Spill Calculation - On-Pad Surface Spill

| Convert Irregular shape into a series of rectangles | Length (ft.) | Width (ft.) | Average Depth (in.) | Estimated *Pool* Area (sq. ft.) | Estimated volume of each pool area (bbl.) | Penetration allowance (ft.) | Total Estimated Volume of Spill (bbl.) |
|---|---|---|---|---|---|---|---|
| Rectangle A | 30 | 150 | 0.5 | 4500.00 | 33.38 | 0.00 | 33.44 |
| Rectangle B | 32 | 20 | 0.5 | 640.00 | 4.75 | 0.00 | 4.76 |
| Rectangle C | | | | 0.00 | 0.00 | 0.00 | 0.00 |
| Rectangle D | | | | 0.00 | 0.00 | 0.00 | 0.00 |
| Rectangle E | | | | 0.00 | 0.00 | 0.00 | 0.00 |
| Rectangle F | | | | 0.00 | 0.00 | 0.00 | 0.00 |
| Rectangle G | | | | 0.00 | 0.00 | 0.00 | 0.00 |
| Rectangle H | | | | 0.00 | 0.00 | 0.00 | 0.00 |
| Rectangle I | | | | 0.00 | 0.00 | 0.00 | 0.00 |
| Rectangle J | | | | | 0.00 | 0.00 | 0.00 |
| Total Surface Pool Volume Released, Release to Soil/Caliche | | | | | | | 38.2011 |

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

**Our Ref:** 12667260-ConocoPhillips-1

**June 09, 2025**

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

**Closure Report**
**Conoco Phillips Company**
**Mercury St Com CTB**
**Unit Letter N, Section 18, T26S, R28E**
**GPS: 32.036945, -104.127669**
**Eddy County, New Mexico**

# 1. Introduction

GHD Services, Inc. (GHD), on behalf of Conoco Phillips Company (Conoco) has prepared this *Closure Report* to document site assessment activities at Mercury St Com CTB (Site). The purpose of the assessment was to determine the presence or absence of impacts to soil following a release of produced water within a lined containment at the Site. Based on field observations, Conoco is submitting this *Closure Report*, describing site assessment activities that have occurred and requesting closure for Incident Number nAPP2507434560.

# 2. Site Description and Release Summary

The Site is in Unit N, Section 18, Township 26 South, Range 28 East, in Eddy County, New Mexico (32.036945 N, -104.127669 W) and is associated with oil and gas exploration and production operations on State Land managed by the New Mexico State Land Office (NMSLO). On March 15, 2025, a spill of produced water was released into the lined secondary containment. A vacuum truck was dispatched to the Site to recover free-standing fluids; all released produced water was recovered from within the lined containment. The release was reported to the New Mexico Oil Conservation Division (NMOCD) on March 15, 2025, and was subsequently assigned Incident Number nAPP2507434560.

# 3. Site Characterization and Closure Criteria

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

According to the soil survey provided by the United States Department of Agriculture National Resources Conservation Services, the soils located within the Site consists of primarily of Ector stony loam, with 0-9 percent slopes, and Reeves-Gypsum land complex, with 0-3 percent slopes. Per the New Mexico Bureau of Geology and Mineral Resources, the shallow geology is Salado Formation, Upper Permian in age. The Site is located within an area of high karst potential.

Groundwater was determined utilizing the New Mexico Office of the State Engineers (NMOSE) database for registered water wells, no known water sources is located with 0.50-mile radius of the Site. The nearest permitted groundwater well with depth to groundwater data is well USGS 320230104060601 located approximately 1.55 miles northeast of the Site. The well has a reported depth to groundwater of 16.35' below ground surface (ft bgs) on January 22, 1998. A copy of the referenced well record is included in **Attachment A**.

This Site is not within 300 feet of any continuous flowing watercourse or 100-year floodplains but is approximately 0.42 miles north of Owl Draw. The Site is greater than 5 miles from an occupied residence, school, hospital, institution, or church and the nearest fresh water well for livestock watering purposes is located approximately 0.61 miles west of the Site. The nearest wetland is approximately 0.42 miles west from the Site and the nearest subsurface mine in greater than 5 miles away. The location of the Site is depicted on **Figure 1**. A detailed map of the Site is provided on **Figure 2**. The Site Characterization Documentation is included in **Attachment B**.

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

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

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

# 4. Site Assessment Activities

The liner inspection notice was provided on March 31, 2025. A liner integrity inspection was performed on April 2, 2025, after the secondary containment was cleaned for a visual inspection. The liner was visually inspected and no rips, tears, holes, or damages in the liner were observed. The liner was determined to be intact with no integrity issues. Photographic documentation of the liner inspection is presented in **Attachment C**.

# 5. Closure Request

Based on the liner inspection and assessment activities at the Site, Conoco respectfully requests that no further actions be required, and requests closure of Incident Number nAPP2436627996 be granted.

