



June 14, 2024

Ms. Brittany Hall
Projects Environmental Specialist
Oil Conservation Division
New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505

**Re: Remediation Closure Report and Reclamation Work Plan
ConocoPhillips (Heritage COG Operating LLC)
Louise Fee #002 Battery Release
Unit Letter E, Section 10, Township 22 South, Range 27 East
Eddy County, New Mexico
Incident ID# nAB1819154956**

Ms. Hall,

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips Company (ConocoPhillips) to assess a historic release at the Louise Fee #002 (API No. 30-015-20264) Battery. The release footprint is located in Public Land Survey System (PLSS) Unit Letter E, Section 10, Township 22 South, Range 27 East, in Eddy County, New Mexico (Site). The approximate release point occurred at coordinates 32.4090958°, -104.1837769°, as shown on Figures 1 and 2. The release is located on privately-owned land.

BACKGROUND

According to the State of New Mexico Oil Conservation Division (NMOCD) C-141 Initial Report, the release was discovered on July 7, 2018. The release consisted of 6 barrels (bbls) of oil and 6 bbls of produced water, of which 2 bbls of oil and 2 bbls of produced water were recovered. The release was caused by a hole in the fire tube. During initial response activities, free standing fluids were recovered utilizing a vacuum truck. The NMOCD approved the initial C-141 on July 9, 2018, and subsequently assigned the release the Incident ID nAB1819154956. The initial C-141 form is included in Appendix A.

This incident is included in an Agreed Compliance Order-Releases (ACO-R) between COG Operating LLC (Concho) and the NMOCD signed on November 20 and 26, 2018, respectively.

SITE CHARACTERIZATION

A site characterization was performed and no sinkholes, residences, schools, hospitals, institutions, churches, springs, private domestic water wells, playa lakes, wetlands, incorporated municipal boundaries, or subsurface mines are located within the distances specified in 19.15.29 New Mexico Administrative Code (NMAC). The site is located approximately 250 feet north of the Pecos River. The Site is located within a FEMA Zone A floodplain. The Site is in an area of medium karst potential.

There are no water wells with groundwater data less than 25 years old listed in the New Mexico Office of the State Engineer (NMOSE) database located within approximately ½ mile (800 meters) of the site. According to data from one (1) water well listed in the NMOSE database within approximately 0.73 miles (1,177 meters) of the site, the minimum depth to groundwater is 18 feet bgs. The site characterization data is presented in Appendix B.

Tetra Tech

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REGULATORY FRAMEWORK

Based upon the release footprint, location within a floodplain and relative proximity to the Pecos River, 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.

Based on the site characterization conducted by Tetra Tech 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+MRO)	100 mg/kg
BTEX	50 mg/kg
Benzene	10 mg/kg

INITIAL SITE ASSESSMENT SUMMARY

BBC International (BBC) conducted the initial site assessment on February 4 and March 21, 2019, on behalf of COG Operating LLC (Concho). Three (3) soil borings (SP1 through SP3) were installed to depths of 6 feet bgs within the release extent to achieve vertical delineation. Four (4) sample borings (North, East, South, and West) were installed along the perimeter of the release to achieve horizontal delineation. Figure 3 shows the approximate release extent and sample locations from the initial assessment. The results of the initial soil assessment are summarized in Table 1.

BBC submitted a Delineation Work Plan (Work Plan) dated April 9, 2019, which described the initial site assessment activities and a remediation plan. The Work Plan requested a deferment of full remediation activities until the decommissioning of this facility due to the existing production equipment and piping preventing full access. However, the Work Plan proposed performing a partial remediation to excavate the entire leak area to a depth of 1 foot bgs. The estimated volume of material proposed for removal was 30 cubic yards.

The Delineation Work Plan Report was rejected by NMOCD on November 30, 2022, with the following comments:

- *“Workplan and deferral request denied. Due to the shallow depth of groundwater, the site being located in a floodplain, and it's close proximity to the Pecos River: a deferral of the release could cause an imminent risk to human health, the environment, or ground water.*
- *2RP-4847 closed. Please refer to incident #NAB1819154956 for all future communication.*
- *Please submit a complete report through the OCD Permitting website by 3/3/2023.”*

An extension request for a due date of June 1, 2023, was approved via email on Tuesday, February 28, 2023. Copies of the regulatory correspondence are included in Appendix C.

ADDITIONAL SITE ASSESSMENT

In March and April 2023 Tetra Tech completed additional site assessment activities at the Louise Fee #002 Release Site. Assessment activities consisted of advancing nine (9) soil borings (AH-23-1 through AH-23-9) via hand auger to better discern the footprint of the release and evaluate current concentrations of TPH, BTEX, and chloride. Borings AH-23-1 through AH-23-3 were installed to depths of 5 feet bgs, and boring AH-23-4 was installed to a depth of 6 feet bgs in an attempt to obtain vertical delineation. Borings AH-23-5 through AH-23-9 were installed to depths of 1-foot bgs to further delineate the release horizontally.

A total of twenty-two (22) samples were submitted to Cardinal Laboratories in Hobbs, New Mexico (Cardinal) to be analyzed for TPH by EPA Method 8015 modified, BTEX by EPA Method 8021B, and chloride by Standard Method SM4500Cl-B. The analytical results associated with boring locations AH-23-1, AH-23-2, AH-23-3, and AH-23-8 were above the TPH RRAL of 100 mg/kg in the 0-1 foot sample interval. The analytical results associated with boring location AH-23-4 exceeded the TPH RRAL in all sampling intervals to the total depth of 6 feet bgs.

A second 90-day extension was requested via email on June 6, 2023, and was approved by NMOCD for a due date of August 30, 2023. A copy of the extension request can be found in the Regulatory correspondence included in Appendix C.

ADDITIONAL DELINEATION

On June 21, 2023, Tetra Tech re-mobilized to the site with a truck-mounted air rotary drilling rig to attempt to vertically define the location of AH-23-4. Due to the presence of numerous lines and active production equipment on-site, the drilling rig access was limited. One boring (BH-1) was installed approximately 13 feet northeast of the previously sampled AH-23-4 location. Boring BH-1 was installed to an approximate depth of 6 feet bgs. Four (4) soil samples were collected from the boring and submitted to Cardinal for analysis. Analytical results associated with the 0-1 foot bgs sampling interval at BH-1 were above the TPH RRAL. The remainder of the analytical samples from the boring were below the proposed RRALs.

As the larger truck-mounted drilling had difficulty accessing the area of AH-23-4, Tetra Tech personnel returned to the site on September 14, 2023 with a smaller direct push Geoprobe unit to install an additional boring (BH-2) and three (3) additional hand auger borings (AH-23-10 through AH-23-12). The purpose of the additional assessment was to further define the vertical extent of soil impacts. Boring BH-2 was installed to a total depth of 17 feet bgs in the area of AH-23-4. Hand auger borings AH-23-10 through AH-23-12 were installed to depths of 3 feet bgs to further define the release extent. The boring log for BH-2 is included as Appendix D.

A total of twelve (12) samples were collected from the four (4) additional assessment borings and submitted to Cardinal for analysis. Analytical results associated with the 0-1 foot sample at AH-23-10 exceeded the chloride RRAL of 600 mg/kg. Analytical results associated with the 2-3 foot sample interval at AH-23-12 and in samples collected from the top 10 feet of boring BH-2 exceeded the TPH RRAL of 100 mg/kg. Vertical delineation of TPH impacts above the RRAL (100 mg/kg) was achieved in boring BH-2 at 11 feet bgs. The release footprint is now both horizontally and vertically delineated.

The 2023 assessment sample locations are shown on Figure 4. The results of the 2023 soil assessment activities are summarized in Table 2. Photographic documentation of the 2023 soil assessment is presented in Appendix E.

A third 90-day extension was requested via email on September 28, 2023, which was approved by NMOCD for November 28, 2023. A copy of the extension request can be found in the Regulatory Correspondence included in Appendix C.

VARIANCE REQUEST AND NMOCD REJECTION

In a Revised Release Characterization and Remediation Work Plan dated November 17, 2023, ConocoPhillips proposed to remediate the release extent to the maximum extent practicable. The revised plan included a variance request to leave impacted soils (with concentrations greater than those specified in Table I) located below 6 feet bgs in place out of safety concerns and to place a liner throughout the base of the excavation at 4 feet bgs. The reasons for the variance request included the following:

- The release impact is fully delineated, and the release footprint is located in areas immediate around active tank battery production equipment where any further excavation could cause a major facility deconstruction, and/or additional unwanted impact to the environment.

- Soils at the site are primarily sands and sandy clays, and deepening the excavation immediately around the in-place production equipment compromises the equipment foundations and poses a significant safety hazard.
- The proposed remediation extents will remove all soils impacted above the Site RRALs with one exception; the 9-10 foot interval in boring BH-2 had a TPH result of 142.9 mg/kg, slightly exceeding the RRAL of 100 mg/kg.
- The sampling intervals both above (7-8 feet bgs) and below (11-12 feet bgs) this interval had TPH results which were below the reporting limit of 10 mg/kg for each of the TPH fractions.

The NMOCD rejected the variance request via email on November 20, 2023 for the following reasons:

- *"Variance request denied. Due to the shallow depth of groundwater, the site being located in a floodplain, and it's close proximity to the Pecos River; a variance proposed to leave contaminants in place could cause an imminent risk to human health, the environment, or groundwater. Downward migration of remaining contaminants due to infiltration of surface water is not the only mechanism that can lead to impacts to freshwater.*
- *OCD is requesting a soil boring be drilled as close as possible to the release area in order to determine an accurate depth to groundwater. If groundwater is encountered in the boring, a sample will need to be collected and analyzed. In lieu of drilling a soil boring, the area of the release will need to be remediated to the most stringent standards.*
- *Submit a complete report through the OCD Permitting website by 1/1/2023."*

A copy of the regulatory correspondence is included in Appendix C.

REVISED WORK PLAN AND NMOCD APPROVAL

Tetra Tech, on behalf of ConocoPhillips, prepared a Release Characterization and Remediation Work Plan - Revision 2 dated December 14, 2023. The plan described the results of the release assessment and provided characterization of the impact at the Site. ConocoPhillips proposed to remove soils that exceeded the Site reclamation limits and RRALs as determined by the results of the assessment activities.

The Release Characterization and Remediation Work Plan - Revision 2 was approved via email by Brittany Hall of the NMOCD on December 19, 2023 with the following comments:

- *"Remediation plan approved. Ensure faces of the near vertical surfaces of the benched excavation are included in the 5-point composite confirmation samples.*
- *Submit a complete report through the OCD Permitting website by 4/26/2024."*

In an email dated May 1, 2024, the NMOCD approved a new due date of June 26, 2024 for the remediation closure report. Copies of the regulatory correspondence are included in Appendix C.

REMEDIAL ACTIVITIES AND CONFIRMATION SAMPLING

From May 7-16, 2024, Tetra Tech personnel were onsite to supervise the remedial activities proposed in the approved Release Characterization and Remediation Work Plan - Revision 2, including excavation, disposal, and confirmation sampling. Prior to confirmation sampling, on May 9, 2024, the NMOCD district office was notified via the OCD Portal in accordance with Subsection D of 19.15.29.12 NMAC. Documentation of associated regulatory correspondence is included in Appendix C.

Impacted soils were excavated as indicated in Figure 5. The areas within the release footprint were excavated to a maximum depth of 10 feet below surrounding grade. Due to safety concerns associated with working around pressurized lines, impacted soils were excavated by hand in the immediate vicinity of production lines. Photographs from the excavated areas prior to backfill are provided in Appendix E.

All excavated material was transported offsite for proper disposal. Approximately 70 cubic yards of material were transported to the R360 Permian Basin facility. Copies of the waste manifests are included in Appendix F.

Following excavation, confirmation floor and sidewall samples were collected and submitted for laboratory analysis to verify efficacy of remediation activities. Per the NMOCD-approved confirmation sampling plan, confirmation samples were collected such that each 5-point composite sample (sidewall and floor) was representative of no more than 200 square feet of excavated area. Six (6) five-point composite confirmation floor samples and seven (7) five-point composite confirmation sidewall sample locations were collected for laboratory analysis during remedial activities. Confirmation floor sample locations were labeled with "FS"-#. Confirmation sidewall sample locations were labeled with the cardinal direction (N, E, S, W) followed by SW-#. As requested by the NMOCD in the remediation plan approval, additional 5-point composite confirmation sidewall samples were collected from the vertical faces of the benched excavation and labeled with "ISW"-#.

Initial confirmation soil sampling analytical results associated with locations FS-4 and ISW-1 exceeded the TPH RRAL of 100 mg/kg. After the FS-4 area was deepened to 5 feet bgs and the ISW-1 area was expanded 2 feet to the west, iterative confirmation samples were collected to encompass the original sample locations that triggered removal (nomenclature defined in Table 3) post-additional excavation. Final excavated areas, depths, and representative confirmation sample locations are indicated in Figure 5.

Collected confirmation samples were placed into laboratory-provided sample containers, transferred under chain-of-custody, and analyzed within appropriate holding times by Cardinal. The soil samples were analyzed for TPH (GRO+DRO+MRO) by EPA Method 8015M, BTEX by EPA Method 8021B, and chlorides by SM4500Cl-B. The analytical results were directly compared to the established Site RRALs to demonstrate compliance.

The results of the May 2024 confirmation sampling events are summarized in Table 3. All final confirmation soil samples (floor and sidewall) were below applicable cleanup levels for chloride, TPH, and BTEX. Copies of laboratory analysis and chain-of-custody documentation are included in Appendix G.

PROPOSED RECLAMATION PLAN

Reclamation activities will take place at the Site upon facility deconstruction in accordance with 19.15.29.13 NMAC. All production equipment on pad will be removed, and the caliche material will be scraped and removed to expose the underlying material. The removed material will be replaced to the near original relative landform positions and contoured to achieve erosion control, long-term stability, and preservation of surface water flow patterns.

Soil samples will be collected to demonstrate that the reclaimed area will contain a minimum of four feet of non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg. The soil cover will include a top layer which is either the background thickness of topsoil or one foot of suitable material to establish vegetation at the Site, whichever is greater. The area will be seeded with a seed mix suitable for the area in the first favorable growing season following the reclamation activities. Site inspections will be performed periodically to assess the re-vegetation process and evaluate the Site for the presence of noxious weeds.

Restoration, reclamation, and re-vegetation will be considered complete when the reclaimed areas reach a vegetation density of greater than 70% of pre-disturbance coverage, not including invasive or noxious weeds. ConocoPhillips will submit a Re-Vegetation Closure Report to the NMOCD for final incident closure at that time.

CONCLUSION

ConocoPhillips respectfully requests closure of the incident based on the remedial activities performed in accordance with the approved remediation plan and the final confirmation sampling results. If you have any questions concerning the remediation activities performed at the Site, please call me at (512) 739-7874.

Remediation Closure Report and Reclamation Work Plan
June 14, 2024

ConocoPhillips

Sincerely,
Tetra Tech, Inc.



