



RECEIVED

By JKeyes at 12:38 pm, Aug 24, 2016

APPROVED

2 Confirmation bottom samples to be taken as indicated on map.

CONOCOPHILLIPS

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

EVGSAU 3236-004
(1RP-3923)

Corrective Action Plan

API No. 30-025-02979

Release Date: October 15th, 2015

Unit Letter K, Section 32, Township 17S, Range 35E



PO Box 2948 | Hobbs, NM 88241 | Phone 575.393.2967

August 23, 2016

Jamie Keyes

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

**RE: Corrective Action Plan
ConocoPhillips EVGSAU 3236-004 (1RP-3923)
UL/K sec. 32 T17S R35E
API No. 30-025-02979**

Mr. Keyes:

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

Background and Previous Work

The site is located approximately 1.7 miles southeast of Buck Eye, New Mexico. The initial C-141 states that the site is located at UL/F Sec. 32 T17S R35E. However, GIS mapping shows the site to be located within UL/K Sec. 32 T17S R35E. NM OSE, BLM and Basin installed monitor well records indicate that groundwater will likely be encountered at a depth of approximately 75 +/- feet.

On October 15th, 2015, CoP discovered a flow line leak. A total of 9 barrels produced water and 10 barrels of oil was released over 3,182 sq ft of pasture land. 4 barrels of produced water and 4 barrels of oil was recovered. NMOCD was notified of the release on October 16th, 2015, and an initial C-141 was submitted same day. NMOCD approved the initial C-141 on October 16th, 2015 (Appendix A).

Basin personnel were on site to assess the release January 27th, 2016. The release was mapped and photographed (Figure 1). On August 10th, 2016 Field samples were collected at surface and taken with depth and representative samples were sent to a commercial laboratory for analysis (Appendix B). Photo Documentation of these activities may be found in Appendix C.

Corrective Action Plan

Based on the assessment, the release area around vertical 1 will be excavated to a depth of 2 feet bgs. The release area around vertical 2 will be excavated to a depth of 1.5 feet bgs. Once all excavations are complete, discrete wall samples from the excavation will be collected and field

tested for chlorides and organic vapors. If the field data indicates that the wall samples will not achieve chloride, Gasoline Range Organics (GRO), Diesel Range Organics (DRO) readings below regulatory standards, the walls of the excavation will be extended until field testing indicates that all constituents from the wall samples will return values below regulatory standards. The samples will then be taken to a commercial laboratory to confirm that all constituents return readings are below regulatory standards.

All excavated soil will be taken to a NMOCD approved facility for disposal. Clean soil will be imported to the site to serve as backfill. A sample of the backfill soil will be taken to a commercial laboratory to confirm that the chloride reading is below regulatory standards. The lease pad will be backfilled with clean, imported caliche and the pasture will be backfilled with clean, imported top soil. The site will be contoured to the surrounding location.

Revegetation of the site will be performed as follows:

Disturbed areas associated with the remediation efforts will be reseeded. If after one growing season the vegetation has not taken hold, seeding may need to be repeated until revegetation is successful. The seed will be spread using a hand-held broadcaster and the area raked or dragged to cover the seed. Because the seed will be broadcast, the pounds per acre will be doubled. BLM #2 LPC seed mix will be used.

The seed mixture will be planted in the amounts specified in pounds of pure live seed (PLS) per acre. Commercially sold seed will be either certified or registered. The area will be seeded following backfilling of the excavated area.

The site will be visited on a quarterly basis to assess the establishment of vegetative growth. Staff personnel performing the site visit will also look for the presence of noxious weeds at the site. If a noxious weed is observed at the site, CoP will determine the most effective manner to eradicate it.

Once these activities have been completed, a report will be sent to NMOCD and BLM requesting 'remediation termination' and site closure.

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,

A handwritten signature in dark ink, appearing to read "Kyle Norman", followed by a horizontal line.

Kyle Norman
Project Lead
Basin Environmental Service Technologies
(575) 942-8542

Attachments:

