



August 6, 2024

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

**Re: Liner Inspection and Closure Request  
ConocoPhillips  
Gin and Tectonic Federal 5 O South CTB Release  
Unit Letter O, Section 5, Township 24 South, Range 32 East  
Lea County, New Mexico  
Incident ID# NAPP2419036870**

Sir or Madam:

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips Company (COP) to assess a release associated with the Gin and Tectonic Federal 5 O South – Central Tank Battery (CTB) Release. The release footprint is located within Public Land Survey System (PLSS) Unit Letter O, Section 5, Township 24 South, Range 32 East, in Lea County, New Mexico (Site). The approximate release point occurred at coordinates 32.241951° -103.695056°, as shown on Figures 1 and 2.

## BACKGROUND

On July 8, 2024, COP submitted a Notification of Release (NOR) to the New Mexico Oil Conservation Division (NMOCD) online portal system for a release discovered on July 4, 2024. The cause of the release is indicated in the NOR as a gasket leak. According to correspondence with COP, the flowback operator found a seal leaking in the water tank while doing rounds and all produced water was reportedly captured in the secondary containment. The release was approximately 60 bbls of produced water, of which 100% was recovered via vacuum truck. Recent precipitation events may have contributed to the volume calculations reported. Following the NOR submittal the release was assigned the Incident ID NAPP2419036870. A Initial C-141 Form was submitted and approved on July 18, 2024. copy of the NMOCD initial C-141 is included in Appendix A.

## LAND OWNERSHIP

According to the NMOCD Oil and Gas Map, the site is located on federal lands managed by the BLM. A copy of this report will be provided to the BLM for concurrence.

## SITE CHARACTERIZATION

A site characterization was performed in accordance with 19.15.29.11 New Mexico State Administrative Code (NMAC) and the guidance document Process Updates re: Submissions of Form C-141 Release Notification and Corrective Actions (12/01/2023).

A summary of the site characterization is presented below:

|   |                                |
|---|--------------------------------|
| <b>Shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (feet bgs)</b> | <b>&lt; 50 feet bgs</b>        |
| <b>Method used to determine the depth to ground water</b>   | NM OSE iWaters Database Search |

Tetra Tech

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Liner Inspection and Closure Report  
August 6, 2024

ConocoPhillips

|   |            |
|---|------------|
| Did this release impact groundwater or surface water?   | No         |
| <b><u>The minimum distance between the closest lateral extents of the release and the following surface areas:</u></b>  |            |
| A continuously flowing watercourse or any other significant watercourse   | > 5 miles  |
| Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)                                       | 0.46 miles |
| An occupied permanent residence, school, hospital, institution, or church   | > 5 miles  |
| A spring or private domestic fresh water well used by less than five households for domestic or stock watering purposes | > 5 miles  |
| Any other fresh water well or spring  | > 5 miles  |
| Incorporated municipal boundaries or a defined municipal fresh water well field   | > 5 miles  |
| A wetland   | 0.46 miles |
| A subsurface mine   | > 5 miles  |
| A (non-karst) unstable area   | > 5 miles  |
| Categorized risk of this well / site being in a karst geology   | low        |
| A 100-year floodplain   | > 5 miles  |
| Did the release impact areas not on an exploration, development, production, or storage site?                           | No         |

According to the New Mexico Office of the State Engineers (NMOSE) reporting system, there are no water wells within ½ mile (800 meters) of the Site. There is one (1) water well within 1,189 meters of the Site with an average depth to groundwater of 380 feet below ground surface (bgs). The site characterization data is included in Appendix B.

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

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

## LINER INTEGRITY

In accordance with 19.15.29.11(A)(5)(a) NMAC, notification (C-141L) of a liner inspection at the Gin and Tectonic Federal 5 O South – Central Tank Battery was submitted via the NMOCD portal on July 22, 2024. The liner inspection notification email is included in Appendix C.

Liner Inspection and Closure Report  
August 6, 2024

ConocoPhillips

Prior to conducting the liner inspection, ConocoPhillips representatives pressure washed the liner on July 17, 2024. Photographic documentation following the pressure washing activities are included in Appendix D. On July 25, 2024, Tetra Tech personnel performed an inspection of the liner within the containment area of the Gin and Tectonic Federal 5 O South CTB Tank Battery. This work was completed to verify the integrity of the liner. The liner was observed to underlie the entirety of the tank battery containment area. The liner was intact with no visible rips or tears and encompassed by an approximately 2-foot-tall muscle wall. The liner extended up the muscle wall and was anchored on the interior. At the time of the inspection, the liner was intact and had the ability to contain the documented release. Photographic documentation of the liner inspection is included in Appendix D.

This portion of Lea County (area of the Gin and Tectonic Federal 5 O South CTB) experienced multiple rain events after the initial cleaning but prior to the official liner inspection. Photographs of the liner during the inspection indicate areas of standing rainwater from these weather events. It should be recognized that photographs collected after the pressure washing activities indicate no fluids on the liners as these activities occurred prior to the rain events. Nonetheless, the standing fluid observed in the official liner inspection photographs lend further evidence to the integrity of the liner as a competent fluid barrier.

## CONCLUSION

Based on the results of the liner inspection, COP respectfully requests closure of the subject line incident. The release occurred within a lined containment area. The liner integrity demonstration is complete. The affected area of the liner has been visually inspected where the release occurred, and the liner remains intact and had the ability to contain the leak in question. Two business days' notice (C-141L) was provided to the appropriate division district office before conducting the liner inspection.

The final C-141 forms are enclosed in Appendix A. If you have any questions concerning the liner inspection for the Site, please call me at (512) 596-8201 or Christian at (512) 338-2861.

Sincerely,

**Tetra Tech, Inc.**



Lisbeth Chavira  
Staff Geoscientist



Christian M. Llull, P.G.  
Program Manager

cc:

Mr. Jacob Laird, PBU - ConocoPhillips

## LIST OF ATTACHMENTS

### Figures:

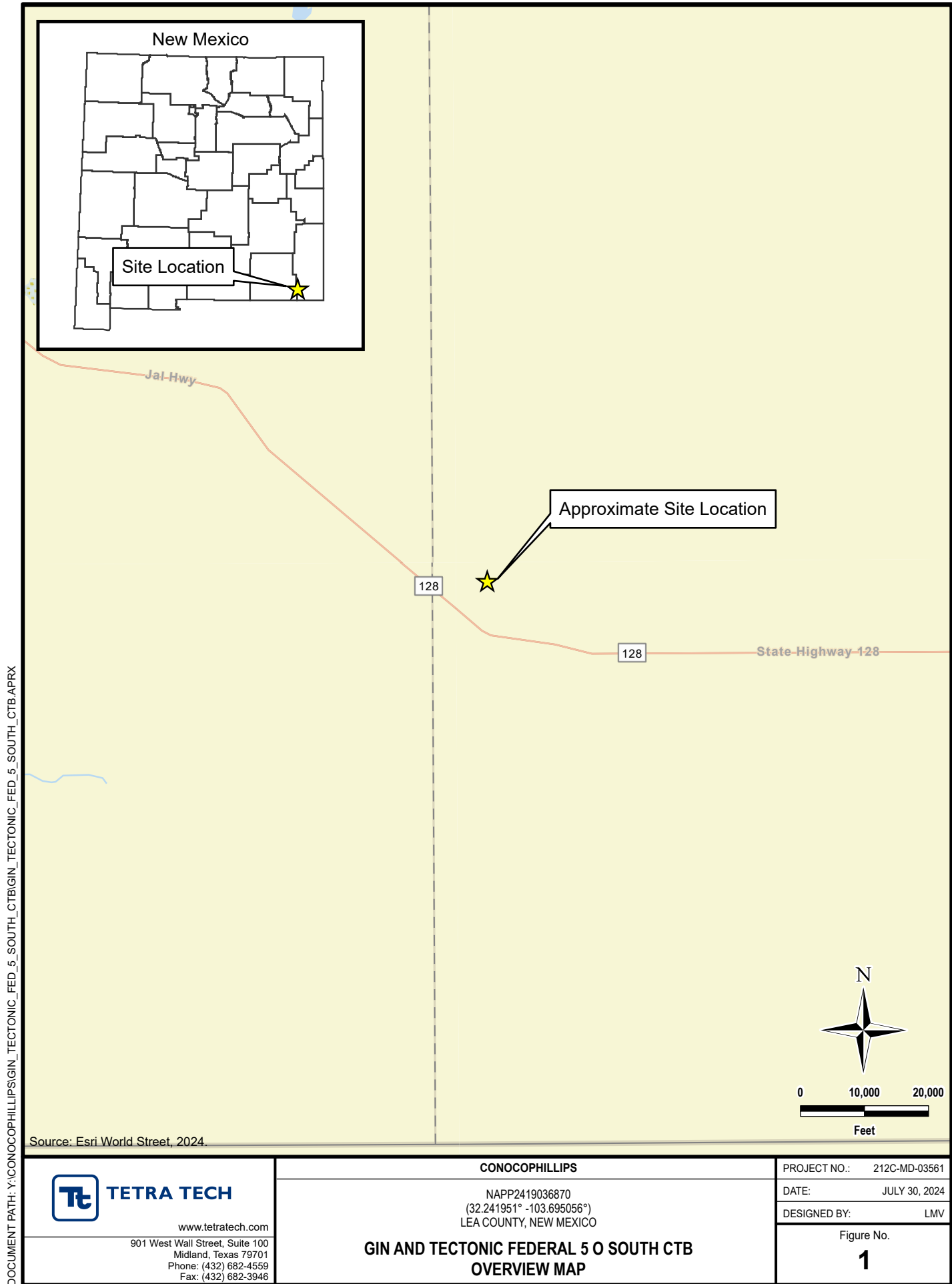
- Figure 1 – Overview Map
- Figure 2 – Topographic Map
- Figure 3 – Approximate Release Extent and Liner Inspection

