INITIAL C-141 AND REMEDIATION WORK PLAN

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occurred to the west of the location on an area of the pad that has been downsized as part of an interim reclamation. The spill area measured 20° x 75'. Standing fluid has been removed and any contaminated soil has been scraped off of the well pad location. A mist of oil was oversprayed into the pasture and the affected area has been sprayed with microblaze. Tetra Tech will sample the spill site area to delineate any possible contamination from the release and we will present a remediation work lant to the NMOCD / BLM 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 Finted Name: Josh Russo Title: HSE Coordinator Approval Date: 9 2.2 11 Expiration Date: 11 2.2 11 E-mail Address: jrusso@conchoresources.com Conditions of Approval: 508 PMT FINAL Attached □ Date: 05		· · · · · · · · · · · · · · · · · · ·	
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 Signature: Find Russo Printed Name: Josh Russo Title: HSE Coordinator Approval Date: 9 22 11 E-mail Address: jrusso@conchoresources.com Date: 05/05/2011 Phone: 432-212-2399	occurred to the west of the location on an area of the pad that has been Standing fluid has been removed and any contaminated soil has been and the affected area has been sprayed with microblaze. Tetra Tech w	downsized as part of an interim r scraped off of the well pad location ill sample the spill site area to del	eclamation. The spill area measured 20' x 75'. A mist of oil was oversprayed into the pasture ineate any possible contamination from the release
Signature: OIL CONSERVATION DIVISION Signature: Josh Russo FWV KNGHARER: Printed Name: Josh Russo FWV KNGHARER: Title: HSE Coordinator Approval Date: 9 22 11 Expiration Date: 11 22 11 E-mail Address: jrusso@conchoresources.com Conditions of Approval: 508 PAT FINAL Attached □ Date: 05/05/2011 Phone: 432-212-2399 C-141 & Y 11 2.2 11 Attached □	regulations all operators are required to report and/or file certain release public health or the environment. The acceptance of a C-141 report by should their operations have failed to adequately investigate and reme- or the environment. In addition, NMOCD acceptance of a C-141 report	se notifications and perform correct the NMOCD marked as "Final R diate contamination that pose a thr	ctive actions for releases which may endanger eport" does not relieve the operator of liability eat to ground water, surface water, human health
Printed Name: Josh Russo Approved by District Supervisor: Serff Element Title: HSE Coordinator Approval Date: 9 22 1 Expiration Date: 11 22 11 E-mail Address: jrusso@conchoresources.com Conditions of Approval: 508 Print FINAL Attached □ Date: 05/05/2011 Phone: 432-212-2399 C-141 BY 11 2.2 11 IRP-09-11-2742		OIL CON	SERVATION DIVISION
Printed Name: Josh Russo Approved by District Supervisor: Serff Element Title: HSE Coordinator Approval Date: 9 22 1 Expiration Date: 11 22 11 E-mail Address: jrusso@conchoresources.com Conditions of Approval: 508 Print FINAL Attached □ Date: 05/05/2011 Phone: 432-212-2399 C-141 BY 11 2.2 11 IRP-09-11-2742	Signature:	enter a National	
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E-mail Address: jrusso@conchoresources.com Conditions of Approval: SUBMIT FINAL Attached Date: 05/05/2011 Phone: 432-212-2399 C-141 BY 11/2-2-111. IRP-09-11-2742	Title: HSE Coordinator	Approval Date: 9 22111	Expiration Date: 11/22/11
Date: 05/05/2011 Phone: 432-212-2399 C-141 BY 11/2-2/11. 1RP-09-11-2742	E-mail Address inisso@conchorecourses.com	Conditions of Approvali	
Date: $03/03/2011$ Phone: $432-212-2399$	ב-זומוי רועטובנג. וועגגענעטעורטובגעעורעייבגעאוו		
Attach Additional Sheets It Necessary		G141 64 11221	11. 11RP-09-11-2742
	Attach Additional Sheets It Necessary		

