

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

## NM OIL CONSERVATION

ARTESIA DISTRICT

Form C-141  
Revised August 8, 2011

DEC 19 2016  
Submit to appropriate District Office in accordance with 19.15.29 NMAC.

RECEIVED

## Release Notification and Corrective Action

NAB 11635451725 OPERATOR ☒ Initial Report ☐ Final Report

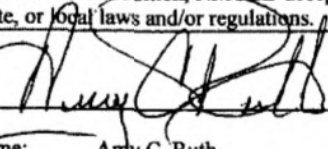
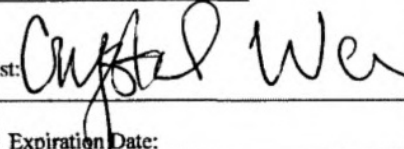
Name of Company: BOPCO, L.P. <u>240737</u>	Contact: Amy Ruth
Address: 522 W. Mermod, Suite 704 Carlsbad, N.M. 88220	Telephone No. 575-887-7329
Facility Name: JRU 29 SWD Battery at JRU well #29	Facility Type: Exploration and Production
Surface Owner: State of New Mexico	Mineral Owner: State of New Mexico
API No. 30-015-27735	

## LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
K	36	22S	30E	1845	South	2160	West	Eddy

Latitude 32.346427° Longitude -103.835871°

## NATURE OF RELEASE

Type of Release	Produced Water	Volume of Release	3324 bbls	Volume Recovered	2990 bbls
Source of Release	Water transfer pump	Date and Hour of Occurrence	Unknown	Date and Hour of Discovery	12/1/2016 approx. 9 am
Was Immediate Notice Given?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	Mike Bratcher and Heather Patterson (NMOCD)		
By Whom?	Amy Ruth	Date and Hour	12/1/2016 4:52 pm		
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	N/A		
If a Watercourse was Impacted, Describe Fully.* N/A					
Describe Cause of Problem and Remedial Action Taken.* Release was due to a water transfer pump failure resulting in damage to pump fiberglass line. Fluids overflowed containment. Pump was isolated for repair.					
Describe Area Affected and Cleanup Action Taken.* The leak affected 56,043 square feet (33,938 square feet of this is in pasture). Standing fluids were recovered from the ground. Saturated surface soils were scraped and stockpiled on bermed plastic located on the caliche pad.					
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.					
Signature: 		OIL CONSERVATION DIVISION			
Printed Name: Amy C. Ruth		Approved by Environmental Specialist: 			
Title: EHS Environmental Supervisor		Approval Date:		Expiration Date:	
E-mail Address: ACRuth@basspet.com		Conditions of Approval: <u>see attached</u>		Attached <input checked="" type="checkbox"/>	
Date: 12/16/2016		Phone: 432-661-0571			

\* Attach Additional Sheets If Necessary

2RP-4040

District I  
1625 N. French Dr., Hobbs, NM 88240  
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State of New Mexico  
Energy Minerals and Natural  
Resources Department  
  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

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

Incident ID	NAB1635656725
District RP	2RP-4040
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party: XTO Energy, Inc	OGRID: 5380
Contact Name: Kyle Littrell	Contact Telephone: (432)-221-7331
Contact email: Kyle_Littrell@xtoenergy.com	Incident #: 2RP-4040
Contact mailing address: 522 W. Mermod, Suite 704 Carlsbad, NM 88220	

### Location of Release Source

Latitude 32.346427 Longitude -103.835871  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name JRU 29 SWD Battery at JRU well #29	Site Type Exploration and Production
Date Release Discovered 12/1/2016	API# (if applicable) 30-015-27735

Unit Letter	Section	Township	Range	County
K	36	22S	30E	Eddy

Surface Owner: ☒ State ☐ Federal ☐ Tribal ☐ 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)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 3,324 bbls	Volume Recovered (bbls) 2,990 bbls
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

#### Cause of Release

Release was due to a water transfer pump failure resulting in damage to pump fiberglass line. Fluids overflowed containment. Pump was isolated for repair.

Incident ID	NAB1635656725
District RP	2RP-4040
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC?  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? Release volume was greater than 25 bbls.
If YES, was immediate notice given to the OCD? Yes, immediate notice was given to Mike Bratcher and Heather Patterson of NMOCD by Amy Ruth on 12/01/2016 at 4:52pm.	

## Initial Response

*The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury*

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why:	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
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: <u>Kyle Littrell</u>	Title: <u>SH&amp;E Supervisor</u>
Signature: _____	Date: <u>4-28-2020</u>
email: <u>Kyle.Littrell@xtoenergy.com</u>	Telephone: <u>432-221-7331</u>
<b><u>OCD Only</u></b>	
Received by: _____	Date: _____

Incident ID	NAB1635656725
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## 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?	<u>&gt; 100</u> (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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
- ☒ Topographic/Aerial maps
- ☒ Laboratory data including chain of custody

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.



State of New Mexico  
Oil Conservation Division

Incident ID	NAB1635656725
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Printed Name: Garrett Green Title: SH&E Coordinator

Signature:  Date: 8/22/2022

email: Garrett.Green@exxonmobil.com Telephone: 575-200-0729

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Incident ID	NAB1635656725
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Application ID	

## Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

**Closure Report Attachment Checklist:** *Each of the following items must be included in the closure report.*

- ☒ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☒ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☒ Laboratory analyses of final sampling (Note: appropriate OCD District office must be notified 2 days prior to final sampling)
- ☒ Description of remediation activities

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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Garrett Green Title: SH&E Coordinator

Signature:  Date: 8/22/2022

email: Garrett.Green@exxonmobil.com Telephone: 575-200-0729

### OCD Only

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_



LT Environmental, Inc.

3300 North "A" Street  
Building 1, Unit 103  
Midland, Texas 79705  
432.704.5178

April 30, 2020

Mr. Bradford Billings  
New Mexico Oil Conservation Division  
1220 South St. Francis Drive, #3  
Santa Fe, New Mexico 87505

**RE: Closure Request  
James Ranch Unit 29 SWD Tank Battery  
Remediation Permit Number 2RP-3082, 2RP-3302, 2RP-3726, and 2RP-4040  
Eddy County, New Mexico**

Dear Mr. Billings:

LT Environmental, Inc. (LTE), on behalf of XTO Energy, Inc. (XTO), presents the following Closure Request report detailing site assessment, soil sampling, and excavation activities at the James Ranch Unit (JRU) 29 SWD Tank Battery (Site) in Unit K, Section 36, Township 22 South, Range 30 East, in Eddy County, New Mexico (Figure 1). The purpose of the site assessment, soil sampling, and excavation activities was to address impacts to soil after multiple historical releases of produced water at the Site.

The releases are included in the Compliance Agreement for Remediation for Historical Releases (Compliance Agreement) between XTO and the New Mexico Oil Conservation Division (NMOCD) effective November 13, 2018. The purpose of the Compliance Agreement is to ensure reportable releases that occurred prior to August 14, 2018, where XTO is responsible for the corrective action, comply with Title 19, Chapter 15, Part 29 (19.15.29) of the New Mexico Administrative Code (NMAC) as amended on August 14, 2018. The releases are categorized as Tier IV sites in the Compliance Agreement, meaning the releases occurred prior to August 14, 2018, the effective date of 19.15.29 NMAC; however, remediation was ongoing. Based on the site assessment activities and results of the soil sampling events, XTO is requesting no further action for these release events.

## **RELEASE BACKGROUND**

Between June 22, 2015 and December 1, 2016, four separate events resulted in the release of 4,499 barrels (bbls) of produced water at the Site. A total of approximately 4,030 bbls of free-standing fluids were recovered using a vacuum truck. The produced water releases impacted the caliche pad and pasture areas to the south and west of the pad. The previous operator reported each release to the NMOCD on a Release Notification and Corrective Action Form C-141. Remediation Permit (RP) Numbers 2RP-3082, 2RP-3302, 2RP-3726, and 2RP-4040 were assigned to the releases. Additional details regarding each release event are provided on the Form C-141s which are included in Attachment 1.



A Closure Request for the on-pad impacts was submitted in April 2019 under RP Numbers 2RP-2726 and 2RP-4833. This Closure Request is addressing the release areas in the pasture south and west of the pad associated with RP Numbers 2RP-3082, 2RP-3302, 2RP-3726, and 2RP-4040.

## SITE CHARACTERIZATION

LTE characterized the Site according to Table 1, *Closure Criteria for Soils Impacted by a Release*, of 19.15.29.12 of the NMAC. Depth to groundwater at the Site is estimated to be greater than 100 feet below ground surface (bgs) based on the nearest water well data. The nearest permitted water well with depth to water data is United States Geological Survey (USGS) Well 321946103492001, located approximately 6,641 feet southeast of the Site. The water well has a depth to groundwater of 144 feet and a total depth of 180 feet. Ground surface elevation at the water well location is 3,305 feet above mean sea level (AMSL), which is approximately 8 feet lower in elevation than the Site. The closest continuously flowing water or significant watercourse to the Site is an intermittent stream located approximately 5,300 feet southwest of the Site. The Site is greater than 200 feet from a lakebed, sinkhole, or playa lake and greater than 300 feet from an occupied residence, school, hospital, institution, church, or wetland. The Site is greater than 1,000 feet to a freshwater well or spring and is not within a 100-year floodplain or overlying a subsurface mine. The Site is located in a medium-potential karst area.

During January 2020, a soil boring was advanced at the Site to a depth of 110 feet bgs via truck-mounted sonic drill rig to confirm depth to water in the area. An LTE geologist logged and described soils continuously. The borehole lithologic/soil sampling log is included in Attachment 4. The borehole was left open for over 72 hours to allow for potential slow infill of groundwater. After the 72-hour waiting period without observing groundwater, it was confirmed that groundwater beneath the Site is greater than 110 feet. The borehole was properly abandoned with hydrated bentonite chips.

## CLOSURE CRITERIA

Based on the results of the Site Characterization, the following NMOCD Table 1 Closure Criteria (Closure Criteria) apply:

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





Billings, B.  
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A closure criteria of 600 mg/kg chloride was applied to the top 4 feet the pasture area that was impacted by the release, per NMAC 19.15.29.13.D (1) for the top 4 feet of areas that will be reclaimed following remediation.

