## R. T. HICKS CONSULTANTS, LTD.

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Since 1996 Artesia 🔺 Carlsbad 🔺 Durango 🔺 Midland

March 12, 2018



Mr. David Harwell ADVANCE ENERGY PARTNERS HAT MESA, LLC 11490 Westheimer Rd. STE 950 Houston, TX 77077 Via Email

RE: Advance Energy – Merchant Containment/Merchant State 503H Release(s) Delineation Plan and Potential Corrective Actions - 1RP-4953

Dear Mr. Harwell:

Hicks Consultants has elected to use the proposed language in NMOCD's application to repeal and replace Rule 19.15.29 NMAC (R&R Part 29) as guidance for delineation of each release location and identification of potential corrective actions. The proposed R&R Part 29 can be found at the OCD website:

http://ocdimage.emnrd.state.nm.us/Imaging/FileStore/santafeadmin/cf/312025/15959 1 cf.pdf .

The OCD is the applicant for the Rule Making and, as we understand the process, OCD worked with operators and other stakeholders to develop the text and concepts presented in the proposal. With respect to the releases of produced water caused by leakage of water transfer pipes during the hydraulic stimulation of Merchant State 503H well, the most salient points of the proposed language are presented near-verbatim below as we deleted certain text that did not apply to these releases.

## **Requirements Outlined in Proposed Rule**

### **19.15.29.7 DEFINITIONS**

1. "Responsible Party" means the operator, as defined in 19.15.2 NMAC. Notwithstanding the foregoing, the division, in its sole discretion, may also consider a person causing the release, or controlling the location of the release as the responsible party.

### 19.15.29.11 SITE ASSESSMENT/CHARACTERIZATION

- 2. The responsible party must submit information characterizing the release to the appropriate division district office within 90 days of discovery of the release...
- 3. The responsible party must determine the depth to ground water where the release occurred.
- 4. The responsible party must determine the horizontal distance from all known water sources within a half mile of the release including private and domestic water sources.
- 5. The responsible party must determine the horizontal distance to the nearest significant watercourse as defined in Subsection P of 19.15.17.7 NMAC [Pit Rule].

- 6. The responsible party must delineate the release horizontally and vertically using Table I constituents or other constituents as appropriate for the type of the release.
- 7. If the release occurred outside of a lined containment area and is in an area where depth to ground water is greater than 50 feet and less than or equal to 100 feet, the responsible party must delineate the vertical extent of the release to the greater of 600 mg/kg chloride or background chloride level, if:
  - a. the release contains produced water that exceeds 10,000 mg/1 of chloride and
  - b. the release is of an unknown quantity or results in greater than 200 barrels of unrecovered produced water.

NOTE: As indicated in the following section of this transmittal, the depth to groundwater at all three locations is greater than 100 feet and item 7, above, does not apply.

### 19.15.29.12 REMEDIATION AND CLOSURE

- 8. The responsible party must remediate all releases regardless of volume
- 9. The responsible party must complete division-approved remediation for releases that endanger public health or the environment within 90 days of division approval of a remediation plan or with an abatement plan the responsible party submitted to the division in accordance with 19.15.30 NMAC.

NOTE: If a release does not endanger public health or the environment, the 90-day completion time constraint does not apply

10. ) The responsible party shall remediate the impacted surface area of a release not occurring on a lined, bermed or otherwise contained exploration, development, production or storage site to meet the standards of Table I of 19.15.29.12 NMAC and contain a minimum of four feet of non-waste material containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0. The soil cover must include a top layer which is either the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater.

Table I is Attachment A to this submittal.

### Site Assessment/Characterization Plan

### **Background Environmental Data**

Figures 1-9 demonstrate that the release sites are not within

- A. 300 feet of any continuously flowing watercourse or any other significant watercourse or 200 feet of any lakebed, sinkhole or playa lake (measured from the ordinary high-water mark);
- B. 300 feet from an occupied permanent residence, school, hospital, institution or church;
- C. 500 feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes. However, as Figure 1 shows, two sites are within 1000 feet of any fresh water well (CP 1355); Because the well is hydraulically up-gradient from the release sites and, more importantly,

- a. The top of the groundwater zone for this well is at a depth of 925 feet (see well log in Attachment B)
- b. The well has cement grout circulated to the surface from ground level to a depth of 757 feet
- c. The screened interval is 874-1192 feet below grade and
- d. The static water level after drilling is reported as 582 feet, or 343 feet above the groundwater zone and 175 feet above the base of the annular seal.

the location of this will within the arbitrary 1000-foot radius of the spill is of no environmental consequence.

- D. within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to Section 3-27-3 NMSA 1978 as amended,
- E. within 100 feet of a wetland;
- F. within the area overlying a subsurface mine;
- G. within an unstable area; or
- H. within a 100-year floodplain.

Thus, the closure standard (and the delineation limits) for chloride for these releases are

Closure Criteria Depth (below ground surface)	Chloride Limit
0-4 feet	600 mg/kg
>4 feet	20,000 mg/kg

### **Initial Sampling Results and Observations**

Table A (below) and the laboratory reports in Attachment C provides the results of the initial characterization of these releases and Plate 10 provides the location of each release on a January 30, 2016 aerial photo. The data demonstrate that produced water has

saturated the uppermost 2-feet of the sandy soil horizon. Based upon work at the nearby Tomahawk release site, the excavation of the Merchant produced water recycling containment and observations along the roadway, we anticipate encountering hard caliche at depths as shallow as 5 feet or up to 15 feet below grade. Stabilized dunes cover most of the area and this sandy soil will rest upon the caliche.

