



September 3, 2025

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

**Re: Re-Vegetation Closure Report
ConocoPhillips
Super Cobra State Com #001H Flowline Release
Unit Letter P, Section 13, Township 19 South, Range 34 East
Lea County, New Mexico
Incident ID: nAPP2310336759**

Sir or Madam:

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips Company (ConocoPhillips) to assess re-vegetation progress at a Heritage COG Operating Inc. release following completion of remediation and reclamation actions. The former Super Cobra State Com 1H release footprint is located in Public Land Survey System (PLSS) Unit Letter P, Section 13, Township 19 South, Range 34 East, in Lea County, New Mexico (Site). The approximate release point occurred at coordinates 32.656445°, -103.505552°, as shown on Figures 1 and 2.

BACKGROUND

According to the State of New Mexico Oil Conservation Division (NMOCD) C-141 Initial Report, the release was caused by a pin hole in a produced water polyethylene flow line on March 30, 2023. Approximately 8.31 barrels (bbls) of produced water were released, of which approximately 1 bbl was recovered with a vacuum truck. The release impacted approximately 622 square feet of pasture adjacent to a lease road on State Land, as indicated on Figure 3. The NMOCD received the initial C-141 on April 13, 2023, and subsequently assigned the release the Incident ID nAPP2310336759.

LAND OWNERSHIP AND PERMITTING

The Site is located on land owned by the New Mexico State Land Office (NMSLO). The Site is located under Lease ID is VB18570001Concho Oil & Gas/COG Operating LLC. On behalf of ConocoPhillips, Tetra Tech contracted with SWCA Environmental Consultants (SWCA) to conduct an Archaeological Resources Management Section (ARMS) review for this inadvertent release prior to the commencement of any intrusive work.

Alissa Healy, SWCA Archaeologist, submitted an ARMS letter to the NMSLO on behalf of Tetra Tech and ConocoPhillips on May 8, 2023. The redacted ARMS review letter was submitted to NMSLO by SWCA and is included in previous reporting for this incident.

REMEDIATION CLOSURE REPORT AND OCD APPROVAL

A Closure Report (Remediation Closure Report) dated August 29, 2023, was prepared by Tetra Tech on behalf of ConocoPhillips following completion of remediation 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 4 feet bgs to remove impacted soils.

Re-Vegetation Closure Report
September 3, 2025

ConocoPhillips

Approximately one hundred and thirty-two (132) 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 September 7, 2023. The remediation Closure Report was approved by the NMOCD on December 29, 2029. As this incident occurred on State Trust Lands, a copy of the remediation Closure Report was submitted to the NMSLO for review. On September 11, 2023, the NMSLO approved the closure report via email.

RECLAMATION CLOSURE REPORT AND OCD APPROVAL

A Reclamation Closure Report dated September 13, 2024, was prepared by Tetra Tech on behalf of ConocoPhillips to provide documentation of the reclamation activities performed at the Site in accordance with 19.15.29.13 NMAC. Figures 1-5 from the Reclamation Closure Report, illustrating the assessment sampling locations and remediation extents, are included as attachments in this report for reference.

Once acceptable confirmation sample results were received, the excavation was backfilled with clean material to pre-release grade. The soil cover included a top layer consisting of one foot of suitable material to establish vegetation at the Site. The backfilled areas were seeded to aid in re-vegetation. Based on the soils at the Site, the NMSLO Sandy Loamy (SL) Sites Seed Mixture was used for seeding and planted in the amount specified in the pounds pure live seed (PLS) per acre. The Reclamation Closure Report was approved by the NMOCD on October 23, 2024.

SITE RESTORATION AND RE-VEGETATION

Tetra Tech personnel conducted a visual Site inspection on May 29, 2025, to assess the re-vegetation progress and evaluate current Site conditions. Photographic documentation from the May 29, 2025 Site inspection is included in Attachment A.

Based on observations made during the Site inspection, 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-disturbance levels, excluding noxious weeds, in accordance with 19.15.29.13 NMAC. Documentation of the vegetation survey is presented in Attachment B.

CONCLUSION

Based on the results of the restoration, reclamation, and re-vegetation activities, ConocoPhillips respectfully requests approval of the re-vegetation associated with this incident. If you have any questions concerning the reclamation activities performed at the Site, please call me at (512) 739-7874.

Sincerely,
Tetra Tech, Inc.



