

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

Form C-141  
Revised August 24, 2018  
Submit to appropriate OCD District office

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party	OGRID
Contact Name	Contact Telephone
Contact email	Incident # (assigned by OCD)
Contact mailing address	

Location of Release Source

Latitude \_\_\_\_\_ Longitude \_\_\_\_\_  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	Site Type
Date Release Discovered	API# (if applicable)

Unit Letter	Section	Township	Range	County

Surface Owner: ☐ State ☐ Federal ☐ Tribal ☐ Private (Name: \_\_\_\_\_)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC?  <input type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?	

### Initial Response

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

<input type="checkbox"/> The source of the release has been stopped.	
<input type="checkbox"/> The impacted area has been secured to protect human health and the environment.	
<input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.	
<input type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why:	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
Printed Name _____	Title: _____
Signature: <u>Battani Espinoza</u>	Date: _____
email: _____	Telephone: _____
<b><u>OCD Only</u></b>	
Received by: _____	Date: _____

Received by OCD: 7/25/2024 9:21:39 AM

Known Area (dropdown):

Released to Imaging: 8/23/2024 2:49:44 PM

Yes	Mapped Area (sq. ft.)	Average Depth (in.)	Percentage of Oil if Spilled Fluid is a Mixture (%.)	Total Estimated Volume of Spill (bbl.)	Total Estimated Volume of Spilled Oil (bbl.)	Total Estimated Spilled Liquid other than Oil (bbl.)
	30	1	25%	0.4469	0.1117	0.3351



July 16, 2024

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

**Re: Reclamation Closure Report  
ConocoPhillips (Heritage COG Production, LLC)  
Windward Federal Com #001H Flowline Release  
Unit Letter D, Section 30, Township 24 South, Range 32 East  
DOR: 6/15/2023  
Lea County, New Mexico  
Incident ID: NAPP2317143514**

Sir or Madam:

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips Company (ConocoPhillips) to assess a release that occurred from a flowline associated with the Windward Federal #001H (API# 30-025-41414) well. The release footprint is located within Public Land Survey System (PLSS) Unit Letter D, Section 30, Township 24 South, Range 32 East, in Lea County, New Mexico (Site). The approximate release point occurred at coordinates 32.194444°, -103.720278° as shown on Figures 1 and 2.

## BACKGROUND

According to the C-141 Initial Report, the release occurred on June 15, 2023, and was caused by a hole in a flowline due to corrosion. Approximately 0.117 barrels (bbls) of oil and 0.3351 bbls of produced water were reported released into a pasture area adjacent to a lease road, and no fluid was recovered. The provided spill calculator indicates a release area of approximately 30 square feet. The approximate release extent presented in Figure 3 was identified based on information provided by ConocoPhillips representatives and a review of photographs taken at the release area. The New Mexico Oil Conservation Division (NMOCD) approved the initial C-141 on June 21, 2023, and assigned the release the Incident ID NAPP2317143514.

## LAND OWNERSHIP

According to the NMOCD Oil and Gas Map, the Site is located on land owned by the Bureau of Land Management (BLM). Tetra Tech requested BLM clearance to remediate via email on October 10, 2023. The BLM cleared the Site for remediation activities via email, following a desktop review conducted by Shelly Taylor of the BLM. The regulatory correspondence is included in Appendix A.

## REMEDIATION CLOSURE REPORT

Tetra Tech conducted release assessment activities on behalf of ConocoPhillips in July and September 2023 to delineate the release and guide the remedial actions taken at the Site within 90 days of discovery of the release. The sampling locations are presented in Figure 3. The analytical results from the 2023 assessment activities are summarized in Table 1. Analytical results associated with sample location BH-1 from the surface to 12 feet bgs exceeded the Site RRAL for TPH. Vertical and horizontal delineation was achieved during the assessment sampling activities.

On behalf of ConocoPhillips, Tetra Tech requested a 90-day extension on September 13, 2023, to complete assessment, remediation, and the associated reporting for the release site. The extension request was



Reclamation Closure Report  
July 16, 2024

ConocoPhillips

approved by Nelson Velez on September 15, 2023, and the remediation due date was updated to December 12, 2023, within the incident page. A copy of the regulatory correspondence is included in Appendix A.

A Release Characterization and Remediation Closure Report (Remediation Closure Report) dated November 8, 2023 was prepared by Tetra Tech on behalf of ConocoPhillips following completion of the remedial activities. The Remediation Closure Report provided the Site Characterization in accordance with 19.15.29.11 NMAC and described the remedial activities performed at the Site in accordance with 19.15.29.12 NMAC. Based on the collected analytical results, Tetra Tech excavated the release extent to a total depth of 12 feet bgs to remove impacted soils. Approximately seventy (70) cubic yards of material were removed during the remedial activities.

The Remediation Closure Report was prepared by Tetra Tech on behalf of ConocoPhillips and submitted to the NMOCD on November 27, 2023. The remediation Closure Report was approved by the NMOCD on January 12, 2024. The Closure Report provided details regarding the reclamation, however, the incident status is listed as *Remediation Closure Report Approved, Pending submission of Reclamation Report from the operator*.

## RECLAMATION ACTIVITIES

In accordance with 19.15.29.13 NMAC, all areas disturbed by the remediation have been reclaimed. 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 chlorides by SM4500Cl-B. The analytical results were directly compared to the reclamation requirements and established Site RRALs to demonstrate compliance. All final confirmation soil samples (floor and sidewall) were below the reclamation limits for chloride, TPH, and BTEX. Excavated areas, depths and confirmation sample locations are indicated in Figure 4. The results of the October 2023 confirmation sampling events are summarized in Table 2.

Once acceptable confirmation sample results were received, the excavation was backfilled with clean material to pre-release grade. In accordance with 19.15.29.12 NMAC, the reclaimed area contained a minimum of four feet of non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg as analyzed by SM4500Cl-B. One (1) representative 5-point composite sample was later collected from the backfill material used for the reclamation of the project site. Soil backfill composite sampling results are summarized in Table 3. Copies of laboratory analysis and chain-of-custody documentation are included in Appendix B.

The soil cover included a top layer consisting of one foot of suitable material to establish vegetation at the site. The backfilled areas in the pasture were seeded following backfilling, to aid in revegetation. Based on the soils of the site, the BLM Seed Mix #2 was used for seeding and was planted in the amount specified in the pounds pure live seed (PLS) per acre.

Site inspections will be performed annually to assess the revegetation progress and evaluate the site for the presence of primary or secondary noxious weeds. If noxious weeds are identified, the NMSLO will be contacted to determine an effective method for eradication. If the site does not show revegetation after one growing season, the area will be reseeded as appropriate. Reclamation activities have been implemented in consultation with the BLM. Photographic documentation of the Site remediation and reclamation activities are presented in Appendix C.

## CONCLUSION

Based on the results of the reclamation activities and confirmation sampling, ConocoPhillips respectfully requests approval of the reclamation associated with this incident. A final re-vegetation report will be submitted when uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent of pre-disturbance levels and a total percent plant cover of at least seventy percent of pre-

Reclamation Closure Report  
July 16, 2024

ConocoPhillips

disturbance levels, excluding noxious weeds. If you have any questions concerning the reclamation activities performed at the Site, please call me at (512) 739-7874.

Sincerely,

**Tetra Tech, Inc.**

A handwritten signature in blue ink, appearing to read 'S. Abbott'.

Samantha Abbott, P.G.  
Project Manager

A handwritten signature in blue ink, appearing to read 'C. Llull'.

Christian M. Llull, P.G.  
Program Manager

cc:  
Mr. Jacob Laird, GPBU – ConocoPhillips

Reclamation Closure Report  
July 16, 2024

ConocoPhillips

## LIST OF ATTACHMENTS

### Figures:

- Figure 1 – Overview Map
- Figure 2 – Topographic Map
- Figure 3 – Site Assessment
- Figure 4 – Remediation Extent and Confirmation Sampling Locations

