



May 18, 2020

Oil Conservation Division, District 1
1625 N. French Dr.
Hobbs, NM

Re: Work Plan
Dodd Federal Unit #980H (3/23/19)
RP#: 2RP-5334
Incident #: NAB1909540096
GPS: 32.85542, -104.06603
Unit Letter C, Section 10, Township 17 South, Range 29 East
Eddy County, New Mexico

To Whom It May Concern,

COG Operating, LLC (COG) is pleased to submit the following work plan in response to a release that occurred at the Dodd Federal Unit #980H located in Unit Letter C, Section 10, Township 17 South and Range 29 East in Lea County, New Mexico.

BACKGROUND

The release was discovered on March 23, 2019 and a C-141 initial report was submitted and approved by the New Mexico Oil Conservation Division (NMOCD). The release was caused by a dump on the FWKO losing pressure, filling the vessel and sending fluid up to the flare. Approximately 1 barrels of oil and 5 barrels of produced water were released and recovered 0.5 barrels of crude oil and 3 barrels of water. The initial C-141 is shown in Appendix A.

GROUNDWATER AND REGULATORY

According to the New Mexico Office of the State Engineer (NMOSE), reported water wells are in Section 22, with groundwater depth of 76' below surface. The water well information is shown in Appendix B.

A risk based evaluation and site determinations were performed in accordance to the New Mexico Oil Conservation Division (NMOCD) Rule (Title 19 Chapter 15 Part 29) for releases on oil and gas development and production facilities in New Mexico (effective August 14, 2018). According to the site characterization evaluation, no other receptors (water wells, playas, water course, lake beds or ordinance boundaries) were located within each specific boundaries or distance from the site. However, the area is in a high Karst area. The groundwater data and the site characterization evaluation data is summarized in Appendix B. The delineation and closure criteria are listed below:

General Site Characterization and Groundwater:

Site Characterization	Average Groundwater Depth (ft.)
High Karst	>50 feet

Delineation and Closure Criteria:

Remedial Action Levels (RALs)	
Chlorides	600 mg/kg
TPH (GRO and DRO and MRO)	100 mg/kg
TPH (GRO and DRO)	-
Benzene	10 mg/kg
Total BTEX	50 mg/kg

SAMPLE RESULTS

After excavating the impacted area, a total of four (4) composite samples were collected from the area. Referring to Table 1, all of the samples were below the Table 1 Closure Criteria concentrations for TPH and BTEX. However, the areas of B-1 and B-2 exceeded the closure criteria concentrations for chlorides at 2.0' below surface, with chloride concentrations of 1,650 mg/kg and 2,800 mg/kg, respectively. These areas were not vertically defined. The areas of B-3 and B-4 were all below the Table 1 Closure Criteria concentrations for chlorides.

REMEDICATION PLAN

- The areas of B-1 and B-2 will be assessed to define the vertical extents. Due to size of area, a backhoe trench or a borehole will be placed in the center of B-1 and B-2.
- If the impact is shallow and does not appear to be a safety concern around the flare, the impacted material will be excavated to the appropriate depth.
- If deeper impact is encountered and the impacted soil cannot be excavated safely around the flare, the impacted area will be excavated to a depth of 3-4' below surface and capped with a 20-mil liner.

Liner Variance and Confirmation Sampling

If deeper impact is encountered and the impacted soil cannot be excavated safely around the flare, COG requests a variance to install a 20-mil liner at 3.0' - 4.0' below surface in the areas of B-1 and B-2 to prevent vertical migration of the deeper chloride concentrations detected (per rule 19.15.29.14). Prior to the liner installation, composite sidewall samples will be collected every 200 square feet, to be representative of the release area, for documentation purposes.

Once the excavation is complete, the areas will be backfilled with clean material to surface grade with clean material. The delineation and remediation to be implemented 90 days after the work plan is approved.

SITE RECLAMATION AND RESTORATION

All fluids remained on the pad and no reclamation at the site is required.

CLOSURE REPORT PREPARATION

Once the remediation activities are completed, COG will prepare a closure report for the site. Should you have any questions or concerns on the closure report, please do not hesitate to contact me.

