



November 7, 2024

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

**Re: Liner Inspection and Closure Request
ConocoPhillips
Gunner 8 Federal 8H Tank Battery Release
Unit Letter M, Section 08, Township 26 South, Range 34 East
Lea County, New Mexico
Incident ID# NAPP2427529587**

Sir or Madam:

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips Company to assess a release associated with the Gunner 8 Federal 8H Tank Battery facility (fAPP2203943927). The release footprint is located within Public Land Survey System (PLSS) Unit Letter M, Section 08, Township 26 South, Range 34 East, in Lea County, New Mexico (Site). The approximate release point occurred at coordinates 32.05366389°, -103.49985833°, as shown on Figures 1 and 2.

BACKGROUND

ConocoPhillips submitted a Notification of Release (NOR) to the NMOCD on October 1, 2024. According to information provided by ConocoPhillips, the MSO discovered a leak coming from the transfer pump back pressure valve while inspecting the facility on September 28, 2024. All produced water was reportedly captured in the secondary containment. According to ConocoPhillips personnel, this is a gravel lined facility. Approximately 38.47 bbls of produced water were released, with 35 bbls recovered by a vacuum truck.

The initial C-141 was submitted to OCD Permitting on October 10, 2024, and approved by the OCD on October 15, 2024. The release was assigned the Incident ID # NAPP2427529587.

LAND OWNERSHIP

According to the NMOCD Oil and Gas Map, the Site is located on federal lands managed by the Bureau of Land Management (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:

Shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (feet bgs)	> 105 feet bgs
Method used to determine the depth to ground water	Direct Measurement
Did this release impact groundwater or surface water?	No

Tetra Tech

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

Tel 432.682.4559 Fax 432.682.3946 www.tetrattech.com

Liner Inspection and Closure Report
November 7, 2024

ConocoPhillips

<u>The minimum distance between the closest lateral extents of the release and the following surface areas:</u>	
A continuously flowing watercourse or any other significant watercourse	Between 1 and 5 miles
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	> 5 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	370 feet
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 an 800-meter (approximately 1/2-mile) radius of the Site. A groundwater determination boring was drilled to 105 feet below ground surface (bgs) on the lease pad in May 2024 to complete the site characterization for the nearby Gunner 8 Federal #008H release (Incident ID NAPP2400930878). No water was present in the well during or after drilling. The site characterization data, including the boring log and temporary well diagram, are 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 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	20,000 mg/kg
TPH (GRO+DRO+ORO)	2,500 mg/kg
TPH (GRO+DRO)	1,000 mg/kg
BTEX	50 mg/kg
Benzene	10 mg/kg

Liner Inspection and Closure Report
November 7, 2024

ConocoPhillips

LINER INTEGRITY

In accordance with 19.15.29.11(A)(5)(a) NMAC, notification (C-141L) of a liner inspection at the Gunner 8 Federal 8H Tank Battery was submitted via the NMOCD portal on October 15, 2024. The liner inspection notification email is included in Appendix C.

Prior to conducting the liner inspection, ConocoPhillips representatives removed the impacted gravel and pressure washed the liner. Photographic documentation following the pressure washing activities are included in Appendix D. On October 18, 2024, Tetra Tech personnel performed an inspection of the liner within the containment area of the Gunner 8 Federal 8H 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 had the ability to contain the documented release. Photographic documentation of the liner inspection is included in Appendix D.

This portion of Lea County experienced rainfall the night before the liner inspection on October 18th, after the initial cleaning. Photographs of the liner during the inspection indicate areas of standing rainwater from these weather events. 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, ConocoPhillips 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) 739-7874.

Sincerely,

Tetra Tech, Inc.



Samantha Abbott, P.G.
Project Manager



Lisbeth Chavira
Staff Geoscientist

cc:

Mr. Jacob Laird, PBU - ConocoPhillips

Liner Inspection and Closure Report
November 7, 2024

ConocoPhillips

LIST OF ATTACHMENTS

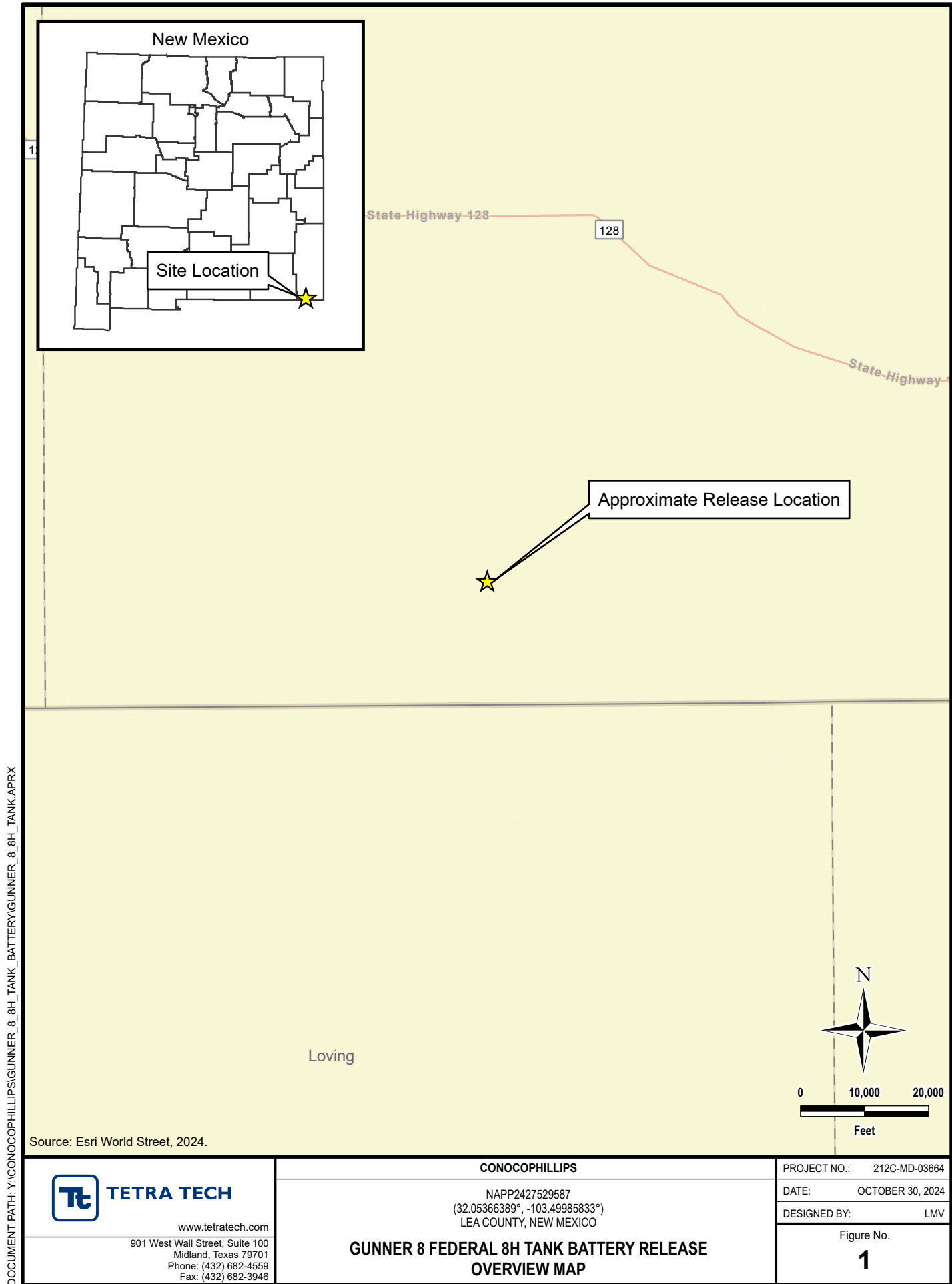
Figures:

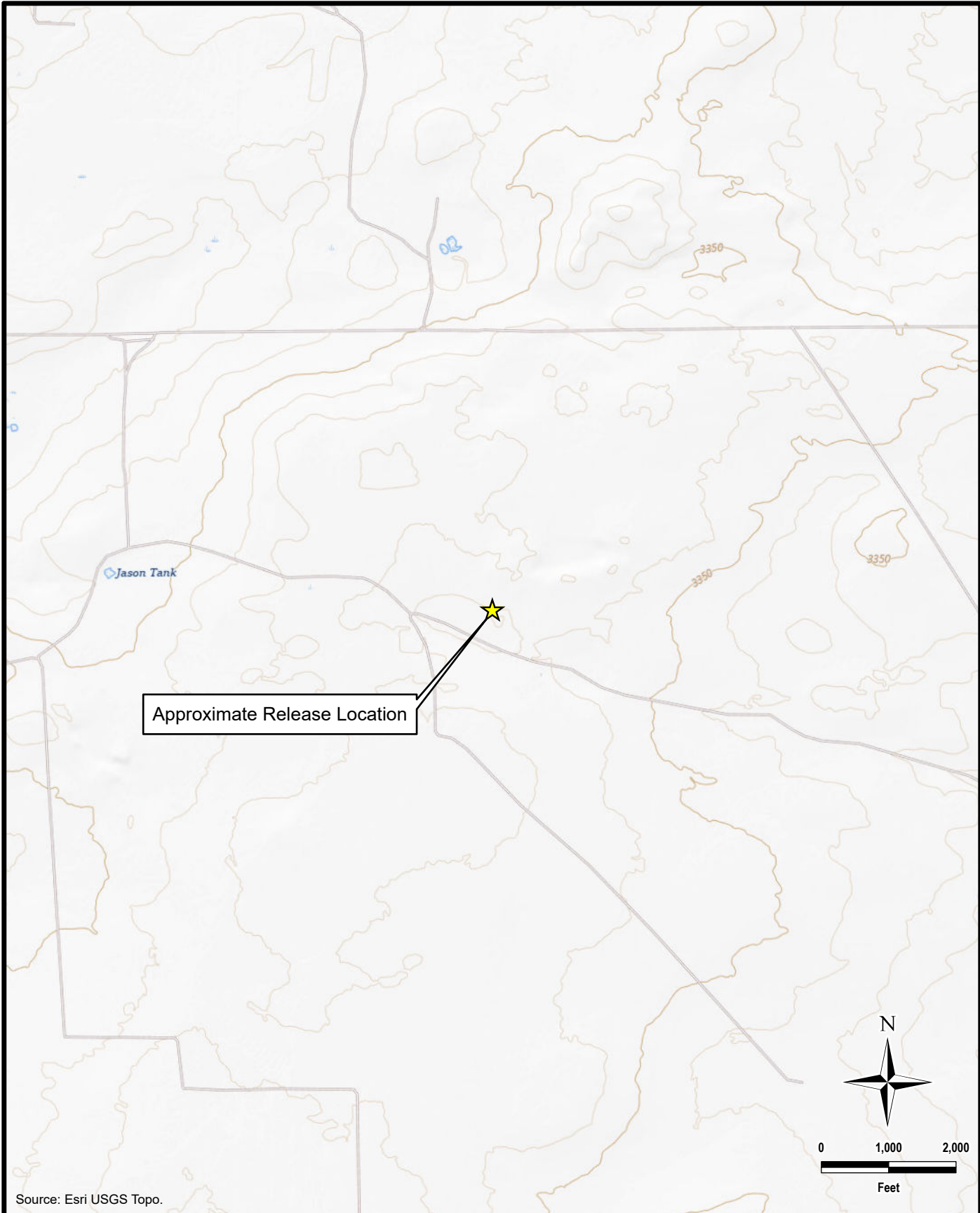
- Figure 1 – Overview Map
- Figure 2 – Topographic Map
- Figure 3 – Approximate Release Extent and Liner Inspection

Appendices:

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

FIGURES





Source: Esri USGS Topo.



TETRA TECH

www.tetrattech.com

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Midland, Texas 79701
Phone: (432) 682-4559
Fax: (432) 682-3946

CONOCOPHILLIPS

NAPP2427529587
(32.05366389°, -103.49985833°)
LEA COUNTY, NEW MEXICO

**GUNNER 8 FEDERAL 8H TANK BATTERY RELEASE
TOPOGRAPHIC MAP**

PROJECT NO.: 212C-MD-0XXX

DATE: OCTOBER 30, 2024

DESIGNED BY: LMV


Figure No.

