

PHONE (575) 397-6388 • FAX (575) 397- 0397 • 1324 W. MARLAND • P.O. BOX 805 • HOBBS, NM 88241-0805 E-MAIL: cbrunson@bbcinternational.com

DELINEATION WORKPLAN

COG – SRO STATE COM #060H BATTERY (Leak Date: 5/3/18)

RP # 2RP-4740 API # 30-015-41741

This delineation workplan and remediation proposal addresses the release associated with RP # 2RP-4740.

The following information includes:

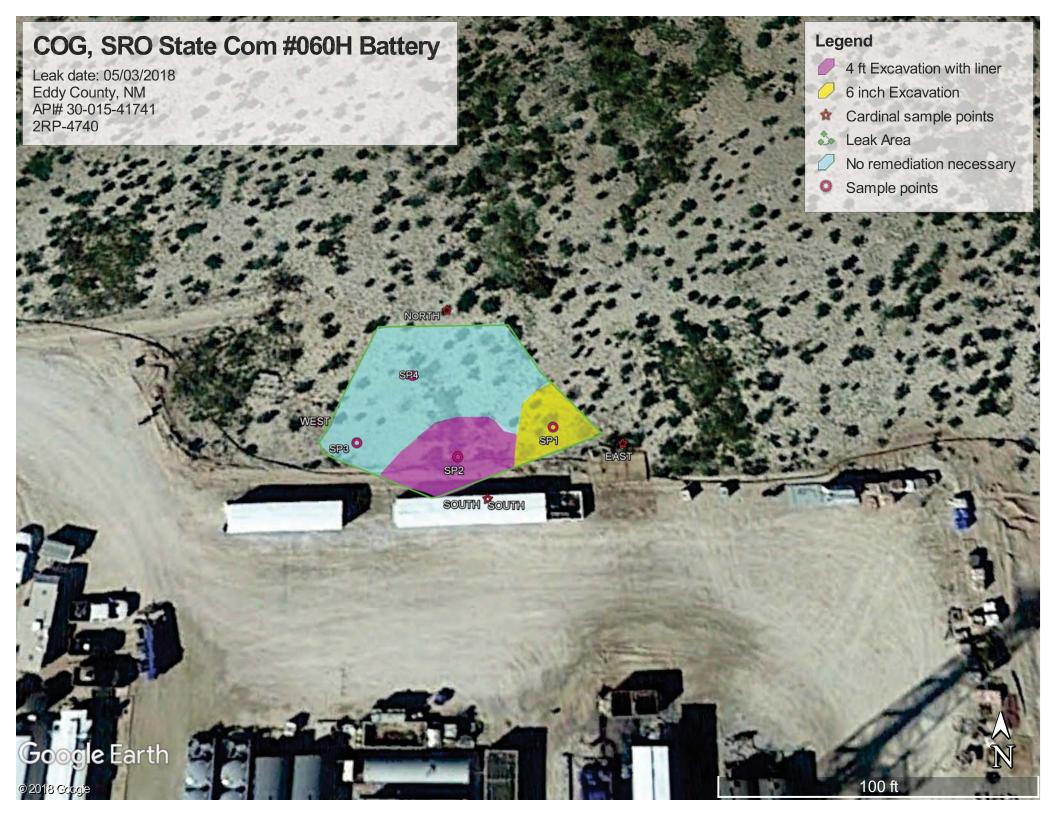
- 1. Scaled digital site map with spill area demarcated and leak point identified along with sample point locations and areas of remediation at appropriate depths.
- 2. GPS information for sample points and sample methodology
- 3. Depth to groundwater information (i.e., pdf of OSE search results and/or copy of Chevron groundwater trend map).
- 4. Laboratory analysis results summary table and original laboratory analysis reports
- 5. A copy of the initial C-141
- 6. Potentially other pertinent information as necessary for site specific purposes.

Based on the information included in this package and the NMOCD guidelines, the following remediation is proposed:

COG will excavate the spill area as depicted on the following site diagram. The leak area near SP1 (yellow shade on diagram) will be excavated to a depth of 6 inches. The leak area near SP2 (pink shade on diagram) will be excavated to a depth of 4 feet with an impermeable liner placed in the bottom of the excavation. The leak area near SP3 and SP4 (blue shade on diagram) will not require any remediation.

The entire site will then be backfilled with clean soil and revegetated (if warranted) to the standards of the appropriate regulatory agency or private surface owner.

All excavated materials will be disposed of at an NMOCD-approved disposal facility.





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New Mexico State Land Office Revegetation and Noxious Weed Management Plan

COG – SRO State Com #006H Battery

Revegetation Plan

Disturbed areas associated with the remediation efforts will be reseeded. If after one growing season, the vegetation has not taken hold, seeding may need to be repeated until revegetation is successful, as determined by the State Land Office. The seed will be spread by either using a hand-held broadcaster or tractor-mounted broadcaster and the area will be raked or dragged to cover the seed. Since the seed will be broadcast, the pounds per acre will be double over the amount used by drill planting.

The seed mixture will be the appropriate mixture for the specific site and planted in the required amounts of pounds pure live seed (PLS) per acre. Commercially sold seed will be either certified or registered and will not contain primary or secondary noxious weeds.

Gramma grass – 40% - 1.5 lbs. PLS Buffalo grass – 40% - 1.5 lbs. PLS Side oats – 10% - 0.5% lbs. PLS Four wing Salt bush – 10% - 1.5 lbs. PLS

Noxious Weed Management Plan

The site will be visited to assess the establishment of vegetative growth. Personnel performing the site visit will also look for the presence of noxious weeds at the site as indicated on the New Mexico Noxious Weeds List specified on the United States Department of Agriculture website. If a noxious weed is observed at the site, the NMSLO will be contacted to determine the most effective manner to eradicate it.