Sincerely,
Concho Operating, LLC



Ike Tavaréz, P. G.
Senior HSE Supervisor
itavarez@concho.com

CC:

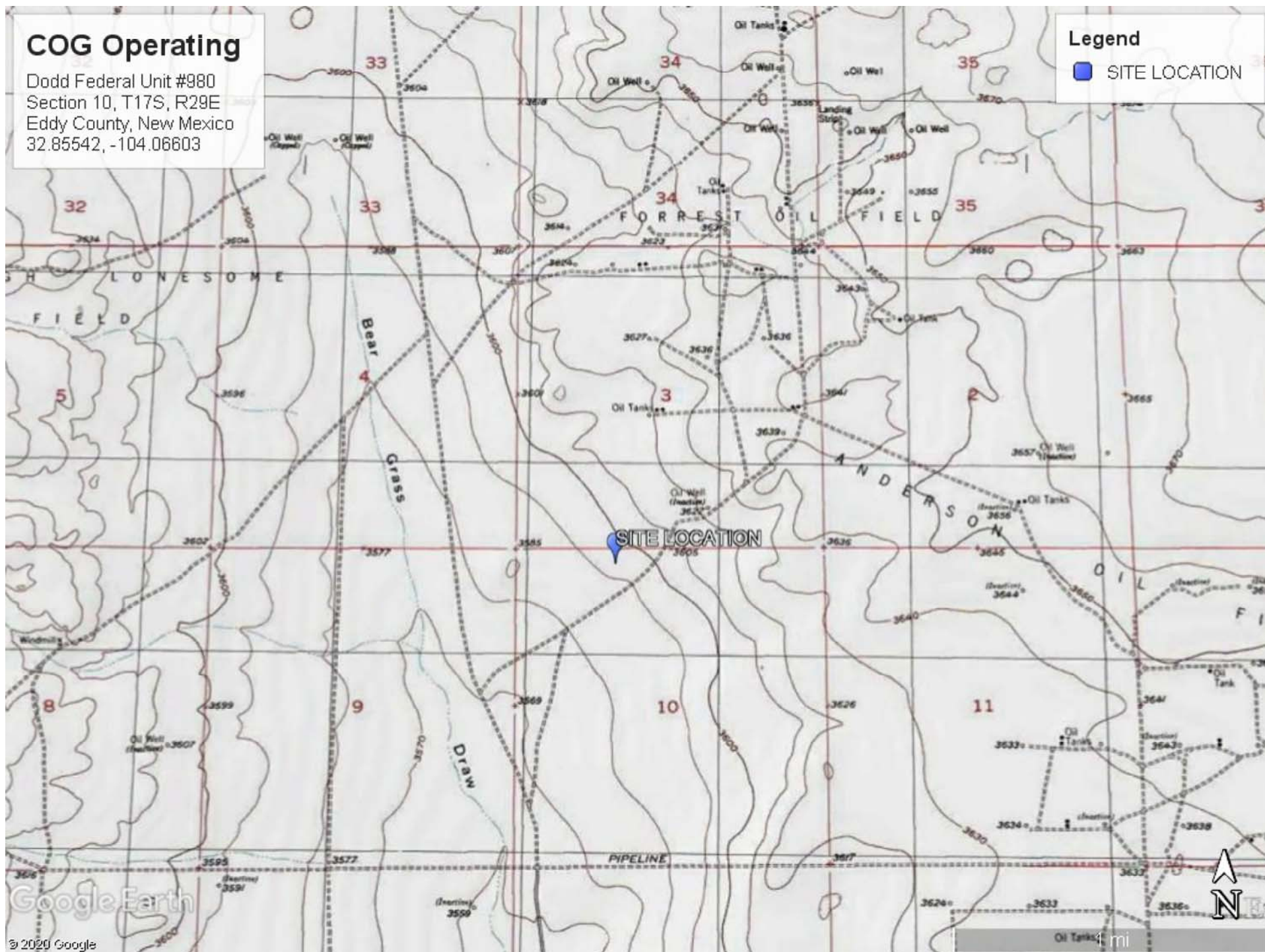
Figures

COG Operating

Dodd Federal Unit #980
Section 10, T17S, R29E
Eddy County, New Mexico
32.85542, -104.06603

Legend

 SITE LOCATION



Google Earth

© 2020 Google

COG Operating

Dodd Federal Unit #980
Section 10, T17S, R29E
Eddy County, New Mexico
32.85542, -104.06603

