



March 28, 2025

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

**Re: Release Characterization and Remediation Work Plan
ConocoPhillips
Columbus Fee 23H Flowline Release
Unit Letter B, Section 34, Township 25 South, Range 33 East
Lea County, New Mexico
Incident ID# nAPP2500736394**

Sir or Madam:

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips Company (ConocoPhillips) to assess a release at the Columbus Fee #23H CTB (facility fAB1909251433). The release footprint is located in Public Land Survey System (PLSS) Unit Letter B, Section 34, Township 25 South, and Range 33 East, in Lea County, New Mexico (Site). The approximate release point occurred at coordinates 32.0923754, -103.5566964 as shown on Figures 1 and 2.

BACKGROUND

According to the C-141 Initial Report, the release was discovered on December 30, 2024, and was caused by a hole in the flowline due to corrosion. Approximately 1 barrels (bbls) of crude oil and 13 bbls of produced water were reported released of which 1 bbl of crude oil and 1 bbl of produced water recovered. The release occurred behind the tank battery near production lines, in an on-pad area. The NMOCD approved the initial C-141 on January 7, 2025, and subsequently assigned the release the Incident ID NAPP2500736394. The initial C-141 form is included in Appendix A.

LAND OWNERSHIP

According to the NMOCD Oil and Gas Map, the site is located on private land. Concurrence with the landowner will be obtained prior to remedial activities.

SITE CHARACTERIZATION

A site characterization was performed and no sinkholes, residences, schools, hospitals, institutions, churches, stream bodies, springs, playa lakes, wetlands, incorporated municipal boundaries, subsurface mines, or floodplains are located within the distances specified in 19.15.29 New Mexico Administrative Code (NMAC). The Site is in an area of low karst potential.

According to the New Mexico Office of the State Engineer (NMOSE) reporting system, there is one well nearly ½-mile (800-meter) radius of the Site, located approximately 0.57 miles (925.1 meters) northeast of the release point. Additionally, there is a windmill located approximately 0.5 miles northeast of the site. In a separate ConocoPhillips incident (nAPP2409554213), this windmill location was used for groundwater determination. A 2024 Remediation Summary and Soil Deferral Request Report was submitted for incident

Tetra Tech

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nAPP240955421 which was approved on February 5, 2025. In this report it was stated that the windmill was inspected, and a static water level measurement was collected which measured at a depth of 135 feet below ground surface (bgs). The site characterization data is included in Appendix B.

REGULATORY FRAMEWORK

Based upon the release footprint and in accordance with Subsection E of 19.15.29.12 NMAC, per 19.15.29.11 NMAC, the site characterization data was used to determine recommended remedial action levels (RRALs) for benzene, toluene, ethylbenzene, and xylene (collectively referred to as BTEX), total petroleum hydrocarbons (TPH), and chlorides in soil.

Based on the site characterization and in accordance with Table I of 19.15.29.12 NMAC, the RRALs for the Site are as follows:

Constituent	Site RRALs
Chloride	20,000 mg/kg
TPH (GRO+DRO+ORO)	2,500 mg/kg
TPH (GRO+DRO)	1,000 mg/kg
BTEX	50 mg/kg
Benzene	10 mg/kg

SITE ASSESSMENT

On January 15, 2025, Tetra Tech was onsite to conduct assessment activities on behalf of ConocoPhillips. Assessment activities included installing four (4) hand auger borings (AH-1 through AH-4) in the release area footprint to a total depth ranging from 3-3.5 feet bgs. Auger refusal was met at roughly between 3 and 3.5 feet bgs. Four (4) hand auger borings (AH-5 through AH-8) were installed along the perimeter of the release extent to 1-foot bgs.

Due to the dense subsurface lithology (caprock) beneath the footprint, vertical delineation was not achieved with the hand auger borings. Tetra Tech remobilized to the site on February 13, 2025, and installed two (2) trenches (T-1 and T-2) using a mini excavator to evaluate the vertical extents of the release footprint. Trench T-1 was installed to 4.5 feet bgs and T-2 was installed to 5 feet bgs. Assessment sampling locations are presented in Figure 3. Photographic documentation of the Site is included in Appendix C.

A total of twenty-four (24) soil samples were sent to Cardinal Laboratories in Hobbs, New Mexico to be analyzed for chloride via Standard Method 4500Cl-B, TPH via EPA Method 8015M, and BTEX via EPA Method 8021B. A copy of the laboratory analytical reports and chain-of-custody documentation are included in Appendix D.

SUMMARY OF RESULTS

The laboratory analytical results from the January 2025 and February 2025 assessment sampling activities are summarized in Table 1. Analytical results associated with at AH-2 and AH-3 as well as T-1 and T-2 exceeded the Site RRALs for TPH (2,500 mg/kg). Analytical results associated with AH-2 and T-2 exceeded the Site RRALs for BTEX (50 mg/kg). The upper interval for AH-3 (0-1') also exceeded for BTEX. Additionally, analytical results associated with AH-1 and T-1 at 0-1' exceeded the Site RRAL for GRO+DRO (1,000 mg/kg).

The release area footprint is in on-pad area within an active production facility with production lines, in both the subsurface and at the surface. Horizontal delineation of the release was achieved as a result of the January 2025 assessment activities. As mentioned, trenching was required at the release site, based on the subsurface lithology. During the remobilization on February 2025, vertical delineation of TPH impacts

were not fully achieved at sample location T-2. Trenching deeper than the 5' bgs interval at T-2 was not feasible based on safety concerns associated with the pressurized lines and equipment accessibility. Given the subsurface lithology, additional excavation was not possible without larger, heavier equipment, and the site conditions presented with restrictions.

As TPH and BTEX concentrations at the basal T-2 depth interval (4'-5') exceeded the most stringent RRAL of 100 mg/kg and 50 mg/kg and limitations faced in the field during the additional assessment, vertical delineation was not fully achieved in the area of T-2. The area of T-1 was vertically delineated for TPH to the most stringent RRALs. Chloride concentrations at T-1 were below site specific RRALs. To properly mitigate safety hazards at the Site, vertical delineation will be achieved during the remedial activities proposed below.

REMEDIATION WORK PLAN

Based on the collected analytical results, ConocoPhillips proposes to remove the impacted material as shown in Figure 4. The release footprint in the area of AH-1 and T-1 will be excavated to an approximate depth of 1.5 feet below the surrounding surface or until a representative sample from the walls and bottom of the excavation are below the site RRALs. In the area of AH-2 and T-2 the release footprint will be excavated to an approximate depth of 7 feet below the surrounding surface or until a representative sample from the walls and bottom of the excavation are below the site RRALs.

During the proposed remedial activities, T-2 will be vertically delineated through floor confirmation sampling and fully remediated to Site RRALs. The release footprint in the area of AH-3 and AH-4 will be excavated to a maximum depth of 4 feet below the surrounding surface or until a representative sample from the walls and bottom of the excavation is below the site RRALs. The excavation will be conducted using heavy equipment (backhoes, hoe rams, and track hoes) as permitted; however, areas in close proximity to steel surface/pressurized lines or other production equipment will be hand-dug to the maximum extent practicable and heavy equipment will come no more than 4 feet from any pressurized lines.

Excavated soils will be transported offsite and disposed of at an NMOCD-approved or permitted facility. The responsible party will notify the OCD two (2) business days prior to conducting final confirmation sampling pursuant to 19.15.29.12.D(1)(a) NMAC, using a Notification of Sampling (C-141N) application.

Confirmation bottom and sidewall samples representative of no more than 200 square feet will be collected for verification of remedial activities, and analyzed for TPH, BTEX, and chlorides as shown in Figure 5. Once results are received, the excavation will then be backfilled with clean material to surface grade. The estimated volume of material to be remediated is approximately 103 cubic yards and an area of approximately 528 square feet.

SITE RECLAMATION

This release is within an active pad area; therefore, reclamation (reseeding) activities are not proposed within this work plan, as the release area is within an area of multiple subsurface lines. However, once acceptable confirmation sample results are received, the excavation will be backfilled with clean material that is non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg, as analyzed by EPA Method 300.0 or Method 4500.

Release Characterization and Remediation Work Plan
March 28, 2025

ConocoPhillips

CONCLUSION

Based on the results of the 2025 release assessment and characterization, ConocoPhillips will remediate soils within the release extent impacted with BTEX and TPH above Site RRALs. The proposed remediation activities will be conducted within 90 days of acceptance of the proposed plan. If you have any questions concerning the assessment activities for the Site or the proposed remediation work plan, please call me at (512) 596-8201 or Christian at (512) 338-2861.

Sincerely,
Tetra Tech, Inc.



Lisbeth Chavira
Project Manager



Christian M. Llull, P.G.
Program Manager

cc:
Mr. Jacob Laird, GPBU – ConocoPhillips

LIST OF ATTACHMENTS

Figures:

- Figure 1 – Overview Map
- Figure 2 – Topographic Map
- Figure 3 – Approximate Release Extent and Site Assessment
- Figure 4 – Proposed Remediation Extent
- Figure 5 – Alternative Confirmation Sampling Plan

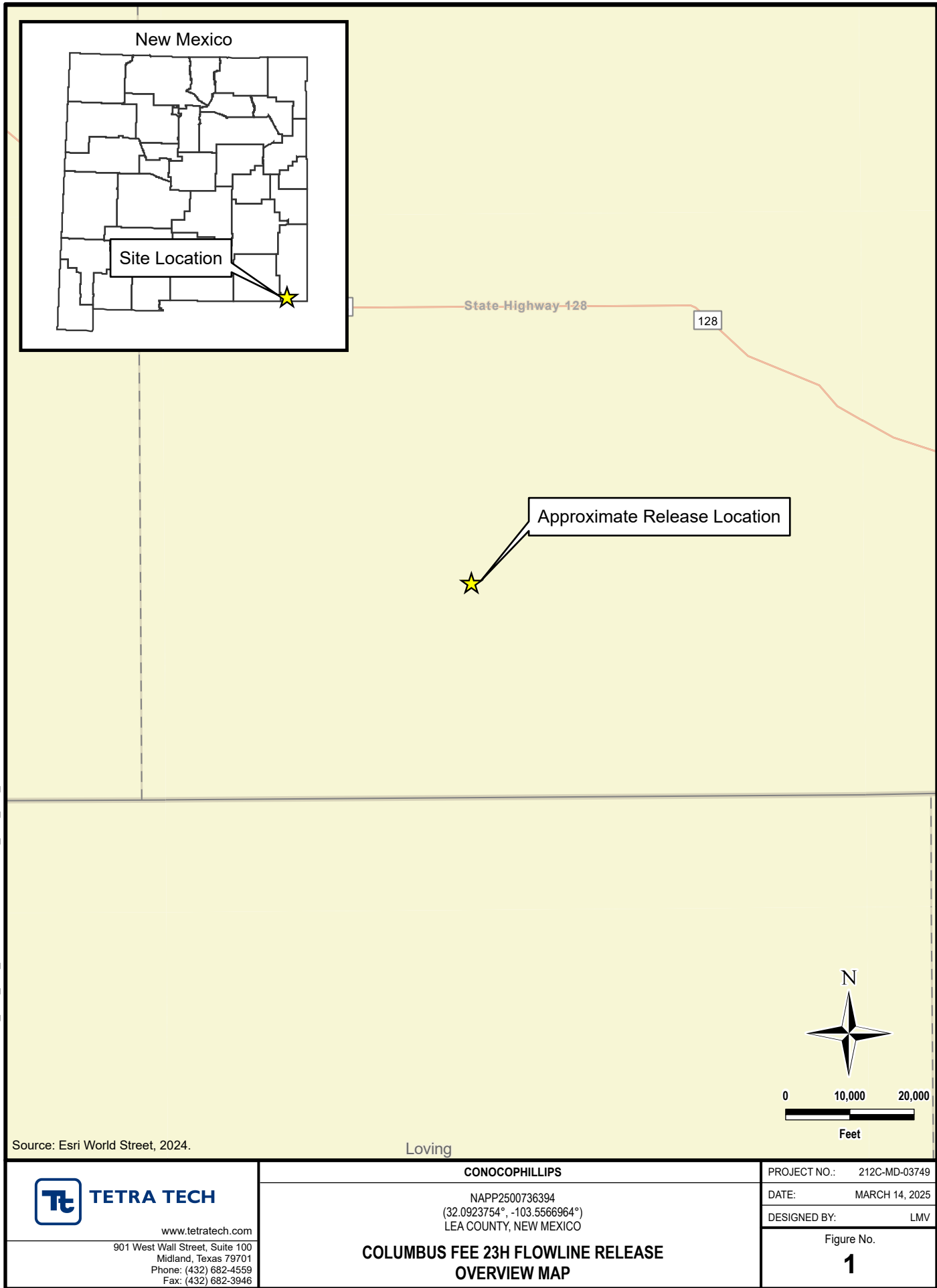
Tables:

- Table 1 – Summary of Analytical Results – 2025 Soil Assessment

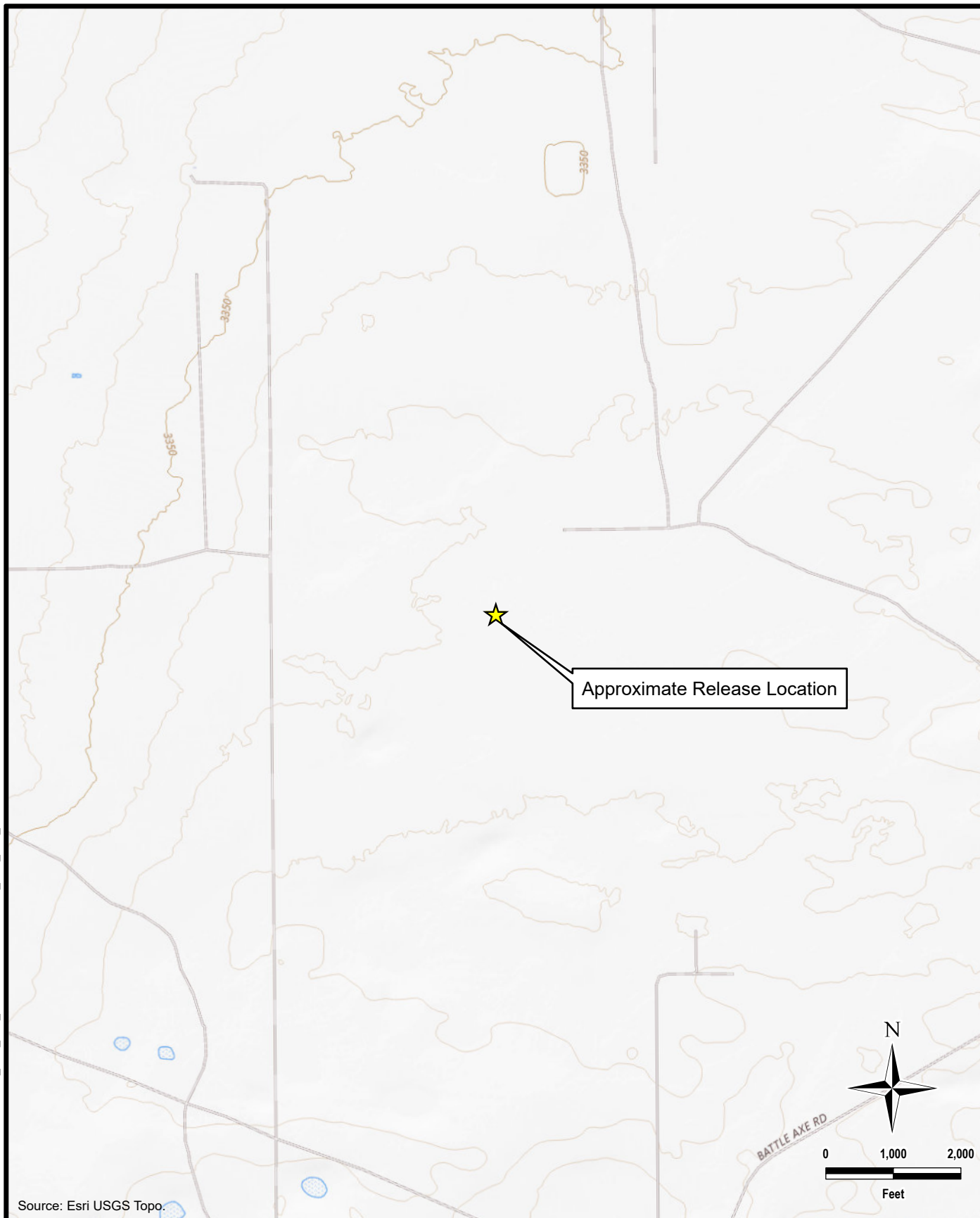
Appendices:

- Appendix A – C-141 Forms
- Appendix B – Site Characterization Data
- Appendix C – Photographic Documentation
- Appendix D – Laboratory Analytical Data

FIGURES



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TETRA TECH

www.tetrattech.com

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

CONOCOPHILLIPS

NAPP2500736394
(32.0923754°, -103.5566964°)
LEA COUNTY, NEW MEXICO

**COLUMBUS FEE 23H FLOWLINE RELEASE
TOPOGRAPHIC MAP**

PROJECT NO.: 212C-MD-0

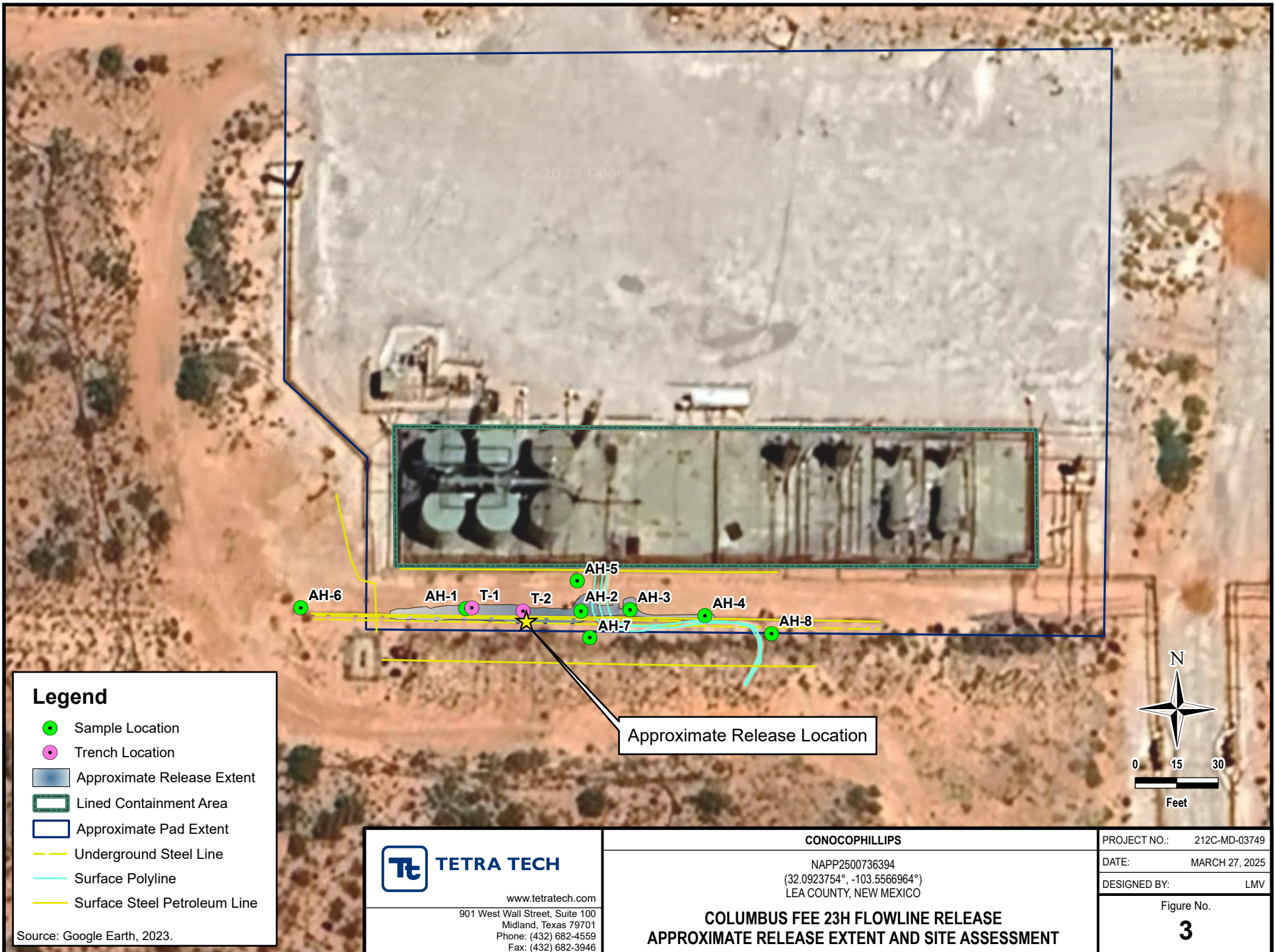
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DESIGNED BY: LMV

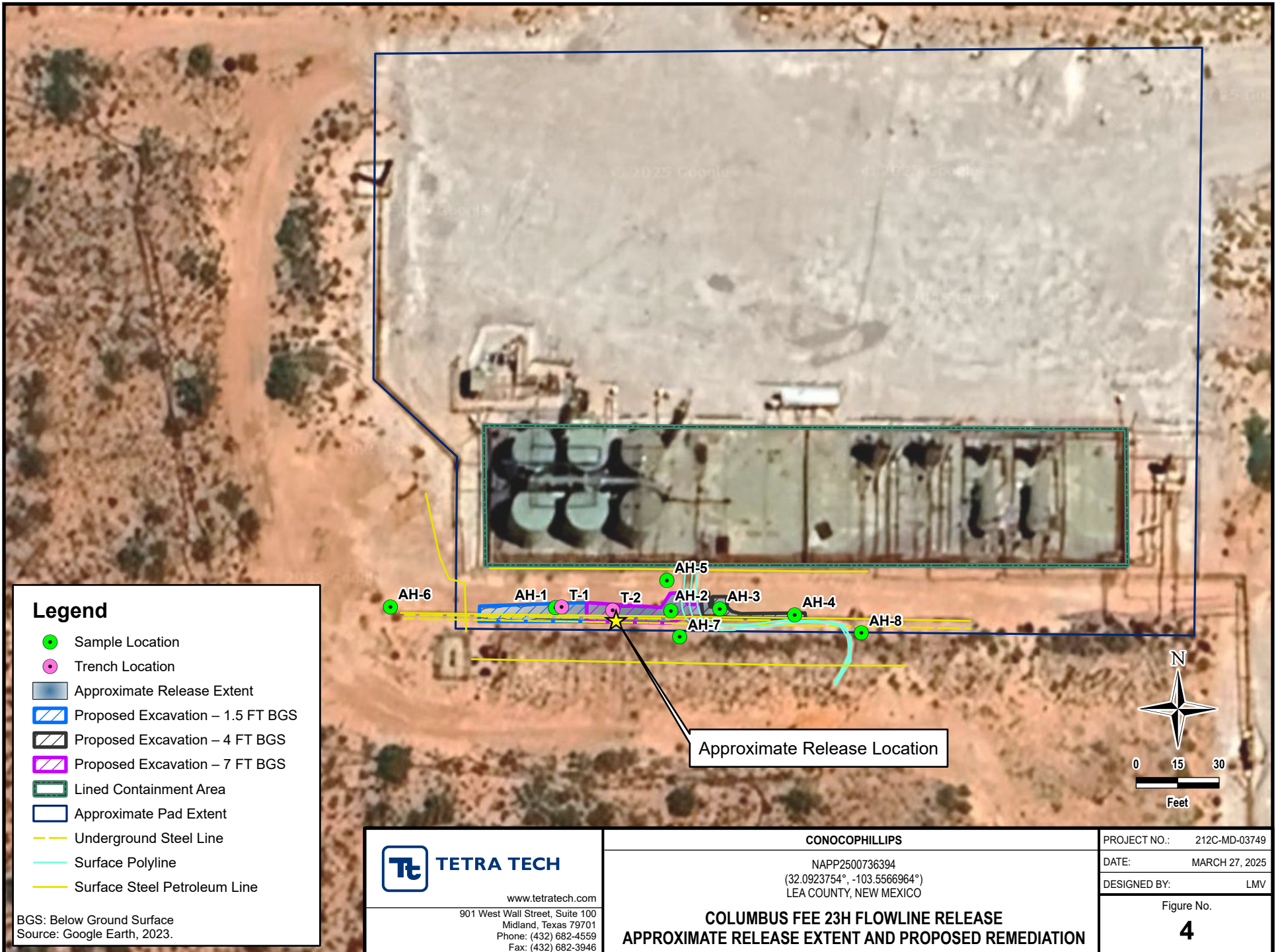
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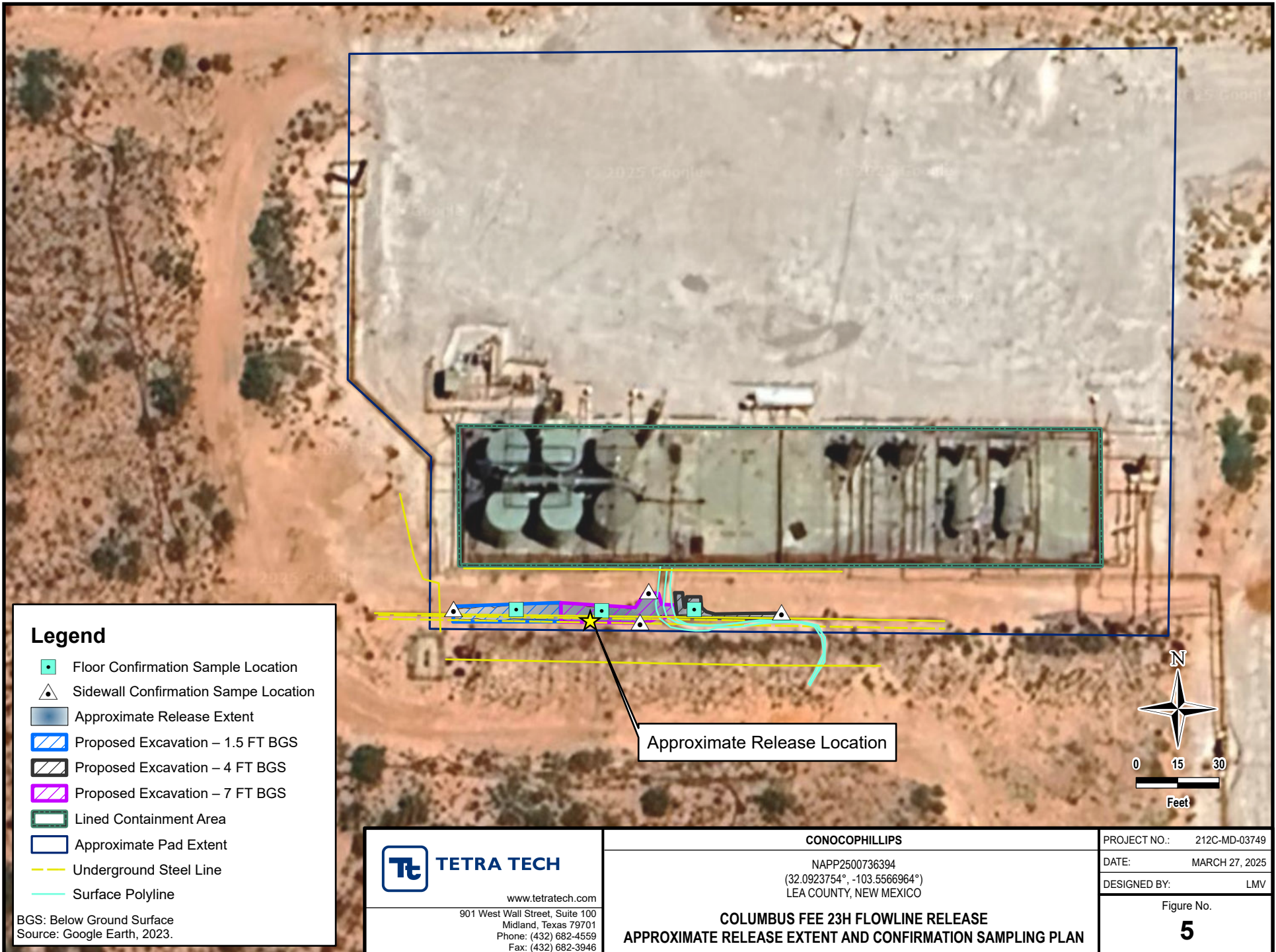
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TABLES

