



June 19, 2023

Ashley Maxwell
Projects Environmental Specialist
New Mexico Energy, Minerals, and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505

**RE: Revised Closure Report
ConocoPhillips
Heritage Concho
Federal 19 #001
Unit Letter A, Section 19, Township 23 South, Range 34 East
Lea County, New Mexico
Incident ID: nOY1715329950**

Ms. Maxwell:

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips to assess a Heritage Concho release associated with the former Federal 19 #001 well (associated API No. 30-025-24676). The release footprint is located in Public Land Survey System (PLSS) Unit Letter A, Section 19, Township 23 South, Range 34 East, in Lea County, New Mexico (Site). The approximate release point occurred at coordinates 32.2955856°, -103.5027542°, as shown on Figures 1 and 2.

BACKGROUND

According to the State of New Mexico Oil Conservation Division (NMOCD) C-141 Initial Report, the release occurred on May 31, 2017, when a two-inch nipple broke during a wellhead change out. Approximately 20 barrels (bbls) of produced water were released, of which 19 bbls were recovered with a vacuum truck. The release reportedly remained on the oil and gas operations pad. The NMOCD approved the initial C-141 on June 2, 2017 and subsequently assigned the release the Incident ID nOY1715329950 and the remediation permit (RP) number 1RP-4712. The initial C-141 form is included in Appendix A.

SITE CHARACTERIZATION

A site characterization was performed and no sinkholes, residences, schools, hospitals, institutions, churches, springs, private domestic water wells, playa lakes, stream bodies, 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.

There are no water wells listed in the New Mexico Office of the State Engineer (NMOSE) database located within approximately 0.5 miles (800 meters) of the Site. According to data from one well located approximately 0.95 miles (1,502 meters) from the Site, the minimum depth to groundwater is 330 feet below ground surface (bgs). The site characterization data are presented in Appendix B.

TETRA TECH

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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 site characterization and the lack of groundwater data within 0.5 miles of the release Site, 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+MRO)	100 mg/kg
BTEX	50 mg/kg
Benzene	10 mg/kg

INITIAL SITE ASSESSMENT AND 2019 CLOSURE REPORT

Tetra Tech had conducted the initial site assessment in 2017 on behalf of COG Operating LLC (Concho), which consisted of advancing three (3) trenches (T-1 through T-3) to total depths of 15 feet, 12 feet, and 10 feet below ground surface (bgs), respectively. Four (4) additional sample points (north, south, east, and west) were installed to depths of 1 feet bgs each. To obtain vertical delineation for chloride concentrations in the area of T-1, a borehole (BH-1) was advanced to a depth of 30 feet below surface. Figure 3 shows the approximate release extent and sample locations from the initial assessment. The results of the initial soil assessment are summarized in Table 1. Tetra Tech submitted a Work Plan Report to NMOCD, which was approved on May 1, 2018.

COG Operating LLC (Concho) conducted remedial activities in accordance with the approved Work Plan in December 2018. The impacted area in the vicinity of T-1 and T-3 was excavated to a depth of 4 feet bgs. A twenty (20) mil reinforced liner was installed at the base of the excavation. The impacted area in the vicinity of T-2 was excavated to a depth of 2 feet bgs. Confirmation samples were collected and analyzed for chlorides. The results of the confirmation sampling are summarized in Table 2. The 2018 excavation extent and confirmation sampling locations are presented in Figure 4.

Concho submitted a Closure Report dated March 12, 2019, which was rejected by NMOCD on December 14, 2022, with the following comments:

- *“Samples SW-1 and SW-6 exceed closure criteria.*
- *Follow up confirmation samples for “Soil Status Removed” areas were not collected. See the table in the submitted report for these locations.*
- *SW-1 appears to be along undeveloped Devon well sites that were reclaimed. Devon well sites 30-025-36065 and 30-025-34950.*
- *Historical documentation indicates that the pit was located in different location to the northwest of the release area. Refer to the online imaging for pit documentation. The document detailing pit location information was uploaded on 6/11/2003 (258 kB - 6/11/2003) and is located on page 8.*
- *Submit a work plan or closure report via the OCD permitting portal by March 17, 2023.”*

An extension request to June 17, 2023 was approved in an email dated April 3, 2023. A copy of the regulatory correspondence is included as Appendix C.

ADDITIONAL REMEDIATION ACTIVITIES AND CONFIRMATION SAMPLING

In May 2023, Tetra Tech personnel were onsite to complete remediation of the release based on the NMOCD rejection of the 2019 Closure Report, including excavation, disposal and backfill. The 4-foot excavation area was expanded to remove impacted soils in the area of SW-1, and a twenty (20) mil

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June 19, 2023

ConocoPhillips

reinforced liner was installed at the base of the excavation. The 2-foot excavation area was expanded to remove impacted soils in the area of SW-6. Photographs from the excavated areas prior to backfill are provided in Appendix D.

All of the excavated material was transported offsite for proper disposal. Approximately one hundred and twenty-six (126) cubic yards of material were transported to the R360 Halfway Facility in Hobbs, New Mexico. Copies of the waste manifests are included in Appendix E.

Prior to confirmation sampling, in accordance with Subsection D of 19.15.29.12 NMAC, the NMOCD district office was notified via email on May 23, 2023. Documentation of associated regulatory correspondence is included in Appendix C. On May 30, 2023, Tetra Tech personnel were onsite for confirmation sampling. Confirmation floor and sidewall samples were collected for laboratory analysis to verify that the impacted materials were properly removed. Each confirmation sample laboratory analytical result was directly compared to the proposed RRALs to demonstrate compliance.

Per the conditions of the NMOCD approval of the Work Plan, confirmation samples were collected such that each discrete sample (sidewall and floor) were representative of no more than 200 square feet of excavated area. A total of two (2) floor sample locations and six (6) sidewall sample locations were used during the remedial activities. Confirmation sidewall sample locations were labeled with "SW"-#, and confirmation floor sample locations were labeled with "FS"-#. Analytical results for all confirmation soil samples (floor and sidewall) were below the respective RRALs for chloride, BTEX, and TPH. The results of the May 2023 confirmation sampling events are summarized in Table 2. Laboratory analytical data is included in Appendix F. Excavated areas, depths and confirmation sample locations are shown in Figure 5.

CONCLUSION

ConocoPhillips respectfully requests closure of the release based on the confirmation sampling results and additional remediation activities performed. The final C-141 forms are enclosed in Appendix A. If you have any questions concerning the remediation activities for the Site, please call me at (512) 739-7874.

Sincerely,
Tetra Tech, Inc.



Samantha K. Abbott, P.G.
Project Manager



Christian M. Llull, P.G.
Program Manager

cc:
Mr. Moises H. Cantu Garcia, PBU – ConocoPhillips

LIST OF ATTACHMENTS

Figures:

- Figure 1 – Overview Map
- Figure 2 – Topographic Map
- Figure 3 – Initial Site Assessment (TT 2018)
- Figure 4 – Remediation Extent and Confirmation Sample Locations (COG)
- Figure 5 – Revised Remediation Extent and Confirmation Sample Locations (Tetra Tech)

Tables:

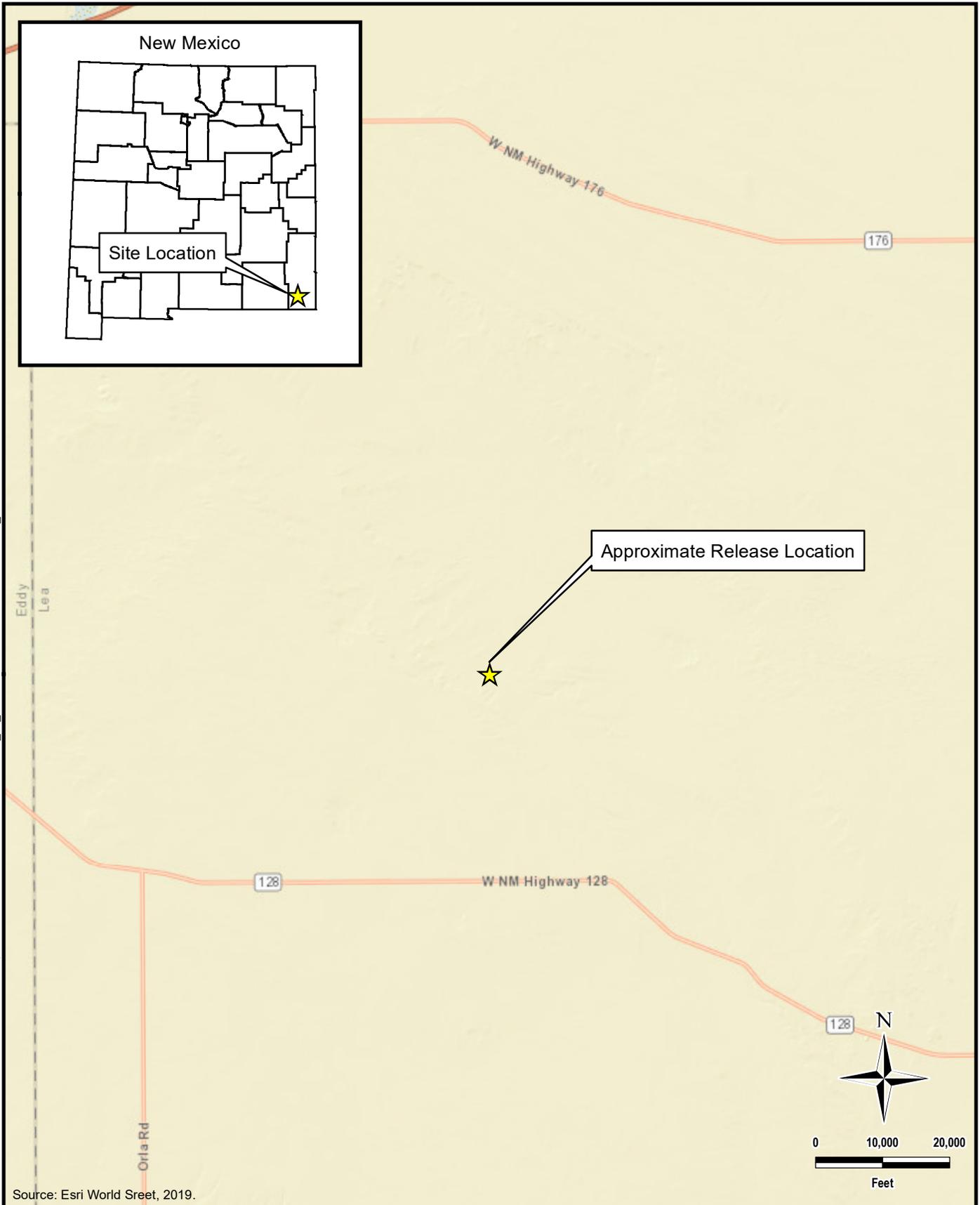
- Table 1 – Summary of Analytical Results – 2017 Initial Soil Assessment
- Table 2 – Summary of Analytical Results – 2018 COG Soil Remediation
- Table 3 – Summary of Analytical Results – 2023 TT Soil Remediation

Appendices:

- Appendix A – C-141 Forms
- Appendix B – Site Characterization Data
- Appendix C – Regulatory Correspondence
- Appendix D – Photographic Documentation
- Appendix E – Waste Manifests
- Appendix F – Laboratory Analytical Report

FIGURES

DOCUMENT PATH: C:\USERS\LISSA.VILLAMINONEDRIVE - TETRA TECH\INCDOCUMENTS\LUULLL\COP\FEDERAL_19_001\MXD\FIGURE 1 OVERVIEW MAP_FEDERAL_19 #001.MXD



Source: Esri World Sreet, 2019.



TETRA TECH

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CONOCOPHILLIPS

NOY1715329950
(32.2955856°, -103.5027542°)
LEA COUNTY, NEW MEXICO

**FEDERAL 19 #001
OVERVIEW MAP**

PROJECT NO.: 212C-MD-02300

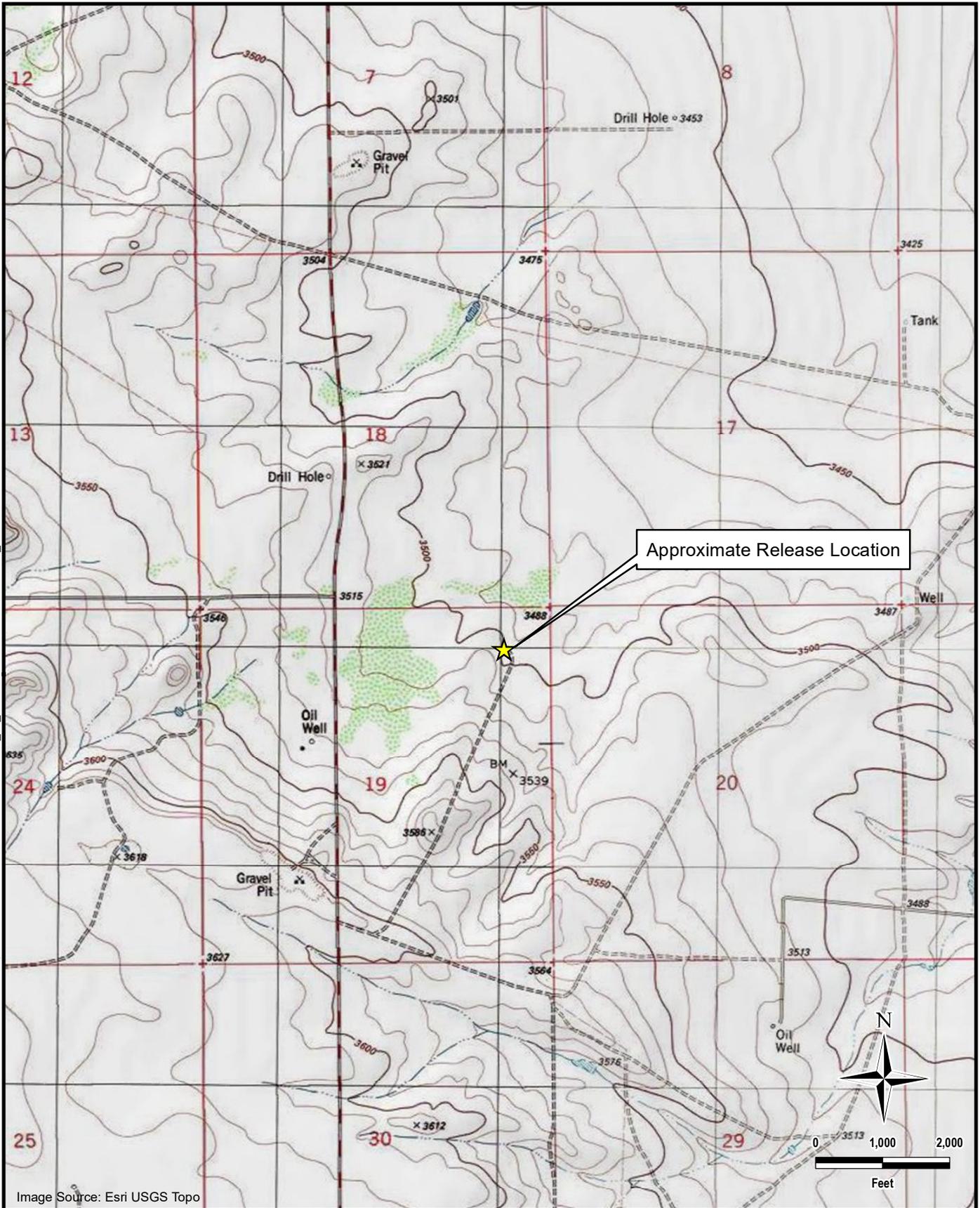
DATE: FEBRUARY 15, 2023

DESIGNED BY: LMV

Figure No.

