

October 24, 2017

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

**APPROVED**

*By Olivia Yu at 10:45 am, Oct 25, 2018*

Re: Closure Request Letter  
Tyrell Fee #001H (1RP-4788)  
API #: 30-025-41026  
Unit Letter A, Section 14, Township 24S, Range 33E  
Lea County, NM

Ms. Yu,

COG Operating LLC (COG) is pleased to submit for your consideration the following Closure Request for the Tyrell Fee #001H Flare Fire. The flare fire occurred on August 10, 2017 and impacted an area of pasture adjacent to the flare. This closure letter is in response to a request from the New Mexico Oil Conservation Division (NMOCD) that a soil sample be collected from the burned pasture.

On October 7, 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.

Tyrell Fee #001H August 10, 2017					
A-14-24S-33E					
Sample ID	Date	Chloride mg/Kg	Benzene mg/Kg	BTEX mg/Kg	TPH mg/Kg
AH 1 @ Surface	10/7/2017	32.0	<0.050	<0.300	319
AH 1 @ 1'	10/7/17	32.0	<0.050	<0.300	<10.0

COG Operating LLC respectfully requests that the NMOCD grant closure approval for the Tyrell Fee #001H Flare Fire incident that occurred on August 10, 2017. If you have any questions or concerns please contact me.

October 24, 2017

Sincerely,



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

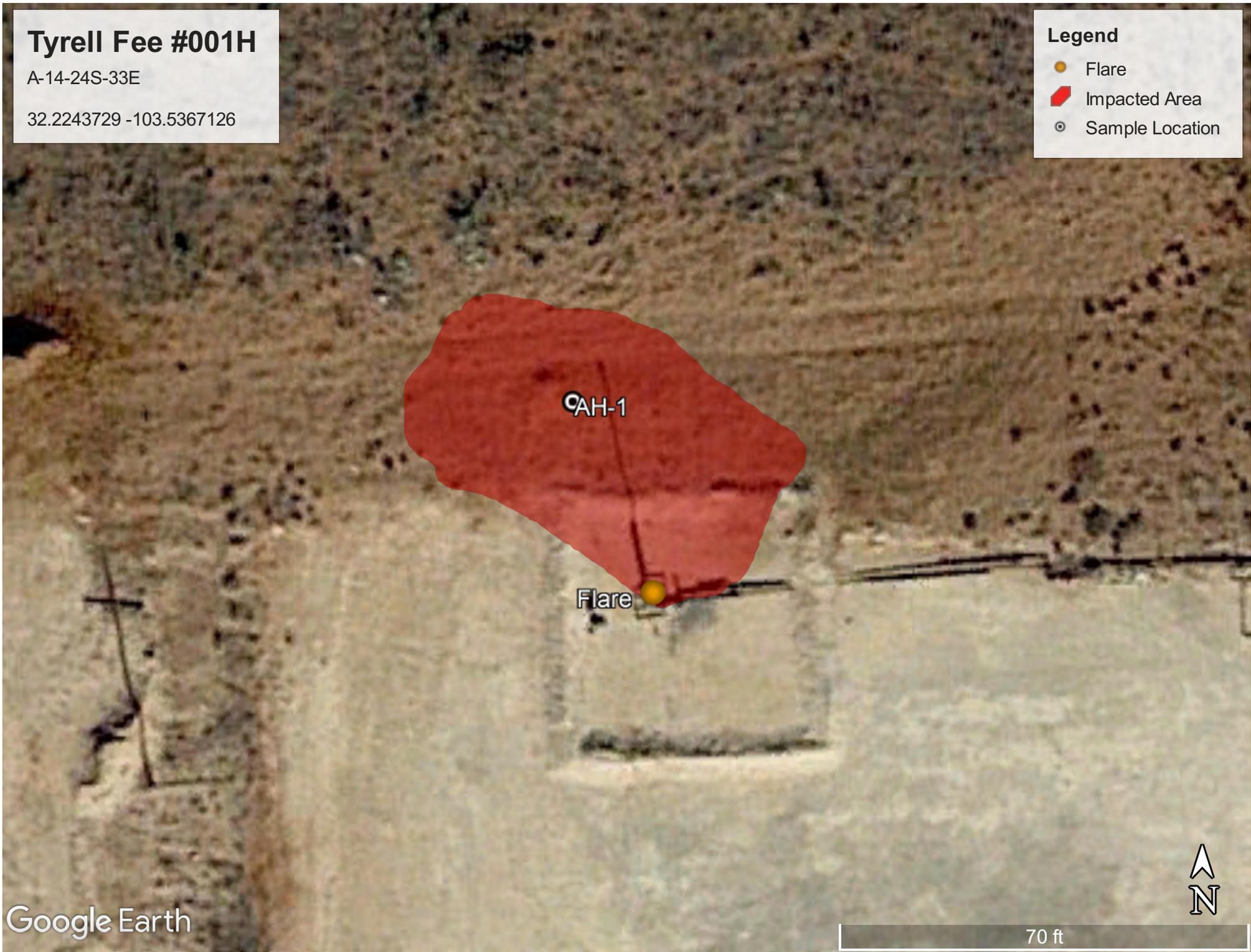
# Tyrell Fee #001H

A-14-24S-33E

32.2243729 -103.5367126

## Legend

- Flare
- Impacted Area
- ⊙ Sample Location



Google Earth



70 ft

October 13, 2017

AARON LIEB  
COG OPERATING  
P. O. BOX 1630  
ARTESIA, NM 88210

RE: TYRELL FEE #001H

Enclosed are the results of analyses for samples received by the laboratory on 10/11/17 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,