Sample 32 26 50 BH2 is on the top of a sand dune on the south side of the lease road. We expect penetration of chloride to exceed 2500 mg/kg in the upper 4-feet of the dune beneath the footprint of the release. BH1 from this same location is within the lease road. The data suggest that high chloride concentrations from non-Advance/Amtex sources may be responsible for the 2900 mg/kg value at 12 inches. The depth to hard caliche at this location is difficult to predict.

Site	Location	Depth	CI
32 26 50	BH2	6	5200
33 26 50	BH2	12	5400
34 26 50	BH2	24	5500
35 26 50	BH1	6	840
36 26 50	BH1	12	2900
Battle 34	BH1	6	3100
Battle 34	BH1	12	95
Battle 34	BH1	24	220
Battle 34	BH2	6	6800
Battle 34	BH2	12	2100
Battle 34	BH2	16	1900
Battle 34	BH3	6	4100
Battle 34	BH3	12	1300
Battle 34	BH3	24	1100
West of MP Jnct	BH-1	6	3300
West of MP Jnct	BH-1	12	3600
West of MP Jnct	BH-1	24	5100

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The Battle 34 location is the site of three separate release incidents that occurred during the hydraulic stimulation of Merchant State 503H. Less sandy soil exists at this location and we expect chloride concentrations to be less than the 600 mg/kg limit at 4 feet. Hard caliche should be present at a depth of less than 10 feet.

At the West of MP Jnct (Merchant Recycling Containment Pit) location, sandy soil is present to a depth of at least 2 feet. We expect hard caliche to exist at a depth of about 5-10 feet. Here, chloride will probably exceed the 600 mg/kg closure criteria to the top of the hard caliche horizon.

The data clearly demonstrate that impact above the 20,000 mg/kg closure criteria established by the proposed R&R Rule 29 will not be exceeded at depths greater than 4 feet.

### **Proposed Additional Characterization**

The footprint of each of the releases has been mapped by Bradley Blevins of Merchant Livestock (Attachment D). Hicks Consultants inspected the sites with Mr. Blevins and we believe the sketches of Merchant Livestock are accurate and of better quality that we could produce 1-2 weeks after the events.

For each of the three locations that are the subject of this submission, the plan described below was implemented on March 6-7, 2018, with a few minor modifications in the field.

- 1. Drill or excavate near the source of the release to a depth of 5-15 feet, penetrating a minimum of 2 feet into the underlying hard caliche (if encountered).
- 2. Collect samples from the boring or deep trench for chloride analysis at
  - a. 1 foot
  - b. 2-3 feet
  - c. 4 feet
  - d. 6 feet, and if possible,
  - e. 9 feet.
- 3. Advance and Merchant Livestock representatives will select 2-3 additional locations within the footprint of the release, to collect samples for analysis of chloride at
  - a. 1 foot
  - b. 2-3 feet
  - c. 4 feet

This plan does not contemplate sampling along the busy lease road due to safety concerns as well as the inability to determine if chloride concentration in the road is due to the release caused by the water transport company or past releases along the road.

The purpose of the characterization program is to select the appropriate remedy for each release location that is, in order of importance:

- i. protective of fresh water and the environment,
- ii. creates the greatest net environmental benefit,
- iii. complies with existing and proposed OCD Rules, and

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iv. is cost-effective.

There are three possible remedies that may be applied to these site:

- excavation and removal
- natural flushing by precipitation
- artificial flushing using fresh groundwater

After we obtain the data from the characterization, we will evaluate these three options to determine the corrective action that best suits each site. Please contact me if you have any questions concerning this submission.

Sincerely, R.T. Hicks Consultants, Ltd.

Randall Hicks Principal

Copy: Merchant Livestock Clabe Pearson (clabe@merchantlivestock.com) Brad Blevins (<u>bblevins5252@gmail.com</u>)

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#### M:\Advance Energy\PW Frac Releases\pitruleTemplate\Figures\Figure2\_topographyGW.mxd



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### M:\Advance Energy\PW Frac Releases\pitruleTemplate\Figures\figure9\_femaFlood.mxd

<image/>		Legend   200 ft   200 ft   300 ft   300 ft   1000 ft	ion ayer but undetermined bod hazard analysis (Zone D).
w E 0 0.125 0.25 s Miles	R.T. Hicks Consultants, Ltd 901 Rio Grande Blvd NW Suite F-142 Albuquerque, NM 87104 Ph: 505.266.5004	FEMA Flood Map Advanced Energy Partners Hat Mesa, LLC Merchant Containment/Merchant State 503H Release(s)	Plate 9 February 2018

#### M:\Advance Energy\PW Frac Releases\pitruleTemplate\Figures\Plate 10 Release Locations.mxd



## Attachment A

	Tal	ble I	
	Closure Criteria for Soi	Is Impacted by a Release	
Depth below bottom of release to ground water less than 10,000 mg/l TDS	Constituent	Method*	Limit**
$\leq$ 50 feet	Chloride***	EPA 300.0	600 mg/kg
	ТРН	EPA SW-846 Method 8015M	100 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg
51 feet-100 feet	Chloride***	EPA 300.0	10,000 mg/kg
	ТРН	EPA SW-846 Method 8015M	2,500 mg/kg
	GRO+DRO	EPA SW-846 Method 8015M	1,000 mg/kg
•	BTEX	EPA SW-846 Method * 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8260B	10 mg/kg
➤ 100 feet	Chloride***	EPA 300.0	20,000 mg/kg
	ТРН	EPA SW-846 Method 8015M	2,500 mg/kg
	GRO+DRO	EPA SW-846 Method 8015M	1,000 mg/kg
	BTEX.	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg

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## Attachment B – Well Log



# WELL RECORD & LOG

## **OFFICE OF THE STATE ENGINEER**

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STALE ENGINEER OFFICE

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	4'	28'	24'	Caliche	CY ON
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WEL	815'	840'	25'	Blue Clay & Shale	
e e	840'	925'	85'	Red and Brown Shale (some sandrock)	C Y O N
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## WELL RECORD & LOG

### OFFICE OF THE STATE ENGINEER

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	DEPTH ( FROM	feet bgl) TO	THICKNESS (feet)	COLOR AND TYPE OF MATERIAL ENCOUNTERED - INCLUDE WATER-BEARING CAVITIES OR FRACTURE ZONES (attach supplemental sheets to fully describe all units)	WATER BEARING? (YES / NO)	ESTIMATED YIELD FOR WATER- BEARING
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	4 79'	20	2 <del>4</del> 07'	Calectie Sand and Clay		
	120	260'	140'	Bed Clay		
	120	757	407	Red and Brown Shale and Clay(come blue)		
	200	/3/	49/ CO1	Red and Brown Shale and Clay(some blue)		
ELC.	737	015	00 05'	Red and brown Shale		
्र	815	040	25	Dide Cidy and Shale		· · · · · · · · · · · · · · · · · · ·
ි ප	840	925	85	Red and Brown Shale(some sandrock)		
ΓŌ	925	975	50	Watersand and Gravel		
G	975	1185	210	Watersand(brown sandrock)		
010	1185'	1192'	7'	Red Shale		
)GE						
DRC						
HY					$O^{\mathbf{Y}} O^{\mathbf{N}}$	
	-				$O^{Y} O^{N}$	
					$C^{Y} C^{N}$	
					$O^{Y} O^{N}$	
			1		$O^{\mathbf{Y}} O^{\mathbf{N}}$	
					O <sup>Y</sup> O <sup>N</sup>	
					C Y C N	
	METHOD U	JSED TO ES	STIMATE YIELI	O OF WATER-BEARING STRATA: ( PUMP	TOTAL ESTIMATED	
	C AIR LIF	т С	BAILER C	OTHER - SPECIFY:	WELL YIELD (gpm): ~	, v
		TEST		ACH A CODY OF DATA COLLECTED DIDING WELL TESTNIC, NO		
N. S.	WELL TES	ST STAR	T TIME, END TI	ME, AND A TABLE SHOWING DISCHARGE AND DRAWDOWN OVE	R THE TESTING PERIO	D.
ISIC	MISCELLA	NEQUS INF	ORMATION		the set of	Made from the contra
ERV						
SUP	0' to 757	<sup>7</sup> drilled w	ith mud. 757	' to 1192' drilled with air and foam.		
RIG						
EST;	PRINT NAT	ME(S) OF D	RILL RIG SUPE	RVISOR(S) THAT PROVIDED ONSITE SUPERVISION OF WELL CON-	TRUCTION OTHER TH	
E.					indenion offick in	AN EICENDEL.
	THE UNDE	RSIGNED I	IEREBY CERTI	FIES THAT, TO THE BEST OF HIS OR HER KNOWLEDGE AND BELI	F, THE FOREGOING IS	A TRUE AND
Z	CORRECT   AND THE	RECORD O PERMIT HO	F THE ABOVE I LDER WITHIN :	DESCRIBED HOLE AND THAT HE OR SHE WILL FILE THIS WELL RI 20 DAYS AFTER COMPLETION OF WELL DRILLING:	CORD WITH THE STAT	TE ENGINEER
AT		_	10			
NG.		h.	Han.	Carky Glassing S	The lice	
1 <b>9</b>		SIGNAT		ER / PRINT SIGNEE NAME		<u> </u>
Star Star	1. aaloonta (j. 1. 1925)					n Lessen all de la composition de la second
FO	R OSE INTER	NAL USE		WR-20 WE	L RECORD & LOG (Ver	sion 06/08/2012)
FIL	E NUMBER	CP-	-1355	POD NUMBER / TRN NUMB	er 54945	$\mathcal{O}$
LO	CATION	EX	p1	215.33E.27.3	12	PAGE 2 OF 2

March 12, 2018 Page 11

## Attachment C – Laboratory Reports



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

February 19, 2018

Randall Hicks R.T. Hicks Consultants, LTD 901 Rio Grande Blvd. NW Suite F-142 Albuquerque, NM 87104 TEL: (505) 266-5004 FAX (505) 266-0745

RE: West of MP Jnct

OrderNo.: 1802042

Dear Randall Hicks:

Hall Environmental Analysis Laboratory received 3 sample(s) on 2/1/2018 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to <u>www.hallenvironmental.com</u> or the state specific web sites. In order to properly interpret your results, it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

andia

Andy Freeman Laboratory Manager 4901 Hawkins NE Albuquerque, NM 87109

**Analytical Report** 

Lab Order: 1802042

Hall Enviro	nmental Analysis	s Laborat	ory, Inc.		Date Reported: 2/19/2018	
CLIENT: Project:	R.T. Hicks Consultants, West of MP Jnct	LTD			Lab Order: 1802042	
Lab ID:	1802042-001			Collection	Date: 1/30/2018 3:19:00 PM	
Client Sample ID	<b>:</b> BH1 6"			Μ	atrix: SOIL	
Analyses		Result	PQL Qual	Units	DF Date Analyzed Batch	ID
EPA METHOD 30 Chloride	00.0: ANIONS	3300	150	mg/Kg	Analyst: <b>MR</b> 100 2/14/2018 4:54:58 AM 364	<b>A</b> 62
Lab ID:	1802042-002			Collection	Date: 1/30/2018 3:23:00 PM	
Client Sample ID	<b>:</b> BH1 12"			Μ	atrix: SOIL	
Analyses		Result	PQL Qual	Units	DF Date Analyzed Batch	ID
EPA METHOD 30	00.0: ANIONS				Analyst: MR	A
Chloride		3600	150	mg/Kg	100 2/14/2018 5:07:23 AM 364	62
Lab ID:	1802042-003		(	Collection	Date: 1/30/2018 3:27:00 PM	
Client Sample ID	<b>:</b> BH1 24"			Μ	atrix: SOIL	
Analyses		Result	PQL Qual	Units	DF Date Analyzed Batch	ID
EPA METHOD 30	00.0: ANIONS				Analyst: CJ:	S
Chloride		5100	300	mg/Kg	200 2/16/2018 5:27:47 PM 364	.95

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

Qualifiers:

\*

- Value exceeds Maximum Contaminant Level. D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quanitative Limit
- % Recovery outside of range due to dilution or matrix S
- Analyte detected in the associated Method Blank В
- Value above quantitation range Е
- J Analyte detected below quantitation limits Page 1 of 2
- Р Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

## QC SUMMARY REPORT Hall Environmental Analysis Laboratory, Inc.

Client: Project:	R.T. H West	Hicks Consultants, LTD of MP Jnct			
Sample ID	MB-36462	SampType: <b>mblk</b>	TestCode: EPA Method	300.0: Anions	
Client ID:	PBS	Batch ID: 36462	RunNo: 49047		
Prep Date:	2/12/2018	Analysis Date: 2/12/2018	SeqNo: 1579653	Units: <b>mg/Kg</b>	
Analyte		Result PQL SPK value	SPK Ref Val %REC LowLimit	HighLimit %RPD	RPDLimit Qual
Chloride		ND 1.5			
Sample ID	LCS-36462	SampType: Ics	TestCode: EPA Method	300.0: Anions	
Client ID:	LCSS	Batch ID: 36462	RunNo: 49047		
Prep Date:	2/12/2018	Analysis Date: 2/12/2018	SeqNo: 1579654	Units: mg/Kg	
Analyte		Result PQL SPK value	SPK Ref Val %REC LowLimit	HighLimit %RPD	RPDLimit Qual
Chloride		14 1.5 15.00	0 91.9 90	110	
Sample ID	MB-36495	SampType: mblk	TestCode: EPA Method	300.0: Anions	
Client ID:	PBS	Batch ID: 36495	RunNo: 49085		
Prep Date:	2/13/2018	Analysis Date: 2/13/2018	SeqNo: 1583564	Units: mg/Kg	
Analyte		Result PQL SPK value	SPK Ref Val %REC LowLimit	HighLimit %RPD	RPDLimit Qual
Chloride		ND 1.5			
Sample ID	LCS-36495	SampType: Ics	TestCode: EPA Method	300.0: Anions	
Client ID:	LCSS	Batch ID: 36495	RunNo: 49085		
Prep Date:	2/13/2018	Analysis Date: 2/13/2018	SeqNo: 1583565	Units: <b>mg/Kg</b>	
Analyte		Result PQL SPK value	SPK Ref Val %REC LowLimit	HighLimit %RPD	RPDLimit Qual

14 1.5 15.00 0 92.3 90 110

#### **Qualifiers:**

Chloride

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

Page 2 of 2

HALL ENVIRONMENTAL ANALYSIS LABORATORY	Hall Environmental Ada H Albuque FEL, 505-342-3975 FAX Website: www.hallenv	hsis Laboratory 201 Hawkins NL 2que: NM 87109 2 505-345-4107 vironmental.com	Sam	ple Log-In Check List
Client Name: RT HICKS	Work Order Number: 18	02042		RcptNo 1
Received By: Erin Melendrez 2/1	/2018 10:25:00 AM	V	LUL	7
Completed By. Erin Melendrez 2/1	/2018 1:35:55 PM	V	LUE	2
Labellal By DDS				
Chain of Custody				
1. Is Chain of Custody complete?	Ye	s 🗸	No 🗌	Not Present
2. How was the sample delivered?	Clin	ent		
Log In		12020	_	-
3. Was an attempt made to cool the samples?	Ye	s 🗹 _	No 🗌	
4. Were all samples received at a temperature of >0	0° C to 6.0°C Yes		No 🗌	
5. Sample(s) in proper container(s)?	Ye	i 🔽	No 🗌	
6. Sufficient sample volume for indicated test(s)?	Yes		No 🗌	
7. Are samples (except VOA and ONG) properly pre-	served? Yes		No 🗌	
8. Was preservative added to bottles?	Yes		No 🔽	NA 🗌
9. VOA vials have zero headspace?	Yes		No 🗌	No VOA Vials 🗹
O, Were any sample containers received broken?	Yes	0	NO X	# of preserved
<ol> <li>Does paperwork match bottle labels? (Note discrepancies on chain of custody)</li> </ol>	Yes	V	No 🗆	for pH: (<2 or >12 unless noted)
2 Are matrices correctly identified on Chain of Custo	dy? Yes	2	No.	Adjusted?
3, Is it clear what analyses were requested?	Yes		No	
<ol> <li>Were all holding times able to be met? (If no, notify customer for authorization.)</li> </ol>	Yes		No 🗌	Checked by:
Special Handling (if applicable)				
15. Was client notified of all discrepancies with this of	roer? Yes	а. Ш.	No 🗀	
Parson Nolified:	Date			
By Whom:	Via. 🗌 eñ	Mail D Phone	e 🗌 Fáx	In Person
Regarding: Client Instructions:				
16. Additional remarks:				
17. Cooler Information	Co Decision In acco	1 A.		