1

DOCUMENT PATH: C:\USERS\LISSA.VILLAMONEDRIVE - TETRA TECH\INC\DOCUMENTS\ILLULLI\COP\FEDERAL_19_001\MXD\Figure 2 TOPO MAP_FEDERAL_19 #001.MXD



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CONOCOPHILLIPS

NOY1715329950
 (32.2955856°, -103.5027542°)
 LEA COUNTY, NEW MEXICO

**FEDERAL 19 #001
 TOPOGRAPHIC MAP**

PROJECT NO.: 212C-MD-0300

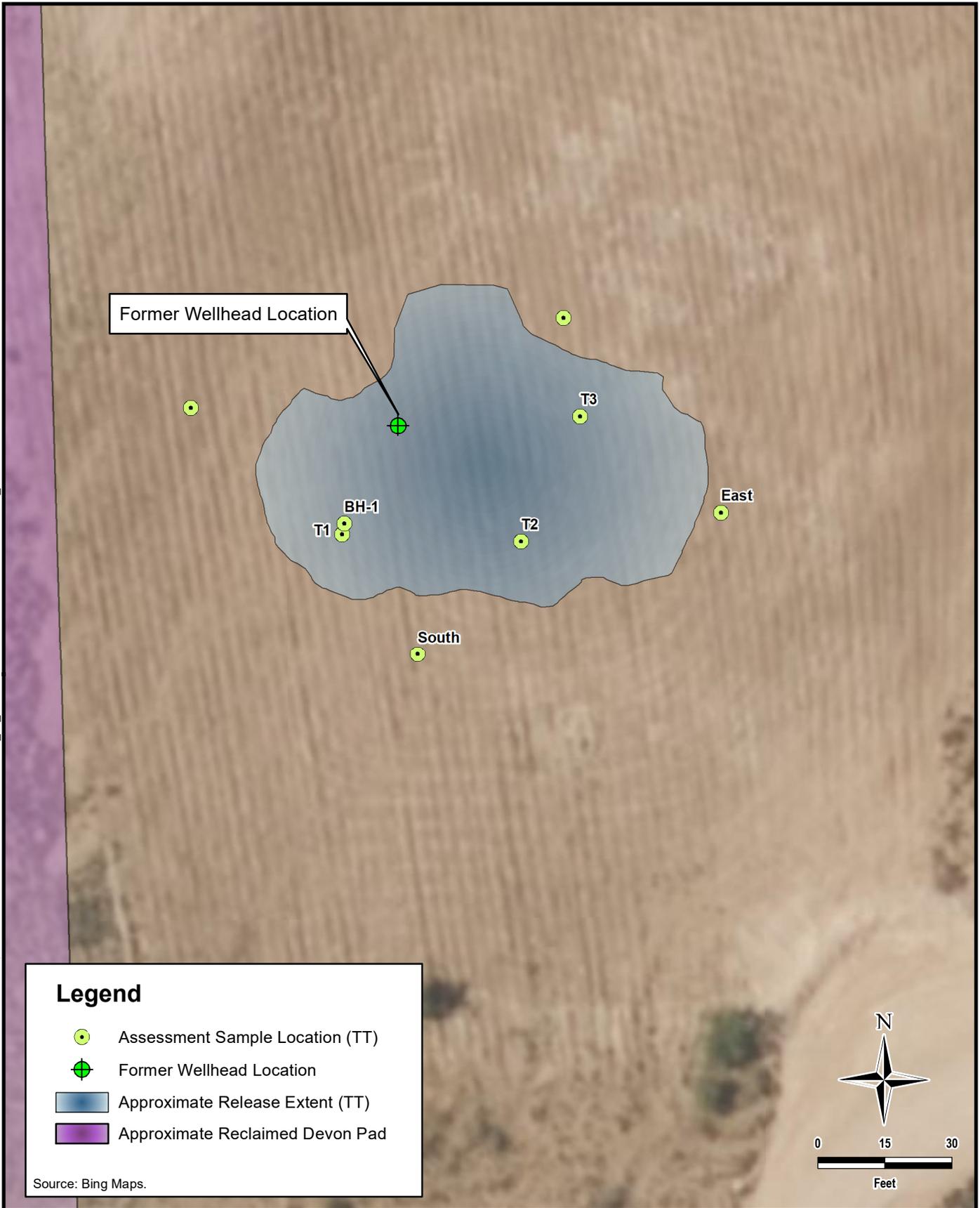
DATE: FEBRUARY 15, 2023

DESIGNED BY: LMV

Figure No.

2

DOCUMENT PATH: C:\USERS\LISSA.VILLAMINONE\DRIVE - TETRA TECH\INC\DOCUMENTS\11111\COP\FEDERAL_19_001\MXD\FIGURE 3 INITIAL ASSESSMENT_FEDERAL 19 #001.MXD



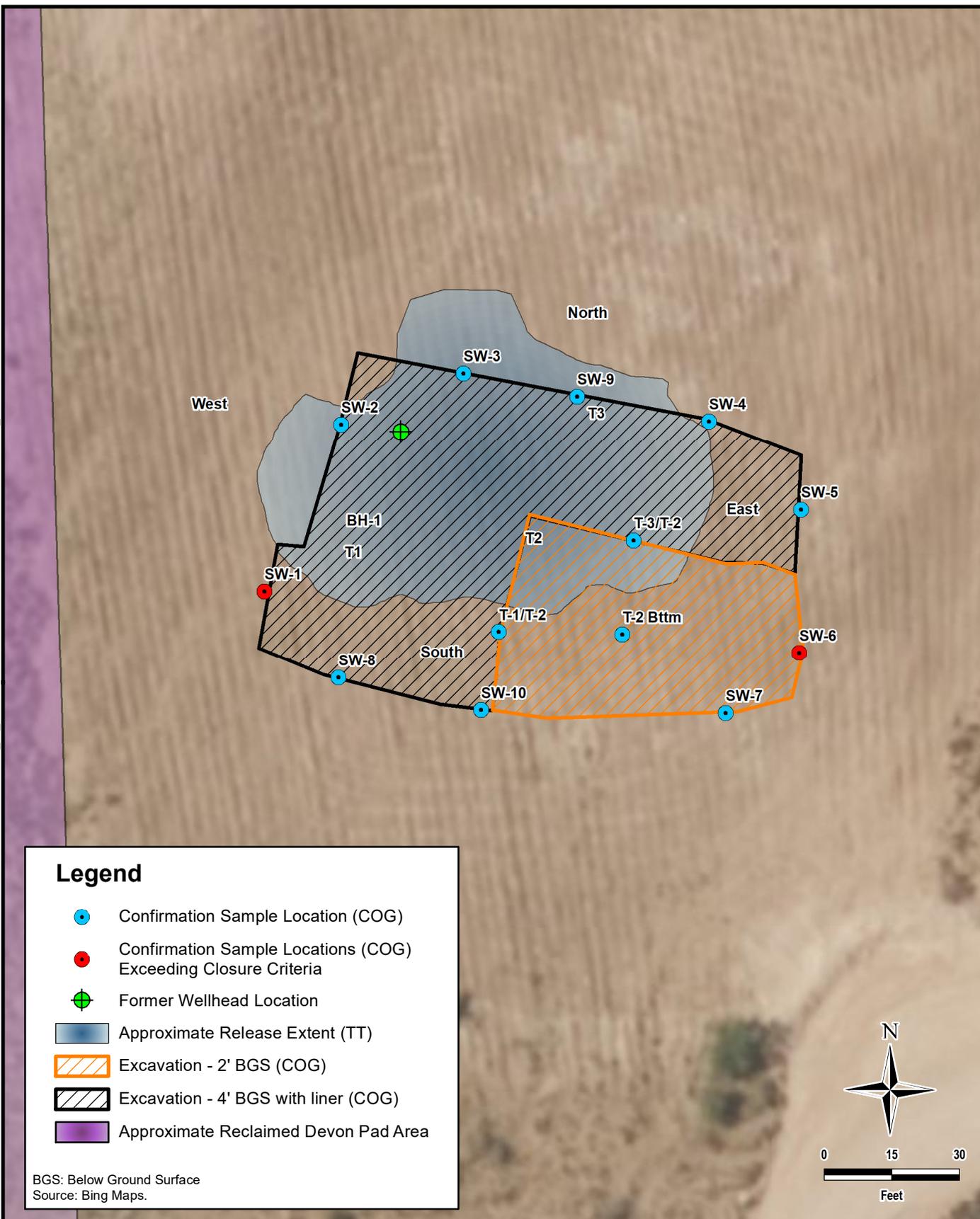
Legend

-  Assessment Sample Location (TT)
-  Former Wellhead Location
-  Approximate Release Extent (TT)
-  Approximate Reclaimed Devon Pad

Source: Bing Maps.

 TETRA TECH www.tetratech.com 901 West Wall Street, Suite 100 Midland, Texas 79701 Phone: (432) 682-4559 Fax: (432) 682-3946	CONOCOPHILLIPS NOY1715329950 (32.2955856°, -103.5027542°) LEA COUNTY, NEW MEXICO	PROJECT NO.: 212C-MD-0300 DATE: JUNE 12, 2023 DESIGNED BY: LMV
	FEDERAL 19 #001 INITIAL SITE ASSESSMENT (TT 2018)	Figure No. 3

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Legend

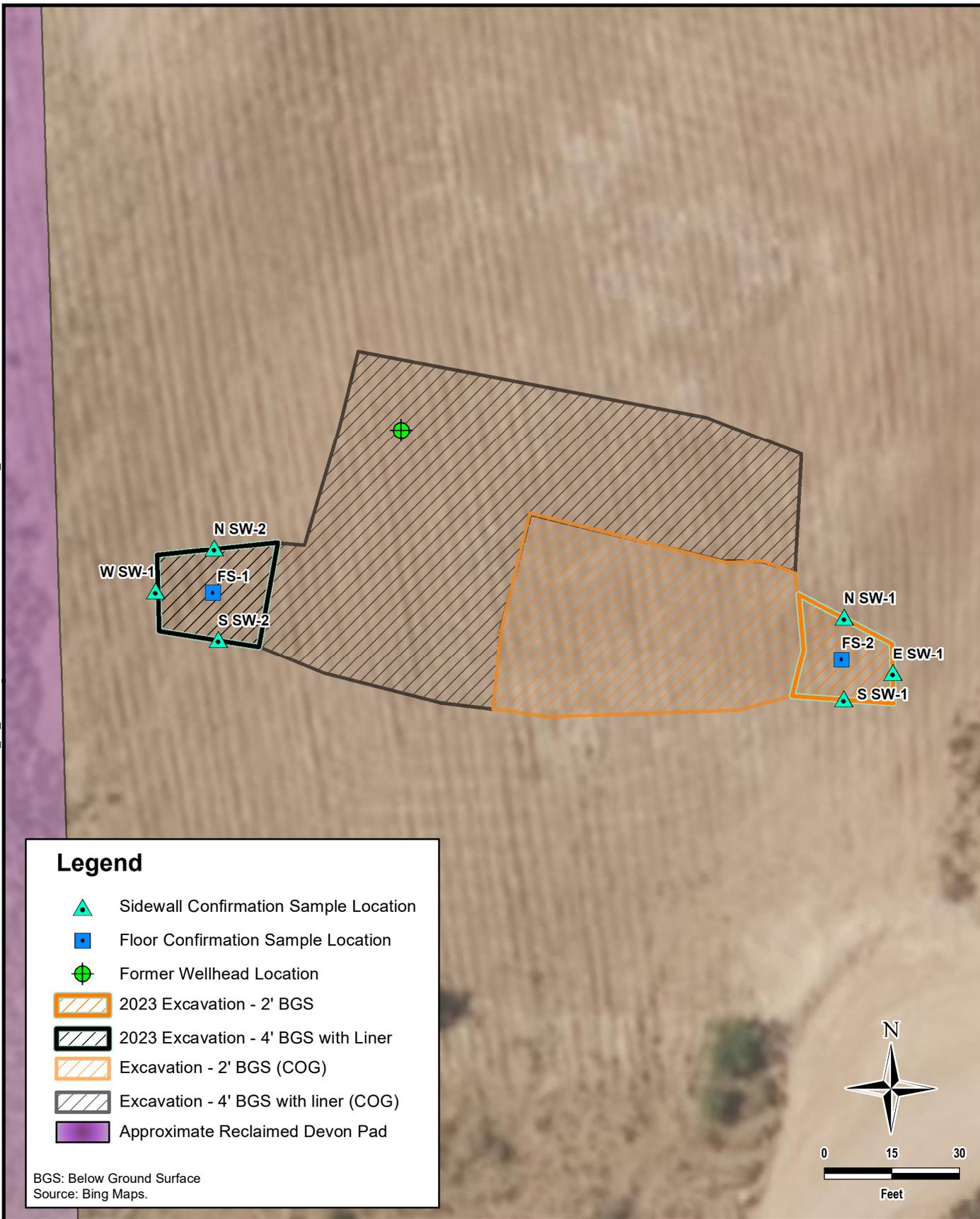
- Confirmation Sample Location (COG)
- Confirmation Sample Locations (COG) Exceeding Closure Criteria
- ⊕ Former Wellhead Location
- Approximate Release Extent (TT)
- Excavation - 2' BGS (COG)
- Excavation - 4' BGS with liner (COG)
- Approximate Reclaimed Devon Pad Area

BGS: Below Ground Surface
Source: Bing Maps.



 <p>TETRA TECH</p> <p>www.tetratech.com</p> <p>901 West Wall Street, Suite 100 Midland, Texas 79701 Phone: (432) 682-4559 Fax: (432) 682-3946</p>	<p>CONOCOPHILLIPS</p> <p>NOY1715329950 (32.2955856°, -103.5027542°) LEA COUNTY, NEW MEXICO</p>	<p>PROJECT NO.: 212C-MD-0300</p>
	<p>FEDERAL 19 #001</p> <p>REMEDIATION EXTENT AND CONFIRMATION SAMPLE LOCATIONS (COG)</p>	<p>DATE: JUNE 12, 2023</p> <p>DESIGNED BY: LMV</p>
		<p>Figure No.</p> <p>4</p>

DOCUMENT PATH: C:\USERS\LISSA.VILLAMINONE\DRIVE - TETRA TECH\INC\DOCUMENTS\11111\COPI\FEDERAL_19_001\MXD\FIGURE 5 REVISED REMEDIATION TT - FEDERAL_19 #001.MXD



Legend

- Sidewall Confirmation Sample Location
- Floor Confirmation Sample Location
- Former Wellhead Location
- 2023 Excavation - 2' BGS
- 2023 Excavation - 4' BGS with Liner
- Excavation - 2' BGS (COG)
- Excavation - 4' BGS with liner (COG)
- Approximate Reclaimed Devon Pad

BGS: Below Ground Surface
Source: Bing Maps.



