



[Dakota Neel]
[HSE Coordinator]

June 8th 2018

Mike Bratcher
Oil Conservation Division
District 2 – Artesia
811 South First Street.
Artesia, NM 88210

Henryetta Price
Bureau of Land Management
Field Operations Division
620 E. Greene St
Carlsbad, NM 88220

**Re: Closure Report
Copperhead 31 Federal Com #1H
API #: 30-015-38532
RP#: 2RP-4276 & 2RP-4277
Unit Letter G Section 30, Township 26S, Range 29E
Eddy County, NM**

Mr. Bratcher/Ms. Price,

COG Operating, LLC (COG) is pleased to submit for your consideration the following closure report for the Copperhead 31 Federal Com #1H. This closure report is in reference to releases that occurred on June 26, 2017 and June 27, 2017. A work plan was submitted to the New Mexico Oil Conservation Division (NMOCD) and the Bureau of Land Management (BLM) on September 25, 2017. On October 10, 2017 the NMOCD approved of the workplan with COA's. On April 12, 2018 COG requested that a liner be installed at 4' in lieu of the COA's requested by the NMOCD. Following this request NMOCD approved the revision on April 13, 2018 and the BLM approved the revision on April 24, 2018.

BACKGROUND

The first release was discovered on June 26, 2017, and released approximately ten (10) barrels of produced water due to a power loss at the Schmitt SWD, causing the flow line to pressure up and split. None of the fluids were recovered from the release. The second release overlapped the footprint of the first release and occurred the following day on June 27, 2017, due to a weld failure on the flowline that was recently repaired. The second spill released approximately fifty (50) barrels of produced water and none was recovered.

June 8, 2018

REMEDIAL ACTIONS

- The entire impacted area was excavated to 4' BGS and a liner was installed.
- All of the excavated material was hauled to an NMOCD approved solid waste disposal facility.
- The excavation was backfilled with like material and contoured to match the surrounding location.

Based on the information provided, COG Operating LLC, would like to request closure of the RP numbers 2RP-4276 & 2RP-4277 associated with this release. Please feel free to contact me with any questions or concerns at (432) 215-2783.

Sincerely,



Dakota Neel
HSE Coordinator
Dneel2@concho.com

Enclosed:

- 1) C-141 Initial (Copy)
- 2) C-141 Final

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

Form C-141
Revised August 8, 2011

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

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company: COG Operating LLC OGRID # 229137	Contact: Robert McNeill
Address: 600 West Illinois Avenue, Midland TX 79701	Telephone No. 432-683-7443
Facility Name: Copperhead 31 Federal Com #001H	Facility Type: Flowline
Surface Owner: Private	Mineral Owner: Federal
API No. 30-015-38532	

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
G	30	26S	29E	1980	North	1980	East	Eddy

Latitude 32.015107 Longitude -104.022121

NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: 10 bbl.	Volume Recovered: 0 bbl.
Source of Release: Poly Flowline	Date and Hour of Occurrence: June 26, 2017 3:00 pm	Date and Hour of Discovery: June 26, 2017 3:00 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 due to a power loss resulting in the Schmitt SWD shutting in. The line pressured up and split. The section of flowline that failed was cut and the line was fused back together.

Describe Area Affected and Cleanup Action Taken.*

The release was within the pasture. A vacuum truck was dispatched to remove all freestanding fluids. The remediation of this site was completed according to the work plan approved by the BLM and NMOCD.

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: 	OIL CONSERVATION DIVISION	
	Approved by Environmental Specialist:	
Printed Name: Dakota Neel	Approval Date:	Expiration Date:
Title: HSE Coordinator	Conditions of Approval:	
E-mail Address: dneel2@concho.com	Attached <input type="checkbox"/>	
Date: June 8, 2018 Phone: 575-746-2010		

* Attach Additional Sheets If Necessary

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NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: 50 bbl.	Volume Recovered: 0 bbl.
Source of Release: Poly Flowline	Date and Hour of Occurrence: June 27, 2017 1:30 pm	Date and Hour of Discovery: June 27, 2017 1:30 pm
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Ms. Weaver – NMOCD / Ms. Tucker – BLM	
By Whom? Rebecca Haskell	Date and Hour: June 27, 2017 3:47 pm	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

The release was due to a failure in a fuse in the polyline which was recently repaired. The fuse was repaired.

Describe Area Affected and Cleanup Action Taken.*

The release was within the pasture. A vacuum truck was dispatched to remove all freestanding fluids. The remediation of this site was completed according to the work plan approved by the BLM and NMOCD.

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E-mail Address: dneel2@concho.com	Attached <input type="checkbox"/>	
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Describe Area Affected and Cleanup Action Taken.*		
The release was within the pasture. A vacuum truck was dispatched to remove all freestanding fluids. Concho will have the spill area sampled to delineate any possible impact from the release and we will present a remediation work plan to the NMOCD for approval prior to any significant 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 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:	OIL CONSERVATION DIVISION	
Printed Name: Rebecca Haskell	Approved by Environmental Specialist:	
Title: Senior HSE Coordinator	Approval Date:	Expiration Date:
E-mail Address: rhaskell@concho.com	Conditions of Approval:	
Date: June 29, 2017 Phone: 432-683-7443	Attached <input type="checkbox"/>	

* Attach Additional Sheets If Necessary

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Signature:	OIL CONSERVATION DIVISION		
Printed Name: Rebecca Haskell	Approved by Environmental Specialist:		
Title: Senior HSE Coordinator	Approval Date:	Expiration Date:	
E-mail Address: rhaskell@concho.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: June 29, 2017 Phone: 432-683-7443			

