

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

Our Ref.: 12682859-NMOCD-1

December 16, 2025

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

Closure Report
COG Operating, LLC
Howitzer 12 Fed Com CTB
Unit Letter A, Section 12, T24S, R28E
GPS: 32.23679, -104.034304
Eddy County, New Mexico

1. Introduction

GHD Services Inc. (GHD), on behalf of COG Operating, LLC (COG), has prepared this *Closure Report* to document site assessment activities at Howitzer Federal 12 Fed 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, COG is submitting this *Closure Report*, describing Site assessment activities that have occurred and requesting closure for Incident Number nAPP2528130624.

2. Site Description and Release Summary

The Site is in Unit A, Section 12, Township 24 South, Range 28 East, in Eddy County, New Mexico (32.23679° N, 104.034304° W) and is associated with oil and gas exploration and production operations on New Mexico State Land Office (SLO).

On September 16, 2025, approximately seven (7) barrels (bbls) of produced water were released into the lined secondary containment due to corrosion. A vacuum truck was dispatched to the Site to recover free-standing fluids; four (4) bbls of produced water were recovered from within the lined containment and three (3) bbls remained as residual within the containment and on equipment. The release was reported to the New Mexico Oil Conservation Division (NMOCD) on October 8, 2025, and was subsequently assigned Incident Number nAPP2528130624.

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 Anthony sandy loam, 0 to 1 percent slopes, Atoka loam, 1 to 3 percent slopes, and Upton soils, 0 to 1 percent slopes. The Site is located within an area of medium karst potential.

Depth to groundwater at the Site is estimated to be 60 feet below ground surface (ft bgs) based on the nearest groundwater well data. Groundwater was determined utilizing the New Mexico Office of the State Engineers (NMOSE) database for registered water wells. The nearest permitted groundwater well with depth to groundwater data is C-2184 located approximately 0.57 miles northwest of the Site. The well was completed to a depth of 85 ft bgs on December 12, 1989, and static groundwater reported at 60 ft bgs. A copy of the referenced well record is included in **Attachment 1**.

The Site is not within 300 ft of any continuously flowing watercourse or any other significant watercourse. There are no lakebeds, sinkholes or playa lakes within 200 ft of the Site. The closest playa is approximately 0.16 miles east of the Site, and the nearest riverine wetland is 0.12 miles east. There are no permanent residences, schools, hospitals, institutions or churches within 300 ft of the Site. The closest residence is approximately 0.76 miles southwest from the Site. The nearest fresh water well utilized for livestock watering is located approximately 0.93 miles northwest of the Site. There are no subsurface mines or 100-year floodplains within 300 ft of the Site. The location of the Site is depicted on **Figure 1**. A detailed map of the Site is provided in **Figure 2**. The Site Characterization Documentation is included in **Attachment 2**.

Based on the results of the Site Characterization desktop review, the following NMOCD Table I Closure Criteria (Closure Criteria) apply due to the medium karst potential and not having verified groundwater depth within 0.50 miles of the Site:

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	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 November 5, 2025. A liner integrity inspection was performed on November 7, 2025. The liner was visually inspected and no rips, tears, holes, or damage 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 3**.

5. Closure Request

Based on the liner inspection and assessment activities at the Site, COG respectfully requests that no further actions be required, and requests closure for Incident Number nAPP2528130624 be granted.

