

# Closure Report

## Site Description

Site Name:	Harper State #001
Company:	COG Operating LLC
Legal Description:	U/L P, Section 16, T17S, R30E
County:	Eddy County, NM
GPS Coordinates:	N 32.82850° W 103.96950°

## Release Data

Date of Release:	04/06/2016
Type of Release:	Produced water
Source of Release:	Heater treater
Volume of Release:	13 bbls
Volume Recovered:	11 bbls

## Remediation Specifications

Remediation Parameters:	Excavate the entire spill area to a depth of 1.5 feet or as practicable. Backfill the site with clean soil. .	
Remediation Activities:	09/16/2016 to 09/19/2016	
Plan Sent to OCD:	07/11/2016	Email from Cliff Brunson to Mike Bratcher
OCD Approval of Plan:	07/22/2016	Email from Mike Bratcher to Cliff Brunson
Plan Sent to SLO:	07/22/2016	Email from Cliff Brunson to Amber Groves
BLM Approval of Plan:	08/01/2016	Email from Amber Groves to Cliff Brunson

## Supporting Documentation

Initial C-141	Signed 04/21/2016
Final C-141	Signed 09/23/2016
Site Diagram	April 2016
Groundwater Plot	300'
TOPO Maps	June 2016
Lab Summary	05/25/2016
Lab Analysis	05/25/2016
Correspondence	Request and approval of remediation plan via email

## Request for Closure

Based on the completion of the remediation plan as agreed upon, BBC International requests closure approval from NMOCD.

Cliff Brunson, President of BBC International Inc.

09/27/2016

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: HARPER STATE #001	Facility Type: Battery

Surface Owner: State	Mineral Owner: State	API No. 30-015-30831
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### LOCATION OF RELEASE

Unit Letter P	Section 16	Township 17S	Range 30E	Feet from the 430'	North/South Line South	Feet from the 330'	East/West Line East	County Eddy
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Latitude 32.8285027 Longitude -103.9695053

### NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: 13 bbls	Volume Recovered: 11 bbls
Source of Release: Heater treater	Date and Hour of Occurrence: 4/6/2016 12:00pm	Date and Hour of Discovery: 4/6/2016 12:00pm
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.\*

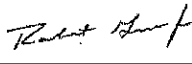
Describe Cause of Problem and Remedial Action Taken.\*

This release was caused by a hole in the firetube. A vacuum truck was dispatched to recover standing fluid.

Describe Area Affected and Cleanup Action Taken.\*

This release occurred within the bermed facility. 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: Robert Grubbs Jr.		Approved by Environmental Specialist:	
Title: Senior Environmental Coordinator		Approval Date:	Expiration Date:
E-mail Address: rgrubbs@concho.com		Conditions of Approval:	
Date: April 21, 2016 Phone: 432-683-7443		Attached <input type="checkbox"/>	

\* 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: Harper State #001	Facility Type: Battery

Surface Owner: State	Mineral Owner: State	API No. 30-015-30831
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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
P	16	17S	30E	430	South	330	East	Eddy County, NM

Latitude N 32.82850° Longitude W 103.96950°

**NATURE OF RELEASE**

Type of Release: Produced water	Volume of Release: 13 bbls	Volume Recovered: 11 bbls
Source of Release: Heater treater	Date and Hour of Occurrence 04/06/2016 @ 12:00 pm	Date and Hour of Discovery 04/06/2016 @ 12:00 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 a hole in the fire tube. A vacuum truck was dispatched to recover all free-standing fluids.

Describe Area Affected and Cleanup Action Taken.\*

This release was contained within the bermed facility. The site was delineated and a remediation plan was developed. The remediation plan was approved by Mike Bratcher of NMOCD via email on 07/22/2016 and approved by Amber Groves of the SLO via email on 08/01/2016. Remediation was completed in accordance with the approved plan.

