SITE INFORMATION

		Rep	ort Type: W	/ork Pl	an	
General Site In	formation:					
Site:		GJ West Co	op Unit #7	n an thail an a dia ana gu ann an agus an		n na serie and an
Company:		COG Operat	ing LLC	- <u></u>	· .	
Section, Town	ship and Range	Unit H	Sec 28	T17S	R29E	
Lease Number	r:	API-30-015-0	3170			
County:		Eddy Count	y			
GPS:			32.80643° N			104.07265° W
Surface Owner	r:	State				
Mineral Owner	?	_				
Directions:		From the inter- onto CR212 a	section of Hwy 529 nd travel 0.7 miles	and CR 2 ⁻ to site.	17, travel west	t on Hwy 529 for 5.1 miles. Turn left
Release Data:						
Date Released:	,	9/4/2010				
Type Release:		Produced Flu	id			
Source of Conta	amination:	Steel Flowline	Э		·····	
Fluide Released	: adi	10 DDIS				
FILIUS HECOVER			SPERIFE M. V. M. RASKIN			
	unication:		T CARE OF CARE	年月期后中的		
Name:	Pat Ellis	Pat Ellis			Ike Tavare	2
Company:	COG Operating, L	COG Operating, LLC			Tetra Tech	1
Address:	550 W. Texas Ave	550 W. Texas Ave. Ste. 1300			1910 N. Bi	g Spring
P.O. Box						
City:	Midland Texas, 79	701			Midland, T	exas
Phone number:	(432) 686-3023				(432) 425-	3878
Fax:	(432) 684-7137					······································
Email:	pellis@conchoresc	ources.com		ike.tavarez@tetratech.com		
Ranking Criter	ia					
Depth to Group	dwator:		Banking Score	1		Site Data
<50 ft	umaiçi.		20	+		
50-99 ft			10			
>100 ft.	······································		0			0
WellHead Protec	ction:		Banking Score	1		Site Data
Water Source <1	1,000 ft., Private <200	ft.	20	+		
Water Source >1	1,000 ft., Private >200	ft.	0			0
Surface Body of	f Water:		Ranking Score			Site Data
<200 ft.			20			
200 ft - 1,000 ft.			• 10			
>1,000 ft.			0			U
	otal Ranking Score		0			RECEIVED
		Accepta Benzene	ble Soil RRAL (mg/kg)		JUN 03 2011
				1 0,000		MOCD ARTESIA
with the processing of the second states of the		and the second secon	A.A., 444 A. A. A. A. T	an many service of the a		and a second

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May 9, 2011

Mr. Mike Bratcher Environmental Engineer Specialist Oil Conservation Division, District 2 1301 West Grand Avenue Artesia, New Mexico 88210

Re: Work Plan for the COG Operating LLC., GJ West Coop Unit #7 Flow Line, Unit H, Section 28, Township 17 South, Range 29 East, Eddy County, New Mexico.

Mr. Bratcher:

Tetra Tech, Inc. (Tetra Tech) was contacted by COG Operating LLC. (COG) to assess a spill from the GJ West Coop Unit #7 Flow Line located in Unit H, Section 28, Township 17 South, Range 29 East, Eddy County, New Mexico (Site). The spill site coordinates are N 32.80643°, W 104.07265°. The site location is shown on Figures 1 and 2.

Background

According to the State of New Mexico C-141 Initial Report, the leak was discovered on September 4, 2010, and released approximately ten (10) barrels of produced fluid from a steel flow line. To alleviate the problem, COG personnel replaced the line with a poly line. Eight (8) barrels of standing fluids were recovered. The spill initiated southwest of the well pad and affected an area 15' x 70' in the pasture. The initial and final C-141 forms are enclosed in Appendix A.

Groundwater

No water wells were listed within Section 28. The Geology and Groundwater Resources of Eddy County, New Mexico (Report 3) shows wells_in_Section_29_and_Section_22;-with-a-depth-to-groundwater of 210' and 80' below surface. According to the NMOCD groundwater map, the average

Tetra Tech



depth to groundwater in this area is greater than 100' below surface. The average depth to groundwater map is shown in Appendix B.

