



September 1, 2023

District Supervisor
Oil Conservation Division, District 1
1625 North French Drive
Hobbs, New Mexico 88240

**Re: Liner Inspection and Closure Request
ConocoPhillips (Heritage COG Operating, LLC)
Pygmy 27 State #001H Tank Battery Release
Lea County, New Mexico
DOR: 7/30/2018
Incident ID nOY1821448734
Approximate Release Point: 32.45616°, -103.56834°**

Sir or Madam:

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips Company (ConocoPhillips) to assess a Heritage COG Operating, LLC release that occurred due to equipment failure at the Pygmy 27 State #001H Tank Battery facility. The release footprint is located in Public Land Survey System (PLSS) Unit Letter D, Section 27, Township 21 South, Range 33 East, in Lea County, New Mexico (Site). The approximate release point occurred at coordinates 32.45616°, -103.56834°, as shown on Figures 1 and 2. The Site is located on privately owned lands.

BACKGROUND

According to the State of New Mexico Form C-141 Initial Report (Appendix A), the release was caused by a failed gasket. The release occurred within the lined facility, with the exception of a 100 square foot area of overspray in the pasture north of the secondary containment. The approximate release extent is presented in Figure 3.

The release consisted of approximately 20 barrels (bbls) of oil and 20 bbls of produced water, of which 13 bbls oil and 12 bbls of produced water were recovered. The C-141 form for the release was submitted to the New Mexico Oil Conservation Division (NMOCD) by COG Operating, LLC (COG) on July 30, 2018. The NMOCD approved the initial C-141 on August 2, 2018, and subsequently assigned the release the Remediation Permit (RP) number 1RP-5143 and the Incident ID nOY1821448734.

LAND OWNERSHIP

According to the NMOCD Oil and Gas Map, the site is located is Private land. Prior to assessment and remedial activities, the appropriate parties were contacted and informed of the work and work was coordinated with the landowner.

SITE CHARACTERIZATION

A site characterization was performed and no sinkholes, residences, schools, hospitals, institutions, churches, springs, stream bodies, private domestic water wells, wetlands, incorporated municipal boundaries, subsurface mines, or floodplains are located within the distances specified in 19.15.29 New Mexico Administrative Code (NMAC). The Site is in an area of low karst potential.

According to the New Mexico Office of the State Engineers (NMOSE) reporting system, there are two water wells within ½ mile (800m) of the Site with an average depth to groundwater of 575 feet below ground surface (bgs). The site characterization data is included in Appendix B.

Tetra Tech

901 West Wall St., Suite 100, Midland, TX 79701

Tel 432.682.4559 Fax 432.682.3946 www.tetrattech.com

REGULATORY FRAMEWORK

Based upon the release footprint and in accordance with Subsection E of 19.15.29.12 NMAC, per 19.15.29.11 NMAC, and the site characterization data was used to determine recommended remedial action levels (RRALs) for benzene, toluene, ethylbenzene, and xylene (collectively referred to as BTEX), total petroleum hydrocarbons (TPH), and chlorides in soil.

Based on the site characterization and in accordance with Table I of 19.15.29.12 NMAC, the RRALs for the Site are as follows:

Constituent	Site RRAL
Chloride	20,000 mg/kg
TPH (GRO+DRO+ORO)	2,500 mg/kg
BTEX	50 mg/kg
Benzene	10 mg/kg

Additionally, the reclamation requirements for surface soils (0-4 feet bgs) in the pasture are as follows:

Constituent	Site RRAL
Chloride	600 mg/kg
TPH (GRO+DRO+ORO)	100 mg/kg
BTEX	50 mg/kg
Benzene	10 mg/kg

INITIAL SITE ASSESSMENT ACTIVITIES AND SAMPLING RESULTS

On August 6, 2018 TRC Environmental Corporation (TRC) conducted initial assessment activities at the Site on behalf of COG. During the initial assessment, TRC collected three (3) soil samples from the overspray area in an effort to determine the vertical extent of the release. Three (3) soil samples were collected from the inferred edges of the overspray area to determine the horizontal extent. A total of six (6) soil samples were sent to Xenco Laboratories in Lubbock, Texas to be analyzed for chloride via EPA Method 300.0, TPH via EPA Method 8015M, and BTEX via EPA Method 8261B.

TRC returned to the site on October 25, 2018 to collect one (1) additional soil sample from the surface of the overspray area. TRC also conducted a liner inspection and collected photo documentation to provide proof of liner integrity beneath the areas impacted where gravel had been removed. One (1) sample was sent to Cardinal Laboratories in Hobbs, New Mexico to be analyzed for chloride via Standard Method 4500Cl-B, TPH via EPA Method 8015M, and BTEX via EPA Method 8261B. The approximate release extent and 2018 sampling locations are presented in Figure 3.

Analytical results from the 2018 sampling activities are summarized in Table 1. Analytical results exceeded the reclamation limit for chloride (600 mg/kg) in the 0.5-foot interval at HA-1 and the 0-0.25-foot interval at HA-1B. Analytical results exceeded the reclamation limit for TPH (100 mg/kg) in the 0-0.25-foot interval at HA-1B. There were no analytical results which exceeded the Site RRALs.

CLOSURE REQUEST AND NMOCD REJECTION

TRC prepared a Site Assessment Summary and Closure Report dated November 11, 2018 based on the results of the assessment activities. A copy of this report is available through the NMOCD online permitting files. The closure request was rejected by NMOCD via an email dated April 11, 2023, with the following comments:

- *"The area of the "overspray" must meet the requirements all of 19.15.29 NMAC. HA-1B has not been fully delineated."*

- *Per the conditions of approval for the initial C-141, a liner inspection needs to be performed. Pictures and an affirmation that the liner has and will continue to contain liquids will need to be included in the report.*
- *1RP-5143 closed. Refer to incident #NOY1821448734 in all future communication.*
- *Submit a complete report though the OCD Permitting website by 7/11/2023."*

A 90-day extension request to July 11, 2023, was rejected in an email dated July 21, 2023. NMOCD correspondence is included in Appendix C.

ADDITIONAL ASSESSMENT

Following the NMOCD rejection of the initial closure request, Tetra Tech conducted additional soil sampling at the Site on behalf of ConocoPhillips to assess the current soil concentration levels within the reported release and complete delineation of the release. On August 8, 2023, Tetra Tech installed five (5) hand auger borings (AH-23-1 through AH-23-5) in the reported release extent. Boring AH-23-1 was installed to a depth of 3 feet bgs to obtain vertical delineation per NMOCD directives. Borings AH-23-2 through AH-23-5 were installed to a total depth of 1 foot bgs each to confirm the horizontal extent of the release. The August 2023 additional sampling locations are presented in Figure 4.

A total of six (6) soil samples sent to Cardinal Laboratories in Hobbs, New Mexico to be analyzed for chloride via Standard Method 4500Cl-B, TPH via EPA Method 8015M, and BTEX via EPA Method 8261B. A copy of the laboratory analytical report and chain-of-custody documentation are included in Appendix D.

Analytical results from the 2023 additional sampling activities are summarized in Table 2. All analytical results were below the reclamation limits and the Site RRALs for all constituents.

LINER INTEGRITY

In accordance with 19.15.29.11(A)(5)(a) NMAC, notification of a liner inspection at the Pygmy 27 State #001H Tank Battery was sent via email to the NMOCD on August 3, 2023. The liner inspection notification email correspondence is included in Appendix C.

On August 8, 2023, Tetra Tech personnel performed an inspection of the liner within the secondary containment of the Pygmy 27 State #001H Tank Battery. This work was completed to verify the previous documentation of liner integrity provided by TRC and Heritage Concho. The clean base course/gravel material was carefully extracted from the area surrounding the tanks and the surrounding vicinity. The liner was observed to underlie the entirety of the tank battery secondary containment area. The liner was intact with no visible rips or tears and encompassed by a 2-foot-tall earthen berm. The liner extended up and over the berm and was anchored on the exterior. At the time of the inspection, the liner was intact and had the ability to contain the leak in question. Photographic documentation of the liner inspection is included in Appendix E.

CONCLUSION

Based on the results of the additional assessment and liner inspection, ConocoPhillips respectfully requests closure of the subject incident. The release footprint is located predominantly within a lined containment area. The liner integrity demonstration is complete. The affected area of the liner has been visually inspected where the release occurred, and the liner remains intact and had the ability to contain the leak in question. Five business days' notice was provided to the appropriate division district office before conducting the liner inspection.

The analytical results associated with the soil assessment conducted in the overspray area (outside of the lined containment) in the pasture north of the tank battery facility were below the reclamation requirements for all constituents at all sampled locations. Therefore, no additional remediation activities are required to address this release.

Liner Inspection and Closure Request
September 1, 2023

ConocoPhillips

The final C-141 forms are enclosed in Appendix A. If you have any questions concerning the liner inspection for the Site, please call me at (432) 210-6952 or Christian at (512) 288-6281.

Sincerely,
Tetra Tech, Inc.

A handwritten signature in blue ink, appearing to read 'SAbbott', with a large loop at the end.

Samantha Abbott
Project Manager

A handwritten signature in blue ink, appearing to read 'Christian M. Llull', with a long horizontal stroke at the end.

