



January 16, 2024

District Supervisor
Oil Conservation Division, District 2
New Mexico Energy, Minerals and Natural Resources Department
811 S. First St.
Artesia, NM 88210

**Re: Revised Closure Request
ConocoPhillips (Heritage COG Operating, LLC)
GJ West Coop Unit 161 Release
Unit Letter P, Section 16, Township 17 South, Range 29 East
Eddy County, New Mexico
Incident ID# NAB1731257717**

Ms. Hall,

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips Company (ConocoPhillips) to assess a historic Heritage COG Operating, LLC (Concho) release and subsequent assessment and remedial actions completed at the GJ West Coop Unit 161 Release site, located approximately 0.4 miles southwest of the GJ West Coop Unit #161 well (API No. 30-015-35651). The release footprint is located in Public Land Survey System (PLSS) Unit Letter P, Section 16, Township 17 South, Range 29 East, in Eddy County, New Mexico (Site). The approximate release point occurred at coordinates 32.828550°, -104.0730348°, as shown on Figures 1 and 2. The release is located on State Trust Lands managed by the New Mexico State Land Office (NMSLO). The well is currently operated by Spur Energy Partners, LLC.

BACKGROUND

According to the State of New Mexico Oil Conservation Division (NMOCD) C-141 Initial Report, the release was discovered on November 2, 2017. The release consisted of 0.5 barrels (bbls) of oil and 4.5 bbls of produced water, of which 0.25 bbls of oil and 3 bbls of produced water were recovered. The release was caused by corrosion of a steel flowline. During initial response activities, free standing fluids were recovered utilizing a vacuum truck and the corroded section of flowline was replaced with poly. The NMOCD approved the initial C-141 on November 8, 2017, and subsequently assigned the release the Incident ID NAB1731257717. The initial C-141 form is included in Appendix A.

This incident is included in an Agreed Compliance Order-Releases (ACO-R) between COG Operating LLC (Concho) and the NMOCD signed on November 20 and 26, 2018, respectively.

SITE ASSESSMENT ACTIVITIES AND 2018 SOIL REMEDIATION WORK PLAN

Initial release assessment activities were conducted in December 2017. Concho field personnel collected soil samples from three (3) locations (T1 through T3) to depths ranging from 8-16 feet bgs. Based on the results of the assessment activities and the RRALs determined by the site ranking according to the NMOCD *Guidelines for Remediation of Leaks, Spills, and Releases* (1993), HRL Compliance Solutions (HRL) prepared a Soil Remediation Work Plan dated March 26, 2018 on behalf of Concho. HRL proposed excavating the release extent in the vicinity of sample T2 to "a safe depth." The analytical table included with the Soil Remediation Work Plan indicated that soils in this area were proposed for excavation to a depth of approximately 10 feet bgs. Approximately six (6) inches of topsoil were proposed for removal

Tetra Tech

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ConocoPhillips

around the T1 and T3 sample locations. A total of approximately 140 cubic yards of contaminated soil would be excavated and disposed of at an approved soil waste disposal facility. The excavated area would then be backfilled with clean soils and revegetated with the appropriate NMSLO seed mixture "L".

A copy of the Soil Remediation Work Plan is included in the NMOCD Online Imaging files for the release incident. A copy of the soil assessment analytical table from the plan is included in this report as Table 1.

The Soil Remediation Work Plan was accepted by the NMSLO pending any additional OCD requirements via email dated March 27, 2018. The NMOCD conditionally approved the plan via email dated April 26, 2018 with the following two items needing clarification:

- "OCD will need the excavation for the area around sample point T-1 and T-3 to go thru surface till the 1' interval is reached.
- Also OCD is a little confused on what is proposed to be done at T-2. In the table it states that whatever is highlighted in green signifies the extent the excavation will go down to and for T-2 a depth down to 10' is highlighted in green, however in the write up it says "excavation will occur to a safe depth..." what does that mean? Please provide clarification on what that statement means cause it does not give a clear answer on what intentions on for that area."

Tetra Tech and ConocoPhillips were not able to locate any additional correspondence that addressed the NMOCD request for additional clarification. Copies of the available NMOCD correspondence are located in Appendix B.

2018 CLOSURE REQUEST

HRL prepared a Final Closure Plan for the release incident dated July 13, 2018, on behalf of COG Operating LLC (Concho). According to this report, the area of T2 was excavated to a depth of 4 feet bgs and a 40 mil liner was placed at the base of the excavation prior to backfill. The area of T1 was excavated to a depth of 6 inches in the areas around shallow buried pipelines and to 1 foot bgs where feasible. The area of T3 was excavated to a depth of 1 foot bgs. Confirmation samples were collected for chlorides, with all analytical results below 600 mg/kg. The excavated areas were backfilled to their original state with appropriate material. According to the closure request, the facility was still in production at the time of the remediation activities and "requires no vegetation plan. All excavation occurred on the production pad and lease road with the exception of a small area in the pasture which is covered with production flow lines."

