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DELINEATION WORKPLAN

COG – BLUE JAY FEDERAL #001H (Leak Date: 7/1/17)

RP # 1RP-4758 API # 30-025-42338

This delineation workplan and remediation proposal addresses the release associated with RP # 1RP-4758.

The following information includes:

- 1. Scaled digital site map with spill area demarcated and leak point identified along with sample point locations and areas of remediation at appropriate depths.
- 2. GPS information for sample points and sample methodology
- 3. Depth to groundwater information (i.e., pdf of OSE search results and/or copy of Chevron groundwater trend map).
- 4. Laboratory analysis results summary table and original laboratory analysis reports
- 5. A copy of the initial C-141
- 6. Potentially other pertinent information as necessary for site specific purposes.

Based on the information included in this package and the NMOCD guidelines, the following remediation is proposed:

COG will excavate the spill area as depicted on the following site diagram. The leak area near SP1 (yellow shade on diagram) will be excavated to a depth of 4 feet. The leak area near SP2 (blue shade on diagram) will be excavated to a depth of 1 foot.

The entire site will then be backfilled with clean soil and revegetated (if warranted) to the standards of the appropriate regulatory agency or private surface owner.

All excavated materials will be disposed of at an NMOCD-approved disposal facility.

APPROVED By Olivia Yu at 12:02 pm, Jul 17, 2018 NMOCD approves of the delineation completed for 1RP-4758 and proposed remediation with these conditions: 1) Bottom (SP2 area) and sidewall samples are required, including at least 1 at the border between different depths of excavation. 2) Dated photo documentation. 3) Scaled map with confirmation sample locations.



COG, Blue Jay Federal #001H

Sample points

SP1, N 32.56628 W-103.49562

SP2, N 32.56631 W-103.49573

NORTH, N 32.56631 W-103.49567

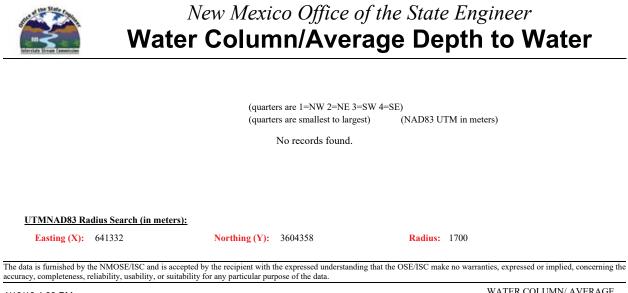
SOUTH, N 32.56626 W-103.49571

EAST, N 32.56628 W-103.49558

WEST, N 32.56633 W-103.49576

COG, Blue Jay Federal #001H U/L O, Section 18, T20S, R35E Groundwater: <50'





4/13/18 4:33 PM

WATER COLUMN/ AVERAGE DEPTH TO WATER

| Page 1 of | 1 |
|-----------|---|
| | |

| | | Dub | lia Land Sum | vov Svetom (PLS | (2) | | | | | | |
|---|---------------------------------------|---------------|---------------|----------------------------------|-------------|----------------|--|--|--|--|--|
| ۲ | Q64: 🗸 | | | vey System (PLS Sec: 18 ∨ Tws | - | Rng: 35E 🗸 | | | | | |
| | State Plane Coordinate System - NAD27 | | | | | | | | | | |
| 0 | X: 0 f | t Y: 0 | ft | Zone: | | \checkmark | | | | | |
| | State Plane Coordinate System - NAD83 | | | | | | | | | | |
| 0 | X: 0 f | t Y: 0 | ft | Zone: | | \checkmark | | | | | |
| | Degrees/Minutes/Seconds | | | | | | | | | | |
| 0 | Longitude (X): | Deg | rees: 0 ° | Minutes: 0 | • | Seconds: 0 " | | | | | |
| | Latitude (Y): | Deg | jrees: 0 ° | Minutes: 0 | | Seconds: 0 " | | | | | |
| | | | UTM · | NAD27 | | | | | | | |
| 0 | Easting (X |): 0 V | mtrs | Northing (Y): | 0 | mtrs Zone: | | | | | |
| | | | S | JBMIT | | | | | | | |
| | All Con | version Res | ults are disp | layed as <u>NAD 1</u> | 983 UTM | <u>Zone 13</u> | | | | | |
| | Easting (X): | 641332.0 | mtrs | Northing (Y): | 3604358.0 | mtrs | | | | | |
| | ~~ | Please keep s | creen open to | copy UTM values | for Reports | 5. ~~ | | | | | |

Laboratory Analytical Results Summary Blue Jay Federal #001H

| | | Sample ID | SP1 @ SURFACE | SP1 @ 1' | SP1 @ 2' | SP1 @ 3' | SP1 @ 4' | SP1 @ 5' | SP1 @ 10' | SP1 @ 11' | SP1 @ 16' |
|---------------|------------|-----------|------------------|----------|----------|----------|----------|----------|-----------|-----------|-----------|
| Analyte | Method | Date | 4/30/18 | 4/30/18 | 4/30/18 | 4/30/18 | 4/30/18 | 4/30/18 | 4/30/18 | 5/18/18 | 5/18/18 |
| | | | mg/kg | mg/kg | mg/kg | mg/kg | mg/kg | mg/kg | mg/kg | mg/kg | mg/kg |
| Benzene | BTEX 8021B | | <0.050 | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Toluene | BTEX 8021B | | <0.050 | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Ethylbenzene | BTEX 8021B | | <0.050 | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Total Xylenes | BTEX 8021B | | <0.150 | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Total BTEX | BTEX 8021B | | <0.300 | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Chloride | SM4500CI-B | | 640 | 1870 | 3200 | 5200 | 2640 | 1060 | 992 | 304 | 384 |
| Chloride | EPA300.0 | | n/a | n/a | n/a | n/a | n/a | n/a | n/a | 374 | 399 |
| GRO | TPH 8015M | | <10.0 | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| DRO | TPH 8015M | | 70.2 | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| EXT DRO | TPH 8015M | | 46.3 | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |

| | | Sample ID | SP2 @ SURFACE | SP2 @ 1' | SP2 @ 6' |
|---------------|------------|-----------|------------------|----------|----------|
| Analyte | Method | Date | 4/30/18 | 4/30/18 | 4/30/18 |
| | | | mg/kg | mg/kg | mg/kg |
| Benzene | BTEX 8021B | | <0.050 | n/a | n/a |
| Toluene | BTEX 8021B | | <0.050 | n/a | n/a |
| Ethylbenzene | BTEX 8021B | | <0.050 | n/a | n/a |
| Total Xylenes | BTEX 8021B | | <0.150 | n/a | n/a |
| Total BTEX | BTEX 8021B | | <0.300 | n/a | n/a |
| Chloride | SM4500CI-B | | 3040 | 128 | 192 |
| GRO | TPH 8015M | | <10.0 | n/a | n/a |
| DRO | TPH 8015M | | <10.0 | n/a | n/a |
| EXT DRO | TPH 8015M | | <10.0 | n/a | n/a |

| | | | NORTH @ | EAST @ | WEST @ | SOUTH @ |
|---------------|------------|-----------|---------|---------|---------|---------|
| Cardinal | | Sample ID | SURFACE | SURFACE | SURFACE | SURFACE |
| Analyte | Method | Date | 4/30/18 | 4/30/18 | 4/30/18 | 4/30/18 |
| | | | mg/kg | mg/kg | mg/kg | mg/kg |
| Benzene | BTEX 8021B | | <0.050 | <0.050 | <0.050 | <0.050 |
| Toluene | BTEX 8021B | | <0.050 | <0.050 | <0.050 | <0.050 |
| Ethylbenzene | BTEX 8021B | | <0.050 | <0.050 | <0.050 | <0.050 |
| Total Xylenes | BTEX 8021B | | <0.150 | <0.150 | <0.150 | <0.150 |
| Total BTEX | BTEX 8021B | | <0.300 | <0.300 | <0.300 | <0.300 |
| Chloride | SM4500CI-B | | 128 | 240 | 320 | 128 |
| GRO | TPH 8015M | | <10.0 | <10.0 | <10.0 | <10.0 |
| DRO | TPH 8015M | | <10.0 | <10.0 | <10.0 | <10.0 |
| EXT DRO | TPH 8015M | | <10.0 | <10.0 | <10.0 | <10.0 |



May 08, 2018

Cliff Brunson BBC International, Inc. P.O. Box 805 Hobbs, NM 88241

RE: BLUE JAY FERDERAL #001H

Enclosed are the results of analyses for samples received by the laboratory on 05/01/18 15:20.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-17-10. 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.

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,

Celecz D. Keine

Celey D. Keene Lab Director/Quality Manager



BBC International, Inc. Cliff Brunson P.O. Box 805 Hobbs NM, 88241 Fax To: (575) 397-0397

| Received: | 05/01/2018 | Sampling Date: | 04/30/2018 |
|-------------------|-------------------------|---------------------|---------------|
| Reported: | 05/08/2018 | Sampling Type: | Soil |
| Project Name: | BLUE JAY FERDERAL #001H | Sampling Condition: | Cool & Intact |
| Project Number: | NONE GIVEN | Sample Received By: | Jodi Henson |
| Project Location: | COG - LEA CO NM | | |

Sample ID: SP 1 @ SURFACE (H801205-01)

| BTEX 8021B | mg/ | ′kg | Analyze | d By: MS | | | | | |
|--------------------------------------|--------|-----------------|-----------------|-----------------|------|------------|---------------|-------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Benzene* | <0.050 | 0.050 | 05/03/2018 | ND | 1.77 | 88.3 | 2.00 | 3.22 | |
| Toluene* | <0.050 | 0.050 | 05/03/2018 | ND | 1.90 | 94.8 | 2.00 | 1.67 | |
| Ethylbenzene* | <0.050 | 0.050 | 05/03/2018 | ND | 1.91 | 95.4 | 2.00 | 1.98 | |
| Total Xylenes* | <0.150 | 0.150 | 05/03/2018 | ND | 5.87 | 97.8 | 6.00 | 2.13 | |
| Total BTEX | <0.300 | 0.300 | 05/03/2018 | ND | | | | | |
| Surrogate: 4-Bromofluorobenzene (PID | 101 9 | % 72-148 | | | | | | | |
| Chloride, SM4500Cl-B | mg/ | ′kg | Analyzed By: AC | | | | | | |
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Chloride | 640 | 16.0 | 05/03/2018 | ND | 432 | 108 | 400 | 3.77 | |
| TPH 8015M | mg/ | ′kg | Analyze | Analyzed By: MS | | | | | |
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| GRO C6-C10* | <10.0 | 10.0 | 05/02/2018 | ND | 206 | 103 | 200 | 0.922 | |
| DRO >C10-C28* | 70.2 | 10.0 | 05/02/2018 | ND | 206 | 103 | 200 | 3.25 | |
| EXT DRO >C28-C36 | 46.3 | 10.0 | 05/02/2018 | ND | | | | | |
| Surrogate: 1-Chlorooctane | 93.6 | % 41-142 | | | | | | | |
| Surrogate: 1-Chlorooctadecane | 102 9 | % 37.6-14 | 7 | | | | | | |

