



Remediation Summary & Closure Request

Property:
Concho Operating, LLC.
Cottonwood 36 State SWD #1
Eddy County, New Mexico
Unit Letter "K", Section 35, Township 25 South, Range 26 East
Latitude 32.0844536, Longitude -104.2486954
2RP-3695

December 2017

Prepared for:

Concho Operating, LLC.
600 West Illinois Avenue
Midland, TX 79701
Attn: **Mrs. Rebecca Haskell**

Prepared by:

Ryan Reich
Environmental Project Manager

Thomas Franklin
Environmental Manager

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Remediation Summary & Closure Request

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1.0 INTRODUCTION

1.1 Site Description & Background

American Safety Services Inc. (ASSI) has prepared this Closure Request for the Concho Operating, LLC. (COG) Cottonwood 36 State SWD #1. This Closure request is based upon the interpretation of the data collected by COG and ASSI.

The Cottonwood 36 State SWD #1 (referred to hereinafter as the "Site" or "subject Site") is located in Unit Letter "K", Section 35, Township 25 South, Range 26 East, Eddy County, New Mexico (GPS 32.0844536N, -104.2486954W).

Remedial actions were conducted by COG and ASSI in accordance with New Mexico Energy, Minerals, and Natural Resources Department (EMNRD), Oil Conservation Division (NMOCD) rules (*NMAC 19.15.29 Release Notification*) and the NMOCD *Guidelines for Remediation of Leaks, Spills and Releases* as guidance.

1.2 Project Objective

The objective of the Closure Request is to present documentation of the activities that were performed to date and to request an effective means to close the Site.

1.3 Standard of Care

ASSI's services are performed in accordance with standards provided by a firm rendering the same or similar services in the area during the same time period. ASSI makes no warranties, express or implied, as to the services performed hereunder. Additionally, ASSI does not warranty the work of third parties supplying information used in the report (e.g. laboratories, regulatory agencies, or other third parties). This scope of services will be performed in accordance with the scope of work agreed with the client.

1.4 Reliance

This report has been prepared for the exclusive use of COG, and any authorization for use or reliance by any other party (except a governmental entity having jurisdiction over the Site) is prohibited without the express written authorization of COG and ASSI. Any unauthorized distribution or reuse is at the sole risk of COG. Notwithstanding the foregoing, reliance by authorized parties will be subject to the terms, conditions and limitations stated in the proposal, the report, and ASSI's Agreement. The limitation of liability defined in the agreement is the aggregate limit of ASSI's liability to the client.

2.0 SITE RANKING & PROPOSED REMEDIAL ACTION GOALS

The Site is subject to regulatory oversight by the NMOCD. To address activities related to releases, the NMOCD utilizes the *Guidelines for Remediation of Leaks, Spills and Releases* as guidance, in addition to the NMOCD rules, specifically NMAC 19.15.29 *Release Notification*. These documents establish investigation and abatement action requirements for sites subject to reporting and/or corrective action.

In accordance with the NMOCD's *Guidelines for Remediation of Leaks, Spills and Releases*, ASSI utilized the general site characteristics to determine the appropriate "ranking" for the Site. The ranking criteria and associated scoring are provided in the table below:

Ranking Criteria			Ranking Score
Depth to Groundwater	<50 feet	20	20
	50 to 99 feet	10	
	>100 feet	0	
Wellhead Protection Area, <1,000 feet from a water source, or; <200 feet from private domestic water source.	Yes	20	0
	No	0	
Distance to Surface Water Body	<200 feet	20	0
	200 to 1,000 feet	10	
	>1,000 feet	0	
Total Ranking Score			20

Based on ASSI's evaluation of the scoring criteria, the Site would have a Total Ranking Score of 20. This ranking is based on the following:

- The depth to the initial groundwater-bearing zone is less than 50 feet at the Site.
- The impacted area is greater than 200 feet from a private domestic water source.
- Distance to the nearest surface water body is greater than 1,000 ft.

Based on a Total Ranking Score of 20, cleanup goals for soils remaining in place include: 10 milligrams per kilogram (mg/Kg) for Benzene, 50 mg/Kg for Total Benzene, Toluene, Ethylbenzene, and Xylene (BTEX), 100 mg/Kg for Total Petroleum Hydrocarbons (TPH), and 600 mg/Kg for Chloride.

Figures 1 and 2 show the location of the Site in Lea County, New Mexico and surrounding topography.

2.1 Groundwater Research

According to research conducted on the New Mexico Office of the State Engineer (NMOSE) groundwater database, no registered water wells are located in section 36. According to ChevronTexaco Groundwater Trend Map, groundwater is between twenty-five (25) and fifty (50) feet in the approximate location of the Site.

3.0 INITIAL RESPONSE & ACTIVITIES

3.1 Initial Response

On June 15, 2016, COG personnel responded to a reportable release that occurred on May 6, 2016. Five (5) bbls of produced water were released directly to the ground caused when the threading collar above the master valve washed out on the wellhead. Three (3) bbls of the fluid was recovered. The release impacted approximately two hundred (200) square feet of production pad area (Figure 3).

3.2 Sampling Activities

Sampling activities were conducted on June 15, 2016 by COG utilizing a stainless steel hand auger. Two (2) auger holes were installed, each to depths ranging from surface (0') to three (3) foot below ground surface (bgs) (Table 1) and shown on Figure 4. Discrete samples were collected from all auger hole locations at the following intervals: Surface, 1', 2' and 3' bgs. Soil was field screened for Chloride utilizing electro conductivity during sampling activities.

3.3 Soil Sampling Analytical Results

Analytical results were compared to the NMOCD *Guidelines for Remediation of Leaks, Spills and Releases* (Section VI A. Contaminated Soils) and show BTEX and TPH are both vertically throughout the entire release footprint, however, Chloride levels in both sample locations are above the NMOCD clean-up goals as discussed in Section 2.0. Specifically, at sample location S1, the highest Chloride concentration was 2,480 mg/Kg at the surface with vertical delineation achieved at one (1) foot bgs with a Chloride concentration of 416 mg/Kg. Sample location S2 had the most elevated Chloride concentration of 4,800 mg/Kg at the surface and vertical delineation was achieved at two (2) feet bgs with a concentration of 288 mg/Kg. Delineation efforts were achieved during the implementation of the approved remediation work plan. Each location meets the NMOCD's threshold of 600 mg/Kg satisfying clean-up goal criteria.

3.4 Excavation Activities

Excavation remediation activities were conducted by ASSI and began in the area previously identified. Mr. Ryan Reich, an ASSI environmental professional, was present to observe on-Site activities. Remediation efforts began on September 15, 2017 and were completed on September 25th and included the removal of impacted material from the Site and transporting it off-Site to an appropriate disposal facility. The final dimensions of the excavation were thirty-five (35) feet in length, twenty-five (25) feet in width and one and one (1) feet in depth near the center as shown in Figure 4 (Appendix A). Approximately forty (40) cubic yards (yd³) of impacted soil was transported to R-360 Environmental Solutions for proper disposal, the manifests are shown in Appendix E.

3.4.1 Excavation Confirmation Soil Sampling Program

Confirmation sampling to confirm the horizontal extent of the release was conducted on November 21, 2017. A total of five (5) samples were collected, a horizontal delineation sample in each perspective cardinal direction (CS-1 North, CS-1 South, CS-1 East and CS-1 West) and an excavated bottom (CS-1 Bottom). The Confirmation samples were collected for Chloride, all confirmation samples were below NMOCD guidelines.

