

RECEIVED By JKeyes at 10:28 am, Nov 10, 2015 Environmental Coordinator APPROVED By JKeyes at 10:28 am, Nov 10, 2015

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

Re: Burton 35 #1 30-025-40510 Sec. 35, T22S-R33E Lea County, NM

Ms. Jones,

COG Operating LLC would like to submit for your consideration the enclosed closure request for the above captioned well. The request is in response to the C-141 Initial report dated August 15, 2015.

Octo

# Background

The release was caused by a check valve failure resulting in the release of approximately 50 barrels of produced water with 48 barrels recovered. All fluid released was contained within the bermed facility.

# 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 400'.

# Soil Assessment and Analytical Results

Sampling points within the release area were chosen based on the point of release and safety in regards to buried lines and existing infrastructure. Approximate location of the sample points chosen are depicted on the attached site diagram as S1 and S2. The diagram also includes a sample summary table with the analytical results attached.

# Work Plan

COG Operating LLC proposes that no excavation be required within the berm facility based on the analytical results obtained and lack of any possible impact to ground water at depth to ground water greater than 400'. The bermed area will be addressed under COG's normal housekeeping protocol.

NMOCD October 23, 2015 Page 2

If there are no objections or further stipulations, COG Operating LLC requests closure of the above captioned location. Please feel free to contact me with any questions or concerns at (575) 748-6933.

Sincerely,

Xn C -

Lupe Carrasco Environmental Coordinator

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



# Burton 35 #1





August 24, 2015

LUPE CARRASCO

COG Operating, LLC

500 W. ILLINOIS

Midland, TX 79701

RE: BURTON 35 #1

Enclosed are the results of analyses for samples received by the laboratory on 08/19/15 14:19.

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 <a href="https://www.tceq.texas.gov/field/ga/lab\_accred\_certif.html">www.tceq.texas.gov/field/ga/lab\_accred\_certif.html</a>.

Cardinal Laboratories is accreditated 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. Keine

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:	08/19/2015	Sampling Date:	08/14/2015	
Reported:	08/24/2015	Sampling Type:	Soil	
Project Name:	BURTON 35 #1	Sampling Condition:	Cool & Intact	
Project Number:	NONE GIVEN	Sample Received By:	Judy Garcia	
Project Location:	NOT GIVEN		July Guicia	

### Sample ID: S1-1' (H502164-01)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1960	16.0	08/20/2015	ND	400	100	400	3.92	

### Sample ID: S1-2' (H502164-02)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	400	16.0	08/20/2015	ND	400	100	400	3.92	

### **Cardinal Laboratories**

\*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed walved unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidential or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by dient, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claims issue upon any of the above stated reasons or otherwise. Results relate only to the sample identified above. This report shall not be reprodued except in full with writen approval of Cardinal Linearatories.

Celeg Di Keine -



### **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 $6^{\circ}\text{C}$
	Samples reported on an as received basis (wet) unless otherwise noted on report

### **Cardinal Laboratories**

### \*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thiny (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such daim is based upon any of the above stated reasons or otherwise, Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celeg Litterne -

.

