

**HRL**
COMPLIANCE
SOLUTIONSP.O. Box 1708 • Artesia, NM 88211
www.hrlcomp.com

July 28, 2018

NMOCD District I
Olivia Yu
1625 North French Drive
Hobbs, New Mexico 88240Bureau of Land Management
Henryetta Price
620 E Greene Street
Carlsbad, New Mexico 88220SUBJECT: FINAL CLOSURE PLAN FOR THE INCIDENT AT THE GC Federal #031 (1RP-4629), LEA COUNTY,
NEW MEXICO

Ms. Yu:

On behalf of COG Operating, LLC, HRL Compliance Solutions, Inc (HRL) is pleased to submit the attached final closure report summarizing the finding and closure actions located on the GC Federal #031 release. The purpose of the report is to obtain approval from the New Mexico Oil Conservation Division (NMOCD) for the remediation and closure of the release that occurred on March 1, 2017. Table 1 below summarizes information regarding the release.

1.0 Background

The release at the GC Federal #031 was caused due to equipment failure from a hole that occurred on a fitting (nipple) connected to the pumping tee as outlined in the NMOCD C-141 report (Appendix A). All released material remained on location within the perimeter of the well pad, isolated around the wellhead. A vacuum truck was used to remove all freestanding liquid. Samples were collected from the impacted area to delineate the vertical and horizontal extent of impacts.

2.0 Site Ranking and Land Jurisdiction

The release site is located approximately 3.3 miles south-southwest of Maljamar, with an elevation of approximately 4595 feet above sea level. After evaluation of the site using the Chevron Texaco Groundwater Trend Map (2005), depth to groundwater was estimated at 175 feet below ground surface (bgs).

Recommended Remediation Action Levels (RRALs) are determined by the site ranking according to the NMOCD *Guidelines for Remediation of Leaks, Spills, and Releases* (1993). The site ranking for this location was 0 as documented in the approved work plan.

**Table 1: Release Information and Site Ranking**

Name	GC Federal #031
Company	COG Operating, LLC
RP Number	1RP-4629
API Number	30-025-39266
Location	32.81433889, -103.7909611
Estimated Date of Release	3/1/2017
Date Reported to NMOCD	3/3/2017
Land Owner	Federal
Reported to	OCD/BLM
Source of Release	Hole in a pumping tee
Released Material	Oil and Produced Water
Released Volume	5 bbls oil, 5 bbls produced water
Recovered Volume	4.5 bbls oil, 4.5 bbls produced water
Net Release Volume	0.5 bbls oil, 0.5 bbls water
Nearest Waterway	9.1 miles to White Lake
Depth to Groundwater	175 feet bgs
Nearest Domestic Water Source	> 1 mile
NMOCD Ranking	0
Response Date	3/2/2018

3.0 Assessment

On June 19, 2018, after receiving clearance, HRL field personnel supervised the excavation of the area in accordance to the approved work plan. Confirmation sampling for T2 bottom, T2 West wall, T2 East wall, T2 North wall, T2 South wall, and sample point West bottom have been included for your consideration. During excavation, field sampling was taken which required further excavation than originally stated in the approved work plan. The areas of T2 bottom, T2 East wall and T2 West wall required further excavation to remediate the impacted areas. The area around T2 was excavated to approximately 3.5' while the original area was expanded slightly to the east and west. All contaminated soil was removed and disposed at an approved NMOCD disposal facility.

4.0 Conclusion

The excavated areas have been back filled to its original state with appropriate material from a licensed caliche pit. No further remedial activities are recommended.

5.0 Revegetation Plan

The facility is still in production and requires no vegetation plan. All excavation occurred on the production pad.



6.0 Scope and Limitations

The scope of HRL's services consist of performing site characterization and remediation, verification of release stabilization, regulatory liaison, and preparation of this work plan. All work has been performed in accordance with generally accepted professional environmental consulting practices for oil and gas releases in the Permian Basin in New Mexico.

If there are any questions regarding this report, please contact Jennifer Knowlton at 505-238-3588.

Submitted by:
HRL Compliance Solutions, Inc

A handwritten signature in blue ink that reads "Jennifer Knowlton". The signature is fluid and cursive.

