



December 10, 2024

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

**Re: Reclamation Report  
ConocoPhillips  
Sopapilla State 2D CTB Flex Line Release  
Unit Letter M, Section 15, Township 23 South, Range 33 East  
Lea County, New Mexico  
Incident ID: NAPP2115525504**

Sir or Madam:

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips Company (ConocoPhillips) to evaluate a release that occurred along a flex line associated with the Sopapilla State 2D Central Tank Battery (CTB). The release footprint is located in Public Land Survey System (PLSS) Unit Letter M, Section 15, Township 23 South, and Range 33 East, in Lea County, New Mexico (Site). The approximate release point coordinates are 32.29802°, -103.56710°. The Site location is shown on Figures 1 and 2.

## BACKGROUND

According to the State of New Mexico C-141 Initial Report, the release was discovered on May 25, 2021, and approximately 10 barrels (bbls) of crude oil was reported to have been released due to damage caused by internal corrosion within a flex line. This release reportedly occurred in the pasture along the flex line connected to the Sopapilla CTB, and eventually flowed south onto the adjacent lease road. Based upon the reported spill calculator form, the release impacted approximately 552 square feet of surface area. Vacuum trucks were dispatched to remove the freestanding fluids; however, no fluids were reported recovered. The C-141 Form is included in Appendix A.

The New Mexico Oil Conservation Division (NMOCD) was notified of the release on June 4, 2021. The NMOCD received the initial C-141 on June 6, 2021, and subsequently assigned the release the Incident ID NAPP2115525504.

## LAND OWNERSHIP

The Site is located on State Trust Lands, managed by the New Mexico State Land Office (NMSLO). The Site is located under an oil and gas Lease ID VB07290002 for Devon Energy Production Company, LP.

## 2021 SITE ASSESSMENT AND DELINEATION

In order to properly characterize the release footprint and achieve horizontal and vertical delineation of the release extent, Tetra Tech personnel conducted soil sampling on June 25, 2021. A total of ten (10) auger holes were installed within and outside the area in the vicinity of the reported release footprint. Four (4) auger holes (AH-1 through AH-4) were installed inside the release area to achieve vertical delineation. Six (6) auger holes (H-1 through H-6) were installed along the perimeter of the estimated release extent to achieve horizontal delineation. Soil samples collected were field screened for salinity parts per million (ppm) using an ExStik II EC 400 meter.

A total of twenty-two (22) samples were collected from the ten (10) auger holes and submitted to Cardinal Laboratories (Cardinal) in Hobbs, New Mexico to be analyzed for chlorides via Standard Method 4500-Cl, TPH via EPA Method 8015M, and BTEX via EPA Method 8021B.

Results from the June 2021 soil sampling event are summarized in Table 1. Analytical results associated with the sample locations AH-3 and AH-4 exceeded reclamation limits for chlorides (600 mg/kg) in the upper 4 feet. Analytical results associated with AH-3 exceeded the reclamation limits for TPH (100 mg/kg) in the 0–1-foot below ground surface (bgs) interval. Analytical results from soil samples collected below four feet in AH-3 and AH-4 did not exceed the recommended remedial action level (RRAL) for chloride of 10,000 mg/kg.

There were no other analytical results from samples collected in June 2021 which exceeded the Site reclamation limits or RRALs for TPH, chlorides, or BTEX in the perimeter or the interior boring locations. The analytical results associated with the remainder of the samples analyzed were below the Site remediation and reclamation RRALs for all constituents. However, after review of the analytical results from the sampling events, additional delineation was required following the June 2021 soil assessment activities.

On August 31, 2021, Tetra Tech personnel returned to the Site to complete three (3) soil borings (BH-1 through BH-3) using an air rotary drilling rig, to delineate and clarify the release extent in the vicinity of previously sampled locations AH-3, AH-4, and H-3. A total of sixteen (16) samples were collected from the three (3) borings and submitted to Eurofins-Xenco to be analyzed for TPH, BTEX, and chloride.

Results from the September 2021 soil sampling event are summarized in Table 2. The analytical results associated with BH-1 boring location exceeded the Site reclamation RRAL for chlorides (600 mg/kg) in the 0–1-foot bgs interval. Analytical results associated with BH-2 exceeded the reclamation RRAL for TPH (100 mg/kg) in the 0–1-foot bgs interval.

There were no other analytical results from samples collected in August 2021 which exceeded the reclamation limits or Site RRALs for TPH, chlorides, or BTEX in the perimeter or the interior boring locations. The analytical results associated with the remainder of the samples analyzed were below the Site remediation and reclamation RRALs for all constituents. After review of the analytical results from the sampling events, both horizontal and vertical delineation was achieved following the August 2021 soil assessment activities. The 2021 assessment sampling locations are indicated in Figure 3.

## 2021 DEFERRAL REQUEST

A Release Characterization and Deferral Request was prepared by Tetra Tech on behalf of ConocoPhillips and submitted to the NMOCD on September 23, 2021. The report described the assessment activities and results. A copy of the 2021 deferral request is available on the NMOCD online incident files.

The deferral request was rejected by Chad Hensley of the NMOCD via email on October 14, 2021, included in Appendix B. Reasons for rejection included in the email were:

- *“Deferral is not eligible for off-pad release.*
- *Remediation plan due 11/25/2021.”*

## 2021 REMEDIATION WORK PLAN

Following the NMOCD rejection of the deferral request, a Release Characterization and Remediation Work Plan was prepared by Tetra Tech on behalf of ConocoPhillips and submitted to the NMOCD on October 22, 2021. In this report, ConocoPhillips proposed to excavate the delineated release extent to a maximum depth of 4 feet bgs. Additionally, ConocoPhillips proposed an alternative confirmation sampling plan to collect confirmation samples representative of approximately 500 square feet of excavated area. Reclamation and restoration activities were proposed for the off-lease pasture areas. A copy of the 2021 work plan is available on the OCD online incident files.

The 2021 work plan was approved by Chad Hensley of the NMOCD via email on November 29, 2021, included in Appendix B, with the following comments:

- "Closure report due 03/28/2022."

## NMSLO CLOSURE APPROVAL

As the release footprint is located on State Trust Lands, managed by the NMSLO, additional correspondence with the landowner was required. ConocoPhillips representatives and NMSLO representatives engaged in email correspondence regarding the incident and the release footprint. In an email submission dated January 26, 2023, ConocoPhillips requested closure of the release incident with the NMSLO Environmental Compliance Office (ECO).

Following a review of the incident files, release closure with the NMSLO was approved by Tammy Honea via email on January 27, 2023. A copy of the NMSLO approval correspondence is included in Appendix B.

## 2023 ADDITIONAL ASSESSMENT

Based on the approved closure from the NMSLO ECO, Tetra Tech remobilized to the Site on October 25, 2023, to conduct additional assessment activities in order to evaluate current Site conditions. A total of four (4) auger holes were installed within the area of the previously identified release footprint. These supplemental hand auger borehole locations are shown on Figure 4. Photographic documentation of the release area is included in Appendix C.

A total of six (6) samples were collected from the four (4) auger holes and submitted to Cardinal Laboratories (Cardinal) in Hobbs, New Mexico to be analyzed for chlorides via EPA Method 4500.0, TPH via EPA Method 8015M, and BTEX via EPA Method 8021B.

Results from the October 2023 soil sampling event are summarized in Table 3. Analytical results associated with the sample location AH-23-3 exceeded the reclamation limit for chlorides (600 mg/kg) in the 0–1-foot bgs interval (1,880 mg/kg), but the result was well below the Site RRAL (10,000 mg/kg). The AH-23-3 location is not in the pasture, but rather in an existing lease road. The analytical results associated with the remainder of the samples analyzed were below the Site reclamation limits and RRALs for all constituents.

## 2024 CLOSURE REQUEST

A Closure Request Report dated January 3, 2024, was prepared by Tetra Tech on behalf of ConocoPhillips following the additional assessment and evaluation of the site. The Closure Request Report provided the Site Characterization in accordance with 19.15.29.11 NMAC and described assessment activities performed at the Site in accordance with 19.15.29.12 NMAC and 19.15.29.14 NMAC.

In consideration of the documented NMSLO approval for closure of the release incident, as well as the results of the October 2023 assessment which demonstrate that remaining soil concentrations are all below the Site RRALs, and below reclamation limits in vegetated pasture areas, ConocoPhillips requested a variance to leave soils above the reclamation limit for chlorides in place. The portion of the release that exceeds the reclamation limit for chlorides is limited to approximately 21 cubic yards (approximately 570 square feet to a depth of 1 foot) of active lease road. The primary purpose of reclamation is to re-establish vegetative growth, which is not applicable for the lease road.

The release impact is fully delineated and groundwater in this area is greater than 55 feet below surface. Soil concentrations in this area are well below the Site RRAL of 10,000 mg/kg for chlorides, and thus do not cause an imminent risk to human health, the environment, or groundwater.

Reclamation Report  
December 10, 2024

ConocoPhillips

The Closure Request Report was submitted to the NMOCD on January 23, 2024. The Closure Report was approved by the NMOCD on April 8, 2024. The incident status is listed as *Remediation Closure Report Approved, Pending submission of Reclamation Report from the operator.*

### PROPOSED SITE RECLAMATION PLAN

As stated above, this incident is located on an active lease road. The reclamation requirements in 19.15.29.13 NMAC will be implemented when the entire production area is abandoned, as this lease road provides access to multiple lease pads in the vicinity. Reclamation activities will be implemented in consultation with the NMSLO in accordance with 19.2.100.67 NMAC for surface reclamations on State Oil and Gas Leases. ConocoPhillips will notify the NMSLO when reclamation and re-vegetation activities are complete.

It is proposed that once the surrounding lease pads are abandoned and reclaimed, the lease road can be reclaimed. The lease road will be reclaimed in accordance with 19.2.100.67.C as described for roads, "... Roads shall be left in place only if authorized by the state land office. If any road is not needed, then, within one year of permanent abandonment, it shall be ripped, reseeded, bermed (closed) at the entrance, and water bars shall be constructed as directed or approved by the state land office".

