



September 14, 2022

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

**Re: REVISED  
Liner Inspection and Closure Request  
ConocoPhillips (Heritage Concho)  
Super Cobra State Com #001H Battery Valve Release  
Unit Letter I, Section 13, Township 19 South, Range 34 East  
Lea County, New Mexico  
Incident ID# NAPP2218128367**

Sir or Madam:

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips to assess a release that occurred from an equipment failure at the Super Cobra State Com #001H Battery. The release footprint is located in Public Land Survey System (PLSS) Unit Letter I, Section 13, Township 19 South, Range 34 East, in Lea County, New Mexico (Site). The approximate release point occurred at coordinates 32.658672°, -103.507145°, as shown on Figures 1 through 3.

## BACKGROUND

According to the State of New Mexico Form C-141 Initial Report (Appendix A), the release was discovered on June 20, 2020. The release occurred as the result of equipment failure, specifically a crack in a liquid kimray valve.

Approximately 8.4 barrels (bbls) of produced water were reported released, of which 8.4 bbls were recovered. The produced water was released into a lined secondary containment. The volume determination submitted to the NMOCD along with the C-141 documented that all fluids were removed from the secondary containment and back calculated that 8.4 bbls of produced water were released based upon the volume recovered by the vacuum truck. Brittany N. Esparza submitted the initial Form C-141 on June 30, 2022. The NMOCD approved the initial C-141 on July 5, 2022, and subsequently assigned the release the Incident ID NAPP2218128367.

## SITE CHARACTERIZATION

A site characterization was performed and no sinkholes, residences, schools, hospitals, institutions, churches, springs, private domestic water wells, wetlands, incorporated municipal boundaries, subsurface mines, or floodplains are located within the distances specified in 19.15.29 New Mexico Administrative Code (NMAC). The Site is in an area of low karst potential. An NMOSE stream body was identified in the release footprint vicinity, however it is located approximately 400 feet from the lateral extents of the release.

According to the New Mexico Office of the State Engineers (NMOSE) reporting system, there are no water wells within ½ mile (800 meters) of the Site. There is one (1) water well within 1,600 meters of the site with a depth to groundwater of 60 feet below ground surface (bgs). The site characterization data is included in Appendix B.

Tetra Tech

901 West Wall St., Suite 100, Midland, TX 79701

Tel 432.682.4559 Fax 432.682.3946 www.tetrattech.com

## REGULATORY FRAMEWORK

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

Based on the relative absence of water wells within ½ mile of the Site, the strictest Table I closure criteria will be applied to this release incident in lieu of drilling a boring for groundwater depth verification. Thus, based on the site characterization, and in accordance with Table I of 19.15.29.12 NMAC, the RRALs for the Site are as follows:

Constituent	Site RRAL
Chloride	600 mg/kg
TPH (GRO+DRO+ORO)	100 mg/kg
BTEX	50 mg/kg
Benzene	10 mg/kg

## SITE VISIT SUMMARY

On August 5, 2022, Tetra Tech personnel were at the Site to assess current site conditions and take photographs of the impacted area, if any. Photos provided by COP personnel to Tetra Tech indicate the release area footprint and were reviewed prior to the site visit. The photographs are provided in Appendix C.

During the site visit, no evidence of a release was observed in the northern portion of the tank battery secondary containment. The secondary containment is made up of steel walls approximately 2 feet tall with an intact polyethylene liner. The liner was exposed and intact at the time of the site visit. As mentioned, the release was reported as having been contained within the lined secondary containment and, as documented in the C-141, initial response efforts were successful in recovering all released fluids. Photographic documentation of site conditions at the time of the site visit is included in Appendix C.

## LINER INTEGRITY

In accordance with 19.15.29.11(A)(5)(a) NMAC, notification of a liner inspection at the Super Cobra State Com #001H Battery was sent via email to the NMOCD on August 2, 2022. The liner inspection notification email correspondence is included in Appendix D.

On August 5, 2022, Tetra Tech personnel performed an inspection of the liner within the secondary containment of the Super Cobra State Com #001H Battery. The liner was observed to underlie the entirety of the tank battery secondary containment area. The liner was intact with no visible rips or tears and encompassed by a 2-foot-tall steel wall. The liner extended up the steel “muscle” wall. At the time of the liner inspection, a minimal amount of stormwater had accumulated in the lined area due to recent rain events. The standing water lends further evidence to the integrity of the liner as a competent fluid barrier. At the time of the inspection, the liner was intact and had the ability to contain the leak in question. Photographic documentation of the liner inspection is included in Appendix C.

## LINER INSPECTION AND CLOSURE REQUEST

The Initial Liner Inspection and Closure Request was prepared by Tetra Tech on behalf of ConocoPhillips and submitted to NMOCD on September 13, 2022, with fee application payment PO Number 8G8CH-220913-C-1410. Inadvertently, an incomplete C-141 was submitted along with the report. The Closure Request was rejected via email by Jocelyn Harimon the same day, stating the report was rejected for the following reasons:

- *A closure report cannot be reviewed without the corresponding C-141 closure pages. The OCD requires all C- 141 pages to be completely filled out, signed and dated when submitting.*

A copy of the NMOCD correspondence is included as Appendix C. The completed, signed and dated C-141 forms are included with this revised submittal.

## CONCLUSION

Based on the results of the liner inspection, ConocoPhillips respectfully requests closure of the subject incident. The release occurred within a lined containment area. The liner integrity demonstration is complete. The affected area of the liner has been visually inspected where the release occurred, and the liner remains intact and had the ability to contain the leak in question. Two business days' notice was provided to the appropriate division district office before conducting the liner inspection.

The final C-141 forms are enclosed in Appendix A. If you have any questions concerning the liner inspection for the Site, please call me at (432) 210-6952 or Christian at (512) 288-6281.

