



April 21, 2021

Oil Conservation Division, District 1
1625 N. French Dr.
Hobbs, NM

**Re: Work Plan
Dodd Federal Unit #980H (3/23/19)
RP#: 2RP-5334
Incident # NAB1909540096
GPS: 32.85542, -104.06603
Unit Letter C, Section 10, Township 17 South, Range 29 East
Eddy County, New Mexico**

To Whom It May Concern,

COG Operating, LLC (COG) is pleased to submit the following work plan in response to a release that occurred at the Dodd Federal Unit #980H located in Unit Letter C, Section 10, Township 17 South and Range 29 East in Lea County, New Mexico.

BACKGROUND

The release was discovered on March 23, 2019 and a C-141 initial report was submitted and approved by the New Mexico Oil Conservation Division (NMOCD). The release was caused by a dump on the FWKO losing pressure, filling the vessel and sending fluid up to the flare. Approximately 1 barrels of oil and 5 barrels of produced water were released and recovered 0.5 barrels of crude oil and 3 barrels of water. The initial C-141 is shown in Appendix A. As discussed, the Dodd facility is now operated by Spur Energy Partners LLC.

GROUNDWATER AND REGULATORY

According to the New Mexico Office of the State Engineer (NMOSE), a water well is in Section 22, with groundwater reported depth of 76' below surface (2012). The water well is located approximately 2.5 miles south of the site. The water well information is shown in Appendix B.

On December 7, 2020, COG installed a Depth to Water (DTW) borehole to a depth of 55' below surface. The borehole was left open for 72 hours prior to checking for presence of groundwater. No shallow groundwater was encountered and the borehole was plugged by the licensed driller.

A risk based evaluation and site determinations were performed in accordance to the New Mexico Oil Conservation Division (NMOCD) Rule (Title 19 Chapter 15 Part 29) for releases on oil and gas development and production facilities in New Mexico (effective August 14, 2018). According to the site characterization evaluation, no other receptors (water wells, playas, water course, lake beds or ordinance boundaries) were located within each specific boundaries or distance from the site. However, the area is in a high Karst area.

The groundwater data and the site characterization evaluation data is summarized in Appendix B. The delineation and closure criteria are listed below:

General Site Characterization and Groundwater:

Site Characterization	Average Groundwater Depth (ft.)
High Karst	>50 feet

Delineation and Closure Criteria:

Remedial Action Levels (RALs)	
Chlorides	600 mg/kg
TPH (GRO and DRO and MRO)	100 mg/kg
TPH (GRO and DRO)	-
Benzene	10 mg/kg
Total BTEX	50 mg/kg

INITIAL SAMPLING

After excavating the impacted area, a total of four (4) composite samples were collected from the area in September 24, 2019. The sample locations are shown in Figure 1. Referring to Table 1, all the samples were below the Table 1 Closure Criteria concentrations for TPH and BTEX. However, the areas of B-1 and B-4 exceeded the closure criteria concentrations for chlorides at 2.0' below surface, with chloride concentrations of 1,650 mg/kg and 2,800 mg/kg, respectively. These areas were not vertically defined. The areas of B-2 and B-3 were all below the Table 1 Closure Criteria concentrations for chlorides.

COG submitted a work plan to excavate the impacted areas, dated May 18, 2020. COG had proposed excavation of the impacted soil in the areas of B-1 and B-4. However, if deeper impact was encountered, a liner variance was requested for the impacted area of B-1 and B-4 due to safety concerns. The NMOCD denied the Variance request to install the liner.

ADDITIONAL ASSESSMENT

On December 7, 2020, COG installed a borehole (BH-1) between B-1 and B-4 to define the extents of the chloride impact. The borehole location is shown in Figure 2. Referring to Table 1, the chlorides were vertically defined at 45' below surface. Based on the results, it appears that the deeper impact may not be related to the flare release incident and may be historical or other possible sources near the area. The impacted area measures approximately 8'x 30' and appears to be limited and confined inside the flare firewalls.

In addition, a Depth to Water (DTW) borehole was installed to a depth of 55' below surface. The borehole was left open for 72 hours prior to checking for presence of groundwater. No shallow groundwater was encountered and the borehole was plugged by the licensed driller. According to New Mexico Office of the State Engineer (NMOSE), a water well is in Section 22, with groundwater depth of 76' below surface. The water well is located approximately 2.5 mile south of the site. The surface elevation at the water well is approximately 3550' and 3595' at the Dodd location. Based on relative elevation, the depth to water at the site is estimated to be around 120' below surface.

DEFERRAL REPORT SUBMITAL

Based on the findings, COG submitted the deferral report to the NMOCD for approval, dated December 22, 2020. On March 11, 2021, the NMOCD denied the deferment Report. COG contacted NMOCD to discuss the denial and possible historical impact from a plugged location east of the flare. As shown on Figure 3 (2016 Aerial), a plugged well is located east of the flare.

PROPOSED WORK PLAN

Based on our conversation, the NMOCD requested COG to submit a work plan to continue the assessment at the site to define the horizontal extents of the impact around the flare. The proposed work plan is shown below.

- Boreholes will be installed in the area north, south, west and east of the flare to define the extents of the impacted soil. If needed, additional boreholes will be installed to define the extents. The proposed boreholes are shown in the attached Figure 2.
- According to published data and relative elevation, the groundwater at the site appears to be greater than 100 feet below surface. COG will install a deeper borehole to a depth of 105' below surface to establish the Depth to Water (DTW) for the area.

SITE RECLAMATION AND RESTORATION

- All fluids remained on the pad and no reclamation at the site is required.

REMEDIATION PLAN

As discussed, the Dodd facility is now operated by Spur Energy Partners LLC. Once the proposed activities are completed, COG will prepare a remediation plan for the site.

Should you have any questions or concerns on the closure report, please do not hesitate to contact me.