Based on the soils of the Site (predominantly Kermit soils and Dune land), the NMSLO Sandy (S) Seed Mixture will be used for seeding and will be planted in the amount specified in the pounds pure live seed (PLS) per acre. The seed mixture will be spread by a drill equip with a depth regulator or a hand-held broadcaster and raked. If a hand-held broadcaster is used for dispersal, the pounds pure live seed per acre will be doubled. The seed mix is included in Appendix D.

### CONCLUSION

Based on the results of the assessment activities and confirmation sampling, ConocoPhillips respectfully requests approval of the reclamation plan associated with this incident. A final re-vegetation report will be submitted when uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent of pre-disturbance levels and a total percent plant cover of at least seventy percent of pre-disturbance levels, excluding noxious weeds. If you have any questions concerning the reclamation activities performed at the Site, please call me at (512) 596-8201.

Sincerely,

**Tetra Tech, Inc.**



Lisbeth Chavira  
Project Manager



Samantha K. Abbott, P.G.  
Senior Project Manager

cc:  
Mr. Jacob Laird, GPBU – ConocoPhillips



Reclamation Report  
December 10, 2024

ConocoPhillips

## LIST OF ATTACHMENTS

### Figures:

- Figure 1 – Overview Map
- Figure 2 – Topographic Map
- Figure 3 – Approximate Release Extent and Assessment
- Figure 4 – 2023 Additional Assessment

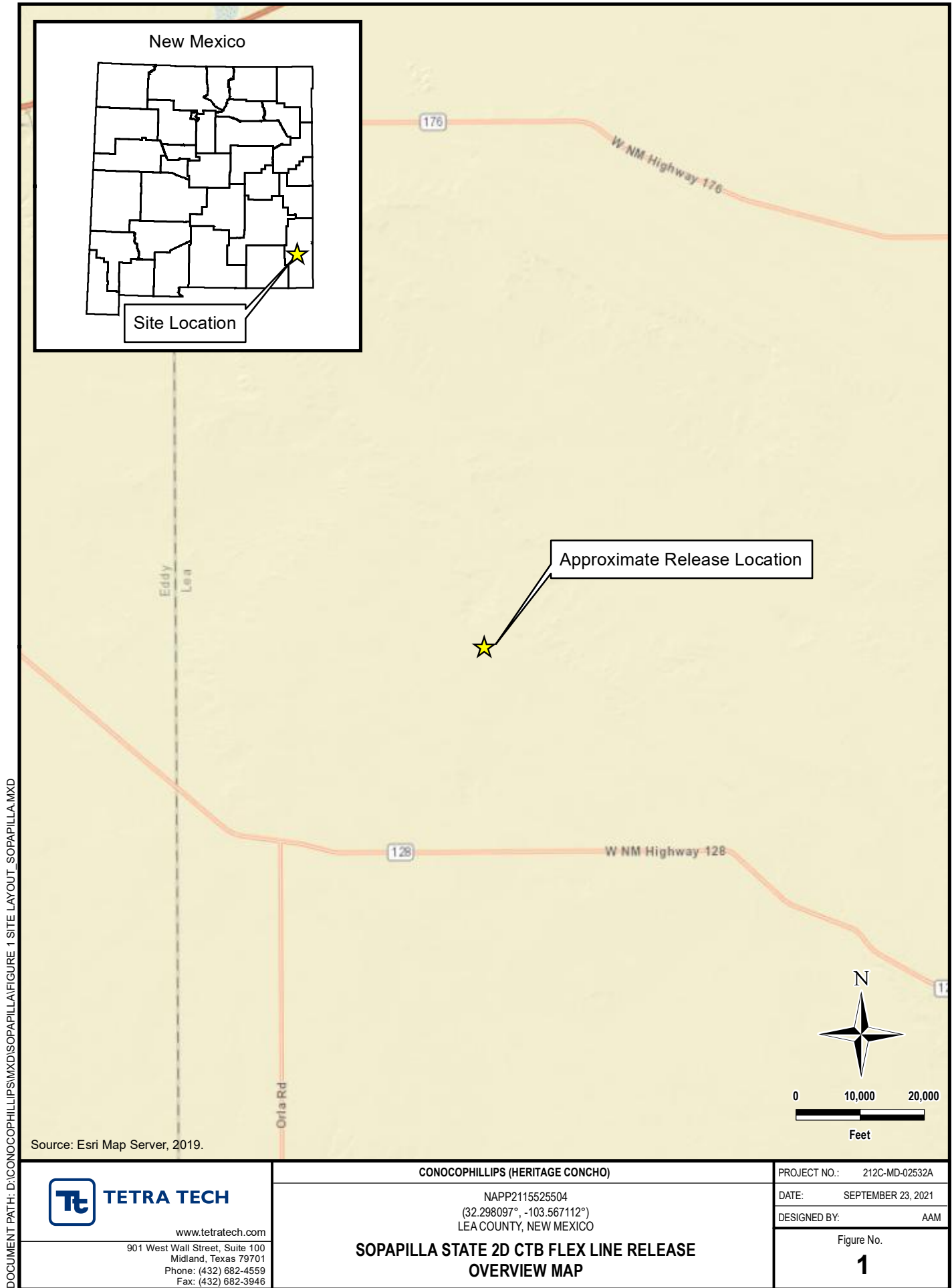
### Tables:

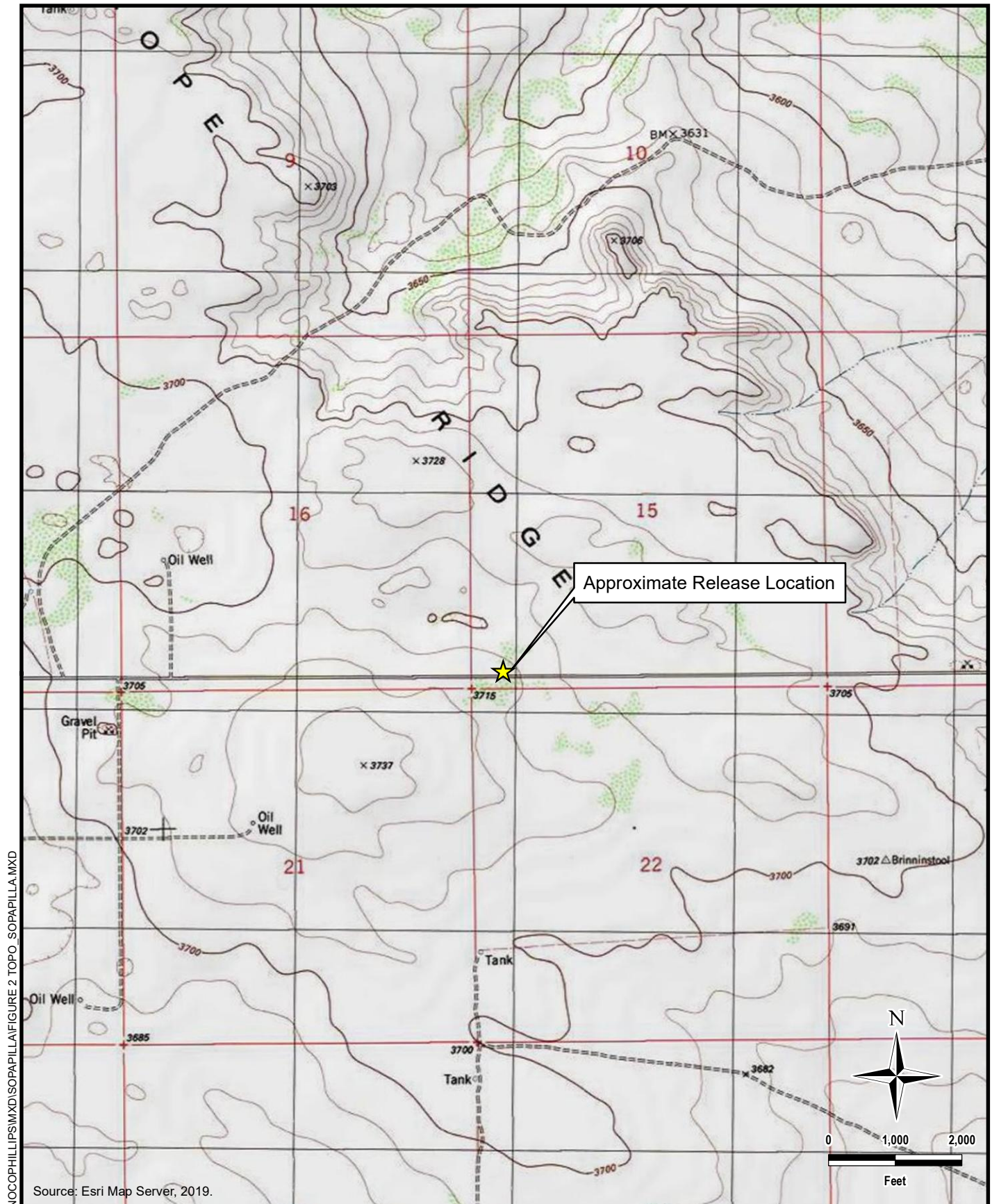
- Table 1 – Summary of Analytical Results – Initial Soil Assessment
- Table 2 – Summary of Analytical Results – Additional Soil Assessment
- Table 3 – Summary of Analytical Results – 2023 Additional Soil Assessment

### Appendices:

- Appendix A – C-141 Forms
- Appendix B - Regulatory Correspondence
- Appendix C – Photographic Documentation
- Appendix D – Seed Mixture

## **FIGURES**





DOCUMENT PATH: D:\CONOCOPHILLIPS\MXD\SOPAPILLA\FIGURE 2 TOPO SOPAPILLA.MXD


**TETRA TECH**
[www.tetrattech.com](http://www.tetrattech.com)

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

CONOCOPHILLIPS (HERITAGE CONCHO)

