



February 19, 2025

**New Mexico Oil Conservation Division**

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

**Re: Closure Request**  
**Black Pearl 1 Federal 1H**  
**Incident Number nAPP2502138142**  
**Lea County, New Mexico**

To Whom It May Concern:

COG Operating, LLC, (COG), has prepared this *Closure Request* to document the findings of a liner integrity inspection conducted at the Black Pearl 1 Federal 1H (Site) following the release of produced water within a lined containment. Based on the liner integrity inspection activities, COG is submitting this Closure Request, describing assessment activities that have occurred and requesting no further action and closure for Incident Number nAPP2502138142.

**SITE DESCRIPTION AND RELEASE SUMMARY**

The site is located in Unit A, Section 1, Township 20 South, Range 34 East, in Lea County, New Mexico (32.60914167, -103.50798333) and is associated with oil and gas exploration and production operations on federal land managed by the Bureau of Land Management (BLM).

On January 13, 2025, field personnel discovered a pinhole leak on the free water knockout (FWKO) causing a release of approximately seventeen point six two two zero (17.6220) barrels of produced waste being released into a lined containment. A vacuum truck was dispatched to the site to recover free-standing fluids and approximately fifteen (15) barrels of produced water was recovered. The FWKO was isolated and drained to prevent fluid being further released. COG reported the release to the New Mexico Oil Conservation Division (NMOCD) on a *Release Notification Form C-141* (Form C-141) on January 21, 2025. The release was assigned Incident Number nAPP2502138142.

## **SITE CHARACTERIZATION AND CLOSURE CRITERIA**

The site is located within a low karst area. Based on a review of the New Mexico Office of State Engineers and United States Geological Survey (USGS) databases, no known water source within a 0.50-mile radius of the location. The closest well is located approximately 0.84 miles Southeast of the Site in S06, T20S, R35E. On May 3, 1996, the USGS permitted livestock watering well (USGS 323536103301101) was advanced to a depth of 70 feet below ground surface and recorded the depth to water at 56.39 feet below ground surface. Per the NMOCD regulatory criteria established in 19.15.29.12 NMAC, the following criteria were utilized in assessing the site.

- Benzene: 10 milligrams per kilogram (mg/kg).
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX): 50 mg/kg.
- TPH: 100mg/kg (GRO + DRO + MRO).
- Chloride: 600 mg/kg.

## **LINER INTEGRITY INSPECTION ACTIVITIES**

A 48-hour advance notice of the liner inspection was submitted to the NMOCD on February 14, 2025. Prior to conducting the liner integrity inspection, COG operations power washed the liner to remove dirt and debris and recover any residual produced water. A liner integrity inspection was conducted by Jacob Laird on February 19, 2025. Upon inspection, no rips, tears, holes, or damage was observed. The liner was determined to be sufficient, and all released fluids have been removed. Refer to photolog for details.

## **CLOSURE REQUEST**

Based on the liner inspection throughout the facility, the liner was determined to be sufficient. The release was contained laterally by the lined containment and the liner was performing as designed. No further actions are required at the site. COG Operating, LLC respectfully requests that the New Mexico Oil Conservation Division and the Bureau of Land Management grant closure approval for Incident Number nAPP2502138142.

Should you have any questions or concerns please do not hesitate to contact me.

Sincerely,

*Jacob Laird*

Jacob Laird  
Environmental Engineer  
jacob.laird@conocophillips.com

Appendices:

Figures- Site Map Overview, Topography Map, Secondary Containment Map

Appendix A: NMOCD Correspondence

Appendix B: Photolog

Appendix C: Site Characterization and Ground Water

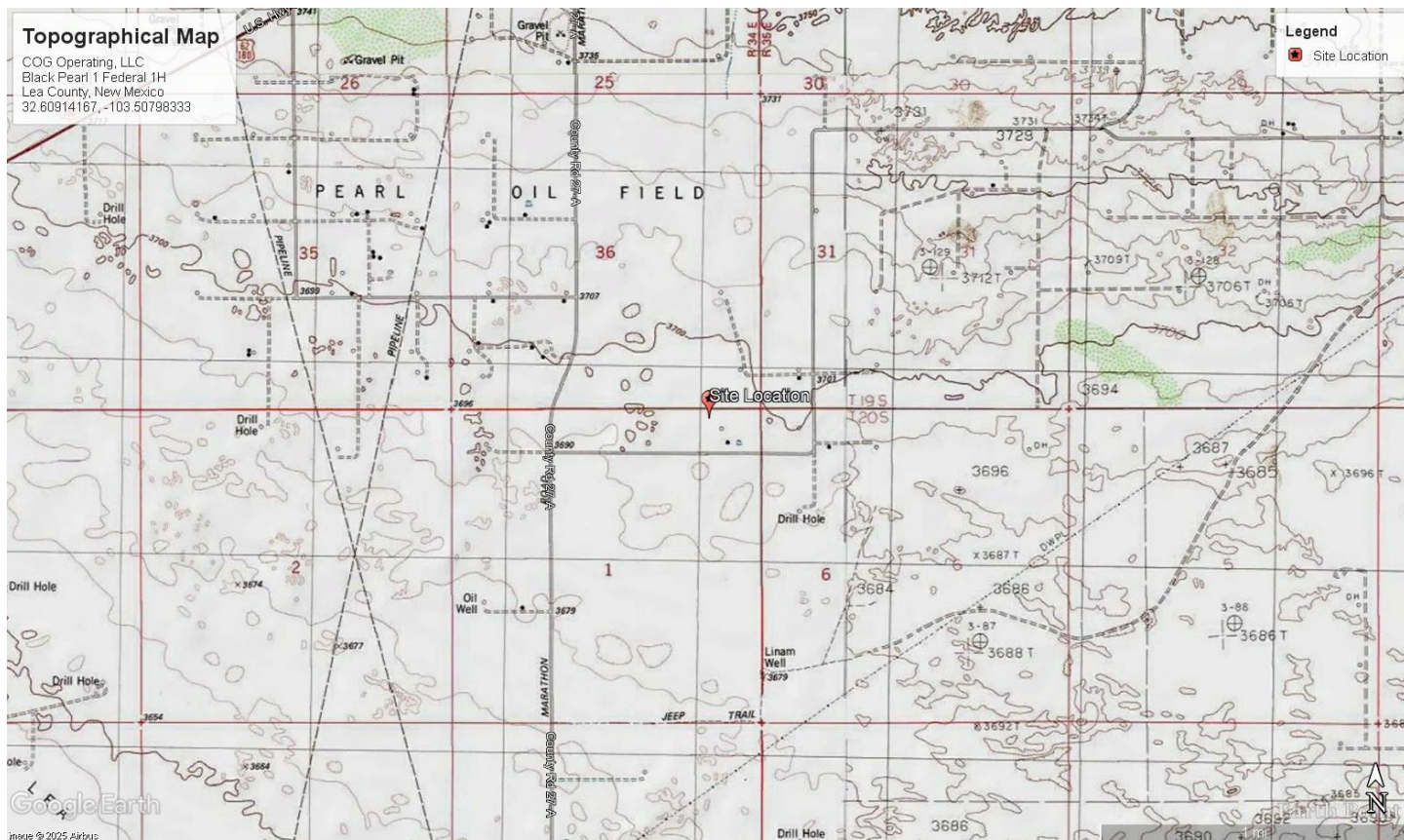
Figures: Site Maps



## Overview Map

COG Operating, LLC  
Black Pearl 1 Federal 1H  
Lea County, New Mexico  
32.60914167, -103.50798333





# Topographical Map

COG Operating, LLC  
Black Pearl 1 Federal 1H  
Lea County, New Mexico  
32.60914167, -103.50798333



## Secondary Containment Map

COG Operating, LLC  
Black Pearl 1 Federal 1H  
Lea County, New Mexico  
32.60914167, -103.50798333

