



September 3, 2025

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

**Re: Re-Vegetation Closure Report
ConocoPhillips Company (Heritage COG Operating, LLC)
Roy Batty Fed Com #3H Release
Unit Letter N, Section 11, Township 24 South, Range 33 East
Lea County, New Mexico
Incident ID# nRM1927338634**

Sir or Madam:

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips Company (ConocoPhillips) to assess re-vegetation progress at a Heritage COG Operating, LLC release following completion of remediation and reclamation actions. The former Roy Batty Fed Com #3H release footprint (Site) is located on privately-owned land at coordinates 32.226487°, -103.546319°.

BACKGROUND

According to the State of New Mexico C-141 Initial Report the release was discovered on August 29, 2019. Approximately 60 barrels of produced water was released to the lease road and pasture due to a corroded flowline. A vacuum truck was dispatched to remove all freestanding fluids, recovering around 40 barrels of produced water. The release occurred along the lease road impacting an area measuring approximately 629 feet by 5 feet and migrated north into the pasture impacting an area measuring approximately 89 feet by 26 feet. The New Mexico Oil Conservation Division (NMOCD) assigned the release the Incident ID nRM1927338634.

CLOSURE REPORT AND NMOCD REJECTION

Tetra Tech performed soil assessment activities at the release site on October 9, 2019. Based on the results of the soil assessment, soil remediation activities were performed at the site from December 19, 2019 to January 14, 2020. A *Closure Report* describing the site assessment and remedial activities was submitted to the NMOCD on April 27, 2020. The closure request was rejected by Robert Hamlet via email on Tuesday, June 23, 2020, with the following comments:

- *"When nearby wells are used to determine depth to groundwater, the wells should be no further than ½ mile away from the site, and data should be no more than 25 years old, and well construction information should be provided. If evidence of depth to ground water within a ½ mile radius of the site cannot be provided, impacted soils will need to meet Table 1 Closure Criteria for ground water at a depth of 50 feet or less.*
- *If you feel the depth to groundwater is >50', a shallow borehole can be drilled to 51' allowing for verification of the depth. If water is not visible after reaching bottom-hole and waiting 72 hours, the OCD will accept this as evidence. We would just need a copy of the driller's log."*

REVISED CLOSURE REQUEST AND NMOCD APPROVAL

An *Additional Site Characterization, Revised Closure Request, and Reclamation Report* dated March 6, 2024 was prepared by Tetra Tech on behalf of ConocoPhillips. The revised closure request provided a revised site characterization performed for the Site in response to the NMOCD comments on the 2020 closure report. The revised report also documented the reclamation activities performed at the Site in

Tetra Tech

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ConocoPhillips

accordance with 19.15.29.13 NMAC at the time of the remediation. Approximately 480 cubic yards of material were excavated during the remediation activities and transported offsite for proper disposal. All final confirmation sampling results were below the reclamation limits for all constituents. Figures 1-4 from the original closure report, illustrating the assessment sampling locations and remediation extents, are included as attachments in this report for reference.

Once acceptable confirmation sample results were received, the excavation was backfilled with clean material to pre-release grade. The soil cover included a top layer consisting of one foot of suitable material to establish vegetation at the Site. The revised closure request was approved by the NMOCD on April 17, 2024.

SITE RESTORATION AND RE-VEGETATION

Tetra Tech conducted a Site inspection on February 2, 2024 to monitor the progress of re-vegetation. At the time of the inspection, the remediated/reclaimed area south of the lease road (characterized by assessment sampling location AH-6 and confirmation sampling location Bottomhole-10) was fully revegetated to pre-disturbance levels. Photographic documentation from the February 2, 2024 Site inspection is included in Attachment A.

Adequate vegetation cover had not yet established in the remediated/reclaimed area north of the lease road (characterized by assessment sampling locations AH-1 and AH-2). Following the February 2, 2024 Site inspection, this area was reseeded with BLM Seed Mix #2 to aid in re-vegetation.

Another Site inspection was conducted on May 29, 2025 to assess the progress of re-vegetation in the remediated/reclaimed area north of the lease road. Documentation of the vegetation survey is presented in Attachment B.

Based on observations made during the Site inspection, uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent of pre-disturbance levels and a total percent plant cover of at least seventy percent of pre-disturbance levels, excluding noxious weeds, in accordance with 19.15.29.13 NMAC. Photographic documentation from the May 29, 2025 Site inspection is included in Attachment A.

CONCLUSION

Based on the results of the restoration, reclamation, and re-vegetation activities, ConocoPhillips respectfully requests approval of the re-vegetation associated with this incident. If you have any questions concerning the reclamation activities performed at the Site, please call me at (512) 739-7874.

Sincerely,

Tetra Tech, Inc.



