



**Dakota Neel**  
Environmental Coordinator

June 11, 2018

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

Henryetta Price  
Bureau of Land Management  
Field Operations Division  
620 E. Greene St  
Carlsbad, NM 88220

**Re: Closure Report**  
**White Star Federal Tank Battery**  
**2RP-3903**  
**H Sec. 29, T17S-R29E**  
**Eddy County, NM**

Mr. Bratcher/Ms. Price,

COG Operating, LLC (COG) is pleased to submit for your consideration the following closure report for the White Star Federal Tank Battery. This closure report is in reference to the release that occurred on September 14, 2016. A work plan was submitted to the New Mexico Oil Conservation Division (NMOCD) and the Bureau of Land Management (BLM) on March 31, 2017 and was approved on August 29, 2017 and August 28, 2017 respectively.

### **Background**

This release was caused by a corroded connection between the tank and sight glass. Upon discovery, the corroded connection was repaired and a vac truck was dispatched to soak up standing fluid. The release remained within the unlined facility.

NMOCD  
June 11, 2018  
Page 2

## REMEDIAL ACTIONS

- The area of T1 was excavated to a total depth of one (1) foot.
- The excavation was backfilled with like material and contoured to match the surrounding area

Based on the information provided, COG Operating LLC, would like to request closure of the RP number 2RP-3903 associated with this release. Please feel free to contact me with any questions or concerns at (432) 215-2783.

Sincerely,

A handwritten signature in black ink that reads "Dakota Neel". The signature is written in a cursive, slightly slanted style.

Dakota Neel,  
Environmental Coordinator

Enclosure(s):

- C-141 Final
- C-141 Initial (Copy)
- Approved Work Plan

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

Form C-141  
Revised August 8, 2011

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

## Release Notification and Corrective Action

### OPERATOR

☐ Initial Report ☒ Final Report

Name of Company: COG Operating LLC OGRID # 229137	Contact: Robert McNeill
Address: 600 West Illinois Avenue, Midland TX 79701	Telephone No. 432-683-7443
Facility Name: White Star Federal Tank Battery	Facility Type: Battery
Surface Owner: Federal	Mineral Owner: Federal
API No. 30-015-29986	

### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
H	29	17S	29E	2150	North	330	East	Eddy

Latitude 32.8068848 Longitude -104.089447

### NATURE OF RELEASE

Type of Release: Oil & Produced Water	Volume of Release: 5 bbls Oil; 1 bbls PW	Volume Recovered: 4 bbls oil; 0.5 bbls PW
Source of Release: Sight Glass	Date and Hour of Occurrence: 9/14/2016	Date and Hour of Discovery: 9/14/2016 8:00 AM
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour:	
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.\*

The release was caused by a corroded connection between the tank and sight glass. The corroded connection was replaced.

Describe Area Affected and Cleanup Action Taken.\*

The release remained in location within the bermed area. A vacuum truck was dispatched to remove all freestanding fluids. This release has been remediated according the workplan approved by the NMOCD and BLM.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 		<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Dakota Neel		Approved by Environmental Specialist: 	
Title: HSE Coordinator	Approval Date: 11/18/2022	Expiration Date:	
E-mail Address: <a href="mailto:dneel2@concho.com">dneel2@concho.com</a>	Conditions of Approval:		Attached <input type="checkbox"/>
Date: June 11, 2018 Phone: 575-746-2010	none		

\* Attach Additional Sheets If Necessary

Page 4 of 14  
Received by OGD: 11/18/2022 10:35:04 AM  
Released to Imaging: 11/18/2022 10:36:16 AM

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
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1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

Form C-141  
Revised August 8, 2011

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

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: COG Operating LLC	Contact: Robert McNeill
Address: 600 West Illinois Avenue, Midland TX 79701	Telephone No. 432-230-0077
Facility Name: White Star Federal Tank Battery	Facility Type: Battery

Surface Owner: Federal	Mineral Owner: Federal	API No. 30-015-29986
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LOCATION OF RELEASE

Unit Letter H	Section 29	Township 17S	Range 29E	Feet from the 2150	North/South Line North	Feet from the 330	East/West Line East	County Eddy
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32.8068848,-104.089447

NATURE OF RELEASE


Type of Release: Oil & Produced Water	Volume of Release: 5 bbls oil; 1 bbls pw	Volume Recovered: 4 bbls oil; 0.5 bbls pw
Source of Release: Sight Glass	Date and Hour of Occurrence: 9/14/2016 unknown	Date and Hour of Discovery: 9/14/2016 8:00 a.m.
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour:	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*  
This release was caused by a corroded connection between the tank and sight glass. The corroded connection was replaced.