<p>TETRA TECH</p> <p>www.tetratech.com</p> <p>901 West Wall Street, Suite 100 Midland, Texas 79701 Phone: (432) 682-4559 Fax: (432) 682-3946</p>	<p>CONOCOPHILLIPS</p> <p>NOY1715329950 (32.2955856°, -103.5027542°) LEA COUNTY, NEW MEXICO</p> <p>FEDERAL 19 #001</p> <p>REVISED REMEDIATION EXTENT AND CONFIRMATION SAMPLE LOCATIONS (TETRA TECH)</p>	<p>PROJECT NO.: 212C-MD-0300</p> <p>DATE: JUNE 12, 2023</p> <p>DESIGNED BY: LMV</p>
	<p>Figure No.</p> <p style="font-size: 24pt; text-align: center;">5</p>	

TABLES

TABLE 1
SUMMARY OF ANALYTICAL RESULTS
2017 INITIAL SOIL ASSESSMENT - nOY1715329950
HERITAGE CONCHO / CONOCOPHILLIPS
FEDERAL 19 #001
LEA COUNTY, NM

Sample ID	Sample Date	Sample Depth	Chloride ¹		BTEX ²												TPH ³									
					Benzene		Toluene		Ethylbenzene		m,p-Xylenes		o-Xylene		Total Xylenes		Total BTEX		GRO		DRO		ORO		Total TPH	
					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	mg/kg	Q
North	6/28/2017	SURFACE	136		<0.00199	U	<0.00199	U	<0.00199	U	<0.00398	U	<0.00199	U	<0.00199	U	<0.00199	U	<15.0	U	<15.0	U	<15.0	U	<15.0	U
		1	56.0		<0.00199	U	<0.00199	U	<0.00199	U	<0.00398	U	<0.00199	U	<0.00199	U	<0.00199	U	<15.0	U	<15.0	U	<15.0	U	<15.0	U
South	6/28/2017	SURFACE	51.3		<0.00201	U	<0.00201	U	<0.00201	U	<0.00402	U	<0.00201	U	<0.00201	U	<0.00201	U	<15.0	U	<15.0	U	<15.0	U	<15.0	U
		1	8.11		<0.00199	U	<0.00199	U	<0.00199	U	<0.00398	U	<0.00199	U	<0.00199	U	<0.00199	U	<15.0	U	<15.0	U	<15.0	U	<15.0	U
East	6/28/2017	SURFACE	77.8		<0.00200	U	<0.00200	U	<0.00200	U	<0.00399	U	<0.00200	U	<0.00200	U	<0.00200	U	111		931		92.5		1,130	
		1	175		<0.00202	U	<0.00202	U	<0.00202	U	<0.00403	U	<0.00202	U	<0.00202	U	<0.00202	U	<15.0	U	42.9		<15.0	U	42.9	
West	6/28/2017	SURFACE	92.3		<0.00199	U	<0.00199	U	<0.00199	U	<0.00398	U	<0.00199	U	<0.00199	U	<0.00199	U	<15.0	U	<15.0	U	<15.0	U	<15.0	U
		1	8.22		<0.00201	U	<0.00201	U	<0.00201	U	<0.00402	U	<0.00201	U	<0.00201	U	<0.00201	U	<15.0	U	<15.0	U	<15.0	U	<15.0	U
T1	6/28/2017	SURFACE	14,900		<0.00200	U	<0.00200	U	<0.00200	U	<0.00401	U	<0.00200	U	<0.00200	U	<0.00200	U	<15.0	U	46.3		<15.0	U	46.3	
		1	5,320		<0.00199	U	<0.00199	U	<0.00199	U	<0.00398	U	<0.00199	U	<0.00199	U	<0.00199	U	<15.0	U	86.9		<15.0	U	86.9	
		2	3,410		<0.00202	U	<0.00202	U	<0.00202	U	<0.00403	U	<0.00202	U	<0.00202	U	<0.00202	U	<15.0	U	<15.0	U	<15.0	U	<15.0	U
		3	2,660		<0.00202	U	<0.00202	U	<0.00202	U	<0.00404	U	<0.00202	U	<0.00202	U	<0.00202	U	<14.9	U	258		53.1		311	
		4	2,610		<0.00199	U	<0.00199	U	<0.00199	U	<0.00398	U	<0.00199	U	<0.00199	U	<0.00199	U	<15.0	U	<15.0	U	<15.0	U	<15.0	U
		5	1,520		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS	
		6	4,180		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS	
		8	4,100		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS	
		10	4,300		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS	
		12	5,110		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS	
T2	6/28/2017	SURFACE	6,610		<0.00201	U	<0.00201	U	<0.00201	U	<0.00402	U	<0.00201	U	<0.00201	U	<0.00201	U	<15.0	U	56.1		<15.0	U	56.1	
		1	859		<0.00200	U	<0.00200	U	<0.00200	U	<0.00399	U	<0.00200	U	<0.00200	U	<0.00200	U	<15.0	U	<15.0	U	<15.0	U	<15.0	U
		2	20.9		<0.00200	U	<0.00200	U	<0.00200	U	<0.00401	U	<0.00200	U	<0.00200	U	<0.00200	U	<15.0	U	<15.0	U	<15.0	U	<15.0	U
		3	16.3		<0.00202	U	<0.00202	U	<0.00202	U	<0.00403	U	<0.00202	U	<0.00202	U	<0.00202	U	<15.0	U	<15.0	U	<15.0	U	<15.0	U
		5	9.34		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS	
		8	21.0		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS	
T3	6/28/2017	SURFACE	20,200		<0.00198	U	<0.00198	U	<0.00198	U	<0.00396	U	<0.00198	U	<0.00198	U	<0.00198	U	<15.0	U	182		<15.0	U	182	
		1	2,850		<0.00200	U	<0.00200	U	<0.00200	U	<0.00401	U	<0.00200	U	<0.00200	U	<0.00200	U	<14.9	U	<14.9	U	<14.9	U	<14.9	U
		2	78.5		<0.00200	U	<0.00200	U	<0.00200	U	<0.00399	U	<0.00200	U	<0.00200	U	<0.00200	U	<15.0	U	<15.0	U	<15.0	U	<15.0	U
		3	118		<0.00199	U	<0.00199	U	<0.00199	U	<0.00398	U	<0.00199	U	<0.00199	U	<0.00199	U	<15.0	U	<15.0	U	<15.0	U	<15.0	U
		4	145		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS	
		5	112		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS	
BH-1	10/26/2017	0-1	392		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS	
		2-3	573		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS	
		4-5	60.9		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS	
		6-7	1,710		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS	
		9-10	2,220		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS	
		14-15	3,320		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS	
		19-20	349		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS	
		24-25	212		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS	
29-30	412		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS		NS			

NOTES:

- ft. Feet
- bgs Below ground surface
- mg/kg Milligrams per kilogram
- TPH Total Petroleum Hydrocarbons
- GRO Gasoline range organics
- DRO Diesel range organics
- ORO Oil Range Hydrocarbon
- NS Sample not analyzed for parameter
- 1 EPA Method 300.0
- 2 EPA Method 8021B
- 3 Method SW8015 Mod

Bold and italicized values indicate exceedance of proposed Remediation RRALS.

QUALIFIERS: U Analyte was not detected

TABLE 2
 SUMMARY OF ANALYTICAL RESULTS
 2018 COG SOIL REMEDIATION- nOY1715329950
 HERITAGE CONCHO / CONOCOPHILLIPS
 FEDERAL 19 #001
 LEA COUNTY, NM

Sample ID	Sample Date	Sample Depth	Chloride ¹	
			ft. bgs	mg/kg Q
SW-1	12/3/2018	-	3,200	
SW-2	12/3/2018	-	1,880	
	12/5/2018	-	256	
SW-3	12/3/2018	-	2,240	
	12/5/2018	-	816	
	12/11/2018	-	128	
SW-4	12/3/2018	-	560	
SW-5	12/3/2018	-	864	
	12/4/2018	-	560	
SW-6	12/3/2018	-	944	
	12/4/2018	-	624	
SW-7	12/3/2018	-	64.0	
SW-8	12/3/2018	-	80.0	
SW-9	12/5/2018	-	304	
SW-10	12/5/2018	-	320	
T-1/ T-2	12/4/2018	-	496	
T-3/ T-2	12/4/2018	-	384	
T-2 BOTTOM	12/4/2018	2	336	

NOTES:

- ft. Feet ***Bold and italicized values indicate exceedance of proposed RRALs.***
- 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

TABLE 3
 SUMMARY OF ANALYTICAL RESULTS
 2023 TT SOIL REMEDIATION - nOY1715329950
 HERITAGE CONCHO / CONOCOPHILLIPS
 FEDERAL 19 #001
 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	5/30/2023	4	1,440		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
NSW-2	5/30/2023	-	240		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		22.3		<10.0		22.3
WSW-1	5/30/2023	-	272		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		22.0		<10.0		22.0
SSW-2	5/30/2023	-	112		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
FS-2	5/30/2023	2	256		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
NSW-1	5/30/2023	-	160		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
ESW-1	5/30/2023	-	128		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
SSW-1	5/30/2023	-	176		<0.050		<0.050		<0.050		<0.150		<0.300		<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 SM4500C1-B
- 2 Method 8021B
- 3 Method 8015M

Bold and italicized values indicate exceedance of proposed RRALs.

Liner placed at the base of the 4-foot excavation in the vicinity of FS-1

QUALIFIERS:

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

Form C-141
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

OPERATOR Initial Report Final Report

Name of Company: COG Operating LLC OGRID # 229137	Contact: Robert McNeill
Address: 600 West Illinois Avenue, Midland TX 79701	Telephone No. 432-683-7443
Facility Name: Federal 19 #001	Facility Type: Wellhead

Surface Owner: State	Mineral Owner: Federal	API No. 30-025-24676
----------------------	------------------------	----------------------

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
A	19	23S	34E	660	North	660	East	Lea

Latitude 32.2955856 Longitude -103.5027542

NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: 20 bbls	Volume Recovered: 19 bbls
Source of Release: Wellhead	Date and Hour of Occurrence: May 31, 2017 5:00 pm	Date and Hour of Discovery: May 31, 2017 5:00 pm
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour:	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

RECEIVED
By Olivia Yu at 8:20 am, Jun 02, 2017

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

During a wellhead change out a two-inch nipple broke. The wellhead was changed out.

Describe Area Affected and Cleanup Action Taken.*

The release occurred on the pad. A vacuum truck was dispatched to remove all freestanding fluids. Concho will have the spill area sampled to delineate any possible impact from the release and we will present a remediation work plan to the NMOCD for approval prior to any significant 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 NMOCD 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 NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD 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.

Signature: <i>Rebecca Haskell</i>	OIL CONSERVATION DIVISION	
Printed Name: Rebecca Haskell	Approved by Environmental Specialist: <i>oy</i>	
Title: Senior HSE Coordinator	Approval Date: 6/2/2017	Expiration Date:
E-mail Address: rhaskell@concho.com	Conditions of Approval: see attached directive	Attached <input checked="" type="checkbox"/>
Date: June 1, 2017 Phone: 432-683-7443		

Attach Additional Sheets If Necessary

1RP-4712 nOY1715329950 pOY1715330523

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 not 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: *Moises H Cantu Garcia* Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

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: Moises H Cantu Garcia Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

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.

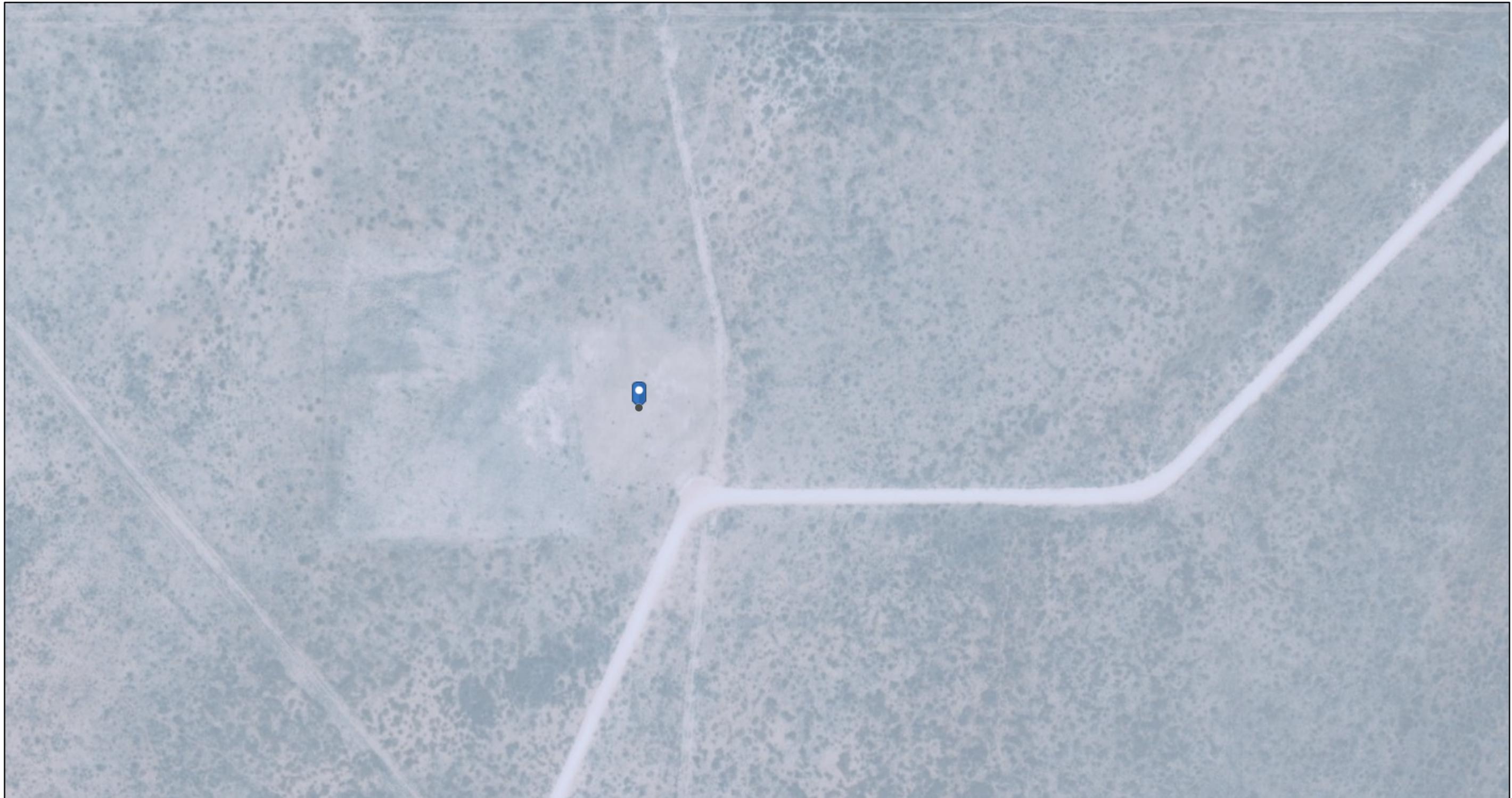
Closure Approved by: Ashley Maxwell Date: _____

