

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

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

Form C-141  
Revised August 8, 2011

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

### Release Notification and Corrective Action

#### OPERATOR

☐ Initial Report ☒ Final Report

Name of Company:	COG Operating LLC	Contact:	Robert McNeill
Address:	600 West Illinois Avenue, Midland TX 79701	Telephone No.	432-683-7443
Facility Name:	PATTERSON B 52 FEDERAL COM #002H	Facility Type:	Tank Battery

Surface Owner:	Federal	Mineral Owner:		API No.	30-025-40773
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#### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
A	05	19S	32E	330	North	330	East	Lea

Latitude 32.6958351 Longitude 103.7809525

#### NATURE OF RELEASE

Type of Release:	Oil	Volume of Release:	22 bbls Oil	Volume Recovered:	21 bbls Oil
Source of Release:	Tank connection to circulating line	Date and Hour of Occurrence:	November 6, 2016 Unknown	Date and Hour of Discovery:	November 6, 2016 9:00 am
Was Immediate Notice Given?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?			
By Whom?					
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Date and Hour:			
		If YES, Volume Impacting the Watercourse.			

If a Watercourse was Impacted, Describe Fully.\*

**RECEIVED**

By Olivia Yu at 2:21 pm, Feb 28, 2017

Describe Cause of Problem and Remedial Action Taken.\*

This release was caused by a corroded connection from the circulating pump to the tank. The corroded connection was removed and replaced. Vacuum trucks were dispatched to recover standing fluid.

Describe Area Affected and Cleanup Action Taken.\*

The release occurred within the lined facility. A vacuum truck was dispatched to remove all freestanding fluids. The containment has been cleaned and the impacted gravel has been removed. Fresh gravel has been placed inside the containment.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: <i>Rebecca Haskell</i>	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Rebecca Haskell	Approved by Environmental Specialist:	<i>[Signature]</i>
Title: Senior HSE Coordinator	Approval Date: 2/28/2017	Expiration Date: xx/xx/xxxx
E-mail Address: rhaskell@concho.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: 1/6/17 Phone: 432-683-7443	Provide NMOCD with a concise report of the inspection with affirmation the liner has and will continue to contain liquids.	

\* Attach Additional Sheets If Necessary

1RP-4507

**APPROVED**

By Olivia Yu at 7:45 am, Apr 10, 2017

**From:** Rebecca Haskell  
**To:** [Yu, Olivia, EMNRD](#)  
**Cc:** [Oberding, Tomas, EMNRD](#)  
**Subject:** FW: [External] Fwd: FW: (C-141 Final) Patterson B 52 Federal Com #002H (30-025-40773) 1RP-4507  
**Date:** Friday, April 7, 2017 12:56:09 PM  
**Attachments:** [image003.png](#)  
[FinalC141\\_RP4507\\_Patterson B 52 Federal Com #002H Tank Battery Final C-141 11-6-16 \(30-025-40773\).pdf](#)

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Ms. Yu,

As per our conversation on April 4, 2017, regarding lined facilities:

A final inspection has been conducted regarding the clean-up efforts made at the above mentioned lined facility. Free fluids were removed and if present the impacted gravel was removed from the liner and taken to a NMOCD approved disposal facility. The liner was inspected for damage and found to have liner integrity to contain free fluids. Please see the attached Final C-141 and picture taken during the final inspection conducted by a COG HSE representative.



Thank You,

Becky Haskell  
Senior HSE Coordinator  
COG Operating LLC  
600 W Illinois Avenue | Midland, TX 79701  
Direct: 432-818-2372 | Main: 432.683.7443  
Cell: 432-556-5130  
[rhaskell@concho.com](mailto:rhaskell@concho.com)



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**From:** Yu, Olivia, EMNRD [mailto:[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)]

**Sent:** Tuesday, February 28, 2017 3:33 PM  
**To:** Rebecca Haskell; Houston, Kristen, EMNRD  
**Cc:** Oberding, Tomas, EMNRD; aaarias@blm.gov  
**Subject:** RE: [External] Fwd: FW: (C-141 Final) Patterson B 52 Federal Com #002H (30-025-40773) 1RP-4507

Dear Ms. Haskell:

Please see the attachment for your records.

