hand auger was utilized to collect **two (2) additional soil samples** from the overspill area adjacent to the "tin horn" in an effort to determine the extent of soil impacts at ground surface. The collected soil samples were submitted to an NMOCD-approved laboratory for analysis of BTEX, TPH, and chloride concentrations.

On **November 14, 2018**, TRC revisited the Site, and a hand auger was utilized to collect **two (2) additional soil samples** from sample points HA-1B and HA-1C in an effort to determine the vertical extent of soil impacts in the overspill area adjacent to the "tin horn". The collected soil samples were submitted to an NMOCD-approved laboratory for analysis of TPH concentrations. A table summarizing laboratory analytical results from soil samples collected during the above stated activities is provided below:

Concentrations of BTEX, TPH and/or Chloride in Soil											
Sample ID	Date	Depth	Soil Status	SW 846 8021B		SW 846 8015M Ext.					E 300
				Benzene (mg/kg)	BTEX (mg/kg)	GRO C <sub>6</sub> -C <sub>10</sub> (mg/kg)	DRO C <sub>10</sub> -C <sub>28</sub> (mg/kg)	GRO + DRO C <sub>6</sub> -C <sub>28</sub> (mg/kg)	ORO C <sub>28</sub> -C <sub>35</sub> (mg/kg)	TPH C <sub>6</sub> -C <sub>35</sub> (mg/kg)	Chloride (mg/kg)
SB-1 @ 6'	8/17/2018	6'	In-Situ	-	-	-	-	-	-	-	21,500
SB-1 @ 12'	8/17/2018	12'	In-Situ	-	-	-	-	-	-	-	4,910
SB-1 @ 14'	8/17/2018	14'	In-Situ	-	-	-	-	-	-	-	146
HA-1B @ Surface	10/25/2018	Surf.	In-Situ	<0.050	<0.300	<50.0	8,370	<b>8,370</b>	1,950	<b>10,320</b>	368
HA-1C @ Surface	10/25/2018	Surf.	In-Situ	<0.050	<0.300	<10.0	3,470	<b>3,470</b>	780	<b>4,250</b>	1,570
HA-1B @ 1'	11/14/2018	1'	In-Situ	-	-	<10.0	<10.0	<10.0	<10.0	<10.0	-
HA-1C @ 1'	11/14/2018	1'	In-Situ	-	-	<10.0	<10.0	<10.0	<10.0	<10.0	-
<b>Closure Criteria</b>				<b>10</b>	<b>50</b>	<b>-</b>	<b>-</b>	<b>1,000</b>	<b>-</b>	<b>2,500</b>	<b>10,000</b>

A "Site & Sample Location Map" is provided as Attachment #3. Field data is provided as Attachment #5. Laboratory analytical reports are provided as Attachment #6.

## DEFERRAL REQUEST

The Release occurred within in a "tin horn", affecting an area adjacent to and beneath a valve setting located at a depth of approximately six (6) ft. bgs. Laboratory analytical results from soil samples collected during the initial site assessment and subsequent site visits, indicate soil is not affected above the NMOCD Closure Criteria for chloride deeper than fourteen (14) ft. bgs. COG maintains excavation and backfilling of the affected area located beneath and adjacent to the valve setting would pose a risk which could result in potentially hazardous conditions and/or property damage. Based on laboratory analytical results, site characteristics and field observations made during the initial site assessment and subsequent site visits, COG requests remediation, restoration and reclamation be deferred until the equipment is removed during other operations and/or at time of abandonment, whichever comes first.

## RESTORATION, RECLAMATION AND RE-VEGETATION

Final remediation and reclamation will be conducted in accordance with 19.15.29.12 and 19.15.29.13 NMAC, when the site is no longer being utilized for oil and gas operations.

If you have any questions, or if additional information is required, please feel free to contact Becky Haskell or either of the undersigned by phone or email.

