

# Closure Report

## Site Description

Site Name:	Spruce Goose Fed Com #2H & #3H
Company:	COG Operating LLC
Legal Description:	U/L E, Section 7, T19S, R32E
County:	Lea County, NM
GPS Coordinates:	N 32.67696° W 103.81364°

## Release Data

Date of Release:	01/16/2017
Type of Release:	Produced water
Source of Release:	Valve
Volume of Release:	23 bbls
Volume Recovered:	22 bbls

## Remediation Specifications

Remediation Parameters:	Excavate the entire leak area to a depth of 6 inches. Backfill the site with clean soil.	
Remediation Activities:	10/26/2017 to 10/31/2017	
Plan Sent to OCD:	03/23/2017	Email from Cliff Brunson to Olivia Yu
OCD Approval of Plan:	04/12/2017	Email from Olivia Yu to Cliff Brunson
Plan Sent to BLM:	03/23/2017	Email from Cliff Brunson to Shelly Tucker
SLO Approval of Plan:	09/18/2017	Email from Henryetta Price to Cliff Brunson

## Supporting Documentation

Initial C-141	Signed 01/17/2017
Final C-141	Upon completion
Site Diagram	March 2017
Groundwater Plot	425'
TOPO Maps	March 2017
Lab Summary	02/03/2017
Lab Analysis	02/03/2017
Correspondence	Request and approval of remediation plan via email

## Request for Closure

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

Cliff Brunson, President of BBC International Inc.

11/06/2017

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Received by OCD: 11/10/2022 12:46:01 PM  
Released to Imaging: 11/10/2022 12:51:00 PM

District I  
625 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. 432-683-7443
Facility Name: Spruce Goose Federal Com 2H&3H	Facility Type: Tank Battery

Surface Owner: Federal	Mineral Owner:	API No. 30-025-43169
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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
E	07	19S	32E	1980	North	210	West	Lea

Latitude 32.67685419 Longitude -103.8136099

#### NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: 23 bbls	Volume Recovered: 22 bbls
Source of Release: Valve	Date and Hour of Occurrence: January 16, 2017 7:00 pm	Date and Hour of Discovery: January 16, 2017 7:00 pm
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.\*

The release was caused by a third party leaving the valve partially open. The valve was shutoff.

Describe Area Affected and Cleanup Action Taken.\*

The release was on location. A vacuum truck was dispatched to remove all freestanding fluids. Concho will have the spill area sampled subsequent to remediation by third party responsible for the release to verify remediation is complete.

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: <i>Rebecca Haskell</i>	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Rebecca Haskell	Approved by Environmental Specialist:	
Title: Senior HSE Coordinator	Approval Date:	Expiration Date:
E-mail Address: <a href="mailto:rhaskell@concho.com">rhaskell@concho.com</a>	Conditions of Approval:	Attached <input type="checkbox"/>
Date: January 17, 2017 Phone: 432-683-7443		

Attach Additional Sheets If Necessary

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
311 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. 432-683-7443
Facility Name: Spruce Goose Federal Com #2H & 3H	Facility Type: Tank Battery
Surface Owner: Federal	Mineral Owner: Federal
API No. 30-025-43169	

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
E	07	19S	32E	1980	North	210	West	Lea County, NM

Latitude N 32.67696° Longitude W 103.81364°

**NATURE OF RELEASE**

Type of Release: Produced water	Volume of Release: 23 bbls	Volume Recovered: 22 bbls
Source of Release: Valve	Date and Hour of Occurrence 01/16/2017 @ 7:00 pm	Date and Hour of Discovery 01/16/2017 @ 7:00 pm
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.\*  
This release was caused by a third party leaving the valve partially open. The valve was shut off.

Describe Area Affected and Cleanup Action Taken.\*  
This release occurred on location. Vacuum trucks were dispatched to recover standing fluids. The site was delineated according to OCD standards and a remediation plan was created. Remediation was completed in accordance with the remediation plan approved by Olivia Yu of NMOCD via email on 04/12/2017 and approved by Henryetta Price of the BLM via email on 09/18/2017.

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: <i>Rebecca Haskell</i>	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Rebecca Haskell	Approved by Environmental Specialist: <i>Ashley Maxwell</i>	
Title: Senior HSE Coordinator	Approval Date: 11/10/2022	Expiration Date:
E-mail Address: rhaskell@concho.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: November 2, 2017	Phone: (432) 683-7443	