4.0 LABORATORY ANALYTICAL METHODS

The samples were analyzed for TPH GRO/DRO utilizing EPA method SW-846 8015, BTEX using EPA method SW-846 8021B, and Chloride utilizing EPA method SW-846 300.1. Copies of the laboratory analysis are provided in Appendix D.

Soil was collected in laboratory prepared glassware, placed on ice, and packed in a cooler. The sample coolers and completed chain-of-custody forms were relinquished to Cardinal Laboratories in Hobbs, New Mexico for the September 21st sampling event and to Xenco Laboratories in Midland, Texas for the August 21st sampling event.

Figure 4 shows the approximate location of the sampling (i.e., Auger Hole, Sidewall and Trench) locations and dimensions of the previously excavated area in relation to pertinent land features and general Site boundaries, which is included in Appendix A.

5.0 REMEDIATION SUMMARY AND CLOSURE REQUEST

Based upon the data provided by ASSI, the constituents of concern were horizontally and vertically delineated below the cleanup levels. The excavated area was backfilled and brought to grade with clean material. Based upon the response actions and laboratory analytical results, no additional investigation and/or remediation appears warranted at this time. ASSI respectfully requests closure of the Site on behalf of COG. Copies of the Initial and Final C-141 are provided in Appendix D.



APPENDIX A

Figures

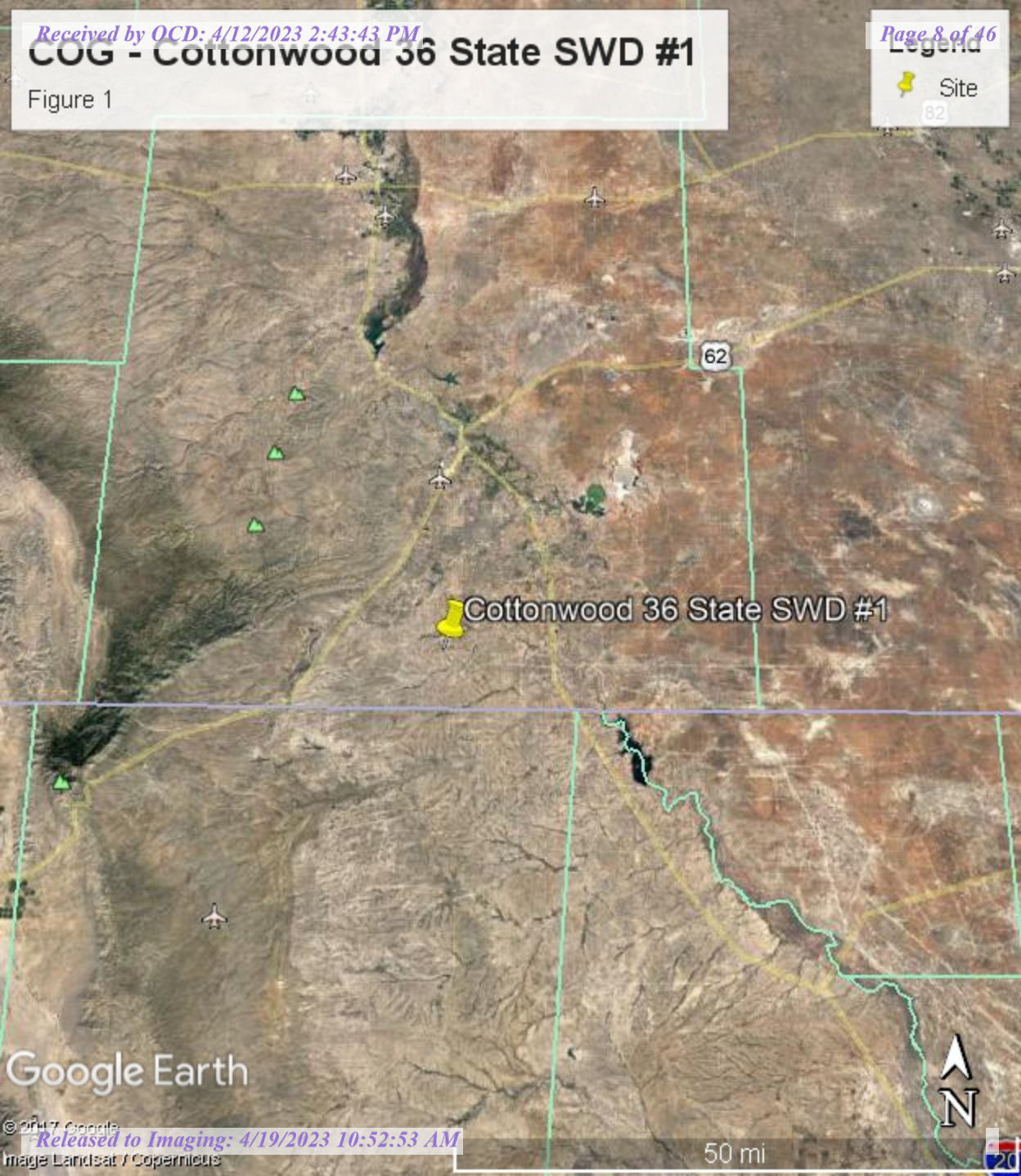
COG - Cottonwood 36 State SWD #1

Figure 1

Legend

Site

82



Cottonwood 36 State SWD #1

Google Earth

COG - Cottonwood 36 State SWD #1

Legend


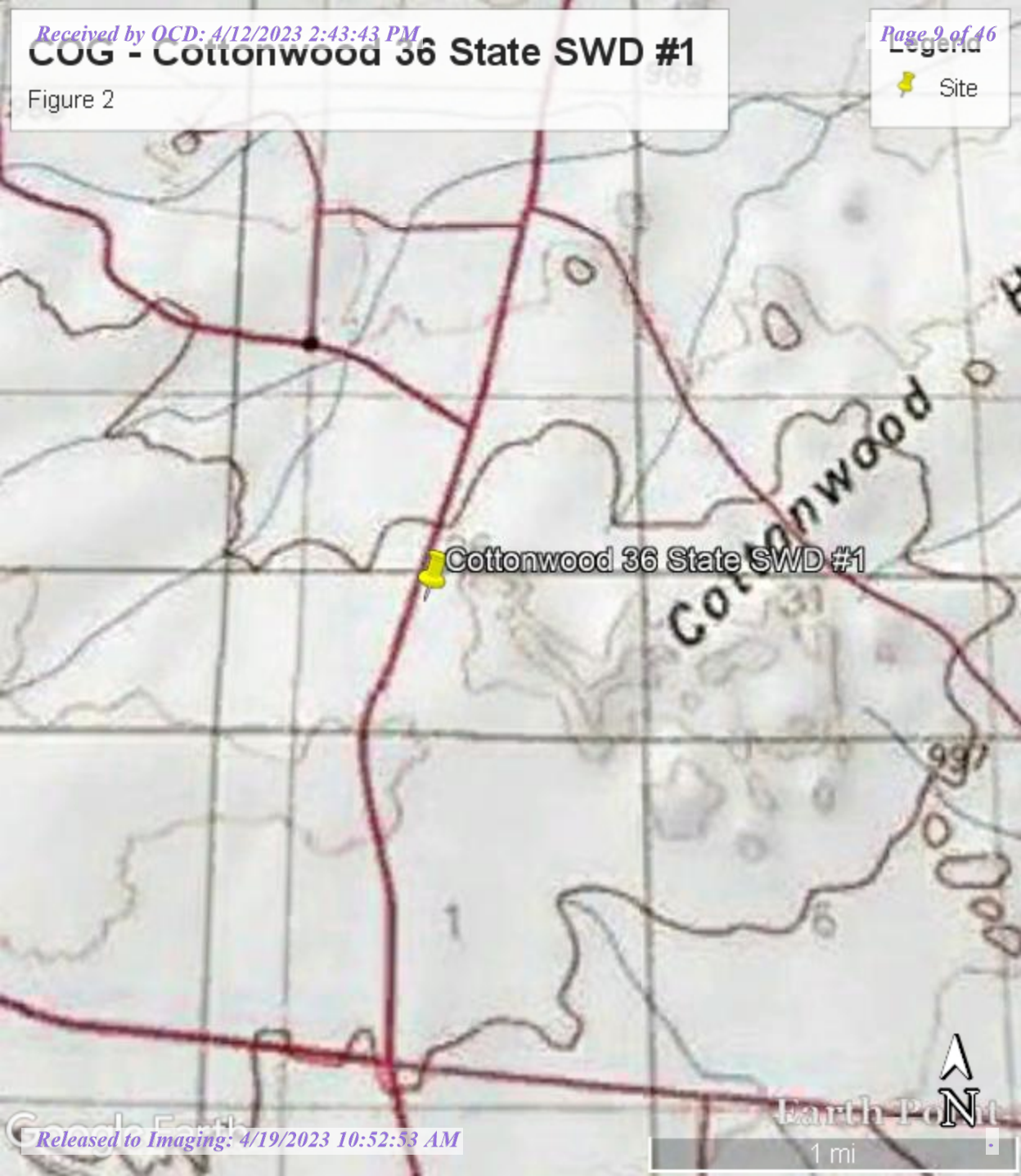
 Site



Figure 2

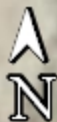


COG - Cottonwood 36 State SWD #1

Figure 3

Legend



-  Release Footprint
-  Sample Point

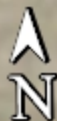


COG - Cottonwood 36 State SWD #1

Figure 4

Legend

-  1' Excavation
-  Sample Point





APPENDIX B

Table 1

TABLE 1 Summary of Delineation Sampling Analytical Results Concentrations of Benzene, BTEX, TPH & Chloride in Soil Concho Operating, LLC Cottonwood 36 State SWD #1 Eddy County, New Mexico NMOCD REF: #2RP-3695												
SAMPLE LOCATION	SAMPLE DEPTH (bgs)	SAMPLE DATE	SOIL STATUS	8021B					8015M			300.0
				BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYLBENZENE (mg/Kg)	XYLENES (mg/Kg)	TOTAL BTEX (mg/Kg)	GRO (mg/Kg)	DRO (mg/Kg)	Total TPH (mg/Kg)	CHLORIDE (mg/Kg)
NMOCD - Guidelines for Remediation of Leaks, Spills and Releases				10	NE	NE	NE	50	NE	NE	100	600
Vertical Delineation Sampling												
S1	Surface	6/15/2016	In-Situ	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	2,480
S1	1'	6/15/2016	In-Situ	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	416
S1	2'	6/15/2016	In-Situ	-	-	-	-	-	-	-	-	544
S1	3'	6/15/2016	In-Situ	-	-	-	-	-	-	-	-	800
S2	Surface	6/15/2016	In-situ	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	4,800
S2	1'	6/15/2016	In-situ	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	800
S2	2'	6/15/2016	In-situ	-	-	-	-	-	-	-	-	288
S2	3'	6/15/2016	In-situ	-	-	-	-	-	-	-	-	560
CS-1 North	-	11/21/2017	In-situ	-	-	-	-	-	-	-	-	122.79
CS-1 South	-	11/21/2017	In-situ	-	-	-	-	-	-	-	-	164.83
