



February 15, 2022

Bradford Billings  
Hydrologist/E.Spec.A  
District 2 Artesia  
1220 South St. Francis Drive  
Oil Conservation Division  
Santa Fe, NM 87505

**Re: Release Characterization and Closure Request  
ConocoPhillips  
Heritage Concho  
Moody 18 State Com #001H Release  
Unit Letter D, Section 15, Township 25 South, Range 28 East  
Eddy County, New Mexico  
Incident ID# NJMW1308640545  
2RP-1591**

Mr. Billings,

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips to assess a Heritage Concho release and subsequent remedial actions taken at the Moody 18 State Com #001H release site (API No. 30-015-39585). The release footprint is located in Public Land Survey System (PLSS) Unit Letter D, Section 15, Township 25 South, Range 28 East, in Eddy County, New Mexico (Site). The approximate release point occurred at coordinates 32.136102°, -104.134456°, as shown on Figures 1 and 2.

## BACKGROUND

According to the State of New Mexico Oil Conservation Division (NMOCD) C-141 Initial Report, the release was discovered on March 2, 2013. The C-141 reports that the cause of the release was caused by a storage tank overflowing at the Moody 18 State Com #001H lease pad. Approximately 20 barrels (bbls) of oil were released and approximately 10 bbls of oil were recovered. The NMOCD approved the initial C-141 on March 12, 2013 and subsequently assigned the release the Incident ID nJMW1308640545 and the remediation permit (RP) number 2RP-1591. The initial C-141 form is included in Appendix A.

## SITE CHARACTERIZATION

A site characterization was performed and no sinkholes, residences, schools, hospitals, institutions, churches, springs, private domestic water wells, playa lakes, stream bodies, wetlands, incorporated municipal boundaries, subsurface mines, or floodplains are located within the distances specified in 19.15.29 New Mexico Administrative Code (NMAC). The Site is in an area of medium karst potential.

There are no water wells listed in the New Mexico Office of the State Engineer (NMOSE) database located within approximately ½ mile (800 meters) of the site. According to data from one (1) water well listed in the NMOSE database within approximately 0.75 miles (1,200 meters) of the site, the minimum depth to groundwater is 63 feet below ground surface (bgs). The site characterization data are presented in Appendix B.

Tetra Tech

901 West Wall St., Suite 100, Midland, TX 79701

Tel 432.682.4559 Fax 432.682.3946 www.tetrattech.com

## REGULATORY FRAMEWORK

Based upon the release footprint and in accordance with Subsection E of 19.15.29.12 NMAC, per 19.15.29.11 NMAC, the site characterization data was used to determine recommended remedial action levels (RRALs) for benzene, toluene, ethylbenzene, and xylene (collectively referred to as BTEX), total petroleum hydrocarbons (TPH), and chlorides in soil.

Based on the site characterization, established depth to groundwater, and in accordance with Table I of 19.15.29.12 NMAC, the RRALs for the Site are as follows:

Constituent	Reclamation Requirements
Chloride	600 mg/kg
TPH	100 mg/kg
BTEX	50 mg/kg
Benzene	10 mg/kg

## INITIAL RESPONSE ACTIVITIES AND INITIAL ASSESSMENT

Following the release, Concho dispatched vacuum trucks to recover standing fluid. A release extent was not provided by Concho, but according to the initial C-141 the release remained within the boundary of the lease pad. The approximate release point is presented in Figure 3. The frac tanks at the facility associated with the release have since been decommissioned, as seen in Figure 4. Although no documentation of remedial actions was provided by Concho, such actions were presumably taken at the time of the tank decommissioning.

On March 26, 2019, following the removal of the frac tanks, Concho was onsite to install two (2) hand auger borings (AH-1 and AH-2) at the former release location to total depths of 2 feet bgs to assess the release. The sampling locations are presented in Figure 4. A total of four (4) soil samples were collected from two (2) borings and sent to Xenco Laboratories in Midland, Texas to be analyzed for chlorides via EPA method 300, TPH via EPA Method 8015M and BTEX via EPA Method 8021B. A copy of the laboratory analytical report and chain-of-custody documentation are included in Appendix C.

Analytical results associated with samples collected during the March 2019 assessment activities are summarized in Table 1. All analytical results were below applicable Site RRALs and reclamation requirements for the Site.

## SITE RECLAMATION AND RESTORATION PLAN

Tetra Tech conducted a visual inspection at the Site on September 21, 2021 to assess current site conditions. No evidence of surface staining or the release was observed during the visual inspection. Photographic documentation from the visual inspection is presented in Appendix D.

Based on the site characterization, the impacted surface area of the release on the production lease pad meets the remediation standards of Table I of 19.15.29.12 NMAC. As these areas are needed for production operations, final reclamation of any impact within the lease pad areas shall take place in accordance with 19.15.29.12 and 19.15.29.13 NMAC once the Site is no longer being used for oil and gas operations. Therefore, reclamation of the soils located within the confines of the Moody 18 State #001H lease pad will be delayed until the abandonment of the facility and the full pad reclamation.

## CONCLUSION

Based on the results of the site assessment, ConocoPhillips considers the current release footprint to be fully delineated. All analytical results associated with the on-pad site assessment were below applicable

Release Characterization and Closure Request  
February 15, 2022

ConocoPhillips

Site RRALs following the initial response actions; therefore, no further remediation of the release footprint is necessary.

Based on the above, ConocoPhillips respectfully requests closure for this release. Final reclamation shall take place in accordance with 19.15.29.13 NMAC once the site is no longer being used for oil and gas operations. The final C-141 forms are enclosed in Appendix A. If you have any questions concerning the soil assessment activities for the Site, please call me at (512) 217-7254 or Christian at (512) 338-2861.

