SITE INFORMATION

Report Type: Work Plan

General Site Information:						
Site:	MYOX State 32 #3H					
Company:	COG Operating LLC					
Section, Township and Range	Unit D	Sec 32	25S	28E		
Lease Number:	(API#) 30-015-41642					
County:	Eddy County					
GPS:	32.09383° N			104.11525° W		
Surface Owner:	State					
Mineral Owner:						
Directions:	From Carlsbad, NM, travel south on US 285 thru Malaga, NM and turn west at mile marker 8. Follow lease road to its end. Site is at the end of this lease road.					

Release Data:	
Date Released:	1/17/2014
Type Release:	Produced Water
Source of Contamination:	Poly line failure
Fluid Released:	18 bbls Produced Water
Fluids Recovered:	17 bbls Produced Water

Official Communication:			
Name:	Robert Grubbs		Darrell Moore
Company:	COG Operating, LLC		EnTech Consulting
Address:	One Concho Center		PO Box 9843
	600 W. Illinois Ave.		
City:	Midland Texas, 79701		Midland, Texas
Phone number:	(432) 661-6601		(432) 266-8375
Fax:	(432) 684-7137		
Email:	RGrubbs@concho.com		darrell.moore@entechservice.com

Ranking Criteria		
Depth to Groundwater:	***Ranking Score***	***Site Data***
<50 ft	20	
50-99 ft	10	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:	**10**	

Acceptable Soil RRAL (mg/kg)		
Benzene	***Total BTEX***	***TPH***
10	50	1,000

March 27, 2014

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

RE: Work Plan for the COG Operating LLC., MYOX State 32 #3, Unit D, Section 32, Township 25 South, Range 28 East, Eddy County, New Mexico.

Dear Mr. Bratcher:

EnTech Consulting Corp. (EnTech) has been contacted by COG Operating LLC. (COG) to assess a spill from a poly line near the MYOX State 32 #3 located in Unit D, Section 32, Township 25 South, Range 28 East, Eddy County, New Mexico (Site). The spill site coordinates are N 32.09383°, W 104.11525°. 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 17, 2014, and released approximately 18 barrels of produced water from a clamp on a poly line. COG personnel shut down the transfer pump and fused the line back together. Approximately 17 barrels of standing fluids were recovered. The initial C-141 form is enclosed in **Appendix A**.

Groundwater

No water wells were listed in the State Engineers Office Database in Section 32, Township 25 South, Range 28 East. The closest reference was in Section 28, Township 25 South, Range 28 East, which is just south of the Site. Groundwater at that location is listed at 90 feet. 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 1,000 mg/kg.

Soil Assessment and Analytical Results

On February 20, 2014, EnTech personnel inspected and sampled the spill area. Two (2) auger holes (AH-1 and AH-2) were installed using a stainless steel hand auger to assess the impacted soils (**Figure 3**). Samples were analyzed for TPH analysis by EPA Method 8015 modified, BTEX by EPA Method 8021B and chloride by EPA Method 300.0. The sampling results are summarized in **Table 1** and auger hole locations are shown in **Figure 3**. Copies of laboratory analysis and chain-of-custody documentation are included in **Appendix C**.

Referring to Table 1, none of the samples exceeded the TPH, BTEX, and benzene RRAL. However, elevated chloride concentrations were detected in the two auger holes. Auger Hole #1 (AH-1) showed no impact at surface down to 1.5 feet. However, chloride concentrations increased with depth from 1.5 feet down to 4.5 feet where the concentration is 1350 mg/kg. Auger Hole #2 also showed no impact at the surface down to 2.5 feet. Below 2.5 feet chloride content increased down to 4.5 feet where the concentration is at 262 mg/kg.

Work Plan

COG proposes to remove impacted material as highlighted (green) in **Table 1** and shown in **Figure 4**. The proposed excavation in the vicinity of AH #2 will remove visually surface stained soils. EnTech will install a backhoe trench in the area of AH-1 (Example) to define the extents. Based on the field results, the area will be appropriately addressed. However, the excavation will be guided by visual evidence and chloride titration samples. Once the contaminated soils have been excavated, confirmation samples will be collected and sent for laboratory analysis. Once these samples have confirmed the clean-up, the excavation will be backfilled with clean soil. The excavated soil will be transported to an approved disposal facility.

The proposed excavation depths may not be reached due to situations beyond our control including safety concerns for onsite personnel and impacted soil around structures or lines. As such, EnTech 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 this assessment or the proposed remediation activities for this site, please call me at 432-266-8375.

EnTech Consulting Corporation
21 Waterway Ave., Suite 300, The Woodlands, TX 77380
P: (281) 362-2714 F: (281) 362-2704

Mr. Mike Bratcher
Work Plan for the COG Operating LLC.
Project Name: MYOX State 32 #3

March 27, 2014

Respectfully submitted,
EnTech Consulting Corp.

