



[Sheldon L. Hitchcock]  
[HSE Coordinator]

March 22, 2019

Bradford Billings  
Oil Conservation Division  
1220 S. St Francis Dr. #3  
Santa Fe, NM 87505

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

**Re: Closure Letter**  
**SRO State Com #060H**  
**API #: 30-015-41741**  
**RP#: 2RP-4740**  
**Unit Letter H, Section 10, Township 26 S, Range 28 E**  
**Eddy County, New Mexico**

Mr. Billings/Mr. Mann,

COG Operating, LLC (COG) is pleased to submit for your consideration the following closure report for the SRO State Com #060H. This release occurred on May 3, 2018. Following the release an assessment of impacted soils was conducted. A remediation work plan was submitted to and subsequently approved by the New Mexico Oil Conservation Division (NMOCD) and the New Mexico State Land Office (NMSLO). A copy of the approved work plan is attached in Appendix V.

## **BACKGROUND**

The SRO State Com #060H release was located in Unit Letter H, Section 10, Township 26 South and Range 28 East in Eddy County, New Mexico. More specifically the latitude and longitude for this release are 32.0582 North and -104.0677 West.

On May 3, 2018, a flowline failed resulting in the release of approximately six (6) barrels (bbls) of produced water.

Remediation activities were conducted in accordance with the approved work plan and NMOCD/NMSLO stipulations. The analytical results from the stipulated confirmation soil sampling activities are summarized in the table below. A site diagram of the excavated area is presented in Appendix I.

March 22, 2019

**GROUNDWATER AND SITE RANKING**

According New Mexico Office of the State Engineer groundwater in the project vicinity is approximately one-hundred and twenty (120) feet below ground surface (BGS) (Appendix II). No water well or surface water was observed within one-thousand (1,000) feet of the release site. Therefore the site ranking for this release is zero (0) based on the following:

Depth to groundwater >100-feet  
 Distance to surface water body >1000-feet  
 Wellhead Protection Area >1000-feet

**CONFIRMATION SOIL SAMPLING RESULTS**

Sample ID	Sample Depth (ft)	Sample Date	Soil Status		Chloride (mg/kg)
			In-Situ	Removed	
NMOCD RRAL Limits (mg/kg)					20,000
S-2 E	N/A	10/10/2018	X		192
S-2 S.	N/A	10/10/2018	X		176
S-2 W.	N/A	10/10/2018	X		96
S-2 N.	N/A	10/10/2018	X		48
NORTH	N/A	10/10/2018	X		208

March 22, 2019

## REMEDIAL ACTIONS

- The impacted area in the vicinity of sample location SP-1 was excavated to a depth of one-half (0.5) foot BGS.
- The impacted area in the vicinity of sample location SP-2 was excavated to a depth of four (4) feet BGS.
- All of the excavated material was hauled to an NMOCD approved solid waste disposal facility.
- Confirmation sidewall samples were collected from the four (4) foot excavation per NMSLO stipulations.
- Upon receipt of analytical results from stipulated confirmation soil sampling activities a 20-mil poly liner was installed in the bottom of the excavation in the vicinity of sample location SP-2 in order to encapsulate the remaining chloride impacts. The excavation was backfilled with clean “like” material and contoured to match the surrounding location.


March 22, 2019

## CLOSURE REQUEST

COG Operating, LLC respectfully requests that the New Mexico Oil Conservation Division and the Bureau of Land Management grant closure approval for the SRO State Com #060H incident that occurred on May 3, 2018.

Should you have any questions or concerns please do not hesitate to contact me.

Sincerely,



Sheldon L. Hitchcock  
HSE Coordinator  
[slhitchcock@concho.com](mailto:slhitchcock@concho.com)

Enclosed:

- Appendix I: Site Diagram
- Appendix II: Groundwater Data
- Appendix III: Initial C-141 (Copy)
- Appendix IV: Final C-141
- Appendix V: Work Plan (Copy)
- Appendix VI: Analytical Reports and Chain-of-Custody Forms

# APPENDIX I



May 3, 2018

# SRO State Com #o6oH



# APPENDIX II



# 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	POD Sub-Code	basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	Distance	Depth Well	Depth Water	Water Column
<a href="#">C 02479</a>	CUB	ED		4	4	10	26S	28E		587909	3546534*	807	200		
<a href="#">C 02480</a>	CUB	ED		4	4	10	26S	28E		587909	3546534*	807	150		
<a href="#">C 02924</a>	C	ED		1	3	2	11	26S	28E	589032	3547451*	1129			
<a href="#">C 02160 S5</a>	CUB	ED		1	1	1	14	26S	28E	588225	3546237*	1148	300	120	180
<a href="#">C 02481</a>	CUB	ED		1	1	14	26S	28E		588326	3546138*	1273	200		
<a href="#">C 02160 S3</a>	CUB	ED		2	2	1	14	26S	28E	588834	3546241*	1437	300	120	180
<a href="#">C 02160 S4</a>	CUB	ED		2	2	1	14	26S	28E	588834	3546241*	1437	300	120	180

Average Depth to Water: **120 feet**

Minimum Depth: **120 feet**

Maximum Depth: **120 feet**

Record Count: 7

### Basin/County Search:

County: Eddy

### UTMNAD83 Radius Search (in meters):

Easting (X): 587908

Northing (Y): 3547341

Radius: 1500

\*UTM location was derived from PLSS - see Help

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.

3/22/19 12:50 PM

Page 1 of 1

WATER COLUMN/ AVERAGE  
DEPTH TO WATER



# APPENDIX III

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

MAY 04 2018

Form C-141  
Revised April 3, 2017

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

DISTRICT II ARTESIA OCD  
Submit Copy to appropriate District Office in accordance with 19.15.29 NMAC.

## Release Notification and Corrective Action

NAB1813441720

## 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: SRO State Com #060H Battery	Facility Type: Flowline

Surface Owner: State	Mineral Owner: State	API No. 30-015-41741
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## LOCATION OF RELEASE

Unit Letter H	Section 10	Township 26S	Range 28E	Feet from the 2,450	North/South Line North	Feet from the 380	East/West Line East	County Eddy
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Latitude 32.0582 Longitude -104.0677 NAD83

## NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: 6 bbl.	Volume Recovered: 0 bbl.
Source of Release: Flowline Rupture	Date and Hour of Occurrence: May 3, 2018 8:00 am	Date and Hour of Discovery: May 3, 2018 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 flowline rupture. Flowline was repaired.

Describe Area Affected and Cleanup Action Taken.\*

The release was within a pasture. A vacuum truck was dispatched to remove all freestanding fluids. Concho will have the spill area sampled to delineate 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.

