

#### 2057 Commerce Drive Midland, TX 79703

432.520.7720 PHONE 432.520.7701 FAX

www.trcsolutions.com

September 6, 2017

Mike Bratcher New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division, District 2 811 S. First Street Artesia, NM 88210

**Amber Groves** Hobbs Field Office New Mexico State Land Office 2827 N. Dal Paso St., Suite 117 Hobbs, New Mexico 88240

Re: Soil Investigation Summary and Proposed Remediation Workplan State GQ Com #003H (2RP-4139) GPS: N 32.1509857° W 104.1195908° Unit Letter "A", Section 7, Township 25 South, Range 28 East

Eddy County, New Mexico

Dear Mr. Bratcher and Ms. Groves.

TRC Environmental Corporation (TRC), on behalf of COG Operating, LLC (COG) has prepared this Soil Investigation Summary and Proposed Remediation Workplan (Workplan) for the State GQ Com #003H Release Site (Release Site). The purpose of this Workplan is to propose remediation activities designed to advance the State GQ Com #003H Release Site toward a New Mexico Oil Conservation Division (NMOCD) approved Site Closure Status. The legal description of the Release Site is Unit Letter "A", Section 7, Township 25 South, Range 28 East, in Eddy County, New Mexico. The GPS coordinates for the site are N 32.1509857° W 104.1195908°. The subject property is administered by the New Mexico State Land Office (NMSLO). A Site Location Map and Site Map are provided as Figure 1 and Figure 2, respectively.

On March 3, 2017, COG discovered a produced water release from a three (3) inch steel pipeline. The release flowed to the northeast and southeast of the release point and measured approximately 2,376 square feet in area. On March 7, 2017, a Release Notification and Corrective Action (Form C-141) was submitted to the NMOCD. During initial response activities, COG repaired and replaced the damaged section of the three (3) inch pipeline. Approximately twenty (20) barrels of fluid was released from the pipeline, with eighteen (18) barrels recovered. The Form C-141 is attached to this report.

A groundwater database maintained by The New Mexico Office of the State Engineer (NMOSE) identified one (1) registered water well in Section 7, Township 25 South, Range 28 East. However, information on the well listed the installation depth and date for the well with no reference to the observed depth to groundwater. A reference map utilized by the NMOCD Hobbs District Office indicates groundwater should be encountered at approximately forty (40) to fifty (50) feet below ground surface (bgs). Based on the NMOCD site classification system, twenty (20) points will be assigned to the subject area ranking as a result of this criterion.

No water wells were observed within one-thousand (1,000) feet of the Release Site. Based on the NMOCD site classification system, zero (0) points will be assigned to the subject area ranking as a result of this criterion.

No surface water was observed within one-thousand (1,000) feet of the release. Based on the NMOCD site classification system, zero (0) points will be assigned to the subject area ranking as a result of this criterion.

Based on the NMOCD Site Classification criteria, the Release Site soil remediation levels are 10 milligrams per Kilogram (mg/Kg) for benzene, 50 mg/Kg for benzene, toluene, ethylbenzene and xylenes (BTEX), and one hundred (100) mg/Kg for total petroleum hydrocarbons (TPH). Per NMOCD request, chloride remediation levels for the Release Site will be 250 mg/Kg.

On March 16, 2017, a COG representative collected twenty (20) delineation soil samples from the impacted area (see attached Figure 2 and Table 1 for sample locations and analytical results). The soil samples were submitted to Xenco Laboratories in Midland, Texas for determination of concentration of chloride using Method 300/300.1. Chloride concentrations ranged from <10.0 mg/Kg for soil sample T1-2' to 7,070 mg/Kg for soil sample T1-Surface. A review of laboratory analytical results indicated chloride concentrations were below NMOCD regulatory guidelines for the submitted soil samples, with the exception of soil samples T1-Surface (7,070 mg/Kg), T1-1' (957 mg/Kg), T1-10' (329 mg/Kg), T2-Surface (5,920 mg/Kg), and T2-1' (997 mg/Kg).

Based on the laboratory analytical results of the soil samples collected at depths of approximately two (2) feet bgs to eight (8) feet bgs, twelve (12) feet bgs, and fourteen (14) feet bgs from trench T1, soil sample T1-10' (329 mg/Kg) appears to be an anomalous chloride concentration and does not appear to accurately represent chloride concentrations at ten (10) feet bgs.

Based on the analytical results of the soil samples collected on March 16, 2017, COG proposes the following field activities designed to remediate the State GQ Com #003H:

- Utilizing a backhoe, excavate the Release Site to a depth of approximately one and one half (1.5) feet below ground surface (bgs). The excavated soil will be stockpiled on a plastic liner adjacent to the excavation pending transportation to a NMOCD approved disposal facility.
- Collect an appropriate number of excavation floor soil samples, spaced at approximately every fifty (50) feet, and submit the soil samples to the laboratory for determination of concentrations of BTEX and TPH. In addition, a minimum of four (4) soil samples will be collected to the north, south, east and west of the excavated area to confirm horizontal delineation of the impacted soil and submitted for BTEX, TPH, and chloride analysis.

- Based on the laboratory analytical results of the soil samples collected at depths of approximately two (2) feet bgs to eight (8) feet bgs, twelve (12) feet bgs, and fourteen (14) feet bgs from trench T1, soil sample T1-10' (329 mg/Kg) appears to be an anomalous chloride concentration and does not appear to accurately represent chloride concentrations at ten (10) feet bgs. Therefore, no additional delineation activities appear to be warranted in the area represented by trench T1.
- On receipt of favorable analytical results (below NMOCD regulatory guidelines referenced above), the excavation will be backfilled with locally purchased non-impacted "like" soil.
- The excavated soil will be transported under manifest to an NMOCD approved disposal facility.
- Prepare and submit a "Remediation Summary and Site Closure Request" to the NMOCD and NMSLO.

COG is prepared to begin the activities outlined in this Soil Investigation Summary and Proposed Remediation Workplan on NMOCD and NMSLO approval.

If you have any questions, or if additional information is required, please feel free to call me at 432-520-7720 (office) or 432-664-6699 (cell).