* Attach Additional Sheets If Necessary

Lull, Christian

Subject: FW: [EXTERNAL] FW: COG - Copperhead 31 Fed Com #1H (2RP-4276 & 2RP-4277)

From: Rebecca Haskell <RHaskell@concho.com>

Sent: Tuesday, April 24, 2018 12:27 PM

To: DeAnn Grant <agrants@concho.com>

Subject: FW: [EXTERNAL] FW: COG - Copperhead 31 Fed Com #1H (2RP-4276 & 2RP-4277)

Becky Haskell
Senior HSE Coordinator
COG Operating LLC
600 W Illinois Avenue | Midland, TX 79701
Direct: 432-818-2372 | Main: 432.683.7443
Cell: 432-556-5130
rhaskell@concho.com



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From: Price, Henryetta [<mailto:hprice@blm.gov>]

Sent: Tuesday, April 24, 2018 1:15 PM

To: Bratcher, Mike, EMNRD

Cc: Tucker, Shelly; Dakota Neel; Rebecca Haskell

Subject: Re: [EXTERNAL] FW: COG - Copperhead 31 Fed Com #1H (2RP-4276 & 2RP-4277)

BLM concurs with NMOCD'S approval for this location.

Henryetta Price

Environmental Protection Specialist
Bureau Of Land Management

Hprice@blm.gov

Phone 575-234-5951

Cell 575-706-2780

Fax 575-234-5927

*** Lesser Prairie Chicken (LPC) timing stipulations are in effect 1 Mar- 15 June annually.

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

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 Fri, Apr 13, 2018 at 7:55 AM, Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us> wrote:

RE: COG * Copperhead 31 Fed Com 1H * 2RP-4276 & 2RP-4277

Henryetta & Shelly,

OCD has approved a revision to the original approval. A liner will be installed at 4' bgs in lieu of the deeper excavation. Please advise if BLM does not concur.

Thank you,

Mike Bratcher

NMOCD District 2

811 South First Street

Artesia, NM 88210

575-748-1283 Ext 108

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: Dakota Neel <DNeel2@concho.com>
Sent: Thursday, April 12, 2018 1:07 PM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: Rebecca Haskell <RHaskell@concho.com>
Subject: RE: COG - Copperhead 31 Fed Com #1H (2RP-4276 & 2RP-4277)

Mr. Bratcher,

Would it be possible to meet with you tomorrow to discuss the approved work plan for 2RP-4276 and 2RP-42767?

You approved this site with the condition that we dig out the area of T1 to 6' BGS, T2 to 4' BGS and T3 to 3' BGS. I would like to discuss with you the possibility of installing a liner instead of excavating to the requested depths.

I am available anytime tomorrow to meet.

Please let me know what works best for you.

Thanks,

Dakota Neel

HSE Coordinator

COG Operating LLC

Cell: [432-215-2783](tel:432-215-2783)

dneel2@concho.com

2407 Pecos Ave.

Artesia , NM 88210



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From: Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]
Sent: Tuesday, October 10, 2017 8:47 AM
To: Gonzales, Clair; Carmona, Mike; Weaver, Crystal, EMNRD; Henryetta Price
Cc: Rebecca Haskell; Tavarez, Ike; Robert McNeill; Dakota Neel; Aaron Lieb
Subject: [External] RE: COG - Copperhead 31 Fed Com #1H (2RP-4276 & 2RP-4277)

RE: COG * Copperhead 31 Fed Com 1H * 2RP-4276 & 2RP-4277 * DOR: 6/26 & 27/17

Greetings,

Your proposal for remediation of the above referenced site is approved with the following:

The NMOCD Environmental Bureau has requested District staff to initiate RRAL for chloride delineation/remediation to 600 mg/kg. With that, OCD requests T-1 be excavated to 6', T-2 to 4', and T-3 to 3'. Please notify OCD in the event excavation depths are not achieved. Federal sites will require like approval from BLM. Please advise once remedial activities have been scheduled.

If you have any questions or concerns, please contact me or Jim Griswold, NMOCD Environmental Bureau Chief.

Mike Bratcher

NMOCD District 2

811 South First Street

Artesia, NM 88210

575-748-1283 Ext 108

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: Gonzales, Clair [<mailto:Clair.Gonzales@tetrattech.com>]
Sent: Monday, September 25, 2017 10:07 AM
To: Carmona, Mike <Mike.Carmona@tetrattech.com>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: Rebecca Haskell <RHaskell@concho.com>; Tavarez, Ike <Ike.Tavarez@tetrattech.com>; Robert McNeill <RMcNeill@concho.com>; Dakota Neel <DNeel2@concho.com>; Aaron Lieb <ALieb@concho.com>
Subject: [External] COG - Copperhead 31 Fed Com #1H (2RP-4276 & 2RP-4277)

**** External email. Use caution. ****

Good Morning,

Attached is the work plan for the above referenced site located in Eddy County, New Mexico. Once approved, COG will implement the proposed work plan. Let me know if you have any questions or concerns.

Thank you,

Clair Gonzales

Clair Gonzales | Geologist III

Phone: 432.687.8123 | Mobile 432.260.8634 | Fax:432.682.3946

clair.gonzales@tetrattech.com

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District I
 1625 N. French Dr., Hobbs, NM 88240
 Phone:(575) 393-6161 Fax:(575) 393-0720

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 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 178306

CONDITIONS

Operator: COG PRODUCTION, LLC 600 W. Illinois Ave Midland, TX 79701	OGRID: 217955
	Action Number: 178306
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

Created By	Condition	Condition Date
bhall	None	1/23/2023