



Lupe Carrasco
Environmental Coordinator

October 23, 2015

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

Re: Electra Federal 33 Tank Battery
30-015-36468
Sec. 10, T17S-R30E
Eddy County, NM

Mr. Mike Bratcher,

COG Operating LLC would like to submit for your consideration the enclosed work plan for the above captioned well. The plan is in response to the C-141 initial report dated September 4, 2015.

Background

The release was caused by a lightning strike with all fluid contained within the bermed facility. The release resulted in 1 barrel of oil and 170 barrels of produced water released with an estimated recovery of 1 barrel of oil and 170 barrels of produced water. Once all possible fluid was recovered, the impacted area was immediately excavated to a depth of approximately 6”.

Groundwater

Based on the Chevron Trend Maps, the release area would be classified at a site ranking of **Zero** due to the depth of groundwater at greater than 300’.

Soil Assessment and Analytical Results

Initial soil samples were taken on September 22, 2015, with the results and approximate locations depicted on the attached Site Diagram as S1 and S2. S1 was chosen directly behind the tanks with S2 chosen in the lower portion of the battery where all the fluid accumulated. Sample results are as follows:

S1	BTEX	GRO	DRO	TPH	Cl-
1'	ND	ND	ND	ND	18000
2'					1740
3'					32
4'					64
S2	BTEX	GRO	DRO	TPH	Cl-
1'	ND	ND	ND	ND	14440
2'					144
3'					112

Sample results indicate that TPH and BTEX are non-detect for both sample points at a depth of 1'. Chloride results indicate that levels are elevated to a depth of 2' for S1 and 1' for S2. Analytical Results are attached for your consideration.

Work Plan

COG Operating LLC proposes the following remediation plan:

- **S1:** Excavate to a total depth of 2.5 feet and backfill with like material.
- **S2:** Excavate to a total depth of 1.5 feet and backfill with like material

The depths proposed include the 6 inches of excavated material prior to sampling. All impacted material excavated will be hauled to an approved NMOCD facility for disposal.

If there are no objections or further stipulations, COG Operating LLC would like to begin the remediation process based on approval of this work plan. Please feel free to contact me with any questions or concerns at (575) 748-6933.

Sincerely,



Lupe Carrasco
Environmental Coordinator

Enclosed:

- (1) Site Diagram and Summary Table
- (2) Laboratory Analysis
- (3) C-141 Initial (copy)

Electra Federal 33 Tank Battery

August 21, 2015

Section 10, T17S-R30E

32.85309,-103.95808

Legend

Release Area

Electra Federal 33 Tank Battery

S1	BTEX	GRO	DRO	TPH	CI-
1'	ND	ND	ND	ND	18000
2'					1740
3'					32
4'					64
S2	BTEX	GRO	DRO	TPH	CI-
1'	ND	ND	ND	ND	14440
2'					144
3'					112

Google earth

CONCHO



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

September 29, 2015

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

RE: ELECTRA FEDERAL BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 09/23/15 14:38.

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: 09/23/2015
Reported: 09/29/2015
Project Name: ELECTRA FEDERAL BATTERY
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 09/22/2015
Sampling Type: Soil
Sampling Condition: ** (See Notes)
Sample Received By: Judy Garcia

Sample ID: S1-1' (H502523-01)

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	09/28/2015	ND	2.04	102	2.00	2.21	
Toluene*	<0.050	0.050	09/28/2015	ND	1.75	87.4	2.00	1.79	
Ethylbenzene*	<0.050	0.050	09/28/2015	ND	1.67	83.5	2.00	1.51	
Total Xylenes*	<0.150	0.150	09/28/2015	ND	5.37	89.5	6.00	1.51	
Total BTEX	<0.300	0.300	09/28/2015	ND					

Surrogate: 4-Bromofluorobenzene (PIL) 108 % 85.6-137

Chloride, SM4500CI-B			mg/kg		Analyzed By: CK				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	18000	16.0	09/26/2015	ND	432	108	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	09/25/2015	ND	186	92.8	200	4.70	
DRO >C10-C28	<10.0	10.0	09/25/2015	ND	197	98.6	200	3.89	