Samantha K. Abbott, P.G.
Senior Project Manager



Lisbeth Chavira
Project Manager

cc:

Mr. Jacob Laird, GPBU - ConocoPhillips

Re-Vegetation Closure Report
September 3, 2025

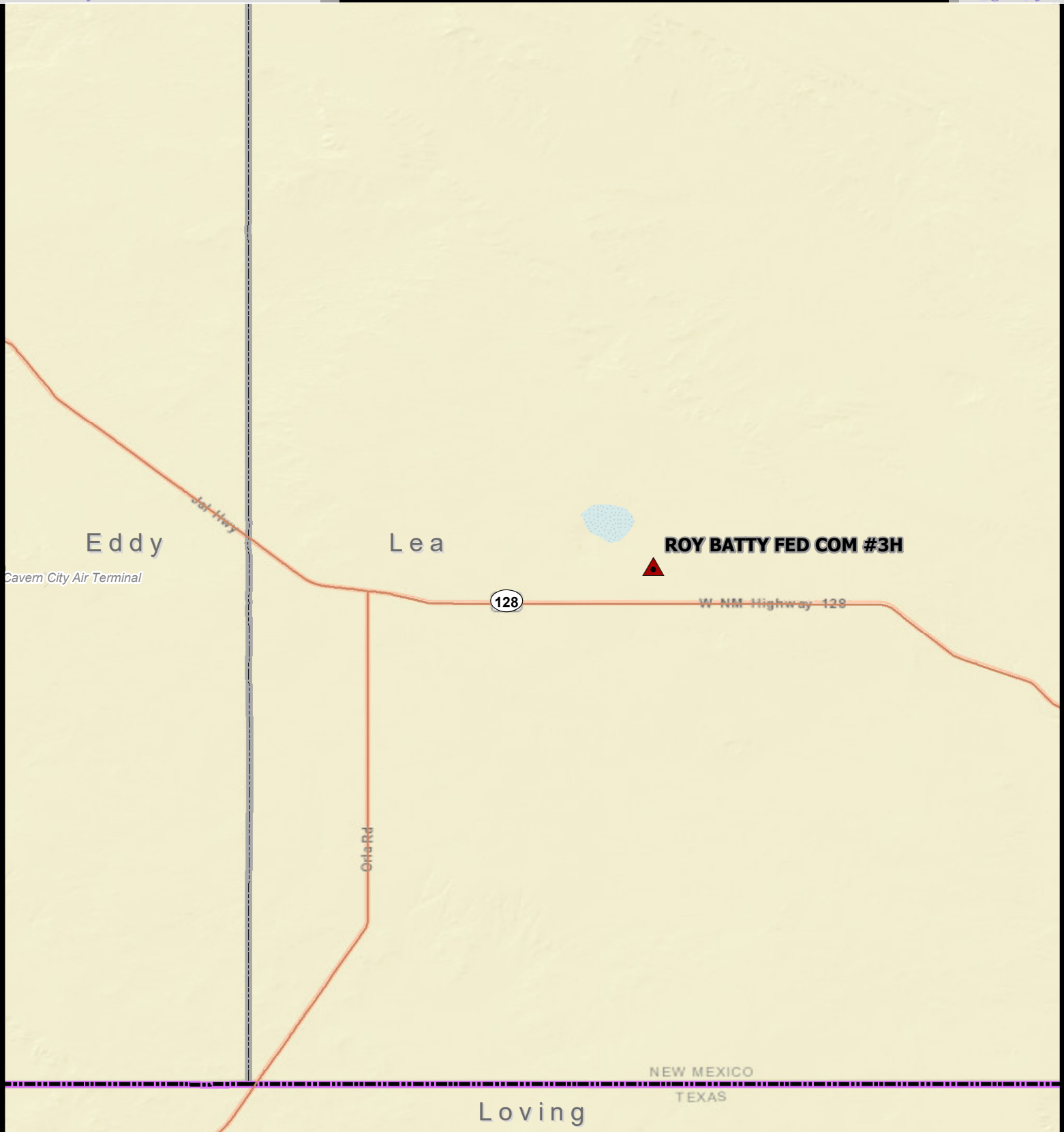
ConocoPhillips

LIST OF ATTACHMENTS

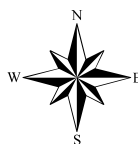
Figure 1 – Overview Map
Figure 2 – Topographic Map
Figure 3 – Spill Assessment Map
Figure 4 – Excavation Area & Depth Map

Attachment A – Photographic Documentation
Attachment B – Vegetation Survey (May 29, 2025)

