

October 11, 2018

**APPROVED**

**By Olivia Yu at 8:27 am, Oct 22, 2018**

Olivia Yu  
Oil Conservation Division, District 1  
1625 French Drive  
Hobbs, NM 88240

**NMOCD grants closure  
to 1RP-4720.**

Ryan Mann  
New Mexico State Land Office  
2827 N. Dal Paso Suite 117  
Hobbs, NM 88260

Re: Closure Request Letter  
Macho State #002H (1RP-4720)  
API #: 30-025-39885  
Unit Letter E Section 02, Township 24S, Range 33E  
Lea County, NM

Ms. Yu / Mr. Mann,

COG Operating LLC (COG) is pleased to submit for your consideration the following Closure Request for the Macho #002H flare fire. The flare fire occurred on June 11, 2017 and impacted an area of pasture adjacent to the flare. This closure letter is in response to a request from the NMOCD that a soil sample be collected from the burned pasture.

A groundwater database maintained by the New Mexico Office of the State of Engineer (NMOSE) did not identify any registered water wells in Section 02, Township 24S, Range 33E. The Chevron Trend Map utilized by the NMOCD Hobbs District Office indicates depth to groundwater is greater than 50 feet below ground surface (bgs). No water wells or surface water was observed within 1,000 feet of the release site. Based on the NMOCD ranking criteria, the release area would be classified at a site ranking of zero (0).

On November 8, 2017, a COG representative collected a soil sample from the impacted area. Analytical results indicate no significant impact to the pasture and are provided below.

Macho State #002H 6/11/17				
E-02-24S-33E				
Sample ID	Date	Benzene mg/Kg	BTEX mg/Kg	TPH mg/Kg
CS-1 6"	11/8/2017	<0.050	<0.300	399

COG Operating LLC respectfully requests that the NMOCD and SLO grant closure approval for the Macho State #002H Flare Fire incident that occurred on June 11, 2017. If you have any questions or concerns please contact me.

Sincerely,

A handwritten signature in blue ink that reads "Rebecca Haskell". The signature is written in a cursive style.

Rebecca Haskell  
Senior HSE Coordinator  
[rhaskell@concho.com](mailto:rhaskell@concho.com)

Enclosed:

- (1) Site Diagram
- (2) Laboratory Analytical Reports and Chain-of-Custody Forms
- (3) Initial C-141
- (4) Final C-141

# Macho State #2H

6/11/17 Flare Fire

## Legend

- 2H MACHO STATE
- ⊙ CS-1 6"
- Impacted Area
- macho st 2h battery
- macho st 2h battery
- MACHO STATE 2H

macho st 2h battery

MACHO STATE MACHO STATE 2H

CS-1 6"

Google Earth



100 ft



November 21, 2017

DAKOTA NEEL  
COG OPERATING  
P. O. BOX 1630  
ARTESIA, NM 88210

RE: MACHO STATE #2H

Enclosed are the results of analyses for samples received by the laboratory on 11/15/17 11:07.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-16-8. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

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

Celey D. Keene  
Lab Director/Quality Manager

**Analytical Results For:**

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

 Received: 11/15/2017  
 Reported: 11/21/2017  
 Project Name: MACHO STATE #2H  
 Project Number: NONE GIVEN  
 Project Location: NOT GIVEN

 Sampling Date: 11/08/2017  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: CS1 -6" (H703194-01)**

BTEX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	11/20/2017	ND	1.81	90.4	2.00	0.271		
Toluene*	<0.050	0.050	11/20/2017	ND	1.80	90.0	2.00	1.94		
Ethylbenzene*	<0.050	0.050	11/20/2017	ND	1.73	86.7	2.00	1.10		
Total Xylenes*	<0.150	0.150	11/20/2017	ND	5.55	92.5	6.00	1.13		
Total BTEX	<0.300	0.300	11/20/2017	ND						

*Surrogate: 4-Bromofluorobenzene (PID) 105 % 72-148*

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	11/17/2017	ND	190	94.8	200	19.1		
<b>DRO &gt;C10-C28</b>	<b>256</b>	10.0	11/17/2017	ND	187	93.4	200	12.8		
<b>EXT DRO &gt;C28-C36</b>	<b>143</b>	10.0	11/17/2017	ND						

*Surrogate: 1-Chlorooctane 81.2 % 28.3-164*
*Surrogate: 1-Chlorooctadecane 91.9 % 34.7-157*

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

**Notes and Definitions**

S-06	The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.
QR-02	The RPD result exceeded the QC control limits; however, both percent recoveries were acceptable. Sample results for the QC batch were accepted based on percent recoveries and completeness of QC data.
QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
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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Celey D. Keene, Lab Director/Quality Manager



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

Form C-141  
Revised August 8, 2011

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

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 OGRID #229137	Contact: Robert McNeill
Address: 600 West Illinois Avenue, Midland TX 79701	Telephone No. 432-683-7443
Facility Name: Macho State #002H	Facility Type: Tank Battery
Surface Owner: State	Mineral Owner: State
	API No. 30-025-39885

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
E	02	24S	33E	2260	North	330	West	Lea

Latitude 32.2476959 Longitude -103.55056

**NATURE OF RELEASE**

Type of Release: Oil (Fire) and Produced Water	Volume of Release: EST. 0.5 bbls Oil & 0.5 bbls PW	Volume Recovered: 0 bbls
Source of Release: Flare	Date and Hour of Occurrence: June 11, 2017 8:00 am	Date and Hour of Discovery: June 11, 2017 8:00 am
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Ms. Yu NMOCD / Ms. Groves SLO	
By Whom? Rebecca Haskell	Date and Hour: June 12, 2017 Time of this email	
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 fluid going through the flare causing a fire. The flow of fluid to the flare was shut off and the fire quickly extinguished itself.

Describe Area Affected and Cleanup Action Taken.\*

This release occurred on location with a light mist in the pasture. No fluid was recovered due to the fire burning off any standing fluid.

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:	
Title: Senior HSE Coordinator	Approval Date:	Expiration Date:
E-mail Address: <a href="mailto:rhaskell@concho.com">rhaskell@concho.com</a>	Conditions of Approval:	Attached <input type="checkbox"/>
Date: June 12, 2017 Phone: 432-683-7443		

\* Attach Additional Sheets If Necessary

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District II  
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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

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

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

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?
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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.
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If all the actions described above have not 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: Rebecca Haskell Date: \_\_\_\_\_  
 email: \_\_\_\_\_ Telephone: \_\_\_\_\_

**OCD Only**  
 Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Incident ID	
District RP	
Facility ID	
Application ID	

## Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

**Closure Report Attachment Checklist:** *Each of the following items must be included in the closure report.*

- A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection) N/A, no remediation was conducted
- Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- Description of remediation activities N/A, no remediation was conducted

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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_  
 Signature: Rebecca Haskell Date: \_\_\_\_\_  
 email: \_\_\_\_\_ Telephone: \_\_\_\_\_

**OCD Only**

**RECEIVED**  
 By Olivia Yu at 8:28 am, Oct 22, 2018

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: [Signature] Date: \_\_\_\_\_

Printed Name: **APPROVED** Title: \_\_\_\_\_  
 By Olivia Yu at 8:28 am, Oct 22, 2018