Signature: <i>DeAnn Grant</i>		OIL CONSERVATION DIVISION	
Printed Name: DeAnn Grant		Approved by Environmental Specialist: <i>Mike Brandon</i>	
Title: HSE Administrative Assistant		Approval Date: 5/9/18	Expiration Date: N/A
E-mail Address: agrant@concho.com		Conditions of Approval: <i>See attached</i>	
Date: May 4, 2018 Phone: 432-253-4513		Attached <input checked="" type="checkbox"/> <i>APP 4740</i>	

\* Attach Additional Sheets If Necessary

# APPENDIX IV

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

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>Sheldon Nitan</u>	Date: _____
email: _____	Telephone: _____
<b><u>OCD Only</u></b>	
Received by: _____	Date: _____

Incident ID	
District RP	
Facility ID	
Application ID	

## Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

**Closure Report Attachment Checklist:** *Each of the following items must be included in the closure report.*

- ☐ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☐ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☐ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☐ Description of 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 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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

Signature: Sheldon Hittman Date: \_\_\_\_\_

email: \_\_\_\_\_ Telephone: \_\_\_\_\_

### OCD Only

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: Ashley Maxwell Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_



# APPENDIX V



PHONE (575) 397-6388 • FAX (575) 397- 0397 • 1324 W. MARLAND • P.O. BOX 805 • HOBBS, NM 88241-0805  
E-MAIL: cbrunson@bbcinternational.com

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## DELINEATION WORKPLAN

### COG – SRO STATE COM #060H BATTERY (Leak Date: 5/3/18)

**RP # 2RP-4740**  
**API # 30-015-41741**

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This delineation workplan and remediation proposal addresses the release associated with RP # 2RP-4740.

The following information includes:

1. Scaled digital site map with spill area demarcated and leak point identified along with sample point locations and areas of remediation at appropriate depths.
2. GPS information for sample points and sample methodology
3. Depth to groundwater information (i.e., pdf of OSE search results and/or copy of Chevron groundwater trend map).
4. Laboratory analysis results summary table and original laboratory analysis reports
5. A copy of the initial C-141
6. Potentially other pertinent information as necessary for site specific purposes.

***Based on the information included in this package and the NMOCD guidelines, the following remediation is proposed:***

***COG will excavate the spill area as depicted on the following site diagram. The leak area near SP1 (yellow shade on diagram) will be excavated to a depth of 6 inches. The leak area near SP2 (pink shade on diagram) will be excavated to a depth of 4 feet with an impermeable liner placed in the bottom of the excavation. The leak area near SP3 and SP4 (blue shade on diagram) will not require any remediation.***

The entire site will then be backfilled with clean soil and revegetated (if warranted) to the standards of the appropriate regulatory agency or private surface owner.

All excavated materials will be disposed of at an NMOCD-approved disposal facility.

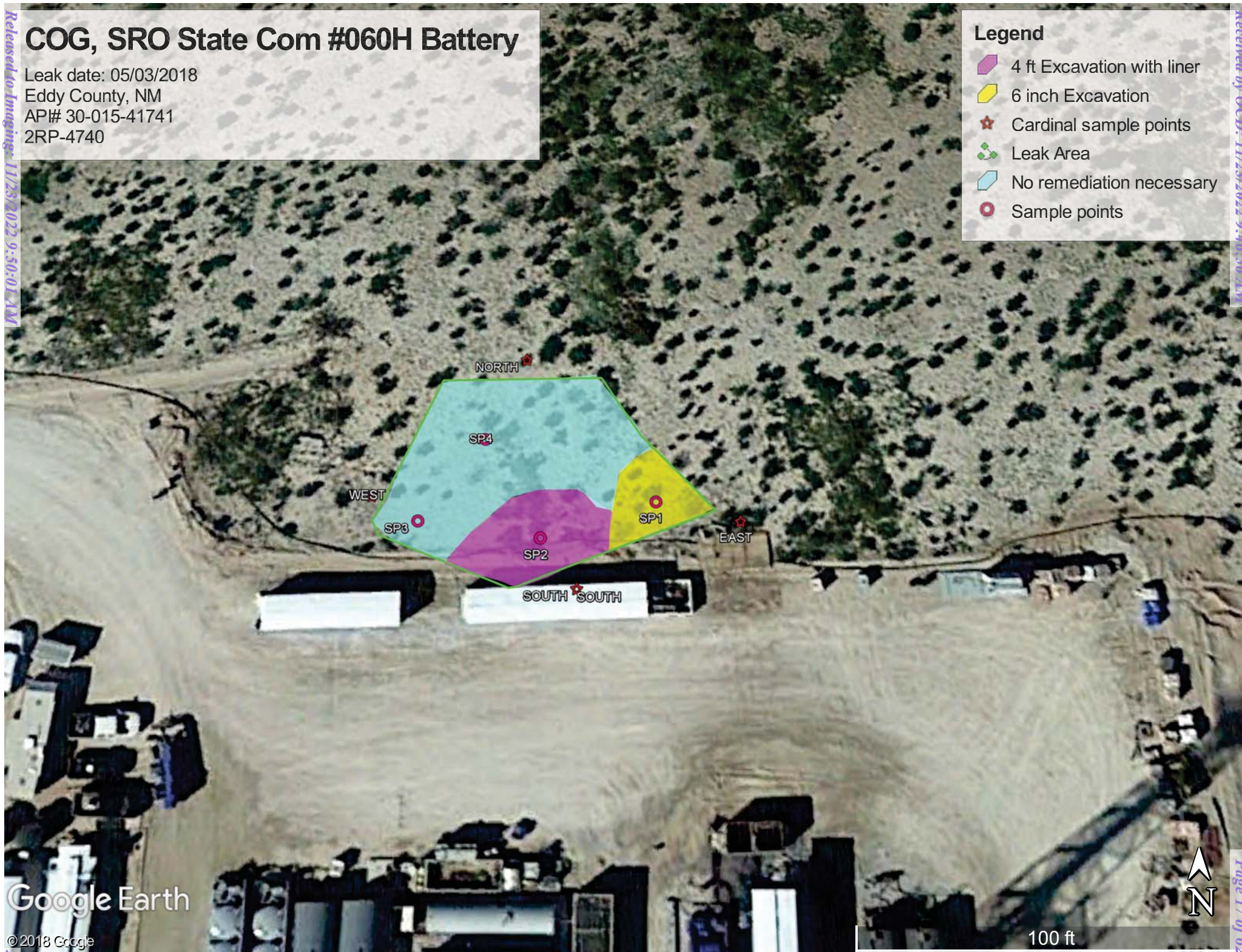


# COG, SRO State Com #060H Battery

Leak date: 05/03/2018  
Eddy County, NM  
API# 30-015-41741  
2RP-4740

## Legend

- 4 ft Excavation with liner
- 6 inch Excavation
- Cardinal sample points
- Leak Area
- No remediation necessary
- Sample points



Google Earth

© 2018 Google

100 ft







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PHONE (575) 397-6388 • FAX (575) 397- 0397 • 1324 W. MARLAND • P.O. BOX 805 • HOBBS, NM 88241-0805

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## **New Mexico State Land Office Revegetation and Noxious Weed Management Plan**

### **COG – SRO State Com #006H Battery**

#### **Revegetation Plan**

Disturbed areas associated with the remediation efforts will be reseeded. If after one growing season, the vegetation has not taken hold, seeding may need to be repeated until revegetation is successful, as determined by the State Land Office. The seed will be spread by either using a hand-held broadcaster or tractor-mounted broadcaster and the area will be raked or dragged to cover the seed. Since the seed will be broadcast, the pounds per acre will be double over the amount used by drill planting.

The seed mixture will be the appropriate mixture for the specific site and planted in the required amounts of pounds pure live seed (PLS) per acre. Commercially sold seed will be either certified or registered and will not contain primary or secondary noxious weeds.