Figure 1 – Proposed Excavation

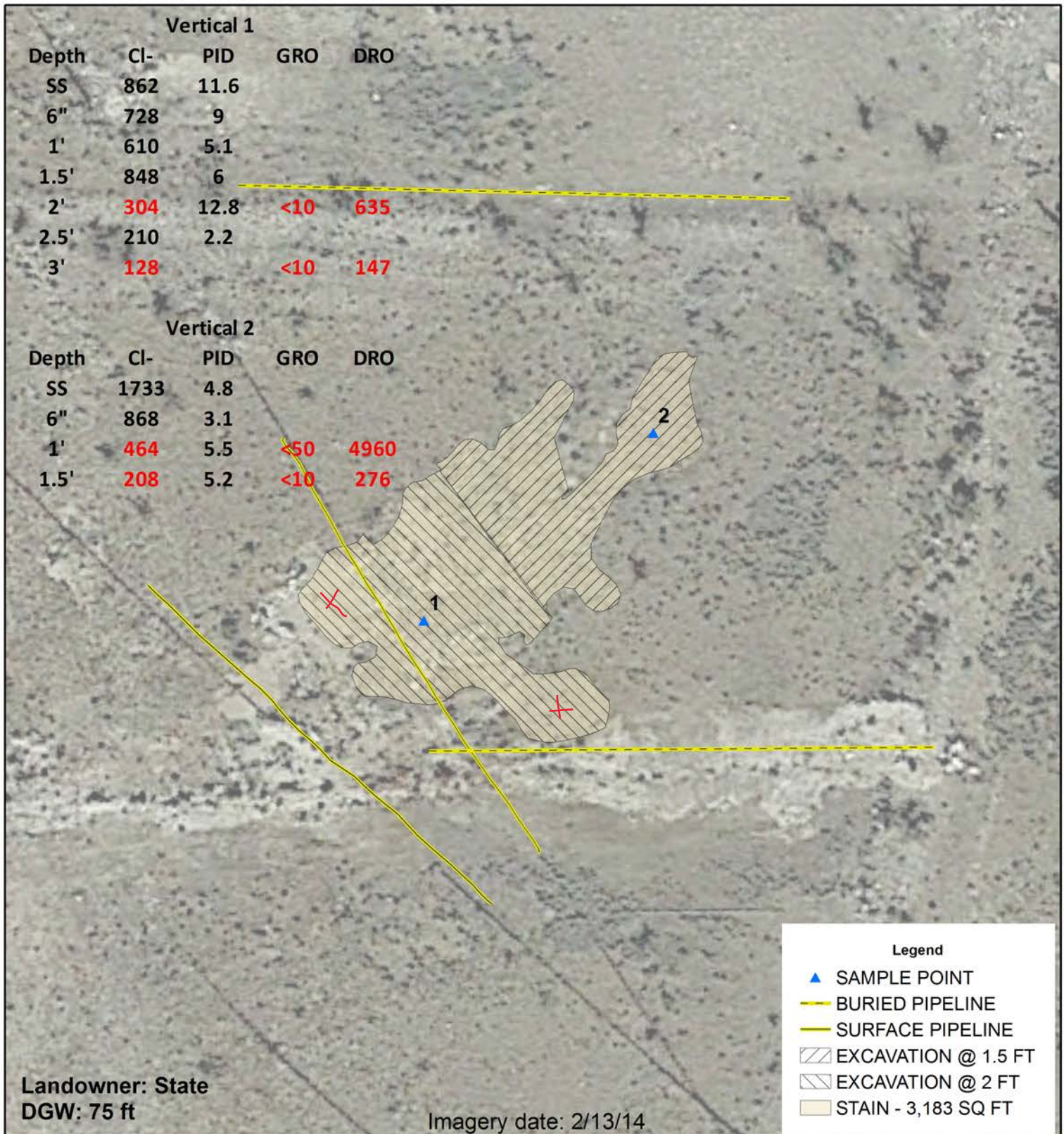
Appendix A – Initial C-141

Appendix B – Laboratory Analysis

Appendix C – Photo Documentation

Figures

Proposed Excavation



CONOCOPHILLIPS
EVGSAU 3236-004

1RP-3923

UL K SECTION 32
T-17-S R-35-E
LEA COUNTY, NM

Underground facilities are
spatially projected
and need to be field verified.

GPS: 32.790675 -103.480333

0 10 20

HHH Feet

GPS date: 1/27/16 JK, 8/10/16 KN

Drawing date: 8/15/16

Drafted by: T. Grieco



Appendix A

Intial 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

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 8, 2011

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

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: ConocoPhillips	Contact: Spencer Cluff
Address: 29 Vacuum Complex Lane	Telephone No. 575-746-7248
Facility Name: EVGSAU 3236-004	Facility Type: Well

Surface Owner: NMOCD	Mineral Owner: NMOCD	API No. 30-025-02979
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LOCATION OF RELEASE

Unit Letter F	Section 32	Township 17S	Range 35E	Feet from the 1980	North/South Line North	Feet from the 1980	East/West Line West	County LEA
-------------------------	----------------------	------------------------	---------------------	------------------------------	----------------------------------	------------------------------	-------------------------------	----------------------