## HISTORICAL REMEDIATION ACTIVITIES

During September 2017, Basin Environmental Service Technologies (Basin), completed preliminary site assessment activities at the Site. Test trenches were advanced via trackhoe at seven locations (SP-1 through SP-7) within the release areas to delineate impacted soil resulting from the historical produced water releases. On December 17, 2017, Basin submitted a Corrective Action Plan (CAP) to the NMOCD to propose remediation actions based on the results of the preliminary assessment activities. The CAP proposed the following remediation actions:

- Continued vertical delineation of chloride to below 600 mg/kg at test trench locations SP-4 and SP-7 (vertical delineation of chloride to below 600 mg/kg was achieved at all other test trench locations).
- Excavation of impacted pasture soils to a depth of four feet bgs and installation of a 20-mil impermeable liner over the in-situ soil.
- A liner from a prior remediation effort was identified at test trench SP-4. The existing liner in this area will be removed and replaced with a new liner.
- Excavation of impacted soil on the pad to a depth of approximately one-foot bgs.
  - As indicated above, the on-pad release areas were addressed in a separate Closure Request submitted in April 2019 under RP Numbers 2RP-2726 and 2RP-4833 (test trenches SP-1, SP-2, and SP-3 were completed on-pad and are not discussed further in this report).

NMOCD approved the CAP via email on March 9, 2018 with the following conditions:

- The vertical delineation sampling at SP-4 and SP7 must be completed at 1-foot intervals and analyzed for BTEX, TPH, and chloride.
- Complete an additional sampling point between existing test trench SP-5 and SP-7 and if practicable, directly south of the battery.

Basin completed the following remediation activities during March and April 2018:

- Removed the existing liner at test trench SP-4 and completed vertical delineation of chlorides to below 600 mg/kg at test trench SP-4.
- Attempted vertical delineation of chlorides at test trench SP-7. Chloride concentrations exceeded 600 mg/kg at 23 feet bgs (maximum reach of the trackhoe).
- Completed additional test trenches SP-8 and SP-9 and achieved vertical delineation of chlorides to below 600 mg/kg.



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- Replaced the liner in the area around test trench SP-4.
- Excavated pasture soils to a depth of 4 feet bgs.
- Collected confirmation soil samples from the sidewalls of the excavation from a depth of 2 feet bgs.

Excavation of the impacted soil was conducted prior to the Compliance Agreement and prior to the implementation of the August 14, 2018, NMOCD modification to 19.15.29. Excavation confirmation samples were collected as discrete samples instead of composite samples. The sampling protocol complied with Guidance on Choosing a Sampling Design for Environmental Data Collection for Use in Developing a Quality Assurance Project Plan, EPA QA/G-5S, December 2002. The excavation extent and excavation soil sample locations are depicted on Figure 2.

Basin is no longer in operation and the remaining remediation activities were not completed. The available documentation from Basin is provided in Attachment 2. Documentation includes the CAP, correspondence with NMOCD, site maps, and soil sample laboratory analytical results.

### **ADDITIONAL SITE ASSESSMENT AND EXCAVATION ACTIVITIES**

During January 2020, LTE personnel was at the Site to complete the remaining remediation activities. A truck-mounted sonic drill rig was used to complete the NMOCD required vertical delineation at test trench SP-7. Soil samples SP-11/SP-11A/SP-11B/SP-11C were collected at 1-foot intervals from 23 feet to 26 feet bgs at the SP-7 test trench location. Additionally, per NMOCD request, an additional sampling point (SP-12) was selected between test trench SP-5 and SP-7. Soil samples were collected at 1-foot intervals from SP-12 from depths ranging from 4 feet to 14 feet bgs. The NMOCD request to add a sampling point south of the tank battery could not be completed to due multiple pipelines in this area. Soil from the boreholes was field screened for volatile aromatic hydrocarbons and chloride utilizing a calibrated photoionization detector (PID) and Hach® chloride QuanTab® test strips, respectively. Field screening results and observations for the boreholes were logged on lithologic/soil sampling logs, which are included in Attachment 4. The delineation soil sample locations are depicted on Figure 3.

The CAP and initial remediation activities were completed prior to the August 14, 2018 modification to 19.15.29 of the NMAC. LTE evaluated the remaining remediation activities required, based on the implementation of the modification and associated NMOCD Table 1 Closure Criteria.

Two test trench delineation soil samples exceeded the Closure Criteria for GRO/DRO:

- The sample collected from 3 feet bgs from test trench SP-4 exceeded the Closure Criteria for GRO/DRO. The 3-foot sample was collected from above the liner and was subsequently excavated.



Billings, B.  
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- The sample collected from 5 feet bgs from test trench SP-7 exceeded the Closure Criteria for GRO/DRO; the subsequent 6-foot bgs from test trench SP-7 was compliant. Soil was excavated in the area around SP-7 to a depth of 5.5 feet bgs. Following removal of impacted soil, LTE collected a 5-point composite soil sample (FS01) from the floor of the excavation from a depth of 5.5 feet bgs. The excavation extent and excavation soil sample location are depicted on Figure 2.

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

Based on depth to groundwater greater than 100 feet bgs and laboratory analytical results below the Closure Criteria in all remaining delineation and excavation soil samples, liner installation was not warranted in the excavation area south of the pad. Impacted soil was excavated to a depth of four feet bgs from the entire pasture release area and vertical delineation of chlorides to below 600 mg/kg was completed at every test trench/delineation sample point.

The excavation measured approximately 33,300 square feet in area and was completed to a depth of 4 feet bgs. A total of approximately 5,000 cubic yards of impacted soil were removed from the excavation. Photographic documentation was conducted during the Site visits. Photographs are included in Attachment 4.

## ANALYTICAL RESULTS

Laboratory analytical results for the delineation soil samples, collected from sample points SP-4 through SP-12 indicated that BTEX, GRO/DRO, TPH, and chloride concentrations were compliant with the Closure Criteria except for two samples (SP-4 at 3 feet bgs and SP-7 at 5 feet bgs) that exceeded for GRO/DRO, and were subsequently excavated. Laboratory analytical results for the delineation soil samples are summarized in Table 1.

Laboratory analytical results for the excavation soil samples indicated that BTEX, GRO/DRO, TPH, and chloride concentrations were compliant with the Closure Criteria and chloride concentrations were below 600 mg/kg in sidewall samples collected from the pasture excavation from the top 4 feet of the subsurface. Laboratory analytical results for the excavation soil samples are summarized in Table 2. The complete laboratory analytical reports are included as Attachment 5.

Billings, B.  
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## CLOSURE REQUEST

Site assessment and excavation activities were conducted at the Site to address the historical releases of produced water in the pasture areas south and west of the well pad. Delineation soil sampling was completed in and around the release extents to define the lateral and vertical extent of impacted soil. Impacted soil was excavated from the pasture release areas to a depth of 4 feet bgs. Laboratory analytical results for excavation soil samples, collected from the final excavation extent, indicated that BTEX, GRO/DRO, TPH, and chloride concentrations were compliant with the Closure Criteria. Additionally, chloride concentrations were below 600 mg/kg in excavation soil samples collected in the pasture from the top four feet of the subsurface. Laboratory analytical results for the final delineation soil samples, collected from sample points SP-4 through SP-12 indicated that BTEX, GRO/DRO, TPH, and chloride concentrations were compliant with the Closure Criteria at depths below 4 feet bgs and no further excavation was required. A historical liner was identified in the area around sample point SP-4. The liner in this area was replaced per the CAP to be protective of historical remediation activities at the Site.

Initial response efforts, natural attenuation, and excavation of impacted soil have mitigated impacts at this Site. XTO requests no further action for RP Numbers 2RP-3082, 2RP-3302, 2RP-3726, and 2RP-4040. XTO backfilled the excavation with material purchased locally and recontoured the Site to match pre-existing site conditions. An updated NMOCD Form C-141 for each release event is included in Attachment 1.

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

Sincerely,

LT ENVIRONMENTAL, INC.

A handwritten signature in black ink that reads 'Aimee Cole'.

Aimee Cole  
Project Environmental Scientist

A handwritten signature in black ink that reads 'Ashley L. Ager'.

Ashley L. Ager, P.G.  
Senior Geologist

cc: Kyle Littrell, XTO  
Ryan Mann, State Land Office  
Mike Bratcher, NMOCD





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Attachments:

- Figure 1 Site Location Map
- Figure 2 Excavation Soil Sample Locations
- Figure 3 Delineation Soil Sample Locations
- Table 1 Delineation Soil Sample Analytical Results
- Table 2 Excavation Soil Sample Analytical Results
- Attachment 1 Initial/Final NMOC Form C-141 (2RP-3082, 2RP-3302, 2RP-3726, and 2RP-4040)
- Attachment 2 Historical Documentation
- Attachment 3 Lithologic / Soil Sample Logs
- Attachment 4 Photographic Log
- Attachment 5 Laboratory Analytical Reports

FIGURES



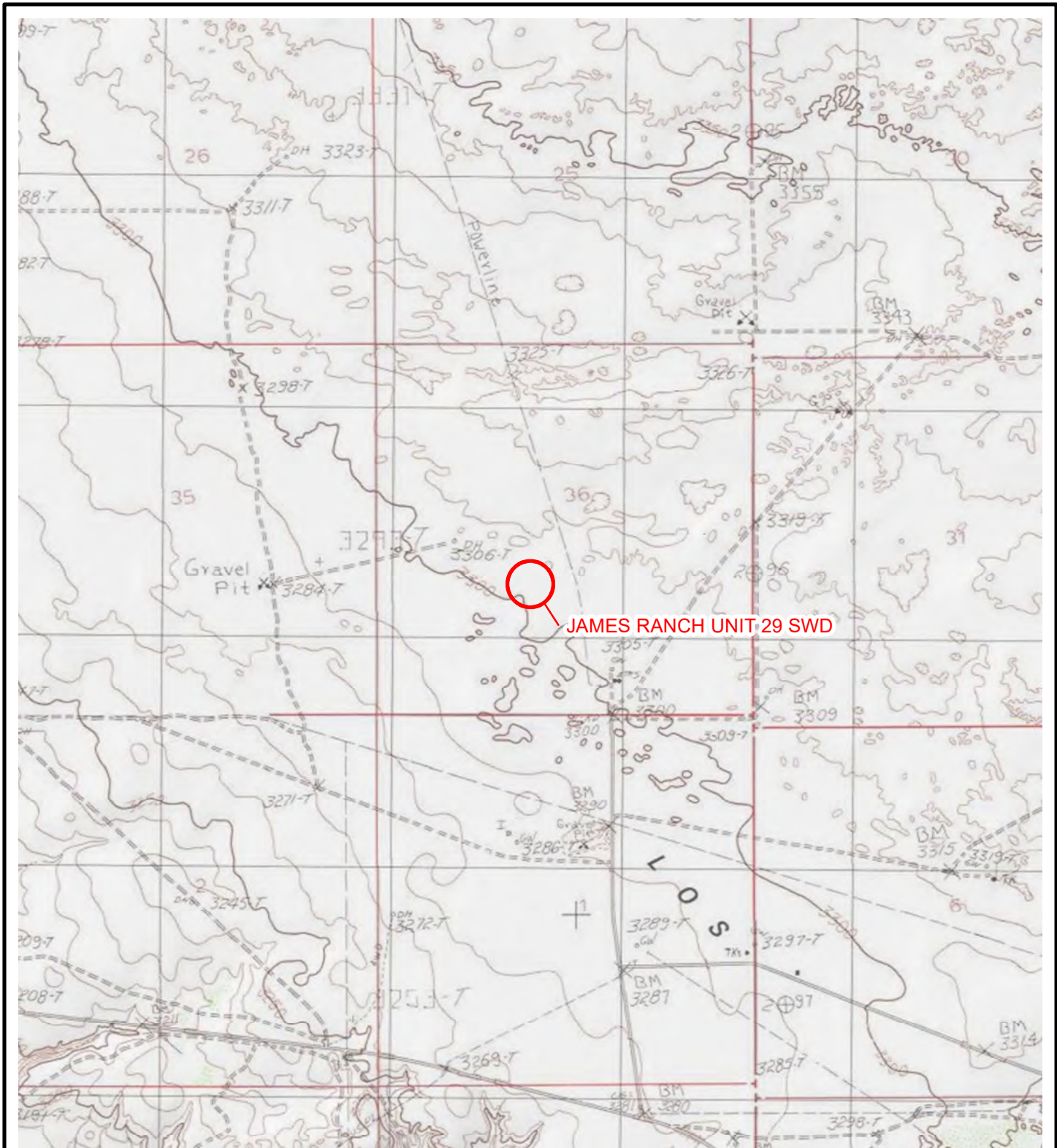
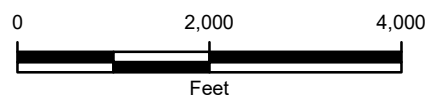


