



Dakota Neel  
HSE Coordinator

December 19, 2017

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

Shelly Tucker  
Bureau of Land Management  
620 E. Green St.  
Carlsbad, NM 88220

**Re: Closure Request Letter  
Burch Keely Unit #936 (2RP-4267)  
Eddy County, NM**

Mr. Bratcher/Ms. Tucker,

COG Operating, LLC is pleased to submit for your consideration the following Closure Request for the Burch Keely Unit #936. This Closure Request letter is in response to the C-141 Initial report dated June 26, 2017 (2RP-4267). All work has been completed in accordance with the work plan submitted and approved by the NMOCD and BLM on October 13, 2017 and November 10, 2017, respectively.

## **BACKGROUND**

This release was caused by a cow that kicked the murphy switch and broke the nipple off resulting in the release of three (3) barrels (bbl.) of produced water and two (2) bbl. of oil. The fluid from the release oversprayed a portion of the location as well as the adjacent pasture. A vacuum truck was immediately dispatched to remove all standing fluids. A crew was dispatched to perform an initial scrape of the area on location and to spray microblaze on the impacted soil and vegetation in the pasture. A work plan was submitted to the NMOCD and BLM on October 4, 2017 and approved by the NMOCD and BLM on October 13, 2017 and November 10, 2017, respectively.

## **REMEDIAL ACTIONS**

The impacted area on location (T1) was excavated to a depth of six (6) inches and no excavation was required in the area of T2. All excavated soils were hauled to an NMOCD approved solid waste disposal facility. The excavation was backfilled with fresh caliche.

### **CORPORATE ADDRESS**

One Concho Center | 600 West Illinois Avenue | Midland, Texas 79701  
PHONE 432.683.7443 | FAX 432.683.7441

### **LOCAL ADDRESS**

Concho West | 2208 Main Street | Artesia, New Mexico 88210  
PHONE 575.748.6940 | FAX 575.746.2096

NMOCD  
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## CLOSURE REQUEST

Based on the information provided, COG Operating, LLC would like to submit the enclosed documents for closure of (2RP-4267). A signed Final C-141 is enclosed for your consideration. Please feel free to contact me with any questions or concerns at (575) 746-2010.

Sincerely,



Dakota Neel  
HSE Coordinator

### Enclosed

1. Work Plan
2. Initial C-141 (Copy)
3. Final C-141

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

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

Form C-141  
Revised August 8, 2011

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

## Release Notification and Corrective Action

### OPERATOR

☐ Initial Report ☒ Final Report

Name of Company: COG Operating LLC OGRID # 229137	Contact: Robert McNeill
Address: 600 West Illinois Avenue, Midland TX 79701	Telephone No. 432-683-7443
Facility Name: Burch Keely Unit #936H	Facility Type: Wellhead
Surface Owner: Federal	Mineral Owner: Federal
API No. 30-015-40888	

### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
M	13	17S	29E	990	South	330	West	Eddy

Latitude 32.8300629 Longitude -104.0357742

### NATURE OF RELEASE

Type of Release: Oil and Produced Water	Volume of Release: 2 bbls Oil & 3 bbls PW	Volume Recovered: 2 bbls Oil & 2 bbls PW
Source of Release: Murphy Switch	Date and Hour of Occurrence: June 24, 2017 7:00 pm	Date and Hour of Discovery: June 24, 2017 7:00 pm
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour:	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*



Describe Cause of Problem and Remedial Action Taken.\*

The release was the result of a cow kicking the murphy switch. The broken nipple was replaced.

Describe Area Affected and Cleanup Action Taken.\*

The release was on location and within the adjacent pasture. A vacuum truck was dispatched to remove all freestanding fluids. All work has been completed in accordance with the work plan submitted and approved by the NMOCD and BLM on October 13, 2017 and November 10, 2017, respectively.

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

Signature: 		<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Dakota Neel		Approved by Environmental Specialist: 	
Title: HSE Coordinator	Approval Date: 6/5/2023	Expiration Date: N/A	
E-mail Address: dneel2@concho.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: December 19, 2017 Phone: 575-746-2010	none		

\* Attach Additional Sheets If Necessary

**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 222842

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 222842
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
bhall	Closure approved under previous rules per the approved workplan.	6/5/2023