<u>District I</u> 1625 N. French Dr., Hobbs, NM 88240 <u>District II</u> 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 Department Oil Conservation Division 1220 South St. Francis Dr. Santa Fe NIM 87505

Form C-144 Revised June 6, 2013

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office.

For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

			Sama re,	1111 07303	to the appropriate r	VIVIOCD DISTILL OTHER.
	Proposed			Frade Tank, or ermit or Closur	e Plan Application	RECEIVED By kcollins at 7:14 am, Apr 26, 201
15353		Permit of a pit on Closure of a pit, Modification to a Closure plan only	r proposed alter below-grade ta an existing perr	nk, or proposed alter nit/or registration	native method d or non-permitted pit,	below-grade tank,
	Instructions: Please s	ubmit one applicati	ion (Form C-144	) per individual pit, be	low-grade tank or altern	ative request
environment. Nor					ult in pollution of surface versions and surface versions.	water, ground water or the rules, regulations or ordinances.
Operator: Bu	rlington Resources Oil &	Gas Company, LP	OGRID #: 145	38		
	O BOX 4289, Farmington			<del></del>		
COCCESSION MENTALS AND ASSESSMENT OF THE PERSON OF THE PER	l name: PRIMO MUDG					
(050			D Permit Number	::		
1					11W County: Sa	
Center of Prop	osed Design: Latitude _	36.967785 •N	Longitude1	07.946819 <u>W</u>	NAD: □1927 🖾 1983	
	r: 🛛 Federal 🗌 State 🗀					
2.						
Pit: Subs	ection F, G or J of 19.15	.17.11 NMAC				
Temporary:	Drilling Workover					
☐ Permanent	☐ Emergency ☐ Cavit	ation P&A	Multi-Well Fluid	l Management	Low Chloride Drilling	g Fluid 🗌 yes 🔲 no
Lined	Unlined Liner type: The	nicknessmil	☐ LLDPE ☐ 1	IDPE ☐ PVC ☐ Oth	ner	
☐ String-Rein						
Liner Seams:	☐ Welded ☐ Factory	Other		Volume:bbl	Dimensions: Lx W	_x D
3,						
⊠ Below-gra	de tank: Subsection I of	of 19.15.17.11 NMA	AC			
Volume:	120	bbl Type of fluid:	Produced	l Water		
Tank Construc	tion material:N	<u> 1etal</u>		_		
☐ Secondary	containment with leak d	etection   Visible	le sidewalls, liner	, 6-inch lift and automa	tic overflow shut-off	
	lewalls and liner 🔲 Vis					
Liner type: Th	nickness	mil	PE PVC 🛛	Other <u>Unspecifie</u>	<u>d</u>	
4.						
Alternativ		to I Donald		d to the Coute De Duvin	ammantal Dumany affice f	ion consideration of engraval
Submittal of ai	n exception request is req	uired. Exceptions	must be submitte	d to the Santa Fe Envir	onmental Bureau office fo	or consideration of approval.
5.	antin D of 10 15 17 11	NIMAC /Amalias is	noumanout mit-	tampoyani pita and Lal	ou anada tankal	
( C	section D of 19.15.17.11	10 GMR 07			ow-graae tanks) feet of a permanent resid	danca school hospital
institution or c		ands of darded wire	c at top (Required	и у госаней житт 1000	jeet oj a permanent resta	енсе, ѕснооі, ноѕрниі,

Alternate. Please specify

☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet

Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks)  Screen Netting Other	
Monthly inspections (If netting or screening is not physically feasible)	
7.  Signs: Subsection C of 19.15.17.11 NMAC  12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers  Signed in compliance with 19.15.16.8 NMAC	
Variances and Exceptions:  Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.  Please check a box if one or more of the following is requested, if not leave blank:  Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.  Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.	
9. Siting Criteria (regarding permitting): 19.15.17.10 NMAC Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of accematerial are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	ptable source
General siting	
Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.  - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.  NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. (Does not apply to below grade tanks)  - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within the area overlying a subsurface mine. (Does not apply to below grade tanks)  - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No
<ul> <li>Within an unstable area. (Does not apply to below grade tanks)</li> <li>Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological Society; Topographic map</li> </ul>	☐ Yes ☐ No
Within a 100-year floodplain. (Does not apply to below grade tanks) - FEMA map	Yes No
Below Grade Tanks	
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☑ No
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;.  - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☑ No
Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)	
Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.)  - Topographic map; Visual inspection (certification) of the proposed site	Yes No
Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.	☐ Yes ☐ No
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	
Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application.  NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No