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



Nicholas M. Poole, G.I.T.
Project Manager

cc:
Mr. Ike Tavarez, RMR – ConocoPhillips

LIST OF ATTACHMENTS

Figures:

- Figure 1 – Overview Map
- Figure 2 – Topographic Map
- Figure 3 – Inferred Release Extent and Site Assessment (BBC)
- Figure 4 – Inferred Release Extent and Additional Assessment (Tetra Tech)
- Figure 5 – Remediation Extent and Confirmation Sampling Locations

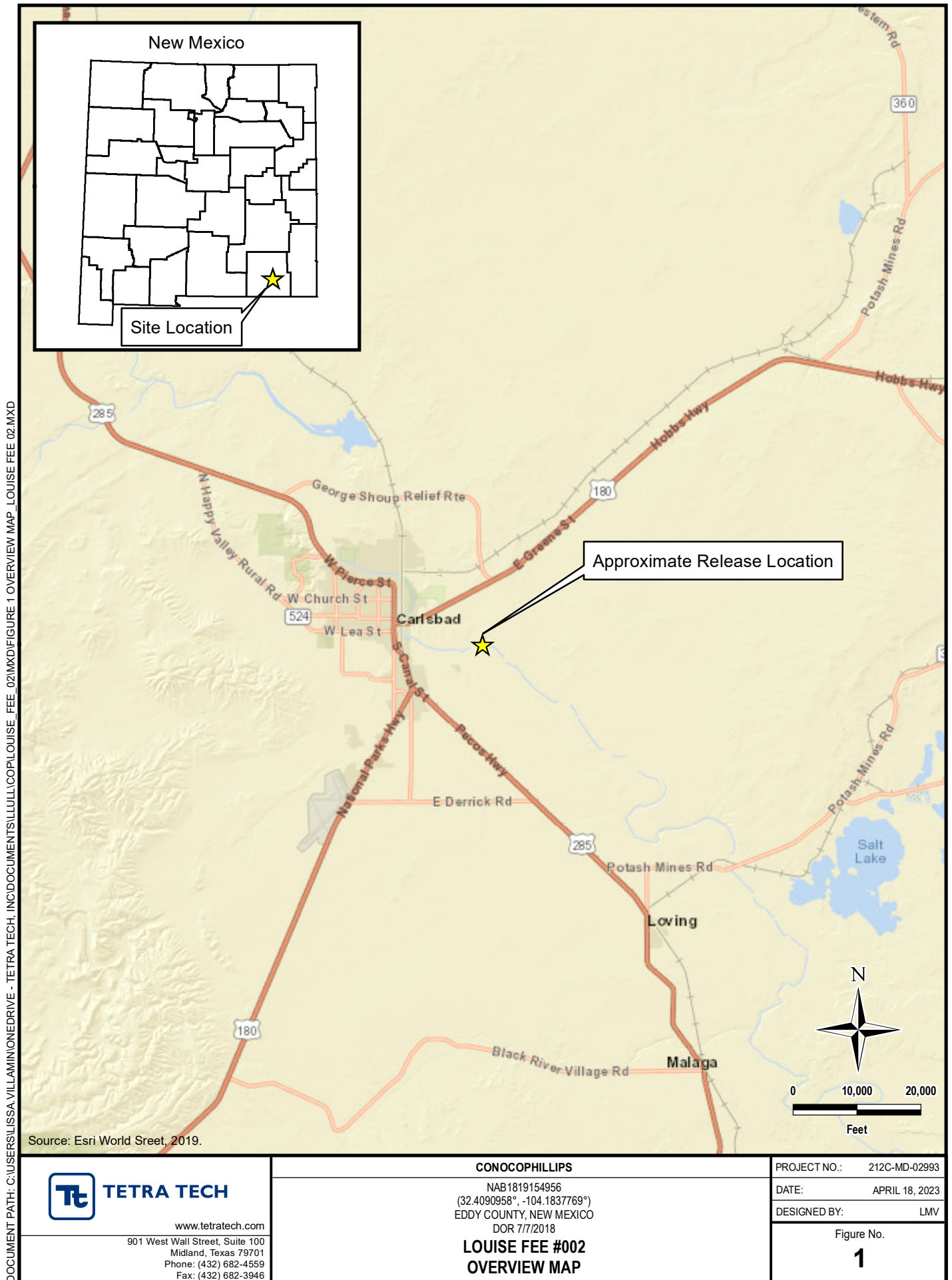
Tables:

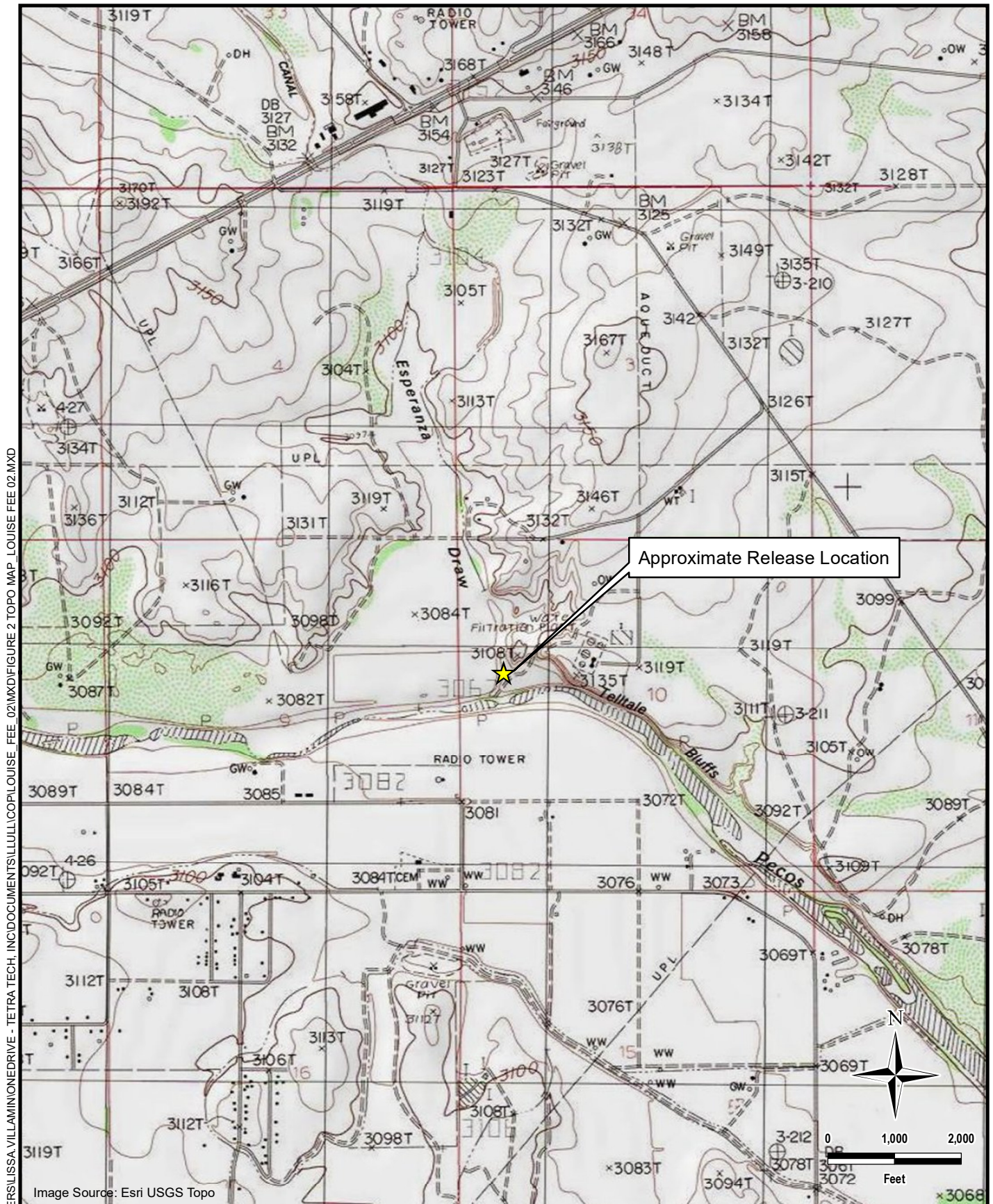
- Table 1 – Summary of Analytical Results – BBC 2019 Initial Soil Assessment
- Table 2 – Summary of Analytical Results – TT 2023 Additional Soil Assessment
- Table 3 – Summary of Analytical Results – Soil Remediation

Appendices:

- Appendix A – C-141 Forms
- Appendix B – Site Characterization Data
- Appendix C – Regulatory Correspondence
- Appendix D – Boring Log
- Appendix E – Photographic Documentation
- Appendix F – Waste Manifests
- Appendix G – Laboratory Analytical Data

FIGURES





TETRA TECH

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CONOCOPHILLIPS

NAB1819154956
(32.4090958°, -104.1837769°)
EDDY COUNTY, NEW MEXICO
DOR 7/7/2018

**LOUISE FEE #002
TOPOGRAPHIC MAP**

PROJECT NO.: 212C-MD-02993

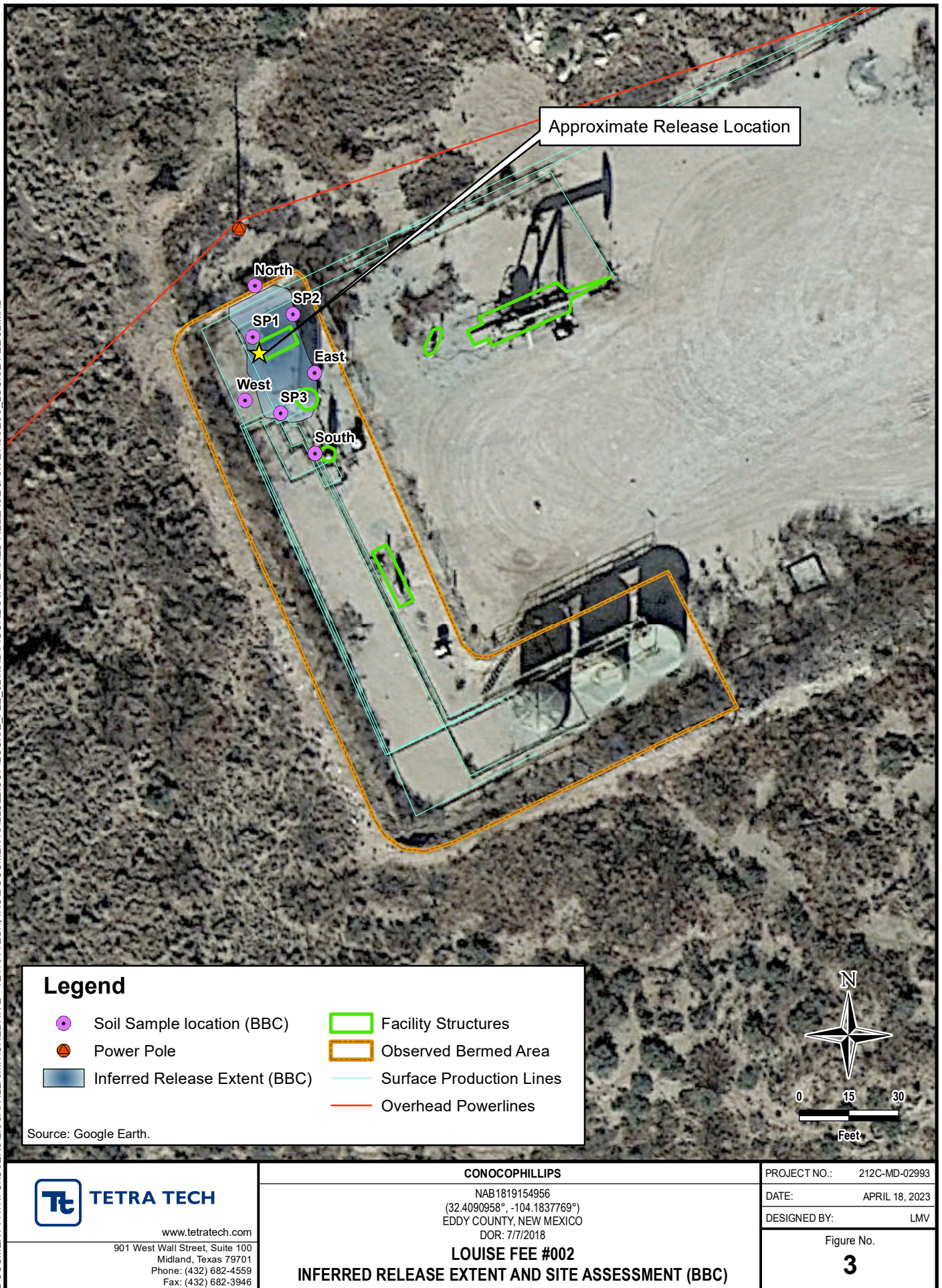
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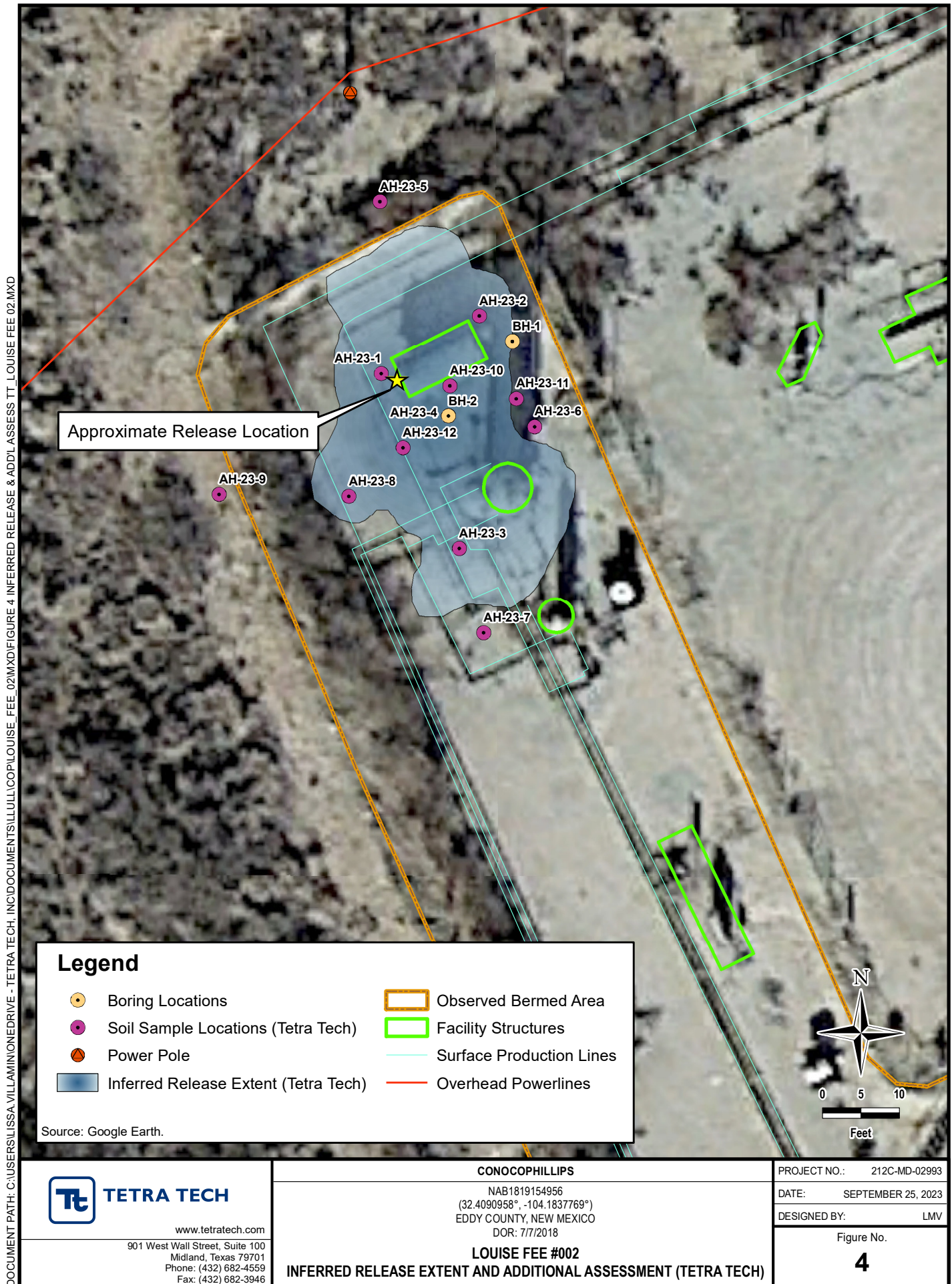
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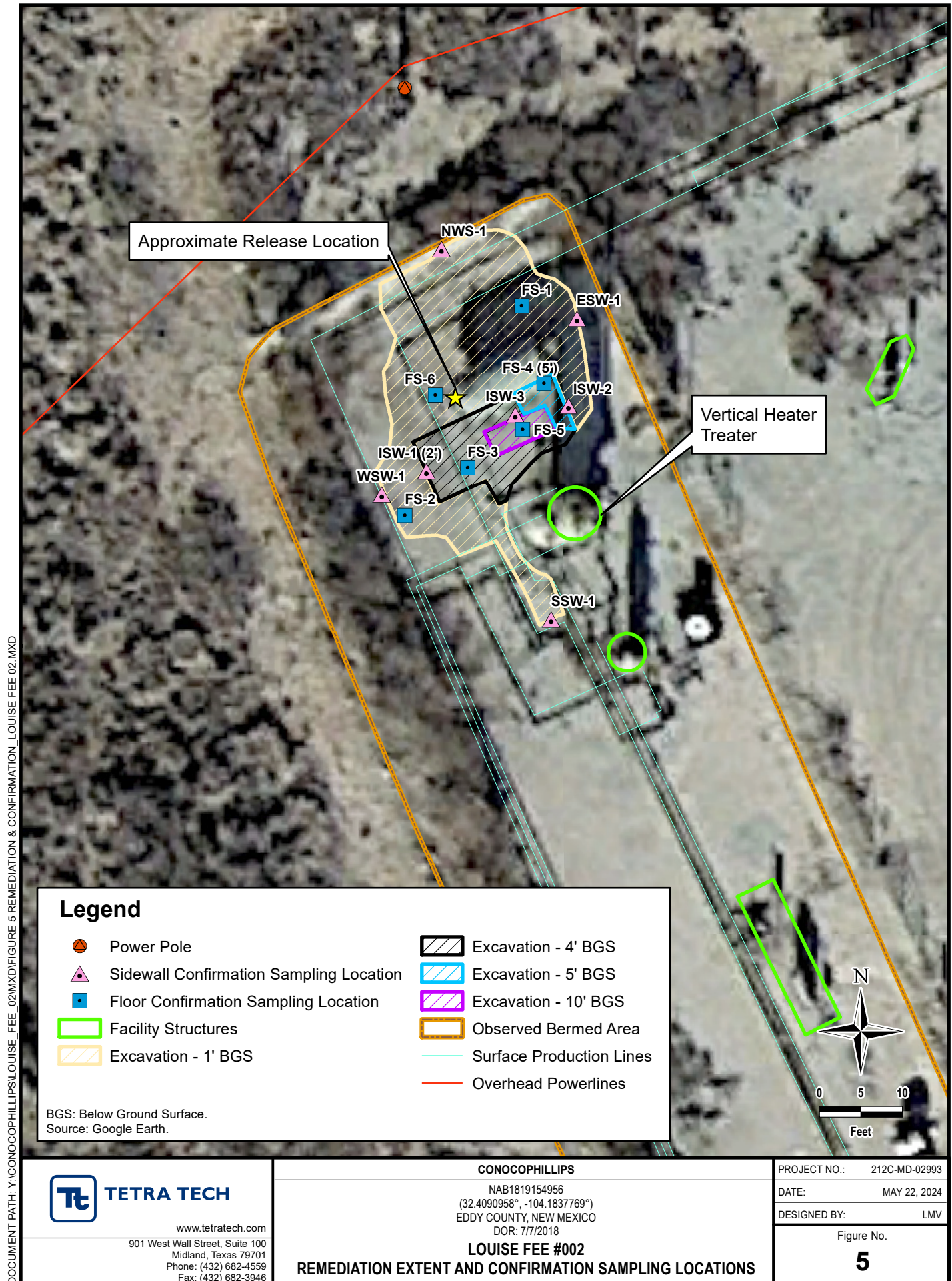
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2

