



January 6, 2026

Mr. Jacob Laird
Environmental Engineer
ConocoPhillips
2208 W Main St.
Artesia, New Mexico 88210
Via email: Jacob.Laird@conocophillips.com

**Re: Reclamation Closure Request
Columbus Fee 23H Flowline Release
ConocoPhillips
Lea County, New Mexico
Incident ID: nAPP2500736394
Approximate Release GPS: 32.0923754°, -103.5566964°
DOR: 12/30/24
Landowner: Private**

Sir or Madam:

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips Company (ConocoPhillips) to evaluate a release that occurred at the Columbus Fee #23H Central Tank Battery (CTB) (facility fAB1909251433). The release footprint is located on private land in Public Land Survey System (PLSS) Unit Letter B, Section 34, Township 25 South, and Range 33 East, in Lea County, New Mexico (Site). The approximate release point coordinates are 32.0923754°, -103.5566964°. The Site location is shown on Figures 1 and 2.

BACKGROUND

According to the C-141 Initial Report, the release was discovered on December 30, 2024, and was caused by a hole in the flowline due to corrosion. Approximately 1 barrel (bbl) of crude oil and 13 bbls of produced water were reported released, of which 1 bbl of crude oil and 1 bbl of produced water were recovered. The release occurred behind the tank battery near production lines, in an on-pad area.

The New Mexico Oil Conservation Division (NMOCD) received the initial C-141 on January 7, 2025, and subsequently assigned the release the Incident ID nAPP2500736394. The NMOCD approved the Remediation Work Plan on April 7, 2025. A Remediation Closure Request on behalf of COP dated August 22, 2025, was submitted to the NMOCD and subsequently approved on October 7, 2025.

SUMMARY OF ASSESSMENT ACTIVITIES

In January and February 2025, Tetra Tech was on Site to conduct assessment activities on behalf of ConocoPhillips. Assessment activities included installing four (4) hand auger borings (AH-1 through AH-4) in the release area footprint to a total depth ranging from 3-3.5 feet bgs. Auger refusal was met at roughly between 3 and 3.5 feet bgs. Four (4) hand auger borings (AH-5 through AH-8) were installed along the perimeter of the release extent to 1-foot bgs. T-1 was installed to 4.5 feet bgs and T-2 was installed to 5 feet bgs. Assessment sampling locations are presented in Figure 3.

A total of twenty-four (24) soil samples were sent to Cardinal Laboratories in Hobbs, New Mexico to be analyzed for chloride via Standard Method 4500Cl-B, TPH via EPA Method 8015M, and BTEX via EPA Method 8021B.

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The laboratory analytical results from the January and February 2025 assessment sampling activities are summarized in Table 1. Analytical results associated with various soil depth intervals at AH-2, AH-3, T-1, and T-2 exceeded the Site RRAL for Total TPH (2,500 mg/kg). Additionally, analytical results associated with the surface soil interval (0'-1') at AH-1 and T-1 and the terminal soil interval (3'-3.5' bgs) at AH-4 exceeded the Site RRAL for TPH GRO+DRO (1,000 mg/kg). Analytical results associated with all soil depth intervals at AH-2 and T-2 and the upper soil depth interval (0'-1') at AH-3 exceeded the Site RRAL for BTEX (50 mg/kg).

The release area footprint was in on-pad area within an active production facility with production lines, in both the subsurface and at the surface. Horizontal delineation of the release was achieved as a result of the January 2025 assessment activities. Trenching was required at the release Site due to the dense subsurface lithology. During the remobilization on February 2025, vertical delineation of TPH impacts were not fully achieved at sample location T-2. Trenching deeper than the 5' bgs interval at T-2 was not feasible due to safety concerns associated with the pressurized lines and limitations on equipment accessibility.

REMEDIATION WORK PLAN AND NMOCD APPROVAL

Tetra Tech, on behalf of ConocoPhillips, prepared a Release Characterization and Remediation Work Plan dated March 28, 2025 that described the assessment activities and proposed remedial actions to address the release incident.

The Release Characterization and Remediation Work Plan was conditionally approved by the NMOCD on April 7, 2025 with the following comments:

- *"The Remediation Plan is Conditionally Approved. 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 >100', a shallow borehole can be drilled to 101' 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.*
- *Floor confirmation samples should be delineated/excavated to meet closure criteria standards from Table 1 of the OCD Spill Rule for site assessment/characterization/depth to water determination. Sidewall/Edge samples should be delineated/excavated to 600 mg/kg for chlorides and 100 mg/kg for TPH to define the edge of the release. Please make sure that the edge of the release extent is accurately defined, especially around equipment. All off pad areas must meet reclamation standards in the OCD Spill Rule. The work will need to be completed in 90 days after the report has been reviewed."*

SUMMARY OF REMEDIATION ACTIVITIES

ConocoPhillips operations personnel mobilized to the Site to conduct remedial activities from June 18 through June 21, 2025. Prior to confirmation sampling, the NMOCD district office was notified on June 16, 2025 via the OCD Portal (C-141N) in accordance with Subsection D of 19.15.29.12 NMAC. A variance to continue confirmation sampling outside of the initial notice period was requested for June 20, 2025, and was denied by the NMOCD.

ConocoPhillips operations excavated impacted soils as presented in Figure 4. The release was excavated to the maximum extent practicable due to the numerous surface lines and subsurface lines present within the excavation area in an active facility. The western portion of the release extent, in the vicinity of assessment sampling locations AH-1 and T-1, was excavated to 1.5 feet bgs. The eastern portion of the release extent, in the vicinity of assessment sampling location AH-4, was excavated to 4 feet bgs. The central portion of the release extent, in the vicinity of assessment sampling location T-2, was excavated to a final depth of 9 feet bgs. Photographs from the excavated areas prior to backfill are provided in Appendix A.

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All of the excavated material was transported offsite for proper disposal. Approximately one-hundred and fifty-two (152) cubic yards of material were transported to the R360 Halfway in Hobbs, New Mexico.

Following excavation, confirmation floor and sidewall samples were collected and submitted for laboratory analysis to verify efficacy of remediation activities. Confirmation samples were collected such that each discrete sample (sidewall and floor) was representative of no more than 200 square feet of excavated area. Confirmation sidewall sample locations were labeled with "SW"-#, and confirmation floor sample locations were labeled with "FS"- #.

The results of the June 2025 confirmation sampling events are summarized in Table 2. The analytical results were directly compared to the established Site RRALs to demonstrate compliance. All final confirmation soil samples (floor and sidewall) were below the applicable cleanup levels for all analyzed constituents. Final excavated areas, depths, and representative confirmation sample locations are indicated in Figure 4.