Samantha K. Abbott, P.G.
Senior Project Manager



Lisbeth Chavira
Project Manager

cc:
Mr. Jacob Laird, GPBU – ConocoPhillips

Re-Vegetation Closure Report
September 3, 2025

ConocoPhillips

LIST OF ATTACHMENTS

Figure 1 – Overview Map

Figure 2 – Topographic Map

Figure 3 – Approximate Release Extent

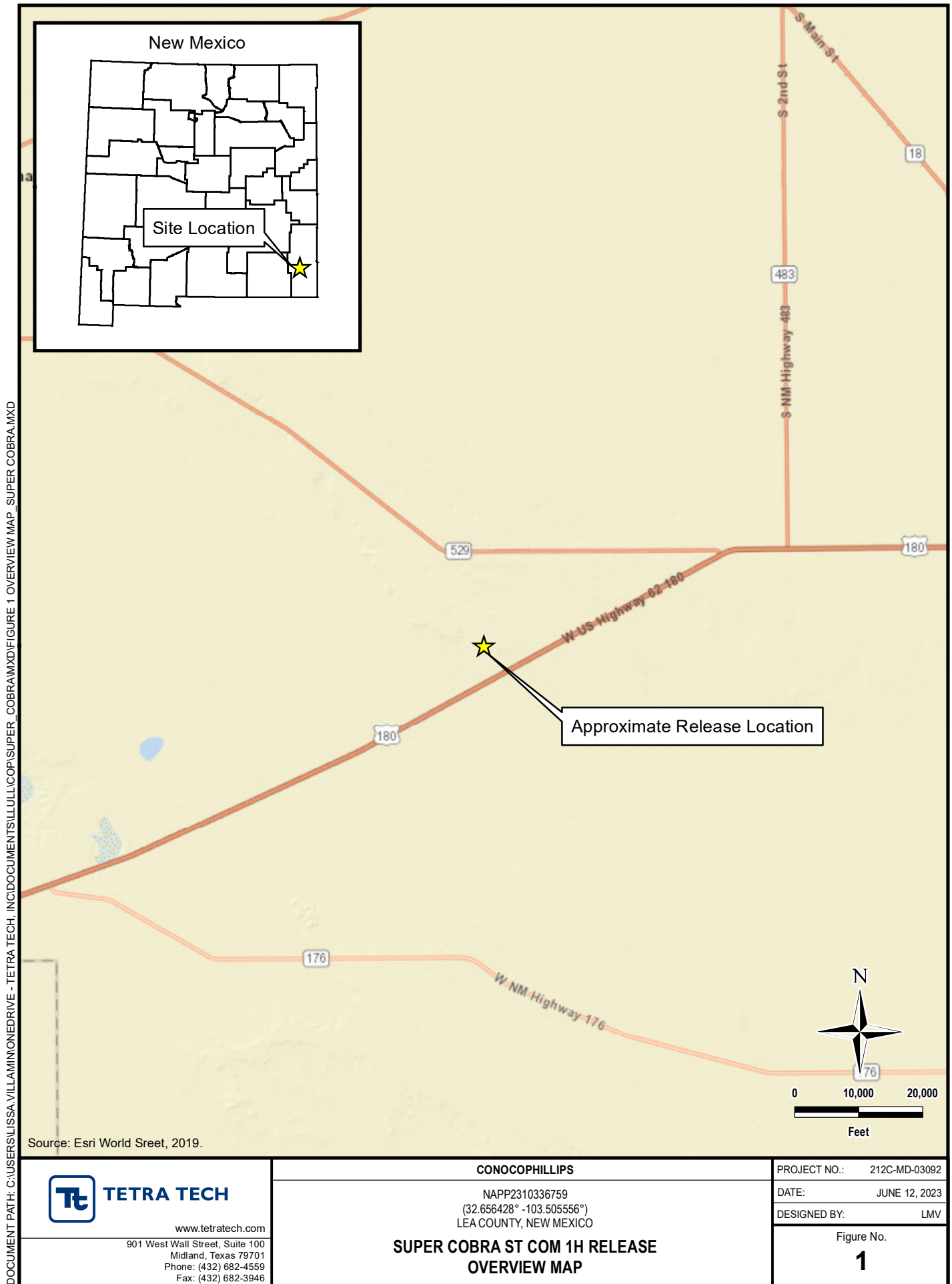
Figure 4 – Site Assessment Map

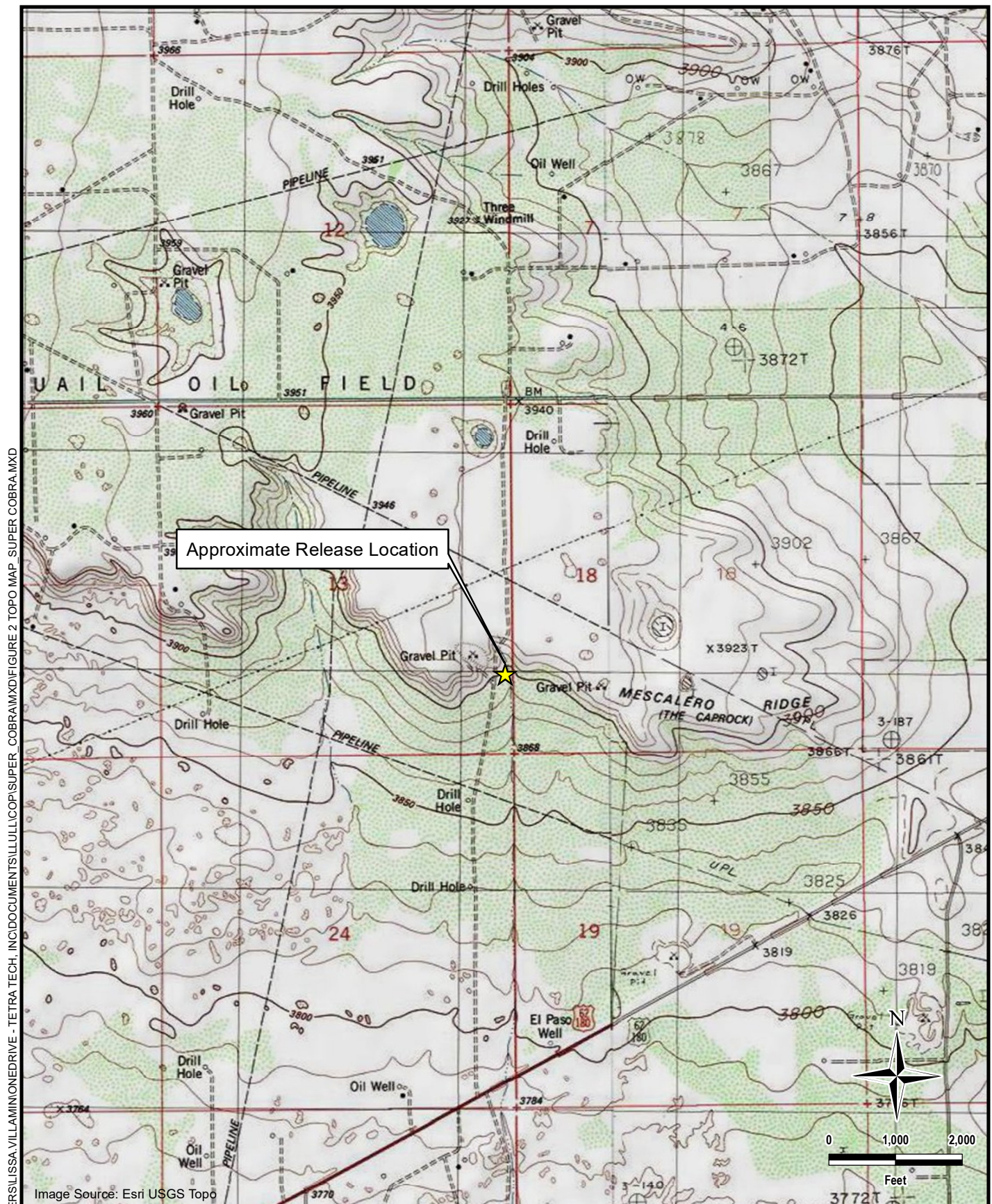
Figure 5 – Remediation Extents and Confirmation Sampling Locations