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: Robert Grubbs			
Title: Senior Environmental Coordinator	Approval Date:	Expiration Date:	
E-mail Address: rgrubbs@concho.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: September 23, 2016	Phone: (432) 683-7443		

\* Attach Additional Sheets If Necessary



# Harper State Tank Battery

## Legend

-  Release Area
-  Sample Points



Google earth

100 ft







# Groundwater Plot

## Concho Harper State #001 TB

County  
Eddy

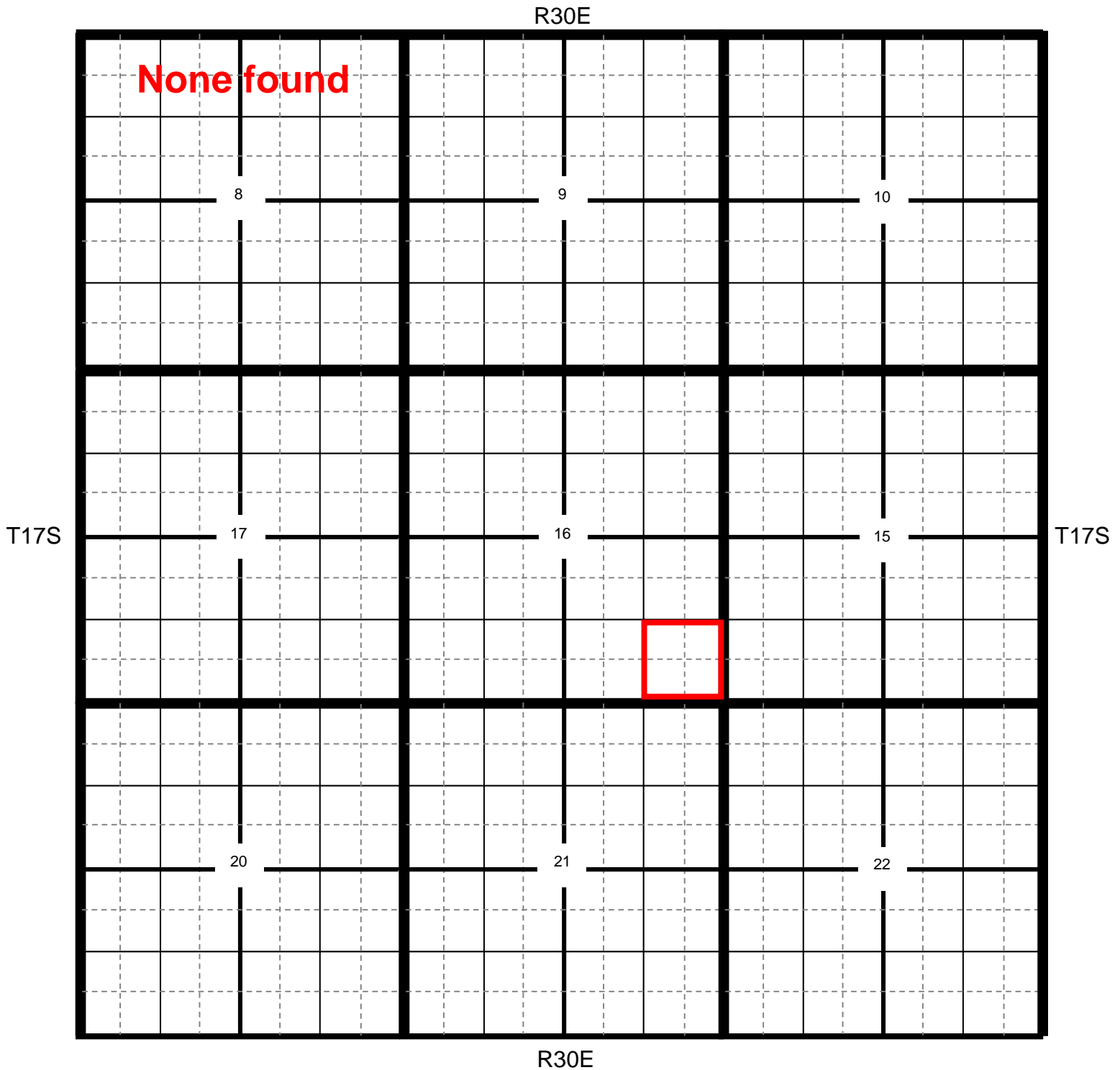
Unit Letter  
P

Section  
16

Township  
17S

Range  
30E

Trend Map 300'