Christian M, Llull, P.G
Program Manager

cc:
Mr. Moises Cantu, PBU - ConocoPhillips

LIST OF ATTACHMENTS

Figures:

- Figure 1 – Overview Map
- Figure 2 – Topographic Map
- Figure 3 – Approximate Release Extent and Initial Assessment (TRC)
- Figure 4 – Approximate Release Extent and Additional Site Assessment (TT)
- Figure 5 - Approximate Release Extent and Liner Inspection

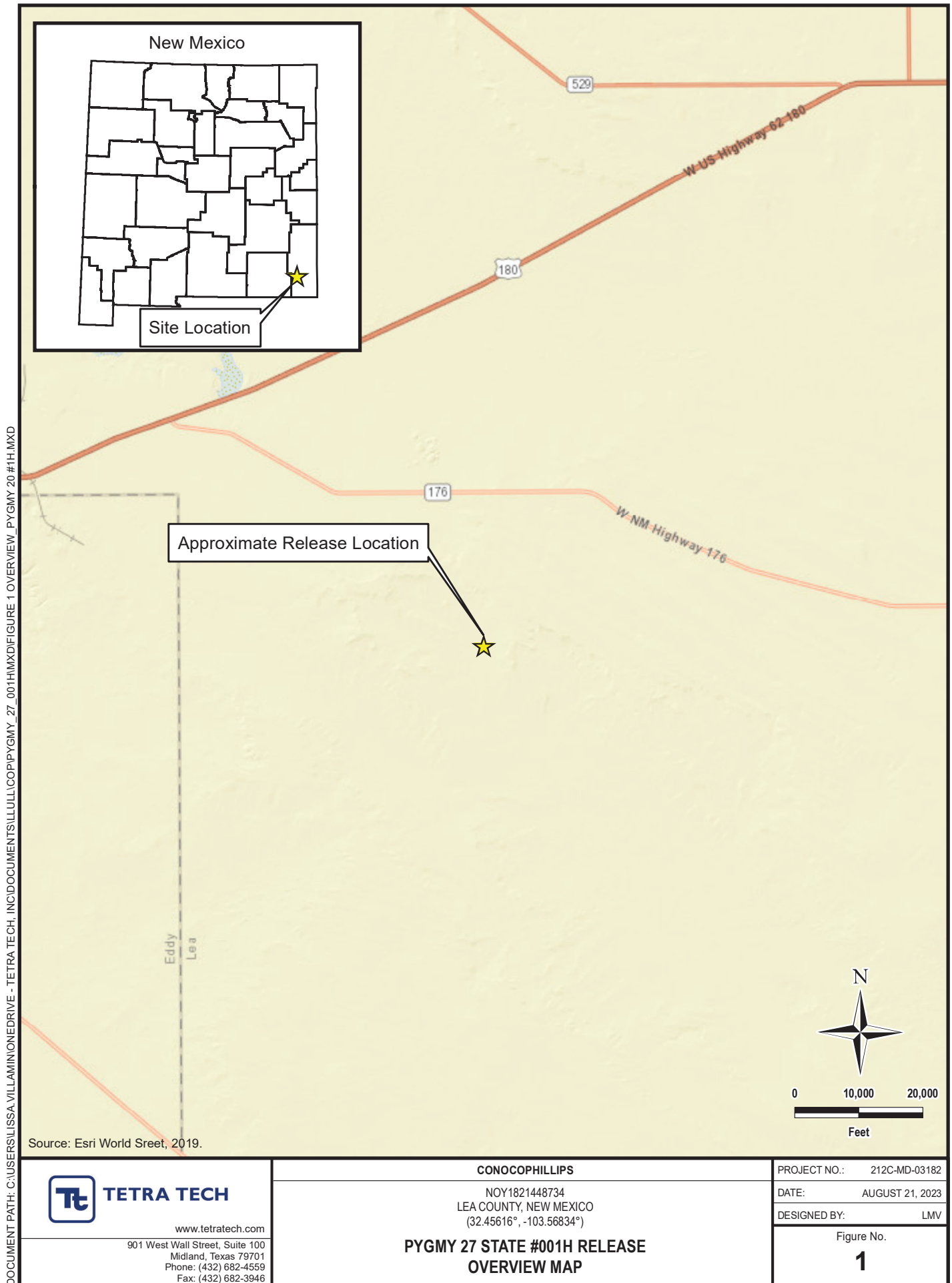
Tables:

- Table 1 – Summary of Analytical Results – 2018 Soil Assessment
- Table 2 – Summary of Analytical Results – 2023 Soil Assessment

Appendices:

- Appendix A – C-141 Forms
- Appendix B – Site Characterization Data
- Appendix C – Regulatory Correspondence
- Appendix D – Laboratory Analytical Data
- Appendix E – Photographic Documentation

FIGURES



DOCUMENT PATH: C:\USERS\LISSA.VILLAMONEDRIVE - TETRA TECH\INC\DOCUMENTS\ILLULLICOP\PYGMY 27 001H\MXD\FIGURE 2 TOPO PYGMY 20 #1H.MXD

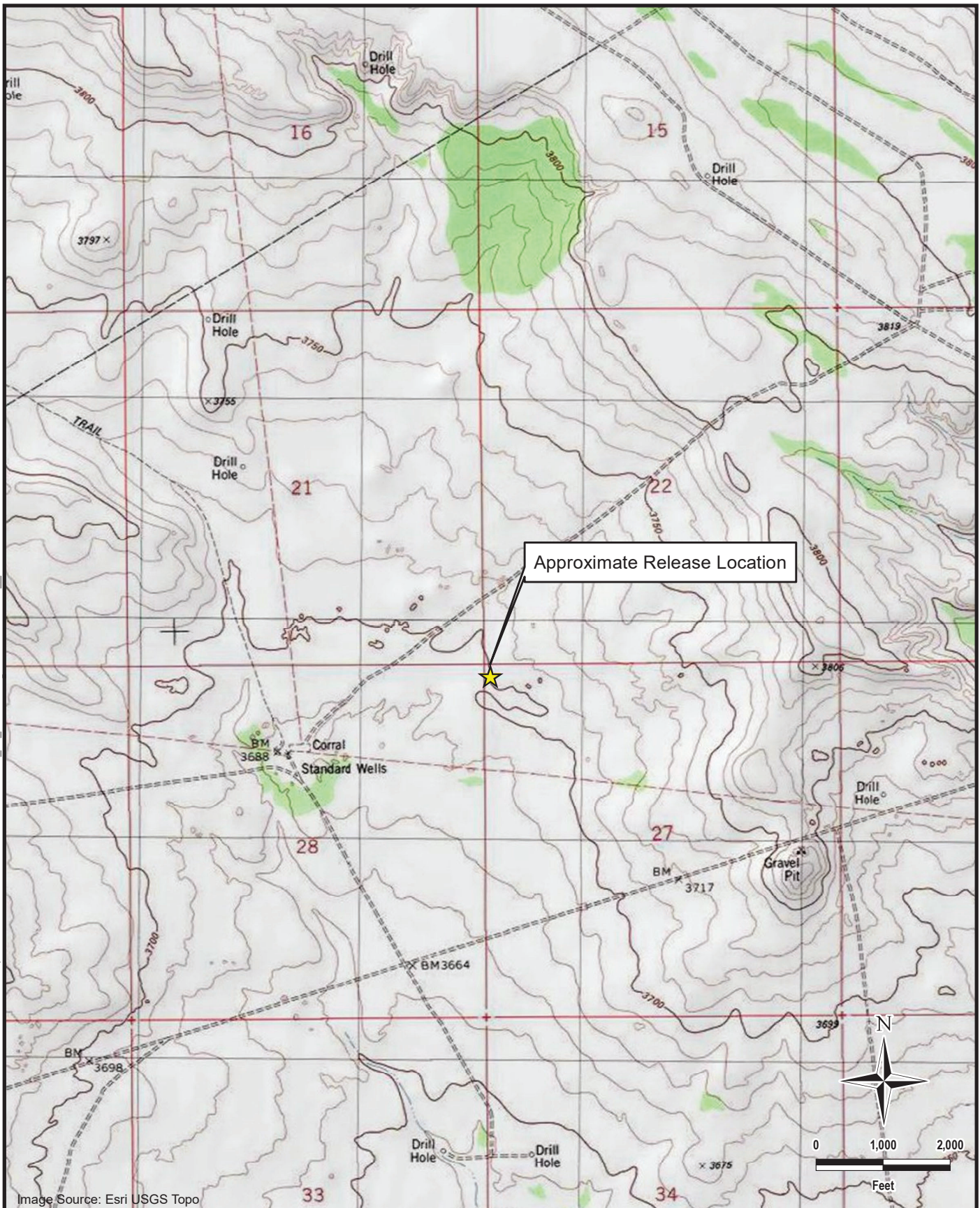


Image Source: Esri USGS Topo

**TETRA TECH**

www.tetrattech.com

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Midland, Texas 79701
Phone: (432) 682-4559
Fax: (432) 682-3946

CONOCOPHILLIPS

NOY1821448734
LEA COUNTY, NEW MEXICO
(32.45616°, -103.56834°)