Within 100 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pit Non-low chloride drilling fluid	
Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application;  - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Permanent Pit or Multi-Well Fluid Management Pit	
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.  - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 500 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NM Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the doct attached.  Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.1 and 19.15.17.13 NMAC Previously Approved Design (attach copy of design) API Number:  or Permit Number:	uments are NMAC 5.17.9 NMAC
Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC  Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the doct attached.  Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC  Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC  A List of wells with approved application for permit to drill associated with the pit.  Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.1 and 19.15.17.13 NMAC  Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC  Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  Previously Approved Design (attach copy of design) API Number: or Permit Number:	15.17.9 NMAC

Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC  Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the	documents are
attached.  Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC  Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  Climatological Factors Assessment  Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC  Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC  Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC  Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC  Quality Control/Quality Assurance Construction and Installation Plan  Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC  Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC  Nuisance or Hazardous Odors, including H <sub>2</sub> S, Prevention Plan  Emergency Response Plan  Oil Field Waste Stream Characterization  Monitoring and Inspection Plan  Erosion Control Plan  Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC	
Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.	
Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Multi-well F  Alternative  Proposed Closure Method: Waste Excavation and Removal Waste Removal (Closed-loop systems only) On-site Closure Method (Only for temporary pits and closed-loop systems) In-place Burial On-site Trench Burial Alternative Closure Method	luid Management Pit
Maste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be closure plan. Please indicate, by a check mark in the box, that the documents are attached.  □ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC □ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC □ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings) □ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC □ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC □ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	
15. Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable sour provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. I 19.15.17.10 NMAC for guidance.	
Ground water is less than 25 feet below the bottom of the buried waste.  - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No
Ground water is more than 100 feet below the bottom of the buried waste.  - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application.  - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	

adopted pursuant to NMSA 1978, Section 3-27-3, as amended.  - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within the area overlying a subsurface mine Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No
<ul> <li>Within an unstable area.</li> <li>Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological Society; Topographic map</li> </ul>	☐ Yes ☐ No
Within a 100-year floodplain, FEMA map	Yes No
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plan by a check mark in the box, that the documents are attached.  Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC  Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.  Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.  Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC  Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC  Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC  Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cann Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	11 NMAC 15.17.11 NMAC
Operator Application Certification:  I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and beli	ef.
Name (Print): Title:	
Signature: Date:	
e-mail address:	
18.  OCD Approval: ☐ Permit Application (including closure plan) ☐ Closure Plan (only) ☐ OCD Conditions (see attachment)  OCD Representative Signature: Approval Date: 7/12/20  Title: Compliance Officer OCD Permit Number:	016
19. Closure Report (required within 60 days of closure completion): 19.15.17.13 NMAC Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not section of the form until an approved closure plan has been obtained and the closure activities have been completed.  Closure Completion Date: 11/10/2015	
20.  Closure Method:  Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-logo) ☐ If different from approved plan, please explain.	op systems only)

22.
Operator Closure Certification:
I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and
belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.
Name (Print) Crystal Walker Title: Regulatory Coordinator
Signature: Date: 4/12/2016
7
e-mail address: <u>crystal.walker@cop.com</u> Telephone: <u>(505) 326-9837</u>

# Burlington Resources Oil & Gas Company, LP San Juan Basin Below Grade Tank Closure Report

Lease Name: Primo Mudge 1B

API No.: 30-045-30119

In accordance with Rule 19.15.17.13 NMAC the following information describes the closure of the below-grade tank referenced above. All proper documentation regarding closure activities is being included with the C-144.

#### General Plan:

1. BR shall close a below-grade tank within 60 days of cessation of operations per Subsection G.4 of 19.15.17.13 NMAC. This will include a) below-grade tanks that do not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC within five years, if not retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC; b) an earlier date that the division requires because of imminent danger to fresh water, public health or the environment. For any closure, BR will file the C144 Closure Report as required.

