



June 25, 2025

District Supervisor  
Oil Conservation Division, District 1  
1625 North French Drive  
Hobbs, New Mexico 88240

**Re: REVISED Remediation Closure Report  
Reclamation Report  
ConocoPhillips Company (COG Production, LLC)  
Windward West CTB Release  
Unit Letter D, Section 30, Township 24 South, Range 32 East  
Lea County, New Mexico  
Incident ID# NAPP2409948979**

Sir or Madam:

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips Company (ConocoPhillips) to assess a COG Production, LLC (Concho) release that occurred at a water transfer line associated with the Windward West CTB Facility (fDHR1921042438). The release footprint is located in Public Land Survey System (PLSS) Unit Letter D, Section 30, Township 24 South, Range 32 East, in Lea County, New Mexico (Site). The approximate release point occurred at coordinates 32.194533°, -103.719506°, as shown on Figures 1 and 2.

## BACKGROUND

According to the New Mexico Oil Conservation Division (NMOCD) C-141 Initial Report, the release was discovered on April 1, 2024 and was caused by a hole in a water transfer line. The release consisted of 12.7488 barrels (bbls) of produced water, of which 10 bbls were reported recovered. The release occurred off pad. The NMOCD received the initial C-141 on April 8, 2024, and subsequently assigned the release the Incident ID NAPP2409948979. The initial C-141 form is included in Appendix A.

## LAND OWNERSHIP

According to the NMOCD Oil and Gas Map, the Site is located on federal lands managed by the Bureau of Land Management (BLM). This Report will be provided to the BLM for review and approval.

## SITE CHARACTERIZATION

A 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 in an area of low karst potential.

According to the New Mexico Office of the State Engineers (NMOSE) reporting system, there is one (1) water well located within ½ mile (800 meters) of the Site at a depth of 120 feet bgs with no groundwater elevation reported. This dry water well provides a reasonable determination to establish groundwater as greater than 100 bgs in the ½ mile radius. The minimum depth to groundwater based on data from one (1)

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well located approximately 1.26 miles (2,028 meters) away from the Site is 135 feet below ground surface (bgs). The site characterization data are presented in Appendix B.

## REGULATORY FRAMEWORK

Based upon the release footprint location and in accordance with Subsection E of 19.15.29.12 NMAC, per 19.15.29.11 NMAC, the site characterization data was used to determine recommended remedial action levels (RRALs) for benzene, toluene, ethylbenzene, and xylene (collectively referred to as BTEX), total petroleum hydrocarbons (TPH), and chlorides in soil.

Based on the site characterization, depth to groundwater, and in accordance with Table I of 19.15.29.12 NMAC, the recommended remedial action levels (RRALs) for the Site are as follows:

Constituent	Site RRALs
Chloride	20,000 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 ft bgs) outside of active oil and gas operations are as follows:

Constituent	Reclamation Requirements
Chloride	600 mg/kg
TPH	100 mg/kg

## INITIAL RESPONSE AND REMEDIAL ACTIVITIES

In accordance with 19.15.29.8. B. (4) NMAC that states “the responsible party may commence remediation immediately after discovery of a release,” ConocoPhillips elected to begin remediation of the impacted area in April 2024. The visibly impacted material was initially excavated by scraping the surface to a depth of 1 foot bgs. The initial response extent is indicated in Figure 3.

## INITIAL SITE ASSESSMENT

On April 24, 2024, Tetra Tech was onsite to conduct assessment activities on behalf of ConocoPhillips. Tetra Tech personnel oversaw the installation of three (3) trenches (T-1 through T-3) to various depths ranging from 4 to 8 feet bgs within the release extent. Five (5) hand auger borings (AH-1 through AH-5) were installed along the perimeter of the release extent to 1-foot bgs.

A total of sixteen (16) soil samples were collected from the trenches and borings and sent to Cardinal Laboratories in Hobbs, New Mexico (Cardinal) to be analyzed for chloride via Standard Method 4500Cl-B, TPH via EPA Method 8015M, and BTEX via EPA Method 8021B. Analytical results from the April 2024 assessment activities are summarized in Table 1. Analytical results associated with sample locations T-1 exceeded the reclamation limit for TPH (100 mg/kg) in surface soils to 4 feet bgs. Horizontal delineation was completed as a result of the assessment sampling event; however, vertical delineation was not achieved at T-1. The sampling locations are presented in Figure 3.

## SUBSEQUENT RELEASE

Following the April 2024 release and assessment activities, another release (associated with the Windward Federal #002H) occurred on May 3, 2024, along the same water transfer line. This subsequent release

footprint (associated with Incident ID nAPP2413732369), partially overlapped the April 2024 release footprint.

According to the NMOCD C-141 Initial Report, the May 2024 release was caused by a hole in the water transfer line and consisted of 4.1217 bbls of produced water, of which none were recovered. The NMOCD received the initial C-141 on May 16, 2024, and subsequently assigned the release the Incident ID nAPP2413732369. Figure 4 depicts both the April and May 2024 release extents.

## ADDITIONAL ASSESSMENT ACTIVITIES

Following the May 2024 release, Tetra Tech, on behalf of ConocoPhillips, conducted additional assessment activities within and around the individual release extents to evaluate current soil concentration levels and guide the proposed remediation. On July 24, 2024, Tetra Tech personnel re-mobilized to the Site with a drilling rig and oversaw the installation of six (6) boreholes (BH-1 through BH-6) and installed six (6) hand auger borings (AH-24-1 and H-1 through H-5) in the vicinity of the release area footprints. The July 2024 sampling locations are presented in Figure 4.

A total of thirty-four (34) soil samples were collected and sent to Cardinal to be analyzed for chloride via Standard Method 4500Cl-B, TPH via EPA Method 8015M, and BTEX via EPA Method 8021B. Analytical results from the July 2024 soil assessment are summarized in Table 2. Chloride concentrations were detected in surface soils (0-4 feet bgs) at five boring locations and one hand auger location at levels above the reclamation limit of 600 mg/kg. There were no analytical results exceeding the chloride RRAL of 20,000 mg/kg. All analytical results were below the reclamation limits and Site RRALs for all other constituents. Following the July 2024 assessment activities, the release extents were considered fully delineated.

## REMEDIATION WORK PLAN AND REGULATORY APPROVAL

Tetra Tech, on behalf of ConocoPhillips, prepared a Remediation Work Plan dated September 12, 2024 and submitted it to the NMOCD and the BLM for approval. A separate work plan was submitted to the NMOCD for the second (May 2024) release (Incident ID nAPP2413732369).

The Remediation Work Plan was approved via email by Shelly Wells of the NMOCD on September 17, 2024, with the following conditions:

- *“Remediation plan approved with conditions. Confirmation samples are to be collected every 200 square feet from the base and walls of the excavation. Submit remediation closure report to the OCD by 12/16/2024.”*

The Remediation Work Plan was submitted to the BLM via email on September 25, 2024, and approved by Crisha Morgan on October 11, 2024.

## 2024 REMEDIATION/RECLAMATION ACTIVITIES

From October 15-23, 2024, Tetra Tech personnel were onsite to supervise the remedial activities proposed in the approved Remediation Work Plan, including excavation, disposal, and confirmation sampling. Prior to confirmation sampling, on October 11, 2024, the NMOCD district office was first notified via the OCD Portal in accordance with Subsection D of 19.15.29.12 NMAC. An additional C-141N was submitted to continue confirmation sampling on October 17, 2024. Regulatory correspondence is included in Appendix C.

Impacted soils were excavated as indicated in Figure 5. The areas within the release footprint were excavated to a maximum depth of 4 feet below surrounding grade. Due to safety concerns associated with working around pressurized lines, impacted soils were excavated by hand or hydro-excavation within 4 feet of subsurface lines. Heavy machinery remained outside this buffer zone to avoid any associated risk or disturbance. Photographs from the excavated areas prior to backfill are provided in Appendix D.

Following excavation, confirmation floor and sidewall samples were collected from the entire remediated area and submitted for laboratory analysis to verify efficacy of remediation activities. Per the NMOCD approved confirmation sampling plan, confirmation samples were collected such that each discrete sample (sidewall and floor) was representative of no more than 200 square feet of excavated area. A total of seven (7) confirmation floor sample locations and eight (8) confirmation sidewall sample locations were collected for laboratory analysis during remedial activities. Confirmation sidewall sample locations were categorized with the cardinal direction (N, E, S, W) followed by SW-#. Confirmation floor sample locations were labeled with FS-#. Final excavated areas, depths and confirmation sample locations are indicated in Figure 5.

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

The results of the October 2024 confirmation sampling events are summarized in Table 3. All final confirmation soil samples (floor and sidewall) were below the applicable cleanup levels for all analyzed constituents. Copies of laboratory analysis and chain-of-custody documentation are included in Appendix E. All excavated material was transported offsite for proper disposal. Approximately 305 cubic yards of material (soil and hydrovac slurry) were transported to the Northern Delaware Basin Landfill facility in Jal, NM.

Once acceptable confirmation sample results were received, the excavation was backfilled with clean material to pre-release grade. In accordance with 19.15.29.12 NMAC, the reclaimed area contained a minimum of four feet of non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg as analyzed by EPA Method SM4500Cl-B. The soil cover included a top layer consisting of one foot of suitable material to establish vegetation at the site. The backfilled areas in the pasture were seeded following backfilling, to aid in revegetation. Based on the soils of the site, the BLM Seed Mix #2 was used for seeding and was planted in the amount specified in the pounds pure live seed (PLS) per acre. One (1) representative 5-point composite sample was collected from the backfill material used for the reclamation of the project site. Soil backfill composite sampling results are summarized in Table 4. Copies of laboratory analysis and chain-of-custody documentation are included in Appendix E.

## REMEDIATION CLOSURE AND REGULATORY REJECTION

Tetra Tech, on behalf of ConocoPhillips, prepared a Remediation and Reclamation Closure Report dated November 22, 2024, and submitted it to the NMOCD for approval. A separate report was submitted to the NMOCD for the second release (Incident ID nAPP2413732369).

The Remediation and Reclamation Closure Report was rejected via email by Shelly Wells of the NMOCD on December 10, 2025, with the following conditions:

- *“Remediation closure and reclamation denied for the following:*
  - *1)According to the remediation plan approved on 9/17/24 samples were to be analyzed for all constituents but on pg. 4 of report you state: “The soils samples were not analyzed for BTEX, in accordance with the 2024 Remediation Work Plan conditions of approval.” Remove conflicting information.*
  - *2)To the question “What is the estimated surface area (in square feet) that will be remediated” you answered 2383 which means at least 12 floor samples should have been collected from the excavation. In remediation plan approval on 9/17/24, you had requested to sample every 400 square feet and had proposed to collect 10 floor samples and 10 sidewall samples. The conditions of approval stated you were to sample every 200 square feet which should have resulted in more samples being collected than the requested 20.*
  - *3)In approved remediation plan, The Proposed Remediation Map, Figure 5 showed the excavation extending south past the point of release but Figure 5 in submitted closure*



*report shows the excavation did not extend through this area. Confirmation samples will need to be collected around points of release to ensure all contaminants are removed and entire release area meets reclamation standards.*

- *Resubmit remediation closure report to the OCD by 3/10/25.*

Comment #1 references a clerical error in the rejected closure report, as all collected confirmation samples from the previous remedial activities were indeed analyzed for TPH, BTEX and chloride. Comments #2 and #3 have been addressed by the additional remedial activities performed at the site. A 90-day extension was requested by Tetra Tech on March 4, 2025, and approved by the NMOCD. Copies of the regulatory correspondence are included in Appendix C.

## 2025 REMEDIATION ACTIVITIES

Based on Comment #3 in the OCD rejection, the initial site photographs of the release were reviewed and evaluated. It appears that the previous confusion at the site stemmed from the relocation of the water transfer line post-release. Additionally, the associated figures also did not accurately depict the orientation of this line or the power poles in the vicinity of the release. Based on figure revisions and the review of the initial photographs, Tetra Tech personnel remobilized to the site to evaluate conditions on the east side of the new location of the water transfer line. Tetra Tech personnel collected several surface and subsurface samples from this area to field screen for salinity using an ExStik. This work was completed to determine a more accurate footprint of the release on the east side of the water transfer line. From the field screening results, a clear depiction of the additional area required for remediation was discerned.

Based on these field screening results and the NMOCD rejection, Tetra Tech personnel were onsite from May 20 to May 23, 2025 to conduct additional excavation, disposal, and confirmation sampling in these areas. Prior to confirmation sampling, on May 15, 2025, the NMOCD district office was notified via the OCD Portal in accordance with Subsection D of 19.15.29.12 NMAC. Regulatory correspondence is included in Appendix C.

Impacted soils were excavated as indicated in Figure 6. The areas identified east and southeast of the release point were excavated to a maximum depth of 4 feet below surrounding grade. Due to safety concerns associated with working around pressurized lines, impacted soils were excavated by hand within 2 feet of the surface line within the release footprint/previous excavation extent. Heavy machinery remained outside this buffer zone to avoid any associated risk or disturbance. A 10-foot diameter buffer was established around the electrical pole, and heavy machinery remained outside this buffer zone. This area was excavated by hand to the maximum extent possible to limit hazardous risk associated with electrical lines and to safeguard the structural integrity of the pole itself. Photographs from the excavated areas prior to backfill are provided in Appendix D.

Following excavation, confirmation floor and sidewall samples were collected from the excavated area and submitted for laboratory analysis to verify efficacy of remediation activities. Per the NMOCD conditions of approval, confirmation samples were collected such that each sample (sidewall and floor) was representative of no more than 200 square feet of excavated area. The square footage of the additional area remediated was approximately 399 sf. A total of three (3) confirmation floor sample locations and four (4) confirmation sidewall sample locations were used for laboratory analysis during remedial activities. Confirmation sidewall sample locations were categorized with the cardinal direction (N, E, S, W) followed by SW-#. Confirmation floor sample locations were labeled with FS-#. Final excavated areas, depths and confirmation sample locations are indicated in Figure 6.

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

The results of the May 2025 confirmation sampling events are summarized in Table 5. All final confirmation soil samples (floor and sidewall) were below the applicable cleanup levels for all analyzed constituents. Copies of laboratory analysis and chain-of-custody documentation are included in Appendix E. All excavated material was transported offsite for proper disposal. Approximately 104 cubic yards of material were transported to the Northern Delaware Basin Landfill facility in Jal, NM.

## RECLAMATION ACTIVITIES

Based on 19.15.29.13 NMAC, areas disturbed by the remediation have been reclaimed. Collected confirmation samples were placed into laboratory-provided sample containers, transferred under chain-of-custody, and analyzed within appropriate holding times by Cardinal. The soil samples were analyzed for TPH (GRO+DRO+MRO) by EPA Method 8015M, BTEX by EPA Method 8021B, and chlorides by SM4500Cl-B. The analytical results were directly compared to the reclamation requirements and established Site RRALs to demonstrate compliance. All final confirmation soil samples (floor and sidewall) were below the reclamation limits for chloride, TPH, and BTEX. Excavated areas, depths and confirmation sample locations are indicated in Figure 6. The results of the May 2025 confirmation sampling event are summarized in Table 5.

Once acceptable confirmation sample results were received, the excavation was backfilled with clean material to pre-release grade. In accordance with 19.15.29.12 NMAC, the reclaimed area contained a minimum of four feet of non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg as analyzed by SM4500Cl-B. The soil cover included a top layer consisting of one foot of suitable material to establish vegetation at the site. The backfilled areas in the pasture were seeded following backfilling, to aid in revegetation. Based on the soils of the site, the BLM Seed Mix #2 was used for seeding and was planted in the amount specified in the pounds pure live seed (PLS) per acre. One (1) representative 5-point composite sample was collected from the backfill material used for the reclamation of the project site. Soil backfill composite sampling results are summarized in Table 6. Copies of laboratory analysis and chain-of-custody documentation are included in Appendix E.

Site inspections will be performed annually to assess the revegetation progress and evaluate the site for the presence of primary or secondary noxious weeds. If noxious weeds are identified, the NMSLO will be contacted to determine an effective method for eradication. If the site does not show revegetation after one growing season, the area will be reseeded as appropriate. Reclamation activities have been implemented in consultation with the BLM.

## CONCLUSION

ConocoPhillips respectfully requests closure of Incident ID NAPP2409948979 based on the confirmation sampling results and additional remedial activities performed. A closure report will be submitted to the NMOCD for the second release (Incident ID nAPP2413732369). The final C-141 forms are enclosed in Appendix A. If you have any questions concerning the additional remedial actions performed at the Site, please call me at (512) 596-8201.

