



December 5, 2023

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

**Re: REVISED  
C-141 Closure Addendum  
ConocoPhillips (Heritage COG Operating, LLC)  
Condor State #001H Release  
Unit Letter D, Section 20, Township 18 South, Range 35 East  
Lea County, New Mexico  
Incident ID# NJXK1519633884**

Sir or Madam:

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips Company (ConocoPhillips) to evaluate documentation associated with a historical release and address the comments provided by the New Mexico Oil Conservation Division (NMOCD) for the incident associated with the Condor State #001H release site. At the time of the release incident, the site was a COG Operating, LLC asset.

## BACKGROUND

According to the State of New Mexico C-141 Initial (and Final) Report, the release was discovered on June 20, 2015. Approximately 15 barrels (bbls) of produced water and 3 bbls of oil were reported released due to a hole in the fire tube of the heater treater. A vacuum truck was dispatched to recover any standing fluids, recovering around 13 bbls of produced water and 1 bbls of oil.

It appears that, from review of available NMOCD imaging files, the incident was wholly contained within a lined containment area in 2015, and an initial and final C-141 was submitted to the NMOCD on February 29, 2016. The NMOCD approved this C-141 on July 15, 2015, and assigned the Incident ID NJXK1606034056 (1RP-4194). The C-141 form is included in Attachment A.

A site characterization was performed and no sinkholes, residences, schools, hospitals, institutions, churches, springs, private domestic water wells, stream bodies, springs, playa lakes, 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 United States Geological Survey (USGS) groundwater well search through the New Mexico Oil Conservation Division (NMOCD) mapping system, there are no active water wells within a ½-mile (800-meter) radius of the Site. According to the NMOSE, there is one well within 1.35 miles (2163 meters) with a total depth to water of 142 feet. The site characterization data is included in Attachment B.

## NMOCD REGULATORY STATUS

As mentioned, according to the final C-141, the release was reportedly contained within the lined bermed area. The facility was reported as cleaned, repaired, and put back into service. However, although the final C-141 was submitted (and approved) the incident remains open in the NMOCD imaging record.

Tetra Tech

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

Tel 432.682.4559

Fax 432.682.3946

www.tetrattech.com

December 5, 2023  
C-141 Closure Addendum

ConocoPhillips

The initial and final C-141 was dated July 4, 2015, received on July 15, 2015, and subsequently approved on the same day. Although the final was approved, the conditions of approval state that geotagged photos were required at the Site.

## 2023 VISUAL SITE INSPECTION

Based on the conditions of approval, Tetra Tech mobilized to the site on November 29, 2023, to conduct a visual site inspection and to collect geotagged photographs per NMOCD directives. There is no requirement to delineate or remediate at the facility, as the incident occurred in 2015 and has closure approved in 2015.

Tetra Tech personnel were able to identify the heater treater as presented in Figure 3. The secondary containment is made up of earthen berms approximately 2 feet tall with an intact polyethylene liner. The readily observable exposed areas of the liner were visually inspected. The liner was intact and appeared to have had the ability to contain the leak in question. As mentioned, the release was reported as having been contained within a lined bermed area, and, as documented in the C-141, initial response efforts were successful in recovering 14 bbls of released fluids (approximate 80% recovery). The liner extended up and over the 2-foot-tall earthen berm and was anchored on the exterior side. Photographic documentation is presented in Attachment C.

## CONCLUSION

The final C-141 was submitted in 2015, was subsequently approved, however the incident has remained open. ConocoPhillips respectfully requests that the NMOCD update the regulatory status of this incident and grant closure of the release based on the provided, requested information enclosed in this report.

If you have any questions regarding this information, please call me at (512) 596-8201 or Christian at (512) 288-6281.

