

L48 Spill Volume Estimate Form - Fill In Gray Cells

Received by OCD: 10/14/2025 1:48:59 PM

Facility Name & Well Number(s): Mercury State Com CTB				Release Discovery Date & Time: 5/21/25 7:00 AM			
Provide any known details about the event: MSO arrived on location around 7:00 AM. Noticed water leaking on 6" water trunk line on the bottom of a 6" T coming off of the 704 H FWKO. Isolated upstream and downstream of the leak. 6" butterfly valve is leaking by and was not able to stop the leak. MSO shut water tank inlet valve on 8" line. There was no point of connection to have a vacuum truck hook onto trunk line to suck out water from line. Remaining water in trunk line leaked out of pin hole. MSO was able to stop the leak.				Primary Cause (dropdown):	Asset Integrity - General Secondary Cause (dropdown): External Corrosion - Atmosphere		
Recovered Volume (bbl.) (if available, not included in volume calculations)				Method of Determination (dropdown)	Release Type (dropdown):	> 1/2" of Rain in Last 24 Hours (dropdown):	% Rainwater Recovered (not included in volume calculations, informational):
BU:	L48 Default	Asset Area:		Field Measurement	Produced Water	No	No
Known Volume (dropdown):				Yes	Release On/Off Pad	Known Volume of Spill (bbl.)	
Released to Imaging: 10/17/2025 3:43:43 PM				On-Pad		40	

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

Our Ref.: 12671620-NMOCD-1

October 14, 2025

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

Closure Report
ConocoPhillips Company
Mercury State Com CTB
Unit Letter N, Section 18, T26S, R28E
GPS: 32.03657, -104.12821
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 Mercury State Com CTB (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 nAPP2514239442.

2. Site Description and Release Summary

The Site is in Unit H, Section 13, Township 22 South, Range 27 East, in Eddy County, New Mexico (32.03657° N, 104.12821° W) and is associated with oil and gas exploration and production operations on land managed by the New Mexico State Land Office (SLO).

On May 21, 2025, a valve allowed release to lined secondary containment. Approximately 40 barrels (bbls) of produced water was released into the lined secondary containment due to corrosion. A vacuum truck was dispatched to the Site to recover free-standing fluids; all 40 bbls of released produced water was recovered from within the lined containment. The release was reported to the New Mexico Oil Conservation Division (NMOCD) on May 22, 2025, and was subsequently assigned Incident Number nAPP2514239442.

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 Ector stony loam, 0 to 9 percent slopes and Reeves-Gypsum land complex, 0 to 3 percent slopes. Per the New Mexico Bureau of Geology and Mineral Resources, the shallow geology is Salado Formation, Upper Permian in age. The Site is located within an area of high karst potential.

Groundwater was determined utilizing the New Mexico Office of the State Engineers (NMOSE) database for registered water wells, no known water sources is located with 0.50-mile radius of the Site. The nearest permitted groundwater well with depth to groundwater data is well USGS 320230104060601 located approximately 1.55 miles northeast of the Site. The well has a reported depth to groundwater of 16.35' below ground surface (ft bgs) on January 22, 1998. A copy of the referenced well 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 0.41 miles west of the site, and the nearest riverine wetland is 0.55 miles southwest with an associated Owl Draw. There are no permanent residences, schools, hospitals, institutions or churches within 300 feet of the Site. The closest residence is greater than 5 miles from the site. The nearest fresh water well utilized for livestock watering is located approximately 0.61 miles northwest of the Site. There are no subsurface mines or 100-year floodplains within 300 feet 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 high karst potential, the following NMOCD Table I Closure Criteria (Closure Criteria) apply:

Table 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 23, 2025. A liner integrity inspection was performed on September 26, 2025. The liner was visually inspected and no rips, tears, holes, or damages in the liner were 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 nAPP2514239442 be granted.

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

Regards,

GHD



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Senior Project Manager

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KT/lis/1



Jessica Wright
Project Director

+1 713 337-5419
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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

Attachment A

Referenced Well Records

National Water Information System: Web Interface

USGS Water Resources

Data Category:
Groundwater

Geographic Area:
New Mexico

GO

Click to hideNews Bulletins

- Explore the NEW [USGS National Water Dashboard](#) interactive map to access real-time water data from over 13,500 stations nationwide.