Surrogate: 1-Chlorooctane 84.5 % 47.2-157

Surrogate: 1-Chlorooctadecane 94.3 % 52.1-176

Sample ID: S1-2' (H502523-02)

Chloride, SM4500CI-B			mg/kg		Analyzed By: CK				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1740	16.0	09/26/2015	ND	432	108	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: 09/23/2015
Reported: 09/29/2015
Project Name: ELECTRA FEDERAL BATTERY
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 09/22/2015
Sampling Type: Soil
Sampling Condition: ** (See Notes)
Sample Received By: Judy Garcia

Sample ID: S1-3' (H502523-03)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	09/26/2015	ND	432	108	400	0.00	

Sample ID: S1-4' (H502523-04)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	09/26/2015	ND	432	108	400	0.00	

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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: 09/23/2015
Reported: 09/29/2015
Project Name: ELECTRA FEDERAL BATTERY
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 09/22/2015
Sampling Type: Soil
Sampling Condition: ** (See Notes)
Sample Received By: Judy Garcia

Sample ID: S2-1' (H502523-05)

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	09/28/2015	ND	2.04	102	2.00	2.21	
Toluene*	<0.050	0.050	09/28/2015	ND	1.75	87.4	2.00	1.79	
Ethylbenzene*	<0.050	0.050	09/28/2015	ND	1.67	83.5	2.00	1.51	
Total Xylenes*	<0.150	0.150	09/28/2015	ND	5.37	89.5	6.00	1.51	
Total BTEX	<0.300	0.300	09/28/2015	ND					

Surrogate: 4-Bromofluorobenzene (PIE) 106 % 85.6-137

Chloride, SM4500Cl-B			mg/kg		Analyzed By: CK				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	14400	16.0	09/26/2015	ND	432	108	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	09/25/2015	ND	186	92.8	200	4.70	
DRO >C10-C28	<10.0	10.0	09/25/2015	ND	197	98.6	200	3.89	

Surrogate: 1-Chlorooctane 116 % 47.2-157

Surrogate: 1-Chlorooctadecane 135 % 52.1-176

Sample ID: S2-2' (H502523-06)

Chloride, SM4500Cl-B			mg/kg		Analyzed By: CK				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	144	16.0	09/26/2015	ND	432	108	400	0.00	

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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: 09/23/2015
Reported: 09/29/2015
Project Name: ELECTRA FEDERAL BATTERY
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 09/22/2015
Sampling Type: Soil
Sampling Condition: ** (See Notes)
Sample Received By: Judy Garcia

Sample ID: S2-3' (H502523-07)**Chloride, SM4500Cl-B****mg/kg****Analyzed By: CK**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	112	16.0	09/26/2015	ND	432	108	400	0.00	

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* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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

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Celey D. Keene, Lab Director/Quality Manager



ANALYSIS REQUEST

[illegible]

#54

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: Electra Federal 33 Tank Battery	Facility Type: Battery

Surface Owner: Federal	Mineral Owner: Federal	API No.
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LOCATION OF RELEASE

Unit Letter B	Section 10	Township 17S	Range 30E	Feet from the	North/South Line	Feet from the	East/West Line	County Eddy
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Latitude 32.85309 Longitude 103.95906

NATURE OF RELEASE

Type of Release: Oil & Produced Water	Volume of Release: 1 bbls Oil ; 170 bbls PW	Volume Recovered: 1 bbls Oil ; 170 bbls PW
Source of Release: Lightning Strike	Date and Hour of Occurrence: 8/21/2015 12:00 am	Date and Hour of Discovery: 8/21/2015 12:00 am
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input 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 lightning strike. Vacuum trucks were dispatched and recovered PW was sent to a public disposal.

Describe Area Affected and Cleanup Action Taken.*

This release was contained with the bermed area of the facility. 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.

OIL CONSERVATION DIVISION

Signature:



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 ☐

Date: 9/4/2015 Phone: 575-748-6940

* Attach Additional Sheets If Necessary