



August 26, 2019

Mike Bratcher
Oil Conservation Division, District 2
811 S First Street
Artesia, NM 88210

Closure Report:

Graham Cracker 2 State #001H
API#: 30-015-42282
RP#: Not Assigned
DOR: August 13, 2019
GPS: 32.061273 -104.066506
Unit Letter A, Section 8, Township 26 South, Range 28 East
Eddy County, New Mexico

Mr. Bratcher,

COG Operating, LLC (COG) is pleased to submit the following closure report in response to a release that occurred on a flowline associated with the Graham Cracker 2 State #001H. The release was located in Unit Letter A, Section 8, Township 26 South and Range 28 East in Eddy County, New Mexico. More specifically the latitude and longitude for the release are 32.061273 North and -104.066506 West.

BACKGROUND

The release occurred on August 13, 2010. The release was caused by a third party striking a flowline while in the process of installing a bell hole for a road boring. The line strike resulted in the release of approximately seventy-four (74) barrels (bbls) of produced water. A vacuum truck was utilized to recover approximately twenty (20) bbls of produced water. All of the fluid was contained within the bell hole which was approximately fourteen (14) feet deep at the time of the line strike. Due to the small surface area, the presence of an active one-call and equipment on site remediation activities began immediately following the release.

GROUNDWATER AND REGULATORY FRAMEWORK

According to the United States Geological Survey (USGS) the nearest water well with measurement data (320309104020401) indicates that groundwater in the project vicinity is approximately one-hundred and forty (140) feet below ground surface (BGS). The water well information is shown in Appendix B.

A risk based evaluation and site determinations were performed in accordance to the New Mexico Oil Conservation Division (NMOCD) Rule (Title 19 Chapter 15 Part 29) for releases on oil and gas development and production in New Mexico (effective August 14, 2018). According to the site characterization evaluation the release was in a medium karst potential area, no other receptors (water wells, playas, water course, lake beds or ordinance boundaries) were located within each specific boundaries or distance from the site. The groundwater data and the site characterization evaluation data is summarized in Appendix B. The delineation and closure criteria are listed below:

GENERAL SITE CHARACTERIZATION AND GROUNDWATER:

Site Characterization	Average Groundwater Depth (ft.)
Medium Karst Potential	140 feet

DELINEATION AND CLOSURE CRITERIA:

Table I Closure Criteria	
Chlorides	600 mg/kg
TPH (GRO and DRO and MRO)	100 mg/kg
TPH (GRO and DRO)	N/A
Benzene	10 mg/kg
Total BTEX	50 mg/kg

Remedial Actions

- All of the fluid was contained within a bell hole that was excavated to facilitate a road boring. The bell hole was advanced vertically and horizontally using visual observations and field chloride titrations to guide the extent of the excavation.
- All of the excavated material was hauled to an NMOCD approved solid waste disposal facility.
- Confirmation soil samples were taken from the bottom and sidewalls of the excavated areas per NMAC 19.15.29.

- Upon receipt of acceptable analytical results from the confirmation soil sampling activities the excavation was backfilled with clean “like” material.

SITE RECLAMATION AND RESTORATION

All of the fluid remained on the county road right-of-way. No reclamation activities will be required at this site.

CLOSURE REQUEST

COG Operating, LLC respectfully requests that the New Mexico Oil Conservation Division grant closure approval for the Graham Cracker 2 State #001H incident that occurred on August 13, 2019.

