

December 4, 2015

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

RECEIVED

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

**Re: Comanche 17 State #1
30-025-31385
Sec. 17, T21S-R33E
Lea County, NM**

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

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

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

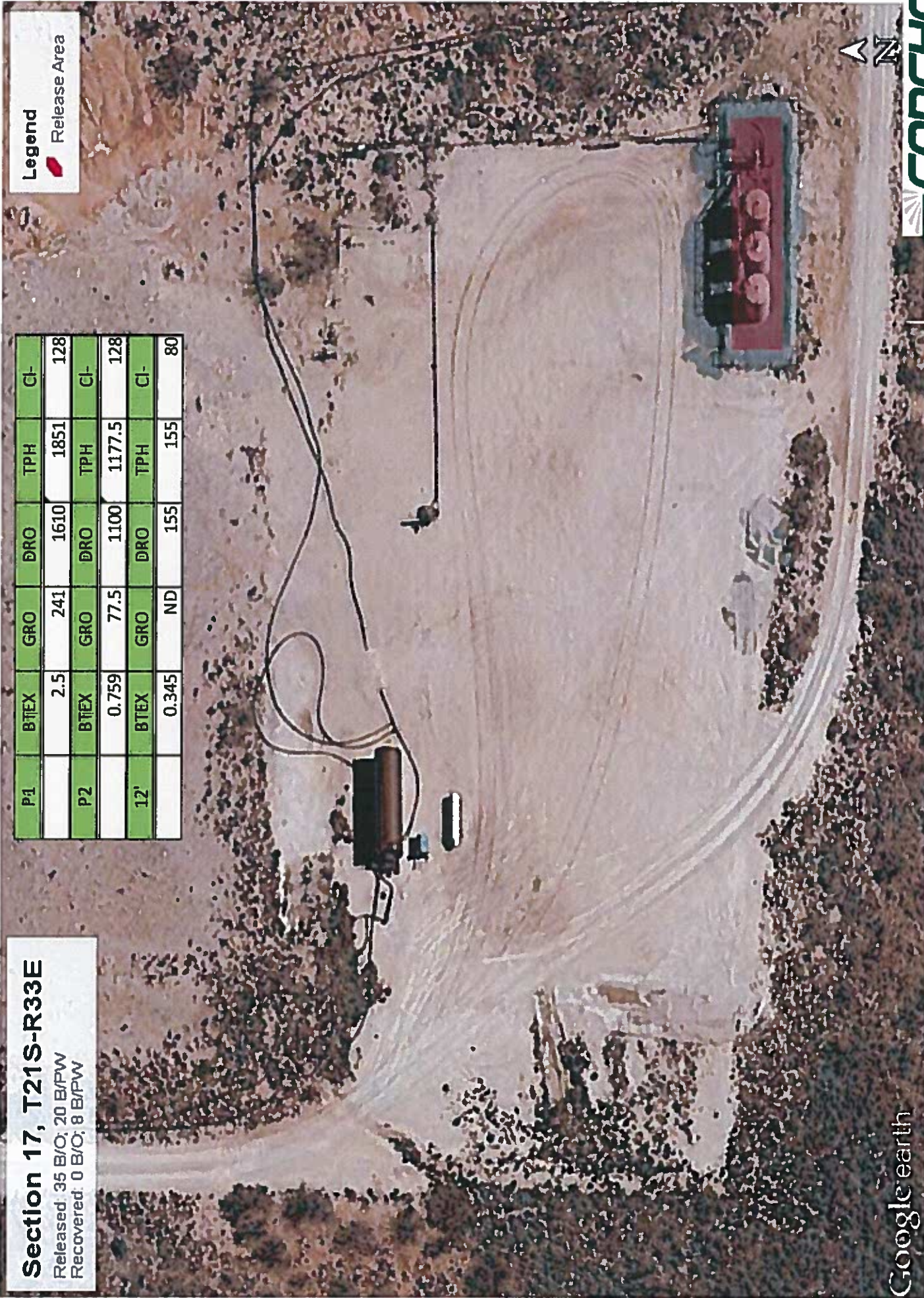
Comanche 17 State #1

Section 17, T21S-R33E

Released: 35 B/O; 20 B/PW
Recovered: 0 B/O; 8 B/PW

P1	BTEX	GRO	DRO	TPH	CI-
	2.5	241	1610	1851	128
P2	BTEX	GRO	DRO	TPH	CI-
	0.759	77.5	1100	1177.5	128
12'	BTEX	GRO	DRO	TPH	CI-
	0.345	ND	155	155	80