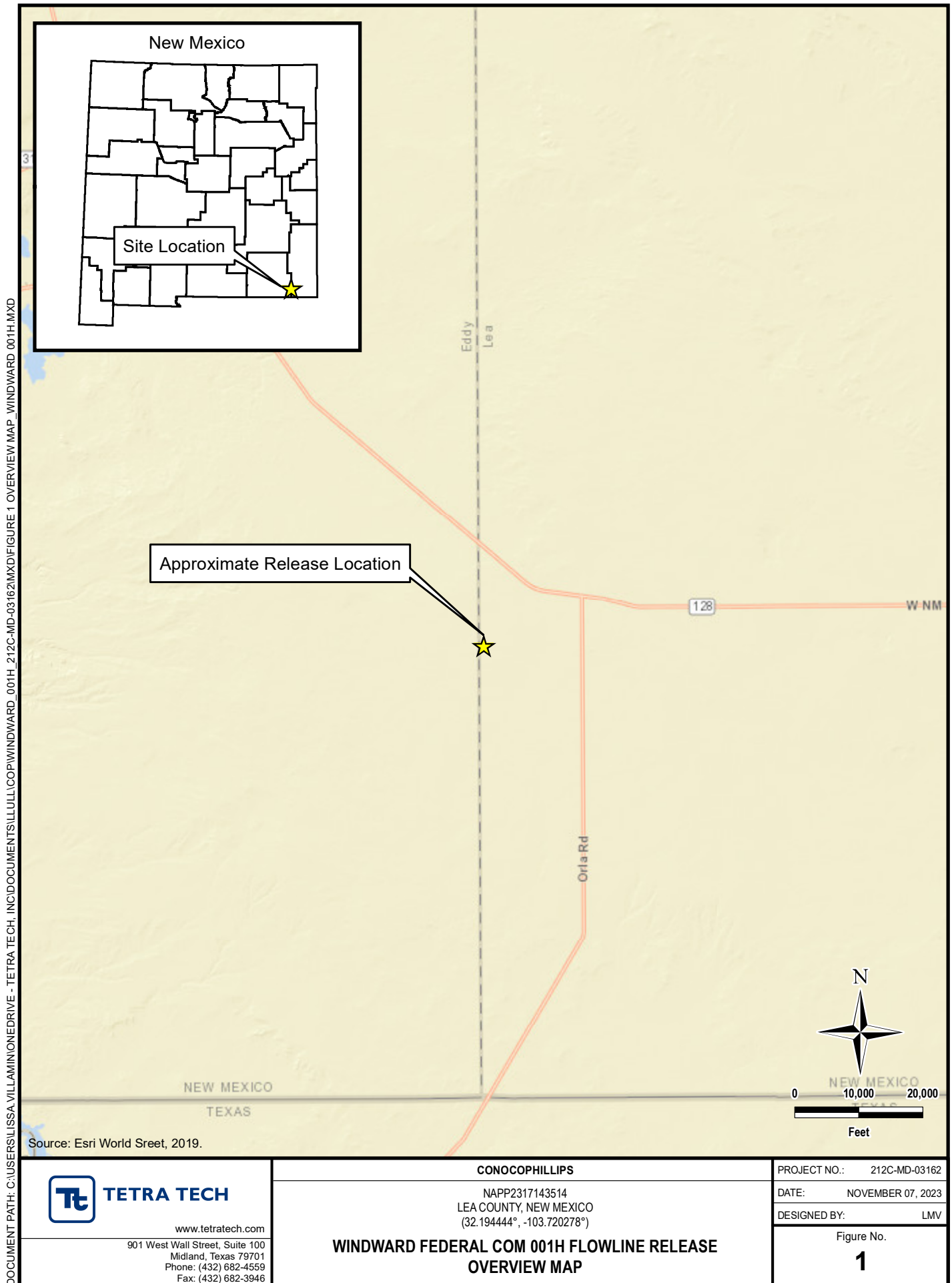
### Tables:

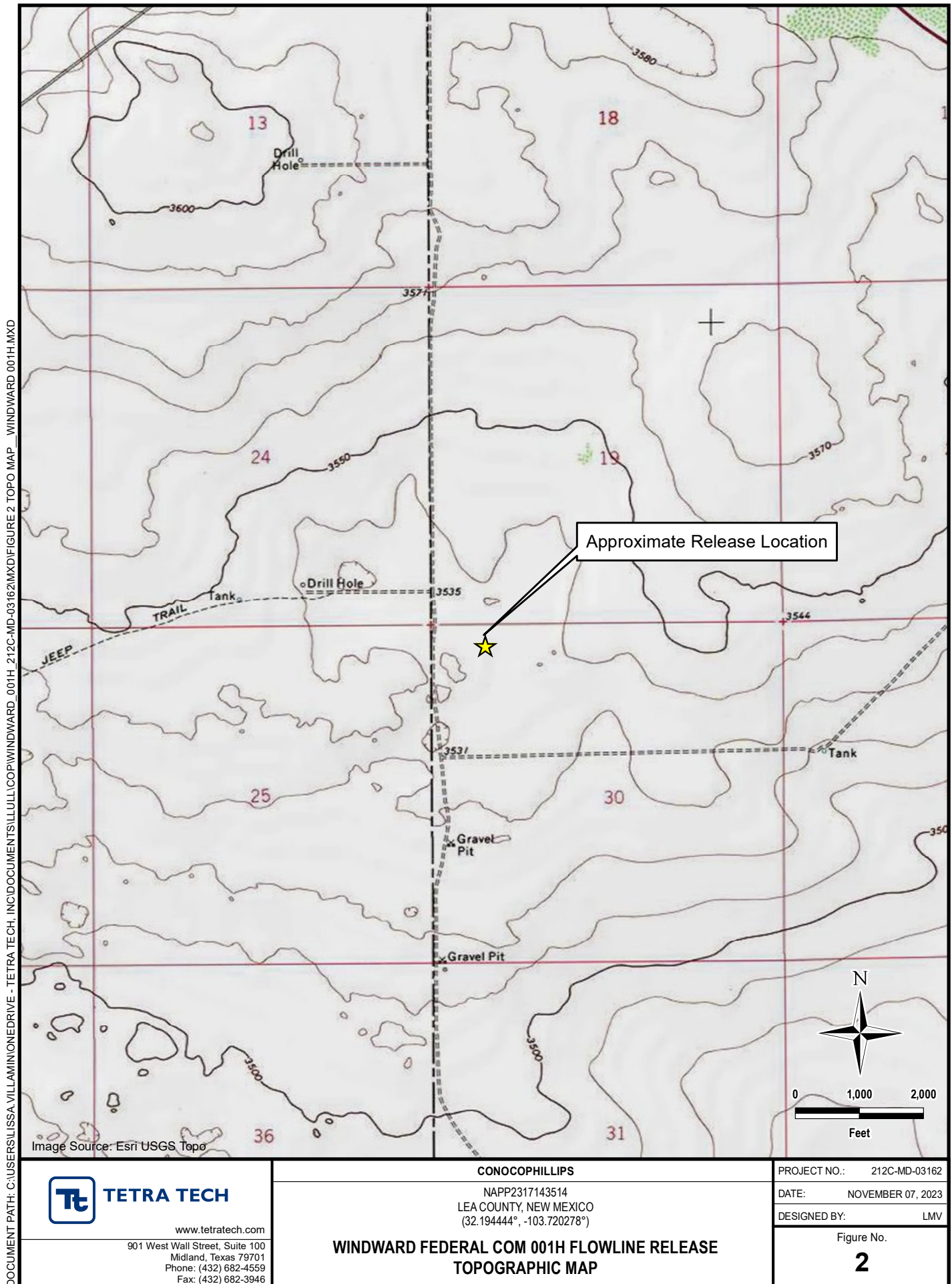
- Table 1 – Summary of Analytical Results – 2023 Soil Assessment
- Table 2 – Summary of Analytical Results – Soil Remediation
- Table 3 – Summary of Analytical Results – Soil Backfill

### Appendices:

- Appendix A – Regulatory Correspondence
- Appendix C – Laboratory Analytical Data
- Appendix C – Photographic Documentation

