



May 27, 2016

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

**Re: Dodd Federal Unit South Battery  
Sec. 22, T17S-R29E  
Eddy County, NM**

Mrs. Heather Patterson,

COG Operating LLC would like to submit for your consideration the enclosed closure plan for the above captioned well. The plan is in response to the C-141 Initial report dated January 13, 2016.

### **Background**

The release was caused when a pipe on the LACT cracked due to the cold weather emptying the oil production tank in the containment. The incident resulted in the release of approximately 50 barrels of oil of which zero barrels were recovered. Due to the inclement weather and impassable roads, the release was not discovered immediately. The released fluid was primarily contained within the containment, but some fluid did breach the containment and ran along the road. The attached site diagram depicts an approximate area of impact both inside the containment and along the road. Once operations was able to access the facility, a crew was dispatched to excavate 4-6" within the containment.

### **Groundwater**

Base on the information obtained through the New Mexico Office of the State Engineer, the release area would be classified at a site ranking of **Ten** with depth to groundwater at approximately 76' (RA 11807 POD1, Sec. 22, T17S-R29E).

### **Soil Assessment and Analytical Results**

Sample points for the release area are labeled as S1, S2, S3, and S4 on the attached Site Diagram. The points chosen were based on the associated safety hazards within the facility and along the road. According to the analytical results obtained, BTEX levels are non-detect and TPH levels are within RRAL's for a site ranking of Ten. A copy of the analytical results has been attached for your consideration.

## **Closure Plan**

COG Operating LLC proposes that no further excavation be required. If there are no objections or further stipulations, COG Operating LLC would like to request closure of this incident based on enclosed documentation. Upon approval of this closure plan the 4 – 6" excavation will be backfilled at the site.

Please feel free to contact me with any questions or concerns at (575) 748-6940.

Sincerely,



Amanda T. Davis  
Senior Environmental Coordinator

**Enclosure(s):**

Site Diagram  
Sample Summary Table  
Analytical Results  
C-141 Initial (Copy)



# Dodd Federal Unit South Battery

Sec. 22, T17S-R29E

Legend

- Sample Points
- Release Area

S1	BTEX	GRO	DRO	TPH
1'	ND	ND	299	299
2'	ND	ND	49.5	49.5
S2	BTEX	GRO	DRO	TPH
1'	ND	ND	ND	ND
2'	ND	ND	ND	ND
S3	BTEX	GRO	DRO	TPH
1'	ND	ND	145	145
2'	ND	ND	41.5	41.5
S4	BTEX	GRO	DRO	TPH
1'	ND	ND	ND	ND
2'	ND	ND	ND	ND

February 08, 2016

LUPE CARRASCO

COG OPERATING

P. O. BOX 1630

ARTESIA, NM 88210

RE: DODD FEDERAL UNIT SOUTH BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 02/03/16 13:00.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-15-7. 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](http://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,



Caley D. Keene

Lab Director/Quality Manager



**Analytical Results For:**

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

Received: 02/03/2016  
Reported: 02/08/2016  
Project Name: DODD FEDERAL UNIT SOUTH BATTERY  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 02/02/2016  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: S1 - 1' (H600246-01)**

BTEX 80218			mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	02/05/2016	ND	2.05	102	2.00	6.13		
Toluene*	<0.050	0.050	02/05/2016	ND	2.01	100	2.00	6.19		
Ethylbenzene*	<0.050	0.050	02/05/2016	ND	1.83	91.6	2.00	6.05		
Total Xylenes*	<0.150	0.150	02/05/2016	ND	5.54	92.3	6.00	5.65		
Total BTEX	<0.300	0.300	02/05/2016	ND						

Surrogate: 4-Bromofluorobenzene (PIL) 103 % 73.6-140

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	02/04/2016	ND	195	97.5	200	3.79			
DRO >C10-C28	299	10.0	02/04/2016	ND	199	99.3	200	2.63			

Surrogate: 1-Chlorooctane 76.4 % 35-147

Surrogate: 1-Chlorooctadecane 100 % 28-171

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: 02/03/2016  
 Reported: 02/08/2016  
 Project Name: DODD FEDERAL UNIT SOUTH BATTERY  
 Project Number: NONE GIVEN  
 Project Location: NOT GIVEN

