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

Our ref.: 12686213-NMOCD-1

February 3, 2026

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

Closure Report
COG Operating, LLC
Way South State 31B CTB-RT Battery
Unit Letter E, Section 31, T26S, R28E
GPS: 32.00215, -104.13243
Eddy County, New Mexico

1. Introduction

GHD Services Inc. (GHD), on behalf of COG Operating, LLC (COG), has prepared this *Closure Report* to document site assessment activities at Way South State 31B CTB-RT 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, COG is submitting this *Closure Report*, describing Site assessment activities that have occurred and requesting closure for Incident Number nAPP2530734787.

2. Site Description and Release Summary

The Site is in Unit E, Section 31, Township 26 South, Range 28 East, in Eddy County, New Mexico (32.00215 N, -104.13243 W) and is associated with oil and gas exploration and production operations on State Land. On October 23, 2025, a corroded dump line caused the release of approximately 5 barrels (bbls) of produced water fluids to be released into the lined secondary containment. A vacuum truck was dispatched to the Site to recover free-standing fluids; 5 bbls of released produced water was recovered from within the lined containment. The release was reported to the New Mexico Oil Conservation Division (NMOCD) on November 3, 2025, and was subsequently assigned Incident Number nAPP2530734787.

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, 0 to 3 percent slopes, well-drained. The Site is located within an area of high karst potential.

Depth to groundwater at the Site is estimated to be 33 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 C-4466 POD1 located approximately 1.69 miles northeast of the Site. The well was completed to a depth of 96 ft bgs on September 2, 2020, with water struck at 33 ft bgs. A copy of the well referenced record is included in **Attachment A**.

The Site is not within 300 feet of any continuously flowing watercourse or any other significant watercourse. There are no lakebeds, sinkholes or playa lakes within 200 feet of the Site. The closest playa is approximately 0.67 miles north of the Site, and the nearest riverine wetland is 0.96 miles to the east. There are no permanent residences, schools, hospitals, institutions or churches within 300 feet of the Site. The closest residence is greater than 5 miles from the Site. The nearest fresh water well utilized for livestock watering is 2.03 miles north of the Site. There are no subsurface mines or 100-year floodplains within 300 feet of the Site. The location of the Site is depicted on **Figure 1**. A detailed map of the Site is provided on **Figure 2**. The Site Characterization Documentation is included in **Attachment B**.

Based on the results of the Site Characterization desktop review, 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	100	600

Notes:
--- = not defined.
mg/kg = milligrams per kilogram.
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 December 1, 2025. A liner integrity inspection was performed on December 5, 2025. The liner was visually inspected and no rips, tears, holes, or damage in the liner was observed. The liner was determined to be intact with no integrity issues. Photographic documentation of the liner inspection is presented in **Attachment C**.

5. Closure Request

Based on the liner inspection and assessment activities at the Site, COG Operating, LLC respectfully requests that no further actions be required, and requests closure for Incident Number nAPP2530734787 be granted.

Should you have any questions or require further information regarding this report, please do not hesitate to contact the undersigned.

Regards,

Kayla Taylor
Senior Project Manager

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

Scott Foord
Project Director

+1 281 725-7477
william.foord@ghd.com

KT/jlf/1/S4

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

Paper Size ANSI A

0 1,000 2,000

Feet

Map Projection: Transverse Mercator
Horizontal Datum: NAD 1983 2011
Grid: NAD 1983 2011 StatePlane New Mexico East FIPS 3001 Ft US

N

GHD

COG OPERATING, LLC
EDDY COUNTY, NEW MEXICO
WAY SOUTH STATE 31B CTB-RT BATTERY
NAPP2530734787

Project No. 12686213
Revision No. -
Date Dec 17, 2025

SITE LOCATION MAP

FIGURE 1

\GIS\PROJECTS\12686000s\12686213\GIS\Maps\Deliverables\202512_nAPP2530734787\12686213_nAPP2530734787.aprx
Print date: 17 Dec 2025 - 15:27

Data source: ESRI Topographic Basemap, Accessed 2025; ESRI Data & Maps 2008 Data Distribution Application (DDA); GHD

