



February 5, 2024

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: REVISED Release Characterization and Closure Report
ConocoPhillips (Heritage COG Operating LLC)
SRO State Com #018H Flowline Release
Unit Letter A, Section 17, Township 26 South, Range 28 East
Eddy County, New Mexico
Incident ID nAB1730649817
2RP-4468**

Ms. Hall:

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips Company (COPC) to assess a historical release that occurred from a flowline associated with the SRO State Com #018H (API #30-015-39999). The approximate release site coordinates are 32.004957°, - 104.10095°, located in the Public Land Survey System (PLSS) Unit Letter A, Section 17, Township 26 South, Range 28 East, Eddy County, New Mexico (Site). The Site location is shown on Figures 1 and 2. The site is located on state lands managed by the New Mexico State Land Office (NMSLO).

BACKGROUND

According to the State of New Mexico Oil Conservation Division (NMOCD) C-141 Initial Report, the release was discovered on October 27, 2017. The release was caused by a hole in the poly flowline before the valve at the trunk line header. The release occurred in the pasture at the connection point of the main trunk line Right of Way (ROW). Approximately 20 barrels (bbls) of produced water released, of which 0 bbls of produced water were recovered. The NMOCD approved the initial C-141 on November 2, 2017, and subsequently assigned the release the Remediation Permit (RP) 2RP-4468 and the Incident ID nAB1730649817. The initial C-141 form is included in Appendix A.

The SRO State Com #018H (2RP-4468/nAB1730649817) is included in an Agreed Compliance Order ("ACO") with the NMOCD, related to unresolved releases from COPC's predecessor-in-interest ("COG"). The ACO required COPC to submit characterization and/or remediation plans with proposed timeframes for the ongoing corrective actions or remediations identified to the NMOCD no later than March 31, 2022. As of March 11, 2022, COPC has submitted characterization and remediation plans for all of the properties identified and owned. All documentation was submitted in accordance with ACO terms. These documents have been submitted to the NMOCD via CentreStack, a Secure Access & File Sharing platform, at the direction of Mr. Bradford Billings, NMOCD. The Delineation Workplan previously completed by COG was included as a portion of the ACO.

The SRO State Com #018H (nAB1730649817) footprint is adjacent to an additional release incident associated with the SRO State Com #018H (nAB1719137895). A separate Release Characterization and Work Plan report will be submitted for the associated release. As discussed, Solaris is currently the owner

Tetra Tech

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

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and operator at for the tin horn and production lines at the facility. Rob Kirk, Vice President & General Manager, HSE & Compliance for Aris Water Solutions, has authorized COP to complete remedial work at the facility.

LAND OWNERSHIP

According to the NMOCD Oil and Gas Map, the Site is located on State Trust Lands. A review of the NMSLO Land Status Map was completed and the Site is located within active oil and gas lease VB12840001, which is listed under Concho Oil & Gas LLC/COG Operations LLC. Based on guidance provided by the NMSLO, as the release footprint is located on an active oil and gas lease, and the footprint is wholly located within the boundaries of the active oil and gas lease, no Remediation Right of Entry (ROE) is required at the Site. In an abundance of caution, an ROE was procured and received on October 23, 2023. A copy of the ROE permit is included in Appendix B.

CULTURAL PROPERTIES PROTECTION

Tetra Tech, on behalf of COP, contracted SWCA Environmental Consultants (SWCA) to conduct an intensive pedestrian survey for the SRO State Com #018H Flowline Release area covering 28.84 acres (11.67 ha). The two adjacent releases were grouped based on their respective locations. Due to NMCRIS 139406, a previously qualifying survey, the actual survey area was reduced to a total of 0.05 acres (0.02 ha) on the SLO-managed land in Eddy County, New Mexico.

SLO cultural resources preservation efforts requires that an archaeological survey be conducted to current standards in compliance with New Mexico Administrative Code (NMAC) 4.10.15 to ensure that cultural properties are not inadvertently excavated, harmed, or destroyed by any person. On June 15, 2023, SWCA surveyed a 200-foot buffer from the inadvertent release location footprint(s), located entirely on SLO-managed land. No archaeological sites, historic properties, or isolated occurrences were observed during the investigation. No additional investigation or treatment was recommended regarding the current undertaking. A copy of the NMCRIS Activity No. 153228 is included in Appendix B, Regulatory Correspondence.

INITIAL SITE CHARACTERIZATION

As a portion of the initial Work Plan (described below) a site characterization was performed. The initial Work Plan described the Site conditions and a risk -based approach and was approved by NMOCD, as detailed below.

INITIAL ASSESSMENT (2018)

On February 13, 2018, Tetra Tech personnel were onsite to conduct the initial site assessment. Three (3) auger holes (AH-1, AH-2 and AH-3) were installed to assess the impacted soils to a maximum depth of 2 ft bgs. Soil samples were sent to Xenco Laboratories and were analyzed by EPA method 8015 modified, BTEX by EPA Method 8021B and chloride by EPA method 300.0.

The initial assessment results are summarized in Table 1. Analytical results for AH-1 and AH-3 exceeded the Site RRALS for chloride to a depth of 1.5 ft bgs and 2 ft bgs respectively. The initial assessment sampling locations are indicated on Figure 3.

INITIAL WORK PLAN (2018)

A Work Plan dated November 8, 2018 describing the Site assessment and proposed remedial activities was submitted through CentreStack platform in accordance with ACO terms. This initial Work Plan report proposed to return to the site to vertically define the areas of auger holes (AH-1 and AH-2) using a backhoe, as delineation was incomplete in those areas. The Work Plan stated that once this analytical data was collected, the results would have been provided to the NMOCD and NMSLO for review. Once the data was received by the appropriate agencies and accepted, excavation activities were scheduled to begin to the

appropriate depths. The Initial Work Plan was also submitted separately via the NMOCD Fee Application portal on October 28, 2022.

The Initial Work Plan was approved by the NMOCD on November 29, 2022, with the following comments:

- *Remediation and closure must comply with 19.15.29.12 and 19.15.29.13 NMAC. Horizontal delineation will need to be completed during confirmation sampling. Confirmation samples of all side walls and bases must be representative of no more than 200 square feet.*

A 90-day extension request to December 20, 2023, was approved in an email dated September 21, 2023. Figure 3 shows the initial reported release extent and the 2018 soil boring locations as depicted in the Initial Work Plan. A copy of the 2018 Work Plan is available on the NMOCD online incident files. Associated regulatory Correspondence is included in Appendix B.

REVISED SITE CHARACTERIZATION

Based on the age of the release, a supplementary site characterization was performed and no sinkholes, residences, schools, hospitals, institutions, churches, springs, private domestic water wells, playa lakes, stream bodies, wetlands, incorporated municipal boundaries, subsurface mines, or floodplains are located within the distances specified in 19.15.29 New Mexico Administrative Code (NMAC). The Site is within a New Mexico oil and gas production area. The Site is in an area of medium karst potential.

According to the NMOSE reporting system, there are no water wells within ½ mile (800 meters) of the Site. There is one (1) well within 2.03 miles (3,282 meters) of the Site with an average depth to groundwater of 120 feet below ground surface (bgs).

DTW DETERMINATION

As the available water level information was from a well further than ½ mile away from the Site, COP elected to review adjacent incident release sites with approved reports for possibility of associated borings which could provide a means for determining depth to groundwater in the vicinity of the nAB1730649817 release area. On March 1, 2023, a licensed drilling subcontractor was contracted to drill a borehole to 55 feet bgs to determine depth to water (DTW) as part of the characterization associated with the Graham Cracker 16 State #003H release. The DTW boring is located approximately 0.6 miles east of the SRO State Com #018H Flowline release extent. The borehole was dry upon completion, and soils were dry from surface to total depth. The depth to groundwater in the area was thus verified as greater than 55 feet bgs. The borehole was plugged with 3/8" bentonite chips. The borehole coordinates are 32.049763°, -104.090109°.

Based on the proximity of the nearby DTW borehole, a request was submitted to the NMOCD on October 6, 2023, to ascertain if it would be acceptable to utilize this borehole to determine depth to groundwater at the Site. The NMOCD responded on October 10, 2023, and stated that the attached groundwater determination for the site was acceptable to the NMOCD for SRO State Com #018H. A copy of the correspondence with the NMOCD is included in Appendix B. The boring location is indicated on Figure 4. The revised site characterization data, along with the DTW boring log, is included in Appendix C.

REGULATORY FRAMEWORK

Based upon the release footprint and in accordance with Subsection E of 19.15.29.12 NMAC, per 19.15.29.11 NMAC, and 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 revised site characterization and in accordance with Table I of 19.15.29.12 NMAC, the RRALs for the Site are as follows:

Constituent	Site RRALs
Chloride	10,000 mg/kg
TPH (GRO+DRO+ORO)	2,500 mg/kg
TPH (GRO+DRO)	1,000 mg/kg
BTEX	50 mg/kg
Benzene	10 mg/kg

Additionally, in accordance with the NMOCD guidance *Procedures for Implementation of the Spill Rule (19.15.29 NMAC)* (September 6, 2019), the following reclamation requirements for surface soils (0-4 feet bgs) outside of active oil and gas operations are as follows:

Constituent	Reclamation Requirement
Chloride	600 mg/kg
TPH (GRO+DRO+ORO)	100 mg/kg
BTEX	50 mg/kg

ADDITIONAL ASSESSMENT AND SAMPLING RESULTS

On behalf of COPC, Tetra Tech conducted a visual Site inspection on May 30, 2023, to assess current Site conditions, document the observed impact, and photograph the area. Tetra Tech observed no obvious signs of staining and/or residual impact at the Site, however, sign of surface staining/impacts were observed at the adjacent release area (nAB1719137895). Additionally, the reported nAB1730649817 release footprint exhibited vegetation growth over portions of the former release area. Photographic documentation of current site conditions during the 2023 site visit is included as Appendix D.

2023 ASSESSMENT ACTIVITIES (OCTOBER)

Based on the comments provided by the NMOCD in the approved Work Plan and the findings of the visual inspection, additional soil sampling was conducted to:

1. Complete horizontal delineation; and
2. Assess the current soil contaminant concentrations within the reported release footprint.

On October 24, 2023, Tetra Tech installed nine (9) hand auger borings at the Site (AH-4 through AH-12). A total of ten (10) soil samples were submitted to Cardinal Laboratories in Hobbs, New Mexico for analysis of chloride via Standard Method SM4500Cl-B, TPH via EPA Method 8015M, and BTEX via EPA Method 8021B.

Analytical results from the October 2023 additional assessment sampling activities are summarized in Table 2. All analytical results were below both the reclamation requirements and Site RRALs for all constituents, however, auger refusal was met at shallow depths. Total depths that were sampled during the 2018 assessment were not achieved. Although refusal was encountered, both horizontal and vertical delineation were achieved following the October 2023 soil assessment activities.

2023 ASSESSMENT ACTIVITIES (DECEMBER)

Prior to sampling, on December 18, 2023, the NMOCD district office was notified via the portal in accordance with Subsection D of 19.15.29.12 NMAC. Documentation of associated regulatory correspondence is included in Appendix B.

Tetra Tech returned to the Site on December 18, 2023 to trench two (2) locations (T-1 and T-2) and collect verification samples at depths previously reached during 2018 assessment activities and fortify the October sampling findings. A total of three (3) soil samples were submitted to Cardinal Laboratories in Hobbs, New Mexico for analysis of chloride via Standard Method SM4500Cl-B, TPH via EPA Method 8015M, and BTEX via EPA Method 8021B. Analytical results from the December 2023 additional assessment sampling

activities are summarized in Table 2. All analytical results were below the reclamation requirements and Site RRALs for all constituents.

Results from the additional assessment activities from October and December 2023 indicate that the release footprint originally reported in 2018 no longer appears to be accurate to field. This discrepancy, given the age of the release, may be due to initial response activities, rain, sheet flow, and/or natural attenuation of chlorides which have modified the release footprint over time.

Based on the results of the 2023 analytical results, the soil contaminant concentrations are no longer above cleanup levels. The October and December 2023 hand auger and trench locations, as well as the release extent observed by Tetra Tech, are presented in Figure 4. Copies of laboratory analysis and chain-of-custody documentation are included in Appendix E.

The original release extent consisted of approximately 1,925 sf. Soil samples were collected such that each discrete sample (horizontal and vertical) were representative of no more than 200 square feet of area. A total of six (6) additional samples were collected and analyzed from the release interior (vertical), and seven (7) additional samples from the release perimeter (horizontal) were collected and analyzed during the sampling activities. Samples were collected from the surface and subsurface, to be representative of the release area. The NMOCD was provided with a notification application of confirmation closure sampling.

REVEGETATION PLAN

The former release footprint is exhibiting signs of recolonization, however, areas in the pasture will be reseeded during remedial work on an adjacent site (nAB1719137895), to aid in revegetation. Based on the soils of the site, the NMSLO Loamy Sites Seed Mixture will be used for seeding and will be planted in the amount specified in the pounds pure live seed (PLS) per acre. The seed mixture will be spread by a drill equip with a depth regulator or a hand-held broadcaster and raked. If a hand-held broadcaster is used for dispersal, the pounds pure live seed per acre will be doubled. Revegetation will consist of uniform vegetative cover which has been established that reflects a life-form ratio of plus or minus fifty percent of pre-disturbance levels and a total percent plant cover of at least seventy percent of pre-disturbance levels, excluding noxious weeds. COP will notify the NMSLO when revegetation is complete.

CONCLUSION

All analytical results associated with the additional assessment of the release area were below the reclamation requirements and applicable Site RRALs for all constituents. Based on the approved WP, horizontal delineation of the release was achieved during the additional assessment sampling activities. A depth to groundwater boring was located and verified that groundwater is not present at 50 feet bgs or less. Based on contemporaneous sampling of the formerly impacted areas on an approximate 200 square foot grid, the proposed remedial action approved in the 2018 Work Plan is no longer necessary.

Based on the above, ConocoPhillips respectfully requests closure for this release incident. The final C-141 forms are enclosed in Appendix A. If you have any questions concerning the soil assessment activities for the Site, please call me at (512) 560-9064.

Sincerely,
Tetra Tech, Inc.



