

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

15928
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: LUCERNE D 1 - NORTH TANK
API Number: 30-045-07278 OCD Permit Number: _____
U/L or Qtr/Qtr P Section 21 Township 28N Range 11W County: San Juan
Center of Proposed Design: Latitude 36.64282 °N Longitude -108.00308 °W NAD: ☐ 1927 ☒ 1983
Surface Owner: ☒ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment

OIL CONS. DIV DIST. 3
MAY 18 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 _____

X Submit Separate C-141

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 Unspecified 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 _____

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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

| | |
|---|--|
| <p>Within 100 feet of a wetland.</p> <ul style="list-style-type: none"> - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <p><u>Temporary Pit Non-low chloride drilling fluid</u></p> | |
| <p>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).</p> <ul style="list-style-type: none"> - Topographic map; Visual inspection (certification) of the proposed site | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <p>Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <ul style="list-style-type: none"> - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <p>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;</p> <ul style="list-style-type: none"> - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <p>Within 300 feet of a wetland.</p> <ul style="list-style-type: none"> - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <p><u>Permanent Pit or Multi-Well Fluid Management Pit</u></p> | |
| <p>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).</p> <ul style="list-style-type: none"> - Topographic map; Visual inspection (certification) of the proposed site | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <p>Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <ul style="list-style-type: none"> - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <p>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.</p> <ul style="list-style-type: none"> - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <p>Within 500 feet of a wetland.</p> <ul style="list-style-type: none"> - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site | <input type="checkbox"/> Yes <input type="checkbox"/> 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.

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 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 ☐ 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 | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within a 100-year floodplain. - FEMA map | <input type="checkbox"/> Yes <input type="checkbox"/> 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.*

| |
|---|
| <input type="checkbox"/> Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC |
| <input type="checkbox"/> Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC |
| <input type="checkbox"/> Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 NMAC |
| <input type="checkbox"/> 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 |
| <input type="checkbox"/> Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC |
| <input type="checkbox"/> Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC |
| <input type="checkbox"/> Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC |
| <input type="checkbox"/> Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved) |
| <input type="checkbox"/> Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC |
| <input type="checkbox"/> Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC |
| <input type="checkbox"/> 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: Danessa Approval Date: 7/31/2017

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: 1/31/2017

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.*

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

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

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) Christine Brock Title: Regulatory Specialist

Signature: Christine Brock Date: 5/16/17

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

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

Lease Name: Lucerne D 1 – North Tank

API No.: 30-045-07278

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.

5/16/2017

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 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:
 - i. Operator's name
 - ii. Location by Unit Letter, Section, Township, and Range. Well name and API number.

Notification is attached.

9. The surface owner shall be notified of 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)**

Brock, Christine

From: Brock, Christine
Sent: Thursday, January 26, 2017 7:55 AM
To: Cory Smith (cory.smith@state.nm.us); Vanessa Field (Vanessa.Fields@state.nm.us); 'Brandon.Powell@state.nm.us'
Cc: Farrell, Juanita R; Jones, Lisa; Payne, Wendy F; Trujillo, Fasho D; Brock, Christine; Busse, Dollie L; Walker, Crystal
Subject: 72 Hour BGT Closure Notification - Lucerne D 1
Importance: High

Subject: 72 Hour BGT Closure Notification

Anticipated Start Date: Tuesday, 1/31/2017 at approximately 10:00 a.m.

The subject well has 2 below-grade tanks 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: Lucerne D 1

API#: 30045507278

Location: Unit P (SESE), Section 21, T28N, R11W

Footages: 945' FSL & 870' FEL

Operator: ConocoPhillips

Surface Owner: BLM (Lease #SF-010063)

Reason: P&A'd 12/5/2016

Christine Brock
Regulatory Specialist
ConocoPhillips Company
505-326-9775
505-320-8485
Christine.Brock@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 Company | Contact Lisa Hunter |
| Address 3401 East 30th St, Farmington, NM | Telephone No. (505) 258-1607 |
| Facility Name: Lucerne D #1 | Facility Type: Gas Well |

| | | |
|--------------------------|--------------------------------------|---------------------------|
| Surface Owner BLM | Mineral Owner BLM (SF-010063) | API No. 3004507278 |
|--------------------------|--------------------------------------|---------------------------|

