

2135 S. Loop 250 W.
Midland, Texas 79703
United States
www.ghd.com

Our Ref.: 12694784 – NMOCD – 1

April 23, 2026

New Mexico Oil Conservation Division
506 W. Texas Avenue
Artesia, New Mexico 88210

Closure Report
COG OPERATING, LLC
Daisy State 24D CTB
Unit Letter D, Section 24, T25S, R27E
GPS: 32.1208, -104.148635
Eddy County, New Mexico

1. Introduction

GHD Services Inc. (GHD), on behalf of COG Operating, LLC (COG), has prepared this *Closure Report* to document site assessment activities at Daisy State 24D CTB (Site). The purpose of the assessment was to determine the presence or absence of impacts to soil following a release of produced water within a lined containment at the Site. Based on field observations, COG is submitting this *Closure Report*, describing Site assessment activities that have occurred and requesting closure for Incident Number nAPP2608540022.

2. Site Description and Release Summary

The Site is in Unit D, Section 24, Township 25 South, Range 27 East, in Eddy County, New Mexico (32.1208° N, -104.148635° W) and is associated with oil and gas exploration and production operations on State Land. On March 14, 2026, approximately 10 barrels (bbls) of produced water were released into the lined secondary containment. A vacuum truck was dispatched to the Site to recover free-standing fluids; 10 bbls of released produced water was recovered from within the lined containment. The release was reported to the New Mexico Oil Conservation Division (NMOCD) on March 26, 2026, and was subsequently assigned Incident Number nAPP2608540022.

3. Site Characterization and Closure Criteria

The Site was characterized to assess applicability of Table I, Closure Criteria for Soils Impacted by a Release, of Title 19, Chapter 15, Part 29 (NMAC 19.15.29) of the New Mexico Administrative Code (NMAC). Results from the characterization desktop review are summarized below and a Site Map is presented in **Figure 1**.

According to the soil survey provided by the United States Department of Agriculture National Resources Conservation Services, the soils located within the Site consists of Reeves-Reagan loams, 0 to 3 percent slopes. The Site is located within an area of high karst potential.

Depth to groundwater at the Site is estimated to be less than 50 feet below ground surface (ft bgs) based on the nearest groundwater well data. Groundwater was determined utilizing the New Mexico Office of the State Engineers (NMOSE) database for registered water wells. The nearest permitted groundwater well with depth to groundwater data is POD C-3938, located approximately 1.19 miles southeast of the Site. The well was completed to a depth of 21 ft bgs on March 8, 2016, with a static water level of 12 ft bgs after completion. A copy of the well referenced record is included in **Attachment A**.

The Site is not within 300 feet of any continuously flowing watercourse or any other significant watercourse, the nearest is 0.5 miles south. There are no lakebeds, sinkholes or playa lakes within 200 feet of the Site, the closest playa is approximately 1.03 miles southwest of the Site. There are no permanent residences, schools, hospitals, institutions or churches within 300 feet of the Site, the closest residence is greater than 5 miles from the Site. The nearest fresh water well utilized for livestock watering is 0.79 miles southwest of the Site. There are no wetlands within 300 feet of the Site, the nearest is 0.53 miles south. There are no subsurface mines or 100-year floodplains within 300 feet of the Site, the nearest floodplain is 0.37 miles south. The location of the Site is depicted in **Figure 1**. A detailed map of the Site is provided in **Figure 2**. The Site Characterization Documentation is included in **Attachment B**.

Based on the results of the Site Characterization desktop review and having the Site within a high karst area, the following NMOCD Table I Closure Criteria (Closure Criteria) apply:

Table 3.1 Closure Criteria for Soils Impacted by a Release (NMAC 19.15.29.12)

Regulatory Standard	Benzene (mg/kg)	BTEX (mg/kg)	TPH (GRO+DRO) (mg/kg)	TPH (GRO+DRO+MRO) (mg/kg)	Chloride (mg/kg)
19.15.29.12 NMAC Table I Closure Criteria for Soils Impacted by a Release.	10	50	---	100	600
Notes: --- = not defined. mg/kg = milligrams per kilogram. TPH = total petroleum hydrocarbons. GRO+DRO+MRO = Gasoline Range Organics + Diesel Range Organics + Motor Oil/Lube Range Organics. BTEX = benzene, toluene, ethylbenzene, and xylene.					

