

December 4, 2015

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

Re: Comanche 17 State #1

30-025-31385 Sec. 17, T21S-R33E Lea County, NM RECEIVED

By JKeyes at 10:07 am, Dec 16, 2015

APPROVED

By JKeyes at 10:07 am, Dec 16, 2015

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 February 12, 2015.

Background

The release was caused when the oil tank caught fire resulting in a total loss of the battery. It was estimated that 35 barrels of oil and 20 barrels of produced water were released with 8 barrels of produced water recovered. Once all risk assessments were complete, crews were dispatched to dismantle the battery and begin clean up. Crews excavated and hauled approximately 200 yards for disposal at a NMOCD approved facility. The hauled material came from the uppermost 4' of the impacted area. Additional material from the excavation was stockpiled on location while further delineation sampling was conducted. The total depth of excavation was 12' with approximately 400 yards of impacted soil stock piled on location (excavation from 4' to 12').

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 100'. The location is located at an elevation of approximately 3800' with the topography consistent with that of rolling hills.

Soil Assessment and Analytical Results

Initial sampling analysis indicated high BTEX concentrations. Final sampling for the impacted soil consisted of two representative samples from the stock piled material and

NMOCD December 4, 2015 Page 2

at a depth of 12.5' within the release area. Sample results show that BTEX and TPH are within RRAL's for a site ranking of Zero with chlorides levels being low in concentration. The attached site diagram contains a sample summary table with analytical results attached for your consideration.

Work Plan

COG Operating LLC has excavated the impacted area to a depth of approximately 12' with the uppermost 4' hauled for disposal. The stock piled material was sampled prior to disposal, sample results show that the stockpiled soil is suitable for placement within a site ranking of Zero. COG requests that stockpiled soil be used as backfill with additional soil brought in to bring the excavated area up to grade.