A copy of the Final Closure Plan is included in the NMOCD Online Imaging files for the release incident. A copy of the confirmation sampling analytical table from the plan is included in this report as Table 2.

On May 10, 2023, NMOCD rejected the Final Closure Plan with the following comments:

- "The latitude and longitude on the C-141 (32.8337212 -104.0766373) does not match the latitude and longitude listed in Table 1 of the report (32.891278 -103.0766373) or the latitude or longitude on the sample location Figure (32.828550 -104.0730348).
- Clarify the conflicting latitudes and longitudes between the C-141, Table 1, and sample location figure.
- Submit a report via the OCD permitting portal by 8/25/2023."

RESPONSE TO NMOCD COMMENTS

The correct latitude and longitude for the release point are 32.828550°, -104.0730348°, as indicated in the sample location figure provided in the 2018 Final Closure Plan. The latitude and longitude coordinates listed on the initial C-141 (32.8337212°, -104.0766373°) correspond to the location of the GJ West Coop #161 well, which, as stated previously, is located approximately 0.4 miles northwest of the incident release point. The release coordinates listed in Table 1: Release Information and Site Ranking in the 2018 Final Closure Plan appears to be an error without a clear explanation. These coordinates (32.891278°, -103.0766373°)

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ConocoPhillips

correspond to a location approximately 58 miles east of the release site. Figure 3 presents clarification of the reported excavation extents and sampling locations that were reported by HRL.

CONCLUSION

This revised closure request is presented to the NMOCD to provide the requested clarification of conflicting latitudes and longitudes included in the 2018 Final Closure Plan. As previously stated, the correct coordinates for the release incident NAB1731257717 are 32.828550°, -104.0730348°. Further clarification of the excavation activities performed at the Site in December 2017, including all sampling locations and excavation depths, are illustrated in Figure 3.

If you have any additional questions concerning the information presented in this report, 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. Ike Tavarez, RMR – ConocoPhillips

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ConocoPhillips

LIST OF ATTACHMENTS

Figures:

- Figure 1 – Overview Map
- Figure 2 – Topographic Map
- Figure 3 – Remediation Extents and Confirmation Sampling Locations

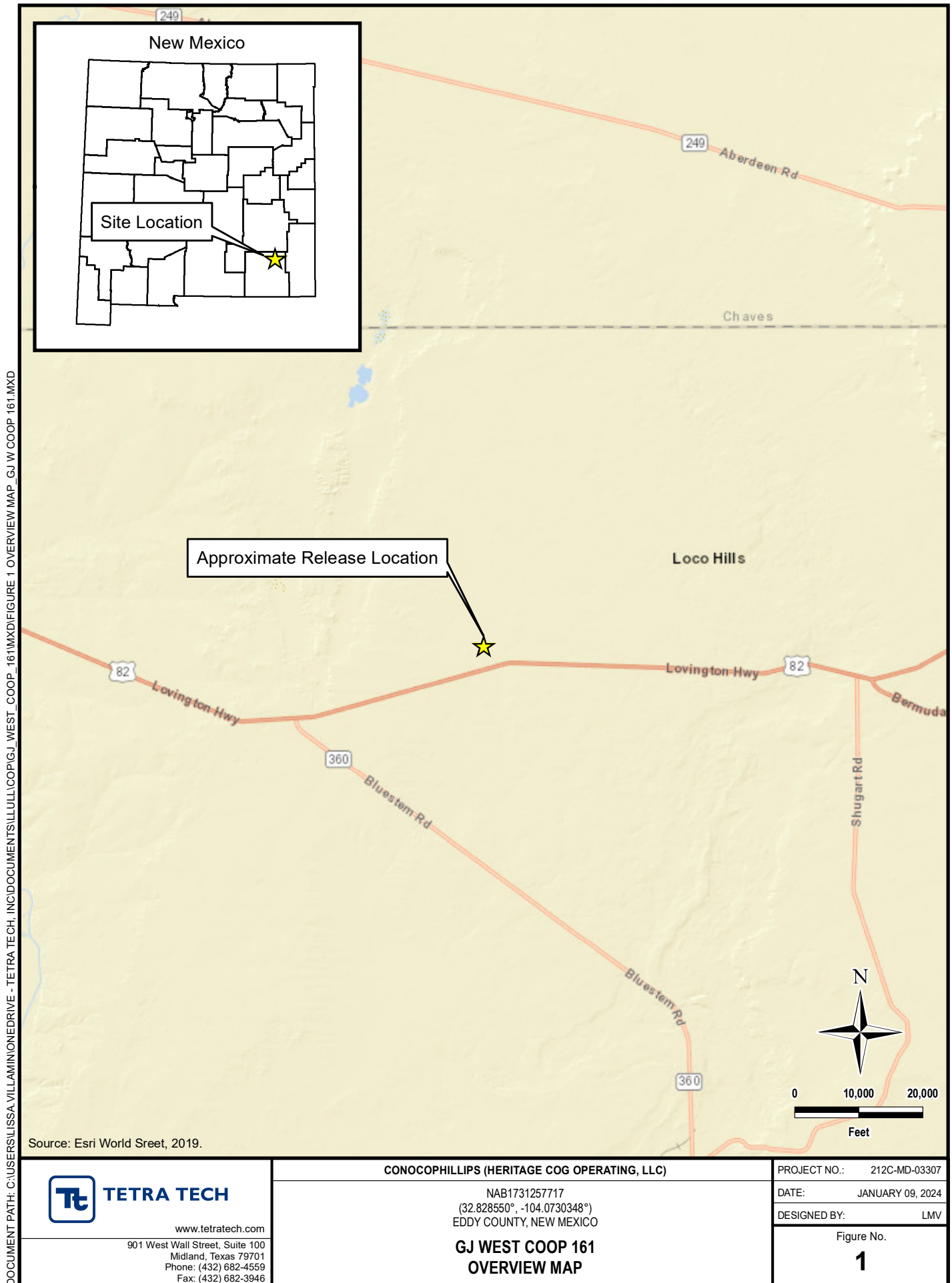
Tables:

- Table 1 – Summary of Analytical Results – Delineation Sampling (HRL, 2017)
- Table 2 – Summary of Analytical Results – Confirmation Sampling (HRL, 2017)

Appendices:

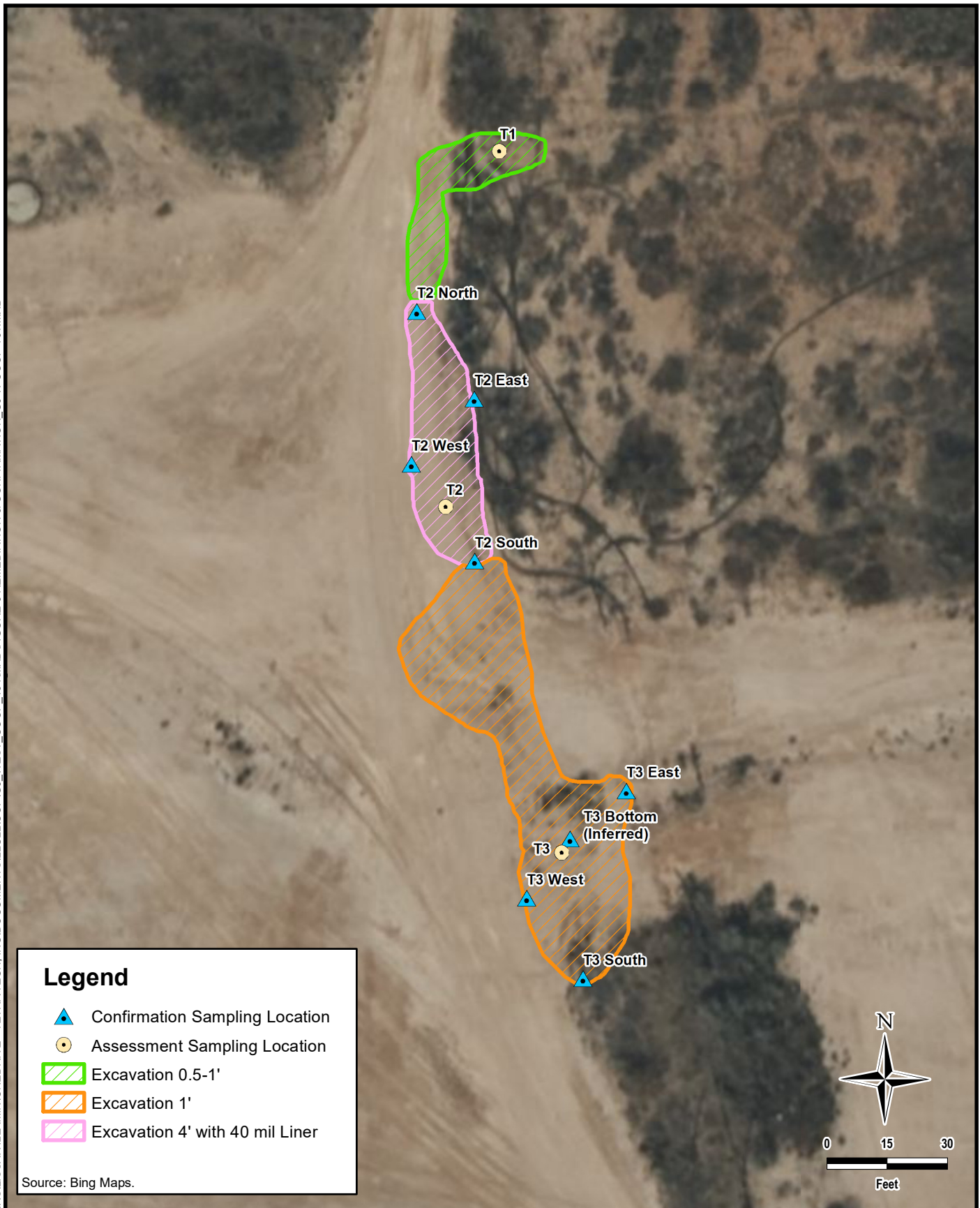
- Appendix A – C-141 Forms
- Appendix B – Regulatory Correspondence