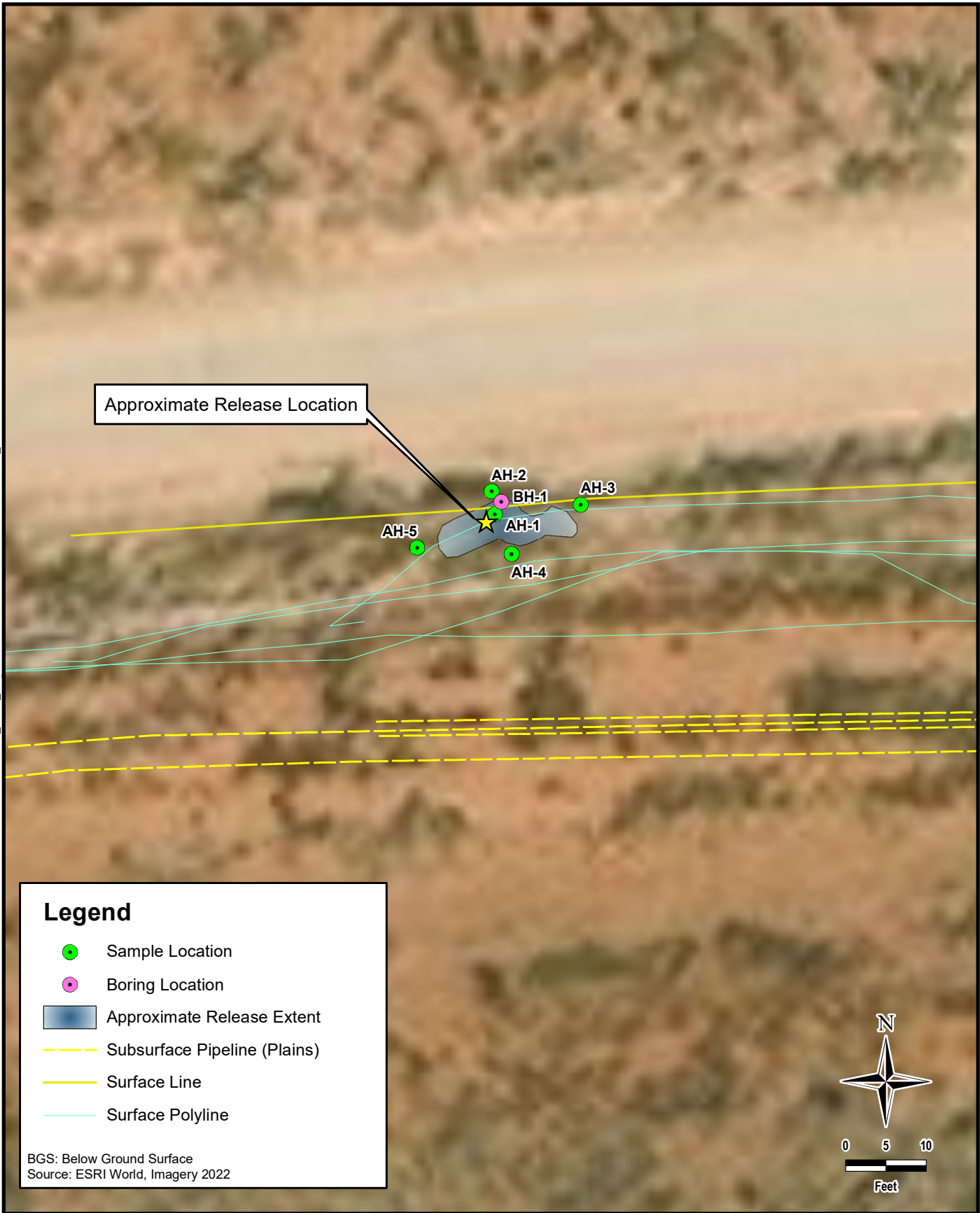
## **FIGURES**






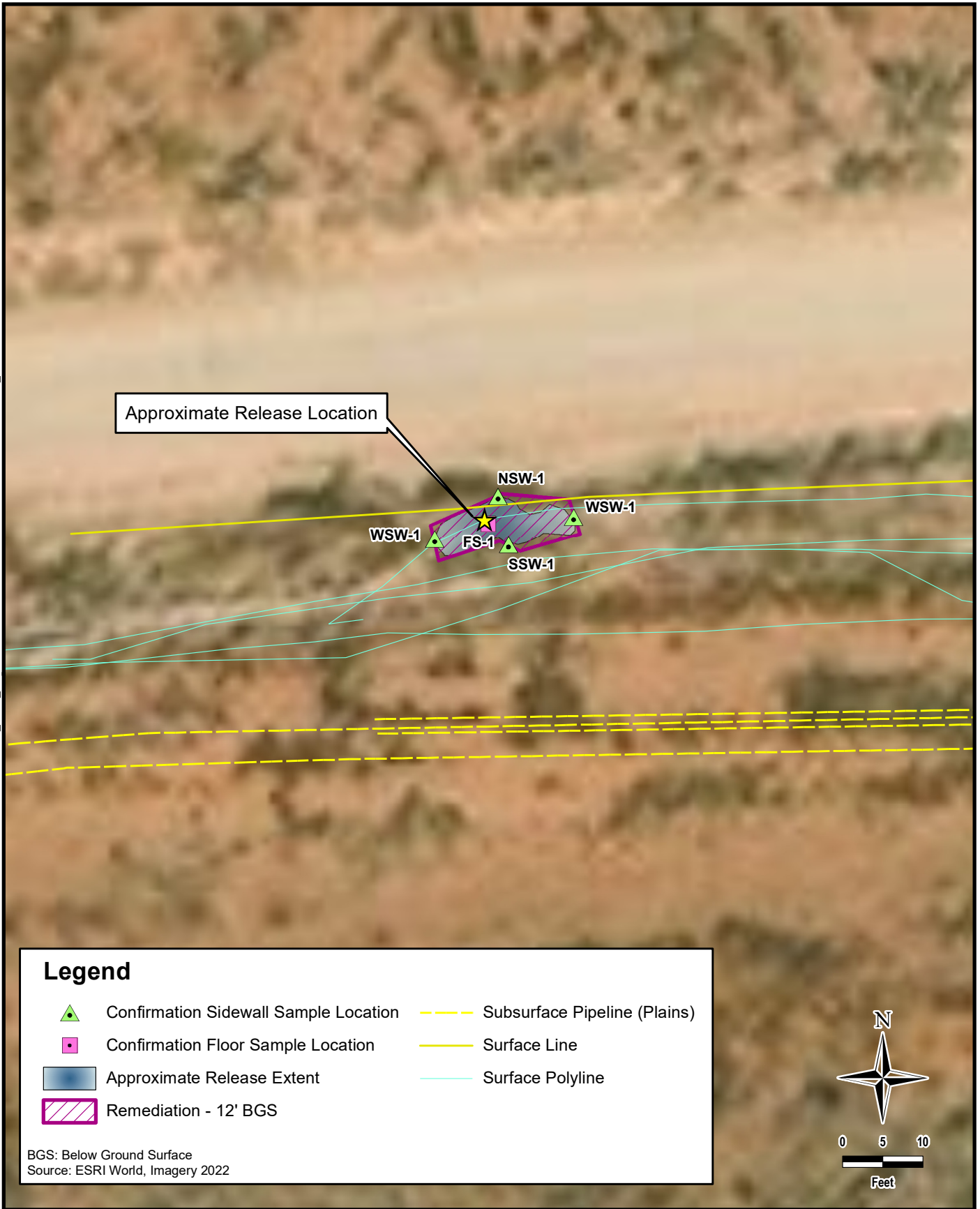



DOCUMENT PATH: C:\USERS\LISSA.VILLAMINIONEDRIVE - TETRA TECH, INC\DOCUMENTS\ILLULL\COPIWINDWARD\_001H\_212C-MD-03162\MXD\FIGURE 3 SITE ASSESS\_WINDWARD\_001H.MXD



 <b>TETRA TECH</b> <a href="http://www.tetrattech.com">www.tetrattech.com</a> 901 West Wall Street, Suite 100 Midland, Texas 79701 Phone: (432) 682-4559 Fax: (432) 682-3946	<b>CONOCOPHILLIPS</b> NAPP2317143514 LEA COUNTY, NEW MEXICO (32.194444°, -103.720278°) <b>WINDWARD FEDERAL COM 001H FLOWLINE RELEASE SITE ASSESSMENT</b>	PROJECT NO.: 212C-MD-03162 DATE: NOVEMBER 07, 2023 DESIGNED BY: LMV Figure No. <b>3</b>
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DOCUMENT PATH: C:\USERS\LISSA.VILLAMINIONEDRIVE - TETRA TECH, INC\DOCUMENTS\ILLULL\COPIWINDWARD\_001H\_212C-MD-03162\MXD\FIGURE 4 REMEDIATION & CONFIRM\_ WINDWARD 001H.MXD



 <b>TETRA TECH</b> <a href="http://www.tetratech.com">www.tetratech.com</a> 901 West Wall Street, Suite 100 Midland, Texas 79701 Phone: (432) 682-4559 Fax: (432) 682-3946	<b>CONOCOPHILLIPS</b> NAPP2317143514 LEA COUNTY, NEW MEXICO (32.194444°, -103.720278°)		PROJECT NO.: 212C-MD-03162
	<b>WINDWARD FEDERAL COM 001H FLOWLINE RELEASE REMEDATION EXTENT AND CONFIRMATION SAMPLING LOCATIONS</b>		DATE: NOVEMBER 07, 2023
			DESIGNED BY: LMV
			Figure No. <b>4</b>



## **TABLES**

TABLE 1  
SUMMARY OF ANALYTICAL RESULTS  
2023 SOIL ASSESSMENT- nAPP2317143514  
CONOCOPHILLIPS  
WINDWARD FEDERAL COM # 001H  
LEA COUNTY, NM