Paper Size ANSI A

0 50 100

Feet

Map Projection: Transverse Mercator
Horizontal Datum: NAD 1983 2011
Grid: NAD 1983 2011 StatePlane New Mexico East FIPS 3001 Ft US

N

GHD

COG OPERATING, LLC
EDDY COUNTY, NEW MEXICO
WAY SOUTH STATE 31B CTB-RT BATTERY
NAPP2530734787

Project No. 12686213
Revision No. -
Date Feb 3, 2026

SITE DETAILS MAP

FIGURE 2

O:\GIS\PROJECTS\12686000s\12686213\GIS\Maps\Deliverables\202512_nAPP2530734787\12686213_nAPP2530734787.aprx
Print date: 03 Feb 2026 - 15:52

Data source: ESRI Topographic Basemap, Accessed 2026; ESRI Data & Maps 2008 Data Distribution Application (DDA); GHD.

Attachment A

Referenced Well Records

WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

www.ose.state.nm.us

1. GENERAL AND WELL LOCATION

OSE POD NO. (WELL NO.)	WELL TAG ID NO.	OSE FILE NO(S).
C-4466 POD 1 (S.P. 01)		C-4466

WELL OWNER NAME(S)	PHONE (OPTIONAL)
Dept of Geological Sciences, University of Texas at El Paso	575-405-7734

WELL OWNER MAILING ADDRESS	CITY	STATE	ZIP
718 Prospect St.	El Paso	TX	79902

WELL LOCATION (FROM GPS)		DEGREES	MINUTES	SECONDS	
	LATITUDE	32	00	51.10	N
	LONGITUDE	104	06	25.58	W

* 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

SW1/4,SW1/4,NE1/4 Sec 29 T26S R28E NMPM

2. DRILLING & CASING INFORMATION

LICENSE NO.	NAME OF LICENSED DRILLER	NAME OF WELL DRILLING COMPANY
WD-1456	John W. White	White Drilling Company, Inc.

DRILLING STARTED	DRILLING ENDED	DEPTH OF COMPLETED WELL (FT)	BORE HOLE DEPTH (FT)	DEPTH WATER FIRST ENCOUNTERED (FT)
09/01/2020	09/02/2020	96		33

COMPLETED WELL IS: ☐ ARTESIAN ☐ DRY HOLE ☑ SHALLOW (UNCONFINED)

STATIC WATER LEVEL IN COMPLETED WELL (FT): 31

DRILLING FLUID: ☑ AIR ☐ MUD ADDITIVES – SPECIFY:

DRILLING METHOD: ☑ ROTARY ☐ HAMMER ☐ CABLE TOOL ☐ OTHER – SPECIFY:

DEPTH (feet bgl) FROM	DEPTH (feet bgl) TO	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)	SLOT SIZE (inches)

3. ANNULAR MATERIAL

DEPTH (feet bgl) FROM	DEPTH (feet bgl) TO	BORE HOLE DIAM. (inches)	LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL	AMOUNT (cubic feet)	METHOD OF PLACEMENT

FOR OSE INTERNAL USE

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

FILE NO. C-4466	POD NO. 1	TRN NO. 676853	
LOCATION 323 T26S R28E Sec 29		WELL TAG ID NO. NA	PAGE 1 OF 2

4. HYDROGEOLOGIC LOG OF WELL

DEPTH (feet bgl) FROM	DEPTH (feet bgl) TO	THICKNESS (feet)	COLOR AND TYPE OF MATERIAL ENCOUNTERED - INCLUDE WATER-BEARING CAVITIES OR FRACTURE ZONES **(attach supplemental sheets to fully describe all units)**	WATER BEARING? (YES / NO)	ESTIMATED YIELD FOR WATER-BEARING ZONES (gpm)
0.0	4.0	4.0	Brown silty clayey sand w/gravel	Y ✓N	
4.0	16.0	12.0	Brown sandy clay	Y ✓N	
16.0	26.0	10.0	Brown sandstone	Y ✓N	
26.0	27.0	1.0	Gravel/sandstone streaks	Y ✓N	
27.0	33.0	6.0	Yellow brown clayey sand	Y ✓N	
33.0	35.0	2.0	Gravel w/sand	✓Y N	
35.0	37.0	2.0	Red brown clayey sand w/sandstone mix	✓Y N	
37.0	42.0	5.0	Tan sandstone	✓Y N	
42.0	54.0	12.0	Brown silty sand/sandstone	✓Y N	
54.0	65.0	11.0	Brown and red/tan sandstone mixed	✓Y N	
65.0	67.0	2.0	Gray brown sandstone	✓Y N	
67.0	74.0	7.0	Gray brown sandstone w/gyp mixed	✓Y N	
				Y N	
				Y N	
				Y N	
				Y N	
				Y N	
				Y N	
				Y N	
				Y N	