2025 CLOSURE REQUEST AND NMOCD APPROVAL

A Closure Request dated August 22, 2025 was prepared by Tetra Tech on behalf of ConocoPhillips following the remediation activities. The closure report provided the Site Characterization in accordance with 19.15.29.11 NMAC and described assessment and remediation activities performed at the Site in accordance with 19.15.29.11 NMAC and 19.15.29.12 NMAC.

The Closure Request was approved by the NMOCD on October 7, 2025. The current incident status is listed as *Remediation Closure Report Approved, Pending submission of Reclamation Report from the operator.*

SUMMARY OF RECLAMATION ACTIVITIES

Based on 19.15.29.13 NMAC, areas disturbed by the remediation have been reclaimed. Collected confirmation samples were placed into laboratory-provided sample containers, transferred under chain-of-custody, and analyzed within appropriate holding times by Cardinal. The soil samples were analyzed for TPH (GRO+DRO+MRO) by EPA Method 8015M, BTEX by EPA Method 8021B, and chlorides by SM4500CI-B. The analytical results were directly compared to the reclamation requirements and established Site RRALs to demonstrate compliance. All final confirmation soil samples (floor, sidewall and interstitial) were below Site RRALs for chloride, TPH, and BTEX. Excavated areas, depths and confirmation sample locations are indicated in Figure 4. The results of the June 2025 confirmation sampling events are summarized in Table 2.

Once acceptable confirmation sample results were received, the excavation was backfilled with clean material to pre-release grade. In accordance with 19.15.29.12 NMAC, the reclaimed area contained non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg as analyzed by SM4500CI-B. One (1) representative 5-point composite sample was collected from the backfill material used for the project site. Soil backfill composite sampling results are summarized in Table 3. Copies of laboratory analysis and chain-of-custody documentation are included in Appendix B. As this is an active facility, final reclamation of the facility shall take place in accordance with 19.15.29.12 NMAC once the Site is no longer being used for oil and gas production.

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CONCLUSION

Based on the results of the reclamation activities and confirmation sampling, ConocoPhillips respectfully requests approval of the reclamation activities completed for this incident. If you have any questions concerning the remediation activities for the Site, please call me at (512) 596-8201.

Sincerely,

Tetra Tech, Inc.



Samantha Abbott, P.G.
Senior Project Manager



Lisbeth Chavira
Project Manager

cc:
Mr. Jacob Laird, GPBU – ConocoPhillips

Reclamation Closure Request
January 6, 2026

ConocoPhillips

LIST OF ATTACHMENTS

Figures:

- Figure 1 – Overview Map
- Figure 2 – Topographic Map
- Figure 3 – Site Location and Well Location
- Figure 4 – Approximate Release Extent and Assessment
- Figure 5 – Remediation Extent and Confirmation Sampling

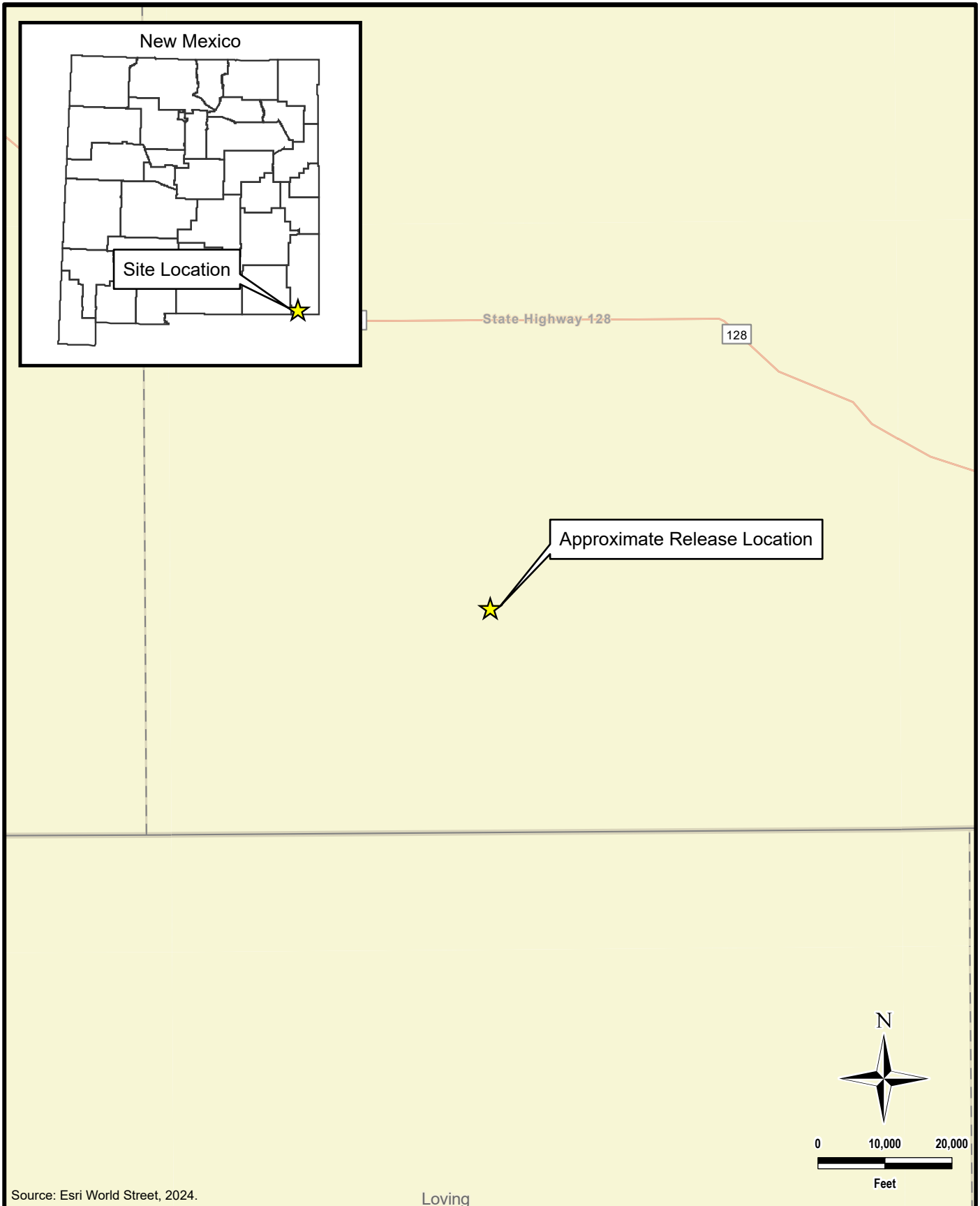
Tables:

- Table 1 – Summary of Analytical Results – 2025 Soil Assessment
- Table 2 – Summary of Analytical Results – 2025 Soil Remediation
- Table 3 – Summary of Analytical Results – 2025 Soil Backfill

Appendices:

- Appendix A – Photographic Documentation
- Appendix B – Laboratory Analytical Data

FIGURES



Source: Esri World Street, 2024.