19.15.29.12 NMAC Closure Criteria for Soils Impacted by a Release (>100 ft):					Chlorides <sup>1</sup>		BTEX <sup>2</sup>										TPH <sup>3</sup>							
					< 20,000 mg/kg		< 10 mg/kg		Toluene		Ethylbenzene		Total Xylenes		< 50 mg/kg		GRO		DRO		EXT DRO		< 2,500 mg/kg	
Sample ID	Sample Date	Sample Depth Interval	Field Screening Results		Chloride		Benzene								Total BTEX								Total TPH (GRO+DRO+EXT DRO)	
			Chlorides	PID											C <sub>6</sub> - C <sub>10</sub>		> C <sub>10</sub> - C <sub>28</sub>		> C <sub>28</sub> - C <sub>36</sub>					
		ft. bgs	ppm		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	
AH-1	7/12/2023	0.5-1			<16.0		<0.050		0.26		<0.050	GC-NC	7.47	GC-NC1	7.73	GC-NC1	429		13,600		2,490		<b>16,519</b>	
		3-4			<16.0		<0.200		1.42		<0.200		41.6	GC-NC1	43.0	GC-NC1	1,060		5,440		796		<b>7,296</b>	
		5-6			<b>3,240</b>		7.94		77.2		23.5		149		258		4,620		8,920		1,540		<b>15,080</b>	
AH-2	7/12/2023	0-1	250		160		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		25.5		<10.0		25.5	
AH-3	7/12/2023	0-1	69.3		32.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
AH-4	7/12/2023	0-1	151		80.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
AH-5	7/12/2023	0-1	89.7		48.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		14.3		<10.0		14.3	
BH-1	9/12/2023	0-1			96.0		<0.050		0.248		0.354		6.17		6.77		309		4,920		830		<b>6,059</b>	
		2-3			528		<0.200		3.52		2.95		25.3		31.7		568		5,440		878		<b>6,886</b>	
		4-5			832		0.647		17.0		6.68		46.3		<b>70.6</b>		703		5,100		827		<b>6,630</b>	
		6-7			336		<0.200		3.37		2.77		17.3		23.5		621		6,330		996		<b>7,947</b>	
		8-9			240		<0.500		4.56		3.09		20.8		28.5		994		9,780		1,530		<b>12,304</b>	
		9-10			256		1.32		17.1		5.84		38.7		62.9		1,030		7,540		1,210		<b>9,780</b>	
		12-13			80.0		<0.050		0.621		0.511		3.86		4.99		108		1,890		339		2,337	
		14-15			112		<0.050		<0.050		<0.050		0.200		<0.300		<10.0		54.0		15.0		69.0	

NOTES:

- ft. Feet
- bgs Below ground surface
- mg/kg Milligrams per kilogram
- TPH Total Petroleum Hydrocarbons
- GRO Gasoline range organics
- DRO Diesel range organics
- 1 Method SM4500Cl-B
- 2 Method 8021B
- 3 Method 8015M

***Bold and italicized values indicate exceedance of proposed RRALs and/or Reclamation Requirements.***

Shaded rows indicate intervals removed during the remedial activities.

QUALIFIERS:

TABLE 2  
SUMMARY OF ANALYTICAL RESULTS  
SOIL REMEDIATION - nAPP2317143514  
CONOCOPHILLIPS  
WINDWARD FEDERAL COM # 001H  
LEA COUNTY, NM

Sample ID	Sample Date	Sample Depth	Field Screening Results		Chloride <sup>1</sup>		BTEX <sup>2</sup>										TPH <sup>3</sup>							
			Chloride	PID			Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO		DRO		EXT DRO		Total TPH (GRO+DRO+EXT DRO)	
																	C <sub>6</sub> - C <sub>10</sub>		> C <sub>10</sub> - C <sub>28</sub>		> C <sub>28</sub> - C <sub>36</sub>			
		ft. bgs	ppm		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	
NSW-1	10/17/2023	-	52.5		16		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0	QR-03	<10.0	QR-03	<10.0		-	
SSW-1	10/17/2023	-	52.9		16		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
ESW-1	10/17/2023	-	88.2		<16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
WSW-1	10/17/2023	-	84.9		<16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
FS-1	10/17/2023	12	88.2		96		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	

NOTES:

- ft. Feet
- bgs Below ground surface
- mg/kg Milligrams per kilogram
- TPH Total Petroleum Hydrocarbons
- GRO Gasoline range organics
- DRO Diesel range organics
- 1 Method SM4500Cl-B
- 2 Method 8021B
- 3 Method 8015M

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

QUALIFIERS:

- QR-03 The RPD value for the sample duplicate or MS/MSD was outside of QC acceptance limits due to matrix interference. QC batch accepted based on LCS and/or LCSD recovery and/or RPD values.

TABLE 3  
SUMMARY OF ANALYTICAL RESULTS  
TWIN WELLS BUCKTHORN PIT - SOIL BACKFILL  
CONOCOPHILLIPS  
32.152167°, -103.773445°  
LEA COUNTY, NM

Sample ID	Sample Date	Chloride <sup>1</sup>		BTEX <sup>2</sup>										TPH <sup>3</sup>					
				Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO	DRO		EXT DRO		Total TPH
		mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	C <sub>6</sub> - C <sub>10</sub>	> C <sub>10</sub> - C <sub>28</sub>		> C <sub>28</sub> - C <sub>36</sub>		(GRO+DRO+EXT DRO)
BACKFILL - COMPOSITE	3/26/2024	16		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0			<10.0		-

## NOTES:

ft. Feet

bgs Below ground surface

mg/kg Milligrams per kilogram

TPH Total Petroleum Hydrocarbons

GRO Gasoline range organics

DRO Diesel range organics

1 Method SM4500Cl-B

2 Method 8021B

3 Method 8015M

## **APPENDIX A**

### **Regulatory Correspondence**

**From:** [Velez, Nelson, EMNRD](#)  
**To:** [Abbott, Sam](#)  
**Cc:** [Jacob.Laird@conocophillips.com](#); [Lull, Christian](#); [Chavira, Lisbeth](#); [Bratcher, Michael, EMNRD](#)  
**Subject:** Re: [EXTERNAL] Extension Request - nAPP2317143514 (Windward Federal 1H )  
**Date:** Friday, September 15, 2023 2:34:20 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[Outlook-wtfpi2i0.png](#)

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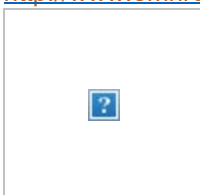
Good afternoon Sam,

Your 90-day time extension request is approved. Remediation Due date has been updated to December 12, 2023 within the incident page.

Please keep a copy of this communication for inclusion within the appropriate report submittal.

Regards,

**Nelson Velez** • Environmental Specialist - Adv  
Environmental Bureau | EMNRD - Oil Conservation Division  
1000 Rio Brazos Road | Aztec, NM 87410  
(505) 469-6146 | [nelson.velez@emnrd.nm.gov](mailto:nelson.velez@emnrd.nm.gov)  
<http://www.emnrd.state.nm.us/OCD/>



---

**From:** Wells, Shelly, EMNRD <[Shelly.Wells@emnrd.nm.gov](mailto:Shelly.Wells@emnrd.nm.gov)>  
**Sent:** Wednesday, September 13, 2023 4:13 PM  
**To:** Velez, Nelson, EMNRD <[Nelson.Velez@emnrd.nm.gov](mailto:Nelson.Velez@emnrd.nm.gov)>  
**Cc:** Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>  
**Subject:** FW: [EXTERNAL] Extension Request - nAPP2317143514 (Windward Federal 1H )

---

**From:** Abbott, Sam <Sam.Abbott@tetrattech.com>  
**Sent:** Wednesday, September 13, 2023 3:18 PM  
**To:** Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>  
**Cc:** Laird, Jacob <Jacob.Laird@conocophillips.com>; Llull, Christian <Christian.Llull@tetrattech.com>; Chavira, Lisbeth <LISBETH.CHAVIRA@tetrattech.com>  
**Subject:** [EXTERNAL] Extension Request - nAPP2317143514 (Windward Federal 1H )

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

To Whom It May Concern,

On behalf of ConocoPhillips, Tetra Tech is requesting an additional 90-day extension (until December 12, 2023) to complete additional assessment activities and associated reporting for the Windward Federal 1H Flowline Release site (**nAPP2317143514**). The release occurred on June 15, 2023, and the initial C-141 Report Form was received by NMOCDD on December 12, 2023. ConocoPhillips immediately commenced pursuing a 90-day (September 13, 2023) release characterization and closure per 19.15.29.11(A) NMAC.

Tetra Tech was onsite on July 12, 2023 to sample and delineate the release on behalf of ConocoPhillips. Horizontal delineation was achieved at this time, but Tetra Tech was not able to complete vertical delineation with a hand auger. After experiencing scheduling delays, Tetra Tech returned to the site with an air rotary drill rig to complete vertical delineation of the release on September 12, 2023. Tetra Tech and ConocoPhillips need additional time to complete evaluation of the additional assessment data, any required remedial actions, and subsequent reporting. A complete report will be submitted to the OCD within the requested timeframe.

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

Thank you in advance,  
Sam

**Samantha Abbott, PG** | Project Manager  
Direct Mobile +1 (512) 739-7874 | Business +1 (512) 338-1667 | [Sam.Abbott@tetrattech.com](mailto:Sam.Abbott@tetrattech.com)

**Tetra Tech, Inc.** | *Leading with Science*<sup>®</sup> | OGA  
8911 N Capital of Texas Hwy #2310 | Austin, TX 78759 | [tetrattech.com](http://tetrattech.com)

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**From:** Taylor, Shelly J  
**To:** Llull, Christian  
**Cc:** Chavira, Lisbeth; Abbott, Sam  
**Subject:** RE: [EXTERNAL] Request for Approval - Remediation (Windward Federal Com 001H Flowline Release)  
**Date:** Thursday, October 12, 2023 4:04:38 PM  
**Attachments:** [image007.png](#)  
[image008.jpg](#)  
[image009.png](#)  
[image010.png](#)  
[image011.png](#)  
[image012.png](#)  
[image013.png](#)

You don't often get email from sjtaylor@blm.gov. [Learn why this is important](#)

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You are cleared to proceed with remedial activities.

