



December 6, 2017

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

Henryetta Price
Bureau of Land Management
620 E. Green St.
Carlsbad, NM 88220

**Re: Closure Request Letter
Airbus Federal #001 (2RP-3828)
Unit Letter L, Section 12, Township 19S, Range 31E
Eddy County, NM**

Mr. Bratcher/Ms. Price,

COG Operating LLC is pleased to submit for your consideration the following Closure Request for the Airbus Federal #1 Tank Battery. This Closure Request Letter is in response to a crude oil release that occurred on August 9, 2016. Subsequent to the release a C-141 Initial report was submitted to the New Mexico Oil Conservation Division (NMOCD) and Bureau of Land Management (BLM) on August 12, 2016 (2RP-3828).

BACKGROUND

On August 9, 2016, a release was discovered at the Airbus Federal #001 Tank Battery. The release was thought to have been due to lightning hitting a water tank. No fire was reported. The majority of the release remained within the lined berm with a light overspray in the adjacent pasture. A vacuum truck was dispatched to remove any standing fluids from within the bermed area. The event resulted in the release of approximately fourteen (14) barrels (bbl.) of oil and fifty-two (52) bbl. of produced water. Initially it was reported that approximately three (3) bbl. of oil and twenty (20) bbl. of produced water was recovered. The remaining fluids were recovered during caliche and gravel removal.

GROUNDWATER

A groundwater database maintained by the New Mexico Office of the State of Engineer (NMOSE) did not identify any registered water wells in Section 12, Township 19S, Range 31E. The Chevron Trend Map utilized by the NMOCD Hobbs District Office indicates depth to groundwater is greater than 300 feet below groundsurface (bgs). No water

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

wells or surface water was observed within 1,000 feet of the release site. Based on the NMOCD ranking criteria, the release area would be classified at a site ranking of zero (0).

ANALYTICAL RESULTS

On October 27, 2016, COG personnel collected four (4) soil samples from the pasture area that was impacted by an overspray. Soil samples were collected from two (2) locations utilizing a hand auger. The soil samples were collected at the surface and at one (1) foot below ground surface (bgs). The soil samples were submitted to a laboratory for analysis of benzene, toluene, ethylbenzene and xylenes (BTEX), total petroleum hydrocarbons (TPH) and chloride.

Analytical results indicate chloride concentration were within the recommended remedial action levels (RRAL)s for a site ranking of zero (0). Chloride concentrations were below the laboratory method detection limit (MDL) of 16 mg/Kg. TPH, benzene, and BTEX concentrations were also below the laboratory MDL of <10.0 mg/Kg, <0.050 mg/Kg, and <0.300 mg/Kg, respectively.

Airbus Federal #1 August 9, 2016					
L-12-19S-31E					
Sample ID	Date	Chloride mg/Kg	Benzene mg/Kg	BTEX mg/Kg	TPH mg/Kg
			10	50	5,000
S-1 Surface	10/27/2016	<16.0	<0.050	<0.300	<10.0
S-1 1'	10/28/2016	<16.0	<0.050	<0.300	<10.0
S-2 Surface	10/29/2016	<16.0	<0.050	<0.300	<10.0
S-2 1'	10/30/2016	<16.0	<0.050	<0.300	<10.0

WORK PLAN

Based on the information provided, COG Operating, LLC has found no impact from the release and would like to submit the enclosed documents for closure of this site. A signed Final C-141 is enclosed for your consideration. Please feel free to contact me with any questions or concerns at (432) 818-2372.

Sincerely,



Rebecca Haskell
Senior HSE Coordinator

Enclosed

- (1) Site Diagram**
- (2) Laboratory Analysis**
- (3) Photo Log**
- (4) Initial C-141 (Copy)**
- (5) Final C-141**



Airbus Federal #1

Legend

- AOI
- Sample Points

Airbus Federal #1

CS1

CS2



1000 ft

Google Earth

November 08, 2016

DAKOTA NEEL

COG OPERATING

P. O. BOX 1630

ARTESIA, NM 88210

RE: AIRBUS FEDERAL #1

Enclosed are the results of analyses for samples received by the laboratory on 11/02/16 11:30.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-16-8. 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
DAKOTA NEEL
P. O. BOX 1630
ARTESIA NM, 88210
Fax To: NONE

Received: 11/02/2016
Reported: 11/08/2016
Project Name: AIRBUS FEDERAL #1
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 10/27/2016
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Angela Cabrera

Sample ID: S-1 SURFACE (H602459-01)

