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 Department

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 NRM2015454866

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	NRM2015454866
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party XTO Energy OGRID		5380			
		Contact Te	Telephone 432-221-7331		
		Incident #	(assigned by OCD)		
Contact maili	ing address	522 W. Mermod	, Carlsbad, NM 88	3220	
Location of Release Source					
Latitude 32.12424 Longitude Longitude -103.89604 (NAD 83 in decimal degrees to 5 decimal places)					
Site Name P	eierce Canyo	on 17 TB		Site Type T	ank Battery
Date Release				API# (if app	
Unit Letter	Section	Township	Range	Coun	tu]
P	17	25S	30E	Eddy	
Surface Owner: State Federal Private (Name: Nature and Volume of Release Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)					
Crude Oil		Volume Release			Volume Recovered (bbls)
× Produced	Water	Volume Release	d (bbls) 35		Volume Recovered (bbls) 35
	Is the concentration of total dissolved solids (TDS) in the produced water >10,000 mg/l?		` '	Yes No	
Condensa				Volume Recovered (bbls)	
☐ Natural G	Natural Gas Volume Released (Mcf)		Volume Recovered (Mcf)		
Other (des	scribe)	Volume/Weight	Released (provide	e units)	Volume/Weight Recovered (provide units)
Cause of Release Water tanks overflowed through top of the thief hatches on the PC 17 TB. A vac truck was dispatched and recovered 35 bbl PW from inside impermeable containment. Liner inspection determined the liner was insufficient. A third-party contractor has been retained for remediation activities.					

Form C-141 Page 2

State of New Mexico Oil Conservation Division

Incident ID	NRM2015454866
District RP	
Facility ID	
Application ID	

Was this a major	If YES, for what reason(s) does the responsible party consider this a major release?
release as defined by	Release was over 25 barrels
19.15.29.7(A) NMAC?	
🗷 Yes 🗌 No	
	otice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?
	e Bratcher; Rob Hamlet; Victoria Venegas; blm_nm_cfo_spill@blm.gov; Crisha
Morgan; Griswold, Jim, E	EMNRD' via email on Monday, May 18, 2020 1:51 PM.
	Initial Response
	initial Response
The responsible	party must undertake the following actions immediately unless they could create a safety hazard that would result in injury
_	ease has been stopped.
	s been secured to protect human health and the environment.
	ave been contained via the use of berms or dikes, absorbent pads, or other containment devices.
▲ All free liquids and re	ecoverable materials have been removed and managed appropriately.
If all the actions describe	d above have not been undertaken, explain why:
N/A	
Per 19 15 29 8 B (4) NM	IAC the responsible party may commence remediation immediately after discovery of a release. If remediation
	a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred
	nt area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.
I hereby certify that the info	rmation given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and
	required to report and/or file certain release notifications and perform corrective actions for releases which may endanger
	nent. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have ate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In
addition, OCD acceptance of	f a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws
and/or regulations.	
Printed Name: Kyle Littt	Title: SH&E Supervisor
Signature	Date: 5-29-20
	422 221 7221
email:	Telephone:
OCD Only	
OCD Only	
Received by: Ramo	ona Marcus Date: 6/2/2020

NRM2015454866

Location:	Pierce Canyon 17 TB		
Spill Date:			
	Area 1		
Approximate A	rea =	196.51	cu. ft.
	VOLUME RECOVERED		
Total Produced	Water =	35.00	bbls

TOTAL VOLUME OF LEAK		
Total Produced Water = 35.00 bbls		
TOTAL VOLUME RECOVERED		
Total Produced Water = 35.00 bbls		

	Page 4 of	67
Incident ID	NRM2015454866	
District RP		
Facility ID		
Application ID		

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	>100 (ft bgs)		
Did this release impact groundwater or surface water?	☐ Yes ☑ No		
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ☑ No		
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes ☑ No		
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ☑ No		
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ☑ No		
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ☑ No		
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ☑ No		
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ☑ No		
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ☑ No		
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ☑ No		
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ☑ No		
Did the release impact areas not on an exploration, development, production, or storage site?	☐ Yes ☑ No		
Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.			
Characterization Report Checklist: Each of the following items must be included in the report.			
 ✓ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells. ✓ Field data ✓ Data table of soil contaminant concentration data ✓ Depth to water determination ✓ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release ✓ Boring or excavation logs 			
Photographs including date and GIS information			

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

☐ Laboratory data including chain of custody

Received by OCD: 2/12/2021 8:24:17 AM Form C-141 State of New Mexico Oil Conservation Division Page 4

	Page 3 of	U
D	NRM2015454866	
D		

Incident ID	NRM2015454866
District RP	
Facility ID	
Application ID	

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

and/or regulations.	
Printed Name: _ Kyle Littrell	Title: SH&E Supervisor
Signature: Signature	Date: 02/10/2021
email:e_Littrell@xtoenergy.com	Telephone: 432-221-7331
OCD O I	
OCD Only	
Received by:	Date:

Page 6 of 67

Incident ID NRM2015454866

District RP
Facility ID
Application ID

Remediation Plan

Remediation Plan Checklist: Each of the following items must be included	in the plan.		
 □ Detailed description of proposed remediation technique □ Scaled sitemap with GPS coordinates showing delineation points □ Estimated volume of material to be remediated □ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC □ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required) 			
<u>Deferral Requests Only</u> : Each of the following items must be confirmed as	part of any request for deferral of remediation.		
Contamination must be in areas immediately under or around production deconstruction.	equipment where remediation could cause a major facility		
Extents of contamination must be fully delineated.			
Contamination does not cause an imminent risk to human health, the envi	conment, or groundwater.		
Signature: Date:	rase notifications and perform corrective actions for releases -141 report by the OCD does not relieve the operator of diate contamination that pose a threat to groundwater, e of a C-141 report does not relieve the operator of		
OCD Only			
Received by: Date: _			
Approved	☐ Denied ☐ Deferral Approved		
Signature: Date:			

Page 7 of 67

Incident ID NRM2015454866

District RP
Facility ID
Application ID

Remediation Plan

Remediation Plan Checklist: Each of the following items must be included in the plan.
 □ Detailed description of proposed remediation technique □ Scaled sitemap with GPS coordinates showing delineation points □ Estimated volume of material to be remediated □ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC □ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)
<u>Deferral Requests Only</u> : Each of the following items must be confirmed as part of any request for deferral of remediation.
☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
Extents of contamination must be fully delineated.
☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.
Printed Name:Kyle Littrell Title:SH&E Supervisor
Signature: Date: 02/10/2021
email: Telephone: Telephone:
OCD Only
Received by: Robert Hamlet Date: 6/30/2021
☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved
Signature: Robert Hamlet Date: 6/30/2021

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 Department

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 NRM2015454866

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	NRM2015454866
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party XTO Energy OGRID			OGRID	5380		
			elephone 432-221	-7331		
			Incident #	(assigned by OCD)		
Contact mail	ing address	522 W. Mermod	, Carlsbad, NM 88	220		
			Location	of Release So		
Latitude 32.1	12424		(NAD 83 in dec	Longitude _ imal degrees to 5 decim	-103.89604 mal places)	
Site Name	Pierce Canyo	on 17 TB		Site Type T	ank Battery	
Date Release	Discovered	5-17-2020		API# (if app	licable)	
Unit Letter	Section	Township	Range	Coun	ty	
P	17	25S	30E	Edd	y	
☐ Crude Oi		(s) Released (Select a	I that apply and attach	Volume of l	Release justification for the value Volume Recovered	
× Produced	Water	Volume Release	d (bbls) 35		Volume Recovere	ed (bbls) 35
		Is the concentration of total dissolved solids (TDS) in the produced water >10,000 mg/l?			Yes No	
Condensa	ite	Volume Released (bbls)			Volume Recovere	ed (bbls)
☐ Natural C		Volume Released (Mcf)			Volume Recovere	
Other (de	scribe)	Volume/Weight	Released (provide	units)	Volume/Weight I	Recovered (provide units)
Cause of Rel	33 001 1	w from inside in	hrough top of the tipermeable contained for remediation	iment. Liner inspec	PC 17 TB. A vac	truck was dispatched and recovered e liner was insufficient. A third-party

Form C-141 Page 2

State of New Mexico Oil Conservation Division

Incident ID	NR M2015454866
District RP	
Facility ID	
Application ID	

Was this a major	If YES, for what reason(s) does the responsible party consider this a major release?
release as defined by	Release was over 25 barrels
19.15.29.7(A) NMAC?	10.00 miles 0.00 and
x Yes □ No	
If VFS was immediate n	otice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?
· ·	te Bratcher; Rob Hamlet; Victoria Venegas; blm nm cfo spill@blm.gov; Crisha
	EMNRD' via email on Monday, May 18, 2020 1:51 PM.
	Initial Response
The responsible	party must undertake the following actions immediately unless they could create a safety hazard that would result in injury
► The source of the rele	ease has been stopped.
	as been secured to protect human health and the environment.
I ·	ave been contained via the use of berms or dikes, absorbent pads, or other containment devices.
_	ecoverable materials have been removed and managed appropriately.
	d above have not been undertaken, explain why:
N/A	a above have <u>not</u> been undertaken, oxplain why:
IVA	
D 1011000D (0)2D	
	AC the responsible party may commence remediation immediately after discovery of a release. If remediation a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred
	nt area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.
Lhereby certify that the info	ormation given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and
regulations all operators are	required to report and/or file certain release notifications and perform corrective actions for releases which may endanger
	ment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have
	ate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws
and/or regulations.	
Printed Name: Kyle Litti	rell SH&E Supervisor Title:
1/2	5-29-20
Signature	Date:
email:	Telephone: 432-221-7331
OCD Only	
Received by: Ramo	ona Marcus Date: 6/2/2020
Received by.	Dutc.

NRM2015454866

Location:	Pierce Canyon 17 TB		
Spill Date:	5/17/2020		
	Area 1		
Approximate A	rea =	196.51	cu. ft.
	VOLUME RECOVERED		
Total Produced	Water =	35.00	bbls

TOTAL VOLUME OF LE	AK
Total Produced Water =	35.00 bbls
TOTAL VOLUME RECOV	ERED
Total Produced Water =	35.00 bbls

Page 11 of 67

Incident ID NPM2015454866

Incident ID	NRM2015454866
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	>100 (ft bgs)				
Did this release impact groundwater or surface water?	☐ Yes ☑ No				
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ☑ No				
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes ☑ No				
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ☑ No				
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ☑ No				
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ☑ No				
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ☑ No				
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ☑ No				
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ☑ No				
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ☑ No				
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ☑ No				
Did the release impact areas not on an exploration, development, production, or storage site?	☐ Yes ☑ No				
Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.					
Characterization Report Checklist: Each of the following items must be included in the report.					
Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring well Field data	ls.				
Data table of soil contaminant concentration data Depth to water determination					
Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release					
 ☑ Boring or excavation logs ☑ Photographs including date and GIS information 					
☐ Topographic/Aerial maps					

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

Received by OCD: 2/12/2021 8:24:17 AM Form C-141 State of New Mexico Oil Conservation Division Page 4

Received by: ___

Page 12 of	67
NRM2015454866	

Incident ID	NRM2015454866
District RP	
Facility ID	
Application ID	

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. ____ Title: SH&E Supervisor Printed Name: Signature: Date: 02/10/2021 Myle_Littrell@xtoenergy.com 432-221-7331 Telephone: **OCD Only**

Date:

Page 13 of 67

Incident ID NRM2015454866

District RP
Facility ID
Application ID

Remediation Plan

Remediation Plan Checklist: Each of the following items must be included in the plan.
 □ Detailed description of proposed remediation technique □ Scaled sitemap with GPS coordinates showing delineation points □ Estimated volume of material to be remediated □ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC □ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)
<u>Deferral Requests Only</u> : Each of the following items must be confirmed as part of any request for deferral of remediation.
☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
Extents of contamination must be fully delineated.
Contamination does not cause an imminent risk to human health, the environment, or groundwater.
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.
Printed Name:Kyle Littrell Title:SH&E Supervisor
Signature: Date: Date:
email: Telephone:
OCD Only
OCD OILY
Received by: Date:
☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved
Signature: Date:

wsp

WSP USA

3300 North "A" Street Building 1, Unit 222 Midland, Texas 79705 432.704.5178

February 10, 2021

District II New Mexico Oil Conservation Division 811 South First Street Artesia, New Mexico 88210

RE: Closure Request Addendum
XTO Energy, Inc.
Pierce Canyon 17 TB
Incident Number NRM2015454866
Eddy County, New Mexico

To Whom it May Concern:

WSP USA Inc. (formerly LT Environmental, Inc.), on behalf of XTO Energy, Inc. (XTO), is pleased to present the following addendum to an original Deferral Request submitted August 5, 2020. This Addendum provides an update to the delineation efforts at Pierce Canyon 17 Tank Battery (TB) (Site) in Unit P, Section 17, Township 25 South, Range 30 East, in Eddy County, New Mexico (Figure 1). XTO was notified by the New Mexico Oil Conservation Division (NMOCD) on December 7, 2020 of the denial of the original Deferral Request. In the denial, NMOCD expressed concern that residual impacts to soil were not vertically delineated at the deepest sample point location (BH03). Based on the additional delineation activities described below, XTO is requesting no further action (NFA) for Incident Number NRM2015454866.