IMAGE COURTESY OF ESRI/USGS

**LEGEND**

○ SITE LOCATION



NOTE: REMEDIATION PERMIT  
NUMBERS 2RP-2726, 2RP-3082,  
2RP-3302, 2RP-3726,  
2RP-4040, & 2RP-4833

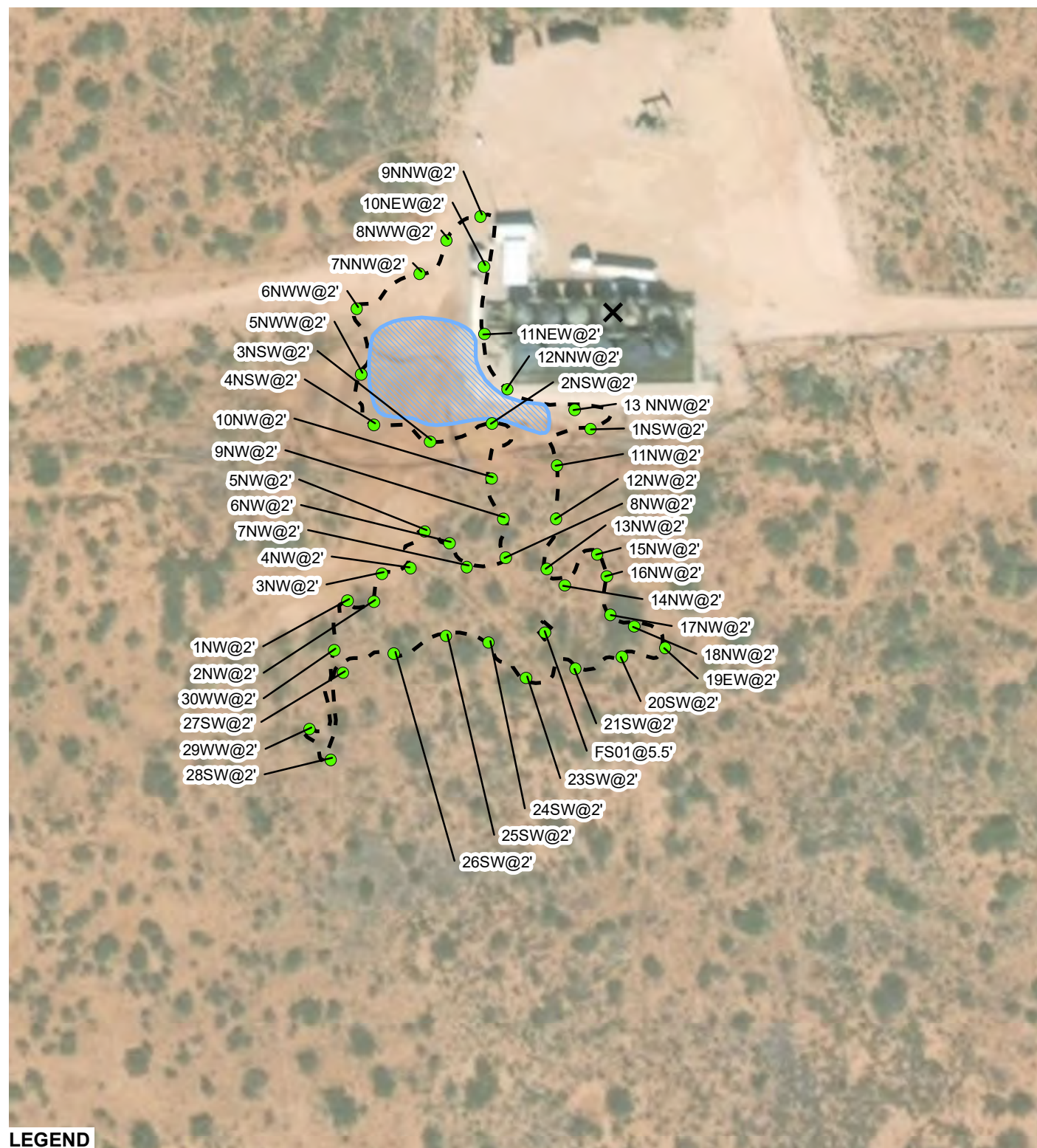


**FIGURE 1**  
**SITE LOCATION MAP**  
**JAMES RANCH UNIT 29 SWD**  
**UNIT K SEC 36 T22S R30E**  
**EDDY COUNTY, NEW MEXICO**  
**XTO ENERGY, INC.**



P:\XTO Energy\GIS\MXD\012918135\_JAMES RANCH UNIT 29 SWD BATTERY\_4833012918135\_FIG01\_SL\_2019.mxd



**LEGEND**

RELEASE LOCATION

EXCAVATION SOIL SAMPLE IN COMPLIANCE  
WITH APPLICABLE CLOSURE CRITERIA

EXCAVATION EXTENT (4 FEET)

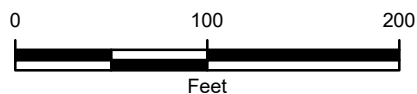


APPROXIMATE LINER EXTENT

NOTE: REMEDIATION PERMIT NUMBERS  
2RP-2726, 2RP-3082, 2RP-3302, 2RP-3726,  
2RP-4040, & 2RP-4833

SAMPLE ID@DEPTH BELOW GROUND SURFACE (FEET)

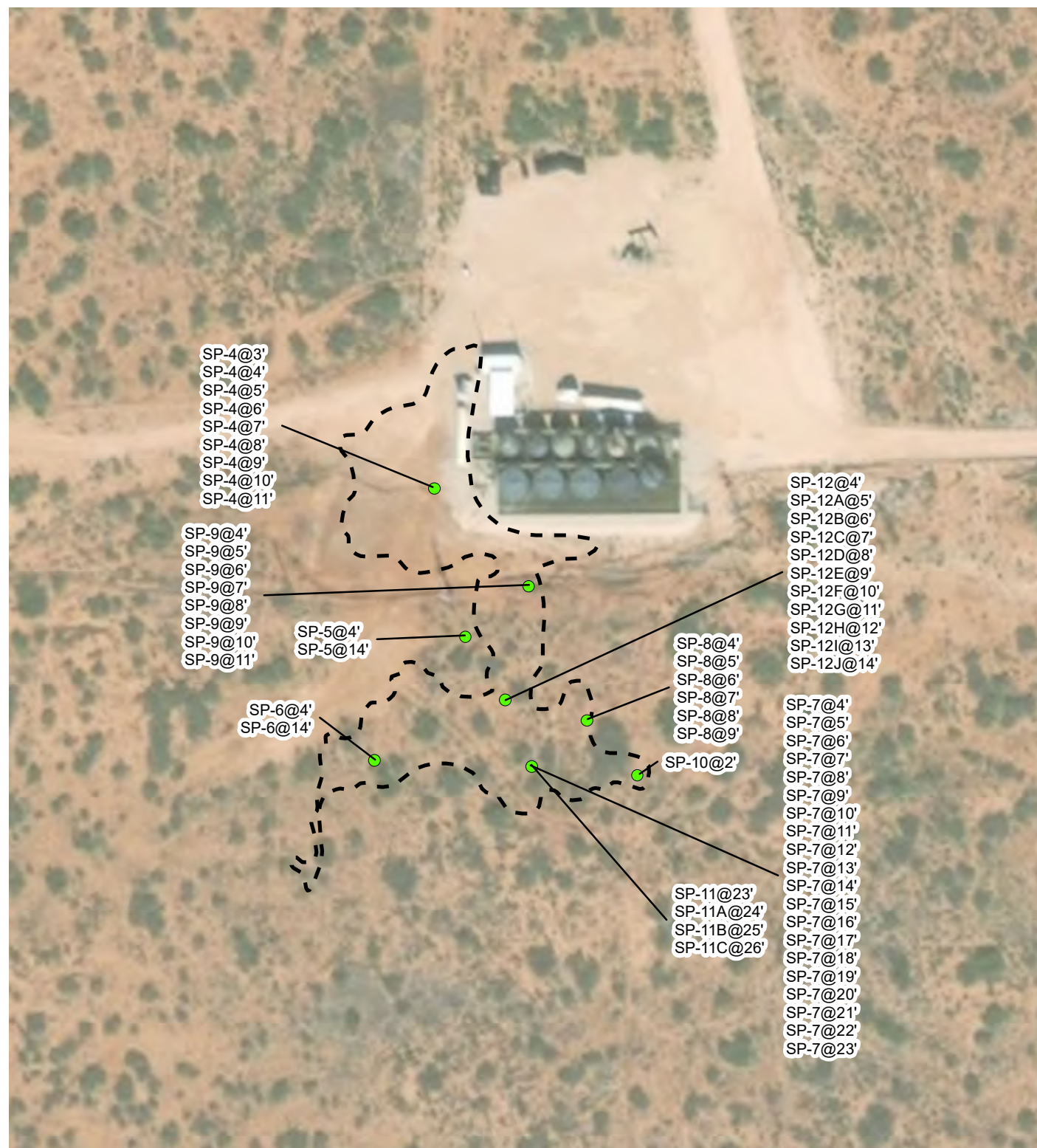
IMAGE COURTESY OF ESRI



**FIGURE 2**  
**EXCAVATION SOIL SAMPLE LOCATIONS**  
JAMES RANCH UNIT 29 SWD  
UNIT K SEC 36 T22S R30E  
EDDY COUNTY, NEW MEXICO  
**XTO ENERGY, INC.**