Regards,

**Kayla Taylor**
Senior Project Manager

432-210-5443
Kayla.Taylor@ghd.com

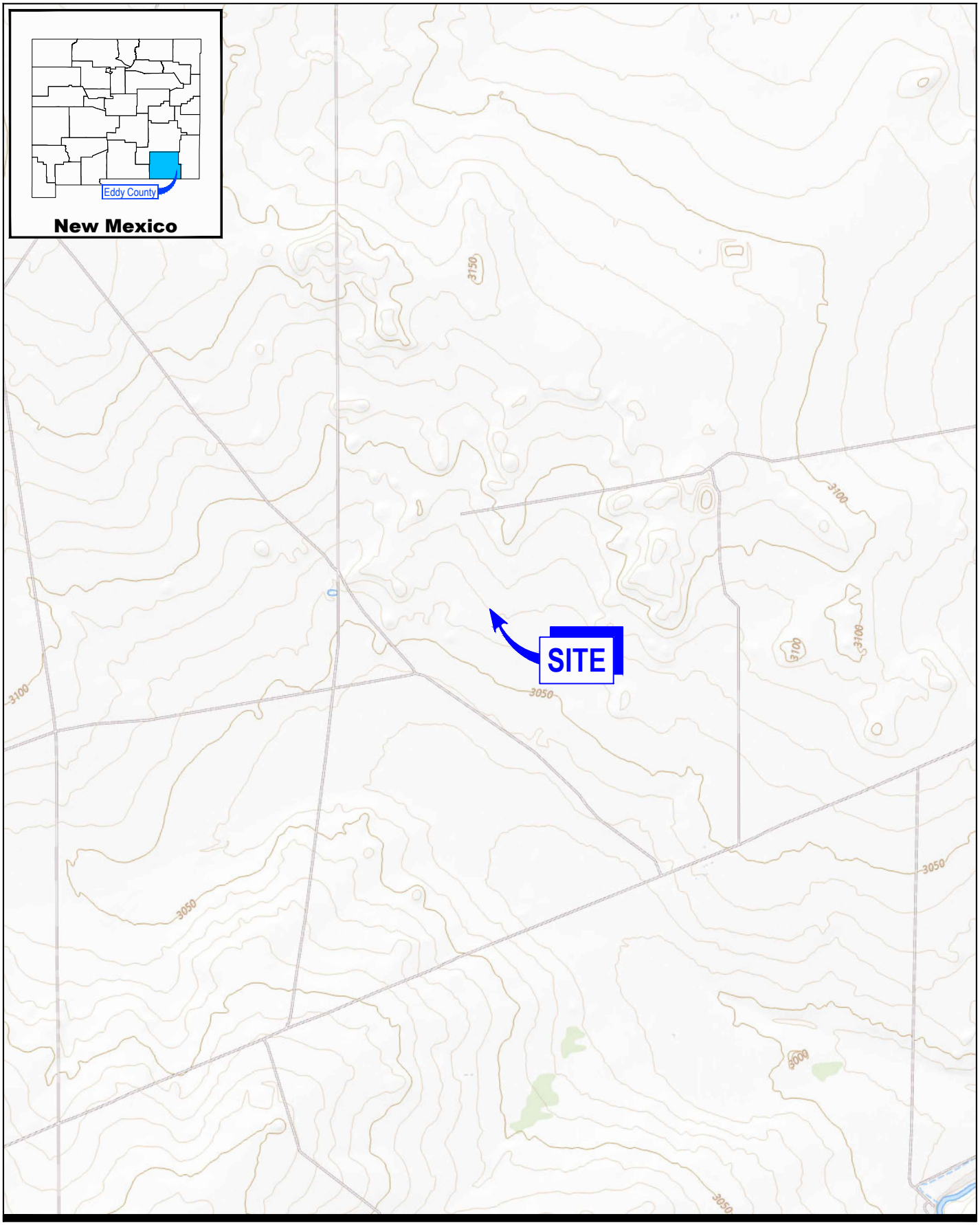
**Jessica Wright**
Project Director

713- 337-5419
Jessica.Wright@ghd.com

KT/ls/1

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

# Figures




0 1000 2000 ft

1" = 2000 ft

Coordinate System:
NAD 1983 State Plane-
New Mexico East (US Feet)

N

GHD

**CONOCOPHILLIPS COMPANY**
**EDDY COUNTY, NEW MEXICO**
**MERCURY STATE COM CTB**
**INCIDENT No. nAPP2507434560**

Project No. **12667260**
Date **May 2025**

**SITE LOCATION MAP**

**FIGURE 1**

Filename: \\ghdnet\ghd\US\Midland\Projects\562\12667260\Digital_Design\ACAD\Figures\12667260-GHD-00-00-RPT-EN-D101_DL-001.dwg

Data Source: USGS 7.5 Minute Quad "Cottonwood Hills and Red Bluff, New Mexico"
Lat/Long: 32.036945° North, 104.127669° West


0 30 60 ft

1" = 60 ft
Coordinate System:
NAD 1983 State Plane-
New Mexico East (US Feet)

N

GHD

**CONOCOPHILLIPS COMPANY**
**EDDY COUNTY, NEW MEXICO**
**MERCURY STATE COM CTB**
**INCIDENT No. nAPP2507434560**

**SITE DETAILS MAP**

Project No. **12667260**
Date **May 2025**

# FIGURE 2

Filename: \\ghdnet\ghd\US\Midland\Projects\562\12667260\Digital_Design\ACAD\Figures\12667260-GHD-00-00-RPT-EN-D101_DL-001.dwg
Plot Date: 28 May 2025 2:31 PM

Data Source: Image © 2025 Google - Imagery Date: July 13, 2024
Lat/Long: 32.036945° North, 104.127669° West

# Attachments

# Attachment A

## Well Reports

Click to hideNews Bulletins

- Explore the *NEW* USGS National Water Dashboard interactive map to access real-time water data from over 13,500 stations nationwide.

Groundwater levels for New Mexico

Click to hide state-specific text

Important: Next Generation Monitoring Location Page

## Search Results -- 1 sites found

**Agency code =** usgs
**site_no list =**
- 320230104060601

**Minimum number of levels =** 1
Save file of selected sites to local disk for future upload

## USGS 320230104060601 26S.28E.18.33111

Eddy County, New Mexico
Latitude 32°02'30", Longitude 104°06'06" NAD27
Land-surface elevation 3,070 feet above NAVD88
This well is completed in the Other aquifers (N9999OTHER) national aquifer.
This well is completed in the Castile Formation (312CSTL) local aquifer.