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



BBC International, Inc. Cliff Brunson P.O. Box 805 Hobbs NM, 88241 Fax To: (575) 397-0397

| Received: | 05/01/2018 | Sampling Date: | 04/30/2018 |
|-------------------|-------------------------|---------------------|---------------|
| Reported: | 05/08/2018 | Sampling Type: | Soil |
| Project Name: | BLUE JAY FERDERAL #001H | Sampling Condition: | Cool & Intact |
| Project Number: | NONE GIVEN | Sample Received By: | Jodi Henson |
| Project Location: | COG - LEA CO NM | | |

Sample ID: SP 1 @ 1 (H801205-02)

| Chloride, SM4500Cl-B | mg, | /kg | Analyze | d By: AC | | | | | |
|----------------------|--------|-----------------|------------|--------------|-----|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Chloride | 1870 | 16.0 | 05/03/2018 | ND | 432 | 108 | 400 | 3.77 | |

Sample ID: SP 1 @ 2 (H801205-03)

| Chloride, SM4500Cl-B | mg | /kg | Analyzed By: AC | | | | | | |
|----------------------|--------|-----------------|-----------------|--------------|-----|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Chloride | 3200 | 16.0 | 05/03/2018 | ND | 432 | 108 | 400 | 3.77 | |

Sample ID: SP 1 @ 3 (H801205-04)

| Chloride, SM4500Cl-B mg/kg | | Analyzed By: AC | | | | | | | |
|----------------------------|--------|-----------------|------------|--------------|-----|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Chloride | 5200 | 16.0 | 05/03/2018 | ND | 432 | 108 | 400 | 3.77 | |

Sample ID: SP 1 @ 4 (H801205-05)

| Chloride, SM4500Cl-B | mg, | /kg | Analyze | d By: AC | | | | | |
|----------------------|--------|-----------------|------------|--------------|-----|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Chloride | 2640 | 16.0 | 05/03/2018 | ND | 432 | 108 | 400 | 3.77 | |

Sample ID: SP 1 @ 5 (H801205-06)

| Chloride, SM4500Cl-B | mg, | /kg | Analyze | d By: AC | | | | | |
|----------------------|--------|-----------------|------------|--------------|-----|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Chloride | 1060 | 16.0 | 05/03/2018 | ND | 432 | 108 | 400 | 3.77 | |

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



BBC International, Inc. Cliff Brunson P.O. Box 805 Hobbs NM, 88241 Fax To: (575) 397-0397

| Received: | 05/01/2018 | Sampling Date: | 04/30/2018 |
|-------------------|-------------------------|---------------------|---------------|
| Reported: | 05/08/2018 | Sampling Type: | Soil |
| Project Name: | BLUE JAY FERDERAL #001H | Sampling Condition: | Cool & Intact |
| Project Number: | NONE GIVEN | Sample Received By: | Jodi Henson |
| Project Location: | COG - LEA CO NM | | |

Sample ID: SP 1 @ 10 (H801205-07)

| Chloride, SM4500Cl-B | mg | /kg | Analyze | d By: AC | | | | | |
|----------------------|--------|-----------------|------------|--------------|-----|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Chloride | 992 | 16.0 | 05/03/2018 | ND | 432 | 108 | 400 | 3.77 | |

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Celey D. Keene, Lab Director/Quality Manager



BBC International, Inc. Cliff Brunson P.O. Box 805 Hobbs NM, 88241 Fax To: (575) 397-0397

| Received: | 05/01/2018 | Sampling Date: | 04/30/2018 |
|-------------------|-------------------------|---------------------|---------------|
| Reported: | 05/08/2018 | Sampling Type: | Soil |
| Project Name: | BLUE JAY FERDERAL #001H | Sampling Condition: | Cool & Intact |
| Project Number: | NONE GIVEN | Sample Received By: | Jodi Henson |
| Project Location: | COG - LEA CO NM | | |

Sample ID: SP 2 @ SURFACE (H801205-08)

| BTEX 8021B | mg/ | kg | Analyze | d By: MS | | | | | |
|--------------------------------------|--------|-----------------|------------|--------------|------|------------|---------------|-------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Benzene* | <0.050 | 0.050 | 05/03/2018 | ND | 1.77 | 88.3 | 2.00 | 3.22 | |
| Toluene* | <0.050 | 0.050 | 05/03/2018 | ND | 1.90 | 94.8 | 2.00 | 1.67 | |
| Ethylbenzene* | <0.050 | 0.050 | 05/03/2018 | ND | 1.91 | 95.4 | 2.00 | 1.98 | |
| Total Xylenes* | <0.150 | 0.150 | 05/03/2018 | ND | 5.87 | 97.8 | 6.00 | 2.13 | |
| Total BTEX | <0.300 | 0.300 | 05/03/2018 | ND | | | | | |
| Surrogate: 4-Bromofluorobenzene (PID | 101 9 | 6 72-148 | | | | | | | |
| Chloride, SM4500Cl-B | mg/ | kg | Analyze | d By: AC | | | | | |
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Chloride | 3040 | 16.0 | 05/03/2018 | ND | 432 | 108 | 400 | 3.77 | |
| 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 | 05/02/2018 | ND | 206 | 103 | 200 | 0.922 | |
| DRO >C10-C28* | <10.0 | 10.0 | 05/02/2018 | ND | 206 | 103 | 200 | 3.25 | |
| EXT DRO >C28-C36 | <10.0 | 10.0 | 05/02/2018 | ND | | | | | |
| Surrogate: 1-Chlorooctane | 96.1 | % 41-142 | | | | | | | |
| Surrogate: 1-Chlorooctadecane | 103 % | 6 37.6-14 | 7 | | | | | | |