Gamma grass – 40% - 1.5 lbs. PLS

Buffalo grass – 40% - 1.5 lbs. PLS

Side oats – 10% - 0.5% lbs. PLS

Four wing Salt bush – 10% - 1.5 lbs. PLS

#### **Noxious Weed Management Plan**

The site will be visited to assess the establishment of vegetative growth. Personnel performing the site visit will also look for the presence of noxious weeds at the site as indicated on the New Mexico Noxious Weeds List specified on the United States Department of Agriculture website. If a noxious weed is observed at the site, the NMSLO will be contacted to determine the most effective manner to eradicate it.

COG, SRO State Com #060H Battery

Sample points

SP1, N 32.05827 W-104.06768

SP2, N 32.05824 W-104.06779

SP3, N 32.05826 W-104.06790

SP4, N 32.05833 W-104.06784

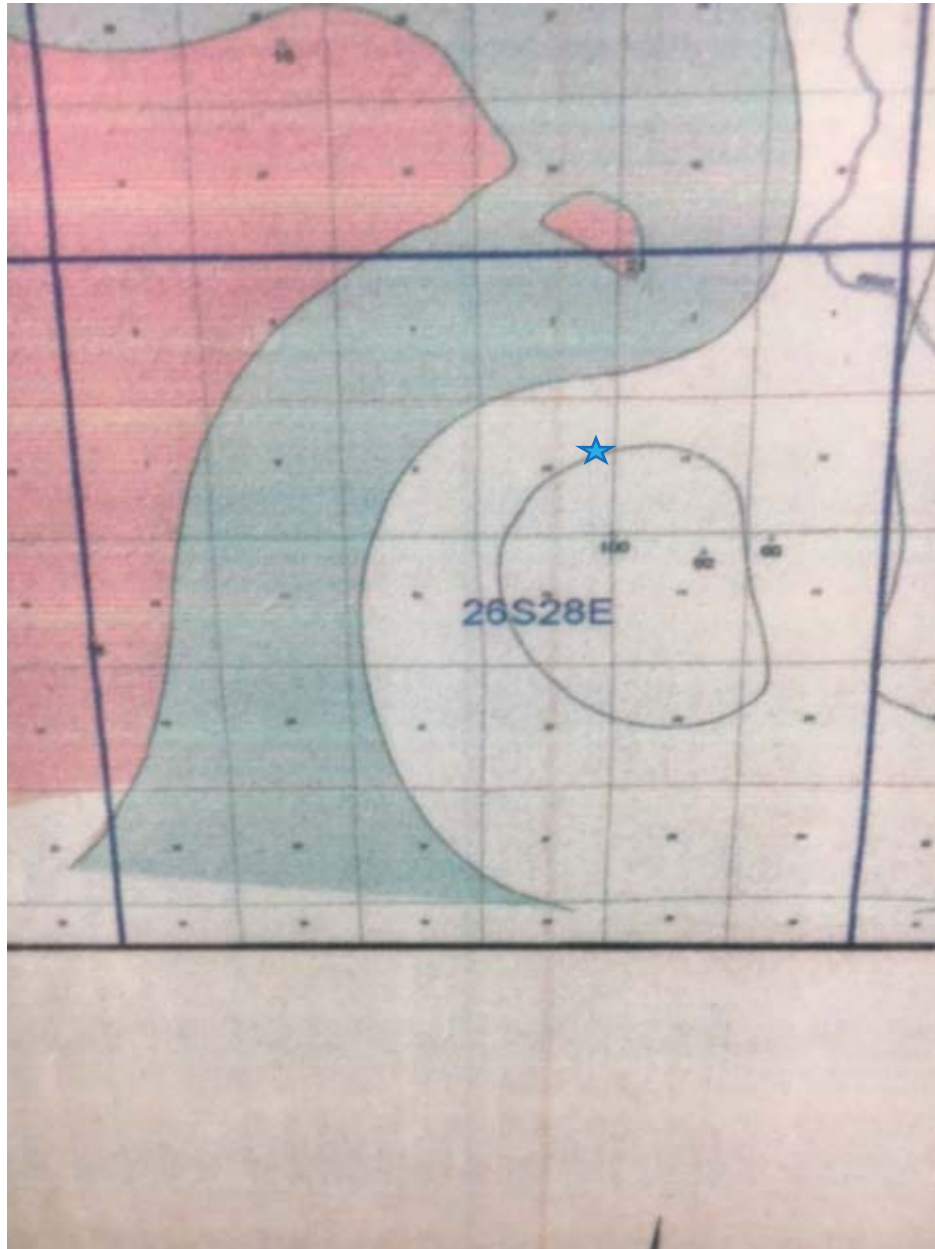
NORTH, N 32.05840 W-104.06781

SOUTH, N 32.05820 W-104.06775

EAST, N 32.05826 W-104.06760

WEST, N 32.05828 W-104.06795

**COG, SRO State Com #060H Battery**  
**U/L H, Section 10, T26S, R28E**  
**Groundwater: 75'**







## 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	Tw	Rng	X	Y	Distance	DepthWell	DepthWater	Water Column
<a href="#">C 02479</a>		CUB	ED	4	4	10	26S	28E		587909	3546534*	807	200		
<a href="#">C 02480</a>		CUB	ED	4	4	10	26S	28E		587909	3546534*	807	150		
<a href="#">C 02924</a>		C	ED	1	3	2	11	26S	28E	589032	3547451*	1129			
<a href="#">C 02160 S5</a>		CUB	ED	1	1	1	14	26S	28E	588225	3546237*	1148	300	120	180
<a href="#">C 02481</a>		CUB	ED	1	1	14	26S	28E		588326	3546138*	1273	200		
<a href="#">C 02160 S3</a>		CUB	ED	2	2	1	14	26S	28E	588834	3546241*	1437	300	120	180
<a href="#">C 02160 S4</a>		CUB	ED	2	2	1	14	26S	28E	588834	3546241*	1437	300	120	180
<a href="#">C 02160 S</a>		CUB	ED	1	1	2	14	26S	28E	589043	3546244*	1578	300	120	180
<a href="#">C 02160 S2</a>		CUB	ED	1	1	2	14	26S	28E	589043	3546244*	1578	300	120	180
Average Depth to Water:														120 feet	
Minimum Depth:														120 feet	
Maximum Depth:														120 feet	

**Record Count:** 9

**UTMNAD83 Radius Search (in meters):**

**Easting (X):** 587908

**Northing (Y):** 3547341

**Radius:** 1700

\*UTM location was derived from PLSS - see Help

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.