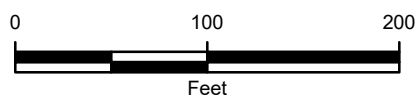




**LEGEND**

- DELINEATION SOIL SAMPLE IN COMPLIANCE WITH APPLICABLE CLOSURE CRITERIA
- EXCAVATION EXTENT (4 FEET)

IMAGE COURTESY OF ESRI



NOTE: REMEDIATION PERMIT NUMBERS  
2RP-2726, 2RP-3082, 2RP-3302, 2RP-3726,  
2RP-4040, & 2RP-4833  
SAMPLE ID@DEPTH BELOW GROUND SURFACE (FEET)

**FIGURE 3**  
**DELINEATION SOIL SAMPLE LOCATIONS**  
**JAMES RANCH UNIT 29 SWD**  
**UNIT K SEC 36 T22S R30E**  
**EDDY COUNTY, NEW MEXICO**  
**XTO ENERGY, INC.**



TABLES



**TABLE 1**  
**SOIL ANALYTICAL RESULTS**  
**JRU 29 SWD TANK BATTERY**  
**REMEDIATION PERMIT NUMBER 2RP-3082, 2RP-3302, 2RP-3726, 2RP-4040**  
**EDDY COUNTY, NEW MEXICO**  
**XTO ENERGY, INC.**

Sample Name	Sample Depth (feet bgs)	Sample Date	Benzene (mg/kg)	Toluene (mg/kg)	Ethyl-benzene (mg/kg)	Total Xylenes (mg/kg)	Total BTEX (mg/kg)	GRO (mg/kg)	DRO (mg/kg)	ORO (mg/kg)	Total GRO+DRO (mg/kg)	TPH (mg/kg)	Chloride (mg/kg)
SP-4	3	09/11/2017	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	2,130	489	2,130	2,130	2,720
SP-4	4	04/16/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	13.3	<10.0	13.3	4,800
SP-4	5	04/16/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	1,600
SP-4	6	04/16/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	1,410
SP-4	7	04/16/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	1,440
SP-4	8	04/16/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	1,040
SP-4	9	04/16/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	1,800
SP-4	10	04/16/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	608
SP-4	11	04/16/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	528
SP-5	4	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	288
SP-5	14	09/11/2017	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	240
SP-6	4	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	529
SP-6	14	09/11/2017	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	64.0
SP-7	4	03/29/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	469	130	469	599	10,400
SP-7	5	03/29/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	1,140	248	1,140	1,388	10,800
SP-7	6	03/29/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	8,130
SP-7	7	03/29/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	14,400
SP-7	8	03/29/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	15,600
SP-7	9	03/29/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	10,700
SP-7	10	03/29/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	3,440
SP-7	11	03/29/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	3,520
SP-7	12	03/29/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	656
SP-7	13	03/29/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	1,200
SP-7	14	03/29/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	1,120
SP-7	14	03/29/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	1,760
SP-7	15	03/29/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	304
SP-7	16	03/29/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	880
SP-7	17	03/29/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	816
SP-7	18	03/29/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	1,360
SP-7	19	03/29/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	2,360
SP-7	20	03/29/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	1,600
SP-7	21	03/29/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	1,440
SP-7	22	03/29/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	4,880
SP-7	23	03/29/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	2,360
SP-11	23	01/21/2020	<0.00199	<0.00199	<0.00199	<0.00199	<0.00199	<50.0	<50.0	<50.0	<50.0	<50.0	32.9
SP-11A	24	01/21/2020	<0.00198	<0.00198	<0.00198	<0.00198	<0.00198	<49.8	<49.8	<49.8	<49.8	<49.8	157
SP-11B	25	01/21/2020	<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	<50.0	<50.0	<50.0	<50.0	<50.0	289
SP-11C	26	01/21/2020	<0.00201	<0.00201	<0.00201	<0.00201	<0.00201	<50.0	<50.0	<50.0	<50.0	<50.0	216
NMOCD Table 1 Closure Criteria			10	NE	NE	NE	50	NE	NE	NE	1,000	2,500	20,000

**TABLE 1**  
**SOIL ANALYTICAL RESULTS**  
**JRU 29 SWD TANK BATTERY**  
**REMEDIATION PERMIT NUMBER 2RP-3082, 2RP-3302, 2RP-3726, 2RP-4040**  
**EDDY COUNTY, NEW MEXICO**  
**XTO ENERGY, INC.**

Sample Name	Sample Depth (feet bgs)	Sample Date	Benzene (mg/kg)	Toluene (mg/kg)	Ethyl-benzene (mg/kg)	Total Xylenes (mg/kg)	Total BTEX (mg/kg)	GRO (mg/kg)	DRO (mg/kg)	ORO (mg/kg)	Total GRO+DRO (mg/kg)	TPH (mg/kg)	Chloride (mg/kg)
SP-8	4	04/02/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	3,760
SP-8	5	04/02/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	9,060
SP-8	6	04/02/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	1,520
SP-8	7	04/02/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	11,800
SP-8	8	04/02/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	1,010
SP-8	9	04/02/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	272
SP-9	4	04/02/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	6,400
SP-9	5	04/02/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	6,800
SP-9	6	04/02/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	5,040
SP-9	7	04/02/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	3,360
SP-9	8	04/02/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	14,400
SP-9	9	04/02/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	384
SP-9	10	04/02/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	560
SP-9	11	04/02/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	480
SP-10	2	04/02/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	144
SP-12	4	01/21/2020	<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	<50.0	<50.0	<50.0	<50.0	<50.0	1940
SP-12A	5	01/21/2020	<0.00202	<0.00202	<0.00202	<0.00202	<0.00202	<49.8	<49.8	<49.8	<49.8	<49.8	2010
SP-12B	6	01/21/2020	<0.00201	<0.00201	<0.00201	<0.00201	<0.00201	<49.9	<49.9	<49.9	<49.9	<49.9	1760
SP-12C	7	01/21/2020	<0.00198	<0.00198	<0.00198	<0.00198	<0.00198	<50.0	<50.0	<50.0	<50.0	<50.0	1580
SP-12D	8	01/21/2020	<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	<49.8	<49.8	<49.8	<49.8	<49.8	1110
SP-12E	9	01/21/2020	<0.00199	<0.00199	<0.00199	<0.00199	<0.00199	<50.0	<50.0	<50.0	<50.0	<50.0	383
SP-12F	10	01/21/2020	<0.00199	<0.00199	<0.00199	<0.00199	<0.00199	<49.9	<49.9	<49.9	<49.9	<49.9	537
SP-12G	11	01/21/2020	<0.00199	<0.00199	<0.00199	<0.00199	<0.00199	<49.9	<49.9	<49.9	<49.9	<49.9	418
SP-12H	12	01/21/2020	<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	<50.0	<50.0	<50.0	<50.0	<50.0	698
SP-12I	13	01/21/2020	<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	<50.0	<50.0	<50.0	<50.0	<50.0	947
SP-12J	14	01/21/2020	<0.00202	<0.00202	<0.00202	<0.00202	<0.00202	<49.9	<49.9	<49.9	<49.9	<49.9	561
<b>NMOCDC Table 1 Closure Criteria</b>			<b>10</b>	<b>NE</b>	<b>NE</b>	<b>NE</b>	<b>50</b>	<b>NE</b>	<b>NE</b>	<b>NE</b>	<b>1,000</b>	<b>2,500</b>	<b>20,000</b>

**Notes:**

bgs - below ground surface

BTEX - benzene, toluene, ethylbenzene, and total xylene

DRO - diesel range organics

GRO - gasoline range organics

mg/kg - milligrams per kilogram

ORO - motor oil range organics

NMAC - New Mexico Administrative Code

NMOCDC - New Mexico Oil Conservation Division

NE - not established

TPH - total petroleum hydrocarbons

**Bold** - indicates result exceeds the applicable regulatory standard

&lt; - indicates result is below laboratory reporting limits

Table 1 - closure criteria for soils impacted by a release per NMAC 19.15.29 August 2018

Greyed data represents samples that were excavated

**TABLE 2**  
**SOIL ANALYTICAL RESULTS**  
**JRU 29 SWD TANK BATTERY**  
**REMEDIATION PERMIT NUMBER 2RP-3082, 2RP-3302, 2RP-3726, 2RP-4040**  
**EDDY COUNTY, NEW MEXICO**  
**XTO ENERGY, INC.**

Sample Name	Sample Depth (feet bgs)	Sample Date	Benzene (mg/kg)	Toluene (mg/kg)	Ethyl-benzene (mg/kg)	Total Xylenes (mg/kg)	Total BTEX (mg/kg)	GRO (mg/kg)	DRO (mg/kg)	ORO (mg/kg)	Total GRO+DRO (mg/kg)	TPH (mg/kg)	Chloride (mg/kg)
1 NW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	112*
2 NW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	64*
3 NW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	80*
4 NW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	48*
5 NW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	80*
6 NW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	32*
7 NW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	256*
8 NW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	64*
9 NW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	<16.0*
10 NW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	<16.0*
11 NW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	<16.0*
12 NW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	272*
13 NW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	96*
14 NW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	64*
15 NW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	48*
16 NW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	128*
17 NW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	48*
18 NW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	32*
19 EW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	16*
20 SW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	32*
21 SW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	51.3	18.2	51.3	69.5	<16.0*
23 SW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	48*
24 SW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	16*
25 SW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	32*
26 SW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	80*
27 SW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	64*
28 SW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	16*
NMOCB Table 1 Closure Criteria			10	NE	NE	NE	50	NE	NE	NE	1,000	2,500	20,000



**TABLE 2**  
**SOIL ANALYTICAL RESULTS**  
**JRU 29 SWD TANK BATTERY**  
**REMEDIATION PERMIT NUMBER 2RP-3082, 2RP-3302, 2RP-3726, 2RP-4040**  
**EDDY COUNTY, NEW MEXICO**  
**XTO ENERGY, INC.**