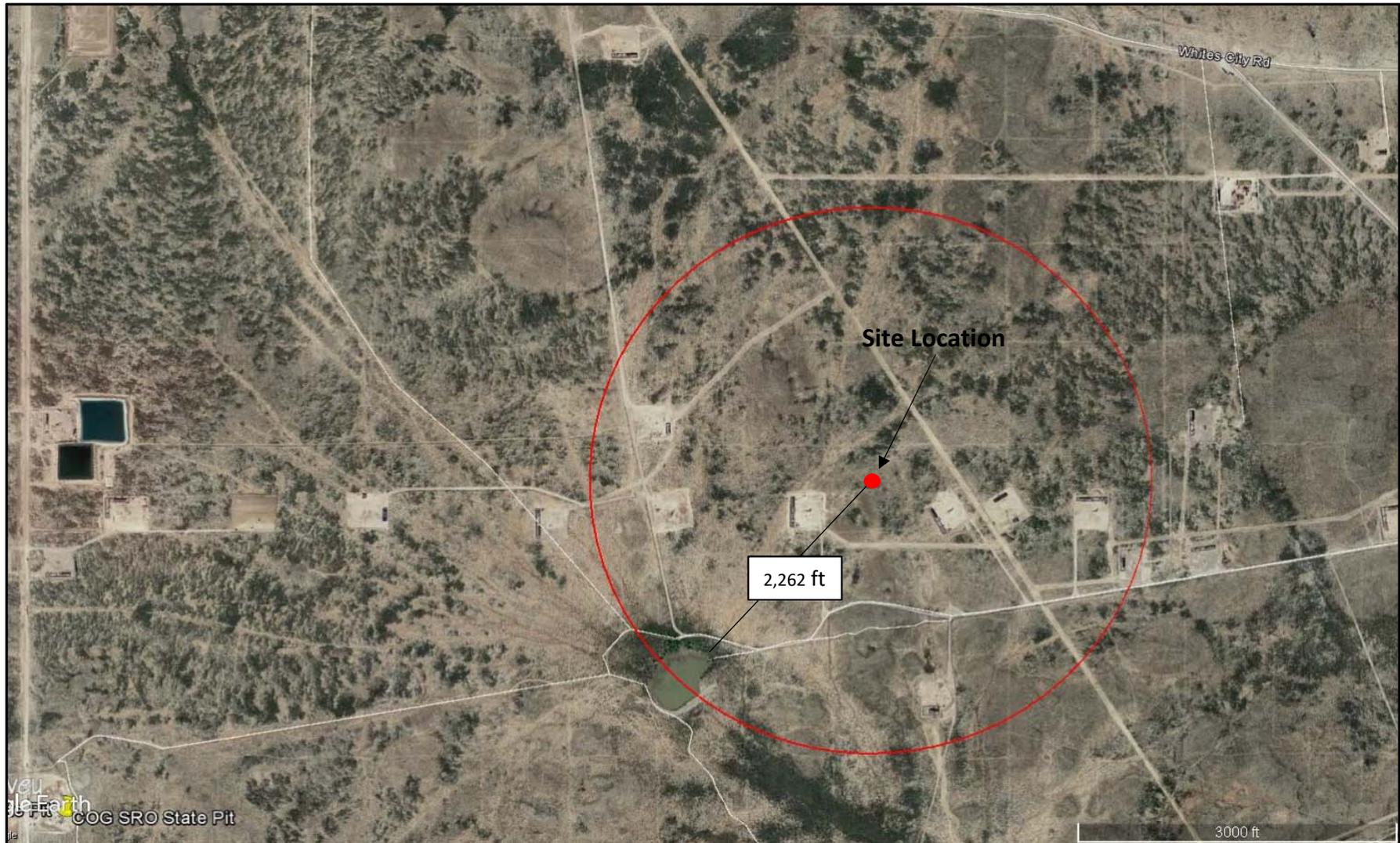
Respectfully,

Zachary Conder  
Operations Manager  
TRC Environmental Corp.

Curt Stanley  
Senior Project Manager  
TRC Environmental Corp.

<b>Attachments:</b>	Attachment #1-	Figure 1 - Topographical Map
	Attachment #2-	Figure 2 - Aerial Map
	Attachment #3-	Figure 3 - Site & Sample Location Map
	Attachment #4-	Depth to Groundwater Information
	Attachment #5	Field Data
	Attachment #6-	Laboratory Analytical Reports
	Attachment #7-	Soil Profile
	Attachment #8-	General Site Photographs
	Attachment #9-	Release Notification and Corrective Action (FORM C-141)





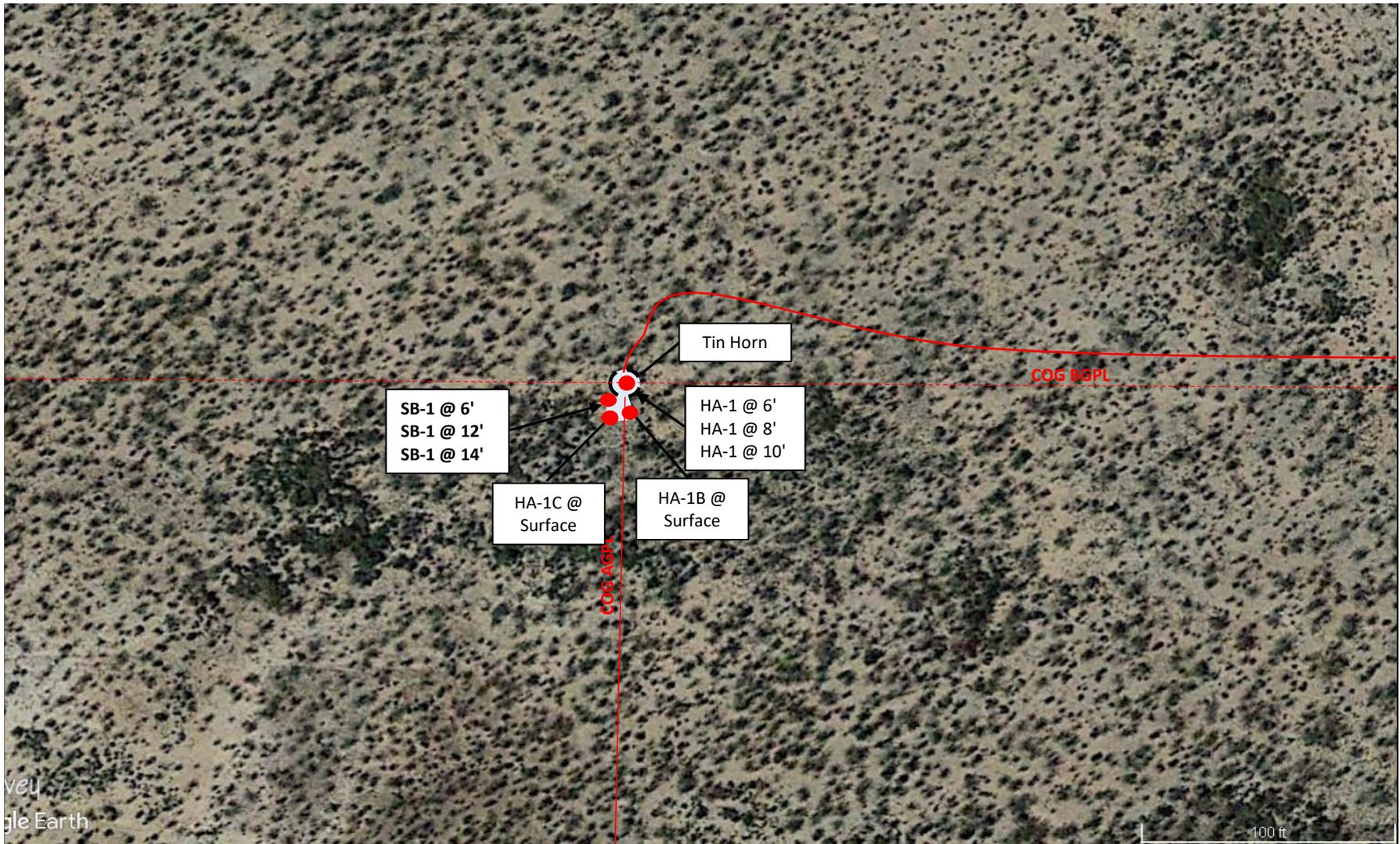
**LEGEND:**

	Site Location		Non-Industrial Building
	Fresh Water Well		Municipal Well Field
	100-Year Floodplain		Subsurface Mine
	High/Critical Karst		1/2 Mile Radius

**Figure 2**  
 Aerial Map  
 COG Operating, LLC  
 Graham Cracker 16 State #002H  
 Eddy County, NM

Drafted by: ZC   Checked by: JL		
Draft: March 7, 2018		
GPS:	32.05012	-104.09246
UL "N", Sec. 9, T26S, R28E		
TRC Proj. No:	299884	





**LEGEND:**

	Affected Area
	Sample Location

**Figure 3**

Site & Sample Location Map  
 COG Operating, LLC  
 Graham Cracker 16 State #002H  
 Eddy County, NM

Drafted by: BC   Checked by: ZC		
Draft: November 5, 2018		
GPS:	32.05012	-104.09246
UL "N", Sec. 9, T26S, R28E		
TRC Proj. No:	299884	





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*New Mexico Office of the State Engineer*  
**Water Column/Average Depth to Water**

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(quarters are 1=NW 2=NE 3=SW 4=SE)  
(quarters are smallest to largest) (NAD83 UTM in meters)

No records found.

