

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

Our ref: 12670306 – NMOCD - 1

September 05, 2025

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

Closure Report  
ConocoPhillips Company  
Littlefield Fed 33N CTB  
Unit Letter F, Section 33, T26S, R29E  
GPS: 32.002200001, -103.990300001  
Eddy County, New Mexico

## 1. Introduction

GHD Services Inc. (GHD), on behalf of ConocoPhillips Company (Conoco) has prepared this *Closure Report* to document site assessment activities at Littlefield Fed 33N CTB (Site). The purpose of the assessment was to determine the presence or absence of impacts to soil following a release of produced water within a lined containment at the Site. Based on field observations, Conoco is submitting this *Closure Report*, describing site assessment activities that have occurred and requesting closure for Incident Number nAPP2509147808.

## 2. Site Description and Release Summary

The Site is in Unit F, Section 33, Township 26 South, Range 28 East, in Eddy County, New Mexico (32.002200001N, -103.990300001W) and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management (BLM). On March 27, 2025, a spill of 13 barrels (bbls) of produced water was released into the lined secondary containment due to corrosion on a water tank. A vacuum truck was dispatched to the Site to recover free-standing fluids; all 13 bbls of produced water was recovered from within the lined containment. The release was reported to the New Mexico Oil Conservation Division (NMOCD) on April 1, 2025, and was subsequently assigned Incident Number nAPP2509147808.

## 3. Site Characterization and Closure Criteria

The Site was characterized to assess applicability of Table I, Closure Criteria for Soils Impacted by a Release, of Title 19, Chapter 15, Part 29 (NMAC 19.15.29) of the New Mexico Administrative Code (NMAC). Results from the characterization desktop review are summarized below and a Site Map is presented on **Figure 1**.

According to the soil survey provided by the United States Department of Agriculture National Resources Conservation Services, the soils located within the Site consists of primarily of the Russler-Ector association, 0 to 9 percent slopes. The Site is located within an area of high karst.

Groundwater was determined utilizing the New Mexico Office of the State Engineers (NMOSE) database for registered water wells, no known water sources is located with 0.50-mile radius of the Site. The nearest permitted groundwater well with depth to groundwater data is boring C-04823 POD 4 located approximately 1.33 miles east of the Site. The well has a reported depth to groundwater at 49.6 feet below ground surface (ft bgs) on June 18, 2024. A copy of the referenced well record is included in **Attachment A**.

This Site is not within 300 feet of any continuous flowing watercourse or 100-year floodplains. The Site is greater than 5 miles from an occupied residence, school, hospital, institution, or church and the nearest fresh water well for livestock watering purposes is located approximately 1.78 miles east of the Site. The nearest playa wetland is approximately 0.29 miles northeast of the Site and approximately 0.46 miles from the 100-year floodplain of the Pecos River. The nearest subsurface mine is greater than 5 miles away. The location of the Site is depicted on **Figure 1**. A detailed map of the Site is provided in **Figure 2**. The Site Characterization Documentation is included in **Attachment B**.

Based on the results of the Site Characterization desktop review and not having confirmed depth to groundwater within 0.5 miles of the Site and the high karst potential, the following NMOCD Table I Closure Criteria (Closure Criteria) apply:

Table 1 Closure Criteria for Soils Impacted by a Release (NMAC 19.15.29.12)

Regulatory Standard	Benzene (mg/kg)	BTEX (mg/kg)	TPH (GRO+DRO) (mg/kg)	TPH (GRO+DRO+MRO) (mg/kg)	Chloride (mg/kg)
19.15.29.12 NMAC Table I Closure Criteria for Soils Impacted by a Release.	10	50	---	100	600
Notes: --- = not defined TPH = total petroleum hydrocarbons GRO+DRO+MRO = Gasoline Range Organics + Diesel Range Organics + Motor Oil/Lube Range Organics BTEX = benzene, toluene, ethylbenzene, and xylene					

## 4. Site Assessment Activities

The liner inspection notice was provided on July 31, 2025. A liner integrity inspection was performed on August 6, 2025, after the secondary containment was cleaned for a visual inspection. The liner was visually inspected and no rips, tears, holes, or damages in the liner were observed. The liner was determined to be intact with no integrity issues. Photographic documentation of the liner inspection is presented in **Attachment C**.

## 5. Closure Request

Based on the liner inspection and assessment activities at the Site, Conoco respectfully requests that no further actions be required, and requests closure of Incident Number nAPP2509147808 be granted.