Loving

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TETRA TECH

www.tetrattech.com

901 West Wall Street, Suite 100
Midland, Texas 79701
Phone: (432) 682-4559
Fax: (432) 682-3946

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LEA COUNTY, NEW MEXICO

**COLUMBUS FEE 23H FLOWLINE RELEASE
OVERVIEW MAP**

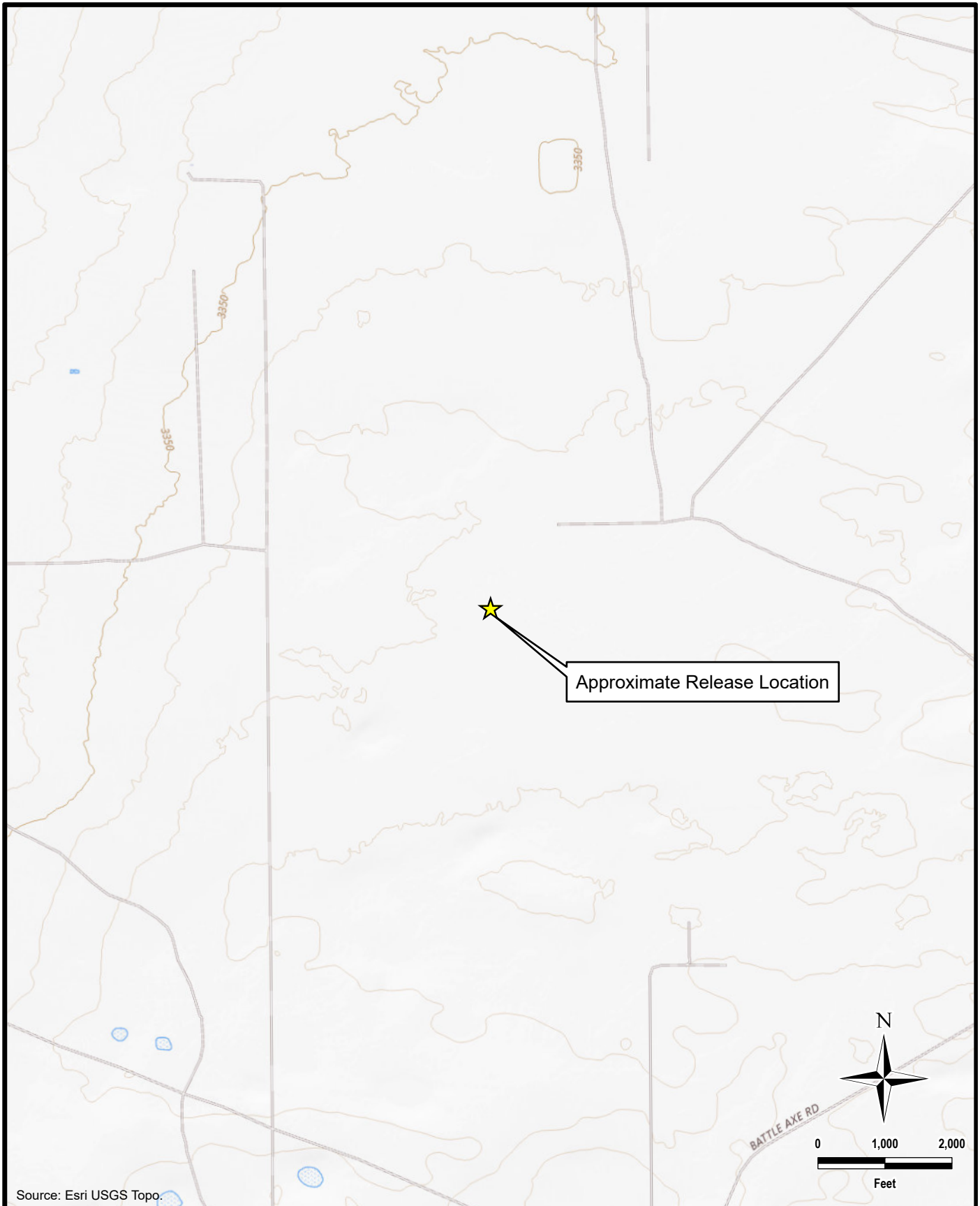
PROJECT NO.: 212C-MD-03749

DATE: MARCH 14, 2025

DESIGNED BY: LMV

Figure No.

1



Source: Esri USGS Topo.

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901 West Wall Street, Suite 100
Midland, Texas 79701
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**COLUMBUS FEE 23H FLOWLINE RELEASE
TOPOGRAPHIC MAP**

PROJECT NO.: 212C-MD-0

DATE: MARCH 14, 2025

DESIGNED BY: LMV

Figure No.

2



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Legend

Wellhead

Source: Google Earth, 2023.

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Midland, Texas 79701
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Fax: (432) 682-3946

