

August 22, 2025

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

Re: **Remediation Closure Request**

ConocoPhillips

Columbus Fee 23H Flowline Release Unit Letter B, Section 34, Township 25 South, Range 33 East

Lea County, New Mexico Incident ID# nAPP2500736394

Sir or Madam:

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips Company (ConocoPhillips) to assess a release at the Columbus Fee #23H Central Tank Battery (CTB) (facility fAB1909251433). The release footprint is located in Public Land Survey System (PLSS) Unit Letter B, Section 34, Township 25 South, and Range 33 East, in Lea County, New Mexico (Site). The approximate release point occurred at coordinates 32.0923754, -103.5566964, as shown on Figures 1 and 2.

BACKGROUND

According to the C-141 Initial Report, the release was discovered on December 30, 2024, and was caused by a hole in the flowline due to corrosion. Approximately 1 barrel (bbl) of crude oil and 13 bbls of produced water were reported released, of which 1 bbl of crude oil and 1 bbl of produced water were recovered. The release occurred behind the tank battery near production lines, in an on-pad area. The NMOCD approved the initial C-141 on January 7, 2025, and subsequently assigned the release the Incident ID NAPP2500736394. The initial C-141 form is included in Appendix A.

LAND OWNERSHIP

According to the NMOCD Oil and Gas Map, the Site is located on private land.

SITE CHARACTERIZATION

A site characterization was performed and no sinkholes, residences, schools, hospitals, institutions, churches, stream bodies, springs, playa lakes, wetlands, incorporated municipal boundaries, subsurface mines, or floodplains are located within the distances specified in 19.15.29.11 New Mexico Administrative Code (NMAC). The Site is in an area of low karst potential.

According to the New Mexico Office of the State Engineer (NMOSE) reporting system, there is one well located approximately 0.57 miles (925.1 meters) northeast of the Site with a reported depth to water of 110 feet below ground surface (bgs). Additionally, there is a windmill located approximately 0.5 miles northeast of the Site. The water well associated with this windmill location was used for groundwater depth determination for two previous release incidents (nRM2020456890 and nAPP240955421). A 2021 Closure Report was submitted for incident nRM2020456890 and was approved by the NMOCD on March 23, 2021.

Tetra Tech

A 2024 Remediation Summary and Soil Deferral Request Report was submitted for incident nAPP240955421 and was approved on February 5, 2025. These reports state that during the site characterization for the NRM2020456890 incident, the windmill was inspected, found inactive, and gauged. A static water level measurement of 135 feet bgs was collected from the well. Additionally, an electrical resistivity (ER) survey was conducted at the NRM2020456890 incident site in December of 2020 to confirm the groundwater depth determination. The ER survey data indicated a presence of groundwater at 131 feet bgs. The site characterization data is included in Appendix B.

On June 23, 2025, Tetra Tech personnel located the windmill and verified that the associated well is within 800-meters of the Site. Photographic documentation of the windmill and associated groundwater well is included in Appendix C. The location of the windmill in relation to the Site is presented in Figure 5.

REGULATORY FRAMEWORK

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

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

Constituent	Site RRALs
Chloride	20,000 mg/kg
TPH (GRO+DRO+ORO)	2,500 mg/kg
TPH (GRO+DRO)	1,000 mg/kg
BTEX	50 mg/kg
Benzene	10 mg/kg

SITE ASSESSMENT

On January 15, 2025, Tetra Tech was onsite to conduct assessment activities on behalf of ConocoPhillips. Assessment activities included installing four (4) hand auger borings (AH-1 through AH-4) in the release area footprint to total depths ranging from 3 to 3.5 feet bgs. Auger refusal was met at depths roughly between 3 and 3.5 feet bgs. Four (4) hand auger borings (AH-5 through AH-8) were installed along the perimeter of the release extent to 1 foot bgs.

Due to the dense subsurface lithology (caprock) beneath the footprint, vertical delineation was not achieved with the hand auger borings. Tetra Tech remobilized to the Site on February 13, 2025, and installed two (2) trenches (T-1 and T-2) using a mini excavator to evaluate the vertical extents of the release footprint. Trench T-1 was installed to 4.5 feet bgs and T-2 was installed to 5 feet bgs. Assessment sampling locations are presented in Figure 3.

A total of twenty-four (24) soil samples were sent to Cardinal Laboratories in Hobbs, New Mexico to be analyzed for chloride via Standard Method 4500Cl-B, TPH via EPA Method 8015M, and BTEX via EPA Method 8021B.

The laboratory analytical results from the January 2025 and February 2025 assessment sampling activities are summarized in Table 1. Analytical results associated with various soil depth intervals at AH-2, AH-3, T-1, and T-2 exceeded the Site RRAL for Total TPH (2,500 mg/kg). Additionally, analytical results associated with the surface soil interval (0'-1') at AH-1 and T-1 and the terminal soil interval (3'-3.5' bgs) at AH-4 exceeded the Site RRAL for TPH GRO+DRO (1,000 mg/kg). Analytical results associated with all soil depth intervals at AH-2 and T-2 and the upper soil depth interval (0'-1') at AH-3 exceeded the Site RRAL for BTEX (50 mg/kg).

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The release area footprint is located in an on-pad area within an active production facility with production lines present in both the subsurface and at the surface. Horizontal delineation of the release was achieved as a result of the January 2025 assessment activities. As mentioned, trenching was required to assess the release at depths greater than 3-3.5 feet bgs due to dense subsurface lithology. During the remobilization on February 2025, vertical delineation of the release was not fully achieved at sample location T-2. Laboratory analytical results associated with the basal depth interval (4'-5') exceeded the delineation criteria of 600 mg/kg for chloride. Trenching deeper than the 5-foot bgs interval at T-2 was not feasible due to safety concerns associated with the pressurized lines and equipment accessibility. Given the dense subsurface lithology, additional excavation was not possible without larger, heavier equipment, which was restricted by Site conditions.

REMEDIATION WORK PLAN AND NMOCD APPROVAL

Tetra Tech, on behalf of ConocoPhillips, prepared a Release Characterization and Remediation Work Plan dated March 28, 2025 that described the assessment activities and proposed remedial actions to address the release incident.

The Release Characterization and Remediation Work Plan was conditionally approved by the NMOCD on April 7, 2025 with the following comments:

- "The Remediation Plan is Conditionally Approved. When nearby wells are used to determine depth to groundwater, the wells should be no further than ½ mile away from the site, and data should be no more than 25 years old, and well construction information should be provided. If evidence of depth to ground water within a ½ mile radius of the site cannot be provided, impacted soils will need to meet Table 1 Closure Criteria for ground water at a depth of 50 feet or less. If you feel the depth to groundwater is >100', a shallow borehole can be drilled to 101' allowing for verification of the depth. If water is not visible after reaching bottom-hole and waiting 72 hours, the OCD will accept this as evidence. We would just need a copy of the driller's log.
- Floor confirmation samples should be delineated/excavated to meet closure criteria standards from Table 1 of the OCD Spill Rule for site assessment/characterization/depth to water determination. Sidewall/Edge samples should be delineated/excavated to 600 mg/kg for chlorides and 100 mg/kg for TPH to define the edge of the release. Please make sure that the edge of the release extent is accurately defined, especially around equipment. All off pad areas must meet reclamation standards in the OCD Spill Rule. The work will need to be completed in 90 days after the report has been reviewed."

A copy of the regulatory determination is included in Appendix D.

REMEDIATION ACTIVITIES

ConocoPhillips operations personnel mobilized to the Site to conduct remedial activities from June 18 through June 21, 2025. Prior to confirmation sampling, the NMOCD district office was notified on June 16, 2025 via the OCD Portal (C-141N) in accordance with Subsection D of 19.15.29.12 NMAC. A variance to continue confirmation sampling outside of the initial notice period was requested for June 20, 2025, and was denied by the NMOCD. Copies of the regulatory correspondence are included in Appendix D.

ConocoPhillips operations excavated impacted soils as presented in Figure 4. The release was excavated to the maximum extent practicable due to the numerous surface lines and subsurface lines present within the excavation area in an active facility. The western portion of the release extent, in the vicinity of assessment sampling locations AH-1 and T-1, was excavated to 1.5 feet bgs. The eastern portion of the release extent, in the vicinity of assessment sampling location AH-4, was excavated to 4 feet bgs. The central portion of the release extent, in the vicinity of assessment sampling location T-2, was excavated to a final depth of 9 feet bgs. Photographs from the excavated areas prior to backfill are provided in Appendix C.

Following excavation, confirmation floor and sidewall samples were collected and submitted for laboratory analysis to verify efficacy of remediation activities. Confirmation samples were collected such that each discrete sample (sidewall and floor) was representative of no more than 200 square feet of excavated area.

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Confirmation sidewall sample locations were labeled with "SW"-#, and confirmation floor sample locations were labeled with "FS"- #.

A total of three (3) floor sample locations and four (4) sidewall sample locations were collected for laboratory analysis during the remedial activities. Collected confirmation samples were placed into laboratory-provided sample containers, transferred under chain-of-custody, and analyzed within appropriate holding times by Cardinal. The soil samples were analyzed for TPH (GRO+DRO+MRO) by EPA Method 8015M, BTEX by EPA Method 8021B, and chloride by SM4500Cl-B. Laboratory analytical data is included in Appendix E.

The initial analytical results associated with floor confirmation sample FS-2, which was collected at a depth of 8 feet bgs in the area of T-2, for chloride (848 mg/kg) was below the Site RRAL of 20,000 mg/kg. However, these results exceeded the delineation criteria of 600 mg/kg for chloride. To achieve vertical delineation, the excavation was deepened to 9 feet bgs and an iterative confirmation sample was collected from the floor of the excavation. The laboratory analytical result for FS-2 (9') indicated a chloride concentration of 48 mg/kg. The C-141N variance request for June 20, 2025 which was denied by the NMOCD was to complete vertical delineation of chloride to 600 mg/kg at this location. Excavation of soils to the Site-specific closure criteria standards was completed within the original sampling dates.

The results of the June 2025 confirmation sampling events are summarized in Table 2. The analytical results were directly compared to the established Site RRALs to demonstrate compliance. All final confirmation soil samples (floor and sidewall) were below the applicable cleanup levels for all analyzed constituents. Final excavated areas, depths, and representative confirmation sample locations are indicated in Figure 4.

All of the excavated material was transported offsite for proper disposal. Approximately one-hundred and fifty-two (152) cubic yards of material were transported to the R360 Halfway in Hobbs, New Mexico.

SITE RECLAMATION

Once acceptable confirmation sample results were received, the excavation was backfilled with clean material that is non-waste containing, uncontaminated, earthen material and the liner replaced. The area was restored to the original condition. This release footprint was within an active pad, so these areas were not seeded.

CONCLUSION

In accordance with the conditional approval of the Remediation Work Plan, the depth to groundwater beneath the Site was verified and is not present at 100 feet bgs or less. Full delineation of the release was achieved through sidewall and floor confirmation sampling to the appropriate closure criteria as determined by the site characterization.

ConocoPhillips respectfully requests closure of the release incident based on the confirmation sampling results and remediation activities performed. If you have any questions concerning the remediation activities for the Site, please call me at (512) 596-8201.

Sincerely,

Tetra Tech, Inc.