Thank you,

Nikki Green Project Manager

TRC Environmental Corporation

Nikki Duen

Jeffrey Kindley, PG Senior Project Manager

TRC Environmental Corporation

Attachments:

Figure 1 - Site Location Map

Figure 2 - Site Map

Table 1 - Concentration of Chloride in Soil

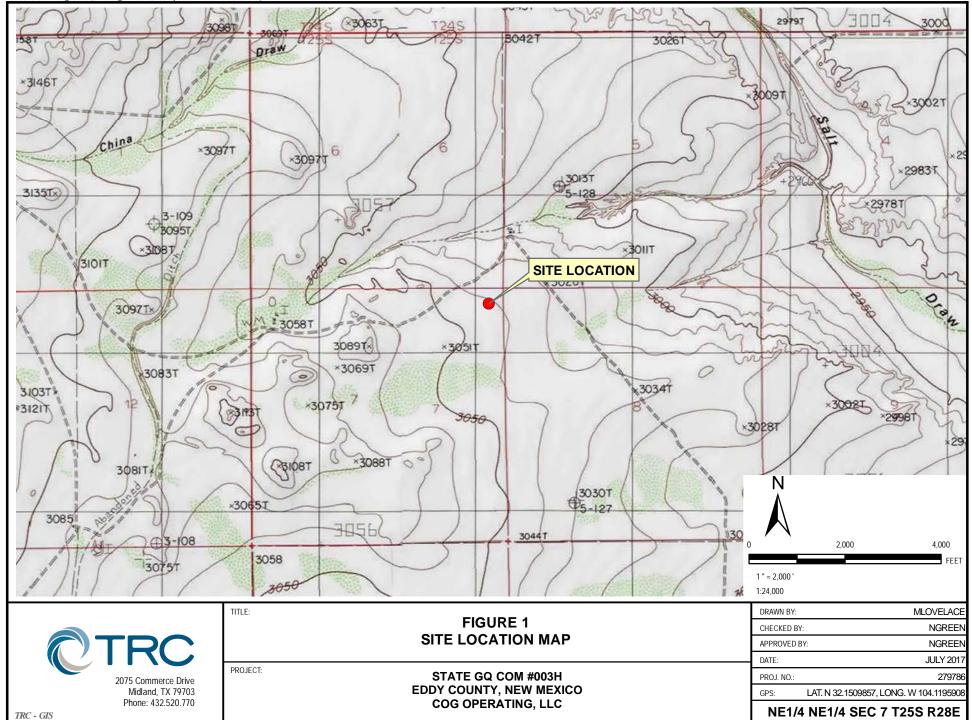
Laboratory Analytical Results

Release Notification and Corrective Action (Form C-141)

cc: Rebecca Haskell

COG Operating, LLC 600 W. Illinois Avenue Midland, Texas 79701

File







2075 Commerce Drive Midland, TX 79703 Phone: 432.520.770

PROJECT:

STATE GQ COM #003H **EDDY COUNTY, NEW MEXICO** COG OPERATING, LLC.

DRAWN I	BY: MLOVELACE
CHECKE	D BY: NGREEN
APPROV	ED BY: NGREEN
DATE:	AUGUST 2017
PROJ. NO	o.: <b>279786</b>
GPS:	LAT. N 32.1509857, LONG. W 104.1195908

NE1/4 NE1/4 SEC 7 T25S R28E

#### TABLE 1

#### CONCENTRATION OF CHLORIDE IN SOIL

# COG Operating LLC State GQ Com #003H EDDY COUNTY, NEW MEXICO

All concentrations are reported in mg/Kg

	SAMPLE	SOIL	E 300.1
SAMPLE LOCATION	DATE	STATUS	CHLORIDE
NMOCD Site Classification Criteria			250
T1-Surface	03/16/17	Trench	7,070
T1-1'	03/16/17	Trench	957
T1-2'	03/16/17	Trench	<10.0
T1-3'	03/16/17	Trench	24.4
T1-4'	03/16/17	Trench	55.2
T1-6'	03/16/17	Trench	46.5
T1-8'	03/16/17	Trench	127
T1-10'	03/16/17	Trench	329
T1-12'	03/16/17	Trench	120
T1-14'	03/16/17	Trench	66.7
T2-Surface	03/16/17	Trench	5,920
T2-1'	03/16/17	Trench	997
T2-2'	03/16/17	Trench	126
T2-3'	03/16/17	Trench	46.6
T2-4'	03/16/17	Trench	35.4
T2-6'	03/16/17	Trench	12.7
T2-8'	03/16/17	Trench	17.4
T2-10'	03/16/17	Trench	53.2
T2-12'	03/16/17	Trench	75.0
T2-14'	03/16/17	Trench	196



COG Operating LLC, Artesia, NM

**Project Name: State GC #3** 



**Project Id:** 

Contact: Dakota Neel

**Project Location:** 

**Date Received in Lab:** Sat Mar-25-17 10:30 am

**Report Date:** 06-APR-17 **Project Manager:** Kelsey Brooks

	Lab Id:	549471-0	01	549471-0	02	549471-0	03	549471-0	)4	549471-0	05	549471-0	06
Analysis Requested	Field Id:	T1 - Surfa	ice	T1 - 1'		T1 - 2'	T1 - 2'		T1 - 3'		T1 - 4'		
Anaiysis Kequesiea	Depth:			1 ft		2 ft		3 ft		4 ft		6 ft	
	Matrix:	SOIL		SOIL		SOIL		SOIL		SOIL		SOIL	
	Sampled:	Mar-16-17 1	Mar-16-17 12:30		Mar-16-17 12:31		2:35	Mar-16-17 1	2:40	Mar-16-17 1	2:45	Mar-16-17 12:50	
Inorganic Anions by EPA 300/300.1	Extracted:	Apr-03-17 1	8:00	Apr-03-17 1	8:00	Apr-03-17 1	7:00	Apr-03-17 1	7:00	Apr-03-17 1	7:00	Apr-03-17 1	7:00
SUB: TX104704215	Analyzed:	Apr-04-17 0	1:44	Apr-04-17 0	1:54	Apr-04-17 0	3:46	Apr-04-17 0	4:14	Apr-04-17 0	4:23	Apr-04-17 0	4:33
	Units/RL:	mg/kg	RL	mg/kg	RL	mg/kg	RL	mg/kg	RL	mg/kg	RL	mg/kg	RL
Chloride		7070 D	100	957	10.0	<10.0	10.0	24.4	10.0	55.2	10.0	46.5	10.0

This analytical report, and the entire data package it represents, has been made for your exclusive and confidential use. The interpretations and results expressed throughout this analytical report represent the best judgment of XENCO Laboratories. XENCO Laboratories assumes no responsibility and makes no warranty to the end use of the data hereby presented. Our liability is limited to the amount invoiced for this work order unless otherwise agreed to in writing.

