

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

Re: Comanche 17 State #1 30-025-31385 Sec. 17, T21S-R33E Lea County, NM December 4, 2015

RECEIVED By JKeyes at 10:07 am, Dec 16, 2015

APPROVED By JKeyes at 10:07 am, Dec 16, 2015

Ms. Jones,

COG Operating LLC would like to submit for your consideration the enclosed closure request for the above captioned well. The request is in response to the C-141 Initial report dated February 12, 2015.

Background

The release was caused when the oil tank caught fire resulting in a total loss of the battery. It was estimated that 35 barrels of oil and 20 barrels of produced water were released with 8 barrels of produced water recovered. Once all risk assessments were complete, crews were dispatched to dismantle the battery and begin clean up. Crews excavated and hauled approximately 200 yards for disposal at a NMOCD approved facility. The hauled material came from the uppermost 4' of the impacted area. Additional material from the excavation was stockpiled on location while further delineation sampling was conducted. The total depth of excavation was 12' with approximately 400 yards of impacted soil stock piled on location (excavation from 4' to 12').

Groundwater

Based on the Chevron Trend Maps, the release area would be classified at a site ranking of Zero with depth to groundwater at greater than 100'. The location is located at an elevation of approximately 3800' with the topography consistent with that of rolling hills.

Soil Assessment and Analytical Results

Initial sampling analysis indicated high BTEX concentrations. Final sampling for the impacted soil consisted of two representative samples from the stock piled material and

NMOCD December 4, 2015 Page 2

at a depth of 12.5' within the release area. Sample results show that BTEX and TPH are within RRAL's for a site ranking of Zero with chlorides levels being low in concentration. The attached site diagram contains a sample summary table with analytical results attached for your consideration.

Work Plan

COG Operating LLC has excavated the impacted area to a depth of approximately 12' with the uppermost 4' hauled for disposal. The stock piled material was sampled prior to disposal, sample results show that the stockpiled soil is suitable for placement within a site ranking of Zero. COG requests that stockpiled soil be used as backfill with additional soil brought in to bring the excavated area up to grade.

If there are no objections or further stipulations, COG Operating LLC will commence the reconstruction of the location. Please feel free to contact me with any questions or concerns at (575) 748-6933.

Sincerely,

An Course

Lupe Carrasco Environmental Coordinator

Enclosure(s): Site Diagram Analytical Results C-141 Initial C-141 Final



Comanche 17 State #1



September 28, 2015

LUPE CARRASCO COG OPERATING P. O. BOX 1630

ARTESIA, NM 88210

RE: COMANCHE 17 STATE #1

Enclosed are the results of analyses for samples received by the laboratory on 09/02/15 14:00.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/ga/lab accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/ga/lab accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/ga/lab accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/ga/lab accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/ga/lab accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/ga/lab accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/ga/lab accredited analytes and matrices visit the TCEQ website at www.tceg.texas.gov/field/ga/lab accredited analytes and matrices visit the TCEQ website at www.tceg.texas.gov/field/ga/lab accredited analytes and matrices visit the started star

Cardinal Laboratories is accreditated 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,

Celeg D. Keine

Celey D. Keene Lab Director/Quality Manager



Analytical Results For:

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

Received:	09/02/2015	Sampling Date:	08/27/2015
Reported:	09/28/2015	Sampling Type:	Soil
Project Name:	COMANCHE 17 STATE #1	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: P1 (H502339-01)

BTEX 8021B	mg/	/kg	Anaiyze	d By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.100	0.100	09/04/2015	NÐ	1.96	98.1	2.00	0.983	
Toluene*	<0.100	0.100	09/04/2015	ND	1.79	89.3	2.00	1.10	
Ethylbenzene*	0.671	0.100	09/04/2015	ND	1.84	91.8	2.00	2.38	
Total Xylenes*	1.83	0.300	09/04/2015	ND	5.74	95.7	6.00	0.630	
Total BTEX	2.50	0.600	09/04/2015	ND					
Surrogate: 4-Bromofluorobenzene (PIL	107 5	85.6-13	7						
Chloride, SM4500Cl-B	mg/	/kg	Analyze						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	128	16.0	09/24/2015	ND	416	104	400	0.00	
TPH 8015M	mg/	/kg	Analyze	d By: CK					<i>े</i>
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	241	10.0	09/03/2015	ND	180	90.2	200	1.56	
DR0 >C10-C28) >C10-C28 1610		09/03/2015	ND	196	97.9	200	2,48	
Surrogate: 1-Chlorooctane	122 9	47.2-15	7						
Surrogate: 1-Chloroactadecane	105 %	52 1-17	6						

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*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Candinal's abadety and client's enducive remarky for any claim ansing, 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 whistoever shall be dermed waived unless made in wrong 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 function, business interruptions, loss of use, or loss of profits incurred by client is subsidiaries, affiliates or successors among 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 massers or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratores.

