



July 17, 2025

New Mexico Oil Conservation Division

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

**Re: Closure Request
Smalls Federal 2H Battery
Incident Number nAPP2514026867
Lea County, New Mexico**

To Whom It May Concern:

COG Operating, LLC, (COG), has prepared this *Closure Request* to document the findings of a liner integrity inspection conducted at the Smalls Federal 2H Battery (Site) following the release of produced water within a lined containment. Based on the liner integrity inspection activities, COG is submitting this Closure Request, describing assessment activities that have occurred and requesting no further action and closure for Incident Number nAPP2514026867.

SITE DESCRIPTION AND RELEASE SUMMARY

The site is located in Unit O, Section 28, Township 22 South, Range 34 East, in Lea County, New Mexico (32.3560333, -103.47238333) and is associated with oil and gas exploration and production operations on state land managed by the New Mexico State Land Office (NMSLO).

On May 19, 2025, field personnel discovered that the mechanical seal on the water transfer pump had failed causing a release of approximately thirty-five point three eight four (35.3026) barrels of produced water being released into a lined containment. A vacuum truck was dispatched to the site to recover free-standing fluids and approximately thirty-four (34) barrels of produced water was recovered. The transfer pump was isolated to prevent fluid being further released and the mechanical seal was replaced. COG reported the release to the New Mexico Oil Conservation Division (NMOCD) and New Mexico State Land Office on a *Release Notification Form C-141* (Form C-141) on May 20, 2025. The release was assigned Incident Number nAPP2514026867.

SITE CHARACTERIZATION AND CLOSURE CRITERIA

The site is located within a low karst area. Based on a review of the New Mexico Office of State Engineers databases, three known water sources are within a 0.50-mile radius of the location. The closest well is located approximately 0.39 miles Southeast of the Site in Unit Letter D, S34, T22S, R34E and was drilled in November of 2019. The well has a reported depth to groundwater of 180 feet below ground surface. Per the NMOCD regulatory criteria established in 19.15.29.12 NMAC, the following criteria were utilized in assessing the site.

- Benzene: 10 milligrams per kilogram (mg/kg).
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX): 50 mg/kg.
- TPH: 2,500mg/kg (GRO + DRO + MRO).
- Chloride: 20,000 mg/kg.

LINER INTEGRITY INSPECTION ACTIVITIES

A 48-hour advance notice of the liner inspection was submitted to the NMOCD and NMSLO on July 14, 2025. Prior to conducting the liner integrity inspection, COG operations power washed the liner to remove dirt and debris and recover any residual produced water. A liner integrity inspection was conducted by Jacob Laird on July 16, 2025. Upon inspection, no rips, tears, holes, or damage was observed. The liner was determined to be sufficient, and all released fluids have been removed. Refer to photolog for details.

CLOSURE REQUEST

Based on the liner inspection throughout the facility, the liner was determined to be sufficient. The release was contained laterally by the lined containment and the liner was performing as designed. No further actions are required at the site. COG Operating, LLC respectfully requests that the New Mexico Oil Conservation Division and the New Mexico State Land Office grant closure approval for Incident Number nAPP2514026867.

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

Sincerely,

Jacob Laird

Jacob Laird
Environmental Engineer
jacob.laird@conocophillips.com

Appendices:

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

Appendix A: NMOCD Correspondence

Appendix B: Photolog

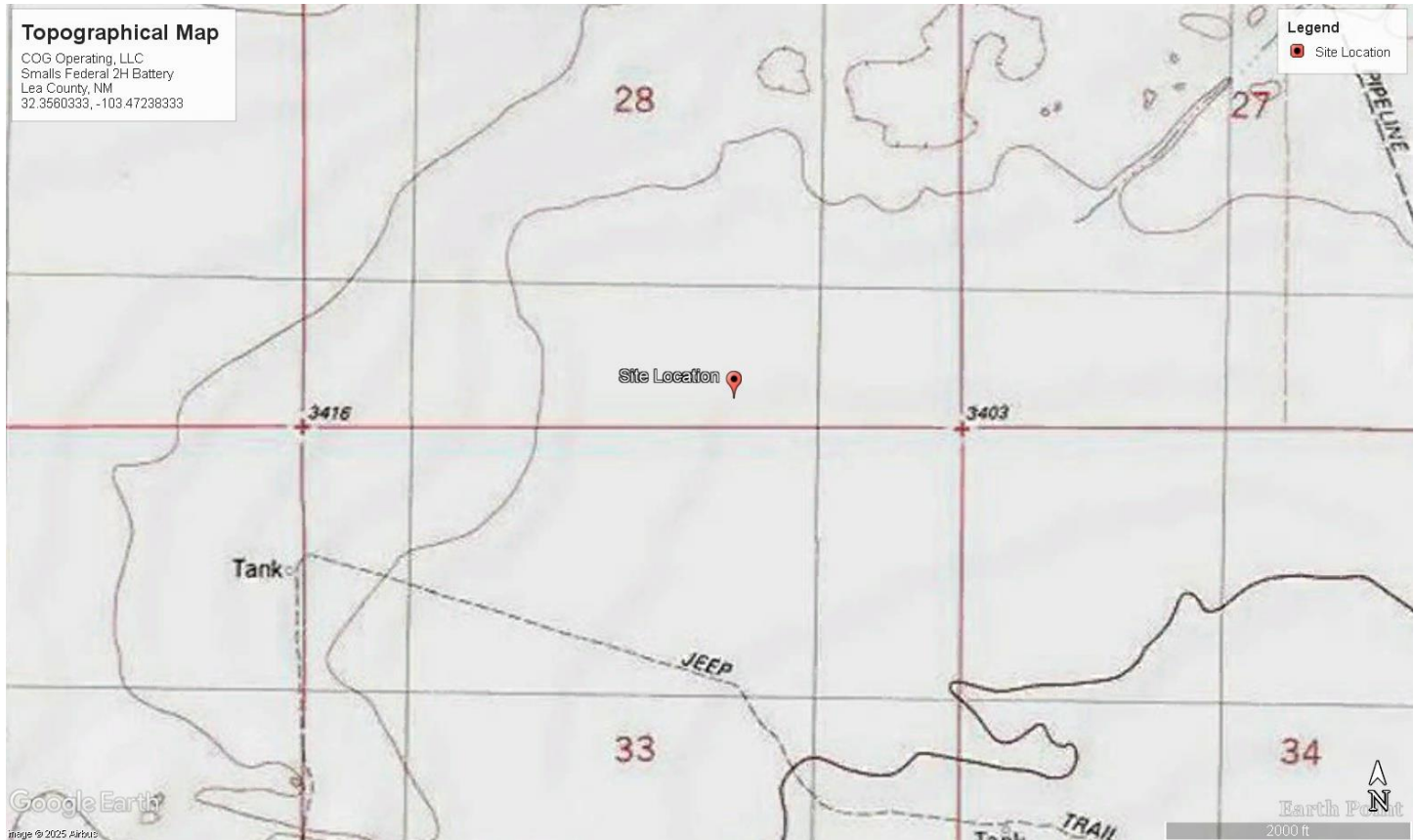
Appendix C: Site Characterization and Ground Water

Figures: Site Maps



Overview Map

COG Operating, LLC
Smalls Federal 2H Battery
Lea County, New Mexico
32.3560333, -103.47238333



Topographical Map

COG Operating, LLC
Smalls Federal 2H Battery
Lea County, New Mexico
32.3560333, -103.47238333



Secondary Containment Map

COG Operating, LLC
Smalls Federal 2H Battery
Lea County, New Mexico
32.3560333, -103.47238333