Sincerely,

*Shelly J Taylor*

Environmental Protection Specialist  
Realty - Compliance

Bureau of Land Management/Carlsbad Field Office  
620 E. Greene St  
Carlsbad, NM 88220  
Direct 575.234.5706  
Mobile 575.499.6831  
[sjtaylor@blm.gov](mailto:sjtaylor@blm.gov)



**Spill/Release email: BLM\_NM\_CFO\_REALTY\_SPILL@BLM.GOV**

---

**From:** Llull, Christian <Christian.Llull@tetratech.com>  
**Sent:** Tuesday, October 10, 2023 9:07 AM  
**To:** Taylor, Shelly J <sjtaylor@blm.gov>  
**Cc:** Chavira, Lisbeth <LISBETH.CHAVIRA@tetratech.com>; Abbott, Sam <Sam.Abbott@tetratech.com>  
**Subject:** [EXTERNAL] Request for Approval - Remediation (Windward Federal Com 001H Flowline Release)

**This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.**

Hey Shelly,

Good morning! Another small remediation for ConocoPhillips.

Tetra Tech is assisting with the remedial action associated with a previously reported unplanned release that occurred on June 15, 2023.

The work is expected to take 2 days.

The **Windward Federal Com 001H Flowline Release** is an approximate 100 square foot area in pasture, just off a lease road, southwest of the Windward and King Tut batteries.

In order to complete the remediation and the submittal process we are requesting verbal approval to proceed with cleanup at the location listed below. KMZ file attached and screengrab below.

Please let me know if you require any other permitting or compliance items in addition to this email approval before we begin work.

**Name of Release: Windward Federal Com 001H Flowline Release**

**Unit Letter D, Section 30, Township 24 South, Range 32 East**

**Lea County, New Mexico**

**Incident Identification (ID) nAPP2317143514**

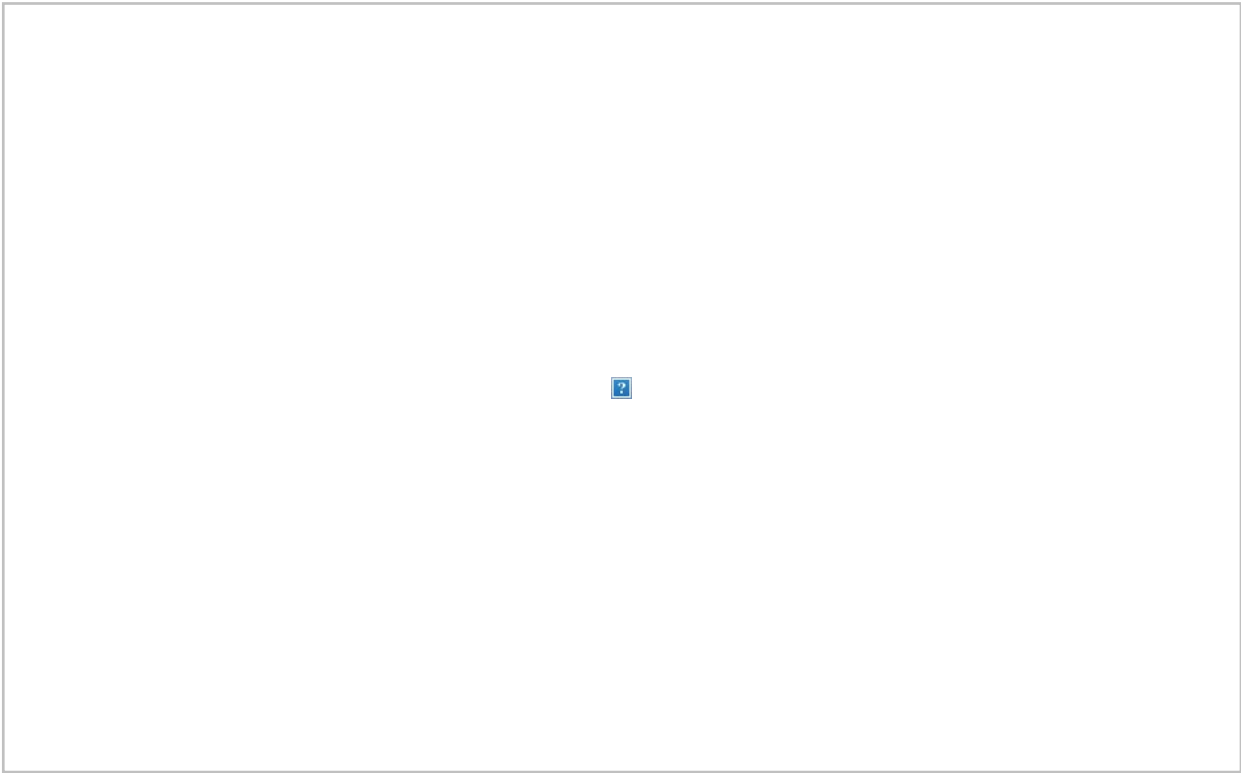
**Approximate Release Location: 32.194444°, -103.720278°**

**Date Release Discovered: June 15, 2023**

**Volume Released: Approximately 0.117 barrels (bbls) of crude oil and 0.3351 bbls of produced water were released.**

**Release in Pasture**





We plan to start work a week from today.  
Please let me know at your earliest convenience if we are clear to remediate?

Thank you in advance.

**Christian Llull, P.G.** | Program Manager  
Mobile +1 (512) 565-0190 | [christian.llull@tetratech.com](mailto:christian.llull@tetratech.com)

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**From:** [Wells, Shelly, EMNRD](#)  
**To:** [Chavira, Lisbeth](#); [Velez, Nelson, EMNRD](#); [Bratcher, Michael, EMNRD](#)  
**Cc:** [Abbott, Sam](#)  
**Subject:** RE: [EXTERNAL] Incident ID: nAPP2317143514 - Confirmation Sampling  
**Date:** Tuesday, October 10, 2023 4:23:56 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

You don't often get email from shelly.wells@emnrd.nm.gov. [Learn why this is important](#)

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Hi Lisbeth,

The OCD has received your notification. Include a copy of this and all notifications in the remedial and/or closure reports to ensure the notifications are documented in the project file.

Thank you,

Shelly

**Shelly Wells \*** Environmental Specialist-Advanced  
Environmental Bureau  
EMNRD-Oil Conservation Division  
1220 S. St. Francis Drive | Santa Fe, NM 87505  
(505)469-7520 | [Shelly.Wells@emnrd.nm.gov](mailto:Shelly.Wells@emnrd.nm.gov)  
<http://www.emnrd.state.nm.us/OCD/>

**From:** Chavira, Lisbeth <LISBETH.CHAVIRA@tetrattech.com>  
**Sent:** Tuesday, October 10, 2023 2:57 PM  
**To:** Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>  
**Cc:** Abbott, Sam <Sam.Abbott@tetrattech.com>  
**Subject:** [EXTERNAL] Incident ID: nAPP2317143514 - Confirmation Sampling

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Incident ID (n#) **nAPP2317143514** (Windward Federal Com 001H Flowline Release)

To whom it may concern,

In accordance with Subsection D of 19.15.29.12 NMAC, the responsible party must verbally notify the appropriate division district office prior to conducting confirmation sampling.

Remediation activities of the release will begin Tuesday, October 17, 2023.

Thus, on behalf of ConocoPhillips for the above referenced incident, Tetra Tech is duly providing this communication which serves as notification that final confirmation sampling will be conducted at this site **Wednesday, October 18, 2023.**

**NOTE:** If you have any questions regarding this sampling schedule, please contact me.

Thank you,

**Lisbeth Chavira** | Staff Geoscientist  
Direct Mobile +1 (512) 596-8201 | [Lisbeth.chavira@tetrattech.com](mailto:Lisbeth.chavira@tetrattech.com)

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## **APPENDIX B**

### **Laboratory Analytical Data**



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

October 18, 2023

SAM ABBOTT

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: WINDWARD FEDERAL COM 001H FL RELEASE

Enclosed are the results of analyses for samples received by the laboratory on 10/17/23 14:28.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-22-15. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

Celey D. Keene

Lab Director/Quality Manager



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

**Analytical Results For:**

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

Received:	10/17/2023	Sampling Date:	10/17/2023
Reported:	10/18/2023	Sampling Type:	Soil
Project Name:	WINDWARD FEDERAL COM 001H FL REI	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03162	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

**Sample ID: NSW - 1 (H235669-01)**

BTEx 8021B			mg/kg		Analyzed By: MS				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/17/2023	ND	1.80	89.8	2.00	1.74	
Toluene*	<0.050	0.050	10/17/2023	ND	1.85	92.4	2.00	0.794	
Ethylbenzene*	<0.050	0.050	10/17/2023	ND	1.85	92.3	2.00	0.405	
Total Xylenes*	<0.150	0.150	10/17/2023	ND	5.52	92.1	6.00	0.691	
Total BTEX	<0.300	0.300	10/17/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 94.2 % 71.5-134

