



January 23, 2025

New Mexico Oil Conservation Division

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

**Re: Closure Request
Bonaid Federal 17D
Incident Number nAPP2435143129
Lea County, New Mexico**

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of COG Operating, LLC, (COG), has prepared this *Closure Request* to document the findings of a liner integrity inspection conducted at the Bonaid Federal 17D (Site) following a release of produced water within a lined containment. Based on the liner integrity inspection activities, COG is submitting this *Closure Request*, describing assessment activities that have occurred and requesting no further action and closure for Incident Number nAPP2435143129.

SITE DESCRIPTION AND RELEASE SUMMARY

The Site is located in Unit D, Section 17, Township 24 South, Range 35 East, in Lea County, New Mexico (32.2228111°, -103.39411944°) and is associated with oil and gas exploration and production operations on private land owned by Quail Ranch.

On December 16, 2024, a 1-inch plastic coated carbon/steel nipple above a transfer pump broke at the threads, causing a release of approximately 61 barrels (bbls) of produced water into a lined containment. A vacuum truck was dispatched to the Site to recover free-standing fluids; approximately 61 bbls of produced water were recovered. The lined containment was power washed to remove any residual fluids. COG reported the release to the New Mexico Oil Conservation Division (NMOCD) via a *Notification of Release* (NOR) on December 16, 2024, and subsequently on a *Release Notification Form C-141* (Form C-141) on January 7, 2025. The release was assigned Incident Number nAPP2435143129.

SITE CHARACTERIZATION AND CLOSURE CRITERIA

The Site was characterized for applicability of Table I, Closure Criteria for Soils Impacted by a Release, of Title 19, Chapter 15, Part 29 (19.15.29) of the New Mexico Administrative Code (NMAC). Results from the characterization are summarized below and detailed in the NMOCD permitting portal Form C-141 Site Characterization section.

Depth to groundwater at the Site is estimated to be greater than 100 feet below ground surface (bgs) based on the nearest groundwater well data. The closest permitted groundwater well with depth to groundwater data less than 25 years old is New Mexico Office of the State Engineer (NMOSE) permitted well CP-01513, located approximately 1.9 miles northeast of the Site. The groundwater well has a reported total depth of 186 feet bgs, and no groundwater was encountered. All wells used for depth to

COG Operating, LLC
Closure Request
Bonaire Federal 17D

groundwater determination are presented on Figure 1 and the associated well records are included in Appendix A.

The closest continuously flowing or significant watercourse to the Site is a streambed, located approximately 0.64 miles southwest of the Site. The Site is greater than 200 feet from a lakebed, sinkhole, or playa lake and greater than 300 feet from an occupied residence, school, hospital, institution, church, or wetland. The Site is greater than 1,000 feet to a freshwater well or spring and is not within a 100-year floodplain or overlying a subsurface mine. The Site is not underlain by unstable geology (low potential karst designation area). Potential Site receptors are identified in Figure 1.

Based on the results of the Site Characterization, the following NMOCD Table I Closure Criteria (Closure Criteria) apply:

- Benzene: 10 milligrams per kilogram (mg/kg)
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX): 50 mg/kg
- Total petroleum hydrocarbons (TPH): 100 mg/kg
- Chloride: 600 mg/kg

LINER INTEGRITY INSPECTION ACTIVITIES

A 48-hour advance notice of the liner inspection was submitted to the NMOCD on January 10, 2025. Prior to conducting the liner integrity inspection, COG operations power washed the liner to remove dirt and debris and recover any residual produced water. A liner integrity inspection was conducted by Ensolum personnel on January 17, 2025. Upon inspection, no rips, tears, holes, or damage was observed. The liner was determined to be sufficient to contain fluids, and all released fluids have been removed. Photographic documentation of the inspection is included in Appendix B.

CLOSURE REQUEST

Liner integrity inspection activities were conducted following a release of produced water within a lined containment at the Site. A liner integrity inspection was conducted by Ensolum personnel on January 17, 2025. Upon inspection, no rips, tears, holes, or damage were observed, and the liner was determined to be sufficient to contain fluids. The release was contained laterally by the lined containment and the liner was performing as designed. Based on initial response efforts and the liner operating as designed, COG respectfully requests closure for Incident Number nAPP2435143129.

