

**RECEIVED***By JKeyes at 10:28 am, Nov 10, 2015*Lupe Carrasco  
Environmental Coordinator**APPROVED***By JKeyes at 10:28 am, Nov 10, 2015*

October 23, 2015

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

**Re:   Burton 35 #1**  
      **30-025-40510**  
      **Sec. 35, T22S-R33E**  
      **Lea County, NM**

Ms. Jones,

COG Operating LLC would like to submit for your consideration the enclosed closure request for the above captioned well. The request is in response to the C-141 Initial report dated August 15, 2015.

### **Background**

The release was caused by a check valve failure resulting in the release of approximately 50 barrels of produced water with 48 barrels recovered. All fluid released was contained within the bermed facility.

### **Groundwater**

Based on the Chevron Trend Maps, the release area would be classified at a site ranking of Zero with depth to groundwater at greater than 400’.

### **Soil Assessment and Analytical Results**

Sampling points within the release area were chosen based on the point of release and safety in regards to buried lines and existing infrastructure. Approximate location of the sample points chosen are depicted on the attached site diagram as S1 and S2. The diagram also includes a sample summary table with the analytical results attached.

### **Work Plan**

COG Operating LLC proposes that no excavation be required within the berm facility based on the analytical results obtained and lack of any possible impact to ground water at depth to ground water greater than 400’. The bermed area will be addressed under COG’s normal housekeeping protocol.

#### **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

If there are no objections or further stipulations, COG Operating LLC requests closure of the above captioned location. Please feel free to contact me with any questions or concerns at (575) 748-6933.

Sincerely,



Lupe Carrasco  
Environmental Coordinator

Enclosure(s): Site Diagram  
Analytical Results  
C-141 Initial  
C-141 Final

**Sec. 35, T25S-R33E**

30-025-40510  
32 09241.-103.53668  
Released: 50 B/PW  
Recovered: 50 B/PW

S1	CI-
1'	1960
2'	400
S2	CI-
1'	ND

**Legend**

 Release Area



August 24, 2015

LUPE CARRASCO  
COG Operating, LLC  
500 W. ILLINOIS  
Midland, TX 79701

RE: BURTON 35 #1

Enclosed are the results of analyses for samples received by the laboratory on 08/19/15 14:19.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Celey D. Keene  
Lab Director/Quality Manager



**Analytical Results For:**

COG Operating, LLC  
LUPE CARRASCO  
500 W. ILLINOIS  
Midland TX, 79701  
Fax To: None

Received: 08/19/2015  
Reported: 08/24/2015  
Project Name: BURTON 35 #1  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 08/14/2015  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Judy Garcia

**Sample ID: S1-1' (H502164-01)**

Chloride, SM4500CI-B		mg/kg	Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1960	16.0	08/20/2015	ND	400	100	400	3.92	

**Sample ID: S1-2' (H502164-02)**

Chloride, SM4500CI-B		mg/kg	Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	400	16.0	08/20/2015	ND	400	100	400	3.92	

Cardinal Laboratories

\* = Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



Celey D. Keene, Lab Director/Quality Manager

**Notes and Definitions**

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

---

**Cardinal Laboratories****\*=Accredited Analyte**

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



---

Celey D. Keene, Lab Director/Quality Manager



101 East Marland, Hobbs, NM 88240  
(575) 393-2326 FAX (575) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: COG Operating LLC

Project Manager: Lupe Carrasco

Address: 2208 West Main

City: Artesia

Phone #: (575) 748-6940

Project #:

Project Name: Burton 35 #1

Project Location:

Sampler Name: Lupe Carrasco

BILL TO

P.O. #:

Company: COG Operating LLC

Attn: Robert McNeill

Address: 600 W Illinois

City: Midland

State: TX Zip: 79701

Phone #: (432) 221-0388

Fax #:

ANALYSIS REQUEST

FOR LAB USE ONLY	Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX	PRESERV	SAMPLING	DATE	TIME	BTEX	TPH	Chloride							
	H502164	S1-1'			GROUNDWATER			8/14/15				X							
		S1-2'			WASTEWATER			8/14/15				X							
		S1-3'			SOIL			8/14/15				X							
		S1-4'			OIL							X							
		S1-6'			SLUDGE							X							
					OTHER :														
					ACID/BASE:														
					ICE / COOL														
					OTHER :														

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Relinquished By:

Date:

Received By:

Relinquished By:

Date: 8/9/15

Received By: Judy Garcia

Delivered By: (Circle One)

Time: 14:19

Sample Condition

Good Impact

CHECKED BY: (Initials)

Sampler - UPS - Bus - Other:

FORM-006 R 2.0

440

Yes

Yes

† Cardinal cannot accept verbal changes. Please fax written changes to 575-393-2476

Phone Result: ☐ Yes ☐ No Add'l Phone #:

Fax Result: ☐ Yes ☐ No Add'l Fax #:

REMARKS: gcarasco@concho.com

atrulillo@concho.com

PLEASE RUN CHLORIDES UNTIL THEY FALL BELOW 1000 PPM

August 24, 2015

LUPE CARRASCO  
COG Operating, LLC  
500 W. ILLINOIS  
Midland, TX 79701

RE: BURTON 35 #1

Enclosed are the results of analyses for samples received by the laboratory on 08/19/15 14:19.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Celey D. Keene  
Lab Director/Quality Manager



**Analytical Results For:**COG Operating, LLC  
LUPE CARRASCO  
500 W. ILLINOIS  
Midland TX, 79701  
Fax To: NoneReceived: 08/19/2015  
Reported: 08/24/2015  
Project Name: BURTON 35 #1  
Project Number: NONE GIVEN  
Project Location: NOT GIVENSampling Date: 08/14/2015  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Judy Garcia**Sample ID: S2-1' (H502165-01)**

Chloride, SM4500Cl-B		mg/kg	Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	08/20/2015	ND	400	100	400	3.92	

Cardinal Laboratories

\* = Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



Celey D. Keene, Lab Director/Quality Manager

**Notes and Definitions**

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

---

**Cardinal Laboratories**\*=**Accredited Analyte**

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



---

**Celey D. Keene, Lab Director/Quality Manager**



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

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-141  
Revised August 8, 2011

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

**Release Notification and Corrective Action**

**OPERATOR**

☒ Initial Report ☐ Final Report

Name of Company: COG Operating LLC	Contact: Robert McNeill
Address: 600 West Illinois Avenue, Midland TX 79701	Telephone No. 432-230-0077
Facility Name: Burton 35 #1	Facility Type: Battery

Surface Owner: Fee	Mineral Owner:	API No. 30-025-40510
--------------------	----------------	----------------------

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
A	35	25S	33E	660'	North	660'	East	Eddy

Latitude 32.0924187 Longitude-103.5366821

**NATURE OF RELEASE**

Type of Release: Produced Water	Volume of Release: 50 bbls PW	Volume Recovered: 48 bbls PW
Source of Release: Tank Overflow	Date and Hour of Occurrence: 8/1/2015 10:00 am	Date and Hour of Discovery: 8/1/2015 10:00 am
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom? Lupe Carrasco	Date and Hour: Mon 8/3/2015 11:36 AM	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*


This release was caused by a tank overflow due to a check valve failure. Vacuum trucks were dispatched to recover all standing fluids.

Describe Area Affected and Cleanup Action Taken.\*

This release occurred within the bermed area of the facility. 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.

**OIL CONSERVATION DIVISION**

Signature: 	Approved by Environmental Specialist:		
Printed Name: Amanda Trujillo	Approval Date:		
Title: Senior Environmental Coordinator	Expiration Date:		Attached <input type="checkbox"/>
E-mail Address: <a href="mailto:atrujillo@concho.com">atrujillo@concho.com</a>	Conditions of Approval:		
Date: August 15, 2015 Phone: 575-748-6940			

\* Attach Additional Sheets If Necessary



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

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-141  
Revised August 8, 2011

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

**Release Notification and Corrective Action**

**OPERATOR**

☐ Initial Report ☒ Final Report

Name of Company: COG Operating LLC	Contact: Robert McNeill	
Address: 600 West Illinois Avenue, Midland TX 79701	Telephone No. 432-230-0077	
Facility Name: Burton 35 #1	Facility Type: Battery	
Surface Owner: Fee	Mineral Owner:	API No. 30-025-40510

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
A	35	25S	33E	660'	North	660'	East	Eddy

Latitude 32.0924187 Longitude-103.5366821

**NATURE OF RELEASE**

Type of Release: Produced Water	Volume of Release: 50 bbls PW	Volume Recovered: 48 bbls PW
Source of Release: Tank Overflow	Date and Hour of Occurrence: 8/1/2015 10:00 am	Date and Hour of Discovery: 8/1/2015 10:00 am
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom? Lupe Carrasco	Date and Hour: Mon 8/3/2015 11:36 AM	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*


Describe Cause of Problem and Remedial Action Taken.\*

This release was caused by a tank overflow due to a check valve failure. Vacuum trucks were dispatched to recover all standing fluids.

Describe Area Affected and Cleanup Action Taken.\*

This release occurred within the bermed area of the facility. Concho had the spill site sampled to delineate any possible contamination from the release and presented a closure request to the NMOCD for approval.

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: Lupe Carrasco	Approved by Environmental Specialist:	
Title: Environmental Coordinator	Approval Date:	Expiration Date:
E-mail Address: gcarrasco@concho.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: October 1, 2015 Phone: 575-748-6940		

\* Attach Additional Sheets If Necessary