Sincerely,  
**Tetra Tech, Inc.**



Samantha K. Abbott, P.G.  
Senior Staff Geologist



Christian M. Llull, P.G.  
Project Manager

cc:  
Mr. Charles Beauvais, BU – ConocoPhillips

## LIST OF ATTACHMENTS

### Figures:

- Figure 1 – Overview Map
- Figure 2 – Topographic Map
- Figure 3 – Approximate Release Location Map
- Figure 4 – Site Assessment Map

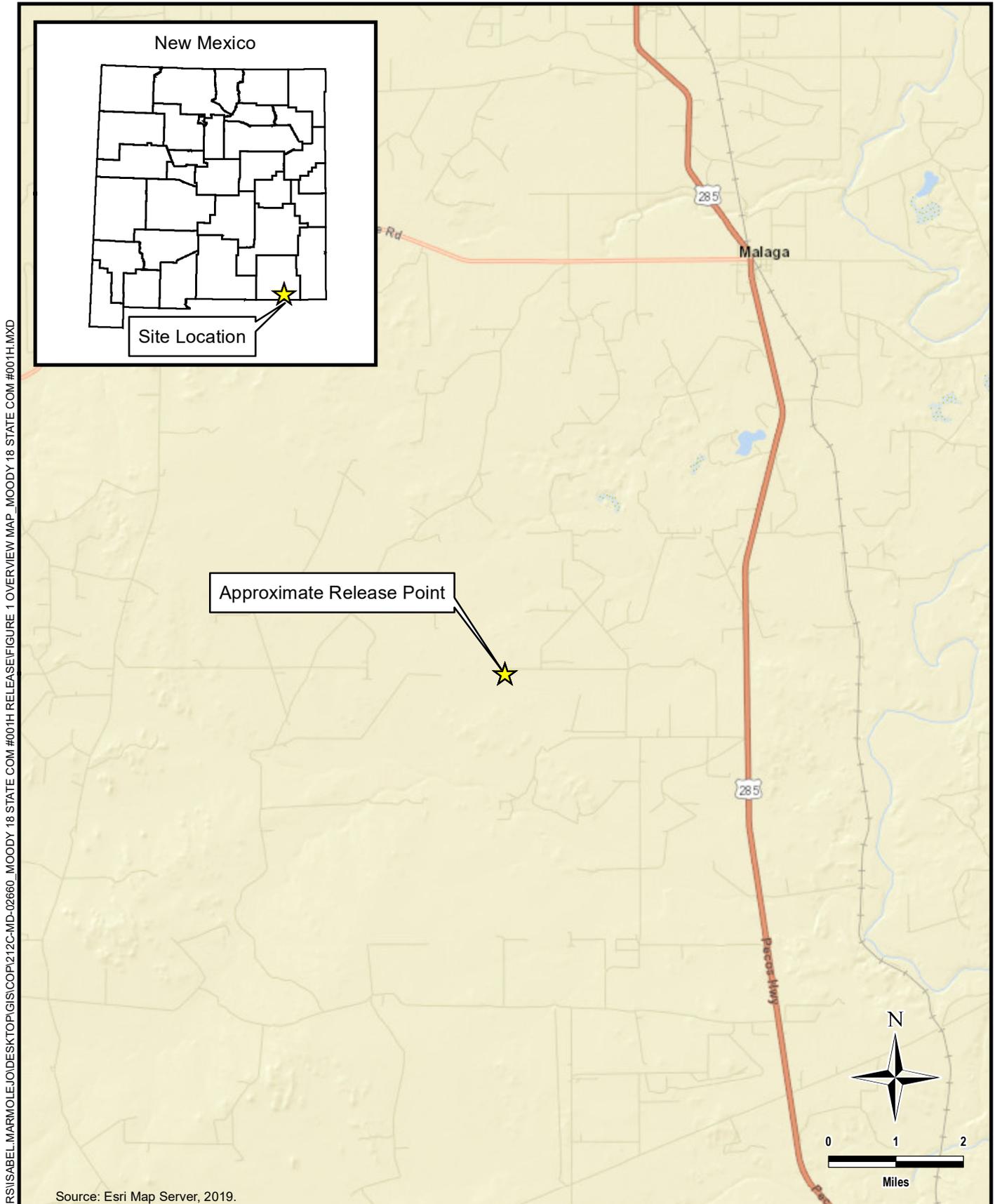
### Tables:

- Table 1 – Summary of Analytical Results

### Appendices:

- Appendix A – C-141 Forms
- Appendix B – Site Characterization Data
- Appendix C – Laboratory Analytical Data
- Appendix D – Photographic Documentation

# **FIGURES**



DOCUMENT PATH: C:\USERS\ISABEL.MARMOLEJO\DESKTOP\GIS\COPY\212C-MD-02660\_MOODY 18 STATE COM #001H RELEASE\FIGURE 1 OVERVIEW MAP\_MOODY 18 STATE COM #001H.MXD

Source: Esri Map Server, 2019.



**TETRA TECH**

www.tetrattech.com

901 West Wall Street, Suite 100  
Midland, Texas 79701  
Phone: (432) 682-4559  
Fax: (432) 682-3946

**CONOCOPHILLIPS**

NJMW1308640545  
(32.136102°, -104.134456°)  
EDDY COUNTY, NEW MEXICO

**MOODY 18 STATE COM #001H RELEASE  
OVERVIEW MAP**

PROJECT NO.: 212C-MD-02660

DATE: FEBRUARY 02, 2022

DESIGNED BY: IM

Figure No.

**1**



DOCUMENT PATH: C:\USERS\ISABEL.MARMOLEJO\DESKTOP\GIS\CONOCO PHILIPS\212C-MD-02660\_MOODY 18 STATE COM #001H RELEASE\FIGURE 3 APPROXIMATE RELEASE LOCATION MAP\_MOODY 18 STATE COM #001H.MXD



**Legend**

-  Approximate Release Point
-  Approximate Location of Former Frac Tanks

Source: Google Earth Historical Imagery, 01/22/2013.