COG, SRO State Com #060H Battery

Sample points

SP1, N 32.05827 W-104.06768

SP2, N 32.05824 W-104.06779

SP3, N 32.05826 W-104.06790

SP4, N 32.05833 W-104.06784

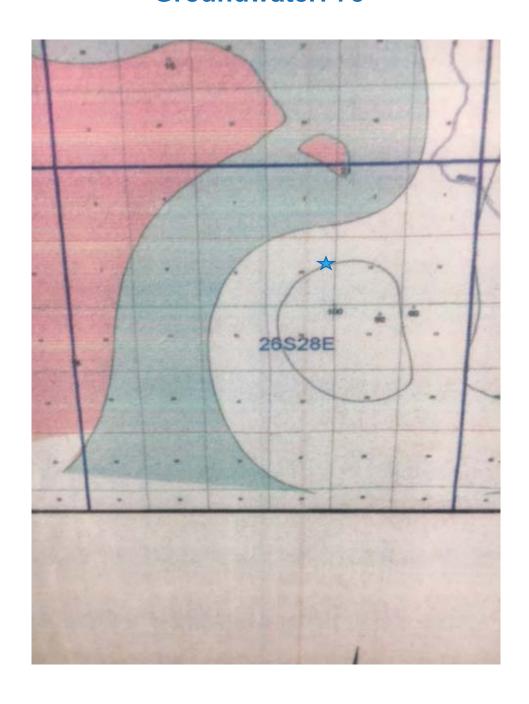
NORTH, N 32.05840 W-104.06781

SOUTH, N 32.05820 W-104.06775

EAST, N 32.05826 W-104.06760

WEST, N 32.05828 W-104.06795

COG, SRO State Com #060H Battery U/L H, Section 10, T26S, R28E Groundwater: 75'





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 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest) (NAD83 UTM in meters)

(In feet)

		Sub-		0	Q (0									Water
POD Number	Code		County	-	-	-	Sec	Tws	Rng	X	Y	DistanceDep	thWellDep		
<u>C 02479</u>		CUB	ED		4	4	10	26S	28E	587909	3546534*	807	200		
<u>C 02480</u>		CUB	ED		4	4	10	26S	28E	587909	3546534*	807	150		
<u>C 02924</u>		C	ED	1	3	2	11	26S	28E	589032	3547451*	1129			
<u>C 02160 S5</u>		CUB	ED	1	1	1	14	26S	28E	588225	3546237*	1148	300	120	180
<u>C 02481</u>		CUB	ED		1	1	14	26S	28E	588326	3546138*	1273	200		
<u>C 02160 S3</u>		CUB	ED	2	2	1	14	26S	28E	588834	3546241*	1437	300	120	180
<u>C 02160 S4</u>		CUB	ED	2	2	1	14	26S	28E	588834	3546241*	1437	300	120	180
<u>C 02160 S</u>		CUB	ED	1	1	2	14	26S	28E	589043	3546244*	1578	300	120	180
C 02160 S2		CUB	ED	1	1	2	14	26S	28E	589043	3546244*	1578	300	120	180

Average Depth to Water: 120 feet
Minimum Depth: 120 feet

Maximum Depth: 120 feet

Record Count: 9

UTMNAD83 Radius Search (in meters):

Easting (X): 587908 **Northing (Y):** 3547341 **Radius:** 1700

*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.

5/14/18 9:03 AM

WATER COLUMN/ AVERAGE DEPTH TO WATER

UTM Conversion Tool Page 1 of 1

	Public Land Survey System (PLSS)												
					•								
	Q64: 💙	Q16 : SE ✓	Q4: NE 🗸	Sec: 10 ∨ T	'ws: 26S 🗸	Rng: 28E ✓							
	State Plane Coordinate System - NAD27												
	x : 0	ft Y: 0	ft	Zone:									
	State Plane Coordinate System - NAD83												
0	x : 0	ft Y: 0	ft	Zone:		~							
	Degrees/Minutes/Seconds												
	Longitude (X):	Deg	rees: 0	Minutes:) '	Seconds: 0 "							
	Latitude (Y):	Deg	rees: 0	Minutes:	0 .	Seconds: 0 "							
				- NAD27									
	Easting (x) : 0	mtrs	Northing (Y)): 0	mtrs Zone:							
			S	UBMIT									
	All Cor	wareien Bee	ulte are die	played as <u>NAD</u>	1002 IITM	Zono 13							
			7										
	Easting (X)	587908.0	mtrs	Northing ((Y): 3547341.0	mtrs							
	~~	Please keep s	creen open to	o copy UTM value	es for Reports	s. ~~							
			-		-								

Laboratory Analytical Results Summary SRO State Com #060H

		Sample ID	SP1 @ SURFACE	SP1 @ 1'	SP1 @ 6'
Analyte	Method	Date	5/23/18	5/23/18	5/23/18
			mg/kg	mg/kg	mg/kg
Benzene	BTEX 8021B		n/a	<0.050	n/a
Toluene	BTEX 8021B		n/a	<0.050	n/a
Ethylbenzene	BTEX 8021B		n/a	<0.050	n/a
Total Xylenes	BTEX 8021B		n/a	<0.150	n/a
Total BTEX	BTEX 8021B		n/a	<0.300	n/a
Chloride	SM4500CI-B		44400	32	80
GRO	TPH 8015M		n/a	<10.0	n/a
DRO	TPH 8015M		n/a	<10.0	n/a
EXT DRO	TPH 8015M		n/a	<10.0	n/a

