

February 8, 2019

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

Deborah McKinney Bureau of Land Management 620 E. Green St. Carlsbad, NM 88220

Re: COG Operating, LLC

Deferment Request

Burch Keely Unit Satellite G (11/12/18)

RP#: 2RP-5062

GPS: 32.80903, -104.01178

Unit Letter F, Section 30, Township 17 South, Range 30 East

Eddy County, New Mexico

Mr. Bratcher/Ms. McKinney,

COG Operating, LLC (COG) is pleased to submit the following deferment report in response to a release that occurred at the Burch Keely Unit Satellite G located in Unit Letter F, Section 30, Township 17 South and Range 30 East in Eddy County, New Mexico.

BACKGROUND

The release was discovered on November 12, 2018 and a C-141 initial report was submitted and approved by the New Mexico Oil Conservation Division (NMOCD). The initial C-141 is shown in Appendix A. The release occurred from a leaking fiberglass containment that captured leaking fluids from under the skid mount unit. The release was contained on location and a vacuum truck was used to remove all freestanding fluids. Approximately 2.5 barrels of oil and 2.5 barrels of produced water were released and recovered 0.5 barrels of oil and 0.5 barrels of produced water. The impacted area under the skid unit measured approximately 6.0' x 12.0'. A shallow scrape was performed under the skid unit but additional removal could not be performed due to access issues under the skid.

GROUNDWATER AND REGULATORY FRAMEWORK

According to the New Mexico Office of the State Engineer (NMOSE), reported a water well in Section 20 with groundwater depth of 80 feet below surface. The Chevron trend map show a depth to water >100 feet. The water well information is shown in Appendix B.

A risk based evaluation and site determinations were perform in accordance to the New Mexico Oil Conservation Division (NMOCD) Rule (Title 19 Chapter 15 Part 29) for releases on oil and gas development and production in New Mexico (effective August 14, 2018). According to the site characterization evaluation, no other receptors (water wells, playas, karst, water course, lake beds or ordinance boundaries) were located within each specific boundaries or distance from the site. The groundwater data and the site characterization evaluation data is summarized in Appendix B. The delineation and closure criteria are listed below:

General Site Characterization and Groundwater:

Site Characterization	Average Groundwater Depth (ft.)			
None Encountered	50-100 feet			

Delineation and Closure Criteria:

Remedial Actio	n Levels (RALs)
Chlorides	10,000 mg/kg
TPH (GRO and DRO and MRO)	2,500 mg/kg
TPH (GRO and DRO)	1,000 mg/kg
Benzene	10 mg/kg
Total BTEX	50 mg/kg

PROPOSED DEFERMENT

Referring to Table 1, the benzene, total BTEX and chloride concentrations are below the closure criteria or Remedial Action Levels (RAL). However, the TPH did exceed and showed a shallow impact to the soil, but declined below the RAL at 1-1.5' below the excavation bottom. The skid mount unit cannot be moved from the area to properly perform the remediation. The impacted area under the skid measured approximately 6.0' x 12.0'. Due to the access issues, COG propose to defer the remaining impact under the skid. To aid the hydrocarbon degradation, a Micro-Blaze product will be applied to the area.

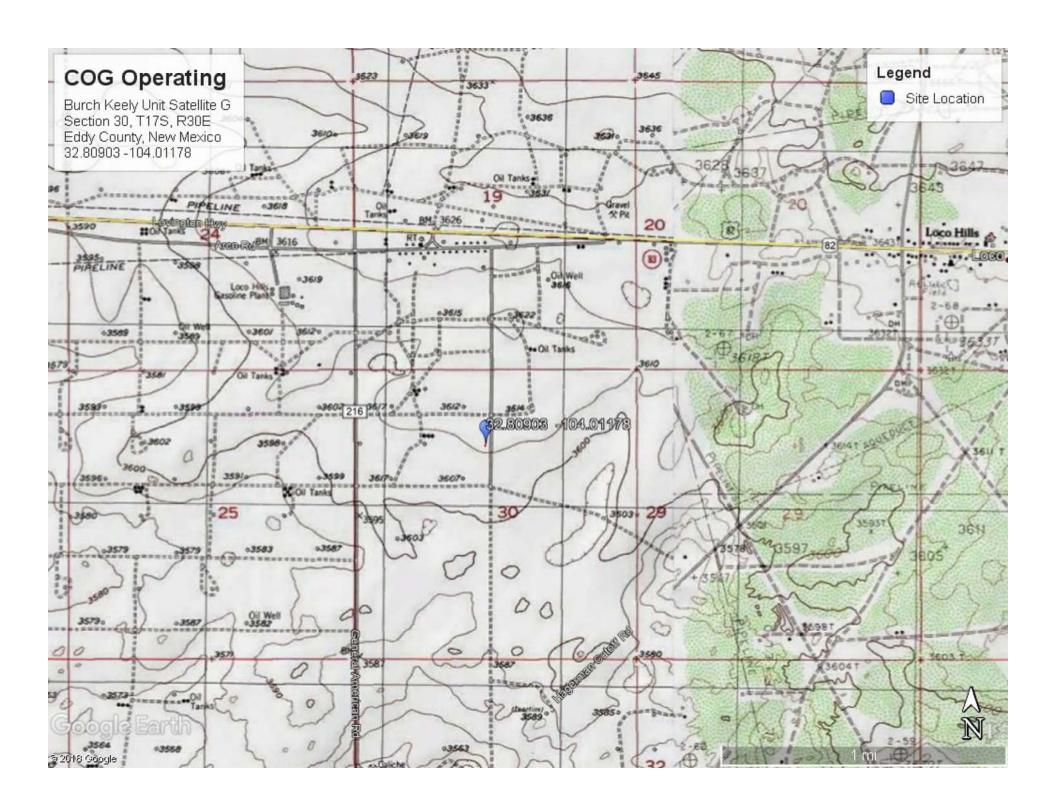
Should you have any questions or concerns on the proposed deferment, please do not hesitate to contact me.

