

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

Our Ref.: 12666911-NMOCD-1

April 21, 2025

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

Closure Report
ConocoPhillips Company
Atticus State 36N Central Tank Battery
Unit Letter N, Section 36, T25S, R27E
Eddy County, New Mexico
(32.08083, -104.144056)

1. Introduction

GHD Services Inc. (GHD), on behalf of ConocoPhillips Company (Conoco) has prepared this *Closure Report* to document Site assessment activities at Atticus State 36N Central Tank Battery (Site). The purpose of the assessment was to determine the presence or absence of impacts to soil following a release of produced water within a lined containment at the Site. Based on field observations, Conoco is submitting this *Closure Report*, describing site assessment activities that have occurred and requesting closure for Incident Number nAPP2507433767.

2. Site Description and Release Summary

The Site is in Unit N, Section 36, Township 25 South, Range 27 East, in Eddy County, New Mexico (32.08083, -104.144056) and is associated with oil and gas exploration and production operations on State Land managed by the New Mexico State Land Office (NMSLO).

On March 15, 2025, approximately 361 barrels (bbls) of produced water were released into the lined secondary containment due to internal corrosion. A vacuum truck was dispatched to the Site to recover free-standing fluids; approximately 360 bbls of released produced water were recovered from within the lined containment. The release was reported to the New Mexico Oil Conservation Division (NMOCD) on March 15, 2025, and was subsequently assigned Incident Number nAPP2507433767.

3. Site Characterization and Closure Criteria

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

According to the soil survey provided by the United States Department of Agriculture National Resources Conservation Services, the soils located within the Site consists of Reeves-Reagan loams. Reeves-Reagan loams is not considered a sensitive soil. Per the New Mexico Bureau of Geology and Mineral Resources, the shallow geology consists of the Rustler Formation, siltstone, gypsum, sandstone, and dolomite. The Site is located within an area of high karst potential.

Depth to groundwater at the Site is estimated to be between 51 and 100 feet below ground surface (ft bgs) based on the nearest groundwater well data. Groundwater was determined utilizing the New Mexico Office of the State Engineers (NMOSE) database for registered water wells. The nearest permitted groundwater well with depth to groundwater data is NMOSE well C-04371-POD1, located approximately 1.4 miles northwest of the Site, completed to a total depth of 100 ft bgs. The groundwater has a reported depth to static groundwater of 69 ft bgs on October 17, 2019. A copy of the referenced well record is included in **Attachment 1**.

The closest continuously flowing or significant watercourse to the Site is a draw, located approximately 5,057 ft northeast of the Site. The nearest fresh water well for livestock watering purposes is located approximately 0.84 miles southwest of the Site. The Site is greater than 200 ft from a lakebed, sinkhole, or playa lake, and greater than 300 ft from an occupied residence, school, hospital, institution, church, or wetland. The Site is greater than 1,000 ft to a freshwater well or spring and is not within a 100-year floodplain or overlying a subsurface mine. The location of the Site is depicted on **Figure 1**. A detailed map of the Site is provided on **Figure 2**. The Site Characterization Documentation is included in **Attachment 2**.

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

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

Regulatory Standard	Benzene (mg/kg)	BTEX (mg/kg)	TPH (GRO+DRO) (mg/kg)	TPH (GRO+DRO+MRO) (mg/kg)	Chloride (mg/kg)
19.15.29.12 NMAC Table I Closure Criteria for Soils Impacted by a Release.	10	50	---	100	600

Notes:

--- = not defined.

TPH = total petroleum hydrocarbons.

GRO+DRO+MRO = Gasoline Range Organics + Diesel Range Organics + Motor Oil/Lube Range Organics.

BTEX = benzene, toluene, ethylbenzene, and xylene.

4. Site Assessment Activities

The liner inspection notice was provided on March 26, 2025. A liner integrity inspection was completed on March 28, 2025, after the secondary containment was cleaned for a visual inspection. The liner was visually inspected and no rips, tears, holes, or damages in the liner were observed. The liner was determined to be intact with no integrity issues. Photographic documentation of the liner inspection is presented in **Attachment 3**.

5. Closure Request

Based on the liner inspection and assessment activities at the Site, Conoco respectfully requests that no further actions be required, and requests closure of Incident Number nAPP2507433767 be granted.

Should you have any questions or require additional information, please do not hesitate to contact GHD.