Printed Name: _____ Title: _____

APPENDIX B

Site Characterization Data

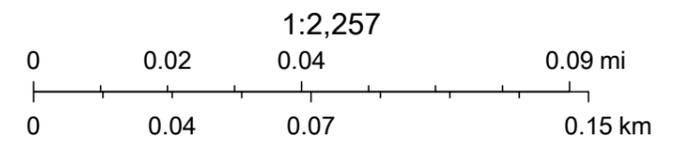
OCD Possible Karst Locations



1/27/2023, 4:26:01 PM

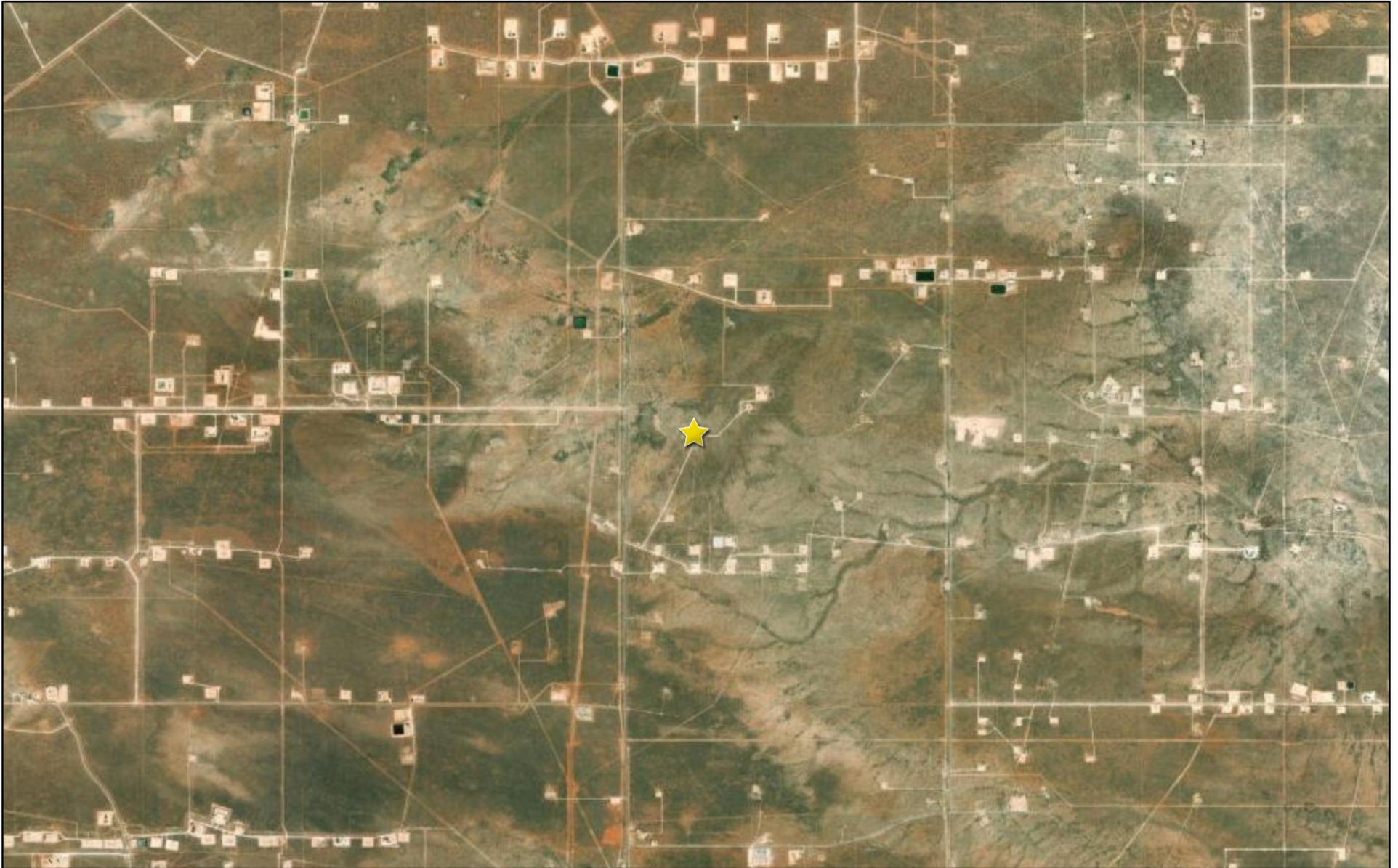
Karst Occurrence Potential

 Low



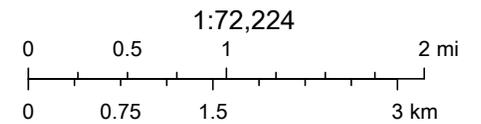
BLM, OCD, New Mexico Tech, Maxar, Microsoft, Esri, HERE, Garmin, iPC

Water Bodies



6/5/2023, 12:27:01 PM

★ Override 1



Earthstar Geographics, NM OSE



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
C 04667 POD1	CUB	LE		3	4	3	20	23S	34E	641770	3572915	1498			
C 04353 POD1	CUB	ED		4	2	2	24	23S	33E	639474	3574098	1502	603	330	273

Average Depth to Water: **330 feet**

Minimum Depth: **330 feet**

Maximum Depth: **330 feet**

Record Count: 2

UTMNAD83 Radius Search (in meters):

Easting (X): 640974.48

Northing (Y): 3574184.86

Radius: 1600

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.

APPENDIX C

Regulatory Correspondence

Chavira, Lisbeth

From: OCDOOnline@state.nm.us
Sent: Wednesday, December 14, 2022 3:35 PM
To: Beauvais, Charles R
Subject: [EXTERNAL]The Oil Conservation Division (OCD) has rejected the application, Application ID: 167070

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern (c/o Charles Beauvais for COG OPERATING LLC),

The OCD has rejected the submitted *Internal Manual Incident File Supporting Documentation (ENV)* (IM-BNF), for incident ID (n#) nOY1715329950, for the following reasons:

- **Samples SW-1 and SW-6 exceed closure criteria.**
- **Follow up confirmation samples for "Soil Status Removed" areas were not collected. See the table in the submitted report for these locations.**
- **SW-1 appears to be along undeveloped Devon well sites that were reclaimed. Devon well sites 30-025-36065 and 30-025-34950.**
- **Historical documentation indicates that the pit was located in different location to the northwest of the release area. Refer to the online imaging for pit documentation. The document detailing pit location information was uploaded on 6/11/2003 (258 kB - 6/11/2003) and is located on page 8.**
- **Submit a work plan or closure report via the OCD permitting portal by March 17, 2023.**

The rejected IM-BNF can be found in the OCD Online: Permitting - Action Status, under the Application ID: 167070. 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 IM-BNF.

Thank you,
Ashley Maxwell
Projects Environmental Specialist - A
505-635-5000
Ashley.Maxwell@emnrd.nm.gov

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

SUBMIT IN TRIPLICATE*
(Other instructions reverse side)

Form approved.
Budget Bureau No. 42-R1425.

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY

20-025-24676
5. LEASE DESIGNATION AND SERIAL NO.
NM 13365
6. IF INDIAN, ALLOTTEE OR TRIBE NAME

APPLICATION FOR PERMIT TO DRILL, DEEPEN, OR PLUG BACK

1a. TYPE OF WORK

DRILL

DEEPEN

PLUG BACK

b. TYPE OF WELL

OIL WELL

GAS WELL

OTHER

SINGLE ZONE

MULTIPLE ZONE

7. UNIT AGREEMENT NAME

8. FARM OR LEASE NAME

9. WELL NO.

2. NAME OF OPERATOR

CONTINENTAL OIL COMPANY

3. ADDRESS OF OPERATOR

P. O. Box 460, Hobbs, N.M. 88240

4. LOCATION OF WELL (Report location clearly and in accordance with any State requirements.)

At surface

660' FNL & 660' FEL of Sec. 19

At proposed prod. zone

Same

10. FIELD AND POOL, OR WILDERNESS

11. SEC., T., R., M., OR BLK. AND SURVEY OR AREA

12. COUNTY OR PARISH 13. STATE

13. DISTANCE FROM PROPOSED* LOCATION TO NEAREST PROPERTY OR LEASE LINE, FT.

(Also to nearest drlg. unit line, if any)

16. NO. OF ACRES IN LEASE

320

17. NO. OF ACRES ASSIGNED TO THIS WELL

160 40

18. DISTANCE FROM PROPOSED LOCATION* TO NEAREST WELL, DRILLING, COMPLETED, OR APPLIED FOR, ON THIS LEASE, FT.

19. PROPOSED DEPTH

8,730'

20. ROTARY OR CABLE TOOLS

Rotary

21. ELEVATIONS (Show whether DF, RT, GR, etc.)

3,500.3 BR

22. APPROX. DATE WORK WILL START*

3-14-74

23.

PROPOSED CASING AND CEMENTING PROGRAM

SIZE OF HOLE	SIZE OF CASING	WEIGHT PER FOOT	SETTING DEPTH	QUANTITY OF CEMENT
17 1/2"	13 3/8" H-40	48 lb	950'	620 sacks
11"	8 1/2" J-55	29, 32 lb	4,950'	475 sacks
7 1/8"	5 1/2" J-55	14, 15.5 lb	8,730'	550 sacks

It is proposed to drill a straight hole to a TD of 8,730' and complete as a Bone Springs Oil Well. Mud Program - 0'-950' 8.5-9.0# Spud mud; 950'-4,950' 9.5-10.2# Salt Sol.; 4,950'-8,730' 8.5# Treated Brack Water.

See attached for Blowout Preventer Program

IN ABOVE SPACE DESCRIBE PROPOSED PROGRAM: If proposal is to deepen or plug back, give data on present productive zone and proposed new productive zone. If proposal is to drill or deepen directionally, give pertinent data on subsurface locations and measured and true vertical depths. Give blowout preventer program, if any.

24.

SIGNED

Robert Gault III

TITLE Division Office Manager

DATE 2-1-74

(This space for Federal or State office use)

PERMIT NO.

APPROVAL DATE

APPROVED BY

TITLE

CONDITIONS OF APPROVAL, IF ANY:

APPROVED
FEB 8 1974
ARTHUR R. BROWN
DISTRICT ENGINEER

*See Instructions On Reverse Side

USGS-6, file

RECEIVED

FELLSVILLE

OIL CONSERVATION (68-00)

HOBBY, W. H.

NEW MEXICO OIL CONSERVATION COMMISSION
WELL LOCATION AND ACREAGE DEDICATION PLAT

Form O-112
Supersedes O-112
Effective 1-1-68

All distances must be from the outer boundaries of the Section

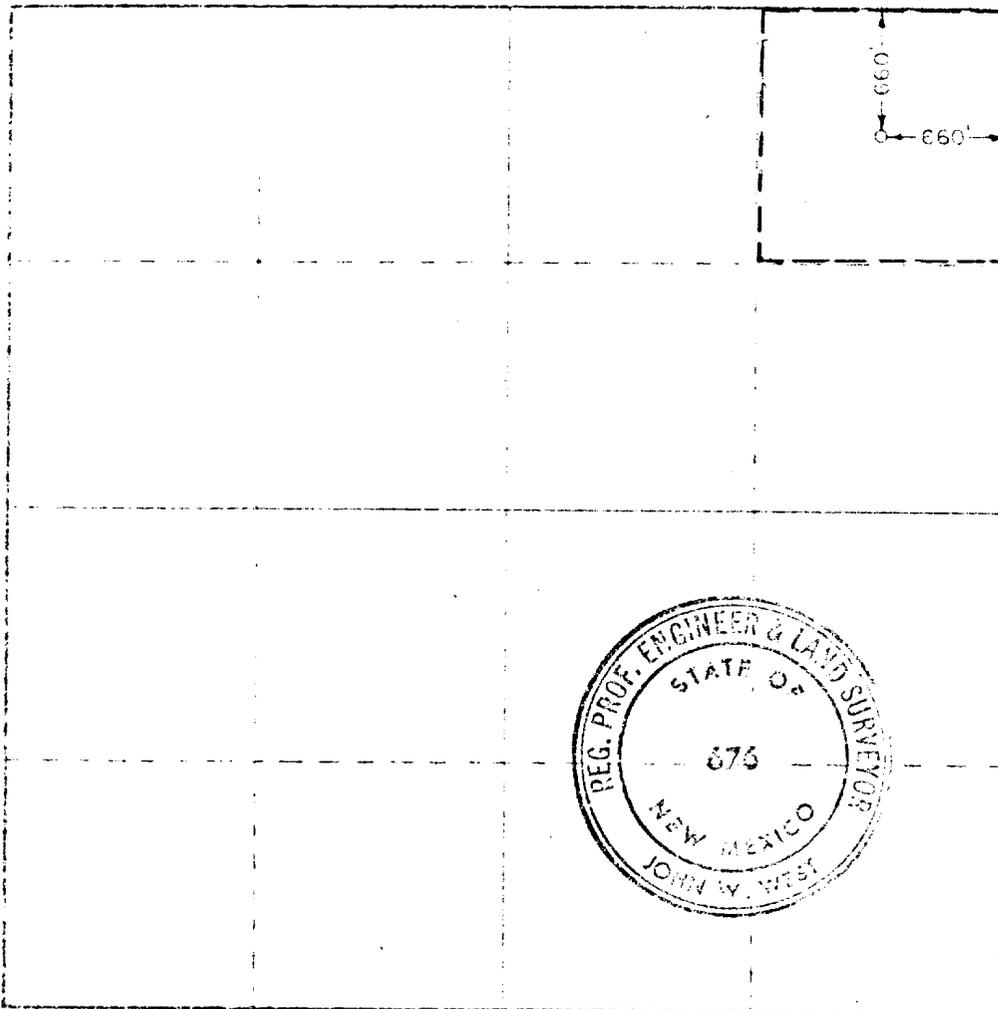
Operator CONTINENTAL OIL COMPANY		Lessee MADDOX 19			Well No. 1
Section A	Section 19	Township 23 SOUTH	Range 34 EAST	County LEA	
Tract: Part of the Containing of Well: 660 feet from the NORTH side and 660 feet from the EAST side					
Ground Level Elev 3500.3	Producing Formation Bone Springs		Under Bone Springs		Dedicated Acreage 100 40

1. Outline the acreage dedicated to the subject well by colored pencil or hachure marks on the plat below
2. If more than one lease is dedicated to the well, outline each and identify the ownership thereof (both as to working interest and royalty)
3. If more than one lease of different ownership is dedicated to the well, have the interests of all owners been consolidated by communitization, unitization, force-pooling etc?

Yes No If answer is "yes" type of consolidation _____

If answer is "no" list the owners and tract descriptions which have actually been consolidated. (Use reverse side of this form if necessary.) _____

No allowable well be assigned to the well until all interests have been consolidated (by communitization, unitization, forced-pooling or otherwise) or until a non-standard unit, eliminating such interests, has been approved by the Commission.



CERTIFICATION

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.

Robert Gault III

Division Office Manager

Continental Oil Co.

February 1, 1974

I hereby certify that the well location shown on this plat was plotted from the notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my knowledge and belief.

Date Surveyed

January 9, 1974

Registered Professional Engineer and Land Surveyor

John W. West

675

312 64 67 342 1000 104 2317 2647 2736 1800 1000 500

RECEIVED

JUN 14 2024

WIL CONSERVATION COMM.
HOBBBS, N. H.