Sincerely, Concho Operating, LLC

Ike Tavarez, P. G. Senior HSE Supervisor itavarez@concho.com

CC:

Figures







Tables

Table 1
COG Operating LLC.
Burch Keely Satellite G
Eddy County, New Mexico

OI- ID	OIn Data	Sounds ID Sounds Page Soil Status		TPH (mg/kg)					D	Total BTEX	011 11 (#)		
Sample ID Sample Dat	Sample Date	In-Situ	Removed	GRO	DRO	MRO	Total	GRO	DRO	Total	Benzene (mg/kg)	(mg/kg)	Chloride (mg/kg)
Average Depth to Grou	ındwater (ft)	>50 -100'											
NMOCD Remedial Act	tion Levels (mg/kg)			-	-	-	2,500	-	-	1,000	10	50	10,000
AH-1 0-1'	11/27/2018	X		62.4	3610	67.1	3740	62.4	3610	3,672.4	< 0.00200	0.0187	516
AH-1 1-1-5'	11/27/2018	X		<15.0	208	29.7	238	<15.0	208	208	< 0.00199	< 0.00199	469
AH-1 2-2.5'	11/27/2018	X		<15.0	940	83.5	1020	<15.0	940	904	< 0.00200	< 0.00200	403
AH-1 3-3.5'	11/27/2018	X		-	-	-	-	-	-	-	-	-	18.4
AH-1 4-4.5'	11/27/2018	X		-	-	-	-	-	-	-	-	-	623
AH-1 5-5.5'	11/27/2018	X		-	-	-	-	-	-	-	-	-	1260

Proposed Deferment

(-)

Not Analyzed

Appendix A

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

Responsible Party

State of New Mexico Energy Minerals and Natural Resources Department

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

OGRID

Contact Name					Contact Telephone		
Contact email					Incident # (assigned by OCD)		
Contact mailing address							
			Location	of R	elease So	ource	
Latitude Longitude (NAD 83 in decimal degrees to 5 decimal places)							
Site Name					Site Type		
Date Release	Discovered				API# (if app	licable)	
Unit Letter	Section	Township	Range		Coun	ty	
	Material		Nature and	d Vol	ume of F	justification for th	e volumes provided below)
Crude Oil		Volume Release				Volume Reco	
Produced	Water	Volume Release	` '			Volume Reco	
		Is the concentrate produced water >	ion of dissolved c >10.000 mg/l?	chloride	in the	Yes N	No
Condensa	ite	Volume Release				Volume Reco	overed (bbls)
Natural G	as	Volume Release	d (Mcf)			Volume Reco	overed (Mcf)
Other (describe) Volume/Weight Released (provide units)				Volume/Wei	ght Recovered (provide units)		
Cause of Rele	ease						

State of New Mexico Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major	If YES, for what reason(s) does the responsible	e party consider this a major release?
release as defined by 19.15.29.7(A) NMAC?		
, ,		
☐ Yes ☐ No		
If YES, was immediate no	otice given to the OCD? By whom? To whom	? When and by what means (phone, email, etc)?
	Initial Resp	onse
The responsible p	party must undertake the following actions immediately unl	ess they could create a safety hazard that would result in injury
☐ The source of the rele	ease has been stopped.	
☐ The impacted area has	s been secured to protect human health and the	environment.
Released materials ha	ave been contained via the use of berms or dikes	, absorbent pads, or other containment devices.
☐ All free liquids and re	ecoverable materials have been removed and ma	anaged appropriately.
If all the actions described	d above have <u>not</u> been undertaken, explain why	
		diation immediately after discovery of a release. If remediation
- 1		rts have been successfully completed or if the release occurred e attach all information needed for closure evaluation.
		of my knowledge and understand that pursuant to OCD rules and
regulations all operators are	required to report and/or file certain release notificat	ions and perform corrective actions for releases which may endanger
		does not relieve the operator of liability should their operations have groundwater, surface water, human health or the environment. In
addition, OCD acceptance of		onsibility for compliance with any other federal, state, or local laws
and/or regulations.		
_	1	itle:
_	Opeant	
Printed Name:	Opeant I	Date:
Printed Name:		
Printed Name: Signature: email:	T	Date:
Printed Name: Signature: email:	T	Date: elephone:

State of New Mexico Oil Conservation Division

Incident ID	
District RP	2RP 5062
Facility ID	
Application ID	

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	<u>50-100</u> (ft bgs)				
Did this release impact groundwater or surface water?					
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?					
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?					
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?					
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ⊠ No				
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ⊠ No				
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?					
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ⊠ No				
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ⊠ No				
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ⊠ No				
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ⊠ No				
Did the release impact areas not on an exploration, development, production, or storage site?	⊠ Yes □ No				
Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and ver contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.	tical extents of soil				
Characterization Report Checklist: Each of the following items must be included in the report.					
 Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells. Field data Data table of soil contaminant concentration data Depth to water determination Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release Boring or excavation logs Photographs including date and GIS information Topographic/Aerial maps Laboratory data including chain of custody 					