Houston - Dallas - San Antonio - Atlanta - Tampa - Boca Raton - Latin America - Odessa - Corpus Christi

Kelsey Brooks
Project Manager



COG Operating LLC, Artesia, NM

**Project Name: State GC #3** 



**Project Id:** 

Contact: Dakota Neel

**Project Location:** 

**Date Received in Lab:** Sat Mar-25-17 10:30 am

**Report Date:** 06-APR-17 **Project Manager:** Kelsey Brooks

	Lab Id:	549471-0	07	549471-0	08	549471-0	09	549471-0	10	549471-03	11	549471-0	12
Analysis Requested	Field Id:	T1 - 8'		T1 - 10	'	T1 - 12	,	T1 - 14'		T2 - Surfa	ce	T2 - 1'	
Anatysis Requestea	Depth:	8 ft		10 ft		12 ft		14 ft				1 ft	
	Matrix:	SOIL		SOIL		SOIL		SOIL		SOIL		SOIL	
	Sampled:	Mar-16-17 1	12:53	Mar-16-17 1	2:57	Mar-16-17 1	3:00	Mar-16-17 1	3:05	Mar-16-17 1	3:20	Mar-16-17 1	13:25
Inorganic Anions by EPA 300/300.1	Extracted:	Apr-03-17 1	17:00	Apr-03-17 1	7:00								
SUB: TX104704215	Analyzed:	Apr-04-17 (	)4:42	Apr-04-17 0	2:50	Apr-04-17 0	3:18	Apr-04-17 0	3:27	Apr-04-17 0	3:36	Apr-04-17 0	04:51
	Units/RL:	mg/kg	RL	mg/kg	RL	mg/kg	RL	mg/kg	RL	mg/kg	RL	mg/kg	RL
Chloride		127	10.0	329	10.0	120	10.0	66.7	10.0	5920 D	100	997	10.0

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Kelsey Brooks Project Manager

Knis Roah



COG Operating LLC, Artesia, NM

**Project Name: State GC #3** 



**Project Id:** 

Contact: Dakota Neel

**Project Location:** 

**Date Received in Lab:** Sat Mar-25-17 10:30 am

**Report Date:** 06-APR-17 **Project Manager:** Kelsey Brooks

	Lab Id:	549471-0	13	549471-0	14	549471-0	15	549471-0	16	549471-0	17	549471-0	018
Analysis Requested	Field Id:	T2 - 2'		T2 - 3'		T2 - 4'		T2 - 6'		T2 - 8'		T2 - 10	,
Anaiysis Requesieu	Depth:	2 ft		3 ft		4 ft		6 ft		8 ft		10 ft	
	Matrix:	SOIL		SOIL		SOIL		SOIL		SOIL		SOIL	
	Sampled:	Mar-16-17	13:30	Mar-16-17 1	3:33	Mar-16-17 1	3:37	Mar-16-17 1	3:42	Mar-16-17	13:48	Mar-16-17	13:55
Inorganic Anions by EPA 300/300.1	Extracted:	Apr-03-17	17:00	Apr-03-17 1	7:00	Apr-03-17 1	7:00	Apr-03-17 1	7:00	Apr-03-17	7:00	Apr-03-17 1	17:00
SUB: TX104704215	Analyzed:	Apr-04-17 (	05:01	Apr-04-17 0	5:29	Apr-04-17 0	5:38	Apr-04-17 0	6:06	Apr-04-17 (	06:15	Apr-04-17 (	06:25
	Units/RL:	mg/kg	RL	mg/kg	RL	mg/kg	RL	mg/kg	RL	mg/kg	RL	mg/kg	RL
Chloride		126	10.0	46.6	10.0	35.4	10.0	12.7	10.0	17.4	10.0	53.2	10.0

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Kelsey Brooks Project Manager

Knis Roah



COG Operating LLC, Artesia, NM Project Name: State GC #3



**Project Id:** 

Contact: Dakota Neel

**Project Location:** 

Date Received in Lab: Sat Mar-25-17 10:30 am

**Report Date:** 06-APR-17 **Project Manager:** Kelsey Brooks

	Lab Id:	549471-0	19	549471-0	20		
4.1.0	Field Id:	T2 - 12	,	T2 - 14			
Analysis Requested	Depth:	12 ft		14 ft			
	Matrix:	SOIL		SOIL			
	Sampled:	Mar-16-17 1	4:00	Mar-16-17	14:05		
Inorganic Anions by EPA 300/300.1	Extracted:	Apr-03-17 1	7:00	Apr-03-17	7:00		
SUB: TX104704215	Analyzed:	Apr-04-17 (	06:34	Apr-04-17 (	06:43		
	Units/RL:	mg/kg	RL	mg/kg	RL		
Chloride		75.0	10.0	196	10.0		

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Houston - Dallas - San Antonio - Atlanta - Tampa - Boca Raton - Latin America - Odessa - Corpus Christi

Kelsey Brooks Project Manager

Knis Roah

# **Analytical Report 549471**

# for COG Operating LLC

Project Manager: Dakota Neel State GC #3

06-APR-17

Collected By: Dakota Neel





#### 1211 W. Florida Ave, Midland TX 79701

Xenco-Houston (EPA Lab code: TX00122): Texas (T104704215), Arizona (AZ0765), Florida (E871002), Louisiana (03054) Oklahoma (9218)

Xenco-Dallas (EPA Lab code: TX01468): Texas (T104704295) Xenco-Odessa (EPA Lab code: TX00158): Texas (T104704400)

Xenco-San Antonio: Texas (T104704534)

Xenco Phoenix (EPA Lab Code: AZ00901): Arizona(AZ0757) Xenco-Phoenix Mobile (EPA Lab code: AZ00901): Arizona (AZM757)





06-APR-17

Project Manager: Dakota Neel

COG Operating LLC 2407 Pecos Avenue Artesia, NM 88210

Reference: XENCO Report No(s): 549471

State GC #3
Project Address:

#### Dakota Neel:

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the XENCO Report Number(s) 549471. All results being reported under this Report Number apply to the samples analyzed and properly identified with a Laboratory ID number. Subcontracted analyses are identified in this report with either the NELAC certification number of the subcontract lab in the analyst ID field, or the complete subcontracted report attached to this report.

Unless otherwise noted in a Case Narrative, all data reported in this Analytical Report are in compliance with NELAC standards. The uncertainty of measurement associated with the results of analysis reported is available upon request. Should insufficient sample be provided to the laboratory to meet the method and NELAC Matrix Duplicate and Matrix Spike requirements, then the data will be analyzed, evaluated and reported using all other available quality control measures.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by XENCO Laboratories. This report will be filed for at least 5 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in Report No. 549471 will be filed for 60 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting XENCO Laboratories to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

Kelsey Brooks

Knus Hoah

Project Manager

Recipient of the Prestigious Small Business Administration Award of Excellence in 1994.