Lisbeth Chavira Project Manager Samanatha K. Abbott, P.G. Senior Project Manager

CC:

Mr. Jacob Laird, GPBU - ConocoPhillips

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LIST OF ATTACHMENTS

Figures:

Figure 1 – Overview Map

Figure 2 – Topographic Map

Figure 3 – Approximate Release Extent and Site Assessment

Figure 4 – Remediation Extent and Confirmation Sampling

Tables:

Table 1 – Summary of Analytical Results – 2025 Soil Assessment Table 2 – Summary of Analytical Results – 2025 Soil Remediation

Appendices:

Appendix A – C-141 Forms

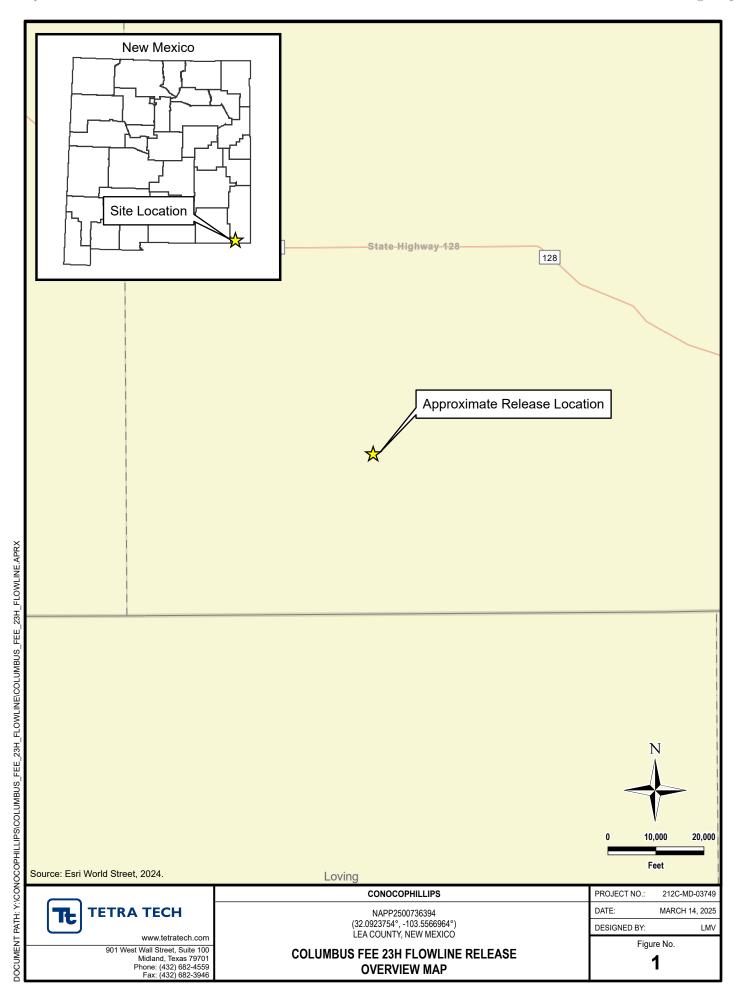
Appendix B - Site Characterization Data

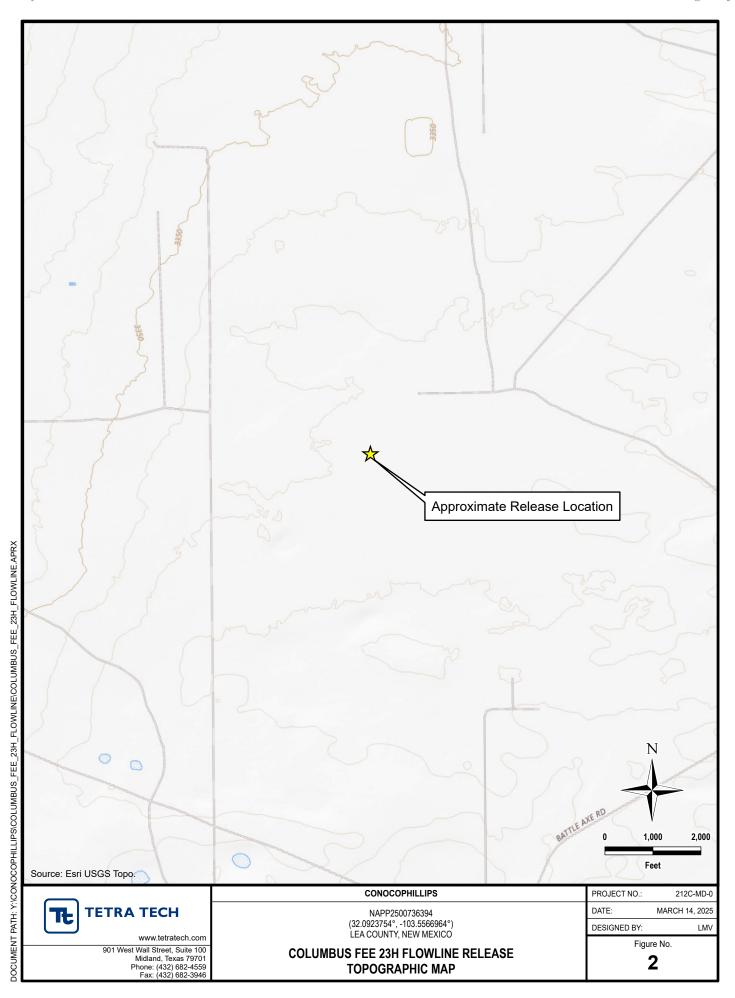
Appendix C – Photographic Documentation

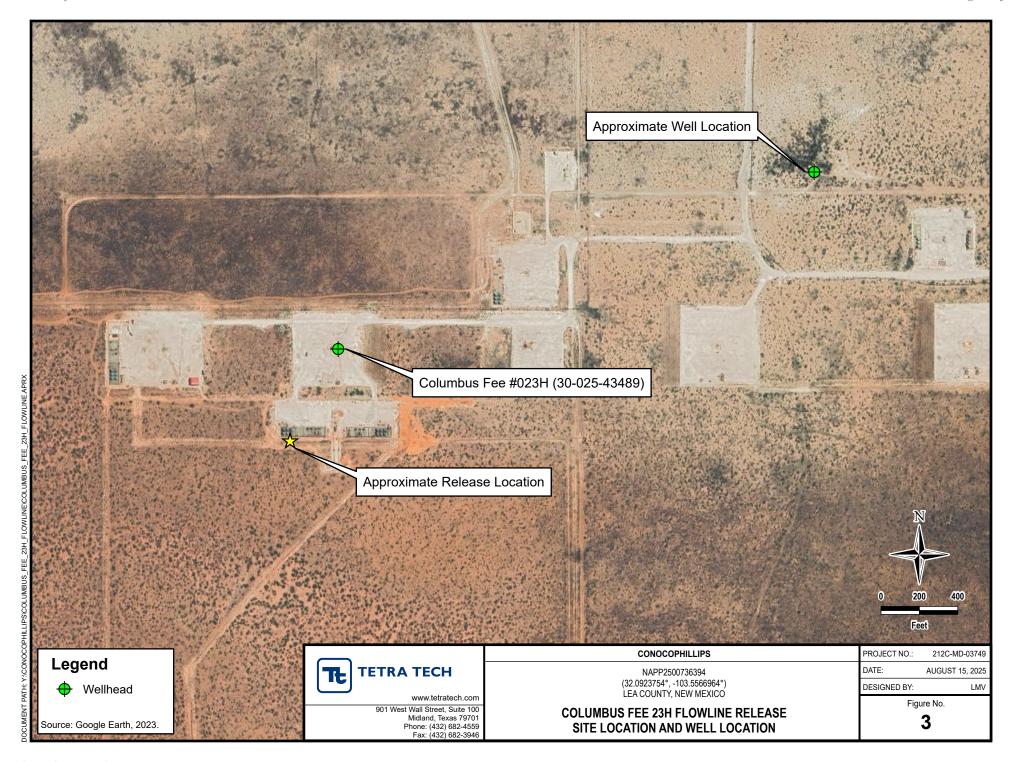
Appendix D – Regulatory Correspondence

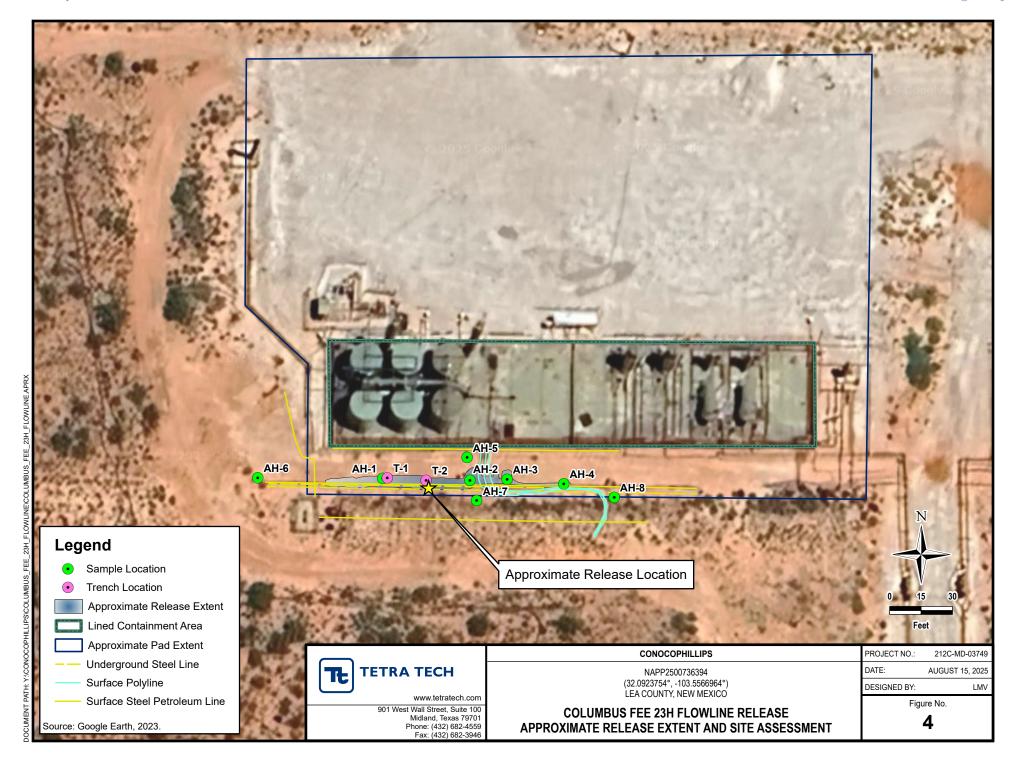
Appendix E - Laboratory Analytical Data

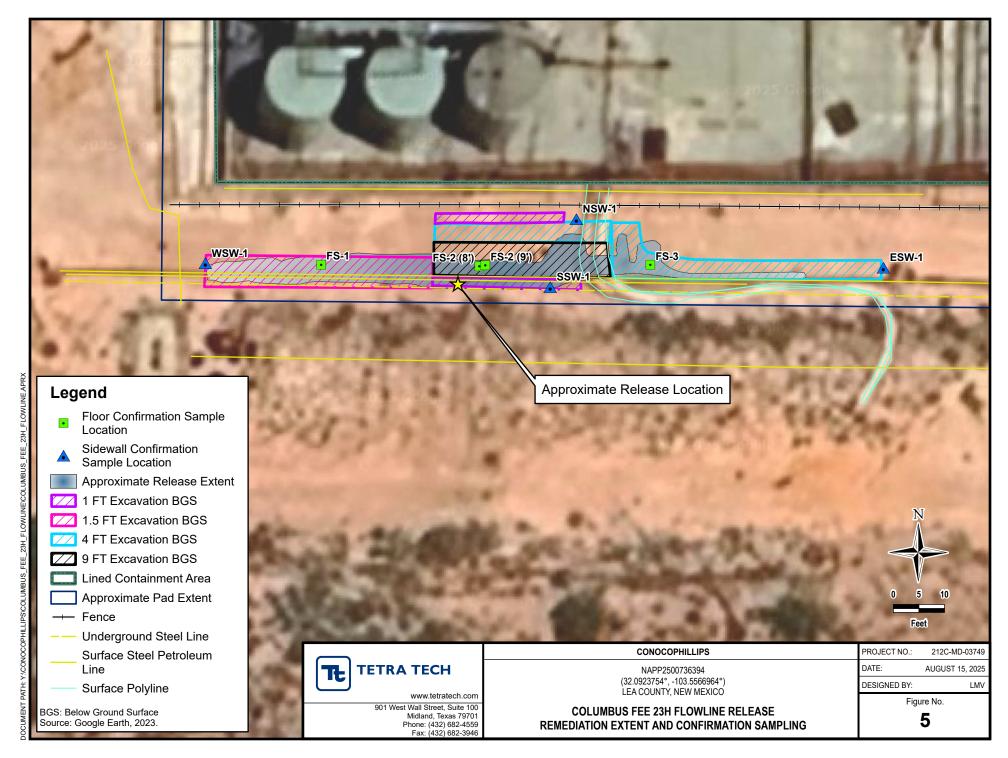
FIGURES











TABLES

TABLE 1 SUMMARY OF ANALYTICAL RESULTS SOIL ASSESSMENT- nAPP2500736394 CONOCOPHILLIPS COLUMBUS FEE 23H FLOWLINE RELEASE LEA COUNTY, NM