Jennifer Knowlton
Regional Manager - Permian

Attachments:

Figure 1: Site and Sample Location Map

Table 3: Summary of Sample Results

Appendix A: Form C141 Initial

Appendix B: Laboratory Analytical Reports



Appendix B: Laboratory Analytical Reports

**Table 1: Release Information and Site Ranking**

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Company	COG Operating, LLC
RP Number	1RP-4629
API Number	30-025-39266
Location	32.81433889, -103.7909611
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If there are any questions regarding this report, please contact Jennifer Knowlton at 505-238-3588.

Submitted by:
HRL Compliance Solutions, Inc

Jennifer Knowlton
Regional Manager - Permian

Attachments:

Figure 1: Site and Sample Location Map

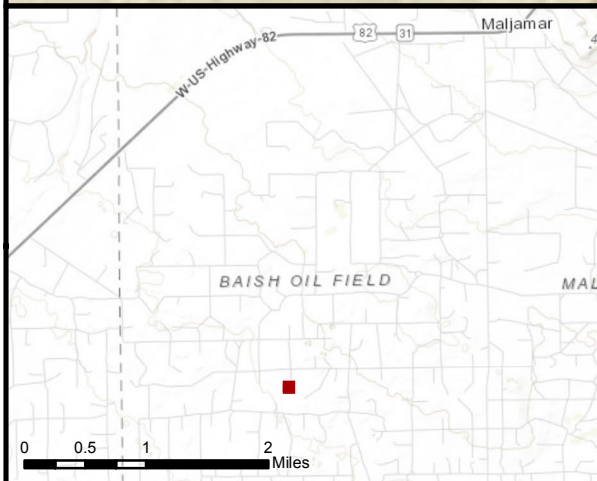
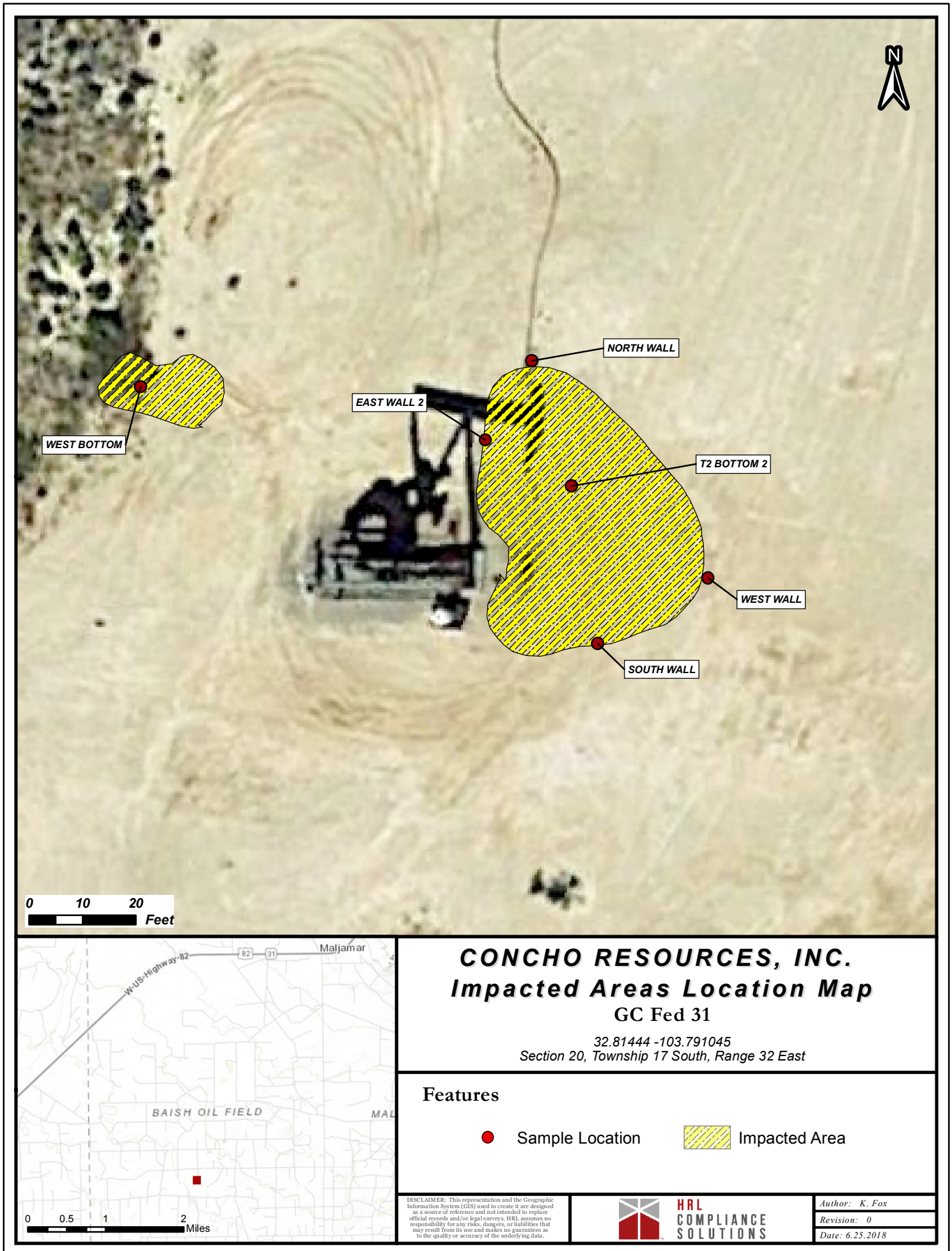
Table 3: Summary of Sample Results