Nicholas M. Poole
Project Lead



Christian M. Llull, P.G.
Program Manager

cc:
Mr. Ike Tavarez, RMR – ConocoPhillips
Ms. Tami Knight, NMSLO ECO

LIST OF ATTACHMENTS

Figures:

- Figure 1 – Overview Map
- Figure 2 – Topographic Map
- Figure 3 – Approximate Release Extent and Site Assessment
- Figure 4 – Additional Site Assessment (2023)

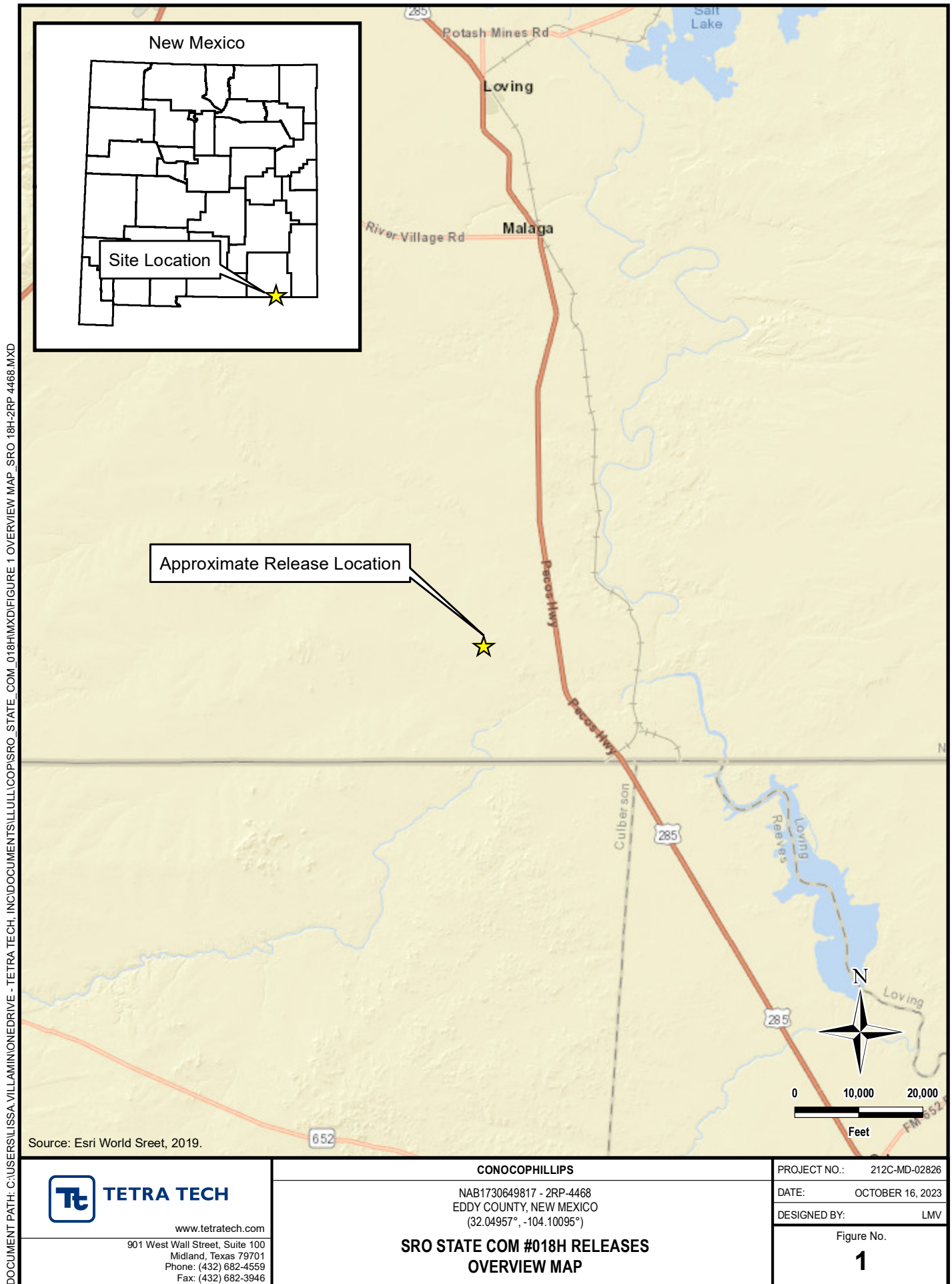
Tables:

- Table 1 – Summary of Analytical Results – 2018 Soil Assessment
- Table 2 – Summary of Analytical Results – 2023 Soil Assessment

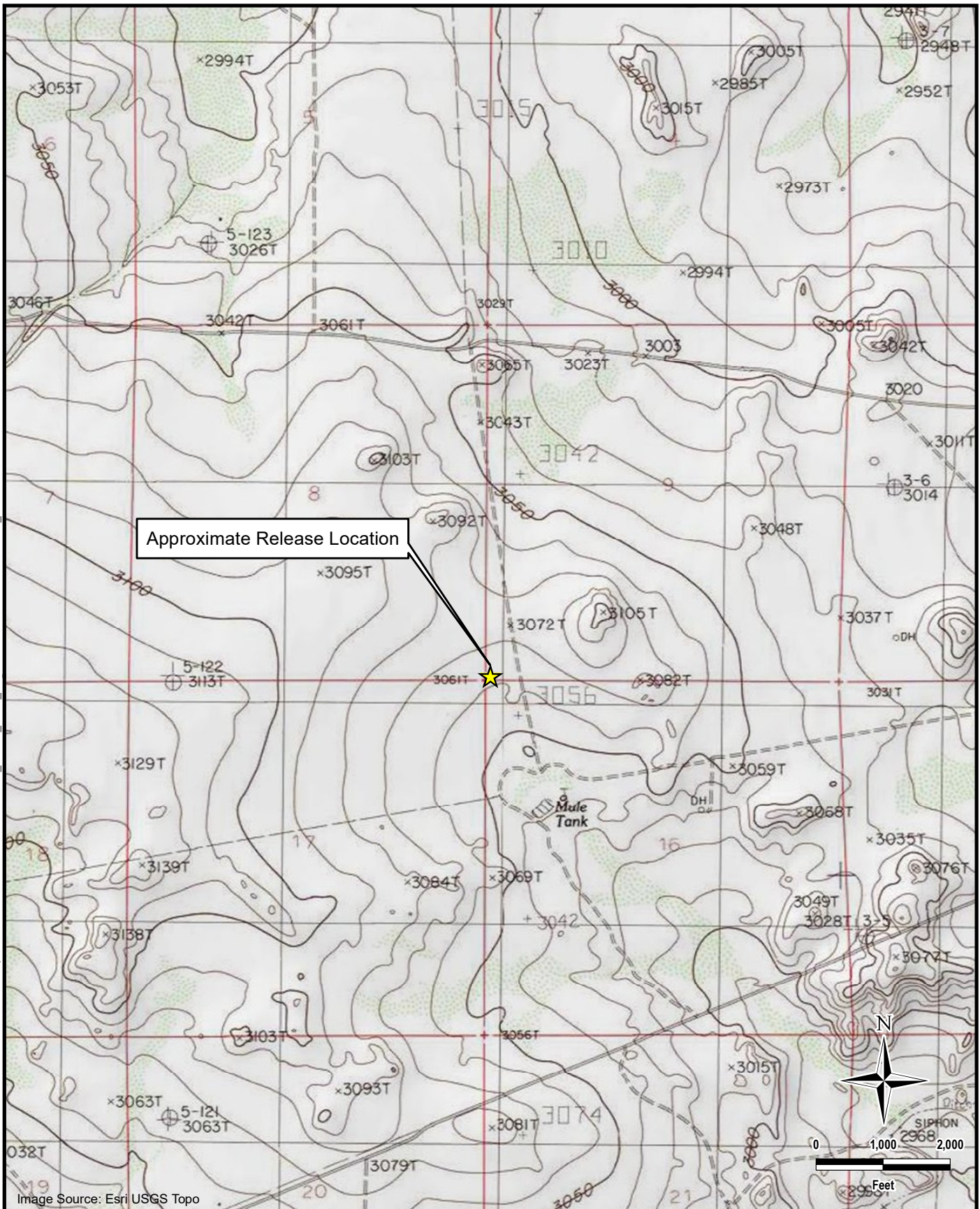
Appendices:

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

FIGURES



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**TETRA TECH**

www.tetrattech.com

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

CONOCOPHILLIPS

NAB1730649817 - 2RP-4468
EDDY COUNTY, NEW MEXICO
(32.04957°, -104.10095°)

**SRO STATE COM #018H RELEASES
TOPOGRAPHIC MAP**

PROJECT NO.: 212C-MD-02826

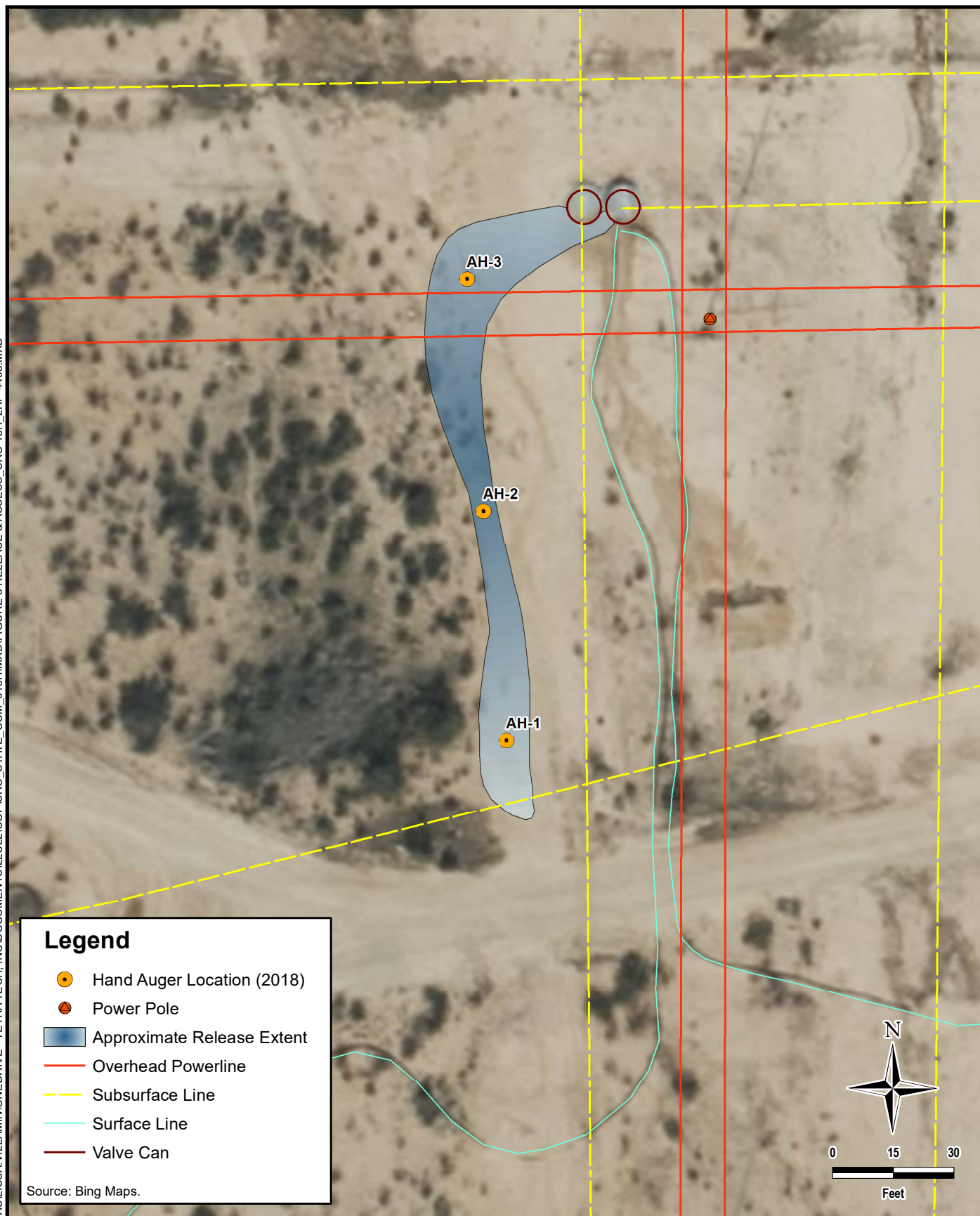
DATE: OCTOBER 16, 2023

DESIGNED BY: LMV

Figure No.