101 East Marland, Hobbs, NM 88240 (575) 393-2326 FAX (575) 393-2476	340 176				
Company Name: COG Operating LLC		BILL TO			ANALYSIS REQUEST
Project Manager: Lupe Carrasco		P.O. #:			
Address: 2208 West Main		Company: COG Ope	COG Operating LLC		
City: Artesia State: NM	Zip 88210		cNeill		
Phone #: (575) 748-6940 Fax #:		Address: 600 W Illinois	Illinois		
Project #: Project Owner:	• •	City: Midland	ā.		
Project Name: Burton 35 #1		State: TX Zip: 79701	0	(m.).	
Project Location:		Phone #: (432) 221-0388	Ċ¤		
Sampler Name: Lupe Carrasco		Fax #:			
	MATRIX	PRESERV. SAMPLING	LING	5	
Lab I.D. Sample I.D.	B OR (C)OMP TAINERS NDWATER EWATER GE	BASE: OOL		ie	
15UCIET	# C GR		TIME	TF Cr	
2 S1-2'		8/14/15		×	
<b>3</b> S1-3		8/14/15		*	
4 S1-4				*	
S 81-61				*	
PLASE NOTE: Liability and Damages. Cardnal's liability and client's exclusive remedy for any client ansing whether hased in contract or thet, shall be finited to the amount pad by the client for the analyses. All claims including these for negligence and any other cause whistower shall be deemed whether hased in contract or thet, shall be finited to the amount pad by the client for the services. In on event half Cardnal be liable for incidental or consequental damages, including whoul limitation, business interruptions, loss of use, or loss of profits incured by deert, its subaldiments,	y claim ansing whether based in contract element waived unless made in writing and waihout limitation, business interruptions, i	or tort, shall be fernind to the amount pe I received by Cardinal within 30 days sit oss of use, or loss of profils incurred by	d by the client for the or completion of the applicable client, its subsidiaries,		
Relinquished By: Date: Time:	Received By:		Phone Result: Fax Result: REMARKS: 90		Add"I Phone #: Add"I Fax #: 0.00M PI FASE RUN CHI ORIDES UNTIL THEY
Relinquished By:	Received By:	2	FALL BELOW 1000 P	PM	
Delivered By: (Circle One)	12	CH			
Sampler - UPS - Bus - Other:	H No I No		N.		
	Ì				

大井



August 24, 2015

LUPE CARRASCO COG Operating, LLC

500 W. ILLINOIS

Midland, TX 79701

RE: BURTON 35 #1

Enclosed are the results of analyses for samples received by the laboratory on 08/19/15 14:19.

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 <a href="https://www.tceg.texas.gov/field/qa/lab">www.tceg.texas.gov/field/qa/lab</a> accredited certif.html.

Cardinal Laboratories is accreditated 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. Keine

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:	08/19/2015	Sampling Date:	08/14/2015
Reported:	08/24/2015	Sampling Type:	Soil
Project Name:	BURTON 35 #1	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Judy Garcia
Project Location:	NOT GIVEN		

### Sample ID: S2-1' (H502165-01)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	08/20/2015	ND	400	100	400	3.92		

### Cardinal Laboratories

### \*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatooever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be lable for incidential or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such damins based upon any of the above stated reasons or otherwise. Results relate only to the sample identified above. This report shall not be reproduced except in full with writen approval of Cardinal to cardinal.

Celeg D. Keens-



### **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 $6^{\circ}\text{C}$
	Samples reported on an as received basis (wet) unless otherwise noted on report $% \left( {{{\mathbf{x}}_{i}}} \right)$

### **Cardinal Laboratories**

### \*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celeg D. Keine -

- 1	
- 1	
- 1	
- 1	
- 1	
- 1	
-	
O	
m	
2	
8	
-	
à	
3	
9	
-	
ᅔ	
ы	
101 East Marland, Hobbs, N	
(n)	
-	
s,	
-	
ä	
<b>VM 8824</b>	
£	
0	

# CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

-1		1.00
8		-
1		
1	-	0
	12	-
	<b>•</b>	
	~	100
	(3)	LUI
1		01
	-	10
1	6.3	- 92.1
	100	- CT - 1
	<b>u</b>	1000
	6.3	-
1	TT.	
	1.5.5	2
1		
	ω.	-
	6.5	- 50
1		-
	07	121
		0.1
	-	-
1	1	T
a la		
1		01
1	2	- Maria
	-	<b>v</b>
	10	- CT
	01	
	-	91
1	100	-
		1000
1		
1	1.5	-
1	~	
1	60	-
4	10.3	101 East Marland, Hobbs, NM 1
1	~	00
	(575) 393-2326 FAX (575) 393-247	8824
	N.	
	•	N
	1.1	- N