### Appendices:

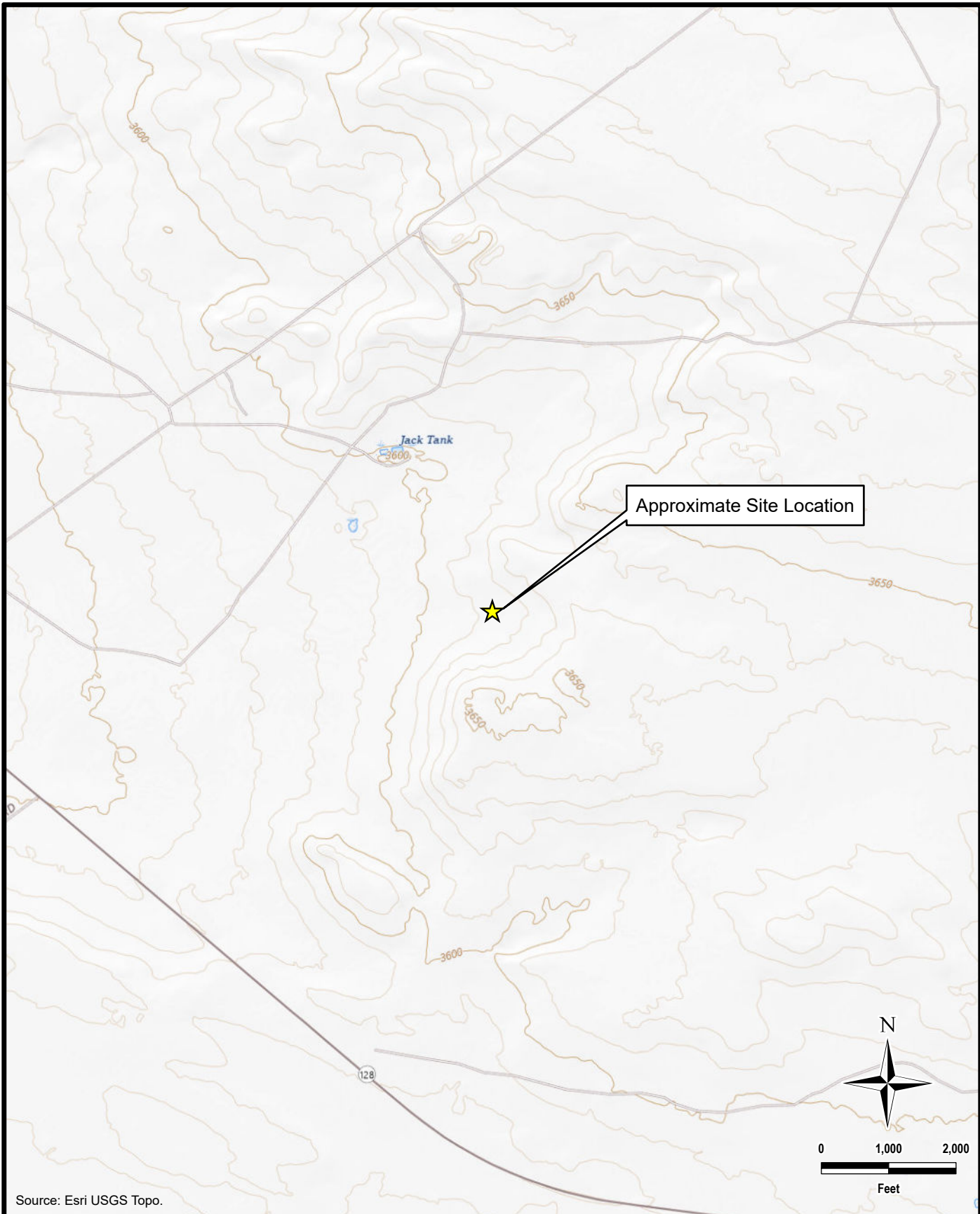
- Appendix A – C-141 Forms
- Appendix B – Site Characterization Data
- Appendix C – Regulatory Correspondence
- Appendix D – Photographic Documentation



## **FIGURES**



DOCUMENT PATH: Y:\CONOCOPHILLIPS\GIN\_TECTONIC\_FED\_5\_SOUTH\_CTB\GIN\_TECTONIC\_FED\_5\_SOUTH\_CTB.APRX



Source: Esri USGS Topo.



