



August 15, 2024

**New Mexico Oil Conservation Division**

New Mexico Energy, Minerals, and Natural Resources Department  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

**Re: Closure Request  
Talco 9 26 35 Fed 3H Battery  
Incident Number nAPP2418241081  
Lea County, New Mexico**

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of COG Operating, LLC (COG), has prepared this *Closure Request* to document the findings of a liner integrity inspection conducted at the Talco 9 26 35 Fed 3H Battery (Site) following a release of crude oil and produced water within a lined containment. Based on the liner integrity inspection activities, COG is submitting this *Closure Request*, describing assessment activities that have occurred and requesting no further action and closure for Incident Number nAPP2418241081.

**SITE DESCRIPTION AND RELEASE SUMMARY**

The Site is located in Unit G, Section 09, Township 26 South, Range 35 East, in Lea County, New Mexico (32.05837222°, -103.3691055°) and is associated with oil and gas exploration and production operations on private land.

On June 29, 2024, a hole in a firetube resulted in the release of approximately 29 barrels (bbls) of crude oil and 48 bbls of produced water into a lined containment. A vacuum truck was dispatched to the Site to recover free-standing fluids and approximately 29 bbls of crude oil and 47 bbls of produced water were recovered. Following the release, the firetube was isolated and repaired. COG reported the release to the New Mexico Oil Conservation Division (NMOCD) on a *Release Notification Form C-141* (Form C-141) on July 2, 2024. The release was assigned Incident Number nAPP2418241081.

**SITE CHARACTERIZATION AND CLOSURE CRITERIA**

The Site was characterized for applicability of Table I, Closure Criteria for Soils Impacted by a Release, of Title 19, Chapter 15, Part 29 (19.15.29) of the New Mexico Administrative Code (NMAC). Results from the characterization are summarized below and detailed in the NMOCD permitting portal Form C-141 Site Characterization section.

Depth to groundwater at the Site is estimated to be greater than 100 feet below ground surface (bgs) based on the nearest groundwater well data. The closest permitted groundwater well with depth to groundwater data is New Mexico Office of the State Engineer (NMOSE) well C-4601 POD 1, located approximately 1.5 miles northwest of the Site. The well was drilled to a depth of 101 feet bgs. A field geologist logged and described soils continuously. No moisture or groundwater was encountered during drilling activities. The borehole was left open for over 72 hours to allow for potential slow infill of ground water. After the 72-hour waiting period without observing groundwater, it was confirmed that

COG Operating LLC  
Closure Request  
Talco 9 26 35 Fed 3H Battery

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groundwater was greater than 101 feet bgs. All wells used for depth to groundwater determination are depicted on Figure 1 and the associated well records are included in Appendix A.

The closest continuously flowing or significant watercourse to the Site is a dry wash, located approximately 2,113 feet south of the Site. The Site is greater than 200 feet from a lakebed, sinkhole, or playa lake and greater than 300 feet from an occupied residence, school, hospital, institution, church, or wetland. The Site is greater than 1,000 feet to a freshwater well or spring and is not within a 100-year floodplain or overlying a subsurface mine. The Site is not underlain by unstable geology (low potential karst designation area). Potential Site receptors are identified in Figure 1.

Based on the results of the Site Characterization and the nearest well located greater than a half mile away, the following NMOCD Table I Closure Criteria (Closure Criteria) apply:

- Benzene: 10 milligrams per kilogram (mg/kg)
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX): 50 mg/kg
- Total petroleum hydrocarbons (TPH) 100 mg/kg
- Chloride: 600 mg/kg

## **LINER INTEGRITY INSPECTION ACTIVITIES**

A 48-hour advance notice of the liner inspection was submitted to the NMOCD on August 5, 2024. Prior to conducting the liner integrity inspection, COG operations power washed the liner to remove dirt and debris and recover any residual produced water. A liner integrity inspection was conducted by Ensolum personnel on August 8, 2024. Upon inspection, no rips, tears, holes, or damage was observed. The liner was determined to be sufficient, and all released fluids have been removed. Photographic documentation of the inspection is included in Appendix B.