4. Site Assessment Activities

The liner inspection notice was provided on April 15, 2026. A liner integrity inspection was performed on April 20, 2026. The liner was visually inspected and no rips, tears, holes, or damage in the liner was observed. The liner was determined to be intact with no integrity issues. Photographic documentation of the liner inspection is presented in **Attachment C**.

5. Closure Request

Based on the liner inspection and assessment activities at the Site, COG respectfully requests that no further actions be required, and requests closure for Incident Number nAPP2608540022 be granted.

Should you have any questions or require further information regarding this report, please do not hesitate to contact the undersigned.

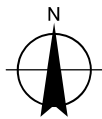
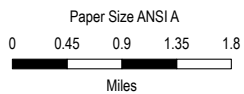
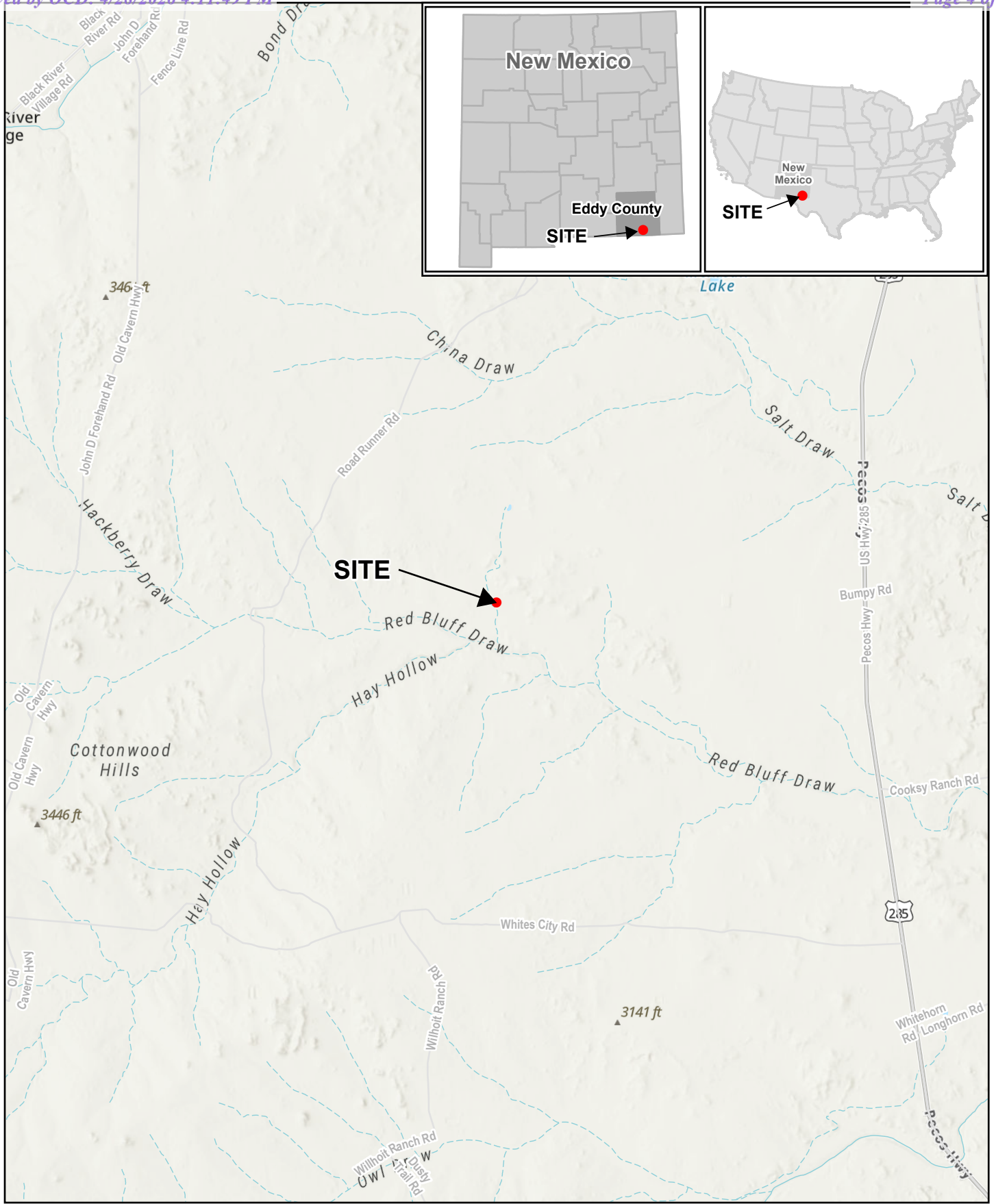
Regards,