REVISIONS

The revised report addresses the following updates:

- Residual soil impacts below the lined secondary containment were not vertically delineated due to equipment refusal during the initial attempt and safety concerns prohibiting mechanical excavation within the containment. WSP returned to the Site to advance a soil boring at the original BH03 borehole location to 4 feet below ground surface (bgs), and subsequently collected delineation soil sample BH03C. The description of the supplemental delineation event, including photographic evidence, the respective lithologic/soil sampling log, and laboratory analytical report, are presented in this Addendum.
- This Addendum only includes field summaries relevant to fulfilling the condition issued by the NMOCD on December 7, 2020. NMOCD requested vertical delineation of the deepest sample inside the secondary lined containment to the applicable Table 1 Closure Criteria. All previous data can be referenced in the original report.



District II Page 2

BACKGROUND

On May 17, 2020, the water tanks overflowed through the top of the thief hatches, resulting in 35 barrels (bbls) of produced water being released into the lined secondary containment. A vacuum truck was immediately dispatched to the Site to recover freestanding fluids, of which approximately 35 bbls of produced were recovered. A liner integrity inspection was immediately conducted by XTO personnel following the recovery. A 48-hour advance notice of liner inspection was provided via email to the NMOCD District II office and upon inspection, the liner was determined to be compromised. XTO reported the release to the NMOCD via email on May 18, 2020 and submitted a Release Notification and Corrective Action Form C-141 (Form C-141) on May 29, 2020 that was subsequently assigned Incident Number NRM2015454866.

SITE CHARACTERIZATION

As stated in the original report, WSP characterized the Site according to Table 1, *Closure Criteria for Soils Impacted by a Release*, of Title 19, Chapter 15, Part 29, Section 12 (19.15.29.12) of the New Mexico Administrative Code (NMAC). Results from the characterization desktop review are presented on Form C-141, Site Assessment/Characterization Form. Potential site receptors are identified on Figure 1. The following Closure Criteria were applied:

- Benzene: 10 milligrams per kilogram (mg/kg)
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX): 50 mg/kg
- Total petroleum hydrocarbons (TPH)-gasoline range organics (GRO) and TPH-diesel range organics (DRO): 1,000 mg/kg
- TPH: 2,500 mg/kg
- Chloride: 20,000 mg/kg

DELINEATION ACTIVITIES

On January 7, 2021, WSP utilized a Shaw Tool, Ltd Portable Core Drill to advance the area associated with soil sample BH03 to determine the vertical extent of impact. Soil sample BH03C was collected at 4 feet bgs. Due to the location of the release, a Hot Work Permit was necessary to conduct investigative motor or electric powered drilling methods within 35 feet of any hydrocarbon sources. In coordination with XTO, an XTO safety representative was retained to conduct air monitoring as part of the permit process for investigative core drilling activities.

The borehole soil sample was field screened for volatile aromatic hydrocarbons and chloride utilizing a photo-ionization detector (PID) and Hach® chloride QuanTab® test strips, respectively. Field screening results and observations for the continuation of BH03 were logged on a lithologic/soil sampling log, which is included in Attachment 1. The delineation soil sample location is depicted on Figure 2. Photographic evidence is included in Attachment 2.



District II Page 3

The delineation soil sample was placed directly into a pre-cleaned glass jar, labeled with the location, date, time, sampler name, method of analysis, and immediately placed on ice. The soil sample was transported at or below 4 degrees Celsius (°C) under strict chain-of-custody (COC) procedures to Eurofins Laboratories (Eurofins) in Carlsbad, New Mexico, for analysis of BTEX following United States Environmental Protection Agency (EPA) Method 8021B; TPH-GRO, TPH-DRO, and TPH-oil range organics (ORO) following EPA Method 8015M/D; and chloride following EPA Method 300.0.

ANALYTICAL RESULTS

Laboratory analytical results from the delineation soil sample indicates compliance with Closure Criteria and defines the vertical extent of residual subsurface impacts. Laboratory analytical results are summarized in Table 1. The complete laboratory analytical report is included in Attachment 3.

DEFERRAL REQUEST

Due to the advancement of soil sample BH03C, WSP achieved vertical delineation at sample location BH03 in accordance with the Closure Criteria at approximately 4 feet bgs within the lined secondary containment and addressed NMOCD's reason for denial of the original Deferral Request. Based on the laboratory analytical results, WSP estimates approximately 637 cubic yards of impacted soil is left in place below the 4,302 square foot lined secondary containment. WSP requests NMOCD to review the supplemental delineation data and reconsider the denial associated with the original Deferral Request. As such, XTO respectfully requests to defer final remediation of soil impacts for Incident Number NRM2015454866 until well plugging and abandonment.

If you have any questions or comments, please do not hesitate to contact Ms. Ashley Ager at (970) 385-1096.

Sincerely,

WSP USA

Anna Byers

anna Byers

Consultant, Geologist

Ashley L. Ager, P.G.

ashley L. ager

Managing Director, Geologist



District II Page 4

cc: Kyle Littrell, XTO

Robert Hamlet, NMOCD Victoria Venegas, NMOCD Bureau of Land Management

Attachments:

Figure 1 Site Location Map

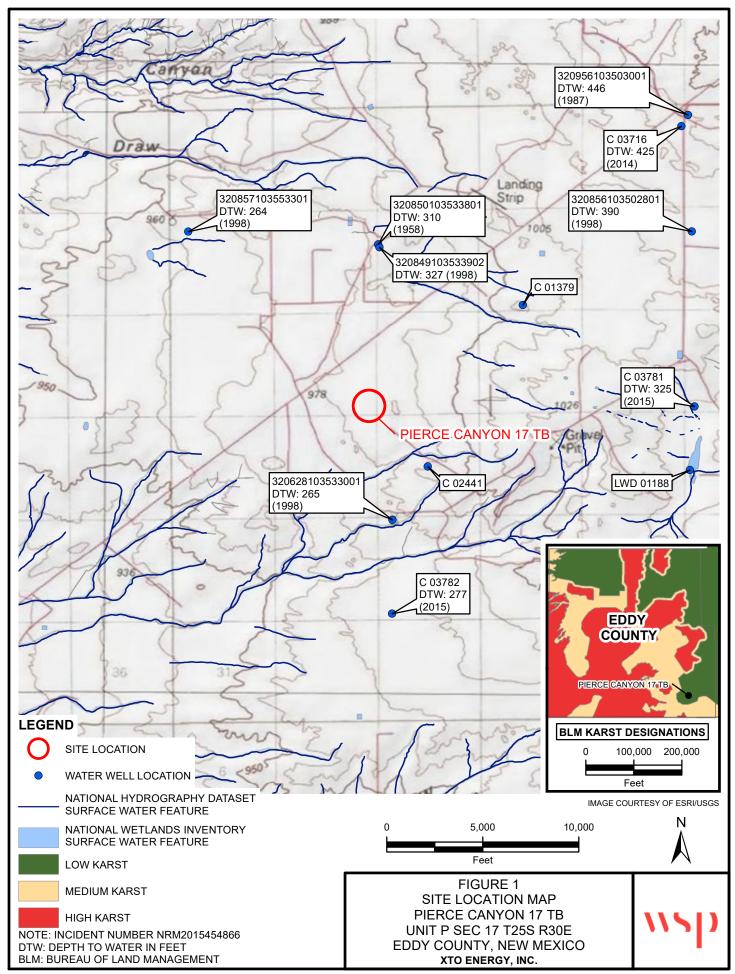
Figure 2 Delineation Soil Sample Location Map

Figure 3 Deferral Area Map
Table 1 Soil Analytical Results

Attachment 1 Lithologic/Soil Sampling Log

Attachment 2 Photographic Log

Attachment 3 Laboratory Analytical Reports



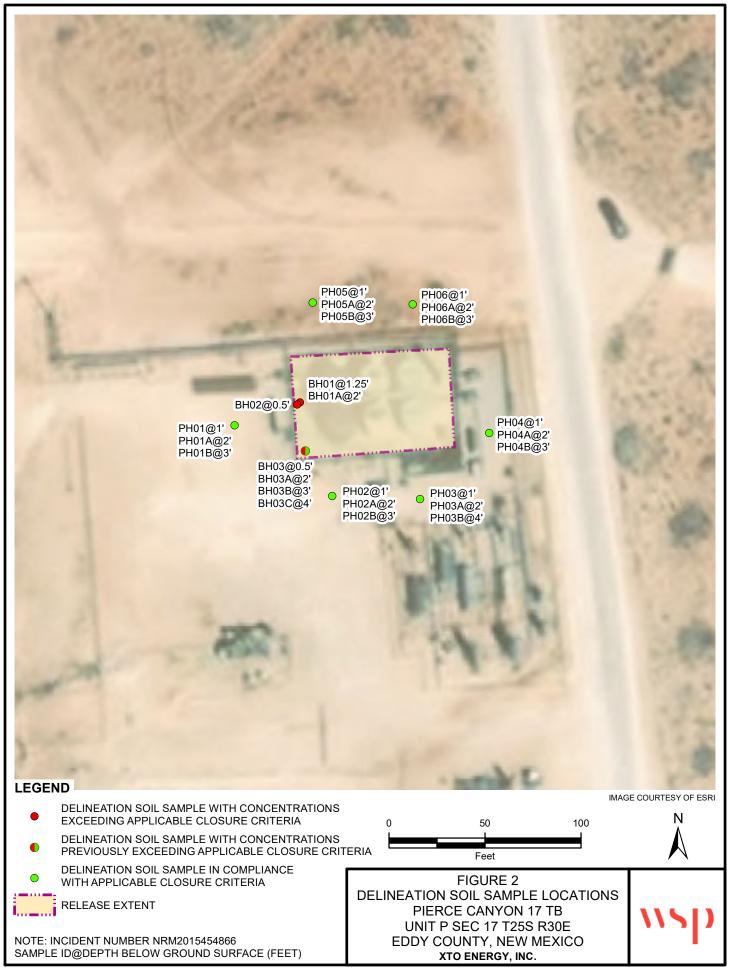




Table 1

Soil Analytical Results Pierce Canyon 17 TB Incident Number NRM2015454866 Eddy County, New Mexico