TABLE 1
SUMMARY OF ANALYTICAL RESULTS
SOIL ASSESSMENT- nAPP2500736394
CONOCOPHILLIPS
COLUMBUS FEE 23H FLOWLINE RELEASE
LEA COUNTY, NM

19.15.29.12 NMAC Closure Criteria for Soils Impacted by a Release (>100 ft):			Chlorides ¹		BTEX ²										TPH ³									
			< 20,000 mg/kg		< 10 mg/kg		Toluene		Ethylbenzene		Total Xylenes		< 50 mg/kg		GRO		DRO		EXT DRO		< 2,500 mg/kg		1,000 mg/kg	
Sample ID	Sample Date	Sample Depth Interval	Chloride		Benzene										C ₆ - C ₁₀		> C ₁₀ - C ₂₈		> C ₂₈ - C ₃₆		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	Q	
AH-1	1/15/2025	0-1	7,920		0.312	S-04	4.15	S-04	5.70	C-NC1, S-	18.6	S-04	28.8	C-NC1, S-	431		1,480		149		2,060		1,911	
		2-3	8,000		<0.050		0.063		0.312	GC-NC1	0.283		0.658	GC-NC1	<10.0		114		<10.0		114		114	
		3-3.5	6,800		<0.050		0.208		0.434	GC-NC1	0.797		1.44	GC-NC1	<10.0		85.6		<10.0		85.6		85.6	
AH-2	1/15/2025	0-1	5,700		7.15		63.3		53.5	GC-NC1	235		359	GC-NC1	8,520		21,800		2,820		33,140		30,320	
		2-3	6,800		4.39		51.4		42.4	GC-NC1	183		281	GC-NC1	5,880		13,200		1,750		20,830		19,080	
		3-3.5	6,600		3.99	QM-07	43	QM-07	15.2	NC1, QM	140	QM-07	202	GC-NC1	4,210		9,550		926		14,686		13,760	
AH-3	1/15/2025	0-1	4,500		1.28		32.5		15	GC-NC1	147		196	GC-NC1	4,430		11,900		1,540		17,870		16,330	
		2-3	5,800		<0.050		1.79		1.13	GC-NC1	11.4		14.4	GC-NC1	489		1,770		216		2,475		2,259	
		3-3.5	5,600		<0.050		1.38		0.983	GC-NC1	10.3		12.6	GC-NC1	512	QM-07	1,680	QM-07	246		2,438		2,192	
AH-4	1/15/2025	0-1	160		<0.050		<0.050		<0.050		0.291		<0.300		12.2		109		10.8		132		121.2	
		2-3	352		<0.050		<0.050		<0.050		0.461		0.461		11		78.5		<10.0		89.5		89.5	
		3-3.5	208		<0.050		0.444		0.461	GC-NC1	5.71		6.62	GC-NC1	231		920		131		1,282		1,151	
AH-5	1/15/2025	0-1	64		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-		-	
AH-6	1/15/2025	0-1	16		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-		-	
AH-7	1/15/2025	0-1	64		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-		-	
AH-8	1/15/2025	0-1	48		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-		-	
T-1	2/13/2025	0-1	6,000		0.219		3.68		1.73		17.6		23.2		791		2,880		399		4,070		3,671	
		2-3	8,000		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-		-	
		3-4	2,120		<0.050		<0.050		<0.050		<0.150		<0.300		14.7		355		59.8		429.5		369.7	
		4-4.5	1,570		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-		-	
T-2	2/13/2025	0-1	560		13.9		152		43.5		405		615		12,200		21,900		3,320		37,420		34,100	
		2-3	2,350		8.74		70.7		16.7		158		254		6,750		10,000		1,450		18,200		16,750	
		3-4	5,200		30.4		193		44.3		395		663		18,100		26,400		3,690		48,190		44,500	
		4-5	4,660		8.54		86.7		23.7		220		339		9,830		18,400		2,660		30,890		28,230	

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 5M4500CI-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.

QUALIFIERS:

S-04 The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
GC-NC1 8260 confirmation analysis was performed; initial GC results were not supported by GC/MS analysis and are biased high with interfering compounds.

APPENDIX A C-141 Forms

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

General Information
Phone: (505) 629-6116

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

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

QUESTIONS

Action 417834

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 417834
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2500736394
Incident Name	NAPP2500736394 COLUMBUS FEE 023H @ 0
Incident Type	Release Other
Incident Status	Initial C-141 Received
Incident Facility	[fAB1909251433] COLUMBUS FEE #23H CTB

Location of Release Source	
Please answer all the questions in this group.	
Site Name	Columbus Fee 023H
Date Release Discovered	12/30/2024
Surface Owner	Private

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

Nature and Volume of Release	
Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.	
Crude Oil Released (bbls) Details	Cause: Corrosion Flow Line - Production Crude Oil Released: 1 BBL Recovered: 1 BBL Lost: 0 BBL.
Produced Water Released (bbls) Details	Cause: Corrosion Flow Line - Production Produced Water Released: 13 BBL Recovered: 1 BBL Lost: 12 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.

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QUESTIONS, Page 2

Action 417834

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 417834
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	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: 01/07/2025
--	---

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QUESTIONS, Page 3

Action 417834

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 417834
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Site Characterization	
<i>Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Not answered.
What method was used to determine the depth to ground water	Not answered.
Did this release impact groundwater or surface water	Not answered.
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Not answered.
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Not answered.
An occupied permanent residence, school, hospital, institution, or church	Not answered.
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Not answered.
Any other fresh water well or spring	Not answered.
Incorporated municipal boundaries or a defined municipal fresh water well field	Not answered.
A wetland	Not answered.
A subsurface mine	Not answered.
An (non-karst) unstable area	Not answered.
Categorize the risk of this well / site being in a karst geology	Not answered.
A 100-year floodplain	Not answered.
Did the release impact areas not on an exploration, development, production, or storage site	Not answered.

Remediation Plan	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
Requesting a remediation plan approval with this submission	No
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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CONDITIONS

Action 417834

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 417834
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

CONDITIONS

Created By	Condition	Condition Date
rhamlet	None	1/7/2025

Incident ID	
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization

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

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

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

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

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

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

State of New Mexico
Oil Conservation Division

Page 4

Incident ID	
District RP	
Facility ID	
Application ID	

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

Printed Name: _____ Title: _____

Signature: Jacob Laird Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

Incident ID	
District RP	
Facility ID	
Application ID	

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: _____ Title: _____

Signature: Jacob Laird Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

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

Signature: _____ Date: _____

APPENDIX B

Site Characterization Data


OCD Land Ownership



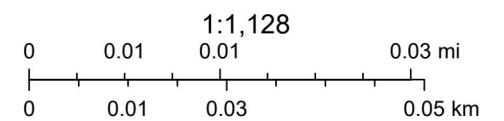
3/21/2025, 8:30:43 AM

Mineral Ownership

Land Ownership

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

P




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

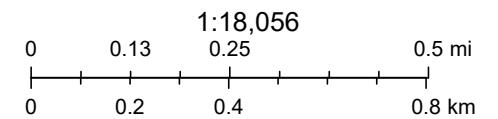
OCD Karst Potential



3/21/2025, 8:39:48 AM

Karst Occurrence Potential

	Low
	Medium



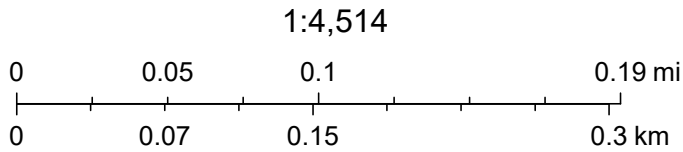
BLM, OCD, New Mexico Tech, Esri, HERE, Garmin, iPC, Maxar

OCD Well Location



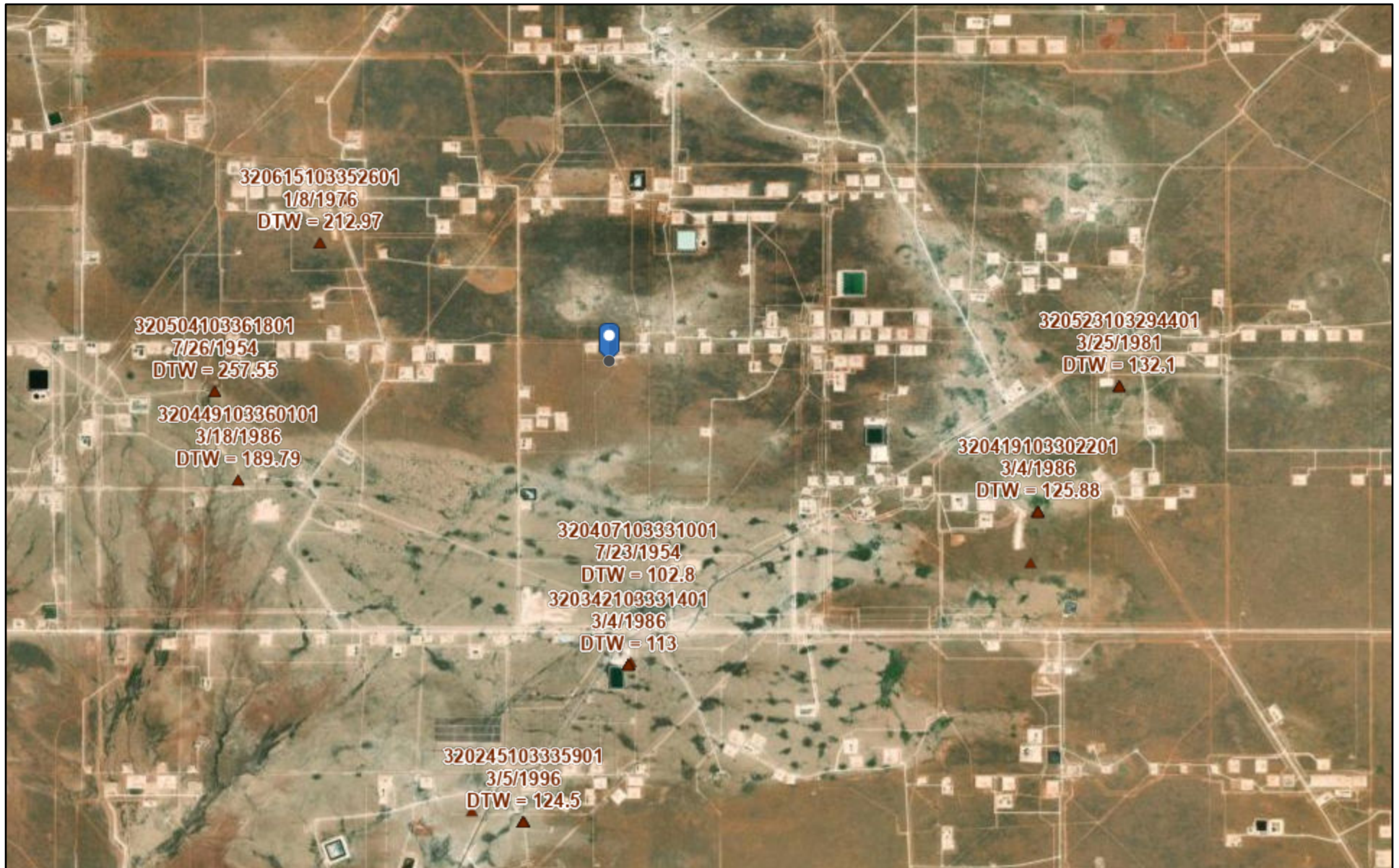
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● OSE Water PODs



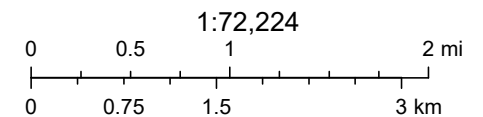
USGS, Esri, HERE, Garmin, IPC, Maxar

USGS Wells



3/21/2025, 8:44:22 AM

▲ USGS Historical GW Wells



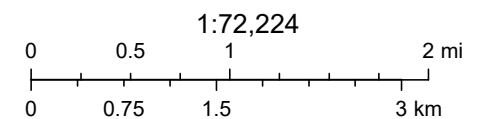
Esri, HERE, Garmin, Earthstar Geographics, USGS