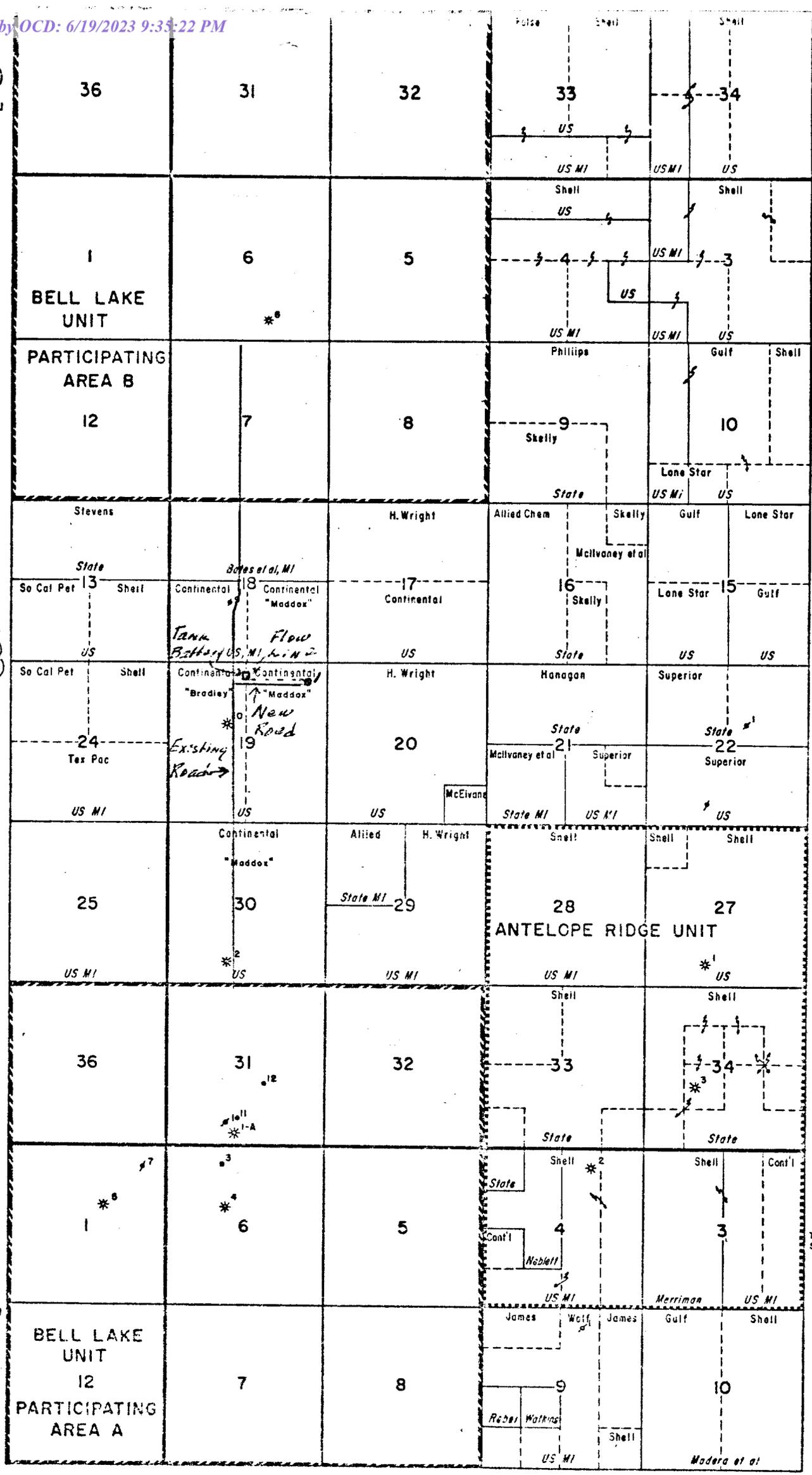
Development Plan For Surface Use

1. Existing roads including location of the exit from the main highway
See Attached Map
2. Planned access roads
See Below and Attached Map
(a) Length and width of new road *12' X 2400'* (b) Roads will be compacted ~~or surfaced~~
3. Location of existing wells
See Attached Map
4. Lateral roads to well location
See Attached Map
5. Location of tank batteries and flowlines
See Attached Map
6. Location and type of water supply
(X) Water will be hauled to location ~~() See attached map for location of proposed water lines~~
7. Methods for handling waste disposal
All litter and scrap material will be disposed of by burying in a trash pit with a minimum cover of 24 inches of dirt.
8. and 9. Location of camps and airstrips
There are no camps or airstrips contemplated to serve this lease.
10. Location of layout to include position of the rig, mud tanks, reserve pits, burn pits, pipe racks, etc.
See Below and Attached plat
(a) Size of drilling pad (b) Drilling pad compacted ~~or surfaced~~
11. Plans for restoration of the surface
Surface will be levelled and properly conditioned.
12. Other information that may be used in evaluating the impact on environment
The terrain in this area is generally flat with very little vegetation. No streams or other major water sheds are located in this area.

22
S

23
S

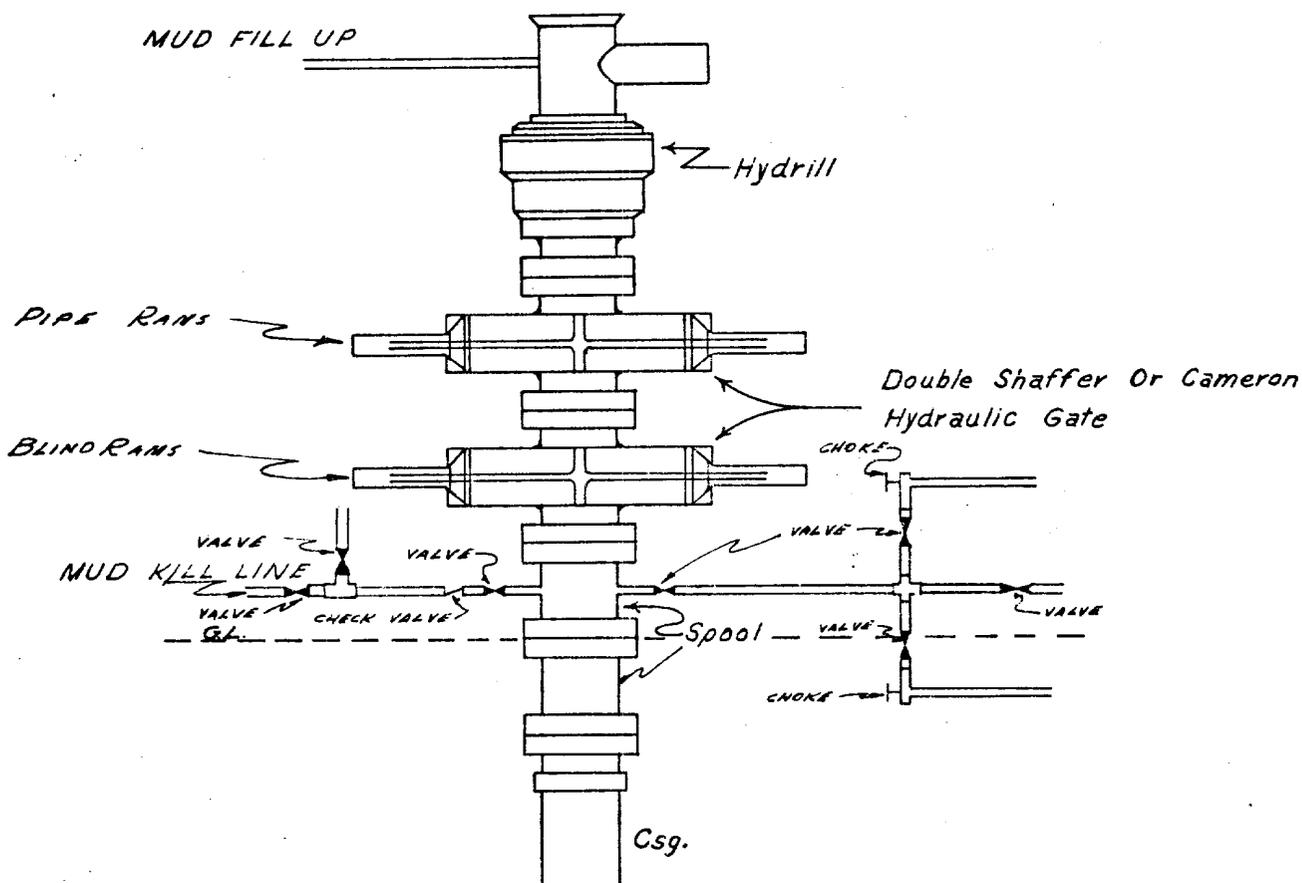
24
S



R33E R34E Maddox 19 No. 1

CONTINENTAL OIL COMPANY
Blow-out Preventer Specifications

MADDOX "19" WELL No. 1



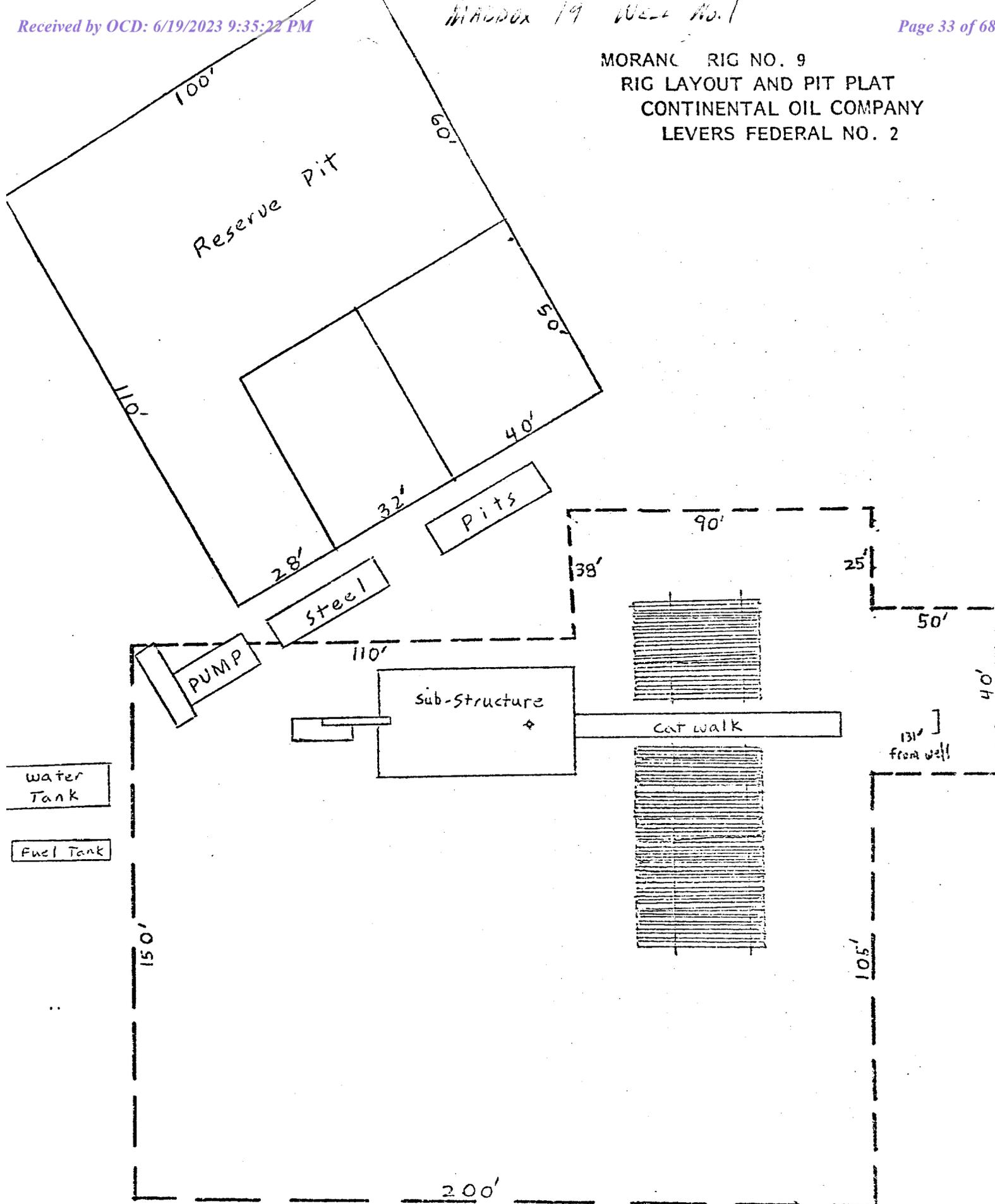
NOTE:

Manual and Hydraulic controls with closing unit no less than 75' from well head.
Remote controls on rig floor.

DRAWING B

RFL

MORAN RIG NO. 9
RIG LAYOUT AND PIT PLAT
CONTINENTAL OIL COMPANY
LEVERS FEDERAL NO. 2



From: [Maxwell, Ashley, EMNRD](#)
To: [Abbott, Sam](#)
Subject: RE: [EXTERNAL] FW: [EXTERNAL]The Oil Conservation Division (OCD) has rejected the application, Application ID: 167070
Date: Monday, April 3, 2023 2:36:56 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

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

Good Afternoon,

Your extension request until June 17, 2023, has been approved.

Thanks,
Ashley

Ashley Maxwell • Environmental Specialist
Environmental Bureau Projects Group
EMNRD - Oil Conservation Division
1000 Rio Brazos Road | Aztec, NM 87110
505.635.5000 | Ashley.Maxwell@emnrd.nm.gov
<http://www.emnrd.state.nm.us/OCD/>

From: Abbott, Sam <Sam.Abbott@tetrattech.com>
Sent: Friday, March 31, 2023 3:23 PM
To: Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>
Cc: Beauvais, Charles R <Charles.R.Beauvais@conocophillips.com>
Subject: [EXTERNAL] FW: [EXTERNAL]The Oil Conservation Division (OCD) has rejected the application, Application ID: 167070

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

Good afternoon Ms. Maxwell,

On behalf of ConocoPhillips, Tetra Tech is requesting a 90-day extension (until June 17, 2023) to complete additional remediation activities and associated reporting for the Federal 19 #001 Release site (**nOY1715329950**).

ConocoPhillips recently received a large volume of NMOCD determinations related to unresolved releases from ConocoPhillips' predecessor-in-interest ("COG") via the *Internal Manual Incident File Supporting Documentation (ENV)* (IM-BNF) process.

Given the difficulties inherent with available resource allocation for several projects with similar deadlines within a short period of time, this extension is required to safely complete the additional

remediation. ConocoPhillips plans to conduct the additional remediation in the coming month however, and once the confirmation sampling data is collected, tabulated, and evaluated, a closure report will be submitted to the OCD.

Furthermore, I am looking to confirm that we can proceed with the additional remediation at this Site without first submitting a revised work plan for approval, is that correct?

Thank you, and have a great weekend!

Samantha Abbott, PG | Project Manager
Direct Mobile +1 (512) 739-7874 | Business +1 (512) 338-1667 | Sam.Abbott@tetrattech.com

Tetra Tech, Inc. | *Leading with Science*[®] | OGA
8911 N Capital of Texas Hwy #2310 | Austin, TX 78759 | tetrattech.com

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



From: OCDOnline@state.nm.us <OCDOnline@state.nm.us>
Sent: Wednesday, December 14, 2022 3:35 PM
To: Beauvais, Charles R <Charles.R.Beauvais@conocophillips.com>
Subject: [EXTERNAL]The Oil Conservation Division (OCD) has rejected the application, Application ID: 167070

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern (c/o Charles Beauvais for COG OPERATING LLC),

The OCD has rejected the submitted *Internal Manual Incident File Supporting Documentation (ENV)* (IM-BNF), for incident ID (n#) nOY1715329950, for the following reasons:

- **Samples SW-1 and SW-6 exceed closure criteria.**
- **Follow up confirmation samples for "Soil Status Removed" areas were not collected. See the table in the submitted report for these locations.**
- **SW-1 appears to be along undeveloped Devon well sites that were reclaimed. Devon well sites 30-025-36065 and 30-025-34950.**
- **Historical documentation indicates that the pit was located in different location to the northwest of the release area. Refer to the online imaging for pit documentation. The document detailing pit location information was uploaded on 6/11/2003 (258 kB -**

6/11/2003) and is located on page 8.