FIGURES





DOCUMENT PATH: C:\USERS\LISSA.VILLAMINIONEDRIVE - TETRA TECH\INC\DOCUMENTS\ILLU\COPI\GJ WEST COOP 161\MXD\FIGURE 3 REMEDIATION & CONFIRMATION_GJ W COOP 161.MXD

**TETRA TECH**

www.tetrattech.com

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

CONOCOPHILLIPS

NAB1731257717
(32.828550°, -104.0730348°)
EDDY COUNTY, NEW MEXICO

GJ WEST COOP 161**REMEDIATION EXTENTS AND CONFIRMATION SAMPLING LOCATIONS**

PROJECT NO.: 212C-MD-03307

DATE: JANUARY 09, 2024

DESIGNED BY: LMV

Figure No.

3

TABLES



Table 1: Analytical Results Summary

Summary of Delineation Sampling Analytical Results												
Concentrations of Benzene, BTEX, TPH & Chloride in Soil												
SAMPLE LOCATION	SAMPLE DEPTH (bgs)	SAMPLE DATE	SOIL STATUS	8021B					8015M			300.0
				BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYLBENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)	TOTAL BTEX (mg/Kg)	GRO (mg/Kg)	DRO (mg/Kg)	Total TPH (mg/Kg)	CHLORIDE (mg/Kg)
NMOCD - Guidelines for Remediation of Leaks, Spills and Releases				10	NE	NE	NE	50	NE	NE	5,000	600
Vertical Delineation Sampling												
T1	Surface	12/4/2017	In-Situ	<0.00199	<0.00199	<0.00199	<0.00199	<0.00199	<15.0	7750	9870	21,900
T1	1'	12/4/2017	In-Situ	<0.00198	<0.00198	<0.00198	<0.00198	<0.00198	<15.0	<15.0	<15.0	9.03
T1	2'	12/4/2017	In-Situ	<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	<15.0	<15.0	<15.0	24.8
T1	3'	12/4/2017	In-Situ	<0.00202	<0.00202	<0.00202	<0.00202	<0.00202	<15.0	<15.0	<15.0	<1.97
T1	14'	-	-	-	-	-	-	-	-	-	-	-
T1	16'	-	-	-	-	-	-	-	-	-	-	472
T2	Surface	12/4/2017	In-Situ	<0.00200	0.01	0.049	0.0957	155	18.6	153	211	32,700
T2	1'	12/4/2017	In-Situ	<0.00202	0.00202	<0.00202	<0.00202	0.00202	<15.0	<15.0	<15.0	4,010
T2	2'	12/4/2017	In-Situ	<0.00201	<0.00201	<0.00201	<0.00200	<0.00200	<15.0	<15.0	<15.0	4,450
T2	3'	12/4/2017	In-Situ	<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	<15.0	<15.0	<15.0	11,200.0
T2	4'	12/4/2017	In-Situ	<0.00199	<0.00199	<0.00199	<0.00199	<0.00199	<15.0	<15.0	<15.0	2,030
T2	6'	12/4/2017	In-Situ	<0.00202	<0.00202	<0.00202	<0.00202	<0.00202	<15.0	<15.0	<15.0	1,150
T2	8'	12/4/2017	In-Situ	<0.00201	<0.00201	<0.00201	<0.00201	<0.00201	<15.0	<15.0	<15.0	1,270
T2	10'	12/4/2017	In-Situ	<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	<15.0	<15.0	<15.0	672
T2	12'	12/4/2017	In-Situ	<0.00198	<0.00198	<0.00198	<0.00198	<0.00198	<15.0	<15.0	<15.0	261

Concho | GJ Coop 161 | 3/26/2018



Table 1: Analytical Results Summary (continued)

Summary of Delineation Sampling Analytical Results												
Concentrations of Benzene, BTEX, TPH & Chloride in Soil												
SAMPLE LOCATION	SAMPLE DEPTH (bgs)	SAMPLE DATE	SOIL STATUS	8021B					8015M			300.0
				BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYLBENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)	TOTAL BTEX (mg/Kg)	GRO (mg/Kg)	DRO (mg/Kg)	Total TPH (mg/Kg)	CHLORIDE (mg/Kg)
NMOCD - Guidelines for Remediation of Leaks, Spills and Releases				10	NE	NE	NE	50	NE	NE	5,000	600
Vertical Delineation Sampling												
T3	Surface	12/4/2017	In-Situ	<0.00198	<0.00198	<0.00198	<0.00198	<0.00198	<15	18.7	18.7	24,200
T3	1'	12/4/2017	In-Situ	<0.00201	<0.00201	<0.00201	<0.00201	<0.00201	<15.0	<15.0	<15.0	23.1
T3	2'	12/4/2017	In-Situ	<0.00201	<0.00201	<0.00201	<0.00201	<0.00201	<15.0	<15.0	<15.0	5.74
T3	3'	12/4/2017	In-Situ	<0.00199	<0.00199	<0.00199	<0.00199	<0.00199	<15.0	<15.0	<15.0	27.5
T3	4'	12/4/2017	In-Situ	<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	<15.0	<15.0	<15.0	10.6
T3	5'	12/4/2017	In-Situ	<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	<15.0	<15.0	<15.0	825.0
T3	8'	-	-									

