

SITE INFORMATION

Incident # nAB1911242727

Report Type: Work Plan Addendum

2RP-5360

General Site Information:

Site:	Burch Keely Unit Satellite G CTB					
Company:	COG Operating LLC					
Section, Township and Range	Unit L	Sec. 19	T 17S	R 30E		
Lease Number:						
County:	Eddy County					
GPS:	32.81624			-104.01595		
Surface Owner:	Fee					
Mineral Owner:						
Directions:	From the intersection of Lovington HWY and General American Rd (CR 216), travel south on CR 216 for approximately 415 feet, turn east onto Arco Rd and continue for 0.20 miles to the location on the south side of the road.					

Release Data:

Date Released:	3/27/2019
Type Release:	Oil & Produced Water
Source of Contamination:	Flowline
Fluid Released:	8 bbl oil & 9 bbls water
Fluids Recovered:	2 bbls oil & 3 bbls water

Official Communication:

Name:	Ike Tavarez		Clair Gonzales
Company:	COG Operating, LLC		Tetra Tech
Address:	One Concho Center		901 West Wall Street
	600 W. Illinois Ave.		Suite 100
City:	Midland Texas, 79701		Midland, Texas
Phone number:	(432) 686-3023		(432) 687-8110
Fax:	(432) 684-7137		
Email:	itavarez@concho.com		Clair.Gonzales@tetrattech.com

Site Characterization

Depth to Groundwater:	Greater than 100' below surface
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Recommended Remedial Action Levels (RRALs)

Benzene	Total BTEX	TPH (GRO+DRO)	TPH (GRO+DRO+MRO)	Chlorides
10 mg/kg	50 mg/kg	1,000 mg/kg	2,500 mg/kg	20,000 mg/kg



October 11, 2019

Mr. Mike Bratcher
District Supervisor
Oil Conservation Division, District 2
811 S. First Street
Artesia, New Mexico 88210

**Re: Addendum Report
COG Operating, LLC, Burch Keely Unit Satellite G CTB
Unit L, Section 19, Township 17 South, Range 30 East,
Eddy County, New Mexico.
2RP-5360**

Mr. Bratcher:

Tetra Tech, Inc. (Tetra Tech) was contacted by COG Operating, LLC (COG) to assess a release that occurred at the Burch Keely Unit Satellite G CTB, Unit L, Section 19, Township 17 South, Range 30 East, Eddy County, New Mexico (Site). The spill site coordinates are 32.81624°, -104.01595°.

COG submitted a work plan, dated August 6, 2019, detailing the proposed remediation activities for the site. According to the proposed plan, COG proposed a (passive) soil vapor extraction (SVE) to remediate the impacted soils. Based on discussions with the NMOCD, additional information and extraction points (vent wells) were requested to properly capture the extents to remediate of the subsurface impact.

Addendum Proposal

Active - Soil Vapor Extraction (SVE)

Upon further review, COG is proposing an aggressive approach on remediating the site. Instead of the passive SVE remediation technology, COG will be performing active SVE remediation technology to remediate the site in a timely manner. Prior to implementing the remediation system, SVE wells will be installed to perform a SVE pilot test to evaluate the subsurface permeability, determine the effectiveness of removing the Volatile Organic Compounds (VOC) from the subsurface soils and well spacing between extraction wells.

Tetra Tech

901 West Wall St, Suite 100, Midland, TX 79701

Tel 432.682.4559 Fax 432.682.3946 www.tetrattech.com



COG proposes to perform the following activities:

- COG will install boreholes around the perimeter using an air rotary rig to define the horizontally extents. Soil samples will be field screened with a PID and selected samples will be analyzed for TPH, BTEX and chlorides. These boreholes are proposed to determine the horizontal aerial extents of impacted soils for the implementation of the SVE system and design.
- For the initial phase, a total of five (5) 4-inch SVE wells will be installed at the site to perform the SVE pilot study. The proposed well locations are shown on Figure 4. Three (3) shallow wells will be installed to a total depth of 40-50' below surface and screened from approximately 5.0' to 50' below surface. Two (2) deep SVE wells will be installed to a total depth of approximately 100' below surface and constructed of 4" PVC and screened from approximately 50' to 100' below surface.
- The pilot SVE study will be performed utilizing the wells onsite to evaluate the effectiveness of the proposed remediation and determine adequate well spacing.
- As discussed in the submitted work plan, dated August 6, 2019, COG proposed to excavate the impacted soils to a depth of 4.0' below surface and cap the area with a 20-mil liner. Due to the surface lines, underground lines and safety concerns, the proposed liner will not be installed in the area. However, COG will perform some removal to the impacted soils to the maximum extent practicable.

