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 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 April 3, 2017

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 NMOCD
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 ordinance
Operator: Hilcorp Energy Company OGRID #: 372171
Address: 382 Road 3100 Aztec, NM 87410
Facility or well name: STATE COM AM 37  API Number: 30-045-20324 OCD Permit Number:
U/L or Qtr/Qtr E Section 02 Township 30N Range 08W County: San Juan
Center of Proposed Design: Latitude 36.84172 N Longitude -107.65041 W NAD83
Surface Owner:  Federal State Private Tribal Trust or Indian Allotment
□ 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
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 45   mil   HDPE   PVC   Other LLDPE
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

Form C-144

Alternate. Please specify

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

Within 100 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No			
Temporary Pit Non-low chloride drilling fluid				
Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No			
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No			
Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application; - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No			
Within 300 feet of a wetland US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No			
Permanent Pit or Multi-Well Fluid Management Pit				
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No			
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No			
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.  - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No			
Within 500 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No			
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 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 docattached.  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 and 19.15.17.13 NMAC Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Previously Approved Design (attach copy of design) API Number: or Permit Number:	.15.17.9 NMAC			

Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC  Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the attached.  Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC	documents are
<ul> <li>Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC</li> <li>□ Climatological Factors Assessment</li> <li>□ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC</li> <li>□ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC</li> <li>□ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC</li> <li>□ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC</li> <li>□ Quality Control/Quality Assurance Construction and Installation Plan</li> </ul>	
<ul> <li>□ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC</li> <li>□ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC</li> <li>□ Nuisance or Hazardous Odors, including H₂S, Prevention Plan</li> <li>□ Emergency Response Plan</li> <li>□ Oil Field Waste Stream Characterization</li> <li>□ Monitoring and Inspection Plan</li> <li>□ Erosion Control Plan</li> <li>□ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC</li> </ul>	
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 F Alternative  Proposed Closure Method: Waste Excavation and Removal	luid Management Pit
Waste Removal (Closed-loop systems only)  On-site Closure Method (Only for temporary pits and closed-loop systems)  In-place Burial On-site Trench Burial  Alternative Closure Method	
14.	
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be closure plan. Please indicate, by a check mark in the box, that the documents are attached.  ☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC ☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC ☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings) ☐ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC ☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	
15.	
Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable sour provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. In 19.15.17.10 NMAC for guidance.	
Ground water is less than 25 feet below the bottom of the buried waste.  - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is more than 100 feet below the bottom of the buried waste.  - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application.  - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	Yes No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	

adopted pursuant to NMSA 1978, Section 3-27-3, as amended.  - Written confirmation or verification from the municipality; Written approval obtained from the municipality			
- Written committation of verification from the maintepanty, written approval obtained from the maintepanty	☐ 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 19.15.17.13 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			
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 bel	ief.		
Name (Print): Title:			
Signature: Date:			
e-mail address:  Telephone:			
e-mail address:	the closure report.		
e-mail address:    Telephone:	g the closure report. It complete this		

22.	
Operator Closure Certification:	
I hereby certify that the information and attachments submitted with this belief. I also certify that the closure complies with all applicable closure	closure report is true, accurate and complete to the best of my knowledge and requirements and conditions specified in the approved closure plan.
Name (Print): Priscilla Shorty	Title: Operations/Regulatory Technician – Sr
Signature: Stu sella Grotty.	Date:/30/19
e-mail address: <u>pshorty@hilcorp.com</u>	Telephone:(505) 324-5188

# Hilcorp Energy Company San Juan Basin Below Grade Tank Closure Report

Lease Name: State Com AM 37

API No.: 30-045-20324

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. HILCORP 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, HILCORP 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. HILCORP 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. HILCORP 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 HILCORP 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. HILCORP will test the soils beneath the below-grade tank to determine whether a release has occurred. HILCORP 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. Hilcorp 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 HILCORP or the division determines that a release has occurred, then HILCORP 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 HILCORP shall backfill the excavation with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover; recontour and revegetate 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 HILCORP'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. HILCORP 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. Hilcorp 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)

### **Priscilla Shorty**

From: Priscilla Shorty

Sent: Tuesday, January 8, 2019 1:57 PM

To: 'Fields, Vanessa, EMNRD'; 'Smith, Cory, EMNRD'

Cc: Mandi Walker; Chad Perkins; Jennifer Deal

Subject: State Com AM 37 - 72 hr BGT Notification - Closure

Attachments: STATE COM AM 37 OLD APPVD BGT.PDF; STATE COM AM 37 APPVD BGT PERMIT.PDF

**Subject: 72 Hour BGT Notification** 

Anticipated Start Date: Friday, January 11, 2019 at approximately 2:00 pm.

The subject well has a 120 bbl BGT that will closed and back filled for well recompletion activities. After the recompletion we will be resetting the production facilities and the 120 bbl BGT that will be set in the location detailed on the new BGT permit. I have attached the old and new approved permit for reference.

