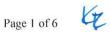
For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office. For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

<u>Pit, Below-Grade Tank, or</u> Proposed Alternative Method Permit or Closure Plan Application	
Type of action: Below grade tank registration	s at 9:56 am, Dec 30, 2015
Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rule	er, ground water or the
1. Operator: Burlington Resources Oil & Gas Company, LP OGRID #: 14538 Address: PO BOX 4289, Farmington, NM 87499 Facility or well name: SAN JUAN 32-9 UNIT 201S API Number: 30-045-31930 OCD Permit Number: U/L or Qtr/Qtr 1 (NESE) Section 2 Township 31N Range 9W County: Sa Center of Proposed Design: Latitude 36.92451 •N Longitude -107.74325 •W NAD: 1927 [1927] Surface Owner: Federal State Private Private Tribal Trust or Indian Allotment	(3-3)
2. Pit: Subsection F, G or J of 19.15.17.11 NMAC Temporary: Drilling Workover Permanent Emergency Cavitation P&A Multi-Well Fluid Management Low Chloride Drilling Fl Lined Unlined Liner type: Thicknessmil LLDPE HDPE PVC Other String-Reinforced String-Reinforced Unlinent Dimensions: L	400-50 · 30-51
3. Below-grade tank: Subsection I of 19.15.17.11 NMAC Volume: 120 bbl Type of fluid: Produced Water Tank Construction material: Metal Secondary containment with leak detection Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls and liner Visible sidewalls only Other Liner type: Thickness mil HDPE PVC Other UNSPECIFIED	
 <u>Alternative Method</u>: Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for c 	onsideration of approval.
 5. Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks) Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence institution or church) Four foot height, four strands of barbed wire evenly spaced between one and four feet Alternate. Please specify	e, school, hospital,



Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks)

Screen Netting Other_

6.

7.

Monthly inspections (If netting or screening is not physically feasible)

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.

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 acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.

General siting	
<u>Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.</u> - ☐ 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 ⊠ NA
 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
 Within an unstable area. (Does not apply to below grade tanks) Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map 	🗌 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
10. Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 N Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the doc 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 Design Plan - 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. and 19.15.17.13 NMAC Previously Approved Design (attach copy of design) API Number: or Permit Number:	nMAC 15.17.9 NMAC
11.	
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 doc attached.	.15.17.9 NMAC
Previously Approved Design (attach copy of design) API Number: or Permit Number:	

12.	
<u>Permanent Pits Permit Application Checklist</u> : 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 Ourlity Control/Outlity 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 H₂S, 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	
13. Proposed Closure: 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 □ Alternative Proposed Closure Method: ☑ Waste Excavation and Removal	luid Management Pit
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	
 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. <u>Siting Criteria (regarding on-site closure methods only)</u> : 19.15.17.10 NMAC <i>Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable sour</i> provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. F 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 ☐ NA
 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
Within an unstable area.	
 Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map 	🗌 Yes 🗌 No
Within a 100-year floodplain. - FEMA map	Yes No
 16. On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plane 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 canned 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
17. 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):	1
Signature: Date:	
e-mail address: Telephone:	
e-mail address: Telephone: <u>OCD Approva</u> l:	
e-mail address: Telephone:	
e-mail address: Telephone: <u>OCD Approva</u> l: Dermit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)	
e-mail address: Telephone:	016
e-mail address: Telephone:	016
e-mail address: Telephone:	016 the closure report. complete this

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 Coordinate	or		
Signature:	Gotal a	Jalk	u	Date:	12/29/15	
e-mail address:	crystal.walker@cop.com	Telephone:	(505) 326-9837		-	

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

Lease Name: San Juan 32-9 Unit 201S API No.: 30-045-31930

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:

 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 or is not included in Paragraph (5) 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.

 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
ТРН	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 missing.

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 not found.

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 (Missing)

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Submit 1 Copy to appropriate District Office to accordance with 19.15.29 NMAC.