	XLI	ノフトビフ	11111		USDA -		L	F	4	<b>N</b> A	ž	SI'S	E I	R	0 B A	TOI	20
Mailing	g Addres	214	HCLS Consultieb	Project Name	7 drys	WEL			a strand	WWW.h	allenv	ironn	tental	Con	0.1400	5	7
				Project #:				Tel. 50	15-345	3795-6		anbni	ngue,	NINI 2 4	20170		
Phone	#										Analy	rsis F	keque	st			
email (	or Fax#:			Project Manag	jer. ,.		(	(O)		-		(*(	-	-	1	-	
CALOC XSta	Package		Level 4 (Full Validation)	Kau	sall An	cha	1208) s	HW / OE		ISMI	Includ	DS'*Od	bCB/s				
Accret	ditation	040		Sampler:			8MT	D/D	(1)	(17)		ON	2808	_			
I NE	LE			On Ice:	ZY es	ON0	. *	RC	811	t09	5	<sup>16</sup> O3	15	I VI	Q		_
	D (Type)			Sample Temp	erature: ) .8	-1.0(cf) =0.8	38.	5) (G	6 bo	g po	slete	N'I	epk	(V	7	-	
Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL NO. 18.02.042	TM + XƏTA	Here Adres	TPH (Metho	etca) a'HA9	M 8 AADA	0,4) anoinA	our goars	OA) 90020	M/MJ		
08/1	1579	Soil	BH 1 6 11	1 Grass		100-				-				-	Y		
-1	1523		BH#1 1211	5		200-	-			-			-	-	×		
-	1527	2	HA FHA	A		-003				-				-	X		
			BH I mus			)											
			as per RH										-				
								-		-			-	-			
										-				-			
														-			
			. 6														
Date	Time(	Reinquish	addy / 1/2	Received by		Date Time	Remar	ks.	3					-			
51/1	Scol	1/1	mr tall 11	NTO		2/18 BV12											
Date.	Timer	Refinquish	/ Jan Ad pa	Received by:		Date Time	_										



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

February 15, 2018

Randall Hicks R.T. Hicks Consultants, LTD 901 Rio Grande Blvd. NW Suite F-142 Albuquerque, NM 87104 TEL: (505) 266-5004 FAX (505) 266-0745

RE: 32 26 50 / 103 33 50

OrderNo.: 1802026

Dear Randall Hicks:

Hall Environmental Analysis Laboratory received 5 sample(s) on 2/1/2018 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to <u>www.hallenvironmental.com</u> or the state specific web sites. In order to properly interpret your results, it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

andia

Andy Freeman Laboratory Manager 4901 Hawkins NE Albuquerque, NM 87109

**Analytical Report** 

Lab Order: 1802026

Hall Enviro	nmental Analys	is Laborat	ory, Inc.		Date Reported: 2/15/2018	
CLIENT: Project:	R.T. Hicks Consultant: 32 26 50 / 103 33 50	s, LTD			Lab Order: 1802026	
Lab ID: Client Sample ID	1802026-001 : BH2 6"			Collection Da Mat	ate: 1/30/2018 2:51:00 PM rix: SOIL	
Analyses		Result	PQL Qual	Units	DF Date Analyzed Batch	ID
EPA METHOD 30 Chloride	00.0: ANIONS	5200	300	mg/Kg	Analyst: <b>MR</b> 200 2/14/2018 2:26:03 AM 364	162
Lab ID: Client Sample ID	1802026-002 : BH2 12"		,	Collection Da Mat	ate: 1/30/2018 2:57:00 PM rix: SOIL	
Analyses		Result	PQL Qual	Units	DF Date Analyzed Batch	ID
EPA METHOD 30 Chloride	00.0: ANIONS	5400	300	mg/Kg	Analyst: <b>MR</b> 200 2/14/2018 2:38:28 AM 364	162
Lab ID: Client Sample ID	1802026-003 : BH2 24"			Collection Da Mat	ate: 1/30/2018 3:02:00 PM rix: SOIL	
Analyses		Result	PQL Qual	Units	DF Date Analyzed Batch	ID
EPA METHOD 30 Chloride	00.0: ANIONS	5500	300	mg/Kg	Analyst: <b>MR</b> 200 2/14/2018 2:50:52 AM 364	162
Lab ID: Client Sample ID	1802026-004 : BH1 6"			Collection Da Mat	ate: 1/30/2018 2:32:00 PM rix: SOIL	
Analyses		Result	PQL Qual	Units	DF Date Analyzed Batch	ID
EPA METHOD 30 Chloride	00.0: ANIONS	840	30	mg/Kg	Analyst: <b>MR</b> 20 2/12/2018 1:41:21 PM  364	162
Lab ID: Client Sample ID	1802026-005 : BH1 12"			Collection Da Mat	ate: 1/30/2018 2:37:00 PM rix: SOIL	
Analyses		Result	PQL Qual	Units	DF Date Analyzed Batch	ID
EPA METHOD 30 Chloride	00.0: ANIONS	2900	75	mg/Kg	Analyst: <b>MR</b> 50 2/14/2018 3:03:17 AM 364	8 <b>A</b> 162