Sincerely,  
**Tetra Tech, Inc.**



Lisbeth Chavira  
Project Manager



Christian M. Llull, P.G.  
Program Manager

cc:  
Mr. Ike Tavarez, RMR – ConocoPhillips;  
Ms. Crisha Morgan – BLM

## LIST OF ATTACHMENTS

### Figures:

- Figure 1 – Overview Map
- Figure 2 – Topographic Map
- Figure 3 – Approximate Release Extent with Initial Scrape and Assessment
- Figure 4 – Approximate Release Extent and Additional Assessment
- Figure 5 – 2024 Remediation Extents and Confirmation Sampling Locations
- Figure 6 – 2025 Additional Remediation Extents and Confirmation Sampling Locations

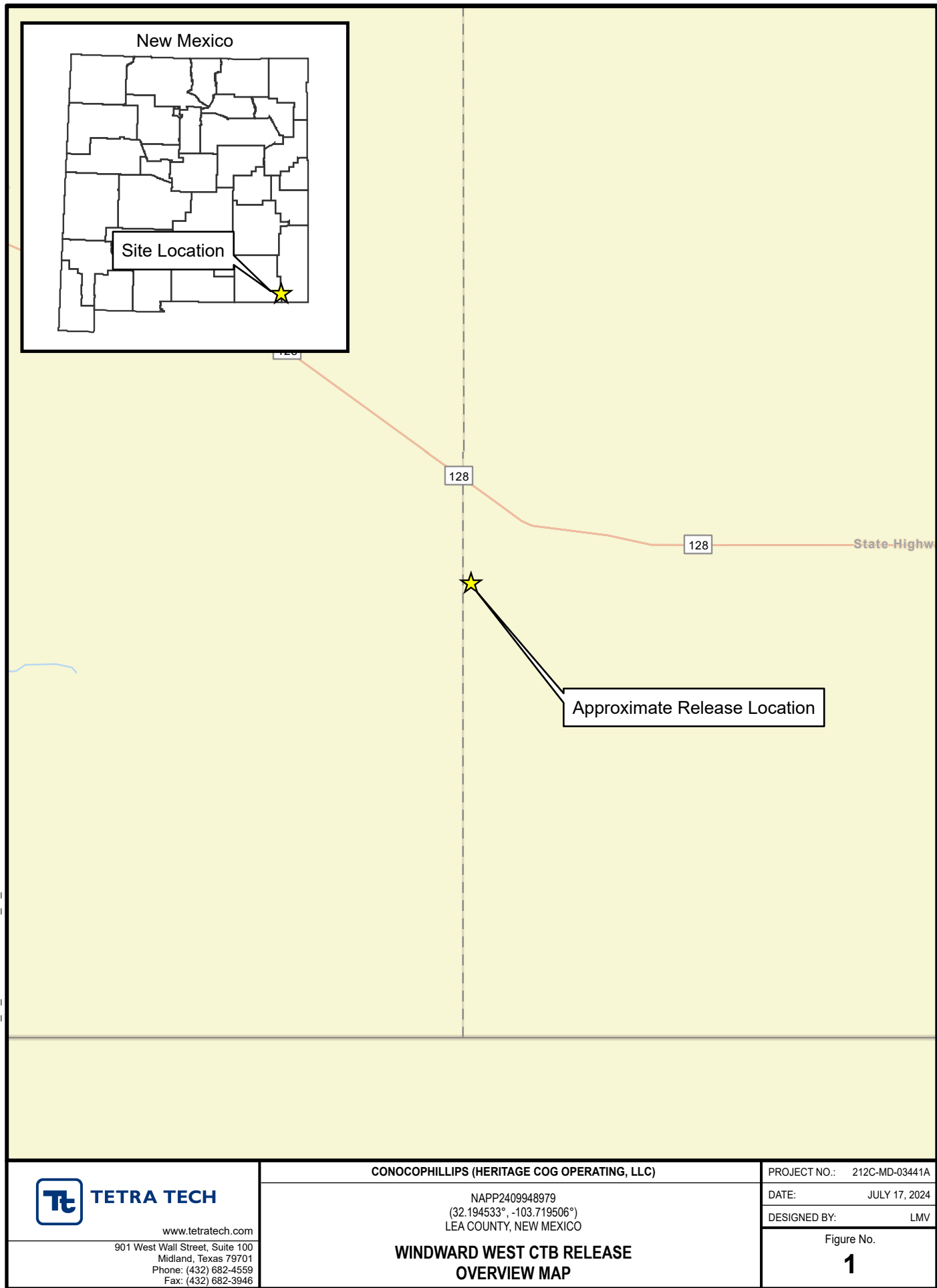
### Tables:

- Table 1 – Summary of Analytical Results – 2024 Initial Soil Assessment
- Table 2 – Summary of Analytical Results – 2024 Additional Soil Assessment
- Table 3 – Summary of Analytical Results – 2024 Soil Remediation
- Table 4 – Summary of Analytical Results – Soil Backfill
- Table 5 – Summary of Analytical Results – 2025 Soil Remediation

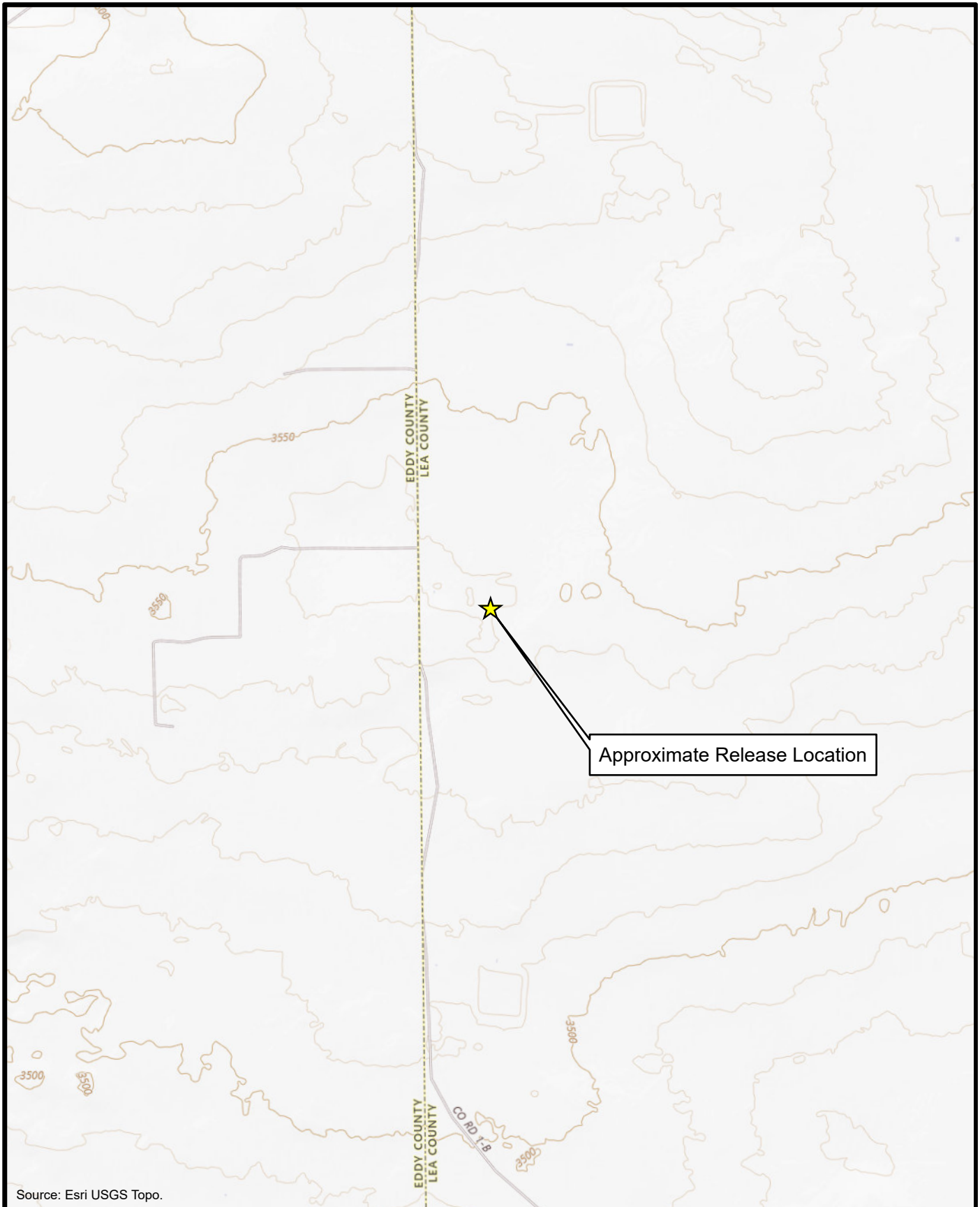
### Appendices:

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

## **FIGURES**







Source: Esri USGS Topo.



**TETRA TECH**

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**CONOCOPHILLIPS (HERITAGE COG OPERATING, LLC)**

NAPP2409948979  
(32.194533°, -103.719506°)  
LEA COUNTY, NEW MEXICO

**WINDWARD WEST CTB RELEASE  
TOPOGRAPHIC MAP**

PROJECT NO.: 212C-MD-03441A

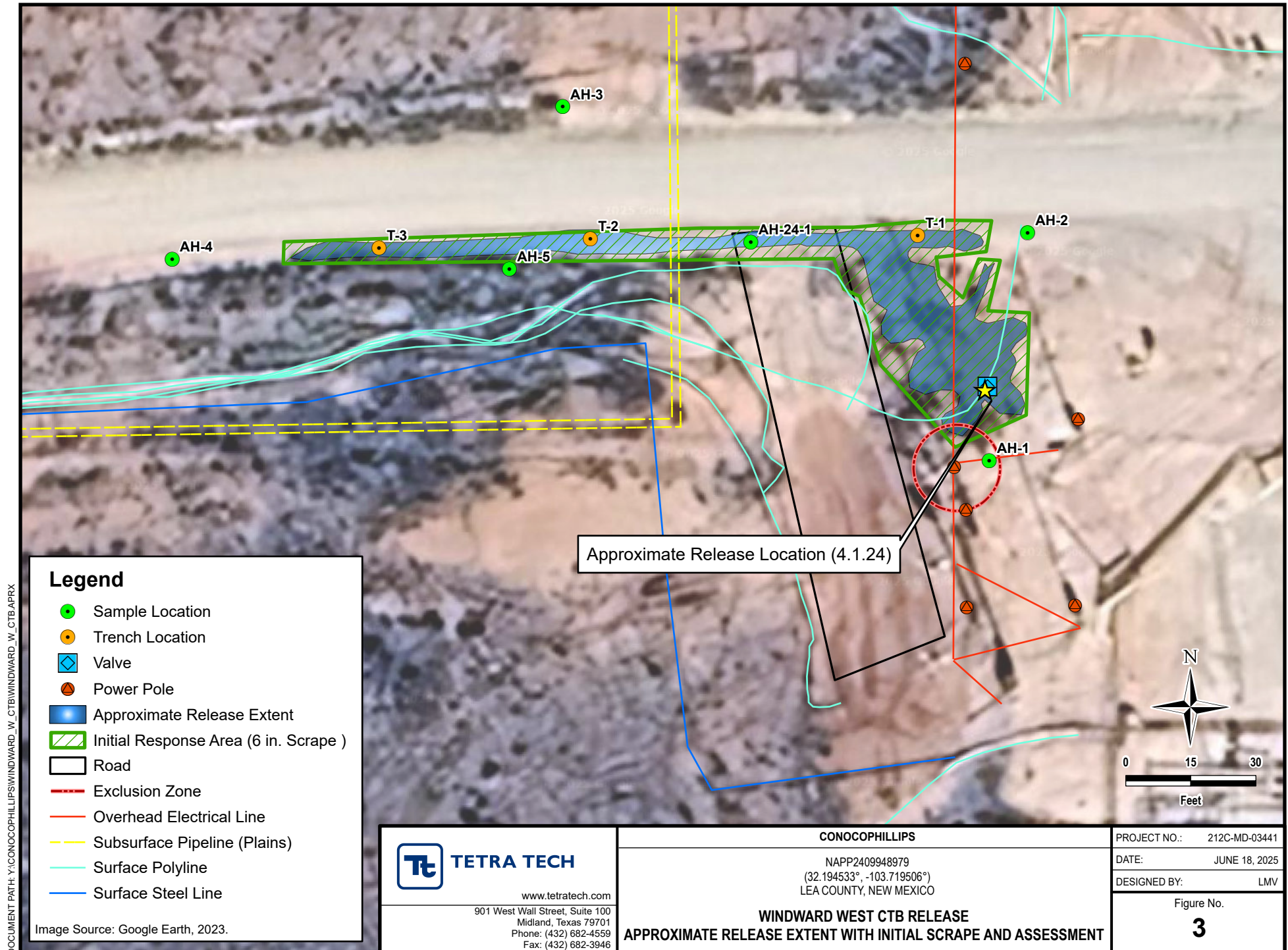
DATE: JULY 17, 2024

DESIGNED BY: LMV

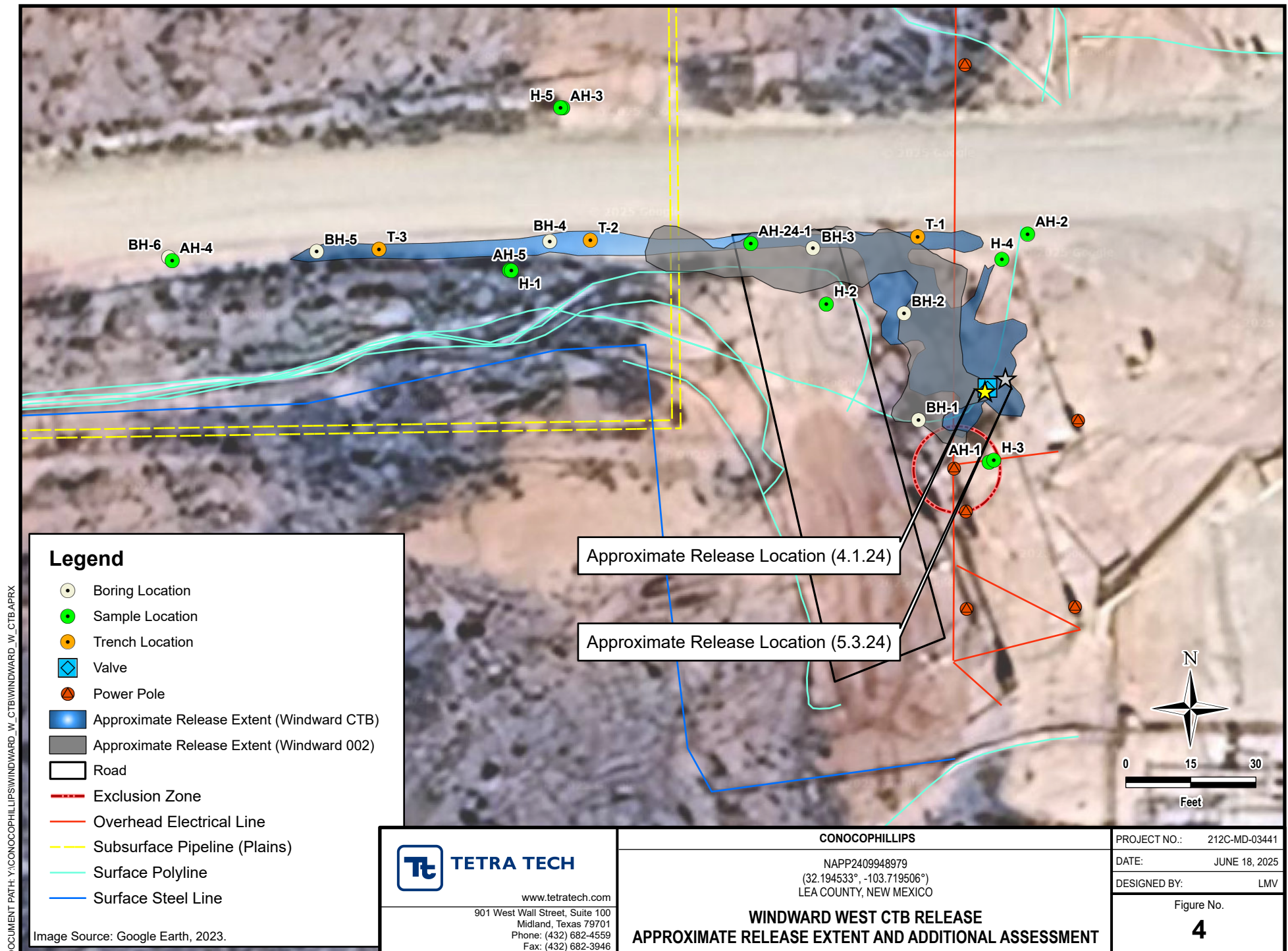
Figure No.

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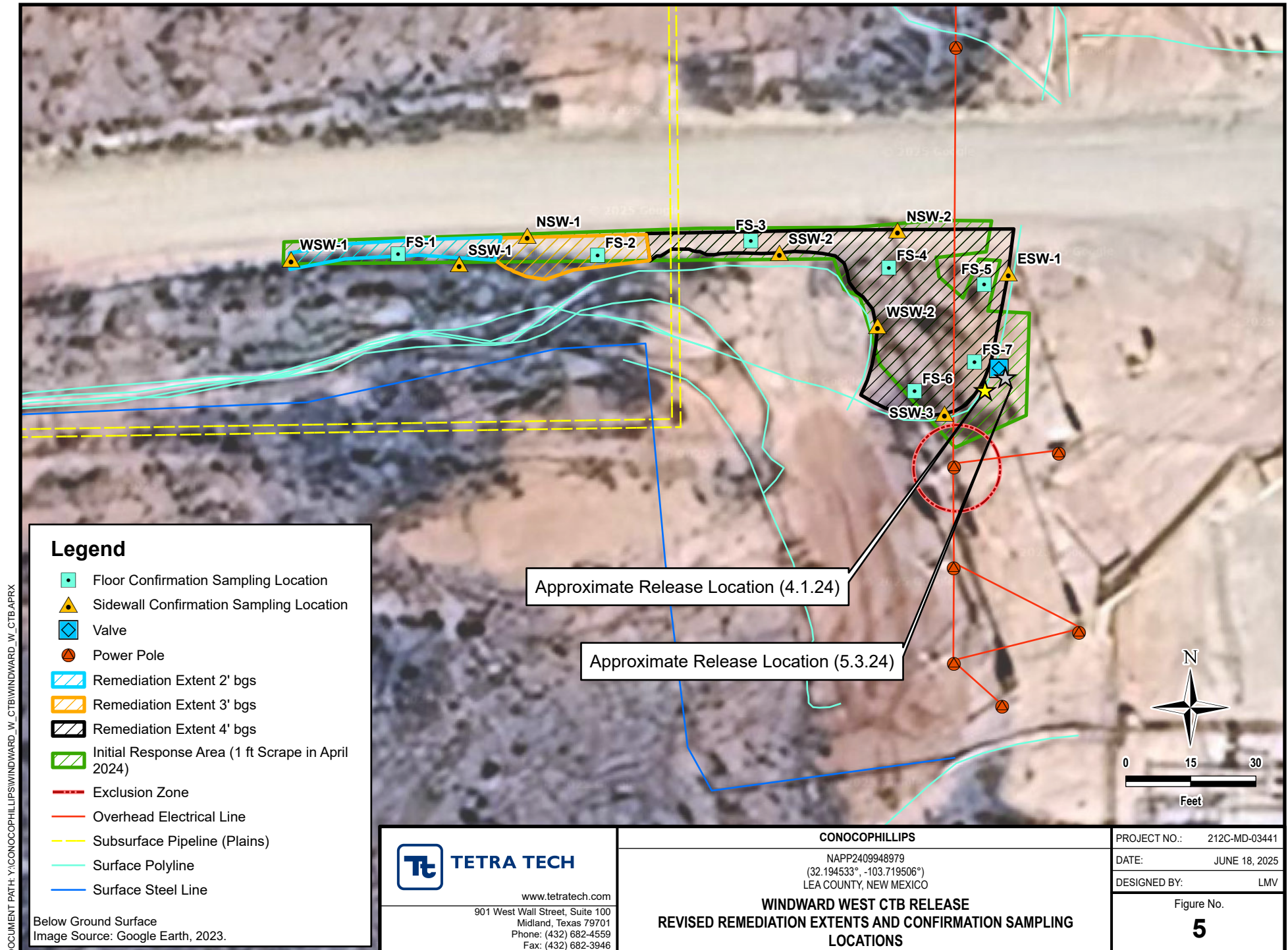
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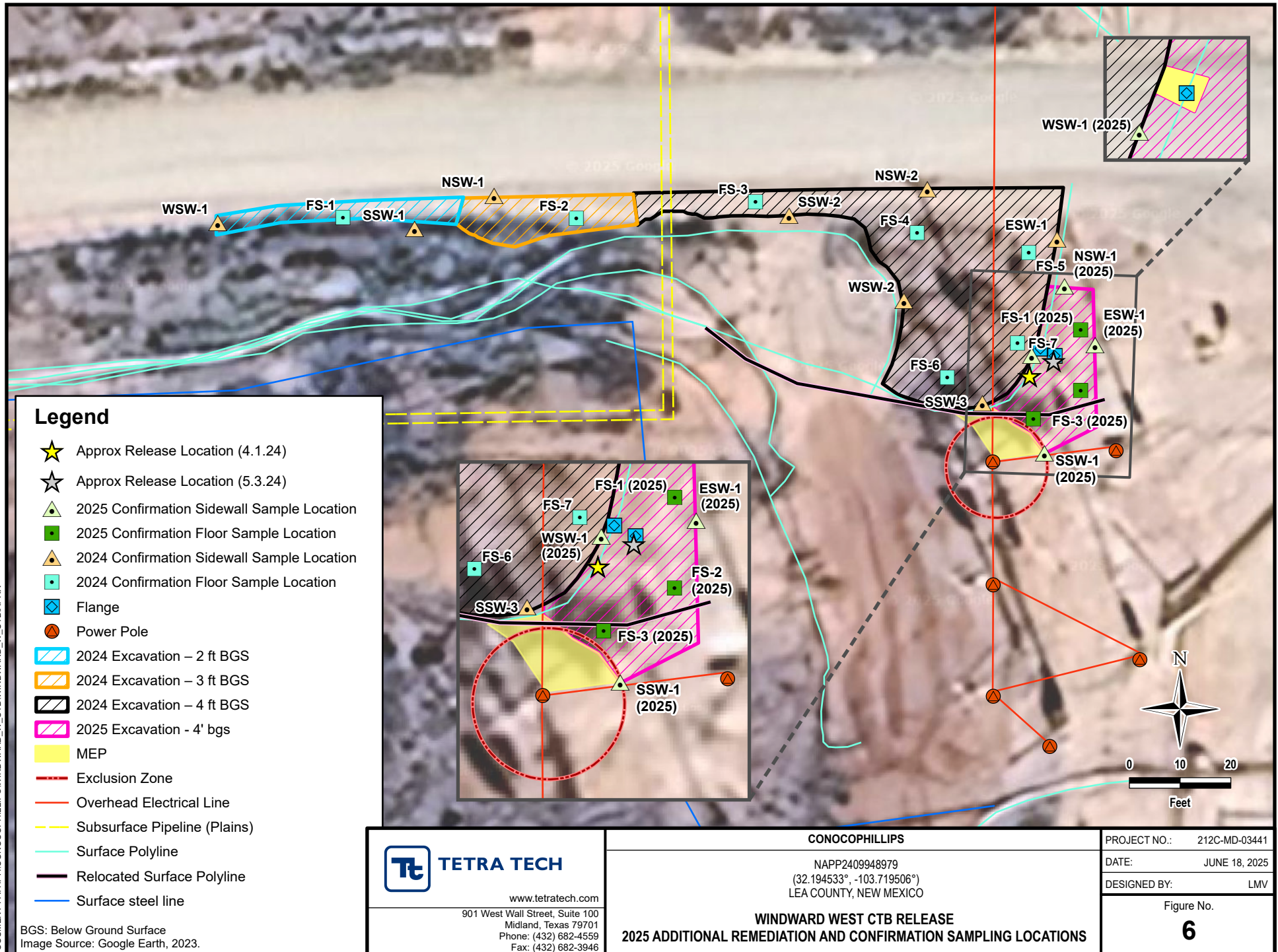