Sample ID	Sample Date	Sample Depth (ft bgs)	Benzene (mg/kg)	BTEX (mg/kg)	TPH-DRO (mg/kg)	TPH-GRO (mg/kg)	TPH-ORO (mg/kg)	Total GRO+DRO (mg/kg)	TPH (mg/kg)	Chloride (mg/kg)
NMOCD Table 1 Closure Criteria (NMAC 19.15.29) 10			10	50	NE	NE	NE	1,000	2,500	20,000
Delineation Samples										
BH03	07/16/2020	0.5	< 0.0998	15.9	6,600	901	417	7,500	7,920	126
BH03A	07/16/2020	2	< 0.0996	80.8	6,880	1,200	434	8,080	8,510	467
вн03в	07/17/2020	3	< 0.00500	8.78	4,250	571	228	4,820	5,050	462
ВН03С	01/07/2021	4	0.0123	2.88	<49.8	575	63.7	575	639	85.6

Notes:

ft - feet/foot

mg/kg - milligrams per kilograms

BTEX - benzene, toluene, ethylbenzene, and total xylenes

TPH - total petroleum hydrocarbons

DRO - diesel range organics

GRO - gasoline range organics

ORO - oil range organics

NMOCD - New Mexico Oil Conservation Division

NMAC - New Mexico Administrative Code

< - indicates result is less than the stated laboratory method practical quantitation limit

NE - Not Established

BOLD - indicates results exceed the higher of the background sample result or applicable regulatory standard

Greyed data represents samples that were excavated

BH or PH Name: Date: **WSP USA** BH03 7/16 - 7/17/2020, 1/7/2021 508 West Stevens Street Carlsbad, New Mexico 88220 Site Name: PLU PC 17 TB RP or Incident Number: NRM2015454866 LTE Job Number: TE012920085 Method: HVAC, Hammer Drill and Core LITHOLOGIC / SOIL SAMPLING LOG Logged By: FS and TC Lat/Long: 32.124233, -103.895873 Field Screening: Total Depth: 4 ft bgs Hole Diameter: 2.5 inches Hach chloride strips, PID

Comments: Chloride screenings were conducted with a 1:4 dilution factor of soil to distilled water. Reported values include a 40% correction factor.

SAA: Same as above

Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample #	Sample Depth (ft bgs)	Depth (ft bgs)	USCS/Rock Symbol	Lithology/Remarks
						0	SP	SAND, dry, tan-light brown, poorly graded, fine-very fine, abundant caliche gravel, tan-off white, poorly consolidated
M	436	1,042	Y	BH03	0.5	-		SAA
D	436	1,530	N		-	1	SM	SILTY sand, dry, light brown-brown, cohesive, low plasticity
D	436	883.5	N	BH03A	2	2	ССНЕ	CALICHE, dry, tan-off white, well-consolidated, some silt
D	868	1,204	N	внозв	3	3	ССНЕ	SAA
D	683	32.3	N	внозс	4	4	ССНЕ	SAA

TD @ 4 ft bgs



	PHOTOGRAPHIC LOG	
XTO ENERGY, Inc.	Pierce Canyon 17 TB	TE012920085
	Eddy County, New Mexico	

Photo No.	Date			
1	January 7, 2021			
Southwestern c	orner of the tank			
battery containment where BH03				
1 January 7, 2021 Southwestern corner of the tank				



Photo No.	Date				
2	January 7, 2021				
Tank battery co	ontainment liner				
opening for sub	surface access to				
advanc	e BH03.				





	PHOTOGRAPHIC LOG	
XTO ENERGY, Inc.	Pierce Canyon 17 TB	TE012920085
	Eddy County, New Mexico	

Photo No.	Date
3	January 7, 2021
lling adva	ncement at BH03.

Photo No.	Date	
4	January 7, 2021	
Liner repair of cu	tt opening at BH03.	



Certificate of Analysis Summary 667503

LT Environmental, Inc., Arvada, CO

Project Name: PLU PC 17 TB

Project Id:

Project Location:

Contact:

012920085

Dan Moir **Eddy County** **Date Received in Lab:** Thu 07.16.2020 17:25

Report Date: 07.17.2020 19:13

Project Manager: Jessica Kramer

	Lab Id:	667503-0	001	667503-0	02			
Analysis Paguested	Field Id:	BH03	3	BH03A	A			
Analysis Requested	Depth:	0.5- ft	:	2- ft				
	Matrix:	SOIL	,	SOIL				
	Sampled:	07.16.2020	09:23	07.16.2020	09:37			
BTEX by EPA 8021B	Extracted:	07.17.2020	10:42	07.17.2020	10:42			
	Analyzed:	07.17.2020	15:58	07.17.2020	16:20			
	Units/RL:	mg/kg	RL	mg/kg	RL			
Benzene		< 0.0998	0.0998	< 0.0996	0.0996			
Toluene		0.467	0.399	3.00	0.398			
Ethylbenzene		1.25	0.399	5.98	0.398			
m,p-Xylenes		8.95	0.798	56.1	0.797			
o-Xylene		5.22	0.399	15.7	0.398			
Total Xylenes		14.2	0.399	71.8	0.398			
Total BTEX		15.9	0.0998	80.8	0.0996			
Chloride by EPA 300	Extracted:	07.17.2020	13:00	07.17.2020	13:00			
	Analyzed:	07.17.2020	14:57	07.17.2020	15:14			
	Units/RL:	mg/kg	RL	mg/kg	RL			
Chloride		126	9.94	467	10.1			
TPH by SW8015 Mod	Extracted:	07.17.2020	14:30	07.17.2020	14:30			
	Analyzed:	07.17.2020	16:40	07.17.2020	16:40			
	Units/RL:	mg/kg	RL	mg/kg	RL			
Gasoline Range Hydrocarbons (GRO)		901	249	1200	249			
Diesel Range Organics (DRO)		6600	249	6880	249			
Motor Oil Range Hydrocarbons (MRO)		417	249	434	249			
Total GRO-DRO		7500	249	8080	249			
Total TPH		7920	249	8510	249			

BRL - Below Reporting Limit

Houston - Dallas - Midland - Tampa - Phoenix - Lubbock - San Antonio - El Paso - Atlanta - New Mexico

Jessica Vramer

eurofins Xenco

Analytical Report 667503

for

LT Environmental, Inc.

Project Manager: Dan Moir

PLU PC 17 TB 012920085 07.17.2020

Collected By: Client

1089 N Canal Street Carlsbad, NM 88220

Xenco-Houston (EPA Lab Code: TX00122): Texas (T104704215-20-36), Arizona (AZ0765), Florida (E871002-33), Louisiana (03054) Oklahoma (2019-058), North Carolina (681), Arkansas (20-035-0)

> Xenco-Dallas (EPA Lab Code: TX01468): Texas (T104704295-20-25), Arizona (AZ0809)

Xenco-El Paso (EPA Lab Code: TX00127): Texas (T104704221-20-17)
Xenco-Lubbock (EPA Lab Code: TX00139): Texas (T104704219-20-22)
Xenco-Midland (EPA Lab Code: TX00158): Texas (T104704400-19-19)
Xenco-Carlsbad (LELAP): Louisiana (05092)
Xenco-San Antonio (EPA Lab Code: TNI02385): Texas (T104704534-20-7)
Xenco Phoenix (EPA Lab Code: AZ00901): Arizona (AZ0757)
Xenco-Tampa: Florida (E87429), North Carolina (483)



07.17.2020

Project Manager: **Dan Moir LT Environmental, Inc.** 4600 W. 60th Avenue Arvada, CO 80003

Reference: Eurofins Xenco, LLC Report No(s): 667503

PLU PC 17 TB

Project Address: Eddy County

Dan Moir:

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the Eurofins Xenco, LLC Report Number(s) 667503. All results being reported under this Report Number apply to the samples analyzed and properly identified with a Laboratory ID number. Subcontracted analyses are identified in this report with either the NELAC certification number of the subcontract lab in the analyst ID field, or the complete subcontracted report attached to this report.

Unless otherwise noted in a Case Narrative, all data reported in this Analytical Report are in compliance with NELAC standards. The uncertainty of measurement associated with the results of analysis reported is available upon request. Should insufficient sample be provided to the laboratory to meet the method and NELAC Matrix Duplicate and Matrix Spike requirements, then the data will be analyzed, evaluated and reported using all other available quality control measures.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by Eurofins Xenco, LLC. This report will be filed for at least 5 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in Report No. 667503 will be filed for 45 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting Eurofins Xenco, LLC to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

Jessica Kramer

Project Manager

A Small Business and Minority Company

Houston - Dallas - Midland - Tampa - Phoenix - Lubbock - San Antonio - El Paso - Atlanta - New Mexico



Sample Cross Reference 667503

LT Environmental, Inc., Arvada, CO

PLU PC 17 TB

Sample Id	Matrix	Date Collected	Sample Depth	Lab Sample Id
BH03	S	07.16.2020 09:23	0.5 ft	667503-001
BH03A	S	07.16.2020 09:37	2 ft	667503-002

Xenco

CASE NARRATIVE

Client Name: LT Environmental, Inc.

Project Name: PLU PC 17 TB

 Project ID:
 012920085
 Report Date:
 07.17.2020

 Work Order Number(s):
 667503
 Date Received:
 07.16.2020

Sample receipt non conformances and comments:

None

Sample receipt non conformances and comments per sample:

None



Certificate of Analytical Results 667503

LT Environmental, Inc., Arvada, CO

PLU PC 17 TB

Sample Id: **BH03** Matrix: Soil Date Received:07.16.2020 17:25

Lab Sample Id: 667503-001

Date Collected: 07.16.2020 09:23

Sample Depth: 0.5 ft

Analytical Method: Chloride by EPA 300

Prep Method: E300P

Tech:

MAB

07.17.2020 13:00

% Moisture:

Analyst:

MAB Date Prep: Basis:

Wet Weight

Seq Number: 3132011

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	126	9.94	mg/kg	07.17.2020 14:57		1

Analytical Method: TPH by SW8015 Mod

Prep Method: SW8015P

Tech:

DTH

% Moisture:

Analyst: DTH Date Prep: 07.17.2020 14:30 Basis: Wet Weight

Seq Number: 3132010

Parameter	Cas Number	r Result	RL		Units	Analysis Date	Flag	Dil
Gasoline Range Hydrocarbons (GRO)	PHC610	901	249		mg/kg	07.17.2020 16:40		5
Diesel Range Organics (DRO)	C10C28DRO	6600	249		mg/kg	07.17.2020 16:40		5
Motor Oil Range Hydrocarbons (MRO)	PHCG2835	417	249		mg/kg	07.17.2020 16:40		5
Total GRO-DRO	PHC628	7500	249		mg/kg	07.17.2020 16:40		5
Total TPH	PHC635	7920	249		mg/kg	07.17.2020 16:40		5
Surrogate		Cas Number	% Recovery	Units	Limits	Analysis Date	Flag	
1-Chlorooctane		111-85-3	135	%	70-135	07.17.2020 16:40		
o-Terphenyl		84-15-1	105	%	70-135	07.17.2020 16:40		



Certificate of Analytical Results 667503

LT Environmental, Inc., Arvada, CO

PLU PC 17 TB

Sample Id: BH03 Matrix: Soil Date Received:07.16.2020 17:25

Lab Sample Id: 667503-001 Date Collected: 07.16.2020 09:23 Sample Depth: 0.5 ft

Analytical Method: BTEX by EPA 8021B Prep Method: SW5035A

Tech: MAB % Moisture:

Analyst: MAB Date Prep: 07.17.2020 10:42 Basis: Wet Weight

Seq Number: 3132013

Parameter	Cas Numbe	r Result	RL		Units	Analysis Date	Flag	Dil
Benzene	71-43-2	< 0.0998	0.0998		mg/kg	07.17.2020 15:58	U	200
Toluene	108-88-3	0.467	0.399		mg/kg	07.17.2020 15:58		200
Ethylbenzene	100-41-4	1.25	0.399		mg/kg	07.17.2020 15:58		200
m,p-Xylenes	179601-23-1	8.95	0.798		mg/kg	07.17.2020 15:58		200
o-Xylene	95-47-6	5.22	0.399		mg/kg	07.17.2020 15:58		200
Total Xylenes	1330-20-7	14.2	0.399		mg/kg	07.17.2020 15:58		200
Total BTEX		15.9	0.0998		mg/kg	07.17.2020 15:58		200
Surrogate		Cas Number	% Recovery	Units	Limits	Analysis Date	Flag	
1,4-Difluorobenzene		540-36-3	95	%	70-130	07.17.2020 15:58		
4-Bromofluorobenzene		460-00-4	105	%	70-130	07.17.2020 15:58		



Certificate of Analytical Results 667503

LT Environmental, Inc., Arvada, CO

PLU PC 17 TB

Sample Id: BH03A Matrix: Soil Date Received:07.16.2020 17:25

Lab Sample Id: 667503-002

Date Collected: 07.16.2020 09:37

Sample Depth: 2 ft

Analytical Method: Chloride by EPA 300

Prep Method: E300P

Tech: Analyst: MAB MAB

Date Prep:

% Moisture:

Seq Number: 3132011

07.17.2020 13:00

Basis:

Wet Weight

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	467	10.1	mg/kg	07.17.2020 15:14		1

Analytical Method: TPH by SW8015 Mod

Prep Method: SW8015P

Tech: Analyst: DTH DTH

Date Prep: 07.17.2020 14:30 Basis:

% Moisture:

Wet Weight

Seq Number: 3132010

Parameter	Cas Number	r Result	RL		Units	Analysis Date	Flag	Dil
Gasoline Range Hydrocarbons (GRO)	PHC610	1200	249		mg/kg	07.17.2020 16:40		5
Diesel Range Organics (DRO)	C10C28DRO	6880	249		mg/kg	07.17.2020 16:40		5
Motor Oil Range Hydrocarbons (MRO)	PHCG2835	434	249		mg/kg	07.17.2020 16:40		5
Total GRO-DRO	PHC628	8080	249		mg/kg	07.17.2020 16:40		5
Total TPH	PHC635	8510	249		mg/kg	07.17.2020 16:40		5
Surrogate		Cas Number	% Recovery	Units	Limits	Analysis Date	Flag	
1-Chlorooctane		111-85-3	132	%	70-135	07.17.2020 16:40		
o-Terphenyl		84-15-1	103	%	70-135	07.17.2020 16:40		



Certificate of Analytical Results 667503

LT Environmental, Inc., Arvada, CO

PLU PC 17 TB

Sample Id: BH03A Matrix: Soil

Date Received:07.16.2020 17:25

Lab Sample Id: 667503-002 Date Collected: 07.16.2020 09:37 Sample Depth: 2 ft

Analytical Method: BTEX by EPA 8021B

Prep Method: SW5035A

Tech: MAB % Moisture:

Analyst: MAB

Date Prep: 07.17.2020 10:42

Wet Weight Basis:

Seq Number: 3132013

Parameter	Cas Number	Result	RL		Units	Analysis Date	Flag	Dil
Benzene	71-43-2	< 0.0996	0.0996		mg/kg	07.17.2020 16:20	U	200
Toluene	108-88-3	3.00	0.398		mg/kg	07.17.2020 16:20		200
Ethylbenzene	100-41-4	5.98	0.398		mg/kg	07.17.2020 16:20		200
m,p-Xylenes	179601-23-1	56.1	0.797		mg/kg	07.17.2020 16:20		200
o-Xylene	95-47-6	15.7	0.398		mg/kg	07.17.2020 16:20		200
Total Xylenes	1330-20-7	71.8	0.398		mg/kg	07.17.2020 16:20		200
Total BTEX		80.8	0.0996		mg/kg	07.17.2020 16:20		200
Surrogate		Cas Number	% Recovery	Units	Limits	Analysis Date	Flag	
4 Deam of Ivarahangana		160 00 1	117	0/	70.120	07 17 2020 16:20		

Surrogate	Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
4-Bromofluorobenzene	460-00-4	117	%	70-130	07.17.2020 16:20	
1,4-Difluorobenzene	540-36-3	96	%	70-130	07.17.2020 16:20	



Flagging Criteria

- X In our quality control review of the data a QC deficiency was observed and flagged as noted. MS/MSD recoveries were found to be outside of the laboratory control limits due to possible matrix /chemical interference, or a concentration of target analyte high enough to affect the recovery of the spike concentration. This condition could also affect the relative percent difference in the MS/MSD.
- **B** A target analyte or common laboratory contaminant was identified in the method blank. Its presence indicates possible field or laboratory contamination.
- **D** The sample(s) were diluted due to targets detected over the highest point of the calibration curve, or due to matrix interference. Dilution factors are included in the final results. The result is from a diluted sample.
- E The data exceeds the upper calibration limit; therefore, the concentration is reported as estimated.
- F RPD exceeded lab control limits.
- J The target analyte was positively identified below the quantitation limit and above the detection limit.
- U Analyte was not detected.
- L The LCS data for this analytical batch was reported below the laboratory control limits for this analyte. The department supervisor and QA Director reviewed data. The samples were either reanalyzed or flagged as estimated concentrations.
- **H** The LCS data for this analytical batch was reported above the laboratory control limits. Supporting QC Data were reviewed by the Department Supervisor and QA Director. Data were determined to be valid for reporting.
- **K** Sample analyzed outside of recommended hold time.
- **JN** A combination of the "N" and the "J" qualifier. The analysis indicates that the analyte is "tentatively identified" and the associated numerical value may not be consistent with the amount actually present in the environmental sample.

BRL Below Reporting Limit. **ND** Not Detected.

RL Reporting Limit

MDL Method Detection Limit SDL Sample Detection Limit LOD Limit of Detection

PQL Practical Quantitation Limit MQL Method Quantitation Limit LOQ Limit of Quantitation

DL Method Detection Limit

NC Non-Calculable

SMP Client Sample BLK Method Blank

BKS/LCS Blank Spike/Laboratory Control Sample BKSD/LCSD Blank Spike Duplicate/Laboratory Control Sample Duplicate

MD/SD Method Duplicate/Sample Duplicate MS Matrix Spike MSD: Matrix Spike Duplicate

- + NELAC certification not offered for this compound.
- * (Next to analyte name or method description) = Outside XENCO's scope of NELAC accreditation

^{**} Surrogate recovered outside laboratory control limit.

Flag

Flag

B = Spike Added

D = MSD/LCSD % Rec

RPD

E300P



QC Summary 667503

LT Environmental, Inc.

PLU PC 17 TB

LCSD

E300P Analytical Method: Chloride by EPA 300 Prep Method: Seq Number: 3132011 Matrix: Solid Date Prep: 07.17.2020

7707602-1-BLK LCS Sample Id: 7707602-1-BKS LCSD Sample Id: 7707602-1-BSD MB Sample Id:

LCS MB Spike LCS Limits %RPD Units Analysis LCSD Flag **Parameter** Result Amount Result %Rec Result %Rec Limit Date Chloride <10.0 250 255 102 90-110 20 07.17.2020 14:46 266 106 4 mg/kg

Analytical Method: Chloride by EPA 300

Prep Method: Seq Number: 3132011 Matrix: Soil Date Prep: 07.17.2020 667503-001 MS Sample Id: 667503-001 S MSD Sample Id: 667503-001 SD Parent Sample Id:

Parent Spike MS MS MSD MSD Limits %RPD RPD Units Analysis **Parameter** Flag Result Amount Result %Rec %Rec Limit Date Result

07.17.2020 15:03 Chloride 126 200 335 105 330 102 90-110 2 20 mg/kg

SW8015P Analytical Method: TPH by SW8015 Mod Prep Method:

Seq Number: 3132010 Matrix: Solid Date Prep: 07.17.2020 LCS Sample Id: 7707598-1-BKS LCSD Sample Id: 7707598-1-BSD MB Sample Id: 7707598-1-BLK

Spike **RPD** MB LCS LCS %RPD Units LCSD LCSD Limits Analysis **Parameter** Result %Rec Limit Date Result Amount Result %Rec

Gasoline Range Hydrocarbons (GRO) 101 35 07.17.2020 14:31 < 50.0 1000 1010 1000 100 70-135 1 mg/kg Diesel Range Organics (DRO) < 50.0 1000 1150 115 1130 70-135 2 35 07.17.2020 14:31 113 mg/kg

MB MB LCS LCS LCSD Limits Units Analysis LCSD **Surrogate** Flag Flag Flag %Rec %Rec %Rec Date 125 07.17.2020 14:31 1-Chlorooctane 114 124 70-135 % o-Terphenyl 112 117 118 70-135 % 07.17.2020 14:31

Analytical Method: TPH by SW8015 Mod Prep Method: SW8015P

Seq Number: 3132010 Matrix: Solid Date Prep: 07.17.2020

MB Sample Id: 7707598-1-BLK

MB Units Analysis Flag **Parameter** Result Date

Motor Oil Range Hydrocarbons (MRO) 07.17.2020 14:10 < 50.0 mg/kg

SW8015P Analytical Method: TPH by SW8015 Mod Prep Method:

Seq Number: 3132010 Matrix: Soil Date Prep: 07.17.2020

MS Sample Id: 667506-001 S MSD Sample Id: 667506-001 SD Parent Sample Id: 667506-001

Spike MS MS %RPD RPD Analysis Parent MSD MSD Limits Units **Parameter** Limit Result Amount Result %Rec Date Result %Rec Gasoline Range Hydrocarbons (GRO) 07.17.2020 15:34 < 50.0 999 915 92 940 35 94 70-135 3 mg/kg 07.17.2020 15:34 102 1050 70-135 Diesel Range Organics (DRO) < 50.0 999 1020 105 3 35 mg/kg

MS MS **MSD** Units Analysis MSD Limits **Surrogate** Flag Date %Rec Flag %Rec 07.17.2020 15:34 1-Chlorooctane 118 122 70-135 % 07.17.2020 15:34 o-Terphenyl 108 110 70-135 %

MS/MSD Percent Recovery [D] = 100*(C-A) / BLCS = Laboratory Control Sample MS = Matrix Spike

RPD = 200* | (C-E) / (C+E) | [D] = 100 * (C) / [B] LCS/LCSD Recovery = MS/LCS Result Log Diff. = Log(Sample Duplicate) - Log(Original Sample) Log Difference = MSD/LCSD Result

Final 1.000

= Parent Result

Relative Percent Difference

QC Summary 667503

LT Environmental, Inc.