Please inspect the liner in question. It is OCD's understanding that all impacted material in the containment has been removed and the liner inspected for integrity. Provide NMOCD with a concise report of the inspection with affirmation the liner has and will continue to contain liquids. Pictures and a record of the removal of contaminated fill or proper disposal of liquids are strongly encouraged to accompany submission of initial C-141s.

Thanks,

Olivia Yu  
Environmental Specialist  
NMOCD, District I  
[Olivia.yu@state.nm.us](mailto:Olivia.yu@state.nm.us)  
575-393-6161 x113

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

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**From:** Rebecca Haskell [<mailto:RHaskell@concho.com>]  
**Sent:** Thursday, February 9, 2017 3:41 PM  
**To:** Lynch, Kristen, EMNRD <[Kristen.Lynch@state.nm.us](mailto:Kristen.Lynch@state.nm.us)>  
**Cc:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; Oberding, Tomas, EMNRD <[Tomas.Oberding@state.nm.us](mailto:Tomas.Oberding@state.nm.us)>  
**Subject:** FW: [External] Fwd: FW: (C-141 Final) Patterson B 52 Federal Com #002H (30-025-40773) 1RP-4507

Ms. Lynch,

I am checking on the status of the Closure request for this site submitted January 6, 2017. Please see below BLM approval for closure. If you have any additional questions please feel free to contact me.

Thank You,

Becky Haskell  
Senior HSE Coordinator  
COG Operating LLC  
600 W Illinois Avenue | Midland, TX 79701  
Direct: 432-818-2372 | Main: 432.683.7443  
Cell: 432-556-5130  
[rhaskell@concho.com](mailto:rhaskell@concho.com)



**From:** Arias, Arthur [<mailto:aaarias@blm.gov>]  
**Sent:** Monday, February 06, 2017 3:55 PM  
**To:** Rebecca Haskell  
**Subject:** [External] Fwd: FW: (C-141 Final) Patterson B 52 Federal Com #002H (30-025-40773)

\*\*\*\* External email. Use caution. \*\*\*\*

The closure report for the Patterson B 52 Federal Con #002 has been accepted by the BLM.  
Thank You.....

Arthur Arias  
[aaarias@blm.gov](mailto:aaarias@blm.gov)  
Environmental Protection Specialist  
Bureau Of Land Management, Carlsbad Field Office  
575-234-6230 Cell 575-499-3378

----- Forwarded message -----

**From:** **Tucker, Shelly** <[stucker@blm.gov](mailto:stucker@blm.gov)>  
**Date:** Mon, Jan 9, 2017 at 9:36 AM  
**Subject:** Fwd: FW: (C-141 Final) Patterson B 52 Federal Com #002H (30-025-40773)  
**To:** "Arias, Arthur" <[aaarias@blm.gov](mailto:aaarias@blm.gov)>

**This is yours.**

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

*Shelly J Tucker*

Environmental Protection Specialist  
O&G Spill/Release Coordinator

Bureau of Land Management  
620 E. Greene St  
Carlsbad, NM 88220

575.234.5905 - Direct  
575.361.0084 - Cellular  
575.234.6235 - Emergency Spill Number

[stucker@blm.gov](mailto:stucker@blm.gov)

The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. In such an event that the location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until the contaminant issues are fully mitigated and the location is successfully reclaimed. In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

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----- Forwarded message -----

From: **Rebecca Haskell** <[RHaskell@concho.com](mailto:RHaskell@concho.com)>

Date: Fri, Jan 6, 2017 at 12:49 PM

Subject: FW: (C-141 Final) Patterson B 52 Federal Com #002H (30-025-40773)

To: "[kristen.lynch@state.nm.us](mailto:kristen.lynch@state.nm.us)" <[kristen.lynch@state.nm.us](mailto:kristen.lynch@state.nm.us)>, "[stucker@blm.gov](mailto:stucker@blm.gov)" <[stucker@blm.gov](mailto:stucker@blm.gov)>

Cc: "Oberding, Tomas, EMNRD ([Tomas.Oberding@state.nm.us](mailto:Tomas.Oberding@state.nm.us))" <[Tomas.Oberding@state.nm.us](mailto:Tomas.Oberding@state.nm.us)>, "Jim Amos ([jamos@blm.gov](mailto:jamos@blm.gov))" <[jamos@blm.gov](mailto:jamos@blm.gov)>

Ms. Lynch / Ms. Tucker,

Attached is a Final C-141 for your consideration. If you have any additional questions please feel free to contact me.