	(575) 393-2326 FAX (575) 393-2476	5) 393-2476					
<b>Company Name:</b>	COG Operating LLC		BILL TO		A	ANALYSIS REQUEST	
Project Manager:	Lupe Carrasco		P.O. #:				
Address: 2208	2208 West Main		Company: COG Operating LLC	ting LLC			
City: Artesia	Sta	State: NM Zip 88210	Attn: Robert McNeil	Veil			
Phone #:	(575) 748-6940 Fax #:		Address: 600 W Illinois	inois			
Project #:	Proj	Project Owner:	City: Midland				-
ame:	Burton 35 #1		State: TX Zip: 79701	-			
Project Location:		1 University of the second se second second se second second s	Phone #: (432) 221-0388				
Sampler Name:	Lupe Carrasco		Fax #:				_
FOR LAB USE ONLY		MATRIX	PRESERV. SAMPLING	NG			
Lab I.D.	Sample I.D.	(G)RAB OR (C)OM # CONTAINERS GROUNDWATER WASTEWATER SOIL OIL SLUDGE	OTHER : ACID/BASE: ICE / COOL OTHER : D	BTEX	TPH Chloride		1
	S2-1'		8/14/15	de la constitución de la const	Ø		1
7	S2-2'		8/14/15		ł		1
S	S2-4'		8/14/15		k		1
2	S2-6'				k		
N	S2-8'				k		the second se
PLEASE NOTE: Lubbility and analyses. All chairs including	Damages, Caudina's tability and client's exclu- tions for negligence and any other cause wh	PLEASE NOTE: Labelity and Damages. Candona's tablity and client's exclusive remedy for any claim arkeing whethat based in contract or ford, shell be feraled to the amount paid by the client for the analyses. All claims including them and any other cause whethere remedy for any claim arkeing whethat based in contract or ford, shell be feraled to the amount paid by the client for the analyses. All claims including them and any other cause whethere remedy for any claim arkeing whethat based in contract or ford, shell be feraled to the amount paid by the client for the analyses. All claims including them and any other cause whethere remedy for any claim arkeing whethat based in contract or ford, shell be feraled to the amount paid by the client for the analyses. All claims including the amount paid by the client for the applicable analyses. All claims including the amount paid by the client for the applicable analyses. All claims including the amount paid by the client for the applicable analyses. All claims including the amount paid by the client for the applicable analyses. All claims including the amount paid by the client for the applicable analyses. All claims including the amount paid by the client for the applicable analyses. All claims including the amount paid by the client for the applicable analyses. All claims including the amount paid by the client for the applicable analyses. All claims including the amount paid by the amount paid by the above analyses. All claims including the amount paid by the amount	r fort, strail be finished to the amount padd	by the client for the completion of the applicable			
Relinquished By:	g out of at related to the performance of services here:	antitudes or successors arising out of or releved to the parternance of services hereinder by Cardinal, requiress of weather such claim is based upon any of the above saided Relinquished By: Date: Received By: Time:	based upon any of the shows satisf rei	두	Yes     No     Add'l Phone       Yes     No     Add'l Fax #:       gcarrasco(g)concho.com	*	
Relinquished By:	1,520	Date: 915 Received By:		atrujillo@concho. FALL BELOW 10	1000 PPM	PLEASE RUN CHLORIDES UNTIL THEY	
		$\int$	8				
Delivered By: (Circle One)	(Circle Une)	Cool Intact	(Initials)				