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Celey D. Keene, Lab Director/Quality Manager



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| Received: | 05/01/2018 | Sampling Date: | 04/30/2018 |
|-------------------|-------------------------|---------------------|---------------|
| Reported: | 05/08/2018 | Sampling Type: | Soil |
| Project Name: | BLUE JAY FERDERAL #001H | Sampling Condition: | Cool & Intact |
| Project Number: | NONE GIVEN | Sample Received By: | Jodi Henson |
| Project Location: | COG - LEA CO NM | | |

Sample ID: SP 2 @ 1 (H801205-09)

| Chloride, SM4500Cl-B | mg | /kg | Analyze | d By: AC | | | | | |
|----------------------|--------|-----------------|------------|--------------|-----|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Chloride | 128 | 16.0 | 05/03/2018 | ND | 448 | 112 | 400 | 0.00 | |

Sample ID: SP 2 @ 6 (H801205-10)

| Chloride, SM4500Cl-B | mg | /kg | Analyze | d By: AC | | | | | |
|----------------------|--------|-----------------|------------|--------------|-----|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Chloride | 192 | 16.0 | 05/03/2018 | ND | 448 | 112 | 400 | 0.00 | |

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| Received: | 05/01/2018 | Sampling Date: | 04/30/2018 |
|-------------------|-------------------------|---------------------|---------------|
| Reported: | 05/08/2018 | Sampling Type: | Soil |
| Project Name: | BLUE JAY FERDERAL #001H | Sampling Condition: | Cool & Intact |
| Project Number: | NONE GIVEN | Sample Received By: | Jodi Henson |
| Project Location: | COG - LEA CO NM | | |

Sample ID: N @ SURFACE (H801205-11)

| BTEX 8021B | mg/ | kg | Analyze | d By: MS | | | | | |
|--------------------------------------|--------|-----------------|------------|--------------|------|------------|---------------|-------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Benzene* | <0.050 | 0.050 | 05/03/2018 | ND | 1.77 | 88.3 | 2.00 | 3.22 | |
| Toluene* | <0.050 | 0.050 | 05/03/2018 | ND | 1.90 | 94.8 | 2.00 | 1.67 | |
| Ethylbenzene* | <0.050 | 0.050 | 05/03/2018 | ND | 1.91 | 95.4 | 2.00 | 1.98 | |
| Total Xylenes* | <0.150 | 0.150 | 05/03/2018 | ND | 5.87 | 97.8 | 6.00 | 2.13 | |
| Total BTEX | <0.300 | 0.300 | 05/03/2018 | ND | | | | | |
| Surrogate: 4-Bromofluorobenzene (PID | 101 9 | % 72-148 | , | | | | | | |
| Chloride, SM4500Cl-B | mg/ | 'kg | Analyze | d By: AC | | | | | |
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Chloride | 128 | 16.0 | 05/03/2018 | ND | 448 | 112 | 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 | 05/02/2018 | ND | 206 | 103 | 200 | 0.922 | |
| DRO >C10-C28* | <10.0 | 10.0 | 05/02/2018 | ND | 206 | 103 | 200 | 3.25 | |
| EXT DRO >C28-C36 | <10.0 | 10.0 | 05/02/2018 | ND | | | | | |
| Surrogate: 1-Chlorooctane | 97.3 | % 41-142 | | | | | | | |
| Surrogate: 1-Chlorooctadecane | 106 9 | 37.6-14 | 7 | | | | | | |

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Celey D. Keene, Lab Director/Quality Manager



BBC International, Inc. Cliff Brunson P.O. Box 805 Hobbs NM, 88241 Fax To: (575) 397-0397

| Received: | 05/01/2018 | Sampling Date: | 04/30/2018 |
|-------------------|-------------------------|---------------------|---------------|
| Reported: | 05/08/2018 | Sampling Type: | Soil |
| Project Name: | BLUE JAY FERDERAL #001H | Sampling Condition: | Cool & Intact |
| Project Number: | NONE GIVEN | Sample Received By: | Jodi Henson |
| Project Location: | COG - LEA CO NM | | |