2

DOCUMENT PATH: C:\USERS\LISSA.VILLAMINIONEDRIVE - TETRA TECH\INC\DOCUMENTS\ILLUICOPISRO_STATE_COM_018HMXD\FIGURE 3 RELEASE & ASSESS_SRO 18H_2RP-4468.MXD



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CONOCOPHILLIPS

NAB1730649817 - 2RP-4468
EDDY COUNTY, NEW MEXICO
(32.04957°, -104.10095°)

**SRO STATE COM #018H RELEASES
APPROXIMATE RELEASE EXTENT AND SITE ASSESSMENT**

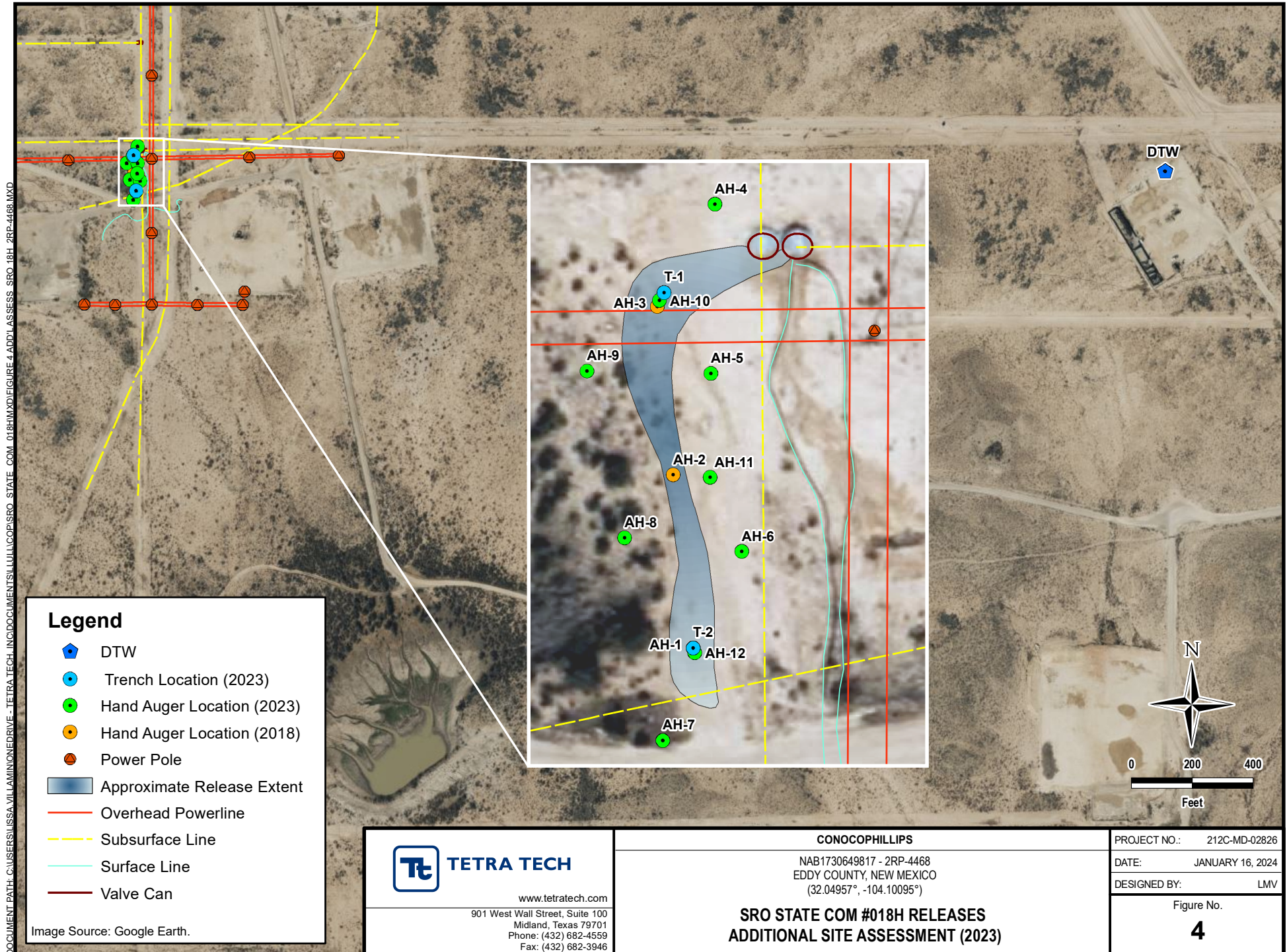
PROJECT NO.: 212C-MD-02826

DATE: NOVEMBER 09, 2023

DESIGNED BY: LMV

Figure No.

3



TABLES

TABLE 1
SUMMARY OF ANALYTICAL RESULTS
2018 SOIL ASSESSMENT - nAB1730649817
CONOCOPHILLIPS
SRO STATE COM #018H
EDDY COUNTY, NM

Sample ID	Sample Date	Sample Depth	Chloride ¹		BTEx ²														TPH ³							
					Benzene		Toluene		Ethylbenzene		m,p-Xylenes		o-Xylene		Total Xylenes		Total BTEx		GRO		DRO		MRO		Total TPH	
		ft. bgs	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	mg/kg			
AH-1	2/13/2018	0-1	1,780		<0.00201		<0.00201		<0.00201		<0.00402		<0.00201		<0.00201		<15.0		<15.0		NA		-			
		1-1.5	1,530		NA		NA		NA		NA		NA		NA		NA		NA		NA		-			
AH-2	2/13/2023	0-1	172		<0.00199		<0.00199		<0.00199		<0.00398		<0.00199		<0.00199		<15.0		<15.0		NA		-			
		1-1.5	190		NA		NA		NA		NA		NA		NA		NA		NA		NA		-			
AH-3	2/13/2023	0-1	4,080		<0.00200		<0.00200		<0.00200		<0.00399		<0.00200		<0.00200		<15.0		62.8		NA		62.8			
		1-1.5	767		NA		NA		NA		NA		NA		NA		NA		NA		NA		-			
		1.5-2	651		NA		NA		NA		NA		NA		NA		NA		NA		NA		-			

NOTES:

ft. Feet

bgs Below ground surface

mg/kg Milligrams per kilogram

TPH Total Petroleum Hydrocarbons

GRO Gasoline range organics

DRO Diesel range organics

MRO Motor Oil range organics

NS Sample not analyzed for parameter

1 EPA Method 300.0

2 EPA Method 8021B

3 Method SW8015 Mod

NA Sample not analyzed for constituent

TABLE 2
SUMMARY OF ANALYTICAL RESULTS
2023 ADDITIONAL SOIL ASSESSMENT - nAB1730649817
CONOCOPHILLIPS
SRO STATE COM #018H
EDDY COUNTY, NM

Sample ID	Sample Date	Sample Depth	Chloride ¹		BTEX ²										TPH ³							
					Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO		DRO		MRO		Total TPH	
		ft. bgs	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	
AH-4	10/24/2023	0-1	32.0		<0.050		<0.050		<<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
AH-5	10/24/2023	0-1	16.0		<0.050		<0.050		<<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
AH-6	10/24/2023	0-1	<16.0		<0.050		<0.050		<<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
AH-7	10/24/2023	0-1	<16.0		<0.050		<0.050		<<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
AH-8	10/24/2023	0-1	<16.0		<0.050		<0.050		<<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
AH-9	10/24/2023	0-1	<16.0		<0.050		<0.050		<<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
AH-10	10/24/2023	0-1	384		<0.050		<0.050		<<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		1-2	560		<0.050		<0.050		<<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
T-1	12/18/2023	2-3	112		<0.050		<0.050		<<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
AH-11	10/24/2023	0-1	32.0		<0.050		<0.050		<<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
AH-12	10/24/2023	0-1	16.0		<0.050		<0.050		<<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
T-2	12/18/2023	1.5-2	80.0		<0.050		<0.050		<<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		2-3	80.0		<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
- MRO Motor Oil range organics
- NS Sample not analyzed for parameter
- 1 EPA Method 300.0
- 2 SM4500 Cl-B
- 3 Method SW8015 Mod
- NA Sample not analyzed for constituent

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

Shaded rows indicate intervals proposed for excavation.

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

Form C-141
Revised April 3, 2017

Submit 1 Copy to appropriate District Office in
accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

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: SRO State Com #018H	Facility Type: Tank Battery

Surface Owner: State	Mineral Owner: State	API No. 30-015-39999
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LOCATION OF RELEASE

Unit Letter A	Section 17	Township 26S	Range 28E	Feet from the 330	North/South Line North	Feet from the 330	East/West Line East	County Eddy
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Latitude: 32.049943 Longitude: -104.100937 NAD83

NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: 20bbls	Volume Recovered: 0bbls
Source of Release: Flowline	Date and Hour of Occurrence: 10/27/2017	Date and Hour of Discovery 10/27/2017 2:35pm
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.*

This released was caused by a hole in the poly flowline before the valve at the trunk line header. The flowline was inspected and repaired.

Describe Area Affected and Cleanup Action Taken.*

The release occurred in the pasture at the connection point of the main trunk line ROW. A vacuum truck was dispatched to remove any 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: 	OIL CONSERVATION DIVISION		
Printed Name: Aaron Lieb	Approved by Environmental Specialist:		
Title: Senior HSE Coordinator	Approval Date:	Expiration Date:	
E-mail Address: alieb@concho.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 11-02-2017	Phone: 575-748-1553		

* Attach Additional Sheets If Necessary

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	

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

Regulatory Correspondence



Stephanie Garcia Richard
COMMISSIONER

State of New Mexico
Commissioner of Public Lands

310 OLD SANTA FE TRAIL
P.O. BOX 1148
SANTA FE, NEW MEXICO 87504-1148

COMMISSIONER'S OFFICE
Phone (505) 827-5760
Fax (505) 827-5766
www.nmstatelands.org

October 23, 2023

COG Operating, LLC
2208 West Main Street
Artesia, NM 88210

Attn: Monti Sanders

Re: Right-of-Entry Permit No.: **RE-6733/SRO State Com #18H**

Dear Applicant:

Enclosed is the completed captioned Right-of-Entry permit. If any corrections are necessary, please let us know and we will retype or amend this permit as necessary.

Please see the attached conservation memorandum for conservation measures.

The New Mexico State Land Office requires you to notify any surface lessees that will be impacted by your project prior to construction.

If you have any questions, or if we may be of further assistance, please do not hesitate to contact Amy Velazquez of my staff at (505) 827-5789.

Sincerely,


James S. Bordegaray
Director, Commercial Resources Division

JSB/alv



NEW MEXICO STATE LAND OFFICE
 Commissioner of Public Lands
 Stephanie Garcia Richard
 New Mexico State Land Office Building
 P.O. Box 1148, Santa Fe, NM 87504-1148

**RIGHT OF ENTRY PERMIT
 CONTRACT NO. RE – 6733**

This Agreement is made and entered into between the COMMISSIONER OF PUBLIC LANDS (the "Commissioner") and

COG Operating LLC
 2208 West Main Street
 Artesia, NM 88210

("Permittee"). The parties agree as follows:

1. RIGHT OF ENTRY ("ROE")

The Commissioner grants to Permittee, and its authorized representatives, employees, and contractors, permission to use the state trust lands identified below (the "Premises"), and ingress and egress to the Premises, for the sole purposes of (1) surveying/conducting an environmental investigation due to a produced water release on or adjacent to the site of the SRO State Com #18H (Incident ID # 2RP-4468) and (2) conducting surface reclamation activities, including removal of equipment and debris, and any required remediation per 19.15.29.12 NMAC.

The Premises are situated in the following location in Eddy County, New Mexico::

Section	Township	Range	Subdivision	County	Longitude/Latitude
17	26S	28E	NW4NW4	Eddy	32.004957,-104.10095

2. TERM AND TERMINATION

Right of entry is granted for a term of **180 days**, commencing on the execution date of this document by the Commissioner of Public Lands.

3. FEES

\$ 50.00 Application Fee
 \$ 500.00 Permit Fee
 \$ 550.00 Total Fee

RE-6733

4. CONDITIONS OF USE

- A. The issuance of this ROE does not guarantee that any subsequent lease, permit, or any other instrument will be issued to Permittee for the Premises.
- B. No blading or widening of any roads that provide access to the Premises is permitted under this ROE.
- C. No sale of any material extracted from the Premises is allowed under this ROE.
- D. Permittee shall observe all applicable federal, state, and local laws and regulations.
- E. Permittee shall take all reasonable precautions to prevent and suppress forest, brush, and grass fires and prevent pollution of waters on or in the vicinity of the Premises.
- F. Permittee shall not block or disrupt roads or trails commonly in use.
- G. This ROE is subject to any and all easements and rights-of-way previously granted and now in force and effect.
- H. Permittee shall be responsible for repair and restitution for damage to any Premises or improvements as a result of activities related to the ROE.
- I. Prior to entering the Premises, Permittee must identify and contact any existing surface lessees. The grant of this ROE does not allow access across private lands.
- J. Permittee may utilize this ROE upon its execution for inspection of the Premises and to conduct any necessary tests or inspections. Permittee may not conduct remediation or reclamation work until it has submitted a written plan for such work, and received State Land Office approval.
- K. Personnel present on Premises: **ConocoPhillips personnel and contractors.**
- L. Equipment and materials present on Premises: **Vehicles, heavy equipment, and associated materials.**

5. SITE CONDITIONS

- A. No surface disturbance, other than soil tests, except as described in a reclamation plan submitted to and approved by the State Land Office.
- B. Access to the Premises shall be over existing roads.
- C. The natural environmental conditions that exist contemporaneously with this grant of ROE shall be preserved and protected. Permittee must follow all applicable environmental and cultural resource protection laws and regulations.

6. INDEMNITY

Permittee shall save, hold harmless, indemnify, and defend the State of New Mexico, the Commissioner and Commissioner's employees, agents and contractors, in both their official and individual capacities, from any and all liability, claims, losses, damages, or expenses of any character or nature whatsoever, including but not limited to attorney's fees, court costs, loss of land value or use, third party claims, penalties, or removal, remedial or restoration costs arising out of, or alleged to arise out of Permittee's operations or presence on the Premises (or operations or presence of his representatives, employees, or contractors).

7. SURVIVAL OF TERMS

Permittee's obligations regarding indemnity, site conditions, and compliance with applicable standards and laws, shall survive the termination, cancellation or relinquishment of this Agreement, and any cause of action of the Commissioner to enforce any right, liability, claim, loss, damage or expense under those paragraphs shall not be deemed to accrue until the Commissioner's actual discovery of said right, liability, claim, loss, damage or expense.

8. NOTIFICATION

Permittee must notify the State Land Office immediately in the event Permittee or his representatives, employees, or contractors observe any spill, fire, or other emergency on the Premises, or if Permittee or his representatives, employees, or contractors experience any serious injury while on the Premises.

RE-6733

WITNESS the hands of PERMITTEE and COMMISSIONER on the day(s) and year entered below.

Ry D. Owen
PERMITTEE SIGNATURE *CHC*
AK

DATE: 10/19/23

Ryan D. Owen

Attorney-in-fact, COG Operating LLC

PERMITTEE NAME AND TITLE (PRINT)

SEAL:

BY: Stephanie Garcia Richard
Stephanie Garcia Richard
Commissioner of Public Lands

DATE: 10/23/2023

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 3 2 2 8

Registration

Lead Agency: New Mexico State Land Office

Performing Agency: SWCA Environmental Consultants

Activity ID: 81946

Performing Agency Report No: 23-410

Report Recipient (Your Client): Tetra Tech

- Activity Types:
- ☐ Research Design
 - ☒ Archaeological Survey/Inventory
 - ☐ Architectural Survey/Inventory
 - ☐ Test Excavation
 - ☐ Monitoring
 - ☐ Collections/Non-Field Study
 - ☐ Compliance Decision
 - ☐ Literature Review Overview
 - ☐ Excavation
 - ☐ Ethnographic Study
 - ☐ Resource/Property Visit
 - ☐ Historic Structures Report
 - ☐ Other:

Total Survey Acreage: 0.05

Total Tribal Acreage: 0.00

Total Resources Visited: 0

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 3 2 2 8

Associate/Register Resources

Prefix	Number	Field Site/Other Number	In GIS	Resource Type	Collections Made?	Revisit
			✓		<input type="checkbox"/>	

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 3 2 2 8

Report Details

Lead Agency

Lead Agency: New Mexico State Land Office

Lead Agency Report No.

