

# Closure Report

## Site Description

Site Name:	King Cobra 2 State #001H
Company:	COG Operating LLC
Legal Description:	U/L A, Section 2, T19S, R34E
County:	Lea County, NM
GPS Coordinates:	N 32.69609° W 103.52354°

## Release Data

Date of Release:	02/17/2016 and 07/26/2016
Type of Release:	Oil
Source of Release:	Gasket failure, Dump valve failure
Volume of Release:	20 bbls, 6 bbls
Volume Recovered:	15 bbls, 5 bbls

## Remediation Specifications

Remediation Parameters:	Excavate the leak area around SP1 to a depth of 6 inches. Backdrag the overspray area around SP2. Backfill the site with clean soils.	
Remediation Activities:	11/21/2016 to 11/21/2016	
Plan Sent to OCD:	11/04/2016	Email from Cliff Brunson to Kristen Lynch
OCD Approval of Plan:	11/10/2016	Email from Kristen Lynch to Cliff Brunson
Plan Sent to BLM:	n/a	n/a
BLM Approval of Plan:	n/a	n/a

## Supporting Documentation

Initial C-141	Signed 08/01/2016
Final C-141	Signed 11/28/2016
Site Diagram	October 2016
Groundwater Plot	75'-100'
TOPO Maps	October 2016
Lab Summary	10/03/2016
Lab Analysis	10/03/2016
Correspondence	Request and approval of remediation plan via email

## Request for Closure

Based on the completion of the remediation plan as agreed upon, BBC International requests closure approval from NMOCD.

Cliff Brunson, President of BBC International Inc.

11/30/2016

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

**RECEIVED**

By JKeyes at 10:58 am, Mar 02, 2016

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

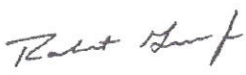

Name of Company: COG Operating LLC	Contact: Robert McNeill
Address: 600 West Illinois Avenue, Midland TX 79701	Telephone No. 432-230-0077
Facility Name: KING COBRA 2 STATE #001H	Facility Type: Battery
Surface Owner:	Mineral Owner: State
API No. 30-025-40388	

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
A	2	19S	34E	460	North	460	East	Lea

Latitude 32.6957741 Longitude -103.5239563

**NATURE OF RELEASE**

Type of Release: Oil	Volume of Release: 20 bbls Oil	Volume Recovered: 15 bbls Oil
Source of Release: Gasket failure	Date and Hour of Occurrence: 2/17/2016 6:49 am	Date and Hour of Discovery: 2/17/2016 6:49 am
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 gasket on a FWKO. Vacuum trucks were dispatched to recover standing fluid.		
Describe Area Affected and Cleanup Action Taken.* The majority of the release was contained within the lined facility. The adjacent pasture was impacted by a spray of oil. 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: Robert Grubbs	Approved by Environmental Specialist: 	
Title: Senior Environmental Coordinator	Approval Date: 03/02/2016	Expiration Date: 05/02/2016
E-mail Address: rgrubbs@concho.com	Conditions of Approval: Discrete site samples only. Delineate and remediate per NMOCD guidelines.	
Date: March 2, 2016 Phone: 432-230-0077	Attached <input type="checkbox"/> IRP 4196	

\* Attach Additional Sheets If Necessary.

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

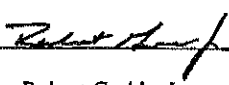
Name of Company:	COG Operating LLC	Contact:	Robert McNeill
Address:	600 West Illinois Avenue, Midland TX 79701	Telephone No.	432-685-4304
Facility Name:	KING COBRA 2 STATE #001H	Facility Type:	Flare
Surface Owner:	State	Mineral Owner:	API No. 30-025-40388

### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
A	2	19S	34E	460	North	460	East	Lea

Latitude 32.6957741 Longitude -103.5239563

### NATURE OF RELEASE

Type of Release:	Oil	Volume of Release:	6bbls Oil	Volume Recovered:	05bbls Oil
Source of Release:	Flare	Date and Hour of Occurrence:	7/26/2016 6:00 pm	Date and Hour of Discovery:	7/26/2016 6:00 pm
Was Immediate Notice Given?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required				
By Whom?	If YES, To Whom?				
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
Date and Hour:					
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 oil dump valve that failed causing the fluid to go to the flare. Replaced the dump valve on the FWKO.					
Describe Area Affected and Cleanup Action Taken.*					
A 28'X26' in the adjacent pasture was impacted by a spray of oil 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:					
Printed Name:	Robert Grubbs Jr.				
Title:	Senior Environmental Coordinator				
E-mail Address:	rgrubbs@concho.com				
Date:	August 1, 2016				
Phone:	432-685-4304				
			OIL CONSERVATION DIVISION		
			Approved by Environmental Specialist:		
			Approval Date:		
			Expiration Date:		
			Conditions of Approval:		
			Attached <input type="checkbox"/>		

\* Attach Additional Sheets If Necessary

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	Contact: Robert McNeill
Address: 600 West Illinois Avenue, Midland, TX 79701	Telephone No. 432-685-4304
Facility Name: King Cobra 2 State #001H	Facility Type: Battery

Surface Owner: State	Mineral Owner: State	API No. 30-025-40388
----------------------	----------------------	----------------------

### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
A	2	19S	34E	460	North	460	East	Lea County, NM

Latitude N 32.69609° Longitude W 103.52354°

### NATURE OF RELEASE

Type of Release: Oil	Volume of Release: 20 bbls	Volume Recovered: 15 bbls
Source of Release: Gasket failure	Date and Hour of Occurrence 02/17/2016 @ 6:49 am	Date and Hour of Discovery 02/17/2016 @ 6:49 am
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.\*

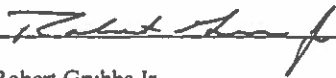

Describe Cause of Problem and Remedial Action Taken.\*

This release was caused by a gasket on a FWKO. Vacuum trucks were dispatched to recover standing fluid.