2

DOCUMENT PATH: Y:\CONOCOPHILLIPS\GUNNER_8_8H_TANK_BATTERY\GUNNER_8_8H_TANK.APRX



DOCUMENT PATH: Y:\CONOCOPHILLIPS\GUNNER_8_8H_TANK_BATTERY\GUNNER_8_8H_TANK.APRX

<div>TETRA TECH</div> <div>www.tetrattech.com</div> <div>901 West Wall Street, Suite 100 Midland, Texas 79701 Phone: (432) 682-4559 Fax: (432) 682-3946</div>	CONOCOPHILLIPS		PROJECT NO.: 212C-MD-03664
	NAPP2427529587 (32.05366389°, -103.49985833°) LEA COUNTY, NEW MEXICO		DATE: OCTOBER 30, 2024
	GUNNER 8 FEDERAL 8H TANK BATTERY RELEASE APPROXIMATE RELEASE EXTENT AND LINER INSPECTION AREA		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 391768

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 391768
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2427529587
Incident Name	NAPP2427529587 GUNNER 8 FED 8H @ 0
Incident Type	Produced Water Release
Incident Status	Initial C-141 Received
Incident Facility	[fAPP2203943927] Gunner 8 Fed 8H - RT Btty

Location of Release Source	
Please answer all the questions in this group.	
Site Name	Gunner 8 Fed 8H
Date Release Discovered	09/28/2024
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: Normal Operations Pump Produced Water Released: 38 BBL Recovered: 35 BBL Lost: 3 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.

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QUESTIONS, Page 2

Action 391768

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 391768
	Action Type: [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: (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	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: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 10/10/2024
--	---

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QUESTIONS, Page 3

Action 391768

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 391768
	Action Type: [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.	

Received by OCD: 11/19/2024 10:50:43 AM

Facility Name & Well Number(s): Gunner 8 Fed 8H Battery

Provide any known details about the event:

Back Pressure Valve drain plug threads were corroded and plug blew out when pump started up.

Primary Cause (dropdown):

Internal Corrosion - Erosion

Rain >1/2" in the past 24 hrs:

No

Secondary Containment Lined or Unlined:

Recovered Volume (bbl.) (if available, not included in volume calculations)

Release Type (dropdown):

Method of Determination (dropdown):

BU:

Permian

Asset Area:

DBE - Asset Avg.

Lined

35

Produced Water

Field Measurement

Known Volume (dropdown):

No

Known Area (dropdown):

No

Spill Calculation - On-Pad Surface Pool Spill

Convert Irregular shape into a series of rectangles	Length (ft.)	Width (ft.)	Average Depth (in.)	Estimated Pool Area (sq. ft.)	Estimated volume of each pool area (bbl.)	Total Estimated Volume of Spill (bbl.)
Rectangle A	24	24	4.0	576.00	13.67	13.67
Rectangle B	20	20	4.0	400.00	9.49	9.49
Rectangle C	40	7	3.0	280.00	4.98	4.98
Rectangle D	20	15	3.0	300.00	5.34	5.34
Rectangle E	40	7	3.0	280.00	4.98	4.98
Rectangle F				0.00	0.00	0.00
Rectangle G				0.00	0.00	0.00
Rectangle H				0.00	0.00	0.00
Rectangle I				0.00	0.00	0.00
Rectangle J				0.00	0.00	0.00

Released to Imaging: 11/20/2024 9:24:00 AM

Total Volume Released to Lined Secondary Containment:

38.4717

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CONDITIONS

Action 391768

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 391768
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

CONDITIONS

Created By	Condition	Condition Date
rhamlet	None	10/15/2024

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 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: 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.