Report Number: _____

Title of Report

Title of Report: A Cultural Resources Survey of the SRO State Com #18H Release Project in Eddy County, New Mexico

Authors: Paisley DeFreese

Type of Report

Publication Type: Report, Monograph, or Book Negative

Description of Undertaking (what does the project entail?)

Description: Tetra Tech contracted SWCA Environmental Consultants (SWCA) to conduct an intensive cultural resources pedestrian survey in support of the SRO State Com #18H Release project in Eddy County, New Mexico. The proposed project consists of clean up efforts for the release including excavation of affected soil and back fill with clean soil and is approximately 19.58 kilometers (12.16 miles) southwest of Malaga, New Mexico on lands managed by the New Mexico State Land Office (SLO). The SLO will serve as the lead agency.

Tetra Tech is proposing to excavate and back fill two inadvertent releases surrounding two valve cans at the spill location. The proposed survey area is based on a 200 ft buffer around the provided center point (32.049752°, -104.100954). The project is completely on SLO land. Tetra Tech sent a site monitor to survey with SWCA as part of their standard safety protocol.

Dates of Investigation

From: 06/15/2023 To: 06/15/2023

Report Date

Report Date: 06/22/2023

Performing Agency/Consultant

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 3 2 2 8

Name: SWCA Environmental Consultants
Principal Investigator: Alissa K. Healy
Field Supervisor: Thea Stehlik-Barry
Field Personnel Names: N/A
Historian/Other: N/A

Report Details

Performing Agency Report Number

Report Number: 23-410

Client/Customer (project proponent)

Name: Tetra Tech
Contact: Steve Jester
1500 City West, #1000
Address: Houston, TX 77042
Phone: (713) 806-8871

Client/Customer Project Number

Project Number: 81946

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 3 2 2 8

Ownership & Location

Land Ownership Status (Must be indicated on Project Map)

Land Ownership:

Land Owner/Manager	Protocol	Acres Surveyed	Acres in APE
NM SLO		0.05	0.05

Total Survey Acreage: 0.05

Total Tribal Acreage: 0.00

Record Search(es)

Date of HPD/ARMS File Review: 7-June-2023

Date of Other Agency File Review: 7-June-2023

Survey Data

Source Graphics: NAD 83
✓ USGS 7.5' (1:24,000) topo map ☐ Other Topo Map Scale:
✓ GPS Unit
☐ Aerial Photos ☐ Other Source Graphic(s):

The following tables (b,c,& e) are calculated by the NMCRIS Map Service

USGS 7.5' Topographic Map(s)

Map Name	USGS Quad Code
Red Bluff	32104-A1

County(ies)

County	FIPS
Eddy	

Legal Description

Unplatted	Township (N/S)	Range (E/W)	Section
	T26S	R28E	8
	T26S	R28E	17

Projected Legal Description

Nearest City or Town: Malaga

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 3 2 2 8

GIS

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NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 3 2 2 8

Methodology

Survey Field Methods

Intensity: 100% coverage

Configuration: ☒ Block Survey Units ☐ Linear Survey Units (l x y)

Other Survey Units

Scope: Non-Selective

Coverage Method: ☒ Systematic Pedestrian Coverage **Other Method:** _____

Survey Interval (m): 15 **Crew Size:** 1

Fieldwork Dates: From: 06/15/2023 **To:** 06/15/2023

Survey Person Hours: 0.5 **Recording Person Hours:** 0

Additional Narrative: A Tetra Tech monitor was present during SWCA's cultural resources survey. NMCRIS 139403 (11/4/17) is a previously qualifying survey used to reduce the survey area.

Environmental Setting (NRCS soil designation; vegetative community; elevation; etc.)

Environmental Setting:

The project area falls within the Chihuahuan Basins and Playas (24a) ecoregion. This ecoregion includes alluvial fans, internally drained basins, and river valleys mostly below 4,500 feet in elevation (Griffith et al. 2006). The elevation of the project area is 934.03 m (3,064 feet) above mean sea level. This ecoregion is composed of desert grasses and shrub land in erosional settings. This project is within the shrub land setting. Typical vegetation includes creosote bush, tarbush, yuccas, sandsage, viscid acacia, tasajillo, lechuguilla, mesquite, and ceniza. (Griffith et al. 2006). Wildlife in the area includes mule deer, prairie dog, gopher, fox, coyote, skunk, black-tailed jackrabbit, desert cottontail, scaled quail, burrowing owl, mourning dove, wrens, various hawks, bull snake, prairie rattlesnake, plain hognose snake, western hooknose snake and numerous lizards (Biota Information System of New Mexico 2023; Brown 1994). Important animal species prehistorically include deer, jackrabbit, and cottontail.

Geology underlying the project area comprises Holocene to middle Pleistocene eolian deposits ([Qe] [U.S. Geological Survey 2023]). One soil is present within the project area: Reagan-Upton association, 0 to 9 percent slopes, are well drained, with a low runoff class (Natural Resources Conservation Service 2023).

Weather data for the survey area was compiled using the Carlsbad Caverns, New Mexico (291480), climate station data (period of record February 1, 1930, to June 6, 2016). Rainfall in the survey area can occur year-round but is most abundant from May through October. During that time period, rainfall totals 30.1 cm (11.9 inches), with an average of 5.0 cm (1.98 inches) per month for those months; September has the heaviest average precipitation. Snowfall is heaviest during December at 5.6 cm (2.2 inches) and can fall between October and March. Temperatures are coldest in December and January at 0.8

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 3 2 2 8

degree Celsius (33.6 degrees Fahrenheit) and warmest in June at 32.8 degrees Celsius (91.1 degrees Fahrenheit) (Western Regional Climate Center 2023).

Biota Information System of New Mexico

2023 Database Query for Eddy County. Available at: <http://www.bison-m.org/>. Accessed June 2023.

Griffith, G. E., J. M. Omernik, M. M. McGraw, G. Z. Jacobi, C. M. Canavan, T. S.

Schrader, D. Mercer, R. Hill, and B. C. Moran

2006 Ecoregions of New Mexico. Color poster with map, descriptive text, summary tables, and photographs. Map scale 1:1,100,000. U.S. Geological Survey, Reston, Virginia.

Natural Resources Conservation Service

2023 Web Soil Survey of Eddy County, New Mexico. Available at: <http://websoilsurvey.nrcs.usda.gov/app/>. Accessed June 2023.

Western Regional Climate Center

2023 Climate Summary for Carlsbad Caverns Climate Station (291480). Available at: <https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?nm1480>. Accessed June 2023

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 3 2 2 8

Methodology

Percent Ground Visibility

Ground Visibility:76-99 %**Condition of Survey Area:**

The survey area had minimal disturbances from wind and water processes, modern trash on the south end, no significant animal burrows or evidence of cattle grazing. An overhead transmission line is present, however, there are no poles within survey area. The surrounding area is heavily disturbed with access roads, buried pipelines, surface flow lines, well pads, and transmission lines in close proximity.

Attachments (check all appropriate boxes)

- ✓ USGS 7.5 Topographic Map with sites, isolates, and survey area clearly drawn (required)
- ✓ Copy of NMCRIS Map Check (required)
- ☐ LA Site Forms – new sites (with sketch map & topographic map) if applicable
- ☐ LA Site Forms (update) – previously recorded & un0relocated sites (first 2 pages minimum)
- ☐ List and Description of Isolates, if applicable
- ☐ List and Description of Collections, if applicable

Other Attachments

- ✓ Photographs and Log

☐ Other attachments **Describe:** _____

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 3 2 2 8

Cultural Resource Findings

Investigation Results

Archaeological Sites Discovered and Registered: 0

Archaeological Sites Discovered and NOT Registered: 0

Previously Recorded Archaeological Sites Revisited (site update form required): 0

Previously Recorded Archaeological Sites Not Relocated (site update form required): 0

Total Archaeological Sites (visited & recorded): 0

Total Isolates Recorded: 0

✓ Non-Selective Isolate Recording

HCPI Properties Discovered and Registered: 0

HCPI Properties Discovered And NOT Registered: 0

Previously Recorded HCPI Properties Revisited: 0

Previously Recorded HCPI Properties NOT Relocated: 0

Total HCPI Properties (visited & recorded, including acequias): 0

If No Cultural Resources Found, Discuss Why: 0

Management Summary

SWCA surveyed a 60.96-m (200-feet) buffer around the proposed project center point for a total survey area of 28.84 acres (11.67 hectares). NMCRIS 139403 is a previously qualifying survey used to reduce the survey area to a total of 0.05 acres (0.02 hectares). No archaeological sites or historic cultural properties (buildings, structures, or objects) or isolated occurrences were observed. This is likely due to the small survey area in addition to the previous surveys around the project also finding no cultural materials.

Summary: SLO cultural resources preservation efforts requires that an archaeological survey be conducted to current standards for the APE pursuant to and in compliance with New Mexico Administrative Code (NMAC) 4.10.15 to ensure that cultural properties are not inadvertently excavated, harmed, or destroyed by any person. SWCA recommends that the proposed project will have no effect on any cultural resources listed or eligible for listing in the New Mexico State Register of Cultural Properties or the National Register of Historic Places. However, if buried cultural deposits are discovered during project construction, work should cease immediately, and the New Mexico SLO and State Historic Preservation Officer should be contacted

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 3 2 2 8

Attachments

Documents:

Attachment Type	Description	Name	File Type	Size	Upload Date	Upload By
Report/Manuscript	NMCRIS_153228 NIAF	NMCRIS_153228	PDF Document	6,087KB	22-June-2023	Paisley DeFreese

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 3 2 2 8

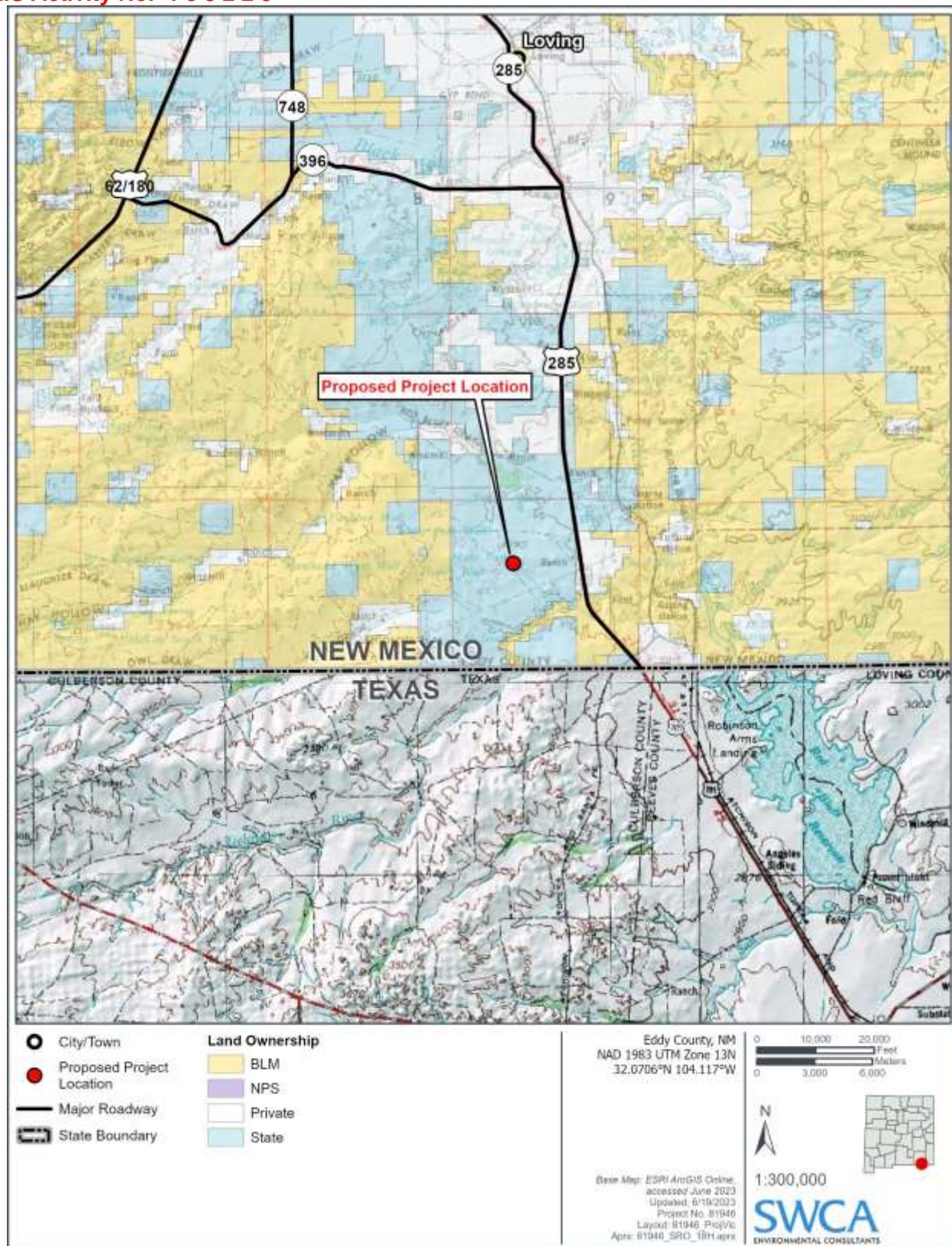


Figure 1. Project vicinity map.