Describe Area Affected and Cleanup Action Taken.\*

The majority of the release was contained within the lined facility. The adjacent pasture was impacted by a spray of oil. The site was sampled and a remediation plan was created. Remediation was completed in accordance with the remediation plan approved by Kristen Lynch of NMOCD via email on 11/10/2016.

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: Robert Grubbs Jr		Approved by Environmental Specialist: 	
Title: Senior Environmental Coordinator		Approval Date: 12/1/2022	Expiration Date:
E-mail Address: rgrubbs@concho.com		Conditions of Approval:	
Date: November 28, 2016 Phone: (432) 683-7443		Attached <input type="checkbox"/>	

\* Attach Additional Sheets If Necessary



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	Contact: Robert McNeill
Address: 600 West Illinois Avenue, Midland, TX 79701	Telephone No. 432-685-4304
Facility Name: King Cobra 2 State #001H	Facility Type: Flare
Surface Owner: State	Mineral Owner: State
API No. 30-025-40388	

### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
A	2	19S	34E	460	North	460	East	Lea County, NM

Latitude N 32.69609° Longitude W 103.52354°

### NATURE OF RELEASE

Type of Release: Oil	Volume of Release: 6 bbls	Volume Recovered: 5 bbls
Source of Release: Failure of the oil dump valve caused fluid to go to the flare	Date and Hour of Occurrence 07/26/2016 @ 6:00 pm	Date and Hour of Discovery 07/26/2016 @ 6:00 pm
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.\*

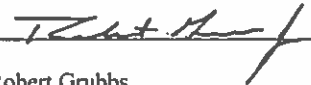

Describe Cause of Problem and Remedial Action Taken.\*

This release was caused by failure of the oil dump valve, causing oil to go to the flare. A vacuum truck recovered 5 bbls of oil and the dump valve on the FWKO was replaced.

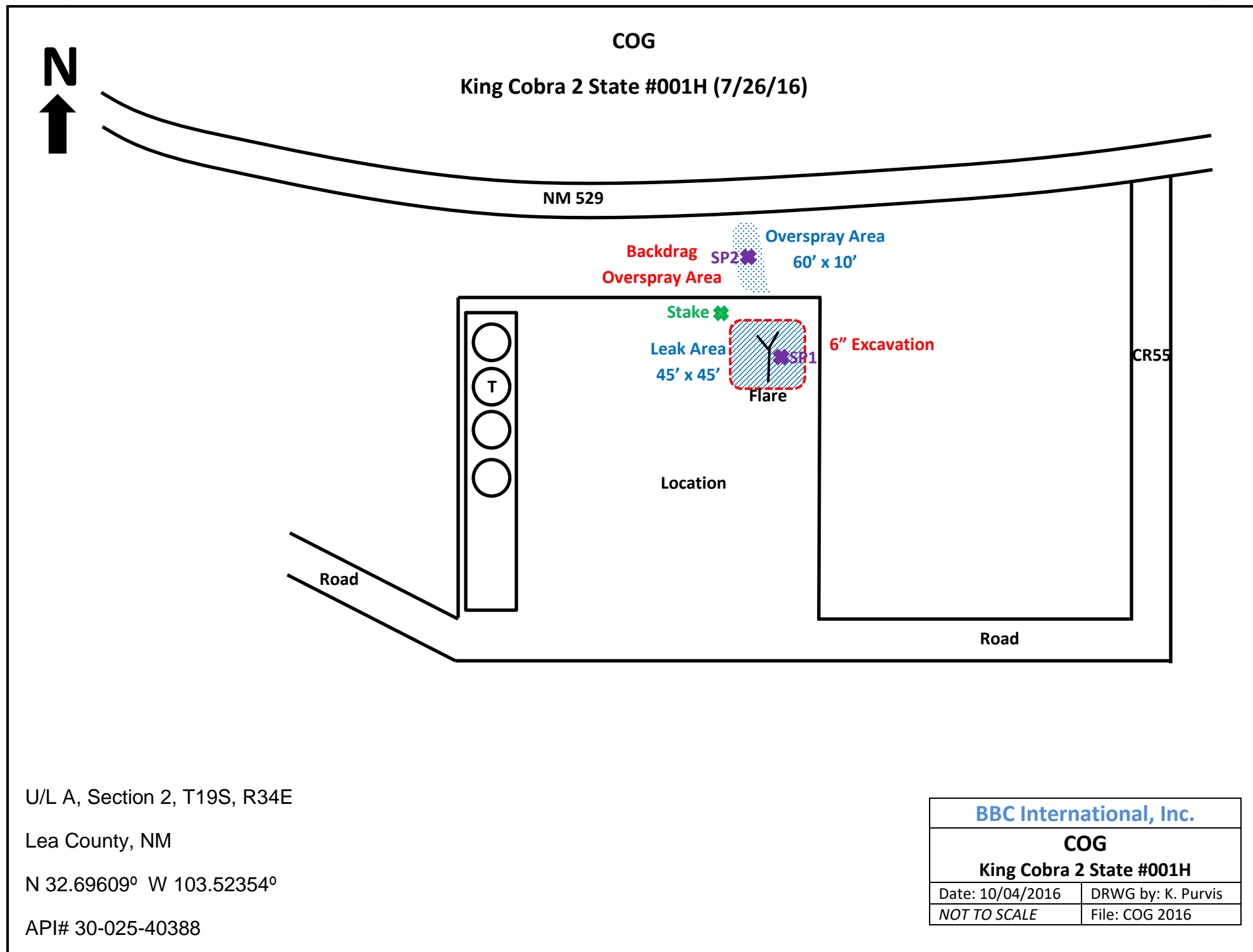
Describe Area Affected and Cleanup Action Taken.\*

The affected area included a 28' x 26' area in the adjacent pasture. The site was sampled and a remediation plan was created. Remediation was completed in accordance with the remediation plan approved by Kristen Lynch of NMOCD via email on 11/10/2016.