**Output formats**

| |
|---|
| Table of data |
| Tab-separated data |
| Graph of data |
| Reselect period |

| Date | Time | ? Water-level date-time accuracy | ? Parameter code | Water level, feet below land surface | Water level, feet above specific vertical datum | Referenced vertical datum | ? Status | ? Method of measurement | ? Measuring agency | ? Source measur |
|---|---|---|---|---|---|---|---|---|---|---|
| 1981-05-01 | | D | 62610 | | 3050.88 | NGVD29 | 1 | Z | | |
| 1981-05-01 | | D | 62611 | | 3052.48 | NAVD88 | 1 | Z | | |
| 1981-05-01 | | D | 72019 | 17.52 | | | 1 | Z | | |
| 1983-01-25 | | D | 62610 | | 3052.15 | NGVD29 | 1 | Z | | |
| 1983-01-25 | | D | 62611 | | 3053.75 | NAVD88 | 1 | Z | | |
| 1983-01-25 | | D | 72019 | 16.25 | | | 1 | Z | | |
| 1987-10-13 | | D | 62610 | | 3053.27 | NGVD29 | 1 | Z | | |
| 1987-10-13 | | D | 62611 | | 3054.87 | NAVD88 | 1 | Z | | |
| 1987-10-13 | | D | 72019 | 15.13 | | | 1 | Z | | |
| 1992-11-03 | | D | 62610 | | 3050.77 | NGVD29 | 1 | S | | |
| 1992-11-03 | | D | 62611 | | 3052.37 | NAVD88 | 1 | S | | |
| 1992-11-03 | | D | 72019 | 17.63 | | | 1 | S | | |
| 1998-01-22 | | D | 62610 | | 3052.05 | NGVD29 | 1 | S | | |
| 1998-01-22 | | D | 62611 | | 3053.65 | NAVD88 | 1 | S | | |
| 1998-01-22 | | D | 72019 | 16.35 | | | 1 | S | | |

**Explanation**

| Section | Code | Description |
|---|---|---|
| Water-level date-time accuracy | D | Date is accurate to the Day |
| Parameter code | 62610 | Groundwater level above NGVD 1929, feet |
| Parameter code | 62611 | Groundwater level above NAVD 1988, feet |
| Parameter code | 72019 | Depth to water level, feet below land surface |
| Referenced vertical datum | NAVD88 | North American Vertical Datum of 1988 |
| Referenced vertical datum | NGVD29 | National Geodetic Vertical Datum of 1929 |
| Status | 1 | Static |
| Method of measurement | S | Steel-tape measurement. |
| Method of measurement | Z | Other. |
| Measuring agency | | Not determined |
| Source of measurement | | Not determined |
| Water-level approval status | A | Approved for publication -- Processing and review completed. |

---

Questions or Comments
Help
Data Tips
Explanation of terms
Subscribe for system changes

Accessibility FOIA Privacy Policies and Notices

U.S. Department of the Interior | U.S. Geological Survey

**Title: Groundwater for New Mexico: Water Levels**
**URL: https://nwis.waterdata.usgs.gov/nm/nwis/gwlevels?**

Page Contact Information: New Mexico Water Data Maintainer
Page Last Modified: 2025-04-30 16:11:31 EDT
0.36 0.28 nadww02

*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 smallest to largest) (meters) (In feet)

| POD Number | Code | Sub basin | County | Q64 | Q16 | Q4 | Sec | Tws | Range | X | Y | Map | Distance | Well Depth | Depth Water | Water Column |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| C 02475 | | CUB | ED | | NE | SE | 13 | 26S | 27E | 581450.0 | 3545252.0 * | | 990 | 100 | | |
| C 02476 | | CUB | ED | | SE | NW | 24 | 26S | 27E | 580653.0 | 3544032.0 * | | 1866 | 150 | | |
| C 04466 POD1 | | CUB | ED | SW | SW | NE | 29 | 26S | 28E | 584327.2 | 3542357.4 | | 3165 | 96 | 33 | 63 |