Regards,



**Kayla Taylor**  
Senior Project Manager  
+1 432 210-5443  
kayla.taylor@ghd.com

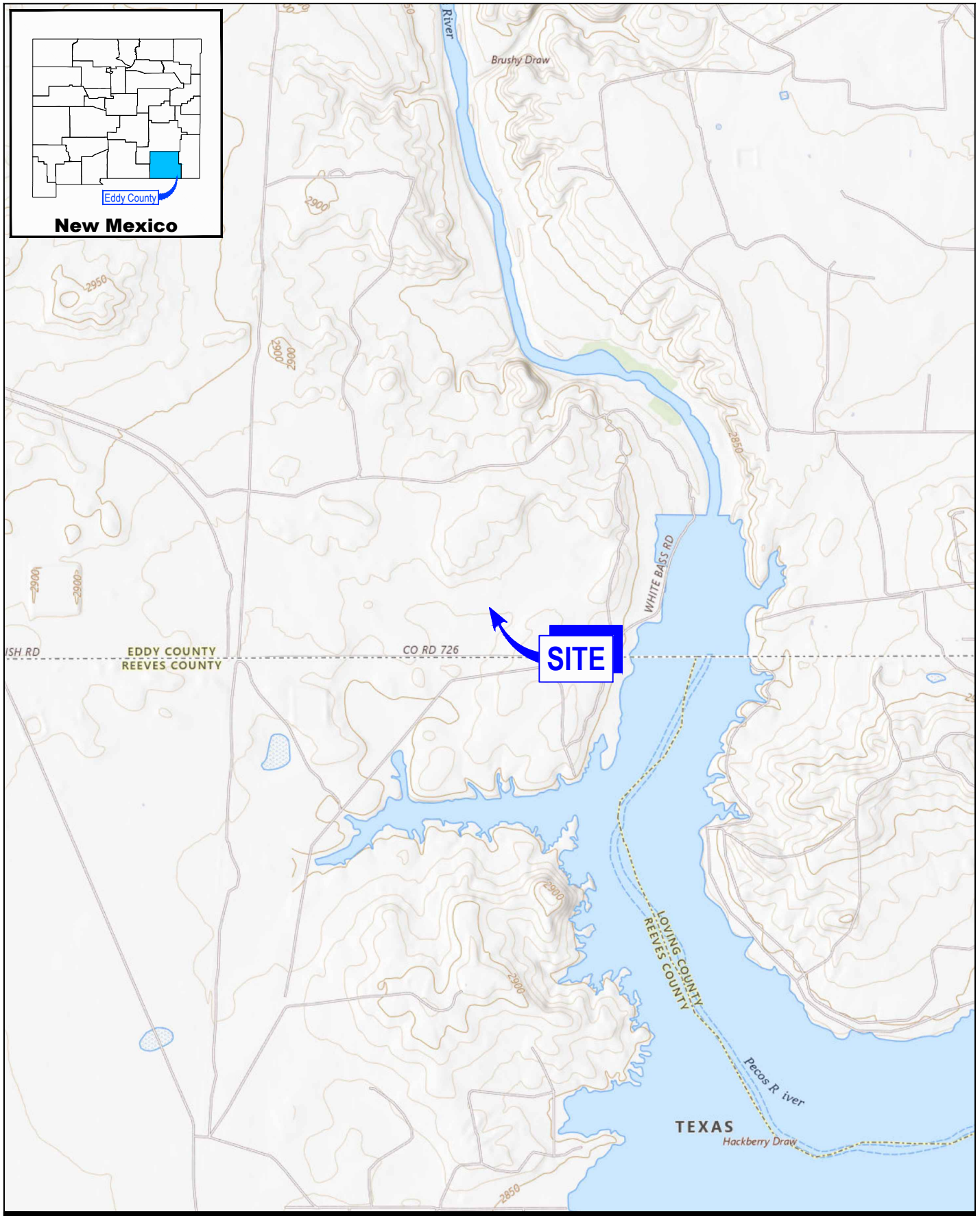


**Jessica Wright**  
Project Director  
+1 713 337-5419  
jessica.wright@ghd.com

KT/lg/1

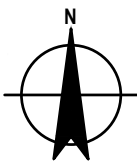
Encl.    Figure 1 – Site Location Map  
          Figure 2 – Site Details Map  
          Attachment A- Referenced Well Records  
          Attachment B – Site Characterization Documentation  
          Attachment C– Photographic Documentation

# Figures



0 1000 2000 ft

1" = 2000 ft  
Coordinate System:  
NAD 1983 State Plane-  
New Mexico East (US Feet)



CONOCOPHILLIPS COMPANY  
EDDY COUNTY, NEW MEXICO  
LITTLEFIELD FED 33N CTB  
INCIDENT No. nAPP2509147808

Project No. 12670306  
Date August 2025

SITE LOCATION MAP

FIGURE 1



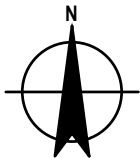


**LEGEND**

CONTAINMENT AREA



1" = 50 ft  
Coordinate System:  
NAD 1983 State Plane-  
New Mexico East (US Feet)



