



December 15, 2022

District Supervisor  
Oil Conservation Division, District 2  
506 W. Texas  
Artesia, New Mexico 88210

**Re: Closure Report  
ConocoPhillips  
Heritage Concho  
Big Papi Federal Com #2 Release  
Unit Letter G, Section 4, Township 26 South, Range 29 East  
Eddy County, New Mexico  
Incident ID# nAB1524338360  
2RP-3228**

Sir or Madam:

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips (COP) to assess and evaluate a Heritage Concho (COG) release, interim remedial action, and subsequent monitoring actions taken at the Big Papi Federal Com #2 release site (API No. 30-015-37833). The release footprint is located in Public Land Survey System (PLSS) Unit Letter G, Section 4, Township 26 South, Range 29 East, in Eddy County, New Mexico (Site). The approximate release point occurred at coordinates 32.074793°, -103.985154°, as shown on Figures 1 and 2.

## BACKGROUND

According to the State of New Mexico Oil Conservation Division (NMOCD) C-141 Initial Report, the release was discovered on August 7, 2015. A split in a poly flow line running parallel to the road led to the release of approximately 125 barrels (bbls) of produced water, of which approximately 120 bbls were recovered. The release impacted the surrounding pasture, lease road, and crossed pipeline right of ways running parallel to the lease road. The release path ranged from approximately 30 feet in width at the initial point of release to 2 feet in width on the east side of the lease road and pipeline right of ways. The initial point of release occurred on a hillside, causing the fluid to flow quickly in some areas while pooling in low lying areas. The release location and approximate release extent are shown in Figure 3.

The NMOCD approved the initial C-141 on August 31, 2015, and subsequently assigned the release the Incident ID nAB1524338360 and the remediation permit (RP) number 2RP-3228. The initial C-141 form is included in Appendix A.

The Big Papi Federal Com #2 release (2RP-3228/ nAB1524338360) is included in an Agreed Compliance Order ("ACO") with the NMOCD, related to unresolved releases from COPC's predecessor-in-interest ("COG"). The ACO required COPC to submit characterization and/or remediation plans with proposed timeframes for the ongoing corrective actions or remediations identified to the NMOCD no later than March 31, 2022. As of March 11, 2022, COPC has submitted characterization and remediation plans for all of the properties identified and owned. All documentation was submitted in accordance with ACO terms. These documents have been submitted to the NMOCD via CentreStack, a Secure Access & File Sharing platform, at the direction of Mr. Bradford Billings, NMOCD.

Tetra Tech

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

Tel 432.682.4559 Fax 432.682.3946 www.tetrattech.com

## SITE ASSESSMENT AND JANUARY 2016 WORK PLAN

Following the release, COG dispatched vacuum trucks to recover standing fluid. In October 2015, soil samples were collected from eight (8) locations (S1 through S8) chosen based on safe proximity to existing gas lines and release pooling areas. The assessment sampling locations are presented in Figure 4. A total of forty-eight (48) samples were collected from the eight locations and sent to Cardinal Laboratories in Hobbs, New Mexico to be analyzed for chlorides via method SM4500Cl-B. Analytical results associated with samples collected during the October 2015 assessment activities are summarized in Table 1.

A Work Plan dated January 11, 2016 was prepared by COG based on the results of the October 2015 site assessment and submitted to NMOCD and the Bureau of Land Management (BLM) via email. The Work Plan proposed a surface scrape to approximately 4 inches below ground surface (bgs) at sample locations S1, S2, and S4; excavation to a depth of 1.5 feet bgs at sample location S3; and surface tillage with no excavation at sample locations S5 through S8. Areas such as the lease road and the pipeline right of way were not proposed for excavation due to safety concerns associated with work performed in those areas. The impacted area of the lease road was proposed to be bladed and caliche added to reduce the low-lying areas in the road, with the intent to immobilize chlorides from future leaching.

The Work Plan was approved by NMOCD via email on January 12, 2016, with the following conditions:

*"Your proposal for partial remediation of the above referenced site is approved, however, due to the elevated chloride levels proposed to be left in place, and, the site being situated in a major drainage feature that terminates in the Pecos River, the site will be deferred, and remain open in OCD database. Like approval from BLM is required."*

The BLM provided their concurrence via email dated February 3, 2016. Copies of the regulatory correspondence are included in Appendix B.

## SITE CHARACTERIZATION

The Work Plan was submitted under the old rule. The Site Characterization performed by COG at the time of the assessment and proposed work plan established a site ranking of zero, based on a depth to groundwater of 125 feet bgs utilizing the Chevron-Texaco Trend Maps. This Site Characterization was accepted when the work plan was approved in January 2016. No other characterization of the Site was performed to establish Site RRAL's in the approved work plan.

## REGULATORY FRAMEWORK

Based upon the accepted site characterization data, the recommended remedial action levels (RRALs) for chlorides in soil were assumed to be established as follows.

Constituent	Established Site RRALs
Chloride	10,000 mg/kg

## PARTIAL REMEDIAL ACTION AND MARCH 2016 CLOSURE REQUEST

On March 7, 2016, the partial remedial action as detailed in COG's work plan, approved by the NMOCD and BLM, was completed at the Site. The areas surrounding S1, S2, and S4 were scraped approximately 4 inches, to remove any visible staining. The area surrounding S3 was excavated to 1.5 feet below ground surface and backfilled with topsoil. Surface tillage was performed on the areas surrounding S5 through S8 where a sandy topsoil overlying a caliche base was located, and no excavation. Areas including the lease road and pipeline right of way were not excavated due to safety concerns, as detailed in the approved Work Plan. The lease road was bladed and caliche added to reduce the low lying areas in the road, in order to immobilize the chlorides from leaching. COG presented no figure indicating the areas remediated during the partial remediation. The inferred areas of remediation are presented in Figure 5.

A Closure Request dated March 21, 2016 was prepared by COG stating that all remedial work had been performed per the approved Work Plan and was submitted via email to NMOCD and the BLM.

The NMOCD rejected the Closure Request in an email March 28, 2016 with the following comments:

*Your work plan approval was only for a partial remediation, with the rest of the work to be deferred. The OCD requests an additional plan on how and when COG proposes to complete the remediation.*

The BLM also requested an additional plan to address the remaining impact in an email dated April 25, 2016. Copies of the regulatory correspondence are included in Appendix B.

## JULY 2016 MONITORING PLAN

In response to the rejection and additional request by NMOCD and BLM, COG submitted a Monitoring Plan dated July 11, 2016 to address impacts left in place following the completion of the approved remediation activities. In this plan, COG proposed long-term monitoring to ensure that the chlorides left in place stabilize at their current depth. This plan was submitted to NMOCD as a portion of the ACO.

Four (4) sampling points were selected: one (1) point in the flow path to measure the leaching, and three (3) points to measure horizontal movement of chlorides. The identified concern was not contamination of groundwater, based on the identified depth to groundwater of 125 feet bgs, but rather horizontal movement of chlorides to the nearby draw, which could potentially impact the downstream Pecos River. The proposed monitoring sampling points are presented in Figure 6.

The proposed monitoring schedule was to collect samples in May of each year for three (3) years beginning in 2017 at the following locations and depths:

- S7 at 12 feet bgs
- S8 at 4 feet bgs
- MP1 at 12 feet bgs
- MP2 at 12 feet bgs

Sampling was proposed to be conducted with a split spoon auger. If the analysis were to show no change, COG would request closure of the open release incident. The BLM approved of the proposed Monitoring Plan in an email dated July 13, 2016, and the NMOCD provided their approval of the proposed monitoring in an email dated July 22, 2016.

## SITE MONITORING ACTIVITIES

Based on the Monitoring Plan approval, American Safety Services, Inc. (ASSI) was contracted by COG to perform soil sampling at the proposed monitoring locations. ASSI personnel utilized an air rotary drilling rig to collect samples from the locations at the predetermined depths on July 27, 2017.

Based upon the footprint of the remainder of the release, the action levels for chlorides in soil were established as equivalent to the reclamation requirement.

Constituent	Reclamation Requirement
Chloride	600 mg/kg

According to the Monitoring Plan report prepared for COG by ASSI (December 2017), a total of four (4) samples were collected from the individual locations and submitted to Xenco Laboratories in Midland, Texas to be analyzed for chloride using EPA Method 300.1.

Analytical results from the 2017 monitoring event imply that there was no horizontal movement of chlorides within the local drainage, adjacent to the lease road, related to Incident ID nAB1524338360. The analytical

Closure Report  
December 15, 2022

ConocoPhillips

results at all four (4) monitoring locations were below the 600 mg/kg RRAL for chloride, as summarized in Table 2. No further monitoring events were conducted at the Site based on the results of the 2017 event.

A report documenting the monitoring activities and the analytical results was provided to COG by ASSI in December 2017. A copy of the ASSI Monitoring Plan report is included as Appendix C.

## CONCLUSION

Based on the previous remedial action and results of the documented monitoring activities performed in July 2017, ConocoPhillips respectfully requests closure for the release incident. Remedial actions were performed at the Site as per the approved 2016 Work Plan. Areas with visible staining were scraped to remove the impacted soil, with the area surrounding S3 was excavated to 1.5 ft bgs to remove impacted soils. The southern extent of the release, with minimal shallow impact, was tilled with no excavation. The lease road was bladed, and caliche added to reduce surface deformities to minimize future leaching.

Although the NMOCD and BLM rejected the closure of the incident, both entities approved the partial remediation, with the stipulation that a monitoring plan be submitted for the remainder of the Site. In July 2016, the Monitoring Plan was submitted by COG and approved by the NMOCD and BLM. A single monitoring event was executed in 2017, and the associated analytical results indicated no movement of chlorides in the subsurface of the drainage area. Although there were no additional monitoring events executed, the results of first monitoring event indicate that there is insignificant remaining chloride impact from the incident, and the obtained results are below the most stringent reclamation requirements.

All analytical results associated with the approved monitoring activities were below applicable Site RRALs for chloride following the 2017 monitoring activities. Based on the previous remedial action, the current site conditions and the analytical results of the monitoring event, no further action is warranted for this release incident.

The final C-141 forms are enclosed in Appendix A. If you have any questions concerning the soil assessment activities for the Site, please call me at (512) 338-2861.

