

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

State of New Mexico  
Energy Minerals and Natural Resources  
Department  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 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.

Pit, Below-Grade Tank, or  
Proposed Alternative Method Permit or Closure Plan Application

- Type of action:
- ☐ Below grade tank registration
  - ☐ Permit of a pit or proposed alternative method
  - ☒ Closure of a pit, below-grade tank, or proposed alternative method
  - ☐ Modification to an existing permit/or registration
  - ☐ Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

**Instructions:** Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1. Operator: ConocoPhillips Company OGRID #: 217817  
Address: PO BOX 4289, Farmington, NM 87499  
Facility or well name: OHIO 1E  
API Number: 30-045-24037-24406 OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr G Section 22 Township 28N Range 11W County: San Juan  
Center of Proposed Design: Latitude 36.65013 °N Longitude -107.98830 °W NAD: ☐ 1927 ☒ 1983  
Surface Owner: ☒ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment

OIL CONS. DIV DIST. 3

JAN 31 2017

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 Fluid ☐ yes ☐ no  
☐ Lined ☐ Unlined Liner type: Thickness \_\_\_\_\_ mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other \_\_\_\_\_  
☐ String-Reinforced  
Liner Seams: ☐ Welded ☐ Factory ☐ Other \_\_\_\_\_ Volume: \_\_\_\_\_ bbl Dimensions: L \_\_\_\_\_ x W \_\_\_\_\_ x D \_\_\_\_\_

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

4. ☐ **Alternative Method:**  
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration 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, school, hospital, institution or church)  
☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet  
☐ Alternate. Please specify \_\_\_\_\_

6. **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

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

### **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  
☒ 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.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

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 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 (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 19.15.17.11 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 19.15.17.9 NMAC and 19.15.17.13 NMAC

☐ Previously Approved Design (attach copy of design) API Number: \_\_\_\_\_ or Permit Number: \_\_\_\_\_

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 documents are 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 19.15.17.9 NMAC 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: \_\_\_\_\_



12.7

**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

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 ☐ Multi-well Fluid Management Pit  
☐ 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

14.

**Waste Excavation and Removal Closure Plan Checklist:** (19.15.17.13 NMAC) **Instructions:** Each of the following items must be attached to the 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 source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> 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 plan. Please indicate, 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 19.15.17.11 NMAC  
☐ Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ 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 cannot be achieved)  
☐ 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  
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 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 belief.

Name (Print): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

e-mail address: \_\_\_\_\_ Telephone: \_\_\_\_\_

18.

**OCD Approval:** ☐ Permit Application (including closure plan) ☒ Closure Plan (only) ☐ OCD Conditions (see attachment)

OCD Representative Signature:  Approval Date: 2-1-2017

Title: Environmental Specialist OCD Permit Number: \_\_\_\_\_

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. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.*

☒ Closure Completion Date: 12/20/16

20.

**Closure Method:**

- ☒ Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-loop systems only)  
☐ If different from approved plan, please explain.

21.

**Closure Report Attachment Checklist:** *Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.*

- ☒ Proof of Closure Notice (surface owner and division)  
☐ Proof of Deed Notice (required for on-site closure for private land only)  
☐ Plot Plan (for on-site closures and temporary pits)  
☒ Confirmation Sampling Analytical Results (if applicable)  
☐ Waste Material Sampling Analytical Results (required for on-site closure)  
☐ Disposal Facility Name and Permit Number  
☒ Soil Backfilling and Cover Installation  
☒ Re-vegetation Application Rates and Seeding Technique  
☒ Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude \_\_\_\_\_ °N \_\_\_\_\_ Longitude \_\_\_\_\_ °W \_\_\_\_\_ NAD: ☐ 1927 ☐ 1983



**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) Christine Brock Title: Regulatory Specialist

Signature: Christine Brock Date: 11/26/17

e-mail address: christine.brock@cop.com Telephone: (505) 326-9775



**ConocoPhillips Company  
San Juan Basin  
Below Grade Tank Closure Report**

**Lease Name: OHIO 1E  
API No.: 30-045-24406**

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. COPC 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, COPC 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. COPC 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. COPC 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 COPC 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. COPC will test the soils beneath the below-grade tank to determine whether a release has occurred. COPC 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 COPC or the division determines that a release has occurred, then COPC 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 COPC 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:
- Operator's name
  - Location by Unit Letter, Section, Township, and Range. Well name and API number.

**Notification is attached.**

9. The surface owner shall be notified of COPC'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. COPC 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 be 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

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**From:** Busse, Dollie L  
**Sent:** Tuesday, December 13, 2016 7:32 AM  
**To:** 'Smith, Cory, EMNRD'; Vanessa.Fields@state.nm.us; 'Brandon.Powell@state.nm.us'  
**Cc:** Whitney Thomas - BLM (l1thomas@blm.gov); Maureen Joe (mjoe@blm.gov); Payne, Wendy F; Trujillo, Fasho D; Walker, Crystal; Brock, Christine  
**Subject:** Ohio 1E - 72 Hour BGT Closure Notification  
**Importance:** High

**Subject: 72 Hour BGT Closure Notification**

**Anticipated Start Date:** Tuesday, 12/20/2016 at approximately 9:00 a.m.

The subject well has a below-grade tank that will begin the closure process between 72 hours and one week from this notification. Please contact me at any time if you have any questions or concerns.