Sample Name	Sample Depth (feet bgs)	Sample Date	Benzene (mg/kg)	Toluene (mg/kg)	Ethyl-benzene (mg/kg)	Total Xylenes (mg/kg)	Total BTEX (mg/kg)	GRO (mg/kg)	DRO (mg/kg)	ORO (mg/kg)	Total GRO+DRO (mg/kg)	TPH (mg/kg)	Chloride (mg/kg)
29 WW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	112*
30 WW	2	04/06/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	272*
1 NSW	2	05/25/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	160*
2 NSW	2	05/25/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	112*
3 NSW	2	05/25/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	80*
4 NSW	2	05/25/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	592*
5 NWW	2	05/25/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	528*
6 NWW	2	05/25/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	96*
7 NNW	2	05/25/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	32*
8 NWW	2	05/25/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	176*
9 NNW	2	05/25/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	144*
10 NEW	2	05/25/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	2,080
11 NEW	2	05/25/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	6,000
12 NNW	2	05/25/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	672
13 NNW	2	05/25/2018	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<30.0	1,380
FS01	5.5	03/09/2020	<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	<49.8	<49.8	<49.8	<49.8	<49.8	2,200
<b>NMOCDC Table 1 Closure Criteria</b>			<b>10</b>	NE	NE	NE	<b>50</b>	NE	NE	NE	<b>1,000</b>	<b>2,500</b>	<b>20,000</b>

**Notes:**

bgs - below ground surface

BTEX - benzene, toluene, ethylbenzene, and total xylenes

DRO - diesel range organics

GRO - gasoline range organics

mg/kg - milligrams per kilogram

ORO - motor oil range organics

NMAC - New Mexico Administrative Code

NMOCDC - New Mexico Oil Conservation Division

NE - not established

TPH - total petroleum hydrocarbons

**Bold** - indicates result exceeds the applicable regulatory standard

&lt; - indicates result is below laboratory reporting limits

Table 1 - closure criteria for soils impacted by a release per NMAC 19.15.29 August 2018

\* - indicates sample was collected in the top 4 feet of an area to be reclaimed after remediation is complete; closure criteria for chloride concentration in the top 4 feet of soil is 600 mg/kg

ATTACHMENT 1: HISTORICAL DOCUMENTATION





PO Box 301 | Lovington , NM 88260 | Phone 575.396.2378

**December 15, 2017**

**Attn. Mike Bratcher**

NMOCD, District 2

811 South First Street

Artesia, NM 88210

**RE: Corrective Action Plan**

**XTO Energy**

**JRU 29 SWD**

**UL/K SEC. 36 T22S R30E**

**32.346432, -103.835934**

**2RP-2726; 2RP-3082; 2RP-3302; 2RP-3726 and 2RP-4040**

Mr. Bratcher:

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

### **Background and Previous Work**

The JRU 29 SWD site is located approximately 1980 feet from the North/South Line South and 2310 feet from the East/West Line West 2310 at Unit Letter K of Section 36, Township 22 South, Range 30 East in Eddy County, New Mexico. This site is located in an area where groundwater is anticipated to be greater than 200 +/- feet below ground surface (bgs) as determined by consulting a Regional Groundwater Trend map. A liner from a previous remediation effort is buried beneath a portion of the currently impacted soil. The community of Loving, New Mexico is approximately 13 miles west-southwest of the site.

Five leak events have occurred at the JRU 29 SWD and are summarized below.

The initial spill occurred on December 25, 2014. XTO discovered a release of approximately ninety-seven (97) barrels (bbls) of produced water. It is suspected that an unknown truck dumped the fluid or left the "truck load valve" open, causing the spill. Time of the release is unknown. The spill was discovered on December 25, 2014 at 5:30 AM. An estimated three (3) bbls of fluids were recovered. Approximately fourteen thousand five hundred (14,500) square feet (ft<sup>2</sup>) of tank battery/well pad were impacted. New Mexico Oil Conservation Division (NMOCD) was notified of the release on December 25, 2014, and an initial C-141 was submitted to NMOCD on January 6, 2015 for approval. The NMOCD granted approval of the C-141 on January 12, 2015. Tracking number 2RP 2726 was assigned to the spill.

A second spill event occurred on June 22, 2015. XTO discovered a release of approximately one-hundred ten (110) bbls of produced water when a pipe fitting on the 4 inch saltwater disposal (SWD) discharge line failed. Time of the release is unknown. The spill was discovered on June 22, 2015 at 6:36 PM. An estimated forty (40) bbls of fluids were recovered [twenty (20) bbl from the zero permeability containment and twenty (20) bbl from the ground]. The spill impacted approximately five thousand (5,000) ft<sup>2</sup> of pasture area. NMOCD was notified on June 26, 2015. The NMOCD granted approval of the C-141 on June 30, 2015. Tracking number 2RP 3082 was assigned to the spill.

The third spill event occurred September 18, 2015. XTO discovered a release of approximately two-hundred ninety (290) bbls of produced water when flange bolts on the south water transfer pump failed. The spill was discovered September 18, 2015 at approximately 7:00 PM. Most of the fluids were released to the zero permeability containment. Approximately two-hundred forty bbls of fluids were recovered. Produced water released to the ground impacted approximately four thousand two-hundred thirty five (4235) ft<sup>2</sup> of pasture area. NMOCD was notified September 24, 2015. NMOCD granted approval of the C-141 report on September 24, 2015. Tracking number RP-3302 was assigned to the spill.

The fourth spill event occurred in May of 2016. XTO discovered a release of approximately seven hundred seventy five (775) bbls of produced water when a VSAT (satellite) antenna was damaged and caused the SCADA communication device to fail. This failure triggered an alarm that was not properly responded to. The produced water tanks overflowed into the zero permeability containment. The containment filled and overflowed onto the well pad. The date and time of the spill is unknown. The spill was discovered approximately 10:00 AM on May 27, 2016. About seven-hundred sixty (760) bbls of fluids were recovered. The spill affected two thousand two-hundred twelve (2,212) ft<sup>2</sup> of well pad and six-hundred eighty eight (688) ft<sup>2</sup> of pasture. NMOCD was notified June 7, 2016. NMOCD granted approval of the C-141 report on June 8, 2016. Tracking number 2RP-3726 was assigned to the spill.

The fifth spill event occurred in December of 2016. XTO discovered a release of approximately three thousand three-hundred thirty two (3,324) bbls of produced water due to a transfer pump failure. The pump failure caused damage to a fiberglass line. Fluids overflowed the containment. The date and time of the spill is unknown. The spill was discovered approximately 9:00 AM on December 1, 2016. Approximately two thousand nine-hundred ninety (2,990) bbls of fluids were recovered. The spill affected about twenty two thousand one-hundred five (22,105) ft<sup>2</sup> of well pad and thirty three thousand nine-hundred thirty eight (33,938) ft<sup>2</sup> of pasture for a total of 56,043 ft<sup>2</sup> impacted. NMOCD was notified December 1, 2016 at 4:52 PM. NMOCD granted approval of the C-141 report on December 16, 2016. Tracking number 2RP 4040 was assigned to the spill.

On September 11, 2017, Basin Environmental personnel arrived on the JRU 29 SWD site to perform initial test trench (tt or tts) sampling for delineation of the subject spills. A back hoe was utilized to excavate seven tts within the release area for collection of delineation samples. The tts were labeled SP-1, SP-2, SP-3, SP-4, SP-5, SP-6, and SP-7. Each sample was field tested for chlorides using HACH Chloride test strips. Confirmatory samples were submitted to a

NMOCD approved and certified laboratory. Results of field and laboratory testing are provided in Table 1. Select laboratory data is provided on the sample points location map (Figure 2).

To summarize lab results for trench SP-1, the laboratory test for chlorides yielded 272 mg/kg at 4 feet below ground surface (bgs). Benzene, toluene, ethyl benzene and xylene (BTEX) concentrations are below the method detection limit for the laboratory. Gas range organics (GRO), diesel range organics (DRO), and extended diesel range organics (EXT DRO) are well below the Recommended Remediation Action Level (RRAL) guideline of 100 mg/kg.

For trench SP-2, the laboratory test for chlorides yielded 64 mg/kg at 5 feet bgs. BTEX showed concentrations are below the method detection limit for the laboratory. GRO, DRO, and EXT DRO are well below the RRAL guideline of 100 mg/kg.

For trench SP-3, the laboratory test for chlorides yielded 432 mg/kg at 6 feet below ground surface. Laboratory tests for BTEX showed concentrations are below the method detection limit for the laboratory. GRO, DRO, and EXT DRO are well below the RRAL guideline of 100 mg/kg.

For trench SP-4, the laboratory test for chlorides yielded 2720 mg/kg at 3 feet bgs. Preservation of a previously installed liner prevented attempts to sample deeper at this location. This liner will be removed as part of the CAP and confirmation sampling will be performed to delineate the extent of chlorides beneath the liner using remediation excavation equipment. If the depth to cleanup of chlorides cannot be reached using the remediation equipment, a PVC conduit pipe will be set through the liner and an environmental test drill will be brought to the site to complete the delineation for chlorides. Laboratory tests for BTEX showed concentrations are below the method detection limit for the laboratory. GRO is well below the RRAL guideline of 100 mg/kg. DRO and EXT DRO are 2130 mg/kg and 489 mg/kg respectively and are above the RRAL guideline of 100 mg/kg.

For trench SP-5, the laboratory test for chlorides yielded 240 mg/kg at 14 feet bgs. BTEX showed concentrations are below the method detection limit for the laboratory. GRO, DRO, and EXT DRO are well below the RRAL guideline of 100 mg/kg.

At trench SP-6, the laboratory test for chlorides yielded 64 mg/kg at 14 feet bgs. BTEX showed concentrations are below the method detection limit for the laboratory. GRO, DRO, and EXT DRO were well below the RRAL guideline of 100 mg/kg.

For trench SP-7, the laboratory test for chlorides yielded 1760 mg/kg at 14 feet. Further delineation for chlorides at this site will be performed during execution of the CAP using excavation equipment. If the depth to cleanup of chlorides cannot be reached using the remediation excavation equipment, a PVC conduit pipe will be set through the liner and an environmental test drill will be brought to the site to complete the delineation for chlorides. However, laboratory tests for BTEX showed concentrations are below the method detection limit for the laboratory. GRO, DRO, and EXT DRO are well below the RRAL guideline of 100 mg/kg.



## Corrective Action Plan (CAP)

Approximately 72,870 ft<sup>2</sup> of caliche pad and pasture are impacted at the JRU 29 SWD site. Of that total, approximately 32,300 ft<sup>2</sup> is caliche pad and approximately 40,570 is pasture land. Remediation of the impacted pasture soils and pad materials will be accomplished per the methods described below. A New Mexico State Land Office permit will be necessary to access the site.

A liner from a prior remediation effort will be removed. Location of the previously existing liner is shown in Figure 2. At sample locations SP-4 and SP-7 (reference Figure 2) excavation equipment will be utilized to collect deeper delineation samples for testing with field methods. Excavation and sampling will continue until results of field testing show chlorides are at or below the NMOCD target of 600 mg/kg. If a satisfactory delineation at or below the NMOCD target is obtained, the sample trenches will be backfilled and the soil material will be compacted.