Sincerely,  
**Tetra Tech, Inc.**



Christian M. Llull, P.G.  
Program Manager

cc:  
Mr. Charles Beauvais, BU – ConocoPhillips



Closure Report  
December 15, 2022

ConocoPhillips

## LIST OF ATTACHMENTS

### Figures:

- Figure 1 – Overview Map
- Figure 2 – Topographic Map
- Figure 3 – Approximate Release Extent
- Figure 4 – Site Assessment Map
- Figure 5 – Inferred Remediation Extents
- Figure 6 – Monitoring Locations Map

### Tables:

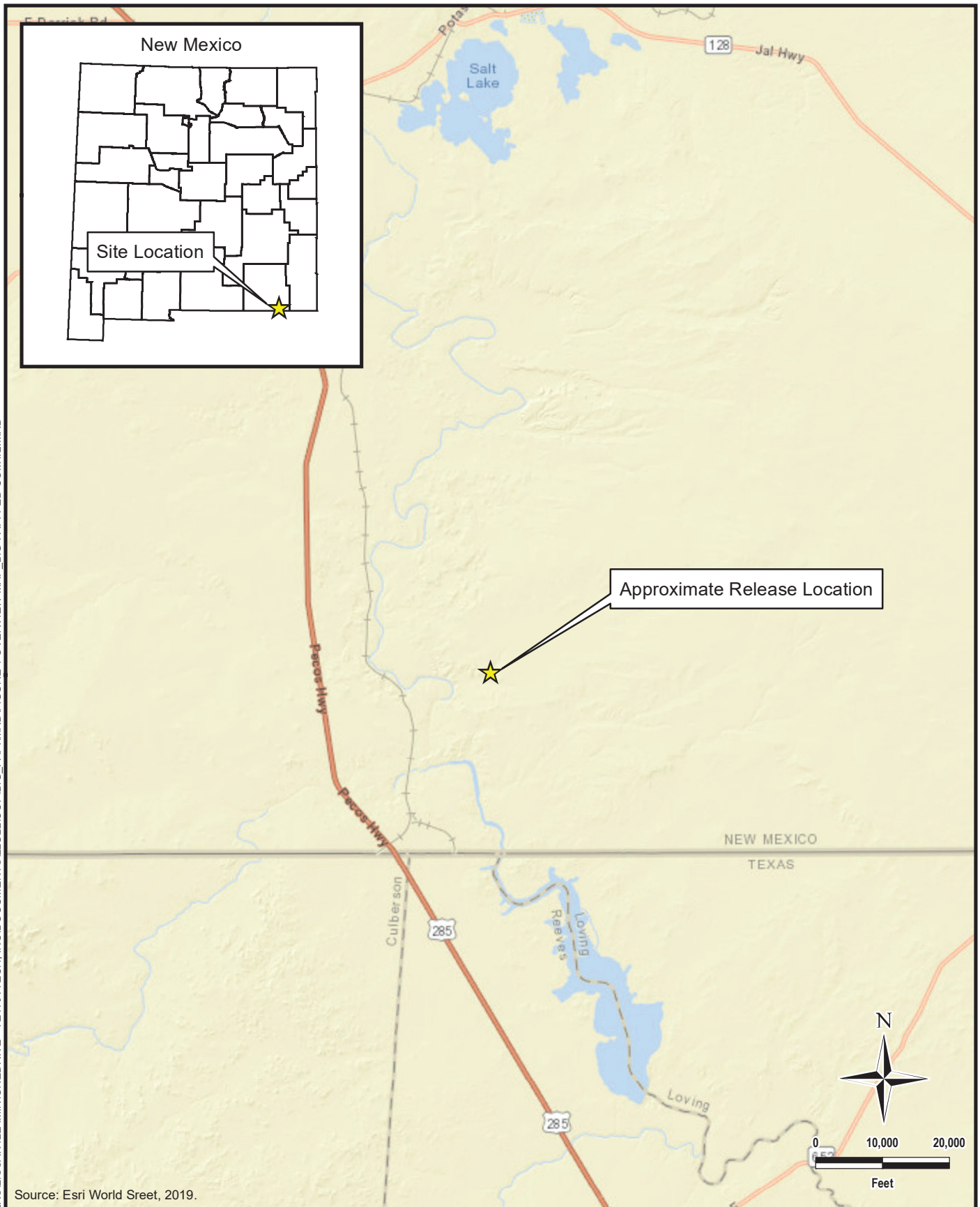
- Table 1 – Summary of Analytical Results – Soil Assessment
- Table 2 – Summary of Analytical Results – Soil Monitoring

### Appendices:

- Appendix A – C-141 Forms
- Appendix B – Regulatory Correspondence
- Appendix C – ASSI Monitoring Report (December 2017)

## **FIGURES**

DOCUMENT PATH: C:\USERS\LISSA.VILLAMONEDRIVE - TETRA TECH\INC\DOCUMENTS\TULLULCOPB\BIG\_PAPI\FED COM #2.MXD



**TETRA TECH**

www.tetrattech.com

901 West Wall Street, Suite 100  
Midland, Texas 79701  
Phone: (432) 682-4559  
Fax: (432) 682-3946

CONOCOPHILLIPS / HERITAGE CONCHO

NAB1524338360 / 2RP-3228  
(32.072767°, -103.986052°)  
EDDY COUNTY, NEW MEXICO

**BIG PAPI FEDERAL COM #2  
OVERVIEW MAP**

PROJECT NO.: 212C-MD-02903

DATE: NOVEMBER 18, 2022

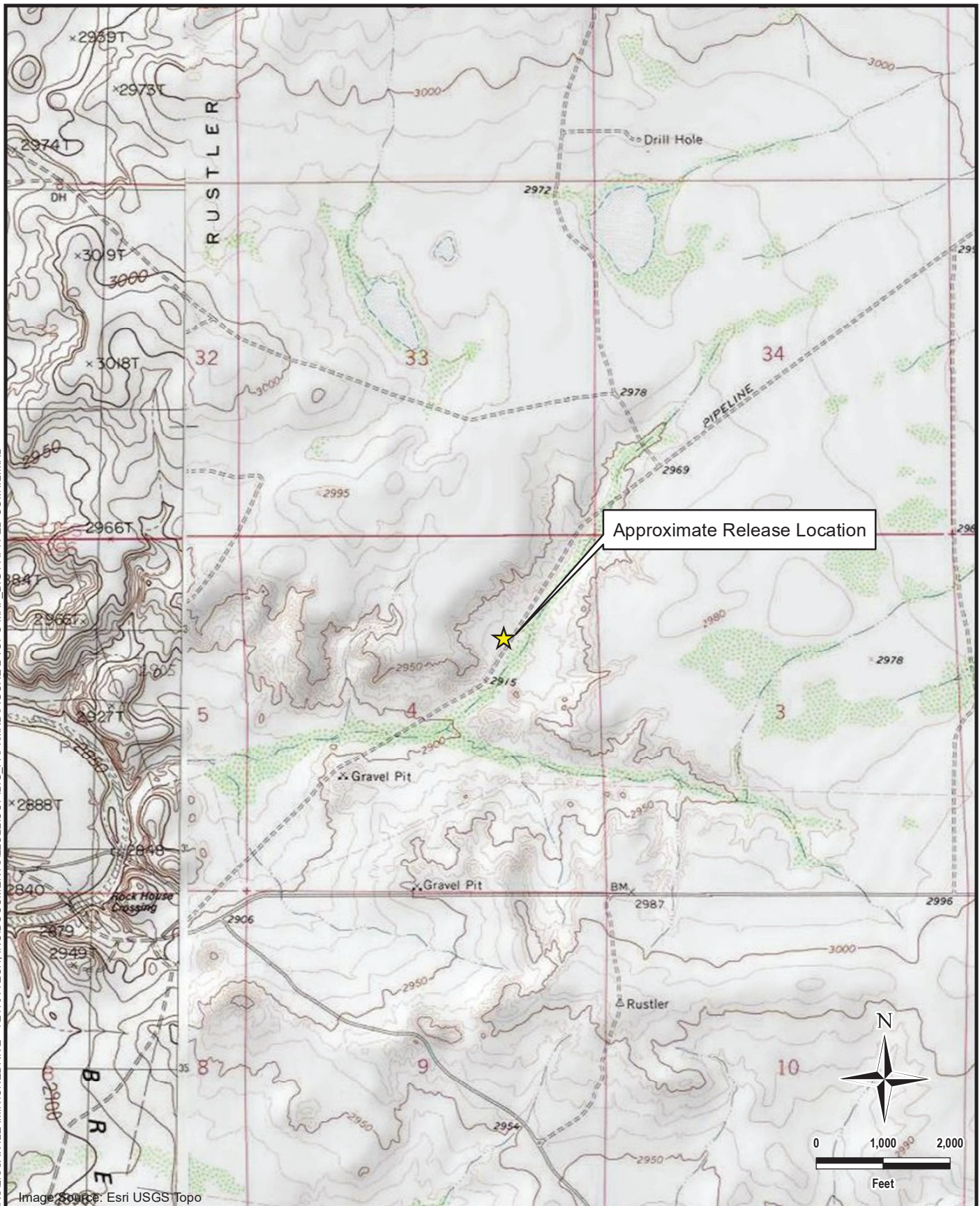
DESIGNED BY: LMV

Figure No.

**1**



DOCUMENT PATH: C:\USERS\LISSA.VILLAMONEDRIVE - TETRA TECH\INC\DOCUMENTS\ULLULLCOPBIG.PAPIMXD\FIGURE 2 TOPO MAP.BIG PAPI FED COM #2.MXD

**TETRA TECH**

www.tetrattech.com

901 West Wall Street, Suite 100  
Midland, Texas 79701  
Phone: (432) 682-4559  
Fax: (432) 682-3946

CONOCOPHILLIPS / HERITAGE CONCHO

NAB1524338360 / 2RP-3228  
(32.072767°, -103.986052°)  
EDDY COUNTY, NEW MEXICO

**BIG PAPI FEDERAL COM #2  
TOPOGRAPHIC MAP**

PROJECT NO.: 212C-MD-02903

DATE: NOVEMBER 18, 2022

DESIGNED BY: LMV


Figure No.

**2**



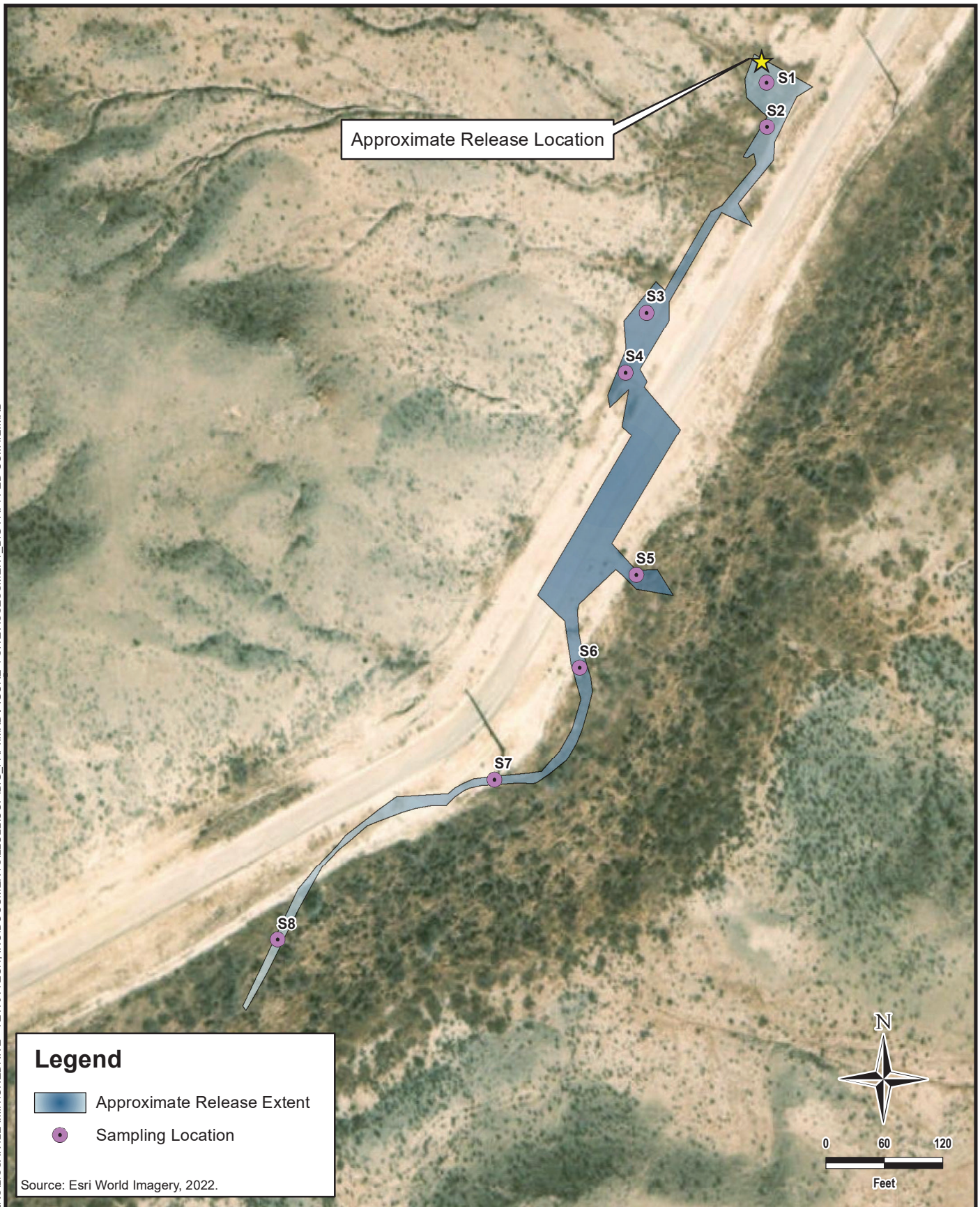
DOCUMENT PATH: C:\USERS\LISSA.VILLAMINON\EDRIVE - TETRA TECH\INCDOCUMENTS\LISSA.VILLAMINON\BIG\_PAPI\FED COM #2.MXD