Kayla Taylor
Senior Project Manager
+1 432 210-5443
kayla.taylor@ghd.com

Scott Foord
Project Director
+1 281 725-7477
william.foord@ghd.com

KT/mss/1/S4

Encl.: Figure 1 - Site Location Map
 Figure 2 - Site Details Map
 Attachment A - Referenced Well Records
 Attachment B - Site Characterization Documentation
 Attachment C - Photographic Documentation



COG OPERATING LLC
 EDDY COUNTY, NEW MEXICO
 DAISY STATE 24D CTB
 NAPP2608540022

Project No. 12694784
 Revision No. -
 Date Apr 22, 2026

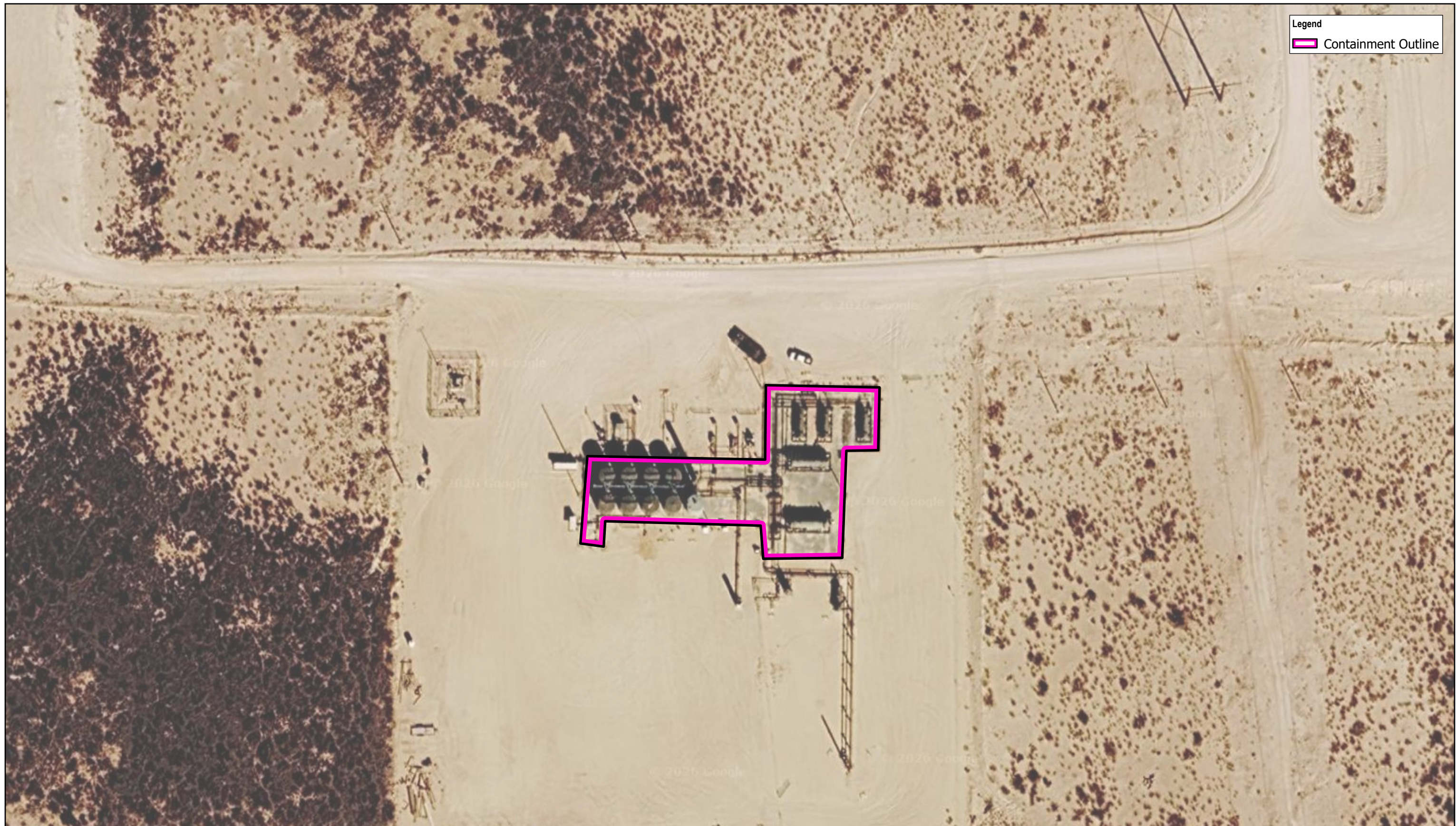
Map Projection: Transverse Mercator
 Horizontal Datum: NAD 1983 2011
 Grid: NAD 1983 2011 StatePlane New Mexico East FIPS 3001 Ft US