The impacted pasture soils will then be excavated to a depth of four feet bgs. This excavated soil will be transported to Lea Land (NMOCD Permit # WM01) for disposal. If required, a six-inch cushion layer of sand may be installed over the entire excavation site. A 20 mil impermeable liner will then be installed over in-situ soil (or a backfill of 6 to 12-inch layer of cushioning sand, if required) to the limits of the excavation. A 6 to 12-inch sand layer will be placed on top of the liner over the entire excavation in order to protect the integrity of the liner during backfilling operations. Locally procured soil materials will be used to backfill the excavated area in one to two foot lifts. The lifts will be compacted with excavation equipment. The fill area will be graded to blend with the contours of the surrounding topography. At the completion of backfilling and at a time conducive for germination, Basin will loosen the surface of the backfilled soils with a disc, rake or harrow. Basin will then seed the extent of the remediated pasture area at JRU 29 SWD with a blend of native, non-noxious vegetation approved by the New Mexico State Land Office. The seed will be applied with either a drill or a broadcast method to ensure complete coverage of the affected area.

In the event that delineation of chlorides at locations SP-4 and SP-7 cannot be achieved to levels below the NMOCD target of 600 mg/kg when using remediation excavation equipment to facilitate sampling, PVC conduit (referenced above) will be set and sealed to the liner material prior to backfilling to grade. An environmental test drilling rig will be brought to the site and the strata at depth will be sampled until delineation at or below 600 mg/kg chlorides is achieved. The resultant soil boring will be backfilled with bentonite chips in lifts and hydrated per manufacturer's recommendations. Each borehole will be filled to the surface of the ground.

In addition to the pasture area, approximately 32,300 ft<sup>2</sup> of caliche pad at JRU 29 SWD is impacted. The impacted pad area will be excavated to an area approximately one foot in depth. This excavated caliche will be transported to Lea Land (NMOCD Permit # WM01) for disposal. The excavated area will then be backfilled with clean, non-impacted caliche. The clean caliche will be spread in thin layers (three to six-inches thick). Each layer will be watered and roll compacted to dryness and watered again. Another layer of caliche will be added on top of the previous layer until the fill area is brought up to grade.

The supporting documentation for this Corrective Action Plan is attached.

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

Sincerely,

John P. Farrell P.G.  
Project Manager  
Basin Environmental Service Technologies  
(575) 393-2378

Attachments:

Figure 1 – Site Location Map  
Figure 2 – Sample Locations and Select Analytical Sampling Data  
Table 1 – 2017 Sample Concentrations of BTEX, TPH and Chloride  
Appendix A – Laboratory Analysis  
Appendix B – C-141 Forms

## **ATTACHMENTS**

TABLE

**TABLE 1**  
**2017 CONCENTRATIONS OF FIELD CHLORIDE**  
**XTO**  
**JRU 29 SWD**  
**EDDY COUNTY, NEW MEXICO**  
**NMOCD REFERENCE #'S: 2RP-2726, 2RP-3082, 2RP-3302, 2RP-3726 and 2RP-4040**

SAMPLE LOCATION	SAMPLE DEPTH (BGS)	SAMPLE DATE	SOIL STATUS	METHOD: 8015B			TPH C <sub>6</sub> -C <sub>35</sub> (mg/Kg)	FIELD	4500 CL-B
				GRO C <sub>6</sub> -C <sub>12</sub> (mg/Kg)	DRO C <sub>12</sub> -C <sub>28</sub> (mg/Kg)	EXT DRO C <sub>28</sub> -C <sub>36</sub> (mg/Kg)		CHLORIDE (mg/Kg)	CHLORIDE (mg/Kg)
TT-1	SUR	9/11/2017	In-Situ	NA	NA	NA	NA	>2456	NA
TT-1	1'	9/11/2017	In-Situ	NA	NA	NA	NA	560	NA
TT-1	2'	9/11/2017	In-Situ	NA	NA	NA	NA	344	NA
TT-1	3'	9/11/2017	In-Situ	NA	NA	NA	NA	272	NA
TT-1	4'	9/11/2017	In-Situ	<10.0	<10.0	<10.0	<30.0	180	272
TT-2	SUR	9/11/2017	In-Situ	NA	NA	NA	NA	> 2604	NA
TT-2	1'	9/11/2017	In-Situ	NA	NA	NA	NA	2060	NA
TT-2	2'	9/11/2017	In-Situ	NA	NA	NA	NA	1528	NA
TT-2	3'	9/11/2017	In-Situ	NA	NA	NA	NA	1136	NA
TT-2	4'	9/11/2017	In-Situ	NA	NA	NA	NA	264	NA
TT-2	5'	9/11/2017	In-Situ	<10.0	<10.0	<10.0	<30.0	< 112	64
TT-3	SUR	9/11/2017	In-Situ	NA	NA	NA	NA	> 2604	NA
TT-3	1'	9/11/2017	In-Situ	NA	NA	NA	NA	476	NA
TT-3	2'	9/11/2017	In-Situ	NA	NA	NA	NA	360	NA
TT-3	3'	9/11/2017	In-Situ	NA	NA	NA	NA	476	NA
TT-3	4'	9/11/2017	In-Situ	NA	NA	NA	NA	520	NA
TT-3	5'	9/11/2017	In-Situ	NA	NA	NA	NA	328	NA
TT-3	6'	9/11/2017	In-Situ	<10.0	<10.0	<10.0	<30.0	236	432
TT-4	SUR	9/11/2017	In-Situ	NA	NA	NA	NA	> 2604	NA
TT-4	1'	9/11/2017	In-Situ	NA	NA	NA	NA	> 2604	NA
TT-4	2'	9/11/2017	In-Situ	NA	NA	NA	NA	1,974	NA
TT-4	3'	9/11/2017	In-Situ	<10.0	2130	489	2619	1,224	2720

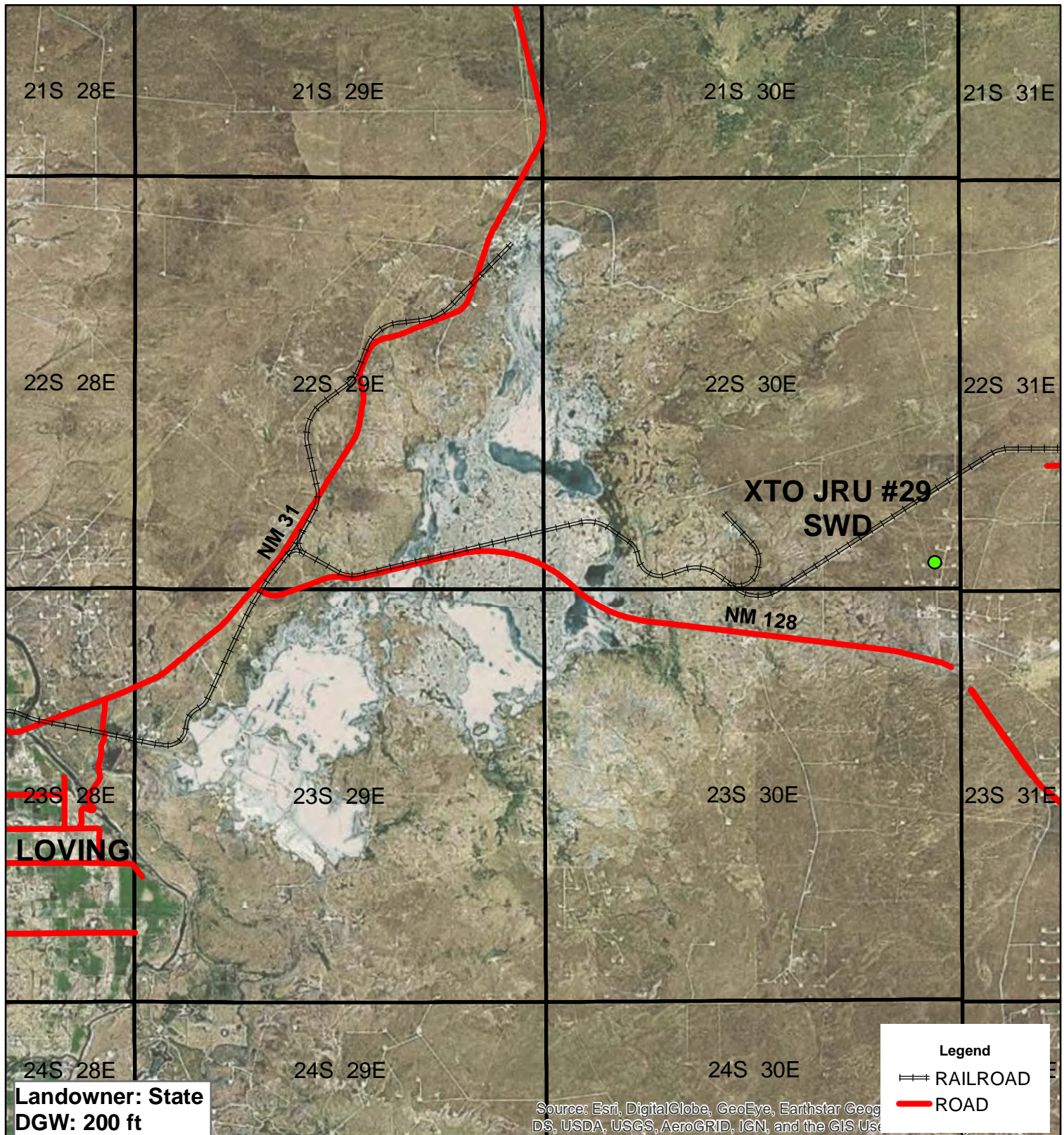


**TABLE 1**  
**2017 CONCENTRATIONS OF FIELD CHLORIDE**  
**XTO**  
**JRU 29 SWD**  
**EDDY COUNTY, NEW MEXICO**  
**NMOCD REFERENCE #S: 2RP-2726, 2RP-3082, 2RP-3302, 2RP-3726 and 2RP-4040**