CS-1 East	-	11/21/2017	In-situ	-	-	-	-	-	-	-	-	218.90
CS-1 West	-	11/21/2017	In-situ	-	-	-	-	-	-	-	-	112.99
CS-1 Bottom	-	11/21/2017	In-situ	-	-	-	-	-	-	-	-	120.11

mg/Kg - milligrams per Kilogram

— = Not Established

Concentrations in **BOLD** exceed the NMOCD Guidelines

In-situ = sample collected in place

 - existing liner



APPENDIX C

Laboratory Analysis



PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

June 21, 2016

LUPE CARRASCO
COG Operating, LLC
500 W. ILLINOIS
Midland, TX 79701

RE: COTTONWOOD 36 STATE SWD #1

Enclosed are the results of analyses for samples received by the laboratory on 06/15/16 14:15.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-15-7. 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,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

Celey D. Keene
Lab Director/Quality Manager



PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

Analytical Results For:

COG Operating, LLC
 LUPE CARRASCO
 500 W. ILLINOIS
 Midland TX, 79701
 Fax To: None

Received: 06/15/2016
 Reported: 06/21/2016
 Project Name: COTTONWOOD 36 STATE SWD #1
 Project Number: NONE GIVEN
 Project Location: NONE GIVEN

Sampling Date: 06/09/2016
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: S1-SURFACE (H601320-01)

BTEX 80218		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/16/2016	ND	1.96	98.0	2.00	0.357	
Toluene*	<0.050	0.050	06/16/2016	ND	1.99	99.5	2.00	0.686	
Ethylbenzene*	<0.050	0.050	06/16/2016	ND	1.83	91.7	2.00	0.552	
Total Xylenes*	<0.150	0.150	06/16/2016	ND	5.71	95.2	6.00	0.128	
Total BTEX	<0.300	0.300	06/16/2016	ND					

Surrogate: 4-Bromofluorobenzene (PIC) 103 % 73.6-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	2480	16.0	06/17/2016	ND	432	108	400	0.00	

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	06/17/2016	ND	190	95.1	200	0.0594	
DRO >C10-C28	<10.0	10.0	06/17/2016	ND	190	94.8	200	2.04	

Surrogate: 1-Chlorooctane 72.6 % 35-147

Surrogate: 1-Chlorooctadecane 71.1 % 28-171

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

COG Operating, LLC
 LUPE CARRASCO
 500 W. ILLINOIS
 Midland TX, 79701
 Fax To: None

Received: 06/15/2016
 Reported: 06/21/2016
 Project Name: COTTONWOOD 36 STATE SWD #1
 Project Number: NONE GIVEN
 Project Location: NONE GIVEN

Sampling Date: 06/09/2016
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: S1-1' (H601320-02)

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	06/16/2016	ND	1.96	98.0	2.00	0.357	
Toluene*	<0.050	0.050	06/16/2016	ND	1.99	99.5	2.00	0.686	
Ethylbenzene*	<0.050	0.050	06/16/2016	ND	1.83	91.7	2.00	0.552	
Total Xylenes*	<0.150	0.150	06/16/2016	ND	5.71	95.2	6.00	0.128	
Total BTEX	<0.300	0.300	06/16/2016	ND					

Surrogate: 4-Bromofluorobenzene (PIC) 102 % 73.6-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	416	16.0	06/17/2016	ND	432	108	400	0.00	

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	06/17/2016	ND	190	95.1	200	0.0594	
DRO >C10-C28	<10.0	10.0	06/17/2016	ND	190	94.8	200	2.04	

Surrogate: 1-Chlorooctane 57.8 % 35-147

Surrogate: 1-Chlorooctadecane 62.1 % 28-171

Sample ID: S1-2' (H601320-03)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	544	16.0	06/17/2016	ND	432	108	400	0.00	