DOCUMENT PATH: C:\USERS\ISSA.VILLAMONEDRIVE - TETRA TECH\INC\DOCUMENTS\ILLULL\COPILOUSE_FEE_02\MXD\FIGURE 3 INFERRED RELEASE & SITE ASSESS_LOUISE FEE 02.MXD







TABLES

TABLE 1
SUMMARY OF ANALYTICAL RESULTS
BBC 2019 SOIL ASSESSMENT- nAB1819154956
CONOCOPHILLIPS
LOUISE FEE #002
EDDY COUNTY, NEW MEXICO

Sample ID	Sample Date	Sample Depth	Chloride ¹		BTEX ²										TPH ³						
					Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO		DRO		EXT DRO		Total TPH (GRO+DRO+EXT DRO)
					mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	C ₆ - C ₁₀	Q	> C ₁₀ - C ₂₈	Q	> C ₂₈ - C ₃₆	Q	
SP-1	2/4/2019	SURFACE	16.0		<0.500		<0.500		<0.500		1.65		<3.00		942		30,200		4,500		35,642
		1	32.0		<0.500		<0.500		2.19		4.60		6.79		872		7,280		1,260		9,412
		2	32.0		<2.00		4.86		9.62		49.4		63.9		3,770		13,800		1,850		19,420
		3	32.0		<0.500		<0.500		1.19		4.71		5.90		953		7,140		1,050		9,143
	3/21/2019	4	96.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		224		119		343
		5	160		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
SP-2	2/4/2019	SURFACE	112		<0.050		0.059		0.190		1.54		1.79		39.5		2,650		592		3,282
		1	240		<0.050		0.150		0.440		2.16		2.75		690		4,060		522		5,272
		2	3,520		<0.050		1.74		4.85		21.5		28.1		756		8,690		1,200		10,646
		3	2,400		<0.500		1.18		5.16		20.4		26.7		784		6,510		931		8,225
	3/21/2019	4	80.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		202		142		344
		5	128		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
SP-3	2/4/2019	SURFACE	96.0		<0.050		0.056		0.185		1.44		1.68		18.9		1,410		368		1,797
		1	48.0		<0.500		5.14		12.4		49.9		67.4		1,790		9,880		1,230		12,900
		2	16.0		<0.050		2.43		<0.050		61.5		64.0		2,610		12,700		1,730		17,040
		3	32.0		0.075		1.93		<0.050		32.5		34.5		1,370		9,000		1,540		11,910
	3/21/2019	4	96.0		<0.050		<0.050		<0.050		0.263		<0.300		<10.0		239		158		397
		5	128		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
SP-3	2/4/2019	6	144		<0.050		<0.050		<0.050		<0.150		<10.0		<10.0		<10.0		<10.0		-
	3/21/2019																				
	3/21/2019																				
N	2/4/2019	-	122		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
E	2/4/2019	-	80.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		26.1		16.8		42.9
S	2/4/2019	-	96.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
W	2/4/2019	-	112		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		10.7		<10.0		10.7

NOTES:

ft. Feet

bgs Below ground surface

mg/kg Milligrams per kilogram

TPH Total Petroleum Hydrocarbons

GRO Gasoline range organics

DRO Diesel range organics

1 Method SM4500Cl-B

2 Method 8021B

3 Method 8015M

Bold and italicized values indicate exceedance of proposed Remediation RRALs and Reclamation Requirements.

TABLE 2
SUMMARY OF ANALYTICAL RESULTS
TT 2023 SOIL ASSESSMENT- nAB1819154956
CONOCOPHILLIPS
LOUISE FEE #002
EDDY COUNTY, NM

Sample ID	Sample Date	Sample Depth	Field Screening Results		Chloride ¹		BTEX ²										TPH ³						
			Chloride	PID			Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO		DRO		EXT DRO		Total TPH
		ft. bgs	ppm		mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	(GRO+DRO+EXT DRO)
AH-23-1	3/30/2023	0-1	-	-	16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		1,100		516		1,616
		2-3	-	-	<16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
		3-4	-	-	16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		10.2		<10.0		10.2
		4-5	-	-	32.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
AH-23-2	3/30/2023	0-1	-	-	80.0		<0.050		<0.050		<0.050		0.372		0.372		11.3		281		173		465.3
		2-3	-	-	16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
		3-4	-	-	<16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
		4-5	-	0.9	<16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
AH23-3	3/30/2023	0-1	-	-	<16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		102		79.8		181.8
		2-3	-	-	<16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		35.7		26.7		62.4
		3-4	-	-	32.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
		4-5	-	0.7	<16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
AH-23-4	3/30/2023	0-1	-	-	<16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<50.0		913		509		1,422
		2-3	-	-	32.0		<0.050		<0.050		<0.050		0.183		<0.300		99.2		6,080		1,440		7,619
		3-4	-	-	80.0		<0.050		0.451	GC-NC1	3.04	GC-NC1	19.3		22.8	GC-NC1	726		5,060		898		6,684
		4-5	-	617.5	224		<0.200		0.684	GC-NC1	3.87	GC-NC1	36.7		41.3	GC-NC1	899		5,200		924		7,023
	4/11/2023	5-6	-	-	464		<0.050		<0.050		<0.050		20.8		20.8		571		4,080		670		5,321
AH-23-5	3/30/2023	0-1	-	0.1	80.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
AH-23-6	3/30/2023	0-1	-	0.2	192		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
AH-23-7	3/30/2023	0-1	-	0.3	16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
AH-23-8	3/30/2023	0-1	-	0.2	32.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		66.7		36		102.7
AH-23-9	4/13/2023	0-1	-	-	<16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
AH-23-10	9/14/2023	1-2			944		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
		2-3			304		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
AH-23-11	9/14/2023	2-3			32.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
AH-23-12	9/14/2023	2-3			16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		136		68.4		204.4

TABLE 2
SUMMARY OF ANALYTICAL RESULTS
TT 2023 SOIL ASSESSMENT- nAB1819154956
CONOCOPHILLIPS
LOUISE FEE #002
EDDY COUNTY, NM

Sample ID	Sample Date	Sample Depth	Field Screening Results		Chloride ¹		BTEX ²										TPH ³							
							Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO		DRO		EXT DRO		Total TPH (GRO+DRO+EXT DRO)	
			C ₆ - C ₁₀														> C ₁₀ - C ₂₈		> C ₂₈ - C ₃₆					
		ft. bgs	ppm		mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	
BH-1	6/21/2023	0-1	-	-	32.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		2,310		1,150		3,460	
		2-3	-	-	16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		39.6		28.9		68.5	
		3-4	-	-	112		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		17.0		11.3		28.3	
		5-6	-	-	32.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
BH-2	9/14/2023	0-1			32.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		419		343		762	
		1-2			16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		113		111		224	
		2-3			32.0		<0.050		<0.050		0.089	GC-NC1	0.779	GC-NC1	0.868	GC-NC1	50.8		1,540		448		2,039	
		3-4			<16.0		<0.050		<0.050	GC-NC	3.56	GC-NC1	27.1	GC-NC1	30.7	GC-NC1	1,070		6,560		1,250		8,880	
		5-6			<16.0		<0.050		<0.050	GC-NC	0.367	GC-NC1	4.15	GC-NC1	4.52	GC-NC1	67.3		2,580		752		3,399	
		7-8			96.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		9-10			32.0		<0.050		<0.050		0.081	GC-NC1	0.766	GC-NC1	0.847	GC-NC1	<10.0		105		37.9		142.9	
		11-12			272		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	

NOTES:

ft. Feet
bgs Below ground surface
mg/kg Milligrams per kilogram
TPH Total Petroleum Hydrocarbons
GRO Gasoline range organics
DRO Diesel range organics
1 Method SM4500Cl-B
2 Method 8021B
3 Method 8015M

Bold and italicized values indicate exceedance of proposed RRALs.

Shaded rows indicate soil intervals proposed for excavation.

QUALIFIERS:

GC-NC1 8260 confirmation analysis was performed; initial GC results were not supported by GC/MS analysis and are biased high with interfering compounds.
GC-NC 8260 confirmation analysis was performed; initial GC results were not supported by GC/MS analysis and are reported as ND.

TABLE 3
SUMMARY OF ANALYTICAL RESULTS
SOIL REMEDIATION - nAB1819154956
CONOCOPHILLIPS
LOUISE FEE #002
EDDY COUNTY, NM

Sample ID	Sample Date	Sample Depth	Field Screening Results		Chloride ¹		BTEX ²										TPH ³							
							Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO		DRO		EXT DRO		Total TPH (GRO+DRO+EXT DRO)	
			Chloride	PID	mg/kg	Q											mg/kg	Q	mg/kg	Q	mg/kg	Q		mg/kg
			ft. bgs	ppm	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q
FS-1	5/10/2024	1	73.2	1.9	32		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
FS-2	5/10/2024	1	49.7	0	<16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
FS-3	5/10/2024	4	53.9	1.8	16		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
FS-4	5/10/2024	4	142	1.9	80		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		146		130		276	
*FS-4 (5')	5/14/2024	5	-	-	16		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
FS-5	5/10/2024	10	158	34.7	32		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
FS-6	5/14/2024	1	-	-	<16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
NSW-1	5/10/2024	-	144	3.4	32		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
SSW-1	5/10/2024	-	56.4	1.8	16		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		47.3		28.7		76	
ESW-1	5/10/2024	-	65	1.1	16		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		13.4		<10.0		13.4	
WSW-1	5/10/2024	-	119	0.6	80		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
ISW-1	5/10/2024	-	76	1.4	16		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		91.4		42.7		134.1	
*ISW-1 (2')	5/14/2024	-	-	-	32		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
ISW-2	5/10/2024	-	374	1.1	240		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
ISW-3	5/10/2024	-	62.3	1.9	16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	

NOTES:

ft. Feet
bgs Below ground surface
mg/kg Milligrams per kilogram
TPH Total Petroleum Hydrocarbons
GRO Gasoline range organics
DRO Diesel range organics
1 Method SM4500Cl-B
2 Method 8021B
3 Method 8015M

Bold and italicized values indicate exceedance of proposed Remediation RRALs and Reclamation Requirements.

Gold highlight represents soil horizons that were removed during deepening of excavation floors.

Green highlight represents soil intervals that were removed during horizontal expansion of excavation sidewalls.

* These iterative samples are located to encompass the original sample location that triggered removal, with further excavation in each area indicated in ().

QUALIFIERS:

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

JUL 09 2018

Form C-141
Revised April 3, 2017

DISTRICT II-ARTESIA OGD
Submit a copy to appropriate District Office in accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

NAB1819154956

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: COG Operating LLC (OGRID #229137)	Contact: Robert McNeill
Address: 600 West Illinois Avenue, Midland TX 79701	Telephone No. 432-683-7443
Facility Name: Louise Fee #002	Facility Type: Tank Battery
Surface Owner: Private	Mineral Owner: Private
API No. 30-015-20264	

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
E	10	22S	27E	1,980	North	760	West	Eddy

Latitude 32.4090958 Longitude -104.1837769 NAD83

NATURE OF RELEASE

Type of Release: Oil & Produced Water	Volume of Release: 6 bbl. Oil 6 bbl. Produced Water	Volume Recovered: 2 bbl. Oil 2 bbl. Produced Water
Source of Release: Hole in tubing	Date and Hour of Occurrence: July 7, 2018 10:00am	Date and Hour of Discovery: July 7, 2018 10:00am
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour:	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	
If a Watercourse was Impacted, Describe Fully.*		
Describe Cause of Problem and Remedial Action Taken.*		
The release was caused by a hole in the fire tube. The tube is being repaired.		
Describe Area Affected and Cleanup Action Taken.*		
The release was on location. A vacuum truck was dispatched to remove all freestanding fluids. Concho will have the spill area sampled to delineate any possible impact from the release and we will present a remediation work plan to the NMOCD for approval prior to any significant 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 NMOCD 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 NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD 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.		
Signature: <i>DeAnn Grant</i>	OIL CONSERVATION DIVISION	
Printed Name: DeAnn Grant	Approved by Environmental Specialist: <i>[Signature]</i>	
Title: HSE Administrative Assistant	Approval Date: 7/9/18	Expiration Date: N/A
E-mail Address: agrant@concho.com	Conditions of Approval: <i>See attached</i>	Attached <i>7/11/18</i> <i>4847</i>
Date: July 9, 2018	Phone: 432-253-4513	

* Attach Additional Sheets If Necessary

Operator/Responsible Party,

The OCD has received the form C-141 you provided on 7/9/2018 regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 28P-4847 has been assigned. **Please refer to this case number in all future correspondence.**

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

The responsible person shall complete division-approved corrective action for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC. [emphasis added]

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. **As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District 2 office in ARTESIA on or before 8/9/2018. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.**

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

- Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.
- Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.
- Nominal detection limits for field and laboratory analyses must be provided.
- Composite sampling is not generally allowed.
- Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

- Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.

- If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.

- Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.

Jim Griswold

OCD Environmental Bureau Chief
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
505-476-3465
jim.griswold@state.nm.us

Bratcher, Mike, EMNRD

From: DeAnn Grant <agrant@concho.com>
Sent: Monday, July 9, 2018 10:22 AM
To: Bratcher, Mike, EMNRD
Cc: Weaver, Crystal, EMNRD; Sheldon Hitchcock; Dakota Neel; Rebecca Haskell; DeAnn Grant
Subject: (C-141 Initial) Louise Fee #002 (30-015-20264) 07-07-2018
Attachments: (C-141 Initial) Louise Fee #002 (30-015-20264) 07-07-2018.pdf

Mr. Bratcher,

Please find the attached Initial C-141 for your consideration. If you have any questions or concerns please contact me.

Thank you,

DeAnn Grant

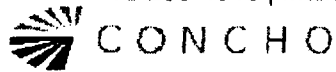
HSE Administrative Assistant

agrant@concho.com

COG Operating LLC

600 W Illinois Avenue | Midland, TX 79701

Direct: 432-253-4513 | Main: 432.683.7443



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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.

State of New Mexico
Oil Conservation Division

Page 4

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:  _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

Incident ID	
District RP	
Facility ID	
Application ID	

Remediation Plan


Remediation Plan Checklist: *Each of the following items must be included in the plan.*

- ☐ Detailed description of proposed remediation technique
- ☐ Scaled sitemap with GPS coordinates showing delineation points
- ☐ Estimated volume of material to be remediated
- ☐ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☐ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- ☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- ☐ Extents of contamination must be fully delineated.
- ☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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:  _____ Date: _____
email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: _____ Date: _____

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:  _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

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: _____ 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																	
		Sub-	Q Q Q										Depth Depth Water				
POD Number	Code	basin	County	64	16	4	Sec	Tws	Rng	X	Y	Distance	Well	Water	Column		
C 00160		C	ED	2	3	3	10	22S	27E	576826	3585355*		724	85	40	45	
C 00160 CLW198701	O	C	ED	2	3	3	10	22S	27E	576826	3585355*		724				
C 00589		CUB	ED	2	4	4	04	22S	27E	576412	3586974*		961				
C 00021 A		CUB	ED	4	4	4	09	22S	27E	576421	3585150*		983	196	40	156	
C 00021 CLW193276	O	CUB	ED	4	4	4	09	22S	27E	576421	3585150*		983	100			
C 00479		C	ED				3	03	22S	27E	576919	3587082*		1020	200		
C 00744		CUB	ED	3	3	4	10	22S	27E	577437	3585166*		1137	175			
C 02374		C	ED		3	4	09	22S	27E	575916	3585247*		1177	54	15	39	
C 02379		C	ED		3	4	09	22S	27E	575916	3585247*		1177	55	20	35	
C 03029		C	ED		3	4	09	22S	27E	575916	3585247*		1177	45	18	27	
C 00092 A	O	CUB	ED	1	3	4	09	22S	27E	575815	3585346*		1188	200			
C 02899		C	ED	1	3	4	09	22S	27E	575815	3585346*		1188	33	22	11	
C 03038		C	ED	1	3	4	09	22S	27E	575815	3585346*		1188	43	15	28	

Average Depth to Water: **24 feet**

Minimum Depth: **15 feet**

Maximum Depth: **40 feet**

Record Count: 13

UTMNA83 Radius Search (in meters):

Easting (X): 576753.47

Northing (Y): 3586075.37

Radius: 1200

*UTM location was derived from PLSS - see Help

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.