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: Robert Grubbs		Approved by Environmental Specialist: 	
Title: Senior Environmental Coordinator		Approval Date: 12/1/2022	Expiration Date:
E-mail Address: rgrubbs@concho.com		Conditions of Approval:	
Date: November 28, 2016 Phone: (432) 683-7443		Attached <input type="checkbox"/>	

\* Attach Additional Sheets If Necessary



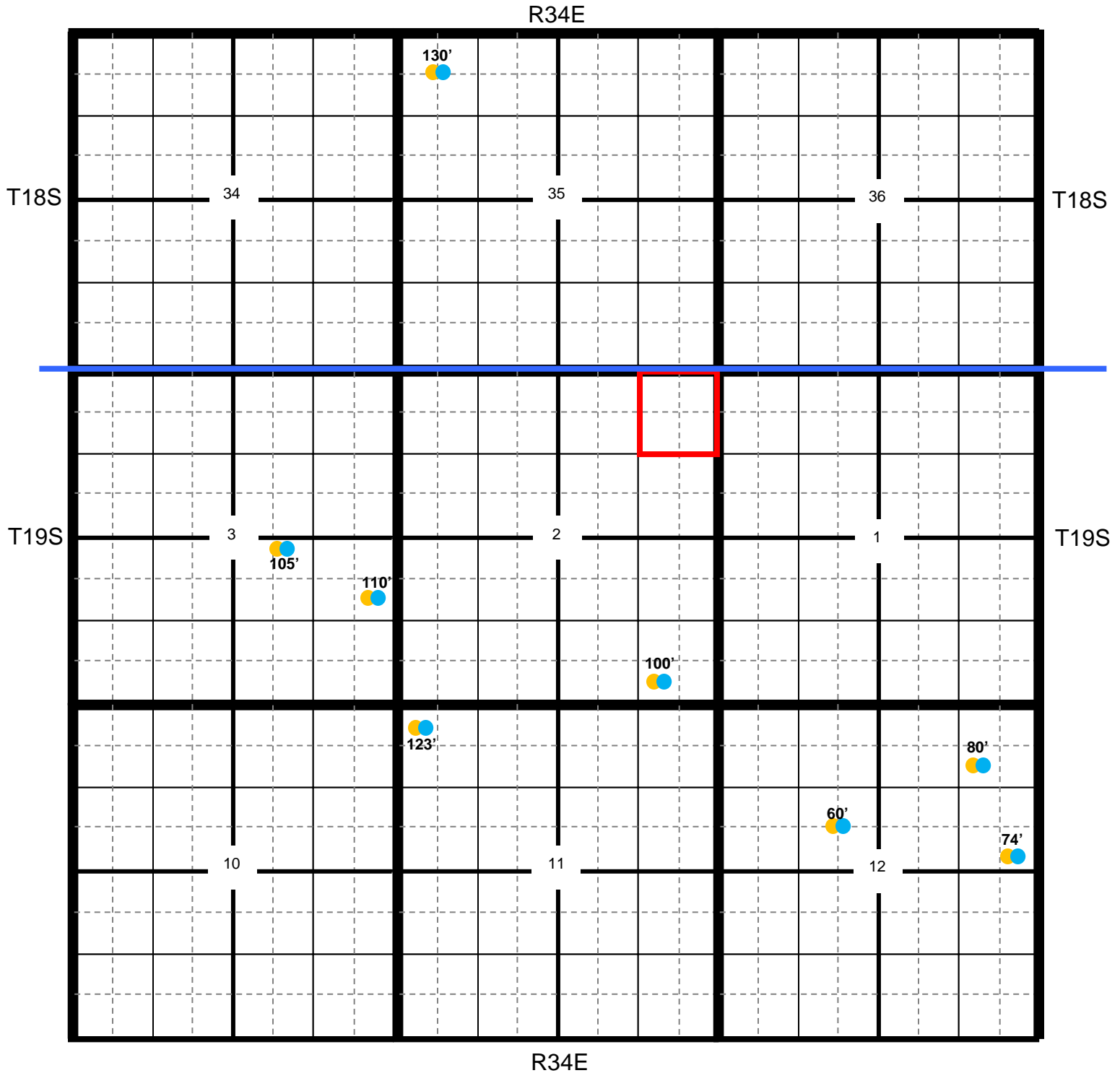


## Groundwater Plot

## COG King Cobra 2 State #001H

County  
LeaUnit Letter  
ASection  
2Township  
19SRange  
34E

Trend Map 75'-100'