Thank You,

Becky Haskell  
Senior HSE Coordinator  
COG Operating LLC  
600 W Illinois Avenue | Midland, TX 79701  
Direct: 432-818-2372 | Main: 432.683.7443  
Cell: 432-556-5130  
[rhaskell@concho.com](mailto:rhaskell@concho.com)



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**From:** Dakota Neel

**Sent:** Friday, November 11, 2016 12:47 PM

**To:** Lynch, Kristen, EMNRD; [stucker@blm.gov](mailto:stucker@blm.gov)

**Cc:** Rebecca Haskell; Robert McNeill; Tomás 'Doc' Oberding PhD ([tomas.oberding@state.nm.us](mailto:tomas.oberding@state.nm.us)); [James\\_Amos@blm.gov](mailto:James_Amos@blm.gov)

**Subject:** (C-141 Final) Patterson B 52 Federal Com #002H (30-025-40773)

Ms. Lynch/Ms. Tucker,

Attached is a C-141 for your consideration. If you have any additional questions please feel free to contact me.

Thank you,

**Dakota Neel**  
**HSE Coordinator**  
**COG Operating LLC**  
**Cell: [432-215-2783](tel:432-215-2783)**  
**[dneel2@concho.com](mailto:dneel2@concho.com)**

**2407 Pecos Ave.**  
**Artesia , NM 88210**



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Energy Minerals and Natural Resources

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

Form C-141  
Revised August 8, 2011

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

## Release Notification and Corrective Action

### OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: COG Operating LLC	Contact: Robert McNeill	
Address: 600 West Illinois Avenue, Midland TX 79701	Telephone No. 432-230-0077	
Facility Name: PATTERSON B 52 FEDERAL COM #002H	Facility Type: Battery	
Surface Owner: Federal	Mineral Owner: Federal	API No. 30-025-40773

### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
A	5	19S	32E	330	North	330	East	Lea

Latitude 32.6958351 Longitude -103.7809525

### NATURE OF RELEASE

Type of Release: Oil	Volume of Release: 22 bbls Oil	Volume Recovered: 21 bbls Oil
Source of Release: Tank connection to circulating line	Date and Hour of Occurrence: 11/6/2016 Unknown	Date and Hour of Discovery: 11/6/2016 9:00 AM
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour:	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

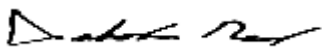

Describe Cause of Problem and Remedial Action Taken.\*

This release was caused by a corroded connection from the circulating pump to the tank. The corroded connection was removed and replaced. Vacuum trucks were dispatched to recover standing fluid.

Describe Area Affected and Cleanup Action Taken.\*

This release remained within the lined facility. Vacuum trucks will remove all standing fluid. The contaminated gravel will be removed so the liner can be pressure washed and inspected prior to replacing with fresh gravel. Concho will have the spill site inspected for any possible contamination from the release and we will present a remediation work plan to the NMOCD for approval prior to any significant remediation work.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 		<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Dakota Neel		Approved by Environmental Specialist: 	
Title: Environmental Coordinator		Approval Date: 11/14/2016	Expiration Date: 01/14/2017
E-mail Address: <a href="mailto:dneel2@concho.com">dneel2@concho.com</a>		Conditions of Approval: Please see attached directive	
Date: November 11, 2016 Phone: 575-748-6933		Attached <input type="checkbox"/> IRP 4507	

nKL1631937235  
pKL1631937522

Operator/Responsible Party,

The OCD has received the form C-141 you provided on 11/11/2016 regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 1RP 4507 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 division-approved corrective action 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 1 office in Hobbs on or before 01/11/2017. 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