Darrell Moore
Regional Project Manager

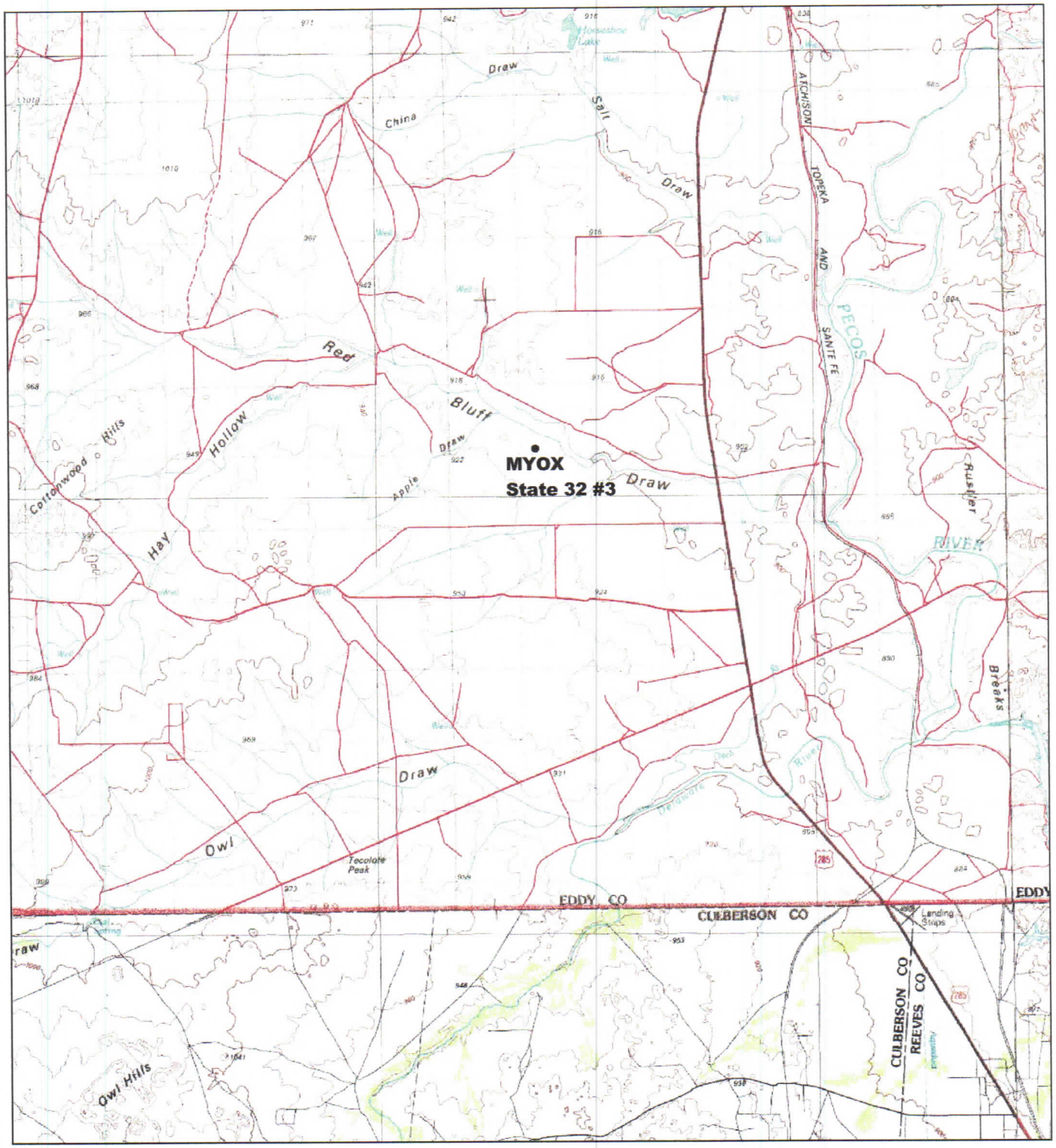
Chan Patel
Sr. Project Manager

Enclosures
Figures 1-4
Table 1
Appendix A - Initial C-141
Appendix B – Groundwater Data
Appendix C – Laboratory Report

Cc: Robert McNeill – COG
Cc: Mike Burton – BLM

EnTech Consulting Corporation
21 Waterway Ave., Suite 300, The Woodlands, TX 77380
P: (281) 362-2714 F: (281) 362-2704