19.15.29.12 NMAC Closure Criteria for Soils Impacted by a Release (>100 ft):		Chlorid	es ¹	BTEX ²									TPH ³										
		< 20,000 mg/kg		< 10 mg	mg/kg							< 50 mg/kg		GRO		DRO		EXT DE	20	< 2,500 mg/kg	1,000 mg/kg		
Sample ID Samp	Sample Date	Sample Depth Interval	Chloric	de	Benze	ne	Tolue	ne	Ethylber	nzene	Total Xyl	enes	Total B	TEX	C ₆ - C		> C ₁₀ -		> C ₂₈ -		Total TPH (GRO+DRO+EXT DRO)	GRO+DRO	
		ft. bgs	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	mg/kg	
		0-1	7,920		0.312	S-04	4.15	S-04	5.70	C-NC1, S-	18.6	S-04	28.8	C-NC1, S-	431		1,480		149		2,060	1,911	
AH-1	1/15/2025	2-3	8,000		<0.050		0.063		0.312	GC-NC1	0.283		0.658	GC-NC1	<10.0		114		<10.0		114	114	
		3-3.5	6,800		<0.050		0.208		0.434	GC-NC1	0.797		1.44	GC-NC1	<10.0		85.6		<10.0		85.6	85.6	
		0-1	5,700		7.15		63.3		53.5	GC-NC1	235		359	GC-NC1	8,520		21,800		2,820		33,140	30,320	
AH-2	1/15/2025	2-3	6,800		4.39		51.4		42.4	GC-NC1	183		281	GC-NC1	5,880		13,200		1,750		20,830	19,080	
		3-3.5	6,600		3.99	QM-07	43	QM-07	15.2	NC1, QM	140	QM-07	202	GC-NC1	4,210		9,550		926		14,686	13,760	
		0-1	4,500		1.28		32.5		15	GC-NC1	147		196	GC-NC1	4,430		11,900		1,540		17,870	16,330	
AH-3	1/15/2025	2-3	5,800		<0.050		1.79		1.13	GC-NC1	11.4		14.4	GC-NC1	489		1,770		216		2,475	2,259	
		3-3.5	5,600		<0.050		1.38		0.983	GC-NC1	10.3		12.6	GC-NC1	512	QM-07	1,680	QM-07	246		2,438	2,192	
AH-4 1/15/2025		0-1	160		<0.050		<0.050		<0.050		0.291		<0.300		12.2		109		10.8		132	121.2	
	1/15/2025	2-3	352		<0.050		<0.050		<0.050		0.461		0.461		11		78.5		<10.0		89.5	89.5	
		3-3.5	208		<0.050		0.444		0.461	GC-NC1	5.71		6.62	GC-NC1	231		920		131		1,282	1,151	
AH-5	1/15/2025	0-1	64		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	-	
AH-6	1/15/2025	0-1	16		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		=	-	
AH-7	1/15/2025	0-1	64		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	-	
AH-8	1/15/2025	0-1	48		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	-	
		0-1	6,000		0.219		3.68		1.73		17.6		23.2		791		2,880		399		4,070	3,671	
T-1	2/13/2025	2-3	8,000		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	-	
1-1	2/13/2025	3-4	2,120		<0.050		<0.050		<0.050		<0.150		<0.300		14.7		355		59.8		429.5	369.7	
		4-4.5	1,570		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-		
		0-1	560		13.9		152		43.5		405		615		12,200		21,900		3,320		37,420	34,100	
T-2	2/13/2025	2-3	2,350		8.74		70.7		16.7		158		254		6,750		10,000		1,450		18,200	16,750	
1-2	2/13/2023	3-4	5,200		30.4		193		44.3		395		663		18,100		26,400		3,690		48,190	44,500	
		4-5	4,660		8.54		86.7		23.7		220		339		9,830		18,400		2,660		30,890	28,230	

NOTES:

bgs Below ground surface

mg/kg Milligrams per kilogram

TPH Total Petroleum Hydrocarbons

GRO Gasoline range organics

DRO Diesel range organics

Method SM4500Cl-B

2 Method 8021B

3 Method 8015M

Bold and italicized values indicated exceedances of proposed RRALs and Reclamation Requirements.

Shaded rows indicate intervals that were excavated and removed during remedial activities..

QUALIFIERS:

S-04 The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.

QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS

GC-NC1 8260 confirmation analysis was performed; initial GC results were not supported by GC/MS analysis and are biased high with interfering compounds.

TABLE 2 SUMMARY OF ANALYTICAL RESULTS SOIL REMEDIATION - nAPP2500736394 CONOCOPHILLIPS COLUMBUS FEE 23H FLOWLINERELEASE LEA COUNTY, NM

							BTEX ²								TPH ³							
Sample ID	Sample Depth Chloride ¹		Benzei	Benzene Toluene		E+hylbon:	Ethylboneous 7		Total Xylenes		Total BTEX			DRO		EXT DRO		Total TPH				
Sample 1D	Sample Date				Delizei	ile	Toluel	ie	Ethylbeni	Ethylbenzene Total X		Total Aylenes		IOLAI BIEA		C ₆ - C ₁₀		> C ₁₀ - C ₂₈		C ₃₆	(GRO+DRO+EXT DRO)	
		in. bgs	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	
FS-1	6/19/2025	1.5	64.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
FS-2	6/19/2025	8	848		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		262		40		302	
FS-2 (9')	6/20/2025	9	48.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		89.5		26		115.5	
FS-3	6/19/2025	4	256		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		366		74.5		440.5	
NSW-1	6/19/2025	-	160		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		26.8		<10.0		26.8	
WSW-1	6/19/2025	-	80.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		28.9		<10.0		28.9	
SSW-1	6/19/2025	-	128		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		74.8		12		86.8	
ESW-1	6/19/2025	-	96.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		58.3		<10.0		58.3	

NOTES:

ft. Feet

bgs Below ground surface

mg/kg Milligrams per kilogram

TPH Total Petroleum Hydrocarbons

GRO Gasoline range organics

DRO Diesel range organics

1 Method SM4500Cl-B

2 Method 8021B3 Method 8015M

Bold and italicized values indicate exceedance of proposed Remediation RRALs and Reclamation Requirements.

Gold highlight represents soil horizons that were removed during deepening of excavation floors.

 $Green\ highlight\ represents\ soil\ intervals\ that\ were\ removed\ during\ horizontal\ expansion\ of\ excavation\ sidewalls.$

APPENDIX A C-141 Forms

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 417834

QUESTIONS

Operator:	OGRID:
COG OPERATING LLC	229137
600 W Illinois Ave	Action Number:
Midland, TX 79701	417834
	Action Type:
	[C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Prerequisites						
Incident ID (n#)	nAPP2500736394					
Incident Name	NAPP2500736394 COLUMBUS FEE 023H @ 0					
Incident Type	Release Other					
Incident Status	Initial C-141 Received					
Incident Facility	[fAB1909251433] COLUMBUS FEE #23H CTB					

Location of Release Source							
Please answer all the questions in this group.							
Site Name	Columbus Fee 023H						
Date Release Discovered	12/30/2024						
Surface Owner	Private						

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 f	or the volumes provided should be attached to the follow-up C-141 submission.
Crude Oil Released (bbls) Details	Cause: Corrosion Flow Line - Production Crude Oil Released: 1 BBL Recovered: 1 BBL Lost: 0 BBL.
Produced Water Released (bbls) Details	Cause: Corrosion Flow Line - Production Produced Water Released: 13 BBL Recovered: 1 BBL Lost: 12 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.

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

Phone: (505) 629-6116

Energy, Minerals and Natural Resources Oil Conservation Division Online Phone Directory https://www.emnrd.nm.gov/ocd/contact-us 1220 S. St Francis Dr.

QUESTIONS, Page 2

Action 417834

QUESTI	ONS (continued)					
Operator: COG OPERATING LLC	OGRID: 229137					
600 W Illinois Ave Midland, TX 79701	Action Number:					
Midald, 1X79701	417834 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.	e. gas only) are to be submitted on the C-129 form.					
L W L D						
Initial Response The responsible party must undertake the following actions immediately unless they could create a s	afety 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.					
	ation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative led or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of valuation in the follow-up C-141 submission.					
to report and/or file certain release notifications and perform corrective actions for releathe OCD does not relieve the operator of liability should their operations have failed to a	knowledge and understand that pursuant to OCD rules and regulations all operators are require ases which may endanger public health or the environment. The acceptance of a C-141 report by adequately investigate and remediate contamination that pose a threat to groundwater, surface to does not relieve the operator of responsibility for compliance with any other federal, state, or					
	Name: Brittany Esparza					
I hereby agree and sign off to the above statement	Title: Environmental Technician					

Email: brittany.Esparza@ConocoPhillips.com

Date: 01/07/2025

State of New Mexico

Santa Fe, NM 87505

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

General Information Phone: (505) 629-6116

Operator:

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

COG OPERATING LLC

600 W Illinois Ave

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 417834

QUESTIONS (continued)

OGRID:

229137

600 W Illinois Ave	Action Number:
Midland, TX 79701	417834
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)
QUESTIONS	
Site Characterization	
Please answer all the questions in this group (only required when seeking remediation plan approve release discovery date.	al and beyond). This information must be provided to the appropriate district office no later than 90 days after the
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 a	nd 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					
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	No				
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					

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

CONDITIONS

Action 417834

CONDITIONS

Operator:	OGRID:
COG OPERATING LLC	229137
600 W Illinois Ave	Action Number:
Midland, TX 79701	417834
	Action Type:
	[C-141] Initial C-141 (C-141-v-Initial)

CONDITIONS

Created By	y Condition	Condition Date
rhamlet	None	1/7/2025

FPad available, volume volume svailable, volume volume - Con-Pad Surface Poetration Total Estim vance (ft.)	Soil / Caliche	the Release to 3 (dropdowr (dropdowr No Ves	Was the Release to (dropdown (dropdown) Yes	Was the Relea (dro
-On-Pad Surface Pool Spill -On-Pad Surface Pool Spill stration	>	No Yes	DBE - Asset Avg.	Sset Area: DBE - Asset Avg. Yes Known Volume (dropdown):
Penetration Total Estimated Volume of allowance Spill (ft.) (bbl.) (bbl.) (c) 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.			8	2 2
Penetration Total Estimated Volume of allowance Spill (ft) (bl.) (bl.)				
Penetration Total Estimated Volume of allowance Spill (ft.) (bbl.) (ft.) (b0.00 1.43 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0		No	» «N	>
Penetration Total Estimated Volume of allowance Spill (ft.) (bbl.) 0.01 13.04 0.00 0.00 0.00 0.00 0.00 0.00	pill Calcul	S	S	S
13.04 1.43 0.00 0.00	volume ol area)	Area Estimated volume of each pool area (bb.)	Pool (Estimated <i>Pool</i> Area (sq. ft.)
1.43 0.00 0.00 0.00		348.00 12.91	348.00	2.5 348.00
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			00:00	00:00
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Page 21 of 80

Incident ID	nAPP2500736394	I
District RP		
Facility ID		
Application ID		

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	> 100 (ft bgs)
Did this release impact groundwater or surface water?	☐ Yes 🗹 No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes 🗸 No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes 🗸 No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes 🗸 No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes 🗸 No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes 🗹 No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes 🗸 No
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes 🗹 No
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes 🗹 No
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes 🗸 No
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes 🗹 No
Did the release impact areas not on an exploration, development, production, or storage site?	☐ Yes 🗹 No
Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and ver contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.	tical extents of soil
Characterization Report Checklist: Each of the following items must be included in the report.	
 ✓ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wel ✓ Field data ✓ Data table of soil contaminant concentration data ✓ Depth to water determination 	ls.

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release

Boring or excavation logs

Topographic/Aerial maps

Photographs including date and GIS information

Laboratory data including chain of custody

Received by OCD: 8/26/2025/10:20:577MM Form C-141 State of New Mexico Oil Conservation Division Page 4

Page 22 of	80
nAPP2500736394	
	1

Incident ID	nAPP2500736394
District RP	
Facility ID	
Application ID	

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. Title: Environmental Engineer, DBE Printed Name: Jacob Laird Signature: <u>Jacob Laird</u> Date: 3/31/2025 email: Jacob.Laird@conocophillips.com Telephone: 575-703-5482 **OCD Only** Received by: Date: _____

e of New Mexico

Incident ID	nAPP2500736394
District RP	
Facility ID	
Application ID	

Remediation Plan

Remediation Plan Checklist: Each of the following items must be	included in the plan.
Detailed description of proposed remediation technique Scaled sitemap with GPS coordinates showing delineation points Estimated volume of material to be remediated Closure criteria is to Table 1 specifications subject to 19.15.29.1 Proposed schedule for remediation (note if remediation plan times)	2(C)(4) NMAC
<u>Deferral Requests Only</u> : Each of the following items must be conjugated	firmed as part of any request for deferral of remediation.
Contamination must be in areas immediately under or around prodeconstruction.	oduction equipment where remediation could cause a major facility
Extents of contamination must be fully delineated.	
Contamination does not cause an imminent risk to human health.	the environment, or groundwater.
I hereby certify that the information given above is true and complete rules and regulations all operators are required to report and/or file complete which may endanger public health or the environment. The acceptar liability should their operations have failed to adequately investigate surface water, human health or the environment. In addition, OCD a responsibility for compliance with any other federal, state, or local lateral states are required to report and/or file compliance with any other federal, state, or local lateral states are required to report and/or file compliance with any other federal, state, or local lateral states are required to report and/or file compliance with any other federal, state, or local lateral states are required to report and/or file complete rules and regulations all operators are required to report and/or file complete rules and regulations all operators are required to report and/or file complete rules and required to report and/or file complete rules are required to report and/or file complete rules and required to report and/or file complete rules are required to rules	ertain release notifications and perform corrective actions for releases ace of a C-141 report by the OCD does not relieve the operator of and remediate contamination that pose a threat to groundwater, cceptance of a C-141 report does not relieve the operator of
Printed Name: Jacob Laird	Title: Environmental Engineer, DBE
Signature: <u>Jacob Laird</u>	Date: 3/31/2025
email: Jacob.Laird@conocophillips.com	Telephone: 575-703-5482
OCD Only	
Received by:	Date:
☐ Approved ☐ Approved with Attached Conditions of A	Approval
Signature:	Date:

Received by OCD: 8/26/2025 10:20:57 AM Form C-141 State of New Mexico Page 6 Oil Conservation Division

Incident ID
District RP
Facility ID
Application ID

Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

Closure Report Attachment Checklist: Each of the following items must be included in the closure report.