Sincerely,  
**Tetra Tech, Inc.**



Joe Tyler  
Project Manager



Christian M, Llull, P.G  
Program Manager

cc:  
Mr. Charles Beauvais, PBU - ConocoPhillips

## LIST OF ATTACHMENTS

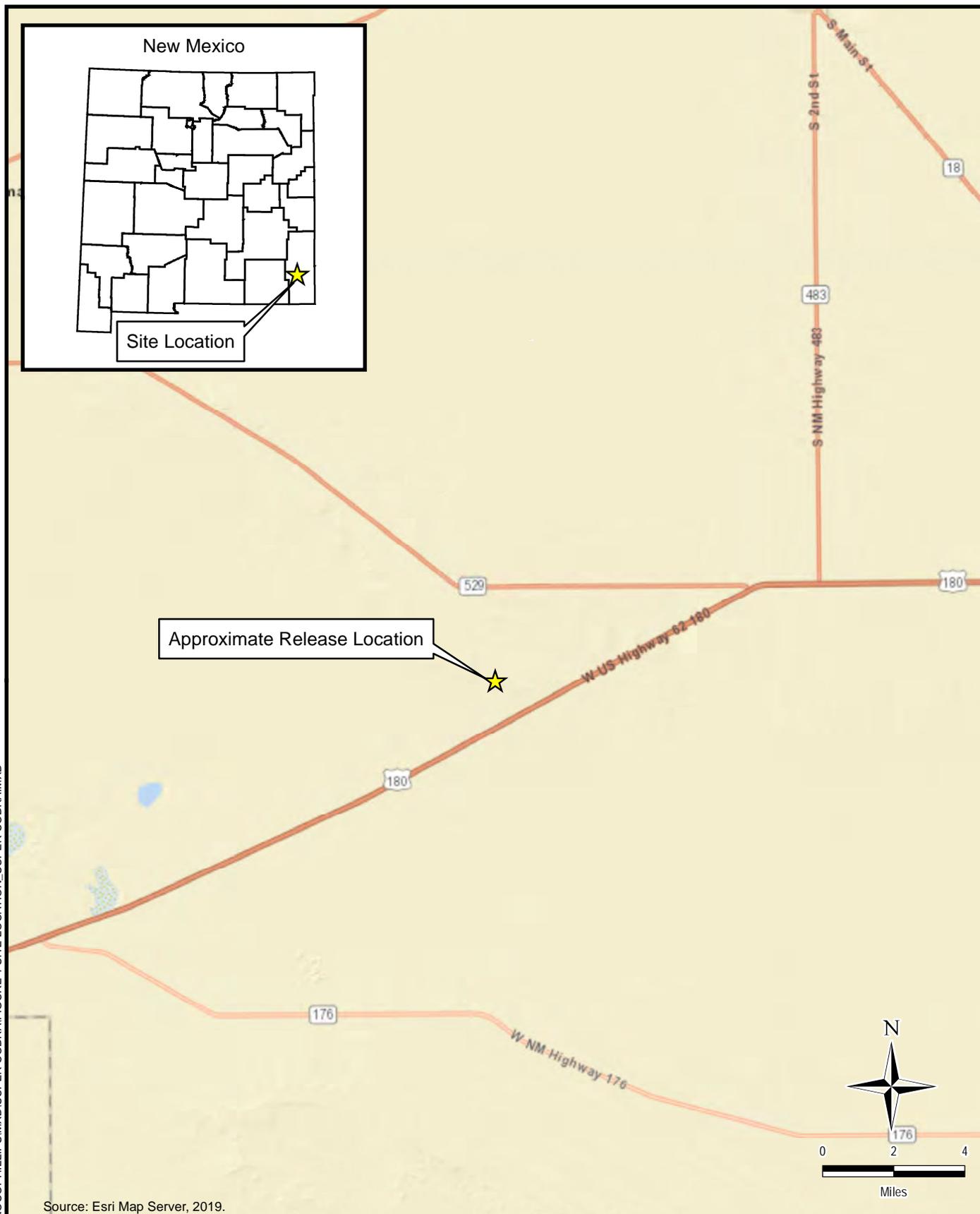
### Figures:

- Figure 1 – Overview Map
- Figure 2 – Topographic Map
- Figure 3 – Site Feature Map and Release Extent

### Appendices:

- Appendix A – C-141 Forms
- Appendix B – Site Characterization Data
- Appendix C – Photographic Documentation
- Appendix D – Regulatory Correspondence

## FIGURES



Source: Esri Map Server, 2019.

DOCUMENT PATH: D:\CONOCOPHILLIPS\MXD\SUPER COBRA\FIGURE 1 SITE LOCATION\_SUPER COBRA.MXD



**TETRA TECH**

www.tetratech.com

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

**CONOCOPHILLIPS**

NAPP2218128367  
(32.658672°, -103.507145°)  
LEA COUNTY, NEW MEXICO

**SUPER COBRA BATTERY VALVE RELEASE  
SITE LOCATION MAP**

PROJECT NO.: 212C-MD-02810

DATE: AUGUST 22, 2022

DESIGNED BY: AAM

Figure No.

**1**



Approximate Release Location

DOCUMENT PATH: D:\CONOCOPHILLIPS\SUPER COBRA\FIGURE 2 TOPO\_SUPER COBRA.MXD

Source: Esri Map Server, 2019.



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

CONOCOPHILLIPS

NAPP2218128367  
 (32.658672°, -103.507145°)  
 LEA COUNTY, NEW MEXICO

SUPER COBRA BATTERY VALVE RELEASE  
 TOPOGRAPHIC MAP

PROJECT NO.: 212C-MD-02810

DATE: AUGUST 22, 2022

DESIGNED BY: AAM

Figure No.

2



### Legend

-  Lined Containment
-  Approximate Release Extent

Source: Esri Map Server, 2019.

DOCUMENT PATH: D:\CONOCOPHILLIPS\MXD\SUPER COBRA\FIGURE 3 RELEASE SUPER COBRA.MXD



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

#### CONOCOPHILLIPS

NAPP2218128367  
 (32.658672°, -103.507145°)  
 LEA COUNTY, NEW MEXICO

### SUPER COBRA BATTERY VALVE RELEASE SITE FEATURE MAP AND RELEASE EXTENT

PROJECT NO.: 212C-MD-02810

DATE: AUGUST 22, 2022

DESIGNED BY: AAM

Figure No.