4/21/23 8:49 AM

Page 1 of 1

WATER COLUMN/ AVERAGE
DEPTH TO WATER

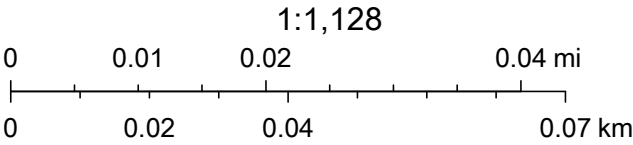
OCD Potential Karst Map



1/27/2023, 12:59:44 PM

Karst Occurrence Potential

Medium



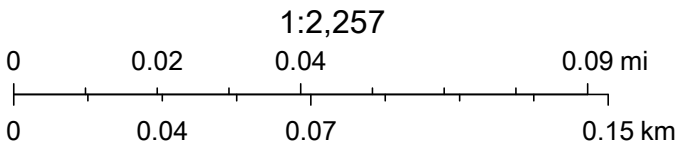
BLM, OCD, New Mexico Tech, Maxar, Microsoft, Esri, HERE, Garmin, iPC

OCD Waterbodies Map



1/27/2023, 1:51:30 PM

- OSW Water Bodys
- OSE Streams



Maxar, Microsoft, Esri, HERE, Garmin, iPC, NM OSE

OCD - Ownership



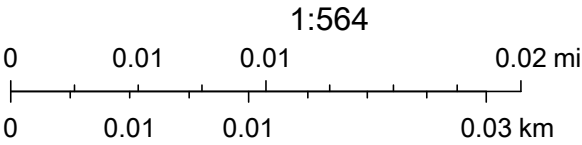
10/3/2023, 9:32:10 AM

Mineral Ownership

N-No minerals are owned by the U.S.

Land Ownership

P



U.S. BLM, Maxar, Microsoft, Esri, HERE, Garmin, iPC

National Flood Hazard Layer FIRMMette



104°11'20"W 32°24'48"N



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

1:6,000

104°10'43"W 32°24'18"N

Released to Imaging: 6/17/2024 10:32:03 AM

Basemap Imagery Source: USGS National Map 2023

Legend

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

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
		Area of Undetermined Flood Hazard Zone D
GENERAL STRUCTURES		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
		17.5 Cross Sections with 1% Annual Chance Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
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 10/3/2023 at 10:51 AM 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.

APPENDIX C

Regulatory Correspondence

Chavira, Lisbeth

From: OCDOnline@state.nm.us
Sent: Wednesday, November 30, 2022 10:22 AM
To: Beauvais, Charles R
Subject: [EXTERNAL]The Oil Conservation Division (OCD) has rejected the application, Application ID: 162460

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern (c/o Charles Beauvais for COG OPERATING LLC),

The OCD has rejected the submitted *Internal Manual Incident File Supporting Documentation (ENV)* (IM-BNF), for incident ID (n#) nAB1819154956, for the following reasons:

- **Workplan and deferral request denied. Due to the shallow depth of groundwater, the site being located in a floodplain, and it's close proximity to the Pecos River: a deferral of the release could cause an imminent risk to human health, the environment, or ground water.**
- **2RP-4847 closed. Please refer to incident #NAB1819154956 for all future communication.**
- **Please submit a complete report through the OCD Permitting website by 3/3/2023.**

The rejected IM-BNF can be found in the OCD Online: Permitting - Action Status, under the Application ID: 162460.

Please review and make the required correction(s) prior to resubmitting.

If you have any questions why this application was rejected or believe it was rejected in error, please contact me prior to submitting an additional IM-BNF.



Thank you,
Brittany Hall
Projects Environmental Specialist - A
505-517-5333
Brittany.Hall@emnrd.nm.gov

New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505

Poole, Nicholas

From: Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>
Sent: Tuesday, February 28, 2023 9:39 AM
To: Abbott, Sam
Cc: Llull, Christian; Beauvais, Charles R
Subject: RE: [EXTERNAL] Extension Request - Application ID 162460 (Incident ID nAB1819154956)

Follow Up Flag: Follow up
Flag Status: Flagged

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Sam,
Your extension request for **nAB1819154956** is approved. The new due date is June 1, 2023.

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.

Thank you,
Brittany Hall • Environmental Specialist
Environmental Bureau Projects Group
EMNRD - Oil Conservation Division
1000 Rio Brazos Road | Aztec, NM 87110
505.517.5333 | Brittany.Hall@emnrd.nm.gov
<http://www.emnrd.nm.gov/ocd/>

From: Abbott, Sam <Sam.Abbott@tetrattech.com>
Sent: Tuesday, February 28, 2023 7:44 AM
To: Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>
Cc: Llull, Christian <Christian.Llull@tetrattech.com>; Beauvais, Charles R <Charles.R.Beauvais@conocophillips.com>
Subject: [EXTERNAL] Extension Request - Application ID 162460 (Incident ID nAB1819154956)

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Ms. Hall:

On behalf of ConocoPhillips, Tetra Tech is requesting a 90-day extension (until June 1, 2023) to complete additional assessment activities and associated reporting for the Louise Fee #002 Release site (**nAB1819154956**).

ConocoPhillips recently received a large volume of NMOCD determinations related to unresolved releases from ConocoPhillips' predecessor-in-interest ("COG") via the *Internal Manual Incident File Supporting Documentation (ENV)* (IM-BNF) process.

Given the difficulties inherent with available resource allocation for several projects with similar deadlines within a short period of time, this extension is required to safely complete the additional assessment. ConocoPhillips plans to conduct the additional assessment in the coming month however, and once the sampling data is collected, tabulated, and evaluated, a revised report will be submitted to the OCD.

Please let me know if you have any questions or concerns.

Sam

Samantha Abbott, PG | Project Manager

Direct Mobile +1 (512) 739-7874 | Business +1 (512) 338-1667 | Sam.Abbott@tetrattech.com

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Poole, Nicholas

From: Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>
Sent: Wednesday, June 7, 2023 8:10 AM
To: Llull, Christian; Abbott, Sam
Cc: Chavira, Lisbeth
Subject: RE: [EXTERNAL] Extension Request #2 - Application ID 162460 (Incident ID nAB1819154956)

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Christian,

Thank you for the clarification. The extension for **nAB1819154956** is approved. New due date is August 30, 2023.

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.

Thank you,

Brittany Hall • Environmental Specialist
Environmental Bureau Projects Group
EMNRD - Oil Conservation Division
1000 Rio Brazos Road | Aztec, NM 87110
505.517.5333 | Brittany.Hall@emnrd.nm.gov
<http://www.emnrd.nm.gov/ocd/>

From: Llull, Christian <Christian.Llull@tetrattech.com>
Sent: Tuesday, June 6, 2023 3:40 PM
To: Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>; Abbott, Sam <Sam.Abbott@tetrattech.com>
Cc: Chavira, Lisbeth <LISBETH.CHAVIRA@tetrattech.com>
Subject: RE: [EXTERNAL] Extension Request #2 - Application ID 162460 (Incident ID nAB1819154956)

Apologies Brittany.

The original Louise Fee Work Plan and deferral request completed by BBC was denied by OCD.
Based on the rejection, COP completed additional assessment to confirm impacts at the Louise Fee.
Figures and tables are attached for review as evidence of the additional work completed and proof of good cause.

The extent was horizontally delineated, however, vertical delineation was not achieved as the facility is congested and hand auger efforts were unsuccessful.

The risk management and remediation group at ConocoPhillips is willing to attempt to drill within the bermed facility to vertically delineate the area around AH-23-4. This additional work takes time to arrange and coordinate.
Additionally, this release is on private land. Stakeholder input is required prior to decision making processes for remedial action.

In order to guide the eventual remedial action, COP requires additional time for coordination with operations, time to discuss facility and production equipment obstructions, and the associated stakeholder engagement regarding the work.

Please let me know if this is enough information for you to consider the extension.

Christian

From: Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>
Sent: Tuesday, June 06, 2023 3:37 PM
To: Llull, Christian <Christian.Llull@tetrattech.com>; Abbott, Sam <Sam.Abbott@tetrattech.com>
Cc: Chavira, Lisbeth <LISBETH.CHAVIRA@tetrattech.com>
Subject: RE: [EXTERNAL] Extension Request #2 - Application ID 162460 (Incident ID nAB1819154956)

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Christian,

I need a little bit more information before I can grant another extension for this incident. Per 19.15.29.12 B. (2) "Any remediation under 19.15.29 NMAC should be completed as soon as practicable. Any remediation that exceeds 90 days must follow the division-approved timeline in the remediation plan. The responsible party may request an extension of time to remediate upon a showing of good cause as determined by the division."

Reviewing and evaluating the data is not enough to show good cause for an extension.

Please let me know if you have any questions.

Thank you,

Brittany Hall • Environmental Specialist
Environmental Bureau Projects Group
EMNRD - Oil Conservation Division
1000 Rio Brazos Road | Aztec, NM 87110
505.517.5333 | Brittany.Hall@emnrd.nm.gov
<http://www.emnrd.nm.gov/ocd/>

From: Llull, Christian <Christian.Llull@tetrattech.com>
Sent: Tuesday, June 6, 2023 9:04 AM
To: Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>; Abbott, Sam <Sam.Abbott@tetrattech.com>
Cc: Chavira, Lisbeth <LISBETH.CHAVIRA@tetrattech.com>
Subject: [EXTERNAL] Extension Request #2 - Application ID 162460 (Incident ID nAB1819154956)

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Ms. Hall:

On behalf of ConocoPhillips, Tetra Tech is requesting an additional 90-day extension (until August 30, 2023) to complete the evaluation of the collected data and the ensuing reporting for the Louise Fee #002 Release site (**nAB1819154956**).

ConocoPhillips has safely completed the additional assessment proposed at the Site. Given the complexities of this site, including shallow groundwater in the area, the site location in a floodplain, and numerous surface and subsurface utilities within the release footprint, this incident is now being handled by the risk management and remediation group at ConocoPhillips. The collected data will be evaluated in the coming months and, after review, a revised report will be submitted to the OCD within the allotted timeframe.

Please let me know if you have any questions or concerns.

Christian

Christian Llull, P.G. | Program Manager
Mobile +1 (512) 565-0190 | christian.llull@tetrattech.com

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8911 N. Capital of Texas Highway | Bldg. 2, Suite 2310 | Austin, TX 78759 | tetrattech.com

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Poole, Nicholas

From: Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>
Sent: Tuesday, September 12, 2023 2:14 PM
To: Abbott, Sam
Cc: Tavarez, Ike; Llull, Christian; Chavira, Lisbeth
Subject: RE: [EXTERNAL] Extension Request #3 - Application ID 162460 (Incident ID nAB1819154956)

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Sam,

The extension for **nAB1819154956** is approved. New due date November 28, 2023.

Please be advised that this will be the last extension approval for this incident number.

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.

Thank you,

Brittany Hall • Environmental Specialist
Environmental Bureau Projects Group
EMNRD - Oil Conservation Division
1000 Rio Brazos Road | Aztec, NM 87110
505.517.5333 | Brittany.Hall@emnrd.nm.gov
<http://www.emnrd.nm.gov/ocd/>

From: Abbott, Sam <Sam.Abbott@tetrattech.com>
Sent: Tuesday, September 12, 2023 11:06 AM
To: Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>
Cc: Tavarez, Ike <Ike.Tavarez@conocophillips.com>; Llull, Christian <Christian.Llull@tetrattech.com>; Chavira, Lisbeth <LISBETH.CHAVIRA@tetrattech.com>
Subject: [EXTERNAL] Extension Request #3 - Application ID 162460 (Incident ID nAB1819154956)

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Ms. Hall,

On behalf of ConocoPhillips, Tetra Tech is requesting an additional 90-day extension (until November 28, 2023) to complete the additional assessment delineation and the ensuing reporting for the Louise Fee #002 Release site (nAB1819154956).

The original Louise Fee Work Plan and deferral request completed by BBC was denied by OCD. ConocoPhillips has since completed additional assessment activities to confirm impacts at the Louise Fee in accordance with the OCD rejection and the previous extension requests granted by OCD.

The extent was horizontally delineated, however, vertical delineation was not achieved as the facility is congested and hand auger efforts were unsuccessful. On behalf of the risk management and remediation group at ConocoPhillips, Tetra Tech was on-site on June 21, 2023, and planned to install one 20-foot boring (BH-1) within the release area inside the berm to complete vertical delineation of the release extent. The berm was removed to allow for drill rig access, but the

rig was unable to access the exact area of AH-23-4 due to the amount of equipment inside the battery. The boring (BH-1) was installed as close as possible to a depth of 6 feet bgs.

Figures and tables are attached for review as evidence of the additional work completed and proof of good cause. The analytical results associated with the additional sampling indicate that the location of BH-1 was not adequate for achieving vertical delineation of the release.

This release is on private land, and stakeholder input is required prior to decision making processes for remedial action. In order to guide the eventual remedial action, ConocoPhillips has required additional time for coordination with operations, time to discuss facility and production equipment obstructions, and the associated stakeholder engagement regarding the work. Additionally, the proper equipment necessary to enter the congested area has been difficult to schedule.

Tetra Tech is scheduled to return to the site the week of September 11, 2023 to install a new boring using a track-mounted Geoprobe in the exact area of AH-23-4 to obtain vertical delineation. The collected data will be evaluated and a revised report will be submitted to the OCD within the requested timeframe.

Please let me know if you have any questions or concerns.

Thank you,
Sam

Samantha Abbott, PG | Project Manager
Direct Mobile +1 (512) 739-7874 | Business +1 (512) 338-1667 | Sam.Abbott@tetratech.com

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Abbott, Sam

From: OCDOnline@state.nm.us
Sent: Monday, November 20, 2023 4:07 PM
To: Llull, Christian
Subject: The Oil Conservation Division (OCD) has rejected the application, Application ID: 286830

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To whom it may concern (c/o Christian Llull for COG OPERATING LLC),

The OCD has rejected the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nAB1819154956, for the following reasons:

- **Variance request denied. Due to the shallow depth of groundwater, the site being located in a floodplain, and it's close proximity to the Pecos River; a variance proposed to leave contaminants in place could cause an imminent risk to human health, the environment, or groundwater. Downward migration of remaining contaminants due to infiltration of surface water is not the only mechanism that can lead to impacts to freshwater.**
- **OCD is requesting a soil boring be drilled as close as possible to the release area in order to determine an accurate depth to groundwater. If groundwater is encountered in the boring, a sample will need to be collected and analyzed. In lieu of drilling a soil boring, the area of the release will need to be remediated to the most stringent standards.**
- **Submit a complete report through the OCD Permitting website by 1/1/2023.**

The rejected C-141 can be found in the OCD Online: Permitting - Action Status, under the Application ID: 286830.

Please review and make the required correction(s) prior to resubmitting.

If you have any questions why this application was rejected or believe it was rejected in error, please contact me prior to submitting an additional C-141.

Thank you,
Brittany Hall
Projects Environmental Specialist - A
505-517-5333
Brittany.Hall@emnrd.nm.gov

New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505

From: OCDOnline@state.nm.us
To: [Lull, Christian](#)
Subject: The Oil Conservation Division (OCD) has approved the application, Application ID: 295884
Date: Tuesday, December 19, 2023 10:38:27 AM

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To whom it may concern (c/o Christian Lull for COG OPERATING LLC),

The OCD has approved the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nAB1819154956, with the following conditions:

- **Remediation plan approved. Ensure faces of the near vertical surfaces of the benched excavation are included in the 5-point composite confirmation samples.**
- **Submit a complete report through the OCD Permitting website by 4/26/2024.**

The signed C-141 can be found in the OCD Online: Imaging under the incident ID (n#).

If you have any questions regarding this application, please contact me.