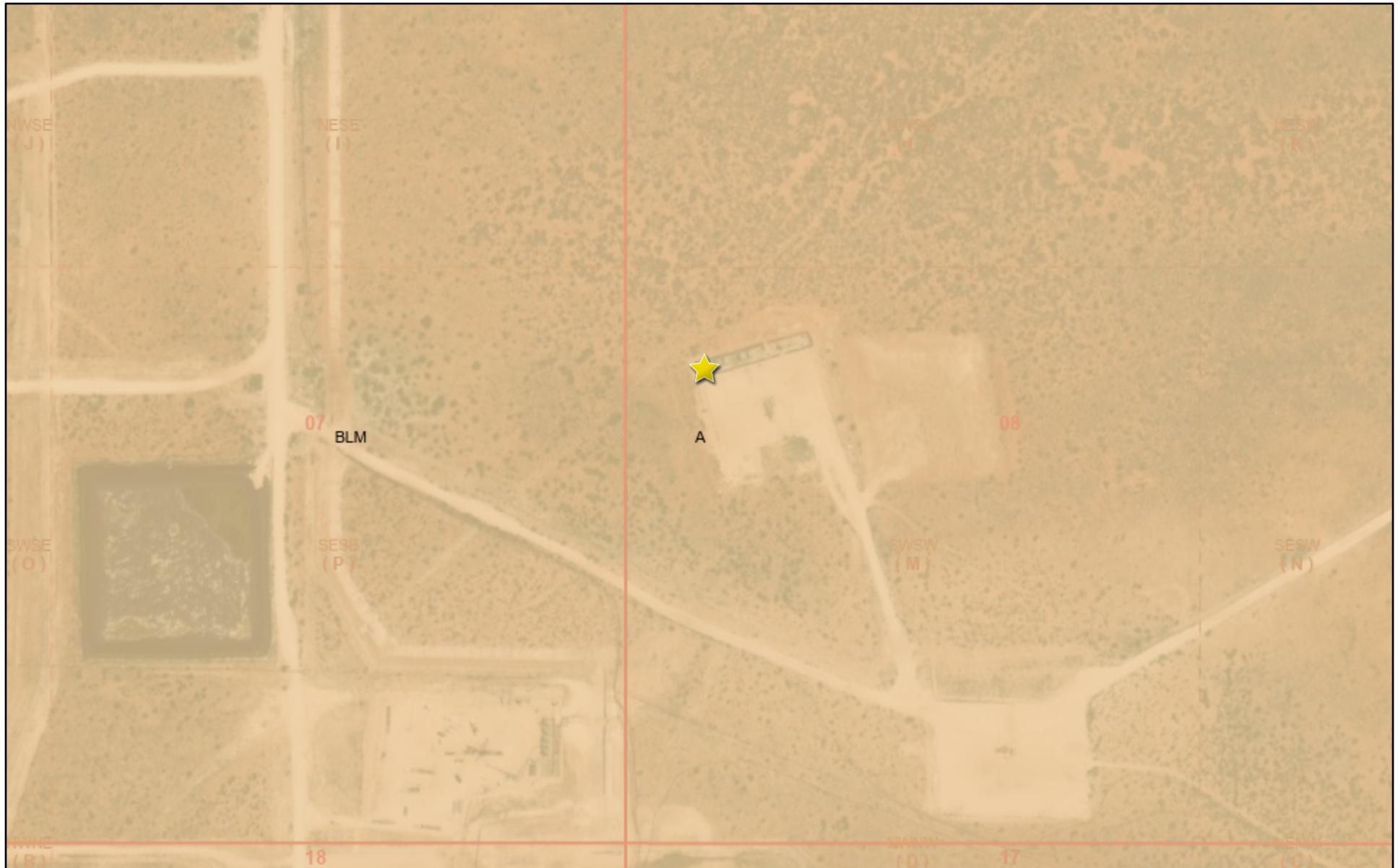
Closure Approved by: _____ Date: _____

Printed Name: _____ Title: _____

APPENDIX B

Site Characterization Data

Land Ownership



10/29/2024, 2:47:31 PM

★ Override 1

Mineral Ownership

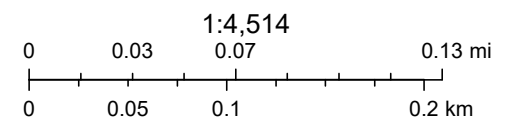
■ A-All minerals are owned by U.S.

Land Ownership

■ BLM

■ PLSS Second Division

■ PLSS First Division



U.S. BLM, OCD, Maxar, BLM

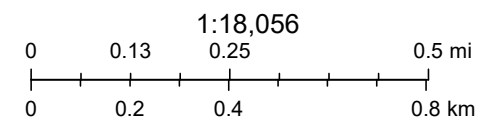
Water Bodies



10/29/2024, 3:07:07 PM



Override 1



OCD, Maxar, NM OSE



U.S. Fish and Wildlife Service

National Wetlands Inventory

Wetlands



October 29, 2024

Wetlands

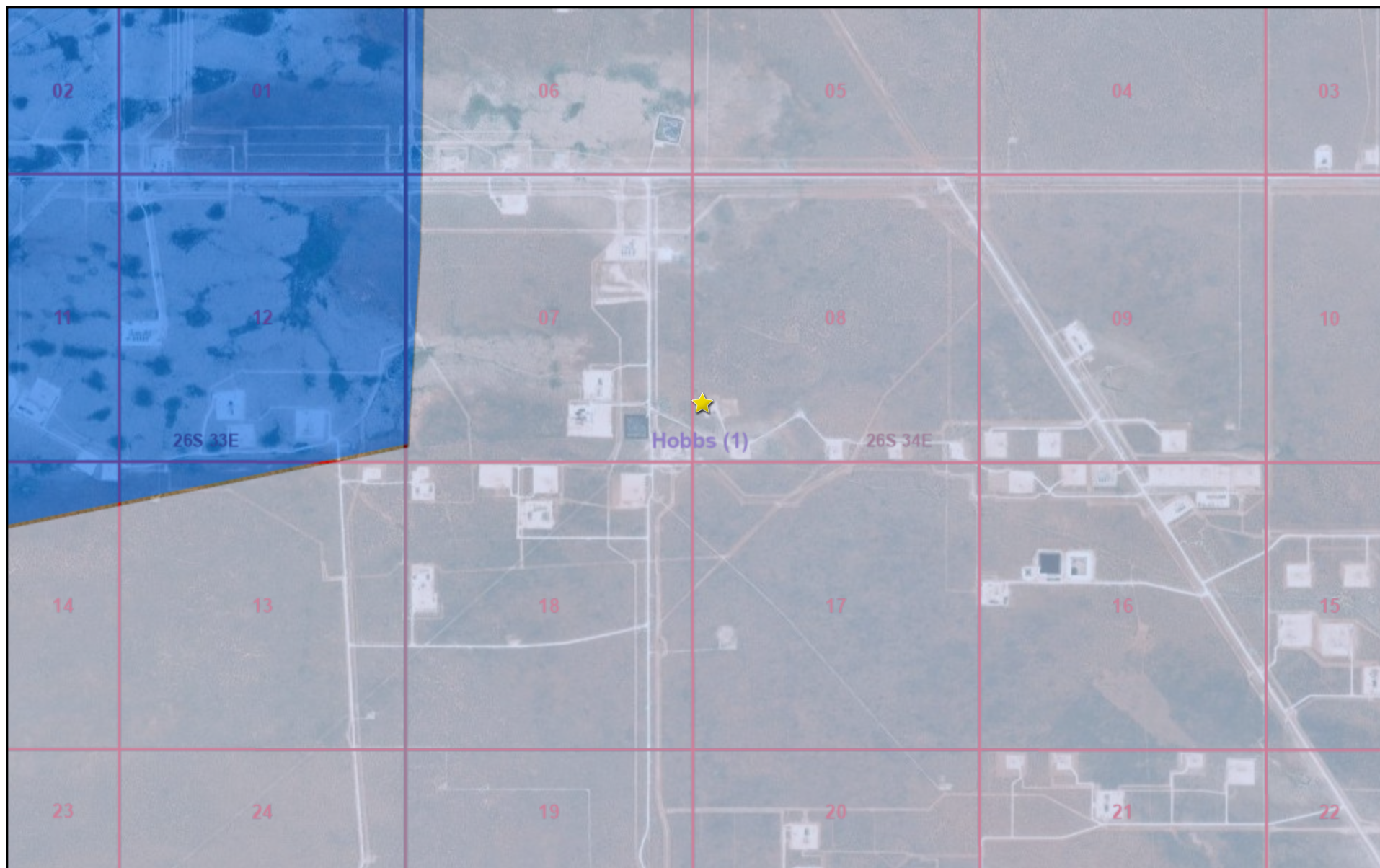
- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

- 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.