# 3

# **APPENDIX A C-141 Forms**

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural  
Resources Department

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

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

Incident ID	
District RP	
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party	OGRID
Contact Name	Contact Telephone
Contact email	Incident # (assigned by OCD)
Contact mailing address	

### Location of Release Source

Latitude \_\_\_\_\_ Longitude \_\_\_\_\_  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	Site Type
Date Release Discovered	API# (if applicable)

Unit Letter	Section	Township	Range	County

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

### Nature and Volume of Release

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

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

Cause of Release

State of New Mexico  
Oil Conservation Division

Page 2

Incident ID	
District RP	
Facility ID	
Application ID	

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

### Initial Response

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

<input type="checkbox"/> The source of the release has been stopped. <input type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.
If all the actions described above have <u>not</u> been undertaken, explain why:
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.
Printed Name: _____ Title: _____ Signature: <u></u> Date: _____ email: _____ Telephone: _____
<b><u>OCD Only</u></b> Received by: <u>Jocelyn Harimon</u> Date: <u>07/05/2022</u>

## L48 Spill Volume Estimate Form

Page 12 of 32

Received by OCD: 9/14/2022 10:47:02 AM	Asset Area: DBE	Super Cobra St #1	NAPP2218128367
Release Discovery Date & Time: 6/20/2022 10:20	Release Type: Produced Water		
Provide any known details about the event: liquid kem ray cracked on diss charge side od pump			

## Spill Calculation - On Pad Surface Pool Spill

Convert Irregular shape into a series of rectangles	Length (ft.)	Width (ft.)	Deepest point in each of the areas (in.)	No. of boundaries of "shore" in each area	Estimated Pool Area (sq. ft.)	Estimated Average Depth (ft.)	Estimated volume of each pool area (bbl.)	Penetration allowance (ft.)	Total Estimated Volume of Spill (bbl.)
Rectangle A	117.0	33.0	0.50	4	3861.000	0.010	7.159	0.001	7.163
Rectangle B	54.0	9.0	0.50	3	486.000	0.014	1.202	0.001	1.202
Rectangle C					0.000	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
Rectangle D					0.000	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
Rectangle E					0.000	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
Rectangle F					0.000	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
Rectangle G					0.000	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
Rectangle H					0.000	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
Rectangle I					0.000	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
Released to Imaging: 9/15/2022 2:45:26 PM					0.000	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
Total Volume Release:									8.365

**District I**  
 1625 N. French Dr., Hobbs, NM 88240  
 Phone:(575) 393-6161 Fax:(575) 393-0720

**District II**  
 811 S. First St., Artesia, NM 88210  
 Phone:(575) 748-1283 Fax:(575) 748-9720

**District III**  
 1000 Rio Brazos Rd., Aztec, NM 87410  
 Phone:(505) 334-6178 Fax:(505) 334-6170

**District IV**  
 1220 S. St Francis Dr., Santa Fe, NM 87505  
 Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS

Action 122661

**CONDITIONS**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 122661
	Action Type: [C-141] Release Corrective Action (C-141)

**CONDITIONS**

Created By	Condition	Condition Date
jharimon	None	7/5/2022

Incident ID	
District RP	
Facility ID	
Application ID	

## Site Assessment/Characterization

*This information must be provided to the appropriate district office no later than 90 days after the release discovery date.*

What is the shallowest depth to groundwater beneath the area affected by the release?	_____ (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input type="checkbox"/> No

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

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

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

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

State of New Mexico  
Oil Conservation Division

Page 4

Incident ID	
District RP	
Facility ID	
Application ID	

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

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

Signature: Charles R. Beauvais II Date: \_\_\_\_\_

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

**OCD Only**

Received by: Jocelyn Harimon Date: 09/14/2022

Incident ID	
District RP	
Facility ID	
Application ID	

## Closure

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

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

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

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

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

Signature: Charles R. Beauvais II Date: \_\_\_\_\_

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

**OCD Only**

Received by: Jocelyn Harimon Date: 09/14/2022

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

Closure Approved by: Jennifer Nobui Date: \_\_\_\_\_

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

# **APPENDIX B**

## **Site Characterization Data**



# New Mexico Office of the State Engineer

## Water Column/Average Depth to Water

---

No records found.

**UTMNAD83 Radius Search (in meters):**

**Easting (X):** 639998.318

**Northing (Y):** 3614432

**Radius:** 800

---

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

---



# New Mexico Office of the State Engineer Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

(R=POD has been replaced, O=orphaned, C=the file is closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)  
(quarters are smallest to largest)

(NAD83 UTM in meters)

(In feet)

POD Number	POD Sub-Code	basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	Distance	Depth Well	Depth Water	Water Column
<a href="#">L 08234 S</a>	L	LE		4	4	1	18	19S	35E	640871	3614751*	929	106	60	46

Average Depth to Water: **60 feet**  
 Minimum Depth: **60 feet**  
 Maximum Depth: **60 feet**