Chloride, SM4500Cl-B			mg/kg		Analyzed By: AC				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	10/18/2023	ND	416	104	400	3.77	

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	10/17/2023	ND	203	102	200	21.4	QR-03
DRO >C10-C28*	<10.0	10.0	10/17/2023	ND	208	104	200	27.3	QR-03
EXT DRO >C28-C36	<10.0	10.0	10/17/2023	ND					

Surrogate: 1-Chlorooctane 88.1 % 48.2-134

Surrogate: 1-Chlorooctadecane 82.9 % 49.1-148

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

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

Received:	10/17/2023	Sampling Date:	10/17/2023
Reported:	10/18/2023	Sampling Type:	Soil
Project Name:	WINDWARD FEDERAL COM 001H FL RE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03162	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

**Sample ID: SSW - 1 (H235669-02)**

BTEx 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/17/2023	ND	1.80	89.8	2.00	1.74	
Toluene*	<0.050	0.050	10/17/2023	ND	1.85	92.4	2.00	0.794	
Ethylbenzene*	<0.050	0.050	10/17/2023	ND	1.85	92.3	2.00	0.405	
Total Xylenes*	<0.150	0.150	10/17/2023	ND	5.52	92.1	6.00	0.691	
Total BTEx	<0.300	0.300	10/17/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 93.3 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	16.0	16.0	10/18/2023	ND	416	104	400	3.77		

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	10/17/2023	ND	203	102	200	21.4	
DRO >C10-C28*	<10.0	10.0	10/17/2023	ND	208	104	200	27.3	
EXT DRO >C28-C36	<10.0	10.0	10/17/2023	ND					

Surrogate: 1-Chlorooctane 74.4 % 48.2-134

Surrogate: 1-Chlorooctadecane 68.0 % 49.1-148

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

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

Received:	10/17/2023	Sampling Date:	10/17/2023
Reported:	10/18/2023	Sampling Type:	Soil
Project Name:	WINDWARD FEDERAL COM 001H FL REI	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03162	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

**Sample ID: ESW - 1 (H235669-03)**

BTEx 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	10/17/2023	ND	1.80	89.8	2.00	1.74		
Toluene*	<0.050	0.050	10/17/2023	ND	1.85	92.4	2.00	0.794		
Ethylbenzene*	<0.050	0.050	10/17/2023	ND	1.85	92.3	2.00	0.405		
Total Xylenes*	<0.150	0.150	10/17/2023	ND	5.52	92.1	6.00	0.691		
Total BTEX	<0.300	0.300	10/17/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 94.6 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	10/18/2023	ND	416	104	400	3.77		

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	10/17/2023	ND	203	102	200	21.4	
DRO >C10-C28*	<10.0	10.0	10/17/2023	ND	208	104	200	27.3	
EXT DRO >C28-C36	<10.0	10.0	10/17/2023	ND					

Surrogate: 1-Chlorooctane 60.0 % 48.2-134

Surrogate: 1-Chlorooctadecane 54.3 % 49.1-148

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager





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**Analytical Results For:**

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

Received:	10/17/2023	Sampling Date:	10/17/2023
Reported:	10/18/2023	Sampling Type:	Soil
Project Name:	WINDWARD FEDERAL COM 001H FL REI	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03162	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

**Sample ID: WSW - 1 (H235669-04)**

BTEx 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	10/17/2023	ND	1.80	89.8	2.00	1.74		
Toluene*	<0.050	0.050	10/17/2023	ND	1.85	92.4	2.00	0.794		
Ethylbenzene*	<0.050	0.050	10/17/2023	ND	1.85	92.3	2.00	0.405		
Total Xylenes*	<0.150	0.150	10/17/2023	ND	5.52	92.1	6.00	0.691		
Total BTEX	<0.300	0.300	10/17/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 95.1 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	10/18/2023	ND	416	104	400	3.77		

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	10/18/2023	ND	203	102	200	21.4	
DRO >C10-C28*	<10.0	10.0	10/18/2023	ND	208	104	200	27.3	
EXT DRO >C28-C36	<10.0	10.0	10/18/2023	ND					

Surrogate: 1-Chlorooctane 115 % 48.2-134

Surrogate: 1-Chlorooctadecane 130 % 49.1-148

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

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

Received:	10/17/2023	Sampling Date:	10/17/2023
Reported:	10/18/2023	Sampling Type:	Soil
Project Name:	WINDWARD FEDERAL COM 001H FL REI	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03162	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

**Sample ID: FS - 1 (H235669-05)**

BTEx 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	10/17/2023	ND	1.80	89.8	2.00	1.74		
Toluene*	<0.050	0.050	10/17/2023	ND	1.85	92.4	2.00	0.794		
Ethylbenzene*	<0.050	0.050	10/17/2023	ND	1.85	92.3	2.00	0.405		
Total Xylenes*	<0.150	0.150	10/17/2023	ND	5.52	92.1	6.00	0.691		
Total BTEX	<0.300	0.300	10/17/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 93.1 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	96.0	16.0	10/18/2023	ND	416	104	400	3.77		

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	10/18/2023	ND	203	102	200	21.4	
DRO >C10-C28*	<10.0	10.0	10/18/2023	ND	208	104	200	27.3	
EXT DRO >C28-C36	<10.0	10.0	10/18/2023	ND					

Surrogate: 1-Chlorooctane 94.1 % 48.2-134

Surrogate: 1-Chlorooctadecane 107 % 49.1-148

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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### Notes and Definitions

S-04	The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
QR-03	The RPD value for the sample duplicate or MS/MSD was outside of QC acceptance limits due to matrix interference. QC batch accepted based on LCS and/or LCSD recovery and/or RPD values.
QR-02	The RPD result exceeded the QC control limits; however, both percent recoveries were acceptable. Sample results for the QC batch were accepted based on percent recoveries and completeness of QC data.
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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A handwritten signature in black ink, appearing to read "Celey D. Keene".

Celey D. Keene, Lab Director/Quality Manager



### CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240  
(575) 393-2326 FAX (575) 393-2476

[illegible]



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

March 27, 2024

SAM ABBOTT

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: TWIN WELLS BUCKTHORN PIT ( BACKFILL SOURCE )

Enclosed are the results of analyses for samples received by the laboratory on 03/26/24 15:15.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-23-16. 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](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

Celey D. Keene

Lab Director/Quality Manager



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

**Analytical Results For:**

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

Received:	03/26/2024	Sampling Date:	03/26/2024
Reported:	03/27/2024	Sampling Type:	Soil
Project Name:	TWIN WELLS BUCKTHORN PIT ( BACKFI	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02999A	Sample Received By:	Tamara Oldaker
Project Location:	COP- LEA CO NM		

**Sample ID: BACKFILL - COMPOSITE (H241559-01)**

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	03/26/2024	ND	2.24	112	2.00	0.883	
Toluene*	<0.050	0.050	03/26/2024	ND	2.19	109	2.00	0.961	
Ethylbenzene*	<0.050	0.050	03/26/2024	ND	2.14	107	2.00	1.01	
Total Xylenes*	<0.150	0.150	03/26/2024	ND	6.23	104	6.00	1.07	
Total BTEX	<0.300	0.300	03/26/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 93.9 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CT					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	03/27/2024	ND	432	108	400	3.77	

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	03/26/2024	ND	226	113	200	0.713	
DRO >C10-C28*	<10.0	10.0	03/26/2024	ND	220	110	200	1.62	
EXT DRO >C28-C36	<10.0	10.0	03/26/2024	ND					

Surrogate: 1-Chlorooctane 103 % 48.2-134

Surrogate: 1-Chlorooctadecane 114 % 49.1-148

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\*=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 whatsoever 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. Keene, Lab Director/Quality Manager



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### Notes and Definitions

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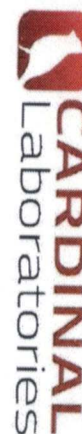
\*=Accredited Analyte

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A handwritten signature in black ink, appearing to read "Caley D. Keene".