mg/Kg - milligrams per

Kilogram

— = Not Established

Concentrations in **BOLD** exceed the
NMOCD Guidelines
 Proposed excavated area



Table 2: Summary of Sample Results

TABLE 2												
Summary of Delineation Sampling Analytical Results												
Concentrations of Benzene, BTEX, TPH & Chloride in Soil												
Concho												
GJ West Coop Unit #161												
Eddy County, New Mexico												
NMOCD REF: 2RP-4478												
SAMPLE LOCATION	SAMPLE DEPTH (bgs)	SAMPLE DATE	SOIL STATUS	8021B					8015M			300.0
				BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYLBENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)	TOTAL BTEX (mg/Kg)	GRO (mg/Kg)	DRO (mg/Kg)	Total TPH (mg/Kg)	CHLORIDE (mg/Kg)
NMOCD - Guidelines for Remediation of Leaks, Spills and Releases				10	NE	NE	NE	50	NE	NE	5,000	600
Vertical Delineation Sampling												
T2 West	Sidewall	6/28/2018	In-Situ	-	-	-	-	-	-	-	-	240
T2 East	Sidewall	6/28/2018	In-Situ	-	-	-	-	-	-	-	-	280
T2 North	Sidewall	6/28/2018	In-Situ	-	-	-	-	-	-	-	-	320
T2 South	Sidewall	6/28/2018	In-Situ	-	-	-	-	-	-	-	-	470
T3	Bottom	6/28/2018	In-Situ	-	-	-	-	-	-	-	-	480
T3 East	Sidewall	6/28/2018	In-Situ	-	-	-	-	-	-	-	-	150
T3 West	Sidewall	6/28/2018	In-Situ	-	-	-	-	-	-	-	-	150
T3 South	Sidewall	6/28/2018	In-Situ	-	-	-	-	-	-	-	-	86
mg/Kg - milligrams per Kilogram												
— = Not Established												
Concentrations in BOLD exceed the NMOCD Guidelines												

APPENDIX A C-141 Forms

NM OIL CONSERVATION

ARTESIA DISTRICT

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

NOV 06 2017

Form C-141
Revised April 3, 2017

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

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

Release Notification and Corrective Action

NAB173257717 OPERATOR ☒ Initial Report ☐ Final Report

Name of Company: COG Operating LLC <u>224/137</u>	Contact: Robert McNeil
Address: 600 West Illinois Avenue, Midland TX 79701	Telephone No. 432-683-7443
Facility Name: G J West Coop Unit #161	Facility Type: Flowline

Surface Owner: State	Mineral Owner: State	API No. 30-015-35651
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LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
J	16	17S	29E	2310	South	1650	East	Eddy

Latitude 32.8337212 Longitude -104.0766373 NAD83

NATURE OF RELEASE

Type of Release: Oil & Produced Water	Volume of Release: 0.5 bbl. Oil & 4.5 bbl. PW	Volume Recovered: 0.25 bbl. Oil & 3 bbl. PW
Source of Release: Steel Flowline	Date and Hour of Occurrence: November 2, 2017 6:45 am	Date and Hour of Discovery: November 2, 2017 6:45 am
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.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

The release was due to corrosion of a steel flowline. The section of flowline was replaced with poly.

Describe Area Affected and Cleanup Action Taken.*

The release was on location, along a lease road and within the adjacent pasture. 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.

OIL CONSERVATION DIVISION

Signature: <u>Rebecca Haskell</u>	Approved by Environmental Specialist <u>Cynthia W.</u>	
Printed Name: Rebecca Haskell	Approval Date: <u>11/8/17</u>	Expiration Date: <u>NIA</u>
Title: Senior HSE Coordinator	Conditions of Approval: <u>see attached</u>	
E-mail Address: rhaskell@concho.com	Attached: <u>20P-4478</u>	
Date: November 6, 2017 Phone: 432-683-7443		

* Attach Additional Sheets If Necessary

Operator/Responsible Party,

The OCD has received the form C-141 you provided on **11/6/17** regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number ARD-4478 has been assigned. **Please refer to this case number in all future correspondence.**

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

The responsible person shall complete division-approved corrective action for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC. [emphasis added]

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. **As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District II office in Artesia on or before 12/6/17. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.**

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

- Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.
- Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.
- Nominal detection limits for field and laboratory analyses must be provided.
- Composite sampling is not generally allowed.
- Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

- Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.

- If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.

- Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.