OCD Water Bodys



3/21/2025, 8:37:27 AM

— OSE Streams



Esri, HERE, Garmin, Earthstar Geographics, NM OSE



National Wetlands Inventory



March 21, 2025

Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

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

- Lake
- Other
- Riverine

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

National Flood Hazard Layer FIRMette



103°33'43"W 32°5'48"N



1:6,000

103°33'5"W 32°5'17"N

Legend

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

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



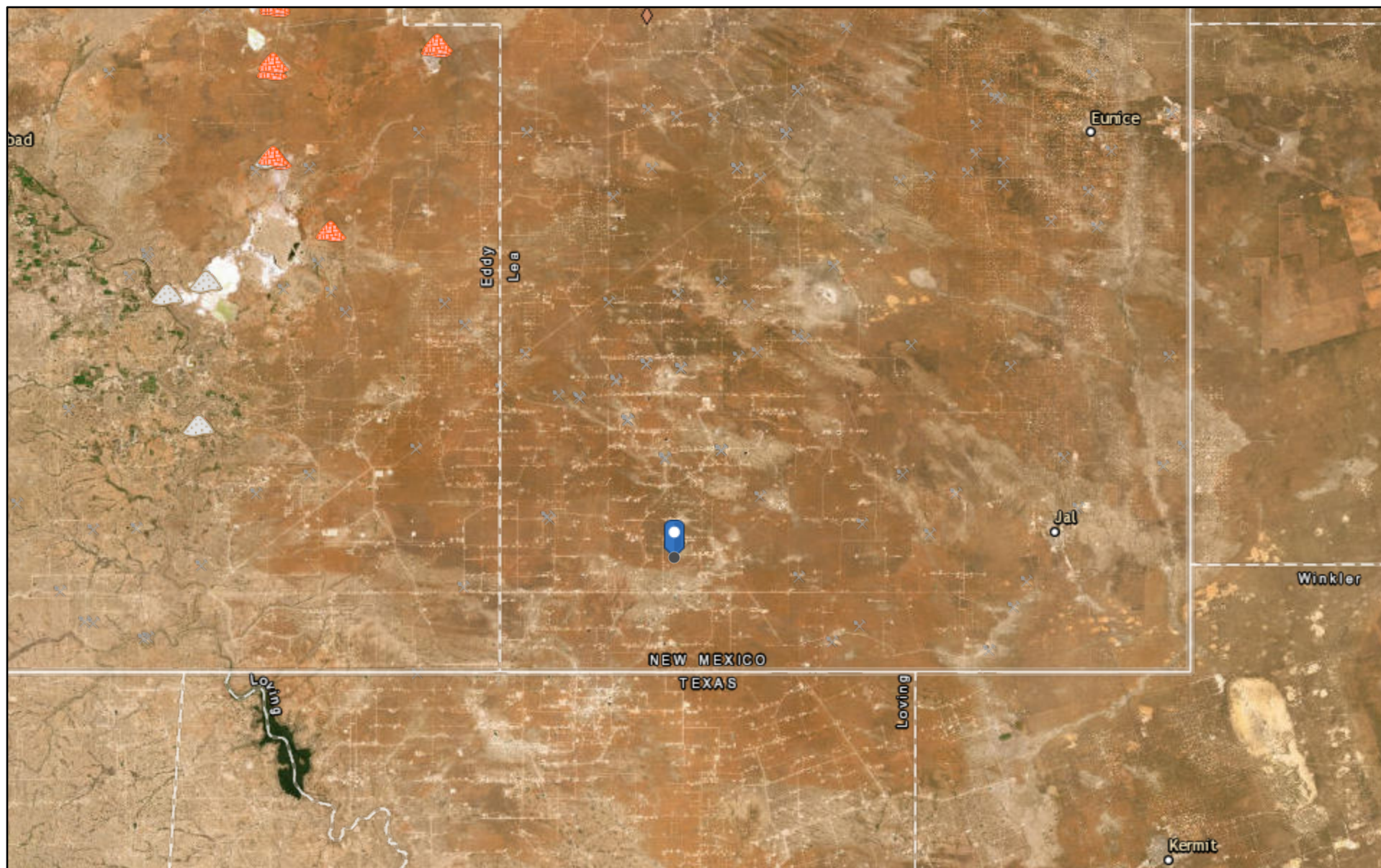
The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

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

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 3/21/2025 at 1:48 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

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

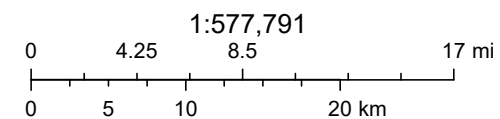
Active Mines in New Mexico



3/21/2025, 8:46:45 AM

Registered Mines

- | | | | |
|---|-----------------------|---|-----------------------------|
| × | Aggregate, Stone etc. |  | Potash |
| × | Aggregate, Stone etc. |  | Salt |
| × | Aggregate, Stone etc. |  | Industrial Minerals (Other) |

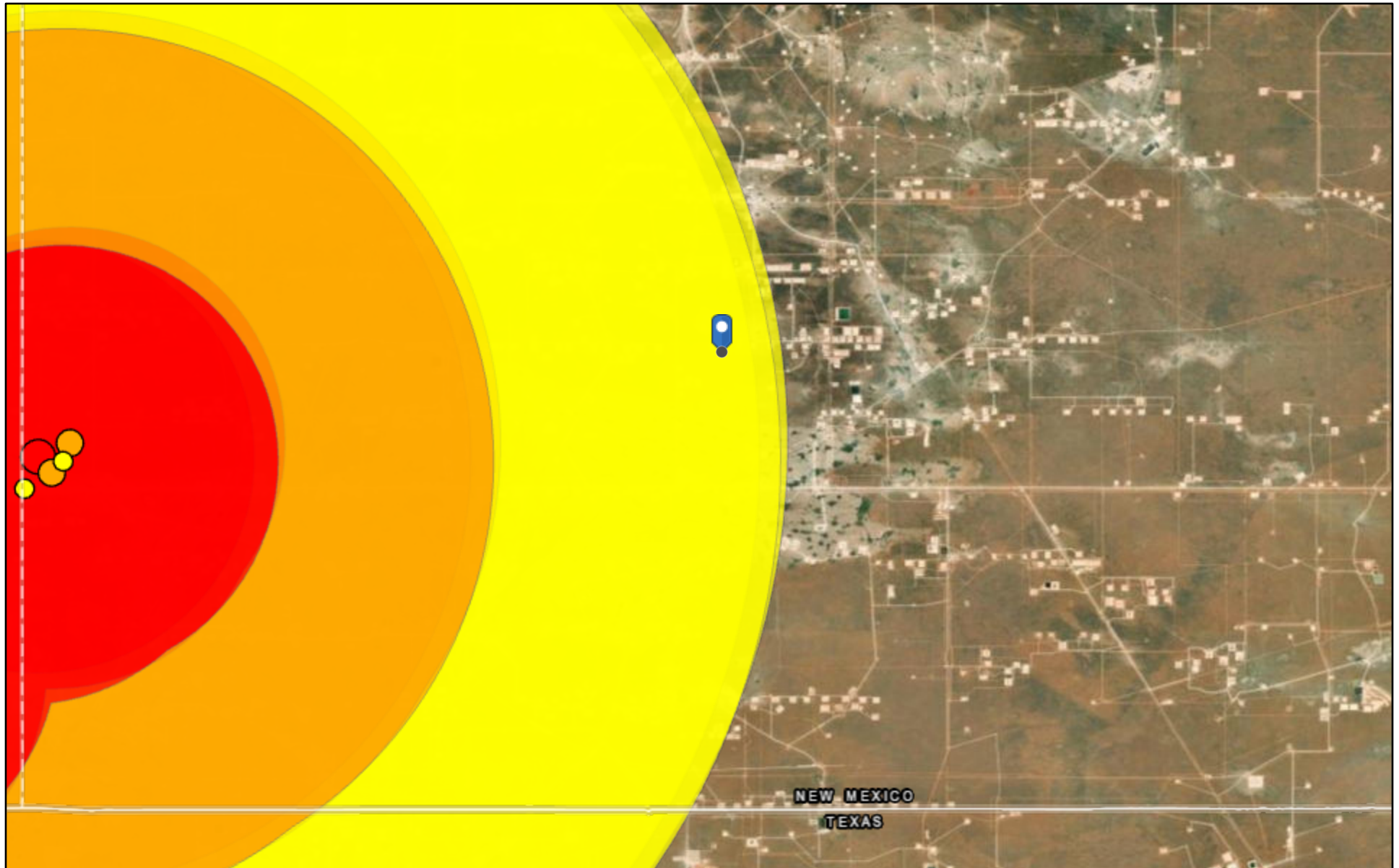


Esri, HERE, Garmin, Earthstar Geographics

EMNRD MMD GIS Coordinator

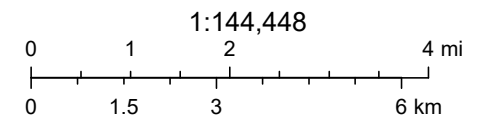
NM Energy, Minerals and Natural Resources Department (<http://nm-emnrd.maps.arcgis.com/apps/webappviewer/index.html?id=1b5e577974664d689b47790897ca2795>)

OCD Induced Seismicity



3/21/2025, 8:42:29 AM

Seismic Response 3.5 and above Seismic Response 2.5 to 2.9 Seismic Response 3.0 to 3.4 M2.5+ Earthquakes (2021+)



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

New Mexico Oil Conservation Division

APPENDIX C

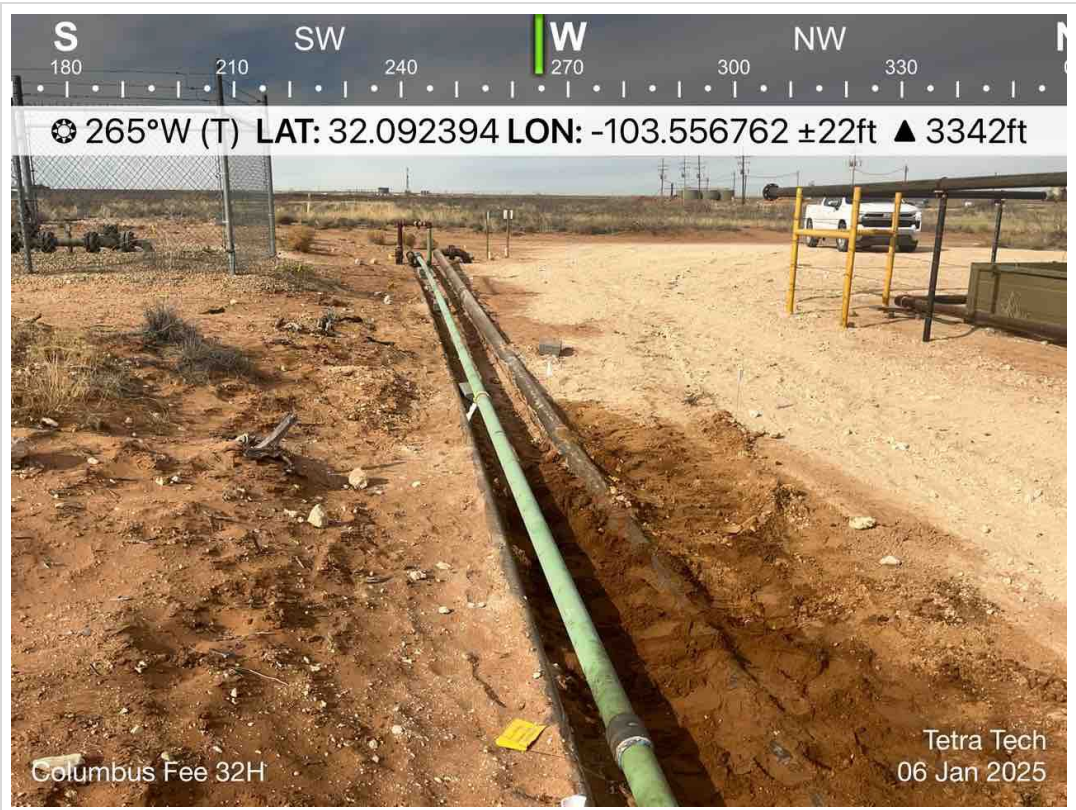
Photographic Documentation



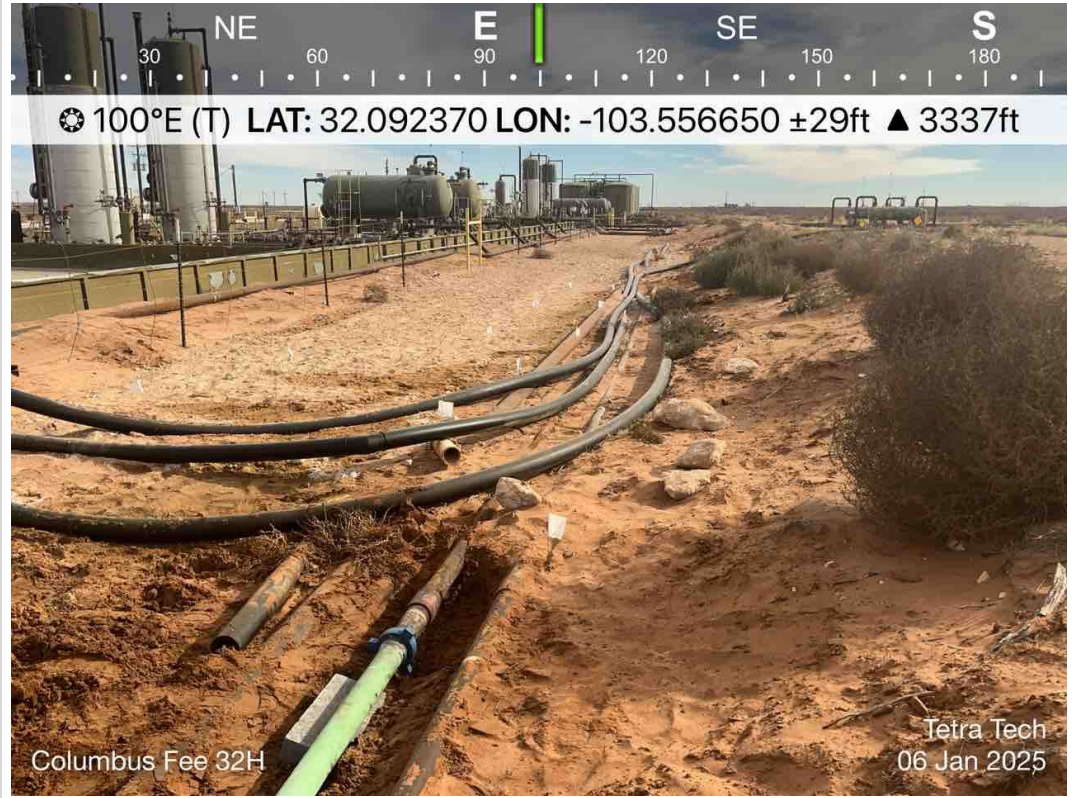
TETRA TECH, INC. PROJECT NO. 212C-MD-03749	DESCRIPTION	View South. Columbus Fee CTB sign on pad	1
	SITE NAME	Columbus Fee CTB	01/06/2025