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

State of New Mexico Oil Conservation Division

Incident ID	
District RP	2RP 5062
Facility ID	
Application ID	

regulations all operators are required to report and/or file certain release no public health or the environment. The acceptance of a C-141 report by the failed to adequately investigate and remediate contamination that pose a the addition, OCD acceptance of a C-141 report does not relieve the operator of and/or regulations.	tifications and perform corrective actions for releases which may endanger OCD does not relieve the operator of liability should their operations have reat to groundwater, surface water, human health or the environment. In
Printed Name: <u>Ike Tavarez</u>	Title: Senior HSE Supervisor
Signature:	
email: <u>itavarez@concho.com</u>	Telephone: <u>432-683-7443</u>
OCD Only	
Received by:	Date:

State of New Mexico Oil Conservation Division

Incident ID	
District RP	2RP 5062
Facility ID	
Application ID	

Remediation Plan

Remediation Plan Checklist: Each of the following items must be	included in the plan.
☐ Detailed description of proposed remediation technique ☐ Scaled sitemap with GPS coordinates showing delineation points ☐ Estimated volume of material to be remediated ☐ Closure criteria is to Table 1 specifications subject to 19.15.29.12 ☐ Proposed schedule for remediation (note if remediation plan times)	2(C)(4) NMAC
<u>Deferral Requests Only</u> : Each of the following items must be conjugated	firmed as part of any request for deferral of remediation.
Contamination must be in areas immediately under or around prodeconstruction.	oduction equipment where remediation could cause a major facility
Extents of contamination must be fully delineated.	
☐ Contamination does not cause an imminent risk to human health,	the environment, or groundwater.
Signature:	ertain release notifications and perform corrective actions for releases ace of a C-141 report by the OCD does not relieve the operator of and remediate contamination that pose a threat to groundwater, cceptance of a C-141 report does not relieve the operator of aws and/or regulations. Example 2. Senior HSE Supervisor
OCD Only	
Received by:	Date:
☐ Approved ☐ Approved with Attached Conditions of A	Approval
Signature:	Date:

Appendix B



New Mexico Office of the State Engineer

Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

(R=POD has been replaced, O=orphaned, C=the file is

closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest) (NAD83 UTM in meters)

(In feet)

		POD											
		Sub-		QQ	Q							W	ater
POD Number	Code	basin	County	64 16	4	Sec	Tws	Rng	X	Y	DepthWellDepthV	Vater Co	lumn
RA 11914 POD1		RA	ED	2 4	2	20	17S	30E	594801	3632002	85	80	5

Average Depth to Water:

80 feet 80 feet

Minimum Depth:

Maximum Depth: 80 feet

Record Count: 1

PLSS Search:

Township: 17S Range: 30E

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

2/7/19 5:49 PM

WATER COLUMN/ AVERAGE DEPTH TO WATER



USGS Home Contact USGS Search USGS

National Water Information System: Web Interface

USGS Water Resources

Data Category:
Groundwater ✓ | Geographic Area:
United States ✓ | GO

Click to hideNews Bulletins

- Please see news on new formats
- Full News 🔊

Groundwater levels for the Nation

Search Results -- 1 sites found

site_no list =

• 324746104025001

Minimum number of levels = 1

Save file of selected sites to local disk for future upload

USGS 324746104025001 17S.29E.35.121443

Available data for this site Groundwater: Field measurements V GO

Eddy County, New Mexico

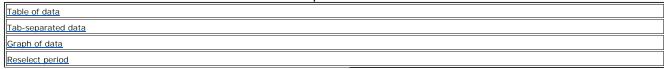
Hydrologic Unit Code --

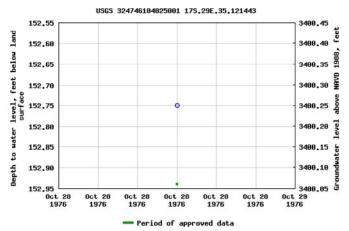
Latitude 32°47'46", Longitude 104°02'50" NAD27

Land-surface elevation 3,553 feet above NAVD88

This well is completed in the San Andres Limestone (313SADR) local aquifer.

Output formats





Breaks in the plot represent a gap of at least one year between field measurements. <u>Download a presentation-quality graph</u>

Questions about sites/data? Feedback on this web site Automated retrievals

<u>Help</u>

Data Tips

Explanation of terms

Subscribe for system changes

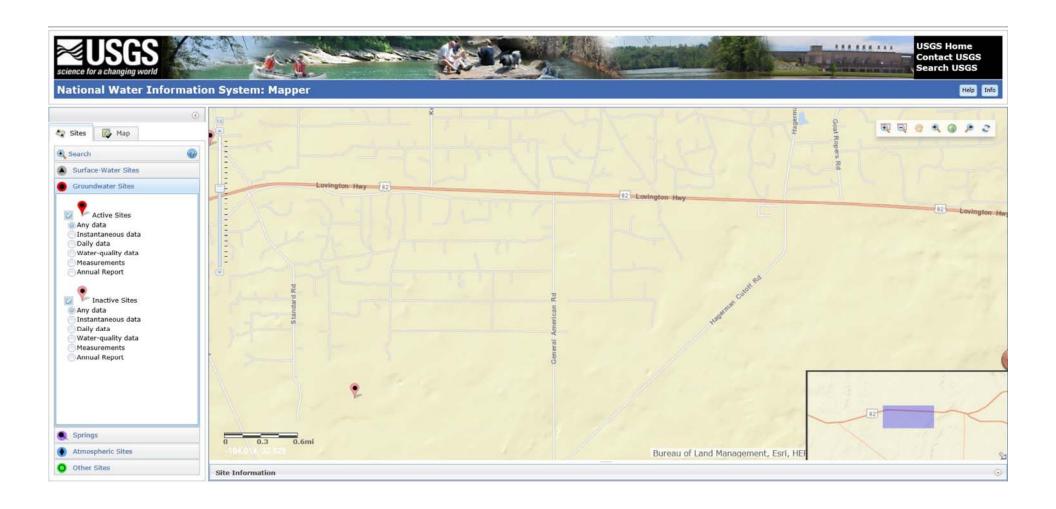
News

Accessibility Plug-Ins FOIA Privacy Policies and Notices

U.S. Department of the Interior | U.S. Geological Survey Title: Groundwater for USA: Water Levels

URL: https://nwis.waterdata.usgs.gov/nwis/gwlevels?