FIGURES



2 1 0 1 2

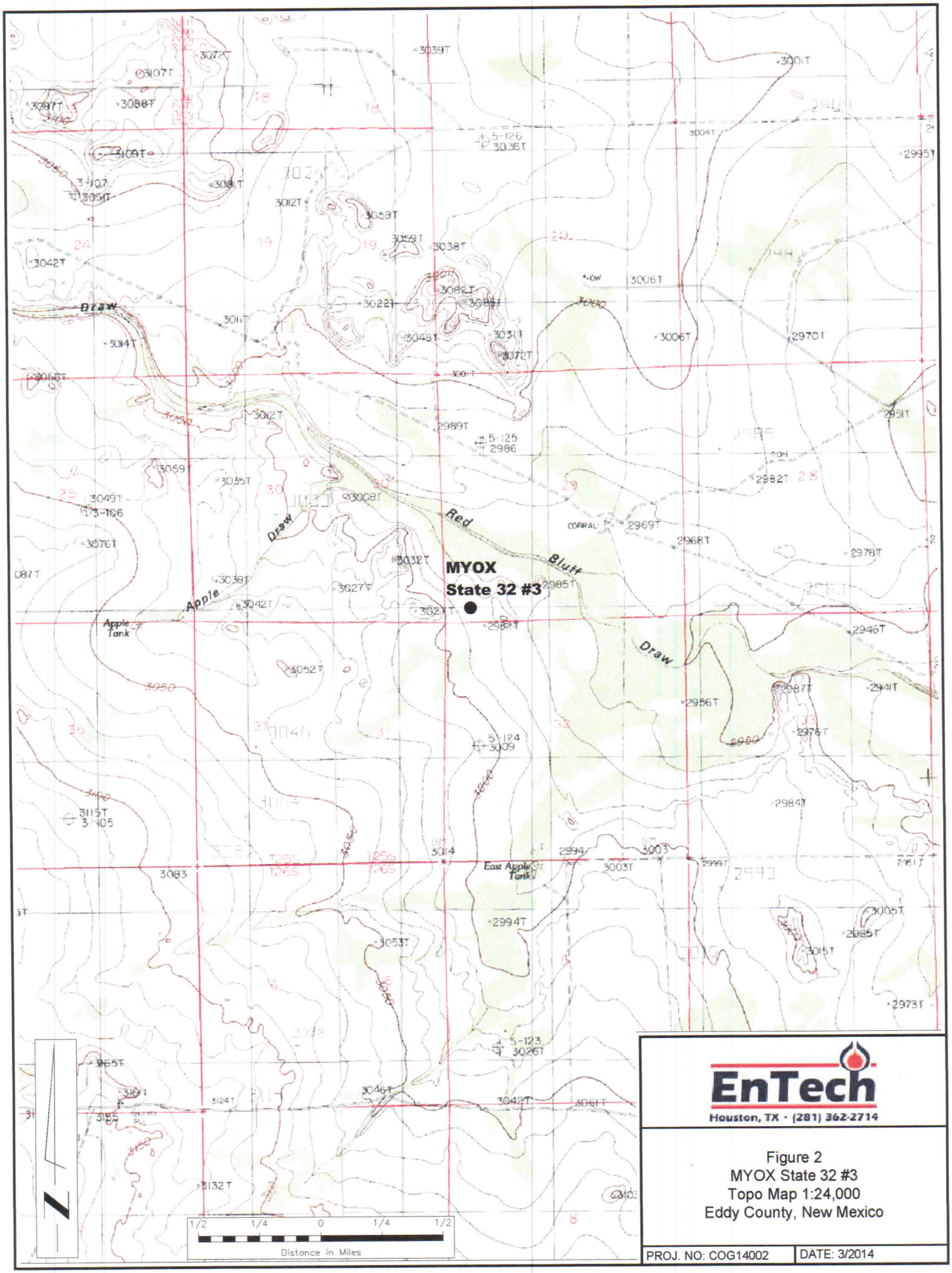
Distance in Miles

EnTech

Houston, TX · (281) 362-2714

Figure 1
MYOX State 32 #3
Overview Map
Eddy County, New Mexico

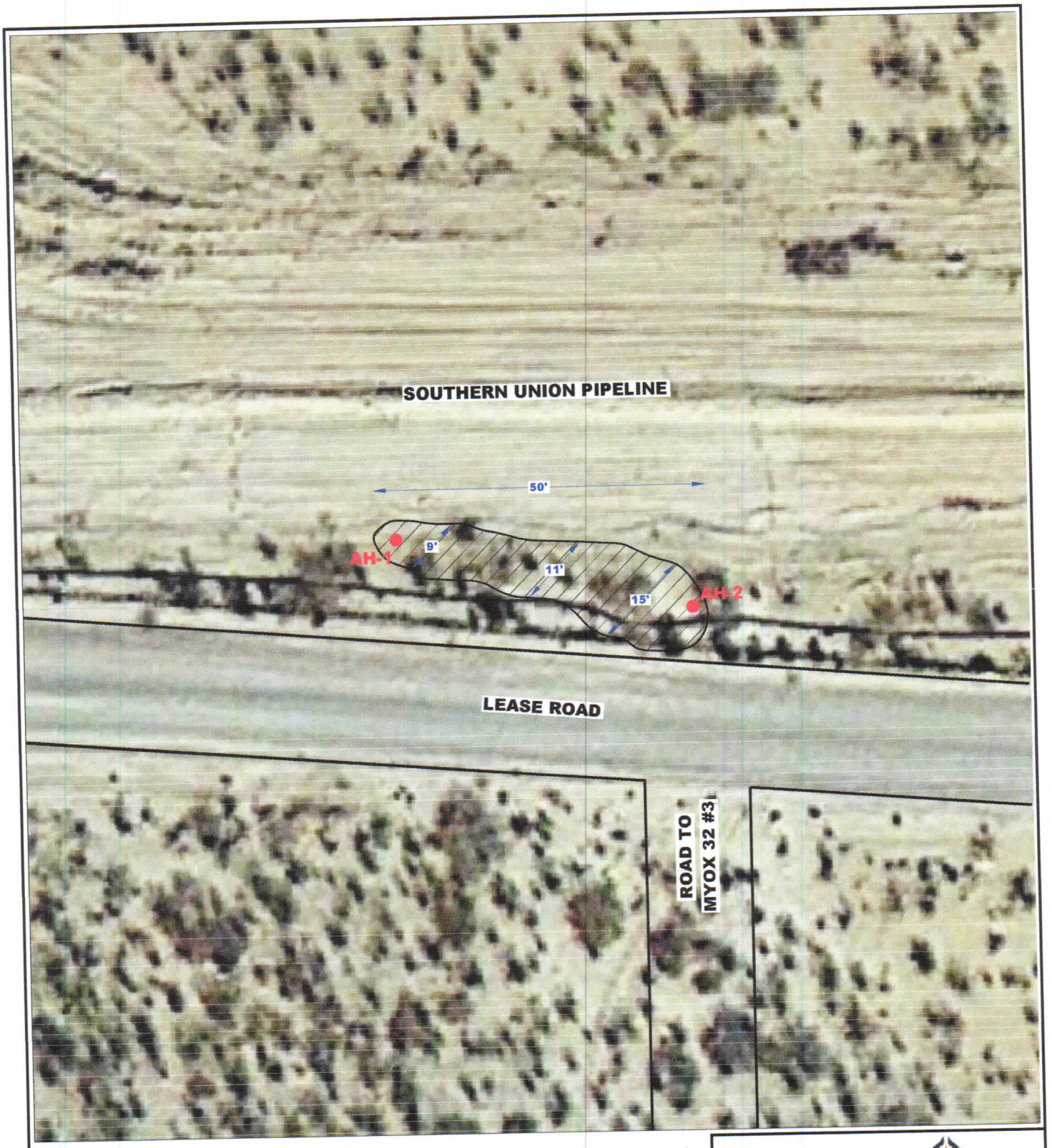
PROJ. NO: COG14002	DATE: 3/2014



EnTech
Houston, TX · (281) 362-2714

Figure 2
MYOX State 32 #3
Topo Map 1:24,000
Eddy County, New Mexico

PROJ. NO: COG14002 | DATE: 3/2014



LEGEND:

- AUGER HOLE SAMPLE LOCATION
- SPILL AREA

0 10 20

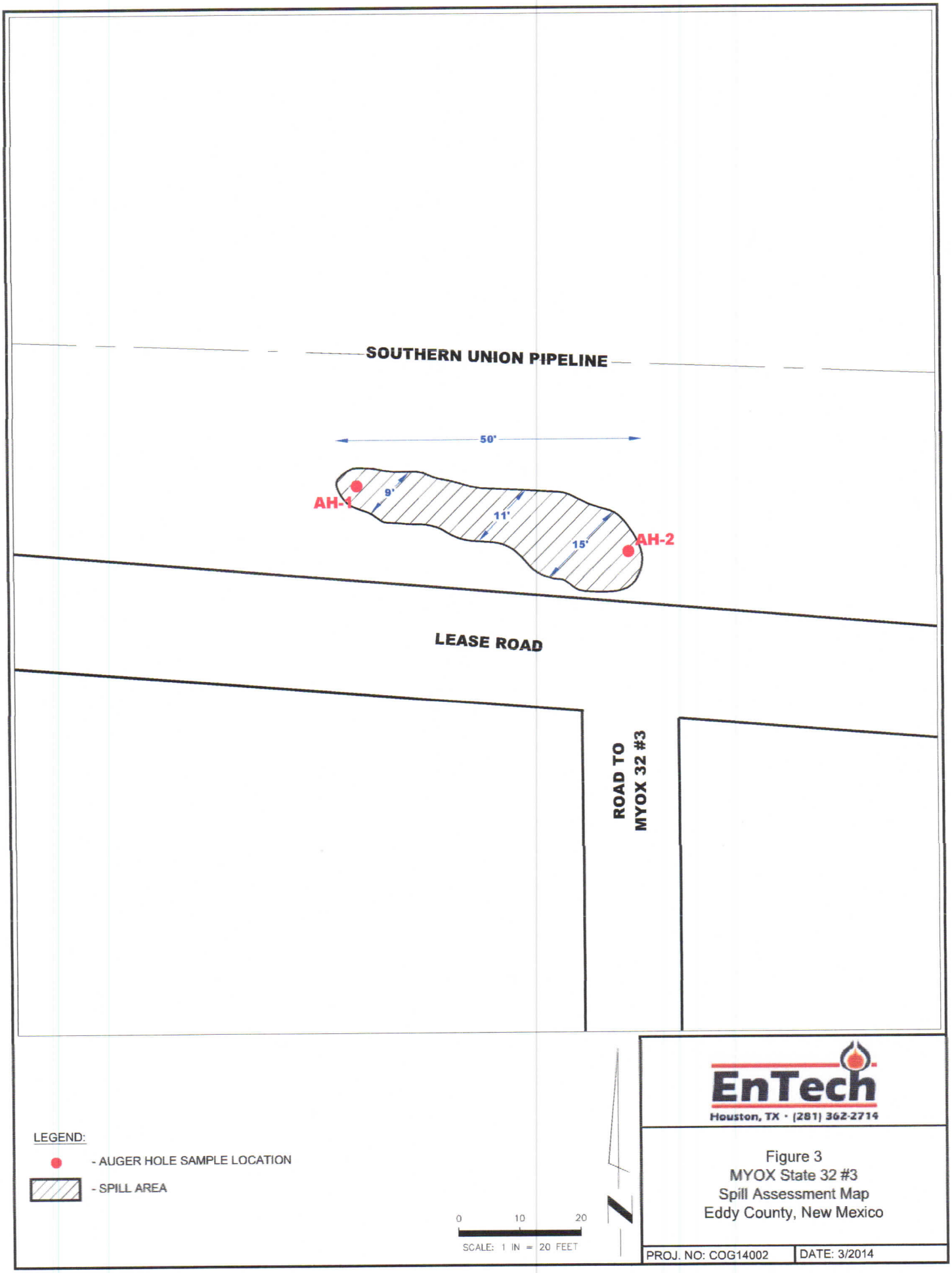
SCALE: 1 IN = 20 FEET

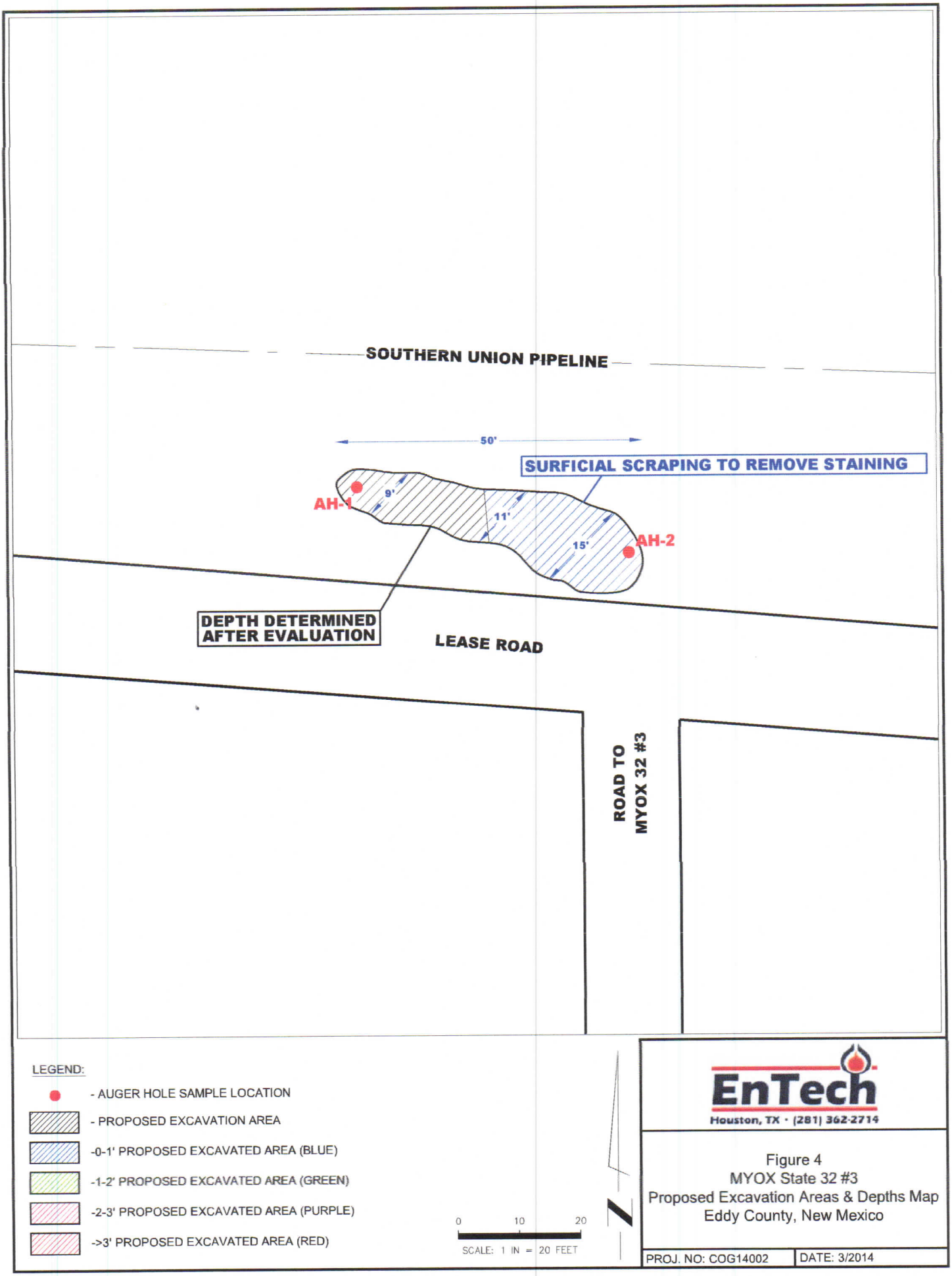
EnTech

Houston, TX · (281) 362-2714

Figure 3
MYOX State 32 #3
Spill Assessment Map
Eddy County, New Mexico

PROJ. NO: COG14002 | DATE: 3/2014


SOUTHERN UNION PIPELINE
50'
AH-1
9'
11'
15'
AH-2
LEASE ROAD
ROAD TO
MYOX 32 #3
LEGEND:
- AUGER HOLE SAMPLE LOCATION
- SPILL AREA
0
10
20
SCALE: 1 IN = 20 FEET
EnTech
Houston, TX · (281) 362-2714
Figure 3
MYOX State 32 #3
Spill Assessment Map
Eddy County, New Mexico
PROJ. NO: COG14002
DATE: 3/2014