Legend

- ⊙ Bottom Samples
- Spill Area

Google Earth

90 ft



Tables

Table 1
COG Operating LLC
Dodd Federal Unit #980H
Eddy County, New Mexico

Sample ID	Sample Date	Sample Depth (ft)	Soil Status		TPH (mg/kg)				Benzene (mg/kg)	Total BTEX (mg/kg)	Chloride (mg/kg)
			In-Situ	Removed	GRO	DRO	MRO	Total			
NMOCD Remediation Action Limits (mg/kg)					-	-	-	100	10	50	600
Bottom -1	9/24/2019	2	X		<10.0	<10.0	<10.0	<10.0	<0.05	<0.05	1650
Bottom -2	9/24/2019	1	X		<10.0	<10.0	<10.0	<10.0	<0.05	<0.05	496
Bottom -3	9/24/2019	1	X		<10.0	<10.0	<10.0	<10.0	<0.05	<0.05	176
Bottom -4	9/24/2019	2	X		<10.0	<10.0	<10.0	<10.0	<0.05	<0.05	2800
North	9/24/2019	0-1	X		<10.0	<10.0	<10.0	<10.0	<0.05	<0.05	480
South	9/24/2019	0-1	X		<10.0	<10.0	<10.0	<10.0	<0.05	<0.05	320
East	9/24/2019	0-1	X		<10.0	<10.0	<10.0	<10.0	<0.05	<0.05	240
West	9/24/2019	0-1	X		<10.0	<10.0	<10.0	<10.0	<0.05	<0.05	192

(-) Not Analyzed

Define Areas and Remove Impact

Note: If deeper impact is encountered, COG will excavate to 4' below surface and install liner to cap the deeper impact.

Appendix A

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 Department

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party	OGRID
Contact Name	Contact Telephone
Contact email	Incident # (assigned by OCD)
Contact mailing address	

Location of Release Source

Latitude _____ Longitude _____
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	Site Type
Date Release Discovered	API# (if applicable)

Unit Letter	Section	Township	Range	County

Surface Owner: ☐ State ☐ Federal ☐ Tribal ☐ Private (Name: _____)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? <input type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?	

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

<input type="checkbox"/> The source of the release has been stopped.	
<input type="checkbox"/> The impacted area has been secured to protect human health and the environment.	
<input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.	
<input type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why:	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.	
Printed Name: _____	Title: _____
Signature: <u>Delann Opreant</u>	Date: _____
email: _____	Telephone: _____
<u>OCD Only</u>	
Received by: _____	Date: _____

Incident ID	
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	_____ (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did the release impact areas not on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

Characterization Report Checklist: *Each of the following items must be included in the report.*

- ☐ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☐ Field data
- ☐ Data table of soil contaminant concentration data
- ☐ Depth to water determination
- ☐ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- ☐ Boring or excavation logs
- ☐ Photographs including date and GIS information
- ☐ Topographic/Aerial maps
- ☐ Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

Oil Conservation Division

Incident ID	
District RP	2RP 5334
Facility ID	
Application ID	

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.

Printed Name: Ike Tavaréz Title: Senior HSE Supervisor

Signature: _____ Date: 5/18/20

email: itavarez@concho.com Telephone: 432-683-7443

OCD Only

Received by: _____ Date: _____

Incident ID	
District RP	
Facility ID	
Application ID	

Remediation Plan

Remediation Plan Checklist: *Each of the following items must be included in the plan.*

- ☐ Detailed description of proposed remediation technique
- ☐ Scaled sitemap with GPS coordinates showing delineation points
- ☐ Estimated volume of material to be remediated
- ☐ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☐ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- ☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- ☐ Extents of contamination must be fully delineated.
- ☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.

Printed Name: _____ Title: _____

Signature: AB _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: _____ Date: _____

Appendix B

Water Well Data
Average Depth to Groundwater (ft)
COG -Dodd Federal Unit #980H

16 South			28 East		
6	5	4	3	2	1
7	8	9	10	11	12
18	17	16	15	14	13
19	20	21	22	23	24
30	29	61	27	26	25
31	32	33	34	35	36

16 South			29 East		
6	5	4	3	2	1
7	8	9	10	11	12
18	17	16	15	14 220	13
19	20	21	22	23	24
110	30	29	28	27	26
31	32	33	34	35	36