## **CLOSURE REQUEST**

Liner integrity inspection activities were conducted following a release of produced water within a lined containment at the Site. A liner integrity inspection was conducted by Ensolum personnel on August 8, 2024. Upon inspection, no rips, tears, holes, or damage was observed, and the liner was determined to be sufficient. The release was contained laterally by the lined containment and the liner was performing as designed. Based on initial response efforts and the liner operating as designed, COG respectfully requests closure for Incident Number nAPP2418241081.

COG Operating LLC  
Closure Request  
Talco 9 26 35 Fed 3H Battery

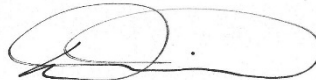
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If you have any questions or comments, please contact Mr. Daniel R. Moir at (303) 887-2946 or dmoir@ensolum.com.

Sincerely,  
**Ensolum, LLC**



David McInnis  
Project Geologist



Daniel R. Moir, PG (licensed in WY & TX)  
Senior Managing Geologist

Cc: Jacob Laird

Appendices:

Figure 1	Site Receptor Map
Figure 2	Release Map
Appendix A	Referenced Well Records
Appendix B	Photographic Log
Appendix C	NMOCD Correspondence





FIGURES

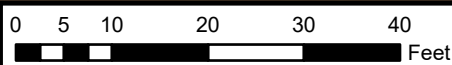
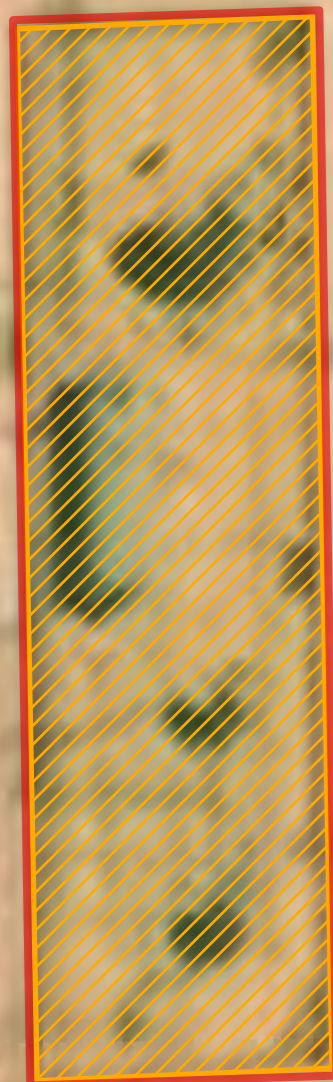






## Legend

-  Lined Containment
-  Release Extent



Sources: Environmental Systems Research Institute (ESRI)



## Release Extent Map

COG Operating, LLC  
Talco 9 26 35 Fed 3H Battery  
Incident Number: NAPP2418241081  
Unit G, Sec 09, T 26S, R 35E  
Lea County, New Mexico

**FIGURE**

**2**



## APPENDIX A

### Referenced Well Records

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# WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

[www.ose.state.nm.us](http://www.ose.state.nm.us)

OSE 011 APR 8 2022 PM 3:16

<b>1. GENERAL AND WELL LOCATION</b>	OSE POD NO. (WELL NO.) <b>POD1 (TW-1)</b>		WELL TAG ID NO.		OSE FILE NO(S). <b>C-4601</b>		
	WELL OWNER NAME(S) <b>Marathon Oil</b>				PHONE (OPTIONAL)		
	WELL OWNER MAILING ADDRESS <b>4111 S Tidwell Rd.</b>				CITY <b>Carlsbad</b>	STATE <b>NM</b>	ZIP <b>88220</b>
	WELL LOCATION (FROM GPS)	DEGREES <b>32</b>		MINUTES <b>3</b>	SECONDS <b>58</b>	* ACCURACY REQUIRED: ONE TENTH OF A SECOND * DATUM REQUIRED: WGS 84	
		LATITUDE <b>103</b>		LONGITUDE <b>23</b>	<b>33</b>		
DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS – PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE <b>SE SE Sw Sec. 05 T26S R35E</b>							