Groundwater levels for New Mexico

Click to hide state-specific text

 Important: [Next Generation Monitoring Location Page](#)

Search Results -- 1 sites found

Agency code = usgs

site_no list =

- 320230104060601

Minimum number of levels = 1
[Save file of selected sites](#) to local disk for future upload

USGS 320230104060601 26S.28E.18.33111

Eddy County, New Mexico
Latitude 32°02'30", Longitude 104°06'06" NAD27
Land-surface elevation 3,070 feet above NAVD88
This well is completed in the Other aquifers (N9999OTHER) national aquifer.
This well is completed in the Castile Formation (312CSTL) local aquifer.

Output formats

Table of data
Tab-separated data
Graph of data
Reselect period

Date	Time	? Water-level date- time accuracy	? Parameter code	Water level, feet below land surface	Water level, feet above specific vertical datum	Referenced vertical datum	? Status	? Method of measurement	? Measuring agency	? Source (measur
1981-05-01			D	62610	3050.88	NGVD29	1		Z	
1981-05-01			D	62611	3052.48	NAVD88	1		Z	
1981-05-01			D	72019	17.52		1		Z	
1983-01-25			D	62610	3052.15	NGVD29	1		Z	
1983-01-25			D	62611	3053.75	NAVD88	1		Z	
1983-01-25			D	72019	16.25		1		Z	
1987-10-13			D	62610	3053.27	NGVD29	1		Z	
1987-10-13			D	62611	3054.87	NAVD88	1		Z	
1987-10-13			D	72019	15.13		1		Z	
1992-11-03			D	62610	3050.77	NGVD29	1		S	
1992-11-03			D	62611	3052.37	NAVD88	1		S	
1992-11-03			D	72019	17.63		1		S	
1998-01-22			D	62610	3052.05	NGVD29	1		S	
1998-01-22			D	62611	3053.65	NAVD88	1		S	
1998-01-22			D	72019	16.35		1		S	

Explanation		
Section	Code	Description
Water-level date-time accuracy	D	Date is accurate to the Day
Parameter code	62610	Groundwater level above NGVD 1929, feet
Parameter code	62611	Groundwater level above NAVD 1988, feet
Parameter code	72019	Depth to water level, feet below land surface
Referenced vertical datum	NAVD88	North American Vertical Datum of 1988
Referenced vertical datum	NGVD29	National Geodetic Vertical Datum of 1929
Status	1	Static
Method of measurement	S	Steel-tape measurement.
Method of measurement	Z	Other.
Measuring agency		Not determined
Source of measurement		Not determined
Water-level approval status	A	Approved for publication -- Processing and review completed.

[Questions or Comments](#)

[Help](#)

[Data Tips](#)

[Explanation of terms](#)

[Subscribe for system changes](#)

[Accessibility](#) [FOIA](#) [Privacy](#) [Policies and Notices](#)
[U.S. Department of the Interior](#) | [U.S. Geological Survey](#)
Title: Groundwater for New Mexico: Water Levels
URL: <https://nwis.waterdata.usgs.gov/nm/nwis/gwlevels?>



Page Contact Information: [New Mexico Water Data Maintainer](#)
Page Last Modified: 2025-04-30 16:11:31 EDT
0.36 0.28 nadww02

Attachment B

Site Characterization Documentation



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.