Appendix A: NMOCD Correspondence

Convert Irregular shape into a series of rectangles	Length (ft.)	Width (ft.)	Average Depth (in.)	Estimated <u>Pool</u> Area (sq. ft.)	Estimated volume of each pool area (bbl.)	Penetration allowance (ft.)	Total Estimated Volume of Spill (bbl.)
Rectangle A	50	100	0.5	5000.00	37.08	0.00	37.16
Rectangle B				0.00	0.00	0.00	0.00
Rectangle C				0.00	0.00	0.00	0.00
Rectangle D				0.00	0.00	0.00	0.00
Rectangle E				0.00	0.00	0.00	0.00
Rectangle F				0.00	0.00	0.00	0.00
Rectangle G				0.00	0.00	0.00	0.00
Rectangle H				0.00	0.00	0.00	0.00
Rectangle I				0.00	0.00	0.00	0.00
Rectangle J				0.00	0.00	0.00	0.00

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 473331

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 473331
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2514026867
Incident Name	NAPP2514026867 SMALLS FED 2H BATTERY @ 0
Incident Type	Produced Water Release
Incident Status	Initial C-141 Received
Incident Facility	[fAPP2203954141] Smalls Fed 2H Battery

Location of Release Source	
Please answer all the questions in this group.	
Site Name	Smalls Fed 2H Battery
Date Release Discovered	05/19/2025
Surface Owner	State

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

Nature and Volume of Release	
Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.	
Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Equipment Failure Pump Produced Water Released: 35 BBL Recovered: 34 BBL Lost: 1 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 473331

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 473331
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.	

Initial Response

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

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

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

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

I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 06/11/2025
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QUESTIONS, Page 3

Action 473331

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 473331
	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 473331

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 473331
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

CONDITIONS

Created By	Condition	Condition Date
scott.rodgers	Initial C-141 approved. Please note that the due date was 06/03/2025	6/11/2025

From: [Hall, Brittany, EMNRD](#)
To: [Laird, Jacob](#); [Fejervary Morena, Gustavo A.](#)
Cc: [Wells, Shelly, EMNRD](#); [Bratcher, Michael, EMNRD](#);
Subject: RE: [EXTERNAL] Cave Lion 5 Federal 2689 TB Liner Inspection
Sent: 7/14/2025 8:10:40 AM

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

Mr. Laird,

As the OCD Permitting website is down for everybody, this email notification will be accepted in lieu of the C-141L. Please proceed with the inspection on Wednesday, July 16th, 2025, at 7:30AM as stated in your email.

Be advised that a C-141L must be submitted in order to submit a closure report. Please submit a C-141L as soon as possible. In one of the free text boxes (either the sampler's information or the directions to the site box) please indicate that the OCD permitting website was down when attempting to submit the 48-hour notification and email notification was submitted instead.

Please include a copy of this email approval in the next submittal for this incident. The copy of the email approval will inform the reviewer of the incident that the emailed notification was approved and will document that your C-141L can be accepted without being submitted within the require 48-hours.

Please do not hesitate to reach out if you have any questions or require additional information.

Thank you,
Brittany Hall • Environmental Field Compliance Supervisor
Environmental Field Compliance Group
EMNRD - Oil Conservation Division
1000 Rio Brazos Road | Aztec, NM 87410
505.517.5333 | Brittany.Hall@emnrd.nm.gov
<http://www.emnrd.nm.gov/ocd/>

Effective 12/1/2024: OCD has updated guidance on karst potential occurrence zones. This notice can be found at: <https://www.emnrd.nm.gov/ocd/ocd-announcements-and-notifications/> under "2024 OCD ANNOUNCEMENTS AND NOTIFICATIONS".

The Digital C-141 guidance documents can be found at <https://www.emnrd.nm.gov/ocd/ocd-announcements-and-notifications/> or <https://www.emnrd.nm.gov/ocd/ocd-forms/>.