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## **TABLES**

TABLE 1  
SUMMARY OF ANALYTICAL RESULTS  
SOIL ASSESSMENT- NAPP2409948979  
CONOCOPHILLIPS  
WINDWARD WEST CTB RELEASE  
LEA COUNTY, NM

Sample ID	Sample Date	Sample Depth	Field Screening Results		Chloride		BTEX <sup>2</sup>										TPH <sup>3</sup>							
			Chloride	PID			Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO		DRO		EXT DRO		Total TPH (GRO+DRO+EXT DRO)	
		C <sub>6</sub> - C <sub>10</sub>			> C <sub>10</sub> - C <sub>28</sub>		> C <sub>28</sub> - C <sub>36</sub>																	
		ft. bgs	ppm		mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	
Reclamation Closure Criteria for Soils 0-4 ft bgs:					600 mg/kg		10 mg/kg		--		--		--		50 mg/kg		--		--		--		100 mg/kg	
Closure Criteria for Soils >4 ft bgs (GW >100 ft):					20,000 mg/kg		10 mg/kg		--		--		--		50 mg/kg		--		--		--		2,500 mg/kg	
VERTICAL DELINEATION																								
T-1	4/24/2024	0-1	7,800	-	6,800		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		2-3	2,520	-	3,760		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		3-4	8,500	-	7,360		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		5-6	6,100	-	6,480		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		7-8	10,180	-	10,700		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
T-2	4/24/2024	0-1	115	-	192		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		2-3	325	-	48		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		3-4	271	-	48		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
T-3	4/24/2024	0-1	65.2	-	112		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		2-3	92	-	160		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		3-4	380	-	128		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
HORIZONTAL DELINEATION																								
AH-1	4/24/2024	0-1	240	-	176		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
AH-2	4/24/2024	0-1	259	-	224		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
AH-3	4/24/2024	0-1	245	-	144		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		11.6		12.3		23.9	
AH-4	4/24/2024	0-1	501	-	160		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
AH-5	4/24/2024	0-1	93.3	-	80		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	

NOTES:

ft. Feet

bgs Below ground surface

mg/kg Milligrams per kilogram

TPH Total Petroleum Hydrocarbons

GRO Gasoline range organics

DRO Diesel range organics

1 Method SM4500Cl-B

2 Method 8021B

3 Method 8015M

***Bold and italicized values indicate exceedance of the applicable RRALs and/or Reclamation Requirements.***

Shaded rows indicate intervals proposed for excavation.

QUALIFIERS:

TABLE 2  
SUMMARY OF ANALYTICAL RESULTS  
SOIL ASSESSMENT- NAPP2409948979  
CONOCOPHILLIPS  
WINDWARD WEST CTB RELEASE  
LEA COUNTY, NM

Sample ID	Sample Date	Sample Depth	Field Screening Results		Chloride		BTEX <sup>2</sup>										TPH <sup>3</sup>							
			Chloride	PID			Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO		DRO		EXT DRO		Total TPH (GRO+DRO+EXT DRO)	
		C <sub>6</sub> - C <sub>10</sub>			> C <sub>10</sub> - C <sub>28</sub>	> C <sub>28</sub> - C <sub>36</sub>	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
Reclamation Closure Criteria for Soils 0-4 ft bgs:					600 mg/kg		10 mg/kg		--		--		--		50 mg/kg		--		--		--		100 mg/kg	
Closure Criteria for Soils >4 ft bgs (GW >100 ft):					20,000 mg/kg		10 mg/kg		--		--		--		50 mg/kg		--		--		--		2,500 mg/kg	
VERTICAL DELINEATION																								
BH-1	7/24/2024	0-1			5,920		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		181		46.8		227.8	
		2-3			7,730		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		10.5		<10.5		10.5	
		4-5			976		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		6-7			3,520		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		51.1		19.0		70.1	
		9-10			3,760		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		35.9		12.0		47.9	
		14-15	3,000		2,600		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		20-23	273		80.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
BH-2	7/24/2024	0-1			12,800		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		2-3			5,300		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		4-5			3,840		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		6-7			3,240		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		9-10	3,500		6,800		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		18.0		<10.0		18.0	
		13	2,200		2,000		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		18-20	300		160		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
AH-24-1	7/24/2024	0-1	10,000		9,200		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		11.9		<10.0		11.9	
BH-3	7/24/2024	0-1	3,500		7,200		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		2-3	-		848		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		43.2		<10.0		43.2	
		4-5	800		2,240		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		6-7	530		192		<0.050		<0.050		<0.050		<0.150		< 0.300		<10.0		<10.0		<10.0		-	
		9-10	430		688		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
BH-4	7/24/2024	0-1	10,000		11,800		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		1-2	-		7,360		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		43.2		<10.0		-	
		2-3	-		3,680		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		3-4	68		320		<0.050		<0.050		<0.050		<0.150		< 0.300		<10.0		<10.0		<10.0		-	
BH-5	7/24/2024	0-1	2,500		2,080		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		1-2	-		4,840		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		43.2		<10.0		-	
		2-3	-		384		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
		3-4	543		400		<0.050		<0.050		<0.050		<0.150		< 0.300		<10.0		<10.0		<10.0		-	
BH-6	7/24/2024	0-1	73		32.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	

TABLE 2  
SUMMARY OF ANALYTICAL RESULTS  
SOIL ASSESSMENT- NAPP2409948979  
CONOCOPHILLIPS  
WINDWARD WEST CTB RELEASE  
LEA COUNTY, NM

Sample ID	Sample Date	Sample Depth	Field Screening Results		Chloride		BTEX <sup>2</sup>										TPH <sup>3</sup>							
			Chloride	PID			Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO		DRO		EXT DRO		Total TPH (GRO+DRO+EXT DRO)	
																	C <sub>6</sub> - C <sub>10</sub>		> C <sub>10</sub> - C <sub>28</sub>		> C <sub>28</sub> - C <sub>36</sub>			
		ft. bgs	ppm		mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q
HORIZONTAL DELINEATION																								
H-1	7/24/2024	0-1			80.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
H-2	7/24/2024	0-1			16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
H-3	7/24/2024	0-1			96.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
H-4	7/24/2024	0-1			32.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
H-5	7/24/2024	0-1			16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	

NOTES:

- ft.      Feet
- bgs      Below ground surface
- mg/kg   Milligrams per kilogram
- TPH     Total Petroleum Hydrocarbons
- GRO     Gasoline range organics
- DRO     Diesel range organics
- 1        Method SM4500CI-B
- 2        Method 8021B
- 3        Method 8015M

***Bold and italicized values indicate exceedance of the applicable RRALs and/or Reclamation Requirements.***

Shaded rows indicate intervals proposed for excavation.

QUALIFIERS:

TABLE 3  
SUMMARY OF ANALYTICAL RESULTS  
SOIL REMEDIATION - NAPP2409948979 AND NAPP2413732369  
CONOCOPHILLIPS  
WINDERWARD WEST CTB RELEASE AND WINDWARD FEDERAL #002H FL RELEASE  
LEA COUNTY, NM

Sample ID	Sample Date	Sample Depth	Chloride <sup>1</sup>		BTEx <sup>2</sup>										TPH <sup>3</sup>							
					Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEx		Gro		Dro		Ext Dro		Total TPH (Gro+Dro+Ext Dro)	
		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		
Reclamation Closure Criteria for Soils 0-4 ft bgs:			600 mg/kg		10 mg/kg		--		--		--		50 mg/kg		--		--		--		100 mg/kg	
Site RRALs for Subsurface (>4 ft bgs) Soils (GW >100 ft):			20,000 mg/kg		10 mg/kg		--		--		--		50 mg/kg		--		--		--		2,500 mg/kg	
FS-1	10/17/2024	2	160		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
FS-2	10/17/2024	3	128		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
FS-3	10/17/2024	4	288		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
FS-4	10/17/2024	4	176		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
FS-5	10/17/2024	4	144		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
FS-6	10/17/2024	4	864		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
FS-7	10/17/2024	4	4,040		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
NSW-1	10/17/2024	-	48		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
NSW-2	10/21/2024	-	112		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
SSW-1	10/17/2024	-	32		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
SSW-2	10/21/2024	-	112		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
SSW-3	10/21/2024	-	192		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
ESW-1	10/17/2024	-	128		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
WSW-1	10/17/2024	-	96		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
WSW-2	10/21/2024	-	64		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	

NOTES:

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



TABLE 4  
SUMMARY OF ANALYTICAL RESULTS  
TWIN WELLS BUCKTHORN PIT - SOIL BACKFILL  
CONOCOPHILLIPS  
32.152167°, -103.773445°  
LEA COUNTY, NM

Sample ID	Sample Date	Chloride <sup>1</sup>		BTEX <sup>2</sup>										TPH <sup>3</sup>							
				Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO		DRO		EXT DRO		Total TPH (GRO+DRO+EXT DRO)	
		C <sub>6</sub> - C <sub>10</sub>												> C <sub>10</sub> - C <sub>28</sub>		> C <sub>28</sub> - C <sub>36</sub>					
		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	
BACKFILL - COMPOSITE	3/26/2024	16		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	

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

TABLE 5  
SUMMARY OF ANALYTICAL RESULTS  
2025 SOIL REMEDIATION - NAPP2409948979 AND NAPP2413732369  
CONOCOPHILLIPS  
WINDERWARD WEST CTB RELEASE AND WINDWARD FEDERAL #002H FL RELEASE  
LEA COUNTY, NM

Sample ID	Sample Date	Sample Depth	Chloride <sup>1</sup>		BTEx <sup>2</sup>										TPH <sup>3</sup>							
					Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEx		Gro		Dro		Ext Dro		Total TPH (Gro+Dro+Ext Dro)	
															C <sub>6</sub> - C <sub>10</sub>		> C <sub>10</sub> - C <sub>28</sub>		> C <sub>28</sub> - C <sub>36</sub>			
		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	
Reclamation Closure Criteria for Soils 0-4 ft bgs:			600 mg/kg		10 mg/kg		--		--		--		50 mg/kg		--		--		--		100 mg/kg	
Site RRALs for Subsurface (>4 ft bgs) Soils (GW >100 ft):			20,000 mg/kg		10 mg/kg		--		--		--		50 mg/kg		--		--		--		2,500 mg/kg	
FS-1	5/21/2025	4	208		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
FS-2	5/21/2025	4	3,120		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
FS-3	5/21/2025	4	1,660		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
NSW-1	5/21/2025	-	48.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
SSW-1	5/21/2025	-	256		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
ESW-1	5/21/2025	-	112		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	
WSW-1	5/21/2025	-	32.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	

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

TABLE 6  
SUMMARY OF ANALYTICAL RESULTS  
TWIN WELLS RANCH PIT - SOIL BACKFILL  
CONOCOPHILLIPS  
32.2095278°, -103.7500000°  
LEA COUNTY, NM

Sample ID	Sample Date	Chloride <sup>1</sup>		BTEX <sup>2</sup>										TPH <sup>3</sup>							
				Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO		DRO		EXT DRO		Total TPH (GRO+DRO+EXT DRO)	
														C <sub>6</sub> - C <sub>10</sub>		> C <sub>10</sub> - C <sub>28</sub>		> C <sub>28</sub> - C <sub>36</sub>			
		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	
BACKFILL - COMPOSITE	5/22/2025	32.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	

NOTES:

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

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

Form C-141  
Revised August 24, 2018  
Submit to appropriate OCD District office

Incident ID	NAPP2409948979
District RP	
Facility ID	fDHR1921042438
Application ID	

Release Notification

Responsible Party

Responsible Party	COG Operating, LLC	OGRID	229137
Contact Name	Jacob Laird	Contact Telephone	(575) 703-5482
Contact email	Jacob.Laird@ConocoPhillips.com	Incident # (assigned by OCD)	NAPP2409948979
Contact mailing address	600 West Illinois Avenue, Midland, Texas 79701		

Location of Release Source

Latitude 32.1945 Longitude -103.7196  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	Windward West CTB	Site Type	Flowline
Date Release Discovered	April 1, 2024	API# (if applicable)	

Unit Letter	Section	Township	Range	County
D	30	24S	32E	Lea

Surface Owner: ☐ State ☒ Federal ☐ Tribal ☐ Private (Name: \_\_\_\_\_)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 12.7488	Volume Recovered (bbls) 10
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

The release was caused by a hole in a water transfer line.  
This release was off pad.  
Evaluation will be made of the site to determine if we may commence remediation immediately or 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.




State of New Mexico  
Oil Conservation Division

Incident ID	NAPP2409948979
District RP	
Facility ID	fDHR1921042438
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC?  <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? N/A
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? N/A	

**Initial Response**

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

<input checked="" type="checkbox"/> The source of the release has been stopped.	
<input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment.	
<input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.	
<input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why:          	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
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: <b>Brittany N. Esparza</b>	Title: <b>Environmental Technician</b>
Signature: 	Date: <b>4/8/2024</b>
email: <b>Brittany.Esparza@ConocoPhillips.com</b>	Telephone: <b>(432) 221-0398</b>
<b><u>OCD Only</u></b>	
Received by: _____	Date: _____

Spill Calculation - Oil and Surface Pool Spill							
Received by OCD: 6/25/2025 5:08:15PM 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	58	5	1.5	290.00	6.45	0.01	6.49
Rectangle B	15	28	1.0	420.00	6.23	0.00	6.26
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	0.00
Total Surface Pool Volume Released, Release to Soil/Caliche:							12.7488

**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 331071

QUESTIONS

Operator: COG PRODUCTION, LLC 600 W. Illinois Ave Midland, TX 79701	OGRID: 217955
	Action Number: 331071
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

<b>Prerequisites</b>	
Incident ID (n#)	nAPP2409948979
Incident Name	NAPP2409948979 WINDWARD WEST CTB @ 0
Incident Type	Produced Water Release
Incident Status	Initial C-141 Received
Incident Facility	[fDHR1921042438] WINDWARD WEST CTB

<b>Location of Release Source</b>	
<i>Please answer all the questions in this group.</i>	
Site Name	Windward West CTB
Date Release Discovered	04/01/2024
Surface Owner	Federal

<b>Incident Details</b>	
<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

<b>Nature and Volume of Release</b>	
<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: Corrosion   Flow Line - Production   Produced Water   Released: 13 BBL   Recovered: 10 BBL   Lost: 3 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.

**District I**

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**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

QUESTIONS, Page 2

Action 331071

**QUESTIONS (continued)**

Operator: COG PRODUCTION, LLC 600 W. Illinois Ave Midland, TX 79701	OGRID: 217955
	Action Number: 331071
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

**QUESTIONS**

<b>Nature and Volume of Release (continued)</b>	
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: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 04/08/2024
--	---

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**Santa Fe, NM 87505**

QUESTIONS, Page 3

Action 331071

**QUESTIONS (continued)**

Operator: COG PRODUCTION, LLC 600 W. Illinois Ave Midland, TX 79701	OGRID: 217955
	Action Number: 331071
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

**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)	Not answered.
What method was used to determine the depth to ground water	Not answered.
Did this release impact groundwater or surface water	Not answered.
<b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>	
A continuously flowing watercourse or any other significant watercourse	Not answered.
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Not answered.
An occupied permanent residence, school, hospital, institution, or church	Not answered.
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Not answered.
Any other fresh water well or spring	Not answered.
Incorporated municipal boundaries or a defined municipal fresh water well field	Not answered.
A wetland	Not answered.
A subsurface mine	Not answered.
An (non-karst) unstable area	Not answered.
Categorize the risk of this well / site being in a karst geology	Not answered.
A 100-year floodplain	Not answered.
Did the release impact areas not on an exploration, development, production, or storage site	Not answered.

**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	No
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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State of New Mexico  
Energy, Minerals and Natural Resources  
Oil Conservation Division  
1220 S. St Francis Dr.  
Santa Fe, NM 87505

CONDITIONS  
  
Action 331071

CONDITIONS

Operator: COG PRODUCTION, LLC 600 W. Illinois Ave Midland, TX 79701	OGRID: 217955
	Action Number: 331071
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

CONDITIONS

Created By	Condition	Condition Date
scott.rodgers	None	4/8/2024

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 <b>not</b> on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

### **Characterization Report Checklist:** *Each of the following items must be included in the report.*

- ☐ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☐ Field data
- ☐ Data table of soil contaminant concentration data
- ☐ Depth to water determination
- ☐ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- ☐ Boring or excavation logs
- ☐ Photographs including date and GIS information
- ☐ Topographic/Aerial maps
- ☐ Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.