Thank you,
Brittany Hall
Projects Environmental Specialist - A
505-517-5333
Brittany.Hall@emnrd.nm.gov

New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505

From: [Hall, Brittany, EMNRD](#)
To: [Abbott, Sam](#); [Enviro, OCD, EMNRD](#)
Cc: [Llull, Christian](#)
Subject: RE: [EXTERNAL] Extension Request - Louise Fee #002 Remediation (Incident ID nAB1819154956)
Date: Wednesday, May 1, 2024 8:22:45 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

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Sam,

The extension request is approved. The new due date is June 26, 2024.

Please include a copy of this email in the remediation closure report.

Thank you,

Brittany Hall ● Environmental Specialist

Environmental Bureau Projects Group

EMNRD - Oil Conservation Division

1000 Rio Brazos Road | Aztec, NM 87110

505.517.5333 | Brittany.Hall@emnrd.nm.gov

<http://www.emnrd.nm.gov/ocd/>

Please be advised that the new Digital C-141 is live as of December 1, 2023. Please review the new Digital C-141 submission Dec 1, 2023 Guidance document posted on the EMNRD Website prior to submitting any C-141s. The guidance documents can be found at <https://www.emnrd.nm.gov/ocd/ocd-announcements-and-notifications/> or <https://www.emnrd.nm.gov/ocd/ocd-forms/>.

From: Abbott, Sam <Sam.Abbott@tetrattech.com>

Sent: Tuesday, April 30, 2024 3:04 PM

To: Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>

Cc: Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>; Llull, Christian <Christian.Llull@tetrattech.com>

Subject: [EXTERNAL] Extension Request - Louise Fee #002 Remediation (Incident ID nAB1819154956)

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To Whom it May Concern,

On behalf of ConocoPhillips, Tetra Tech is requesting a 60-day extension (until June 26, 2024) to complete remedial activities and associated reporting for the **Louise Fee #002 Release**

(NAB1819154956).

The remediation action plan was approved on December 19, 2023. The remedial action area is located within an active facility with limited access, and commencement of the approved action was delayed to coordinate the removal of onsite equipment and to temporarily shut in the facility. These safety mitigation measures have now been completed.

The Notification of Final Sampling of a Release (C-141N) was submitted to the NMOCD on April 25, 2024. On April 29, 2024, Tetra Tech personnel were on site to perform the remedial activities. An unforeseen additional safety concern was identified which restricted site access and resulted in a delay of the scheduled remedial activities by approximately one week. The issue is currently being addressed, and a revised Notification of Final Sampling of a Release (C-141N) will be submitted when the revised schedule is confirmed.

A complete report will be submitted to the NMOCD within the requested timeframe.

Thank you in advance.

Sam

Samantha Abbott, PG | Project Manager

Direct Mobile +1 (512) 739-7874 | Business +1 (512) 338-1667 | Sam.Abbott@tetrattech.com

Tetra Tech, Inc. | *Leading with Science*® | OGA

8911 N Capital of Texas Hwy #2310 | Austin, TX 78759 | tetrattech.com

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From: OCDOnline@state.nm.us
To: [Lull, Christian](#)
Subject: The Oil Conservation Division (OCD) has accepted the application, Application ID: 342459
Date: Thursday, May 9, 2024 10:13:38 AM

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

To whom it may concern (c/o Christian LLuLL for COG OPERATING LLC),

The OCD has received the submitted *Notification for (Final) Sampling of a Release* (C-141N), for incident ID (n#) nAB1819154956.

The sampling event is expected to take place:

When: 05/10/2024 @ 12:00

Where: E-10-22S-27E 1980 FNL 760 FWL (32.4090958,-104.1837769)

Additional Information: Contact Christian at 512-565-1090

Louise Fee #002

Eddy County, NM

GPS Coordinates: 32.409157°, -104.183734°

Additional Instructions: Louise Fee #002

Eddy County, NM

GPS Coordinates: 32.409157°, -104.183734°

An OCD representative may be available onsite at the date and time reported. In the absence or presence of an OCD representative, sampling pursuant to 19.15.29.12.D NMAC is required. Sampling must be performed following an approved sampling plan or pursuant to 19.15.29.12.D.(1).(c) NMAC. Should there be a change in the scheduled date and time of the sampling event, then another notification should be resubmitted through OCD permitting as soon as possible.

- **Failure to notify the OCD of sampling events including any changes in date/time per the requirements of 19.15.29.12.D.(1).(a) NMAC, may result in the remediation closure samples not being accepted.**

If you have any questions regarding this application, or don't know why you have received this email, please contact us.

New Mexico Energy, Minerals and Natural Resources Department

1220 South St. Francis Drive

Santa Fe, NM 87505

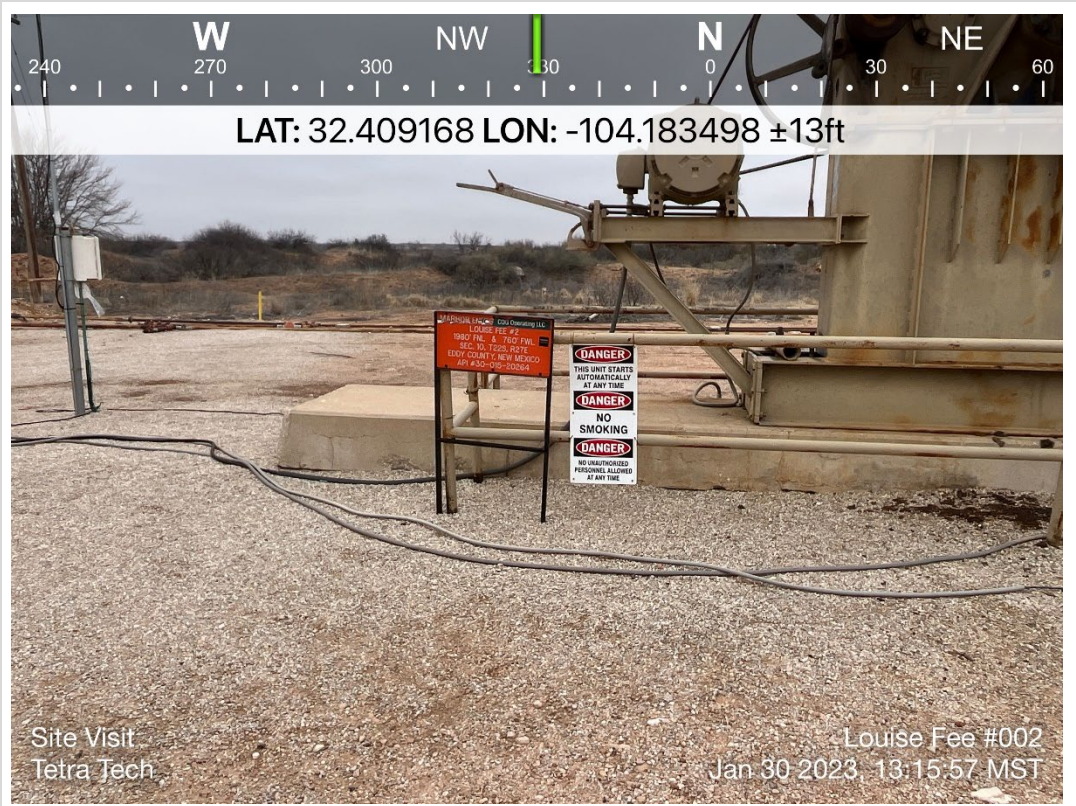
APPENDIX D

Boring Log

212C-MD-02993		TETRA TECH		LOG OF BORING BH-2				Page 1 of 1			
Project Name: Louise Fee #002 Battery Release											
Borehole LocationGPS Coordinates: 32.409144°, -104.183712°				Surface Elevation: 3081 ft							
Borehole Number: BH-2				Borehole Diameter (in.): 8		Date Started: 9/14/2023		Date Finished: 9/14/2023			
WATER LEVEL OBSERVATIONS											
While Drilling				▽ DRY ft		Upon Completion of Drilling				▽ DRY ft	
Remarks:											
MATERIAL DESCRIPTION											
DEPTH (ft)											
REMARKS											
-SM- SAND: Brown, moist, with very strong hydrocarbon odor and visible hydrocarbon staining											
-SM- SAND: Light brown, slightly moist, with strong hydrocarbon odor and minor visible hydrocarbon staining											
-SM- SAND: Dark brown, slightly moist, with strong hydrocarbon odor and visible hydrocarbon staining											
-SM- SAND: Dark brown, moist, with some caliche fragments, strong hydrocarbon odor and visible hydrocarbon staining											
-SC- CLAYEY SAND: Dark brown, moist, with very strong hydrocarbon odor and visible hydrocarbon staining											
-SC- CLAYEY SAND: Dark brown, moist, with strong hydrocarbon odor and visible hydrocarbon staining											
-SM- SAND: Dark brown, slightly moist, some weak cementation, with some hydrocarbon odor and visible light hydrocarbon staining											
-SC- CLAYEY SAND: Dark brown, slightly moist to moist, with strong hydrocarbon odor and visible hydrocarbon staining											
-SM- SAND: Light brown, slightly moist, some weak cementation, trace gravel, with minor hydrocarbon odor and minor visible hydrocarbon staining											
-SC- CLAYEY SAND: Brown to dark brown, moist, with minor hydrocarbon odor and minor visible hydrocarbon staining											
-SC- CLAYEY SAND: Brown to dark brown, moist, trace gravel											
-SM- SAND: Light brown, slightly moist, moderately cemented											
-CL- SANDY CLAY: Dark brown, stiff, slightly moist											
Bottom of borehole at 17.0 feet.											
Sampler Types: Split Spoon, Shelby, Bulk Sample, Grab Sample, Acetate Liner, Vane Shear, Discrete Sample, Test Pit											
Operation Types: Mud Rotary, Continuous Flight Auger, Wash Rotary, Hand Auger, Air Rotary, Direct Push, Core Barrel											
Notes: Surface elevation is an approximate value obtained from Google Earth data.											
Logger: Colton Bickerstaff											
Drilling Equipment: Geoprobe											
Driller: Talon LPE											

APPENDIX E

Photographic Documentation



TETRA TECH, INC. PROJECT NO. 212C-MD-02993	DESCRIPTION	View of site signage. Louise Fee #2 and location information.	1
	SITE NAME	Louise Fee #002 Release	1/30/2023



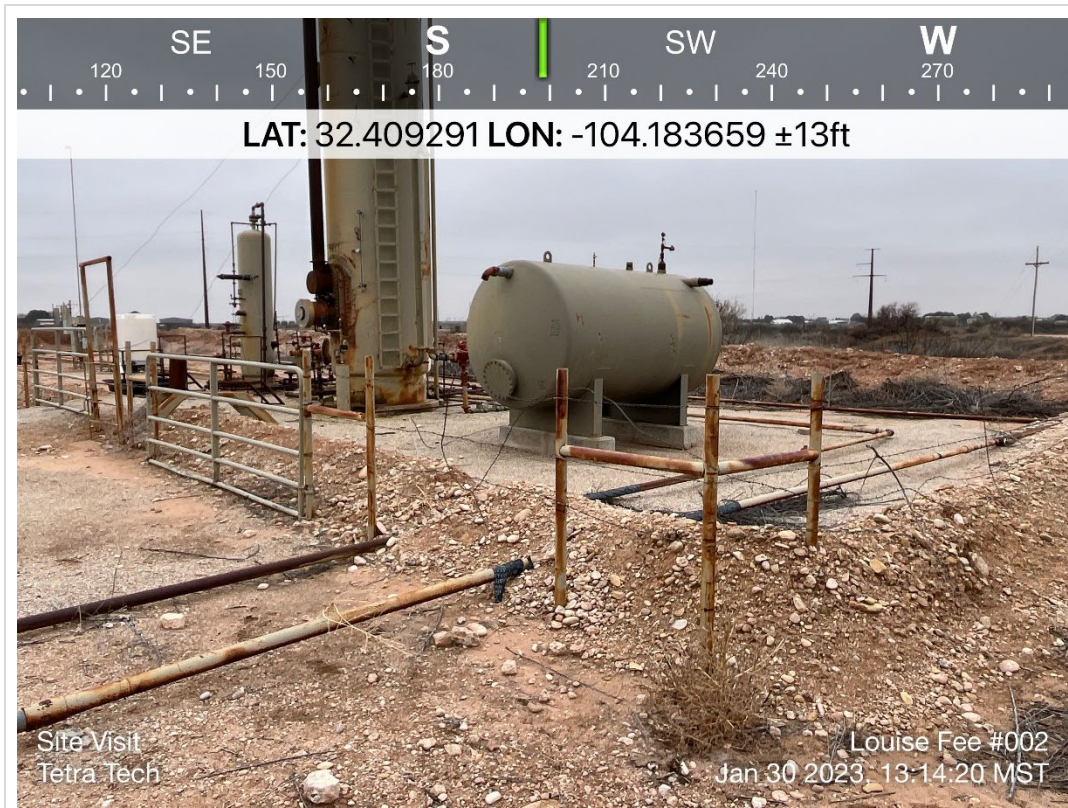
TETRA TECH, INC. PROJECT NO. 212C-MD-02993	DESCRIPTION	View east southeast towards pad. Surface steel lines and production equipment present.	2
	SITE NAME	Louise Fee #002 Release	1/30/2023



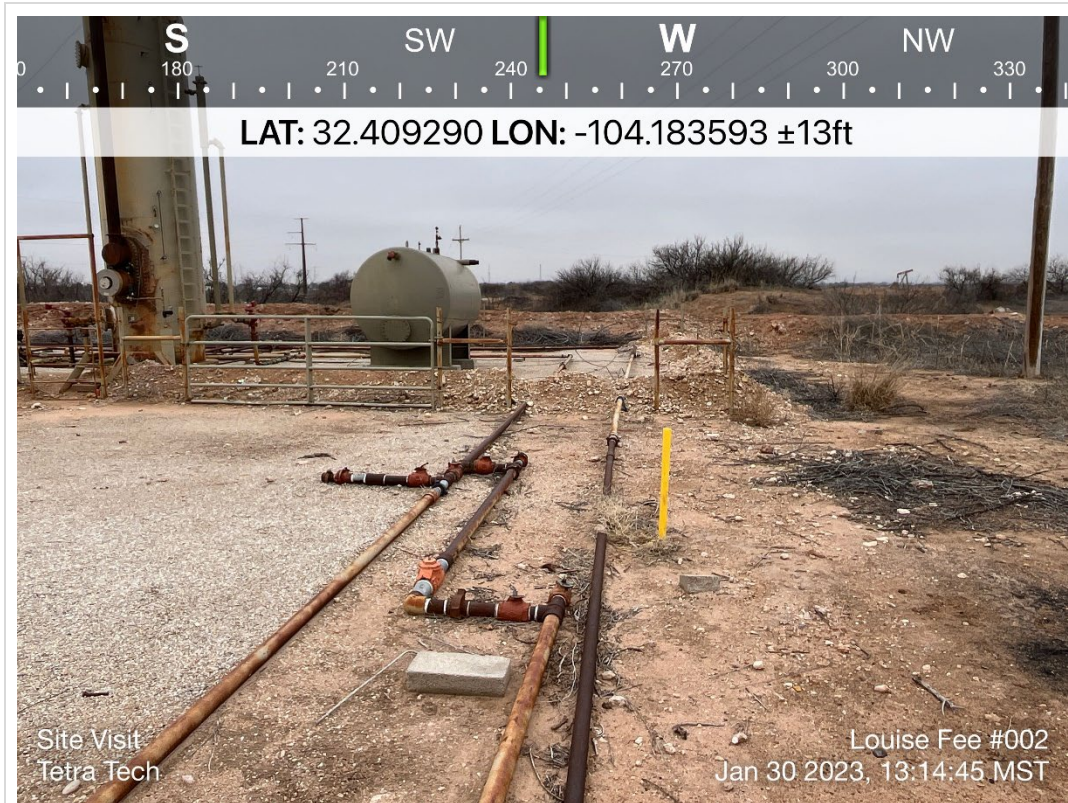
TETRA TECH, INC. PROJECT NO. 212C-MD-02993	DESCRIPTION	View southeast. Surface steel lines and production equipment present.	3
	SITE NAME	Louise Fee #002 Release	1/30/2023