		Sample ID	SP2 @ 1'	SP2 @ 3'	SP2 @ 5'	SP2 @ 6'	SP2 @ 7'	SP2 @ 8'	SP2 @ 12'
Analyte	Method	Date	5/23/18	5/23/18	5/23/18	5/23/18	5/23/18	5/23/18	5/23/18
			mg/kg						
Benzene	BTEX 8021B		<0.050	n/a	n/a	n/a	n/a	n/a	n/a
Toluene	BTEX 8021B		<0.050	n/a	n/a	n/a	n/a	n/a	n/a
Ethylbenzene	BTEX 8021B		<0.050	n/a	n/a	n/a	n/a	n/a	n/a
Total Xylenes	BTEX 8021B		<0.150	n/a	n/a	n/a	n/a	n/a	n/a
Total BTEX	BTEX 8021B		<0.300	n/a	n/a	n/a	n/a	n/a	n/a
Chloride	SM4500CI-B		27600	32400	9400	6660	16	20600	16
GRO	TPH 8015M		<10.0	n/a	n/a	n/a	n/a	n/a	n/a
DRO	TPH 8015M		<10.0	n/a	n/a	n/a	n/a	n/a	n/a
EXT DRO	TPH 8015M		<10.0	n/a	n/a	n/a	n/a	n/a	n/a

		Sample ID	SP3 @ SURFACE	SP3 @ 1'	SP3 @ 6'
Analyte	Method	Date	5/23/18	5/23/18	5/23/18
Analyte	Wiethou	Date	mg/kg	mg/kg	mg/kg
Benzene	BTEX 8021B		n/a	<0.050	n/a
Toluene	BTEX 8021B		n/a	<0.050	n/a
Ethylbenzene	BTEX 8021B		n/a	<0.050	n/a
Total Xylenes	BTEX 8021B		n/a	<0.150	n/a
Total BTEX	BTEX 8021B		n/a	<0.300	n/a
Chloride	SM4500CI-B		48	32	80
GRO	TPH 8015M		n/a	<10.0	n/a
DRO	TPH 8015M		n/a	<10.0	n/a
EXT DRO	TPH 8015M		n/a	<10.0	n/a

			SP4 @		
		Sample ID	SURFACE	SP4 @ 1'	SP4 @ 6'
Analyte	Method	Date	5/23/18	5/23/18	5/23/18
			mg/kg	mg/kg	mg/kg
Benzene	BTEX 8021B		n/a	<0.050	n/a
Toluene	BTEX 8021B		n/a	<0.050	n/a
Ethylbenzene	BTEX 8021B		n/a	<0.050	n/a
Total Xylenes	BTEX 8021B		n/a	<0.150	n/a
Total BTEX	BTEX 8021B		n/a	<0.300	n/a
Chloride	SM4500CI-B		32	32	80
GRO	TPH 8015M		n/a	<10.0	n/a
DRO	TPH 8015M		n/a	<10.0	n/a
EXT DRO	TPH 8015M		n/a	<10.0	n/a

		Sample ID	NORTH
Analyte	Method	Date	5/23/18
			mg/kg
Benzene	BTEX 8021B		<0.050
Toluene	BTEX 8021B		<0.050
Ethylbenzene	BTEX 8021B		<0.050
Total Xylenes	BTEX 8021B		<0.150
Total BTEX	BTEX 8021B		<0.300
Chloride	SM4500CI-B		32
GRO	TPH 8015M		<10.0
DRO	TPH 8015M		<10.0
EXT DRO	TPH 8015M		<10.0

		Sample ID	EAST
Analyte	Method	Date	5/23/18
			mg/kg
Benzene	BTEX 8021B		<0.050
Toluene	BTEX 8021B		< 0.050
Ethylbenzene	BTEX 8021B		<0.050
Total Xylenes	BTEX 8021B		<0.150
Total BTEX	BTEX 8021B		<0.300
Chloride	SM4500CI-B		32
GRO	TPH 8015M		<10.0
DRO	TPH 8015M		<10.0
EXT DRO	TPH 8015M		<10.0

		Sample ID	SOUTH
Analyte	Method	Date	5/23/18
			mg/kg
Benzene	BTEX 8021B		<0.050
Toluene	BTEX 8021B		<0.050
Ethylbenzene	BTEX 8021B		<0.050
Total Xylenes	BTEX 8021B		<0.150
Total BTEX	BTEX 8021B		<0.300
Chloride	SM4500CI-B		32
GRO	TPH 8015M		<10.0
DRO	TPH 8015M		<10.0
EXT DRO	TPH 8015M		<10.0

		Sample ID	WEST
Analyte	Method	Date	5/23/18
			mg/kg
Benzene	BTEX 8021B		<0.050
Toluene	BTEX 8021B		<0.050
Ethylbenzene	BTEX 8021B		<0.050
Total Xylenes	BTEX 8021B		<0.150
Total BTEX	BTEX 8021B		<0.300
Chloride	SM4500CI-B		64
GRO	TPH 8015M		<10.0
DRO	TPH 8015M		<10.0
EXT DRO	TPH 8015M		<10.0



May 31, 2018

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: SRO STATE COM #060H

Enclosed are the results of analyses for samples received by the laboratory on 05/24/18 14:40.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-17-10. 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/ga/lab accred certif.html.