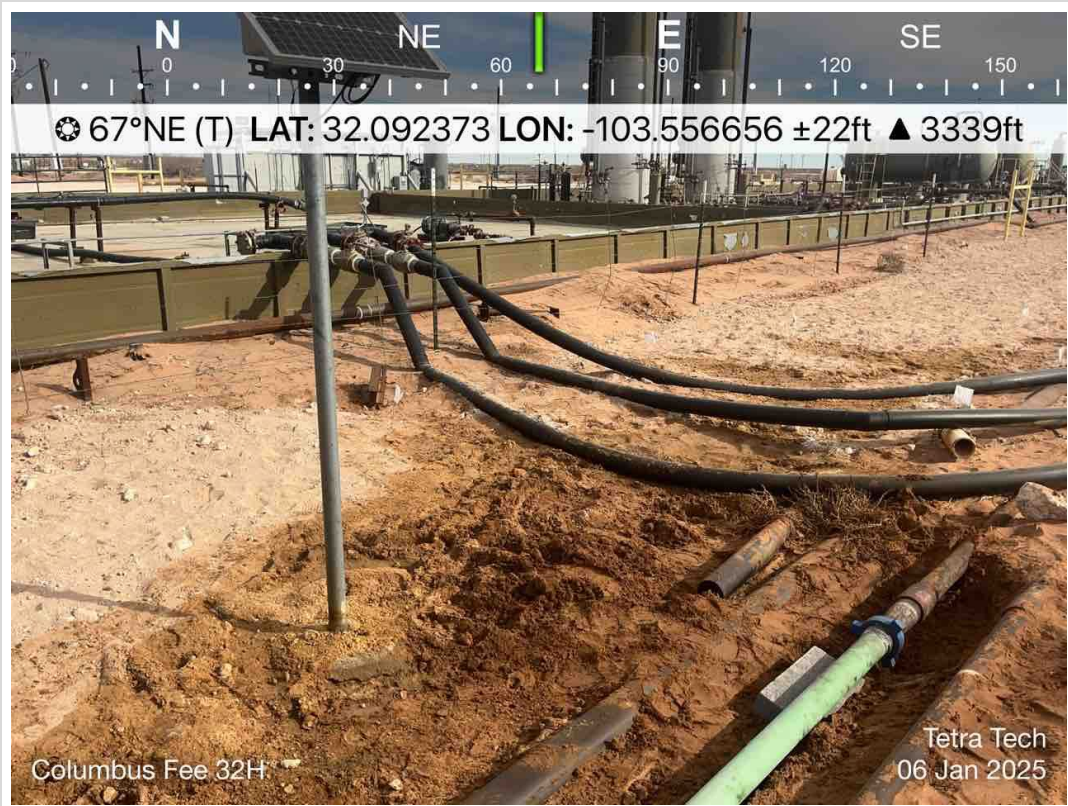
TETRA TECH, INC. PROJECT NO. 212C-MD-03749	DESCRIPTION	View east. View of the release extent. View of surface steel lines.	2
	SITE NAME	Columbus Fee CTB	01/06/2025



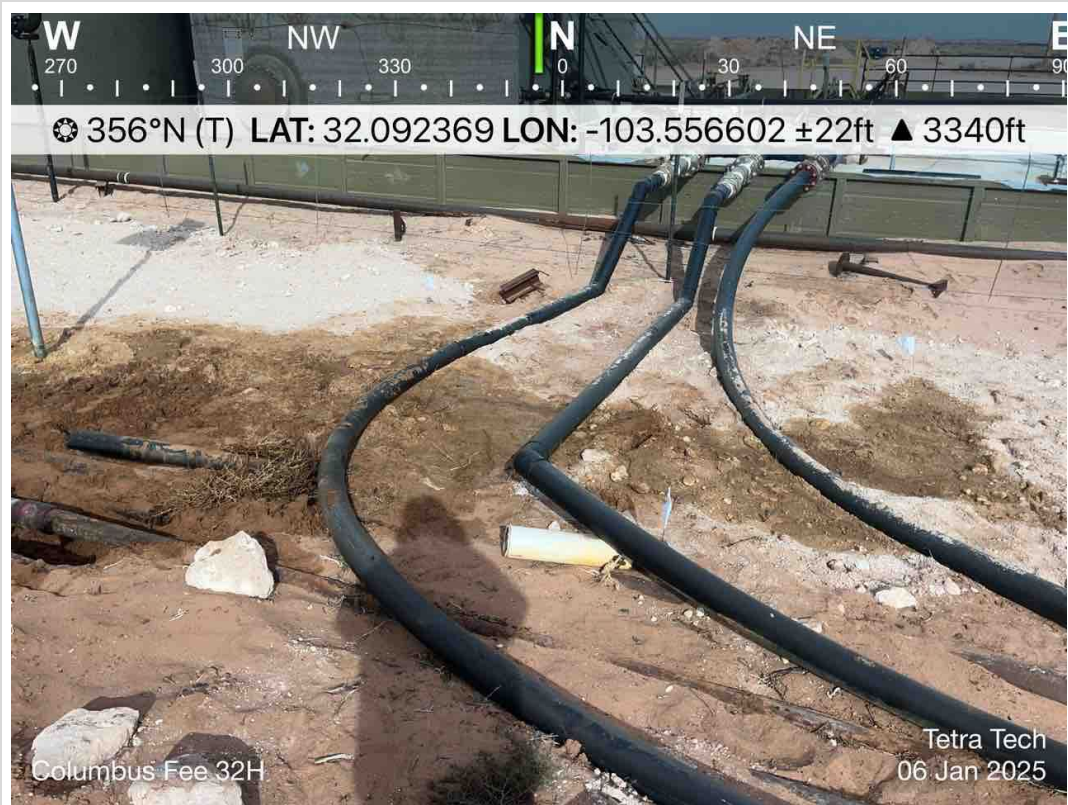
TETRA TECH, INC. PROJECT NO. 212C-MD-03749	DESCRIPTION	View west. View of the release extent. View of surface steel lines.	3
	SITE NAME	Columbus Fee CTB	01/06/2025



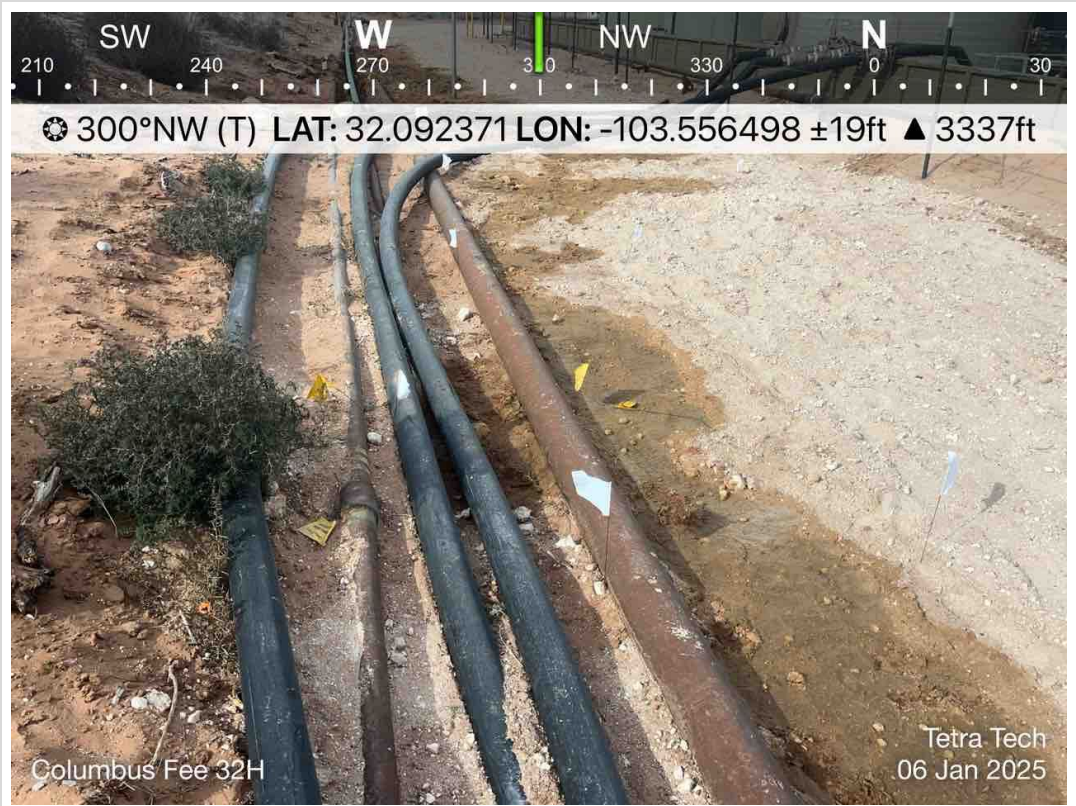
TETRA TECH, INC. PROJECT NO. 212C-MD-03749	DESCRIPTION	View east. View of the release extent. View of surface steel lines.	4
	SITE NAME	Columbus Fee CTB	01/06/2025



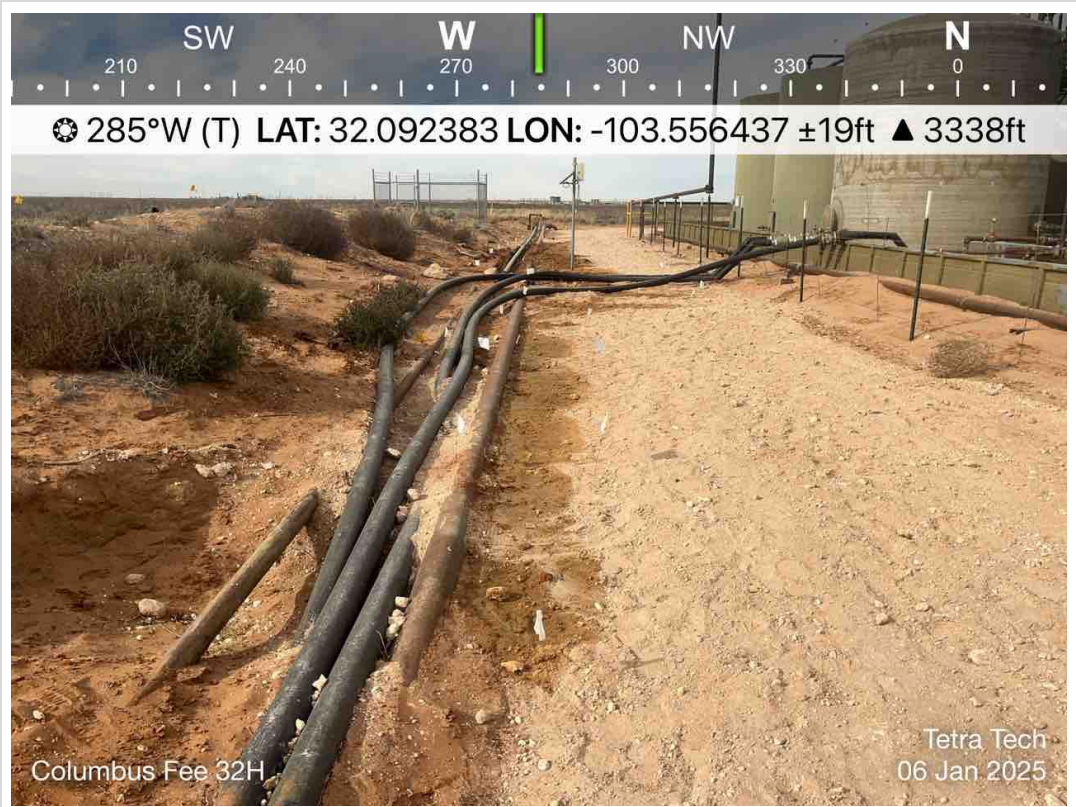
TETRA TECH, INC. PROJECT NO. 212C-MD-03749	DESCRIPTION	View east. View of the release extent. View of surface steel lines and surface polylines from facility.	5
	SITE NAME	Columbus Fee CTB	01/06/2025



