



[Dakota Neel]  
[HSE Coordinator]

March 11, 2018

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

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

**Re: Closure Letter**  
**RJ Unit #126**  
**API #: 30-015-03784**  
**RP#: 2RP-4520**  
**Unit Letter G Section 35, Township 17S, Range 29E**  
**Eddy County, NM**

Mr. Bratcher/Ms. Price,

COG Operating, LLC (COG) is pleased to submit for your consideration the following closure report for the RJ Unit #126. This report is in response to an oil and produced water release that occurred on December 14, 2017. A work-plan was submitted to the New Mexico Oil Conservation Division (NMOCD) and Bureau of Land Management (BLM) on March 8, 2018 and was approved on April 20, 2018 and March 8, 2018 respectively.

## **BACKGROUND**

On December 14, 2017, a poly flowline ruptured resulting in the release of approximately three (3) barrels (bbls) of oil and four (4) bbls of produced water in the pasture and along the lease road. Approximately one (1) bbl of oil and one (1) bbl of produced water were recovered. The RP number NMOCD assigned to this release was 2RP-4520.

June 11, 2018

## REMEDIAL ACTIONS

- The area of T1 (2,500 SQFT) was excavated thru the depth of three (3) feet BGS.
- All of the excavated material was hauled to an NMOCD approved solid waste disposal facility.
- The excavation was backfilled with like material and contoured to match the surrounding location.

Based on the information provided, COG Operating LLC, would like to request closure of the RP number 2RP-4520 associated with this release. Please feel free to contact me with any questions or concerns at (432) 215-2783.

Sincerely,



Dakota Neel  
HSE Coordinator  
[Dneel2@concho.com](mailto:Dneel2@concho.com)

Enclosed:

- 1) C-141 Final
- 2) C-141 Initial (Copy)
- 3) Approved Workplan

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 April 3, 2017

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: <b>COG Operating, LLC (OGRID# 229137)</b>	Contact: <b>Robert McNeill</b>
Address: <b>600 West Illinois Avenue, Midland TX 79701</b>	Telephone No.: <b>432-683-7443</b>
Facility Name: <b>RJ UNIT #126</b>	Facility Type: <b>Well</b>

Surface Owner: Federal	Mineral Owner: Federal	API No.: 30-015-03784
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### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
G	35	17S	29E	1295	North	2615	West	Eddy

Latitude: 32.7927394 Longitude: -104.0448796 NAD83

### NATURE OF RELEASE

Type of Release: Oil & Produced Water	Volume of Release: 3 bbl. Oil & 4 bbl. PW	Volume Recovered: 1 bbl. Oil & 1 bbl. PW
Source of Release: Flowline	Date and Hour of Occurrence: 12-14-17 9:30am	Date and Hour of Discovery: 12-14-17 9:30am
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour:	
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 rupture in a poly flowline. The damaged portion of the flowline has been replaced.

Describe Area Affected and Cleanup Action Taken.\*

The release occurred in the pasture along the lease road. A vacuum truck was dispatched to recover all freestanding fluids. This release has been remediated according to the workplan approved by the NMOCD and the BLM.

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>	
	Approved by Environmental Specialist: 	
Printed Name: Dakota Neel	Approval Date: 11/17/2022	Expiration Date:
Title: HSE Coordinator	Conditions of Approval:	
E-mail Address: dneel2@concho.com	Attached <input type="checkbox"/>	
Date: June 11, 2018 Phone: 575-746-2010		

\* Attach Additional Sheets If Necessary

District I  
1625 N. French Dr., Hobbs, NM 88240  
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State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

**NM OIL CONSERVATION**  
ARTESIA DISTRICT  
DEC 15 2017  
RECEIVED

Form C-141  
Revised April 3, 2017  
Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