Cardinal Laboratories is accreditated 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)

Celeg D. Keens

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,

Celey D. Keene

Lab Director/Quality Manager



BBC International, Inc. Cliff Brunson P.O. Box 805

Hobbs NM, 88241

Fax To: (575) 397-0397

Received: 05/24/2018 Sampling Date: 05/23/2018
Reported: 05/31/2018 Sampling Type: Soil

Project Name: SRO STATE COM #060H Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Tamara Oldaker

Project Location: COG - EDDY CO

Sample ID: SP 1 @ SURFACE (H801424-01)

Chloride, SM4500Cl-B	mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	44400	16.0	05/25/2018	ND	400	100	400	7.69	

Sample ID: SP 1 @ 1' (H801424-02)

BTEX 8021B	mg,	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/25/2018	ND	1.70	85.2	2.00	2.11	
Toluene*	<0.050	0.050	05/25/2018	ND	1.70	85.1	2.00	3.26	
Ethylbenzene*	<0.050	0.050	05/25/2018	ND	1.76	88.1	2.00	0.591	
Total Xylenes*	<0.150	0.150	05/25/2018	ND	5.28	88.0	6.00	0.437	
Total BTEX	<0.300	0.300	05/25/2018	ND					

Surrogate: 4-Bromofluorobenzene (PID 123 % 69.8-142

mg/kg		Analyze	d By: AC					
Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
32.0	16.0	05/25/2018	ND	400	100	400	7.69	
mg/kg		Analyzed By: MS						
Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<10.0	10.0	05/25/2018	ND	233	117	200	1.37	
<10.0	10.0	05/25/2018	ND	225	113	200	1.48	
<10.0	10.0	05/25/2018	ND					
	Result 32.0 mg/ Result <10.0 <10.0	Result Reporting Limit 32.0 16.0 mg/kg Result Reporting Limit <10.0 10.0 <10.0 10.0	Result Reporting Limit Analyzed 32.0 16.0 05/25/2018 mg/kg Analyze Result Reporting Limit Analyzed <10.0	Result Reporting Limit Analyzed Method Blank 32.0 16.0 05/25/2018 ND mg/kg Analyzed By: MS Result Reporting Limit Analyzed Method Blank <10.0	Result Reporting Limit Analyzed Method Blank BS 32.0 16.0 05/25/2018 ND 400 mg/kg Analyzed By: MS Result Reporting Limit Analyzed Method Blank BS <10.0	Result Reporting Limit Analyzed Method Blank BS % Recovery 32.0 16.0 05/25/2018 ND 400 100 mg/kg Analyzed By: MS Result Reporting Limit Analyzed Method Blank BS % Recovery <10.0	Result Reporting Limit Analyzed Method Blank BS % Recovery True Value QC 32.0 16.0 05/25/2018 ND 400 100 400 mg/ky Analyzed By: MS Result Reporting Limit Analyzed Method Blank BS % Recovery True Value QC <10.0	Result Reporting Limit Analyzed Method Blank BS % Recovery True Value QC RPD 32.0 16.0 05/25/2018 ND 400 100 400 7.69 mg/kg Analyzed By: MS Result Reporting Limit Analyzed Method Blank BS % Recovery True Value QC RPD <10.0

Surrogate: 1-Chlorooctane 90.6 % 41-142

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Cliff Brunson P.O. Box 805 Hobbs NM, 88241

Fax To: (575) 397-0397

Received: 05/24/2018 Sampling Date: 05/23/2018

Reported: 05/31/2018 Sampling Type: Soil

Project Name: SRO STATE COM #060H Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Tamara Oldaker

Project Location: COG - EDDY CO

Sample ID: SP 1 @ 1' (H801424-02)

TPH 8015M mg/kg Analyzed By: MS

Analyte Result Reporting Limit Analyzed Method Blank BS % Recovery True Value QC RPD Qualifier

Surrogate: 1-Chlorooctadecane 90.5 % 37.6-147

Sample ID: SP 1 @ 6' (H801424-03)

Chloride, SM4500Cl-B	e, SM4500Cl-B mg/kg								
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	05/25/2018	ND	400	100	400	7.69	

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Fax To: (575) 397-0397

Received: 05/24/2018 Sampling Date: 05/23/2018

Reported: 05/31/2018 Sampling Type: Soil

Project Name: SRO STATE COM #060H Sampling Condition: Cool & Intact Sample Received By: Project Number: NONE GIVEN Tamara Oldaker

COG - EDDY CO Project Location:

Sample ID: SP 2 @ 1' (H801424-04)

BTEX 8021B	mg/kg		Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/25/2018	ND	1.70	85.2	2.00	2.11	
Toluene*	<0.050	0.050	05/25/2018	ND	1.70	85.1	2.00	3.26	
Ethylbenzene*	<0.050	0.050	05/25/2018	ND	1.76	88.1	2.00	0.591	
Total Xylenes*	<0.150	0.150	05/25/2018	ND	5.28	88.0	6.00	0.437	
Total BTEX	<0.300	0.300	05/25/2018	ND					
Surrogate: 4-Bromofluorobenzene (PID	117 9	69.8-14	2						
Chloride, SM4500Cl-B	mg/	kg	Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	27600	16.0	05/25/2018	ND	400	100	400	7.69	
TPH 8015M	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/25/2018	ND	233	117	200	1.37	
DRO >C10-C28*	<10.0	10.0	05/25/2018	ND	225	113	200	1.48	
EXT DRO >C28-C36	<10.0	10.0	05/25/2018	ND					
Surrogate: 1-Chlorooctane	81.1	% 41-142	!						
Surrogate: 1-Chlorooctadecane	79.0	% 37 6-14	7						

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Fax To: (575) 397-0397

Received: 05/24/2018 Sampling Date: 05/23/2018

Reported: 05/31/2018 Sampling Type: Soil

Project Name: SRO STATE COM #060H Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Tamara Oldaker

Project Location: COG - EDDY CO

Sample ID: SP 2 @ 3' (H801424-05)

PD Qualifier 69
59
PD Qualifier
00 QM-07
PD Qualifier
00
PD Qualifier
00
PD Qualifier
00
RPRP(

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Fax To: (575) 397-0397

Received: 05/24/2018 Sampling Date: 05/23/2018

Reported: 05/31/2018 Sampling Type: Soil

Project Name: SRO STATE COM #060H Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Tamara Oldaker

Project Location: COG - EDDY CO

Sample ID: SP 3 @ SURFACE (H801424-10)