**PYGMY 27 STATE #001H RELEASE
TOPOGRAPHIC MAP**

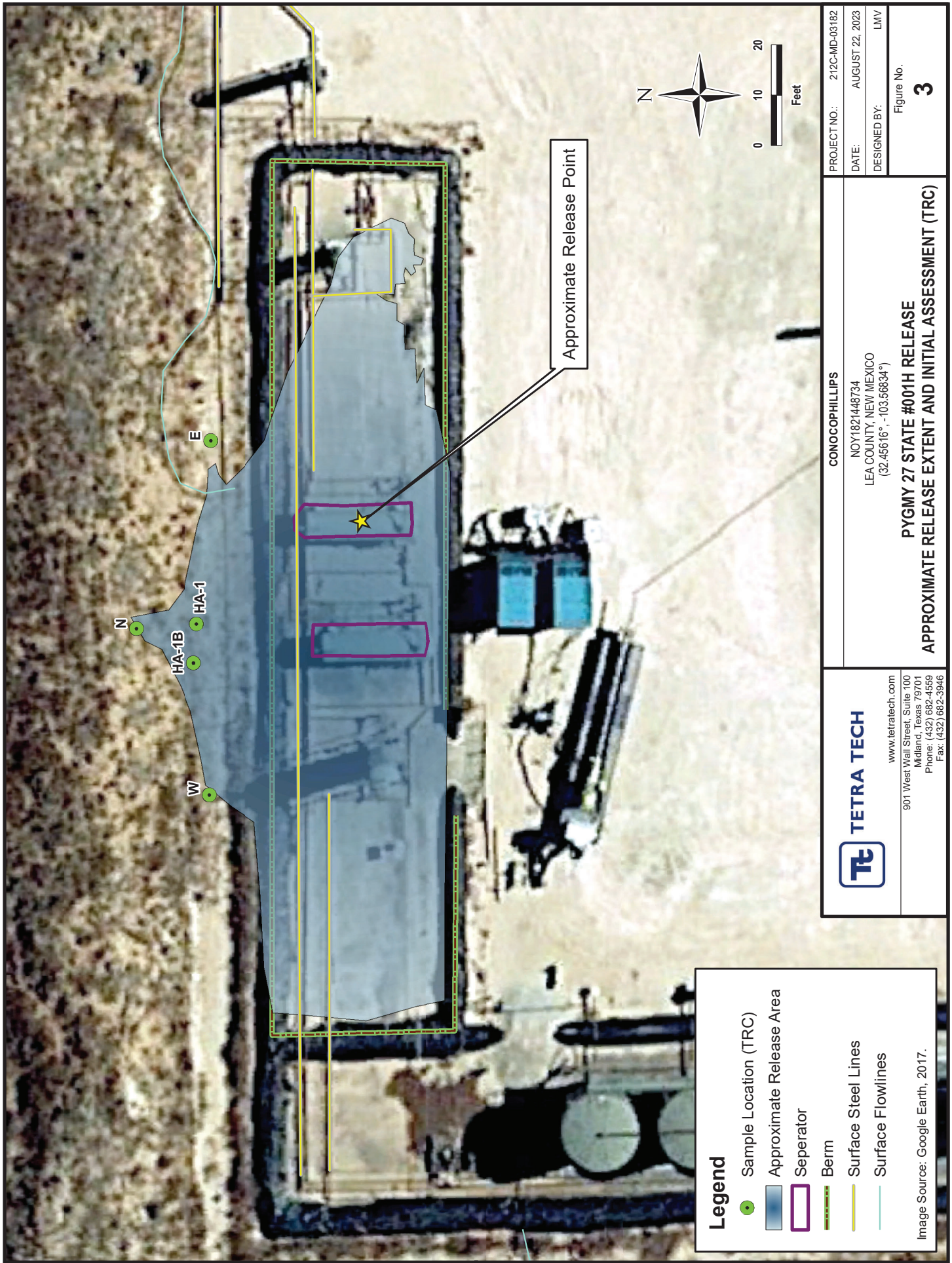
PROJECT NO.: 212C-MD-03182

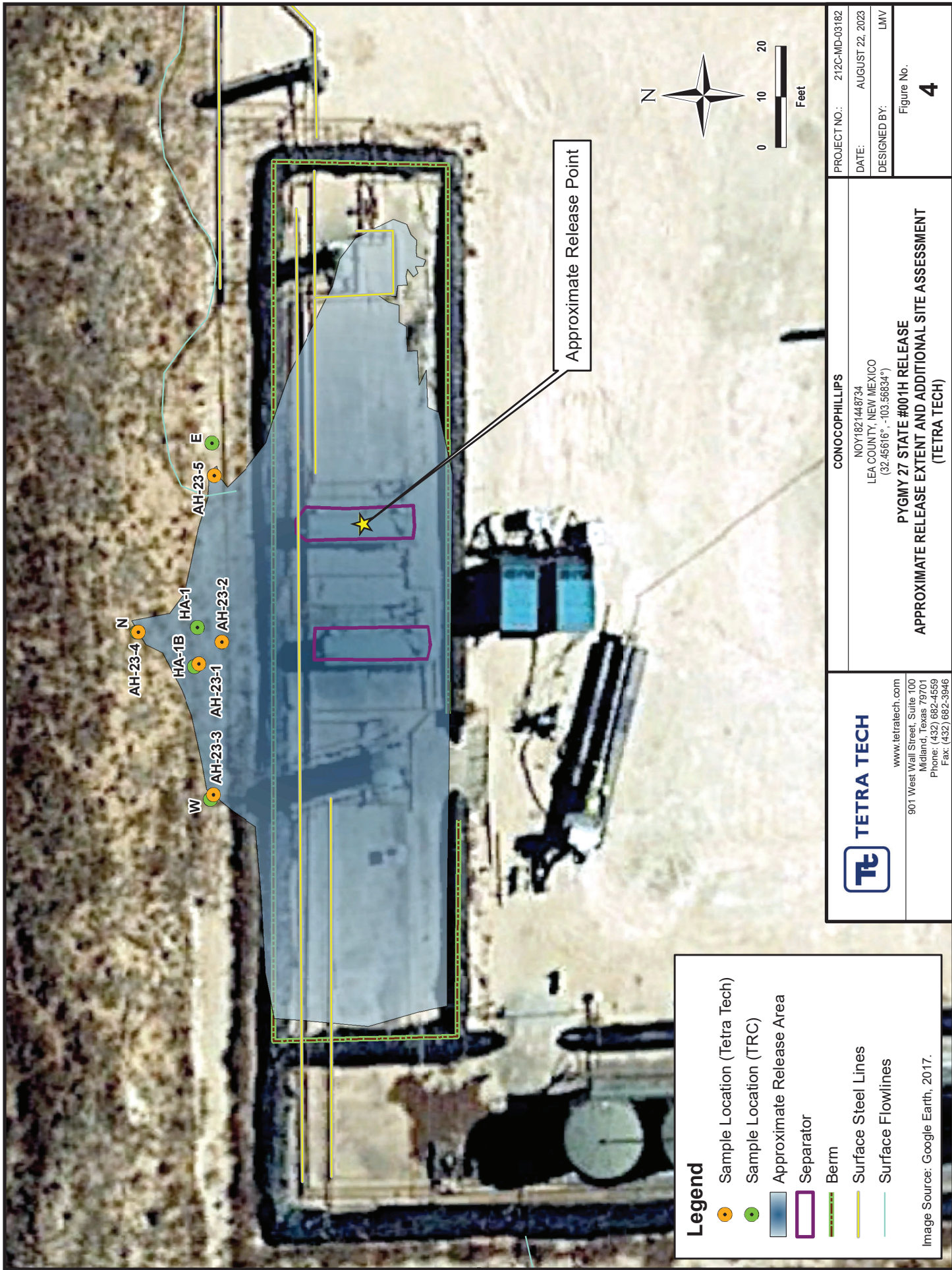
DATE: AUGUST 21, 2023

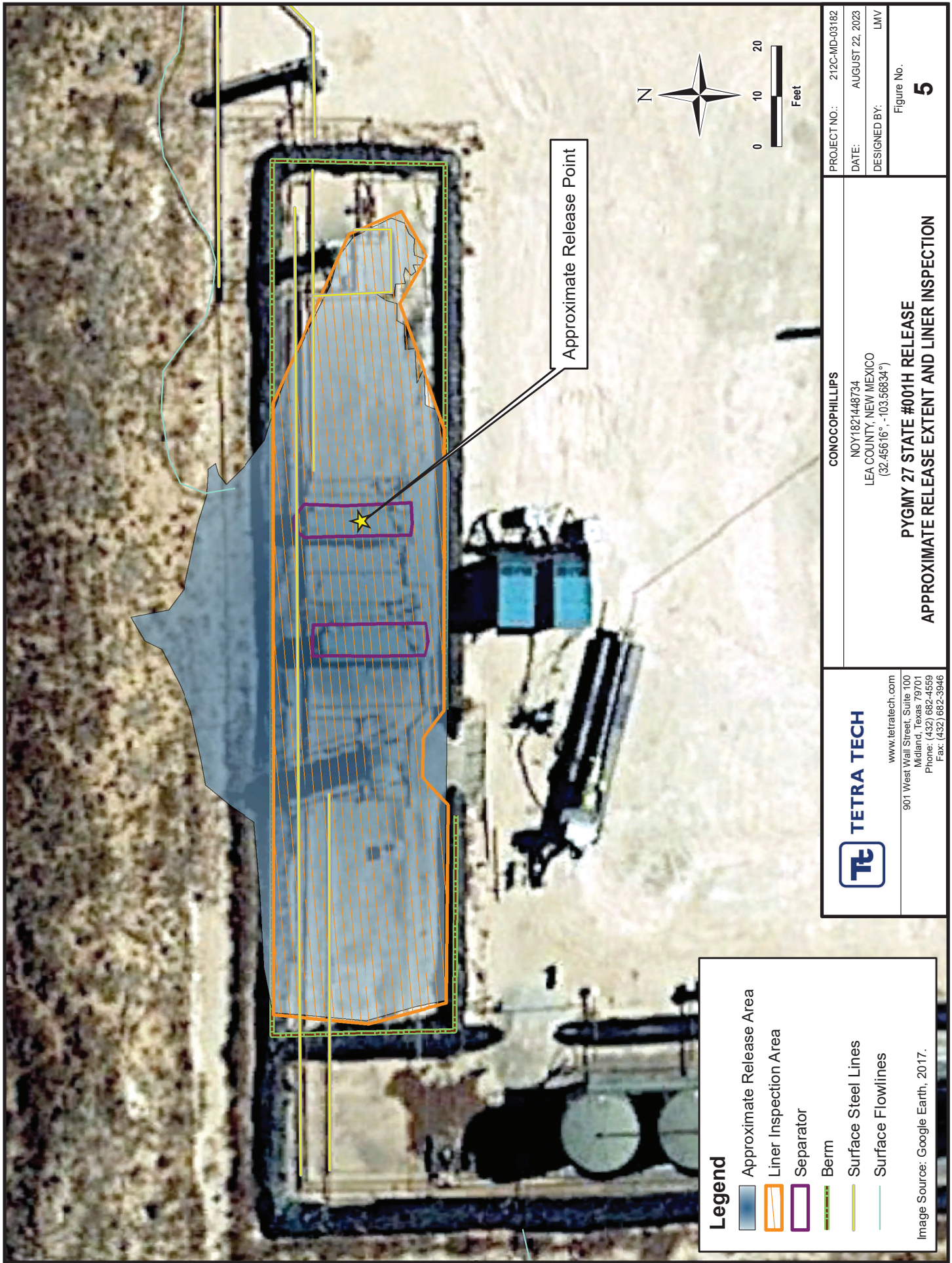
DESIGNED BY: LMV

Figure No.

2







TABLES

TABLE 1
SUMMARY OF ANALYTICAL RESULTS
2018 SOIL ASSESSMENT (TRC) - nOY1821448734
CONOCOPHILLIPS
PYGMY 27 STATE #001H RELEASE
LEA COUNTY, NM

Sample ID	Sample Date	Sample Depth ft. bgs	Chloride ¹ mg/kg	BTEX ²					TPH ³				
				Benzene	Toluene	Ethylbenzene	m,p-Xylenes	o-Xylene	Total Xylenes	Total BTEX	GRO	DRO	Total TPH
HA-1	8/6/2018	0.5	11,200	mg/kg Q	mg/kg Q	mg/kg Q	mg/kg Q	mg/kg Q	mg/kg Q	mg/kg Q	mg/kg Q	mg/kg Q	mg/kg Q
				<0.0179	<0.0179	<0.0179	<0.0358	<0.0179	<0.0179	<0.0179	<3.58	<3.58	<3.58
				<0.0198	<0.0198	<0.0198	<0.0396	<0.0198	<0.0198	<0.0198	<3.96	<3.96	<3.96
N	8/6/2018	2	57.6	mg/kg Q	mg/kg Q	mg/kg Q	mg/kg Q	mg/kg Q	mg/kg Q	mg/kg Q	mg/kg Q	mg/kg Q	mg/kg Q
				<0.0177	<0.0177	<0.0177	<0.0354	<0.0177	<0.0177	<0.0177	<3.54	<3.54	<3.54
				<0.0192	<0.0192	<0.0192	<0.0385	<0.0192	<0.0192	<0.0192	<3.85	<3.85	<3.85
E	8/6/2018	1	<25.0	U	<0.0200	U	<0.0399	U	<0.02	U	<3.99	<25.3	U
W	8/6/2018	1	131	U	<0.0188	U	<0.0376	U	<0.0188	U	<3.76	67.8	U
Sample ID	Sample Date	Sample Depth ft. bgs	Chloride ⁴ mg/kg	BTEX ²					TPH ³				
				Benzene	Toluene	Ethylbenzene	Total Xylenes	Total BTEX	GRO C ₉ - C ₁₀	DRO > C ₁₀ - C ₁₆	EXT DRO > C ₁₆ - C ₁₈	Total TPH (GRO+DRO+EXT DRO)	Total TPH
HA-1B	10/25/2018	0 - 0.25	1,760	mg/kg QM-07	mg/kg Q	mg/kg Q	mg/kg Q	mg/kg Q	mg/kg Q	mg/kg Q	mg/kg Q	mg/kg Q	mg/kg Q

NOTES:
ft. Feet
bgs Below ground surface
mg/kg Milligrams per kilogram
TPH Total Petroleum Hydrocarbons
GRO Gasoline range organics
DRO Diesel range organics
MRO Motor Oil range organics
NS Sample not analyzed for parameter
1 EPA Method 300.0
2 EPA Method 8021B
3 Method SW8015 Mod
4 Standard Method 4500C18

Bold and italicized values indicate exceedance of proposed Remediation RfALs and/or Reclamation Requirements.