Karst Potential



11/5/2024, 10:13:34 AM



Override 1



Low



PLSS First Division

Karst Occurrence Potential



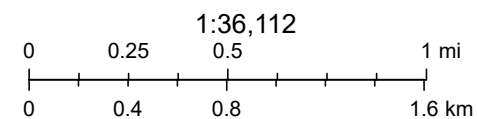
OCD Districts



PLSS Townships



Medium



BLM, OCD, New Mexico Tech, OCD, Maxar, BLM

New Mexico Oil Conservation Division

NM OCD Oil and Gas Map. <http://nm-ernrd.maps.arcgis.com/apps/webappviewer/index.html?id=4d017f2306164de29fd2fb9f8f35ca75>: New Mexico Oil Conservation Division

Induced Seismicity



10/29/2024, 3:36:14 PM



Override 1

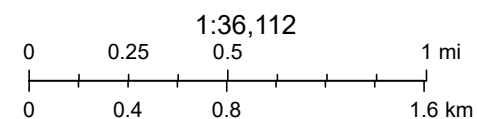


10 mi.

Seismic Response 3.0 to 3.4



OCD Districts



Oil Conservation Division (OCD), Energy, Minerals and Natural Resources Department (EMNRD), OCD, Maxar

New Mexico Oil Conservation Division

National Flood Hazard Layer FIRMette



103°30'18"W 32°3'28"N



Legend

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

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) 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
		Hydrographic Feature
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 10/29/2024 at 8:41 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.

212C-MD-03343	TETRA TECH	LOG OF BORING Gunner 8 Federal #008H DTW	Page 1 of 1
Project Name: Gunner 8 Fed #008H			
Borehole Location: GPS Coordinates: 32.053208°, -103.499466°		Surface Elevation: 3360'	
Borehole Number: Gunner 8 Federal #008H DTW		Borehole Diameter (in.): 8"	Date Started: _____ Date Finished: 5/16/2024

DEPTH (ft)	OPERATION TYPES	SAMPLE	CHLORIDE CONCENTRATION (ppm)	VOC CONCENTRATION (ppm)	SAMPLE RECOVERY (%)	MOISTURE CONTENT (%)	DRY DENSITY (pcf)	LIQUID LIMIT	PLASTICITY INDEX	MINUS NO. 200 (%)	GRAPHIC LOG	WATER LEVEL OBSERVATIONS		DEPTH (ft)	WELL DIAGRAM
												While Drilling	24 Hours After Completion of Drilling		
												While Drilling <input checked="" type="checkbox"/> DRY 24 Hours After Completion of Drilling <input checked="" type="checkbox"/> DRY			
												Remarks:			
												MATERIAL DESCRIPTION			
5												-SP- SAND: Light brown, loose, dry, fine- to coarse-grained, with caliche fragments	2		
10												-SM- SILTY SAND: Brown to dark brown, partially weakly cemented, dry, fine-grained, with large caliche fragments	6		
15												-SP- SAND: Brown, partially weakly cemented, dry, fine- to coarse-grained, with caliche fragments	14		
20												-SP- SAND: Brown, moderately cemented, dry, fine-grained, with clayey sand and caliche fragments	19		
25												-SP- SAND: Light brown to pale brown, partially weakly cemented, fine-grained, with clayey sand and caliche nodules	24		
30												-GM- SAND: Pale brown, loose to partially weakly cemented, dry, very fine- to fine-grained, with caliche fragments	29		
35												-SP- SAND: Pale brown, dry, coarse-grained, with caliche fragments	39		
40												-SC- CLAYEY SAND: Brown, moderately cemented, dry, fine-grained, trace caliche nodules	49		
45												-SC- CLAYEY SAND: Reddish brown, partially weakly, dry, very fine- to fine-grained	59		
50												-SM- SAND: Light brown, loose, dry, very fine-grained, with some indurated clayey sand fragments	69		
55												-SM- SAND: Light brown, loose to partially weakly cemented, dry, very fine- to fine-grained, with some indurated clayey sand fragments	79		
60												-SM- SAND: Brown to reddish brown, loose to partially weakly cemented, dry, very fine- to fine-grained, with indurated clayey sand fragments	89		
65												-- SANDY CLAYSTONE: Light brown to reddish brown, indurated, dry, fine-grained			
70												-- SILTSTONE: Light reddish brown, weakly cemented, dry, fine-grained			
75															
80															
85															
90															
95															
100															
105															

Bottom of borehole at 105.0 feet.

Sampler Types: <div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;"> Split Spoon Shelby Bulk Sample Grab Sample </div> <div style="width: 50%;"> Acetate Liner Vane Shear California Test Pit </div> </div>	Operation Types: <div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;"> Auger Hollow Stem Auger Continuous Flight Auger Mud Rotary </div> <div style="width: 50%;"> Air Rotary Direct Push Drive Casing </div> </div>	Notes: Surface elevation is an approximate value obtained from Google Earth data.
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Logger: Colton Bickerstaff	Drilling Equipment: Air Rotary	Driller: Scarborough Drilling
----------------------------	--------------------------------	-------------------------------

APPENDIX C

Regulatory Correspondence

From: [Lull, Christian](#)
To: [Abbott, Sam](#); [Chavira, Lisbeth](#); [Allen, Samantha](#)
Subject: Fwd: [EXTERNAL]The Oil Conservation Division (OCD) has accepted the application, Application ID: 392721
Date: Tuesday, October 15, 2024 12:00:00 PM

Christian

Get [Outlook](#) for iOS

From: Laird, Jacob <Jacob.Laird@conocophillips.com>
Sent: Tuesday, October 15, 2024 11:55:42 AM
To: Lull, Christian <christian.lull@tetrattech.com>
Subject: FW: [EXTERNAL]The Oil Conservation Division (OCD) has accepted the application, Application ID: 392721

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

FYI for the Gunner

I appreciate you,

Jacob Laird | Environmental Engineer, DBE | **ConocoPhillips**
C: 575-703-5482

From: OCDOnline@state.nm.us <OCDOnline@state.nm.us>
Sent: Tuesday, October 15, 2024 10:54 AM
To: Laird, Jacob <Jacob.Laird@conocophillips.com>
Subject: [EXTERNAL]The Oil Conservation Division (OCD) has accepted the application, Application ID: 392721

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

To whom it may concern (c/o Jacob Laird for COG OPERATING LLC),

The OCD has received the submitted *Notification for Liner Inspection for a Release* (C-141L), for incident ID (n#) nAPP2427529587.

The liner inspection is expected to take place:

When: 10/18/2024 @ 09:00

Where: M-08-26S-34E 0 FNL 0 FEL (32.05366389,-103.4998583)

Additional Information: Rob Davis 432-813-4375

Additional Instructions: Gunner 8 Federal 8H 32.05366389, -103.49985833

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.