<b>2. DRILLING &amp; CASING INFORMATION</b>	LICENSE NO. <b>1249</b>		NAME OF LICENSED DRILLER <b>Jackie D. Atkins</b>			NAME OF WELL DRILLING COMPANY <b>Atkins Engineering Associates, Inc.</b>		
	DRILLING STARTED <b>3/31/2022</b>		DRILLING ENDED <b>3/31/2022</b>		DEPTH OF COMPLETED WELL (FT) <b>temporary well</b>	BORE HOLE DEPTH (FT) <b>±100.8</b>	DEPTH WATER FIRST ENCOUNTERED (FT) <b>n/a</b>	
	COMPLETED WELL IS: <input type="checkbox"/> ARTESIAN <input checked="" type="checkbox"/> DRY HOLE <input type="checkbox"/> SHALLOW (UNCONFINED)					STATIC WATER LEVEL IN COMPLETED WELL (FT) <b>n/a</b>	DATE STATIC MEASURED <b>4/6/2022</b>	
	DRILLING FLUID: <input type="checkbox"/> AIR <input type="checkbox"/> MUD ADDITIVES – SPECIFY:							
	DRILLING METHOD: <input type="checkbox"/> ROTARY <input type="checkbox"/> HAMMER <input type="checkbox"/> CABLE TOOL <input checked="" type="checkbox"/> OTHER – SPECIFY: <b>Hollow Stem Auger</b>						CHECK HERE IF PITLESS ADAPTER IS INSTALLED <input type="checkbox"/>	
	DEPTH (feet bgl)		BORE HOLE DIAM (inches)	CASING MATERIAL AND/OR GRADE (include each casing string, and note sections of screen)	CASING CONNECTION TYPE (add coupling diameter)	CASING INSIDE DIAM. (inches)	CASING WALL THICKNESS (inches)	SLOT SIZE (inches)
	FROM	TO						
0	100.8	±6.5	Boring	--	--	--	--	

<b>3. ANNULAR MATERIAL</b>	DEPTH (feet bgl)		BORE HOLE DIAM. (inches)	LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL	AMOUNT (cubic feet)	METHOD OF PLACEMENT
	FROM	TO				

FOR OSE INTERNAL USE

WR-20 WELL RECORD & LOG (Version 01/28/2022)

FILE NO. <b>C-4601-POD 1</b>	POD NO. <b>1</b>	TRN NO. <b>721041</b>
LOCATION <b>26.35.05.343</b>	WELL TAG ID NO. <b>---</b>	PAGE 1 OF 2



	DEPTH (feet bgl)		THICKNESS (feet)	COLOR AND TYPE OF MATERIAL ENCOUNTERED - INCLUDE WATER-BEARING CAVITIES OR FRACTURE ZONES (attach supplemental sheets to fully describe all units)	WATER BEARING? (YES / NO)	ESTIMATED YIELD FOR WATER- BEARING ZONES (gpm)	
	FROM	TO					
4. HYDROGEOLOGIC LOG OF WELL	0	4	4	Sand, medium/ fine grained poorly graded, Red	Y    ✓ N		
	4	19	15	Sand, medium/ fine grained poorly graded, Tan	Y    ✓ N		
	19	101	82	Sand, medium/ fine grained poorly graded, Reddish Brown	Y    ✓ N		
					Y    N		
					Y    N		
					Y    N		
					Y    N		
					Y    N		
					Y    N		
					Y    N		
					Y    N		
					Y    N		
					Y    N		
					Y    N		
					Y    N		
					Y    N		
					Y    N		
					Y    N		
	METHOD USED TO ESTIMATE YIELD OF WATER-BEARING STRATA:					TOTAL ESTIMATED WELL YIELD (gpm):            0.00	
	<input type="checkbox"/> PUMP <input type="checkbox"/> AIR LIFT <input type="checkbox"/> BAILER <input type="checkbox"/> OTHER – SPECIFY:						

5. TEST; RIG SUPERVISION	WELL TEST	TEST RESULTS - ATTACH A COPY OF DATA COLLECTED DURING WELL TESTING, INCLUDING DISCHARGE METHOD, START TIME, END TIME, AND A TABLE SHOWING DISCHARGE AND DRAWDOWN OVER THE TESTING PERIOD.
	MISCELLANEOUS INFORMATION:	
	<div style="text-align: right; color: blue; font-style: italic;">USE OIT APR 8 2022 PM 3:15</div>	
PRINT NAME(S) OF DRILL RIG SUPERVISOR(S) THAT PROVIDED ONSITE SUPERVISION OF WELL CONSTRUCTION OTHER THAN LICENSEE: Shane Eldridge, Carmelo Trevino, Cameron Pruitt		