Average Depth to Water: **33 feet**

Minimum Depth: **33 feet**

Maximum Depth: **33 feet**

**Record Count:** 3

**Basin/County Search:**
**County:** ED

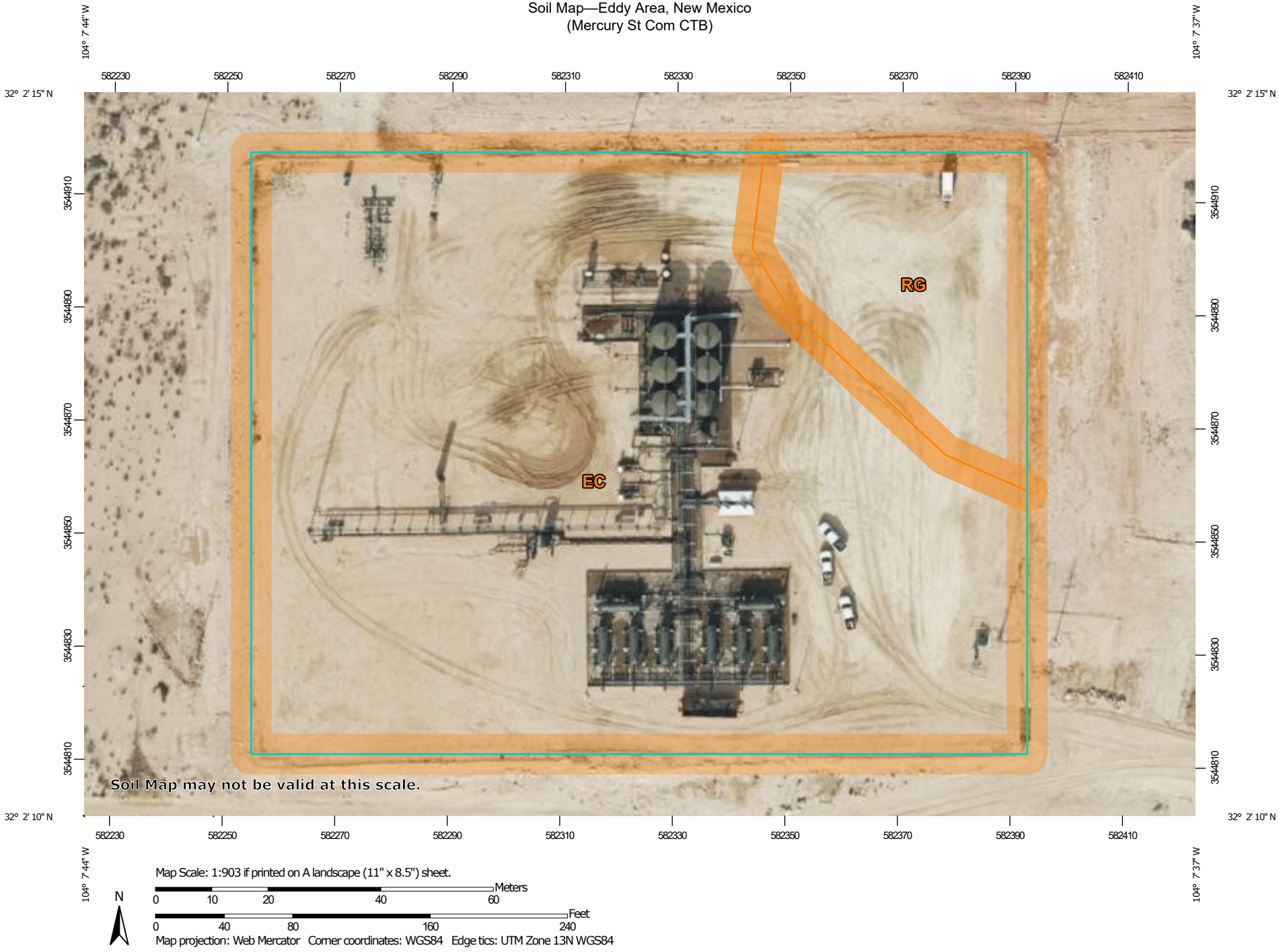
**UTM Filters (in meters):**
**Easting:** 582343
**Northing:** 3544824
**Radius:** 4000

*** UTM location was derived from PLSS - see Help**

# Attachment B

## Site Characterization Documentation

Soil Map—Eddy Area, New Mexico
(Mercury St Com CTB)



Soil Map—Eddy Area, New Mexico
(Mercury St Com CTB)

## MAP LEGEND

**Area of Interest (AOI)**
- Area of Interest (AOI)

**Soils**
- Soil Map Unit Polygons
- Soil Map Unit Lines
- Soil Map Unit Points

**Special Point Features**
- Blowout
- Borrow Pit
- Clay Spot
- Closed Depression
- Gravel Pit
- Gravelly Spot
- Landfill
- Lava Flow
- Marsh or swamp
- Mine or Quarry
- Miscellaneous Water
- Perennial Water
- Rock Outcrop
- Saline Spot
- Sandy Spot
- Severely Eroded Spot
- Sinkhole
- Slide or Slip
- Sodic Spot
- Spoil Area
- Stony Spot
- Very Stony Spot
- Wet Spot
- Other
- Special Line Features

**Water Features**
- Streams and Canals

**Transportation**
- Rails
- Interstate Highways
- US Routes
- Major Roads
- Local Roads

**Background**
- Aerial Photography

## MAP INFORMATION

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

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

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

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

Source of Map: Natural Resources Conservation Service
Web Soil Survey URL:
Coordinate System: Web Mercator (EPSG:3857)

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

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

Soil Survey Area: Eddy Area, New Mexico
Survey Area Data: Version 20, Sep 3, 2024

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

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

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

# Map Unit Legend

| Map Unit Symbol | Map Unit Name | Acres in AOI | Percent of AOI |
|---|---|---|---|
| EC | Ector stony loam, 0 to 9 percent slopes | 3.1 | 85.8% |
| RG | Reeves-Gypsum land complex, 0 to 3 percent slopes | 0.5 | 14.2% |
| **Totals for Area of Interest** | | **3.6** | **100.0%** |

# Eddy Area, New Mexico

## EC—Ector stony loam, 0 to 9 percent slopes

### Map Unit Setting

*National map unit symbol:* 1w4b
*Elevation:* 3,300 to 4,800 feet
*Mean annual precipitation:* 10 to 18 inches
*Mean annual air temperature:* 58 to 62 degrees F
*Frost-free period:* 195 to 210 days
*Farmland classification:* Not prime farmland

### Map Unit Composition

*Ector and similar soils:* 100 percent
*Estimates are based on observations, descriptions, and transects of the mapunit.*

### Description of Ector

#### Setting

*Landform:* Hills, ridges
*Landform position (two-dimensional):* Shoulder, backslope, footslope, toeslope
*Landform position (three-dimensional):* Head slope, nose slope, side slope, crest
*Down-slope shape:* Convex
*Across-slope shape:* Linear
*Parent material:* Residuum weathered from limestone

#### Typical profile

*H1 - 0 to 6 inches:* very cobbly loam
*H2 - 6 to 60 inches:* bedrock

#### Properties and qualities

*Slope:* 0 to 9 percent
*Depth to restrictive feature:* 4 to 20 inches to lithic bedrock
*Drainage class:* Well drained
*Runoff class:* Medium
*Capacity of the most limiting layer to transmit water (Ksat):* Moderately low to high (0.06 to 2.00 in/hr)
*Depth to water table:* More than 80 inches
*Frequency of flooding:* None
*Frequency of ponding:* None
*Calcium carbonate, maximum content:* 60 percent
*Maximum salinity:* Nonsaline to slightly saline (0.0 to 4.0 mmhos/cm)
*Sodium adsorption ratio, maximum:* 1.0
*Available water supply, 0 to 60 inches:* Very low (about 0.5 inches)