Jim Griswold
OCD Environmental Bureau Chief
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
505-476-3465
jim.griswold@state.nm.us

Weaver, Crystal, EMNRD

From: Rebecca Haskell <RHaskell@concho.com>
Sent: Monday, November 6, 2017 11:49 AM
To: Weaver, Crystal, EMNRD; Amber Groves (agroves@SLO.state.nm.us)
Cc: Bratcher, Mike, EMNRD
Subject: RE: (C-141 Initial) G J West Coop Unit #161 Initial C-141 11-2-17 (30-015-35651)
Attachments: G J West Coop Unit #161 Initial C-141 11-2-17 (30-015-35651).pdf

Ok, let me try it again, lol. Sorry I am working on updating the volumes on the G J West Coop unit #11 also. Sorry for any confusion.

Thank You,

Becky Haskell
Senior HSE Coordinator
COG Operating LLC
600 W Illinois Avenue | Midland, TX 79701
Direct: 432-818-2372 | Main: 432.683.7443
Cell: 432-556-5130
rhaskell@concho.com



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From: Weaver, Crystal, EMNRD [mailto:Crystal.Weaver@state.nm.us]
Sent: Monday, November 06, 2017 12:46 PM
To: Rebecca Haskell; Amber Groves (agroves@SLO.state.nm.us)
Cc: Bratcher, Mike, EMNRD
Subject: [External] RE: (C-141 Initial) G J West Coop Unit #161 Initial C-141 11-2-17 (30-015-35651)

Becky,

I already have this initial C-141 for G J West Coop Unit #11 from the release that was documented to have been discovered on 10/15/17. However, I am thinking according to the titling you created, on your email below, that there may have been something that happened at the G J West Coop Unit #161 location on 11/2/17?

Please advise.

Thanks,

Crystal Weaver
Environmental Specialist

OCD – Artesia District II
811 S. 1st Street
Artesia, NM 88210
Office: 575-748-1283 ext. 101
Cell: 575-840-5963
Fax: 575-748-9720

From: Rebecca Haskell [<mailto:RHaskell@concho.com>]
Sent: Monday, November 6, 2017 11:37 AM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Amber Groves (agroves@SLO.state.nm.us)
<agroves@SLO.state.nm.us>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Subject: RE: (C-141 Initial) G J West Coop Unit #161 Initial C-141 11-2-17 (30-015-35651)

Ms. Weaver,

I guess I got ahead of myself, here you go.

Thank You,

Becky Haskell
Senior HSE Coordinator
COG Operating LLC
600 W Illinois Avenue | Midland, TX 79701
Direct: 432-818-2372 | Main: 432.683.7443
Cell: 432-556-5130
rhaskell@concho.com



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From: Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]
Sent: Monday, November 06, 2017 12:32 PM
To: Rebecca Haskell; Amber Groves (agroves@SLO.state.nm.us)
Cc: Bratcher, Mike, EMNRD
Subject: [External] RE: (C-141 Initial) G J West Coop Unit #161 Initial C-141 11-2-17 (30-015-35651)

**** External email. Use caution. ****

Hello Becky,

Nothing was attached according to the email I received.

Thank you,

Crystal Weaver

Environmental Specialist

OCD – Artesia District II

811 S. 1st Street

Artesia, NM 88210

Office: 575-748-1283 ext. 101

Cell: 575-840-5963

Fax: 575-748-9720

From: Rebecca Haskell [<mailto:RHaskell@concho.com>]

Sent: Monday, November 6, 2017 11:07 AM

To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Amber Groves (agroves@SLO.state.nm.us)
<agroves@SLO.state.nm.us>

Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>

Subject: (C-141 Initial) G J West Coop Unit #161 Initial C-141 11-2-17 (30-015-35651)

Ms. Weaver / Ms. Groves,

Please find the attached Initial C-141 for your consideration. If you have any questions or concerns please contact me.

Thank You,

Becky Haskell

Senior HSE Coordinator

COG Operating LLC

600 W Illinois Avenue | Midland, TX 79701

Direct: 432-818-2372 | Main: 432.683.7443

Cell: 432-556-5130

rhaskell@concho.com



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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:  _____ 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:  _____ 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: _____ Date: _____

Printed Name: _____ Title: _____

APPENDIX B

Regulatory Correspondence

From: Mann, Ryan
To: "Jennifer Knowlton"; Weaver, Crystal, EMNRD; Naranjo, Mark
Cc: Sheldon Hitchcock; Dakota Neel; Rebecca Haskell; DeAnn Grant; Maurice Foye; Kenny Seaver
Subject: RE: Concho GJ West Coop Unit #161 Work Plan * 30-015-35651 * 2RP-4478
Date: Tuesday, March 27, 2018 3:10:35 PM
Attachments: [image001.png](#)

NMSLO accepts this work plan pending any additional OCD requirements.