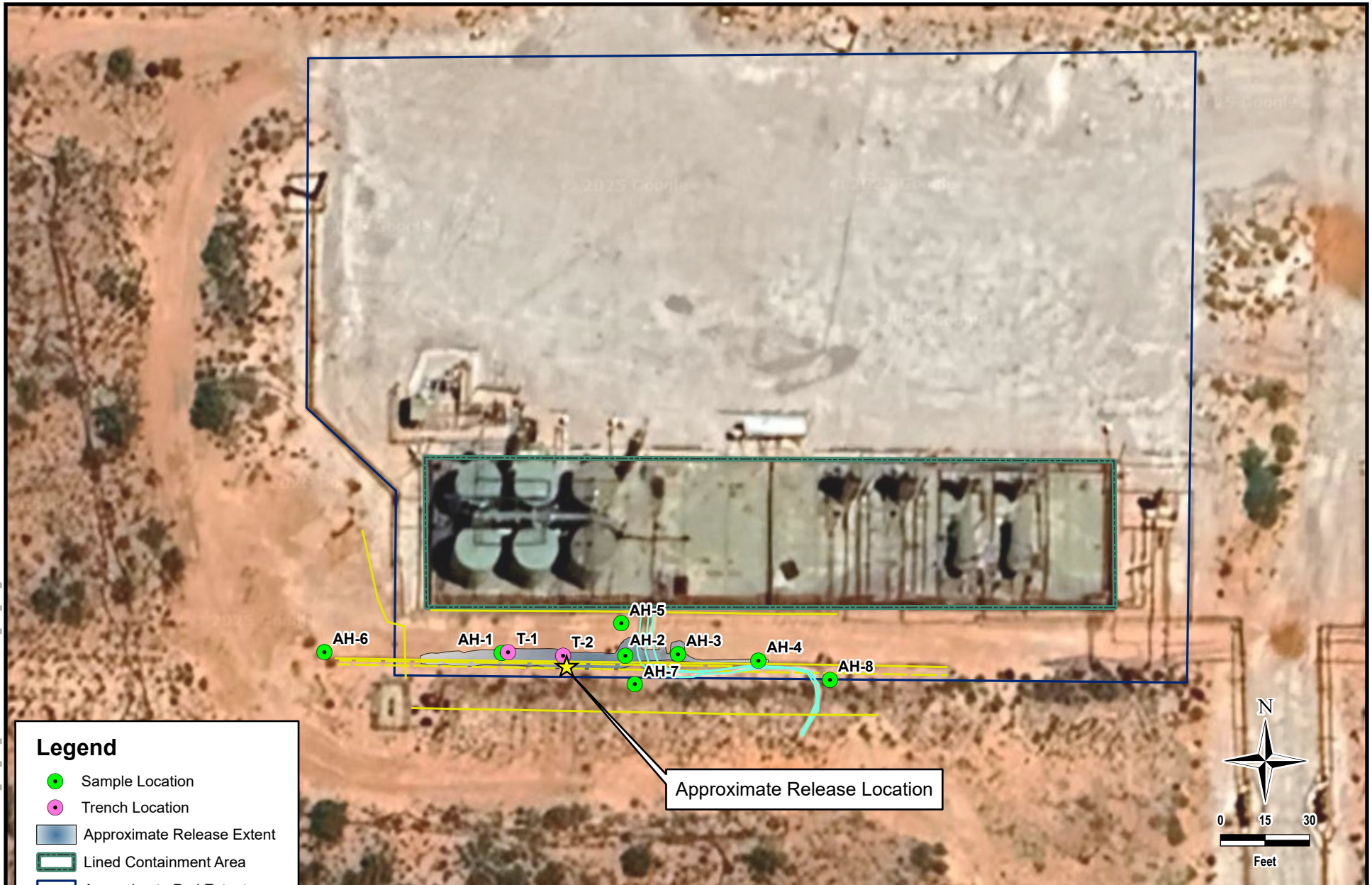
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**COLUMBUS FEE 23H FLOWLINE RELEASE
SITE LOCATION AND WELL LOCATION**

PROJECT NO.:	212C-MD-03749
DATE:	AUGUST 15, 2025
DESIGNED BY:	LMV
Figure No.	3

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Legend

- Sample Location
- Trench Location
- Approximate Release Extent
- Lined Containment Area
- Approximate Pad Extent
- Underground Steel Line
- Surface Polyline
- Surface Steel Petroleum Line

Source: Google Earth, 2023.

Approximate Release Location

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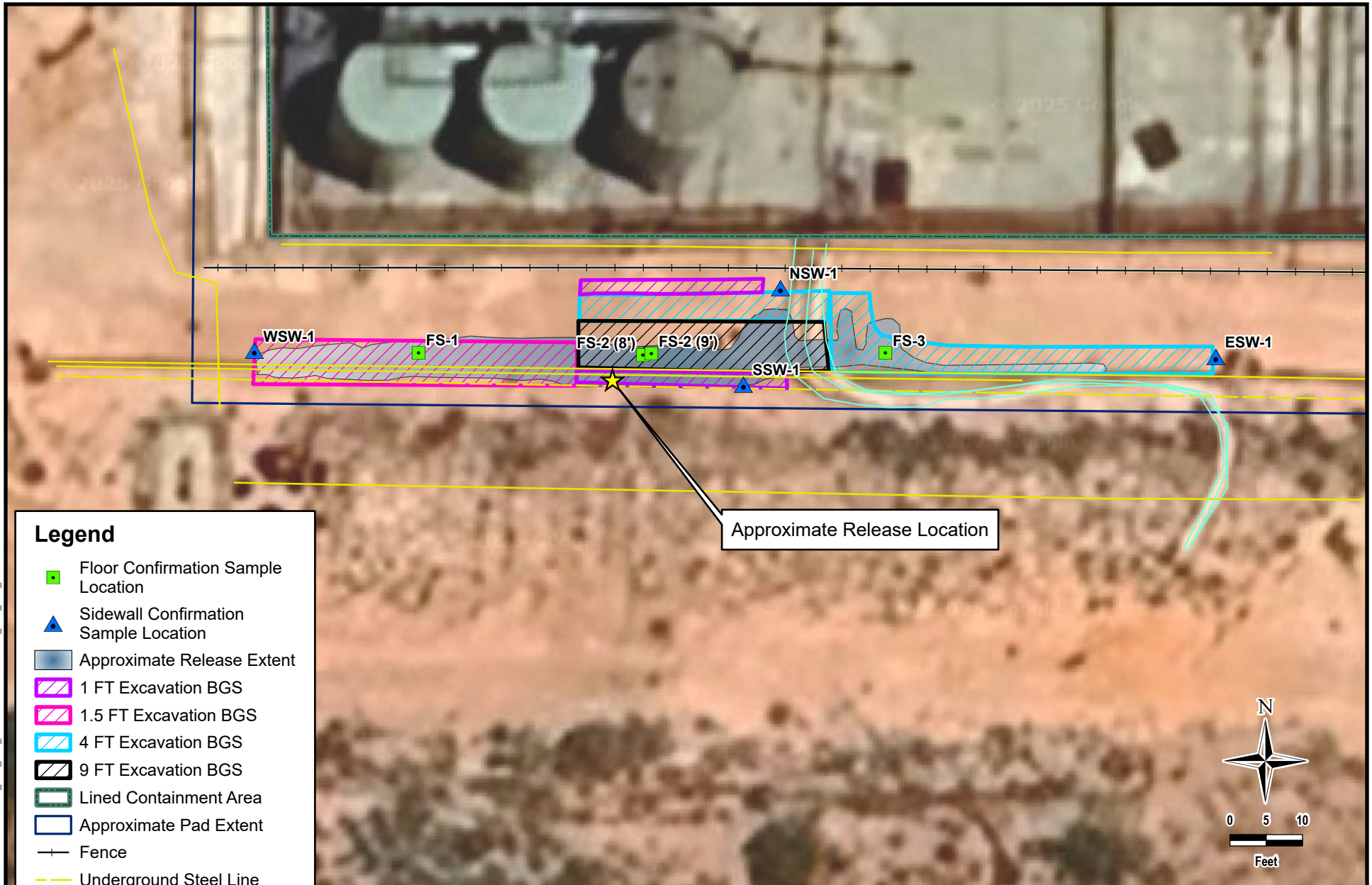
901 West Wall Street, Suite 100
Midland, Texas 79701
Phone: (432) 682-4559
Fax: (432) 682-3946

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**COLUMBUS FEE 23H FLOWLINE RELEASE
APPROXIMATE RELEASE EXTENT AND SITE ASSESSMENT**

PROJECT NO.:	212C-MD-03749
DATE:	AUGUST 15, 2025
DESIGNED BY:	LMV
Figure No.	4



Approximate Release Location

Legend

- Floor Confirmation Sample Location
- ▲ Sidewall Confirmation Sample Location
- Approximate Release Extent
- 1 FT Excavation BGS
- 1.5 FT Excavation BGS
- 4 FT Excavation BGS
- 9 FT Excavation BGS
- Lined Containment Area
- Approximate Pad Extent
- Fence
- Underground Steel Line
- Surface Steel Petroleum Line
- Surface Polyline

BGS: Below Ground Surface
Source: Google Earth, 2023.