Sincerely,  
**Tetra Tech, Inc.**



Lisbeth Chavira  
Staff Geoscientist



Christian M. Llull, P.G.  
Program Manager

cc:  
Mr. Moises Cantu Garcia, GPBU - ConocoPhillips

December 5, 2023  
C-141 Closure Addendum

ConocoPhillips

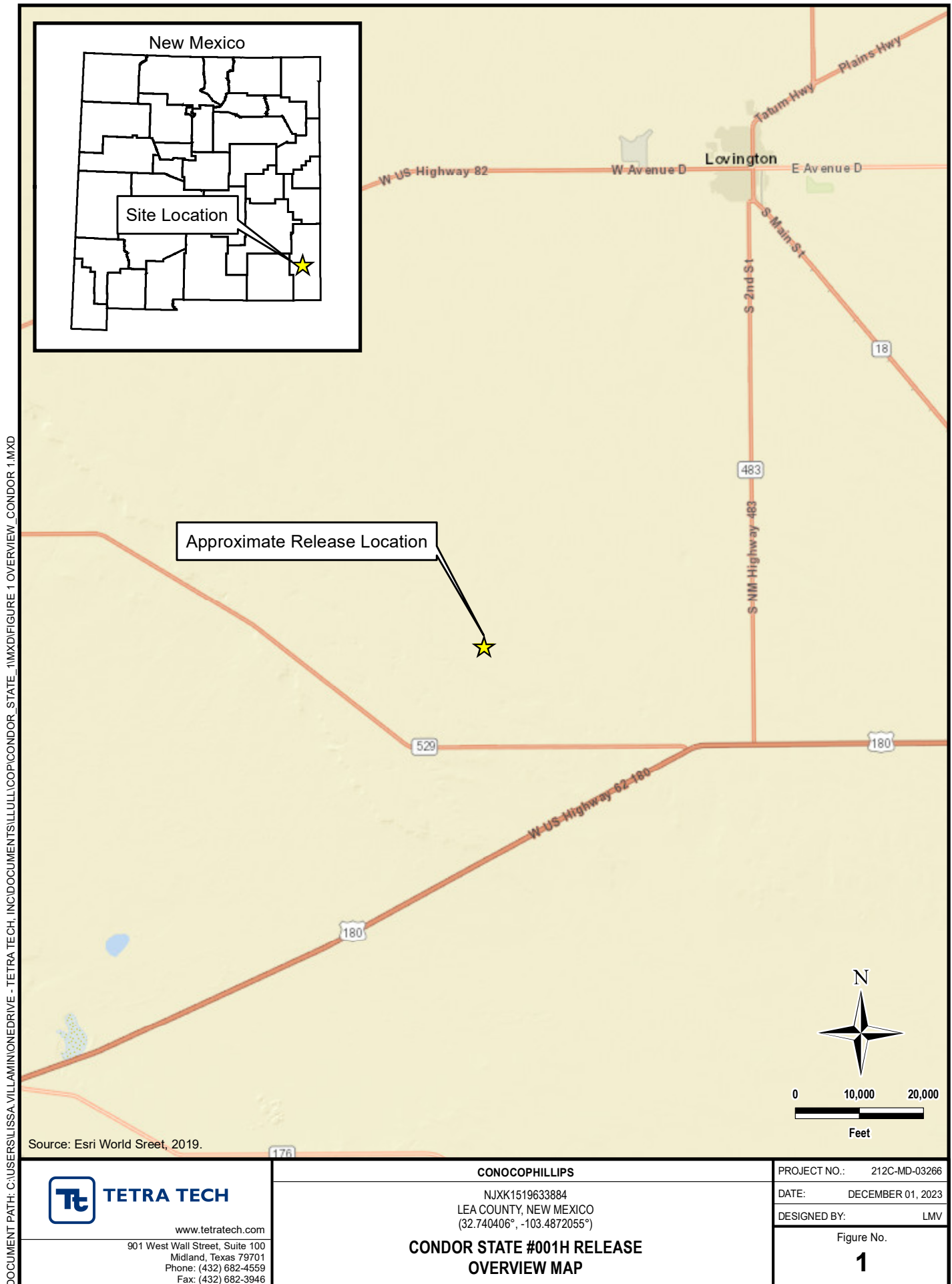
## LIST OF ATTACHMENTS

Figure 1 – Overview Map  
Figure 2 – Topographic Map  
Figure 3 – Approximate Release Point and Site Features

Attachment A – C-141 Initial and Final  
Attachment B – Site Characterization  
Attachment C – Photographic Documentation

## **FIGURES**





DOCUMENT PATH: C:\USERS\ISSA.VILLAMONEDRIVE - TETRA TECH, INC\DOCUMENTS\ILLUSTRATIONS\CONDOR STATE - 1\MXDFigure 2 TOPO - CONDOR 1.MXD