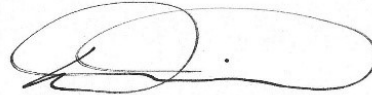
COG Operating, LLC
Closure Request
Bonaire Federal 17D

If you have any questions or comments, please contact Mr. Daniel R. Moir at (303) 887-2946 or dmoir@ensolum.com.

Sincerely,
Ensolum, LLC



Noah Duker
Associate Environmental Scientist



Daniel R. Moir, PG (licensed in WY & TX)
Senior Managing Geologist

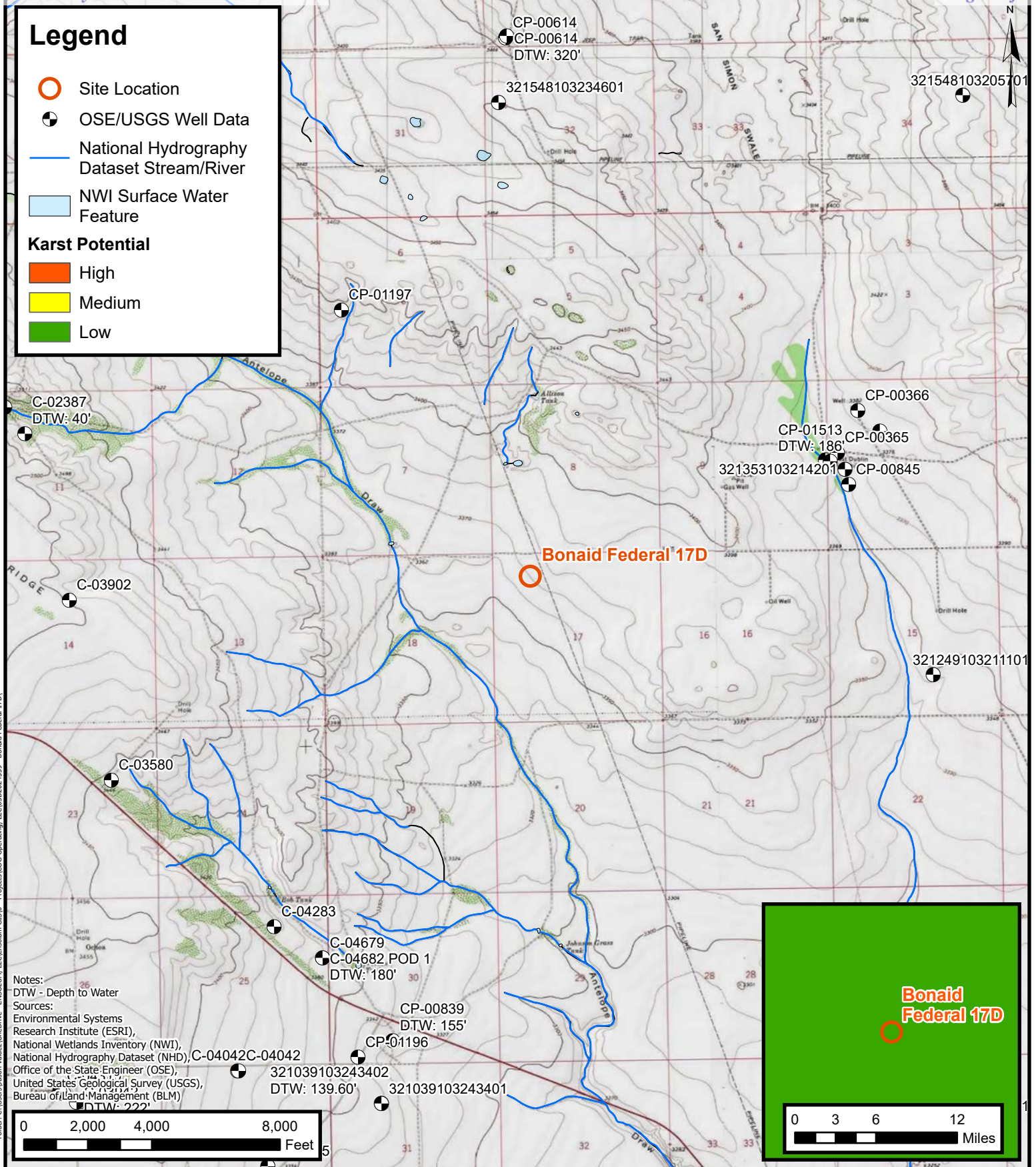
Cc: Jacob Laird, ConocoPhillips Company
Quail Ranch