METHOD USED TO ESTIMATE YIELD OF WATER-BEARING STRATA:

☐ PUMP ☐ AIR LIFT ☐ BAILER ☐ OTHER – SPECIFY:

TOTAL ESTIMATED WELL YIELD (gpm): 0.00

5. TEST; RIG SUPERVISION

WELL TEST — TEST RESULTS - ATTACH A COPY OF DATA COLLECTED DURING WELL TESTING, INCLUDING DISCHARGE METHOD, START TIME, END TIME, AND A TABLE SHOWING DISCHARGE AND DRAWDOWN OVER THE TESTING PERIOD.

MISCELLANEOUS INFORMATION:

PRINT NAME(S) OF DRILL RIG SUPERVISOR(S) THAT PROVIDED ONSITE SUPERVISION OF WELL CONSTRUCTION OTHER THAN LICENSEE:

William B. Atkins

6. SIGNATURE

BY SIGNING BELOW, I CERTIFY THAT TO THE BEST OF MY KNOWLEDGE AND BELIEF, THE FOREGOING IS A TRUE AND CORRECT RECORD OF THE ABOVE DESCRIBED WELL. I ALSO CERTIFY THAT THE WELL TAG, IF REQUIRED, HAS BEEN INSTALLED AND THAT THIS WELL RECORD WILL ALSO BE FILED WITH THE PERMIT HOLDER WITHIN 30 DAYS AFTER THE COMPLETION OF WELL DRILLING.

SIGNATURE OF DRILLER / PRINT SIGNEE NAME

10/6/2020

DATE

FOR OSE INTERNAL USE — WR-20 WELL RECORD & LOG (Version 04/30/2019)

FILE NO. C-4466	POD NO. 1	TRN NO. 676853	
LOCATION 323 T26S R28E Sec 29		WELL TAG ID NO. NA	PAGE 2 OF 2

Attachment B

Site Characterization Documentation

Soil Map—Eddy Area, New Mexico
(Way South Sate 31B CTB-RT Battery)

Map Scale: 1:1,220 if printed on A portrait (8.5" x 11") sheet.

N

Meters
0 15 30 60 90

Feet
0 50 100 200 300

Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 13N WGS84

Soil Map—Eddy Area, New Mexico
(Way South Sate 31B CTB-RT Battery)

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 21, Sep 9, 2025

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
RM	Reeves-Reagan loams, 0 to 3 percent slopes	6.4	100.0%
Totals for Area of Interest		**6.4**	**100.0%**

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: Hills, plains, ridges
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)

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: Alluvial fans, fan remnants
Landform position (three-dimensional): Rise
Down-slope shape: Linear, convex
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

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 21, Sep 9, 2025

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: Hills, plains, ridges
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)

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: Alluvial fans, fan remnants
Landform position (three-dimensional): Rise
Down-slope shape: Linear, convex
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

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 21, Sep 9, 2025

Way South State 31B CTB-RT Battery

1/9/2026, 2:40:16 PM

Karst Occurrence Potential

High

1:2,257

0 0.02 0.04 0.09 mi

0 0.04 0.07 0.15 km

BLM, OCD, New Mexico Tech, Microsoft, Vantor, Esri, HERE, Garmin, iPC

New Mexico Oil Conservation Division

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

U.S. Fish and Wildlife Service
National Wetlands Inventory

Way South State 31B CTB-RT BATTERY

January 9, 2026

Wetlands

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

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

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

National Flood Hazard Layer FIRMette

FEMA

104°7'44"W 32°0'29"N

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

1:6,000

104°7'7"W 31°59'58"N

Basemap Imagery Source: USGS National Map 2023

Legend

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

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

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

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

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

OTHER FEATURES
- 20.2 / 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
- Hydrographic Feature