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

Sincerely,



Sheldon L. Hitchcock
HSE Coordinator
shitchcock@concho.com

FIGURES

August 13, 2019

Graham Cracker 2 St. #001H

Legend
Excavated Area



TABLES

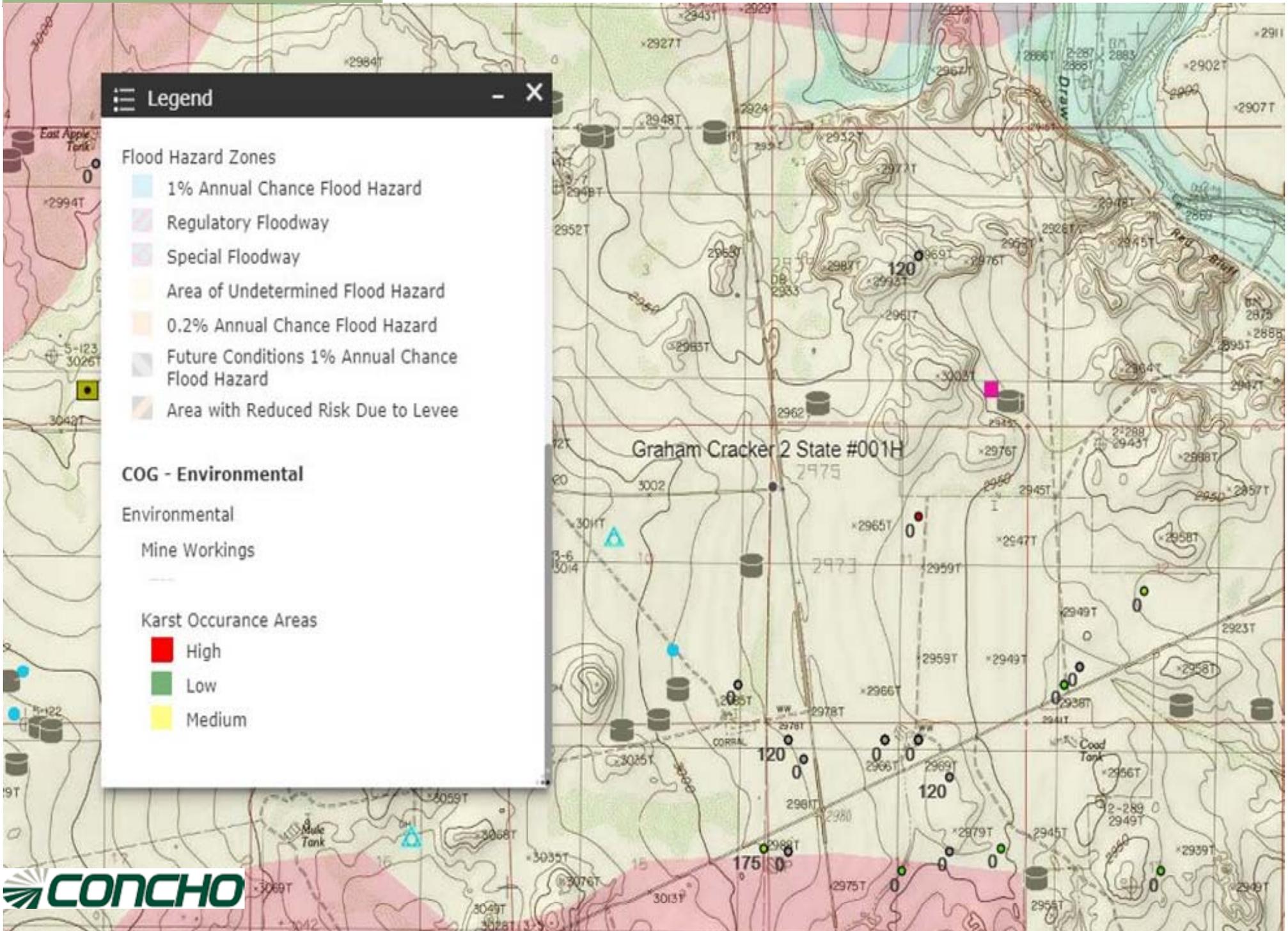
Table 1
COG Operating LLC.
Graham Cracker 2 St. Com #001
Lea County, New Mexico

Sample ID	Sample Depth (ft)	Sample Date	Soil Status		TPH (mg/kg)							Benzene (mg/kg)	Total BTEX (mg/kg)	Chloride (mg/kg)
			In-Situ	Removed	GRO	DRO	MRO	Total	GRO	DRO	Total			
NMOCD RRAL Limits (mg/kg)					-	-	-	2,500	-	-	1,000	10	50	20,000
BTTM-1	16	8/14/2019	X		<10.0	<10.0	<10.0	0.0	<10.0	<10.0	0.0	<0.050	<0.300	256
BTTM-2	16	8/15/2019	X		<10.0	<10.0	<10.0	0.0	<10.0	<10.0	0.0	<0.050	<0.300	64
N. SIDEWALL	N/A	8/16/2019	X		<10.0	<10.0	<10.0	0.0	<10.0	<10.0	0.0	<0.050	<0.300	48
S. SIDEWALL	N/A	8/17/2019	X		<10.0	<10.0	<10.0	0.0	<10.0	<10.0	0.0	<0.050	<0.300	64
E. SIDEWALL	N/A	8/18/2019	X		<10.0	<10.0	<10.0	0.0	<10.0	<10.0	0.0	<0.050	<0.300	64
W. SIDEWALL	N/A	8/19/2019	X		<10.0	<10.0	<10.0	0.0	<10.0	<10.0	0.0	<0.050	<0.300	112