Regards,

GHD



Kayla Taylor
Senior Project Manager

+1 432-210-5443
kayla.taylor@ghd.com

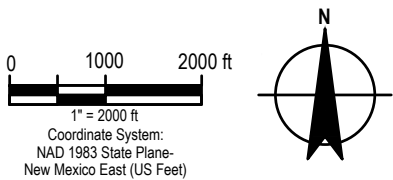
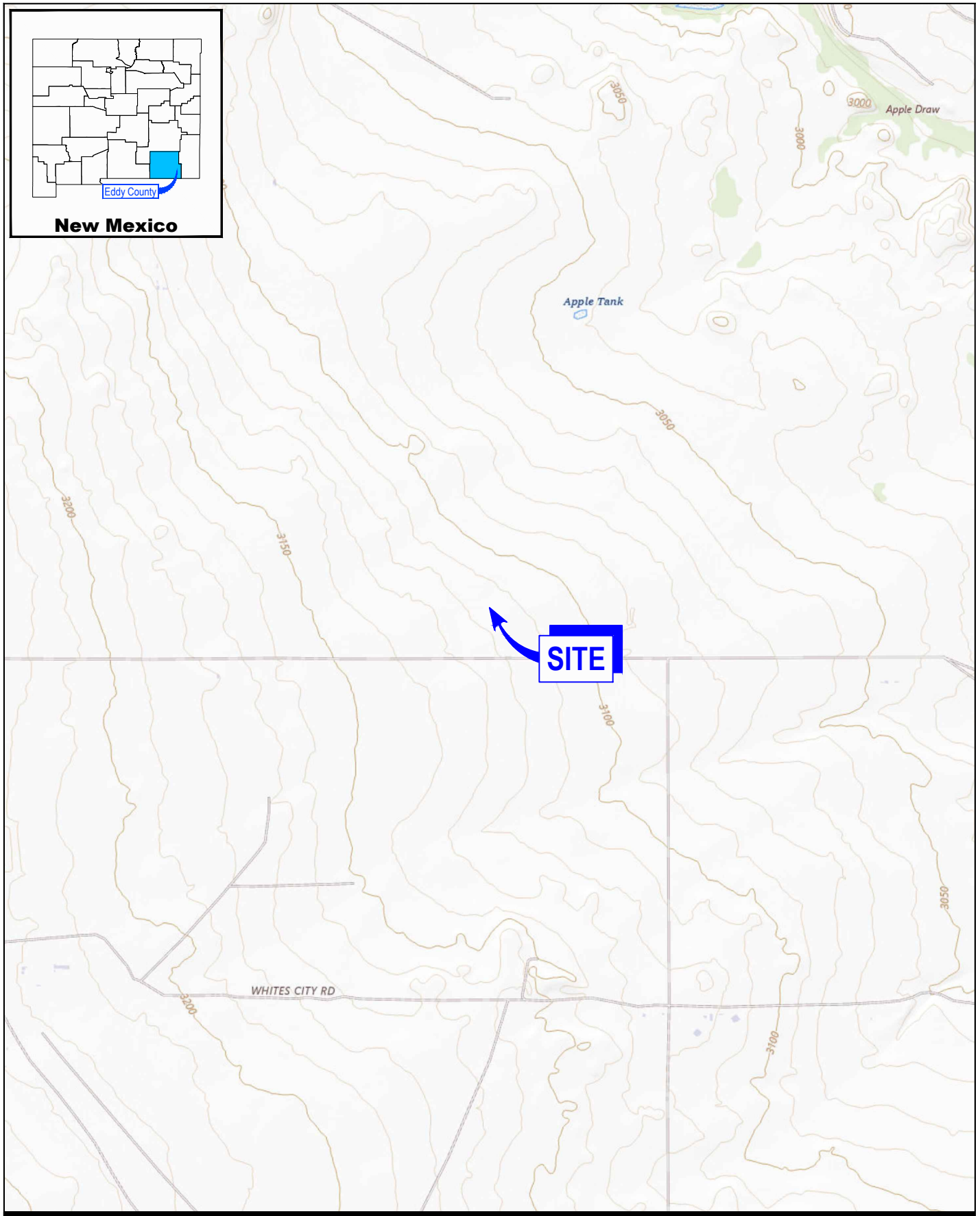
KT/jlf/1



Jessica Wright
Project Director

+1 713-337-5419
jessica.wright@ghd.com

Encl.: Figure 1 - Site Location Map
 Figure 2 - Site Details Map
 Attachment 1 - Referenced Well Records
 Attachment 2 - Site Characterization Documentation
 Attachment 3 - Photographic Documentation