Appendix A: Form C141 Initial

Appendix B: Laboratory Analytical Reports



Figure 1:
Site and Sample Location Map



CONCHO RESOURCES, INC. Impacted Areas Location Map GC Fed 31

32.81444 -103.791045
Section 20, Township 17 South, Range 32 East

Features

- Sample Location ■ Impacted Area

DISCLAIMER: This representation and the Geographic Information System (GIS) used to create it are designed as a source of reference and not intended to replace official records and/or legal surveys. HRL assumes no responsibility for any risks, dangers, or liabilities that may result from its use and makes no guarantee as to the quality or accuracy of the underlying data.



HRL
COMPLIANCE
SOLUTIONS

Author: K. Fox
Revision: 0
Date: 6.25.2018



TABLE 3			
Summary of Delineation Sampling Analytical Results			
SAMPLE LOCATION	SAMPLE DEPTH (bgs)	SAMPLE DATE	CHLORIDE (mg/Kg)
NMOCD - Guidelines for Remediation of Leaks, Spills and Releases			600
T2 - West Wall 1	1.5'	6/19/2018	1,500.0
T2 - West Wall 2	1.5'	6/21/2018	256.0
T2 - North Wall	1.5'	6/19/2018	64.0
T2 - South Wall	1.5'	6/19/2018	16
T2 - East Wall 1	1.5'	6/21/2018	864
T2 - East Wall 2	1.5'	6/21/2018	112
T2 - Bottom 1	2.5'	6/19/2018	1,120.0
T2 - Bottom 2	3'	6/21/2018	592.0
West Bottom	0.5'	6/19/2018	80.0



Appendix A: Form C141 Final

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: Robert McNeill
Address: 600 West Illinois Avenue, Midland TX 79701	Telephone No: 432-230-0077
Facility Name: GC Federal #031	Facility Type: Wellhead
Surface Owner: Federal	Mineral Owner: Federal
API No.30-025-39266	

LOCATION OF RELEASE

Unit Letter N	Section 20	Township 17S	Range 32E	Feet from the 525	North/South Line South	Feet from the 1960	East/West Line West	County Lea
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Latitude 32.8142929 Longitude -103.7908478 NAD83

NATURE OF RELEASE

Type of Release: Oil and Produced Water	Volume of Release: 5 bbls oil and 5 bbl PW	Volume Recovered: 4.5 bbls Oil and 4.5 bbls PW
Source of Release: Wellhead	Date and Hour of Occurrence March 1, 2017 Unknown	Date and Hour of Discovery: March 1, 2017 11:00AM
Was Immediate Notice Given? <input type="checkbox"/> Yes <input 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 occurred due to a hole in a nipple on the pumping tee. The damaged nipple was replaced with a new nipple.

Describe Area Affected and Cleanup Action Taken.*

This release remained on location around the wellhead. A vacuum truck was dispatched to remove all freestanding fluids. Concho delineated the area and a work plan was submitted and approved. HRL removed the contaminated soil, slightly beyond the original work plan, and took confirmation samples. The area was backfilled and recontoured. No revegetation was necessary as the excavation was only on the production pad.