**UTMNA83 Radius Search (in meters):**

**Easting (X):** 585676.4

**Northing (Y):** 3546352.2

**Radius:** 1610

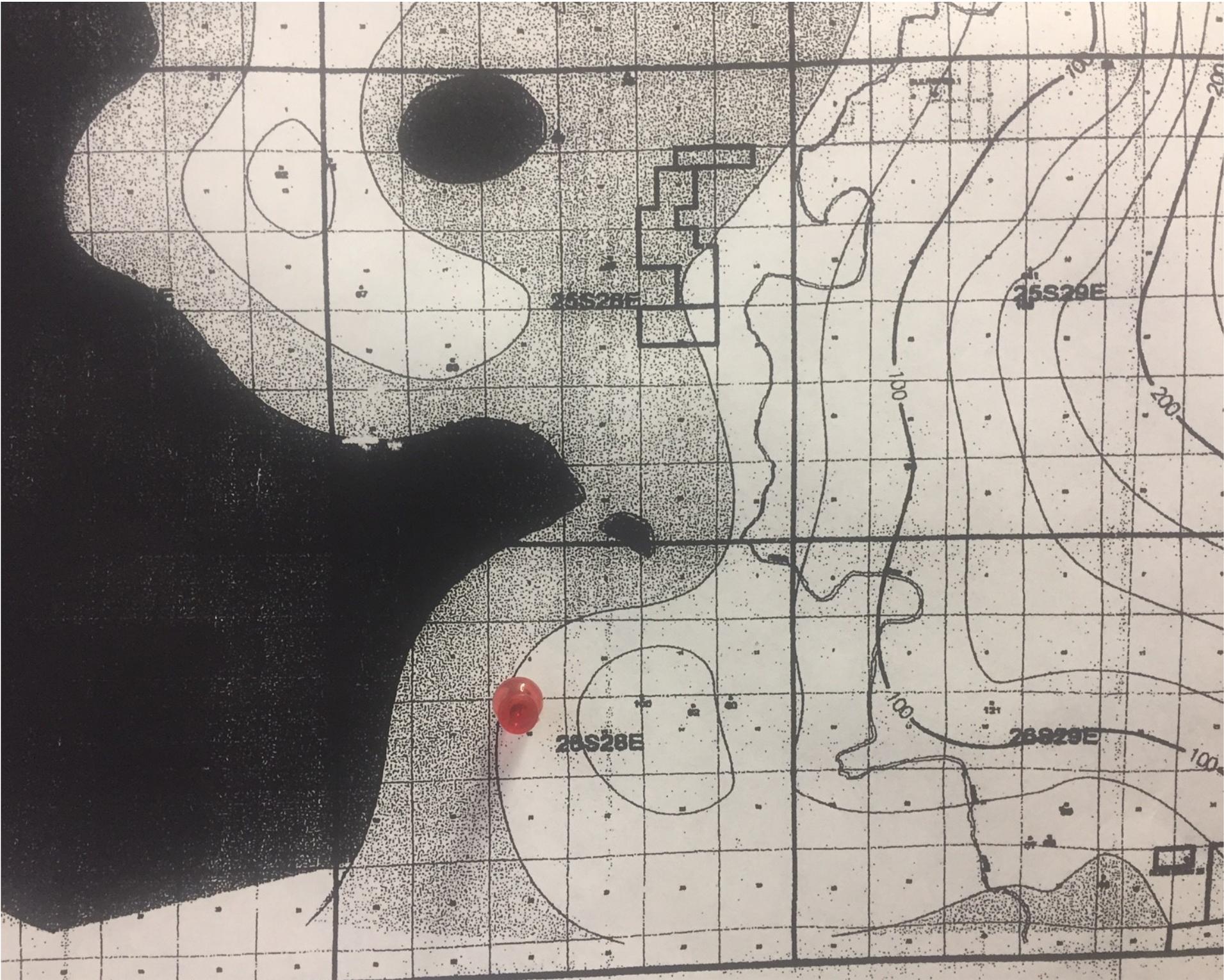
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The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

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9/11/18 8:56 AM

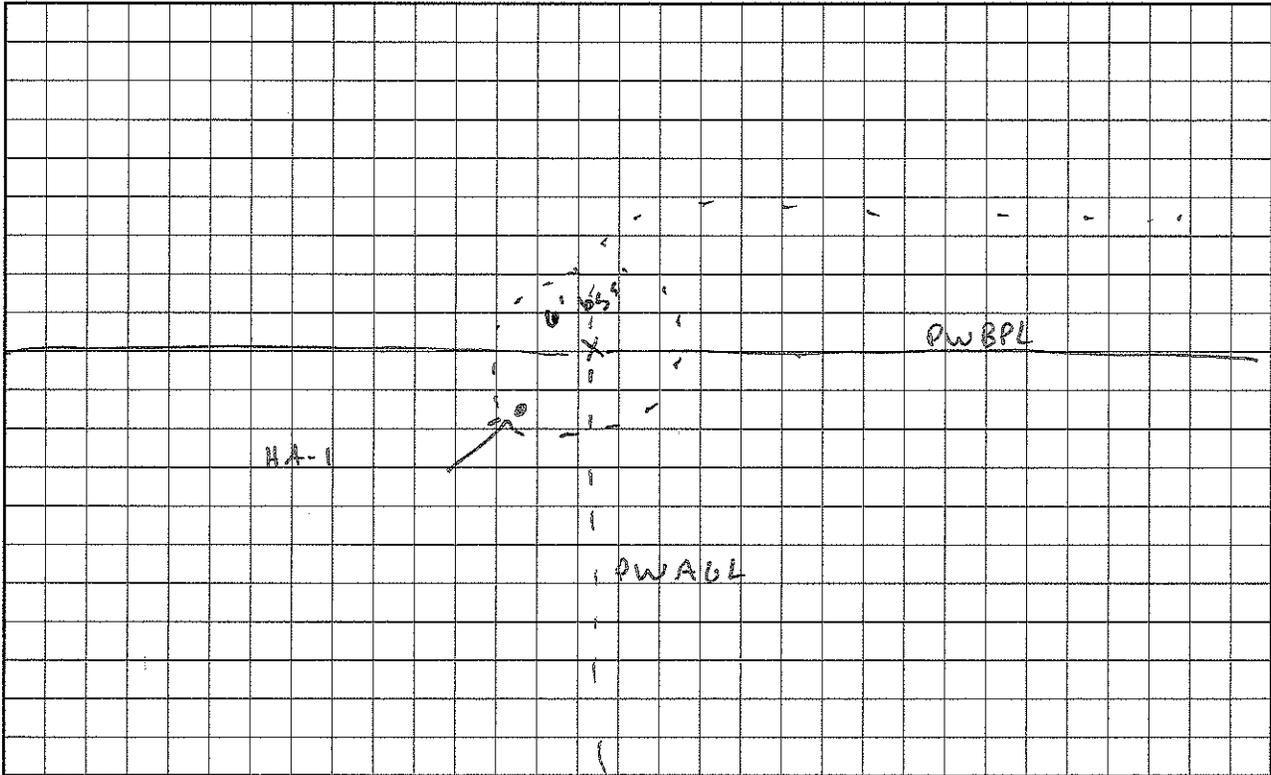
WATER COLUMN/ AVERAGE  
DEPTH TO WATER



Site Name: Graham Cracker 16 State #002H

Date: 6/25/2018

Field Observation Log



ID	Cl-	Odor/PID
HA-106	>2,600	None
HA-108	>2,610	"
HA-109	>2,600	"
GPS:		