CONOCOPHILLIPS COMPANY  
EDDY COUNTY, NEW MEXICO  
LITTLEFIELD FED 33N CTB  
INCIDENT No. nAPP2509147808

Project No. 12670306  
Date August 2025

**SITE DETAILS MAP**

**FIGURE 2**

# Attachments

# **Attachment A**

## **Well Reports**





# WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

[www.ose.state.nm.us](http://www.ose.state.nm.us)

OCD OFF JUL 31 2024 4:22

1. GENERAL AND WELL LOCATION	OSE POD NO. (WELL NO.) POD 4 (BH-4)		WELL TAG ID NO. N/A		OSE FILE NO(S). C-04823			
	WELL OWNER NAME(S) Devon Energy				PHONE (OPTIONAL)			
	WELL OWNER MAILING ADDRESS 5315 Buena Vista Dr.				CITY Carlsbad	STATE NM	ZIP 88220	
	WELL LOCATION (FROM GPS)	DEGREES 32	MINUTES 00	SECONDS 2.71	N	* ACCURACY REQUIRED: ONE TENTH OF A SECOND		
		LONGITUDE 103	58	1.41	W	* DATUM REQUIRED: WGS 84		
DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS - PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE SW L12 Sec 34. T26S, R 29E, NMPM								
2. DRILLING & CASING INFORMATION	LICENSE NO. 1249		NAME OF LICENSED DRILLER Jackie D. Atkins			NAME OF WELL DRILLING COMPANY Atkins Engineering Associates, Inc.		
	DRILLING STARTED 06/18/2024	DRILLING ENDED 06/18/2024	DEPTH OF COMPLETED WELL (FT) Soil Boring		BORE HOLE DEPTH (FT) ±60	DEPTH WATER FIRST ENCOUNTERED (FT) ±49		
	COMPLETED WELL IS: <input type="checkbox"/> ARTESIAN <input type="checkbox"/> DRY HOLE <input checked="" type="checkbox"/> SHALLOW (UNCONFINED)				STATIC WATER LEVEL IN COMPLETED WELL (FT) 49.6	DATE STATIC MEASURED 6/18/2024		
	DRILLING FLUID: <input type="checkbox"/> AIR <input type="checkbox"/> MUD ADDITIVES - SPECIFY:							
	DRILLING METHOD: <input type="checkbox"/> ROTARY <input type="checkbox"/> HAMMER <input type="checkbox"/> CABLE TOOL <input checked="" type="checkbox"/> OTHER - SPECIFY: Hollow Stem Auger					CHECK HERE IF PITLESS ADAPTER IS INSTALLED <input type="checkbox"/>		
	DEPTH (feet bgl)		BORE HOLE DIAM (inches)	CASING MATERIAL AND/OR GRADE (include each casing string, and note sections of screen)	CASING CONNECTION TYPE (add coupling diameter)	CASING INSIDE DIAM. (inches)	CASING WALL THICKNESS (inches)	SLOT SIZE (inches)
	FROM	TO						
	0	60	±6.25	Soil Boring	--	--	--	--
3. ANNULAR MATERIAL	DEPTH (feet bgl)		BORE HOLE DIAM. (inches)	LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL	AMOUNT (cubic feet)	METHOD OF PLACEMENT		
	FROM	TO						
				N/A				

FOR OSE INTERNAL USE

WR-20 WELL RECORD & LOG (Version 01/28/2022)

FILE NO. <u>C-4823-POD4 BH-4</u>	POD NO. <u>4</u>	TRN NO. <u>758355</u>
LOCATION <u>Devon 26.29.34.144</u>	WELL TAG ID NO. <u>---</u>	PAGE 1 OF 2

4. HYDROGEOLOGIC LOG OF WELL	DEPTH (feet bgl)		THICKNESS (feet)	COLOR AND TYPE OF MATERIAL ENCOUNTERED - INCLUDE WATER-BEARING CAVITIES OR FRACTURE ZONES (attach supplemental sheets to fully describe all units)	WATER BEARING? (YES / NO)	ESTIMATED YIELD FOR WATER- BEARING ZONES (gpm)
	FROM	TO				
	0	9	9	SAND, dry, light brown, poorly graded with silt, very fine to fine grain,	Y    ✓ N	
	9	35	26	SILT, dry, reddish brown, poorly graded with gypsum vein crystalline, Dry	Y    ✓ N	
	35	60	25	SILT, dry, reddish brown, poorly graded, trace clay, wet	✓ Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
					Y    N	
METHOD USED TO ESTIMATE YIELD OF WATER-BEARING STRATA: <input type="checkbox"/> PUMP <input type="checkbox"/> AIR LIFT <input type="checkbox"/> BAILER <input type="checkbox"/> OTHER - SPECIFY:					TOTAL ESTIMATED WELL YIELD (gpm):    0.00	

