



February 21, 2025

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
Squints Federal 27M CTB
Incident Number nAPP2504930201
Lea County, New Mexico

To Whom It May Concern:

COG Operating, LLC, (COG), has prepared this *Closure Request* to document the findings of a liner integrity inspection conducted at the Squints Federal 27M CTB (Site) following the release of 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 nAPP2504930201

SITE DESCRIPTION AND RELEASE SUMMARY

The site is located in Unit M, Section 27, Township 22 South, Range 34 East, in Lea County, New Mexico (32.35712778, -103.4645278) and is associated with oil and gas exploration and production operations on state land managed by the New Mexico State Land Office (NMSLO).

On February 10, 2025, field personnel discovered that the mechanical seal on the water transfer pump had failed causing a release of approximately eighteen point three nine five five (18.3955) barrels of produced waste being released into a lined containment. A vacuum truck was dispatched to the site to recover free-standing fluids and approximately eighteen (18) barrels of produced water was recovered. The transfer pump was isolated to prevent fluid being further released and the mechanical seal was replaced. COG reported the release to the New Mexico Oil Conservation Division (NMOCD) and New Mexico State Land Office on a *Release Notification Form C-141* (Form C-141) on February 18, 2025. The release was assigned Incident Number nAPP2504930201.

SITE CHARACTERIZATION AND CLOSURE CRITERIA

The site is located within a low karst area. Based on a review of the New Mexico Office of State Engineers databases, two known water sources are within a 0.50-mile radius of the location. The closest well is located approximately 0.20 miles Southwest of the Site in Unit Letter M, S34, T22S, R34E and was drilled in May of 2020. The well has a reported depth to groundwater of 180 feet below ground surface. Per the NMOCD regulatory criteria established in 19.15.29.12 NMAC, the following criteria were utilized in assessing the site.

- Benzene: 10 milligrams per kilogram (mg/kg).
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX): 50 mg/kg.
- TPH: 2500mg/kg (GRO + DRO + MRO).
- Chloride: 20,00 mg/kg.

LINER INTEGRITY INSPECTION ACTIVITIES

A 48-hour advance notice of the liner inspection was submitted to the NMOCD and NMSLO on February 18, 2025. 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 Jacob Laird on February 21, 2025. Upon inspection, no rips, tears, holes, or damage was observed. The liner was determined to be sufficient, and all released fluids have been removed. Refer to photolog for details.

CLOSURE REQUEST

Based on the liner inspection throughout the facility, the liner was determined to be sufficient. The release was contained laterally by the lined containment and the liner was performing as designed. No further actions are required at the site. COG Operating, LLC respectfully requests that the New Mexico Oil Conservation Division and the New Mexico State Land Office grant closure approval for Incident Number nAPP2504930201.

Should you have any questions or concerns please do not hesitate to contact me.

Sincerely,

Jacob Laird

Jacob Laird
Environmental Engineer
jacob.laird@conocophillips.com
Appendices:

Figures- Site Map Overview, Topography Map, Secondary Containment Map

Appendix A: NMOCD Correspondence

Appendix B: Photolog

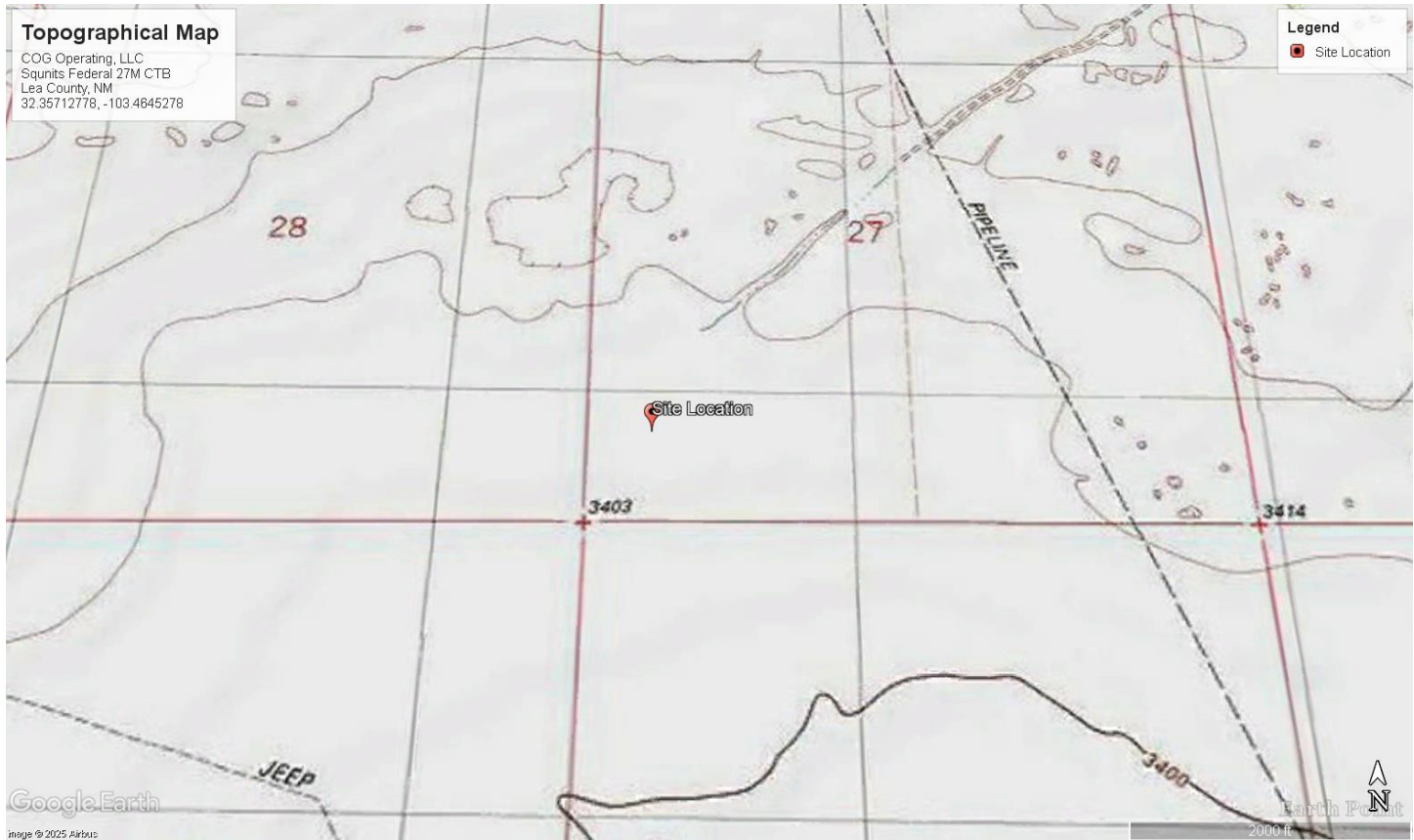
Appendix C: Site Characterization and Ground Water

Figures: Site Maps



Overview Map

COG Operating, LLC
Squints Federal 27M CTB
Lea County, New Mexico
32.35712778, -103.4645278



Topographical Map

COG Operating, LLC
Squints Federal 27M CTB
Lea County, New Mexico
32.35712778, -103.4645278



Secondary Containment Map

COG Operating, LLC
Squints Federal 27M CTB
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Appendix A: NMOCD Correspondence

