

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Thursday, April 5, 2018 12:20 PM
To: 'Gonzales, Clair'; Weaver, Crystal, EMNRD; Tucker, Shelly
Cc: Rebecca Haskell; Dakota Neel; Sheldon Hitchcock; Robert McNeill; Tavarez, Ike; Aaron Lieb
Subject: RE: COG Jenkins B Federal Tank Battery Work Plan Approval Request (2RP-4303)

RE: COG * Jenkins B Fed Tank Battery * **2RP-4303** * DOR: 7/11/17

All,

The proposal for remediation of the above referenced release is approved. Federal sites will require like approval from BLM. Please advise once remedial activities have been scheduled, and Include the deferral request in the closure report.

Thank you,

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Gonzales, Clair <Clair.Gonzales@tetrattech.com>
Sent: Friday, February 16, 2018 8:34 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Tucker, Shelly <stucker@blm.gov>
Cc: Rebecca Haskell <RHaskell@concho.com>; Dakota Neel <DNeel2@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; Robert McNeill <RMcNeill@concho.com>; Tavarez, Ike <Ike.Tavarez@tetrattech.com>; Aaron Lieb <ALieb@concho.com>
Subject: COG Jenkins B Federal Tank Battery Work Plan Approval Request (2RP-4303)

Good Morning,

Attached is the work plan for the above referenced site located in Eddy County, New Mexico. Once approved, COG will implement the proposed work plan. Let me know if you have any questions or concerns.

Thank you,

Clair Gonzales

Clair Gonzales | Project Manager

Phone: 432.687.8123 | Mobile 432.260.8634 | Fax: 432.682.3946

clair.gonzales@tetrattech.com

Tetra Tech | Complex World, CLEAR SOLUTIONS™

4000 N. Big Spring | Midland, TX 79705 | www.tetrattech.com

PLEASE NOTE: This message, including any attachments, may include privileged, confidential and/or inside information. Any distribution or use of this communication by anyone other than the intended recipient is strictly prohibited and may be unlawful. If you are not the intended recipient, please notify the sender by replying to this message and then delete it from your system.

**HRL**
COMPLIANCE
SOLUTIONSP.O. Box 1708 • Artesia, NM 88211
www.hrlcomp.com

August 10, 2018

Mike Bratcher
NMOCD District II
811 S. First Street
Artesia, NM 88210Bureau of Land Management
Henryetta Price
620 E Greene Street
Carlsbad, New Mexico 88220SUBJECT: FINAL CLOSURE PLAN FOR THE INCIDENT AT THE Jenkins B Federal Tank Battery (2RP-4303),
Section 17, Township 17 South, Range 30 East, Eddy County, New Mexico

Mr. Bratcher:

On behalf of COG Operating, LLC, HRL Compliance Solutions, Inc (HRL) is pleased to submit the attached final closure report summarizing the finding and closure actions located on the Jenkins B Federal Tank Battery release. The purpose of the report is to obtain approval from the New Mexico Oil Conservation Division (NMOCD) for the remediation and closure of the release that occurred on July 11, 2017. Table 1 below summarizes information regarding the release.

1.0 Background

The release at the Jenkins B Federal Tank Battery was due to a failed pipe fitting at the header within the bermed containment as outlined in the NMOCD C-141 report (Appendix A). All released liquids remained within the perimeter of the berm impacting an area measuring approximately 30' X 90'. All free standing fluids were removed with a vacuum truck. Samples were collected through the use of a Hand Auger and an Air Rotary Rig for delineation purposes as stated in the approved work plan.

2.0 Site Ranking and Land Jurisdiction

The release site is located approximately 0.9 miles northwest of Loco Hills with an approximate elevation of 3,675 feet above sea level. Based on the information provided by the New Mexico Office of the State Engineer, there are no wells listed for Section 17. Therefore, groundwater information was based on the information found on the Chevron Texaco Ground water Trend Map (2005) which estimates depth to groundwater at a depth of 250'-275' below ground surface (bgs).

Recommended Remediation Action Levels (RRALs) are determined by the site ranking according to the NMOCD *Guidelines for Remediation of Leaks, Spills, and Releases* (1993). The site ranking for this location was 0 as documented in the approved work plan.