 <b>TETRA TECH</b> <a href="http://www.tetrattech.com">www.tetrattech.com</a> 901 West Wall Street, Suite 100 Midland, Texas 79701 Phone: (432) 682-4559 Fax: (432) 682-3946	<b>CONOCOPHILLIPS</b> NJMW1308640545 (32.136102°, -104.134456°) EDDY COUNTY, NEW MEXICO	PROJECT NO.: 212C-MD-02660 DATE: FEBRUARY 08, 2022 DESIGNED BY: IM
	<b>MOODY 18 STATE COM #001H RELEASE          APPROXIMATE RELEASE LOCATION MAP</b>	Figure No. <b>3</b>

DOCUMENT PATH: C:\USERS\ISABEL.MARMOLEJO\DESKTOP\GIS\CONOCO PHILIPS\212C-MD-02660\_MOODY 18 STATE COM #001H RELEASE\FIGURE 4 SITE LOCATION\_MOODY 18 STATE COM #001H.MXD



**Legend**

- Approximate Release Point
- Hand Auger Boring Locations
- Approximate Location of Former Frac Tanks

Source: Google Earth Imagery, 2019.



www.tetrattech.com  
 901 West Wall Street, Suite 100  
 Midland, Texas 79701  
 Phone: (432) 682-4559  
 Fax: (432) 682-3946

CONOCOPHILLIPS

NJMW1308640545  
 (32.136102°, -104.134456°)  
 EDDY COUNTY, NEW MEXICO

**MOODY 18 STATE COM #001H RELEASE  
 SITE ASSESSMENT MAP**

PROJECT NO.: 212C-MD-02660

DATE: FEBRUARY 08, 2022

DESIGNED BY: IM

Figure No.

**4**

# **TABLE**

TABLE 1  
 SUMMARY OF ANALYTICAL RESULTS  
 2019 SOIL ASSESSMENT- NJMW1308640545  
 HERITAGE CONCHO  
 MOODY 18 STATE COM #001H  
 EDDY COUNTY, NM

Sample ID	Sample Date	Sample Depth	Chloride <sup>1</sup>		BTEX <sup>1</sup>								TPH <sup>2</sup>						
					Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO		DRO		Total TPH (GRO+DRO)
					mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	C <sub>6</sub> - C <sub>10</sub>	Q	> C <sub>10</sub> - C <sub>28</sub>	Q	
AH-1	3/26/2019	0 - 1	222		< 0.002		< 0.002		< 0.002		< 0.002		< 0.002		< 15.0		< 15.0		< 15.0
AH-2	3/26/2019	0 - 1	202		< 0.002		< 0.002		< 0.002		< 0.002		< 0.002		23.9		< 15.0		23.9

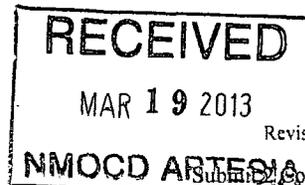
NOTES:

- ft. Feet
- bgs Below ground surface
- mg/kg Milligrams per kilogram
- TPH Total Petroleum Hydrocarbons
- GRO Gasoline range organics
- DRO Diesel range organics
- 1 Method 8021B
- 2 Method 8015M

# **APPENDIX A C-141 Forms**

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
1301 W. Grand Avenue, 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 October 10, 2003

Submit 2 copies to appropriate District Office in accordance with Rule 116 on back side of form

**Release Notification and Corrective Action**

*njmw* 1308640545 OPERATOR  Initial Report  Final Report

Name of Company	COG OPERATING LLC 229137	Contact	Pat Ellis
Address	600 West Illinois Avenue, Midland, TX 79701	Telephone No.	432-230-0077
Facility Name	MOODY 18 STATE COM #001H	Facility Type	TANK BATTERY
Surface Owner	STATE	Mineral Owner	
		Lease No. (API#)	30-015-39585

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
D	15	25S	28E					EDDY

Latitude 32.13647 Longitude 104.13432

**NATURE OF RELEASE**

Type of Release	Oil	Volume of Release	20bbls	Volume Recovered	10bbls
Source of Release	Storage Tank	Date and Hour of Occurrence	03-02-2013	Date and Hour of Discovery	03-02-2013 4:00pm
Was Immediate Notice Given?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?			
By Whom?		Date and Hour			
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.*					
A storage tank over flowed on the Moody 18 State Com #001H. Measure the storage tanks prior to unloading any fluids into tank.					
Describe Area Affected and Cleanup Action Taken.*					
Initially an estimated 20bbls were released due to a storage tank that overflowed on location. We were able to recover 10bbls with a vacuum truck. All free fluids have been recovered. The entire spill was contained on the location. Tetra Tech will sample the spill site area to delineate any possible contamination from the release and we will present a 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.					

Signature:		<b>OIL CONSERVATION DIVISION</b>	
Printed Name:	Josh Russo	Approved by District Supervisor:	Signed By
Title:	Senior Environmental Coordinator	Approval Date:	MAR 27 2013
E-mail Address:	jrusso@concho.com	Expiration Date:	
Date:	03-12-2013	Conditions of Approval:	Attached <input type="checkbox"/>
Phone:	432-212-2399		

\* Attach Additional Sheets if Necessary

Remediation per OCD Rule & Guidelines. **SUBMIT REMEDIATION PROPOSAL NO LATER THAN:**

April 27, 2013

*2RP-1591*

Incident ID	NJMW1308640545
District RP	2RP-1591
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?	63 _____ (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

**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	NJMW1308640545
District RP	2RP-1591
Facility ID	
Application ID	

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.

Printed Name: Charles R. Beauvais II Title: Senior Environmental Engineer

Signature: Charles R. Beauvais II Date: 2/15/2022

email: charles.r.beauvais@conocophillips.com Telephone: 575-988-2043

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

State of New Mexico  
Oil Conservation Division

Incident ID	NJMW1308640545
District RP	2RP-1591
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: Charles R. Beauvais II Title: Senior Environmental Engineer  
 Signature: Charles R. Beauvais II Date: 2/15/2022  
 email: charles.r.beauvais@conocophillips.com Telephone: 575-988-2043

**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: Bradford Billings Date: 03/02/2022  
 Printed Name: Bradford Billings Title: Envi.Spec.A

# **APPENDIX B**

## **Site Characterization Data**



# 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 Number	Code	POD Sub-basin	County	Q 64	Q 16	Q 4	Sec 18	Tws 25S	Rng 28E	X 582266	Y 3554864	Distance	DepthWell	DepthWater	Water Column
<a href="#">C_03861</a>	POD1	C	ED	4	2	3	18	25S	28E	582266	3554864	1169	91	63	28

Average Depth to Water: **63 feet**

Minimum Depth: **63 feet**

Maximum Depth: **63 feet**

**Record Count:** 1

**UTMNAD83 Radius Search (in meters):**

**Easting (X):** 581636

**Northing (Y):** 3555850

**Radius:** 1200

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.