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

N

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

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

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 1/12/2026 at 7:38 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

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

Attachment C

Photographic Documentation

COG Operating, LLC
Way South 31 B CTB-RT Battery
Incident No. naPP2530734787
Eddy County, New Mexico

Photo 1 *View of Site location.*

Photo 2 *View of containment towards east.*

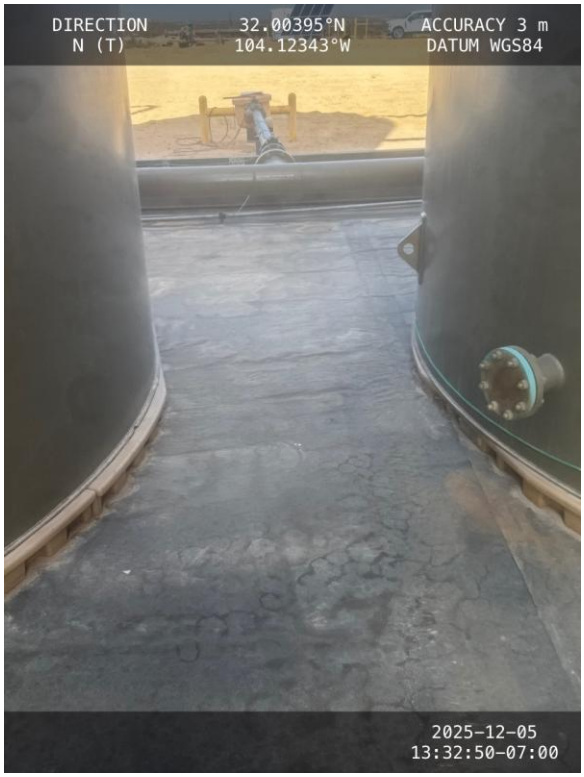

Photo 3 *View of containment towards north.*

Photo 4 *View of southeast corner of containment.*

COG Operating, LLC
Way South 31 B CTB-RT Battery
Incident No. naPP2530734787
Eddy County, New Mexico