Well Name: State Com AM 37

API#: 3004520324

Location: Unit E (SWNW), Section 02, T30N, R08W

Footages: 1980' FNL & 790' FWL

Operator: Hilcorp Energy Company

Surface Owner: State

Reason: Recomplete

Priscilla A. Shorty

San Juan North Regulatory Technician **Hilcorp Energy Company** 505-324-5188

pshorty@hilcorp.com

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

Responsible Party

Contact Name

Contact email

Hilcorp Energy Company

pshorty@hilcorp.com

Priscilla Shorty

State of New Mexico Energy Minerals and Natural Resources Department

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Form C-141 Revised August 24, 2018 Submit to appropriate OCD District office

Incident ID	
District RP	
Facility ID	
Application ID	

# **Release Notification**

# **Responsible Party**

OGRID

372171

Incident # (assigned by OCD)

Contact Telephone (505) 324-5188

Contact maili	ing address	382 Road 3100	Aztec NM 87410	)		
Location of Release Source						
Latitude	36.84172	N	(NAD 83 in decin	Longitude _ mal degrees to 5 decim	-107.65041 val places)	W
Site Name Sta	ate Com AN	1 37		Site Type	Gas Well	
Date Release	Discovered	N/A		API# (if app	licable) 30-045-20	324
Unit Letter	Section	Township	Range	Coun	ty	
Е	2	30N	08W	San Juan		
Surface Owner	: 🛭 State	☐ Federal ☐ Tr	ibal Private (No		) . I	)
			Nature and			
Crude Oil	Materia	(s) Released (Select al Volume Release		alculations or specific	Volume Reco	volumes provided below) vered (bbls)
Produced	Water	Volume Release	d (bbls)		Volume Reco	vered (bbls)
		Is the concentrat	ion of dissolved chl >10,000 mg/l?	loride in the	☐ Yes ☐ N	0
Condensat	te	Volume Release			Volume Reco	vered (bbls)
☐ Natural G	as	Volume Released (Mcf)			Volume Recovered (Mcf)	
Other (describe) Volume/Weight Released (provide units)		Volume/Weig	ht Recovered (provide units)			
Cause of Release  No release was encountered during the BGT Closure.  Walks Caured  Though under closure						
				Lionsh	Stan	dord D