2/1/22 3:00 PM

WATER COLUMN/ AVERAGE DEPTH TO WATER

# Moody 18 State

Karst Potential

**Legend**

-  Approximate Release Location
-  High
-  Low
-  Medium

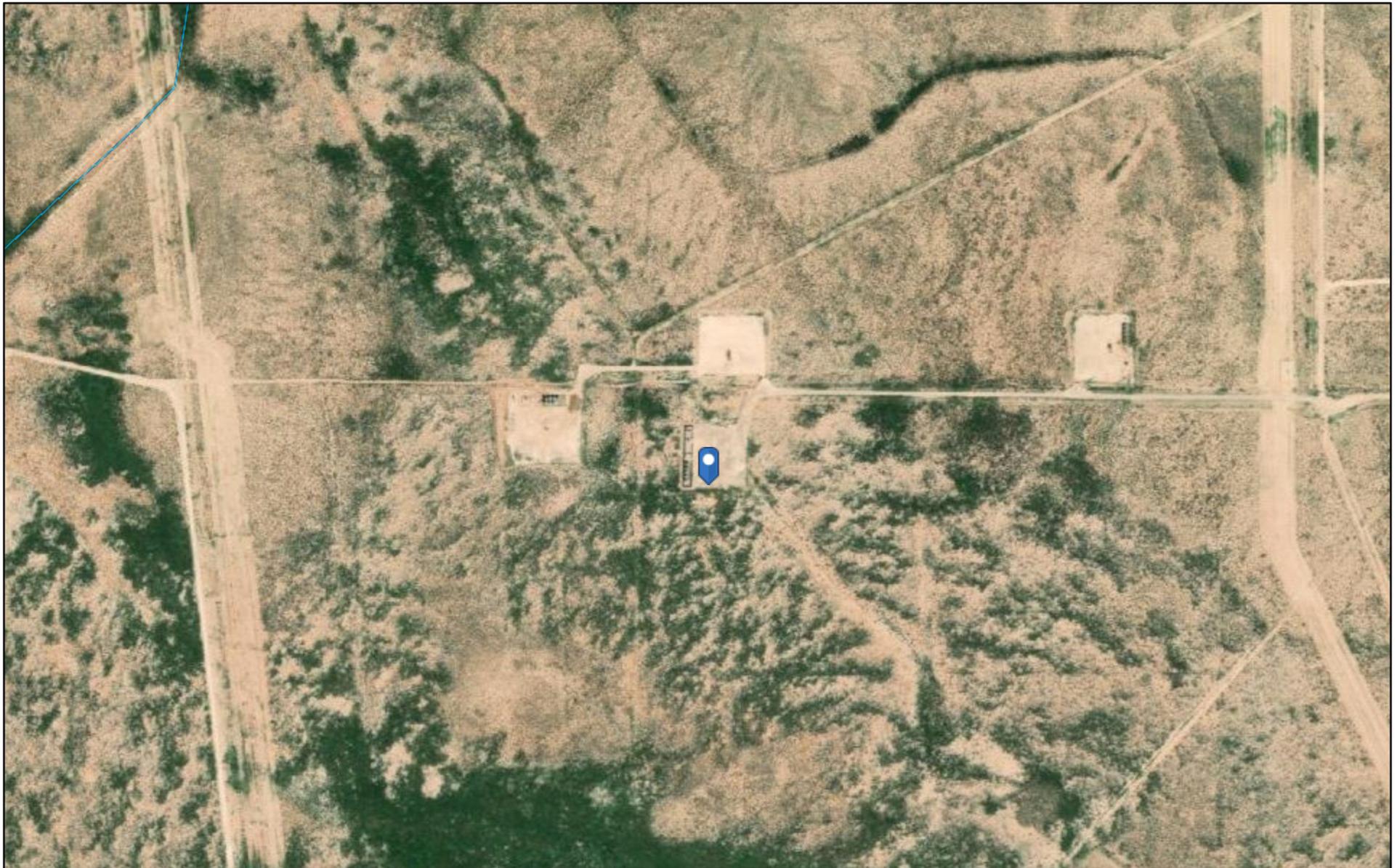
Malaga

 Approximate Release Location



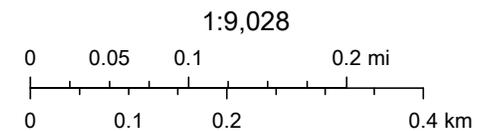
4 mi

# OCD Water Bodies



2/1/2022, 4:02:21 PM

- ★ OCD District Offices
- PLJV Probable Playas
- OSE Water-bodies
- OSE Streams



OCD, Maxar

# **APPENDIX C**

## **Laboratory Analytical Data**



# Certificate of Analysis Summary 619641

COG Operating LLC, Artesia, NM

Project Name: Moody 18 St Com #001H (3-2-13) 2RP-1591



**Project Id:**  
**Contact:** Ike Tavarez  
**Project Location:** Eddy County, NM

**Date Received in Lab:** Mon Apr-01-19 03:53 pm  
**Report Date:** 04-APR-19  
**Project Manager:** Kalei Stout

<b>Analysis Requested</b>	<b>Lab Id:</b>	619641-001	619641-002			
	<b>Field Id:</b>	AH-1 0-1' (Refusal)	AH-2 0-1' (Refusal)			
	<b>Depth:</b>	0-1 ft	0-1 ft			
	<b>Matrix:</b>	SOIL	SOIL			
	<b>Sampled:</b>	Mar-26-19 00:00	Mar-26-19 00:00			
<b>BTEX by EPA 8021B</b>	<b>Extracted:</b>	Apr-03-19 15:45	Apr-03-19 15:45			
	<b>Analyzed:</b>	Apr-03-19 17:51	Apr-03-19 18:10			
	<b>Units/RL:</b>	mg/kg RL	mg/kg RL			
Benzene		<0.00200 0.00200	<0.00200 0.00200			
Toluene		<0.00200 0.00200	<0.00200 0.00200			
Ethylbenzene		<0.00200 0.00200	<0.00200 0.00200			
m,p-Xylenes		<0.00399 0.00399	<0.00400 0.00400			
o-Xylene		<0.00200 0.00200	<0.00200 0.00200			
Total Xylenes		<0.00200 0.00200	<0.00200 0.00200			
Total BTEX		<0.00200 0.00200	<0.00200 0.00200			
<b>Chloride by EPA 300</b>	<b>Extracted:</b>	Apr-01-19 16:00	Apr-01-19 16:00			
	<b>Analyzed:</b>	Apr-02-19 09:33	Apr-02-19 00:08			
	<b>Units/RL:</b>	mg/kg RL	mg/kg RL			
Chloride		222 5.00	202 50.0			
<b>TPH By SW8015 Mod</b>	<b>Extracted:</b>	Apr-02-19 16:00	Apr-02-19 16:00			
	<b>Analyzed:</b>	Apr-03-19 00:00	Apr-03-19 00:19			
	<b>Units/RL:</b>	mg/kg RL	mg/kg RL			
Gasoline Range Hydrocarbons		<15.0 15.0	23.9 15.0			
Diesel Range Organics		<15.0 15.0	<15.0 15.0			
Motor Oil Range Hydrocarbons (MRO)		<15.0 15.0	<15.0 15.0			
Total TPH		<15.0 15.0	23.9 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

Kalei Stout  
 Midland Laboratory Director

# Analytical Report 619641

for  
**COG Operating LLC**

**Project Manager: Ike Tavaréz**  
**Moody 18 St Com #001H (3-2-13) 2RP-1591**

**04-APR-19**

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), North Carolina (483)  
Xenco-Lakeland: Florida (E84098)



04-APR-19

Project Manager: **Ike Tavarez**  
**COG Operating LLC**  
2407 Pecos Avenue  
Artesia, NM 88210

Reference: XENCO Report No(s): **619641**  
**Moody 18 St Com #001H (3-2-13) 2RP-1591**  
Project Address: Eddy County, 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) 619641. 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. 619641 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,

**Kalei Stout**

Midland Laboratory Director

*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 619641

COG Operating LLC, Artesia, NM

Moody 18 St Com #001H (3-2-13) 2RP-1591

Sample Id	Matrix	Date Collected	Sample Depth	Lab Sample Id