The below-grade tank referenced above was permitted and closed within 60 days of cessation of the below-grade tanks operation.

2. BR shall remove liquids and sludge from a below-grade tank prior to implementing a closure method and shall dispose of the liquids and sludge in a division-approved facility. The facilities to be used will be Basin Disposal (Permit #NM-01-005), JFJ Landfarm % Industrial Ecosystem Inc. (Permit # NM-01-0010B) and Envirotech Land Farm (Permit #NM-01-011). The liner after being cleaned well (Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC) will be disposed of at the San Juan County Regional Landfill located on CR 3100.

All recovered liquids were disposed of at Basin Disposal (Permit #NM-01-005) and any sludge or soil required to be removed to facilitate closure was hauled to Envirotech Land Farm (Permit #NM-01-011) and JFJ Landfarm % IEI (Permit #NM-01-0010B). The liner was cleaned per Subsection D, Paragraph 1, Subparagraph (m) of 19.15.9.712 NMAC was disposed of at the San Juan County Regional Landfill located on CR 3100.

3. BR will receive prior approval to remove the below-grade tank and dispose of it in a division-approved facility or recycle, reuse, or reclaim it in a manner that the appropriate division district office approves.

The below-grade tank was disposed of in a division-approved manner.

4. If there is any on-site equipment associated with a below-grade tank, then BR shall remove the equipment, unless the equipment is required for some other purpose.

All on-site equipment associated with the below-grade tank was removed.

5. BR will test the soils beneath the below-grade tank to determine whether a release has occurred. BR shall collect, at a minimum, a five point, composite sample; collect individual grab samples from any area that is wet, discolored or showing other evidence of a release; and analyzed for the constituents listed in Table I of 19.15.17.13 NMAC. COPC shall notify the division of its results on form C-141.

A five point composite sample was taken of the below-grade tank using sampling tools and all samples tested per Subsection B of 19.15.17.1 3(B)(1)(b). (Sample results attached). Form C-141 is attached.

Components	Tests Method	Limit (mg/kg)
Benzene	EPA SW-846 8021B or 8260B	0.2
BTEX	EPA SW-846 8021B or 8260B	50
TPH	EPA SW-846 418.1	100
Chlorides	EPA 300.0	250

6. If BR or the division determines that a release has occurred, then BR shall comply with 19.15.3.116 NMAC and 19.15.1.19 NMAC, as appropriate.

A release was not determined for the above referenced well.

7. If the sampling program demonstrates that a release has not occurred or that any release does not exceed the concentrations specified in Table I of 19.15.17.13 NMAC, then BR shall backfill the excavation with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover; recontour and re-vegetate the site.

The below-grade tank area passed all requirements of Paragraph (4) of Subsection E of 19.15.17.13 NMAC and was backfilled with compacted, non-waste containing, earthen material.

- 8. Notice of Closure will be given prior to closure to the Aztec Division office between 72 hours and one week via email or verbally. The notification of closure will include the following:
  - i. Operator's name
  - ii. Location by Unit Letter, Section, Township, and Range. Well name and API number.

#### Notification is attached.

9. The surface owner shall be notified of BR's closing of the below-grade tank 72 hours, but not more than one week, prior to closure as per the approved closure plan via certified mail, return receipt requested.

The closure process notification to the landowner was sent via email. (See Attached) (Well located on Federal Land, certified mail is not required for Federal Land per BLM/OCD MOU.)

10. Re-contouring of location will match fit, shape, line, form and texture of the surrounding. Re-shaping will include drainage control, prevent ponding, and prevent erosion. Natural drainages will be unimpeded and water bars and/or silt traps will be place in areas where needed to prevent erosion on a large scale. Final re-contour shall have a uniform appearance with smooth surface, fitting the natural landscape.

The below-grade tank area was re-contoured to match fit, shape, line, form and texture of the surrounding area. Re-shaping including drainage control, to prevent ponding and erosion. Natural drainages were unimpeded and water bars and/or silt traps were placed in areas where needed to prevent erosion on a large scale. Final recontour has a uniform appearance with smooth surface, fitting the natural landscape.