5. TEST; RIG SUPERVISION	WELL TEST	TEST RESULTS - ATTACH A COPY OF DATA COLLECTED DURING WELL TESTING, INCLUDING DISCHARGE METHOD, START TIME, END TIME, AND A TABLE SHOWING DISCHARGE AND DRAWDOWN OVER THE TESTING PERIOD.
	MISCELLANEOUS INFORMATION: Soil boring plugged using Type I/II Neat Cement from total depth to surface Logs adapted from eTech on-site personal  DSC 011 JUL 31 2024 12:22	
	PRINT NAME(S) OF DRILL RIG SUPERVISOR(S) THAT PROVIDED ONSITE SUPERVISION OF WELL CONSTRUCTION OTHER THAN LICENSEE: Shane Eldridge, Cameron Pruitt	

6. SIGNATURE
THE UNDERSIGNED HEREBY CERTIFIES THAT, TO THE BEST OF HIS OR HER KNOWLEDGE AND BELIEF, THE FOREGOING IS A TRUE AND CORRECT RECORD OF THE ABOVE DESCRIBED HOLE AND THAT HE OR SHE WILL FILE THIS WELL RECORD WITH THE STATE ENGINEER AND THE PERMIT HOLDER WITHIN 30 DAYS AFTER COMPLETION OF WELL DRILLING:  <u>Jack Atkins</u> Jackie D. Atkins    07/30/2024 Jack Atkins (Jul 30, 2024 15:11 MDT) SIGNATURE OF DRILLER / PRINT SIGNEE NAME    DATE

FOR USE INTERNAL USE

WR-20 WELL RECORD &amp; LOG (Version 01/28/2022)

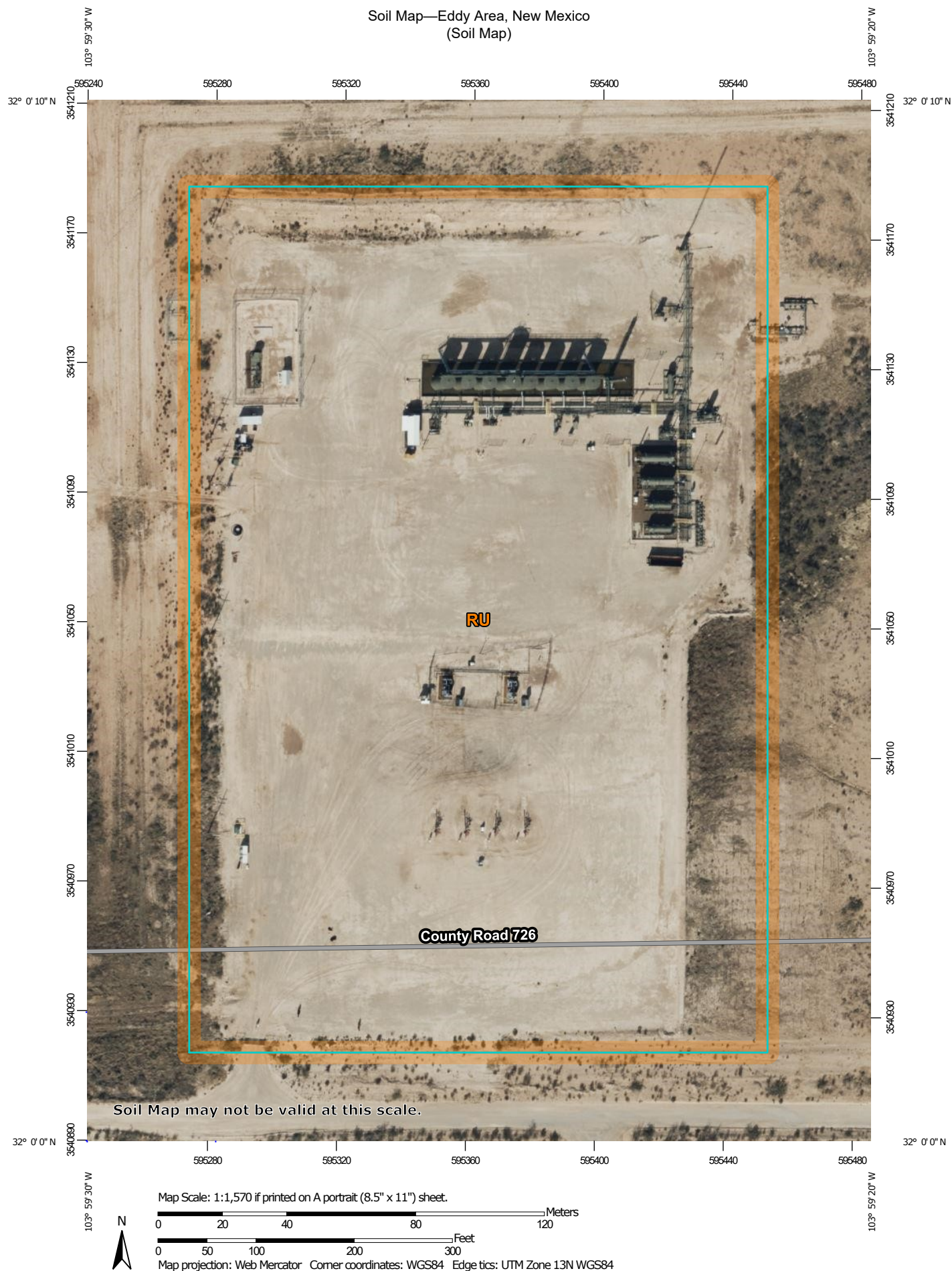
FILE NO. <u>C-4823-POD4 BH-4</u>	POD NO. <u>4</u>	TRN NO. <u>758355</u>
LOCATION <u>Mon 26.29.34.144</u>		WELL TAG ID NO. <u>                    </u>