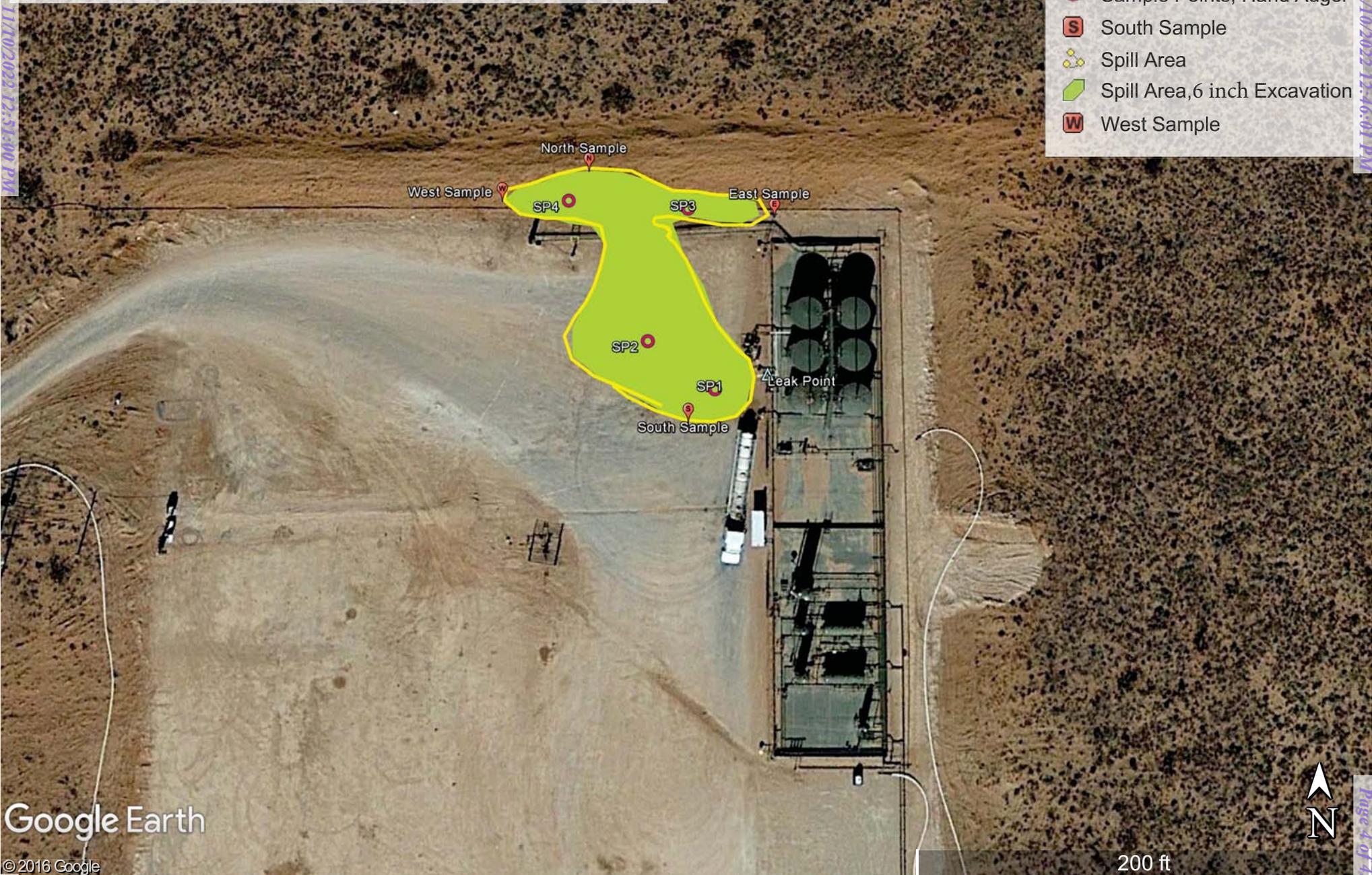
Attach Additional Sheets If Necessary

# COG, Spruce Goose Fed Com #2H & #3H

Leak Date: 01/16/2017  
Lea County, NM  
API# 30-025-43169  
RP# 1RP-4565

### Legend

-  East Sample
-  Leak Point
-  North Sample
-  Sample Points, Hand Auger
-  South Sample
-  Spill Area
-  Spill Area, 6 inch Excavation
-  West Sample