Form C-141
Page 2

# State of New Mexico Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

## Was this a major release?  ## release as defined by 19.15.29.7(A) NMAC?  ## N/A  #		
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?    Not Required     Initial Response     The responsible party must undertake the following actions tomeediately unless they could create a safety hazard that would result in injury		If YES, for what reason(s) does the responsible party consider this a major release?
Initial Response  The responsible party must undertake the following actions immediately unless they could crease a safety hazard that would result in injury  The source of the release has been stopped. The impacted area has been secured to protect human health and the environment. Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. All free liquids and recoverable materials have been removed and managed appropriately.  If all the actions described above have not been undertaken, explain why:  N/A  Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.  Thereby certify that the information given above is true and complete to the best of my knowledge and understand that pursupant to OCD 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 does not releve the operator of interesting the object of the environment. In addition, OCD acceptance of a C-141 report does not releve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.  Printed Name: Priscilla Shorty Title: Operations/Regulatory Technician—Sr.  Signature: Human Pathory Technician—Sr.  Date: 1/30/19  email: pshorty@hilcorp.com Telephone: (505) 324-5188	☐ Yes ⊠ No	N/A
Initial Response  The responsible party must undertake the following actions immediately unless they could crease a safety hazard that would result in injury  The source of the release has been stopped. The impacted area has been secured to protect human health and the environment. Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. All free liquids and recoverable materials have been removed and managed appropriately.  If all the actions described above have not been undertaken, explain why:  N/A  Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.  Thereby certify that the information given above is true and complete to the best of my knowledge and understand that pursupant to OCD 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 does not releve the operator of interesting the object of the environment. In addition, OCD acceptance of a C-141 report does not releve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.  Printed Name: Priscilla Shorty Title: Operations/Regulatory Technician—Sr.  Signature: Human Pathory Technician—Sr.  Date: 1/30/19  email: pshorty@hilcorp.com Telephone: (505) 324-5188		
Initial Response  The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury  The source of the release has been stopped. The impacted area has been secured to protect human health and the environment. Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. All free liquids and recoverable materials have been removed and managed appropriately.  If all the actions described above have not been undertaken, explain why:  NA  Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.  I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursupant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundware, surface water, human health or the environment. In addition, OCD 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.  Printed Name: Priscilla Shorty Title: Operations/Regulatory/Technician—Sr.  Signature: Priscilla Shorty Title: Operations/Regulatory/Technician—Sr.  Signature: Printed Name: Priscilla Shorty Title: Operations/Regulatory/Technician—Sr.	If YES, was immediate no	otice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?
The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury  The source of the release has been stopped. The impacted area has been secured to protect human health and the environment. Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. All free liquids and recoverable materials have been removed and managed appropriately.  If all the actions described above have not been undertaken, explain why:  N/A  Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.  Thereby certify that the information given above is true and complete to the best of my knowledge and understand that pursupant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, hould be incorrective actions for releases which may endanger public health or the environment. The 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.  Printed Name:  Priscilla Shorty  Title:  Operations/Regulatory Technician – Sr.  Signature:  Priscilla Shorty  Title:  Operations/Regulatory Technician – Sr.  Date: 1/30/19  email:  pshorty@hilcorp.com  Telephone:  (505) 324-5188	Not Required	
The source of the release has been stopped.  The impacted area has been secured to protect human health and the environment.  Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.  All free liquids and recoverable materials have been removed and managed appropriately.  If all the actions described above have not been undertaken, explain why:  N/A  Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.  I hereby certify that the information given shove is true and complete to the best of my knowledge and understand that pursupant to OCD 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 OCD does not relieve the operator of liability should their operations have addition, OCD 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.  Printed Name: Priscilla Shorty Title: Operations/Regulatory Technician – Sr.  Signature: Date: 1/30/19  email:		Initial Response
The impacted area has been secured to protect human health and the environment.  Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.  All free liquids and recoverable materials have been removed and managed appropriately.  If all the actions described above have not been undertaken, explain why:  N/A  Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.  Thereby certify that the information given above is true and complete to the best of my knowledge and understand that pursupant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.  Printed Name: Priscilla Shorty Title: Operations/Regulatory Technician – Sr.  Signature: Date: 1/30/19  email: pshorty@hilcorp.com Telephone: (505) 324-5188	The responsible p	party must undertake the following actions immediately unless they could create a safety hazard that would result in injury
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.  All free liquids and recoverable materials have been removed and managed appropriately.  If all the actions described above have not been undertaken, explain why:  N/A  Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.  Ihereby certify that the information given above is true and complete to the best of my knowledge and understand that pursupant to OCD 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 OCD does not relieve the operator of relability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.  Printed Name: Priscilla Shorty Title: Operations/Regulatory Technician – Sr.  Signature: Priscilla Shorty Title: Operations/Regulatory Technician – Sr.  Date: 1/30/19  email:	☐ The source of the rele	ease has been stopped.
All free liquids and recoverable materials have been removed and managed appropriately.  If all the actions described above have not been undertaken, explain why:  N/A  Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.  Ihereby certify that the information given above is true and complete to the best of my knowledge and understand that pursupant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.  Printed Name: Priscilla Shorty Title: Operations/Regulatory Technician – Sr.  Signature: Priscilla Shorty Telephone: (505) 324-5188  OCD Only	☐ The impacted area ha	s been secured to protect human health and the environment.
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.  I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursupant to OCD 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 for the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.  Printed Name:  Priscilla Shorty  Title:  Operations/Regulatory Technician – Sr.  Signature:  Priscilla Shorty  Title:  Operations/Regulatory Technician – Sr.  Date: 1/30/19  email:	Released materials ha	we been contained via the use of berms or dikes, absorbent pads, or other containment devices.
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.  I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursupant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.  Printed Name: Priscilla Shorty Title: Operations/Regulatory Technician – Sr.  Signature: Date: 1/30/19  email: pshorty@hilcorp.com Telephone: (505) 324-5188	All free liquids and re	ecoverable materials have been removed and managed appropriately.
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.  I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursupant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.  Printed Name: Priscilla Shorty Title: Operations/Regulatory Technician – Sr.  Signature: Date: 1/30/19  email: pshorty@hilcorp.com Telephone: (505) 324-5188	If all the actions described	d above have not been undertaken, explain why:
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.  I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursupant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.  Printed Name: Priscilla Shorty Title: Operations/Regulatory Technician – Sr.  Signature: Date: 1/30/19  email: pshorty@hilcorp.com Telephone: (505) 324-5188	N7/4	
has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.  I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursupant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.  Priscilla Shorty  Title:  Operations/Regulatory Technician – Sr.  Date: 1/30/19  email:  pshorty@hilcorp.com  Telephone:  (505) 324-5188	N/A	
has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.  I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursupant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.  Priscilla Shorty  Title:  Operations/Regulatory Technician – Sr.  Date: 1/30/19  email:  pshorty@hilcorp.com  Telephone:  (505) 324-5188		
has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.  I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursupant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.  Priscilla Shorty  Title:  Operations/Regulatory Technician – Sr.  Date: 1/30/19  email:  pshorty@hilcorp.com  Telephone:  (505) 324-5188		
has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.  I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursupant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.  Priscilla Shorty  Title:  Operations/Regulatory Technician – Sr.  Date: 1/30/19  email:		
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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.  Printed Name: Priscilla Shorty Title: Operations/Regulatory Technician – Sr.  Signature: Date: 1/30/19  email: pshorty@hilcorp.com Telephone: (505) 324-5188	has begun, please attach	a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred
Signature: Stusula Shorty  email: pshorty@hilcorp.com  Telephone: (505) 324-5188  OCD Only	regulations all operators are public health or the environr failed to adequately investigaddition, OCD acceptance of	required to report and/or file certain release notifications and perform corrective actions for releases which may endanger ment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have atteand remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In
email:	Printed Name:	Priscilla Shorty Title: Operations/Regulatory Technician – Sr.
OCD Only	Signature: 181	Ula Shorty Date: 1/30/19
	email:pshorty	@hilcorp.com Telephone: (505) 324-5188
Received by: Date:	OCD Only	
	Received by:	Date:



# ANALYTICAL REPORT

January 22, 2019

# HilCorp-Farmington, NM

Sample Delivery Group:

L1060883

Samples Received:

01/15/2019

Project Number:

State Com AM #37

Description:

State Com AM #37

Site:

STATE COM AM#37

Report To:

Jennifer Deal

382 Road 3100

Aztec, NM 87401

Entire Report Reviewed By: Washne R Richardf

Daphne Richards Project Manager

Results relate only to the items tested or calibrated and are reported as rounded values. This test report shall not be reproduced, except in full, without written approval of the laboratory. Where applicable, sampling conducted by Pace National is performed per guidance provided in laboratory standard operating procedures: 060302, 060303, and 060304.



