

Received by OCD: 10/1/2025 1:18:51 PM										L48 Spill Volume Estimate Form - Fill In Gray Cells										Page 1 of 31									
Facility Name & Well Number(s):										SR State Unit 20H Battery										Release Discovery Date & Time: 7.20.25									
Provide any known details about the event:										Tank lost plug due to corrosion										Primary Cause (dropdown):				Secondary Cause (dropdown):					
										Was the Release to Soil / Caliche (dropdown):				Release On/Off Pad (dropdown):		Recovered Volume (bbl.) (if available, not included in volume calculations)				Release Type (dropdown):				Method of Determination (dropdown):					
BU:		Permian		Asset Area:		DBW - Farmland		No				On-Pad						Oil Mixture				Other							
Known Volume (dropdown):										No																			
Known Area (dropdown):										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 Volume of Spilled Liquid other than Oil (bbl.)							
Released to Imaging: 10/16/2025 11:30:52 AM												2300		6		24%		209.8175		50.3562		159.4613							

2135 S. Loop 250 W.
Midland, Texas 79703
United States
www.ghd.com

Our Ref.: 12676593 – NMOCD – 1

September 29, 2025

New Mexico Oil Conservation Division
506 W. Texas Avenue
Artesia, New Mexico 88210

Closure Report
ConocoPhillips Company
SRO State Com #20H
Unit Letter A, Section 03, T26S, R28E
GPS: 32.078100001, -104.06939
Eddy County, New Mexico

1. Introduction

GHD Services Inc. (GHD), on behalf of ConocoPhillips Company (Conoco), has prepared this *Closure Report* to document Site assessment activities at SRO State Com #20H (Site). The purpose of the assessment was to determine the presence or absence of impacts to soil following a release of produced water within a lined containment at the Site. Based on field observations, Conoco is submitting this *Closure Report*, describing Site assessment activities that have occurred and requesting closure for Incident Number nAPP2521031052.

2. Site Description and Release Summary

The Site is in Unit A, Section 3, Township 26 South, Range 28 East in Eddy County, New Mexico (32.078100001° N, 104.06939° W) and is associated with oil and gas exploration and production operations on land managed by the New Mexico State Land Office (SLO).

On July 28, 2025, approximately 160 barrels (bbls) of produced water and 50 bbls of crude oil were released into the lined secondary containment. A vacuum truck was dispatched to the Site to recover free-standing fluids; all 160 bbls of released produced water and 50 bbls of crude oil were recovered from within the lined containment. The release was reported to the New Mexico Oil Conservation Division (NMOCD) on July 29, 2025, and was subsequently assigned Incident Number nAPP2521031052.

3. Site Characterization and Closure Criteria

The Site was characterized to assess applicability of Table I, Closure Criteria for Soils Impacted by a Release, of Title 19, Chapter 15, Part 29 (NMAC 19.15.29) of the New Mexico Administrative Code (NMAC). Results from the characterization desktop review are summarized below and a Site Map is presented on **Figure 1**.

According to the soil survey provided by the United States Department of Agriculture National Resources Conservation Services, the soils located within the Site consists of Reagan-Upton association, 0 to 9 percent slopes. The Site is located within an area of medium karst potential.

Groundwater was determined utilizing the New Mexico Office of the State Engineers (NMOSE) database for registered water wells, no known water sources are located within 0.50-mile radius of the Site. Depth to groundwater at the Site is estimated to be 120 feet below ground surface (ft bgs) based on the nearest groundwater well data. The nearest permitted groundwater well with depth to groundwater data is C 02160 S located approximately 0.89 miles southeast of the Site. The well was completed to a depth of 300 ft bgs in January 1960 with static groundwater documented at 120 feet bgs. A copy of the well referenced record is included in **Attachment A**.

The Site is not within 300 feet of any continuously flowing watercourse or any other significant watercourse. There are no lakebeds, sinkholes or playa lakes within 200 feet of the Site. The closest playa is approximately 0.32 miles southeast of the Site, and the nearest Riverine wetland is 0.56 miles northeast. There are no permanent residence, schools, hospitals, institutions or churches within 300 feet of the Site. A residence may be located approximately 1.17 miles northwest of the Site. The nearest fresh water well utilized for livestock watering is located approximately 0.66 miles southwest of the Site. There are no subsurface mines or 100-year floodplains within 300 feet of the Site. A 100-year floodplain is located approximately 0.3 miles northeast of the Site. The location of the Site is depicted on **Figure 1**. A detailed map of the Site is provided on **Figure 2**. The Site Characterization Documentation is included in **Attachment B**.