Google Earth

© 2016 Google

200 ft

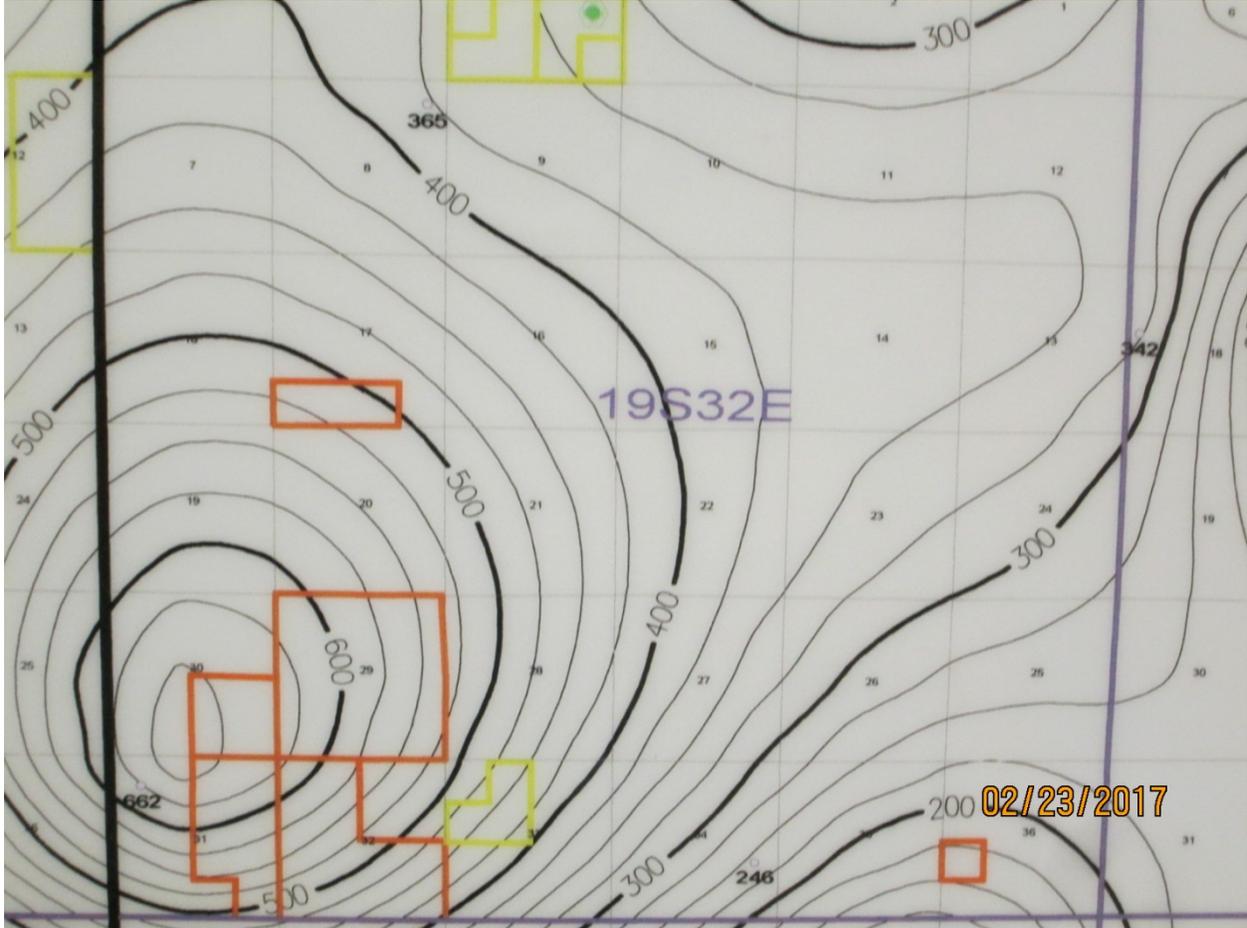


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**COG, Spruce Goose Fed Com #2H & #3H**  
**U/L E, Section 7, T19S, R32E**  
**Groundwater: 425'**





# New Mexico Office of the State Engineer Water Column/Average Depth to Water

(quarters are 1=NW 2=NE 3=SW 4=SE)  
(quarters are smallest to largest) (NAD83 UTM in meters)

No records found.

**PLSS Search:**

**Q16:** SW    **Q4:** NW    **Section(s):** 7    **Township:** 19S    **Range:** 32E

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.

2/23/17 1:18 PM

WATER COLUMN/ AVERAGE  
DEPTH TO WATER



# New Mexico Office of the State Engineer Water Column/Average Depth to Water

(quarters are 1=NW 2=NE 3=SW 4=SE)  
(quarters are smallest to largest) (NAD83 UTM in meters)

No records found.

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

**Easting (X):** 611369

**Northing (Y):** 3616087

**Radius:** 205

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.