FIGURES



SITE LOCATION



0 10,416.5 20,833

Approximate Scale in Feet



STATE LOCATOR MAP

OVERVIEW MAP

ROY BATTY FED COM #3

Property Located at coordinates 32.2263°, -103.5461°
LEA COUNTY, NEW MEXICO



TETRA TECH
901 W Wall St Ste. 100,
Midland, TX 79701
(432) 682-4559

Project #: 212C-MD-01962
Date: 01-15-2020
Drawn By: MLM

FIGURE
1



SITE LOCATION



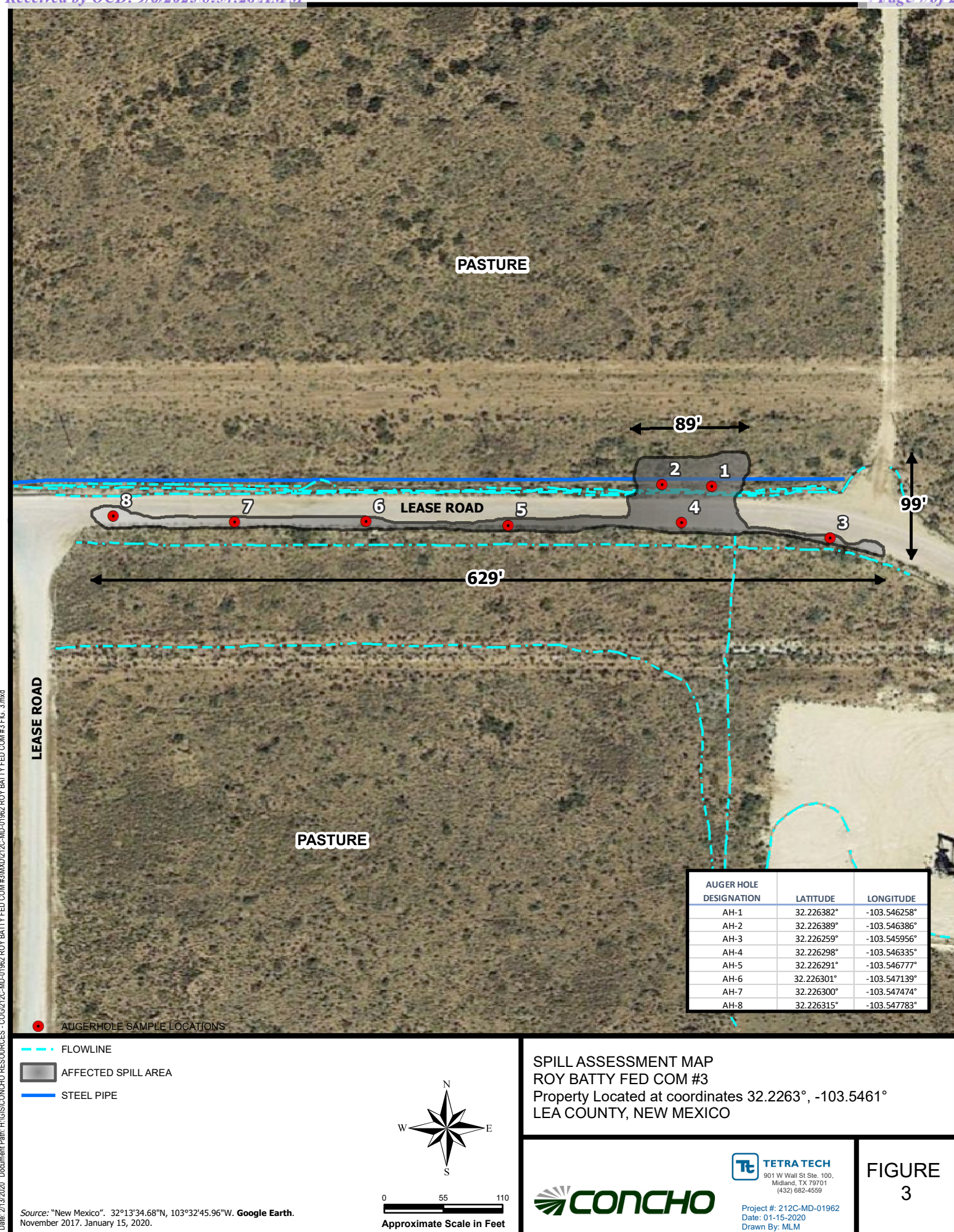
0 1,000 2,000
Approximate Scale in Feet

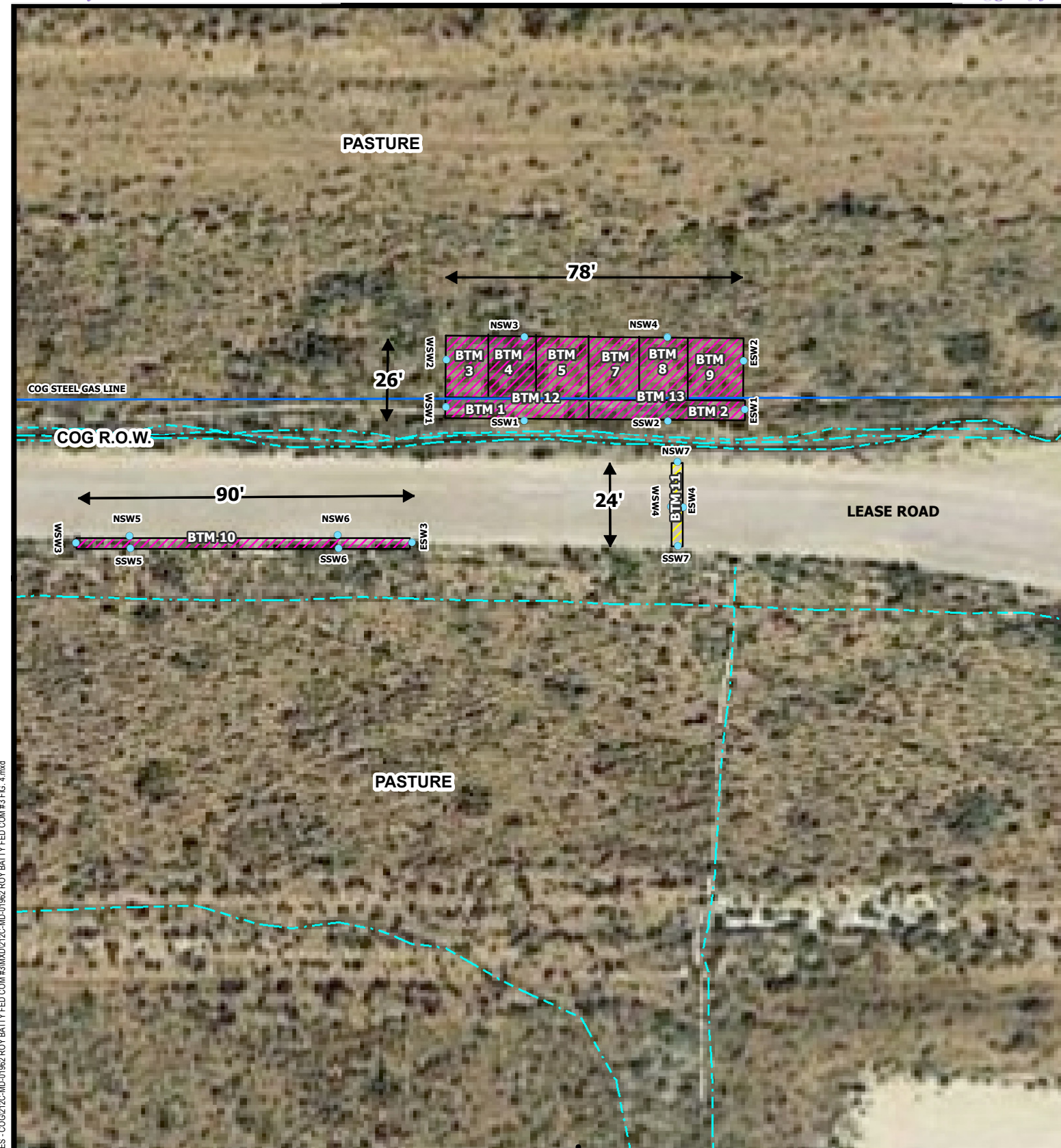
TOPOGRAPHIC MAP
ROY BATTY FED COM #3
Property Located at coordinates 32.2263°, -103.5461°
LEA COUNTY, NEW MEXICO



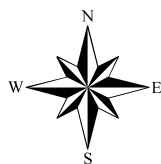
Project #: 212C-MD-01962
Date: 01-15-2020
Drawn By: MLM

FIGURE
2





- BTM** BOTTOM HOLES
- SIDE WALL SAMPLE LOCATIONS
- STEEL PIPE
- 6" EXCAVATED DEPTH
- 4.5' EXCAVATED DEPTH
- - - FLOWLINE



0 20 40
Approximate Scale in Feet

Source: "New Mexico". 32°13'34.68"N, 103°32'45.96"W. Google Earth.
November 2017, January 15, 2020.

EXCAVATION AREA & DEPTH MAP
ROY BATTY FED COM #3
 Property Located at coordinates 32.2263°, -103.5461°
 LEA COUNTY, NEW MEXICO



TETRA TECH
 901 W Wall St Ste. 100,
 Midland, TX 79701
 (432) 682-4559
 Project #: 212C-MD-01962
 Date: 04-27-2020
 Drawn By: MLM