 NAPP2115525504  
 (32.298097°, -103.567112°)  
 LEA COUNTY, NEW MEXICO

### SOPAPILLA STATE 2D CTB FLEX LINE RELEASE TOPOGRAPHIC MAP

PROJECT NO.: 212C-MD-02532A

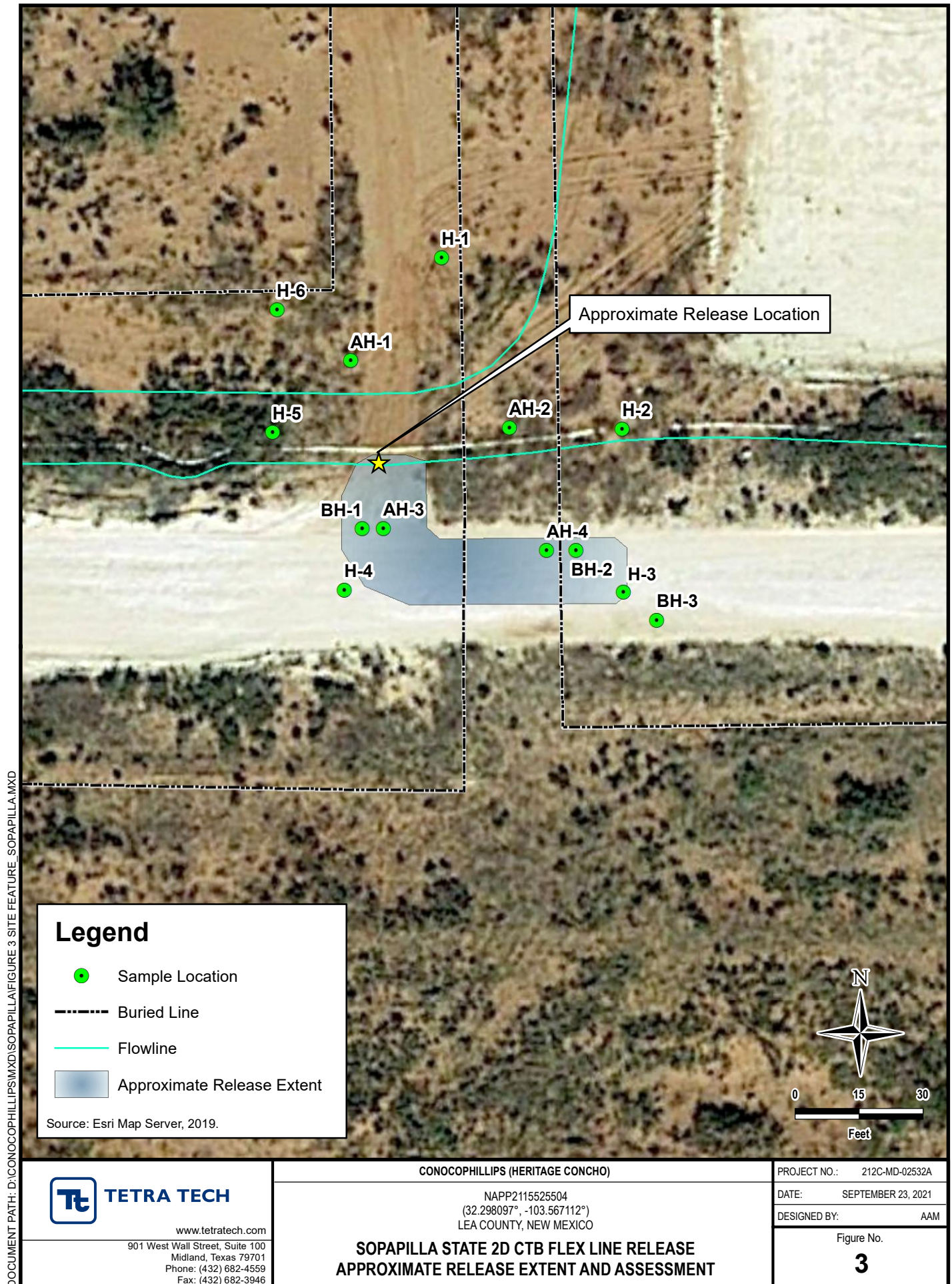
DATE: SEPTEMBER 23, 2021

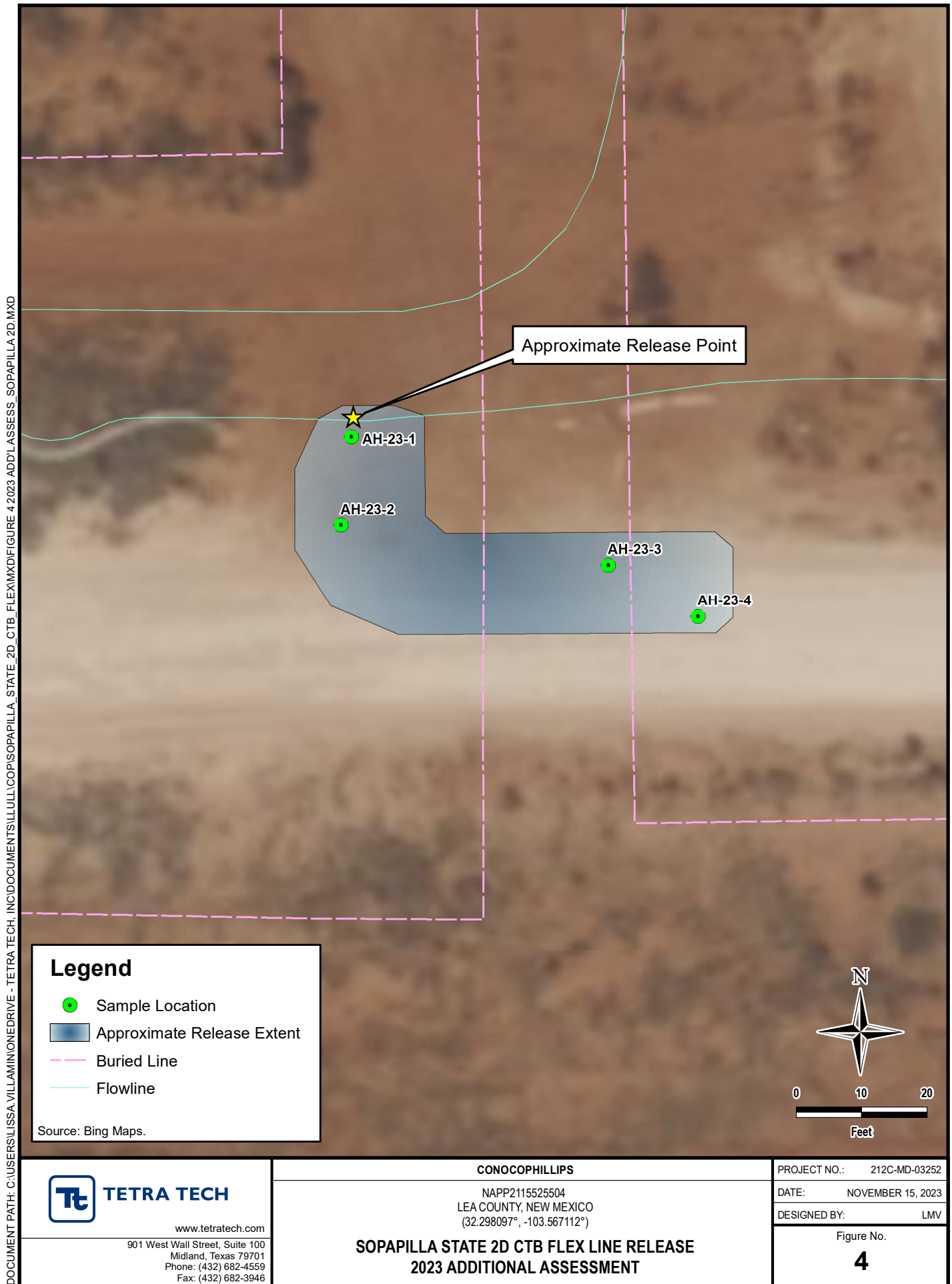
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Figure No.

**2**









## **TABLES**

TABLE 1  
SUMMARY OF ANALYTICAL RESULTS  
SOIL ASSESSMENT- NAPP2115525504  
HERITAGE CONCHO  
SOPAPILLA STATE 2D CTB FLEX LINE RELEASE  
LEA COUNTY, NEW MEXICO

Sample ID	Sample Date	Sample Depth Interval	Field Screening Results		Chloride <sup>1</sup>		BTEX <sup>2</sup>										TPH <sup>3</sup>							
			Chloride	PID			Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO		DRO		ORO		Total TPH	
		mg/kg			Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	C <sub>6</sub> - C <sub>10</sub>	Q	> C <sub>10</sub> - C <sub>28</sub>	Q	> C <sub>28</sub> - C <sub>36</sub>		
		ft. bgs	ppm		mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q
AH-1	6/25/2021	0 - 1	-	-	32		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0	
		1 - 1.5	-	-	16		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0	
		2 - 2.5	-	-	64		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0	
		3 - 3.5	-	-	64		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0	
AH-2	6/25/2021	0 - 1	-	-	32		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0	
		1 - 1.5	-	-	<16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0	
AH-3	6/25/2021	0 - 1	-	-	2600		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0	
		1 - 1.5	-	-	4960		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0	
		2 - 2.5	-	-	3280		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0	
		3 - 3.5	-	-	4960		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0	
		4 - 4.5	-	-	7600		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0	
AH-4	6/25/2021	0 - 1	-	-	3600		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		25.9		<10.0		25.9	
		1 - 1.5	-	-	3280		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0	
		2 - 2.5	-	-	1540		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0	
		3 - 3.5	-	-	2680		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0	
		4 - 4.5	-	-	6880		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0	
H-1	6/25/2021	0 - 1	-	-	<16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0	
H-2	6/25/2021	0 - 1	-	-	<16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0	
H-3	6/25/2021	0 - 1	-	-	208		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		69.7		40.3		110	
H-4	6/25/2021	0 - 1	-	-	80		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0	
H-5	6/25/2021	0 - 1	-	-	336		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0	
H-6	6/25/2021	0 - 1	-	-	16		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		<10.0	

## NOTES:

ft. Feet

bgs Below ground surface

ppm Parts per million

mg/kg Milligrams per kilogram

TPH Total Petroleum Hydrocarbons

GRO Gasoline range organics

DRO Diesel range organics

ORO Oil range organics

1 EPA Method 300.0

2 EPA Method 8021B

3 EPA Method 8015B NM

**Bold and italicized values indicate exceedance of proposed Remediation RRLs and/or Reclamation Requirements.**

Shaded rows indicate intervals proposed for excavation.