# TABLE OF CONTENTS

ONE LAB. NATIONWIDE.

Cp: Cover Page	1
Tc: Table of Contents	2
Ss: Sample Summary	3
Cn: Case Narrative	4
Sr: Sample Results	5
BGT BASE L1060883-01	5
Qc: Quality Control Summary	6
Wet Chemistry by Method 9056A	6
Volatile Organic Compounds (GC) by Method 8015/8021	7
Semi-Volatile Organic Compounds (GC) by Method 8015	9
GI: Glossary of Terms	10
Al: Accreditations & Locations	11
Sc. Sample Chain of Custody	12



















# SAMPLE SUMMARY

ONE LAB. NATIONWIDE.



			Collected by	Collected date/time	Received date/time
BGT BASE L1060883-01 Solid			Chad Perkins	01/11/19 14:20	01/15/19 08:45
Method	Batch	Dilution	Preparation	Analysis	Analyst
			date/time	date/time	
Wet Chemistry by Method 9056A	WG1224032	1	01/19/19 10:00	01/19/19 18:51	ST
Volatile Organic Compounds (GC) by Method 8015/8021	WG1224522	1	01/16/19 08:58	01/16/19 23:46	DWR
Semi-Volatile Organic Compounds (GC) by Method 8015	WG1225676	1	01/18/19 14:01	01/18/19 17:54	KLM













Ср

<sup>2</sup>Tc



Sr

<sup>®</sup>Qc







All sample aliquots were received at the correct temperature, in the proper containers, with the appropriate preservatives, and within method specified holding times, unless qualified or notated within the report. Where applicable, all MDL (LOD) and RDL (LOQ) values reported for environmental samples have been corrected for the dilution factor used in the analysis. All Method and Batch Quality Control are within established criteria except where addressed in this case narrative, a non-conformance form or properly qualified within the sample results. By my digital signature below, I affirm to the best of my knowledge, all problems/anomalies observed by the laboratory as having the potential to affect the quality of the data have been identified by the laboratory, and no information or data have been knowingly withheld that would affect the quality of the data.

Daphne Richards Project Manager

apline R Richards

### **BGT BASE**

# SAMPLE RESULTS - 01

ONE LAB. NATIONWIDE.

Collected date/time: 01/11/19 14:20

# Wet Chemistry by Method 9056A

	Result	Qualifier	RDL	Dilution	Analysis	Batch
Analyte	mg/kg		mg/kg		date / time	
Chloride	ND		10.0	1	01/19/2019 18:51	WG1224032



	Result	Qualifier	RDL	Dilution	Analysis	Batch
Analyte	mg/kg		mg/kg		date / time	
Benzene	ND		0.000500	1	01/16/2019 23:46	WG1224522
Toluene	ND		0.00500	1	01/16/2019 23:46	WG1224522
Ethylbenzene	ND		0.000500	1	01/16/2019 23:46	WG1224522
Total Xylene	ND	<u>J6</u>	0.00150	1	01/16/2019 23:46	WG1224522
TPH (GC/FID) Low Fraction	ND		0.100	1	01/16/2019 23:46	WG1224522
(S) a,a,a-Trifluorotoluene(FID)	93.2		77.0-120		01/16/2019 23:46	WG1224522
(S) a,a,a-Trifluorotoluene(PID)	102		72.0-128		01/16/2019 23:46	WG1224522



# Semi-Volatile Organic Compounds (GC) by Method 8015

	Result	Qualifier	RDL	Dilution	Analysis	Batch
Analyte	mg/kg		mg/kg		date / time	
C10-C28 Diesel Range	6.73	J3 J6	4.00	1	01/18/2019 17:54	WG1225676
C28-C40 Oil Range	6.31		4.00	1	01/18/2019 17:54	WG1225676
(S) o-Terphenyl	68.8		18.0-148		01/18/2019 17:54	WG1225676



### WG1224032

### QUALITY CONTROL SUMMARY

### ONE LAB. NATIONWIDE.

Wet Chemistry by Method 9056A

### L1060883-01

DUP RPD

Limits

15

**DUP** Qualifier

### Method Blank (MB)

Analyte

Chloride

(MB) R3377528-1	01/19/19 11:43			
	MB Result	MB Qualifier	MB MDL	MB RDL
Analyte	mg/kg		mg/kg	mg/kg
Chloride	0.898	J	0.795	10.0

Original Result DUP Result

mg/kg

35.3

L1061067-03 Original Sample (OS) • Duplicate (DUP) (OS) L1061067-03 01/19/19 13:39 • (DUP) R3377528-3 01/19/19 14:04

mg/kg

38.5















L1061025-03 Original Sample (OS) • Duplicate (DUP)