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# **Sample Cross Reference 549471**



# COG Operating LLC, Artesia, NM

State GC #3

Sample Id	Matrix	<b>Date Collected</b>	Sample Depth	Lab Sample Id
T1 - Surface	S	03-16-17 12:30	N/A	549471-001
T1 - 1'	S	03-16-17 12:31	- 1 ft	549471-002
T1 - 2'	S	03-16-17 12:35	- 2 ft	549471-003
T1 - 3'	S	03-16-17 12:40	- 3 ft	549471-004
T1 - 4'	S	03-16-17 12:45	- 4 ft	549471-005
T1 - 6'	S	03-16-17 12:50	- 6 ft	549471-006
T1 - 8'	S	03-16-17 12:53	- 8 ft	549471-007
T1 - 10'	S	03-16-17 12:57	- 10 ft	549471-008
T1 - 12'	S	03-16-17 13:00	- 12 ft	549471-009
T1 - 14'	S	03-16-17 13:05	- 14 ft	549471-010
T2 - Surface	S	03-16-17 13:20	N/A	549471-011
T2 - 1'	S	03-16-17 13:25	- 1 ft	549471-012
T2 - 2'	S	03-16-17 13:30	- 2 ft	549471-013
T2 - 3'	S	03-16-17 13:33	- 3 ft	549471-014
T2 - 4'	S	03-16-17 13:37	- 4 ft	549471-015
T2 - 6'	S	03-16-17 13:42	- 6 ft	549471-016
T2 - 8'	S	03-16-17 13:48	- 8 ft	549471-017
T2 - 10'	S	03-16-17 13:55	- 10 ft	549471-018
T2 - 12'	S	03-16-17 14:00	- 12 ft	549471-019
T2 - 14'	S	03-16-17 14:05	- 14 ft	549471-020



#### **CASE NARRATIVE**

Client Name: COG Operating LLC

Project Name: State GC #3

Project ID: Report Date: 06-APR-17 Work Order Number(s): 549471 Date Received: 03/25/2017

Sample receipt non conformances and comments:

please email results to:

rgrubbs@concho.com rhaskell@concho.com alieb@concho.com

Sample receipt non conformances and comments per sample:

None





#### COG Operating LLC, Artesia, NM

State GC #3

Sample Id: T1 - Surface Matrix: Soil Date Received:03.25.17 10.30

Lab Sample Id: 549471-001 Date Collected: 03.16.17 12.30

Analytical Method: Inorganic Anions by EPA 300/300.1 Prep Method: E300P

Tech: ALA % Moisture:

Analyst: ALA Date Prep: 04.03.17 18.00 Basis: Wet Weight

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	7070	100	mg/kg	04.05.17 16.34	D	10





#### COG Operating LLC, Artesia, NM

State GC #3

Sample Id: T1 - 1' Matrix: Soil Date Received:03.25.17 10.30

Lab Sample Id: 549471-002 Date Collected: 03.16.17 12.31 Sample Depth: 1 ft

Analytical Method: Inorganic Anions by EPA 300/300.1 Prep Method: E300P

Tech: ALA % Moisture:

Analyst: ALA Date Prep: 04.03.17 18.00 Basis: Wet Weight

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	957	10.0	mg/kg	04.04.17 01.54		1





#### COG Operating LLC, Artesia, NM

State GC #3

Sample Id: T1 - 2' Matrix: Soil Date Received:03.25.17 10.30

Lab Sample Id: 549471-003 Date Collected: 03.16.17 12.35 Sample Depth: 2 ft

Analytical Method: Inorganic Anions by EPA 300/300.1 Prep Method: E300P

Tech: ALA % Moisture:

Analyst: ALA Date Prep: 04.03.17 17.00 Basis: Wet Weight

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	<10.0	10.0	mg/kg	04.04.17 03.46	U	1





#### COG Operating LLC, Artesia, NM

State GC #3

Sample Id: T1 - 3' Matrix: Soil Date Received:03.25.17 10.30

Lab Sample Id: 549471-004 Date Collected: 03.16.17 12.40 Sample Depth: 3 ft

Analytical Method: Inorganic Anions by EPA 300/300.1 Prep Method: E300P

Tech: ALA % Moisture:

Analyst: ALA Date Prep: 04.03.17 17.00 Basis: Wet Weight

Seq Number: 3014044 SUB: TX104704215

 Parameter
 Cas Number
 Result
 RL
 Units
 Analysis Date
 Flag
 Dil

 Chloride
 16887-00-6
 24.4
 10.0
 mg/kg
 04.04.17 04.14
 1





#### COG Operating LLC, Artesia, NM

State GC #3

Sample Id: T1 - 4' Matrix: Soil Date Received:03.25.17 10.30

Lab Sample Id: 549471-005 Date Collected: 03.16.17 12.45 Sample Depth: 4 ft

Analytical Method: Inorganic Anions by EPA 300/300.1 Prep Method: E300P

Tech: ALA % Moisture:

Analyst: ALA Date Prep: 04.03.17 17.00 Basis: Wet Weight

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	55.2	10.0	mg/kg	04.04.17 04.23		1





#### COG Operating LLC, Artesia, NM

State GC #3

Sample Id: T1 - 6' Matrix: Soil Date Received:03.25.17 10.30

Lab Sample Id: 549471-006 Date Collected: 03.16.17 12.50 Sample Depth: 6 ft

Analytical Method: Inorganic Anions by EPA 300/300.1 Prep Method: E300P

Tech: ALA % Moisture:

Analyst: ALA Date Prep: 04.03.17 17.00 Basis: Wet Weight

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	46.5	10.0	mg/kg	04.04.17 04.33		1





#### COG Operating LLC, Artesia, NM

State GC #3

Sample Id: T1 - 8' Matrix: Soil Date Received:03.25.17 10.30

Lab Sample Id: 549471-007 Date Collected: 03.16.17 12.53 Sample Depth: 8 ft

Analytical Method: Inorganic Anions by EPA 300/300.1 Prep Method: E300P

Tech: ALA % Moisture:

Analyst: ALA Date Prep: 04.03.17 17.00 Basis: Wet Weight

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil	
Chloride	16887-00-6	127	10.0	mg/kg	04.04.17 04.42		1	-





#### COG Operating LLC, Artesia, NM

State GC #3

Sample Id: T1 - 10' Matrix: Soil Date Received:03.25.17 10.30

Lab Sample Id: 549471-008 Date Collected: 03.16.17 12.57 Sample Depth: 10 ft

Analytical Method: Inorganic Anions by EPA 300/300.1 Prep Method: E300P

Tech: ALA % Moisture:

Analyst: ALA Date Prep: 04.03.17 17.00 Basis: Wet Weight

Seq Number: 3014044 SUB: TX104704215

 Parameter
 Cas Number
 Result
 RL
 Units
 Analysis Date
 Flag
 Dil

 Chloride
 16887-00-6
 329
 10.0
 mg/kg
 04.04.17 02.50
 1





#### COG Operating LLC, Artesia, NM

State GC #3

Sample Id: T1 - 12' Matrix: Soil Date Received:03.25.17 10.30

Lab Sample Id: 549471-009 Date Collected: 03.16.17 13.00 Sample Depth: 12 ft

Analytical Method: Inorganic Anions by EPA 300/300.1 Prep Method: E300P

Tech: ALA % Moisture:

Analyst: ALA Date Prep: 04.03.17 17.00 Basis: Wet Weight

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	120	10.0	mg/kg	04.04.17 03.18		1





#### COG Operating LLC, Artesia, NM

State GC #3

Sample Id: T1 - 14' Matrix: Soil Date Received:03.25.17 10.30

Lab Sample Id: 549471-010 Date Collected: 03.16.17 13.05 Sample Depth: 14 ft

Analytical Method: Inorganic Anions by EPA 300/300.1 Prep Method: E300P

Tech: ALA % Moisture:

Analyst: ALA Date Prep: 04.03.17 17.00 Basis: Wet Weight

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil	
Chloride	16887-00-6	66.7	10.0	mg/kg	04.04.17 03.27		1	_





#### COG Operating LLC, Artesia, NM

State GC #3

Sample Id: T2 - Surface Matrix: Soil Date Received:03.25.17 10.30

Lab Sample Id: 549471-011 Date Collected: 03.16.17 13.20

Analytical Method: Inorganic Anions by EPA 300/300.1 Prep Method: E300P

Tech: ALA % Moisture:

Analyst: ALA Date Prep: 04.03.17 17.00 Basis: Wet Weight

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	5920	100	mg/kg	04.05.17 16.42	D	10





#### COG Operating LLC, Artesia, NM

State GC #3

Sample Id: T2 - 1' Matrix: Soil Date Received:03.25.17 10.30

Lab Sample Id: 549471-012 Date Collected: 03.16.17 13.25 Sample Depth: 1 ft

Analytical Method: Inorganic Anions by EPA 300/300.1 Prep Method: E300P

Tech: ALA % Moisture:

Analyst: ALA Date Prep: 04.03.17 17.00 Basis: Wet Weight

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	997	10.0	mg/kg	04.04.17 04.51		1





#### COG Operating LLC, Artesia, NM

State GC #3

Sample Id: T2 - 2' Matrix: Soil Date Received:03.25.17 10.30

Lab Sample Id: 549471-013 Date Collected: 03.16.17 13.30 Sample Depth: 2 ft

Analytical Method: Inorganic Anions by EPA 300/300.1 Prep Method: E300P

Tech: ALA % Moisture:

Analyst: ALA Date Prep: 04.03.17 17.00 Basis: Wet Weight

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	126	10.0	mg/kg	04.04.17 05.01		1





#### COG Operating LLC, Artesia, NM

State GC #3

Sample Id: T2 - 3' Matrix: Soil Date Received:03.25.17 10.30

Lab Sample Id: 549471-014 Date Collected: 03.16.17 13.33 Sample Depth: 3 ft

Analytical Method: Inorganic Anions by EPA 300/300.1 Prep Method: E300P

Tech: ALA % Moisture:

Analyst: ALA Date Prep: 04.03.17 17.00 Basis: Wet Weight

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	46.6	10.0	mg/kg	04.04.17 05.29		1





#### COG Operating LLC, Artesia, NM

State GC #3

Sample Id: T2 - 4' Matrix: Soil Date Received:03.25.17 10.30

Lab Sample Id: 549471-015 Date Collected: 03.16.17 13.37 Sample Depth: 4 ft

Analytical Method: Inorganic Anions by EPA 300/300.1 Prep Method: E300P

Tech: ALA % Moisture:

Analyst: ALA Date Prep: 04.03.17 17.00 Basis: Wet Weight

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	35.4	10.0	mg/kg	04.04.17 05.38		1





#### COG Operating LLC, Artesia, NM

State GC #3

Sample Id: T2 - 6' Matrix: Soil Date Received:03.25.17 10.30

Lab Sample Id: 549471-016 Date Collected: 03.16.17 13.42 Sample Depth: 6 ft

Analytical Method: Inorganic Anions by EPA 300/300.1 Prep Method: E300P

Tech: ALA % Moisture:

Analyst: ALA Date Prep: 04.03.17 17.00 Basis: Wet Weight

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	12.7	10.0	mg/kg	04.04.17 06.06		1





#### COG Operating LLC, Artesia, NM

State GC #3

Sample Id: T2 - 8' Matrix: Soil Date Received:03.25.17 10.30

Lab Sample Id: 549471-017 Date Collected: 03.16.17 13.48 Sample Depth: 8 ft

Analytical Method: Inorganic Anions by EPA 300/300.1 Prep Method: E300P

Tech: ALA % Moisture:

Analyst: ALA Date Prep: 04.03.17 17.00 Basis: Wet Weight

Seq Number: 3014044 SUB: TX104704215

 Parameter
 Cas Number
 Result
 RL
 Units
 Analysis Date
 Flag
 Dil

 Chloride
 16887-00-6
 17.4
 10.0
 mg/kg
 04.04.17 06.15
 1





#### COG Operating LLC, Artesia, NM

State GC #3

Sample Id: T2 - 10' Matrix: Soil Date Received:03.25.17 10.30

Lab Sample Id: 549471-018 Date Collected: 03.16.17 13.55 Sample Depth: 10 ft

Analytical Method: Inorganic Anions by EPA 300/300.1 Prep Method: E300P

Tech: ALA % Moisture:

Analyst: ALA Date Prep: 04.03.17 17.00 Basis: Wet Weight

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil	
Chloride	16887-00-6	53.2	10.0	mg/kg	04.04.17 06.25		1	





#### COG Operating LLC, Artesia, NM

State GC #3

Sample Id: T2 - 12' Matrix: Soil Date Received:03.25.17 10.30

Lab Sample Id: 549471-019 Date Collected: 03.16.17 14.00 Sample Depth: 12 ft

Analytical Method: Inorganic Anions by EPA 300/300.1 Prep Method: E300P

Tech: ALA % Moisture:

Analyst: ALA Date Prep: 04.03.17 17.00 Basis: Wet Weight

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil	
Chloride	16887-00-6	75.0	10.0	mg/kg	04.04.17 06.34		1	





#### COG Operating LLC, Artesia, NM

State GC #3

Sample Id: T2 - 14' Matrix: Soil Date Received:03.25.17 10.30

Lab Sample Id: 549471-020 Date Collected: 03.16.17 14.05 Sample Depth: 14 ft

Analytical Method: Inorganic Anions by EPA 300/300.1 Prep Method: E300P

Tech: ALA % Moisture:

Analyst: ALA Date Prep: 04.03.17 17.00 Basis: Wet Weight

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil	
Chloride	16887-00-6	196	10.0	mg/kg	04.04.17 06.43		1	_