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 3 2 2 8

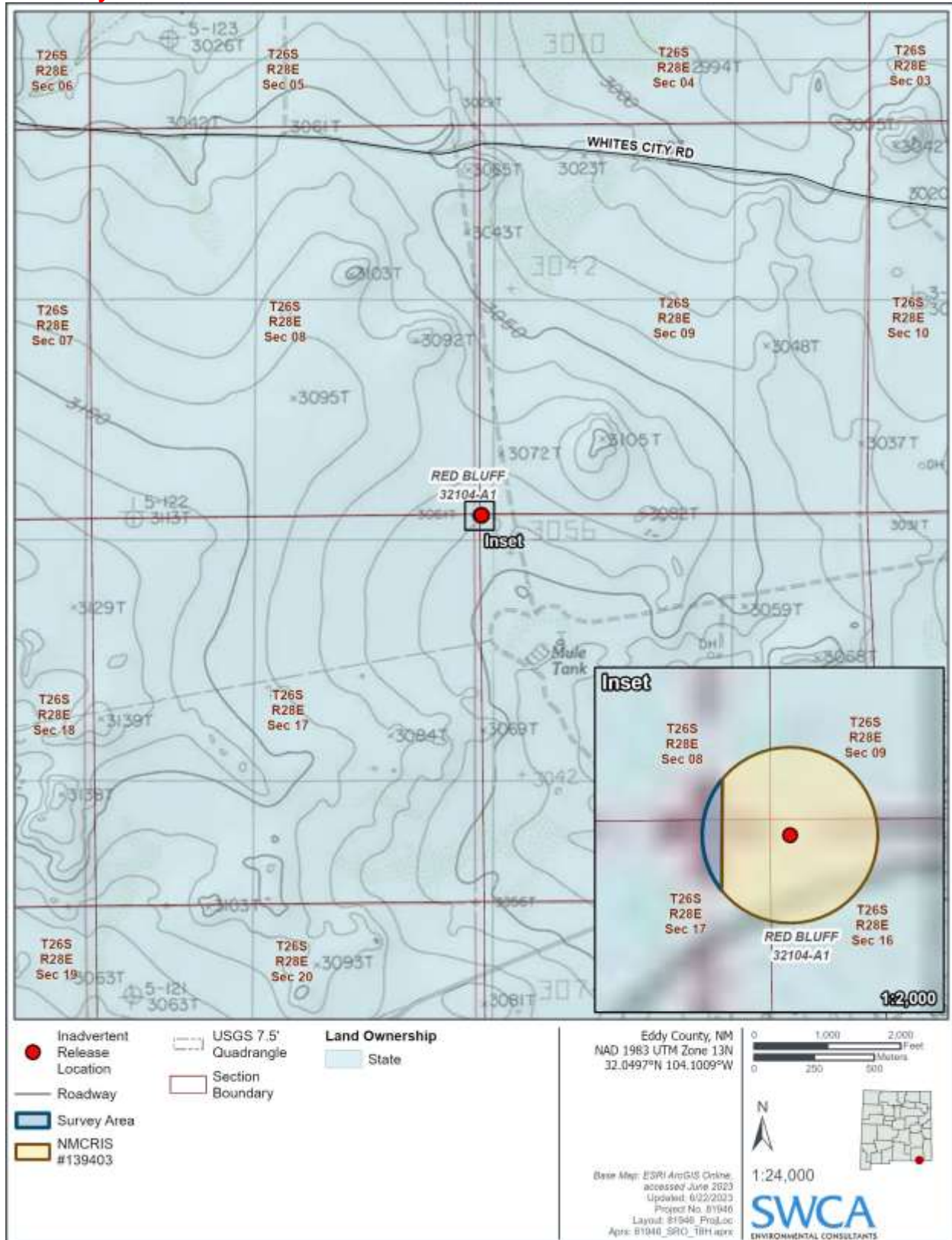


Figure 2. Project location map.

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 3 2 2 8



Figure 3. Project overview, facing north (Frame -0716).



Figure 4. Project overview, facing south (Frame -1909).

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 3 2 2 8



Figure 5. Project overview, facing east (Frame -9561).



Figure 6. Project overview, facing west (Frame -9638).

NMCRIS Investigation Abstract Form (NIAF)

NMCRIS Activity No. 1 5 3 2 2 8

Table 1. Previously Known Cultural Resources within 500 m (0.31 mile) of the Project Area

*Redacted

Table 2. Previously Completed Cultural Resource Surveys within 500 m (0.31 mile) of the Project Area

NMCRIS No.	Performing Agency	Date	Acres	Resources Recorded
121605	Boone Arch Svcs of NM	7/23/2011	144.87	2
132233	Statistical Research, Inc.	7/8/2014	9528.07	79
137894	Boone Archaeological Consultants, LLC.	4/13/2017	41.23	0
139403	Lone Mountain Archaeological Services	11/4/2017	487.19	10

*Redacted

Figure 7. ARMS screenshot with the survey area shown with a blue polygon and previous surveys displayed with orange and brown polygons.

Poole, Nicholas

From: Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>
Sent: Tuesday, October 10, 2023 11:13 AM
To: Carroll, Ryan
Cc: Tavarez, Ike; Llull, Christian
Subject: RE: [EXTERNAL] Depth to Groundwater Determination Request - Incident IDs: nAB1730649817 and nAB1719137895 (SRO State Com #018H)

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

Ryan,

The Spill Rule Clarifications states "If the operator has applicable information which does not meet the above preference, we will review it on a case-by-case basis to determine if it is acceptable."

The attached groundwater determination for the site is acceptable to the OCD for the SRO State Com #018H releases.

If the workplans will not be implemented as written, new workplans pursuant to 19.15.29 NMAC will need to be submitted with timelines and meet all applicable regulatory agency requirements.

Please let me know if you have any questions or require additional information.

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: Carroll, Ryan <RYAN.CARROLL@tetrattech.com>
Sent: Friday, October 6, 2023 12:45 PM
To: Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>
Cc: Tavarez, Ike <Ike.Tavarez@conocophillips.com>; Llull, Christian <Christian.Llull@tetrattech.com>
Subject: [EXTERNAL] Depth to Groundwater Determination Request - Incident IDs: nAB1730649817 and nAB1719137895 (SRO State Com #018H)

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

Hi Brittany,

We have identified a borehole that was drilled at a nearby site and would like to request a review by OCD to determine if it is acceptable to utilize this borehole to determine depth to groundwater at SRO State Com 18H.

The attached log is a depth to water determination borehole, which was drilled on March 1, 2023 at the Graham Cracker 16 State site. It is located approximately 0.6 miles east of SRO State 18H. The borehole coordinates are: 32.049763°, -104.090109°.

The coordinates for the SRO State releases are noted below:

nAB1730649817: 32.04999°, -104.101°
nAB1719137895: 32.049943°, -104.100937°

Additionally, if the OCD does accept this groundwater determination borehole, we would like to get clarification on how to proceed. We have approved work plans, however, one of the work plans proposed a liner and the NMSLO would not approve the liner. With a groundwater determination between 51-100 feet, a liner will no longer be necessary, and we could implement the remediation to the applicable soil closure criteria for both releases. Could we proceed with the remediation, assuming no approval issues with NMSLO since a liner would not be needed, or would we need to submit revised work plans?

Please let me know if you have any questions or need additional information.

Thanks, Ryan

Ryan Carroll | Senior Project Manager | Tetra Tech
Direct (832) 251-5161 | Mobile (617) 461-3533

Incident ID	2RP-4468
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: Ike TavarezTitle: Senior HSE SupervisorSignature: Date: 11/8/2018email: itavarez@concho.comTelephone: (432) 685-2573**OCD Only**Received by: Jocelyn HarimonDate: 11/02/2022

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

Signature: Date: 11/29/2022

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS

Action 155452

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 155452
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
bhall	Remediation and closure must comply with 19.15.29.12 and 19.15.29.13 NMAC. Horizontal delineation will need to be completed during confirmation sampling. Confirmation samples of all side walls and bases must be representative of no more than 200 square feet.	11/29/2022

Poole, Nicholas

From: Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>
Sent: Thursday, September 21, 2023 8:56 AM
To: Carroll, Ryan
Cc: Rodgers, Scott, EMNRD; Bratcher, Michael, EMNRD; Llull, Christian
Subject: RE: [EXTERNAL] Extension Request - nAB1730649817 and nAB1719137895 (SRO State Com #018H)

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

Ryan,
The extension request for incident numbers nAB1730649817 and nAB1719137895 is approved. The new due date is December 20, 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.

Can you provide the reasons that the NMSLO did not approve the remediation work plan?

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: Carroll, Ryan <RYAN.CARROLL@tetrattech.com>
Sent: Wednesday, September 20, 2023 3:28 PM
To: Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>
Cc: Llull, Christian <Christian.Llull@tetrattech.com>
Subject: [EXTERNAL] Extension Request - nAB1730649817 and nAB1719137895 (SRO State Com #018H)

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

To Whom It May Concern,

On behalf of ConocoPhillips, Tetra Tech is requesting a 90-day extension (until December 20, 2023) to complete additional assessment activities and associated reporting for the SRO State #018H release sites (**nAB1730649817** and **nAB1719137895**). The releases were discovered on July 4, 2017, and October 27, 2017, respectively. A Delineation Work Plan was submitted to the New Mexico Oil Conservation Commission (NMOCD) on November 2, 2017, and the Work Plan was resubmitted on November 1, 2022. The NMOCD responded on November 29, 2022, stating that horizontal delineation will need to be completed during confirmation sampling and confirmation samples of all side walls and bases must be representative of no more than 200 square feet.

The release footprint is located on State Trust lands, and the NMSLO did not approve the remediation work plan that was previously approved by the NMOCD, which may require additional assessment to complete a revised Work Plan. Additionally, the New Mexico State Land Office has recently begun enforcing application and permitting requirements for Water/Soil Boring Exploration Permits, Right of Entry and Cultural Surveys (per Rules 10, 12 and 24), and must be

permitted through the Water Bureau, Oil, Gas, and Minerals Division and/or Commercial Resources Division of New Mexico State Land Office.

Tetra Tech and ConocoPhillips experienced a delay implementing response actions for the SRO State #018H Releases due to NMSLO work plan rejection and in order to comply with these permitting rules. The allocation of resources required to complete the permitting process are demanding and require additional time for coordination with regulatory personnel. We have identified a depth to water boring location that appears to be close enough to the site to utilize for determining depth to groundwater. Additionally, we have completed the cultural resources survey (attached). Tetra Tech and ConocoPhillips are prepared to initiate additional assessment activities, as needed, and submit a revised Work Plan once we obtain the right of entry permit.

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



Thank you,

Ryan

Ryan Carroll | Senior Project Manager | Tetra Tech
Direct (832) 251-5161 | Mobile (617) 461-3533

Poole, Nicholas

From: OCDOnline@state.nm.us
Sent: Monday, December 18, 2023 11:13 AM
To: Llull, Christian
Subject: The Oil Conservation Division (OCD) has accepted the application, Application ID: 295619

 **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#) nAB1730649817.

The sampling event is expected to take place:

When: 12/18/2023 @ 11:00

Where: A-17-26S-28E 330 FNL 330 FEL (32.0488815,-104.1021042)

Additional Information: NA

Additional Instructions: NA

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 C

Site Characterization Data



New Mexico Office of the State Engineer

Water Column/Average Depth to Water

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

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

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

(quarters are smallest to largest)

(NAD83 UTM in meters)

(In feet)

POD Number	POD Sub-Code	basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	Distance	Depth Well	Depth Water	Water Column
C 02160 S7	CUB	ED		3	3	1	22	26S	28E	586638	3543998*	2923	300	120	180
C 02479	CUB	ED			4	4	10	26S	28E	587909	3546534*	3046	200		
C 02480	CUB	ED			4	4	10	26S	28E	587909	3546534*	3046	150		
C 02478	CUB	ED			2	1	05	26S	28E	583848	3549325*	3167	100		
C 04022 POD1	CUB	ED		4	4	2	15	26S	28E	588082	3545647	3282	220	175	45
C 02160 S5	CUB	ED		1	1	1	14	26S	28E	588225	3546237*	3356	300	120	180
C 02160 S6	CUB	ED		3	3	1	14	26S	28E	588232	3545635*	3432	300	120	180
C 02481	CUB	ED			1	1	14	26S	28E	588326	3546138*	3461	200		

Average Depth to Water: **133 feet**

Minimum Depth: **120 feet**

Maximum Depth: **175 feet**

Record Count: 8

UTMNA83 Radius Search (in meters):

Easting (X): 584869.88

Northing (Y): 3546326.7

Radius: 3500

*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.

10/12/23 1:08 PM

Page 1 of 1

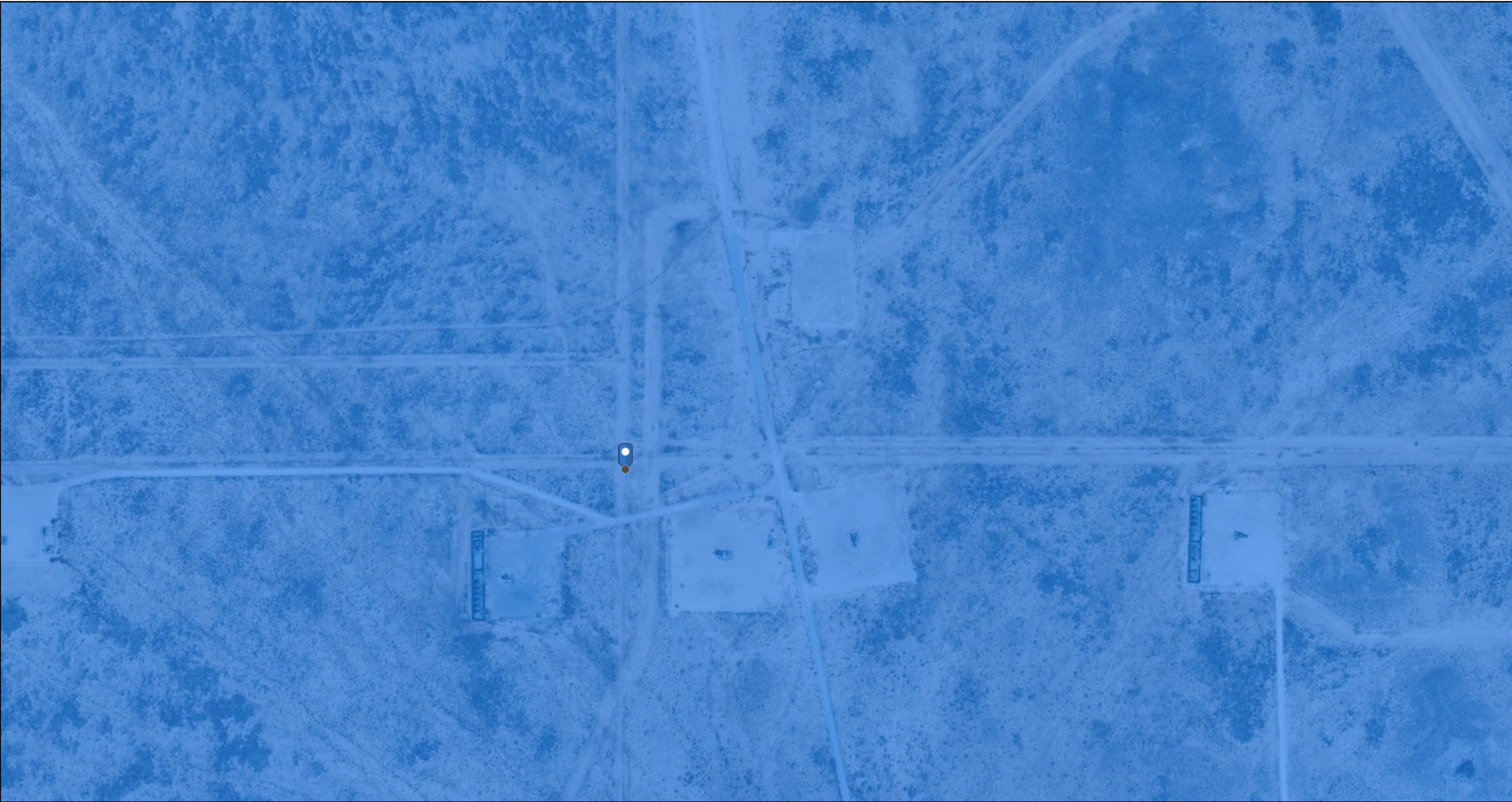
WATER COLUMN/ AVERAGE
DEPTH TO WATER

212C-MD-02989		TETRA TECH		LOG OF BORING DTW				Page 1 of 1	
Project Name: Graham Cracker 16 State #002H									
Borehole Location: GPS Coordinate: 32.049763°, -104.090109°				Surface Elevation: 3058'					
Borehole Number: DTW				Borehole Diameter (in.):		Date Started: 3/1/2023		Date Finished: 3/1/2023	