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HOBBS OCD

Leking, Geoffrey R, EMNRD

SEP 2 2 2011

From:	Tavarez, lke [lke.Tavarez@tetratech.com]	RECEIVED
Sent:	Thursday, September 22, 2011 3:27 PM	
То:	Leking, Geoffrey R, EMNRD	
Cc:	'Joshua Russo'; 'Pat Ellis'; Grubbs, Robert	
Subject:	COG - Hercules Federal Com #1 - Chaves County - Work F	Plan Approval Request
Attachments:	COG - Hercules Federal - Work Plan .pdf	

Geoffrey,

Please find the enclosed Work Plan for the Hercules Federal Com #1 located in Chaves County, New Mexico. The work plan includes the soil assessment and recommendations for the remediation for the site. I will mail you a hard copy of the work plan for your files. Once approved, Tetra Tech will schedule the soil remediation and notify you prior to implementing the work plan. Please let me know if you need additional information or call me if you have any questions, thanks

Ike Tavarez, PG | Senior Project Manager

Main: 432.682.4559 | Fax 432 682 3946 | Cell: 432.425 3878

Ike.Tavarez@tetratech.com

Tetra Tech | Complex World. Clear Solutions™

1910 North Big Spring | Midland, TX 79705 | www.tetratech.com

PLEASE NOTE: This message, including any attachments, may include privileged, confidential and/or inside information. Any distribution or use of this communication by anyone other than the intended recipient is strictly prohibited and may be unlawful. If you are not the intended recipient, please notify the sender by replying to this message and then delete it from your system.

		S	TE INFOR	MATION	· · ·	HORREMAN
	· · · · · ·	Rep	ort Type:	Work Pla	n	
General Site Info	ormation:		e al an			SEP-2 2 2011
Site:	at design and a second s		ederal Com #1			
Company:		COG Opera	ting LLC			978 813 mile 548 8 874 mile
Section, Townsh	nip and Range	Unit E	Sec 15	T15S	R31E	RECEIVED
Lease Number:		API-30-005-	27999			
County:		Chaves Cou	untý			· · · · · · · · · · · · · · · · · · ·
GPS:	,		33.01765° N			103.81779° W
Surface Owner:		Federal	•		· ·	
Mineral Owner:						
Directions:		From the inte	rsection of Hwy 8	82 and Co Rd 24	49 travel nor	th on Co Rd 249 for 11 miles, turn left
			on Co Rd 249 fo	r 0.9 miles, turn	right onto M	feldin Ranch Road and travel for 0.1.
	,,,,,,	miles to site.				
·	•				· ·	
	<u>. </u>		•	·		
Rélease Data:						
Date Released:	·	5/2/2011	· · · · · ·	-	•	
Type Release:		Produced FI	uid .			
Source of Contan	nination:	Flowline	. •			
Fluid Released:	•	30 bbls				
Fluids Recovered	:	25 bbls				
Official Commun	nication:	and a second second second				
Name:	Pat Ellis			CONTRACTOR OF THE CONTRACT CONTRACT	Ike Tavare	7
		<u> </u>	1		<u> </u>	
Company:	COG Operating, LL		<u> </u>		Tetra Tech	· · · · · · · · · · · · · · · · · · ·
Address:	550 W. Texas Ave.	Ste. 1300	·		1910 N. Bi	g Spring
P.O. Box						· · · · · · · · · · · · · · · · · · ·
City:	Midland Texas, 797	701	·		Midland, To	exas
Phone number:	(432) 686-3023			· .	(432) 425-:	3878
Fax:	(432) 684-7137				,	
Email:	pellis@conchoreso	urces com		· · · · · · · · · · · · · · · · · · ·	ike tavare	z@tetratech.com
	Iponio o contricicio	arocoloom			INO. LO VUIC	2.8.16.114.16.011.100111
Ranking Criteria	and the second	N. 18 14.24.24				
indimining Official		and the forest states and the second states and	alatik i na sila sila di sebeli s			and the second
Depth to Groundw	ater:		Ranking Scor	e		Site Data
<50 ft			20			
50-99 ft			10		· · ·	
>100 ft.			0			0
	-	-				
WellHead Protection		• • •	Ranking Scor	e		Site Data
	00 ft., Private <200 f		20		<u> </u>	
Water Source >1,0	00 ft., Private >200 f	t	0		•	0
					· · · · · · · · · · · · · · · · · · ·	
Surface Body of W	/ater:		Ranking Scon			Site Data
<200 ft. 200 ft - 1,000 ft.	<u> </u>		20 10	·		
>1,000 ft.	····				·	0
21,000 h.						
	al Ranking Score:	R	1200 - PEA ON			a soll in 5 Ha martil Down
State Carter State (NO	ai nanking Score.	STR. TUNK	0		. :	approved would concernance
		A DETEN		in the second		approved with conditions
•			ble Soil RRAL			MOCD-DIST 1
		Benzene	Total BTE			123111
•	•	10	50	5,000		
·		•				