Regulatory

A risk-based evaluation was performed for the Site in accordance with the New Mexico Oil Conservation Division (NMOCD) Guidelines for Remediation of Leaks, Spills and Releases, dated August 13, 1993. The guidelines require a risk-based evaluation of the site to determine recommended remedial action levels (RRAL) for benzene, toluene, ethylbenzene and xylene (collectively referred to as BTEX) and total petroleum hydrocarbons (TPH) in soil. The proposed RRAL for benzene was determined to be 10 parts per million (ppm) or milligrams per kilogram (mg/kg) and 50 ppm for total BTEX (sum of benzene, toluene, ethylbenzene, and xylene). Based upon the depth to groundwater, the proposed RRAL for TPH is 5,000 mg/kg.

Soil Assessment and Analytical Results

On September 1, 2010, Tetra Tech personnel inspected and sampled the spill area. One (1) auger hole (AH-1) was installed using a stainless steel hand auger to assess the impacted soils. Select samples were analyzed for TPH analysis by EPA method 8015 modified, BTEX by EPA Method 8021B and chloride by EPA method 300.0. Copies of laboratory analysis and chain-of-custody documentation are included in Appendix C. The results of the sampling are summarized in Table 1. The auger hole location is shown on Figure 3.

Referring to Table 1, none of the samples for TPH and BTEX exceeded the RRAL. Elevated chloride concentrations were detected ranging from 1,740 mg/kg at 0-1' to 14,300 mg/kg at 3-3.5'. The chloride impact was not vertically defined. In order to delineate the chloride impact, a soil boring was installed utilizing an air rotary drilling rig.

On February 17, 2011, Tetra Tech personnel supervised the installation of one soil boring (SB-1). Soil samples were collected to a depth of 30.0' below surface. Referring to Table 1, the soil boring did show a shallow impact to soil, compared AH-1. Elevated chloride concentrations were detected from surface to 5.0' and significantly declined to 399 mg/kg at 7.0' below surface. Copies of laboratory analysis and chain-of-custody documentation are included in Appendix-C. The soil boring results are summarized in Table 1. The soil boring location is shown on Figure 3.



Work Plan

In order to remediate the site, COG proposes to excavate the impacted soils. The goal of the remediation is to establish surface growth and to reduce the environmental liabilities for the protection of the groundwater. COG proposes to remove impacted material as highlighted (green) in Table 1. Based on the data, the excavation depths may range from 7.0' to 10.0' below surface. To properly remove the impacted soils, Tetra Tech will collect bottom hole samples and field screen for chlorides. Once excavated to the appropriate depths, the excavation will be backfilled with clean soil.

Based on the site formation, the proposed excavation depths may not be reached due to wall cave ins and safety concerns for onsite personnel. In addition, impacted soil around oil and gas equipment, structures or lines may not be feasible or practicable to be removed due to safely concerns. As such, Tetra Tech will excavate the soils to the maximum extent practicable. If the depths are not reached, a 40 mil liner will be installed at depth of 4' to 5' below surface to cap the impacted area.

Upon completion, a final report will be submitted to the NMOCD. If you have any questions or comments concerning the assessment or the proposed remediation activities for this site, please call me at (432) 682-4559.

Respectfully submitted,

TETRATECH

Iké Távàrez, &G Senior Project Manager

cc: Pat Ellis - COG

Figures





Drawn By: Isabel Marmolejo



Drawn By Isabel Marmolejo

Photos







View West – AH-1



View West – AH-1



View North East – AH-1

Tables

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Table 1COG Operating LLC.GJ WEST CO-OP #7Eddy County, New Mexico

Sample	Sample	Sample	Depth	Soil	Status	TI	PH (mg/k	g) Benzene Toluene	Toluene	Ethlybenzene	Xylene	Chloride	
ID	Date	Depth (ft)	(BEB)	In-Situ	Removed	GRO	DRO	Total	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
AH-1	9/22/2010	0 -1		X		940	3,270	4,210	<0.500	6.58	10.5	13.5	1,740
•	U	1-1.5		X		2,360	2,380	4,740				. .	3,720
	81	* 2-2.5		X		.330	289	619	مر کر برد و روا در در در از مرد در در در در مرد			-	12,600
1	н	3-3.5		X									14,300
1	u	4-4.5'		X	÷								8,560
	11	5-5.5'		X.	اد د. اد		· -		• , .			: , - ,	6,390
1		6-6.5'		X					-		•		7,900
1 		7-7.5		X				*					2,790
	11	8-8.5'		X			· • ·					-	3,660
		9-9.5'		X					2 			-	3,230
		- 20 - 2	<u>,</u>	2.6.92		<u> </u>	· · · · · · · · · · · · · · · · · · ·	· · · · ·				······································	
SB-1	2/17/2011	0-1	1	X					، به ۲۰۰۰ کې د ۲۰۰۰ کې				1,040
	ti	૾ૼૣૺૼ૽ૼૢૼૼૼ ૱		X									9,380
	18	ີ 5'		X							444 July 44		4,180
	a	7'		Х	· · · · · · · ·	-	-	-		-	-	-	399
	"	10'		х		-	-	-	-	-	-	-	<200
	u	15'		х		-	-	-	-	-	-	-	<200
	11	20'		Х		-	-	-	-	-	-	-	<200
	11	25'	_	Х		-	-	-	-	-	-	-	<200
	u	30'		Х		-	-	-	-	-	-	-	<200