AH-1 0-1' (Refusal)	S	03-26-19 00:00	0 - 1 ft	619641-001
AH-2 0-1' (Refusal)	S	03-26-19 00:00	0 - 1 ft	619641-002



## CASE NARRATIVE

*Client Name: COG Operating LLC*

*Project Name: Moody 18 St Com #001H (3-2-13) 2RP-1591*

Project ID:  
Work Order Number(s): 619641

Report Date: 04-APR-19  
Date Received: 04/01/2019

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**Sample receipt non conformances and comments:**

None

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**Sample receipt non conformances and comments per sample:**

None

**Analytical non conformances and comments:**

Batch: LBA-3084502 BTEX by EPA 8021B

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

Surrogate 4-Bromofluorobenzene recovered above QC limits. Matrix interferences is suspected.

Samples affected are: 619641-001.



# Certificate of Analytical Results 619641

**COG Operating LLC, Artesia, NM**  
 Moody 18 St Com #001H (3-2-13) 2RP-1591

Sample Id: **AH-1 0-1' (Refusal)** Matrix: Soil Date Received: 04.01.19 15.53  
 Lab Sample Id: 619641-001 Date Collected: 03.26.19 00.00 Sample Depth: 0 - 1 ft  
 Analytical Method: Chloride by EPA 300 Prep Method: E300P  
 Tech: SPC % Moisture:  
 Analyst: SPC Date Prep: 04.01.19 16.00 Basis: Wet Weight  
 Seq Number: 3084174

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	222	5.00	mg/kg	04.02.19 09.33		1

Analytical Method: TPH By SW8015 Mod Prep Method: TX1005P  
 Tech: ARM % Moisture:  
 Analyst: ARM Date Prep: 04.02.19 16.00 Basis: Wet Weight  
 Seq Number: 3084425

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Gasoline Range Hydrocarbons	PHC610	<15.0	15.0	mg/kg	04.03.19 00.00	U	1
Diesel Range Organics	C10C28DRO	<15.0	15.0	mg/kg	04.03.19 00.00	U	1
Motor Oil Range Hydrocarbons (MRO)	PHCG2835	<15.0	15.0	mg/kg	04.03.19 00.00	U	1
Total TPH	PHC635	<15.0	15.0	mg/kg	04.03.19 00.00	U	1

Surrogate	Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
1-Chlorooctane	111-85-3	89	%	70-135	04.03.19 00.00	
o-Terphenyl	84-15-1	87	%	70-135	04.03.19 00.00	



# Certificate of Analytical Results 619641



## COG Operating LLC, Artesia, NM Moody 18 St Com #001H (3-2-13) 2RP-1591

Sample Id: <b>AH-1 0-1' (Refusal)</b>	Matrix: Soil	Date Received: 04.01.19 15.53
Lab Sample Id: 619641-001	Date Collected: 03.26.19 00.00	Sample Depth: 0 - 1 ft
Analytical Method: BTEX by EPA 8021B		Prep Method: SW5030B
Tech: SCM		% Moisture:
Analyst: SCM	Date Prep: 04.03.19 15.45	Basis: Wet Weight
Seq Number: 3084502		

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Benzene	71-43-2	<0.00200	0.00200	mg/kg	04.03.19 17.51	U	1
Toluene	108-88-3	<0.00200	0.00200	mg/kg	04.03.19 17.51	U	1
Ethylbenzene	100-41-4	<0.00200	0.00200	mg/kg	04.03.19 17.51	U	1
m,p-Xylenes	179601-23-1	<0.00399	0.00399	mg/kg	04.03.19 17.51	U	1
o-Xylene	95-47-6	<0.00200	0.00200	mg/kg	04.03.19 17.51	U	1
Total Xylenes	1330-20-7	<0.00200	0.00200	mg/kg	04.03.19 17.51	U	1
Total BTEX		<0.00200	0.00200	mg/kg	04.03.19 17.51	U	1
<b>Surrogate</b>	<b>Cas Number</b>	<b>% Recovery</b>		<b>Units</b>	<b>Limits</b>	<b>Analysis Date</b>	<b>Flag</b>
1,4-Difluorobenzene	540-36-3	102		%	70-130	04.03.19 17.51	
4-Bromofluorobenzene	460-00-4	132		%	70-130	04.03.19 17.51	**