Based on the results of the Site Characterization desktop review and not having confirmed depth to groundwater within 0.5 miles of the Site and the medium karst potential, the following NMOCD Table I Closure Criteria (Closure Criteria) apply:

Table 3.1 Closure Criteria for Soils Impacted by a Release (NMAC 19.15.29.12)

Regulatory Standard	Benzene (mg/kg)	BTEX (mg/kg)	TPH (GRO+DRO) (mg/kg)	TPH (GRO+DRO+MRO) (mg/kg)	Chloride (mg/kg)
19.15.29.12 NMAC Table I Closure Criteria for Soils Impacted by a Release.	10	50	---	100	600
Notes:					
--- = not defined. mg/kg = milligrams per kilogram. TPH = total petroleum hydrocarbons. GRO+DRO+MRO = Gasoline Range Organics + Diesel Range Organics + Motor Oil/Lube Range Organics. BTEX = benzene, toluene, ethylbenzene, and xylene.					

4. Site Assessment Activities

The liner inspection notice was provided on September 4, 2025. A liner integrity inspection was performed on September 9, 2025. The liner was visually inspected and no rips, tears, holes, or damages in the liner was observed. The liner was determined to be intact with no integrity issues. Photographic documentation of the liner inspection is presented in **Attachment C**.

5. Closure Request

Based on the liner inspection and assessment activities at the Site, ConocoPhillips Company respectfully requests that no further actions be required, and requests closure for Incident Number nAPP2521031052 be granted.

Should you have any questions or require further information regarding this report, please do not hesitate to contact the undersigned.