Appendix A: NMOCD Correspondence



<div> <div>Received by OCD: 2/27/2025 10:00:13 AM</div> <div>Facility Name &amp; Well Number(s): Black Pearl 1 Fed #1</div> </div>				Release Discovery Date & Time: 1/13/25 10:30 AM		<div> <div>Page 9 of 29</div> </div>	
<div> <div>Provide any known details about the event:</div> <div>discovered pool at KO and found hole on inlet side</div> </div>				<div> <div>Primary Cause (dropdown):</div> <div>Internal Corrosion - Other</div> </div>	<div> <div>Rain &gt;1/2" in the past 24 hrs:</div> <div>Yes</div> </div>		
				<div> <div>Secondary Containment Lined or Unlined:</div> <div>Lined</div> </div>	<div> <div>Recovered Volume (bbl.) (if available, not included in volume calculations)</div> <div>15</div> </div>	<div> <div>Release Type (dropdown):</div> <div>Produced Water</div> </div>	<div> <div>Method of Determination (dropdown):</div> <div>Field Measurement</div> </div>
<div> <div>BU:</div> <div>Permian</div> </div>	<div> <div>Asset Area:</div> <div>DBE - Asset Avg.</div> </div>						
<div> <div>Known Volume (dropdown):</div> <div>No</div> </div>							
<div> <div>Known Area (dropdown):</div> <div>Yes</div> </div>				<div> <div>Mapped Area (sq. ft.)</div> <div>1980</div> </div>	<div> <div>Average Depth (in.)</div> <div>2</div> </div>	<div> <div>Total Estimated Volume of Spill (bbl.)</div> <div>17.6220</div> </div>	
<div> <div>Released to Imaging: 3/6/2025 11:31:23 AM</div> </div>							

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

General Information  
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Online Phone Directory  
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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

Action 422760

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 422760
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2502138142
Incident Name	NAPP2502138142 BLACK PEARL 1 FEDERAL COM 001H @ 0
Incident Type	Produced Water Release
Incident Status	Initial C-141 Received
Incident Facility	[fAPP2202756980] Black Pearl 1 Fed 1H Battery

Location of Release Source	
Please answer all the questions in this group.	
Site Name	Black Pearl 1 Federal Com 001H
Date Release Discovered	01/13/2025
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: Corrosion   Flow Line - Injection   Produced Water   Released: 18 BBL   Recovered: 15 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 422760

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 422760
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

**QUESTIONS**

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

**Initial Response**

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

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

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

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

I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 01/21/2025
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QUESTIONS, Page 3

Action 422760

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 422760
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

**QUESTIONS**

<b>Site Characterization</b>	
<i>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.</i>	
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.
<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	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.

<b>Remediation Plan</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>	
Requesting a remediation plan approval with this submission	No
<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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CONDITIONS

Action 422760

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 422760
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

CONDITIONS

Created By	Condition	Condition Date
scwells	None	1/21/2025

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**Santa Fe, NM 87505**

QUESTIONS

Action 432244

**QUESTIONS**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 432244
	Action Type: [NOTIFY] Notification Of Liner Inspection (C-141L)

**QUESTIONS**

Prerequisites	
Incident ID (n#)	nAPP2502138142
Incident Name	NAPP2502138142 BLACK PEARL 1 FEDERAL COM 001H @ 0
Incident Type	Produced Water Release
Incident Status	Initial C-141 Approved
Incident Facility	[fAPP2202756980] Black Pearl 1 Fed 1H Battery

Location of Release Source	
Site Name	Black Pearl 1 Federal Com 001H
Date Release Discovered	01/13/2025
Surface Owner	Federal

Liner Inspection Event Information	
<i>Please answer all the questions in this group.</i>	
What is the liner inspection surface area in square feet	3,242
Have all the impacted materials been removed from the liner	Yes
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	02/19/2025
Time liner inspection will commence	08:00 AM
Please provide any information necessary for observers to liner inspection	Jacob Laird 575-703-5482
Please provide any information necessary for navigation to liner inspection site	32.60914167, -103.50798333

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CONDITIONS

Action 432244

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 432244
	Action Type: [NOTIFY] Notification Of Liner Inspection (C-141L)




CONDITIONS

Created By	Condition	Condition Date
jlaire	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.	2/14/2025