QUALIFIERS:
U Analyte was not detected.
QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS.

TABLE 2
SUMMARY OF ANALYTICAL RESULTS
2023 SOIL ASSESSMENT (TT) - nOY1821448734
CONOCOPHILLIPS
PYGMY 27 STATE #001H RELEASE
LEA COUNTY, NM

Sample ID	Sample Date	Sample Depth ft. bgs	Chloride ¹ mg/kg		BTX ²								TPH ³					Total TPH (GRO+DRO+EXT DRO) mg/kg	
					Benzene mg/kg		Toluene mg/kg		Ethylbenzene mg/kg		Total Xylenes mg/kg		Total BTEX mg/kg		GRO C ₉ - C ₁₀ mg/kg	DRO > C ₁₀ - C ₂₈ mg/kg	EXT DRO		
																	> C ₂₈ - C ₃₆ mg/kg		Q
AH-23-1	8/8/2023	0-1			32.0	<0.050	<0.050	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0		-		
		2-3			16.0	<0.050	<0.050	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0		-		
AH-23-2	8/8/2023	0-1			16.0	<0.050	<0.050	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0		-		
AH-23-3	8/8/2023	0-1			16.0	<0.050	<0.050	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0		-		
AH-23-4	8/8/2023	0-1			32.0	<0.050	<0.050	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0		-		
AH-23-5	8/8/2023	0-1			16.0	<0.050	<0.050	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0		-		

NOTES:
ft. Feet
bgs Below ground surface
mg/kg Milligrams per kilogram
TPH Total Petroleum Hydrocarbons
GRO Gasoline range organics
DRO Diesel range organics
1 Standard Method 4500Cl-B
2 Method 8021B
3 Method 8015M

APPENDIX A C-141 Forms

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 April 3, 2017
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 #)	Contact: Robert McNeill
Address: 600 West Illinois Avenue, Midland TX 79701	Telephone No. 432-683-7443
Facility Name: Pygmy 27 State #001H	Facility Type: Tank Battery
Surface Owner: Private	Mineral Owner: State
API No. 30-025-40352	

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
D	27	21S	33E	330	North	190	West	Lea

Latitude 32.4561577 Longitude -103.5683441 NAD83

NATURE OF RELEASE

Type of Release: Oil & Produced Water	Volume of Release: 20 bbl. Oil 20 bbl. Produced Water	Volume Recovered: 13 bbl. Oil 12 bbl. Produced Water
Source of Release: Gasket Failure	Date and Hour of Occurrence: July 30, 2018 11:00am	Date and Hour of Discovery: July 30, 2018 11:00am
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Olivia Yu- NMOCD Christina Hernandez – NMOCD Ryan Mann- SLO	
By Whom? DeAnn Grant	Date and Hour: July 30, 2018 4:46pm	
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.*

RECEIVED

By Olivia Yu at 1:27 pm, Aug 02, 2018



Describe Cause of Problem and Remedial Action Taken.*

The release was caused by a failed gasket. The gasket is being replaced.

Describe Area Affected and Cleanup Action Taken.*

The release occurred within the lined facility. A vacuum truck was dispatched to remove all freestanding fluids. Concho will have the spill area evaluated for any possible impact from the release and we will present a remediation work plan to the NMOCD for approval prior to any significant remediation activities.

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: 		OIL CONSERVATION DIVISION	
Printed Name: DeAnn Grant		Approved by Environmental Specialist: 	
Title: HSE Administrative Assistant	Approval Date: 8/2/2018	Expiration Date:	
E-mail Address: agrant@concho.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: July 30, 2018	Please inspect liner in question. Provide NMOCD with a concise report of the inspection with affirmation the liner has and will continue to contain liquids.		1RP-5143
Phone: 432-253-4513			

* Attach Additional Sheets If Necessary

nOY1821448734

pOY1821449586

Incident ID	nOY1821448734
District RP	1RP-5143
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?	572 (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.

Incident ID	nOY1821448734
District RP	1RP-5143
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: Moises H Cantu Garcia Title: Sr. Environmental Engineer

Signature: Moises H Cantu Garcia Date: 8/31/2023

email: Moises.H.CantuGarcia@conocophillips.com Telephone: 432-688-6090

OCD Only

Received by: _____ Date: _____

Incident ID	nOY1821448734
District RP	1RP-5143
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)
- ☒ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☐ Description of remediation activities

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: Moises H Cantu Garcia Title: Sr. Environmental Engineer
Signature: Moises H Cantu Garcia Date: 8/31/2023
email: Moises.H.CantuGarcia@conocophillips.com Telephone: 432-688-6090

OCD Only

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: Brittany Hall Date: 9/5/2023

Printed Name: Brittany Hall Title: Environmental Specialist

APPENDIX B

Site Characterization Data

OCD Surface Ownership



8/21/2023, 1:26:40 PM

Mineral Ownership

N-No minerals are owned by the U.S.

Land Ownership

P

S

U.S. BLM, Maxar, Microsoft, Esri, HERE, Garmin, iPC

National Flood Hazard Layer FIRMette

103°34'25"W 32°27'39"N



Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

Without Base Flood Elevation (BFE)
Zone A, V, AE9

With BFE or Depth
Zone AE, AO, AH, VE, AP

Regulatory Floodway

SPECIAL FLOOD HAZARD AREAS

0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile
Zone X

Future Conditions 1% Annual Chance Flood Hazard
Zone X

Area with Reduced Flood Risk due to Levee. See Notes.
Zone X

Area with Flood Risk due to Levee
Zone D

OTHER AREAS OF FLOOD HAZARD

NO SCREEN
Zone X

Area of Minimal Flood Hazard
Zone D

Effective LOMRs
Zone D

Area of Undetermined Flood Hazard
Zone D

OTHER AREAS

Cross Sections with 1% Annual Chance Water Surface Elevation
20.2
17.5

Coastal Transect
8

Base Flood Elevation Line (BFE)

Limit of Study

Jurisdiction Boundary

Coastal Transect Baseline

Profile Baseline

Hydrographic Feature

OTHER FEATURES

Digital Data Available

No Digital Data Available

Unmapped

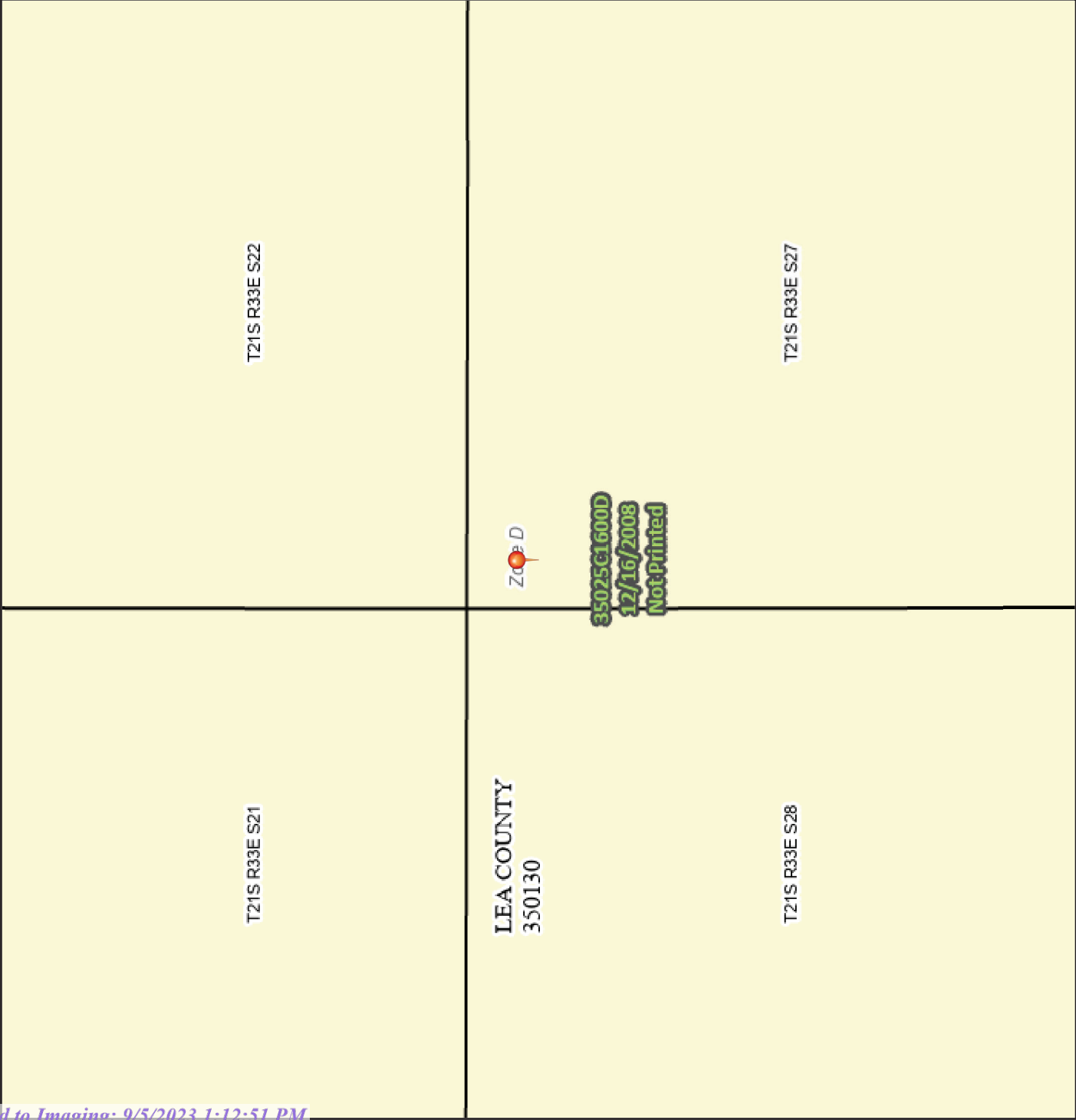
MAP PANELS

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on **8/21/2023 at 2:34 PM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