#### **Flagging Criteria**



- X In our quality control review of the data a QC deficiency was observed and flagged as noted. MS/MSD recoveries were found to be outside of the laboratory control limits due to possible matrix /chemical interference, or a concentration of target analyte high enough to affect the recovery of the spike concentration. This condition could also affect the relative percent difference in the MS/MSD.
- **B** A target analyte or common laboratory contaminant was identified in the method blank. Its presence indicates possible field or laboratory contamination.
- **D** The sample(s) were diluted due to targets detected over the highest point of the calibration curve, or due to matrix interference. Dilution factors are included in the final results. The result is from a diluted sample.
- E The data exceeds the upper calibration limit; therefore, the concentration is reported as estimated.
- F RPD exceeded lab control limits.
- J The target analyte was positively identified below the quantitation limit and above the detection limit.
- U Analyte was not detected.
- L The LCS data for this analytical batch was reported below the laboratory control limits for this analyte. The department supervisor and QA Director reviewed data. The samples were either reanalyzed or flagged as estimated concentrations.
- **H** The LCS data for this analytical batch was reported above the laboratory control limits. Supporting QC Data were reviewed by the Department Supervisor and QA Director. Data were determined to be valid for reporting.
- **K** Sample analyzed outside of recommended hold time.
- **JN** A combination of the "N" and the "J" qualifier. The analysis indicates that the analyte is "tentatively identified" and the associated numerical value may not be consistent with the amount actually present in the environmental sample.
- \*\* Surrogate recovered outside laboratory control limit.
- BRL Below Reporting Limit.
- **RL** Reporting Limit

MDL Method Detection Limit SDL Sample Detection Limit LOD Limit of Detection

PQL Practical Quantitation Limit MQL Method Quantitation Limit LOQ Limit of Quantitation

**DL** Method Detection Limit

NC Non-Calculable

- + NELAC certification not offered for this compound.
- \* (Next to analyte name or method description) = Outside XENCO's scope of NELAC accreditation

#### Recipient of the Prestigious Small Business Administration Award of Excellence in 1994.

Certified and approved by numerous States and Agencies.

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5332 Blackberry Drive, San Antonio TX 78238 (210) 509-3334 (210) 509-3335
1211 W Florida Ave, Midland, TX 79701 (432) 563-1800 (432) 563-1713
2525 W. Huntington Dr. - Suite 102, Tempe AZ 85282 (602) 437-0330

**Parameter** 

#### **QC Summary** 549471

#### **COG Operating LLC**

State GC #3

Limits

E300P Analytical Method: Inorganic Anions by EPA 300/300.1 Prep Method: Seq Number: 3014044 Matrix: Solid Date Prep: 04.03.17 LCSD Sample Id: 722517-1-BSD

LCS

%Rec

LCS Sample Id: 722517-1-BKS MB Sample Id: 722517-1-BLK

Spike

Amount

LCS

Result

%RPD **RPD** Units Analysis Flag Limit Date

E300P

E300P

Prep Method:

Prep Method:

04.04.17 02:31 Chloride < 2.00 20.0 19.7 99 20.0 100 80-120 2 20 mg/kg

Analytical Method: Inorganic Anions by EPA 300/300.1 Seq Number:

MB

Result

E300P Prep Method: 3014002 Matrix: Solid Date Prep: 04.03.17

LCSD

Result

LCSD

%Rec

MB Sample Id: 722515-1-BLK LCS Sample Id: 722515-1-BKS LCSD Sample Id: 722515-1-BSD

LCS LCS %RPD RPD MB Spike LCSD LCSD Limits Units Analysis Flag **Parameter** Result Result %Rec Limit Date Amount Result %Rec Chloride < 2.00 20.0 20.2 101 19.8 99 80-120 2 20 mg/kg 04.03.17 21:23

Analytical Method: Inorganic Anions by EPA 300/300.1 Prep Method: E300P Seq Number: 3014044 Matrix: Soil 04.03.17 Date Prep:

MSD Sample Id: 549471-008 SD MS Sample Id: 549471-008 S Parent Sample Id: 549471-008

MS MSD RPD Parent Spike MS **MSD** Limits %RPD Units Analysis Flag **Parameter** Result Limit Date Result %Rec Amount Result %Rec

04.04.17 02:59 Chloride 329 100 425 96 424 95 80-120 0 20 mg/kg

Analytical Method: Inorganic Anions by EPA 300/300.1

Seq Number: 3014044 Matrix: Soil Date Prep: 04.03.17

MS Sample Id: 549471-013 S MSD Sample Id: 549471-013 SD Parent Sample Id: 549471-013

RPD MS MSD %RPD Parent Spike MS Limits Units Analysis **MSD** Flag **Parameter** Result Limit Result Amount %Rec Date Result %Rec Chloride 102 0 20 04.04.17 05:10 126 100 228 227 101 80-120 mg/kg

Analytical Method: Inorganic Anions by EPA 300/300.1

Prep Method: E300P 3014002 Matrix: Solid Seq Number: Date Prep: 04.03.17

MS Sample Id: 549470-012 S Parent Sample Id: 549470-012 MSD Sample Id: 549470-012 SD

Parent Spike MS MS Limits %RPD **RPD** Units Analysis **MSD MSD** Flag **Parameter** Result Limit Date Result Amount %Rec Result %Rec X

Chloride 8090 100 7970 n 7980 n 80-120 0 20 04.03.17 22:09 mg/kg

Analytical Method: Inorganic Anions by EPA 300/300.1

Seq Number: 3014002 Matrix: Solid Date Prep: 04.03.17

MS Sample Id: 549470-020 S MSD Sample Id: 549470-020 SD Parent Sample Id: 549470-020

Parent Spike MS MS Limits %RPD **RPD** Units Analysis MSD MSD Flag **Parameter** Result %Rec Limit Date Result Amount Result %Rec 100 148 104 20 04.04.17 00:20 Chloride 43.6 147 103 80-120 1 mg/kg