<div><b>TETRA TECH</b> <a href="http://www.tetratech.com">www.tetratech.com</a> 901 West Wall Street, Suite 100 Midland, Texas 79701 Phone: (432) 682-4559 Fax: (432) 682-3946</div>	<b>CONOCOPHILLIPS / HERITAGE CONCHO</b>		PROJECT NO.: 212C-MD-02903
	NAB1524338360 / 2RP-3228 (32.072767°, -103.986052°) EDDY COUNTY, NEW MEXICO		DATE: NOVEMBER 18, 2022
	<b>BIG PAPI FEDERAL COM #2 APPROXIMATE RELEASE EXTENT</b>		DESIGNED BY: LMV
			Figure No. <b>3</b>



DOCUMENT PATH: C:\USERS\LISSA.VILLAMINIONEDRIVE - TETRA TECH\INCDOCUMENTS\LISSA.VILLAMINIONEDRIVE\BIG PAPI\FED COM #2.MXD



**TETRA TECH**

[www.tetrattech.com](http://www.tetrattech.com)

901 West Wall Street, Suite 100  
Midland, Texas 79701  
Phone: (432) 682-4559  
Fax: (432) 682-3946

CONOCOPHILLIPS / HERITAGE CONCHO

NAB1524338360 / 2RP-3228  
(32.072767°, -103.986052°)  
EDDY COUNTY, NEW MEXICO

**BIG PAPI FEDERAL COM #2  
SITE ASSESSMENT MAP**

PROJECT NO.: 212C-MD-02903

DATE: NOVEMBER 18, 2022

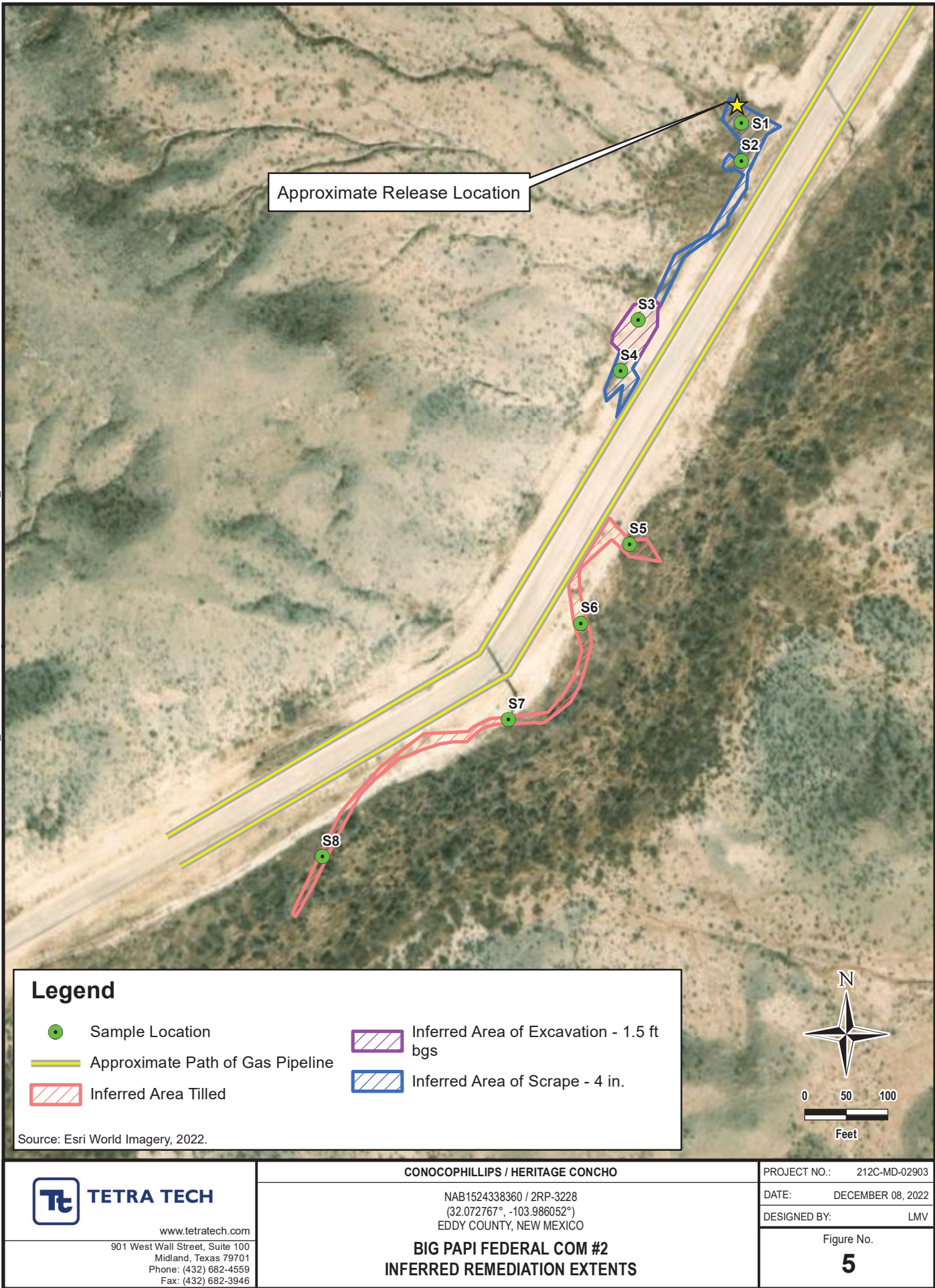
DESIGNED BY: LMV

Figure No.

**4**



DOCUMENT PATH: C:\USERS\LISSA.VILLAMONEDRIVE - TETRA TECH, INC\DOCUMENTS\TULLUL\COPI\BIG\_PAPI\MXD\FIGURE 5 INFERRED REMEDIATION - BIG PAPI FED COM #2.MXD





DOCUMENT PATH: C:\USERS\LISSA.VILLAMINIONEDRIVE - TETRA TECH, INC\DOCUMENTS\TULLULCOP\BIG\_PAPI\MXD\FIGURE 6 MONITORING LOCATIONS\_BIG PAPI FED COM #2.MXD



## **TABLES**

TABLE 1  
SUMMARY OF ANALYTICAL RESULTS  
SOIL ASSESSMENT - nAB1524338360  
CONOCOPHILLIPS  
BIG PAPI FEDERAL COM #2 RELEASE  
EDDY COUNTY, NEW MEXICO

Sample ID	Sample Date	Sample Depth Interval	Chloride <sup>1</sup>	
		ft. bgs	mg/kg	Q
S1	10/15/2015	1	< 16.0	
		2	<b>2520</b>	
		3	<b>12000</b>	
		4	<b>8130</b>	
		6	<b>7360</b>	
		8	432	
S2	10/15/2015	1	< 16.0	
		2	32	
		3	<b>12400</b>	
		4	<b>7600</b>	
		6	432	
S3	10/15/2015	1	<b>9200</b>	
		2	560	
		3	<b>1150</b>	
		4	<b>1150</b>	
		6	<b>816</b>	
S4	10/15/2015	1	< 16.0	
		2	< 16.0	
		3	<b>1570</b>	
		4	<b>25600</b>	
		6	<b>12800</b>	
		8	<b>10100</b>	
		10	<b>8130</b>	
		12	544	
S5	10/15/2015	1	80	
		2	80	
		3	208	
		4	<b>1840</b>	
		6	<b>3400</b>	
		8	96	
S6	10/15/2015	1	64	
		2	256	
		3	<b>2080</b>	
		4	<b>7360</b>	
		6	<b>4200</b>	
		8	48	
S7	10/15/2015	1	96	
		2	96	
		3	96	
		4	560	
		6	<b>16000</b>	
		8	<b>17600</b>	
		10	<b>1540</b>	
		12	< 16.0	
S8	10/15/2015	1	48	
		2	48	
		3	48	
		4	< 16.0	

**NOTES:**

ft. Feet

bgs Below ground surface

mg/kg Milligrams per kilogram

1 EPA Method SM4500Cl-B

**Bold and italicized values indicate exceedance of proposed RRALs.**

TABLE 2  
SUMMARY OF ANALYTICAL RESULTS  
SOIL MONITORING - nAB1524338360  
CONOCOPHILLIPS  
BIG PAPI FEDERAL COM #2 RELEASE  
EDDY COUNTY, NEW MEXICO

Sample ID	Sample Date	Sample Depth Interval	Chloride <sup>1</sup>	
		ft. bgs	mg/kg	Q
S7	7/27/2017	11-12	< 4.99	
MP1	7/27/2017	11-12	13	
S8	7/27/2017	3-4	< 5.00	
MP2	7/27/2017	11-12	< 4.98	

NOTES:

ft. Feet

bgs Below ground surface

mg/kg Milligrams per kilogram

1 EPA Method 300.1

***Bold and italicized values indicate exceedance of proposed RRALs.***

## **APPENDIX A C-141 Forms**



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

**NAB1524338360**

#### OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: COG Operating LLC <b>229137</b>	Contact: Robert McNeill
Address: 600 West Illinois Avenue, Midland TX 79701	Telephone No. 432-230-0077
Facility Name: Big Papi Federal Com #2H	Facility Type: Well
Surface Owner: Federal	Mineral Owner:
API No. 30-015-37833	

#### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
C	4	26S	29E	330'	North	1980'	West	Eddy

Latitude 32.0780182 Longitude -103.9915085

#### NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: 125 bbls PW	Volume Recovered: 120 bbls PW
Source of Release: Flowline	Date and Hour of Occurrence: 8/7/2015 7:00 am	Date and Hour of Discovery: 8/7/2015 7:00 am
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Mike Bratcher - NMOCD / Jim Amos - BLM	
By Whom? Lupe Carrasco	Date and Hour: Saturday, August 08, 2015 2:18 PM	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

**NM OIL CONSERVATION**  
ARTESIA DISTRICT

**AUG 28 2015**

**RECEIVED**

If a Watercourse was Impacted, Describe Fully.\*


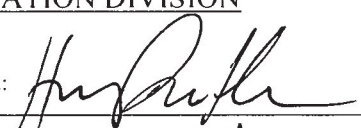
Describe Cause of Problem and Remedial Action Taken.\*

This release was caused a poly flowline. Vacuum trucks were dispatched to recover all standing fluids and repairs were made to the line.