\* Location

OCD

USGS

SEO

All Databases

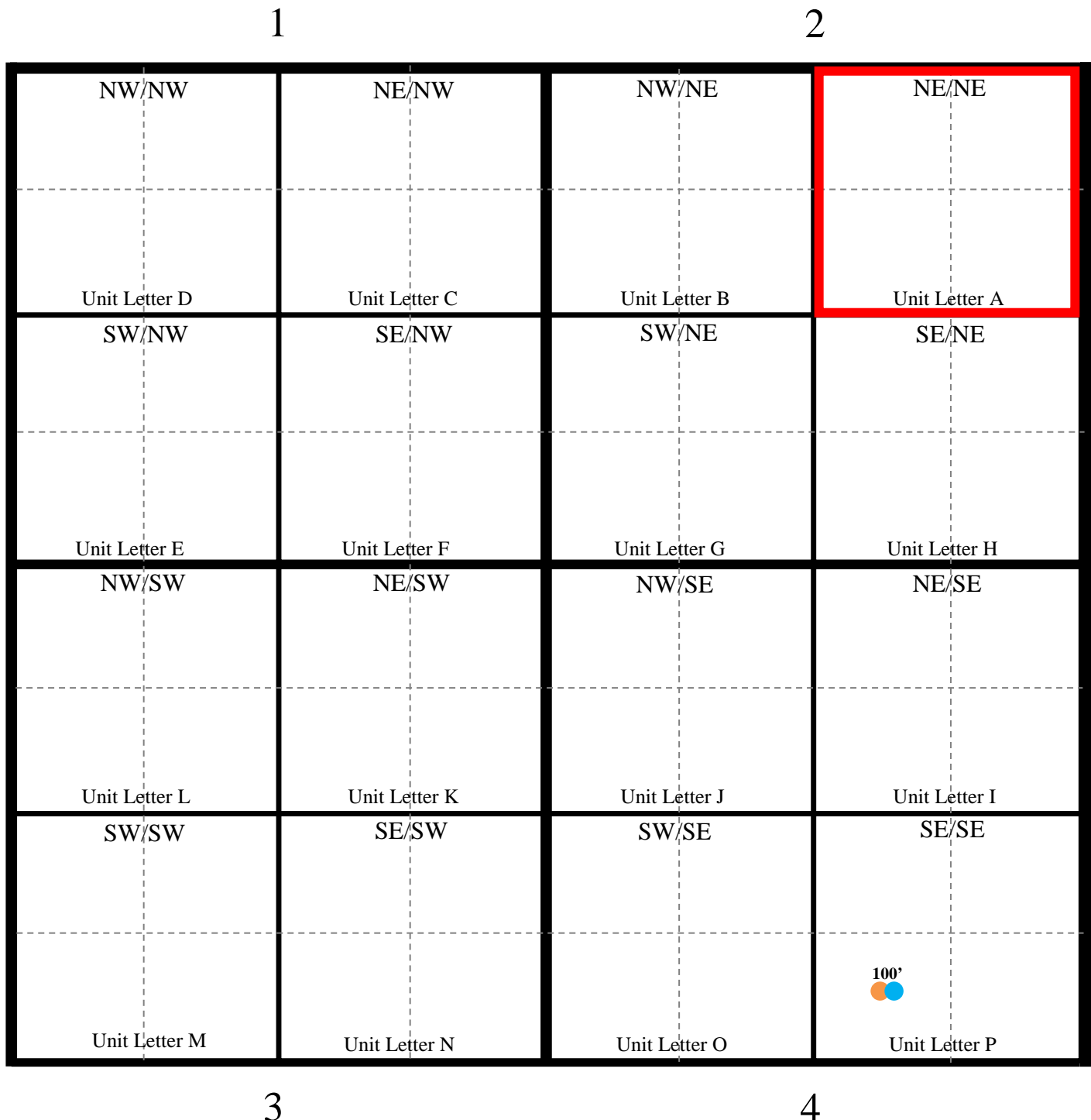


## Section Quarters

## COG King Cobra 2 State #001H

<b>County</b>	<b>Unit Letter</b>	<b>Section</b>	<b>Township</b>	<b>Range</b>
Lea	A	2	19S	34E