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

- Qualifiers:
- \* Value exceeds Maximum Contaminant Level. Sample Diluted Due to Matrix
- D
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quanitative Limit
- % Recovery outside of range due to dilution or matrix S
- Analyte detected in the associated Method Blank В
- Value above quantitation range Е
- J Analyte detected below quantitation limits Page 1 of 2
- Р Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

## QC SUMMARY REPORT Hall Environmental Analysis Laboratory, Inc.

Client: Project:	R.T. H 32 26	licks Consultant 50 / 103 33 50	s, LT	٢D							
Sample ID	MB-36462	SampType	e: <b>m</b> l	blk	Tes	tCode: El	PA Method	300.0: Anion	S		
Client ID:	PBS	Batch ID	): <b>36</b>	462	F	RunNo: 4	9047				
Prep Date:	2/12/2018	Analysis Date	: <b>2</b>	/12/2018	S	SeqNo: 1	579653	Units: <b>mg/H</b>	ζg		
Analyte		Result F	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride		ND	1.5								
Sample ID	LCS-36462	SampType	e: Ice	6	Tes	tCode: El	PA Method	300.0: Anion	S		
Client ID:	LCSS	Batch ID	: <b>36</b>	462	F	RunNo: 4	9047				
Prep Date:	2/12/2018	Analysis Date	: <b>2</b>	/12/2018	5	SeqNo: 1	579654	Units: <b>mg/k</b>	٢g		
Analyte		Result F	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride		14	1.5	15.00	0	91.9	90	110			

#### Qualifiers:

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

Page 2 of 2

WO#: **1802026** *15-Feb-18* 

Client Name: RT HICKS	Work Order Number.	180	2026			ReptNo: T	
Received By Erin Melendrez	2/1/2018 10:09:00 AM			Vh	U.T.		
Completed By: Erin Melendrez	2/1/2018 11:10:09 AM			they	vit.	7	
Lubelad Bu Sto 07/1	alty.						
Chain of Custody	441						
1 Is Chain of Custody complete?		Ves	~	No	П	Not Present	
2. How was the sample delivered?		Clier	<u>1</u>				
Log In							
3. Was an attempt made to cool the samples?		Yes	•	No		NA 🗌	
4. Were all samples received at a temperature	of >0° C to 5.0°C	Yes		No		NA C	
5. Sample(s) in proper container(s)?		Yes	V	No			
6. Sufficient sample volume for indicated test(s	)?	Yes	V	No			
7. Are samples (except VOA and ONG) propert	y preserved?	Yes	<b>v</b>	No			
8. Was preservative added to bottles?		Yes		No	~	NA 🗌	
9. VOA vials have zero headspace?		Yes	لك	No	1	No VOA Vials 🗹	
10. Were any sample containers received broke	n?	Yes	<u>_</u>	No	•	# of presenced	-
11. Does paperwork match bottle tabels?		Yes	×	No	п	bottles checked	
(Note discrepancies on chain of custody)		-	-		ä I	(<2 or >12 unless no Adjusted?	led
12. Are matrices correctly identified on Chain of 12. Is it clear what applyings were requested?	Custody?	Yes		ND	H	/ lighter -	-
14. Were all holding times able to be met? (If no, notify customer for authorization.)		Yes		No		Checked by:	
Special Handling (if applicable)							
15 Was client notified of all discrepancies with t	his order?	Yes		No	=	-NA -	
Person Notified:	Date:						
By Whom:	Via:	eMa	il 🗌 Pi	hone 🗌	Fax	In Person	
Regarding:							
Client Instructions:							
16. Additional remarks							

Relation II O II



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

February 15, 2018

Randall Hicks R.T. Hicks Consultants, LTD 901 Rio Grande Blvd. NW Suite F-142 Albuquerque, NM 87104 TEL: (505) 266-5004 FAX (505) 266-0745

RE: Battle 34 Fed 4H Jnct

OrderNo.: 1802028

Dear Randall Hicks:

Hall Environmental Analysis Laboratory received 9 sample(s) on 2/1/2018 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to <u>www.hallenvironmental.com</u> or the state specific web sites. In order to properly interpret your results, it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