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
EC	Ector stony loam, 0 to 9 percent slopes	3.7	87.9%
RG	Reeves-Gypsum land complex, 0 to 3 percent slopes	0.5	12.1%
Totals for Area of Interest		4.2	100.0%

Eddy Area, New Mexico

EC—Ector stony loam, 0 to 9 percent slopes

Map Unit Setting

National map unit symbol: 1w4b

Elevation: 3,300 to 4,800 feet

Mean annual precipitation: 10 to 18 inches

Mean annual air temperature: 58 to 62 degrees F

Frost-free period: 195 to 210 days

Farmland classification: Not prime farmland

Map Unit Composition

Ector and similar soils: 100 percent

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

Description of Ector

Setting

Landform: Hills, ridges

Landform position (two-dimensional): Shoulder, backslope, footslope, toeslope

Landform position (three-dimensional): Head slope, nose slope, side slope, crest

Down-slope shape: Convex

Across-slope shape: Linear

Parent material: Residuum weathered from limestone

Typical profile

H1 - 0 to 6 inches: very cobbly loam

H2 - 6 to 60 inches: bedrock

Properties and qualities

Slope: 0 to 9 percent

Depth to restrictive feature: 4 to 20 inches to lithic bedrock

Drainage class: Well drained

Runoff class: Medium

Capacity of the most limiting layer to transmit water

(Ksat): Moderately low to high (0.06 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: 60 percent

Maximum salinity: Nonsaline to slightly saline (0.0 to 4.0 mmhos/cm)

Sodium adsorption ratio, maximum: 1.0

Available water supply, 0 to 60 inches: Very low (about 0.5 inches)

Interpretive groups

Land capability classification (irrigated): None specified

Land capability classification (nonirrigated): 7s

Map Unit Description: Ector stony loam, 0 to 9 percent slopes---Eddy Area, New Mexico

Soil Description1

Hydrologic Soil Group: D
Ecological site: R042CY158NM - Very Shallow
Hydric soil rating: No

Data Source Information

Soil Survey Area: Eddy Area, New Mexico
Survey Area Data: Version 20, Sep 3, 2024

Map Unit Description: Reeves-Gypsum land complex, 0 to 3 percent slopes---Eddy Area, New Mexico

Soil Description2

Eddy Area, New Mexico

RG—Reeves-Gypsum land complex, 0 to 3 percent slopes

Map Unit Setting

National map unit symbol: 1w5f

Elevation: 1,250 to 5,000 feet

Mean annual precipitation: 10 to 25 inches

Mean annual air temperature: 57 to 70 degrees F

Frost-free period: 190 to 235 days

Farmland classification: Not prime farmland

Map Unit Composition

Reeves and similar soils: 55 percent

Gypsum land: 30 percent

Minor components: 15 percent

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

Description of Reeves

Setting

Landform: Ridges, plains, hills

Landform position (two-dimensional): Shoulder, backslope, footslope, toeslope

Landform position (three-dimensional): Side slope, head slope, nose slope, crest

Down-slope shape: Convex

Across-slope shape: Linear

Parent material: Residuum weathered from gypsum

Typical profile

H1 - 0 to 8 inches: loam

H2 - 8 to 32 inches: clay loam

H3 - 32 to 60 inches: gypsiferous material

Properties and qualities

Slope: 0 to 1 percent

Depth to restrictive feature: More than 80 inches

Drainage class: Well drained

Runoff class: High

Capacity of the most limiting layer to transmit water (Ksat): Very low to moderately low (0.00 to 0.06 in/hr)

Depth to water table: More than 80 inches

Frequency of flooding: None

Frequency of ponding: None

Calcium carbonate, maximum content: 25 percent

Gypsum, maximum content: 80 percent

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

Sodium adsorption ratio, maximum: 4.0

Available water supply, 0 to 60 inches: Low (about 4.3 inches)



Map Unit Description: Reeves-Gypsum land complex, 0 to 3 percent slopes---Eddy Area, New Mexico