## Appendix B: Photolog

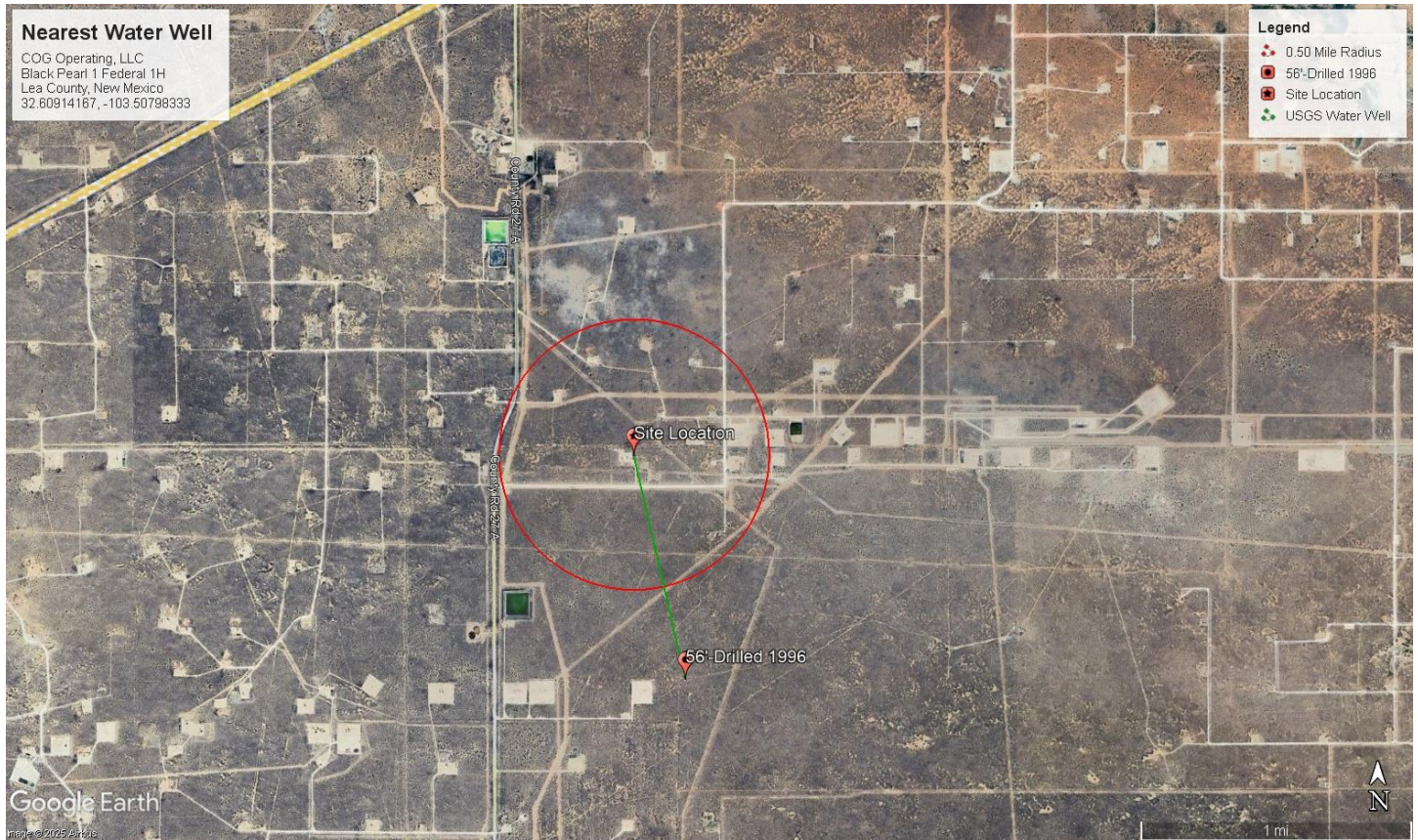


## Photographic Log

<p><b>Facility:</b> Black Pearl 1 Federal 1H</p> <p><b>County:</b> Lea County, New Mexico</p> <p><b>Description:</b> Facility Sign</p>	 <p>Date &amp; Time: Wed, Feb 19, 2025 at 08:00:31 MST  Position: <math>+32.409224^{\circ}</math> / <math>-103.508370^{\circ}</math> (<math>\pm 18.4</math>ft)  Altitude: 3676ft (<math>\pm 9.3</math>ft)  Datum: WGS-84  Azimuth/Bearing: <math>353^{\circ}</math> N07W 6276mils True (<math>\pm 11^{\circ}</math>)  Elevation Angle: <math>-11.6^{\circ}</math>  Horizon Angle: <math>+00.5^{\circ}</math>  Zoom: 0.5X  Black Pearl 1 Federal 1H</p>
<p><b>Facility:</b> Black Pearl 1 Federal 1H</p> <p><b>County:</b> Lea County, New Mexico</p> <p><b>Description:</b> View facing North/Northeast. Pea gravel was removed. Facility was then pressure washed and fluid was removed via vacuum truck.</p>	 <p>Date &amp; Time: Wed, Feb 19, 2025 at 08:02:23 MST  Position: <math>+32.409243^{\circ}</math> / <math>-103.508011^{\circ}</math> (<math>\pm 8.5</math>ft)  Altitude: 3694ft (<math>\pm 9.5</math>ft)  Datum: WGS-84  Azimuth/Bearing: <math>028^{\circ}</math> N28E 0498mils True (<math>\pm 11^{\circ}</math>)  Elevation Angle: <math>-35.4^{\circ}</math>  Horizon Angle: <math>-00.0^{\circ}</math>  Zoom: 0.5X  Black Pearl 1 Federal 1H</p>
<p><b>Facility:</b> Black Pearl 1 Federal 1H</p> <p><b>County:</b> Lea County, New Mexico</p> <p><b>Description:</b> View facing South/Southwest. Pea gravel was removed. Facility was then pressure washed and fluid was removed via vacuum truck</p>	 <p>Date &amp; Time: Wed, Feb 19, 2025 at 08:01:19 MST  Position: <math>+32.409143^{\circ}</math> / <math>-103.507992^{\circ}</math> (<math>\pm 11.8</math>ft)  Altitude: 3700ft (<math>\pm 9.3</math>ft)  Datum: WGS-84  Azimuth/Bearing: <math>123^{\circ}</math> S37E 2187mils True (<math>\pm 11^{\circ}</math>)  Elevation Angle: <math>-20.7^{\circ}</math>  Horizon Angle: <math>+00.1^{\circ}</math>  Zoom: 0.5X  Black Pearl 1 Federal 1H</p>

## Appendix C: Site Characterization and Ground Water





## Neatest Water Well Map

COG Operating, LLC  