6. SIGNATURE	THE UNDERSIGNED HEREBY CERTIFIES THAT, TO THE BEST OF HIS OR HER KNOWLEDGE AND BELIEF, THE FOREGOING IS A TRUE AND CORRECT RECORD OF THE ABOVE DESCRIBED HOLE AND THAT HE OR SHE WILL FILE THIS WELL RECORD WITH THE STATE ENGINEER AND THE PERMIT HOLDER WITHIN 30 DAYS AFTER COMPLETION OF WELL DRILLING:	
	<div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div style="text-align: center;">             SIGNATURE OF DRILLER / PRINT SIGNEE NAME         </div> <div style="text-align: center;">           Jackie D. Atkins            DATE         </div> </div>	4/7/2022

FOR OSE INTERNAL USE

WR-20 WELL RECORD &amp; LOG (Version 01/28/2022)

FILE NO. <b>C-4601-POD 1</b>	POD NO. <b>1</b>	TRN NO. <b>721041</b>
LOCATION <b>26-35.05-343</b>	WELL TAG ID NO. <b>_____</b>	PAGE 2 OF 2

Mike A. Hamman, P.E.  
State Engineer



Roswell Office  
1900 WEST SECOND STREET  
ROS WELL, NM 88201

**STATE OF NEW MEXICO**  
**OFFICE OF THE STATE ENGINEER**

Trn Nbr: 721041  
File Nbr: C 04601  
Well File Nbr: C 04601 POD1

Apr. 08, 2022

MELODIE SANJARI  
MARATHON OIL  
4111 S TIDWELL RD  
CARLSBAD, NM 88220

Greetings:

The above numbered permit was issued in your name on 03/10/2022.

The Well Record was received in this office on 04/08/2022, stating that it had been completed on 03/31/2022, and was a dry well. The well is to be plugged according to 19.27.4.30 NMAC.

Please note that another well can be drilled under this permit if the well is completed and the well log filed on or before 03/10/2023.

If you have any questions, please feel free to contact us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Maret Amaral".

Maret Amaral  
(575) 622-6521

drywell



2904 W 2nd St.  
Roswell, NM 88201  
voice: 575.624.2420  
fax: 575.624.2421  
www.atkinseng.com

08/016/2021

DII-NMOSE  
1900 W 2<sup>nd</sup> Street  
Roswell, NM 88201

*Hand Delivered to the DII Office of the State Engineer*

Re: Well Record C-4601 Pod1

To whom it may concern:

Attached please find a well log & record and a plugging record, in duplicate, for a one (1) soil borings, C-4601 Pod1.

If you have any questions, please contact me at 575.499.9244 or [lucas@atkinseng.com](mailto:lucas@atkinseng.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Lucas Middleton". The signature is written in a cursive, flowing style.

Lucas Middleton

Enclosures: as noted above

OSE DII APR 8 2022 PM3:15



## APPENDIX B

### Photographic Log

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**Photographic Log**  
**COG Operating, LLC**  
**Talco 9 26 35 Fed 3H Battery**  
**nAPP2418241081**



Photograph: 1  
 Description: Location signage  
 View: West

Date: 8/8/2024



Photograph: 2  
 Description: Liner inspection activities, liner condition  
 View: South

Date: 8/8/2024



Photograph: 3  
 Description: Liner inspection activities, liner condition  
 View: South

Date: 8/8/2024



Photograph: 4  
 Description: Liner inspection activities, liner condition  
 View: Northwest

Date: 8/8/2024



## APPENDIX C

### NMOCD Correspondence

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**From:** [Laird, Jacob](#)  
**To:** [Dan Moir](#); [David Mcinnis](#)  
**Subject:** FW: [EXTERNAL]The Oil Conservation Division (OCD) has accepted the application, Application ID: 370399  
**Date:** Monday, August 5, 2024 6:34:05 PM

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[ \*\*EXTERNAL EMAIL\*\* ]

FYI for the liner inspection at the Talco 9-26-35 Fed 3H

I appreciate you,

**Jacob Laird** | Environmental Engineer, DBE | **ConocoPhillips**  
C: 575-703-5482

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**From:** OCDOnline@state.nm.us <OCDOnline@state.nm.us>  
**Sent:** Monday, August 5, 2024 10:31 AM  
**To:** Laird, Jacob <Jacob.Laird@conocophillips.com>  
**Subject:** [EXTERNAL]The Oil Conservation Division (OCD) has accepted the application, Application ID: 370399

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern (c/o Jacob Laird for COG OPERATING LLC),

The OCD has received the submitted *Notification for Liner Inspection for a Release* (C-141L), for incident ID (n#) nAPP2418241081.