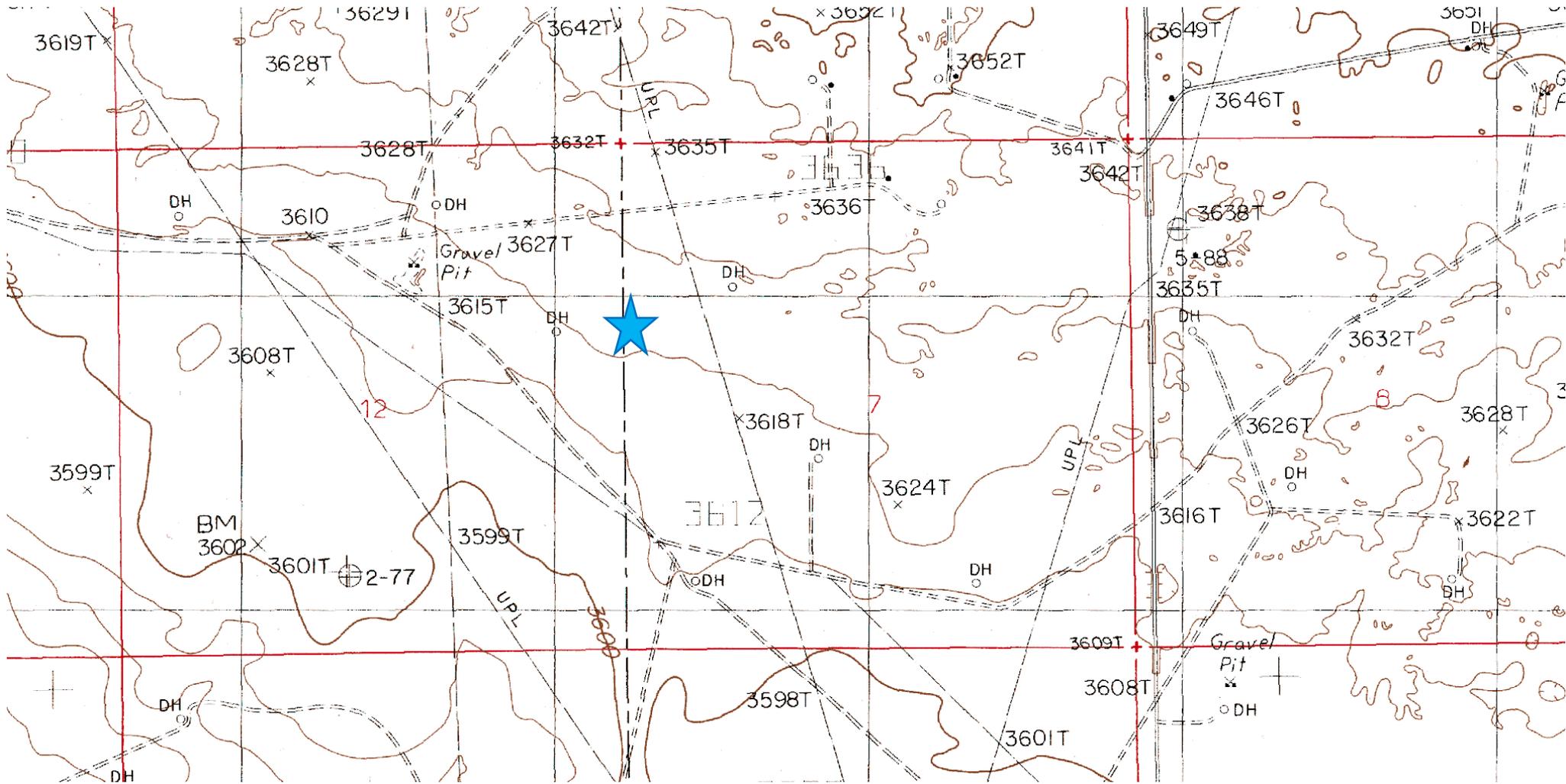
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WATER COLUMN/ AVERAGE  
DEPTH TO WATER



# COG

## Spruce Goose Federal Com #2H & #3H



Laboratory Analytical Results Summary  
Spruce Goose Fed Com #2H #3H

		Sample	SP1 @ 1'	SP1 @ 2'	SP1 @ 3'
Analyte	Method	Date	2/3/17	2/3/17	2/3/17
			mg/Kg	mg/Kg	mg/Kg
Chloride	SM4500CI-B		480	304	<16.0

		Sample	SP2 @ 1'	SP2 @ 2'	SP2 @ 3'
Analyte	Method	Date	2/3/17	2/3/17	2/3/17
			mg/Kg	mg/Kg	mg/Kg
Chloride	SM4500CI-B		304	336	16

		Sample	SP3 @ 1'	SP3 @ 2'	SP3 @ 3'	SP3 @ 4'
Analyte	Method	Date	2/3/17	2/3/17	2/3/17	2/3/17
			mg/Kg	mg/Kg	mg/Kg	mg/Kg
Chloride	SM4500CI-B		336	32	240	16

		Sample	SP4 @ 1'	SP4 @ 2'	SP4 @ 3'	SP4 @ 4'
Analyte	Method	Date	2/3/17	2/3/17	2/3/17	2/3/17
			mg/Kg	mg/Kg	mg/Kg	mg/Kg
Chloride	SM4500CI-B		272	32	176	16

		Sample	NORTH @ SURFACE
Analyte	Method	Date	2/3/17
			mg/Kg
Chloride	SM4500CI-B		32

		Sample	SOUTH @ SURFACE
Analyte	Method	Date	2/3/17
			mg/Kg
Chloride	SM4500CI-B		<16.0

		Sample	EAST @ SURFACE
Analyte	Method	Date	2/3/17
			mg/Kg
Chloride	SM4500CI-B		80

		Sample	WEST @ SURFACE
Analyte	Method	Date	2/3/17
			mg/Kg
Chloride	SM4500CI-B		16



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

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February 11, 2017

Cliff Brunson  
BBC International, Inc.  
P.O. Box 805  
Hobbs, NM 88241

RE: SPRUCE GOOSE FED COM #2H/3H

Enclosed are the results of analyses for samples received by the laboratory on 02/06/17 16:55.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-16-8. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene".

