



Robert Grubbs Jr.
Senior Environmental Coordinator

January 27, 2016

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

Re: Crossman 25 State #1
30-15-38948
Sec. 24, T25S-R27E
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 October 20, 2014.

Background

The release was caused by torrential rains that resulted in mass flooding. Flood waters washed tanks, debris, and pad material downstream. 280 bbls of oil and 100 bbls of produced water were lost and unrecoverable. GL Environmental Inc. (GLE) was contracted by the State Land Office to complete a site survey combined with a sampling and analysis effort of the affected portions of the draw. GLE identified one sample with elevated chloride concentrations on the pad through composite sampling of 3 discrete samples.

After discussions with OCD, COG conducted additional sampling on October 14, 2015 to further identify the areas of contamination at sample point 5 with discrete samples. (See attached map)

Soil Assessment and Analytical Results

The pad area was divided into 4 quadrants for sampling purposes. Chloride concentrations were elevated in one of the sampling area (T-3) which was above the NMOCD's target of 1,000 mg/kg for the remediation of chlorides (see attached site diagram).

CORPORATE ADDRESS

One Concho Center | 600 West Illinois Avenue | Midland, Texas 79701
PHONE 432.683.7443 | FAX 432.683.7441

LOCAL ADDRESS

Concho West | 2208 Main Street | Artesia, New Mexico 88210
PHONE 575.748.6940 | FAX 575.746.2096

Work Plan

COG proposes the following excavations:

T1 – No Excavation

T2 – No Excavation

T3 – Excavate 1'

T4 – No Excavation

T5 – No Excavation

On January 21, 2016, COG met with Bradford Billings, Mike Bratcher and Heather Patterson in the Artesia, OCD District 2 office to discuss samples results and closure of this site. At this meeting, it was decided to install a temporary well in the vicinity of the T-5 location. A water sample will be collected from the temporary well and a surface water sample will be collected immediately upstream of the pad location. It was agreed that if these 2 water samples exhibit similar chloride ranges, the only remaining action is to remove approximately 1 ft. of soil in the vicinity of the T-3 sample location. The OCD will be notified 48 hrs. prior to the installation of the temporary well. The temporary well will be installed and properly developed, and allowed to stand 24 hrs. prior to sample collection. The water samples from the temporary well and the adjacent surface water will be collected at the same time.

After the water sample results are received, the results will be forwarded to the OCD for approval, and once approved, the temporary well will be properly plugged. Upon approval of the final work, a C-141 Final Closure will be submitted to the OCD.

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 (432) 661-6601.

Sincerely,

Robert Grubbs Jr.

Senior Environmental Coordinator

Enclosed

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

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: Crossman 25 State #1H	Facility Type: Battery

Surface Owner: Federal	Mineral Owner: Federal	API No. 30-015-38948
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LOCATION OF RELEASE

Unit Letter A	Section 25	Township 25S	Range 27E	Feet from the 330'	North/South Line North	Feet from the 330'	East/West Line East	County Eddy
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Latitude 32.1073265861973 Longitude -104.136404581729

NATURE OF RELEASE

Type of Release: Oil and Produced Water	Volume of Release: 280 bbls Oil ; 100 bbls PW	Volume Recovered: 0 bbls Oil ; 0 bbls PW
Source of Release: Flood waters washed battery away.	Date and Hour of Occurrence: 9/19/2014 11:00 am	Date and Hour of Discovery: 9/19/2014 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 – OCD	
By Whom? Robert McNeill	Date and Hour: 9/22/2014 8:00 am (phone call)	
Was a Watercourse Reached? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, Volume Impacting the Watercourse. Unknown	

If a Watercourse was Impacted, Describe Fully.*


Torrential rains caused flood waters to rise. Waters over ran the location, taking tanks and equipment away with the water. Most of the pad was taken away with the flood waters as well. Tanks and equipment was located approximately 2 miles further down the arroyo. The steel tanks were empty and the fiberglass tanks were torn apart.

Describe Cause of Problem and Remedial Action Taken.*

Describe Area Affected and Cleanup Action Taken.*

The impacted area shows no signs of hydrocarbon or brine impact. Once the area dries out and is accessible to heavy equipment we will conduct a more thorough search of the area for hydrocarbon impact. Equipment will be removed from the draw and disposed of at an NMOCD approved facility.