SITE LOCATION MAP

FIGURE 1

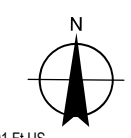
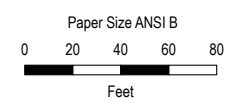
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 Print date: 22 Apr 2026 - 11:45

Data source: World Topographic Map; Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community
 World Hillshade: Esri, NASA, NGA, USGS. Created by: jplaster



Legend

Containment Outline



Map Projection: Transverse Mercator
 Horizontal Datum: NAD 1983 2011
 Grid: NAD 1983 2011 StatePlane New Mexico East FIPS 3001 Ft US

COG OPERATING LLC
EDDY COUNTY, NEW MEXICO
DAISY STATE 24D CTB
NAPP2608540022

Project No. **12694784**
 Revision No. -
 Date **Apr 22, 2026**

SITE DETAILS

FIGURE 2

Q:\GIS\PROJECTS\12694000s\12694784\GIS\Maps\Deliverables\Containment\Figures\12694784_Containment_001.aprx - 12694784_002_SiteDetails
 Print date: 22 Apr 2026 - 11:47
 Data source: World Hillshade; Sources: Esri, Vantor, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geotaststyrselen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap, and the GIS user community
 Google Maps Sat: © OpenStreetMap (and) contributors, CC-BY-SA
 World Topographic Map: Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community. Created by: jppaster

Attachment A

Referenced Well Records



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
C 03938 POD1		CUB	ED	NE	NE	NE	25	25S	27E	581481.8	3552616.2	●	1923	21	12	9
C 03861 POD1		C	ED	SE	NE	SW	18	25S	28E	582265.7	3554864.3	●	2082	91	63	28
C 04892 POD1		CUB	ED	SW	SW	SW	07	25S	28E	581666.6	3556038.9	●	2330	95		
C 03262 POD1		CUB	ED	NE	NW	NE	22	25S	27E	577837.0	3554244.0 *	●	2476	75		
C 04371 POD1		CUB	ED	SW	SW	SE	26	25S	27E	579368.8	3551272.6	●	3021	100	69	31
C 03263 POD1		CUB	ED	NW	NW	NW	07	25S	28E	581628.0	3557501.0 *	●	3606	133		
C 01573 POD1		C	ED	SW	NW	SE	20	25S	28E	584143.9	3553361.5	●	3911	176	96	80

Average Depth to Water: **60 feet**

Minimum Depth: **12 feet**

Maximum Depth: **96 feet**

Record Count: 7

Basin/County Search:

Basin: C

County: ED

UTM Filters (in meters):

Easting: 580311.66

Northing: 3554142.86

Radius: 4000

* 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.



WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

www.ose.state.nm.us

STATE ENGINEER OFFICE
SOSWELL, NEW MEXICO

2016 MAR 22 PM 1:14

1. GENERAL AND WELL LOCATION	OSE POD NUMBER (WELL NUMBER) CROSSMAN ST 25 #1 TW-1			OSE FILE NUMBER(S) C-3938			
	WELL OWNER NAME(S) CONCHO OPERATING, LLC			PHONE (OPTIONAL)			
	WELL OWNER MAILING ADDRESS 600 W ILLINOIS AVE			CITY MIDLAND	STATE TX	ZIP 79701	
	WELL LOCATION (FROM GPS)	DEGREES LATITUDE 32	MINUTES 06	SECONDS 25.0	N	* ACCURACY REQUIRED: ONE TENTH OF A SECOND * DATUM REQUIRED: WGS 84	
LONGITUDE 104						10.9	W
DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS - PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE CORNER OF HWY 285 & BUMPY RD GO W 2.6 MI TO INTERSEC. SW ON CALICHE RD 1.3 MILES TO CROSSMAN WELL 25 #1							

2. DRILLING & CASING INFORMATION	LICENSE NUMBER WD-1711	NAME OF LICENSED DRILLER EDWARD BRYAN			NAME OF WELL DRILLING COMPANY STRAUB CORPORATION			
	DRILLING STARTED 3-8-16	DRILLING ENDED 3-8-16	DEPTH OF COMPLETED WELL (FT) 21'	BORE HOLE DEPTH (FT) 21'	DEPTH WATER FIRST ENCOUNTERED (FT) N/A			
	COMPLETED WELL IS: <input type="checkbox"/> ARTESIAN <input type="checkbox"/> DRY HOLE <input checked="" type="checkbox"/> SHALLOW (UNCONFINED)				STATIC WATER LEVEL IN COMPLETED WELL (FT) 12'			
	DRILLING FLUID: <input type="checkbox"/> AIR <input checked="" type="checkbox"/> MUD ADDITIVES - SPECIFY:							
	DRILLING METHOD: <input checked="" type="checkbox"/> ROTARY <input type="checkbox"/> HAMMER <input type="checkbox"/> CABLE TOOL <input type="checkbox"/> OTHER - SPECIFY:							
	DEPTH (feet bgl)		BORE HOLE DIAM (inches)	CASING MATERIAL AND/OR GRADE (include each casing string, and note sections of screen)	CASING CONNECTION TYPE	CASING INSIDE DIAM. (inches)	CASING WALL THICKNESS (inches)	SLOT SIZE (inches)
	FROM	TO						
	21'	6'	6"	SCH 40.010 SCREEN	FJ	2"	0.154	.010
	6'	+43	6"	SCH 40 SCREEN	FJ	2"	0.154	RISER

3. ANNULAR MATERIAL	DEPTH (feet bgl)		BORE HOLE DIAM. (inches)	LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL	AMOUNT (cubic feet)	METHOD OF PLACEMENT
	FROM	TO				
	21'	4'	6"	7 BAGS OF 20/40 SAND		TOPLoad
	4'	2'	6"	1 BAG OF 3/8 HOLEPLUG		TOPLoad
	2'	0	6"	1 BAG OF 5% CEMENT GROUT		TOPLoad

FOR OSE INTERNAL USE		WR-20 WELL RECORD & LOG (Version 10/29/15)	
FILE NUMBER	C-3938	POD NUMBER	1
LOCATION	25S.27E.25.2.2.2	TRN NUMBER	583399
			MONITOR
			PAGE 1 OF 2

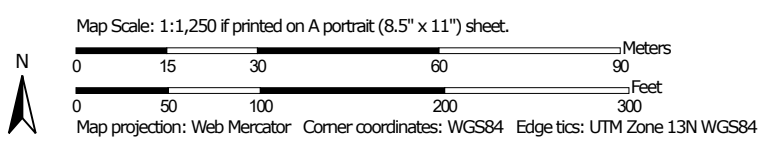
Attachment B

Site Characterization Documentation

Soil Map—Eddy Area, New Mexico (Soil Map)




Soil Map may not be valid at this scale.



Soil Map—Eddy Area, New Mexico
(Soil Map)


MAP LEGEND

Area of Interest (AOI)

 Area of Interest (AOI)




















Soils






 Soil Map Unit Polygons

 Soil Map Unit Lines


 Soil Map Unit Points

Special Point Features






-  Blowout
-  Borrow Pit
-  Clay Spot
-  Closed Depression
-  Gravel Pit
-  Gravelly Spot
-  Landfill
-  Lava Flow
-  Marsh or swamp
-  Mine or Quarry
-  Miscellaneous Water
-  Perennial Water
-  Rock Outcrop
-  Saline Spot
-  Sandy Spot
-  Severely Eroded Spot
-  Sinkhole
-  Slide or Slip
-  Sodic Spot