Sample ID: E @ SURFACE (H801205-12)

| BTEX 8021B | mg/ | 'kg | Analyze | d By: MS | | | | | |
|---|----------------------------|-----------------|---------------|--------------|------|------------|---------------|-------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Benzene* | <0.050 | 0.050 | 05/03/2018 | ND | 1.77 | 88.3 | 2.00 | 3.22 | |
| Toluene* | <0.050 | 0.050 | 05/03/2018 | ND | 1.90 | 94.8 | 2.00 | 1.67 | |
| Ethylbenzene* | <0.050 | 0.050 | 05/03/2018 | ND | 1.91 | 95.4 | 2.00 | 1.98 | |
| Total Xylenes* | <0.150 | 0.150 | 05/03/2018 | ND | 5.87 | 97.8 | 6.00 | 2.13 | |
| Total BTEX | <0.300 | 0.300 | 05/03/2018 | ND | | | | | |
| Surrogate: 4-Bromofluorobenzene (PID 101 % 72 | | % 72-148 | , | | | | | | |
| Chloride, SM4500Cl-B | Chloride, SM4500Cl-B mg/kg | | | | | | | | |
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Chloride | 240 | 16.0 | 05/03/2018 | ND | 448 | 112 | 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 | 05/02/2018 | ND | 206 | 103 | 200 | 0.922 | |
| DRO >C10-C28* | <10.0 | 10.0 | 05/02/2018 | ND | 206 | 103 | 200 | 3.25 | |
| EXT DRO >C28-C36 | <10.0 10.0 | | 05/02/2018 ND | | | | | | |
| Surrogate: 1-Chlorooctane | 80.9 % 41-142 | | | | | | | | |
| Surrogate: 1-Chlorooctadecane 81.4 % 37.6-147 | | 7 | | | | | | | |

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



BBC International, Inc. Cliff Brunson P.O. Box 805 Hobbs NM, 88241 Fax To: (575) 397-0397

| Received: | 05/01/2018 | Sampling Date: | 04/30/2018 |
|-------------------|-------------------------|---------------------|---------------|
| Reported: | 05/08/2018 | Sampling Type: | Soil |
| Project Name: | BLUE JAY FERDERAL #001H | Sampling Condition: | Cool & Intact |
| Project Number: | NONE GIVEN | Sample Received By: | Jodi Henson |
| Project Location: | COG - LEA CO NM | | |

Sample ID: W @ SURFACE (H801205-13)

| BTEX 8021B | mg/ | kg | Analyze | d By: MS | | | | | |
|--------------------------------------|-----------------------|-----------------|-----------------|--------------|------|------------|---------------|-------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Benzene* | <0.050 | 0.050 | 05/03/2018 | ND | 1.77 | 88.3 | 2.00 | 3.22 | |
| Toluene* | <0.050 | 0.050 | 05/03/2018 | ND | 1.90 | 94.8 | 2.00 | 1.67 | |
| Ethylbenzene* | <0.050 | 0.050 | 05/03/2018 | ND | 1.91 | 95.4 | 2.00 | 1.98 | |
| Total Xylenes* | <0.150 | 0.150 | 05/03/2018 | ND | 5.87 | 97.8 | 6.00 | 2.13 | |
| Total BTEX | <0.300 | 0.300 | 05/03/2018 | ND | | | | | |
| Surrogate: 4-Bromofluorobenzene (PID | 99.8 | % 72-148 | | | | | | | |
| Chloride, SM4500Cl-B | 'kg | Analyze | d By: AC | | | | | | |
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Chloride | 320 | 16.0 | 05/03/2018 | ND | 448 | 112 | 400 | 0.00 | |
| 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 | 05/02/2018 | ND | 206 | 103 | 200 | 0.922 | |
| DRO >C10-C28* | <10.0 | 10.0 | 05/02/2018 | ND | 206 | 103 | 200 | 3.25 | |
| EXT DRO >C28-C36 | <10.0 | 10.0 | 05/02/2018 | ND | | | | | |
| Surrogate: 1-Chlorooctane | 85.3 % 41-142 | | | | | | | | |
| Surrogate: 1-Chlorooctadecane | lecane 87.5 % 37.6-14 | | 7 | | | | | | |

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BBC International, Inc. Cliff Brunson P.O. Box 805 Hobbs NM, 88241 Fax To: (575) 397-0397

| Received: | 05/01/2018 | Sampling Date: | 04/30/2018 |
|-------------------|-------------------------|---------------------|---------------|
| Reported: | 05/08/2018 | Sampling Type: | Soil |
| Project Name: | BLUE JAY FERDERAL #001H | Sampling Condition: | Cool & Intact |
| Project Number: | NONE GIVEN | Sample Received By: | Jodi Henson |
| Project Location: | COG - LEA CO NM | | |

Sample ID: S @ SURFACE (H801205-14)

| BTEX 8021B | mg/ | ′kg | Analyze | d By: MS | | | | | |
|--|--------------|-----------------|------------|--------------|------|------------|---------------|-------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Benzene* | <0.050 | 0.050 | 05/03/2018 | ND | 1.77 | 88.3 | 2.00 | 3.22 | |
| Toluene* | <0.050 | 0.050 | 05/03/2018 | ND | 1.90 | 94.8 | 2.00 | 1.67 | |
| Ethylbenzene* | <0.050 | 0.050 | 05/03/2018 | ND | 1.91 | 95.4 | 2.00 | 1.98 | |
| Total Xylenes* | <0.150 | 0.150 | 05/03/2018 | ND | 5.87 | 97.8 | 6.00 | 2.13 | |
| Total BTEX | <0.300 | 0.300 | 05/03/2018 | ND | | | | | |
| Surrogate: 4-Bromofluorobenzene (PID 99.9 % | | % 72-148 | 2 | | | | | | |
| Chloride, SM4500Cl-B | ′kg | Analyze | d By: AC | | | | | | |
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Chloride | 128 | 16.0 | 05/03/2018 | ND | 448 | 112 | 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 | 05/02/2018 | ND | 206 | 103 | 200 | 0.922 | |
| DRO >C10-C28* | <10.0 10.0 | | 05/02/2018 | ND | 206 | 103 | 200 | 3.25 | |
| EXT DRO >C28-C36 | <10.0 | 10.0 | 05/02/2018 | ND | | | | | |
| Surrogate: 1-Chlorooctane | 106 % 41-142 | | , | | | | | | |
| Surrogate: 1-Chlorooctadecane 114 % 37.6-147 | | 7 | | | | | | | |