Describe Area Affected and Cleanup Action Taken.\*

This release occurred along the road in an area about 20' x 100'. 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: Amanda Trujillo	Approved by Environmental Specialist: 	
Title: Senior Environmental Coordinator	Approval Date: <b>8/31/15</b>	Expiration Date: <b>N/A</b>
E-mail Address: <a href="mailto:atrujillo@concho.com">atrujillo@concho.com</a>	Conditions of Approval:	
Date: 8/21/2015 Phone: 575-748-6940	<b>Remediation per O.C.D. Rules &amp; Guidelines</b> <b>SUBMIT REMEDIATION PROPOSAL NO</b> <b>LATER THAN: <u>10/21/15</u></b>	

Attached ☐

\* Attach Additional Sheets If Necessary

**2RP-3228**

Incident ID	nAB1524338360
District RP	2RP-3228
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: Charles Beauvais

Title: Senior Environmental Engineer

Signature: Charles R. Beauvais II

Date: 12/14/2022

email: charles.r.beauvais@conocophillips.com

Telephone: 575-988-2043

**OCD Only**

Received by: Jocelyn Harimon

Date: 12/15/2022

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: Brittany Hall

Date: 1/4/2023

Printed Name: Brittany Hall

Title: Environmental Specialist

## **APPENDIX B**

### **Regulatory Correspondence**

## Bratcher, Mike, EMNRD

---

**From:** Bratcher, Mike, EMNRD  
**Sent:** Tuesday, January 12, 2016 7:52 AM  
**To:** 'Lupe Carrasco'; Patterson, Heather, EMNRD; 'stucker@blm.gov'; Amos, James (jamos@blm.gov)  
**Cc:** Amanda Trujillo Davis  
**Subject:** RE: (Work Plan) Big Papi Federal Com #2 (30-015-37833)

RE: COG \* Big Papi Fed Com 2H \* 30-015-37833  
2RP-3228 \* Date of release: 8/7/2015

Lupe,

Your proposal for partial remediation of the above referenced site is approved, however, due to the elevated chloride levels proposed to be left in place, and, the site being situated in a major drainage feature that terminates in the Pecos River, the site will be deferred, and remain open in OCD database. Like approval from BLM is required.

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.

If you have any questions or concerns, and for notification, please contact me.

Mike Bratcher  
NMOCD District 2  
811 S. First Street  
Artesia, NM 88210  
O: 575-748-1283 X108  
C: 575-626-0857  
F: 575-748-9720

---

**From:** Lupe Carrasco [mailto:GCarrasco@concho.com]  
**Sent:** Monday, January 11, 2016 10:04 AM  
**To:** Patterson, Heather, EMNRD; Bratcher, Mike, EMNRD; 'stucker@blm.gov'; Amos, James (jamos@blm.gov)  
**Cc:** Amanda Trujillo Davis  
**Subject:** (Work Plan) Big Papi Federal Com #2 (30-015-37833)

Mr. Bratcher/Mrs. Patterson,

Attached for your consideration is a copy of a work plan for the Big Papi Federal Com #1. Please feel free to contact me with any questions or concerns.

Thanks!

**Lupe Carrasco**

Environmental Coordinator  
Concho Resources  
Cell: 575-725-0787  
Office: 575-748-6933  
[gcarrasco@concho.com](mailto:gcarrasco@concho.com)

1401 Commerce Drive  
Carlsbad, NM 88220



CONFIDENTIALITY NOTICE: The information in this email may be confidential and/or privileged. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this email and its attachments, if any, or the information herein, is prohibited. If you received this email in error, please immediately notify the sender by return email and delete this email from your system. Thank you.

---

**From:** Amanda Trujillo  
**Sent:** Tuesday, September 22, 2015 4:19 PM  
**To:** Tucker, Shelly  
**Cc:** Heather Patterson; Mike.Bratcher@state.nm.us; James\_Amos@blm.gov  
**Subject:** RE: (C-141 Initial) Big Papi Federal Com #2 (30-015-37833)

Shelly,

The Big Papi had sampling scheduled for tomorrow but was rescheduled due to rain. We will submit a workplan for approval once delineation is complete. Please feel free to contact me if you have any additional questions.

Thank you,

**Amanda Trujillo**  
Senior Environmental Coordinator  
COG Operating LLC  
Cell: 505.350.1336  
Office: 575.748.6930  
[atrujillo@concho.com](mailto:atrujillo@concho.com)

2407 Pecos Ave.  
Artesia , NM 88210



CONFIDENTIALITY NOTICE: The information in this email may be confidential and/or privileged. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this email and its attachments, if any, or the information herein, is prohibited. If you received this email in error, please immediately notify the sender by return email and delete this email from your system. Thank you.

**From:** Tucker, Shelly [<mailto:stucker@blm.gov>]  
**Sent:** Monday, September 14, 2015 9:18 AM  
**To:** Amanda Trujillo

**Cc:** Heather Patterson; [Mike.Bratcher@state.nm.us](mailto:Mike.Bratcher@state.nm.us); [James\\_Amos@blm.gov](mailto:James_Amos@blm.gov)

**Subject:** Re: (C-141 Initial) Big Papi Federal Com #2 (30-015-37833)

Morning! Hope you all had a great weekend. I was checking on the status of this clean-up....  
Have you designed a CAP?

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

Sincerely,

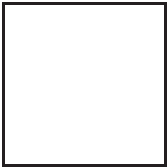
*Shelly J Tucker*

Environmental Protection Specialist  
Bureau of Land Management

620 E. Greene St  
Carlsbad, NM 88220

575.234.5905 - Direct  
575.361.0084 - Cellular

[stucker@blm.gov](mailto:stucker@blm.gov)



On Fri, Aug 28, 2015 at 9:30 PM, Amanda Trujillo <[ATrujillo@concho.com](mailto:ATrujillo@concho.com)> wrote:

Mr. Bratcher,

Attached is a C-141 for your consideration. Please feel free to call me if you have any additional questions.

Thank you,

**Amanda Trujillo**

Senior Environmental Coordinator



COG Operating LLC

Cell: 505.350.1336

Office: 575.748.6930

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

2407 Pecos Ave.

Artesia , NM 88210



CONFIDENTIALITY NOTICE: The information in this email may be confidential and/or privileged. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this email and its attachments, if any, or the information herein, is prohibited. If you received this email in error, please immediately notify the sender by return email and delete this email from your system. Thank you.

---

**From:** Lupe Carrasco  
**Sent:** Saturday, August 08, 2015 2:18 PM  
**To:** NMOCD; Patterson, Heather, EMNRD; James Amos; [stucker@blm.gov](mailto:stucker@blm.gov)  
**Subject:** Fwd: (Notification) Big Papi Federal Com #2 (30-015-37833)

Sent via the Samsung Galaxy S®6 active, an AT&T 4G LTE smartphone

Mr. Bratcher,

COG Operating LLC is reporting a release on the Big Papi Federal Com #2 (30-015-37833).

Unit C Section 04 Township 26S Range 29E

The release occurred at 7:00 am on 8/7/2015.

Released: 125 bbls PW

Recovered: 120 bbls PW

The release was caused by by a poly line failure impacting the lease road and the nearby pasture. The area is being evaluated and a C-141 will be submitted. If you have any additional questions please feel free to contact me.

Thank you,

**Amanda Trujillo**

Senior Environmental Coordinator

COG Operating LLC

Cell: [505.350.1336](tel:505.350.1336)

Office: [575.748.6930](tel:575.748.6930)

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

[2407 Pecos Ave.](#)

[Artesia , NM 88210](#)

CONFIDENTIALITY NOTICE: The information in this email may be confidential and/or privileged. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this email and its attachments, if any, or the information herein, is prohibited. If you received this email in error, please immediately notify the sender by return email and delete this email from your system. Thank you.

CONFIDENTIALITY NOTICE: The information in this email may be confidential and/or privileged. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this email and its attachments, if any, or the information contained herein, is prohibited. If you have received this email in error, please immediately notify the sender by return email and delete this email from your system. Thank you.

**Bratcher, Mike, EMNRD**

---

**From:** Tucker, Shelly <stucker@blm.gov>  
**Sent:** Wednesday, February 03, 2016 2:05 PM  
**To:** Lupe Carrasco  
**Cc:** Bratcher, Mike, EMNRD; Patterson, Heather, EMNRD; Amos, James (jamos@blm.gov); Amanda Trujillo Davis  
**Subject:** Re: [External] Re: (Work Plan) Big Papi Federal Com #2 (30-015-37833)

OK...sounds good. Just wanted to make sure we were all on the same page.

BLM concurs with the NMOCD.

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

Sincerely,

*Shelly J Tucker*

Environmental Protection Specialist  
Bureau of Land Management

620 E. Greene St  
Carlsbad, NM 88220

575.234.5905 - Direct  
575.361.0084 - Cellular

[stucker@blm.gov](mailto:stucker@blm.gov)



The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. In such an event that the location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until the contaminant issues are fully mitigated and the location is successfully reclaimed. In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

**Confidentiality Warning:** This message along with any attachments are intended only for use of the individual or entity to which it is addressed and may contain information that is privileged or confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately.

On Wed, Feb 3, 2016 at 1:59 PM, Lupe Carrasco <[GCarrasco@concho.com](mailto:GCarrasco@concho.com)> wrote:

Shelly,

I apologize for the mistake, but all information is in regards to the Big Papi Federal Com #2 (30-015-37833).

Thanks!

## Lupe Carrasco

Environmental Coordinator

Concho Resources

Cell: 575-725-0787

Office: 575-748-6933

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

1401 Commerce Drive

Carlsbad, NM 88220



CONFIDENTIALITY NOTICE: The information in this email may be confidential and/or privileged. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this email and its attachments, if any, or the information herein, is prohibited. If you received this email in error, please immediately notify the sender by return email and delete this email from your system. Thank you.

**From:** Tucker, Shelly [mailto:[stucker@blm.gov](mailto:stucker@blm.gov)]

**Sent:** Wednesday, February 03, 2016 1:56 PM

**To:** Bratcher, Mike, EMNRD

**Cc:** Lupe Carrasco; Patterson, Heather, EMNRD; Amos, James ([jamos@blm.gov](mailto:jamos@blm.gov)); Amanda Trujillo Davis

**Subject:** [External] Re: (Work Plan) Big Papi Federal Com #2 (30-015-37833)

\*\*\*\* External email. Use caution. \*\*\*\*

Lupe,

Question...your work plan references the Big Papi Federal Com 1 and the analyticals also reference Big Papi Federal Com 1. The API number used references the Big Papi Fed Com 2H. Is this for the Big Papi 1 or 2H?

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

Sincerely,

*Shelly J Tucker*

Environmental Protection Specialist

Bureau of Land Management

620 E. Greene St

Carlsbad, NM 88220

575.234.5905 - Direct

575.361.0084 - Cellular

[stucker@blm.gov](mailto:stucker@blm.gov)





The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. In such an event that the location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until the contaminant issues are fully mitigated and the location is successfully reclaimed. In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

**Confidentiality Warning:** This message along with any attachments are intended only for use of the individual or entity to which it is addressed and may contain information that is privileged or confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately.

On Tue, Jan 12, 2016 at 7:51 AM, Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)> wrote:

RE: COG \* Big Papi Fed Com 2H \* 30-015-37833

2RP-3228 \* Date of release: 8/7/2015

Lupe,

Your proposal for partial remediation of the above referenced site is approved, however, due to the elevated chloride levels proposed to be left in place, and, the site being situated in a major drainage feature that terminates in the Pecos River, the site will be deferred, and remain open in OCD database. Like approval from BLM is required.

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.

If you have any questions or concerns, and for notification, please contact me.