Describe Area Affected and Cleanup Action Taken.\*  
This release remained on location within the bermed area. Vacuum trucks were immediately dispatched to recover all standing fluid. The contaminated gravel has been removed and replaced with fresh gravel. Concho will have the spill site sampled to delineate any possible contamination from the release and we will present a remediation work plan to the NMOCD for approval prior to any significant remediation work.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Dakota Neel	Approved by Environmental Specialist:	
Title: Environmental Coordinator	Approval Date:	Expiration Date:
E-mail Address: dneel2@concho.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: September 21, 2016 Phone: 575-748-6933		

Attach Additional Sheets If Necessary



Dakota Neel  
Environmental Coordinator

February 27, 2017

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

**Re: White Star Federal Tank Battery**  
**Sec. 29, T17S-R29E**  
**Eddy County, NM**

Mr. Mike Bratcher,

COG Operating LLC would like to submit for your consideration the enclosed work plan for the above captioned well. The plan is in response to the C-141 Initial report dated September 21 , 2016.

**Background**

This release was caused by a corroded connection between the tank and sight glass. Upon discovery, the corroded connection was repaired and a vac truck was dispatched to soak up standing fluid. The release remained within the unlined facility.

**Groundwater**

Based on the information obtained through the use of the Chevron-Texaco Maps, the release area would be classified at a site ranking of **Zero** with depth to groundwater at greater than 100'.

**Soil Assessment and Analytical Results**

The sample point for the release is labeled T1 on the attached Site Diagram. According to the analytical results obtained, T1 had an elevated concentration of chloride to a depth of 5' with delineation showing a decrease in concentration. Copies of the analytical results along with a site diagram and sample summary table are attached for your consideration.

**CORPORATE ADDRESS**

One Concho Center | 600 West Illinois Avenue | Midland, Texas 79701  
P 432.683.7443 | F 432.683.7441

**ARTESIA EAST OFFICE**

2407 Pecos Avenue | Artesia, New Mexico 88210  
P 575.746.2010 | F 575.746.2096

February 27, 2017

White Star Federal Tank Battery	
Site Ranking: Zero	
Depth to GW per SEO: >100	
Delineation Samples 1/23/2017	
S1	Cl-
1'	1150
2'	400
3'	240
4'	352
5'	400
7'	288
8'	256
10'	272
12'	64

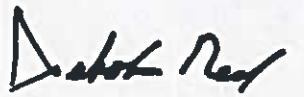
**Work Plan**

COG Operating LLC proposes the following excavations for remediation of the release area:

T1 – Excavate to a depth of approximately 1’ due to the close proximity of the release to equipment and safety concerns.

If there are no objections or further stipulations, COG Operating LLC would like to begin the remediation process based on approval of this work plan. Please feel free to contact me with any questions or concerns.

Sincerely,



Dakota Neel,  
Environmental Coordinator

- Enclosure(s): Site Diagram  
Sample Summary Table  
Analytical Results  
C-141 Initial (Copy)