September 12, 2011

Mr. Geoffrey Leking Environmental Engineer Oil Conservation Division, District 1 1625 North French Drive Hobbs, New Mexico 88240

Re: Work Plan for the COG Operating LLC., Hercules Federal Com #1, Unit E, Section 15, Township 15 South, Range 31 East, Chaves County, New Mexico.

Mr. Leking:

Tetra Tech, Inc. (Tetra Tech) was contacted by COG Operating LLC. (COG) to assess a spill from the Hercules Federal Com #1 located in Unit E, Section 15, Township 15 South, Range 31 East, Chaves County, New Mexico (Site). The spill site coordinates are N 33.01765°, W 103.81779°. 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 May 1, 2011, and released approximately thirty (30) barrels of produced fluid from a flow line. Twenty Five (25) barrels of standing fluids were recovered. The spill initiated west of the pad affecting an area measuring 160' x (5' to 40' wide). In addition, there was also an area of light overspray measuring approximately 80' x 145'. The initial C-141 is enclosed in Appendix A.

Groundwater

No water wells were listed within Section 15. According to the NMOCD groundwater map, the average depth to groundwater in this area is greater than 200' below surface.



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 May 24, 2011, Tetra Tech personnel inspected and sampled the spill area. Four (4) auger holes (AH-1 and AH-4) were 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 B. The results of the sampling are summarized in Table 1. The auger hole locations are shown on Figure 3.

Referring to Table 1, all of the samples were below the TPH and BTEX RRAL, with the exception of AH-4. Auger hole (AH-4) showed a TPH of 9,585 mg/kg at 0-0.5' and not vertically defined, due to the dense formation. AH-1, AH-3 and AH-4 showed chloride concentrations of 1,600 mg/kg (0-0.5'), 2,120 mg/kg (0-1') and 1,670 mg/kg (0-0.5'), respectively. AH-1 did show a significant decline to <200 mg/kg at 1-1.5', but the remaining auger holes were not vertically defined.

Work Plan

COG proposes to remove impacted material as highlighted (green) in Table 1. The areas of AH-1, AH-3 and AH-4 will be excavated to a depth of approximately 1.0' to 2.0' below surface. Once excavated, backhoe trenches will be installed in the areas of AH-3 and AH-4 to evaluate the excavation bottom and further define the chloride impact, if necessary. In addition, a confirmation sample for TPH will be collected from the area of AH-4. Once excavated to the appropriate depths, the excavations will be backfilled with clean soil.