**Record Count: 1**

**UTMNAD83 Radius Search (in meters):**

**Easting (X):** 639998.318

**Northing (Y):** 3614432

**Radius:** 1600

\*UTM location was derived from PLSS - see Help

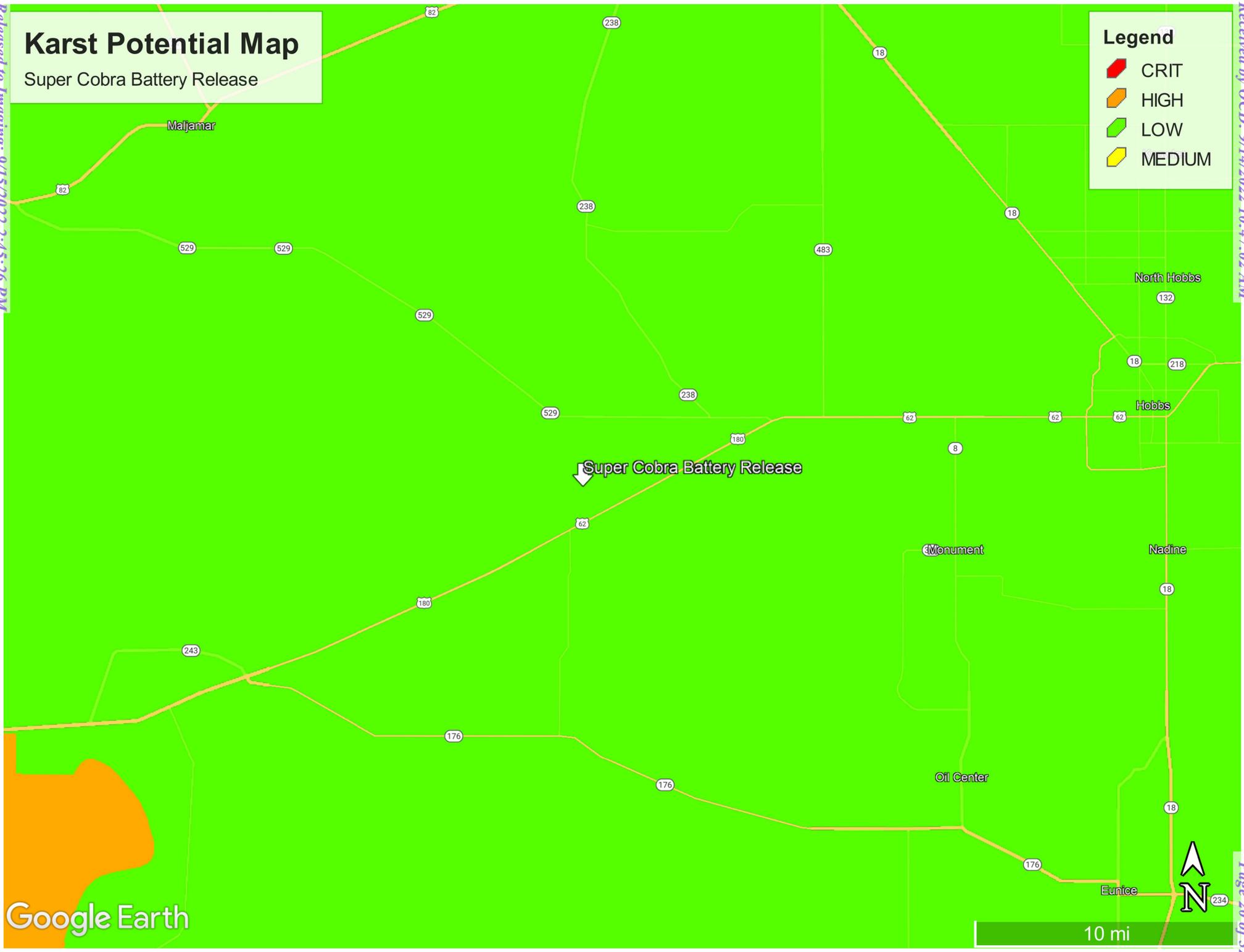
The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