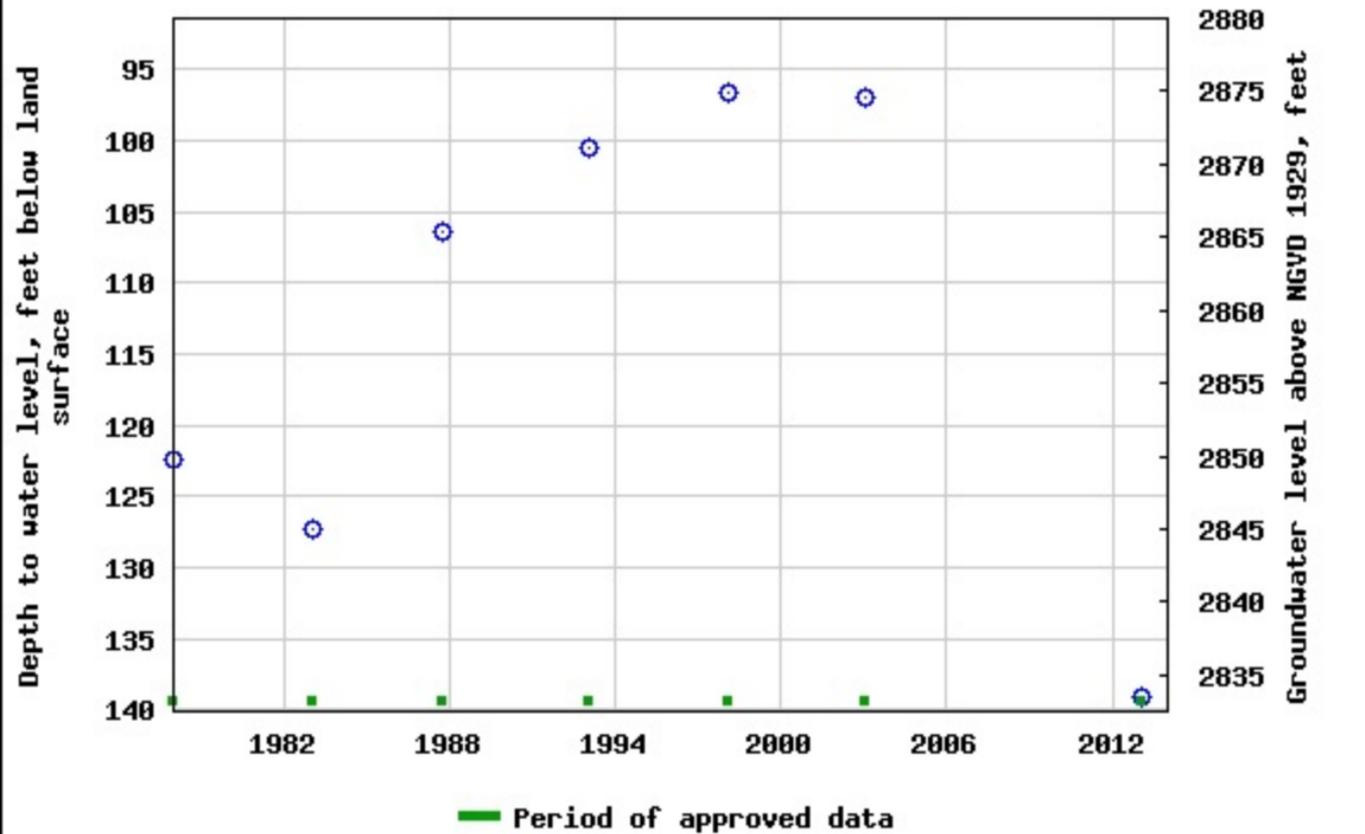
APPENDIX A

APPENDIX B

Graham Cracker 2 St. #001H



USGS 320309104020401 26S.28E.14.11111



APPENDIX C



August 15, 2019

SHELDON HITCHCOCK

COG OPERATING

P. O. BOX 1630

ARTESIA, NM 88210

RE: GRAHAM CRAKER 2-1

Enclosed are the results of analyses for samples received by the laboratory on 08/14/19 14:35.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-18-11. 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.