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* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

COG Operating, LLC
 LUPE CARRASCO
 500 W. ILLINOIS
 Midland TX, 79701
 Fax To: None

Received: 06/15/2016
 Reported: 06/21/2016
 Project Name: COTTONWOOD 36 STATE SWD #1
 Project Number: NONE GIVEN
 Project Location: NONE GIVEN

Sampling Date: 06/09/2016
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: S1-3' (H601320-04)

Chloride, SM4500CI-B		mg/kg	Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	800	16.0	06/17/2016	ND	432	108	400	0.00	

Sample ID: S2-SURFACE (H601320-05)

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	06/16/2016	ND	1.96	98.0	2.00	0.357	
Toluene*	<0.050	0.050	06/16/2016	ND	1.99	99.5	2.00	0.686	
Ethylbenzene*	<0.050	0.050	06/16/2016	ND	1.83	91.7	2.00	0.552	
Total Xylenes*	<0.150	0.150	06/16/2016	ND	5.71	95.2	6.00	0.128	
Total BTEX	<0.300	0.300	06/16/2016	ND					

Surrogate: 4-Bromofluorobenzene (PIC) 101 % 73.6-140

Chloride, SM4500CI-B		mg/kg	Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	4800	16.0	06/17/2016	ND	432	108	400	0.00	

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	06/17/2016	ND	190	95.1	200	0.0594	
DRO >C10-C28	<10.0	10.0	06/17/2016	ND	190	94.8	200	2.04	

Surrogate: 1-Chlorooctane 75.6 % 35-147

Surrogate: 1-Chlorooctadecane 75.3 % 28-171

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* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

Analytical Results For:

COG Operating, LLC
 LUPE CARRASCO
 500 W. ILLINOIS
 Midland TX, 79701
 Fax To: None

Received: 06/15/2016
 Reported: 06/21/2016
 Project Name: COTTONWOOD 36 STATE SWD #1
 Project Number: NONE GIVEN
 Project Location: NONE GIVEN

Sampling Date: 06/09/2016
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: S2-1' (H601320-06)

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	06/16/2016	ND	1.96	98.0	2.00	0.357	
Toluene*	<0.050	0.050	06/16/2016	ND	1.99	99.5	2.00	0.686	
Ethylbenzene*	<0.050	0.050	06/16/2016	ND	1.83	91.7	2.00	0.552	
Total Xylenes*	<0.150	0.150	06/16/2016	ND	5.71	95.2	6.00	0.128	
Total BTEX	<0.300	0.300	06/16/2016	ND					

Surrogate: 4-Bromofluorobenzene (PIC) 101 % 73.6-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	800	16.0	06/17/2016	ND	432	108	400	0.00	

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	06/17/2016	ND	190	95.1	200	0.0594	
DRO >C10-C28	<10.0	10.0	06/17/2016	ND	190	94.8	200	2.04	

Surrogate: 1-Chlorooctane 68.0 % 35-147

Surrogate: 1-Chlorooctadecane 70.9 % 28-171

Sample ID: S2-2' (H601320-07)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	288	16.0	06/17/2016	ND	432	108	400	0.00		

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

Analytical Results For:

COG Operating, LLC
 LUPE CARRASCO
 500 W. ILLINOIS
 Midland TX, 79701
 Fax To: None

Received: 06/15/2016
 Reported: 06/21/2016
 Project Name: COTTONWOOD 36 STATE SWD #1
 Project Number: NONE GIVEN
 Project Location: NONE GIVEN

Sampling Date: 06/09/2016
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: S2-3' (H601320-08)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	560	16.0	06/17/2016	ND	432	108	400	0.00	

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Celey D. Keene, Lab Director/Quality Manager



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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**

[illegible]

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

✓ 5



Certificate of Analysis Summary 569309

American Safety Services, Odessa, TX

Project Name: COG-Cottonwood State 36 SWD #1



Project Id:

Contact: Thomas Franklin

Project Location: Eddy Co., NM

Date Received in Lab: Wed Nov-22-17 03:30 pm

Report Date: 04-DEC-17

Project Manager: Brandi Ritcherson

<i>Analysis Requested</i>	<i>Lab Id:</i>	569309-001	569309-002	569309-003	569309-004	569309-005	
	<i>Field Id:</i>	CS-1 North	CS-1 South	CS-1 East	CS-1 West	CS-1 Bottom	
	<i>Depth:</i>						
	<i>Matrix:</i>	SOIL	SOIL	SOIL	SOIL	SOIL	
	<i>Sampled:</i>	Nov-21-17 13:00	Nov-21-17 13:05	Nov-21-17 13:10	Nov-21-17 13:15	Nov-21-17 13:15	
Chloride by EPA 300	<i>Extracted:</i>	Dec-01-17 13:00	Dec-01-17 13:00	Dec-01-17 13:00	Dec-01-17 13:00	Dec-01-17 13:00	
	<i>Analyzed:</i>	Dec-01-17 19:29	Dec-01-17 19:35	Dec-01-17 19:41	Dec-01-17 19:47	Dec-01-17 19:49	
	<i>Units/RL:</i>	mg/L RL	mg/L RL	mg/L RL	mg/L RL	mg/L RL	
Chloride		122.79 4.9505	164.83 4.9702	218.90 4.9900	112.99 4.9213	120.11 4.9213	

This analytical report, and the entire data package it represents, has been made for your exclusive and confidential use. The interpretations and results expressed throughout this analytical report represent the best judgment of XENCO Laboratories. XENCO Laboratories assumes no responsibility and makes no warranty to the end use of the data hereby presented. Our liability is limited to the amount invoiced for this work order unless otherwise agreed to in writing.

Houston - Dallas - San Antonio - Atlanta - Tampa - Boca Raton - Latin America - Odessa - Corpus Christi

Brandi Ritcherson
Project Manager

Analytical Report 569309

for
American Safety Services

Project Manager: Thomas Franklin

COG-Cottonwood State 36 SWD #1

04-DEC-17

Collected By: Client



1211 W. Florida Ave, Midland TX 79701

Xenco-Houston (EPA Lab code: TX00122):

Texas (T104704215-17-23), Arizona (AZ0765), Florida (E871002-24), Louisiana (03054)
Oklahoma (2017-142)

Xenco-Dallas (EPA Lab code: TX01468):

Texas (T104704295-17-15), Arizona (AZ0809), Arkansas (17-063-0)

Xenco-El Paso (EPA Lab code: TX00127): Texas (T104704221-17-12)

Xenco-Lubbock (EPA Lab code: TX00139): Texas (T104704219-17-16)

Xenco-Odessa (EPA Lab code: TX00158): Texas (T104704400-17-13)

Xenco-San Antonio (EPA Lab Code: TNI02385): Texas (T104704534-17-3)

Xenco Phoenix (EPA Lab Code: AZ00901): Arizona (AZ0757)

Xenco-Phoenix Mobile (EPA Lab code: AZ00901): Arizona (AZM757)



04-DEC-17

Project Manager: **Thomas Franklin**
American Safety Services
8715 Andrews Hwy
Odessa, TX 79765

Reference: XENCO Report No(s): **569309**
COG-Cottonwood State 36 SWD #1
Project Address: Eddy Co., NM

Thomas Franklin:

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the XENCO Report Number(s) 569309. All results being reported under this Report Number apply to the samples analyzed and properly identified with a Laboratory ID number. Subcontracted analyses are identified in this report with either the NELAC certification number of the subcontract lab in the analyst ID field, or the complete subcontracted report attached to this report.