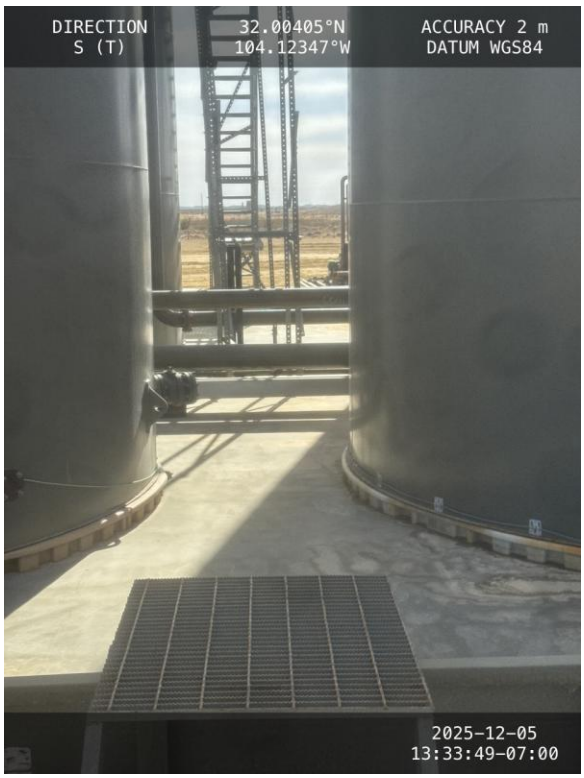

Photo 5 *View of containment towards south.*

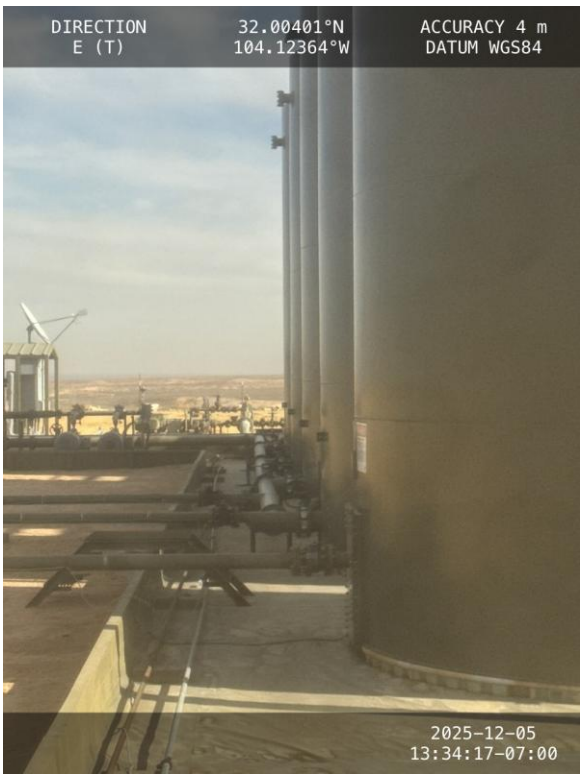

Photo 6 *View of containment towards east.*

Photo 7 *View of containment towards west.*

Photo 8 *View of containment towards west.*

COG Operating, LLC
Way South 31 B CTB-RT Battery
Incident No. naPP2530734787
Eddy County, New Mexico

Photo 9 *View of containment towards south.*

Photo 10 *View of containment towards east.*

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

General Information
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Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 550599

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 550599
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	**nAPP2530734787**
Incident Name	**NAPP2530734787 WAY SOUTH 31 B CTB @ FAPP2131530459**
Incident Type	**Produced Water Release**
Incident Status	**Remediation Closure Report Received**
Incident Facility	**[fAPP2131530459] Way South State 31B CTB-RT BATTERY**

Location of Release Source	
Please answer all the questions in this group.	
Site Name	Way South 31 B CTB
Date Release Discovered	10/23/2025
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 | Dump Line | Produced Water | Released: 5 BBL | Recovered: 5 BBL | Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	*Not answered.*
Natural Gas Vented (Mcf) Details	*Not answered.*
Natural Gas Flared (Mcf) Details	*Not answered.*
Other Released Details	*Not answered.*
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	*Not answered.*

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QUESTIONS (continued)

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Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	**More info needed to determine if this will be treated as 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: Jacqui Harris Title: Sr Environment Engineer Email: jacqui.harris@conocophillips.com Date: 02/04/2026

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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)	Between 26 and 50 (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 1 and 5 (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 1 and 5 (mi.)
Any other fresh water well or spring	Between 1 and 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between ½ and 1 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	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	
Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.	
Requesting a remediation plan approval with this submission	Yes
Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.	
On what estimated date will the remediation commence	11/01/2025
On what date will (or did) the final sampling or liner inspection occur	12/05/2025
On what date will (or was) the remediation complete(d)	12/04/2025
What is the estimated surface area (in square feet) that will be remediated	1500
What is the estimated volume (in cubic yards) that will be remediated	0
These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.	
The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.	

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QUESTIONS

Remediation Plan (continued)	
Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.	
This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:	
(Select all answers below that apply.)	
Is (or was) there affected material present needing to be removed	Yes
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	*Not answered.*
Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
I hereby agree and sign off to the above statement	Name: Jacqui Harris Title: Sr Environment Engineer Email: jacqui.harris@conocophillips.com Date: 02/04/2026
The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.	

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QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	**530925**
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	**12/05/2025**
Was all the impacted materials removed from the liner	**Yes**
What was the liner inspection surface area in square feet	**1500**

Remediation Closure Request	
Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.	
Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	**Yes**
Was this release entirely contained within a lined containment area	**Yes**
What was the total surface area (in square feet) remediated	1500
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	Liner inspected

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

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

I hereby agree and sign off to the above statement	Name: Jacqui Harris Title: Sr Environment Engineer Email: jacqui.harris@conocophillips.com Date: 02/04/2026

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CONDITIONS

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CONDITIONS

Created By	Condition	Condition Date
nvelez	Liner inspection approved, release resolved. Restoration complete.	2/6/2026