PAGE 2 OF 2

# **Attachment B**

## **Site Characterization Documentation**





Natural Resources  
Conservation Service

Web Soil Survey  
National Cooperative Soil Survey

7/24/2025  
Page 1 of 3

Soil Map—Eddy Area, New Mexico  
(Soil Map)

## MAP LEGEND

### Area of Interest (AOI)

 Area of Interest (AOI)

### Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

### Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

### Water Features



Streams and Canals

### Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

### Background



Aerial Photography

## MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:20,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service

Web Soil Survey URL:

Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Eddy Area, New Mexico

Survey Area Data: Version 20, Sep 3, 2024

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Nov 12, 2022—Dec 2, 2022

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.



Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
RU	Russler-Ector association, 0 to 9 percent slopes	11.9	100.0%
Totals for Area of Interest		11.9	100.0%



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

Soil Description

## Eddy Area, New Mexico

### RU—Russler-Ector association, 0 to 9 percent slopes

#### Map Unit Setting

*National map unit symbol:* 1w5k

*Elevation:* 1,250 to 4,800 feet

*Mean annual precipitation:* 10 to 25 inches

*Mean annual air temperature:* 57 to 66 degrees F

*Frost-free period:* 195 to 225 days

*Farmland classification:* Not prime farmland

#### Map Unit Composition

*Russler and similar soils:* 60 percent

*Ector and similar soils:* 25 percent

*Minor components:* 15 percent

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

#### Description of Russler

##### Setting

*Landform:* Plains, alluvial fans

*Landform position (three-dimensional):* Rise

*Down-slope shape:* Convex, linear

*Across-slope shape:* Linear

*Parent material:* Alluvium

##### Typical profile

*H1 - 0 to 11 inches:* loam

*H2 - 11 to 45 inches:* clay loam

*H3 - 45 to 60 inches:* gypsiferous material

##### Properties and qualities

*Slope:* 1 to 3 percent

*Depth to restrictive feature:* 20 to 47 inches to paralithic bedrock

*Drainage class:* Well drained

*Runoff class:* Medium

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

*Depth to water table:* More than 80 inches

*Frequency of flooding:* None

*Frequency of ponding:* None

*Calcium carbonate, maximum content:* 15 percent

*Gypsum, maximum content:* 40 percent

*Maximum salinity:* Moderately saline to strongly saline (8.0 to 16.0 mmhos/cm)

*Sodium adsorption ratio, maximum:* 4.0

*Available water supply, 0 to 60 inches:* Low (about 4.4 inches)

##### Interpretive groups

*Land capability classification (irrigated):* 3e

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

Soil Description

*Land capability classification (nonirrigated): 7e*  
*Hydrologic Soil Group: C*  
*Ecological site: R042CY153NM - Loamy*  
*Hydric soil rating: No*

## Description of Ector

### Setting

*Landform: Ridges, hills*  
*Landform position (two-dimensional): Shoulder, backslope, footslope, toeslope*  
*Landform position (three-dimensional): Side slope, head slope, nose slope, crest*  
*Down-slope shape: Convex*  
*Across-slope shape: Linear*  
*Parent material: Residuum weathered from limestone*

### Typical profile

*H1 - 0 to 8 inches: very cobbly loam*  
*H2 - 8 to 60 inches: bedrock*

### Properties and qualities

*Slope: 0 to 9 percent*  
*Depth to restrictive feature: 4 to 20 inches to lithic bedrock*  
*Drainage class: Well drained*  
*Runoff class: High*  
*Capacity of the most limiting layer to transmit water (Ksat): Moderately low to high (0.06 to 2.00 in/hr)*  
*Depth to water table: More than 80 inches*  
*Frequency of flooding: None*  
*Frequency of ponding: None*  
*Calcium carbonate, maximum content: 60 percent*  
*Maximum salinity: Nonsaline to slightly saline (0.0 to 4.0 mmhos/cm)*  
*Sodium adsorption ratio, maximum: 1.0*  
*Available water supply, 0 to 60 inches: Very low (about 0.7 inches)*