16 South			30 East		
6	5	4	3	2	1
7	8	9	10	11	12
18	17	16	15	14	13
19	20	21	22	23	24
30	29	28	27	26	25
31	32	33	34	35	36

17 South			28 East		
6	5	4	3	2 28	1
7	8	9	10	11	12
18	17	16	15	14	13
19	20	21	22 45	23	24
224	30	29	79	27	26
31	32	33	34	35	36
	SITE			258	

17 South			29 East		
6	5	4	3	2	1
7	8	9	10	11	12
18	17	16	15	14	13
19	20	21	22 76	23	24
30	29 210	28	27	26	25
31	32	33	34	35	36
				153	

17 South			30 East		
6	5	4	3	2	1
7	8	9	10	11	12
18	17	16	15	14	13
19	20 80	21	22	23	24
30	29	28	27	26	25
31	32	33	34	35	36

18 South			28 East		
6	5	4	3	2 55	1
7	8 81	9	10	11	12
Site	69				
18	17	16	15 80	14	13
19	20	21	22	23	24
30 137	29	226	27	26	25
31	32	33	34	35	36
				65	

18 South			29 East		
6	5	4	3	2	1
7	8	9	10 95	11	12
18	17	16	15	14	13
19	20	21	22	23	24
30	29	28	27	26	25
31	32	33	34	35	36
					158

18 South			30 East		
6	5	4	3	2	1
7	8	9	10	11	12
18	17	16	15	14	13
19	20	21	22	23 44	24
30	29	28	27	26	25
31	32	33	34	35	36

- 88 New Mexico State Engineers Well Reports
- 105 USGS Well Reports
- 90 Geology and Groundwater Conditions in Southern Lea, County, NM (Report 6)
- Geology and Groundwater Resources of Eddy County, NM (Report 3)
- 34 NMOCD - Groundwater Data



New Mexico Office of the State Engineer

Water Column/Average Depth to Water

(A CLW##### in the
POD suffix indicates the
POD has been replaced
& no longer serves a
water right file.)

(R=POD has been
replaced,
O=orphaned,
C=the file is
closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)
(quarters are smallest to largest)

(NAD83 UTM in meters)

(In feet)

POD															
POD Number	Code	Sub-	County	Q	Q	Q	Sec	Tws	Rng	X	Y	DepthWell	DepthWater	Water Column	
		basin		64	16	4									
RA 11807 POD1		RA	ED	1	2	3	22	17S	29E	587360	3631585	<input type="text"/>	131	76	55

Average Depth to Water: **76 feet**

Minimum Depth: **76 feet**

Maximum Depth: **76 feet**

Record Count: 1

PLSS Search:

Township: 17S **Range:** 29E

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

5/18/20 2:28 PM

WATER COLUMN/ AVERAGE DEPTH TO
WATER

USGS
science for a changing world

National Water Information System: Mapper

USGS Home
Contact USGS
Search USGS

Help Info

Sites Map

Search

Search by Street Address:
32.85542 -104.08803

Search by Place Names:
Enter Place Name

Search by Site Number(s):
Enter Site Number(s)