Regards,



Kayla Taylor
Senior Project Manager

+1 432 210-5443
kayla.taylor@ghd.com

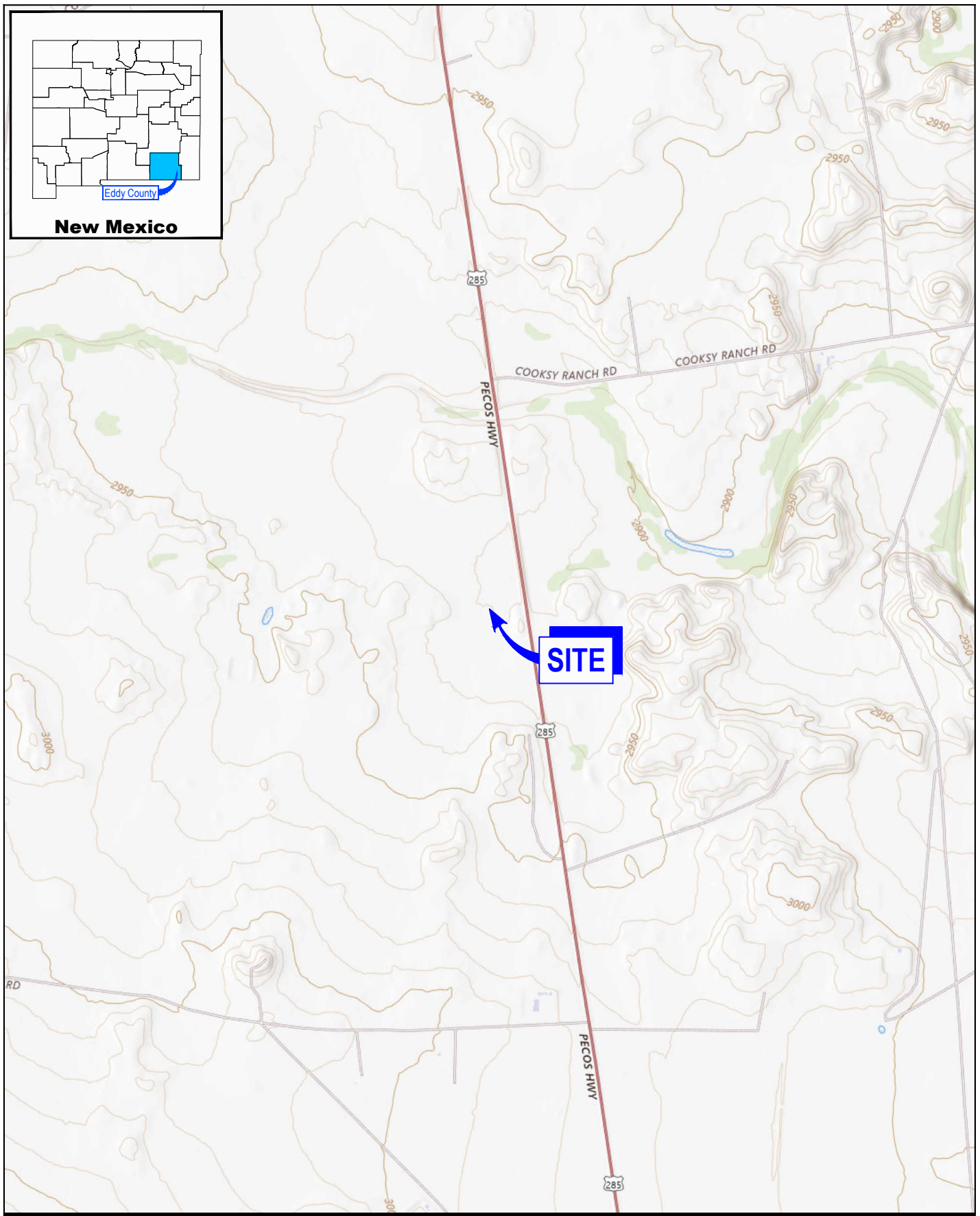
KT/mss/1



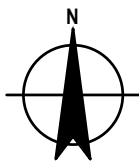
Jessica Wright
Project Director

+1 713 337-5419
jessica.wright@ghd.com

Encl.: Figure 1 - Site Location Map
Figure 2 - Site Details Map
Attachment A - Referenced Well Records
Attachment B - Site Characterization Documentation
Attachment C - Photographic Documentation



0 1000 2000 ft
1" = 2000 ft
Coordinate System:
NAD 1983 State Plane-
New Mexico East (US Feet)



CONOCOPHILLIPS COMPANY
EDDY COUNTY, NEW MEXICO
SRO STATE COM #20H
INCIDENT No. nAPP2521031052

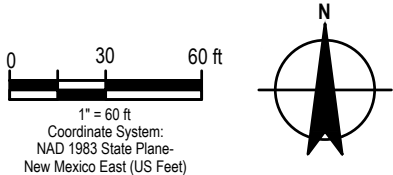
Project No. 12676593
Date September 2025

SITE LOCATION MAP

FIGURE 1

Filename: N:\USIDallas\Agency\CAD\Files\Eight Dint Job Numbers\12676593\12676593-GHD-00-00-RPT-EN-D101_DL-001.dwg

Data Source: USGS 7.5 Minute Quad "Red Bluff, New Mexico"
Lat/Long: 32.078549° North, 104.070438° West



CONOCOPHILLIPS COMPANY
EDDY COUNTY, NEW MEXICO
SRO STATE COM #20H
INCIDENT No. nAPP2521031052

Project No. 12676593
Date September 2025

SITE DETAILS MAP

FIGURE 2

Attachments

Attachment A

Referenced Well Records

Point of Diversion Summary

quarters are 1=NW 2=NE 3=SW 4=SE
quarters are smallest to largest NAD83 UTM in meters

Well Tag	POD Nbr	Q64	Q16	Q4	Sec	Tws	Rng	X	Y	Map
C 02160 S	NW	NW	NE	14	26S	28E	589043.0	3546244.0	*	

* UTM location was derived from PLSS - see Help

Driller License:		Driller Company:		
Driller Name:		HEMLER		
Drill Start Date:		Drill Finish Date:	1960-01-01	Plug Date:
Log File Date:		PCW Rcv Date:		Source: Shallow
Pump Type:		Pipe Discharge Size:		Estimated Yield:
Casing Size:		Depth Well:	300	Depth Water: 120