Mike Bratcher

NMOCD District 2

811 S. First Street

Artesia, NM 88210

O: 575-748-1283 X108

C: 575-626-0857

F: 575-748-9720

---

**From:** Lupe Carrasco [mailto:[GCarrasco@concho.com](mailto:GCarrasco@concho.com)]

**Sent:** Monday, January 11, 2016 10:04 AM

**To:** Patterson, Heather, EMNRD; Bratcher, Mike, EMNRD; '[stucker@blm.gov](mailto:stucker@blm.gov)'; Amos, James ([iamos@blm.gov](mailto:iamos@blm.gov))

**Cc:** Amanda Trujillo Davis

**Subject:** (Work Plan) Big Papi Federal Com #2 (30-015-37833)

Mr. Bratcher/Mrs. Patterson,

Attached for your consideration is a copy of a work plan for the Big Papi Federal Com #1. Please feel free to contact me with any questions or concerns.

Thanks!

**Lupe Carrasco**

Environmental Coordinator

Concho Resources

Cell: 575-725-0787

Office: 575-748-6933

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

1401 Commerce Drive

Carlsbad, NM 88220



CONFIDENTIALITY NOTICE: The information in this email may be confidential and/or privileged. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this email and its attachments, if any, or the information herein, is prohibited. If you received this email in error, please immediately notify the sender by return email and delete this email from your system. Thank you.

---

**From:** Amanda Trujillo  
**Sent:** Tuesday, September 22, 2015 4:19 PM  
**To:** Tucker, Shelly  
**Cc:** Heather Patterson; [Mike.Bratcher@state.nm.us](mailto:Mike.Bratcher@state.nm.us); [James\\_Amos@blm.gov](mailto:James_Amos@blm.gov)  
**Subject:** RE: (C-141 Initial) Big Papi Federal Com #2 (30-015-37833)

Shelly,

The Big Papi had sampling scheduled for tomorrow but was rescheduled due to rain. We will submit a workplan for approval once delineation is complete. Please feel free to contact me if you have any additional questions.

Thank you,

**Amanda Trujillo**

Senior Environmental Coordinator

COG Operating LLC

Cell: 505.350.1336

Office: 575.748.6930

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

2407 Pecos Ave.

Artesia , NM 88210



CONFIDENTIALITY NOTICE: The information in this email may be confidential and/or privileged. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this email and its attachments, if any, or the information herein, is prohibited. If you received this email in error, please immediately notify the sender by return email and delete this email from your system. Thank you.

**From:** Tucker, Shelly [<mailto:stucker@blm.gov>]  
**Sent:** Monday, September 14, 2015 9:18 AM  
**To:** Amanda Trujillo  
**Cc:** Heather Patterson; [Mike.Bratcher@state.nm.us](mailto:Mike.Bratcher@state.nm.us); [James.Amos@blm.gov](mailto:James.Amos@blm.gov)  
**Subject:** Re: (C-141 Initial) Big Papi Federal Com #2 (30-015-37833)

Morning! Hope you all had a great weekend. I was checking on the status of this clean-up....  
Have you designed a CAP?

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

Sincerely,

*Shelly J Tucker*

Environmental Protection Specialist

Bureau of Land Management

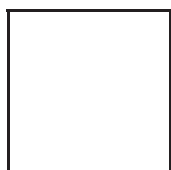
620 E. Greene St

Carlsbad, NM 88220

575.234.5905 - Direct

575.361.0084 - Cellular

[stucker@blm.gov](mailto:stucker@blm.gov)



On Fri, Aug 28, 2015 at 9:30 PM, Amanda Trujillo <[ATrujillo@concho.com](mailto:ATrujillo@concho.com)> wrote:

Mr. Bratcher,

Attached is a C-141 for your consideration. Please feel free to call me if you have any additional questions.

Thank you,

**Amanda Trujillo**

Senior Environmental Coordinator

COG Operating LLC

Cell: 505.350.1336

Office: 575.748.6930

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

2407 Pecos Ave.

Artesia , NM 88210



CONFIDENTIALITY NOTICE: The information in this email may be confidential and/or privileged. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this email and its attachments, if any, or the information herein, is prohibited. If you received this email in error, please immediately notify the sender by return email and delete this email from your system. Thank you.

---

**From:** Lupe Carrasco

**Sent:** Saturday, August 08, 2015 2:18 PM

**To:** NMOCD; Patterson, Heather, EMNRD; James Amos; [stucker@blm.gov](mailto:stucker@blm.gov)

**Subject:** Fwd: (Notification) Big Papi Federal Com #2 (30-015-37833)

Sent via the Samsung Galaxy S®6 active, an AT&T 4G LTE smartphone

Mr. Bratcher,

COG Operating LLC is reporting a release on the [Big Papi Federal Com #2 \(30-015-37833\)](#).

Unit C Section 04 Township 26S Range 29E

The release occurred at 7:00 am on 8/7/2015.

Released: 125 bbls PW

Recovered: 120 bbls PW

The release was caused by by a poly line failure impacting the lease road and the nearby pasture. The area is being evaluated and a C-141 will be submitted. If you have any additional questions please feel free to contact me.

Thank you,

**Amanda Trujillo**

Senior Environmental Coordinator

COG Operating LLC

Cell: [505.350.1336](tel:505.350.1336)

Office: [575.748.6930](tel:575.748.6930)

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

[2407 Pecos Ave.](#)

[Artesia , NM 88210](#)

CONFIDENTIALITY NOTICE: The information in this email may be confidential and/or privileged. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this email and its attachments, if any, or the information herein, is prohibited. If you received this email in error, please immediately notify the sender by return email and delete this email from your system. Thank you.

CONFIDENTIALITY NOTICE: The information in this email may be confidential and/or privileged. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified

that any review, dissemination or copying of this email and its attachments, if any, or the information contained herein, is prohibited. If you have received this email in error, please immediately notify the sender by return email and delete this email from your system. Thank you.



**From:** [Robert Grubbs](#)  
**To:** [Bratcher, Mike, EMNRD](#); [Patterson, Heather, EMNRD](#)  
**Cc:** ["james\\_amos@blm.gov"](mailto:james_amos@blm.gov) ([james\\_amos@blm.gov](mailto:james_amos@blm.gov))  
**Subject:** (Closure) Big Papi Federal Com #2 (30-015-37833)  
**Date:** Monday, March 21, 2016 3:39:47 PM  
**Attachments:** image002.png  
(Closure) Big Papi Federal Com #2 (30-015-37833).pdf

---

MR. BRATCHER,

ATTACHED FOR YOUR CONSIDERATION IS A COPY OF A CLOSURE LETTER ALONG WITH A C-141 FINAL FOR THE BIG PAPI FEDERAL COM #2. PLEASE FEEL FREE TO CONTACT ME WITH ANY QUESTIONS OR CONCERNS.

**THANK YOU,**

**ROBERT GRUBBS JR.**  
**SR. ENVIRONMENTAL COORDINATOR**  
432.683.7443 (MAIN)  
432.818.2369 (DIRECT)  
432.961.8801 (CELL)  
432.221.0892 (FAX)  
[RGRUBBS@CONCHO.COM](mailto:RGRUBBS@CONCHO.COM)  
MAILING ADDRESS:  
ONE CONCHO CENTER  
600 W. ILLINOIS AVENUE  
MIDLAND, TEXAS 79701

**CONFIDENTIALITY NOTICE: THE INFORMATION IN THIS EMAIL MAY BE CONFIDENTIAL AND/OR PRIVILEGED. IF YOU ARE NOT THE INTENDED RECIPIENT OR AN AUTHORIZED REPRESENTATIVE OF THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY REVIEW, DISSEMINATION OR COPYING OF THIS EMAIL AND ITS ATTACHMENTS, IF ANY, OR THE INFORMATION HEREIN, IS PROHIBITED. IF YOU RECEIVED THIS EMAIL IN ERROR, PLEASE IMMEDIATELY NOTIFY THE SENDER BY RETURN EMAIL AND DELETE THIS EMAIL FROM YOUR SYSTEM. THANK YOU.**



CONFIDENTIALITY NOTICE: The information in this email may be confidential and/or privileged. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this email and its attachments, if any, or the information contained herein, is prohibited. If you have received this email in error, please immediately notify the sender by return email and delete this email from your system. Thank you.

**From:** Patterson, Heather, EMNRD  
**To:** "Robert Grubbs"  
**Cc:** "james\_amos@blm.gov" (james\_amos@blm.gov); Tucker, Shelly; Bratcher, Mike, EMNRD  
**Subject:** RE: (Closure) Big Papi Federal Com #2 (30-015-37833)  
**Date:** Monday, March 28, 2016 9:41:00 AM  
**Attachments:** image004.png

---

Mr. Grubbs,

Your work plan approval was only for a partial remediation, with the rest of the work to be deferred. The OCD requests an additional plan on how and when COG proposes to complete the remediation.

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.

If you have any questions or concerns, and for notification, please contact me.

Thank you,

Heather Patterson  
Environmental Specialist  
NMOCD District II  
Office (575)748-1283 ext.101  
Cell (575)703-0228

---

**From:** Robert Grubbs [mailto:RGrubbs@concho.com]  
**Sent:** Monday, March 21, 2016 3:40 PM  
**To:** Bratcher, Mike, EMNRD; Patterson, Heather, EMNRD  
**Cc:** 'james\_amos@blm.gov' (james\_amos@blm.gov)  
**Subject:** (Closure) Big Papi Federal Com #2 (30-015-37833)

MR. BRATCHER,

ATTACHED FOR YOUR CONSIDERATION IS A COPY OF A CLOSURE LETTER ALONG WITH A C-141 FINAL FOR THE BIG PAPI FEDERAL COM #2. PLEASE FEEL FREE TO CONTACT ME WITH ANY QUESTIONS OR CONCERNS.

**THANK YOU,**

**ROBERT GRUBBS JR.**  
**SR. ENVIRONMENTAL COORDINATOR**  
432.683.7443 (MAIN)  
432.818.2369 (DIRECT)  
432.661.6601 (CELL)  
432.221.0892 (FAX)  
**RGRUBBS@CONCHO.COM**  
MAILING ADDRESS:  
ONE CONCHO CENTER  
600 W. ILLINOIS AVENUE  
MIDLAND, TEXAS 79701

**CONFIDENTIALITY NOTICE: THE INFORMATION IN THIS EMAIL MAY BE CONFIDENTIAL AND/OR PRIVILEGED. IF YOU ARE NOT THE INTENDED RECIPIENT OR AN AUTHORIZED REPRESENTATIVE OF THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY REVIEW, DISSEMINATION OR COPYING OF THIS EMAIL AND ITS ATTACHMENTS, IF ANY, OR THE INFORMATION HEREIN, IS PROHIBITED. IF YOU RECEIVED THIS EMAIL IN ERROR, PLEASE IMMEDIATELY NOTIFY THE SENDER BY RETURN EMAIL AND DELETE THIS EMAIL FROM YOUR SYSTEM. THANK YOU.**



CONFIDENTIALITY NOTICE: The information in this email may be confidential and/or privileged. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this email and its attachments, if any, or the information contained herein, is prohibited. If you have received this email in error, please immediately notify the sender by return email and delete this email from your system. Thank you.

**From:** [Tucker, Shelly](#)  
**To:** [Robert Grubbs](#)  
**Cc:** [Bratcher, Mike, EMNRD](#); [Patterson, Heather, EMNRD](#); [Robert McNeill](#); [Pat Ellis](#)  
**Subject:** Re: (Closure) Big Papi Federal Com #2 (30-015-37833)  
**Date:** Monday, April 25, 2016 11:43:25 AM  
**Attachments:** image004.png

---

The BLM is also requesting an additional plan to address the remaining impact.

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

Sincerely,

*Shelly J Tucker*

Environmental Protection Specialist  
Bureau of Land Management

620 E. Greene St  
Carlsbad, NM 88220

575.234.5905 - Direct  
575.361.0084 - Cellular

[stucker@blm.gov](mailto:stucker@blm.gov)



The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. In such an event that the location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until the contaminant issues are fully mitigated and the location is successfully reclaimed. In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

**Confidentiality Warning:** This message along with any attachments are intended only for use of the individual or entity to which it is addressed and may contain information that is privileged or confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately.