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

Regards,

GHD



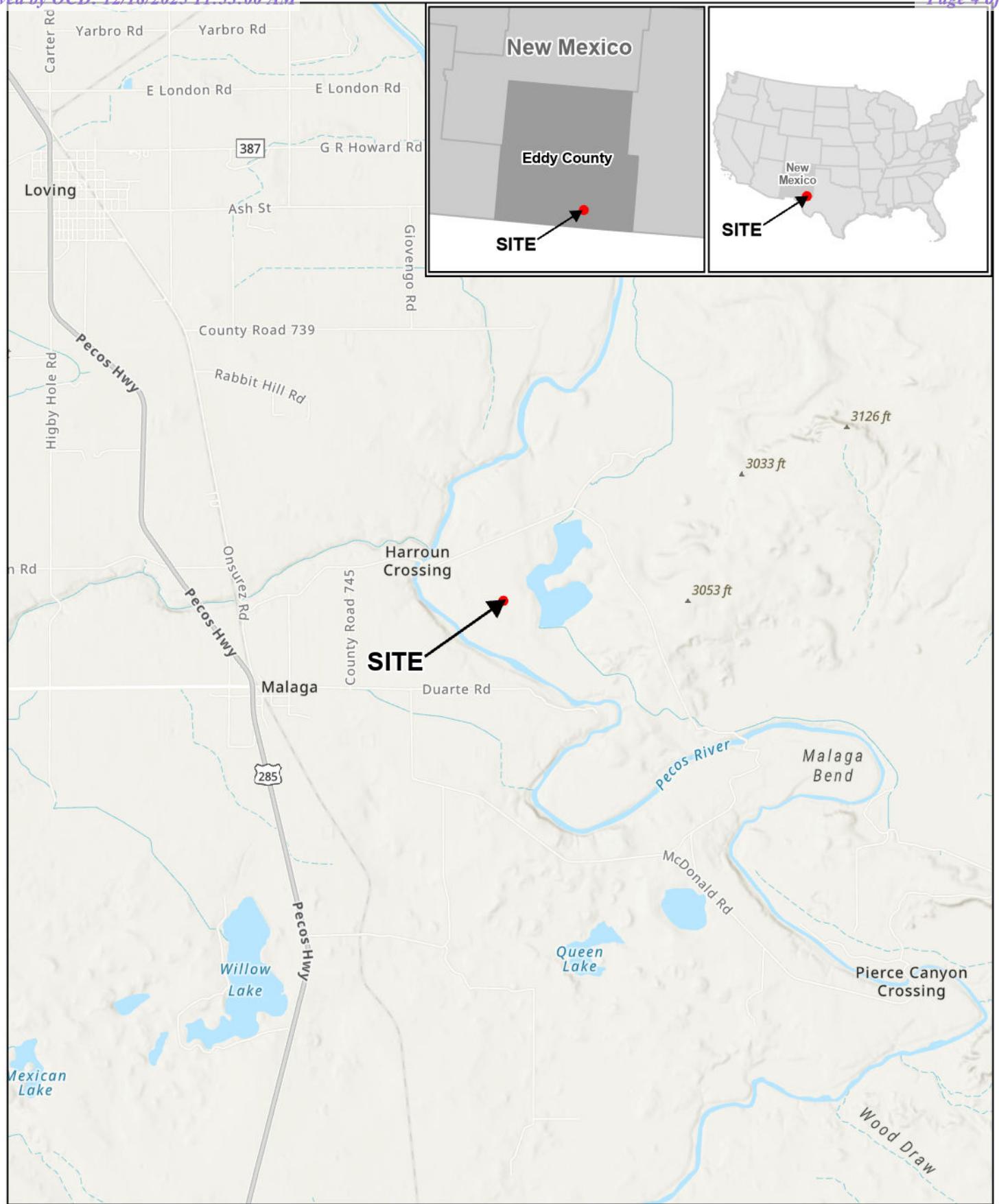
Kayla Taylor
Senior Project Manager
(432) 210-5443
kayla.taylor@GHD.com



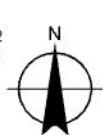
Scott Foord
Project Director
(281) 725-7477
william.foord@GHD.com

KT/kdn/1

Encl.: Figure 1 - Site Location Map
Figure 2 - Site Details Map
Attachment 1 - Referenced Well Records
Attachment 2 - Site Characterization Documentation
Attachment 3 - Photographic Documentation



Paper Size ANSI A
 0 0.5 1 1.5 2
 Miles



Map Projection: Transverse Mercator
 Horizontal Datum: NAD 1983 2011
 Grid: NAD 1983 2011 StatePlane New Mexico East FIPS 3001 Ft US