Spill Calculation - On-Pad Surface Pool Snill

Received by OCD: 2/26/2025 10:06:07AM

Page 9 of 33

Convert Irregular shape into a series of rectangles	Length (ft.)	Width (ft.)	Average Depth (in.)	Estimated <u>Pool</u> Area (sq. ft.)	Estimated volume of each pool area (bbl.)	Penetration allowance (ft.)	Total Estimated Volume of Spill (bbl.)
Rectangle A	42	14	1.0	588.00	8.72	0.00	8.76
Rectangle B	20	7	1.0	140.00	2.08	0.00	2.09
Rectangle C	24	18	1.0	432.00	6.41	0.00	6.43
Rectangle D	20	7	1.0	140.00	2.08	0.00	2.09
Rectangle E				0.00	0.00	0.00	0.00
Rectangle F				0.00	0.00	0.00	0.00
Rectangle G				0.00	0.00	0.00	0.00
Rectangle H				0.00	0.00	0.00	0.00
Rectangle I				0.00	0.00	0.00	0.00
Rectangle J				0.00	0.00	0.00	0.00

Released to Imaging: 2/28/2025 2:30:27 PM

Total Volume Release, Soil not impacted:

18.3955

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS

Action 432943

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 432943
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2504930201
Incident Name	NAPP2504930201 SQUINTS FEDERAL 27M CTB @ 0
Incident Type	Produced Water Release
Incident Status	Initial C-141 Received
Incident Facility	[fAPP2129346777] Squints Fed 27 M CTB - RT BTTY

Location of Release Source

Please answer all the questions in this group.

Site Name	Squints Federal 27M CTB
Date Release Discovered	02/10/2025
Surface Owner	State

Incident Details

Please answer all the questions in this group.

Incident Type	Produced Water 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	Not answered.
Produced Water Released (bbls) Details	Cause: Equipment Failure Pump Produced Water Released: 18 BBL Recovered: 18 BBL Lost: 0 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.

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QUESTIONS, Page 2

Action 432943

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 432943
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

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	No
Reasons why this would be considered a submission for a notification of a major release	Unavailable.
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: 02/18/2025
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QUESTIONS, Page 3

Action 432943

QUESTIONS (continued)

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	Action Number: 432943
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Site Characterization	
<i>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.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Not answered.
What method was used to determine the depth to ground water	Not answered.
Did this release impact groundwater or surface water	Not answered.
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Not answered.
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Not answered.
An occupied permanent residence, school, hospital, institution, or church	Not answered.
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Not answered.
Any other fresh water well or spring	Not answered.
Incorporated municipal boundaries or a defined municipal fresh water well field	Not answered.
A wetland	Not answered.
A subsurface mine	Not answered.
An (non-karst) unstable area	Not answered.
Categorize the risk of this well / site being in a karst geology	Not answered.
A 100-year floodplain	Not answered.
Did the release impact areas not on an exploration, development, production, or storage site	Not answered.

Remediation Plan	
<i>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.</i>	
Requesting a remediation plan approval with this submission	No
<i>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.</i>	

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CONDITIONS

Action 432943

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 432943
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

CONDITIONS

Created By	Condition	Condition Date
rhamlet	None	2/18/2025

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Santa Fe, NM 87505

QUESTIONS

Action 433242

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 433242
	Action Type: [NOTIFY] Notification Of Liner Inspection (C-141L)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2504930201
Incident Name	NAPP2504930201 SQUINTS FEDERAL 27M CTB @ 0
Incident Type	Produced Water Release
Incident Status	Initial C-141 Approved
Incident Facility	[fAPP2129346777] Squints Fed 27 M CTB - RT BTTY

Location of Release Source	
Site Name	Squints Federal 27M CTB
Date Release Discovered	02/10/2025
Surface Owner	State

Liner Inspection Event Information	
<i>Please answer all the questions in this group.</i>	
What is the liner inspection surface area in square feet	7,730
Have all the impacted materials been removed from the liner	Yes
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	02/21/2025
Time liner inspection will commence	09:00 AM
Please provide any information necessary for observers to liner inspection	Jacob Laird 575-703-5482
Please provide any information necessary for navigation to liner inspection site	32.35712778, -103.4645278