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,

TETRA TECH Ike Tavarez /PG

Project Manager

cc: Pat Ellis - COG

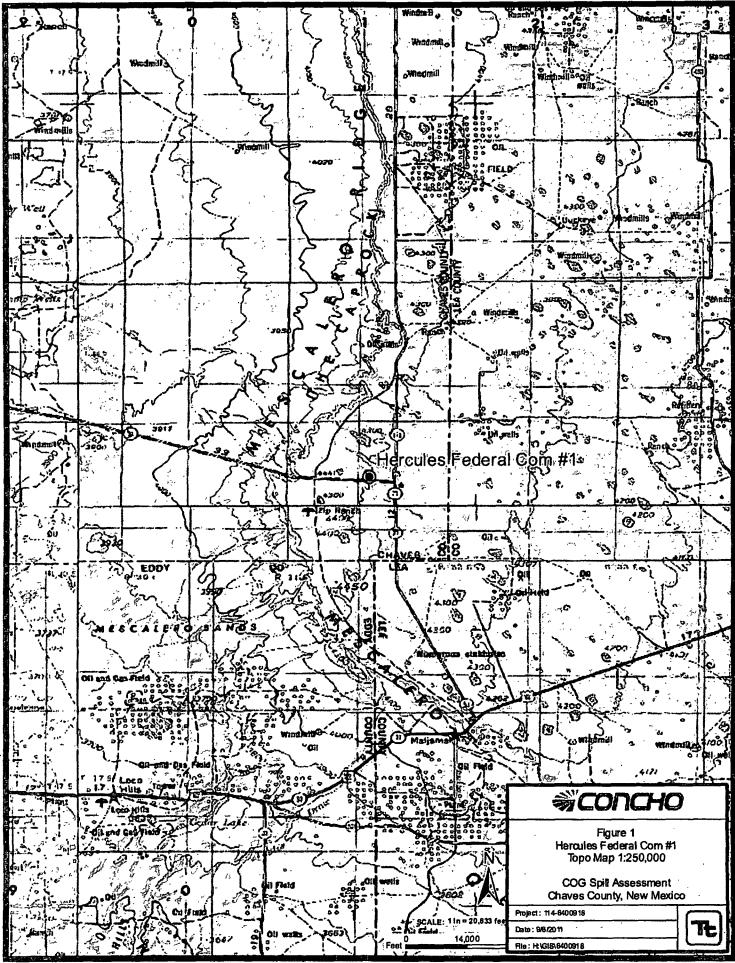
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Figures