PLU PC 17 TB

Analytical Method: BTEX by EPA 8021B SW5035A Prep Method: Seq Number: 3132013 Matrix: Solid Date Prep: 07.17.2020 LCS Sample Id: 7707605-1-BKS MB Sample Id: 7707605-1-BLK LCSD Sample Id: 7707605-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Benzene	< 0.00200	0.100	0.112	112	0.118	118	70-130	5	35	mg/kg	07.17.2020 11:38	
Toluene	< 0.00200	0.100	0.108	108	0.114	114	70-130	5	35	mg/kg	07.17.2020 11:38	
Ethylbenzene	< 0.00200	0.100	0.103	103	0.109	109	71-129	6	35	mg/kg	07.17.2020 11:38	
m,p-Xylenes	< 0.00400	0.200	0.209	105	0.220	110	70-135	5	35	mg/kg	07.17.2020 11:38	
o-Xylene	< 0.00200	0.100	0.101	101	0.107	107	71-133	6	35	mg/kg	07.17.2020 11:38	
Surrogate	MB %Rec	MB Flag			LCS Flag	LCSI %Re			imits	Units	Analysis Date	
1,4-Difluorobenzene	98		9	19		100		70	-130	%	07.17.2020 11:38	
4-Bromofluorobenzene	99		9	8		102		70	-130	%	07.17.2020 11:38	

Analytical Method: BTEX by EPA 8021B

Prep Method: SW5035A Seq Number: 3132013 Matrix: Soil Date Prep: 07.17.2020 MS Sample Id: 667506-001 S MSD Sample Id: 667506-001 SD Parent Sample Id: 667506-001

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Benzene	< 0.00200	0.0998	0.125	125	0.121	121	70-130	3	35	mg/kg	07.17.2020 12:21	
Toluene	< 0.00200	0.0998	0.118	118	0.113	113	70-130	4	35	mg/kg	07.17.2020 12:21	
Ethylbenzene	< 0.00200	0.0998	0.110	110	0.105	105	71-129	5	35	mg/kg	07.17.2020 12:21	
m,p-Xylenes	< 0.00399	0.200	0.222	111	0.212	106	70-135	5	35	mg/kg	07.17.2020 12:21	
o-Xylene	< 0.00200	0.0998	0.108	108	0.103	103	71-133	5	35	mg/kg	07.17.2020 12:21	

Surrogate	MS %Rec	Flag	MSD %Rec	Flag	Limits	Units	Date
1,4-Difluorobenzene	100		99		70-130	%	07.17.2020 12:21
4-Bromofluorobenzene	103		98		70-130	%	07.17.2020 12:21

Date/Time

Zn

of.

Page 43 of 67

Certificate of Analysis Summary 667955

LT Environmental, Inc., Arvada, CO

Project Name: PLU PC 17 TB

Project Id:

012920085

Date Received in Lab: Wed 07.22.2020 16:32

Dan Moir **Contact:**

eurofins Environment Testing

Report Date: 07.23.2020 13:24

Eddy County Project Location:

Project Manager: Jessica Kramer

	Lab Id:	667955-00	1			
4 1 . D	Field Id:	внозв				
Analysis Requested	Depth:	3- ft				
	Matrix:	SOIL				
	Sampled:	07.17.2020 08	8:36			
BTEX by EPA 8021B	Extracted:	07.22.2020 17	7:00			
	Analyzed:	07.22.2020 22	2:17			
	Units/RL:	mg/kg	RL			
Benzene			0.00500			
Toluene			0.0200			
Ethylbenzene			0.0200			
m,p-Xylenes			0.0400			
o-Xylene		11,7	0.0200			
Total Xylenes		,,,,	0.0200			
Total BTEX	_	8.78	0.00500			
Chloride by EPA 300	Extracted:	07.22.2020 17	7:54			
	Analyzed:	07.23.2020 05	5:29			
	Units/RL:	mg/kg	RL			
Chloride		462	9.96			
TPH by SW8015 Mod	Extracted:	07.22.2020 16	6:50			
	Analyzed:	07.22.2020 19	9:20			
	Units/RL:	mg/kg	RL			
Gasoline Range Hydrocarbons (GRO)		571	50.2			
Diesel Range Organics (DRO)		4250	50.2			
Motor Oil Range Hydrocarbons (MRO)		228	50.2			
Total GRO-DRO		4820	50.2			
Total TPH		5050	50.2			

BRL - Below Reporting Limit

Houston - Dallas - Midland - Tampa - Phoenix - Lubbock - San Antonio - El Paso - Atlanta - New Mexico

Jessica Weamer



Analytical Report 667955

for

LT Environmental, Inc.

Project Manager: Dan Moir

PLU PC 17 TB 012920085 07.23.2020

Collected By: Client

1089 N Canal Street Carlsbad, NM 88220

Xenco-Houston (EPA Lab Code: TX00122): Texas (T104704215-20-36), Arizona (AZ0765), Florida (E871002-33), Louisiana (03054) Oklahoma (2019-058), North Carolina (681), Arkansas (20-035-0)

> Xenco-Dallas (EPA Lab Code: TX01468): Texas (T104704295-20-25), Arizona (AZ0809)

Xenco-El Paso (EPA Lab Code: TX00127): Texas (T104704221-20-17)
Xenco-Lubbock (EPA Lab Code: TX00139): Texas (T104704219-20-22)
Xenco-Midland (EPA Lab Code: TX00158): Texas (T104704400-19-19)
Xenco-Carlsbad (LELAP): Louisiana (05092)
Xenco-San Antonio (EPA Lab Code: TNI02385): Texas (T104704534-20-7)
Xenco Phoenix (EPA Lab Code: AZ00901): Arizona (AZ0757)
Xenco-Tampa: Florida (E87429), North Carolina (483)



07.23.2020

Project Manager: **Dan Moir LT Environmental, Inc.**4600 W. 60th Avenue
Arvada, CO 80003

Reference: Eurofins Xenco, LLC Report No(s): 667955

PLU PC 17 TB

Project Address: Eddy County

Dan Moir:

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the Eurofins Xenco, LLC Report Number(s) 667955. All results being reported under this Report Number apply to the samples analyzed and properly identified with a Laboratory ID number. Subcontracted analyses are identified in this report with either the NELAC certification number of the subcontract lab in the analyst ID field, or the complete subcontracted report attached to this report.

Unless otherwise noted in a Case Narrative, all data reported in this Analytical Report are in compliance with NELAC standards. The uncertainty of measurement associated with the results of analysis reported is available upon request. Should insufficient sample be provided to the laboratory to meet the method and NELAC Matrix Duplicate and Matrix Spike requirements, then the data will be analyzed, evaluated and reported using all other available quality control measures.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by Eurofins Xenco, LLC. This report will be filed for at least 5 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in Report No. 667955 will be filed for 45 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting Eurofins Xenco, LLC to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

Jessica Kramer

Project Manager

A Small Business and Minority Company

Houston - Dallas - Midland - Tampa - Phoenix - Lubbock - San Antonio - El Paso - Atlanta - New Mexico

Sample Cross Reference 667955

LT Environmental, Inc., Arvada, CO

PLU PC 17 TB

Sample Id	Matrix	Date Collected	Sample Depth	Lab Sample Id
ВН03В	S	07.17.2020 08:36	3 ft	667955-001

Xenco

CASE NARRATIVE

Environment Testing Client Name: LT Environmental, Inc.

Project Name: PLU PC 17 TB

Project ID: Report Date: 07.23.2020 012920085 Work Order Number(s): 667955 Date Received: 07.22.2020

Sample receipt non conformances and comments:

Sample receipt non conformances and comments per sample:

None

Certificate of Analytical Results 667955

LT Environmental, Inc., Arvada, CO

PLU PC 17 TB

Sample Id: BH03B Matrix: Soil Date Received:07.22.2020 16:32

Lab Sample Id: 667955-001

Date Collected: 07.17.2020 08:36

Sample Depth: 3 ft

Analytical Method: Chloride by EPA 300

Prep Method: E300P

Tech: MAB

% Moisture:

MAB Analyst:

Date Prep:

07.22.2020 17:54

Basis:

Wet Weight

Seq Number: 3132399

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	462	9.96	mg/kg	07.23.2020 05:29		1

Analytical Method: TPH by SW8015 Mod

Prep Method: SW8015P

DTH Tech:

% Moisture:

Analyst: DTH

Date Prep: 07.22.2020 16:50 Basis:

Wet Weight

Seq Number: 3132405

Parameter	Cas Number	r Result	RL		Units	Analysis Date	Flag	Dil
Gasoline Range Hydrocarbons (GRO)	PHC610	571	50.2		mg/kg	07.22.2020 19:20		1
Diesel Range Organics (DRO)	C10C28DRO	4250	50.2		mg/kg	07.22.2020 19:20		1
Motor Oil Range Hydrocarbons (MRO)	PHCG2835	228	50.2		mg/kg	07.22.2020 19:20		1
Total GRO-DRO	PHC628	4820	50.2		mg/kg	07.22.2020 19:20		1
Total TPH	PHC635	5050	50.2		mg/kg	07.22.2020 19:20		1
Surrogate		Cas Number	% Recovery	Units	Limits	Analysis Date	Flag	
1-Chlorooctane		111-85-3	125	%	70-135	07.22.2020 19:20		
o-Terphenyl		84-15-1	112	%	70-135	07.22.2020 19:20		

eurofins Environment Testing

Certificate of Analytical Results 667955

LT Environmental, Inc., Arvada, CO

PLU PC 17 TB

Sample Id: BH03B Matrix: Soil Date Received:07.22.2020 16:32

Lab Sample Id: 667955-001 Date Collected: 07.17.2020 08:36 Sample Depth: 3 ft

Analytical Method: BTEX by EPA 8021B Prep Method: SW5035A

Tech: MAB % Moisture:

Analyst: MAB Date Prep: 07.22.2020 17:00 Basis: Wet Weight

Seq Number: 3132403

Parameter	Cas Number	r Result	RL		Units	Analysis Date	Flag	Dil
Benzene	71-43-2	< 0.00500	0.00500		mg/kg	07.22.2020 22:17	U	1
Toluene	108-88-3	0.441	0.0200		mg/kg	07.22.2020 22:17		1
Ethylbenzene	100-41-4	0.432	0.0200		mg/kg	07.22.2020 22:17		1
m,p-Xylenes	179601-23-1	6.12	0.0400		mg/kg	07.22.2020 22:17		1
o-Xylene	95-47-6	1.79	0.0200		mg/kg	07.22.2020 22:17		1
Total Xylenes	1330-20-7	7.91	0.0200		mg/kg	07.22.2020 22:17		1
Total BTEX		8.78	0.00500		mg/kg	07.22.2020 22:17		1
Surrogate		Cas Number	% Recovery	Units	Limits	Analysis Date	Flag	
4-Bromofluorobenzene		460-00-4	130	%	70-130	07.22.2020 22:17		
1,4-Difluorobenzene		540-36-3	96	%	70-130	07.22.2020 22:17		



Flagging Criteria

- X In our quality control review of the data a QC deficiency was observed and flagged as noted. MS/MSD recoveries were found to be outside of the laboratory control limits due to possible matrix /chemical interference, or a concentration of target analyte high enough to affect the recovery of the spike concentration. This condition could also affect the relative percent difference in the MS/MSD.
- **B** A target analyte or common laboratory contaminant was identified in the method blank. Its presence indicates possible field or laboratory contamination.
- **D** The sample(s) were diluted due to targets detected over the highest point of the calibration curve, or due to matrix interference. Dilution factors are included in the final results. The result is from a diluted sample.
- E The data exceeds the upper calibration limit; therefore, the concentration is reported as estimated.
- F RPD exceeded lab control limits.
- J The target analyte was positively identified below the quantitation limit and above the detection limit.
- U Analyte was not detected.
- L The LCS data for this analytical batch was reported below the laboratory control limits for this analyte. The department supervisor and QA Director reviewed data. The samples were either reanalyzed or flagged as estimated concentrations.
- **H** The LCS data for this analytical batch was reported above the laboratory control limits. Supporting QC Data were reviewed by the Department Supervisor and QA Director. Data were determined to be valid for reporting.
- **K** Sample analyzed outside of recommended hold time.
- **JN** A combination of the "N" and the "J" qualifier. The analysis indicates that the analyte is "tentatively identified" and the associated numerical value may not be consistent with the amount actually present in the environmental sample.