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:	02/06/2017	Sampling Date:	02/03/2017
Reported:	02/11/2017	Sampling Type:	Soil
Project Name:	SPRUCE GOOSE FED COM #2H/3H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	COG - 126		

**Sample ID: SP 1 @ 1' (H700299-01)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	480	16.0	02/09/2017	ND	400	100	400	11.3	

**Sample ID: SP 1 @ 2' (H700299-02)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	304	16.0	02/09/2017	ND	400	100	400	11.3	

**Sample ID: SP 1 @ 3' (H700299-03)**

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	02/09/2017	ND	400	100	400	11.3	

**Sample ID: SP 2 @ 1' (H700299-04)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	304	16.0	02/10/2017	ND	448	112	400	3.64	

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

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

Received:	02/06/2017	Sampling Date:	02/03/2017
Reported:	02/11/2017	Sampling Type:	Soil
Project Name:	SPRUCE GOOSE FED COM #2H/3H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	COG - 126		

**Sample ID: SP 2 @ 2' (H700299-05)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	336	16.0	02/10/2017	ND	448	112	400	3.64	

**Sample ID: SP 2 @ 3' (H700299-06)**

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	02/10/2017	ND	448	112	400	3.64	

**Sample ID: SP 3 @ 1' (H700299-07)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	336	16.0	02/10/2017	ND	448	112	400	3.64	

**Sample ID: SP 3 @ 2' (H700299-08)**

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	02/10/2017	ND	448	112	400	3.64	

**Sample ID: SP 3 @ 3' (H700299-09)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	240	16.0	02/10/2017	ND	448	112	400	3.64	

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

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

Received:	02/06/2017	Sampling Date:	02/03/2017
Reported:	02/11/2017	Sampling Type:	Soil
Project Name:	SPRUCE GOOSE FED COM #2H/3H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	COG - 126		

**Sample ID: SP 3 @ 4' (H700299-10)**

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	02/10/2017	ND	448	112	400	3.64	

**Sample ID: SP 4 @ 1' (H700299-11)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	272	16.0	02/10/2017	ND	448	112	400	3.64	

**Sample ID: SP 4 @ 2' (H700299-12)**

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	02/10/2017	ND	448	112	400	3.64	

**Sample ID: SP 4 @ 3' (H700299-13)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	176	16.0	02/10/2017	ND	448	112	400	3.64	

**Sample ID: SP 4 @ 4' (H700299-14)**

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	02/10/2017	ND	448	112	400	3.64	

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

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

Received:	02/06/2017	Sampling Date:	02/03/2017
Reported:	02/11/2017	Sampling Type:	Soil
Project Name:	SPRUCE GOOSE FED COM #2H/3H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	COG - 126		

**Sample ID: NORTH @ SURFACE (H700299-15)**

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	02/10/2017	ND	448	112	400	3.64	

**Sample ID: SOUTH @ SURFACE (H700299-16)**

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	02/10/2017	ND	448	112	400	3.64	

**Sample ID: EAST @ SURFACE (H700299-17)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	02/10/2017	ND	448	112	400	3.64	

**Sample ID: WEST @ SURFACE (H700299-18)**

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	02/10/2017	ND	448	112	400	3.64	

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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

Cardinal Laboratories

\*=Accredited Analyte

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*Celey D. Keene*

Celey D. Keene, Lab Director/Quality Manager



ARDINAL LABORATORIES

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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

1/2

BILL TO

ANALYSIS REQUEST

Company Name: BBC International, Inc. P.O. #:  
 Project Manager: Cliff Brunson Company:  
 Address: P.O. Box 805 State: NM zip: 88241  
 City: Hobbs Attn:  
 Phone #: 575-397-6388 Fax #: 575-397-0397 Address:  
 Project #: Project Owner: COLE  
 Project Name: Spruce Goose Fed Con #11/14 State: Zip:  
 Project Location: 126 Phone #:  
 Sampler Name: PH Fax #:  
 FOR LAB USE ONLY

Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX						PRESERV.	SAMPLING	DATE	TIME						
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :										
H700299	SP101	G	1			X	X	X	X	X	X	2-3	923	✓					
	SP201	G	1			X	X	X	X	X	X		1000	✓					
	SP202	G	1			X	X	X	X	X	X		1050	✓					
	SP301	G	1			X	X	X	X	X	X		1105	✓					
	SP302	G	1			X	X	X	X	X	X		1150	✓					
	SP303	G	1			X	X	X	X	X	X		105	✓					
	SP304	G	1			X	X	X	X	X	X		130	✓					
		G	1			X	X	X	X	X	X		144	✓					

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Relinquished By: [Signature] Date: 2-6-17 Received By: [Signature] Date: [Blank]  
 Relinquished By: [Signature] Date: [Blank] Received By: [Signature] Date: [Blank]

Delivered By: (Circle One) #75 -1.40  
 Sampler - UPS - Bus - Other:  Yes  No

Phone Result:  Yes  No Add'l Phone #:   
 Fax Result:  Yes  No Add'l Fax #:   
 REMARKS:

\* Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476



**From:** Yu, Olivia, EMNRD  
**To:** [Cliff Brunson](#); [Shelly Tucker](#)  
**Cc:** [Becky Haskell](#); [Ken Swinney](#); [Jennifer Gilkey](#); [Kathy Purvis](#)  
**Subject:** RE: COG - Spruce Goose Fed Com #2H & #3H (1RP-4565) - Delineation Workplan  
**Date:** Wednesday, April 12, 2017 1:59:27 PM  
**Attachments:** [Approved\\_RP4565\\_23Mar2017\\_Delineation\\_Workplan\\_Spruce\\_Goose\\_Fed\\_Com\\_#2H\\_&\\_#3H.pdf](#)

---

Dear Mr. Brunson:

The delineation workplan for 1RP-4565 is approved as written. Please see the attachment for your records.

Thanks,

Olivia Yu  
Environmental Specialist  
NMOCD, District I  
[Olivia.yu@state.nm.us](mailto:Olivia.yu@state.nm.us)  
575-393-6161 x113

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

---

**From:** Cliff Brunson [mailto:[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)]  
**Sent:** Thursday, March 23, 2017 6:50 PM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; Shelly Tucker <[stucker@blm.gov](mailto:stucker@blm.gov)>  
**Cc:** Becky Haskell <[rhaskell@concho.com](mailto:rhaskell@concho.com)>; Ken Swinney <[kswinney@bbcinternational.com](mailto:kswinney@bbcinternational.com)>; Jennifer Gilkey <[jgilkey@bbcinternational.com](mailto:jgilkey@bbcinternational.com)>; Kathy Purvis <[kathy@bbcinternational.com](mailto:kathy@bbcinternational.com)>  
**Subject:** COG - Spruce Goose Fed Com #2H & #3H (1RP-4565) - Delineation Workplan

Olivia and Shelly,

Please find the attached Delineation Workplan and remediation proposal for the COG Spruce Goose Fed Com #2H & #3H (1RP-4565). COG is requesting that you review this plan and is looking forward to the OCD's and BLM's approval.

If you have any questions, please let me know.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS  
 President  
 BBC International, Inc.  
 World-Wide Environmental Specialists  
 Mailing Address:  
 P. O. Box 805  
 Hobbs, NM 88241-0805 USA  
 Shipping Address:  
 1324 W. Marland St.  
 Hobbs, NM 88240 USA  
 Phone: (575) 397-6388  
 Fax: (575) 397-0397  
 E-Mail: [cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)



\*\*\*\*\*

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\*\*\*\*\*

**From:** Price, Henryetta  
**To:** [Cliff Brunson](#)  
**Cc:** [Becky Haskell](#); [Ken Swinney](#); [Jennifer Gilkey](#); [Kathy Purvis](#); [Yu, Olivia, EMNRD](#)  
**Subject:** Re: FW: COG Spruce Goose Fed Com #2H - Delineation Workplan  
**Date:** Monday, September 18, 2017 3:35:55 PM

---

Hey Cliff,

Quite honestly, the amount of chlorides at on the caliche pad is not going to impact anything. If you can leave in place and address issues at closure, BLM is good with that. You will need concurrence from NMOCD. If not, then work plan is approved as written.

If the topsoil stockpile is still present it will need to be knocked down and spread around the reclaimed area or where reclamation can be achieved at this location. Please let me know if I need to convey this to Rebecca instead. Thanks.

Also, do not include Shelly on work plans after spills are assigned to Art Arias or myself. Otherwise I get duplicate copies or Shelly gets them and assumes they are hers and approves them. We basically get a lot of miscommunication. I apologize for the delay as well.

## Henryetta Price

Environmental Protection Specialist  
Bureau Of Land Management  
[Hprice@blm.gov](mailto:Hprice@blm.gov)  
Phone 575-234-5951  
Cell 575-706-2780  
Fax 575-234-5927

\* Tis the season for African Rue. Please do a 360 scan around your well locations and lease roads.

On Mon, Sep 18, 2017 at 2:57 PM, Cliff Brunson <[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)> wrote:

Henryetta,

Yes, I had sent a plan back in April to Olivia and Shelly and Olivia approved it. I didn't know you were handling this site at the time and I guess Shelly didn't forward it to you. I have attached the emails associated with this site. If you would also approve this one as well, it would be greatly appreciated.

My apologies for the confusion.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS

President

BBC International, Inc.

World-Wide Environmental Specialists

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\*\*\*\*\*

**From:** Price, Henryetta [mailto:[hprice@blm.gov](mailto:hprice@blm.gov)]

**Sent:** Monday, September 18, 2017 2:35 PM

**To:** Cliff Brunson <[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)>

**Cc:** Shelly Tucker <[stucker@blm.gov](mailto:stucker@blm.gov)>; Becky Haskell <[rhaskell@concho.com](mailto:rhaskell@concho.com)>; Ken Swinney <[kswinney@bbcinternational.com](mailto:kswinney@bbcinternational.com)>; Jennifer Gilkey <[jgilkey@bbcinternational.com](mailto:jgilkey@bbcinternational.com)>; Kathy Purvis <[kathy@bbcinternational.com](mailto:kathy@bbcinternational.com)>

**Subject:** Re: FW: COG Spruce Goose Fed Com #2H - Delineation Workplan

Cliff,

Did you do the one for the Facility as well and do you need approval? I didn't get the initial notification so I ignored the delineation plan assuming Shelly was still tracking this spill and not I.