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CONDITIONS

Action 433242

CONDITIONS


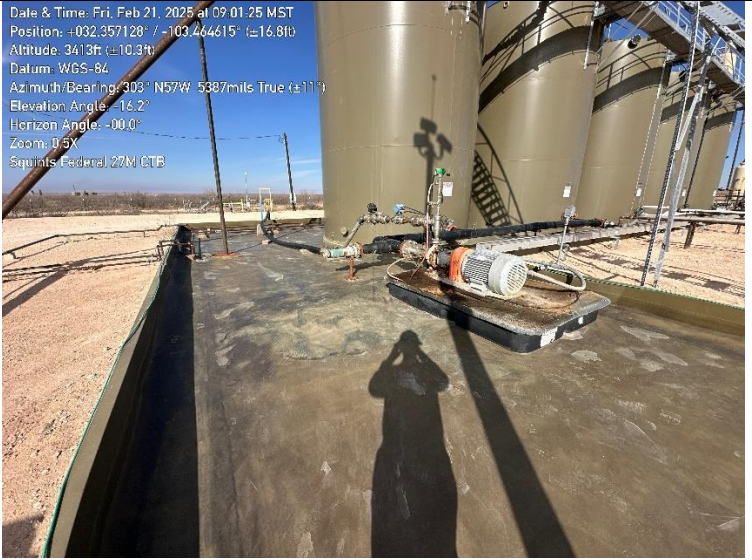

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 433242
	Action Type: [NOTIFY] Notification Of Liner Inspection (C-141L)

CONDITIONS

Created By	Condition	Condition Date
jlaire	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.	2/18/2025

Appendix B: Photolog

Photographic Log

<p>Facility: Squints Federal 27M CTB</p> <p>County: Lea County, New Mexico</p> <p>Description: Facility Sign</p>	<p>Date & Time: Fri, Feb 21, 2025 at 09:00:37 MST Position: +032.957307° / -103.464580° (±15.8ft) Altitude: 3410ft (±16.6ft) Datum: WGS-84 Azimuth/Bearing: 258° S78W 4587mils True (±11°) Elevation Angle: -07.3° Horizon Angle: +00.5° Zoom: 0.5X Squints Federal 27M CTB</p>  A photograph showing a facility sign in the foreground. The sign is black with white text and is mounted on a metal frame. It reads: "COG OPERATING LLC", "SQUINTS FEDERAL COM 27M CTB", "UL N SEC.27-T22S-R34E", "LEA COUNTY", "SQUINTS FEDERAL COM #7H LEASE #30-025-4367-", and "SQUINTS FEDERAL COM #8H LEASE #30-025-4368-". In the background, several large, cylindrical production tanks are visible under a clear blue sky.
<p>Facility: Squints Federal 27M CTB</p> <p>County: Lea County, New Mexico</p> <p>Description: View facing North/Northwest. Source of the release was the water transfer pump.</p>	<p>Date & Time: Fri, Feb 21, 2025 at 09:01:25 MST Position: +032.957128° / -103.464615° (±16.8ft) Altitude: 3413ft (±10.3ft) Datum: WGS-84 Azimuth/Bearing: 303° N57W 5387mils True (±11°) Elevation Angle: -16.2° Horizon Angle: -00.0° Zoom: 0.5X Squints Federal 27M CTB</p>  A photograph showing a view of a water transfer pump. The pump is a large, industrial machine with a motor and various pipes and valves. It is situated on a concrete pad. In the background, several large, cylindrical production tanks are visible under a clear blue sky.
<p>Facility: Squints Federal 27M CTB</p> <p>County: Lea County, New Mexico</p> <p>Description: View facing North. Lined area in front of the production tanks.</p>	<p>Date & Time: Fri, Feb 21, 2025 at 09:01:37 MST Position: +032.957155° / -103.464661° (±14.9ft) Altitude: 3409ft (±10.0ft) Datum: WGS-84 Azimuth/Bearing: 010° N10E 0178mils True (±11°) Elevation Angle: -16.2° Horizon Angle: -00.2° Zoom: 0.5X Squints Federal 27M CTB</p>  A photograph showing a view of a lined area in front of the production tanks. The lined area is a concrete pad with a metal railing. In the background, several large, cylindrical production tanks are visible under a clear blue sky.