San	la Fe, NM 87505	the second second second second								
Release Notifica	tion and Corrective Ac	ction								
	OPERATOR	🗌 Initia	l Report	Final Report						
Name of Company Burlington Resources Oil & Gas Company	Contact Crystal Walker									
Address 3401 East 30 th St, Farmington, NM	Telephone No.(505) 326-9837									
Facility Name: San Juan 32-9 Unit 201S	Facility Type: Gas Well									
Surface Owner State Mineral Ow	ner State	API No.	30-045-319	30						
LOCAT	TION OF RELEASE									
Unit LetterSectionTownshipRangeFeet from theNorth/South LineFeet from theEast/West LineCountyI231N9W1820South815EastSan Juan										
Latitude <u>36.9</u>	2451 Longitude <u>-107.74325</u>									
NATU	RE OF RELEASE									
Type of Release	Volume of Release	Volume R								
Source of Release	Date and Hour of Occurrence	Date and H	Hour of Disco	overy						
Was Immediate Notice Given?	If YES, To Whom?									
By Whom?	Date and Hour									
Was a Watercourse Reached?	If YES, Volume Impacting th	e Watercourse.								
N/A Describe Cause of Problem and Remedial Action Taken.* No release was encountered during the BGT Closure. Describe Area Affected and Cleanup Action Taken.* N/A										
I hereby certify that the information given above is true and complet regulations all operators are required to report and/or file certain rele public health or the environment. The acceptance of a C-141 report should their operations have failed to adequately investigate and rem or the environment. In addition, NMOCD acceptance of a C-141 rep federal, state, or local laws and/or regulations.	ase notifications and perform correct by the NMOCD marked as "Final Re rediate contamination that pose a three	ive actions for relea port" does not relie at to ground water,	ases which m eve the opera surface wate	nay endanger tor of liability er, human health						
Signature: John Walker		ERVATION I	DIVISIO	N						
Printed Name: Crystal Walker	Approved by Environmental Sp	ecialist:								
Title: Regulatory Coordinator	Approval Date:	Expiration D	Date:							
E-mail Address: crystal.walker@cop.com	Conditions of Approval:		Attached							
Date: 12/30/15 Phone: (505) 326-9837										

* Attach Additional Sheets If Necessary



www.animasenvironmental.com

624 E. Comanche

505-564-2281

Durango, Colorado

970-403-3084

Farmington, NM 87401

May 13, 2013

Crystal Tafoya ConocoPhillips San Juan Business Unit Office 214-05 5525 Hwy 64 Farmington, New Mexico 87401

RE: Below Grade Tank Closure Report San Juan 32-9 #201S San Juan County, New Mexico

Dear Ms. Tafoya:

Animas Environmental Services, LLC (AES) is pleased to provide the final report associated with the below grade tank (BGT) closure at ConocoPhillips (CoP) San Juan 32-9 #201S, located in San Juan County, New Mexico. Tank removal had been completed by CoP contractors prior to AES' arrival at the location.

1.0 Site Information

1.1 Location

Site Name – San Juan 32-9 #201S Legal Description – NE¼ SE¼, Section 2, T31N, R9W, San Juan County, New Mexico Well Latitude/Longitude – N36.92451 and W107.74361, respectively BGT Latitude/Longitude – N36.92451 and W107.74325, respectively Land Jurisdiction – State of New Mexico Figure 1. Topographic Site Location Map Figure 2. Aerial Site Map, April 2013

1.2 NMOCD Ranking

Prior to site work, the New Mexico Oil Conservation Division (NMOCD) database was reviewed, and a cathodic report dated May 31, 1991, for the San Juan 32-9 #201S reported hitting moist soil at 60 feet below ground surface (bgs) and 140 feet bgs, but no groundwater was reached. The New Mexico Office of the State Engineer (NMOSE) database was reviewed for nearby water wells, and no registered water wells were reported to be located within 1,000 feet of the location. Additionally, Google Earth and the New Mexico Tech Petroleum Recovery Research Center online mapping tool

Crystal Tafoya San Juan 32-9 #201S BGT Closure Report May 13, 2013 Page 2 of 5

(<u>http://ford.nmt.edu/react/project.html</u>) were accessed to aid in the identification of downgradient surface water.

Once on site, AES personnel further assessed the ranking using topographical interpretation, Global Positioning System (GPS) elevation readings, and visual reconnaissance. AES personnel concluded that depth to groundwater at the site was greater than 100 feet bgs. An unnamed wash which discharges to Rawhide Canyon is located approximately 500 feet southeast of the location. Based on this information, the location was assessed a ranking score of 10.