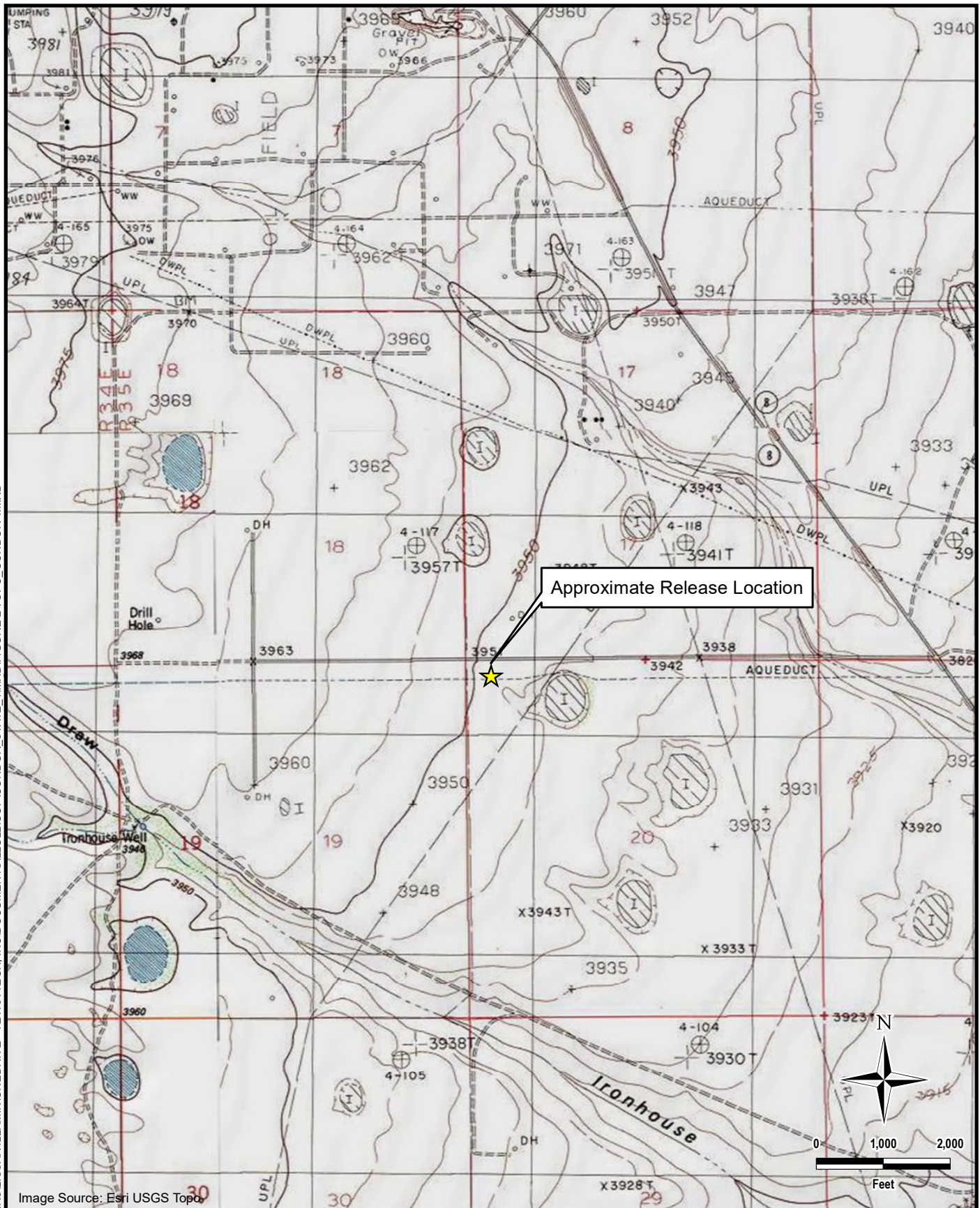


Image Source: Esri USGS Topo

**TETRA TECH**

www.tetrattech.com

901 West Wall Street, Suite 100  
Midland, Texas 79701  
Phone: (432) 682-4559  
Fax: (432) 682-3946

**CONOCOPHILLIPS**

NJXK1519633884  
LEA COUNTY, NEW MEXICO  
(32.740406°, -103.4872055°)

**CONDOR STATE #001H RELEASE  
TOPOGRAPHIC MAP**

PROJECT NO.: 212C-MD-03296

DATE: DECEMBER 01, 2023

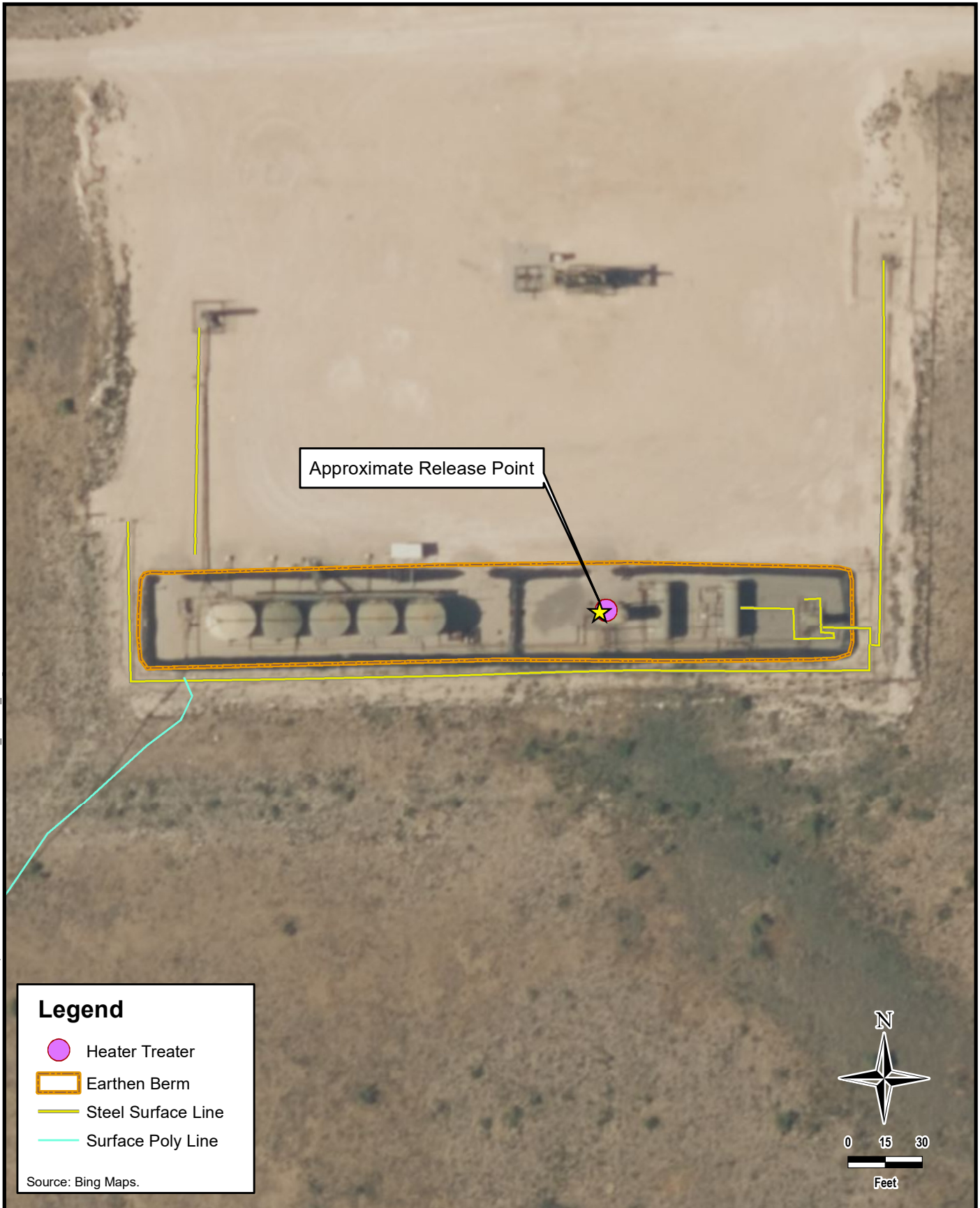
DESIGNED BY: LMV

Figure No.





**2**



DOCUMENT PATH: C:\USERS\LISSA.VILLAMINIONEDRIVE - TETRA TECH, INC\DOCUMENTS\ILLU\COPI\CONDOR - STATE\_1\MXD\FIGURE 3 APPROX RELEASE PT & FEATURES 1.MXD



### Legend

-  Heater Treater
-  Earthen Berm
-  Steel Surface Line
-  Surface Poly Line

Source: Bing Maps.



**TETRA TECH**

[www.tetratech.com](http://www.tetratech.com)

901 West Wall Street, Suite 100  
Midland, Texas 79701  
Phone: (432) 682-4559  
Fax: (432) 682-3946

**CONOCOPHILLIPS**

NJXK1519633884  
LEA COUNTY, NEW MEXICO  
(32.740406°, -103.4872055°)

**CONDOR STATE #001H RELEASE  
APPROXIMATE RELEASE POINT AND SITE FEATURES**

PROJECT NO.: 212C-MD-03296

DATE: DECEMBER 01, 2023

DESIGNED BY: LMV

Figure No.