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

Sincerely,

Lupe Carrasco

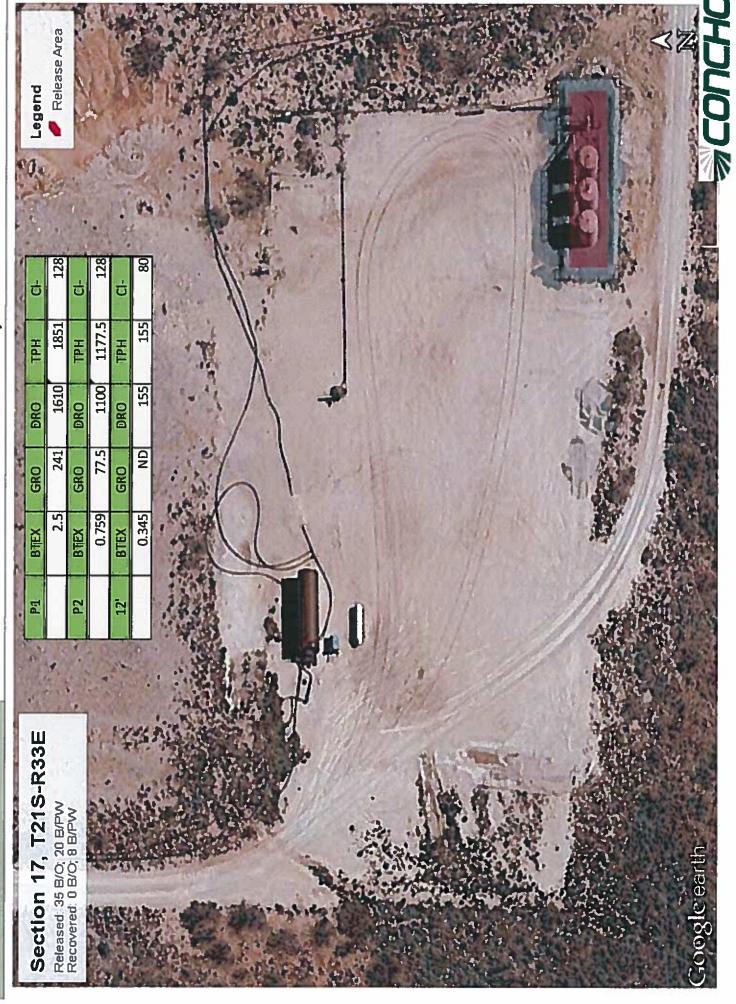
Environmental Coordinator

In Course

Enclosure(s): Site Diagram

Analytical Results C-141 Initial C-141 Final

Comanche 17 State #1





September 28, 2015

LUPE CARRASCO

COG OPERATING

P. O. BOX 1630

ARTESIA, NM 88210

RE: COMANCHE 17 STATE #1

Enclosed are the results of analyses for samples received by the laboratory on 09/02/15 14:00.

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/ga/lab accred certif,html.

Cardinal Laboratories is accreditated 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.

Celeg D. Keine

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 LUPE CARRASCO P. O. BOX 1630 ARTESIA NM, 88210 Fax To: NONE

Received:

09/02/2015

Reported:

09/28/2015

Project Name:

COMANCHE 17 STATE #1

Project Number:

NONE GIVEN

Project Location:

NOT GIVEN

Sampling Date:

ing Date:

08/27/2015

Sampling Type:

Soil

Sampling Condition: Sample Received By: Cool & Intact

Jodi Henson

Sample ID: P1 (H502339-01)

BTEX 8021B	mg/	kg	Analyze	d By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.100	0.100	09/04/2015	NĐ	1.96	98.1	2.00	0.983	
Toluene*	<0.100	0.100	09/04/2015	ND	1.79	89.3	2.00	1.10	
Ethylbenzene*	0.671	0.100	09/04/2015	ND	1.84	91.8	2.00	2.38	
Total Xylenes*	1.83	0.300	09/04/2015	ND	5.74	95.7	6.00	0.630	
Total BTEX	2.50	0.600	09/04/2015	ND					
Surrogate: 4-Bromofluorobenzene (PIL	107 %	6 85.6-13	7						
Chloride, SM4500CI-B	mg/	kg	Analyze	d By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	128	16.0	09/24/2015	ND	416	104	400	0.00	
TPH 8015M	mg/i	kg	Analyze	d By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	241	10.0	09/03/2015	ND	180	90.2	200	1.56	
DRO >C10-C28	1610	10.0	09/03/2015	ND	196	97.9	200	2.48	
Surrogate: 1-Chlorooctane	122 %	6 47.2-15	7						
Surrogate: 1-Chlorooctadecane	105 %	52:1-17	5						

Cardinal Laboratories

*=Accredited Analyte

PLEASE NOTE: Liability and Caminges. Cardinal's Bablishy and clients exclusive remaily for any claim ansung, whether based in combact or tors, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other clause whistorieve shall be deemed warved unless made in wrong and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be Sable for incidental or consequential damages, including, without function, which incidency, and or related to the performance of the services hereunder by Cardinal, regardless of whether such claims is based upon any of the above stated reasons or otherwise. Results related only to the samples identified above. This report shall not be reproduced except in full with vertices approval of Cardinal Liboratories.

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Analytical Results For:

COG OPERATING LUPE CARRASCO P. O. BOX 1630 ARTESIA NM, 88210 Fax To: NONE

Received:

09/02/2015

Reported:

09/28/2015

Project Name:

COMANCHE 17 STATE #1

Project Number:

NONE GIVEN

Project Location:

NOT GIVEN

Sampling Date:

08/27/2015

Sampling Type:

Soil

Sampling Condition: Sample Received By: Cool & Intact

Jodi Henson

Sample ID: P2 (H502339-02)

