

RECEIVED

By JKeyes at 7:53 am, Jan 27, 2016

APPROVED

By JKeyes at 7:54 am, Jan 27, 2016

CONOCOPHILLIPS

P.O. Box 2197 Houston, TX 77252-2197 Phone 281.293.1000

VGEU Well 034

(1RP-3438)

Termination Request

API No. 30-025-02881

Release Date: July 6th, 2014

Unit Letter G, Section 26, Township 17S, Range 35E



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

January 27th, 2016

Jamie Keyes

Environmental Specialist – New Mexico Oil Conservation Division Energy, Minerals and Natural Resources Department 1625 N. French Dr. Hobbs, NM 88240

> RE: Termination Request ConocoPhillips VGEU Well 034 (1RP-3438) UL/G sec. 26 T17S R35E API No. 30-025-02881

Mr. Keyes:

ConocoPhillips (CoP) has retained Basin Environmental Service Technologies (Basin) to address potential environmental concerns at the above-referenced site.

Background and Previous Work

The site is located approximately 4.6 miles east of Buckeye, New Mexico at UL/G sec. 26 T17S R35E. USGS well records indicate that groundwater will likely be encountered at a depth of approximately 52 +/- feet.

On July 6th, 2014, CoP discovered that the well's stuffing box was leaking. The well was shut in, and the packing for the stuffing box was replaced. A total of 11.75 barrels of primarily produced water was released over 2,040 square feet of lease pad. Ten barrels of the released fluid was recovered. NMOCD was notified of the release on July 8th, 2014, and an initial C-141 was sent to NMOCD for their approval (Appendix A), and approved December 8th, 2014.

Basin personnel were on site beginning on November 18th, 2014. The release was GPS mapped, and two points within the release area were sampled at the surface. Samples with depth were not taken given how indurate the soil is at the site. The samples were field tested for chlorides and organic vapors and then taken to a commercial laboratory for analysis. Both surface samples returned elevated laboratory chloride readings and Gasoline Range Organics (GRO) and Diesel Range Organics (DRO) readings of non-detect, except for the DRO reading at Point 2, which returned a value of 70.2 mg/kg.

Based on the laboratory analysis of the release, a Corrective Action Plan (CAP) was submitted to NMOCD January 5th, 2015. NMOCD approved the CAP January 7th, 2015. The CAP stated that

the release would be scraped down 6 inches. Once the scrape was completed, a composite sample from the bottom of the scrape would be taken and field tested for chlorides and organic vapors. If the field data indicated that the composite would not achieve chloride, GRO and DRO readings below regulatory standards, the scrape would be deepened until field testing indicated that all constituents from the bottom composite would return values below regulatory standards. The bottom composite would then be taken to a commercial laboratory to confirm that chloride, GRO and DRO readings were below regulatory standards.

All excavated soils would be taken to a NMOCD approved facility for disposal. Clean caliche would be imported to the site to serve as backfill. A sample of the imported caliche would be taken to a commercial laboratory to confirm that the chloride value is below regulatory standards. The scrape would be backfilled with the imported caliche and contoured to the surrounding location.

CAP activities began June 23rd, 2015. The release area was excavated to 2.5 ft and a 5 point bottom composite sample was collected from the base of the excavation and sent to a commercial laboratory for analysis (Figure 1). Laboratory analysis returned a chloride value of 240 mg/kg and GRO and DRO values of non-detect (Appendix B). A total of 140 yards of contaminated soil were exported and disposed of at a NMOCD approved facility. A total of 230 yards of caliche imported for backfill. A total of two samples of the imported soil were taken and sent to a commercial laboratory for analysis. Laboratory analysis of Point 1 returned a chloride level of 208 mg/kg with GRO and DRO values of non-detect. Laboratory analysis of Point 2 returned chloride, GRO and DRO values of non-detect. The site was backfilled with the clean, imported caliche and contoured to the surrounding location.

Photo documentation of the backfilled site can be found in Appendix C.

Given that CoP has completed the work stated in the NMOCD approved CAP, CoP respectfully requests 'remediation termination' and site closure. A final C-141 can be found in Appendix D.

Basin appreciates the opportunity to work with you on this project. Please contact me if you have any questions or wish to discuss the site.