Unless otherwise noted in a Case Narrative, all data reported in this Analytical Report are in compliance with NELAC standards. The uncertainty of measurement associated with the results of analysis reported is available upon request. Should insufficient sample be provided to the laboratory to meet the method and NELAC Matrix Duplicate and Matrix Spike requirements, then the data will be analyzed, evaluated and reported using all other available quality control measures.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by XENCO Laboratories. This report will be filed for at least 5 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in Report No. 569309 will be filed for 45 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting XENCO Laboratories to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

A handwritten signature in black ink that reads 'Brandi Ritcherson'.

Brandi Ritcherson

Project Manager

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Houston - Dallas - Midland - San Antonio - Phoenix - Oklahoma - Latin America

**Sample Cross Reference 569309****American Safety Services, Odessa, TX**

COG-Cottonwood State 36 SWD #1

Sample Id	Matrix	Date Collected	Sample Depth	Lab Sample Id
CS-1 North	S	11-21-17 13:00	In	569309-001
CS-1 South	S	11-21-17 13:05	In	569309-002
CS-1 East	S	11-21-17 13:10	In	569309-003
CS-1 West	S	11-21-17 13:15	In	569309-004
CS-1 Bottom	S	11-21-17 13:15	In	569309-005



CASE NARRATIVE

Client Name: American Safety Services

Project Name: COG-Cottonwood State 36 SWD #1

Project ID:

Work Order Number(s): 569309

Report Date: 04-DEC-17

Date Received: 11/22/2017

Sample receipt non conformances and comments:

Sample receipt non conformances and comments per sample:

None



Certificate of Analytical Results 569309



American Safety Services, Odessa, TX

COG-Cottonwood State 36 SWD #1

Sample Id: CS-1 North

Matrix: Soil

Date Received: 11.22.17 15.30

Lab Sample Id: 569309-001

Date Collected: 11.21.17 13.00

Analytical Method: Chloride by EPA 300

Prep Method: E300P

Tech: MNV

% Moisture:

Analyst: MNV

Date Prep: 12.01.17 13.00

Basis: Wet Weight

Seq Number: 3034798

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	122.79	4.9505	mg/L	12.01.17 19.29		1



Certificate of Analytical Results 569309



American Safety Services, Odessa, TX

COG-Cottonwood State 36 SWD #1

Sample Id: CS-1 South

Matrix: Soil

Date Received: 11.22.17 15.30

Lab Sample Id: 569309-002

Date Collected: 11.21.17 13.05

Analytical Method: Chloride by EPA 300

Prep Method: E300P

Tech: MNV

% Moisture:

Analyst: MNV

Date Prep: 12.01.17 13.00

Basis: Wet Weight

Seq Number: 3034798

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	164.83	4.9702	mg/L	12.01.17 19.35		1



Certificate of Analytical Results 569309



American Safety Services, Odessa, TX

COG-Cottonwood State 36 SWD #1

Sample Id: CS-1 East

Matrix: Soil

Date Received: 11.22.17 15.30

Lab Sample Id: 569309-003

Date Collected: 11.21.17 13.10

Analytical Method: Chloride by EPA 300

Prep Method: E300P

Tech: MNV

% Moisture:

Analyst: MNV

Date Prep: 12.01.17 13.00

Basis: Wet Weight

Seq Number: 3034798

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	218.90	4.9900	mg/L	12.01.17 19.41		1



Certificate of Analytical Results 569309



American Safety Services, Odessa, TX

COG-Cottonwood State 36 SWD #1

Sample Id: CS-1 West

Matrix: Soil

Date Received: 11.22.17 15.30

Lab Sample Id: 569309-004

Date Collected: 11.21.17 13.15

Analytical Method: Chloride by EPA 300

Prep Method: E300P

Tech: MNV

% Moisture:

Analyst: MNV

Date Prep: 12.01.17 13.00

Basis: Wet Weight

Seq Number: 3034798

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	112.99	4.9213	mg/L	12.01.17 19.47		1



Certificate of Analytical Results 569309



American Safety Services, Odessa, TX

COG-Cottonwood State 36 SWD #1

Sample Id: **CS-1 Bottom**

Matrix: Soil

Date Received: 11.22.17 15.30

Lab Sample Id: 569309-005

Date Collected: 11.21.17 13.17

Analytical Method: Chloride by EPA 300

Prep Method: E300P

Tech: MNV

% Moisture:

Analyst: MNV

Date Prep: 12.01.17 13.00

Basis: Wet Weight

Seq Number: 3034799

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	112.99	4.9213	mg/L	12.01.17 19.47		1



Flagging Criteria



- X** In our quality control review of the data a QC deficiency was observed and flagged as noted. MS/MSD recoveries were found to be outside of the laboratory control limits due to possible matrix /chemical interference, or a concentration of target analyte high enough to affect the recovery of the spike concentration. This condition could also affect the relative percent difference in the MS/MSD.
- B** A target analyte or common laboratory contaminant was identified in the method blank. Its presence indicates possible field or laboratory contamination.
- D** The sample(s) were diluted due to targets detected over the highest point of the calibration curve, or due to matrix interference. Dilution factors are included in the final results. The result is from a diluted sample.
- E** The data exceeds the upper calibration limit; therefore, the concentration is reported as estimated.
- F** RPD exceeded lab control limits.
- J** The target analyte was positively identified below the quantitation limit and above the detection limit.
- U** Analyte was not detected.
- L** The LCS data for this analytical batch was reported below the laboratory control limits for this analyte. The department supervisor and QA Director reviewed data. The samples were either reanalyzed or flagged as estimated concentrations.
- H** The LCS data for this analytical batch was reported above the laboratory control limits. Supporting QC Data were reviewed by the Department Supervisor and QA Director. Data were determined to be valid for reporting.
- K** Sample analyzed outside of recommended hold time.
- JN** A combination of the "N" and the "J" qualifier. The analysis indicates that the analyte is "tentatively identified" and the associated numerical value may not be consistent with the amount actually present in the environmental sample.

** Surrogate recovered outside laboratory control limit.

BRL Below Reporting Limit.

RL Reporting Limit

MDL Method Detection Limit **SDL** Sample Detection Limit **LOD** Limit of Detection

PQL Practical Quantitation Limit **MQL** Method Quantitation Limit **LOQ** Limit of Quantitation

DL Method Detection Limit

NC Non-Calculable

+ NELAC certification not offered for this compound.