ID	Cl-	Odor/PID
GPS:		

ID	Cl-	Odor/PID
GPS:		

ID	Cl-	Odor/PID
GPS:		

ID	Cl-	Odor/PID
GPS:		

ID	Cl-	Odor/PID
GPS:		

ID	Cl-	Odor/PID
GPS:		

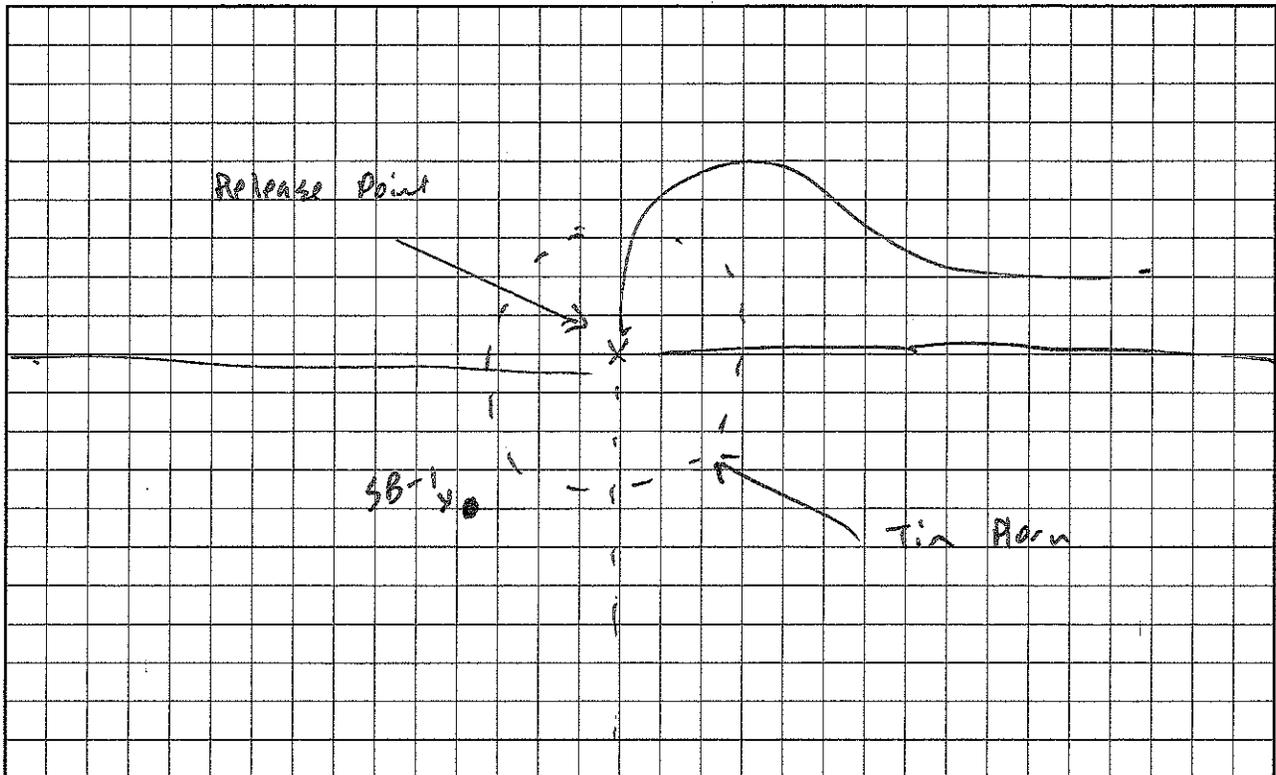
ID	Cl-	Odor/PID
GPS:		

ID	Cl-	Odor/PID
GPS:		

Site Name: Graham Cracker 16 State #002H

Date: 8/17/2018

Field Observation Log



ID	Cl-	Odor/PID
SB-106'	21,500	None
SB-107'	4,910	"
SB-108'	146	"
GPS:		

ID	Cl-	Odor/PID
GPS:		

ID	Cl-	Odor/PID
GPS:		

ID	Cl-	Odor/PID
GPS:		

ID	Cl-	Odor/PID
GPS:		

ID	Cl-	Odor/PID
GPS:		

ID	Cl-	Odor/PID
GPS:		

ID	Cl-	Odor/PID
GPS:		

ID	Cl-	Odor/PID
GPS:		

# Analytical Report 596452

for  
**TRC Solutions, Inc**

**Project Manager: Joel Lowry**

**Graham Cracker 16 2-H**

**27-AUG-18**

Collected By: Client



**1211 W. Florida Ave, Midland TX 79701**

Xenco-Houston (EPA Lab Code: TX00122):  
Texas (T104704215-18-27), Arizona (AZ0765), Florida (E871002-24), Louisiana (03054)  
Oklahoma (2017-142)

Xenco-Dallas (EPA Lab Code: TX01468):  
Texas (T104704295-18-17), Arizona (AZ0809), Arkansas (17-063-0)

Xenco-El Paso (EPA Lab Code: TX00127): Texas (T104704221-18-13)  
Xenco-Lubbock (EPA Lab Code: TX00139): Texas (T104704219-18-17)  
Xenco-Midland (EPA Lab Code: TX00158): Texas (T104704400-18-16)  
Xenco-San Antonio (EPA Lab Code: TNI02385): Texas (T104704534-18-4)  
Xenco Phoenix (EPA Lab Code: AZ00901): Arizona (AZ0757)  
Xenco-Phoenix Mobile (EPA Lab Code: AZ00901): Arizona (AZM757)  
Xenco-Atlanta (LELAP Lab ID #04176)  
Xenco-Tampa: Florida (E87429)  
Xenco-Lakeland: Florida (E84098)



27-AUG-18

Project Manager: **Joel Lowry**  
**TRC Solutions, Inc**  
2057 Commerce  
Midland, TX 79703

Reference: XENCO Report No(s): **596452**  
**Graham Cracker 16 2-H**  
Project Address: Eddy Co., NM

**Joel Lowry:**

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the XENCO Report Number(s) 596452. All results being reported under this Report Number apply to the samples analyzed and properly identified with a Laboratory ID number. Subcontracted analyses are identified in this report with either the NELAC certification number of the subcontract lab in the analyst ID field, or the complete subcontracted report attached to this report.