**3**

## **ATTACHMENT A INITIAL AND FINAL C-141**

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. 432-230-0077
Facility Name: Condor State #1H	Facility Type: Battery

Surface Owner: State	Mineral Owner:	API No. 30-025-40814
----------------------	----------------	----------------------

### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
D	20	18S	35E	60	North	330	West	Lea

Latitude 32.740406 Longitude -103.4872055

### NATURE OF RELEASE

Type of Release: Oil & Water	Volume of Release: 3 bbls oil ; 15 bbls PW	Volume Recovered: 1 bbls oil ; 13 bbls PW
Source of Release: Hole in Fire tube	Date and Hour of Occurrence: 6/20/2015 8:00 am	Date and Hour of Discovery: 6/20/2015 8:00 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.\*

**RECEIVED**

By OCD District 1 at 9:22 am, Jul 15, 2015



Describe Cause of Problem and Remedial Action Taken.\*

This release was caused by a hole in the fire tube of the heater treater. A vacuum truck was dispatched to recover any standing fluids.

Describe Area Affected and Cleanup Action Taken.\*

This release occurred within the lined bermed area. The facility was cleaned, repaired and put back into service.

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: Amanda Trujillo	Approved by Environmental Specialist: 	
Title: Senior Environmental Coordinator	Approval Date: 07/15/2015	Expiration Date: ///
E-mail Address: <a href="mailto:atrujillo@concho.com">atrujillo@concho.com</a>	Conditions of Approval: Geotagged photos of remediation required.	Attached <input type="checkbox"/> ogrid 229137 IRP-3730
Date: July 4, 2015 Phone: 575-748-6940		

\* Attach Additional Sheets If Necessary

nJXK1519633884

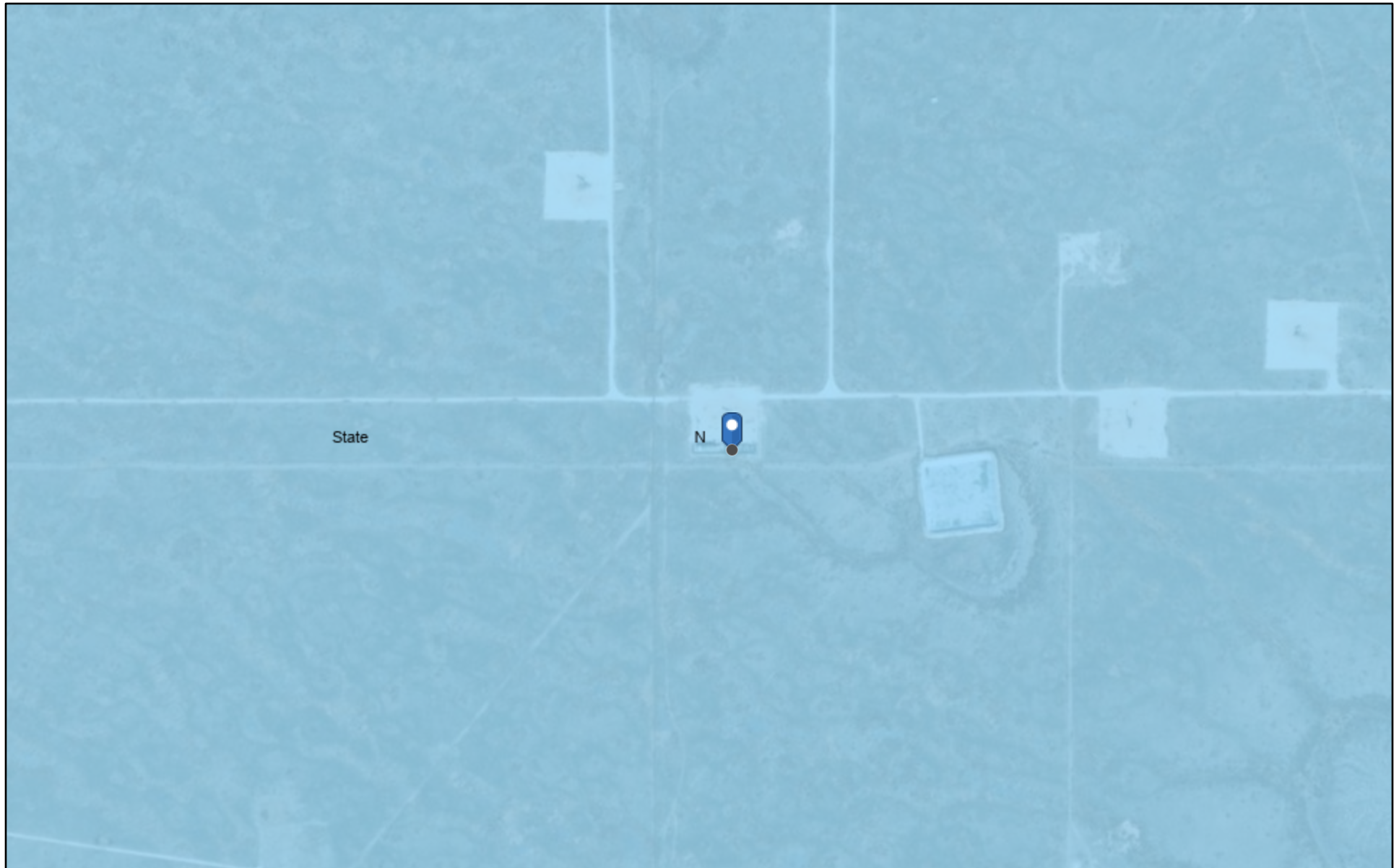
pJXK1519634124



## **ATTACHMENT B SITE CHARACTERIZATION**



# OCD Land Ownership



12/4/2023, 1:07:52 PM

Mineral Ownership

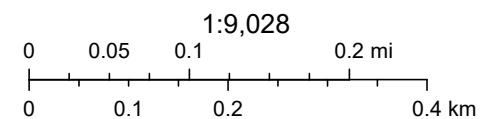
Land Ownership



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



S



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






# New Mexico Office of the State Engineer

## Point of Diversion Summary

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest)