Attachment A – Photographic Documentation

Attachment B – Vegetation Survey (May 29, 2025)

FIGURES





TETRA TECH

www.tetrattech.com

901 West Wall Street, Suite 100
Midland, Texas 79701
Phone: (432) 682-4559
Fax: (432) 682-3946

CONOCOPHILLIPS

NAPP2310336759
(32.656428° - 103.505556°)
LEA COUNTY, NEW MEXICO

**SUPER COBRA ST COM 1H RELEASE
TOPOGRAPHIC MAP**

PROJECT NO.: 212C-MD-0392

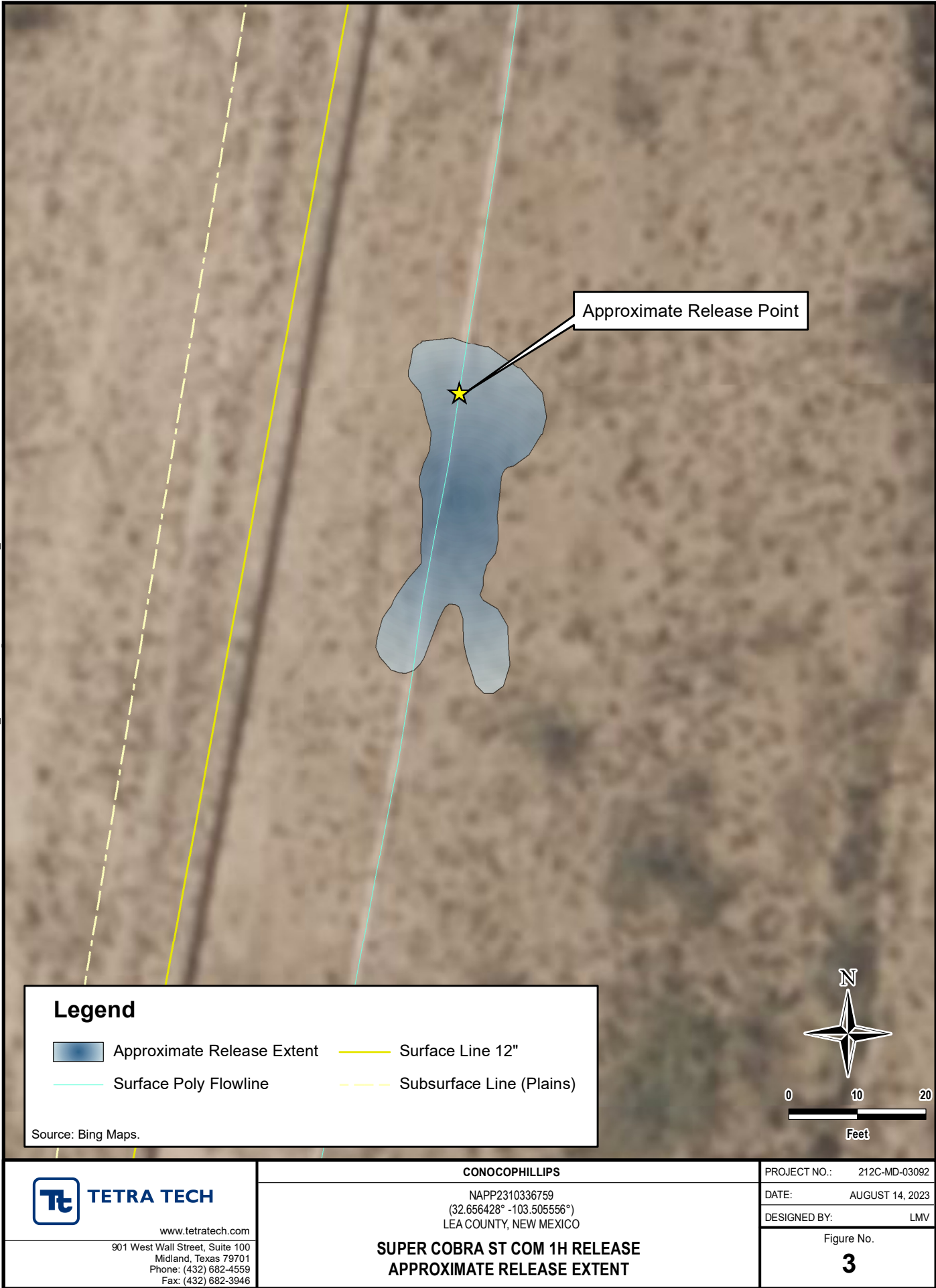
DATE: JUNE 12, 2023

DESIGNED BY: LMV

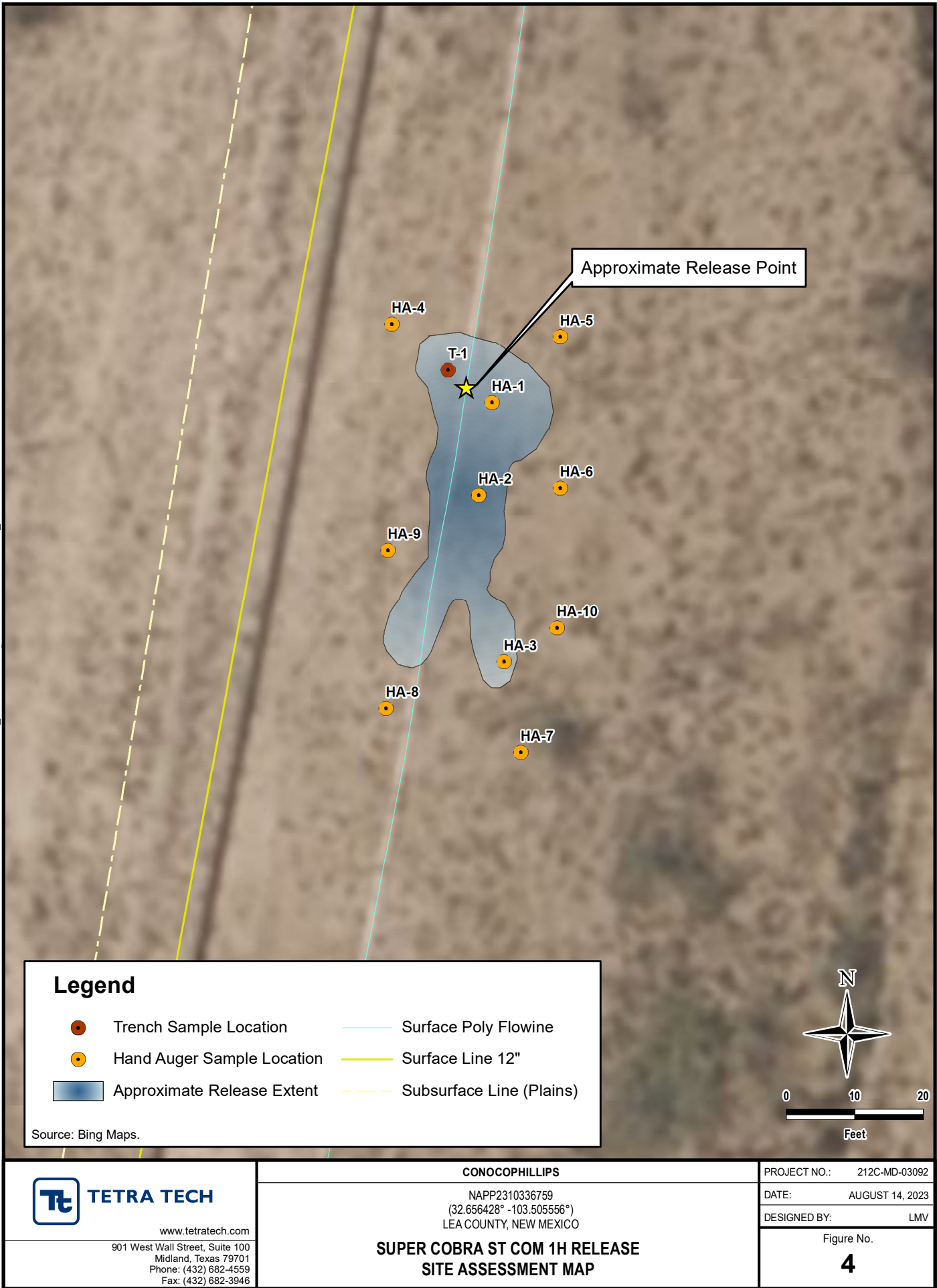
Figure No.