# Karst Potential Map

Super Cobra Battery Release

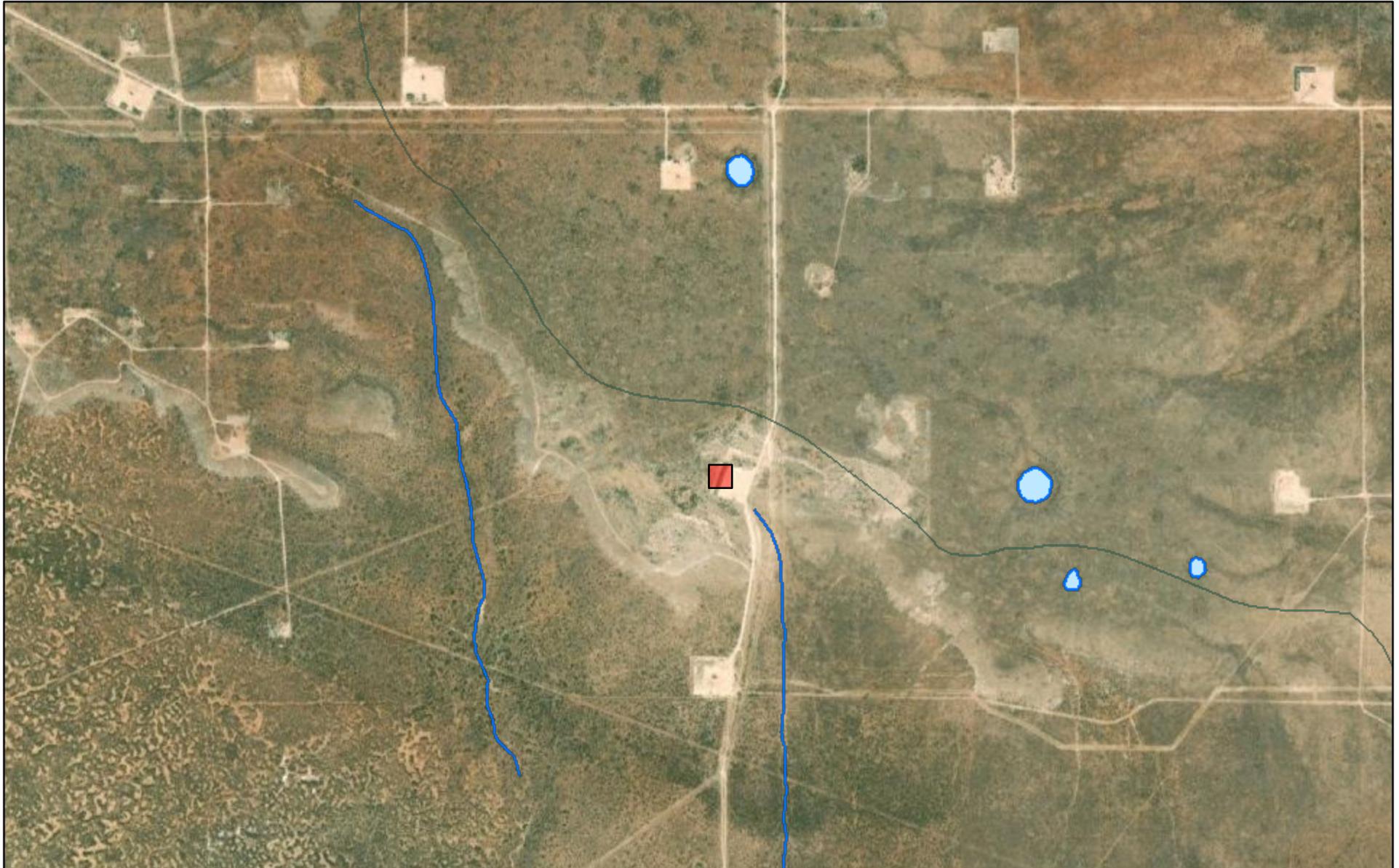
**Legend**

-  CRIT
-  HIGH
-  LOW
-  MEDIUM

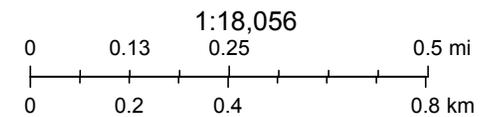


Google Earth

# New Mexico NFHL Data



August 26, 2022



FEMA, Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, Source: Esri, Maxar, Earthstar Geographics, and the GIS

[nmflood.org](http://nmflood.org) is made possible through a collaboration with NMDHSEM,

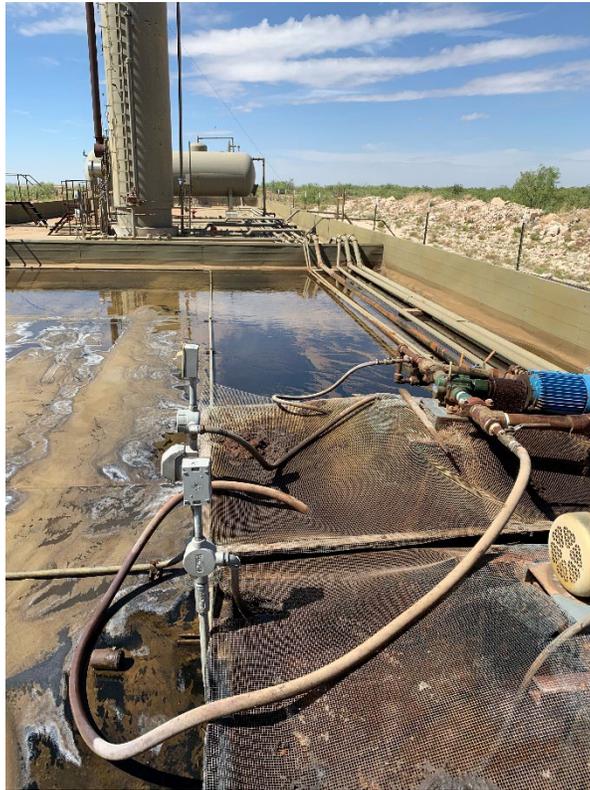
This is a non-regulatory product for informational use only. Please consult your local floodplain administrator for further information.

# **APPENDIX C**

## **Photographic Documentation**



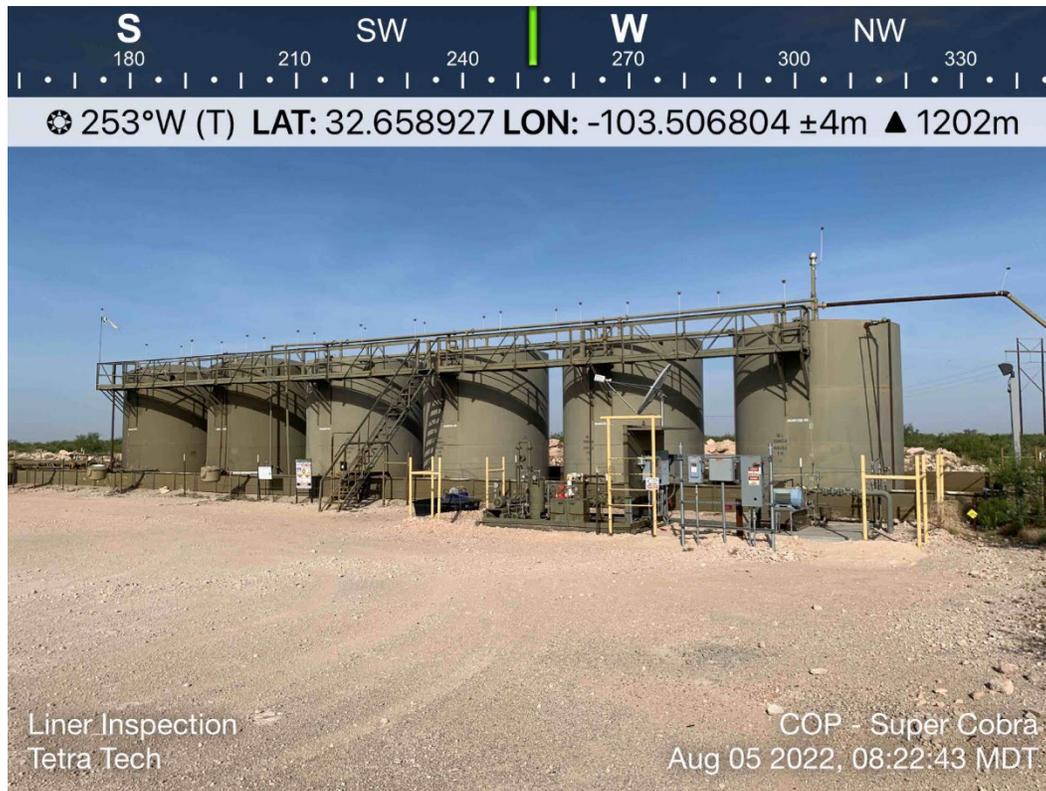
TETRA TECH, INC. PROJECT NO. 212C-MD-02810	DESCRIPTION	Initial response photo of release point provided by COP representatives onsite at that time.	1
	SITE NAME	ConocoPhillips Super Cobra Battery Valve Release	7/11/2022