USA.gov



Burch Keely Satellite G

Section 30, T17S, R30E Eddy County, New Mexico 32.80903 -104.01178



216

General American Rd

82.80903, -104.01178

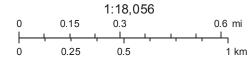




New Mexico NFHL Data



February 8, 2019



FEMA Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus

Appendix C



Ike Tavarez

Eddy Co. NM

Project Id:

Project Location:

Contact:

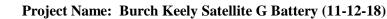
Total TPH

Certificate of Analysis Summary 607203

COG Operating LLC, Artesia, NM

Date Received in Lab: Mon Dec-03-18 11:53 am

Report Date: 06-DEC-18 Project Manager: Jessica Kramer



Lab Id: 607203-001 607203-002 607203-003 607203-004 607203-005 607203-006 Field Id: AH-1 0-1' AH-1 1-1-5' AH-1 2-2.5' AH-1 3-3.5' AH-1 4-4.5' AH-1 5-5.5' Analysis Requested Depth: Matrix: SOIL SOIL SOIL SOIL SOIL SOIL Nov-27-18 00:00 Nov-27-18 00:00 Sampled: Nov-27-18 00:00 Nov-27-18 00:00 Nov-27-18 00:00 Nov-27-18 00:00 BTEX by EPA 8021B Dec-05-18 10:30 Dec-05-18 10:30 Extracted: Dec-05-18 10:30 Analyzed: Dec-06-18 03:30 Dec-06-18 03:49 Dec-06-18 04:08 RL RL RL Units/RL: mg/kg mg/kg mg/kg < 0.00200 0.00200 < 0.00199 0.00199 < 0.00200 0.00200 Benzene Toluene 0.00390 0.00200 < 0.00199 0.00199 < 0.00200 0.00200 0.00362 0.00200 < 0.00199 0.00199 < 0.00200 0.00200 Ethylbenzene 0.00400 0.00398 0.00717 < 0.00398 < 0.00400 0.00400 m,p-Xylenes o-Xylene 0.00396 0.00200 < 0.00199 0.00199 < 0.00200 0.00200 0.0111 0.00200 < 0.00199 0.00199 < 0.00200 0.00200 Total Xylenes Total BTEX 0.0187 0.00200 < 0.00199 0.00199 < 0.00200 0.00200 Chloride by EPA 300 Extracted: Dec-03-18 17:00 Dec-03-18 17:00 Dec-03-18 17:00 Dec-03-18 17:00 Dec-03-18 17:00 Dec-03-18 17:00 Analyzed: Dec-04-18 04:24 Dec-04-18 04:30 Dec-04-18 04:36 Dec-04-18 05:01 Dec-04-18 05:07 Dec-04-18 08:29 Units/RL: mg/kg RL mg/kg RL mg/kg RL mg/kg RLmg/kg RL mg/kg RLChloride 516 5.00 469 4.95 403 5.00 18.4 4.96 623 4.96 1260 25.0 TPH By SW8015 Mod Extracted: Dec-03-18 14:00 Dec-03-18 14:00 Dec-03-18 14:00 Analyzed: Dec-04-18 07:38 Dec-04-18 07:57 Dec-04-18 08:16 Units/RL: mg/kg RL mg/kg RL mg/kg RL Gasoline Range Hydrocarbons 62.4 15.0 <15.0 15.0 <15.0 15.0 3610 15.0 15.0 Diesel Range Organics 15.0 208 940 Motor Oil Range Hydrocarbons (MRO) 15.0 29.7 83.5 15.0 67.1 15.0

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 - Midland - Tampa - Phoenix - Lubbock - San Antonio - El Paso - Atlanta - New Mexico

3740

15.0

Jessica Vramer

Jessica Kramer Project Assistant

238

15.0

1020

15.0

Analytical Report 607203

for COG Operating LLC

Project Manager: Ike Tavarez

Burch Keely Satellite G Battery (11-12-18)

06-DEC-18

Collected By: Client





1211 W. Florida Ave, Midland TX 79701

Xenco-Houston (EPA Lab Code: TX00122): Texas (T104704215-18-28), Arizona (AZ0765), Florida (E871002-24), Louisiana (03054) Oklahoma (2017-142)

> Xenco-Dallas (EPA Lab Code: TX01468): Texas (T104704295-18-17), Arizona (AZ0809), Arkansas (17-063-0)

Xenco-El Paso (EPA Lab Code: TX00127): Texas (T104704221-18-14)
Xenco-Lubbock (EPA Lab Code: TX00139): Texas (T104704219-18-18)
Xenco-Midland (EPA Lab Code: TX00158): Texas (T104704400-18-18)
Xenco-San Antonio (EPA Lab Code: TNI02385): Texas (T104704534-18-4)
Xenco Phoenix (EPA Lab Code: AZ00901): Arizona (AZ0757)
Xenco-Phoenix Mobile (EPA Lab Code: AZ00901): Arizona (AZM757)
Xenco-Atlanta (LELAP Lab ID #04176)

Xenco-Tampa: Florida (E87429) Xenco-Lakeland: Florida (E84098)





