

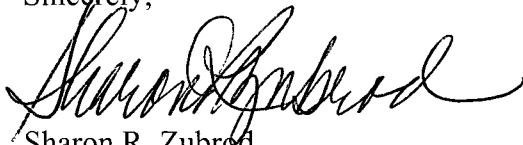
potential causes, take pictures for our records, and evaluate future mitigation efforts that could be implemented that would prevent similar circumstances from developing in the future.

On June 7, 2007 the reserve pit for the Hare #14-M was closed. At that time, COPC's construction representative and its contractor, JD Ritter Construction, who completed the pit closure and site interim reclamation, reported the liner was in *good* condition. That report is consistent with our last internal report dated May 19, 2007 (less than three weeks old) on the condition of the liner. In other words, we have no record of any liner deficiencies affecting the Hare #14-M between May 19, 2007, when the liner was repaired, and June 7, 2007, when the liner was reported to be in good condition immediately prior to the pit being closed.

In sum, our review of this situation simply does not support NMOCD's issuance of an NOV. Not only does our information directly contradict the NOV's claim that the pit liner for the Hare #14-M was torn and collapsed into the pit below the field level, but the opportunity for us to promptly and fairly evaluate the situation immediately after NMOCD's claimed discovery of the deficient liner no longer exists. If NMOCD has definitive information, such as digital photographs that supports the claim in the NOV then we request that information be made available to us immediately for review. Otherwise, we respectfully request NMOCD to reconsider whether the NOV is appropriate.

We are prepared to discuss this situation further, if necessary, at the administrative conference with NMOCD scheduled for July 18, 2007, but we hope to hear back from you before that date.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sharon R. Zubrod', written in a cursive style.

Sharon R. Zubrod
Regulatory Compliance Manager
ConocoPhillips Company

Cc: BLM – Steve Henke
COPC – John Zent, Jim Vaiana