Caley D. Keene, Lab Director/Quality Manager





### CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]



## **APPENDIX C**

### **Photographic Documentation**



TETRA TECH, INC. PROJECT NO. 212C-MD-03162	DESCRIPTION	View south of approximate release extent and surface polylines. Staining observed.	1
	SITE NAME	Windward Federal Com #001H Release	7/12/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03162	DESCRIPTION	View east of approximate release extent and surface polylines. Staining observed.	2
	SITE NAME	Windward Federal Com #001H Release	7/12/2023





TETRA TECH, INC. PROJECT NO. 212C-MD-03162	DESCRIPTION	View west of approximate release extent and surface polylines. Staining observed.	3
	SITE NAME	Windward Federal Com #001H Release	7/12/2023

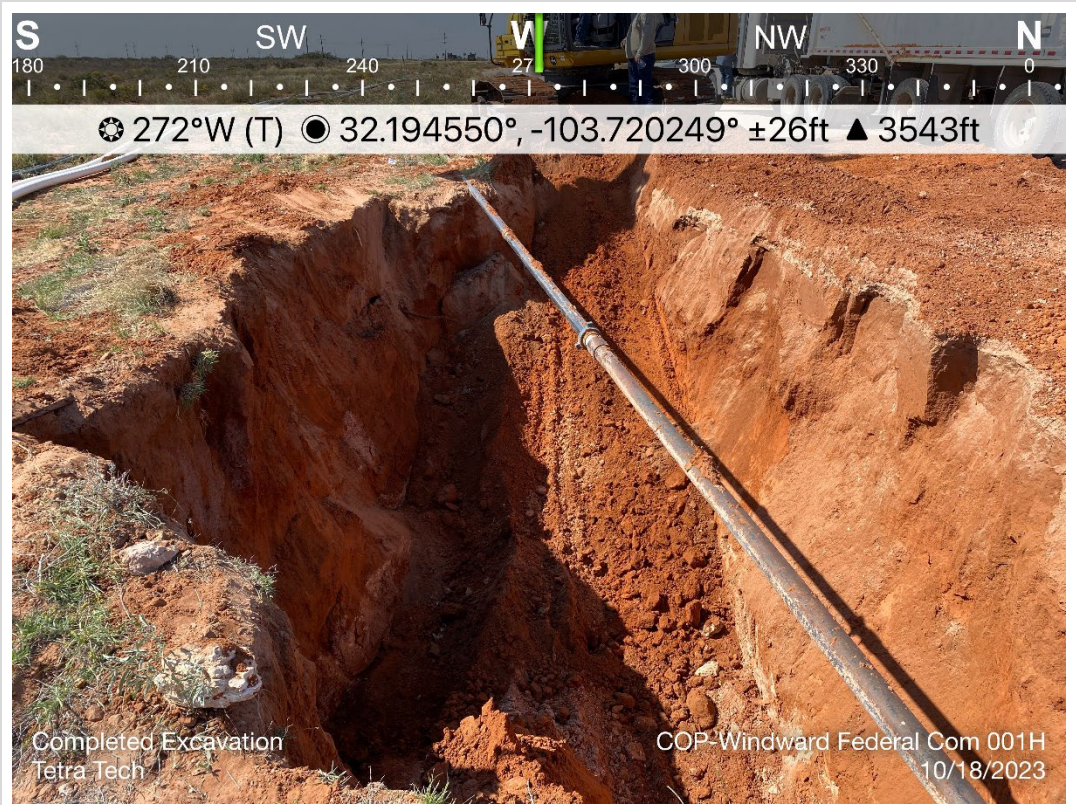


TETRA TECH, INC. PROJECT NO. 212C-MD-03162	DESCRIPTION	View west-southwest of open excavation of approximately 12 ft bgs.	4
	SITE NAME	Windward Federal Com #001H Release	10/18/2023



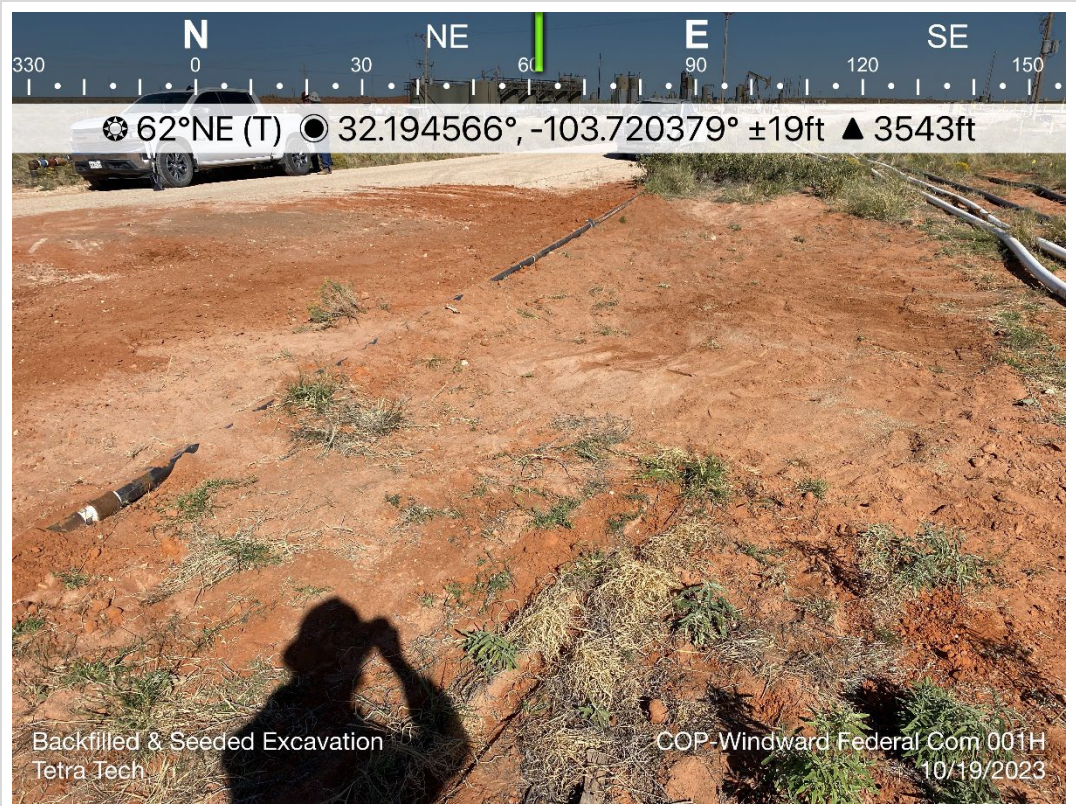


TETRA TECH, INC. PROJECT NO. 212C-MD-03162	DESCRIPTION	View north-northeast of open excavation of approximately 12 ft bgs.	5
	SITE NAME	Windward Federal Com #001H Release	10/18/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03162	DESCRIPTION	View west of open excavation of approximately 12 ft bgs.	6
	SITE NAME	Windward Federal Com #001H Release	10/18/2023



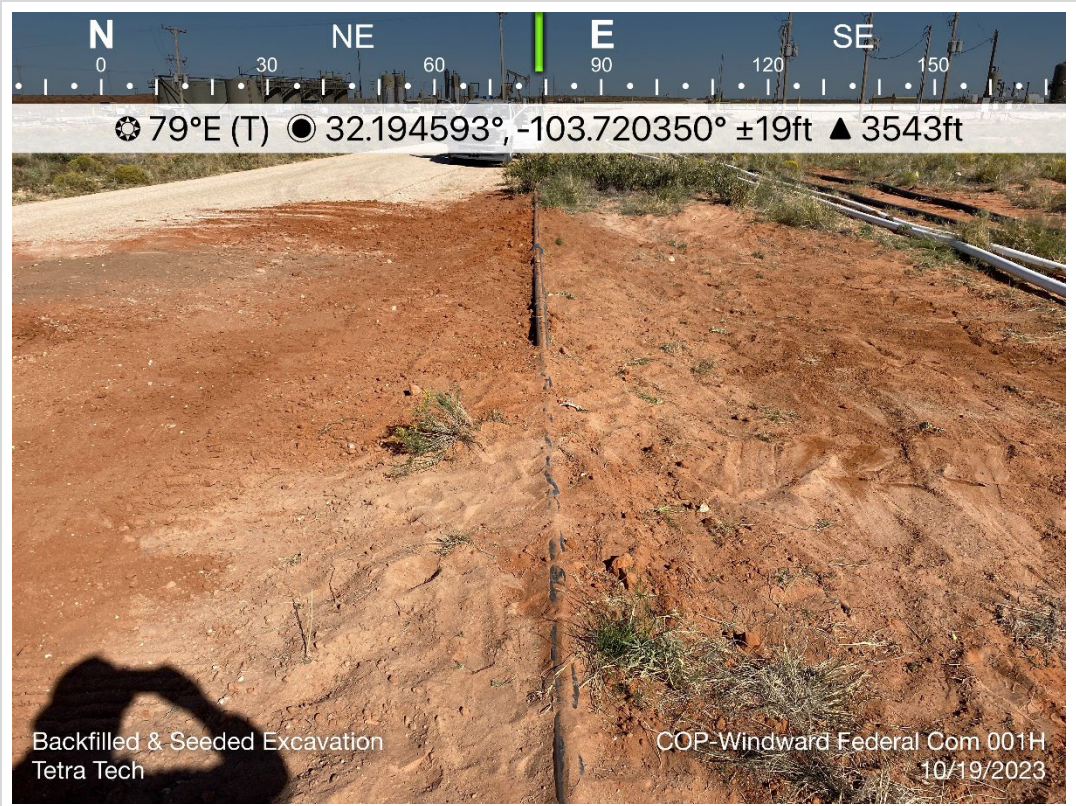


TETRA TECH, INC. PROJECT NO. 212C-MD-03162	DESCRIPTION	View east-northeast of backfilled and seeded excavation. View of reclamation activities.	7
	SITE NAME	Windward Federal Com #001H Release	10/19/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03162	DESCRIPTION	View south-southwest of backfilled and seeded excavation. View of reclamation activities.	8
	SITE NAME	Windward Federal Com #001H Release	10/19/2023