 Sampling Date: 02/02/2016  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: S1 - 2' (H600246-02)**

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	02/05/2016	ND	1.95	97.3	2.00	4.20	
Toluene*	<0.050	0.050	02/05/2016	ND	1.91	95.4	2.00	4.45	
Ethylbenzene*	<0.050	0.050	02/05/2016	ND	1.73	86.7	2.00	5.09	
Total Xylenes*	<0.150	0.150	02/05/2016	ND	5.29	88.1	6.00	4.60	
Total BTEX	<0.300	0.300	02/05/2016	ND					

Surrogate: 4-Bromofluorobenzene (PIC) 102 % 73.6-140

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	02/04/2016	ND	195	97.5	200	3.79	
DRO >C10-C28	49.5	10.0	02/04/2016	ND	199	99.3	200	2.63	

Surrogate: 1-Chlorooctane 73.9 % 35-147

Surrogate: 1-Chlorooctadecane 81.2 % 28-171

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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: 02/03/2016  
Reported: 02/08/2016  
Project Name: DODD FEDERAL UNIT SOUTH BATTERY  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 02/02/2016  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: S2 - 1' (H600246-03)**

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	02/05/2016	ND	1.95	97.3	2.00	4.20	
Toluene*	<0.050	0.050	02/05/2016	ND	1.91	95.4	2.00	4.45	
Ethylbenzene*	<0.050	0.050	02/05/2016	ND	1.73	86.7	2.00	5.09	
Total Xylenes*	<0.150	0.150	02/05/2016	ND	5.29	88.1	6.00	4.60	
Total BTEX	<0.300	0.300	02/05/2016	ND					

Surrogate: 4-Bromofluorobenzene (PIC) 103 % 73.6-140

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	02/04/2016	ND	195	97.5	200	3.79	
DRO >C10-C28	<10.0	10.0	02/04/2016	ND	199	99.3	200	2.63	

Surrogate: 1-Chlorooctane 70.5 % 35-147

Surrogate: 1-Chlorooctadecane 72.7 % 28-171

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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: 02/03/2016  
Reported: 02/08/2016  
Project Name: DODD FEDERAL UNIT SOUTH BATTERY  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 02/02/2016  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: S2 - 2' (H600246-04)**

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	02/05/2016	ND	1.95	97.3	2.00	4.20	
Toluene*	<0.050	0.050	02/05/2016	ND	1.91	95.4	2.00	4.45	
Ethylbenzene*	<0.050	0.050	02/05/2016	ND	1.73	86.7	2.00	5.09	
Total Xylenes*	<0.150	0.150	02/05/2016	ND	5.29	88.1	6.00	4.60	
Total BTEX	<0.300	0.300	02/05/2016	ND					

Surrogate: 4-Bromofluorobenzene (PIC) 102 % 73 6-140

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	02/04/2016	ND	195	97.5	200	3.79	
DRO >C10-C28	<10.0	10.0	02/04/2016	ND	199	99.3	200	2.63	

Surrogate: 1-Chlorooctane 71.1 % 35-147

Surrogate: 1-Chlorooctadecane 72.6 % 28-171

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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: 02/03/2016  
 Reported: 02/08/2016  
 Project Name: DODD FEDERAL UNIT SOUTH BATTERY  
 Project Number: NONE GIVEN  
 Project Location: NOT GIVEN

 Sampling Date: 02/02/2016  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Jodi Henson

**Sample ID: S3 - 1' (H600246-05)**

BTEX 80218		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/05/2016	ND	1.95	97.3	2.00	4.20	
Toluene*	0.053	0.050	02/05/2016	ND	1.91	95.4	2.00	4.45	
Ethylbenzene*	0.076	0.050	02/05/2016	ND	1.73	86.7	2.00	5.09	
Total Xylenes*	0.158	0.150	02/05/2016	ND	5.29	88.1	6.00	4.60	
Total BTEX	<0.300	0.300	02/05/2016	ND					