Legend
Release Area



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 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
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: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: P1 (H502339-01)

BTEX 8021B			mg/kg		Analyzed By: CK				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.100	0.100	09/04/2015	ND	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 (P1C) 107 % 85.6-137

Chloride, SM4500Cl-B			mg/kg		Analyzed 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		Analyzed 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 % 47.2-157

Surrogate 1-Chlorooctadecane 105 % 52.1-176

Cardinal Laboratories

*=Accredited Analyte

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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: 08/27/2015
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: P2 (H502339-02)

BTX 80218		mg/kg	Analyzed 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 BTX	0.759	0.300	09/04/2015	ND					

Surrogate: 4-Bromofluorobenzene (PIL) 102 % 85.6-137

Chloride, SM4500Cl-B		mg/kg	Analyzed 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	Analyzed 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 % 47.2-157

Surrogate: 1-Chlorooctadecane 100 % 52.1-176

Cardinal Laboratories

*=Accredited Analyte

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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: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: 12' (H502339-03)

BTEX 8021B		mg/kg	Analyzed 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*	0.173	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 % 85.6-137

Chloride, SM4500Cl-B		mg/kg	Analyzed 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	Analyzed 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 % 47.2-157

Surrogate: 1-Chlorooctadecane 85.7 % 52.1-176

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*=Accredited Analyte

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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

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Celey D. Keene, Lab Director/Quality Manager



Company Name: COG Operating LLC

P.O. #

COMPARISON

Attn:**Address**

City:

State: T

Phone:

Fax #:

PRE

#54

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: Comanche 17 State #1	Facility Type: Battery

Surface Owner: State	Mineral Owner:	API No. 30-025-31385
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LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
G	17	21S	33E	1880	North	1980	East	Lea

Latitude 32.4809442511583 Longitude -103.592500340734

NATURE OF RELEASE

Type of Release: Oil and Produced Water	Volume of Release: 35 bbls Oil; 20 bbls PW	Volume Recovered: 0 bbls Oil; 8 bbls PW
Source of Release: Fire	Date and Hour of Occurrence: 1/28/2015 3:00 pm	Date and Hour of Discovery: 1/28/2015 3:00 pm
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Tomas Oberding - NMOCD	
By Whom? Amanda Trujillo	Date and Hour: 1/30/2015 5:40 pm	
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 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 trucks were dispatched to recover standing fluid.

Describe Area Affected and Cleanup Action Taken.*

The battery was a total loss. Crews are working to dismantle the debris. 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:



Printed Name: Amanda Trujillo

Approved by Environmental Specialist:

Title: Senior Environmental Coordinator

Approval Date:

Expiration Date:

E-mail Address: atrujillo@concho.com

Conditions of Approval:

Attached ☐

Date: February 12, 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
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State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
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Form C-141
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Submit 1 Copy to appropriate District Office in
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Surface Owner: State	Mineral Owner:	API No. 30-025-31385
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Signature: 		OIL CONSERVATION DIVISION	
Printed Name: Lupe Carrasco		Approved by Environmental Specialist: 	
Title: Environmental Coordinator		Approval Date: 12/16/2015	Expiration Date: ///
E-mail Address: gcarrasco@concho.com		Conditions of Approval: ///	
Date: December 4, 2015 Phone: 575-748-6940		Attached <input type="checkbox"/> IRP 3534	

* Attach Additional Sheets If Necessary