From: Wells, Shelly, EMNRD <Shelly.Wells@emnrd.nm.gov>
Sent: Monday, July 14, 2025 7:39 AM
To: Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>; Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>
Subject: FW: [EXTERNAL] Cave Lion 5 Federal 2689 TB Liner Inspection

From: Laird, Jacob <Jacob.Laird@conocophillips.com>
Sent: Monday, July 14, 2025 7:27 AM
To: Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>
Cc: Fejervary Morena, Gustavo A <G.Fejervary@conocophillips.com>
Subject: [EXTERNAL] Cave Lion 5 Federal 2689 TB Liner Inspection

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

To Whom It May Concern,

Below is an email notification for liner inspection at Marathon Oil Permian, LLC (MRO) Cave Lion 5 Federal 2689 TB, Spill Date 05-7-2025 (Incident Number NAPP2512855150). A C-141L was unable to be submitted due to the NMOCD portal being down.

This is a notification that the lined secondary containment will be inspected on Wednesday, July 16th 2025 at 7:30AM. Please call with any questions or concerns 575-703-5482.

Site: Cave Lion 5 Federal 2689 TB
Incident Number: NAPP2512855150

- What is the liner inspection surface area in square feet? 12,263
- Have all impacted materials been removed from the liner? YES
- Liner inspection date? 7/16/2025
- Time liner inspection will commence? 7:30 AM
- Please provide any information necessary for observers? jacob.laird@conocophillips.com

- Please provide any information necessary for navigation to inspection site? Cave Lion 5 Federal 2689 TB (32.0657493, -103.3916158)

I appreciate you,

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

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

QUESTIONS

Action 484389

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 484389
	Action Type: [NOTIFY] Notification Of Liner Inspection (C-141L)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2514026867
Incident Name	NAPP2514026867 SMALLS FED 2H BATTERY @ 0
Incident Type	Produced Water Release
Incident Status	Initial C-141 Approved
Incident Facility	[fAPP2203954141] Smalls Fed 2H Battery

Location of Release Source	
Site Name	Smalls Fed 2H Battery
Date Release Discovered	05/19/2025
Surface Owner	State

Liner Inspection Event Information	
<i>Please answer all the questions in this group.</i>	
What is the liner inspection surface area in square feet	5,841
Have all the impacted materials been removed from the liner	Yes
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	07/16/2025
Time liner inspection will commence	10:30 AM
Please provide any information necessary for observers to liner inspection	jacob.laird@conophillips.com An email notification was submitted to ocd.enviro@emnrd.nm.gov due to the submittal portal being down. Per Brittany Hall, the email notification was accepted as notification. "this email notification will be accepted in lieu of the C-141L. Please proceed with the inspection on Wednesday, July 16th, 2025, at 10:30AM as stated in your email. Be advised that a C-141L must be submitted in order to submit a closure report. Please submit a C-141L as soon as possible. In one of the free text boxes (either the sampler's information or the directions to the site box) please indicate that the OCD permitting website was down when attempting to submit the 48-hour notification and email notification was submitted instead."
Please provide any information necessary for navigation to liner inspection site	32.3560333, -103.47238333

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

CONDITIONS

Action 484389

CONDITIONS




Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 484389
	Action Type: [NOTIFY] Notification Of Liner Inspection (C-141L)

CONDITIONS

Created By	Condition	Condition Date
jlaire	Failure to notify the OCD of liner inspections including any changes in date/time per the requirements of 19.15.29.11.A(5)(a)(ii) NMAC, may result in the inspection not being accepted.	7/14/2025