### Interpretive groups

*Land capability classification (irrigated): None specified*  
*Land capability classification (nonirrigated): 7s*  
*Hydrologic Soil Group: D*  
*Ecological site: R042CY158NM - Very Shallow*  
*Hydric soil rating: No*

## Minor Components

### Gypsum land

*Percent of map unit: 8 percent*  
*Hydric soil rating: No*

### Cottonwood

*Percent of map unit: 7 percent*  
*Ecological site: R070BB006NM - Gyp Upland*

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

Soil Description

*Hydric soil rating:* No

## Data Source Information

Soil Survey Area: Eddy Area, New Mexico

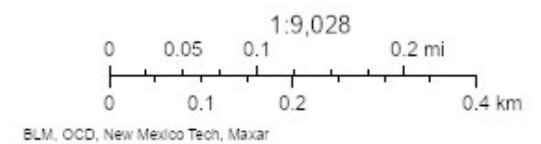
Survey Area Data: Version 20, Sep 3, 2024

# Karst Potential Map

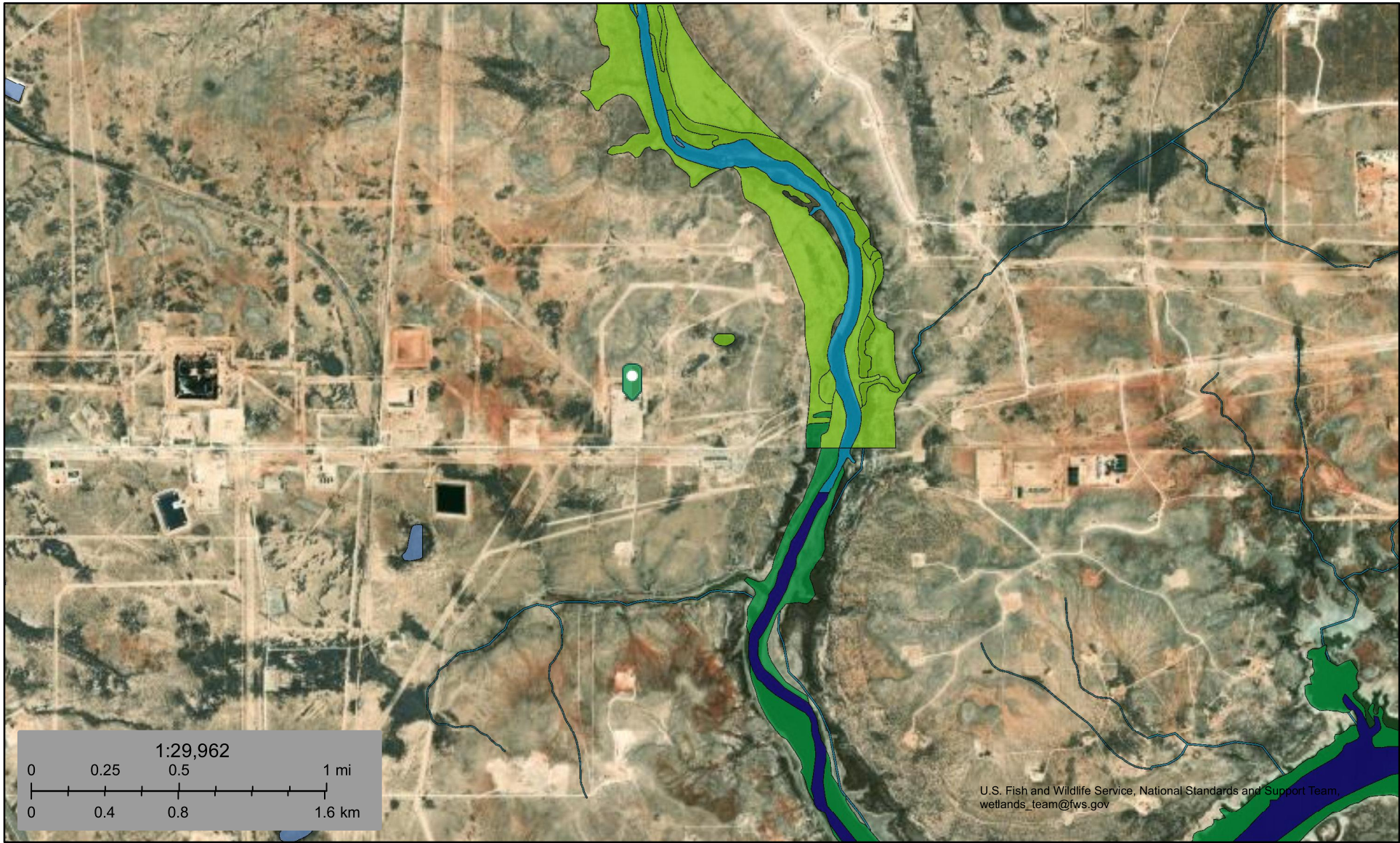


7/25/2025, 3:23:07 PM

Karst Occurrence Potential  Medium  
 High







August 18, 2025

Wetlands

- |   |                                |   |                                   |   |          |
|---|--------------------------------|---|-----------------------------------|---|----------|
