



Lupe Carrasco
Environmental Coordinator

May 7, 2015

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

**Re: SRO State Unit #46H
30-015-41866
Sec. 5, T26S-R28E
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 May 7, 2015.

Background

The release was caused by a damaged flow line that was run over by heavy equipment. The release originated on state land impacting the lease road and the adjacent pasture which is fee surface. The release path ranged from approximately 2-50' in width by 75 yards in length. The attached Site Diagram depicts the approximate area impacted by the release and approximate location of the points sampled.

Groundwater

Based on the New Mexico Office of the State Engineer Website, the release area would be classified at a site ranking of Zero with depth to groundwater at greater than 100' (Section 2&5, T26S-R28E).

Soil Assessment and Analytical Results

Sample points noted on the attached Site Diagram are labeled with an S to denote samples taken within the release area.

Sample results for TPH and BTEX were tested at the 1' depth for all sample points and proved to be non-detect based on the attached Analytical Results. Chloride results proved to be elevated to a depth of 2' for all sample points with the exception of S3 which proved to be non-detect at a 1' depth. Analytical Results and a Site Diagram with a Sample Summary Table have been attached for your consideration.

Work Plan

COG Operating LLC proposes the following excavation based on delineation samples taken within the impacted area:

S1- Excavate to a depth of 2.5' and backfill with like material.

S2- Excavate to a depth of 2.5' and backfill with like material.

S3- Scrape to a depth of 4-6" to remove surface staining

S4- Excavate to a depth of 2.5' and backfill with like material.

S1	Cl-
1'	18600
2'	5120
3'	624
S2	Cl-
1'	3040
2'	2160
3'	864
S3	Cl-
1'	ND
S4	Cl-
1'	6400
2'	1840
3'	32

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)

Section 5, T26S-R28E

Released: 100 bbls Produced Water
Recovered: 70 bbls Produced Water

S1	Cl-
1'	18600
2'	5120
3'	624
S2	Cl-
1'	3040
2'	2160
3'	864
S3	Cl-
1'	ND
S4	Cl-
1'	6400
2'	1840
3'	32

Legend



May 03, 2015

LUPE CARRASCO

COG OPERATING

P. O. BOX 1630

ARTESIA, NM 88210

RE: SRO STATE UNIT #46 H

Enclosed are the results of analyses for samples received by the laboratory on 04/24/15 8:00.

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/ga/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
LUPE CARRASCO
P. O. BOX 1630
ARTESIA NM, 88210
Fax To: NONE

Received: 04/24/2015
Reported: 05/03/2015
Project Name: SRO STATE UNIT #46 H
Project Number: NONE GIVEN
Project Location: NONE GIVEN

Sampling Date: 04/22/2015
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: S1 - 1' (H501066-01)

BTEX 8021B			mg/kg		Analyzed By: ms				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	04/27/2015	ND	2.19	110	2.00	1.10	
Toluene*	<0.050	0.050	04/27/2015	ND	1.97	98.7	2.00	0.692	
Ethylbenzene*	<0.050	0.050	04/27/2015	ND	1.87	93.5	2.00	0.124	
Total Xylenes*	<0.150	0.150	04/27/2015	ND	6.03	101	6.00	0.310	
Total BTEX	<0.300	0.300	04/27/2015	ND					

Surrogate: 4-Bromofluorobenzene (PIC) 113 % 61-154

Chloride, SM4500Cl-B			mg/kg		Analyzed By: AP				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	18600	16.0	04/27/2015	ND	432	108	400	3.77	

TPH 8015M			mg/kg		Analyzed By: MS				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	04/24/2015	ND	213	107	200	0.243	
DRO >C10-C28	<10.0	10.0	04/24/2015	ND	225	112	200	1.65	

Surrogate: 1-Chlorooctane 96.5 % 47.2-157

Surrogate: 1-Chlorooctadecane 90.9 % 52.1-176

Sample ID: S1 - 2' (H501066-02)

Chloride, SM4500Cl-B			mg/kg		Analyzed By: AP				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	5120	16.0	04/29/2015	ND	400	100	400	3.92	

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

COG OPERATING
LUPE CARRASCO
P. O. BOX 1630
ARTESIA NM, 88210
Fax To: NONE

Received: 04/24/2015
Reported: 05/03/2015
Project Name: SRO STATE UNIT #46 H
Project Number: NONE GIVEN
Project Location: NONE GIVEN

Sampling Date: 04/22/2015
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: S1 - 3' (H501066-03)

Chloride, SM4500CI-B			mg/kg		Analyzed By: AP				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	624	16.0	05/03/2015	ND	432	108	400	0.00	

Sample ID: S2 - 1' (H501066-08)

BTEX 8021B			mg/kg		Analyzed By: ms				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	04/27/2015	ND	2.19	110	2.00	1.10	
Toluene*	<0.050	0.050	04/27/2015	ND	1.97	98.7	2.00	0.692	
Ethylbenzene*	<0.050	0.050	04/27/2015	ND	1.87	93.5	2.00	0.124	
Total Xylenes*	<0.150	0.150	04/27/2015	ND	6.03	101	6.00	0.310	
Total BTEX	<0.300	0.300	04/27/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 116 % 61-154