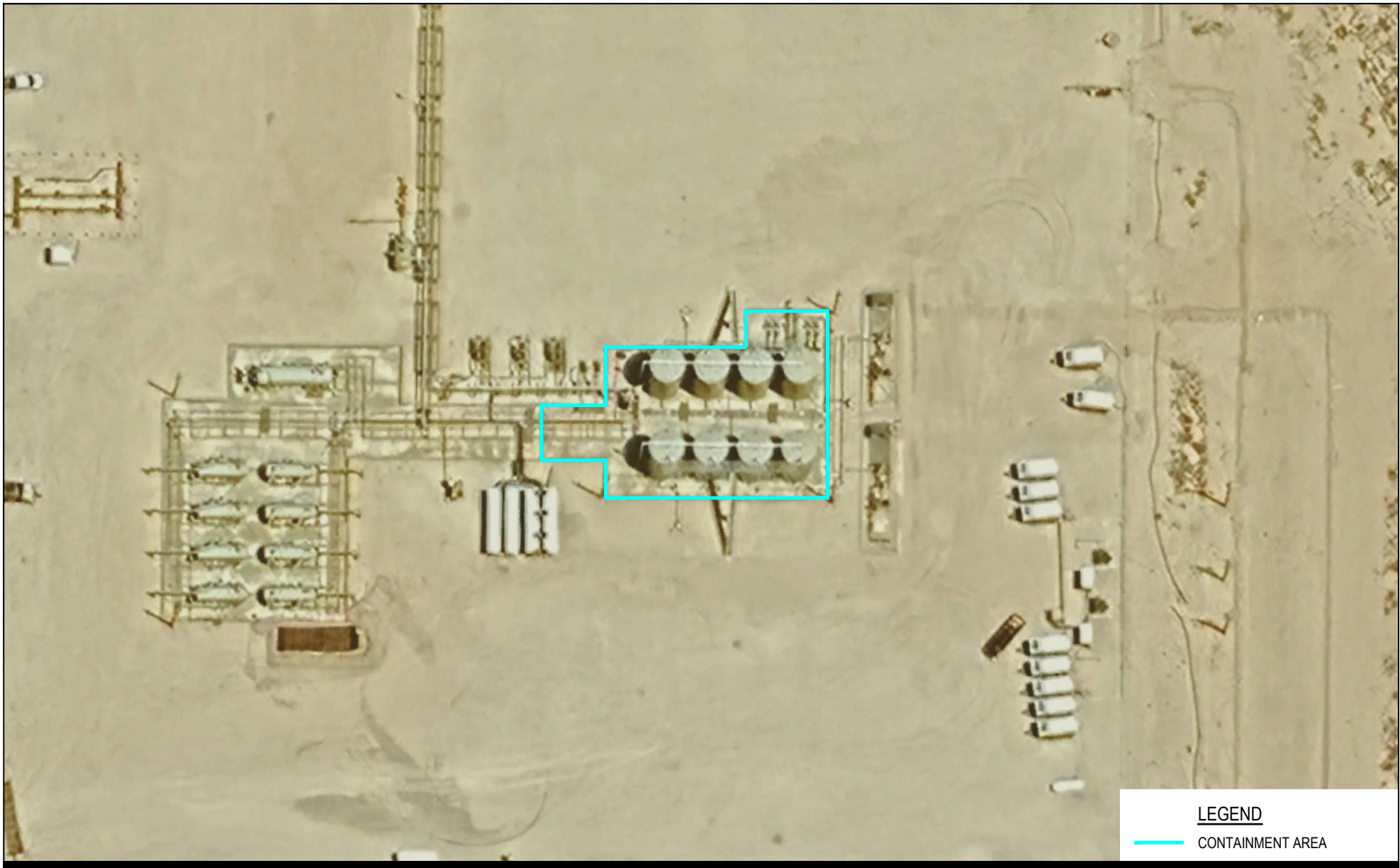


CONOCOPHILLIPS COMPANY
EDDY COUNTY, NEW MEXICO
ATTICUS STATE 36N CENTRAL TANK BATTERY
INCIDENT No. nAPP2507433767

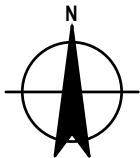
Project No. 12666811
Date April 2025

SITE LOCATION MAP

FIGURE 1



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



CONOCOPHILLIPS COMPANY
EDDY COUNTY, NEW MEXICO
ATTICUS STATE 36N CENTRAL TANK BATTERY
INCIDENT No. nAPP2507433767

Project No. 12666811
Date April 2025

SITE DETAILS MAP

FIGURE 2

Attachment 1

Well Reports



WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

www.ose.state.nm.us

2019 NOV - 4 PM 4:13
STATE ENGINEER'S OFFICE
ROSALIND, NEW MEXICO

1. GENERAL AND WELL LOCATION	OSE POD NO. (WELL NO.) N/A		WELL TAG ID NO.		OSE FILE NO(S). C-4371		
	WELL OWNER NAME(S) Tetra Tech Inc. on behalf of Chevron N.A. E&P Co.				PHONE (OPTIONAL) 432-687-8130		
	WELL OWNER MAILING ADDRESS 901 W. Wall St. Suite 100				CITY Midland	STATE TX	
	WELL LOCATION (FROM GPS)		DEGREES 32	MINUTES 5	SECONDS 41.91	N	* ACCURACY REQUIRED: ONE TENTH OF A SECOND * DATUM REQUIRED: WGS 84
DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS - PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE							
2. DRILLING & CASING INFORMATION	LICENSE NO. WD-1456		NAME OF LICENSED DRILLER John W. White			NAME OF WELL DRILLING COMPANY White Drilling Company, Inc.	
	DRILLING STARTED 10/17/2019		DRILLING ENDED 10/17/2019		DEPTH OF COMPLETED WELL (FT)	BORE HOLE DEPTH (FT) 100	
	COMPLETED WELL IS:		<input type="checkbox"/> ARTESIAN <input type="checkbox"/> DRY HOLE <input checked="" type="checkbox"/> SHALLOW (UNCONFINED)			DEPTH WATER FIRST ENCOUNTERED (FT) 69	
	DRILLING FLUID:		<input checked="" type="checkbox"/> AIR <input type="checkbox"/> MUD ADDITIVES - SPECIFY:				
	DRILLING METHOD:		<input checked="" type="checkbox"/> ROTARY <input type="checkbox"/> HAMMER <input type="checkbox"/> CABLE TOOL <input type="checkbox"/> OTHER - SPECIFY:				
	DEPTH (feet bgl)		BORE HOLE DIAM (inches)	CASING MATERIAL AND/OR GRADE (include each casing string, and note sections of screen)	CASING CONNECTION TYPE (add coupling diameter)	CASING INSIDE DIAM. (inches)	CASING WALL THICKNESS (inches)
	FROM	TO					
3. ANNULAR MATERIAL	DEPTH (feet bgl)		BORE HOLE DIAM. (inches)	LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL	AMOUNT (cubic feet)	METHOD OF PLACEMENT	
	FROM	TO					

FOR OSE INTERNAL USE

WR-20 WELL RECORD & LOG (Version 04/30/19)

FILE NO.	C-4371	POD NO.	1	TRN NO.	660311
LOCATION	255.27E.26.433			WELL TAG ID NO.	PAGE 1 OF 2

Released to Imaging: 9/15/2025 8:07:16 AM



PLUGGING RECORD



NOTE: A Well Plugging Plan of Operations shall be approved by the State Engineer prior to plugging - 19.27.4 NMAC

I. GENERAL / WELL OWNERSHIP:

State Engineer Well Number: N/A C-4371
 Well owner: Tetra Tech Inc. on behalf of Chevron N.A. E&P Co. Phone No.: 432-687-8130
 Mailing address: 901 W. Wall St. Suite 100
 City: Midland State: TX Zip code: 79708

II. WELL PLUGGING INFORMATION:

- 1) Name of well drilling company that plugged well: White Drilling Company, Inc.
- 2) New Mexico Well Driller License No.: WD-1456 Expiration Date: 09/30/2020
- 3) Well plugging activities were supervised by the following well driller(s)/rig supervisor(s): Dallas Rader
- 4) Date well plugging began: 10/17/2019 Date well plugging concluded: 10/17/2019
- 5) GPS Well Location: Latitude: 32 deg, 5 min, 41.91 sec
 Longitude: 104 deg, 9 min, 31.92 sec, WGS 84
- 6) Depth of well confirmed at initiation of plugging as: 100 ft below ground level (bgl),
 by the following manner: Water Level Meter
- 7) Static water level measured at initiation of plugging: 69 ft bgl
- 8) Date well plugging plan of operations was approved by the State Engineer: 10/9/2019
- 9) Were all plugging activities consistent with an approved plugging plan? Yes If not, please describe differences between the approved plugging plan and the well as it was plugged (attach additional pages as needed):

- For each interval plugged, describe within the following columns:**

[illegible]

MULTIPLY		BY	AND OBTAIN
cubic feet	x	7.4805	= gallons
cubic yards	x	201.97	= gallons

I, John White, say that I am familiar with the rules of the Office of the State Engineer pertaining to the plugging of wells and that each and all of the statements in this Plugging Record and attachments are true to the best of my knowledge and belief.