|  | Estuarine and Marine Deepwater |  | Freshwater Emergent Wetland       |  | Lake     |
|  | Estuarine and Marine Wetland   |  | Freshwater Forested/Shrub Wetland |  | Other    |
|   |                                |  | Freshwater Pond                   |  | Riverine |

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.



# National Flood Hazard Layer FIRMette



103°59'44"W 32°0'23"N



Released to Imaging: 11/19/2025 9:44:28 AM

1:6,000

103°59'6"W 31°59'53"N

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 7/25/2025 at 3:00 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.



# **Attachment C**

## **Photographic Documentation**

ConocoPhillips Company  
Littlefield Fed 33N CTB  
Incident No. nAPP2509147808  
Eddy County, New Mexico

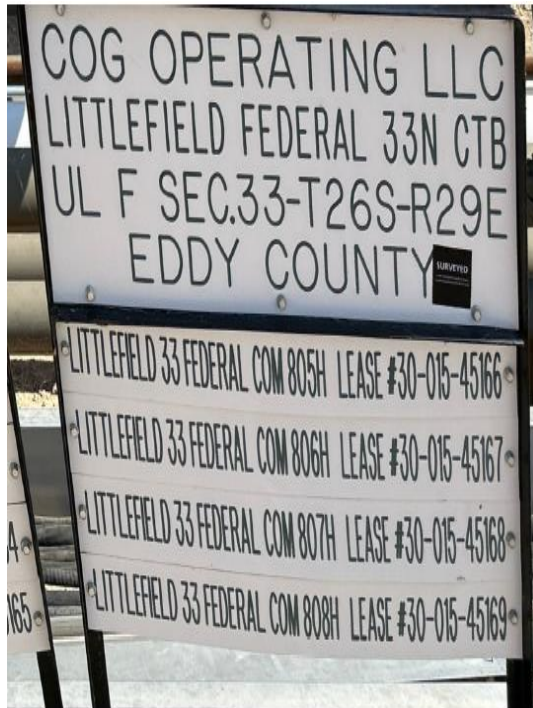


Photo 1 View of Signage



Photo 2 View of containment facing northeast.

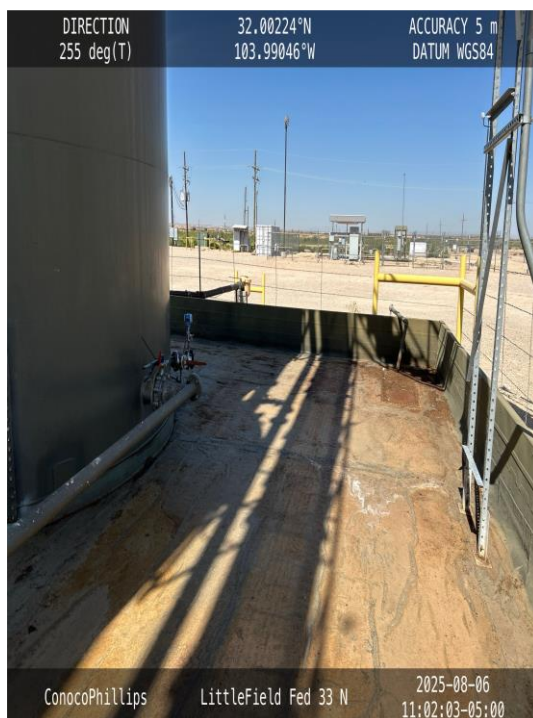


Photo 3 View of containment facing west.



Photo 4 View of containment facing east.