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www.tetrattech.com
901 West Wall Street, Suite 100
Midland, Texas 79701
Phone: (432) 682-4559
Fax: (432) 682-3946

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**COLUMBUS FEE 23H FLOWLINE RELEASE
REMEDATION EXTENT AND CONFIRMATION SAMPLING**

PROJECT NO.: 212C-MD-03749
DATE: AUGUST 15, 2025
DESIGNED BY: LMV
Figure No.
5

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TABLES

TABLE 1
SUMMARY OF ANALYTICAL RESULTS
SOIL ASSESSMENT- nAPP2500736394
CONOCOPHILLIPS
COLUMBUS FEE 23H FLOWLINE RELEASE
LEA COUNTY, NM

19.15.29.12 NMAC Closure Criteria for Soils Impacted by a Release (>100 ft):			Chlorides ¹		BTEX ²								TPH ³									
Sample ID	Sample Date	Sample Depth Interval	< 20,000 mg/kg		< 10 mg/kg		Toluene		Ethylbenzene		Total Xylenes		< 50 mg/kg		GRO		DRO		EXT DRO		< 2,500 mg/kg	1,000 mg/kg
			Chloride		Benzene								Total BTEX		C ₆ - C ₁₀		> C ₁₀ - C ₂₈		> C ₂₈ - C ₃₆		Total TPH (GRO+DRO+EXT DRO)	GRO+DRO
			mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q
AH-1	1/15/2025	0-1	7,920		0.312	S-04	4.15	S-04	5.70	C-NC1, S-	18.6	S-04	28.8	C-NC1, S-	431		1,480		149		2,060	1,911
		2-3	8,000		<0.050		0.063		0.312	GC-NC1	0.283		0.658	GC-NC1	<10.0		114		<10.0		114	114
		3-3.5	6,800		<0.050		0.208		0.434	GC-NC1	0.797		1.44	GC-NC1	<10.0		85.6		<10.0		85.6	85.6
AH-2	1/15/2025	0-1	5,700		7.15		63.3		53.5	GC-NC1	235		359	GC-NC1	8,520		21,800		2,820		33,140	30,320
		2-3	6,800		4.39		51.4		42.4	GC-NC1	183		281	GC-NC1	5,880		13,200		1,750		20,830	19,080
		3-3.5	6,600		3.99	QM-07	43	QM-07	15.2	NC1, QM	140	QM-07	202	GC-NC1	4,210		9,550		926		14,686	13,760
AH-3	1/15/2025	0-1	4,500		1.28		32.5		15	GC-NC1	147		196	GC-NC1	4,430		11,900		1,540		17,870	16,330
		2-3	5,800		<0.050		1.79		1.13	GC-NC1	11.4		14.4	GC-NC1	489		1,770		216		2,475	2,259
		3-3.5	5,600		<0.050		1.38		0.983	GC-NC1	10.3		12.6	GC-NC1	512	QM-07	1,680	QM-07	246		2,438	2,192
AH-4	1/15/2025	0-1	160		<0.050		<0.050		<0.050		0.291		<0.300		12.2		109		10.8		132	121.2
		2-3	352		<0.050		<0.050		<0.050		0.461		0.461		11		78.5		<10.0		89.5	89.5
		3-3.5	208		<0.050		0.444		0.461	GC-NC1	5.71		6.62	GC-NC1	231		920		131		1,282	1,151
AH-5	1/15/2025	0-1	64		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	-
AH-6	1/15/2025	0-1	16		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	-
AH-7	1/15/2025	0-1	64		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	-
AH-8	1/15/2025	0-1	48		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	-
T-1	2/13/2025	0-1	6,000		0.219		3.68		1.73		17.6		23.2		791		2,880		399		4,070	3,671
		2-3	8,000		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	-
		3-4	2,120		<0.050		<0.050		<0.050		<0.150		<0.300		14.7		355		59.8		429.5	369.7
		4-4.5	1,570		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	-
T-2	2/13/2025	0-1	560		13.9		152		43.5		405		615		12,200		21,900		3,320		37,420	34,100
		2-3	2,350		8.74		70.7		16.7		158		254		6,750		10,000		1,450		18,200	16,750
		3-4	5,200		30.4		193		44.3		395		663		18,100		26,400		3,690		48,190	44,500
		4-5	4,660		8.54		86.7		23.7		220		339		9,830		18,400		2,660		30,890	28,230

NOTES:

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

Bold and italicized values indicated exceedances of proposed RRALs and Reclamation Requirements.

Shaded rows indicate intervals that were excavated and removed during remedial activities..

QUALIFIERS:

- S-04 The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
- QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
- GC-NC1 8260 confirmation analysis was performed; initial GC results were not supported by GC/MS analysis and are biased high with interfering compounds.

TABLE 2
 SUMMARY OF ANALYTICAL RESULTS
 SOIL REMEDIATION - nAPP2500736394
 CONOCOPHILLIPS
 COLUMBUS FEE 23H FLOWLINERRELEASE
 LEA COUNTY, NM

Sample ID	Sample Date	Sample Depth	Chloride ¹		BTEX ²								TPH ³								
					Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO		DRO		EXT DRO		Total TPH (GRO+DRO+EXT DRO)
					mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	
FS-1	6/19/2025	1.5	64.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
FS-2	6/19/2025	8	848		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		262		40		302
FS-2 (9')	6/20/2025	9	48.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		89.5		26		115.5
FS-3	6/19/2025	4	256		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		366		74.5		440.5
NSW-1	6/19/2025	-	160		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		26.8		<10.0		26.8
WSW-1	6/19/2025	-	80.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		28.9		<10.0		28.9
SSW-1	6/19/2025	-	128		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		74.8		12		86.8
ESW-1	6/19/2025	-	96.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		58.3		<10.0		58.3

NOTES:

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

Bold and italicized values indicate exceedance of proposed Remediation RRALs and Reclamation Requirements.

Gold highlight represents soil horizons that were removed during deepening of excavation floors.

Green highlight represents soil intervals that were removed during horizontal expansion of excavation sidewalls.