BRL Below Reporting Limit. **ND** Not Detected.

RL Reporting Limit

MDL Method Detection Limit SDL Sample Detection Limit LOD Limit of Detection

PQL Practical Quantitation Limit MQL Method Quantitation Limit LOQ Limit of Quantitation

DL Method Detection Limit

NC Non-Calculable

SMP Client Sample BLK Method Blank

BKS/LCS Blank Spike/Laboratory Control Sample BKSD/LCSD Blank Spike Duplicate/Laboratory Control Sample Duplicate

MD/SD Method Duplicate/Sample Duplicate MS Matrix Spike MSD: Matrix Spike Duplicate

- + NELAC certification not offered for this compound.
- * (Next to analyte name or method description) = Outside XENCO's scope of NELAC accreditation

^{**} Surrogate recovered outside laboratory control limit.

QC Summary 667955

💸 eurofins **Environment Testing** Xenco

LT Environmental, Inc.

PLU PC 17 TB

Analytical Method: Chloride by EPA 300

Seq Number: 3132399

7707895-1-BLK

Matrix: Solid

269

E300P Prep Method: Date Prep:

07.22.2020

LCS Sample Id: 7707895-1-BKS MB Sample Id: LCS RPD Spike LCS Limits %RPD

250

Spike

201

Amount

LCSD Sample Id: 7707895-1-BSD

Limit

20

Units Analysis

Parameter Chloride

MB Result Amount

<10.0

Result

7470

Result %Rec 261

LCSD LCSD Result

%Rec 90-110 108

3

07.23.2020 02:58 mg/kg

E300P

Flag Date

Analytical Method: Chloride by EPA 300

Seq Number:

3132399

Matrix: Soil

%Rec

104

104

667904-050 S

Result

7670

Prep Method: Date Prep:

RPD

Limit

20

RPD

07.22.2020 MSD Sample Id: 667904-050 SD

Parameter

Chloride

Parent Sample Id:

667904-050 Parent MS Sample Id: MS MS

Result

7680

MSD MSD

%Rec

101

Limits %RPD

0

Units

Analysis Flag Date

07.23.2020 03:15

Analytical Method: Chloride by EPA 300

3132399

Matrix: Soil

Prep Method:

E300P

mg/kg

Seq Number: Parent Sample Id:

667904-060

MS Sample Id:

667904-060 S

Date Prep: 07.22.2020 MSD Sample Id: 667904-060 SD

Parameter

Chloride

Parent Result

Spike Amount 129

200

MS MS Result %Rec 338 105

MSD Result 338 **MSD** Limits 105 90-110

90-110

Limit 20 0

%RPD

Units

Analysis Flag Date 07.23.2020 04:33

Analytical Method: TPH by SW8015 Mod

MB Sample Id:

Seq Number:

3132405

7707899-1-BLK

LCS Sample Id: 7707899-1-BKS

Matrix: Solid

%Rec

Prep Method:

SW8015P Date Prep: 07.22.2020

mg/kg

LCSD Sample Id: 7707899-1-BSD

Parameter

Gasoline Range Hydrocarbons (GRO)

Result Amount < 50.0 1000 < 50.0 1000

MB

Spike LCS LCS Result %Rec 94 935

LCSD LCSD Limits %Rec Result

%RPD

RPD Units

Analysis Flag Date

Diesel Range Organics (DRO)

Motor Oil Range Hydrocarbons (MRO)

MB%Rec

MB Flag

1040 104 1010 1120 101 70-135 112

70-135

Limit 35 8 35

Limits

70-135

70-135

mg/kg

07.22.2020 10:11 07.22.2020 10:11

Surrogate

1-Chlorooctane

o-Terphenyl

108 122 109 110

LCS LCS Flag %Rec

LCSD

%Rec

126

118

7 LCSD

Flag

mg/kg Units

%

%

Units

mg/kg

Analysis Date

07.22.2020 10:11 07.22.2020 10:11

Analytical Method: TPH by SW8015 Mod 3132405

Matrix: Solid

Prep Method:

SW8015P

07.22.2020

Flag

Parameter

Seq Number:

MBResult < 50.0

MB Sample Id: 7707899-1-BLK

Date Prep:

Analysis Date

07.22.2020 09:50

MS/MSD Percent Recovery Relative Percent Difference

LCS/LCSD Recovery

Log Difference

[D] = 100*(C-A) / B $RPD = 200* \mid (C-E) \mid (C+E) \mid$ [D] = 100 * (C) / [B]

Log Diff. = Log(Sample Duplicate) - Log(Original Sample)

LCS = Laboratory Control Sample = Parent Result = MS/LCS Result

= MSD/LCSD Result

MS = Matrix Spike B = Spike Added D = MSD/LCSD % Rec

Flag

Flag

QC Summary 667955

LT Environmental, Inc.

PLU PC 17 TB

 Analytical Method:
 TPH by SW8015 Mod
 Prep Method:
 SW8015P

 Seq Number:
 3132405
 Matrix:
 Soil
 Date Prep:
 07.22.2020

 Parent Sample Id:
 667902-007
 MS Sample Id:
 667902-007 S
 MSD Sample Id:
 667902-007 SD

RPD **Parent** Spike MS MS Limits %RPD Units Analysis MSD MSD Flag **Parameter** Result Amount Result %Rec Result %Rec Limit Date Gasoline Range Hydrocarbons (GRO) < 50.0 1000 2 35 07.22.2020 14:42 863 86 878 88 70-135 mg/kg 07.22.2020 14:42 70-135 2 mg/kg Diesel Range Organics (DRO) < 50.0 1000 978 98 959 35 96

MSD Units Analysis MS MS MSD Limits **Surrogate** %Rec Flag Flag Date %Rec 07.22.2020 14:42 1-Chlorooctane 115 117 70-135 % 105 07.22.2020 14:42 o-Terphenyl 110 70-135 %

Analytical Method:BTEX by EPA 8021BPrep Method:SW5035ASeq Number:3132403Matrix:SolidDate Prep:07.22.2020

MB Sample Id: 7707875-1-BLK LCS Sample Id: 7707875-1-BKS LCSD Sample Id: 7707875-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date
Benzene	< 0.00200	0.100	0.115	115	0.122	122	70-130	6	35	mg/kg	07.22.2020 15:28
Toluene	< 0.00200	0.100	0.110	110	0.116	116	70-130	5	35	mg/kg	07.22.2020 15:28
Ethylbenzene	< 0.00200	0.100	0.102	102	0.108	108	71-129	6	35	mg/kg	07.22.2020 15:28
m,p-Xylenes	< 0.00400	0.200	0.206	103	0.218	109	70-135	6	35	mg/kg	07.22.2020 15:28
o-Xylene	< 0.00200	0.100	0.102	102	0.108	108	71-133	6	35	mg/kg	07.22.2020 15:28

MBMB LCS LCS LCSD Limits Units Analysis LCSD **Surrogate** %Rec Flag %Rec Flag %Rec Flag Date 07.22.2020 15:28 1,4-Difluorobenzene 101 100 100 70-130 % 07.22.2020 15:28 4-Bromofluorobenzene 102 102 70-130 % 103

Analytical Method:BTEX by EPA 8021BPrep Method:SW5035ASeq Number:3132403Matrix:SoilDate Prep:07.22.2020

667902-007 MS Sample Id: 667902-007 S MSD Sample Id: 667902-007 SD Parent Sample Id: **Parent** Spike MS MS MSD **MSD** Limits %RPD **RPD** Units Analysis

Parameter	Result	Amount	Result	%Rec	Result	%Rec			Limit		Date
Benzene	< 0.00199	0.0996	0.125	126	0.113	113	70-130	10	35	mg/kg	07.22.2020 16:32
Toluene	< 0.00199	0.0996	0.117	117	0.106	106	70-130	10	35	mg/kg	07.22.2020 16:32
Ethylbenzene	< 0.00199	0.0996	0.110	110	0.0989	99	71-129	11	35	mg/kg	07.22.2020 16:32
m,p-Xylenes	< 0.00398	0.199	0.224	113	0.200	101	70-135	11	35	mg/kg	07.22.2020 16:32
o-Xylene	< 0.00199	0.0996	0.110	110	0.0985	99	71-133	11	35	mg/kg	07.22.2020 16:32

Surrogate	MS %Rec	MS Flag	MSD %Rec	MSD Flag	Limits	Units	Analysis Date
1,4-Difluorobenzene	99		98		70-130	%	07.22.2020 16:32
4-Bromofluorobenzene	103		100		70-130	%	07.22.2020 16:32

Page 53 of 67



Chain of Custody

Work Order No: __

Houston,TX (281) 240-4200 Dallas,TX (214) 902-0300 San Antonio,TX (210) 509-3334

Midland,TX (432) 704-5440 EL Paso,TX (915) 585-3443 Lubbock,TX (806) 794-1296 Craslbad, NM (432) 704-5440

Notice: Signature of this document and relinquishment of samples or of service. Xenco will be liable only for the cost of samples and shall of sence. A minimum charge of \$75.00 will be applied to each project Relinquished by: (Signature)	FCD: (-1) Seals: Yes liftication	Project Number: 0129 2 Project Location Edd V (Sampler's Name:	Project Name: PLU P	(432)	333	Project Manager: Dan (
Notice: Signature of this document and relinquishment of samples constitutes a valid purchase order from client company to Xenco, its affiliates of Service. Xenco will be liable only for the cost of samples and shall not assume any responsibility for any losses or expenses incurred by the cost of St. Signature) Relinquished by: (Signature) Received by: (Signature)	Temp Blank: Mes No Wet Ice: Wee No Wet Ice: Wee No Thermometer ID Thermometer	Intv Rush: 24	CITTP Turn Around	236-3849 Email: 161	20+	To Domes
e B Cd Ca Cr Co Cu Fe Cr Co Cu Pb Mn Mo Ni s and subcontractors. It assigns stance client if such losses are due to circums These terms will be enforced unless p Relinquished by: (Sig 2	Number of Containers TPH (EPA 8015) X BTEX (EPA 0=80) X Chloride (EPA 300)	(Code Press, 121)	ANALYSIS REQUEST	femrthaltenv.com, chroicaltenv.com	Address: 3104 E Groons 5+	Kylo lampa
CU Fe Pb Mg Mn Mo Ni K Se Ag SiO2 Na Sr Tl Sn U V Zn Mo Ni Se Ag Tl U gns standard terms and conditions to circumstances beyond the control 1 unless previously negotiated. Ty: (Signature) Received by: (Signature) Date/Time	HNO3: HN H2S04: H2 HCL: HL NaOH: Na Zn Acetate+ NaOH: Zn TAT starts the day received by the lab, if received by 4:00pm Sample Comments	MeOH: Me None: NO		Reporting:Level III	Program: UST/PST PRP Brownfields RRC Superfund State of Project:	(561) 689-6701 www.xenco.com Page I of Work Order Comments

Eurofins Xenco, LLC

Prelogin/Nonconformance Report- Sample Log-In

Client: LT Environmental, Inc.