Surrogate: 4-Bromofluorobenzene (PIE) 102 % 73 6-140

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	02/05/2016	ND	196	97.8	200	3.35	
DRO >C10-C28	145	10.0	02/05/2016	ND	192	96.1	200	4.12	

Surrogate: 1-Chlorooctane 71.5 % 35-147

Surrogate: 1-Chlorooctadecane 90.1 % 28-171

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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: 02/03/2016  
Reported: 02/08/2016  
Project Name: DODD FEDERAL UNIT SOUTH BATTERY  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 02/02/2016  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: S4 - 1' (H600246-06)**

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	02/05/2016	ND	1.95	97.3	2.00	4.20	
Toluene*	<0.050	0.050	02/05/2016	ND	1.91	95.4	2.00	4.45	
Ethylbenzene*	<0.050	0.050	02/05/2016	ND	1.73	86.7	2.00	5.09	
Total Xylenes*	<0.150	0.150	02/05/2016	ND	5.29	88.1	6.00	4.60	
Total BTEX	<0.300	0.300	02/05/2016	ND					

Surrogate: 4-Bromofluorobenzene (PIE) 103 % 73-140

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	02/05/2016	ND	196	97.8	200	3.35	
DRO >C10-C28	41.5	10.0	02/05/2016	ND	192	96.1	200	4.12	

Surrogate: 1-Chlorooctane 67.9 % 35-147

Surrogate: 1-Chlorooctadecane 72.2 % 28-171

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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: 02/03/2016  
Reported: 02/08/2016  
Project Name: DODD FEDERAL UNIT SOUTH BATTERY  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 02/02/2016  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: S4 - 2' (H600246-07)**

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	02/05/2016	ND	1.95	97.3	2.00	4.20	
Toluene*	<0.050	0.050	02/05/2016	ND	1.91	95.4	2.00	4.45	
Ethylbenzene*	<0.050	0.050	02/05/2016	ND	1.73	86.7	2.00	5.09	
Total Xylenes*	<0.150	0.150	02/05/2016	ND	5.29	88.1	6.00	4.60	
Total BTEX	<0.300	0.300	02/05/2016	ND					

Surrogate: 4-Bromofluorobenzene (PIC) 103 % 73.6-140

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	02/05/2016	ND	196	97.8	200	3.35	
DRO >C10-C28	<10.0	10.0	02/05/2016	ND	192	96.1	200	4.12	

Surrogate: 1-Chlorooctane 67.8 % 35-147

Surrogate: 1-Chlorooctadecane 72.8 % 28-171

Cardinal Laboratories

\*=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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Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



**101 East Marland, Hobbs, NM 88240  
(575) 393-2326 FAX (575) 393-2476**

Page 10 of 10



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: Dodd Federal Unit South Battery	Facility Type: Battery	
Surface Owner: Federal	Mineral Owner:	API No.

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
J	22	17S	29E					Eddy

Latitude 32.816895 Longitude -104.060867

**NATURE OF RELEASE**

Type of Release: Oil	Volume of Release: 50 bbls Oil	Volume Recovered: 0 bbls Oil
Source of Release: LACT	Date and Hour of Occurrence: 12/30/2015 11:00 am	Date and Hour of Discovery: 1/5/2015 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? Mr. Bratcher – NMOCD / Mr. Amos – BLM	
By Whom? Amanda Trujillo Davis	Date and Hour: Wed 1/6/2016 3:40 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 pipe on the LACT cracked due to the cold weather. It caused the oil in the production tank to empty into the containment. Due to the inclement weather and impassable roads the release was not discovered immediately. Hydro Vacs were dispatched to recover standing fluid.

Describe Area Affected and Cleanup Action Taken.\*

This release occurred primarily within the battery however some fluid breached the containment and ran along the road. COG completed the reclamation of this area under the guidance on NMOCD and BLM.

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: <i>Amanda T. Davis</i>		<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Amanda Trujillo Davis		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:	
Date: May 27, 2016 Phone: 575-748-6940		Attached <input type="checkbox"/>	

\* Attach Additional Sheets If Necessary