Facility: Squints Federal 27M CTB

County: Lea County, New Mexico

Description: View facing North. Lined area behind the production tanks.



Facility: Squints Federal 27M CTB

County: Lea County, New Mexico

Description: View facing North. Lined area in front of the production tanks.



Facility: Squints Federal 27M CTB

County: Lea County, New Mexico

Description: View facing North. Lined area behind the production tanks.



Facility: Squints Federal 27M CTB

County: Lea County, New Mexico

Description: View facing North/Northeast. Lined area between the production tanks and the vapor recovery tower.



Facility: Squints Federal 27M CTB

County: Lea County, New Mexico

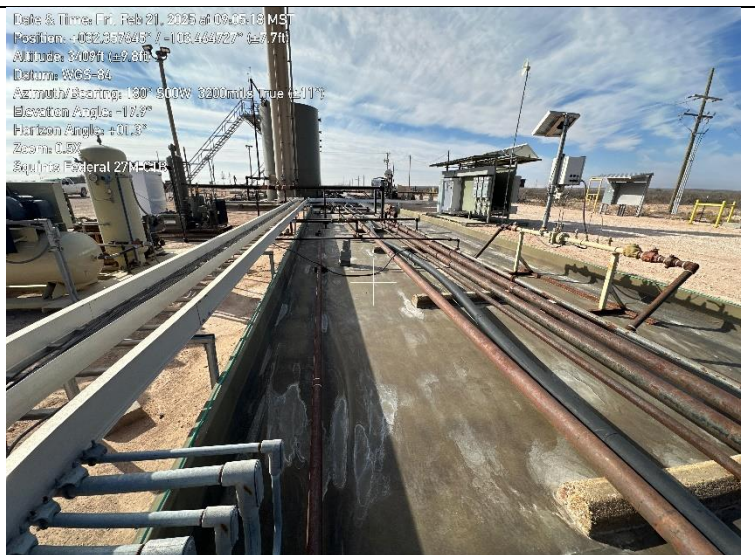
Description: View facing North. Lined area with production piping.



Facility: Squints Federal 27M CTB

County: Lea County, New Mexico

Description: View facing South. Lined area with production piping.



Facility: Squints Federal 27M CTB

County: Lea County, New Mexico

Description: View facing East. Lined area with production piping and production equipment.



Facility: Squints Federal 27M CTB

County: Lea County, New Mexico

Description: View facing East. Lined area with production piping and production equipment.



Facility: Squints Federal 27M CTB

County: Lea County, New Mexico

Description: View facing East. Lined area with production piping and production equipment.



Facility: Squints Federal 27M CTB

County: Lea County, New Mexico

Description: View facing South/Southwest. Lined area with production equipment.