Acceptable Temperature Range: 0 - 6 degC

Date/ Time Received: 07.22.2020 04.32.00 PM

Air and Metal samples Acceptable Range: Ambient

Work Order #: 667955

Temperature Measuring device used: T-NM-007

	Sample Receipt Checklist		Comments
#1 *Temperature of cooler(s)?		1.4	
#2 *Shipping container in good condition?		Yes	
#3 *Samples received on ice?		Yes	
#4 *Custody Seals intact on shipping contai	ner/ cooler?	Yes	
#5 Custody Seals intact on sample bottles?		Yes	
#6*Custody Seals Signed and dated?		Yes	
#7 *Chain of Custody present?		Yes	
#8 Any missing/extra samples?		No	
#9 Chain of Custody signed when relinquish	ned/ received?	Yes	
#10 Chain of Custody agrees with sample la	abels/matrix?	Yes	
#11 Container label(s) legible and intact?		Yes	
#12 Samples in proper container/ bottle?		Yes	Samples received in bulk containers.
#13 Samples properly preserved?		Yes	oomano.
#14 Sample container(s) intact?		Yes	
#15 Sufficient sample amount for indicated	test(s)?	Yes	
#16 All samples received within hold time?		Yes	
#17 Subcontract of sample(s)?		No	
#18 Water VOC samples have zero headsp	ace?	N/A	

^{*} Must be completed for after-hours delivery of samples prior to placing in the refrigerator

Analyst:	PH Device/Lot#:
----------	-----------------

Checklist completed by: Elizabeth McClellan Date: 07.22.2020

Checklist reviewed by:

Jessica Kramer Date: <u>07.23.2020</u>

Page 55 of 67

Certificate of Analysis Summary 683873

WSP USA, Dallas, TX

Project Name: PLU PC 17

Project Id: Contact: TE012920085

Date Received in Lab: Thu 01.07.2021 16:48

Joseph Hernandez

Report Date: 02.05.2021 10:16

Project Location:

Project Manager: Jessica Kramer

	Lab Id:	683873-001			
4 1 · D	Field Id:	внозс			
Analysis Requested	Depth:	4- ft			
	Matrix:	SOIL			
	Sampled:	01.07.2021 10:30			
BTEX by EPA 8021B	Extracted:	01.07.2021 17:30			
	Analyzed:	01.08.2021 04:43			
	Units/RL:	mg/kg RI			
Benzene		0.0123 0.0099			
Toluene		0.289 0.0099			
Ethylbenzene		0.158 0.0099			
m,p-Xylenes		1.91 0.019			
o-Xylene		0.514 0.0099			
Total Xylenes		2.42 0.0099			
Total BTEX	_	2.88 0.0099	0		
Chloride by EPA 300	Extracted:	01.07.2021 18:10			
	Analyzed:	01.08.2021 08:15			
	Units/RL:	mg/kg RI			
Chloride		85.6 10.	0		
TPH by SW8015 Mod	Extracted:	01.07.2021 17:00			
	Analyzed:	01.08.2021 02:14			
	Units/RL:	mg/kg RI			
Gasoline Range Hydrocarbons (GRO)		<49.8 49.	8		
Diesel Range Organics (DRO)		575 49.	8		
Motor Oil Range Hydrocarbons (MRO)		63.7 49.	8		
Total GRO-DRO		575 49.	8		
Total TPH		639 49.	8		

BRL - Below Reporting Limit

Houston - Dallas - Midland - Tampa - Phoenix - Lubbock - San Antonio - El Paso - Atlanta - New Mexico

Jessica Wramer



Analytical Report 683873

for

WSP USA

Project Manager: Joseph Hernandez

PLU PC 17 TE012920085 02.05.2021

Collected By: Client

1089 N Canal Street Carlsbad, NM 88220

Xenco-Houston (EPA Lab Code: TX00122): Texas (T104704215-20-38), Arizona (AZ0765), Florida (E871002-33), Louisiana (03054) Oklahoma (2020-014), North Carolina (681), Arkansas (20-035-0)

> Xenco-Dallas (EPA Lab Code: TX01468): Texas (T104704295-20-26), Arizona (AZ0809)

Xenco-El Paso (EPA Lab Code: TX00127): Texas (T104704221-20-18) Xenco-Lubbock (EPA Lab Code: TX00139): Texas (T104704219-20-24) Xenco-Midland (EPA Lab Code: TX00158): Texas (T104704400-20-21) Xenco-Carlsbad (LELAP): Louisiana (05092) Xenco-San Antonio (EPA Lab Code: TNI02385): Texas (T104704534-20-8) Xenco-Tampa: Florida (E87429), North Carolina (483)



02.05.2021

Project Manager: Joseph Hernandez

WSP USA

2777 N. Stemmons Freeway, Suite 1600 Dallas, TX 75207

Reference: Eurofins Xenco, LLC Report No(s): 683873

PLU PC 17
Project Address:

Joseph Hernandez:

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the Eurofins Xenco, LLC Report Number(s) 683873. All results being reported under this Report Number apply to the samples analyzed and properly identified with a Laboratory ID number. Subcontracted analyses are identified in this report with either the NELAC certification number of the subcontract lab in the analyst ID field, or the complete subcontracted report attached to this report.

Unless otherwise noted in a Case Narrative, all data reported in this Analytical Report are in compliance with NELAC standards. The uncertainty of measurement associated with the results of analysis reported is available upon request. Should insufficient sample be provided to the laboratory to meet the method and NELAC Matrix Duplicate and Matrix Spike requirements, then the data will be analyzed, evaluated and reported using all other available quality control measures.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by Eurofins Xenco, LLC. This report will be filed for at least 5 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in Report No. 683873 will be filed for 45 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting Eurofins Xenco, LLC to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

Jessica Kramer

Project Manager

A Small Business and Minority Company

Houston - Dallas - Midland - Tampa - Phoenix - Lubbock - San Antonio - El Paso - Atlanta - New Mexico



Sample Cross Reference 683873

WSP USA, Dallas, TX

PLU PC 17

Sample Id	Matrix	Date Collected	Sample Depth	Lab Sample Id
BH03C	S	01.07.2021 10:30	4 ft	683873-001

Xenco

Environment Testing

CASE NARRATIVE

Client Name: WSP USA Project Name: PLU PC 17

 Project ID:
 TE012920085
 Report Date:
 02.05.2021

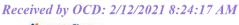
 Work Order Number(s):
 683873
 Date Received:
 01.07.2021

Sample receipt non conformances and comments:

V1.001 Revision (client email) Changed sample ID from SS03C to BH03C

Sample receipt non conformances and comments per sample:

None



eurofins **Environment Testing**

Certificate of Analytical Results 683873

WSP USA, Dallas, TX

PLU PC 17

Sample Id: BH03C Matrix: Soil Date Received:01.07.2021 16:48

Page 60 of 67

Lab Sample Id: 683873-001

Date Collected: 01.07.2021 10:30

10.0

Sample Depth: 4 ft

Prep Method: E300P

01.08.2021 08:15

Prep Method: SW8015P

Analytical Method: Chloride by EPA 300

MAB

Tech: MAB Analyst:

Seq Number: 3147128

Date Prep:

85.6

01.07.2021 18:10

% Moisture:

Basis:

mg/kg

Wet Weight

Flag

Dil

Result **Parameter** Cas Number RL Units **Analysis Date**

16887-00-6

Analytical Method: TPH by SW8015 Mod

Tech:

Analyst:

Chloride

MAB

Seq Number: 3147117

CAC

Date Prep: 01.07.2021 17:00 % Moisture:

Basis:

Wet Weight

Parameter	Cas Number	Result	RL		Units	Analysis Date	Flag	Dil
Gasoline Range Hydrocarbons (GRO)	PHC610	<49.8	49.8		mg/kg	01.08.2021 02:14	U	1
Diesel Range Organics (DRO)	C10C28DRO	575	49.8		mg/kg	01.08.2021 02:14		1
Motor Oil Range Hydrocarbons (MRO)	PHCG2835	63.7	49.8		mg/kg	01.08.2021 02:14		1
Total GRO-DRO	PHC628	575	49.8		mg/kg	01.08.2021 02:14		1
Total TPH	PHC635	639	49.8		mg/kg	01.08.2021 02:14		1
Surrogate	C	as Number	% Recovery	Units	Limits	Analysis Date	Flag	

Surrogate	Cas Number	% Recovery	Units	Limits	Analysis Date
1-Chlorooctane	111-85-3	113	%	70-135	01.08.2021 02:14
o-Terphenyl	84-15-1	104	%	70-135	01.08.2021 02:14

Wet Weight



Certificate of Analytical Results 683873

WSP USA, Dallas, TX

PLU PC 17

Sample Id: BH03C Matrix: Soil Date Received:01.07.2021 16:48

Lab Sample Id: 683873-001 Date Collected: 01.07.2021 10:30 Sample Depth: 4 ft

Analytical Method: BTEX by EPA 8021B Prep Method: SW5035A

Tech: MAB

% Moisture: Analyst: MAB Date Prep:

540-36-3

Seq Number: 3147110

1,4-Difluorobenzene

01.07.2021 17:30 Basis:

70-130

01.08.2021 04:43

Parameter	Cas Number	Result	RL		Units	Analysis Date	Flag	Dil
Benzene	71-43-2	0.0123	0.00990		mg/kg	01.08.2021 04:43		1
Toluene	108-88-3	0.289	0.00990		mg/kg	01.08.2021 04:43		1
Ethylbenzene	100-41-4	0.158	0.00990		mg/kg	01.08.2021 04:43		1
m,p-Xylenes	179601-23-1	1.91	0.0198		mg/kg	01.08.2021 04:43		1
o-Xylene	95-47-6	0.514	0.00990		mg/kg	01.08.2021 04:43		1
Total Xylenes	1330-20-7	2.42	0.00990		mg/kg	01.08.2021 04:43		1
Total BTEX		2.88	0.00990		mg/kg	01.08.2021 04:43		1
Surrogate		Cas Number	% Recovery	Units	Limits	Analysis Date	Flag	
4-Bromofluorobenzene	2	460-00-4	90	%	70-130	01.08.2021 04:43		

87



Flagging Criteria

- X In our quality control review of the data a QC deficiency was observed and flagged as noted. MS/MSD recoveries were found to be outside of the laboratory control limits due to possible matrix /chemical interference, or a concentration of target analyte high enough to affect the recovery of the spike concentration. This condition could also affect the relative percent difference in the MS/MSD.
- **B** A target analyte or common laboratory contaminant was identified in the method blank. Its presence indicates possible field or laboratory contamination.
- **D** The sample(s) were diluted due to targets detected over the highest point of the calibration curve, or due to matrix interference. Dilution factors are included in the final results. The result is from a diluted sample.
- E The data exceeds the upper calibration limit; therefore, the concentration is reported as estimated.
- F RPD exceeded lab control limits.
- J The target analyte was positively identified below the quantitation limit and above the detection limit.
- U Analyte was not detected.
- L The LCS data for this analytical batch was reported below the laboratory control limits for this analyte. The department supervisor and QA Director reviewed data. The samples were either reanalyzed or flagged as estimated concentrations.
- **H** The LCS data for this analytical batch was reported above the laboratory control limits. Supporting QC Data were reviewed by the Department Supervisor and QA Director. Data were determined to be valid for reporting.
- **K** Sample analyzed outside of recommended hold time.
- **JN** A combination of the "N" and the "J" qualifier. The analysis indicates that the analyte is "tentatively identified" and the associated numerical value may not be consistent with the amount actually present in the environmental sample.

BRL Below Reporting Limit. **ND** Not Detected.