Appendices:

Figure 1	Site Receptor Map
Figure 2	Release Map
Appendix A	Referenced Well Records
Appendix B	Photographic Log



FIGURES



Legend

- ✗ Point of Release (POR)
 — Metal Berm



Notes:
 Sample ID @ Depth Below Ground Surface.

0 15 30 60 90 120
 Feet

Sources: Environmental Systems Research Institute (ESRI)

**Release Map**

COG Operating, LLC
 Bonaid Federal 17D
 Incident Number: nAPP2435143129
 Unit D, Section 17, T 24S, R 35E
 Lea County, New Mexico

FIGURE**2**



APPENDIX A

Referenced Well Records

Well Tag	POD Nbr	Q64	Q16	Q4	Sec	Tws	Rng	X	Y	Map
221BF	CP 00614 POD2	SE	SW	SW	29	23S	35E	651102.0	3571401.1	

* UTM location was derived from PLSS - see Help

Driller License: 1706 **Driller Company:** SUPERIOR DRILLING, LLC

Driller Name: WALLACE, BRYCE J.LEE.NER

Drill Start Date: 2018-11-20 **Drill Finish Date:** 2018-11-23 **Plug Date:**

Log File Date: 2019-03-01 **PCW Rcv Date:** **Source:** Shallow


Pump Type: **Pipe Discharge Size:** **Estimated Yield:** 35

Casing Size: 7.60 **Depth Well:** 440 **Depth Water:** 320

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

quarters are smallest to largest

NAD83 UTM in meters

Well Tag	POD Nbr	Q64	Q16	Q4	Sec	Tws	Rng	X	Y	Map
	CP 01513 POD1	SW	SW	NW	10	24S	35E	654184.0	3567350.8	

* UTM location was derived from PLSS - see Help

Driller License:	1607	Driller Company:	DURAN DRILLING
Driller Name:	DURNA, LUIS A. (TONY)		
Drill Start Date:	2015-06-29	Drill Finish Date:	2015-06-30
Log File Date:	2015-07-13	PCW Rcv Date:	Source: Shallow
Pump Type:	Pipe Discharge Size:	Estimated Yield:	1
Casing Size:	6.00	Depth Well:	186
		Depth Water:	

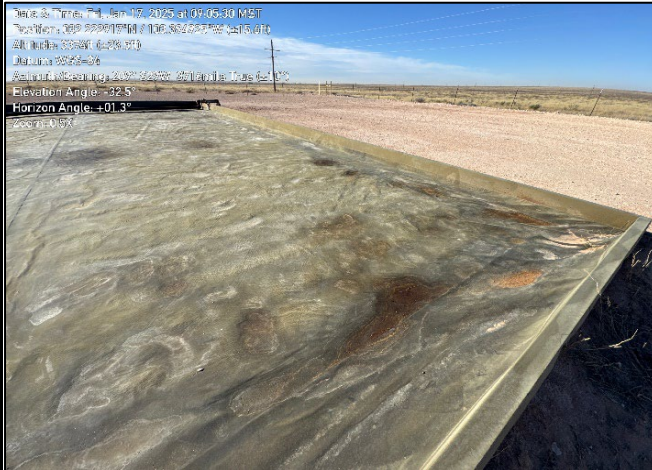


APPENDIX B

Photographic Log



Photographic Log
 COG Operating, LLC
 Bonaid Federal 17D
 nAPP2435143129



Photograph: 1 Date: 1/17/2025
 Description: Liner during liner inspection
 View: Southwest



Photograph: 2 Date: 1/17/2025
 Description: Liner during liner inspection
 View: North



Photograph: 3 Date: 1/17/2025
 Description: Liner and equipment during inspection
 View: Southwest



Photograph: 4 Date: 1/17/2025
 Description: Liner during inspection
 View: Northeast