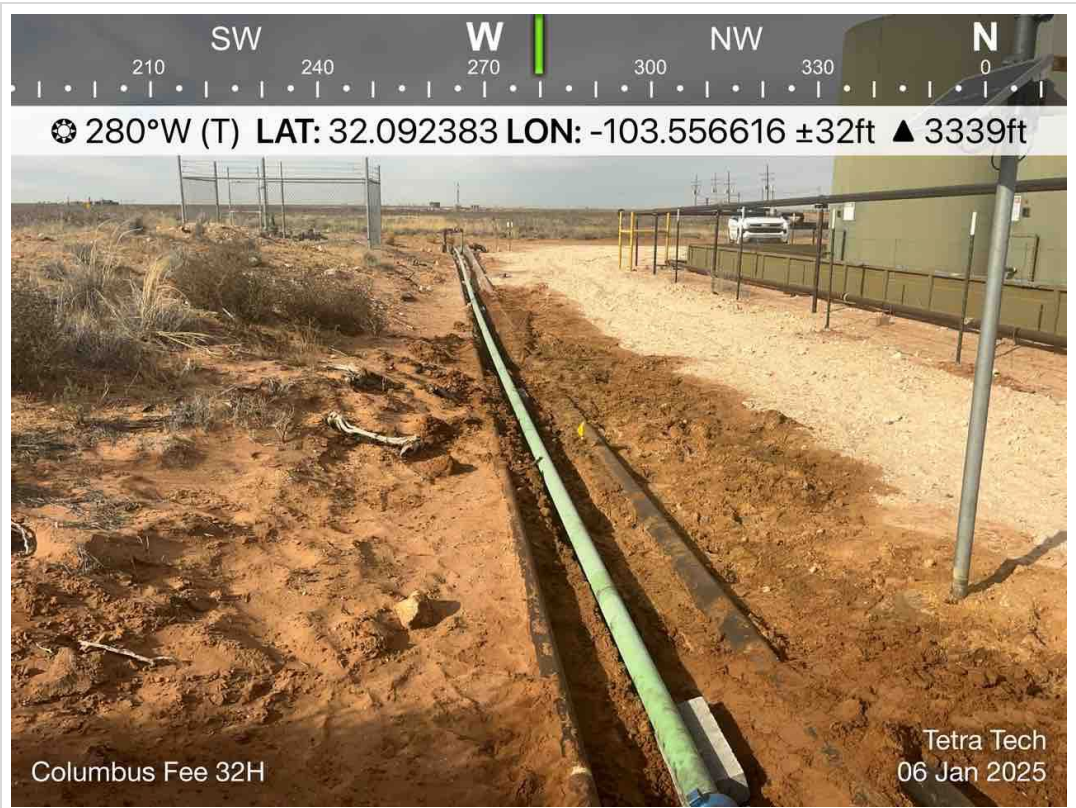
TETRA TECH, INC. PROJECT NO. 212C-MD-03749	DESCRIPTION	View North. View of surface steel and polylines. View of facility.	6
	SITE NAME	Columbus Fee CTB	01/06/2025



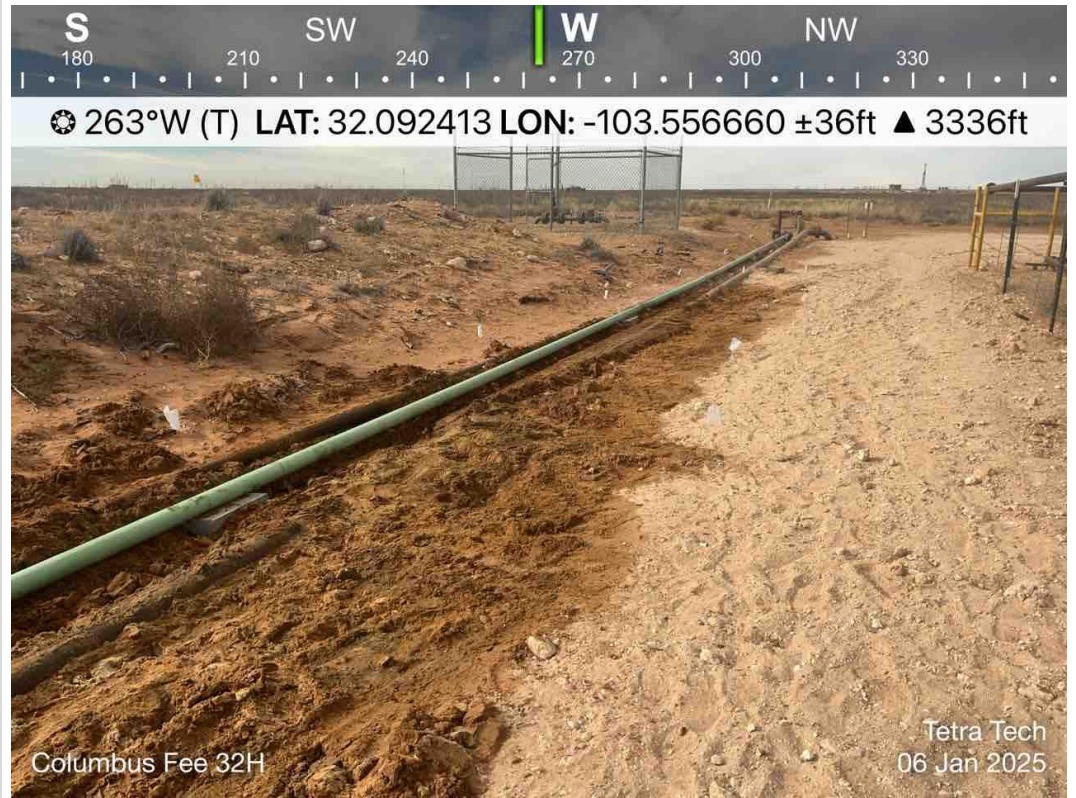
TETRA TECH, INC. PROJECT NO. 212C-MD-03749	DESCRIPTION	View North. Main release point at Columbus CTB.	7
	SITE NAME	Columbus Fee CTB	01/06/2025



TETRA TECH, INC. PROJECT NO. 212C-MD-03749	DESCRIPTION	View West. View of the release extent. View of surface steel lines and polylines running adjacent to the release.	8
	SITE NAME	Columbus Fee CTB	01/06/2025



TETRA TECH, INC. PROJECT NO. 212C-MD-03749	DESCRIPTION	View West. View of release extent. View of steel lines adjacent to the release.	9
	SITE NAME	Columbus Fee CTB	01/06/2025



TETRA TECH, INC. PROJECT NO. 212C-MD-03749	DESCRIPTION	View West. View of the release extent. View of surface steel lines.	10
	SITE NAME	Columbus Fee CTB	01/06/2025

APPENDIX D

Laboratory Analytical Data



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

January 21, 2025

LISBETH CHAVIRA

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: COLUMBUS FEE 23H FLOWLINE RELEASE

Enclosed are the results of analyses for samples received by the laboratory on 01/15/25 13:30.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C24-00112. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene".

Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 LISBETH CHAVIRA
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	01/15/2025	Sampling Date:	01/15/2025
Reported:	01/21/2025	Sampling Type:	Soil
Project Name:	COLUMBUS FEE 23H FLOWLINE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03749	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

Sample ID: AH - 1 (0-1') (H250210-01)

BTX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	0.312	0.050	01/16/2025	ND	1.93	96.3	2.00	0.504	S-04
Toluene*	4.15	0.050	01/16/2025	ND	2.03	102	2.00	0.391	S-04
Ethylbenzene*	5.70	0.050	01/16/2025	ND	2.04	102	2.00	0.587	GC-NC1, S-04
Total Xylenes*	18.6	0.150	01/16/2025	ND	6.09	101	6.00	0.379	S-04
Total BTX	28.8	0.300	01/16/2025	ND					GC-NC1, S-04

Surrogate: 4-Bromofluorobenzene (PID) 164 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	7920	16.0	01/16/2025	ND	448	112	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	431	10.0	01/16/2025	ND	181	90.7	200	0.864	
DRO >C10-C28*	1480	10.0	01/16/2025	ND	178	88.9	200	0.943	
EXT DRO >C28-C36	149	10.0	01/16/2025	ND					

Surrogate: 1-Chlorooctane 140 % 48.2-134

Surrogate: 1-Chlorooctadecane 123 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 LISBETH CHAVIRA
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	01/15/2025	Sampling Date:	01/15/2025
Reported:	01/21/2025	Sampling Type:	Soil
Project Name:	COLUMBUS FEE 23H FLOWLINE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03749	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

Sample ID: AH - 1 (2-3') (H250210-02)

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	01/16/2025	ND	1.93	96.3	2.00	0.504	
Toluene*	0.063	0.050	01/16/2025	ND	2.03	102	2.00	0.391	
Ethylbenzene*	0.312	0.050	01/16/2025	ND	2.04	102	2.00	0.587	GC-NC1
Total Xylenes*	0.283	0.150	01/16/2025	ND	6.09	101	6.00	0.379	
Total BTEX	0.658	0.300	01/16/2025	ND					GC-NC1

Surrogate: 4-Bromofluorobenzene (PID) 105 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	8000	16.0	01/16/2025	ND	448	112	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	01/16/2025	ND	181	90.7	200	0.864	
DRO >C10-C28*	114	10.0	01/16/2025	ND	178	88.9	200	0.943	
EXT DRO >C28-C36	<10.0	10.0	01/16/2025	ND					

Surrogate: 1-Chlorooctane 97.2 % 48.2-134

Surrogate: 1-Chlorooctadecane 88.8 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 LISBETH CHAVIRA
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	01/15/2025	Sampling Date:	01/15/2025
Reported:	01/21/2025	Sampling Type:	Soil
Project Name:	COLUMBUS FEE 23H FLOWLINE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03749	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

Sample ID: AH - 1 (3-3.5') (H250210-03)

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	01/16/2025	ND	1.93	96.3	2.00	0.504	
Toluene*	0.208	0.050	01/16/2025	ND	2.03	102	2.00	0.391	
Ethylbenzene*	0.434	0.050	01/16/2025	ND	2.04	102	2.00	0.587	GC-NC1
Total Xylenes*	0.797	0.150	01/16/2025	ND	6.09	101	6.00	0.379	
Total BTEX	1.44	0.300	01/16/2025	ND					GC-NC1

Surrogate: 4-Bromofluorobenzene (PID) 108 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	6800	16.0	01/16/2025	ND	448	112	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	01/16/2025	ND	181	90.7	200	0.864	
DRO >C10-C28*	85.6	10.0	01/16/2025	ND	178	88.9	200	0.943	
EXT DRO >C28-C36	<10.0	10.0	01/16/2025	ND					

Surrogate: 1-Chlorooctane 98.7 % 48.2-134

Surrogate: 1-Chlorooctadecane 89.5 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 LISBETH CHAVIRA
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	01/15/2025	Sampling Date:	01/15/2025
Reported:	01/21/2025	Sampling Type:	Soil
Project Name:	COLUMBUS FEE 23H FLOWLINE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03749	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

Sample ID: AH - 2 (0-1') (H250210-04)

BTX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	7.15	1.00	01/16/2025	ND	1.93	96.3	2.00	0.504	
Toluene*	63.3	1.00	01/16/2025	ND	2.03	102	2.00	0.391	
Ethylbenzene*	53.5	1.00	01/16/2025	ND	2.04	102	2.00	0.587	GC-NC1
Total Xylenes*	235	3.00	01/16/2025	ND	6.09	101	6.00	0.379	
Total BTX	359	6.00	01/16/2025	ND					GC-NC1

Surrogate: 4-Bromofluorobenzene (PID) 126 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	5700	16.0	01/16/2025	ND	448	112	400	0.00	

TPH 8015M	mg/kg		Analyzed By: MS					S-06	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	8520	50.0	01/16/2025	ND	181	90.7	200	0.864	
DRO >C10-C28*	21800	50.0	01/16/2025	ND	178	88.9	200	0.943	
EXT DRO >C28-C36	2820	50.0	01/16/2025	ND					

Surrogate: 1-Chlorooctane 280 % 48.2-134

Surrogate: 1-Chlorooctadecane 362 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

TETRA TECH
 LISBETH CHAVIRA
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	01/15/2025	Sampling Date:	01/15/2025
Reported:	01/21/2025	Sampling Type:	Soil
Project Name:	COLUMBUS FEE 23H FLOWLINE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03749	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

Sample ID: AH - 2 (2-3') (H250210-05)

BTX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	4.39	1.00	01/16/2025	ND	1.93	96.3	2.00	0.504	
Toluene*	51.4	1.00	01/16/2025	ND	2.03	102	2.00	0.391	
Ethylbenzene*	42.4	1.00	01/16/2025	ND	2.04	102	2.00	0.587	GC-NC1
Total Xylenes*	183	3.00	01/16/2025	ND	6.09	101	6.00	0.379	
Total BTX	281	6.00	01/16/2025	ND					GC-NC1

Surrogate: 4-Bromofluorobenzene (PID) 122 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	6800	16.0	01/16/2025	ND	448	112	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS						S-06
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10*	5880	50.0	01/16/2025	ND	181	90.7	200	0.864		
DRO >C10-C28*	13200	50.0	01/16/2025	ND	178	88.9	200	0.943		
EXT DRO >C28-C36	1750	50.0	01/16/2025	ND						

Surrogate: 1-Chlorooctane 223 % 48.2-134

Surrogate: 1-Chlorooctadecane 207 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

TETRA TECH
 LISBETH CHAVIRA
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	01/15/2025	Sampling Date:	01/15/2025
Reported:	01/21/2025	Sampling Type:	Soil
Project Name:	COLUMBUS FEE 23H FLOWLINE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03749	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

Sample ID: AH - 2 (3-3.5') (H250210-06)

BTX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	3.99	1.00	01/16/2025	ND	1.88	94.1	2.00	2.92	QM-07
Toluene*	43.0	1.00	01/16/2025	ND	1.94	97.0	2.00	0.243	QM-07
Ethylbenzene*	15.2	1.00	01/16/2025	ND	2.11	106	2.00	3.04	3C-NC1, QM-07
Total Xylenes*	140	3.00	01/16/2025	ND	6.37	106	6.00	3.36	QM-07
Total BTX	202	6.00	01/16/2025	ND					GC-NC1

Surrogate: 4-Bromofluorobenzene (PID) 104 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	6600	16.0	01/16/2025	ND	448	112	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS						S-04
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10*	4210	10.0	01/16/2025	ND	181	90.7	200	0.864		
DRO >C10-C28*	9550	10.0	01/16/2025	ND	178	88.9	200	0.943		
EXT DRO >C28-C36	926	10.0	01/16/2025	ND						

Surrogate: 1-Chlorooctane 257 % 48.2-134

Surrogate: 1-Chlorooctadecane 152 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

TETRA TECH
 LISBETH CHAVIRA
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	01/15/2025	Sampling Date:	01/15/2025
Reported:	01/21/2025	Sampling Type:	Soil
Project Name:	COLUMBUS FEE 23H FLOWLINE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03749	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

Sample ID: AH - 3 (0-1') (H250210-07)

