



**Amanda Trujillo**  
Senior Environmental Coordinator

March 18, 2015

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

Mr. Bratcher,

This letter is in response to the C-141 Initial report dated October 24, 2014 for the BKU Central Tank Battery SWD. This release was caused by a plunger on a triplex pump failing and causing the release of 45 bbls of produced water. The impacted area was confined to the bermed area of the facility. This area is classified as a site ranking of zero with depth to groundwater at 175' to 200' depth per the Chevron Trend Maps (2003).

Prior to sampling a daylighting crew was called in to spot lines and a trench was excavated by means of a hydrovac truck. The trench revealed 24 buried lines. These lines run throughout the facility. At this time COG Operating LLC would like to request closure based on safety concerns for those excavating. Cleanup to meet NMOCD RRALs for a site ranking of zero can be addressed at the time of abandonment. If you have any additional questions or would like to discuss this further, Please feel free to contact me at 575-748-6930.

Sincerely,

A handwritten signature in blue ink that reads "A. Trujillo".

Amanda Trujillo

Enclosed

- (1) Site Diagram
- (2) C-141 Final
- (3) C-141 Initial Copy

March 16, 2015

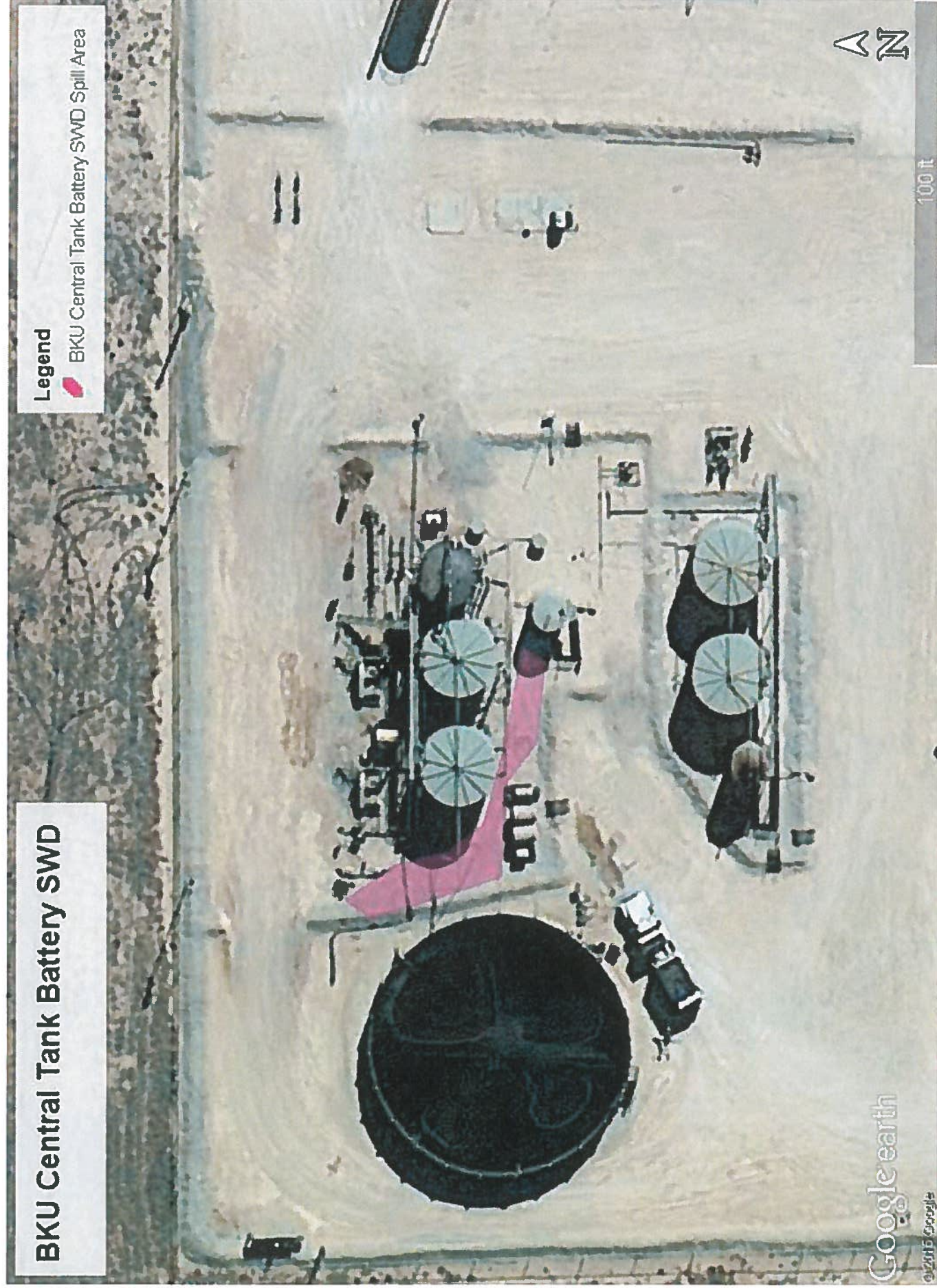
# BKU Central Tank Battery SWD

BKU Central Tank Battery SWD

Legend



BKU Central Tank Battery SWD Spill Area





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: BKU Central Tank Battery SWD	Facility Type: Facility

Surface Owner: Fee	Mineral Owner: Fee	API No. N/A
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### LOCATION OF RELEASE

Unit Letter J	Section 24	Township 17S	Range 29E	Feet from the N/A	North/South Line N/A	Feet from the N/A	East/West Line N/A	County Eddy
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Latitude N32' 49.180 Longitude W104' 01.569

### NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: 45 bbls PW	Volume Recovered: 40 bbls PW
Source of Release: Pump failure	Date and Hour of Occurrence: 10-10-2014 12:00 pm	Date and Hour of Discovery: 10-10-2014 12:00 pm
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Mike Bratcher – OCD	
By Whom? Amanda Trujillo	Date and Hour: 10-16-2014 8:01 pm	
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.\*