**Release Notification and Corrective Action**

NAB173522A901

**OPERATOR**  Initial Report  Final Report

Name of Company: <b>COG Operating, LLC (OGRID# 229137)</b>	Contact: <b>Robert McNeill</b>
Address: <b>600 West Illinois Avenue, Midland TX 79701</b>	Telephone No.: <b>432-683-7443</b>
Facility Name: <b>RJ UNIT #126</b>	Facility Type: <b>Well</b>
Surface Owner: <b>Federal</b>	Mineral Owner: <b>Federal</b>
API No.: <b>30-015-03784</b>	

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
G	35	17S	29E	1295	North	2615	West	Eddy

Latitude: 32.7927394 Longitude: -104.0448796 NAD83

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Type of Release: Oil & Produced Water	Volume of Release: 3 bbl. Oil & 4 bbl. PW	Volume Recovered: 1 bbl. Oil & 1 bbl. PW
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Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour:	
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 rupture in a poly flowline. The damaged portion of the flowline has been replaced.		
Describe Area Affected and Cleanup Action Taken.*		
The release occurred in the pasture along the lease road. A vacuum truck was dispatched to recover all freestanding fluids. Concho will have the spill area evaluated for any possible impact from the release and we will present a remediation work plan to the NMOCD for approval prior to any significant remediation activities.		
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.		

**OIL CONSERVATION DIVISION**

Signature:	Approved by Environmental Specialist:	
Printed Name: Dakota Neel	Approval Date: 12/18/17	Expiration Date: N/A
Title: HSE Coordinator	Conditions of Approval: <b>See attached</b>	
E-mail Address: dneel2@concho.com	Attached <input checked="" type="checkbox"/> <b>ARP-4520</b>	
Date: December 15, 2017 Phone: 575-746-2010		

\* Attach Additional Sheets If Necessary

12/15/17AB

Operator/Responsible Party,

The OCD has received the form C-141 you provided on **12/15/17** regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number ARD-4520 has been assigned. **Please refer to this case number in all future correspondence.**

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

*The responsible person shall complete division-approved corrective action for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC. [emphasis added]*

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. **As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District II office in Artesia on or before 1/15/18. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.**

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

- Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C<sub>6</sub> thru C<sub>36</sub>), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.
- Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C<sub>6</sub> thru C<sub>36</sub>), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.
- Nominal detection limits for field and laboratory analyses must be provided.
- Composite sampling is not generally allowed.
- Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

- Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.

- If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.

- Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

**Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.**

**Jim Griswold**

OCD Environmental Bureau Chief  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
505-476-3465  
jim.griswold@state.nm.us

**Weaver, Crystal, EMNRD**

---

**From:** Dakota Neel <DNeel2@concho.com>  
**Sent:** Friday, December 15, 2017 7:06 AM  
**To:** Weaver, Crystal, EMNRD; Bratcher, Mike, EMNRD; stucker@blm.gov  
**Cc:** James\_Amos@blm.gov; Robert McNeill; Sheldon Hitchcock; Rebecca Haskell; Christopher Gray  
**Subject:** (C-141 Initial) RJ Unit #126 (FL) 12-14-17 (30-15-03784)  
**Attachments:** (C-141 Initial) RJ Unit #126 (FL) 12-14-17 (30-15-03784).pdf

Ms. Weaver/Ms. Tucker,

Please find the attached Initial C-141 for your consideration. If you have any questions or concerns please contact me.

Thank you,

**Dakota Neel**  
**HSE Coordinator**  
**COG Operating LLC**  
**Cell: 432-215-2783**  
**dneel2@concho.com**

**2407 Pecos Ave.**  
**Artesia , NM 88210**



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[Dakota Neel]  
[HSE Coordinator]

March 8, 2018

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

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

**Re: Work Plan**  
**RJ Unit #126**  
**API #: 30-015-03784**  
**RP#: 2RP-4520**  
**Unit Letter G Section 35, Township 17S, Range 29E**  
**Eddy County, NM**

Ms. Weaver/Ms. Price,

COG Operating, LLC (COG) is pleased to submit for your consideration the following remediation work plan for the RJ Unit #126. This plan is in response to an oil and produced water release that occurred on December 14, 2017. A C-141 initial report was submitted to the New Mexico Oil Conservation Division (NMOCD) subsequent to the release.