#### Interpretive groups

*Land capability classification (irrigated):* None specified
*Land capability classification (nonirrigated):* 7s

*Hydrologic Soil Group:* D
*Ecological site:* R042CY158NM - Very Shallow
*Hydric soil rating:* No

## Data Source Information

Soil Survey Area: Eddy Area, New Mexico
Survey Area Data: Version 20, Sep 3, 2024

# Eddy Area, New Mexico

## RG—Reeves-Gypsum land complex, 0 to 3 percent slopes

### Map Unit Setting

*National map unit symbol:* 1w5f
*Elevation:* 1,250 to 5,000 feet
*Mean annual precipitation:* 10 to 25 inches
*Mean annual air temperature:* 57 to 70 degrees F
*Frost-free period:* 190 to 235 days
*Farmland classification:* Not prime farmland

### Map Unit Composition

*Reeves and similar soils:* 55 percent
*Gypsum land:* 30 percent
*Minor components:* 15 percent
*Estimates are based on observations, descriptions, and transects of the mapunit.*

### Description of Reeves

#### Setting

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

#### Typical profile

*H1 - 0 to 8 inches:* loam
*H2 - 8 to 32 inches:* clay loam
*H3 - 32 to 60 inches:* gypsiferous material

#### Properties and qualities

*Slope:* 0 to 1 percent
*Depth to restrictive feature:* More than 80 inches
*Drainage class:* Well drained
*Runoff class:* High
*Capacity of the most limiting layer to transmit water (Ksat):* Very low to moderately low (0.00 to 0.06 in/hr)
*Depth to water table:* More than 80 inches
*Frequency of flooding:* None
*Frequency of ponding:* None
*Calcium carbonate, maximum content:* 25 percent
*Gypsum, maximum content:* 80 percent
*Maximum salinity:* Very slightly saline to moderately saline (2.0 to 8.0 mmhos/cm)
*Sodium adsorption ratio, maximum:* 4.0
*Available water supply, 0 to 60 inches:* Low (about 4.3 inches)

**Interpretive groups**

*Land capability classification (irrigated):* 3s
*Land capability classification (nonirrigated):* 7s
*Hydrologic Soil Group:* B
*Ecological site:* R070BC007NM - Loamy
*Hydric soil rating:* No

**Description of Gypsum Land**

**Setting**

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

**Interpretive groups**

*Land capability classification (irrigated):* None specified
*Land capability classification (nonirrigated):* 8s
*Hydric soil rating:* No

**Minor Components**

**Largo**

*Percent of map unit:* 5 percent
*Ecological site:* R070BC007NM - Loamy
*Hydric soil rating:* No

**Reagan**

*Percent of map unit:* 5 percent
*Ecological site:* R070BC007NM - Loamy
*Hydric soil rating:* No