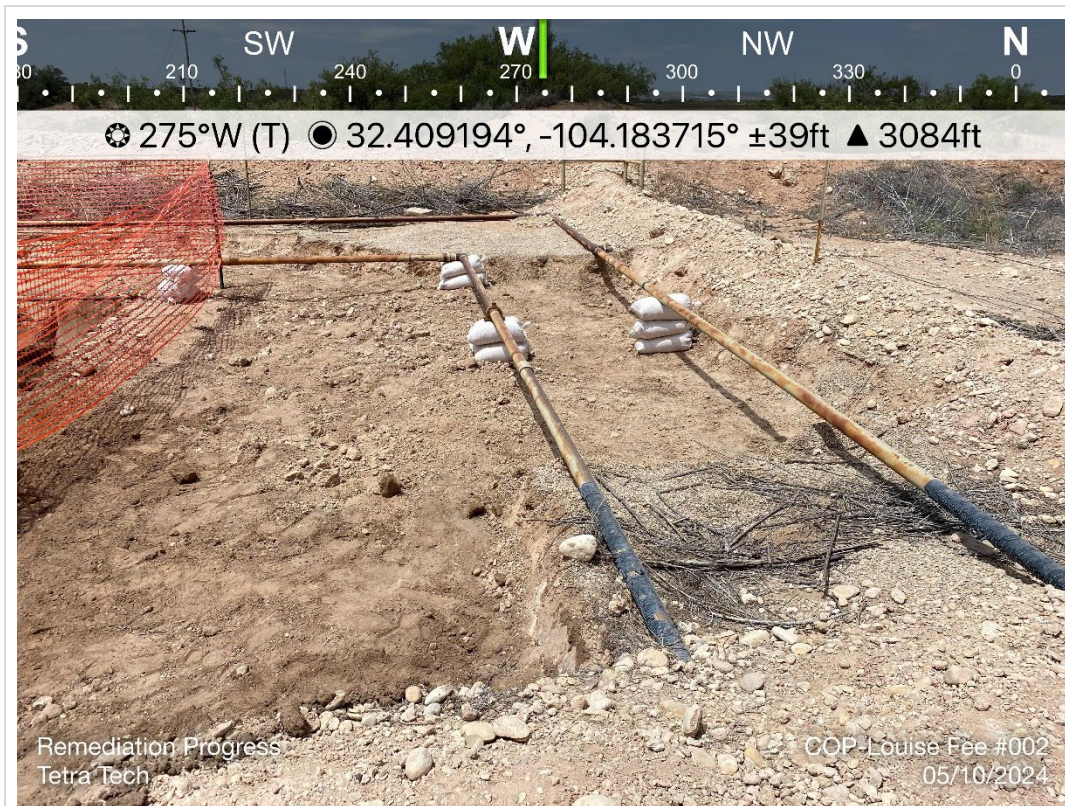
TETRA TECH, INC. PROJECT NO. 212C-MD-02993	DESCRIPTION	View west northwest. Surface steel lines and production equipment present.	4
	SITE NAME	Louise Fee #002 Release	1/30/2023



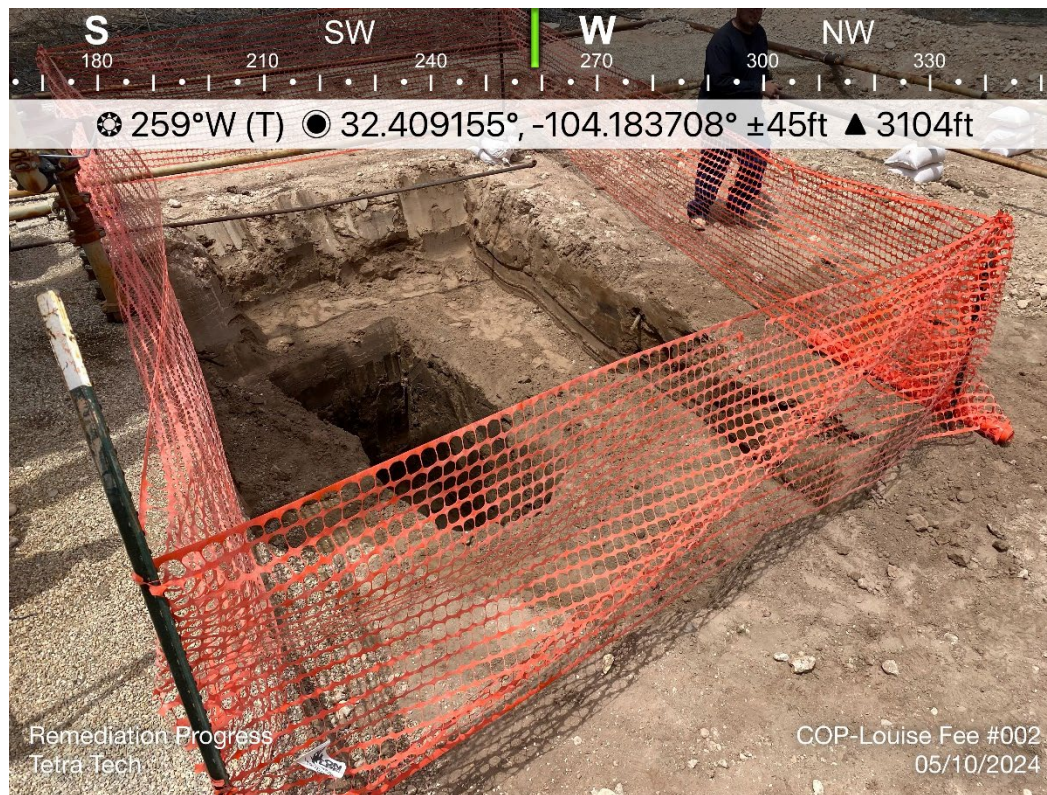
TETRA TECH, INC. PROJECT NO. 212C-MD-02993	DESCRIPTION	View south-southwest of gated and fenced area. Surface steel lines and production equipment present.	5
	SITE NAME	Louise Fee #002 Release	1/30/2023



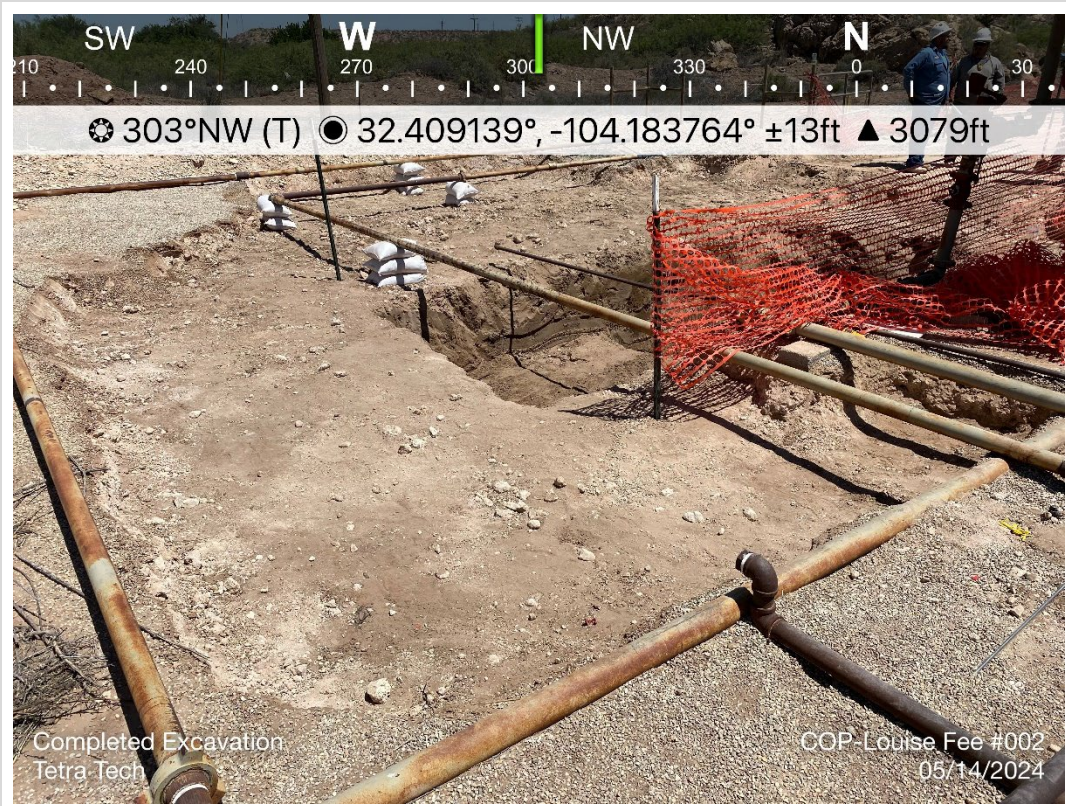
TETRA TECH, INC. PROJECT NO. 212C-MD-02993	DESCRIPTION	View west-southwest. Surface steel lines and production equipment present.	6
	SITE NAME	Louise Fee #002 Release	1/30/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-02993	DESCRIPTION	View west. Remediation progress on north side of release area.	7
	SITE NAME	Louise Fee #002 Release	5/10/2024



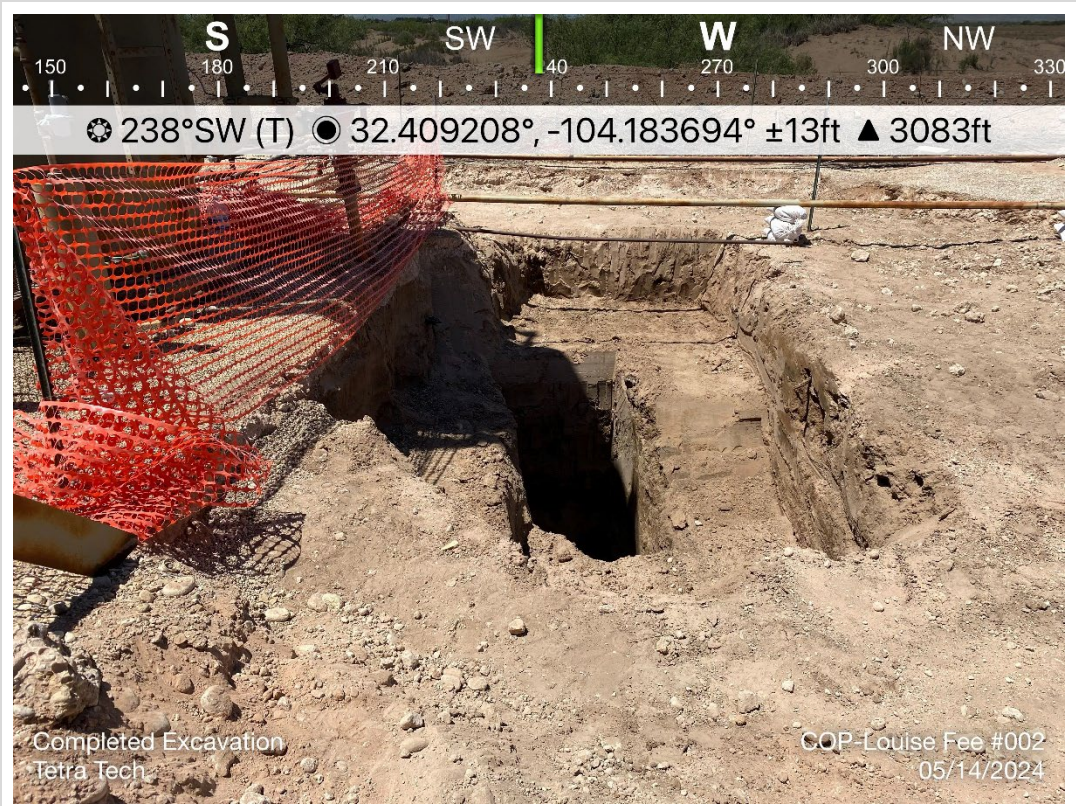
TETRA TECH, INC. PROJECT NO. 212C-MD-02993	DESCRIPTION	View west. Remediation progress in central benched excavation area.	8
	SITE NAME	Louise Fee #002 Release	5/10/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-02993	DESCRIPTION	View northwest. Completed excavation area in vicinity of FS-2.	9
	SITE NAME	Louise Fee #002 Release	5/14/2024



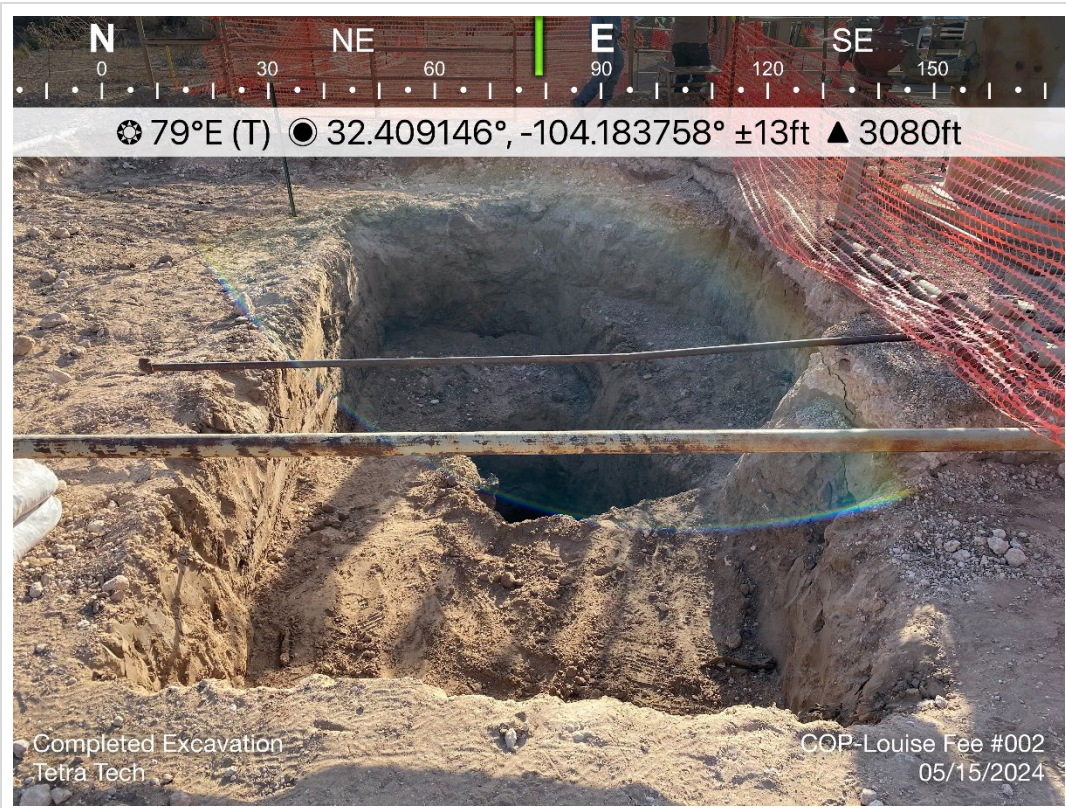
TETRA TECH, INC. PROJECT NO. 212C-MD-02993	DESCRIPTION	View east northeast. Completed excavation area in vicinity of NSW-1.	10
	SITE NAME	Louise Fee #002 Release	5/14/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-02993	DESCRIPTION	View southwest. Central benched excavation area.	11
	SITE NAME	Louise Fee #002 Release	5/14/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-02993	DESCRIPTION	View southeast. Completed excavation in expansion area ISW-1 (2').	12
	SITE NAME	Louise Fee #002 Release	5/15/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-02993	DESCRIPTION	View east. Completed excavation in expansion area FS-4 (5').	13
	SITE NAME	Louise Fee #002 Release	5/15/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-02993	DESCRIPTION	View north. Backfilled area.	14
	SITE NAME	Louise Fee #002 Release	5/16/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-02993	DESCRIPTION	View north. Backfilled area.	15
	SITE NAME	Louise Fee #002 Release	5/16/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-02993	DESCRIPTION	View southeast. Backfilled area.	16
	SITE NAME	Louise Fee #002 Release	5/16/2024

APPENDIX F

Waste Manifests



Permian Basin

Customer: CONOCOPHILLIPS
Customer #: CRI2190
Ordered by: IKE TAVEREZ
AFE #:
PO #:
Manifest #: 1
Manif. Date: 5/15/2024
Hauler: MCNABB PARTNERS
Driver: JOSH
Truck #: M87
Card #
Job Ref #

Ticket #: 700-1565627
Bid #: O6UJ9A000JEC
Date: 5/15/2024
Generator: CONOCOPHILLIPS
Generator #: 40946
Well Ser. #: 20264
Well Name: LOUISE FEE
Well #: 002
Field:
Field #:
Rig: NON-DRILLING
County: EDDY (NM)

Facility: CRI

Product / Service	Quantity Units
-------------------	----------------

Contaminated Soil (RCRA Exempt)	20.00 yards
---------------------------------	------------------------

18

Generator Certification Statement of Waste Status

I hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination, the above described waste is:

☒ RCRA Exempt: Oil Field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste
☐ RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24 or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items):
☐ MSDS Information ☐ RCRA Hazardous Waste Analysis ☐ Process Knowledge ☐ Other (Provide description above)

Driver/ Agent Signature**R360 Representative Signature****Customer Approval****THIS IS NOT AN INVOICE!**

Approved By: _____

Date: _____



Permian Basin

Customer: CONOCOPHILLIPS
Customer #: CRI2190
Ordered by: IKE TAVAREZ
AFE #:
PO #:
Manifest #: 2
Manif. Date: 5/15/2024
Hauler: MCNABB PARTNERS
Driver: JOSH
Truck #: M87
Card #
Job Ref #

Ticket #: 700-1565680
Bid #: O6UJ9A000JEC
Date: 5/15/2024
Generator: CONOCOPHILLIPS
Generator #: 40946
Well Ser. #: 20264
Well Name: LOUISE FEE
Well #: 002
Field:
Field #:
Rig: NON-DRILLING
County: EDDY (NM)

Facility: CRI

Product / Service	Quantity Units
Contaminated Soil (RCRA Exempt)	18.00 yards

Generator Certification Statement of Waste Status

I hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination, the above described waste is:

☒ RCRA Exempt: Oil Field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste
☐ RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24 or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items):
☐ MSDS Information ☐ RCRA Hazardous Waste Analysis ☐ Process Knowledge ☐ Other (Provide description above)

Driver/ Agent Signature**R360 Representative Signature****Customer Approval****THIS IS NOT AN INVOICE!**

Approved By: _____

Date: _____



Permian Basin

Customer: CONOCOPHILLIPS
Customer #: CRI2190
Ordered by: IKE TAVAREZ
AFE #:
PO #:
Manifest #: 3
Manif. Date: 5/15/2024
Hauler: MCNABB PARTNERS
Driver: JOSH
Truck #: M87
Card #
Job Ref #

Ticket #: 700-1565734
Bid #: O6UJ9A000JEC
Date: 5/15/2024
Generator: CONOCOPHILLIPS
Generator #: 40946
Well Ser. #: 20264
Well Name: LOUISE FEE
Well #: 002
Field:
Field #:
Rig: NON-DRILLING
County: EDDY (NM)

Facility: CRI

Product / Service	Quantity Units
Contaminated Soil (RCRA Exempt)	18.00 yards

Generator Certification Statement of Waste Status

I hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination, the above described waste is:

☒ RCRA Exempt: Oil Field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste
☐ RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24 or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items):
☐ MSDS Information ☐ RCRA Hazardous Waste Analysis ☐ Process Knowledge ☐ Other (Provide description above)

Driver/ Agent Signature

R360 Representative Signature

Customer Approval

THIS IS NOT AN INVOICE!