1.3 BGT Closure Assessment

AES was initially contacted by Bruce Ashcroft, CoP representative, on April 17, 2013, and on April 18, 2013, Tami Ross and Lavina Lamone of AES mobilized to the location. AES personnel collected six soil samples from below the BGT liner. Four samples were collected from the perimeter of the BGT footprint, one sample was collected from the center of the BGT footprint, and one sample was composited from the four perimeter samples and one center sample.

2.0 Soil Sampling

On April 18, 2013, AES personnel conducted field screening and collected five soil samples (S-1 through S-5) and one 5-point composite (SC-1) from below the BGT. Soil samples were collected from approximately 0.5 feet below the former BGT for field screening of volatile organic compounds (VOCs) and total petroleum hydrocarbon (TPH). Soil sample SC-1 was field screened for chloride and was submitted for confirmation laboratory analysis. Soil sample locations are included on Figure 2.

2.1 Field Screening

2.1.1 Volatile Organic Compounds

A portion of each sample was utilized for field screening of VOC vapors with a photoionization detector (PID) organic vapor meter (OVM). Before beginning field screening, the PID-OVM was first calibrated with 100 parts per million (ppm) isobutylene gas.

2.1.2 Total Petroleum Hydrocarbons

Soil samples were also analyzed in the field for TPH per USEPA Method 418.1 using a Buck Scientific Model HC-404 Total Hydrocarbon Analyzer Infrared Spectrometer (Buck). A 3-point calibration was completed prior to conducting soil analyses. Field analytical protocol followed AES's *Standard Operating Procedure: Field Analysis Total Petroleum Hydrocarbons per EPA Method 418.1*.

Crystal Tafoya San Juan 32-9 #2015 BGT Closure Report May 13, 2013 Page 3 of 5

2.1.3 Chlorides

Soil sample SC-1 was field screened for chlorides using Chloride Drop Count Titration with silver nitrate. Sampling and analysis methods followed procedures provided by Hach Company.

2.2 Laboratory Analyses

The composite soil sample SC-1 collected for laboratory analysis was placed into a new, clean, laboratory-supplied container, which was then labeled, placed on ice, and logged onto a sample chain of custody record. The sample was maintained on ice until delivery to the analytical laboratory, Hall Environmental Analysis Laboratory (Hall), in Albuquerque, New Mexico. Soil sample SC-1 was laboratory analyzed for:

- Benzene, toluene, ethylbenzene, and xylene (BTEX) per U.S. Environmental Protection Agency (USEPA) Method 8260B; and
- Chloride per USEPA Method 300.0.

2.3 Field and Laboratory Analytical Results

Field screening readings for VOCs via OVM ranged from 1.3 ppm in S-1 up to 3.8 ppm in S-5. Field TPH concentrations ranged from less than 20.0 mg/kg in S-1 through S-3 and S-5 up to 88.4 mg/kg in S-4. The field chloride concentration in SC-1 was less than 20 mg/kg. Field screening results are summarized in Table 1 and presented on Figure 2. The AES Field Screening Report is attached.

Sample ID	Date Sampled	Depth below BGT (ft)	VOCs OVM Reading (ppm)	Field TPH (mg/kg)	Field Chlorides (mg/kg)
NMOCD Action L	evel (NMAC 19.	15.17.13E)		100	250
S-1	04/18/13	0.5	1.3	<20.0	NA
S-2	04/18/13	0.5	1.9	<20.0	NA
S-3	04/18/13	0.5	2.7	<20.0	NA
S-4	04/18/13	0.5	3.2	88.4	NA
S-5	04/18/13	0.5	3.8	<20.0	NA
SC-1	04/18/13	0.5	NA	NA	<20

Table 1. Soil Field Screening VOCs, TPH, and Chloride Results

NA - not analyzed

Crystal Tafoya San Juan 32-9 #201S BGT Closure Report May 13, 2013 Page 4 of 5

Laboratory analytical results reported benzene and total BTEX concentrations in SC-1 as less than 0.050 mg/kg and 0.25 mg/kg, respectively. The laboratory chloride concentration was reported below the laboratory detection limit of 30 mg/kg. Laboratory analytical results are summarized in Table 2 and included on Figure 2. Laboratory analytical reports are attached.