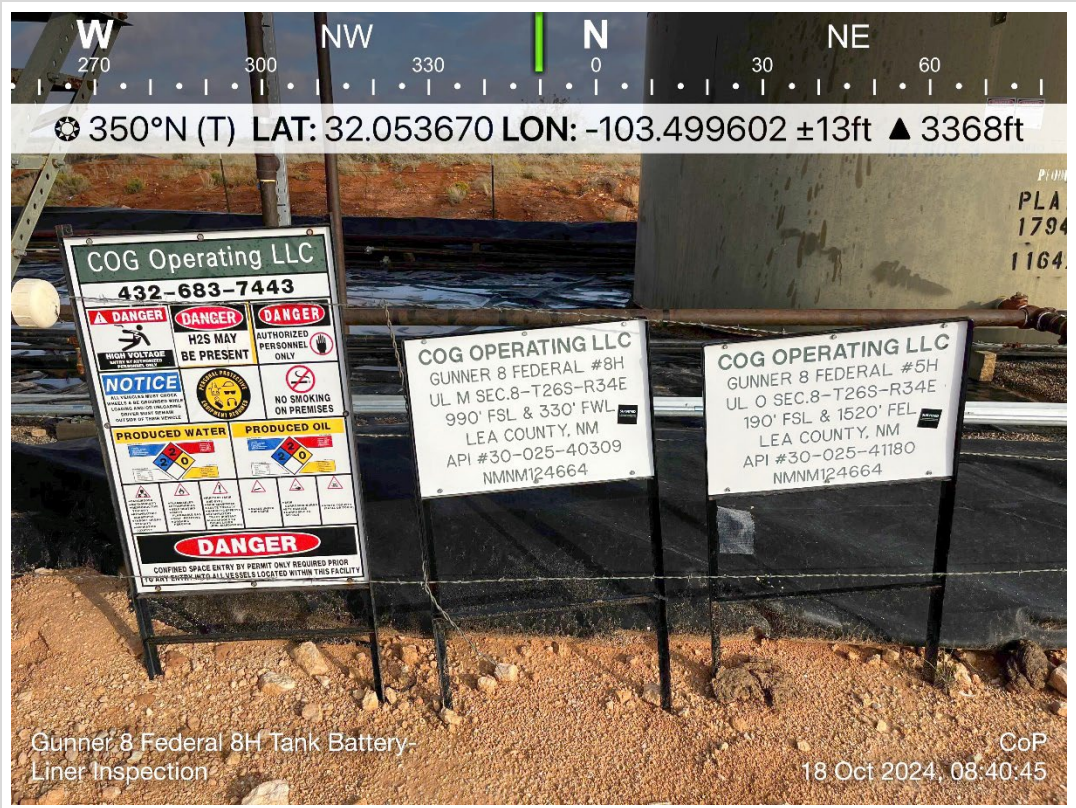
- **Failure to notify the OCD of liner inspections including any changes in date/time per the requirements of 19.15.29.11.A(5)(a)(ii) NMAC, may result in the inspection not being accepted.**

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

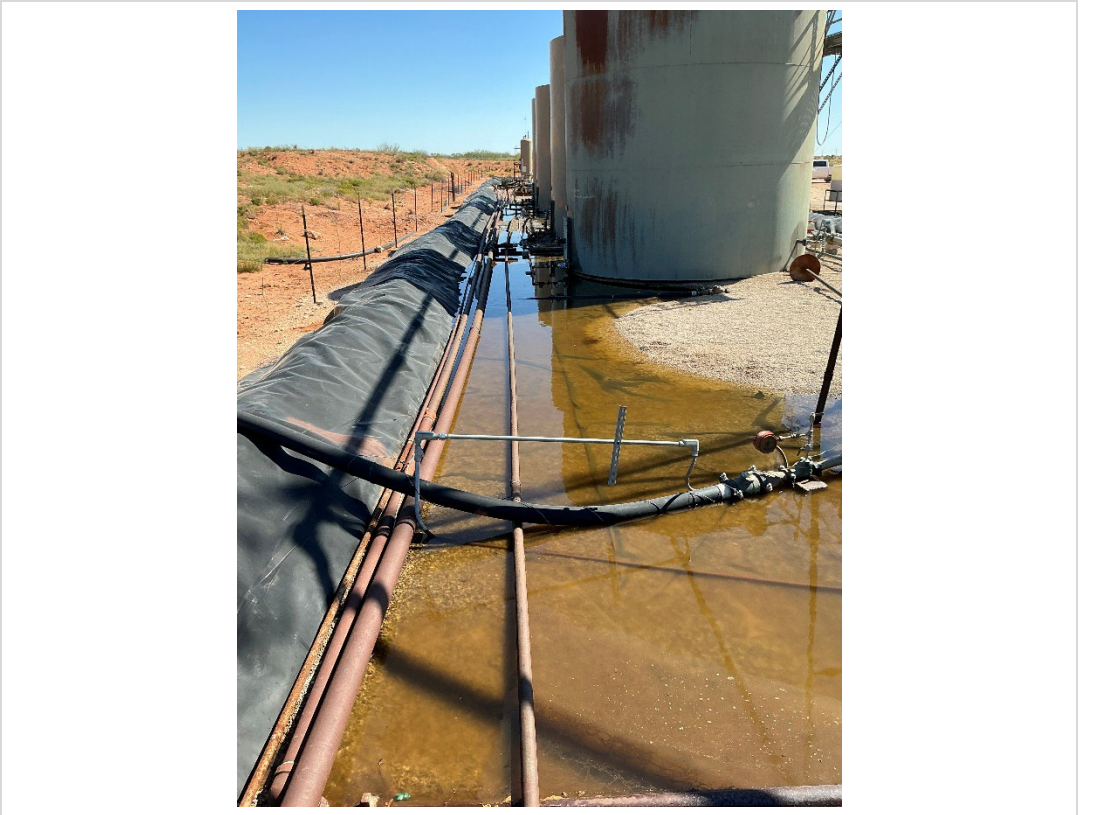
Photographic Documentation



TETRA TECH, INC. PROJECT NO. 212C-MD-03664	DESCRIPTION	Site signage.	1
	SITE NAME	Gunner 8 Federal 8H Tank Battery Release	10/18/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03664	DESCRIPTION	View north of release in tank battery containment.	2
	SITE NAME	Gunner 8 Federal 8H Tank Battery Release	9/28/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03664	DESCRIPTION	View east of release in tank battery containment.	3
	SITE NAME	Gunner 8 Federal 8H Tank Battery Release	9/28/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03664	DESCRIPTION	View east of liner inspection area in tank battery containment. Rainwater visible on liner.	4
	SITE NAME	Gunner 8 Federal 8H Tank Battery Release	10/18/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03664	DESCRIPTION	View northwest of liner inspection area in tank battery containment.	5
	SITE NAME	Gunner 8 Federal 8H Tank Battery Release	10/18/2024