11. BR shall seed the disturbed areas the first favorable growing season following closure of a below-grade tank. Seeding will be accomplished via drilling on the contour whenever practical or by other division-approved methods. BLM stipulated seed mixes will used on federally regulated lands and division-approved seed mixtures (administratively approved if required) will be utilized on all State or private lands. A uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent (50%) of pre- disturbance levels and a total percent plant cover of at least seventy percent (70%) of pre-disturbance levels, excluding noxious weeds. If alternate seed mix is required by the state, private owner or tribe, it will be implemented with administrative approval if needed. COPC will repeat seeding or planting will be continued until successful vegetative growth occurs.

Provision 13 was accomplished through complying with BLM seeding requirements as allowed by the BLM/OCD MOU.

12. A minimum of four feet of cover shall be achieved and the cover shall include one foot of suitable material, with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, to establish vegetation at the site, or the background thickness of topsoil, whichever is greater.

The below-grade tank area was backfilled and more than four feet of cover was achieved and the cover included one foot of suitable material to establish vegetation at the site.

- 13. All closure activities will include proper documentation and be available for review upon request and will be submitted to OCD within 60 days of closure of the below-grade tank. Closure report will be filed on C-144 and incorporate the following:
  - Soil Backfilling and Cover Installation (See Report)
  - Re-vegetation application rates and seeding techniques (See Report)
  - Photo documentation of the site reclamation (Included as an attachment)
  - Confirmation Sampling Results (Included as an attachment)
  - Proof of closure notice (Included as an attachment)

## Walker, Crystal

From: Walker, Crystal

Sent: Thursday, October 29, 2015 10:02 AM

**To:** Cory Smith; Katherina Diemer (kdiemer@blm.gov)

Cc: Walker, Crystal; Notor, Lori; Busse, Dollie L; Dumas, Lindsay; Hunter, Lisa

Subject: BGT Sampling Notification

#### Good Morning,

The following locations contained below-grade tanks that require re-sampling, which is scheduled below and will begin at 8:00AM each day at the first location for that day and continue through the list. Please contact Regulatory if you have any questions.

#### Friday, October 30th

Canyon Largo Unit 220	3003920743
Quitzau 8R	3004529603
Newsom 18E	3004530687
Newsom A 16	3004525787
Huerfanito Unit 79M	3004528948
Bunny Et Al 1	3004506609

#### Monday, November 2<sup>nd</sup>

Primo Mudge 1B	3004530119
San Juan 32-9 Unit 56	3004511497
Atlantic 9	3004522799
Atlantic C 10	3004520889
Lucerne A 9	3004522728
Sunray G 3	3004530158
Harvey State 11	3003905988

Thank you,

#### Crystal Walker

Regulatory Coordinator ConocoPhillips Lower 48

T: 505-326-9837 | M: 505-215-4361 | crystal.walker@cop.com

Visit the new Lower 48 website:

www.conocophillipsuslower48.com

<u>District I</u> 1625 N. French Dr., Hobbs, NM 88240 District II

1301 W. Grand Avenue, Artesia, NM 88210
District III District IV 1220 S. St. Francis Dr., Santa Fe, NM 87505

## State of New Mexico Energy Minerals and Natural Resources

Form C-141 Revised August 8, 2011 Submit 1 Copy to appropriate District Office to accordance with 19.15.29 NMAC.