**TETRA TECH**

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**CONOCOPHILLIPS**

NAPP2419036870  
(32.241951° -103.695056°)  
LEA COUNTY, NEW MEXICO

**GIN AND TECTONIC FEDERAL 5 O SOUTH CTB  
TOPOGRAPHIC MAP**

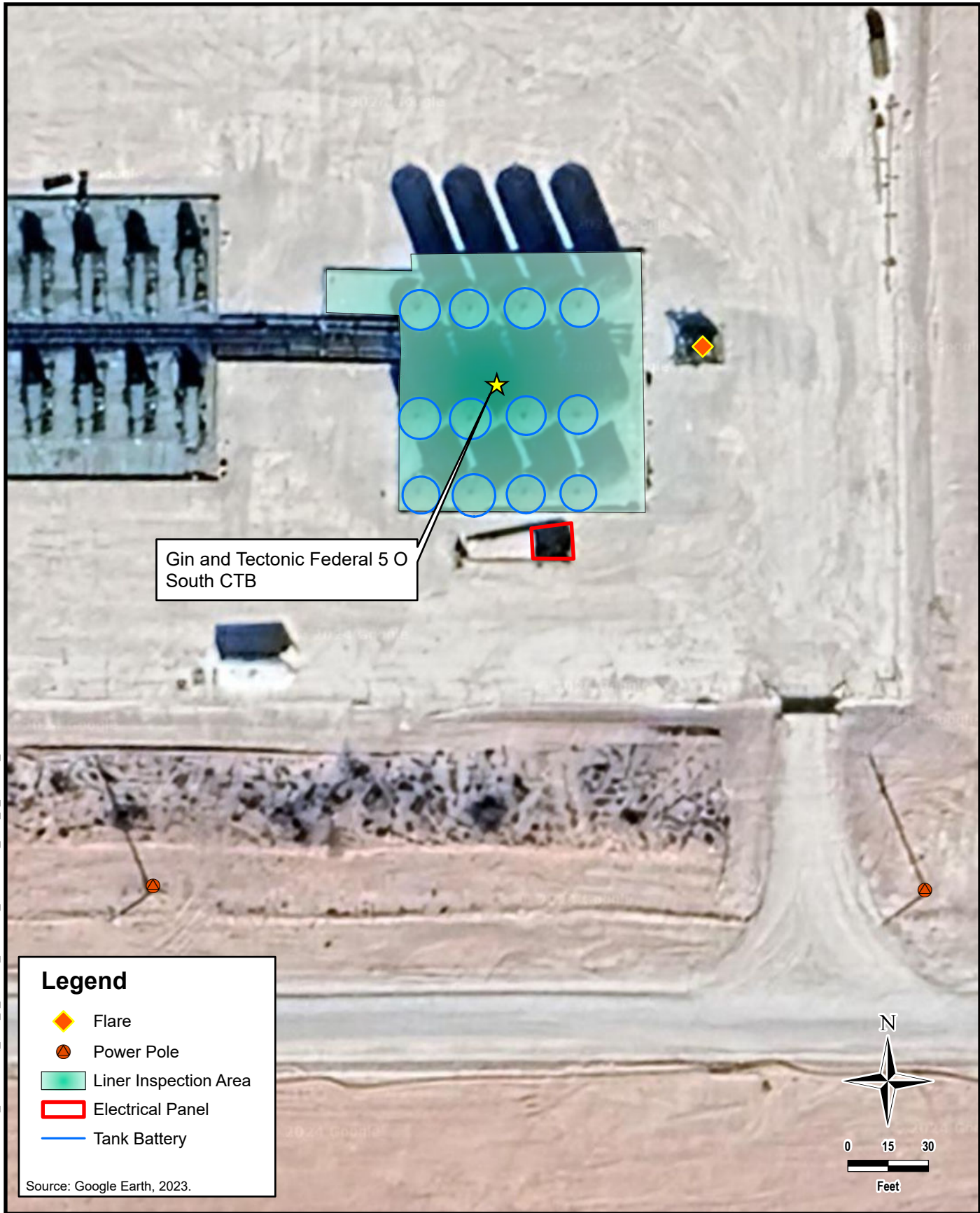
PROJECT NO.: 212C-MD-03561

DATE: JULY 30, 2024

DESIGNED BY: LMV

Figure No.

**2**



### Legend

- Flare
- Power Pole
- Liner Inspection Area
- Electrical Panel
- Tank Battery

Source: Google Earth, 2023.



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**CONOCOPHILLIPS**

NAPP2419036870  
(32.241951° -103.695056°)  
LEA COUNTY, NEW MEXICO

**GIN AND TECTONIC FEDERAL 5 O SOUTH CTB  
APPROXIMATE RELEASE EXTENT AND LINER INSPECTION AREA**

PROJECT NO.: 212C-MD-03561

DATE: JULY 31, 2024

DESIGNED BY: LMV

Figure No.

**3**

## **APPENDIX A C-141 Forms**

**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

QUESTIONS

Action 365272

QUESTIONS

|   |   |
|---|---|
| Operator:<br>COG OPERATING LLC<br>600 W Illinois Ave<br>Midland, TX 79701 | OGRID:<br>229137  |
|   | Action Number:<br>365272                                |
|   | Action Type:<br>[C-141] Initial C-141 (C-141-v-Initial) |

QUESTIONS

|                   |   |
|-------------------|---|
| Prerequisites     |   |
| Incident ID (n#)  | nAPP2419036870  |
| Incident Name     | NAPP2419036870 GIN AND TECTONIC FEDERAL 5 O SOUTH CTB @ 0 |
| Incident Type     | Produced Water Release                                    |
| Incident Status   | Initial C-141 Received                                    |
| Incident Facility | [APP2417647408] GIN AND TECTONIC FED 5 O SOUTH CTB        |

|  |  |
|--|--|
| Location of Release Source                     |  |
| Please answer all the questions in this group. |  |
| Site Name                                      | Gin and Tectonic Federal 5 O South CTB |
| Date Release Discovered                        | 07/04/2024                             |
| Surface Owner                                  | Federal                                |

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

|  |  |
|--|--|
| Nature and Volume of Release   |  |
| Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission. |  |
| Crude Oil Released (bbls) Details  | Not answered.  |
| Produced Water Released (bbls) Details   | Cause: Other   Gasket   Produced Water   Released: 60 BBL   Recovered: 60 BBL   Lost: 0 BBL. |
| Is the concentration of chloride in the produced water >10,000 mg/l  | Yes  |
| Condensate Released (bbls) Details   | Not answered.  |
| Natural Gas Vented (Mcf) Details   | Not answered.  |
| Natural Gas Flared (Mcf) Details   | Not answered.  |
| Other Released Details   | Not answered.  |
| Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)                                 | Not answered.  |



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

QUESTIONS, Page 2  
  
Action 365272

QUESTIONS (continued)

|   |   |
|---|---|
| Operator:<br>COG OPERATING LLC<br>600 W Illinois Ave<br>Midland, TX 79701 | OGRID:<br>229137  |
|   | Action Number:<br>365272                                |
|   | Action Type:<br>[C-141] Initial C-141 (C-141-v-Initial) |

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  | Yes  |
| Reasons why this would be considered a submission for a notification of a major release   | From paragraph A. "Major release" determine using:<br>(1) an unauthorized release of a volume, excluding gases, of 25 barrels or more. |
| 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   | The release was initially communicated, coinciding with the extended holiday weekend of July 4th. |

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: Brittany Esparza<br>Title: Environmental Technician<br>Email: brittany.Esparza@ConocoPhillips.com<br>Date: 07/18/2024 |
|--|---|

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State of New Mexico

Energy, Minerals and Natural Resources

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Santa Fe, NM 87505

QUESTIONS, Page 3

Action 365272

QUESTIONS (continued)

|   |   |
|---|---|
| Operator:<br>COG OPERATING LLC<br>600 W Illinois Ave<br>Midland, TX 79701 | OGRID:<br>229137  |
|   | Action Number:<br>365272                                |
|   | Action Type:<br>[C-141] Initial C-141 (C-141-v-Initial) |

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) | Not answered. |
| What method was used to determine the depth to ground water  | Not answered. |
| Did this release impact groundwater or surface water   | Not answered. |
| 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  | Not answered. |
| Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)  | Not answered. |
| An occupied permanent residence, school, hospital, institution, or church  | Not answered. |
| A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes  | Not answered. |
| Any other fresh water well or spring   | Not answered. |
| Incorporated municipal boundaries or a defined municipal fresh water well field  | Not answered. |
| A wetland  | Not answered. |
| A subsurface mine  | Not answered. |
| An (non-karst) unstable area   | Not answered. |
| Categorize the risk of this well / site being in a karst geology   | Not answered. |
| A 100-year floodplain  | Not answered. |
| Did the release impact areas not on an exploration, development, production, or storage site                               | Not answered. |

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 | No |
|---|----|

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.



| Convert Irregular shape into a series of rectangles | Length (ft.) | Width (ft.) | Average Depth (in.) | Estimated <u>Pool</u> Area (sq. ft.) | Estimated volume of each pool area (bbl.) | Penetration allowance (ft.) | Total Estimated Volume of Spill (bbl.) |
|---|--------------|-------------|---------------------|--------------------------------------|---|-----------------------------|--|
| Rectangle A   | 90           | 95          | 0.5                 | 8505.00                              | 63.08                                     | 0.00                        | 63.21                                  |
| Rectangle B   |              |             |                     | 0.00                                 | 0.00                                      | 0.00                        | 0.00                                   |
| Rectangle C   |              |             |                     | 0.00                                 | 0.00                                      | 0.00                        | 0.00                                   |
| Rectangle D   |              |             |                     | 0.00                                 | 0.00                                      | 0.00                        | 0.00                                   |
| Rectangle E   |              |             |                     | 0.00                                 | 0.00                                      | 0.00                        | 0.00                                   |
| Rectangle F   |              |             |                     | 0.00                                 | 0.00                                      | 0.00                        | 0.00                                   |
| Rectangle G   |              |             |                     | 0.00                                 | 0.00                                      | 0.00                        | 0.00                                   |
| Rectangle H   |              |             |                     | 0.00                                 | 0.00                                      | 0.00                        | 0.00                                   |
| Rectangle I   |              |             |                     | 0.00                                 | 0.00                                      | 0.00                        | 0.00                                   |
| Rectangle J   |              |             |                     | 0.00                                 | 0.00                                      | 0.00                        | 0.00                                   |