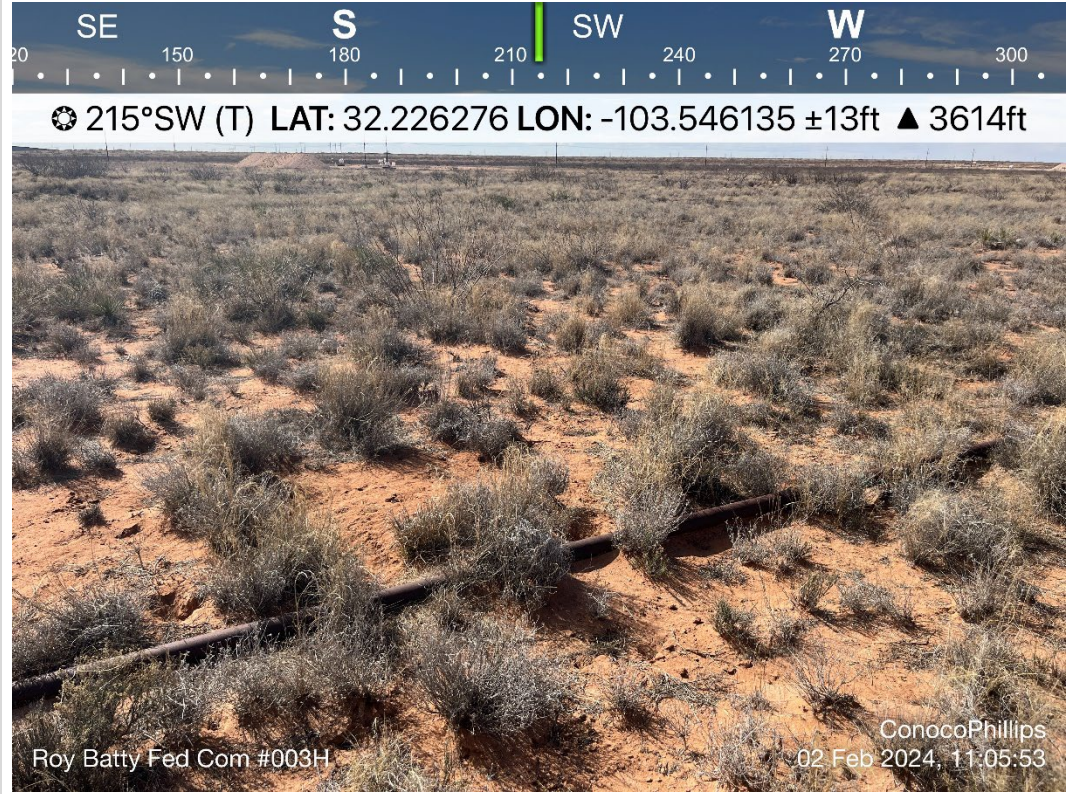
FIGURE
4

ATTACHMENT A

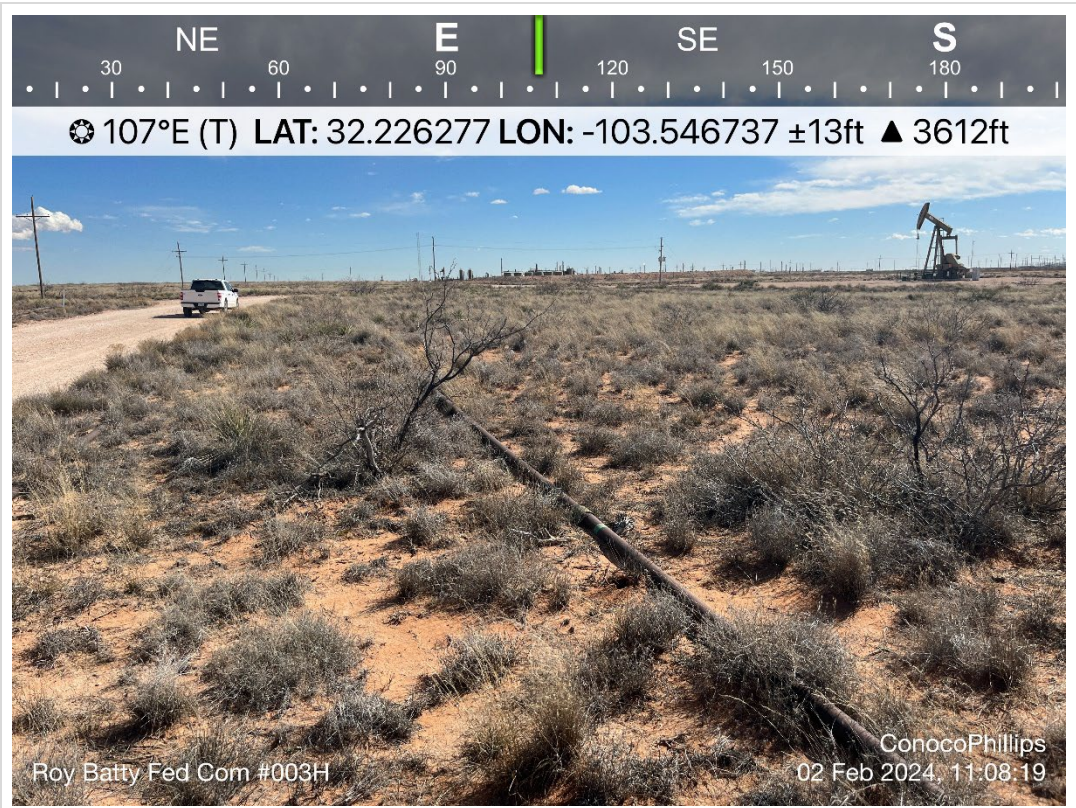
Photographic Documentation



TETRA TECH, INC. PROJECT NO. 212C-MD-03244	DESCRIPTION	View north of former release area. Surface and steel polyline.	1
	SITE NAME	Roy Batty Federal Com #003H Release	2/2/2024