**Well Name:** Ohio 1E

**API#:** 3004524406

**Location:** Unit G (SWNE), Section 22, T28N, R11W

**Footages:** 1740' FNL & 1800' FEL

**Operator:** ConocoPhillips

**Surface Owner:** BLM (Lease #NM-020499)

**Reason:** P&A'd 7/14/2016

Dollie L. Busse  
Regulatory Technician  
ConocoPhillips Company  
505-324-6104  
505-787-9959  
[Dollie.L.Busse@cop.com](mailto:Dollie.L.Busse@cop.com)



District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
1301 W. Grand Avenue, 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  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-141  
Revised August 8, 2011

Submit 1 Copy to appropriate District Office to  
accordance with 19.15.29 NMAC.

### Release Notification and Corrective Action

#### OPERATOR

☐ Initial Report ☒ Final Report

Name of Company ConocoPhillips	Contact Christine Brock
Address 3401 East 30 <sup>th</sup> St, Farmington, NM	Telephone No.(505) 326-9775
Facility Name: Ohio 1E	Facility Type: Gas Well

Surface Owner Federal	Mineral Owner Federal	API No. 30-045-24406
-----------------------	-----------------------	----------------------

#### LOCATION OF RELEASE

Unit Letter G	Section 22	Township 28N	Range 11W	Feet from the 1740	North/South Line North	Feet from the 1800	East/West Line East	County San Juan
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Latitude 36.65013 Longitude -107.98830

#### NATURE OF RELEASE

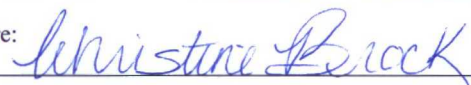
Type of Release	Volume of Release	Volume Recovered
Source of Release	Date and Hour of Occurrence	Date and Hour of Discovery
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*  
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 complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 	<u>OIL CONSERVATION DIVISION</u>		
Printed Name: Christine Brock	Approved by Environmental Specialist:		
Title: Regulatory Specialist	Approval Date:	Expiration Date:	
E-mail Address: christine.brock@cop.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 1/26/17 Phone: (505) 326-9775			

\* Attach Additional Sheets If Necessary

# **Rule** Engineering, LLC

Solutions to Regulations for Industry

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January 23, 2017

Mr. Robert Spearman  
ConocoPhillips  
San Juan Business Unit  
5525 Highway 64  
Farmington, New Mexico 87401

**Re: Ohio #1E  
Below Grade Tank Closure Sampling Report**

Dear Mr. Spearman:

This report summarizes the below grade tank (BGT) closure sampling activities conducted by Rule Engineering, LLC (Rule) at the ConocoPhillips Ohio #1E located in Unit Letter G, Section 22, Township 28N, Range 11W in San Juan County, New Mexico. Activities included collection and analysis of a 5-point composite soil confirmation sample from beneath the BGT on December 20, 2016. A topographic map of the location is included as Figure 1 and an aerial site map is included as Figure 2.

## **BGT Summary**

**Site Name** – Ohio #1E

**Location** – Unit Letter G, Section 22, Township 28N, Range 11W

**API Number** – 30-045-24406

**Wellhead Latitude/Longitude** – N36.65006 and W107.98808

**BGT Latitude/Longitude** – N36.65013 and W107.98830

**Land Jurisdiction** – Bureau of Land Management

**Size of BGT** – 120 barrels

**Date of BGT Closure Soil Sampling** – December 20, 2016

## **BGT Closure Standards**

As outlined in 19.15.17.13 New Mexico Administrative Code (NMAC), BGT closure standards for the Ohio #1E are as follows: 0.2 milligrams per kilogram (mg/kg) benzene, 50 mg/kg total benzene, toluene, ethylbenzene, and total xylenes (BTEX), 100 mg/kg total petroleum hydrocarbons (TPH), and 250 mg/kg chlorides.

## **Field Activities**

On December 20, 2016, following removal of the BGT, Rule personnel conducted a visual inspection for surface/subsurface indications of a release. No evidence of a release was observed. Rule personnel then collected five soil samples (S-1 through S-5) from 0.5 feet beneath the floor of the BGT excavation. Figure 2 provides the location of the soil samples collected from below the BGT. The field work summary sheet is attached.



### **Soil Sampling**

The five soil samples (S-1 through S-5) collected from below the floor of the BGT excavation were combined to create soil confirmation sample SC-1. A portion of SC-1 was field screened for volatile organic compounds (VOCs) and chlorides, and field analyzed for TPH.