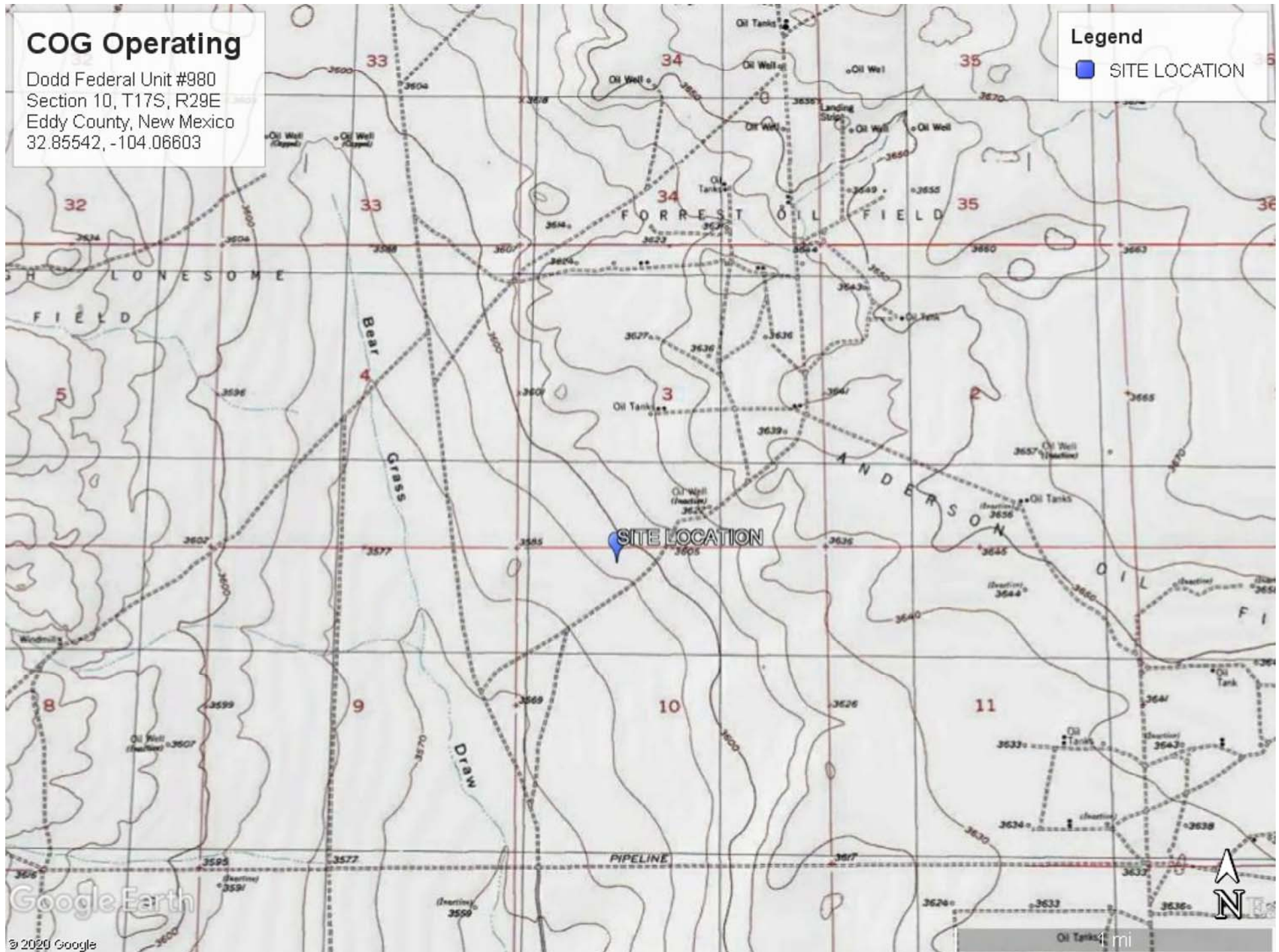
Sincerely,
ConocoPhillips



Ike Tavarez, P. G.
Supervisor, Permian Environmental Operations
ike.tavarez@conocophillips.com

CC:

Figures



COG Operating

Figure 1
Dodd Federal Unit 980
Section 10, T17S, R29E
Eddy Count, New Mexico
32.85542, -104.06603

- BH-1
- ⊙ Sample Points

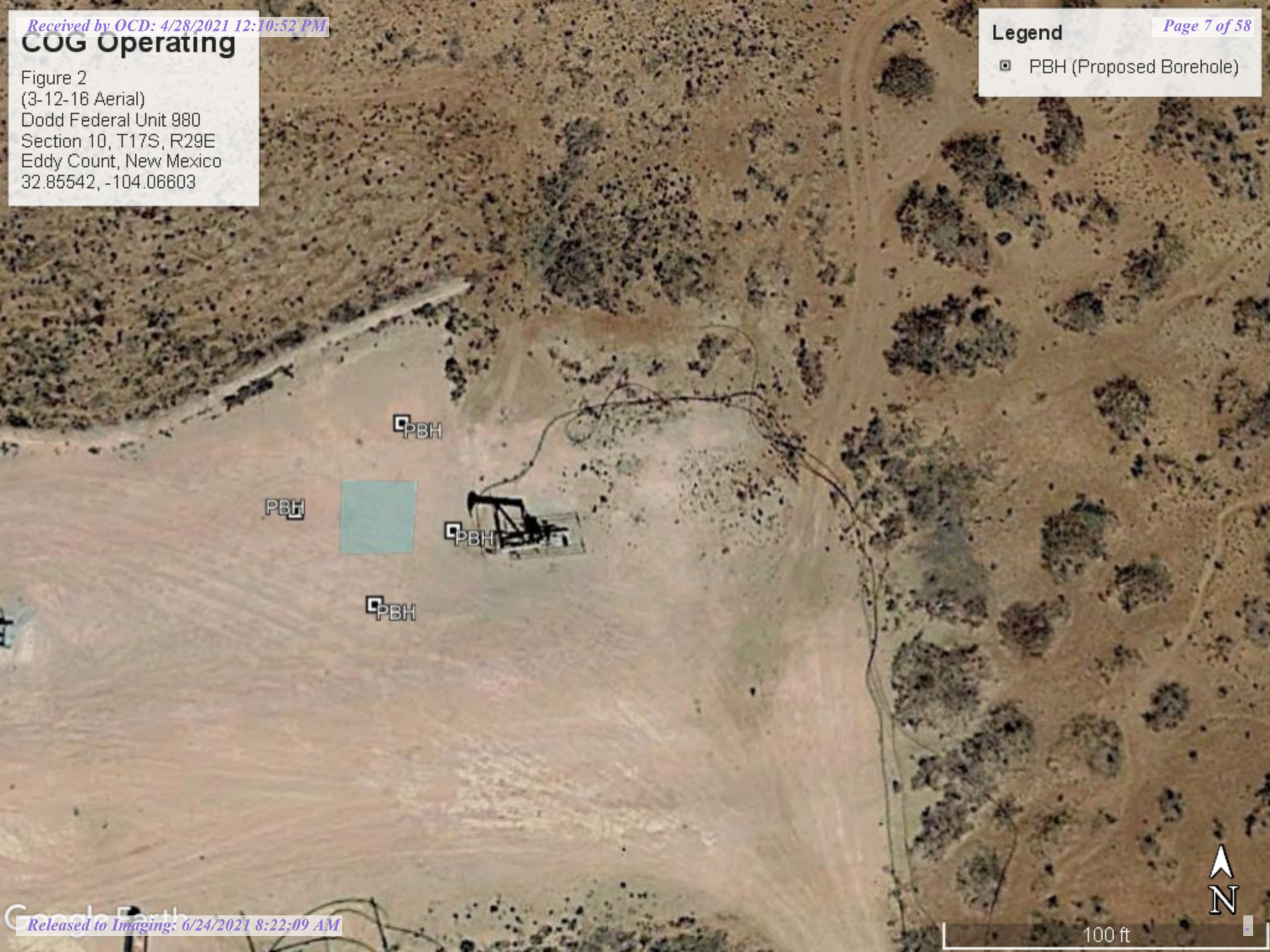


COG Operating

Figure 2
(3-12-18 Aerial)
Dodd Federal Unit 980
Section 10, T17S, R29E
Eddy Count, New Mexico
32.85542, -104.06603