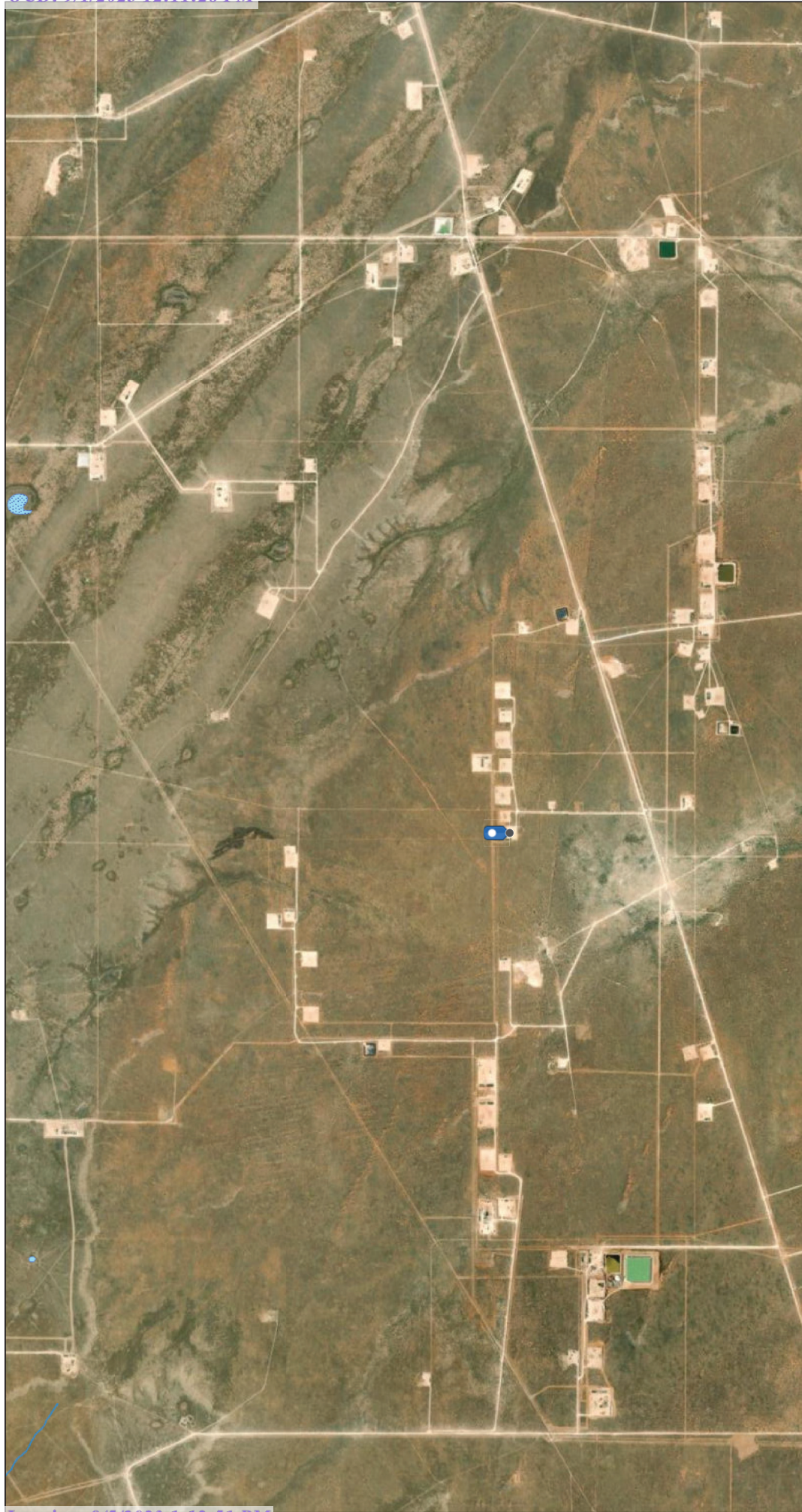


103°33'48"W 32°27'8"N

1:6,000

Feet
0 250 500 1,000 1,500 2,000

OCD Waterbodies Map



7/26/2023, 3:33:09 PM

- OSW Water Bodys
- OSE Probable Playas
- OSE Streams

1:36,112

0 0.38 0.75 1 1.5 mi
0 0.5 1 2 km

Esri, HERE, Garmin, Maxar, NM OSE

OCD Karst Potential Map



7/26/2023, 3:29:51 PM

Karst Occurrence Potential

Low

BLM, OCD, New Mexico Tech, Maxar, Microsoft, Esri,
HERE, Garmin, IPC



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 Number	POD Sub-Code	basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	Distance	Depth Well	Depth Water	Water Column
CP 01349 POD1	CP	LE		2	3	1	27	21S	33E	634782	3591569	440	1188	572	616
CP 01357 POD1	CP	LE		4	3	1	27	21S	33E	634782	3591347	638	1286	578	708

Average Depth to Water: **575 feet**

Minimum Depth: **572 feet**

Maximum Depth: **578 feet**

Record Count: 2

UTMNAD83 Radius Search (in meters):

Easting (X): 634543.1

Northing (Y): 3591939.34

Radius: 800

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.

8/21/23 12:30 PM

Page 1 of 1

WATER COLUMN/ AVERAGE
DEPTH TO WATER

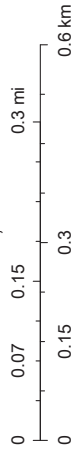
OCD Groundwater Wells (USGS)



8/21/2023, 1:29:05 PM

▲ USGS Historical GW Wells

1:9,028



USGS, Esri, HERE, Garmin, iPC, Maxar

APPENDIX C

Regulatory Correspondence

OCD Permitting

Home Operator Data Action Status Action Search Results Action Status Item Details

[IM-SD] Incident File Support Doc (ENV) (IM-BNF) Application

Submission Information

Submission ID:	205966	Districts:	Hobbs
Operator:	[229137] COG OPERATING LLC	Counties:	Lea
Description:	COG OPERATING LLC [229137] PYGMY 27 STATE COM #001H nOY1821448734 {Discovery: 07/30/2018, Closure Not Approved, Oil Release, Private}		
Status:	REJECTED		
Status Date:	04/11/2023		
References (2):	30-025-40352, nOY1821448734		

Forms

Attachments: [Support Doc](#)

Questions

This submission type does not have questions, at this time.

Acknowledgments

This submission type does not have acknowledgments, at this time.

Comments

No comments found for this submission.

Conditions

No conditions found for this submission.

Reasons

Summary:

bhall (4/11/2023), The area of the "overspray" must meet the requirements all of 19.15.29 NMAC. HA-1B has not been fully delineated.

bhall (4/11/2023), Per the conditions of approval for the initial C-141, a liner inspection needs to be performed. Pictures and an affirmation that the liner has and will contain liquids will need to be included in the report.

bhall (4/11/2023), 1RP-5143 closed. Refer to incident #NOY1821448734 in all future communication.

SIGN-IN HELP

Searches Operator Data Hearing Fee Application

New Mexico Energy, Minerals and Natural Resources Department | Copyright 2012
1220 South St. Francis Drive | Santa Fe, NM 87505 | P: (505) 476-3200 | F: (505) 476-3220

EMNRD Home OCD Main Page OCD Rules Help

From: Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>
Sent: Friday, July 21, 2023 2:09 PM
To: Abbott, Sam <Sam.Abbott@tetrattech.com>
Cc: Cantu Garcia, Moises H <Moises.H.CantuGarcia@conocophillips.com>; Llull, Christian <Christian.Llull@tetrattech.com>; Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>; Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>; Wells, Shelly, EMNRD <Shelly.Wells@emnrd.nm.gov>
Subject: RE: [EXTERNAL] Extension Request - Application ID 205966 (Incident ID nOY1821448734)

⚠ **CAUTION:** This email originated from an external sender. Verify the source before opening links or attachments. ⚠

Sam,

The extension request for **nOY1821448734** is denied as COPC did not provide a showing of good cause to the division.

This application was rejected on 4/11/2023 and the first notification OCD had received that Charles Beauvais has taken another role within ConocoPhillips and was no longer the individual associated COP/COG Sites between (2015-2018) was on 4/12/2023. The OCD provided notice for the Conoco/COG sites via Charles as directed by Gustavo Frejervay on November 9, 2022. Additionally, any application submitted through OCD Permitting can be viewed by clicking on "Action Status" under the "Operator Data" drop down menu. The Action ID are hyperlinks, and any conditions of approvals or reasons for rejections will be displayed. Alternatively, Operators can also see approved documents in the incident files, while looking at the Incident details information.

This incident was included in an Agreed Compliance Order-Releases (ACO-R) between COG Operating LLC (Concho) and the NMOCD signed on November 20 and 26, 2018. However, Pursuant to Section 4 of the Order "This Order shall expire when the Responsible Party has submitted characterization plans/remediation plans with proposed timeframes for all ongoing corrective actions/remediations identified in Exhibit "A" to the OCD personnel identified 'in Exhibit "B" by the dates specified in Exhibit "B". "

The ACO was drafted to allow COPC additional time to submit site characterization and Remediation

plans at a different pace than what was required by the rule. The longest work plan phase submission being 6-18 months (~June 2020) Those plans have been reviewed and either denied or accepted. Therefore, those sites are no longer under an ACO as the agreements have been met and they need to meet the requirements of any conditions of approvals or reasons for rejections. This was communicated to Mrs. Jacqui Harris of COPC on June 16, 2023.

This incident is considered out of compliance and a completed C-141 will need to be submitted through the OCD Permitting website as soon as possible. Pursuant to 19.15.29.15 any responsible party who does not comply with 19.15.29 NMAC are subject to compliance and enforcement pursuant to 19.15.5 NMAC.