State of New Mexico  
Oil Conservation Division

Page 4

Incident ID	
District RP	
Facility ID	
Application ID	

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

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

Signature:  \_\_\_\_\_ Date: \_\_\_\_\_

email: \_\_\_\_\_ Telephone: \_\_\_\_\_

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Incident ID	
District RP	
Facility ID	
Application ID	

## Remediation Plan


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

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

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

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

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

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_  
Signature: \_\_\_\_\_  Date: \_\_\_\_\_  
email: \_\_\_\_\_ Telephone: \_\_\_\_\_

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

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

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Incident ID	
District RP	
Facility ID	
Application ID	

## Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

**Closure Report Attachment Checklist:** *Each of the following items must be included in the closure report.*

- ☐ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☐ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☐ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☐ Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

Signature:  \_\_\_\_\_ Date: \_\_\_\_\_

email: \_\_\_\_\_ Telephone: \_\_\_\_\_

### OCD Only

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

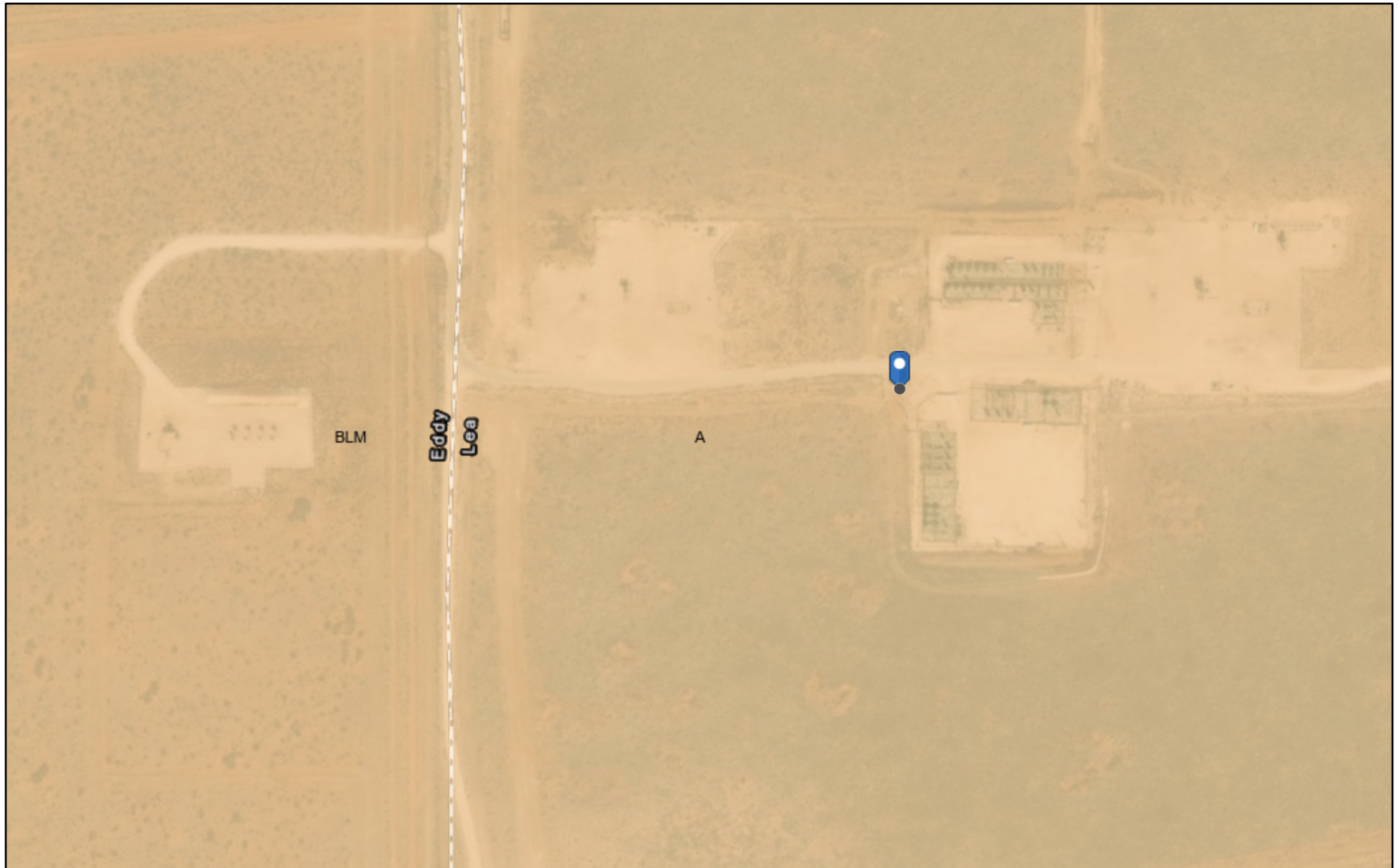
Closure Approved by: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

## **APPENDIX B**

### **Site Characterization Data**


# OCD Land ownership




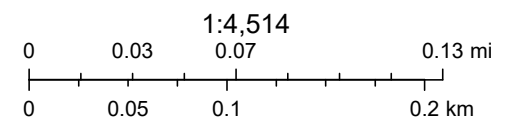
7/16/2024, 9:58:44 AM

Mineral Ownership

Land Ownership

 A-All minerals are owned by U.S.

 BLM



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



# 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
<a href="#">C 04665</a>	CUB	LE		1	1	2	30	24S	32E	621350	3562798	663	120		
<a href="#">C 04654 POD1</a>	CUB	ED		3	3	4	25	24S	31E	619764	3561226	1753	55		
<a href="#">C 04636 POD1</a>	CUB	ED		3	4	3	25	24S	31E	619200	3561279	2070			
<a href="#">C 04643 POD1</a>	C	ED		4	2	2	05	23S	27E	619200	3561279	2070	305	135	170

Average Depth to Water: **135 feet**

Minimum Depth: **135 feet**

Maximum Depth: **135 feet**

Record Count: 4

UTMNAD83 Radius Search (in meters):

**Easting (X):** 620691.62

**Northing (Y):** 3562714.68

**Radius:** 3000

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.

7/16/24 9:12 AM

Page 1 of 1

WATER COLUMN/ AVERAGE  
DEPTH TO WATER



# National Flood Hazard Layer FIRMette



103°43'29"W 32°11'55"N



## 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
		Profile Baseline
MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped



The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

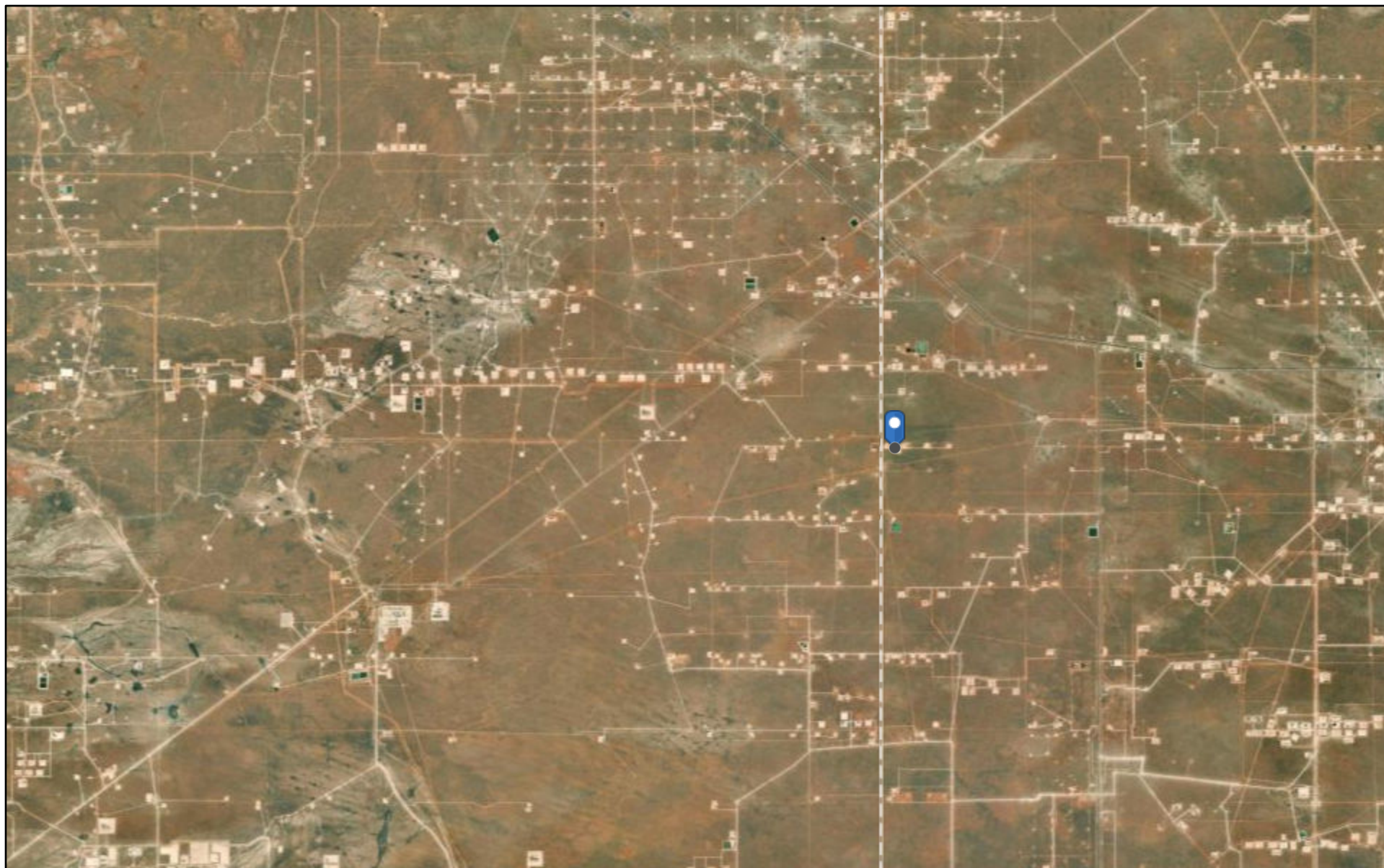
This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 7/16/2024 at 11:02 AM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

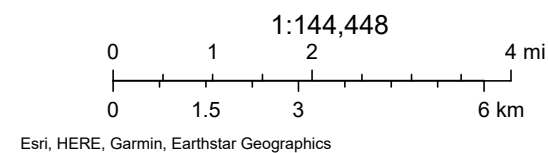
This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory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



# OCD Water Bodys



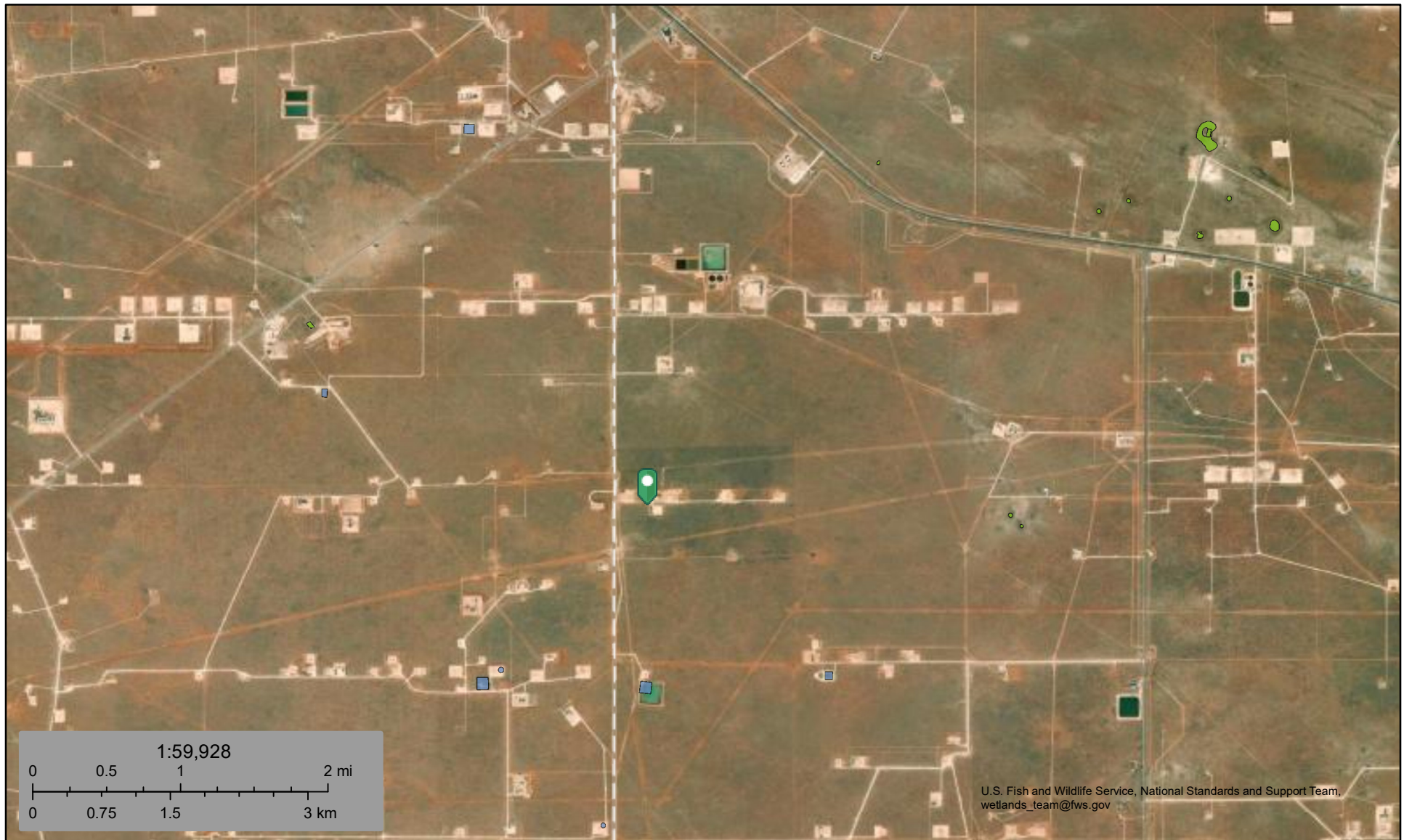
7/16/2024, 10:00:32 AM












## National Wetlands Inventory



July 16, 2024

**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.

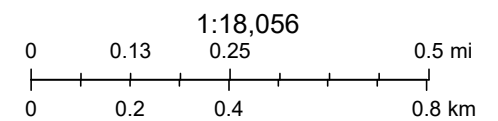
## OCD Karst Areas



7/16/2024, 10:03:30 AM

Karst Occurrence Potential

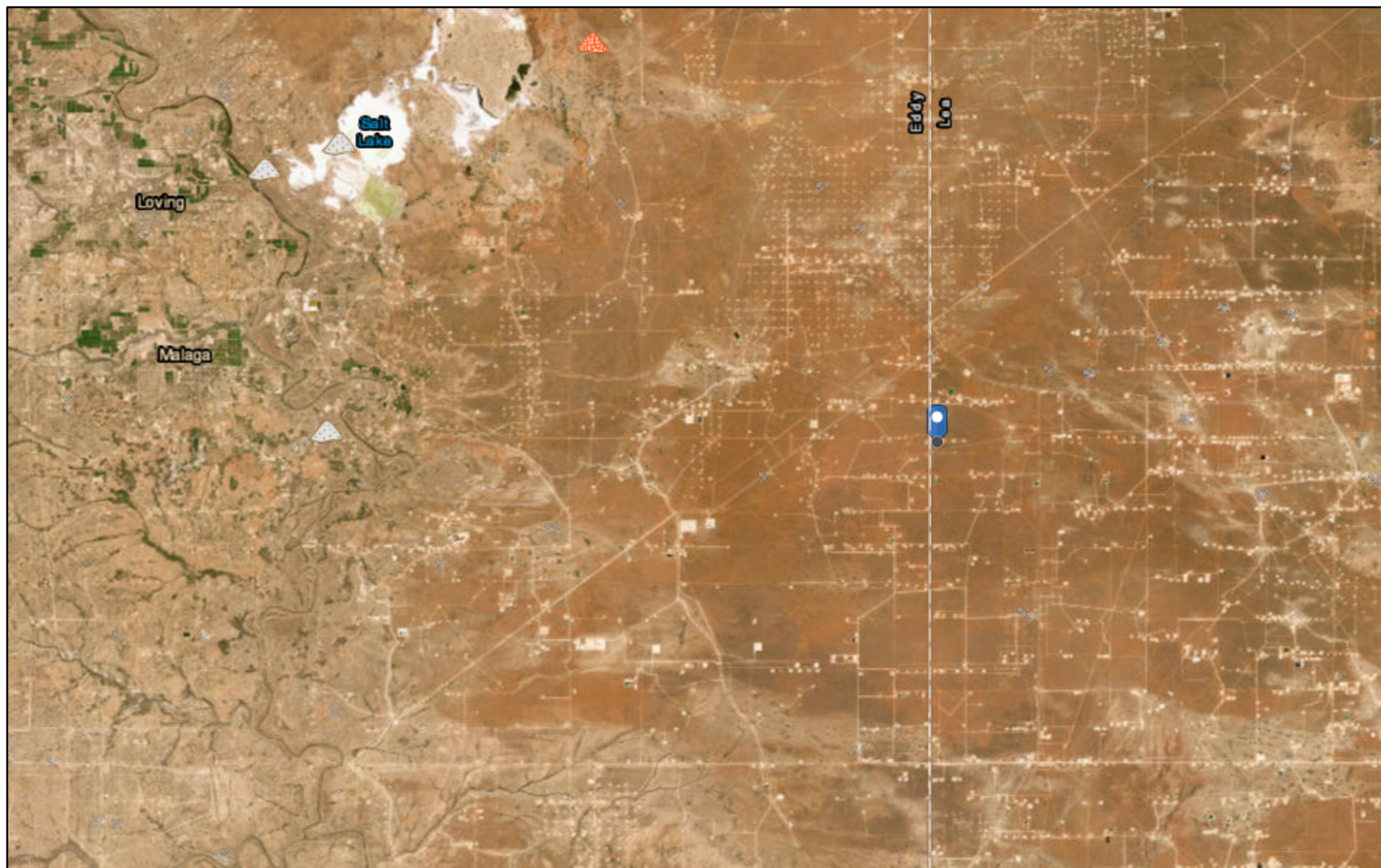
Low



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



## EMNRD Active Mines



7/16/2024, 10:51:13 AM

Registered Mines

Aggregate, Stone etc.



Aggregate, Stone etc.



Aggregate, Stone etc.