**Henryetta Price**

Environmental Protection Specialist

Bureau Of Land Management

[Hprice@blm.gov](mailto:Hprice@blm.gov)

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Cell 575-706-2780

Fax 575-234-5927

\* Tis the season for African Rue. Please do a 360 scan around your well locations and lease roads.

On Mon, Sep 18, 2017 at 2:20 PM, Cliff Brunson <[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)> wrote:

Thank you....

Cliff P. Brunson, CEI, CRS

President

BBC International, Inc.

World-Wide Environmental Specialists

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\*\*\*\*\*

**From:** Price, Henryetta [mailto:[hprice@blm.gov](mailto:hprice@blm.gov)]  
**Sent:** Monday, September 18, 2017 2:19 PM  
**To:** Cliff Brunson <[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)>  
**Cc:** Shelly Tucker <[stucker@blm.gov](mailto:stucker@blm.gov)>; Becky Haskell <[rhaskell@concho.com](mailto:rhaskell@concho.com)>; Ken Swinney <[kswinney@bbcinternational.com](mailto:kswinney@bbcinternational.com)>; Jennifer Gilkey <[jgilkey@bbcinternational.com](mailto:jgilkey@bbcinternational.com)>; Kathy Purvis <[kathy@bbcinternational.com](mailto:kathy@bbcinternational.com)>  
**Subject:** Re: FW: COG Spruce Goose Fed Com #2H - Delineation Workplan

Approved

**Henryetta Price**

Environmental Protection Specialist

Bureau Of Land Management

[Hprice@blm.gov](mailto:Hprice@blm.gov)

Phone 575-234-5951

Cell 575-706-2780

Fax 575-234-5927

\* Tis the season for African Rue. Please do a 360 scan around your well locations and lease roads.

On Mon, Sep 18, 2017 at 1:43 PM, Cliff Brunson <[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)> wrote:

Henryetta,

I was checking on the status of this site. Mike Bratcher of the OCD approved it on April 6<sup>th</sup> and I sent it to you on April 14<sup>th</sup> and haven't heard anything. Would you let us know if the BLM approves this so COG can move forward.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS

President

BBC International, Inc.

World-Wide Environmental Specialists

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E-Mail: [cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)



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\*\*\*\*\*

**From:** Cliff Brunson [mailto:[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)]  
**Sent:** Friday, April 14, 2017 4:19 PM  
**To:** 'Tucker, Shelly' <[stucker@blm.gov](mailto:stucker@blm.gov)>  
**Cc:** 'Henryetta Price' <[hprice@blm.gov](mailto:hprice@blm.gov)>; Becky Haskell <[rhaskell@concho.com](mailto:rhaskell@concho.com)>  
**Subject:** RE: COG Spruce Goose Fed Com #2H - Delineation Workplan

Attached is the workplan that Mike approved.

Cliff P. Brunson, CEI, CRS

President

BBC International, Inc.

World-Wide Environmental Specialists

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Hobbs, NM 88241-0805 USA

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\*\*\*\*\*

**From:** Tucker, Shelly [<mailto:stucker@blm.gov>]  
**Sent:** Friday, April 14, 2017 4:17 PM  
**To:** Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Cc:** Cliff Brunson <[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)>; Becky Haskell <[rhaskell@concho.com](mailto:rhaskell@concho.com)>; Ken Swinney <[kswinney@bbcinternational.com](mailto:kswinney@bbcinternational.com)>; Jennifer Gilkey <[jgilkey@bbcinternational.com](mailto:jgilkey@bbcinternational.com)>; Kathy Purvis <[kathy@bbcinternational.com](mailto:kathy@bbcinternational.com)>; Henryetta Price <[hprice@blm.gov](mailto:hprice@blm.gov)>  
**Subject:** Re: COG Spruce Goose Fed Com #2H - Delineation Workplan

Thank you. Henryetta Price will be the authorized officer for this release.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

*Shelly J Tucker*

Environmental Protection Specialist

O&G Spill/Release Coordinator

Bureau of Land Management

620 E. Greene St

Carlsbad, NM 88220

575.234.5905 - Direct

575.361.0084 - Cellular

575.234.6235 - Emergency Spill Number

[stucker@blm.gov](mailto:stucker@blm.gov)

The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. In such an event that the location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until the contaminant issues are fully mitigated and the location is successfully reclaimed. In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

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On Thu, Apr 6, 2017 at 11:52 AM, Bratcher, Mike, EMNRD  
<[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)> wrote:

RE: COG \* Spruce Goose Fed 2H \* 2RP-4082 \* DOR: 1/17/17

Cliff,

Your proposal for remediation of the above referenced release is approved. Please advise once remedial activities have been scheduled. Federal sites will require like approval from BLM.