2

DOCUMENT PATH: C:\USERS\LISSA.VILLAMINIONEDRIVE - TETRA TECH, INC\DOCUMENTS\ILLU\COPI\SUPER_COBRAMXD\FIGURE 3 RELEASE_SUPER COBRA.MXD



DOCUMENT PATH: C:\USERS\LISSA.VILLAMONEDRIVE - TETRA TECH, INC\DOCUMENTS\ILLU\COPI\SUPER_COBRAMXD\FIGURE 4 SITE ASSESS - SUPER COBRA.MXD



DOCUMENT PATH: C:\USERS\ISSA.VILLAMONEDRIVE - TETRA TECH, INC\DOCUMENTS\ILLU\COPI\SUPER_COBRAMX\FIGURE 5 REMEDIATION AND CONFIRMATION SUPER COBRAMX.MXD



Legend

 Confirmation Floor Sample Location

 Confirmation Sidewall Sample Location

 Approximate Release Extent

 Excavated Area - 4' BGS

 Excavated Area - 6.5' BGS

 Surface Poly Flowline

 Surface Line 12"

 Subsurface Line (Plains)

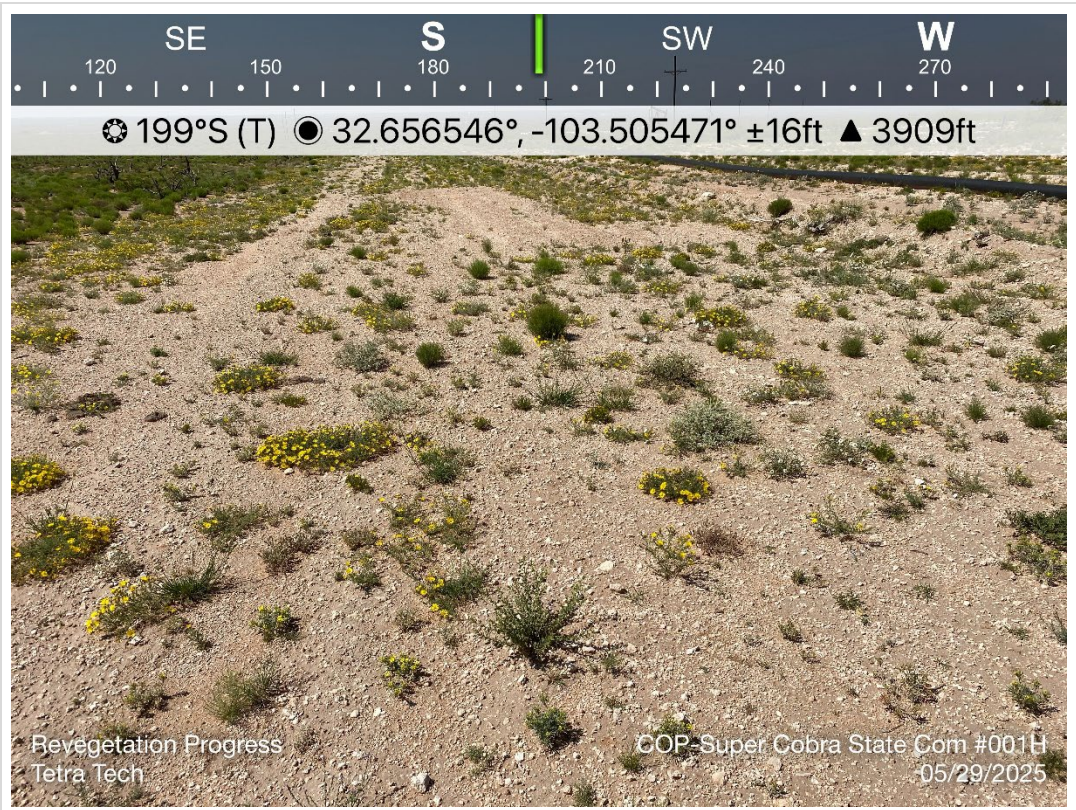
BGS: Below Ground Surface
Source: Bing Maps.



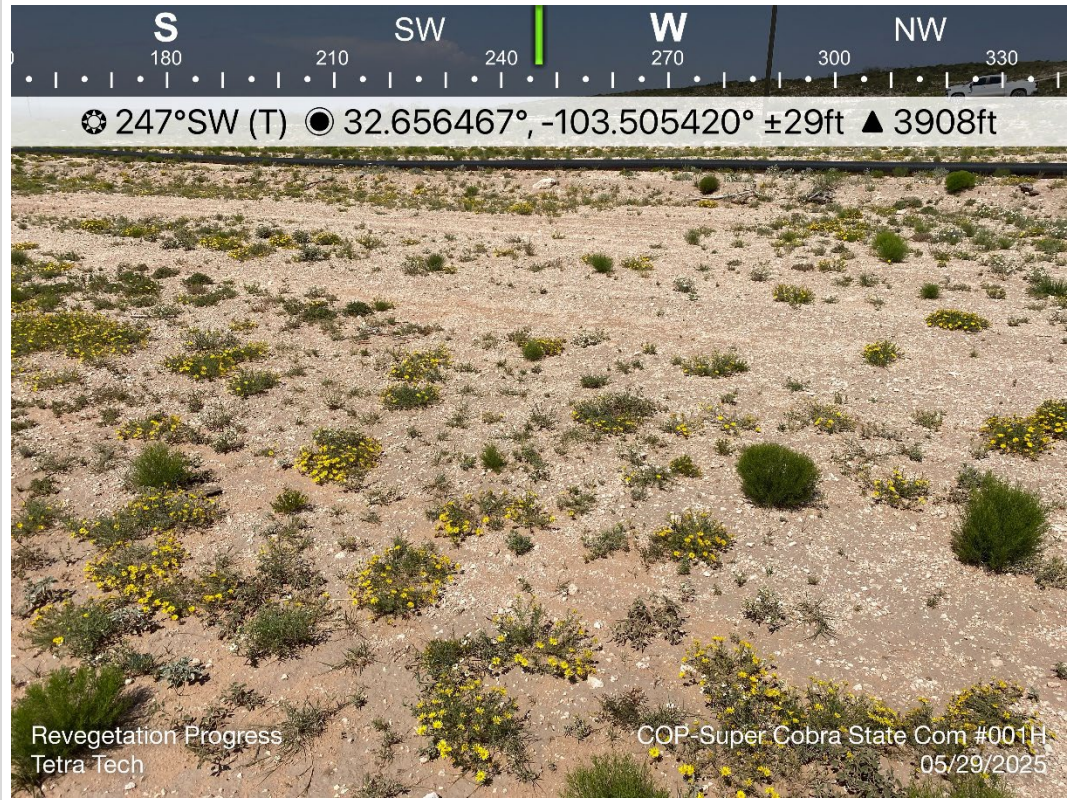
TETRA TECH www.tetrattech.com 901 West Wall Street, Suite 100 Midland, Texas 79701 Phone: (432) 682-4559 Fax: (432) 682-3946	CONOCOPHILLIPS		PROJECT NO.: 212C-MD-03092
	NAPP2310336759 (32.656428° -103.505556°) LEA COUNTY, NEW MEXICO		DATE: AUGUST 14, 2023
	SUPER COBRA ST COM 1H RELEASE REMEDATION EXTENTS AND CONFIRMATION SAMPLING LOCATIONS		DESIGNED BY: LMV
			Figure No. 5