☐ A scaled site and sampling diagram as described in 19.15.29.1	1 NMAC
Photographs of the remediated site prior to backfill or photos must be notified 2 days prior to liner inspection)	of the liner integrity if applicable (Note: appropriate OCD District office
☐ Laboratory analyses of final sampling (Note: appropriate ODC	C District office must be notified 2 days prior to final sampling)
Description of remediation activities	
and regulations all operators are required to report and/or file certain may endanger public health or the environment. The acceptance of	ntions. The responsible party acknowledges they must substantially nditions that existed prior to the release or their final land use in
Printed Name:	Title:
Signature: <u>Jacob Laird</u>	Date:
email:	Telephone:
OCD Only	
Received by:	Date:
	of liability should their operations have failed to adequately investigate and water, human health, or the environment nor does not relieve the responsible or regulations.
Closure Approved by:	Date:
Printed Name:	Title:

APPENDIX B Site Characterization Data

OCD Land Ownership



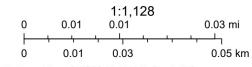
3/21/2025, 8:30:43 AM

Mineral Ownership

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

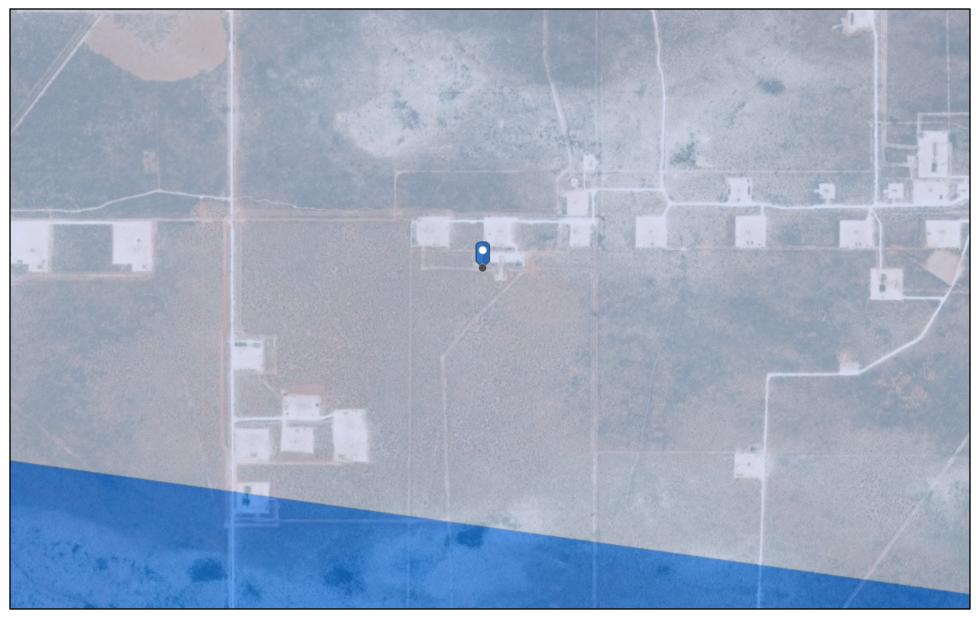
Land Ownership

Р



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

OCD Karst Potential

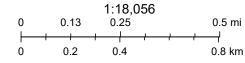


3/21/2025, 8:39:48 AM

Karst Occurrence Potential



Medium



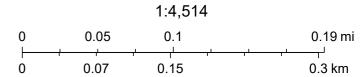
BLM, OCD, New Mexico Tech, Esri, HERE, Garmin, iPC, Maxar

OCD Well Location



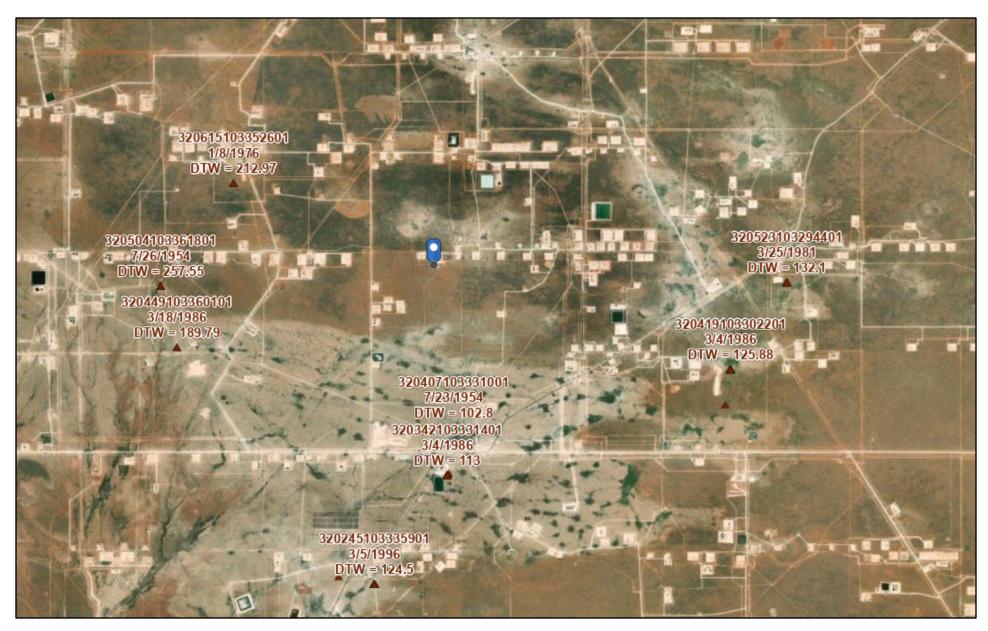
3/19/2025, 4:08:55 PM

OSE Water PODs



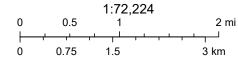
USGS, Esri, HERE, Garmin, iPC, Maxar

USGS Wells



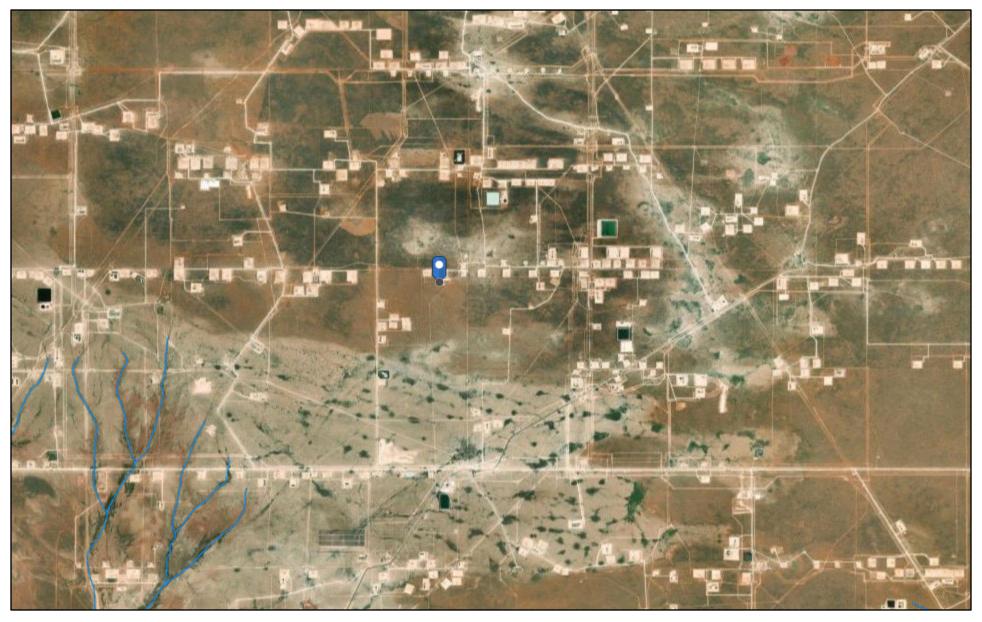
3/21/2025, 8:44:22 AM

USGS Historical GW Wells



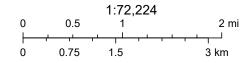
Esri, HERE, Garmin, Earthstar Geographics, USGS

OCD Water Bodys



3/21/2025, 8:37:27 AM

OSE Streams



Esri, HERE, Garmin, Earthstar Geographics, NM OSE



National Wetlands Inventory



March 21, 2025

Wetlands

Estuarine and Marine Deepwater

Estuarine and Marine Wetland

Freshwater Emergent Wetland

Freshwater Forested/Shrub Wetland

Freshwater Pond

Lake

Riverine

Other

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

Received by OCD: 8/26/2025 10:20:57 AM National Flood Hazard Layer FIRMette





SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT Without Base Flood Elevation (BFE) With BFE or Depth Zone AE, AO, AH, VE, AR SPECIAL FLOOD HAZARD AREAS Regulatory Floodway 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 OTHER AREAS OF Area with Flood Risk due to Levee Zone D FLOOD HAZARD NO SCREEN Area of Minimal Flood Hazard Zone X Effective LOMRs OTHER AREAS Area of Undetermined Flood Hazard Zone D - - - Channel, Culvert, or Storm Sewer **GENERAL** STRUCTURES | LILLILL Levee, Dike, or Floodwall 20.2 Cross Sections with 1% Annual Chance 17.5 Water Surface Elevation **Coastal Transect** www 513 www Base Flood Elevation Line (BFE) Limit of Study Jurisdiction Boundary -- -- Coastal Transect Baseline OTHER **Profile Baseline FEATURES** Hydrographic Feature Digital Data Available No Digital Data Available

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

Unmapped

an authoritative property location.

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

MAP PANELS

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 3/21/2025 at 1:48 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.

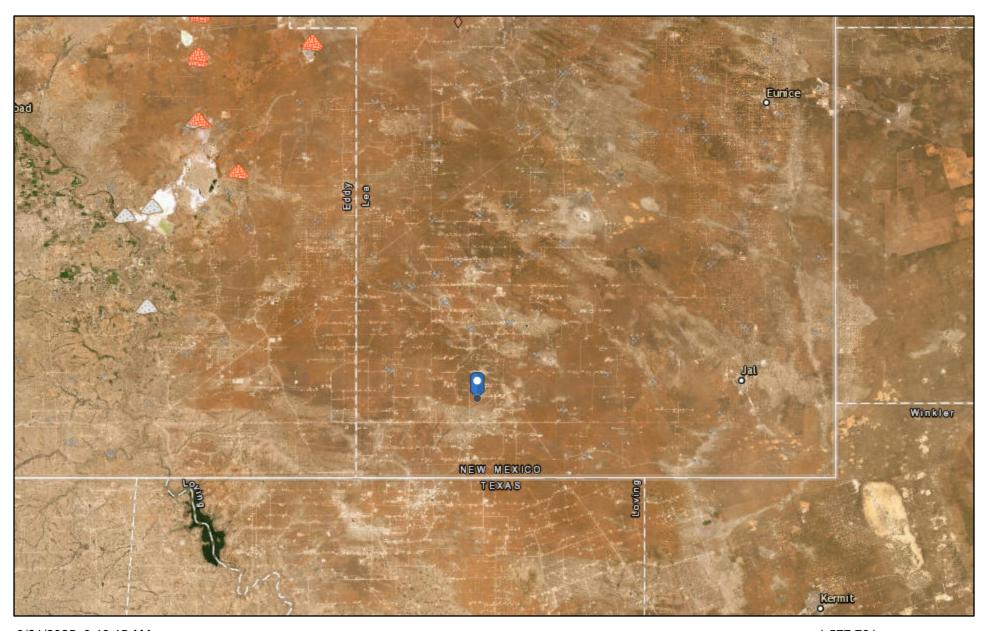
This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory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



OReleas 250 Im 5 9 99: 10/7/2025 P.991:10 PM

2,000

Active Mines in New Mexico



3/21/2025, 8:46:45 AM

Registered Mines

* Aggregate, Stone etc.