LOCATION OF RELEASE

| | | | | | | | | |
|-------------------------|----------------------|------------------------|---------------------|-----------------------------|----------------------------------|-----------------------------|-------------------------------|---------------------------|
| Unit Letter P | Section 21 | Township 28N | Range 11W | Feet from the 945 | North/South Line South | Feet from the 870 | East/West Line East | County San Juan |
|-------------------------|----------------------|------------------------|---------------------|-----------------------------|----------------------------------|-----------------------------|-------------------------------|---------------------------|

Latitude 36.64282 Longitude -108.00308

NATURE OF RELEASE

| | | |
|--|---|---|
| Type of Release Hydrocarbon | Volume of Release Unknown | Volume Recovered 80 c/yds |
| Source of Release Below Grade Tank (Closure) – North BGT | Date and Hour of Occurrence Unknown | Date and Hour of Discovery January 31, 2017 @ 9:00 a.m. |
| Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required | If YES, To Whom? N/A | |
| By Whom? N/A | Date and Hour N/A | |
| Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | If YES, Volume Impacting the Watercourse. N/A | |

If a Watercourse was Impacted, Describe Fully.*
N/A

Describe Cause of Problem and Remedial Action Taken.*


Below-Grade Tank Closure activities with samples taken resulting in constituents exceeded standards outlined by 19.15.17.13 NMAC.

Describe Area Affected and Cleanup Action Taken.*

NMOCD action levels for releases are specified in NMOCD's Guidelines for Leaks, Spills and Releases and the release was assigned a ranking score of 10. Samples were collected and analytical results are below applicable NMOCD action levels. No further work will be performed. The final report is attached for review.

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

OIL CONSERVATION DIVISION

| | | | |
|--|---------------------------------------|------------------|-----------------------------------|
| Signature:  | Approved by Environmental Specialist: | | |
| Printed Name: Lisa Hunter | | | |
| Title: Field Environmental Specialist | Approval Date: | Expiration Date: | |
| E-mail Address: Lisa.Hunter@cop.com | Conditions of Approval: | | Attached <input type="checkbox"/> |
| Date: March 28, 2017 Phone: (505) 258-1607 | | | |

* Attach Additional Sheets If Necessary

Rule Engineering, LLC

Solutions to Regulations for Industry

March 28, 2017

Ms. Lisa Hunter
ConocoPhillips
San Juan Business Unit
5525 Highway 64
Farmington, New Mexico 87401

**Re: Lucerne D #1 – North Below Grade Tank
Below Grade Tank Closure Sampling Report**

Dear Ms. Hunter:

This report summarizes the below grade tank (BGT) closure sampling activities conducted by Rule Engineering, LLC (Rule) at the ConocoPhillips Lucerne D #1 North BGT located in Unit Letter P, Section 21, Township 28N, Range 11W in San Juan County, New Mexico. Activities included collection and analysis of two 5-point composite soil confirmation samples from beneath the BGT on January 31, 2017. Note that the BGT closure activities were conducted on the same day as BGT closure activities for a second BGT on the same location; details of the activities for the second BGT are included in a separate report. 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 – Lucerne D #1 North Below Grade Tank

Location – Unit Letter P, Section 21, Township 28N, Range 11W

API Number – 30-045-07278

Wellhead Latitude/Longitude – N36.64287 and W108.00327

BGT Latitude/Longitude – N36.64282 and W108.00308

Land Jurisdiction – Bureau of Land Management

Size of BGT – Approximately 80 barrels

Date of BGT Closure Soil Sampling – January 31, 2017

BGT Closure Standards and NMOCD Site Ranking

As outlined in 19.15.17.13 New Mexico Administrative Code (NMAC), BGT closure standards for the Lucerne D #1 North BGT 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.