ATTACHMENT A

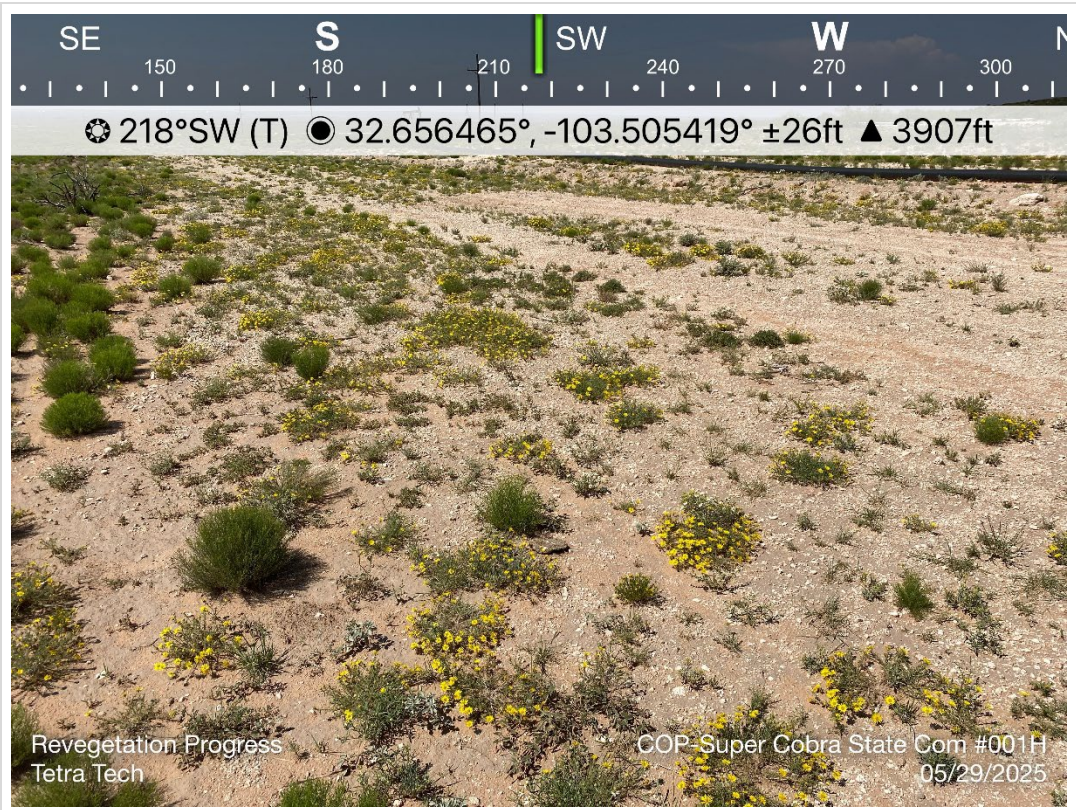
Photographic Documentation



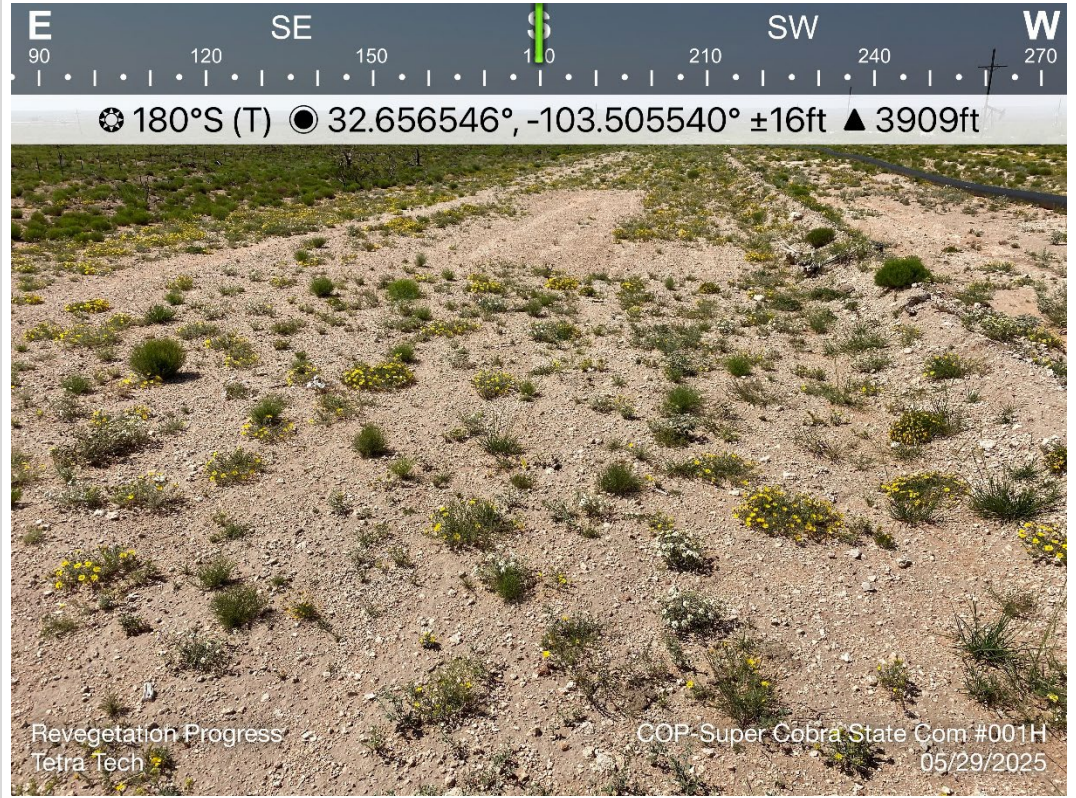
TETRA TECH, INC. PROJECT NO. 212C-MD-03092	DESCRIPTION	View south. Re-vegetation progress in remediated area.	1
	SITE NAME	Super Cobra State Com #001H Flowline Release	5/29/2025



TETRA TECH, INC. PROJECT NO. 212C-MD-03092	DESCRIPTION	View west-southwest. Re-vegetation progress in remediated area.	2
	SITE NAME	Super Cobra State Com #001H Flowline Release	5/29/2025



TETRA TECH, INC. PROJECT NO. 212C-MD-03092	DESCRIPTION	View southwest. Re-vegetation progress in remediated area.	3
	SITE NAME	Super Cobra State Com #001H Flowline Release	5/29/2025



TETRA TECH, INC. PROJECT NO. 212C-MD-03092	DESCRIPTION	View south. Re-vegetation progress in remediated area.	4
	SITE NAME	Super Cobra State Com #001H Flowline Release	5/29/2025

ATTACHMENT B Vegetation Survey

VEGETATION DATA FORM

Project: CoP- Super Cobra State Com 001 Revegetation	County: Lea County, NM
Date: 5/29/2025	Sample Point: V1A
GENERAL HABITAT TYPE: Mesquite Upland Scrub	

DOMINANT VEGETATION		
Tree Stratum (Plot Size: 30')	% Cover	Height (ft.)
1. N/A		
2.		
3.		
4.		
5.		
Total Cover	0%	
Shrub Stratum (Plot Size: 15')		
1. Gutierrezia sarothrae	5%	0.5 - 2.0'
2.		
3.		
4.		
5.		
6.		
7.		
Total Cover	26%	
Herb Stratum (Plot Size: 5')		
1. Psilactis brevilingulata	20%	0.25 - 1.0'
2. Chrysactinia mexicana	15%	0.25 - 1.0'
3. Setaria vulpiseta	5%	0.25 - 1.0'
4. Melampodium leucanthum	3%	0.25 - 1.0'
5.		
6.		
7.		
Total Cover	43%	
Woody Vine Stratum (Plot Size: 30')		
1. N/A		
2.		
Total Cover	0%	

Definitions of Habitat Type:

Creosote Bush, Mixed Desert, and Thorn Scrub – Creosote bush dominated scrubland with mixed shrub species; grasses are sparse.