Celley Zo Karne -

Celey D. Keene, Lab Director/Quality Manager



Analytical Results For:

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

Received:	09/02/2015	Sampling Date:	08/27/2015
Reported:	09/28/2015	Sampling Type:	Soil
Project Name:	COMANCHE 17 STATE #1	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN		

Sample ID: P2 (H502339-02)

BTEX 80218	mg/	/kg	Analyze	ed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/04/2015	ND	1.96	98.1	2.00	0.983	
Toluene*	<0.050	0.050	09/04/2015	ND	1.79	89.3	2.00	1.10	
Ethylbenzene*	lbenzene* 0.243 0.050		09/04/2015	ND	1.84	91.8	2.00	2.38	
Total Xylenes*	al Xylenes* 0,515 0.150		09/04/2015	NÐ	5.74	95.7	6.00	0.630	
Total BTEX	0.759	0.300	09/04/2015	ND					
Surrogate: 4-Bromofluorobenzene (PIL	102 9	85.6-13	7						
Chloride, SM4500CI-B	mg/	kg	Analyze	d By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	128	16.0	09/24/2015	ND	416	104	400	0.00	
TPH 8015M	mg/	kg	Analyze	d By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GR0 C6-C10	77.5	10.0	09/03/2015	ND	180	90.2	200	1.56	
DR0 >C10-C28	1100	10.0	09/03/2015	ND	196	97.9	200	2.48	
Surrogate: 1-Chlorooctane	103 %	47 2-15	7						
Surrogate: 1-Chlorooctadecane	100 %	6 52 1-17	6						

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Celleng De Kerne-

Celey D. Keene, Lab Director/Quality Manager



Analytical Results For:

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

Received:	09/02/2015	Sampling Date:	08/27/2015
Reported:	09/28/2015	Sampling Type:	Soil
Project Name:	COMANCHE 17 STATE #1	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	NOT GIVEN	· · · ·	

Sample ID: 12' (H502339-03)

BTEX 8021B	mg/	/kg	Analyze	d By: CK						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	8S	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/04/2015	ND	1.96	98.1	2.00	0.983		
Toluene*	<0.050	0.050	09/04/2015	ND	1.79	89.3	2.00	1.10		
Ethylbenzene*	0.173	0.050	09/04/2015	ND	1.84	91.8	2.00	2.38	38	
Total Xylenes*	0,172	0.150	09/04/2015	ND	ND 5.74 95.7 6.00		0.630			
Total BTEX	0.345	0.300	09/04/2015	ND						
Surrogate: 4-Bromofluorobenzene (PIE	92.1	% 85.6-13	7							
Chloride, SM4500CI-B	mg/	/kg	Analyze	d By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	80.0	16.0	09/24/2015	ND	416	104	400	0.00		
TPH 8015M	mg/	'kg	Analyze	d By: CK						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10	<10.0	10.0	09/03/2015	ND	180	90.2	200	1.56		
DRO >C10-C28	155	10.0	09/03/2015	ND	196	97.9	200	2.48		
Surrogate: 1-Chlorooctane	85.4	47.2-15	7							
Surrogate: 1-Chlorooctadecane	85.7	% 52_1-17	6							

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Celey D. Keene, Lab Director/Quality Manager



Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
	Insufficient time to reach temperature.
640 C	Chloride by SM4500CI-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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Celey D. Keene, Lab Director/Quality Manager

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e fax written chan	Phone Result: 2 Yes Fax Result: 2 Yes REMARKS: <u>9Carrasc</u> atrujillo@concho.com						15 X	15 X	TIME	x		SAMPLING		0388	79701	Midland	600 W Illinois	Robert McNeill	COG Operating LLC		70		CHAIN-O
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																							REQUEST

State of New Mexico Energy Minerals and Natural Resources

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Form C-141 Revised August 8, 2011

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Attached 🔲

Release Notificat	ion and Corrective A	ction							
	OPERATOR	🛛 Initial Report 🔲 Final Report							
Name of Company: COG Operating LLC	Contact: Robert McNeill								
Address: 600 West Illinois Avenue, Midland TX 79701	Telephone No. 432-230-0077								
Facility Name: Comanche 17 State #1	Facility Type: Battery								
Surface Owner: State Mineral Own	er:	API No. 30-025-31385							
LOCATI	ON OF RELEASE								
Unit Letter Section Township Range Feet from the No. G 17 21S 33E 1880	orth/South Line Feet from the North 1980	East/West Line County East Lea							
	1583 Longitude -103.5925003	940734							
	RE OF RELEASE								
Type of Release: Oit and Produced Water	Volume of Release: 35 bbls Oil; 20 bbls PW	Volume Recovered: 0 bbls Oil; 8 bbls PW							
Source of Release:	Date and Hour of Occurrent								
Fire	1/28/2015 3:00 pm	1/28/2015 3:00 pm							
Was Immediate Notice Given?	If YES, To Whom?								
Yes No Not Requir									
By Whom? Amanda Trujillo Was a Watercourse Reached?	Date and Hour: 1/30/2015 5								
Yes X No	If YES, Volume Impacting	the watercourse.							
If a Watercourse was Impacted, Describe Fully.*									
Describe Cause of Problem and Remedial Action Taken.*									
The oil tank caught fire and the rest of the battery burnt. This is a remover dispatched to recover standing fluid.	ste facility and no fire crew respor	ided to the blaze. Upon discovery vacuum trucks							
Describe Area Affected and Cleanup Action Taken.*									
The battery was a total loss. Crews are working to dismantle the debris from the release and we will present a remediation work plan to the NI	s. Concho will have the spill site s MOCD for approval prior to any s	ampled to delineate any possible contamination ignificant remediation work.							
I hereby certify that the information given above is true and complete f regulations all operators are required to report and/or file certain releas public health or the environment. The acceptance of a C-141 report by should their operations have failed to adequately investigate and remed or the environment. In addition, NMOCD acceptance of a C-141 repo federal, state, or local laws and/or regulations.	e notifications and perform correct the NMOCD marked as "Final R liate contamination that pose a thr	tive actions for releases which may endanger eport" does not relieve the operator of liability cat to ground water, surface water, human health							
Signature:	OIL CON	SERVATION DIVISION							
Printed Name: Amanda Trujillo	Approved by Environmental Specialist:								
Title: Senior Environmental Coordinator	Approval Date:	Expiration Date:							
E-mail Address: atrujillo@concho.com	Conditions of Approval:								