The release was caused by a plunger on a triplex pump failing. Vacuum trucks were dispatched to remove any standing fluids and the pump was replaced.

Describe Area Affected and Cleanup Action Taken.\*

Prior to sampling a daylighting crew was called into spot lines and a trench was excavated by means of a hydrovac truck. The trench revealed 24 buried lines. These lines run throughout the facility. At this time COG Operating LLC would like to request closure based on safety concerns for those excavating. Cleanup to meet NMOCD RRALs for a site ranking of zero can be addressed at the time of abandonment.

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: 	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Amanda Trujillo	Approved by Environmental Specialist:	
Title: Senior Environmental Coordinator	Approval Date:	Expiration Date:
E-mail Address: <a href="mailto:atrujillo@concho.com">atrujillo@concho.com</a>	Conditions of Approval:	Attached <input type="checkbox"/>
Date: March 16, 2015 Phone: 575-748-6940		

\* Attach Additional Sheets If Necessary

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Surface Owner: Fee	Mineral Owner: Fee	API No. N/A
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### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
J	24	17S	29E	N/A	N/A	N/A	N/A	Eddy

Latitude N32° 49.180 Longitude W104° 01.569

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By Whom? Amanda Trujillo	Date and Hour: 10-16-2014 8:01 pm	
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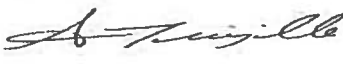
Describe Cause of Problem and Remedial Action Taken.\*

The release was caused by a plunger on a triplex pump failing. Vacuum trucks were dispatched to remove any standing fluids and the pump was replaced.

Describe Area Affected and Cleanup Action Taken.\*

The impacted area was within the bermed facility in an area approximately 10'x30'. 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: 	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Amanda Trujillo	Approved by Environmental Specialist:	
Title: Senior Environmental Coordinator	Approval Date:	Expiration Date:
E-mail Address: <a href="mailto:atrujillo@concho.com">atrujillo@concho.com</a>	Conditions of Approval:	Attached <input type="checkbox"/>
Date: October 24, 2014 Phone: 575-748-6940		

\* Attach Additional Sheets If Necessary