Conclusion

Prior to implementing the remediation, COG will submit a summary of the pilot SVE results and proposed remediation plan for the site. If you have any questions or comments concerning the assessment or remediation activities for this site, please call at (432) 682-4559.

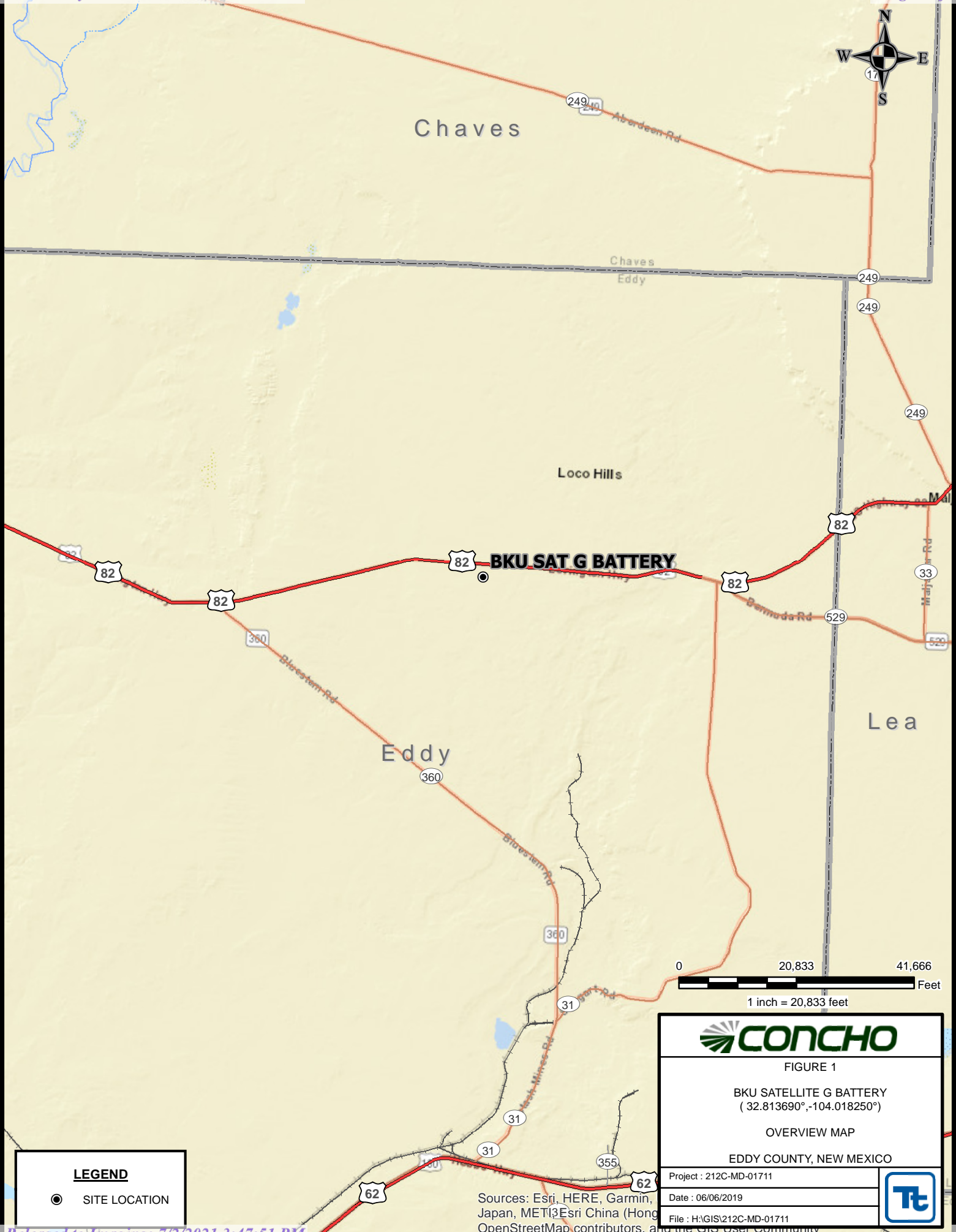
Respectfully submitted,
TETRA TECH

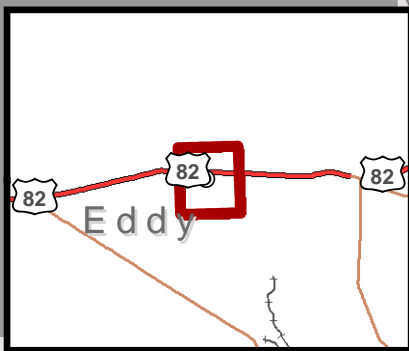
A handwritten signature in blue ink that reads 'Clair Gonzales'.