Appendix B: Photolog

Photographic Log

<p>Facility: Smalls Federal 2H</p> <p>County: Lea County, New Mexico</p> <p>Description: Facility Sign</p>	<p>Date & Time: Wed, Jul 16, 2025 at 10:39:38 MDT Position: +032.356030° / -103.472542° (±11.31ft) Altitude: 3410ft (±9.8ft) Datum: WGS-84 Azimuth/Bearing: 092° S88E 1636mils True (±11°) Elevation Angle: -04.5° Horizon Angle: -01.5° Zoom: 0.5X Smalls Federal 2H</p> 
<p>Facility: Smalls Federal 2H</p> <p>County: Lea County, New Mexico</p> <p>Description: Original Release Photo</p>	
<p>Facility: Smalls Federal 2H</p> <p>County: Lea County, New Mexico</p> <p>Description: View facing Northeast. Liner area near release source (transfer pump)</p>	<p>Date & Time: Wed, Jul 16, 2025 at 10:35:15 MDT Position: +032.355988° / -103.472433° (±11.2ft) Altitude: 3411ft (±9.8ft) Datum: WGS-84 Azimuth/Bearing: 296° N66W 5262mils True (±11°) Elevation Angle: -18.6° Horizon Angle: +01.3° Zoom: 0.5X Smalls Federal 2H</p> 

Facility: Smalls Federal 2H

County: Lea County, New Mexico

Description: View facing North. Lined area in front of production tanks.



Facility: Smalls Federal 2H

County: Lea County, New Mexico

Description: View facing Southeast. Lined area in front of production tanks near release source (transfer pump).



Facility: Smalls Federal 2H

County: Lea County, New Mexico

Description: View facing Southwest. Lined area in front of release source (transfer pump).



Facility: Smalls Federal 2H

County: Lea County, New Mexico

Description: View facing North. Liner area behind production tanks.



Facility: Smalls Federal 2H

County: Lea County, New Mexico

Description: View facing North. Lined area between production tanks.



Facility: Smalls Federal 2H

County: Lea County, New Mexico

Description: View facing South. Lined area between production tanks.



Facility: Smalls Federal 2H

County: Lea County, New Mexico

Description: View facing North. Lined area in front of production tanks.



Facility: Smalls Federal 2H

County: Lea County, New Mexico

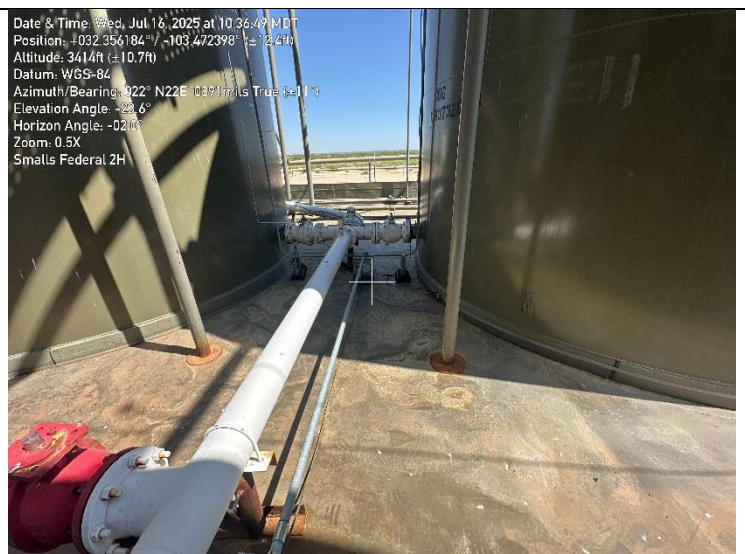
Description: View facing North. Lined area behind production tanks.



Facility: Smalls Federal 2H

County: Lea County, New Mexico

Description: View facing North. Lined area between production tanks.



Facility: Smalls Federal 2H

County: Lea County, New Mexico

Description: View facing South. Lined area in front of production tanks.



