

- 1 -



Variance Request

Site of Project:

Pogo Resources
Bagley SWD
S-34-11S-33E
1RP-5716

Report by:

Zach Robbins | Technical and Engineering Analyst | RXSoil, Inc.
201 Main St, Ste 1360, Fort Worth, TX 76102
Zach.robbsins@rxsoil.solutions | (210) 400-7645

May 22, 2020

RXSoil, Inc.

- 2 -

This report serves as a variance request for remediation project 1RP-5716 of release #NRM1927360423.

Bagley Field Rd, a Lea County road, borders this spill just to the south. Per instructed by the Lea County Road Department, excavation stopped 5' away from the edge of the road to prevent the road from collapsing. At the Road Department's request, RXSoil set up orange barricades between the road and excavation area and installed "Road Work Ahead" signs. Samples ES10 – ES15 were collected along this sidewall and tested for chlorides via Method 4500 at Cardinal Laboratories in Hobbs, shown below. Laboratory reports are attached. In order to avoid the need to build an access road parallel tearing up additional land along with the safety liability that would come with, RXSoil is requesting a variance to leave the soil in place.

There is also an electrical pole near the excavation area, shown in the map on the following page. RXSoil contacted Lea County Electric Co-op. They requested RXSoil remain 15' away from the pole until Lea County Electric personnel was on-site, in which excavation continued to 12'. A sidewall sample was tested ("TP") They are not allowing further excavation, as further excavation could lead to issues with the integrity of the pole and outages resulting in additional releases. RXSoil is requesting a variance to leave this soil in place.

Sample Name	Sample Type	Sample Date	Chloride	
			Field	M4500
ES10	Sidewall	5/18/2020	-	1550
ES11	Sidewall	5/18/2020	-	128
ES12	Sidewall	5/18/2020	-	160
ES13	Sidewall	5/18/2020	-	384
ES14	Sidewall	5/18/2020	-	48
ES15	Sidewall	5/18/2020	-	480
TP	Sidewall	5/21/2020	2404	3520
NMOCD Thresholds			600	

BOLD results indicate results above thresholds




- indicates tests were not ran

"ND" indicates a non-detectable result, below testing limits

Pogo Bagley SWD Remediation

Excavation Sample Map

Legend

-  Excavation Area
-  Sample Location
-  Telephone Pole







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

May 19, 2020

HAYES ADAMS

RX-SOIL INC.

201 MAIN STREET, SUITE 1360

FORT WORTH, TX 76102

RE: POGO

Enclosed are the results of analyses for samples received by the laboratory on 05/18/20 14:50.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-19-12. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

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

Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

RX-SOIL INC.
 HAYES ADAMS
 201 MAIN STREET, SUITE 1360
 FORT WORTH TX, 76102
 Fax To: NA

Received: 05/18/2020
 Reported: 05/19/2020
 Project Name: POGO
 Project Number: TATUM, NM
 Project Location: BAGLEY FIELD

Sampling Date: 05/16/2020
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Kelly Jacobson

Sample ID: ES -10 (H001353-01)

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1550	16.0	05/19/2020	ND	400	100	400	3.92	

Sample ID: ES -11 (H001353-02)

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	128	16.0	05/19/2020	ND	400	100	400	3.92	

Sample ID: ES -12 (H001353-03)

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	160	16.0	05/19/2020	ND	400	100	400	3.92	

Sample ID: ES -13 (H001353-04)

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	384	16.0	05/19/2020	ND	400	100	400	3.92	

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

RX-SOIL INC.
 HAYES ADAMS
 201 MAIN STREET, SUITE 1360
 FORT WORTH TX, 76102
 Fax To: NA

Received: 05/18/2020
 Reported: 05/19/2020
 Project Name: POGO
 Project Number: TATUM, NM
 Project Location: BAGLEY FIELD

Sampling Date: 05/16/2020
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Kelly Jacobson

Sample ID: ES -14 (H001353-05)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	48.0	16.0	05/19/2020	ND	400	100	400	3.92		

Sample ID: ES -15 (H001353-06)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	480	16.0	05/19/2020	ND	400	100	400	3.92	

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Celey D. Keene, Lab Director/Quality Manager



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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

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*=Accredited Analyte

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A handwritten signature in cursive script, appearing to read "Celey D. Keene".

Celey D. Keene, Lab Director/Quality Manager



CARDINAL
Laboratories

ANALYSIS REQUEST

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<p>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 the client for the analyses. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 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 data, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.</p>									
Relinquished By:		Date: 5-18-20		Received By:		Verbal Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Phone #:			
Relinquished By:		Time: 1450		All Results are emailed. Please provide Email address:					
Relinquished By:		Date:		REMARKS:					
Relinquished By:		Time:							
Delivered By: (Circle One)		Observed Temp. °C 5.3°C		Sample Condition Cool Intact <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		CHECKED BY: (Initials) h5		Turnaround Time: Standard <input type="checkbox"/> Rush <input checked="" type="checkbox"/>	
Sampler - UPS - Bus - Other:		Corrected Temp. °C				Thermometer ID #97		Bacteria (only) Cool Intact <input type="checkbox"/> Yes <input type="checkbox"/> No	
						Correction Factor +0.4°C #113		Observed Temp. °C	
								Corrected Temp. °C	

† Cardinal cannot accept verbal changes. Please email changes to celej.keene@cardinallabsnm.com

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST



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

May 22, 2020

HAYES ADAMS

RX-SOIL INC.

201 MAIN STREET, SUITE 1360

FORT WORTH, TX 76102

RE: POGO

Enclosed are the results of analyses for samples received by the laboratory on 05/21/20 16:05.

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Celey D. Keene

Lab Director/Quality Manager



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Analytical Results For:

RX-SOIL INC.
 HAYES ADAMS
 201 MAIN STREET, SUITE 1360
 FORT WORTH TX, 76102
 Fax To: NA

Received: 05/21/2020
 Reported: 05/22/2020
 Project Name: POGO
 Project Number: TATUM, NM
 Project Location: BAGLEY FIELD

Sampling Date: 05/21/2020
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Kelly Jacobson

Sample ID: TELEPHONE POLE (H001404-01)**Chloride, SM4500Cl-B****mg/kg****Analyzed By: AC**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	3520	16.0	05/22/2020	ND	416	104	400	0.00	

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Celey D. Keene, Lab Director/Quality Manager



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Celey D. Keene, Lab Director/Quality Manager



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CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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