Field screening for VOC vapors was conducted with a photo-ionization detector (PID). Prior to field screening, the PID was calibrated with 100 parts per million (ppm) isobutylene gas. Field analysis for TPH was conducted per U.S. Environmental Protection Agency (USEPA) Method 418.1, utilizing a total hydrocarbon analyzer. Prior to field analysis, the analyzer was calibrated following the manufacturer's procedure with includes calculation of a calibration curve using known concentration standards. Rule's reporting limit for TPH using this method is 20 mg/kg. Field screening for chloride was conducted using the Hach chloride low range test kit. Chloride concentrations were determined by drop count titration method using silver nitrate titrant.

The portion of SC-1 collected for laboratory analysis was placed into laboratory supplied glassware, labeled, and maintained on ice until delivery to Hall Environmental Analysis Laboratory in Albuquerque, New Mexico. The sample was analyzed for BTEX per USEPA Method 8021B, TPH per USEPA Method 418.1 and 8015M/D, and chlorides per USEPA Method 300.0.

### **Field and Analytical Results**

Field sampling results for soil confirmation sample SC-1 indicated a VOC concentration of 0.0 ppm and a TPH concentration below the reporting limit of 20 mg/kg. Field chloride concentrations were recorded at 60 mg/kg.

Laboratory analytical results for sample SC-1 reported benzene and total BTEX concentrations below the laboratory reporting limits of 0.024 mg/kg and 0.215 mg/kg, respectively. Laboratory analytical results for sample SC-1 reported the TPH concentrations below the laboratory reporting limit of 19 mg/kg by USEPA Method 418.1, below the laboratory reporting limit of 4.8 mg/kg as gasoline range organics per USEPA Method 8015D, and below the laboratory reporting limit of 9.7 mg/kg diesel range organics by USEPA Method 8015M/D. The laboratory analytical result for sample SC-1 for chloride concentration was reported below the laboratory reporting limit of 30 mg/kg. Field and laboratory results for sample SC-1 are summarized in Table 1, and the analytical laboratory report is attached.

### **Conclusions**

On December 20, 2016, BGT closure sampling activities were conducted at the ConocoPhillips Ohio #1E. Field and laboratory results for confirmation sample SC-1 were reported below the BGT closure standards for benzene, total BTEX, TPH, and chlorides as outlined in 19.15.17.13 NMAC. Based on field sampling and

Mr. Robert Spearman  
Ohio #1E BGT Closure Sampling Report  
January 23, 2017  
Page 3 of 3

laboratory analytical results, no release occurred from the BGT and no further work is recommended.

Rule Engineering appreciates the opportunity to provide services to ConocoPhillips. If you have any questions, please contact me at (505) 325-1055.

Sincerely,  
**Rule Engineering, LLC**



Heather M. Woods, P.G.  
Area Manager/Geologist

**Attachments:**

Table 1. BGT Soil Sampling Results  
Figure 1. Topographic Map  
Figure 2. Aerial Site Map  
Field Work Summary Sheet  
Analytical Laboratory Report