BTEX 8021B	mg/	kg	Analyze	d By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/04/2015	ND	1.96	98.1	2.00	0.983	
Toluene*	<0.050	0.050	09/04/2015	ND	1.79	89.3	2.00	1.10	
Ethylbenzene*	0.243	0.050	09/04/2015	ND	1.84	91.8	2.00	2.38	
Total Xylenes*	0.515	0.150	09/04/2015	ND	5.74	95.7	6.00	0.630	
Total BTEX	0.759	0.300	09/04/2015	ND					
Surrogate: 4-Bromofluorobenzene (PIE	102 9	6 85.6-13	7						
Chloride, SM4500CI-B	mg/	kg	Analyze	d By: HM		_			
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	128	16.0	09/24/2015	ND	416	104	400	0.00	
TPH 8015M	mg/	kg	Analyze	d By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	77.5	10.0	09/03/2015	ND	180	90.2	200	1.56	
DRO >C10-C28	1100	10.0	09/03/2015	ND	196	97.9	200	2.48	
Surrogate: 1-Chlorooctane	103 %	6 47.2-15	7			· 	Tg/		
Surrogate: 1-Chlorooctadecane	100 %	6 52.1-17	5						

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*=Accredited Analyte

PLEASE NOTE: Liabitey 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 whatoever shall be deemed visived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable terrice. In no event shall Cardinal be liable for incidental claimages, including, without filmication, business interruptions, loss of use, or fors of profits incirred by client, its subsidiance, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether auch 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 Liboratories.

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Analytical Results For:

COG OPERATING LUPE CARRASCO P. O. BOX 1630 ARTESIA NM, 88210 Fax To: NONE

Received:

09/02/2015

Reported:

09/28/2015

Project Name:

COMANCHE 17 STATE #1

Project Number:

NONE GIVEN

Project Location:

NOT GIVEN

Sampling Date:

08/27/2015

Sampling Type:

Soil

Sampling Condition: Sample Received By: Cool & Intact

Jodi Henson

Sample ID: 12' (H502339-03)

BTEX 8021B	mg,	/kg	Analyze	ed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifie
Benzene*	<0.050	0.050	09/04/2015	ND	1.96	98.1	2.00	0.983	
Toluene*	<0.050	0.050	09/04/2015	ND	1.79	89.3	2.00	1.10	
Ethylbenzene*	0.173	0.050	09/04/2015	ND	1.84	91.8	2.00	2.38	
Total Xylenes*	0.172	0.150	09/04/2015	ND	5.74	95.7	6.00	0.630	
Total BTEX	0.345	0.300	09/04/2015	ND					
Surrogate: 4-Bromofluorobenzene (PIE	92.1	% 85.6-13	7						
Chloride, SM4500CI-B	mg,	kg	Analyze	d By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	09/24/2015	ND	416	104	400	0.00	
TPH 8015M	mg/	kg	Analyze	d By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	09/03/2015	ND	180	90.2	200	1.56	
DRO >C10-C28	155	10.0	09/03/2015	ND	196	97.9	200	2.48	
Surrogate: 1-Chlorooctane	85.4	% 47.2-15							
Surrogate: 1-Chlorooctadecane	85 .7	% 52.1-17	6						

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*=Accredited Analyte

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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

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Colony & Keens

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST



(575) 393-2326 FAX (575) 393-2476

Company Name:	COG Operating LLC		BILL TO	100 mm	ANALYSIS REQUEST
Project Manager:	Lupe Carrasco		P.O. #:		
Address: 2208 W	2208 West Main		Company: COG Operating LLC	ПС	
City: Artesia	State: NM	Zip 88210	Attn: Robert McNeill		5
Phone #: (5	(575) 748-6940 Fax #:		Address: 600 W Illinois		/1:
Project #:	Project Owner:	ner:	City: Midland		2.3
Project Name: Con	Comanche 17 State #1		State: TX Zip: 79701		1/2
Project Location:			Phone #: (432) 221-0388		a
Sampler Name:	Lupe Carrasco		n *	_	1
- Constitution of the Cons	rape Corresco		Tax #:		0
FOR LAB USE ONLY			PRESERV. SAMPLING		de
Lab I.D. H502339	Sample I.D.	(G)RAB OR (C)OM # CONTAINERS GROUNDWATER WASTEWATER SOIL OIL	SLUDGE OTHER: ACID/BASE ICE / COOL OTHER: DATE	BTEX TPH	Chloride ada
<u> </u>			8/27/15	×	^
1 P2			8/27/15	×	7
5 12			8/27/15	×	
PLEASE ADTE: CENTY AND DOWN	The Cartally have and design and account.				
sence. In no event shall Cardhail	T-LIANCE AND IEC. LIABILITY BITS CHARGING CONTRACT BETAINING AND	or any class essing whether based in contra by dwared waved usless made in uning a drug without britishen, business biseruplanes	ct or livel, shall be literated in the amount juicd by the ci- ind received by Candinal within 30 days after complete r, less of use, or less of profits incurred by client, its up	tent for the ten of the applicable ubselsome.	
diffusion or successors wrang out o	ellimine or successors arrang out of or trained by the performance of services by Cardinal requesters of shortes been also during any of the above stated recurs or otherwise.	org water interes, burness theruptess by Cardral, reportions of whether such clar	i, less of use, or less of profits incurred by client, its su ry si bissed upon any of the above stated / seaams or o	dhachanes.	