On Mon, Mar 28, 2016 at 9:42 AM, Patterson, Heather, EMNRD  
<[Heather.Patterson@state.nm.us](mailto:Heather.Patterson@state.nm.us)> wrote:

Mr. Grubbs,

Your work plan approval was only for a partial remediation, with the rest of the work to be deferred. The OCD requests an additional plan on how and when COG proposes to complete the remediation.

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.

If you have any questions or concerns, and for notification, please contact me.

Thank you,

Heather Patterson

Environmental Specialist

NMOCD District II

Office (575)748-1283 ext.101

Cell (575)703-0228

---

**From:** Robert Grubbs [mailto:[RGrubbs@concho.com](mailto:RGrubbs@concho.com)]

**Sent:** Monday, March 21, 2016 3:40 PM

**To:** Bratcher, Mike, EMNRD; Patterson, Heather, EMNRD

**Cc:** 'james\_amos@blm.gov' ([james\\_amos@blm.gov](mailto:james_amos@blm.gov))

**Subject:** (Closure) Big Papi Federal Com #2 (30-015-37833)

MR. BRATCHER,

ATTACHED FOR YOUR CONSIDERATION IS A COPY OF A CLOSURE LETTER  
ALONG WITH A C-141 FINAL FOR THE BIG PAPI FEDERAL COM #2.  
PLEASE FEEL FREE TO CONTACT ME WITH ANY QUESTIONS OR  
CONCERNS.

THANK YOU,

**ROBERT GRUBBS JR.**

**SR. ENVIRONMENTAL COORDINATOR**

**432.683.7443 (MAIN)**

**432.818.2369 (DIRECT)**

**432.661.6601 (CELL)**

**432.221.0892 (FAX)**

**[RGRUBBS@CONCHO.COM](mailto:RGRUBBS@CONCHO.COM)**

**MAILING ADDRESS:**

**ONE CONCHO CENTER**

**600 W. ILLINOIS AVENUE**

**MIDLAND, TEXAS 79701**

**CONFIDENTIALITY NOTICE: THE INFORMATION IN THIS EMAIL MAY BE CONFIDENTIAL AND/OR PRIVILEGED. IF YOU ARE NOT THE INTENDED RECIPIENT OR AN AUTHORIZED REPRESENTATIVE OF THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY REVIEW, DISSEMINATION OR COPYING OF THIS EMAIL AND ITS ATTACHMENTS, IF ANY, OR THE INFORMATION HEREIN, IS PROHIBITED. IF YOU RECEIVED THIS EMAIL IN ERROR, PLEASE IMMEDIATELY NOTIFY THE SENDER BY RETURN EMAIL AND DELETE THIS EMAIL FROM YOUR SYSTEM. THANK YOU.**



CONFIDENTIALITY NOTICE: The information in this email may be confidential and/or privileged. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this email and its attachments, if any, or the information contained herein, is prohibited. If you have received this email in error, please immediately notify the sender by return email and delete this email from your system. Thank you.

**From:** [Tucker, Shelly](#)  
**To:** [Amanda Trujillo Davis](#)  
**Cc:** [Patterson, Heather, EMNRD](#); [Bratcher, Mike, EMNRD](#); [James\\_Amos@blm.gov](mailto:James_Amos@blm.gov); [Robert McNeill](#)  
**Subject:** Re: (Work Plan- Part 2 Monitoring) Big Papi Federal Com #2 (30-015-37833)  
**Date:** Wednesday, July 13, 2016 10:19:19 AM  
**Attachments:** [image003.png](#)  
[image002.png](#)

---

BLM will agree to the monitoring plan.

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

Sincerely,

*Shelly J Tucker*

Environmental Protection Specialist  
Bureau of Land Management

620 E. Greene St  
Carlsbad, NM 88220

575.234.5905 - Direct  
575.361.0084 - Cellular

[stucker@blm.gov](mailto:stucker@blm.gov)



The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. In such an event that the location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until the contaminant issues are fully mitigated and the location is successfully reclaimed. In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

**Confidentiality Warning:** This message along with any attachments are intended only for use of the individual or entity to which it is addressed and may contain information that is privileged or confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately.

On Mon, Jul 11, 2016 at 1:01 PM, Amanda Trujillo Davis <[ATrujillo@concho.com](mailto:ATrujillo@concho.com)> wrote:

Mr. Bratcher/Ms. Tucker,

In response to the request for the part 2 of partial work plan, I am submitting the attached work plan for your consideration. Please feel free to contact me if you have any questions or concerns.

Thank you,

**Amanda Trujillo Davis**

Senior Environmental Coordinator

COG Operating LLC

Cell: 505.350.1336

Office: 575.748.6930

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

1401 Commerce Drive

Carlsbad, NM 88220



CONFIDENTIALITY NOTICE: The information in this email may be confidential and/or privileged. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this email and its attachments, if any, or the information herein, is prohibited. If you received this email in error, please immediately notify the sender by return email and delete this email from your system. Thank you.



----- Original message -----

From: "Patterson, Heather, EMNRD" <[Heather.Patterson@state.nm.us](mailto:Heather.Patterson@state.nm.us)>

Date: 3/28/2016 10:42 AM (GMT-06:00)

To: Robert Grubbs <[RGrubbs@concho.com](mailto:RGrubbs@concho.com)>

Cc: "'[james\\_amos@blm.gov](mailto:james_amos@blm.gov)' ([james\\_amos@blm.gov](mailto:james_amos@blm.gov))" <[james\\_amos@blm.gov](mailto:james_amos@blm.gov)>, "Tucker, Shelly" <[stucker@blm.gov](mailto:stucker@blm.gov)>, "Bratcher, Mike, EMNRD" <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

Subject: [External] RE: (Closure) Big Papi Federal Com #2 (30-015-37833)

\*\*\*\* External email. Use caution. \*\*\*\*



Mr. Grubbs,

Your work plan approval was only for a partial remediation, with the rest of the work to be deferred. The OCD requests an additional plan on how and when COG proposes to complete the remediation.

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.

If you have any questions or concerns, and for notification, please contact me.

Thank you,

Heather Patterson

Environmental Specialist

NMOCD District II

Office (575)748-1283 ext.101

Cell (575)703-0228

---

**From:** Robert Grubbs [<mailto:RGrubbs@concho.com>]

**Sent:** Monday, March 21, 2016 3:40 PM

**To:** Bratcher, Mike, EMNRD; Patterson, Heather, EMNRD

**Cc:** 'james\_amos@blm.gov' ([james\\_amos@blm.gov](mailto:james_amos@blm.gov))

**Subject:** (Closure) Big Papi Federal Com #2 (30-015-37833)

MR. BRATCHER,

ATTACHED FOR YOUR CONSIDERATION IS A COPY OF A CLOSURE LETTER  
ALONG WITH A C-141 FINAL FOR THE BIG PAPI FEDERAL COM #2.  
PLEASE FEEL FREE TO CONTACT ME WITH ANY QUESTIONS OR  
CONCERNS.

**THANK YOU,**

**ROBERT GRUBBS JR.**

**SR. ENVIRONMENTAL COORDINATOR**

**432.683.7443 (MAIN)**

**432.818.2369 (DIRECT)**

**432.661.6601 (CELL)**

**432.221.0892 (FAX)**

**[RGRUBBS@CONCHO.COM](mailto:RGRUBBS@CONCHO.COM)**

**MAILING ADDRESS:**

**ONE CONCHO CENTER**

**600 W. ILLINOIS AVENUE**

**MIDLAND, TEXAS 79701**

**CONFIDENTIALITY NOTICE: THE INFORMATION IN THIS EMAIL MAY BE  
CONFIDENTIAL AND/OR PRIVILEGED. IF YOU ARE NOT THE INTENDED  
RECIPIENT OR AN AUTHORIZED REPRESENTATIVE OF THE INTENDED**

RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY REVIEW, DISSEMINATION OR COPYING OF THIS EMAIL AND ITS ATTACHMENTS, IF ANY, OR THE INFORMATION HEREIN, IS PROHIBITED. IF YOU RECEIVED THIS EMAIL IN ERROR, PLEASE IMMEDIATELY NOTIFY THE SENDER BY RETURN EMAIL AND DELETE THIS EMAIL FROM YOUR SYSTEM. THANK YOU.



CONFIDENTIALITY NOTICE: The information in this email may be confidential and/or privileged. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this email and its attachments, if any, or the information contained herein, is prohibited. If you have received this email in error, please immediately notify the sender by return email and delete this email from your system. Thank you.

**From:** Patterson, Heather, EMNRD  
**To:** ["Amanda Trujillo Davis"](#); [Bratcher, Mike, EMNRD](#); [James\\_Amos@blm.gov](mailto:James_Amos@blm.gov); [Shelly Tucker](#)  
**Cc:** [Robert McNeill](#); [Bayliss, Randolph, EMNRD](#)  
**Subject:** RE: (Work Plan- Part 2 Monitoring) Big Papi Federal Com #2 (30-015-37833)  
**Date:** Friday, July 22, 2016 8:38:00 AM  
**Attachments:** image002.png  
image003.png

---

RE: COG \* Big Papi Fed Com #3H \* 30-015-37833 \* 2RP-3228

Amanda,

The OCD approves this monitoring plan, thank you for developing this.

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.

If you have any questions or concerns, and for notification, please contact me.

Heather Patterson  
Environmental Specialist  
NMOCD District II  
Office (575)748-1283 ext.101  
Cell (575)703-0228

---

**From:** Amanda Trujillo Davis [<mailto:ATrujillo@concho.com>]  
**Sent:** Monday, July 11, 2016 1:01 PM  
**To:** Patterson, Heather, EMNRD; Bratcher, Mike, EMNRD; [James\\_Amos@blm.gov](mailto:James_Amos@blm.gov); Shelly Tucker  
**Cc:** Robert McNeill  
**Subject:** (Work Plan- Part 2 Monitoring) Big Papi Federal Com #2 (30-015-37833)

Mr. Bratcher/Ms. Tucker,

In response to the request for the part 2 of partial work plan, I am submitting the attached work plan for your consideration. Please feel free to contact me if you have any questions or concerns.

Thank you,

**Amanda Trujillo Davis**  
Senior Environmental Coordinator  
COG Operating LLC  
Cell: 505.350.1336  
Office: 575.748.6930  
[atrujillo@concho.com](mailto:atrujillo@concho.com)

1401 Commerce Drive

Carlsbad, NM 88220



CONFIDENTIALITY NOTICE: The information in this email may be confidential and/or privileged. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this email and its attachments, if any, or the information herein, is prohibited. If you received this email in error, please immediately notify the sender by return email and delete this email from your system. Thank you.

----- Original message -----

From: "Patterson, Heather, EMNRD" <[Heather.Patterson@state.nm.us](mailto:Heather.Patterson@state.nm.us)>

Date: 3/28/2016 10:42 AM (GMT-06:00)

To: Robert Grubbs <[RGrubbs@concho.com](mailto:RGrubbs@concho.com)>

Cc: "james\_amos@blm.gov" ([james\\_amos@blm.gov](mailto:james_amos@blm.gov))" <[james\\_amos@blm.gov](mailto:james_amos@blm.gov)>, "Tucker, Shelly" <[stucker@blm.gov](mailto:stucker@blm.gov)>, "Bratcher, Mike, EMNRD" <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

Subject: [External] RE: (Closure) Big Papi Federal Com #2 (30-015-37833)

\*\*\*\* External email. Use caution. \*\*\*\*

Mr. Grubbs,

Your work plan approval was only for a partial remediation, with the rest of the work to be deferred. The OCD requests an additional plan on how and when COG proposes to complete the remediation.