Legend

PBH (Proposed Borehole)



N

100 ft

COG Operating

Figure 3
Proposed Boreholes
Dodd Federal Unit 980
Section 10, T17S, R29E
Eddy Count, New Mexico
32.85542, -104.06603

Legend

▣ PBH (Proposed Borehole)



Tables

Table 1
COG Operating LLC
Dodd Federal Unit #980H
Eddy County, New Mexico

Sample ID	Sample Date	Sample Depth (ft)	Soil Status		TPH (mg/kg)				Benzene (mg/kg)	Total BTEX (mg/kg)	Chloride (mg/kg)
			In-Situ	Removed	GRO	DRO	MRO	Total			
NMOCD Remediation Action Limits (mg/kg)					-	-	-	100	10	50	600
BH-1	12/7/2020	1	X		-	-	-	-	-	-	669
BH-1	12/7/2020	3	X		-	-	-	-	-	-	539
BH-1	12/7/2020	5	X		-	-	-	-	-	-	1500
BH-1	12/7/2020	7	X		-	-	-	-	-	-	5490
BH-1	12/7/2020	10	X		-	-	-	-	-	-	4100
BH-1	12/7/2020	15	X		-	-	-	-	-	-	7670
BH-1	12/7/2020	20	X		-	-	-	-	-	-	6800
BH-1	12/7/2020	25	X		-	-	-	-	-	-	4730
BH-1	12/7/2020	30	X		-	-	-	-	-	-	5030
BH-1	12/7/2020	35	X		-	-	-	-	-	-	2630
BH-1	12/7/2020	40	X		-	-	-	-	-	-	798
BH-1	12/7/2020	45	X		-	-	-	-	-	-	40.7
Bottom -1	9/24/2019	2	X		<10.0	<10.0	<10.0	<10.0	<0.05	<0.05	1650
Bottom -2	9/24/2019	1	X		<10.0	<10.0	<10.0	<10.0	<0.05	<0.05	496
Bottom -3	9/24/2019	1	X		<10.0	<10.0	<10.0	<10.0	<0.05	<0.05	176
Bottom -4	9/24/2019	2	X		<10.0	<10.0	<10.0	<10.0	<0.05	<0.05	2800
North	9/24/2019	0-1	X		<10.0	<10.0	<10.0	<10.0	<0.05	<0.05	480
South	9/24/2019	0-1	X		<10.0	<10.0	<10.0	<10.0	<0.05	<0.05	320
East	9/24/2019	0-1	X		<10.0	<10.0	<10.0	<10.0	<0.05	<0.05	240
West	9/24/2019	0-1	X		<10.0	<10.0	<10.0	<10.0	<0.05	<0.05	192

(-)

Not Analyzed

Appendix A

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 Department

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party	OGRID
Contact Name	Contact Telephone
Contact email	Incident # (assigned by OCD)
Contact mailing address	

Location of Release Source

Latitude _____ Longitude _____
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	Site Type
Date Release Discovered	API# (if applicable)

Unit Letter	Section	Township	Range	County

Surface Owner: ☐ State ☐ Federal ☐ Tribal ☐ Private (Name: _____)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)
Cause of Release		

Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? <input type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?	

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

<input type="checkbox"/> The source of the release has been stopped.	
<input type="checkbox"/> The impacted area has been secured to protect human health and the environment.	
<input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.	
<input type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why:	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.	
Printed Name: _____	Title: _____
Signature: <u>Delann Opreant</u>	Date: _____
email: _____	Telephone: _____
<u>OCD Only</u>	
Received by: _____	Date: _____

Incident ID	
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	_____ (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did the release impact areas not on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

Characterization Report Checklist: *Each of the following items must be included in the report.*

- ☐ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☐ Field data
- ☐ Data table of soil contaminant concentration data
- ☐ Depth to water determination
- ☐ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- ☐ Boring or excavation logs
- ☐ Photographs including date and GIS information
- ☐ Topographic/Aerial maps
- ☐ Laboratory data including chain of custody


If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

Oil Conservation Division

Incident ID	
District RP	2RP 5334
Facility ID	
Application ID	

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.

Printed Name: Ike Tavaréz Title: Senior HSE Supervisor

Signature:  Date: 5/18/20

email: itavarez@concho.com Telephone: 432-683-7443

OCD Only

Received by: _____ Date: _____

Appendix B

Water Well Data
Average Depth to Groundwater (ft)
COG -Dodd Federal Unit #980H

16 South			28 East		
6	5	4	3	2	1
7	8	9	10	11	12
18	17	16	15	14	13
19	20	21	22	23	24
30	29	28	27	26	25
31	32	33	34	35	36

16 South			29 East		
6	5	4	3	2	1
7	8	9	10	11	12
18	17	16	15	14 220	13
19	20	21	22	23	24
30	29	28	27	26	25
31	32	33	34	35	36

16 South			30 East		
6	5	4	3	2	1
7	8	9	10	11	12
18	17	16	15	14	13
19	20	21	22	23	24
30	29	28	27	26	25
31	32	33	34	35	36

17 South			28 East		
6	5	4	3	2 28	1
7	8	9	10	11	12
18	17	16	15	14	13
19	20	21	22 45	23	24
30	29	28	27	26	25
31	32	33	34	35	36

17 South			29 East		
6	5	4	3	2	1
7	8	9	10	11	12
18	17	16	15	14	13
19	20	21	22 76	23	24
30	29 210	28	27	26	25
31	32	33	34	35	36

17 South			30 East		
6	5	4	3	2	1
7	8	9	10	11	12
18	17	16	15	14	13
19	20 80	21	22	23	24
30	29	28	27	26	25
31	32	33	34	35	36

18 South			28 East		
6	5	4	3	2 55	1
7	8 81	9	10	11	12
18	17	16	15 80	14	13
19	20	21	22	23	24
30	29	28	27	26	25
31	32	33	34	35	36

18 South			29 East		
6	5	4	3	2	1
7	8	9	10 95	11	12
18	17	16	15	14	13
19	20	21	22	23	24
30	29	28	27	26	25
31	32	33	34	35	36

18 South			30 East		
6	5	4	3	2	1
7	8	9	10	11	12
18	17	16	15	14	13
19	20	21	22	23 44	24
30	29	28	27	26	25
31	32	33	34	35	36

- 88 New Mexico State Engineers Well Reports
 105 USGS Well Reports
 90 Geology and Groundwater Conditions in Southern Lea, County, NM (Report 6)
 Geology and Groundwater Resources of Eddy County, NM (Report 3)
 34 NMOCD - Groundwater Data



New Mexico Office of the State Engineer

Water Column/Average Depth to Water

(A CLW##### in the
POD suffix indicates the
POD has been replaced
& no longer serves a
water right file.)