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: October 20, 2014	Phone: 575-748-6940		

* Attach Additional Sheets If Necessary

Crossman 25 State #1



- Legend**
- 30° - 36° Perimeter Earthen Berm
 - CrossMan
 - Pad Edge
 - Proposed Area of Excavation
 - Sample Point
 - Temp Well

T1	DRO	CI-
0-1'	<50.0	490
2	<50.0	490
4	<50.0	196
6'	<50.0	196
8'	<50.0	392
10'	<50.0	94
T2	DRO	CI-
0-1'	<50.0	1970
2	<50.0	939
4	<50.0	751
6'	<50.0	563
8'	<50.0	188
10'	<50.0	94
T3	DRO	CI-
0-1'	<50.0	11,000
2	<50.0	1690
4	<50.0	282
6'	<50.0	190
8'	<50.0	397
10'	<50.0	<20
T4	DRO	CI-
0-1'	<50.0	474
2	<50.0	190
4'	<50.0	664
6'	<50.0	474
8'	<50.0	95
10'	<50.0	<20
T5	DRO	CI-
2	-	3400
4'	-	2360
6'	-	1510
8'	-	1600
10'	-	1980
12'	-	571

Bold values exceed RRALs

Summary Report

Robert Grubbs
COG Operating, LLC
550 W. Texas Avenue
Suite 100
Midland, TX 79701

Report Date: September 10, 2015

Work Order: 15082118



Project Location: Eddy Co, NM
Project Name: Crossman 25 State

Sample	Description	Matrix	Date Taken	Time Taken	Date Received
402936	T-1 0-1'	soil	2015-08-19	00:00	2015-08-21
402937	T-1 2'	soil	2015-08-19	00:00	2015-08-21
402938	T-1 4'	soil	2015-08-19	00:00	2015-08-21
402939	T-1 6'	soil	2015-08-19	00:00	2015-08-21
402940	T-1 8'	soil	2015-08-19	00:00	2015-08-21
402941	T-1 10'	soil	2015-08-19	00:00	2015-08-21
402942	T-2 0-1'	soil	2015-08-19	00:00	2015-08-21
402943	T-2 2'	soil	2015-08-19	00:00	2015-08-21
402944	T-2 4'	soil	2015-08-19	00:00	2015-08-21
402945	T-2 6'	soil	2015-08-19	00:00	2015-08-21
402946	T-2 8'	soil	2015-08-19	00:00	2015-08-21
402947	T-2 10'	soil	2015-08-19	00:00	2015-08-21
402948	T-3 0-1'	soil	2015-08-19	00:00	2015-08-21
402949	T-3 2'	soil	2015-08-19	00:00	2015-08-21
402950	T-3 4'	soil	2015-08-19	00:00	2015-08-21
402951	T-3 6'	soil	2015-08-19	00:00	2015-08-21
402952	T-3 8'	soil	2015-08-19	00:00	2015-08-21
402953	T-3 10'	soil	2015-08-19	00:00	2015-08-21
402954	T-4 0-1'	soil	2015-08-19	00:00	2015-08-21
402955	T-4 2'	soil	2015-08-19	00:00	2015-08-21
402956	T-4 4'	soil	2015-08-19	00:00	2015-08-21
402957	T-4 6'	soil	2015-08-19	00:00	2015-08-21
402958	T-4 8'	soil	2015-08-19	00:00	2015-08-21
402959	T-4 10'	soil	2015-08-19	00:00	2015-08-21

Sample - Field Code	TPH DRO DRO (mg/Kg)	TPH GRO GRO (mg/Kg)
402936 - T-1 0-1'	<50.0 B,Qr	<4.00
402937 - T-1 2'	<50.0 B,Qr	<4.00
402938 - T-1 4'	<50.0 B,Qr	<4.00
402939 - T-1 6'	<50.0 B,Qr	<4.00
402940 - T-1 8'	<50.0 B,Qr	<4.00
402941 - T-1 10'	<50.0 B	<4.00
402942 - T-2 0-1'	<50.0 B	<4.00
402943 - T-2 2'	<50.0 B	<4.00
402944 - T-2 4'	<50.0 B	<4.00
402945 - T-2 6'	<50.0 B	<4.00
402946 - T-2 8'	<50.0 B	<4.00
402947 - T-2 10'	<50.0 B	<4.00
402948 - T-3 0-1'	<50.0 B	<4.00
402949 - T-3 2'	<50.0 B	<4.00
402950 - T-3 4'	<50.0 B	<4.00
402951 - T-3 6'	<50.0 B	<4.00
402952 - T-3 8'	<50.0 B	<4.00
402953 - T-3 10'	<50.0 B	<4.00
402954 - T-4 0-1'	<50.0 B	<4.00
402955 - T-4 2'	<50.0 B	<4.00
402956 - T-4 4'	<50.0 B	<4.00
402957 - T-4 6'	<50.0 B	<4.00
402958 - T-4 8'	<50.0 B	<4.00
402959 - T-4 10'	<50.0 B	<4.00

Sample: 402936 - T-1 0-1'

Param	Flag	Result	Units	RL
Chloride		490	mg/Kg	4

Sample: 402937 - T-1 2'