**Table 1. BGT Soil Sampling Results**  
**ConocoPhillips**  
**Ohio #1E**  
**San Juan County, New Mexico**

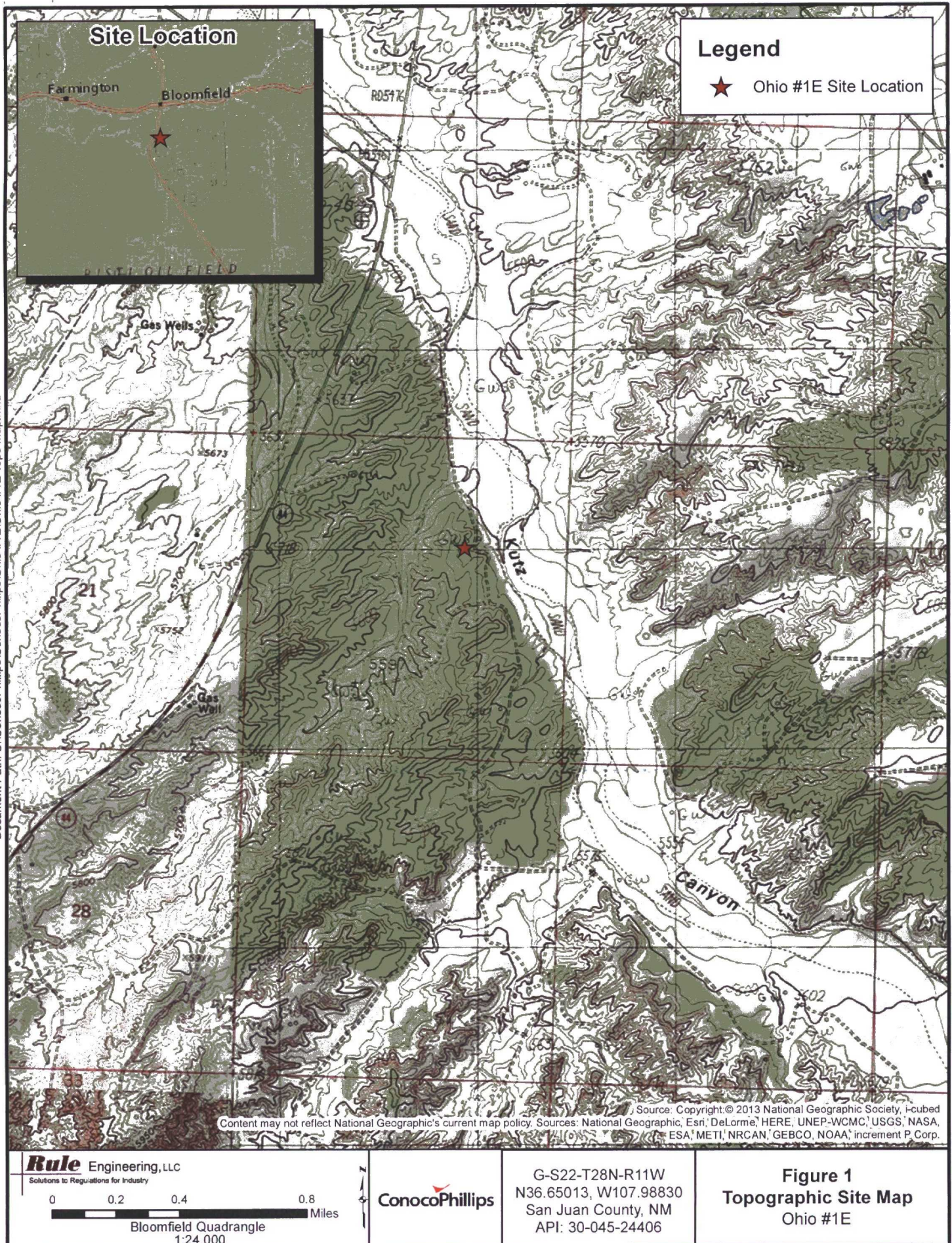
Sample ID	Date	Sample Type	Sample Depth (ft below BGT liner)	Field Sampling Results			Laboratory Analytical Results					
				VOCs (PID) (ppm)	TPH - 418.1 (mg/kg)	Chloride** (mg/kg)	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH - 418.1 (mg/kg)	TPH - GRO (mg/kg)	TPH - DRO (mg/kg)	Chloride*** (mg/kg)
BGT Closure Standards*				--	100	250	0.2	50	100	100		250
SC-1	12/20/16	Composite	0.5	0.0	<20	60	<0.024	<0.215	<19	<4.8	<9.7	<30

Notes: PID - photo-ionization detector  
ppm - parts per million  
mg/kg - milligrams/kilograms  
VOCs - volatile organic compounds  
\*19.15.17.13 NMAC  
\*\*Per Hach chloride low-range test kit  
\*\*\*Per USEPA Method 300.0 chlorides

BTEX - benzene, toluene, ethylbenzene, and total xylenes  
TPH - total petroleum hydrocarbons per USEPA Method 418.1  
GRO - gasoline range organics  
DRO - diesel range organics



Document Path: U:\ConocoPhillips\ConocoPhillips\Ohio #1E\Ohio #1E Topo Map.mxd





## Legend

-  Wellhead Monument
-  Soil Sample Location
-  Below Grade Tank (BGT)
-  Berm
-  Above Ground Storage Tank (AST)
-  Separator



Ohio #1E Below Grade Tank  
GPS: N36.65013, W107.98830

Ohio #1E Wellhead  
GPS: N36.65006, W107.98808

(Source: Google Maps)

**Rule** Engineering, LLC  
Solutions to Regulations for Industry

0 5 10 20 30 Feet  
1 inch = 15 feet

**ConocoPhillips**

G-S22-T28N-R11W  
N36.65013, W107.89930  
San Juan County, NM  
API: 30-045-24406

**Figure 2**  
**Aerial Site Map**  
Ohio #1E

## Rule Engineering Field Work Summary Sheet

Company: ConocoPhillips  
Location: Ohio #1E  
API: 30-045-24406  
Legals: G-S22-T28N-R11W  
County: San Juan  
Land Jurisdiction: Bureau of Land Management

Date: 12/20/16

Staff: Heather Woods

Wellhead GPS: 36.65006, -107.98808

BGT GPS: 36.65013, -107.98830

### Siting Information based on BGT Location:

Site Rank **30**

Groundwater: Estimated to be less than 50 feet below grade surface, based on elevation differential between location and local washes.

Surface Water: The wash of Kutz Canyon is located approximately 520 feet east of the location.

Wellhead Protection: No water wells identified within 1,000 feet of the location.

Objective: Closure sampling for BGT

Tank Size: 120 barrels, removed during closure activities

Liner: Liner present, removed during closure activities

Observations: No staining or odor was observed in the soils below the tank.