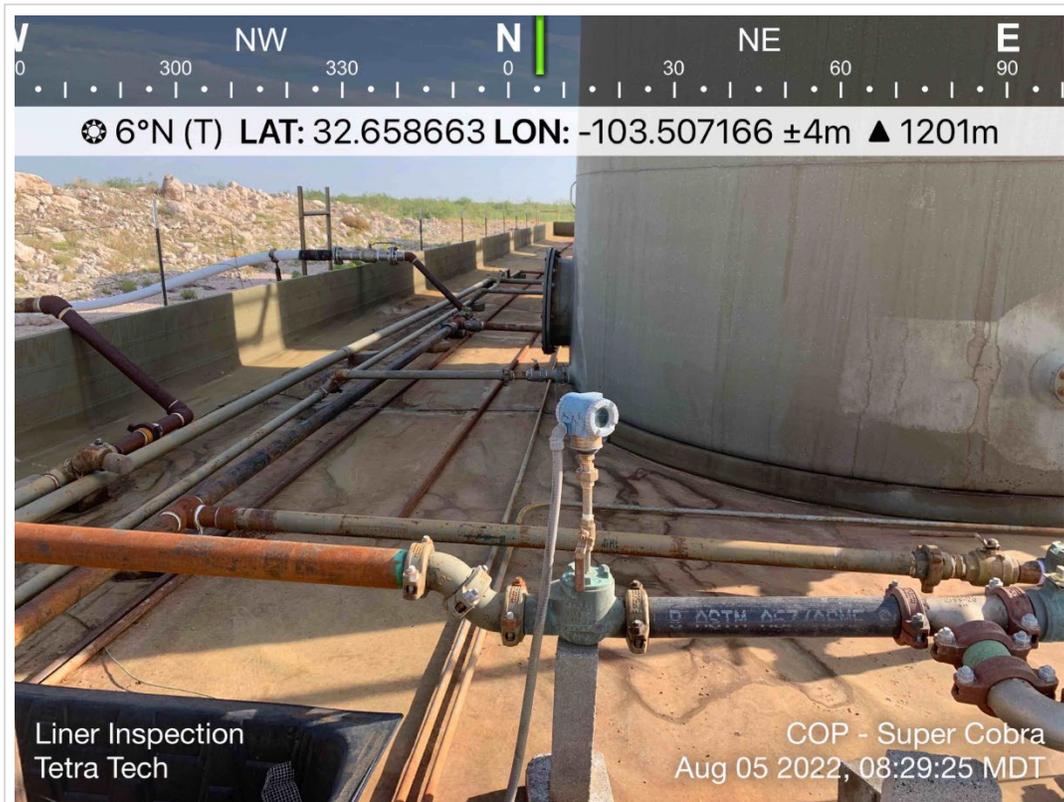
TETRA TECH, INC. PROJECT NO. 212C-MD-02810	DESCRIPTION	Initial response photo of release within the secondary containment provided by COP representatives onsite.	2
	SITE NAME	ConocoPhillips Super Cobra Battery Valve Release	7/11/2022



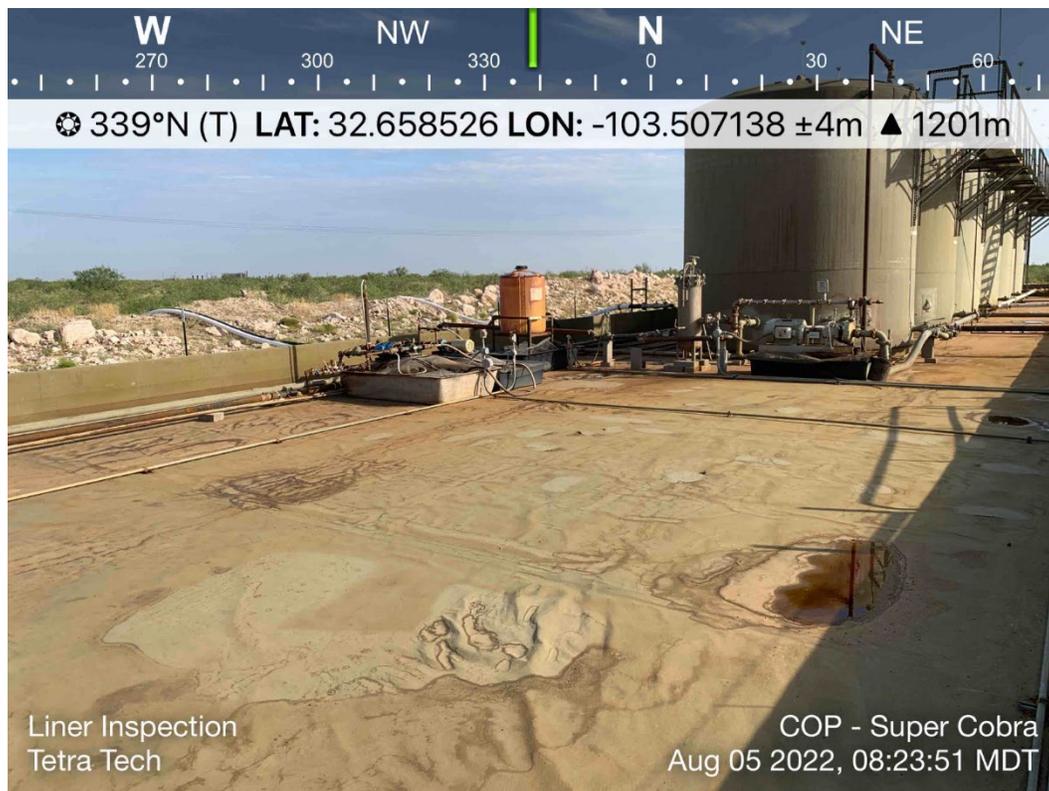
TETRA TECH, INC. PROJECT NO. 212C-MD-02810	DESCRIPTION	View of the Super Cobra Battery signage.	3
	SITE NAME	ConocoPhillips Super Cobra Battery Valve Release	8/05/2022



