

**STATE OF NEW MEXICO
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES
OIL CONSERVATION DIVISION**

OCT 16 2018 PM04:06

**APPLICATION OF COG OPERATING LLC
FOR APPROVAL OF A REMEDIATION PLAN,
LEA COUNTY, NEW MEXICO.**

CASE NO. 20069

APPLICATION

COG Operating LLC ("COG"), through its undersigned attorneys, files this application with the Oil Conservation Division pursuant to the provisions of NMAC 19.15.29.12.C(5) for an order approving COG's remediation plan for a 6 bbl produced water release from a flowline located in the SW/4 SW/4 (Unit M) of Section 17, Township 19 South, Range 32 East, NMPM, Lea County, New Mexico. In support of its application, COG states:

1. COG Operating LLC (OGRID No. 229137) is the operator of the Lusk Deep Unit A #019 SWD (API No. 30-025-35244) located on federal lands in the SE/4 SW/4 (Unit N) of Section 17.
2. On June 14, 2018, a leak was discovered in a flowline connected to the Lusk Deep Unit A #019 SWD in the SW/4 SW/4 (Unit M) of Section 17. The flowline was repaired and a vacuum truck dispatched to remove all freestanding fluids. A Form C-141 was filed with Division the following day which reflects that 3 bbls of the 6 bbls of produced water released was recovered by a vacuum truck. The Division's district office assigned Case No. 1RP-5098 to this matter.
3. On September 5, 2018, COG filed a delineation workplan and remediation proposal with the Division's district office. The workplan included, among other requirements, excavation at a depth of 2.5 feet at a location on the western edge of the release area (SP1) and excavation at

a depth of 4 feet at two locations in the center and eastern portion of the release area (SP2 and SP3). *See Attached plat.*

4. On October 1, 2018, the Division's district office responded to COG's workplan with an email stating it will approve the plan but only on the condition that the sites in the center and eastern portion of the release area (SP2 and SP3) are excavated to 9 feet rather than the proposed 4 feet. The district office offered no written explanation for this additional excavation requirement.

5. COG's proposed workplan has been approved by the BLM and is appropriate to address the 3 bbls of produced water that was not immediately recovered by a vacuum truck. The district office's proposed additional excavation is unwarranted and unnecessary to address the minimal impacts of this small release.

WHEREFORE, COG requests that this application be set for hearing before an Examiner of the Oil Conservation Division on November 15, 2018, and, after notice and hearing as required by law, the Division enter an order approving COG's proposed workplan.

Respectfully submitted,

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ATTORNEYS FOR COG OPERATING LLC

CASE 20069:

Application of COG Operating LLC for approval of a remediation plan, Lea County, New Mexico. Applicant in the above-styled cause seeks an order approving its proposed remediation plan for a 6 bbl produced water release from a flowline located in the SW/4 SW/4 (Unit M) of Section 17, Township 19 South, Range 32 East, NMPM, Lea County, New Mexico. The release area is located near the Lusk Deep Unit A #019 SWD (API No. 30-025-35244) and approximately 31 miles West of Monument, New Mexico.

COG, Lusk Deep Unit A #019 SWD

Leak date: 06/14/2018
Lea County, NM
API# 30-025-35244
1RP-5098

Legend

- 2.5 ft Excavation
- 4 ft Excavation with a liner
- Leak area
- Sample points

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Google Earth

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60 ft