Approved By: _____

Date: _____



Permian Basin

Customer: CONOCOPHILLIPS
Customer #: CRI2190
Ordered by: IKE TAVAREZ
AFE #:
PO #:
Manifest #: 4
Manif. Date: 5/15/2024
Hauler: MCNABB PARTNERS
Driver: JOSH
Truck #: M87
Card #
Job Ref #

Ticket #: 700-1565791
Bid #: O6UJ9A000JEC
Date: 5/15/2024
Generator: CONOCOPHILLIPS
Generator #: 40946
Well Ser. #: 20264
Well Name: LOUISE FEE
Well #: 002
Field:
Field #:
Rig: NON-DRILLING
County: EDDY (NM)

Facility: CRI

Product / Service**Quantity Units**

Contaminated Soil (RCRA Exempt)

16.00 yards

Generator Certification Statement of Waste Status

I hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination, the above described waste is:

☒ RCRA Exempt: Oil Field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste
☐ RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24 or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items):
☐ MSDS Information ☐ RCRA Hazardous Waste Analysis ☐ Process Knowledge ☐ Other (Provide description above)

Driver/ Agent Signature**R360 Representative Signature****Customer Approval****THIS IS NOT AN INVOICE!**

Approved By: _____

Date: _____

APPENDIX G

Laboratory Analytical Data



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

May 13, 2024

CHRISTIAN LLULL

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: LOUISE FEE #002 BATTERY RELEASE

Enclosed are the results of analyses for samples received by the laboratory on 05/10/24 13:05.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-23-16. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive, flowing style.

Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 CHRISTIAN LLULL
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/10/2024	Sampling Date:	05/10/2024
Reported:	05/13/2024	Sampling Type:	Soil
Project Name:	LOUISE FEE #002 BATTERY RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02993A, TASK 310	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NEW MEXICO		

Sample ID: NSW - 1 (H242568-01)

BTEx 8021B			mg/kg		Analyzed By: MS				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/11/2024	ND	2.12	106	2.00	1.15	
Toluene*	<0.050	0.050	05/11/2024	ND	2.13	106	2.00	4.37	
Ethylbenzene*	<0.050	0.050	05/11/2024	ND	2.14	107	2.00	4.53	
Total Xylenes*	<0.150	0.150	05/11/2024	ND	6.94	116	6.00	3.11	
Total BTEX	<0.300	0.300	05/11/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 109 % 71.5-134

Chloride, SM4500Cl-B			mg/kg		Analyzed By: HM				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	05/13/2024	ND	416	104	400	10.9	

TPH 8015M			mg/kg		Analyzed By: MS				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/10/2024	ND	186	92.9	200	1.69	
DRO >C10-C28*	<10.0	10.0	05/10/2024	ND	177	88.6	200	0.942	
EXT DRO >C28-C36	<10.0	10.0	05/10/2024	ND					

Surrogate: 1-Chlorooctane 82.1 % 48.2-134

Surrogate: 1-Chlorooctadecane 60.8 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 CHRISTIAN LLULL
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/10/2024	Sampling Date:	05/10/2024
Reported:	05/13/2024	Sampling Type:	Soil
Project Name:	LOUISE FEE #002 BATTERY RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02993A, TASK 310	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NEW MEXICO		

Sample ID: SSW - 1 (H242568-02)

BTEx 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/11/2024	ND	2.12	106	2.00	1.15	
Toluene*	<0.050	0.050	05/11/2024	ND	2.13	106	2.00	4.37	
Ethylbenzene*	<0.050	0.050	05/11/2024	ND	2.14	107	2.00	4.53	
Total Xylenes*	<0.150	0.150	05/11/2024	ND	6.94	116	6.00	3.11	
Total BTEX	<0.300	0.300	05/11/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 108 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	05/13/2024	ND	416	104	400	10.9	

TPH 8015M	mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/10/2024	ND	186	92.9	200	1.69	
DRO >C10-C28*	47.3	10.0	05/10/2024	ND	177	88.6	200	0.942	
EXT DRO >C28-C36	28.7	10.0	05/10/2024	ND					

Surrogate: 1-Chlorooctane 93.6 % 48.2-134

Surrogate: 1-Chlorooctadecane 74.1 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 CHRISTIAN LLULL
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/10/2024	Sampling Date:	05/10/2024
Reported:	05/13/2024	Sampling Type:	Soil
Project Name:	LOUISE FEE #002 BATTERY RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02993A, TASK 310	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NEW MEXICO		

Sample ID: ESW - 1 (H242568-03)

BTEx 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/11/2024	ND	2.12	106	2.00	1.15	
Toluene*	<0.050	0.050	05/11/2024	ND	2.13	106	2.00	4.37	
Ethylbenzene*	<0.050	0.050	05/11/2024	ND	2.14	107	2.00	4.53	
Total Xylenes*	<0.150	0.150	05/11/2024	ND	6.94	116	6.00	3.11	
Total BTEx	<0.300	0.300	05/11/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 112 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	16.0	16.0	05/13/2024	ND	416	104	400	10.9		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/10/2024	ND	186	92.9	200	1.69	
DRO >C10-C28*	<10.0	10.0	05/10/2024	ND	177	88.6	200	0.942	
EXT DRO >C28-C36	<10.0	10.0	05/10/2024	ND					

Surrogate: 1-Chlorooctane 91.7 % 48.2-134

Surrogate: 1-Chlorooctadecane 77.9 % 49.1-148

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Analytical Results For:

TETRA TECH
 CHRISTIAN LLULL
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/10/2024	Sampling Date:	05/10/2024
Reported:	05/13/2024	Sampling Type:	Soil
Project Name:	LOUISE FEE #002 BATTERY RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02993A, TASK 310	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NEW MEXICO		

Sample ID: WSW - 1 (H242568-04)

BTEx 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/11/2024	ND	2.12	106	2.00	1.15	
Toluene*	<0.050	0.050	05/11/2024	ND	2.13	106	2.00	4.37	
Ethylbenzene*	<0.050	0.050	05/11/2024	ND	2.14	107	2.00	4.53	
Total Xylenes*	<0.150	0.150	05/11/2024	ND	6.94	116	6.00	3.11	
Total BTEX	<0.300	0.300	05/11/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 109 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	05/13/2024	ND	416	104	400	10.9	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/10/2024	ND	186	92.9	200	1.69	
DRO >C10-C28*	13.4	10.0	05/10/2024	ND	177	88.6	200	0.942	
EXT DRO >C28-C36	<10.0	10.0	05/10/2024	ND					

Surrogate: 1-Chlorooctane 86.7 % 48.2-134

Surrogate: 1-Chlorooctadecane 67.4 % 49.1-148

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Analytical Results For:

TETRA TECH
 CHRISTIAN LLULL
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/10/2024	Sampling Date:	05/10/2024
Reported:	05/13/2024	Sampling Type:	Soil
Project Name:	LOUISE FEE #002 BATTERY RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02993A, TASK 310	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NEW MEXICO		

Sample ID: FS - 1 (H242568-05)

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/11/2024	ND	2.12	106	2.00	1.15	
Toluene*	<0.050	0.050	05/11/2024	ND	2.13	106	2.00	4.37	
Ethylbenzene*	<0.050	0.050	05/11/2024	ND	2.14	107	2.00	4.53	
Total Xylenes*	<0.150	0.150	05/11/2024	ND	6.94	116	6.00	3.11	
Total BTEX	<0.300	0.300	05/11/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 110 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	05/13/2024	ND	416	104	400	10.9	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/10/2024	ND	186	92.9	200	1.69	
DRO >C10-C28*	<10.0	10.0	05/10/2024	ND	177	88.6	200	0.942	
EXT DRO >C28-C36	<10.0	10.0	05/10/2024	ND					

Surrogate: 1-Chlorooctane 84.7 % 48.2-134

Surrogate: 1-Chlorooctadecane 67.9 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

TETRA TECH
 CHRISTIAN LLULL
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/10/2024	Sampling Date:	05/10/2024
Reported:	05/13/2024	Sampling Type:	Soil
Project Name:	LOUISE FEE #002 BATTERY RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02993A, TASK 310	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NEW MEXICO		

Sample ID: FS - 2 (H242568-06)

BTEx 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/11/2024	ND	2.12	106	2.00	1.15	
Toluene*	<0.050	0.050	05/11/2024	ND	2.13	106	2.00	4.37	
Ethylbenzene*	<0.050	0.050	05/11/2024	ND	2.14	107	2.00	4.53	
Total Xylenes*	<0.150	0.150	05/11/2024	ND	6.94	116	6.00	3.11	
Total BTEX	<0.300	0.300	05/11/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 106 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	05/13/2024	ND	416	104	400	10.9	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/10/2024	ND	186	92.9	200	1.69	
DRO >C10-C28*	<10.0	10.0	05/10/2024	ND	177	88.6	200	0.942	
EXT DRO >C28-C36	<10.0	10.0	05/10/2024	ND					

Surrogate: 1-Chlorooctane 90.2 % 48.2-134

Surrogate: 1-Chlorooctadecane 73.0 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

TETRA TECH
 CHRISTIAN LLULL
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/10/2024	Sampling Date:	05/10/2024
Reported:	05/13/2024	Sampling Type:	Soil
Project Name:	LOUISE FEE #002 BATTERY RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02993A, TASK 310	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NEW MEXICO		

Sample ID: FS - 3 (H242568-07)

BTEX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	05/11/2024	ND	2.12	106	2.00	1.15		
Toluene*	<0.050	0.050	05/11/2024	ND	2.13	106	2.00	4.37		
Ethylbenzene*	<0.050	0.050	05/11/2024	ND	2.14	107	2.00	4.53		
Total Xylenes*	<0.150	0.150	05/11/2024	ND	6.94	116	6.00	3.11		
Total BTEX	<0.300	0.300	05/11/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 109 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	16.0	16.0	05/13/2024	ND	416	104	400	10.9		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/10/2024	ND	186	92.9	200	1.69	
DRO >C10-C28*	<10.0	10.0	05/10/2024	ND	177	88.6	200	0.942	
EXT DRO >C28-C36	<10.0	10.0	05/10/2024	ND					

Surrogate: 1-Chlorooctane 83.9 % 48.2-134

Surrogate: 1-Chlorooctadecane 69.4 % 49.1-148

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Analytical Results For:

TETRA TECH
 CHRISTIAN LLULL
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/10/2024	Sampling Date:	05/10/2024
Reported:	05/13/2024	Sampling Type:	Soil
Project Name:	LOUISE FEE #002 BATTERY RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02993A, TASK 310	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NEW MEXICO		

Sample ID: FS - 4 (H242568-08)

BTEx 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/11/2024	ND	2.12	106	2.00	1.15	
Toluene*	<0.050	0.050	05/11/2024	ND	2.13	106	2.00	4.37	
Ethylbenzene*	<0.050	0.050	05/11/2024	ND	2.14	107	2.00	4.53	
Total Xylenes*	<0.150	0.150	05/11/2024	ND	6.94	116	6.00	3.11	
Total BTEX	<0.300	0.300	05/11/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 109 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	05/13/2024	ND	448	112	400	0.00	

TPH 8015M	mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/11/2024	ND	186	92.9	200	1.69	
DRO >C10-C28*	146	10.0	05/11/2024	ND	177	88.6	200	0.942	
EXT DRO >C28-C36	130	10.0	05/11/2024	ND					

Surrogate: 1-Chlorooctane 89.5 % 48.2-134

Surrogate: 1-Chlorooctadecane 73.3 % 49.1-148

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Analytical Results For:

TETRA TECH
 CHRISTIAN LLULL
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/10/2024	Sampling Date:	05/10/2024
Reported:	05/13/2024	Sampling Type:	Soil
Project Name:	LOUISE FEE #002 BATTERY RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02993A, TASK 310	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NEW MEXICO		

Sample ID: FS - 5 (H242568-09)

BTEx 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/11/2024	ND	2.12	106	2.00	1.15	
Toluene*	<0.050	0.050	05/11/2024	ND	2.13	106	2.00	4.37	
Ethylbenzene*	<0.050	0.050	05/11/2024	ND	2.14	107	2.00	4.53	
Total Xylenes*	<0.150	0.150	05/11/2024	ND	6.94	116	6.00	3.11	
Total BTEX	<0.300	0.300	05/11/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 105 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	05/13/2024	ND	448	112	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/13/2024	ND	182	90.9	200	6.50	
DRO >C10-C28*	<10.0	10.0	05/13/2024	ND	193	96.6	200	2.57	
EXT DRO >C28-C36	<10.0	10.0	05/13/2024	ND					

Surrogate: 1-Chlorooctane 86.2 % 48.2-134

Surrogate: 1-Chlorooctadecane 84.9 % 49.1-148

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Analytical Results For:

TETRA TECH
 CHRISTIAN LLULL
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/10/2024	Sampling Date:	05/10/2024
Reported:	05/13/2024	Sampling Type:	Soil
Project Name:	LOUISE FEE #002 BATTERY RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02993A, TASK 310	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NEW MEXICO		

Sample ID: ISW - 1 (H242568-10)

BTEx 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/11/2024	ND	2.12	106	2.00	1.15	
Toluene*	<0.050	0.050	05/11/2024	ND	2.13	106	2.00	4.37	
Ethylbenzene*	<0.050	0.050	05/11/2024	ND	2.14	107	2.00	4.53	
Total Xylenes*	<0.150	0.150	05/11/2024	ND	6.94	116	6.00	3.11	
Total BTEX	<0.300	0.300	05/11/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 100 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	05/13/2024	ND	448	112	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/13/2024	ND	182	90.9	200	6.50	
DRO >C10-C28*	91.4	10.0	05/13/2024	ND	193	96.6	200	2.57	
EXT DRO >C28-C36	42.7	10.0	05/13/2024	ND					

Surrogate: 1-Chlorooctane 94.1 % 48.2-134

Surrogate: 1-Chlorooctadecane 92.3 % 49.1-148

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Analytical Results For:

TETRA TECH
 CHRISTIAN LLULL
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/10/2024	Sampling Date:	05/10/2024
Reported:	05/13/2024	Sampling Type:	Soil
Project Name:	LOUISE FEE #002 BATTERY RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02993A, TASK 310	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NEW MEXICO		

Sample ID: ISW - 2 (H242568-11)

BTX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/11/2024	ND	2.12	106	2.00	1.15	
Toluene*	<0.050	0.050	05/11/2024	ND	2.13	106	2.00	4.37	
Ethylbenzene*	<0.050	0.050	05/11/2024	ND	2.14	107	2.00	4.53	
Total Xylenes*	<0.150	0.150	05/11/2024	ND	6.94	116	6.00	3.11	
Total BTX	<0.300	0.300	05/11/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 110 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	240	16.0	05/13/2024	ND	448	112	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/13/2024	ND	182	90.9	200	6.50	
DRO >C10-C28*	<10.0	10.0	05/13/2024	ND	193	96.6	200	2.57	
EXT DRO >C28-C36	<10.0	10.0	05/13/2024	ND					

Surrogate: 1-Chlorooctane 91.6 % 48.2-134

Surrogate: 1-Chlorooctadecane 87.1 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 CHRISTIAN LLULL
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/10/2024	Sampling Date:	05/10/2024
Reported:	05/13/2024	Sampling Type:	Soil
Project Name:	LOUISE FEE #002 BATTERY RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02993A, TASK 310	Sample Received By:	Tamara Oldaker
Project Location:	EDDY COUNTY, NEW MEXICO		

Sample ID: ISW - 3 (H242568-12)

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/11/2024	ND	2.12	106	2.00	1.15	
Toluene*	<0.050	0.050	05/11/2024	ND	2.13	106	2.00	4.37	
Ethylbenzene*	<0.050	0.050	05/11/2024	ND	2.14	107	2.00	4.53	
Total Xylenes*	<0.150	0.150	05/11/2024	ND	6.94	116	6.00	3.11	
Total BTEX	<0.300	0.300	05/11/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 110 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	05/13/2024	ND	448	112	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/13/2024	ND	182	90.9	200	6.50	
DRO >C10-C28*	<10.0	10.0	05/13/2024	ND	193	96.6	200	2.57	
EXT DRO >C28-C36	<10.0	10.0	05/13/2024	ND					

Surrogate: 1-Chlorooctane 80.3 % 48.2-134

Surrogate: 1-Chlorooctadecane 76.6 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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A handwritten signature in black ink, appearing to read "Celey D. Keene".

Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: Tetra Tech Project Manager: Christian Lluil Address: 8911 Capital o Texas Hwy, Suite 2310 City: Austin State: TX Zip: 78750 Phone #: (512)565-0190 Fax #: _____ Project #: 212C-MID-02993A, Task 310 Project Owner: ConocoPhillips Project Name: Louise Fee #002 Project Location: Eddy County, New Mexico Sample Name: Colton Bickelstair Lab I.D.:				BILL TO P.O. #: _____ Company: Tetra Tech Attn: Christian Lluil Address: EMAIL City: _____ State: _____ Zip: _____ Phone #: _____ Fax #: _____				ANALYSIS REQUEST											
Matrix (G)RAB OR (C)OMP. # CONTAINERS GROUNDWATER WASTEWATER SOIL OIL SLUDGE OTHER : ACID/BASE: ICE / COOL OTHER : DATE TIME										TPH 8015M BTEX 8021B Chloride SM4500Cl-B									
Sample I.D. 1 NSW-1 C 1 X 5/10/2024 X X X 2 SSW-1 C 1 X 5/10/2024 X X X 3 ESW-1 C 1 X 5/10/2024 X X X 4 WSW-1 C 1 X 5/10/2024 X X X 5 PS-1 C 1 X 5/10/2024 X X X 6 PS-2 C 1 X 5/10/2024 X X X 7 PS-3 C 1 X 5/10/2024 X X X 8 PS-4 C 1 X 5/10/2024 X X X 9 PS-5 C 1 X 5/10/2024 X X X 10 ISW-1 C 1 X 5/10/2024 X X X 11 ISW-2 C 1 X 5/10/2024 X X X 12 ISW-3 C 1 X 5/10/2024 X X X																			
Relinquished By: Colton Bickelstair Date: 5/10/2024 Time: 1:30 PM Observed Temp. °C: 44.4 Corrected Temp. °C: _____ Sample Condition: Cool Intact Checked By: (Initials)										Relinquished By: _____ Date: _____ Time: _____ Observed Temp. °C: _____ Corrected Temp. °C: _____ Sample Condition: Cool Intact Checked By: (Initials)									
REMARKS: Turnaround Time: Standard <input type="checkbox"/> Expedited <input type="checkbox"/> Batch (only) Sample Condition: <input checked="" type="checkbox"/> Cool <input type="checkbox"/> Hot Thermometer ID: 21182140 Correction Factor: -0.02 Date: 5/10/24										REMARKS: Turnaround Time: Standard <input type="checkbox"/> Expedited <input type="checkbox"/> Batch (only) Sample Condition: <input checked="" type="checkbox"/> Cool <input type="checkbox"/> Hot Thermometer ID: 21182140 Correction Factor: -0.02 Date: 5/10/24									



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

May 15, 2024

CHRISTIAN LLULL

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: LOUISE FEE #002

Enclosed are the results of analyses for samples received by the laboratory on 05/14/24 14:00.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-23-16. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive, flowing style.

Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 CHRISTIAN LLULL
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	05/14/2024	Sampling Date:	05/14/2024
Reported:	05/15/2024	Sampling Type:	Soil
Project Name:	LOUISE FEE #002	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02993A (TASK 310)	Sample Received By:	Shalyn Rodriguez
Project Location:	EDDY COUNTY, NEW MEXICO		

Sample ID: ISW - 1 (2') (H242611-01)

BTX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/14/2024	ND	1.86	92.8	2.00	8.30	
Toluene*	<0.050	0.050	05/14/2024	ND	1.98	99.2	2.00	6.36	
Ethylbenzene*	<0.050	0.050	05/14/2024	ND	2.01	101	2.00	5.40	
Total Xylenes*	<0.150	0.150	05/14/2024	ND	6.25	104	6.00	5.01	
Total BTX	<0.300	0.300	05/14/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 107 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	05/15/2024	ND	432	108	400	3.64	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/14/2024	ND	186	92.8	200	1.84	
DRO >C10-C28*	<10.0	10.0	05/14/2024	ND	199	99.6	200	4.76	
EXT DRO >C28-C36	<10.0	10.0	05/14/2024	ND					

Surrogate: 1-Chlorooctane 101 % 48.2-134

Surrogate: 1-Chlorooctadecane 112 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

TETRA TECH
 CHRISTIAN LLULL
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received: 05/14/2024
 Reported: 05/15/2024
 Project Name: LOUISE FEE #002
 Project Number: 212C - MD - 02993A (TASK 310)
 Project Location: EDDY COUNTY, NEW MEXICO

Sampling Date: 05/14/2024
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Shalyn Rodriguez

Sample ID: FS - 4 (5') (H242611-02)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	05/14/2024	ND	1.86	92.8	2.00	8.30		
Toluene*	<0.050	0.050	05/14/2024	ND	1.98	99.2	2.00	6.36		
Ethylbenzene*	<0.050	0.050	05/14/2024	ND	2.01	101	2.00	5.40		
Total Xylenes*	<0.150	0.150	05/14/2024	ND	6.25	104	6.00	5.01		
Total BTEx	<0.300	0.300	05/14/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 107 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	16.0	16.0	05/15/2024	ND	432	108	400	3.64		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/14/2024	ND	186	92.8	200	1.84	
DRO >C10-C28*	<10.0	10.0	05/14/2024	ND	199	99.6	200	4.76	
EXT DRO >C28-C36	<10.0	10.0	05/14/2024	ND					

Surrogate: 1-Chlorooctane 108 % 48.2-134

Surrogate: 1-Chlorooctadecane 114 % 49.1-148

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Analytical Results For:

TETRA TECH
 CHRISTIAN LLULL
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received: 05/14/2024
 Reported: 05/15/2024
 Project Name: LOUISE FEE #002
 Project Number: 212C - MD - 02993A (TASK 310)
 Project Location: EDDY COUNTY, NEW MEXICO

Sampling Date: 05/14/2024
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Shalyn Rodriguez

Sample ID: FS - 6 (H242611-03)

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/14/2024	ND	1.86	92.8	2.00	8.30	
Toluene*	<0.050	0.050	05/14/2024	ND	1.98	99.2	2.00	6.36	
Ethylbenzene*	<0.050	0.050	05/14/2024	ND	2.01	101	2.00	5.40	
Total Xylenes*	<0.150	0.150	05/14/2024	ND	6.25	104	6.00	5.01	
Total BTEX	<0.300	0.300	05/14/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 108 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	05/15/2024	ND	432	108	400	3.64	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/14/2024	ND	186	92.8	200	1.84	
DRO >C10-C28*	<10.0	10.0	05/14/2024	ND	199	99.6	200	4.76	
EXT DRO >C28-C36	<10.0	10.0	05/14/2024	ND					

Surrogate: 1-Chlorooctane 104 % 48.2-134

Surrogate: 1-Chlorooctadecane 111 % 49.1-148

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Notes and Definitions

- QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- ** Samples not received at proper temperature of 6°C or below.
- *** Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
Samples reported on an as received basis (wet) unless otherwise noted on report

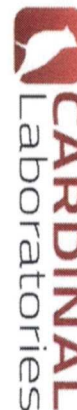
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A handwritten signature in black ink, appearing to read "Caley D. Keene".

Caley D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: Tetra Tech

BILL TO

ANALYSIS REQUEST

Company Name: Tetra Tech Project Manager: Christian Lulil Address: 8911 Capital o Texas Hwy, Suite 2310 City: Austin State: TX Zip: 78750 Phone #: (512)565-0190 Fax #: Project #: 212C-MD-02993A, Task 310 Project Owner: ConocoPhillips Project Name: Louise Fee #002 Project Location: Eddy County, New Mexico Sampler Name: Colton Bickerstaff										P.O. #: Company: Tetra Tech Attn: Christian Lulil Address: EMAIL City: State: Zip: Phone #: Fax #:										BILL TO										ANALYSIS REQUEST									
Lab I.D. <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> Sample I.D. <div style="display: flex; justify-content: space-between;"> <div> 12/12/2024 2 FS-4 (5) FS-6 </div> <div> (G)RAB OR (C)OMP. # CONTAINERS GROUNDWATER WASTEWATER SOIL OIL SLUDGE OTHER : ACID/BASE: ICE / COOL OTHER : </div> <div> C 1 C 1 C 1 C 1 </div> <div> X X X X </div> <div> X X X X </div> <div> 5/14/2024 5/14/2024 5/14/2024 5/14/2024 </div> <div> X X X X </div> </div> </div>										TPH 8015M BTEX 8021B Chloride SM4500Cl-B																													
										Relinquished By: Colton Bickerstaff Date: 5/14/2024 Time: 1100 Date: Time:										Received By: <i>Spadeleque</i> Date: Time:										Verbal Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Phone #:									
Relinquished By: Date: Time:										Received By: Date: Time:										REMARKS:																			
Delivered By: (Circle One) Sampler - UPS - Bus - Other:										Observed Temp. °C Corrected Temp. °C: 4.3 Sample Condition Cool <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Hot <input type="checkbox"/> Yes <input type="checkbox"/> No										CHECKED BY: (Initials) <i>SP</i> Thermometer: <input checked="" type="checkbox"/> Standard <input type="checkbox"/> Secondary (only Sample Condition) Hot <input checked="" type="checkbox"/> Cool <input type="checkbox"/> Thermometer ID: #113 Correction Factor: -0.5°C Observed Temp. °C: #140										<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No Corrected Temp. °C:									

FORM-006 R 3.2 10/07/21

† Cardinal cannot accept verbal changes. Please email changes to celey.keene@cardinallabsnm.com

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

QUESTIONS

Action 354202

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:	229137
	Action Number:	354202
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAB1819154956
Incident Name	NAB1819154956 LOUISE FEE #002 @ 30-015-20264
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Well	[30-015-20264] LOUISE FEE #002

Location of Release Source	
Please answer all the questions in this group.	
Site Name	LOUISE FEE #002
Date Release Discovered	07/07/2018
Surface Owner	Private

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	Cause: Corrosion Other (Specify) Crude Oil Released: 6 BBL Recovered: 2 BBL Lost: 4 BBL.
Produced Water Released (bbls) Details	Cause: Corrosion Other (Specify) Produced Water Released: 6 BBL Recovered: 2 BBL Lost: 4 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	No
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.

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

QUESTIONS, Page 2

Action 354202

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:
	229137
	Action Number:
	354202
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	Unavailable.
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: Christian LLuLL Title: Project Manager Email: christian.llull@tetrattech.com Date: 12/18/2023
--	--

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QUESTIONS, Page 3

Action 354202

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:
	229137
	Action Number:
	354202
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)	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 300 and 500 (ft.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Greater than 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Between 1 and 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1 and 5 (mi.)
Any other fresh water well or spring	Between 1 and 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Between 1 and 5 (mi.)
A wetland	Greater than 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Medium
A 100-year floodplain	Zero feet, overlying, or within area
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan

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

Requesting a remediation plan approval with this submission	Yes
Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No

Soil Contamination Sampling: (Provide the highest observable value for each, in milligrams per kilograms.)

Chloride	(EPA 300.0 or SM4500 Cl B)	3520
TPH (GRO+DRO+MRO)	(EPA SW-846 Method 8015M)	35642
GRO+DRO	(EPA SW-846 Method 8015M)	31142
BTEX	(EPA SW-846 Method 8021B or 8260B)	67.4
Benzene	(EPA SW-846 Method 8021B or 8260B)	0

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

On what estimated date will the remediation commence	04/18/2024
On what date will (or did) the final sampling or liner inspection occur	04/23/2024
On what date will (or was) the remediation complete(d)	04/23/2024
What is the estimated surface area (in square feet) that will be reclaimed	1100
What is the estimated volume (in cubic yards) that will be reclaimed	56
What is the estimated surface area (in square feet) that will be remediated	1100
What is the estimated volume (in cubic yards) that will be remediated	56

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.

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QUESTIONS, Page 4

Action 354202

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 354202
	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>	
(Ex Situ) Excavation and off-site disposal (i.e. dig and haul, hydrovac, etc.)	Yes
Which OCD approved facility will be used for off-site disposal	HALFWAY DISPOSAL AND LANDFILL [fEEM0112334510]
OR which OCD approved well (API) will be used for off-site disposal	Not answered.
OR is the off-site disposal site, to be used, out-of-state	No
OR is the off-site disposal site, to be used, an NMED facility	No
(Ex Situ) Excavation and on-site remediation (i.e. On-Site Land Farms)	No
(In Situ) Soil Vapor Extraction	No
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	No
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	No
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	No
Ground Water Abatement pursuant to 19.15.30 NMAC	No
OTHER (Non-listed remedial process)	No
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
I hereby agree and sign off to the above statement	Name: Christian LLuLL Title: Project Manager Email: christian.llull@tetrattech.com Date: 12/18/2023
<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 5

Action 354202

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 354202
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

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

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QUESTIONS, Page 6

Action 354202

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:	229137
	Action Number:	354202
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	342459
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	05/10/2024
What was the (estimated) number of samples that were to be gathered	6
What was the sampling surface area in square feet	1105

Remediation Closure Request

Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.

Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No
All areas reasonably needed for production or subsequent drilling operations have been stabilized, returned to the sites existing grade, and have a soil cover that prevents ponding of water, minimizing dust and erosion	Yes
What was the total surface area (in square feet) remediated	740
What was the total volume (cubic yards) remediated	70
All areas not reasonably needed for production or subsequent drilling operations have been reclaimed to contain a minimum of four feet of non-waste contain earthen material with concentrations less than 600 mg/kg chlorides, 100 mg/kg TPH, 50 mg/kg BTEX, and 10 mg/kg Benzene	Yes
What was the total surface area (in square feet) reclaimed	740
What was the total volume (in cubic yards) reclaimed	70
Summarize any additional remediation activities not included by answers (above)	N/A

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: Christian LLuLL Title: Project Manager Email: christian.llull@tetrattech.com Date: 06/14/2024
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QUESTIONS, Page 7

Action 354202

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 354202
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Reclamation Report	
Only answer the questions in this group if all reclamation steps have been completed.	
Requesting a reclamation approval with this submission	No

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CONDITIONS

Action 354202

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 354202
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
bhall	Closure approved.	6/17/2024
bhall	A reclamation report will not be accepted until reclamation of the release area, including areas reasonably needed for production or drilling activities, is complete and meet the requirements of 19.15.29.13 NMAC. Areas not reasonably needed for production or drilling activities will still need to be reclaimed and revegetated as early as practicable.	6/17/2024
bhall	The reclamation report will need to include: Executive Summary of the reclamation activities; Scaled Site Map including sampling locations; Analytical results including, but not limited to, results showing that any remaining impacts meet the reclamation standards and results to prove the backfill is non-waste containing; At least one (1) representative 5-point composite sample will need to be collected from the backfill material that will be used for the reclamation of the top four feet of the excavation. OCD reserves the right to request additional sampling if needed; pictures of the backfilled areas showing that the area is back, as nearly as practical, to the original condition or the final land use and maintain those areas to control dust and minimize erosion to the extent practical; pictures of the top layer, which is either the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater; and a revegetation plan.	6/17/2024
bhall	Operator failed to provide proper Sampling Notification pursuant to 19.15.29.12.D.(1).(a) NMAC. Failure to provide proper sampling notice is a compliance issue and OCD may pursue compliance actions pursuant to 19.15.5 NMAC. Operator shall ensure future compliance with 19.15.29.12.D.(1).(a) NMAC	6/17/2024