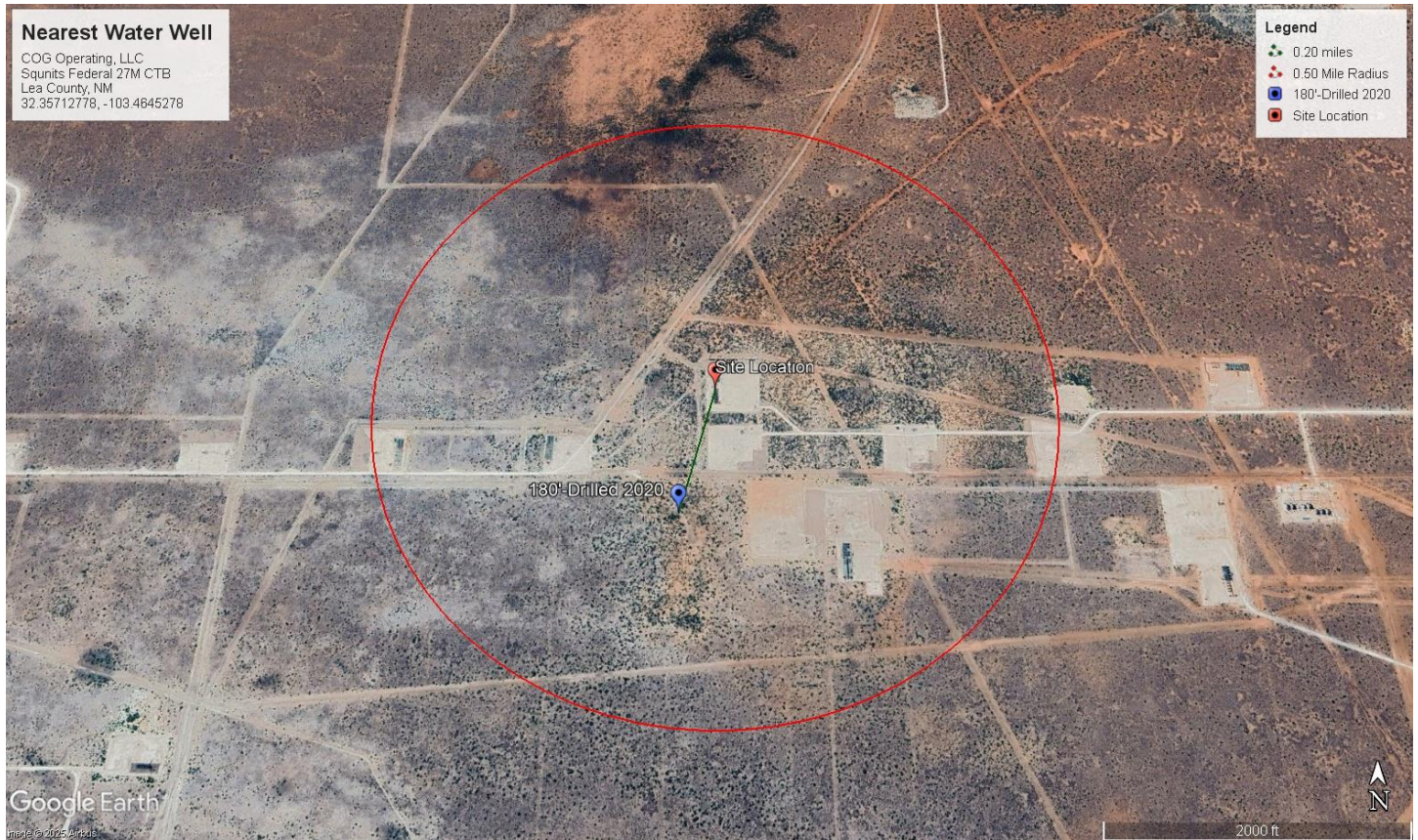
Facility: Squints Federal 27M CTB

County: Lea County, New Mexico

Description: View facing North/Northwest. Lined area with production equipment.



Appendix C: Site Characterization and Ground Water



Neatest Water Well Map

COG Operating, LLC
Squints Federal 27M CTB
Lea County, New Mexico
32.35712778, -103.4645278

quarters are 1=NW 2=NE 3=SW 4=SE quarters are smallest to largest				NAD83 UTM in meters						
Well Tag	POD Nbr	Q64	Q16	Q4	Sec	Tws	Rng	X	Y	Map
NA	CP 01826 POD1	NW	NW	NW	34	22S	34E	644379.1	3580778.4	

* UTM location was derived from PLSS - see Help

Driller License:	1706	Driller Company:	SUPERIOR DRILLING, LLC		
Driller Name:	BRYCE WALLACE				
Drill Start Date:	2019-12-12	Drill Finish Date:	2020-05-20	Plug Date:	
Log File Date:	2020-06-22	PCW Rcv Date:		Source:	Artesian
Pump Type:		Pipe Discharge Size:		Estimated Yield:	121
Casing Size:	6.00	Depth Well:	698	Depth Water:	180

Water Bearing Stratifications:

Top	Bottom	Description
85	210	Sandstone/Gravel/Conglomerate
520	580	Sandstone/Gravel/Conglomerate
670	690	Sandstone/Gravel/Conglomerate

Casing Perforations:

Top	Bottom
498	698

Meter Information

Meter Number:	20195	Meter Make:	TURBINES INC
Meter Serial Number:	2006233	Meter Multiplier:	1.0000
Number of Dials:	7	Meter Type:	Diversion
Unit of Measure:	Barrels 42 gal.	Reading Frequency:	Monthly

Meter Readings (in Acre-Feet)

Read Date	Year	Mtr Reading	Flag	Rdr	Comment	Mtr Amount	Online
2021-08-02	2021	647858.000	A	ad		0.000	
2021-09-01	2021	780461.000	A	ad		17.092	
2021-10-05	2021	918913.000	A	ad		17.846	
2021-11-04	2021	1048128.000	A	ad		16.655	
2021-12-13	2021	1202602.000	A	ad		19.911	
2022-01-01	2022	1271202.000	A	ad		8.842	
2022-02-08	2022	1402912.000	A	ad		16.977	
2022-03-02	2022	1402912.000	A	ad		0.000	
2022-04-01	2022	1402912.000	A	ad		0.000	
2022-05-06	2022	1788686.000	A	ad		49.724	
2022-06-07	2022	1858591.000	A	ad		9.010	
2022-07-10	2022	2010645.000	A	ad		19.599	
2022-09-05	2022	2215792.000	A	ad		26.442	
2022-10-10	2022	2215792.000	A	ad		0.000	
2022-11-10	2022	2215792.000	A	ad		0.000	
2023-06-07	2023	3016204.000	A	ad		103.168	
2023-07-03	2023	3217974.000	A	ad		26.007	
2023-08-09	2023	3358577.000	A	ad		18.123	
2023-10-09	2023	3516724.000	A	ad		20.384	

YTD Meter Amounts:

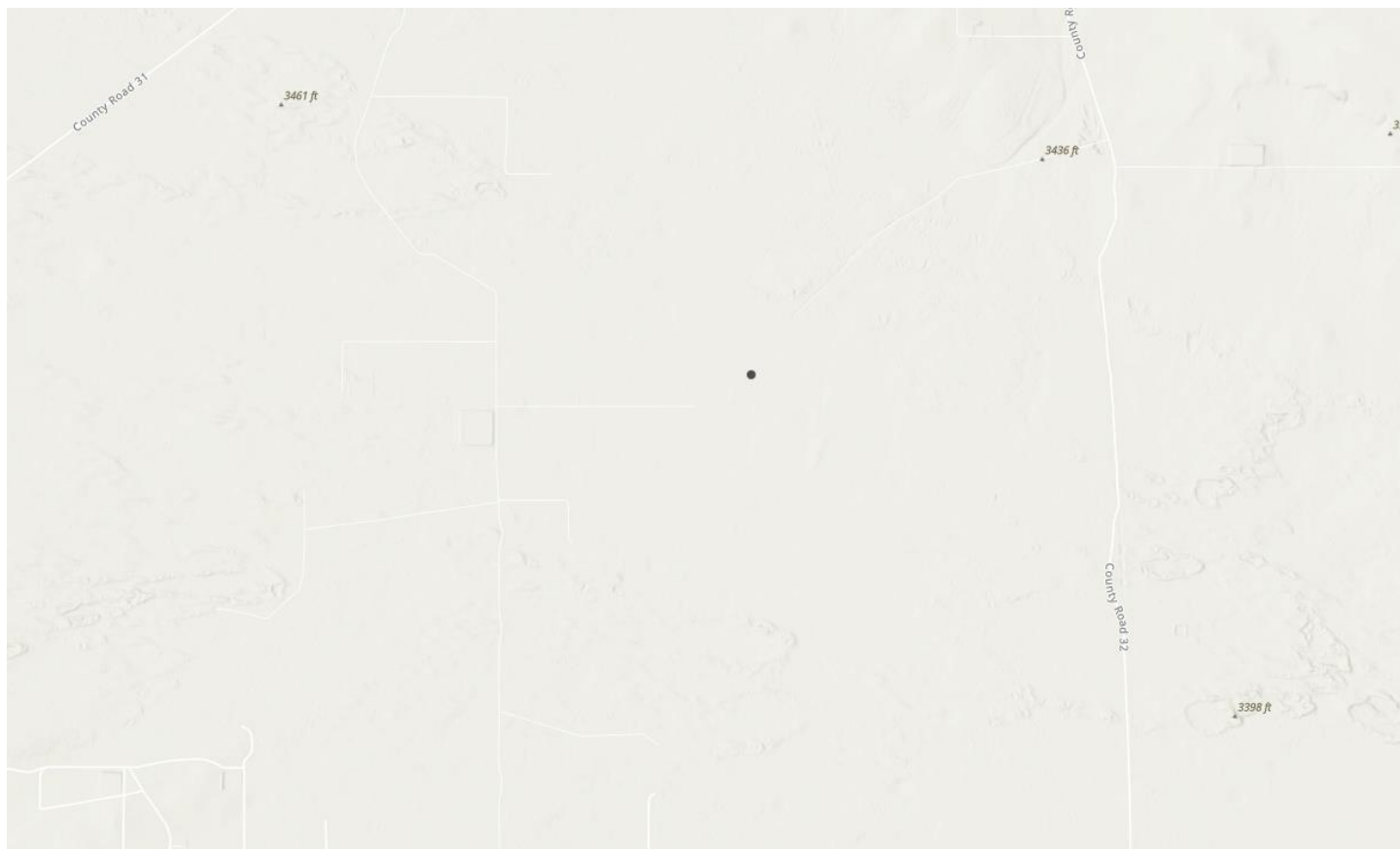
Year	Amount
2021	71.504
2022	130.594
2023	167.682