DEPTH (ft)	OPERATION TYPES	SAMPLE	CHLORIDE CONCENTRATION (ppm)	VOC CONCENTRATION (ppm)	SAMPLE RECOVERY (%)	MOISTURE CONTENT (%)	DRY DENSITY (pcf)	LIQUID LIMIT	PLASTICITY INDEX	MINUS NO. 200 (%)	GRAPHIC LOG	WATER LEVEL OBSERVATIONS		
												While Drilling <u>▽</u> DRY 24 Hours After Completion of Drilling <u>▽</u> DRY		
												Remarks:		
MATERIAL DESCRIPTION												DEPTH (ft)	WELL DIAGRAM	
5												-SC- CLAYEY SAND: Dark brown, loose, dry, fine grained, partially weakly cemented, with trace Caliche	2	
10												-SM- SAND: Light brown, loose, dry, fine grained, with gravel-sized Caliche -- Transitions to with partially weakly cemented Sand pockets	9	
15												-SC- SAND: Light brown to brown, medium dense, dry, fine to medium grained, with loose coarse Sand pockets	34	
20												-SM- SAND: Light brown to brown, loose, dry, fine grained, with partially cemented Clayey Sand pockets	44	
25												-ML- SAND: Light brown, medium dense, dry, very fine to fine grained, with Clayey Sand pockets	49	
30												-SM- SILTY SAND: Light brown, dense, dry, very fine to fine grained, partially cemented, with occasional Clayey Sand seams	55	
35												Bottom of borehole at 55.0 feet.		

Sampler Types: <div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;"> Split Spoon Shelby Bulk Sample Grab Sample </div> <div style="width: 50%;"> Acetate Liner Vane Shear California Test Pit </div> </div>	Operation Types: <div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;"> Hollow Stem Auger Continuous Flight Auger Mud Rotary </div> <div style="width: 50%;"> Auger Air Rotary Direct Push Drive Casing </div> </div>	Notes: Surface elevation is an estimated value from Google Earth data.
Logger: Lee Scarborough	Drilling Equipment: Air Rotary	Driller: Scarborough Drilling

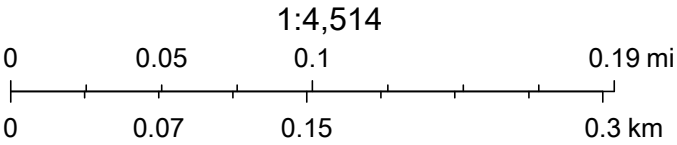
OCD Karst Potential



10/12/2023, 2:00:16 PM

Karst Occurrence Potential

Medium

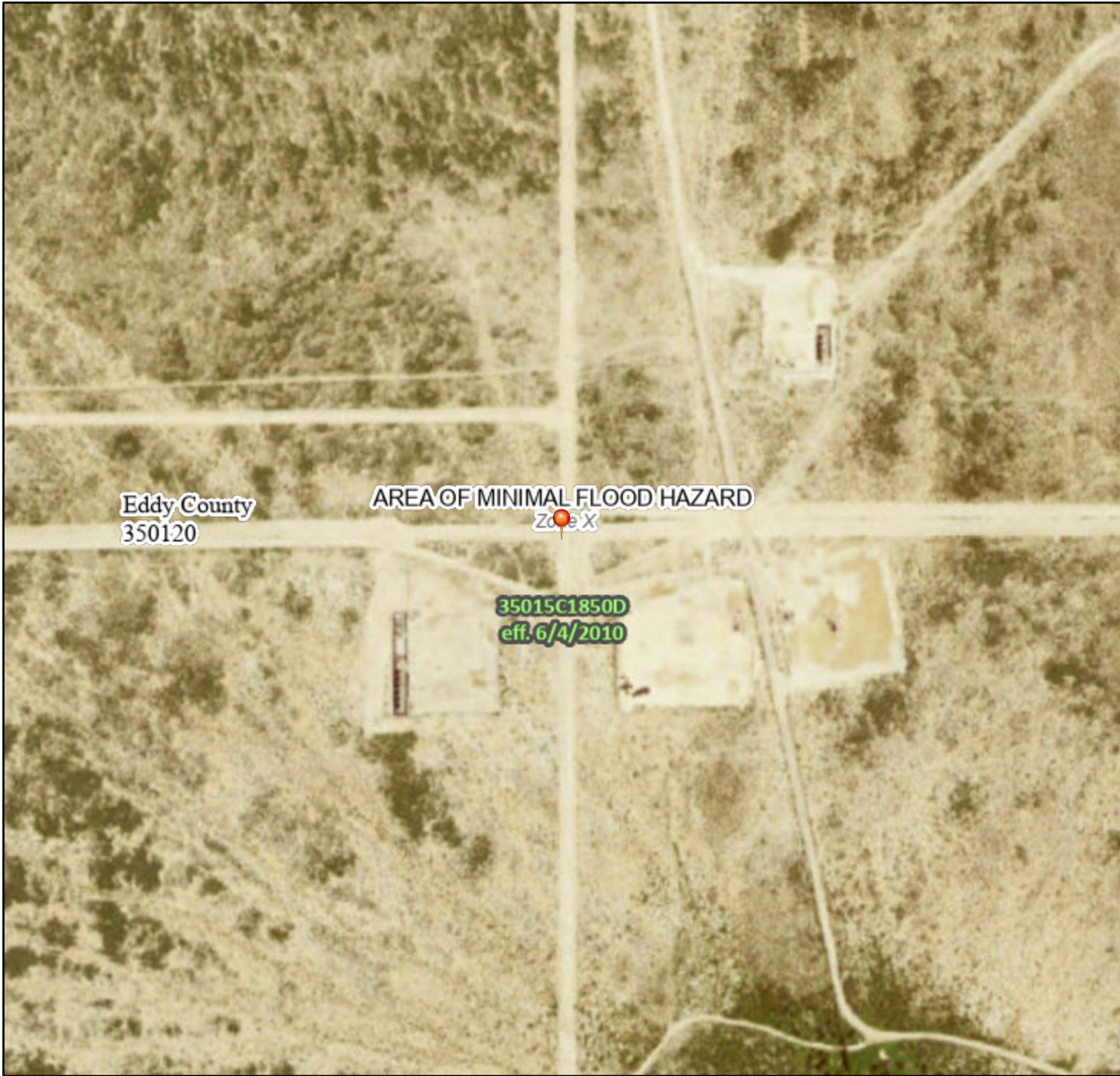


BLM, OCD, New Mexico Tech, Esri, HERE, Garmin, iPC, Maxar

National Flood Hazard Layer FIRMette



104°6'22"W 32°3'15"N



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

1:6,000

104°5'45"W 32°2'45"N

Released to Imaging: 2/15/2024 8:45:45 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 **12/8/2023 at 1:27 PM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

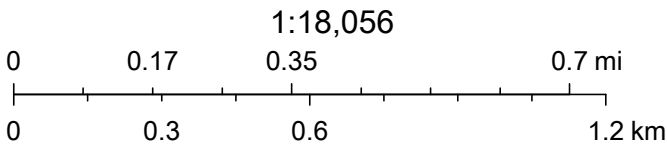
This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

OCD Waterbodies Map



10/12/2023, 2:04:38 PM

- OSW Water Bodys
- OSE Streams




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

OCD Surface Ownership Map



12/8/2023, 12:24:38 PM


Mineral Ownership

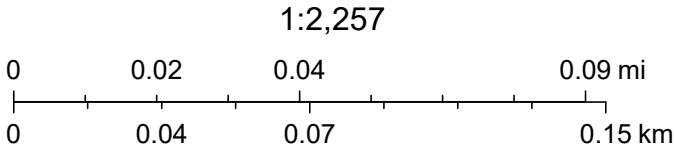
 N-No minerals are owned by the U.S.

 PLSS Second Division

 PLSS First Division

Land Ownership

 S



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

APPENDIX D

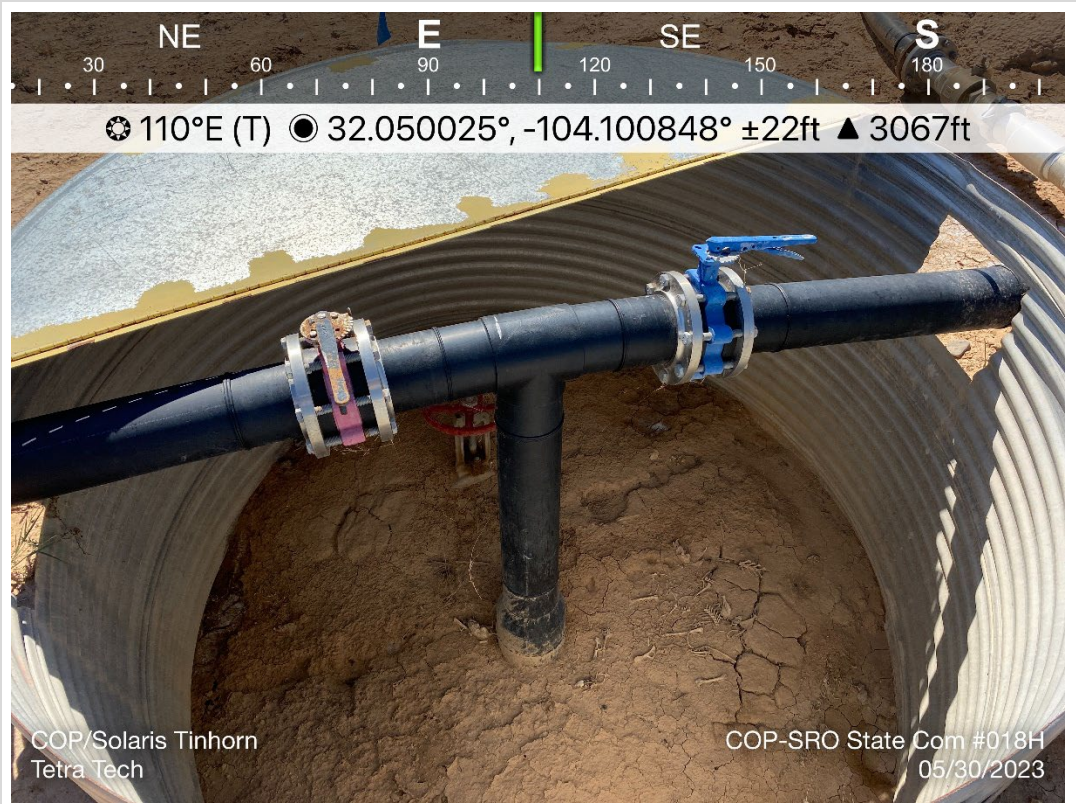
Photographic Documentation



TETRA TECH, INC. PROJECT NO. 212C-MD-02826	DESCRIPTION	Site signage. SRO State Unit #18H and location information	1
	SITE NAME	SRO State Com #018H (nAB1730649817)	9/7/2022



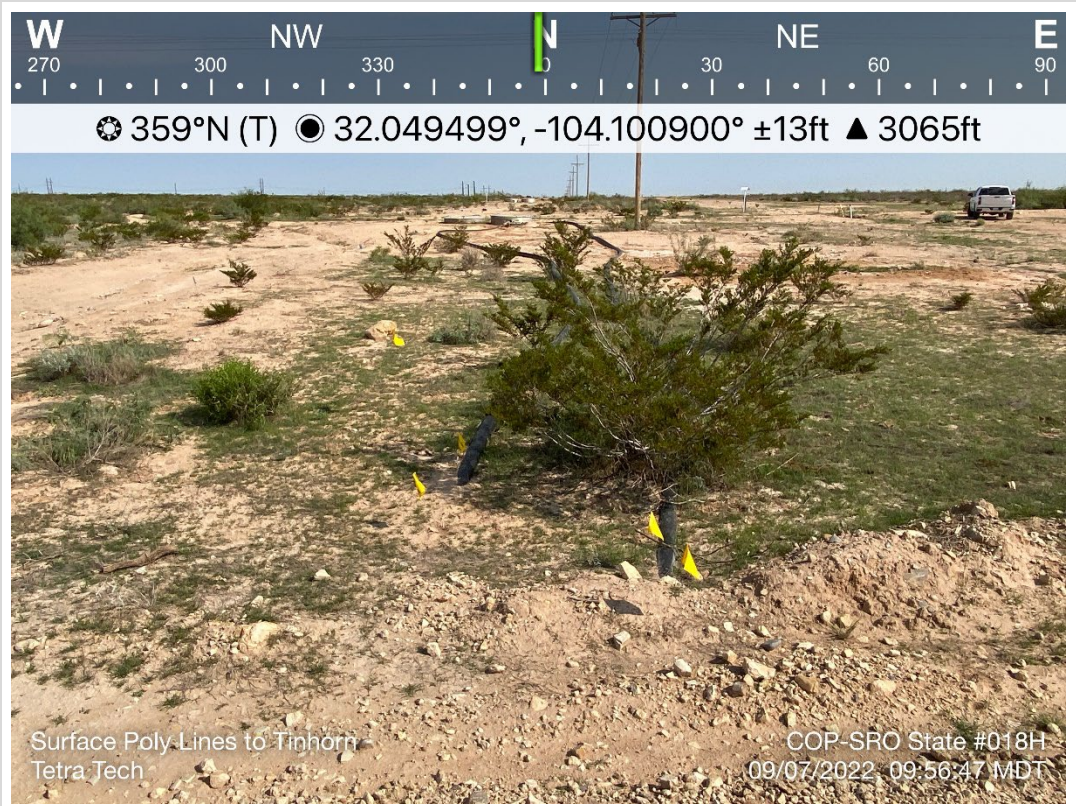
TETRA TECH, INC. PROJECT NO. 212C-MD-02826	DESCRIPTION	View of the Solaris valve cans.	2
	SITE NAME	SRO State Com #018H (nAB1730649817)	5/30/2023



