

January 11, 2016

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

**Re: West Brushy 8 Federal SWD #1**  
**30-015-31675**  
**Sec. 8, T26S-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 September 13, 2015.

### **Background**

The release was caused by a poly flow line that was damaged by crews working in the area resulting in the estimated release of 30 barrels of produced water of which 3 barrels were recovered. The release misted out of the flow line and the attached site diagram depicts the approximate area impacted (100' x 100'). The impacted area consists of several surface flow lines and several buried high pressure gas lines along with a produced water line and overhead power lines. The buried gas lines pertain to the neighboring compressor station and form a highly sensitive area in respect to potential safety hazards.

### **Groundwater**

Based on the Chevron Trend Maps, the release area would be classified at a site ranking of Zero with depth to groundwater at greater than 100'. The information obtained through the New Mexico Office of the State Engineer shows the average depth to ground water at ~75 feet for a well drilled in Unit M of Section 5 which is on the west side of the river and 1 mile west of the release area classifying the area at a site ranking of Ten.

### **Soil Assessment and Analytical Results**

Sample points noted on the attached Site Diagram were taken with a hand auger and were only taken to a depth of 1' due to the unknown depth of the buried gas lines and the

lack of representation from the respective gas companies at the time of sampling. Below is a summary of the analytical results:

S1	Cl-
S	528
1'	4000
S2	Cl-
S	2930
1'	304
S3	Cl-
S	2130
1'	4240

### Work Plan

COG Operating LLC proposes that no excavation other than a surface scrape be required due to the high risk hazards in the area. The area consists of three high pressure gas lines associated with the neighboring compressor station, a water line, a crude oil line that runs east and west, and overhead power lines. At a site ranking of Zero with depth to ground water at greater than 100', chlorides left in place pose no threat to ground water.

If there are no objections, COG Operating LLC will submit for closure based on approval of this work plan. Please feel free to contact me with any questions or concerns at (575) 689-3100.

Sincerely,



Lupe Carrasco  
Environmental Coordinator

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



September 15, 2015

# West Brushy 8 SWD #1

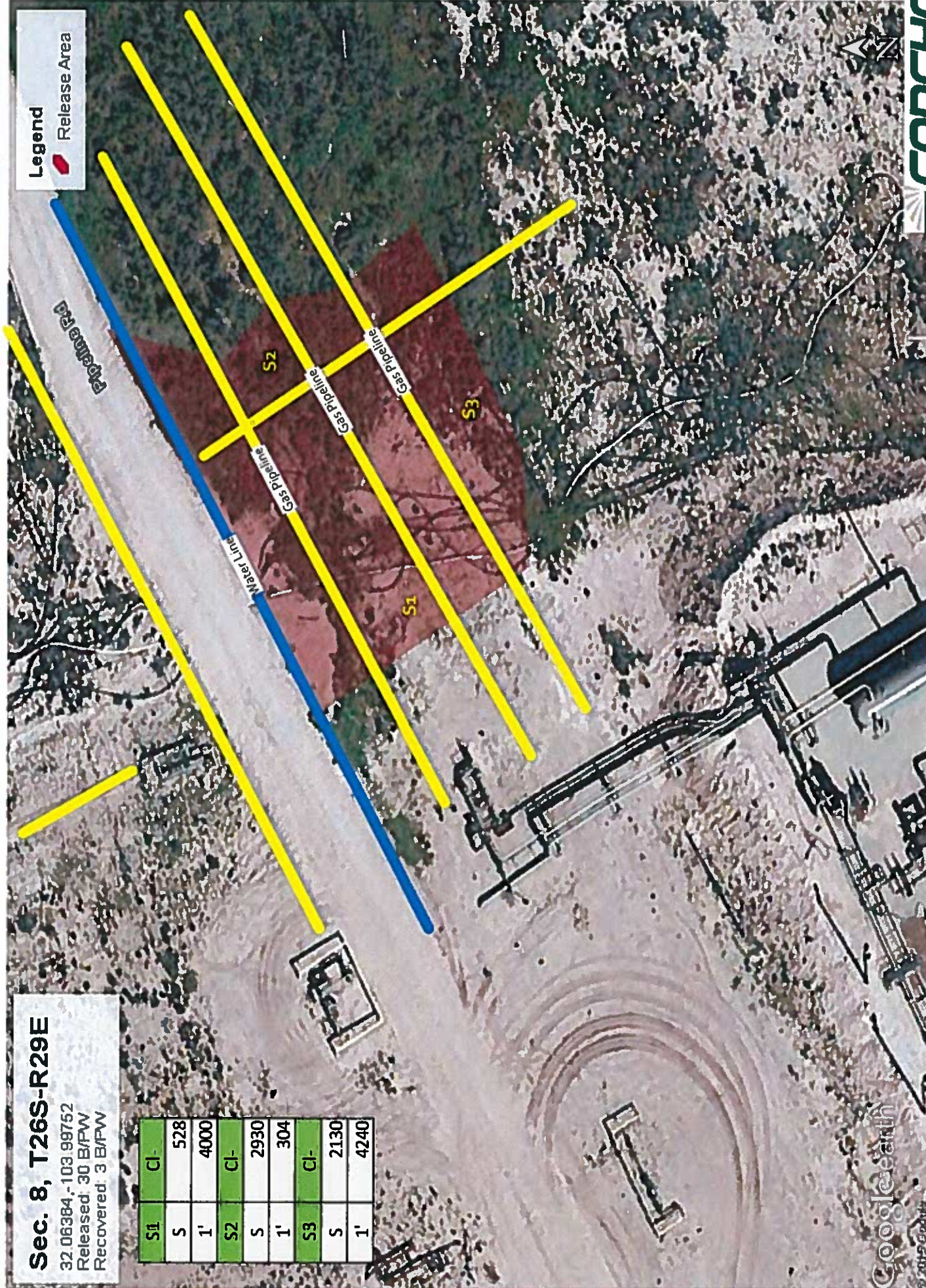
## Sec. 8, T26S-R29E

32 06384.-103 99752  
Released: 30 B/PW  
Recovered: 3 B/PW

S1	CI-	
S	528	
1'	4000	
S2	CI-	
S	2930	
1'	304	
S3	CI-	
S	2130	
1'	4240	

### Legend

Release Area



Google Earth





October 23, 2015

LUPE CARRASCO

COG OPERATING

P. O. BOX 1630

ARTESIA, NM 88210

RE: WEST BRUSHY

Enclosed are the results of analyses for samples received by the laboratory on 10/21/15 15:13.

