

Bratcher, Mike, EMNRD

From: Tavarez, Ike <Ike.Tavarez@tetrattech.com>
Sent: Tuesday, July 16, 2013 1:38 PM
To: Bratcher, Mike, EMNRD
Cc: Joshua Russo; Robert Grubbs; Pat Ellis (PEllis@concho.com); Michelle Mullins (MMullins@concho.com)
Subject: COG - F.M. Robertson #1 Tank Battery - Approval Request
Attachments: COG -F.M. Robertson 1 Tank Battery - Work Plan .pdf

Mike,

Please find the enclosed Work Plan for the above reference spill site located in Eddy County, New Mexico. The spill has been assessed and the remedial recommendations are included in the work plan. I will mail you a hard copy of the work plan for your files. Once approved, Tetra Tech will schedule the soil remediation and notify you prior to implementing the work plan. Please let me know if you need additional information or call me if you have any questions

Ike Tavarez, PG | Senior Project Manager

Main: 432.682.4559 | Fax: 432.682.3946 | Cell: 432.425.3878

Ike.Tavarez@tetrattech.com

Tetra Tech | Complex World, Clear Solutions™

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Partial print

SITE INFORMATION

Report Type: Work Plan

General Site Information:					
Site:	F.M. Robinson #1 Tank Battery				
Company:	COG Operating LLC				
Section, Township and Range	Unit E	Sec 27	T17S	R29E	
Lease Number:	API-30-015-22037				
County:	Eddy County				
GPS:	32.80775° N			104.06894° W	
Surface Owner:	State				
Mineral Owner:					
Directions:	In Loco Hills at the intersection of CR 217 and Hwy 82. Travel west on Hwy 82 for 5.1 miles, turn left (south) on CR 212 and travel 0.7 mile, turn left (east) and travel 0.1 mile to the site.				

Release Data:	
Date Released:	1/31/2013
Type Release:	Oil and Produced Water
Source of Contamination:	Produced Water Tank
Fluid Released:	210 bbls
Fluids Recovered:	205 bbls

Official Communication:		
Name:	Pat Ellis	Ike Tavaréz
Company:	COG Operating, LLC	Tetra Tech
Address:	One Concho Center 600 W. Illinois Ave.	1910 N. Big Spring
City:	Midland Texas, 79701	Midland, Texas
Phone number:	(432) 686-3023	(432) 682-4559
Fax:	(432) 684-7137	(432) 682-3946
Email:	pellis@conchoresources.com	ike.tavarez@tetrattech.com

Ranking Criteria		
Depth to Groundwater:	Ranking Score	Site Data
<50 ft	20	
50-99 ft	10	
>100 ft	0	0
Wellhead Protection:	Ranking Score	Site Data
Water Source <1,000 ft., Private <200 ft.	20	
Water Source >1,000 ft., Private >200 ft.	0	0
Surface Body of Water:	Ranking Score	Site Data
<200 ft.	20	
200 ft - 1,000 ft.	10	
>1,000 ft.	0	0
Total Ranking Score:		0

Acceptable Soil RRAL (mg/kg)		
Benzene	Total BTEX	TPH
10	50	5,000



July 16, 2013

Mr. Mike Bratcher
Environmental Engineer Specialist
Oil Conservation Division, District 2
811 S. First Street
Artesia, New Mexico 88210

Re: Work Plan for the COG Operating LLC., F.M. Robinson #1 Tank Battery, Unit E, Section 27, Township 17 South, Range 29 East, Eddy County, New Mexico.

Mr. Bratcher:

Tetra Tech, Inc. (Tetra Tech) was contacted by COG Operating LLC. (COG) to assess a spill from the F.M. Robinson #1 Tank Battery located in Unit E, Section 27, Township 17 South, Range 29 East, Eddy County, New Mexico (Site). The spill site coordinates are N 32.80775°, W 104.06894°. The site location is shown on Figures 1 and 2.

Background

According to the State of New Mexico C-141 Initial Report, the leak was discovered on January 31, 2013, and released approximately two hundred and ten (210) barrels of produced fluid from a produced water tank overflow. To alleviate the problem, COG personnel restored power to the facility. Two hundred and five (205) barrels of standing fluids were recovered. The spill initiated inside the lined facility and breached the firewalls affecting an area approximately 70' X 120' and 25' x 25' on the pad. The release migrate east off the pad into the pasture affecting an area approximately 10' x 50', 50' x 70', 10' x 35' and 15' x 15'. The initial C-141 form is enclosed in Appendix A.