Facility: Smalls Federal 2H

County: Lea County, New Mexico

Description: View facing East. Lined area at the back of production tanks



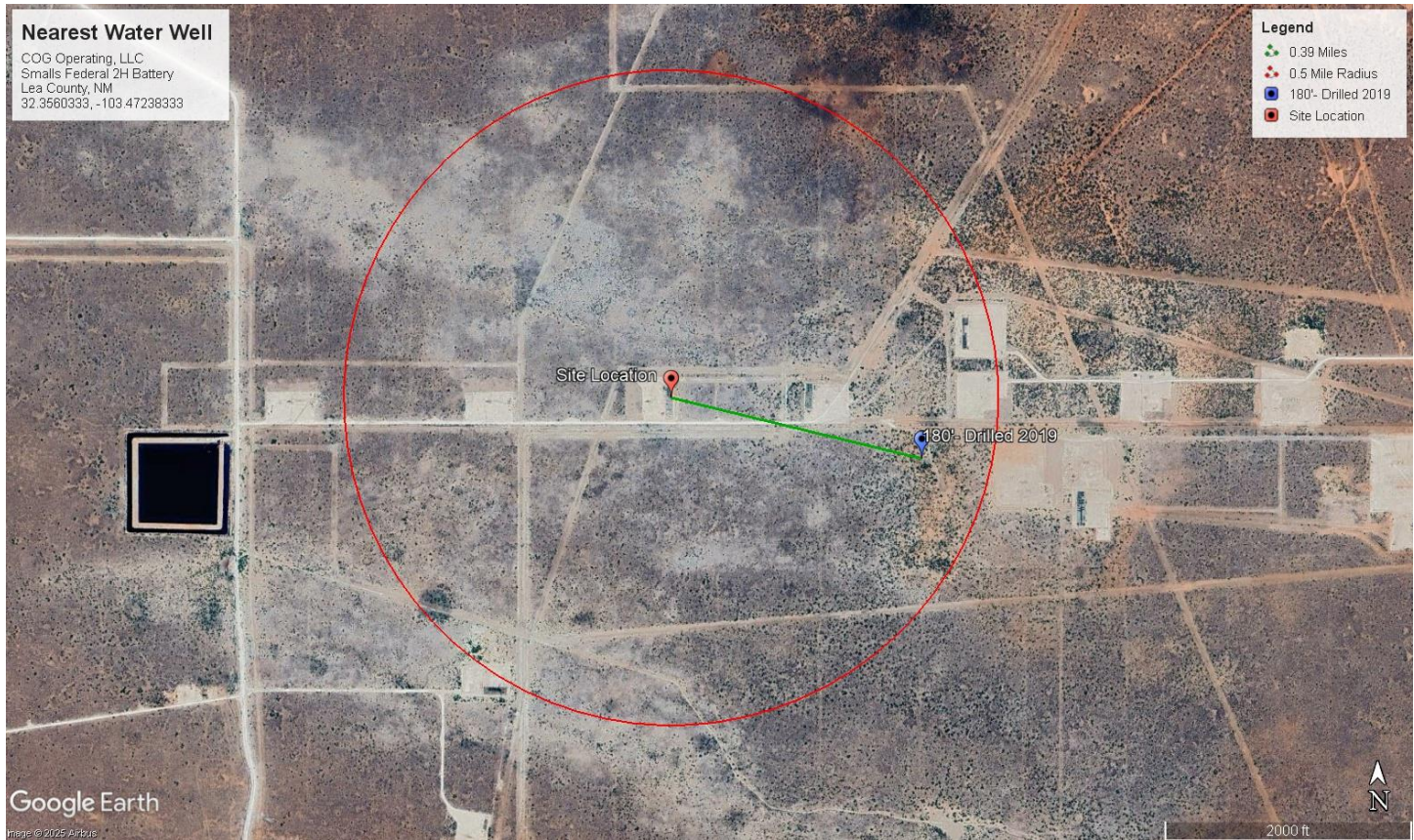
Facility: Smalls Federal 2H

County: Lea County, New Mexico

Description: View facing East. Lined area at the back of production tanks



Appendix C: Site Characterization and Ground Water



Neatest Water Well Map

COG Operating, LLC
Smalls Federal 2H Battery
Lea County, New Mexico
32.3560333, -103.47238333