In accordance with the New Mexico Oil Conservation Division (NMOCD) Guidelines for Remediation of Leaks, Spills, and Releases (August 1993), this site was assigned a ranking score of 10. Depth to groundwater at the site is greater than 100 feet based on the elevation differential between the location and local washes,

and reported depths to groundwater from local cathodic reports. A review of the New Mexico Office of the State Engineer (NMOSE) online New Mexico Water Rights Reporting System and an onsite visual inspection identified no water wells within a 1,000 foot radius of the site. An ephemeral wash traverses the area approximately 660 feet southeast of the location. Based on the ranking score of 10, action levels for remediated soils at the site are as follows: 10 mg/kg benzene, 50 mg/kg total BTEX, and 1,000 mg/kg TPH.

Field Activities

On January 31, 2017, following removal of the BGT and liner, Rule personnel conducted a visual inspection for surface/subsurface indications of a release. No excess moisture was observed, however some discoloration was present in the soils below the tank. Rule personnel then collected one five-point composite sample 0.5 feet beneath the floor of the BGT excavation (BGTN-1). Approximately three feet of discolored soils were excavated and a second five-point composite sample was collected (BGTN-2). Excavated soils were transported to a local NMOCD approved landfarm for disposal/remediation and the excavation was backfilled with clean, imported material. Figure 2 provides the location of the soil samples collected from below the BGT. The field work summary sheet is attached.

Soil Sampling

Two composite soil samples, BGTN-1 and BGTN-2, were collected from below the floor of the BGT excavation at 0.5 feet and 3 feet below the floor of the BGT excavation, respectively. A portion of each sample 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 which 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 portions of the samples collected for laboratory analysis were placed into laboratory supplied glassware, labeled, and maintained on ice until delivery to Hall Environmental Analysis Laboratory in Albuquerque, New Mexico. The samples were 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 BGTN-1 indicated a VOC concentration of 1.0 ppm, a TPH concentration of 150 mg/kg, and a field chloride concentration was recorded at 180 mg/kg. Field sampling results for soil confirmation sample BGTN-2 indicated a VOC concentration of 0.8 ppm, a TPH concentration of 178 mg/kg, and a field chloride concentration of 180 mg/kg.

Laboratory analytical results for samples BGTN-1 and BGTN-2 reported benzene and total BTEX concentrations below the laboratory reporting limits, which are below the applicable BGT closure standards and NMOCD action levels. For sample BGTN-1, laboratory analytical results for TPH concentrations were 140 mg/kg per USEPA Method 418.1, and less than 3.6 mg/kg gasoline range organics (GRO), 89 mg/kg diesel range organics (DRO), and 140 mg/kg mineral oil range organics (MRO) per USEPA 8015M/D. For sample BGTN-2, laboratory analytical results for TPH concentrations were 220 mg/kg per USEPA Method 418.1, and less than 4.1 mg/kg gasoline range organics (GRO), 100 mg/kg diesel range organics (DRO), and 170 mg/kg mineral oil range organics (MRO) per USEPA 8015M/D. These TPH concentrations are above the BGT closure standards but below the NMOCD action levels for a site rank of 10. Laboratory analytical results for BGTN-1 and BGTN-2 reported chloride concentrations as below the laboratory reporting limit of 30, which is below the BGT closure standard. Field and laboratory results are summarized in Table 1, and the analytical laboratory report is attached.

Conclusions

On January 31, 2017, BGT closure sampling activities were conducted at the ConocoPhillips Lucerne D #1 North BGT. Field and laboratory results for confirmation sample BGTN-1 and BGTN-2 were reported benzene, total BTEX and chloride concentrations below the BGT closure standards. Field and laboratory results for the two samples reported TPH concentrations in excess of the BGT closure standard, but below the NMOCD action level for a site rank of 10. Discolored soils from the base of the BGT cellar have been transported to a local NMOCD landfarm for disposal/remediation. Based on field sampling and laboratory analytical results, 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

Rule

Ms. Lisa Hunter
Lucerne D #1 North BGT Closure Sampling Report
March 28, 2017
Page 4 of 4