Aggregate, Stone etc.

Aggregate, Stone etc.

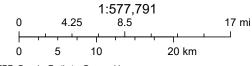
Potash

Aggregate, Stone etc.

Industrial Minerals (Other)

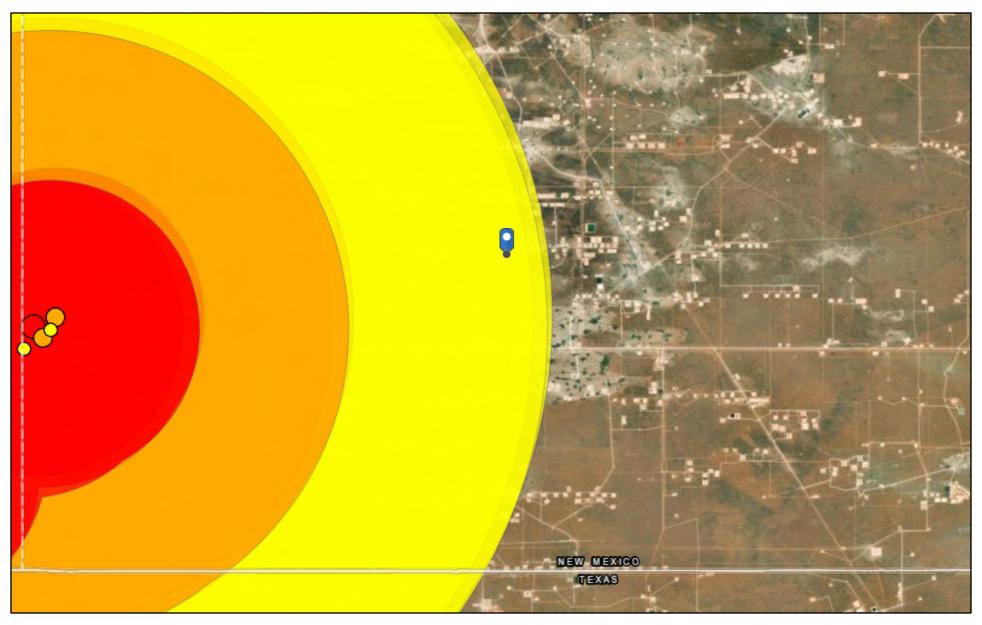


Salt

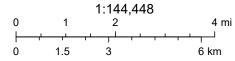


Esri, HERE, Garmin, Earthstar Geographics

OCD Induced Seismicity







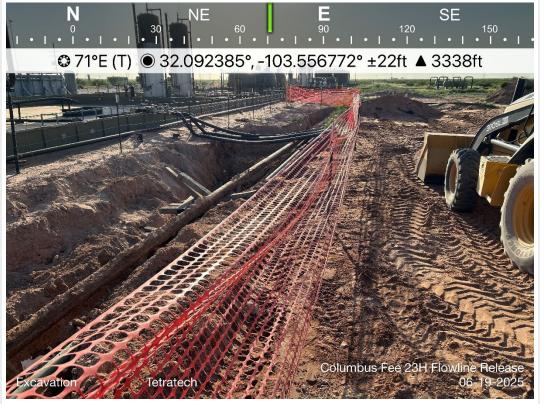
Oil Conservation Division (OCD), Energy, Minerals and Natural Resources Department (EMNRD), Esri, HERE, Garmin, Earthstar Geographics

New Mexico Oil Conservation Division

APPENDIX C Photographic Documentation



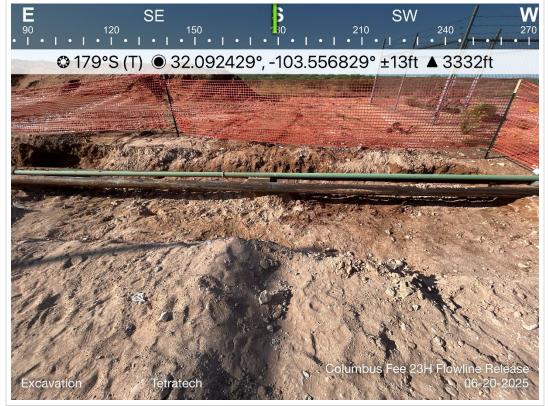
TETRA TECH, INC. PROJECT NO.	DESCRIPTION	View South. Columbus Fee CTB sign on pad	1
212C-MD-03749	SITE NAME	Columbus Fee CTB	7/21/2025



TETRA TECH, INC.	DESCRIPTION	View east. View of excavation extent. View of steel lines and polylines.	2
212C-MD-03749	SITE NAME	Columbus Fee CTB	6/19/2025



TETRA TECH, INC. PROJECT NO.	DESCRIPTION	View east. View of excavation extent. View of steel lines and polylines.	3
212C-MD-03749	SITE NAME	Columbus Fee CTB	6/20/2025



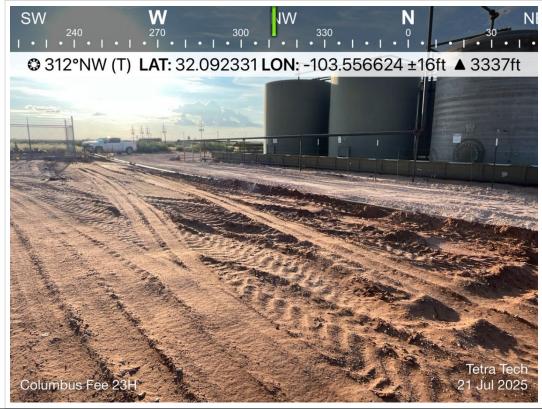
TETRA TECH, INC. DESCRIPTION PROJECT NO.	DESCRIPTION	View south. View of excavation extent. View of steel lines and polylines.	4
212C-MD-03749	SITE NAME	Columbus Fee CTB	6/20/2025



TETRA TECH, INC. PROJECT NO.	DESCRIPTION	View east. View of excavation extent. View of steel lines.	5
212C-MD-03749	SITE NAME	Columbus Fee CTB	6/20/2025



TETRA TECH, INC. PROJECT NO.	DESCRIPTION	View North. View of surface steel lines and polylines. View of facility.	6
212C-MD-03749	SITE NAME	Columbus Fee CTB	6/20/2025



TETRA TECH, INC. PROJECT NO.	DESCRIPTION	View northwest. View of backfilled excavation extent.	7
212C-MD-03749	SITE NAME	Columbus Fee CTB	7/21/2025



TETRA TECH, INC. PROJECT NO.	DESCRIPTION	View northeast. View of backfilled excavation extent.	8
212C-MD-03749	SITE NAME	Columbus Fee CTB	7/21/2025



TETRA TECH, INC. PROJECT NO.	DESCRIPTION	View northeast. View of backfilled excavation extent.	9
212C-MD-03749	SITE NAME	Columbus Fee CTB	7/21/2025



TETRA TECH, INC. PROJECT NO.	DESCRIPTION	View southwest. View of backfilled excavation extent.	10
212C-MD-03749	SITE NAME	Columbus Fee CTB	7/21/2025



TETRA TECH, INC. PROJECT NO.	DESCRIPTION	View southwest. View of water mill.	11
212C-MD-03749	SITE NAME	Columbus Fee CTB	6/23/2025

APPENDIX D Regulatory Correspondence

Searches

Operator Data

Hearing Fee Application

OCD Permitting

Operator Data

Action Search Results

Action Status Item Details

[C-141] Site Char./Remediation Plan C-141 (C-141-V-PLAN) Application

Submission Information

Submission ID:

448306

Districts:

Hobbs

Operator:

[229137] COG OPERATING LLC

Counties:

Lea

Description:

COG OPERATING LLC [229137]

, Columbus Fee 023H

, nAPP2500736394

Status:

APPROVED

Status Date: References (0): 04/07/2025

Forms

Attachments:

Water Sources, Scaled Site Map, Field Data, Soil Contaminant, Water Depth, Boring Logs, Photographs, Topo Aerial Maps, Lab Data, Proposed Technique,

Estimated Volume, Closure Criteria, Proposed Schedule

Questions

Prerequisites

Incident ID (n#)

nAPP2500736394

Incident Name

NAPP2500736394 COLUMBUS FEE 023H @ 0

Incident Type

Release Other

Incident Status Incident Facility Remediation Plan Received

[fAB1909251433] COLUMBUS FEE #23H CTB

Location of Release Source

Please answer all the questions in this group.

Site Name Columbus Fee 023H

Date Release Discovered 12/30/2024 Surface Owner Private

Incident Details

Please answer all the questions in this group.

Release Other Incident Type

Did this release result in a fire or is the result of a fire No Did this release result in any injuries Nο Has this release reached or does it have a reasonable probability of reaching a

watercourse

No

Searches Operator Data Hearing Fee Application

to fresti water

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: Corrosion | Flow Line - Production | Crude Oil | Released: 1 BBL | Recovered: 1 BBL | Lost: 0 BBL.

Produced Water Released (bbls) Details Cause: Corrosion | Flow Line - Production | Produced Water | Released: 13 BBL | Recovered: 1 BBL | Lost: 12

Is the concentration of chloride in the produced water >10,000 mg/l

Condensate Released (bbls) Details

Natural Gas Vented (Mcf) Details

Natural Gas Flared (Mcf) Details

Not answered.

Other Released Details

Are there additional details for the questions above (i.e. any answer containing

Not answered.

Not answered.

Other, Specify, Unknown, and/or Fire, or any negative lost amounts)

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

Unavail

release

release

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

Released materials have been contained via the use of berms or dikes, absorbent

True

pads, or other containment devices

ads, or other containment devices

aged True

All free liquids and recoverable materials have been removed and managed

ropriately

If all the actions described above have not been undertaken, explain why

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 fremedial 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 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 1 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 she 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 do 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: 01/07/2025

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

Direct Measurement

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 Between 1 and 5 (mi.)

Searches Operator Data Hearing Fee Application

Incorporated municipal boundaries or a defined municipal fresh water well field Greater than 5 (mi.)

A wetland Between ½ and 1 (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

A 100-year floodplain Greater than 5 (mi.)

Did the release impact areas not on an exploration, development, production, or No

storage site

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

No

Soil Contamination Sampling: (Provide the highest observable value for each, in milligrams per kilograms.)

 Chloride
 (EPA 300.0 or SM4500 CI B)
 8000

 TPH (GRO+DRO+MRO)
 (EPA SW-846 Method 8015M)
 37420

 GRO+DRO
 (EPA SW-846 Method 8015M)
 34100

 BTEX
 (EPA SW-846 Method 8021B or 8260B)
 663

 Benzene
 (EPA SW-846 Method 8021B or 8260B)
 30.4

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 anticipa beginning and completing the remediation.

On what estimated date will the remediation commence 06/02/2025

On what date will (or did) the final sampling or liner inspection occur 06/04/2025

On what date will (or was) the remediation complete(d) 06/06/2025

What is the estimated surface area (in square feet) that will be reclaimed 528

What is the estimated volume (in cubic yards) that will be remediated 528

What is the estimated volume (in cubic yards) that will be remediated 528

What is the estimated volume (in cubic yards) that will be remediated 103

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 renthen it should consult with the division to determine if another remediation plan submission is required.

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.)

(Ex Situ) Excavation and off-site disposal (i.e. dig and haul, hydrovac, etc.)

Which OCD approved facility will be used for off-site disposal COLUMBUS FEE #23H CTB [fAB1909251433]

OR which OCD approved well (API) will be used for off-site disposal Not answered. OR is the off-site disposal site, to be used, out-of-state Not answered. OR is the off-site disposal site, to be used, an NMED facility Not answered. (Ex Situ) Excavation and on-site remediation (i.e. On-Site Land Farms) Not answered. (In Situ) Soil Vapor Extraction Not answered. (In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.) Not answered. (In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.) Not answered. (In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.) Not answered. Ground Water Abatement pursuant to 19.15.30 NMAC Not answered.

Searches Operator Data Hearing Fee Application

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 do 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: 04/03/2025

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 that the division to determine if another remediation plan submission is required.

Deferral Requests Only

Only answer the questions in this group if seeking a deferral upon approval this submission. Each of the following items must be confirmed as part of any request for deferral of remediation.