Sample ID	Date Sampled	Depth (ft)	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH- GRO (mg/kg)	TPH- DRO (mg/kg)	Chlorides (mg/kg)
NMOCD Action Level (NMAC 19.15.17.13E)			0.2	50	1	00	250
SC-1	04/18/13	0.5	<0.050	<0.25	NA	NA	<30

Table 2. Soil Laboratory Analytical Results San Juan 32-9 #201S BGT Closure, April 2013

NA - not analyzed

3.0 Conclusions and Recommendations

NMOCD action levels for BGT closures are specified in New Mexico Administrative Code (NMAC) 19.15.17.13E. Field TPH concentrations were below the NMOCD action level of 100 mg/kg, with the highest concentration reported in S-4 with 88.4 mg/kg. Benzene and total BTEX concentrations in SC-1 were below the NMOCD action levels of 0.2 mg/kg and 50 mg/kg, respectively. Chloride concentrations in SC-1 were below the NMOCD action level of 250 mg/kg. Based on field screening and laboratory analytical results for benzene, total BTEX, TPH, and chlorides, no further work is recommended at the San Juan 32-9 #201S.

If you have any questions about this report or site conditions, please do not hesitate to contact Deborah Watson at (505) 564-2281.

Sincerely,

Atephanicolyn

Stephanie Lynn Environmental Engineer

Crystal Tafoya San Juan 32-9 #201S BGT Closure Report May 13, 2013 Page 5 of 5

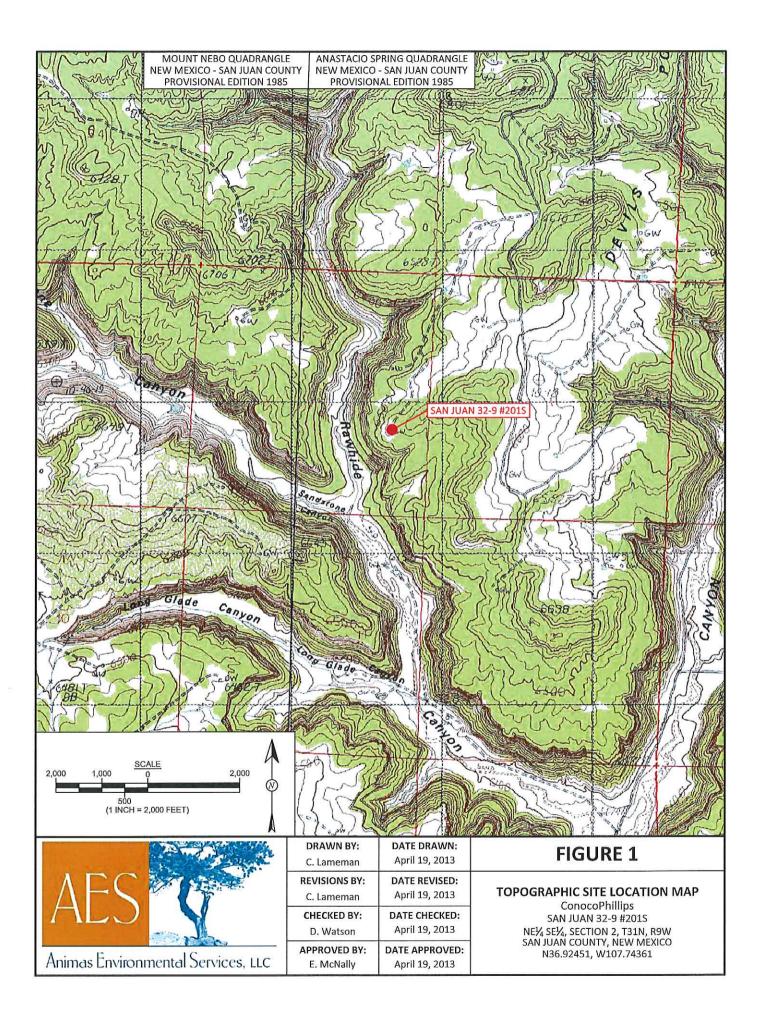
Elizabeth V Mendly

Elizabeth McNally, P.E.