📍 Location

● OCD

● USGS

● SEO

● All Databases

## Concho Harper State #001 TB

<b>County</b> Eddy	<b>Unit Letter</b> P	<b>Section</b> 16	<b>Township</b> 17S	<b>Range</b> 30E
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Trend Map 300'

1

2

NW/NW <b>None found</b>	NE/NW	NW/NE	NE/NE
Unit Letter D	Unit Letter C	Unit Letter B	Unit Letter A
SW/NW	SE/NW	SW/NE	SE/NE
Unit Letter E	Unit Letter F	Unit Letter G	Unit Letter H
NW/SW	NE/SW	NW/SE	NE/SE
Unit Letter L	Unit Letter K	Unit Letter J	Unit Letter I
SW/SW	SE/SW	SW/SE	SE/SE
Unit Letter M	Unit Letter N	Unit Letter O	Unit Letter P

3

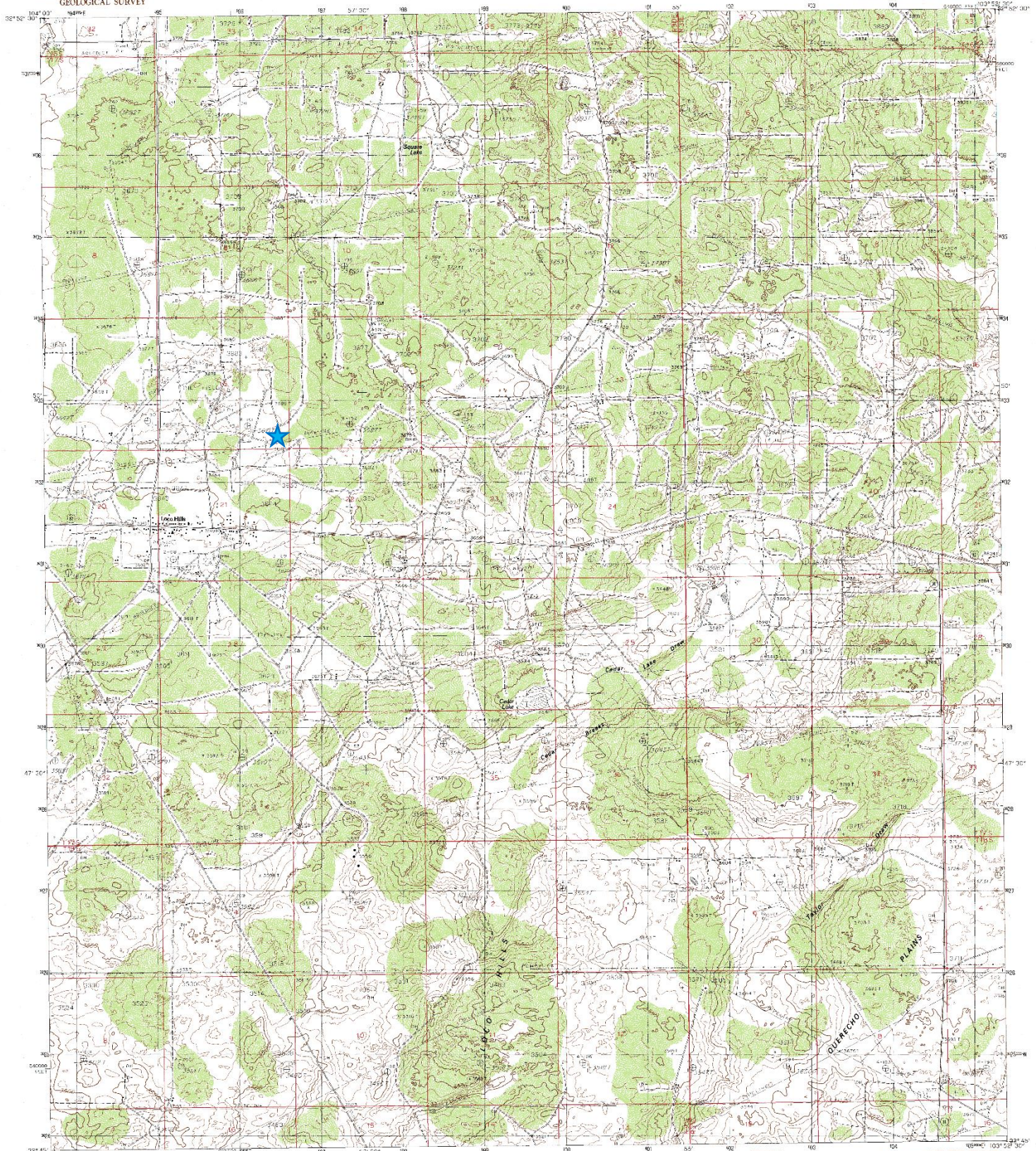
4



# Harper State #001 TB

LOCO HILLS QUADRANGLE  
NEW MEXICO-EDDY CO.  
7.5 MINUTE SERIES (TOPOGRAPHIC)

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
GEOLOGICAL SURVEY



PRODUCED BY THE UNITED STATES GEOLOGICAL SURVEY  
CONTROL BY ..... U.S. 2006/04/04  
FIELD CHECKED BY ..... JUNE 8  
MAP EDITED BY .....  
PROJECTION ..... TRANSVERSE MERCATOR  
.....  
10000-FOOT STATE GRID TICS ..... NEW MEXICO, EAST ZONE  
.....  
U.S. GRID ORIENTATION .....  
.....  
VERTICAL DATUM ..... NATIONAL GEODETIC VERTICAL DATUM OF 1929  
.....  
To place on the predicted North American Datum of 1983,  
move the projection lines as shown by dashed corner ticks  
(8 meters south and 47 meters east)  
There must be private inclusions within the boundaries of any  
..... on this map  
All marginal data and lettering generated and positioned by  
automated type placement procedures

PROVISIONAL MAP  
Produced from original  
manuscript drawings. Infor-  
mation shown as of date of  
field check. 3

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS  
FOR SALE BY U.S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225  
OR RESTON, VIRGINIA 22092

1	2	3	1 Hale Well
			2 Hawshaw Tact
4		5	3 Mojave NP
			4 Red Lake (E)
			5 Kildrener
6	7	8	6 Hisco Camp NE
			7 Blackberry Lake
			8 Greenwood Lake

