



February 17, 2015

Oil Conservation Division
District 2 – Artesia
811 S. First St.
Artesia, NM 88210

Conditions for approval: remove
2feet BGS.

Re: Prohibition Federal Unit #1
30-025-31137
Sec. 12, T22S-R32E
Lea County, NM

Dr. Oberding,

COG Operating LLC would like to submit for your consideration the enclosed work plan for the above captioned well. The plan is in response to the C-141 Initial report dated December 2, 2014.

Background

The release was caused by a corroded steel flow line with 18 barrels of produced water released and 9 barrels of produced water recovered. The release impacted the pasture on the south side of the location and the adjacent lease road. The approximate dimensions of the impacted area measure 1-17' in width by 200' in length.

Groundwater

Based on the Chevron Trend Maps, the release area would be classified at a site ranking of Zero with depth to groundwater at greater than 350'.

Soil Assessment and Analytical Results

Two sample points (S1 & S2) were selected within the pasture of the release area. Samples were taken at depths of 1', 2', 3', and 4' for S1 and down to 10' for S2 labeled on the attached Site Diagram. The Site Diagram includes a Sample Summary Table and an outline of the release.

Sample Results show elevated chloride levels to a depth of 2' for S1 and to a depth of 4' for S2. A copy of the Analytical Results is attached for your consideration.

Work Plan

COG Operating LLC proposes the excavation of S1 to a depth of approximately 2.5' (~550 ft²) and excavation of S2 to a depth of 5' (~1560 ft²). Excavated areas will be backfilled with like material and reseeded with a BLM approved seed mixture in June 2015. The lease road would be scraped and new caliche would be added to the scraped areas followed by fresh water for compaction.

S1	Cl-
1'	15100
2'	11200
3'	400
4'	80
S2	Cl-
1'	13500
2'	12800
3'	11600
4'	7460
6'	ND
8'	64
10'	144

If there are no objections or further stipulations, COG Operating LLC would like to begin the remediation process based on approval of this work plan. Please feel free to contact me with any questions or concerns at (575) 748-6933.

Sincerely,



Lupe Carrasco
Environmental Coordinator

Enclosure(s): Site Diagram
Analytical Results
C-141 Initial (Copy)

Prohibition Federal Unit #1

Prohibition Federal Unit #1

Section 12, T22S-R32E
Released: 18 B/PW
Recovered: 9 B/PW

32.40801
-103.63508

S1	Cl-
1'	15100
2'	11200
3'	400
4'	80
S2	Cl-
1'	13500
2'	12800
3'	11600
4'	7460
6'	ND
8'	64
10'	144

Legend

▲ Release Area



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

December 17, 2014

GARRETT MERKET

COG OPERATING

P. O. BOX 1630

ARTESIA, NM 88210

RE: PROHIBITION

Enclosed are the results of analyses for samples received by the laboratory on 12/12/14 15:30.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. 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,

Celey D. Keene

Lab Director/Quality Manager

Analytical Results For:

 COG OPERATING
 GARRETT MERKET
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

 Received: 12/12/2014
 Reported: 12/17/2014
 Project Name: PROHIBITION
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

 Sampling Date: 12/12/2014
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Jodi Henson

Sample ID: S 1 - 1' (H403806-01)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	15100	16.0	12/16/2014	ND	400	100	400	0.00	

Sample ID: S 1 - 2' (H403806-02)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	11200	16.0	12/16/2014	ND	400	100	400	0.00	

Sample ID: S 1 - 3' (H403806-03)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	400	16.0	12/16/2014	ND	400	100	400	0.00	

Sample ID: S 1 - 4' (H403806-04)

Chloride, SM4500Cl-B			mg/kg		Analyzed By: AP				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	12/16/2014	ND	400	100	400	0.00	

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

COG OPERATING
GARRETT MERKET
P. O. BOX 1630
ARTESIA NM, 88210
Fax To: NONE

Received: 12/12/2014
Reported: 12/17/2014
Project Name: PROHIBITION
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 12/12/2014
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: S 2 - 1' (H403806-05)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	13500	16.0	12/16/2014	ND	400	100	400	0.00	

Sample ID: S 2 - 2' (H403806-06)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	12800	16.0	12/16/2014	ND	400	100	400	0.00	

Sample ID: S 2 - 3' (H403806-07)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	11600	16.0	12/16/2014	ND	400	100	400	0.00	

Sample ID: S 2 - 4' (H403806-08)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	7460	16.0	12/16/2014	ND	400	100	400	0.00	

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*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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

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* = Accredited Analyte

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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

BILL TO

ANALYSIS REQUEST

Company Name: Loake Resources

Project Manager: James H. Meeker

Address: 2208 W. Main

City: Albany

Phone #: 575-248-6940 Fax #: 575-248-6940

Project #:

Project Name: Prohibition

Project Location:

Sampler Name: James H. Meeker

FOR LAB USE ONLY

Lab I.D. Sample I.D.