SAMPLE LOCATION	SAMPLE DEPTH (BGS)	SAMPLE DATE	SOIL STATUS	METHOD: 8015B			TPH C <sub>6</sub> -C <sub>35</sub> (mg/Kg)	FIELD	4500 CL-B
				GRO C <sub>6</sub> -C <sub>12</sub> (mg/Kg)	DRO C <sub>12</sub> -C <sub>28</sub> (mg/Kg)	EXT DRO C <sub>28</sub> -C <sub>36</sub> (mg/Kg)		CHLORIDE (mg/Kg)	CHLORIDE (mg/Kg)
TT-5	SUR	9/11/2017	In-Situ	NA	NA	NA	NA	> 2604	NA
TT-5	1'	9/11/2017	In-Situ	NA	NA	NA	NA	360	NA
TT-5	2'	9/11/2017	In-Situ	NA	NA	NA	NA	564	NA
TT-5	3'	9/11/2017	In-Situ	NA	NA	NA	NA	328	NA
TT-5	4'	9/11/2017	In-Situ	NA	NA	NA	NA	< 112	NA
TT-5	5'	9/11/2017	In-Situ	NA	NA	NA	NA	564	NA
TT-5	6'	9/11/2017	In-Situ	NA	NA	NA	NA	564	NA
TT-5	7'	9/11/2017	In-Situ	NA	NA	NA	NA	476	NA
TT-5	8'	9/11/2017	In-Situ	NA	NA	NA	NA	564	NA
TT-5	9'	9/11/2017	In-Situ	NA	NA	NA	NA	440	NA
TT-5	14'	9/11/2017	In-Situ	<10.0	<10.0	<10.0	<30.0	160	240
TT-6	SUR	9/11/2017	In-Situ	NA	NA	NA	NA	< 112	NA
TT-6	1'	9/11/2017	In-Situ	NA	NA	NA	NA	< 112	NA
TT-6	2'	9/11/2017	In-Situ	NA	NA	NA	NA	328	NA
TT-6	3'	9/11/2017	In-Situ	NA	NA	NA	NA	> 2604	NA
TT-6	4'	9/11/2017	In-Situ	NA	NA	NA	NA	2,408	NA
TT-6	6'	9/11/2017	In-Situ	NA	NA	NA	NA	296	NA
TT-6	8'	9/11/2017	In-Situ	NA	NA	NA	NA	< 112	NA
TT-6	14'	9/11/2017	In-Situ	<10.0	<10.0	<10.0	<30.0	< 112	64
TT-7	SUR	9/11/2017	In-Situ	NA	NA	NA	NA	< 112	NA
TT-7	1'	9/11/2017	In-Situ	NA	NA	NA	NA	328	NA
TT-7	2'	9/11/2017	In-Situ	NA	NA	NA	NA	> 2604	NA
TT-7	3'	9/11/2017	In-Situ	NA	NA	NA	NA	1644	NA
TT-7	4'	9/11/2017	In-Situ	NA	NA	NA	NA	1644	NA
TT-7	6'	9/11/2017	In-Situ	NA	NA	NA	NA	908	NA
TT-7	8'	9/11/2017	In-Situ	NA	NA	NA	NA	664	NA
TT-7	14'	9/11/2017	In-Situ	<10.0	<10.0	<10.0	<30.0	976	1760
<b>NMOCD Regulatory Standard</b>				<b>10</b>			<b>5000</b>	<b>600</b>	<b>600</b>

# FIGURES





## XTO JRU 29 SWD

2RP-2766, 2RP-3082, 2RP-3302,  
2RP-3726 & 2RP-4040

UL K SECTION 36  
T-22-S R-30-E  
EDDY COUNTY, NM

GPS: 32.319360 -103.931548

## Figure 1

0 1 2  
Miles

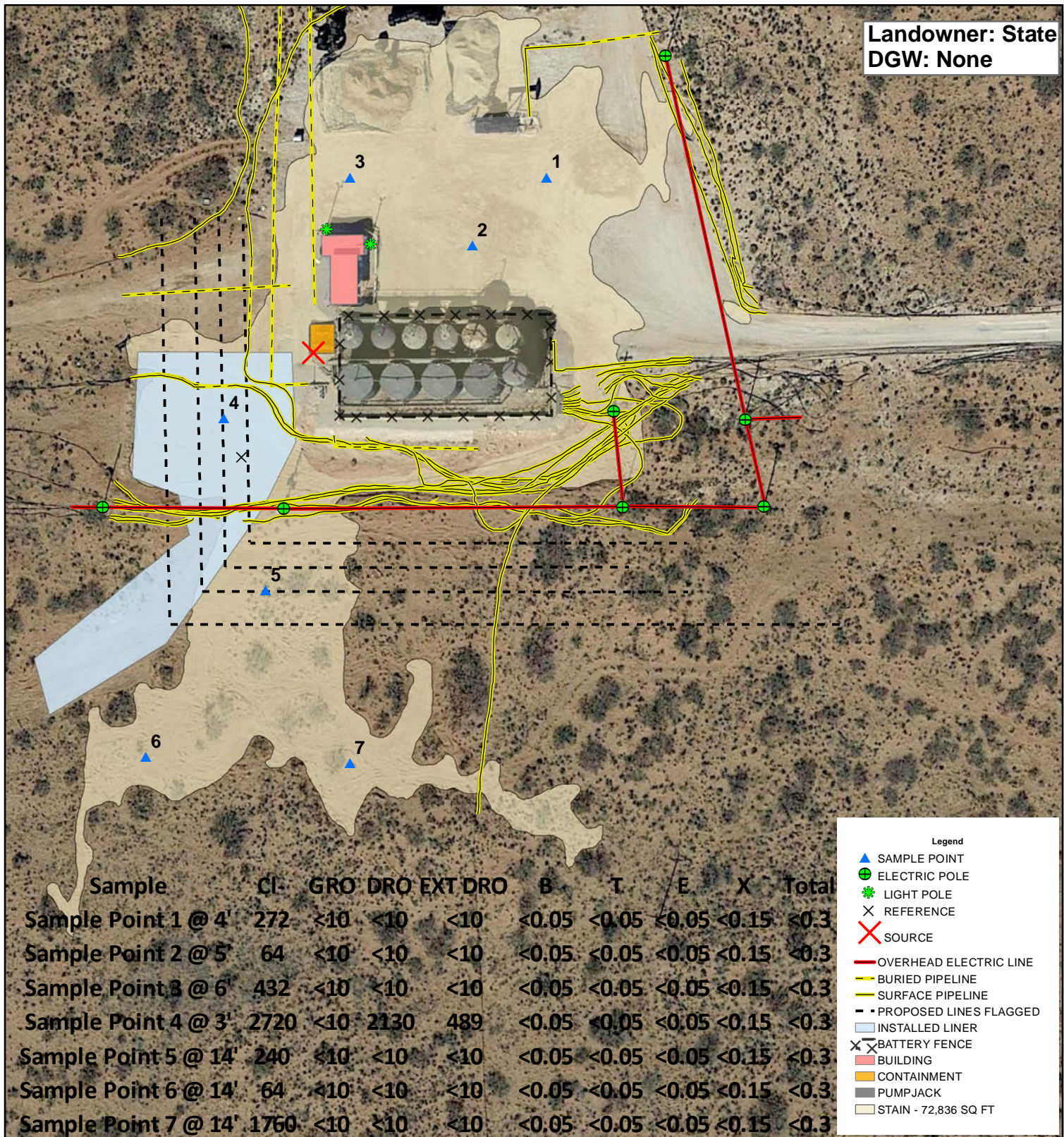
Drawing date: 10/10/17  
Drafted by: T. Grieco





## Initial Sampling

Landowner: State  
DGW: None



**XTO**  
**JRU 29**

UL K SECTION 36  
T-22-S R-30-E  
EDDY COUNTY, NM

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

GPS: 32.346386 -103.835900

0 50 100  
Feet

GPS date: 9/5/17, 10/2/17 TG  
Drawing date: 10/2/17  
Drafted by: T. Grieco





# APPENDIX A





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

---

September 25, 2017

ROBBIE RUNNELS

Basin Environmental Service

P.O. Box 301

Lovington, NM 88260

RE: JRU 29 SWD

Enclosed are the results of analyses for samples received by the laboratory on 09/18/17 15:26.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-16-8. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

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

Celey D. Keene

Lab Director/Quality Manager



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

**Analytical Results For:**

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

Received: 09/18/2017  
 Reported: 09/25/2017  
 Project Name: JRU 29 SWD  
 Project Number: NONE GIVEN  
 Project Location: EDDY COUNTY, NM

Sampling Date: 09/11/2017  
 Sampling Type: Soil  
 Sampling Condition: \*\* (See Notes)  
 Sample Received By: Tamara Oldaker

**Sample ID: SP1 @ 4' (H702515-01)**

BTX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/22/2017	ND	1.90	95.2	2.00	0.810	
Toluene*	<0.050	0.050	09/22/2017	ND	1.77	88.6	2.00	1.97	
Ethylbenzene*	<0.050	0.050	09/22/2017	ND	1.85	92.4	2.00	1.18	
Total Xylenes*	<0.150	0.150	09/22/2017	ND	5.59	93.2	6.00	1.42	
Total BTX	<0.300	0.300	09/22/2017	ND					

Surrogate: 4-Bromofluorobenzene (PID) 111 % 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	272	16.0	09/20/2017	ND	432	108	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	09/20/2017	ND	183	91.7	200	0.349	
DRO >C10-C28	<10.0	10.0	09/20/2017	ND	196	98.0	200	0.105	
EXT DRO >C28-C36	<10.0	10.0	09/20/2017	ND					

Surrogate: 1-Chlorooctane 82.3 % 28.3-164

Surrogate: 1-Chlorooctadecane 85.0 % 34.7-157

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

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

Received: 09/18/2017  
 Reported: 09/25/2017  
 Project Name: JRJ 29 SWD  
 Project Number: NONE GIVEN  
 Project Location: EDDY COUNTY, NM

Sampling Date: 09/11/2017  
 Sampling Type: Soil  
 Sampling Condition: \*\* (See Notes)  
 Sample Received By: Tamara Oldaker

**Sample ID: SP 2 @ 5' (H702515-02)**

BTX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/22/2017	ND	1.90	95.2	2.00	0.810		
Toluene*	<0.050	0.050	09/22/2017	ND	1.77	88.6	2.00	1.97		
Ethylbenzene*	<0.050	0.050	09/22/2017	ND	1.85	92.4	2.00	1.18		
Total Xylenes*	<0.150	0.150	09/22/2017	ND	5.59	93.2	6.00	1.42		
Total BTX	<0.300	0.300	09/22/2017	ND						

Surrogate: 4-Bromofluorobenzene (PID) 112 % 72-148

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	64.0	16.0	09/20/2017	ND	432	108	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	09/21/2017	ND	183	91.7	200	0.349	
DRO >C10-C28	<10.0	10.0	09/21/2017	ND	196	98.0	200	0.105	
EXT DRO >C28-C36	<10.0	10.0	09/21/2017	ND					

