



February 16, 2023

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

**Re: Liner Inspection and Closure Request
ConocoPhillips (Heritage Concho)
Gadwall 35 #1H Tank Battery Release
Unit Letter A, Section 35, Township 24 South, Range 32 East
Lea County, New Mexico
Incident ID# NAPP2302439496**

Sir or Madam:

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips to assess a release that occurred from a tank leak at the Gadwall 35 #1H Tank Battery. The release footprint is located in Public Land Survey System (PLSS) Unit Letter A, Section 35, Township 24 South, Range 32 East, in Lea County, New Mexico (Site). The approximate release point occurred at coordinates 32.18053°, -103.640360°, as shown on Figures 1 and 2.

BACKGROUND

According to the State of New Mexico Form C-141 Initial Report (Appendix A), the release was discovered on January 13, 2023. The release occurred as the result of hole in an oil tank. Approximately 20 barrels (bbls) of oil were reported released, of which 10 bbls were recovered by vacuum trucks immediately following discovery. The fluid was released into a lined secondary containment around the tanks and wholly contained. The initial Form C-141 was submitted on January 24, 2023, the NMOCD approved the initial C-141 the same day, and subsequently assigned the release the Incident ID NAPP2302439496.

SITE CHARACTERIZATION

A site characterization was performed and no sinkholes, residences, schools, hospitals, institutions, churches, streams, springs, private domestic water wells, wetlands, incorporated municipal boundaries, subsurface mines, or floodplains are located within the distances specified in 19.15.29 New Mexico Administrative Code (NMAC). The Site is in an area of low karst potential.

According to the New Mexico Office of the State Engineers (NMOSE) reporting system, there are no water wells within ½ mile (800 meters) of the Site. There are two (2) water wells within 4.500 meters of the site with an average depth to groundwater of 202 feet below ground surface (bgs). The site characterization data is included in Appendix B.

REGULATORY FRAMEWORK

Based upon the release footprint and in accordance with Subsection E of 19.15.29.12 NMAC, per 19.15.29.11 NMAC, the site characterization data was used to determine recommended remedial action levels (RRALs) for benzene, toluene, ethylbenzene, and xylene (collectively referred to as BTEX), total petroleum hydrocarbons (TPH), and chlorides in soil.

Tetra Tech

901 West Wall St., Suite 100, Midland, TX 79701

Tel 432.682.4559

Fax 432.682.3946

www.tetrattech.com

Based on the relative absence of water wells within ½ mile of the Site, the strictest Table I closure criteria will be applied to this release incident in lieu of drilling a boring for groundwater depth verification. Thus, based on the site characterization, and in accordance with Table I of 19.15.29.12 NMAC, the RRALs for the Site are as follows:

Constituent	Site RRAL
Chloride	600 mg/kg
TPH (GRO+DRO+ORO)	100 mg/kg
BTEX	50 mg/kg
Benzene	10 mg/kg

SITE VISIT SUMMARY

Photographs were provided to Tetra Tech by COP personnel prior to the site visit. These photographs indicated the general release area footprint inside the containment. On January 18, 2023, Tetra Tech personnel were at the Site to assess current site conditions and collect photographs of the release area. These initial January photographs are included in Appendix C.

During the site visit, it was apparent that all free liquids appeared to have been recovered, and the remaining released fluids held in the base course material within the secondary containment. The secondary containment is made up of earthen berms approximately 2 feet tall with an intact polyethylene liner. As mentioned, the release was reported as having been contained within the lined secondary containment and, as documented in the C-141, initial response efforts were successful in recovering 10 bbls of released fluids. Photographic documentation of site conditions at the time of the site visit is included in Appendix C.

REMEDIAL ACTIVITIES

On January 25, 2023, COP Operations personnel were at the Site to complete the removal of potentially impacted base course/gravel material within the secondary containment. The base course material that was saturated or visibly stained was removed and properly disposed of at an approved facility.

As a result of a miscommunication between Tetra Tech and COP Operations personnel, clean base course material was placed and graded inside the tank battery secondary containment before the liner inspection could be officially completed by Tetra Tech. Photographic documentation of the January 2023 remedial activities is included in Appendix C

LINER INTEGRITY

In accordance with 19.15.29.11(A)(5)(a) NMAC, notification of a liner inspection at the Gadwall 35 #1H Tank Battery was sent via email to the NMOCD on January 27, 2023. The liner inspection notification email correspondence is included in Appendix D.

Thus, on February 1, 2022, Tetra Tech personnel performed an inspection of the liner within the secondary containment of the Gadwall 35 #1H Tank Battery. Due to the liner being covered with clean material resulting from the previously mentioned January 25 activities, base course material was removed by hand in order to expose the polyethylene liner. The clean base course/gravel material was carefully extracted from the area surrounding Tank #3 and the surrounding vicinity. The liner was observed to underlie the tank battery secondary containment area. The liner was intact, with no visible rips or tears and encompassed by a 2-foot-tall earthen berm. The liner extended up and over the earthen berm and was anchored on the exterior side. Photographic documentation of the liner inspection is included in Appendix C.

Based on photographs of the release area immediately following the release discovery, the released fluids pooled within the secondary containment allowing substantial recovery of fluids by vacuum truck. The standing fluid observed in photographs lends further evidence to the integrity of the liner as a competent fluid barrier.

Liner Inspection and Closure Report
February 16, 2023

ConocoPhillips

CONCLUSION

Based on the results of the liner inspection, ConocoPhillips respectfully requests closure of the subject incident. The release occurred within a lined containment area. The liner integrity demonstration is complete. The affected area of the liner has been visually inspected where the release occurred, and the liner remains intact and had the ability to contain the leak in question. Two business days' notice was provided to the appropriate division district office before conducting the liner inspection.

The final C-141 forms are enclosed in Appendix A. If you have any questions concerning the liner inspection for the Site, please call me at (432) 210-6952 or Christian at (512) 288-6281.

Sincerely,
Tetra Tech, Inc.