Notes: No NMOCD or BLM representatives were on location during sampling activities.

### Field Sampling Information

Name	Type of Sample	Collection Time	Collection Location	VOCs <sup>1</sup> (ppm)	VOCs time	TPH <sup>2</sup> mg/kg	TPH Time	Chloride <sup>3</sup> mg/kg	Chloride Time
SC-1	Composite	9:45	See below	0.0	9:50	<20	10:20	60	10:10

SC-1 is a 5-point composite of S-1 through S-5, collected 0.5 ft below BGT.

Sample SC-1 was laboratory analyzed for TPH (8015), BTEX (8021) and chlorides (300.0).



### Field Sampling Notes:

<sup>1</sup> Field screening for volatile organic compounds (VOC) vapors was conducted with a photo-ionization detector (PID). Before beginning field screening, the PID was calibrated with 100 parts per million (ppm) isobutylene gas.

<sup>2</sup> Field analysis for TPH was conducted using a total hydrocarbon analyzer. Prior to field analysis, the machine was calibrated following the manufacturer's procedure which includes calculation of a calibration curve using known concentration standards.

<sup>3</sup> Field screening for chlorides was conducted using the Hach chloride low range test kit. Chloride concentrations are determined by drop count titration method using silver nitrate titrant.





*Hall Environmental Analysis Laboratory  
4901 Hawkins NE  
Albuquerque, NM 87109  
TEL: 505-345-3975 FAX: 505-345-4107  
Website: [www.hallenvironmental.com](http://www.hallenvironmental.com)*

December 30, 2016

Heather Woods  
Rule Engineering LLC  
501 Airport Dr., Ste 205  
Farmington, NM 87401  
TEL: (505) 325-1055  
FAX

RE: CoP Ohio #1E

OrderNo.: 1612B38

Dear Heather Woods:

Hall Environmental Analysis Laboratory received 1 sample(s) on 12/21/2016 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 [www.hallenvironmental.com](http://www.hallenvironmental.com) 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 1612B38

Date Reported: 12/30/2016

## Hall Environmental Analysis Laboratory, Inc.

CLIENT: Rule Engineering LLC

Client Sample ID: SC-1

Project: CoP Ohio #1E

Collection Date: 12/20/2016 9:45:00 AM

Lab ID: 1612B38-001

Matrix: SOIL

Received Date: 12/21/2016 8:00:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
<b>EPA METHOD 418.1: TPH</b>							Analyst: <b>MAB</b>
Petroleum Hydrocarbons, TR	ND	19		mg/Kg	1	12/28/2016	29399
<b>EPA METHOD 300.0: ANIONS</b>							Analyst: <b>LGT</b>
Chloride	ND	30		mg/Kg	20	12/29/2016 1:43:16 AM	29448
<b>EPA METHOD 8015M/D: DIESEL RANGE ORGANICS</b>							Analyst: <b>TOM</b>
Diesel Range Organics (DRO)	ND	9.7		mg/Kg	1	12/23/2016 10:56:43 PM	29359
Motor Oil Range Organics (MRO)	ND	48		mg/Kg	1	12/23/2016 10:56:43 PM	29359
Surr: DNOP	96.4	70-130		%Rec	1	12/23/2016 10:56:43 PM	29359
<b>EPA METHOD 8015D: GASOLINE RANGE</b>							Analyst: <b>NSB</b>
Gasoline Range Organics (GRO)	ND	4.8		mg/Kg	1	12/23/2016 9:29:34 PM	29352
Surr: BFB	92.3	68.3-144		%Rec	1	12/23/2016 9:29:34 PM	29352
<b>EPA METHOD 8021B: VOLATILES</b>							Analyst: <b>NSB</b>
Benzene	ND	0.024		mg/Kg	1	12/23/2016 9:29:34 PM	29352
Toluene	ND	0.048		mg/Kg	1	12/23/2016 9:29:34 PM	29352
Ethylbenzene	ND	0.048		mg/Kg	1	12/23/2016 9:29:34 PM	29352
Xylenes, Total	ND	0.095		mg/Kg	1	12/23/2016 9:29:34 PM	29352
Surr: 4-Bromofluorobenzene	101	80-120		%Rec	1	12/23/2016 9:29:34 PM	29352

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

<b>Qualifiers:</b>	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	D	Sample Diluted Due to Matrix	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
	R	RPD outside accepted recovery limits	RL	Reporting Detection Limit
	S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified



# QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1612B38

30-Dec-16

Client: Rule Engineering LLC

Project: CoP Ohio #1E

Sample ID	MB-29448	SampType:	MBLK	TestCode:	EPA Method 300.0: Anions					
Client ID:	PBS	Batch ID:	29448	RunNo:	39709					
Prep Date:	12/28/2016	Analysis Date:	12/28/2016	SeqNo:	1244207	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	LCS-29448	SampType:	LCS	TestCode:	EPA Method 300.0: Anions					
Client ID:	LCSS	Batch ID:	29448	RunNo:	39709					
Prep Date:	12/28/2016	Analysis Date:	12/28/2016	SeqNo:	1244208	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	92.0	90	110			