- **Submit a work plan or closure report via the OCD permitting portal by March 17, 2023.**

The rejected IM-BNF can be found in the OCD Online: Permitting - Action Status, under the Application ID: 167070.

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 IM-BNF.

Thank you,

Ashley Maxwell

Projects Environmental Specialist - A

505-635-5000

Ashley.Maxwell@emnrd.nm.gov

New Mexico Energy, Minerals and Natural Resources Department

1220 South St. Francis Drive

Santa Fe, NM 87505

From: [Maxwell, Ashley, EMNRD](#)
To: [Abbott, Sam](#)
Subject: RE: [EXTERNAL] FW: [EXTERNAL]The Oil Conservation Division (OCD) has rejected the application, Application ID: 167070
Date: Wednesday, April 5, 2023 2:06:57 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

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

Good Afternoon,

If nothing is changing other than the timeline for completion of the project, a revised work plan is not required to be submitted for this release.

Thanks,
Ashley

Ashley Maxwell • Environmental Specialist
Environmental Bureau Projects Group
EMNRD - Oil Conservation Division
1000 Rio Brazos Road | Aztec, NM 87110
505.635.5000 | Ashley.Maxwell@emnrd.nm.gov
<http://www.emnrd.state.nm.us/OCD/>

From: Abbott, Sam <Sam.Abbott@tetrattech.com>
Sent: Wednesday, April 5, 2023 12:54 PM
To: Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>
Subject: RE: [EXTERNAL] FW: [EXTERNAL]The Oil Conservation Division (OCD) has rejected the application, Application ID: 167070

Thank you, Ashley. Can you confirm that ConocoPhillips may proceed with the additional remediation at this Site without first submitting a revised work plan for approval?

Samantha Abbott, PG | Project Manager
Direct Mobile +1 (512) 739-7874 | Business +1 (512) 338-1667 | Sam.Abbott@tetrattech.com

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8911 N Capital of Texas Hwy #2310 | Austin, TX 78759 | tetrattech.com

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



From: Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>
Sent: Monday, April 3, 2023 2:37 PM
To: Abbott, Sam <Sam.Abbott@tetratech.com>
Subject: RE: [EXTERNAL] FW: [EXTERNAL]The Oil Conservation Division (OCD) has rejected the application, Application ID: 167070

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

Good Afternoon,

Your extension request until June 17, 2023, has been approved.

Thanks,
Ashley

Ashley Maxwell • Environmental Specialist
Environmental Bureau Projects Group
EMNRD - Oil Conservation Division
1000 Rio Brazos Road | Aztec, NM 87110
505.635.5000 | Ashley.Maxwell@emnrd.nm.gov
<http://www.emnrd.state.nm.us/OCD/>

From: Abbott, Sam <Sam.Abbott@tetratech.com>
Sent: Friday, March 31, 2023 3:23 PM
To: Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>
Cc: Beauvais, Charles R <Charles.R.Beauvais@conocophillips.com>
Subject: [EXTERNAL] FW: [EXTERNAL]The Oil Conservation Division (OCD) has rejected the application, Application ID: 167070

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

Good afternoon Ms. Maxwell,

On behalf of ConocoPhillips, Tetra Tech is requesting a 90-day extension (until June 17, 2023) to complete additional remediation activities and associated reporting for the Federal 19 #001 Release site (**nOY1715329950**).

ConocoPhillips recently received a large volume of NMOCD determinations related to unresolved releases from ConocoPhillips' predecessor-in-interest ("COG") via the *Internal Manual Incident File Supporting Documentation (ENV)* (IM-BNF) process.

Given the difficulties inherent with available resource allocation for several projects with similar deadlines within a short period of time, this extension is required to safely complete the additional remediation. ConocoPhillips plans to conduct the additional remediation in the coming month

however, and once the confirmation sampling data is collected, tabulated, and evaluated, a closure report will be submitted to the OCD.

Furthermore, I am looking to confirm that we can proceed with the additional remediation at this Site without first submitting a revised work plan for approval, is that correct?

Thank you, and have a great weekend!

Samantha Abbott, PG | Project Manager
Direct Mobile +1 (512) 739-7874 | Business +1 (512) 338-1667 | Sam.Abbott@tetrattech.com

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



From: OCDOnline@state.nm.us <OCDOnline@state.nm.us>
Sent: Wednesday, December 14, 2022 3:35 PM
To: Beauvais, Charles R <Charles.R.Beauvais@conocophillips.com>
Subject: [EXTERNAL]The Oil Conservation Division (OCD) has rejected the application, Application ID: 167070

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern (c/o Charles Beauvais for COG OPERATING LLC),

The OCD has rejected the submitted *Internal Manual Incident File Supporting Documentation (ENV)* (IM-BNF), for incident ID (n#) nOY1715329950, for the following reasons:

- **Samples SW-1 and SW-6 exceed closure criteria.**
- **Follow up confirmation samples for "Soil Status Removed" areas were not collected. See the table in the submitted report for these locations.**
- **SW-1 appears to be along undeveloped Devon well sites that were reclaimed. Devon well sites 30-025-36065 and 30-025-34950.**
- **Historical documentation indicates that the pit was located in different location to the northwest of the release area. Refer to the online imaging for pit documentation. The document detailing pit location information was uploaded on 6/11/2003 (258 kB - 6/11/2003) and is located on page 8.**

- **Submit a work plan or closure report via the OCD permitting portal by March 17, 2023.**

The rejected IM-BNF can be found in the OCD Online: Permitting - Action Status, under the Application ID: 167070.

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 IM-BNF.

Thank you,

Ashley Maxwell

Projects Environmental Specialist - A

505-635-5000

Ashley.Maxwell@emnrd.nm.gov

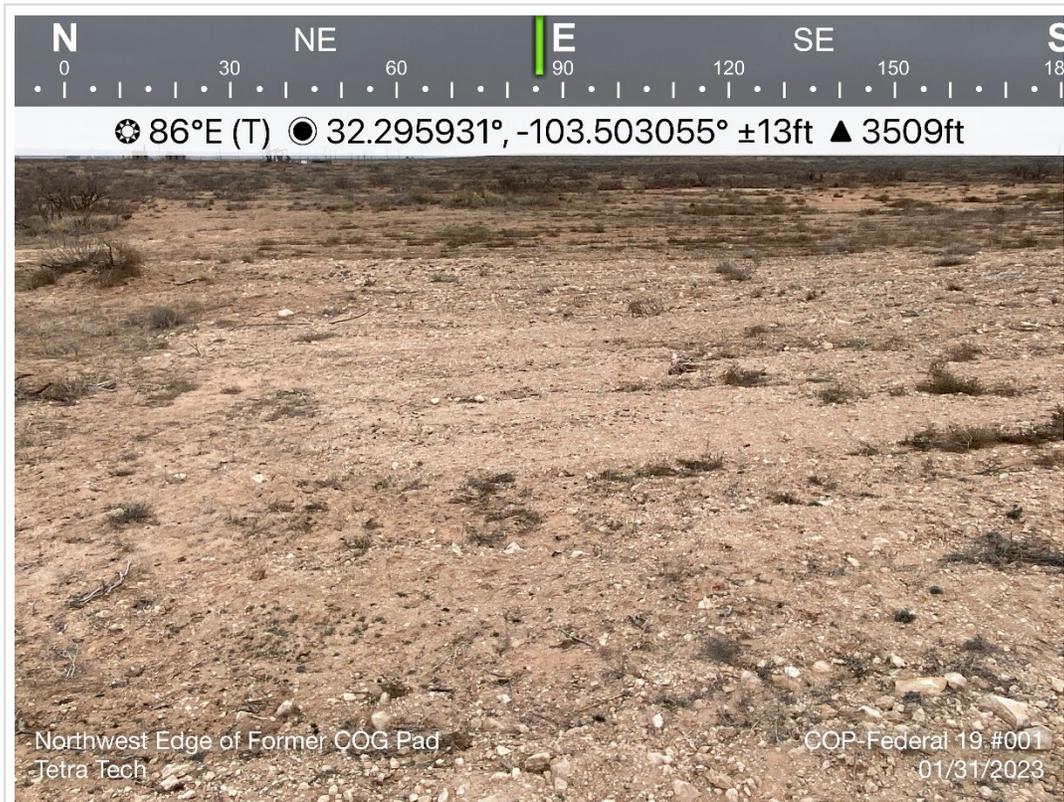
New Mexico Energy, Minerals and Natural Resources Department

1220 South St. Francis Drive

Santa Fe, NM 87505

APPENDIX D

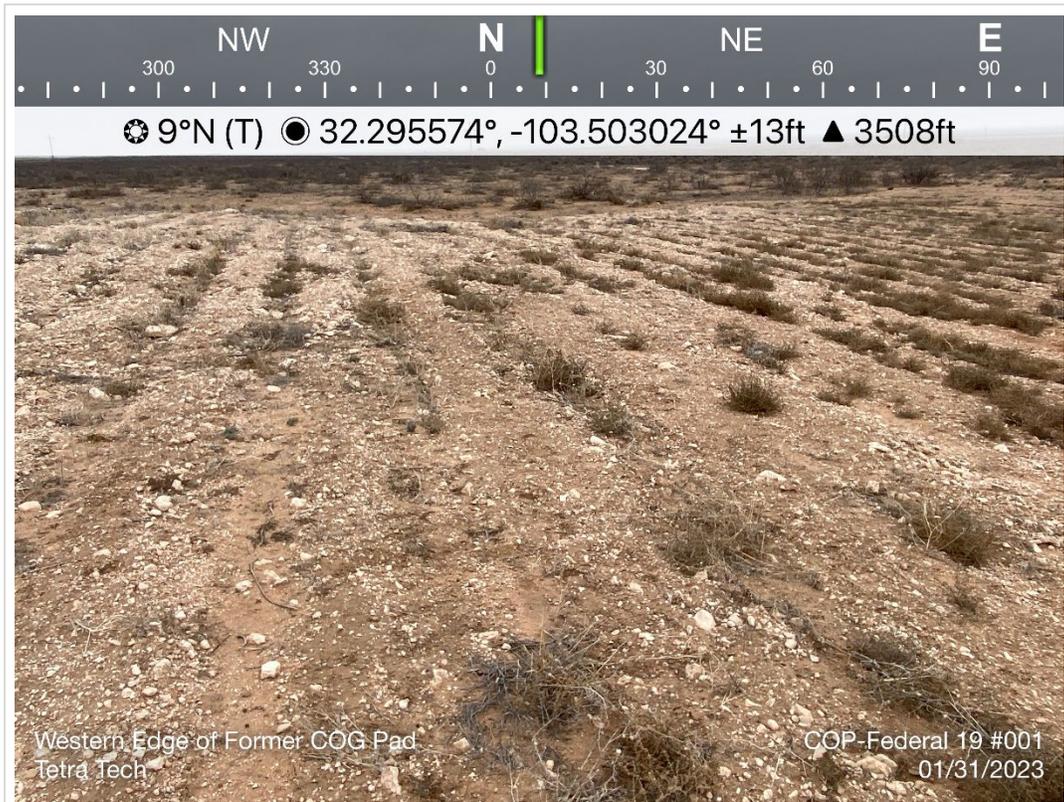
Photographic Documentation



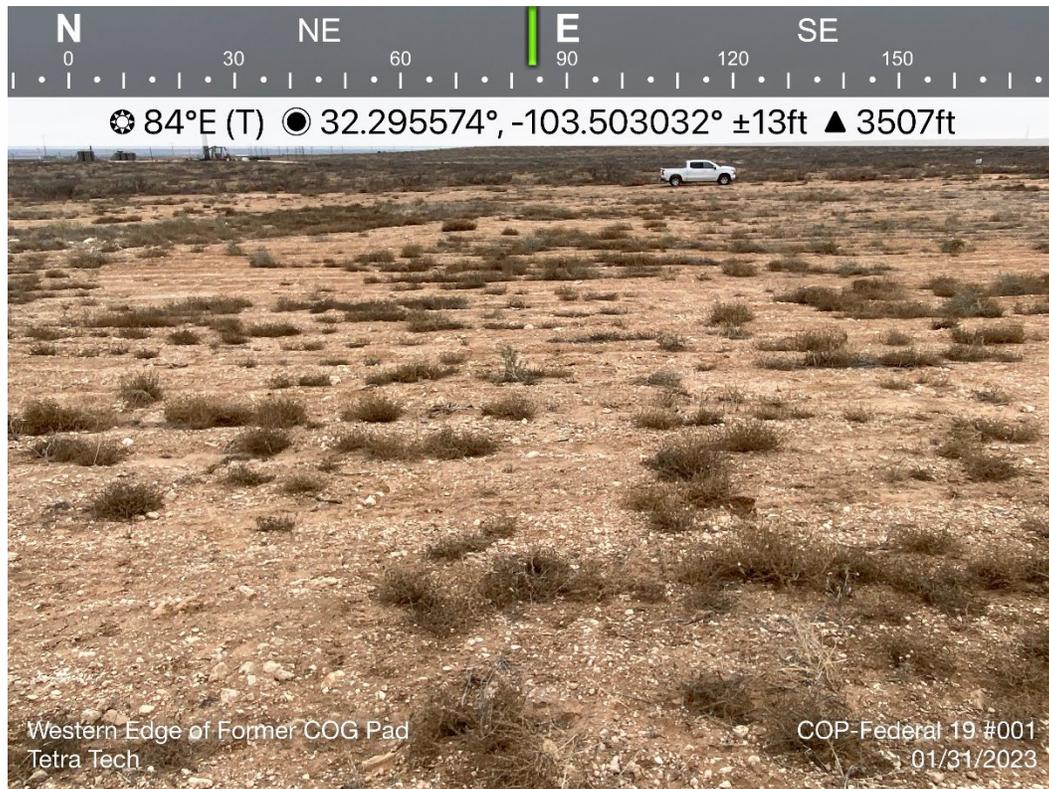
TETRA TECH, INC. PROJECT NO. 212C-MD-03000	DESCRIPTION	View east. Former lease pad.	1
	SITE NAME	ConocoPhillips Federal 19 #001	1/31/2023