## Trend Map 75'-100'



\* Location

● OCD

● USGS

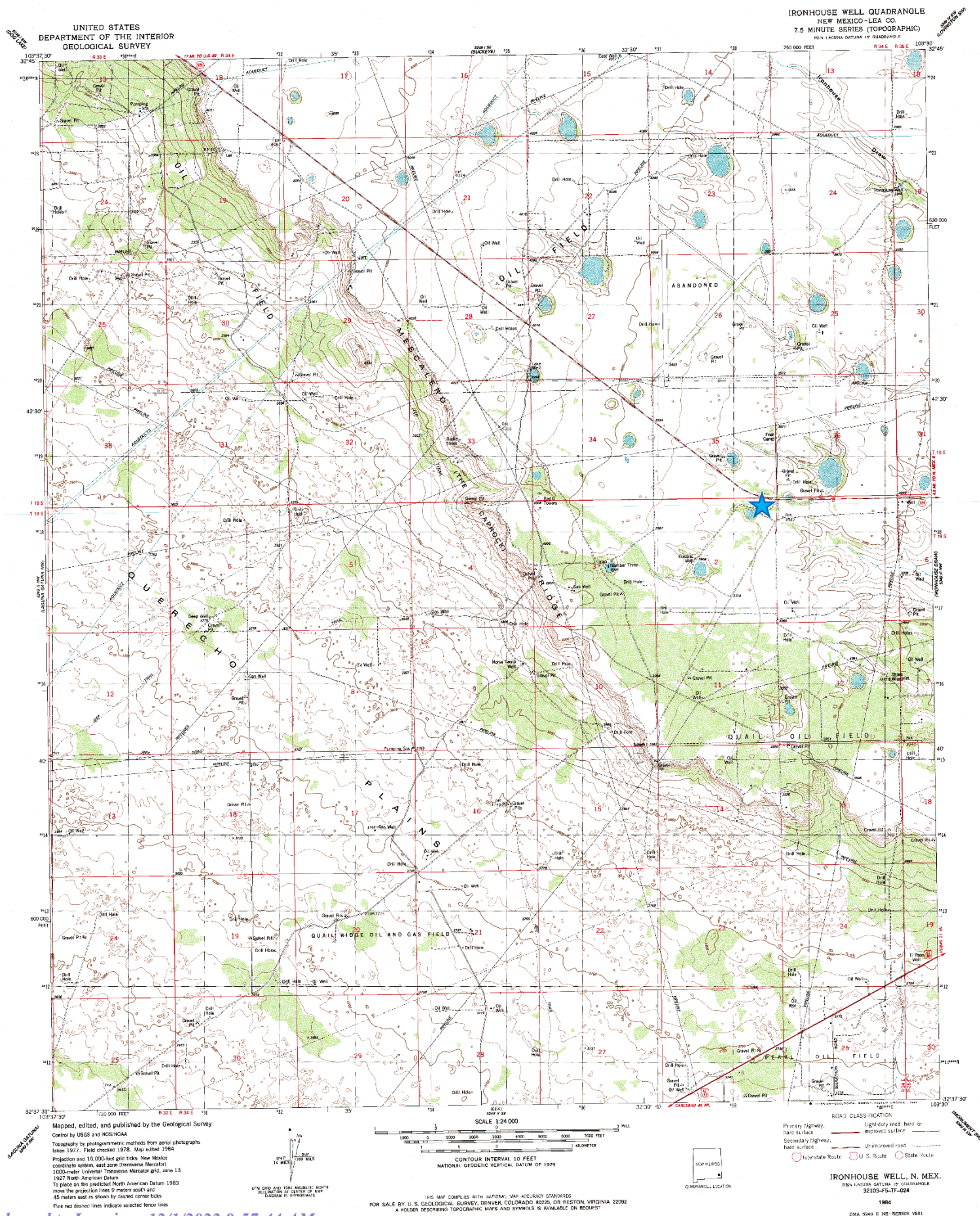
● SEO

● All Databases



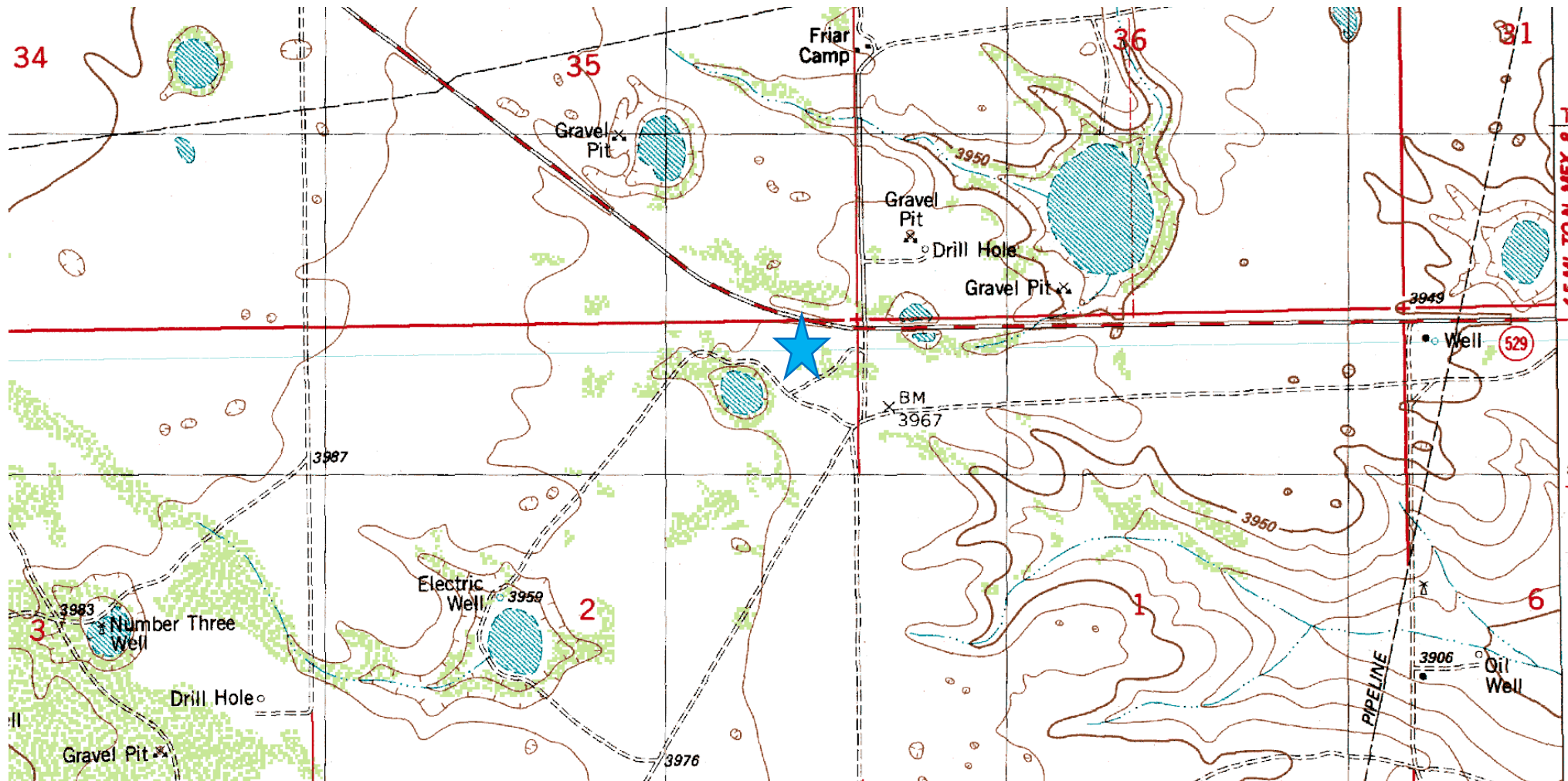
COG

## King Cobra 2 State #001H



COG

# King Cobra 2 State #001H





**Laboratory Analytical Results Summary  
King Cobra 2 State #001H**

		Sample	SP1 @ SURFACE	SP1 @ 1'	SP1 @ 2'
Analyte	Method	Date	10/3/16	10/3/16	10/3/16
			mg/Kg	mg/Kg	mg/Kg
<b>Benzene</b>	BTEX 8021B		<0.050	<0.050	<0.050
<b>Toluene</b>	BTEX 8021B		<0.050	<0.050	<0.050
<b>Ethylbenzene</b>	BTEX 8021B		<b>0.133</b>	<0.050	<0.050
<b>Total Xylenes</b>	BTEX 8021B		<b>0.312</b>	<0.150	<0.150
<b>Total BTEX</b>	BTEX 8021B		<b>0.445</b>	<0.300	<0.300
<b>GRO</b>	TPH 8015M		<50.0	<10.0	<10.0
<b>DRO</b>	TPH 8015M		<b>2080</b>	<10.0	<10.0