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Celey D. Keene, Lab Director/Quality Manager



Notes and Definitions

| QM-07 | The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery. |
|-------|--|
| 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 SM4500CI-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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Celey D. Keene, Lab Director/Quality Manager

| Page 12 of 13 | |
|---------------|--|
|---------------|--|

PT2

ARDINAL LABORATORIES

101 East Mariand, Hobbs, NM 88240 (505) 393-2326 FAX (505) 393-2476 CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: BBC International, Inc. BILL TO ANALYSIS REQUEST Project Manager: Cliff Brunson P.O. #: Address: P.O. Box 805 `0G Company: city: Hobbs State: NM zip: 88241 Stell 41 Attn: Phone #: 575-397-6388 Fax #: 575-397-0397 Address: Project #: Project Owner: COG City: Jan Federal # 001H Project Name: CLup State: Zip: Project Location: 1_20 Phone #: Count Jeff arnola Sampler Name: Fax #: FOR LAB USE ONLY MATRIX PRESERV. SAMPLING (G)RAB OR (C)OMP. # CONTAINERS GROUNDWATER X WASTEWATER SOIL U Lab I.D. BTPX Sample I.D. ACID/BASE: ICE / COOL Hd SLUDGE OTHER: OTHER : H801205 U OF DATE TIME 6 0133 Sur 4.30 1 1 1 23 SP a 5 1 J 9:40 C 6 6 3 1 1 10:01 4 ς E P.C 6 1 1017 5 5 1 2 5 10:40 5 G V V D 5 1 -7 'n En 10 5 .rl 1 1 12:1 8 6 6 V 1 V 5 5 V ur 1:1 9 5 ir 6 30 V 11 5 (a) 5 2115 V

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| Sampler - UPS - Bus - Other: -4 | .JC 1.J | Yes Yes | / KI | | | | |
| | | LI NO LI NO | 7. | | National Participants | | |

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

Page 13 of 13

ARDINAL LABORATORIES

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240 (505) 393-2326 FAX (505) 393-2476

| Company Name | | | al, Inc. | | 8 | | 5 | | | | | BI | LL TO | hairean | - | 2 | | | ANAL | YSIS | RE | QUE | ST | | | |
|---|------------------|---------------------------|------------------------------|------------------|--------------|-------------|------------|-------------------|----------|-----------------------|------------|---------|---|----------------------|--------------|--------------|---------|-----|------|-----------------|-----|---------|----------|---|---|---|
| Project Manage | | | 0 | - | | | | | T | P.O. 1 | - | | <u>, , , , , , , , , , , , , , , , , , , </u> | | 1 | | | | | | | | <u> </u> | | 1 | |
| Address: P.O | . Box 805 | 5 | | | - | | | | 1 | Company: COG | | | | | 1 | | | , i | | | 1 | | | | | |
| city: Hobbs State: NM Zip: 88241 | | | | Attn: | 1.11 | | askell | e in | 1 | | | | | | | | | | • | | | | | | | |
| Phone #: 575-397-6388 Fax #: 575-397-0397 | | | | Addr | | | | | 1. | | | | | | | | | | | e i | | | | | | |
| Project #: Project Owner: C() G- | | | | | | City: | | | | 4 | 1 | j. | | | | | - | | | | | 2 2 | | | | |
| Project Name: Blue Juy Federal # 001H | | | | | | state | | 54 | Zip: | | 1 | | | | | | | | | | - 1 | | | | | |
| Project Locatio | n: Lea | Crivent | | -0 | 0 | <u>e 11</u> | gli | n ¹⁶ . | | hon | | | | | iter i | | | | | | í. | | | | | |
| Sampler Name: | JAA | Ormpl | ias | | ٥. | | in se | 20 | | ax # | | | | 1.11 | | | - 1 | | - | | < | _ × - 4 | | | | |
| FOR LAB USE ONLY | | | | | | - | MA | TRIX | _ | A.2940033603 | | ERV. | SAMPL | ING | | | | | | | | | | | | |
| Lab I.D. | | Sample I | .D. | (G)RAB OR (C)OMP | # CONTAINERS | GROUNDWATER | WASTEWATER | OIL | SLUDGE | OTHER : ACID/BASE: | ICE / COOL | OTHER : | DATE | TIME | cL | 07 PX | TPH EXt | | | o ¹⁴ | | | 3 | | | - |
| 1 | NQ | Sur | | 5 | 1 | - | V | | 4 | | V | | 4:30 | 3133 | | \checkmark | V | | | 12 | | == | | | | |
| 12 | EQ | Sur | | 5 | 1 | | | - | - | - | V | | | 2:33 | \checkmark | \checkmark | V | | | | | | | | | |
| 14 | W B S B | Sur | | 5 | 1 | | V | , | - | | V | - | 1 | 2:55 | \bigvee | V | V , | | | | | | | | | |
| 17 | | 201 | 0. | 5 | \vdash | | V | | - | + | V | | ¥. | 2.55 | V | ~ | V | | | | | | | - | | |
| | | 2102 | HA | | | | | | | 1 | | | * | | | | | - | | | | | | | | |
| | Maria | No. | 6 | | | | | | | | | | | | | | 80 | | | - | | | | | | |
| PLEASE NOTE: Liability a | nd Damages. Card | final's liability and cli | ent's exclusive remedy for a | ny clai | m arisi | ng whet | her base | d in cor | tract or | tort, sha | - | limited | to the amount na | id by the client for | rthe | | | | | | | | | | | |