# White Star Federal Tank Battery

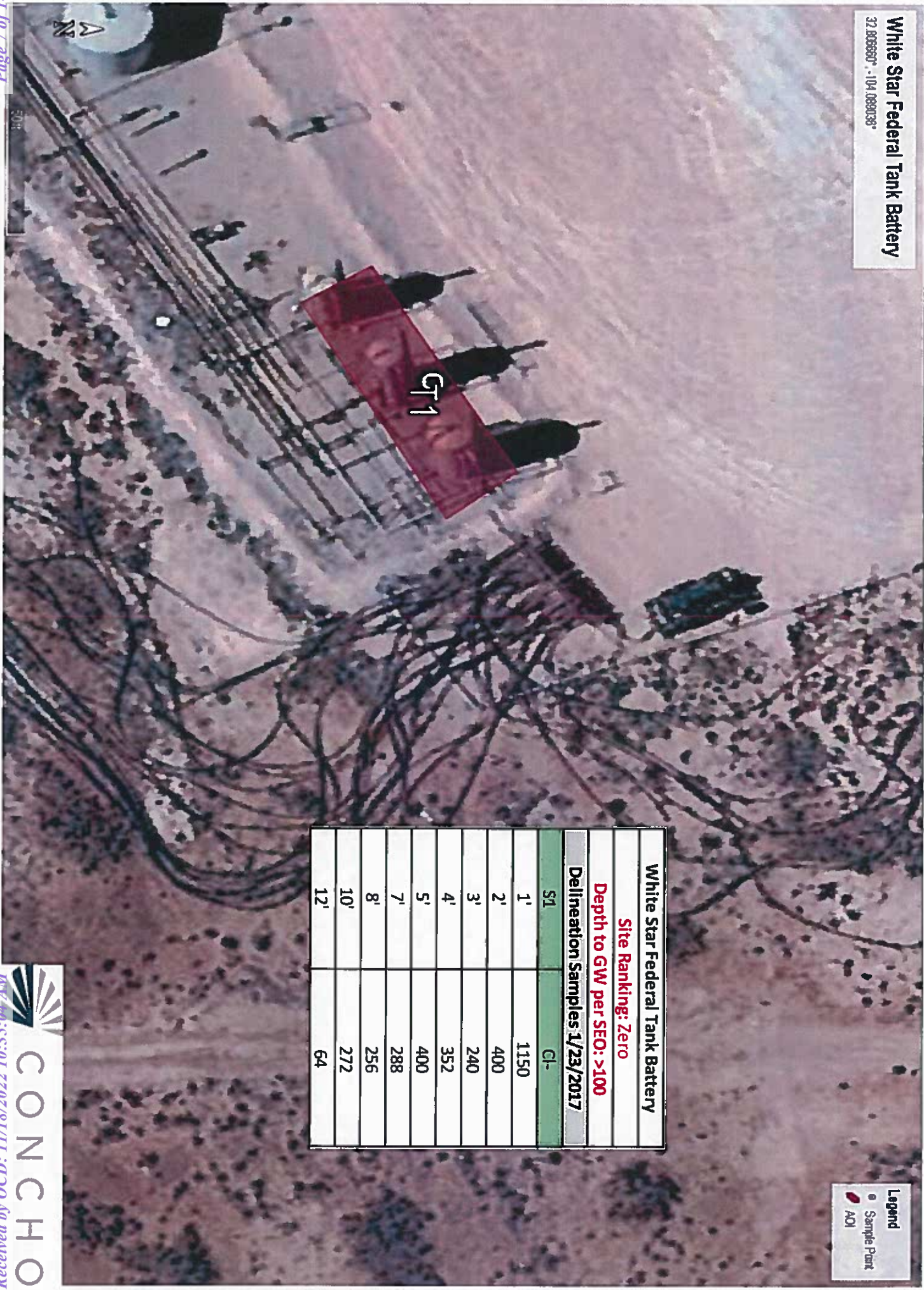
White Star Federal Tank Battery  
32.803660° -104.009036°

Legend

● Sample Point

■ AOI

White Star Federal Tank Battery	
Site Ranking: Zero	
Depth to GW per SEO: >100	
Delineation Samples: 1/23/2017	
S1	CI-
1'	1150
2'	400
3'	240
4'	352
5'	400
7'	288
8'	256
10'	272
12'	64





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Facility Name: White Star Federal Tank Battery	Facility Type: Battery

Surface Owner: Federal	Mineral Owner: Federal	API No. 30-015-29986
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By Whom?	Date and Hour:	
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Signature: 		<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Dakota Neel		Approved by Environmental Specialist:	
Title: Environmental Coordinator		Approval Date:	Expiration Date:
E-mail Address: dneel2@concho.com		Conditions of Approval:	Attached <input type="checkbox"/>
Date: September 21, 2016 Phone: 575-748-6933			

\* Attach Additional Sheets If Necessary





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

January 31, 2017

DAKOTA NEEL

COG OPERATING

P. O. BOX 1630

ARTESIA, NM 88210

RE: WHITE STAR FEDERAL TANK BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 01/25/17 12:15.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-16-8. 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,

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: 01/25/2017  
 Reported: 01/31/2017  
 Project Name: WHITE STAR FEDERAL TANK BATTERY  
 Project Number: NONE GIVEN  
 Project Location: NOT GIVEN

Sampling Date: 01/23/2017  
 Sampling Type: Soil  
 Sampling Condition: \*\* (See Notes)  
 Sample Received By: Angela Cabrera

**Sample ID: T1 - 1' (H700184-01)**

Chloride, SM4500Cl-B

mg/kg

Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1150	16.0	01/28/2017	ND	432	108	400	3.77	