Param	Flag	Result	Units	RL
Chloride		490	mg/Kg	4

Sample: 402938 - T-1 4'

Param	Flag	Result	Units	RL
Chloride		196	mg/Kg	4

Sample: 402939 - T-1 6'

Param	Flag	Result	Units	RL
Chloride		196	mg/Kg	4

Sample: 402940 - T-1 8'

Param	Flag	Result	Units	RL
Chloride		392	mg/Kg	4

Sample: 402941 - T-1 10'

Param	Flag	Result	Units	RL
Chloride		94.0	mg/Kg	4

Sample: 402942 - T-2 0-1'

Param	Flag	Result	Units	RL
Chloride		1970	mg/Kg	4

Sample: 402943 - T-2 2'

Param	Flag	Result	Units	RL
Chloride		939	mg/Kg	4

Sample: 402944 - T-2 4'

Param	Flag	Result	Units	RL
Chloride		751	mg/Kg	4

Sample: 402945 - T-2 6'

Param	Flag	Result	Units	RL
Chloride		563	mg/Kg	4

Sample: 402946 - T-2 8'

Param	Flag	Result	Units	RL
Chloride		188	mg/Kg	4

Sample: 402947 - T-2 10'

Param	Flag	Result	Units	RL
Chloride		94.0	mg/Kg	4

Sample: 402948 - T-3 0-1'

Param	Flag	Result	Units	RL
Chloride		11000	mg/Kg	4

Sample: 402949 - T-3 2'

Param	Flag	Result	Units	RL
Chloride		1690	mg/Kg	4

Sample: 402950 - T-3 4'

Param	Flag	Result	Units	RL
Chloride		282	mg/Kg	4

Sample: 402951 - T-3 6'

Param	Flag	Result	Units	RL
Chloride		190	mg/Kg	4

Sample: 402952 - T-3 8'

Param	Flag	Result	Units	RL
Chloride		379	mg/Kg	4

Sample: 402953 - T-3 10'

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

Sample: 402954 - T-4 0-1'

Param	Flag	Result	Units	RL
Chloride		474	mg/Kg	4

Sample: 402955 - T-4 2'

Param	Flag	Result	Units	RL
Chloride		190	mg/Kg	4

Sample: 402956 - T-4 4'

Param	Flag	Result	Units	RL
Chloride		664	mg/Kg	4

Sample: 402957 - T-4 6'

Param	Flag	Result	Units	RL
Chloride		474	mg/Kg	4

Sample: 402958 - T-4 8'

Param	Flag	Result	Units	RL
Chloride		95.0	mg/Kg	4

Sample: 402959 - T-4 10'

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

Summary Report

Robert Grubbs
COG Operating, LLC
550 W. Texas Avenue
Suite 100
Midland, TX 79701

Report Date: October 16, 2015

Work Order: 15101536



Project Location: Eddy Co, NM
Project Name: Crossman 25 State #1H
Project Number: ENV015.0002.1

Sample	Description	Matrix	Date Taken	Time Taken	Date Received
406502	T-5 2'	soil	2015-10-14	00:00	2015-10-15
406503	T-5 4'	soil	2015-10-14	00:00	2015-10-15
406504	T-5 6'	soil	2015-10-14	00:00	2015-10-15
406505	T-5 8'	soil	2015-10-14	00:00	2015-10-15
406506	T-5 10'	soil	2015-10-14	00:00	2015-10-15

Sample: 406502 - T-5 2'

Param	Flag	Result	Units	RL
Chloride		3400	mg/Kg	4

Sample: 406503 - T-5 4'

Param	Flag	Result	Units	RL
Chloride		2360	mg/Kg	4

Sample: 406504 - T-5 6'

Param	Flag	Result	Units	RL
Chloride		1510	mg/Kg	4

Sample: 406505 - T-5 8'

Param	Flag	Result	Units	RL
Chloride		1600	mg/Kg	4

Sample: 406506 - T-5 10'

Param	Flag	Result	Units	RL
Chloride		1980	mg/Kg	4

Summary Report

Robert Grubbs
COG Operating, LLC
550 W. Texas Avenue
Suite 100
Midland, TX 79701

Report Date: November 30, 2015

Work Order: 15112507



Project Location: Eddy Co, NM
Project Name: Crossman 25 State #1H
Project Number: ENV015.0002.1

Sample	Description	Matrix	Date Taken	Time Taken	Date Received
409061	T-5 10'	soil	2015-11-24	00:00	2015-11-25
409062	T-5 12'	soil	2015-11-24	00:00	2015-11-25

Sample: 409061 - T-5 10'

Param	Flag	Result	Units	RL
Chloride		667	mg/Kg	50

Sample: 409062 - T-5 12'

Param	Flag	Result	Units	RL
Chloride		571	mg/Kg	50