ConocoPhillips Company  
Littlefield Fed 33N CTB  
Incident No. nAPP2509147808  
Eddy County, New Mexico

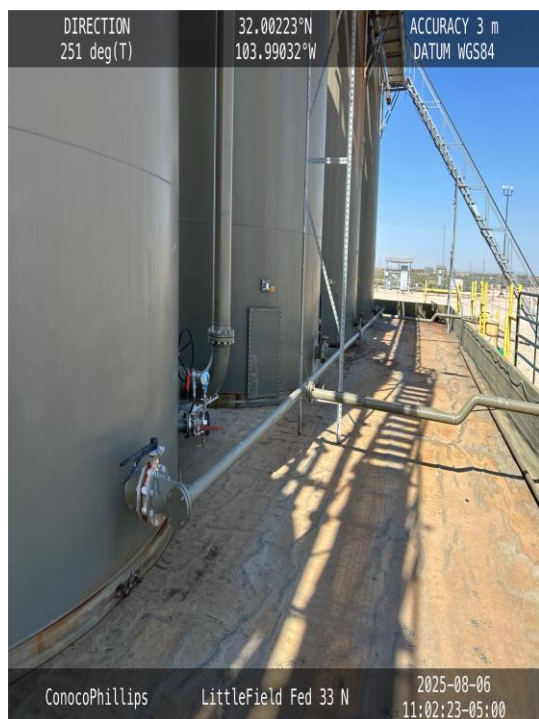


Photo 5 View of containment facing west.

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

General Information  
Phone: (505) 629-6116

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

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

QUESTIONS

Action 516496

**QUESTIONS**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 516496
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Prerequisites</b>	
Incident ID (n#)	nAPP2509147808
Incident Name	NAPP2509147808 LITTLEFIELD FEDERAL 33N CTB @ FAPP2132637025
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Facility	[fAPP2132637025] Littlefield Fed 33N CTB Battery

**Location of Release Source***Please answer all the questions in this group.*

Site Name	Littlefield Federal 33N CTB
Date Release Discovered	03/27/2025
Surface Owner	Federal

**Incident Details***Please answer all the questions in this group.*

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

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

Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Corrosion   Water Tank   Produced Water   Released: 13 BBL   Recovered: 13 BBL   Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.

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

General Information  
Phone: (505) 629-6116

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

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

QUESTIONS, Page 2

Action 516496

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 516496
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

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

**Initial Response**

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

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

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

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

I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: <a href="mailto:brittany.Esparza@ConocoPhillips.com">brittany.Esparza@ConocoPhillips.com</a> Date: 10/17/2025
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**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

QUESTIONS, Page 3

Action 516496

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:
	229137
	Action Number:
	516496
Action Type:	
[C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

**QUESTIONS**

<b>Site Characterization</b>	
<i>Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 26 and 50 (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
<b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>	
A continuously flowing watercourse or any other significant watercourse	Between 500 and 1000 (ft.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 500 and 1000 (ft.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 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	Greater than 5 (mi.)
A wetland	Between 500 and 1000 (ft.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	High
A 100-year floodplain	Between 500 and 1000 (ft.)
Did the release impact areas not on an exploration, development, production, or storage site	No

<b>Remediation Plan</b>	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
On what estimated date will the remediation commence	08/06/2025
On what date will (or did) the final sampling or liner inspection occur	08/06/2025
On what date will (or was) the remediation complete(d)	08/06/2025
What is the estimated surface area (in square feet) that will be remediated	4000
What is the estimated volume (in cubic yards) that will be remediated	0
<i>These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.</i>	
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	



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QUESTIONS, Page 4

Action 516496

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 516496
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Remediation Plan (continued)</b>	
<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>	
<b>This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:</b>	
<i>(Select all answers below that apply.)</i>	
Is (or was) there affected material present needing to be removed	Yes
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	No
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: <a href="mailto:brittany.Esparza@ConocoPhillips.com">brittany.Esparza@ConocoPhillips.com</a> Date: 10/17/2025
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 6

Action 516496

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 516496
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Liner Inspection Information</b>	
Last liner inspection notification (C-141L) recorded	<b>491086</b>
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	<b>08/06/2025</b>
Was all the impacted materials removed from the liner	<b>Yes</b>
What was the liner inspection surface area in square feet	<b>4000</b>

<b>Remediation Closure Request</b>	
<i>Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.</i>	
Requesting a remediation closure approval with this submission	<b>Yes</b>
Have the lateral and vertical extents of contamination been fully delineated	<b>Yes</b>
Was this release entirely contained within a lined containment area	<b>Yes</b>
What was the total surface area (in square feet) remediated	<b>4000</b>
What was the total volume (cubic yards) remediated	<b>0</b>
Summarize any additional remediation activities not included by answers (above)	<b>Liner inspected</b>
<i>The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (in .pdf format) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.</i>	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.	
I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: <a href="mailto:brittany.Esparza@ConocoPhillips.com">brittany.Esparza@ConocoPhillips.com</a> Date: 10/17/2025

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CONDITIONS

Action 516496

CONDITIONS

Operator:  COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:  229137
	Action Number:  516496
	Action Type:  [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
rhamlet	We have received your Remediation Closure Report for Incident #NAPP2509147808 Littlefield Federal 33N CTB, thank you. This Remediation Closure Report is approved.	11/19/2025