06-DEC-18

Project Manager: **Ike Tavarez COG Operating LLC**2407 Pecos Avenue

Artesia, NM 88210

Reference: XENCO Report No(s): 607203

Burch Keely Satellite G Battery (11-12-18)

Project Address: Eddy Co. NM

Ike Tavarez:

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) 607203. 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. 607203 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,

Jessica Kramer

Jessica Kramer

Project Assistant

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 607203



COG Operating LLC, Artesia, NM

Burch Keely Satellite G Battery (11-12-18)

Sample Id	Matrix	Date Collected	Sample Depth	Lab Sample Id
AH-1 0-1'	S	11-27-18 00:00		607203-001
AH-1 1-1-5'	S	11-27-18 00:00		607203-002
AH-1 2-2.5'	S	11-27-18 00:00		607203-003
AH-1 3-3.5'	S	11-27-18 00:00		607203-004
AH-1 4-4.5'	S	11-27-18 00:00		607203-005
AH-1 5-5.5'	S	11-27-18 00:00		607203-006

XENCO

CASE NARRATIVE

Client Name: COG Operating LLC

Project Name: Burch Keely Satellite G Battery (11-12-18)

Project ID: Report Date: 06-DEC-18 Work Order Number(s): 607203 Date Received: 12/03/2018

Sample receipt non conformances and comments:

None

Sample receipt non conformances and comments per sample:

None

Analytical non conformances and comments:

Batch: LBA-3071838 BTEX by EPA 8021B

Soil samples were not received in Terracore kits and therefore were prepared by method 5030.





Wet Weight

1

Basis:

mg/kg

12.04.18 04.24

COG Operating LLC, Artesia, NM

Burch Keely Satellite G Battery (11-12-18)

Sample Id: AH-1 0-1' Matrix: Soil Date Received:12.03.18 11.53

Lab Sample Id: 607203-001 Date Collected: 11.27.18 00.00

Analytical Method: Chloride by EPA 300 Prep Method: E300P

Tech: CHE % Moisture:

Analyst: CHE Date Prep: 12.03.18 17.00 Seq Number: 3071575

16887-00-6

Parameter Cas Number Result RL Units Analysis Date Flag Dil

5.00

Analytical Method: TPH By SW8015 Mod Prep Method: TX1005P

516

Tech: ARM % Moisture:

Analyst: ARM Date Prep: 12.03.18 14.00 Basis: Wet Weight

Seq Number: 3071595

Chloride

Parameter	Cas Number	Result	RL		Units	Analysis Date	Flag	Dil
Gasoline Range Hydrocarbons	PHC610	62.4	15.0		mg/kg	12.04.18 07.38		1
Diesel Range Organics	C10C28DRO	3610	15.0		mg/kg	12.04.18 07.38		1
Motor Oil Range Hydrocarbons (MRO)	PHCG2835	67.1	15.0		mg/kg	12.04.18 07.38		1
Total TPH	PHC635	3740	15.0		mg/kg	12.04.18 07.38		1
Surrogate		Cas Number	% Recovery	Units	Limits	Analysis Date	Flag	
1-Chlorooctane		111-85-3	95	%	70-135	12.04.18 07.38		
o-Terphenyl		84-15-1	110	%	70-135	12.04.18 07.38		





COG Operating LLC, Artesia, NM

Burch Keely Satellite G Battery (11-12-18)

Sample Id: AH-1 0-1' Matrix: Soil Date Received:12.03.18 11.53

Lab Sample Id: 607203-001 Date Collected: 11.27.18 00.00

Analytical Method: BTEX by EPA 8021B Prep Method: SW5030B

Tech: SCM % Moisture:

Analyst: SCM Date Prep: 12.05.18 10.30 Basis: Wet Weight

Parameter	Cas Number	Result	RL		Units	Analysis Date	Flag	Dil
Benzene	71-43-2	< 0.00200	0.00200		mg/kg	12.06.18 03.30	U	1
Toluene	108-88-3	0.00390	0.00200		mg/kg	12.06.18 03.30		1
Ethylbenzene	100-41-4	0.00362	0.00200		mg/kg	12.06.18 03.30		1
m,p-Xylenes	179601-23-1	0.00717	0.00400		mg/kg	12.06.18 03.30		1
o-Xylene	95-47-6	0.00396	0.00200		mg/kg	12.06.18 03.30		1
Total Xylenes	1330-20-7	0.0111	0.00200		mg/kg	12.06.18 03.30		1
Total BTEX		0.0187	0.00200		mg/kg	12.06.18 03.30		1
Surrogate		Cas Number	% Recovery	Units	Limits	Analysis Date	Flag	
1,4-Difluorobenzene		540-36-3	107	%	70-130	12.06.18 03.30		
4-Bromofluorobenzene		460-00-4	98	%	70-130	12.06.18 03.30		





COG Operating LLC, Artesia, NM

Burch Keely Satellite G Battery (11-12-18)

Sample Id: AH-1 1-1-5' Matrix: Soil Date Received:12.03.18 11.53

Lab Sample Id: 607203-002 Date Collected: 11.27.18 00.00

Analytical Method: Chloride by EPA 300 Prep Method: E300P

Tech: CHE % Moisture:

Analyst: CHE Date Prep: 12.03.18 17.00 Basis: Wet Weight

Seq Number: 3071575

 Parameter
 Cas Number
 Result
 RL
 Units
 Analysis Date
 Flag
 Dil

 Chloride
 16887-00-6
 469
 4.95
 mg/kg
 12.04.18 04.30
 1

Analytical Method: TPH By SW8015 Mod Prep Method: TX1005P

Tech: ARM % Moisture:

Analyst: ARM Date Prep: 12.03.18 14.00 Basis: Wet Weight

Parameter	Cas Number	Result	RL		Units	Analysis Date	Flag	Dil
Gasoline Range Hydrocarbons	PHC610	<15.0	15.0		mg/kg	12.04.18 07.57	U	1
Diesel Range Organics	C10C28DRO	208	15.0		mg/kg	12.04.18 07.57		1
Motor Oil Range Hydrocarbons (MRO)	PHCG2835	29.7	15.0		mg/kg	12.04.18 07.57		1
Total TPH	PHC635	238	15.0		mg/kg	12.04.18 07.57		1
Surrogate		Cas Number	% Recovery	Units	Limits	Analysis Date	Flag	
1-Chlorooctane		111-85-3	82	%	70-135	12.04.18 07.57		
o-Terphenyl		84-15-1	85	%	70-135	12.04.18 07.57		





COG Operating LLC, Artesia, NM

Burch Keely Satellite G Battery (11-12-18)

Sample Id: AH-1 1-1-5' Matrix: Soil Date Received:12.03.18 11.53

Lab Sample Id: 607203-002 Date Collected: 11.27.18 00.00

Analytical Method: BTEX by EPA 8021B Prep Method: SW5030B

Tech: SCM % Moisture:

Analyst: SCM Date Prep: 12.05.18 10.30 Basis: Wet Weight

Parameter	Cas Number	Result	RL		Units	Analysis Date	Flag	Dil
Benzene	71-43-2	< 0.00199	0.00199		mg/kg	12.06.18 03.49	U	1
Toluene	108-88-3	< 0.00199	0.00199		mg/kg	12.06.18 03.49	U	1
Ethylbenzene	100-41-4	< 0.00199	0.00199		mg/kg	12.06.18 03.49	U	1
m,p-Xylenes	179601-23-1	< 0.00398	0.00398		mg/kg	12.06.18 03.49	U	1
o-Xylene	95-47-6	< 0.00199	0.00199		mg/kg	12.06.18 03.49	U	1
Total Xylenes	1330-20-7	< 0.00199	0.00199		mg/kg	12.06.18 03.49	U	1
Total BTEX		< 0.00199	0.00199		mg/kg	12.06.18 03.49	U	1
Surrogate		Cas Number	% Recovery	Units	Limits	Analysis Date	Flag	
4-Bromofluorobenzene		460-00-4	96	%	70-130	12.06.18 03.49		
1,4-Difluorobenzene		540-36-3	114	%	70-130	12.06.18 03.49		





COG Operating LLC, Artesia, NM

Burch Keely Satellite G Battery (11-12-18)

Sample Id: AH-1 2-2.5' Matrix: Soil Date Received:12.03.18 11.53

Lab Sample Id: 607203-003 Date Collected: 11.27.18 00.00

Analytical Method: Chloride by EPA 300 Prep Method: E300P

Tech: CHE % Moisture:

Analyst: CHE Date Prep: 12.03.18 17.00

Basis: Wet Weight

% Moisture:

Seq Number: 3071575

 Parameter
 Cas Number
 Result
 RL
 Units
 Analysis Date
 Flag
 Dil

 Chloride
 16887-00-6
 403
 5.00
 mg/kg
 12.04.18 04.36
 1

Analytical Method: TPH By SW8015 Mod Prep Method: TX1005P

Tech: ARM

Analyst: ARM Date Prep: 12.03.18 14.00 Basis: Wet Weight

Parameter	Cas Number	Result	RL		Units	Analysis Date	Flag	Dil
Gasoline Range Hydrocarbons	PHC610	<15.0	15.0		mg/kg	12.04.18 08.16	U	1
Diesel Range Organics	C10C28DRO	940	15.0		mg/kg	12.04.18 08.16		1
Motor Oil Range Hydrocarbons (MRO)	PHCG2835	83.5	15.0		mg/kg	12.04.18 08.16		1
Total TPH	PHC635	1020	15.0		mg/kg	12.04.18 08.16		1
Surrogate		Cas Number	% Recovery	Units	Limits	Analysis Date	Flag	
1-Chlorooctane		111-85-3	88	%	70-135	12.04.18 08.16		
o-Terphenyl		84-15-1	92	%	70-135	12.04.18 08.16		





COG Operating LLC, Artesia, NM

Burch Keely Satellite G Battery (11-12-18)

Sample Id: AH-1 2-2.5' Matrix: Soil Date Received:12.03.18 11.53

Lab Sample Id: 607203-003 Date Collected: 11.27.18 00.00

Analytical Method: BTEX by EPA 8021B Prep Method: SW5030B

Tech: SCM % Moisture:

Analyst: SCM Date Prep: 12.05.18 10.30 Basis: Wet Weight

Parameter	Cas Number	Result	RL		Units	Analysis Date	Flag	Dil
Benzene	71-43-2	< 0.00200	0.00200		mg/kg	12.06.18 04.08	U	1
Toluene	108-88-3	< 0.00200	0.00200		mg/kg	12.06.18 04.08	U	1
Ethylbenzene	100-41-4	< 0.00200	0.00200		mg/kg	12.06.18 04.08	U	1
m,p-Xylenes	179601-23-1	< 0.00400	0.00400		mg/kg	12.06.18 04.08	U	1
o-Xylene	95-47-6	< 0.00200	0.00200		mg/kg	12.06.18 04.08	U	1
Total Xylenes	1330-20-7	< 0.00200	0.00200		mg/kg	12.06.18 04.08	U	1
Total BTEX		< 0.00200	0.00200		mg/kg	12.06.18 04.08	U	1
Surrogate		Cas Number	% Recovery	Units	Limits	Analysis Date	Flag	
1,4-Difluorobenzene		540-36-3	106	%	70-130	12.06.18 04.08		
4-Bromofluorobenzene		460-00-4	102	%	70-130	12.06.18 04.08		