Colton Bickerstaff
Project Manager



Christian M, Lull, P.G
Program Manager

cc:

Mr. Charles Beauvais, PBU - ConocoPhillips

LIST OF ATTACHMENTS

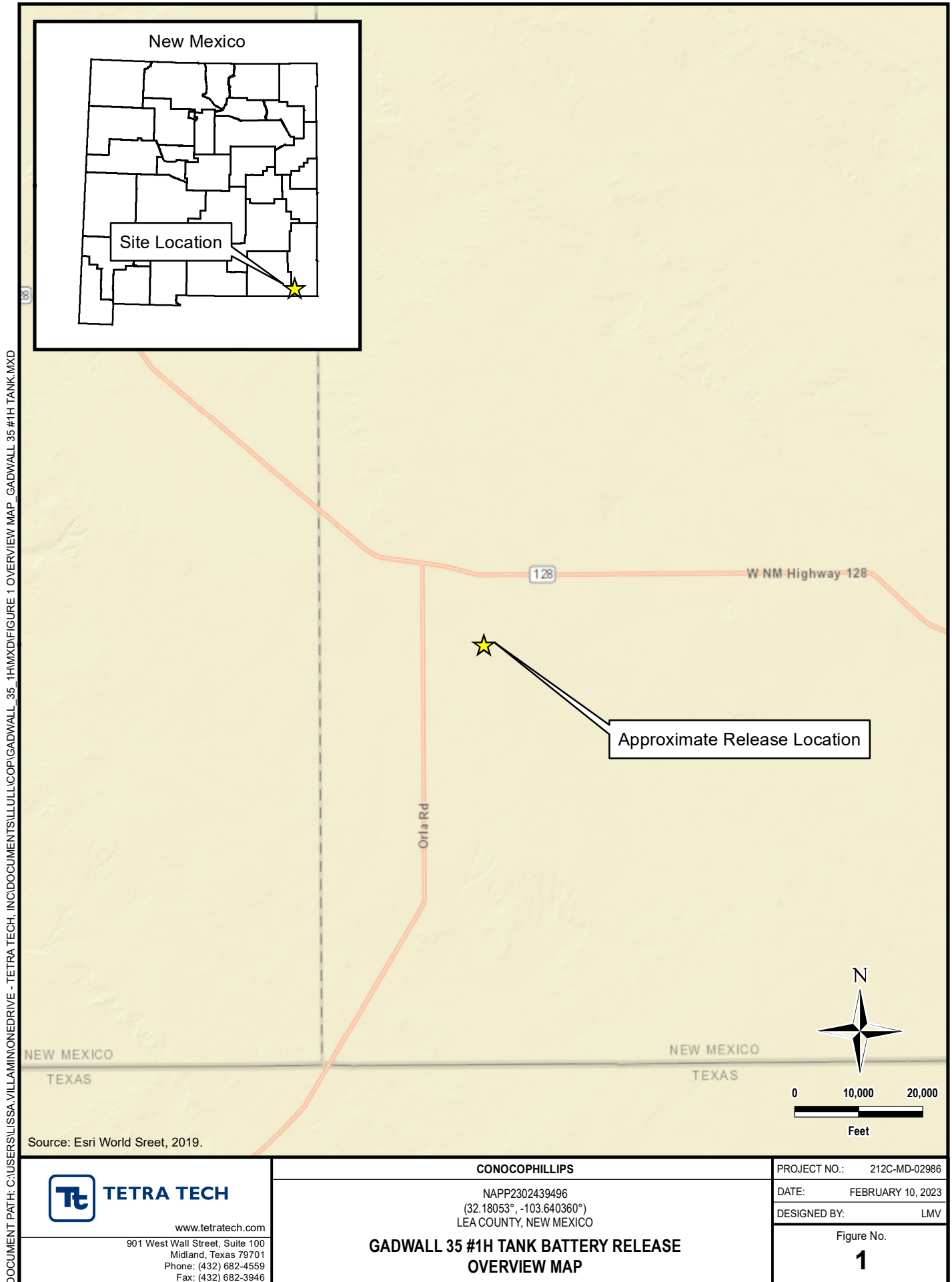
Figures:

- Figure 1 – Overview Map
- Figure 2 – Topographic Map
- Figure 3 – Approximate Release Extent