andia

Andy Freeman Laboratory Manager 4901 Hawkins NE Albuquerque, NM 87109

**Analytical Report** 

Lab Order: 1802028

Hall Enviro	nmental Analys	sis Laborat	ory, Inc.		Date Reported: 2/15/2018
CLIENT: Project:	R.T. Hicks Consultant Battle 34 Fed 4H Jnct	ts, LTD			Lab Order: 1802028
Lab ID:	1802028-001			Collection D	Date: 1/30/2018 1:09:00 PM
Client Sample ID	: BH 6"			Ma	trix: SOIL
Analyses		Result	PQL Qual	Units	DF Date Analyzed Batch ID
EPA METHOD 30	00.0: ANIONS				Analyst: MRA
Chloride		3100	150	mg/Kg	100 2/14/2018 3:40:31 AM 36462
Lab ID:	1802028-002			Collection D	Date: 1/30/2018 1:11:00 PM
Client Sample ID	<b>:</b> BH 12"			Ma	trix: SOIL
Analyses		Result	PQL Qual	l Units	DF Date Analyzed Batch ID
EPA METHOD 30	00.0: ANIONS	05	20		Analyst: MRA
Chloride		95	30	mg/Kg	20 2/12/2018 2:18:35 PM 36462
Lab ID:	1802028-003			Collection D	ate: 1/30/2018 1:15:00 PM
Client Sample ID	<b>:</b> BH 24"			Ma	trix: SOIL
Analyses		Result	PQL Qual	Units	DF Date Analyzed Batch ID
EPA METHOD 30	00.0: ANIONS				Analyst: MRA
Chloride		220	30	mg/Kg	20 2/12/2018 2:30:59 PM 36462
Lab ID:	1802028-004			Collection D	Date: 1/30/2018 1:56:00 PM
Client Sample ID	<b>:</b> BH3 12"			Ma	trix: SOIL
Analyses		Result	PQL Qual	Units	DF Date Analyzed Batch ID
EPA METHOD 30	00.0: ANIONS				Analyst: MRA
Chloride		1300	75	mg/Kg	50 2/14/2018 3:52:55 AM 36462
Lab ID:	1802028-005			Collection D	Date: 1/30/2018 1:51:00 PM
Client Sample ID	: BH3 6"			Ma	trix: SOIL
Analyses		Result	PQL Qual	Units	DF Date Analyzed Batch ID
EPA METHOD 30	00.0: ANIONS				Analyst: MRA
Chloride		4100	150	mg/Kg	100 2/14/2018 4:05:20 AM 36462

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

- Qualifiers:
- \* Value exceeds Maximum Contaminant Level. D Sample Diluted Due to Matrix
- Н Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quanitative Limit
- % Recovery outside of range due to dilution or matrix S
- Analyte detected in the associated Method Blank В
- Value above quantitation range Е
- J Analyte detected below quantitation limits Page 1 of 3
- Р Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

**Analytical Report** 

Lab Order: 1802028

	innentai Anaiysis		ory, me.		Date Reported: 2/15/2018
CLIENT: Project:	R.T. Hicks Consultants, Battle 34 Fed 4H Jnct	LTD			Lab Order: 1802028
Lab ID:	1802028-006		(	Collection	<b>Date:</b> 1/30/2018 1:35:00 PM
Client Sample ID	<b>:</b> BH2 12"			Ma	atrix: SOIL
Analyses		Result	PQL Qual	Units	DF Date Analyzed Batch ID
EPA METHOD 30	00.0: ANIONS				Analyst: MRA
Chloride		2100	75	mg/Kg	50 2/14/2018 4:17:45 AM 36462
Lab ID:	1802028-007			Collection 2	Date: 1/30/2018 1:32:00 PM
Client Sample ID	<b>:</b> BH2 6"			Ma	atrix: SOIL
Analyses		Result	PQL Qual	Units	DF Date Analyzed Batch ID
EPA METHOD 30	00.0: ANIONS				Analyst: MRA
Chloride		6800	300	mg/Kg	200 2/14/2018 4:30:09 AM 36462
Lab ID:	1802028-008			Collection 2	Date: 1/30/2018 1:35:00 PM
Client Sample ID	<b>:</b> BH2 16"			Ma	atrix: SOIL
Analyses		Result	PQL Qual	Units	DF Date Analyzed Batch ID
EPA METHOD 30	00.0: ANIONS				Analyst: MRA
Chloride		1900	75	mg/Kg	50 2/14/2018 4:42:33 AM 36462
Lab ID:	1802028-009			Collection	Date: 1/30/2018 2:02:00 PM
Client Sample ID	<b>:</b> BH3 24"			Ma	atrix: SOIL
Analyses		Result	PQL Qual	Units	DF Date Analyzed Batch ID
EPA METHOD 30	00.0: ANIONS				Analyst: MRA
Chloride		1100	30	mg/Kg	20 2/12/2018 4:10:16 PM 36462

Hall Environmental Analysis Laboratory Inc

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

Qualifiers:

- \* Value exceeds Maximum Contaminant Level. D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quanitative Limit
- % Recovery outside of range due to dilution or matrix S
- Analyte detected in the associated Method Blank В
- Value above quantitation range Е
- J Analyte detected below quantitation limits Page 2 of 3
- Р Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

## QC SUMMARY REPORT Hall Environmental Analysis Laboratory, Inc.

Client: Project:	R.T. H Battle 3	icks Consultants, LTD 34 Fed 4H Jnct			
Sample ID	MB-36462	SampType: mblk	TestCode: EPA Method	300.0: Anions	
Client ID:	PBS	Batch ID: 36462	RunNo: 49047		
Prep Date:	2/12/2018	Analysis Date: 2/12/2018	SeqNo: 1579653	Units: mg/Kg	
Analyte		Result PQL SPK value	SPK Ref Val %REC LowLimit	HighLimit %RPD	RPDLimit Qual
Chloride		ND 1.5			
Sample ID	LCS-36462	SampType: Ics	TestCode: EPA Method	300.0: Anions	
Client ID:	LCSS	Batch ID: 36462	RunNo: 49047		
Prep Date:	2/12/2018	Analysis Date: 2/12/2018	SeqNo: 1579654	Units: mg/Kg	
Analyte		Result PQL SPK value	SPK Ref Val %REC LowLimit	HighLimit %RPD	RPDLimit Qual
Chloride		14 1.5 15.00	0 91.9 90	110	

#### **Qualifiers:**

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

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WO#: **1802028** *15-Feb-18* 