Meter Information

Meter Number:	3534	Meter Make:	MCC
Meter Serial Number:	06-04-12150	Meter Multiplier:	1.0000
Number of Dials:	2	Meter Type:	Diversion
Unit of Measure:	Acre-Feet	Reading Frequency:	Monthly (No Reading Expected)

Meter Readings (in Acre-Feet)

Read Date	Year	Mtr Reading	Flag	Rdr	Comment	Mtr Amount	Online
2000-09-25	2000	14.464	A	ms		0.000	
2000-10-19	2000	14.987	A	mb		0.523	
2001-01-05	2000	17.244	A	ms		2.257	
2001-04-26	2001	30.952	A	ms		13.708	
2001-07-20	2001	45.445	A	ms		14.493	
2003-04-01	2002	45.445	A	RPT		0.000	
2003-06-03	2003	77.291	A	ms		31.846	
2003-10-29	2003	79.857	A	TW		2.566	
2004-01-06	2003	81.891	A	ab		2.034	

Read Date	Year	Mtr Reading	Flag	Rdr	Comment	Mtr Amount	Online
2004-04-28	2004	88.541	A	TW		6.650	
2004-07-14	2004	97.386	A	TW		8.845	
2004-10-20	2004	8.790	R	TW	Meter Rollover	11.404	
2005-01-03	2004	23.957	A	TW		15.167	
2005-03-30	2005	29.388	A	JW		5.431	
2005-07-06	2005	32.735	A	JW		3.347	
2005-10-18	2005	32.735	A	TW		0.000	
2006-01-05	2005	32.735	A	TW		0.000	
2006-04-05	2006	39.335	A	tw		6.600	
2006-07-06	2006	45.888	A	tw		6.553	
2006-07-06	2006	52.441	A	tw		6.553	
2007-01-04	2006	52.441	A	tw		0.000	
2007-04-27	2007	55.999	A	tw		3.558	
2007-07-03	2007	59.557	A	tw		3.558	
2007-10-14	2007	63.676	A	tw		4.119	
2008-01-02	2007	68.170	A	tw		4.494	
2008-01-03	2008	0.000	A	tw		0.000	
2008-04-15	2008	7.717	A	tw		7.717	
2008-07-16	2008	16.985	A	tw		9.268	
2008-10-02	2008	24.336	A	tw		7.351	
2009-01-14	2008	36.933	A	tw		12.597	
2009-04-15	2009	50.011	A	tw		13.078	
2009-06-07	2009	55.965	A	tw		5.954	
2010-01-06	2009	79.931	A	tw		23.966	
2010-05-13	2010	11.205	R	tw	Meter Rollover	31.274	
2010-12-28	2010	8.684	R	tw	Meter Rollover	97.479	
2011-09-20	2011	38.548	A	tw		29.864	
2012-01-04	2011	64.506	A	tw		25.958	
2012-03-12	2012	65.230	A	tw		0.724	

YTD Meter Amounts:

Year	Amount
2000	2.780
2001	28.201
2002	0.000
2003	36.446
2004	42.066
2005	8.778
2006	19.706
2007	15.729
2008	36.933
2009	42.998
2010	128.753
2011	55.822
2012	0.724

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

9/23/25 9:48 AM MST

Point of Diversion Summary

Attachment B

Site Characterization Documentation

Soil Map—Eddy Area, New Mexico
(Soil Map)



Natural Resources
Conservation Service

Web Soil Survey
National Cooperative Soil Survey

9/12/2025
Page 1 of 3

Soil Map—Eddy Area, New Mexico
(Soil Map)

MAP LEGEND

Area of Interest (AOI)

 Area of Interest (AOI)

Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

Water Features



Streams and Canals

Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

Background



Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:20,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service

Web Soil Survey URL:

Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Eddy Area, New Mexico

Survey Area Data: Version 20, Sep 3, 2024

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Nov 12, 2022—Dec 2, 2022

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.