COG Operating LLC, Artesia, NM

Burch Keely Satellite G Battery (11-12-18)

Sample Id: AH-1 3-3.5' Matrix: Soil Date Received:12.03.18 11.53

Lab Sample Id: 607203-004 Date Collected: 11.27.18 00.00

Analytical Method: Chloride by EPA 300 Prep Method: E300P

Tech: CHE % Moisture:

Analyst: CHE Date Prep: 12.03.18 17.00 Basis: Wet Weight

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	18.4	4.96	mg/kg	12.04.18 05.01		1





COG Operating LLC, Artesia, NM

Burch Keely Satellite G Battery (11-12-18)

Sample Id: AH-1 4-4.5' Matrix: Soil Date Received:12.03.18 11.53

Lab Sample Id: 607203-005 Date Collected: 11.27.18 00.00

Analytical Method: Chloride by EPA 300 Prep Method: E300P

Tech: CHE % Moisture:

Analyst: CHE Date Prep: 12.03.18 17.00 Basis: Wet Weight

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	623	4.96	mg/kg	12.04.18 05.07		1





COG Operating LLC, Artesia, NM

Burch Keely Satellite G Battery (11-12-18)

Sample Id: AH-1 5-5.5' Matrix: Soil Date Received:12.03.18 11.53

Lab Sample Id: 607203-006 Date Collected: 11.27.18 00.00

Analytical Method: Chloride by EPA 300 Prep Method: E300P

Tech: CHE % Moisture:

Analyst: CHE Date Prep: 12.03.18 17.00 Basis: Wet Weight

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	1260	25.0	mg/kg	12.04.18 08.29		5



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.

BRL Below Reporting Limit.

RL Reporting Limit

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

PQL Practical Quantitation Limit MQL Method Quantitation Limit LOQ Limit of Quantitation

DL Method Detection Limit

NC Non-Calculable

SMP Client Sample BLK Method Blank

BKS/LCS Blank Spike/Laboratory Control Sample BKSD/LCSD Blank Spike Duplicate/Laboratory Control Sample Duplicate

MD/SD Method Duplicate/Sample Duplicate MS Matrix Spike MSD: Matrix Spike Duplicate

- + NELAC certification not offered for this compound.
- * (Next to analyte name or method description) = Outside XENCO's scope of NELAC accreditation

^{**} Surrogate recovered outside laboratory control limit.



QC Summary 607203

COG Operating LLC

Burch Keely Satellite G Battery (11-12-18)

Analytical Method:	Chloride by EPA 300		Prep Method:	E300P
Seq Number:	3071575	Matrix: Solid	Date Prep:	12.03.18

MB Sample Id: 7667269-1-BLK LCS Sample Id: 7667269-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Lin	nit Units	Analysis Date	Flag
Chloride	< 5.00	250	274	110	269	108	90-110	2.	20	mo/ko	12.04.18 03:03	

Analytical Method: Chloride by EPA 300 Prep Method: E300P

 Seq Number:
 3071575
 Matrix:
 Soil
 Date Prep:
 12.03.18

 Parent Sample Id:
 606951-002
 MS Sample Id:
 606951-002 S
 MSD Sample Id:
 606951-002 SD

Spike MS MS %RPD RPD Limit Units Parent **MSD MSD** Limits Analysis Flag **Parameter** Result %Rec Date Result Amount Result %Rec Chloride 980 248 1250 109 1220 97 90-110 2 20 12.04.18 04:48 mg/kg

Analytical Method: Chloride by EPA 300 Prep Method: E300P

 Seq Number:
 3071575
 Matrix:
 Soil
 Date Prep:
 12.03.18

 Parent Sample Id:
 607264-007
 MS Sample Id:
 607264-007 S
 MSD Sample Id:
 607264-007 SD

MS %RPD RPD Limit Units Parent Spike MS **MSD MSD** Limits Analysis Flag **Parameter** Result %Rec Date Result Amount Result %Rec 12.04.18 03:22 Chloride 169 281 466 106 490 90-110 20 X 114 5 mg/kg

Analytical Method: TPH By SW8015 Mod Prep Method: TX1005P

Seq Number:3071595Matrix:SolidDate Prep:12.03.18MB Sample Id:7667325-1-BLKLCS Sample Id:7667325-1-BKSLCSD Sample Id:7667325-1-BSD

%RPD RPD Limit Units MB Spike LCS LCS LCSD LCSD Limits Analysis Flag **Parameter** Result %Rec Date Result Amount Result %Rec 12.03.18 15:39 853 85 879 70-135 3 20 Gasoline Range Hydrocarbons < 8.00 1000 88 mg/kg 12.03.18 15:39 70-135 2 20 Diesel Range Organics 1000 842 84 856 < 8.13 86 mg/kg

LCS LCS LCSD MB MB LCSD Limits Units Analysis **Surrogate** %Rec Flag %Rec Flag %Rec Flag Date 1-Chlorooctane 98 114 116 70-135 % 12.03.18 15:39 12.03.18 15:39 o-Terphenyl 105 93 95 70-135 %



QC Summary 607203

COG Operating LLC

Burch Keely Satellite G Battery (11-12-18)

Analytical Method:TPH By SW8015 ModPrep Method:TX1005PSeq Number:3071595Matrix: SoilDate Prep:12.03.18