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
Lucerne D #1 North Below Grade Tank
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) | TPH - MRO (mg/kg) | Chloride** (mg/kg) |
| BGT Closure Standards* | | | | -- | 100 | 250 | 0.2 | 50 | 100 | -- | | | 250 |
| NMOCD Action Level† | | | | 100 | 1,000 | -- | 10 | 50 | 1,000 | 1,000 | | | -- |
| BGTN-1 | 1/31/17 | Composite | 0.5 | 1.0 | 150 | 180 | <0.018 | <0.161 | 140 | <3.6 | 89 | 140 | <30 |
| BGTN-2 | 1/31/17 | Composite | 3.0 | 0.8 | 178 | 180 | <0.020 | <0.183 | 220 | <4.1 | 100 | 170 | <30 |

Notes: ppm - parts per million
mg/kg - milligrams/kilograms
PID - photo-ionization detector

NMOCD - New Mexico Oil Conservation Division

*19.15.17.13 NMAC

**Per Hach chloride low-range test kit

***Per USEPA Method 300.0 chlorides

†Based on the NMOCD Guidelines for Remediation of Leaks, Spills and Releases (August 1993)

VOCs - volatile organic compounds

BTEX - benzene, toluene, ethylbenzene, and total xylenes

TPH - total petroleum hydrocarbons

GRO - gasoline range organics

DRO - diesel range organics

MRO - mineral oil range organics



Rule Engineering, LLC
Solutions to Regulations for Industry

0 0.2 0.4 0.8
Miles
Horn Canyon Quadrangle
1:24,000

ConocoPhillips

P-S21-T28N-R11W
N36.64266, W108.00321
San Juan County, NM
API: 30-045-07278

Figure 1
Topographic Site Map
Lucerne D #1 North BGT



Rule Engineering Field Work Summary Sheet

Company: ConocoPhillips
Location: Lucerne D #1 (North BGT)
API: 30-045-07278
Legals: P-S21-T28N-R11W
County: San Juan
Land Jurisdiction: Bureau of Land Management

Date: 1/31/17

Staff: Heather Woods

Wellhead GPS: 36.64287, -108.00327

BGT GPS: 36.64282, -108.00308

Siting Information based on BGT Location:

Site Rank **10**

Groundwater: Estimated to be greater than 100 feet below grade surface, based on elevation differential between location and local washes, and reported depths to groundwater from local cathodic reports.

Surface Water: An ephemeral wash traverses the area approximately 660 feet southeast of the location.

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

Objective: Closure sampling for BGT

Tank Size: Approximately 90 barrels, removed during closure activities

Liner: Liner present, removed during closure activities

Observations: No excess moisture, but some discoloration, was observed below the tank.

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

Field Sampling Information

| Name | Type of Sample | Collection Time | Collection Location | VOCs ¹ (ppm) | VOCs time | TPH ² mg/kg | TPH Time | Chloride ³ mg/kg | Chloride Time |
|--------|----------------|-----------------|---------------------|-------------------------|-----------|------------------------|----------|-----------------------------|---------------|
| BGTN-1 | Composite | 10:42 | See below | 1.0 | 10:45 | 150 | 11:00 | 180 | 11:03 |
| BGTN-2 | Composite | 12:15 | See below | 0.8 | 12:17 | 178 | 12:45 | 180 | 12:48 |

BGTN-1 and BGTN-2 are 5-point composites of S-1 through S-5, collected 0.5 ft and 3 ft below BGT, respectively. Samples BGTN-1 and BGTN-2 were laboratory analyzed for TPH (8015/418.1), BTEX (8021) and chlorides (300.0).



Field Sampling Notes:

¹ 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.

² 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.

³ 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

February 02, 2017

Heather Woods

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

RE: COP Lucerne D #1

OrderNo.: 1702003

Dear Heather Woods:

Hall Environmental Analysis Laboratory received 2 sample(s) on 2/1/2017 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 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,

A handwritten signature in black ink, appearing to read "Andy Freeman", is written over a horizontal line.

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Hall Environmental Analysis Laboratory, Inc.