Chloride, SM4500CI-B			mg/kg		Analyzed By: AP				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	3040	16.0	04/27/2015	ND	432	108	400	3.77	

TPH 8015M			mg/kg		Analyzed By: MS				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	04/24/2015	ND	213	107	200	0.243	
DRO >C10-C28	<10.0	10.0	04/24/2015	ND	225	112	200	1.65	

Surrogate: 1-Chlorooctane 99.6 % 47.2-157

Surrogate: 1-Chlorooctadecane 93.8 % 52.1-176

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*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:COG OPERATING
LUPE CARRASCO
P. O. BOX 1630
ARTESIA NM, 88210
Fax To: NONEReceived: 04/24/2015
Reported: 05/03/2015
Project Name: SRO STATE UNIT #46 H
Project Number: NONE GIVEN
Project Location: NONE GIVENSampling Date: 04/22/2015
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson**Sample ID: S2 - 2' (H501066-09)**

Chloride, SM4500Cl-B			mg/kg							Analyzed By: AP	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier		
Chloride	2160	16.0	04/29/2015	ND	400	100	400	3.92			

Sample ID: S2 - 3' (H501066-10)

Chloride, SM4500Cl-B			mg/kg							Analyzed By: AP	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier		
Chloride	864	16.0	05/03/2015	ND	432	108	400	0.00			

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

COG OPERATING
LUPE CARRASCO
P. O. BOX 1630
ARTESIA NM, 88210
Fax To: NONE

Received: 04/24/2015
Reported: 05/03/2015
Project Name: SRO STATE UNIT #46 H
Project Number: NONE GIVEN
Project Location: NONE GIVEN

Sampling Date: 04/22/2015
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: S3 - 1' (H501066-15)

BTEx 8021B			mg/kg		Analyzed By: ms				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	04/27/2015	ND	2.19	110	2.00	1.10	
Toluene*	<0.050	0.050	04/27/2015	ND	1.97	98.7	2.00	0.692	
Ethylbenzene*	<0.050	0.050	04/27/2015	ND	1.87	93.5	2.00	0.124	
Total Xylenes*	<0.150	0.150	04/27/2015	ND	6.03	101	6.00	0.310	
Total BTEX	<0.300	0.300	04/27/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 118 % 61-154

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	04/27/2015	ND	432	108	400	3.77	

TPH 8015M			mg/kg		Analyzed By: MS				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	04/24/2015	ND	213	107	200	0.243	
DRO >C10-C28	<10.0	10.0	04/24/2015	ND	225	112	200	1.65	

Surrogate: 1-Chlorooctane 97.9 % 47.2-157

Surrogate: 1-Chlorooctadecane 92.9 % 52.1-176

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

COG OPERATING
LUPE CARRASCO
P. O. BOX 1630
ARTESIA NM, 88210
Fax To: NONE

Received: 04/24/2015
Reported: 05/03/2015
Project Name: SRO STATE UNIT #46 H
Project Number: NONE GIVEN
Project Location: NONE GIVEN

Sampling Date: 04/22/2015
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: S4 - 1' (H501066-22)

BTEX 8021B			mg/kg		Analyzed By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	04/27/2015	ND	2.19	110	2.00	1.10		
Toluene*	<0.050	0.050	04/27/2015	ND	1.97	98.7	2.00	0.692		
Ethylbenzene*	<0.050	0.050	04/27/2015	ND	1.87	93.5	2.00	0.124		
Total Xylenes*	<0.150	0.150	04/27/2015	ND	6.03	101	6.00	0.310		
Total BTEX	<0.300	0.300	04/27/2015	ND						

Surrogate: 4-Bromofluorobenzene (PIC) 118 % 61-154

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	6400	16.0	04/27/2015	ND	432	108	400	3.77	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	04/24/2015	ND	213	107	200	0.243	
DRO >C10-C28	<10.0	10.0	04/24/2015	ND	225	112	200	1.65	

Surrogate: 1-Chlorooctane 97.8 % 47.2-157

Surrogate: 1-Chlorooctadecane 91.4 % 52.1-176

Sample ID: S4 - 2' (H501066-23)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1840	16.0	04/29/2015	ND	400	100	400	3.92	

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:COG OPERATING
LUPE CARRASCO
P. O. BOX 1630
ARTESIA NM, 88210
Fax To: NONEReceived: 04/24/2015
Reported: 05/03/2015
Project Name: SRO STATE UNIT #46 H
Project Number: NONE GIVEN
Project Location: NONE GIVENSampling Date: 04/22/2015
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson**Sample ID: S4 - 3' (H501066-24)**

Chloride, SM4500Cl-B			mg/kg							Analyzed By: AP	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier		
Chloride	32.0	16.0	05/03/2015	ND	432	108	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

Cardinal Laboratories

* = 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

Company Name: COG Operating LLC

Project Manager: Lupe Carrasco

Address: 2208 West Main

City: Artesia

Phone #: (575) 748-6940

Project #:

Project Name: SRO State Unit #46H

Project Location:

Sampler Name: Lupe Carrasco

FOR LAB USE ONLY

Lab I.D.