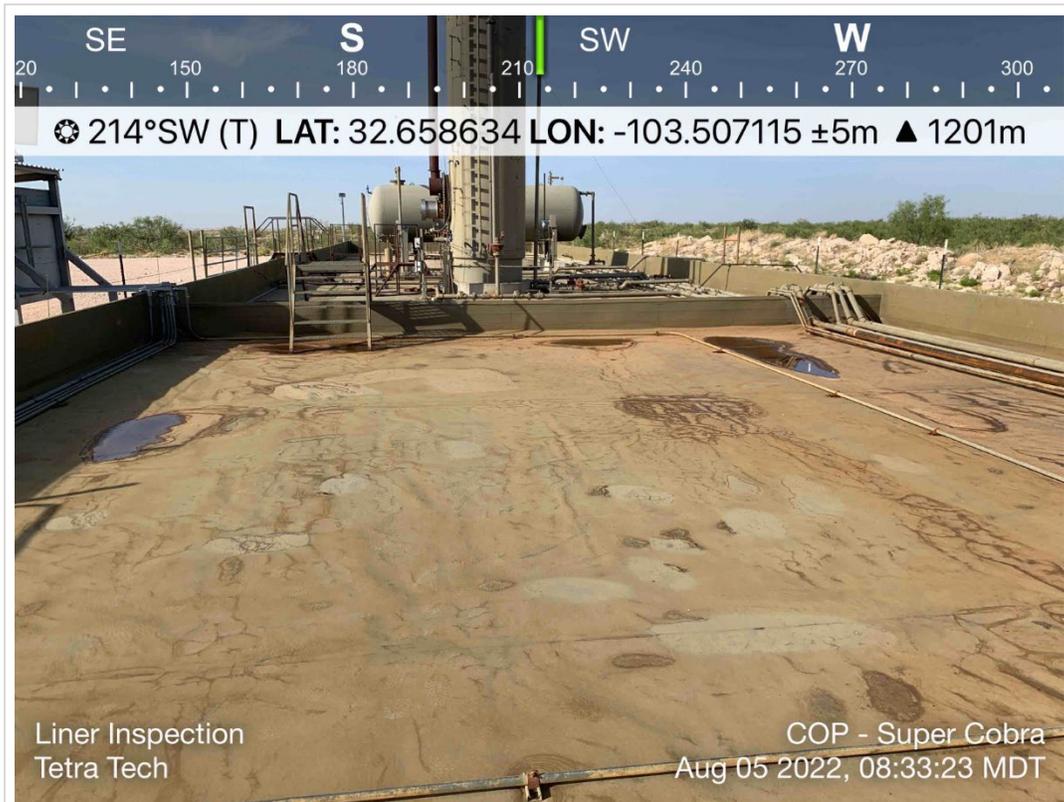
TETRA TECH, INC. PROJECT NO. 212C-MD-02810	DESCRIPTION	View West of the battery.	4
	SITE NAME	ConocoPhillips Super Cobra Battery Valve Release	8/05/2022



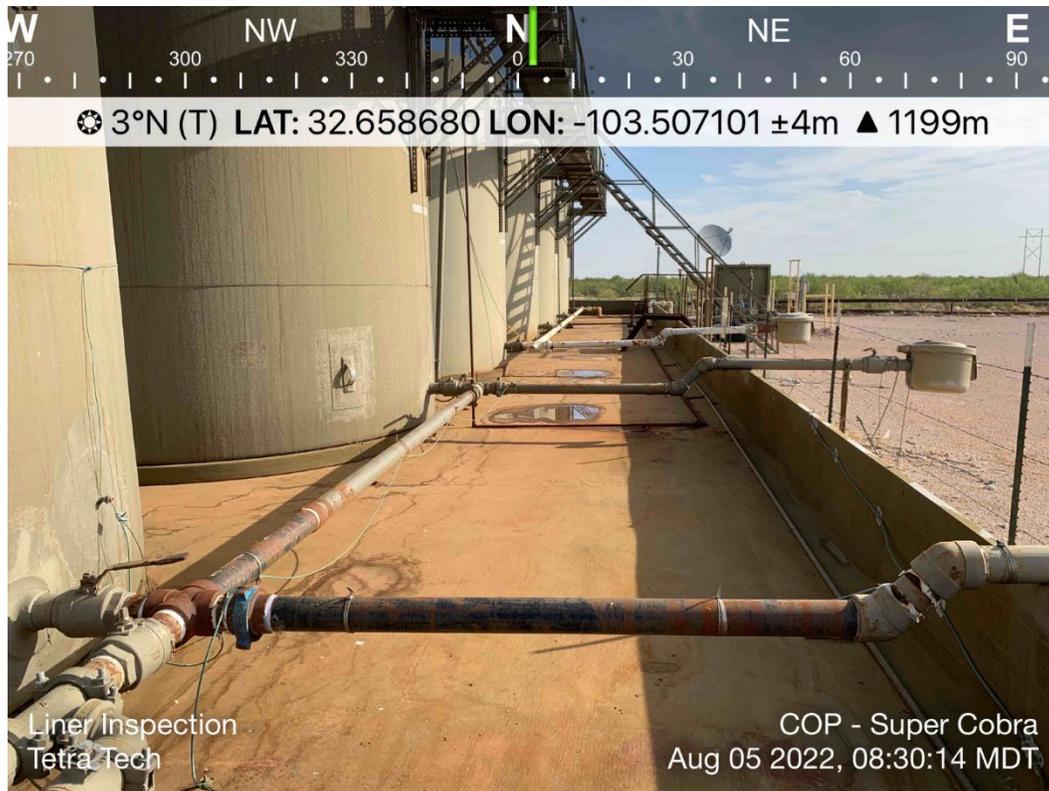
TETRA TECH, INC. PROJECT NO. 212C-MD-02810	DESCRIPTION	Release point area after valve replacement.	5
	SITE NAME	ConocoPhillips Super Cobra Battery Valve Release	8/05/2022