(NAD83 UTM in meters)

<b>Well Tag</b>	<b>POD Number</b>	<b>Q64</b>	<b>Q16</b>	<b>Q4</b>	<b>Sec</b>	<b>Tws</b>	<b>Rng</b>	<b>X</b>	<b>Y</b>
L	02349 POD3	4	1	4	07	18S	35E	641225	3625573 

x

**Driller License:** 368      **Driller Company:** EXPIRED LAYNE CHRISTENSEN COMPANY

**Driller Name:** HAUSLADEN, JAMES M.

<b>Drill Start Date:</b> 03/14/2013	<b>Drill Finish Date:</b> 03/21/2013	<b>Plug Date:</b>
<b>Log File Date:</b> 09/19/2014	<b>PCW Rcv Date:</b> 04/28/2016	<b>Source:</b> Artesian
<b>Pump Type:</b> SUBMER	<b>Pipe Discharge Size:</b> 3	<b>Estimated Yield:</b>
<b>Casing Size:</b> 12.75	<b>Depth Well:</b> 220 feet	<b>Depth Water:</b> 142 feet

x

<b>Meter Number:</b> 18458	<b>Meter Make:</b> OCTAVE
<b>Meter Serial Number:</b> 221105273	<b>Meter Multiplier:</b> 1.0000
<b>Number of Dials:</b> 9	<b>Meter Type:</b> Diversion
<b>Unit of Measure:</b> Gallons	<b>Return Flow Percent:</b>
<b>Usage Multiplier:</b>	<b>Reading Frequency:</b> Monthly

x

### Meter Readings (in Acre-Feet)

Read Date	Year	Mtr Reading	Flag	Rdr	Comment	Mtr Amount Online
10/31/2019	2019	24665060	A	RPT		0
12/31/2019	2019	25313518	A	dd		1.990
01/31/2020	2020	25763081	A	dd		1.380
03/31/2020	2020	26571977	A	dd		2.482
04/30/2020	2020	26773472	A	dd		0.618
05/31/2020	2020	26773472	A	dd		0
08/31/2020	2020	27642326	A	dd		2.666
09/30/2020	2020	28127114	A	dd		1.488
10/31/2020	2020	28454739	A	dd		1.005
11/30/2020	2020	28939362	A	dd		1.487
12/31/2020	2020	28939362	A	dd		0
03/31/2021	2021	30836965	A	dd		5.824
04/30/2021	2021	31297637	A	dd		1.414
05/31/2021	2021	31461086	A	dd		0.502
06/30/2021	2021	31650061	A	dd		0.580
07/31/2021	2021	32176494	A	dd		1.616
08/31/2021	2021	1090539	R	dd	Meter Rollover	211.489
09/30/2021	2021	5565092	A	dd		13.732
10/31/2021	2021	10951840	A	dd		16.531
11/30/2021	2021	16018978	A	dd		15.550
12/31/2021	2021	21129820	A	dd		15.685
01/31/2022	2022	26149979	A	dd		15.406
02/28/2022	2022	30640991	A	dd		13.782
03/31/2022	2022	35690003	A	dd		15.495

04/30/2022	2022	40116476	A	dd	13.584
05/31/2022	2022	45206657	A	dd	15.621
06/30/2022	2022	49372351	A	dd	12.784
08/31/2022	2022	59344547	A	dd	30.604
09/30/2022	2022	64091881	A	dd	14.569
10/31/2022	2022	68846727	A	dd	14.592
11/30/2022	2022	72939867	A	dd	12.561
12/31/2022	2022	77834110	A	dd	15.020
01/12/2023	2022	79916925	A	dd	6.392
01/13/2023	2023	0	A	dd	0
02/28/2023	2023	7335898	A	RPT	22.513
03/31/2023	2023	12320757	A	RPT	15.298
04/30/2023	2023	17123689	A	jb	14.740
05/31/2023	2023	21776469	A	jb	14.279
07/31/2023	2023	31013398	A	jb	28.347
08/31/2023	2023	35600064	A	jb	14.076

---

x

<b>**YTD Meter Amounts:</b>	<b>Year</b>	<b>Amount</b>
	2019	1.990
	2020	11.126
	2021	282.923
	2022	180.410
	2023	109.253

---

x

---

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.

---

12/4/23 11:35 AM

POINT OF DIVERSION SUMMARY

# National Flood Hazard Layer FIRMette



103°29'32"W 32°44'39"N



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

1:6,000

103°28'55"W 32°44'9"N

Released to Imaging: 12/22/2023 8:56:28 AM

Basemap Imagery Source: USGS National Map 2023

## Legend

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

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		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		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
		Area of Undetermined Flood Hazard Zone D
GENERAL STRUCTURES		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
		17.5 Cross Sections with 1% Annual Chance Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped



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

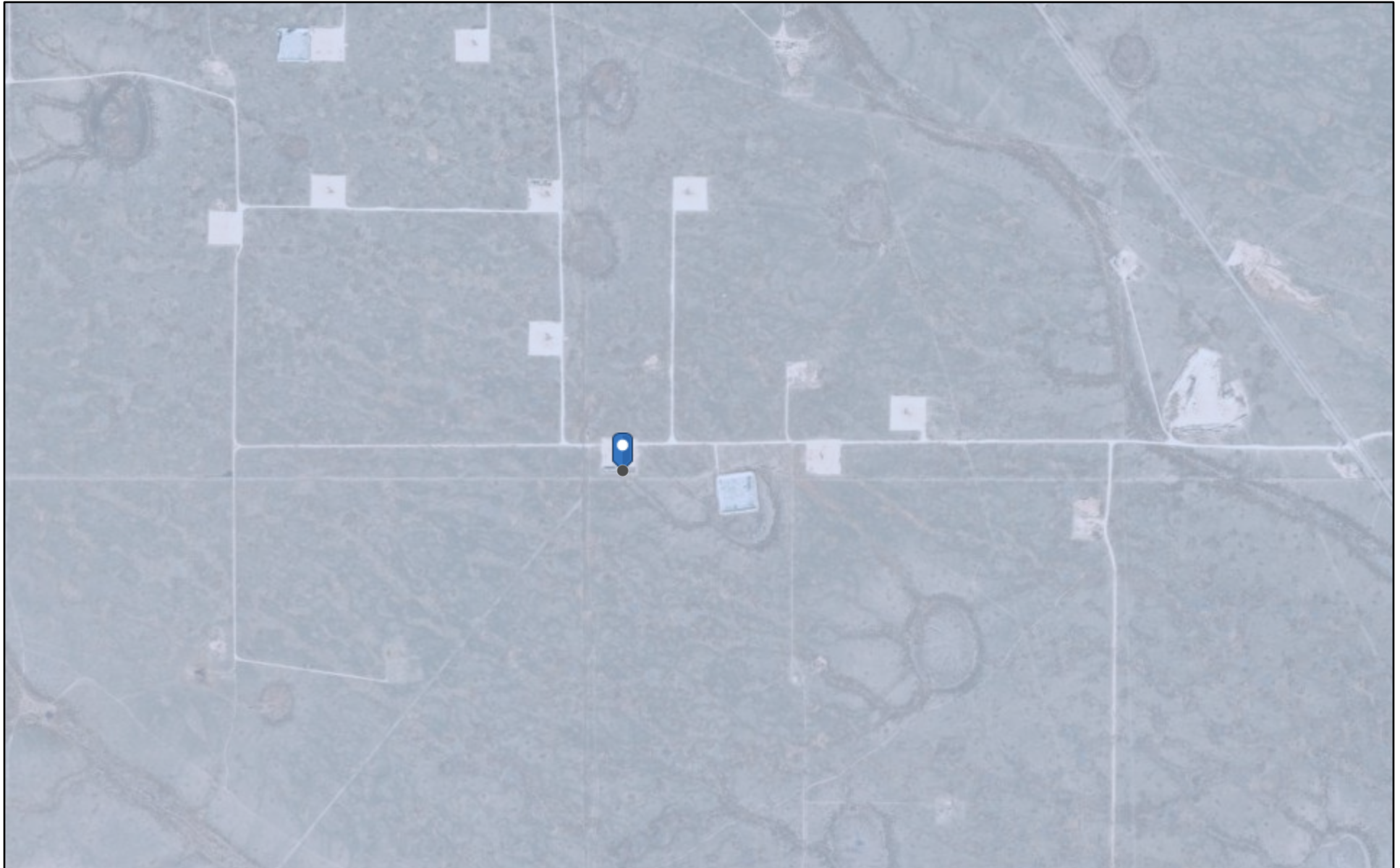
This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 12/4/2023 at 1:41 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.