SOUTHERN UNION PIPELINE
50'
SURFICIAL SCRAPING TO REMOVE STAINING
AH-1
9'
11'
15'
AH-2
DEPTH DETERMINED AFTER EVALUATION
LEASE ROAD
ROAD TO MYOX 32 #3
LEGEND:
- AUGER HOLE SAMPLE LOCATION
- PROPOSED EXCAVATION AREA
-0-1' PROPOSED EXCAVATED AREA (BLUE)
-1-2' PROPOSED EXCAVATED AREA (GREEN)
-2-3' PROPOSED EXCAVATED AREA (PURPLE)
->3' PROPOSED EXCAVATED AREA (RED)
0
10
20
SCALE: 1 IN = 20 FEET
EnTech
Houston, TX · (281) 362-2714
Figure 4
MYOX State 32 #3
Proposed Excavation Areas & Depths Map
Eddy County, New Mexico
PROJ. NO: COG14002
DATE: 3/2014

TABLES

Table 1. COG Operating LLC.
MYOX State 32 #3 Eddy County, NM

Concho MYOX 32 3H Malaga, NM

Sample ID Number	Sample Date	Sample Depth (feet)	BEB Depth (feet)	Soil Status		SW 846-8021B					SW 846-8021B			
				In -situ	Removed	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Total Xylenes (mg/kg)	Total BTEX (mg/kg)	TPH GRO (mg/kg)	TPH DRO (mg/kg)	Total TPH (mg/kg)	Chlorides (mg/kg)
						NMOCD Remediation Criteria					NMOCD Remediation Criteria for TPH			
						10 mg/kg				50 mg/kg			1000 mg/kg	
AH-1	02/20/14	0-1'				<0.0200	<0.0200	<0.0200	<0.0200	<0.0200	<4.00	<50.0		<20.0
AH-1	02/20/14	1.5												<20.0
AH-1	02/20/14	2.5												152
AH-1	02/20/14	3.5												1050
AH-1	02/20/14	4.5 T												1350
AH-2	02/20/14	0-1'				<0.0200	<0.0200	<0.0200	<0.0200	<0.0200	<4.00	<50.0		<20.0
AH-2	02/20/14	1.5												<20.0
AH-2	02/20/14	2.5												<20.0
AH-2	02/20/14	3.5												105
AH-2	02/20/14	4.5												262

NMOCD: New Mexico Oil Conservation Division

Exceedences of NMOCD Remediation Criteria are shown in **bold**

Green indicates depth to be excavated

T Indicates that depth to be excavated will be determined in the field

PHOTOS

COG Operating LLC
MYOX State 32 #3
Eddy County, New Mexico

View looking East AH #1 in background

View looking West AH #2 in background

APPENDIX A

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

OPERATOR

☒ Initial Report ☐ Final Repor

Name of Company	COG OPERATING LLC	Contact	Robert McNeill
Address	600 West Illinois Avenue, Midland, TX 79701	Telephone No.	432-230-0077
Facility Name	Myox 32 State #003H	Facility Type	Flowline

Surface Owner State	Mineral Owner	Lease No. (API#) 30-015-41642

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
D	32	25S	28E					Eddy

Latitude 32 05.660 **Longitude** 104 07.012

NATURE OF RELEASE

Type of Release Produced water	Volume of Release 18bbls	Volume Recovered 17bbls
Source of Release Poly flowline	Date and Hour of Occurrence 01-17-2014	Date and Hour of Discovery 01-17-2014 4:20pm
Was Immediate Notice Given? ☐ Yes ☒ No ☒ Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

Poly crew cut into the line and squeezed off both ends. The water transfer pump kicked on building up pressure until the clamp on the upstream side failed. Shut down transfer pump and fused the line back together.

Describe Area Affected and Cleanup Action Taken.*

Initially 18bbls of produced water were released. We were able to recover 17bbls of produced water with a vacuum truck. All free fluids have been recovered. Concho will have the spill site sampled to delineate any possible contamination from the release and we will present a remediation 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:	OIL CONSERVATION DIVISION
Printed Name: Robert Grubbs Jr.	Approved by District Supervisor:
Title: Senior Environmental Coordinator	Approval Date: / Expiration Date:
E-mail Address: rgrubbs@concho.com	Conditions of Approval: / Attached ☐
Date: 01-24-2014 Phone: 432-661-6601	