## 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
- W Sample container temperature is out of limit as specified

# QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1612B38

30-Dec-16

Client: Rule Engineering LLC

Project: CoP Ohio #1E

Sample ID	MB-29399	SampType:	MBLK	TestCode:	EPA Method 418.1: TPH					
Client ID:	PBS	Batch ID:	29399	RunNo:	39677					
Prep Date:	12/27/2016	Analysis Date:	12/28/2016	SeqNo:	1243246	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	ND	20								

Sample ID	LCS-29399		SampType: LCS		TestCode: EPA Method 418.1: TPH					
Client ID:	LCSS		Batch ID: 29399		RunNo: 39677					
Prep Date:	12/27/2016		Analysis Date: 12/28/2016		SeqNo: 1243247		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	94	20	100.0	0	93.9	80.7	121			

Sample ID	LCSD-29399	SampType: LCSD			TestCode: EPA Method 418.1: TPH					
Client ID:	LCSS02	Batch ID: 29399			RunNo: 39677					
Prep Date:	12/27/2016	Analysis Date: 12/28/2016			SeqNo: 1243248		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Petroleum Hydrocarbons, TR	96	20	100.0	0	96.4	80.7	121	2.69	20	

## Qualifiers:

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



# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1612B38

30-Dec-16

Client: Rule Engineering LLC

Project: CoP Ohio #1E

Sample ID	LCS-29335		SampType: LCS		TestCode: EPA Method 8015M/D: Diesel Range Organics					
Client ID:	LCSS		Batch ID: 29335		RunNo: 39589					
Prep Date:	12/21/2016		Analysis Date: 12/23/2016		SeqNo: 1240743		Units: %Rec			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	4.7		5.000		93.9	70	130			

Sample ID	MB-29335		SampType: MBLK		TestCode: EPA Method 8015M/D: Diesel Range Organics					
Client ID:	PBS		Batch ID: 29335		RunNo: 39589					
Prep Date:	12/21/2016		Analysis Date: 12/23/2016		SeqNo: 1240744		Units: %Rec			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	9.3		10.00		92.9	70	130			

Sample ID	1612B38-001AMS		SampType: MS		TestCode: EPA Method 8015M/D: Diesel Range Organics					
Client ID:	SC-1		Batch ID: 29359		RunNo: 39589					
Prep Date:	12/22/2016		Analysis Date: 12/23/2016		SeqNo: 1241846		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	45	9.8	49.12	0	91.5	51.6	130			
Surr: DNOP	4.5		4.912		91.5	70	130			

Sample ID	1612B38-001AMSD		SampType: MSD		TestCode: EPA Method 8015M/D: Diesel Range Organics					
Client ID:	SC-1		Batch ID: 29359		RunNo: 39589					
Prep Date:	12/22/2016		Analysis Date: 12/23/2016		SeqNo: 1241847		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	46	9.8	49.16	0	93.3	51.6	130	1.98	20	
Surr: DNOP	4.5		4.916		91.2	70	130	0	0	

Sample ID	LCS-29359		SampType: LCS		TestCode: EPA Method 8015M/D: Diesel Range Organics					
Client ID:	LCSS		Batch ID: 29359		RunNo: 39589					
Prep Date:	12/22/2016		Analysis Date: 12/23/2016		SeqNo: 1241856		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	44	10	50.00	0	88.3	63.8	116			
Surr: DNOP	4.3		5.000		86.0	70	130			

Sample ID	MB-29359	SampType: MBLK			TestCode: EPA Method 8015M/D: Diesel Range Organics					
Client ID:	PBS	Batch ID: 29359			RunNo: 39589					
Prep Date:	12/22/2016	Analysis Date: 12/23/2016			SeqNo: 1241857		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Motor Oil Range Organics (MRO)	ND	50								

### 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
- W Sample container temperature is out of limit as specified

# QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1612B38

30-Dec-16

Client: Rule Engineering LLC

Project: CoP Ohio #1E

Sample ID	MB-29359		SampType: MBLK		TestCode: EPA Method 8015M/D: Diesel Range Organics					
Client ID:	PBS		Batch ID: 29359		RunNo: 39589					
Prep Date:	12/22/2016		Analysis Date: 12/23/2016		SeqNo: 1241857		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	9.4		10.00		94.4	70	130			

Sample ID	LCS-29384		SampType: LCS		TestCode: EPA Method 8015M/D: Diesel Range Organics					
Client ID:	LCSS		Batch ID: 29384		RunNo: 39672					
Prep Date:	12/23/2016		Analysis Date: 12/28/2016		SeqNo: 1243438		Units: %Rec			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	4.1		5.000		82.6	70	130			