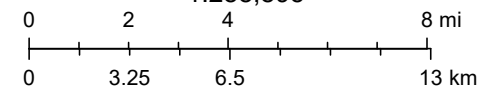


Potash



Salt

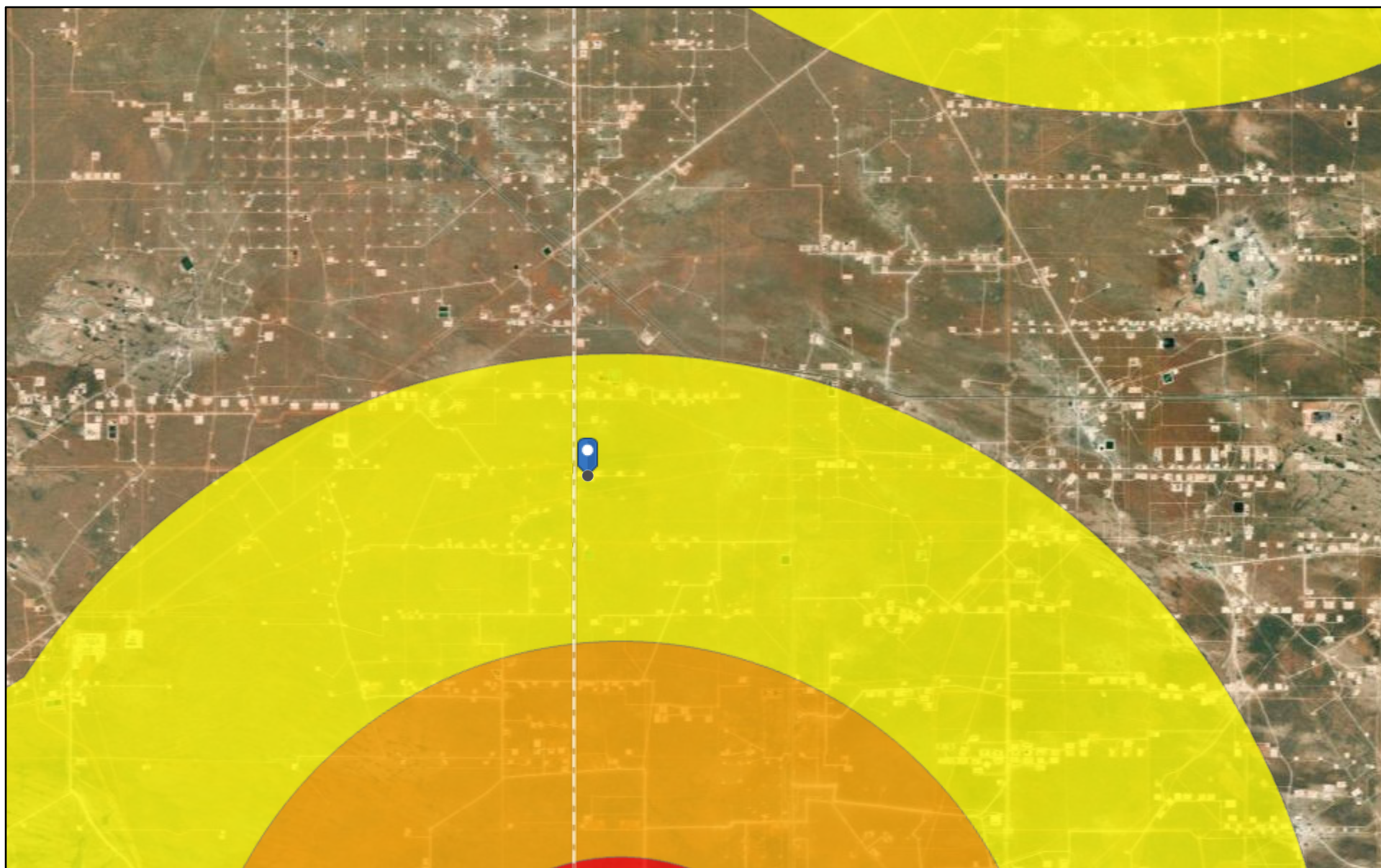
1:288,895



Esri, HERE, Garmin, Earthstar Geographics



## OCD Induced Seismicity Area



7/16/2024, 10:08:42 AM

Seismic Response 3.0 to 3.4



3 mi.

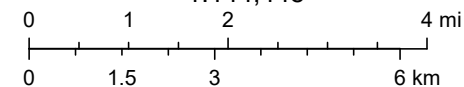


6 mi.



10 mi.

1:144,448



Oil Conservation Division (OCD), Energy, Minerals and Natural Resources Department (EMNRD), Esri, HERE, Garmin, Earthstar Geographics

New Mexico Oil Conservation Division

## **APPENDIX C**

### **Regulatory Correspondence**



**From:** [OCDOnline@state.nm.us](mailto:OCDOnline@state.nm.us)  
**To:** [Lull, Christian](#)  
**Subject:** The Oil Conservation Division (OCD) has approved the application, Application ID: 383253  
**Date:** Tuesday, September 17, 2024 5:01:30 PM

**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 PRODUCTION, LLC),

The OCD has approved the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nAPP2409948979, with the following conditions:

- **Remediation plan approved with conditions. Confirmation samples are to be collected every 200 square feet from the base and walls of the excavation. Submit remediation closure report to the OCD by 12/16/2024.**

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

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

Thank you,  
Shelly Wells  
Environmental Specialist-A  
505-469-7520  
[Shelly.Wells@emnrd.nm.gov](mailto:Shelly.Wells@emnrd.nm.gov)

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

**From:** [Lull, Christian](#)  
**To:** [Abbott, Sam](#)  
**Subject:** FW: [EXTERNAL] Fwd: (Work Plans) Windward CTB (NAPP2409948979, 4-1-2024 and NAPP2413732369, 5/3/2024)  
**Date:** Friday, October 11, 2024 9:34:47 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[Outlook-2sqcd5sr.png](#)  
[Outlook-zialmfa.png](#)



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BLM approval for the Windward CTB remediation

Christian

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**From:** Morgan, Crisha A <camorgan@blm.gov>  
**Sent:** Friday, October 11, 2024 9:30 AM  
**To:** Lull, Christian <Christian.Lull@tetrattech.com>  
**Subject:** Re: [EXTERNAL] Fwd: (Work Plans) Windward CTB (NAPP2409948979, 4-1-2024 and NAPP2413732369, 5/3/2024)

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



The remediation report for both Windward CTB releases has been approved from the BLM as of 10/11/2024. More extensive work may be required during future major well pad construction/alteration or final plugging and abandonment.

The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. In such an event that the location does not re-vegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until the contaminant issues are fully mitigated and the location is successfully reclaimed. In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state, or local laws/regulations.

If you have any questions or concerns, please let me know. Have a great day!

**Crisha A. Morgan** | Certified - Environmental Protection Specialist | Program Officer|COR| Spills Coordinator| Orphaned & Idled Well POC Lead  
Bureau of Land Management | Carlsbad Field Office  
620 E. Greene Street Carlsbad, NM 88220  
Cell 575-200-8648 | Office 575-234-5987 | [camorgan@blm.gov](mailto:camorgan@blm.gov)



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---

**From:** Lull, Christian <[Christian.Lull@tetrattech.com](mailto:Christian.Lull@tetrattech.com)>

**Sent:** Thursday, October 10, 2024 1:00 PM  
**To:** Morgan, Crisha A <[camorgan@blm.gov](mailto:camorgan@blm.gov)>  
**Subject:** [EXTERNAL] Fwd: (Work Plans) Windward CTB (NAPP2409948979, 4-1-2024 and NAPP2413732369, 5/3/2024)

**This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.**

Bumping

Christian

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**From:** Abbott, Sam <[Sam.Abbott@tetrattech.com](mailto:Sam.Abbott@tetrattech.com)>  
**Sent:** Wednesday, September 25, 2024 5:47:10 PM  
**To:** [camorgan@blm.gov](mailto:camorgan@blm.gov) <[camorgan@blm.gov](mailto:camorgan@blm.gov)>  
**Cc:** Llull, Christian <[Christian.Llull@tetrattech.com](mailto:Christian.Llull@tetrattech.com)>  
**Subject:** RE: (Work Plans) Windward CTB (NAPP2409948979, 4-1-2024 and NAPP2413732369, 5/3/2024)

Crisha,

Attached is the Remediation Work Plan for the second incident. The files were too large for a single email.

Thank you,  
Sam

**Samantha Abbott, PG** | Project Manager  
Direct Mobile +1 (512) 739-7874 | Business +1 (512) 338-1667 | [Sam.Abbott@tetrattech.com](mailto:Sam.Abbott@tetrattech.com)

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---

**From:** Abbott, Sam  
**Sent:** Wednesday, September 25, 2024 5:45 PM  
**To:** [camorgan@blm.gov](mailto:camorgan@blm.gov)  
**Cc:** Llull, Christian <[Christian.Llull@tetrattech.com](mailto:Christian.Llull@tetrattech.com)>  
**Subject:** (Work Plans) Windward CTB (NAPP2409948979, 4-1-2024 and NAPP2413732369, 5/3/2024)

Crisha:

Attached for your review are the Remediation Work Plans for the Windward CTB Combined Release Site. Two coincident release footprints are addressed with a single proposed remediation action, in separate work plans (one per incident).

- Theses WPs have been approved by NMOCD.

Please provide an Environmental Impact Review for the remedial action proposed in the Remediation Work Plans.

#### Windward CTB

##### Multiple Coincident Release Footprints

**Windward West CTB Release (1)**

**Windward Federal #002H FL Release (2)**

**ConocoPhillips (Heritage COG Operating, LLC)**

**Lea County, New Mexico**

**DOR: 4/1/2024 (1)**

**DOR: 5/3/2024 (2)**

**INCIDENT ID: NAPP2409948979 (1)**

**INCIDENT ID: NAPP2413732369 (2)**

**Approximate Release Point: 32.194533°, -103.719506°**

**Approximate Release Point: 32.1945°, -103.7195°**

**Landowner: BLM**

#### PROJECT BACKGROUND

##### • Windward West CTB Release (NAPP2409948979)

- The release was caused by a SWD transfer line rupture on April 1, 2024.
- Approximately 13 bbls of produced water were release, of which 10 bbls of produced water were recovered.
- The NMOCD approved the initial C-141 and subsequently assigned the release the Incident ID **NAPP2409948979**.
- The spill calculator included with the C-141 indicates a surface area impact of approximately 800 square feet. The in-field measurements indicate a slightly larger extent.
- Tetra Tech was onsite when the release occurred at a nearby RMR remediation job.
  - While onsite, Tetra Tech personnel conducted a site visit and collected photographs to discern the release footprint.
  - Tetra Tech personnel observed the fresh release extent, pooled liquid was observed at the surface, stressed vegetation and the release running to the west adjacent to the road.
  - The release point was confirmed.
  - Surface steel lines, surface polylines, and subsurface lines were observed running through and around the release area.
- Tetra Tech conducted initial assessment sampling activities for the Windward West CTB Release on April 24, 2024.
  - A total of three soil test trenches (T-1 through T-3) were installed to depths ranging from 4 to 8 feet below surface to assess the vertical extent of the release.
  - A total of five hand auger borings were installed along the perimeter of the release to assess the horizontal extent.
  - Horizontal delineation was achieved as a result of the initial assessment activities, but vertical delineation was not achieved at a depth of 8 feet below surface.

##### • Windward Federal #002H Release (NAPP2413732369)

- The second release was discovered on May 3, 2024.
- The release was caused by a hold in a water transfer line, resulting in the release of approximately 4.1217 bbls of produced water.
- The release occurred off-pad and on top of the existing Windward West CTB Release extent.
- The NMOCD approved the initial C-141 and subsequently assigned the release the Incident ID **NAPP2413732369**.
- The spill calculator included with the C-141 indicates a surface area impact of approximately 650 square feet.
- Tetra Tech conducted additional assessment sampling in July 2024 and successfully delineated the combined release extent.
- A Remediation Work Plan for each incident dated September 12, 2024 was prepared by Tetra Tech on behalf of COPC, and submitted to the NMOCD.
- The NMOCD approved the Remediation Work Plans in emails dated September 17, 2024, with the following comments;
  - *"Remediation plan approved with conditions. Confirmation samples are to be collected at a frequency of every 200 square feet from the base and walls of the excavation. Submit remediation closure report to the OCD by 12/16/2024."*
- Tetra Tech proposes to excavate to a maximum depth of 4 ft BGS in the approximate release extent presented in

Figure 5.

- Following excavation activities confirmed with analytical sampling, the backfilled areas will be backfilled with clean material and seeded with BLM Seed Mix #2.

Let me know what you think,  
Sam

**Samantha Abbott, PG** | Project Manager

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

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**From:** [OCDOnline@state.nm.us](mailto:OCDOnline@state.nm.us)  
**To:** [Lull, Christian](#)  
**Subject:** The Oil Conservation Division (OCD) has accepted the application, Application ID: 391824  
**Date:** Friday, October 11, 2024 8:35:09 AM

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

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

The OCD has received the submitted *Notification for (Final) Sampling of a Release* (C-141N), for incident ID (n#) nAPP2409948979.

The sampling event is expected to take place:

**When:** 10/16/2024 @ 10:00

**Where:** D-30-24S-32E 0 FNL 0 FEL (32.1945001,-103.7196001)

**Additional Information:** Confirmation sampling expected to take place 10/16 and 10/17. Please contact Samantha Abbott at (512) 739-7874

**Additional Instructions:** GPS: 32.194533°, -103.719506°

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

**From:** [OCDOnline@state.nm.us](mailto:OCDOnline@state.nm.us)  
**To:** [Lull, Christian](#)  
**Subject:** The Oil Conservation Division (OCD) has accepted the application, Application ID: 393614  
**Date:** Thursday, October 17, 2024 5:13:20 PM

**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 PRODUCTION, LLC),

The OCD has received the submitted *Notification for (Final) Sampling of a Release* (C-141N), for incident ID (n#) nAPP2409948979.

The sampling event is expected to take place:

**When:** 10/21/2024 @ 10:00

**Where:** D-30-24S-32E 0 FNL 0 FEL (32.1945001,-103.7196001)

**Additional Information:** Confirmation sampling expected to continue. Please contact Samantha Abbott at (512) 739-7874

**Additional Instructions:** GPS: 32.194533°, -103.719506°

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

**Chavira, Lisbeth**

---

**From:** OCDOnline@state.nm.us  
**Sent:** Tuesday, December 10, 2024 5:09 PM  
**To:** Llull, Christian  
**Subject:** The Oil Conservation Division (OCD) has rejected the application, Application ID: 408459

**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 PRODUCTION, LLC),

The OCD has rejected the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nAPP2413732369, for the following reasons:

- **Remediation closure and reclamation denied for the following:**
- **1)To the question "What is the estimated surface area (in square feet) that will be remediated" you answered 2383 which means at least 12 floor samples should have been collected from the excavation. In remediation plan approval on 9/17/24, you had requested to sample every 400 square feet and had proposed to collect 16 total confirmation samples. The conditions of approval stated you were to sample every 200 square feet which should have resulted in more samples being collected than the requested 16.**
- **2)In approved remediation plan, The Proposed Remediation Map, Figure 5 showed the excavation extending south past the point of release but Figure 4 in submitted closure report shows the excavation did not extend through this area. Confirmation samples will need to be collected around points of release to ensure all contaminants are removed and entire release area meets reclamation standards.**
- **Resubmit remediation closure report to the OCD by 3/5/25.**

The rejected C-141 can be found in the OCD Online: Permitting - Action Status, under the Application ID: 408459.

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

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

Thank you,  
Shelly Wells  
Environmental Specialist-A  
505-469-7520  
Shelly.Wells@emnrd.nm.gov

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

**Chavira, Lisbeth**

---

**From:** Wells, Shelly, EMNRD <Shelly.Wells@emnrd.nm.gov>  
**Sent:** Tuesday, March 4, 2025 3:33 PM  
**To:** Abbott, Sam  
**Cc:** Llull, Christian; Bratcher, Michael, EMNRD  
**Subject:** RE: [EXTERNAL] Extension Request - COP Windward CTB (NAPP2409948979 and NAPP2413732369)

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

Good afternoon Sam,

The extension requests for NAPP2409948979 and NAPP2413732369 is approved. The new due date to submit your updated remediation plan or closure report to the OCD is June 2, 2025. 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.

Kind regards,

Shelly

Shelly Wells \* Environmental Specialist-Advanced  
Environmental Bureau  
EMNRD-Oil Conservation Division  
1220 S. St. Francis Drive|Santa Fe, NM 87505  
(505)469-7520 [Shelly.Wells@emnrd.nm.gov](mailto:Shelly.Wells@emnrd.nm.gov)  
<http://www.emnrd.state.nm.us/OCD/>

**From:** Abbott, Sam <Sam.Abbott@tetrattech.com>  
**Sent:** Tuesday, March 4, 2025 1:46 PM  
**To:** Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>  
**Cc:** Wells, Shelly, EMNRD <Shelly.Wells@emnrd.nm.gov>; Llull, Christian <Christian.Llull@tetrattech.com>  
**Subject:** [EXTERNAL] Extension Request - COP Windward CTB (NAPP2409948979 and NAPP2413732369)

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Good afternoon,

Tetra Tech, on behalf of ConocoPhillips, would like to request an extension to complete the additional sampling activities and report revisions to address NMOCD comments to the previously submitted closure reports for the overlapping Windward CTB incidents (NAPP2409948979 and NAPP2413732369). The reason for the extension request is due to a scheduling delay following the holidays and other project commitments, but which is now resolved. We currently have the additional sampling activities scheduled for next week. A C-141N will be submitted for this sampling event.

I appreciate your attention to this matter.

Thank you,  
Sam

**Samantha Abbott, PG** | Project Manager  
Direct Mobile +1 (512) 739-7874 | Business +1 (512) 338-1667 | [Sam.Abbott@tetrattech.com](mailto:Sam.Abbott@tetrattech.com)

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**TETRA TECH**



**Chavira, Lisbeth**

---

**From:** OCDOnline@state.nm.us  
**Sent:** Thursday, May 15, 2025 1:52 PM  
**To:** Llull, Christian  
**Subject:** The Oil Conservation Division (OCD) has accepted the application, Application ID: 463773

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

The OCD has received the submitted *Notification for (Final) Sampling of a Release (C-141N)*, for incident ID (n#) nAPP2409948979.

The sampling event is expected to take place:

**When:** 05/20/2025 @ 10:00

**Where:** D-30-24S-32E 0 FNL 0 FEL (32.1945001,-103.7196001)

**Additional Information:** Colton Bickerstaff | Geologist | Senior Site Supervisor

Phone: 432.250.9943 | Fax: 432.682.3946

Colton.Bickerstaff@tetrattech.com

**Additional Instructions:** Multiple Coincident Release Footprints

Windward West CTB Release (1)

Windward Federal #002H FL Release (2)

ConocoPhillips (Heritage COG Operating, LLC)

Lea County, New Mexico

DOR: 4/1/2024 (1)

DOR: 5/3/2024 (2)

INCIDENT ID: NAPP2409948979 (1)

INCIDENT ID: NAPP2413732369 (2)

Approximate Release Point: 32.194533°, -103.719506°

Approximate Release Point: 32.1945°, -103.7195°

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

**Chavira, Lisbeth**

---

**From:** OCDOnline@state.nm.us  
**Sent:** Thursday, May 15, 2025 1:55 PM  
**To:** Llull, Christian  
**Subject:** The Oil Conservation Division (OCD) has accepted the application, Application ID: 463779

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

The OCD has received the submitted *Notification for (Final) Sampling of a Release (C-141N)*, for incident ID (n#) nAPP2409948979.