BTX 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	11/08/2016	ND	2.26	113	2.00	0.514	
Toluene*	<0.050	0.050	11/08/2016	ND	2.31	116	2.00	0.484	
Ethylbenzene*	<0.050	0.050	11/08/2016	ND	2.21	111	2.00	0.0411	
Total Xylenes*	<0.150	0.150	11/08/2016	ND	6.72	112	6.00	0.101	
Total BTX	<0.300	0.300	11/08/2016	ND					

Surrogate: 4-Bromofluorobenzene (PID) 112 % 73.6-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	11/03/2016	ND	416	104	400	3.77		

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	11/03/2016	ND	200	100	200	0.268	
DRO >C10-C28	<10.0	10.0	11/03/2016	ND	217	108	200	5.65	

Surrogate: 1-Chlorooctane 82.0 % 35-147

Surrogate: 1-Chlorooctadecane 92.4 % 28-171

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

COG OPERATING
DAKOTA NEEL
P. O. BOX 1630
ARTESIA NM, 88210
Fax To: NONE

Received: 11/02/2016
Reported: 11/08/2016
Project Name: AIRBUS FEDERAL #1
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 10/27/2016
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Angela Cabrera

Sample ID: S-1 1' (H602459-02)

BTX 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	11/08/2016	ND	2.26	113	2.00	0.514	
Toluene*	<0.050	0.050	11/08/2016	ND	2.31	116	2.00	0.484	
Ethylbenzene*	<0.050	0.050	11/08/2016	ND	2.21	111	2.00	0.0411	
Total Xylenes*	<0.150	0.150	11/08/2016	ND	6.72	112	6.00	0.101	
Total BTX	<0.300	0.300	11/08/2016	ND					

Surrogate: 4-Bromofluorobenzene (PID) 111 % 73.6-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	11/03/2016	ND	416	104	400	3.77		

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	11/03/2016	ND	201	100	200	5.19	
DRO >C10-C28	<10.0	10.0	11/03/2016	ND	210	105	200	11.7	

Surrogate: 1-Chlorooctane 99.7 % 35-147

Surrogate: 1-Chlorooctadecane 113 % 28-171

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

COG OPERATING
DAKOTA NEEL
P. O. BOX 1630
ARTESIA NM, 88210
Fax To: NONE

Received: 11/02/2016
Reported: 11/08/2016
Project Name: AIRBUS FEDERAL #1
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 10/27/2016
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Angela Cabrera

Sample ID: S-2 SURFACE (H602459-03)

BTX 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	11/08/2016	ND	2.26	113	2.00	0.514	
Toluene*	<0.050	0.050	11/08/2016	ND	2.31	116	2.00	0.484	
Ethylbenzene*	<0.050	0.050	11/08/2016	ND	2.21	111	2.00	0.0411	
Total Xylenes*	<0.150	0.150	11/08/2016	ND	6.72	112	6.00	0.101	
Total BTX	<0.300	0.300	11/08/2016	ND					

Surrogate: 4-Bromofluorobenzene (PID) 112 % 73.6-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	11/03/2016	ND	416	104	400	3.77	

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	11/03/2016	ND	201	100	200	5.19	
DRO >C10-C28	<10.0	10.0	11/03/2016	ND	210	105	200	11.7	

Surrogate: 1-Chlorooctane 109 % 35-147

Surrogate: 1-Chlorooctadecane 100 % 28-171

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*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

COG OPERATING
DAKOTA NEEL
P. O. BOX 1630
ARTESIA NM, 88210
Fax To: NONE

Received: 11/02/2016
Reported: 11/08/2016
Project Name: AIRBUS FEDERAL #1
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 10/27/2016
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Angela Cabrera

Sample ID: S-2 1' (H602459-04)

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	11/08/2016	ND	2.26	113	2.00	0.514	
Toluene*	<0.050	0.050	11/08/2016	ND	2.31	116	2.00	0.484	
Ethylbenzene*	<0.050	0.050	11/08/2016	ND	2.21	111	2.00	0.0411	
Total Xylenes*	<0.150	0.150	11/08/2016	ND	6.72	112	6.00	0.101	
Total BTEX	<0.300	0.300	11/08/2016	ND					

Surrogate: 4-Bromofluorobenzene (PID) 113 % 73.6-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	11/03/2016	ND	416	104	400	3.77		

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	11/03/2016	ND	201	100	200	5.19	
DRO >C10-C28	<10.0	10.0	11/03/2016	ND	210	105	200	11.7	