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505

**Release Notification and Corrective Action** 

						OPERA'	TOR		☐ Initi	al Report	$\boxtimes$	Final Repor
Name of Co	mpany Bu	ırlington Re	sources (	Oil & Gas Comp			ystal Walker					
		<sup>h</sup> St, Farmin	gton, NM	1		CONTRACTOR	No.(505) 326-98	337				
Facility Na	ne: Primo	Mudge 1B			]	Facility Typ	e: Gas Well					
Surface Ow	ner FEDEI	RAL		Mineral O	wner I	FEDERAL			API No	. 30-045-	30119	
				LOCA	TION	OF RE	LEASE					
Unit Letter	Section	Township	Range	Feet from the		South Line	Feet from the	East/\	West Line	County		
L	24	32N	11W	1525		South	1050		West	San Juan		
			La	titude <u>36.9677</u>	85_	Longitude	e107.94681	19				
				NAT	URE	OF REL						
Type of Rele						Volume of				Recovered		
Source of Re	lease					Date and F	Hour of Occurrence	ee	Date and	Hour of Dis	covery	
Was Immedi	ate Notice C					If YES, To	Whom?					
			Yes _	No Not Re	equired							
By Whom?						Date and F		1 177 .				
Was a Water	course Reac		Yes 🛛 1	No		If YES, Vo	olume Impacting t	the Wat	ercourse.			
		em and Remee ered during t										
Describe Are N/A	a Affected ε	and Cleanup A	Action Tak	cen.*								
regulations a public health should their or the enviro	Il operators or the environment of the environment	are required to conment. The ave failed to a	o report ar acceptance adequately OCD accep	e is true and compled/or file certain rece of a C-141 report investigate and restance of a C-141 report and restance of a C-141 report and restance of a C-141 report and restance of a C-141 restance of a C-	elease no rt by the emediate	otifications as NMOCD m contaminati	nd perform correct arked as "Final R on that pose a thre	tive act eport" of eat to gr	ions for rele loes not rele round water	eases which leve the oper surface wa	may er ator of ter, hu	ndanger Tliability man health
Signature:	5	tal a		'ker		A	OIL CON			DIVISIO	<u>N</u>	
Printed Name	e: Crystal W	Valker			1	approved by	Environmental S	pecialis	ι:			
Title: Regula	atory Coordi	inator			1	Approval Dat	te:		Expiration	Date:		
Date: 4/1	2/16	.walker@cop.	5) 326-983	7		Conditions of	f Approval:			Attached		
Attach Addi		ts If Necess	ary									



Hall Environmental Analysis Laboratory 4901 Hawkins NE Albuquerque, NM 87109 TEL: 505-345-3975 FAX: 505-345-4107 Website: www.hallenvironmental.com

OrderNo.: 1511372

November 19, 2015

Emilee Skyles Animas Environmental 604 Pinon Street Farmington, NM 87401 TEL: (505) 564-2281

FAX

RE: COPC Primo Mudge 1B

Dear Emilee Skyles:

Hall Environmental Analysis Laboratory received 1 sample(s) on 11/10/2015 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to <a href="www.hallenvironmental.com">www.hallenvironmental.com</a> or the state specific web sites. In order to properly interpret your results it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

Andy Freeman

Laboratory Manager

4901 Hawkins NE

Albuquerque, NM 87109

## Analytical Report

#### Lab Order 1511372

Date Reported: 11/19/2015

## Hall Environmental Analysis Laboratory, Inc.

**CLIENT:** Animas Environmental

Project: COPC Primo Mudge 1B

1511372-001

Lab ID:

Matrix: SOIL

Client Sample ID: BGT S-1

Collection Date: 11/9/2015 3:15:00 PM

Received Date: 11/10/2015 6:50:00 AM

Analyses	Result	RL Qu	al Units	DF	Date Analyzed	Batch
EPA METHOD 418.1: TPH					Analy	st: TOM
Petroleum Hydrocarbons, TR	ND	20	mg/Kg	1	11/17/2015	22354
EPA METHOD 300.0: ANIONS					Analy	st: <b>LGT</b>
Chloride	ND	30	mg/Kg	20	11/13/2015 12:14:53	PM 22349
EPA METHOD 8015M/D: DIESEL RAN	IGE ORGANIC	S			Analy	st: <b>KJH</b>
Diesel Range Organics (DRO)	ND	9.6	mg/Kg	1	11/11/2015 3:50:50 F	M 22273
Surr: DNOP	104	70-130	%REC	1	11/11/2015 3:50:50 P	M 22273
EPA METHOD 8015D: GASOLINE RA	NGE				Analy	st: NSB
Gasoline Range Organics (GRO)	ND	4.9	mg/Kg	1	11/11/2015 10:47:08	AM 22278
Surr: BFB	94.8	75.4-113	%REC	1	11/11/2015 10:47:08	AM 22278
EPA METHOD 8021B: VOLATILES					Analy	st: NSB
Benzene	ND	0.049	mg/Kg	1	11/11/2015 10:47:08	AM 22278
Toluene	ND	0.049	mg/Kg	1	11/11/2015 10:47:08	AM 22278
Ethylbenzene	ND	0.049	mg/Kg	1	11/11/2015 10:47:08	AM 22278
Xylenes, Total	ND	0.098	mg/Kg	1	11/11/2015 10:47:08	AM 22278
Surr: 4-Bromofluorobenzene	115	80-120	%REC	1	11/11/2015 10:47:08	AM 22278