* (Next to analyte name or method description) = Outside XENCO's scope of NELAC accreditation

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 5332 Blackberry Drive, San Antonio TX 78238
 1211 W Florida Ave, Midland, TX 79701
 2525 W. Huntington Dr. - Suite 102, Tempe AZ 85282

Phone	Fax
(281) 240-4200	(281) 240-4280
(214) 902 0300	(214) 351-9139
(210) 509-3334	(210) 509-3335
(432) 563-1800	(432) 563-1713
(602) 437-0330	



American Safety Services
COG-Cottonwood State 36 SWD #1

Analytical Method: Chloride by EPA 300

Seq Number: 3034798

MB Sample Id: 7635271-1-BLK

Matrix: Solid

LCS Sample Id: 7635271-1-BKS

Prep Method: E300P

Date Prep: 12.01.17

LCSD Sample Id: 7635271-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	<5.0000	250.00	255.00	102	246.60	99	90-110	3	20	mg/L	12.01.17 17:07	

Analytical Method: Chloride by EPA 300

Seq Number: 3034798

Parent Sample Id: 569304-006

Matrix: Soil

MS Sample Id: 569304-006 S

Prep Method: E300P

Date Prep: 12.01.17

MSD Sample Id: 569304-006 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	1082.0	248.00	1277.7	79	1273.5	77	90-110	0	20	mg/L	12.01.17 17:25	X

Analytical Method: Chloride by EPA 300

Seq Number: 3034798

Parent Sample Id: 569305-003

Matrix: Soil

MS Sample Id: 569305-003 S

Prep Method: E300P

Date Prep: 12.01.17

MSD Sample Id: 569305-003 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	<4.9900	250.00	276.22	110	274.98	110	90-110	0	20	mg/L	12.01.17 18:48	



Setting the Standard since 1990
 Stafford, Texas (281-240-4200)
 Dallas Texas (214-902-0300)

CHAIN OF CUSTODY

Page 1 of 1

Phoenix, Arizona (480-355-0900)
 San Antonio, Texas (210-509-3334)
 Midland, Texas (432-704-5251)

www.xenco.com

Client / Reporting Information				Project Information				Xenco Quote #		Xenco Job #		Analytical Information		Matrix Codes		
Company Name / Branch: American Safety Services Inc.				Project Name/Number: 6061 - Cottonwood State 36 SWD #1										W = Water S = Soil/Sed/Solid GW = Ground Water DW = Drinking Water P = Product SL = Sludge OW = Ocean/Sea Water WI = Wipe O = Oil WW = Waste Water A = Air		
Company Address: 8715 Andrews Hwy Odessa TX 79765				Project Location: Eddy Co NM												
Phone No: 432-557-9868				Invoice To: Cobo-ATTN Becky Huskell												
Email: franklin@americansafety.net				PO Number:												
Project Contact: Thomas Franklin																
Sampler's Name: Ryan Beck																
No.	Field ID / Point of Collection	Sample Depth	Date	Time	Matrix	# of bottles	Number of preserved bottles						Field Comments			
1	CS-1 North	-	4/12/17	1300	S	1	HCl	NO ₂ /H-Zn	HNO ₃	H ₂ SO ₄	NaOH	NaHSO ₄	MeOH	NONE	on Tree	
2	" South	-		1305												
3	" East	-		1310												
4	" West	-		1315												
5	11 Bottom	-	4/21/17	1317	U	1										
6																
7																
8																
9																
10																
Turnaround Time (Business days)		Notes:														
<input type="checkbox"/> Same Day TAT <input checked="" type="checkbox"/> 5 Day TAT <input type="checkbox"/> Next Day EMERGENCY <input type="checkbox"/> 7 Day TAT <input type="checkbox"/> 2 Day EMERGENCY <input type="checkbox"/> Contract TAT <input type="checkbox"/> 3 Day EMERGENCY		Level II Std QC <input type="checkbox"/> Level IV (Full Data Pkg / raw data) Level III Std QC+ Forms <input type="checkbox"/> TRRP Level IV Level 3 (CLP Forms) <input type="checkbox"/> UST / RG -411 TRRP Checklist <input type="checkbox"/>														
TAT Starts Day received by Lab, if received by 5:00 pm																
SAMPLE CUSTODY MUST BE DOCUMENTED BELOW EACH TIME SAMPLES CHANGE POSSESSION, INCLUDING COURIER DELIVERY																
Relinquished by Sampler:		Date Time:		Received By:		Date Time:		Relinquished By:		Date Time:		Received By:		Date Time:		
1		4/12/17 1300		1		11/22/17 1300		2		11/22/17 15:30		2		11/22/17 15:30		
3				3				4				4				
5				5				Custody Seal #		Preserved where applicable		On Ice <input checked="" type="checkbox"/>		Cooler Temp. Thermo. Corr. Factor		

Notice: Signature of this document and relinquishment of samples constitutes a valid purchase order from client company to Xenco, its affiliates and subcontractors. It assigns standard terms and conditions of service. Xenco will be liable for losses or expenses incurred by the Client if such losses are due to circumstances beyond the control of Xenco. A minimum charge of \$75 will be applied to each project. Xenco's liability will be limited to the cost of samples. Any samples receive will be enforced unless previously negotiated under a fully executed client contract.

Temp: 54 IR ID: R-8

CF: (0-6: -0.2°C)

(6-23: +0.2°C)

Corrected Temp: 5.2



XENCO Laboratories

Prelogin/Nonconformance Report- Sample Log-In



Client: American Safety Services

Date/ Time Received: 11/22/2017 03:30:00 PM

Work Order #: 569309

Acceptable Temperature Range: 0 - 6 degC

Air and Metal samples Acceptable Range: Ambient

Temperature Measuring device used : R8

Sample Receipt Checklist**Comments**

#1 *Temperature of cooler(s)?	5.2
#2 *Shipping container in good condition?	Yes
#3 *Samples received on ice?	Yes
#4 *Custody Seals intact on shipping container/ cooler?	N/A
#5 Custody Seals intact on sample bottles?	N/A
#6 *Custody Seals Signed and dated?	N/A
#7 *Chain of Custody present?	Yes
#8 Any missing/extra samples?	No
#9 Chain of Custody signed when relinquished/ received?	Yes
#10 Chain of Custody agrees with sample labels/matrix?	Yes
#11 Container label(s) legible and intact?	Yes
#12 Samples in proper container/ bottle?	Yes
#13 Samples properly preserved?	Yes
#14 Sample container(s) intact?	Yes
#15 Sufficient sample amount for indicated test(s)?	Yes
#16 All samples received within hold time?	Yes
#17 Subcontract of sample(s)?	No
#18 Water VOC samples have zero headspace?	N/A

* Must be completed for after-hours delivery of samples prior to placing in the refrigerator

Analyst:

PH Device/Lot#:

Checklist completed by:

Shawnee Smith

Date: 11/27/2017

Checklist reviewed by:

Brandi Ritcherson

Date: 11/27/2017



APPENDIX D

Initial and Final C-141

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.	432-683-7443
Facility Name:	COTTONWOOD 36 STATE SWD #001	Facility Type:	SWD

Surface Owner:	State	Mineral Owner:		API No.	30-015-29560
----------------	-------	----------------	--	---------	--------------

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
K	35	25S	26E	1980	South	1980	West	Eddy

Latitude 32.0844536

Longitude 104.2486954

NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: 5bbls of Produced Water	Volume Recovered: 3bbls of Produced Water
Source of Release: Injection Well	Date and Hour of Occurrence: 05-06-2016 11:00am	Date and Hour of Discovery: 05-06-2016 11:00am
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.*

The threading on the collar above the master valve washed out. Replaced the collar on the wellhead.