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.



Karst Map

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Hydrology Map

COG Operating, LLC
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QUESTIONS

Action 435448

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 435448
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2504930201
Incident Name	NAPP2504930201 SQUINTS FEDERAL 27M CTB @ 0
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Incident Status	Remediation Closure Report Received
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Location of Release Source

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Site Name	Squints Federal 27M CTB
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Surface Owner	State

Incident Details

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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.

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Produced Water Released (bbls) Details	Cause: Equipment Failure Pump Produced Water Released: 18 BBL Recovered: 18 BBL Lost: 0 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.

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QUESTIONS, Page 2

Action 435448

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 435448
	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	No
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	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	<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: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 02/18/2025
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Action 435448

QUESTIONS (continued)

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QUESTIONS

Site Characterization	
<i>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.</i>	
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
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Greater than 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Greater than 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	Between 1 and 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	
<i>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.</i>	
Requesting a remediation plan approval with this submission	Yes
<i>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.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
<i>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>	
On what estimated date will the remediation commence	02/10/2025
On what date will (or did) the final sampling or liner inspection occur	02/21/2025
On what date will (or was) the remediation complete(d)	02/21/2025
What is the estimated surface area (in square feet) that will be remediated	7730
What is the estimated volume (in cubic yards) that will be remediated	0
<i>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.</i>	
<i>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.</i>	

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Action 435448

QUESTIONS (continued)

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QUESTIONS

Remediation Plan (continued)	
<i>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.</i>	
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
<i>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>	
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: 02/26/2025
<i>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.</i>	

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Action 435448

QUESTIONS (continued)

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	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	433242
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	02/21/2025
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	7730

Remediation Closure Request	
<i>Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.</i>	
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	0
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	Liner integrity inspection activities were conducted following a release of produced water within a lined containment at the Site. 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.
<i>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>	
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: 02/26/2025

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CONDITIONS

Action 435448

CONDITIONS

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	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 #NAPP2504930201 SQUINTS FEDERAL 27M CTB, thank you. This Remediation Closure Report is approved.	2/28/2025