

Closure Report

Site Description

Site Name:	Coonskin Fee 28C CTB
Company:	COG Operating LLC
Legal Description:	U/L C, Section 28, T24S, R25E
County:	Lea County, NM
GPS Coordinates:	N 32.19389° W-103.37478°

Release Data

Date of Release:	03/06/2018
Type of Release:	Oil
Source of Release:	Oil hauler
Volume of Release:	8 bbls
Volume Recovered:	0 bbls

Remediation Specifications

Remediation Parameters:	Excavated the entire leak area to a depth of 1 foot. Obtained confirmation sidewall samples and bottom sample. Backfilled the site with clean soil.	
Remediation Activities:	10/11/2018 to 10/12/2018	
Plan Sent to OCD:	03/24/2018	Email from Cliff Brunson to Olivia Yu
OCD Approval of Plan:	06/06/2018	Email from Olivia Yu to Cliff Brunson
Plan Sent to BLM:	n/a	n/a
BLM Approval of Plan:	n/a	n/a

Supporting Documentation

Initial C-141	Signed 03/07/2018
Final C-141	Signed 10/19/2018
Site Diagram	March 2018
Pictures	Initial visit-March 2018; Remediation-October 2018

Request for Closure

Based on the completion of the remediation plan, BBC International, Inc. requests closure approval from NMOCD.

Cliff Brunson, President, BBC International, Inc.

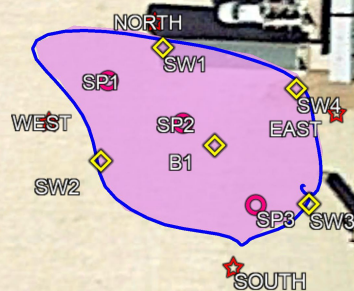
10/23/2018

COG, Coonskin Fee 28C CTB

Leak date: 03/06/2018
Lea County, NM
AP# 30-025-43683
1RP-4988

Legend

- 1 ft Excavation
- Cardinal sample points
- Confirmation sample points
- Sample points
- Leak Area



COG, Coonskin Fee 28C CTB

Sample points

SP1, N 32.19384 W-103.37472

SP2, N 32.19380 W-103.37465

SP3, N 32.19374 W-103.37458

NORTH, N 32.19389 W-103.37468

SOUTH, N 32.19369 W-103.37461

EAST, N 32.19381 W-103.37453

WEST, N 32.19380 W-103.37477

Confirmation sample points

SW1, N 32.19386 W-103.37467

SW2, N 32.19377 W-103.37472

SW3, N 32.19373 W-103.37455

SW4, N 32.19383 W-103.37456

BOTTOM 1, N 32.19378 W-103.37463

		Sample ID	SW1
Analyte	Method	Date	10/12/18
			mg/kg
Benzene	BTEX 8021B		<0.050
Toluene	BTEX 8021B		<0.050
Ethylbenzene	BTEX 8021B		<0.050
Total Xylenes	BTEX 8021B		<0.150
Total BTEX	BTEX 8021B		<0.300
Chloride	SM4500Cl-B		32
GRO	TPH 8015M		<10.0
DRO	TPH 8015M		<10.0
EXT DRO	TPH 8015M		<10.0

		Sample ID	SW4
Analyte	Method	Date	10/12/18
			mg/kg
Benzene	BTEX 8021B		<0.050
Toluene	BTEX 8021B		<0.050
Ethylbenzene	BTEX 8021B		<0.050
Total Xylenes	BTEX 8021B		<0.150
Total BTEX	BTEX 8021B		<0.300
Chloride	SM4500Cl-B		32
GRO	TPH 8015M		<10.0
DRO	TPH 8015M		<10.0
EXT DRO	TPH 8015M		<10.0

		Sample ID	SW2
Analyte	Method	Date	10/12/18
			mg/kg
Benzene	BTEX 8021B		<0.050
Toluene	BTEX 8021B		<0.050
Ethylbenzene	BTEX 8021B		<0.050
Total Xylenes	BTEX 8021B		<0.150
Total BTEX	BTEX 8021B		<0.300
Chloride	SM4500Cl-B		16
GRO	TPH 8015M		<10.0
DRO	TPH 8015M		<10.0
EXT DRO	TPH 8015M		<10.0

		Sample ID	BOTTOM @ 1'
Analyte	Method	Date	10/12/18
			mg/kg
Benzene	BTEX 8021B		<0.050
Toluene	BTEX 8021B		<0.050
Ethylbenzene	BTEX 8021B		<0.050
Total Xylenes	BTEX 8021B		<0.150
Total BTEX	BTEX 8021B		<0.300
Chloride	SM4500Cl-B		16
GRO	TPH 8015M		<10.0
DRO	TPH 8015M		<10.0
EXT DRO	TPH 8015M		<10.0

		Sample ID	SW3
Analyte	Method	Date	10/12/18
			mg/kg
Benzene	BTEX 8021B		<0.050
Toluene	BTEX 8021B		<0.050
Ethylbenzene	BTEX 8021B		<0.050
Total Xylenes	BTEX 8021B		<0.150
Total BTEX	BTEX 8021B		<0.300
Chloride	SM4500Cl-B		32
GRO	TPH 8015M		<10.0
DRO	TPH 8015M		<10.0
EXT DRO	TPH 8015M		<10.0



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

October 15, 2018

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: COONSKIN

Enclosed are the results of analyses for samples received by the laboratory on 10/12/18 14:40.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-18-11. 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.