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| Relinquished By: | Date: 1 | Received By: | | Phone Result: | □ Yes | D No | Add'l Phone #: |
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| VZSTOINLAS | Time: | Flatio Donly | 1/a | REMARKS: | | | 1 |
| Relinquished By: | Date: | Received By: | U. | | | | 5 |
| Flubis Samer of | 3120 | you den | son | | | | |
| Delivered By: (Circle One) | 15 | | CHECKED BY: | | | | |
| Sampler - UPS - Bus - Other: -4 | 30/-4.35 | Cool Intact Yes Yes No No | Initials | | | | |

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



May 29, 2018

Cliff Brunson BBC International, Inc. P.O. Box 805 Hobbs, NM 88241

RE: BLUE JAY FERDERAL #001H

Enclosed are the results of analyses for samples received by the laboratory on 05/22/18 11:20.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-17-10. 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 | Total Haloacetic Acids (HAA-5) |
|------------------|--------------------------------|
| Method EPA 524.2 | Total Trihalomethanes (TTHM |
| Method EPA 524.4 | Regulated VOCs (V1, V2, V3) |

Cardinal Laboratories is accredited through the State of New Mexico Environment Department for:

| Method SM 9223-B | Total Coliform and E. coli (Colilert MMO-MUG) |
|------------------|---|
| Method EPA 524.2 | Regulated VOCs and Total Trihalomethanes (TTHM) |
| Method EPA 552.2 | Total Haloacetic Acids (HAA-5) |

Accreditation applies to public drinking water matrices for State of Colorado and New Mexico.

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. Keine

Celey D. Keene Lab Director/Quality Manager



| BBC International, Inc. P.O. Box 805 Hobbs NM, 88241 | O. Box 805 Project Number obbs NM, 88241 Project Manager | | | Reported: 29-May-18 15:10 |
|--|--|--------|-----------------|------------------------------|
| Sample ID | Laboratory ID | Matrix | Date Sampled | Date Received |
| SP 1 @ 11' | H801406-01 | Soil | 18-May-18 10:44 | 22-May-18 11:20 |
| SP 1 @ 16' | H801406-02 | Soil | 18-May-18 12:59 | 22-May-18 11:20 |

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



| BBC International, Inc. P.O. Box 805 Hobbs NM, 88241 | Project:BLUE JAY FERDERAL #001HReported:Project Number:NONE GIVEN29-May-18 15:10Project Manager:Cliff BrunsonFax To:(575) 397-0397 | | | | | | | | ::10 | |
|--|--|-----|--------------------|--------------|-----------|---------|---------|-----------|-----------|-------|
| SP 1 @ 11' H801406-01 (Soil) | | | | | | | | | | |
| Analyte | Result | MDL | Reporting Limit | Units | Dilution | Batch | Analyst | Analyzed | Method | Notes |
| | | | Cardiı | nal Laborato | ories | | | | | |
| Inorganic Compounds | | | | | | | | | | |
| Chloride | 304 | | 16.0 | mg/kg | 4 | 8052206 | AC | 22-May-18 | 4500-Cl-B | |
| | | | Green Ana | lytical Labo | oratories | | | | | |
| Soluble (DI Water Extraction) | | | | | | | | | | |
| Chloride | 374 | | 10.0 | mg/kg wet | 10 | B805183 | JDA | 24-May-18 | EPA300.0 | |

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Celey D. Keene, Lab Director/Quality Manager



| BBC International, Inc. P.O. Box 805 Hobbs NM, 88241 | Project: BLUE JAY FERDERAL #001H Project Number: NONE GIVEN Project Manager: Cliff Brunson Fax To: (575) 397-0397 | | | | | | | | Reported: 29-May-18 15:10 | | |
|--|--|-----|--------------------|----------------------------|-----------|---------|---------|-----------|------------------------------|-------|--|
| | | | | BP 1 @ 16' 01406-02 (So | il) | | | | | | |
| Analyte | Result | MDL | Reporting Limit | Units | Dilution | Batch | Analyst | Analyzed | Method | Notes | |
| | | | Cardii | nal Laborat | ories | | | | | | |
| Inorganic Compounds | | | | | | | | | | | |
| Chloride | 384 | | 16.0 | mg/kg | 4 | 8052206 | AC | 22-May-18 | 4500-Cl-B | | |
| | | | | | | | | | | | |
| | | | Green Ana | alytical Labo | oratories | | | | | | |
| Soluble (DI Water Extraction) | | | | | | | | | | | |
| Chloride | 399 | | 10.0 | mg/kg wet | 10 | B805183 | JDA | 24-May-18 | EPA300.0 | | |

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Celey D. Keene, Lab Director/Quality Manager



| BBC International, Inc. P.O. Box 805 Hobbs NM, 88241 | Project: BLUE JAY FERDERAL #001H Project Number: NONE GIVEN Project Manager: Cliff Brunson Fax To: (575) 397-0397 | Reported: 29-May-18 15:10 |
|--|--|------------------------------|
|--|--|------------------------------|