Celey D. Keene

Lab Director/Quality Manager

Analytical Results For:

 COG OPERATING
 SHELDON HITCHCOCK
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

 Received: 08/14/2019
 Reported: 08/15/2019
 Project Name: GRAHAM CRAKER 2-1
 Project Number: NONE GIVEN
 Project Location: EDDY CO NM

 Sampling Date: 08/14/2019
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: BTM - 1 (H902789-01)

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	08/15/2019	ND	1.97	98.5	2.00	6.96		
Toluene*	<0.050	0.050	08/15/2019	ND	2.13	107	2.00	9.43		
Ethylbenzene*	<0.050	0.050	08/15/2019	ND	2.02	101	2.00	6.61		
Total Xylenes*	<0.150	0.150	08/15/2019	ND	6.07	101	6.00	5.65		
Total BTEX	<0.300	0.300	08/15/2019	ND						

Surrogate: 4-Bromofluorobenzene (PID) 98.3 % 73.3-129

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	08/15/2019	ND	448	112	400	7.41		

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	08/15/2019	ND	215	108	200	2.88		
DRO >C10-C28*	<10.0	10.0	08/15/2019	ND	214	107	200	3.21		
EXT DRO >C28-C36	<10.0	10.0	08/15/2019	ND						

Surrogate: 1-Chlorooctane 94.4 % 41-142

Surrogate: 1-Chlorooctadecane 98.7 % 37.6-147

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

 COG OPERATING
 SHELDON HITCHCOCK
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

 Received: 08/14/2019
 Reported: 08/15/2019
 Project Name: GRAHAM CRAKER 2-1
 Project Number: NONE GIVEN
 Project Location: EDDY CO NM

 Sampling Date: 08/14/2019
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: BTTM - 2 (H902789-02)

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	08/15/2019	ND	1.97	98.5	2.00	6.96		
Toluene*	<0.050	0.050	08/15/2019	ND	2.13	107	2.00	9.43		
Ethylbenzene*	<0.050	0.050	08/15/2019	ND	2.02	101	2.00	6.61		
Total Xylenes*	<0.150	0.150	08/15/2019	ND	6.07	101	6.00	5.65		
Total BTEX	<0.300	0.300	08/15/2019	ND						

Surrogate: 4-Bromofluorobenzene (PID) 97.5 % 73.3-129

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	64.0	16.0	08/15/2019	ND	448	112	400	7.41		

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	08/15/2019	ND	215	108	200	2.88		
DRO >C10-C28*	<10.0	10.0	08/15/2019	ND	214	107	200	3.21		
EXT DRO >C28-C36	<10.0	10.0	08/15/2019	ND						

Surrogate: 1-Chlorooctane 95.9 % 41-142

Surrogate: 1-Chlorooctadecane 101 % 37.6-147

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*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

 COG OPERATING
 SHELDON HITCHCOCK
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

 Received: 08/14/2019
 Reported: 08/15/2019
 Project Name: GRAHAM CRAKER 2-1
 Project Number: NONE GIVEN
 Project Location: EDDY CO NM

 Sampling Date: 08/14/2019
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: N. SIDEWALL (H902789-03)

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	08/15/2019	ND	1.97	98.5	2.00	6.96	
Toluene*	<0.050	0.050	08/15/2019	ND	2.13	107	2.00	9.43	
Ethylbenzene*	<0.050	0.050	08/15/2019	ND	2.02	101	2.00	6.61	
Total Xylenes*	<0.150	0.150	08/15/2019	ND	6.07	101	6.00	5.65	
Total BTEX	<0.300	0.300	08/15/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 99.4 % 73.3-129

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	08/15/2019	ND	448	112	400	7.41	

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	08/15/2019	ND	215	108	200	2.88	
DRO >C10-C28*	<10.0	10.0	08/15/2019	ND	214	107	200	3.21	
EXT DRO >C28-C36	<10.0	10.0	08/15/2019	ND					

Surrogate: 1-Chlorooctane 83.3 % 41-142

Surrogate: 1-Chlorooctadecane 86.4 % 37.6-147

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*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

 COG OPERATING
 SHELDON HITCHCOCK
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

 Received: 08/14/2019
 Reported: 08/15/2019
 Project Name: GRAHAM CRAKER 2-1
 Project Number: NONE GIVEN
 Project Location: EDDY CO NM