Sample ID	MB-29384		SampType: MBLK		TestCode: EPA Method 8015M/D: Diesel Range Organics					
Client ID:	PBS		Batch ID: 29384		RunNo: 39672					
Prep Date:	12/23/2016		Analysis Date: 12/28/2016		SeqNo: 1243440		Units: %Rec			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: DNOP	8.7		10.00		86.6	70	130			

## Qualifiers:

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



# QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1612B38

30-Dec-16

Client: Rule Engineering LLC

Project: CoP Ohio #1E

Sample ID	MB-29352	SampType: MBLK			TestCode: EPA Method 8015D: Gasoline Range					
Client ID:	PBS	Batch ID: 29352			RunNo: 39645					
Prep Date:	12/22/2016	Analysis Date: 12/23/2016			SeqNo: 1241888		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	930		1000		92.5	68.3	144			

Sample ID	LCS-29352		SampType: LCS		TestCode: EPA Method 8015D: Gasoline Range					
Client ID:	LCSS		Batch ID: 29352		RunNo: 39645					
Prep Date:	12/22/2016		Analysis Date: 12/23/2016		SeqNo: 1241889		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	26	5.0	25.00	0	106	74.6	123			
Surr: BFB	1000		1000		101	68.3	144			

Sample ID	MB-29391	SampType: MBLK			TestCode: EPA Method 8015D: Gasoline Range					
Client ID:	PBS	Batch ID: 29391			RunNo: 39665					
Prep Date:	12/23/2016	Analysis Date: 12/27/2016			SeqNo: 1242742		Units: %Rec			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: BFB	950		1000		94.8	68.3	144			

Sample ID	LCS-29391		SampType: LCS		TestCode: EPA Method 8015D: Gasoline Range					
Client ID:	LCSS		Batch ID: 29391		RunNo: 39665					
Prep Date:	12/23/2016		Analysis Date: 12/27/2016		SeqNo: 1242743		Units: %Rec			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: BFB	1000		1000		99.6	68.3	144			

Sample ID	MB-29392		SampType: MBLK		TestCode: EPA Method 8015D: Gasoline Range					
Client ID:	PBS		Batch ID: 29392		RunNo: 39665					
Prep Date:	12/23/2016		Analysis Date: 12/27/2016		SeqNo: 1242756		Units: %Rec			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: BFB	980		1000		98.3	68.3	144			

Sample ID	LCS-29392		SampType: LCS		TestCode: EPA Method 8015D: Gasoline Range					
Client ID:	LCSS		Batch ID: 29392		RunNo: 39665					
Prep Date:	12/23/2016		Analysis Date: 12/27/2016		SeqNo: 1242758		Units: %Rec			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: BFB	1100		1000		106	68.3	144			

## Qualifiers:

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

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1612B38

30-Dec-16

Client: Rule Engineering LLC

Project: CoP Ohio #1E

Sample ID	<b>MB-29352</b>		SampType:	<b>MBLK</b>		TestCode:	<b>EPA Method 8021B: Volatiles</b>			
Client ID:	<b>PBS</b>		Batch ID:	<b>29352</b>		RunNo:	<b>39645</b>			
Prep Date:	<b>12/22/2016</b>		Analysis Date:	<b>12/23/2016</b>		SeqNo:	<b>1241930</b>		Units: <b>mg/Kg</b>	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.025								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	1.0		1.000		103	80	120			

Sample ID	<b>LCS-29352</b>		SampType:	<b>LCS</b>		TestCode:	<b>EPA Method 8021B: Volatiles</b>			
Client ID:	<b>LCSS</b>		Batch ID:	<b>29352</b>		RunNo:	<b>39645</b>			
Prep Date:	<b>12/22/2016</b>		Analysis Date:	<b>12/23/2016</b>		SeqNo:	<b>1241931</b>		Units: <b>mg/Kg</b>	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	1.1	0.025	1.000	0	108	75.2	115			
Toluene	1.0	0.050	1.000	0	102	80.7	112			
Ethylbenzene	0.98	0.050	1.000	0	98.3	78.9	117			
Xylenes, Total	3.0	0.10	3.000	0	98.6	79.2	115			
Surr: 4-Bromofluorobenzene	1.1		1.000		110	80	120			

Sample ID	<b>1612B38-001AMS</b>		SampType:	<b>MS</b>		TestCode:	<b>EPA Method 8021B: Volatiles</b>			
Client ID:	<b>SC-1</b>		Batch ID:	<b>29352</b>		RunNo:	<b>39645</b>			
Prep Date:	<b>12/22/2016</b>		Analysis Date:	<b>12/23/2016</b>		SeqNo:	<b>1241933</b>		Units: <b>mg/Kg</b>	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	1.2	0.025	0.9921	0	120	61.5	138			
Toluene	1.1	0.050	0.9921	0	114	71.4	127			
Ethylbenzene	1.1	0.050	0.9921	0	110	70.9	132			
Xylenes, Total	3.3	0.099	2.976	0	112	76.2	123			
Surr: 4-Bromofluorobenzene	1.1		0.9921		107	80	120			