Groundwater

No water wells were listed within Section 27. According to the NMOCD groundwater map, the average depth to groundwater in this area is approximately 125' below surface. The groundwater data is shown in Appendix B.



Regulatory

A risk-based evaluation was performed for the Site in accordance with the New Mexico Oil Conservation Division (NMOCD) Guidelines for Remediation of Leaks, Spills and Releases, dated August 13, 1993. The guidelines require a risk-based evaluation of the site to determine recommended remedial action levels (RRAL) for benzene, toluene, ethylbenzene and xylene (collectively referred to as BTEX) and total petroleum hydrocarbons (TPH) in soil. The proposed RRAL for benzene was determined to be 10 parts per million (ppm) or milligrams per kilogram (mg/kg) and 50 ppm for total BTEX (sum of benzene, toluene, ethylbenzene, and xylene). Based upon the depth to groundwater, the proposed RRAL for TPH is 5,000 mg/kg.

Soil Assessment and Analytical Results

On February 13, 2013, Tetra Tech personnel inspected and sampled the spill area. Twelve (12) auger holes (AH-1 through AH-12) were installed using a stainless steel hand auger to assess the impacted soils. Selected samples were analyzed for TPH analysis by EPA method 8015 modified, BTEX by EPA Method 8021B and chloride by EPA method 300.0. Copies of laboratory analysis and chain-of-custody documentation are included in Appendix C. The sampling results are summarized in Table 1. The auger hole locations are shown on Figure 3.

Referring to Table 1, none of the auger hole samples exceeded the TPH RRAL. Auger hole (AH-12) exceeded the RRAL for total BTEX at 0-1', but declined below the RRAL of 24.7 mg/kg.

Chloride concentrations were detected in majority of the auger holes. Auger holes (AH-8 and AH-11) did not show a significant chloride impact to the areas. A shallow chloride impact (0-1') was detected in the areas of AH-2, AH-3, AH-4 and AH-10, which declined at 1-1.5' below surface. A deeper impact was encountered in the areas of AH-1 and AH-5, but declined with depth at 3-3.5' to 82.5 mg/kg and 589 mg/kg, respectively. The area of AH-1 did show a chloride spike at 8-8.5' and 9-9.5'. The remaining areas of were not vertically defined showing bottom auger hole samples of 5,220 mg/kg (AH-6), 2,500 mg/kg (AH-7) and 3,830 mg/kg (AH-9) at 7.0' below surface.

On April 30, 2013, Tetra Tech supervised the installation of four (4) soil borings (SB-1 through SB-4) using an air rotary drilling rig to define the chloride extents in the areas of AH-1, AH-6, AH-7 and AH-9. The soil borings were installed to approximate depths of 40.0' to 50.0' below surface. The soil boring locations are shown on Figure 3. Copies of the laboratory analysis chain-of-custody documentation are included in Appendix C. The soil boring results are summarized in Table 1.



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Referring to Table 1, SB-1 (AH-1) was installed to define the chloride spike detected at 8.0' to 9.0' below surface. Soil boring (SB-1) showed a spike of 9-10' and declined to 150 mg/kg at 14-15' below surface. SB-2 (AH-6) did detect elevated chlorides from surface to a depth of approximately 30.0' below surface, which significantly declined to 1,300 mg/kg at 39-40' and 356 mg/kg at 49-50' below surface. Soil borings SB-3 (AH-7) and SB-4 (AH-9) showed vertical delineation and declined below 1,000 mg/kg chlorides at 24-25' below surface.

Work Plan

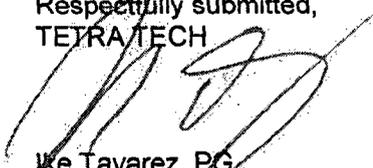
COG proposes to remove the impacted material as highlighted (green) in Table 1 and shown on Figure 4. In the areas of AH-2, AH-3, AH-4, AH-5, AH-10 and AH-12 will be excavated to a depth of approximately 1.0' below surface. The area of AH-1 (SB-1) will be excavated to a depth of 2.0' to 3.0' below surface. Due to the proximity of the facility, lines and tanks, the area of AH-6 (SB-2) on the pad will be excavated to an approximate depth of 3.0' to 4.0' and capped either clay or 40 mil liner for safety concerns.