The sampling event is expected to take place:

**When:** 05/21/2025 @ 10:00

**Where:** D-30-24S-32E 0 FNL 0 FEL (32.1945001,-103.7196001)

**Additional Information:** Colton Bickerstaff | Geologist | Senior Site Supervisor

Phone: 432.250.9943 | Fax: 432.682.3946

Colton.Bickerstaff@tetrattech.com

**Additional Instructions:** Multiple Coincident Release Footprints

Windward West CTB Release (1)

Windward Federal #002H FL Release (2)

ConocoPhillips (Heritage COG Operating, LLC)

Lea County, New Mexico

DOR: 4/1/2024 (1)

DOR: 5/3/2024 (2)

INCIDENT ID: NAPP2409948979 (1)

INCIDENT ID: NAPP2413732369 (2)

Approximate Release Point: 32.194533°, -103.719506°

Approximate Release Point: 32.1945°, -103.7195°

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

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

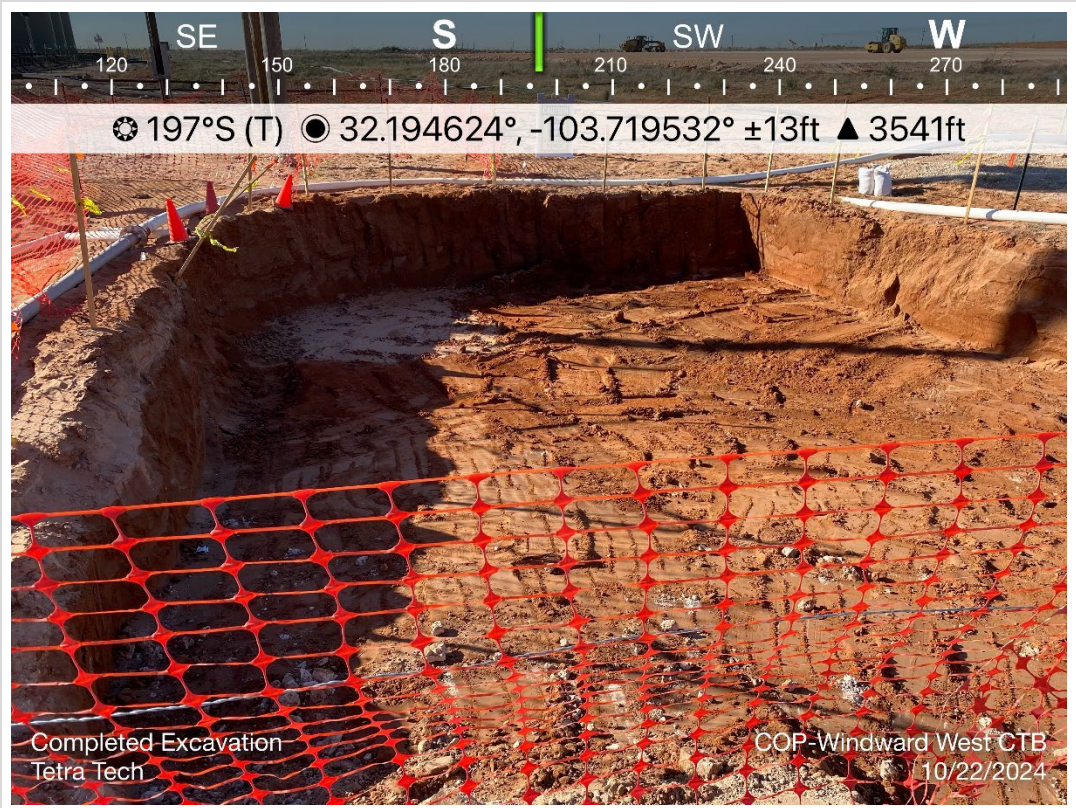
If you have any questions regarding this application, or don't know why you have received this email, please contact us.

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

## **APPENDIX D**

# **Photographic Documentation**



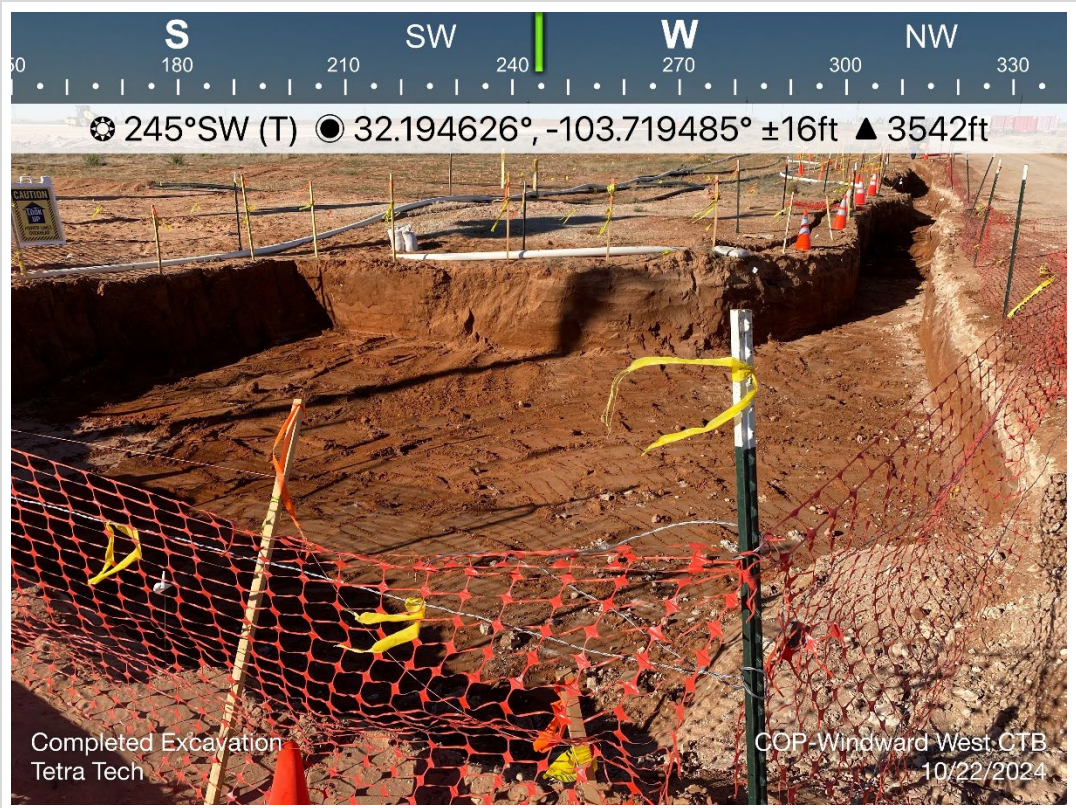


TETRA TECH, INC. PROJECT NO. 212C-MD-03441A	DESCRIPTION	2024. View south-southwest of completed excavation.	1
	SITE NAME	Windward West CTB Release (NAPP2409948979) Windward Federal #002H FL Release (NAPP2413732369)	10/22/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03441A	DESCRIPTION	2024. View southwest of completed excavation.	2
	SITE NAME	Windward West CTB Release (NAPP2409948979) Windward Federal #002H FL Release (NAPP2413732369)	10/23/2024



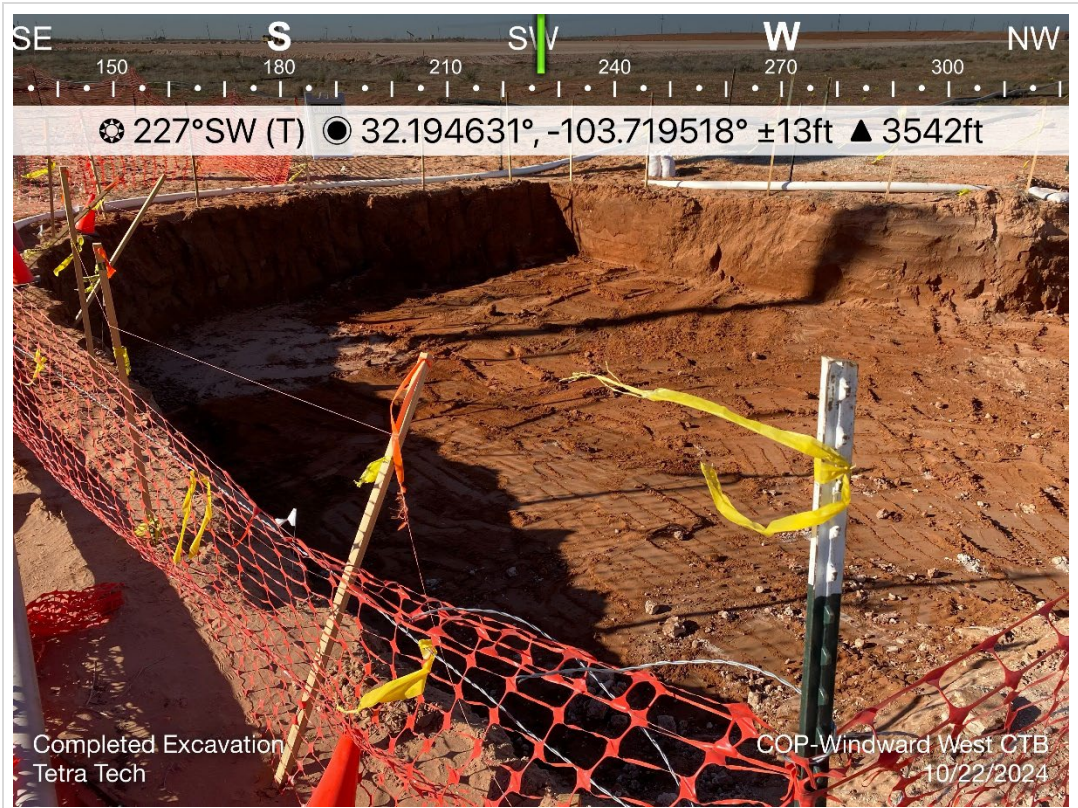


TETRA TECH, INC. PROJECT NO. 212C-MD-03441A	DESCRIPTION	2024. View west-southwest of completed excavation.	3
	SITE NAME	Windward West CTB Release (NAPP2409948979) Windward Federal #002H FL Release (NAPP2413732369)	10/22/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03441A	DESCRIPTION	2024. View west of completed excavation.	4
	SITE NAME	Windward West CTB Release (NAPP2409948979) Windward Federal #002H FL Release (NAPP2413732369)	10/23/2024



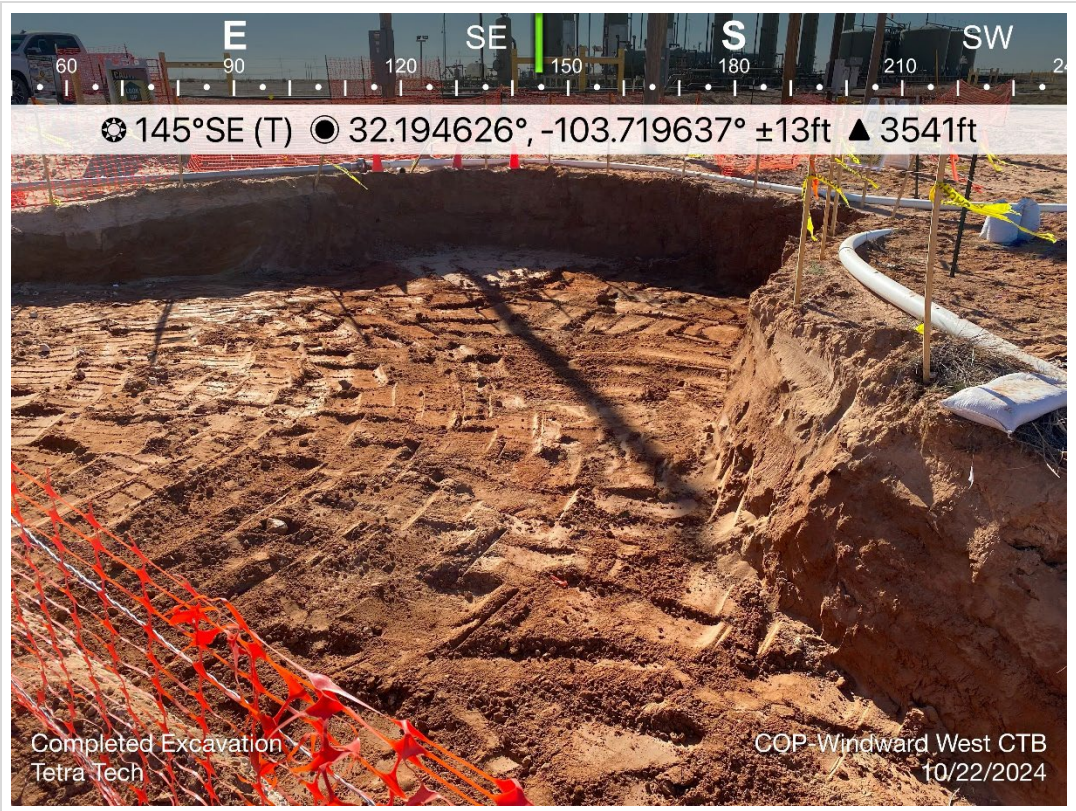


TETRA TECH, INC. PROJECT NO. 212C-MD-03441A	DESCRIPTION	2024. View southwest of completed excavation.	5
	SITE NAME	Windward West CTB Release (NAPP2409948979) Windward Federal #002H FL Release (NAPP2413732369)	10/22/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03441A	DESCRIPTION	2024. View southwest of backfilled excavation.	6
	SITE NAME	Windward West CTB Release (NAPP2409948979) Windward Federal #002H FL Release (NAPP2413732369)	10/22/2024



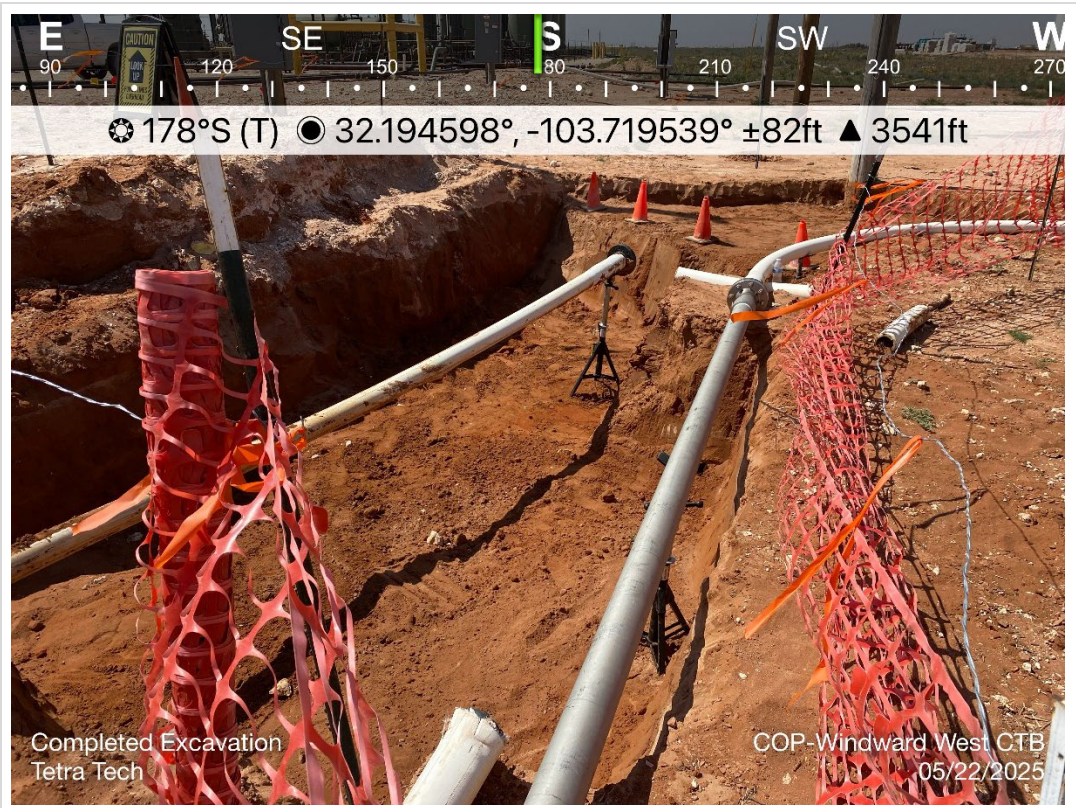


TETRA TECH, INC. PROJECT NO. 212C-MD-03441A	DESCRIPTION	2024. View southeast of completed excavation.	7
	SITE NAME	Windward West CTB Release (NAPP2409948979) Windward Federal #002H FL Release (NAPP2413732369)	10/22/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03441A	DESCRIPTION	2024. View southeast of backfilled excavation.	8
	SITE NAME	Windward West CTB Release (NAPP2409948979) Windward Federal #002H FL Release (NAPP2413732369)	10/23/2024



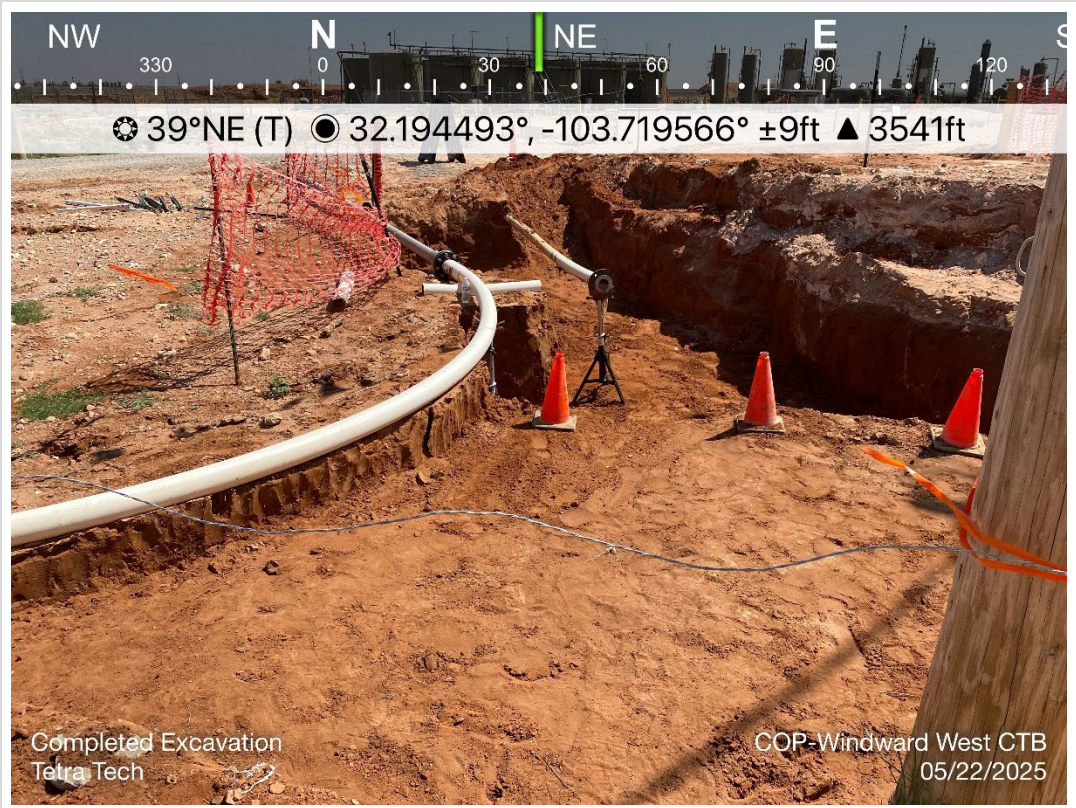


TETRA TECH, INC. PROJECT NO. 212C-MD-03441A	DESCRIPTION	2025. View south of additional excavation area. Steel line visible, abandoned line visible.	9
	SITE NAME	Windward West CTB Release (NAPP2409948979) Windward Federal #002H FL Release (NAPP2413732369)	05/22/2025