Relinguished By. acce

Relinquished By

Sampler - UPS - Bus - Other: FORM-006 R 2.0

Sample Condition

Cool Intact

Tes Lifes

No I No

CHECKED BY:

Delivered By: (Circle One)

Time:

BCBIVED BY:

atrujillo@concho.com

Phone Result:

<u>District I</u> 1625 N. French Dr., Hobbs, NM 88240 <u>District II</u> 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**

Revised August 8, 2011 Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Form C-141

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

Release Notifica	ation	and Co	rrective A	ction				
		OPERA:	ГOR		Initia	ıl Report		Final Report
Name of Company: COG Operating LLC			bert McNeill					
Address: 600 West Illinois Avenue, Midland TX 79701 Facility Name: Comanche 17 State #1		Telephone If acility Typ	No. 432-230-007	17	-			
		active Typ	e. Dattery					
Surface Owner: State Mineral Ov	vner:			fl-	API No.	. 30-025-3	1385	
		OF REI	LEASE					
Unit Letter Section Township Range Feet from the G 17 21S 33E 1880		South Line North	Feet from the 1980		Vest Line East		Coun Lea	-
Latitude 32.4809442:	511583	Longitud	e -103.59250034	40734				
NATU	URE (OF RELI	EASE					
Type of Release:	-	Volume of	Release:		Volume R			
Oil and Produced Water Source of Release:			20 bbls PW our of Occurrence			8 bbls PW four of Disc		
Fire		1/28/2015	3:00 pm	.	1/28/2015	3:00 pm	covery	•
Was Immediate Notice Given? ☑ Yes ☐ No ☐ Not Req	uired	If YES, To Tomas Obc	Whom? erding – NMOCD					
By Whom? Amanda Trujillo		Date and H	our: 1/30/2015 5:	40 pm				
Was a Watercourse Reached?		If YES, Vo	lume Impacting th	ne Wate	rcourse.			
☐ Yes ☒ No								
If a Watercourse was Impacted, Describe Fully.*								
Describe Cause of Problem and Remedial Action Taken.*								
The allegate and the control of the								.
The oil tank caught fire and the rest of the battery burnt. This is a re were dispatched to recover standing fluid.	mote la	icility and no	tire crew respond	ded to ti	ie blaze. Up	on discover	гу vacı	ium trucks
·								
Describe Area Affected and Cleanup Action Taken.*								
The box of the Control of the Contro								
The battery was a total loss. Crews are working to dismantle the del from the release and we will present a remediation work plan to the	bris. Co NMOC	ncho will ha 'D for annro	ve the spill site sai val prior to any sid	mpled t	o delineate t remediatio	any possibl m work	e conta	mination
		tor appro	in prior to any sig	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	· Tomounum	m work.		
I hereby certify that the information given above is true and complete	ta ta the	host of my	manuladaa aad uu	.d	J 41-14		OCD.	1 1
regulations all operators are required to report and/or file certain rela	ease not	tifications an	d perform correct	ive acti	a mai pursi ons for relea	iant to Nivit ases which i	mav er	iles and idanger
public health or the environment. The acceptance of a C-141 report	by the	NMOCD ma	irked as "Final Re	port" de	oes not relie	ve the oper	ator of	liability
should their operations have failed to adequately investigate and ren or the environment. In addition, NMOCD acceptance of a C-141 re	nediate nort do	contamination	in that pose a three	at to gr ecnoneil	ound water,	Surface was	ler, hui ith anv	man health
federal, state, or local laws and/or regulations.	port do	es not reneve	the operator of the		Jinty Ioi co	пірпапсе з	nii any	Offici
1 - 21		OIL CONSERVATION DIVISION						
Signature:								
Printed Name: Amanda Trujillo	A	pproved by	Environmental Sp	ecialist	:			
Title: Senior Environmental Coordinator		pproval Date	h'		xpiration D	lata:		
The Sens Entrommental Continuo	 ^	рулочаі рак	<u>.</u>	<u> </u>	Apitation D	ate.		
E-mail Address: atrujillo@concho.com	c	onditions of	Approval:			Attached		
Date: February 12, 2015 Phone: 575-748-6940								