Clair Gonzales, P.G.
Project Manager

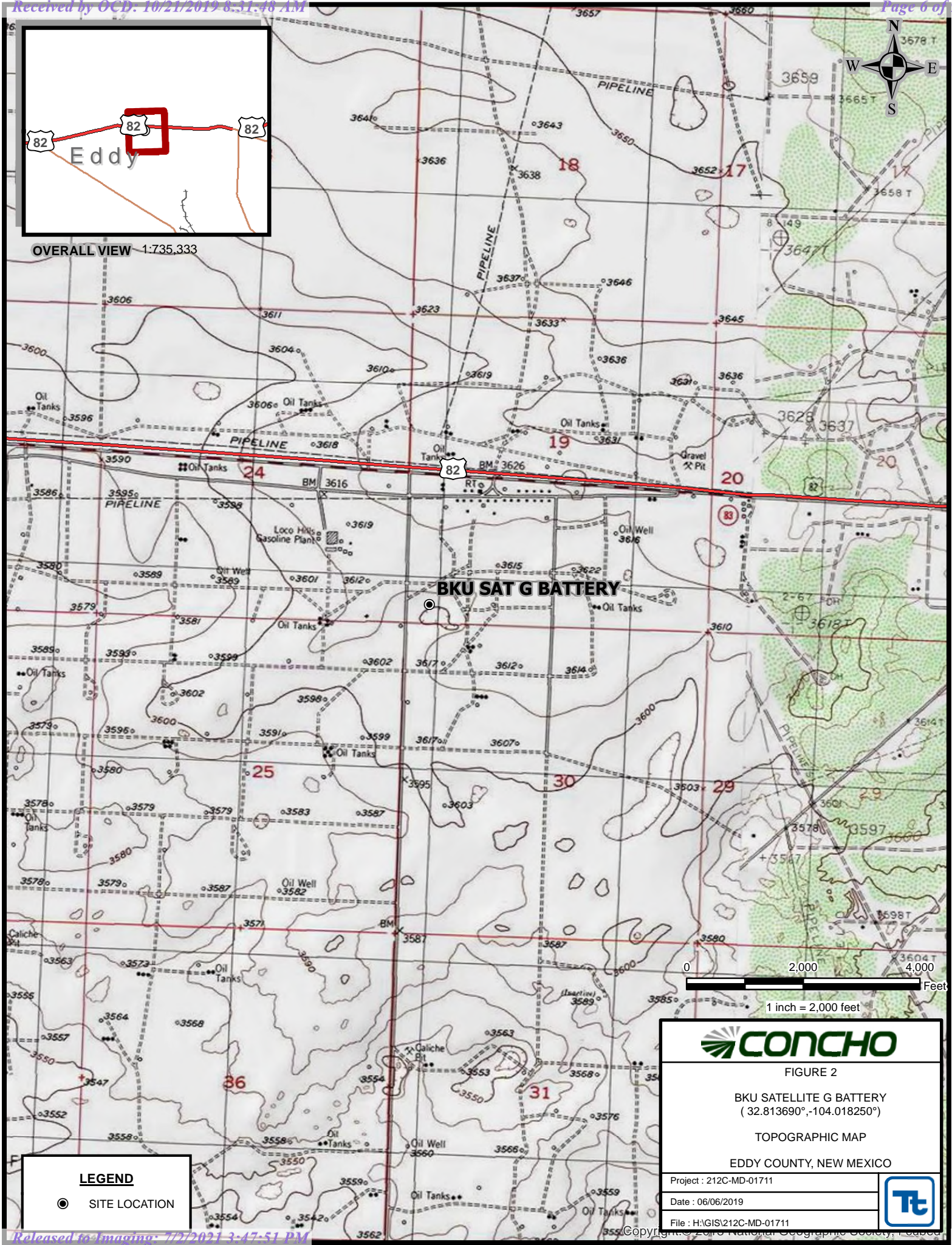
cc:
Ike Tavarez - COG

Figures





OVERALL VIEW 1:735,333



BKU SAT G BATTERY

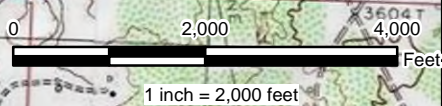


FIGURE 2

BKU SATELLITE G BATTERY
(32.813690°,-104.018250°)