TETRA TECH, INC. PROJECT NO. 212C-MD-03441A	DESCRIPTION	View north. View of the MEP area at pole and 4 ft excavation. View of surface line and abandoned line.	10
	SITE NAME	Windward West CTB Release (NAPP2409948979) Windward Federal #002H FL Release (NAPP2413732369)	05/22/2025



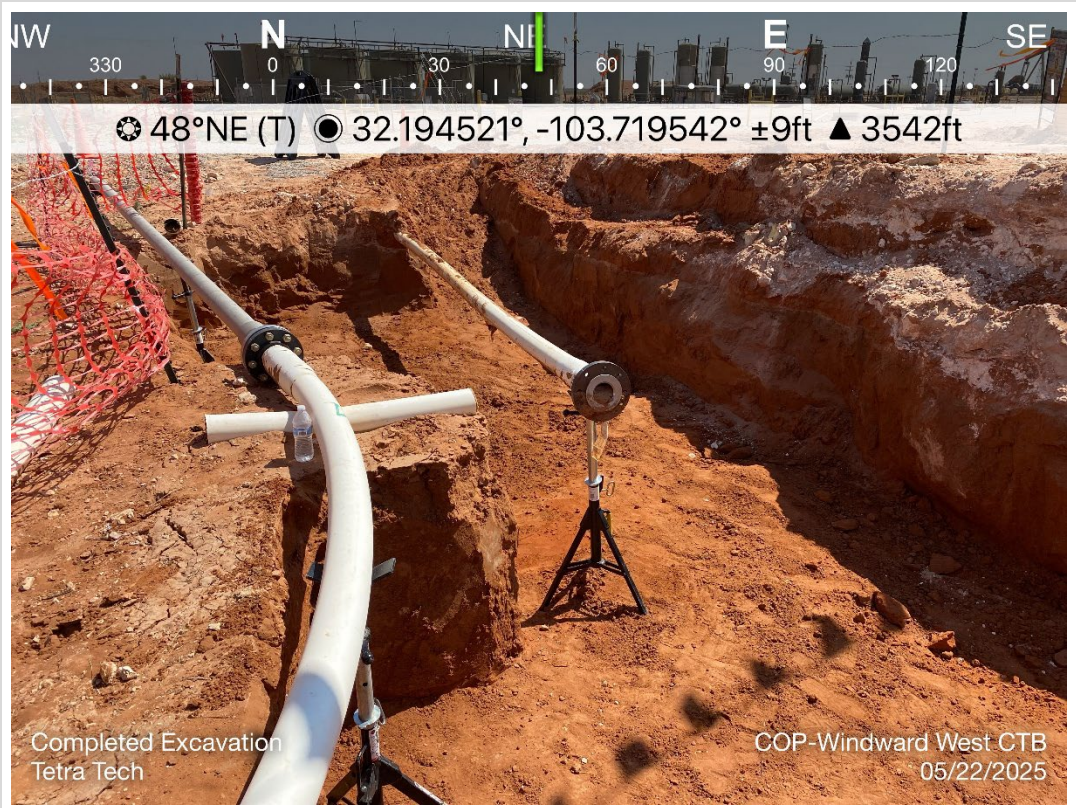


TETRA TECH, INC. PROJECT NO. 212C-MD-03441A	DESCRIPTION	View northeast. View of the MEP area at pole and 4 ft excavation. View of surface line and abandoned line.	11
	SITE NAME	Windward West CTB Release (NAPP2409948979) Windward Federal #002H FL Release (NAPP2413732369)	05/22/2025



TETRA TECH, INC. PROJECT NO. 212C-MD-03441A	DESCRIPTION	View northwest. View of the exclusion zone at pole, 4 ft excavation. View of surface line and abandoned line.	12
	SITE NAME	Windward West CTB Release (NAPP2409948979) Windward Federal #002H FL Release (NAPP2413732369)	05/22/2025





TETRA TECH, INC. PROJECT NO. 212C-MD-03441A	DESCRIPTION	View northeast. View of the 4ft excavation. View of surface polyline and abandoned line.	13
	SITE NAME	Windward West CTB Release (NAPP2409948979) Windward Federal #002H FL Release (NAPP2413732369)	05/22/2025

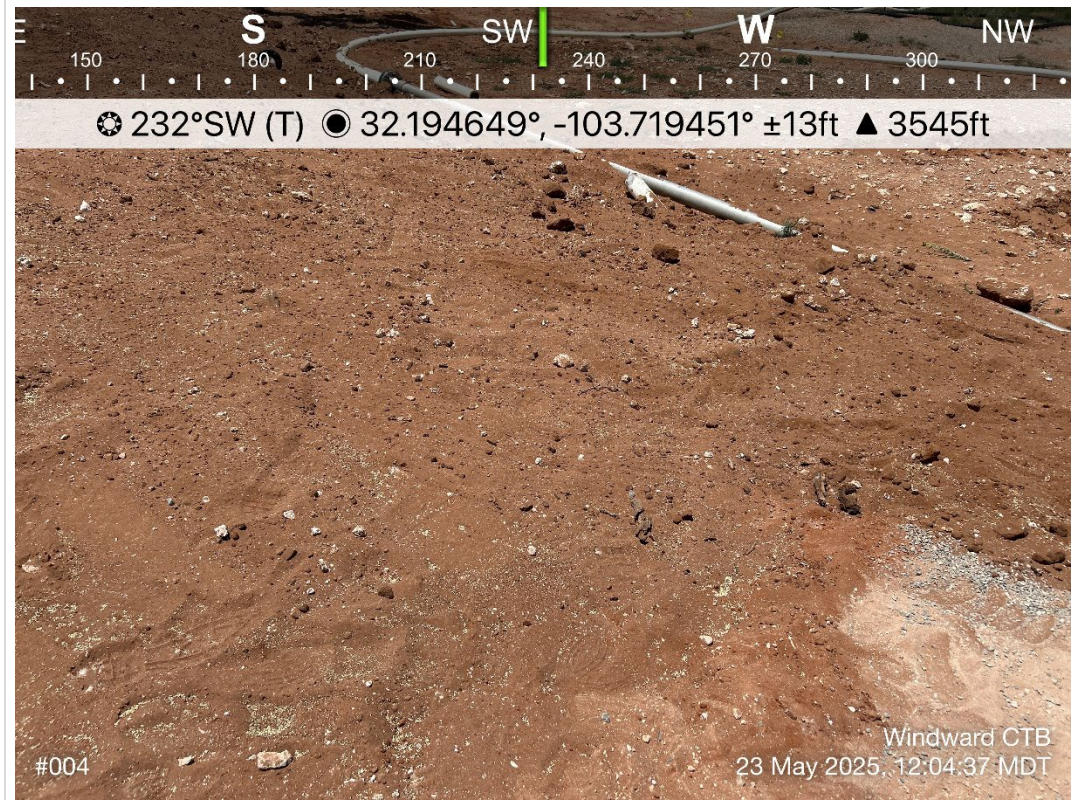


TETRA TECH, INC. PROJECT NO. 212C-MD-03441A	DESCRIPTION	View south. View of backfilled and seeded excavation area.	14
	SITE NAME	Windward West CTB Release (NAPP2409948979) Windward Federal #002H FL Release (NAPP2413732369)	05/23/2025





TETRA TECH, INC. PROJECT NO. 212C-MD-03441A	DESCRIPTION	View south. View of backfilled and seeded excavation area.	15
	SITE NAME	Windward West CTB Release (NAPP2409948979) Windward Federal #002H FL Release (NAPP2413732369)	05/23/2025



TETRA TECH, INC. PROJECT NO. 212C-MD-03441A	DESCRIPTION	View southwest. View of backfilled and seeded excavation area.	16
	SITE NAME	Windward West CTB Release (NAPP2409948979) Windward Federal #002H FL Release (NAPP2413732369)	05/23/2025

## **APPENDIX E**

### **Laboratory Analytical Data**



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

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May 22, 2025

LISBETH CHAVIRA

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: WINDWARD WEST CTB FLOWLINE RELEASE

Enclosed are the results of analyses for samples received by the laboratory on 05/21/25 15:03.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C24-00112. 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](http://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  
 LISBETH CHAVIRA  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	05/21/2025	Sampling Date:	05/21/2025
Reported:	05/22/2025	Sampling Type:	Soil
Project Name:	WINDWARD WEST CTB FLOWLINE RELE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03441A	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

**Sample ID: FS - 1 (H253049-01)**

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	05/21/2025	ND	1.93	96.4	2.00	2.09		
Toluene*	<0.050	0.050	05/21/2025	ND	2.11	105	2.00	1.72		
Ethylbenzene*	<0.050	0.050	05/21/2025	ND	2.01	100	2.00	2.67		
Total Xylenes*	<0.150	0.150	05/21/2025	ND	6.02	100	6.00	2.81		
Total BTEX	<0.300	0.300	05/21/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 102 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: KH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	208	16.0	05/22/2025	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	05/21/2025	ND	208	104	200	0.902	
DRO >C10-C28*	<10.0	10.0	05/21/2025	ND	205	102	200	0.843	
EXT DRO >C28-C36	<10.0	10.0	05/21/2025	ND					

Surrogate: 1-Chlorooctane 91.4 % 44.4-145

Surrogate: 1-Chlorooctadecane 83.6 % 40.6-153

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager





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**Analytical Results For:**

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

Received:	05/21/2025	Sampling Date:	05/21/2025
Reported:	05/22/2025	Sampling Type:	Soil
Project Name:	WINDWARD WEST CTB FLOWLINE RELE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03441A	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

**Sample ID: FS - 2 (H253049-02)**

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	05/21/2025	ND	1.93	96.4	2.00	2.09		
Toluene*	<0.050	0.050	05/21/2025	ND	2.11	105	2.00	1.72		
Ethylbenzene*	<0.050	0.050	05/21/2025	ND	2.01	100	2.00	2.67		
Total Xylenes*	<0.150	0.150	05/21/2025	ND	6.02	100	6.00	2.81		
Total BTEx	<0.300	0.300	05/21/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 103 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: KH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	3120	16.0	05/22/2025	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	05/21/2025	ND	208	104	200	0.902	
DRO >C10-C28*	<10.0	10.0	05/21/2025	ND	205	102	200	0.843	
EXT DRO >C28-C36	<10.0	10.0	05/21/2025	ND					

Surrogate: 1-Chlorooctane 91.8 % 44.4-145

Surrogate: 1-Chlorooctadecane 83.8 % 40.6-153

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

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

Received:	05/21/2025	Sampling Date:	05/21/2025
Reported:	05/22/2025	Sampling Type:	Soil
Project Name:	WINDWARD WEST CTB FLOWLINE RELE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03441A	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

**Sample ID: FS - 3 (H253049-03)**

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	05/21/2025	ND	1.93	96.4	2.00	2.09		
Toluene*	<0.050	0.050	05/21/2025	ND	2.11	105	2.00	1.72		
Ethylbenzene*	<0.050	0.050	05/21/2025	ND	2.01	100	2.00	2.67		
Total Xylenes*	<0.150	0.150	05/21/2025	ND	6.02	100	6.00	2.81		
Total BTEx	<0.300	0.300	05/21/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 103 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: KH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	1660	16.0	05/22/2025	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	05/21/2025	ND	208	104	200	0.902	
DRO >C10-C28*	<10.0	10.0	05/21/2025	ND	205	102	200	0.843	
EXT DRO >C28-C36	<10.0	10.0	05/21/2025	ND					

Surrogate: 1-Chlorooctane 94.2 % 44.4-145

Surrogate: 1-Chlorooctadecane 87.1 % 40.6-153

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

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

Received:	05/21/2025	Sampling Date:	05/21/2025
Reported:	05/22/2025	Sampling Type:	Soil
Project Name:	WINDWARD WEST CTB FLOWLINE RELE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03441A	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

**Sample ID: NSW - 1 (H253049-04)**

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	05/21/2025	ND	1.93	96.4	2.00	2.09		
Toluene*	<0.050	0.050	05/21/2025	ND	2.11	105	2.00	1.72		
Ethylbenzene*	<0.050	0.050	05/21/2025	ND	2.01	100	2.00	2.67		
Total Xylenes*	<0.150	0.150	05/21/2025	ND	6.02	100	6.00	2.81		
Total BTEx	<0.300	0.300	05/21/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 104 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: KH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	48.0	16.0	05/22/2025	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	05/21/2025	ND	208	104	200	0.902	
DRO >C10-C28*	<10.0	10.0	05/21/2025	ND	205	102	200	0.843	
EXT DRO >C28-C36	<10.0	10.0	05/21/2025	ND					

Surrogate: 1-Chlorooctane 91.8 % 44.4-145

Surrogate: 1-Chlorooctadecane 82.1 % 40.6-153

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

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

Received:	05/21/2025	Sampling Date:	05/21/2025
Reported:	05/22/2025	Sampling Type:	Soil
Project Name:	WINDWARD WEST CTB FLOWLINE RELE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03441A	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

**Sample ID: SSW - 1 (H253049-05)**

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	05/21/2025	ND	1.93	96.4	2.00	2.09		
Toluene*	<0.050	0.050	05/21/2025	ND	2.11	105	2.00	1.72		
Ethylbenzene*	<0.050	0.050	05/21/2025	ND	2.01	100	2.00	2.67		
Total Xylenes*	<0.150	0.150	05/21/2025	ND	6.02	100	6.00	2.81		
Total BTEx	<0.300	0.300	05/21/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 103 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: KH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	256	16.0	05/22/2025	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	05/21/2025	ND	208	104	200	0.902	
DRO >C10-C28*	<10.0	10.0	05/21/2025	ND	205	102	200	0.843	
EXT DRO >C28-C36	<10.0	10.0	05/21/2025	ND					

Surrogate: 1-Chlorooctane 99.5 % 44.4-145

Surrogate: 1-Chlorooctadecane 90.5 % 40.6-153

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

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

Received:	05/21/2025	Sampling Date:	05/21/2025
Reported:	05/22/2025	Sampling Type:	Soil
Project Name:	WINDWARD WEST CTB FLOWLINE RELE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03441A	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

**Sample ID: ESW - 1 (H253049-06)**

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	05/21/2025	ND	1.93	96.4	2.00	2.09		
Toluene*	<0.050	0.050	05/21/2025	ND	2.11	105	2.00	1.72		
Ethylbenzene*	<0.050	0.050	05/21/2025	ND	2.01	100	2.00	2.67		
Total Xylenes*	<0.150	0.150	05/21/2025	ND	6.02	100	6.00	2.81		
Total BTEX	<0.300	0.300	05/21/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 102 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: KH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	112	16.0	05/22/2025	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	05/21/2025	ND	208	104	200	0.902	
DRO >C10-C28*	<10.0	10.0	05/21/2025	ND	205	102	200	0.843	
EXT DRO >C28-C36	<10.0	10.0	05/21/2025	ND					

Surrogate: 1-Chlorooctane 94.2 % 44.4-145

Surrogate: 1-Chlorooctadecane 87.1 % 40.6-153

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager





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**Analytical Results For:**

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

Received:	05/21/2025	Sampling Date:	05/21/2025
Reported:	05/22/2025	Sampling Type:	Soil
Project Name:	WINDWARD WEST CTB FLOWLINE RELE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03441A	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

**Sample ID: WSW - 1 (H253049-07)**

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	05/21/2025	ND	1.93	96.4	2.00	2.09		
Toluene*	<0.050	0.050	05/21/2025	ND	2.11	105	2.00	1.72		
Ethylbenzene*	<0.050	0.050	05/21/2025	ND	2.01	100	2.00	2.67		
Total Xylenes*	<0.150	0.150	05/21/2025	ND	6.02	100	6.00	2.81		
Total BTEx	<0.300	0.300	05/21/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 102 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: KH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	05/22/2025	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	05/21/2025	ND	208	104	200	0.902	
DRO >C10-C28*	<10.0	10.0	05/21/2025	ND	205	102	200	0.843	
EXT DRO >C28-C36	<10.0	10.0	05/21/2025	ND					

Surrogate: 1-Chlorooctane 97.9 % 44.4-145

Surrogate: 1-Chlorooctadecane 90.6 % 40.6-153

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



---

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### Notes and Definitions

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

---

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A handwritten signature in black ink, appearing to read "Celey D. Keene", is written over a horizontal line.

---

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: Lisbeth Chavira  
Address: 8911 Capital o Texas Hwy, Suite 2310  
City: Austin State: TX Zip:   
Phone #: (512)565-0190 Fax #:   
Project #: 212C-MD-03441A Project Owner: Comoco/Phillips  
Project Name: Windward West CTB Releases  
Project Location: Lea County, New Mexico  
Sampler Name: Colton Bickerstaff

P.O. #:   
Company: Tetra Tech  
Attn: Lisbeth Chavira  
Address: EMAIL  
City:   
State: Zip:   
Phone #:   
Fax #:

**BILL TO**

**ANALYSIS REQUEST**

FOR LAB USE ONLY

Lab I.D. **HS3049**

Sample I.D. **1**

Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX										DATE	TIME	TPH 8015M	BTEX 8021B	Chloride SM4500CI-B	
			GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER : ACID/BASE:	ICE / COOL	OTHER :	DATE	TIME						
1 FS-1	C 1	1	X															
2 FS-2	C 1	1	X															
3 FS-3	C 1	1	X															
4 NSW-1	C 1	1	X															
5 SSW-1	C 1	1	X															
6 ESW-1	C 1	1	X															
7 WSW-1	C 1	1	X															

FOR LAB USE ONLY

Lab I.D. **HS3049**

Sample I.D. **1**

Time: **1503** Date: **5/21/25** Received By: **Monica [Signature]**

Time: **4:00** Date: **5/21/25** Received By: **[Signature]**

Observed Temp. °C **43.3** Corrected Temp. °C **40.0**

Sample Condition ☒ Cool ☐ Wet ☐ No

Thermometer ID **113** Standard ☐ Serial ☐ Observed Temp. °C **40.3**

Correction Factor **0.3** ☐ Yes ☐ No

Turnaround Time: **5/21/25**

Verbal Result: ☐ Yes ☐ No Add'l Phone #: **512-565-0190**

All Results are emailed. Please provide Email address: **Lisbeth.Chavira@tetratech.com**

REMARKS:

FORM-008 R 3.2 10/07/21

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



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

---

May 23, 2025

LISBETH CHAVIRA

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: WINDWARD WEST CTB FLOWLINE RELEASE

Enclosed are the results of analyses for samples received by the laboratory on 05/22/25 15:08.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C24-00112. 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](http://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 fluid and cursive, with the first name "Celey" and last name "Keene" clearly distinguishable.