## QUALIFIERS:

\*1 LCS/LCSD RPD exceeds control limits.

TABLE 2  
SUMMARY OF ANALYTICAL RESULTS  
ADDITIONAL SOIL ASSESSMENT- NAPP2115525504  
HERITAGE CONCHO  
SOPAPILLA STATE 2D CTB FLEX LINE RELEASE  
LEA COUNTY, NEW MEXICO

Sample ID	Sample Date	Sample Depth Interval	Field Screening Results		Chloride <sup>1</sup>		BTEX <sup>2</sup>										TPH <sup>3</sup>							
			Chloride	PID			Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO		DRO		ORO		Total TPH	
			ft. bgs	ppm	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q		
BH-1	8/31/2021	0 - 1	-	-	<b>615</b>		< 0.00199		< 0.00199		< 0.00199		< 0.00398		0.00398		< 49.9		< 49.9	*1	< 49.9		< 49.9	
		2 - 3	620	-	280		< 0.00200		< 0.00200		< 0.00200		< 0.00399		0.00399		< 49.8		< 49.8	*1	< 49.8		< 49.8	
		4 - 5	948	-	884		< 0.00198		< 0.00198		< 0.00198		< 0.00397		0.00397		< 49.9		< 49.9	*1	< 49.9		< 49.9	
		6 - 7	510	-	341		< 0.00199		< 0.00199		< 0.00199		< 0.00398		0.00398		< 49.8		< 49.8	*1	< 49.8		< 49.8	
		9 - 10	806	-	1,010		< 0.00200		< 0.00200		< 0.00200		< 0.00401		0.00401		< 49.9		< 49.9	*1	< 49.9		< 49.9	
		14 - 15	605	-	492		< 0.00200		< 0.00200		< 0.00200		< 0.00399		0.00399		< 49.9		< 49.9	*1	< 49.9		< 49.9	
		19 - 20	381	-	314		< 0.00201		< 0.00201		< 0.00201		< 0.00402		0.00402		< 49.8		< 49.8	*1	< 49.8		< 49.8	
BH-2	8/31/2021	0 - 1	-	-	67.4		< 0.00202		< 0.00202		< 0.00202		< 0.00403		0.00403		< 50.0		1830	*1	334		<b>2,160</b>	
		2 - 3	184	-	40.1		< 0.00202		< 0.00202		< 0.00202		< 0.00403		0.00403		< 50.0		< 50.0	*1	< 50.0		< 50.0	
		4 - 5	629	-	294		< 0.00201		< 0.00201		< 0.00201		< 0.00402		0.00402		< 49.9		105	*1	< 49.9		105	
		6 - 7	487	-	392		< 0.00200		< 0.00200		< 0.00200		< 0.00399		0.00399		< 49.9		< 49.9	*1	< 49.9		< 49.9	
		9 - 10	391	-	295		< 0.00199		< 0.00199		< 0.00199		< 0.00398		0.00398		< 49.8		67.9	*1	< 49.8		67.9	
BH-3	8/31/2021	0 - 1	73.8	-	23.4		< 0.00199		< 0.00199		< 0.00199		< 0.00398		0.00398		< 49.9		< 49.9	*1	< 49.9		< 49.9	
		2 - 3	64.5	-	24.7		< 0.00200		< 0.00200		< 0.00200		< 0.00399		0.00399		< 50.0		< 50.0	*1	< 50.0		< 50.0	
		4 - 5	201	-	89.5		< 0.00200		< 0.00200		< 0.00200		< 0.00401		0.00401		< 49.8		< 49.8	*1	< 49.8		< 49.8	

## NOTES:

ft. Feet  
bgs Below ground surface  
ppm Parts per million  
mg/kg Milligrams per kilogram  
TPH Total Petroleum Hydrocarbons  
GRO Gasoline range organics  
DRO Diesel range organics  
ORO Oil range organics  
1 EPA Method 300.0  
2 EPA Method 8021B  
3 EPA Method 8015B NM

**Bold and italicized values indicate exceedance of proposed Remediation RRALs and/or Reclamation Requirements.**

Shaded rows indicate intervals proposed for excavation.

## QUALIFIERS:

\*1 LCS/LCSD RPD exceeds control limits.

TABLE 3  
SUMMARY OF ANALYTICAL RESULTS  
2023 SOIL ASSESSMENT- NAPP2115525504  
CONOCOPHILLIPS  
Sopapilla State 2D CTB Flex Line Release  
LEA COUNTY, NM

19.15.29.12 NMAC Closure Criteria for Soils Impacted by a Release (> 55ft):			Chlorides <sup>1</sup>		BTEX <sup>2</sup>										TPH <sup>3</sup>							
Sample ID	Sample Date	Sample Depth Interval	< 600 mg/kg		< 10 mg/kg		Toluene		Ethylbenzene		Total Xylenes		< 50 mg/kg		GRO		DRO		EXT DRO		< 100 mg/kg	-
			Chloride		Benzene																Total TPH (GRO+DRO+EXT DRO)	GRO+DRO
			ft. bgs	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg
AH-23-1	10/24/2023	-	176		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	-
AH-23-2	10/24/2023	-	<16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	-
AH-23-3	10/24/2023	0-1	<b>1,880</b>		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	-
		2-3	576		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	-
		3-4	176		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	-
AH-23-4	10/24/2023	-	256		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	-

## NOTES:

ft. Feet

bgs Below ground surface

mg/kg Milligrams per kilogram

TPH Total Petroleum Hydrocarbons

GRO Gasoline range organics

DRO Diesel range organics

1 Method SM4500Cl-B

2 Method 8021B

3 Method 8015M

***Bold and italicized values indicate exceedance of proposed RRALs and Reclamation Requirements.***

Shaded rows indicate intervals proposed for excavation.

## **APPENDIX A C-141 FORMS**

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

Form C-141  
Revised August 24, 2018  
Submit to appropriate OCD District office

Incident ID	NAPP2115525504
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party	COG Operating, LLC	OGRID	229137
Contact Name	Kelsy Waggaman	Contact Telephone	(432) 688-9057
Contact email	Kelsy.Waggaman@conocophillips.com	Incident # (assigned by OCD)	
Contact mailing address	600 West Illinois Avenue, Midland, Texas 79701		

Location of Release Source

Latitude 32.29802 Longitude -103.56710  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	Sopapilla State 2D CTB	Site Type	Flow Line
Date Release Discovered	May 25, 2021	API# (if applicable)	

Unit Letter	Section	Township	Range	County
M	15	23S	33E	Lea

Surface Owner: ☒ State ☐ Federal ☐ Tribal ☐ Private (Name: \_\_\_\_\_)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input checked="" type="checkbox"/> Crude Oil	Volume Released (bbls) 10	Volume Recovered (bbls) 0
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

The release was caused by a flex line that was damaged due to internal corrosion.  
The release was in the pasture. A vacuum truck was dispatched to remove all freestanding fluids.  
Concho will evaluate the site to determine if we may commence remediation immediately or delineate any possible impact from the release and we will present a remediation work plan to the NMOCD for approval prior to any significant remediation activities.




State of New Mexico  
Oil Conservation Division

Incident ID	NAPP2115525504
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC?  <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?	

**Initial Response**

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

<input checked="" type="checkbox"/> The source of the release has been stopped.	
<input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment.	
<input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.	
<input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why:	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
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	Brittany N. Esparza
Signature: 	Title: HSE Administrative Assistant
email: besparza@concho.com	Date: 6/4/2021
	Telephone: (432) 221-0398
<b><u>OCD Only</u></b>	
Received by: Ramona Marcus	Date: 6/6/2021

NAPP2115525504

Facility Name & Number:		Sopapilla SWD Flex Leak				
Asset Area:		hConcho, Lea County				
Release Discovery Date & Time:		5/25/2021				
Release Type:		Produced Water				
Provide any known details about the event:		Lat 32.29802, Lon -103.56710, SWD flex line damaged by unknown party, OFF LOCATION				
<b>Spill Calculation - Subsurface Spill - Rectangle</b>						
Was the release on pad or off-pad?					See reference table below	
Has it rained at least a half inch in the last 24 hours?					See reference table below	
Convert Irregular shape into a series of rectangles	Length (ft.)	Width (ft.)	Depth (in.)	Soil Spilled-Fluid Saturation	Estimated volume of each area (bbl.)	Total Estimated Volume of Spill (bbl.)
Rectangle A	24.0	23.0	8.00	15.12%	65.504	9.904
Rectangle B					0.000	0.000
Rectangle C					0.000	0.000
Rectangle D					0.000	0.000
Rectangle E					0.000	0.000
Rectangle F					0.000	0.000
Rectangle G					0.000	0.000
Rectangle H					0.000	0.000
Rectangle I					0.000	0.000
Rectangle J					0.000	0.000
Total Volume Release:						9.904

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1000 Rio Brazos Rd., Aztec, NM 87410  
Phone:(505) 334-6178 Fax:(505) 334-6170  
**District IV**  
1220 S. St Francis Dr., Santa Fe, NM 87505  
Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS  
  
Action 30576

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 30576
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
rmarcus	None	6/6/2021

Incident ID	NAPP2115525504
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?	400 (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input checked="" 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

Incident ID	NAPP2115525504
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: Kelsy Waggaman Title: Environmental Engineer

Signature:  Date: 9/23/21

email: kelsy.waggaman@conocophillips.com Telephone: 505-577-9071

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Incident ID	NAPP2115525504
District RP	
Facility ID	
Application ID	

## Remediation Plan


**Remediation Plan Checklist:** *Each of the following items must be included in the plan.*

- ☒ Detailed description of proposed remediation technique
- ☒ Scaled sitemap with GPS coordinates showing delineation points
- ☒ Estimated volume of material to be remediated
- ☒ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☒ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

**Deferral Requests Only:** *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- ☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- ☐ Extents of contamination must be fully delineated.
- ☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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: Kelsy Waggaman Title: Environmental Engineer  
Signature:  Date: 10-21-21  
email: kelsy.waggaman@conocophillips.com Telephone: 505-577-9071

**OCD Only**

Received by: Chad Hensley Date: 11/29/2021

☐ Approved ☒ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature:  Date: 11/29/2021



State of New Mexico  
Oil Conservation Division

Incident ID	NAPP2115525504
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: Jacob Laird Title: Environmental Engineer

Signature: *Jacob Laird* Date: 1/3/2024

email: Jacob.Laird@conocophillips.com Telephone: 575-703-5482

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: \_\_\_\_\_ Date: \_\_\_\_\_

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

## **APPENDIX B**

### **Regulatory Correspondence**

**From:** [Hamlet, Robert, EMNRD](#)  
**To:** [Esparza, Brittany](#)  
**Cc:** [Gonzalez, Jessika L](#); [Waggaman, Kelsy](#); [Bratcher, Mike, EMNRD](#); [Hensley, Chad, EMNRD](#)  
**Subject:** (Extension Approval) Sopapilla State 2D CTB (NAPP2115525504) 05-25-2021  
**Date:** Thursday, August 26, 2021 8:43:00 AM

---

RE: Incident #**NAPP2115525504**

**Brittany,**

Your request for an extension to **September 25th, 2021** is approved.