# Certificate of Analytical Results 619641

**COG Operating LLC, Artesia, NM**  
 Moody 18 St Com #001H (3-2-13) 2RP-1591

Sample Id: **AH-2 0-1' (Refusal)** Matrix: Soil Date Received: 04.01.19 15.53  
 Lab Sample Id: 619641-002 Date Collected: 03.26.19 00.00 Sample Depth: 0 - 1 ft  
 Analytical Method: Chloride by EPA 300 Prep Method: E300P  
 Tech: SPC % Moisture:  
 Analyst: SPC Date Prep: 04.01.19 16.00 Basis: Wet Weight  
 Seq Number: 3084174

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	202	50.0	mg/kg	04.02.19 00.08		10

Analytical Method: TPH By SW8015 Mod Prep Method: TX1005P  
 Tech: ARM % Moisture:  
 Analyst: ARM Date Prep: 04.02.19 16.00 Basis: Wet Weight  
 Seq Number: 3084425

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Gasoline Range Hydrocarbons	PHC610	23.9	15.0	mg/kg	04.03.19 00.19		1
Diesel Range Organics	C10C28DRO	<15.0	15.0	mg/kg	04.03.19 00.19	U	1
Motor Oil Range Hydrocarbons (MRO)	PHCG2835	<15.0	15.0	mg/kg	04.03.19 00.19	U	1
<b>Total TPH</b>	PHC635	<b>23.9</b>	15.0	mg/kg	04.03.19 00.19		1

Surrogate	Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
1-Chlorooctane	111-85-3	82	%	70-135	04.03.19 00.19	
o-Terphenyl	84-15-1	77	%	70-135	04.03.19 00.19	



# Certificate of Analytical Results 619641



## COG Operating LLC, Artesia, NM Moody 18 St Com #001H (3-2-13) 2RP-1591

Sample Id: <b>AH-2 0-1' (Refusal)</b>	Matrix: Soil	Date Received: 04.01.19 15.53
Lab Sample Id: 619641-002	Date Collected: 03.26.19 00.00	Sample Depth: 0 - 1 ft
Analytical Method: BTEX by EPA 8021B		Prep Method: SW5030B
Tech: SCM		% Moisture:
Analyst: SCM	Date Prep: 04.03.19 15.45	Basis: Wet Weight
Seq Number: 3084502		

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Benzene	71-43-2	<0.00200	0.00200	mg/kg	04.03.19 18.10	U	1
Toluene	108-88-3	<0.00200	0.00200	mg/kg	04.03.19 18.10	U	1
Ethylbenzene	100-41-4	<0.00200	0.00200	mg/kg	04.03.19 18.10	U	1
m,p-Xylenes	179601-23-1	<0.00400	0.00400	mg/kg	04.03.19 18.10	U	1
o-Xylene	95-47-6	<0.00200	0.00200	mg/kg	04.03.19 18.10	U	1
Total Xylenes	1330-20-7	<0.00200	0.00200	mg/kg	04.03.19 18.10	U	1
Total BTEX		<0.00200	0.00200	mg/kg	04.03.19 18.10	U	1
<b>Surrogate</b>	<b>Cas Number</b>	<b>% Recovery</b>	<b>Units</b>	<b>Limits</b>	<b>Analysis Date</b>	<b>Flag</b>	
4-Bromofluorobenzene	460-00-4	101	%	70-130	04.03.19 18.10		
1,4-Difluorobenzene	540-36-3	109	%	70-130	04.03.19 18.10		





**COG Operating LLC**  
Moody 18 St Com #001H (3-2-13) 2RP-1591

**Analytical Method: Chloride by EPA 300**

Seq Number: 3084174

MB Sample Id: 7674829-1-BLK

Matrix: Solid

LCS Sample Id: 7674829-1-BKS

Prep Method: E300P

Date Prep: 04.01.19

LCSD Sample Id: 7674829-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	<0.858	250	258	103	259	104	90-110	0	20	mg/kg	04.01.19 20:03	

**Analytical Method: Chloride by EPA 300**

Seq Number: 3084174

Parent Sample Id: 619466-008

Matrix: Soil

MS Sample Id: 619466-008 S

Prep Method: E300P

Date Prep: 04.01.19

MSD Sample Id: 619466-008 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	492	250	722	92	724	93	90-110	0	20	mg/kg	04.01.19 20:33	

**Analytical Method: Chloride by EPA 300**

Seq Number: 3084174

Parent Sample Id: 619487-001

Matrix: Soil

MS Sample Id: 619487-001 S

Prep Method: E300P

Date Prep: 04.01.19

MSD Sample Id: 619487-001 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	519	250	748	92	749	92	90-110	0	20	mg/kg	04.01.19 22:50	

**Analytical Method: TPH By SW8015 Mod**

Seq Number: 3084425

MB Sample Id: 7674881-1-BLK

Matrix: Solid

LCS Sample Id: 7674881-1-BKS

Prep Method: TX1005P

Date Prep: 04.02.19

LCSD Sample Id: 7674881-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Gasoline Range Hydrocarbons	<8.00	1000	1020	102	1150	115	70-135	12	20	mg/kg	04.02.19 22:22	
Diesel Range Organics	<8.13	1000	1130	113	1210	121	70-135	7	20	mg/kg	04.02.19 22:22	

Surrogate	MB %Rec	MB Flag	LCS %Rec	LCS Flag	LCSD %Rec	LCSD Flag	Limits	Units	Analysis Date
1-Chlorooctane	93		118		98		70-135	%	04.02.19 22:22
o-Terphenyl	95		112		128		70-135	%	04.02.19 22:22

MS/MSD Percent Recovery  
Relative Percent Difference  
LCS/LCSD Recovery  
Log Difference

[D] = 100\*(C-A) / B  
RPD = 200\* |(C-E) / (C+E)|  
[D] = 100 \* (C) / [B]  
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