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

If you have any questions or concerns, and for notification, please contact me.

Mike Bratcher

NMOCD District 2

811 S. First St.

Artesia NM 88210

575-748-1283 Ext 108

[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)

---

**From:** Cliff Brunson [mailto:[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)]

**Sent:** Wednesday, March 29, 2017 2:49 PM

**To:** Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

**Cc:** Becky Haskell <[rhaskell@concho.com](mailto:rhaskell@concho.com)>; Ken Swinney  
<[kswinney@bbcinternational.com](mailto:kswinney@bbcinternational.com)>; Jennifer Gilkey

<[jgilkey@bbcinternational.com](mailto:jgilkey@bbcinternational.com)>; Kathy Purvis <[kathy@bbcinternational.com](mailto:kathy@bbcinternational.com)>

**Subject:** COG Spruce Goose Fed Com #2H - Delineation Workplan

Mike,

I have attached a Delineation and remediation packet for the COG Spruce Goose Fed Com #2H that I told you I would send. If you would please review and give me a call to discuss if needed. If this meets with your approval, a return email approving the remediation would be greatly appreciated.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS

President

BBC International, Inc.

World-Wide Environmental Specialists

Mailing Address:

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Hobbs, NM 88241-0805 USA

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E-Mail: [cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)



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----- Forwarded message -----

From: Cliff Brunson <[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)>

To: Olivia Yu <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>, Shelly Tucker <[stucker@blm.gov](mailto:stucker@blm.gov)>

Cc: Becky Haskell <[rhaskell@concho.com](mailto:rhaskell@concho.com)>, Ken Swinney <[kswinney@bbcinternational.com](mailto:kswinney@bbcinternational.com)>, Jennifer Gilkey <[jgilkey@bbcinternational.com](mailto:jgilkey@bbcinternational.com)>, Kathy Purvis <[kathy@bbcinternational.com](mailto:kathy@bbcinternational.com)>

Bcc:

Date: Thu, 23 Mar 2017 18:50:05 -0600

Subject: COG - Spruce Goose Fed Com #2H & #3H (1RP-4565) - Delineation Workplan

Olivia and Shelly,

Please find the attached Delineation Workplan and remediation proposal for the COG Spruce Goose Fed Com #2H & #3H (1RP-4565). COG is requesting that you review this plan and is looking forward to the OCD's and BLM's approval.

If you have any questions, please let me know.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS

President

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From: "Yu, Olivia, EMNRD" <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>  
To: Cliff Brunson <[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)>, Shelly Tucker <[stucker@blm.gov](mailto:stucker@blm.gov)>  
Cc: Becky Haskell <[rhaskell@concho.com](mailto:rhaskell@concho.com)>, Ken Swinney <[kswinney@bbcinternational.com](mailto:kswinney@bbcinternational.com)>, Jennifer Gilkey <[jgilkey@bbcinternational.com](mailto:jgilkey@bbcinternational.com)>, Kathy Purvis <[kathy@bbcinternational.com](mailto:kathy@bbcinternational.com)>  
Bcc:  
Date: Wed, 12 Apr 2017 13:59:11 -0600  
Subject: RE: COG - Spruce Goose Fed Com #2H & #3H (1RP-4565) - Delineation Workplan

Dear Mr. Brunson:

The delineation workplan for 1RP-4565 is approved as written. Please see the attachment for your records.

Thanks,

Olivia Yu

Environmental Specialist

NMOCD, District I

[Olivia.yu@state.nm.us](mailto:Olivia.yu@state.nm.us)

575-393-6161 x113

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**From:** Cliff Brunson [mailto:[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)]  
**Sent:** Thursday, March 23, 2017 6:50 PM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; Shelly Tucker <[stucker@blm.gov](mailto:stucker@blm.gov)>  
**Cc:** Becky Haskell <[rhaskell@concho.com](mailto:rhaskell@concho.com)>; Ken Swinney <[kswinney@bbcinternational.com](mailto:kswinney@bbcinternational.com)>; Jennifer Gilkey <[jgilkey@bbcinternational.com](mailto:jgilkey@bbcinternational.com)>; Kathy Purvis <[kathy@bbcinternational.com](mailto:kathy@bbcinternational.com)>  
**Subject:** COG - Spruce Goose Fed Com #2H & #3H (1RP-4565) - Delineation Workplan

Olivia and Shelly,

Please find the attached Delineation Workplan and remediation proposal for the COG Spruce Goose Fed Com #2H & #3H (1RP-4565). COG is requesting that you review this plan and is looking forward to the OCD's and BLM's approval.

If you have any questions, please let me know.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS

President

BBC International, Inc.

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 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 157745

**CONDITIONS**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 157745
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

**CONDITIONS**

Created By	Condition	Condition Date
amaxwell	None	11/10/2022