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

#### Qualifiers:

- Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits Page 1 of 6
- P Sample pH Not In Range
- RL Reporting Detection Limit

## Hall Environmental Analysis Laboratory, Inc.

WO#:

1511372

19-Nov-15

Client:

Animas Environmental

Project:

COPC Primo Mudge 1B

Sample ID MB-22349

SampType: MBLK

TestCode: EPA Method 300.0: Anions

Client ID:

PBS

11/13/2015

Batch ID: 22349

1.5

RunNo: 30257

SeqNo: 922446

Units: mg/Kg

Analyte Chloride

Prep Date:

Analysis Date: 11/13/2015 **PQL** 

SPK value SPK Ref Val %REC LowLimit

HighLimit

%RPD

%RPD

**RPDLimit** 

Qual

Sample ID LCS-22349

SampType: LCS

Result

ND

TestCode: EPA Method 300.0: Anions

Client ID: LCSS Batch ID: 22349

RunNo: 30257

11/13/2015

Analysis Date: 11/13/2015

SeqNo: 922447

Units: mg/Kg

Qual

Analyte Chloride

Prep Date:

PQL

HighLimit 110 **RPDLimit** 

SPK value SPK Ref Val %REC LowLimit 1.5 15.00 0 90.9

#### Qualifiers:

- Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- Η Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- В Analyte detected in the associated Method Blank
- E Value above quantitation range
- Analyte detected below quantitation limits
- P Sample pH Not In Range
- Reporting Detection Limit

Page 2 of 6

## Hall Environmental Analysis Laboratory, Inc.

WO#:

1511372

19-Nov-15

Client:

Animas Environmental

Project:

COPC Primo Mudge 1B

Sample ID MB-22354

SampType: MBLK

TestCode: EPA Method 418.1: TPH

Client ID:

**PBS** 

Batch ID: 22354

RunNo: 30289

Prep Date: 11/16/2015 Analysis Date: 11/17/2015

SeqNo: 923840

SPK value SPK Ref Val %REC LowLimit

Units: mg/Kg

HighLimit

%RPD

**RPDLimit** 

Qual

Analyte Petroleum Hydrocarbons, TR

Sample ID LCS-22354

ND

Result

PQL 20

TestCode: EPA Method 418.1: TPH

LCSS Client ID:

SampType: LCS Batch ID: 22354

RunNo: 30289

Prep Date: 11/16/2015

Analysis Date: 11/17/2015

SeqNo: 923841

Units: mg/Kg

116

Analyte Petroleum Hydrocarbons, TR

Result **PQL** 

20

20

SPK value SPK Ref Val

0

0

%REC LowLimit 114

83.6

%RPD

**RPDLimit** 

Qual

Sample ID LCSD-22354

Prep Date: 11/16/2015

Client ID: LCSS02 SampType: LCSD

110

Batch ID: 22354

RunNo: 30289

SeqNo: 923842

TestCode: EPA Method 418.1: TPH

HighLimit

Units: mg/Kg

**RPDLimit** Qual

Analysis Date: 11/17/2015 Result

PQL SPK value SPK Ref Val

100.0

%REC 115

83.6

LowLimit

HighLimit 116 %RPD 1.29

Petroleum Hydrocarbons, TR

120

100.0

20

#### Qualifiers:

- Value exceeds Maximum Contaminant Level.
- Sample Diluted Due to Matrix D
- Holding times for preparation or analysis exceeded Η
- ND Not Detected at the Reporting Limit R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- В Analyte detected in the associated Method Blank
- E Value above quantitation range
- Analyte detected below quantitation limits J
- P Sample pH Not In Range
- Reporting Detection Limit

Page 3 of 6

## Hall Environmental Analysis Laboratory, Inc.

WO#:

1511372

19-Nov-15

Client:

Animas Environmental

Project:

COPC Primo Mudge 1B

Sample ID MB-22273	SampType: MBLK			TestCode: EPA Method 8015M/D: Diesel Range Organics						
Client ID: PBS Batch ID: 22273		RunNo: 30150								
Prep Date: 11/10/2015	Analysis Date: 11/11/2015		SeqNo: 918894			Units: mg/Kg				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Surr: DNOP	11		10.00		110	70	130			

Sample ID LCS-22273	SampT	ype: LC	S	Tes	Code: E	PA Method	8015M/D: Di	esel Rang	e Organics	
Client ID: LCSS	Batch	n ID: 22	273	F	tunNo: 3	0150				
Prep Date: 11/10/2015	Analysis D	ate: 11	1/11/2015	S	eqNo: 9	18897	Units: mg/k	(g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	55	10	50.00	0	111	57.4	139			
Surr: DNOP	6.1		5 000		121	70	130			

#### Qualifiers:

\* Value exceeds Maximum Contaminant Level.

D Sample Diluted Due to Matrix

H Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

R RPD outside accepted recovery limits

S % Recovery outside of range due to dilution or matrix

B Analyte detected in the associated Method Blank

E Value above quantitation range

J Analyte detected below quantitation limits

P Sample pH Not In Range

RL Reporting Detection Limit

Page 4 of 6

## Hall Environmental Analysis Laboratory, Inc.

WO#:

1511372

19-Nov-15

Client:

Animas Environmental

Project:

COPC Primo Mudge 1B

Sample ID 1	/IB-22278
-------------	-----------

SampType: MBLK

TestCode: EPA Method 8015D: Gasoline Range

Client ID:

PBS

Batch ID: 22278

RunNo: 30159

Prep Date:

11/10/2015

Analysis Date: 11/11/2015

SeqNo: 919299

Units: mg/Kg

Analyte

Result **PQL** 

Client ID:

Gasoline Range Organics (GRO)

LCSS

ND 5.0 860

SPK value SPK Ref Val %REC LowLimit HighLimit 75.4

%RPD **RPDLimit**  Qual

Surr: BFB

SampType: LCS

**PQL** 

85.9 TestCode: EPA Method 8015D: Gasoline Range

113

Sample ID LCS-22278

Batch ID: 22278

RunNo: 30159

Prep Date: 11/10/2015

Result

25

940

29

970

Analyte

Analysis Date: 11/11/2015

SPK value SPK Ref Val

1000

SegNo: 919300

Units: mg/Kg

HighLimit %RPD **RPDLimit** Qual

Gasoline Range Organics (GRO) Surr: BFB

5.0 25.00 1000 %REC 100 93.5

113

122

Sample ID 1511372-001AMS Client ID: BGT S-1

SampType: MS

TestCode: EPA Method 8015D: Gasoline Range

Prep Date: 11/10/2015

Batch ID: 22278

RunNo: 30159

1.871

62.5

75.4

LowLimit

79.6

75.4

LowLimit

Units: mg/Kg

151

113

%RPD

Analyte Surr: BFB

Gasoline Range Organics (GRO)

Analysis Date: 11/11/2015 Result PQL

5.0

SPK value SPK Ref Val 24.93

997.0

SeqNo: 919308 %REC

HighLimit

**RPDLimit** 

Qual

Sample ID 1511372-001AMSD

SampType: MSD

**PQL** 

4.9

108

96.8

TestCode: EPA Method 8015D: Gasoline Range

Client ID: BGT S-1

Batch ID: 22278

RunNo: 30159

Prep Date: 11/10/2015 Analyte

Analysis Date: 11/11/2015

1.871

SeqNo: 919309

%REC LowLimit

Units: mg/Kg HighLimit

**RPDLimit** 

Qual

Gasoline Range Organics (GRO) Surr: BFB

Result 27 940

24.32 972.8

SPK value SPK Ref Val

104 96.1 62.5 75.4

151 113 5.86 0

%RPD

22.1 0

## Qualifiers:

Value exceeds Maximum Contaminant Level.