Page 4 of 4

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

十つ井

Sampler - UPS - Bus - Other: FORM-006 R 2.0

Sample Condition Cool Intact Ores Pres

3

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

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

Release Notification and Corrective Action								
	<b>OPERA</b>	ГOR	🛛 Initia	al Report	Final Report			
Name of Company: COG Operating LLC		bert McNeill						
Address: 600 West Illinois Avenue, Midland TX 79701		No. 432-230-001	17					
Facility Name: Burton 35 #1	Facility Typ	e: Battery						
Surface Owner: Fee Mineral Owne	er:		API No	. 30-025-4	0510			
	ON OF RE	LEASE						
Unit LetterSectionTownshipRangeFeet from theNoA3525S33E660'	orth/South Line North							
Latitude 32.0924	187 Longitud	e-103.5366821						
	E OF REL							
Type of Release:	Volume of		Volume R	ecovered:				
Produced Water	50 bbls PW		48 bbls P					
Source of Release:		our of Occurrence		Hour of Discovery:				
Tank Overflow Was Immediate Notice Given?	8/1/2015 1		10:00 am					
Was Immediate Notice Given? If YES, To Whom?								
By Whom? Lupe Carrasco Date and Hour: Mon 8/3/2015 11:36 AM								
Was a Watercourse Reached?	If YES, Vo	lume Impacting t	he Watercourse.					
If a Watercourse was Impacted, Describe Fully.*								
Describe Cause of Problem and Remedial Action Taken.* This release was caused by a tank overflow due to a check valve failure. Vacuum trucks were dispatched to recover all standing fluids.								
Describe Area Affected and Cleanup Action Taken.*								
This release occurred within 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.								
Signature: <u>OIL CONSERVATION DIVISION</u>								
Printed Name: Amanda Trujillo Approved by Environmental Specialist:								
Title: Senior Environmental Coordinator	Approval Date	3;	Expiration D	Date:				
E-mail Address: atrujillo@concho.com	_ Conditions of	Approval:		Attached				
Date: August 15, 2015 Phone: 575-748-6940								

\* Attach Additional Sheets If Necessary

State of New Mexico Energy Minerals and Natural Resources

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

Revised August 8, 2011 Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Form C-141

Release Notification and Corrective Action									
OPERATOR Initial Report X Final R									
Name of Company: COG Operating LLC	Contact: Ro	bert McNeill							
Address: 600 West Illinois Avenue, Midland TX 79701		No. 432-230-00	77						
Facility Name: Burton 35 #1	Facility Typ	e: Battery							
Surface Owner: Fee Mineral Owner	*		API No	. 30-025-4	0510				
LOCATION OF RELEASE									
Unit LetterSectionTownshipRangeFeet from theNorA3525S33E660'	NorthFeet from the 660'East/West LineCountyLineCountyEastEddy								
			East		Eddy				
Latitude 32.09241	0								
Type of Release:	E OF REL		Valuma B	an a					
Produced Water	50 bbls PV			Volume Recovered: 48 bbls PW					
Source of Release:		our of Occurrenc		nd Hour of Discovery:					
Tank Overflow	8/1/2015 1	0:00 am	e er gr						
Was Immediate Notice Given? If YES, To Whom?									
By Whom? Lupe Carrasco	5 11:36 AM	26 414							
Was a Watercourse Reached?		lume Impacting t							
🗋 Yes 🖾 No		tunie inipacting t	ne watercourse.						
If a Watercourse was Impacted, Describe Fully.*									
Describe Cause of Problem and Remedial Action Taken.*									
This release was caused by a tank overflow due to a check valve failure	Vacuum truck	s were dispoteba	to recover all step	dina fluida					
		s were uispatchet	i to recover an stand	ung nulds.					
Describe Area Affected and Cleanup Action Taken.*									
Describe Area Affected and Cleanup Action Taken.*									
This release occurred within the bermed area of the facility. Concho had	the spill site sa	mpled to delineat	e any possible cont	amination fr	om the	release and			
presented a closure request to the NMOCD for approval.	the opin one of	inplea to defined	e any possible com		om me	release and			
Therefore a set to the test of									
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 remedia	ate contamination	irked as "Final Re	port does not relie	ve the opera	itor of I	iability			
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: accase									
Printed Name: Lupe Carrasco	Approved by	Environmental Sp	ecialist:						
Title: Environmental Coordinator	Approval Date		Eurofantia D						
	Approval Date		<u>Expiration D</u>						
E-mail Address: gcarrasco@concho.com	Conditions of	Approval:		Attached					
Date: October 1, 2015 Phone: 575-748-6940	Attached								

Date: October 1, 2015 Pho \* Attach Additional Sheets If Necessary