COG Operating LLC  
Moody 18 St Com #001H (3-2-13) 2RP-1591

Analytical Method: TPH By SW8015 Mod

Seq Number: 3084425

Parent Sample Id: 619640-001

Matrix: Soil

MS Sample Id: 619640-001 S

Prep Method: TX1005P

Date Prep: 04.02.19

MSD Sample Id: 619640-001 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD	Limit	Units	Analysis Date	Flag
Gasoline Range Hydrocarbons	8.61	996	990	99	1120	111	70-135	12	20		mg/kg	04.02.19 23:21	
Diesel Range Organics	10.7	996	1070	106	1140	113	70-135	6	20		mg/kg	04.02.19 23:21	

Surrogate	MS %Rec	MS Flag	MSD %Rec	MSD Flag	Limits	Units	Analysis Date
1-Chlorooctane	116		129		70-135	%	04.02.19 23:21
o-Terphenyl	109		107		70-135	%	04.02.19 23:21

Analytical Method: BTEX by EPA 8021B

Seq Number: 3084502

MB Sample Id: 7674976-1-BLK

Matrix: Solid

LCS Sample Id: 7674976-1-BKS

Prep Method: SW5030B

Date Prep: 04.03.19

LCSD Sample Id: 7674976-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD	Limit	Units	Analysis Date	Flag
Benzene	<0.00200	0.0998	0.102	102	0.0974	98	70-130	5	35		mg/kg	04.03.19 15:39	
Toluene	<0.00200	0.0998	0.0955	96	0.0916	92	70-130	4	35		mg/kg	04.03.19 15:39	
Ethylbenzene	<0.00200	0.0998	0.0966	97	0.0925	93	70-130	4	35		mg/kg	04.03.19 15:39	
m,p-Xylenes	<0.00101	0.200	0.190	95	0.182	92	70-130	4	35		mg/kg	04.03.19 15:39	
o-Xylene	<0.00200	0.0998	0.0955	96	0.0916	92	70-130	4	35		mg/kg	04.03.19 15:39	

Surrogate	MB %Rec	MB Flag	LCS %Rec	LCS Flag	LCSD %Rec	LCSD Flag	Limits	Units	Analysis Date
1,4-Difluorobenzene	105		102		102		70-130	%	04.03.19 15:39
4-Bromofluorobenzene	94		92		94		70-130	%	04.03.19 15:39

Analytical Method: BTEX by EPA 8021B

Seq Number: 3084502

Parent Sample Id: 619640-001

Matrix: Soil

MS Sample Id: 619640-001 S

Prep Method: SW5030B

Date Prep: 04.03.19

MSD Sample Id: 619640-001 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD	Limit	Units	Analysis Date	Flag
Benzene	<0.000387	0.101	0.0728	72	0.0669	67	70-130	8	35		mg/kg	04.03.19 16:17	X
Toluene	<0.000458	0.101	0.0683	68	0.0618	62	70-130	10	35		mg/kg	04.03.19 16:17	X
Ethylbenzene	<0.000568	0.101	0.0674	67	0.0600	60	70-130	12	35		mg/kg	04.03.19 16:17	X
m,p-Xylenes	<0.00102	0.201	0.134	67	0.119	60	70-130	12	35		mg/kg	04.03.19 16:17	X
o-Xylene	<0.000346	0.101	0.0677	67	0.0601	60	70-130	12	35		mg/kg	04.03.19 16:17	X

Surrogate	MS %Rec	MS Flag	MSD %Rec	MSD Flag	Limits	Units	Analysis Date
1,4-Difluorobenzene	105		106		70-130	%	04.03.19 16:17
4-Bromofluorobenzene	101		101		70-130	%	04.03.19 16:17

MS/MSD Percent Recovery  
Relative Percent Difference  
LCS/LCSD Recovery  
Log Difference

[D] = 100\*(C-A) / B  
RPD = 200\* |(C-E) / (C+E)|  
[D] = 100 \* (C) / [B]  
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





# XENCO Laboratories Prelogin/Nonconformance Report- Sample Log-In

Client: COG Operating LLC

Date/ Time Received: 04/01/2019 03:53:00 PM

Work Order #: 619641

Acceptable Temperature Range: 0 - 6 degC  
Air and Metal samples Acceptable Range: Ambient  
Temperature Measuring device used : R8

Sample Receipt Checklist	Comments
#1 *Temperature of cooler(s)?	3.2
#2 *Shipping container in good condition?	Yes
#3 *Samples received on ice?	Yes
#4 *Custody Seals intact on shipping container/ cooler?	N/A
#5 Custody Seals intact on sample bottles?	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 relinquished/ received?	Yes
#10 Chain of Custody agrees with sample labels/matrix?	Yes
#11 Container label(s) legible and intact?	Yes
#12 Samples in proper container/ bottle?	Yes
#13 Samples properly preserved?	Yes
#14 Sample container(s) intact?	Yes
#15 Sufficient sample amount for indicated test(s)?	Yes
#16 All samples received within hold time?	Yes
#17 Subcontract of sample(s)?	No
#18 Water VOC samples have zero headspace?	N/A

\* Must be completed for after-hours delivery of samples prior to placing in the refrigerator

Analyst:

PH Device/Lot#:

Checklist completed by:   
Katie Lowe

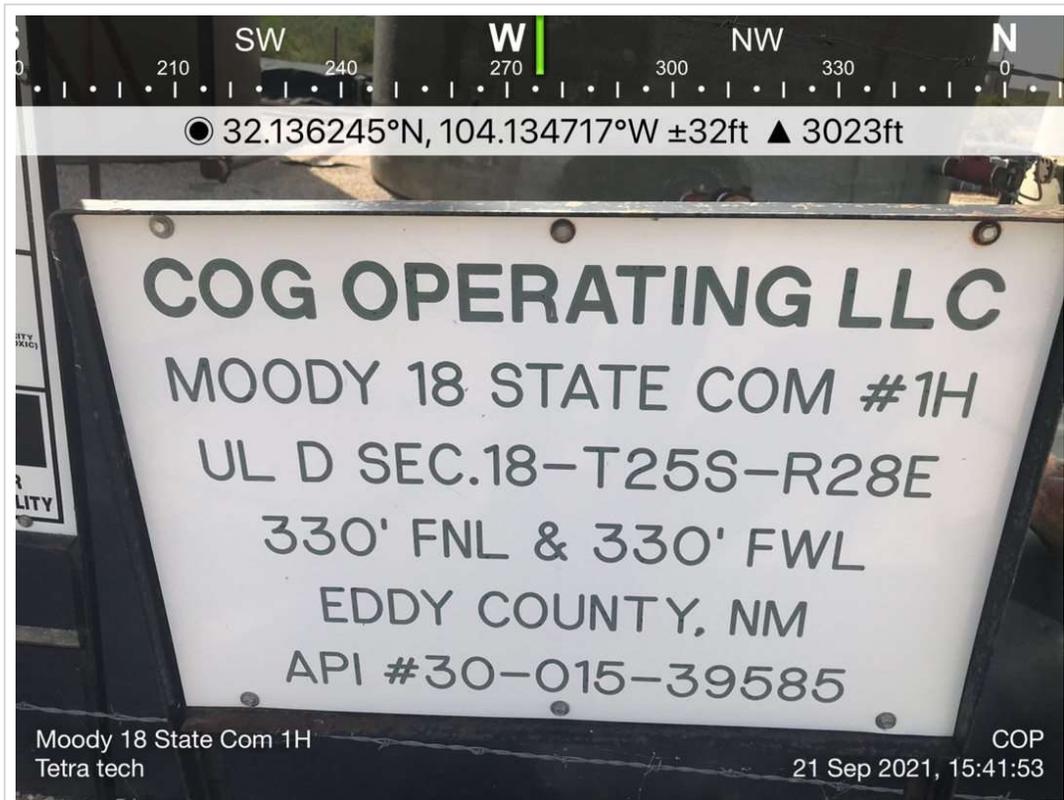
Date: 04/01/2019

Checklist reviewed by:   
Kalei Stout

Date: 04/03/2019

# **APPENDIX D**

## **Photographic Documentation**



TETRA TECH, INC. PROJECT NO. 212C-MD-02578	DESCRIPTION	View west of Moody 18 State Com #1H signage	1
	SITE NAME	HConcho - MOODY 18 STATE COM #001H	9/21/2021



TETRA TECH, INC. PROJECT NO. 212C-MD-02578	DESCRIPTION	View east of the release area and lease pad.	2
	SITE NAME	HConcho - MOODY 18 STATE COM #001H	9/21/2021



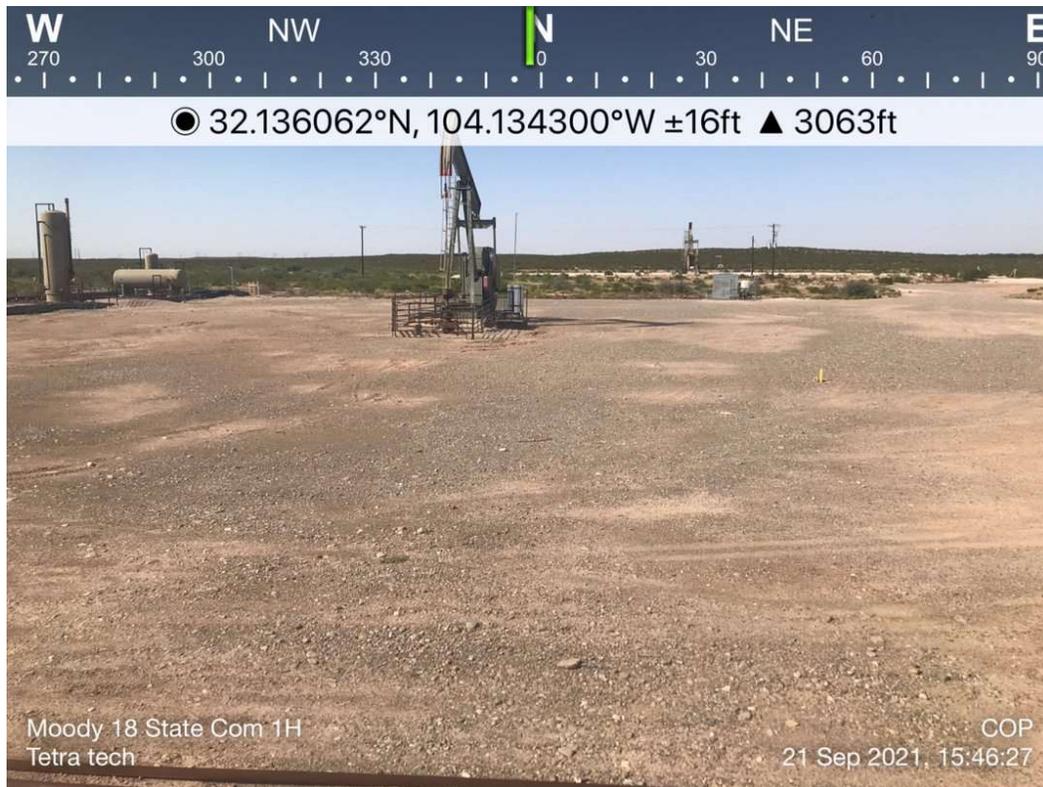
TETRA TECH, INC. PROJECT NO. 212C-MD-02578	DESCRIPTION	View south of the release area and lease pad.	3
	SITE NAME	HConcho - MOODY 18 STATE COM #001H	9/21/2021



TETRA TECH, INC. PROJECT NO. 212C-MD-02578	DESCRIPTION	View west of the existing tanks and lease pad.	4
	SITE NAME	HConcho - MOODY 18 STATE COM #001H	9/21/2021



TETRA TECH, INC. PROJECT NO. 212C-MD-02578	DESCRIPTION	View south of the release area and pasture.	5
	SITE NAME	HConcho - MOODY 18 STATE COM #001H	9/21/2021



TETRA TECH, INC. PROJECT NO. 212C-MD-02578	DESCRIPTION	View north of the release area and lease pad.	6
	SITE NAME	HConcho - MOODY 18 STATE COM #001H	9/21/2021

**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 82015

**CONDITIONS**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 82015
	Action Type: [C-141] Release Corrective Action (C-141)

**CONDITIONS**

Created By	Condition	Condition Date
bbillings	None	3/4/2022