TETRA TECH, INC. PROJECT NO. 212C-MD-03162	DESCRIPTION	View east of backfilled and seeded excavation. View of reclamation activities.	9
	SITE NAME	Windward Federal Com #001H Release	10/19/2023

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

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

QUESTIONS

Action 367228

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:
	229137
	Action Number:
	367228
Action Type:	
[C-141] Reclamation Report C-141 (C-141-v-Reclamation)	

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2317143514
Incident Name	NAPP2317143514 WINDWARD FED 2H - BATTERY @ 0
Incident Type	Oil Release
Incident Status	Reclamation Report Received
Incident Facility	[fAPP2132638253] WINDWARD FED 2H - BATTERY

Location of Release Source	
Please answer all the questions in this group.	
Site Name	WINDWARD FED 2H - BATTERY
Date Release Discovered	06/15/2023
Surface Owner	Federal

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

Nature and Volume of Release	
Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.	
Crude Oil Released (bbls) Details	Cause: Corrosion   Flow Line - Production   Crude Oil   Released: 0 BBL   Recovered: 0 BBL   Lost: 0 BBL.
Produced Water Released (bbls) Details	Cause: Corrosion   Flow Line - Production   Produced Water   Released: 0 BBL   Recovered: 0 BBL   Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	0.117 BBLs Crude, 0.3351 Produced Water

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QUESTIONS, Page 2

Action 367228

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:
	229137
	Action Number:
	367228
Action Type:	
[C-141] Reclamation Report C-141 (C-141-v-Reclamation)	

**QUESTIONS**

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	More info needed to determine if this will be treated as a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Unavailable.
Reasons why this would be considered a submission for a notification of a major release	Unavailable.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.	

**Initial Response**

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

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

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

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 07/25/2024
--	---



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QUESTIONS, Page 3

Action 367228

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:
	229137
	Action Number:
	367228
Action Type:	
[C-141] Reclamation Report C-141 (C-141-v-Reclamation)	

**QUESTIONS****Site Characterization**

Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 100 and 500 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
<b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>	
A continuously flowing watercourse or any other significant watercourse	Greater than 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	Greater than 5 (mi.)
Any other fresh water well or spring	Between 1 and 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1 and 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	None
A 100-year floodplain	Greater than 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

**Remediation Plan**

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

Requesting a remediation plan approval with this submission	Yes
Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No

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

Chloride (EPA 300.0 or SM4500 Cl B)	3240
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	16519
GRO+DRO (EPA SW-846 Method 8015M)	0
BTEX (EPA SW-846 Method 8021B or 8260B)	258
Benzene (EPA SW-846 Method 8021B or 8260B)	8

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

On what estimated date will the remediation commence	10/17/2023
On what date will (or did) the final sampling or liner inspection occur	10/17/2023
On what date will (or was) the remediation complete(d)	10/19/2023
What is the estimated surface area (in square feet) that will be reclaimed	30
What is the estimated volume (in cubic yards) that will be reclaimed	0
What is the estimated surface area (in square feet) that will be remediated	30
What is the estimated volume (in cubic yards) that will be remediated	0

These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.

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

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QUESTIONS, Page 4

Action 367228

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:	229137
	Action Number:	367228
	Action Type:	[C-141] Reclamation Report C-141 (C-141-v-Reclamation)

**QUESTIONS**

<b>Remediation Plan (continued)</b>	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
<b>This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:</b>	
<i>(Select all answers below that apply.)</i>	
(Ex Situ) Excavation and <b>off-site</b> disposal (i.e. dig and haul, hydrovac, etc.)	Yes
Which OCD approved facility will be used for <b>off-site</b> disposal	WINDWARD FEDERAL #002H [fDHR1914358314]
<b>OR</b> which OCD approved well (API) will be used for <b>off-site</b> disposal	Not answered.
<b>OR</b> is the <b>off-site</b> disposal site, to be used, out-of-state	Not answered.
<b>OR</b> is the <b>off-site</b> disposal site, to be used, an NMED facility	Not answered.
(Ex Situ) Excavation and <b>on-site</b> remediation (i.e. On-Site Land Farms)	No
(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.
OTHER (Non-listed remedial process)	Not answered.
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 07/25/2024
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 5  
  
Action 367228

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 367228
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

**QUESTIONS**

<b>Deferral Requests Only</b>	
<i>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.</i>	
Requesting a deferral of the remediation closure due date with the approval of this submission	No

**District I**

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**Santa Fe, NM 87505**

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Action 367228

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:
	229137
	Action Number:
	367228
Action Type:	
[C-141] Reclamation Report C-141 (C-141-v-Reclamation)	

**QUESTIONS**

Sampling Event Information	
Last sampling notification (C-141N) recorded	367245
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	07/12/2023
What was the (estimated) number of samples that were to be gathered	5
What was the sampling surface area in square feet	30

**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	100
What was the total volume (cubic yards) remediated	70
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	100
What was the total volume (in cubic yards) reclaimed	70
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.

I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 07/25/2024
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**District I**

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

**District II**

811 S. First St., Artesia, NM 88210  
Phone:(575) 748-1283 Fax:(575) 748-9720

**District III**

1000 Rio Brazos Rd., Aztec, NM 87410  
Phone:(505) 334-6178 Fax:(505) 334-6170

**District IV**

1220 S. St Francis Dr., Santa Fe, NM 87505  
Phone:(505) 476-3470 Fax:(505) 476-3462

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

QUESTIONS, Page 7

Action 367228

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:	229137
	Action Number:	367228
	Action Type:	[C-141] Reclamation Report C-141 (C-141-v-Reclamation)

**QUESTIONS**

<b>Reclamation Report</b>	
<i>Only answer the questions in this group if all reclamation steps have been completed.</i>	
Requesting a reclamation approval with this submission	Yes
What was the total reclamation surface area (in square feet) for this site	100
What was the total volume of replacement material (in cubic yards) for this site	70
<i>Per Paragraph (1) of Subsection D of 19.15.29.13 NMAC the reclamation must contain a minimum of four feet of non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, or other test methods approved by the division. The soil cover must include a top layer, which is either the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater.</i>	
Is the soil top layer complete and is it suitable material to establish vegetation	Yes
On what (estimated) date will (or was) the reseedling commence(d)	10/19/2023
Summarize any additional reclamation activities not included by answers (above)	"In accordance with 19.15.29.13 NMAC, all areas disturbed by the remediation have been reclaimed. Once acceptable confirmation sample results were received, the excavation was backfilled with clean material to pre-release grade. In accordance with 19.15.29.12 NMAC, the reclaimed area contained a minimum of four feet of non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg as analyzed by SM4500CI-B."
<i>The responsible party must attach information demonstrating they have complied with all applicable reclamation requirements and any conditions or directives of the OCD. This demonstration should be in the form of attachments (in .pdf format) including a scaled site map, any proposed reseedling plans or relevant field notes, photographs of reclaimed area, and a narrative of the reclamation activities. Refer to 19.15.29.13 NMAC.</i>	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.	
I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 07/25/2024

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Oil Conservation Division  
1220 S. St Francis Dr.  
Santa Fe, NM 87505

QUESTIONS, Page 8  
  
Action 367228

QUESTIONS (continued)

Operator:  COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:
	229137
	Action Number:
	367228
Action Type:	
[C-141] Reclamation Report C-141 (C-141-v-Reclamation)	

QUESTIONS

Revegetation Report	
Only answer the questions in this group if all surface restoration, reclamation and re-vegetation obligations have been satisfied.	
Requesting a restoration complete approval with this submission	No
Per Paragraph (4) of Subsection (D) of 19.15.29.13 NMAC for any major or minor release containing liquids, the responsible party must notify the division when reclamation and re-vegetation are complete.	

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CONDITIONS  
  
Action 367228

CONDITIONS

Operator:  COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:
	229137
	Action Number:
	367228
Action Type:	
[C-141] Reclamation Report C-141 (C-141-v-Reclamation)	

CONDITIONS

Created By	Condition	Condition Date
scott.rodgers	All revegetation activities will need to be documented and included in the revegetation report. The revegetation report will need to include: An executive summary of the revegetation activities including: Seed mix, Method of seeding, dates of when the release area was reseeded, information pertinent to inspections, information about any amendments added to the soil, information on how the vegetative cover established meets the life-form ratio of plus or minus fifty percent of pre-disturbance levels and a total percent plant cover of at least seventy percent of pre-disturbance levels, excluding noxious weeds per 19.15.29.13 D.(3) NMAC, and any additional information; a scaled Site Map including area that was revegetated in square feet; and pictures of the revegetated areas during reseeding activities, inspections, and final pictures when revegetation is achieved.	8/23/2024