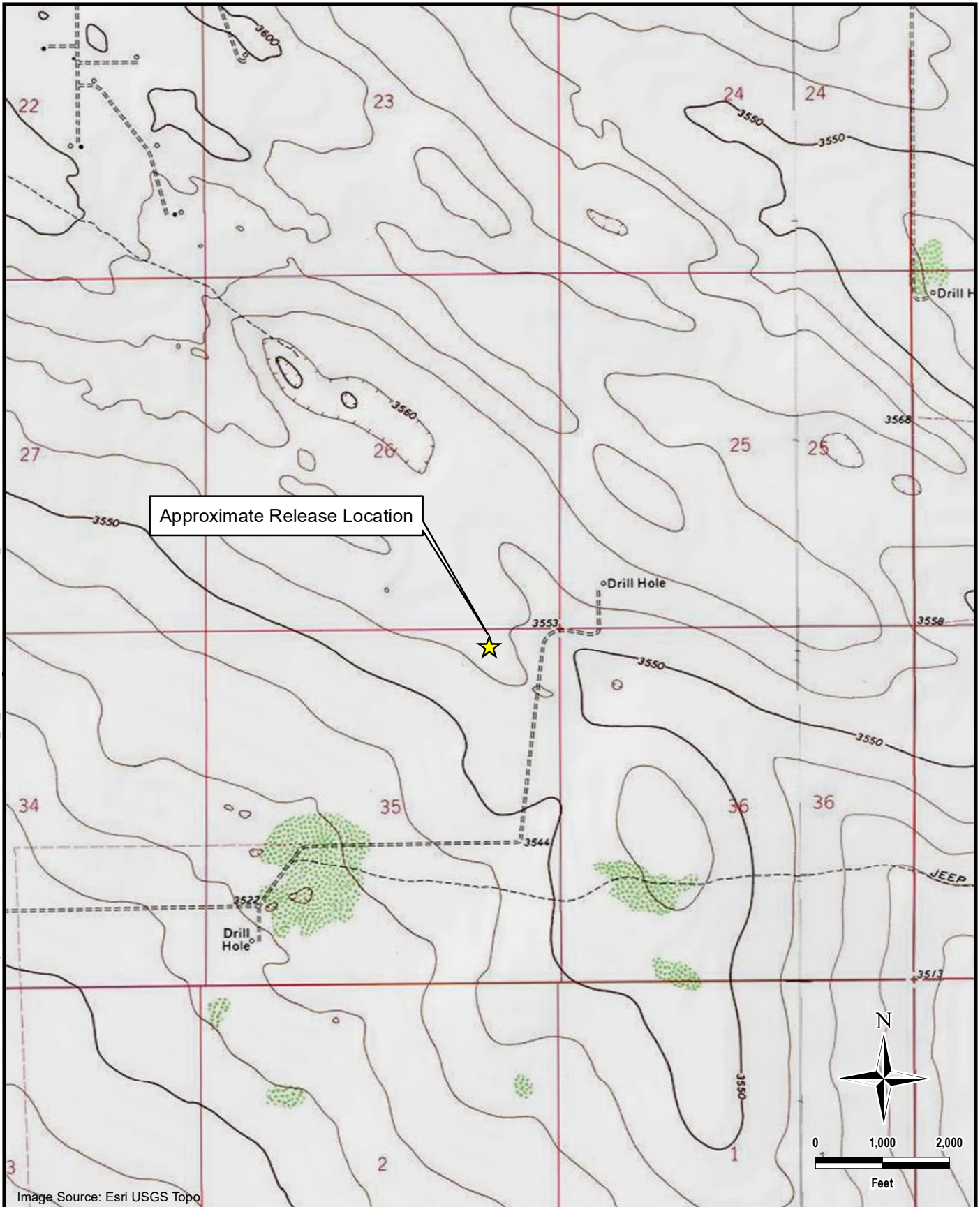
Appendices:

- Appendix A – C-141 Forms
- Appendix B – Site Characterization Data
- Appendix C – Photographic Documentation
- Appendix D – Regulatory Correspondence

FIGURES



DOCUMENT PATH: C:\USERS\LISSA.VILLAMONEDRIVE - TETRA TECH\INC\DOCUMENTS\TULLULCOP\GADWALL_35_1HMX\FIGURE 2 TOPO MAP_GADWALL_35 #1H TANK.MXD



TETRA TECH

www.tetrattech.com

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

CONOCOPHILLIPS

NAPP2302439496
(32.18053°, -103.640360°)
LEA COUNTY, NEW MEXICO

**GADWALL 35 #1H TANK BATTERY RELEASE
TOPOGRAPHIC MAP**

PROJECT NO.: 212C-MD-02986

DATE: FEBRUARY 10, 2023


DESIGNED BY: LMV

Figure No.

2

DOCUMENT PATH: C:\USERS\LISSA.VILLAMINONE\DRIVE - TETRA TECH\INC\DOCUMENTS\TULLULCOP\GADWALL_35_1HMX\FIGURE 3 APPROX RELEASE_GADWALL_35 #1H TANK.MXD



 TETRA TECH www.tetrattech.com 901 West Wall Street, Suite 100 Midland, Texas 79701 Phone: (432) 682-4559 Fax: (432) 682-3946	CONOCOPHILLIPS NAPP2302439496 (32.18053°, -103.640360°) LEA COUNTY, NEW MEXICO GADWALL 35 #1H TANK BATTERY RELEASE APPROXIMATE RELEASE EXTENT	PROJECT NO.: 212C-MD-02986 DATE: FEBRUARY 10, 2023 DESIGNED BY: LMV Figure No. 3
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APPENDIX A C-141 Forms

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

State of New Mexico
Energy Minerals and Natural
Resources Department

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

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

Incident ID	NAPP2302439496
District RP	
Facility ID	fAPP2203844367
Application ID	

Release Notification

Responsible Party

Responsible Party	COG Operating, LLC	OGRID	229137
Contact Name	Charles Beauvais	Contact Telephone	(575) 988-2043
Contact email	Charles.R.Beauvais@ConocoPhillips.com	Incident # (assigned by OCD)	NAPP2302439496
Contact mailing address	600 West Illinois Avenue, Midland, Texas 79701		

Location of Release Source

Latitude 32.1805 Longitude -103.6400
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	Gadwall 35 Federal 001H	Site Type	Tank Battery
Date Release Discovered	January 13, 2023	API# (if applicable)	30-025-40364

Unit Letter	Section	Township	Range	County
A	35	24S	32E	Lea

Surface Owner: ☐ State ☒ Federal ☐ Tribal ☐ Private (Name: _____)

Nature and Volume of Release

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

<input checked="" type="checkbox"/> Crude Oil	Volume Released (bbls) 20	Volume Recovered (bbls) 10
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

The release was caused by a hole in a oil tank due to corrosion.
The release occurred within a gravel lined facility. A vacuum truck was dispatched to remove all freestanding fluids. Evaluation will be made of the spill area for any possible impact from the release.