* Attach Additional Sheets If Necessary

APPENDIX B

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	POD Sub-basin Code	County	Q 64	Q 16	Q 4	Sec	Twn	Rng	X	Y	Depth Well	Depth Water	Water Column
C 01278	C	ED		4	3	28	25S	28E	585470	3551338*	205	90	115
C 01411	C	ED	4	4	2	04	25S	28E	586289	3558522*	69	35	34
C 01453	C	ED		1	2	26	25S	28E	589096	3552612*	70	40	30
C 01522	C	ED			1	22	25S	28E	586843	3554004*	150		
C 01573 POD1	C	ED	3	1	4	20	25S	28E	584144	3553361	176	96	80
C 02668	C	ED	2	1	2	09	25S	28E	585890	3557525*	150		
C 03263 POD1	C	ED	1	1	1	07	25S	28E	581628	3557501*	133		

Average Depth to Water: **65 feet**

Minimum Depth: **35 feet**

Maximum Depth: **96 feet**

Record Count: 7

PLSS Search:

Township: 25S **Range:** 28E

***UTM location was derived from PLSS - see Help**

APPENDIX C

Summary Report

Darrell Moore
EnTech Consulting-The Woodlands
21 Waterway Avenue
Suite 300
The Woodlands, TX 77380

Report Date: March 3, 2014

Work Order: 14022126

Project Location: Magala, NM
Project Name: Myox 32 3H

Sample	Description	Matrix	Date Taken	Time Taken	Date Received
355503	AH 1-0-1'	soil	2014-02-20	11:00	2014-02-21
355504	AH 1-1.5	soil	2014-02-20	11:05	2014-02-21
355505	AH 1-2.5	soil	2014-02-20	11:10	2014-02-21
355506	AH 1-3.5	soil	2014-02-20	11:15	2014-02-21
355507	AH 1-4.5	soil	2014-02-20	11:20	2014-02-21
355508	AH 2-0-1'	soil	2014-02-20	11:25	2014-02-21
355509	AH 2-1.5	soil	2014-02-20	11:30	2014-02-21
355510	AH 2-2.5	soil	2014-02-20	11:35	2014-02-21
355511	AH 2-3.5	soil	2014-02-20	11:40	2014-02-21
355512	AH 2-4.5	soil	2014-02-20	11:45	2014-02-21

	BTEX				TPH DRO - NEW	TPH GRO
Sample - Field Code	Benzene (mg/Kg)	Toluene (mg/Kg)	Ethylbenzene (mg/Kg)	Xylene (mg/Kg)	DRO (mg/Kg)	GRO (mg/Kg)
355503 - AH 1-0-1'	<0.0200	<0.0200	<0.0200	<0.0200	<50.0	<4.00
355508 - AH 2-0-1'	<0.0200	<0.0200	<0.0200	<0.0200	<50.0	<4.00

Sample: 355503 - AH 1-0-1'

Param	Flag	Result	Units	RL
Chloride		<20.0	mg/Kg	4

Sample: 355504 - AH 1-1.5

Param	Flag	Result	Units	RL
Chloride		<20.0	mg/Kg	4

Sample: 355505 - AH 1-2.5

Param	Flag	Result	Units	RL
Chloride		**152**	mg/Kg	4

Sample: 355506 - AH 1-3.5

Param	Flag	Result	Units	RL
Chloride		**1050**	mg/Kg	4

Sample: 355507 - AH 1-4.5

Param	Flag	Result	Units	RL
Chloride		**1350**	mg/Kg	4

Sample: 355508 - AH 2-0-1'

Param	Flag	Result	Units	RL
Chloride		<20.0	mg/Kg	4

Sample: 355509 - AH 2-1.5

Param	Flag	Result	Units	RL
Chloride		<20.0	mg/Kg	4

Sample: 355510 - AH 2-2.5

Param	Flag	Result	Units	RL
Chloride		<20.0	mg/Kg	4

Sample: 355511 - AH 2-3.5

Param	Flag	Result	Units	RL
Chloride		**105**	mg/Kg	4

Sample: 355512 - AH 2-4.5

Param	Flag	Result	Units	RL
Chloride		**262**	mg/Kg	4

LAB Order ID # 14022126

Page 1 of 1

TraceAnalysis, Inc.

email: lab@traceanalysis.com

6701 Aberdeen Avenue, Suite 9
Lubbock, Texas 79424
Tel (806) 794-1296
Fax (806) 794-1298
1 (800) 378-1296

5002 Basin Street, Suite A1
Midland, Texas 79703
Tel (432) 689-6301
Fax (432) 689-6313

200 East Sunset Rd., Suite E
El Paso, Texas 79922
Tel (915) 585-3443
Fax (915) 585-4944
1 (888) 588-3443

BioAquatic Testing
2501 Mayes Rd., Ste 100
Carrollton, Texas 75006
Tel (972) 242-7750

Brandon & Clark
3403 Industrial Blvd.
Hobbs, NM 88240
Tel (575) 392-7561
Fax (575) 392-4508

Company Name: EnTech Consulting — **Phone #:** 432.266.8375

Address: (Street, City, Zip) 21 Waterway Ave #300 Woodlands TX 77380 — **Fax #:** 281-362-2704

Contact Person: Darrell Moore — **E-mail:** Darrell.Moore@entechservice.com

Invoice to: (If different from above) Concho Attn Robert Grubbs Myox 32 3H — **Project #:** — **Project Name:**

Project Location (including state): Maljamar NM — **Sampler Signature:** D. A. Dell

ANALYSIS REQUEST
(Circle or Specify Method No.)