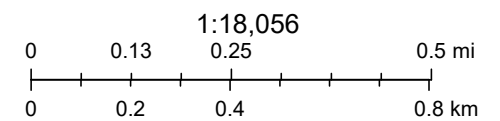
## OCD Karst Areas



12/4/2023, 1:00:39 PM

Karst Occurrence Potential

 Low



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

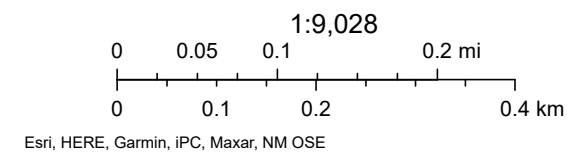


## OCD Waterbodies



12/4/2023, 1:02:17 PM

 OSW Water Bodys





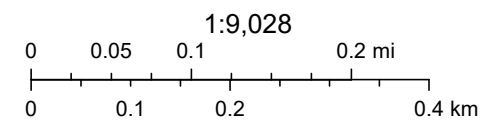
## OCD Wells



12/4/2023, 1:06:07 PM

OSE Water PODs

● Plugged



USGS, Esri, HERE, Garmin, iPC, Maxar

## **ATTACHMENT C PHOTOGRAPHIC DOCUMENTATION**



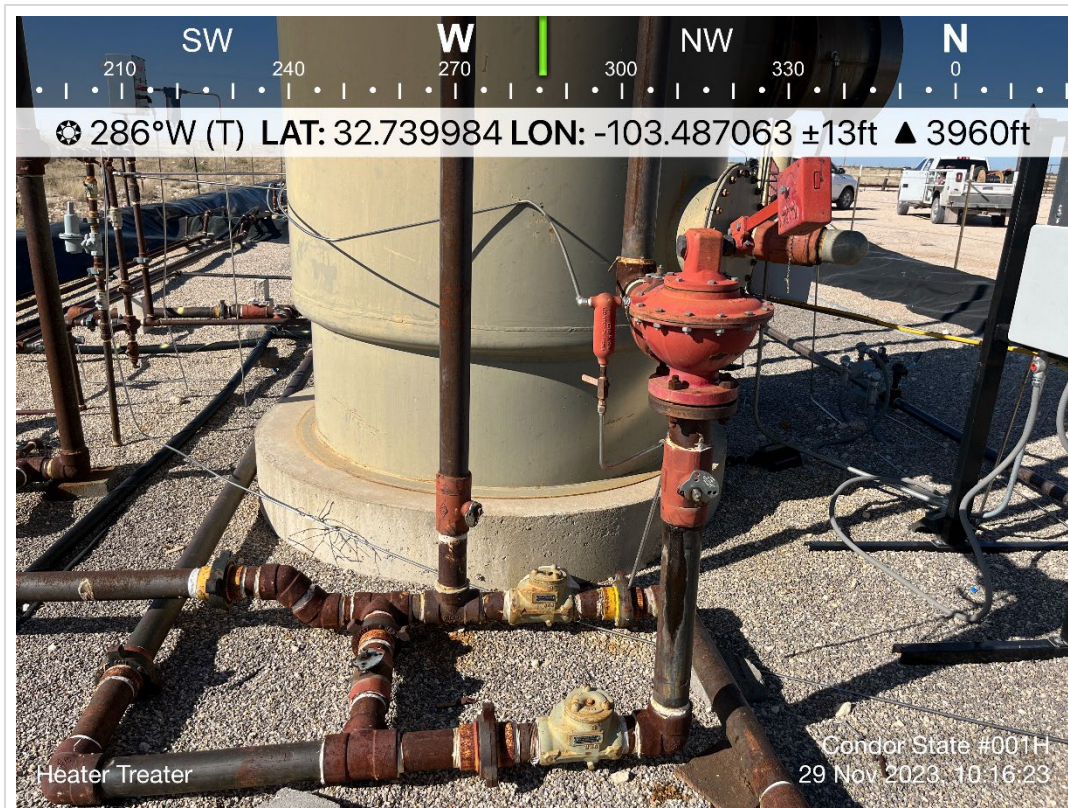


TETRA TECH, INC. PROJECT NO. 212C-MD-03296	DESCRIPTION	View south of site signage. Condor State #1H.	1
	SITE NAME	CONDOR STATE #001H Release	11/29/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03296	DESCRIPTION	View southeast of approximate release area inside lined berm. Heater treater and surface pipelines.	2
	SITE NAME	CONDOR STATE #001H Release	11/29/2023





TETRA TECH, INC. PROJECT NO. 212C-MD-03296	DESCRIPTION	View west-northwest of approximate release area near heater treater. Mass of surface pipelines.	3
	SITE NAME	CONDOR STATE #001H Release	11/29/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03296	DESCRIPTION	View north of approximate release area near heater treater. Mass of surface pipelines.	4
	SITE NAME	CONDOR STATE #001H Release	11/29/2023





TETRA TECH, INC. PROJECT NO. 212C-MD-03296	DESCRIPTION	View south approximate release area near heater treater. Mass of surface pipelines.	5
	SITE NAME	CONDOR STATE #001H Release	11/29/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03296	DESCRIPTION	View east-northeast of lined tank battery west of approximate release area.	6
	SITE NAME	CONDOR STATE #001H Release	11/29/2023





TETRA TECH, INC. PROJECT NO. 212C-MD-03296	DESCRIPTION	View west-southwest of lined tank battery west of approximate release area.	7
	SITE NAME	CONDOR STATE #001H Release	11/29/2023

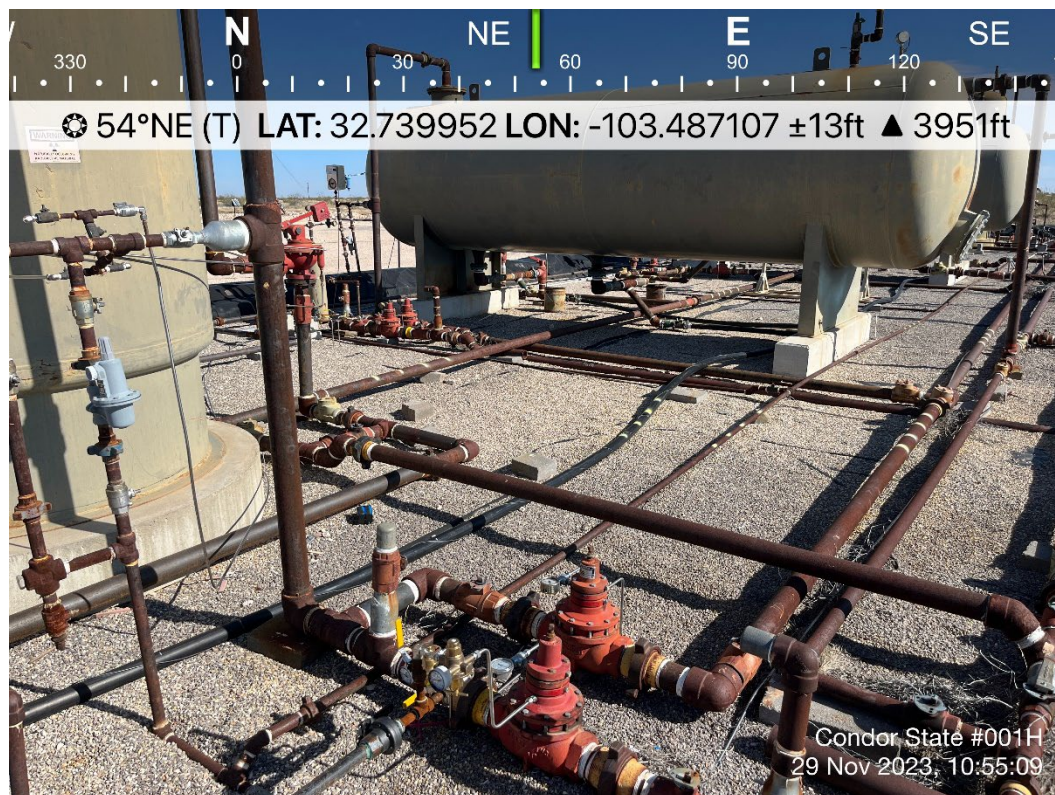


TETRA TECH, INC. PROJECT NO. 212C-MD-03296	DESCRIPTION	View south-southeast of lined tank battery west of approximate release area.	8
	SITE NAME	CONDOR STATE #001H Release	11/29/2023