HALL ENVIRONMENTAL ANALYSIS LABORATORY	Hall Environmental (11h) TEL: 505-345-3975 Website: www.ha	Analy 191 Inquerg FAX: theavi	sts La 11 Han (ne, N) 505-3 renand	boratory vkiny NT M 87109 45-4107 nual.com	Sar	mple Log-In Check List
Client Name. RT HICKS	Work Order Number:	180	2028			ReptNo: 1
Received By: Erin Melendrez	2/1/2018 10:19:00 AM			K	NA	5
Completed By Erin Melendroz Reviewed By DDS	2/1/2018 11:29:07 AM 2/1/18			U	ILA	
Labeled 154 stee 02	01110					
Chain of Custody						
1. Is Chain of Custody complete?		Yes	V	N	0	Not Present
<ol><li>How was the sample delivered?</li></ol>		<u>Clier</u>	<u>nt</u>			
Log In 3. Was an attempt made to cool the samples?		Yes		N	<b>b</b>	NA $\square$
4. Were all samples received at a temperature of	if >0° C to 6.0°C	Yes	~	N	<b>b</b> []	
5. Sample(s) in proper container(s)?		Yes		N		
<ol><li>Sufficient sample volume for indicated test(s)<sup>4</sup></li></ol>	7	Yes	V	No		
7. Are samples (except VOA and ONG) properly	preserved?	Yes	1	No		
8. Was preservative added to bottles?		Yes		No	~	NA 🗆
9. VOA vials have zero headspace?		Yes		No		No VOA Vials 🗹
0. Were any sample containers received broken	?	Yes		N		# of preserved
<ol> <li>Does paperwork match bottle labels? (Note discrepancies on chain of custody)</li> </ol>		Yes	Y	No		for pH: (<2 or >12 unless noted
2, Are matrices correctly identified on Chain of C	ustody?	Yes	~	No		Adjusted?
3, is it clear what analyses were requested?		Yes	~	No		
<ol> <li>Were all holding times able to be met? (If no, notify customer for authorization.)</li> </ol>		Yes	~	No	Ē	Checked by:
Special Handling (if applicable)						
15. Was client notified of all discrepancies with th	is order?	Yes		N		NA V
Person Notified:	Date:					
By Whom:	Via:	eMa	11 E	Phone	Fax	C in Person
Regarding:						
Client Instructions:					_	
16. Additional remarks:						
17. Cooler Information	Ulphani   Scottata   D	onl D	the state	Circu	Du	ĩ
t 0.8 Good Net	Present	eal De	HC.	Signed	ВY	ł

Client:	hain-	of-CL	E FRAC	Turn-Around	Time:						H			E	NV	IF	RO	NN	1		L	
Mailing	R Address	TH	eks Consult	Project Nam BATTLE	ei 34 F6	D 4H JNCT		2	49	01 Ha	wkir	www ns N	hal	lenv Alb	ironi	men	tal.co	om M 87	109	10	ĸī	
Phone	# <	75-2	38-9915	Project #:				_	Ťe	1.50	5-34	5-39	75 A	F	ax	505- Reg	-345	4107				
email o QA/QC LXStar	r Fax#: Package: Idard	Ræ	Level 4 (Full Validation)	Rroject Mana	ager. Mailtí	la		's (8021)	(Gas only)	RO / MRO)			SIMS)		(PO4.SO4)	2 PCB's						
Accred	itation AP	🗆 Othe	ir -	Sampler:	DV as	I No	_	TMB	TPH	Id/o	8.1)	4.1)	3270		NO2	1 8082		2				N)
	(Type)			Sample Tem	perature: \_	3-1.D(CF)	=0.8	BE +	BE +	(GR	0d 41	od 50	0 or 8	tals	ON B	ides	3	-VOA	ide		1	(V of
Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL NO		BTEX + MT	BTEX + MT	TPH 8015B	TPH (Metho	EDB (Metho	PAH's (831	RCRA 8 ME	Anions (F,C	8081 Pestic	8260B (VO)	8270 (Semi	Chlor			Air Bubbles
130	1309	Soil	134 6"	I GLASS		-001													X			Ĩ
1	1311	1	MABH 12"	1/		-002									-				X			
1	1315		BH 24"			-003													$\boldsymbol{\lambda}$	12		
1	1356		BH3 12"			-004						1						-	X			
_	1351	1	BH 3 6"			-005	_												×			
1	1335	(	BH2 12"	1		-000													X		1	
1	1332	1	BH2 6"			-007		-											X			
_	1335	1	BH2 16"		-	-008									-				X			
<u></u>	1402	4	BH 3 24"	V		-004			_										×			-
			2			2																
Date 2/( Date	Timo: 10/19 Time	Relinquishe	ad by:	Received by Reneived by	2 2	Date Time	9	Ren	iarks													

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

Attachment D Field Maps from Merchant Livestock

March 12, 2018 Page 11

### West of Merchant Pit Produced Water Transfer Line Release



Trench 1 is at the source of the release and we expect the deepest sample at 8-10 feet or at hard caliche. Trench 2 is in a pooling area in the pasture near the terminus of the spill footprint and we expect the deepest sample at 6-8 feet. The area of the footprint is about 250 square yards. March 12, 2018 Page 11

## 36 22 50 and Battle Produced Water Transfer Line Releases

North is to the right.



The Battle Release consists of three separate incidents and the footprint traced is about 450 square yards. Trench 1 will test the depth of impact at a pooling site next to the road and Trench 2 is a pooling location associated with all three incidents. A third sampling trench location will be selected in the field.

The 32 26 50 Release is a single release incident with an area of flow covering about 500 yards. Trench 1 is at the location of the release at the top of a sand dune. Trench 2 is in a pooling area and Trench 3 is at the terminus of the release just off the road. A fourth sampling trench may collect samples north of Trench 2.