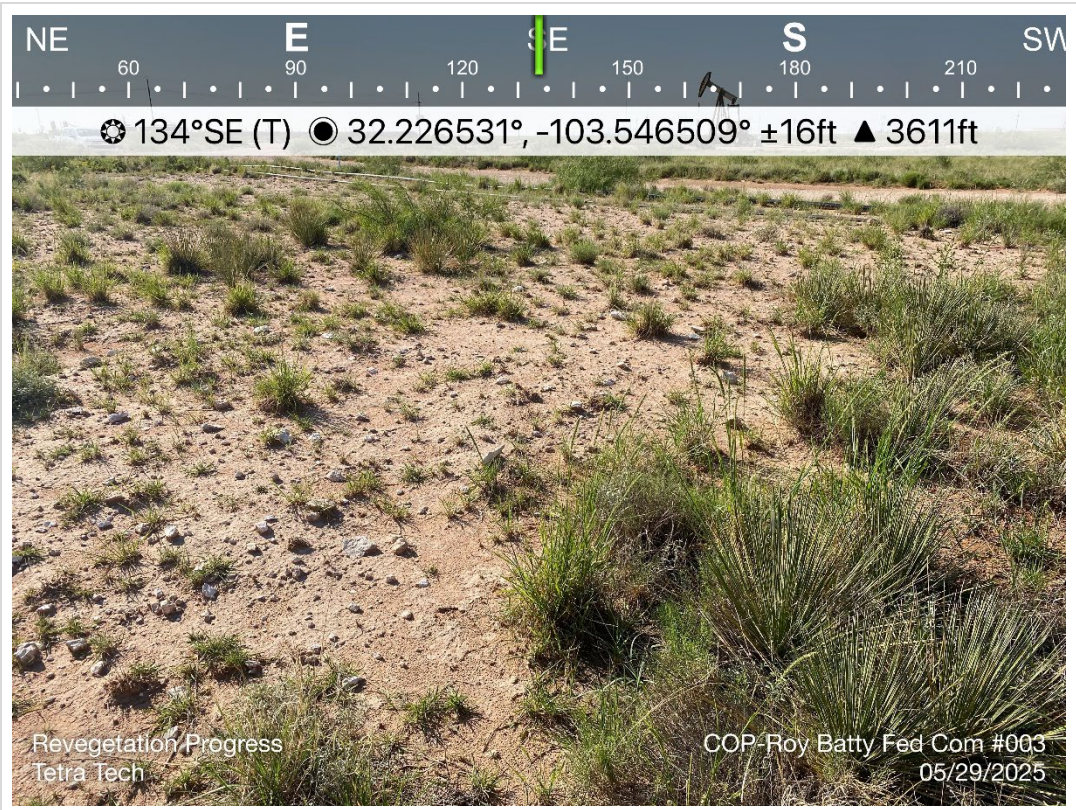
TETRA TECH, INC. PROJECT NO. 212C-MD-03244	DESCRIPTION	View south-southwest of former release area and steel polyline.	2
	SITE NAME	Roy Batty Federal Com #003H Release	2/2/2024



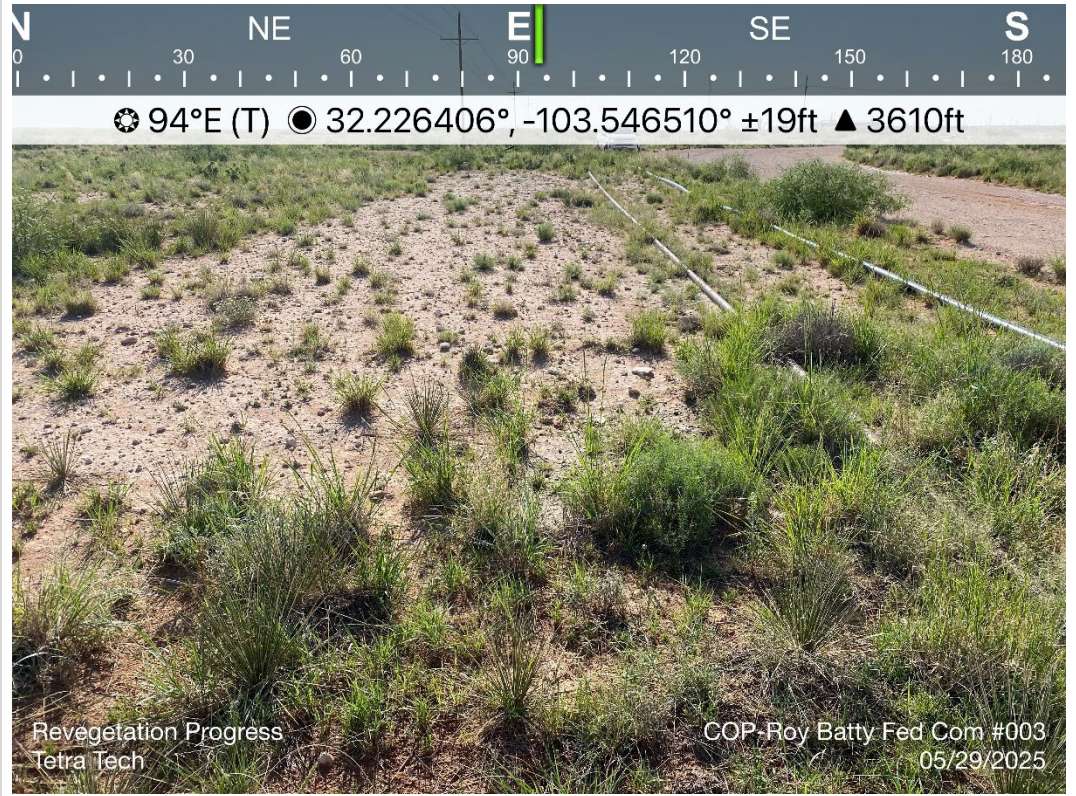
TETRA TECH, INC. PROJECT NO. 212C-MD-03244	DESCRIPTION	View east-southeast of former release area and surface steel line near wellhead.	3
	SITE NAME	Roy Batty Federal Com #003H Release	2/2/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03244	DESCRIPTION	View south of former release area. Re-vegetation progress in reclamation area north of lease road.	4
	SITE NAME	Roy Batty Federal Com #003H Release	5/29/2025