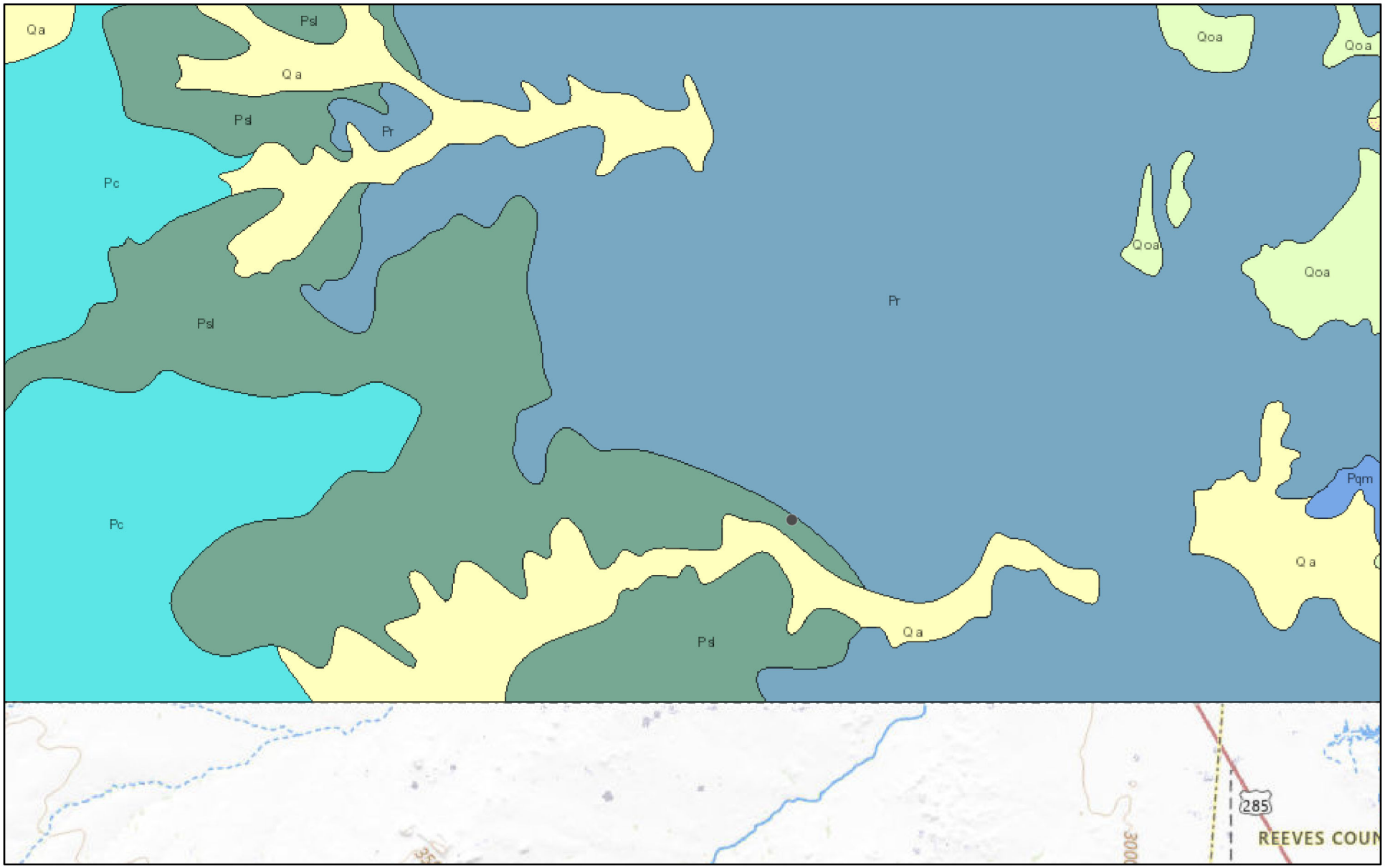
**Cottonwood**

*Percent of map unit:* 5 percent
*Ecological site:* R070BC033NM - Salty Bottomland
*Hydric soil rating:* No

# Data Source Information

Soil Survey Area: Eddy Area, New Mexico
Survey Area Data: Version 20, Sep 3, 2024

# Mercury State Com CTB




6/6/2025, 9:31:35 AM

1:144,448

0 1 2 4 mi

0 1.5 3 6 km

Lithologic Units

- Playa—Alluvium and evaporite deposits (Holocene)
- Water—Perenial standing water
- Qa—Alluvium (Holocene to upper Pleistocene)

Esri, NASA, NGA, USGS, USGS The National Map: National Boundaries Dataset, 3DEP Elevation Program, Geographic Names Information System,

ArcGIS Web AppBuilder

USGS The National Map: National Boundaries Dataset, 3DEP Elevation Program, Geographic Names Information System, National Hydrography Dataset, National Land Cover Database, National Structures Dataset, and National Transportation Dataset; USGS Global

# Karst Potential Map

6/6/2025, 9:34:45 AM

Karst Occurrence Potential Medium

High

1:9,028

0 0.05 0.1 0.2 mi

0 0.1 0.2 0.4 km

BLM, OCD, New Mexico Tech, Maxar

New Mexico Oil Conservation Division

NM OCD Oil and Gas Map. http://nm-emnrd.maps.arcgis.com/apps/webappviewer/index.html?id=4d017f2306164de29fd2fb9f8f35ca75: New Mexico Oil Conservation Division

U.S. Fish and Wildlife Service
National Wetlands Inventory

# Mercury State Com CTB


April 30, 2025

**Wetlands**

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

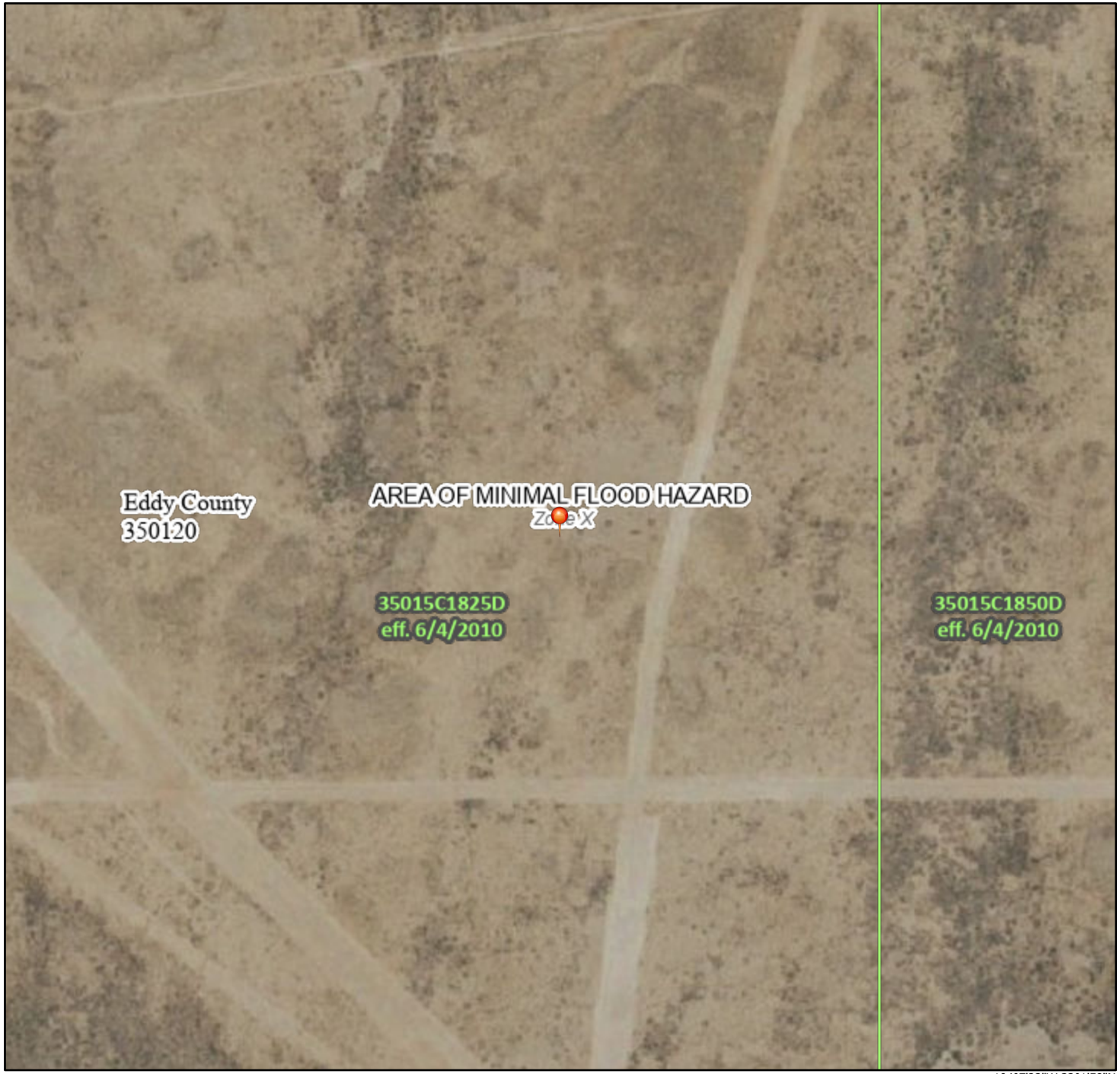
This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