Analytical Report

Lab Order 1702003

Date Reported: 2/2/2017

CLIENT: Rule Engineering LLC

Client Sample ID: BGTN-1

Project: COP Lucerne D #1

Collection Date: 1/31/2017 10:42:00 AM

Lab ID: 1702003-001

Matrix: MEOH (SOIL)

Received Date: 2/1/2017 8:00:00 AM

| Analyses | Result | PQL | Qual | Units | DF | Date Analyzed | Batch |
|--|--------|----------|------|-------|----|----------------------|-------|
| EPA METHOD 418.1: TPH | | | | | | Analyst: MAB | |
| Petroleum Hydrocarbons, TR | 140 | 19 | | mg/Kg | 1 | 2/1/2017 11:00:00 AM | 29989 |
| EPA METHOD 300.0: ANIONS | | | | | | Analyst: MRA | |
| Chloride | ND | 30 | | mg/Kg | 20 | 2/1/2017 11:22:54 AM | 29997 |
| EPA METHOD 8015M/D: DIESEL RANGE ORGANICS | | | | | | Analyst: TOM | |
| Diesel Range Organics (DRO) | 89 | 9.8 | | mg/Kg | 1 | 2/1/2017 1:00:32 PM | 29988 |
| Motor Oil Range Organics (MRO) | 140 | 49 | | mg/Kg | 1 | 2/1/2017 1:00:32 PM | 29988 |
| Surr: DNOP | 124 | 70-130 | | %Rec | 1 | 2/1/2017 1:00:32 PM | 29988 |
| EPA METHOD 8015D: GASOLINE RANGE | | | | | | Analyst: NSB | |
| Gasoline Range Organics (GRO) | ND | 3.6 | | mg/Kg | 1 | 2/1/2017 1:10:06 PM | 29940 |
| Surr: BFB | 87.8 | 68.3-144 | | %Rec | 1 | 2/1/2017 1:10:06 PM | 29940 |
| EPA METHOD 8021B: VOLATILES | | | | | | Analyst: NSB | |
| Benzene | ND | 0.018 | | mg/Kg | 1 | 2/1/2017 1:10:06 PM | 29940 |
| Toluene | ND | 0.036 | | mg/Kg | 1 | 2/1/2017 1:10:06 PM | 29940 |
| Ethylbenzene | ND | 0.036 | | mg/Kg | 1 | 2/1/2017 1:10:06 PM | 29940 |
| Xylenes, Total | ND | 0.071 | | mg/Kg | 1 | 2/1/2017 1:10:06 PM | 29940 |
| Surr: 4-Bromofluorobenzene | 88.2 | 80-120 | | %Rec | 1 | 2/1/2017 1:10:06 PM | 29940 |

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

| | | |
|--------------------|---|---|
| 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 |

Hall Environmental Analysis Laboratory, Inc.

Analytical Report

Lab Order 1702003

Date Reported: 2/2/2017

CLIENT: Rule Engineering LLC

Client Sample ID: BGTN-2

Project: COP Lucerne D #1

Collection Date: 1/31/2017 12:15:00 PM

Lab ID: 1702003-002

Matrix: MEOH (SOIL)

Received Date: 2/1/2017 8:00:00 AM

| Analyses | Result | PQL | Qual | Units | DF | Date Analyzed | Batch |
|--|--------|----------|------|-------|----|----------------------|---------------------|
| EPA METHOD 418.1: TPH | | | | | | | Analyst: MAB |
| Petroleum Hydrocarbons, TR | 220 | 19 | | mg/Kg | 1 | 2/1/2017 11:00:00 AM | 29989 |
| EPA METHOD 300.0: ANIONS | | | | | | | Analyst: MRA |
| Chloride | ND | 30 | | mg/Kg | 20 | 2/1/2017 11:35:19 AM | 29997 |
| EPA METHOD 8015M/D: DIESEL RANGE ORGANICS | | | | | | | Analyst: TOM |
| Diesel Range Organics (DRO) | 100 | 10 | | mg/Kg | 1 | 2/1/2017 1:43:54 PM | 29988 |
| Motor Oil Range Organics (MRO) | 170 | 50 | | mg/Kg | 1 | 2/1/2017 1:43:54 PM | 29988 |
| Surr: DNOP | 120 | 70-130 | | %Rec | 1 | 2/1/2017 1:43:54 PM | 29988 |
| EPA METHOD 8015D: GASOLINE RANGE | | | | | | | Analyst: NSB |
| Gasoline Range Organics (GRO) | ND | 4.1 | | mg/Kg | 1 | 2/1/2017 1:33:51 PM | 29940 |
| Surr: BFB | 87.9 | 68.3-144 | | %Rec | 1 | 2/1/2017 1:33:51 PM | 29940 |
| EPA METHOD 8021B: VOLATILES | | | | | | | Analyst: NSB |
| Benzene | ND | 0.020 | | mg/Kg | 1 | 2/1/2017 1:33:51 PM | 29940 |
| Toluene | ND | 0.041 | | mg/Kg | 1 | 2/1/2017 1:33:51 PM | 29940 |
| Ethylbenzene | ND | 0.041 | | mg/Kg | 1 | 2/1/2017 1:33:51 PM | 29940 |
| Xylenes, Total | ND | 0.081 | | mg/Kg | 1 | 2/1/2017 1:33:51 PM | 29940 |
| Surr: 4-Bromofluorobenzene | 87.9 | 80-120 | | %Rec | 1 | 2/1/2017 1:33:51 PM | 29940 |