BEB Below Excavation Bottom

(--) Not Analyzed

Proposed excavation depths

1

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Appendix A

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District I 1625 N. French Dr., Hobbs, NM 88240 District II 1301 W. Grand Avenue, Artesia, NM 88210 District III 1000 Rio Brazos Road, Aztee, 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

DGSS Form C-141 Revised October 10, 2003

Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

9			Rele	ease Notifi	catior	1 and Co	orrective A	ction		9 11 - 11 - 11 - 11 - 11 - 11 - 11 - 11	ديرة فنقار العلى علم مناركة	
						OPERAT	<u>FOR</u>		🛛 Initi	al Report		Final Re
Name of Co	mpany	COG OP	ERATIN	IG LLC		Contact	P.	at Ellis				
Address	550 W.	Texas, Suite	COORT	dland, 1X /9/0	<u>n</u>	Lelephone M	$\frac{10.}{2}$	230-007	/			
raciny Na		UJ WEST	COOP	JINTI #7				Ownne				
Surface Ow	ner State	9		Mineral (Owner				Lease 1	No. B-25	5	
					······································	·· _ · - · · · · · · · · · · · · · · · ·			L	(API	#)30-	015-03170
				LOC	ATIO	N OF REI	LEASE					
Unit Letter H	Section 28	Township 17S	Range 29E	Feet from the	North/	South Line	Feet from the	East/W	est Line	County	Eddy	
	1			Latitude 32	48.380	Longitu	ide 104 04.374	<u>.</u>		J		
(D) (D) (NAT	FURE	OF RELI	EASE					
Source of Re	ase Produ	leed fluid				Date and H	Release Tubbis	<u></u>	Volume I	Recovered Hour of Dis	8bbls	<u>.</u>
				09/04/2010			09/04/20	10 4:00	p.m.	7		
Was Immediate Notice Given?				equired	If YES. To	Whom?					.1	
By Whom?				Date and H	lour			EN	ドレ			
Was a Water	course Read	ched?	Yes 🗵	No		II YES, Vo	lume Impacting t	the Water	COUTIESC.E		2011	
If a Waterco	arse was lin	pacted. Deser	ibe Fully.	*						JUN P	RTE	SIA
Describe Cau	ise of Probl	em and Reme	dial Actio	n Taken.*					141			
The steel flow	vline devel	oped a weak s	pot and ev	contually ruptured	l causing	this release.	The steel flowlin	e will he	replaced	with a new p	ooly fle	owline.
Describe Are	a Affected	and Cleanup	Action Tal	ken.*								
Initially 10bl measured 15 R29E, 2260 ⁷ will present a	ols was relea x 40' in th FNL 330' l a remediatio	ased from the le pasture. (T FEL. Eddy Ce on work plan t	ruptured f he closest ounty, NM o the NM	flowline and we w well location to th). Tetra Tech will OCD prior to any	vere able he releas l sample significa	to recover 8b c is the GJ W the spill site a int remediation	bls with a vacuur est COOP Unit # area to delineate a m work.	n truck. 65, API# iny possib	The dime 30-015-2. ble contan	nsions of the 5131, Unit F nination fror	relea: 1. Sec. n the r	se area 28-T17S- elease and v
I hereby certi regulations a public health should their o or the enviro federal, state	fy that the ll operators or the envi operations l nment. In a , or local la	information g are required to ronment. The nave failed to addition. NMC ws and/or reg	iven above o report a acceptan adequately OCD accep ulations.	e is true and comp nd/or file certain ce of a C-141 rep y investigate and otance of a C-141	olete to the release n ort by the remediate report d	ne best of my otifications ar 2 NMOCD ma 2 contaminations of the	knowledge and u nd perform correc arked as "Final R on that pose a thr e the operator of (nderstand etive actio eport" do cat to gro responsib	I that purs ons for reli- es not reli- und water ility for co	want to NM eases which eve the oper y surface wa ompliance w	OCD r may c rator o iter, hu rith an	ules and ndanger f liabilny iman health y other
		~				_	OIL CON	SERVA	ATION	DIVISIC	<u>)N</u>	
Signature:			1	/		-						
Printed Nam	e:	Josl	n Russo	<u> </u>		Approved by	District Supervise	or:				
Title:		HSE C	oordinato	r		Approval Dat	е:	E:	xpiration 1	Date.		
-E-mail-Addr	ess:	jrusso@con	choresour	ces.com		Conditions of	Approval:		 .	Attached		
Ale: 09/14	/2010	Phone:	432-2	12-2399						<u> </u>		
anacii Addi	uonat She	CES IT INCUCS	bai y									