Parent Sample Id: 607275-001 MS Sample Id: 607275-001 S

MSD Sample Id: 607275-001 SD

Flag

Spike MS MS Limits %RPD RPD Limit Units Parent **MSD MSD** Analysis Flag **Parameter** Result Amount Result Date %Rec %Rec Result 12.03.18 16:38 Gasoline Range Hydrocarbons 8.03 999 849 84 850 84 70-135 0 20 mg/kg 84 20 12.03.18 16:38 Diesel Range Organics 14.3 999 856 858 85 70-135 0 mg/kg

MS MS **MSD MSD** Limits Units Analysis **Surrogate** Flag %Rec %Rec Flag Date 1-Chlorooctane 97 101 70-135 % 12.03.18 16:38 o-Terphenyl 91 89 70-135 % 12.03.18 16:38

Analytical Method: BTEX by EPA 8021B Prep Method: SW5030B

Seq Number:3071838Matrix:SolidDate Prep:12.05.18MB Sample Id:7667476-1-BLKLCS Sample Id:7667476-1-BKSLCSD Sample Id:7667476-1-BSD

%RPD RPD Limit Units LCS LCS MB Spike Limits Analysis **LCSD** LCSD **Parameter** Date Result Amount Result %Rec Result %Rec < 0.000385 12.06.18 00:22 Benzene 0.100 0.0904 90 0.102 101 70-130 12 35 mg/kg Toluene < 0.000456 0.100 0.0957 0.109 108 70-130 13 35 12.06.18 00:22 96 mg/kg < 0.000565 12.06.18 00:22 105 70-130 13 35 Ethylbenzene 0.100 0.105 0.120 119 mg/kg 12.06.18 00:22 m,p-Xylenes < 0.00101 0.200 0.198 99 0.224 111 70-130 12 35 mg/kg < 0.000344 97 70-130 35 12.06.18 00:22 o-Xylene 0.100 0.0966 0.108 11 mg/kg

LCSD MB MB LCS LCS LCSD Limits Units Analysis **Surrogate** %Rec %Rec Flag Flag Flag Date %Rec 1.4-Difluorobenzene 111 95 94 70-130 % 12.06.18 00:22 12.06.18 00:22 4-Bromofluorobenzene 100 102 70-130 % 82

Analytical Method:BTEX by EPA 8021BPrep Method:SW5030BSeq Number:3071838Matrix:SoilDate Prep:12.05.18

 Seq Number:
 3071838
 Matrix:
 Soil
 Date Prep:
 12.05.18

 Parent Sample Id:
 606767-001
 MS Sample Id:
 606767-001 S
 MSD Sample Id:
 606767-001 SD

MS %RPD RPD Limit Units Parent Spike MS MSD MSD Limits Analysis Flag **Parameter** Result Amount Result %Rec %Rec Date Result < 0.000383 12.06.18 01:00 0.0994 Benzene 0.0644 65 0.0679 68 70-130 5 35 mg/kg X Toluene < 0.000453 0.0994 0.0690 69 0.0737 74 70-130 7 35 12.06.18 01:00 X mg/kg < 0.000561 12.06.18 01:00 Ethylbenzene 0.0994 0.0706 71 0.0761 76 70-130 7 35 mg/kg 12.06.18 01:00 0.00111 0.199 0.133 0.144 71 70-130 8 35 X m,p-Xylenes 66 mg/kg 12.06.18 01:00 0.0636 X o-Xylene 0.000360 0.0994 0.0696 69 70-130 35 mg/kg

MS MS **MSD MSD** Limits Units Analysis **Surrogate** %Rec Flag Flag Date %Rec 1,4-Difluorobenzene 98 96 70-130 % 12.06.18 01:00 4-Bromofluorobenzene 105 105 70-130 % 12.06.18 01:00

MS/MSD Percent Recovery Relative Percent Difference LCS/LCSD Recovery Log Difference
$$\begin{split} [D] &= 100*(\text{C-A}) \, / \, \text{B} \\ \text{RPD} &= 200* \mid (\text{C-E}) \, / \, (\text{C+E}) \mid \\ [D] &= 100*(\text{C}) \, / \, [\text{B}] \end{split}$$

Log Diff. = Log(Sample Duplicate) - Log(Original Sample)

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

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Final 1.000



XENCO Laboratories Prelogin/Nonconformance Report- Sample Log-In



Client: COG Operating LLC

Date/ Time Received: 12/03/2018 11:53:00 AM

Acceptable Temperature Range: 0 - 6 degC
Air and Metal samples Acceptable Range: Ambient

Work Order #: 607203

Temperature Measuring device used: R8

	Sample Receipt Checklist	Comments				
#1 *Temperature of cooler(s)?		.3				
#2 *Shipping container in good condition	Yes					
#3 *Samples received on ice?		Yes				
#4 *Custody Seals intact on shipping co	ontainer/ cooler?	N/A				
#5 Custody Seals intact on sample bott		N/A				
#6*Custody Seals Signed and dated?		N/A				
#7 *Chain of Custody present?		Yes				
#8 Any missing/extra samples?		No				
#9 Chain of Custody signed when relind	quished/ received?	Yes				
#10 Chain of Custody agrees with samp	ole labels/matrix?	Yes				
#11 Container label(s) legible and intac	t?	Yes				
#12 Samples in proper container/ bottle	?	Yes				
#13 Samples properly preserved?	Yes					
#14 Sample container(s) intact?	Yes					
#15 Sufficient sample amount for indica	Yes					
#16 All samples received within hold time	Yes					
#17 Subcontract of sample(s)?	N/A					
#18 Water VOC samples have zero hea	N/A					
* Must be completed for after-hours delivery of samples prior to placing in the refrigerator Analyst: PH Device/Lot#:						
Checklist completed by: Checklist reviewed by:	Bridge Tell Brianna Teel Jessica Warmer	Date: 12/03/2018 Date: 12/03/2018				