ADDRESSING 7.5' QUADRANGLE NAMES

ROAD LEGEND

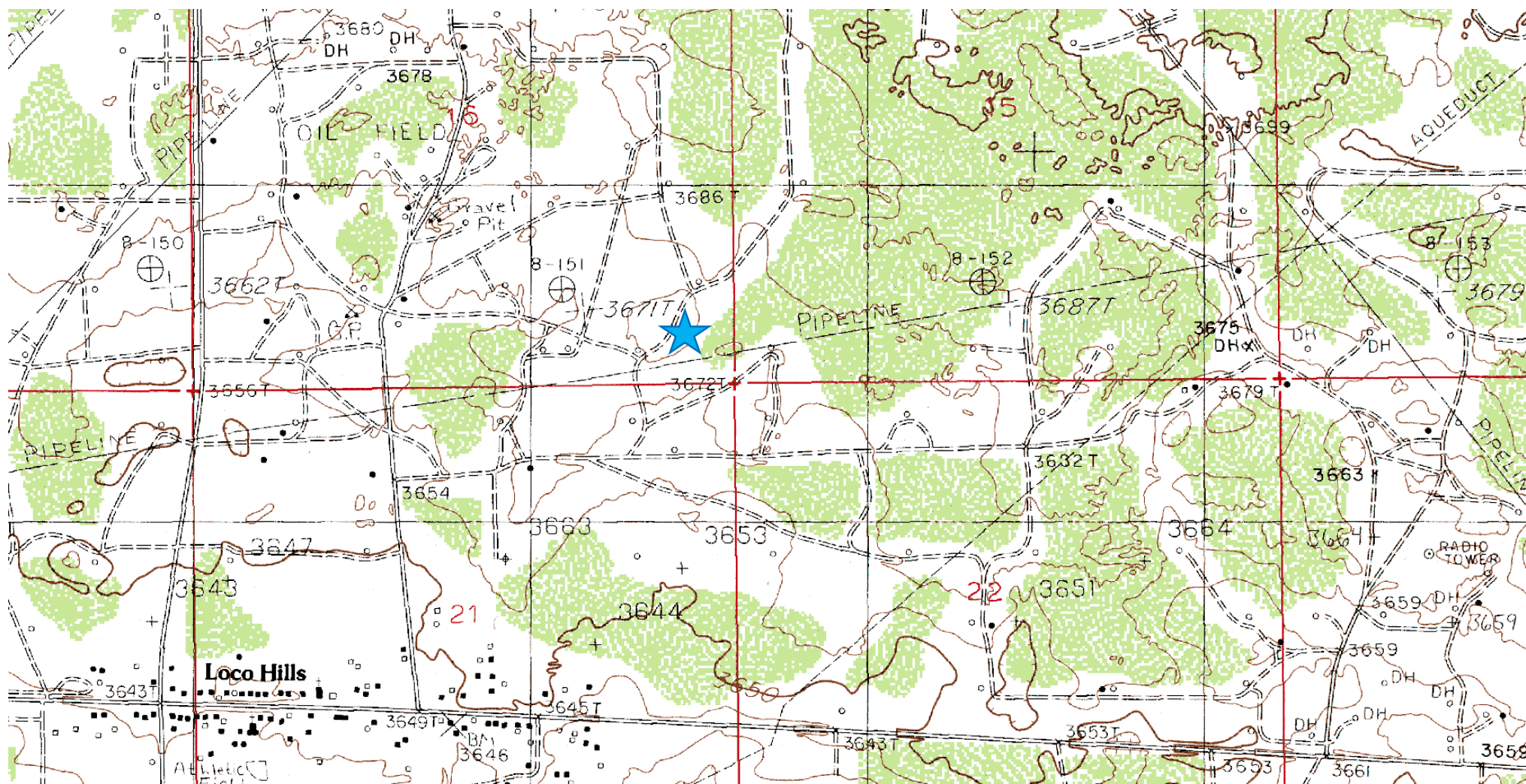
Improved Road .....  
Unimproved Road .....  
Trail .....  
 Interstate Route    U.S. Route    State Route

LOCO HILLS, NEW MEXICO  
PROVISIONAL EDITION 1985

32103-G8-TT-024



# Harper State #001 TB





**Laboratory Analytical Results Summary  
Harper State #001 Tank Battery**

		SP1 @ 1'	SP1 @ 2'	SP1 @ 3'	SP1 @ 4'	SP1 @ 5'
Analyte	Method	5/25/16	5/25/16	5/25/16	5/25/16	5/25/16
		mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
<b>Benzene</b>	BTEX 8021B	<0.050	<0.050	n/a	n/a	n/a
<b>Toluene</b>	BTEX 8021B	<0.050	<0.050	n/a	n/a	n/a
<b>Ethylbenzene</b>	BTEX 8021B	<0.050	<0.050	n/a	n/a	n/a
<b>Total Xylenes</b>	BTEX 8021B	<0.150	<0.150	n/a	n/a	n/a
<b>Total BTEX</b>	BTEX 8021B	<0.300	<0.300	n/a	n/a	n/a
<b>Chloride</b>	SM4500Cl-B	<b>2840</b>	<b>416</b>	<b>32</b>	<b>256</b>	<16.0
<b>GRO</b>	TPH 8015M	<10.0	<10.0	n/a	n/a	n/a
<b>DRO</b>	TPH 8015M	<10.0	<10.0	n/a	n/a	n/a



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

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June 06, 2016

LUPE CARRASCO

COG OPERATING

P. O. BOX 1630

ARTESIA, NM 88210

RE: HARPER STATE #001

Enclosed are the results of analyses for samples received by the laboratory on 06/01/16 11:00.