Black Pearl 1 Federal 1H  
Lea County, New Mexico  
32.60914167, -103.50798333

National Water Information System: Web Interface

USGS Water Resources

Data Category:

Groundwater

Geographic Area:

New Mexico

GO

Click to hideNews Bulletins

- Explore the NEW [USGS National Water Dashboard](#) interactive map to access real-time water data from over 13,500 stations nationwide.

Groundwater levels for New Mexico

Click to hide state-specific text

 Important: [Next Generation Monitoring Location Page](#)

Search Results -- 1 sites found

Agency code = usgs

site\_no list =

- 323536103301101

Minimum number of levels = 1  
[Save file of selected sites](#) to local disk for future upload

USGS 323536103301101 20S.35E.06.331332

Lea County, New Mexico  
Latitude 32°35'50", Longitude 103°30'17" NAD27  
Land-surface elevation 3,678.00 feet above NGVD29  
The depth of the well is 70 feet below land surface.  
This well is completed in the Other aquifers (N9999OTHER) national aquifer.  
This well is completed in the Ogallala Formation (121OGLL) local aquifer.

Output formats

<a href="#">Table of data</a>
<a href="#">Tab-separated data</a>
<a href="#">Graph of data</a>
<a href="#">Reselect period</a>

Date	Time	? Water-level date-time accuracy	? Parameter code	Water level, feet below land surface	Water level, feet above specific vertical datum	Referenced vertical datum	? Status	? Method of measurement	? Measuring agency	? Source (measur
1961-03-08			D 62610		3619.30	NGVD29	1	Z		
1961-03-08			D 62611		3620.85	NAVD88	1	Z		
1961-03-08			D 72019	58.70			1	Z		
1971-01-21			D 62610		3620.42	NGVD29	1	Z		
1971-01-21			D 62611		3621.97	NAVD88	1	Z		
1971-01-21			D 72019	57.58			1	Z		
1976-02-19			D 62610		3616.76	NGVD29	1	Z		
1976-02-19			D 62611		3618.31	NAVD88	1	Z		
1976-02-19			D 72019	61.24			1	Z		
1986-04-02			D 62610		3621.09	NGVD29	1	Z		
1986-04-02			D 62611		3622.64	NAVD88	1	Z		
1986-04-02			D 72019	56.91			1	Z		
1991-07-03			D 62610		3623.77	NGVD29	1	Z		
1991-07-03			D 62611		3625.32	NAVD88	1	Z		
1991-07-03			D 72019	54.23			1	Z		