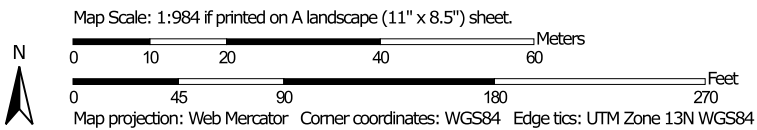
Signature of Well Driller

Date _____

Attachment 2

Site Characterization Documentation

Soil Map—Eddy Area, New Mexico




Natural Resources
Conservation Service

Web Soil Survey
National Cooperative Soil Survey


4/9/2025
Page 1 of 3

MAP LEGEND

Area of Interest (AOI)

 Area of Interest (AOI)

Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

Water Features



Streams and Canals

Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

Background



Aerial Photography

MAP INFORMATION

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

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

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

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

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

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

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

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

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

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

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

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
RG	Reeves-Gypsum land complex, 0 to 3 percent slopes	1.7	35.5%
RM	Reeves-Reagan loams, 0 to 3 percent slopes	3.1	64.5%
Totals for Area of Interest		4.8	100.0%

Map Unit Description: Reeves-Reagan loams, 0 to 3 percent slopes---Eddy Area, New Mexico

Eddy Area, New Mexico

RM—Reeves-Reagan loams, 0 to 3 percent slopes

Map Unit Setting

National map unit symbol: 1w5g

Elevation: 1,100 to 4,400 feet

Mean annual precipitation: 7 to 25 inches

Mean annual air temperature: 57 to 70 degrees F

Frost-free period: 200 to 240 days

Farmland classification: Not prime farmland

Map Unit Composition

Reeves and similar soils: 50 percent

Reagan and similar soils: 35 percent

Minor components: 15 percent

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

Description of Reeves

Setting

Landform: Ridges, plains, hills

Landform position (two-dimensional): Shoulder, backslope, footslope, toeslope

Landform position (three-dimensional): Side slope, head slope, nose slope, crest

Down-slope shape: Convex

Across-slope shape: Linear

Parent material: Residuum weathered from gypsum

Typical profile

H1 - 0 to 8 inches: loam

H2 - 8 to 32 inches: clay loam

H3 - 32 to 60 inches: gypsiferous material

Properties and qualities

Slope: 0 to 1 percent

Depth to restrictive feature: More than 80 inches

Drainage class: Well drained

Runoff class: Low

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

Depth to water table: More than 80 inches

Frequency of flooding: None

Frequency of ponding: None

Calcium carbonate, maximum content: 25 percent

Gypsum, maximum content: 80 percent

Maximum salinity: Very slightly saline to moderately saline (2.0 to 8.0 mmhos/cm)

Sodium adsorption ratio, maximum: 4.0

Available water supply, 0 to 60 inches: Low (about 4.3 inches)

Map Unit Description: Reeves-Reagan loams, 0 to 3 percent slopes---Eddy Area, New Mexico

Interpretive groups

Land capability classification (irrigated): 3s

Land capability classification (nonirrigated): 7s

Hydrologic Soil Group: B

Ecological site: R070BC007NM - Loamy

Hydric soil rating: No

Description of Reagan**Setting**

Landform: Fan remnants, alluvial fans

Landform position (three-dimensional): Rise

Down-slope shape: Convex, linear

Across-slope shape: Linear

Parent material: Alluvium and/or eolian deposits

Typical profile

H1 - 0 to 8 inches: loam

H2 - 8 to 30 inches: loam

H3 - 30 to 82 inches: clay loam

Properties and qualities

Slope: 0 to 3 percent

Depth to restrictive feature: More than 80 inches

Drainage class: Well drained

Runoff class: High

Capacity of the most limiting layer to transmit water

(Ksat): Moderately high to high (0.60 to 2.00 in/hr)

Depth to water table: More than 80 inches

Frequency of flooding: None

Frequency of ponding: None

Calcium carbonate, maximum content: 50 percent

Maximum salinity: Very slightly saline to moderately saline (2.0 to 8.0 mmhos/cm)

Sodium adsorption ratio, maximum: 15.0

Available water supply, 0 to 60 inches: Moderate (about 8.2 inches)

Interpretive groups

Land capability classification (irrigated): 2e

Land capability classification (nonirrigated): 6e

Hydrologic Soil Group: B

Ecological site: R070BC007NM - Loamy

Hydric soil rating: No

Minor Components**Cottonwood**

Percent of map unit: 5 percent

Ecological site: R070BB006NM - Gyp Upland

Hydric soil rating: No

Gypsum land

Percent of map unit: 5 percent



Map Unit Description: Reeves-Reagan loams, 0 to 3 percent slopes---Eddy Area, New Mexico