Requesting a deferral of the remediation closure due date with the approval of this submission

No

Sampling Event Information

Last sampling notification (C-141N) recorded

{Unavailable.}

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

No

Acknowledgments

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

Comments

No comments found for this submission.

Conditions

Summary:

mailet (4/7/2025), The Remediation Plan is Conditionally Approved. When nearby wells are used to determine depth to groundwater, the wells should be no further than ½ mile away from the site, and data should be no more than 25 years old, and well construction information should be provided. If evidence of depth to ground water within a ½ mile radius of the site cannot be provided, impacted soils will need to meet Table 1 Closure Criteria for ground water at a depth of 50 feet or less. If you feel the depth to groundwater is >100', a shallow borehole can be drilled to 101' allowing for verification of the depth. If water is not visible after reaching bottom-hole and waiting 72 hours, the OCD will accept this as evidence. We would just need a copy of the driller's log.

rhamlet (4/7/2025), Floor confirmation samples should be delineated/excavated to meet closure criteria standards from Table 1 of the OCD Spill Rule for site assessment/characterization/depth to water determination. Sidewall/Edge samples should be delineated/excavated to 600 mg/kg for chlorides and 100 mg/kg for TPH to define the edge of the release. Please make sure that the edge of the release extent is accurately defined, especially around equipment. All off pad areas must meet reclamation standards in the OCD Spill Rule. The work will need to be completed in 90 days after the report has been reviewed.

Reasons

No reasons found for this submission.

Searches Operator Data Hearing Fee Application

1220 South St. Francis Drive | Santa Fe, NM 87505 | P: (505) 476-3200 | F: (505) 476-3220

EMNRD Home OCD Main Page OCD Rules Help

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 475525

QUESTIONS

Operator:	OGRID:
COG OPERATING LLC	229137
600 W Illinois Ave	Action Number:
Midland, TX 79701	475525
	Action Type:
	[NOTIFY] Notification Of Sampling (C-141N)

QUESTIONS

Prerequisites		
Incident ID (n#)	nAPP2500736394	
Incident Name	NAPP2500736394 COLUMBUS FEE 023H @ 0	
Incident Type	Release Other	
Incident Status	Remediation Plan Approved	
Incident Facility	[fAB1909251433] COLUMBUS FEE #23H CTB	

Location of Release Source		
Site Name Columbus Fee 023H		
Date Release Discovered	12/30/2024	
Surface Owner	Private	

Sampling Event General Information	
Please answer all the questions in this group.	
What is the sampling surface area in square feet	528
What is the estimated number of samples that will be gathered	7
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	06/18/2025
Time sampling will commence	04:00 PM
Please provide any information necessary for observers to contact samplers	Contact William B. Erlendson Work:432-895-9810 Email:will.erlendson@tetratech.com
Please provide any information necessary for navigation to sampling site	Columbus Fee 23H Flowline Release Lea County, New Mexico Incident ID: nAPP2500736394 Approximate Release GPS: 32.0923754, -103.5566964

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

CONDITIONS

Action 475525

CONDITIONS

Operator:	OGRID:
COG OPERATING LLC	229137
600 W Illinois Ave	Action Number:
Midland, TX 79701	475525
	Action Type:
	[NOTIFY] Notification Of Sampling (C-141N)

CONDITIONS

Create By	Condition	Condition Date
cllull	Failure to notify the OCD of sampling events including any changes in date/time per the requirements of 19.15.29.12.D.(1).(a) NMAC, may result in the remediation closure samples not being accepted.	6/16/2025
cllull	If confirmation sampling is going to take place over multiple days, individual C-141N applications must be submitted for each sampling date. Date ranges are not currently accepted on the C-141N application.	6/16/2025

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 475527

QUESTIONS

Operator:	OGRID:
COG OPERATING LLC	229137
600 W Illinois Ave	Action Number:
Midland, TX 79701	475527
	Action Type:
	[NOTIFY] Notification Of Sampling (C-141N)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2500736394
Incident Name	NAPP2500736394 COLUMBUS FEE 023H @ 0
Incident Type	Release Other
Incident Status	Remediation Plan Approved
Incident Facility	[fAB1909251433] COLUMBUS FEE #23H CTB

Location of Release Source	
Site Name	Columbus Fee 023H
Date Release Discovered	12/30/2024
Surface Owner	Private

Sampling Event General Information	
Please answer all the questions in this group.	
What is the sampling surface area in square feet	528
What is the estimated number of samples that will be gathered	7
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	06/19/2025
Time sampling will commence	10:00 AM
Please provide any information necessary for observers to contact samplers	Contact William B. Erlendson Work:432-895-9810 Email:will.erlendson@tetratech.com
Please provide any information necessary for navigation to sampling site	Columbus Fee 23H Flowline Release Lea County, New Mexico Incident ID: nAPP2500736394 Approximate Release GPS: 32.0923754, -103.5566964

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

CONDITIONS

Action 475527

CONDITIONS

Operator:	OGRID:
COG OPERATING LLC	229137
600 W Illinois Ave	Action Number:
Midland, TX 79701	475527
	Action Type:
	[NOTIFY] Notification Of Sampling (C-141N)

CONDITIONS

Create By	Condition	Condition Date
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cllull	If confirmation sampling is going to take place over multiple days, individual C-141N applications must be submitted for each sampling date. Date ranges are not currently accepted on the C-141N application.	6/16/2025

Chavira, Lisbeth

From: LISBETH.CHAVIRA@tetratech.com

Subject: FW: (Variance Denied) - C-141N Variance Request - nAPP2500736394

From: Hamlet, Robert, EMNRD < Robert. Hamlet@emnrd.nm.gov >

Sent: Friday, June 20, 2025 12:07 PM

To: Llull, Christian < Christian.Llull@tetratech.com>

Cc: Bratcher, Michael, EMNRD < mike.bratcher@emnrd.nm.gov">; Hall, Brittany, EMNRD < Brittany.Hall@emnrd.nm.gov;

Rodgers, Scott, EMNRD <Scott.Rodgers@emnrd.nm.gov>

Subject: (Variance Denied) - C-141N Variance Request - nAPP2500736394

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

Christian,

There needs to be an unusual, extraordinary, or atypical reason for the 2-business day confirmation sampling notification to not be given in time. Having exceedances of the action levels is not a good reason for a variance of the 2-business day confirmation sampling notification. The variance request is denied. Please make sure the proper 2-business day confirmation sampling notification is made, in case an environmental specialist would like to meet you on site.

Robert Hamlet • Environmental Specialist - Advanced Environmental Bureau

EMNRD - Oil Conservation Division

506 W. Texas Ave.| Artesia, NM 88210

575.909.0302 | robert.hamlet@emnrd.nm.gov

http://www.emnrd.state.nm.us/OCD/



From: Rodgers, Scott, EMNRD < Scott.Rodgers@emnrd.nm.gov >

Sent: Friday, June 20, 2025 10:35 AM

To: Hamlet, Robert, EMNRD < Robert. Hamlet@emnrd.nm.gov>

Cc: Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>; Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>

Subject: FW: [EXTERNAL] C-141N Variance Request - nAPP2500736394

Scott Rodgers ● Environmental Specialist – Adv. Environmental Bureau EMNRD - Oil Conservation Division 5200 Oakland NE, Suite B | Albuquerque, NM 87113

505.469.1830 | scott.rodgers@emnrd.nm.gov

http://www.emnrd.nm.gov/ocd



From: Llull, Christian < Christian.Llull@tetratech.com

Sent: Friday, June 20, 2025 10:31 AM

To: Enviro, OCD, EMNRD < OCD.Enviro@emnrd.nm.gov > Cc: Chavira, Lisbeth < LISBETH.CHAVIRA@tetratech.com >

Subject: [EXTERNAL] C-141N Variance Request - nAPP2500736394

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Good morning,

On behalf of ConocoPhillips, I am requesting a variance to the two-business day notification to continue confirmation sampling outside of the initial notice period.

Confirmation sampling for the subject line incident was conducted yesterday. Analytical results have been received and evaluated, and there are exceedances of the action levels.

Thus, sampling must today (6/20/2025).

Below and attached is the sampling notice submitted through the OCD Permitting portal. Please let me know if any additional information is needed.

Christian

Christian Llull, P.G. (TX, LA) | Program Manager

Direct +1 (512) 338-2861 | Business +1 (512) 338-1667 | Fax +1 (512) 338-1331 | christian.llull@tetratech.com

Tetra Tech | Leading with Science® | OGA

8911 N. Capital of Texas Highway | Bldg. 2, Suite 2310 | Austin, TX 78759 | tetratech.com

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To whom it may concern (c/o Christian LLuLL for COG OPERATING LLC),

The OCD has received the submitted *Notification for (Final) Sampling of a Release* (C-141N), for incident ID (n#) nAPP2500736394.

The sampling event is expected to take place:

When: 06/19/2025 @ 10:00

Where: B-34-25S-33E 0 FNL 0 FEL (32.092300001,-103.556600001)

Additional Information: Contact William B. Erlendson

Work:432-895-9810

Email:will.erlendson@tetratech.com

Additional Instructions: Columbus Fee 23H Flowline Release Lea County, New Mexico Incident ID: nAPP2500736394 Approximate Release GPS: 32.0923754, -103.5566964

An OCD representative may be available onsite at the date and time reported. In the absence or presence of an OCD representative, sampling pursuant to 19.15.29.12.D NMAC is required. Sampling must be performed following an approved sampling plan or pursuant to 19.15.29.12.D.(1).(c) NMAC. 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 sampling events including any changes in date/time per the requirements of 19.15.29.12.D.(1).(a) NMAC, may result in the remediation closure samples not being accepted.
- If confirmation sampling is going to take place over multiple days, individual C-141N applications must be submitted for each sampling date. Date ranges are not currently accepted on the C-141N application.

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

APPENDIX E Laboratory Analytical Data



June 19, 2025

LISBETH CHAVIRA
TETRA TECH
901 WEST WALL STREET , STE 100
MIDLAND, TX 79701

RE: COLUMBUS FEE 23H FLOWLINE RELEASE

Enclosed are the results of analyses for samples received by the laboratory on 06/19/25 12:17.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C25-00101. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab accred certif.html.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2 Haloacetic Acids (HAA-5)
Method EPA 524.2 Total Trihalomethanes (TTHM)
Method EPA 524.4 Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

Celey D. Keine

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene

Lab Director/Quality Manager



Analytical Results For:

TETRA TECH LISBETH CHAVIRA 901 WEST WALL STREET , STE 100 MIDLAND TX, 79701

Fax To: (432) 682-3946

Received: 06/19/2025 Sampling Date: 06/19/2025

Reported: 06/19/2025 Sampling Type: Soil

Project Name: COLUMBUS FEE 23H FLOWLINE RELEASI Sampling Condition: Cool & Intact
Project Number: 212C-MD-03749 Sample Received By: Tamara Oldaker

Project Location: COP - LEA CO NM

Sample ID: FS - 2 (8') (H253668-01)

BTEX 8021B	mg/	ka	Analyze	d By: JH					
DIEX 0021B	ilig/	ng .	Allalyze	u by. 511					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/19/2025	ND	1.81	90.3	2.00	5.99	
Toluene*	<0.050	0.050	06/19/2025	ND	1.89	94.5	2.00	7.08	
Ethylbenzene*	<0.050	0.050	06/19/2025	ND	1.89	94.7	2.00	7.93	
Total Xylenes*	<0.150	0.150	06/19/2025	ND	5.61	93.4	6.00	8.60	
Total BTEX	<0.300	0.300	06/19/2025	ND					
Surrogate: 4-Bromofluorobenzene (PID	94.7	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	848	16.0	06/19/2025	ND	416	104	400	0.00	
TPH 8015M	mg/	'kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/19/2025	ND	210	105	200	3.95	
DRO >C10-C28*	262	10.0	06/19/2025	ND	197	98.6	200	4.65	
EXT DRO >C28-C36	40.0	10.0	06/19/2025	ND					
Surrogate: 1-Chlorooctane	89.4	% 44.4-14	5						
Surrogate: 1-Chlorooctadecane	111 9	% 40.6-15	3						

Cardinal Laboratories *=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whistoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Kreine



Notes and Definitions

ND Analyte NOT DETECTED at or above the reporting limit

RPD Relative Percent Difference

** Samples not received at proper temperature of 6°C or below.

*** Insufficient time to reach temperature.

- Chloride by SM4500Cl-B does not require samples be received at or below 6°C

Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories *=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whistoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results related only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keine

Relinquished By:

Sampler - UPS - Bus - Other: Delivered By: (Circle One)

Corrected Temp. °C O, (Observed Temp. °C

0.2

CHECKED BY: (Initials)

Turnaround Time:

Standard Rush

Bacteria (only) Sample Condition
Cool Intact Observed Temp. °C

Yes Yes
No No Corrected Temp. °C

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST



1	BILL TO	ANALYSIS REQUEST
Project Manager:	P.O. #:	
oldress:	Company: (eta lel)	
State:	Zip:	trade our
Phone #: Fax #:	Address:	
Project #: 2/2C-MD-//3749 Project Owner:	city:	
10	234 Robbing Release State: Zip:	
	Phone #:	
Sampler Name: (illinux Ellens	Fax #:	
0	MATRIX PRESERV. SAMPLING	20
Lab I.D. Sample I.D.	G)RAB OR (C)OMP. CONTAINERS GROUNDWATER WASTEWATER GOIL DIL GLUDGE DTHER: ACID/BASE: CE / COOL DTHER:	The Chlor
[[]-] (p)	8	× ×
	it. III Fulfied to the encount sould by the	client for the
PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims including those for negligence and any other cause whatspower shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the analyses. All claims including those for negligence and any other cause whatspower shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the analyses. All claims including those for negligence and any other cause whatspower shall be demonstrated waived unless made in writing and received by Cardinal within 30 days after completion of the an	to remode for any claim arising whether based in contract or tort, shall be limited to the amount paid by the	e client for the eclient of the applicable
a supplied to light t	PLEASE NOTE: Liability and Damages. Cardinats industry and united by the control of the applicable please in writing and received by Cardinal within 30 days after completion of the applicable analyses. All claims including those for negligence and any other cause whence including within 10 days after completion of the applicable analyses. All claims including those for negligence and any other cause whence including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries,	s subsidiaries,

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

Thermometer ID #140 Correction Factor +0.3°C

REMARKS:



June 20, 2025

CHRISTIAN LLULL
TETRA TECH
901 WEST WALL STREET , STE 100
MIDLAND, TX 79701

RE: COLUMBUS FEE 23H FLOWLINE RELEASE

Enclosed are the results of analyses for samples received by the laboratory on 06/19/25 12:17.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C25-00101. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab accred certif.html.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2 Haloacetic Acids (HAA-5)
Method EPA 524.2 Total Trihalomethanes (TTHM)
Method EPA 524.4 Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

Celey D. Keine

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene

Lab Director/Quality Manager



Analytical Results For:

TETRA TECH CHRISTIAN LLULL 901 WEST WALL STREET , STE 100 MIDLAND TX, 79701

(432) 682-3946

Received: 06/19/2025 Sampling Date: 06/19/2025

Reported: 06/20/2025 Sampling Type: Soil

Fax To:

Project Name: COLUMBUS FEE 23H FLOWLINE RELEASI Sampling Condition: Cool & Intact
Project Number: 212C-MD-03749 Sample Received By: Tamara Oldaker

Applyand By 14

Project Location: COP - LEA CO NM

Sample ID: FS - 1 (1.5') (H253669-01)

DTEV 0021D

BTEX 8021B	mg/	kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/19/2025	ND	1.82	91.0	2.00	1.86	
Toluene*	<0.050	0.050	06/19/2025	ND	1.88	94.1	2.00	0.623	
Ethylbenzene*	<0.050	0.050	06/19/2025	ND	1.91	95.6	2.00	0.338	
Total Xylenes*	<0.150	0.150	06/19/2025	ND	5.91	98.5	6.00	0.0457	
Total BTEX	<0.300	0.300	06/19/2025	ND					
Surrogate: 4-Bromofluorobenzene (PID	114 %	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	06/19/2025	ND	416	104	400	0.00	
TPH 8015M	mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/19/2025	ND	199	99.6	200	3.27	
DRO >C10-C28*	<10.0	10.0	06/19/2025	ND	187	93.4	200	3.28	
EXT DRO >C28-C36	<10.0	10.0	06/19/2025	ND					
Surrogate: 1-Chlorooctane	91.7	% 44.4-14	5						
Surrogate: 1-Chlorooctadecane	92.8	% 40.6-15	3						

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Celey D. Kreene



Analytical Results For:

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

Received: 06/19/2025 Sampling Date: 06/19/2025

Reported: Sampling Type: Soil 06/20/2025

Project Name: COLUMBUS FEE 23H FLOWLINE RELEAS! Sampling Condition: Cool & Intact Sample Received By: Project Number: 212C-MD-03749 Tamara Oldaker

Project Location: COP - LEA CO NM

Sample ID: FS - 3 (4') (H253669-02)

BTEX 8021B	mg/	'kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/19/2025	ND	1.82	91.0	2.00	1.86	
Toluene*	<0.050	0.050	06/19/2025	ND	1.88	94.1	2.00	0.623	
Ethylbenzene*	<0.050	0.050	06/19/2025	ND	1.91	95.6	2.00	0.338	
Total Xylenes*	<0.150	0.150	06/19/2025	ND	5.91	98.5	6.00	0.0457	
Total BTEX	<0.300	0.300	06/19/2025	ND					
Surrogate: 4-Bromofluorobenzene (PID	108 9	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/	'kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	256	16.0	06/19/2025	ND	416	104	400	0.00	
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/19/2025	ND	199	99.6	200	3.27	
DRO >C10-C28*	366	10.0	06/19/2025	ND	187	93.4	200	3.28	
EXT DRO >C28-C36	74.5	10.0	06/19/2025	ND					
Surrogate: 1-Chlorooctane	88.1	% 44.4-14	5						
Surrogate: 1-Chlorooctadecane	94.3	% 40.6-15	3						

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Celey D. Keene



Analytical Results For:

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

Received: 06/19/2025 Sampling Date: 06/19/2025

Reported: 06/20/2025 Sampling Type: Soil

Project Name: COLUMBUS FEE 23H FLOWLINE RELEASI Sampling Condition: Cool & Intact
Project Number: 212C-MD-03749 Sample Received By: Tamara Oldaker

Applyzod By: 14

Project Location: COP - LEA CO NM

ma/ka

Sample ID: WSW - 1 (H253669-03)

RTFY 8021R

B1EX 8021B	mg	/ kg	Anaiyze	a By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/19/2025	ND	1.82	91.0	2.00	1.86	
Toluene*	<0.050	0.050	06/19/2025	ND	1.88	94.1	2.00	0.623	
Ethylbenzene*	<0.050	0.050	06/19/2025	ND	1.91	95.6	2.00	0.338	
Total Xylenes*	<0.150	0.150	06/19/2025	ND	5.91	98.5	6.00	0.0457	
Total BTEX	<0.300	0.300	06/19/2025	ND					
Surrogate: 4-Bromofluorobenzene (PID	116	% 71.5-13	4						
Chloride, SM4500CI-B	mg	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	06/19/2025	ND	416	104	400	0.00	
TPH 8015M	mg	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/19/2025	ND	199	99.6	200	3.27	
DRO >C10-C28*	28.9	10.0	06/19/2025	ND	187	93.4	200	3.28	
EXT DRO >C28-C36	<10.0	10.0	06/19/2025	ND					
Surrogate: 1-Chlorooctane	91.4	% 44.4-14	5						
Surrogate: 1-Chlorooctadecane	93.0	% 40.6-15	3						

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Celey D. Keene



Analytical Results For:

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

Received: 06/19/2025 Sampling Date: 06/19/2025

Reported: Sampling Type: Soil 06/20/2025

Project Name: COLUMBUS FEE 23H FLOWLINE RELEAS! Sampling Condition: Cool & Intact Project Number: 212C-MD-03749 Sample Received By: Tamara Oldaker

Project Location: COP - LEA CO NM

Sample ID: SSW - 1 (H253669-04)

BTEX 8021B	mg/	kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/19/2025	ND	1.82	91.0	2.00	1.86	
Toluene*	<0.050	0.050	06/19/2025	ND	1.88	94.1	2.00	0.623	
Ethylbenzene*	<0.050	0.050	06/19/2025	ND	1.91	95.6	2.00	0.338	
Total Xylenes*	<0.150	0.150	06/19/2025	ND	5.91	98.5	6.00	0.0457	
Total BTEX	<0.300	0.300	06/19/2025	ND					
Surrogate: 4-Bromofluorobenzene (PID	113 9	71.5-13	4						
Chloride, SM4500Cl-B	mg/	kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	128	16.0	06/19/2025	ND	416	104	400	0.00	
TPH 8015M	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/19/2025	ND	199	99.6	200	3.27	
DRO >C10-C28*	74.8	10.0	06/19/2025	ND	187	93.4	200	3.28	
EXT DRO >C28-C36	12.0	10.0	06/19/2025	ND					
Surrogate: 1-Chlorooctane	90.0	% 44.4-14	5						
Surrogate: 1-Chlorooctadecane	92.5	% 40.6-15	3						

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Celey D. Keene



Analytical Results For:

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

Received: 06/19/2025 Sampling Date: 06/19/2025

Reported: 06/20/2025 Sampling Type: Soil

Project Name: COLUMBUS FEE 23H FLOWLINE RELEASI Sampling Condition: Cool & Intact
Project Number: 212C-MD-03749 Sample Received By: Tamara Oldaker

Applyzod By: 14

Project Location: COP - LEA CO NM

ma/ka

Sample ID: NSW - 1 (H253669-05)

RTFY 8021R

BIEX 8021B	mg	/ kg	Anaiyze	a By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/19/2025	ND	1.82	91.0	2.00	1.86	
Toluene*	<0.050	0.050	06/19/2025	ND	1.88	94.1	2.00	0.623	
Ethylbenzene*	<0.050	0.050	06/19/2025	ND	1.91	95.6	2.00	0.338	
Total Xylenes*	<0.150	0.150	06/19/2025	ND	5.91	98.5	6.00	0.0457	
Total BTEX	<0.300	0.300	06/19/2025	ND					
Surrogate: 4-Bromofluorobenzene (PID	108	% 71.5-13	4						
Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	160	16.0	06/19/2025	ND	416	104	400	0.00	
TPH 8015M	mg	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/19/2025	ND	199	99.6	200	3.27	
DRO >C10-C28*	26.8	10.0	06/19/2025	ND	187	93.4	200	3.28	
EXT DRO >C28-C36	<10.0	10.0	06/19/2025	ND					
Surrogate: 1-Chlorooctane	88.7	% 44.4-14	5						
Surrogate: 1-Chlorooctadecane	91.1	% 40.6-15	3						

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Celey D. Keene



Analytical Results For:

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

Received: 06/19/2025 Sampling Date: 06/19/2025

Reported: Sampling Type: Soil 06/20/2025

Project Name: COLUMBUS FEE 23H FLOWLINE RELEAS! Sampling Condition: Cool & Intact Project Number: 212C-MD-03749 Sample Received By: Tamara Oldaker

Project Location: COP - LEA CO NM

Sample ID: ESW - 1 (H253669-06)

BTEX 8021B	mg/	kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/19/2025	ND	1.82	91.0	2.00	1.86	
Toluene*	<0.050	0.050	06/19/2025	ND	1.88	94.1	2.00	0.623	
Ethylbenzene*	<0.050	0.050	06/19/2025	ND	1.91	95.6	2.00	0.338	
Total Xylenes*	<0.150	0.150	06/19/2025	ND	5.91	98.5	6.00	0.0457	
Total BTEX	<0.300	0.300	06/19/2025	ND					
Surrogate: 4-Bromofluorobenzene (PID	116 9	71.5-13	4						
Chloride, SM4500Cl-B	mg/	kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	16.0	06/19/2025	ND	416	104	400	0.00	
TPH 8015M	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/19/2025	ND	199	99.6	200	3.27	
DRO >C10-C28*	58.3	10.0	06/19/2025	ND	187	93.4	200	3.28	
EXT DRO >C28-C36	<10.0	10.0	06/19/2025	ND					
Surrogate: 1-Chlorooctane	96.2	% 44.4-14	5						
Surrogate: 1-Chlorooctadecane	98.1	% 40.6-15	3						

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Celey D. Keene



Notes and Definitions

ND Analyte NOT DETECTED at or above the reporting limit

RPD Relative Percent Difference

** Samples not received at proper temperature of 6°C or below.

*** Insufficient time to reach temperature.

Chloride by SM4500Cl-B does not require samples be received at or below 6°C

Samples reported on an as received basis (wet) unless otherwise noted on report

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Celey D. Keine

Relinquished By:

Sampler - UPS - Bus - Other: Delivered By: (Circle One)

Corrected Temp. °C Observed Temp. °C Time:

Sample Condition
Cool Intact
Pes Pes
No No

CHECKED BY:

Turnaround Time:

Standard Rush 24h

Bacteria (only) Sample Condition
Cool Intact Observed Temp. °C

Yes Yes
No Corrected Temp. °C

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST



(5)	575) 393-2326 FAX (575) 393-2476	476															
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PLEASE NOTE: Liability and Dan analyses. All claims including those senice. In no event shall Cardinal	PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remoty for any claim arising whether based in contract or tort, shall be limited to the amount pour by the current to a real analyses. All claims including those for negligence and any other cause whatboever shall be deemed waved unless made in writing and received by Cardinal within 30 days after completion of the applicable analyses. All claims including those for negligence and any other cause whatboever shall be deemed waved unless made in writing and received by Cardinal within 30 days after completion of the applicable analyses. All claims including those for negligence and any other causes whatboever shall be deemed by the liable for independent of the shall be deemed and the sh	r any clain be deemed ing withou	arising waived limitation	whether based in contract or unless made in writing and run, business interruptions, los	tort, shall be lim aceived by Cardi s of use, or loss	ned to the amount paid by nal within 30 days after co of profits incurred by clien	mpletion of the t, its subsidianie	applicable es,								TR. III	
affiliates or successors arising out Relinquished By:	Refinquished By: Comparison Comparison	y Cardinal Re	regardi	dinal, regardless of whether such claim is Received By:	based upon any	of the above stated reaso	yerbal Result: ☐ Yes ☐ No Add'I Phone #: All Results are emailed. Please provide Email address:	ult: [☐ Yes lailed. Pl	□ No ease pro	Add vide Em	Add'l Phone #: e Email address	ss:				
William Exbrolso	Time: 317	6	V	Received By:	Ma	The second	listella cha	·cha	aning & k	wire & Ketra techi com	a kch	1 Com					

Thermometer ID #140 Correction Factor +0.3°C



June 20, 2025

CHRISTIAN LLULL
TETRA TECH
901 WEST WALL STREET , STE 100
MIDLAND, TX 79701

RE: COLUMBUS FEE 23H FLOWLINE RELEASE

Enclosed are the results of analyses for samples received by the laboratory on 06/20/25 10:20.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C25-00101. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab accred certif.html.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2 Haloacetic Acids (HAA-5)
Method EPA 524.2 Total Trihalomethanes (TTHM)
Method EPA 524.4 Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

Celey D. Keine

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene

Lab Director/Quality Manager



Analytical Results For:

TETRA TECH CHRISTIAN LLULL 901 WEST WALL STREET , STE 100 MIDLAND TX, 79701

Fax To: (432) 682-3946

Received: 06/20/2025 Sampling Date: 06/20/2025

Reported: 06/20/2025 Sampling Type: Soil

Project Name: COLUMBUS FEE 23H FLOWLINE RELEASI Sampling Condition: Cool & Intact
Project Number: 212C-MD-03749 Sample Received By: Alyssa Parras

Project Location: COP - LEA CO NM

Sample ID: FS - 2 (9') (H253696-01)

BTEX 8021B	mg,	'kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/20/2025	ND	1.99	99.5	2.00	5.23	
Toluene*	<0.050	0.050	06/20/2025	ND	2.21	110	2.00	6.46	
Ethylbenzene*	<0.050	0.050	06/20/2025	ND	2.03	102	2.00	5.80	
Total Xylenes*	<0.150	0.150	06/20/2025	ND	6.10	102	6.00	5.98	
Total BTEX	<0.300	0.300	06/20/2025	ND					
Surrogate: 4-Bromofluorobenzene (PID	102 5	% 71.5-13	4						
Chloride, SM4500Cl-B	mg,	'kg	Analyze	d By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	06/20/2025	ND	432	108	400	0.00	
TPH 8015M	mg,	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/20/2025	ND	219	110	200	0.122	
DRO >C10-C28*	89.5	10.0	06/20/2025	ND	205	103	200	0.306	
EXT DRO >C28-C36	26.0	10.0	06/20/2025	ND					
Surrogate: 1-Chlorooctane	115 9	% 44.4-14	5						
Surrogate: 1-Chlorooctadecane	119	% 40.6-15	3						

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Celey D. Keine



Notes and Definitions

ND Analyte NOT DETECTED at or above the reporting limit

RPD Relative Percent Difference

** Samples not received at proper temperature of 6°C or below.

*** Insufficient time to reach temperature.

- Chloride by SM4500Cl-B does not require samples be received at or below 6°C

Samples reported on an as received basis (wet) unless otherwise noted on report

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Celey D. Keene

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST



1	(575) 393-2326 FAX (575) 393-2476	ANALYSIS REQUEST
Project Manager: Charten	P.O. #:	
(Company: Etaleun	
City:	State: Zip: Attn: Cherithan Wil	
Pilone #:	Fax #: Address:	
Project #: 2/2C-MD-13749	Project Owner: City:	
Project Name: Calumbus Fee 23H	34 Pipeline Relegas State: Zip:	
Project Location: Local Cont	3	
Jillian	1	
	MATRIX PRESERV.	SAMPLING
	(G)RAB OR (C)OMP. # CONTAINERS GROUNDWATER WASTEWATER SOIL OIL SLUDGE OTHER: ACID/BASE: ICE / COOL OTHER:	m
1 - 5 - 7	X	9:00 00 00
PLEASE NOTE: Liability and Damages. Cardinal's liabili	PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the	d by the client for the
analyses. All claims including those for negligence and service. In no event shall Cardinal be liable for incidental	analyses. All claims including those for negligence and any other cause windsopered stall be detried wateru unless allow a many and the cause windsopered stall be detried wateru unless allowed to the consequent of the consequent and damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, service. In no event shall Cardinal be liable for incidental or consequental damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, service. In no event shall Cardinal be liable for incidental or consequent advantages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, service. In no event shall Cardinal be liable for incidental or consequent advantages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, service. In no event shall Cardinal be liable for incidental or consequent advantages, including without limitation.	
Relinquished By:		□ Yes emailed. Pi
Relinquished By:	Date: Received By:	REMARKS:
Delivered By: (Circle One)	Sample Condition CH Cool Intact Cyes 1 Yes	Standard Bacteria (only) Sa Rush Cool Intact When Only Yes Yes
Sampler - UPS - Bus - Other:	-	Correction Factor +0.3°C No No Corrected Temp. °C'

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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 499316

QUESTIONS

Operator:	OGRID:
COG OPERATING LLC	229137
600 W Illinois Ave	Action Number:
Midland, TX 79701	499316
	Action Type:
	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2500736394
Incident Name	NAPP2500736394 COLUMBUS FEE 023H @ FAB1909251433
Incident Type	Release Other
Incident Status	Remediation Closure Report Received
Incident Facility	[fAB1909251433] COLUMBUS FEE #23H CTB

Location of Release Source	
Please answer all the questions in this group.	
Site Name	COLUMBUS FEE 023H
Date Release Discovered	12/30/2024
Surface Owner	Private

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: Corrosion Flow Line - Production Crude Oil Released: 1 BBL Recovered: 1 BBL Lost: 0 BBL.
Produced Water Released (bbls) Details	Cause: Corrosion Flow Line - Production Produced Water Released: 13 BBL Recovered: 1 BBL Lost: 12 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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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 499316

QUESTIONS (continued)

QUESTI	ions (continued)
Operator:	OGRID:
COG OPERATING LLC 600 W Illinois Ave	229137 Action Number:
Midland, TX 79701	499316
Wildiana, 177 10101	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	Unavailable.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e.	e. gas only) are to be submitted on the C-129 form.
L	
Initial Response	
The responsible party must undertake the following actions immediately unless they could create a s	T .
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.
	ation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative ted or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of valuation in the follow-up C-141 submission.
to report and/or file certain release notifications and perform corrective actions for releathe OCD does not relieve the operator of liability should their operations have failed to a	knowledge and understand that pursuant to OCD rules and regulations all operators are required asses which may endanger public health or the environment. The acceptance of a C-141 report by adequately investigate and remediate contamination that pose a threat to groundwater, surface t does not relieve the operator of responsibility for compliance with any other federal, state, or
I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 01/07/2025

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QUESTIONS, Page 3

Action 499316

QUESTIONS (continued)

Operator:	OGRID:
COG OPERATING LLC	229137
600 W Illinois Ave	Action Number:
Midland, TX 79701	499316
	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 th 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	Direct Measurement	
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	Between 1 and 5 (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	Between 500 and 1000 (ft.)	
Any other fresh water well or spring	Between 500 and 1000 (ft.)	
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)	
A wetland	Between ½ and 1 (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 ti	hat apply or are indicated. This information must be provided t	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 de	monstrating the lateral and vertical extents of soil contamination	on 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	al extents of contamination been fully delineated	Yes
Was this release entirely c	ontained within a lined containment area	No
Soil Contamination Sampling	g: (Provide the highest observable value for each, in n	nilligrams per kilograms.)
Chloride	(EPA 300.0 or SM4500 CI B)	8000
TPH (GRO+DRO+MRO)	(EPA SW-846 Method 8015M)	37420
GRO+DRO	(EPA SW-846 Method 8015M)	34100
BTEX	(EPA SW-846 Method 8021B or 8260B)	663
Benzene	(EPA SW-846 Method 8021B or 8260B)	30.4
	NMAC unless the site characterization report includes complete the self-ines for beginning and completing the remediation.	ed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAG
On what estimated date wi	Il the remediation commence	06/02/2025
On what date will (or did) to	ne final sampling or liner inspection occur	06/04/2025
On what date will (or was)	the remediation complete(d)	06/06/2025
What is the estimated surfa	ace area (in square feet) that will be reclaimed	528
What is the estimated volu	me (in cubic yards) that will be reclaimed	103
What is the estimated surfa	ace area (in square feet) that will be remediated	528
What is the estimated volu	me (in cubic yards) that will be remediated	103
These estimated dates and measu	rements are recognized to be the best guess or calculation at t	the time of submission and may (be) change(d) over time as more remediation efforts are completed.
The OCD recognizes that propose	ed 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 4

Action 499316

QUESTIONS (continued)

Operator:	OGRID:
COG OPERATING LLC	229137
600 W Illinois Ave	Action Number:
Midland, TX 79701	499316
	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.)	
Yes	
fAB1909251433 COLUMBUS FEE #23H CTB	
Not answered.	
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.

Name: Brittany Esparza
Title: Environmental Technician
Email: brittany.Esparza@ConocoPhillips.com
Date: 08/26/2025

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 5

Action 499316

QUESTIONS (continued)

Operator:	OGRID:
COG OPERATING LLC	229137
600 W Illinois Ave	Action Number:
Midland, TX 79701	499316
	Action Type:
	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Deferral Requests Only	
Only answer the questions in this group if seeking a deferral upon approval this submission. Each of the following items must be confirmed as part of any request for deferral of remediation.	
Requesting a deferral of the remediation closure due date with the approval of this submission	No

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QUESTIONS, Page 6

Action 499316

QUESTIONS (continued)

Operator:	OGRID:
COG OPERATING LLC	229137
600 W Illinois Ave	Action Number:
Midland, TX 79701	499316
	Action Type:
	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	475527
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	06/19/2025
What was the (estimated) number of samples that were to be gathered	7
What was the sampling surface area in square feet	528

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	No
All areas reasonably needed for production or subsequent drilling operations have been stabilized, returned to the sites existing grade, and have a soil cover that prevents ponding of water, minimizing dust and erosion	Yes
What was the total surface area (in square feet) remediated	979.9
What was the total volume (cubic yards) remediated	152
All areas not reasonably needed for production or subsequent drilling operations have been reclaimed to contain a minimum of four feet of non-waste contain earthen material with concentrations less than 600 mg/kg chlorides, 100 mg/kg TPH, 50 mg/kg BTEX, and 10 mg/kg Benzene	Yes
What was the total surface area (in square feet) reclaimed	979.9
What was the total volume (in cubic yards) reclaimed	152
Summarize any additional remediation activities not included by answers (above)	na

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.

Name: Brittany Esparza
Title: Environmental Technician
Email: brittany.Esparza@ConocoPhillips.com
Date: 08/26/2025

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QUESTIONS, Page 7

Action 499316

QUESTIONS (continued)

Operator:	OGRID:
COG OPERATING LLC	229137
600 W Illinois Ave	Action Number:
Midland, TX 79701	499316
	Action Type:
	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Reclamation Report	
Only answer the questions in this group if all reclamation steps have been completed.	
Requesting a reclamation approval with this submission	No

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CONDITIONS

Action 499316

CONDITIONS

Operator:	OGRID:
COG OPERATING LLC	229137
600 W Illinois Ave	Action Number:
Midland, TX 79701	499316
	Action Type:
	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created B		Condition Date
rhamlet	We have received your Remediation Closure Report for Incident #nAPP2500736394 COLUMBUS FEE 023H, thank you. This Remediation Closure Report is approved.	10/7/2025