 Sampling Date: 08/14/2019
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: S. SIDEWALL (H902789-04)

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	08/15/2019	ND	1.97	98.5	2.00	6.96		
Toluene*	<0.050	0.050	08/15/2019	ND	2.13	107	2.00	9.43		
Ethylbenzene*	<0.050	0.050	08/15/2019	ND	2.02	101	2.00	6.61		
Total Xylenes*	<0.150	0.150	08/15/2019	ND	6.07	101	6.00	5.65		
Total BTEX	<0.300	0.300	08/15/2019	ND						

Surrogate: 4-Bromofluorobenzene (PID) 97.4 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	64.0	16.0	08/15/2019	ND	448	112	400	7.41		

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	08/15/2019	ND	215	108	200	2.88		
DRO >C10-C28*	<10.0	10.0	08/15/2019	ND	214	107	200	3.21		
EXT DRO >C28-C36	<10.0	10.0	08/15/2019	ND						

Surrogate: 1-Chlorooctane 89.1 % 41-142

Surrogate: 1-Chlorooctadecane 92.7 % 37.6-147

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

 COG OPERATING
 SHELDON HITCHCOCK
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

 Received: 08/14/2019
 Reported: 08/15/2019
 Project Name: GRAHAM CRAKER 2-1
 Project Number: NONE GIVEN
 Project Location: EDDY CO NM

 Sampling Date: 08/14/2019
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: E. SIDEWALL (H902789-05)

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	08/15/2019	ND	1.97	98.5	2.00	6.96		
Toluene*	<0.050	0.050	08/15/2019	ND	2.13	107	2.00	9.43		
Ethylbenzene*	<0.050	0.050	08/15/2019	ND	2.02	101	2.00	6.61		
Total Xylenes*	<0.150	0.150	08/15/2019	ND	6.07	101	6.00	5.65		
Total BTEX	<0.300	0.300	08/15/2019	ND						

Surrogate: 4-Bromofluorobenzene (PID) 99.4 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	64.0	16.0	08/15/2019	ND	448	112	400	7.41		

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	08/15/2019	ND	215	108	200	2.88		
DRO >C10-C28*	<10.0	10.0	08/15/2019	ND	214	107	200	3.21		
EXT DRO >C28-C36	<10.0	10.0	08/15/2019	ND						

Surrogate: 1-Chlorooctane 83.1 % 41-142

Surrogate: 1-Chlorooctadecane 85.7 % 37.6-147

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

 COG OPERATING
 SHELDON HITCHCOCK
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

 Received: 08/14/2019
 Reported: 08/15/2019
 Project Name: GRAHAM CRAKER 2-1
 Project Number: NONE GIVEN
 Project Location: EDDY CO NM

 Sampling Date: 08/14/2019
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: W. SIDEWALL (H902789-06)

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	08/15/2019	ND	1.97	98.5	2.00	6.96	
Toluene*	<0.050	0.050	08/15/2019	ND	2.13	107	2.00	9.43	
Ethylbenzene*	<0.050	0.050	08/15/2019	ND	2.02	101	2.00	6.61	
Total Xylenes*	<0.150	0.150	08/15/2019	ND	6.07	101	6.00	5.65	
Total BTEX	<0.300	0.300	08/15/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 97.4 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	112	16.0	08/15/2019	ND	448	112	400	7.41	

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	08/15/2019	ND	215	108	200	2.88	
DRO >C10-C28*	<10.0	10.0	08/15/2019	ND	214	107	200	3.21	
EXT DRO >C28-C36	<10.0	10.0	08/15/2019	ND					

Surrogate: 1-Chlorooctane 93.8 % 41-142

Surrogate: 1-Chlorooctadecane 96.3 % 37.6-147

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

- QR-02 The RPD result exceeded the QC control limits; however, both percent recoveries were acceptable. Sample results for the QC batch were accepted based on percent recoveries and completeness of QC data.
- 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



Celey D. Keene, Lab Director/Quality Manager

APPENDIX D

W 240 W 270 300 NW 330 N 0

☉ 296°NW (T) ● 32°3.677', -104°3.988' ±16.4ft ▲ 2985ft



14 Aug 2019, 11:09:50



☉ 311°NW (T) ● 32°3.677', -104°3.988' ±16.4ft ▲ 2983ft



14 Aug 2019, 11:09:40