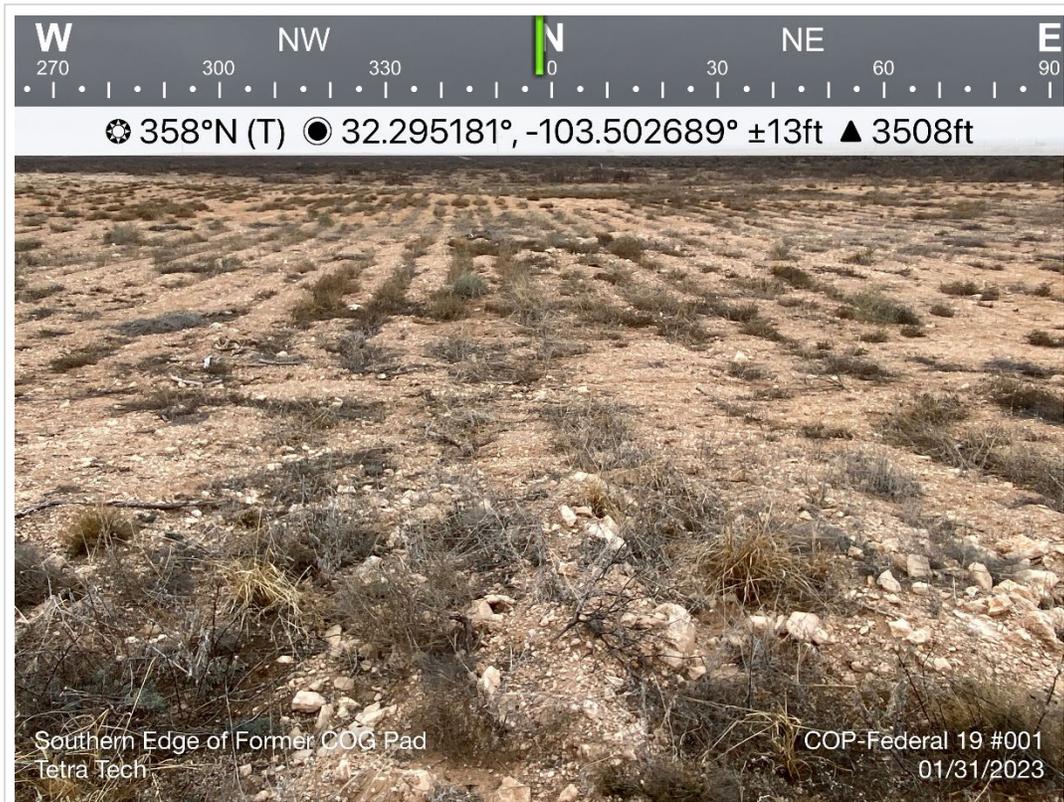
TETRA TECH, INC. PROJECT NO. 212C-MD-03000	DESCRIPTION	View east/southeast. View of former production equipment location. Vegetation present.	2
	SITE NAME	ConocoPhillips Federal 19 #001	1/31/2023



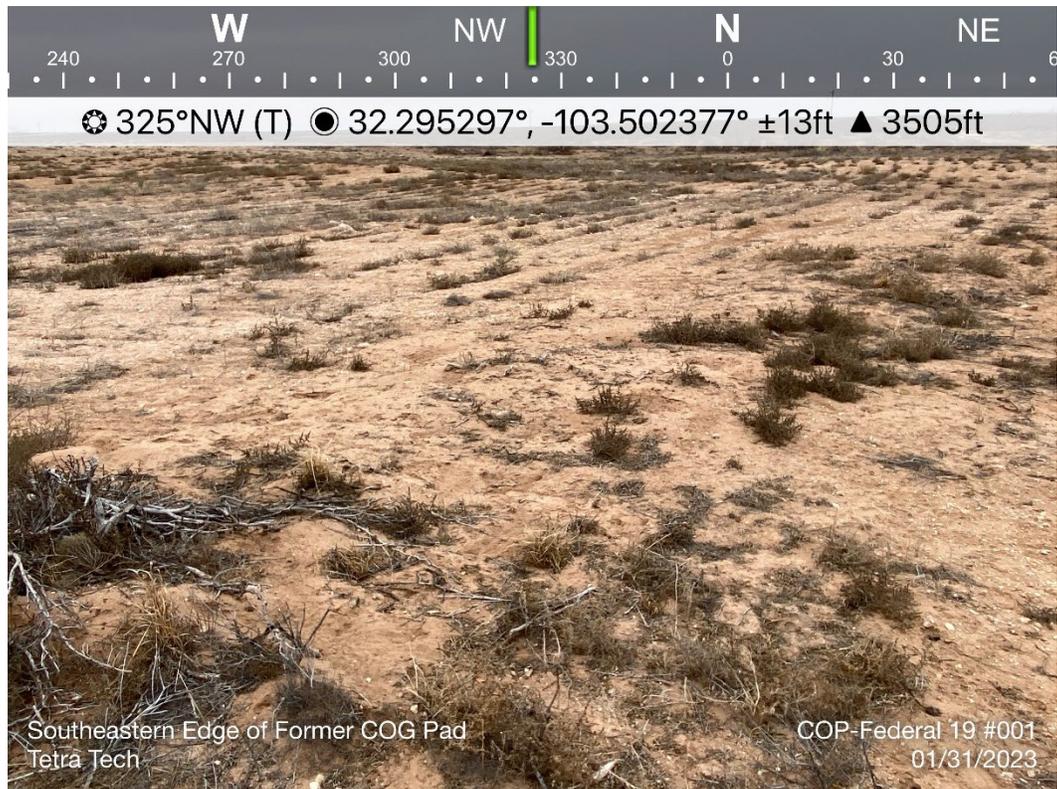
TETRA TECH, INC. PROJECT NO. 212C-MD-03000	DESCRIPTION	View north. View of former production equipment location. Vegetation present.	3
	SITE NAME	ConocoPhillips Federal 19 #001	1/31/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03000	DESCRIPTION	View east. Site pad conditions with vegetation present.	4
	SITE NAME	ConocoPhillips Federal 19 #001	1/31/2023



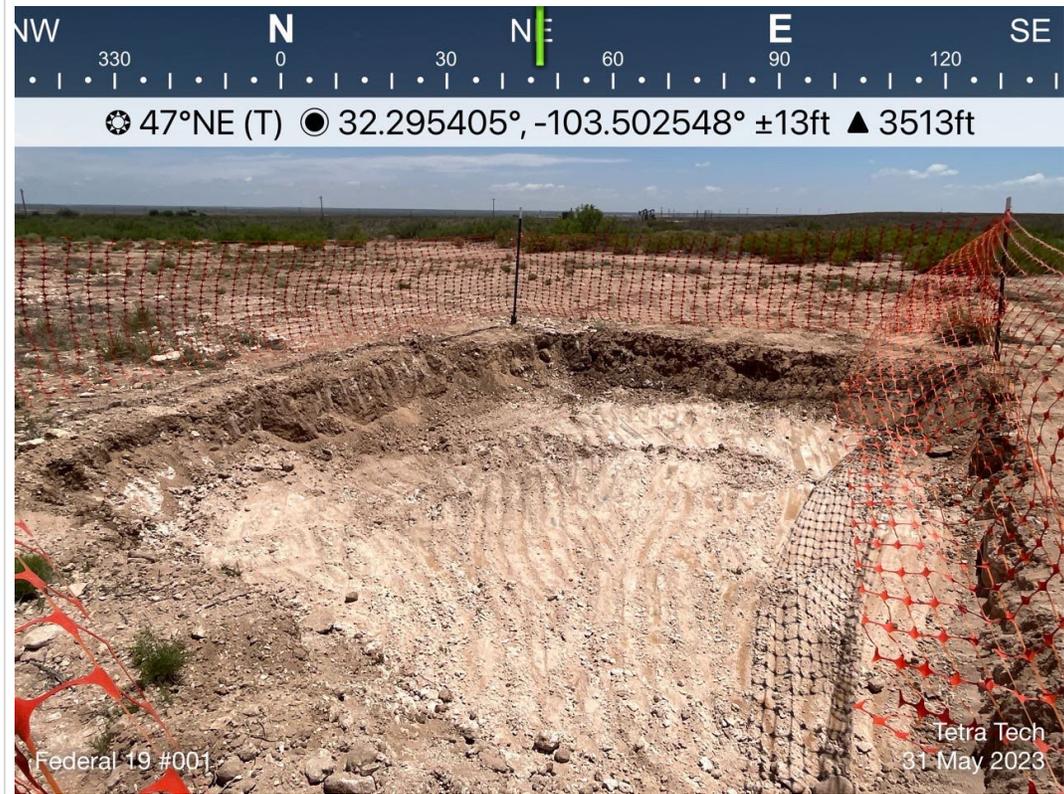
TETRA TECH, INC. PROJECT NO. 212C-MD-03000	DESCRIPTION	View north of Site pad conditions.	5
	SITE NAME	ConocoPhillips Federal 19 #001	1/31/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03000	DESCRIPTION	View northwest. Southeastern area of former lease pad. Vegetation present.	6
	SITE NAME	ConocoPhillips Federal 19 #001	1/31/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03000	DESCRIPTION	View southeast. View of 4-ft excavated area.	7
	SITE NAME	ConocoPhillips Federal 19 #001	5/31/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03000	DESCRIPTION	View northeast. View of the 2-foot excavated area.	8
	SITE NAME	ConocoPhillips Federal 19 #001	5/31/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03000	DESCRIPTION	View northwest. View of 4-foot excavation area with liner installation.	9
	SITE NAME	ConocoPhillips Federal 19 #001	5/31/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03000	DESCRIPTION	View southeast. View of 2-foot excavated area, backfilled and compacted.	10
	SITE NAME	ConocoPhillips Federal 19 #001	5/31/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03000	DESCRIPTION	View north. View of 4-foot excavated area, backfilled, compacted and re-seeded.	11
	SITE NAME	ConocoPhillips Federal 19 #001	5/31/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03000	DESCRIPTION	View northwest. View of 2-foot excavation after re-seeding.	12
	SITE NAME	ConocoPhillips Federal 19 #001	5/31/2023

APPENDIX E

Waste Manifests



Customer Copy

WEIGHT TICKET

Ticket # 172878
Start: 05/30/2023 12:16 PM
End: 05/30/2023 12:23 PM
By: owl.gina

GROSS	TARE	NET	PRICE	AMOUNT
Contaminated Soil				
18	00	18	\$0.01	\$0.18

Hauler: McNabb Partners
 Driver: JR Heredia
 Lease: Stratocaster 20 Fed
 Well: 001H
 AFE #: N/A
 County, State: LEA (NM)
 API #: 3002537295
 Manifest #: 01
 Client Company Man: Andrew Garcia
 Rig Name & Number: N/A
 Trucking Co Ticket #: N/A
 Truck Type: Belly Dumps
 UOM: Cuyd
 UOM Count: 18
 PF Test Result: Pass
 H2S Test: Pass

H2S Testing - PASS				
C1	00	01	\$0.00	\$0.00

Paint Filter - PASS				
C1	00	01	\$0.00	\$0.00

NORM - PASS				
C1	00	01	\$0.00	\$0.00

Additional Photos				
C1	00	01	\$0.00	\$0.00

22		20	01	\$0.18
----	--	----	----	--------

NET TOTAL --> \$0.18
 TAX --> \$0.00
 BONDING --> \$0.00
 TOTAL --> \$0.18

Customer: ConcretePhillips Company
 Driver: Karen Work
 ID/License:



Customer Copy

WEIGHT TICKET

Ticket # 172884

Start: 05/30/2023 12:53 PM

End: 05/30/2023 12:58 PM

By: cwl.gina

GROSS	TARE	NET	PRICE	AMOUNT
18	00	18	\$0.01	\$0.18

Contaminated Soil

Hauler: McNabb Partners
 Driver: Acie Mayberry
 Lease: Stratocaster 20 Fed com
 Well: OCTH
 AFE #: N/A
 County, State: LEA (NM)
 API #: 2002537295
 Manifest #: 02
 Client Company Man: Andrew Garcia
 Rig Name & Number: N/A
 Trucking Co Ticket #: N/A
 Truck Type: Belly Dumps
 UOM: Dyd
 UOM Count: 18
 PF Test Result: Pass
 H2S Test: Pass

C1	00	01	\$0.00	\$0.00
Paint Filter - PASS				
C1	00	01	\$0.00	\$0.00
NORM - PASS				
C1	00	01	\$0.00	\$0.00
Additional Photos				
C1	00	01	\$0.00	\$0.00
22			\$0.01	\$0.18

SUB-TOTAL ----> \$0.18
 TAX ----> \$0.01
 ROUNDING ----> \$0.00
 TOTAL ----> \$0.19

Customer: ConocoPhillips Company
 Driver: Karen Work
 ID/License:

Fed 19 #001
ACIE
TRUCK - M83



WEIGHT TICKET
 Ticket # 172888
 Start: 05/30/2023 01:40 PM
 End: 05/30/2023 01:43 PM
 By: cwl.judy

GROSS	TARE	NET	PRICE	AMOUNT
Contaminated Soil				
18	00	18	\$0.01	\$0.18
Hauler: McNabb Driver: Jr Heredia Lease: Srratocaster 20 Fed Well: 001 AFE #: N/A County, State: LEA (NM) API #: 3002537295 Manifest #: 03 Client Company Man: Andrew Garcia Rig Name & Number: N/A Trucking Co Ticket #: N/A Truck Type: Belly Dumps UOM: CuYd UOM Count: 18 PF Test Result: Pass H2S Test: Pass				

H2S Testing - PASS				
C1	00	01	\$0.00	\$0.00

Paint Filter - PASS				
C1	00	01	\$0.00	\$0.00

NORM - PASS				
C1	00	01	\$0.00	\$0.00

Additional Photos				
C1	00	01	\$0.00	\$0.00

22			\$0.01	\$0.18
----	--	--	--------	--------

SUBTOTAL	---->	\$0.18
TAX	---->	\$0.01
ROUNDING	---->	\$0.00
TOTAL	---->	\$0.19

Customer: ConocoPhillips Company
 Driver: Karen Work
 ID/Licence:



Customer Copy

WEIGHT TICKET

Ticket # 172899
Start: 05/30/2023 02:54 PM
End: 05/30/2023 02:59 PM
By: owl.gina

GROSS	TARE	NET	PRICE	AMOUNT
18	00	18	\$0.01	\$0.18

Contaminated Soil

Hauler: McNabb Partners
 Driver: Acie Mayberry
 Lease: Straocaster 20 Fed
 Well: OC1H
 AFE #: N/A
 County, State: LEA (NM)
 API #: 3002537296
 Manifest #: 04
 Client Company Man: Andrew Garcia
 Rig Name & Number: N/A
 Trucking Co Ticket #: N/A
 Truck Type: Belly Dumps
 UOM: Cuyd
 UOM Count: 18
 PF Test Result: Pass
 H2S Test: Pass

Paint Filter - PASS				
C1	00	01	\$0.00	\$0.00
NORM - PASS				
C1	00	01	\$0.00	\$0.00
Additional Photos				
C1	00	01	\$0.00	\$0.00
22			\$0.01	\$0.18
			SUBTOTAL ---->	\$0.18
			TAX ---->	\$0.01
			ROUNDING ---->	\$0.00
			TOTAL ---->	\$0.19

Customer: ConocoPhillips Company
 Driver: Karen Work
 ID/Licence:

Fed 1-9-001
ACIE
TRUCK M83



Customer Copy

-----WEIGHT TICKET-----

Ticket # 172900
Start:05/30/2023 03:01 PM
End:05/30/2023 03:07 PM
By:cwl.gina

GROSS	TARE	NET	PRICE	AMOUNT
Contaminated Soil				
18	00	18	\$0.01	\$0.18

Hauler: McNabb Partners
 Driver: JR Heredia
 Lease: Stratocaster 20 Fed
 Well: 001H
 AFE #: N/A
 County, State: LEA (NM)
 API #: 3002537295
 Manifest #: 05
 Client Company Man: Andrew Garcia
 Rig Name & Number: N/A
 Trucking Co Ticket #: N/A
 Truck Type: Belly Dumps
 UOM: Curb
 UOM Count: 18
 PF Test Result: Pass
 H2S Test: Pass