Hydric soil rating: No

Upton

Percent of map unit: 5 percent

Ecological site: R070BC025NM - Shallow

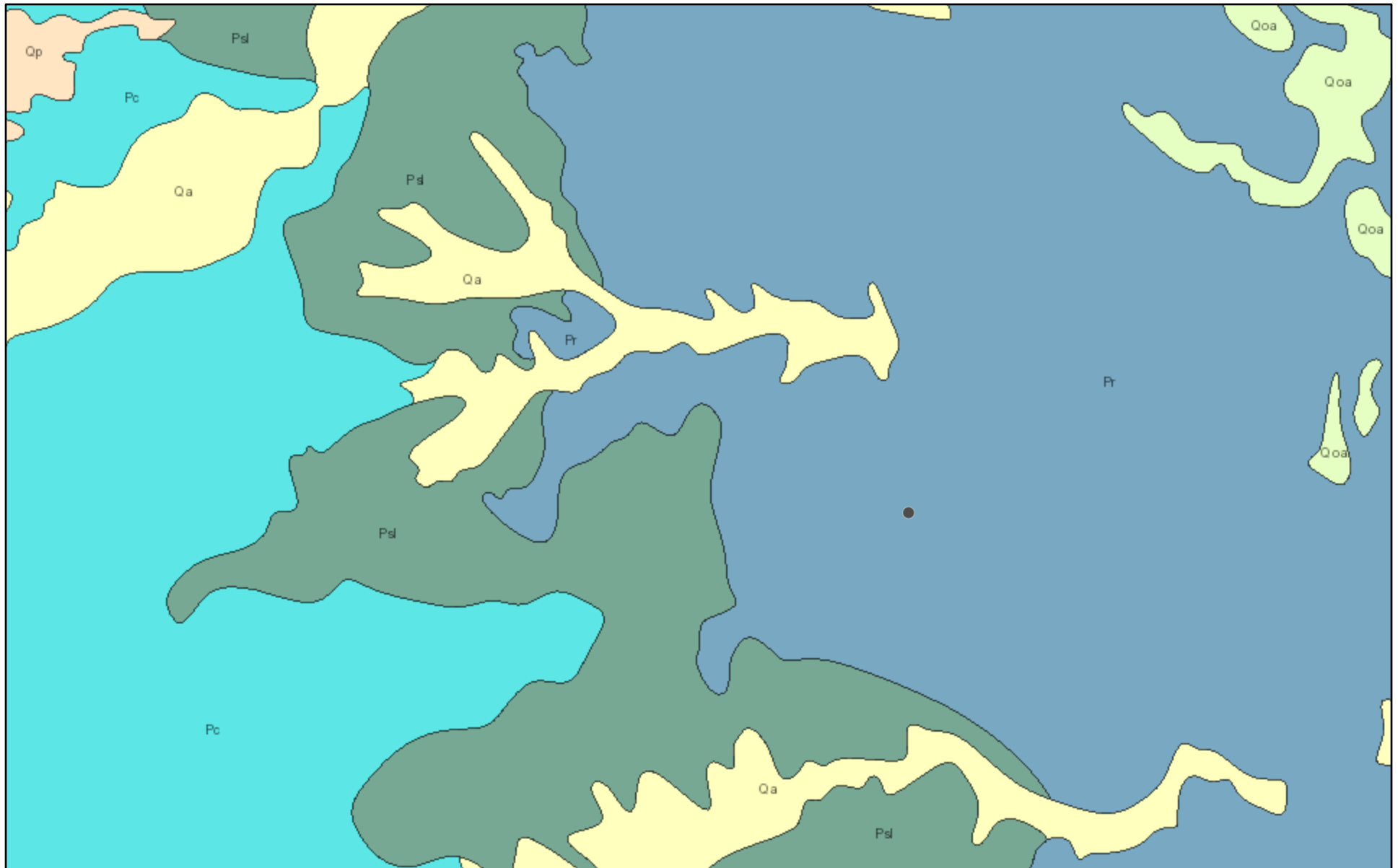
Hydric soil rating: No

Data Source Information

Soil Survey Area: Eddy Area, New Mexico

Survey Area Data: Version 20, Sep 3, 2024

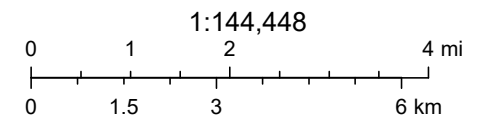
Atticus State 36N CTB



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Lithologic Units

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



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

ArcGIS Web AppBuilder

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

Karst Potential



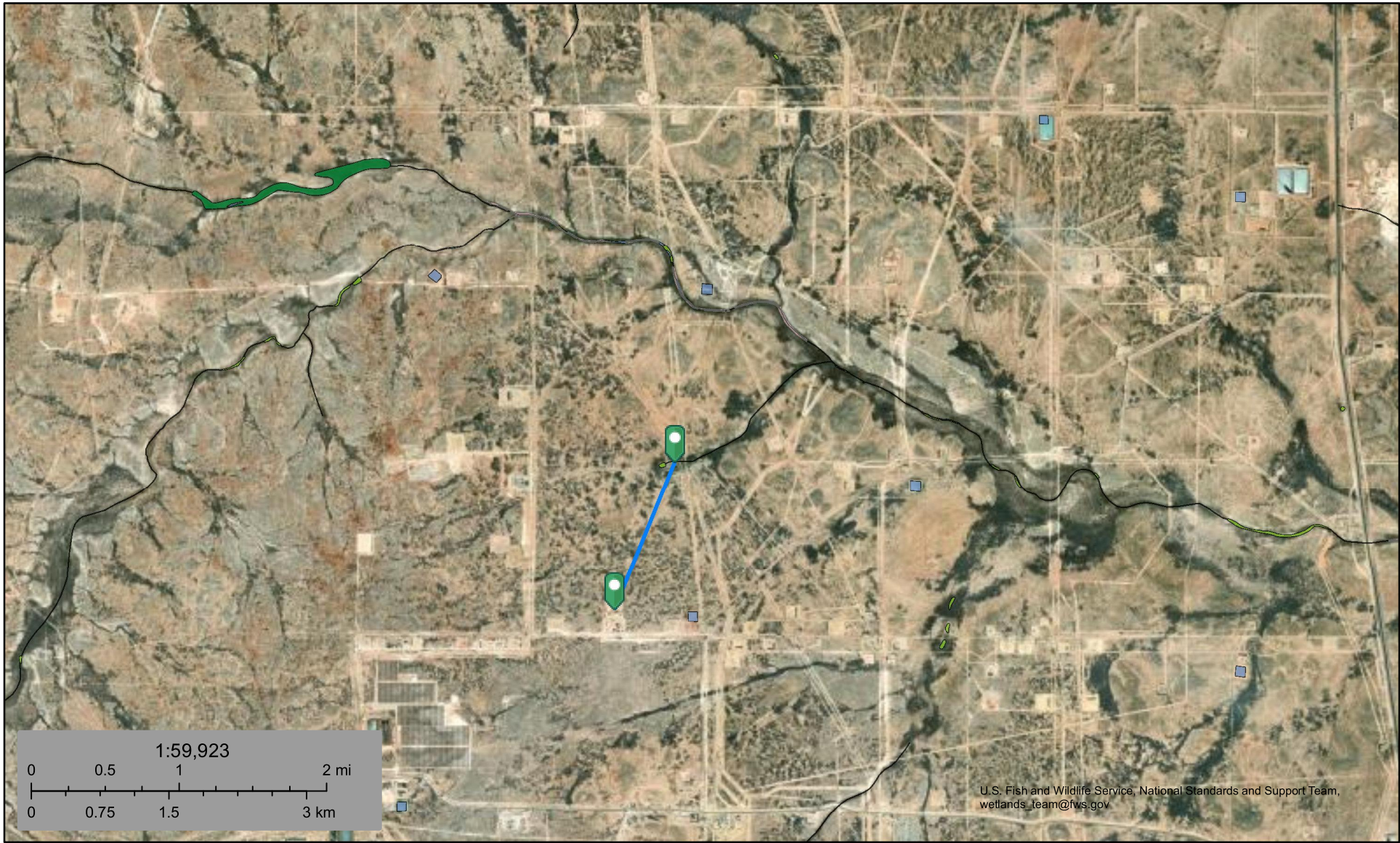
4/18/2025, 1:41:01 PM

◆ OSE Water PODs
Karst Occurrence Potential
Medium
High

1:18,056
0 0.13 0.25 0.5 mi
0 0.2 0.4 0.8 km







BLM, OCD, New Mexico Tech, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community, OCD

New Mexico Oil Conservation Division
NM OCD Oil and Gas Map, <http://nm-eminrd.maps.arcgis.com/apps/webappviewer/index.html?id=4d0172306164de29fd2fb9f8f35ca75>; New Mexico Oil Conservation Division



April 9, 2025

Wetlands

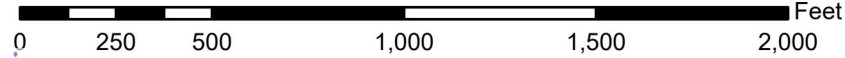
- | | | |
|--|---|--|
|  Estuarine and Marine Deepwater |  Freshwater Emergent Wetland |  Lake |
|  Estuarine and Marine Wetland |  Freshwater Forested/Shrub Wetland |  Other |
| |  Freshwater Pond |  Riverine |

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

National Flood Hazard Layer FIRMette



104°8'57"W 32°5'7"N