Search by State/Territory:
Select an Area

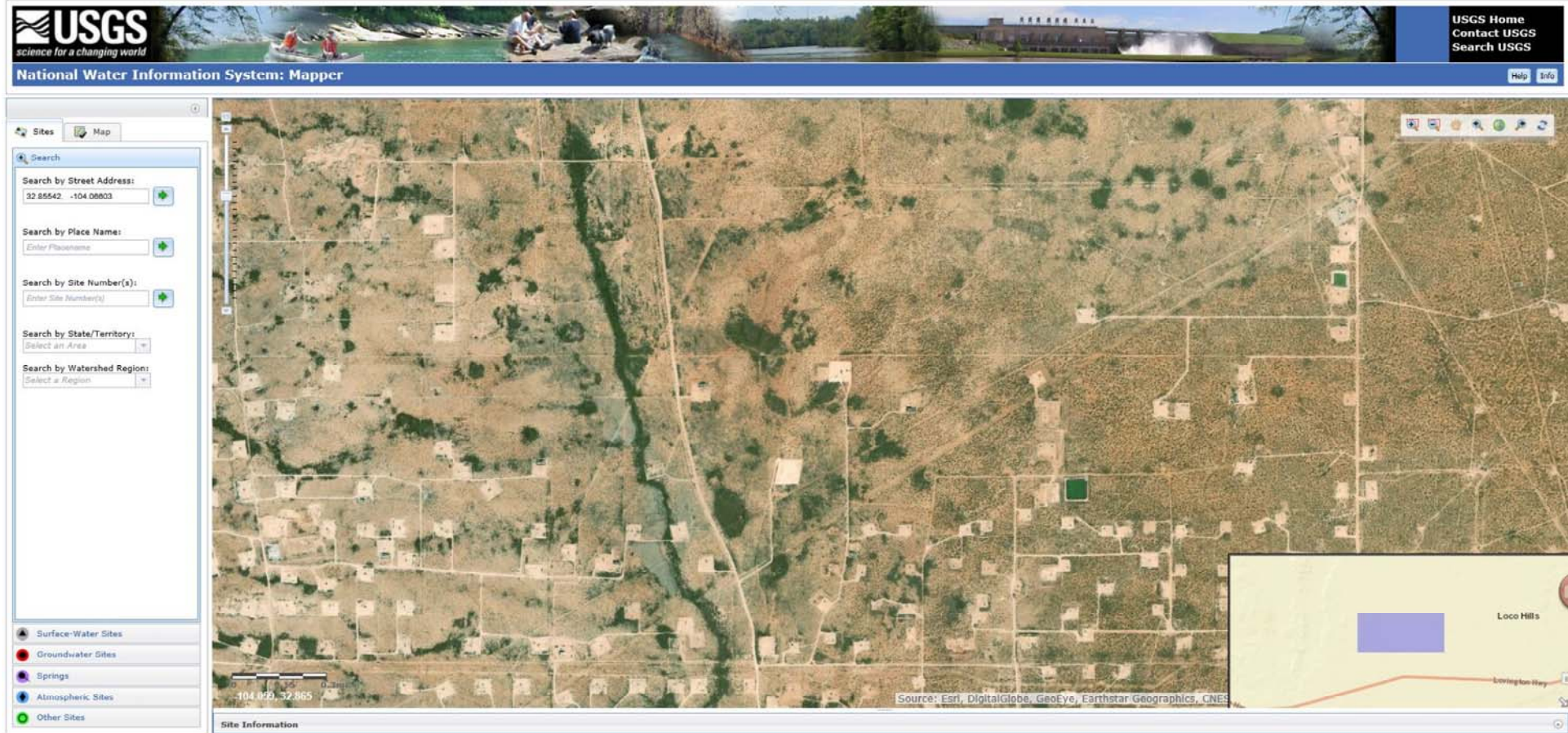
Search by Watershed Region:
Select a Region

Surface-Water Sites
Groundwater Sites
Springs
Atmospheric Sites
Other Sites

Site Information

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES

Loco Hills
Livingston Hwy



COG Operating

Dodd Federal Unit #980
Section 10, T17S, R29E
Eddy County, New Mexico
32.85542, -104.06603

- High
- Low
- Medium
- SITE LOCATION

SITE LOCATION

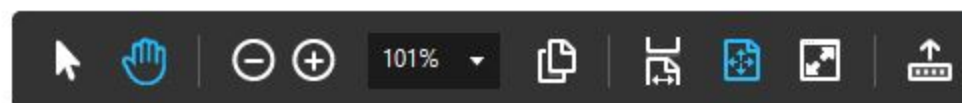


New Mexico NFHL Data



May 18, 2020

1:9,028
0 0.075 0.15 0.3 mi
0 0.1 0.2 0.4 km



MA
Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus

is made possible through a collaboration with NMDHSEM, EDAC, and FEMA

This is a non-regulatory product for informational use only. Please consult your local floodplain administrator for further information.

Appendix C



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

September 26, 2019

DAKOTA NEEL

COG OPERATING

P. O. BOX 1630

ARTESIA, NM 88210

RE: DODD FEDERAL #980

Enclosed are the results of analyses for samples received by the laboratory on 09/25/19 12:45.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-18-11. 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.

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,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive, flowing style.

Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

COG OPERATING
 DAKOTA NEEL
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

Received: 09/25/2019
 Reported: 09/26/2019
 Project Name: DODD FEDERAL #980
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 09/24/2019
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: BTM - 1 (H903295-01)

BTEx 8021B		mg/kg		Analyzed By: BF					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/26/2019	ND	1.70	85.0	2.00	0.372	
Toluene*	<0.050	0.050	09/26/2019	ND	1.71	85.5	2.00	1.89	
Ethylbenzene*	<0.050	0.050	09/26/2019	ND	1.68	84.1	2.00	1.52	
Total Xylenes*	<0.150	0.150	09/26/2019	ND	4.97	82.9	6.00	1.85	
Total BTEX	<0.300	0.300	09/26/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 84.1 % 73.3-129

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	1650	16.0	09/26/2019	ND	416	104	400	0.00		

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	09/25/2019	ND	197	98.5	200	1.16	
DRO >C10-C28*	<10.0	10.0	09/25/2019	ND	196	98.1	200	1.65	
EXT DRO >C28-C36	<10.0	10.0	09/25/2019	ND					

Surrogate: 1-Chlorooctane 87.8 % 41-142

Surrogate: 1-Chlorooctadecane 90.1 % 37.6-147

Cardinal Laboratories

*=Accredited Analyte

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 client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (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 the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

COG OPERATING
 DAKOTA NEEL
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

Received: 09/25/2019
 Reported: 09/26/2019
 Project Name: DODD FEDERAL #980
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 09/24/2019
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: BTM - 2 (H903295-02)

BTEx 8021B		mg/kg		Analyzed By: BF						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/26/2019	ND	1.70	85.0	2.00	0.372		
Toluene*	<0.050	0.050	09/26/2019	ND	1.71	85.5	2.00	1.89		
Ethylbenzene*	<0.050	0.050	09/26/2019	ND	1.68	84.1	2.00	1.52		
Total Xylenes*	<0.150	0.150	09/26/2019	ND	4.97	82.9	6.00	1.85		
Total BTEX	<0.300	0.300	09/26/2019	ND						

Surrogate: 4-Bromofluorobenzene (PID) 84.7 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	496	16.0	09/26/2019	ND	416	104	400	0.00	

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	09/25/2019	ND	197	98.5	200	1.16	
DRO >C10-C28*	<10.0	10.0	09/25/2019	ND	196	98.1	200	1.65	
EXT DRO >C28-C36	<10.0	10.0	09/25/2019	ND					

Surrogate: 1-Chlorooctane 91.0 % 41-142

Surrogate: 1-Chlorooctadecane 93.9 % 37.6-147

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

COG OPERATING
 DAKOTA NEEL
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

Received: 09/25/2019
 Reported: 09/26/2019
 Project Name: DODD FEDERAL #980
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 09/24/2019
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: BTM - 3 (H903295-03)

BTEx 8021B		mg/kg		Analyzed By: BF						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/26/2019	ND	1.70	85.0	2.00	0.372		
Toluene*	<0.050	0.050	09/26/2019	ND	1.71	85.5	2.00	1.89		
Ethylbenzene*	<0.050	0.050	09/26/2019	ND	1.68	84.1	2.00	1.52		
Total Xylenes*	<0.150	0.150	09/26/2019	ND	4.97	82.9	6.00	1.85		
Total BTEX	<0.300	0.300	09/26/2019	ND						

Surrogate: 4-Bromofluorobenzene (PID) 86.5 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	176	16.0	09/26/2019	ND	416	104	400	0.00		

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	09/25/2019	ND	197	98.5	200	1.16	
DRO >C10-C28*	<10.0	10.0	09/25/2019	ND	196	98.1	200	1.65	
EXT DRO >C28-C36	<10.0	10.0	09/25/2019	ND					

Surrogate: 1-Chlorooctane 94.2 % 41-142

Surrogate: 1-Chlorooctadecane 97.1 % 37.6-147

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

COG OPERATING
 DAKOTA NEEL
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

Received: 09/25/2019
 Reported: 09/26/2019
 Project Name: DODD FEDERAL #980
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 09/24/2019
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: BTM - 4 (H903295-04)

BTEx 8021B		mg/kg		Analyzed By: BF						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/26/2019	ND	1.70	85.0	2.00	0.372		
Toluene*	<0.050	0.050	09/26/2019	ND	1.71	85.5	2.00	1.89		
Ethylbenzene*	<0.050	0.050	09/26/2019	ND	1.68	84.1	2.00	1.52		
Total Xylenes*	<0.150	0.150	09/26/2019	ND	4.97	82.9	6.00	1.85		
Total BTEX	<0.300	0.300	09/26/2019	ND						

Surrogate: 4-Bromofluorobenzene (PID) 86.9 % 73.3-129

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	2800	16.0	09/26/2019	ND	416	104	400	0.00	