State of New Mexico
Oil Conservation Division

Incident ID	NAPP2302439496
District RP	
Facility ID	fAPP2203844367
Application ID	

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

Initial Response

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

<input checked="" type="checkbox"/> The source of the release has been stopped.	
<input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment.	
<input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.	
<input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why: 	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
Printed Name: Brittany N. Esparza	Title: Environmental Technician
Signature: 	Date: 1/24/2023
email: Brittany.Esparza@ConocoPhillips.com	Telephone: (432) 221-0398
<u>OCD Only</u>	
Received by: Jocelyn Harimon	Date: 01/24/2023

Facility Name & Well Number(s):				Gadwall 35 #1				Release Discovery Date & Time:		1/13/23 9:30 AM		NAPP2302439496	
Provide any known details about the event:				Hole in oil tank			Primary Cause (dropdown):	Internal Corrosion - Other	Secondary Cause (dropdown):				
				Was the Release to Soil / Caliche (dropdown):	Release On/Off Pad (dropdown):	Recovered Volume (bbl.) (if available, not included in volume calculations)	Release Type (dropdown):		Method of Determination (dropdown):				
BU:	Permian	Asset Area:	DBE - Asset Avg.	No	On-Pad	10	Oil		Gauged volume				
Known Volume (dropdown):				Yes		Known Volume of Spill (bbl.)							
						20							

Received by OCD: 1/24/2023 11:00:18 AM

Page 5 of 4

Released to Imaging: 1/24/2023 2:45:00 PM

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

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

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

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

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

CONDITIONS

Action 179072

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 179072
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
jharimon	None	1/24/2023

Incident ID	
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization

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?	_____ (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did the release impact areas not on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

Characterization Report Checklist: *Each of the following items must be included in the report.*

- ☐ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☐ Field data
- ☐ Data table of soil contaminant concentration data
- ☐ Depth to water determination
- ☐ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- ☐ Boring or excavation logs
- ☐ Photographs including date and GIS information
- ☐ Topographic/Aerial maps
- ☐ Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

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

Printed Name: _____ Title: _____

Signature: Charles R. Beauvais II Date: _____

email: _____ Telephone: _____

OCD Only

Received by: Jocelyn Harimon Date: 02/16/2023

Incident ID	
District RP	
Facility ID	
Application ID	

Closure

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 (electronic submittals in .pdf format are preferred) 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.

Closure Report Attachment Checklist: *Each of the following items must be included in the closure report.*

- ☐ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☐ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☐ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☐ Description of remediation activities

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.

Printed Name: _____ Title: _____

Signature: Charles R. Beauvais II Date: _____

email: _____ Telephone: _____

OCD Only

Received by: Jocelyn Harimon Date: 02/16/2023

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: Jennifer Nobui Date: _____

Printed Name: _____ Title: _____

APPENDIX B

Site Characterization Data



New Mexico Office of the State Engineer

Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

(R=POD has been replaced, O=orphaned, C=the file is closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest)

(NAD83 UTM in meters)

(In feet)

POD Number	POD Sub-Code	basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	Distance	Depth Well	Depth Water	Water Column
C 04622 POD1	CUB	LE		3	3	4	24	24S	32E	629436	3563006	2150			
C 04536 POD1	C	LE		1	2	2	33	24S	32E	625019	3561244	3161	500	314	186
C 02312	CUB	LE		1	2	1	05	25S	33E	632292	3559772	4371	150	90	60

Average Depth to Water: **202 feet**

Minimum Depth: **90 feet**

Maximum Depth: **314 feet**

Record Count: 3

UTMNAD83 Radius Search (in meters):

Easting (X): 628180.88

Northing (Y): 3561260.5

Radius: 4500

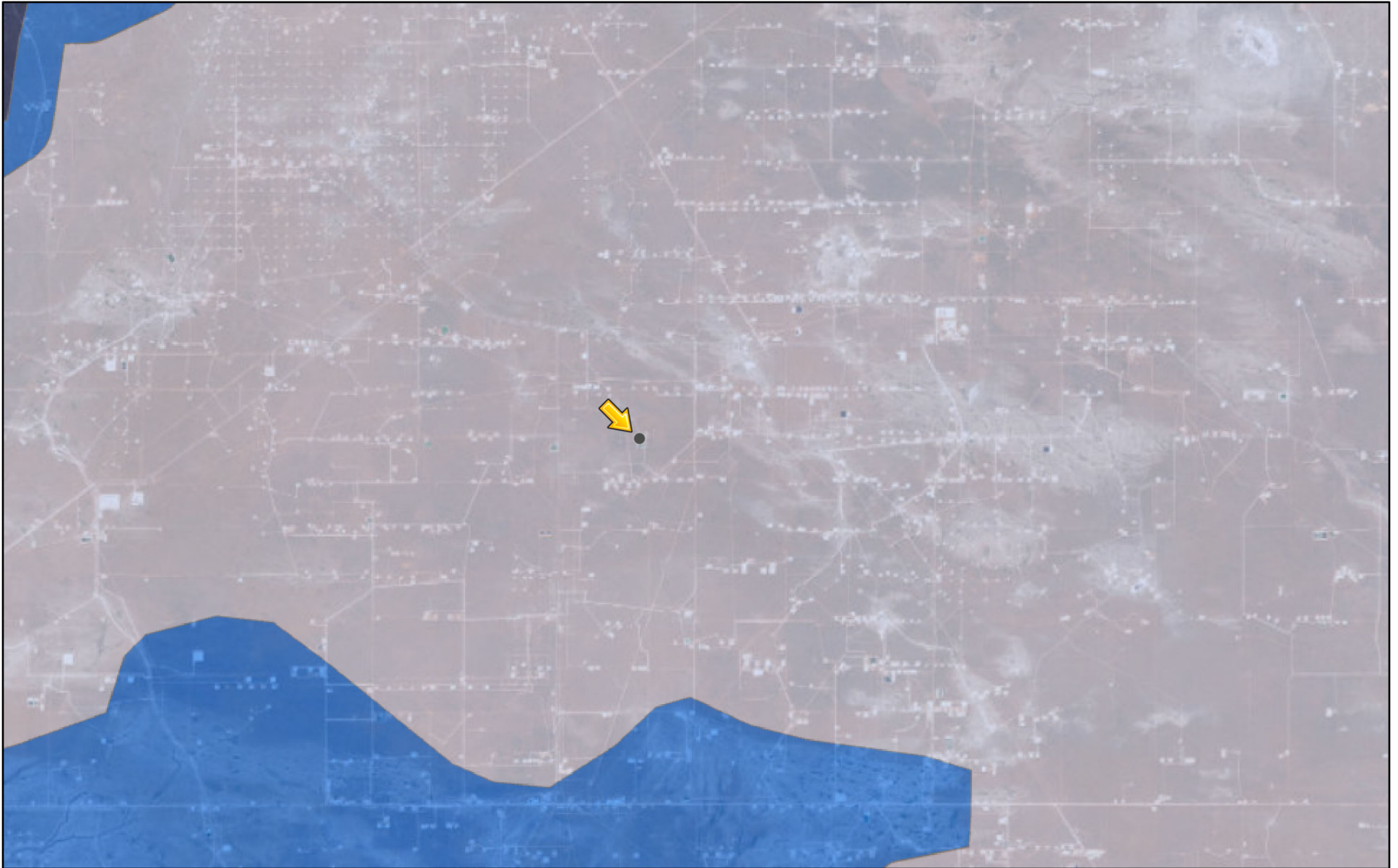
The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