National Wetlands Inventory (NWI)
This page was produced by the NWI mapper

# National Flood Hazard Layer FIRMette

FEMA

104°8'W 32°2'28"N




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

1:6,000

104°7'22"W 32°1'58"N

Basemap Imagery Source: USGS National Map 2023

## Legend

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

**SPECIAL FLOOD HAZARD AREAS**
- Without Base Flood Elevation (BFE) *Zone A, V, A99*
- With BFE or Depth *Zone AE, AO, AH, VE, AR*
- Regulatory Floodway

**OTHER AREAS OF FLOOD HAZARD**
- 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile *Zone X*
- Future Conditions 1% Annual Chance Flood Hazard *Zone X*
- Area with Reduced Flood Risk due to Levee. See Notes. *Zone X*
- Area with Flood Risk due to Levee *Zone D*

**OTHER AREAS**
- NO SCREEN Area of Minimal Flood Hazard *Zone X*
- Effective LOMRs
- Area of Undetermined Flood Hazard *Zone D*

**GENERAL STRUCTURES**
- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

**OTHER FEATURES**
- 20.2 Cross Sections with 1% Annual Chance
- 17.5 Water Surface Elevation
- Coastal Transect
- 513 Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature

**MAP PANELS**
- Digital Data Available
- No Digital Data Available
- Unmapped

N

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 5/1/2025 at 4:02 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.

# Attachment C

## Photographic Documentation

ConocoPhillips Company
CoP – Mercury State Com CTB
Incident No. naPP2507434560
Eddy County, New Mexico


*Photo 1* *View of north side secondary containment towards west.*

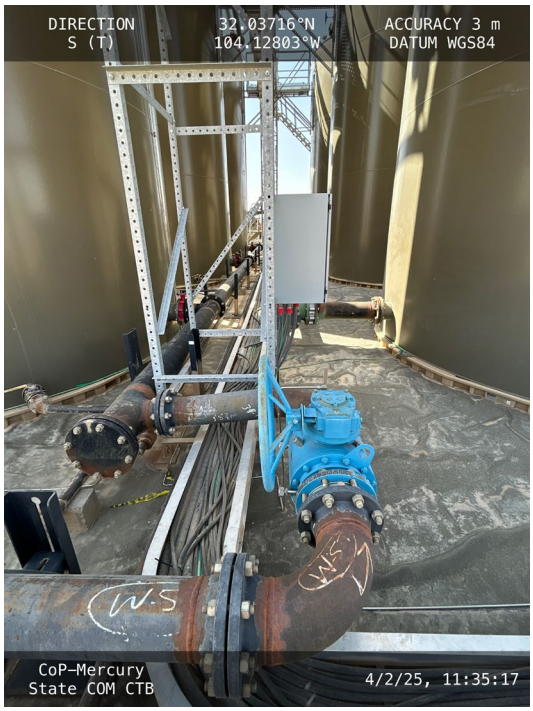



*Photo 2* *View of central portion of secondary containment towards south.*


*Photo 3* *View of north side secondary containment towards east.*


*Photo 4* *View of southwest corner secondary containment.*

ConocoPhillips Company
CoP – Mercury State Com CTB
Incident No. naPP2507434560
Eddy County, New Mexico


*Photo 5* *View of central portion of secondary containment.*


*Photo 6* *View of west side secondary containment towards south.*


*Photo 7* *View of central portion of secondary containment towards south.*

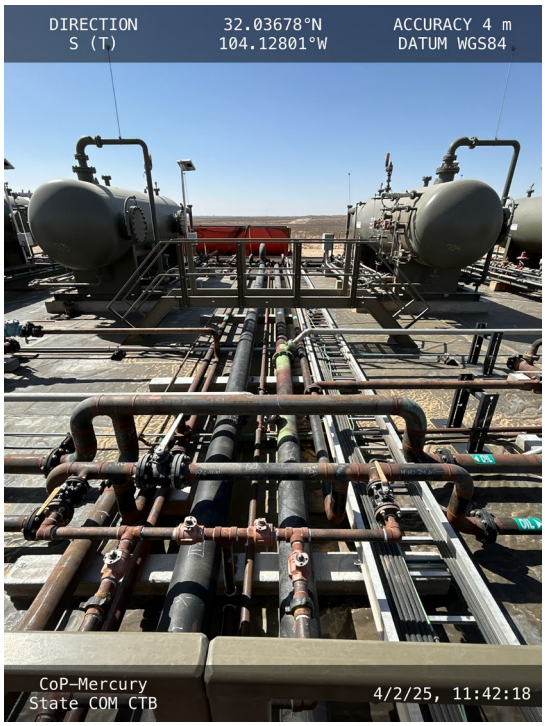



*Photo 8* *View of central portion of secondary containment towards south.*

ConocoPhillips Company
CoP – Mercury State Com CTB
Incident No. naPP2507434560
Eddy County, New Mexico