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: Rebecca Haskell		Approved by Environmental Specialist: 	
Title: Senior Environmental Coordinator	Approval Date: 5/8/2023	Expiration Date: N/A	
E-mail Address: rhaskell@concho.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: June 28, 2018	Phone: 432-683-7443		none

* Attach Additional Sheets If Necessary



Appendix B: Laboratory Analytical Reports



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

June 20, 2018

DAKOTA NEEL

COG OPERATING

P. O. BOX 1630

ARTESIA, NM 88210

RE: GC FEDERAL #31

Enclosed are the results of analyses for samples received by the laboratory on 06/19/18 15:00.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-17-10. 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
 DAKOTA NEEL
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

Received: 06/19/2018
 Reported: 06/20/2018
 Project Name: GC FEDERAL #31
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 06/19/2018
 Sampling Type: Soil
 Sampling Condition: ** (See Notes)
 Sample Received By: Tamara Oldaker

Sample ID: T2 - WEST WALL (H801664-01)

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1500	16.0	06/20/2018	ND	416	104	400	0.00	

Sample ID: T2 - NORTH WALL (H801664-02)

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	06/20/2018	ND	416	104	400	0.00	

Sample ID: T2 - SOUTH WALL (H801664-03)

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	06/20/2018	ND	416	104	400	0.00	

Sample ID: T2 - BOTTOM (H801664-04)

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1120	16.0	06/20/2018	ND	416	104	400	0.00	

Cardinal Laboratories

*=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
DAKOTA NEEL
P. O. BOX 1630
ARTESIA NM, 88210
Fax To: NONE

Received: 06/19/2018
Reported: 06/20/2018
Project Name: GC FEDERAL #31
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 06/19/2018
Sampling Type: Soil
Sampling Condition: ** (See Notes)
Sample Received By: Tamara Oldaker

Sample ID: WEST BOTTOM (H801664-05)**Chloride, SM4500Cl-B****mg/kg****Analyzed By: HM**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	06/20/2018	ND	416	104	400	0.00	

Cardinal Laboratories

*=Accredited Analyte

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A handwritten signature in black ink, appearing to read "Celey D. Keene".

Celey D. Keene, Lab Director/Quality Manager



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

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

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



ANALYSIS REQUEST

Released to Imaging: 5/8/2023 1:37:58 PM



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

June 22, 2018

DAKOTA NEEL

COG OPERATING

P. O. BOX 1630

ARTESIA, NM 88210

RE: GC FEDERAL #31

Enclosed are the results of analyses for samples received by the laboratory on 06/21/18 11:59.

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Sincerely,

A handwritten signature in black ink that reads "Mike Snyder". The signature is fluid and cursive, with the first name "Mike" and last name "Snyder" clearly distinguishable.

Mike Snyder For Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

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

Received:	06/21/2018	Sampling Date:	06/21/2018
Reported:	06/22/2018	Sampling Type:	Soil
Project Name:	GC FEDERAL #31	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	NOT GIVEN		

Sample ID: GC FED #31 T2 EAST WALL (H801695-01)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	864	16.0	06/21/2018	ND	432	108	400	3.77	

Sample ID: GC FED #31 T2 WEST WALL (H801695-02)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	256	16.0	06/21/2018	ND	432	108	400	3.77	

Sample ID: GC FED #31 T2 BOTTOM @3' (H801695-03)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	592	16.0	06/21/2018	ND	432	108	400	3.77	

Sample ID: GC FED #31 T2 EAST WALL 2 (H801695-04)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	112	16.0	06/21/2018	ND	432	108	400	3.77	

Cardinal Laboratories

*=Accredited Analyte

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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

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RPD	Relative Percent Difference
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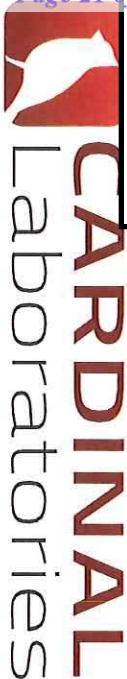
Cardinal Laboratories

*=Accredited Analyte

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A handwritten signature in black ink, appearing to read "Mike Snyder", is written over a horizontal line.

Mike Snyder For 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]

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 206294

CONDITIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 206294
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

Created By	Condition	Condition Date
bhall	None	5/8/2023