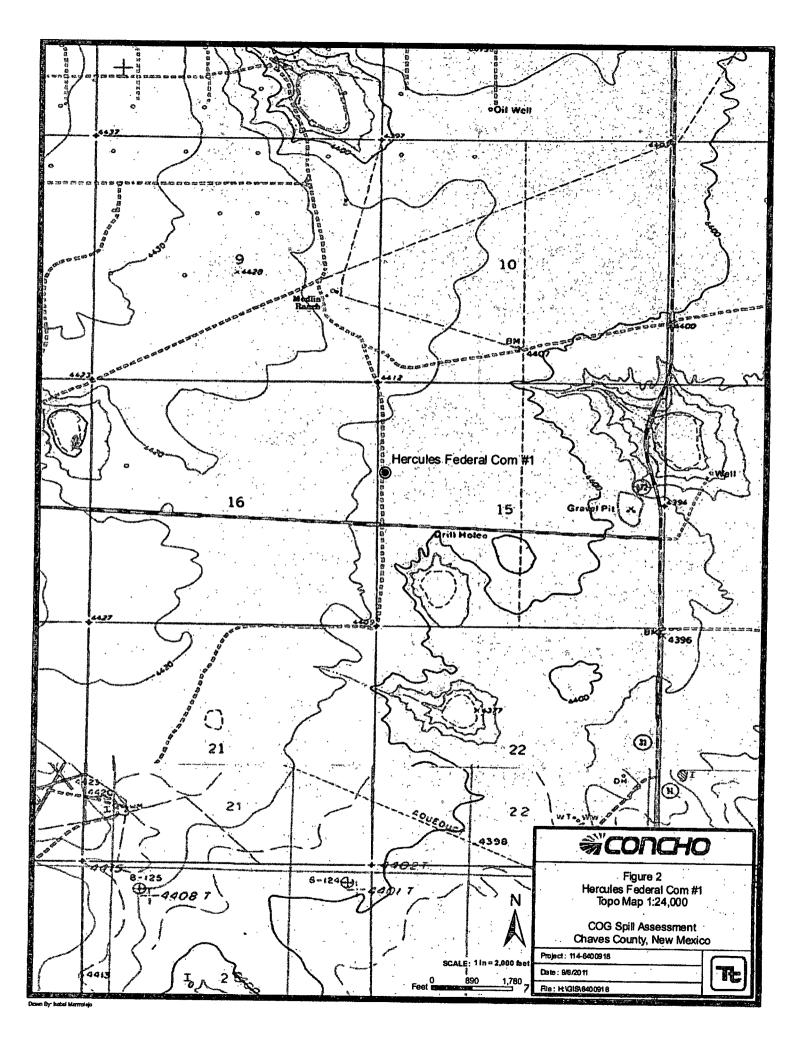
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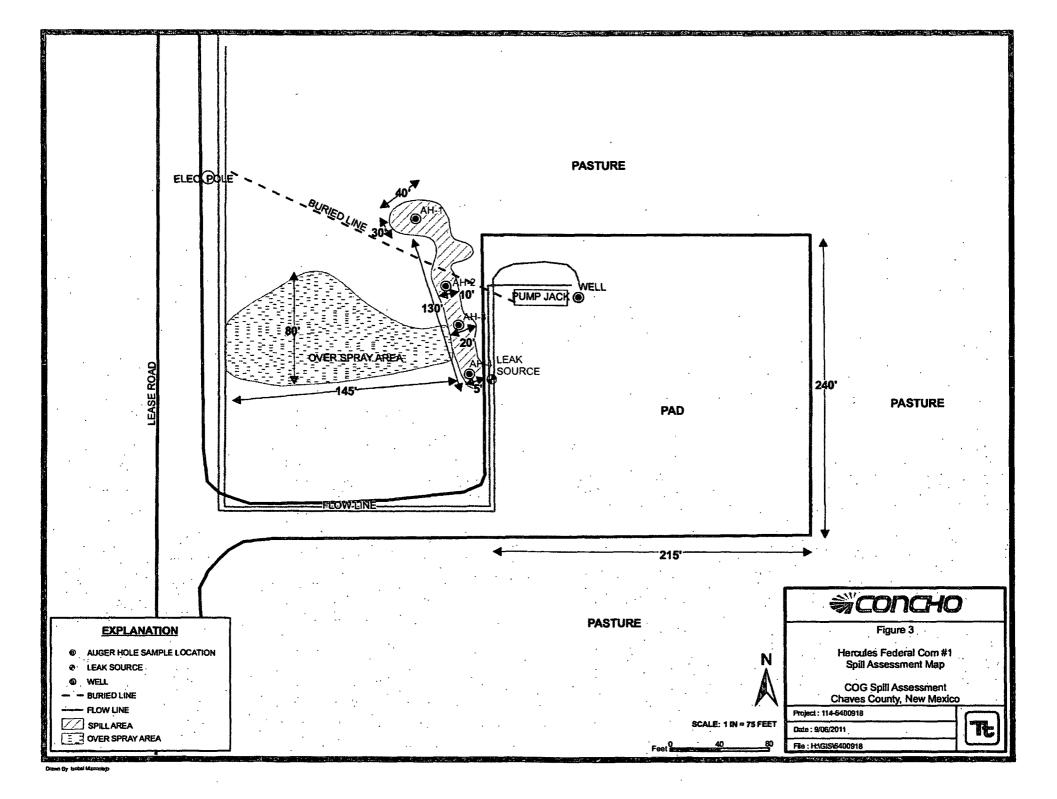
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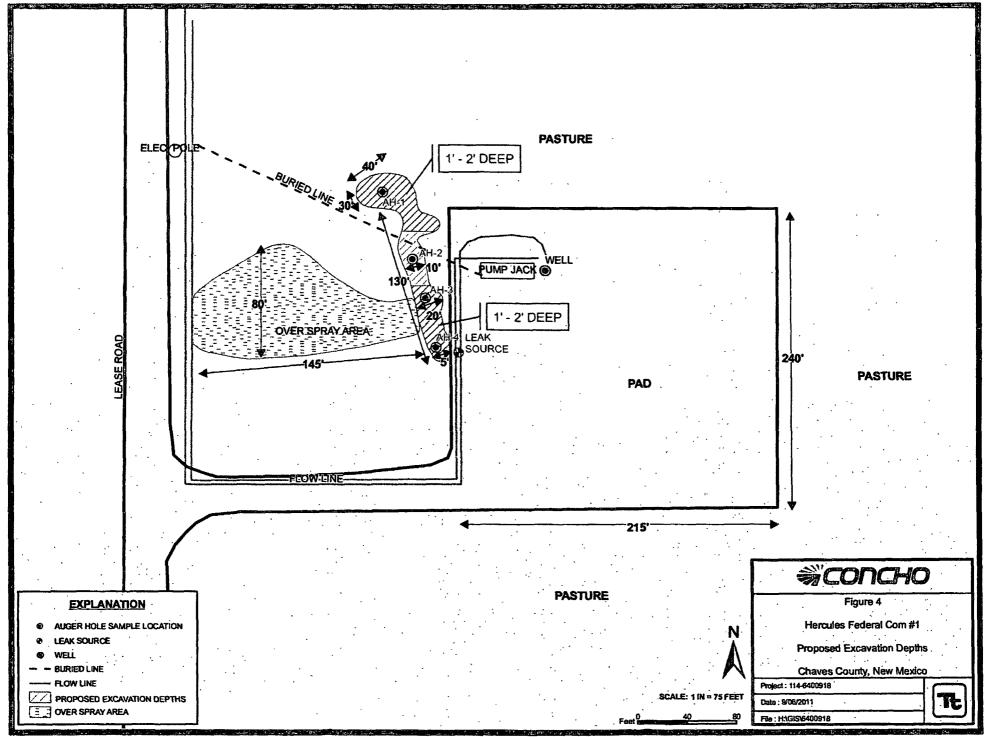
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Dawn By Sabel Mannel ejo