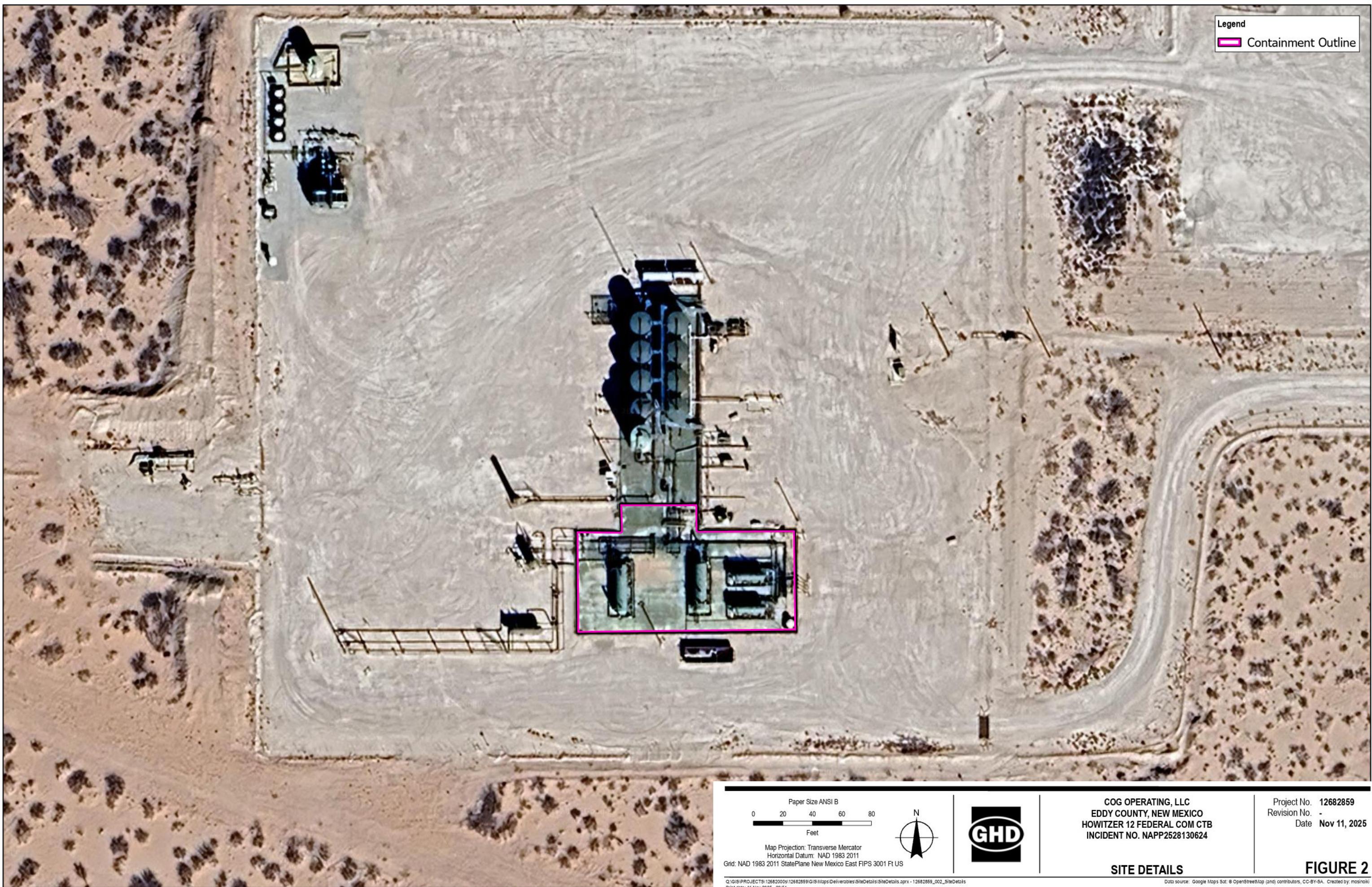
COG OPERATING, LLC
 EDDY COUNTY, NEW MEXICO
 HOWITZER 12 FEDERAL COM CTB
 INCIDENT NO. NAPP2528130624

Project No. 12682859
 Revision No. -
 Date Nov 11, 2025

SITE LOCATION MAP

Data source: World Topographic Map. Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, & OpenStreetMap contributors, and the GIS User Community. World Hillshade: Esri, NASA, NGA, USGS, FEMA. Created by: mosinoki