		Sample	SP2 @ SURFACE	SP2 @ 1'	SP2 @ 2'
Analyte	Method	Date	10/3/16	10/3/16	10/3/16
			mg/Kg	mg/Kg	mg/Kg
<b>Benzene</b>	BTEX 8021B		<0.050	<0.050	<0.050
<b>Toluene</b>	BTEX 8021B		<0.050	<0.050	<0.050
<b>Ethylbenzene</b>	BTEX 8021B		<0.050	<0.050	<0.050
<b>Total Xylenes</b>	BTEX 8021B		<0.150	<0.150	<0.150
<b>Total BTEX</b>	BTEX 8021B		<0.300	<0.300	<0.300
<b>GRO</b>	TPH 8015M		<10.0	<10.0	<10.0
<b>DRO</b>	TPH 8015M		<b>243</b>	<b>256</b>	<10.0



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

---

October 13, 2016

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: KING COBRA 2 STATE #001H

Enclosed are the results of analyses for samples received by the laboratory on 10/06/16 16:35.

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,

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:	10/06/2016	Sampling Date:	10/03/2016
Reported:	10/13/2016	Sampling Type:	Soil
Project Name:	KING COBRA 2 STATE #001H	Sampling Condition:	Cool & Intact
Project Number:	COG	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

**Sample ID: SP 1 @ SURFACE (H602258-01)**

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	10/11/2016	ND	2.19	109	2.00	0.609	
Toluene*	<0.050	0.050	10/11/2016	ND	2.24	112	2.00	1.35	
Ethylbenzene*	<b>0.133</b>	0.050	10/11/2016	ND	2.18	109	2.00	1.08	
<b>Total Xylenes*</b>	<b>0.312</b>	0.150	10/11/2016	ND	6.58	110	6.00	1.07	
<b>Total BTEX</b>	<b>0.445</b>	0.300	10/11/2016	ND					

Surrogate: 4-Bromofluorobenzene (PID) 115 % 73.6-140

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<50.0	50.0	10/08/2016	ND	185	92.3	200	5.29	
<b>DRO &gt;C10-C28</b>	<b>2080</b>	50.0	10/08/2016	ND	199	99.4	200	0.107	

Surrogate: 1-Chlorooctane 84.4 % 35-147

Surrogate: 1-Chlorooctadecane 134 % 28-171

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:**

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

Received:	10/06/2016	Sampling Date:	10/03/2016
Reported:	10/13/2016	Sampling Type:	Soil
Project Name:	KING COBRA 2 STATE #001H	Sampling Condition:	Cool & Intact
Project Number:	COG	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

**Sample ID: SP 1 @ 1' (H602258-02)**

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	10/11/2016	ND	2.19	109	2.00	0.609		
Toluene*	<0.050	0.050	10/11/2016	ND	2.24	112	2.00	1.35		
Ethylbenzene*	<0.050	0.050	10/11/2016	ND	2.18	109	2.00	1.08		
Total Xylenes*	<0.150	0.150	10/11/2016	ND	6.58	110	6.00	1.07		
Total BTEX	<0.300	0.300	10/11/2016	ND						

Surrogate: 4-Bromofluorobenzene (PID) 101 % 73.6-140

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	10/08/2016	ND	185	92.3	200	5.29		
DRO >C10-C28	<10.0	10.0	10/08/2016	ND	199	99.4	200	0.107		

Surrogate: 1-Chlorooctane 82.0 % 35-147

Surrogate: 1-Chlorooctadecane 88.2 % 28-171

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:**

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

Received:	10/06/2016	Sampling Date:	10/03/2016
Reported:	10/13/2016	Sampling Type:	Soil
Project Name:	KING COBRA 2 STATE #001H	Sampling Condition:	Cool & Intact
Project Number:	COG	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

**Sample ID: SP 1 @ 2' (H602258-03)**

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	10/11/2016	ND	2.19	109	2.00	0.609	
Toluene*	<0.050	0.050	10/11/2016	ND	2.24	112	2.00	1.35	
Ethylbenzene*	<0.050	0.050	10/11/2016	ND	2.18	109	2.00	1.08	
Total Xylenes*	<0.150	0.150	10/11/2016	ND	6.58	110	6.00	1.07	
Total BTEX	<0.300	0.300	10/11/2016	ND					

Surrogate: 4-Bromofluorobenzene (PID) 98.9 % 73.6-140

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	10/08/2016	ND	185	92.3	200	5.29	
DRO >C10-C28	<10.0	10.0	10/08/2016	ND	199	99.4	200	0.107	

Surrogate: 1-Chlorooctane 81.3 % 35-147

Surrogate: 1-Chlorooctadecane 85.4 % 28-171

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:**

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

Received:	10/06/2016	Sampling Date:	10/03/2016
Reported:	10/13/2016	Sampling Type:	Soil
Project Name:	KING COBRA 2 STATE #001H	Sampling Condition:	Cool & Intact
Project Number:	COG	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

**Sample ID: SP 2 @ SURFACE (H602258-04)**

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	10/11/2016	ND	2.19	109	2.00	0.609	
Toluene*	<0.050	0.050	10/11/2016	ND	2.24	112	2.00	1.35	
Ethylbenzene*	<0.050	0.050	10/11/2016	ND	2.18	109	2.00	1.08	
Total Xylenes*	<0.150	0.150	10/11/2016	ND	6.58	110	6.00	1.07	
Total BTX	<0.300	0.300	10/11/2016	ND					

Surrogate: 4-Bromofluorobenzene (PID) 97.7 % 73.6-140

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	10/08/2016	ND	185	92.3	200	5.29	
DRO >C10-C28	243	10.0	10/08/2016	ND	199	99.4	200	0.107	