	Original Result (dry)	DUP Result (dry)	Dilution	DUP RPD	DUP Qualifier	DUP RPD Limits
Analyte	mg/kg	mg/kg		%		%
Chloride	33.4	33.0	1	1.29		15

Dilution DUP RPD

%

8.70

# Laboratory Control Sample (LCS)

(LCS) R3377528-2	01/19/19 12:08				
	Spike Amount	LCS Result	LCS Rec.	Rec. Limits	LCS Qualifier
Analyte	mg/kg	mg/kg	%	%	
Chloride	200	213	107	80.0-120	

# L1060426-01 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L1060426-01	01/19/19 15:24	• (MS) R3377528-4	01/19/19 15:50	<ul> <li>(MSD) R3377528-5</li> </ul>	01/19/19 16:16
1 /		1			

	Spike Amount (dry)	Original Result (dry)	MS Result (dry)	MSD Result (dry)	MS Rec.	MSD Rec.	Dilution	Rec. Limits	MS Qualifier	MSD Qualifier	RPD	RPD Limits
Analyte	mg/kg	mg/kg	mg/kg	mg/kg	%	%		%			%	%
Chloride	1190	254	1480	1500	103	104	1	80.0-120			1.10	15

### QUALITY CONTROL SUMMARY

ONE LAB. NATIONWIDE.

Volatile Organic Compounds (GC) by Method 8015/8021

L1060883-01

### Method Blank (MB)

(MB) R3377178-5 01/16/19	9 16:41				
	MB Result	MB Qualifier	MB MDL	MB RDL	2
Analyte	mg/kg		mg/kg	mg/kg	
Benzene	0.000172	J	0.000120	0.000500	
Toluene	0.000243	<u>J</u>	0.000150	0.00500	3
Ethylbenzene	0.000127	<u>J</u>	0.000110	0.000500	L
Total Xylene	U		0.000460	0.00150	4
TPH (GC/FID) Low Fraction	U		0.0217	0.100	
(S) a,a,a-Trifluorotoluene(FID)	94.7			77.0-120	5
(S) a,a,a-Trifluorotoluene(PID)	103			72.0-128	

# Laboratory Control Sample (LCS) • Laboratory Control Sample Duplicate (LCSD)

(LCS) R3377178-1 01/16/19	9 14:41 • (LCSD) F	R3377178-2 01	1/16/19 15:05							
	Spike Amount	LCS Result	LCSD Result	LCS Rec.	LCSD Rec.	Rec. Limits	LCS Qualifier	LCSD Qualifier	RPD	RPD Limits
Analyte	mg/kg	mg/kg	mg/kg	%	%	%			%	%
Benzene	0.0500	0.0447	0.0452	89.4	90.5	76.0-121			1.18	20
Toluene	0.0500	0.0444	0.0448	88.7	89.6	80.0-120			0.960	20
Ethylbenzene	0.0500	0.0476	0.0482	95.2	96.3	80.0-124			1.21	20
Total Xylene	0.150	0.140	0.141	93.0	94.1	37.0-160			1.14	20
(S) a,a,a-Trifluorotoluene(FID)				94.3	94.5	77.0-120				
(S) a,a,a-Trifluorotoluene(PID)				103	103	72.0-128				

# Laboratory Control Sample (LCS) • Laboratory Control Sample Duplicate (LCSD)

(LCS) R3377178-3 01/16/19	9 15:29 • (LCSD)	R3377178-4	01/16/19 15:53								
	Spike Amount	LCS Result	LCSD Result	LCS Rec.	LCSD Rec.	Rec. Limits	LCS Qualifier	LCSD Qualifier	RPD	RPD Limits	
Analyte	mg/kg	mg/kg	mg/kg	%	%	%			%	%	
TPH (GC/FID) Low Fraction	5.50	5.45	5.63	99.0	102	72.0-127			3.22	20	
(S) a,a,a-Trifluorotoluene(FID)				108	108	77.0-120					
(S) a,a,a-Trifluorotoluene(PID)				114	114	72.0-128					

### QUALITY CONTROL SUMMARY

ONE LAB. NATIONWIDE.

Volatile Organic Compounds (GC) by Method 8015/8021

L1060883-01

### L1060883-01 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L1060883-01 01/16/	19 23:46 • (MS) F	3377178-6 01/	17/19 00:10 •	(MSD) R3377178	3-7 01/17/19 0	0:35						
	Spike Amount	Original Result	MS Result	MSD Result	MS Rec.	MSD Rec.	Dilution	Rec. Limits	MS Qualifier	MSD Qualifier	RPD	RPD Limits
Analyte	mg/kg	mg/kg	mg/kg	mg/kg	%	%		%			%	%
Benzene	0.0500	ND	0.0140	0.0154	27.5	30.3	1	10.0-155			9.38	32
Toluene	0.0500	ND	0.0160	0.0179	31.6	35.4	1	10.0-160			11.0	34
Ethylbenzene	0.0500	ND	0.0219	0.0246	42.9	48.3	1	10.0-160			11.6	32
Total Xylene	0.150	ND	0.0651	0.0736	43.4	49.1	1	10.0-160	<u>J6</u>	<u>J6</u>	12.3	32
(S) a,a,a-Trifluorotoluene(FID)					94.4	93.9		77.0-120				
(S) a.a.a-Trifluorotoluene(PID)					102	102		72.0-128				