FIGURE 1



Attachments

Attachment 1

Referenced Well Records

Revised June 1972

STATE ENGINEER OFFICE
WELL RECORD

469011

Section 1. GENERAL INFORMATION

(A) Owner of well Santa Fe Energy Owner's Well No. 0 JAN 10 A/0.04
 Street or Post Office Address 500 W. Illinois
 City and State Midland, TX 79701

SANTA FE, NEW MEXICO

Well was drilled under Permit No. C-2184 and is located in the:
 NW a. NE 1/4 NE 1/4 SE 1/4 SW 1/4 of Section 1 Township 24S Range 28E N.M.P.M.

b. Tract No. _____ of Map No. _____ of the _____

c. Lot No. _____ of Block No. _____ of the _____
 Subdivision, recorded in Eddy County.

d. X= _____ feet, Y= _____ feet, N.M. Coordinate System _____
 the _____ Zone in _____ Grant.

(B) Drilling Contractor Hickerson Drilling & Pump License No. WD 1184

Address 3806 W. University Odessa, TX 79764

Drilling Began 12-10-89 Completed 12-10-89 Type tools Air rotary Size of hole 8 3/4 in.

Elevation of land surface or _____ at well is _____ ft. Total depth of well 87 ft.

Completed well is shallow artesian. Depth to water upon completion of well 60 ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
From	To			
60	85	25	Coarse sand & gravel	300

Section 3. RECORD OF CASING

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)			Perforations	
From	To						From	To
6	160		2' above grade	87	89		47	87

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet		Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement
From	To				
Surface	15'	8 3/4		10 Sacks	Poured slurry

Section 5. PLUGGING RECORD

Plugging Contractor _____

Address _____

Plugging Method _____

Date Well Plugged _____

Plugging approved by: _____

State Engineer Representative _____

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
1			
2			
3			
4			

FOR USE OF STATE ENGINEER ONLY

Date Received December 19, 1989

Quad _____ FWL _____ FSL _____

File No. C-2184

Use OWD

Location No. 24.28.1.34221

Section 6. LOG OF HOLE

Section 7. REMARKS AND ADDITIONAL INFORMATION

STATE ENGINEER OFFICE
ROSWELL, NEW MEXICO

The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described hole.

Robert E. Collier
Driller

Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All sections, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 5 need be completed.

JAN 23 '91 08:40 U.T.C. P. NELL (SER. 915-381-7853)

P. E. 2
Revised June 1972

STATE ENGINEER OFFICE

WELL RECORD

Section 1. GENERAL INFORMATION

(A) Owner of well Santa Fe Energy Resources Owner's Well No. C 2184
 Street or Post Office Address 550 W. Texas Suite 1330
 City and State Midland, TX 79701

Well was drilled under Permit No. _____ and is located in the:

a. SE ¼ ¼ ¼ ¼ of Section 1 Township 24S Range 28E N.M.P.M.
 b. Tract No. _____ of Map No. _____ of the _____
 c. Lot No. _____ of Block No. _____ of the _____
 Subdivision, recorded in Fddy County.
 d. X= _____ feet, Y= _____ feet, N.M. Coordinate System _____ Zone in
 the _____ Grant.

(B) Drilling Contractor West Texas Water Well Service License No. WD 1184

Address 3432 W. University Odessa, TX 79764

Drilling Began _____ Completed _____ Type tools _____ Size of hole _____ in.

Elevation of land surface or _____ at well is _____ ft. Total depth of well 87 ft.