(R=POD has been
replaced,
O=orphaned,
C=the file is
closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest)

(NAD83 UTM in meters)

(In feet)

POD Number	Code	POD Sub-basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	DepthWell	DepthWater	Water Column	
RA 11807 POD1		RA	ED	1	2	3	22	17S	29E	587360	3631585	<input type="text"/>	131	76	55

Average Depth to Water: **76 feet**

Minimum Depth: **76 feet**

Maximum Depth: **76 feet**

Record Count: 1

PLSS Search:

Township: 17S **Range:** 29E

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.

5/18/20 2:28 PM

WATER COLUMN/ AVERAGE DEPTH TO
WATER



COG Operating

Dodd Federal Unit #980
Section 10, T17S, R29E
Eddy County, New Mexico
32.85542, -104.06603

Legend

High

Low

Medium

SITE LOCATION

SITE LOCATION

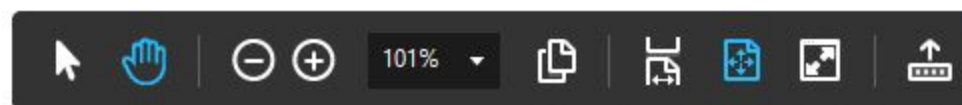
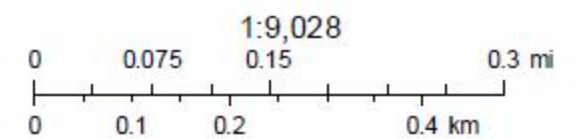


2 mi

New Mexico NFHL Data



May 18, 2020



MA
Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus

is made possible through a collaboration with NMDHSEM, EDAC, and FEMA

This is a non-regulatory product for informational use only. Please consult your local floodplain administrator for further information.

Appendix C



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

September 26, 2019

DAKOTA NEEL

COG OPERATING

P. O. BOX 1630

ARTESIA, NM 88210

RE: DODD FEDERAL #980

Enclosed are the results of analyses for samples received by the laboratory on 09/25/19 12:45.

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.

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, flowing style.

Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

COG OPERATING
 DAKOTA NEEL
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

Received: 09/25/2019
 Reported: 09/26/2019
 Project Name: DODD FEDERAL #980
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 09/24/2019
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: BTM - 1 (H903295-01)

BTEx 8021B		mg/kg		Analyzed By: BF						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/26/2019	ND	1.70	85.0	2.00	0.372		
Toluene*	<0.050	0.050	09/26/2019	ND	1.71	85.5	2.00	1.89		
Ethylbenzene*	<0.050	0.050	09/26/2019	ND	1.68	84.1	2.00	1.52		
Total Xylenes*	<0.150	0.150	09/26/2019	ND	4.97	82.9	6.00	1.85		
Total BTEX	<0.300	0.300	09/26/2019	ND						

Surrogate: 4-Bromofluorobenzene (PID) 84.1 % 73.3-129

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	1650	16.0	09/26/2019	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	09/25/2019	ND	197	98.5	200	1.16	
DRO >C10-C28*	<10.0	10.0	09/25/2019	ND	196	98.1	200	1.65	
EXT DRO >C28-C36	<10.0	10.0	09/25/2019	ND					

Surrogate: 1-Chlorooctane 87.8 % 41-142

Surrogate: 1-Chlorooctadecane 90.1 % 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



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

Analytical Results For:

COG OPERATING
 DAKOTA NEEL
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

Received: 09/25/2019
 Reported: 09/26/2019
 Project Name: DODD FEDERAL #980
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 09/24/2019
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: BTM - 2 (H903295-02)

BTEx 8021B		mg/kg		Analyzed By: BF						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/26/2019	ND	1.70	85.0	2.00	0.372		
Toluene*	<0.050	0.050	09/26/2019	ND	1.71	85.5	2.00	1.89		
Ethylbenzene*	<0.050	0.050	09/26/2019	ND	1.68	84.1	2.00	1.52		
Total Xylenes*	<0.150	0.150	09/26/2019	ND	4.97	82.9	6.00	1.85		
Total BTEX	<0.300	0.300	09/26/2019	ND						

Surrogate: 4-Bromofluorobenzene (PID) 84.7 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	496	16.0	09/26/2019	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	09/25/2019	ND	197	98.5	200	1.16	
DRO >C10-C28*	<10.0	10.0	09/25/2019	ND	196	98.1	200	1.65	
EXT DRO >C28-C36	<10.0	10.0	09/25/2019	ND					

Surrogate: 1-Chlorooctane 91.0 % 41-142

Surrogate: 1-Chlorooctadecane 93.9 % 37.6-147

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

COG OPERATING
 DAKOTA NEEL
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

Received: 09/25/2019
 Reported: 09/26/2019
 Project Name: DODD FEDERAL #980
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 09/24/2019
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: BTM - 3 (H903295-03)

BTEx 8021B		mg/kg		Analyzed By: BF						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/26/2019	ND	1.70	85.0	2.00	0.372		
Toluene*	<0.050	0.050	09/26/2019	ND	1.71	85.5	2.00	1.89		
Ethylbenzene*	<0.050	0.050	09/26/2019	ND	1.68	84.1	2.00	1.52		
Total Xylenes*	<0.150	0.150	09/26/2019	ND	4.97	82.9	6.00	1.85		
Total BTEX	<0.300	0.300	09/26/2019	ND						

Surrogate: 4-Bromofluorobenzene (PID) 86.5 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	176	16.0	09/26/2019	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	09/25/2019	ND	197	98.5	200	1.16	
DRO >C10-C28*	<10.0	10.0	09/25/2019	ND	196	98.1	200	1.65	
EXT DRO >C28-C36	<10.0	10.0	09/25/2019	ND					

Surrogate: 1-Chlorooctane 94.2 % 41-142

Surrogate: 1-Chlorooctadecane 97.1 % 37.6-147

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

COG OPERATING
 DAKOTA NEEL
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

Received: 09/25/2019
 Reported: 09/26/2019
 Project Name: DODD FEDERAL #980
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 09/24/2019
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: BTM - 4 (H903295-04)