**Robert Hamlet** • Environmental Specialist - Advanced  
Environmental Bureau  
EMNRD - Oil Conservation Division  
811 S. First Street | Artesia, NM 88210  
575.909.0302 | [robert.hamlet@state.nm.us](mailto:robert.hamlet@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>



---

**From:** Esparza, Brittany <[Brittany.Esparza@conocophillips.com](mailto:Brittany.Esparza@conocophillips.com)>  
**Sent:** Tuesday, August 24, 2021 9:17 AM  
**To:** EMNRD-OCD-District1spills <[EMNRD-OCD-District1spills@state.nm.us](mailto:EMNRD-OCD-District1spills@state.nm.us)>; [spills@slo.state.nm.us](mailto:spills@slo.state.nm.us)  
**Cc:** Gonzalez, Jessika L <[Jessika.L.Gonzalez@conocophillips.com](mailto:Jessika.L.Gonzalez@conocophillips.com)>; Waggaman, Kelsy <[Kelsy.Waggaman@conocophillips.com](mailto:Kelsy.Waggaman@conocophillips.com)>; Esparza, Brittany <[Brittany.Esparza@conocophillips.com](mailto:Brittany.Esparza@conocophillips.com)>  
**Subject:** (Extension Request #1) Sopapilla State 2D CTB (NAPP2115525504) 05-25-2021

To Whom it May Concern,

Under the new spill rule a Work Plan or Closure Report is due for the above release on August 25, 2021. COG is requesting a one-month extension until September 25, 2021 in order to schedule drillers for site.

Please let me know if you have any questions or concerns.

Thank you,

*Brittany N. Esparza*

**Brittany N. Esparza** | Environmental Technician, Permian | **ConocoPhillips**  
**O:** 432-221-0398 | **C:** 432-349-1911 | 3CC-2064 Midland, Texas

**From:** [OCDOnline@state.nm.us](mailto:OCDOnline@state.nm.us)  
**To:** [Lull, Christian](#)  
**Subject:** The Oil Conservation Division (OCD) has rejected the application, Application ID: 51635  
**Date:** Thursday, October 14, 2021 9:14:12 AM

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

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

The OCD has rejected the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nAPP2115525504, for the following reasons:

- **Deferral is not eligible for off-pad release.**
- **Remediation plan due 11/25/2021**

The rejected C-141 can be found in the OCD Online: Permitting - Action Status, under the Application ID: 51635.

Please review and make the required correction(s) prior to resubmitting.

If you have any questions why this application was rejected or believe it was rejected in error, please contact me prior to submitting an additional C-141.

Thank you,  
Chad Hensley  
Environmental Science & Specialist  
575-703-1723  
[Chad.Hensley@state.nm.us](mailto:Chad.Hensley@state.nm.us)

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

**From:** [OCDOnline@state.nm.us](mailto:OCDOnline@state.nm.us)  
**To:** [Llull, Christian](#)  
**Subject:** The Oil Conservation Division (OCD) has approved the application, Application ID: 57436  
**Date:** Monday, November 29, 2021 10:12:47 AM

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

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

The OCD has approved the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nAPP2115525504, with the following conditions:

- **Closure report due 03/28/2022**

The signed C-141 can be found in the OCD Online: Imaging under the incident ID (n#).

If you have any questions regarding this application, please contact me.

Thank you,  
Chad Hensley  
Environmental Science & Specialist  
575-703-1723  
[Chad.Hensley@state.nm.us](mailto:Chad.Hensley@state.nm.us)

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

**Received by:** [ECO@nmslo.state.nm.us](mailto:ECO@nmslo.state.nm.us)  
**Sent on:** Friday, January 27, 2023 10:46:39 PM  
**To:** Esparza, Brittany <Brittany.Esparza@conocophillips.com>  
**Subject:** [EXTERNAL]Closure for Sopapilla State 2D CTB

**Follow up:** Follow up  
**Start date:** Monday, January 30, 2023 12:00:00 AM  
**Due date:** Monday, January 30, 2023 12:00:00 AM

**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.

Good afternoon, Brittany

Thank you for your email dated 1-26-2023.

The NMSLO Environmental Compliance Office (ECO) has reviewed your documents related to the release that occurred on 5-25-2021 at Sopapilla State 2D CTB and we agree that this matter may be closed.

Thank you for all your submissions on this incident and have a good weekend,

Tammy Honea  
ECO Administrative Support  
Surface Division  
Hobbs District Office  
575.392.8736  
New Mexico State Land Office  
914 N. Linam Street  
Hobbs, NM 88240  
thonea@slo.state.nm.us  
[nmstatelands.org](http://nmstatelands.org)



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**District I**  
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**District IV**  
1220 S. St Francis Dr., Santa Fe, NM 87505  
Phone:(505) 476-3470 Fax:(505) 476-3462

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

QUESTIONS  
  
Action 306592

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:	229137
	Action Number:	306592
	Action Type:	
	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2115525504
Incident Name	NAPP2115525504 SOPAPILLA STATE 2D CTB @ 0
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received

Location of Release Source	
Please answer all the questions in this group.	
Site Name	SOPAPILLA STATE 2D CTB
Date Release Discovered	05/25/2021
Surface Owner	State

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

Nature and Volume of Release	
Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.	
Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Corrosion   Flow Line - Production   Produced Water   Released: 10 BBL   Recovered: 0 BBL   Lost: 10 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	No
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.

**District I**

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**District IV**

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Phone:(505) 476-3470 Fax:(505) 476-3462

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

QUESTIONS, Page 2

Action 306592

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:	229137
	Action Number:	306592
	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)	<b>No, according to supplied volumes this does not appear to be a "gas only" report.</b>
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	<b>No</b>
Reasons why this would be considered a submission for a notification of a major release	<i>Unavailable.</i>
<i>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.</i>	

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

*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: 01/23/2024
--	---

**District I**  
1625 N. French Dr., Hobbs, NM 88240  
Phone:(575) 393-6161 Fax:(575) 393-0720  
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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 306592

QUESTIONS (continued)

Operator:  COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:	229137
	Action Number:	306592
	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 100 and 500 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
<b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>	
A continuously flowing watercourse or any other significant watercourse	Greater than 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 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	Greater than 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	None
A 100-year floodplain	Greater than 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	Yes

<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	No
<b>Soil Contamination Sampling:</b> (Provide the highest observable value for each, in milligrams per kilograms.)	
Chloride (EPA 300.0 or SM4500 Cl B)	0
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	0
GRO+DRO (EPA SW-846 Method 8015M)	0
BTEX (EPA SW-846 Method 8021B or 8260B)	0
Benzene (EPA SW-846 Method 8021B or 8260B)	0
<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	01/24/2024
On what date will (or did) the final sampling or liner inspection occur	01/24/2024
On what date will (or was) the remediation complete(d)	01/24/2024
What is the estimated surface area (in square feet) that will be reclaimed	0.1
What is the estimated volume (in cubic yards) that will be reclaimed	0.1
What is the estimated surface area (in square feet) that will be remediated	0.1
What is the estimated volume (in cubic yards) that will be remediated	0.1
<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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**Santa Fe, NM 87505**

QUESTIONS, Page 4

Action 306592

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:	229137
	Action Number:	306592
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS****Remediation Plan (continued)**

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.

**This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:**

(Select all answers below that apply.)

(Ex Situ) Excavation and <b>off-site</b> disposal (i.e. dig and haul, hydrovac, etc.)	No
(Ex Situ) Excavation and <b>on-site</b> remediation (i.e. On-Site Land Farms)	No
(In Situ) Soil Vapor Extraction	No
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	No
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	No
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	No
Ground Water Abatement pursuant to 19.15.30 NMAC	No
OTHER (Non-listed remedial process)	Yes
Other Non-listed Remedial Process. Please specify	No remediation report was needed. Closure report

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 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: 01/23/2024
--	---

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

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QUESTIONS, Page 5  
  
Action 306592

**QUESTIONS (continued)**

Operator:  COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:  229137
	Action Number:  306592
	Action Type:  [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

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

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QUESTIONS, Page 6

Action 306592

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:	229137
	Action Number:	306592
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

Sampling Event Information	
Last sampling notification (C-141N) recorded	301509
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	10/24/2023
What was the (estimated) number of samples that were to be gathered	6
What was the sampling surface area in square feet	1325

**Remediation Closure Request**

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

Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No
All areas reasonably needed for production or subsequent drilling operations have been stabilized, returned to the sites existing grade, and have a soil cover that prevents ponding of water, minimizing dust and erosion	Yes
What was the total surface area (in square feet) remediated	0
What was the total volume (cubic yards) remediated	0
All areas not reasonably needed for production or subsequent drilling operations have been reclaimed to contain a minimum of four feet of non-waste contain earthen material with concentrations less than 600 mg/kg chlorides, 100 mg/kg TPH, 50 mg/kg BTEX, and 10 mg/kg Benzene	Yes
What was the total surface area (in square feet) reclaimed	0
What was the total volume (in cubic yards) reclaimed	0
Summarize any additional remediation activities not included by answers (above)	Excavation activities not necessary based on results of assessment sampling and NMSLO closure approval.