Completed well is shallow artesian. Depth to water upon completion of well _____ ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
From	To			

Section 3. RECORD OF CASING

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)			Perforations	
From	To						From	To

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet		Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement	
From	To				From	To

Section 5. PLUGGING RECORD

Plugging Contractor West Texas Water Well Service

Address 3432 W. University Odessa, TX

Plugging Method Poured slurry

Date Well Plugged 1-18-91

Plugging approved by: John Lubra

State Engineer Representative

No.		Depth in Feet	
Top	Bottom		
1	0	87	24
2			
3			
4			

FOR USE OF STATE ENGINEER ONLY

Date Received February 8, 1991

Quad _____ FWL _____ FSL _____

File No. C-2184

Use OWD

Location No. 24.28.01.34221

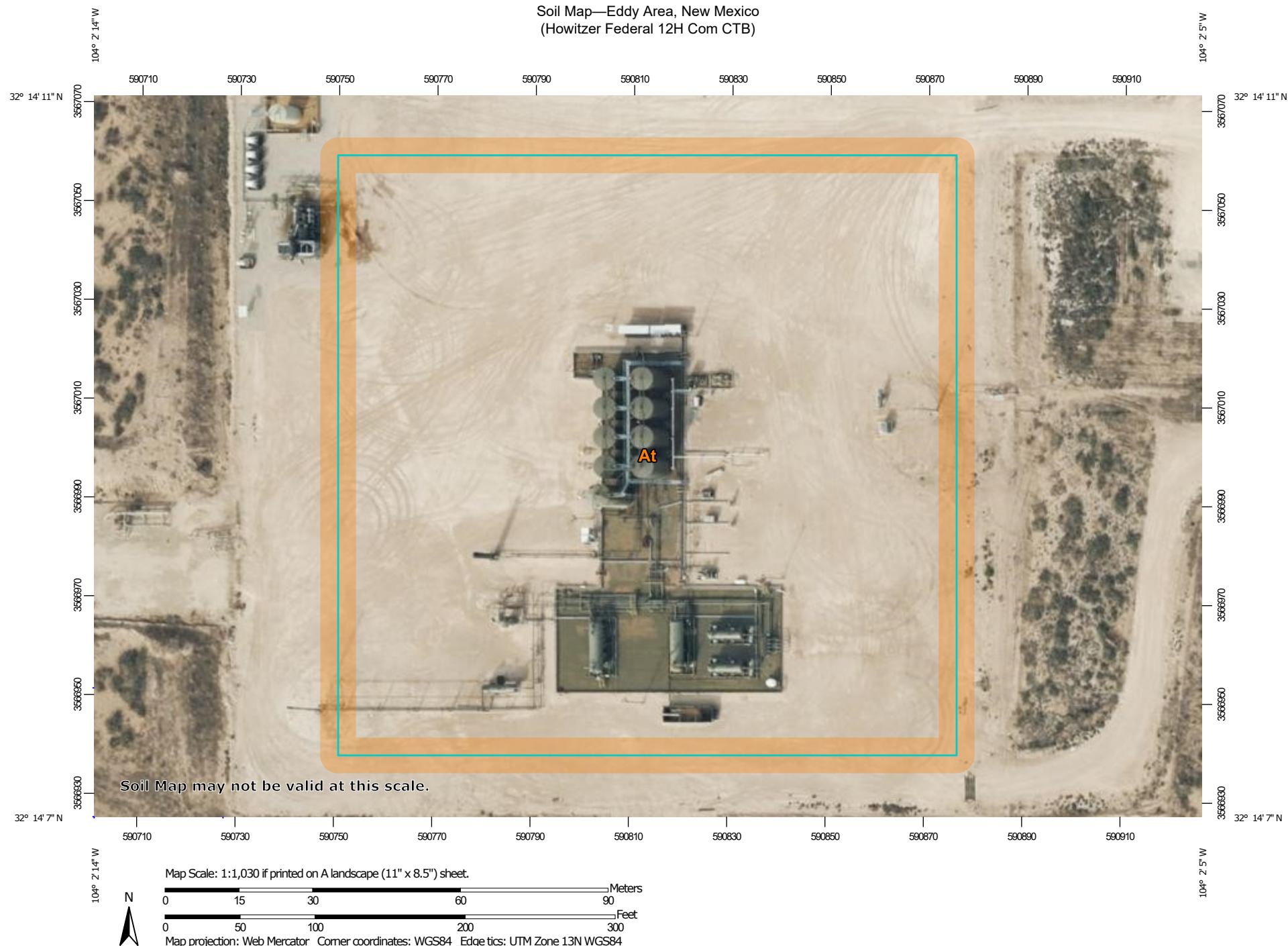
OWD

24.28.1.34771

Attachment 2

Site Characterization Documentation

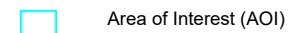
Soil Map—Eddy Area, New Mexico (Howitzer Federal 12H Com CTB)