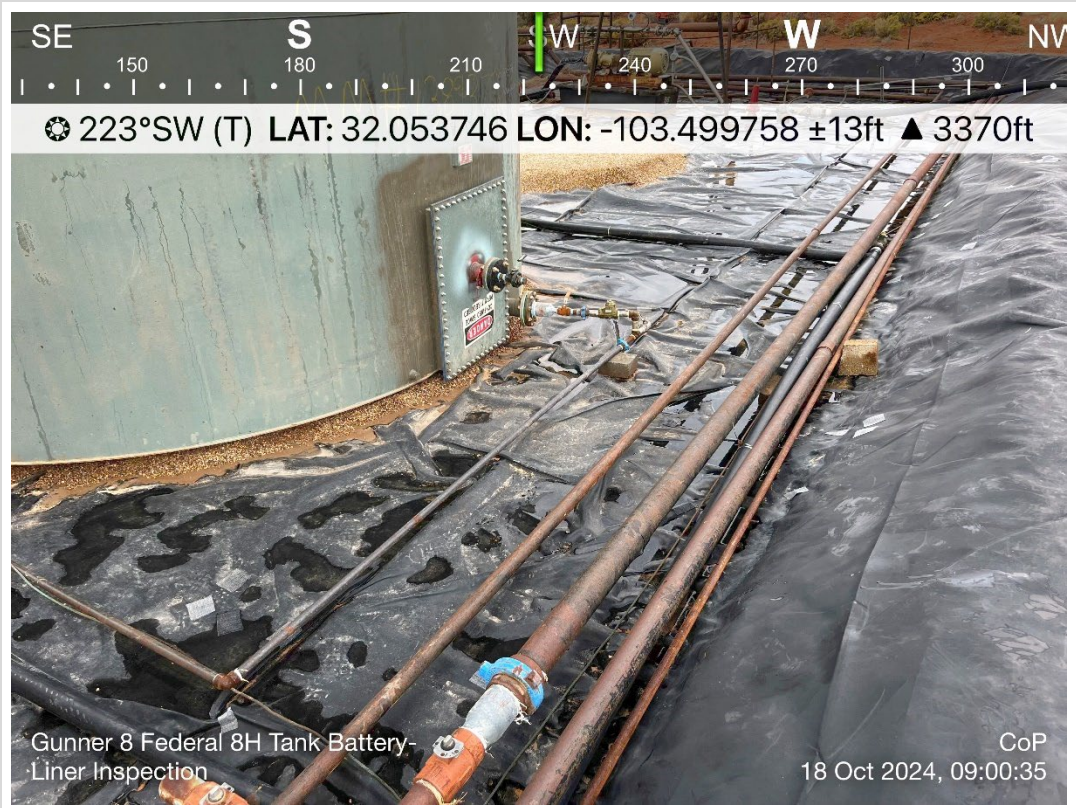
TETRA TECH, INC. PROJECT NO. 212C-MD-03664	DESCRIPTION	View southwest of liner inspection area in tank battery containment.	6
	SITE NAME	Gunner 8 Federal 8H Tank Battery Release	10/18/2024



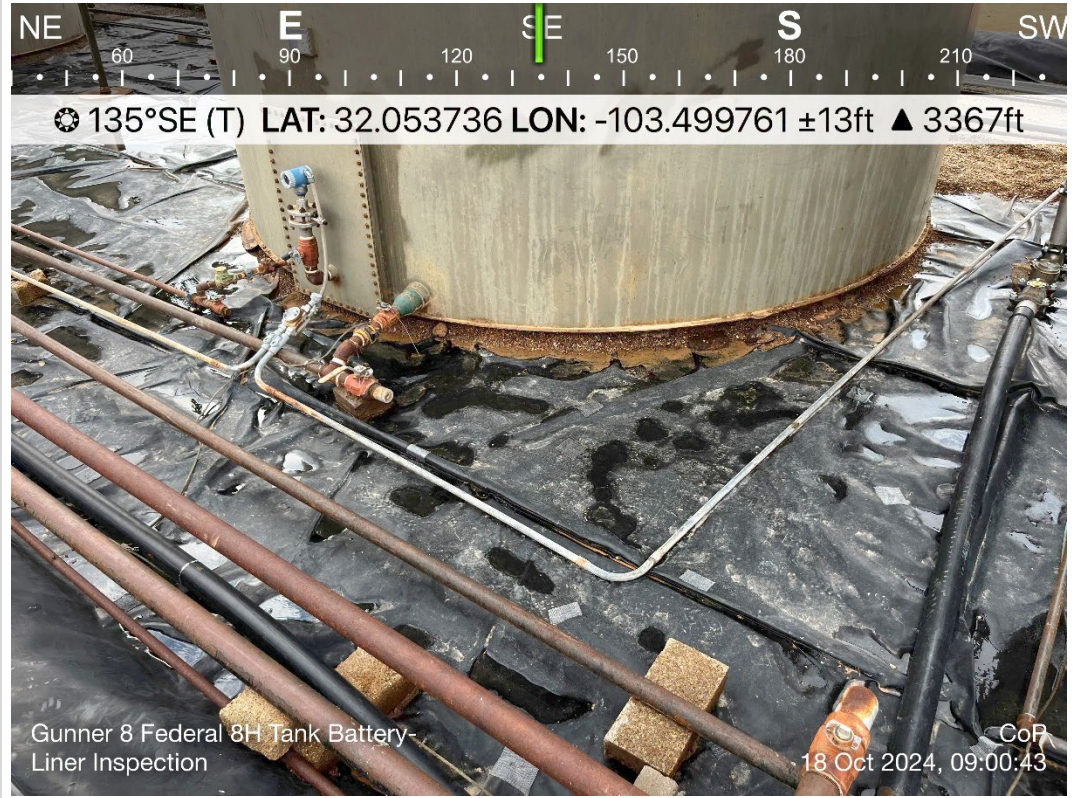
TETRA TECH, INC. PROJECT NO. 212C-MD-03664	DESCRIPTION	View southwest of liner inspection area in tank battery containment.	7
	SITE NAME	Gunner 8 Federal 8H Tank Battery Release	10/18/2024