2/9/23 2:58 PM


Page 1 of 1




WATER COLUMN/ AVERAGE
DEPTH TO WATER

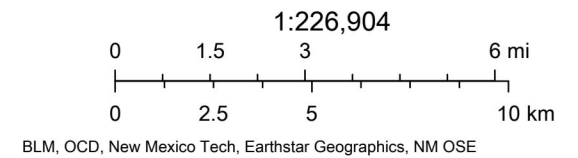
NMOCD Karst Potential



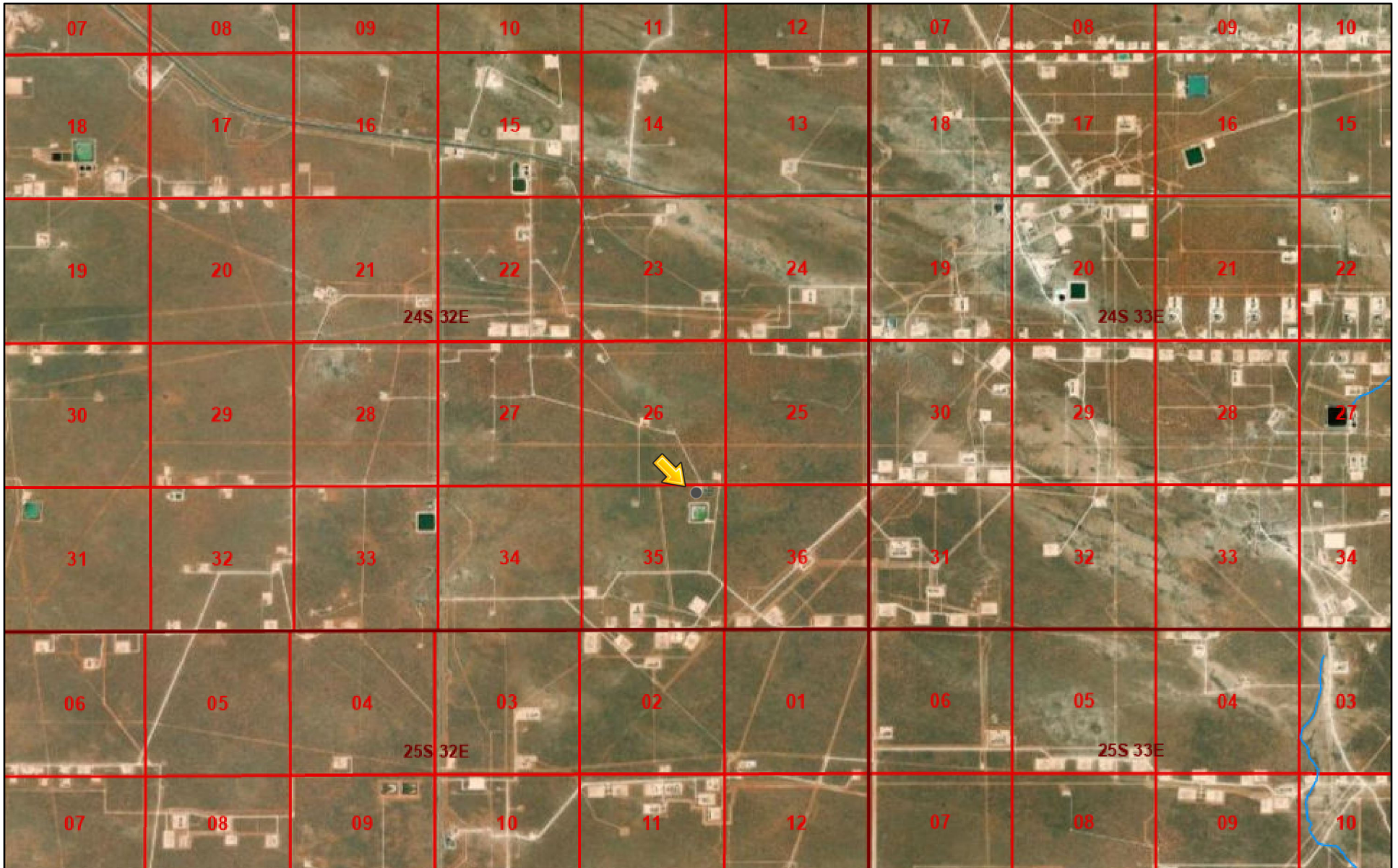
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 Override 1 Karst Occurrence Potential





	High		Medium
			Low

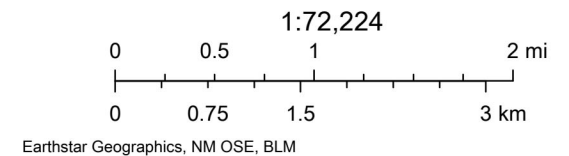


NMOCD Waterbodies Map



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 Override 1  OSE Streams  PLSS Townships
 PLSS First Division