Concho | Jenkins B Federal Tank Battery | 8/10/2018

INNOVATIVE SOLUTIONS DELIVERED

**Table 1: Release Information and Site Ranking**

Name	Jenkins B Federal Tank Battery
Company	COG Operating, LLC
RP Number	2RP-4303
API Number	N/A
Location	32.829856, -103.994967
Estimated Date of Release	7/11/2017
Date Reported to NMOCD	7/11/2017
Land Owner	Federal
Reported to	OCD/BLM
Source of Release	Pipe tee failure at header
Released Material	Oil
Released Volume	20 bbls oil
Recovered Volume	18 bbls oil
Net Release Volume	2 bbls oil
Nearest Waterway	> 1 mile
Depth to Groundwater	250 - 275 feet bgs
Nearest Domestic Water Source	> 1 mile
NMOCD Ranking	0
Response Date	7/11/2017

3.0 Assessment

On August 8, 2018, after receiving one call clearance, HRL field personnel supervised the excavation of the area in accordance to the approved work plan. The area labeled BH-1 was excavated in a 30 feet by 30 feet area, with a depth of 3.5-4 feet. The depth was dependent on surrounding equipment and the concern over wall cave in around equipment. The areas of BH-2 was excavated to a depth of 2.5 feet with an approximate surface area measuring 7 feet by 50 feet. The shallow excavation in the area was due in part to a dense formation at the 2.5' depth and the safety concern of wall cave in due to penetration of this formation. All excavations were performed within a safe distance from the surrounding equipment and structures. All excavated areas were lined with a 20 mil liner prior to backfill (Appendix B). Areas not excavated within the release area will be deferred until final abandonment of the location due to inaccessibility and safety concerns with excavation in and around the equipment.

4.0 Conclusion

All excavated material was disposed at an NMOCD approved facility. The excavated areas have been back filled to its original state with appropriate material from a licensed caliche pit. No further remedial activities are recommended.



5.0 Revegetation Plan

The facility is still in production and requires no vegetation plan. All excavation occurred within the active pad location.

6.0 Scope and Limitations

The scope of HRL's services consist of performing site characterization and remediation, verification of release stabilization, regulatory liaison, and preparation of this work plan. All work has been performed in accordance with generally accepted professional environmental consulting practices for oil and gas releases in the Permian Basin in New Mexico.

If there are any questions regarding this report, please contact Jennifer Knowlton at 505-238-3588.

Submitted by:
HRL Compliance Solutions, Inc

Jennifer Knowlton
Regional Manager - Permian

Attachments:

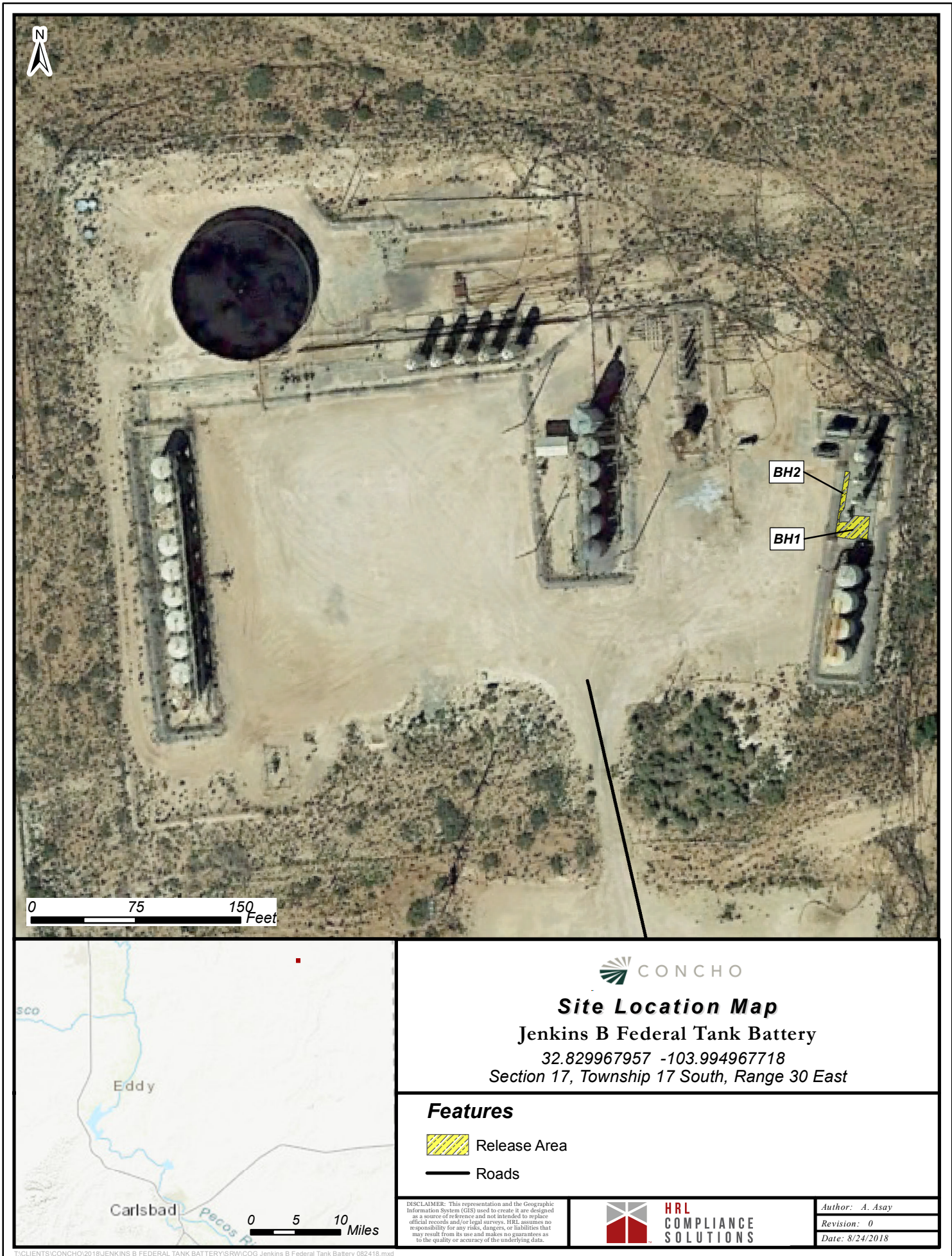
Figure 1: Site Location Map

Appendix A: Form C141 Final

Appendix B: Photos



Figure 1:
Site Location Map





Appendix A: Form C141 Final

Appendix A: Form C141 Final

Concho | Jenkins B Federal Tank Battery | 8/10/2018

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 April 3, 2017
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 McNeil
Address: 600 West Illinois Avenue, Midland TX 79701	Telephone No. 432-683-7443
Facility Name: Jenkins B Federal Tank Battery	Facility Type: Tank Battery
Surface Owner: Federal	Mineral Owner: Federal
API No.	

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
N	17	17S	30E		South		East	Eddy

Latitude 32.829856 Longitude -103.994967 NAD83

NATURE OF RELEASE

Type of Release: Oil	Volume of Release: 20 bbl. Oil	Volume Recovered: 18 bbl. Oil
Source of Release: Pipefitting	Date and Hour of Occurrence: July 11, 2017 6:30am	Date and Hour of Discovery: July 11, 2017 6:30am
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.*

REVIEWED

By Brittany Hall at 2:16 pm, Nov 30, 2022

Describe Cause of Problem and Remedial Action Taken.*


This release was due to a failure of a pipe tee at the header. The tee was removed and replaced.

Describe Area Affected and Cleanup Action Taken.*

The release occurred with the unlined berm. A vacuum truck was dispatched to remove all free standing fluids. Concho will have the spill area evaluated for any possible impact from the release and we will present a remediation plan to the NMOCD for approval prior to any significant remediation activities.

The site was remediated per the OCD approved work plan. Certain areas are deferred for action due to the proximity of active equipment.

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: 		OIL CONSERVATION DIVISION Deferral approved. This document will be uploaded as information only. A final report and a closure/final C-141 will need to be submitted through the OCD permitting when remediation is completed at the time when equipment is removed during other operations, or when the well or facility is plugged or abandoned, whichever comes first. Incident will remain in "Closure Not Approved" status until final report/C-141 is received and approved by NMOCD.
Printed Name: Rebecca Haskell		
Title: Senior HSE Coordinator		
E-mail Address: rhaskell@concho.com		
Date: August 27, 2018 Phone: (432) 683-7443		

* Attach Additional Sheets If Necessary



Appendix B: Photos





Concho | Jenkins B Federal Tank Battery | 8/10/2018

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 162718

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 162718
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

Created By	Condition	Condition Date
bhall	Deferral approved. This document will be uploaded as information only. A final report and a closure/final C-141 will need to be submitted through the OCD permitting when remediation is completed at the time when equipment is removed during other operations, or when the well or facility is plugged or abandoned, whichever comes first. Incident will remain in "Closure Not Approved" status until final report/C-141 is received and approved by NMOCd.	11/30/2022
bhall	2RP-4303 closed. Please refer to incident #NAB1720539749 in all future communication.	11/30/2022