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CONDITIONS

Action 365272

CONDITIONS

|   |   |
|---|---|
| Operator:<br>COG OPERATING LLC<br>600 W Illinois Ave<br>Midland, TX 79701 | OGRID:<br>229137  |
|   | Action Number:<br>365272                                |
|   | Action Type:<br>[C-141] Initial C-141 (C-141-v-Initial) |

CONDITIONS

|            |           |                |
|------------|-----------|----------------|
| Created By | Condition | Condition Date |
| scwells    | None      | 7/18/2024      |

|                |  |
|----------------|--|
| Incident ID    |  |
| District RP    |  |
| Facility ID    |  |
| Application ID |  |

## Site Assessment/Characterization

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

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

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

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

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

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

State of New Mexico  
Oil Conservation Division

Page 4

|                |  |
|----------------|--|
| Incident ID    |  |
| District RP    |  |
| Facility ID    |  |
| Application ID |  |

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

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

Signature: Jacob Laird 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: Jacob Laird 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**

### **Site Characterization Data**



# New Mexico Office of the State Engineer

## Water Column/Average Depth to Water

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

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

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

(quarters are smallest to largest)

(NAD83 UTM in meters)

(In feet)

| POD Number                   | POD Sub-Code | basin | County | Q 64 | Q 16 | Q 4 | Sec | Tws | Rng | X      | Y       | Distance | Depth Well | Depth Water | Water Column |
|------------------------------|--------------|-------|--------|------|------|-----|-----|-----|-----|--------|---------|----------|------------|-------------|--------------|
| <a href="#">C 04775 POD1</a> | CUB          | LE    |        | 4    | 4    | 4   | 06  | 24S | 32E | 621789 | 3567860 | 1148     | 105        |             |              |
| <a href="#">C 03555 POD1</a> | C            | LE    |        | 2    | 2    | 1   | 05  | 24S | 32E | 622748 | 3569233 | 1189     | 600        | 380         | 220          |

Average Depth to Water: **380 feet**

Minimum Depth: **380 feet**

Maximum Depth: **380 feet**

Record Count: 2

### UTMNAD83 Radius Search (in meters):

**Easting (X):** 622921.28

**Northing (Y):** 3568056.83

**Radius:** 2500

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.

7/17/24 2:24 PM

Page 1 of 1

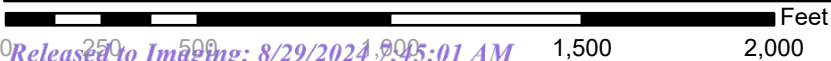
WATER COLUMN/ AVERAGE  
DEPTH TO WATER



# National Flood Hazard Layer FIRMMette



103°42'2"W 32°14'48"N



1:6,000

103°41'24"W 32°14'17"N

## Legend

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

|                             |  |   |
|-----------------------------|--|---|
| SPECIAL FLOOD HAZARD AREAS  |  | Without Base Flood Elevation (BFE)<br>Zone A, V, A99  |
|                             |  | With BFE or Depth Zone AE, AO, AH, VE, AR   |
|                             |  | Regulatory Floodway   |
| OTHER AREAS OF FLOOD HAZARD |  | 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X |
|                             |  | Future Conditions 1% Annual Chance Flood Hazard Zone X  |
|                             |  | Area with Reduced Flood Risk due to Levee. See Notes. Zone X  |
|                             |  | Area with Flood Risk due to Levee Zone D  |
| OTHER AREAS                 |  | NO SCREEN Area of Minimal Flood Hazard Zone X   |
|                             |  | Effective LOMRs   |
|                             |  | Area of Undetermined Flood Hazard Zone D  |
| GENERAL STRUCTURES          |  | Channel, Culvert, or Storm Sewer  |
|                             |  | Levee, Dike, or Floodwall   |
| OTHER FEATURES              |  | 20.2 Cross Sections with 1% Annual Chance Water Surface Elevation   |
|                             |  | 17.5 Coastal Transect   |
|                             |  | Base Flood Elevation Line (BFE)   |
|                             |  | Limit of Study  |
|                             |  | Jurisdiction Boundary   |
|                             |  | Coastal Transect Baseline   |
|                             |  | Profile Baseline  |
| MAP PANELS                  |  | Digital Data Available  |
|                             |  | No Digital Data Available   |
|                             |  | Unmapped  |



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

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

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 7/17/2024 at 4:16 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

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



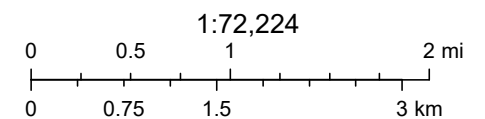
## OCD Induced Seismicity Area



7/17/2024, 3:13:45 PM

Seismic Response 3.0 to 3.4

10 mi.

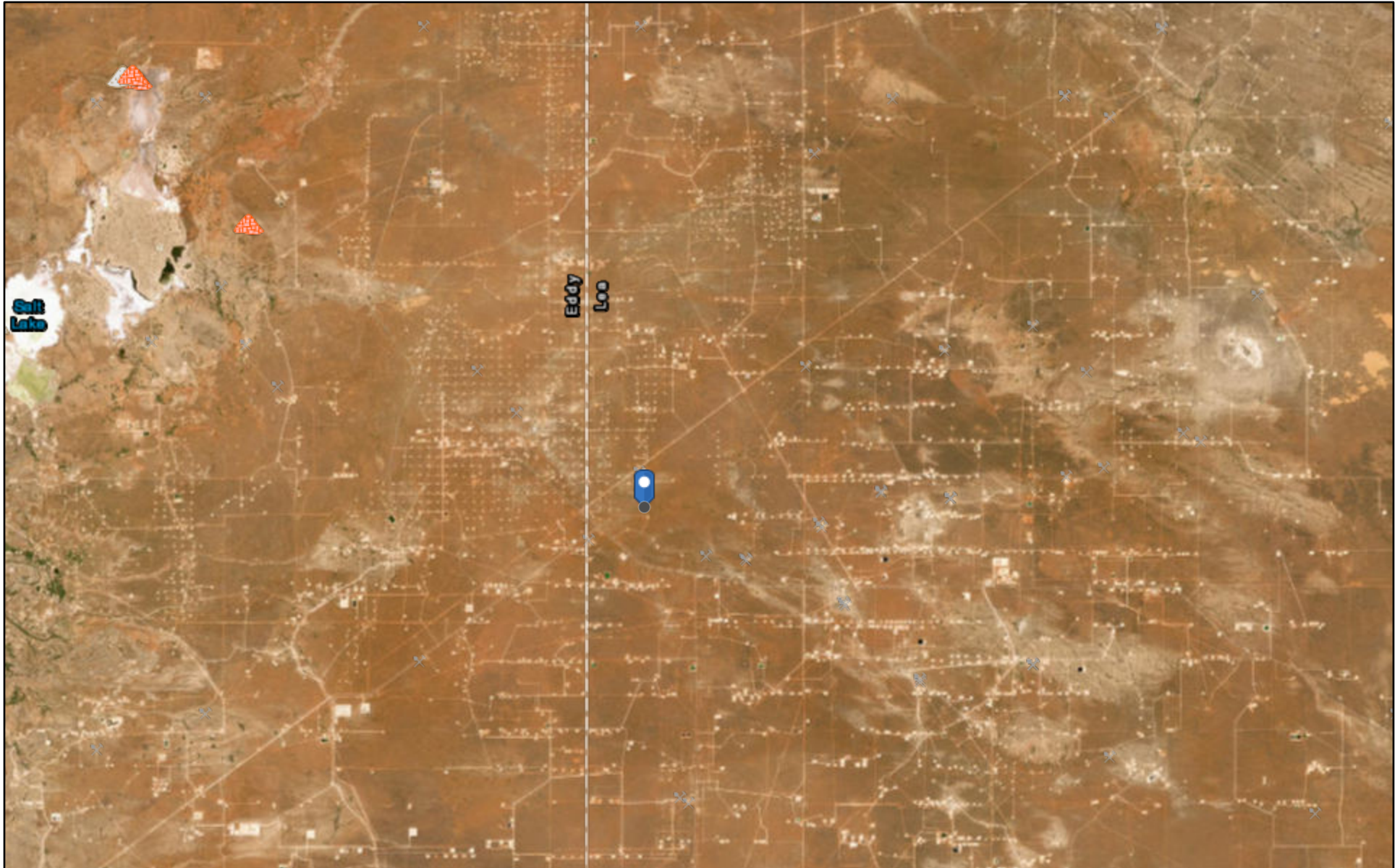


Oil Conservation Division (OCD), Energy, Minerals and Natural Resources Department (EMNRD), Esri, HERE, Garmin, Earthstar Geographics

New Mexico Oil Conservation Division



## EMNRD Active Mines



7/17/2024, 3:15:25 PM

Registered Mines

Aggregate, Stone etc.