HUO3206

1 51-1'
2 51-2'
3 51-3'
4 51-4'
5 52-1'
6 52-2'
7 52-3'
8 52-4'

(G)RAB OR (C)OMP

CONTAINERS

GROUNDWATER

WASTEWATER

SOIL

OIL

SLUDGE

OTHER

ACID/BASE

ICE / COOL

OTHER

DATE

TIME

Chlorides

12-12-14 3:30

12-12-14 3:30

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12-12-14 3:30

Relinquished By: James H. Meeker

Date: 12-12-14

Received By: James H. Meeker

Relinquished By: James H. Meeker

Date: 12-12-14

Received By: James H. Meeker

Delivered By: (Circle One)

Sampler - UPS - Bus - Other: 5.22

Sample Condition

Cool ☒ Intact ☒

CHECKED BY: James H. Meeker

(Initials)

Phone Result: ☐ Yes ☐ No

Fax Result: ☐ Yes ☐ No

REMARKS:

Add'l Phone #:

Add'l Fax #:

* Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326

#54



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

December 23, 2014

GARRETT MERKET

COG OPERATING

P. O. BOX 1630

ARTESIA, NM 88210

RE: PROHIBITION

Enclosed are the results of analyses for samples received by the laboratory on 12/18/14 16:10.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. 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.

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Sincerely,

Celey D. Keene

Lab Director/Quality Manager

Analytical Results For:COG OPERATING
GARRETT MERKET
P. O. BOX 1630
ARTESIA NM, 88210
Fax To: NONEReceived: 12/18/2014
Reported: 12/23/2014
Project Name: PROHIBITION
Project Number: NONE GIVEN
Project Location: NOT GIVENSampling Date: 12/12/2014
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Kathy Perez**Sample ID: S 2 - 6' (H403875-01)**

Chloride, SM4500Cl-B

mg/kg

Analyzed By: AP

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	12/19/2014	ND	400	100	400	0.00	

Sample ID: S 2 - 8' (H403875-02)

Chloride, SM4500Cl-B

mg/kg

Analyzed By: AP

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	12/19/2014	ND	400	100	400	0.00	

Sample ID: S 2 - 10' (H403875-03)

Chloride, SM4500Cl-B

mg/kg

Analyzed By: AP

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	144	16.0	12/19/2014	ND	400	100	400	0.00	

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Celey D. Keene, Lab Director/Quality Manager

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	Samples reported on an as received basis (wet) unless otherwise noted on report

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Celey D. Keene, Lab Director/Quality Manager



BILL TO

ANALYSIS REQUEST

#24 + Cardinal cannot accept verbal changes. Please fax written changes to 575-393-2476

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 August 8, 2011

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: Prohibition Federal Unit #1	Facility Type: Battery	
Surface Owner: Federal	Mineral Owner: Federal	API No. 30-025-31137

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
E	12	22S	32E	1980'	North	660'	West	Lea

Latitude 32 4081088116745 Longitude -103 634870651304

NATURE OF RELEASE

Type of Release: Water	Volume of Release: 18 bbls	Volume Recovered: 9 bbls
Source of Release: Steel flowline	Date and Hour of Occurrence: 11/18/2014 1:57 pm	Date and Hour of Discovery: 11/18/2014 1:57 pm
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 was caused by corrosion in a steel flowline. The leak was isolated and vacuum trucks were dispatched to recover any standing fluid. All fluid was disposed of at an NMOCD approved facility.

Describe Area Affected and Cleanup Action Taken.*

The impacted area is located in the pasture. And is approximately 200' x 17' in size. Concho will have the spill site sampled to delineate any possible contamination from the release and we will present a remediation work plan to the NMOCD 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		
Printed Name: Amanda Trujillo	Approved by Environmental Specialist:		
Title: Senior Environmental Coordinator	Approval Date:	Expiration Date:	
E-mail Address: atrujillo@concho.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: December 2, 2014	Phone: 575-748-6940		

* Attach Additional Sheets If Necessary