BTEx 8021B		mg/kg		Analyzed By: BF						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/26/2019	ND	1.70	85.0	2.00	0.372		
Toluene*	<0.050	0.050	09/26/2019	ND	1.71	85.5	2.00	1.89		
Ethylbenzene*	<0.050	0.050	09/26/2019	ND	1.68	84.1	2.00	1.52		
Total Xylenes*	<0.150	0.150	09/26/2019	ND	4.97	82.9	6.00	1.85		
Total BTEX	<0.300	0.300	09/26/2019	ND						

Surrogate: 4-Bromofluorobenzene (PID) 86.9 % 73.3-129

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	2800	16.0	09/26/2019	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	09/25/2019	ND	197	98.5	200	1.16	
DRO >C10-C28*	<10.0	10.0	09/25/2019	ND	196	98.1	200	1.65	
EXT DRO >C28-C36	<10.0	10.0	09/25/2019	ND					

Surrogate: 1-Chlorooctane 90.8 % 41-142

Surrogate: 1-Chlorooctadecane 93.8 % 37.6-147

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

COG OPERATING
 DAKOTA NEEL
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

Received: 09/25/2019
 Reported: 09/26/2019
 Project Name: DODD FEDERAL #980
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 09/24/2019
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: NORTH (H903295-05)

BTX 8021B		mg/kg		Analyzed By: BF						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/26/2019	ND	1.70	85.0	2.00	0.372		
Toluene*	<0.050	0.050	09/26/2019	ND	1.71	85.5	2.00	1.89		
Ethylbenzene*	<0.050	0.050	09/26/2019	ND	1.68	84.1	2.00	1.52		
Total Xylenes*	<0.150	0.150	09/26/2019	ND	4.97	82.9	6.00	1.85		
Total BTX	<0.300	0.300	09/26/2019	ND						

Surrogate: 4-Bromofluorobenzene (PID) 81.6 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	480	16.0	09/26/2019	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	09/25/2019	ND	197	98.5	200	1.16	
DRO >C10-C28*	<10.0	10.0	09/25/2019	ND	196	98.1	200	1.65	
EXT DRO >C28-C36	<10.0	10.0	09/25/2019	ND					

Surrogate: 1-Chlorooctane 83.0 % 41-142

Surrogate: 1-Chlorooctadecane 85.2 % 37.6-147

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

COG OPERATING
 DAKOTA NEEL
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

Received: 09/25/2019
 Reported: 09/26/2019
 Project Name: DODD FEDERAL #980
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 09/24/2019
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: SOUTH (H903295-06)

BTX 8021B		mg/kg		Analyzed By: BF					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/26/2019	ND	1.70	85.0	2.00	0.372	
Toluene*	<0.050	0.050	09/26/2019	ND	1.71	85.5	2.00	1.89	
Ethylbenzene*	<0.050	0.050	09/26/2019	ND	1.68	84.1	2.00	1.52	
Total Xylenes*	<0.150	0.150	09/26/2019	ND	4.97	82.9	6.00	1.85	
Total BTX	<0.300	0.300	09/26/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 83.9 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	320	16.0	09/26/2019	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	09/25/2019	ND	197	98.5	200	1.16	
DRO >C10-C28*	<10.0	10.0	09/25/2019	ND	196	98.1	200	1.65	
EXT DRO >C28-C36	<10.0	10.0	09/25/2019	ND					

Surrogate: 1-Chlorooctane 68.9 % 41-142

Surrogate: 1-Chlorooctadecane 70.6 % 37.6-147

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Analytical Results For:

COG OPERATING
 DAKOTA NEEL
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

Received: 09/25/2019
 Reported: 09/26/2019
 Project Name: DODD FEDERAL #980
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 09/24/2019
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: EAST (H903295-07)

BTX 8021B		mg/kg		Analyzed By: BF					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/26/2019	ND	1.70	85.0	2.00	0.372	
Toluene*	<0.050	0.050	09/26/2019	ND	1.71	85.5	2.00	1.89	
Ethylbenzene*	<0.050	0.050	09/26/2019	ND	1.68	84.1	2.00	1.52	
Total Xylenes*	<0.150	0.150	09/26/2019	ND	4.97	82.9	6.00	1.85	
Total BTX	<0.300	0.300	09/26/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 84.7 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	240	16.0	09/26/2019	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	09/25/2019	ND	197	98.5	200	1.16	
DRO >C10-C28*	<10.0	10.0	09/25/2019	ND	196	98.1	200	1.65	
EXT DRO >C28-C36	<10.0	10.0	09/25/2019	ND					

Surrogate: 1-Chlorooctane 91.2 % 41-142

Surrogate: 1-Chlorooctadecane 93.7 % 37.6-147

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Analytical Results For:

COG OPERATING
 DAKOTA NEEL
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

Received: 09/25/2019
 Reported: 09/26/2019
 Project Name: DODD FEDERAL #980
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 09/24/2019
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: WEST (H903295-08)

BTX 8021B		mg/kg		Analyzed By: BF					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/26/2019	ND	1.70	85.0	2.00	0.372	
Toluene*	<0.050	0.050	09/26/2019	ND	1.71	85.5	2.00	1.89	
Ethylbenzene*	<0.050	0.050	09/26/2019	ND	1.68	84.1	2.00	1.52	
Total Xylenes*	<0.150	0.150	09/26/2019	ND	4.97	82.9	6.00	1.85	
Total BTX	<0.300	0.300	09/26/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 84.6 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	192	16.0	09/26/2019	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	09/25/2019	ND	197	98.5	200	1.16	
DRO >C10-C28*	<10.0	10.0	09/25/2019	ND	196	98.1	200	1.65	
EXT DRO >C28-C36	<10.0	10.0	09/25/2019	ND					

Surrogate: 1-Chlorooctane 94.6 % 41-142

Surrogate: 1-Chlorooctadecane 96.9 % 37.6-147

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Celey D. Keene, Lab Director/Quality Manager



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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

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A handwritten signature in black ink, appearing to read "Celey D. Keene".