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	09/25/2019	ND	197	98.5	200	1.16	
DRO >C10-C28*	<10.0	10.0	09/25/2019	ND	196	98.1	200	1.65	
EXT DRO >C28-C36	<10.0	10.0	09/25/2019	ND					

Surrogate: 1-Chlorooctane 90.8 % 41-142

Surrogate: 1-Chlorooctadecane 93.8 % 37.6-147

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

COG OPERATING
 DAKOTA NEEL
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

Received: 09/25/2019
 Reported: 09/26/2019
 Project Name: DODD FEDERAL #980
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 09/24/2019
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: NORTH (H903295-05)

BTX 8021B		mg/kg		Analyzed By: BF						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/26/2019	ND	1.70	85.0	2.00	0.372		
Toluene*	<0.050	0.050	09/26/2019	ND	1.71	85.5	2.00	1.89		
Ethylbenzene*	<0.050	0.050	09/26/2019	ND	1.68	84.1	2.00	1.52		
Total Xylenes*	<0.150	0.150	09/26/2019	ND	4.97	82.9	6.00	1.85		
Total BTX	<0.300	0.300	09/26/2019	ND						

Surrogate: 4-Bromofluorobenzene (PID) 81.6 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	480	16.0	09/26/2019	ND	416	104	400	0.00		

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	09/25/2019	ND	197	98.5	200	1.16	
DRO >C10-C28*	<10.0	10.0	09/25/2019	ND	196	98.1	200	1.65	
EXT DRO >C28-C36	<10.0	10.0	09/25/2019	ND					

Surrogate: 1-Chlorooctane 83.0 % 41-142

Surrogate: 1-Chlorooctadecane 85.2 % 37.6-147

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

COG OPERATING
 DAKOTA NEEL
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

Received: 09/25/2019
 Reported: 09/26/2019
 Project Name: DODD FEDERAL #980
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 09/24/2019
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: SOUTH (H903295-06)

BTEx 8021B		mg/kg		Analyzed By: BF					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/26/2019	ND	1.70	85.0	2.00	0.372	
Toluene*	<0.050	0.050	09/26/2019	ND	1.71	85.5	2.00	1.89	
Ethylbenzene*	<0.050	0.050	09/26/2019	ND	1.68	84.1	2.00	1.52	
Total Xylenes*	<0.150	0.150	09/26/2019	ND	4.97	82.9	6.00	1.85	
Total BTEX	<0.300	0.300	09/26/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 83.9 % 73.3-129

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	320	16.0	09/26/2019	ND	416	104	400	0.00	

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	09/25/2019	ND	197	98.5	200	1.16	
DRO >C10-C28*	<10.0	10.0	09/25/2019	ND	196	98.1	200	1.65	
EXT DRO >C28-C36	<10.0	10.0	09/25/2019	ND					

Surrogate: 1-Chlorooctane 68.9 % 41-142

Surrogate: 1-Chlorooctadecane 70.6 % 37.6-147

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Analytical Results For:

COG OPERATING
 DAKOTA NEEL
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

Received: 09/25/2019
 Reported: 09/26/2019
 Project Name: DODD FEDERAL #980
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 09/24/2019
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: EAST (H903295-07)

BTEx 8021B		mg/kg		Analyzed By: BF						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/26/2019	ND	1.70	85.0	2.00	0.372		
Toluene*	<0.050	0.050	09/26/2019	ND	1.71	85.5	2.00	1.89		
Ethylbenzene*	<0.050	0.050	09/26/2019	ND	1.68	84.1	2.00	1.52		
Total Xylenes*	<0.150	0.150	09/26/2019	ND	4.97	82.9	6.00	1.85		
Total BTEX	<0.300	0.300	09/26/2019	ND						

Surrogate: 4-Bromofluorobenzene (PID) 84.7 % 73.3-129

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	240	16.0	09/26/2019	ND	416	104	400	0.00	

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	09/25/2019	ND	197	98.5	200	1.16	
DRO >C10-C28*	<10.0	10.0	09/25/2019	ND	196	98.1	200	1.65	
EXT DRO >C28-C36	<10.0	10.0	09/25/2019	ND					

Surrogate: 1-Chlorooctane 91.2 % 41-142

Surrogate: 1-Chlorooctadecane 93.7 % 37.6-147

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

COG OPERATING
 DAKOTA NEEL
 P. O. BOX 1630
 ARTESIA NM, 88210
 Fax To: NONE

Received: 09/25/2019
 Reported: 09/26/2019
 Project Name: DODD FEDERAL #980
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 09/24/2019
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: WEST (H903295-08)