Chloride, SM4500CI-B	mg/	кд	Analyze	а ву: АС					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	05/25/2018	ND	432	108	400	0.00	

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Cliff Brunson P.O. Box 805 Hobbs NM, 88241

Fax To: (575) 397-0397

Received: 05/24/2018 Sampling Date: 05/23/2018

Reported: 05/31/2018 Sampling Type: Soil

Project Name: SRO STATE COM #060H Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Tamara Oldaker

Project Location: COG - EDDY CO

Sample ID: SP 3 @ 1' (H801424-11)

BTEX 8021B	mg/kg		Analyze	Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/25/2018	ND	1.70	85.2	2.00	2.11	
Toluene*	<0.050	0.050	05/25/2018	ND	1.70	85.1	2.00	3.26	
Ethylbenzene*	<0.050	0.050	05/25/2018	ND	1.76	88.1	2.00	0.591	
Total Xylenes*	<0.150	0.150	05/25/2018	ND	5.28	88.0	6.00	0.437	
Total BTEX	<0.300	0.300	05/25/2018	ND					
Surrogate: 4-Bromofluorobenzene (PID	115 9	% 69.8-14	2						
Chloride, SM4500Cl-B	mg,	/kg	Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	05/25/2018	ND	432	108	400	0.00	
TPH 8015M	mg,	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/25/2018	ND	233	117	200	1.37	
DRO >C10-C28*	<10.0	10.0	05/25/2018	ND	225	113	200	1.48	
EXT DRO >C28-C36	<10.0	10.0	05/25/2018	ND					
Surrogate: 1-Chlorooctane	91.3	% 41-142	?						
Surrogate: 1-Chlorooctadecane	88.3	% 37.6-14	7						

Surrogate: 1-Chlorooctadecane 88.3 % 37.6-147

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BBC International, Inc.

Cliff Brunson P.O. Box 805 Hobbs NM, 88241

Fax To: (575) 397-0397

Received: 05/24/2018 Sampling Date: 05/23/2018

Reported: 05/31/2018 Sampling Type: Soil

Project Name: SRO STATE COM #060H Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Tamara Oldaker

Project Location: COG - EDDY CO

Sample ID: SP 3 @ 6' (H801424-12)

Chloride, SM4500Cl-B mg/kg Analyzed By: AC

Analyte Result Reporting Limit Analyzed Method Blank BS % Recovery True Value QC RPD Qualifier

Chloride 80.0 16.0 05/25/2018 ND 432 108 400 0.00

Sample ID: SP 4 @ SURFACE (H801424-13)

Chloride, SM4500Cl-B Analyzed By: AC Reporting Limit Analyzed Method Blank BS True Value QC RPD Qualifier Analyte Result % Recovery Chloride 32.0 16.0 05/25/2018 432 400 0.00 ND 108

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BBC International, Inc.

Cliff Brunson P.O. Box 805 Hobbs NM, 88241

Fax To: (575) 397-0397

Received: 05/24/2018 Sampling Date: 05/23/2018

Reported: 05/31/2018 Sampling Type: Soil Project Name: SRO STATE COM #060H Sampling Condition: Cool & Intact

Sample Received By: Project Number: NONE GIVEN Tamara Oldaker

COG - EDDY CO Project Location:

Sample ID: SP 4 @ 1' (H801424-14)

BTEX 8021B	mg/kg		Analyze	Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/25/2018	ND	1.70	85.2	2.00	2.11	
Toluene*	<0.050	0.050	05/25/2018	ND	1.70	85.1	2.00	3.26	
Ethylbenzene*	<0.050	0.050	05/25/2018	ND	1.76	88.1	2.00	0.591	
Total Xylenes*	<0.150	0.150	05/25/2018	ND	5.28	88.0	6.00	0.437	
Total BTEX	<0.300	0.300	05/25/2018	ND					
Surrogate: 4-Bromofluorobenzene (PID	110 9	% 69.8-14	2						
Chloride, SM4500CI-B	mg,	/kg	Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	05/25/2018	ND	432	108	400	0.00	
TPH 8015M	mg,	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/25/2018	ND	233	117	200	1.37	
DRO >C10-C28*	<10.0	10.0	05/25/2018	ND	225	113	200	1.48	
EXT DRO >C28-C36	<10.0	10.0	05/25/2018	ND					
Surrogate: 1-Chlorooctane	78.3	% 41-142	?						
Surrogate: 1-Chlorooctadecane	74.7	% 37.6-14	7						

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Cliff Brunson P.O. Box 805 Hobbs NM, 88241

Fax To: (575) 397-0397

Received: 05/24/2018 Sampling Date: 05/23/2018

Reported: 05/31/2018 Sampling Type: Soil

Project Name: SRO STATE COM #060H Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Tamara Oldaker

Project Location: COG - EDDY CO

Sample ID: SP 4 @ 6' (H801424-15)

Chloride, SM4500CI-B	mg/	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	05/25/2018	ND	432	108	400	0.00	

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Fax To: (575) 397-0397

Received: 05/24/2018 Sampling Date: 05/23/2018

Reported: 05/31/2018 Sampling Type: Soil Project Name: SRO STATE COM #060H Sampling Condition:

Cool & Intact Sample Received By: Project Number: NONE GIVEN Tamara Oldaker

Analyzed By: MC

COG - EDDY CO Project Location:

ma/ka

Sample ID: NORTH (H801424-16)

RTFY 8021R

BIEX 8021B	тд/кд		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/25/2018	ND	1.70	85.2	2.00	2.11	
Toluene*	< 0.050	0.050	05/25/2018	ND	1.70	85.1	2.00	3.26	
Ethylbenzene*	<0.050	0.050	05/25/2018	ND	1.76	88.1	2.00	0.591	
Total Xylenes*	<0.150	0.150	05/25/2018	ND	5.28	88.0	6.00	0.437	
Total BTEX	<0.300	0.300	05/25/2018	ND					
Surrogate: 4-Bromofluorobenzene (PID	110	% 69.8-14	22						
Chloride, SM4500Cl-B	mg,	/kg	Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	05/25/2018	ND	432	108	400	0.00	
TPH 8015M	mg,	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/25/2018	ND	233	117	200	1.37	
DRO >C10-C28*	<10.0	10.0	05/25/2018	ND	225	113	200	1.48	
EXT DRO >C28-C36	<10.0	10.0	05/25/2018	ND					
Surrogate: 1-Chlorooctane	73.8	% 41-142	?						
Surrogate: 1-Chlorooctadecane	69.7	% 37.6-14	17						

Surrogate: 1-Chlorooctadecane 69.7 % 37.6-147

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BBC International, Inc.