# CHAIN OF CUSTODY

	IR ID B	Temp: 1. 0	Received By:	Date Time: Rec	Day	2 Relinquished By: 4	5/74/17 2 4	Mr. A	1 g, Dm. Received By:	Time:	Date Time:	1 NAKOTA NEEL. Relinquished by:	ω
		722	Received By:	Date Time: (O.)) Rec	_	SAMPLE CUSTODY MUST BE DOCUMENTED BELOW EACH TIME SAMPLES CHANGE POSSESSION, INCLUDING COURIER DELIVERY    Date Time:   Received By:   /(CD     Relinquished By:	LES CHANGE POSSESS	TIME SAMP	Received By:	ie:	Date Time:	Relinquished by Sampler:	
			Tracking #	FED-EX / UPS: Tracking #							00 pm	TAT Starts Day received by Lab, if received by 5:00 pm	Т
								TRRP Checklist	TRRP			3 Day EMERGENCY	
						UST / RG -411		Level 3 (CLP Forms)	Level			2 Day EMERGENCY Contract TAT	
						TRRP Level IV		Level III Std QC+ Forms	Level			Next Day EMERGENCY	
					raw data)	Level IV (Full Data Pkg /ra		Level II Std QC	Level			Same Day TAT 5 Day TAT	_
				Notes:			Data Deliverable Information	Data Deli				Turnaround Time ( Business days)	
						-		1	1:050	-	2	10 11 - 14	_
_					2			_	1:00 PM		12	9 11- 12	,
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						7		<b>い</b>	12:30/4	3/16/17	1	1 TI- SURFACE	
	ents	Field Comments			- M	NaOH NaHSO4 MEOH NONE	HCI NaOH/Zn Acetate HNO3 H2SO4	# of bottles	Time	Date	Sample Depth	No. Field ID / Point of Collection	Z
		A = Air			10	Number of preserved bottles	Number of pre		ם	Collection		Gallipie a a Ivalie: Pau VII Elov	Gall
	WW= Waste Water	WW= Wa			-1	o:			ה	PO Number:		amplers's Name Agron I joh	2
	Je	0 = 0il			0			9701				Project Contact: Aaron Lieb	Pro
Fin	SW = Sundge SL = Sludge OW =Ocean/Sea Water	SW = Strade SL = Sludge OW = Ocean						ng LLC //cneill s	COG Operating LLC Attn: Robert Mcneill 600 W. Illinois	Invoice To:	.1553	Email: Phone No: 575.748-1553 alieb@concho.com dneel2@concho.com rhaskell@concho.com	Ema
al 1.0	DW = Drinking Water P = Product	DW = Drinkir P = Product							ty,NM	Eddy County,NM		Company Address: 2407 PECOS Avenue Artesia NM 88210	Con
00	S = Soil/Sed/Solid	S = Soil/s							#3	Project Name/Number: State GQ #3		COG Operating LLC	COn
	<b>*</b>	W = Water						Project Information	Project Ir			Client / Reporting Information	
	Codes	Matrix Codes		Analytical Information	Ar								
		1771	Xenco Job # 5 49	Xenco	Xenco Quote #	Xenc	co.com	www.xenco.com					
								-5251)	Midland, Texas (432-704-5251)	Midland,		Dallas Texas (214-902-0300)	_
				Phoenix, Arizona (480-355-0900)	enix, Arizon	Pho		-509-3334)	San Antonio, Texas (210-509-3334)	San Anto		Stafford, Texas (281-240-4200)	"

Notice: Signature of this document and relinquishment of samples constitutes a valid purchase order from client company to Xenco, its affiliates and subconfractors. It assigns standard terms and conditions of service. Xenco will be liable only for the cost of samples and shall not analyzed will be invoiced at \$5 per sample. He cost of samples are due to circumstances beyond the control of Xenco. A minimum charge of \$75 will be applied to each project. Xenco's liablifty will be limited to the cost of samples. Any samples received by Xenco but not analyzed will be invoiced at \$5 per sample.

Relinquished by:

Date Time:

Received By:

iny |



# CHAIN OF CUSTODY

Dallas Texas (214-902-0300) Stafford, Texas (281-240-4200) Setting the Standard since 1990

Company Name / Branch: COG Operating LLC Company Address: Samplers's Name- Aaron Lieb Project Contact: Aaron Lieb 3 Day EMERGENCY Next Day EMERGENCY Same Day TAT Relinquished by: Relinquished by Sampler 2 Day EMERGENCY 2407 PECOS Avenue alieb@concho.com Client / Reporting Information TAT Starts Day received by Lab, if received by 5:00 pm VYOTA VEC Turnaround Time (Business days) ١ 1 1 1 -١ 1 Field ID / Point of Collection SURFACC Artesia NM 88210 dneel2@concho.com rhaskell@concho.com 5 1 7 Contract TAT 7 Day TAT 5 Day TAT Phone No: 575-748-1553 SAMPLE CUSTODY MUST BE DOCUMENTED BELOW EACH TIME SAMPLES CHANGE POSSESSION, INCLUDING COURIER DELIVERY Date Time: 3/24/17 11:00 I رل 9 00 7 0 0 1 3/16/17 Midland, Texas (432-704-5251) San Antonio, Texas (210-509-3334) Invoice To: COG Operating LLC Project Location: Project Name/Number: PO Number Eddy County,NM State GQ #3 Collection 2:00 Pm 2:05m 1:48 Pm 1: 20 Pm :37 Pm 1:33 Pm 1:30 Pm 1,552 1742 Pm 1:25Pm Attn: Robert Mcneill 600 W. Illinois Received By: Midland TX 79701 Received By: Time Project Information Level 3 (CLP Forms) Level III Std QC+ Forms Level II Std QC TRRP Checklist Matrix S www.xenco.com Data Deliverable Information # of bottles 200 HCI 3/24/17 NaOH/Zn Number of preserved bottles Acetate HNO3 Relinquished By: H2SO4 Relinquished By: UST / RG -411 TRRP Level IV Level IV (Full Data Pkg /raw data) NaOH NaHSO4 МЕОН IONE Phoenix, Arizona (480-355-0900) Xenco Quote # chloride 7 Date Time: Date Time: Analytical Information FED-EX / UPS: Tracking # 00 Notes: Xenco Job # Received By: Received By: Field Comments P = Product DW = Drinking Water GW =Ground Water S = Soil/Sed/SolidW = Water O = Oil WW= Waste Water WI = Wipe SL = Sludge SW = Surface water OW =Ocean/Sea Water Matrix Codes Page 32 of 33 Final 1.000

<u>N</u>0

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Notice: Notice: Signature of this document and relinquishment of samples constitutes a valid purchase order from client company to Xenco, its affiliates and subcontractors. It assigns standard terms and conditions of service. Xenco will be liable only for the color of samples and shall not assume any responsibility for any contract of samples in the Client if such loses are due to circumstances beyond the control of Xenco. A minimum charge of \$75 will be applied to each project. Xenco's liability will be limited to the cost of samples. Any samples received by Xenco but not analyzed will be invoiced at \$5 per sample. These terms will be applied to each project. Xenco's liability will be limited to the cost of samples. Any samples received by Xenco but not analyzed will be invoiced at \$5 per sample. These terms will be applied to each project. Xenco's liability will be limited to the cost of samples. Any samples received by Xenco but not analyzed will be invoiced at \$5 per sample. These terms will be applied to each project. Xenco's liability will be limited to the cost of samples. Any samples received by Xenco but not analyzed will be invoiced at \$5 per sample. These terms will be applied to each project. Xenco's liability will be limited to the cost of samples. Any samples received by Xenco but not analyzed will be invoiced at \$5 per sample. will be enforced unless previously negotiated under a fully executed client contract. Corrected Temp:

Relinquished by:

Date Time:

Received By:

Custody Seal #

Preserved where applicable

On Ice

CF: +0.1 Temp:

IR ID:R-8



# **XENCO Laboratories** Prelogin/Nonconformance Report- Sample Log-In



Client: COG Operating LLC

Date/ Time Received: 03/25/2017 10:30:00 AM

Acceptable Temperature Range: 0 - 6 degC Air and Metal samples Acceptable Range: Ambient

Work Order #: 549471

Temperature Measuring device used: R8

	Sample Receipt Checklist	Comments						
#1 *Temperature of cooler(s)?		1.9						
#2 *Shipping container in good condition	?	Yes						
#3 *Samples received on ice?		Yes						
#4 *Custody Seal present on shipping co	ontainer/ cooler?	N/A						
#5 *Custody Seals intact on shipping cor	ntainer/ cooler?	N/A						
#6 Custody Seals intact on sample bottle	es?	N/A						
#7 *Custody Seals Signed and dated?		N/A						
#8 *Chain of Custody present?		Yes						
#9 Sample instructions complete on Cha	in of Custody?	Yes						
#10 Any missing/extra samples?		No						
#11 Chain of Custody signed when reline	quished/ received?	Yes						
#12 Chain of Custody agrees with sample	e label(s)?	Yes						
#13 Container label(s) legible and intact	?	Yes						
#14 Sample matrix/ properties agree with	n Chain of Custody?	Yes						
#15 Samples in proper container/ bottle?	•	Yes						
#16 Samples properly preserved?		Yes						
#17 Sample container(s) intact?		Yes						
#18 Sufficient sample amount for indicat	ed test(s)?	Yes						
#19 All samples received within hold time	e?	Yes						
#20 Subcontract of sample(s)?		N/A						
#21 VOC samples have zero headspace	?	N/A						
#22 <2 for all samples preserved with HI samples for the analysis of HEM or HEM-analysts.		N/A						
#23 >10 for all samples preserved with N	laAsO2+NaOH, ZnAc+NaOH?	N/A						
* Must be completed for after-hours delivery of samples prior to placing in the refrigerator  Analyst: PH Device/Lot#:								
Checklist completed by:	Jessica Kramer	Date: 03/27/2017						
Checklist reviewed by:	Kelsey Brooks	Date: 03/27/2017						

#### **NM OIL CONSERVATION**

District I 1625 N. French Dr., Hobbs, NM 88240 District II
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** 

ARTESIA DISTRICT

Form C-141 Revised August 8, 2011

Oil Conservation Division

1220 South St. Francis Dr. Santa Fe, NM 87505

MAR 0 7 2017 Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC. RECEIVED

Release Notification and Corrective Action									
					<b>OPERA</b>	TOR	٥	Initia	l Report
Address:									
Facility Nan	ne:	STATE G	Q COM	¥003Н	Facility Ty	pe:	Tanl	c Battery	
Surface Ow	ner:	State		Mineral Owner				API No.	30-015-40867
				LOCATIO	N OF RE	LEASE			
Unit Letter	Section	Township	Range			Feet from the	East/We	st Line	County
A	07	25\$	28E	330'	North	380,	Ea	st	Eddy
				Latitude 32.1509857	Longi	t <b>ude 104</b> .11 <b>95</b> 90	8		
	OPERATOR								
Type of Relea	ase:	Produced	Water		Volume o			Volume	
Source of Re	lease:	3''Steel	T ina					Date an	
Was Immedia	ate Notice (		Line					L	03/03/17 3.10 pm
	OPERATOR  Initial Report  Final Report								
By Whom?									
Was a Water	course Read	_	Ves IV	l No	If YES, V	olume Impacting t	the Watero	course.	
If a Watercou	arse was Im	pacted, Descr	ibe Fully.						
Describe Cau	ise of Probl	em and Reme	dial Actio	n Taken.*					
A hole developed in the middle of a 3" steel line. Replace the steel joint with a new section of steel pipe.									
Describe Are	Latitude 32.1509857 Longitude 104.1195908  NATURE OF RELEASE    Freduced Water   Volume of Release: 20bbls   18bbls   18								
This release	Date and Hour of Occurrence: 03/03/17 3:10 pm    Yes   No   Not Required								
	This release was contained on the pad in front of the berm. An estimated area of 20'x 20'. 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.								
· · · · · · · · ·									
	cribe Area Affected and Cleanup Action Taken.*  s release was contained on the pad in front of the berm. An estimated area of 20'x 20'. Concho will have the spill site sampled to delineate any possible tamination from the release and we will present a remediation work plan to the NMOCD for approval prior to any significant remediation work.  reby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and plations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger lic 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 and their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other eral, state, or local laws and/or regulations.								
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									
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									
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									
OIL CONSERVATION DIVISION									
Signature:	•		-	_ 1		OIL CON	SERVA	LIUN	DIVISION
							/	^1. 0	4L()111001
Printed Name	e:	Rober	t Grubbs .	lr.	Approved b	y Environmental S	pecialist	<u>M</u> k	STRU MULLI
Title:	S	enior HSE Co	ordinator		Approval E	ate: 3/10/11	7   E	xpiration	Date: N/A
							<del> </del>	1	
					1 _		ach	ed	Attached

\* Attach Additional Sheets If Necessary

ARP-4139

#### Operator/Responsible Party,

The OCD has received the form C-141 you provided on 3/7/17 regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 2RP-4139 has been assigned. Please refer to this case number in all future correspondence.

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

The responsible person shall complete <u>division-approved corrective action</u> for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC. [emphasis added]

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District II office in Artesia on or before 4/14/17. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

- Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C<sub>6</sub> thru C<sub>36</sub>), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.
- Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C<sub>6</sub> thru C<sub>36</sub>), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.
- Nominal detection limits for field and laboratory analyses must be provided.
- Composite sampling is not generally allowed.
- Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

- •Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.
- If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.
- Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.

#### Jim Griswold

OCD Environmental Bureau Chief 1220 South St. Francis Drive Santa Fe, New Mexico 87505 505-476-3465 jim.griswold@state.nm.us

#### Weaver, Crystal, EMNRD

From:

Robert Grubbs < RGrubbs@concho.com>

Sent:

Tuesday, March 7, 2017 8:35 AM

To:

Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD; 'agroves@slo.state.nm.us'

Subject:

(C-141 Initial) STATE GQ COM #003H (TB) 30-015-40867

**Attachments:** 

State GQ Com #003H (TB) Initial.pdf

MR. BRATCHER / MS. GROVES,

ATTACHED IS A C-141 FOR YOUR CONSIDERATION. IF YOU HAVE ANY ADDITIONAL QUESTIONS PLEASE FEEL FREE TO CONTACT ME.

THANK YOU.

ROBERT GRUBBS JR.
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