TOPOGRAPHIC MAP

EDDY COUNTY, NEW MEXICO

Project : 212C-MD-01711

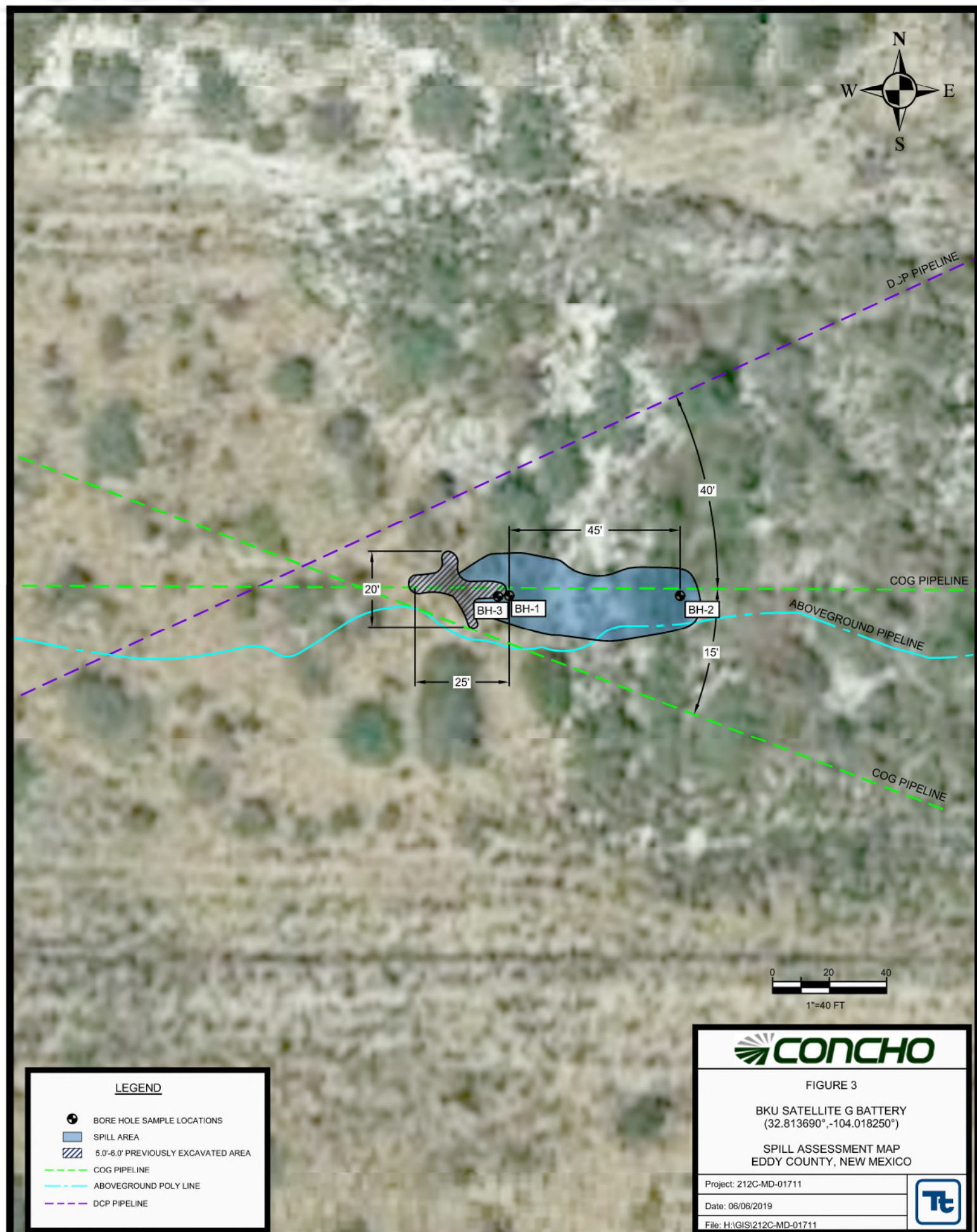
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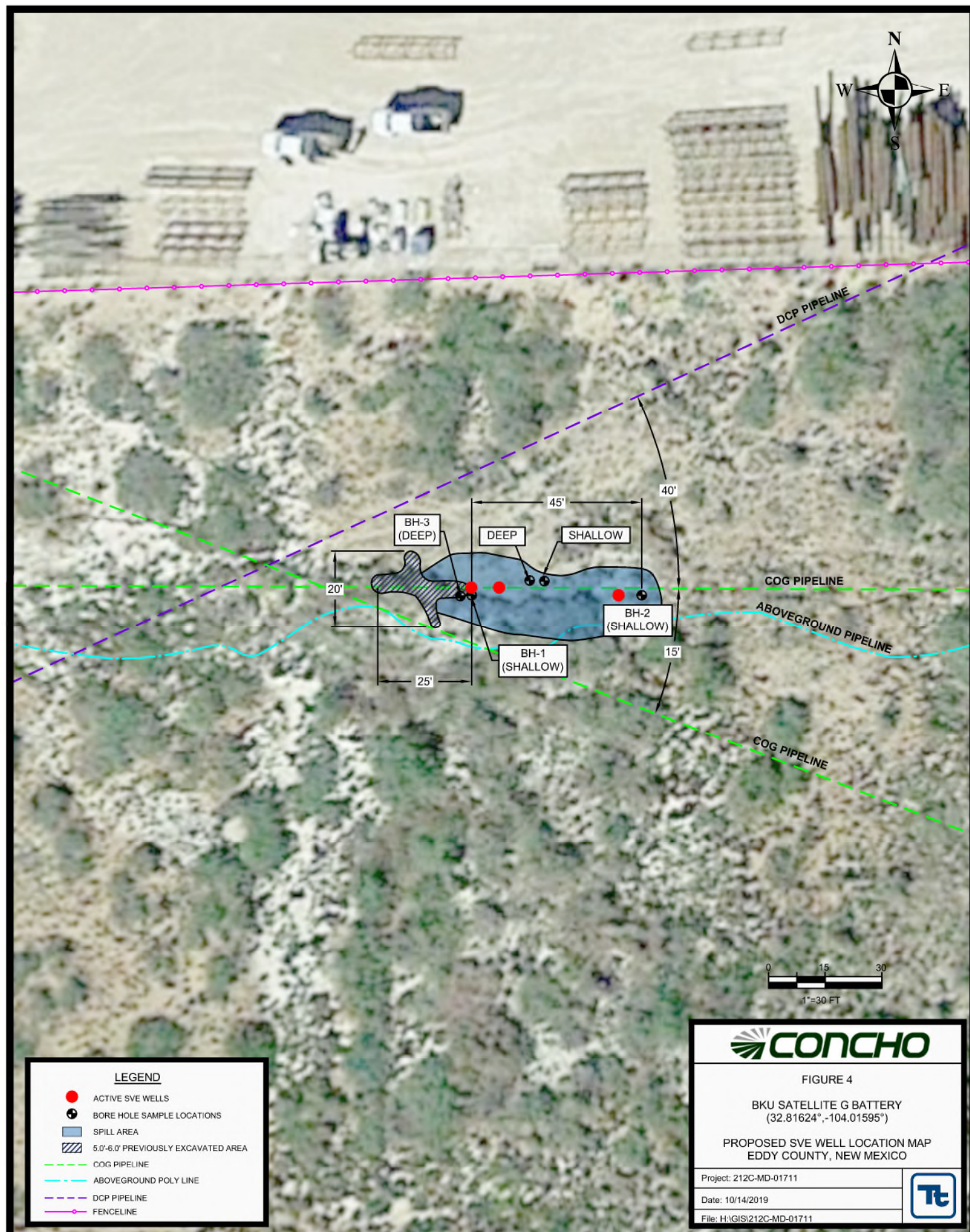
File : H:\GIS\212C-MD-01711



LEGEND

- SITE LOCATION





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 1953

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 1953
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
bbillings	Consider decreased slotted length, with possible multi-slotted pipe in each boring, sealed off. Eval and note both radius of influence and effective radius	7/2/2021