APPENDIX C

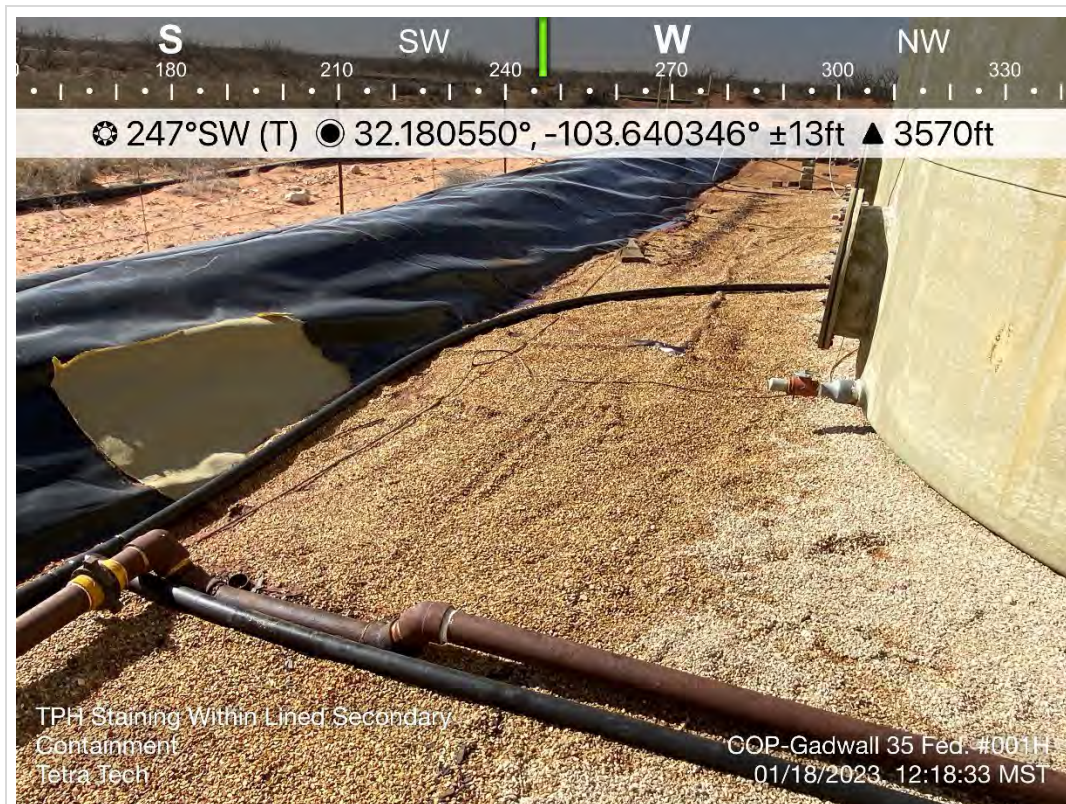
Photographic Documentation



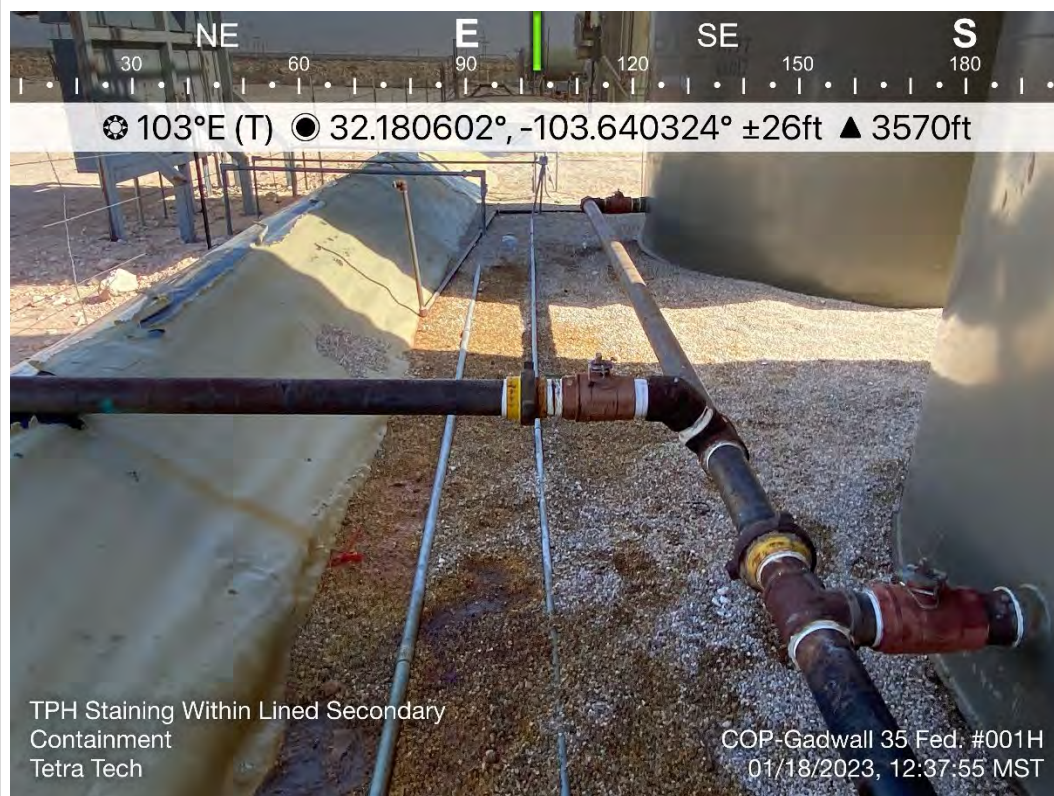
TETRA TECH, INC. PROJECT NO. 212C-MD-02986	DESCRIPTION	View east. Released fluids in southern portion of lined secondary containment.	1
	SITE NAME	Gadwall 35 #1H Tank Battery Release	1/13/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-02986	DESCRIPTION	View west. Released fluids in northern portion of lined secondary containment.	2
	SITE NAME	Gadwall 35 #1H Tank Battery Release	1/13/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-02986	DESCRIPTION	View south-southwest. Staining within northwestern portion of lined secondary containment.	3
	SITE NAME	Gadwall 35 #1H Tank Battery Release	1/18/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-02986	DESCRIPTION	View east. Staining within northern portion of lined secondary containment.	4
	SITE NAME	Gadwall 35 #1H Tank Battery Release	1/18/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-02986	DESCRIPTION	View west. Northwestern portion of lined secondary containment following removal of stained material.	5
	SITE NAME	Gadwall 35 #1H Tank Battery Release	1/25/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-02986	DESCRIPTION	View east. Northern portion of lined secondary containment following removal of stained material.	6
	SITE NAME	Gadwall 35 #1H Tank Battery Release	1/25/2023