Inorganic Compounds - Quality Control

Cardinal Laboratories

| Analyte | Result | Reporting Limit | Units | Spike Level | Source Result | %REC | %REC Limits | RPD | RPD Limit | Notes |
|------------------------------|--------|--------------------|-------|----------------|------------------|-----------|----------------|------|--------------|-------|
| Batch 8052206 - 1:4 DI Water | | | | | | | | | | |
| Blank (8052206-BLK1) | | | | Prepared & | Analyzed: | 22-May-18 | | | | |
| Chloride | ND | 16.0 | mg/kg | | | | | | | |
| LCS (8052206-BS1) | | | | Prepared & | Analyzed: | 22-May-18 | | | | |
| Chloride | 432 | 16.0 | mg/kg | 400 | | 108 | 80-120 | | | |
| LCS Dup (8052206-BSD1) | | | | Prepared & | Analyzed: | 22-May-18 | | | | |
| Chloride | 432 | 16.0 | mg/kg | 400 | | 108 | 80-120 | 0.00 | 20 | |

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Celey D. Keene, Lab Director/Quality Manager



| BBC International, Inc. P.O. Box 805 Hobbs NM, 88241 | Project: BLUE JAY FERDERAL #001H Project Number: NONE GIVEN Project Manager: Cliff Brunson Fax To: (575) 397-0397 | Reported: 29-May-18 15:10 |
|--|--|------------------------------|
|--|--|------------------------------|

Soluble (DI Water Extraction) - Quality Control

Green Analytical Laboratories

| Analyte | Result | Reporting Limit | Units | Spike Level | Source Result | %REC | %REC Limits | RPD | RPD Limit | Notes |
|---|--------|--------------------|-----------|----------------|------------------|-------------|----------------|------|--------------|-------|
| Batch B805183 - General Prep - Wet Chem | | | | | | | | | | |
| Blank (B805183-BLK1) | | | | Prepared: 2 | 24-May-18 | Analyzed: 2 | 5-May-18 | | | |
| Chloride | ND | 10.0 | mg/kg wet | | | | | | | |
| LCS (B805183-BS1) | | | | Prepared & | Analyzed: | 24-May-18 | : | | | |
| Chloride | 240 | 10.0 | mg/kg wet | 250 | | 96.1 | 85-115 | | | |
| LCS Dup (B805183-BSD1) | | | | Prepared & | Analyzed: | 24-May-18 | ; | | | |
| Chloride | 234 | 10.0 | mg/kg wet | 250 | | 93.5 | 85-115 | 2.74 | 20 | |

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Celeg D. Keine

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

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240 (505) 393-2326 FAX (505) 393-2476

ARDINAL LABORATORIES

Page 8 of 8

| Company Name: BBC International, Inc. | BILL TO | ANALYSIS REQUEST |
|--|---|------------------------|
| Project Manager: Cliff Brunson | P.O. #: | |
| Address: P.O. Box 805 | Company: | |
| city: Hobbs State: NM Zip: 88241 | Attn: | |
| Phone #: 575-397-6388 Fax #: 575-397-0397 | Address: | |
| Project #: Project Owner: (O(7 | City: | |
| Project Name: Blue Jacy Feel 14 | State: Zip: | |
| Project Location: | Phone #: | |
| Sampler Name: Jeff Ornelus | Fax #: | |
| FOR LAB USE ONLY MATRIX | PRESERV. SAMPLING | |
| <u>a</u> W w | | 2 2 |
| Tap I'D' Samble I'D' # CONTAINERS GROUNDWATER Soll OIL | | $\lesssim \mathcal{R}$ |
| Tap I'D' Samble I'D' Page 1'D' Page 1'D' | | |
| HEAD OF THE SOLUTION OF THE SO | OTHER: ACID/BASE ICE / COOL OTHER: ATEN: | 22 |
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| PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising whether based in contract | or ton, shall be limited to the amount paid by the client for t | he |
| analyses. An claims including mose for negligence and any other cause whatsoever shall be deemed waived unless made in writing and service. In no event shall Cardinal be liable for incidental or consequental damages, including without limitation, by spess interructions. | d received by Cardinal within 30 days after completion of the | applicable |
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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.

| 1220 S. St. Fra | ncis Dr., Santa | Fe, NM 87505 | | Sa | inta Fe | e, NM 875 | 505 | | | | |
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| Date: July 16 | | | 5-746-201 | 0 | | see a | ttached dire | ctive | | | |
| Attach Addi | tional Shee | ts If Necessa | iry | | [| 1RP-475 | 8 nOY | 17202477: | 25 p | OY17 | 720248056 |

Operator/Responsible Party,

The OCD has received the form C-141 you provided on _7/16/2017_ regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number _1RP-4758_ has been assigned. Please refer to this case number in all future correspondence.

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

The responsible person shall complete <u>division-approved corrective action</u> for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC. [emphasis added]

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District _1_ office in __Hobbs____ on or before _8/21/2017_. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

• Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.

• Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C_6 thru C_{36}), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.

• Nominal detection limits for field and laboratory analyses must be provided.

• Composite sampling is not generally allowed.

• Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

•Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.

• If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.

• Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.

Jim Griswold OCD Environmental Bureau Chief 1220 South St. Francis Drive Santa Fe, New Mexico 87505 505-476-3465 jim.griswold@state.nm.us