Contaminated Soil				
01	00	01	\$0.01	\$0.01

H2S Testing - PASS				
01	00	01	\$0.00	\$0.00

Paint Filter - PASS				
01	00	01	\$0.00	\$0.00

NORM - PASS				
01	00	01	\$0.00	\$0.00

Additional Photos				
01	00	01	\$0.00	\$0.00

23			\$0.01	\$0.19
----	--	--	--------	--------

SUBTOTAL ----> \$0.19
 TAX ----> \$0.01
 ROUNDING ----> \$0.00
 TOTAL ----> \$0.20

Customer: ConocoPhillips Company
 Driver: Karen Work
 ID/Licence:



Customer Copy

WEIGHT TICKET

Ticket # 172911

Start: 05/30/2023 04:21 PM

End: 05/30/2023 04:31 PM

By: owl.gina

GROSS	TARE	NET	PRICE	AMOUNT
Contaminated Soil				
18	00	18	\$0.01	\$0.18

Hauler: McNabb Partners
 Driver: Acie Mayberry
 Lease: Stratocaster 20 Fed
 Well: OC1H
 AFE #: N/A
 County, State: LEA (NM)
 API #: S002537295
 Manifest #: 6
 Client Company Man: Andrew Garcia
 Rig Name & Number: N/A
 Trucking Co Ticket #: N/A
 Truck Type: Belly Dumps
 UOM: CuYd
 UOM Count: 18
 FF Test Result: Pass
 H2S Test: Pass

H2S Testing - PASS				
C1	00	01	\$0.00	\$0.00

Paint Filter - PASS				
C1	00	01	\$0.00	\$0.00

NORM - PASS				
C1	00	01	\$0.00	\$0.00

Additional Photos				
C1	00	01	\$0.00	\$0.00

22			\$0.01	\$0.18
----	--	--	--------	--------

SUBTOTAL ----> \$0.18
 TAX ----> \$0.01
 ROUNDING ----> \$0.00
 TOTAL ----> \$0.19

Customer: ConocoPhillips Company
 Driver: Karen Work
 ID/License:

Fed 12-001
Truck M23



Customer Copy

WEIGHT TICKET

Ticket # 173022
Start: 05/31/2023 10:30 AM
End: 05/31/2023 10:35 AM
By: owl.gina

GROSS	TARE	NET	PRICE	AMOUNT
Contaminated Soil				
18	00	18	\$0.01	\$0.18

Hauler: McNabb Partners
 Driver: JR Heredia
 Lease: Stratocaster 20 Fed
 Well: 001H
 AFE #: N/A
 County, State: LEA (NM)
 API #: 3002537295
 Manifest #: 7
 Client Company Man: Andrew Garcia
 Rig Name & Number: N/A
 Trucking Co Ticket #: N/A
 Truck Type: Belly Dumps
 UOM: CuYd
 UOM Count: 18
 PF Test Result: Pass
 H2S Test: Pass

H2S Testing - PASS				
01	00	01	\$0.00	\$0.00

Paint Filter - PASS				
01	00	01	\$0.00	\$0.00

NORM - PASS				
01	00	01	\$0.00	\$0.00

Additional Photos				
01	00	01	\$0.00	\$0.00

22			\$0.01	\$0.18
----	--	--	--------	--------

SUBTOTAL ----> \$0.18
 TAX ----> \$0.01
 ROUNDING ----> \$0.00
 TOTAL ----> \$0.19

Customer: ConocoPhillips Company
 Driver: Karen Work
 ID/License:

APPENDIX F

Laboratory Analytical Data



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

May 31, 2023

CHRISTIAN LLULL

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: FEDERAL 19 #001

Enclosed are the results of analyses for samples received by the laboratory on 05/30/23 16:15.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-22-15. 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". The signature is written in a cursive style with a large, flowing "C" at the beginning.

Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

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

Received:	05/30/2023	Sampling Date:	05/30/2023
Reported:	05/31/2023	Sampling Type:	Soil
Project Name:	FEDERAL 19 #001	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03000	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA COUNTY, NM		

Sample ID: NSW - 1 (H232743-01)

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/31/2023	ND	2.33	116	2.00	4.18	
Toluene*	<0.050	0.050	05/31/2023	ND	2.30	115	2.00	4.14	
Ethylbenzene*	<0.050	0.050	05/31/2023	ND	2.26	113	2.00	4.79	
Total Xylenes*	<0.150	0.150	05/31/2023	ND	6.91	115	6.00	5.55	
Total BTEX	<0.300	0.300	05/31/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 101 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	160	16.0	05/31/2023	ND	448	112	400	3.64	

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	05/30/2023	ND	188	94.1	200	4.45	
DRO >C10-C28*	<10.0	10.0	05/30/2023	ND	192	95.8	200	4.65	
EXT DRO >C28-C36	<10.0	10.0	05/30/2023	ND					

Surrogate: 1-Chlorooctane 91.4 % 48.2-134

Surrogate: 1-Chlorooctadecane 101 % 49.1-148

Cardinal Laboratories

* = Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

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

Received:	05/30/2023	Sampling Date:	05/30/2023
Reported:	05/31/2023	Sampling Type:	Soil
Project Name:	FEDERAL 19 #001	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03000	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA COUNTY, NM		

Sample ID: NSW - 2 (H232743-02)

BTEX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	05/31/2023	ND	2.33	116	2.00	4.18		
Toluene*	<0.050	0.050	05/31/2023	ND	2.30	115	2.00	4.14		
Ethylbenzene*	<0.050	0.050	05/31/2023	ND	2.26	113	2.00	4.79		
Total Xylenes*	<0.150	0.150	05/31/2023	ND	6.91	115	6.00	5.55		
Total BTEX	<0.300	0.300	05/31/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 102 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	240	16.0	05/31/2023	ND	448	112	400	3.64		

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	05/30/2023	ND	188	94.1	200	4.45		
DRO >C10-C28*	22.3	10.0	05/30/2023	ND	192	95.8	200	4.65		
EXT DRO >C28-C36	<10.0	10.0	05/30/2023	ND						

Surrogate: 1-Chlorooctane 90.9 % 48.2-134

Surrogate: 1-Chlorooctadecane 106 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

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

Received:	05/30/2023	Sampling Date:	05/30/2023
Reported:	05/31/2023	Sampling Type:	Soil
Project Name:	FEDERAL 19 #001	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03000	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA COUNTY, NM		

Sample ID: ESW - 1 (H232743-03)

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/31/2023	ND	2.33	116	2.00	4.18	
Toluene*	<0.050	0.050	05/31/2023	ND	2.30	115	2.00	4.14	
Ethylbenzene*	<0.050	0.050	05/31/2023	ND	2.26	113	2.00	4.79	
Total Xylenes*	<0.150	0.150	05/31/2023	ND	6.91	115	6.00	5.55	
Total BTEX	<0.300	0.300	05/31/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 104 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	128	16.0	05/31/2023	ND	448	112	400	3.64	

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	05/30/2023	ND	188	94.1	200	4.45	
DRO >C10-C28*	<10.0	10.0	05/30/2023	ND	192	95.8	200	4.65	
EXT DRO >C28-C36	<10.0	10.0	05/30/2023	ND					

Surrogate: 1-Chlorooctane 94.3 % 48.2-134

Surrogate: 1-Chlorooctadecane 110 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received:	05/30/2023	Sampling Date:	05/30/2023
Reported:	05/31/2023	Sampling Type:	Soil
Project Name:	FEDERAL 19 #001	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03000	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA COUNTY, NM		

Sample ID: SSW - 1 (H232743-04)

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/31/2023	ND	2.33	116	2.00	4.18	
Toluene*	<0.050	0.050	05/31/2023	ND	2.30	115	2.00	4.14	
Ethylbenzene*	<0.050	0.050	05/31/2023	ND	2.26	113	2.00	4.79	
Total Xylenes*	<0.150	0.150	05/31/2023	ND	6.91	115	6.00	5.55	
Total BTEX	<0.300	0.300	05/31/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 103 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	176	16.0	05/31/2023	ND	448	112	400	3.64	

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	05/30/2023	ND	188	94.1	200	4.45	
DRO >C10-C28*	<10.0	10.0	05/30/2023	ND	192	95.8	200	4.65	
EXT DRO >C28-C36	<10.0	10.0	05/30/2023	ND					

Surrogate: 1-Chlorooctane 96.1 % 48.2-134

Surrogate: 1-Chlorooctadecane 111 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received:	05/30/2023	Sampling Date:	05/30/2023
Reported:	05/31/2023	Sampling Type:	Soil
Project Name:	FEDERAL 19 #001	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03000	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA COUNTY, NM		

Sample ID: SSW - 2 (H232743-05)

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/31/2023	ND	2.33	116	2.00	4.18	
Toluene*	<0.050	0.050	05/31/2023	ND	2.30	115	2.00	4.14	
Ethylbenzene*	<0.050	0.050	05/31/2023	ND	2.26	113	2.00	4.79	
Total Xylenes*	<0.150	0.150	05/31/2023	ND	6.91	115	6.00	5.55	
Total BTEX	<0.300	0.300	05/31/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 104 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	112	16.0	05/31/2023	ND	448	112	400	3.64	

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	05/30/2023	ND	188	94.1	200	4.45	
DRO >C10-C28*	<10.0	10.0	05/30/2023	ND	192	95.8	200	4.65	
EXT DRO >C28-C36	<10.0	10.0	05/30/2023	ND					

Surrogate: 1-Chlorooctane 89.4 % 48.2-134

Surrogate: 1-Chlorooctadecane 103 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received:	05/30/2023	Sampling Date:	05/30/2023
Reported:	05/31/2023	Sampling Type:	Soil
Project Name:	FEDERAL 19 #001	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03000	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA COUNTY, NM		

Sample ID: WSW - 1 (H232743-06)

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/31/2023	ND	2.33	116	2.00	4.18	
Toluene*	<0.050	0.050	05/31/2023	ND	2.30	115	2.00	4.14	
Ethylbenzene*	<0.050	0.050	05/31/2023	ND	2.26	113	2.00	4.79	
Total Xylenes*	<0.150	0.150	05/31/2023	ND	6.91	115	6.00	5.55	
Total BTEX	<0.300	0.300	05/31/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 102 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	272	16.0	05/31/2023	ND	448	112	400	3.64	

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	05/30/2023	ND	188	94.1	200	4.45	
DRO >C10-C28*	22.0	10.0	05/30/2023	ND	192	95.8	200	4.65	
EXT DRO >C28-C36	<10.0	10.0	05/30/2023	ND					

Surrogate: 1-Chlorooctane 92.6 % 48.2-134

Surrogate: 1-Chlorooctadecane 110 % 49.1-148

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Analytical Results For:

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

Received:	05/30/2023	Sampling Date:	05/30/2023
Reported:	05/31/2023	Sampling Type:	Soil
Project Name:	FEDERAL 19 #001	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03000	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA COUNTY, NM		

Sample ID: FS - 1 (H232743-07)

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/31/2023	ND	2.33	116	2.00	4.18	
Toluene*	<0.050	0.050	05/31/2023	ND	2.30	115	2.00	4.14	
Ethylbenzene*	<0.050	0.050	05/31/2023	ND	2.26	113	2.00	4.79	
Total Xylenes*	<0.150	0.150	05/31/2023	ND	6.91	115	6.00	5.55	
Total BTEX	<0.300	0.300	05/31/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 103 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1440	16.0	05/31/2023	ND	448	112	400	3.64	

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	05/30/2023	ND	188	94.1	200	4.45	
DRO >C10-C28*	<10.0	10.0	05/30/2023	ND	192	95.8	200	4.65	
EXT DRO >C28-C36	<10.0	10.0	05/30/2023	ND					

Surrogate: 1-Chlorooctane 104 % 48.2-134

Surrogate: 1-Chlorooctadecane 125 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received:	05/30/2023	Sampling Date:	05/30/2023
Reported:	05/31/2023	Sampling Type:	Soil
Project Name:	FEDERAL 19 #001	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03000	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA COUNTY, NM		

Sample ID: FS - 2 (H232743-08)

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/31/2023	ND	2.33	116	2.00	4.18	
Toluene*	<0.050	0.050	05/31/2023	ND	2.30	115	2.00	4.14	
Ethylbenzene*	<0.050	0.050	05/31/2023	ND	2.26	113	2.00	4.79	
Total Xylenes*	<0.150	0.150	05/31/2023	ND	6.91	115	6.00	5.55	
Total BTEX	<0.300	0.300	05/31/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 101 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	256	16.0	05/31/2023	ND	448	112	400	3.64	

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	05/30/2023	ND	188	94.1	200	4.45	
DRO >C10-C28*	<10.0	10.0	05/30/2023	ND	192	95.8	200	4.65	
EXT DRO >C28-C36	<10.0	10.0	05/30/2023	ND					

Surrogate: 1-Chlorooctane 80.1 % 48.2-134

Surrogate: 1-Chlorooctadecane 95.9 % 49.1-148

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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

Celey D. Keene, Lab Director/Quality Manager



101 East Marland, Hobbs, NM 88240
 (575) 393-2326 FAX (575) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page 1 of 1

BILL TO

ANALYSIS REQUEST

Company Name: Copaco Phillips P.O. #: _____
 Project Manager: Christian Luvh Company: Tetra Tech
 Address: _____ Attn: Christian Luvh
 City: _____ State: _____ Zip: _____
 Phone #: _____ Fax #: _____
 Project #: 212-MD-03000 Project Owner: _____
 Project Name: Federal 19 # 001 City: _____ State: _____ Zip: _____
 Project Location: Lea Co, NM Phone #: _____
 Sampler Name: Andrew Garcia Fax #: _____

Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX						DATE	TIME	TPH	BTEX	Chlorides 4500
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :					
<u>H232743</u>	<u>NSW-1</u>	<u>G</u>	<u>1</u>			<u>X</u>				<u>30 May</u>	<u>900</u>	<u>X</u>	<u>X</u>	<u>X</u>
	<u>NSW-2</u>										<u>930</u>	<u>X</u>	<u>X</u>	<u>X</u>
	<u>ESW-1</u>										<u>1030</u>	<u>X</u>	<u>X</u>	<u>X</u>
	<u>SSW-1</u>										<u>1100</u>	<u>X</u>	<u>X</u>	<u>X</u>
	<u>SSW-2</u>										<u>1130</u>	<u>X</u>	<u>X</u>	<u>X</u>
	<u>WSW-1</u>										<u>1200</u>	<u>X</u>	<u>X</u>	<u>X</u>
	<u>FS-1</u>										<u>1230</u>	<u>X</u>	<u>X</u>	<u>X</u>
	<u>FS-2</u>													

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Relinquished By: _____ Date: _____
 Received By: _____ Date: 30 May 23
 Time: 4:15

Observed Temp. °C: 4.8 Sample Condition: Intact Cool Yes No
 Corrected Temp. °C: 4.2 Checked BY: AP

Turnaround Time: _____ Standard Rush
 Thermometer ID #113 Correction Factor -0.6°C

REMARKS: Sam. Abbott @ Tetra Tech. com
Lisbeth. Chavez @ Tetra Tech. com
Nicholas. Poole @ Tetra Tech. com

Verbal Result: Yes No Add'l Phone #: _____
 All Results are emailed. Please provide Email address: _____

Delivered By: (Circle One) _____
 Sampler - UPS - Bus - Other: _____

FORM 000-033-0717-02Z

† Cardinal cannot accept verbal changes. Please email changes to celey.keene@cardinallabsnm.com

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 230392

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 230392
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
amaxwell	None	6/22/2023