Describe Area Affected and Cleanup Action Taken.*

The release caused a 20' X 5' staining on the pad by the wellhead. Concho has replaced the collar on the wellhead and 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: Robert Grubbs Jr.	Approved by Environmental Specialist:	
Title: Senior Environmental Coordinator	Approval Date:	Expiration Date:
E-mail Address: rgrubbs@concho.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: 05-16-2016 Phone: 432-683-7443		

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 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: COG Operating LLC	Contact: Rebecca Haskell
Address: 600 West Illinois Avenue, Midland TX 79701	Telephone No.: 432-683-7443
Facility Name: Cottonwood 36 State SWD #001	Facility Type: SWD

Surface Owner: Federal	Mineral Owner: State	API No.: 30-015-29560
------------------------	----------------------	-----------------------

LOCATION OF RELEASE

Unit Letter K	Section 35	Township 25S	Range 26E	Feet from the 1980	North/South Line South	Feet from the 1980	East/West Line West	County Eddy
------------------	---------------	-----------------	--------------	-----------------------	---------------------------	-----------------------	------------------------	----------------

Latitude 32.0844536 Longitude -104.2486954

NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: 5 bbls	Volume Recovered: 3 bbls
Source of Release: Injection Well	Date and Hour of Occurrence: 5/06/2016; 11:00am	Date and Hour of Discovery: 5/06/2016; 11:00am
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: N/A	
If a Watercourse was Impacted, Describe Fully.* N/A		
Describe Cause of Problem and Remedial Action Taken. *Job was assigned New Mexico Order #2RP-3695* The release was caused when the threading collar above the master valve washed out. The release was contained to the production pad of the well. Concho sampled the spill and assigned the spill to ASSI who then remediated the spill according to the approved work plan.		
Describe Area Affected and Cleanup Action Taken.* The site was remediated by ASSI in 2017, impacted material was excavated and sent to R-360 for proper disposal. Confirmation samples were collected and sent to an NMOCD approved laboratory, which determined Chloride levels were less than the NMOCD regulatory standards. Subsequently, the site was backfilled and the surface has been restored.		
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: <i>Brian Hall</i>	
Title: Senior HSE Coordinator	Approval Date: 4/19/2023	Expiration Date: N/A
E-mail Address: rhaskell@concho.com	Conditions of Approval: none	Attached <input type="checkbox"/>
Date: December 7, 2017 Phone: 432-683-7443		

Attach Additional Sheets If Necessary



APPENDIX E

Waste Manifest



TEXAS NON-HAZARDOUS OILFIELD WASTE MANIFEST

(PLEASE PRINT)

REQUIRED INFORMATION

Company Man Contact Information

Name Rebecca HaskellPhone No. 432-556-5130

GENERATOR

NO. 75738

Operator No. _____

Operators Name COG

Address _____

City, State, Zip _____

Phone No. _____

Permit/RRC No. _____

Lease/Well

Name & No. Cottonwood 36 State SWD#County EddyAPI No. 30-015-39660Rig Name & No. MOD- drilling

AFE/PO No. _____

EXEMPT E&P Waste/Service Identification and Amount (place volume next to waste type in barrels or cubic yards)

Oil Based Muds	NON-INJECTABLE WATERS	OTHER EXEMPT WASTES (type and generation process of the waste)
Oil Based Cuttings	Washout Water (Non-Injectable)	<u>Belly dump</u>
Water Based Muds	Completion Fluid/Flow back (Non-Injectable)	
Water Based Cuttings	Produced Water (Non-Injectable)	
Produced Formation Solids	Gathering Line Water/Waste (Non-Injectable)	
Tank Bottoms	INTERNAL USE ONLY	
E&P Contaminated Soil	Truck Washout (exempt waste)	
Gas Plant Waste		

WASTE GENERATION PROCESS: ☐ DRILLING ☐ COMPLETION ☐ PRODUCTION ☐ GATHERING LINES

NON-EXEMPT E&P Waste/Service Identification and Amount

All non-exempt E&P waste must be analysed and be below the threshold limits for toxicity (TCLP), Ignitability, Corrosivity and Reactivity.

Non-Exempt Other _____

*please select from Non-Exempt Waste List on back

QUANTITY B - BARRELS 20 Y - YARDS E - EACH

I hereby certify that the above listed material(s), is (are) not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law. That each waste has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulation.

☐ RCRA EXEMPT: Oil field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste (R360 Accepts certifications on a per load basis only)☐ RCRA NON-EXEMPT: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24, or listed hazardous waste as defined by 40 CFR, part 261, subpart D, as amended. The following documentation demonstrating the waste as non-hazardous is attached. (Check the appropriate items as provided)☐ MSDS Information ☐ RCRA Hazardous Waste Analysis ☐ Other (Provide Description Below)

(PRINT) AUTHORIZED AGENTS SIGNATURE

DATE

SIGNATURE

TRANSPORTER

Transporter's Name ASI

Address _____

Phone No. (515) 746-1096Driver's Name Abel RIVERAPrint Name Abel RIVERAPhone No. 432-381-9515Truck No. 1130

I hereby certify that the above named material(s) was/were picked up at the Generator's site listed above and delivered without incident to the disposal facility listed below.

SHIPMENT DATE

DRIVER'S SIGNATURE

DELIVERY DATE

DRIVER'S SIGNATURE

TRUCK TIME STAMP

IN: 11:36am OUT: _____

DISPOSAL FACILITY

RECEIVING AREA

Name/No. T3

Site Name/

Permit No. Red Bluff Facility/ STF-065Address 5053 US Highway 285, Orla, TX 79770Phone No. 432-448-4239

NORM READINGS TAKEN? (Circle One)

YES

NO

If YES, was reading > 50 micro roentgens? (circle one)

YES

NO

Chemical Analysis (Mg/l)

Chloride

Conductivity (mmhos/cm)

pH

TANK BOTTOMS

	Feet	Inches
1st Gauge		
2nd Gauge		
Received		

BS&W/BBLs Received	BS&W (%)
Free Water	
Total Received	

I hereby certify that the above load material has been (circle one):

ACCEPTED

DENIED

If denied, why?

marie corella9-20-17reccienAbel Rivera

NAME (PRINT)

DATE

TITLE

SIGNATURE



TEXAS NON-HAZARDOUS OILFIELD WASTE MANIFEST

(PLEASE PRINT)

REQUIRED INFORMATION

Company Man Contact Information

Name Rebecca HaskellPhone No. 432-381-9515

GENERATOR

NO. 75738

Operator No. _____

Operators Name CCG

Address _____

City, State, Zip _____

Phone No. _____

Permit/RRC No. _____

Lease/Well

Name & No. Chenwood 36 State SWCounty EdleyAPI No. 30-013-29060Rig Name & No. NON-drilling

AFE/PO No. _____

EXEMPT E&P Waste/Service Identification and Amount (place volume next to waste type in barrels or cubic yards)

Oil Based Muds	NON-INJECTABLE WATERS	OTHER EXEMPT WASTES (type and generation process of the waste)
Oil Based Cuttings	Washout Water (Non-Injectable)	<u>Belly dump</u>
Water Based Muds	Completion Fluid/Flow back (Non-Injectable)	
Water Based Cuttings	Produced Water (Non-Injectable)	
Produced Formation Solids	Gathering Line Water/Waste (Non-Injectable)	
Tank Bottoms	INTERNAL USE ONLY	
E&P Contaminated Soil	Truck Washout (exempt waste)	
Gas Plant Waste		

WASTE GENERATION PROCESS: ☐ DRILLING ☐ COMPLETION ☐ PRODUCTION ☐ GATHERING LINES

NON-EXEMPT E&P Waste/Service Identification and Amount

All non-exempt E&P waste must be analysed and be below the threshold limits for toxicity (TCLP), Ignitability, Corrosivity and Reactivity.

Non-Exempt Other _____

*please select from Non-Exempt Waste List on back

QUANTITY 20 B - BARRELS Y - YARDS E - EACH

I hereby certify that the above listed material(s), is (are) not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law. That each waste has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulation.