Surrogate: 1-Chlorooctane 93.4 % 35-147

Surrogate: 1-Chlorooctadecane 88.3 % 28-171

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

S-06	The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.
QR-03	The RPD value for the sample duplicate or MS/MSD was outside if QC acceptance limits due to matrix interference. QC batch accepted based on LCS and/or LCSD recovery and/or RPD values.
QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
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



Celey D. Keene, Lab Director/Quality Manager



(575) 393-2326 FAX (575) 393-2476

SL#

Project Name: Airbus Federal #001 (2RP-3828)

Location: Eddy County, NM

Photograph No. 1

Date:
December 27, 2017

Description:
Location Sign



Photograph No. 2

Date:
December 27, 2017

Description:
View of Liner



Project Name: Airbus Federal #001 (2RP-3828)

Location: Eddy County, NM

Photograph No. 3

Date:
September 7, 2017

Direction:
Northwest

Description:
View of the
Release Site
following the
removal of facility
equipment and
secondary
containment.



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

Form C-141
Revised August 8, 2011

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

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: Airbus Federal #1	Facility Type: Battery

Surface Owner: Federal	Mineral Owner: Federal	API No. 30-015-35887
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LOCATION OF RELEASE

Unit Letter L	Section 12	Township 19S	Range 31E	Feet from the 1980	North/South Line South	Feet from the 660	East/West Line West	County Eddy
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32.6732254,-103.8293152

NATURE OF RELEASE

Type of Release: Oil and Produced Water	Volume of Release: 14 bbls Oil ; 52 bbls PW	Volume Recovered: 3 bbls Oil ; 20 bbls PW
Source of Release: Lightning	Date and Hour of Occurrence: 8/9/2016 unknown	Date and Hour of Discovery: 8/9/2016 9:00 a.m.
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 / Shelly Tucker – BLM	
By Whom? Amanda Trujillo Davis	Date and Hour: 8/9/2016 3:38 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 lightning struck the facility. The damage was found during the morning route and no fire was reported with the incident. Vacuum trucks were dispatched to recover all standing fluid.

Describe Area Affected and Cleanup Action Taken.*

The majority of the release remained within the bermed area; however a light spray impacted the pasture. A portion of the facility was a total loss. 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: Dakota Neel	Approved by Environmental Specialist:		
Title: Environmental Coordinator	Approval Date:	Expiration Date:	
E-mail Address: dneel2@concho.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 8/12/2016	Phone: 432-215-2783		

* 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.

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: Airbus Federal #001	Facility Type: Battery

Surface Owner: Federal	Mineral Owner: Federal	API No. 30-015-35887
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LOCATION OF RELEASE

Unit Letter L	Section 12	Township 19S	Range 31E	Feet from the 1980	North/South Line South	Feet from the 660	East/West Line West	County Eddy
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32.6732254,-103.8293152

NATURE OF RELEASE

Type of Release: Oil and Produced Water	Volume of Release: 14 bbls Oil ; 52 bbls PW	Volume Recovered: 3 bbls Oil ; 20 bbls PW
Source of Release: Lightning	Date and Hour of Occurrence: 8/9/2016 unknown	Date and Hour of Discovery: 8/9/2016 9:00 a.m.
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 / Shelly Tucker - BLM	
By Whom? Amanda Trujillo Davis	Date and Hour: 8/9/2016 3:38 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 lightning struck the facility. The damage was found during the morning route and no fire was reported with the incident. Vacuum trucks were dispatched to recover all standing fluid.

Describe Area Affected and Cleanup Action Taken.*

The majority of the release remained within a lined facility; however a light spray impacted the pasture. A portion of the facility was a total loss. Concho sampled the adjacent pasture area impacted by a light overspray. Analytical results demonstrated chloride, TPH, benzene, and BTEX concentrations were below NMOCD standards. A final inspection has been conducted regarding the clean-up efforts. Free fluids were removed and if present the impacted gravel was removed from the liner and taken to a NMOCD approved disposal facility. The liner was inspected for damage and found to have liner integrity to contain free fluids.

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: <i>Rebecca Haskell</i>		OIL CONSERVATION DIVISION	
Printed Name: Rebecca Haskell		Approved by Environmental Specialist:	
Title: Senior HSE Coordinator	Approval Date:	Expiration Date:	
E-mail Address: rhaskell@concho.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: December 6, 2017 Phone: 432-683-7443			

* Attach Additional Sheets If Necessary