# L1060883-01 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L1060883-01 01/16/1	19 23:46 • (MS) F	23377178-8 01/	17/19 00:59 • (	(MSD) R3377178	B-9 01/17/19 0	1:23						
	Spike Amount	Original Result	MS Result	MSD Result	MS Rec.	MSD Rec.	Dilution	Rec. Limits	MS Qualifier	MSD Qualifier	RPD	RPD Limits
Analyte	mg/kg	mg/kg	mg/kg	mg/kg	%	%		%			%	%
TPH (GC/FID) Low Fraction	5.50	ND	1.57	1.67	28.5	30.4	1	10.0-151			6.58	28
(S) a,a,a-Trifluorotoluene(FID)					94.6	94.2		77.0-120				
(S) a,a,a-Trifluorotoluene(PID)					103	102		72.0-128				



### WG1225676

### QUALITY CONTROL SUMMARY

ONE LAB. NATIONWIDE.

Semi-Volatile Organic Compounds (GC) by Method 8015

Laboratory Control Sample (LCS) • Laboratory Control Sample Duplicate (LCSD)

LCSD Result LCS Rec.

L1060883-01

### Method Blank (MB)

(MB) R3377048-1 01/18/	19 16:38			
	MB Result	MB Qualifier	MB MDL	MB RDL
Analyte	mg/kg		mg/kg	mg/kg
C10-C28 Diesel Range	U		1.61	4.00
C28-C40 Oil Range	U		0.274	4.00
(S) o-Terphenyl	75.2			18.0-148

Spike Amount LCS Result

(LCS) R3377048-2 01/18/19 16:53 • (LCSD) R3377048-3 01/18/19 17:07



Analyte	mg/kg	mg/kg	mg/kg	%	%	%	%	%
C10-C28 Diesel Range	50.0	39.1	39.6	78.2	79.2	50.0-150	1.27	20
(S) o-Terphenyl				89.5	86.8	18.0-148		
L1060883-01 Ori	ginal Samp	ole (OS) • M	latrix Spike	(MS) · Ma	trix Spike [	Duplicate (MSD)		

Rec. Limits

LCS Qualifier

LCSD Qualifier RPD

**RPD Limits** 

LCSD Rec.

(OS) I 1060883-01 01/18/19 17:54 • (MS) R3377048-4 01/18/19 18:10 • (MSD) R3377048-5 01/18/19 18:25

(03) [1000003-01 01/10/13	17.54 · (NS) K.	33//046-4 01/	10/13 10.10 • (1	VISD) KSS//040	5-5 01/10/15 10	5.25							
	Spike Amount	Original Result	MS Result	MSD Result	MS Rec.	MSD Rec.	Dilution	Rec. Limits	MS Qualifier	MSD Qualifier	RPD	RPD Limits	
Analyte	mg/kg	mg/kg	mg/kg	mg/kg	%	%		%			%	%	
C10-C28 Diesel Range	48.6	6.73	33.2	25.4	54.5	38.1	1	50.0-150		J3 J6	26.6	20	
(S) o-Terphenyl					66.5	55.0		18.0-148					



### Guide to Reading and Understanding Your Laboratory Report

The information below is designed to better explain the various terms used in your report of analytical results from the Laboratory. This is not intended as a comprehensive explanation, and if you have additional questions please contact your project representative.