Sincerely,

Kyle Norman Project Lead

hyle Norma

Basin Environmental Service Technologies

(575) 942-8542

Attachments:

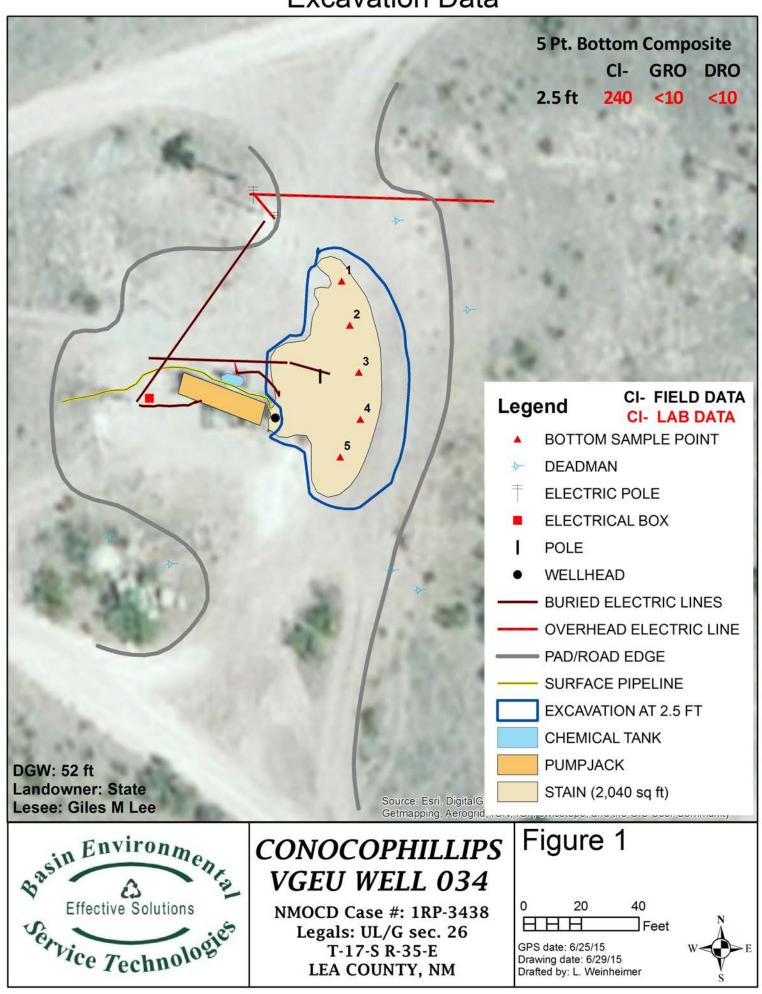
Figure 1 – Excavation Map

Appendix A – Initial C-141
Appendix B – Laboratory Analysis
Appendix C – Photo Documentation

Appendix D – Final C-141

Figures

Excavation Data



Appendix A Intial C-141

HOBBS OCD

District II.
10.08 N. French Dr., Hobbs. NM:882:00
<u>District III.</u>
811 I.S. First St., Artesia, NM 882:10
<u>District III.</u>
1000 Rio Brazos Road, Aztec, NM 874:10
<u>District IV.</u>
1720 S. St. Francis Dr., Canta Fe, NM 87505