Soil Description2

Interpretive groups

Land capability classification (irrigated): 3s

Land capability classification (nonirrigated): 7s

Hydrologic Soil Group: B

Ecological site: R070BC007NM - Loamy

Hydric soil rating: No

Description of Gypsum Land

Setting

Landform: Ridges, plains, hills

Landform position (two-dimensional): Shoulder, backslope, footslope, toeslope

Landform position (three-dimensional): Side slope, head slope, nose slope, crest

Down-slope shape: Convex

Across-slope shape: Linear

Parent material: Residuum weathered from gypsum

Interpretive groups

Land capability classification (irrigated): None specified

Land capability classification (nonirrigated): 8s

Hydric soil rating: No

Minor Components

Largo

Percent of map unit: 5 percent

Ecological site: R070BC007NM - Loamy

Hydric soil rating: No

Reagan

Percent of map unit: 5 percent

Ecological site: R070BC007NM - Loamy

Hydric soil rating: No

Cottonwood

Percent of map unit: 5 percent

Ecological site: R070BC033NM - Salty Bottomland

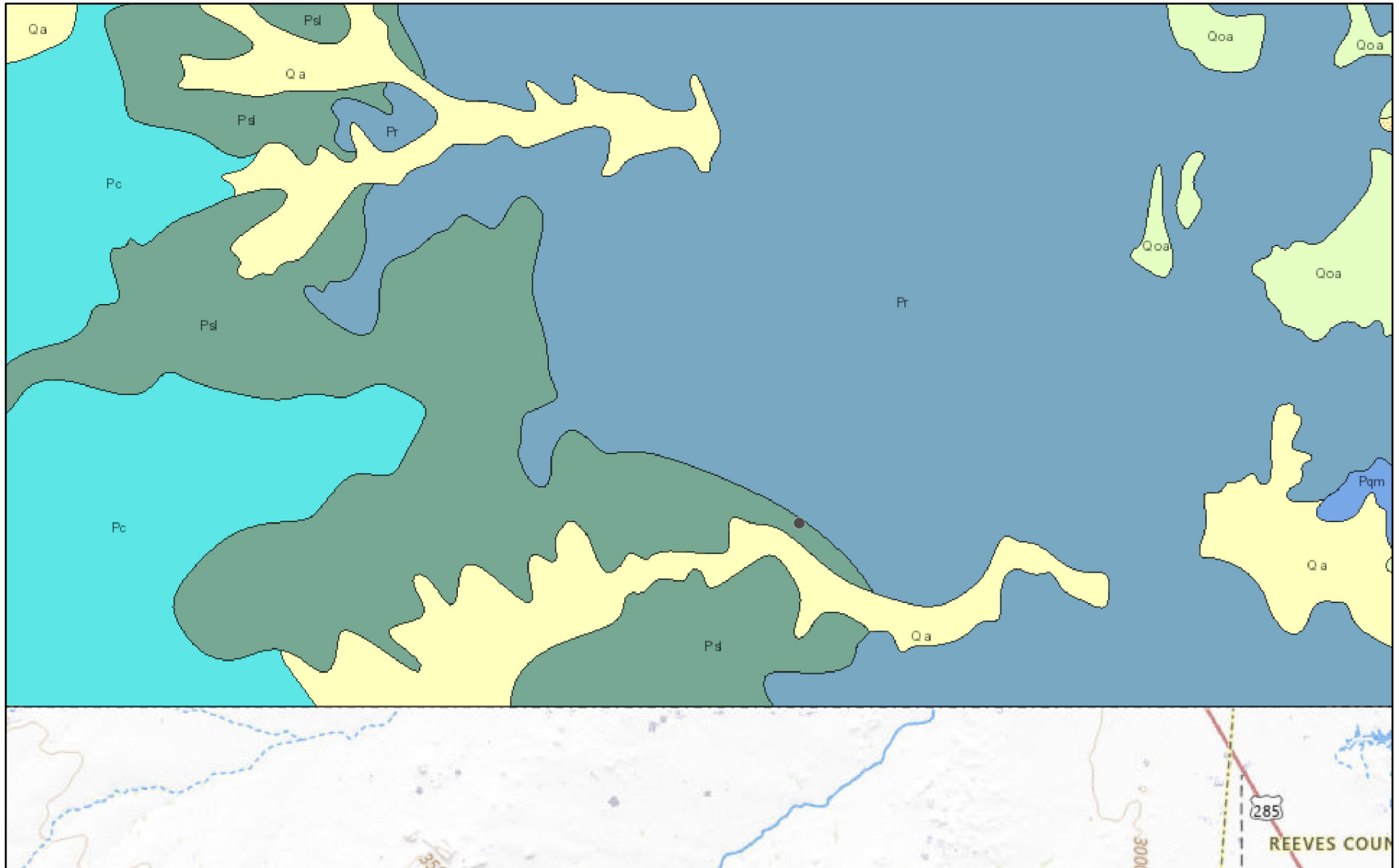
Hydric soil rating: No

Data Source Information