TETRA TECH, INC. PROJECT NO. 212C-MD-02810	DESCRIPTION	View inside the secondary containment of intact liner with no visual evidence of release remaining.	6
	SITE NAME	ConocoPhillips Super Cobra Battery Valve Release	8/11/2022



TETRA TECH, INC. PROJECT NO. 212C-MD-02810	DESCRIPTION	View inside the secondary containment of intact liner with no visual evidence of release remaining.	7
	SITE NAME	ConocoPhillips Super Cobra Battery Valve Release	8/05/2022



TETRA TECH, INC. PROJECT NO. 212C-MD-02810	DESCRIPTION	View inside the secondary containment of intact liner with no visual evidence of release remaining.	8
	SITE NAME	ConocoPhillips Super Cobra Battery Valve Release	8/05/2022



TETRA TECH, INC. PROJECT NO. 212C-MD-02810	DESCRIPTION	View inside the secondary containment of intact liner with no visual evidence of release remaining.	9
	SITE NAME	ConocoPhillips Super Cobra Battery Valve Release	8/05/2022



TETRA TECH, INC. PROJECT NO. 212C-MD-02810	DESCRIPTION	View inside the secondary containment of intact liner with no visual evidence of release remaining.	10
	SITE NAME	ConocoPhillips Super Cobra Battery Valve Release	8/05/2022

# **APPENDIX D**

## **Regulatory Correspondence**

**Tyler, Joe**

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**From:** Nobui, Jennifer, EMNRD <Jennifer.Nobui@state.nm.us>  
**Sent:** Tuesday, August 2, 2022 5:04 PM  
**To:** Tyler, Joe  
**Cc:** Bratcher, Mike, EMNRD; Hamlet, Robert, EMNRD; Harimon, Jocelyn, EMNRD  
**Subject:** FW: [EXTERNAL] Incident ID: NAPP2218128367 - Liner Inspection

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

Joe

Thank you for the notification. Please include a copy of this and all notifications in the remedial and/or closure reports to ensure the notifications are documented in the project file.

Thanks,  
Jennifer Nobui

---

**From:** Enviro, OCD, EMNRD <OCD.Enviro@state.nm.us>  
**Sent:** Tuesday, August 2, 2022 3:53 PM  
**To:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Nobui, Jennifer, EMNRD <Jennifer.Nobui@state.nm.us>; Harimon, Jocelyn, EMNRD <Jocelyn.Harimon@state.nm.us>; Velez, Nelson, EMNRD <Nelson.Velez@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>  
**Subject:** Fw: [EXTERNAL] Incident ID: NAPP2218128367 - Liner Inspection

---

**From:** Tyler, Joe <[Joe.Tyler@tetrattech.com](mailto:Joe.Tyler@tetrattech.com)>  
**Sent:** Tuesday, August 2, 2022 3:47 PM  
**To:** Enviro, OCD, EMNRD <[OCD.Enviro@state.nm.us](mailto:OCD.Enviro@state.nm.us)>  
**Cc:** Llull, Christian <[Christian.Llull@tetrattech.com](mailto:Christian.Llull@tetrattech.com)>  
**Subject:** [EXTERNAL] Incident ID: NAPP2218128367 - Liner Inspection

**CAUTION:** This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Incident ID (n#) **NAPP2218128367** (Super Cobra St Com #1 Battery Release)

To whom it may concern,

In accordance with Subsection A of 19.15.29.11 NMAC, the responsible party must verbally notify the appropriate division district office prior to conducting the liner inspection.

Thus, on behalf of ConocoPhillips for the above referenced incident, Tetra Tech is duly providing this communication which serves as notification that a liner inspection will be conducted at this site on August 5, 2022.

**NOTE:** If you have any questions regarding this schedule, please contact me.

---

**Joe Tyler** | Staff Geologist  
Mobile +1 (432) 210-6952 | Direct +1 (432) 687-8144 | [joe.tyler@tetrattech.com](mailto:joe.tyler@tetrattech.com)

**Tetra Tech** | *Leading with Science*<sup>®</sup> | OGA-Midland  
901 West Wall, Suite 100 | Midland, Texas | [tetrattech.com](http://tetrattech.com)

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Please consider the environment before printing. [Read more](#)



## Llull, Christian

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**From:** OCDOnline@state.nm.us  
**Sent:** Tuesday, September 13, 2022 4:23 PM  
**To:** Llull, Christian  
**Subject:** The Oil Conservation Division (OCD) has rejected the application, Application ID: 143012

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

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

The OCD has rejected the submitted *Application for administrative approval of a release notification and corrective action (C-141)*, for incident ID (n#) nAPP2218128367, for the following reasons:

- **A closure report cannot be reviewed without the corresponding C-141 closure pages. The OCD requires all C-141 pages to be completely filled out, signed and dated when submitting.**

The rejected C-141 can be found in the OCD Online: Permitting - Action Status, under the Application ID: 143012.

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

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

Thank you,  
Jocelyn Harimon  
Environmental Specialist  
575-748-1283  
Jocelyn.Harimon@state.nm.us

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

**District I**  
 1625 N. French Dr., Hobbs, NM 88240  
 Phone:(575) 393-6161 Fax:(575) 393-0720

**District II**  
 811 S. First St., Artesia, NM 88210  
 Phone:(575) 748-1283 Fax:(575) 748-9720

**District III**  
 1000 Rio Brazos Rd., Aztec, NM 87410  
 Phone:(505) 334-6178 Fax:(505) 334-6170

**District IV**  
 1220 S. St Francis Dr., Santa Fe, NM 87505  
 Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS

Action 143271

**CONDITIONS**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 143271
	Action Type: [C-141] Release Corrective Action (C-141)

**CONDITIONS**

Created By	Condition	Condition Date
jnobui	Closure Report Approved.	9/15/2022