## **BACKGROUND**

On December 14, 2017, a poly flowline ruptured resulting in the release of approximately three (3) barrels (bbls) of oil and four (4) bbls of produced water in the pasture and along the lease road. Approximately one (1) bbl of oil and one (1) bbl of produced water were recovered. The RP number NMOCD assigned to this release was 2RP-4520.

On February 14, 2017, a site assessment and soil sampling were conducted in order to vertically and horizontally define the area impacted by this release. A site diagram is included in Appendix I. The analytical results from the soil sampling activities are summarized in the table below.

## **ANALYTICAL RESULTS**

June 11, 2018

RJ Unit #126 December 14, 2017					
G-35-17S-29E					
Sample ID	Date	Chloride mg/Kg	Benzene mg/Kg	BTEX mg/Kg	TPH mg/Kg
T-1	2/14/2018	4,360	106	1,560	11,500
T-1 1'	2/14/2018	1,490	0.00805	0.0472	<15.0
T-1 2'	2/14/2018	1,400	<0.00200	0.00225	<15.0
T-1 3'	2/14/2018	1,610	<0.00202	0.00219	<14.9
T-1 4'	2/14/2018	118	<0.00199	<0.00199	<15.0
T-1 5'	2/14/2018	-	<0.00199	<0.00199	<15.0
T-2	2/14/2018	<4.96	<0.00200	0.0903	410
T-2 1'	2/14/2018	-	<0.00198	0.00254	<15.0
T-2 2'	2/14/2018	-	<0.00202	0.00288	<15.0
T-3	2/14/2018	<4.95	<0.00200	<0.00200	<15.0
T-3 1'	2/14/2018	-	<0.00200	<0.00200	<15.0
T-4	2/14/2018	<4.92	<0.00201	<0.00201	<15.0
T-4 1'	2/14/2018	-	<0.00199	0.00204	<15.0
T-4 2'	2/14/2018	-	<0.00199	<0.00199	<15.0

(-) Analysis not requested

## GROUNDWATER AND SITE RANKING

According to the 2005 Chevron Texaco groundwater trend map, groundwater in the project vicinity is approximately one-hundred and eighty (180) feet below ground surface (BGS). No water well or surface water was observed within one-thousand (1,000) feet of the release site. Therefore the site ranking for this release is zero (0) based on the following:

Depth to groundwater	>100-feet
Distance to surface water body	>1000-feet
Wellhead Protection Area	>1000-feet

June 11, 2018

## PROPOSED REMEDIAL ACTIONS

- The area of T1 will be excavated to the depth of three (3) feet BGS.
- All of the excavated material will be hauled to an NMOCD approved solid waste disposal facility.
- The excavation will be backfilled with caliche and contoured to match the surrounding location.
- The site will be reseeded in June of 2018.

Should you have any questions or concerns please do not hesitate to contact me.