^{*} Attach Additional Sheets If Necessary

District 1
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

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

Form C-141

Revised August 8, 2011

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

1220 South St. Francis Dr.

			Rele	ase Notific	atio	n and Co	rrective A	ction	ì			
						OPERA?	ΓOR		Initia	l Report	\boxtimes	Final Report
Name of Co							bert McNeill					
Address: 60				d TX 79701			No. 432-230-007	77				
Facility Nar		iche 17 State	#1			Facility Typ	e: Battery					
Surface Ow	ner: State			Mineral O	wner:				API No	. 30- 025-3	1385	
				LOCA	OITA	N OF REI	LEASE					
Unit Letter G	Section 17	Township 21S	Range 33E	Feet from the 1880	North	n/South Line North	Feet from the 1980	l .	West Line East		Coun Lea	
			Latit	ude 32.480944	25115	83 Longitud	e -103.5925003	40734				
				NAT	URE	OF RELI						
Type of Relea	iced Water					Volume of 35 bbls Oil	Release: ; 20 bbls PW		ı	lecovered: ; 8 bbls PW	•	
Source of Re Fire	ease:					Date and H 1/28/2015	lour of Occurrence	e:	Date and 1/28/2015	Hour of Dis	covery.	•
Was Immedia	ite Notice C	iiven?				If YES, To			1/20/2013	3:00 pin		
			Yes	No 🗌 Not Re	equired		erding – NMOCD	ı				
By Whom?							lour: 1/30/2015 5:					
Was a Watero	ourse Reac	hed?	Yes 🛛	No		If YES, Vo	lume Impacting the	he Wate	ercourse.			
Describe Cause of Problem and Remedial Action Taken.* The oil tank caught fire and the rest of the battery burnt. This is a remote facility and no fire crew responded to the blaze. Upon discovery vacuum truch were dispatched to recover standing fluid.										um trucks		
Describe Area Affected and Cleanup Action Taken.* The battery was a total loss. Crews dismantled the debris. Concho had the spill site sampled to delineate any possible contamination from the release presented a closure request to the NMOCD for approval prior to any significant remediation work.									release and			
regulations al public health should their o	l operators a or the envir perations ha ment. In ac	are required to onment. The ave failed to a ddition, NMO	report an acceptanc dequately CD accep	d/or file certain ro e of a C-141 repo investigate and ro	elease r rt by th emediat	notifications ar ne NMOCD ma te contamination	knowledge and und perform correct arked as "Final Resont that pose a three the operator of r	tive acti eport" d eat to gr	ions for rele loes not reli ound water	ases which eve the oper , surface wa	may er rator of iter, hui	idanger `liability man health
g:						OIL CONSERVATION DIVISION						
Signature: Printed Name	: Lupe Car	rasco				Approved by	Environmental Sp	oecialist	:: Jami	Klyer ————————————————————————————————————		
Title: Enviror	mental Coc	ordinator				Approval Date	e: 12/16/2015		Expiration I	Date: ///		
E-mail Addre	ss: gcarrasc	o@concho.co	<u>m</u>		_	Conditions of	Approval:			Attached		
Date: Decem		ts If Necessa		e: 575-748-6940						1RP 3534		