**Sample ID: T1 - 2' (H700184-02)**

Chloride, SM4500Cl-B

mg/kg

Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	400	16.0	01/28/2017	ND	432	108	400	3.77	

**Sample ID: T1 - 3' (H700184-03)**

Chloride, SM4500Cl-B

mg/kg

Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	240	16.0	01/28/2017	ND	432	108	400	3.77	

**Sample ID: T1 - 4' (H700184-04)**

Chloride, SM4500Cl-B

mg/kg

Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	352	16.0	01/28/2017	ND	432	108	400	3.77	

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: 01/25/2017  
 Reported: 01/31/2017  
 Project Name: WHITE STAR FEDERAL TANK BATTERY  
 Project Number: NONE GIVEN  
 Project Location: NOT GIVEN

Sampling Date: 01/23/2017  
 Sampling Type: Soil  
 Sampling Condition: \*\* (See Notes)  
 Sample Received By: Angela Cabrera

**Sample ID: T1 - 5' (H700184-05)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	400	16.0	01/28/2017	ND	432	108	400	3.77	

**Sample ID: T1 - 7' (H700184-06)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	288	16.0	01/28/2017	ND	432	108	400	3.77	

**Sample ID: T1 - 8' (H700184-07)**

Chloride, SM4500Cl-B		mg/kg	Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	256	16.0	01/28/2017	ND	432	108	400	3.77	

**Sample ID: T1 - 10' (H700184-08)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	272	16.0	01/28/2017	ND	432	108	400	3.77	

**Sample ID: T1 - 12' (H700184-09)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	01/28/2017	ND	432	108	400	3.77	

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



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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

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.

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

<b>Company Name:</b> COG Operating LLC		<b>P.O. #:</b>		
<b>Project Manager:</b> Dakota Noel		<b>Company:</b> COG Operating LLC		
<b>Address:</b> 2208 West Main		<b>Attn:</b> Robert McNeill		
<b>City:</b> Artesia	<b>State:</b> NM	<b>Zip:</b> 88210		
<b>Phone #:</b> 432-215-2783	<b>Fax #:</b>	<b>Address:</b> 600 W Illinois		
<b>Project #:</b>	<b>Project Owner:</b>	<b>City:</b> Midland		
<b>Project Name:</b> White Star Federal Tank Battery		<b>State:</b> TX	<b>Zip:</b> 79701	
<b>Project Location:</b>		<b>Phone #:</b> (432) 221-0388		
<b>Sampler Name:</b>	<b>Fax #:</b>			

FOR LAB USE ONLY		MATRIX		PRESERV	SAMPLING	ANALYSIS REQUEST																		
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER	ACID/BASE	ICE / COOL	OTHER	DATE	TIME	BTEX	TPH	Chloride							
H700194	T1-1'												1/23/17	10:00 AM			X							
01	T1-2'												1/23/17	10:00 AM			X							
02	T1-3'												1/23/17	10:00 AM			X							
03	T1-4'												1/23/17	10:00 AM			X							
04	T1-5'												1/23/17	10:00 AM			X							
05	T1-7'												1/23/17	10:00 AM			X							
06	T1-8'												1/23/17	10:00 AM			X							
07	T1-10'												1/23/17	10:00 AM			X							
08	T1-12'												1/23/17	10:00 AM			X							
09																								

PLEASE NOTE: Liability and Damages. Customer's liability and owner's obligation terminate upon receipt of this report by the client for the analysis. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Consultant within 30 days after completion of the applicable service. In no event shall Consultant be liable for incidental or consequential damages, including without limitation, business interruption, 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 Client's signature of order such claim is hereby agreed to be waived. Any of the above stated limitations or otherwise.

<b>Relinquished By:</b>	<b>Date:</b> 1-25-17	<b>Received By:</b>	<b>Phone Result:</b>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<b>Add'l Phone #:</b>
<b>Delivered By:</b> (Circle One)	<b>Time:</b> 12:15	<b>Signature:</b>	<b>Fax Result:</b>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<b>Add'l Fax #:</b>
<b>Sampler - UPS - Bus - Other:</b>	<b>REMARKS:</b>	<b>CHECKED BY:</b> (Initials)				

1. Please fax written changes to 575-393-2476

dnoel@concho.com

**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 160047

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 160047
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

Created By	Condition	Condition Date
bhall	None	11/18/2022