Attachments:

Figure 1. Topographic Site Location Map Figure 2. Aerial Site Map, April 2013 AES Field Screening Report 041813 Hall Analytical Report 1304798

R:\Animas 2000\Dropbox\2013 Projects\ConocoPhillips\SJ 32-9 #201S\SJ 32-9 #201S BGT Closure Report 051313.docx



LEGEND

SAMPLE LOCATIONS

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Sumple ID	Date	(ppm)	(mg/kg)	(mg/kg)			1	Total	TPH -	TPH -	
NMOCD AC	TION LEVEL		100	250	Sample ID	Date	Benzene (mg/kg)	BTEX (mg/kg)	GRO (mg/kg)	DRO	Chlorides (mg/kg)
S-1	4/18/13	1.3	<20.0	NA		CTION LEVEL	0.2	50		00	250
S-2	4/18/13	1.9	<20.0	NA	SC-1	4/18/13	<0.050	<0.25	NA	NA	<30
S-3	4/18/13	2.7	<20.0	NA		AS ANALYZED			and the second	And an	
S-4	4/18/13	3.2	88.4	NA	COMPANY OF	The second second	Star 1		- Aller		10-22
S-5	4/18/13	3.8	<20.0	NA	A STRUCT		States 1	and the second	- HERE		An Internet
SC-1	4/18/13	NA	NA	<20	S SHOW		100		1	1	100
SC-1 IS A 5-PC THROUGH S-5				-1	Lower PL		and the second	P.K. A		1000	
	32-9 #201S WELLHEAD				5- N36.92451 V107.74325 S-4-	5	-5-3 -5-1 -5-2			テン教	
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20	0 1 = 40 FEET)			DR C. I REV C. I C. I CHE D.	AWN BY: Lameman ISIONS BY: Lameman ECKED BY: Watson	DATE DRAV April 19, 20 DATE REVIS April 19, 20 DATE CHECK	WN: 013 SED: 013 KED: 013	BELO NE ¹ /2	FIGU AERIAL W GRADE APRI Conoc SAN JUAN SE¼, SECT	JRE 2 SITE MAF E TANK CL IL 2013 coPhillips	L OSURE S J, R9W

AES Field Screening Report



Animas Environmental Services, LLC

www.animasenvironmental.com

624 E. Comanche Farmington, NM 87401 505-564-2281

Project Location: San Juan 32-9 #201S

Date: 4/18/2013

Matrix: Soil

Client: ConocoPhillips

Durango, Colorado 970-403-3084

	S						
TPH	Analysts Initials	TR	TR	TR	TR	TR	
	DF	1	1	1	1	1	н.
	TPH PQL (mg/kg)	20.0	20.0	20.0	20.0	20.0	Not Analyzed for TPH.
	Field TPH* (mg/kg)	<20.0	<20.0	<20.0	88.4	<20.0	Not,
Field TPH	Analysis Time	13:17	13:22	13:27	13:33	13:37	
Field	Chloride (mg/kg)	NA	NA	NA	NA	NA	NA
	OVM (ppm)	1.3	1.9	2.7	3.2	3.8	NA
	Sample Location	Center	East	North	South	West	Composite
Time of	Sample Collection	12:30	12:35	12:38	12:43	12:44	12:45
	Collection Date	4/18/2013	4/18/2013	4/18/2013	4/18/2013	4/18/2013	4/18/2013
	Sample ID	S-1	S-2	S-3	S-4	S-5	SC-1

Practical Quantitation Limit PQL Not Detected at the Reporting Limit QN

Not Analyzed

Dilution Factor NA DF

*Field TPH concentrations recorded may be below PQL.

Jami C. Ross Analyst:

Field Chloride - Quantab Chloride Titrators or Drop Count Titration with

Total Petroleum Hydrocarbons - USEPA 418.1

Silver Nitrate

Page 1 Report Finalized: 04/18/13



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

April 23, 2013

Debbie Watson Animas Environmental Services 624 East Comanche Farmington, NM 87401 TEL: (505) 486-4071 FAX

RE: COP SJ 32-9 Well 201S

OrderNo.: 1304798

Dear Debbie Watson:

Hall Environmental Analysis Laboratory received 1 sample(s) on 4/19/2013 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 <u>www.hallenvironmental.com</u> or the state specific web sites. 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. 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.