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](http://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  
LUPE CARRASCO  
P. O. BOX 1630  
ARTESIA NM, 88210  
Fax To: NONEReceived: 10/21/2015  
Reported: 10/23/2015  
Project Name: WEST BRUSHY  
Project Number: NONE GIVEN  
Project Location: NOT GIVENSampling Date: 10/15/2015  
Sampling Type: Soil  
Sampling Condition: \*\* (See Notes)  
Sample Received By: Judy Garcia**Sample ID: S1-S (H502750-01)**

Chloride, SM4500Cl-B			mg/kg		Analyzed By: AP				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	528	16.0	10/23/2015	ND	432	108	400	3.77	

**Sample ID: S1-1' (H502750-02)**

Chloride, SM4500Cl-B			mg/kg		Analyzed By: AP				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	4000	16.0	10/23/2015	ND	432	108	400	3.77	

**Sample ID: S2-S (H502750-03)**

Chloride, SM4500Cl-B			mg/kg		Analyzed By: AP				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	2930	16.0	10/23/2015	ND	432	108	400	3.77	

**Sample ID: S2-1' (H502750-04)**

Chloride, SM4500Cl-B			mg/kg		Analyzed By: AP				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	304	16.0	10/23/2015	ND	432	108	400	3.77	

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: 10/21/2015  
Reported: 10/23/2015  
Project Name: WEST BRUSHY  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 10/15/2015  
Sampling Type: Soil  
Sampling Condition: \*\* (See Notes)  
Sample Received By: Judy Garcia

**Sample ID: S3-S (H502750-05)**

Chloride, SM4500Cl-B		mg/kg	Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	2130	16.0	10/23/2015	ND	432	108	400	3.77	

**Sample ID: S3-1' (H502750-06)**

Chloride, SM4500Cl-B		mg/kg	Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	4240	16.0	10/23/2015	ND	432	108	400	3.77	

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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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\* = Accredited Analyte

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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

Company Name: COG Operating LLC

Project Manager: Lupe Carrasco

Address: 2208 West Main

City: Artesia

Phone #: (575) 748-6940

Project #:

Project Name: West Brushy

Project Location:

Sampler Name: Lupe Carrasco

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		MATRIX		PRESERV		SAMPLING		DATE		TIME		BTEX		TPH		Chloride	
	S1-S		X																				
	S1-1'		X																				
	S2-S		X																				
	S2-1'		X																				
	S3-S		X																				
	S3-1'		X																				

PLEASE NOTE: Liability and Damages. Cardinal's liability and claims are limited to the amount paid by the client for the analysis. All claims, including those for negligence and any other claims whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the analysis. Service. In no event shall Cardinal be held liable for excluded 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 provided by Cardinal. Cardinal warrants that the analysis was performed in accordance with the above stated procedures and standards.

Relinquished By:

*Lupe Carrasco*

Date: 10/24/15  
Time: 15:13

Received By:

*Judy Garcia*

Date: 10/24/15  
Time: 15:13

Received By:

*Judy Garcia*

Sample Condition  
Cool (check)  
☐ Yes ☐ No

CHECKED BY:  
(initials)  
*JG*

FORM-008 R2.0

Phone Result: ☐ Yes ☐ No Add'l Phone #:  
Fax Result: ☐ Yes ☐ No Add'l Fax #:  
REMARKS: [jccarrasco@concho.com](mailto:jccarrasco@concho.com)  
[atrujillo@concho.com](mailto:atrujillo@concho.com)

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

#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: West Brushy 8 Federal SWD #1	Facility Type: SWD	
Surface Owner: Federal	Mineral Owner: Federal	API No. 30-015-31675

**LOCATION OF RELEASE**

Unit Letter A	Section 8	Township 26S	Range 29E	Feet from the 660	North/South Line North	Feet from the 330	East/West Line East	County Eddy
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Latitude 32.0625249053514 Longitude -103.99867482237

**NATURE OF RELEASE**

Type of Release: Produced Water	Volume of Release: 30 bbls	Volume Recovered: 3 bbls
Source of Release: Poly Flowline	Date and Hour of Occurrence: 9/13/2015 3:00 pm	Date and Hour of Discovery: 9/13/2015 3:00 pm
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 / James Amos – BLM	
By Whom? Amanda Trujillo	Date and Hour: Tue 9/15/2015 6:05 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 poly flowline damaged by a crew working in the area. Vacuum truck trucks were dispatched to remove all standing fluid.		
Describe Area Affected and Cleanup Action Taken.* The impacted area is located in the pasture alongside the road. 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: 	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Amanda Trujillo Davis	Approved by Environmental Specialist:	
Title: Senior Environmental Coordinator	Approval Date:	Expiration Date:
E-mail Address: <a href="mailto:atrujillo@concho.com">atrujillo@concho.com</a>	Conditions of Approval:	Attached <input type="checkbox"/>
Date: October 24, 2015 Phone: 575-748-6940		

\* Attach Additional Sheets If Necessary