In the areas of AH-7 (SB-3) and AH-9 (SB-4), the proposed excavation will range from 4.0' to 5.0' below surface. A COG water line is located in the area of AH-9 and performing deeper excavation is a safety concern excavating near the active line. Once excavated to the appropriate depth, the areas will be capped with a 40 mil liner at 4.0' below surface. The material will be hauled off for proper disposal and the excavation will be backfilled with clean soil to surface grade.

The proposed excavation depths may not be reached due to wall cave ins and safety concerns for onsite personnel. In addition, impacted soil around oil and gas equipment, structures or lines may not be feasible or practicable to be removed due to safety concerns. As such, Tetra Tech will excavate the soils to the maximum extent practicable.

Upon completion, a final report will be submitted to the NMOCD. If you have any questions or comments concerning the assessment or the proposed remediation activities for this site, please call me at (432) 682-4559.

Respectfully submitted,
TETRA TECH



Mike Tavaraz, PG
Project Manager

cc: Pat Ellis – COG

PASTURE

PASTURE

LINED FACILITY

TELEPHONE POLE

TELEPHONE POLE

PAD

WELL

CO-BURIED WATER LINE

DCP-BURIED LINE

750 BBL WATER

500 BBL WATER

500 BBL WATER

AH-1

AH-2

AH-7

AH-3

AH-4

AH-9

AH-5

AH-9

AH-10

AH-11

AH-12

SB-1

SB-2

SB-3

SB-4

120'

70'

25'

50'

145'

50'

35'

10'

40'

115'

15'

15'

15'



