



August 4, 2015

Oil Conservation Division
District 2 – Artesia
811 S. First St.
Artesia, NM 88210

Re: Owl 20504 JV-P #5 SWD
30-015-35435
Sec. 18, T26S-R27E
Eddy County, NM

Mr. Mike Bratcher,

COG Operating LLC would like to submit for your consideration the enclosed work plan/closure report for the above captioned well. The plan is in response to the C-141 Initial report dated July 9, 2015.

Background

The release was due to a tank over flow resulting in the release of 100 barrels of oil and 510 barrels of produced water of which 90 barrels of oil and 500 barrels of produced water were recovered. The majority of the released fluid was contained within the lined facility and a portion of the release (approximately 15 barrels) overran the dike and remained on the location. Upon discovery, vacuum trucks were dispatched to recover standing fluid and an initial scrape was completed on the location. The attached Site Diagram depicts the approximate area impacted by the release and the approximate location of the points sampled.

Groundwater

Based on the information obtained on the New Mexico Office of the State Engineer Website and the approximate elevation of the location, the release area would be classified at a site ranking of **Zero** with depth to groundwater at greater than 100'. The NMOSE Website indicates two existing wells (Section 5 & 7, T26S-R27E) within a mile of the Owl SWD with a difference in elevation of 100' in comparison to the SWD. The location for the Owl SWD is situated on a hillside south of the draw in which these two wells are located making the depth to groundwater for the location at greater than 100'.

Soil Assessment and Analytical Results

Sample points noted on the attached Site Diagram are labeled with an S to denote samples taken within the release area.

Sample results for TPH and BTEX were tested at the 1' depth for all sample points and proved to be non-detect based on the attached Analytical Results. Chloride results proved to be slightly elevated above 1000 ppm for S1 and well within tolerable levels for S2 and S3. Analytical Results and a Site Diagram with a Sample Summary Table have been attached for your consideration.

Work Plan

COG Operating LLC proposes that no further excavation be required due to chloride levels left in place being within tolerable levels for future reclamation of the location and depth to ground water at greater than 100'.

If there are no objections or further stipulations, COG Operating LLC would like to request closure of the release. Please feel free to contact me with any questions or concerns at (575) 748-6933.

Sincerely,



Lupe Carrasco
Environmental Coordinator

Enclosure(s): Site Diagram
Analytical Results
C-141 Initial (Copy)
C-141 Final

Owl 20504 JV-P #5 SWD

June 24, 2015

Sec. 18, T26S-R27E
30-015-35435
32.0414886,-104.2282181
Released: 100 B/O; 510 B/PW
Recovered: 90 B/O; 500 B/PW

S1	CI-
1'	1170
2'	1420
3'	1570
5'	1600
6.5'	944
S2	CI-
1'	144
2'	288
S3	CI-
1'	272
2'	176



Google earth





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

July 28, 2015

LUPE CARRASCO
COG Operating, LLC
500 W. ILLINOIS
Midland, TX 79701

RE: OWL 20504 JV-P #5 SWD

Enclosed are the results of analyses for samples received by the laboratory on 07/15/15 14:10.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. 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.

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,

Celey D. Keene
Lab Director/Quality Manager

Analytical Results For:

COG Operating, LLC
LUPE CARRASCO
500 W. ILLINOIS
Midland TX, 79701
Fax To: None

Received: 07/15/2015
Reported: 07/28/2015
Project Name: OWL 20504 JV-P #5 SWD
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 07/14/2015
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Judy Garcia

Sample ID: S1-1 (H501813-01)

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	07/20/2015	ND	2.04	102	2.00	2.59	
Toluene*	<0.050	0.050	07/20/2015	ND	2.06	103	2.00	4.16	
Ethylbenzene*	<0.050	0.050	07/20/2015	ND	2.25	113	2.00	3.74	
Total Xylenes*	<0.150	0.150	07/20/2015	ND	5.91	98.4	6.00	3.95	
Total BTEX	<0.300	0.300	07/20/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 114 % 85.6-137

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1170	16.0	07/21/2015	ND	416	104	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	07/17/2015	ND	179	89.5	200	12.7	
DRO >C10-C28	<10.0	10.0	07/17/2015	ND	161	80.7	200	16.2	

Surrogate: 1-Chlorooctane 76.2 % 47.2-157

Surrogate: 1-Chlorooctadecane 80.9 % 52.1-176

Sample ID: S1-2 (H501813-02)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1420	16.0	07/21/2015	ND	416	104	400	0.00	