Please Include this e-mail correspondence in the remediation and/or closure report when submitting to the OCD Permitting website.

Thank you,

Brittany Hall • Environmental Specialist
Environmental Bureau Projects Group
EMNRD - Oil Conservation Division
1000 Rio Brazos Road | Aztec, NM 87110
505.517.5333 | Brittany.Hall@emnrd.nm.gov
<http://www.emnrd.nm.gov/oed/>

From: Wells, Shelly, EMNRD <Shelly.Wells@emnrd.nm.gov>
Sent: Wednesday, July 19, 2023 3:19 PM
To: Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>
Cc: Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>
Subject: FW: [EXTERNAL] Extension Request - Application ID 205966 (Incident ID nOY1821448734)

From: Abbott, Sam <Sam.Abbott@tetrattech.com>
Sent: Wednesday, July 19, 2023 2:55 PM
To: Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>
Cc: Cantu Garcia, Moises H <Moises.H.CantuGarcia@conocophillips.com>; Llull, Christian <Christian.Llull@tetrattech.com>
Subject: [EXTERNAL] Extension Request - Application ID 205966 (Incident ID nOY1821448734)

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To Whom it May Concern,

On behalf of ConocoPhillips, Tetra Tech is requesting a 90-day extension (until October 9, 2023) to

complete additional assessment activities and associated reporting for the Pygmy 27 State #001H Release site (**nOY1821448734**).

NMOCD rejected the submitted Work Plan for incident ID (n#) **nOY1821448734** for the following reasons:

"The area of the "overspray" must meet the requirements all of 19.15.29 NMAC. HA-1B has not been fully delineated. Per the conditions of approval for the initial C-141, a liner inspection needs to be performed. Pictures and an affirmation that the liner has and will continue to contain liquids will need to be included in the report. 1RP-5143 closed. Refer to incident #NOY1821448734 in all future communication. Submit a complete report though the OCD Permitting website by 7/11/2023."

This incident is included in an Agreed Compliance Order-Releases (ACO-R) between COG Operating LLC (Concho) and the NMOCD signed on November 20 and 26, 2018, respectively. Tetra Tech received correspondence regarding the subject line incident on July 5, 2023. After an extensive review of the NMOCD online imaging files, it appears that the NMOCD determination for this release incident may have been inadvertently routed to ConocoPhillips individuals no longer associated with the ACO list management.

Tetra Tech and ConocoPhillips have initiated scheduling additional assessment and liner inspection activities to meet the requirements of 19.15.29 NMAC and the conditions of the Work Plan rejection, summarized above. The additional 90 days will allow adequate time for assessment and evaluation of the incident site. A complete report will be submitted through the OCD Permitting website by the requested extension date of October 9, 2023.

Please let me know if you have any questions or concerns.

Thank you in advance.

Sam

Samantha Abbott, PG | Project Manager

Direct Mobile +1 (512) 739-7874 | Business +1 (512) 338-1667 | Sam.Abbott@tetrattech.com

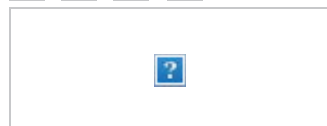
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From: Abbott, Sam <Sam.Abbott@tetrattech.com>

Sent: Thursday, August 3, 2023 12:57:12 PM

To: 'Enviro, OCD, EMNRD' <ocd.enviro@state.nm.us>

Cc: Brittany.Hall@emnrd.nm.gov <Brittany.Hall@emnrd.nm.gov>; Llull, Christian <Christian.Llull@tetrattech.com>; Chavira, Lisbeth <LISBETH.CHAVIRA@tetrattech.com>; Poole, Nicholas <NICHOLAS.POOLE@tetrattech.com>; Cantu Garcia, Moises H <Moises.H.CantuGarcia@conocophillips.com>

Subject: Incident ID: nOY1821448734 - Liner Inspection

Incident ID (n#) **nOY1821448734** (Pygmy 27 State #001H)

To whom it may concern,

In accordance with Subsection A of 19.15.29.11 NMAC, the responsible party must verbally notify the appropriate division district office prior to conducting the liner inspection.

Thus, on behalf of ConocoPhillips for the above referenced incident, Tetra Tech is duly providing this communication which serves as notification that a liner inspection will be conducted at this site on August 8, 2023.

Samantha Abbott, PG | Project Manager

Direct Mobile +1 (512) 739-7874 | Business +1 (512) 338-1667 | Sam.Abbott@tetrattech.com

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APPENDIX D

Laboratory Analytical Data



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

August 14, 2023

SAM ABBOTT

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: PYGMY 27 STATE #001H RELEASE

Enclosed are the results of analyses for samples received by the laboratory on 08/08/23 10:57.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-22-15. 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 style with a large, stylized 'C' and 'K'.

Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

TETRA TECH
 SAM ABBOTT
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	08/08/2023	Sampling Date:	08/08/2023
Reported:	08/14/2023	Sampling Type:	Soil
Project Name:	PYGMY 27 STATE #001H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03182	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

Sample ID: AH - 23 - 1 (0-1') (H234235-01)

BTEX 8021B		mg/kg		Analyzed By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/10/2023	ND	2.06	103	2.00	1.44	
Toluene*	<0.050	0.050	08/10/2023	ND	1.97	98.3	2.00	1.99	
Ethylbenzene*	<0.050	0.050	08/10/2023	ND	1.97	98.7	2.00	1.28	
Total Xylenes*	<0.150	0.150	08/10/2023	ND	5.84	97.4	6.00	2.40	
Total BTEX	<0.300	0.300	08/10/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 111 % 71.5-134

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	08/09/2023	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	08/09/2023	ND	167	83.7	200	5.49	
DRO >C10-C28*	<10.0	10.0	08/09/2023	ND	187	93.7	200	4.06	
EXT DRO >C28-C36	<10.0	10.0	08/09/2023	ND					

Surrogate: 1-Chlorooctane 115 % 48.2-134

Surrogate: 1-Chlorooctadecane 133 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

TETRA TECH
 SAM ABBOTT
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	08/08/2023	Sampling Date:	08/08/2023
Reported:	08/14/2023	Sampling Type:	Soil
Project Name:	PYGMY 27 STATE #001H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03182	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

Sample ID: AH - 23 - 1 (2'-3') (H234235-02)

BTEx 8021B		mg/kg		Analyzed By: JH/						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	08/10/2023	ND	2.06	103	2.00	1.44		
Toluene*	<0.050	0.050	08/10/2023	ND	1.97	98.3	2.00	1.99		
Ethylbenzene*	<0.050	0.050	08/10/2023	ND	1.97	98.7	2.00	1.28		
Total Xylenes*	<0.150	0.150	08/10/2023	ND	5.84	97.4	6.00	2.40		
Total BTEX	<0.300	0.300	08/10/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 110 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	08/09/2023	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	08/09/2023	ND	167	83.7	200	5.49	
DRO >C10-C28*	<10.0	10.0	08/09/2023	ND	187	93.7	200	4.06	
EXT DRO >C28-C36	<10.0	10.0	08/09/2023	ND					

Surrogate: 1-Chlorooctane 123 % 48.2-134

Surrogate: 1-Chlorooctadecane 143 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

TETRA TECH
 SAM ABBOTT
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	08/08/2023	Sampling Date:	08/08/2023
Reported:	08/14/2023	Sampling Type:	Soil
Project Name:	PYGMY 27 STATE #001H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03182	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

Sample ID: AH - 23 - 2 (0-1') (H234235-03)

BTX 8021B		mg/kg		Analyzed By: JH/						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	08/10/2023	ND	2.06	103	2.00	1.44		
Toluene*	<0.050	0.050	08/10/2023	ND	1.97	98.3	2.00	1.99		
Ethylbenzene*	<0.050	0.050	08/10/2023	ND	1.97	98.7	2.00	1.28		
Total Xylenes*	<0.150	0.150	08/10/2023	ND	5.84	97.4	6.00	2.40		
Total BTX	<0.300	0.300	08/10/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 110 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	16.0	16.0	08/09/2023	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	08/09/2023	ND	167	83.7	200	5.49	
DRO >C10-C28*	<10.0	10.0	08/09/2023	ND	187	93.7	200	4.06	
EXT DRO >C28-C36	<10.0	10.0	08/09/2023	ND					

Surrogate: 1-Chlorooctane 112 % 48.2-134

Surrogate: 1-Chlorooctadecane 130 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

TETRA TECH
 SAM ABBOTT
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	08/08/2023	Sampling Date:	08/08/2023
Reported:	08/14/2023	Sampling Type:	Soil
Project Name:	PYGMY 27 STATE #001H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03182	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

Sample ID: AH - 23 - 3 (0-1') (H234235-04)

BTEx 8021B		mg/kg		Analyzed By: JH/						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	08/10/2023	ND	2.06	103	2.00	1.44		
Toluene*	<0.050	0.050	08/10/2023	ND	1.97	98.3	2.00	1.99		
Ethylbenzene*	<0.050	0.050	08/10/2023	ND	1.97	98.7	2.00	1.28		
Total Xylenes*	<0.150	0.150	08/10/2023	ND	5.84	97.4	6.00	2.40		
Total BTEX	<0.300	0.300	08/10/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 112 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	08/09/2023	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	08/09/2023	ND	167	83.7	200	5.49	
DRO >C10-C28*	<10.0	10.0	08/09/2023	ND	187	93.7	200	4.06	
EXT DRO >C28-C36	<10.0	10.0	08/09/2023	ND					

Surrogate: 1-Chlorooctane 108 % 48.2-134

Surrogate: 1-Chlorooctadecane 125 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

TETRA TECH
 SAM ABBOTT
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	08/08/2023	Sampling Date:	08/08/2023
Reported:	08/14/2023	Sampling Type:	Soil
Project Name:	PYGMY 27 STATE #001H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03182	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

Sample ID: AH - 23 - 4 (0-1') (H234235-05)

BTEx 8021B		mg/kg		Analyzed By: JH/						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	08/10/2023	ND	2.06	103	2.00	1.44		
Toluene*	<0.050	0.050	08/10/2023	ND	1.97	98.3	2.00	1.99		
Ethylbenzene*	<0.050	0.050	08/10/2023	ND	1.97	98.7	2.00	1.28		
Total Xylenes*	<0.150	0.150	08/10/2023	ND	5.84	97.4	6.00	2.40		
Total BTEX	<0.300	0.300	08/10/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 110 % 71.5-134

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	08/09/2023	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	08/09/2023	ND	167	83.7	200	5.49	
DRO >C10-C28*	<10.0	10.0	08/09/2023	ND	187	93.7	200	4.06	
EXT DRO >C28-C36	<10.0	10.0	08/09/2023	ND					