5/14/18 9:03 AM

WATER COLUMN/ AVERAGE DEPTH TO  
WATER

**Public Land Survey System (PLSS)**

☒ Q64:  Q16:  Q4:  Sec:  Tws:  Rng:

**State Plane Coordinate System - NAD27**

☐ X:  ft Y:  ft Zone:

**State Plane Coordinate System - NAD83**

☐ X:  ft Y:  ft Zone:

**Degrees/Minutes/Seconds**

☐ Longitude (X): Degrees:  ° Minutes:  ' Seconds:  "

Latitude (Y): Degrees:  ° Minutes:  ' Seconds:  "

**UTM - NAD27**

☐ Easting (X):  mtrs Northing (Y):  mtrs Zone:

**SUBMIT****All Conversion Results are displayed as NAD 1983 UTM Zone 13**Easting (X):  mtrsNorthing (Y):  mtrs**~~ Please keep screen open to copy UTM values for Reports. ~~**

Laboratory Analytical Results Summary  
SRO State Com #060H

		Sample ID	SP1 @ SURFACE	SP1 @ 1'	SP1 @ 6'
Analyte	Method	Date	5/23/18	5/23/18	5/23/18
			mg/kg	mg/kg	mg/kg
Benzene	BTEX 8021B		n/a	<0.050	n/a
Toluene	BTEX 8021B		n/a	<0.050	n/a
Ethylbenzene	BTEX 8021B		n/a	<0.050	n/a
Total Xylenes	BTEX 8021B		n/a	<0.150	n/a
Total BTEX	BTEX 8021B		n/a	<0.300	n/a
Chloride	SM4500Cl-B		44400	32	80
GRO	TPH 8015M		n/a	<10.0	n/a
DRO	TPH 8015M		n/a	<10.0	n/a
EXT DRO	TPH 8015M		n/a	<10.0	n/a

		Sample ID	SP2 @ 1'	SP2 @ 3'	SP2 @ 5'	SP2 @ 6'	SP2 @ 7'	SP2 @ 8'	SP2 @ 12'
Analyte	Method	Date	5/23/18	5/23/18	5/23/18	5/23/18	5/23/18	5/23/18	5/23/18
			mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Benzene	BTEX 8021B		<0.050	n/a	n/a	n/a	n/a	n/a	n/a
Toluene	BTEX 8021B		<0.050	n/a	n/a	n/a	n/a	n/a	n/a
Ethylbenzene	BTEX 8021B		<0.050	n/a	n/a	n/a	n/a	n/a	n/a
Total Xylenes	BTEX 8021B		<0.150	n/a	n/a	n/a	n/a	n/a	n/a
Total BTEX	BTEX 8021B		<0.300	n/a	n/a	n/a	n/a	n/a	n/a
Chloride	SM4500Cl-B		27600	32400	9400	6660	16	20600	16
GRO	TPH 8015M		<10.0	n/a	n/a	n/a	n/a	n/a	n/a
DRO	TPH 8015M		<10.0	n/a	n/a	n/a	n/a	n/a	n/a
EXT DRO	TPH 8015M		<10.0	n/a	n/a	n/a	n/a	n/a	n/a

		Sample ID	SP3 @ SURFACE	SP3 @ 1'	SP3 @ 6'
Analyte	Method	Date	5/23/18	5/23/18	5/23/18
			mg/kg	mg/kg	mg/kg
Benzene	BTEX 8021B		n/a	<0.050	n/a
Toluene	BTEX 8021B		n/a	<0.050	n/a
Ethylbenzene	BTEX 8021B		n/a	<0.050	n/a
Total Xylenes	BTEX 8021B		n/a	<0.150	n/a
Total BTEX	BTEX 8021B		n/a	<0.300	n/a
Chloride	SM4500Cl-B		48	32	80
GRO	TPH 8015M		n/a	<10.0	n/a
DRO	TPH 8015M		n/a	<10.0	n/a
EXT DRO	TPH 8015M		n/a	<10.0	n/a

		Sample ID	SP4 @ SURFACE	SP4 @ 1'	SP4 @ 6'
Analyte	Method	Date	5/23/18	5/23/18	5/23/18
			mg/kg	mg/kg	mg/kg
Benzene	BTEX 8021B		n/a	<0.050	n/a
Toluene	BTEX 8021B		n/a	<0.050	n/a
Ethylbenzene	BTEX 8021B		n/a	<0.050	n/a
Total Xylenes	BTEX 8021B		n/a	<0.150	n/a
Total BTEX	BTEX 8021B		n/a	<0.300	n/a
Chloride	SM4500Cl-B		32	32	80
GRO	TPH 8015M		n/a	<10.0	n/a
DRO	TPH 8015M		n/a	<10.0	n/a
EXT DRO	TPH 8015M		n/a	<10.0	n/a

		Sample ID	NORTH
Analyte	Method	Date	5/23/18
			mg/kg
Benzene	BTEX 8021B		<0.050
Toluene	BTEX 8021B		<0.050
Ethylbenzene	BTEX 8021B		<0.050
Total Xylenes	BTEX 8021B		<0.150
Total BTEX	BTEX 8021B		<0.300
Chloride	SM4500Cl-B		32
GRO	TPH 8015M		<10.0
DRO	TPH 8015M		<10.0
EXT DRO	TPH 8015M		<10.0

		Sample ID	EAST
Analyte	Method	Date	5/23/18
			mg/kg
Benzene	BTEX 8021B		<0.050
Toluene	BTEX 8021B		<0.050
Ethylbenzene	BTEX 8021B		<0.050
Total Xylenes	BTEX 8021B		<0.150
Total BTEX	BTEX 8021B		<0.300
Chloride	SM4500Cl-B		32
GRO	TPH 8015M		<10.0
DRO	TPH 8015M		<10.0
EXT DRO	TPH 8015M		<10.0

		Sample ID	SOUTH
Analyte	Method	Date	5/23/18
			mg/kg
Benzene	BTEX 8021B		<0.050
Toluene	BTEX 8021B		<0.050
Ethylbenzene	BTEX 8021B		<0.050
Total Xylenes	BTEX 8021B		<0.150
Total BTEX	BTEX 8021B		<0.300
Chloride	SM4500Cl-B		32
GRO	TPH 8015M		<10.0
DRO	TPH 8015M		<10.0
EXT DRO	TPH 8015M		<10.0

		Sample ID	WEST
Analyte	Method	Date	5/23/18
			mg/kg
Benzene	BTEX 8021B		<0.050
Toluene	BTEX 8021B		<0.050
Ethylbenzene	BTEX 8021B		<0.050
Total Xylenes	BTEX 8021B		<0.150
Total BTEX	BTEX 8021B		<0.300
Chloride	SM4500Cl-B		64
GRO	TPH 8015M		<10.0
DRO	TPH 8015M		<10.0
EXT DRO	TPH 8015M		<10.0



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May 31, 2018

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: SRO STATE COM #060H

Enclosed are the results of analyses for samples received by the laboratory on 05/24/18 14:40.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-17-10. 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, flowing style.

Celey D. Keene

Lab Director/Quality Manager



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

**Analytical Results For:**

BBC International, Inc.  
 Cliff Brunson  
 P.O. Box 805  
 Hobbs NM, 88241  
 Fax To: (575) 397-0397

Received:	05/24/2018	Sampling Date:	05/23/2018
Reported:	05/31/2018	Sampling Type:	Soil
Project Name:	SRO STATE COM #060H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	COG - EDDY CO		

**Sample ID: SP 1 @ SURFACE (H801424-01)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	44400	16.0	05/25/2018	ND	400	100	400	7.69		

**Sample ID: SP 1 @ 1' (H801424-02)**

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	05/25/2018	ND	1.70	85.2	2.00	2.11	
Toluene*	<0.050	0.050	05/25/2018	ND	1.70	85.1	2.00	3.26	
Ethylbenzene*	<0.050	0.050	05/25/2018	ND	1.76	88.1	2.00	0.591	
Total Xylenes*	<0.150	0.150	05/25/2018	ND	5.28	88.0	6.00	0.437	
Total BTEx	<0.300	0.300	05/25/2018	ND					