Natural Resources
Conservation Service

Web Soil Survey
National Cooperative Soil Survey

9/12/2025
Page 2 of 3

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
EC	Ector stony loam, 0 to 9 percent slopes	0.9	24.8%
RE	Reagan-Upton association, 0 to 9 percent slopes	2.7	75.2%
Totals for Area of Interest		3.6	100.0%

Map Unit Description: Reagan-Upton association, 0 to 9 percent slopes---Eddy Area, New Mexico

Soil Description1

Eddy Area, New Mexico

RE—Reagan-Upton association, 0 to 9 percent slopes

Map Unit Setting

National map unit symbol: 1w5d

Elevation: 1,100 to 5,400 feet

Mean annual precipitation: 6 to 14 inches

Mean annual air temperature: 60 to 64 degrees F

Frost-free period: 180 to 240 days

Farmland classification: Farmland of statewide importance

Map Unit Composition

Reagan and similar soils: 70 percent

Upton and similar soils: 25 percent

Minor components: 5 percent

Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Reagan

Setting

Landform: Fan remnants, alluvial fans

Landform position (three-dimensional): Rise

Down-slope shape: Convex, linear

Across-slope shape: Linear

Parent material: Alluvium and/or eolian deposits

Typical profile

H1 - 0 to 8 inches: loam

H2 - 8 to 60 inches: loam

Properties and qualities

Slope: 0 to 3 percent

Depth to restrictive feature: More than 80 inches

Drainage class: Well drained

Runoff class: Low

Capacity of the most limiting layer to transmit water

(Ksat): Moderately high to high (0.60 to 2.00 in/hr)

Depth to water table: More than 80 inches

Frequency of flooding: None

Frequency of ponding: None

Calcium carbonate, maximum content: 40 percent

Maximum salinity: Very slightly saline to moderately saline (2.0 to 8.0 mmhos/cm)

Sodium adsorption ratio, maximum: 1.0

Available water supply, 0 to 60 inches: Moderate (about 8.2 inches)

Interpretive groups

Land capability classification (irrigated): 2e

Land capability classification (nonirrigated): 6e

Map Unit Description: Reagan-Upton association, 0 to 9 percent slopes---Eddy Area, New Mexico

Soil Description1

Hydrologic Soil Group: B
Ecological site: R042CY153NM - Loamy
Hydric soil rating: No

Description of Upton

Setting

Landform: Ridges, fans
Landform position (three-dimensional): Side slope, rise
Down-slope shape: Convex
Across-slope shape: Convex
Parent material: Residuum weathered from limestone

Typical profile

H1 - 0 to 9 inches: gravelly loam
H2 - 9 to 13 inches: gravelly loam
H3 - 13 to 21 inches: cemented
H4 - 21 to 60 inches: very gravelly loam

Properties and qualities

Slope: 0 to 9 percent
Depth to restrictive feature: 7 to 20 inches to petrocalcic
Drainage class: Well drained
Runoff class: High
Capacity of the most limiting layer to transmit water (Ksat): Low to moderately high (0.01 to 0.60 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Calcium carbonate, maximum content: 75 percent
Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)
Sodium adsorption ratio, maximum: 1.0
Available water supply, 0 to 60 inches: Very low (about 1.4 inches)

Interpretive groups

Land capability classification (irrigated): None specified
Land capability classification (nonirrigated): 7s
Hydrologic Soil Group: D
Ecological site: R042CY159NM - Shallow Loamy
Hydric soil rating: No

Minor Components

Atoka

Percent of map unit: 3 percent
Ecological site: R070BC007NM - Loamy
Hydric soil rating: No

Pima

Percent of map unit: 2 percent
Ecological site: R070BC017NM - Bottomland

Map Unit Description: Reagan-Upton association, 0 to 9 percent slopes---Eddy Area, New Mexico

Soil Description1

Hydric soil rating: No

Data Source Information

Soil Survey Area: Eddy Area, New Mexico

Survey Area Data: Version 20, Sep 3, 2024

Karst Potential



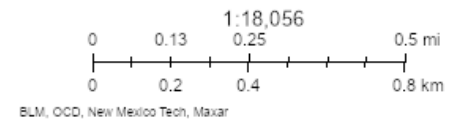
9/12/2025, 2:09:15 PM

Karst Occurrence Potential



Medium

High



New Mexico Oil Conservation Division
NM OCD Oil and Gas Map. <http://nm-emrmd.maps.arcgis.com/apps/webappviewer/index.html?id=4d017f2306164de29fd2fb9f8f35ca75> New Mexico Oil Conservation Division



U.S. Fish and Wildlife Service

National Wetlands Inventory

Wetlands



September 12, 2025

Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond

- Lake
- Other
- Riverine

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.