Celey D. Keene

Lab Director/Quality Manager



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

**Analytical Results For:**

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

Received:	05/22/2025	Sampling Date:	05/22/2025
Reported:	05/23/2025	Sampling Type:	Soil
Project Name:	WINDWARD WEST CTB FLOWLINE RELE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03441A	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

**Sample ID: BACKFILL - COMPOSITE (H253078-01)**

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	05/22/2025	ND	2.21	110	2.00	3.62	
Toluene*	<0.050	0.050	05/22/2025	ND	2.23	111	2.00	3.73	
Ethylbenzene*	<0.050	0.050	05/22/2025	ND	2.17	108	2.00	3.45	
Total Xylenes*	<0.150	0.150	05/22/2025	ND	6.38	106	6.00	3.65	
Total BTEX	<0.300	0.300	05/22/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 97.6 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: KH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	05/23/2025	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	05/22/2025	ND	185	92.6	200	0.540	
DRO >C10-C28*	<10.0	10.0	05/22/2025	ND	182	90.9	200	5.18	
EXT DRO >C28-C36	<10.0	10.0	05/22/2025	ND					

Surrogate: 1-Chlorooctane 101 % 44.4-145

Surrogate: 1-Chlorooctadecane 104 % 40.6-153

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

---

### 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

---

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.

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

---

Celey D. Keene, Lab Director/Quality Manager

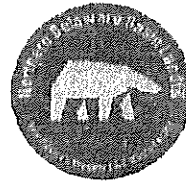


## **APPENDIX F**

### **Waste Manifests**



Customer Copy



Northern Delaware Basin Landfill  
2029 West NM Hwy 128  
Jal NM 88252

## WASTE TICKET

Ticket # 327091

Start: 05/21/2025 09:56 AM

End: 05/21/2025 09:57 AM

By: owl.lisanda

GROSS	TARE	NET	PRICE	AMOUNT
Contaminated Soil				
18	0	18	\$0.01	\$0.18
Hauler: McNabb Driver: Albara Tercero Lease: Windward West CYB Well: N/A AFE #: WA0000738600RM County, State: LEA (NM) API #: N/A Manifest #: 1 Client Company Man: Ike Tavaraz Rig Name & Number: N/A Trucking Co Ticket #: N/A Truck Type: Dump Truck UDM: CuYd UDM Count: 18 PF Test Result: Pass H2S Test: Pass				
H2S Testing	PASS			
1	0	1	\$0.00	\$0.00
Paint Filter	PASS			
1	0	1	\$0.00	\$0.00
NORM	PASS			
1	0	1	\$0.00	\$0.00
Additional Photos				
1	0	1	\$0.00	\$0.00
22		0.0 lbs	\$0.01	\$0.18

SUBTOTAL --> \$0.18  
TAX --> \$0.01  
ROUNDING --> \$0.00  
TOTAL --> \$0.19

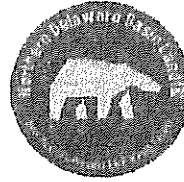
Date	Type	Amount
	CASH	\$0.19

Customer: ConocoPhillips Company  
Driver: Karen Work

*Albara Tercero*



Customer Copy



Northern Delaware Basin Landfill  
2029 West NM Hwy 128  
Jal NM 88252

## ---WASTE TICKET---

Ticket # 327115

Start: 05/21/2025 11:15 AM

End: 05/21/2025 11:22 AM

By: owl.jasmine

GROSS	TARE	NET	PRICE	AMOUNT
Contaminated Soil				
10	0	10	\$0.01	\$0.18
Hauler: McNabb Driver: Alvaro Tercero Lease: Windward West CTB Release Well: N/A AFE #: WA0000798600RM County, State: IEA (NM) API #: N/A Manifest #: 2 Client Company Name: The Tavaraz Rig Name & Number: N/A Trucking Co ticket #: N/A Truck Type: Dump Truck UOM: Coyd UOM Count: 18 PF Test Result: Fail H2S Test: Pass H2S Testing - PASS 1 0 1 \$0.00 \$0.00 Pilot Filter - FAIL 1 0 1 \$0.00 \$0.00 NORM - PASS 1 0 1 \$0.00 \$0.00 Additional Photos 1 0 1 \$0.00 \$0.00 22 0.0 lbs \$0.01 \$0.18 SUBTOTAL > \$0.18 TAX > \$0.01 ROUNDING > \$0.00 TOTAL > \$0.19				

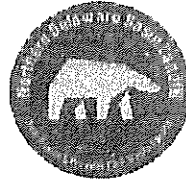
Date	Type	Amount
	CASH	\$0.19

Customer: ComcoPhillips Company  
Driver: Karen Ruck





Customer Copy



Northern Delaware Basin Landfill  
2029 West NM Hwy 128  
Jal NM 86252

## WASTE TICKET

Ticket # 327129

Start: 05/21/2025 12:39 PM

End: 05/21/2025 12:44 PM

By: owl.lisanda

GRUSS	TARE	NET	PRICE	AMOUNT
Contaminated Soil				
18	0	18	\$0.01	\$0.18
Hauler: McNabb Partners				
Driver: Albano Torcero				
Lease: Windward West CIB				
Well: N/A				
AFE #: WAB000/38600NM				
County: State: IEA (NM)				
API #: N/A				
Manifest #: 3				
Client Company Man: Ike Iavaroz				
Rig Name & Number: N/A				
Trucking Co Ticket #: N/A				
Truck type: Dump Truck				
UOM: CuYd				
UOM Count: 18				
PF Test Result: Pass				
H2S Test: Pass				
H2S testing	PASS			
1	0	1	\$0.00	\$0.00
Paint Filter	PASS			
1	0	1	\$0.00	\$0.00
NORM	PASS			
1	0	1	\$0.00	\$0.00
Additional Photos				
1	0	1	\$0.00	\$0.00
22		0.0 lbs	\$0.01	\$0.19
			SUBTOTAL	\$0.18
			TAX	\$0.01
			ROUNDING	\$0.00
			TOTAL	\$0.19

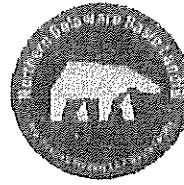
Date	Type	Amount
	CASH	\$0.19

Customer: ConocoPhillips Company  
Driver: Karen Work

*Allen Zuer*



Customer Copy



Northern Delaware Basin Landfill  
2029 West NM Hwy 128  
Jai NM 88252

## WASTE TICKET

Ticket # 327152  
Start: 05/21/2025 02:44 PM  
End: 05/21/2025 02:55 PM  
By: owl.lisanda

GROSS	TARE	NET	PRICE	AMOUNT
Contaminated Soil				
18	0	18	\$0.01	\$0.18

Hauler: McNabb Partners  
Driver: Albano Tercero  
Leaser: Windward West CTB Release  
Well: N/A  
AFE #: WA0600/38600RM  
County, State: LEA (NM)  
API #: N/A  
Manifest #: 4  
Client Company Name: Ito Tavaroz  
Rig Name & Number: N/A  
Trucking Co Ticket #: N/A  
Truck Type: Dump Truck  
UOM: CuYd  
UOM Count: 18  
PF Test Result: Pass  
H2S Test: Pass

H2S Testing - PASS				
1	0	1	\$0.00	\$0.00

Paint Filter - PASS				
1	0	1	\$0.00	\$0.00

NORM - PASS				
1	0	1	\$0.00	\$0.00

Additional Photos				
1	0	1	\$0.00	\$0.00

22	0.0102		\$0.01	\$0.18
----	--------	--	--------	--------

SUBTOTAL	>	\$0.18
TAX	>	\$0.01
ROUNDING	>	\$0.00
TOTAL	>	\$0.19

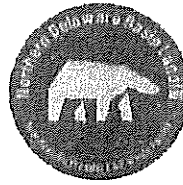
Date	Type	Amount
	CASH	\$0.19

Customer: Conso of Phillips Company  
Driver: Karen Worth

*Albano Tercero*



Customer Copy



Northern Delaware Basin Landfill  
2029 West NM Hwy 128  
Jal NM 88252

## ---WASTE TICKET---

Ticket # 327233

Start: 05/22/2025 10:35 AM

End: 05/22/2025 10:46 AM

By: OWL Ivan

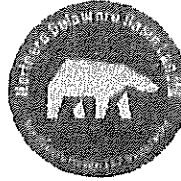
GROSS	TARE	NET	PRICE	AMOUNT
<b>Contaminated Soil</b>				
16	0	16	\$0.01	\$0.16
Hauler: McHabb Partners				
Driver: Albano Tercero				
Leaser: Windward West CTB Release				
Well: N/A				
AFE #: N/A				
County, State: LEA (NM)				
API #: N/A				
Manifest #: 5				
Client Company Man: Ike Tavaroz				
Rig Name & Number: N/A				
Trucking Co Ticket #: N/A				
Truck Type: Dump Truck				
UDM: CuYd				
UDM Count: 16				
PF Test Result: Pass				
H2S Test: Pass				
<b>H2S Testing - PASS</b>				
1	0	1	\$0.00	\$0.00
<b>Paint Filter - PASS</b>				
1	0	1	\$0.00	\$0.00
<b>NORM - PASS</b>				
1	0	1	\$0.00	\$0.00
<b>Additional Photos</b>				
1	0	1	\$0.00	\$0.00
30		0.0 lbs	\$0.01	\$0.16
<b>SUBTOTAL</b>				\$0.16
<b>TAX</b>				\$0.01
<b>ROUNDING</b>				\$0.00
<b>TOTAL</b>				\$0.17

Date	Type	Amount
	CASH	\$0.17

Customer: GeneralPhillips Company  
Driver: Karen Work



Customer Copy



Northern Delaware Basin Landfill  
2029 West NM Hwy 128  
Jal NM 88252

## ---WASTE TICKET---

Ticket # 927285

Start: 05/22/2025 03:47 PM

End: 05/22/2025 03:58 PM

By: DNL Ivan

GROSS	TARE	NET	PRICE	AMOUNT
Contaminated Soil				
16	0	16	\$0.01	\$0.16
Hauler: McNabb Partners				
Driver: Albano Tercero				
Lease: Windward West CIB Release				
Well: N/A				
AFE #: WBS WAD000738600RM				
County, State: LEA (NM)				
API #: N/A				
Manifest #: 6				
Client Company Man: Ihe Tavaroz				
Rig Name & Number: N/A				
Trucking Co Ticket #: N/A				
Truck Type: Dump Truck				
UOM: CuYd				
UOM Count: 16				
PF Test Result: Pass				
H2S Test: Pass				
H2S Testing - PASS				
1	0	1	\$0.00	\$0.00
Paint Filter - PASS				
1	0	1	\$0.00	\$0.00
NORM - PASS				
1	0	1	\$0.00	\$0.00
Additional Photos				
1	0	1	\$0.00	\$0.00
20		0.0 lbs	\$0.01	\$0.16
			SUBTOTAL	\$0.16
			TAX	\$0.01
			ROUNDING	\$0.00
			TOTAL	\$0.17

Date	Type	Amount
	CASH	\$0.17

Customer: ConocoPhillips Company  
Driver: Ragan Work



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 478998

QUESTIONS

Operator: COG PRODUCTION, LLC 600 W. Illinois Ave Midland, TX 79701	OGRID: 217955
	Action Number: 478998
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2409948979
Incident Name	NAPP2409948979 WINDWARD WEST CTB @ 0
Incident Type	Produced Water Release
Incident Status	Reclamation Report Received
Incident Facility	[fDHR1921042438] WINDWARD WEST CTB

Location of Release Source	
Please answer all the questions in this group.	
Site Name	WINDWARD WEST CTB
Date Release Discovered	04/01/2024
Surface Owner	Federal

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

Nature and Volume of Release	
Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.	
Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Corrosion   Flow Line - Production   Produced Water   Released: 13 BBL   Recovered: 10 BBL   Lost: 3 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 478998

**QUESTIONS (continued)**

Operator: COG PRODUCTION, LLC 600 W. Illinois Ave Midland, TX 79701	OGRID: 217955
	Action Number: 478998
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

**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: 09/12/2024
--	--

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 478998

**QUESTIONS (continued)**

Operator: COG PRODUCTION, LLC 600 W. Illinois Ave Midland, TX 79701	OGRID: 217955
	Action Number: 478998
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

**QUESTIONS**

<b>Site Characterization</b>	
<i>Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 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
<b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>	
A continuously flowing watercourse or any other significant watercourse	Greater than 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 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	Greater than 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1 and 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	Low
A 100-year floodplain	Greater than 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

<b>Remediation Plan</b>	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No
<b>Soil Contamination Sampling:</b> (Provide the highest observable value for each, in milligrams per kilograms.)	
Chloride (EPA 300.0 or SM4500 Cl B)	12800
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	227
GRO+DRO (EPA SW-846 Method 8015M)	181
BTEX (EPA SW-846 Method 8021B or 8260B)	0
Benzene (EPA SW-846 Method 8021B or 8260B)	0
<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	12/09/2024
On what date will (or did) the final sampling or liner inspection occur	12/11/2024
On what date will (or was) the remediation complete(d)	12/13/2024
What is the estimated surface area (in square feet) that will be reclaimed	2383
What is the estimated volume (in cubic yards) that will be reclaimed	332
What is the estimated surface area (in square feet) that will be remediated	2383
What is the estimated volume (in cubic yards) that will be remediated	332
<i>These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.</i>	
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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**Oil Conservation Division**  
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**Santa Fe, NM 87505**

QUESTIONS, Page 4

Action 478998

**QUESTIONS (continued)**

Operator: COG PRODUCTION, LLC 600 W. Illinois Ave Midland, TX 79701	OGRID: 217955
	Action Number: 478998
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

**QUESTIONS**

<b>Remediation Plan (continued)</b>	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
<b>This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:</b>	
<i>(Select all answers below that apply.)</i>	
(Ex Situ) Excavation and <b>off-site</b> disposal (i.e. dig and haul, hydrovac, etc.)	Yes
Which OCD approved facility will be used for <b>off-site</b> disposal	HALFWAY DISPOSAL AND LANDFILL [FEEM0112334510]
<b>OR</b> which OCD approved well (API) will be used for <b>off-site</b> disposal	Not answered.
<b>OR</b> is the <b>off-site</b> disposal site, to be used, out-of-state	No
<b>OR</b> is the <b>off-site</b> disposal site, to be used, an NMED facility	No
(Ex Situ) Excavation and <b>on-site</b> remediation (i.e. On-Site Land Farms)	No
(In Situ) Soil Vapor Extraction	No
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	No
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	No
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	No
Ground Water Abatement pursuant to 19.15.30 NMAC	No
OTHER (Non-listed remedial process)	No
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
I hereby agree and sign off to the above statement	Name: Christian LLuLL Title: Project Manager Email: christian.llull@tetrattech.com Date: 09/12/2024
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	



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QUESTIONS, Page 5

Action 478998

QUESTIONS (continued)

Operator:  COG PRODUCTION, LLC 600 W. Illinois Ave Midland, TX 79701	OGRID:  217955
	Action Number:  478998
	Action Type:  [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

QUESTIONS

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

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Action 478998

**QUESTIONS (continued)**

Operator: COG PRODUCTION, LLC 600 W. Illinois Ave Midland, TX 79701	OGRID: 217955
	Action Number: 478998
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

**QUESTIONS**

Sampling Event Information	
Last sampling notification (C-141N) recorded	463779
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	05/21/2025
What was the (estimated) number of samples that were to be gathered	7
What was the sampling surface area in square feet	450

**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	399
What was the total volume (cubic yards) remediated	104
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	399
What was the total volume (in cubic yards) reclaimed	104
Summarize any additional remediation activities not included by answers (above)	Following excavation, confirmation floor and sidewall samples were collected from the excavated area and submitted for laboratory analysis to verify efficacy of remediation activities. Per the NMOCD conditions of approval, confirmation samples were collected such that each sample (sidewall and floor) was representative of no more than 200 square feet of excavated area. The square footage of the additional area remediated was approximately 399 sf. A total of three (3) confirmation floor sample locations and four (4) confirmation sidewall sample locations were used for laboratory analysis during remedial activities. Confirmation sidewall sample locations were categorized with the cardinal direction (N, E, S, W) followed by SW-#. Confirmation floor sample locations were labeled with FS-#.

*The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (in .pdf format) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

I hereby agree and sign off to the above statement	Name: Christian LLuLL Title: Project Manager Email: christian.llull@tetrattech.com Date: 06/25/2025
--	--

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Action 478998

**QUESTIONS (continued)**

Operator: COG PRODUCTION, LLC 600 W. Illinois Ave Midland, TX 79701	OGRID: 217955
	Action Number: 478998
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

**QUESTIONS**

<b>Reclamation Report</b>	
<i>Only answer the questions in this group if all reclamation steps have been completed.</i>	
Requesting a reclamation approval with this submission	Yes
What was the total reclamation surface area (in square feet) for this site	399
What was the total volume of replacement material (in cubic yards) for this site	104
<i>Per Paragraph (1) of Subsection D of 19.15.29.13 NMAC the reclamation must contain a minimum of four feet of non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, or other test methods approved by the division. The soil cover must include a top layer, which is either the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater.</i>	
Is the soil top layer complete and is it suitable material to establish vegetation	Yes
On what (estimated) date will (or was) the reseeding commence(d)	05/23/2025
Summarize any additional reclamation activities not included by answers (above)	material to pre-release grade. In accordance with 19.15.29.12 NMAC, the reclaimed area contained a minimum of four feet of non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg as analyzed by SM4500Cl-B. The soil cover included a top layer consisting of one foot of suitable material to establish vegetation at the site. The backfilled areas in the pasture were seeded following backfilling, to aid in revegetation. Based on the soils of the site, the BLM Seed Mix #2 was used for seeding and was planted in the amount specified in the pounds pure live seed (PLS) per acre. One (1) representative 5-point composite sample was collected from the backfill material used for the reclamation of the project site.
<i>The responsible party must attach information demonstrating they have complied with all applicable reclamation requirements and any conditions or directives of the OCD. This demonstration should be in the form of attachments (in .pdf format) including a scaled site map, any proposed reseeding plans or relevant field notes, photographs of reclaimed area, and a narrative of the reclamation activities. Refer to 19.15.29.13 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: Christian LLuLL Title: Project Manager Email: christian.llull@tetrattech.com Date: 06/25/2025

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Action 478998

QUESTIONS (continued)

Operator:  COG PRODUCTION, LLC 600 W. Illinois Ave Midland, TX 79701	OGRID:  217955
	Action Number:  478998
	Action Type:  [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

QUESTIONS

<b>Revegetation Report</b>	
<i>Only answer the questions in this group if all surface restoration, reclamation and re-vegetation obligations have been satisfied.</i>	
Requesting a restoration complete approval with this submission	No
<i>Per Paragraph (4) of Subsection (D) of 19.15.29.13 NMAC for any major or minor release containing liquids, the responsible party must notify the division when reclamation and re-vegetation are complete.</i>	



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CONDITIONS

Action 478998

CONDITIONS

Operator: COG PRODUCTION, LLC 600 W. Illinois Ave Midland, TX 79701	OGRID: 217955
	Action Number: 478998
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

CONDITIONS

Created By	Condition	Condition Date
scwells	None	6/26/2025