Surrogate: 4-Bromofluorobenzene (PID) 123 % 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
Chloride	32.0	16.0	05/25/2018	ND	400	100	400	7.69	

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	05/25/2018	ND	233	117	200	1.37	
DRO >C10-C28*	<10.0	10.0	05/25/2018	ND	225	113	200	1.48	
EXT DRO >C28-C36	<10.0	10.0	05/25/2018	ND					

Surrogate: 1-Chlorooctane 90.6 % 41-142

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

BBC International, Inc.  
 Cliff Brunson  
 P.O. Box 805  
 Hobbs NM, 88241  
 Fax To: (575) 397-0397

Received:	05/24/2018	Sampling Date:	05/23/2018
Reported:	05/31/2018	Sampling Type:	Soil
Project Name:	SRO STATE COM #060H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	COG - EDDY CO		

**Sample ID: SP 1 @ 1' (H801424-02)**

TPH 8015M			mg/kg							
			Analyzed By: MS							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Surrogate: 1-Chlorooctadecane	90.5 %	37.6-147								

**Sample ID: SP 1 @ 6' (H801424-03)**

Chloride, SM4500Cl-B			mg/kg							
			Analyzed By: AC							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	80.0	16.0	05/25/2018	ND	400	100	400	7.69		

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Celey D. Keene, Lab Director/Quality Manager





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**Analytical Results For:**

BBC International, Inc.  
 Cliff Brunson  
 P.O. Box 805  
 Hobbs NM, 88241  
 Fax To: (575) 397-0397

Received:	05/24/2018	Sampling Date:	05/23/2018
Reported:	05/31/2018	Sampling Type:	Soil
Project Name:	SRO STATE COM #060H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	COG - EDDY CO		

**Sample ID: SP 2 @ 1' (H801424-04)**

BTX 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	05/25/2018	ND	1.70	85.2	2.00	2.11		
Toluene*	<0.050	0.050	05/25/2018	ND	1.70	85.1	2.00	3.26		
Ethylbenzene*	<0.050	0.050	05/25/2018	ND	1.76	88.1	2.00	0.591		
Total Xylenes*	<0.150	0.150	05/25/2018	ND	5.28	88.0	6.00	0.437		
Total BTX	<0.300	0.300	05/25/2018	ND						

Surrogate: 4-Bromofluorobenzene (PID) 117 % 69.8-142

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	27600	16.0	05/25/2018	ND	400	100	400	7.69	

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	05/25/2018	ND	233	117	200	1.37	
DRO >C10-C28*	<10.0	10.0	05/25/2018	ND	225	113	200	1.48	
EXT DRO >C28-C36	<10.0	10.0	05/25/2018	ND					

Surrogate: 1-Chlorooctane 81.1 % 41-142

Surrogate: 1-Chlorooctadecane 79.0 % 37.6-147

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

BBC International, Inc.  
 Cliff Brunson  
 P.O. Box 805  
 Hobbs NM, 88241  
 Fax To: (575) 397-0397

Received:	05/24/2018	Sampling Date:	05/23/2018
Reported:	05/31/2018	Sampling Type:	Soil
Project Name:	SRO STATE COM #060H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	COG - EDDY CO		

**Sample ID: SP 2 @ 3' (H801424-05)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32400	16.0	05/25/2018	ND	400	100	400	7.69		

**Sample ID: SP 2 @ 5' (H801424-06)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	9400	16.0	05/25/2018	ND	432	108	400	0.00	QM-07	

**Sample ID: SP 2 @ 6' (H801424-07)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	6660	16.0	05/25/2018	ND	432	108	400	0.00		

**Sample ID: SP 2 @ 7' (H801424-08)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	05/25/2018	ND	432	108	400	0.00	

**Sample ID: SP 2 @ 8' (H801424-09)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	20600	16.0	05/25/2018	ND	432	108	400	0.00	

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

BBC International, Inc.  
 Cliff Brunson  
 P.O. Box 805  
 Hobbs NM, 88241  
 Fax To: (575) 397-0397

Received:	05/24/2018	Sampling Date:	05/23/2018
Reported:	05/31/2018	Sampling Type:	Soil
Project Name:	SRO STATE COM #060H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	COG - EDDY CO		

**Sample ID: SP 3 @ SURFACE (H801424-10)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	48.0	16.0	05/25/2018	ND	432	108	400	0.00		

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

BBC International, Inc.  
 Cliff Brunson  
 P.O. Box 805  
 Hobbs NM, 88241  
 Fax To: (575) 397-0397

Received:	05/24/2018	Sampling Date:	05/23/2018
Reported:	05/31/2018	Sampling Type:	Soil
Project Name:	SRO STATE COM #060H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	COG - EDDY CO		

**Sample ID: SP 3 @ 1' (H801424-11)**

BTX 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	05/25/2018	ND	1.70	85.2	2.00	2.11		
Toluene*	<0.050	0.050	05/25/2018	ND	1.70	85.1	2.00	3.26		
Ethylbenzene*	<0.050	0.050	05/25/2018	ND	1.76	88.1	2.00	0.591		
Total Xylenes*	<0.150	0.150	05/25/2018	ND	5.28	88.0	6.00	0.437		
Total BTX	<0.300	0.300	05/25/2018	ND						

Surrogate: 4-Bromofluorobenzene (PID) 115 % 69.8-142

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	05/25/2018	ND	432	108	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	05/25/2018	ND	233	117	200	1.37	
DRO >C10-C28*	<10.0	10.0	05/25/2018	ND	225	113	200	1.48	
EXT DRO >C28-C36	<10.0	10.0	05/25/2018	ND					

Surrogate: 1-Chlorooctane 91.3 % 41-142

Surrogate: 1-Chlorooctadecane 88.3 % 37.6-147

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

BBC International, Inc.  
 Cliff Brunson  
 P.O. Box 805  
 Hobbs NM, 88241  
 Fax To: (575) 397-0397

Received:	05/24/2018	Sampling Date:	05/23/2018
Reported:	05/31/2018	Sampling Type:	Soil
Project Name:	SRO STATE COM #060H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	COG - EDDY CO		

**Sample ID: SP 3 @ 6' (H801424-12)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	80.0	16.0	05/25/2018	ND	432	108	400	0.00		

**Sample ID: SP 4 @ SURFACE (H801424-13)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	05/25/2018	ND	432	108	400	0.00	

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

BBC International, Inc.  
 Cliff Brunson  
 P.O. Box 805  
 Hobbs NM, 88241  
 Fax To: (575) 397-0397

Received:	05/24/2018	Sampling Date:	05/23/2018
Reported:	05/31/2018	Sampling Type:	Soil
Project Name:	SRO STATE COM #060H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	COG - EDDY CO		

**Sample ID: SP 4 @ 1' (H801424-14)**

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	05/25/2018	ND	1.70	85.2	2.00	2.11		
Toluene*	<0.050	0.050	05/25/2018	ND	1.70	85.1	2.00	3.26		
Ethylbenzene*	<0.050	0.050	05/25/2018	ND	1.76	88.1	2.00	0.591		
Total Xylenes*	<0.150	0.150	05/25/2018	ND	5.28	88.0	6.00	0.437		
Total BTEX	<0.300	0.300	05/25/2018	ND						