TETRA TECH, INC. PROJECT NO. 212C-MD-03296	DESCRIPTION	View north of approximate release area inside lined berm near heater treater. Mass of surface pipelines.	9
	SITE NAME	CONDOR STATE #001H Release	11/29/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03296	DESCRIPTION	View northeast of approximate release area inside lined berm near heater treater. Mass of surface pipelines.	10
	SITE NAME	CONDOR STATE #001H Release	11/29/2023





TETRA TECH, INC. PROJECT NO. 212C-MD-03296	DESCRIPTION	View north-northwest of approximate release area. Heater treater and surface pipelines.	11
	SITE NAME	CONDOR STATE #001H Release	11/29/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03296	DESCRIPTION	View northwest of approximate release area. Heater treater and surface pipelines.	12
	SITE NAME	CONDOR STATE #001H Release	11/29/2023

**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**

QUESTIONS

Action 291296

**QUESTIONS**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:	229137
	Action Number:	291296
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Prerequisites</b>	
Incident ID (n#)	nJXK1519633884
Incident Name	NJXK1519633884 CONDOR STATE #001H @ 30-025-40814
Incident Type	Oil Release
Incident Status	Remediation Closure Report Received
Incident Well	[30-025-40814] CONDOR STATE #001H

**Location of Release Source**

Please answer all the questions in this group.

Site Name	Condor State #001H
Date Release Discovered	06/20/2015
Surface Owner	State

**Incident Details**

Please answer all the questions in this group.

Incident Type	Oil Release
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

**Nature and Volume of Release**

Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.

Crude Oil Released (bbls) Details	Cause: Equipment Failure   Flow Line - Production   Crude Oil   Released: 3 BBL   Recovered: 1 BBL   Lost: 2 BBL.
Produced Water Released (bbls) Details	Cause: Equipment Failure   Flow Line - Production   Produced Water   Released: 15 BBL   Recovered: 13 BBL   Lost: 2 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	No
Condensate Released (bbls) Details	Cause: Equipment Failure   Tank (Any)   Condensate   Released: 0 BBL   Recovered: 0 BBL   Lost: 0 BBL.
Natural Gas Vented (Mcf) Details	Cause: Equipment Failure   Tank (Any)   Natural Gas Vented   Released: 0 Mcf   Recovered: 0 Mcf   Lost: 0 Mcf.
Natural Gas Flared (Mcf) Details	Cause: Equipment Failure   Tank (Any)   Natural Gas Flared   Released: 0 Mcf   Recovered: 0 Mcf   Lost: 0 Mcf.
Other Released Details	Cause: Equipment Failure   Tank (Any)   Produced Water   Released: 0 BBL   Recovered: 0 BBL   Lost: 0 BBL.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	The final C-141 was submitted in 2015, was subsequently approved, however the incident has remained open. ConocoPhillips respectfully requests that the NMOCD update the regulatory status of this incident and grant closure of the release based on the provided, requested information enclosed in this report.



**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**

QUESTIONS, Page 2

Action 291296

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:	229137
	Action Number:	291296
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Nature and Volume of Release (continued)</b>	
Is this a gas only submission (i.e. only significant Mcf values reported)	<b>No, according to supplied volumes this does not appear to be a "gas only" report.</b>
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	<b>No</b>
Reasons why this would be considered a submission for a notification of a major release	<i>Unavailable.</i>
<i>With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.</i>	

**Initial Response**

*The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury.*

The source of the release has been stopped	<b>True</b>
The impacted area has been secured to protect human health and the environment	<b>True</b>
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	<b>True</b>
All free liquids and recoverable materials have been removed and managed appropriately	<b>True</b>
If all the actions described above have not been undertaken, explain why	<i>Not answered.</i>

*Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.*

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.

I hereby agree and sign off to the above statement	Name: Christian LLuLL Title: Project Manager Email: christian.llull@tetrattech.com Date: 12/05/2023
--	--

**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**

QUESTIONS, Page 3

Action 291296

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:	229137
	Action Number:	291296
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS****Site Characterization**

Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). 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 in feet below ground surface (ft bgs)	Between 100 and 500 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
<b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>	
A continuously flowing watercourse or any other significant watercourse	Between 1000 (ft.) and ½ (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Greater than 5 (mi.)
Any other fresh water well or spring	Greater than 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Greater than 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Greater than 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

**Remediation Plan**

Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

Requesting a remediation plan approval with this submission	Yes
Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.	
On what estimated date will the remediation commence	07/04/2015
On what date will (or did) the final sampling or liner inspection occur	07/04/2015
On what date will (or was) the remediation complete(d)	07/04/2015
What is the estimated surface area (in square feet) that will be remediated	0
What is the estimated volume (in cubic yards) that will be remediated	0
These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.	
The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.	



**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**

QUESTIONS, Page 4

Action 291296

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:	229137
	Action Number:	291296
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS****Remediation Plan (continued)**

*Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.*

**This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:**

<i>(Select all answers below that apply.)</i>	
Is (or was) there affected material present needing to be removed	Yes
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	No

*Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.*

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.

I hereby agree and sign off to the above statement	Name: Christian LLuLL Title: Project Manager Email: christian.llull@tetrattech.com Date: 12/05/2023
--	--

*The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.*

**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**

QUESTIONS, Page 6

Action 291296

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:
	229137
	Action Number:
	291296
Action Type:	
[C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

**QUESTIONS**

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	291350
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	07/04/2015
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	5299

**Remediation Closure Request**

*Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.*

Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
What was the total surface area (in square feet) remediated	5299
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	Pre-2018 enactment of Spill Rule, no liner inspection was required.

*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 (in .pdf format) 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.*

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.

I hereby agree and sign off to the above statement	Name: Christian LLuLL Title: Project Manager Email: christian.llull@tetrattech.com Date: 12/05/2023
--	--

**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 291296

CONDITIONS

Operator:  COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:  229137
	Action Number:  291296
	Action Type:  [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
bhall	None	12/22/2023