TETRA TECH, INC. PROJECT NO. 212C-MD-03244	DESCRIPTION	View southeast of former release area. Re-vegetation progress in reclamation area north of lease road.	5
	SITE NAME	Roy Batty Federal Com #003H Release	5/29/2025



TETRA TECH, INC. PROJECT NO. 212C-MD-03244	DESCRIPTION	View east of former release area. Re-vegetation progress in reclamation area north of lease road.	6
	SITE NAME	Roy Batty Federal Com #003H Release	5/29/2025

ATTACHMENT B

Vegetation Survey

VEGETATION DATA FORM

Project: CoP- Roy Batty Fed Com 003 Revegetation	County: Lea County, NM
Date: 5/29/2025	Sample Point: V1A
GENERAL HABITAT TYPE: Mesquite Upland Scrub	

DOMINANT VEGETATION		
Tree Stratum (Plot Size: 30')	% Cover	Height (ft.)
1. N/A		
2.		
3.		
4.		
5.		
Total Cover	0%	
Shrub Stratum (Plot Size: 15')		
1. Neltuma glandulosa	10%	0.5 - 2.0'
2. Yucca elata	10%	0.5 - 1.5'
3. Gutierrezia sarothrae	3%	0.5 - 1.0'
4. Quercus havardii	3%	0.5 - 2.0'
5.		
6.		
7.		
Total Cover	26%	
Herb Stratum (Plot Size: 5')		
1. Setaria vulpiseta	15%	0.25 - 1.0'
2. Croton texensis	5%	0.25 - 1.0'
3. Hilaria mutica	5%	0.25 - 1.0'
4. Aristida purpurea	3%	0.25 - 1.0'
5.		
6.		
7.		
Total Cover	28%	
Woody Vine Stratum (Plot Size: 30')		
1. N/A		
2.		
Total Cover	0%	

Definitions of Habitat Type:

Creosote Bush, Mixed Desert, and Thorn Scrub – Creosote bush dominated scrubland with mixed shrub species; grasses are sparse.

Mesquite Upland Scrub – Mesquite dominated shrubland, often mixed with acacia species and juniper; grasses are sparse.

Sand Sagebrush Steppe – Sand sagebrush dominated shrubland (sagebrush and/or shinnery), often associated with dune systems; coverage can be sparse to moderately dense.

Mixed Desert Shrub Steppe – Dry, open grasslands with open to moderately dense shrub coverage.

Shortgrass Prairie – Shortgrass dominated grasslands that are extremely drought- and grazing-tolerant, often characterized by blue grama/buffalo grass.

Mixed Desert Riparian Woodland/Shrubland – Woodlands and shrublands that occur along low elevation rivers and streams, often in desert valleys. Frequently characterized by cottonwood, willow, alder and various rush, sedge and grass species.

Definitions of Vegetation Strata:

Tree – Woody plants, excluding woody vines, approximately 20 ft (6 m) or more in height and 3 in. (7.6 cm) or larger in diameter at breast height (DBH).

Shrub – Woody plants, excluding woody vines, approximately 3 to 20 ft (1 to 6 m) in height.

Herb – All herbaceous (non-woody) plants, including herbaceous vines, regardless of size. Include woody plants, except woody vines, less than approximately 3 ft. (1 m) in height.

Woody vine – All woody vines, regardless of height.