Aggregate, Stone etc.



Aggregate, Stone etc.

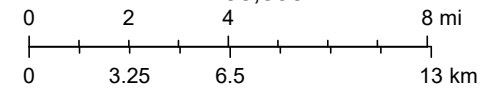


Potash



Salt

1:288,895



Esri, HERE, Garmin, Earthstar Geographics



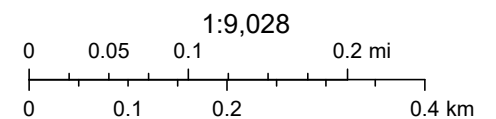
## OCD Karst Areas



7/17/2024, 3:09:21 PM

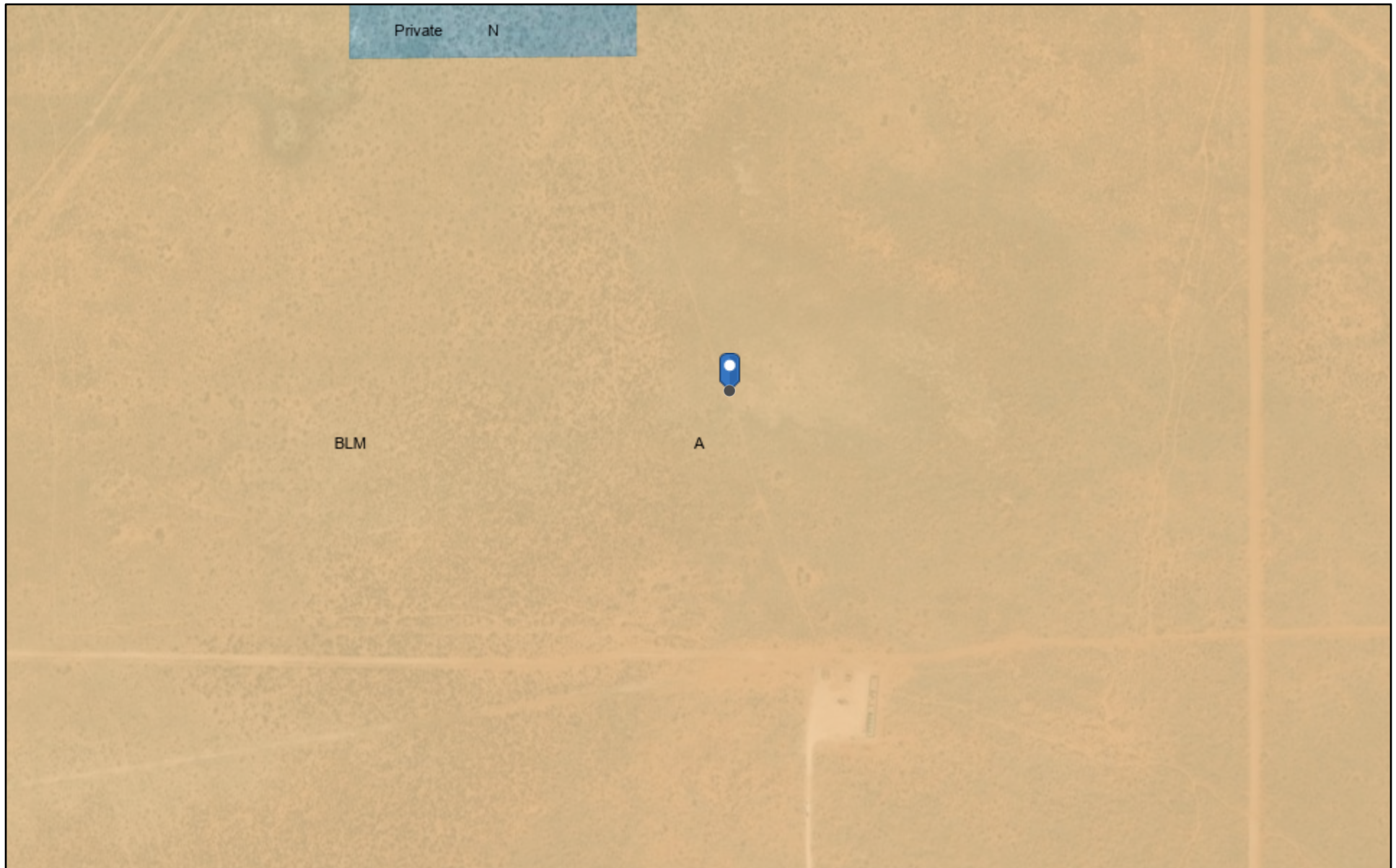
Karst Occurrence Potential

Low



BLM, OCD, New Mexico Tech, Esri, HERE, Garmin, IPC, Maxar

# OCD Land Ownership



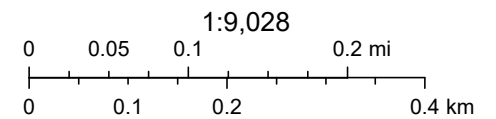
7/17/2024, 3:05:42 PM

## Mineral Ownership

- A-All minerals are owned by U.S.
- N-No minerals are owned by the U.S.