State of New Mexico DEC 0 1912814 Minerals and Natural Resources

Oil Conservation Division RECEIVED 220 South St. Francis Dr. Santa Fe, NM 87505

Form: C-141 Revised August 8, 2011

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

Release Notificati	on and Corrective Actio	[]									
	OPERATOR										
Name of Company: ConocoPhillips	Contact: Spencer Cluff										
Address: 29 Vacuum Complex Lane Facility Name: VGEU Well 034	Telephone No. 575-391-3143 Facility Type: Oil Well										
Surface Owner: NMOCD Mineral Owner	NMOCD	API No. 3002502881									
	ON OF RELEASE										
Unit Letter Section Township Range Feet from the Not G 26 17S 35E 1980 Not		/West Line County LEA									
Latitude 32.8076533080148 Longitude - 103.426925251861		!									
	E OF RELEASE										
Type of Release: Spill	Volume of Release: 92 BBLS	Volume Recovered: 50 BBLS									
Source of Release: Stuffing Box	Date and Hour of Occurrence	Date and Hour of Discovery									
Was Immediate Notice Given?	7/06/2014 2:00 p.m. If YES, To Whom?	7/07/2014 10:00 a.m.									
☐ Yes ☐ No ☐ Not Require	d Geoffrey Leking										
By Whom? Spencer Cluff	Date and Hour: 07/8/2014 3:00 p.										
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Wa	itercourse.									
If a Watercourse was Impacted, Describe Fully.*											
occurred due to worn out packing. The spill area was measured inches deep. The total volume of the spill was 11.75 barrels, 1 the recovered. A work order to remediate the area has been submitted. Describe Area Affected and Cleanup Action Taken.* The spill area 30 ft. X 2 inches deep. Spill stayed on the caliche pad. MSO she I hereby certify that the information given above is true and complete to regulations all operators are required to report and/or file certain release public health or the environment. The acceptance of a C-141 report by should their operations have failed to adequately investigate and remed	arrel of crude oil and 10.75 barrels ed and the area will be remediated a was measured in two sections; 1) 30 ut in the well and placed the packing the best of my knowledge and underst notifications and perform corrective act the NMOCD marked as "Final Report" ate contamination that pose a threat to	of produced water, with 10 barrels according to NMOCD guidelines. Oft. X 18 ft. X 2 inches deep, 2) 12 ft. X ag. and that pursuant to NMOCD rules and ctions for releases which may endanger does not relieve the operator of liability ground water, surface water, human health									
or the environment. In addition, NMOCD acceptance of a C-141 repor- federal, state, or local laws and/or regulations.	does not relieve the operator of respon	sibility for compliance with any other									
•	OIL CONSER	VATION DIVISION									
Signatura: Chausan 4 Mill											
Signature: Spencer A. Claff.	Approved by Environmental Speciali	ist:									
Printed Name: Spencer Cluff	Approved a substitution of the substitution of	1.00.									
-Title: LEAD HSE	Approval Date: /2~ 3~/4	Expiration Date: 2-8-18									
E-mail Address: spencer.a.cluff@conocophillips.com	Conditions of Approval: Site Supe regard. De maloto area as par Nacco Subrit Find C-14, 3 2-82	Peliste Attached [
Daté: 07/8/2014 Phone: 575-391-3143	3 mont from 6-141 1 7-84	1RP-3438									
Attach Additional Sheets If Necessary	,,,,,	ogid 217817									
		NTO 18 34 250 908									

DEC 1 1 2014

P 1019 3425/118

Appendix B Laboratory Analysis



June 26, 2015

HACK CONDER

BASIN ENVIRONMENTAL - HOBBS

419 W. CAIN

HOBBS, NM 88240

RE: VGEU WELL # 34

Enclosed are the results of analyses for samples received by the laboratory on 06/26/15 11:00.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/ga/lab accred certif.html.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2 Haloacetic Acids (HAA-5)
Method EPA 524.2 Total Trihalomethanes (TTHM)
Method EPA 524.4 Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

Celey D. Keine

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene

Lab Director/Quality Manager



Analytical Results For:

BASIN ENVIRONMENTAL - HOBBS HACK CONDER 419 W. CAIN HOBBS NM, 88240

Fax To: (575) 393-0293

Received: 06/26/2015 Sampling Date: 06/26/2015

Reported: 06/26/2015 Sampling Type: Soil

Project Name: VGEU WELL # 34 Sampling Condition: Cool & Intact Project Number: NONE GIVEN Sample Received By: Jodi Henson

Project Location: NOT GIVEN

Sample ID: 5 POINT BOTTOM COMPOSITE @ 2.5 ' (H501655-01)

Chloride, SM4500CI-B	mg,	/kg	Analyze	d By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	240	16.0	06/26/2015	ND	416	104	400	3.92	
TPH 8015M	mg,	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	06/26/2015	ND	176	88.0	200	2.67	
DRO >C10-C28	<10.0	10.0	06/26/2015	ND	202	101	200	2.63	
Surrogate: 1-Chlorooctane	110 9	% 47.2-15	7						
Surrogate: 1-Chlorooctadecane	131	% 52.1-17	6						

Surrogate: 1-Chlorooctadecane

Cardinal Laboratories *=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after competent of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keine



Notes and Definitions

ND Analyte NOT DETECTED at or above the reporting limit

RPD Relative Percent Difference

** Samples not received at proper temperature of 6°C or below.

*** Insufficient time to reach temperature.

- Chloride by SM4500Cl-B does not require samples be received at or below 6°C

Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories *=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whistoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results related only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celeg D. Freene



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

ARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603 (505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325)673-7020