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

| | | | | |
|--------------------|----|---|----|---|
| 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#: 1702003

02-Feb-17

Client: Rule Engineering LLC

Project: COP Lucerne D #1

| | | | | | | | | | | |
|------------|----------|-------------------------|-----------|-------------|------------------------------------|----------|--------------|------|----------|------|
| Sample ID | MB-29997 | SampType: mblk | | | TestCode: EPA Method 300.0: Anions | | | | | |
| Client ID: | PBS | Batch ID: 29997 | | | RunNo: 40456 | | | | | |
| Prep Date: | 2/1/2017 | Analysis Date: 2/1/2017 | | | SeqNo: 1267780 | | Units: mg/Kg | | | |
| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
| Chloride | ND | 1.5 | | | | | | | | |

| | | | | | | | | | | |
|------------|-----------|-------------------------|-----------|-------------|------------------------------------|----------|--------------|------|----------|------|
| Sample ID | LCS-29997 | SampType: Ics | | | TestCode: EPA Method 300.0: Anions | | | | | |
| Client ID: | LCSS | Batch ID: 29997 | | | RunNo: 40456 | | | | | |
| Prep Date: | 2/1/2017 | Analysis Date: 2/1/2017 | | | SeqNo: 1267781 | | Units: mg/Kg | | | |
| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
| Chloride | 14 | 1.5 | 15.00 | 0 | 94.5 | 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#: 1702003

02-Feb-17

Client: Rule Engineering LLC

Project: COP Lucerne D #1

| | | | | | | | | | | |
|----------------------------|----------|----------------|-----------|-------------|-----------------------|----------|-----------|------|----------|------|
| Sample ID | MB-29989 | SampType: | MBLK | TestCode: | EPA Method 418.1: TPH | | | | | |
| Client ID: | PBS | Batch ID: | 29989 | RunNo: | 40419 | | | | | |
| Prep Date: | 2/1/2017 | Analysis Date: | 2/1/2017 | SeqNo: | 1266880 | 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-29989 | SampType: LCS | | | TestCode: EPA Method 418.1: TPH | | | | | |
| Client ID: | LCSS | Batch ID: 29989 | | | RunNo: 40419 | | | | | |
| Prep Date: | 2/1/2017 | Analysis Date: 2/1/2017 | | | SeqNo: 1266881 | | Units: mg/Kg | | | |
| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
| Petroleum Hydrocarbons, TR | 110 | 20 | 100.0 | 0 | 107 | 61.7 | 138 | | | |

| | | | | | | | | | | |
|----------------------------|------------|-------------------------|-----------|-------------|---------------------------------|----------|--------------|------|----------|------|
| Sample ID | LCSD-29989 | SampType: LCSD | | | TestCode: EPA Method 418.1: TPH | | | | | |
| Client ID: | LCSS02 | Batch ID: 29989 | | | RunNo: 40419 | | | | | |
| Prep Date: | 2/1/2017 | Analysis Date: 2/1/2017 | | | SeqNo: 1266882 | | Units: mg/Kg | | | |
| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
| Petroleum Hydrocarbons, TR | 110 | 20 | 100.0 | 0 | 106 | 61.7 | 138 | 1.24 | 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#: 1702003