Surrogate: 1-Chlorooctane 76.1 % 35-147

Surrogate: 1-Chlorooctadecane 89.6 % 28-171

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:**

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

Received:	10/06/2016	Sampling Date:	10/03/2016
Reported:	10/13/2016	Sampling Type:	Soil
Project Name:	KING COBRA 2 STATE #001H	Sampling Condition:	Cool & Intact
Project Number:	COG	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

**Sample ID: SP 2 @ 1' (H602258-05)**

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	10/11/2016	ND	2.19	109	2.00	0.609	
Toluene*	<0.050	0.050	10/11/2016	ND	2.24	112	2.00	1.35	
Ethylbenzene*	<0.050	0.050	10/11/2016	ND	2.18	109	2.00	1.08	
Total Xylenes*	<0.150	0.150	10/11/2016	ND	6.58	110	6.00	1.07	
Total BTEX	<0.300	0.300	10/11/2016	ND					

Surrogate: 4-Bromofluorobenzene (PID) 96.8 % 73.6-140

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	10/08/2016	ND	185	92.3	200	5.29	
DRO >C10-C28	256	10.0	10/08/2016	ND	199	99.4	200	0.107	

Surrogate: 1-Chlorooctane 82.4 % 35-147

Surrogate: 1-Chlorooctadecane 101 % 28-171

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:**

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

Received:	10/06/2016	Sampling Date:	10/03/2016
Reported:	10/13/2016	Sampling Type:	Soil
Project Name:	KING COBRA 2 STATE #001H	Sampling Condition:	Cool & Intact
Project Number:	COG	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

**Sample ID: SP 2 @ 2' (H602258-06)**

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	10/11/2016	ND	2.18	109	2.00	1.38		
Toluene*	<0.050	0.050	10/11/2016	ND	2.27	114	2.00	1.12		
Ethylbenzene*	<0.050	0.050	10/11/2016	ND	2.21	110	2.00	1.03		
Total Xylenes*	<0.150	0.150	10/11/2016	ND	6.66	111	6.00	0.694		
Total BTEX	<0.300	0.300	10/11/2016	ND						

Surrogate: 4-Bromofluorobenzene (PID) 98.2 % 73.6-140

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	10/08/2016	ND	185	92.3	200	5.29	
DRO >C10-C28	<10.0	10.0	10/08/2016	ND	199	99.4	200	0.107	

Surrogate: 1-Chlorooctane 92.9 % 35-147

Surrogate: 1-Chlorooctadecane 99.3 % 28-171

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

### Notes and Definitions

S-06	The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.
QR-03	The RPD value for the sample duplicate or MS/MSD was outside if 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

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

**CARDINAL LABORATORIES**

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

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

Company Name: BBC International, Inc.		P.O. #:													
Project Manager: Cliff Brunson		Company: COG													
Address: P.O. Box 805		Attn: Robert Smith													
City: Hobbs		Address: Robert Smith													
State: NM Zip: 88241															
Phone #: 575-397-6388		City: Robert Smith													
Fax #: 575-397-0397		State: Zip:													
Project #:		Project Owner: COG													
Project Name: King Cobra 2 State #001H		City: Zip:													
Project Location: Lea County, NM		State: Zip:													
Sample Name: Price Brunson		Phone #:													
FOR LAB USE ONLY		Fax #:													
Lab I.D.		Sample I.D.													
H002258															
SP1 @ SURFACE		(G)RAB OR (C)OMP.													
1		# CONTAINERS													
2		GROUNDWATER													
3		WASTEWATER													
4		SOIL													
5		OIL													
6		SLUDGE													
7		OTHER :													
8		ACID/BASE:													
9		ICE / COOL													
10		OTHER :													
11		DATE													
12		TIME													
13		TPH													
14		BTEX													
15															
16															
17															
18															
19															
20															
21															
22															
23															
24															
25															
26															
27															
28															
29															
30															
31															
32															
33															
34															
35															
36															
37															
38															
39															
40															
41															
42															
43															
44															
45															
46															
47															
48															
49															
50															
51															
52															
53															
54															
55															
56															
57															
58															
59															
60															
61															
62															
63															
64															
65															
66															
67															
68															
69															
70															
71															
72															
73															
74															
75															
76															
77															
78															
79															
80															
81															
82															
83															
84															
85															
86															
87															
88															
89															
90															
91															
92															
93															
94															
95															
96															
97															
98															
99															
100															

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

Relinquished By:

Date: 10/3/16

Received By:

Phone Result:

Yes ☐ No ☐

Remarks:

Yes ☐ No ☐

Add'l Phone #:

Add'l Fax #:

Relinquished By:

Date: 10/3/16

Received By:

Phone Result:

Yes ☐ No ☐

Remarks:

Yes ☐ No ☐

Add'l Phone #:

Add'l Fax #:

Delivered By: (Circle One)

Date: 10/3/16

Received By:

Phone Result:

Yes ☐ No ☐

Remarks:

Yes ☐ No ☐

Add'l Phone #:

Add'l Fax #:

Sample - UPS - Bus - Other:

Date: 10/3/16

Received By:

Phone Result:

Yes ☐ No ☐

Remarks:

Yes ☐ No ☐

Add'l Phone #:

Add'l Fax #:

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

#75



**From:** Lynch, Kristen, EMNRD  
**To:** [Cliff Brunson](#)  
**Cc:** [Robert Grubbs](#); [Ken Swinney](#); [Jennifer Gilkey](#); [Kathy Purvis](#)  
**Subject:** RE: COG - King Cobra 2 State #001H - Remediation Plan  
**Date:** Thursday, November 10, 2016 8:08:51 AM  
**Attachments:** [1RP 4196 & 4386 COG Remediation Packet King Cobra 2 State #001H.pdf](#)

---

Good Morning,

Cliff, after review NMOCD approves this work plan for the above mentioned site. Please specify if this work plan covers both RPs. I would assume it would cover both due to the nature of both releases being in the same area.