Latitude 32.7933311 Longitude 103.4820251 NAD83

NATURE OF RELEASE

Type of Release: Spill	Volume of Release: 19 BBLS	Volume Recovered: 8 BBLS
Source of Release: Flow line	Date and Hour of Occurrence 10/15/2015 12:00 am	Date and Hour of Discovery 10/15/2015 2:00 pm
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Jamie Keyes	
By Whom? Spencer Cluff	Date and Hour: 10/16/2015 9:20 am	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

On Oct. 15, 2015 at 1400 hrs MDT a flow line leak occurred at the EVGSAU 3236-004, which released 8 BPW and 10 BO with 4 BPW and 4 BO recovered. Spill area is approximately 75'x75' with a depth of 2" in pasture area and will be remediated according to NMOCD and COPC guidelines.

Describe Area Affected and Cleanup Action Taken.*

Immediate action by the MSO was to shut down the well and isolate the flowline. A work order has been submitted to repair the line. The affected area will be remediated according to NMOCD guidelines.

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

OIL CONSERVATION DIVISION

Signature: <i>Spencer A. Cluff</i>	Approved by Environmental Specialist: <i>Jamie Keyes</i>	
Printed Name: Spencer A. Cluff	Approval Date: 10/16/2015	Expiration Date: 12/16/2015
Title: LEAD HSE	Conditions of Approval: Discrete site samples required. Delineate and remediate per NMOCD guidelines. Geotagged photos of remediation required.	
E-mail Address: spencer.a.cluff@conocophillips.com	Attached <input type="checkbox"/> IRP 3923	
Date: 10/16/2015	Phone: 575-746-7248	

* Attach Additional Sheets If Necessary

pJXK1528944902

nJXK1528944722

Appendix B

Laboratory Analysis

Basin Environmental Service Technologies, LLC
P.O. Box 2948 Hobbs, NM 88241
Phone 575.393.2967



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

August 12, 2016

KYLE NORMAN

Basin Environmental Service

P.O. Box 301

Lovington, NM 88260

RE: EVGSAU 3236-004

Enclosed are the results of analyses for samples received by the laboratory on 08/11/16 11:30.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-16-8. 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/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited 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.

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,

A handwritten signature in black ink that reads "Coley D. Keene". The signature is written in a cursive, flowing style.

Celey D. Keene

Lab Director/Quality Manager

Analytical Results For:

Basin Environmental Service
KYLE NORMAN
P.O. Box 301
Lovington NM, 88260
Fax To: (575) 396-1429

Received: 08/11/2016
Reported: 08/12/2016
Project Name: EVGSAU 3236-004
Project Number: NONE GIVEN
Project Location: CONOCO PHILLIPS

Sampling Date: 08/10/2016
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: PT. 1 @ 2' (H601791-01)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	304	16.0	08/11/2016	ND	448	112	400	3.64	
TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/12/2016	ND	193	96.3	200	2.73	
DRO >C10-C28	635	10.0	08/12/2016	ND	197	98.4	200	3.77	
Surrogate: 1-Chlorooctane	85.6 %	35-147							
Surrogate: 1-Chlorooctadecane	114 %	28-171							

Sample ID: PT. 2 @ 1' (H601791-02)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	464	16.0	08/11/2016	ND	448	112	400	3.64	
TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<50.0	50.0	08/12/2016	ND	193	96.3	200	2.73	
DRO >C10-C28	4960	50.0	08/12/2016	ND	197	98.4	200	3.77	
Surrogate: 1-Chlorooctane	96.1 %	35-147							
Surrogate: 1-Chlorooctadecane	153 %	28-171							

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 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 relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

Basin Environmental Service
KYLE NORMAN
P.O. Box 301
Lovington NM, 88260
Fax To: (575) 396-1429

Received: 08/11/2016
Reported: 08/12/2016
Project Name: EVGSAU 3236-004
Project Number: NONE GIVEN
Project Location: CONOCO PHILLIPS

Sampling Date: 08/10/2016
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: PT. 2 @ 1.5' (H601791-03)

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	208	16.0	08/11/2016	ND	448	112	400	3.64	
TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/12/2016	ND	193	96.3	200	2.73	
DRO >C10-C28	276	10.0	08/12/2016	ND	197	98.4	200	3.77	
Surrogate: 1-Chlorooctane	86.0 %	35-147							
Surrogate: 1-Chlorooctadecane	88.6 %	28-171							

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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

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Celey D. Keene, Lab Director/Quality Manager



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

Handwritten: RUSH

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: Conoco Phillips

Project Manager: Kyle Norman

Address:

City:

State:

Zip:

Phone #:

Fax #:

Project #:

Project Owner:

Project Name:

Project Location:

Handwritten: EUGSAD 3236-004

Sampler Name:

Handwritten: Kyle Norman

Fax #:

BILL TO

P.O. #:

Company: Basin Environmental

Attn:

Address: 419 W. Cain

City: Hobbs

State: NM Zip: 88240

Phone #:

ANALYSIS REQUEST

Chlorides

TPH 8015 M

BTEX

Texas TPH

Complete Cations/Anions

TDS

Lab I.D.