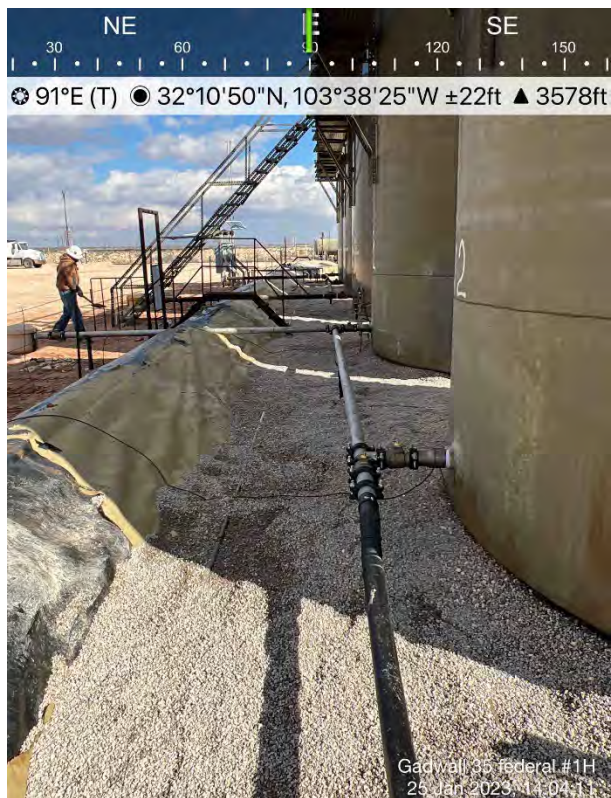
TETRA TECH, INC. PROJECT NO. 212C-MD-02986	DESCRIPTION	View northwest. Northwestern portion of lined secondary containment following removal of stained material.	7
	SITE NAME	Gadwall 35 #1H Tank Battery Release	1/25/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-02986	DESCRIPTION	View east. Southern portion of lined secondary containment following removal of stained material.	8
	SITE NAME	Gadwall 35 #1H Tank Battery Release	1/25/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-02986	DESCRIPTION	View east. Southern portion of lined secondary containment following placement of base course material.	9
	SITE NAME	Gadwall 35 #1H Tank Battery Release	1/25/2023



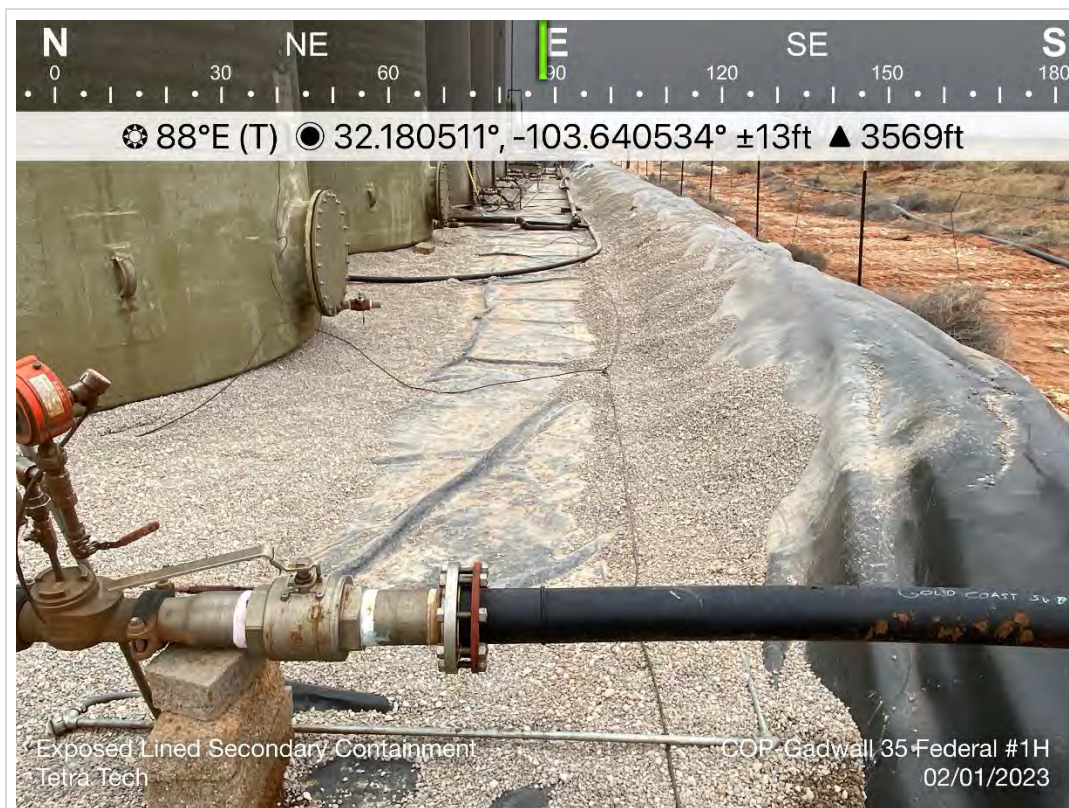
TETRA TECH, INC. PROJECT NO. 212C-MD-02986	DESCRIPTION	View east. Northern portion of lined secondary containment following placement of base course material.	10
	SITE NAME	Gadwall 35 #1H Tank Battery Release	1/25/2023