Surrogate: 4-Bromofluorobenzene (PID) 110 % 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	
Chloride	32.0	16.0	05/25/2018	ND	432	108	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	05/25/2018	ND	233	117	200	1.37	
DRO >C10-C28*	<10.0	10.0	05/25/2018	ND	225	113	200	1.48	
EXT DRO >C28-C36	<10.0	10.0	05/25/2018	ND					

Surrogate: 1-Chlorooctane 78.3 % 41-142

Surrogate: 1-Chlorooctadecane 74.7 % 37.6-147

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Celey D. Keene, Lab Director/Quality Manager





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**Analytical Results For:**

BBC International, Inc.  
 Cliff Brunson  
 P.O. Box 805  
 Hobbs NM, 88241  
 Fax To: (575) 397-0397

Received:	05/24/2018	Sampling Date:	05/23/2018
Reported:	05/31/2018	Sampling Type:	Soil
Project Name:	SRO STATE COM #060H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	COG - EDDY CO		

**Sample ID: SP 4 @ 6' (H801424-15)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	05/25/2018	ND	432	108	400	0.00	

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

BBC International, Inc.  
 Cliff Brunson  
 P.O. Box 805  
 Hobbs NM, 88241  
 Fax To: (575) 397-0397

Received:	05/24/2018	Sampling Date:	05/23/2018
Reported:	05/31/2018	Sampling Type:	Soil
Project Name:	SRO STATE COM #060H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	COG - EDDY CO		

**Sample ID: NORTH (H801424-16)**

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	05/25/2018	ND	1.70	85.2	2.00	2.11		
Toluene*	<0.050	0.050	05/25/2018	ND	1.70	85.1	2.00	3.26		
Ethylbenzene*	<0.050	0.050	05/25/2018	ND	1.76	88.1	2.00	0.591		
Total Xylenes*	<0.150	0.150	05/25/2018	ND	5.28	88.0	6.00	0.437		
Total BTEX	<0.300	0.300	05/25/2018	ND						

Surrogate: 4-Bromofluorobenzene (PID) 110 % 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	
Chloride	32.0	16.0	05/25/2018	ND	432	108	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	05/25/2018	ND	233	117	200	1.37	
DRO >C10-C28*	<10.0	10.0	05/25/2018	ND	225	113	200	1.48	
EXT DRO >C28-C36	<10.0	10.0	05/25/2018	ND					

Surrogate: 1-Chlorooctane 73.8 % 41-142

Surrogate: 1-Chlorooctadecane 69.7 % 37.6-147

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

BBC International, Inc.  
 Cliff Brunson  
 P.O. Box 805  
 Hobbs NM, 88241  
 Fax To: (575) 397-0397

Received:	05/24/2018	Sampling Date:	05/23/2018
Reported:	05/31/2018	Sampling Type:	Soil
Project Name:	SRO STATE COM #060H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	COG - EDDY CO		

**Sample ID: EAST (H801424-17)**

BTX 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	05/25/2018	ND	1.70	85.2	2.00	2.11		
Toluene*	<0.050	0.050	05/25/2018	ND	1.70	85.1	2.00	3.26		
Ethylbenzene*	<0.050	0.050	05/25/2018	ND	1.76	88.1	2.00	0.591		
Total Xylenes*	<0.150	0.150	05/25/2018	ND	5.28	88.0	6.00	0.437		
Total BTX	<0.300	0.300	05/25/2018	ND						

Surrogate: 4-Bromofluorobenzene (PID) 112 % 69.8-142

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	05/25/2018	ND	432	108	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	05/25/2018	ND	233	117	200	1.37	
DRO >C10-C28*	<10.0	10.0	05/25/2018	ND	225	113	200	1.48	
EXT DRO >C28-C36	<10.0	10.0	05/25/2018	ND					

Surrogate: 1-Chlorooctane 81.7 % 41-142

Surrogate: 1-Chlorooctadecane 78.1 % 37.6-147

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

BBC International, Inc.  
 Cliff Brunson  
 P.O. Box 805  
 Hobbs NM, 88241  
 Fax To: (575) 397-0397

Received:	05/24/2018	Sampling Date:	05/23/2018
Reported:	05/31/2018	Sampling Type:	Soil
Project Name:	SRO STATE COM #060H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	COG - EDDY CO		

**Sample ID: SOUTH (H801424-18)**

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	05/25/2018	ND	1.70	85.2	2.00	2.11		
Toluene*	<0.050	0.050	05/25/2018	ND	1.70	85.1	2.00	3.26		
Ethylbenzene*	<0.050	0.050	05/25/2018	ND	1.76	88.1	2.00	0.591		
Total Xylenes*	<0.150	0.150	05/25/2018	ND	5.28	88.0	6.00	0.437		
Total BTEx	<0.300	0.300	05/25/2018	ND						

Surrogate: 4-Bromofluorobenzene (PID) 106 % 69.8-142

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	05/25/2018	ND	432	108	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	05/25/2018	ND	233	117	200	1.37	
DRO >C10-C28*	<10.0	10.0	05/25/2018	ND	225	113	200	1.48	
EXT DRO >C28-C36	<10.0	10.0	05/25/2018	ND					

Surrogate: 1-Chlorooctane 85.9 % 41-142

Surrogate: 1-Chlorooctadecane 80.5 % 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:**

BBC International, Inc.  
 Cliff Brunson  
 P.O. Box 805  
 Hobbs NM, 88241  
 Fax To: (575) 397-0397

Received:	05/24/2018	Sampling Date:	05/23/2018
Reported:	05/31/2018	Sampling Type:	Soil
Project Name:	SRO STATE COM #060H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	COG - EDDY CO		

**Sample ID: WEST (H801424-19)**

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	05/25/2018	ND	1.70	85.2	2.00	2.11		
Toluene*	<0.050	0.050	05/25/2018	ND	1.70	85.1	2.00	3.26		
Ethylbenzene*	<0.050	0.050	05/25/2018	ND	1.76	88.1	2.00	0.591		
Total Xylenes*	<0.150	0.150	05/25/2018	ND	5.28	88.0	6.00	0.437		
Total BTEx	<0.300	0.300	05/25/2018	ND						

Surrogate: 4-Bromofluorobenzene (PID) 105 % 69.8-142

Chloride, SM4500CI-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	05/25/2018	ND	432	108	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	05/25/2018	ND	233	117	200	1.37	
DRO >C10-C28*	<10.0	10.0	05/25/2018	ND	225	113	200	1.48	
EXT DRO >C28-C36	<10.0	10.0	05/25/2018	ND					

Surrogate: 1-Chlorooctane 78.5 % 41-142

Surrogate: 1-Chlorooctadecane 74.7 % 37.6-147

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Celey D. Keene, Lab Director/Quality Manager

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### Notes and Definitions

QR-03	The RPD value for the sample duplicate or MS/MSD was outside of QC acceptance limits due to matrix interference. QC batch accepted based on LCS and/or LCSD recovery and/or RPD values.
QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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A handwritten signature in black ink, appearing to read "C. D. Keene", is written over a horizontal line.