Unless otherwise noted in a Case Narrative, all data reported in this Analytical Report are in compliance with NELAC standards. The uncertainty of measurement associated with the results of analysis reported is available upon request. Should insufficient sample be provided to the laboratory to meet the method and NELAC Matrix Duplicate and Matrix Spike requirements, then the data will be analyzed, evaluated and reported using all other available quality control measures.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by XENCO Laboratories. This report will be filed for at least 5 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in Report No. 596452 will be filed for 45 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting XENCO Laboratories to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

**Kelsey Brooks**

Project Manager

*Recipient of the Prestigious Small Business Administration Award of Excellence in 1994.*

*Certified and approved by numerous States and Agencies.*

*A Small Business and Minority Status Company that delivers SERVICE and QUALITY*

Houston - Dallas - Midland - San Antonio - Phoenix - Oklahoma - Latin America



# Sample Cross Reference 596452



TRC Solutions, Inc, Midland, TX

Graham Cracker 16 2-H

Sample Id	Matrix	Date Collected	Sample Depth	Lab Sample Id
SB-1 @ 6'	S	08-17-18 09:00	6 ft	596452-001
SB-1 @ 12'	S	08-17-18 09:15	12 ft	596452-002
SB-1 @ 14'	S	08-17-18 09:30	14 ft	596452-003



## CASE NARRATIVE

*Client Name: TRC Solutions, Inc*

*Project Name: Graham Cracker 16 2-H*

Project ID:  
Work Order Number(s): 596452

Report Date: 27-AUG-18  
Date Received: 08/21/2018

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**Sample receipt non conformances and comments:**

None

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**Sample receipt non conformances and comments per sample:**

None



# Certificate of Analysis Summary 596452

TRC Solutions, Inc, Midland, TX

Project Name: Graham Cracker 16 2-H



**Project Id:**  
**Contact:** Joel Lowry  
**Project Location:** Eddy Co., NM

**Date Received in Lab:** Tue Aug-21-18 10:35 am  
**Report Date:** 27-AUG-18  
**Project Manager:** Kelsey Brooks

<b>Analysis Requested</b>	<b>Lab Id:</b>	596452-001	596452-002	596452-003			
	<b>Field Id:</b>	SB-1 @ 6'	SB-1 @ 12'	SB-1 @ 14'			
	<b>Depth:</b>	6- ft	12- ft	14- ft			
	<b>Matrix:</b>	SOIL	SOIL	SOIL			
	<b>Sampled:</b>	Aug-17-18 09:00	Aug-17-18 09:15	Aug-17-18 09:30			
<b>Chloride by EPA 300</b>	<b>Extracted:</b>	Aug-21-18 17:30	Aug-21-18 17:30	Aug-21-18 17:30			
	<b>Analyzed:</b>	Aug-21-18 22:57	Aug-21-18 23:02	Aug-21-18 23:08			
	<b>Units/RL:</b>	mg/kg RL	mg/kg RL	mg/kg RL			
Chloride		21500 248	4910 49.6	146 5.00			

This analytical report, and the entire data package it represents, has been made for your exclusive and confidential use. The interpretations and results expressed throughout this analytical report represent the best judgment of XENCO Laboratories. XENCO Laboratories assumes no responsibility and makes no warranty to the end use of the data hereby presented. Our liability is limited to the amount invoiced for this work order unless otherwise agreed to in writing.

Houston - Dallas - San Antonio - Atlanta - Tampa - Boca Raton - Latin America - Odessa - Corpus Christi

Kelsey Brooks  
 Project Manager





# BS / BSD Recoveries



**Project Name: Graham Cracker 16 2-H**

**Work Order #: 596452**

**Project ID:**

**Analyst: SCM**

**Date Prepared: 08/21/2018**

**Date Analyzed: 08/21/2018**

**Lab Batch ID: 3060822**

**Sample: 7660857-1-BKS**

**Batch #: 1**

**Matrix: Solid**

**Units: mg/kg**

**BLANK /BLANK SPIKE / BLANK SPIKE DUPLICATE RECOVERY STUDY**

<b>Chloride by EPA 300</b>	<b>Blank Sample Result [A]</b>	<b>Spike Added [B]</b>	<b>Blank Spike Result [C]</b>	<b>Blank Spike %R [D]</b>	<b>Spike Added [E]</b>	<b>Blank Spike Duplicate Result [F]</b>	<b>Blk. Spk Dup. %R [G]</b>	<b>RPD %</b>	<b>Control Limits %R</b>	<b>Control Limits %RPD</b>	<b>Flag</b>
<b>Analytes</b>											
Chloride	<5.00	250	250	100	250	249	100	0	90-110	20	

Relative Percent Difference RPD =  $200 * |(C-F)/(C+F)|$

Blank Spike Recovery [D] =  $100 * (C)/[B]$

Blank Spike Duplicate Recovery [G] =  $100 * (F)/[E]$

All results are based on MDL and Validated for QC Purposes



# Form 3 - MS / MSD Recoveries



**Project Name: Graham Cracker 16 2-H**

**Work Order # :** 596452  
**Lab Batch ID:** 3060822  
**Date Analyzed:** 08/21/2018  
**Reporting Units:** mg/kg

**Project ID:**  
**QC- Sample ID:** 596446-008 S      **Batch #:** 1      **Matrix:** Soil  
**Date Prepared:** 08/21/2018      **Analyst:** SCM

**MATRIX SPIKE / MATRIX SPIKE DUPLICATE RECOVERY STUDY**

Chloride by EPA 300 Analytes	Parent Sample Result [A]	Spike Added [B]	Spiked Sample Result [C]	Spiked Sample %R [D]	Spike Added [E]	Duplicate Spiked Sample Result [F]	Spiked Dup. %R [G]	RPD %	Control Limits %R	Control Limits %RPD	Flag
Chloride	351	250	584	93	250	586	94	0	90-110	20	

**Lab Batch ID:** 3060822      **QC- Sample ID:** 596449-002 S      **Batch #:** 1      **Matrix:** Soil  
**Date Analyzed:** 08/21/2018      **Date Prepared:** 08/21/2018      **Analyst:** SCM  
**Reporting Units:** mg/kg

**MATRIX SPIKE / MATRIX SPIKE DUPLICATE RECOVERY STUDY**

Chloride by EPA 300 Analytes	Parent Sample Result [A]	Spike Added [B]	Spiked Sample Result [C]	Spiked Sample %R [D]	Spike Added [E]	Duplicate Spiked Sample Result [F]	Spiked Dup. %R [G]	RPD %	Control Limits %R	Control Limits %RPD	Flag
Chloride	74.4	248	325	101	248	324	101	0	90-110	20	

Matrix Spike Percent Recovery [D] = 100\*(C-A)/B  
 Relative Percent Difference RPD = 200\*(C-F)/(C+F)

Matrix Spike Duplicate Percent Recovery [G] = 100\*(F-A)/E

ND = Not Detected, J = Present Below Reporting Limit, B = Present in Blank, NR = Not Requested, I = Interference, NA = Not Applicable  
 N = See Narrative, EQL = Estimated Quantitation Limit, NC = Non Calculable - Sample amount is > 4 times the amount spiked.