% Recovery outside of range due to dilution or matrix

- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded ND Not Detected at the Reporting Limit
- RPD outside accepted recovery limits R

- В
- Е Value above quantitation range
- J P Sample pH Not In Range
- Reporting Detection Limit
- Analyte detected in the associated Method Blank
- - Analyte detected below quantitation limits Page 5 of 6

## Hall Environmental Analysis Laboratory, Inc.

WO#:

1511372

19-Nov-15

Client:

Animas Environmental

Project:

COPC Primo Mudge 1B

Sample ID MB-22278	SampT	ype: ME	BLK	Tes	tCode: El	PA Method	8021B: Volat	iles		
Client ID: PBS	Batch	ID: 22	278	R	tunNo: 3	0159				
Prep Date: 11/10/2015	Analysis D	ate: 11	1/11/2015	S	eqNo: 9	19328	Units: mg/K	g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.050								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	1.1		1.000		109	80	120			

Sample ID LCS-22278	SampT	ype: LC	s	Tes	tCode: El	PA Method	8021B: Vola	tiles		
Client ID: LCSS	Batch	n ID: 22	278	F	RunNo: 3	0159				
Prep Date: 11/10/2015	Analysis D	ate: 11	//11/2015	S	SeqNo: 9	19330	Units: mg/k	(g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.96	0.050	1.000	0	96.4	80	120			
Toluene	0.94	0.050	1.000	0	94.2	80	120			
Ethylbenzene	0.99	0.050	1.000	0	98.8	80	120			
Xylenes, Total	3.0	0.10	3.000	0	101	80	120			
Surr: 4-Bromofluorobenzene	1.2		1.000		116	80	120			

#### Qualifiers:

- \* Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit

Page 6 of 6



Hall Environmental Analysis Laboratory 1901 Hawkins NE Albuquerque, NM 87109

TEL: 505-345-3975 FAX: 505-345-4107 Website: www.hallenvironmental.com

## Sample Log-In Check List

Work Order Number: 1511372 ReptNo: 1 Client Name: Animas Environmental Received by/date: 11/10/2015 6:50:00 AM Logged By: Ashley Gallegos 11/10/2015 8:50:10 AM Ashley Gallegos Completed By: 11/10/15 Reviewed By: Chain of Custody No 🗌 Not Present Yes 1. Custody seals intact on sample bottles? No 🗌 Yes V Not Present 2. Is Chain of Custody complete? Courier 3. How was the sample delivered? Log In NA L No 🗌 Yes V 4. Was an attempt made to cool the samples? NA 5. Were all samples received at a temperature of >0° C to 6.0°C No 🗌 No Yes 🗸 Sample(s) In proper container(s)? No 🗌 7. Sufficient sample volume for indicated test(s)? V No 🗌 8. Are samples (except VOA and ONG) properly preserved? NA 🗌 No V Yes 9. Was preservative added to bottles? No VOA Vials No 🗌 Yes 10. VOA vials have zero headspace? Yes 🗌 No V 11. Were any sample containers received broken? # of preserved bottles checked for pH: No 🗌 Yes V 12. Does paperwork match bottle labels? (<2 or >12 unless noted) (Note discrepancies on chain of custody) Adjusted? No Yes V 13. Are matrices correctly identified on Chain of Custody? No L 14. Is it clear what analyses were requested? No 🗌 Checked by: Yes V 15. Were all holding times able to be met? (If no, notify customer for authorization ) Special Handling (if applicable) NA V Yes No 🗌 16. Was client notified of all discrepancies with this order? Date Person Notified: eMall Phone Fax In Person Via: By Whom: Regarding: Client Instructions: 17. Additional remarks: 18. Cooler Information Seal Date Condition Seal Intact | Seal No Cooler No Temp °C Good

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179-15	1515	SOIL	BGT S-1	2 - 4 oz.	cool	100-	×	×	×						
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Date:	Time:		Relinquished by:	Received by:	The same	Date Time	OSERIU: GA Area: 1 Ordered by:	USEKIU: GAKKECU Area: 1 Ordered by:	ZH. CO						
	If necessary,	7 8	mples submitted to Hall Environmental may be subcontracted to other accedited laboratories. This serves as notice of this possibility.	contracted to other acc	credited laboratorie	es. This serves as notice of	this possil		sub-contra	rted data wi	Any sub-contracted data will be clearly notated on the analytical report	notated on	the analy	ical repo	