EXPLANATION

- ⊙ AUGER HOLE SAMPLE LOCATIONS
- ⊙ SOIL BORING SAMPLE LOCATIONS
- ▨ SPILL AREA



Figure 3

F.M. Robinson #001

Spill Assessment Map

Eddy County, New Mexico

Project: 112C05054

Date: 5/29/2013

File: H:\GIS\VC05054



SCALE: 1" = 35 FEET

0 20 40 Feet

PASTURE

AH-6
SB-2

LINED FACILITY

3' - 4' DEEP W/ LINER

PASTURE

4' - 5' DEEP W/ LINER

4' - 5' DEEP W/ LINER

PAD

2' - 3' DEEP

1' DEEP

1' DEEP

SCRAPE TO 1' DEEP

1' DEEP

PUMP JACK

PASTURE

EXPLANATION

- ⊙ AUGER HOLE SAMPLE LOCATIONS
- ⊙ SOIL BORING SAMPLE LOCATIONS
- ▭ PROPOSED LINER
- ▨ PROPOSED EXCAVATION AREAS



Figure 4

F.M. Robinson #001

Proposed Excavation Areas & Depths Map

Eddy County, New Mexico

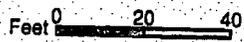
Project : 112C05054

Date : 5/29/2013

File : H:\GIS\CD05054



SCALE: 1 IN = 42 FEET



Drawn By: Isabel Marmolejo

Table 1
COG Operating LLC.
F.M. Robinson #1 Tank Battery
Eddy County, New Mexico

Sample ID	Sample Date	Sample Depth (ft)	Soil Status		TPH (mg/kg)			Benzene (mg/kg)	Toluene (mg/kg)	Ethlybenzene (mg/kg)	Xylene (mg/kg)	Total BTEX (mg/kg)	Chloride (mg/kg)
			In-Situ	Removed	GRO	DRO	Total						
AH-1	2/13/2013	0-1	X		5.46	<50.0	5.46	<0.0200	<0.0200	<0.0200	<0.0200	<0.0200	6,650
	"	1-1.5	X		-	-	-	-	-	-	-	-	3,770
	"	2-2.5	X		-	-	-	-	-	-	-	-	2,250
	"	3-3.5	X		-	-	-	-	-	-	-	-	82.6
	"	4-4.5	X		-	-	-	-	-	-	-	-	82.6
	"	5-5.5	X		-	-	-	-	-	-	-	-	48.6
	"	6-6.5	X		-	-	-	-	-	-	-	-	287
	"	7-7.5	X		-	-	-	-	-	-	-	-	845
	"	8-8.5	X		-	-	-	-	-	-	-	-	1,660
		9-9.5	X		-	-	-	-	-	-	-	-	1,700
SB-1	4/29/2013	0-1	X		-	-	-	-	-	-	-	-	1,840
	"	2-3	X		-	-	-	-	-	-	-	-	3,470
	"	4-5	X		-	-	-	-	-	-	-	-	726
	"	6-7	X		-	-	-	-	-	-	-	-	792
	"	9-10	X		-	-	-	-	-	-	-	-	1,030
	"	14-15	X		-	-	-	-	-	-	-	-	150
	"	19-20	X		-	-	-	-	-	-	-	-	170
	"	24-25	X		-	-	-	-	-	-	-	-	184
AH-2	2/13/2013	0-1	X		71.8	453	525	<0.0400	<0.0400	<0.0400	0.256	0.256	1,260
	"	1-1.5	X		-	-	-	-	-	-	-	-	379
	"	2-2.5	X		-	-	-	-	-	-	-	-	818
	"	3-3.5	X		-	-	-	-	-	-	-	-	639
	"	4-4.5	X		-	-	-	-	-	-	-	-	459
	"	5-5.5	X		-	-	-	-	-	-	-	-	409
	"	6-6.5	X		-	-	-	-	-	-	-	-	245
	"	7-7.5	X		-	-	-	-	-	-	-	-	463
	"	8-8.5	X		-	-	-	-	-	-	-	-	399
		9-9.5	X		-	-	-	-	-	-	-	302	



Table 1
COG Operating LLC.
F.M. Robinson #1 Tank Battery
Eddy County, New Mexico

Sample ID	Sample Date	Sample Depth (ft)	Soil Status		TPH (mg/kg)			Benzene (mg/kg)	Toluene (mg/kg)	Ethlybenzene (mg/kg)	Xylene (mg/kg)	Total BTEX (mg/kg)	Chloride (mg/kg)
			In-Situ	Removed	GRO	DRO	Total						
AH-3	2/13/2013	0-1	X		<4.00	<50.0	<50.0	<0.0200	<0.0200	<0.0200	<0.0200	<0.0200	1,800
	"	1-1.5	X		-	-	-	-	-	-	-	-	524
	"	2-2.5	X		-	-	-	-	-	-	-	-	519
	"	3-3.5	X		-	-	-	-	-	-	-	-	1,030
	"	4-4.5	X		-	-	-	-	-	-	-	-	1,040
	"	5-5.5	X		-	-	-	-	-	-	-	-	1,020
	"	6-6.5	X		-	-	-	-	-	-	-	-	520
	"	7-7.5	X		-	-	-	-	-	-	-	-	303
	"	8-8.5	X		-	-	-	-	-	-	-	-	243
		9-9.5	X		-	-	-	-	-	-	-	-	263
AH-4	2/13/2013	0-1	X		<80.0	2,800	2,800	<0.400	<0.400	<0.400	<0.400	<0.400	1,530
	"	1-1.5	X		-	-	-	-	-	-	-	-	450
	"	2-2.5	X		-	-	-	-	-	-	-	-	692
	"	3-3.5	X		-	-	-	-	-	-	-	-	477
	"	4-4.5	X		-	-	-	-	-	-	-	-	391
	"	5-5.5	X		-	-	-	-	-	-	-	-	66.0
	"	6-6.5	X		-	-	-	-	-	-	-	-	335
	"	7-7.5	X		-	-	-	-	-	-	-	-	173
AH-5	2/13/2013	0-1	X		8.95	133	142	<0.0200	<0.0200	<0.0200	<0.0200	<0.0200	3,880
	"	1-1.5	X		-	-	-	-	-	-	-	-	543
	"	2-2.5	X		-	-	-	-	-	-	-	-	3,800
	"	3-3.5	X		-	-	-	-	-	-	-	-	589
	"	4-4.5	X		-	-	-	-	-	-	-	-	497
	"	5-5.5	X		-	-	-	-	-	-	-	-	452
	"	6-6.5	X		-	-	-	-	-	-	-	-	221
	"	7-7.5	X		-	-	-	-	-	-	-	-	126