02-Feb-17

Client: Rule Engineering LLC

Project: COP Lucerne D #1

| | | | | | | | | | | |
|------------|----------|----------------|-----------|-------------|---|----------|-----------|------|----------|------|
| Sample ID | MB-29988 | SampType: | MBLK | TestCode: | EPA Method 8015M/D: Diesel Range Organics | | | | | |
| Client ID: | PBS | Batch ID: | 29988 | RunNo: | 40413 | | | | | |
| Prep Date: | 2/1/2017 | Analysis Date: | 2/1/2017 | SeqNo: | 1266782 | 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 | | | | | | | | |
| Surr: DNOP | 11 | | 10.00 | | 107 | 70 | 130 | | | |

| | | | | | | | | | | |
|------------|-----------|----------------|-----------|-------------|---|----------|-----------|------|----------|------|
| Sample ID | LCS-29988 | SampType: | LCS | TestCode: | EPA Method 8015M/D: Diesel Range Organics | | | | | |
| Client ID: | LCSS | Batch ID: | 29988 | RunNo: | 40413 | | | | | |
| Prep Date: | 2/1/2017 | Analysis Date: | 2/1/2017 | SeqNo: | 1266804 | Units: | mg/Kg | | | |
| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |

| | | | | | | | | | | |
|-----------------------------|-----|----|-------|---|------|------|-----|--|--|--|
| Diesel Range Organics (DRO) | 48 | 10 | 50.00 | 0 | 96.8 | 63.8 | 116 | | | |
| Surr: DNOP | 5.0 | | 5.000 | | 100 | 70 | 130 | | | |

Qualifiers:

- | | |
|---|---|
| * Value exceeds Maximum Contaminant Level. | B Analyte detected in the associated Method Blank |
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| 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 |

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Client: Rule Engineering LLC

Project: COP Lucerne D #1

| | | | | | | | | | | |
|-------------------------------|-----------|----------------|-----------|-------------|----------------------------------|----------|-----------|------|----------|------|
| Sample ID | MB-29940 | SampType: | MBLK | TestCode: | EPA Method 8015D: Gasoline Range | | | | | |
| Client ID: | PBS | Batch ID: | 29940 | RunNo: | 40433 | | | | | |
| Prep Date: | 1/30/2017 | Analysis Date: | 2/1/2017 | SeqNo: | 1267563 | 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 | 860 | | 1000 | | 85.8 | 68.3 | 144 | | | |

| | | | | | | | | | | |
|-------------------------------|-----------|----------------|-----------|-------------|----------------------------------|----------|-----------|------|----------|------|
| Sample ID | LCS-29940 | SampType: | LCS | TestCode: | EPA Method 8015D: Gasoline Range | | | | | |
| Client ID: | LCSS | Batch ID: | 29940 | RunNo: | 40433 | | | | | |
| Prep Date: | 1/30/2017 | Analysis Date: | 2/1/2017 | SeqNo: | 1267564 | 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 | 104 | 74.6 | 123 | | | |
| Surr: BFB | 930 | | 1000 | | 93.1 | 68.3 | 144 | | | |

| | | | | | | | | | | |
|------------|-----------|----------------|-----------|-------------|----------------------------------|----------|-----------|------|----------|------|
| Sample ID | MB-29966 | SampType: | MBLK | TestCode: | EPA Method 8015D: Gasoline Range | | | | | |
| Client ID: | PBS | Batch ID: | 29966 | RunNo: | 40433 | | | | | |
| Prep Date: | 1/31/2017 | Analysis Date: | 2/1/2017 | SeqNo: | 1267573 | Units: | %Rec | | | |
| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
| Surr: BFB | 870 | | 1000 | | 87.1 | 68.3 | 144 | | | |

| | | | | | | | | | | |
|------------|-----------|----------------|-----------|-------------|----------------------------------|----------|-----------|------|----------|------|
| Sample ID | LCS-29966 | SampType: | LCS | TestCode: | EPA Method 8015D: Gasoline Range | | | | | |
| Client ID: | LCSS | Batch ID: | 29966 | RunNo: | 40433 | | | | | |
| Prep Date: | 1/31/2017 | Analysis Date: | 2/1/2017 | SeqNo: | 1267575 | Units: | %Rec | | | |
| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
| Surr: BFB | 970 | | 1000 | | 96.9 | 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#: 1702003