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	1.28	1.00	01/16/2025	ND	1.88	94.1	2.00	2.92	
Toluene*	32.5	1.00	01/16/2025	ND	1.94	97.0	2.00	0.243	
Ethylbenzene*	15.0	1.00	01/16/2025	ND	2.11	106	2.00	3.04	GC-NC1
Total Xylenes*	147	3.00	01/16/2025	ND	6.37	106	6.00	3.36	
Total BTEX	196	6.00	01/16/2025	ND					GC-NC1

Surrogate: 4-Bromofluorobenzene (PID) 115 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	4500	16.0	01/16/2025	ND	448	112	400	0.00		

TPH 8015M	mg/kg		Analyzed By: MS					S-06	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	4430	50.0	01/16/2025	ND	181	90.7	200	0.864	
DRO >C10-C28*	11900	50.0	01/16/2025	ND	178	88.9	200	0.943	
EXT DRO >C28-C36	1540	50.0	01/16/2025	ND					

Surrogate: 1-Chlorooctane 208 % 48.2-134

Surrogate: 1-Chlorooctadecane 199 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

TETRA TECH
 LISBETH CHAVIRA
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	01/15/2025	Sampling Date:	01/15/2025
Reported:	01/21/2025	Sampling Type:	Soil
Project Name:	COLUMBUS FEE 23H FLOWLINE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03749	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

Sample ID: AH - 3 (2-3') (H250210-08)

BTX 8021B		mg/kg		Analyzed By: JH				S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	01/16/2025	ND	1.88	94.1	2.00	2.92	
Toluene*	1.79	0.050	01/16/2025	ND	1.94	97.0	2.00	0.243	
Ethylbenzene*	1.13	0.050	01/16/2025	ND	2.11	106	2.00	3.04	GC-NC1
Total Xylenes*	11.4	0.150	01/16/2025	ND	6.37	106	6.00	3.36	
Total BTX	14.4	0.300	01/16/2025	ND					GC-NC1

Surrogate: 4-Bromofluorobenzene (PID) 141 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	5800	16.0	01/16/2025	ND	448	112	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS				S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	489	10.0	01/16/2025	ND	181	90.7	200	0.864	
DRO >C10-C28*	1770	10.0	01/16/2025	ND	178	88.9	200	0.943	
EXT DRO >C28-C36	216	10.0	01/16/2025	ND					

Surrogate: 1-Chlorooctane 137 % 48.2-134

Surrogate: 1-Chlorooctadecane 120 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

TETRA TECH
 LISBETH CHAVIRA
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	01/15/2025	Sampling Date:	01/15/2025
Reported:	01/21/2025	Sampling Type:	Soil
Project Name:	COLUMBUS FEE 23H FLOWLINE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03749	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

Sample ID: AH - 3 (3-3.5') (H250210-09)

BTEx 8021B		mg/kg		Analyzed By: JH				S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	01/16/2025	ND	1.88	94.1	2.00	2.92	
Toluene*	1.38	0.050	01/16/2025	ND	1.94	97.0	2.00	0.243	
Ethylbenzene*	0.983	0.050	01/16/2025	ND	2.11	106	2.00	3.04	GC-NC1
Total Xylenes*	10.3	0.150	01/16/2025	ND	6.37	106	6.00	3.36	
Total BTEX	12.6	0.300	01/16/2025	ND					GC-NC1

Surrogate: 4-Bromofluorobenzene (PID) 148 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	5600	16.0	01/16/2025	ND	448	112	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	512	10.0	01/16/2025	ND	194	96.9	200	0.769	QM-07
DRO >C10-C28*	1680	10.0	01/16/2025	ND	175	87.4	200	0.503	QM-07
EXT DRO >C28-C36	246	10.0	01/16/2025	ND					

Surrogate: 1-Chlorooctane 99.3 % 48.2-134

Surrogate: 1-Chlorooctadecane 91.2 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

TETRA TECH
 LISBETH CHAVIRA
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	01/15/2025	Sampling Date:	01/15/2025
Reported:	01/21/2025	Sampling Type:	Soil
Project Name:	COLUMBUS FEE 23H FLOWLINE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03749	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

Sample ID: AH - 4 (0-1') (H250210-10)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	01/16/2025	ND	1.88	94.1	2.00	2.92		
Toluene*	<0.050	0.050	01/16/2025	ND	1.94	97.0	2.00	0.243		
Ethylbenzene*	<0.050	0.050	01/16/2025	ND	2.11	106	2.00	3.04		
Total Xylenes*	0.291	0.150	01/16/2025	ND	6.37	106	6.00	3.36		
Total BTEx	<0.300	0.300	01/16/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 107 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	160	16.0	01/16/2025	ND	448	112	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	12.2	10.0	01/16/2025	ND	194	96.9	200	0.769	
DRO >C10-C28*	109	10.0	01/16/2025	ND	175	87.4	200	0.503	
EXT DRO >C28-C36	10.8	10.0	01/16/2025	ND					

Surrogate: 1-Chlorooctane 84.0 % 48.2-134

Surrogate: 1-Chlorooctadecane 92.2 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

TETRA TECH
 LISBETH CHAVIRA
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	01/15/2025	Sampling Date:	01/15/2025
Reported:	01/21/2025	Sampling Type:	Soil
Project Name:	COLUMBUS FEE 23H FLOWLINE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03749	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

Sample ID: AH - 4 (2-3') (H250210-11)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	01/16/2025	ND	1.88	94.1	2.00	2.92		
Toluene*	<0.050	0.050	01/16/2025	ND	1.94	97.0	2.00	0.243		
Ethylbenzene*	<0.050	0.050	01/16/2025	ND	2.11	106	2.00	3.04		
Total Xylenes*	0.461	0.150	01/16/2025	ND	6.37	106	6.00	3.36		
Total BTEx	0.461	0.300	01/16/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 112 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	352	16.0	01/16/2025	ND	448	112	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	11.0	10.0	01/16/2025	ND	194	96.9	200	0.769	
DRO >C10-C28*	78.5	10.0	01/16/2025	ND	175	87.4	200	0.503	
EXT DRO >C28-C36	<10.0	10.0	01/16/2025	ND					

Surrogate: 1-Chlorooctane 72.3 % 48.2-134

Surrogate: 1-Chlorooctadecane 79.2 % 49.1-148

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Analytical Results For:

TETRA TECH
 LISBETH CHAVIRA
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	01/15/2025	Sampling Date:	01/15/2025
Reported:	01/21/2025	Sampling Type:	Soil
Project Name:	COLUMBUS FEE 23H FLOWLINE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03749	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

Sample ID: AH - 4 (3-3.5') (H250210-12)

BTX 8021B		mg/kg		Analyzed By: JH				S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	01/16/2025	ND	1.88	94.1	2.00	2.92	
Toluene*	0.444	0.050	01/16/2025	ND	1.94	97.0	2.00	0.243	
Ethylbenzene*	0.461	0.050	01/16/2025	ND	2.11	106	2.00	3.04	GC-NC1
Total Xylenes*	5.71	0.150	01/16/2025	ND	6.37	106	6.00	3.36	
Total BTX	6.62	0.300	01/16/2025	ND					GC-NC1

Surrogate: 4-Bromofluorobenzene (PID) 155 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	208	16.0	01/16/2025	ND	448	112	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	231	10.0	01/16/2025	ND	194	96.9	200	0.769	
DRO >C10-C28*	920	10.0	01/16/2025	ND	175	87.4	200	0.503	
EXT DRO >C28-C36	131	10.0	01/16/2025	ND					

Surrogate: 1-Chlorooctane 93.7 % 48.2-134

Surrogate: 1-Chlorooctadecane 91.9 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 LISBETH CHAVIRA
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	01/15/2025	Sampling Date:	01/15/2025
Reported:	01/21/2025	Sampling Type:	Soil
Project Name:	COLUMBUS FEE 23H FLOWLINE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03749	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

Sample ID: AH - 5 (0-1') (H250210-13)

BTX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	01/16/2025	ND	1.88	94.1	2.00	2.92	
Toluene*	<0.050	0.050	01/16/2025	ND	1.94	97.0	2.00	0.243	
Ethylbenzene*	<0.050	0.050	01/16/2025	ND	2.11	106	2.00	3.04	
Total Xylenes*	<0.150	0.150	01/16/2025	ND	6.37	106	6.00	3.36	
Total BTX	<0.300	0.300	01/16/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 109 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	01/16/2025	ND	448	112	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	01/16/2025	ND	194	96.9	200	0.769	
DRO >C10-C28*	<10.0	10.0	01/16/2025	ND	175	87.4	200	0.503	
EXT DRO >C28-C36	<10.0	10.0	01/16/2025	ND					

Surrogate: 1-Chlorooctane 84.0 % 48.2-134

Surrogate: 1-Chlorooctadecane 92.7 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 LISBETH CHAVIRA
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	01/15/2025	Sampling Date:	01/15/2025
Reported:	01/21/2025	Sampling Type:	Soil
Project Name:	COLUMBUS FEE 23H FLOWLINE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03749	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

Sample ID: AH - 6 (0-1') (H250210-14)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	01/16/2025	ND	1.88	94.1	2.00	2.92		
Toluene*	<0.050	0.050	01/16/2025	ND	1.94	97.0	2.00	0.243		
Ethylbenzene*	<0.050	0.050	01/16/2025	ND	2.11	106	2.00	3.04		
Total Xylenes*	<0.150	0.150	01/16/2025	ND	6.37	106	6.00	3.36		
Total BTEx	<0.300	0.300	01/16/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 111 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	16.0	16.0	01/16/2025	ND	448	112	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	01/16/2025	ND	194	96.9	200	0.769	
DRO >C10-C28*	<10.0	10.0	01/16/2025	ND	175	87.4	200	0.503	
EXT DRO >C28-C36	<10.0	10.0	01/16/2025	ND					

Surrogate: 1-Chlorooctane 87.0 % 48.2-134

Surrogate: 1-Chlorooctadecane 77.2 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

TETRA TECH
 LISBETH CHAVIRA
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	01/15/2025	Sampling Date:	01/15/2025
Reported:	01/21/2025	Sampling Type:	Soil
Project Name:	COLUMBUS FEE 23H FLOWLINE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03749	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

Sample ID: AH - 7 (0-1') (H250210-15)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	01/16/2025	ND	1.88	94.1	2.00	2.92		
Toluene*	<0.050	0.050	01/16/2025	ND	1.94	97.0	2.00	0.243		
Ethylbenzene*	<0.050	0.050	01/16/2025	ND	2.11	106	2.00	3.04		
Total Xylenes*	<0.150	0.150	01/16/2025	ND	6.37	106	6.00	3.36		
Total BTEx	<0.300	0.300	01/16/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 104 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	64.0	16.0	01/16/2025	ND	448	112	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	01/16/2025	ND	194	96.9	200	0.769	
DRO >C10-C28*	<10.0	10.0	01/16/2025	ND	175	87.4	200	0.503	
EXT DRO >C28-C36	<10.0	10.0	01/16/2025	ND					

Surrogate: 1-Chlorooctane 79.1 % 48.2-134

Surrogate: 1-Chlorooctadecane 87.7 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 LISBETH CHAVIRA
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	01/15/2025	Sampling Date:	01/15/2025
Reported:	01/21/2025	Sampling Type:	Soil
Project Name:	COLUMBUS FEE 23H FLOWLINE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03749	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

Sample ID: AH - 8 (0-1') (H250210-16)

BTX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	01/16/2025	ND	1.88	94.1	2.00	2.92	
Toluene*	<0.050	0.050	01/16/2025	ND	1.94	97.0	2.00	0.243	
Ethylbenzene*	<0.050	0.050	01/16/2025	ND	2.11	106	2.00	3.04	
Total Xylenes*	<0.150	0.150	01/16/2025	ND	6.37	106	6.00	3.36	
Total BTX	<0.300	0.300	01/16/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 107 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	01/16/2025	ND	448	112	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	01/16/2025	ND	194	96.9	200	0.769	
DRO >C10-C28*	<10.0	10.0	01/16/2025	ND	175	87.4	200	0.503	
EXT DRO >C28-C36	<10.0	10.0	01/16/2025	ND					

Surrogate: 1-Chlorooctane 78.1 % 48.2-134

Surrogate: 1-Chlorooctadecane 88.5 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Notes and Definitions

S-06	The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.
S-04	The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
GC-NC1	8260 confirmation analysis was performed; initial GC results were not supported by GC/MS analysis and are biased high with interfering compounds.
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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A handwritten signature in black ink, appearing to read "Celey D. Keene", is written over a horizontal line.

Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

February 19, 2025

LISBETH CHAVIRA

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: COLUMBUS FEE 23H FLOWLINE RELEASE

Enclosed are the results of analyses for samples received by the laboratory on 02/13/25 11:15.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C24-00112. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is fluid and cursive, with the first name "Celey" and last name "Keene" clearly distinguishable.

Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 LISBETH CHAVIRA
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	02/13/2025	Sampling Date:	02/13/2025
Reported:	02/19/2025	Sampling Type:	Soil
Project Name:	COLUMBUS FEE 23H FLOWLINE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03749	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

Sample ID: T - 1 (0-1') (H250871-01)

BTX 8021B		mg/kg		Analyzed By: JH				S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	0.219	0.200	02/13/2025	ND	1.89	94.3	2.00	3.47	
Toluene*	3.68	0.200	02/13/2025	ND	2.00	100	2.00	5.49	
Ethylbenzene*	1.73	0.200	02/13/2025	ND	2.15	107	2.00	6.53	
Total Xylenes*	17.6	0.600	02/13/2025	ND	6.58	110	6.00	5.88	
Total BTX	23.2	1.20	02/13/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 143 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	6000	16.0	02/13/2025	ND	416	104	400	3.77	

TPH 8015M		mg/kg		Analyzed By: MS				S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	791	10.0	02/13/2025	ND	198	98.9	200	3.38	
DRO >C10-C28*	2880	10.0	02/13/2025	ND	191	95.4	200	0.316	
EXT DRO >C28-C36	399	10.0	02/13/2025	ND					

Surrogate: 1-Chlorooctane 180 % 48.2-134

Surrogate: 1-Chlorooctadecane 148 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

TETRA TECH
 LISBETH CHAVIRA
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	02/13/2025	Sampling Date:	02/13/2025
Reported:	02/19/2025	Sampling Type:	Soil
Project Name:	COLUMBUS FEE 23H FLOWLINE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03749	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

Sample ID: T - 1 (2'-3') (H250871-02)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	02/13/2025	ND	1.89	94.3	2.00	3.47		
Toluene*	<0.050	0.050	02/13/2025	ND	2.00	100	2.00	5.49		
Ethylbenzene*	<0.050	0.050	02/13/2025	ND	2.15	107	2.00	6.53		
Total Xylenes*	<0.150	0.150	02/13/2025	ND	6.58	110	6.00	5.88		
Total BTEX	<0.300	0.300	02/13/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 119 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	8000	16.0	02/13/2025	ND	400	100	400	3.92	QM-07	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/13/2025	ND	198	98.9	200	3.38	
DRO >C10-C28*	<10.0	10.0	02/13/2025	ND	191	95.4	200	0.316	
EXT DRO >C28-C36	<10.0	10.0	02/13/2025	ND					

Surrogate: 1-Chlorooctane 126 % 48.2-134

Surrogate: 1-Chlorooctadecane 136 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

TETRA TECH
 LISBETH CHAVIRA
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	02/13/2025	Sampling Date:	02/13/2025
Reported:	02/19/2025	Sampling Type:	Soil
Project Name:	COLUMBUS FEE 23H FLOWLINE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03749	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

Sample ID: T - 1 (3'-4') (H250871-03)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	02/13/2025	ND	1.89	94.3	2.00	3.47		
Toluene*	<0.050	0.050	02/13/2025	ND	2.00	100	2.00	5.49		
Ethylbenzene*	<0.050	0.050	02/13/2025	ND	2.15	107	2.00	6.53		
Total Xylenes*	<0.150	0.150	02/13/2025	ND	6.58	110	6.00	5.88		
Total BTEx	<0.300	0.300	02/13/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 124 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	2120	16.0	02/13/2025	ND	400	100	400	3.92		

TPH 8015M		mg/kg		Analyzed By: MS				S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	14.7	10.0	02/13/2025	ND	198	98.9	200	3.38	
DRO >C10-C28*	355	10.0	02/13/2025	ND	191	95.4	200	0.316	
EXT DRO >C28-C36	59.8	10.0	02/13/2025	ND					

Surrogate: 1-Chlorooctane 135 % 48.2-134

Surrogate: 1-Chlorooctadecane 144 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

TETRA TECH
 LISBETH CHAVIRA
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	02/13/2025	Sampling Date:	02/13/2025
Reported:	02/19/2025	Sampling Type:	Soil
Project Name:	COLUMBUS FEE 23H FLOWLINE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03749	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

Sample ID: T - 1 (4'-4.5') (H250871-04)

BTX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/13/2025	ND	1.89	94.3	2.00	3.47	
Toluene*	<0.050	0.050	02/13/2025	ND	2.00	100	2.00	5.49	
Ethylbenzene*	<0.050	0.050	02/13/2025	ND	2.15	107	2.00	6.53	
Total Xylenes*	<0.150	0.150	02/13/2025	ND	6.58	110	6.00	5.88	
Total BTX	<0.300	0.300	02/13/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 123 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1570	16.0	02/13/2025	ND	400	100	400	3.92	

TPH 8015M		mg/kg		Analyzed By: MS				S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/13/2025	ND	198	98.9	200	3.38	
DRO >C10-C28*	<10.0	10.0	02/13/2025	ND	191	95.4	200	0.316	
EXT DRO >C28-C36	<10.0	10.0	02/13/2025	ND					

Surrogate: 1-Chlorooctane 145 % 48.2-134

Surrogate: 1-Chlorooctadecane 151 % 49.1-148

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Analytical Results For:

TETRA TECH
 LISBETH CHAVIRA
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	02/13/2025	Sampling Date:	02/13/2025
Reported:	02/19/2025	Sampling Type:	Soil
Project Name:	COLUMBUS FEE 23H FLOWLINE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03749	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

Sample ID: T - 2 (0-1') (H250871-05)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	13.9	10.0	02/13/2025	ND	1.89	94.3	2.00	3.47		
Toluene*	152	10.0	02/13/2025	ND	2.00	100	2.00	5.49		
Ethylbenzene*	43.5	10.0	02/13/2025	ND	2.15	107	2.00	6.53		
Total Xylenes*	405	30.0	02/13/2025	ND	6.58	110	6.00	5.88		
Total BTEX	615	60.0	02/13/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 109 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	560	16.0	02/13/2025	ND	400	100	400	3.92		

TPH 8015M		mg/kg		Analyzed By: MS				S-06	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	12200	50.0	02/13/2025	ND	198	98.9	200	3.38	
DRO >C10-C28*	21900	50.0	02/13/2025	ND	191	95.4	200	0.316	
EXT DRO >C28-C36	3320	50.0	02/13/2025	ND					

Surrogate: 1-Chlorooctane 273 % 48.2-134

Surrogate: 1-Chlorooctadecane 404 % 49.1-148

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Analytical Results For:

TETRA TECH
 LISBETH CHAVIRA
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	02/13/2025	Sampling Date:	02/13/2025
Reported:	02/19/2025	Sampling Type:	Soil
Project Name:	COLUMBUS FEE 23H FLOWLINE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03749	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

Sample ID: T - 2 (2'-3') (H250871-06)

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	8.74	5.00	02/13/2025	ND	1.89	94.3	2.00	3.47	
Toluene*	70.7	5.00	02/13/2025	ND	2.00	100	2.00	5.49	
Ethylbenzene*	16.7	5.00	02/13/2025	ND	2.15	107	2.00	6.53	
Total Xylenes*	158	15.0	02/13/2025	ND	6.58	110	6.00	5.88	
Total BTEX	254	30.0	02/13/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 105 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	2350	16.0	02/13/2025	ND	400	100	400	3.92		

TPH 8015M	mg/kg		Analyzed By: MS					S-06	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	6750	50.0	02/13/2025	ND	198	98.9	200	3.38	
DRO >C10-C28*	10000	50.0	02/13/2025	ND	191	95.4	200	0.316	
EXT DRO >C28-C36	1450	50.0	02/13/2025	ND					

Surrogate: 1-Chlorooctane 531 % 48.2-134

Surrogate: 1-Chlorooctadecane 201 % 49.1-148

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Analytical Results For:

TETRA TECH
 LISBETH CHAVIRA
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	02/13/2025	Sampling Date:	02/13/2025
Reported:	02/19/2025	Sampling Type:	Soil
Project Name:	COLUMBUS FEE 23H FLOWLINE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03749	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

Sample ID: T - 2 (3'-4') (H250871-07)

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	30.4	5.00	02/13/2025	ND	1.89	94.3	2.00	3.47	
Toluene*	193	5.00	02/13/2025	ND	2.00	100	2.00	5.49	
Ethylbenzene*	44.3	5.00	02/13/2025	ND	2.15	107	2.00	6.53	
Total Xylenes*	395	15.0	02/13/2025	ND	6.58	110	6.00	5.88	
Total BTEX	663	30.0	02/13/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 103 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	5200	16.0	02/13/2025	ND	400	100	400	3.92		

TPH 8015M		mg/kg		Analyzed By: MS				S-06	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	18100	50.0	02/13/2025	ND	198	98.9	200	3.38	
DRO >C10-C28*	26400	50.0	02/13/2025	ND	191	95.4	200	0.316	
EXT DRO >C28-C36	3690	50.0	02/13/2025	ND					

Surrogate: 1-Chlorooctane 563 % 48.2-134

Surrogate: 1-Chlorooctadecane 468 % 49.1-148

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Analytical Results For:

TETRA TECH
 LISBETH CHAVIRA
 901 WEST WALL STREET , STE 100
 MIDLAND TX, 79701
 Fax To: (432) 682-3946

Received:	02/13/2025	Sampling Date:	02/13/2025
Reported:	02/19/2025	Sampling Type:	Soil
Project Name:	COLUMBUS FEE 23H FLOWLINE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03749	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

Sample ID: T - 2 (4'-5') (H250871-08)

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	8.54	5.00	02/13/2025	ND	1.89	94.3	2.00	3.47	
Toluene*	86.7	5.00	02/13/2025	ND	2.00	100	2.00	5.49	
Ethylbenzene*	23.7	5.00	02/13/2025	ND	2.15	107	2.00	6.53	
Total Xylenes*	220	15.0	02/13/2025	ND	6.58	110	6.00	5.88	
Total BTEX	339	30.0	02/13/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 105 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	4660	16.0	02/13/2025	ND	400	100	400	3.92	
TPH 8015M	mg/kg		Analyzed By: MS						S-06

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	9830	50.0	02/13/2025	ND	198	98.9	200	3.38	
DRO >C10-C28*	18400	50.0	02/13/2025	ND	191	95.4	200	0.316	
EXT DRO >C28-C36	2660	50.0	02/13/2025	ND					

Surrogate: 1-Chlorooctane 298 % 48.2-134

Surrogate: 1-Chlorooctadecane 333 % 49.1-148

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Notes and Definitions

S-06	The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.
S-04	The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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A handwritten signature in black ink, appearing to read "Celey D. Keene".

Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

Company Name: Tetra Tech

BILL TO

ANALYSIS REQUEST

[illegible]

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

General Information
Phone: (505) 629-6116

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

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

QUESTIONS

Action 448306

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 448306
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2500736394
Incident Name	NAPP2500736394 COLUMBUS FEE 023H @ 0
Incident Type	Release Other
Incident Status	Remediation Plan Received
Incident Facility	[fAB1909251433] COLUMBUS FEE #23H CTB

Location of Release Source	
Please answer all the questions in this group.	
Site Name	Columbus Fee 023H
Date Release Discovered	12/30/2024
Surface Owner	Private

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

Nature and Volume of Release	
Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.	
Crude Oil Released (bbls) Details	Cause: Corrosion Flow Line - Production Crude Oil Released: 1 BBL Recovered: 1 BBL Lost: 0 BBL.
Produced Water Released (bbls) Details	Cause: Corrosion Flow Line - Production Produced Water Released: 13 BBL Recovered: 1 BBL Lost: 12 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.

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 2

Action 448306

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 448306
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

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: 01/07/2025
--	---

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

General Information
Phone: (505) 629-6116

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

QUESTIONS, Page 3

Action 448306

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 448306
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

Site Characterization	
<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	Direct Measurement
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Between 1 and 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	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	Between 500 and 1000 (ft.)
Any other fresh water well or spring	Between 500 and 1000 (ft.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between ½ and 1 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Greater than 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan	
<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
Soil Contamination Sampling: (Provide the highest observable value for each, in milligrams per kilograms.)	
Chloride (EPA 300.0 or SM4500 Cl B)	8000
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	37420
GRO+DRO (EPA SW-846 Method 8015M)	34100
BTEX (EPA SW-846 Method 8021B or 8260B)	663
Benzene (EPA SW-846 Method 8021B or 8260B)	30.4
<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	06/02/2025
On what date will (or did) the final sampling or liner inspection occur	06/04/2025
On what date will (or was) the remediation complete(d)	06/06/2025
What is the estimated surface area (in square feet) that will be reclaimed	528
What is the estimated volume (in cubic yards) that will be reclaimed	103
What is the estimated surface area (in square feet) that will be remediated	528
What is the estimated volume (in cubic yards) that will be remediated	103
<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>	

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 4

Action 448306

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 448306
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

Remediation Plan (continued)	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:	
<i>(Select all answers below that apply.)</i>	
(Ex Situ) Excavation and off-site disposal (i.e. dig and haul, hydrovac, etc.)	Yes
Which OCD approved facility will be used for off-site disposal	COLUMBUS FEE #23H CTB [FAB1909251433]
OR which OCD approved well (API) will be used for off-site disposal	Not answered.
OR is the off-site disposal site, to be used, out-of-state	Not answered.
OR is the off-site disposal site, to be used, an NMED facility	Not answered.
(Ex Situ) Excavation and on-site remediation (i.e. On-Site Land Farms)	Not answered.
(In Situ) Soil Vapor Extraction	Not answered.
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	Not answered.
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	Not answered.
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	Not answered.
Ground Water Abatement pursuant to 19.15.30 NMAC	Not answered.
OTHER (Non-listed remedial process)	Not answered.
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 04/03/2025
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 5

Action 448306

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 448306
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

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

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QUESTIONS, Page 6

Action 448306

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 448306
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	{Unavailable.}

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	No

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CONDITIONS

Action 448306

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 448306
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

CONDITIONS

Created By	Condition	Condition Date
rhamlet	The Remediation Plan is Conditionally Approved. When nearby wells are used to determine depth to groundwater, the wells should be no further than ½ mile away from the site, and data should be no more than 25 years old, and well construction information should be provided. If evidence of depth to ground water within a ½ mile radius of the site cannot be provided, impacted soils will need to meet Table 1 Closure Criteria for ground water at a depth of 50 feet or less. If you feel the depth to groundwater is >100', a shallow borehole can be drilled to 101' allowing for verification of the depth. If water is not visible after reaching bottom-hole and waiting 72 hours, the OCD will accept this as evidence. We would just need a copy of the driller's log.	4/7/2025
rhamlet	Floor confirmation samples should be delineated/excavated to meet closure criteria standards from Table 1 of the OCD Spill Rule for site assessment/characterization/depth to water determination. Sidewall/Edge samples should be delineated/excavated to 600 mg/kg for chlorides and 100 mg/kg for TPH to define the edge of the release. Please make sure that the edge of the release extent is accurately defined, especially around equipment. All off pad areas must meet reclamation standards in the OCD Spill Rule. The work will need to be completed in 90 days after the report has been reviewed.	4/7/2025