GLOSSARY OF TERMS

### Abbreviations and Definitions

(dry)	Results are reported based on the dry weight of the sample. [this will only be present on a dry report basis for soils].
MDL	Method Detection Limit.
ND	Not detected at the Reporting Limit (or MDL where applicable).
RDL	Reported Detection Limit.
Rec.	Recovery.
RPD	Relative Percent Difference.
SDG	Sample Delivery Group.
(S)	Surrogate (Surrogate Standard) - Analytes added to every blank, sample, Laboratory Control Sample/Duplicate and Matrix Spike/Duplicate; used to evaluate analytical efficiency by measuring recovery. Surrogates are not expected to be detected in all environmental media.
U	Not detected at the Reporting Limit (or MDL where applicable).
Analyte	The name of the particular compound or analysis performed. Some Analyses and Methods will have multiple analytes reported.
Dilution	If the sample matrix contains an interfering material, the sample preparation volume or weight values differ from the standard, or if concentrations of analytes in the sample are higher than the highest limit of concentration that the laboratory can accurately report, the sample may be diluted for analysis. If a value different than 1 is used in this field, the result reported has already been corrected for this factor.
Limits	These are the target % recovery ranges or % difference value that the laboratory has historically determined as normal for the method and analyte being reported. Successful QC Sample analysis will target all analytes recovered or duplicated within these ranges.
Original Sample	The non-spiked sample in the prep batch used to determine the Relative Percent Difference (RPD) from a quality control sample. The Original Sample may not be included within the reported SDG.
Qualifier	This column provides a letter and/or number designation that corresponds to additional information concerning the result reported. If a Qualifier is present, a definition per Qualifier is provided within the Glossary and Definitions page and potentially a discussion of possible implications of the Qualifier in the Case Narrative if applicable.
Result	The actual analytical final result (corrected for any sample specific characteristics) reported for your sample. If there was no measurable result returned for a specific analyte, the result in this column may state "ND" (Not Detected) or "BDL" (Below Detectable Levels). The information in the results column should always be accompanied by either an MDL (Method Detection Limit) or RDL (Reporting Detection Limit) that defines the lowest value that the laboratory could detect or report for this analyte.
Uncertainty (Radiochemistry)	Confidence level of 2 sigma.
Case Narrative (Cn)	A brief discussion about the included sample results, including a discussion of any non-conformances to protocol observed either at sample receipt by the laboratory from the field or during the analytical process. If present, there will be a section in the Case Narrative to discuss the meaning of any data qualifiers used in the report.
Quality Control Summary (Qc)	This section of the report includes the results of the laboratory quality control analyses required by procedure or analytical methods to assist in evaluating the validity of the results reported for your samples. These analyses are not being performed on your samples typically, but on laboratory generated material.
Sample Chain of Custody (Sc)	This is the document created in the field when your samples were initially collected. This is used to verify the time and date of collection, the person collecting the samples, and the analyses that the laboratory is requested to perform. This chain of custody also documents all persons (excluding commercial shippers) that have had control or possession of the samples from the time of collection until delivery to the laboratory for analysis.
Sample Results (Sr)	This section of your report will provide the results of all testing performed on your samples. These results are provided by sample ID and are separated by the analyses performed on each sample. The header line of each analysis section for each sample will provide the name and method number for the analysis reported.

Sample S	Summary	(Ss)
----------	---------	------

Qualifier

### Description

times of preparation and/or analysis.

Qualifier	Description	
J	The identification of the analyte is acceptable; the reported value is an estimate.	
J3	The associated batch QC was outside the established quality control range for precision.	
J6	The sample matrix interfered with the ability to make any accurate determination; spike value is low.	



This section of the Analytical Report defines the specific analyses performed for each sample ID, including the dates and



Pace National is the only environmental laboratory accredited/certified to support your work nationwide from one location. One phone call, one point of contact, one laboratory. No other lab is as accessible or prepared to handle your needs throughout the country. Our capacity and capability from our single location laboratory is comparable to the collective totals of the network laboratories in our industry. The most significant benefit to our one location design is the design of our laboratory campus. The model is conducive to accelerated productivity, decreasing turn-around time, and preventing cross contamination, thus protecting sample integrity. Our focus on premium quality and prompt service allows us to be YOUR LAB OF CHOICE.

\* Not all certifications held by the laboratory are applicable to the results reported in the attached report.

\* Accreditation is only applicable to the test methods specified on each scope of accreditation held by Pace National.

### State Accreditations

Alabama	40660	Nebraska	NE-OS-15-05
Alaska	17-026	Nevada	TN-03-2002-34
Arizona	AZ0612	New Hampshire	2975
Arkansas	88-0469	New Jersey-NELAP	TN002
California	2932	New Mexico 1	n/a
Colorado	TN00003	New York	11742
Connecticut	PH-0197	North Carolina	Env375
Florida	E87487	North Carolina <sup>1</sup>	DW21704
Georgia	NELAP	North Carolina <sup>3</sup>	41
Georgia 1	923	North Dakota	R-140
Idaho	TN00003	Ohio-VAP	CL0069
Illinois	200008	Oklahoma	9915
Indiana	C-TN-01	Oregon	TN200002
Iowa	364	Pennsylvania	68-02979
Kansas	E-10277	Rhode Island	LAO00356
Kentucky 1 6	90010	South Carolina	84004
Kentucky <sup>2</sup>	16	South Dakota	n/a
Louisiana	Al30792	Tennessee 1 4	2006
Louisiana 1	LA180010	Texas	T 104704245-17-14
Maine	TN0002	Texas <sup>5</sup>	LAB0152
Maryland	324	Utah	TN00003
Massachusetts	M-TN003	Vermont	VT2006
Michigan	9958	Virginia	460132
Minnesota	047-999-395	Washington	C847
Mississippi	TN00003	West Virginia	233
Missouri	340	Wisconsin	9980939910
Montana	CERT0086	Wyoming	A2LA

### Third Party Federal Accreditations

A2LA – ISO 17025	1461.01	AIHA-LAP,LLC EMLAP	100789
A2LA – ISO 17025 <sup>5</sup>	1461.02	DOD	1461.01
Canada	1461.01	USDA	P330-15-00234
EPA-Crypto	TN00003		

<sup>&</sup>lt;sup>1</sup> Drinking Water <sup>2</sup> Underground Storage Tanks <sup>3</sup> Aquatic Toxicity <sup>4</sup> Chemical/Microbiological <sup>5</sup> Mold <sup>6</sup> Wastewater n/a Accreditation not applicable

### Our Locations

Pace National has sixty-four client support centers that provide sample pickup and/or the delivery of sampling supplies. If you would like assistance from one of our support offices, please contact our main office. Pace National performs all testing at our central laboratory.