Surrogate: 1-Chlorooctane 107 % 48.2-134

Surrogate: 1-Chlorooctadecane 124 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

TETRA TECH
 SAM ABBOTT
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	08/08/2023	Sampling Date:	08/08/2023
Reported:	08/14/2023	Sampling Type:	Soil
Project Name:	PYGMY 27 STATE #001H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03182	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

Sample ID: AH - 23 - 5 (0-1') (H234235-06)

BTEx 8021B		mg/kg		Analyzed By: JH/						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	08/10/2023	ND	2.06	103	2.00	1.44		
Toluene*	<0.050	0.050	08/10/2023	ND	1.97	98.3	2.00	1.99		
Ethylbenzene*	<0.050	0.050	08/10/2023	ND	1.97	98.7	2.00	1.28		
Total Xylenes*	<0.150	0.150	08/10/2023	ND	5.84	97.4	6.00	2.40		
Total BTEX	<0.300	0.300	08/10/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 112 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	16.0	16.0	08/09/2023	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	08/09/2023	ND	167	83.7	200	5.49	
DRO >C10-C28*	<10.0	10.0	08/09/2023	ND	187	93.7	200	4.06	
EXT DRO >C28-C36	<10.0	10.0	08/09/2023	ND					

Surrogate: 1-Chlorooctane 111 % 48.2-134

Surrogate: 1-Chlorooctadecane 129 % 49.1-148

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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



Company Name: Tech Tech
Project Manager: Sam Abbott

BILLS TO

ANALYSIS REQUEST

Page 9 of 9

† Cardinal cannot accept verbal changes. Please email changes to celey.keene@cardinallabsnm.com

APPENDIX E

Photographic Documentation



TETRA TECH, INC. PROJECT NO. 212C-MD-03182	DESCRIPTION	Site Signage and location information; PYGMY 27 State #1H	1
	SITE NAME	Pygmy 27 State #001H Release	8/14/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03182	DESCRIPTION	View east-southeast. Lined containment area with caliche.	2
	SITE NAME	Pygmy 27 State #001H Release	8/08/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03182	DESCRIPTION	View south. Liner integrity intact.	3
	SITE NAME	Pygmy 27 State #001H Release	8/10/2023



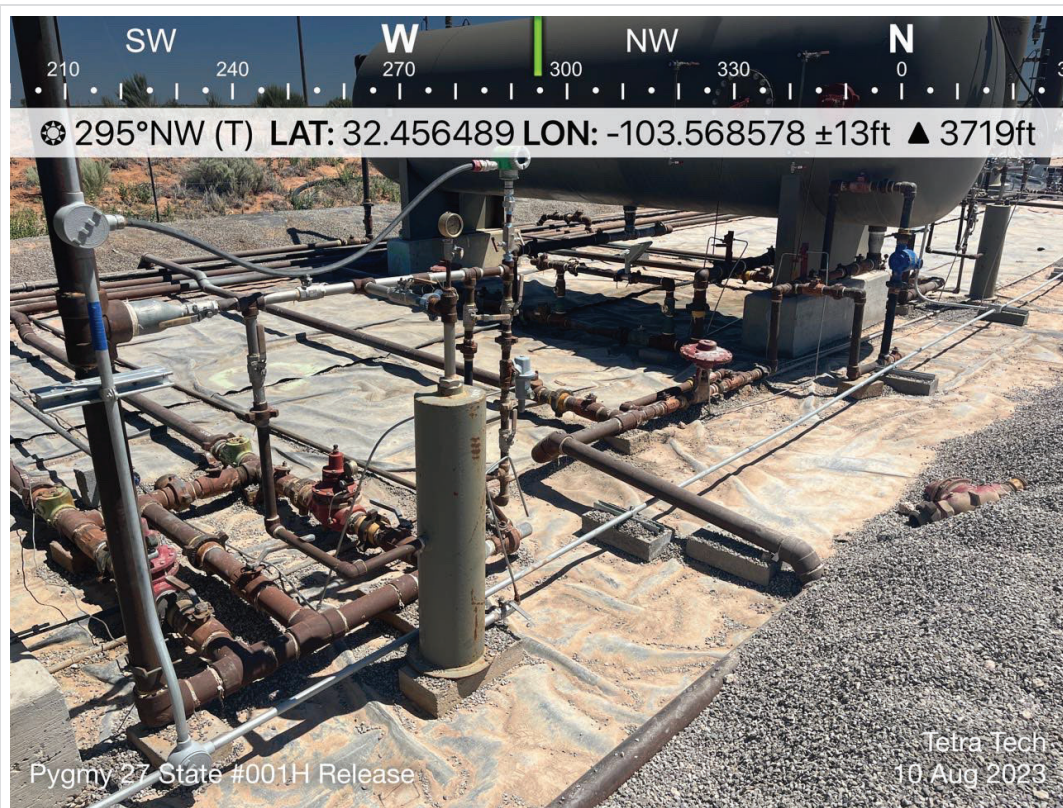
TETRA TECH, INC. PROJECT NO. 212C-MD-03182	DESCRIPTION	View north-northwest. Liner integrity intact.	4
	SITE NAME	Pygmy 27 State #001H Release	8/11/2023



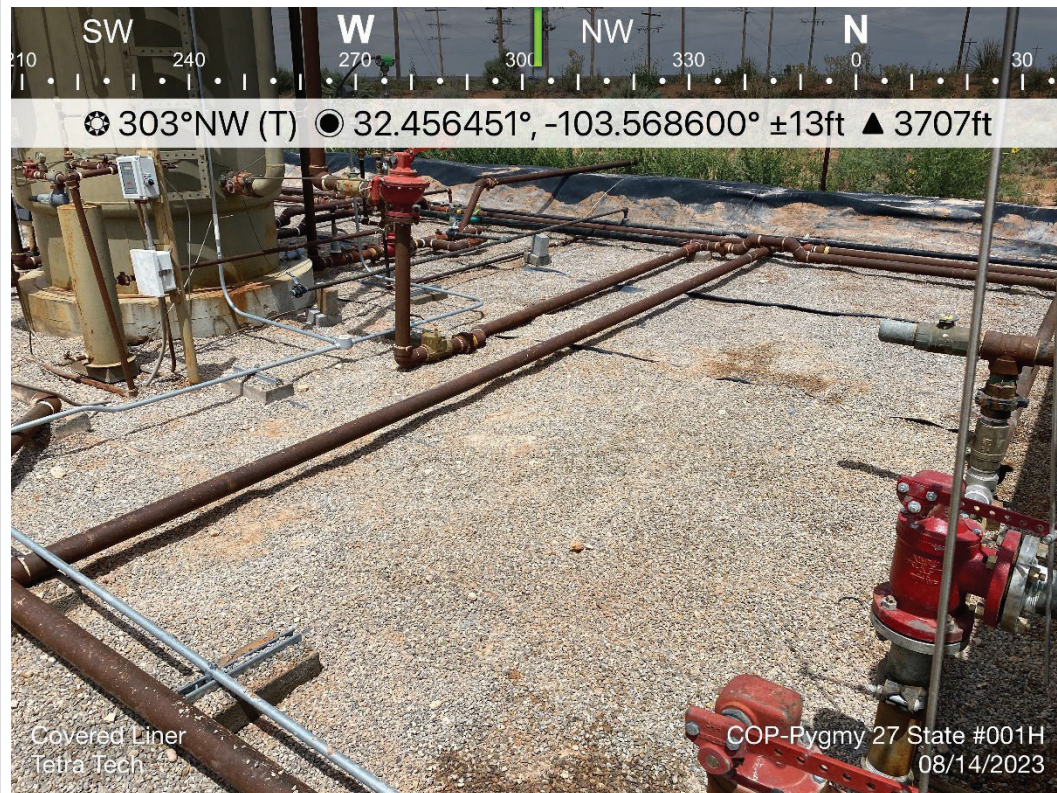
TETRA TECH, INC. PROJECT NO. 212C-MD-03182	DESCRIPTION	View south-southwest. Liner integrity intact.	5
	SITE NAME	Pygmy 27 State #001H Release	8/11/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03182	DESCRIPTION	View east-southeast. Lined containment area.	6
	SITE NAME	Pygmy 27 State #001H Release	8/10/2023



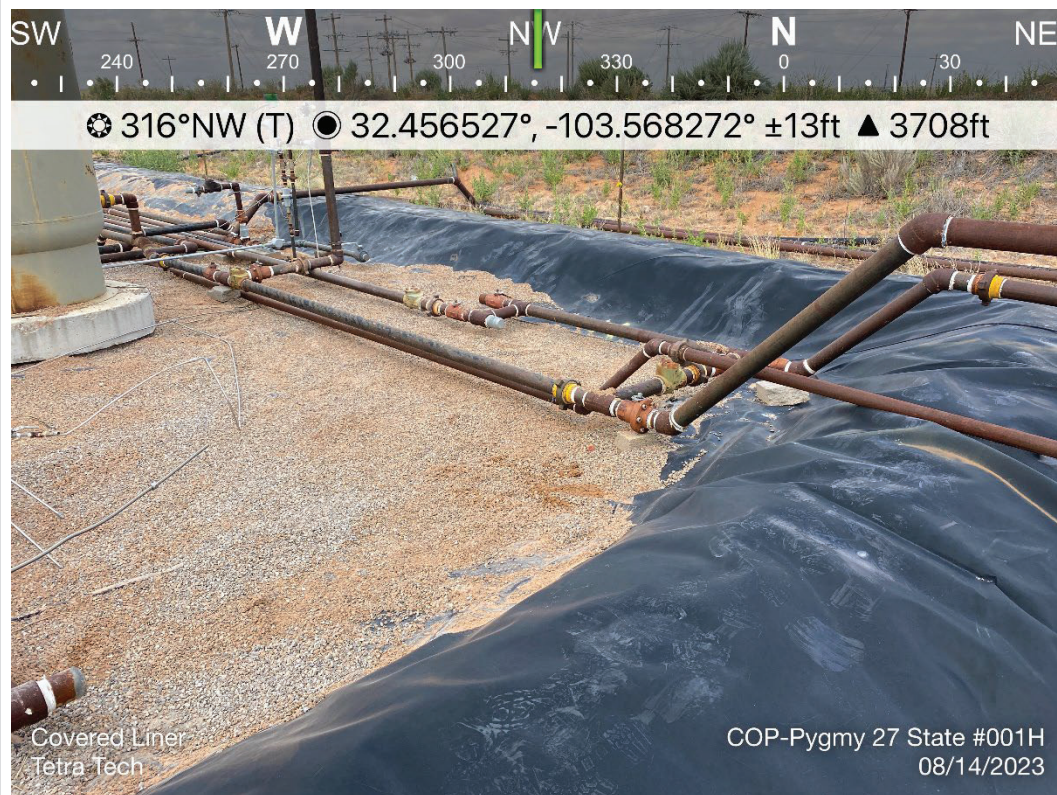
TETRA TECH, INC. PROJECT NO. 212C-MD-03182	DESCRIPTION	View east-northeast. Liner integrity intact.	7
	SITE NAME	Pygmy 27 State #001H Release	8/10/2023