Soil Map—Eddy Area, New Mexico
(Howitzer Federal 12H Com CTB)

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



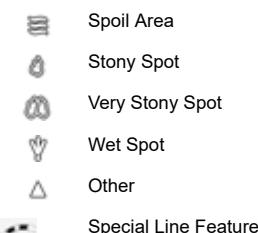
Sinkhole



Slide or Slip



Sodic Spot



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 21, Sep 9, 2025

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.



Soil Map—Eddy Area, New Mexico

Howitzer Federal 12H Com CTB

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
At	Atoka loam, 1 to 3 percent slopes	3.8	100.0%
Totals for Area of Interest		3.8	100.0%



Natural Resources
Conservation Service

Web Soil Survey
National Cooperative Soil Survey

12/11/2025
Page 3 of 3

Map Unit Description: Atoka loam, 1 to 3 percent slopes---Eddy Area, New Mexico

Howitzer Federal 12H Com CTB

Eddy Area, New Mexico

At—Atoka loam, 1 to 3 percent slopes

Map Unit Setting

National map unit symbol: 1w41

Elevation: 1,100 to 4,300 feet

Mean annual precipitation: 7 to 14 inches

Mean annual air temperature: 60 to 70 degrees F

Frost-free period: 200 to 240 days

Farmland classification: Farmland of statewide importance

Map Unit Composition

Atoka and similar soils: 98 percent

Minor components: 2 percent

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

Description of Atoka

Setting

Landform: Plains

Landform position (three-dimensional): Riser

Down-slope shape: Convex

Across-slope shape: Linear

Parent material: Mixed alluvium

Typical profile

H1 - 0 to 8 inches: loam

H2 - 8 to 33 inches: loam

H3 - 33 to 37 inches: indurated

Properties and qualities

Slope: 1 to 3 percent

Depth to restrictive feature: 20 to 40 inches to petrocalcic

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: 15 percent

Maximum salinity: Very slightly saline to slightly saline (2.0 to 4.0 mmhos/cm)

Sodium adsorption ratio, maximum: 1.0

Available water supply, 0 to 60 inches: Moderate (about 6.4 inches)

Interpretive groups

Land capability classification (irrigated): 3e

Land capability classification (nonirrigated): 7e



Natural Resources
Conservation Service

Web Soil Survey
National Cooperative Soil Survey

12/11/2025
Page 1 of 2

Map Unit Description: Atoka loam, 1 to 3 percent slopes---Eddy Area, New Mexico

Howitzer Federal 12H Com CTB

Hydrologic Soil Group: C
Ecological site: R070BC007NM - Loamy
Hydric soil rating: No

Minor Components

Atoka

Percent of map unit: 1 percent
Ecological site: R070BC007NM - Loamy
Hydric soil rating: No

Upton

Percent of map unit: 1 percent
Ecological site: R070BC025NM - Shallow
Hydric soil rating: No