Soil Survey Area: Eddy Area, New Mexico

Survey Area Data: Version 20, Sep 3, 2024

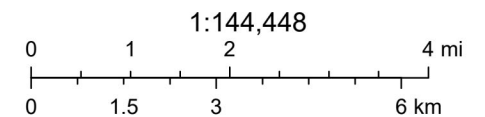
Mercury State Com CTB



6/6/2025, 9:31:35 AM

Lithologic Units

- Playa—Alluvium and evaporite deposits (Holocene)
- Water—Perennial standing water
- Qa—Alluvium (Holocene to upper Pleistocene)



Esri, NASA, NGA, USGS, USGS The National Map: National Boundaries Dataset, 3DEP Elevation Program, Geographic Names Information System,

ArcGIS Web AppBuilder

USGS The National Map: National Boundaries Dataset, 3DEP Elevation Program, Geographic Names Information System, National Hydrography Dataset, National Land Cover Database, National Structures Dataset, and National Transportation Dataset; USGS Global

Kart Potential



9/29/2025, 3:28:10 PM

Karst Occurrence Potential

Medium
High

1:18,056

0	0.13	0.25	0.5 mi
0	0.2	0.4	0.8 km

BLM, OCD, New Mexico Tech, Maxar

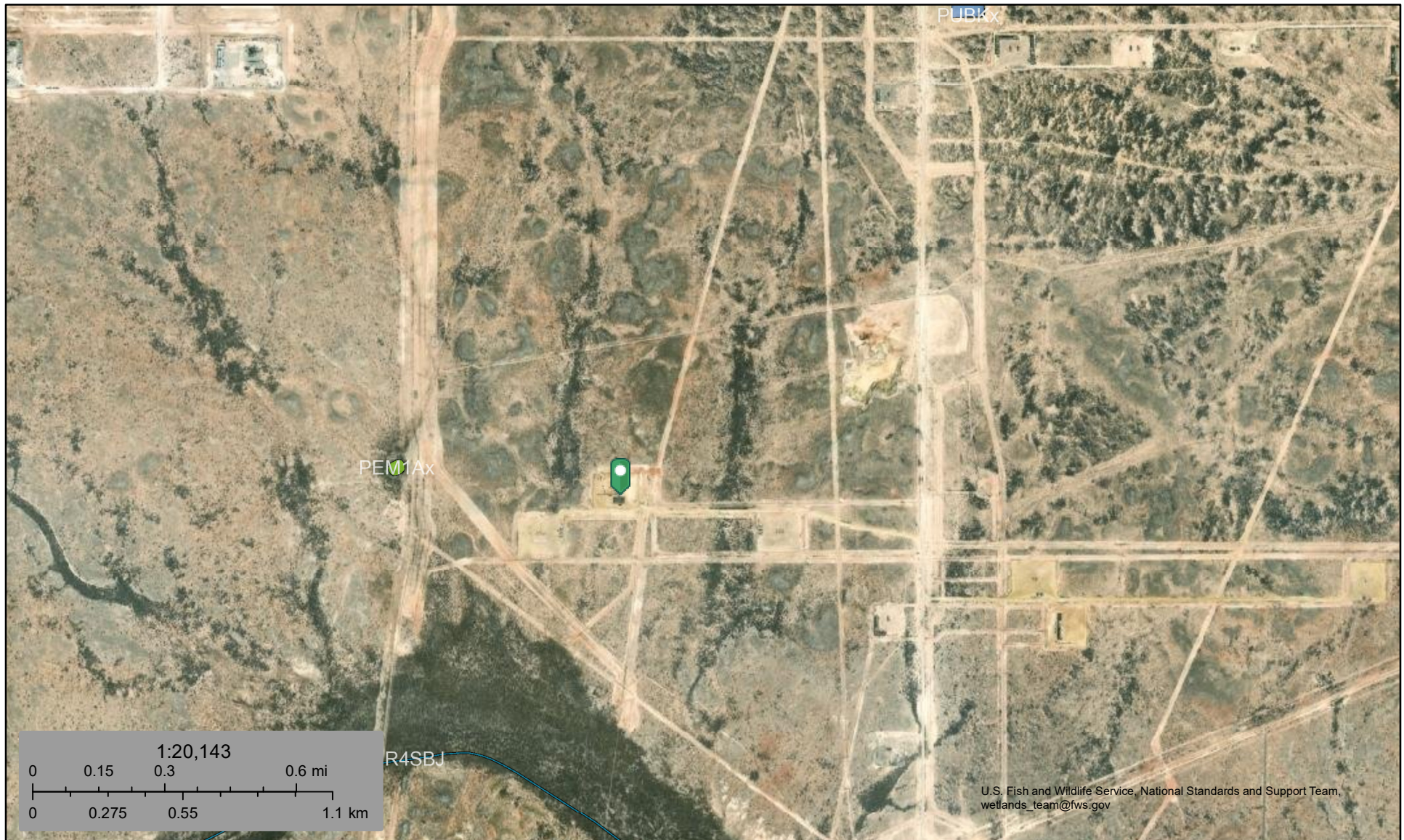
New Mexico Oil Conservation Division
NM OCD Oil and Gas Map. <http://nm-emnrd.maps.arcgis.com/apps/webappviewer/index.html?id=4d017f2306164de29fd2fb9f8f35ca75> New Mexico Oil Conservation Division