Celey D. Keene, Lab Director/Quality Manager



**101 East Marland, Hobbs, NM 88240**  
**(505) 393-2326 FAX (505) 393-2476**

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

1 of 2

[illegible]

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Relinquished By: <i>Price Bryers</i>		Date: <i>5/28/18</i>	Received By: <i>[Signature]</i>	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
		Time: <i>5:00pm</i>		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:
Relinquished By: <i>[Signature]</i>		Date: <i>5-24-18</i>	Received By: <i>Jamara Eldredge</i>	REMARKS:	
		Time: <i>2:40</i>			
Delivered By: (Circle One) <i>-2.62</i>			Sample Condition	CHECKED BY:	
Sampler - UPS - Bus - Other: <i>Corrected -2.65</i>			Cool <input type="checkbox"/> Intact <input checked="" type="checkbox"/>	(Initials)	
			Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<i>TO-#25</i>	

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476



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

2 of 2

<b>Company Name:</b> BBC International, Inc.				<b>BILL TO</b>												<b>ANALYSIS REQUEST</b>																	
<b>Project Manager:</b> Cliff Brunson				<b>P.O. #:</b>												<div style="display: flex; flex-direction: column; align-items: center;"> <div>CL</div> <div>TPH EXT</div> <div>BTEX</div> </div>																	
<b>Address:</b> P.O. Box 805				<b>Company:</b> COG																													
<b>City:</b> Hobbs <b>State:</b> NM <b>Zip:</b> 88241				<b>Attn:</b> Becky Haskell																													
<b>Phone #:</b> 575-397-6388 <b>Fax #:</b> 575-397-0397				<b>Address:</b>																													
<b>Project #:</b> <b>Project Owner:</b> COG				<b>City:</b>																													
<b>Project Name:</b> SRO State Com #060H				<b>State:</b> <b>Zip:</b>																													
<b>Project Location:</b> Eddy County, NM				<b>Phone #:</b>																													
<b>Sampler Name:</b> Price Brunson				<b>Fax #:</b>																													
FOR LAB USE ONLY																																	
<b>Lab I.D.</b>		<b>Sample I.D.</b>		<b>(G)RAB OR (C)OMP.</b>		<b># CONTAINERS</b>		<b>MATRIX</b>				<b>PRESERV.</b>		<b>SAMPLING</b>																			
								GROUNDWATER WASTEWATER SOIL OIL SLUDGE OTHER :				ACID/BASE: ICE / COOL OTHER :		DATE TIME																			
H801424																																	
11		SP3 @ 1'												5/23/18 2:10 PM				✓ ✓ ✓															
12		SP3 @ 6'												5/23/18 2:40 PM				✓															
13		SP4 @ SURFACE												5/23/18 2:50 PM				✓															
14		SP4 @ 1'												5/23/18 3:20 PM				✓ ✓ ✓															
15		SP4 @ 6'												5/23/18 3:30 PM				✓															
16		NORTH												5/23/18 3:35 PM				✓ ✓ ✓															
17		EAST												5/23/18 3:40 PM				✓ ✓ ✓															
18		SOUTH												5/23/18 3:45 PM				✓ ✓ ✓															
19		WEST												5/23/18 3:50 PM				✓ ✓ ✓															

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<b>Relinquished By:</b>		<b>Date:</b> 5/23/18		<b>Received By:</b>		<b>Phone Result:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No		<b>Add'l Phone #:</b>	
<i>Cliff Brunson</i>		Time: 5:00p		<i>[Signature]</i>		<b>Fax Result:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No		<b>Add'l Fax #:</b>	
<b>Relinquished By:</b>		<b>Date:</b> 5-24-18		<b>Received By:</b>		<b>REMARKS:</b>			
<i>[Signature]</i>		Time: 2:40		<i>[Signature]</i>					
<b>Delivered By: (Circle One)</b>		<b>Sample Condition</b>		<b>CHECKED BY:</b>					
Cool Intact		Cool Intact		(Initials)					
Sampler - UPS - Bus - Other:		-2.6c		-2.65c		80715			

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476



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

---

June 05, 2018

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: SRO STATE COM #060H

Enclosed are the results of analyses for samples received by the laboratory on 06/05/18 14:13.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-17-10. 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, appearing to read "Mike Snyder", is written over a light blue horizontal line.

Mike Snyder For Celey D. Keene

Lab Director/Quality Manager



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

**Analytical Results For:**

BBC International, Inc.  
 Cliff Brunson  
 P.O. Box 805  
 Hobbs NM, 88241  
 Fax To: (575) 397-0397

Received:	06/05/2018	Sampling Date:	05/23/2018
Reported:	06/05/2018	Sampling Type:	Soil
Project Name:	SRO STATE COM #060H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	COG - EDDY CO		

**Sample ID: SP 2 @ 12' (H801525-01)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	06/05/2018	ND	432	108	400	0.00	

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Mike Snyder For 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 "Mike Snyder", is written over a horizontal line.

---

Mike Snyder For Celey D. Keene, Lab Director/Quality Manager





# **CARDINAL LABORATORIES**

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(505) 393-2326 FAX (505) 393-2476

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

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Page 4 of 4

<b>Company Name:</b> BBC International, Inc. <b>Project Manager:</b> Cliff Brunson <b>Address:</b> P.O. Box 805 <b>City:</b> Hobbs <b>State:</b> NM <b>Zip:</b> 88241 <b>Phone #:</b> 575-397-6388 <b>Fax #:</b> 575-397-0397 <b>Project #:</b> <b>Project Owner:</b> COG <b>Project Name:</b> SRO State Com #060H (5/3/18) <b>Project Location:</b> Eddy County, NM <b>Sampler Name:</b> Price Brunson				<b>BILL TO</b> <b>P.O. #:</b> <b>Company:</b> COG <b>Attn:</b> Becky Haskell <b>Address:</b> <b>City:</b> <b>State:</b> <b>Zip:</b> <b>Phone #:</b> <b>Fax #:</b>		<b>ANALYSIS REQUEST</b>													
<b>FOR LAB USE ONLY</b>  <b>Lab I.D.</b> H8D1525		<b>Sample I.D.</b> SP2@ 12'		(G/RAB OR (C)OMP. # CONTAINERS G 1	MATRIX GROUNDWATER WASTEWATER SOIL OIL SLUDGE OTHER : <input checked="" type="checkbox"/>	PRESERV ACID/BASE: ICE / COOL OTHER : <input checked="" type="checkbox"/>	SAMPLING DATE 5/23/18 TIME 1:40 pm	<input checked="" type="checkbox"/>											
PB 5/24/18																			

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 rendered by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

<b>Relinquished By:</b> Price Brunson <b>Date:</b> 5/23/18 <b>Time:</b> 5:30 pm	<b>Received By:</b> Heidi Benson <b>Date:</b> 5/23/18 <b>Time:</b> 2:05	<b>Phone Result:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No <b>Fax Result:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No <b>REMARKS:</b>
<b>Relinquished By:</b> #75	<b>Received By:</b>	
<b>Delivered By: (Circle One)</b> Sampler - UPS - Bus - Other: 4.4°C / 4.35°C	<b>Sample Condition</b> Cool Intact <input type="checkbox"/> Yes <input type="checkbox"/> No	<b>CHECKED BY:</b> (Initials)

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

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

MAY 04 2018

Form C-141  
Revised April 3, 2017

DISTRICT II ARTESIA, N.M. Copy to appropriate District Office in accordance with 19.15.29 NMAC.