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

[illegible]

Certificate of Analysis Summary 680980

COG Operating LLC, Artesia, NM

Project Name: Dodd Fed 980

Project Id:

Date Received in Lab: Mon 12.14.2020 14:12

Contact: Sheldon Hitchcock

Report Date: 12.15.2020 11:49

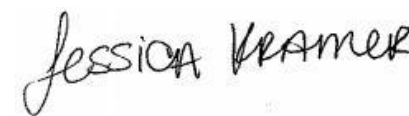
Project Location: Eddy County, New Mexico

Project Manager: Jessica Kramer

<i>Analysis Requested</i>	<i>Lab Id:</i>	680980-001	680980-002	680980-003	680980-004	680980-005	680980-006
	<i>Field Id:</i>	BH-1 1'	BH-1 3'	BH-1 5'	BH-1 7'	BH-1 10'	BH-1 15'
	<i>Depth:</i>						
	<i>Matrix:</i>	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL
	<i>Sampled:</i>	12.07.2020 09:00	12.07.2020 09:05	12.07.2020 09:10	12.07.2020 09:15	12.07.2020 09:20	12.07.2020 09:30
Chloride by EPA 300	<i>Extracted:</i>	12.14.2020 15:41	12.14.2020 15:41	12.14.2020 15:41	12.14.2020 15:41	12.14.2020 15:41	12.14.2020 15:41
	<i>Analyzed:</i>	12.14.2020 23:19	12.14.2020 23:36	12.14.2020 23:41	12.14.2020 23:47	12.14.2020 23:52	12.15.2020 00:09
	<i>Units/RL:</i>	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL
Chloride		669 9.90	539 49.8	1500 49.6	5490 49.9	4100 49.8	7670 49.9

BRL - Below Reporting Limit

Houston - Dallas - Midland - Tampa - Phoenix - Lubbock - San Antonio - El Paso - Atlanta - New Mexico



Certificate of Analysis Summary 680980

COG Operating LLC, Artesia, NM

Project Name: Dodd Fed 980

Project Id:

Date Received in Lab: Mon 12.14.2020 14:12

Contact: Sheldon Hitchcock

Report Date: 12.15.2020 11:49

Project Location: Eddy County, New Mexico

Project Manager: Jessica Kramer

<i>Analysis Requested</i>	<i>Lab Id:</i>	680980-007	680980-008	680980-009	680980-010	680980-011	680980-012
	<i>Field Id:</i>	BH-1 20'	BH-1 25'	BH-1 30'	BH-1 35'	BH-1 40'	BH-1 45'
	<i>Depth:</i>						
	<i>Matrix:</i>	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL
	<i>Sampled:</i>	12.07.2020 09:40	12.07.2020 09:50	12.07.2020 10:00	12.07.2020 10:05	12.07.2020 10:10	12.07.2020 10:20
Chloride by EPA 300	<i>Extracted:</i>	12.14.2020 15:41	12.14.2020 15:41	12.14.2020 15:41	12.14.2020 15:41	12.14.2020 15:41	12.14.2020 15:41
	<i>Analyzed:</i>	12.15.2020 00:15	12.15.2020 00:20	12.15.2020 00:26	12.15.2020 00:31	12.15.2020 00:37	12.15.2020 00:54
	<i>Units/RL:</i>	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL
Chloride		6800 49.7	4730 50.1	5030 50.4	2630 50.1	798 9.94	40.7 9.98

BRL - Below Reporting Limit

Houston - Dallas - Midland - Tampa - Phoenix - Lubbock - San Antonio - El Paso - Atlanta - New Mexico





Analytical Report 680980

for

COG Operating LLC

Project Manager: Sheldon Hitchcock

Dodd Fed 980

12.15.2020

Collected By: Client

**1089 N Canal Street
Carlsbad, NM 88220**

Xenco-Houston (EPA Lab Code: TX00122):
Texas (T104704215-20-38), Arizona (AZ0765), Florida (E871002-33), Louisiana (03054)
Oklahoma (2020-014), North Carolina (681), Arkansas (20-035-0)

Xenco-Dallas (EPA Lab Code: TX01468):
Texas (T104704295-20-26), Arizona (AZ0809)

Xenco-El Paso (EPA Lab Code: TX00127): Texas (T104704221-20-18)
Xenco-Lubbock (EPA Lab Code: TX00139): Texas (T104704219-20-23)
Xenco-Midland (EPA Lab Code: TX00158): Texas (T104704400-19-21)
Xenco-Carlsbad (LELAP): Louisiana (05092)
Xenco-San Antonio (EPA Lab Code: TNI02385): Texas (T104704534-20-8)
Xenco-Tampa: Florida (E87429), North Carolina (483)



12.15.2020

Project Manager: **Sheldon Hitchcock**

COG Operating LLC

2407 Pecos Avenue

Artesia, NM 88210

Reference: Eurofins Xenco, LLC Report No(s): **680980**

Dodd Fed 980

Project Address: Eddy County, New Mexico

Sheldon Hitchcock:

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 Eurofins Xenco, LLC Report Number(s) 680980. 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 Eurofins Xenco, LLC. 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. 680980 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 Eurofins Xenco, LLC to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

A handwritten signature in black ink that reads "Jessica Kramer".

Jessica Kramer

Project Manager

A Small Business and Minority Company

Houston - Dallas - Midland - Tampa - Phoenix - Lubbock - San Antonio - El Paso - Atlanta - New Mexico

**Sample Cross Reference 680980****COG Operating LLC, Artesia, NM**

Dodd Fed 980

Sample Id	Matrix	Date Collected	Sample Depth	Lab Sample Id
BH-1 1'	S	12.07.2020 09:00		680980-001
BH-1 3'	S	12.07.2020 09:05		680980-002
BH-1 5'	S	12.07.2020 09:10		680980-003
BH-1 7'	S	12.07.2020 09:15		680980-004
BH-1 10'	S	12.07.2020 09:20		680980-005
BH-1 15'	S	12.07.2020 09:30		680980-006
BH-1 20'	S	12.07.2020 09:40		680980-007
BH-1 25'	S	12.07.2020 09:50		680980-008
BH-1 30'	S	12.07.2020 10:00		680980-009
BH-1 35'	S	12.07.2020 10:05		680980-010
BH-1 40'	S	12.07.2020 10:10		680980-011
BH-1 45'	S	12.07.2020 10:20		680980-012



CASE NARRATIVE

Client Name: COG Operating LLC

Project Name: Dodd Fed 980

Project ID:

Work Order Number(s): 680980

Report Date: 12.15.2020

Date Received: 12.14.2020

Sample receipt non conformances and comments:

Sample receipt non conformances and comments per sample:

None



Certificate of Analytical Results 680980

COG Operating LLC, Artesia, NM

Dodd Fed 980

Sample Id: **BH-1 1'**
Lab Sample Id: 680980-001

Matrix: Soil
Date Collected: 12.07.2020 09:00

Date Received: 12.14.2020 14:12

Analytical Method: Chloride by EPA 300

Prep Method: E300P

Tech: MAB

Analyst: MAB

Date Prep: 12.14.2020 15:41

% Moisture:
Basis: Wet Weight

Seq Number: 3144853

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	669	9.90	mg/kg	12.14.2020 23:19		1

**Certificate of Analytical Results 680980****COG Operating LLC, Artesia, NM**

Dodd Fed 980

Sample Id: **BH-1 3'**
Lab Sample Id: 680980-002

Matrix: Soil
Date Collected: 12.07.2020 09:05

Date Received: 12.14.2020 14:12

Analytical Method: Chloride by EPA 300

Prep Method: E300P

Tech: MAB

Analyst: MAB

Date Prep: 12.14.2020 15:41

% Moisture:
Basis: Wet Weight

Seq Number: 3144853

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	539	49.8	mg/kg	12.14.2020 23:36		5