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

 COG Operating, LLC
 LUPE CARRASCO
 500 W. ILLINOIS
 Midland TX, 79701
 Fax To: None

 Received: 07/15/2015
 Reported: 07/28/2015
 Project Name: OWL 20504 JV-P #5 SWD
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 07/14/2015
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Judy Garcia

Sample ID: S1-3 (H501813-03)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1570	16.0	07/22/2015	ND	416	104	400	0.00	

Sample ID: S1-5 (H501813-04)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1600	16.0	07/26/2015	ND	400	100	400	7.69	

Sample ID: S1-6.5 (H501813-05)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	944	16.0	07/28/2015	ND	400	100	400	3.92	

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* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

COG Operating, LLC
LUPE CARRASCO
500 W. ILLINOIS
Midland TX, 79701
Fax To: None

Received: 07/15/2015
Reported: 07/28/2015
Project Name: OWL 20504 JV-P #5 SWD
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 07/14/2015
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Judy Garcia

Sample ID: S2-1 (H501813-06)

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	07/20/2015	ND	2.04	102	2.00	2.59	
Toluene*	<0.050	0.050	07/20/2015	ND	2.06	103	2.00	4.16	
Ethylbenzene*	<0.050	0.050	07/20/2015	ND	2.25	113	2.00	3.74	
Total Xylenes*	<0.150	0.150	07/20/2015	ND	5.91	98.4	6.00	3.95	
Total BTEX	<0.300	0.300	07/20/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 116 % 85.6-137

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	144	16.0	07/21/2015	ND	416	104	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	07/17/2015	ND	179	89.5	200	12.7	
DRO >C10-C28	<10.0	10.0	07/17/2015	ND	161	80.7	200	16.2	

Surrogate: 1-Chlorooctane 80.0 % 47.2-157

Surrogate: 1-Chlorooctadecane 84.0 % 52.1-176

Sample ID: S2-2 (H501813-07)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	288	16.0	07/21/2015	ND	416	104	400	0.00	

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

COG Operating, LLC
LUPE CARRASCO
500 W. ILLINOIS
Midland TX, 79701
Fax To: None

Received: 07/15/2015
Reported: 07/28/2015
Project Name: OWL 20504 JV-P #5 SWD
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 07/14/2015
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Judy Garcia

Sample ID: S3-1 (H501813-12)

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	07/20/2015	ND	2.04	102	2.00	2.59	
Toluene*	<0.050	0.050	07/20/2015	ND	2.06	103	2.00	4.16	
Ethylbenzene*	<0.050	0.050	07/20/2015	ND	2.25	113	2.00	3.74	
Total Xylenes*	<0.150	0.150	07/20/2015	ND	5.91	98.4	6.00	3.95	
Total BTEX	<0.300	0.300	07/20/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 113 % 85.6-137

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	272	16.0	07/21/2015	ND	416	104	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	07/17/2015	ND	179	89.5	200	12.7	
DRO >C10-C28	<10.0	10.0	07/17/2015	ND	161	80.7	200	16.2	

Surrogate: 1-Chlorooctane 73.5 % 47.2-157

Surrogate: 1-Chlorooctadecane 77.4 % 52.1-176

Sample ID: S3-2 (H501813-13)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	176	16.0	07/21/2015	ND	416	104	400	0.00	

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*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

QM-4X	The spike recovery was outside of QC acceptance limits for the MS and/or MSD due to analyte concentration at 4 times or greater the spike concentration. The QC batch was accepted based on LCS and/or LCSD recoveries within the acceptance limits.
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

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Celey D. Keene, Lab Director/Quality Manager

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST



101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

BILL TO

ANALYSIS REQUEST

Company Name: COG Operating LLC

Project Manager: Lupe Carrasco

Address: 2208 West Main

City: Artesia

State: NM

Zip

88210

Phone #: (575) 748-6940

Fax #:

Project #:

Project Owner:

Project Name: Owl 20504 JV-P #5 SWD

Project Location:

Sampler Name: Lupe Carrasco

Fax #:

P.O. #:

Company: COG Operating LLC

Attn: Robert McNeill

Address: 600 W Illinois

City: Midland

State: TX Zip: 79701

Phone #: (432) 221-0388

FOR LAB USE ONLY

Lab I.D.

Sample I.D.

#501813

S1-1
S1-2
S1-3
S1-5
S1-6.5

(G)RAB OR (C)OMP

CONTAINERS

GROUNDWATER

WASTEWATER

SOIL

OIL

SLUDGE

OTHER :

ACID/BASE

ICE / COOL

OTHER :

DATE

TIME

BTEX

TPH

Chloride

Cl added 7/21
added 7/22 Cl-
Cl added 7/27

PLEASE NOTE: Liability and Damages: Cardinal's liability and client's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruption, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated theories or otherwise.