From: Jennifer Knowlton [mailto:jknowlton@hrlcomp.com]
Sent: Monday, March 26, 2018 8:47 PM
To: Crystal.Weaver@state.nm.us; Naranjo, Mark <MNaranjo@slo.state.nm.us>; Mann, Ryan <rmann@slo.state.nm.us>
Cc: Sheldon Hitchcock <SLHitchcock@concho.com>; Dakota Neel <DNeel2@concho.com>; Rebecca Haskell <RHaskell@concho.com>; DeAnn Grant <agrant@concho.com>; Maurice Foye <mfoye@hrlcomp.com>; Kenny Seaver <kseaver@hrlcomp.com>
Subject: Concho GJ West Coop Unit #161 Work Plan * 30-015-35651 * 2RP-4478

Ms. Weaver/ Mr. Naranjo,

On behalf on COG Operating, I have attached a work plan for the GJ West Coop Unit #161 for your consideration. Please feel free to contact me if you have any questions or concerns.

Thank you,

Jennifer Knowlton, PE | Regional Manager Permian Basin
HRL Compliance Solutions, Inc.

main 970.243.3271 | mobile 505-238-3588
[Web](#) | [vCard](#) | [Map](#) | ☐ | ☐



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For more information please visit <http://www.symanteccloud.com>

From: [Weaver, Crystal, EMNRD](#)
To: ["Jennifer Knowlton"](#); [Naranjo, Mark](#); [Mann, Ryan](#)
Cc: [Sheldon Hitchcock](#); [Dakota Neel](#); [Rebecca Haskell](#); [DeAnn Grant](#); [Maurice Foye](#); [Kenny Seaver](#)
Subject: RE: Concho GJ West Coop Unit #161 Work Plan * 30-015-35651 * 2RP-4478
Date: Thursday, April 26, 2018 4:19:00 PM

RE: COG * GJ West Coop Unit #161 Work Plan * 30-015-35651 * 2RP-4478

Hello all,

OCD has reviewed this work plan and it is approved with these two items needing clarification/additions.

- OCD will need the excavation for the area around sample point T-1 and T-3 to go thru surface till the 1' interval is reached.
- Also OCD is a little confused on what is proposed to be done at T-2. In the table it states that whatever is highlighted in green signifies the extent the excavation will go down to and for T-2 a depth down to 10' is highlighted in green, however in the write up it says "excavation will occur to a safe depth..." what does that mean? Please provide clarification on what that statement means cause it does not give a clear answer on what intentions on for that area.

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

If you have any questions or concerns, and for notification, please contact Mike Bratcher and/or myself in the District II Office.

Crystal Weaver

Environmental Specialist

OCD – Artesia District II

811 S. 1st Street

Artesia, NM 88210

Office: 575-748-1283 ext. 101

Cell: 575-840-5963

Fax: 575-748-9720

From: Jennifer Knowlton <jknowlton@hrlcomp.com>

Sent: Monday, March 26, 2018 8:47 PM

To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Naranjo, Mark <MNaranjo@slo.state.nm.us>; Mann, Ryan <rmann@slo.state.nm.us>
Cc: Sheldon Hitchcock <SLHitchcock@concho.com>; Dakota Neel <DNeel2@concho.com>; Rebecca Haskell <RHaskell@concho.com>; DeAnn Grant <agrant@concho.com>; Maurice Foye <mfoye@hrlcomp.com>; Kenny Seaver <kseaver@hrlcomp.com>
Subject: Concho GJ West Coop Unit #161 Work Plan * 30-015-35651 * 2RP-4478

Ms. Weaver/ Mr. Naranjo,

On behalf on COG Operating, I have attached a work plan for the GJ West Coop Unit #161 for your consideration. Please feel free to contact me if you have any questions or concerns.

Thank you,

Jennifer Knowlton, PE | Regional Manager Permian Basin
HRL Compliance Solutions, Inc.

main 970.243.3271 | mobile 505-238-3588

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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

QUESTIONS

Action 303979

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:	229137
	Action Number:	303979
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAB1731257717
Incident Name	NAB1731257717 G J WEST COOP UNIT #161 FL @ 30-015-35651
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Well	[30-015-35651] G J WEST COOP UNIT #161

Location of Release Source	
Please answer all the questions in this group.	
Site Name	G J WEST COOP UNIT #161 FL
Date Release Discovered	11/02/2017
Surface Owner	State

Incident Details	
Please answer all the questions in this group.	
Incident Type	Produced Water Release
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

Nature and Volume of Release	
Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.	
Crude Oil Released (bbls) Details	Cause: Corrosion Flow Line - Production Crude Oil Released: 1 BBL Recovered: 0 BBL Lost: 1 BBL.
Produced Water Released (bbls) Details	Cause: Corrosion Flow Line - Production Produced Water Released: 5 BBL Recovered: 3 BBL Lost: 2 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.

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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
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Santa Fe, NM 87505

QUESTIONS, Page 2

Action 303979

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:
	229137
	Action Number:
	303979
Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	No
Reasons why this would be considered a submission for a notification of a major release	Unavailable.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.	

Initial Response

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

The source of the release has been stopped	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	Not answered.

Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.

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

I hereby agree and sign off to the above statement	Name: Christian LLuLL Title: Project Manager Email: christian.llull@tetrattech.com Date: 01/16/2024
--	--

District I

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

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

QUESTIONS, Page 3

Action 303979

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:
	229137
	Action Number:
	303979
Action Type:	
[C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

QUESTIONS**Site Characterization**

Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 75 and 100 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Between 1000 (ft.) and ½ (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1000 (ft.) and ½ (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Greater than 5 (mi.)
Any other fresh water well or spring	Greater than 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 500 and 1000 (ft.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Between 500 and 1000 (ft.)
Categorize the risk of this well / site being in a karst geology	High
A 100-year floodplain	Between 500 and 1000 (ft.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan

Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

Requesting a remediation plan approval with this submission	Yes
Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No

Soil Contamination Sampling: (Provide the highest observable value for each, in milligrams per kilograms.)

Chloride (EPA 300.0 or SM4500 Cl B)	24200
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	9870
GRO+DRO (EPA SW-846 Method 8015M)	7550
BTEX (EPA SW-846 Method 8021B or 8260B)	155
Benzene (EPA SW-846 Method 8021B or 8260B)	0

Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.

On what estimated date will the remediation commence	06/28/2018
On what date will (or did) the final sampling or liner inspection occur	06/28/2018
On what date will (or was) the remediation complete(d)	06/28/2018
What is the estimated surface area (in square feet) that will be reclaimed	3880
What is the estimated volume (in cubic yards) that will be reclaimed	245
What is the estimated surface area (in square feet) that will be remediated	3880
What is the estimated volume (in cubic yards) that will be remediated	245

These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.

The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

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QUESTIONS, Page 4

Action 303979

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:	229137
	Action Number:	303979
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Remediation Plan (continued)	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:	
<i>(Select all answers below that apply.)</i>	
(Ex Situ) Excavation and off-site disposal (i.e. dig and haul, hydrovac, etc.)	Yes
Which OCD approved facility will be used for off-site disposal	HALFWAY DISPOSAL AND LANDFILL [fEEM0112334510]
OR which OCD approved well (API) will be used for off-site disposal	Not answered.
OR is the off-site disposal site, to be used, out-of-state	Not answered.
OR is the off-site disposal site, to be used, an NMED facility	Not answered.
(Ex Situ) Excavation and on-site remediation (i.e. On-Site Land Farms)	Not answered.
(In Situ) Soil Vapor Extraction	Not answered.
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	Not answered.
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	Not answered.
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	Not answered.
Ground Water Abatement pursuant to 19.15.30 NMAC	Not answered.
OTHER (Non-listed remedial process)	Not answered.
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
I hereby agree and sign off to the above statement	Name: Christian LLuLL Title: Project Manager Email: christian.llull@tetratech.com Date: 01/16/2024
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

District I
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District III
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Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
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QUESTIONS, Page 5

Action 303979

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 303979
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Deferral Requests Only	
Only answer the questions in this group if seeking a deferral upon approval this submission. Each of the following items must be confirmed as part of any request for deferral of remediation.	
Requesting a deferral of the remediation closure due date with the approval of this submission	No

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QUESTIONS, Page 6

Action 303979

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:	229137
	Action Number:	303979
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	303182
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	06/28/2018
What was the (estimated) number of samples that were to be gathered	8
What was the sampling surface area in square feet	3880

Remediation Closure Request

Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.

Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No
All areas reasonably needed for production or subsequent drilling operations have been stabilized, returned to the sites existing grade, and have a soil cover that prevents ponding of water, minimizing dust and erosion	Yes
What was the total surface area (in square feet) remediated	3880
What was the total volume (cubic yards) remediated	245
All areas not reasonably needed for production or subsequent drilling operations have been reclaimed to contain a minimum of four feet of non-waste contain earthen material with concentrations less than 600 mg/kg chlorides, 100 mg/kg TPH, 50 mg/kg BTEX, and 10 mg/kg Benzene	Yes
What was the total surface area (in square feet) reclaimed	3880
What was the total volume (in cubic yards) reclaimed	245
Summarize any additional remediation activities not included by answers (above)	na

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

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

I hereby agree and sign off to the above statement	Name: Christian LLuLL Title: Project Manager Email: christian.llull@tetrattech.com Date: 01/16/2024
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QUESTIONS, Page 7

Action 303979

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 303979
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Reclamation Report	
Only answer the questions in this group if all reclamation steps have been completed.	
Requesting a reclamation approval with this submission	No

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CONDITIONS

Action 303979

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 303979
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
amaxwell	Remediation Closure approved. All areas not reasonably needed for production or subsequent drilling operations will need to be reclaimed and revegetated as soon as practical. Areas reasonably needed for production or subsequent drilling operations will need to be reclaimed and revegetated as soon as they are no longer reasonably needed. A report for reclamation and revegetation will need to be submitted and approved prior to this incident receiving the final status of "Restoration Complete".	1/17/2024