IN ID: HOBA (575) 392-1000  
\*\* MAIL SERVICES ETC, LLC  
4008 N GRIMES  
HOBBS, NM 88240  
UNITED STATES US

DATE TIME: 20AUG18  
ACTWGT: 13.00 LB MAN  
CAD: 0909328/CAFE3210  
DIMS: 15x11x9 IN  
BILL RECIPIENT

TO XENCO LABORATORIES  
XENCO LABORATORIES  
1211 W FLORIDA AVE  
MIDLAND TX 79701

(432) 563-1800  
INV:  
PO:

REF: DEPT:



FedEx  
Express



J18118042081LV

TUE - 21 AUG 10:30A  
PRIORITY OVERNIGHT

TRK# 6606 3917 6175  
0201

41 MAFA

79701  
TX-US LBB



Part # 156148-434 RFD 08/16

551C1/3305/104C

Client: TRC Solutions, Inc

Date/ Time Received: 08/21/2018 10:35:00 AM

Work Order #: 596452

Acceptable Temperature Range: 0 - 6 degC  
 Air and Metal samples Acceptable Range: Ambient  
 Temperature Measuring device used : R8

Sample Receipt Checklist	Comments
#1 *Temperature of cooler(s)?	.3
#2 *Shipping container in good condition?	Yes
#3 *Samples received on ice?	Yes
#4 *Custody Seals intact on shipping container/ cooler?	N/A
#5 Custody Seals intact on sample bottles?	N/A
#6*Custody Seals Signed and dated?	N/A
#7 *Chain of Custody present?	Yes
#8 Any missing/extra samples?	No
#9 Chain of Custody signed when relinquished/ received?	Yes
#10 Chain of Custody agrees with sample labels/matrix?	Yes
#11 Container label(s) legible and intact?	Yes
#12 Samples in proper container/ bottle?	Yes
#13 Samples properly preserved?	Yes
#14 Sample container(s) intact?	Yes
#15 Sufficient sample amount for indicated test(s)?	Yes
#16 All samples received within hold time?	Yes
#17 Subcontract of sample(s)?	N/A
#18 Water VOC samples have zero headspace?	N/A

**\* Must be completed for after-hours delivery of samples prior to placing in the refrigerator**

Analyst:

PH Device/Lot#:

Checklist completed by: Brianna Teel Date: 08/21/2018  
 Brianna Teel

Checklist reviewed by: Kelsey Brooks Date: 08/21/2018  
 Kelsey Brooks



October 26, 2018

REBECCA HASKELL

COG OPERATING

P. O. BOX 1630

ARTESIA, NM 88210

RE: GRAHAM CRAKER 1B

Enclosed are the results of analyses for samples received by the laboratory on 10/25/18 16:10.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-18-11. 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 "Celey D. Keene".

Celey D. Keene

Lab Director/Quality Manager

**Analytical Results For:**

 COG OPERATING  
 REBECCA HASKELL  
 P. O. BOX 1630  
 ARTESIA NM, 88210  
 Fax To: NONE

 Received: 10/25/2018  
 Reported: 10/26/2018  
 Project Name: GRAHAM CRAKER 1B  
 Project Number: NONE GIVEN  
 Project Location: NOT GIVEN

 Sampling Date: 10/25/2018  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: HA - 1B @ SURFACE (H803062-01)**

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	10/26/2018	ND	1.92	96.0	2.00	3.62		
Toluene*	<0.050	0.050	10/26/2018	ND	1.87	93.7	2.00	5.32		
Ethylbenzene*	<0.050	0.050	10/26/2018	ND	1.93	96.3	2.00	4.63		
Total Xylenes*	<0.150	0.150	10/26/2018	ND	5.53	92.1	6.00	3.87		
Total BTEX	<0.300	0.300	10/26/2018	ND						

Surrogate: 4-Bromofluorobenzene (PID) 113 % 69.8-142

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>368</b>	16.0	10/26/2018	ND	400	100	400	3.92		

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*	<50.0	50.0	10/25/2018	ND	194	96.9	200	1.34			
<b>DRO &gt;C10-C28*</b>	<b>8370</b>	50.0	10/25/2018	ND	207	103	200	2.01			
<b>EXT DRO &gt;C28-C36</b>	<b>1950</b>	50.0	10/25/2018	ND							

Surrogate: 1-Chlorooctane 92.7 % 41-142

Surrogate: 1-Chlorooctadecane 229 % 37.6-147

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:**

 COG OPERATING  
 REBECCA HASKELL  
 P. O. BOX 1630  
 ARTESIA NM, 88210  
 Fax To: NONE

 Received: 10/25/2018  
 Reported: 10/26/2018  
 Project Name: GRAHAM CRAKER 1B  
 Project Number: NONE GIVEN  
 Project Location: NOT GIVEN

 Sampling Date: 10/25/2018  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: HA - 1C @ SURFACE (H803062-02)**

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	10/25/2018	ND	1.92	96.0	2.00	3.62	
Toluene*	<0.050	0.050	10/25/2018	ND	1.87	93.7	2.00	5.32	
Ethylbenzene*	<0.050	0.050	10/25/2018	ND	1.93	96.3	2.00	4.63	
Total Xylenes*	<0.150	0.150	10/25/2018	ND	5.53	92.1	6.00	3.87	
Total BTEX	<0.300	0.300	10/25/2018	ND					

Surrogate: 4-Bromofluorobenzene (PID) 97.5 % 69.8-142

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>1570</b>	16.0	10/26/2018	ND	400	100	400	3.92	

TPH 8015M		mg/kg		Analyzed By: MS						S-04
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10*	<10.0	10.0	10/25/2018	ND	194	96.9	200	1.34		
<b>DRO &gt;C10-C28*</b>	<b>3470</b>	10.0	10/25/2018	ND	207	103	200	2.01		
<b>EXT DRO &gt;C28-C36</b>	<b>780</b>	10.0	10/25/2018	ND						