## Land Ownership

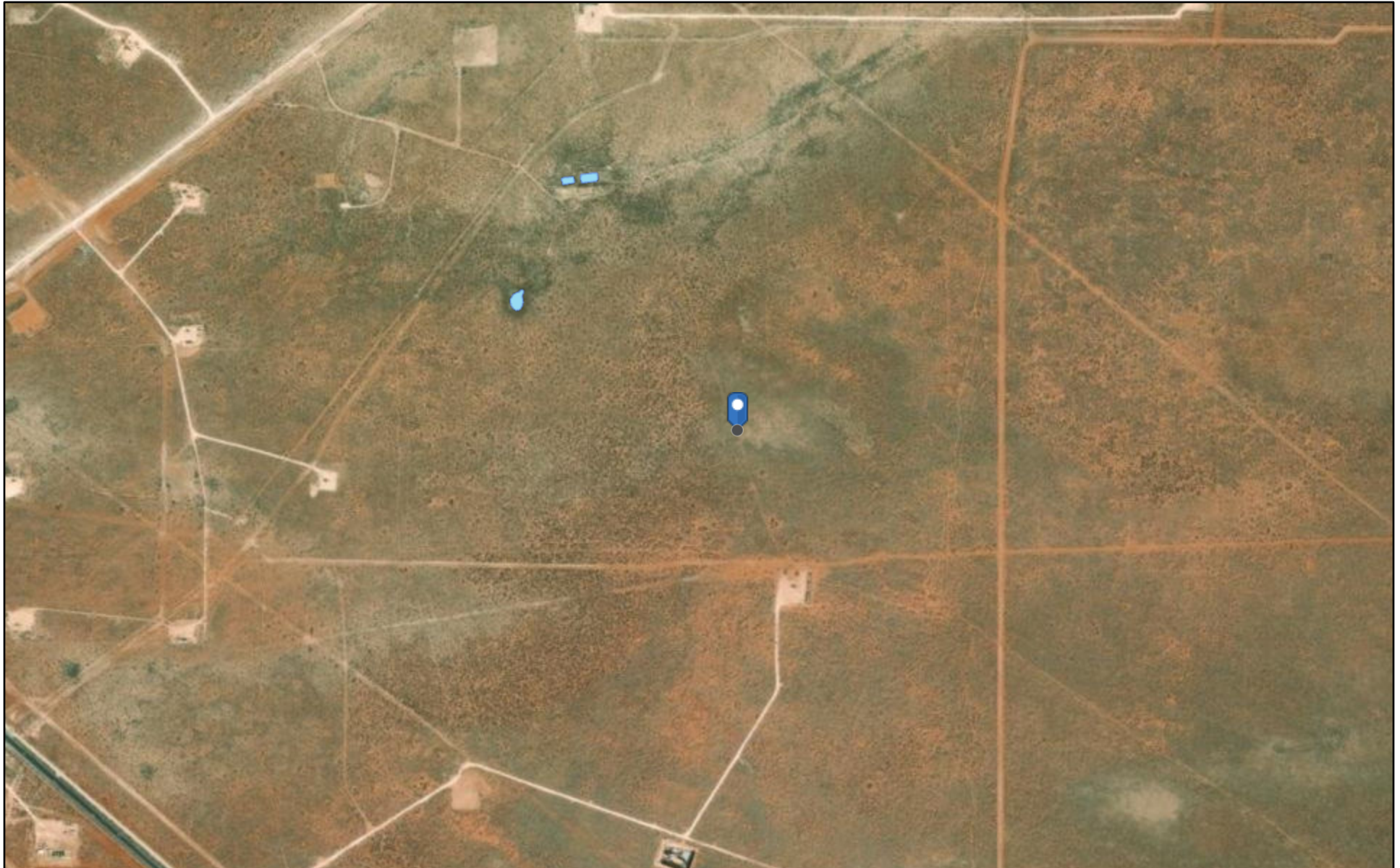
- BLM
- P



U.S. BLM, Esri, HERE, Garmin, iPC, Maxar

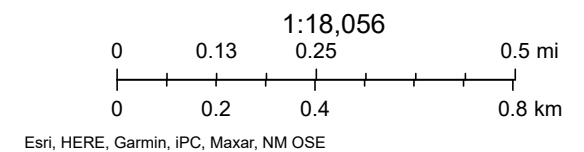


# OCD Water Bodys



7/17/2024, 3:10:32 PM

 OSW Water Bodys







## National Wetlands Inventory



July 17, 2024

**Wetlands**

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond

- Lake
- Other
- Riverine

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

## **APPENDIX C**

### **Regulatory Correspondence**

**Chavira, Lisbeth**

---

**From:** OCDOnline@state.nm.us  
**Sent:** Monday, July 22, 2024 4:34 PM  
**To:** Llull, Christian  
**Subject:** The Oil Conservation Division (OCD) has accepted the application, Application ID: 366226

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

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

The OCD has received the submitted *Notification for Liner Inspection for a Release* (C-141L), for incident ID (n#) nAPP2419036870.

The liner inspection is expected to take place:

**When:** 07/25/2024 @ 10:00

**Where:** O-05-24S-32E 0 FNL 0 FEL (32.2423,-103.6953)

**Additional Information:** Contact Lisbeth at 512-596-8201

**Additional Instructions:** INCIDENT ID: NAPP2419036870

Approximate Release Point: 32.241951° -103.695056

An OCD representative may be available onsite at the date and time reported. In the absence or presence of an OCD representative, liner inspection pursuant to 19.15.29.11.A(5)(a) NMAC is required. Should there be a change in the scheduled date and time of the sampling event, then another notification should be resubmitted through OCD permitting as soon as possible.

- **Failure to notify the OCD of liner inspections including any changes in date/time per the requirements of 19.15.29.11.A(5)(a)(ii) NMAC, may result in the inspection not being accepted.**

If you have any questions regarding this application, or don't know why you have received this email, please contact us.

**New Mexico Energy, Minerals and Natural Resources Department**

1220 South St. Francis Drive  
Santa Fe, NM 87505



## **APPENDIX D**

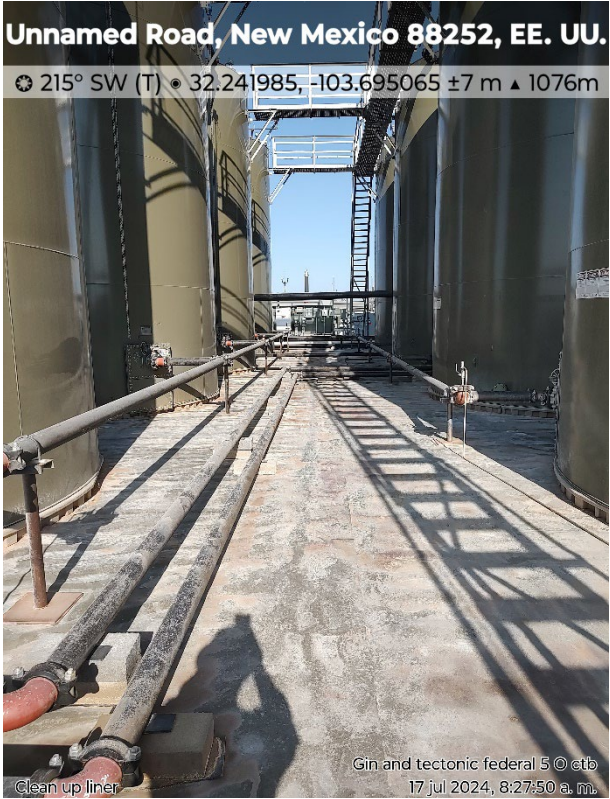
# **Photographic Documentation**



|  |             |  |   |
|--|-------------|--|---|
| TETRA TECH, INC.<br>PROJECT NO.<br>212C-MD-03561 | DESCRIPTION | View of approximate release point.             | 1 |
|  | SITE NAME   | Gin and Tectonic Federal 5 O South CTB Release |   |



|  |             |  |           |
|--|-------------|--|-----------|
| TETRA TECH, INC.<br>PROJECT NO.<br>212C-MD-03561 | DESCRIPTION | Site Signage.                                  | 2         |
|  | SITE NAME   | Gin and Tectonic Federal 5 O South CTB Release | 7/17/2024 |

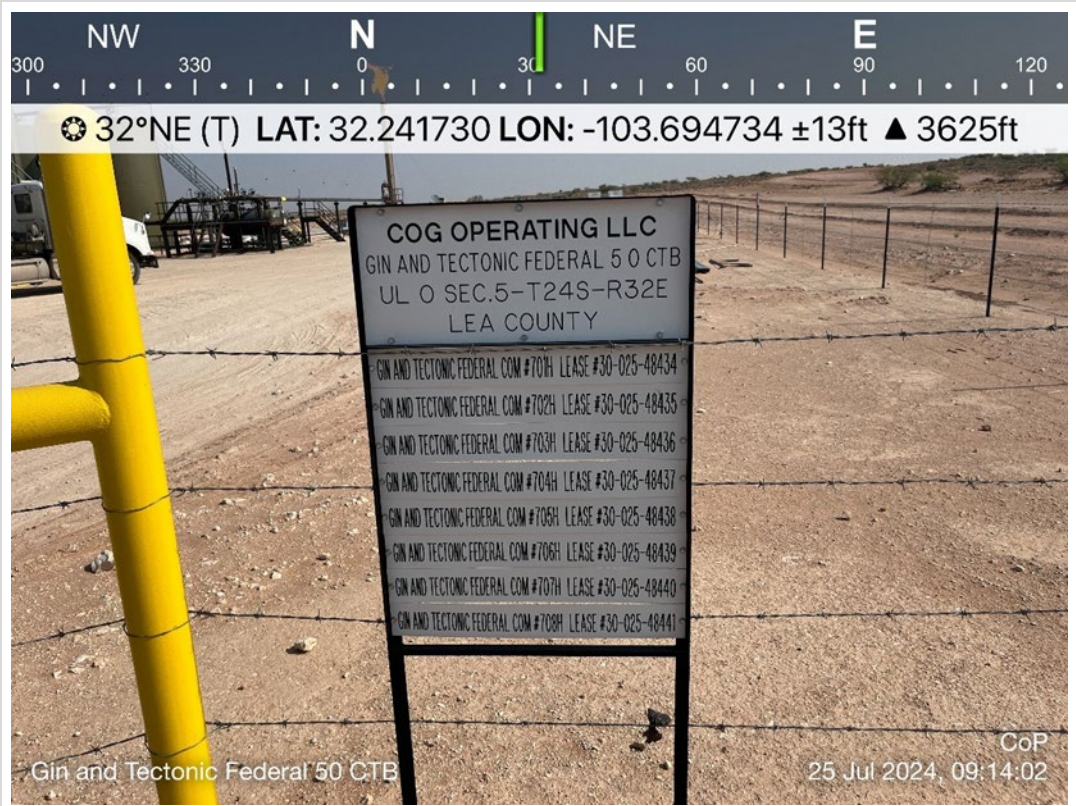


|  |             |   |           |
|--|-------------|---|-----------|
| TETRA TECH, INC.<br>PROJECT NO.<br>212C-MD-03561 | DESCRIPTION | View southwest. View of liner following pressure washing activities | 3         |
|  | SITE NAME   | Gin and Tectonic Federal 5 O South CTB Release                      | 7/17/2024 |