*Photo 9* *View of north side secondary containment towards east.*


*Photo 10* *View of northside secondary containment towards west.*


*Photo 11* *View of west side secondary containment towards south.*


*Photo 12* *View of central portion of secondary containment towards west.*

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*Photo 13* *View of east side secondary containment towards south.*


*Photo 14* *View of central portion of secondary containment towards west.*

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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

Action 472616

## QUESTIONS

| | |
|---|---|
| Operator:<br>COG OPERATING LLC<br>600 W Illinois Ave<br>Midland, TX 79701 | OGRID:<br>229137 |
| | Action Number:<br>472616 |
| | Action Type:<br>[C-141] Remediation Closure Request C-141 (C-141-v-Closure) |

**QUESTIONS**

| **Prerequisites** | |
|---|---|
| Incident ID (n#) | **nAPP2507434560** |
| Incident Name | **NAPP2507434560 MERCURY STATE COM CTB @ 0** |
| Incident Type | **Produced Water Release** |
| Incident Status | **Remediation Closure Report Received** |
| Incident Facility | **[fAPP2203555433] MERCURY ST COM CTB** |

| **Location of Release Source** | |
|---|---|
| *Please answer all the questions in this group.* | |
| Site Name | MERCURY STATE COM CTB |
| Date Release Discovered | 03/15/2025 |
| 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: Corrosion \| Valve \| Produced Water \| Released: 38 BBL (Unknown Released Amount) \| Recovered: 38 BBL \| Lost: 0 BBL. |
| Is the concentration of chloride in the produced water >10,000 mg/l | Yes |
| Condensate Released (bbls) Details | *Not answered.* |
| Natural Gas Vented (Mcf) Details | *Not answered.* |
| Natural Gas Flared (Mcf) Details | *Not answered.* |
| Other Released Details | *Not answered.* |
| Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts) | *Not answered.* |

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## QUESTIONS (continued)

| | |
|---|---|
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**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:**<br>**(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 | *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: Brittany Esparza<br>Title: Environmental Technician<br>Email: brittany.Esparza@ConocoPhillips.com<br>Date: 06/10/2025 |

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## QUESTIONS (continued)

| | |
|---|---|
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| | Action Number:<br>472616 |
| | Action Type:<br>[C-141] Remediation Closure Request C-141 (C-141-v-Closure) |

**QUESTIONS**

| **Site Characterization** | |
|---|---|
| *Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.* | |
| What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs) | Less than or equal 25 (ft.) |
| What method was used to determine the depth to ground water | NM OSE iWaters Database Search |
| Did this release impact groundwater or surface water | No |
| **What is the minimum distance, between the closest lateral extents of the release and the following surface areas:** | |
| A continuously flowing watercourse or any other significant watercourse | Between 500 and 1000 (ft.) |
| Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark) | Between 500 and 1000 (ft.) |
| An occupied permanent residence, school, hospital, institution, or church | Greater than 5 (mi.) |
| A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes | Between ½ and 1 (mi.) |
| Any other fresh water well or spring | Between ½ and 1 (mi.) |
| Incorporated municipal boundaries or a defined municipal fresh water well field | Greater than 5 (mi.) |
| A wetland | Between 500 and 1000 (ft.) |
| A subsurface mine | Greater than 5 (mi.) |
| An (non-karst) unstable area | Greater than 5 (mi.) |
| Categorize the risk of this well / site being in a karst geology | High |
| A 100-year floodplain | Between 500 and 1000 (ft.) |
| Did the release impact areas not on an exploration, development, production, or storage site | No |

| **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 | Yes |
| *Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.* | |
| On what estimated date will the remediation commence | 04/02/2025 |
| On what date will (or did) the final sampling or liner inspection occur | 04/02/2025 |
| On what date will (or was) the remediation complete(d) | 04/02/2025 |
| What is the estimated surface area (in square feet) that will be remediated | 7000 |
| 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.* | |

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## QUESTIONS (continued)

| | |
|---|---|
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**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.)* | |
| 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) | *Not answered.* |
| *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: Brittany Esparza<br>Title: Environmental Technician<br>Email: brittany.Esparza@ConocoPhillips.com<br>Date: 06/10/2025 |
| *The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.* | |

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## QUESTIONS (continued)

| | |
|---|---|
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| | Action Number:<br>472616 |
| | Action Type:<br>[C-141] Remediation Closure Request C-141 (C-141-v-Closure) |

**QUESTIONS**

| **Liner Inspection Information** | |
|---|---|
| Last liner inspection notification (C-141L) recorded | **447018** |
| Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC | **04/02/2025** |
| Was all the impacted materials removed from the liner | **Yes** |
| What was the liner inspection surface area in square feet | **7000** |

| **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 | **Yes** |
| What was the total surface area (in square feet) remediated | 7000 |
| What was the total volume (cubic yards) remediated | 0 |
| Summarize any additional remediation activities not included by answers (above) | Liner Inspected |

*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: Brittany Esparza<br>Title: Environmental Technician<br>Email: brittany.Esparza@ConocoPhillips.com<br>Date: 06/10/2025 |

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## CONDITIONS

| | |
|---|---|
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| | Action Type:<br>[C-141] Remediation Closure Request C-141 (C-141-v-Closure) |

**CONDITIONS**

| Created By | Condition | Condition Date |
|---|---|---|
| scott.rodgers | App ID 472616 Liner Inspection approved | 6/13/2025 |