Sample I.D.

#501006

- 1 S1-1
- 2 S1-2
- 3 S1-3
- 4 S1-4
- 5 S1-6
- 6 S1-8
- 7 S1-10

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Relinquished By:

Relinquished By:

Delivered By: (Circle One)

Sampler - UPS - Bus - Other:
FORM-006 R2.0

BILL TO

ANALYSIS REQUEST

P.O. #:

Company: COG Operating LLC

Attn: Robert McNeill

Address: 600 W Illinois

City: Midland

State: TX Zip: 79701

Phone #: (432) 221-0388

Fax #:

MATRIX

PRESERV

SAMPLING

(G)RAB OR (C)OMP
CONTAINERS
GROUNDWATER
WASTEWATER
SOIL
OIL
SLUDGE
OTHER :
ACID/BASE
ICE / COOL
OTHER :

DATE TIME

BTEX

TPH

Chloride

add 4/28
add 4/30

Phone Result: ☐ Yes ☐ No Add'l Phone #:

Fax Result: ☐ Yes ☐ No Add'l Fax #:

REMARKS: gcarasco@concho.com atrujillo@concho.com, gmetel@concho.com

Run chloride samples until results fall below 100ppm

Sample Condition
Cool ☒ Intact ☐
Leak ☐ No ☐ No

CHECKED BY:

4:42

† Cardinal cannot accept verbal changes. Please fax written changes to 575-393-2476

#54



Page 11 of 12

Company Name: COG Operating LLC						BILL TO									
Project Manager: Lupe Carrasco						P.O. #:									
Address: 2208 West Main						Company: COG Operating LLC									
City: Artesia						Attn: Robert McNeill									
Phone #: (575) 748-6940						Address: 600 W Illinois									
Fax #: Project Owner:						City: Midland									
Project Name: SRO State Unit #46H						State: TX Zip: 79701									
Project Location:						Phone #: (432) 221-0388									
Sampler Name: Lupe Carrasco						Fax #:									
FOR LAB USE ONLY															
Lab I.D.						Sample I.D.									
H5C10B6						(G)RAB OR (C)OMP	# CONTAINERS	MATRIX		PRESERV	SAMPLING				
S3-1'						GROUNDWATER	DATE	TIME	BTEX						
S3-2'						WASTEWATER	4/22/15	X	X						
S3-3'						SOIL	4/22/15	X	X						
S3-4'						OIL	4/22/15	X	X						
S3-6'						SLUDGE	4/22/15	X	X						
S3-8'						OTHER :	4/22/15	X	X						
S3-10'						ACID/BASE	4/22/15	X	X						
						ICE / COOL									
						OTHER :									
PLEASE NOTE: Liability and Damages: Cardinal's liability and client's exclusive remedy for any claim arising whether based in contract or tort shall be limited to the amount paid by the client for the analyses. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subcontractors, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.															
Relinquished By:						Date Received By:	Time								
Reinquinshed By:						Date	Time								
Delivered By: (Circle One)						Sample Condition		CHECKED BY:							
Sampler - UPS - Bus - Other:						Cool Intact	(Initials)								
FORM-006 R 2.0						Yes No	No Yes								
4.4c															
Run chloride samples until results fall below 1000 ppm															



ANALYSIS REQUEST

SAMPLING

#54

by the client for the completion of the applicable item, its subsidiaries, affiliates or otherwise	Yes	No	Add'l Phone #:
Phone Result:	<input type="checkbox"/>	<input type="checkbox"/>	

Phone Result:	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Add'l Phone #:
Fax Result:	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Add'l Fax #:
REMARKS:	qccarrasco@concho.com		
atrujillo@concho.com, qmckel@concho.com			

below 1000 ppm

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: SRO State Unit #46H	Facility Type: Well

Surface Owner: State	Mineral Owner: State	API No. 30-015-41866
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LOCATION OF RELEASE

Unit Letter D	Section 5	Township 26S	Range 28E	Feet from the 190'	North/South Line North	Feet from the 550'	East/West Line West	County Eddy
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Latitude 32.0784096731862 Longitude -104.116248710771

NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: 100 bbls	Volume Recovered: 70 bbls
Source of Release: Poly Flowline	Date and Hour of Occurrence: 4/16/2015 12:00 am	Date and Hour of Discovery: 4/16/2015 12:00 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 - NMOCD	
By Whom? Amanda Trujillo	Date and Hour: 4/17/2015 2:19 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.*

This release was caused when a flowline was damaged after heavy equipment ran over the line. Vacuum trucks were dispatched to recover all standing fluid and dispose of at an NMOCD approved facility.

Describe Area Affected and Cleanup Action Taken.*

The affected area was the pasture to the north of the lease road. 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: May 7, 2015 Phone: 575-748-6940		

* Attach Additional Sheets If Necessary

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: SRO State Unit #46H	Facility Type: Well

Surface Owner: State	Mineral Owner: State	API No. 30-015-41866
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Title: Senior Environmental Coordinator	Approval Date:	Expiration Date:
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