Celey D. Keene  
Lab Director/Quality Manager

**Analytical Results For:**

 COG OPERATING  
 AARON LIEB  
 P. O. BOX 1630  
 ARTESIA NM, 88210  
 Fax To: NONE

 Received: 10/11/2017  
 Reported: 10/13/2017  
 Project Name: TYRELL FEE #001H  
 Project Number: A-14-24S-33E  
 Project Location: NONE GIVEN

 Sampling Date: 10/04/2017  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: AH 1 @ SURFACE (H702750-01)**

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	10/12/2017	ND	2.01	100	2.00	0.565	
Toluene*	<0.050	0.050	10/12/2017	ND	1.82	90.8	2.00	0.154	
Ethylbenzene*	<0.050	0.050	10/12/2017	ND	1.85	92.6	2.00	0.489	
Total Xylenes*	<0.150	0.150	10/12/2017	ND	5.69	94.8	6.00	0.328	
Total BTEX	<0.300	0.300	10/12/2017	ND					

*Surrogate: 4-Bromofluorobenzene (PID) 113 % 72-148*

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>32.0</b>	16.0	10/12/2017	ND	432	108	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	10/12/2017	ND	185	92.6	200	1.05	
<b>DRO &gt;C10-C28</b>	<b>319</b>	10.0	10/12/2017	ND	201	100	200	2.44	

*Surrogate: 1-Chlorooctane 78.7 % 28.3-164*
*Surrogate: 1-Chlorooctadecane 93.1 % 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

**Analytical Results For:**

 COG OPERATING  
 AARON LIEB  
 P. O. BOX 1630  
 ARTESIA NM, 88210  
 Fax To: NONE

 Received: 10/11/2017  
 Reported: 10/13/2017  
 Project Name: TYRELL FEE #001H  
 Project Number: A-14-24S-33E  
 Project Location: NONE GIVEN

 Sampling Date: 10/04/2017  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: AH 1 @ 1' (H702750-02)**

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	10/12/2017	ND	2.01	100	2.00	0.565	
Toluene*	<0.050	0.050	10/12/2017	ND	1.82	90.8	2.00	0.154	
Ethylbenzene*	<0.050	0.050	10/12/2017	ND	1.85	92.6	2.00	0.489	
Total Xylenes*	<0.150	0.150	10/12/2017	ND	5.69	94.8	6.00	0.328	
Total BTEX	<0.300	0.300	10/12/2017	ND					

Surrogate: 4-Bromofluorobenzene (PID) 112 % 72-148

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	10/12/2017	ND	432	108	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	10/12/2017	ND	185	92.6	200	1.05	
DRO >C10-C28	<10.0	10.0	10/12/2017	ND	201	100	200	2.44	

Surrogate: 1-Chlorooctane 76.4 % 28.3-164

Surrogate: 1-Chlorooctadecane 76.5 % 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-04 The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
- 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: Tyrell Fee #001H	Facility Type: Tank Battery
Surface Owner: Private	Mineral Owner:
API No. 30-025-41026	

**LOCATION OF RELEASE**

Unit Letter A	Section 14	Township 24S	Range 33E	Feet from the 190	North/South Line North	Feet from the 660	East/West Line East	County Lea
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Latitude 32.2243729 Longitude -103.5367126

**NATURE OF RELEASE**

Type of Release: Oil (Fire)	Volume of Release: Est. 0.75 bbl.	Volume Recovered: 0 bbl.
Source of Release: Flare	Date and Hour of Occurrence: August 10, 2017 5:00 pm	Date and Hour of Discovery: August 10, 2017 5:00 pm
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	
By Whom? Rebecca Haskell	Date and Hour: August 11, 2017 9:53	
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.*		
The release was due to a vessel upset resulting in oil being sent to the flare. The back pressure valve will be replaced.		
Describe Area Affected and Cleanup Action Taken.*		
The fire impacted the location and an area in the pasture adjacent to the pad. No fluids were 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: rhaskell@concho.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: August 11, 2017 Phone: 432-683-7443		

\* Attach Additional Sheets If Necessary

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: Tyrell Fee #001H	Facility Type: Tank Battery

Surface Owner: Private	Mineral Owner:	API No. 30-025-41026
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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	14	24S	33E	190	North	660	East	Lea

Latitude 32.2243729 Longitude -103.5367126

**NATURE OF RELEASE**

Type of Release: Oil (Fire)	Volume of Release: Est. 0.75 bbl.	Volume Recovered: 0 bbl.
Source of Release: Flare	Date and Hour of Occurrence: August 10, 2017 5:00 pm	Date and Hour of Discovery: August 10, 2017 5:00 pm
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	
By Whom? Rebecca Haskell	Date and Hour: August 11, 2017 9:53	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

**APPROVED**  
By Olivia Yu at 10:45 am, Oct 25, 2018

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

The release was due to a vessel upset resulting in oil being sent to the flare. The back pressure valve will be replaced.

Describe Area Affected and Cleanup Action Taken.\*

The fire impacted the location and an area in the pasture adjacent to the pad. No fluids were recovered due to the fire burning off any standing fluid. The pasture was sampled on October 7, 2017, and analytical results indicated no significant impact to the pasture was present.

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: 10/25/2018	Expiration Date: xx/xx/xxxx
E-mail Address: rhaskell@concho.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: October 24, 2017 Phone: 432-683-7443		

\* Attach Additional Sheets If Necessary

1RP-4788