|  |             |  |           |
|--|-------------|--|-----------|
| TETRA TECH, INC.<br>PROJECT NO.<br>212C-MD-03561 | DESCRIPTION | View southeast. View of liner following pressure washing activities. | 4         |
|  | SITE NAME   | Gin and Tectonic Federal 5 O South CTB Release                       | 7/25/2024 |





|  |             |  |           |
|--|-------------|--|-----------|
| TETRA TECH, INC.<br>PROJECT NO.<br>212C-MD-03561 | DESCRIPTION | View of site signage.                          | 17        |
|  | SITE NAME   | Gin and Tectonic Federal 5 O South CTB Release | 7/25/2024 |



|  |             |  |           |
|--|-------------|--|-----------|
| TETRA TECH, INC.<br>PROJECT NO.<br>212C-MD-03561 | DESCRIPTION | View north. View of facility.                  | 5         |
|  | SITE NAME   | Gin and Tectonic Federal 5 O South CTB Release | 7/25/2024 |





|  |             |  |           |
|--|-------------|--|-----------|
| TETRA TECH, INC.<br>PROJECT NO.<br>212C-MD-03561 | DESCRIPTION | View east. View of liner and ponded rainwater. View of facility and equipment. | 6         |
|  | SITE NAME   | Gin and Tectonic Federal 5 O South CTB Release                                 | 7/25/2024 |



|  |             |  |           |
|--|-------------|--|-----------|
| TETRA TECH, INC.<br>PROJECT NO.<br>212C-MD-03561 | DESCRIPTION | View north. View of liner integrity.           | 7         |
|  | SITE NAME   | Gin and Tectonic Federal 5 O South CTB Release | 7/25/2024 |





|  |             |   |           |
|--|-------------|---|-----------|
| TETRA TECH, INC.<br>PROJECT NO.<br>212C-MD-03561 | DESCRIPTION | View south southwest. View of liner integrity. View of facility conditions. | 8         |
|  | SITE NAME   | Gin and Tectonic Federal 5 O South CTB Release                              | 7/25/2024 |



|  |             |   |           |
|--|-------------|---|-----------|
| TETRA TECH, INC.<br>PROJECT NO.<br>212C-MD-03561 | DESCRIPTION | View south. View of liner and ponded rainwater. View of facility and equipment. | 9         |
|  | SITE NAME   | Gin and Tectonic Federal 5 O South CTB Release                                  | 7/25/2024 |





|  |             |   |           |
|--|-------------|---|-----------|
| TETRA TECH, INC.<br>PROJECT NO.<br>212C-MD-03561 | DESCRIPTION | View east. View of liner integrity and muscle wall. No staining observed outside of the lined facility. | 10        |
|  | SITE NAME   | Gin and Tectonic Federal 5 O South CTB Release  | 7/25/2024 |



|  |             |  |           |
|--|-------------|--|-----------|
| TETRA TECH, INC.<br>PROJECT NO.<br>212C-MD-03561 | DESCRIPTION | View west. View of liner integrity and ponded rainwater. View of facility and equipment. | 11        |
|  | SITE NAME   | Gin and Tectonic Federal 5 O South CTB Release   | 7/25/2024 |





|  |             |   |           |
|--|-------------|---|-----------|
| TETRA TECH, INC.<br>PROJECT NO.<br>212C-MD-03561 | DESCRIPTION | View south. View of liner integrity. No rips or tears observed. | 12        |
|  | SITE NAME   | Gin and Tectonic Federal 5 O South CTB Release                  | 7/25/2024 |



|  |             |   |           |
|--|-------------|---|-----------|
| TETRA TECH, INC.<br>PROJECT NO.<br>212C-MD-03561 | DESCRIPTION | View southeast. View of liner integrity and ponded rainwater. View of facility and equipment. | 13        |
|  | SITE NAME   | Gin and Tectonic Federal 5 O South CTB Release  | 7/25/2024 |





|  |             |  |           |
|--|-------------|--|-----------|
| TETRA TECH, INC.<br>PROJECT NO.<br>212C-MD-03561 | DESCRIPTION | View west. View of liner integrity and muscle wall. No staining observed outside of the lined facility. Ponded rainwater observed. | 14        |
|  | SITE NAME   | Gin and Tectonic Federal 5 O South CTB Release   | 7/25/2024 |

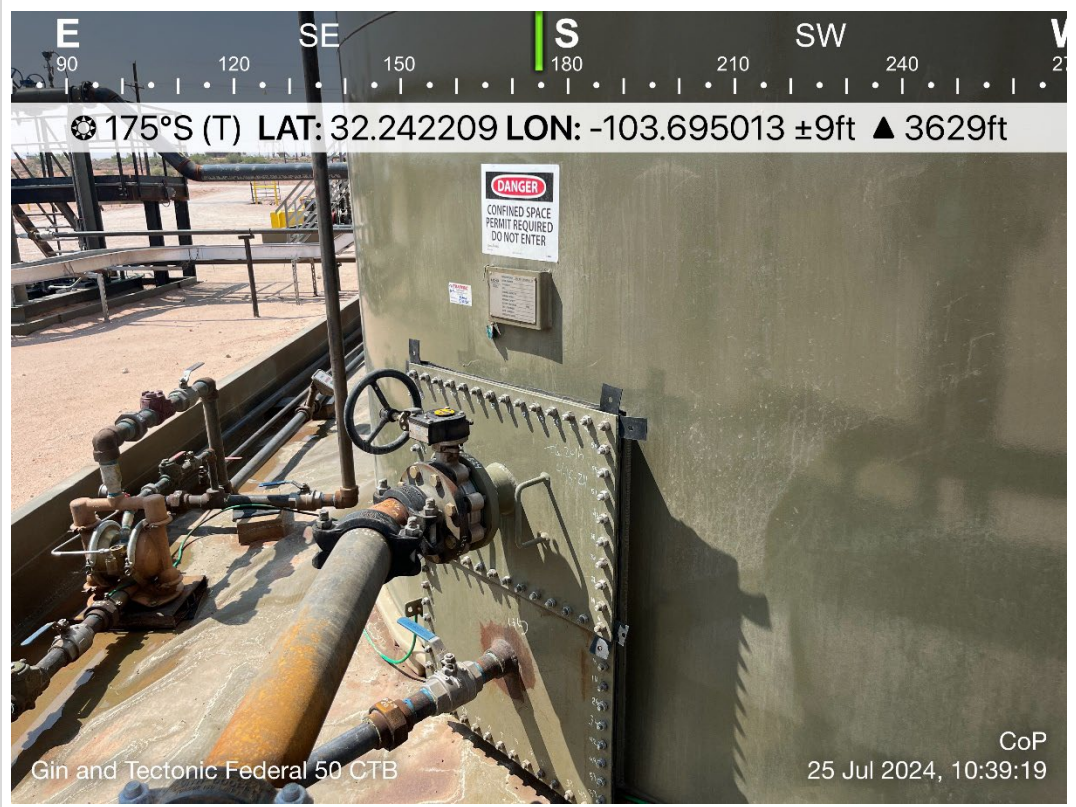


|  |             |  |           |
|--|-------------|--|-----------|
| TETRA TECH, INC.<br>PROJECT NO.<br>212C-MD-03561 | DESCRIPTION | View west. View of liner integrity. No rips or tears observed. Rainwater observed. | 15        |
|  | SITE NAME   | Gin and Tectonic Federal 5 O South CTB Release                                     | 7/25/2024 |





|  |             |  |           |
|--|-------------|--|-----------|
| TETRA TECH, INC.<br>PROJECT NO.<br>212C-MD-03561 | DESCRIPTION | View north. View of muscle wall. No staining observed outside of the lined facility. | 16        |
|  | SITE NAME   | Gin and Tectonic Federal 5 O South CTB Release                                       | 7/25/2024 |



|  |             |  |           |
|--|-------------|--|-----------|
| TETRA TECH, INC.<br>PROJECT NO.<br>212C-MD-03561 | DESCRIPTION | View south. View of liner integrity.           | 17        |
|  | SITE NAME   | Gin and Tectonic Federal 5 O South CTB Release | 7/25/2024 |



|  |             |  |           |
|--|-------------|--|-----------|
| TETRA TECH, INC.<br>PROJECT NO.<br>212C-MD-03561 | DESCRIPTION | View south. View of liner integrity and muscle wall. No staining observed outside of the lined facility. | 18        |
|  | SITE NAME   | Gin and Tectonic Federal 5 O South CTB Release   | 7/25/2024 |