1:6,000

104°8'20"W 32°4'36"N

Basemap Imagery Source: USGS National Map 2023

Legend

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

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) <i>Zone A, V, A99</i>
		With BFE or Depth <i>Zone AE, AO, AH, VE, AR</i>
		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 <i>Zone X</i>
		Future Conditions 1% Annual Chance Flood Hazard <i>Zone X</i>
		Area with Reduced Flood Risk due to Levee. See Notes. <i>Zone X</i>
		Area with Flood Risk due to Levee <i>Zone X</i>
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard <i>Zone X</i>
		Effective LOMRs
GENERAL STRUCTURES		Area of Undetermined Flood Hazard <i>Zone D</i>
		Channel, Culvert, or Storm Sewer
OTHER FEATURES		Levee, Dike, or Floodwall
		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
		17.5
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
		Profile Baseline
		Hydrographic Feature
MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped

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 **4/10/2025 at 1:37 PM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

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

Released to Imaging: 9/15/2025 8:07:16 AM

Received by OCD: 9/15/2025 8:37:45 AM

Page 21 of 31

Attachment 3

Photographic Documentation

Site Photographs



Photo 1 View of south side secondary containment facing east.

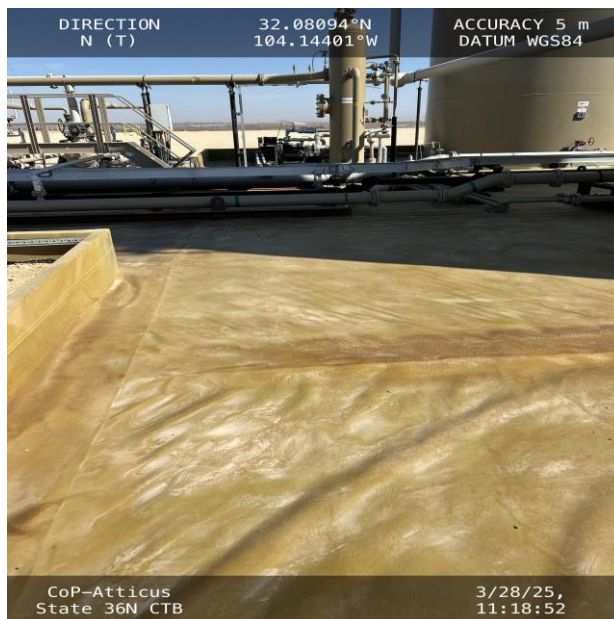


Photo 2 View of westside secondary containment facing north.