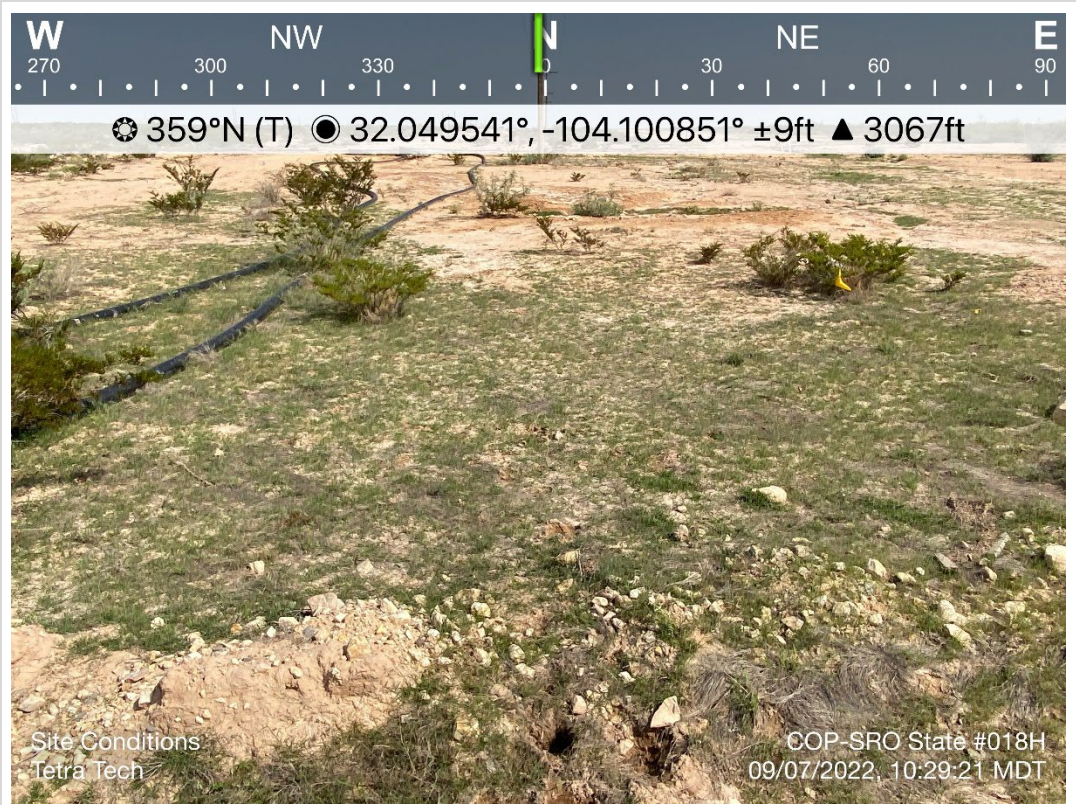
TETRA TECH, INC. PROJECT NO. 212C-MD-02826	DESCRIPTION	View inside the Solaris valve can.	3
	SITE NAME	SRO State Com #018H (nAB1730649817)	9/7/2022



TETRA TECH, INC. PROJECT NO. 212C-MD-02826	DESCRIPTION	View north from southern end of release extent. Subsurface line markings and vegetation.	4
	SITE NAME	SRO State Com #018H (nAB1730649817)	9/7/2022



TETRA TECH, INC. PROJECT NO. 212C-MD-02826	DESCRIPTION	View north from southern end of release extent. Subsurface line markings and vegetation.	5
	SITE NAME	SRO State Com #018H (nAB1730649817)	5/30/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-02826	DESCRIPTION	View north from southern end of release extent. Subsurface line markings and vegetation.	6
	SITE NAME	SRO State Com #018H (nAB1730649817)	5/30/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-02826	DESCRIPTION	View south. Surface polylines, subsurface line markings and vegetation.	7
	SITE NAME	SRO State Com #018H (nAB1730649817)	2/13/2018



TETRA TECH, INC. PROJECT NO. 212C-MD-02826	DESCRIPTION	View southwest. Surface polylines, subsurface line markings, and vegetation	8
	SITE NAME	SRO State Com #018H (nAB1730649817)	2/13/2018

APPENDIX E

Laboratory Analytical Data



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

October 31, 2023

NICHOLAS POOLE

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: SRO STATE COM #018H FLOWLINE RELEASE

Enclosed are the results of analyses for samples received by the laboratory on 10/24/23 12:49.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-22-15. 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
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	10/24/2023	Sampling Date:	10/24/2023
Reported:	10/31/2023	Sampling Type:	Soil
Project Name:	SRO STATE COM #018H FLOWLINE RELI	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02826	Sample Received By:	Tamara Oldaker
Project Location:	COP - EDDY CO NM		

Sample ID: AH - 10 (0-1') (H235816-01)

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	10/27/2023	ND	2.05	103	2.00	2.81		
Toluene*	<0.050	0.050	10/27/2023	ND	2.03	101	2.00	2.71		
Ethylbenzene*	<0.050	0.050	10/27/2023	ND	2.06	103	2.00	2.46		
Total Xylenes*	<0.150	0.150	10/27/2023	ND	5.90	98.4	6.00	2.15		
Total BTEX	<0.300	0.300	10/27/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 96.9 % 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	384	16.0	10/27/2023	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	10/27/2023	ND	182	90.9	200	1.64	
DRO >C10-C28*	<10.0	10.0	10/27/2023	ND	183	91.4	200	1.38	
EXT DRO >C28-C36	<10.0	10.0	10/27/2023	ND					

Surrogate: 1-Chlorooctane 67.8 % 48.2-134

Surrogate: 1-Chlorooctadecane 67.8 % 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
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	10/24/2023	Sampling Date:	10/24/2023
Reported:	10/31/2023	Sampling Type:	Soil
Project Name:	SRO STATE COM #018H FLOWLINE RELI	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02826	Sample Received By:	Tamara Oldaker
Project Location:	COP - EDDY CO NM		

Sample ID: AH - 10 (1'-2') (H235816-02)

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	10/27/2023	ND	2.05	103	2.00	2.81		
Toluene*	<0.050	0.050	10/27/2023	ND	2.03	101	2.00	2.71		
Ethylbenzene*	<0.050	0.050	10/27/2023	ND	2.06	103	2.00	2.46		
Total Xylenes*	<0.150	0.150	10/27/2023	ND	5.90	98.4	6.00	2.15		
Total BTEX	<0.300	0.300	10/27/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 96.4 % 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	560	16.0	10/27/2023	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	10/27/2023	ND	182	90.9	200	1.64	
DRO >C10-C28*	<10.0	10.0	10/27/2023	ND	183	91.4	200	1.38	
EXT DRO >C28-C36	<10.0	10.0	10/27/2023	ND					

Surrogate: 1-Chlorooctane 72.5 % 48.2-134

Surrogate: 1-Chlorooctadecane 72.5 % 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
 NICHOLAS POOLE
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	10/24/2023	Sampling Date:	10/24/2023
Reported:	10/31/2023	Sampling Type:	Soil
Project Name:	SRO STATE COM #018H FLOWLINE RELI	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02826	Sample Received By:	Tamara Oldaker
Project Location:	COP - EDDY CO NM		

Sample ID: AH - 11 (0-1') (H235816-03)

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	10/27/2023	ND	2.00	100	2.00	1.48		
Toluene*	<0.050	0.050	10/27/2023	ND	1.92	96.0	2.00	1.38		
Ethylbenzene*	<0.050	0.050	10/27/2023	ND	1.97	98.3	2.00	2.61		
Total Xylenes*	<0.150	0.150	10/27/2023	ND	5.79	96.5	6.00	4.82		
Total BTEX	<0.300	0.300	10/27/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 98.0 % 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	10/27/2023	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	10/27/2023	ND	182	90.9	200	1.64	
DRO >C10-C28*	<10.0	10.0	10/27/2023	ND	183	91.4	200	1.38	
EXT DRO >C28-C36	<10.0	10.0	10/27/2023	ND					

Surrogate: 1-Chlorooctane 71.0 % 48.2-134

Surrogate: 1-Chlorooctadecane 68.1 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received:	10/24/2023	Sampling Date:	10/24/2023
Reported:	10/31/2023	Sampling Type:	Soil
Project Name:	SRO STATE COM #018H FLOWLINE RELI	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02826	Sample Received By:	Tamara Oldaker
Project Location:	COP - EDDY CO NM		

Sample ID: AH - 12 (0-1') (H235816-04)

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	10/27/2023	ND	2.00	100	2.00	1.48		
Toluene*	<0.050	0.050	10/27/2023	ND	1.92	96.0	2.00	1.38		
Ethylbenzene*	<0.050	0.050	10/27/2023	ND	1.97	98.3	2.00	2.61		
Total Xylenes*	<0.150	0.150	10/27/2023	ND	5.79	96.5	6.00	4.82		
Total BTEX	<0.300	0.300	10/27/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 96.1 % 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	10/27/2023	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	10/27/2023	ND	182	90.9	200	1.64	
DRO >C10-C28*	<10.0	10.0	10/27/2023	ND	183	91.4	200	1.38	
EXT DRO >C28-C36	<10.0	10.0	10/27/2023	ND					

Surrogate: 1-Chlorooctane 59.0 % 48.2-134

Surrogate: 1-Chlorooctadecane 61.2 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received:	10/24/2023	Sampling Date:	10/24/2023
Reported:	10/31/2023	Sampling Type:	Soil
Project Name:	SRO STATE COM #018H FLOWLINE RELI	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02826	Sample Received By:	Tamara Oldaker
Project Location:	COP - EDDY CO NM		

Sample ID: AH - 4 (0-1') (H235816-05)

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	10/27/2023	ND	2.00	100	2.00	1.48		
Toluene*	<0.050	0.050	10/27/2023	ND	1.92	96.0	2.00	1.38		
Ethylbenzene*	<0.050	0.050	10/27/2023	ND	1.97	98.3	2.00	2.61		
Total Xylenes*	<0.150	0.150	10/27/2023	ND	5.79	96.5	6.00	4.82		
Total BTEX	<0.300	0.300	10/27/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 104 % 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	10/27/2023	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	10/27/2023	ND	182	90.9	200	1.64	
DRO >C10-C28*	<10.0	10.0	10/27/2023	ND	183	91.4	200	1.38	
EXT DRO >C28-C36	<10.0	10.0	10/27/2023	ND					

Surrogate: 1-Chlorooctane 68.2 % 48.2-134

Surrogate: 1-Chlorooctadecane 65.6 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received:	10/24/2023	Sampling Date:	10/24/2023
Reported:	10/31/2023	Sampling Type:	Soil
Project Name:	SRO STATE COM #018H FLOWLINE RELI	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02826	Sample Received By:	Tamara Oldaker
Project Location:	COP - EDDY CO NM		

Sample ID: AH - 5 (0-1') (H235816-06)

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	10/27/2023	ND	2.00	100	2.00	1.48		
Toluene*	<0.050	0.050	10/27/2023	ND	1.92	96.0	2.00	1.38		
Ethylbenzene*	<0.050	0.050	10/27/2023	ND	1.97	98.3	2.00	2.61		
Total Xylenes*	<0.150	0.150	10/27/2023	ND	5.79	96.5	6.00	4.82		
Total BTEX	<0.300	0.300	10/27/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 95.9 % 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	10/27/2023	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	10/27/2023	ND	182	90.9	200	1.64	
DRO >C10-C28*	<10.0	10.0	10/27/2023	ND	183	91.4	200	1.38	
EXT DRO >C28-C36	<10.0	10.0	10/27/2023	ND					

Surrogate: 1-Chlorooctane 67.4 % 48.2-134

Surrogate: 1-Chlorooctadecane 68.2 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received:	10/24/2023	Sampling Date:	10/24/2023
Reported:	10/31/2023	Sampling Type:	Soil
Project Name:	SRO STATE COM #018H FLOWLINE RELI	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02826	Sample Received By:	Tamara Oldaker
Project Location:	COP - EDDY CO NM		

Sample ID: AH - 6 (0-1') (H235816-07)

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	10/27/2023	ND	2.00	100	2.00	1.48		
Toluene*	<0.050	0.050	10/27/2023	ND	1.92	96.0	2.00	1.38		
Ethylbenzene*	<0.050	0.050	10/27/2023	ND	1.97	98.3	2.00	2.61		
Total Xylenes*	<0.150	0.150	10/27/2023	ND	5.79	96.5	6.00	4.82		
Total BTEX	<0.300	0.300	10/27/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 104 % 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	10/27/2023	ND	416	104	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	10/27/2023	ND	182	90.9	200	1.64	
DRO >C10-C28*	<10.0	10.0	10/27/2023	ND	183	91.4	200	1.38	
EXT DRO >C28-C36	<10.0	10.0	10/27/2023	ND					