The liner inspection is expected to take place:

**When:** 08/08/2024 @ 09:00

**Where:** G-09-26S-35E 0 FNL 0 FEL (32.05837222,-103.3691055)

**Additional Information:** [dmcinnis@ensolum.com](mailto:dmcinnis@ensolum.com)

**Additional Instructions:** Talco 9 26 35 Federal 3H Release (32.05837222, -103.3691055)

An OCD representative may be available onsite at the date and time reported. In the absence or presence of an OCD representative, liner inspection pursuant to 19.15.29.11.A(5)(a) NMAC is required. Should there be a change in the scheduled date and time of the sampling event, then another notification should be resubmitted through OCD permitting as soon as possible.

- **Failure to notify the OCD of liner inspections including any changes in date/time per the requirements of 19.15.29.11.A(5)(a)(ii) NMAC, may result in the inspection not being accepted.**

If you have any questions regarding this application, or don't know why you have received this email, please contact us.

**New Mexico Energy, Minerals and Natural Resources Department**  
1220 South St. Francis Drive  
Santa Fe, NM 87505



**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 375041

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:	229137
	Action Number:	375041
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2418241081
Incident Name	NAPP2418241081 TALCO 9 26 35 FED 3H BATTERY @ 0
Incident Type	Release Other
Incident Status	Remediation Closure Report Received
Incident Facility	[fAPP2203438309] Talco 9 26 35 Fed 3H - Battery

Location of Release Source	
Please answer all the questions in this group.	
Site Name	Talco 9 26 35 Fed 3H Battery
Date Release Discovered	06/30/2024
Surface Owner	Federal

Incident Details	
Please answer all the questions in this group.	
Incident Type	Release Other
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: Other   Other (Specify)   Crude Oil   Released: 29 BBL   Recovered: 29 BBL   Lost: 0 BBL.
Produced Water Released (bbls) Details	Cause: Other   Other (Specify)   Produced Water   Released: 48 BBL   Recovered: 47 BBL   Lost: 1 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.

**District I**

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**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 375041

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:	229137
	Action Number:	375041
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
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.	

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

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: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 07/02/2024
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**District I**

1625 N. French Dr., Hobbs, NM 88240  
Phone:(575) 393-6161 Fax:(575) 393-0720

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**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 375041

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:
	229137
	Action Number:
	375041
	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 500 and 1000 (ft.)
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	Between 1 and 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1 and 5 (mi.)
Any other fresh water well or spring	Between 1 and 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Between 1 and 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	None
A 100-year floodplain	Between 500 and 1000 (ft.)
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	08/08/2024
On what date will (or did) the final sampling or liner inspection occur	08/08/2024
On what date will (or was) the remediation complete(d)	08/08/2024
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**

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**District III**

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**District IV**

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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
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**Santa Fe, NM 87505**

QUESTIONS, Page 4

Action 375041

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 375041
	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:**

*(Select all answers below that apply.)*

Is (or was) there affected material present needing to be removed	No
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: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 08/19/2024
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*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.*



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QUESTIONS, Page 6

Action 375041

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:	229137
	Action Number:	375041
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Liner Inspection Information</b>	
Last liner inspection notification (C-141L) recorded	370399
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	08/08/2024
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	3370

**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	3542
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	A liner integrity inspection was conducted by Ensolum personnel on August 8, 2024. Upon inspection, no rips, tears, holes, or damage was observed. The liner was determined to be sufficient, and all released fluids have been removed.

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: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 08/19/2024
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CONDITIONS  
  
Action 375041

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 375041
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
rhamlet	We have received your Remediation Closure Report for Incident #NAPP2418241081 TALCO 9 26 35 FED 3H BATTERY, thank you. This Remediation Closure Report is approved.	9/6/2024