RL Reporting Limit

MDL Method Detection Limit SDL Sample Detection Limit LOD Limit of Detection

PQL Practical Quantitation Limit MQL Method Quantitation Limit LOQ Limit of Quantitation

DL Method Detection Limit

NC Non-Calculable

SMP Client Sample BLK Method Blank

BKS/LCS Blank Spike/Laboratory Control Sample BKSD/LCSD Blank Spike Duplicate/Laboratory Control Sample Duplicate

MD/SD Method Duplicate/Sample Duplicate MS Matrix Spike MSD: Matrix Spike Duplicate

- + NELAC certification not offered for this compound.
- * (Next to analyte name or method description) = Outside XENCO's scope of NELAC accreditation

^{**} Surrogate recovered outside laboratory control limit.



WSP USA PLU PC 17

Analytical Method: Chloride by EPA 300

Seq Number: 3147128

7718710-1-BLK

Matrix: Solid

LCS Sample Id: 7718710-1-BKS

E300P Prep Method:

Date Prep: 01.07.2021

LCSD Sample Id:

7718710-1-BSD

LCS RPD MB Spike LCS Limits %RPD Units Analysis LCSD LCSD Flag **Parameter** Result Amount Result %Rec Result %Rec Limit Date

Chloride <10.0 250 247 99 98 90-110 0 20 01.08.2021 07:45 246 mg/kg

Analytical Method: Chloride by EPA 300

Seq Number: 3147128

Spike

Amount

Matrix: Soil 683825-004 S

97

Prep Method: 01.07.2021

E300P

Date Prep:

20

Prep Method:

RPD

MSD Sample Id: 683825-004 SD

Parameter

Parent Sample Id:

MB Sample Id:

683825-004 Parent Result

MS MS Result %Rec

MS Sample Id:

MSD MSD Result %Rec

212

Limits 90-110

96

97

%RPD RPD Units Limit

Analysis Date

01.08.2021 08:03

Flag

Chloride 19.9 200 213

Analytical Method: Chloride by EPA 300

Matrix: Soil

0

%RPD

E300P

Date Prep: 01.07.2021

Parent Sample Id:

Seq Number:

3147128 683825-014

MS Sample Id:

193

683825-014 S

MSD Limits MSD Sample Id: 683825-014 SD Units

mg/kg

Analysis Flag

Parameter Chloride

Parent Result Amount

Spike MS Result

199

MS %Rec 97

MSD Result %Rec

90-110

Limit 20 1

mg/kg

Date 01.08.2021 09:32

Analytical Method: TPH by SW8015 Mod

Seq Number: MB Sample Id: 3147117

<9.94

Matrix: Solid

192

Prep Method: Date Prep: SW8015P

01.07.2021

7718698-1-BLK

LCS Sample Id:

7718698-1-BKS

LCSD Sample Id: 7718698-1-BSD

MB Spike LCS LCS LCSD LCSD Limits %RPD **RPD** Units Analysis **Parameter** Result Limit Date Result Amount %Rec %Rec Result Gasoline Range Hydrocarbons (GRO) 01.07.2021 23:13 1040 35 < 50.0 1000 104 1080 108 70-135 4 mg/kg 01.07.2021 23:13 Diesel Range Organics (DRO) 70-135 10 35 < 50.0 1000 990 99 1090 109 mg/kg

LCS MBMB LCS LCSD Limits Units Analysis LCSD **Surrogate** %Rec %Rec Flag Flag Date Flag %Rec 01.07.2021 23:13 1-Chlorooctane 101 116 115 70-135 % 01.07.2021 23:13 o-Terphenyl 103 104 110 70-135 %

Analytical Method: TPH by SW8015 Mod

Seq Number: 3147117

Matrix: Solid

Prep Method: Date Prep: SW8015P

01.07.2021

MB Sample Id: 7718698-1-BLK

Parameter

MBResult

Units

Analysis

Flag

Flag

Motor Oil Range Hydrocarbons (MRO)

< 50.0

mg/kg

Date 01.07.2021 22:53

MS/MSD Percent Recovery Relative Percent Difference LCS/LCSD Recovery Log Difference

[D] = 100*(C-A) / B $RPD = 200* \mid (C-E) \mid (C+E) \mid$ [D] = 100 * (C) / [B]

Log Diff. = Log(Sample Duplicate) - Log(Original Sample)

LCS = Laboratory Control Sample = Parent Result

= MS/LCS Result = MSD/LCSD Result MS = Matrix Spike B = Spike AddedD = MSD/LCSD % Rec

Flag

683730-061 SD



WSP USA PLU PC 17

Analytical Method:TPH by SW8015 ModPrep Method:SW8015PSeq Number:3147117Matrix:SoilDate Prep:01.07.2021

Parent Sample Id: 683730-061 MS Sample Id: 683730-061 S MSD Sample Id:

RPD **Parent** Spike MS MS Limits %RPD Units Analysis MSD MSD Flag **Parameter** Result Amount Result %Rec Result %Rec Limit Date Gasoline Range Hydrocarbons (GRO) < 50.0 999 1160 1050 10 35 01.08.2021 00:14 116 105 70-135 mg/kg 01.08.2021 00:14 105 8 mg/kg Diesel Range Organics (DRO) < 50.0 999 1050 1140 70-135 35 114

MSD Units Analysis MS MS Limits MSD **Surrogate** %Rec Flag Flag Date %Rec 01.08.2021 00:14 1-Chlorooctane 112 107 70-135 % 01.08.2021 00:14 o-Terphenyl 106 118 70-135 %

Analytical Method:BTEX by EPA 8021BPrep Method:SW5035ASeq Number:3147110Matrix:SolidDate Prep:01.07.2021

 Seq Number:
 3147110
 Matrix:
 Solid
 Date Prep:
 01.07.2021

 MB Sample Id:
 7718714-1-BLK
 LCS Sample Id:
 7718714-1-BKS
 LCSD Sample Id:
 7718714-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date
Benzene	< 0.00200	0.100	0.0965	97	0.0993	99	70-130	3	35	mg/kg	01.08.2021 00:49
Toluene	< 0.00200	0.100	0.0931	93	0.0963	96	70-130	3	35	mg/kg	01.08.2021 00:49
Ethylbenzene	< 0.00200	0.100	0.0862	86	0.0886	89	71-129	3	35	mg/kg	01.08.2021 00:49
m,p-Xylenes	< 0.00400	0.200	0.176	88	0.180	90	70-135	2	35	mg/kg	01.08.2021 00:49
o-Xylene	< 0.00200	0.100	0.0878	88	0.0902	90	71-133	3	35	mg/kg	01.08.2021 00:49

MBMB LCS LCS LCSD Limits Units Analysis LCSD **Surrogate** %Rec Flag %Rec Flag %Rec Flag Date 01.08.2021 00:49 1,4-Difluorobenzene 98 94 94 70-130 % 01.08.2021 00:49 4-Bromofluorobenzene 88 87 86 70-130 %

Analytical Method:BTEX by EPA 8021BPrep Method:SW5035ASeq Number:3147110Matrix: SoilDate Prep:01.07.2021

Parent Sample Id: 683730-061 MS Sample Id: 683730-061 S MSD Sample Id: 683730-061 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Benzene	< 0.00200	0.100	0.114	114	0.106	106	70-130	7	35	mg/kg	01.08.2021 01:34	
Toluene	< 0.00200	0.100	0.110	110	0.100	100	70-130	10	35	mg/kg	01.08.2021 01:34	
Ethylbenzene	< 0.00200	0.100	0.102	102	0.0915	92	71-129	11	35	mg/kg	01.08.2021 01:34	
m,p-Xylenes	< 0.00401	0.200	0.209	105	0.188	94	70-135	11	35	mg/kg	01.08.2021 01:34	
o-Xylene	< 0.00200	0.100	0.105	105	0.0928	93	71-133	12	35	mg/kg	01.08.2021 01:34	

Surrogate	MS %Rec	MS Flag	MSD %Rec	MSD Flag	Limits	Units	Analysis Date
1,4-Difluorobenzene	94		93		70-130	%	01.08.2021 01:34
4-Bromofluorobenzene	91		86		70-130	%	01.08.2021 01:34

Chloride (EPA 300.0)

Relinquished by: (Signature)

Received by: (Signature)

ie.	5	Z (480	40) E	00 Da	(
XTO Energy	Kyle Littrell	\Z (480-355-0900) Atlanta,GA (770-449-8800) Tampa,FL (i	40) EL Paso,TX (915)585-3443 Lubbock,TX (806)794-129	00 Dallas,TX (214) 902-0300 San Antonio,TX (210) 509-33	Cham of Gastoay

Work Order Comments	Work Orde	
om Page 1 of 1	www.xenco.co	813-620-2000)
Work Order No: 68000	Work Order	34

ANALYSIS REQUEST

K Se

Ag

SiO2 Na Sr TI Sn U V

Sample Comments

TAT starts the day recevied by the lab, if received by 4:30pm

Work Order Notes

Eurofins Xenco, LLC

Prelogin/Nonconformance Report- Sample Log-In

Client: WSP USA

Acceptable Temperature Range: 0 - 6 degC

Date/ Time Received: 01.07.2021 04.48.00 PM Air and Metal samples Acceptable Range: Ambient

Work Order #: 683873 Temperature Measuring device used : T_NM_007

	Sample Receipt Checklist		Comments
#1 *Temperature of cooler(s)?		.4	
#2 *Shipping container in good condition?		Yes	
#3 *Samples received on ice?		Yes	
#4 *Custody Seals intact on shipping contain	ner/ cooler?	Yes	
#5 Custody Seals intact on sample bottles?		Yes	
#6*Custody Seals Signed and dated?		Yes	
#7 *Chain of Custody present?		Yes	
#8 Any missing/extra samples?		No	
#9 Chain of Custody signed when relinquish	ned/ received?	Yes	
#10 Chain of Custody agrees with sample la	abels/matrix?	Yes	
#11 Container label(s) legible and intact?		Yes	
#12 Samples in proper container/ bottle?		Yes	Samples received in bulk containers.
#13 Samples properly preserved?		Yes	
#14 Sample container(s) intact?		Yes	
#15 Sufficient sample amount for indicated	test(s)?	Yes	
#16 All samples received within hold time?		Yes	
#17 Subcontract of sample(s)?		No	
#18 Water VOC samples have zero headsp	ace?	N/A	

* Must be completed for	after-hours deliver	v of samples prior t	o placing in the	refrigerator
Must be combleted for	alter-mours acriver	V OI SAIIIDIGS DITOI I	o biacilia ili tile	i eli idei atoi

Checklist completed by:	Close afth	Date: 01.07.2021
	Cloe Clifton	
Checklist reviewed by:	Jessica Vramer	
_		Date: 01.08.2021
	Jessica Kramer	

PH Device/Lot#:

Analyst:

District I
1625 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720 District II

811 S. First St., Artesia, NM 88210 Phone: (575) 748-1283 Fax: (575) 748-9720 District III

1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. **Santa Fe, NM 87505**

CONDITIONS

Action 17910

CONDITIONS

Operator:	OGRID:
XTO ENERGY, INC	5380
6401 Holiday Hill Road	Action Number:
Midland, TX 79707	17910
Γ.	Action Type:
	[C-141] Release Corrective Action (C-141)

CONDITIONS

-	d Condition	Condition
Ву		Date
rhaml	t XTO's deferral requests to complete final remediation during any future major construction/alteration or final plugging and abandonment, whichever occurs first. WSP and XTO do not believe deferment will result in imminent risk to human health, the environment, or groundwater. The areas requested for deferral are identified on the site map as "BH01", "BH02", and "BH03". The	6/30/2021
	areas have been delineated and documented in the report. At this time, OCD approves this request. The Deferral Request and C-141 will be accepted for record and marked accordingly. The release will remain open in OCD database files and reflect an open environmental issue. This is a Federal site and will require like approval from BLM.	
	Telease will remain open in OCD database lifes and reflect an open environmental issue. This is a rederal site and will require like approval from DEM.	