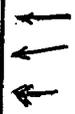


Table 1
COG Operating LLC.
F.M. Robinson #1 Tank Battery
Eddy County, New Mexico

Sample ID	Sample Date	Sample Depth (ft)	Soil Status		TPH (mg/kg)			Benzene (mg/kg)	Toluene (mg/kg)	Ethlybenzene (mg/kg)	Xylene (mg/kg)	Total BTEX (mg/kg)	Chloride (mg/kg)
			In-Situ	Removed	GRO	DRO	Total						
AH-10	2/13/2013	0-1	X		626	964	1,590	<0.400	5.76	11.6	21.9	39.3	1,830
	"	1-1.5	X		-	-	-	-	-	-	-	-	271
	"	2-2.5	X		-	-	-	-	-	-	-	-	227
	"	3-3.5	X		-	-	-	-	-	-	-	-	367
	"	4-4.5	X		-	-	-	-	-	-	-	-	991
	"	5-5.5	X		-	-	-	-	-	-	-	-	648
	"	6-6.5	X		-	-	-	-	-	-	-	-	474
	"	7-7.5	X		-	-	-	-	-	-	-	-	303
	"	8-8.5	X		-	-	-	-	-	-	-	-	323
"	9-9.5	X		-	-	-	-	-	-	-	-	499	
AH-11	2/13/2013	0-1	X		4.91	76.4	81.3	<0.0200	<0.0200	<0.0200	<0.0200	<0.0200	34.2
	"	1-1.5	X		-	-	-	-	-	-	-	-	196
	"	2-2.5	X		-	-	-	-	-	-	-	-	48.9
	"	3-3.5	X		-	-	-	-	-	-	-	-	53.8
AH-12	2/13/2013	0-1	X		1,800	1,290	3,090	3.93	52.9	47.5	77.5	182	103
	"	1-1.5	X		-	-	-	<0.100	2.26	8.28	14.2	24.7	<20.0
	"	2-2.5	X		-	-	-	-	-	-	-	-	<20.0
	"	3-3.5	X		-	-	-	-	-	-	-	-	127
	"	4-4.5	X		-	-	-	-	-	-	-	-	468

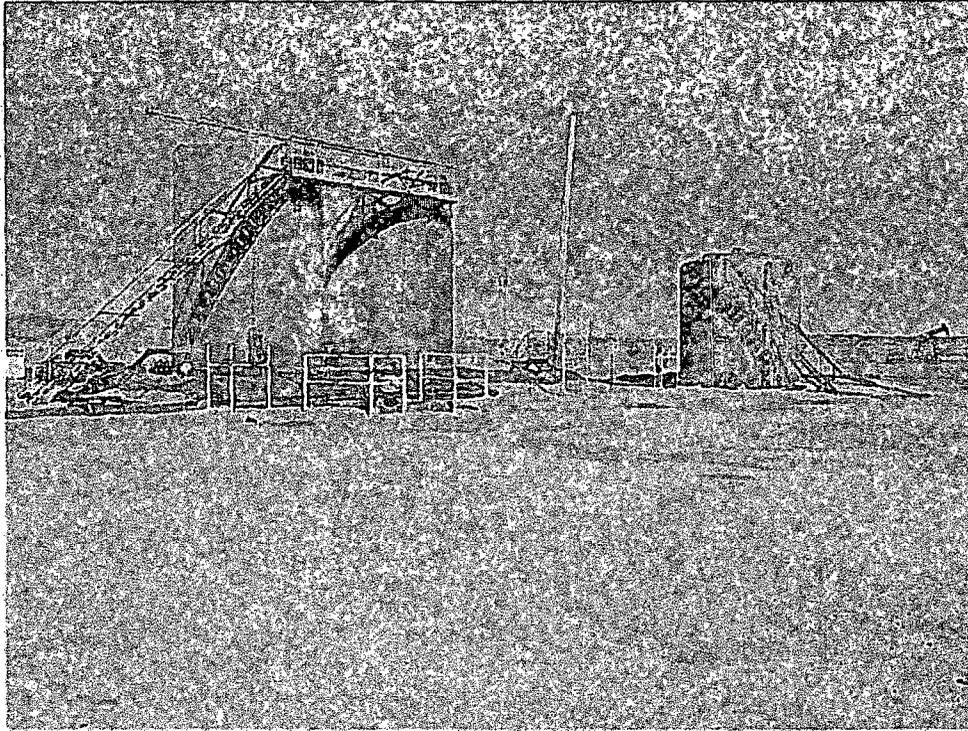
DRO 1800 @ 0-1'