Surrogate: 1-Chlorooctane 95.8 % 41-142

Surrogate: 1-Chlorooctadecane 155 % 37.6-147

Cardinal Laboratories

\*=Accredited Analyte

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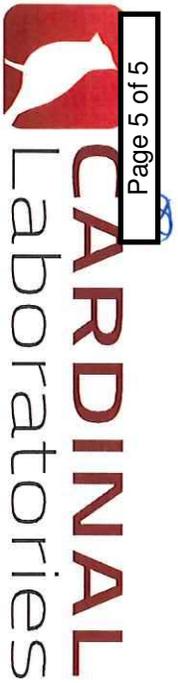


Celey D. Keene, Lab Director/Quality Manager

**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.
- 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





*Rush*

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

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

**BILL TO**

**ANALYSIS REQUEST**

Company Name: *TRC*  
 Project Manager: *Joel Lowrey*  
 Address: *10 West D. Site 150E*  
 City: *Alamogordo* State: *TX* Zip: *79705*  
 Phone #: \_\_\_\_\_ Fax #: \_\_\_\_\_  
 Project #: \_\_\_\_\_ Project Owner: \_\_\_\_\_  
 Project Name: *Gradyman Cooper 15*  
 Project Location: \_\_\_\_\_  
 Sampler Name: *Kyle Schneider*  
 P.O. #: \_\_\_\_\_ Company: *COG*  
 Attn: \_\_\_\_\_ Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Phone #: \_\_\_\_\_  
 Fax #: \_\_\_\_\_

Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX						DATE	TIME	ANALYSIS
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :			
<i>HS03062</i>	<i>1 HA-15 @ 5 yr</i>	<i>3</i>	<i>1</i>	<i>X</i>						<i>10-25-18</i>	<i>11:30</i>	<i>CI</i>
	<i>2 HA-16 @ 5 yr</i>	<i>3</i>	<i>1</i>	<i>X</i>						<i>10-25-18</i>	<i>11:35</i>	<i>TPH</i>
												<i>BTEX</i>

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 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 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: \_\_\_\_\_ Date: *10-25-18*  
 Time: *16:10*  
 Received By: *Jessica Alarcon*  
 Date: \_\_\_\_\_ Time: \_\_\_\_\_  
 Delivered By: (Circle One) \_\_\_\_\_  
 Sampler - UPS - Bus - Other: *4.30 #49*  
 Sample Condition: Cool  Intact   
 Yes  No  Yes  No   
 CHECKED BY: (Initials) *JP*

REMARKS: *How's these bottles. can recorder @ the solution. can be cooler @ the solution. can*

Phone Result:  Yes  No Add'l Phone #: \_\_\_\_\_  
 Fax Result:  Yes  No Add'l Fax #: \_\_\_\_\_



November 15, 2018

ZACH CONDER

TRC

10 DESTA DR. SUITE 150 E

MIDLAND, TX 79705

RE: GRAHAM CRACKER 16 ST #002H

Enclosed are the results of analyses for samples received by the laboratory on 11/14/18 15:00.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-18-11. 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 "Celey D. Keene". The signature is written in a cursive style with a large, flowing "C" and "K".

Celey D. Keene

Lab Director/Quality Manager

**Analytical Results For:**

 TRC  
 ZACH CONDER  
 10 DESTA DR. SUITE 150 E  
 MIDLAND TX, 79705  
 Fax To:

Received:	11/14/2018	Sampling Date:	11/14/2018
Reported:	11/15/2018	Sampling Type:	Soil
Project Name:	GRAHAM CRACKER 16 ST #002H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	COG -EDDY CO NM		

**Sample ID: HA - 1B @ 1' (H803319-01)**

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	11/15/2018	ND	217	108	200	9.14	
DRO >C10-C28*	<10.0	10.0	11/15/2018	ND	220	110	200	7.10	
EXT DRO >C28-C36	<10.0	10.0	11/15/2018	ND					
<hr/>									
Surrogate: 1-Chlorooctane	105 %	41-142							
Surrogate: 1-Chlorooctadecane	97.9 %	37.6-147							

**Sample ID: HA - 1C @ 1' (H803319-04)**

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	11/15/2018	ND	217	108	200	9.14	
DRO >C10-C28*	<10.0	10.0	11/15/2018	ND	220	110	200	7.10	
EXT DRO >C28-C36	<10.0	10.0	11/15/2018	ND					
<hr/>									
Surrogate: 1-Chlorooctane	101 %	41-142							
Surrogate: 1-Chlorooctadecane	92.6 %	37.6-147							

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



---

Celey D. Keene, Lab Director/Quality Manager



Site Name: Graham Cracker 16 St #002#  
Batters

Date: 8-17-18

**Soil Profile**

Description	ft. bgs
	0
	1
	2
	3
	4
	5
Sand / clay	6
	7
	8
	9
	10
	11
Sand / clay	12
	13
Sand / clay	14
	15
	16