## Release Notification and Corrective Action

NAB1813441720

## 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: SRO State Com #060H Battery	Facility Type: Flowline
Surface Owner: State	Mineral Owner: State
API No. 30-015-41741	

## LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
H	10	26S	28E	2,450	North	380	East	Eddy

Latitude 32.0582 Longitude -104.0677 NAD83

## NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: 6 bbl.	Volume Recovered: 0 bbl.
Source of Release: Flowline Rupture	Date and Hour of Occurrence: May 3, 2018 8:00 am	Date and Hour of Discovery: May 3, 2018 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 flowline rupture. Flowline was repaired.		
Describe Area Affected and Cleanup Action Taken.*		
The release was within a pasture. A vacuum truck was dispatched to remove all freestanding fluids. Concho will have the spill area sampled to delineate 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.		
Signature: <i>DeAnn Grant</i>	OIL CONSERVATION DIVISION	
Printed Name: DeAnn Grant	Approved by Environmental Specialist: <i>Mike Brando</i>	
Title: HSE Administrative Assistant	Approval Date: <i>5/9/18</i>	Expiration Date: <i>N/A</i>
E-mail Address: agrant@concho.com	Conditions of Approval: <i>See attached</i>	Attached <input checked="" type="checkbox"/> <i>2004740</i>
Date: May 4, 2018	Phone: 432-253-4513	

\* Attach Additional Sheets If Necessary



Operator/Responsible Party,

The OCD has received the form C-141 you provided on 5/4/2018 regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 2RP-4740 has been assigned. **Please refer to this case number in all future correspondence.**

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

*The responsible person shall complete division-approved corrective action for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC. [emphasis added]*

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. **As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District 2 office in ARTESIA on or before 6/4/2018.** If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

- Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C<sub>6</sub> thru C<sub>36</sub>), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.
- Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C<sub>6</sub> thru C<sub>36</sub>), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.
- Nominal detection limits for field and laboratory analyses must be provided.
- Composite sampling is not generally allowed.
- Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted



for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

- Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.

- If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.

- Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.

**Jim Griswold**  
OCD Environmental Bureau Chief  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
505-476-3465  
jim.griswold@state.nm.us

**Bratcher, Mike, EMNRD**

---

**From:** DeAnn Grant <agrant@concho.com>  
**Sent:** Friday, May 4, 2018 9:04 AM  
**To:** Bratcher, Mike, EMNRD; rmann@slo.state.nm.us  
**Cc:** Weaver, Crystal, EMNRD; Sheldon Hitchcock; Dakota Neel; Rebecca Haskell; DeAnn Grant  
**Subject:** (Initial C-141) SRO State Com #060H Battery (30-015-41741) 5-3-2018  
**Attachments:** (Initial C-141) SRO State Com #060H Battery (30-015-41741) 5-3-2018.pdf

Mr. Bratcher/Mr. Mann,

Please find the attached Initial C-141 for your consideration. If you have any questions or concerns please contact me.

Thank you,

**DeAnn Grant**

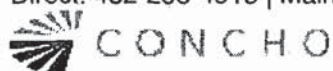
HSE Administrative Assistant

[agrant@concho.com](mailto:agrant@concho.com)

COG Operating LLC

600 W Illinois Avenue | Midland, TX 79701

Direct: 432-253-4513 | Main: 432.683.7443



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# APPENDIX VI



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

---

October 17, 2018

HENRYETTA PRICE

HRL COMPLIANCE SOLUTIONS, INC.

2385 F 1/2 ROAD

GRAND JUNCTION, CO 81505

RE: SRO #60

Enclosed are the results of analyses for samples received by the laboratory on 10/11/18 17:20.

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, flowing style.

Celey D. Keene

Lab Director/Quality Manager



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

**Analytical Results For:**

HRL COMPLIANCE SOLUTIONS, INC.  
 HENRYETTA PRICE  
 2385 F 1/2 ROAD  
 GRAND JUNCTION CO, 81505  
 Fax To:

Received: 10/11/2018  
 Reported: 10/17/2018  
 Project Name: SRO #60  
 Project Number: NONE GIVEN  
 Project Location: COG

Sampling Date: 10/10/2018  
 Sampling Type: Soil  
 Sampling Condition: \*\* (See Notes)  
 Sample Received By: Tamara Oldaker

**Sample ID: S 2 - EAST (H802927-01)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	192	16.0	10/16/2018	ND	400	100	400	3.92	

**Sample ID: S 2 - SOUTH (H802927-02)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	176	16.0	10/16/2018	ND	400	100	400	3.92		

**Sample ID: S 2 - WEST (H802927-03)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	16.0	10/16/2018	ND	400	100	400	3.92	

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



---

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---

### Notes and Definitions

QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

---

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\*=Accredited Analyte

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

---

Caley D. Keene, Lab Director/Quality Manager





**(575) 393-2326 FAX (575) 393-2476**

[illegible]



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

---

October 17, 2018

HENRYETTA PRICE

HRL COMPLIANCE SOLUTIONS, INC.

2385 F 1/2 ROAD

GRAND JUNCTION, CO 81505

RE: SRO #60

Enclosed are the results of analyses for samples received by the laboratory on 10/11/18 17:30.

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Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

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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:**

HRL COMPLIANCE SOLUTIONS, INC.  
 HENRYETTA PRICE  
 2385 F 1/2 ROAD  
 GRAND JUNCTION CO, 81505  
 Fax To:

Received: 10/11/2018  
 Reported: 10/17/2018  
 Project Name: SRO #60  
 Project Number: NONE GIVEN  
 Project Location: COG

Sampling Date: 10/10/2018  
 Sampling Type: Soil  
 Sampling Condition: \*\* (See Notes)  
 Sample Received By: Tamara Oldaker

**Sample ID: S 2 - NORTH (H802928-01)****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>48.0</b>	16.0	10/16/2018	ND	400	100	400	3.92	

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



---

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---

### Notes and Definitions

QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

---

Cardinal Laboratories

\*=Accredited Analyte

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

---

Caley D. Keene, Lab Director/Quality Manager

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

Jonathan@hrcomp.com  
hrprice@hrcomp.com





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

---

October 17, 2018

JENNIFER KNOWLTON  
HRL COMPLIANCE SOLUTIONS, INC.  
2385 F 1/2 ROAD  
GRAND JUNCTION, CO 81505

RE: SRO #60

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Sincerely,

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Celey D. Keene  
Lab Director/Quality Manager





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

**Analytical Results For:**

HRL COMPLIANCE SOLUTIONS, INC.  
 JENNIFER KNOWLTON  
 2385 F 1/2 ROAD  
 GRAND JUNCTION CO, 81505  
 Fax To:

Received: 10/11/2018  
 Reported: 10/17/2018  
 Project Name: SRO #60  
 Project Number: NONE GIVEN  
 Project Location: COG

Sampling Date: 10/10/2018  
 Sampling Type: Soil  
 Sampling Condition: \*\* (See Notes)  
 Sample Received By: Tamara Oldaker

**Sample ID: NORTH (H802929-01)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	208	16.0	10/16/2018	ND	400	100	400	3.92	

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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---

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Cardinal Laboratories

\*=Accredited Analyte

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

---

Celey D. Keene, Lab Director/Quality Manager



(575) 393-2326 FAX (575) 393-2476

Released to Imaging: 11/23/2022 9:50:01 AM

**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**  
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**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

CONDITIONS  
  
Action 161184

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 161184
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

Created By	Condition	Condition Date
amaxwell	None	11/23/2022