(-) Not Analyzed
 Proposed Excavation Depths
 Proposed Loner or Clay Installation

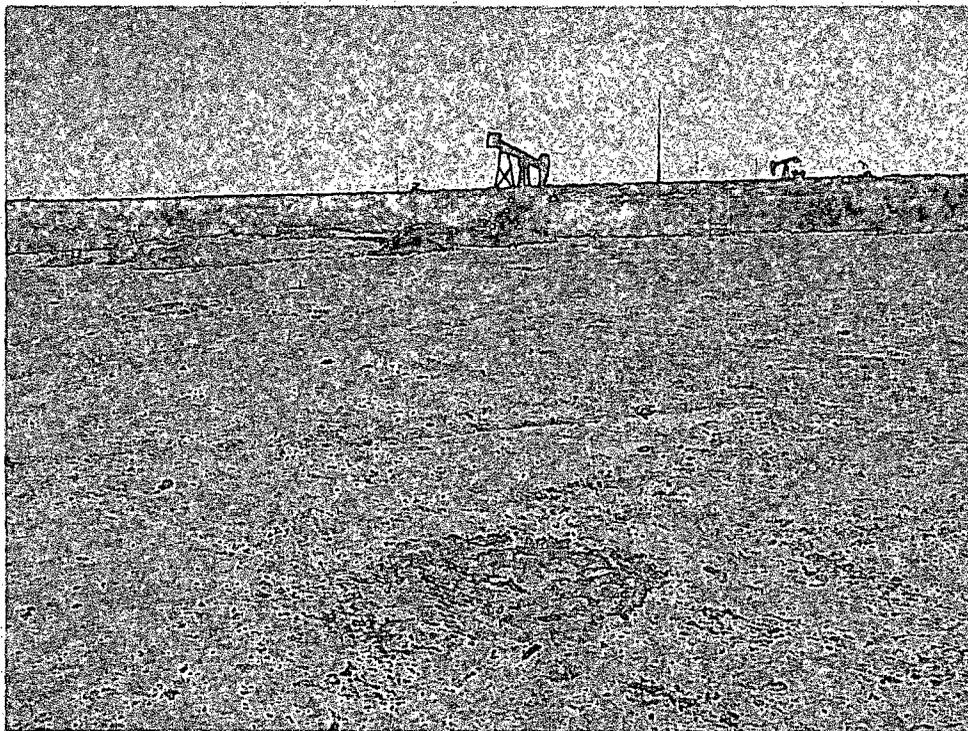
COG Operating LLC
F.M. Robinson Tank Battery
Eddy County, New Mexico



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View Northeast – Area of AH-1(SB-1) and AH-2