Notes:

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 503636

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 503636
	Action Type: [C-141] Revegetation Report C-141 (C-141-v-Revegetation)

QUESTIONS

Prerequisites	
Incident ID (n#)	nRM1927338634
Incident Name	NRM1927338634 ROY BATTY FEDERAL COM #003H @ FDHR1915541470
Incident Type	Produced Water Release
Incident Status	Re-vegetation Report Received
Incident Facility	[fDHR1915541470] ROY BATTY FEDERAL COM #001H FLOWLINE

Location of Release Source

Please answer all the questions in this group.

Site Name	ROY BATTY FEDERAL COM #003H
Date Release Discovered	08/29/2019
Surface Owner	Private

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 - Injection Produced Water Released: 60 BBL Recovered: 40 BBL Lost: 20 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.

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QUESTIONS, Page 2

Action 503636

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 503636
	Action Type: [C-141] Revegetation Report C-141 (C-141-v-Revegetation)

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: 09/08/2025
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QUESTIONS, Page 3

Action 503636

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 503636
	Action Type: [C-141] Revegetation Report C-141 (C-141-v-Revegetation)

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	Attached Document
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Greater than 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Greater than 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Greater than 5 (mi.)
Any other fresh water well or spring	Greater than 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Greater than 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	None
A 100-year floodplain	Greater than 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	Yes

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	No
Soil Contamination Sampling: (Provide the highest observable value for each, in milligrams per kilograms.)	
Chloride (EPA 300.0 or SM4500 Cl B)	5390
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	0
GRO+DRO (EPA SW-846 Method 8015M)	0
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	12/19/2019
On what date will (or did) the final sampling or liner inspection occur	01/13/2020
On what date will (or was) the remediation complete(d)	01/14/2020
What is the estimated surface area (in square feet) that will be reclaimed	2270
What is the estimated volume (in cubic yards) that will be reclaimed	2270
What is the estimated surface area (in square feet) that will be remediated	480
What is the estimated volume (in cubic yards) that will be remediated	2270
<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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Action 503636

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 503636
	Action Type: [C-141] Revegetation Report C-141 (C-141-v-Revegetation)

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>	
(Ex Situ) Excavation and off-site disposal (i.e. dig and haul, hydrovac, etc.)	Yes
Which OCD approved facility will be used for off-site disposal	fAPP2203859468 Roy Batty Fed Com CTB Battery
OR which OCD approved well (API) will be used for off-site disposal	Not answered.
OR is the off-site disposal site, to be used, out-of-state	No
OR is the off-site disposal site, to be used, an NMED facility	No
(Ex Situ) Excavation and on-site 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: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 09/08/2025
<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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Action 503636

QUESTIONS (continued)

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	Action Number: 503636
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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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QUESTIONS, Page 6

Action 503636

QUESTIONS (continued)

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

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	321091
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	12/19/2019
What was the (estimated) number of samples that were to be gathered	13
What was the sampling surface area in square feet	200

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	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	6400
What was the total volume (cubic yards) remediated	480
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	0
What was the total volume (in cubic yards) reclaimed	0
Summarize any additional remediation activities not included by answers (above)	Spill off pad, dig and haul remediation, will reclaim/revegetate during P/A.
<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: 09/08/2025

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

General Information
Phone: (505) 629-6116

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

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

QUESTIONS, Page 7

Action 503636

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 503636
	Action Type: [C-141] Revegetation Report C-141 (C-141-v-Revegetation)

QUESTIONS

Reclamation Report	
<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	2270
What was the total volume of replacement material (in cubic yards) for this site	480
<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 reseedling commence(d)	05/01/2024
Summarize any additional reclamation activities not included by answers (above)	N/A
<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 reseedling 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: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 09/08/2025

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QUESTIONS, Page 8

Action 503636

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 503636
	Action Type: [C-141] Revegetation Report C-141 (C-141-v-Revegetation)

QUESTIONS

Revegetation Report	
<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	Yes
What was the total revegetation surface area (in square feet) for this site	2270
<i>Per Paragraph (2) of Subsection D of 19.15.29.13 NMAC the responsible party must reseed disturbed area in the first favorable growing season following closure of the site.</i>	
On what date did the reseeded commence	05/01/2024
On what date was the vegetative cover inspected	05/29/2025
What was the life form ratio compared to pre-disturbance levels	50
What was the total percent plant cover compared to pre-disturbance levels	70
Summarize any additional revegetation activities not included by answers (above)	Total percent plant cover at time of inspection was 54% based on the vegetation data form included in the report.
<i>The responsible party must attach information demonstrating they have complied with all applicable re-vegetation 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 life form ratio and percent plant cover sampling diagrams or other relevant field notes, photographs of re-vegetated areas, and a narrative of the re-vegetation 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: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 09/08/2025
<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 503636

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 503636
	Action Type: [C-141] Revegetation Report C-141 (C-141-v-Revegetation)

CONDITIONS

Created By	Condition	Condition Date
scwells	None	9/17/2025