Appendix B

Water Well Data Average Depth to Groundwater (ft) COG - GJ West Coop Unit #7 Eddy County, New Mexico

17 South

208' 32

Site 33

29 210 28

	16	South	1	28 East	t
6	5	4	3	2	1
7	8	9	10	11	12
18	17	16	15	14	13
19	20	21 61	22	23	24
30	29	28	27	26	25
31	32	33	34	35	36

	17 South 28 East								
6	5	4	3	2	1				
7	8	9	10	11	12				
18	17	16	15	14	13				
19	20	21	22 79	23	24				
30	29	28	27	26	25				
31	32	33	34 53	35	36				

	16	South		t	
6	5	4	3	2	1
7	8	9	10	11	12
18	17	16	15	14	13
19 110	20	21	22	23	24
30	29	28	27	26	25
31	32	33	34	35	36

29 East

	_16 Sc	outh	30	East
6	5	4	3	2
7	8	9	10	11
18	17	16	15	14
19	20	21	22	23
30	29	28	27	26
31	32	33	34	35

	17 Sc	outh	30	East
6	5	4	3	2
7	8	9	10	11
18	17	16	15	14
19	20	21	22	23
30	29	28	27	26
31	32	33	34	35

30 East

	18 9	South	outh 28 East			
6	5	4	3	2	1	
7	8	9	10	11	12	
18	17	16	15	14	13	
19	20	21	22	23	24	
30	29	28	27	26	25	
31	32	33	34	35	36	

				1 <u>5</u> 3	
	18 Se	outh	29	East	
6	5	4	3	2	1
7	8	9	10	11	12
18	17	16	15	14	13
19	20	21	22	23	24
30	29	28	27	26	25
31	32	33	34	35	36

st	st 18 South					
1		6	5	4		
12		7	8	9		
13		18	17	16		
24		19	20	21		
25		30	29	28		
36		31	32	33		

New Mexico State Engineers Well Reports

USGS Well Reports

Geology and Groundwater Conditions in Southern Eddy, County, NM

NMOCD - Groundwater Data

Appendix C

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.

Summary Report

Tom Franklin Tetra Tech 1910 N. Big Spring Street Midland, TX 79705

Report Date: October 5, 2010

Work Order: 10092339

continued

Project Location:Eddy County, NMProject Name:COG/GJ West Co-op #7Project Number:114-6400689

			Date	Time	Date
Sample	Description	" Matrix	Taken	Taken	Received
245657	AH-1 0-1'	soil	2010-09-22	00:00	2010-09-23
245658	AH-1 1-1.5'	soil	2010-09-22	00:00	2010-09-23
245659	AH-1 2-2.5'	soil	2010-09-22	00:00	2010-09-23
245660	AH-1 3-3.5'	soil	2010-09-22	00:00	2010-09-23
245661	AH-1 4-4.5'	soil	2010-09-22	00:00	2010-09-23
245662	AH-1 5-5.5'	soil	2010-09-22	00:00	2010-09-23
245663	AH-1 6-6.5'	soil	2010-09-22	00:00	2010-09-23
245664	AH-1 7-7.5'	soil	2010-09-22	00:00	2010-09-23
245665	AH-1 8-8.5'	soil	2010-09-22	00:00	2010-09-23
245666	AH-1 9-9.5'	soil	2010-09-22	00:00	2010-09-23

	·····]	BTEX		TPH DRO - NEW	TPH GRO
	Benzene	Toluene	Ethylbenzene	Xylene	DRO	GRO
Sample - Field Code	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)
245657 - AH-1 0-1'	< 0.500	6.58	10.5	13.5	3270	940
245658 - AH-1 1-1.5'					2380	2360
245659 - AH-1 2-2.5'					289	330