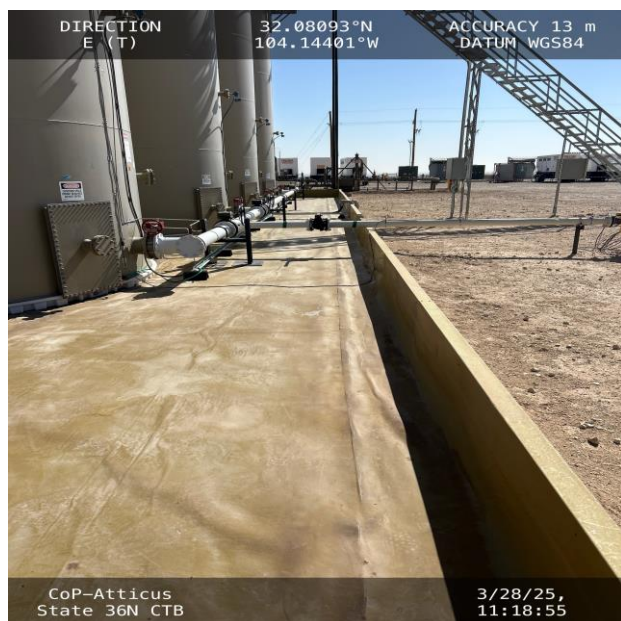


Photo 3 View of south side of secondary containment facing east.



Photo 4 View of south side secondary containment facing west.



Photo 5 View of east side secondary containment facing north.

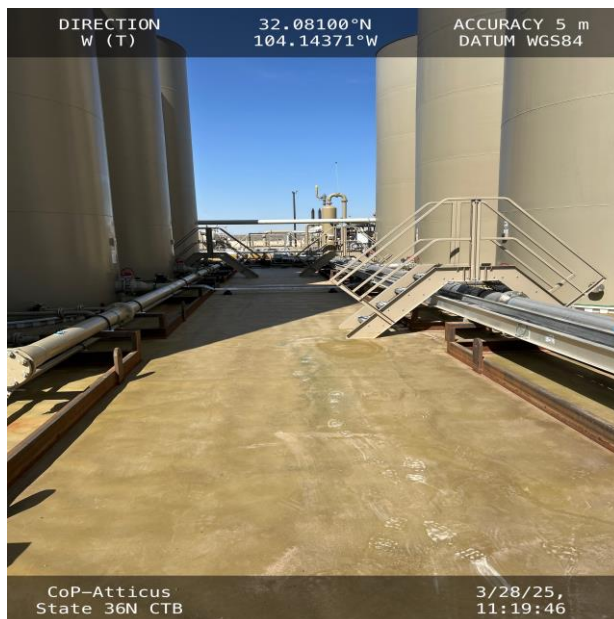


Photo 6 View of central portion of secondary containment.



Photo 7 View of east side secondary containment facing south.

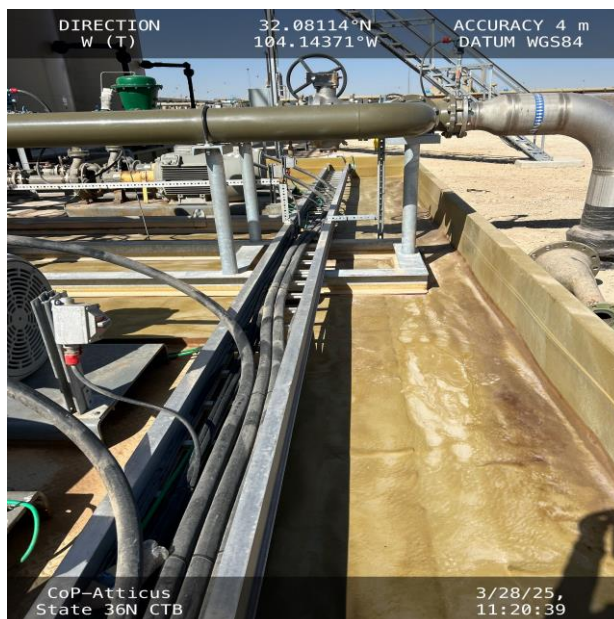


Photo 8 View of north side of secondary containment facing west.

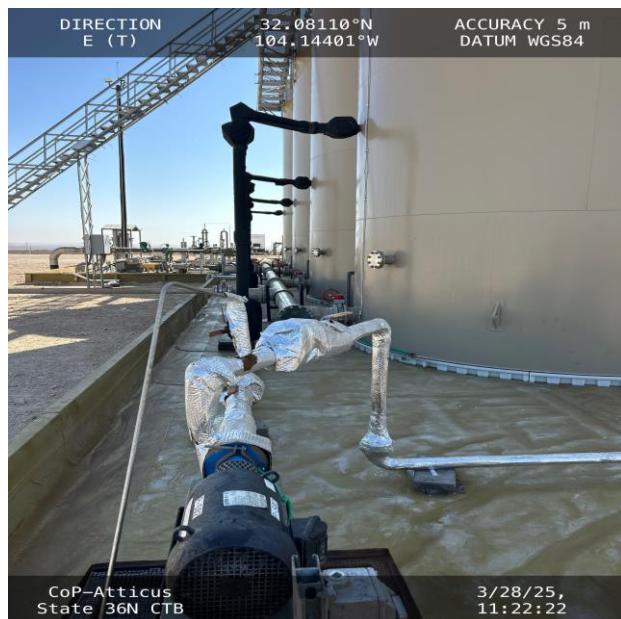


Photo 9 View of north side containment facing east.