Pace Analytical Chain-of-Custody is a LEGAL DOCUMENT - Complete all relevent fields								LAB USE ONLY- Affix Workorder/Login Label Here or List Pace Workorder Number or MTJL Log-In									
Company: HilCorp-Farmington,	Chain-		Billing Info	Control of the last of the last	A - Compie	te an releve	int heads					All	SHAT	DED A	REAS	are for	LAB USE ONLY
Address: 382 Road 3100								7							NLA		
Aztec, NM 87401		4	PO Box 61					,		-	Contair	iner Preserv	vative ry	/pe		1,000	oject Manager:
No. of Tax			Houston,										Her ter :	-14	The des		Daphne Richards
REPORT TO: JENNIFER	DEAL																4) sodium hydroxide, (5) zinc acetate, corbic acid, (8) ammonium sulfate,
COPY TO: KURT HOEK		,	Site Coller	ection Info/A	Address:			,				de, (D) TSP, (					
Customer Project Name/Number:	STRAT		State:	County/Ci	litv: T	Time Zone Co	ollected:					Analy	ses				offle/Line: Tample Receipt Checklist:
"marketings a company to the company of the company		,	/			PT MT			0	4 7							
Phone: 505-486-9543	Site/Facility ID	O #:		4	Complian	nce Manitori	ing?		MED	k J							kly Seals Present/Intact Y M XA dy Signatures Present Y M XM
Email:	STATE	= C.01	n AIV	1 37	Yes	[ ] No		1 - /	3	1 1				A		Collec	ector Signature Present of N NA
Collected by (print):	Purchase Orde	A STATE OF THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NAMED IN COLUMN	-		DW PWS				0	t J							es Intact N HA
CHAD	Quote #:				DW Locati	ion Code:			GEO	1 1		-				Suffic	cient Volume X N NA
Collected by (signature):	Turnaround Da	Jate Requir	ed:			tely Packed	on tce:	-	+	+						VOA -	es Received on Ice 7 N 10
CHAD PERKINS					/	[ ] No			22	1 1			V				Regulated Soils YN XX
Sample Disposal:	Rush:	no.	· I Have F			ered (if appli	cable):		8015-DR0	1-1	1					Residu	iual Chlorine Present Y N XA
Dispose as appropriate     Return   Archive	[ ] Sa [ ] 2 Day [	Same Day [			[ ] Yes				1	208	10					C1 Str Sample	e ph Acceptable Y N y
Hold	1 1	(Expedite Cha	narges Apply	AL	Analysis:			_	12	1 8	A		N W			pH Str	
* Matrix Codes (Insert in Matrix bo	ox below): Drin	iking Water	r (DW), Gro	ound Water	(GW), Was	stewater (W	/W},		000	1	5		V				Acetate Strips:
Product (P), Soil/Solid (SL), Oil (C					4 44				T	+ 10	1 9						JSE ONLY:
Co		Comp /		cted (or	Comp	asite End	Res		THE	BIEX	F						Sample # / Comments
Customer Sample ID	Matrix *	Grab	Compos	site Start)			Cl	Etns	1	10	0						1046883
Salar and the sa			Date	Time	Date	Time			1								
BOT BASE	Soil	Como	11-11	2:20				1	X	X	X						-01
		1															
								July St.									
								1						AS			
		+		-	+	1		+									
		+		-	+	+	-	1						-			
	-	+		-	-	+	+-	+		1 3							
	-			-	+	+	-			-			1				
	-		-	-			-										
					1		A CONTRACTOR	A		-							
Customer Remarks / Special Cond	itions / Possible	e Hazards:	Type of Ic	e Used:	Wet	Blue I	Dry	None		200000000	The second second	S PRESENT (	-				LAB Sample Temperature Info:
#Error			Packing N	Material Use	ed:		<b>AUGUST</b>		the same of the same of	-	Name and Address of the Owner,	#: 46Z*	4 31	002	17	36	Temp Blank Received: Y N NA
#Error  Relinquished by/Company; (Signature)  CHAN PERKINS			Radchem	sample(s)	screened (<	<500 cpm):	Y 1	NA			EEDEX)		Client	Couri	rier	Pace Courier	Therm ID#: USA2 Cooler 1 Temp Upon Receipt 1.2 oC Cooler 1 Therm Corr. Factor 23 oc
		Date	te/Time: 2		Received	by/Compan	y: (Signa	iture)		0	Date/Time	21		H034			Cooler 1 Therm Corr, Factor 3 oc Cooler 1 Corrected Temp 09 oc
Relinquished by/Company: (Signal		Dat	te/Time:		Received	by/Compan	ıy: (Sign:	ature)		r	Date/Time	e:	1	Acctnum:	HILCO	RANM	Comments:
														Template			Trip Blank Received: Y N NA
Relinquished by/Company: (Signature) Da		Date	te/Time:		Received	by/Compan	- growing	ature)		Date/Time: 1/15/19 08/10			Pr	Prelogin:	d.	ne Richards	HCL MeOH TSP Other NonConformance(s) Page YES NØ Of

State Com AM 37 30-045-20324 Backfill Photos