Occurs By: testes Marcanini

Tables

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Table 1 COG Operating LLC. HERCULES FEDERAL COM. #1 Chavez County, New Mexico

Sample	0	Sample	Soil	Status	Т	PH (mg/k	(g)	Benzene	Toluene	Ethlybenzene	Xylene	Total	Chloride
ID	Sample Date	Depth (ft)	In-Situ	Removed	GRO	DRO	Total	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	BTEX	(mg/kg)
AH-1	5/24/2011	0-1'	X		474.	3,400	3,874	<0.200	<0.200	0.771	2.96	3.73	1,600
	U	1-1.5'	х		49.7	148	197.7	<0.0200	<0.0200	<0.0200	0.318	0.318	<200
AH-2	5/24/2011	0-1'	x		297	2,310	2,607	<0.100	<0.100	0.413	2.96	3.373	626
AH-3	5/24/2011	0-1'	x		394 :	3,600	3,994	<0.100	0.602	0.619	6.53	7.15	2,120
AH-4	5/24/2011	0-0.5'	x	· .	775	8,810	9,585	1,04	13:2	19.5	16.8	36.30	1,670
(-)	Not Analyzed										انجار في من من من الي		

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Proposed Excavated Depths

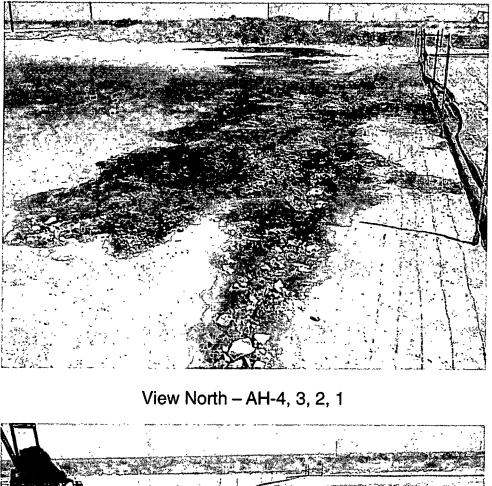
Photos

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COG Operating LLC Hercules Federal Com #1 Chaves County, New Mexico







View South – AH-1, 2, 3, 4

Appendix A

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State of New Mexico Energy Minerals and Natural Resources

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505

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Form C-141 Revised October 10, 2003

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

Release Notification and Corrective Action

Initial Report 🛛 Final Report	\boxtimes	OPERATOR		
	Pat Ellis	Contact	mpany COG OPERATING LLC	Name of Com
	432-230-0077	Telephone No.	550 W. Texas, Suite 100, Midland, TX 79701	Address
	Flowline	Facility Type	Hercules Federal Com #1	Facility Name
	Flowline	Facility Type	Hercules Federal Com #1	Facility Name