Sincerely,

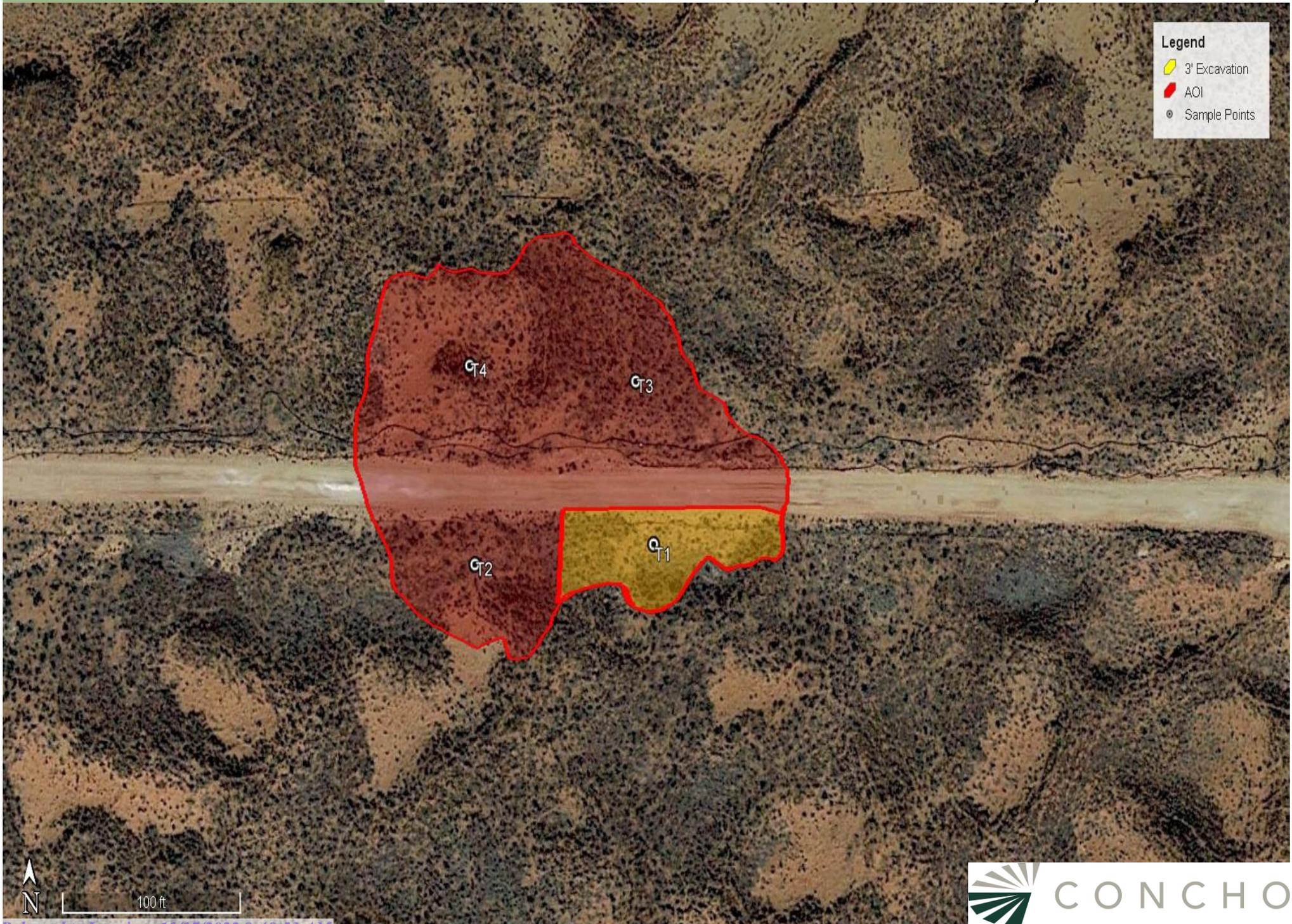


Dakota Neel  
HSE Coordinator  
[Dneel2@concho.com](mailto:Dneel2@concho.com)

Enclosed:

- Appendix I: Site Diagram
- Appendix II: Initial C-141 (Copy)
- Appendix III: Analytical Reports and Chain-of-Custody Forms

# RJU Central Tank Battery



**Legend**

- 3' Excavation
- AOI
- Sample Points

G4

G3

G2

G1



100 ft



**District I**  
 1625 N. French Dr., Hobbs, NM 88240  
 Phone:(575) 393-6161 Fax:(575) 393-0720

**District II**  
 811 S. First St., Artesia, NM 88210  
 Phone:(575) 748-1283 Fax:(575) 748-9720

**District III**  
 1000 Rio Brazos Rd., Aztec, NM 87410  
 Phone:(505) 334-6178 Fax:(505) 334-6170

**District IV**  
 1220 S. St Francis Dr., Santa Fe, NM 87505  
 Phone:(505) 476-3470 Fax:(505) 476-3462

**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

CONDITIONS

Action 159664

**CONDITIONS**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 159664
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

**CONDITIONS**

Created By	Condition	Condition Date
amaxwell	None	11/17/2022