Company Name: ConocoPhillips								Ì	Ł	3//	44 70					-	NAL	YSIS	RE	QUE	ST			
Project Manager: Kyle Norman							P.(0. #.																
Address: 419 W Cain							Co	mpa	any:	В	asin						ဖ							
City: Hobbs State: NM	Zip	: 88	240				Att	n:									딞							
Phone #: 575-393-2967 Fax #: 575-39							Ad	dres	ss: 4	419	9 W Cain						<u>.</u>							
Project #: Project Owne	r:						Cit	y: H	lob	bs				Σ		-	\$							
Project Name: 6							Sta	ate:	NM		Zip: 8824	0	es			直	۳							
Project Location: UGEU Well #34							State: NM Zip: 88240 Phone #: 575-393-2967 Fax #: 575-393-0293 PRESERV. SAMPLING								Texas TPH	Cations/Anions	TDS							
Sampler Name: Chris Flores											93-0293		일	Φ	품	ä	ပ္ပို	티						
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Relinquished By:	Date: Received By:	Phone Result: ☐ Yes ☑ No Add'l Phone #:
	Time:	Fax Result: ☐ Yes ☑ No Add'l Fax #: REMARKS:
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Relinquished By:	Date: 2 1 Received By:	email results:
/	Time:	hconder@basinenv.com; knorman@basinenv.com;
	77:80	jkamplain@basinenv; lflores@basinenv; lweinheimer@basinenv;
Delivered By: (Circle One)	Sample Condition CHECKED BY:	cursanic@basinenv; sedwards@basinenv
Sampler - UPS - Bus - Other:	Cool Intact (Initials)	environmental tech: CFleres @basinenv
	No No (// V	

[†] Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476





July 07, 2015

KYLE NORMAN

BASIN ENVIRONMENTAL - HOBBS

419 W. CAIN

HOBBS, NM 88240

RE: VGEU WELL # 34

Enclosed are the results of analyses for samples received by the laboratory on 07/02/15 8:59.

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Method EPA 524.2 Total Trihalomethanes (TTHM)
Method EPA 524.4 Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

Lope S. Moreno

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Hope S. Moreno For Celey D. Keene

Lab Director/Quality Manager



Analytical Results For:

BASIN ENVIRONMENTAL - HOBBS KYLE NORMAN 419 W. CAIN HOBBS NM, 88240

Fax To: (575) 393-0293

Received: 07/02/2015 Sampling Date: 07/01/2015

Reported: 07/07/2015 Sampling Type: Soil

Project Name: VGEU WELL # 34 Sampling Condition: Cool & Intact
Project Number: NONE GIVEN Sample Received By: Jodi Henson

Project Location: NOT GIVEN

Sample ID: BACKFILL Pt.1 (H501702-01)

Chloride, SM4500CI-B	mg,	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	208	16.0	07/06/2015	ND	432	108	400	0.00	
TPH 8015M	mg	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	07/06/2015	ND	197	98.6	200	3.89	
DRO >C10-C28	<10.0	10.0	07/06/2015	ND	206	103	200	3.95	
Surrogate: 1-Chlorooctane	104	% 47.2-15	7						

Surrogate: 1-Chlorooctane 104 % 47.2-157
Surrogate: 1-Chlorooctadecane 106 % 52.1-176

Sample ID: BACKFILL Pt.2 (H501702-02)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	07/06/2015	ND	432	108	400	0.00	
TPH 8015M	mg	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	07/06/2015	ND	197	98.6	200	3.89	
DRO >C10-C28	<10.0	10.0	07/06/2015	ND	206	103	200	3.95	

Surrogate: 1-Chlorooctane 90.7 % 47.2-157 Surrogate: 1-Chlorooctadecane 72.9 % 52.1-176

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Lope S. Moreno



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*** Insufficient time to reach temperature.

- Chloride by SM4500Cl-B does not require samples be received at or below 6°C

Samples reported on an as received basis (wet) unless otherwise noted on report

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Lope S. Moreno

RDINAL LABORATORIES

ConocoPhillips

Sampler - UPS - Bus - Other:

Company Name:

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

ANALYSIS REQUEST

Cflores

@basinenv

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603 (505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325)673-7020

Project Manager: k	(vie Norman							F	P.O.	. #:	Ñ.														i - 1	/ II		- 1
Project Manager: Kyle Norman Address: 419 W Cain									Con	npa	iny	: B:	asin								Sc		1 9					
City: Hobbs State: NM Zip: 88240								1	Attn	1:											.0							
Phone #: 575-393-								1	Add	ires	ss:	419	9 W	Cain	1			_			Cations/Anions							
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FOR LAB USE ONLY	May 11000)	T	T	T		MATE	RIX	_		PRE				AMPL	ING		O	直		l e	l e	2						1 - 1
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(Ipitials)

environmental tech:

BILL TO

[†] Cardinal cannot accept verbal changes. Please fax written changes to 505-393 2476

Appendix C Photo Documentation

ConocoPhillips VGEU Well 034

Unit Letter G, Section 26, T17S, R35E



Initial release area, facing northeast

11/18/14



Scraping release, facing north

6/23/15



Initial release area, facing north

11/18/14



Excavating release, facing northwest

6/23/15



Exporting soil, facing southeast

6/23/15



Backfilling excavation, facing south

7/1/15



Importing caliche, facing northeast

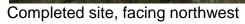
6/23/15



Completed site, facing north

7/2/15





7/2/15



Completed site, facing south

7/2/15

Appendix D Final C-141

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

Form C-141
Revised August 8, 2011

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

			Rele	ease Notific	cation	and Co	rrective A	ction									
						OPERA?	ГOR	[Initia	al Report 🛛 Final Report							
		ConocoPhill				Contact:											
		n Complex I	ane			Telephone No.											
Facility Na	ne: VGEU	Well 034		Note:		Facility Typ	e: Oil Well										
Surface Ow	ner: NMO	CD		Mineral C)wner: l	NMOCD		. 3002502881									
				LOCA	TOITA	OF RE	LEASE										
Unit Letter	Section	Township	Range	Feet from the		South Line	Feet from the	East/W	est Line	County							
G	26	17S	35E	1980	North		2200	East		LEA							
<u> </u>		1,5			L) Y:4 J		1 15450		DDN							
						OF REL	e-103.426794 FASE										
Type of Rele	ase: Spill			IMI	UKE		Release: 92 BBL	S	Volume F	Recovered: 50 BBLS							
Source of Re		ing Box				1	lour of Occurrence			Hour of Discovery							
		6				7/06/2014				10:00 am							
Was Immedia	ate Notice (If YES, To											
			Yes	No 🗌 Not Re	equired	Geoffrey L	eking										
By Whom?	Spencer Clu	ıff				Date and Hour: 7/08/2014 3:00 pm											
Was a Water	course Reac			•		If YES, Volume Impacting the Watercourse.											
			Yes 🛚	No													
If a Watercou	irse was Im	pacted, Descr	be Fully.*	•		•											
On July 6, 20 stuffing box. X 2 inches de work order to Describe Are the base of th DRO values of caliche impanalysis of Po	14 at appro The spill of the sp	ximately 1400 courred due to tal volume of the area has be and Cleanup An and sent to a ct. A total of ackfill. A total of a chloride	o hrs, MST o worn out the spill we een submit action Tak a commerce 140 yards al of two s level of 20	F, a stuffing box let packing. The spiral states and the area of the release that laboratory for of contaminated samples of the imp	eak occur all area value area value area will be rea area wanalysis soil were soorted so	rred at the E vas measured of crude oil a emediated ac as excavated s. Laboratory exported and il were taken DRO values of	vGSAU 035. MS in two sections; and 10.75 barrels of cording to NMOO to 2.5 ft and a 5 p analysis returned disposed of at a and sent to a confinon-detect. Lal	SO isolate 1) 30 ft. 2 of produce CD guidel point botte d a chloric NMOCD nmercial boratory a	d the well X 18 ft. X led water, ines. om compode value of approved laboratory unalysis of	- RR II - MCBU - Buckeye: I and changed the packing in the 2 inches deep, 2) 12 ft. X 30 ft. with 10 barrels recovered. A osite sample was collected from if 240 mg/kg and GRO and I facility. A total of 230 yards if for analysis. Laboratory if Point 2 returned chloride, ding location.							
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 are regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endange 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 liabilishould their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human hor 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.										eases which may endanger eve the operator of liability , surface water, human health							
							OIL CONS	SERVA	TION	DIVISION							
Signature:	gan "	Tohn	·						1.								
Printed Name					A	Approved by	Environmental S _J	Jamit	-Uye^								
Printed Name	CHATISTON S	Supe	estson		F	Approval Dat	e: 01/27/2016	E>	opiration I	/// Pate:							
E-mail Addre	ss: Scan	. to robin	50n @	Cop, com 575-391-514	}	Conditions of	Approval:			Attached							

^{*} Attach Additional Sheets If Necessary