

January 11, 2016

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

**Re: BKU Central Tank Battery SWD
Sec. 24, T17S-R29E
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 August 20, 2015.

Background

The release was due to an alarm failure causing the tanks to overflow resulting in the release of 20 barrels of oil and 580 barrels of produced water. The majority of the fluid released was contained within the lined facility of which 10 barrels of oil and 560 barrels of produced water were recovered. The produced water that overflowed the containment impacted the pad, the northside of the lease road, a two track road that ran across a nearby pasture, and a portion of the pad associated with the BKU #315. The attached diagram depicts the area impacted along with approximate sample points.

Groundwater

Based on the information obtained through the use of the Chevron-Texaco Maps, the release area would be classified at a site ranking of **Zero** with depth to groundwater at greater than 175'.

Soil Assessment and Analytical Results

Sample points were chosen based on proximity to buried hazards such as electrical lines and pipelines as well as overhead powerlines. Below is a summary of the attached analytical results:

S1	Cl-
1'	64
2'	32
3'	64
S2	Cl-
1'	2400
2'	9060
3'	4000
4'	1540
6'	1150
8'	1250
S3	Cl-
1'	16
2'	ND

Work Plan

COG Operating LLC proposes that the no excavation be required for the impacted area on the lease road and the pad due to the associated safety hazards with buried electrical lines, gas pipelines, and produced water lines. These hazards pose a high safety concern with respect to sampling and excavation. At a site ranking of Zero, any chlorides found on this location from this release or historic releases pose no threat to ground water. The area labeled as S2 would be excavated no greater than a depth of 3' and field titrations will be used to further delineate the area. The area associated with the pipeline right of way (between S1 & S2) would be treated as a minor scrape and any work perform in this area will be done under the supervision of a representative for the respective pipeline. The area labeled as S3 should require no further excavation. An initial scrape was performed in this area upon discovery of the release.

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

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

August 20, 2015

BKU Central Tank Battery SWD

Sec. 24, T17S-R29E

S1	Cl-
1'	64
2'	32
3'	64
S2	Cl-
1'	2400
2'	9060
3'	4000
4'	1540
6'	1150
8'	1250
S3	Cl-
1'	16
2'	ND

Legend
Release Area



November 09, 2015

LUPE CARRASCO
COG OPERATING
P. O. BOX 1630
ARTESIA, NM 88210

RE: BKU CENTRAL TANK BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 10/28/15 11:30.

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,



Caley D. Keene
Lab Director/Quality Manager

Analytical Results For:

COG OPERATING
LUPE CARRASCO
P. O. BOX 1630
ARTESIA NM, 88210
Fax To: NONE

Received: 10/28/2015
Reported: 11/09/2015
Project Name: BKU CENTRAL TANK BATTERY
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 10/21/2015
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Judy Garcia

Sample ID: S1-1' (H502823-01)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	11/03/2015	ND	432	108	400	7.69	

Sample ID: S1-2' (H502823-02)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	11/03/2015	ND	432	108	400	7.69	

Sample ID: S1-3' (H502823-03)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	11/03/2015	ND	432	108	400	7.69	

Sample ID: S2-1' (H502823-06)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	2400	16.0	11/03/2015	ND	432	108	400	7.69	

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

 COG OPERATING
 LUPE CARRASCO
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

 Received: 10/28/2015
 Reported: 11/09/2015
 Project Name: BKU CENTRAL TANK BATTERY
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 10/21/2015
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Judy Garcia

Sample ID: S2-2' (H502823-07)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	9060	16.0	11/03/2015	ND	432	108	400	7.69	

Sample ID: S2-3' (H502823-08)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	4000	16.0	11/03/2015	ND	432	108	400	7.69	

Sample ID: S2-4' (H502823-09)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1540	16.0	11/04/2015	ND	416	104	400	0.00	

Sample ID: S2-6' (H502823-10)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1150	16.0	11/06/2015	ND	400	100	400	0.00	

Sample ID: S2-8' (H502823-11)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1250	16.0	11/09/2015	ND	400	100	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
LUPE CARRASCO
P. O. BOX 1630
ARTESIA NM, 88210
Fax To: NONEReceived: 10/28/2015
Reported: 11/09/2015
Project Name: BKU CENTRAL TANK BATTERY
Project Number: NONE GIVEN
Project Location: NOT GIVENSampling Date: 10/21/2015
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Judy Garcia**Sample ID: S3-1' (H502823-12)**

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	11/03/2015	ND	432	108	400	7.69	

Sample ID: S3-2' (H502823-13)

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	11/03/2015	ND	432	108	400	7.69	

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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



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



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† 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**

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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: BKU Central Tank Battery SWD	Facility Type: Facility	
Surface Owner: Fee	Mineral Owner: Fee	API No. N/A

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
J	24	17S	29E	N/A	N/A	N/A	N/A	Eddy

Latitude N32° 49.180 Longitude W104° 01.569

NATURE OF RELEASE

Type of Release: Oil & Produced Water	Volume of Release: 20 bbls oil & 580 bbls PW	Volume Recovered: 10 bbls oil & 560 bbls PW
Source of Release: Tank Overflow	Date and Hour of Occurrence: 8/20/2015 6:30 am	Date and Hour of Discovery: 8/20/2015 6:30 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 – OCD	
By Whom? Amanda Trujillo	Date and Hour: Fri 8/21/2015 5:15 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 when tanks overflowed due to an alarm failure. Vacuum trucks were dispatched to recover all standing fluid.

Describe Area Affected and Cleanup Action Taken.*

This release occurred in within containment then overfilled the containment and impacted the pad and nearby pasture. 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: 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: August 2, 2015 Phone: 575-748-6940		

* Attach Additional Sheets If Necessary