U.S. Fish and Wildlife Service

National Wetlands Inventory

Wetlands



September 29, 2025

Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

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

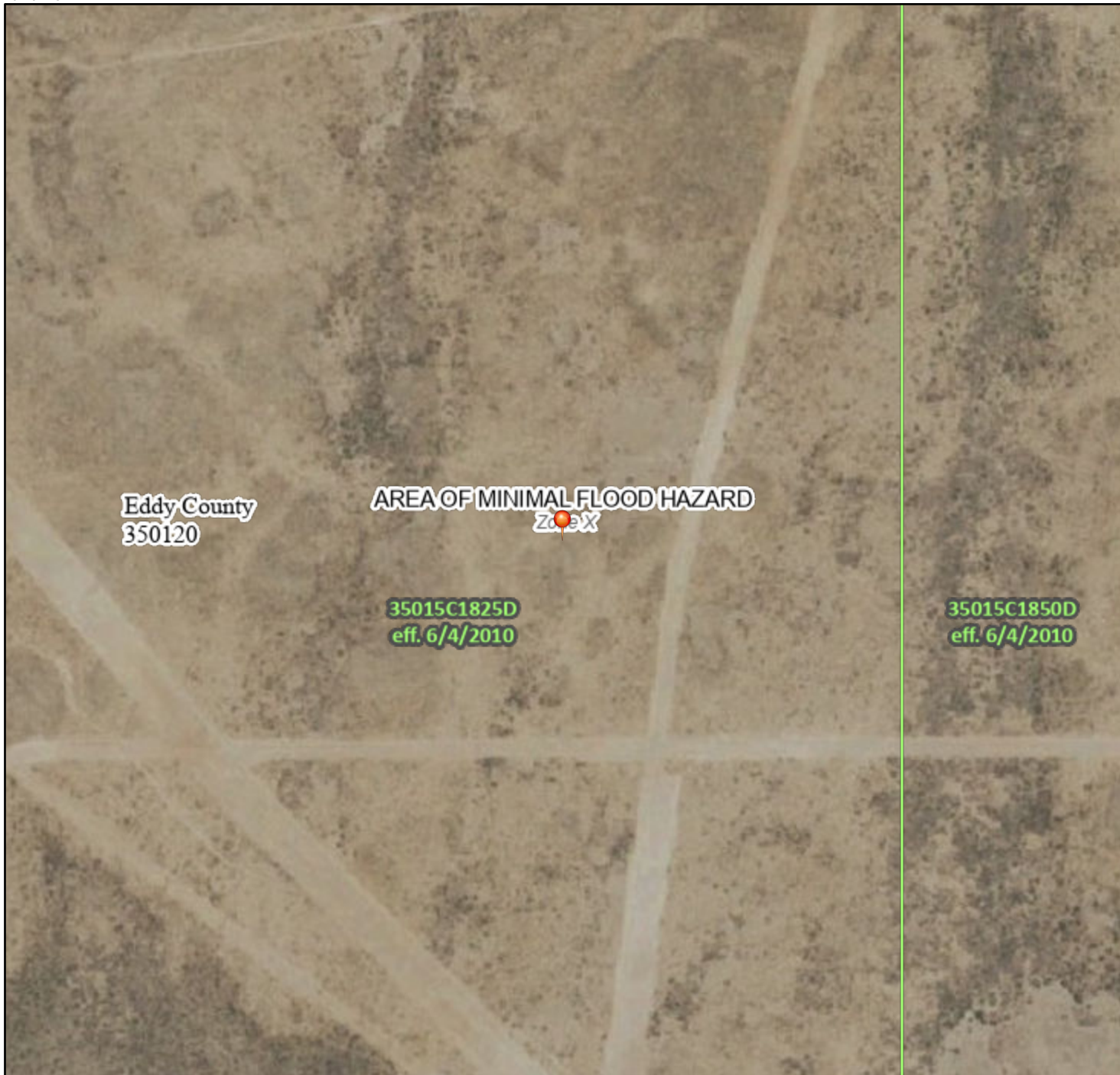
- Lake
- Other
- Riverine

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°8'W 32°2'27"N



0 250 500 1,000 1,500 2,000 Feet

1:6,000

104°7'23"W 32°1'57"N

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
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect 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 9/29/2025 at 9:13 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
Mercury State Com CTB
Incident No. nAPP25115728074
Eddy County, New Mexico



Photo 1 View of Site signage.



Photo 2 View of containment facing south.



Photo 3 View of containment facing south.



Photo 4 View of containment facing west.

ConocoPhillips Company
 Mercury State Com CTB
 Incident No. nAPP25115728074
 Eddy County, New Mexico



Photo 5 View of central portion of containment facing south.



Photo 6 View of central portion of containment facing south.



Photo 7 View of containment facing west.



Photo 8 View of containment facing south.

ConocoPhillips Company
Mercury State Com CTB
Incident No. nAPP25115728074
Eddy County, New Mexico



Photo 9 View of central portion of containment facing east.



Photo 10 View of containment facing east.



Photo 11 View of central portion of containment facing south.



Photo 12 View of central 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 515129

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 515129
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2514239442
Incident Name	NAPP2514239442 MERCURY STATE COM CTB @ FAPP2203555433
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Facility	[fAPP2203555433] MERCURY ST COM CTB

Location of Release Source

Please answer all the questions in this group.

Site Name	MERCURY STATE COM CTB
Date Release Discovered	05/21/2025
Surface Owner	State

Incident Details

Please answer all the questions in this group.

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

Nature and Volume of Release

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

Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Other Valve Produced Water Released: 40 BBL Recovered: 40 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 515129

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 515129
	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: 10/14/2025
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Sante Fe Main Office
Phone: (505) 476-3441

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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 515129

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 515129
	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)	Less than or equal 25 (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 500 and 1000 (ft.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 500 and 1000 (ft.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 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 500 and 1000 (ft.)
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	High
A 100-year floodplain	Between 500 and 1000 (ft.)
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	09/26/2025
On what date will (or did) the final sampling or liner inspection occur	09/25/2025
On what date will (or was) the remediation complete(d)	09/26/2025
What is the estimated surface area (in square feet) that will be remediated	7000
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 515129

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 515129
	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)	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: 10/14/2025
<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 515129

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 515129
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	508254
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	09/26/2025
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	7000

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	7000
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	Liner inspected
<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: 10/14/2025

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CONDITIONS

Action 515129

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 515129
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
scott.rodgers	App ID 515129 Liner Inspection approved	10/17/2025