Thank You,

*Kristen D. Lynch  
Environmental Specialist, District 1  
Oil Conservation Division, EMNRD  
(575) 393-6161 ext. 111  
575-370-3180 (emergency-cell)*

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:** Cliff Brunson [mailto:[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)]  
**Sent:** Friday, November 04, 2016 3:28 PM  
**To:** Lynch, Kristen, EMNRD  
**Cc:** Robert Grubbs; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** COG - King Cobra 2 State #001H - Remediation Plan

Kristen,

This e-mail is to confirm our discussion concerning the remediation plan for the COG King Cobra 2 State #001H release. I have attached the information packet that we used in our discussion with a cover page describing the remediation plan that we agreed upon.

If you would please reply back via e-mail with your concurrence on this plan, it would be greatly appreciated.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS  
President  
BBC International, Inc.  
World-Wide Environmental Specialists  
Mailing Address:

P. O. Box 805  
Hobbs, NM 88241-0805 USA  
Shipping Address:  
1324 W. Marland St.  
Hobbs, NM 88240 USA  
Phone: (575) 397-6388  
Fax: (575) 397-0397  
E-Mail: [cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)



\*\*\*\*\*

Confidentiality Notice: This electronic transmission (and any attached documents) is intended only for the person(s) to whom it is addressed and may contain information that is privileged, confidential, or otherwise protected from disclosure. If you have received this transmission in error, please immediately notify the sender by e-mail or by telephone call to (575) 397-6388 for handling instructions. Any disclosure or distribution of the contents of this transmission by anyone other than the named recipient(s) is strictly prohibited.

\*\*\*\*\*

**From:** Cliff Brunson  
**To:** ["Lynch, Kristen, EMNRD"](#)  
**Cc:** ["Robert Grubbs"](#); ["Ken Swinney"](#); ["Jennifer Gilkey"](#); ["Kathy Purvis"](#)  
**Subject:** RE: COG - King Cobra 2 State #001H - Remediation Plan  
**Date:** Monday, November 14, 2016 3:40:52 PM

---

Kristen,

This is to confirm that this plan will cover both leaks.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS  
President  
BBC International, Inc.  
World-Wide Environmental Specialists  
Mailing Address:  
P. O. Box 805  
Hobbs, NM 88241-0805 USA  
Shipping Address:  
1324 W. Marland St.  
Hobbs, NM 88240 USA  
Phone: (575) 397-6388  
Fax: (575) 397-0397  
E-Mail: [cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)



\*\*\*\*\*

Confidentiality Notice: This electronic transmission (and any attached documents) is intended only for the person(s) to whom it is addressed and may contain information that is privileged, confidential, or otherwise protected from disclosure. If you have received this transmission in error, please immediately notify the sender by e-mail or by telephone call to (575) 397-6388 for handling instructions. Any disclosure or distribution of the contents of this transmission by anyone other than the named recipient(s) is strictly prohibited.

\*\*\*\*\*

---

**From:** Lynch, Kristen, EMNRD [mailto:[Kristen.Lynch@state.nm.us](mailto:Kristen.Lynch@state.nm.us)]  
**Sent:** Thursday, November 10, 2016 7:48 AM  
**To:** Cliff Brunson <[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)>  
**Cc:** Robert Grubbs <[RGrubbs@concho.com](mailto:RGrubbs@concho.com)>; Ken Swinney <[kswinney@bbcinternational.com](mailto:kswinney@bbcinternational.com)>; Jennifer Gilkey <[jgilkey@bbcinternational.com](mailto:jgilkey@bbcinternational.com)>; Kathy Purvis <[kathy@bbcinternational.com](mailto:kathy@bbcinternational.com)>  
**Subject:** RE: COG - King Cobra 2 State #001H - Remediation Plan

Good Morning,

Cliff, after review NMOCD approves this work plan for the above mentioned site. Please specify if this work plan covers both RPs. I would assume it would cover both due to the nature of both releases being in the same area.

Thank You,

*Kristen D. Lynch  
Environmental Specialist, District 1  
Oil Conservation Division, EMNRD  
(575) 393-6161 ext. 111  
575-370-3180 (emergency-cell)*

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:** Cliff Brunson [<mailto:cbrunson@bbcinternational.com>]  
**Sent:** Friday, November 04, 2016 3:28 PM  
**To:** Lynch, Kristen, EMNRD  
**Cc:** Robert Grubbs; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** COG - King Cobra 2 State #001H - Remediation Plan

Kristen,

This e-mail is to confirm our discussion concerning the remediation plan for the COG King Cobra 2 State #001H release. I have attached the information packet that we used in our discussion with a cover page describing the remediation plan that we agreed upon.

If you would please reply back via e-mail with your concurrence on this plan, it would be greatly appreciated.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS  
President  
BBC International, Inc.  
World-Wide Environmental Specialists  
Mailing Address:  
P. O. Box 805  
Hobbs, NM 88241-0805 USA  
Shipping Address:  
1324 W. Marland St.  
Hobbs, NM 88240 USA  
Phone: (575) 397-6388  
Fax: (575) 397-0397  
E-Mail: [cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)



\*\*\*\*\*  
Confidentiality Notice: This electronic transmission (and any attached documents) is intended only for the person(s) to whom it is addressed and may contain information that is privileged, confidential, or otherwise protected from disclosure. If you have received this transmission in error, please immediately notify the sender by e-mail or by telephone call to (575) 397-6388 for handling instructions. Any disclosure or distribution of the contents of this transmission by anyone other than the named recipient(s) is strictly prohibited.  
\*\*\*\*\*

















**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 162890

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 162890
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

Created By	Condition	Condition Date
amaxwell	None	12/1/2022