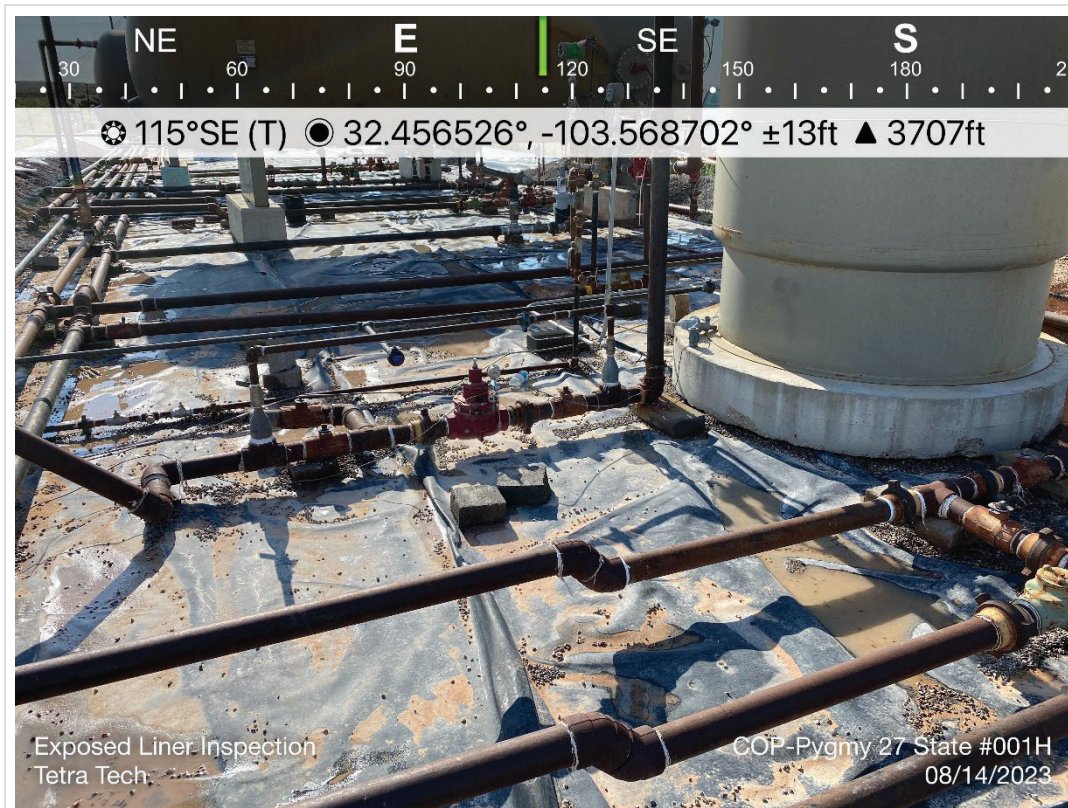
TETRA TECH, INC. PROJECT NO. 212C-MD-03182	DESCRIPTION	View west-northwest. Lined containment area with caliche prior to removal.	8
	SITE NAME	Pygmy 27 State #001H Release	8/14/2023



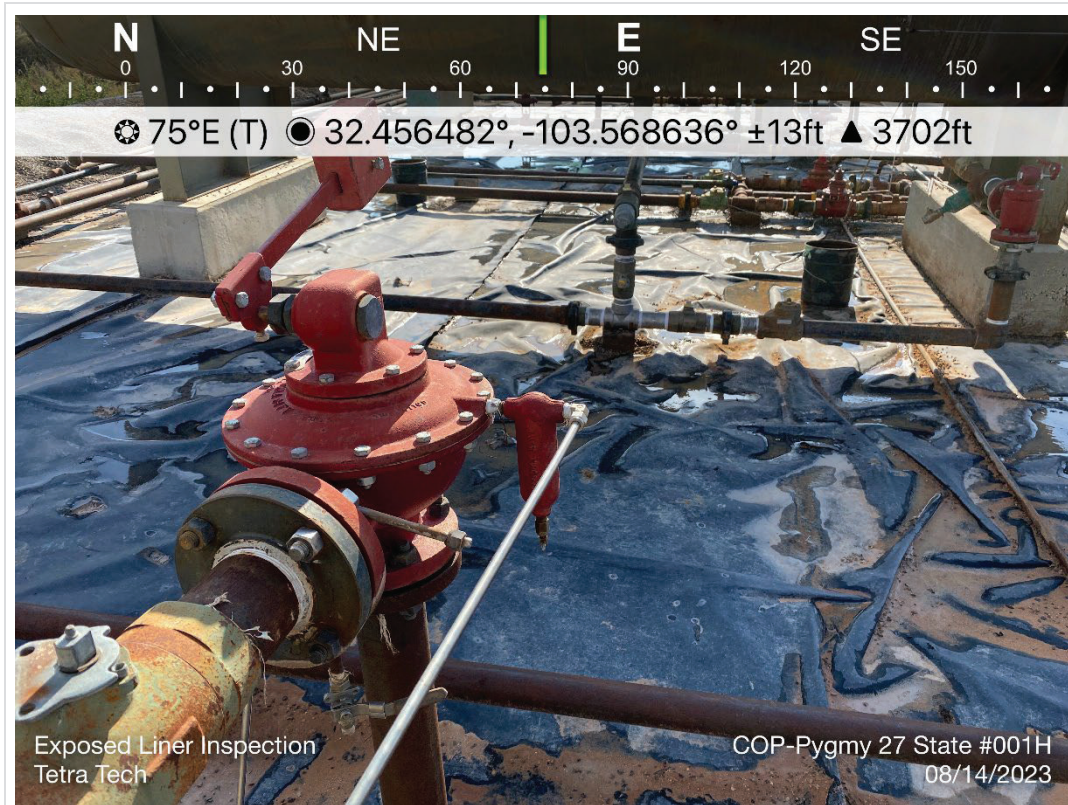
TETRA TECH, INC. PROJECT NO. 212C-MD-03182	DESCRIPTION	View east-northeast. Lined containment area with caliche prior to removal.	9
	SITE NAME	Pygmy 27 State #001H Release	8/14/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03182	DESCRIPTION	View northwest. Lined containment area with caliche prior to removal.	10
	SITE NAME	Pygmy 27 State #001H Release	8/14/2023



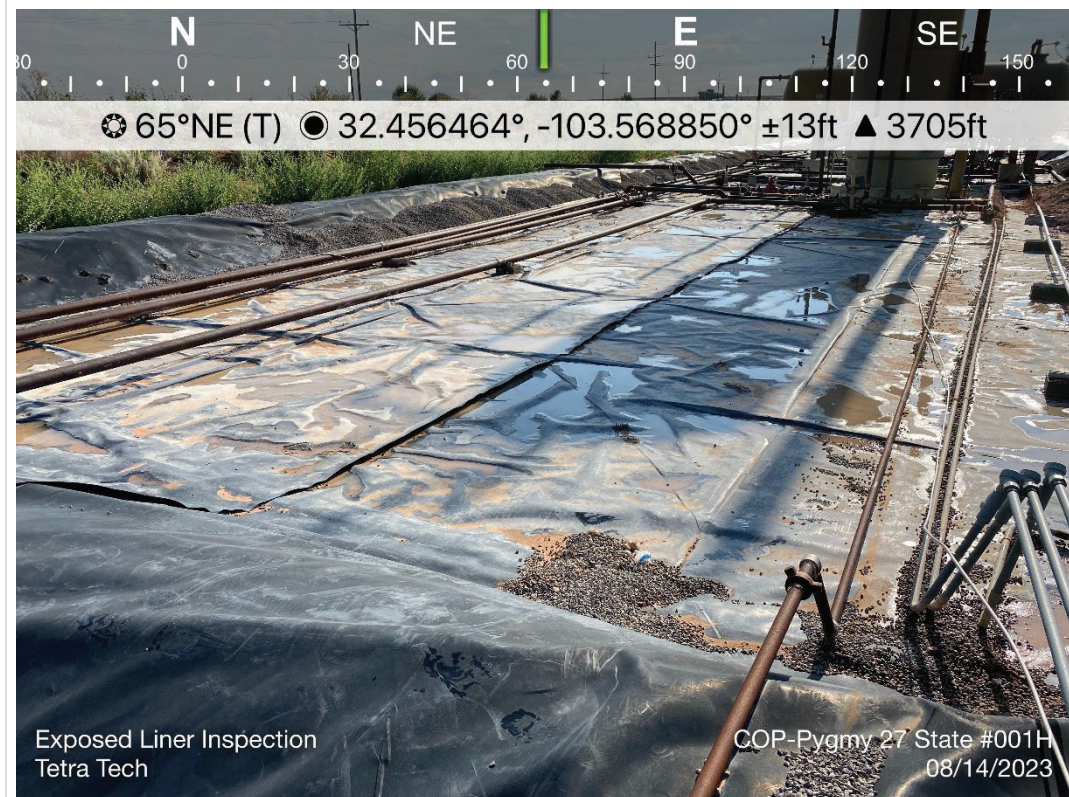
TETRA TECH, INC. PROJECT NO. 212C-MD-03182	DESCRIPTION	Liner integrity intact at release point. Standing water from recent rainfall in area.	11
	SITE NAME	Pygmny 27 State #001H Release	8/11/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03182	DESCRIPTION	Liner integrity intact at release point. Standing water from recent rainfall in area.	12
	SITE NAME	Pygmny 27 State #001H Release	8/14/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03182	DESCRIPTION	Liner integrity intact at release point. Standing water from recent rainfall in area.	13
	SITE NAME	Pygmy 27 State #001H Release	8/14/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03182	DESCRIPTION	Liner integrity intact. Standing water from recent rainfall in area.	14
	SITE NAME	Pygmy 27 State #001H Release	8/14/2023

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 261419

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 261419
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
bhall	Closure approved. Site will need to meet all the requirements of 19.15.29.13 NMAC at time of plugging and abandonment or major facility reconstruction, whichever comes first.	9/5/2023