Date	Time	? Water-level date-time accuracy	? Parameter code	Water level, feet below land surface	Water level, feet above specific vertical datum	Referenced vertical datum	? Status	? Method of measurement	? Measuring agency	? Source of measurement
1996-03-05			D	62610	3621.61	NGVD29	1		S	
1996-03-05			D	62611	3623.16	NAVD88	1		S	
1996-03-05			D	72019	56.39		1		S	

Explanation		
Section	Code	Description
Water-level date-time accuracy	D	Date is accurate to the Day
Parameter code	62610	Groundwater level above NGVD 1929, feet
Parameter code	62611	Groundwater level above NAVD 1988, feet
Parameter code	72019	Depth to water level, feet below land surface
Referenced vertical datum	NAVD88	North American Vertical Datum of 1988
Referenced vertical datum	NGVD29	National Geodetic Vertical Datum of 1929
Status	1	Static
Method of measurement	S	Steel-tape measurement.
Method of measurement	Z	Other.
Measuring agency		Not determined
Source of measurement		Not determined
Water-level approval status	A	Approved for publication -- Processing and review completed.

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[Explanation of terms](#)  
[Subscribe for system changes](#)

[Accessibility](#)   [FOIA](#)   [Privacy](#)   [Policies and Notices](#)  
[U.S. Department of the Interior](#) | [U.S. Geological Survey](#)  
**Title: Groundwater for New Mexico: Water Levels**  
**URL: <https://nwis.waterdata.usgs.gov/nm/nwis/gwlevels?>**