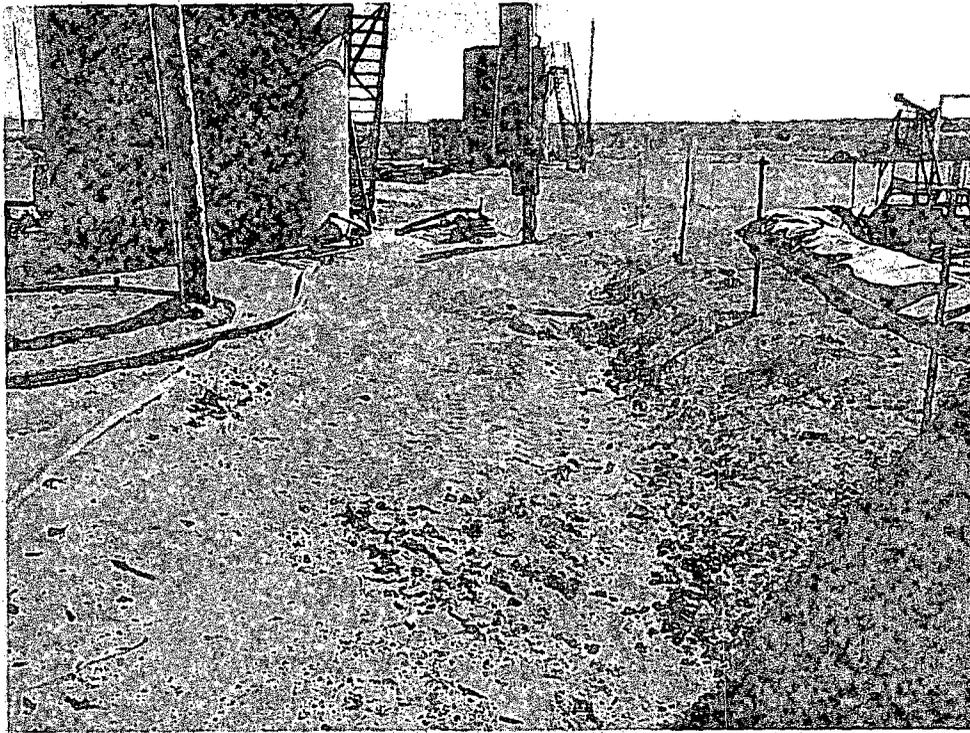


View South – Area of AH-3, AH-4 and AH-5

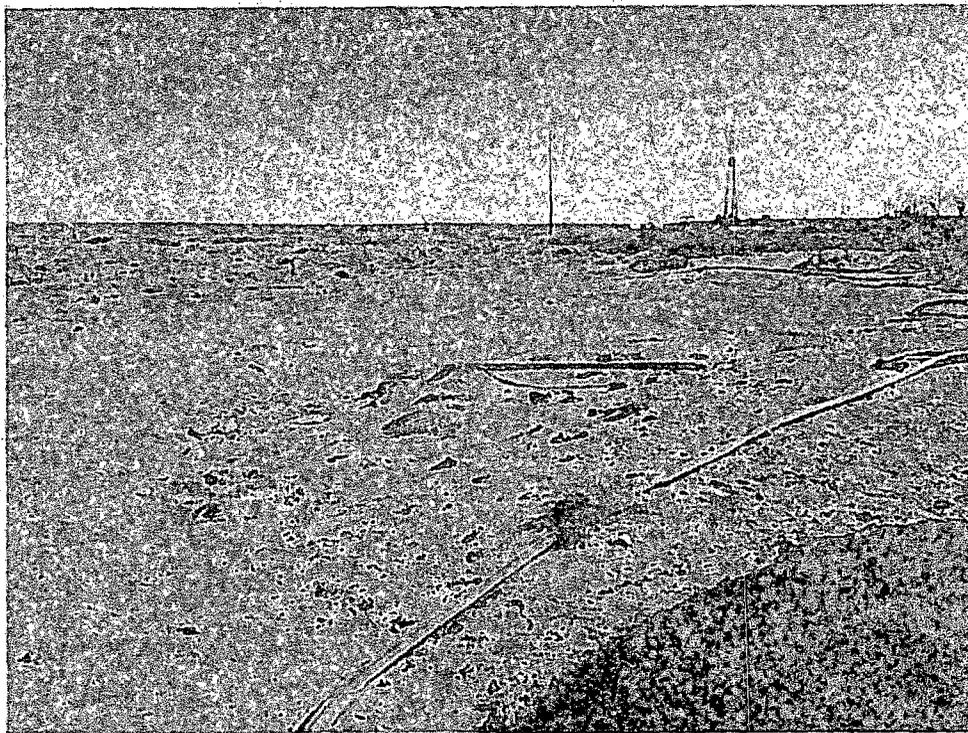
COG Operating LLC
F.M. Robinson Tank Battery
Eddy County, New Mexico



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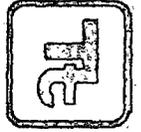


View South – Area of AH-6 (SB-2)



View Southeast – Area of AH-7 (SB-3)