Data Source Information

Soil Survey Area: Eddy Area, New Mexico

Survey Area Data: Version 21, Sep 9, 2025



**Natural Resources
Conservation Service**

Web Soil Survey
National Cooperative Soil Survey

12/11/2025
Page 2 of 2

Karst Potential Map



12/3/2025, 11:56:51 AM

Karst Occurrence Potential

Medium

1.9,028
0 0.05 0.1 0.2 0.4 km
0 0.1 0.2

BLM, OCD, New Mexico Tech, Vantor



National Wetlands Inventory

Wetlands Map



December 11, 2025

Wetlands

- █ Estuarine and Marine Deepwater
- █ Estuarine and Marine Wetland

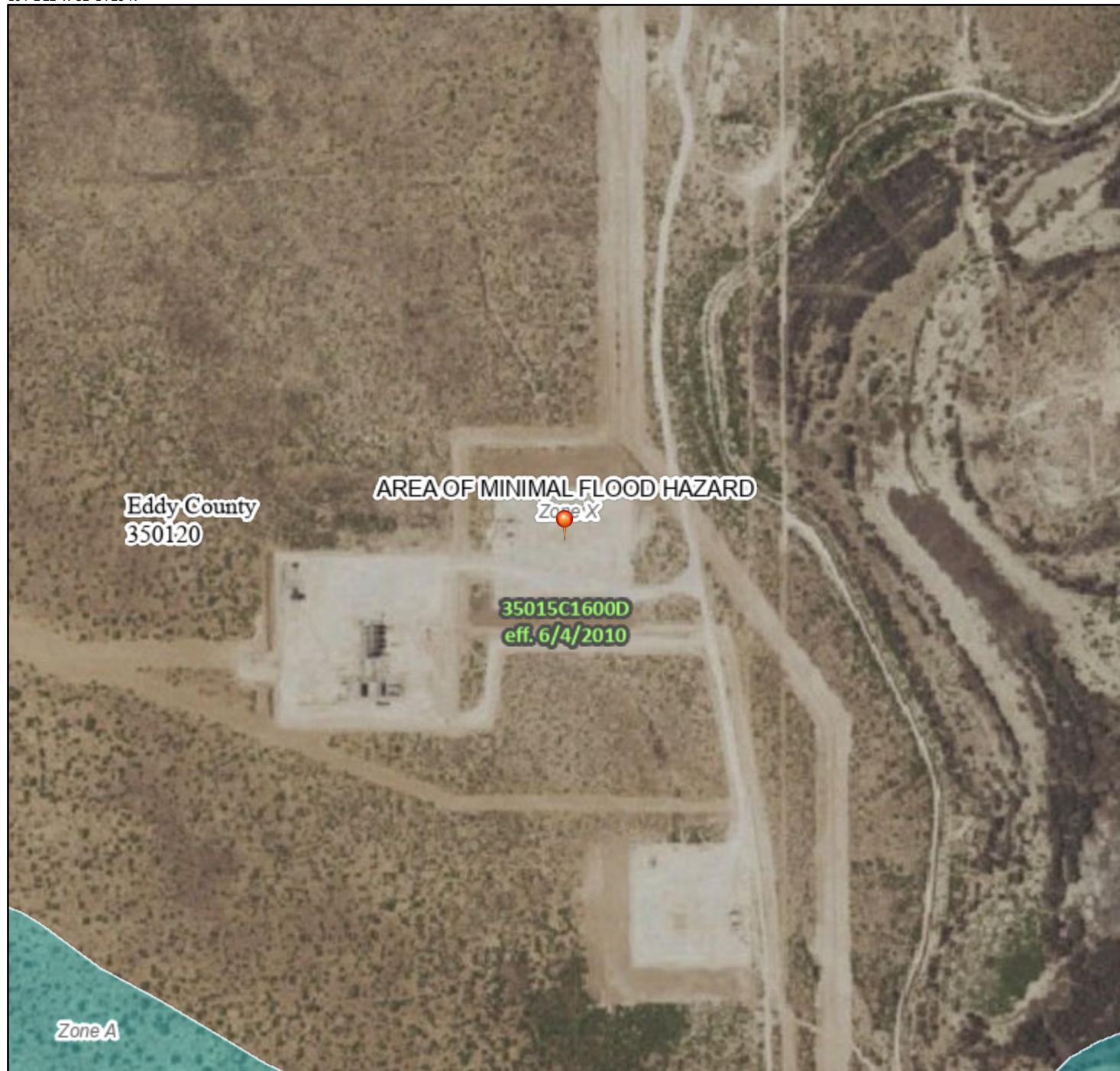
- █ Freshwater Emergent Wetland
- █ Freshwater Forested/Shrub Wetland
- █ Freshwater Pond
- █ Lake
- █ Other
- █ Riverine

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°2'22"W 32°14'28"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