Cliff Brunson P.O. Box 805 Hobbs NM, 88241

Fax To: (575) 397-0397

Received: 05/24/2018 Sampling Date: 05/23/2018
Reported: 05/31/2018 Sampling Type: Soil

Project Name: SRO STATE COM #060H Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Tamara Oldaker

Project Location: COG - EDDY CO

Sample ID: EAST (H801424-17)

BTEX 8021B	mg/kg		Analyze	Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/25/2018	ND	1.70	85.2	2.00	2.11	
Toluene*	<0.050	0.050	05/25/2018	ND	1.70	85.1	2.00	3.26	
Ethylbenzene*	<0.050	0.050	05/25/2018	ND	1.76	88.1	2.00	0.591	
Total Xylenes*	<0.150	0.150	05/25/2018	ND	5.28	88.0	6.00	0.437	
Total BTEX	<0.300	0.300	05/25/2018	ND					
Surrogate: 4-Bromofluorobenzene (PID	112 9	% 69.8-14	2						
Chloride, SM4500Cl-B	mg,	/kg	Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	05/25/2018	ND	432	108	400	0.00	
TPH 8015M	mg,	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/25/2018	ND	233	117	200	1.37	
DRO >C10-C28*	<10.0	10.0	05/25/2018	ND	225	113	200	1.48	
EXT DRO >C28-C36	<10.0	10.0	05/25/2018	ND					
Surrogate: 1-Chlorooctane	81.7	% 41-142	?						
Surrogate: 1-Chlorooctadecane	78.1	% 37.6-14	7						

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Cliff Brunson P.O. Box 805 Hobbs NM, 88241

Fax To: (575) 397-0397

Received: 05/24/2018 Sampling Date: 05/23/2018

Reported: 05/31/2018 Sampling Type: Soil Project Name: SRO STATE COM #060H Sampling Condition:

Cool & Intact Sample Received By: Project Number: NONE GIVEN Tamara Oldaker

COG - EDDY CO Project Location:

Sample ID: SOUTH (H801424-18)

BTEX 8021B	mg/kg		Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/25/2018	ND	1.70	85.2	2.00	2.11	
Toluene*	<0.050	0.050	05/25/2018	ND	1.70	85.1	2.00	3.26	
Ethylbenzene*	< 0.050	0.050	05/25/2018	ND	1.76	88.1	2.00	0.591	
Total Xylenes*	<0.150	0.150	05/25/2018	ND	5.28	88.0	6.00	0.437	
Total BTEX	<0.300	0.300	05/25/2018	ND					
Surrogate: 4-Bromofluorobenzene (PID	106 9	% 69.8-14	2						
Chloride, SM4500CI-B	mg/	kg	Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	05/25/2018	ND	432	108	400	0.00	
TPH 8015M	mg/	'kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/25/2018	ND	233	117	200	1.37	
DRO >C10-C28*	<10.0	10.0	05/25/2018	ND	225	113	200	1.48	
EXT DRO >C28-C36	<10.0	10.0	05/25/2018	ND					
Surrogate: 1-Chlorooctane	85.9	% 41-142							
Surrogate: 1-Chlorooctadecane	80.5	% 37.6-14	7						

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BBC International, Inc.

Cliff Brunson P.O. Box 805 Hobbs NM, 88241

Fax To: (575) 397-0397

Received: 05/24/2018 Sampling Date: 05/23/2018

Reported: 05/31/2018 Sampling Type: Soil

Project Name: SRO STATE COM #060H Sampling Condition: Cool & Intact Sample Received By: Project Number: NONE GIVEN Tamara Oldaker

COG - EDDY CO Project Location:

Sample ID: WEST (H801424-19)

BTEX 8021B	mg/kg		Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/25/2018	ND	1.70	85.2	2.00	2.11	
Toluene*	<0.050	0.050	05/25/2018	ND	1.70	85.1	2.00	3.26	
Ethylbenzene*	<0.050	0.050	05/25/2018	ND	1.76	88.1	2.00	0.591	
Total Xylenes*	<0.150	0.150	05/25/2018	ND	5.28	88.0	6.00	0.437	
Total BTEX	<0.300	0.300	05/25/2018	ND					
Surrogate: 4-Bromofluorobenzene (PID	105 9	% 69.8-14	2						
Chloride, SM4500Cl-B	mg/	kg	Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	05/25/2018	ND	432	108	400	0.00	
TPH 8015M	mg/	'kg	Analyze	Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/25/2018	ND	233	117	200	1.37	
DRO >C10-C28*	<10.0	10.0	05/25/2018	ND	225	113	200	1.48	
EXT DRO >C28-C36	<10.0	10.0	05/25/2018	ND					
Surrogate: 1-Chlorooctane	78.5	% 41-142	!						
Surrogate: 1-Chlorooctadecane	74 7	% 37 6-14	7						

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Notes and Definitions

QR-03 The RPD value for the sample duplicate or MS/MSD was outside of QC acceptance limits due to matrix interference. QC batch

accepted based on LCS and/or LCSD recovery and/or RPD values.

QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS

ecovery.

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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Page 16 of 17

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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ARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240 (505) 393-2326 FAX (505) 393-2476

Company Name	BBC International, Inc.						8.			£	3//	LL TO						ANA	LYSI	S RE	QUE	ST		
Project Manager: Cliff Brunson									O. #:	ý							T	T	Г		Ī	T		
Address: P.O. Box 805									mpa	any:		COG		1			1	1						
city: Hobbs	City: Hobbs State: NM Zip: 88241										_	ky Has	1011	1		1		1				1		
Phone #: 575-397-6388 Fax #: 575-397-0397									dres	_	~	3000	1-001			1	1							
Project #: Project Owner:								Cit	v:					1		1				l.		1		
Project Name: SRO State Com #060H									ate:			Zip:		l						1				
Project Location: Eddy County, NM								one	#-							1			ŀ		1			
Sampler Name: Price Brunson									x #:					1						1				
FOR LAB USE ONLY		Г	Т		M.	ATRI	X			SEF	۲V.	SAMPL			l.									
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	GROUNDWATER	WASTEWATER	OIL	SLUDGE	OTHER:	ACID/BASE:	ICE / COOL	OTHER:	DATE	TIME	7)	BTEX	TPHEXT								
1	SP1 @ SURFACE											5/23/18	9:00 AM	1										
2	SP1 @ 1'											5/23/18	9:45 AM	1	1	1								
3	SP1 @ 6'								Ш			5/23/18	10:30 AM	1										
4	SP2 @ 1'											5/23/18	11:30 AM	1	1	1								
5	SP2 @ 3'											5/23/18	11:50 AM	1										
6	SP2 @ 5'											5/23/18	12:15 PM	1										
1	SP2 @ 6'							14		93		5/23/18	12:55 PM	1										
8	SP2 @ 7'											5/23/18	1:15 PM	1										
9	SP2 @ 8'											5/23/18	1:30 PM	1						0				
10	SP3 @ SURFACE										ı	5/23/18	1:50 PM	1	-									
	nd Damages. Cardinal's liability and client's exclusive remedy for a		m aris	ing whet	her bas	ed in co	ontract	or tor	t, shall	be lim	ted t	to the amount pa	id by the client for	the	Million .	-	*					_		

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aities or successors arising out or or related to the performance of services nereunder by Cardinal, regardless of whether such claim is cased upon any of the above stated reasons or otherwise.														
Relinquished By:	Date:	Received By: /	P	Phone Result:	☐ Yes	□ No	Add'l Phone #:							
	5/60/18	Y ///	F	ax Result:	☐ Yes	□ No	Add'l Fax #:							
na Drys	Times: Ohr	YAS	F	REMARKS:										
Relinquished By:	Date: 34-18	Received By:	1/1/											
Y S	Time: 2:40	Jamara & le	datak											
Delivered By: (Circle One)	2.6-	Sample Condition C	CHECKED BY:											
Complex UDC Bug Others	rected	Cool Intact -2.45 Pres Pres No No No	(Initials)											

[†] Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

Page 17 of 17

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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ARDINAL LABORATORIES
101 East Marland, Hobbs, NM 88240

	(505) 393-2326 FAX (505) 393-247	6																						
Company Name	BBC International, Inc.									В	IL	L TO						ANA	LYSIS	S RE	QUE	ST		
Project Manage	r: Cliff Brunson							P.0	. #:														, i	
Address: P.O.	Box 805							Cor	пра	ny:	C	06	-11											
city: Hobbs	State: NM	Zip	: 8	8824	1			Attn: Becky Haskell																
							Address:																	
							City:														1			
	SRO State Com #060H							Sta	te:		Z	Zip:				l								
Project Location	: Eddy County, NM						_	Pho	one	#:														
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analyses. All claims includ	nd Damages. Cardinal's liability and client's exclusive remedy for ing those for negligence and any other cause whatsoever shall be	deem	ed wait	ed unle	ss made	in writi	ng and	recei	ved by	Cardin	nal wit	thin 30 days after	er completion of the	he applic	able									
affiliates or successors aris	Cardinal be liable for incidental or consequental damages, including out of or related to the performance of services hereunder by	Cardin	al, rega	rdless	f whether	r such	claim	s base	ed upo	n any c	of the	above stated re	asons or otherwis	se.	-			10.000						
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Sampler - UPS	- Bus - Other: Parrected -	2	65	0		es F	Yes	5	-	(1)	nitia	E75												
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[†] Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476



June 05, 2018

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: SRO STATE COM #060H

Enclosed are the results of analyses for samples received by the laboratory on 06/05/18 14:13.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-17-10. 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/ga/lab accred certif.html.

Cardinal Laboratories is accreditated 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.

With Sough

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,

Mike Snyder For Celey D. Keene

Lab Director/Quality Manager



BBC International, Inc.