BTX 8021B		mg/kg		Analyzed By: BF					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/26/2019	ND	1.70	85.0	2.00	0.372	
Toluene*	<0.050	0.050	09/26/2019	ND	1.71	85.5	2.00	1.89	
Ethylbenzene*	<0.050	0.050	09/26/2019	ND	1.68	84.1	2.00	1.52	
Total Xylenes*	<0.150	0.150	09/26/2019	ND	4.97	82.9	6.00	1.85	
Total BTX	<0.300	0.300	09/26/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 84.6 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	192	16.0	09/26/2019	ND	416	104	400	0.00	

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	09/25/2019	ND	197	98.5	200	1.16	
DRO >C10-C28*	<10.0	10.0	09/25/2019	ND	196	98.1	200	1.65	
EXT DRO >C28-C36	<10.0	10.0	09/25/2019	ND					

Surrogate: 1-Chlorooctane 94.6 % 41-142

Surrogate: 1-Chlorooctadecane 96.9 % 37.6-147

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Celey D. Keene, Lab Director/Quality Manager



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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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A handwritten signature in black ink, appearing to read "Celey D. Keene".

Celey D. Keene, Lab Director/Quality Manager



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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: COG Operating LLC		P.O. #:		BILL TO												ANALYSIS REQUEST																															
Project Manager: Dakota Neel		Company: COG Operating LLC																																													
Address: 2208 West Main		Attn: Jennifer Knowlton																																													
City: Artesia		Address: 600 W Illinois																																													
Phone #: (575) 746-2010		City: Midland																																													
Fax #: (575) 746-2010		State: TX Zip: 79701																																													
Project #: Project Owner:		Phone #: (432) 221-0388																																													
Project Location:		Fax #:																																													
Sampler Name: Dakota Neel																																															
FOR LAB USE ONLY																																															
Lab I.D.		Sample I.D.		(G)RAB OR (C)OMP.		# CONTAINERS		GROUNDWATER		WASTEWATER		SOIL		OIL		SLUDGE		OTHER :		ACID/BASE:		ICE / COOL		OTHER :		DATE		TIME		BTX		TPH		Chloride													
H963395		BTA-1		1		1		1		1		1		1		1		1		1		1		1		9-24-19		1:35		✓		✓		✓													
1		BTA-2		1		1		1		1		1		1		1		1		1		1		1		1:40		✓		✓		✓															
2		BTA-3		1		1		1		1		1		1		1		1		1		1		1		1:45		✓		✓		✓															
3		BTA-4		1		1		1		1		1		1		1		1		1		1		1		1:50		✓		✓		✓															
4		NORTH		1		1		1		1		1		1		1		1		1		1		1		1:55		✓		✓		✓															
5		SOUTH		1		1		1		1		1		1		1		1		1		1		1		2:00		✓		✓		✓															
6		EAST		1		1		1		1		1		1		1		1		1		1		1		2:05		✓		✓		✓															
7		WEST		1		1		1		1		1		1		1		1		1		1		1		2:10		✓		✓		✓															
8				1		1		1		1		1		1		1		1		1		1		1		2:15		✓		✓		✓															
				1		1		1		1		1		1		1		1		1		1		1		2:20		✓		✓		✓															
				1		1		1		1		1		1		1		1		1		1		1		2:25		✓		✓		✓															
				1		1		1		1		1		1		1		1		1		1		1		2:30		✓		✓		✓															
				1		1		1		1		1		1		1		1		1		1		1		2:35		✓		✓		✓															
				1		1		1		1		1		1		1		1		1		1		1		2:40		✓		✓		✓															
				1		1		1		1		1		1		1		1		1		1		1		2:45		✓		✓		✓															
				1		1		1		1		1		1		1		1		1		1		1		2:50		✓		✓		✓															
				1		1		1		1		1		1		1		1		1		1		1		2:55		✓		✓		✓															
				1		1		1		1		1		1		1		1		1		1		1		3:00		✓		✓		✓															
				1		1		1		1		1		1		1		1		1		1		1		3:05		✓		✓		✓															
				1		1		1		1		1		1		1		1		1		1		1		3:10		✓		✓		✓															
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