*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: 01/23/2024
--	---

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QUESTIONS, Page 7  
  
Action 306592

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 306592
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

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

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CONDITIONS  
  
Action 306592

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 306592
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
nvelez	None	4/8/2024

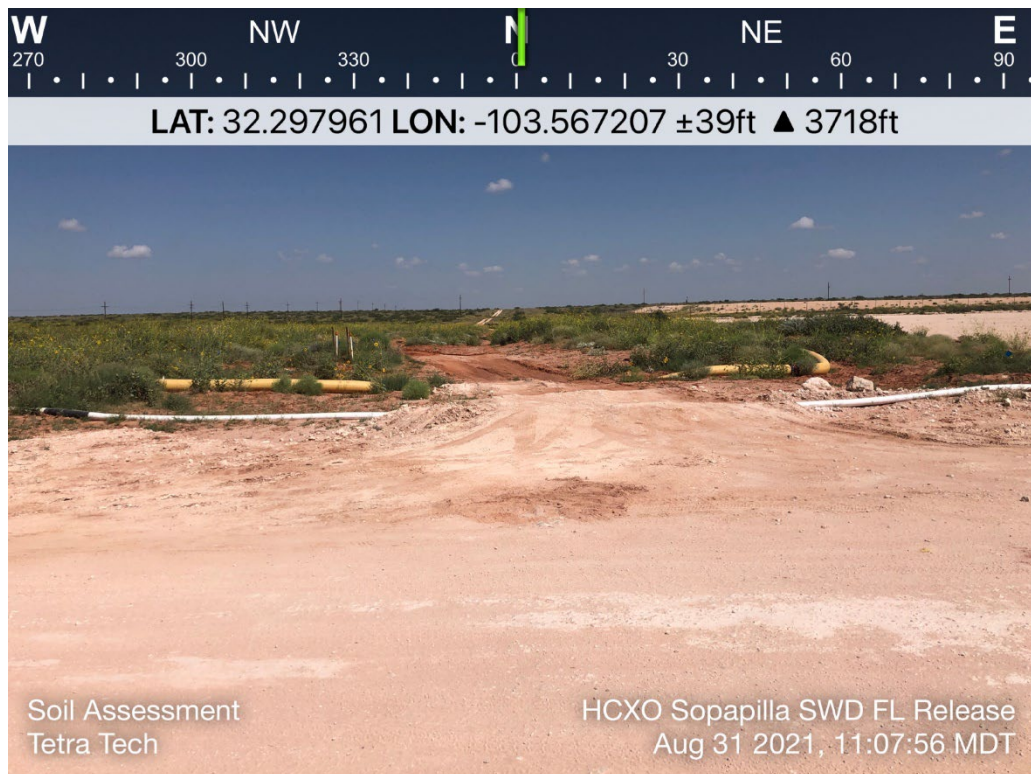


## **APPENDIX C**

# **Photographic Documentation**



TETRA TECH, INC. PROJECT NO. 212C-MD-02532A	DESCRIPTION	View northeast of the release area near the flowline running to the Sopapilla SWD. Partially buried surface polyline.	1
	SITE NAME	ConocoPhillips Sopapilla SWD Release	8/31/2021



TETRA TECH, INC. PROJECT NO. 212C-MD-02532A	DESCRIPTION	View north of the release area near the flowline running to the Sopapilla SWD. Partially buried surface polyline.	2
	SITE NAME	ConocoPhillips Sopapilla SWD Release	8/31/2021





TETRA TECH, INC. PROJECT NO. 212C-MD-02532A	DESCRIPTION	View of the release area near the flowline running to the Sopapilla SWD.	3
	SITE NAME	ConocoPhillips Sopapilla SWD Release	8/31/2021



TETRA TECH, INC. PROJECT NO. 212C-MD-02532A	DESCRIPTION	View of the release area near the flowline running to the Sopapilla SWD.	4
	SITE NAME	ConocoPhillips Sopapilla SWD Release	8/31/2021





TETRA TECH, INC. PROJECT NO. 212C-MD-02532A	DESCRIPTION	View of the release area near the flowline running to the Sopapilla SWD. Partially buried surface polyline.	5
	SITE NAME	ConocoPhillips Sopapilla SWD Release	8/31/2021



TETRA TECH, INC. PROJECT NO. 212C-MD-03252	DESCRIPTION	View west-northwest of approximate release area near the flowline running to the Sopapilla SWD. Lay flat lines and surface polyline.	6
	SITE NAME	Sopapilla State 2D CTB Flex Line Release	10/24/2023



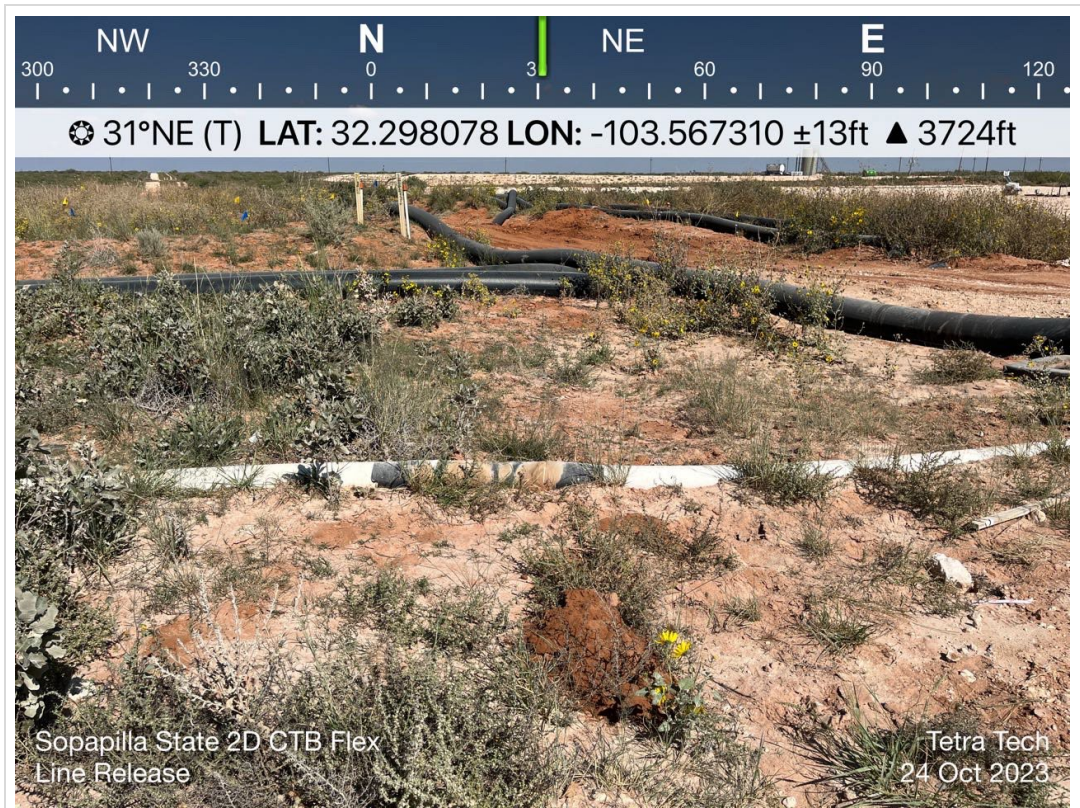


TETRA TECH, INC. PROJECT NO. 212C-MD-03252	DESCRIPTION	View west-northwest of hand auger locations in approximate release area near the flowline running to the Sopapilla SWD. Lay flat lines and surface polyline.	7
	SITE NAME	Sopapilla State 2D CTB Flex Line Release	10/24/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03252	DESCRIPTION	View north-northwest of approximate release area near the flowline running to the Sopapilla SWD. View of 2023 site assessment activities.	8
	SITE NAME	Sopapilla State 2D CTB Flex Line Release	10/24/2023





TETRA TECH, INC. PROJECT NO. 212C-MD-03252	DESCRIPTION	View north-northeast of approximate release area near the flowline running to the Sopapilla SWD. Mass of lay flat lines and repaired surface flowline.	9
	SITE NAME	Sopapilla State 2D CTB Flex Line Release	10/24/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03252	DESCRIPTION	View north-northeast of approximate release area near the flowline running to the Sopapilla SWD. View of repaired surface flow line.	10
	SITE NAME	Sopapilla State 2D CTB Flex Line Release	10/24/2023





TETRA TECH, INC. PROJECT NO. 212C-MD-03252	DESCRIPTION	View west of approximate release area near the flowline running to the Sopapilla SWD.	11
	SITE NAME	Sopapilla State 2D CTB Flex Line Release	10/24/2023

## **APPENDIX D**

### **Seed Mix**





United States  
Department of  
Agriculture

NRCS

Natural  
Resources  
Conservation  
Service

A product of the National  
Cooperative Soil Survey,  
a joint effort of the United  
States Department of  
Agriculture and other  
Federal agencies, State  
agencies including the  
Agricultural Experiment  
Stations, and local  
participants