Mesquite Upland Scrub – Mesquite dominated shrubland, often mixed with acacia species and juniper; grasses are sparse.

Sand Sagebrush Steppe – Sand sagebrush dominated shrubland (sagebrush and/or shinnery), often associated with dune systems; coverage can be sparse to moderately dense.

Mixed Desert Shrub Steppe – Dry, open grasslands with open to moderately dense shrub coverage.

Shortgrass Prairie – Shortgrass dominated grasslands that are extremely drought- and grazing-tolerant, often characterized by blue grama/buffalo grass.

Mixed Desert Riparian Woodland/Shrubland – Woodlands and shrublands that occur along low elevation rivers and streams, often in desert valleys. Frequently characterized by cottonwood, willow, alder and various rush, sedge and grass species.

Definitions of Vegetation Strata:

Tree – Woody plants, excluding woody vines, approximately 20 ft (6 m) or more in height and 3 in. (7.6 cm) or larger in diameter at breast height (DBH).

Shrub – Woody plants, excluding woody vines, approximately 3 to 20 ft (1 to 6 m) in height.

Herb – All herbaceous (non-woody) plants, including herbaceous vines, regardless of size. Include woody plants, except woody vines, less than approximately 3 ft. (1 m) in height.

Woody vine – All woody vines, regardless of height.

Notes:

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 503646

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 503646
	Action Type: [C-141] Revegetation Report C-141 (C-141-v-Revegetation)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2310336759
Incident Name	NAPP2310336759 SUPER COBRA STATE COM 001H @ FAPP2204042446
Incident Type	Produced Water Release
Incident Status	Re-vegetation Report Received
Incident Facility	[fAPP2204042446] SUPER COBRA ST COM 1H BATTERY

Location of Release Source

Please answer all the questions in this group.