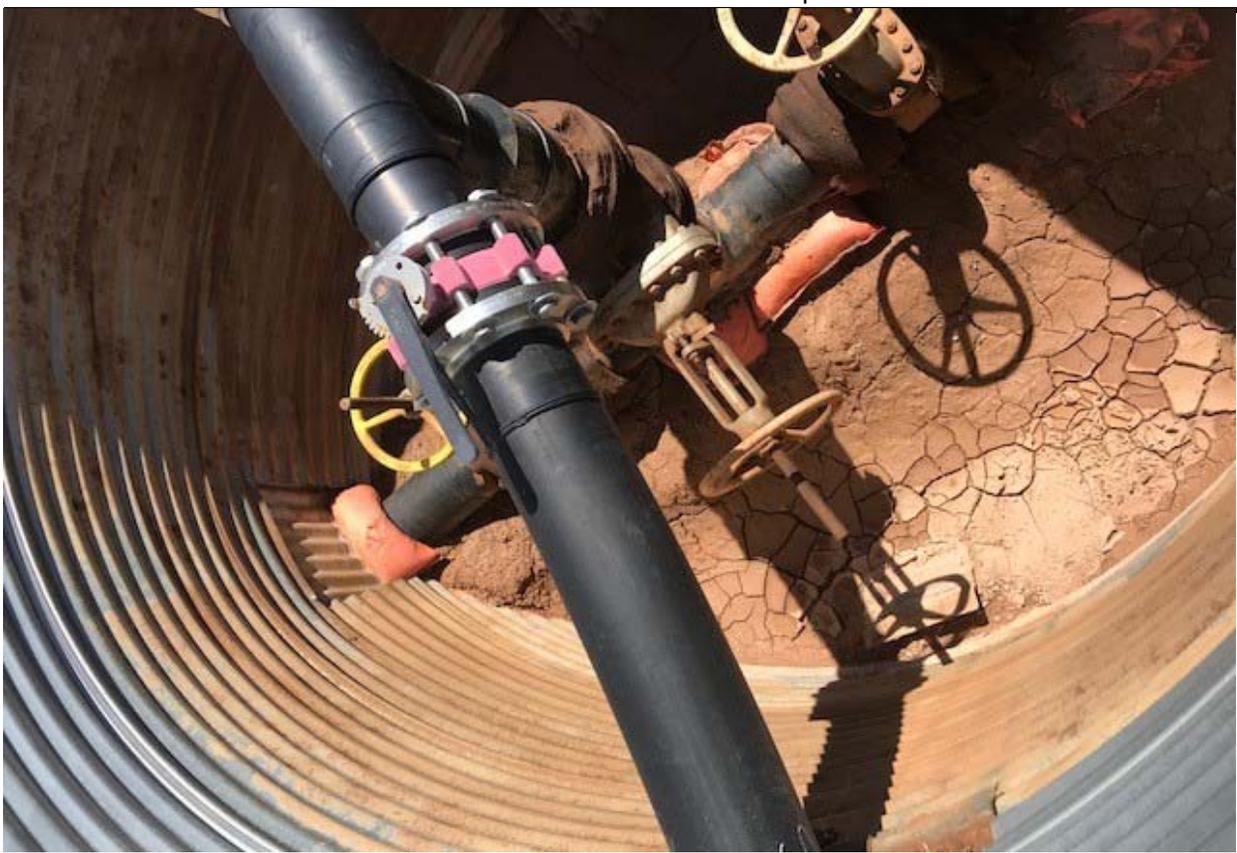
**Photo 1** - Overhead view of the interior of the "tin horn" and sample location.PhotoPhotoPhotoasdf



**Photo 2** - Overhead view of the interior of the "tin horn" and sample location.



**Photo 3** - Overhead view of the interior of the "tin horn" and sample location.



**Photo 4** - Overhead view of the interior of the "tin horn" and sample location. Photo P

Aug 17, 2018 9:25:37 AM



**Photo 5** - View of geoprobing activities.

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

NM OIL CONSERVATION

ARTESIA DISTRICT

MAR 02 2018

Form C-141  
Revised April 3, 2017

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

RECEIVED

**Release Notification and Corrective Action**

*NAB1804438251*

**OPERATOR**

Initial Report  Final Report

Name of Company: <b>COG Operating, LLC (OGRID# 229137)</b>	Contact: <b>Robert McNeill</b>
Address: <b>600 West Illinois Avenue, Midland TX 79701</b>	Telephone No.: <b>432-683-7443</b>
Facility Name: <b>Graham Cracker 16 State #002H</b>	Facility Type: <b>Battery</b>

Surface Owner: <b>State</b>	Mineral Owner: <b>State</b>	API No.: <b>30-015-41533</b>
-----------------------------	-----------------------------	------------------------------

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
N	9	26S	28E					Eddy

Latitude: 32.050129 Longitude: -104.092465 NAD83

**NATURE OF RELEASE**

Type of Release: <b>Produced Water</b>	Volume of Release: <b>25bbls</b>	Volume Recovered: <b>23bbls</b>
Source of Release: <b>Check Valve</b>	Date and Hour of Occurrence: <b>2/24/2018</b>	Date and Hour of Discovery: <b>2/24/2018 2:00pm</b>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <b>Crystal Weaver-NMOCD Tammy Honea-NMSLO</b>	
By Whom? <b>Sheldon Hitchcock</b>	Date and Hour: <b>2/24/2018 10:16pm</b>	
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.\*

A hole formed in a check valve due to internal corrosion. The check valve was replaced.

Describe Area Affected and Cleanup Action Taken.\*

The fluid was contained inside of the "tin horn" surrounding the valve. A vacuum truck was dispatched to recover all freestanding fluids. Concho will have the spill area evaluated for any possible impact from the release and we will present a remediation work plan to the NMOCD for approval prior to any significant remediation activities.

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: *Sheldon Hitchcock*

Approved by Environmental Specialist: *Sheldon Hitchcock*

Printed Name: Sheldon L. Hitchcock

Title: HSE Coordinator

Approval Date: **3/5/18**

Expiration Date: **N/A**

E-mail Address: slhitchcock@concho.com

Conditions of Approval:

*See Attached*

Attached:

**257-4645**

Date: 3/2/2018

Phone: 575-746-2010

\* Attach Additional Sheets If Necessary

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 April 3, 2017

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>COG Operating, LLC (OGRID# 229137)</b>	Contact: <b>Robert McNeill</b>
Address: <b>600 West Illinois Avenue, Midland TX 79701</b>	Telephone No.: <b>432-683-7443</b>
Facility Name: <b>Graham Cracker 16 State #002H</b>	Facility Type: <b>Battery</b>

Surface Owner: State	Mineral Owner: State	API No.: 30-015-41533
----------------------	----------------------	-----------------------

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
N	9	26S	28E					Eddy

Latitude: 32.050129 Longitude: -104.092465 NAD83

**NATURE OF RELEASE**

Type of Release: Produced Water	Volume of Release: 25bbls	Volume Recovered: 23bbls
Source of Release: Check Valve	Date and Hour of Occurrence: 2/24/2018	Date and Hour of Discovery: 2/24/2018 2:00pm
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Crystal Weaver-NMOCD Tammy Honea-NMSLO	
By Whom? Sheldon Hitchcock	Date and Hour: 2/24/2018 10:16pm	
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.\*

A hole formed in a check valve due to internal corrosion. The check valve was replaced.

Describe Area Affected and Cleanup Action Taken.\*

The fluid was contained inside of the "tin horn" surrounding the valve. A vacuum truck was dispatched to recover all freestanding fluids. Concho will have the spill area evaluated for any possible impact from the release and we will present a remediation work plan to the NMOCD for approval prior to any significant remediation activities.

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.

**Final remediation and reclamation will be conducted in accordance with 19.15.29.12 and 19.15.29.12 NMAC, once the site is no longer being used for oil and gas operations. Please reference the Site Assessment Summary and Deferral Request, dated November 1, 2018, for additional details.**

Signature: <i>Sheldon Hitchcock</i>		<u>OIL CONSERVATION DIVISION</u>	
Printed Name: Sheldon L. Hitchcock		Approved by Environmental Specialist:	
Title: HSE Coordinator	Approval Date:	Expiration Date:	
E-mail Address: slhitchcock@concho.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 3/2/2018	Phone: 575-746-2010		

\* Attach Additional Sheets If Necessary