Sample: 245657 - AH-1 0-1'

Param	Flag	Result	Units	RL
Chloride		1740	mg/Kg	4.00

Sample: 245658 - AH-1 1-1.5'

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Report Date: October 5, 2010		Work Order: 10092339	Page Number: 2 of 3	
sample 245658 contr	inued			
Param	Flag	Result	Units	RL
Param	Flag	Result	Units	\mathbf{RL}
Chloride		3720	mg/Kg	4.00
Sample: 245659 -	AH-1 2-2.5'			-
Param	Flag	Result	Units	BL
Chloride	0	12600	mg/Kg	4.00
Sample: 245660 -	AH-1 3-3.5'			
Param	Flag	Result	Units	\mathbf{RL}
Chloride	·····	14300	mg/Kg	4.00
Sample: 245661 -	AH-1 4-4.5'			
Param	Flag	Result	Units	RL
Chloride		8560	mg/Kg	4.00
Sample: 245662 -	AH-1 5-5.5'			
Param	Flag	Result	Units	\mathbf{RL}
Chloride		6390	mg/Kg	4.00
Sample: 245663 -	AH-1 6-6.5'			
Param	Flag	Result	· Units	RL
Chloride		7900	mg/Kg	4.00
Sample: 245664 -	AH-1 7-7.5'			
		Besult	Units	RL
Param	Flag	1000 0000		

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Report Date: October 5, 2010		Work Order: 10092339	Page Number: 3 of 3	
Param	Flag	Result	Units	RL
Chloride		3660	mg/Kg	4.00
Sample: 245666	- AH-1 9-9.5'			
Param	Flag	Result	Units	RL
Chloride		3230	mg/Kg	4.00

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Summary Report

Tom Franklin Tetra Tech 1910 N. Big Spring Street Midland, TX 79705

Report Date: February 24, 2011

Work Order: 11022110

Project Location:Eddy County, NMProject Name:COG/GJ West Co-op #7Project Number:114-6400689

			Date	Time	Date
Sample	Description	Matrix	Taken	Taken	Received
258143	SB-1 0-1'	soil	2011-02-17	00:00	2011-02-21
258144	SB-1 3'	soil	2011-02-17	00:00	2011 - 02 - 21
258145	SB-1 5'	soil	2011-02-17	00:00	2011-02-21
258146	SB-1 7'	soil	2011-02-17	00:00	2011-02-21
258147	SB-1 10'	soil	2011-02-17	00:00	2011-02-21
258148	SB-1 15'	soil	2011-02-17	00:00	2011-02-21
258149	SB-1 20'	soil	2011-02-17	00:00	2011-02-21
258150	SB-1 25'	soil	2011-02-17	00:00	2011-02-21
258151	SB-1 30'	soil	2011-02-17	00:00	2011-02-21

Sample: 258143 - SB-1 0-1'

Param	Flag	Result	Units	RL
Chloride		1040	mg/Kg	4.00

Sample: 258144 - SB-1 3'

Param	Flag	Result	Units	RL
Chloride		9380	mg/Kg	4.00

5

_____ continued ..._

Sample: 258145 - SB-1 5'

TraceAnalysis, Inc. • 6701 Aberdeen Ave., Suite 9 • Lubbock, TX 79424-1515 • (806) 794-1296 This is only a summary. Please, refer to the complete report package for quality control data.

Report Date: Febru	ary 24, 2011	Work Order: 11022110	2110 Page Numb	
sample 258145 cont	tinued			
Param	Flag	Result	Units	RL
Param	Flag	Result	Units	RL
Chloride		- 4180	mg/Kg	4.00
Sample: 258146 -	- SB-1 7'			
Param	Flag	Result	Units	RL
Chloride		399	mg/Kg	4.00
Sample: 258147 -	- SB-1 10'			
Param	Flag	Result	Units	RL
Chloride		<200	mg/Kg	4.00
Sample: 258148 -	· SB-1 15'			
Param	Flag	Result	Units	\mathbf{RL}
Chloride		<200	mg/Kg	4.00
Sample: 258149 -	· SB-1 20'			
Param	Flag	Result	Units	RL
Chloride		<200	mg/Kg	4.00
Sample: 258150 -	· SB-1 25'			
Param	Flag	Result	Units	\mathbf{RL}
Chloride		<200	mg/Kg	4.00
Sample: 258151 -	· SB-1 30'			
Param	Flag	Result	Units	RL
Chloride		<200	mg/Kg	4.00

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