Site Name	SUPER COBRA STATE COM 001H
Date Release Discovered	03/30/2023
Surface Owner	State

Incident Details

Please answer all the questions in this group.

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

Nature and Volume of Release

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

Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Corrosion Flow Line - Production Produced Water Released: 8 BBL Recovered: 1 BBL Lost: 7 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 503646

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 503646
	Action Type: [C-141] Revegetation Report C-141 (C-141-v-Revegetation)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	No
Reasons why this would be considered a submission for a notification of a major release	<i>Unavailable.</i>
<i>With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.</i>	

Initial Response

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

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

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

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

I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 09/08/2025
--	--

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

General Information
Phone: (505) 629-6116

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

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

QUESTIONS, Page 3

Action 503646

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:
	229137
	Action Number: 503646
Action Type: [C-141] Revegetation Report C-141 (C-141-v-Revegetation)	

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 51 and 75 (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 1 and 100 (ft.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Greater than 5 (mi.)
Any other fresh water well or spring	Greater than 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1 and 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	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)	20000
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	0
GRO+DRO (EPA SW-846 Method 8015M)	0
BTEX (EPA SW-846 Method 8021B or 8260B)	0
Benzene (EPA SW-846 Method 8021B or 8260B)	0

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	07/14/2023
On what date will (or did) the final sampling or liner inspection occur	07/14/2023
On what date will (or was) the remediation complete(d)	07/20/2023
What is the estimated surface area (in square feet) that will be reclaimed	1207
What is the estimated volume (in cubic yards) that will be reclaimed	132
What is the estimated surface area (in square feet) that will be remediated	1207
What is the estimated volume (in cubic yards) that will be remediated	132

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.

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 4

Action 503646

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 503646
	Action Type: [C-141] Revegetation Report C-141 (C-141-v-Revegetation)

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>	
(Ex Situ) Excavation and off-site disposal (i.e. dig and haul, hydrovac, etc.)	Yes
Which OCD approved facility will be used for off-site disposal	fAPP2204042446 SUPER COBRA ST COM 1H BATTERY
OR which OCD approved well (API) will be used for off-site disposal	Not answered.
OR is the off-site disposal site, to be used, out-of-state	No
OR is the off-site disposal site, to be used, an NMED facility	No
(Ex Situ) Excavation and on-site remediation (i.e. On-Site Land Farms)	No
(In Situ) Soil Vapor Extraction	No
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	No
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	No
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	No
Ground Water Abatement pursuant to 19.15.30 NMAC	No
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: 09/08/2025
<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>	

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 5

Action 503646

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 503646
	Action Type: [C-141] Revegetation Report C-141 (C-141-v-Revegetation)

QUESTIONS

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

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 6

Action 503646

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 503646
	Action Type: [C-141] Revegetation Report C-141 (C-141-v-Revegetation)

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	387301
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	07/01/2023
What was the (estimated) number of samples that were to be gathered	60
What was the sampling surface area in square feet	1207

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	1207
What was the total volume (cubic yards) remediated	132
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	1207
What was the total volume (in cubic yards) reclaimed	132
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: 09/08/2025
--	--

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

General Information
Phone: (505) 629-6116

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

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

QUESTIONS, Page 7

Action 503646

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 503646
	Action Type: [C-141] Revegetation Report C-141 (C-141-v-Revegetation)

QUESTIONS

Reclamation Report	
<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	1207
What was the total volume of replacement material (in cubic yards) for this site	132
<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 reseeded commence(d)	07/20/2023
Summarize any additional reclamation activities not included by answers (above)	NA
<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 reseeded 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: 09/08/2025

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

General Information
Phone: (505) 629-6116

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

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

QUESTIONS, Page 8

Action 503646

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 503646
	Action Type: [C-141] Revegetation Report C-141 (C-141-v-Revegetation)

QUESTIONS

Revegetation Report	
<i>Only answer the questions in this group if all surface restoration, reclamation and re-vegetation obligations have been satisfied.</i>	
Requesting a restoration complete approval with this submission	Yes
What was the total revegetation surface area (in square feet) for this site	1207
<i>Per Paragraph (2) of Subsection D of 19.15.29.13 NMAC the responsible party must reseed disturbed area in the first favorable growing season following closure of the site.</i>	
On what date did the reseeded commence	07/20/2023
On what date was the vegetative cover inspected	05/29/2025
What was the life form ratio compared to pre-disturbance levels	50
What was the total percent plant cover compared to pre-disturbance levels	70
Summarize any additional revegetation activities not included by answers (above)	Total percent plant cover at time of inspection was 69% based on the vegetation data form included in the report.
<i>The responsible party must attach information demonstrating they have complied with all applicable re-vegetation 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 life form ratio and percent plant cover sampling diagrams or other relevant field notes, photographs of re-vegetated areas, and a narrative of the re-vegetation 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: 09/08/2025
<i>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.</i>	

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

General Information
Phone: (505) 629-6116

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

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

CONDITIONS

Action 503646

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 503646
	Action Type: [C-141] Revegetation Report C-141 (C-141-v-Revegetation)

CONDITIONS

Created By	Condition	Condition Date
scott.rodgers	The revegetation report has been approved pursuant to 19.15.29.13 E. NMAC. The acceptance of this 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; or if the location fails to revegetate properly. In addition, the OCD approval does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.	10/17/2025