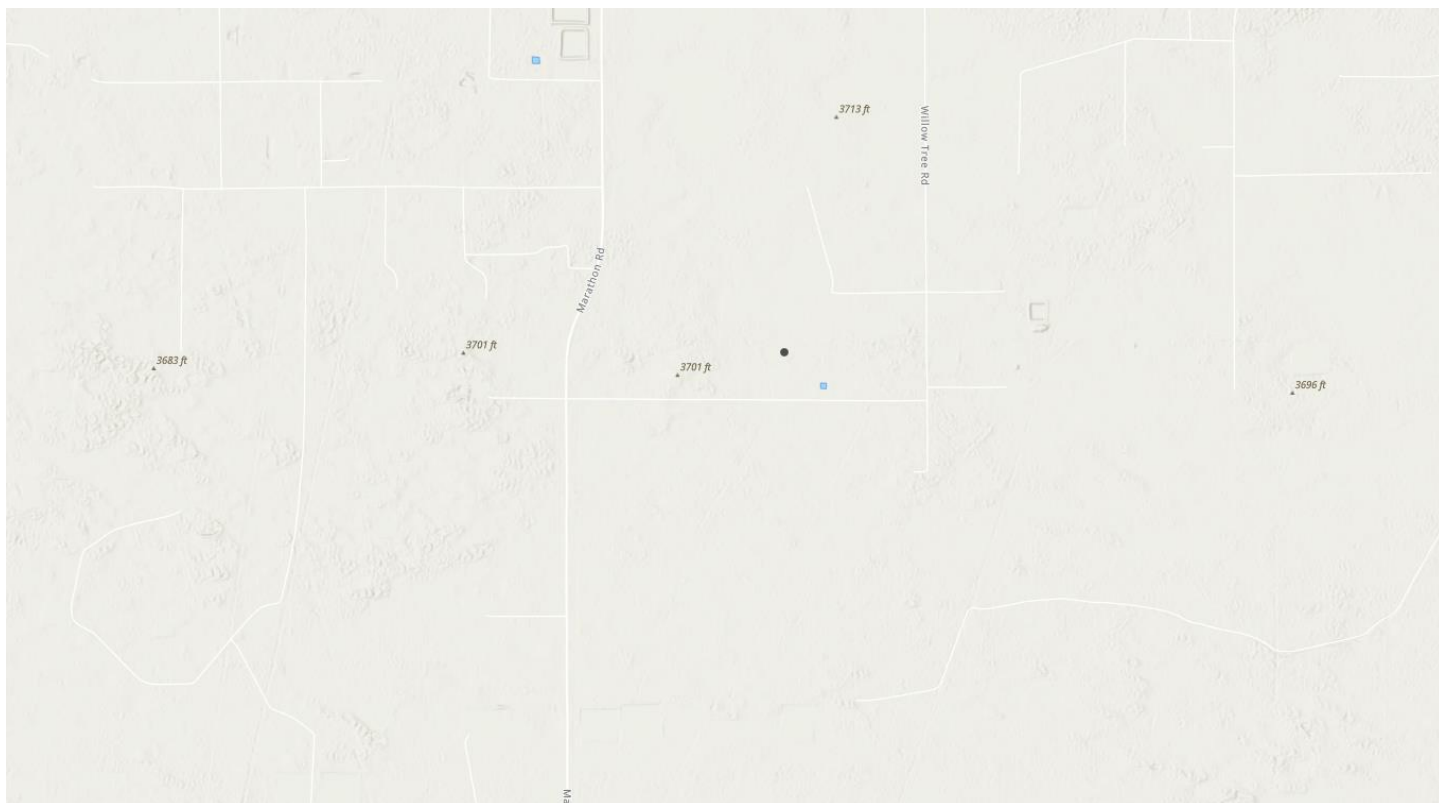


Page Contact Information: [New Mexico Water Data Maintainer](#)  
Page Last Modified: 2024-08-23 09:52:10 EDT  
0.32 0.22 nadww01



## Karst Map

COG Operating, LLC  
Black Pearl 1 Federal 1H  
Lea County, New Mexico  
32.60914167, -103.50798333



## Hydrology Map

COG Operating, LLC  
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QUESTIONS

Action 436508

**QUESTIONS**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 436508
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Prerequisites</b>	
Incident ID (n#)	nAPP2502138142
Incident Name	NAPP2502138142 BLACK PEARL 1 FEDERAL COM 001H @ 0
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Facility	[fAPP2202756980] Black Pearl 1 Fed 1H Battery

**Location of Release Source**

Please answer all the questions in this group.

Site Name	Black Pearl 1 Federal Com 001H
Date Release Discovered	01/13/2025
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: Corrosion   Flow Line - Injection   Produced Water   Released: 18 BBL   Recovered: 15 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 436508

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 436508
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

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

**Initial Response**

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

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

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

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

I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 01/21/2025
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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 436508

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:
	229137
	Action Number:
	436508
Action Type:	
[C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

**QUESTIONS**

<b>Site Characterization</b>	
<i>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.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 51 and 75 (ft.)
What method was used to determine the depth to ground water	U.S. Geological Survey
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	Between ½ and 1 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Between 1 and 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1 and 5 (mi.)
Any other fresh water well or spring	Between 1 and 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1 and 5 (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	Low
A 100-year floodplain	Greater than 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

<b>Remediation Plan</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>	
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	01/14/2025
On what date will (or did) the final sampling or liner inspection occur	02/19/2025
On what date will (or was) the remediation complete(d)	02/19/2025
What is the estimated surface area (in square feet) that will be remediated	3242
What is the estimated volume (in cubic yards) that will be remediated	0
<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 436508

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 436508
	Action Type: [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	Yes
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	Not answered.
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: <a href="mailto:brittany.Esparza@ConocoPhillips.com">brittany.Esparza@ConocoPhillips.com</a> Date: 02/27/2025
<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 436508

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 436508
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Liner Inspection Information</b>	
Last liner inspection notification (C-141L) recorded	<b>432244</b>
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	<b>02/19/2025</b>
Was all the impacted materials removed from the liner	<b>Yes</b>
What was the liner inspection surface area in square feet	<b>3242</b>

**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	<b>Yes</b>
Have the lateral and vertical extents of contamination been fully delineated	<b>Yes</b>
Was this release entirely contained within a lined containment area	<b>Yes</b>
What was the total surface area (in square feet) remediated	<b>3242</b>
What was the total volume (cubic yards) remediated	<b>0</b>
Summarize any additional remediation activities not included by answers (above)	Liner integrity inspection activities were conducted following a release of produced water within a lined containment at the Site. Upon inspection, no rips, tears, holes, or damage was observed, and the liner was determined to be sufficient. The release was contained laterally by the lined containment and the liner was performing as designed.

*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: <a href="mailto:brittany.Esparza@ConocoPhillips.com">brittany.Esparza@ConocoPhillips.com</a> Date: 02/27/2025
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CONDITIONS

Action 436508

CONDITIONS

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	Action Number: 436508
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
scwells	None	3/6/2025