Certificate of Analytical Results 680980

COG Operating LLC, Artesia, NM

Dodd Fed 980

Sample Id: **BH-1 5'**
Lab Sample Id: 680980-003

Matrix: Soil
Date Collected: 12.07.2020 09:10

Date Received: 12.14.2020 14:12

Analytical Method: Chloride by EPA 300

Prep Method: E300P

Tech: MAB

Analyst: MAB

Date Prep: 12.14.2020 15:41

% Moisture:
Basis: Wet Weight

Seq Number: 3144853

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	1500	49.6	mg/kg	12.14.2020 23:41		5



Certificate of Analytical Results 680980

COG Operating LLC, Artesia, NM

Dodd Fed 980

Sample Id: **BH-1 7'**

Matrix: Soil

Date Received: 12.14.2020 14:12

Lab Sample Id: 680980-004

Date Collected: 12.07.2020 09:15

Analytical Method: Chloride by EPA 300

Prep Method: E300P

Tech: MAB

Analyst: MAB

Date Prep: 12.14.2020 15:41

% Moisture:

Seq Number: 3144853

Basis: Wet Weight

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	5490	49.9	mg/kg	12.14.2020 23:47		5



Certificate of Analytical Results 680980

COG Operating LLC, Artesia, NM

Dodd Fed 980

Sample Id: **BH-1 10'**
Lab Sample Id: 680980-005

Matrix: Soil
Date Collected: 12.07.2020 09:20

Date Received: 12.14.2020 14:12

Analytical Method: Chloride by EPA 300

Prep Method: E300P

Tech: MAB

Analyst: MAB

Date Prep: 12.14.2020 15:41

% Moisture:
Basis: Wet Weight

Seq Number: 3144853

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	4100	49.8	mg/kg	12.14.2020 23:52		5

**Certificate of Analytical Results 680980****COG Operating LLC, Artesia, NM**

Dodd Fed 980

Sample Id: **BH-1 15'**
Lab Sample Id: 680980-006

Matrix: Soil
Date Collected: 12.07.2020 09:30

Date Received: 12.14.2020 14:12

Analytical Method: Chloride by EPA 300

Prep Method: E300P

Tech: MAB

Analyst: MAB

Date Prep: 12.14.2020 15:41

% Moisture:
Basis: Wet Weight

Seq Number: 3144853

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	7670	49.9	mg/kg	12.15.2020 00:09		5



Certificate of Analytical Results 680980

COG Operating LLC, Artesia, NM

Dodd Fed 980

Sample Id: **BH-1 20'**
Lab Sample Id: 680980-007

Matrix: Soil
Date Collected: 12.07.2020 09:40

Date Received: 12.14.2020 14:12

Analytical Method: Chloride by EPA 300

Prep Method: E300P

Tech: MAB

Analyst: MAB

Date Prep: 12.14.2020 15:41

% Moisture:
Basis: Wet Weight

Seq Number: 3144853

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	6800	49.7	mg/kg	12.15.2020 00:15		5

**Certificate of Analytical Results 680980****COG Operating LLC, Artesia, NM**

Dodd Fed 980

Sample Id: **BH-1 25'**

Matrix: Soil

Date Received: 12.14.2020 14:12

Lab Sample Id: 680980-008

Date Collected: 12.07.2020 09:50

Analytical Method: Chloride by EPA 300

Prep Method: E300P

Tech: MAB

Analyst: MAB

Date Prep: 12.14.2020 15:41

% Moisture:

Seq Number: 3144853

Basis: Wet Weight

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	4730	50.1	mg/kg	12.15.2020 00:20		5



Certificate of Analytical Results 680980

COG Operating LLC, Artesia, NM

Dodd Fed 980

Sample Id: **BH-1 30'**
Lab Sample Id: 680980-009

Matrix: Soil
Date Collected: 12.07.2020 10:00

Date Received: 12.14.2020 14:12

Analytical Method: Chloride by EPA 300

Prep Method: E300P

Tech: MAB

Analyst: MAB

Date Prep: 12.14.2020 15:41

% Moisture:
Basis: Wet Weight

Seq Number: 3144853

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	5030	50.4	mg/kg	12.15.2020 00:26		5



Certificate of Analytical Results 680980

COG Operating LLC, Artesia, NM

Dodd Fed 980

Sample Id: **BH-1 35'**
Lab Sample Id: 680980-010

Matrix: Soil
Date Collected: 12.07.2020 10:05

Date Received: 12.14.2020 14:12

Analytical Method: Chloride by EPA 300

Prep Method: E300P

Tech: MAB

Analyst: MAB

Date Prep: 12.14.2020 15:41

% Moisture:
Basis: Wet Weight

Seq Number: 3144853

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	2630	50.1	mg/kg	12.15.2020 00:31		5

**Certificate of Analytical Results 680980****COG Operating LLC, Artesia, NM**

Dodd Fed 980

Sample Id: **BH-1 40'**
Lab Sample Id: 680980-011

Matrix: Soil
Date Collected: 12.07.2020 10:10

Date Received: 12.14.2020 14:12

Analytical Method: Chloride by EPA 300

Prep Method: E300P

Tech: MAB

Analyst: MAB

Date Prep: 12.14.2020 15:41

% Moisture:
Basis: Wet Weight

Seq Number: 3144853

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	798	9.94	mg/kg	12.15.2020 00:37		1

**Certificate of Analytical Results 680980****COG Operating LLC, Artesia, NM**

Dodd Fed 980

Sample Id: **BH-1 45'**
Lab Sample Id: 680980-012

Matrix: Soil
Date Collected: 12.07.2020 10:20

Date Received: 12.14.2020 14:12

Analytical Method: Chloride by EPA 300

Prep Method: E300P

Tech: MAB

Analyst: MAB

Date Prep: 12.14.2020 15:41

% Moisture:
Basis: Wet Weight

Seq Number: 3144853

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	40.7	9.98	mg/kg	12.15.2020 00:54		1

Flagging Criteria

- X** In our quality control review of the data a QC deficiency was observed and flagged as noted. MS/MSD recoveries were found to be outside of the laboratory control limits due to possible matrix /chemical interference, or a concentration of target analyte high enough to affect the recovery of the spike concentration. This condition could also affect the relative percent difference in the MS/MSD.
- B** A target analyte or common laboratory contaminant was identified in the method blank. Its presence indicates possible field or laboratory contamination.
- D** The sample(s) were diluted due to targets detected over the highest point of the calibration curve, or due to matrix interference. Dilution factors are included in the final results. The result is from a diluted sample.
- E** The data exceeds the upper calibration limit; therefore, the concentration is reported as estimated.
- F** RPD exceeded lab control limits.
- J** The target analyte was positively identified below the quantitation limit and above the detection limit.
- U** Analyte was not detected.
- L** The LCS data for this analytical batch was reported below the laboratory control limits for this analyte. The department supervisor and QA Director reviewed data. The samples were either reanalyzed or flagged as estimated concentrations.
- H** The LCS data for this analytical batch was reported above the laboratory control limits. Supporting QC Data were reviewed by the Department Supervisor and QA Director. Data were determined to be valid for reporting.
- K** Sample analyzed outside of recommended hold time.
- JN** A combination of the "N" and the "J" qualifier. The analysis indicates that the analyte is "tentatively identified" and the associated numerical value may not be consistent with the amount actually present in the environmental sample.