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,

A handwritten signature in black ink, appearing to read "Mike Snyder", is written over a light gray rectangular background.

Mike Snyder For Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

BBC International, Inc.
 Cliff Brunson
 P.O. Box 805
 Hobbs NM, 88241
 Fax To: (575) 397-0397

Received:	10/12/2018	Sampling Date:	10/12/2018
Reported:	10/15/2018	Sampling Type:	Soil
Project Name:	COONSKIN	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	COG		

Sample ID: SW1 (H802940-01)

BTX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/15/2018	ND	2.22	111	2.00	2.25	
Toluene*	<0.050	0.050	10/15/2018	ND	2.19	110	2.00	2.07	
Ethylbenzene*	<0.050	0.050	10/15/2018	ND	2.22	111	2.00	1.53	
Total Xylenes*	<0.150	0.150	10/15/2018	ND	6.39	107	6.00	2.01	
Total BTX	<0.300	0.300	10/15/2018	ND					

Surrogate: 4-Bromofluorobenzene (PID) 107 % 69.8-142

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	10/15/2018	ND	416	104	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/13/2018	ND	210	105	200	1.34	
DRO >C10-C28*	<10.0	10.0	10/13/2018	ND	206	103	200	2.87	
EXT DRO >C28-C36	<10.0	10.0	10/13/2018	ND					

Surrogate: 1-Chlorooctane 94.3 % 41-142

Surrogate: 1-Chlorooctadecane 87.0 % 37.6-147

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*=Accredited Analyte

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

BBC International, Inc.
 Cliff Brunson
 P.O. Box 805
 Hobbs NM, 88241
 Fax To: (575) 397-0397

Received: 10/12/2018
 Reported: 10/15/2018
 Project Name: COONSKIN
 Project Number: NONE GIVEN
 Project Location: COG

Sampling Date: 10/12/2018
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: SW2 (H802940-02)

BTEx 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	10/15/2018	ND	2.22	111	2.00	2.25		
Toluene*	<0.050	0.050	10/15/2018	ND	2.19	110	2.00	2.07		
Ethylbenzene*	<0.050	0.050	10/15/2018	ND	2.22	111	2.00	1.53		
Total Xylenes*	<0.150	0.150	10/15/2018	ND	6.39	107	6.00	2.01		
Total BTEx	<0.300	0.300	10/15/2018	ND						

Surrogate: 4-Bromofluorobenzene (PID) 109 % 69.8-142

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	16.0	16.0	10/15/2018	ND	416	104	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/13/2018	ND	210	105	200	1.34	
DRO >C10-C28*	<10.0	10.0	10/13/2018	ND	206	103	200	2.87	
EXT DRO >C28-C36	<10.0	10.0	10/13/2018	ND					

Surrogate: 1-Chlorooctane 77.9 % 41-142

Surrogate: 1-Chlorooctadecane 71.1 % 37.6-147

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

BBC International, Inc.
 Cliff Brunson
 P.O. Box 805
 Hobbs NM, 88241
 Fax To: (575) 397-0397

Received: 10/12/2018
 Reported: 10/15/2018
 Project Name: COONSKIN
 Project Number: NONE GIVEN
 Project Location: COG

Sampling Date: 10/12/2018
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: SW3 (H802940-03)

BTEx 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/15/2018	ND	2.22	111	2.00	2.25	
Toluene*	<0.050	0.050	10/15/2018	ND	2.19	110	2.00	2.07	
Ethylbenzene*	<0.050	0.050	10/15/2018	ND	2.22	111	2.00	1.53	
Total Xylenes*	<0.150	0.150	10/15/2018	ND	6.39	107	6.00	2.01	
Total BTEx	<0.300	0.300	10/15/2018	ND					

Surrogate: 4-Bromofluorobenzene (PID) 111 % 69.8-142

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	10/15/2018	ND	416	104	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/13/2018	ND	210	105	200	1.34	
DRO >C10-C28*	<10.0	10.0	10/13/2018	ND	206	103	200	2.87	
EXT DRO >C28-C36	<10.0	10.0	10/13/2018	ND					

Surrogate: 1-Chlorooctane 80.6 % 41-142

Surrogate: 1-Chlorooctadecane 77.7 % 37.6-147

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

BBC International, Inc.
 Cliff Brunson
 P.O. Box 805
 Hobbs NM, 88241
 Fax To: (575) 397-0397