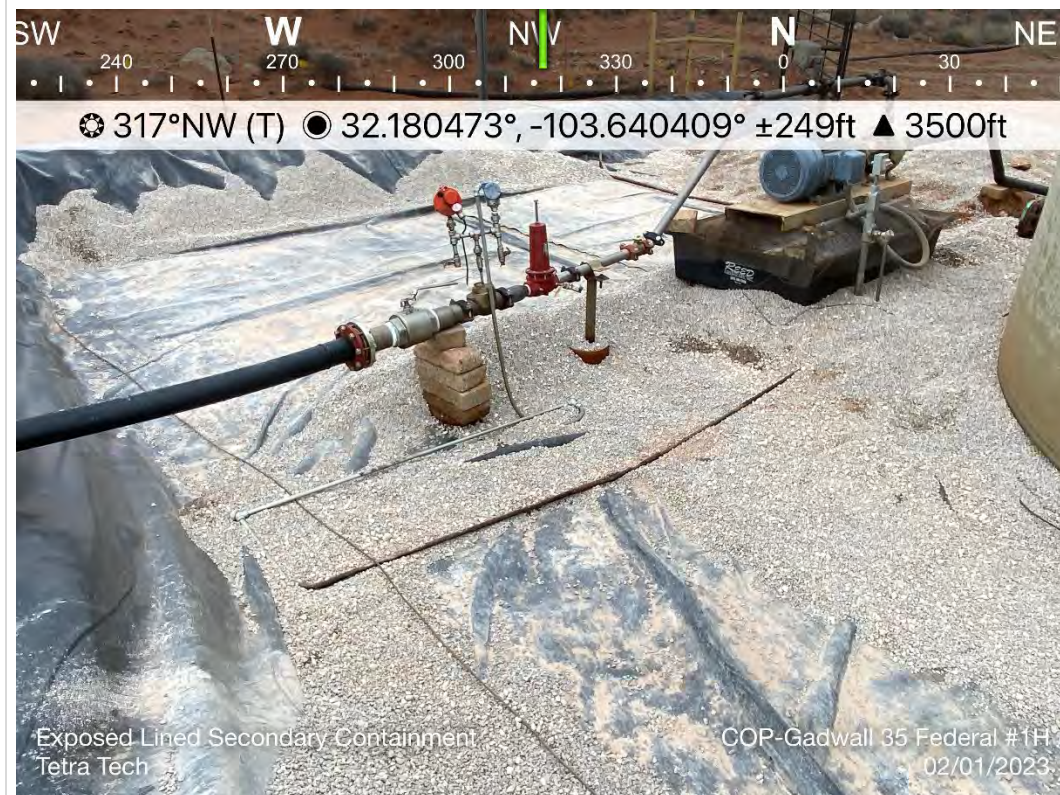
TETRA TECH, INC. PROJECT NO. 212C-MD-02986	DESCRIPTION	View east. Exposed liner in the northern portion of the lined secondary containment.	11
	SITE NAME	Gadwall 35 #1H Tank Battery Release	9/8/2022



TETRA TECH, INC. PROJECT NO. 212C-MD-02986	DESCRIPTION	View south-southeast. Exposed liner near the release source in the northern portion of the lined secondary containment.	12
	SITE NAME	Gadwall 35 #1H Tank Battery Release	9/8/2022



TETRA TECH, INC. PROJECT NO. 212C-MD-02986	DESCRIPTION	View east. Exposed liner in the northern portion of the lined secondary containment.	13
	SITE NAME	Gadwall 35 #1H Tank Battery Release	9/8/2022



TETRA TECH, INC. PROJECT NO. 212C-MD-02986	DESCRIPTION	View northwest. Exposed liner in the western portion of the lined secondary containment.	14
	SITE NAME	Gadwall 35 #1H Tank Battery Release	9/8/2022

APPENDIX D

Regulatory Correspondence

From: [Enviro, OCD, EMNRD](#)
To: [Bickerstaff, Colton](#)
Cc: [Bratcher, Michael, EMNRD](#); [Nobui, Jennifer, EMNRD](#)
Subject: RE: [EXTERNAL] Incident ID: NAPP2302439496 - Liner Inspection
Date: Monday, January 30, 2023 10:01:03 AM
Attachments: [image003.png](#)

CAUTION: This email originated from an external sender. Verify the source before opening links or attachments.

Colton,

Thank you for the notification. Please include a copy of this and all notifications in the remedial and/or closure reports to ensure the notifications are documented in the project file.

JH

Jocelyn Harimon • Environmental Specialist
Environmental Bureau
EMNRD - Oil Conservation Division
1220 South St. Francis Drive | Santa Fe, NM 87505
(505)469-2821 | Jocelyn.Harimon@emnrd.nm.gov
[http:// www.emnrd.nm.gov](http://www.emnrd.nm.gov)



From: Bickerstaff, Colton <Colton.Bickerstaff@tetrattech.com>
Sent: Friday, January 27, 2023 1:16 PM
To: Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>
Cc: Llull, Christian <Christian.Llull@tetrattech.com>
Subject: [EXTERNAL] Incident ID: NAPP2302439496 - Liner Inspection

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

Incident ID (n#) **NAPP2302439496** (Gadwall 35 #1 Tank Battery Release)

To whom it may concern,

In accordance with Subsection A of 19.15.29.11 NMAC, the responsible party must verbally notify the appropriate division district office prior to conducting the liner inspection.

Thus, on behalf of ConocoPhillips for the above referenced incident, Tetra Tech is duly providing this communication which serves as notification that a liner inspection will be conducted at this site on **February 1, 2023**.

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

Thank you,

Colton Bickerstaff

Colton Bickerstaff | Geologist

Phone: 432.250.9943 | Fax: 432.682.3946

Colton.Bickerstaff@tetrattech.com

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

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

CONDITIONS

Action 187399

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 187399
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
jnobui	Closure Approved.	2/23/2023