# Custom Soil Resource Report for Lea County, New Mexico



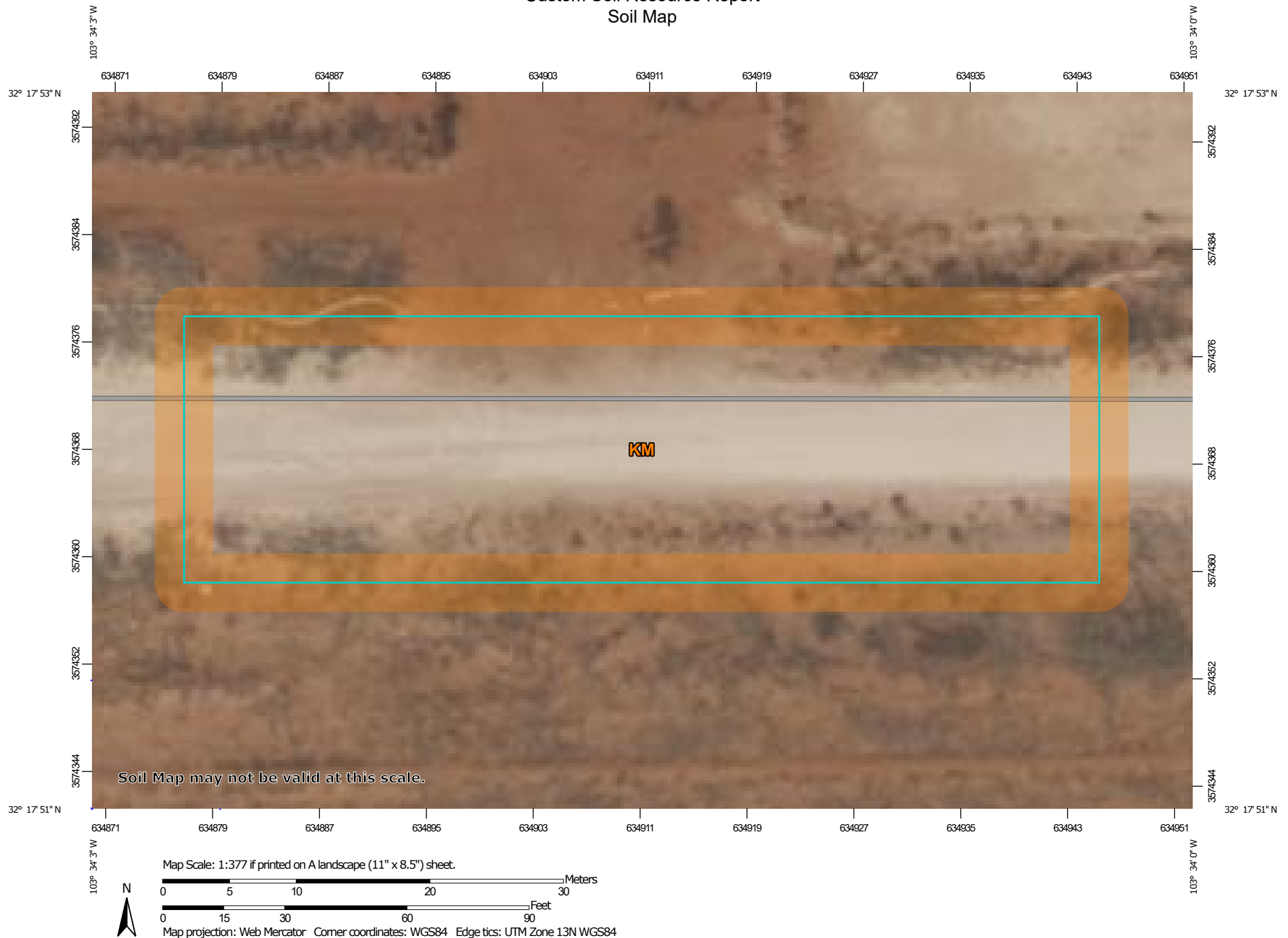
November 7, 2024

## Soil Map

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The soil map section includes the soil map for the defined area of interest, a list of soil map units on the map and extent of each map unit, and cartographic symbols displayed on the map. Also presented are various metadata about data used to produce the map, and a description of each soil map unit.


# Custom Soil Resource Report Soil Map




## Custom Soil Resource Report

## MAP LEGEND

## Area of Interest (AOI)

 Area of Interest (AOI)


## Soils


 Soil Map Unit Polygons


 Soil Map Unit Lines


 Soil Map Unit Points

## Special Point Features

 Blowout

 Borrow Pit


 Clay Spot

 Closed Depression

 Gravel Pit

 Gravelly Spot

 Landfill

 Lava Flow

 Marsh or swamp

 Mine or Quarry

 Miscellaneous Water

 Perennial Water

 Rock Outcrop


 Saline Spot

 Sandy Spot

 Severely Eroded Spot


 Sinkhole


 Slide or Slip


 Sodic Spot


 Spoil Area

 Stony Spot


 Very Stony Spot

 Wet Spot

 Other

 Special Line Features

## Water Features

 Streams and Canals


## Transportation

 Rails

 Interstate Highways

 US Routes

 Major Roads

 Local Roads

## Background

 Aerial Photography

## MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:20,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service  
Web Soil Survey URL:  
Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Lea County, New Mexico  
Survey Area Data: Version 21, Sep 3, 2024

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Feb 7, 2020—May 12, 2020

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

## Custom Soil Resource Report

## Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
KM	Kermit soils and Dune land, 0 to 12 percent slopes	0.3	100.0%
<b>Totals for Area of Interest</b>		<b>0.3</b>	<b>100.0%</b>

## Map Unit Descriptions

The map units delineated on the detailed soil maps in a soil survey represent the soils or miscellaneous areas in the survey area. The map unit descriptions, along with the maps, can be used to determine the composition and properties of a unit.

A map unit delineation on a soil map represents an area dominated by one or more major kinds of soil or miscellaneous areas. A map unit is identified and named according to the taxonomic classification of the dominant soils. Within a taxonomic class there are precisely defined limits for the properties of the soils. On the landscape, however, the soils are natural phenomena, and they have the characteristic variability of all natural phenomena. Thus, the range of some observed properties may extend beyond the limits defined for a taxonomic class. Areas of soils of a single taxonomic class rarely, if ever, can be mapped without including areas of other taxonomic classes. Consequently, every map unit is made up of the soils or miscellaneous areas for which it is named and some minor components that belong to taxonomic classes other than those of the major soils.

Most minor soils have properties similar to those of the dominant soil or soils in the map unit, and thus they do not affect use and management. These are called noncontrasting, or similar, components. They may or may not be mentioned in a particular map unit description. Other minor components, however, have properties and behavioral characteristics divergent enough to affect use or to require different management. These are called contrasting, or dissimilar, components. They generally are in small areas and could not be mapped separately because of the scale used. Some small areas of strongly contrasting soils or miscellaneous areas are identified by a special symbol on the maps. If included in the database for a given area, the contrasting minor components are identified in the map unit descriptions along with some characteristics of each. A few areas of minor components may not have been observed, and consequently they are not mentioned in the descriptions, especially where the pattern was so complex that it was impractical to make enough observations to identify all the soils and miscellaneous areas on the landscape.

The presence of minor components in a map unit in no way diminishes the usefulness or accuracy of the data. The objective of mapping is not to delineate pure taxonomic classes but rather to separate the landscape into landforms or landform segments that have similar use and management requirements. The delineation of such segments on the map provides sufficient information for the development of resource plans. If intensive use of small areas is planned, however, onsite investigation is needed to define and locate the soils and miscellaneous areas.

## Custom Soil Resource Report

An identifying symbol precedes the map unit name in the map unit descriptions. Each description includes general facts about the unit and gives important soil properties and qualities.

Soils that have profiles that are almost alike make up a *soil series*. Except for differences in texture of the surface layer, all the soils of a series have major horizons that are similar in composition, thickness, and arrangement.

Soils of one series can differ in texture of the surface layer, slope, stoniness, salinity, degree of erosion, and other characteristics that affect their use. On the basis of such differences, a soil series is divided into *soil phases*. Most of the areas shown on the detailed soil maps are phases of soil series. The name of a soil phase commonly indicates a feature that affects use or management. For example, Alpha silt loam, 0 to 2 percent slopes, is a phase of the Alpha series.

Some map units are made up of two or more major soils or miscellaneous areas. These map units are complexes, associations, or undifferentiated groups.

A *complex* consists of two or more soils or miscellaneous areas in such an intricate pattern or in such small areas that they cannot be shown separately on the maps. The pattern and proportion of the soils or miscellaneous areas are somewhat similar in all areas. Alpha-Beta complex, 0 to 6 percent slopes, is an example.

An *association* is made up of two or more geographically associated soils or miscellaneous areas that are shown as one unit on the maps. Because of present or anticipated uses of the map units in the survey area, it was not considered practical or necessary to map the soils or miscellaneous areas separately. The pattern and relative proportion of the soils or miscellaneous areas are somewhat similar. Alpha-Beta association, 0 to 2 percent slopes, is an example.

An *undifferentiated group* is made up of two or more soils or miscellaneous areas that could be mapped individually but are mapped as one unit because similar interpretations can be made for use and management. The pattern and proportion of the soils or miscellaneous areas in a mapped area are not uniform. An area can be made up of only one of the major soils or miscellaneous areas, or it can be made up of all of them. Alpha and Beta soils, 0 to 2 percent slopes, is an example.

Some surveys include *miscellaneous areas*. Such areas have little or no soil material and support little or no vegetation. Rock outcrop is an example.



## Custom Soil Resource Report

## Lea County, New Mexico

## KM—Kermit soils and Dune land, 0 to 12 percent slopes

## Map Unit Setting

*National map unit symbol:* dmpx  
*Elevation:* 3,000 to 4,400 feet  
*Mean annual precipitation:* 10 to 15 inches  
*Mean annual air temperature:* 60 to 62 degrees F  
*Frost-free period:* 190 to 205 days  
*Farmland classification:* Not prime farmland

## Map Unit Composition

*Kermit and similar soils:* 46 percent  
*Dune land:* 44 percent  
*Minor components:* 10 percent  
*Estimates are based on observations, descriptions, and transects of the mapunit.*

## Description of Kermit

## Setting

*Landform:* Dunes  
*Landform position (two-dimensional):* Shoulder, backslope, footslope  
*Landform position (three-dimensional):* Side slope  
*Down-slope shape:* Concave, convex, linear  
*Across-slope shape:* Convex  
*Parent material:* Calcareous sandy eolian deposits derived from sedimentary rock

## Typical profile

*A - 0 to 8 inches:* fine sand  
*C - 8 to 60 inches:* fine sand

## Properties and qualities

*Slope:* 5 to 12 percent  
*Depth to restrictive feature:* More than 80 inches  
*Drainage class:* Excessively drained  
*Runoff class:* Very low  
*Capacity of the most limiting layer to transmit water (Ksat):* Very high (20.00 in/hr)  
*Depth to water table:* More than 80 inches  
*Frequency of flooding:* None  
*Frequency of ponding:* None  
*Calcium carbonate, maximum content:* 3 percent  
*Gypsum, maximum content:* 1 percent  
*Maximum salinity:* Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)  
*Sodium adsorption ratio, maximum:* 2.0  
*Available water supply, 0 to 60 inches:* Low (about 3.1 inches)

## Interpretive groups

*Land capability classification (irrigated):* None specified  
*Land capability classification (nonirrigated):* 7e  
*Hydrologic Soil Group:* A  
*Ecological site:* R070BC022NM - Sandhills  
*Hydric soil rating:* No