Received: 10/12/2018
 Reported: 10/15/2018
 Project Name: COONSKIN
 Project Number: NONE GIVEN
 Project Location: COG

Sampling Date: 10/12/2018
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: SW4 (H802940-04)

BTEx 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	10/15/2018	ND	2.22	111	2.00	2.25		
Toluene*	<0.050	0.050	10/15/2018	ND	2.19	110	2.00	2.07		
Ethylbenzene*	<0.050	0.050	10/15/2018	ND	2.22	111	2.00	1.53		
Total Xylenes*	<0.150	0.150	10/15/2018	ND	6.39	107	6.00	2.01		
Total BTEx	<0.300	0.300	10/15/2018	ND						

Surrogate: 4-Bromofluorobenzene (PID) 111 % 69.8-142

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	10/15/2018	ND	416	104	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/13/2018	ND	210	105	200	1.34	
DRO >C10-C28*	<10.0	10.0	10/13/2018	ND	206	103	200	2.87	
EXT DRO >C28-C36	<10.0	10.0	10/13/2018	ND					

Surrogate: 1-Chlorooctane 99.2 % 41-142

Surrogate: 1-Chlorooctadecane 94.2 % 37.6-147

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

BBC International, Inc.
 Cliff Brunson
 P.O. Box 805
 Hobbs NM, 88241
 Fax To: (575) 397-0397

Received: 10/12/2018
 Reported: 10/15/2018
 Project Name: COONSKIN
 Project Number: NONE GIVEN
 Project Location: COG

Sampling Date: 10/12/2018
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: BOTTOM @ 1' (H802940-05)

BTEx 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	10/15/2018	ND	2.22	111	2.00	2.25		
Toluene*	<0.050	0.050	10/15/2018	ND	2.19	110	2.00	2.07		
Ethylbenzene*	<0.050	0.050	10/15/2018	ND	2.22	111	2.00	1.53		
Total Xylenes*	<0.150	0.150	10/15/2018	ND	6.39	107	6.00	2.01		
Total BTEx	<0.300	0.300	10/15/2018	ND						

Surrogate: 4-Bromofluorobenzene (PID) 110 % 69.8-142

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	10/15/2018	ND	416	104	400	3.77	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/13/2018	ND	210	105	200	1.34	
DRO >C10-C28*	<10.0	10.0	10/13/2018	ND	206	103	200	2.87	
EXT DRO >C28-C36	<10.0	10.0	10/13/2018	ND					

Surrogate: 1-Chlorooctane 93.5 % 41-142

Surrogate: 1-Chlorooctadecane 87.1 % 37.6-147

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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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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A handwritten signature in black ink, appearing to read "Mike Snyder", is written over a horizontal line.

Mike Snyder For Celey D. Keene, Lab Director/Quality Manager

Page 8 of 8



ORDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240
(505) 393-2326 FAX (505) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: BBC International, Inc. Project Manager: Cliff Brunson Address: P.O. Box 805 City: Hobbs State: NM Zip: 88241 Phone #: 575-397-6388 Fax #: 575-397-0397 Project #: Project Owner: COG Project Name: Conservation Project Location: Sample Name: Site Brunson FOR LAB USE ONLY										BILL TO P.O. #: Company: Attn: Address: City: State: Zip: Phone #: Fax #:										ANALYSIS REQUEST																			
Lab I.D. A1802940 Sample I.D.										(G)RAB OR (C)OMP. # CONTAINERS GROUNDWATER WASTEWATER SOIL OIL SLUDGE OTHER : ACID/BASE: ICE / COOL OTHER :										MATRIX PRESERV SAMPLING																			
1 SW 1 2 SW 2 3 SW 3 4 SW 4 5 Bottom @ 1'										DATE 10/12/18 10/12/18 10/12/18 10/12/18 10/12/18										TIME 1010 1020 1030 1040 1050										CL- TPA EXT BTX									
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 subcontractors 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: 10/12/18 Time: 10PM Received By: Date: 10-12-18 Time: 10:40 Received By: Date: 10-12-18 Time: 10:40										Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Phone #: Add'l Fax #:										REMARKS: Rush!																			

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State of New Mexico
Oil Conservation Division

Incident ID	
District RP	1RP-4465
Facility ID	
Application ID	

Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

Closure Report Attachment Checklist: *Each of the following items must be included in the closure report.*

- ☒ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☒ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☒ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☒ Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Rebecca Haskell Title: Senior HSE Coordinator
 Signature: *Rebecca Haskell* Date: 10/19/18
 email: rhaskell@concho.com Telephone: (432) 683-7443

OCD Only

Received by: _____ Date: _____

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: *Brittany Hall* Date: 11/17/2022
 Printed Name: Brittany Hall Title: Environmental Specialist

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS

Action 159724

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 159724
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

Created By	Condition	Condition Date
bhall	None	11/17/2022