Sincerely,

andy

Andy Freeman Laboratory Manager 4901 Hawkins NE Albuquerque, NM 87109

Analytical Report Lab Order 1304798 Date Reported: 4/23/2013

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Animas Environmental Services Client Sample ID: SC-1 **Project:** COP SJ 32-9 Well 201S Collection Date: 4/18/2013 1:15:00 PM Lab ID: 1304798-001 Matrix: SOIL Received Date: 4/19/2013 10:15:00 AM Analyses Dogult RI Qual Unita DD Date Analand

Analyses	Result	RL Qu	al Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS					Analyst: JRR
Chloride	ND	30	mg/Kg	20	4/19/2013 12:09:50 PM
EPA METHOD 8260B: VOLATILES	SHORT LIST				Analyst: RAA
Benzene	ND	0.050	mg/Kg	1	4/19/2013 1:17:25 PM
Toluene	ND	0.050	mg/Kg	1	4/19/2013 1:17:25 PM
Ethylbenzene	ND	0.050	mg/Kg	1	4/19/2013 1:17:25 PM
Xylenes, Total	ND	0.10	mg/Kg	1	4/19/2013 1:17:25 PM
Surr: 1,2-Dichloroethane-d4	83.1	70-130	%REC	1	4/19/2013 1:17:25 PM
Surr: 4-Bromofluorobenzene	85.4	70-130	%REC	1	4/19/2013 1:17:25 PM
Surr: Dibromofluoromethane	89.1	70-130	%REC	1	4/19/2013 1:17:25 PM
Surr: Toluene-d8	94.1	70-130	%REC	1	4/19/2013 1:17:25 PM

Qualifiers:

*

Value exceeds Maximum Contaminant Level.

Е Value above quantitation range

- J Analyte detected below quantitation limits
- Р Sample pH greater than 2
- RL Reporting Detection Limit

- В Analyte detected in the associated Method Blank
- Holding times for preparation or analysis exceeded Η

ND Not Detected at the Reporting Limit

- RPD outside accepted recovery limits R
- Spike Recovery outside accepted recovery limits S

QC SUMMARY REPORT Hall Environmental Analysis Laboratory, Inc.

WO#: 1304798

23-Apr-13

Client: Project:	Animas Environmental Services COP SJ 32-9 Well 201S													
Sample ID	MB-7071	SampT	ype: M	BLK	TestCode: EPA Method 300.0: Anions									
Client ID:	PBS	Batch	n ID: 70	71	F	RunNo: 1								
Prep Date:	4/19/2013	Analysis D	ate: 4	/19/2013	5	SeqNo: 2	85211	Units: mg/M	٢g					
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit %RPD RPDLimit Qu						
Chloride		ND	1.5											
Sample ID	LCS-7071	SampT	ype: LC	s	TestCode: EPA Method 300.0: Anions									
Client ID:	LCSS	Batch	1D: 70	71	RunNo: 10014									
Prep Date:	4/19/2013	Analysis D	ate: 4	/19/2013	S	SeqNo: 2	85212	Units: mg/Kg						
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual			
Chloride		14	1.5	15.00	0	94.6	90	110						
Sample ID	1304713-001AMS	SampT	ype: MS	S	Tes	tCode: E	PA Method	300.0: Anion	s					
Client ID:	BatchQC	Batch	n ID: 70	71	RunNo: 10014									
Prep Date:	4/19/2013	Analysis D	ate: 4	19/2013	S	SeqNo: 2	g							
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual			
Chloride		220	7.5	15.00	167.0	333	64.4	117			S			
Sample ID	1304713-001AMS) SampT	ype: MS	SD.	Tes	tCode: El	PA Method	300.0: Anion	s					
Client ID:	BatchQC	Batch	n ID: 70	71	F	RunNo: 1	0014							
Prep Date:	4/19/2013	Analysis D	ate: 4/	19/2013	S	SeqNo: 2	85225	Units: mg/Kg						
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual			
Chloride		200	7.5	15.00	167.0	220	64.4	117	8.11	20	S			

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH greater than 2
- RL Reporting Detection Limit

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits

Page 2 of 3

QC SUMMARY REPORT Hall Environmental Analysis Laboratory, Inc.