Relinquished By:

Date:

Received By:

Relinquished By:

Date:

Received By:

Delivered By: (Circle One)

Sampler - UPS - Bus - Other:
FORM-006 R 20

Sample Condition

CHECKED BY:

Phone Result:

Yes No

Add'l Phone #:

Fax Result:

Yes No

Add'l Fax #:

REMARKS:

Run chlorides until samples fall below 1000ppm

† Cardinal cannot accept verbal changes. Please fax written changes to 575-393-2476



101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: COG Operating LLC
Project Manager: Lupe Carrasco
Address: 2208 West Main
City: Artesia
State: NM Zip: 88210
Phone #: (575) 748-6940 Fax #:
Project #:
Project Owner:
Project Name: OMI 20504 JV-P #5 SWD
Project Location:
Sample Name: Lupe Carrasco
FOR LAB USE ONLY

BILL TO
P.O. #:
Company: COG Operating LLC
Attn: Robert McNeill
Address: 600 W Illinois
City: Midland
State: TX Zip: 79701
Phone #: (432) 221-0388
Fax #:
ANALYSIS REQUEST

Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP		# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER	ACID/BASE	ICE / COOL	OTHER	DATE	TIME	BTEX	TPH	Chloride																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																		
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Relinquished By:
Date:
Time:
Received By: Judy Duran
Date: 7/15/15
Time: 14:10

Delivered By: (Circle One)
Sampler - UPS - Bus - Other:
FORM-006 R 2.0

Sample Condition
Cool ☒ Intact ☒
Yes ☒ No ☐
Checked By:
Phone Result: ☐ Yes ☐ No ☐ Add'l Phone #:
Fax Result: ☐ Yes ☐ No ☐ Add'l Fax #:
REMARKS: gcarasco@concho.com
Run chlorides until samples fall below 1000ppm

† Cardinal cannot accept verbal changes. Please fax written changes to 575-393-2476

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	Contact: Robert McNeill
Address: 600 West Illinois Avenue, Midland TX 79701	Telephone No. 432-230-0077
Facility Name: OWL 20504 JV-P #005	Facility Type: SWD

Surface Owner: Federal	Mineral Owner: Federal	API No. 30-015-35435
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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
J	18	26S	27E	2310	South	2310	East	Eddy

Latitude 32.0414886 Longitude - 104.2282181

NATURE OF RELEASE

Type of Release: Oil & Produced Water	Volume of Release: 100 bbls Oil ; 510 bbls PW	Volume Recovered: 90 bbls Oil ; 500 bbls PW
Source of Release: Tank Overflow	Date and Hour of Occurrence: 6/24/2015 11:00 am	Date and Hour of Discovery: 6/24/2015 11:00 am
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Mike Bratcher – NMOCD / Jim Amos – BLM	
By Whom? Amanda Trujillo	Date and Hour: Fri 6/26/2015 2:33 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.*

This release was caused by a tank overflow due to an issue with the transducer valves. Vacuum trucks were dispatched to recover all standing fluid.

Describe Area Affected and Cleanup Action Taken.*

This release over ran the lined bermed area but remained on location. An initial scrape was completed. 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: 	<u>OIL CONSERVATION DIVISION</u>		
Printed Name: Amanda Trujillo	Approved by Environmental Specialist:		
Title: Senior Environmental Coordinator	Approval Date:	Expiration Date:	
E-mail Address: atrujillo@concho.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: July 8, 2015	Phone: 575-748-6940		

* Attach Additional Sheets If Necessary

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.

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OPERATOR

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Surface Owner: Federal	Mineral Owner: Federal	API No. 30-015-35435
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LOCATION OF RELEASE

Unit Letter J	Section 18	Township 26S	Range 27E	Feet from the 2310	North/South Line South	Feet from the 2310	East/West Line East	County Eddy
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Latitude 32.0414886 Longitude - 104.2282181

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Signature: 		<u>OIL CONSERVATION DIVISION</u>	
Printed Name: Lupe Carrasco		Approved by Environmental Specialist:	
Title: Environmental Coordinator		Approval Date:	Expiration Date:
E-mail Address: gcarrasco@concho.com		Conditions of Approval:	Attached <input type="checkbox"/>
Date: August 3, 2015 Phone: 575-748-6940			

* Attach Additional Sheets If Necessary