National Flood Hazard Layer FIRMette



104°4'32"W 32°4'57"N



Released to Imaging: 10/16/2025 10:30:52 AM

Basemap Imagery Source: USGS National Map 2023

Legend

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

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway

OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D

OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
		Area of Undetermined Flood Hazard Zone D

GENERAL STRUCTURES		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall

OTHER FEATURES		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
		17.5 Cross Sections with 1% Annual Chance Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
		Profile Baseline
MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped

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

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

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 9/23/2025 at 3:26 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.

Attachment C

Photographic Documentation

ConocoPhillips Company
SRO State Com #20H
Incident No. nAPP2521031052
Eddy County, New Mexico



Photo 1 View of Site location.



Photo 2 View of Southwest corner of containment facing southwest.



Photo 3 View of western portion of containment facing north.



Photo 4 View of eastern portion of containment facing north.

ConocoPhillips Company
SRO State Com #20H
Incident No. nAPP2521031052
Eddy County, New Mexico



Photo 5 View of southern portion of containment facing east.



Photo 6 View of central portion of containment facing east.



Photo 7 View of central portion of containment facing east.



Photo 8 View of central portion of containment facing east.

ConocoPhillips Company
SRO State Com #20H
Incident No. nAPP2521031052
Eddy County, New Mexico



Photo 9 View of central portion of containment facing east.



Photo 10 View of western portion of containment towards south.



Photo 11 View of northern portion of containment facing southwest.



Photo 12 View of eastern portion of containment facing south.

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 511210

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 511210
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2521031052
Incident Name	NAPP2521031052 SRO STATE COM 20H @ 30-015-41274
Incident Type	Release Other
Incident Status	Remediation Closure Report Received
Incident Well	[30-015-41274] SRO STATE COM #020H

Location of Release Source*Please answer all the questions in this group.*

Site Name	SRO State Com 20H
Date Release Discovered	07/28/2025
Surface Owner	State

Incident Details*Please answer all the questions in this group.*

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

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

Crude Oil Released (bbls) Details	Cause: Other Tank (Any) Crude Oil Released: 50 BBL (Unknown Released Amount) Recovered: 50 BBL Lost: 0 BBL.
Produced Water Released (bbls) Details	Cause: Other Tank (Any) Produced Water Released: 160 BBL Recovered: 160 BBL Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.

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, Page 2

Action 511210

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 511210
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.	

Initial Response

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

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

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

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

I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 10/01/2025
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Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

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

QUESTIONS, Page 3

Action 511210

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 511210
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Site Characterization	
<i>Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 100 and 500 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Between 1000 (ft.) and ½ (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1000 (ft.) and ½ (mi.)
An occupied permanent residence, school, hospital, institution, or church	Between 1 and 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between ½ and 1 (mi.)
Any other fresh water well or spring	Between ½ and 1 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1000 (ft.) and ½ (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	Medium
A 100-year floodplain	Between 1000 (ft.) and ½ (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
On what estimated date will the remediation commence	09/09/2025
On what date will (or did) the final sampling or liner inspection occur	09/09/2025
On what date will (or was) the remediation complete(d)	09/08/2025
What is the estimated surface area (in square feet) that will be remediated	4600
What is the estimated volume (in cubic yards) that will be remediated	0
<i>These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.</i>	
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 4

Action 511210

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 511210
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Remediation Plan (continued)	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:	
<i>(Select all answers below that apply.)</i>	
Is (or was) there affected material present needing to be removed	Yes
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	No
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 10/01/2025
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 6

Action 511210

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 511210
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	502906
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	09/09/2025
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	4600

Remediation Closure Request	
<i>Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.</i>	
Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
What was the total surface area (in square feet) remediated	4600
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	Liner Inspection Closure
<i>The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (in .pdf format) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.</i>	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.	
I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 10/01/2025

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CONDITIONS

Action 511210

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 511210
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
scott.rodgers	App ID 511210 Liner Inspection approved	10/16/2025