Surface Owner	Federal	Mineral Owner	Lease No. (API#) 30-005-27999

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
C	15	155	31E					Chaves

Latitude 33 01.018 Longitude 103 49.058

NATURE OF RELEASE

Type of Release Produced fluid	Volume of Release 30bbls	Volume Re	ecovered 25bbls
Source of Release Flowline	Date and Hour of Occurrence 05/01/2011	Date and H 05:01/2011	lour of Discovery 8:00 a.m.
Was Immediate Notice Given?	If YES, To Whom?		
Yes 🗋 No 🗋 Not Required	Geoffr	ey Leking-O	CD
By Whom? Josh Russo	Date and Hour 05/02/2011	10:45 a.m.	
Was a Watercourse Reached?	If YES, Volume Impacting the Wa	atercourse.	
🗌 Yes 🖄 No			
If a Watercourse was impacted, Describe Fully.*	<u> </u>		
Describe Cause of Problem and Remedial Action Taken.*			
Due to high pressure, the poly flowline ruptured at the Hercules Federal into service.	Com #1 location. The poly flowline h	uas been fused	back together and returned
Describe Area Affected and Cleanup Action Taken.*			
Initially 30bbls of produced fluid was released from the ruptured poly flo occurred to the west of the location on an area of the pad that has been do			
Standing fluid has been removed and any contaminated soil has been ac			
and the affected area has been sprayed with microblaze. Tetra Tech will			
and we will present a remediation work plan to the NMOCD / BLM for a			
I hereby certify that the information given above is true and complete to t			
regulations all operators are required to report and/or file certain release a public health or the environment. The acceptance of a C-141 report by the public health or the environment.			
should their operations have failed to adequately investigate and remedia			
or the environment. In addition, NMOCD acceptance of a C-141 report of			
federal, state, or local laws and/or regulations.	-	-	
	OIL CONSER	<u>VATION I</u>	DIVISION
Signature:			
Signature.			
Printed Name: Josh Russo	Approved by District Supervisor:		
Title: HSE Coordinator	Approval Date:	Expiration D	ate:
E-mail Address: jrusso@conchoresources.com	Conditions of Approval:		
e man realisa. ji nasongconenticasourcea.com	Constitutions of Apploval.		Attached
Date: 05/05/2011 Phone: 432-212-2399			

* Attach Additional Sheets If Necessary

Appendix B

Page Number: 1 of 2

Summary Report

Ike Tavarez Tetra Tech 1910 N. Big Spring Street Midland, TX 79705

Report Date: June 14, 2011

Work Order: 11052704

Project Location:Chavez Co., NMProject Name:COG/Hercules Fed. Com. #1Project Number:114-6400918

			Date	Time	Date
Sample	Description	Matrix	Taken	Taken	Received
267518	AH-1 0-1'	soil	2011-05-24	00:00	2011-05-26
267519	AH-1 1-1.5'	soil	2011-05-24	00:00	2011-05-26
267520	AH-2 0-1'	soil	2011-05-24	00:00	2011-05-26
267521	AH-3 0-1'	soil	2011-05-24	00:00	2011-05-26
267522	AH-4 0-0.5'	soil	2011-05-24	00:00	2011-05-26

T		Ì	BTEX	1	TPH DRO - NEW	TPH GRO
	Benzene	Toluene	Ethylbenzene	Xylene	DRO	GRO
Sample - Field Code	(mg/Kg)	(ing/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)
267518 - AH-1 0-1'	< 0.200	< 0.200	0.771	2.96	3400 q.	474
267519 - AH-1 1-1.5'	< 0.0200	<0.0200	<0.0200	0.318	148	49.7
267520 - AH-2 0-1'	< 0.100	<0.100	0.413	2.96	2310 q.	` 297
267521 - AH-3 0-1'	<0.100	0.602	0.619	6.53	3600 q.	394
267522 - AH-4 0-0.5'	1.04	13.2	19.5	16.8	8810 q.	775

Sample: 267518 - AH-1 0-1'

Param	Flag	Result	Units	RL
Chloride		1600	mg/Kg	4

Sample: 267519 - AH-1 1-1.5'

Param	Flag	Result	Units	RL
Chloride		<200	mg/Kg	4

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.