New Mexico Office of the State Engineer

Water Column/Average Depth to Water

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

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

(quarters are smallest to largest)

(meters)

(In feet)

POD Number	Code	Sub basin	County	Q64	Q16	Q4	Sec	Tws	Range	X	Y	Map	Distance	Well Depth	Depth Water	Water Column
CP 01803 POD1		CP	LE	NW	NW	NW	34	22S	34E	644356.8	3580786.1		633	240	180	60
CP 01826 POD1		CP	LE	NW	NW	NW	34	22S	34E	644379.1	3580778.4		657	698	180	518
CP 01740 POD1		CP	LE	NW	NW	NW	34	22S	34E	644401.8	3580765.5		682	600	560	40

Average Depth to Water: 306 feet

Minimum Depth: 180 feet

Maximum Depth: 560 feet

Record Count: 3

Basin/County Search:

County: LE

UTM Filters (in meters):

Easting: 643738.57

Northing: 3580926.02

Radius: 804

* UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

quarters are 1=NW 2=NE 3=SW 4=SE
quarters are smallest to largest

NAD83 UTM in meters

Well Tag	POD Nbr	Q64	Q16	Q4	Sec	Tws	Rng	X	Y	Map
22473	CP 01803 POD1	NW	NW	NW	34	22S	34E	644356.8	3580786.1	

* UTM location was derived from PLSS - see Help

Driller License:	1706	Driller Company:	SUPERIOR DRILLING, LLC
Driller Name:	WALLACE, BRYCE J.LEE.NER		
Drill Start Date:	2019-11-04	Drill Finish Date:	2019-11-06
Log File Date:	2020-02-03	PCW Rcv Date:	
Pump Type:		Pipe Discharge Size:	
Casing Size:	4.00	Depth Well:	240
		Depth Water:	180

Water Bearing Stratifications:

Top	Bottom	Description
85	205	Sandstone/Gravel/Conglomerate

Casing Perforations:

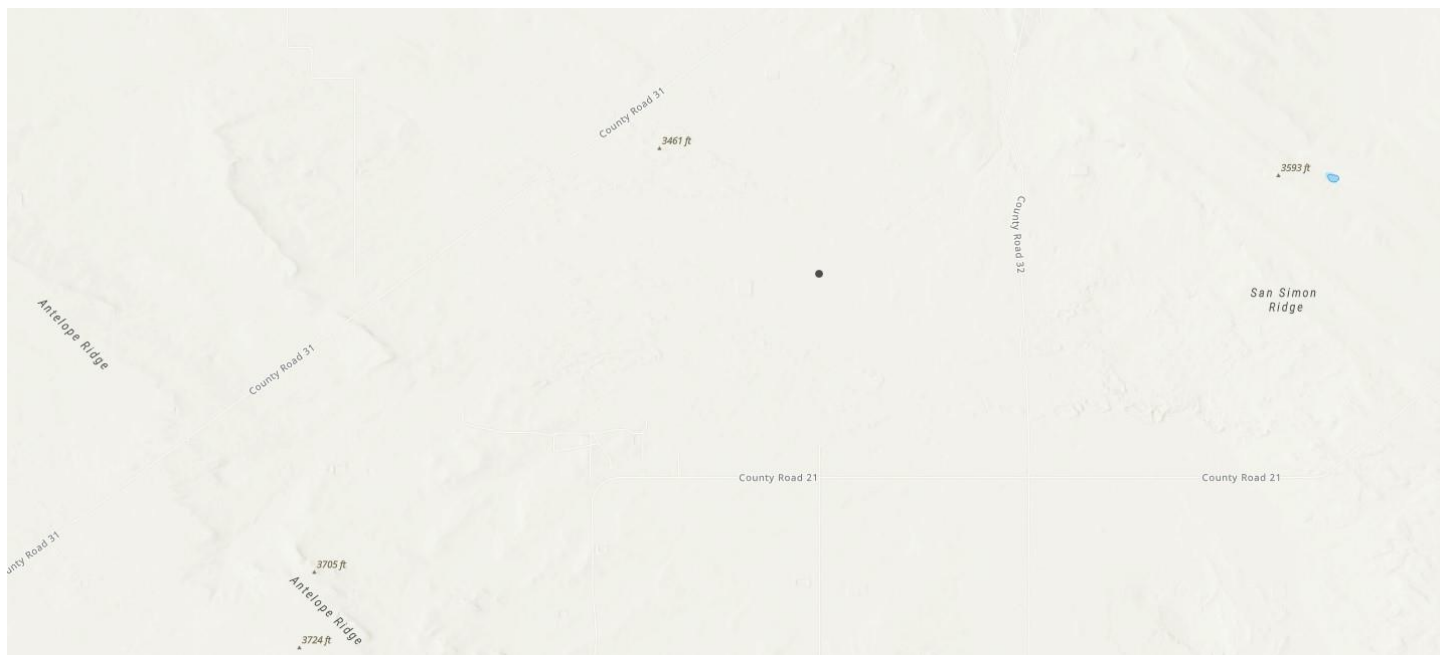
Top	Bottom
160	240

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.



Karst Map

COG Operating, LLC
Smalls Federal 2H Battery
Lea County, New Mexico
32.3560333, -103.47238333



Hydrology Map

COG Operating, LLC
Squints Federal 27M CTB
Lea County, New Mexico
32.35712778, -103.4645278

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QUESTIONS

Action 498368

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 498368
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2514026867
Incident Name	NAPP2514026867 SMALLS FED 2H BATTERY @ FAPP2203954141
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Facility	[fAPP2203954141] Smalls Fed 2H Battery

Location of Release Source*Please answer all the questions in this group.*

Site Name	Smalls Fed 2H Battery
Date Release Discovered	05/19/2025
Surface Owner	State

Incident Details*Please answer all the questions in this group.*

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

Nature and Volume of Release*Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.*

Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Equipment Failure Pump Produced Water Released: 35 BBL Recovered: 34 BBL Lost: 1 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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Oil Conservation Division
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QUESTIONS, Page 2

Action 498368

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 498368
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.	

Initial Response

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

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

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

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

I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 06/11/2025
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QUESTIONS, Page 3

Action 498368

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 498368
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

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	NM OSE iWaters Database Search
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	Greater than 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Greater than 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Greater than 5 (mi.)
Any other fresh water well or spring	Greater than 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Greater than 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	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	Yes
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
On what estimated date will the remediation commence	05/19/2025
On what date will (or did) the final sampling or liner inspection occur	07/16/2025
On what date will (or was) the remediation complete(d)	07/16/2025
What is the estimated surface area (in square feet) that will be remediated	5841
What is the estimated volume (in cubic yards) that will be remediated	0
<i>These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.</i>	
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 4

Action 498368

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 498368
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Remediation Plan (continued)	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:	
<i>(Select all answers below that apply.)</i>	
Is (or was) there affected material present needing to be removed	Yes
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	Not answered.
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 08/22/2025
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 6

Action 498368

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 498368
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	484389
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	07/16/2025
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	5841

Remediation Closure Request

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

Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
What was the total surface area (in square feet) remediated	5841
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	Liner integrity inspection activities were conducted following a release of produced water within a lined containment at the Site. Upon inspection, no rips, tears, holes, or damage was observed, and the liner was determined to be sufficient. The release was contained laterally by the lined containment and the liner was performing as designed.

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (in .pdf format) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 08/22/2025
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CONDITIONS

Action 498368

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 498368
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
scott.rodgers	App ID 498368 Liner Inspection approved	10/1/2025