-  Spoil Area
-  Stony Spot
-  Very Stony Spot
-  Wet Spot
-  Other
-  Special Line Features


Water Features

 Streams and Canals

Transportation

-  Rails
-  Interstate Highways
-  US Routes
-  Major Roads
-  Local Roads

Background

 Aerial Photography

MAP INFORMATION

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

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

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

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

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

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

Soil Survey Area: Eddy Area, New Mexico
Survey Area Data: Version 21, Sep 9, 2025

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

Date(s) aerial images were photographed: Mar 22, 2025—Apr 12, 2025

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



Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
RM	Reeves-Reagan loams, 0 to 3 percent slopes	7.1	100.0%
Totals for Area of Interest		7.1	100.0%



Eddy Area, New Mexico

RM—Reeves-Reagan loams, 0 to 3 percent slopes

Map Unit Setting

National map unit symbol: 1w5g

Landscape: Uplands

Elevation: 1,100 to 4,400 feet

Mean annual precipitation: 7 to 25 inches

Mean annual air temperature: 57 to 70 degrees F

Frost-free period: 200 to 240 days

Farmland classification: Not prime farmland

Map Unit Composition

Reeves and similar soils: 50 percent

Reagan and similar soils: 35 percent

Minor components: 15 percent

Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Reeves

Setting

Landscape: Uplands

Landform: Gypsum hills, Gypsum plains, Gypsum ridges

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

Landform position (three-dimensional): Side slope, head slope, nose slope, crest

Down-slope shape: Convex

Across-slope shape: Linear

Parent material: Residuum weathered from gypsum

Typical profile

H1 - 0 to 8 inches: loam

H2 - 8 to 32 inches: clay loam

H3 - 32 to 60 inches: gypsiferous material

Properties and qualities

Slope: 0 to 1 percent

Depth to restrictive feature: More than 80 inches

Drainage class: Well drained

Runoff class: Low

Capacity of the most limiting layer to transmit water (Ksat): Very low to moderately low (0.00 to 0.06 in/hr)

Depth to water table: More than 80 inches

Frequency of flooding: None

Frequency of ponding: None

Calcium carbonate, maximum content: 25 percent

Gypsum, maximum content: 80 percent

Maximum salinity: Very slightly saline to moderately saline (2.0 to 8.0 mmhos/cm)

Sodium adsorption ratio, maximum: 4.0
Available water supply, 0 to 60 inches: Low (about 4.3 inches)

Interpretive groups

Land capability classification (irrigated): 3s
Land capability classification (nonirrigated): 7s
Hydrologic Soil Group: B
Ecological site: R070BC007NM - Loamy
Hydric soil rating: No

Description of Reagan**Setting**

Landscape: Uplands
Landform: Alluvial fans, Fan remnants
Landform position (three-dimensional): Rise
Down-slope shape: Linear, convex
Across-slope shape: Linear
Parent material: Alluvium and/or eolian deposits

Typical profile

H1 - 0 to 8 inches: loam
H2 - 8 to 30 inches: loam
H3 - 30 to 82 inches: clay loam

Properties and qualities

Slope: 0 to 3 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Well drained
Runoff class: High
Capacity of the most limiting layer to transmit water (Ksat):
Moderately high to high (0.60 to 2.00 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Calcium carbonate, maximum content: 50 percent
Maximum salinity: Very slightly saline to moderately saline (2.0 to 8.0 mmhos/cm)
Sodium adsorption ratio, maximum: 15.0
Available water supply, 0 to 60 inches: Moderate (about 8.2 inches)

Interpretive groups

Land capability classification (irrigated): 2e
Land capability classification (nonirrigated): 6e
Hydrologic Soil Group: B
Ecological site: R070BC007NM - Loamy
Hydric soil rating: No

Minor Components**Cottonwood**

Percent of map unit: 5 percent
Ecological site: R070BB006NM - Gyp Upland

Map Unit Description: Reeves-Reagan loams, 0 to 3 percent slopes---Eddy Area, New Mexico