TABLE 3
 SUMMARY OF ANALYTICAL RESULTS
 SOIL REMEDIATION (BACKFILL)- nAPP2500736394
 CONOCOPHILLIPS
 COLUMBUS FEE 23H
 LEA COUNTY, NM

Sample ID	Sample Date	Sample Depth	Chloride ¹		TPH ³						
					GRO		DRO		EXT DRO		Total TPH (GRO+DRO+EXT DRO)
					C ₆ - C ₁₀		> C ₁₀ - C ₂₈		> C ₂₈ - C ₃₆		
in. bgs	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg		
Columbus Backfill	9/3/2025	-	<16.0		<10.0		<10.0		<10.0		-

NOTES:

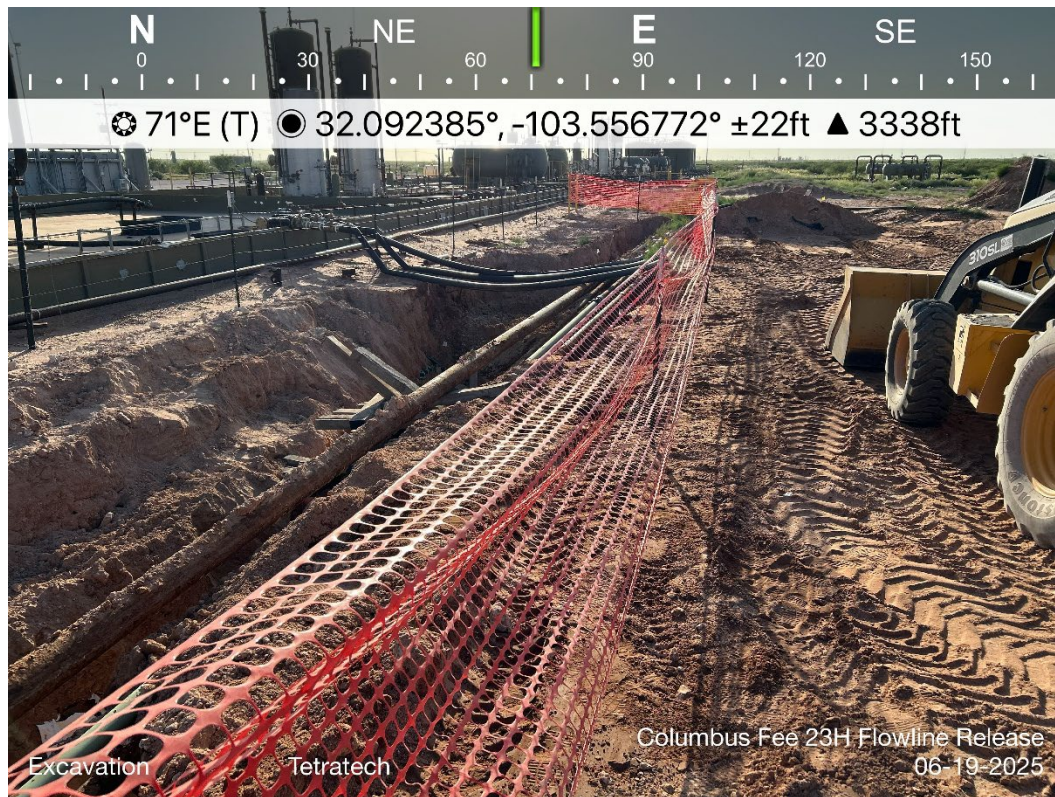
- ft. Feet
- bgs Below ground surface
- mg/kg Milligrams per kilogram
- TPH Total Petroleum Hydrocarbons
- GRO Gasoline range organics
- DRO Diesel range organics
- 1 Method SM4500Cl-B
- 2 Method 8021B
- 3 Method 8015M

APPENDIX A

Photographic Documentation



TETRA TECH, INC. PROJECT NO. 212C-MD-03749	DESCRIPTION	View South. Columbus Fee CTB sign on pad	1
	SITE NAME	Columbus Fee CTB	7/21/2025



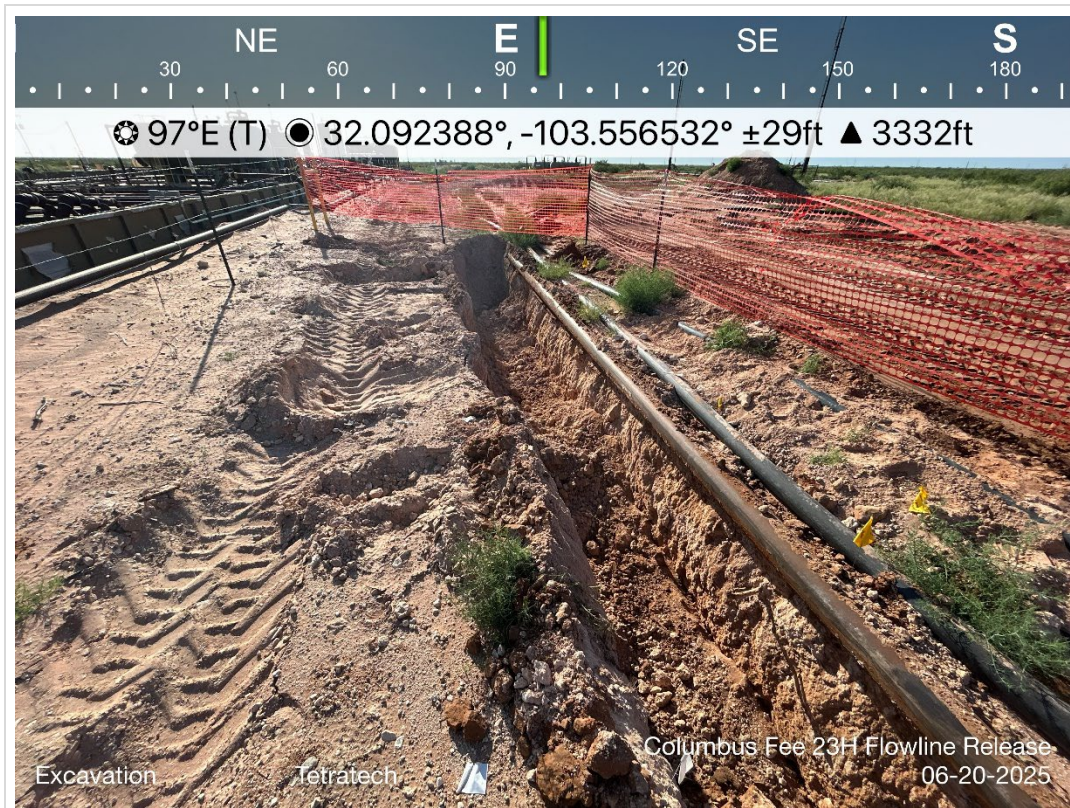
TETRA TECH, INC. PROJECT NO. 212C-MD-03749	DESCRIPTION	View east. View of excavation extent. View of steel lines and polylines.	2
	SITE NAME	Columbus Fee CTB	6/19/2025