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.

If you have any questions or concerns, and for notification, please contact me.

Thank you,

Heather Patterson  
Environmental Specialist

NMOCD District II  
Office (575)748-1283 ext.101  
Cell (575)703-0228

---

**From:** Robert Grubbs [<mailto:RGrubbs@concho.com>]  
**Sent:** Monday, March 21, 2016 3:40 PM  
**To:** Bratcher, Mike, EMNRD; Patterson, Heather, EMNRD  
**Cc:** 'james\_amos@blm.gov' ([james\\_amos@blm.gov](mailto:james_amos@blm.gov))  
**Subject:** (Closure) Big Papi Federal Com #2 (30-015-37833)

MR. BRATCHER,

ATTACHED FOR YOUR CONSIDERATION IS A COPY OF A CLOSURE LETTER  
ALONG WITH A C-141 FINAL FOR THE BIG PAPI FEDERAL COM #2. PLEASE  
FEEL FREE TO CONTACT ME WITH ANY QUESTIONS OR CONCERNS.

**THANK YOU,**

**ROBERT GRUBBS JR.**  
**SR. ENVIRONMENTAL COORDINATOR**  
432.683.7443 (MAIN)  
432.818.2369 (DIRECT)  
432.991.8801 (CELL)  
432.221.0892 (FAX)  
[RGRUBBS@CONCHO.COM](mailto:RGRUBBS@CONCHO.COM)  
MAILING ADDRESS:  
ONE CONCHO CENTER  
600 W. ILLINOIS AVENUE  
MIDLAND, TEXAS 79701

**CONFIDENTIALITY NOTICE: THE INFORMATION IN THIS EMAIL MAY BE  
CONFIDENTIAL AND/OR PRIVILEGED. IF YOU ARE NOT THE INTENDED  
RECIPIENT OR AN AUTHORIZED REPRESENTATIVE OF THE INTENDED  
RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY REVIEW, DISSEMINATION  
OR COPYING OF THIS EMAIL AND ITS ATTACHMENTS, IF ANY, OR THE  
INFORMATION HEREIN, IS PROHIBITED. IF YOU RECEIVED THIS EMAIL IN  
ERROR, PLEASE IMMEDIATELY NOTIFY THE SENDER BY RETURN EMAIL AND  
DELETE THIS EMAIL FROM YOUR SYSTEM. THANK YOU.**



CONFIDENTIALITY NOTICE: The information in this email may be confidential and/or privileged. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this email and its attachments, if any, or the information contained herein, is prohibited. If you have received this email in error, please immediately notify the sender by return email and delete this email from your system. Thank you.



## **APPENDIX C**

# **ASSI Monitoring Report (December 2017)**



## MONITORING PLAN

Property:

**Concho Operating, LLC.  
Big Papi Fed Com #2H  
Eddy County, New Mexico  
Unit Letter "C", Section 4, Township 26 South, Range 29 East  
Latitude 32.072767, Longitude -103.986052  
2RP-3228**

December 2017

Prepared for:

**Concho Operating, LLC.  
600 West Illinois Avenue  
Midland, TX 79701  
Attn: Mrs. Rebecca Haskell**

Prepared by:

---

Ryan Reich  
Environmental Project Manager

---

Thomas Franklin  
Environmental Manager

## MONITORING PLAN

Concho Operating, LLC.  
Big Papi Fed Com #2H  
Eddy County, New Mexico  
Unit Letter “C”, Section 4, Township 26 South, Range 29 East  
Latitude 32.072767, Longitude -103.986052  
2RP-3228

December 2017

### Drilling Activities

On July 27<sup>th</sup>, 2017 ASSI personnel were present to collect confirmation samples utilizing an air rotary drilling rig. Mr. Mike Dial, an ASSI environmental professional, was present to document onsite activities.

Four (4) soil bores (S8, MP1, S7 and MP2) were advanced in order to collect confirmation samples at predetermined depths. A total of four (4) samples were collected and were analyzed for Chloride. Discrete samples were collected from S7 at a depth of 11'-12', MP1 at a depth of 11'-12', S8 at a depth of 3'-4' and MP2 at a depth of 11'-12'. Soil was field screened for Chloride utilizing electro conductivity during drilling operations.

### Soil Sampling Analytical Results

Analytical results were compared to the NMOCD *Guidelines for Remediation of Leaks, Spills and Releases* (Section VI A. Contaminated Soils) and show that no Chloride exceedances exist in soil above the NMOCD clean-up goals. Each location meets the NMOCD's threshold of 250 mg/Kg satisfying clean-up goal criteria.

### Laboratory Analytical Methods

The samples were analyzed for Chloride utilizing EPA method SW-846 300.1. Copies of the laboratory analysis are provided.

Soil was collected in laboratory prepared glassware, placed on ice, and packed in a cooler. The sample coolers and completed chain-of-custody forms were relinquished to Xenco Laboratories in Midland, Texas for normal turn-around time.

TABLE 1 Summary of Confirmation Sampling Analytical Results Concentrations of Chloride in Soil Concho Operating, LLC Big Papi Fed Com #2H Eddy County, New Mexico NMOCD REF: 2RP-3228				
SAMPLE LOCATION	SAMPLE DEPTH (bgs)	SAMPLE DATE	SOIL STATUS	600.0
				CHLORIDE (mg/kg)
NMOCD - Guidelines for Remediation of Leaks, Spills and Releases				
Confirmation Sampling				
S7	11-12'	7/27/2017	In-Situ	<4.99
MP1	11-12'	7/27/2017	In-Situ	13
S8	3-4'	7/27/2017	In-Situ	<5.00
MP2	11-12'	7/27/2017	In-Situ	<4.98

mg/Kg - milligrams per Kilogram

Concentrations in **BOLD** exceed the NMOCD Guidelines



Certificate of Analysis Summary 558754  
American Safety Services, Odessa, TX  
Project Name: Big Papi Fed Com #2H(Long Term)



Date Received in Lab: Fri Jul-28-17 08:50 am  
Report Date: 12-DEC-17  
Project Manager: Brandi Ritcherson

Project Id:  
Contact: Thomas Franklin  
Project Location: Eddy Co.NM

<b>Analysis Requested</b>	<b>Lab Id:</b>	558754-001	558754-002	558754-003	558754-004
	<b>Field Id:</b>	S8	MP1	S7	MP2
	<b>Depth:</b>	3-4	11-12	11-12	11-12
	<b>Matrix:</b>	SOIL	SOIL	SOIL	SOIL
	<b>Sampled:</b>	Jul-27-17 10:30	Jul-27-17 10:10	Jul-27-17 10:00	Jul-27-17 10:50
<b>Inorganic Anions by EPA 300/300.1</b>	<b>Extracted:</b>	Aug-01-17 09:00	Aug-01-17 09:00	Aug-01-17 09:00	Aug-01-17 09:00
	<b>Analyzed:</b>	Aug-01-17 10:51	Aug-01-17 10:58	Aug-01-17 11:06	Aug-01-17 11:29
	<b>Units/RL:</b>	mg/kg RL <5.00 5.00	mg/kg RL 13.1 4.99	mg/kg RL <4.99 4.99	mg/kg RL <4.98 4.98
Chloride					

This analytical report, and the entire data package it represents, has been made for your exclusive and confidential use. The interpretations and results expressed throughout this analytical report represent the best judgment of XENCO Laboratories. XENCO Laboratories assumes no responsibility and makes no warranty to the end use of the data hereby presented. Our liability is limited to the amount invoiced for this work order unless otherwise agreed to in writing.

Houston - Dallas - San Antonio - Atlanta - Tampa - Boca Raton - Latin America - Odessa - Corpus Christi

Brandi Ritcherson

Brandi Ritcherson  
Project Manager



# Analytical Report 558754

for  
American Safety Services

Project Manager: Thomas Franklin

Big Papi Fed Com #2H(Long Term)

12-DEC-17

Collected By: Client



1211 W. Florida Ave, Midland TX 79701

Xenco-Houston (EPA Lab code: TX00122):

Texas (T104704215-17-23), Arizona (AZ0765), Florida (E871002-24), Louisiana (03054)  
Oklahoma (2017-142)

Xenco-Dallas (EPA Lab code: TX01468):

Texas (T104704295-17-15), Arizona (AZ0809), Arkansas (17-063-0)

Xenco-El Paso (EPA Lab code: TX00127): Texas (T104704221-17-12)

Xenco-Lubbock (EPA Lab code: TX00139): Texas (T104704219-17-16)

Xenco-Odessa (EPA Lab code: TX00158): Texas (T104704400-17-13)

Xenco-San Antonio (EPA Lab Code: TNI02385): Texas (T104704534-17-3)

Xenco Phoenix (EPA Lab Code: AZ00901): Arizona(AZ0757)

Xenco-Phoenix Mobile (EPA Lab code: AZ00901): Arizona (AZM757)



12-DEC-17

Project Manager: **Thomas Franklin**  
**American Safety Services**  
8715 Andrews Hwy  
Odessa, TX 79765

Reference: XENCO Report No(s): **558754**  
**Big Papi Fed Com #2H(Long Term)**  
Project Address: Eddy Co.NM

**Thomas Franklin:**

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the XENCO Report Number(s) 558754. All results being reported under this Report Number apply to the samples analyzed and properly identified with a Laboratory ID number. Subcontracted analyses are identified in this report with either the NELAC certification number of the subcontract lab in the analyst ID field, or the complete subcontracted report attached to this report.

Unless otherwise noted in a Case Narrative, all data reported in this Analytical Report are in compliance with NELAC standards. The uncertainty of measurement associated with the results of analysis reported is available upon request. Should insufficient sample be provided to the laboratory to meet the method and NELAC Matrix Duplicate and Matrix Spike requirements, then the data will be analyzed, evaluated and reported using all other available quality control measures.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by XENCO Laboratories. This report will be filed for at least 5 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in Report No. 558754 will be filed for 45 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting XENCO Laboratories to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

A handwritten signature in black ink that reads 'Brandi Ritcherson'.