Soil Description

Hydric soil rating: No

Gypsum land

Percent of map unit: 5 percent

Hydric soil rating: No

Upton

Percent of map unit: 5 percent

Ecological site: R070BC025NM - Shallow

Hydric soil rating: No

Data Source Information

Soil Survey Area: Eddy Area, New Mexico

Survey Area Data: Version 21, Sep 9, 2025

Karst Potential



4/21/2026, 4:36:33 PM

Karst Occurrence Potential ■ Medium
■ High

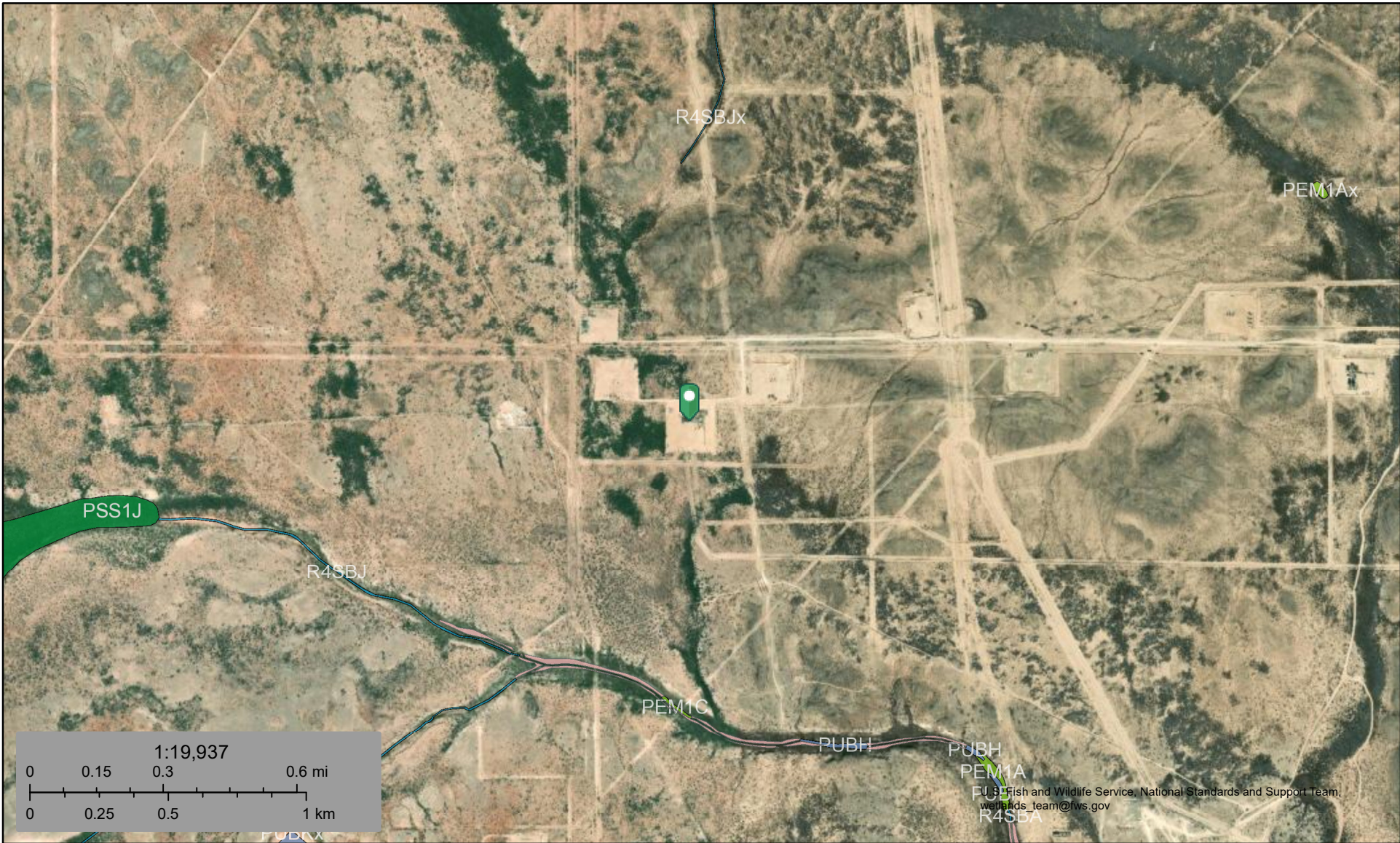
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0 0.05 0.1 0.2 mi
0 0.1 0.2 0.4 km
Esri, HERE, Garmin, IPC, BLM, OCD, New Mexico Tech, Vantor