## Custom Soil Resource Report

**Description of Dune Land****Setting**

*Landform:* Dunes

*Landform position (two-dimensional):* Shoulder, backslope, footslope

*Landform position (three-dimensional):* Side slope

*Down-slope shape:* Concave, convex, linear

*Across-slope shape:* Convex

*Parent material:* Sandy eolian deposits derived from sedimentary rock

**Typical profile**

*A - 0 to 6 inches:* fine sand

*C - 6 to 60 inches:* fine sand

**Interpretive groups**

*Land capability classification (irrigated):* None specified

*Land capability classification (nonirrigated):* 8

*Hydrologic Soil Group:* A

*Hydric soil rating:* No

**Minor Components****Palomas**

*Percent of map unit:* 3 percent

*Ecological site:* R070BD003NM - Loamy Sand

*Hydric soil rating:* No

**Pyote**

*Percent of map unit:* 3 percent

*Ecological site:* R070BD003NM - Loamy Sand

*Hydric soil rating:* No

**Wink**

*Percent of map unit:* 2 percent

*Ecological site:* R070BD003NM - Loamy Sand

*Hydric soil rating:* No

**Maljamar**

*Percent of map unit:* 2 percent

*Ecological site:* R070BD003NM - Loamy Sand

*Hydric soil rating:* No

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## Custom Soil Resource Report

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# SLO Seed Mix

# SM Series

## 1 REVEGETATION PLANS

The following Revegetation Plans were developed for revegetation of sites in southeastern New Mexico. To determine which revegetation plan is appropriate follow procedures in the section titled Determining the Revegetation Plan.

Revegetation Plans contain seed mixtures, as well as seed bed preparation and planting requirements. The detailed instructions for seedbed preparation and planting can be found in the section Revegetation Techniques.

**Table 3 - Revegetation Plans, Codes, and Soil Types for Southeastern New Mexico**

REVEGETATION PLANS	CODE	SOIL TEXTURES
<b>Clay</b>	C	Clay, Silty Clay, Stony Silty Clay, Clay Loam, Silty Clay Loam (including saline and sodic Clay soils)
<b>Loam</b>	L	Silty Loam, Cobbly Silt Loam, Stony Silt Loam, Silt, Loam, Sandy, Clay Loam
<b>Sandy Loam</b>	SL	Very Fine Sandy Loam, Fine Sandy Loam, Cobbly Fine Sandy Loam, Sandy Loam, Cobbly Sandy Loam, Gravelly Fine Sandy Loam, Very Gravelly Fine Sand Loam, Stony Fine Sandy Loam, Stony Sandy Loam
<b>Shallow</b>	SH	Rocky Loam, Cobbly Loam
<b>Course</b>	CS	Gravelly Loam, very Gravelly Loam, Gravelly Sandy Loam, Very Gravelly Sandy Loam, Stony Loam, Stony Sandy Loam
<b>Sandy</b>	S	Loamy Fine Sand, Loam Sand, Very Gravelly Loamy Fine Sand
<b>Blow Sand</b>	BS	Fine Sand, Sand, Coarse Sand
<b>Mountain Meadow</b>	MM	Clay, Loam
<b>Mountain Upland</b>	MU	Clay Loam, Loam



**NMSLO Seed Mix****Sandy (S)****SANDY (S) SITES SEED MIXTURE:**

COMMON NAME	VARIETY	APPLICATION RATE (PLS/Acre)	DRILL BOX
<b>Grasses:</b>			
Sand bluestem	Elida, VNS, So.	2.0	F
Little bluestem	Cimarron, Pastura	3.0	F
Black grama	VNS, Southern	1.0	D
Sand dropseed	VNS, Southern	4.0	S
Plains bristlegrass	VNS, Southern	2.0	D
<b>Forbs:</b>			
Firewheel (Gaillardia)	VNS, Southern	1.0	D
Annual Sunflower	VNS, Southern	1.0	D
<b>Shrubs:</b>			
Fourwing Saltbush	VNS, Southern	1.0	F
<b>Total PLS/acre</b>		<b>16.0</b>	

S = Small seed drill box, D = Standard seed drill box, F = Fluffy seed drill box  
VNS = Variety Not Stated, PLS = Pure Live Seed

- Seed mixes should be provided in bags separating seed types into the three categories: small (S), standard (D) and fluffy (F).
- VNS, Southern – Seed should be from a southern latitude collection of this species.
- Double seed application rate for broadcast or hydroseeding.
- If one species is not available, contact the SLO for an approved substitute; alternatively the SLO may require other species proportionately increased.
- Additional information on these seed species can be found on the USDA Plants Database website at <http://plants.usda.gov>.





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QUESTIONS

Action 419057

**QUESTIONS**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 419057
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

**QUESTIONS**

Prerequisites	
Incident ID (n#)	nAPP2115525504
Incident Name	NAPP2115525504 SOPAPILLA STATE 2D CTB @ 0
Incident Type	Produced Water Release
Incident Status	Reclamation Report Received

Location of Release Source	
<i>Please answer all the questions in this group.</i>	
Site Name	SOPAPILLA STATE 2D CTB
Date Release Discovered	05/25/2021
Surface Owner	State

Incident Details	
<i>Please answer all the questions in this group.</i>	
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	
<i>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.</i>	
Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Corrosion   Flow Line - Production   Produced Water   Released: 10 BBL   Recovered: 0 BBL   Lost: 10 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	No
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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Action 419057

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 419057
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

**QUESTIONS**

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

**Initial Response**

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

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

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

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

I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 01/23/2024
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Action 419057

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 419057
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

**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	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
<b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>	
A continuously flowing watercourse or any other significant watercourse	Greater than 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 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	Greater than 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	None
A 100-year floodplain	Greater than 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	Yes

**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	No

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

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

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

On what estimated date will the remediation commence	01/24/2024
On what date will (or did) the final sampling or liner inspection occur	01/24/2024
On what date will (or was) the remediation complete(d)	01/24/2024
What is the estimated surface area (in square feet) that will be reclaimed	0.1
What is the estimated volume (in cubic yards) that will be reclaimed	0.1
What is the estimated surface area (in square feet) that will be remediated	0.1
What is the estimated volume (in cubic yards) that will be remediated	0.1

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

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

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Action 419057

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 419057
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

**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>	
(Ex Situ) Excavation and <b>off-site</b> disposal (i.e. dig and haul, hydrovac, etc.)	No
(Ex Situ) Excavation and <b>on-site</b> remediation (i.e. On-Site Land Farms)	No
(In Situ) Soil Vapor Extraction	No
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	No
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	No
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	No
Ground Water Abatement pursuant to 19.15.30 NMAC	No
OTHER (Non-listed remedial process)	Yes
Other Non-listed Remedial Process. Please specify	No remediation report was needed. Closure report
<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: 01/23/2024
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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Action 419057

QUESTIONS (continued)

Operator:  COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:  229137
	Action Number:  419057
	Action Type:  [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

QUESTIONS

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

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Action 419057

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 419057
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

**QUESTIONS**

Sampling Event Information	
Last sampling notification (C-141N) recorded	301509
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	10/24/2023
What was the (estimated) number of samples that were to be gathered	6
What was the sampling surface area in square feet	1325

Remediation Closure Request	
<i>Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.</i>	
Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No
All areas reasonably needed for production or subsequent drilling operations have been stabilized, returned to the sites existing grade, and have a soil cover that prevents ponding of water, minimizing dust and erosion	Yes
What was the total surface area (in square feet) remediated	0
What was the total volume (cubic yards) remediated	0
All areas not reasonably needed for production or subsequent drilling operations have been reclaimed to contain a minimum of four feet of non-waste contain earthen material with concentrations less than 600 mg/kg chlorides, 100 mg/kg TPH, 50 mg/kg BTEX, and 10 mg/kg Benzene	Yes
What was the total surface area (in square feet) reclaimed	0
What was the total volume (in cubic yards) reclaimed	0
Summarize any additional remediation activities not included by answers (above)	Excavation activities not necessary based on results of assessment sampling and NMSLO closure approval.
<i>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>	
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: 01/23/2024

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Action 419057

**QUESTIONS (continued)**

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 419057
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

**QUESTIONS**

<b>Reclamation Report</b>	
<i>Only answer the questions in this group if all reclamation steps have been completed.</i>	
Requesting a reclamation approval with this submission	Yes
What was the total reclamation surface area (in square feet) for this site	0
What was the total volume of replacement material (in cubic yards) for this site	0
<i>Per Paragraph (1) of Subsection D of 19.15.29.13 NMAC the reclamation must contain a minimum of four feet of non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, or other test methods approved by the division. The soil cover must include a top layer, which is either the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater.</i>	
Is the soil top layer complete and is it suitable material to establish vegetation	Yes
On what (estimated) date will (or was) the reseedling commence(d)	01/01/2030
Summarize any additional reclamation activities not included by answers (above)	Excavation activities not necessary based on results of assessment sampling and NMSLO closure approval. The release is in an active road.
<i>The responsible party must attach information demonstrating they have complied with all applicable reclamation requirements and any conditions or directives of the OCD. This demonstration should be in the form of attachments (in .pdf format) including a scaled site map, any proposed reseedling plans or relevant field notes, photographs of reclaimed area, and a narrative of the reclamation activities. Refer to 19.15.29.13 NMAC.</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. 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: 01/09/2025



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, Page 8

Action 419057

QUESTIONS (continued)

Operator:  COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:  229137
	Action Number:  419057
	Action Type:  [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

QUESTIONS

<b>Revegetation Report</b>	
<i>Only answer the questions in this group if all surface restoration, reclamation and re-vegetation obligations have been satisfied.</i>	
Requesting a restoration complete approval with this submission	No
<i>Per Paragraph (4) of Subsection (D) of 19.15.29.13 NMAC for any major or minor release containing liquids, the responsible party must notify the division when reclamation and re-vegetation are complete.</i>	

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CONDITIONS

Action 419057

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 419057
	Action Type: [C-141] Reclamation Report C-141 (C-141-v-Reclamation)

CONDITIONS

Created By	Condition	Condition Date
nvez	None	4/7/2025