**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

QUESTIONS

Action 371845

QUESTIONS

|   |                |   |
|---|----------------|---|
| Operator:<br>COG OPERATING LLC<br>600 W Illinois Ave<br>Midland, TX 79701 | OGRID:         | 229137  |
|   | Action Number: | 371845  |
|   | Action Type:   | [C-141] Remediation Closure Request C-141 (C-141-v-Closure) |
|   |                |   |

QUESTIONS

|                   |   |
|-------------------|---|
| Prerequisites     |   |
| Incident ID (n#)  | nAPP2419036870  |
| Incident Name     | NAPP2419036870 GIN AND TECTONIC FEDERAL 5 O SOUTH CTB @ 0 |
| Incident Type     | Produced Water Release                                    |
| Incident Status   | Remediation Closure Report Received                       |
| Incident Facility | [fAPP2417647408] GIN AND TECTONIC FED 5 O SOUTH CTB       |

|  |  |
|--|--|
| Location of Release Source                     |  |
| Please answer all the questions in this group. |  |
| Site Name                                      | Gin and Tectonic Federal 5 O South CTB |
| Date Release Discovered                        | 07/04/2024                             |
| Surface Owner                                  | Federal                                |

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

|  |  |
|--|--|
| Nature and Volume of Release   |  |
| Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission. |  |
| Crude Oil Released (bbls) Details  | Not answered.  |
| Produced Water Released (bbls) Details   | Cause: Other   Gasket   Produced Water   Released: 60 BBL   Recovered: 60 BBL   Lost: 0 BBL. |
| Is the concentration of chloride in the produced water >10,000 mg/l  | Yes  |
| Condensate Released (bbls) Details   | Not answered.  |
| Natural Gas Vented (Mcf) Details   | Not answered.  |
| Natural Gas Flared (Mcf) Details   | Not answered.  |
| Other Released Details   | Not answered.  |
| Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)                                 | Not answered.  |

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

QUESTIONS, Page 2

Action 371845

QUESTIONS (continued)

|   |   |
|---|---|
| Operator:<br>COG OPERATING LLC<br>600 W Illinois Ave<br>Midland, TX 79701 | OGRID:<br>229137  |
|   | Action Number:<br>371845  |
|   | Action Type:<br>[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  | Yes  |
| Reasons why this would be considered a submission for a notification of a major release   | From paragraph A. "Major release" determine using:<br>(1) an unauthorized release of a volume, excluding gases, of 25 barrels or more. |
| 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   | The release was initially communicated, coinciding with the extended holiday weekend of July 4th.                           |
| 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: Brittany Esparza<br>Title: Environmental Technician<br>Email: brittany.Esparza@ConocoPhillips.com<br>Date: 07/18/2024 |

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

QUESTIONS, Page 3

Action 371845

**QUESTIONS (continued)**

|   |   |
|---|---|
| Operator:<br>COG OPERATING LLC<br>600 W Illinois Ave<br>Midland, TX 79701 | OGRID:  |
|   | 229137  |
|   | Action Number:  |
|   | 371845  |
|   | 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 26 and 50 (ft.)        |
| What method was used to determine the depth to ground water  | NM OSE iWaters Database Search |
| Did this release impact groundwater or surface water   | No                             |
| <b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>   |                                |
| A continuously flowing watercourse or any other significant watercourse  | Greater than 5 (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 1000 (ft.) and ½ (mi.) |
| A subsurface mine  | Greater than 5 (mi.)           |
| An (non-karst) unstable area   | Greater than 5 (mi.)           |
| Categorize the risk of this well / site being in a karst geology   | None                           |
| A 100-year floodplain  | Greater than 5 (mi.)           |
| Did the release impact areas not on an exploration, development, production, or storage site                               | No                             |

**Remediation Plan**

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

|  |            |
|--|------------|
| Requesting a remediation plan approval with this submission  | Yes        |
| Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.  |            |
| Have the lateral and vertical extents of contamination been fully delineated   | Yes        |
| Was this release entirely contained within a lined containment area  | Yes        |
| Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.  |            |
| On what estimated date will the remediation commence   | 07/25/2024 |
| On what date will (or did) the final sampling or liner inspection occur  | 07/25/2024 |
| On what date will (or was) the remediation complete(d)   | 07/25/2024 |
| What is the estimated surface area (in square feet) that will be remediated  | 0          |
| What is the estimated volume (in cubic yards) that will be remediated  | 0          |
| These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.  |            |
| The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required. |            |

**District I**

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**District III**

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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**

QUESTIONS, Page 4

Action 371845

**QUESTIONS (continued)**

|   |   |
|---|---|
| Operator:<br>COG OPERATING LLC<br>600 W Illinois Ave<br>Midland, TX 79701 | OGRID:<br>229137  |
|   | Action Number:<br>371845  |
|   | Action Type:<br>[C-141] Remediation Closure Request C-141 (C-141-v-Closure) |
|   |   |

**QUESTIONS**

|  |   |
|--|---|
| <b>Remediation Plan (continued)</b>  |   |
| <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>   |   |
| <b>This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:</b>   |   |
| <i>(Select all answers below that apply.)</i>  |   |
| Is (or was) there affected material present needing to be removed  | No  |
| Is (or was) there a power wash of the lined containment area (to be) performed   | Yes   |
| OTHER (Non-listed remedial process)  | No  |
| <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: Brittany Esparza<br>Title: Environmental Technician<br>Email: brittany.Esparza@ConocoPhillips.com<br>Date: 08/08/2024 |
| <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>  |   |



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Action 371845

**QUESTIONS (continued)**

|   |                |
|---|----------------|
| Operator:<br>COG OPERATING LLC<br>600 W Illinois Ave<br>Midland, TX 79701 | OGRID:         |
|   | 229137         |
|   | Action Number: |
|   | 371845         |
| Action Type:  |                |
| [C-141] Remediation Closure Request C-141 (C-141-v-Closure)               |                |

**QUESTIONS**

| Liner Inspection Information  |            |
|---|------------|
| Last liner inspection notification (C-141L) recorded  | 366226     |
| Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC | 07/25/2024 |
| Was all the impacted materials removed from the liner   | Yes        |
| What was the liner inspection surface area in square feet   | 8300       |

**Remediation Closure Request**

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

|   |      |
|---|------|
| Requesting a remediation closure approval with this submission                  | Yes  |
| Have the lateral and vertical extents of contamination been fully delineated    | Yes  |
| Was this release entirely contained within a lined containment area             | Yes  |
| What was the total surface area (in square feet) remediated                     | 9165 |
| What was the total volume (cubic yards) remediated                              | 0    |
| 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: Brittany Esparza<br>Title: Environmental Technician<br>Email: brittany.Esparza@ConocoPhillips.com<br>Date: 08/08/2024 |
|--|---|

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CONDITIONS  
  
Action 371845

CONDITIONS

|   |                |
|---|----------------|
| Operator:<br>COG OPERATING LLC<br>600 W Illinois Ave<br>Midland, TX 79701 | OGRID:         |
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| [C-141] Remediation Closure Request C-141 (C-141-v-Closure)               |                |

CONDITIONS

|            |   |                |
|------------|---|----------------|
| Created By | Condition   | Condition Date |
| rhamlet    | We have received your Remediation Closure Report for Incident #NAPP2419036870 GIN AND TECTONIC FEDERAL 5 O SOUTH CTB, thank you. This Remediation Closure Report is approved. | 8/29/2024      |