** Surrogate recovered outside laboratory control limit.

BRL Below Reporting Limit. **ND** Not Detected.

RL Reporting Limit

MDL Method Detection Limit **SDL** Sample Detection Limit **LOD** Limit of Detection

PQL Practical Quantitation Limit **MQL** Method Quantitation Limit **LOQ** Limit of Quantitation

DL Method Detection Limit

NC Non-Calculable

SMP Client Sample **BLK** Method Blank

BKS/LCS Blank Spike/Laboratory Control Sample **BKSD/LCSD** Blank Spike Duplicate/Laboratory Control Sample Duplicate

MD/SD Method Duplicate/Sample Duplicate **MS** Matrix Spike **MSD:** Matrix Spike Duplicate

+ NELAC certification not offered for this compound.

* (Next to analyte name or method description) = Outside XENCO's scope of NELAC accreditation



COG Operating LLC

Dodd Fed 980

Analytical Method: Chloride by EPA 300

Seq Number: 3144853

MB Sample Id: 7717074-1-BLK

Matrix: Solid

LCS Sample Id: 7717074-1-BKS

Prep Method: E300P

Date Prep: 12.14.2020

LCSD Sample Id: 7717074-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	<10.0	250	262	105	264	106	90-110	1	20	mg/kg	12.14.2020 23:08	

Analytical Method: Chloride by EPA 300

Seq Number: 3144853

Parent Sample Id: 680980-001

Matrix: Soil

MS Sample Id: 680980-001 S

Prep Method: E300P

Date Prep: 12.14.2020

MSD Sample Id: 680980-001 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	669	199	866	99	838	91	90-110	3	20	mg/kg	12.14.2020 23:24	

Analytical Method: Chloride by EPA 300

Seq Number: 3144853

Parent Sample Id: 680980-011

Matrix: Soil

MS Sample Id: 680980-011 S

Prep Method: E300P

Date Prep: 12.14.2020

MSD Sample Id: 680980-011 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	798	200	1010	106	1000	102	90-110	1	20	mg/kg	12.15.2020 00:43	

MS/MSD Percent Recovery
Relative Percent Difference
LCS/LCSD Recovery
Log Difference

$[D] = 100 * (C - A) / B$
 $RPD = 200 * | (C - E) / (C + E) |$
 $[D] = 100 * (C) / [B]$
 Log Diff. = Log(Sample Duplicate) - Log(Original Sample)

LCS = Laboratory Control Sample
A = Parent Result
C = MS/LCS Result
E = MSD/LCSD Result

MS = Matrix Spike
B = Spike Added
D = MSD/LCSD % Rec

Analysis Request of Chain of Custody Record



One Concho Center 800 Illinois Avenue Midland, Texas
Tel (432) 683-7443

1080980

Client Name: COG-Artesia		Site Manager: Sheldon Hitchcock	
Project Name: Dadd Fed 980			
Project Location: (county, state) Edley, NM		Project #:	
Invoice to: Sheldon Hitchcock		Sampler Name: Sheldon Hitchcock	
Receiving Laboratory: Xeno		Comments:	

LAB # (LAB USE ONLY)	SAMPLE IDENTIFICATION	SAMPLING		MATRIX		PRESERVATIVE METHOD		# CONTAINERS	(C)omposite/(G)rab	TPH 8015M (GRO - DRO - MRO)	BTX 8021B	Chloride	Hold		
		YEAR	DATE	TIME	WATER	SOIL	HCL							HNO ₃	ICE
		2020													
BH-1 1'		12/7	9:00		X			X							
BH-1 3'			9:05												
BH-1 5'			9:10												
BH-1 7'			9:15												
BH-1 10'			9:20												
BH-1 15'			9:30												
BH-1 20'			9:40												
BH-1 25'			9:50												
BH-1 30'			10:00												
BH-1 35'			10:05												

LAB USE ONLY	REMARKS:
Sample Temperature 12/1.0	<input checked="" type="checkbox"/> RUSH: Same Day 24 hr 48 hr 72 hr <input type="checkbox"/> Rush Charges Authorized <input type="checkbox"/> Special Report Limits or TRRP Report

ORIGINAL COPY

(Circle) HAND DELIVERED FEDEX UPS Tracking #:

Eurofins Xenco, LLC

Prelogin/Nonconformance Report- Sample Log-In

Client: COG Operating LLC

Date/ Time Received: 12.14.2020 02.12.00 PM

Work Order #: 680980

Acceptable Temperature Range: 0 - 6 degC

Air and Metal samples Acceptable Range: Ambient

Temperature Measuring device used : T_NM_007

Sample Receipt Checklist	Comments
#1 *Temperature of cooler(s)?	1
#2 *Shipping container in good condition?	Yes
#3 *Samples received on ice?	Yes
#4 *Custody Seals intact on shipping container/ cooler?	Yes
#5 Custody Seals intact on sample bottles?	Yes
#6 *Custody Seals Signed and dated?	Yes
#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)?	No
#18 Water VOC samples have zero headspace?	N/A

Samples received in bulk containers.

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

Analyst:

PH Device/Lot#:

Checklist completed by:



Cloe Clifton

Date: 12.14.2020

Checklist reviewed by:



Jessica Kramer

Date: 12.15.2020

Incident ID	
District RP	
Facility ID	
Application ID	

Remediation Plan

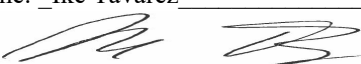
Remediation Plan Checklist: *Each of the following items must be included in the plan.*

- ☐ Detailed description of proposed remediation technique
- ☐ Scaled sitemap with GPS coordinates showing delineation points
- ☐ Estimated volume of material to be remediated
- ☐ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☐ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- ☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- ☐ Extents of contamination must be fully delineated.
- ☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.

Printed Name: Ike Tavarez Title: Senior HSE Supervisor
Signature:  Date: 6/24/2021
email: Ike.Tavarez@conocophillips.com Telephone: (432) 701-8630

OCD Only

Received by: Chad Hensley Date: 06/24/2021

☒ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature:  Date: 06/24/2021

District I

1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720

District II

811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720

District III

1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170

District IV

1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 26039

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 26039
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
chensley	None	6/24/2021