Cliff Brunson P.O. Box 805 Hobbs NM, 88241

Fax To: (575) 397-0397

Received: 06/05/2018 Sampling Date: 05/23/2018

Reported: 06/05/2018 Sampling Type: Soil

Project Name: SRO STATE COM #060H Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Jodi Henson

Project Location: COG - EDDY CO

Sample ID: SP 2 @ 12' (H801525-01)

Chloride, SM4500Cl-B	mg/	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	06/05/2018	ND	432	108	400	0.00	

Cardinal Laboratories *=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whistoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results related only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



Notes and Definitions

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

Cardinal Laboratories *=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whistoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results related only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



Page 4 of 4

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

RDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240 (505) 393-2326 FAX (505) 393-2476

Company Name: BBC International, Inc.										BILL TO ANALYSIS REQUEST														
Project Manage	r: Cliff Brunson							P.	O. #	:				П		Т	Т	Т	Т	Т				
Address: P.O.	Box 805							Co	omp			COG		1		1		1	1	- 1				
City: Hobbs	State: NM	Zip	: 8	382	41			At	tn:	P	300	ky Has	skell.	1				1	1	- 1				
Phone #: 575-	397-6388 Fax #: 575	-39	7-0	397				Ad	idre			3.,.		1		1	1		1	- 1				
Project #:	Project #: Project Owner:							Ci	ty:					1					1	- 1				
Project Name:	Project Name: SRO State Com #060H (5/3/18)							1	ate:			Zip:		1				1						
Project Location	: Eddy County, NM							Ph	one	#:						1								
Sampler Name:	** 12202 7420							_	x #:							1			1	- 1				
FOR LAB USE ONLY			Г	_	М	ATRI	X	_	_	ESE	RV.	SAMPL	ING	1		1			1	- 1				
Lab I.D. HSD1525	Sample I.D.	(G)RAB OR (C)OMP	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	SLUDGE	OTHER:	ACID/BASE:	ICE / COOL	OTHER:	DATE	TIME	01										
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PLEASE NOTE: Liability an	d Damages. Cardinal's liability and client's exclusive remedy for an	y clain	n arisir	ng whet	her bas	sed in co	ontract	or tor	t shall	be in	sited t	the amount on	d by the client for											
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nalyses. At claims including those for negligence and any other cause whatspeves shall be deemed waived unless made in witting envice. In no event shall Cardinal be faible for incidental or consequents or pages, including for out limitation, business interruption filiates or successors arising out of or related to the performance of services hereunger by Gazma: regardless of whether such claim Religious hed By: Date: Received By:							1					above stated re	Phone Res Fax Result REMARKS	sult: :	□ Y		No No	Add'	Phor Fax					
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[†] Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

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

State of New Mexico Energy Minerals and Natural Resources MAY 0 4 2018

Form C-141 Revised April 3, 2017

Oil Conservation Division 1220 South St. Francis Dr. DISTRICTS I ARTESTA QCAP ropriate District Office in accordance with 19.15.29 NMAC.

Attached

Santa Fe, NM 87505 Release Notification and Corrective Action **OPERATOR** Final Report COG Operating LLC (OGRID #229137) Contact: Robert McNeill 600 West Illinois Avenue, Midland TX 79701 Telephone No. 432-683-7443 Facility Name: SRO State Com #060H Battery Facility Type: Flowline API No. 30-015-41741 Surface Owner: Mineral Owner: State LOCATION OF RELEASE Unit Letter Section Township Feet from the North/South Line Feet from the East/West Line Range County 10 **26S** 28E 2,450 H North 380 East Eddy Latitude 32.0582 Longitude -104.0677 NAD83 NATURE OF RELEASE Type of Release: Volume of Release: Volume Recovered: Produced Water 6 bbl. 0 bbl. Source of Release: Date and Hour of Discovery: Date and Hour of Occurrence: May 3, 2018 8:00 am May 3, 2018 8:00 am Flowline Rupture If YES, To Whom? Was Immediate Notice Given? ☐ Yes ☒ No ☒ Not Required By Whom? Date and Hour: Was a Watercourse Reached? If YES, Volume Impacting the Watercourse. ☐ Yes ☒ No If a Watercourse was Impacted, Describe Fully.* Describe Cause of Problem and Remedial Action Taken.* The release was caused by a flowline rupture. Flowline was repaired. Describe Area Affected and Cleanup Action Taken.* The release was within a pasture. A vacuum truck was dispatched to remove all freestanding fluids. Concho will have the spill area sampled to delineate any possible impact from the release and we will present a remediation work plan to the NMOCD for approval prior to any significant remediation activities. I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD 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 NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD 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. OIL CONSERVATION DIVISION Signature: Approved by Environmental Specialist Printed Name: DeAnn Grant Approval Date: **Expiration Date:** Title: HSE Administrative Assistant

Conditions of Approx

agrant@concho.com

Phone: 432-253-4513

E-mail Address:

Date: May 4, 2018

^{*} Attach Additional Sheets If Necessary

Operator/Responsible Party,

The OCD has received the form C-141 you provided on <u>5/4/2018</u> regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number has been assigned. Please refer to this case number in all future correspondence.

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

The responsible person shall complete <u>division-approved corrective action</u> for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC. [emphasis added]

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District $\frac{2}{2}$ office in ARTESIA on or before $\frac{6/4/2018}{2}$. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

- Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.
- Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.
- Nominal detection limits for field and laboratory analyses must be provided.
- Composite sampling is not generally allowed.
- Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

- •Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.
- If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.
- Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.

Jim Griswold
OCD Environmental Bureau Chief
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
505-476-3465
jim.griswold@state.nm.us

Bratcher, Mike, EMNRD

From:

DeAnn Grant <agrant@concho.com>

Sent:

Friday, May 4, 2018 9:04 AM

To:

Bratcher, Mike, EMNRD; rmann@slo.state.nm.us

Cc:

Weaver, Crystal, EMNRD; Sheldon Hitchcock; Dakota Neel; Rebecca Haskell; DeAnn

Grant

Subject:

(Initial C-141) SRO State Com #060H Battery (30-015-41741) 5-3-2018

Attachments:

(Initial C-141) SRO State Com #060H Battery (30-015-41741) 5-3-2018.pdf

Mr. Bratcher/Mr. Mann,

Please find the attached Initial C-141 for your consideration. If you have any questions or concerns please contact me.

Thank you,

DeAnn Grant

HSE Administrative Assistant

agrant@concho.com

COG Operating LLC

600 W Illinois Avenue | Midland, TX 79701

Direct: 432-253-4513 | Main: 432.683.7443

CONCHO

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