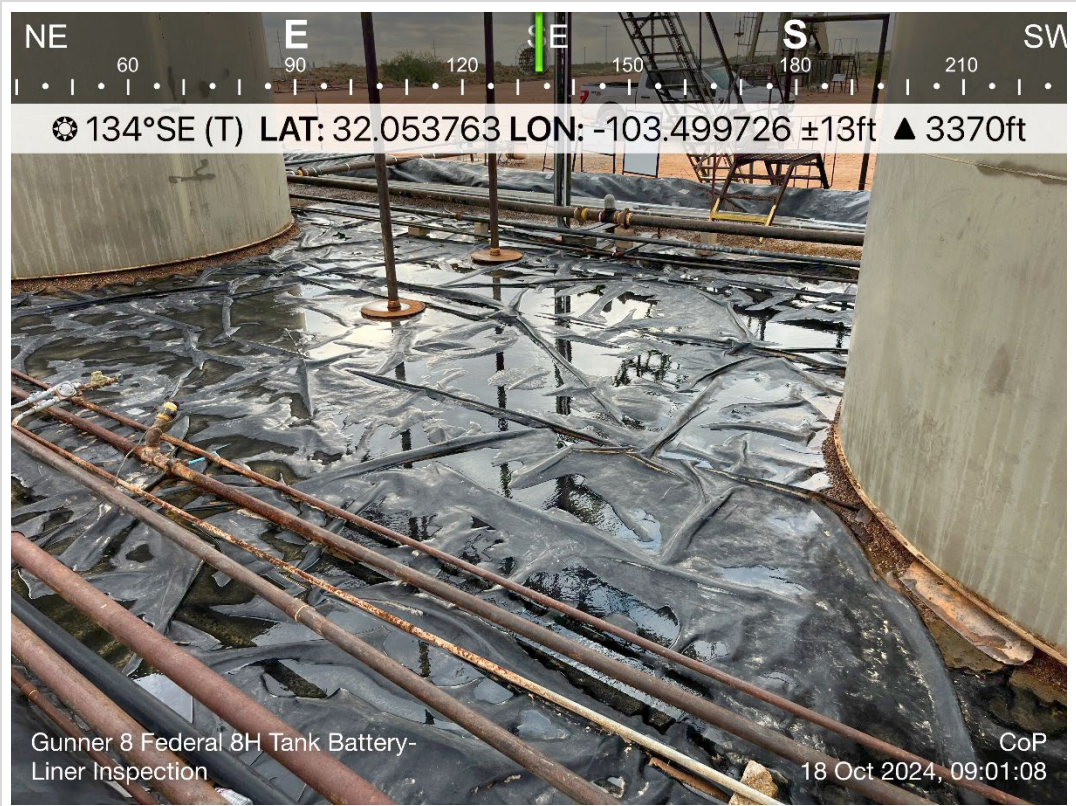
TETRA TECH, INC. PROJECT NO. 212C-MD-03664	DESCRIPTION	View east of liner inspection area in tank battery containment.	8
	SITE NAME	Gunner 8 Federal 8H Tank Battery Release	10/18/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03664	DESCRIPTION	View southwest of liner inspection area in tank battery containment.	9
	SITE NAME	Gunner 8 Federal 8H Tank Battery Release	10/18/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03664	DESCRIPTION	View southeast of liner inspection area in tank battery containment.	10
	SITE NAME	Gunner 8 Federal 8H Tank Battery Release	10/18/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03664	DESCRIPTION	View southeast of liner inspection area in tank battery containment.	11
	SITE NAME	Gunner 8 Federal 8H Tank Battery Release	10/18/2024



TETRA TECH, INC. PROJECT NO. 212C-MD-03664	DESCRIPTION	View east-northeast of facility berm north of containment.	12
	SITE NAME	Gunner 8 Federal 8H Tank Battery Release	10/18/2024

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

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS

Action 404737

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 404737
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2427529587
Incident Name	NAPP2427529587 GUNNER 8 FED 8H @ 0
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Facility	[fAPP2203943927] Gunner 8 Fed 8H - RT Btty

Location of Release Source	
Please answer all the questions in this group.	
Site Name	Gunner 8 Fed 8H
Date Release Discovered	09/28/2024
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: Normal Operations Pump Produced Water Released: 38 BBL Recovered: 35 BBL Lost: 3 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.

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QUESTIONS, Page 2

Action 404737

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 404737
	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	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (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	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: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 10/10/2024
--	---

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QUESTIONS, Page 3

Action 404737

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 404737
	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 100 and 500 (ft.)
What method was used to determine the depth to ground water	Direct Measurement
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Between 1 and 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Greater than 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	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 300 and 500 (ft.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Greater than 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan

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

Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
<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>	
On what estimated date will the remediation commence	10/18/2024
On what date will (or did) the final sampling or liner inspection occur	10/18/2024
On what date will (or was) the remediation complete(d)	10/18/2024
What is the estimated surface area (in square feet) that will be remediated	450
What is the estimated volume (in cubic yards) that will be remediated	8
<i>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.</i>	
<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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QUESTIONS, Page 4

Action 404737

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 404737
	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>	
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 Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 11/19/2024
<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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QUESTIONS, Page 6

Action 404737

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 404737
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	392721
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	10/18/2024
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	5000

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	450
What was the total volume (cubic yards) remediated	8
Summarize any additional remediation activities not included by answers (above)	Impacted gravel was removed (approx. 8 CY), the liner was power washed and inspected for rips or tears, and clean gravel was placed after the inspection.

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 Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 11/19/2024
--	--

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

CONDITIONS

Action 404737

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 404737
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
bhall	Remediation/Liner inspection closure report approved.	11/20/2024
bhall	Please be advised that the digital C-141 form has replaced the word/PDF versions of the Form C-141. The PDF/Word version no longer need to be completed and submitted with any reports submitted via the digital C-141.	11/20/2024