WO#: 1304798

23-Apr-13

	Environme 32-9 Well		vices										
Sample ID mb-6961	SampT	Гуре: М	3LK	Tes	tCode: El	PA Method	8260B: Vola	tiles Short	List				
Client ID: PBS	Batcl	h ID: R1	0011	RunNo: 10011									
Prep Date: 4/12/2013	Analysis E	Date: 4/	19/2013	5	SeqNo: 286008 Units: mg/Kg								
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: 1,2-Dichloroethane-d4	0.43		0.5000	85.7 70			130						
Surr: 4-Bromofluorobenzene	0.43		0.5000	85.7 70			130						
Surr: Dibromofluoromethane	0.44		0.5000	88.6 70			130						
Surr: Toluene-d8	0.50 0.5000			101 70			130						
Sample ID Ics-6961	SampT	ype: LC	S	TestCode: EPA Method 8260B: Volatiles Short List									
Client ID: LCSS	Batch	n ID: R1	0011	F	unNo: 1	0011							
Prep Date: 4/12/2013	Analysis D)ate: 4/	19/2013	S	eqNo: 2	g							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual			
Benzene	0.86	0.050	1.000	0	86.2	70	130						
Foluene	0.93	0.050	1.000	0	93.1	80	120						
Surr: 1,2-Dichloroethane-d4	0.44		0.5000		87.3	70	130						
Surr: 4-Bromofluorobenzene	0.42		0.5000		84.1 7		130						
Surr: Dibromofluoromethane	0.47		0.5000		93.3	70	130						
						7.81 UBC2							

Qualifiers:

-

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH greater than 2
- RL Reporting Detection Limit

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits

Page 3 of 3

HALL ENVIRONMENTAL ANALYSIS LABORATORY	A TEL: 505-345-39	al Analysis Laborat 4901 Hawkins Ibuquerque, NM 871 75 FAX: 505-345-41 hallenvironmental.c		Sample Log-In Check List							
Client Name: Animas Environmental	Work Order Numbe	ər: 1304798		RcptNo: 1							
Received by/date: ATOL/11911	3										
Logged By: Anne Thorne	4/19/2013 10:15:00 A	٨M	anne Shim	-							
Completed By: Anne Thorne	4/19/2013		anne Hann	-							
Reviewed By: Ar oul/1911	3										
Chain of Custody											
1. Custody seals intact on sample bottles?		Yes 🗌	No 🗌	Not Present							
2. Is Chain of Custody complete?		Yes 🗹	No 🗌	Not Present							
3. How was the sample delivered?		Courier									
<u>Log In</u>											
4. Was an attempt made to cool the samples?		Yes 🔽	No 🗌								
5. Were all samples received at a temperature of	of >0° C to 6.0°C	Yes 🗹	No 🗌								
6. Sample(s) In proper container(s)?		Yes 🗹	No 🗌								
7. Sufficient sample volume for indicated test(s)	?	Yes 🗹	No 🗌								
8. Are samples (except VOA and ONG) properly	preserved?	Yes 🗹	No 🗌								
9. Was preservative added to bottles?		Yes	No 🗹	NA 🗌							
10.VOA vials have zero headspace?		Yes	No 🗆	No VOA Vials 🗹							
11. Were any sample containers received broker	?	Yes	No 🗹 🏾	# of preserved							
12.Does paperwork match bottle labels?		Yes 🔽	No 🗆	bottles checked for pH:							
(Note discrepancies on chain of custody)					>12 unless noted)						
13. Are matrices correctly identified on Chain of C	ustody?	Yes 🗹	No 🗌	Adjusted?							
14. Is it clear what analyses were requested?		Yes 🗹	No 🗌								
 Were all holding times able to be met? (If no, notify customer for authorization.) 		Yes 🗹	No L.I	Checked by:							
Special Handling (if applicable)											
16. Was client notified of all discrepancies with th	is order?	Yes 🗌	No 🗌	NA 🗹							
Person Notified:	Date	a annan a	· · ·								
By Whom:	Via:	🗌 eMail 📋 Ph	ione 🗌 Fax	In Person							
Regarding: Client Instructions:		26 Your 242 - 200		·····							
17. Additional remarks:		2. •.J. J . • • • • • • • • • • • • • • •		(
18. <u>Cooler Information</u> Cooler No Temp °C Condition Sea	Intact Seal No	Seal Date	Signed By								
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Chain-of-Custody Record	8		19	Pa	Ph	Й					B							_	_		_		/	\leq	If necessary, samples submitted to Hail Environmental may be subcontrated to other accredited taboratories. I his serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.
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`	client: Animos Environmente		Mailing Address: 1004	F	Phone #: 500 5	email or Fax#:	QA/QC Package:	Accreditation	D EDD (Type)	Date	2118/13											Date:	Date:	4/18/13 1/752	
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