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume / Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	PRESERVATIVE METHOD: HCl	HNO_3	H_2SO_4	NaOH	ICE	NONE	SAMPLING: DATE	TIME	MTBE 8021 / 602 / 8260 / 624	BTEX 8021 / 602 / 8260 / 624	TPH 418.1 / TX1005 / TX1005 Ext(C35)	TPH 8015 GRO / DRO / TVHC no3.	PAH 8270 / 625	Total Metals Ag As Ba Cd Cr Pb Se Hg 6010/200.7	TCLP Metals Ag As Ba Cd Cr Pb Se Hg	TCLP Volatiles	TCLP Semi Volatiles	TCLP Pesticides	RCI	GC/MS Vol. 8260 / 624	GC/MS Semi. Vol. 8270 / 625	PCB's 8082 / 608	Pesticides 8081 / 608	BOD, TSS, pH	Moisture Content	Cl, F, SO_4, NO_3-N, NO_2-N, PO_4-P, Alkalinity	Na, Ca, Mg, K, TDS, EC	Chlorides				Turn Around Time if different from standard	Hold
505	AH 1 - 0-1'				X							X		2-20	1100		X		X															X					
504	AH 1 - 1.5														1105																									
505	AH 1 - 2.5														1110																									
506	AH 1 - 3.5														1115																									
507	AH 1 - 4.5														1120																									
508	AH 2 - 0-1'														1125		X		X																					
509	AH 2 - 1.5														1130																									
510	AH 2 - 2.5														1135																									
511	AH 2 - 3.5														1140																									
512	AH 2 - 4.5				X							X			1145																					X				
												X		2-20																									

Relinquished by:	Company:	Date:	Time:	Received by:	Company:	Date:	Time:	
D. A. Dell	EnTech	2-21-14	1400	Allison Johnson		2/21/14	14:00	INST IR °C OBS 4.1 °C COR 4.0 °C
								INST °C OBS °C COR °C
								INST °C OBS °C COR °C

LAB USE ONLY
Intact Y / N
Headspace Y / N / NA
Log-in-Review

- Dry Weight Basis Required
- TRRP Report Required
- Check If Special Reporting Limits Are Needed

REMARKS:
If BTEX/TPH are in exceedence Please run next sample in line. State standards
TPH - 1000
Email results.
Benzene - 10
BTEX - 50
TPH - 100

Submittal of samples constitutes agreement to Terms and Conditions listed on reverse side of C. O. C.

Carrier # Carry-in

ORIGINAL COPY

SITE INFORMATION

Report Type: Work Plan

General Site Information:						
Site:	MYOX State 32 #3H					
Company:	COG Operating LLC					
Section, Township and Range	Unit D	Sec 32	25S	28E		
Lease Number:	(API#) 30-015-41642					
County:	Eddy County					
GPS:	32.09383° N			104.11525° W		
Surface Owner:	State					
Mineral Owner:						
Directions:	From Carlsbad, NM, travel south on US 285 thru Malaga, NM and turn west at mile marker 8. Follow lease road to its end. Site is at the end of this lease road.					

Release Data:	
Date Released:	1/17/2014
Type Release:	Produced Water
Source of Contamination:	Poly line failure
Fluid Released:	18 bbls Produced Water
Fluids Recovered:	17 bbls Produced Water

Official Communication:			
Name:	Robert Grubbs		Darrell Moore
Company:	COG Operating, LLC		EnTech Consulting
Address:	One Concho Center		PO Box 9843
	600 W. Illinois Ave.		
City:	Midland Texas, 79701		Midland, Texas
Phone number:	(432) 661-6601		(432) 266-8375
Fax:	(432) 684-7137		
Email:	RGrubbs@concho.com		darrell.moore@entechservice.com

Ranking Criteria		
Depth to Groundwater:	***Ranking Score***	***Site Data***
<50 ft	20	
50-99 ft	10	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:	**10**	

Acceptable Soil RRAL (mg/kg)		
Benzene	***Total BTEX***	***TPH***
10	50	1,000

March 18, 2014

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

RE: Work Plan for the COG Operating LLC., MYOX State 32 #3, Unit D, Section 32, Township 25 South, Range 28 East, Eddy County, New Mexico.

Dear Mr. Bratcher:

EnTech Consulting Corp. (EnTech) has been contacted by COG Operating LLC. (COG) to assess a spill from a poly line near the MYOX State 32 #3 located in Unit D, Section 32, Township 25 South, Range 28 East, Eddy County, New Mexico (Site). The spill site coordinates are N 32.09383°, W 104.11525°. 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 17, 2014, and released approximately 18 barrels of produced water from a clamp on a poly line. COG personnel shut down the transfer pump and fused the line back together. Approximately 17 barrels of standing fluids were recovered. The initial C-141 form is enclosed in Appendix A.

Groundwater

No water wells were listed in the State Engineers Office Database in Section 32, Township 25 South, Range 28 East. The closest reference was in Section 5, Township 26 South, Range 28 East, which is just south of the Site. Groundwater at that location is listed at 100 feet. 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