☐ RCRA EXEMPT:

Oil field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste (R360 Accepts certifications on a per load basis only)

☐ RCRA NON-EXEMPT:

Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24, or listed hazardous waste as defined by 40 CFR, part 261, subpart D, as amended. The following documentation demonstrating the waste as non-hazardous is attached. (Check the appropriate items as provided)

☐ MSDS Information☐ RCRA Hazardous Waste Analysis☐ Other (Provide Description Below)(PRINT) AUTHORIZED AGENTS SIGNATURE Rebecca Haskell (Verbal authorization) 9-20-17

DATE

SIGNATURE

TRANSPORTER

Transporter's

Name ASI

Address _____

Phone No. (3515) 746-1096Driver's Name Abel R. VieraPrint Name Abel R. VieraPhone No. 432-381-9515Truck No. 1120

I hereby certify that the above named material(s) was/were picked up at the Generator's site listed above and delivered without incident to the disposal facility listed below.

SHIPMENT DATE 9-20-17DRIVER'S SIGNATURE Abel R. VieraDELIVERY DATE 9-20-17DRIVER'S SIGNATURE Abel R. Viera

TRUCK TIME STAMP

IN: 11:36 am OUT: _____

DISPOSAL FACILITY

RECEIVING AREA

Name/No. T3

Site Name/

Permit No. Red Bluff Facility/ STF-065Address 5053 US Highway 285, Orla, TX 79770Phone No. 432-448-4239

NORM READINGS TAKEN? (Circle One)

YES

NO

If YES, was reading > 50 micro roentgens? (circle one)

YES

NO

Chemical Analysis (Mg/l) _____

Conductivity (mmhos/cm) _____

pH _____

TANK BOTTOMS

	Feet	Inches
1st Gauge		
2nd Gauge		
Received		

BS&W/BBLs Received		BS&W (%)	
Free Water			
Total Received			

I hereby certify that the above load material has been (circle one):

ACCEPTED

DENIED

If denied, why? _____

NAME (PRINT) marie corellaDATE 9-20-17TITLE ReceiverSIGNATURE Rebecca Haskell



TEXAS NON-HAZARDOUS OILFIELD WASTE MANIFEST

(PLEASE PRINT)

REQUIRED INFORMATION

Company Man Contact Information

Name

Phone No.

GENERATOR

NO. 75740

Operator No.

Operator's Name

Address

City, State, Zip

Phone No.

Permit/RRC No.

Lease/Well

Name & No.

County

API No.

Rig Name & No.

AFE/PO No.

Cottonwood 36 State SWD #1
Eddy Co NM
30-015-29360
Non-Drilling

EXEMPT E&P Waste/Service Identification and Amount (place volume next to waste type in barrels or cubic yards)

Oil Based Muds	NON-INJECTABLE WATERS	OTHER EXEMPT WASTES (type and generation process of the waste)
Oil Based Cuttings	Washout Water (Non-Injectable)	Belly Dump
Water Based Muds	Completion Fluid/Flow back (Non-Injectable)	
Water Based Cuttings	Produced Water (Non-Injectable)	
Produced Formation Solids	Gathering Line Water/Waste (Non-Injectable)	
Tank Bottoms	INTERNAL USE ONLY	
E&P Contaminated Soil	Truck Washout (exempt waste)	
Gas Plant Waste		

WASTE GENERATION PROCESS: ☐ DRILLING ☐ COMPLETION ☐ PRODUCTION ☐ GATHERING LINES

NON-EXEMPT E&P Waste/Service Identification and Amount

All non-exempt E&P waste must be analysed and be below the threshold limits for toxicity (TCLP), Ignitability, Corrosivity and Reactivity.

Non-Exempt Other

*please select from Non-Exempt Waste List on back

QUANTITY

B - BARRELS

20 Y - YARDS

E - EACH

I hereby certify that the above listed material(s), is (are) not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law. That each waste has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulation.

☐ RCRA EXEMPT:

Oil field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste (R360 Accepts certifications on a per load basis only)

☐ RCRA NON-EXEMPT:

Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24, or listed hazardous waste as defined by 40 CFR, part 261, subpart D, as amended. The following documentation demonstrating the waste as non-hazardous is attached. (Check the appropriate items as provided)

☐ MSDS Information☐ RCRA Hazardous Waste Analysis☐ Other (Provide Description Below)

Rebecca Haskell (006) Ryan Reich (ASE) 9/21/17
(PRINT) AUTHORIZED AGENTS SIGNATURE

TRANSPORTER

Transporter's

Name

Address

Phone No.

Driver's Name

Print Name

Phone No.

Truck No.

ASE

3715 Andrews Hwy

(575) 746-1096

Abel Rivera

Abel Rivera

432-381-9515

1130

I hereby certify that the above named material(s) was/were picked up at the Generator's site listed above and delivered without incident to the disposal facility listed below.

9-21-17

SHIPMENT DATE

Abel R

DRIVER'S SIGNATURE

9-21-17

DELIVERY DATE

Abel R

DRIVER'S SIGNATURE

TRUCK TIME STAMP

DISPOSAL FACILITY

RECEIVING AREA

IN: 12:53pm

OUT:

Name/No.

T-3

Site Name/

Permit No.

Address

Red Bluff Facility/ STF-065

5053 US Highway 285, Orla, TX 79770

Phone No.

432-448-4239

NORM READINGS TAKEN? (Circle One)

YES

NO

If YES, was reading > 50 micro roentgens? (circle one)

YES

NO

Chemical Analysis (Mg/l)

2518

Conductivity (mmhos/cm)

6.65

8.2 pH

TANK BOTTOMS

1st Gauge

2nd Gauge

Received

Feet

Inches

BS&W/BBLS Received

Free Water

Total Received

BS&W (%)

I hereby certify that the above load material has been (circle one):

ACCEPTED

DENIED

If denied, why?

Hernice Calderon 9/21/17
NAME (PRINT) DATE

TITLE

SIGNATURE

White - ORIGINAL

Blue - TRANSPORTER

Yellow - GENERATOR

Version 1

Hall, Brittany, EMNRD

From: Tucker, Shelly <stucker@blm.gov>
Sent: Thursday, December 28, 2017 10:53 AM
To: Ryan Reich
Cc: Weaver, Crystal, EMNRD; Bratcher, Mike, EMNRD; James Amos; Rebecca Haskell; Dakota Neel; Sheldon Hitchcock; Thomas Franklin
Subject: [External] Re: Remediation Summary and Closure Request 2RP-3695

**** External email. Use caution. ****

BLM accepts your closure request for the Cottonwood 36 State Com 001 * 2RP-3695.

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

Sincerely,

Shelly J Tucker

Environmental Protection Specialist
O&G Spill/Release Coordinator

Bureau of Land Management
620 E. Greene St
Carlsbad, NM 88220

575.234.5905 - Direct
575.361.0084 - Cellular
575.234.6235 - Emergency Spill Number

stucker@blm.gov

The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. In such an event that the location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until the contaminant issues are fully mitigated and the location is successfully reclaimed. In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

Confidentiality Warning: This message along with any attachments are intended only for use of the individual or entity to which it is addressed and may contain information that is privileged or confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately.

On Tue, Dec 12, 2017 at 2:25 PM, Ryan Reich <rreich@americansafety.net> wrote:

Ms. Tucker and Ms. Weaver,

Please find attached the Remediation Summary and Closure Request for 2RP-3695.

Thank you,

Ryan Reich

Environmental Project Manager

Mobile 432.557.7963

Office 432.552.7625



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 206986

CONDITIONS

Operator: SOLARIS WATER MIDSTREAM, LLC 907 Tradewinds Blvd, Suite B Midland, TX 79706	OGRID: 371643
	Action Number: 206986
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

Created By	Condition	Condition Date
bhall	None	4/19/2023