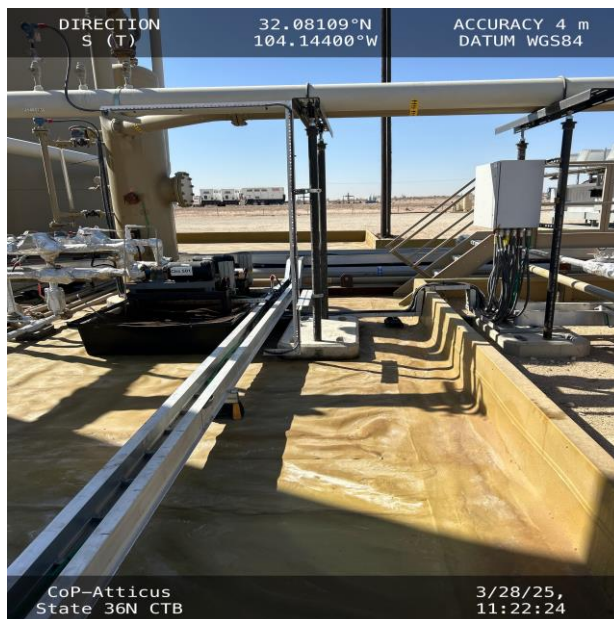


Photo 10 View of north side of secondary containment facing south.

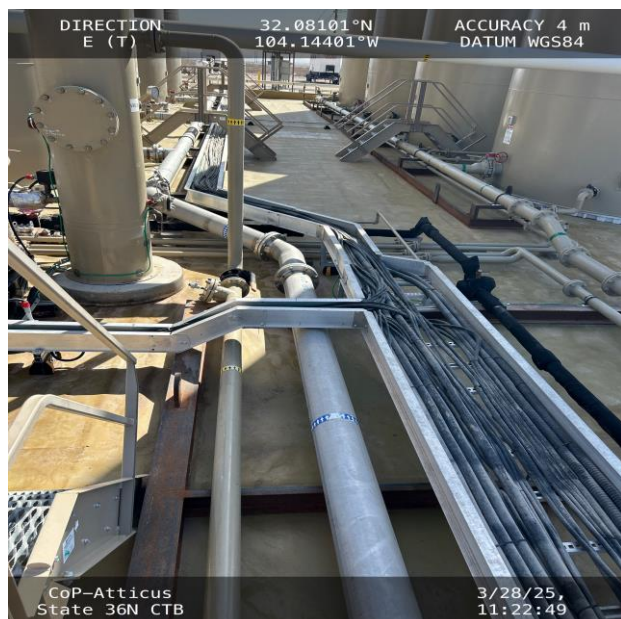


Photo 11 View of central portion of secondary containment towards east.

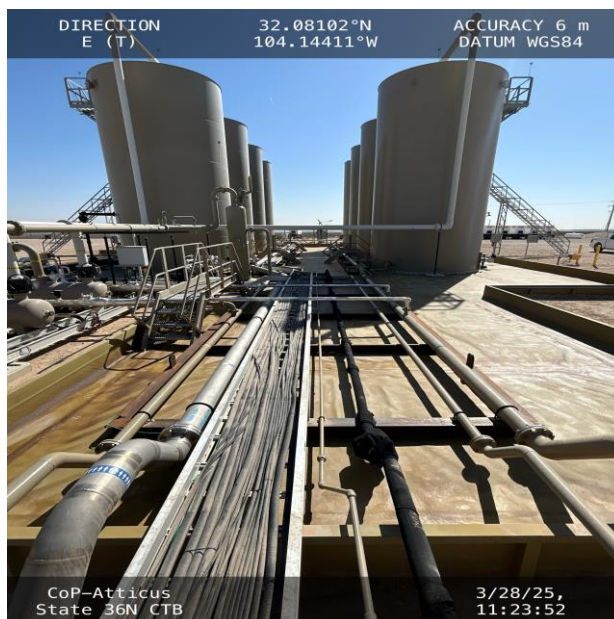


Photo 12 View of central portion of secondary containment facing east.

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 502166

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 502166
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2507433767
Incident Name	NAPP2507433767 ATTICUS STATE 36N CTB @ N-36-25S-27E
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received

Location of Release Source

Please answer all the questions in this group.

Site Name	Atticus State 36N CTB
Date Release Discovered	03/15/2025
Surface Owner	State

Incident Details

Please answer all the questions in this group.

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

Nature and Volume of Release

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

Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Corrosion Other (Specify) Produced Water Released: 361 BBL (Unknown Released Amount) Recovered: 360 BBL Lost: 1 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.

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Oil Conservation Division
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QUESTIONS, Page 2

Action 502166

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 502166
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.	

Initial Response

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

The source of the release has been stopped	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	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: 03/20/2025
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QUESTIONS, Page 3

Action 502166

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 502166
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Site Characterization	
<i>Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 51 and 75 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Between ½ and 1 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between ½ and 1 (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 ½ and 1 (mi.)
Any other fresh water well or spring	Between ½ and 1 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between ½ and 1 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Zero feet, overlying, or within area
Categorize the risk of this well / site being in a karst geology	High
A 100-year floodplain	Between 1 and 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
On what estimated date will the remediation commence	03/28/2025
On what date will (or did) the final sampling or liner inspection occur	03/28/2025
On what date will (or was) the remediation complete(d)	03/28/2025
What is the estimated surface area (in square feet) that will be remediated	0
What is the estimated volume (in cubic yards) that will be remediated	0
<i>These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.</i>	
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 4

Action 502166

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 502166
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Remediation Plan (continued)	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:	
<i>(Select all answers below that apply.)</i>	
Is (or was) there affected material present needing to be removed	Yes
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	Not answered.
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 09/03/2025
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 6

Action 502166

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 502166
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	445759
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	03/28/2025
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	7400

Remediation Closure Request	
<i>Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.</i>	
Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
What was the total surface area (in square feet) remediated	0
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	Liner inspected
<i>The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (in .pdf format) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.</i>	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.	
I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 09/03/2025

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CONDITIONS

Action 502166

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 502166
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
nvelez	Liner inspection approved, release resolved. Restoration complete.	9/15/2025