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,

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: 06/01/2016  
Reported: 06/06/2016  
Project Name: HARPER STATE #001  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 05/25/2016  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: S1 - 1' (H601196-01)**

BTX 8021B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/02/2016	ND	1.90	94.8	2.00	0.348	
Toluene*	<0.050	0.050	06/02/2016	ND	1.96	98.0	2.00	0.426	
Ethylbenzene*	<0.050	0.050	06/02/2016	ND	1.81	90.3	2.00	0.271	
Total Xylenes*	<0.150	0.150	06/02/2016	ND	5.60	93.3	6.00	0.347	
Total BTX	<0.300	0.300	06/02/2016	ND					

Surrogate: 4-Bromofluorobenzene (PID) 101 % 73.6-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	2840	16.0	06/06/2016	ND	416	104	400	3.92		

TPH 8015M		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	06/03/2016	ND	197	98.7	200	5.73	
DRO >C10-C28	<10.0	10.0	06/03/2016	ND	209	104	200	6.78	

Surrogate: 1-Chlorooctane 79.7 % 35-147

Surrogate: 1-Chlorooctadecane 97.9 % 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: 06/01/2016  
Reported: 06/06/2016  
Project Name: HARPER STATE #001  
Project Number: NONE GIVEN  
Project Location: NOT GIVEN

Sampling Date: 05/25/2016  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson

**Sample ID: S1 - 2' (H601196-02)**

BTEx 8021B		mg/kg		Analyzed By: CK						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	06/02/2016	ND	1.90	94.8	2.00	0.348		
Toluene*	<0.050	0.050	06/02/2016	ND	1.96	98.0	2.00	0.426		
Ethylbenzene*	<0.050	0.050	06/02/2016	ND	1.81	90.3	2.00	0.271		
Total Xylenes*	<0.150	0.150	06/02/2016	ND	5.60	93.3	6.00	0.347		
Total BTEx	<0.300	0.300	06/02/2016	ND						

Surrogate: 4-Bromofluorobenzene (PID) 100 % 73.6-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	416	16.0	06/06/2016	ND	416	104	400	3.92	

TPH 8015M		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	06/03/2016	ND	197	98.7	200	5.73	
DRO >C10-C28	<10.0	10.0	06/03/2016	ND	209	104	200	6.78	

Surrogate: 1-Chlorooctane 61.6 % 35-147

Surrogate: 1-Chlorooctadecane 81.6 % 28-171

**Sample ID: S1 - 3' (H601196-03)**

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	06/06/2016	ND	416	104	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: 06/01/2016  
Reported: 06/06/2016  
Project Name: HARPER STATE #001  
Project Number: NONE GIVEN  
Project Location: NOT GIVENSampling Date: 05/25/2016  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Jodi Henson**Sample ID: S1 - 4' (H601196-04)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	256	16.0	06/06/2016	ND	416	104	400	3.92		

**Sample ID: S1 - 5' (H601196-05)**

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	06/06/2016	ND	416	104	400	3.92	

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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





# CARDINAL Laboratories

## 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: Harper State #001

Project Location:

Sampler Name: Lupe Carrasco

### 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 #:

FOR LAB USE ONLY

Lab I.D.

Sample I.D.

H100196

1  
2  
3  
4  
5

S1-1'  
S1-2'  
S1-3'  
S1-4'  
S1-5'

(G)RAB OR (C)OMP.

# CONTAINERS

GROUNDWATER

WASTEWATER

SOIL

OIL

SLUDGE

OTHER :

ACID/BASE:

ICE / COOL

OTHER :

DATE

TIME

BTEX

TPH

Chloride

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 analysis. 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 subsidiaries, 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:

Time:

Received By:

Date:

Time:

Phone Result:

Fax Result:

REMARKS:

atrujillo@concho.com

Phone Result:

Fax Result:

REMARKS:

atrujillo@concho.com

Phone Result:

Fax Result:

REMARKS:

Relinquished By:

Date:

Time:

Received By:

Date:

Time:

Phone Result:

Fax Result:

REMARKS:

atrujillo@concho.com

Phone Result:

Fax Result:

REMARKS:

atrujillo@concho.com

Phone Result:

Fax Result:

Delivered By: (Circle One)

Sampler - UPS - Bus - Other:

FORM-006 R 2.0

Sample Condition

CHECKED BY:

atrujillo@concho.com

Phone Result:

Fax Result:

REMARKS:

atrujillo@concho.com

Phone Result:

Fax Result:

REMARKS:

atrujillo@concho.com

Phone Result:

Fax Result:

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

## Kathy Purvis

---

**From:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>  
**Sent:** Friday, July 22, 2016 11:11 AM  
**To:** Cliff Brunson  
**Cc:** Robert Grubbs; Patterson, Heather, EMNRD; Ken Swinney; Jennifer Gilkey; Kathy Purvis; 'agroves@slo.state.nm.us'  
**Subject:** RE: COG Harper State Tank Battery - Remediation Plan

RE: COG \* Harper St 1 \* **2RP-3657** \* DOR: 4/6/16

Cliff,

Your proposal for remediation of the above referenced release is approved. Please advise once remedial activities have been scheduled.

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

If you have any questions or concerns, and for notification, please contact me.

Mike Bratcher  
NMOCD District 2  
811 S. First Street  
Artesia, NM 88210  
O: 575-748-1283 X108  
C: 575-626-0857  
F: 575-748-9720

---

**From:** Cliff Brunson [mailto:cbrunson@bbcinternational.com]  
**Sent:** Monday, July 11, 2016 5:15 PM  
**To:** Bratcher, Mike, EMNRD  
**Cc:** Robert Grubbs; Patterson, Heather, EMNRD; Ken Swinney; Jennifer Gilkey; Kathy Purvis  
**Subject:** COG Harper State Tank Battery - Remediation Plan

Mike,

This e-mail is to confirm our discussion concerning the remediation plan for the COG Harper State Tank Battery release. I have attached the information packet that we used in our discussion with a cover page describing the remediation plan that we agreed upon.

If you would please reply back via e-mail with your concurrence on this plan, it would be greatly appreciated.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS  
President

BBC International, Inc.  
World-Wide Environmental Specialists  
Mailing Address:  
P. O. Box 805  
Hobbs, NM 88241-0805 USA  
Shipping Address:  
1324 W. Marland St.  
Hobbs, NM 88240 USA  
Phone: (575) 397-6388  
Fax: (575) 397-0397  
E-Mail: [cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)

\*\*\*\*\*  
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\*\*\*\*\*



**From:** [Groves, Amber](#)  
**To:** [Bratcher, Mike, EMNRD](#); [Cliff Brunson](#)  
**Cc:** [Robert Grubbs](#); [Patterson, Heather, EMNRD](#); [Ken Swinney](#); [Jennifer Gilkey](#); [Kathy Purvis](#)  
**Subject:** RE: COG Harper State Tank Battery - Remediation Plan  
**Date:** Monday, August 1, 2016 7:55:01 AM  
**Attachments:** [image001.png](#)  
[image003.png](#)

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Cliff,

NMSLO agrees with work plan approval.

Thank you,

**Amber Groves**

*Remediation Specialist*

*Field Operations Division*

(575)392-3697

(575)263-3209 cell

New Mexico State Land Office

2827 N. Dal Paso Suite 117

Hobbs, NM 88260

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**From:** Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]  
**Sent:** Friday, July 22, 2016 11:11 AM  
**To:** Cliff Brunson <cbrunson@bbcinternational.com>  
**Cc:** Robert Grubbs <RGrubbs@concho.com>; Patterson, Heather, EMNRD <Heather.Patterson@state.nm.us>; Ken Swinney <kswinney@bbcinternational.com>; Jennifer Gilkey <jgilkey@bbcinternational.com>; Kathy Purvis <kathy@bbcinternational.com>; Groves, Amber <agroves@slo.state.nm.us>  
**Subject:** RE: COG Harper State Tank Battery - Remediation Plan

RE: COG \* Harper St 1 \* **2RP-3657** \* DOR: 4/6/16

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Thanks, Cliff

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