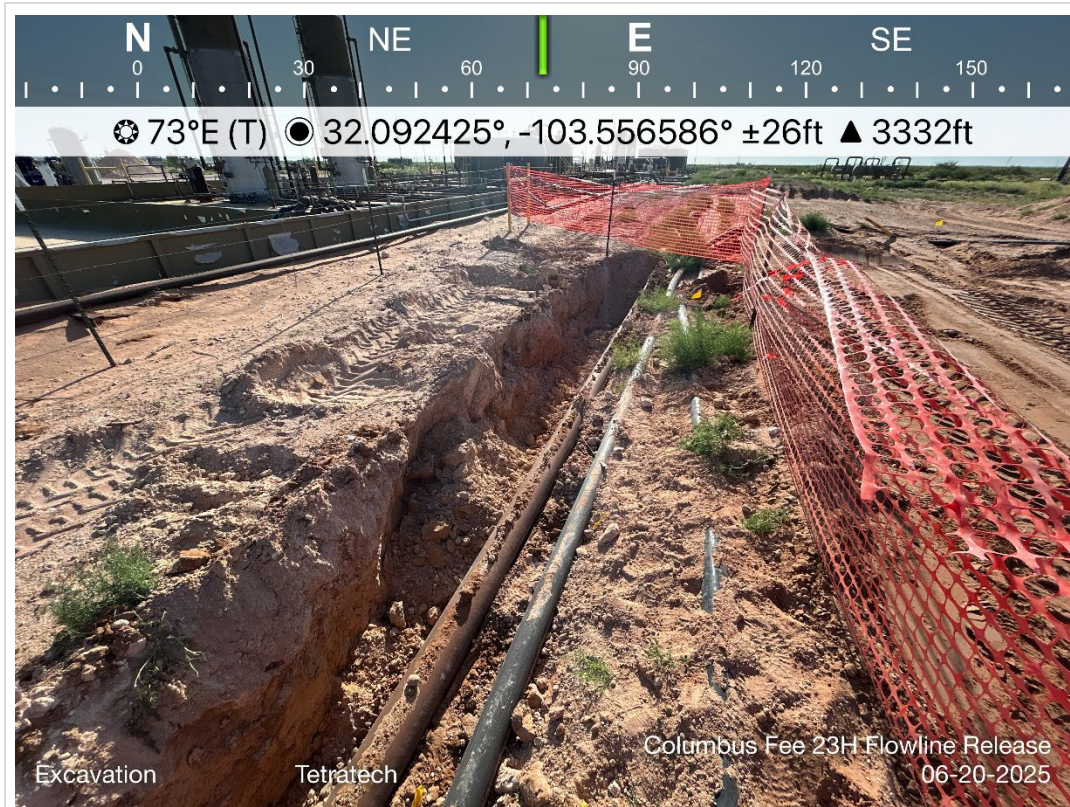
TETRA TECH, INC. PROJECT NO. 212C-MD-03749	DESCRIPTION	View east. View of excavation extent. View of steel lines and polylines.	3
	SITE NAME	Columbus Fee CTB	6/20/2025



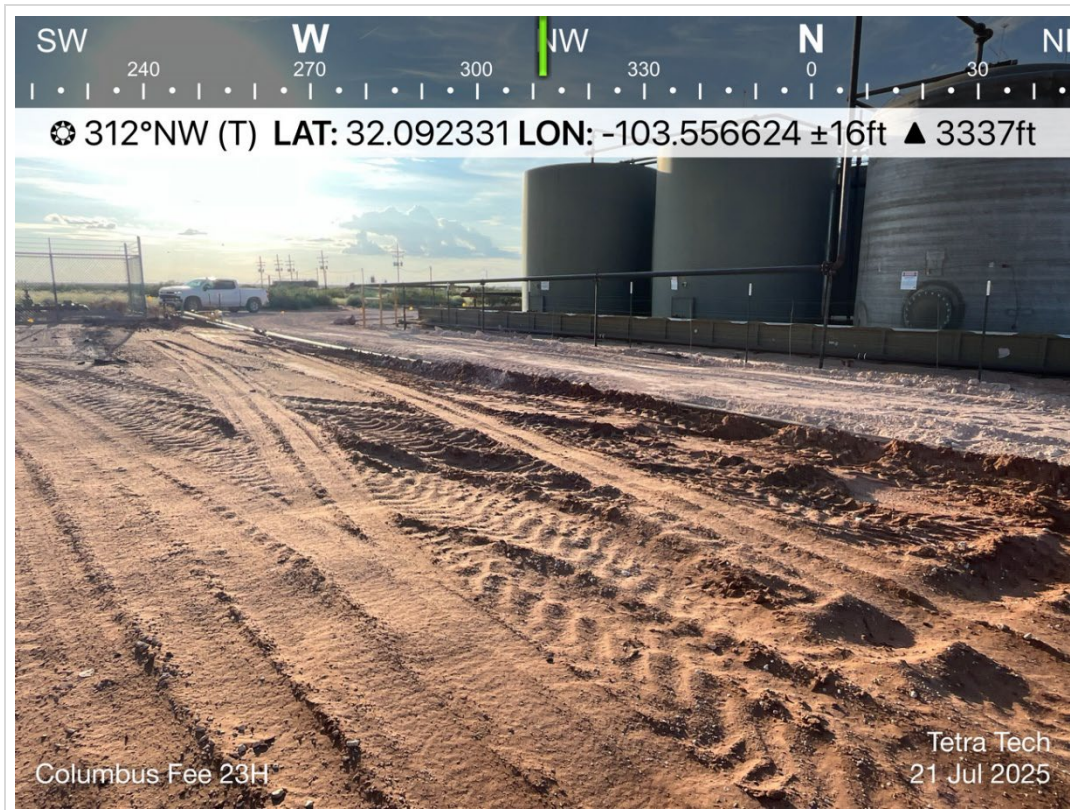
TETRA TECH, INC. PROJECT NO. 212C-MD-03749	DESCRIPTION	View south. View of excavation extent. View of steel lines and polylines.	4
	SITE NAME	Columbus Fee CTB	6/20/2025



TETRA TECH, INC. PROJECT NO. 212C-MD-03749	DESCRIPTION	View east. View of excavation extent. View of steel lines.	5
	SITE NAME	Columbus Fee CTB	6/20/2025



TETRA TECH, INC. PROJECT NO. 212C-MD-03749	DESCRIPTION	View North. View of surface steel lines and polylines. View of facility.	6
	SITE NAME	Columbus Fee CTB	6/20/2025