Photographic Log
 COG Operating, LLC
 Bonaid Federal 17D
 nAPP2435143129



Photograph: 5 Date: 1/17/2025
 Description: Liner during liner inspection
 View: Southwest



Photograph: 6 Date: 1/17/2025
 Description: Liner and equipment during inspection
 View: South



Photograph: 7 Date: 1/17/2025
 Description: Liner and equipment during inspection
 View: North



Photograph: 8 Date: 1/17/2025
 Description: Liner and equipment during inspection
 View: South



Photographic Log
 COG Operating, LLC
 Bonaid Federal 17D
 nAPP2435143129



Photograph: 9 Date: 1/17/2025
 Description: Liner and equipment during inspection
 View: Southwest



Photograph: 10 Date: 1/17/2025
 Description: Liner and equipment during inspection
 View: Northeast



Photograph: 11 Date: 1/17/2025
 Description: Liner and equipment during inspection
 View: Southwest



Photograph: 12 Date: 1/17/2025
 Description: Liner and equipment during inspection
 View: Northeast



Photographic Log
 COG Operating, LLC
 Bonaid Federal 17D
 nAPP2435143129



Photograph: 13 Date: 1/17/2025
 Description: Liner and equipment during inspection
 View: Southwest



Photograph: 14 Date: 1/17/2025
 Description: Liner and equipment during inspection
 View: Southwest



Photograph: 15 Date: 1/17/2025
 Description: Liner and equipment during inspection
 View: Northeast



Photograph: 16 Date: 1/17/2025
 Description: Liner and equipment during inspection
 View: Southwest

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

General Information
Phone: (505) 629-6116

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

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

QUESTIONS

Action 436531

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 436531
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2435143129
Incident Name	NAPP2435143129 BONAID FEDERAL 17D CTB @ 0
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Facility	[fAPP2203234936] Bonaoid Federal 17D CTB

Location of Release Source <i>Please answer all the questions in this group.</i>	
Site Name	Bonaoid Federal 17D CTB
Date Release Discovered	12/16/2024
Surface Owner	Private

Incident Details <i>Please answer all the questions in this group.</i>	
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 <i>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.</i>	
Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Other Pump Produced Water Released: 61 BBL Recovered: 60 BBL Lost: 1 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.

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

General Information
Phone: (505) 629-6116

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

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

QUESTIONS, Page 2

Action 436531

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 436531
	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	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
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	A vacuum truck is in route to the location to recover all freestanding fluids. The total recovered volume will be reflected on the submission of the C-141.

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

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

I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 02/27/2025
--	---

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

General Information
Phone: (505) 629-6116

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

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

QUESTIONS, Page 3

Action 436531

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 436531
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Site Characterization	
<i>Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 100 and 500 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Between ½ and 1 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Greater than 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1 and 5 (mi.)
Any other fresh water well or spring	Between 1 and 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between ½ and 1 (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	Low
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	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
On what estimated date will the remediation commence	12/16/2025
On what date will (or did) the final sampling or liner inspection occur	01/17/2025
On what date will (or was) the remediation complete(d)	01/17/2025
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
<i>These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.</i>	
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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

General Information
Phone: (505) 629-6116

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

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

QUESTIONS, Page 4

Action 436531

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 436531
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Remediation Plan (continued)	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:	
<i>(Select all answers below that apply.)</i>	
Is (or was) there affected material present needing to be removed	Yes
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	No
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 02/27/2025
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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

General Information
Phone: (505) 629-6116

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

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

QUESTIONS, Page 6

Action 436531

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 436531
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	419562
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	01/17/2025
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	14705

Remediation Closure Request	
<i>Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.</i>	
Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
What was the total surface area (in square feet) remediated	0
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	"Upon inspection, no rips, tears, holes, or damage were observed, and the liner was determined to be sufficient to contain fluids. The release was contained laterally by the lined containment and the liner was performing as designed."
<i>The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (in .pdf format) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.</i>	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.	
I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 02/27/2025

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

General Information
Phone: (505) 629-6116

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

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

CONDITIONS

Action 436531

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 436531
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
scott.rodgers	App ID 436531 Liner Inspection approved	3/10/2025