



November 5, 2014

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

Re: Northwest Central Tank Battery
Lease No. NMNM-86025
Sec. 17, T17S-R30E
Eddy County, NM

Mr. Mike Bratcher,

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 August 29, 2014.

Background

The release was caused by a corroded 4" nipple on a collar attached to the tank releasing approximately 2 barrels of oil and 950 barrels of produced water of which 1 barrel of oil and 900 barrels of produced water were recovered. All fluid was contained within the bermed facility. The tank fitting was repaired and an initial scrape of 2-4" was done with all impacted material hauled to an approved NMOCD facility for disposal.

Groundwater

Based on the Chevron Trend Maps, the release area would be classified at a site ranking of Zero due to the depth of groundwater at greater than 250'. No well information could be found for Section 17 per NMOSE.

Soil Assessment and Analytical Results

Soil assessment results were not obtained due to the associated hazards consisting of produced water lines, electrical conduits, and production equipment on the North, West, and South side of the tank. The South and East side of the release area occurred over a portion that was previously capped with a 3.5' of clay material (see attached diagram). At the risk of not compromising the existing cap, no soil bores were installed through the lined section.

Work Plan

COG Operating LLC proposes no further excavation of the release area due to the clay material in place and the associated safety hazards involved with excavation and sampling. As approved in a previous work plan submitted to the NMOCD (May 2014), any future mitigation of releases will be handled at time of abandonment of the facility.

If there are no objections or further stipulations, COG Operating LLC would like to request closure of the site based on approval of this work plan. Please feel free to contact me with any questions or concerns at (575) 725-0787.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lupe Carrasco".

Lupe Carrasco
Environmental Scientist

Enclosed

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

November 4, 2014

Northwest Central Tank Battery

Sec. 17, T17S-30E

Released: 2 B/O, 950 B/PW
Recovered: 1 B/O, 900 B/PW

Legend

 Release Area-NWTB

 3 1/2 Clay Liner

 Transmission Lines

Google earth

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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: Northwest Central Tank Battery	Facility Type: Tank Battery	
Surface Owner: Federal	Mineral Owner:	Lease No. NMNM-86025

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
N	17	17S	30E	990	South	2310	West	Eddy

Latitude 32.49.813 Longitude 103 59.725

NATURE OF RELEASE

Type of Release: Oil and Produced Water	Volume of Release: Oil: 2 bbls ; PW: 950 bbls	Volume Recovered: Oil: 1 bbls ; PW: 900 bbls
Source of Release: 4" Nipple on collar of water tank	Date and Hour of Occurrence: 8/18/2014 10:30 am	Date and Hour of Discovery: 8/18/2014 10:30 am
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 / Jeffrey Robertson – BLM	
By Whom? Amanda Trujillo	Date and Hour: 8/18/2014 4:56 pm	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

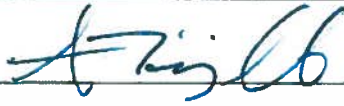
The release was caused by a corroded 4" nipple on the collar on the water tank. The tank was repaired. Vacuum trucks were dispatched to pick up all standing fluids. All fluids were disposed at an NMOCD approved facility.

Describe Area Affected and Cleanup Action Taken.*

The impacted area was contained to the bermed area, with no release to the pasture. 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.

OIL CONSERVATION DIVISION

Signature: 	Approved by Environmental Specialist:		
Printed Name: Amanda Trujillo			
Title: Senior Environmental Coordinator	Approval Date:	Expiration Date:	
E-mail Address: atrujillo@concho.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: August 29, 2014	Phone: 575-748-6940		

* Attach Additional Sheets If Necessary

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Title: Senior Environmental Coordinator	Approval Date:	Expiration Date:
E-mail Address: atrujillo@concho.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: November 5, 2014	Phone: 575-748-6940	

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