TETRA TECH, INC. PROJECT NO. 212C-MD-03749	DESCRIPTION	View northwest. View of backfilled excavation extent.	7
	SITE NAME	Columbus Fee CTB	7/21/2025



TETRA TECH, INC. PROJECT NO. 212C-MD-03749	DESCRIPTION	View northeast. View of backfilled excavation extent.	8
	SITE NAME	Columbus Fee CTB	7/21/2025



TETRA TECH, INC. PROJECT NO. 212C-MD-03749	DESCRIPTION	View northeast. View of backfilled excavation extent.	9
	SITE NAME	Columbus Fee CTB	7/21/2025



TETRA TECH, INC. PROJECT NO. 212C-MD-03749	DESCRIPTION	View southwest. View of backfilled excavation extent.	10
	SITE NAME	Columbus Fee CTB	7/21/2025



TETRA TECH, INC. PROJECT NO. 212C-MD-03749	DESCRIPTION	View southwest. View of water mill.	11
	SITE NAME	Columbus Fee CTB	6/23/2025

APPENDIX B

Laboratory Analytical Data



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

September 09, 2025

LISBETH CHAVIRA

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: COLUMBUS FEE 23H

Enclosed are the results of analyses for samples received by the laboratory on 09/03/25 9:53.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C25-00101. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene".

Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

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

Received:	09/03/2025	Sampling Date:	09/03/2025
Reported:	09/09/2025	Sampling Type:	Soil
Project Name:	COLUMBUS FEE 23H	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03952	Sample Received By:	Alyssa Parras
Project Location:	COP - LEA CO NM		

Sample ID: COLUMBUS BACKFILL (H255451-01)

Chloride, SM4500CI-B		mg/kg		Analyzed By: KH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	09/03/2025	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/03/2025	ND	190	95.0	200	0.603	
DRO >C10-C28*	<10.0	10.0	09/03/2025	ND	197	98.5	200	2.93	
EXT DRO >C28-C36	<10.0	10.0	09/03/2025	ND					

Surrogate: 1-Chlorooctane	112 %	44.4-145
Surrogate: 1-Chlorooctadecane	99.6 %	40.6-153

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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Notes and Definitions

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

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Celey D. Keene, Lab Director/Quality Manager

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Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

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

QUESTIONS

Action 540586

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 540586
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2500736394
Incident Name	NAPP2500736394 COLUMBUS FEE 023H @ FAB1909251433
Incident Type	Release Other
Incident Status	Reclamation Report Received
Incident Facility	[fAB1909251433] COLUMBUS FEE #23H CTB

Location of Release Source	
<i>Please answer all the questions in this group.</i>	
Site Name	COLUMBUS FEE 023H
Date Release Discovered	12/30/2024
Surface Owner	Private

Incident Details	
<i>Please answer all the questions in this group.</i>	
Incident Type	Release Other
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	
<i>Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.</i>	
Crude Oil Released (bbls) Details	Cause: Corrosion Flow Line - Production Crude Oil Released: 1 BBL Recovered: 1 BBL Lost: 0 BBL.
Produced Water Released (bbls) Details	Cause: Corrosion Flow Line - Production Produced Water Released: 13 BBL Recovered: 1 BBL Lost: 12 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 540586

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 540586
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	No
Reasons why this would be considered a submission for a notification of a major release	<i>Unavailable.</i>
<i>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.</i>	

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	<i>Not answered.</i>

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: Jacob Laird Title: Environmental Engineer Email: jacob.laird@conocophillips.com Date: 01/06/2026
--	---

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

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QUESTIONS, Page 3

Action 540586

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 540586
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

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 100 and 500 (ft.)
What method was used to determine the depth to ground water	Direct Measurement
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 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 500 and 1000 (ft.)
Any other fresh water well or spring	Between 500 and 1000 (ft.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1/2 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	Low
A 100-year floodplain	Greater than 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
<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)	8000
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	37420
GRO+DRO (EPA SW-846 Method 8015M)	34100
BTEX (EPA SW-846 Method 8021B or 8260B)	663
Benzene (EPA SW-846 Method 8021B or 8260B)	30.4

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	06/02/2025
On what date will (or did) the final sampling or liner inspection occur	06/04/2025
On what date will (or was) the remediation complete(d)	06/06/2025
What is the estimated surface area (in square feet) that will be reclaimed	528
What is the estimated volume (in cubic yards) that will be reclaimed	103
What is the estimated surface area (in square feet) that will be remediated	528
What is the estimated volume (in cubic yards) that will be remediated	103

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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Phone: (505) 476-3441

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QUESTIONS, Page 4

Action 540586

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 540586
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

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.)

(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	fAB1909251433 COLUMBUS FEE #23H CTB
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

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: Jacob Laird Title: Environmental Engineer Email: jacob.laird@conocophillips.com Date: 01/06/2026
--	---

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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Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

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QUESTIONS, Page 5

Action 540586

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 540586
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

QUESTIONS

Deferral Requests Only	
<i>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.</i>	
Requesting a deferral of the remediation closure due date with the approval of this submission	No

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QUESTIONS, Page 6

Action 540586

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 540586
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	475527
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	06/19/2025
What was the (estimated) number of samples that were to be gathered	7
What was the sampling surface area in square feet	528

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	979.9
What was the total volume (cubic yards) remediated	152
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	979.9
What was the total volume (in cubic yards) reclaimed	152
Summarize any additional remediation activities not included by answers (above)	na

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: Jacob Laird Title: Environmental Engineer Email: jacob.laird@conocophillips.com Date: 01/06/2026
--	---

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>

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QUESTIONS, Page 7

Action 540586

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 540586
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

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	979.9
What was the total volume of replacement material (in cubic yards) for this site	152
<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 reseeded commence(d)	01/14/2028
Summarize any additional reclamation activities not included by answers (above)	Once acceptable confirmation sample results were received, the excavation was backfilled with clean material to pre-release grade. In accordance with 19.15.29.12 NMAC, the reclaimed area contained nonwaste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg as analyzed by SM4500CI-B. As this is an active facility, reseeded will commence upon final reclamation.
<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 reseeded 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: Jacob Laird Title: Environmental Engineer Email: jacob.laird@conocophillips.com Date: 01/06/2026

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QUESTIONS, Page 8

Action 540586

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 540586
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

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	No
<i>Per Paragraph (4) of Subsection (D) of 19.15.29.13 NMAC for any major or minor release containing liquids, the responsible party must notify the division when reclamation and re-vegetation are complete.</i>	

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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

CONDITIONS

Action 540586

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 540586
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

CONDITIONS

Created By	Condition	Condition Date
rhamlet	We have received your Reclamation Report for Incident #NAPP2500736394 COLUMBUS FEE 023H, thank you. This Reclamation Report is approved.	2/26/2026