02-Feb-17

Client: Rule Engineering LLC

Project: COP Lucerne D #1

| | | | | | | | | | | |
|----------------------------|-----------|-------|----------------|-------------|------|-----------|-----------------------------|------|--------------|------|
| Sample ID | MB-29940 | | SampType: | MBLK | | TestCode: | EPA Method 8021B: Volatiles | | | |
| Client ID: | PBS | | Batch ID: | 29940 | | RunNo: | 40433 | | | |
| Prep Date: | 1/30/2017 | | Analysis Date: | 2/1/2017 | | SeqNo: | 1267607 | | Units: mg/Kg | |
| 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 | 0.86 | | 1.000 | | 86.4 | 80 | 120 | | | |

| | | | | | | | | | | |
|----------------------------|-----------|-------|----------------|-------------|------|-----------|-----------------------------|------|--------------|------|
| Sample ID | LCS-29940 | | SampType: | LCS | | TestCode: | EPA Method 8021B: Volatiles | | | |
| Client ID: | LCSS | | Batch ID: | 29940 | | RunNo: | 40433 | | | |
| Prep Date: | 1/30/2017 | | Analysis Date: | 2/1/2017 | | SeqNo: | 1267608 | | Units: mg/Kg | |
| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
| Benzene | 0.95 | 0.025 | 1.000 | 0 | 94.8 | 75.2 | 115 | | | |
| Toluene | 0.84 | 0.050 | 1.000 | 0 | 83.7 | 80.7 | 112 | | | |
| Ethylbenzene | 0.82 | 0.050 | 1.000 | 0 | 81.8 | 78.9 | 117 | | | |
| Xylenes, Total | 2.5 | 0.10 | 3.000 | 0 | 82.7 | 79.2 | 115 | | | |
| Surr: 4-Bromofluorobenzene | 0.91 | | 1.000 | | 90.6 | 80 | 120 | | | |

| | | | | | | | | | | |
|----------------------------|-----------|-----|----------------|-------------|------|-----------|-----------------------------|------|-------------|------|
| Sample ID | MB-29966 | | SampType: | MBLK | | TestCode: | EPA Method 8021B: Volatiles | | | |
| Client ID: | PBS | | Batch ID: | 29966 | | RunNo: | 40433 | | | |
| Prep Date: | 1/31/2017 | | Analysis Date: | 2/1/2017 | | SeqNo: | 1267615 | | Units: %Rec | |
| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
| Surr: 4-Bromofluorobenzene | 0.90 | | 1.000 | | 89.6 | 80 | 120 | | | |

| | | | | | | | | | | |
|----------------------------|-----------|-----|----------------|-------------|------|-----------|-----------------------------|------|-------------|------|
| Sample ID | LCS-29966 | | SampType: | LCS | | TestCode: | EPA Method 8021B: Volatiles | | | |
| Client ID: | LCSS | | Batch ID: | 29966 | | RunNo: | 40433 | | | |
| Prep Date: | 1/31/2017 | | Analysis Date: | 2/1/2017 | | SeqNo: | 1267616 | | Units: %Rec | |
| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
| Surr: 4-Bromofluorobenzene | 0.93 | | 1.000 | | 93.5 | 80 | 120 | | | |

Qualifiers:

- | | |
|---|---|
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| H Holding times for preparation or analysis exceeded | J Analyte detected below quantitation limits |
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| 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 |



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: 1702003

RcptNo: 1

Received by/date: aj 2/1/17

Logged By: Andy Jansson 2/1/2017 8:00:00 AM

Completed By: Andy Jansson 2/1/17

Reviewed By: [Signature] 2/1/17

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°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: ☐ eMail ☐ Phone ☐ Fax ☐ 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 | | | |