Surrogate: 1-Chlorooctane 63.6 % 48.2-134

Surrogate: 1-Chlorooctadecane 63.4 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received:	10/24/2023	Sampling Date:	10/24/2023
Reported:	10/31/2023	Sampling Type:	Soil
Project Name:	SRO STATE COM #018H FLOWLINE RELI	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02826	Sample Received By:	Tamara Oldaker
Project Location:	COP - EDDY CO NM		

Sample ID: AH - 7 (0-1') (H235816-08)

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	10/27/2023	ND	2.00	100	2.00	1.48		
Toluene*	<0.050	0.050	10/27/2023	ND	1.92	96.0	2.00	1.38		
Ethylbenzene*	<0.050	0.050	10/27/2023	ND	1.97	98.3	2.00	2.61		
Total Xylenes*	<0.150	0.150	10/27/2023	ND	5.79	96.5	6.00	4.82		
Total BTEX	<0.300	0.300	10/27/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 101 % 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	10/27/2023	ND	416	104	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	10/27/2023	ND	182	90.9	200	1.64	
DRO >C10-C28*	<10.0	10.0	10/27/2023	ND	183	91.4	200	1.38	
EXT DRO >C28-C36	<10.0	10.0	10/27/2023	ND					

Surrogate: 1-Chlorooctane 64.3 % 48.2-134

Surrogate: 1-Chlorooctadecane 60.5 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received:	10/24/2023	Sampling Date:	10/24/2023
Reported:	10/31/2023	Sampling Type:	Soil
Project Name:	SRO STATE COM #018H FLOWLINE RELI	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02826	Sample Received By:	Tamara Oldaker
Project Location:	COP - EDDY CO NM		

Sample ID: AH - 8 (0-1') (H235816-09)

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	10/27/2023	ND	2.00	100	2.00	1.48		
Toluene*	<0.050	0.050	10/27/2023	ND	1.92	96.0	2.00	1.38		
Ethylbenzene*	<0.050	0.050	10/27/2023	ND	1.97	98.3	2.00	2.61		
Total Xylenes*	<0.150	0.150	10/27/2023	ND	5.79	96.5	6.00	4.82		
Total BTEX	<0.300	0.300	10/27/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 103 % 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	10/27/2023	ND	416	104	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	10/27/2023	ND	188	94.0	200	3.61	
DRO >C10-C28*	<10.0	10.0	10/27/2023	ND	179	89.7	200	2.29	
EXT DRO >C28-C36	<10.0	10.0	10/27/2023	ND					

Surrogate: 1-Chlorooctane 76.9 % 48.2-134

Surrogate: 1-Chlorooctadecane 68.9 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received:	10/24/2023	Sampling Date:	10/24/2023
Reported:	10/31/2023	Sampling Type:	Soil
Project Name:	SRO STATE COM #018H FLOWLINE RELI	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02826	Sample Received By:	Tamara Oldaker
Project Location:	COP - EDDY CO NM		

Sample ID: AH - 9 (0-1') (H235816-10)

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	10/27/2023	ND	2.00	100	2.00	1.48		
Toluene*	<0.050	0.050	10/27/2023	ND	1.92	96.0	2.00	1.38		
Ethylbenzene*	<0.050	0.050	10/27/2023	ND	1.97	98.3	2.00	2.61		
Total Xylenes*	<0.150	0.150	10/27/2023	ND	5.79	96.5	6.00	4.82		
Total BTEX	<0.300	0.300	10/27/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 94.8 % 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	10/27/2023	ND	416	104	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	10/27/2023	ND	188	94.0	200	3.61	
DRO >C10-C28*	<10.0	10.0	10/27/2023	ND	179	89.7	200	2.29	
EXT DRO >C28-C36	<10.0	10.0	10/27/2023	ND					

Surrogate: 1-Chlorooctane 82.0 % 48.2-134

Surrogate: 1-Chlorooctadecane 75.2 % 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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Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

Company Name: Tetra Tech

Project Manager: Nicholas Poole

Address: 8911 Capital o Texas Hwy, Suite 2310

City: Austin State: TX Zip:

Phone #: (512)565-0190 Fax #: Project Owner: ComocoPhillips

Project #: 212C-MD-02826 Project Name: SRO State Com #018H Flowline Release

Project Location: Eddy County, New Mexico

Sampler Name: Colton Bickerstaff

Lab I.D.

BILL TO

ANALYSIS REQUEST

P.O. #: Company: Tetra Tech

Attn: Nicholas Poole

Address: EMAIL

City: State: Zip:

Phone #: Fax #:

FOR LAB USE ONLY
Sample I.D.
Lab I.D.

Sample I.D.	Date	Time	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX					PRESERV.	SAMPLING	TPH 8015M	BTEX 8021B	Chloride SM4500Cl-B						
					GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER : ACID/BASE:	ICE / COOL OTHER :									
H23-5814	AH-10 (0-1')		G	1	X							X	X	X						
	AH-10 (1'-2')		G	1	X							X	X	X						
	AH-11 (0-1')		G	1	X							X	X	X						
	AH-12 (0-1')		G	1	X							X	X	X						
	AH-4 (0-1')		G	1	X							X	X	X						
	AH-5 (0-1')		G	1	X							X	X	X						
	AH-6 (0-1')		G	1	X							X	X	X						
	AH-7 (0-1')		G	1	X							X	X	X						
	AH-8 (0-1')		G	1	X							X	X	X						
	AH-9 (0-1')		G	1	X							X	X	X						

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Relinquished By: Colton Bickerstaff	Date: 10/24/23	Received By: [Signature]	Verbal Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
Relinquished By:	Date: 12/19	Received By: [Signature]	All Results are emailed. Please provide Email address: Nicholas.Poole@tetratech.com	
REMARKS:				

Delivered By: (Circle one) Sampler - UPS - Bus - Other	Observed Temp. °C Corrected Temp. °C	Sample Condition Cool Intact <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Other <input type="checkbox"/> Yes <input type="checkbox"/> No	CHECKED BY: (Initials) [Signature]	Turnaround Time: Standard <input checked="" type="checkbox"/> Rush: NO, N/A <input type="checkbox"/>	Backlog (only Sample Condition) Observed Temp. °C	Thermometer ID #113 Correction Factor -0.5°C	Yes <input type="checkbox"/> No <input type="checkbox"/>	Corrected Temp. °C
---	---	---	---------------------------------------	--	--	---	--	--------------------

FORM-006 R 3.2 10/07/21

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



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

December 21, 2023

CHRISTIAN LLULL

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: SRO STATE COM #018H

Enclosed are the results of analyses for samples received by the laboratory on 12/18/23 17:01.

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:	12/18/2023	Sampling Date:	12/18/2023
Reported:	12/21/2023	Sampling Type:	Soil
Project Name:	SRO STATE COM #018H	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02826	Sample Received By:	Tamara Oldaker
Project Location:	EDDY CO NM		

Sample ID: T - 1 (2' - 3') (H236723-01)

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	12/19/2023	ND	2.14	107	2.00	12.7	
Toluene*	<0.050	0.050	12/19/2023	ND	2.24	112	2.00	12.4	
Ethylbenzene*	<0.050	0.050	12/19/2023	ND	2.26	113	2.00	12.3	
Total Xylenes*	<0.150	0.150	12/19/2023	ND	6.80	113	6.00	12.5	
Total BTEX	<0.300	0.300	12/19/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 118 % 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	112	16.0	12/19/2023	ND	432	108	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	12/19/2023	ND	172	85.9	200	1.03	
DRO >C10-C28*	<10.0	10.0	12/19/2023	ND	177	88.6	200	1.76	
EXT DRO >C28-C36	<10.0	10.0	12/19/2023	ND					

Surrogate: 1-Chlorooctane 72.2 % 48.2-134

Surrogate: 1-Chlorooctadecane 67.0 % 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:	12/18/2023	Sampling Date:	12/18/2023
Reported:	12/21/2023	Sampling Type:	Soil
Project Name:	SRO STATE COM #018H	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02826	Sample Received By:	Tamara Oldaker
Project Location:	EDDY CO NM		

Sample ID: T - 2 (1.5' - 2') (H236723-02)

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	12/20/2023	ND	2.57	128	2.00	9.69		
Toluene*	<0.050	0.050	12/20/2023	ND	2.50	125	2.00	13.6		
Ethylbenzene*	<0.050	0.050	12/20/2023	ND	2.60	130	2.00	13.4		
Total Xylenes*	<0.150	0.150	12/20/2023	ND	7.74	129	6.00	13.4		
Total BTEX	<0.300	0.300	12/20/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 100 % 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	80.0	16.0	12/19/2023	ND	432	108	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	12/19/2023	ND	172	85.9	200	1.03	
DRO >C10-C28*	<10.0	10.0	12/19/2023	ND	177	88.6	200	1.76	
EXT DRO >C28-C36	<10.0	10.0	12/19/2023	ND					

Surrogate: 1-Chlorooctane 67.7 % 48.2-134

Surrogate: 1-Chlorooctadecane 62.7 % 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:	12/18/2023	Sampling Date:	12/18/2023
Reported:	12/21/2023	Sampling Type:	Soil
Project Name:	SRO STATE COM #018H	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 02826	Sample Received By:	Tamara Oldaker
Project Location:	EDDY CO NM		

Sample ID: T - 2 (2' - 3') (H236723-03)

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	12/20/2023	ND	2.57	128	2.00	9.69		
Toluene*	<0.050	0.050	12/20/2023	ND	2.50	125	2.00	13.6		
Ethylbenzene*	<0.050	0.050	12/20/2023	ND	2.60	130	2.00	13.4		
Total Xylenes*	<0.150	0.150	12/20/2023	ND	7.74	129	6.00	13.4		
Total BTX	<0.300	0.300	12/20/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 104 % 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	80.0	16.0	12/19/2023	ND	432	108	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	12/20/2023	ND	172	85.9	200	1.03	
DRO >C10-C28*	<10.0	10.0	12/20/2023	ND	177	88.6	200	1.76	
EXT DRO >C28-C36	<10.0	10.0	12/20/2023	ND					

Surrogate: 1-Chlorooctane 57.9 % 48.2-134

Surrogate: 1-Chlorooctadecane 52.8 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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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.
BS-3	Blank spike recovery outside of lab established statistical limits, but still within method limits. Data is not adversely affected.
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 "C. D. Keene".

Celey D. Keene, Lab Director/Quality Manager



101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]

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 311580

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:	229137
	Action Number:	311580
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAB1730649817
Incident Name	NAB1730649817 SRO STATE COM #018H @ 30-015-39999
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Well	[30-015-39999] SRO STATE COM #018H

Location of Release Source	
Please answer all the questions in this group.	
Site Name	SRO STATE COM #018H
Date Release Discovered	10/27/2017
Surface Owner	State

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

Nature and Volume of Release	
Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.	
Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Equipment Failure Flow Line - Production Produced Water Released: 20 BBL Recovered: 0 BBL Lost: 20 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.

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

QUESTIONS, Page 2

Action 311580

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 311580
	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: 02/05/2024
--	--

District I

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

QUESTIONS, Page 3

Action 311580

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:
	229137
	Action Number:
	311580
Action Type:	
[C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

QUESTIONS**Site Characterization**

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

What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 51 and 75 (ft.)
What method was used to determine the depth to ground water	Attached Document
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 1 and 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1000 (ft.) and ½ (mi.)
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	Greater than 5 (mi.)
Any other fresh water well or spring	Greater than 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 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	Greater than 5 (mi.)
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)	4080
TPH (GRO+DRO+MRO)	(EPA SW-846 Method 8015M)	62.8
GRO+DRO	(EPA SW-846 Method 8015M)	62.8
BTEX	(EPA SW-846 Method 8021B or 8260B)	0
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	10/24/2023
On what date will (or did) the final sampling or liner inspection occur	12/18/2023
On what date will (or was) the remediation complete(d)	12/18/2023
What is the estimated surface area (in square feet) that will be reclaimed	1900
What is the estimated volume (in cubic yards) that will be reclaimed	0
What is the estimated surface area (in square feet) that will be remediated	0
What is the estimated volume (in cubic yards) that will be remediated	0

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

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

District I

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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 4

Action 311580

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 311580
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS**Remediation Plan (continued)**

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

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

(Select all answers below that apply.)	
(Ex Situ) Excavation and off-site disposal (i.e. dig and haul, hydrovac, etc.)	Not answered.
(Ex Situ) Excavation and on-site remediation (i.e. On-Site Land Farms)	Not answered.
(In Situ) Soil Vapor Extraction	Not answered.
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	Not answered.
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	Not answered.
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	Not answered.
Ground Water Abatement pursuant to 19.15.30 NMAC	Not answered.
OTHER (Non-listed remedial process)	Yes
Other Non-listed Remedial Process. Please specify	All analytical results are below reclamation requirements. No need for remedy.

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

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

I hereby agree and sign off to the above statement	Name: Christian LLuLL Title: Project Manager Email: christian.llull@tetrattech.com Date: 02/05/2024
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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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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
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QUESTIONS, Page 5

Action 311580

QUESTIONS (continued)

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

QUESTIONS

Deferral Requests Only	
<i>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.</i>	
Requesting a deferral of the remediation closure due date with the approval of this submission	No

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QUESTIONS, Page 6

Action 311580

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:	229137
	Action Number:	311580
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	295619
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	12/18/2023
What was the (estimated) number of samples that were to be gathered	3
What was the sampling surface area in square feet	1925

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	1900
What was the total volume (cubic yards) remediated	140
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	1900
What was the total volume (in cubic yards) reclaimed	140
Summarize any additional remediation activities not included by answers (above)	No remedy is required as all concentrations in remaining soil are below reclamation requirements and meet the most stringent requirements of Table 1.

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: 02/05/2024
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QUESTIONS, Page 7

Action 311580

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 311580
	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 311580

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 311580
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
bhall	Remediation Closure approved. A complete and accurate reclamation report will need to be submitted. The reclamation report will need to address all of the requirements of 19.15.29.13 NMAC including but not limited to pictures of the reclaimed area, and a proposed revegetation plan. Subsequent to the approval of a reclamation plan, a revegetation report will need to be submitted, including pictures of the revegetated areas, once the site meets the requirements for vegetation cover found in 19.15.29.13 D.(3) NMAC. Per 19.15.29.13 E. NMAC, if a reclamation and revegetation report has been submitted to the surface owner, it may be used as long as the requirements of the surface owner provide equal or better protection of freshwater, human health and the environment.	2/6/2024