Sample I.D.

Handwritten: H601791

Handwritten:
1 P.1 @ 2 ft.
2 P.2 @ 1 ft.
3 P.2 @ 1.5 ft.

(G)RAB OR (C)OMP.

CONTAINERS

GROUNDWATER

WASTEWATER

SOIL

OIL

SLUDGE

OTHER :

ACID/BASE:

ICE / COOL

OTHER :

DATE TIME

Handwritten:
8-10-16 2:00
8-10-16 2:30
8-10-16 3:00

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 the client for the 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 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 services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Relinquished By:

Date: 8-11-16

Received By:

Handwritten: Kyle Norman

Date: 11-30

Handwritten: Justin Wright

Relinquished By:

Date:

Received By:

Delivered By: (Circle One)

Sampler - UPS - Bus - Other:

Handwritten: -16.8c

Sample Condition
☒ Cool ☐ Intact
☒ Yes ☐ No

CHECKED BY:
Handwritten: Justin Wright

Phone Result: ☐ Yes ☒ No

Fax Result: ☐ Yes ☒ No

REMARKS:

email results: knorman@basinenv.com;
jkamplain@basinenv.com; tgrieco@basinenv.com

Handwritten: Justin Wright

* Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

Handwritten: #75



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

August 15, 2016

KYLE NORMAN

Basin Environmental Service

P.O. Box 301

Lovington, NM 88260

RE: EVGSAU 3236-004

Enclosed are the results of analyses for samples received by the laboratory on 08/12/16 11:10.

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

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Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

Celey D. Keene

Lab Director/Quality Manager

Analytical Results For:

Basin Environmental Service
KYLE NORMAN
P.O. Box 301
Lovington NM, 88260
Fax To: (575) 396-1429

Received: 08/12/2016
Reported: 08/15/2016
Project Name: EVGSAU 3236-004
Project Number: NONE GIVEN
Project Location: CONOCO PHILLIPS

Sampling Date: 08/10/2016
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Celey D. Keene

Sample ID: PT. 1 @ 3' (H601799-01)**Chloride, SM4500Cl-B****mg/kg****Analyzed By: AC**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	128	16.0	08/12/2016	ND	448	112	400	3.64	

TPH 8015M**mg/kg****Analyzed By: MS**

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	08/12/2016	ND	197	98.4	200	0.494	
DRO >C10-C28	147	10.0	08/12/2016	ND	197	98.7	200	0.0887	

Surrogate: 1-Chlorooctane 87.3 % 35-147

Surrogate: 1-Chlorooctadecane 95.0 % 28-171

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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

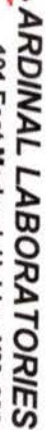
Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

BILL TO

ANALYSIS REQUEST

[illegible]

PLEASE NOTE: Liability and Damages. Cardinal's liability and claims exclusive remedy for any claim arising whether based in contract or tort shall be limited to the amount paid by the client for the 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 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 services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Requisitioned By: <i>Wink</i>	Date: <i>8-12-16</i>	Received By: <i>CTD</i>	Phone Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Phone #:
	Time: <i>11:10</i>	Date: <i>8-12-16</i>	Fax Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Add'l Fax #:
Relinquished By:	Time:		REMARKS: email results: knorman@basinenv.com; jkamplain@basinenv.com; tgrieco@basinenv.com	
Delivered By: (Circle One)	Received By: <i>CTD</i>			
Sampler - UPS - Bus - Other:	Sample Condition Cool <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Intact <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	CHECKED BY: (initials) <i>cd # 75</i>	<i>Rush</i>	

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

Appendix C

Photo Documentation

Basin Environmental Service Technologies, LLC
P.O. Box 2948 Hobbs, NM 88241
Phone 575.393.2967

ConocoPhillips EVGSAU 3236-004

Unit Letter K, Section 32, T17S, R35E



Initial Release, facing NE

1/27/2016



Initial Release, facing SW

1/27/2016



Installing vertical #1, facing W

8/10/2016



Installing vertical #2, facing S

8/10/2016