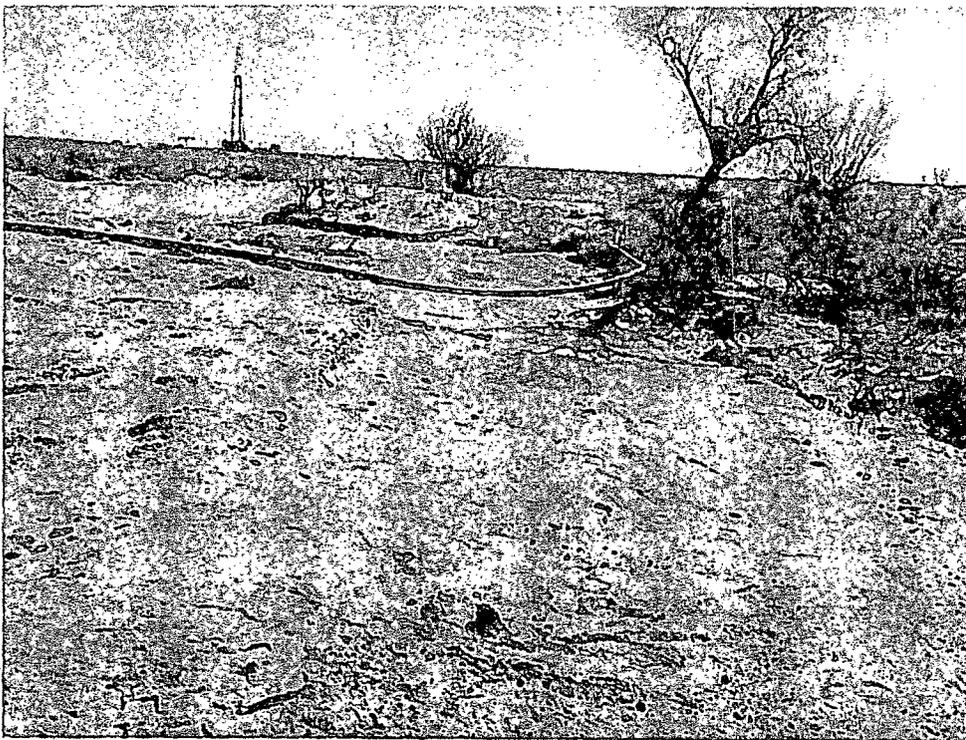
COG Operating LLC
F.M. Robinson Tank Battery
Eddy County, New Mexico



TETRA TECH



View South – Area of AH-8 and AH-9 (SB-3)

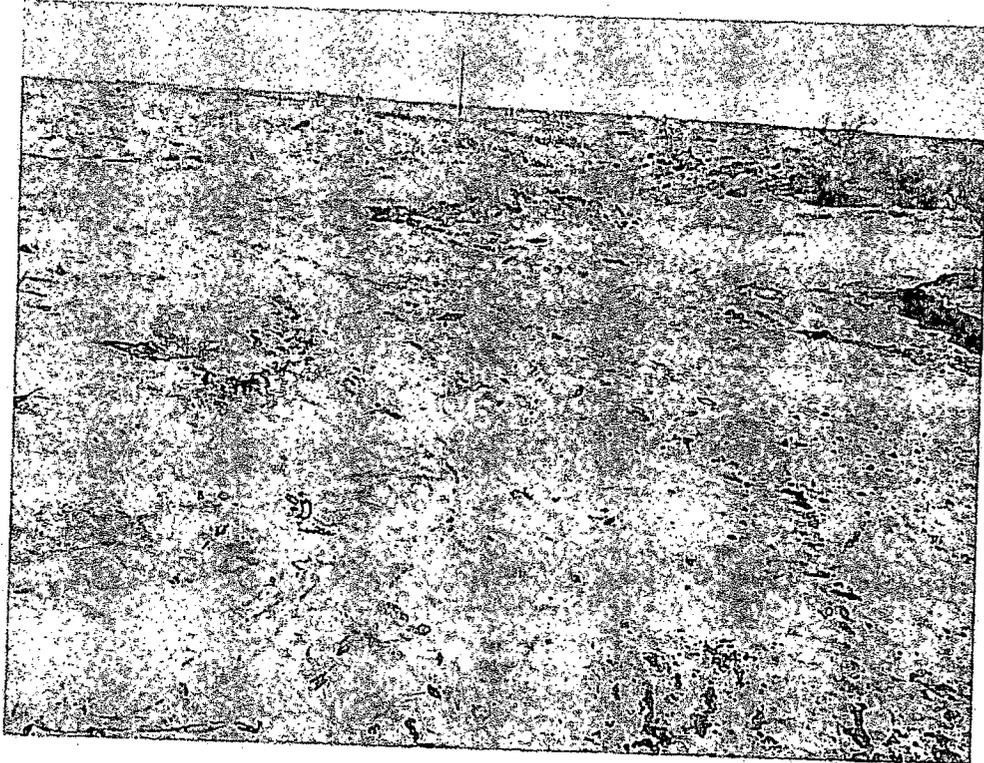


View South – Area of AH-10 and AH-11

COG Operating LLC
F.M. Robinson Tank Battery
Eddy County, New Mexico



TETRA TECH



View South – Area of AH-11 and AH-12