Sample ID	<b>1612B38-001AMSD</b>		SampType:	<b>MSD</b>		TestCode:	<b>EPA Method 8021B: Volatiles</b>			
Client ID:	<b>SC-1</b>		Batch ID:	<b>29352</b>		RunNo:	<b>39645</b>			
Prep Date:	<b>12/22/2016</b>		Analysis Date:	<b>12/23/2016</b>		SeqNo:	<b>1241934</b>		Units: <b>mg/Kg</b>	
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	1.1	0.023	0.9217	0	117	61.5	138	9.80	20	
Toluene	1.0	0.046	0.9217	0	111	71.4	127	9.81	20	
Ethylbenzene	1.0	0.046	0.9217	0	108	70.9	132	9.35	20	
Xylenes, Total	3.0	0.092	2.765	0	109	76.2	123	9.93	20	
Surr: 4-Bromofluorobenzene	1.0		0.9217		108	80	120	0	0	

### Qualifiers:

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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  
W Sample container temperature is out of limit as specified



# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1612B38

30-Dec-16

Client: Rule Engineering LLC

Project: CoP Ohio #1E

Sample ID	MB-29391		SampType: MBLK		TestCode: EPA Method 8021B: Volatiles					
Client ID:	PBS		Batch ID: 29391		RunNo: 39665					
Prep Date:	12/23/2016		Analysis Date: 12/27/2016		SeqNo: 1242788		Units: %Rec			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: 4-Bromofluorobenzene	1.1		1.000		109	80	120			

Sample ID	LCS-29391		SampType: LCS		TestCode: EPA Method 8021B: Volatiles					
Client ID:	LCSS		Batch ID: 29391		RunNo: 39665					
Prep Date:	12/23/2016		Analysis Date: 12/27/2016		SeqNo: 1242789		Units: %Rec			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: 4-Bromofluorobenzene	1.1		1.000		110	80	120			

### Qualifiers:

\* Value exceeds Maximum Contaminant Level.  
D Sample Diluted Due to Matrix  
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RL Reporting Detection Limit  
W Sample container temperature is out of limit as specified



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

## Sample Log-In Check List

Client Name: RULE ENGINEERING LL

Work Order Number: 1612B38

RcptNo: 1

Received by/date:

HJ 12/21/16

Logged By: Anne Thorne

12/26/2016 2:07:00 PM

Completed By: Anne Thorne

12/21/2016 1:33:59 PM

Reviewed By:

aj

12/22/16

12/21/16 0800  
ju Anne Thorne  
12/22/16 Anne Thorne

### 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

### Log In

4. Was an attempt made to cool the samples? Yes ☒ No ☐ NA ☐
5. Were all samples received at a temperature of  $>0^{\circ}\text{C}$  to  $6.0^{\circ}\text{C}$ ? Yes ☒ No ☐ NA ☐
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 broken? Yes ☐ No ☒
12. Does paperwork match bottle labels?  
(Note discrepancies on chain of custody) Yes ☒ No ☐
13. Are matrices correctly identified on Chain of Custody? Yes ☒ No ☐
14. Is it clear what analyses were requested? Yes ☒ No ☐
15. Were all holding times able to be met?  
(If no, notify customer for authorization.) Yes ☒ No ☐

# of preserved  
bottles checked  
for pH: \_\_\_\_\_  
( $<2$  or  $>12$  unless noted)  
Adjusted? \_\_\_\_\_  
Checked by: \_\_\_\_\_

### Special Handling (if applicable)

16. Was client notified of all discrepancies with this order? Yes ☐ No ☒ NA ☐

Person Notified:	_____	Date:	_____
By Whom:	_____	Via:	<input type="checkbox"/> eMail <input type="checkbox"/> Phone <input type="checkbox"/> Fax <input type="checkbox"/> In Person
Regarding:	_____		
Client Instructions:	_____		

17. Additional remarks:

### 18. Cooler Information

Cooler No	Temp $^{\circ}\text{C}$	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	1.0	Good	Yes			



Client: Rule Engineering, LLC

Mailing Address: 501 Airport Dr., Suite 205  
Farmington, NM 87401

Phone #: (505) 716-2787

email or Fax#: huyons@ruleengineering.com

QA/QC Package:

☒ Standard ☐ Level 4 (Full Validation)

Accreditation

☐ NELAP ☐ Other \_\_\_\_\_

☐ EDD (Type) \_\_\_\_\_

Sample Temperature: 1.0°C

[illegible][illegible]

Date:	Time:	Relinquished by:
12/20/16	1721	Heath M. Wood

Date:	Time:	Relinquished by:
12/20/16	1824	Christ Walz

Received by:	Date	Time
Christa Webb	12/20/16	1721

Received by: [Signature] Date 12/21/16 Time 0800

Remarks:  
Direct bill to ConocoPhillips  
WO: 10390387      Ordered by: Bobby Spearman  
User: KGARCIA  
Area: Z

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.