- 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 OF FLOOD HAZARD

- NO SCREEN Area of Minimal Flood Hazard Zone X
- Effective LOMRs

OTHER AREAS

- Area of Undetermined Flood Hazard Zone D

GENERAL STRUCTURES

- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

- 20.2 Cross Sections with 1% Annual Chance
- 17.5 Water Surface Elevation

- 8 - - - Coastal Transect

- ~~~ 513 ~~~ Base Flood Elevation Line (BFE)

- Limit of Study

- Jurisdiction Boundary

- Coastal Transect Baseline

- Profile Baseline

- Hydrographic Feature

- 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 11/26/2025 at 8:10 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 3

Photographic Documentation

COG Operating, LLC
Howitzer 12 Federal Com CTB
Incident No. nAPP2528130624
Eddy County, New Mexico



Photo 1 View of facility sign.



Photo 2 View towards southwest of secondary containment.



Photo 3 View of west side of secondary containment towards north.

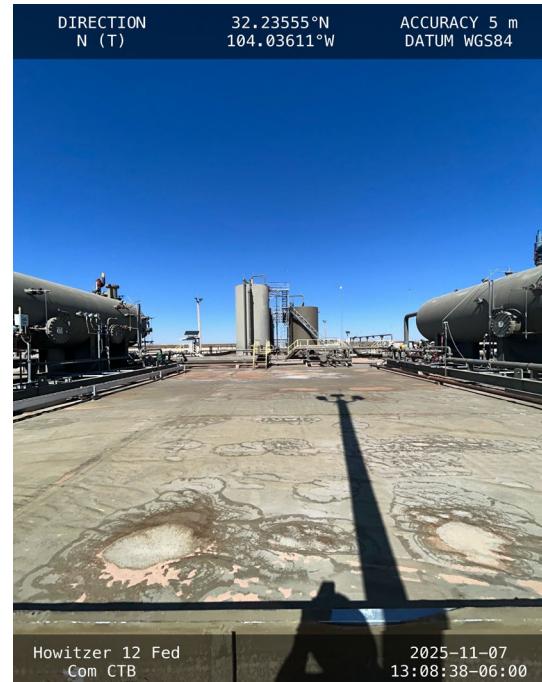


Photo 4 View of central portion of secondary containment.

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 536111

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 536111
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2528130624
Incident Name	NAPP2528130624 HOWITZER 12 FEDERAL COM CTB @ FAPP2129338142
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Facility	[fAPP2129338142] Howitzer 12 Fed Com CTB

Location of Release Source	
Please answer all the questions in this group.	
Site Name	Howitzer 12 Federal Com CTB
Date Release Discovered	09/16/2025
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: Corrosion Other (Specify) Produced Water Released: 7 BBL Recovered: 4 BBL Lost: 3 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 536111

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 536111
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	No
Reasons why this would be considered a submission for a notification of a major release	<i>Unavailable.</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.

Initial Response	
<i>The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury.</i>	
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: Jacqui Harris Title: Sr Environment Engineer Email: jacqui.harris@conocophillips.com Date: 12/18/2025
--	--

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 536111

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 536111
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS**Site Characterization**

Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after 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 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	Between ½ and 1 (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	Medium
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

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
<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	10/16/2025
On what date will (or did) the final sampling or liner inspection occur	11/07/2025
On what date will (or was) the remediation complete(d)	11/06/2025
What is the estimated surface area (in square feet) that will be remediated	16000
What is the estimated volume (in cubic yards) that will be remediated	0

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

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

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 536111

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 536111
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Remediation Plan (continued)

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

This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:

(Select all answers below that apply.)

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.

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

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

I hereby agree and sign off to the above statement	Name: Jacqui Harris Title: Sr Environment Engineer Email: jacqui.harris@conocophillips.com Date: 12/18/2025
--	--

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

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 536111

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 536111
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	523246
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	11/07/2025
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	16000

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	16000
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	Liner Inspected

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: Jacqui Harris Title: Sr Environment Engineer Email: jacqui.harris@conocophillips.com Date: 12/18/2025

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

CONDITIONS

Action 536111

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 536111
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
rhamlet	We have received your Remediation Closure Report for Incident #nAPP2528130624 Howitzer 12 Federal Com CTB, thank you. This Remediation Closure Report is approved.	1/7/2026