Date: February 12, 2015 * Attach Additional Sheets If Necessary

Phone: 575-748-6940

State of New Mexico

District II 811 S. First St.,	Assessed Albert	00010		Energy Mi	nerals	and Natura	l Resources		F	Revised	August 8, 2011
District III 1000 Rio Brazo						vation Div		Submit 1 Copy	y to appropri	ate Dis	trict Office in 5.29 NMAC.
District IV			_	1220	South	h St. Franc	is Dr.		condition in	141 1 2.1	5.27 Norres
1220 S. St. Fran	icis Dr., Sant	a Fe, NM 8750:	5	Sa	inta Fo	e, NM 875	05				
			Rela	ease Notific	atio	n and Co	orrective A	ction			
						OPERA	ſOR	Initi	al Report	\boxtimes	Final Report
Name of Co							bert McNeill				
		inois Avenu		d TX 79701			No. 432-230-007	17			
Facility Nat	me: Coma	nche 17 State	e #1			Facility Typ	e: Battery				
Surface Ow	mer: State	_		Mineral C	wner:			API No	o. 30-025-3	1385	
				LOCA	TIO	N OF REI	LEASE		_		
Unit Letter	Section	Township	Range	Feet from the		South Line	Feet from the	East/West Line		Coun	•
G	17	215	33E	1880		North	1980	East		Lea	
			Lati	tude 32.480944	251158	3 Longitud	e -103.5925003	40734			
				NAT	URE	OF RELI	EASE				
Type of Rele						Volume of			Recovered:		
Oil and Prod							; 20 bbls PW		l; 8 bbls PW		
Source of Re Fire	lease:					Date and H	lour of Occurrenc		Hour of Dis 5 3:00 pm	covery:	
Was Immedia	ate Notice (Tiven?				If YES, To		1/20/201.	5 5.00 più		
The second			Yes 🗌	No 🗌 Not Ro	equired		arding – NMOCD	i			
By Whom?	Amanda 1	Frujillo				Date and H	lour: 1/30/2015 5:	40 pm			
Was a Water							lume Impacting t				
			Yes 🛛	No							
If a Watercou	urse was Im	pacted, Descr	ibe Fully.*			1					
Describe Cou	an of Deal-1	em and Reme	diel A state	Teless #							
Describe Cau	ise of Probl	em and Keme	dial Action	n Taken.+							
The oil tank of	caught fire a	and the rest of	the batter	y burnt. This is a	remote i	facility and no	fire crew respon	ded to the blaze. U	pon discove	ry vacu	um trucks
were dispatel	hed to recov	er standing fl	uid.			÷	•		•	•	
Describe Are	a Affected	and Cleanup A	Action Tak	en.*							
77		~ · ·									
				ie debris. Concho pproval prior to a				any possible conta	mination fro	om the r	elease and
presented a c	ioaure requ	eacto nie istar		pprovar prior to a	ny signi	neant remeus	ation work.				
I hereby certi	fy that the i	information gi	ven above	is true and comp	lete to the	he best of my	knowledge and u	nderstand that pur	suant to NM	OCD π	iles and
								tive actions for rel			
								eport" does not rel eat to ground water			
or the enviro	ment. In a	ddition NMC	CD accent	tance of a C-141	renort A	e contamination oes not relieve	on mar pose a till e the operator of r	esponsibility for c	omnliance wa	uer, nui eith any	nan neattii
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	OIL CONSERVATION DIVISION							
Printed Name: Lupe Carrasco	Approved by Environmental Specialist:							
Title: Environmental Coordinator	Environmental Coordinator Approval Date: 12/16/2015 Expiration							
E-mail Address: gcarrasco@concho.com Date: December 4, 2015 Phone: 575-748-6940		Attached 🔲 1RP 3534						

* Attach Additional Sheets If Necessary