New Mexico Oil Conservation Division
NM OCD Oil and Gas Map. <http://nm-emnrd.maps.arcgis.com/apps/webappviewer/index.html?id=4d017f2306164de29fd2fb9f935ca75>: New Mexico Oil Conservation Division







U.S. Fish and Wildlife Service
National Wetlands Inventory

Wetlands



April 21, 2026

Wetlands

- | | | | | | |
|---|--------------------------------|---|-----------------------------------|---|----------|
|  | Estuarine and Marine Deepwater |  | Freshwater Emergent Wetland |  | Lake |
|  | Estuarine and Marine Wetland |  | Freshwater Forested/Shrub Wetland |  | Other |
|  | Freshwater Pond |  | |  | 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



104°9'14"W 32°7'30"N



Legend

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

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR Regulatory Floodway

OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D

OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
		Area of Undetermined Flood Hazard Zone D

GENERAL STRUCTURES		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall

OTHER FEATURES		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
		17.5 Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
		Profile Baseline
		Hydrographic Feature

MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped



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

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

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 4/21/2026 at 11:15 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.



1:6,000

104°8'36"W 32°7'N

Attachment C

Photographic Documentation

COG Operating, LLC
Daisy State 24D CTB
Incident No. naPP2608540022
Eddy County, New Mexico



Photo 1 View of facility sign.

Photo 2 View of northwest corner of containment.



Photo 3 View of containment towards northeast.

Photo 4 View of containment towards east.

COG Operating, LLC
Daisy State 24D CTB
Incident No. naPP2608540022
Eddy County, New Mexico



Photo 5 View of containment towards east.

Photo 6 View of containment towards west.

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 575610

QUESTIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 575610
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2608540022
Incident Name	NAPP2608540022 DAISY STATE 24D CTB @ FAPP2203350881
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Facility	[fAPP2203350881] DAISY 24 STATE COM BATTERY

Location of Release Source	
<i>Please answer all the questions in this group.</i>	
Site Name	DAISY STATE 24D CTB
Date Release Discovered	03/14/2026
Surface Owner	State

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

Nature and Volume of Release	
<i>Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.</i>	
Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Normal Operations Tank (Any) Produced Water Released: 10 BBL Recovered: 10 BBL Lost: 0 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 575610

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 575610
	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	No
Reasons why this would be considered a submission for a notification of a major release	<i>Unavailable.</i>

With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.

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	<i>Not answered.</i>

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

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

I hereby agree and sign off to the above statement	Name: Jacqui Harris Title: Sr Environment Engineer Email: jacqui.harris@conocophillips.com Date: 04/28/2026
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Sante Fe Main Office
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QUESTIONS, Page 3

Action 575610

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 575610
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Site Characterization

Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Less than or equal 25 (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	Between ½ and 1 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	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 ½ and 1 (mi.)
Any other fresh water well or spring	Between ½ and 1 (mi.)
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	High
A 100-year floodplain	Between 1000 (ft.) and ½ (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan

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

Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
On what estimated date will the remediation commence	03/14/2026
On what date will (or did) the final sampling or liner inspection occur	04/20/2026
On what date will (or was) the remediation complete(d)	04/20/2026
What is the estimated surface area (in square feet) that will be remediated	11000
What is the estimated volume (in cubic yards) that will be remediated	0

These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed. The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

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QUESTIONS, Page 4

Action 575610

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 575610
	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: Jacqui Harris Title: Sr Environment Engineer Email: jacqui.harris@conocophillips.com Date: 04/28/2026
<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 575610

QUESTIONS (continued)

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 575610
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	576039
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	04/20/2026
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	11000

Remediation Closure Request	
<i>Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.</i>	
Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
What was the total surface area (in square feet) remediated	11000
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	Liner Inspected

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: Jacqui Harris Title: Sr Environment Engineer Email: jacqui.harris@conocophillips.com Date: 04/28/2026
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CONDITIONS

Action 575610

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 575610
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
michael.buchanan	Liner inspection and closure approved. It is noted that sediment and sand appear to cover corners and parts of the liner sporadically. Future closure reports submitted without full visibility of the liner may result in rejection.	5/7/2026