---

**Brandi Ritcherson**

Project Manager

***Recipient of the Prestigious Small Business Administration Award of Excellence in 1994.***

*Certified and approved by numerous States and Agencies.*

*A Small Business and Minority Status Company that delivers SERVICE and QUALITY*

Houston - Dallas - Midland - San Antonio - Phoenix - Oklahoma - Latin America

**Sample Cross Reference 558754****American Safety Services, Odessa, TX**

Big Papi Fed Com #2H(Long Term)

Sample Id	Matrix	Date Collected	Sample Depth	Lab Sample Id
S8	S	07-27-17 10:30	3 - 4	558754-001
MP1	S	07-27-17 10:10	11 - 12	558754-002
S7	S	07-27-17 10:00	11 - 12	558754-003
MP2	S	07-27-17 10:50	11 - 12	558754-004



## CASE NARRATIVE

*Client Name: American Safety Services*

*Project Name: Big Papi Fed Com #2H(Long Term)*

Project ID:

Work Order Number(s): 558754

Report Date: 12-DEC-17

Date Received: 07/28/2017

---

**Sample receipt non conformances and comments:**

---

**Sample receipt non conformances and comments per sample:**

None



## Certificate of Analytical Results 558754



## American Safety Services, Odessa, TX

## Big Papi Fed Com #2H(Long Term)

Sample Id: S8 Matrix: Soil Date Received: 07.28.17 08.50  
Lab Sample Id: 558754-001 Date Collected: 07.27.17 10.30 Sample Depth: 3 - 4  
Analytical Method: Inorganic Anions by EPA 300/300.1 Prep Method: E300P  
Tech: MGO % Moisture:  
Analyst: MGO Date Prep: 08.01.17 09.00 Basis: Wet Weight  
Seq Number: 3023691

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	<5.00	5.00	mg/kg	08.01.17 10.51	U	1





## Certificate of Analytical Results 558754



## American Safety Services, Odessa, TX

## Big Papi Fed Com #2H(Long Term)

Sample Id: **MP1** Matrix: Soil Date Received: 07.28.17 08.50  
Lab Sample Id: 558754-002 Date Collected: 07.27.17 10.10 Sample Depth: 11 - 12  
Analytical Method: Inorganic Anions by EPA 300/300.1 Prep Method: E300P  
Tech: MGO % Moisture:  
Analyst: MGO Date Prep: 08.01.17 09.00 Basis: Wet Weight  
Seq Number: 3023691

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	13.1	4.99	mg/kg	08.01.17 10.58		1



## Certificate of Analytical Results 558754



## American Safety Services, Odessa, TX

## Big Papi Fed Com #2H(Long Term)

Sample Id: S7  
Lab Sample Id: 558754-003

Matrix: Soil  
Date Collected: 07.27.17 10.00

Date Received: 07.28.17 08.50  
Sample Depth: 11 - 12

Analytical Method: Inorganic Anions by EPA 300/300.1

Prep Method: E300P

Tech: MGO

% Moisture:

Analyst: MGO

Date Prep: 08.01.17 09.00

Basis: Wet Weight

Seq Number: 3023691

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	<4.99	4.99	mg/kg	08.01.17 11.06	U	1



## Certificate of Analytical Results 558754



## American Safety Services, Odessa, TX

## Big Papi Fed Com #2H(Long Term)

Sample Id: **MP2**  
Lab Sample Id: 558754-004

Matrix: Soil  
Date Collected: 07.27.17 10.50

Date Received: 07.28.17 08.50  
Sample Depth: 11 - 12

Analytical Method: Inorganic Anions by EPA 300/300.1

Prep Method: E300P

Tech: MGO

% Moisture:

Analyst: MGO

Date Prep: 08.01.17 09.00

Basis: Wet Weight

Seq Number: 3023691

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	<4.98	4.98	mg/kg	08.01.17 11.29	U	1



## Flagging Criteria



- X** In our quality control review of the data a QC deficiency was observed and flagged as noted. MS/MSD recoveries were found to be outside of the laboratory control limits due to possible matrix /chemical interference, or a concentration of target analyte high enough to affect the recovery of the spike concentration. This condition could also affect the relative percent difference in the MS/MSD.
- B** A target analyte or common laboratory contaminant was identified in the method blank. Its presence indicates possible field or laboratory contamination.
- D** The sample(s) were diluted due to targets detected over the highest point of the calibration curve, or due to matrix interference. Dilution factors are included in the final results. The result is from a diluted sample.
- E** The data exceeds the upper calibration limit; therefore, the concentration is reported as estimated.
- F** RPD exceeded lab control limits.
- J** The target analyte was positively identified below the quantitation limit and above the detection limit.
- U** Analyte was not detected.
- L** The LCS data for this analytical batch was reported below the laboratory control limits for this analyte. The department supervisor and QA Director reviewed data. The samples were either reanalyzed or flagged as estimated concentrations.
- H** The LCS data for this analytical batch was reported above the laboratory control limits. Supporting QC Data were reviewed by the Department Supervisor and QA Director. Data were determined to be valid for reporting.
- K** Sample analyzed outside of recommended hold time.
- JN** A combination of the "N" and the "J" qualifier. The analysis indicates that the analyte is "tentatively identified" and the associated numerical value may not be consistent with the amount actually present in the environmental sample.

\*\* Surrogate recovered outside laboratory control limit.

**BRL** Below Reporting Limit.

**RL** Reporting Limit

**MDL** Method Detection Limit      **SDL** Sample Detection Limit      **LOD** Limit of Detection

**PQL** Practical Quantitation Limit      **SQL** Method Quantitation Limit      **LOQ** Limit of Quantitation

**DL** Method Detection Limit

**NC** Non-Calculable

+ NELAC certification not offered for this compound.

\* (Next to analyte name or method description) = Outside XENCO's scope of NELAC accreditation

***Recipient of the Prestigious Small Business Administration Award of Excellence in 1994.***

*Certified and approved by numerous States and Agencies.*

*A Small Business and Minority Status Company that delivers SERVICE and QUALITY*

Houston - Dallas - San Antonio - Atlanta - Midland/Odessa - Tampa/Lakeland - Phoenix - Latin America

4147 Greenbriar Dr, Stafford, TX 77477  
 9701 Harry Hines Blvd, Dallas, TX 75220  
 5332 Blackberry Drive, San Antonio TX 78238  
 1211 W Florida Ave, Midland, TX 79701  
 2525 W. Huntington Dr. - Suite 102, Tempe AZ 85282

Phone	Fax
(281) 240-4200	(281) 240-4280
(214) 902 0300	(214) 351-9139
(210) 509-3334	(210) 509-3335
(432) 563-1800	(432) 563-1713
(602) 437-0330	



**American Safety Services**  
Big Papi Fed Com #2H(Long Term)

**Analytical Method:** Inorganic Anions by EPA 300/300.1

Seq Number: 3023691

Matrix: Solid

Prep Method: E300P

MB Sample Id: 728529-1-BLK

LCS Sample Id: 728529-1-BKS

Date Prep: 08.01.17

LCSD Sample Id: 728529-1-BS

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	<5.00	250	251	100	249	100	90-110	1	20	mg/kg	08.01.17 10:05	

**Analytical Method:** Inorganic Anions by EPA 300/300.1

Seq Number: 3023691

Matrix: Soil

Prep Method: E300P

Parent Sample Id: 558723-001

MS Sample Id: 558723-001 S

Date Prep: 08.01.17

MSD Sample Id: 558723-001 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	229	250	507	111	508	112	90-110	0	20	mg/kg	08.01.17 10:28	X

MS/MSD Percent Recovery  
Relative Percent Difference  
LCS/LCSD Recovery

$[D] = 100 * (C - A) / B$   
 $RPD = 200 * |(C - E) / (C + E)|$   
 $[D] = 100 * (C) / [B]$

LCS = Laboratory Control Sample  
 A = Parent Result  
 C = MS/LCS Result  
 E = MSD/LCSD Result

MS = Matrix Spike  
 B = Spike Added  
 D = MSD/LCSD % Rec

## CHAIN OF CUSTODY

Page 1 of 1

San Antonio, Texas (210-509-3334)  
Midland, Texas (432-704-5251)

San Antonio, Texas (210-509-3  
Midland, Texas (432-704-5251))

[www.xenco.com](http://www.xenco.com)

Phoenix, Arizona (480-355-0900)

Xenco Quote #

Xenco Job #

558754

Client / Reporting Information						Project Information						Xenoco Quote #	Xenoco Job #																						
Company Name / Branch: American Safety Services Inc. Company Address: 8715 Andrews Hwy Odessa TX 79765						Project Name/Number: <i>Big RPI Fed com #2H</i> Project Location: <i>Eddy Co. NM</i> Invoice To: <i>ATTN: Hassell</i>								8558702																					
Email: <a href="mailto:jfranklin@americansafety.net">jfranklin@americansafety.net</a> <a href="mailto:jimmeman@americansafety.net">jimmeman@americansafety.net</a> Phone No: 432-557-9868						PO Number:																													
Thomas Franklin Samplers Name <i>Mike Divil</i>																																			
No.	Field ID / Point of Collection	Sample Depth	Date	Time	Matrix	# of bottles	HCl	NaOH/Zn Acetate	HNO3	H2SO4	NaOH	NaHSO4	MEOH	NONE	Analytical Information	Matrix Codes																			
1	S8	1'-12'	7/27/17	1000	S	1										W = Water S = Soil/Sed/Solid GW = Ground Water DW = Drinking Water P = Product SW = Surface water OW = Ocean/Sea Water WI = Waste WW = Waste Water A = Air																			
2	MP1	1'-12'	7/27/17	1010	S	1										on ice																			
3	S7	3'-4'	7/27/17	1030	S	1																													
4	MP2	1'-12'	7/27/17	1050	S	1																													
5																																			
6	NFE																																		
7																																			
8																																			
9																																			
10																																			
Turnaround Time (Business days)						Data Deliverable Information						Notes:																							
<input type="checkbox"/> Same Day TAT						<input type="checkbox"/> Level II Std QC						<input type="checkbox"/> Level IV (Full Data Pkg /raw data)						Temp: S.9 IR ILIR-R-8																	
<input type="checkbox"/> Next Day EMERGENCY						<input type="checkbox"/> 7 Day TAT						<input type="checkbox"/> Level III Std QC+ Forms						<input type="checkbox"/> TRRP Level IV						CF:(0-6; -0.2°C)											
<input type="checkbox"/> 2 Day EMERGENCY						<input checked="" type="checkbox"/> Contract TAT						<input type="checkbox"/> Level 3 (CLP Forms)						<input type="checkbox"/> UST / RG -411						(6-23; +0.2°C)											
<input type="checkbox"/> 3 Day EMERGENCY						<input type="checkbox"/> TRRP Checklist																		Corrected Temp: S.7											
TAT Starts Day received by Lab, if received by 5:00 pm												FED-EX, or other tracking #																							
Relinquished by Sampler:												SAMPLE CUSTODY MUST BE DOCUMENTED BELOW EACH TIME SAMPLES CHANGE POSSESSION, INCLUDING COURIER DELIVERY																							
1 Relinquished by: <i>[Signature]</i>												Date Time: 7/27/17 0850 Received By: <i>[Signature]</i>												Date Time: 2 Received By: 2											
3 Relinquished by:												Date Time: 3 Received By: 3												Custody Seal # 4											
5 Relinquished by:												Date Time: 5 Received By: 5												Preserved where applicable On Ice <input checked="" type="checkbox"/> Cooler Temp. Thermo. Corr. Factor											





Client: American Safety Services

Date/ Time Received: 07/28/2017 08:50:00 AM

Work Order #: 558754

Acceptable Temperature Range: 0 - 6 degC

Air and Metal samples Acceptable Range: Ambient

Temperature Measuring device used : R8

## Sample Receipt Checklist

## Comments

#1 *Temperature of cooler(s)?	5.7
#2 *Shipping container in good condition?	Yes
#3 *Samples received on ice?	Yes
#4 *Custody Seal present on shipping container/ cooler?	N/A
#5 *Custody Seals intact on shipping container/ cooler?	N/A
#6 Custody Seals intact on sample bottles?	N/A
#7 *Custody Seals Signed and dated?	N/A
#8 *Chain of Custody present?	Yes
#9 Sample instructions complete on Chain of Custody?	Yes
#10 Any missing/extra samples?	No
#11 Chain of Custody signed when relinquished/ received?	Yes
#12 Chain of Custody agrees with sample label(s)?	Yes
#13 Container label(s) legible and intact?	Yes
#14 Sample matrix/ properties agree with Chain of Custody?	Yes
#15 Samples in proper container/ bottle?	Yes
#16 Samples properly preserved?	Yes
#17 Sample container(s) intact?	Yes
#18 Sufficient sample amount for indicated test(s)?	Yes
#19 All samples received within hold time?	Yes
#20 Subcontract of sample(s)?	No
#21 VOC samples have zero headspace?	N/A

\* Must be completed for after-hours delivery of samples prior to placing in the refrigerator

Analyst:

PH Device/Lot#:

Checklist completed by:

Shawnee Smith

Date: 07/28/2017

Checklist reviewed by:

Brandi Ritcherson

Date: 07/28/2017

**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 167470

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 167470
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
bhall	None	1/4/2023