Surrogate: 1-Chlorooctane 84.4 % 28.3-164

Surrogate: 1-Chlorooctadecane 86.3 % 34.7-157

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**Analytical Results For:**

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

Received: 09/18/2017  
 Reported: 09/25/2017  
 Project Name: JRJ 29 SWD  
 Project Number: NONE GIVEN  
 Project Location: EDDY COUNTY, NM

Sampling Date: 09/11/2017  
 Sampling Type: Soil  
 Sampling Condition: \*\* (See Notes)  
 Sample Received By: Tamara Oldaker

**Sample ID: SP 3 @ 6' (H702515-03)**

BTX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/22/2017	ND	1.90	95.2	2.00	0.810	
Toluene*	<0.050	0.050	09/22/2017	ND	1.77	88.6	2.00	1.97	
Ethylbenzene*	<0.050	0.050	09/22/2017	ND	1.85	92.4	2.00	1.18	
Total Xylenes*	<0.150	0.150	09/22/2017	ND	5.59	93.2	6.00	1.42	
Total BTX	<0.300	0.300	09/22/2017	ND					

Surrogate: 4-Bromofluorobenzene (PID) 111 % 72-148

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	432	16.0	09/20/2017	ND	432	108	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	09/21/2017	ND	183	91.7	200	0.349	
DRO >C10-C28	<10.0	10.0	09/21/2017	ND	196	98.0	200	0.105	
EXT DRO >C28-C36	<10.0	10.0	09/21/2017	ND					

Surrogate: 1-Chlorooctane 82.6 % 28.3-164

Surrogate: 1-Chlorooctadecane 89.7 % 34.7-157

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**Analytical Results For:**

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

Received: 09/18/2017  
 Reported: 09/25/2017  
 Project Name: JRJ 29 SWD  
 Project Number: NONE GIVEN  
 Project Location: EDDY COUNTY, NM

Sampling Date: 09/11/2017  
 Sampling Type: Soil  
 Sampling Condition: \*\* (See Notes)  
 Sample Received By: Tamara Oldaker

**Sample ID: SP 4 @ 3' (H702515-04)**

BTX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/22/2017	ND	1.90	95.2	2.00	0.810	
Toluene*	<0.050	0.050	09/22/2017	ND	1.77	88.6	2.00	1.97	
Ethylbenzene*	<0.050	0.050	09/22/2017	ND	1.85	92.4	2.00	1.18	
Total Xylenes*	<0.150	0.150	09/22/2017	ND	5.59	93.2	6.00	1.42	
Total BTX	<0.300	0.300	09/22/2017	ND					

Surrogate: 4-Bromofluorobenzene (PID) 116 % 72-148

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	2720	16.0	09/20/2017	ND	432	108	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	09/21/2017	ND	183	91.7	200	0.349	
DRO >C10-C28	2130	10.0	09/21/2017	ND	196	98.0	200	0.105	
EXT DRO >C28-C36	489	10.0	09/21/2017	ND					

Surrogate: 1-Chlorooctane 80.9 % 28.3-164

Surrogate: 1-Chlorooctadecane 123 % 34.7-157

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**Analytical Results For:**

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

Received: 09/18/2017  
 Reported: 09/25/2017  
 Project Name: JRJ 29 SWD  
 Project Number: NONE GIVEN  
 Project Location: EDDY COUNTY, NM

Sampling Date: 09/11/2017  
 Sampling Type: Soil  
 Sampling Condition: \*\* (See Notes)  
 Sample Received By: Tamara Oldaker

**Sample ID: SP 5 @ 14' (H702515-05)**

BTX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/22/2017	ND	1.97	98.3	2.00	0.292	
Toluene*	<0.050	0.050	09/22/2017	ND	1.82	91.1	2.00	0.577	
Ethylbenzene*	<0.050	0.050	09/22/2017	ND	1.91	95.4	2.00	0.0216	
Total Xylenes*	<0.150	0.150	09/22/2017	ND	5.73	95.4	6.00	0.0613	
Total BTX	<0.300	0.300	09/22/2017	ND					

Surrogate: 4-Bromofluorobenzene (PID) 108 % 72-148

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	240	16.0	09/20/2017	ND	432	108	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	09/25/2017	ND	183	91.7	200	0.349	
DRO >C10-C28	<10.0	10.0	09/25/2017	ND	196	98.0	200	0.105	
EXT DRO >C28-C36	<10.0	10.0	09/25/2017	ND					

Surrogate: 1-Chlorooctane 79.5 % 28.3-164

Surrogate: 1-Chlorooctadecane 86.9 % 34.7-157

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**Analytical Results For:**

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 P.O. Box 301  
 Lovington NM, 88260  
 Fax To: (575) 396-1429

Received: 09/18/2017  
 Reported: 09/25/2017  
 Project Name: JRJ 29 SWD  
 Project Number: NONE GIVEN  
 Project Location: EDDY COUNTY, NM

Sampling Date: 09/11/2017  
 Sampling Type: Soil  
 Sampling Condition: \*\* (See Notes)  
 Sample Received By: Tamara Oldaker

**Sample ID: SP 6 @ 14' (H702515-06)**

BTX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/22/2017	ND	1.97	98.3	2.00	0.292		
Toluene*	<0.050	0.050	09/22/2017	ND	1.82	91.1	2.00	0.577		
Ethylbenzene*	<0.050	0.050	09/22/2017	ND	1.91	95.4	2.00	0.0216		
Total Xylenes*	<0.150	0.150	09/22/2017	ND	5.73	95.4	6.00	0.0613		
Total BTX	<0.300	0.300	09/22/2017	ND						

Surrogate: 4-Bromofluorobenzene (PID) 110 % 72-148

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	64.0	16.0	09/20/2017	ND	432	108	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	09/21/2017	ND	183	91.7	200	0.349	
DRO >C10-C28	<10.0	10.0	09/21/2017	ND	196	98.0	200	0.105	
EXT DRO >C28-C36	<10.0	10.0	09/21/2017	ND					

Surrogate: 1-Chlorooctane 99.9 % 28.3-164

Surrogate: 1-Chlorooctadecane 105 % 34.7-157

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**Analytical Results For:**

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

Received: 09/18/2017  
 Reported: 09/25/2017  
 Project Name: JRJ 29 SWD  
 Project Number: NONE GIVEN  
 Project Location: EDDY COUNTY, NM

Sampling Date: 09/12/2017  
 Sampling Type: Soil  
 Sampling Condition: \*\* (See Notes)  
 Sample Received By: Tamara Oldaker

**Sample ID: SP 7 @ 14' (H702515-07)**

BTX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/22/2017	ND	1.97	98.3	2.00	0.292	
Toluene*	<0.050	0.050	09/22/2017	ND	1.82	91.1	2.00	0.577	
Ethylbenzene*	<0.050	0.050	09/22/2017	ND	1.91	95.4	2.00	0.0216	
Total Xylenes*	<0.150	0.150	09/22/2017	ND	5.73	95.4	6.00	0.0613	
Total BTX	<0.300	0.300	09/22/2017	ND					

Surrogate: 4-Bromofluorobenzene (PID) 110 % 72-148

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1760	16.0	09/20/2017	ND	432	108	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	09/21/2017	ND	183	91.7	200	0.349	
DRO >C10-C28	<10.0	10.0	09/21/2017	ND	196	98.0	200	0.105	
EXT DRO >C28-C36	<10.0	10.0	09/21/2017	ND					

Surrogate: 1-Chlorooctane 96.0 % 28.3-164

Surrogate: 1-Chlorooctadecane 104 % 34.7-157

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### 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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A handwritten signature in black ink, appearing to read "Celey D. Keene".

---

Celey D. Keene, Lab Director/Quality Manager



## ORDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240  
(575) 393-2326 FAX (575) 393-2476

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]

**Littrell, Kyle**

---

**From:** Ruth, Amy  
**Sent:** Friday, March 9, 2018 3:00 PM  
**To:** Littrell, Kyle  
**Cc:** Foust, Bryan  
**Subject:** FW: Corrective Action Plan for JRU 29 SWD

**Importance:** High

FYI, we are approved by OCD to begin the JRU 29 SWD. We already submitted an AFE proposal for this one. The OCD is just asking for some extra sampling. Not bad, though.

---

**From:** Weaver, Crystal, EMNRD [mailto:Crystal.Weaver@state.nm.us]  
**Sent:** Friday, March 09, 2018 12:26 PM  
**To:** John Farrell; Bratcher, Mike, EMNRD  
**Cc:** Ruth, Amy; agroves@slo.state.nm.us; 'Jody Walters'; 'Robbie Runnels'  
**Subject:** RE: Corrective Action Plan for JRU 29 SWD

RE: XTO (BOPCO OGRID 260737) \* James Ranch Unit 29 SWD Battery (API utilized is for JRU #29 well 30-015-27735) \* 2RP-2726, 2RP-3082, 2RP-3302, 2RP-3726 , and 2RP-4040

Hello all,

I believe I also attended the meeting that John mentioned that occurred on 10/4/17 and upon review of the existing files OCD has for these case numbers mentioned above I feel I am as equipped as anyone else to provide a review of this project, unless there are any emails going back and forth on it that I do not know about because they were only with Mike Bratcher. So if no emails of that nature exist then we should be good.

First off I wanted to say this is a well written work plan. Thank you for that. Explanations and history that is provided in the plan helps out a lot. Also the email body of the email that this work plan was sent with helps out cause it summarizes what XTO interpreted from what was discussed during the meeting we had with you all.

In review of the work plan and meeting summary notes OCD approves this work plan but needs to include/request the following additions/conditions:

- It appears that data for each sample point in the Excel data table is all field data up until the last deepest depth sample taken for each sample point which each of those samples appears to have been sent in for laboratory testing confirmation. Since the remediation proposal for this location is to perform the 4ft removal with liner placement, OCD normally must acquire lab tested samples for the whole delineation of each sample point that show from start to finish what we have in the soil column until target clean delineation numbers are reached.
  - However, due to how long this work plan has sat and other factors OCD will accept confirmation samples produced during the excavation process instead of requesting that the delineation data be recollected. So starting of course below the 4ft depth OCD needs you all to have lab data tested for all RRAL and COA required constituents until they show clean based on site ranking score clean up levels and chloride delineation requirement. The sampling that gets submitted to the lab can start below the 4ft mark as I mentioned but the samples need to be in 1ft intervals and need to be tested for TPH for extended range (GRO+DRO+MRO; C<sub>6</sub> thru C<sub>36</sub>) using method 8015, Benzene results of 10ppm or less and total BTEX of 50ppm or less tested via either Method 8260 or 8021, and chlorides are to be 600ppm or less using EPA Method 300.0 testing.

- I understand that during the reporting phase via C-141s for all of these spills it was stated on the forms that produced water was the only production fluid lost each time. However, produced water is regularly known to have many contaminants in it and OCD asking for verification that BTEX and TPH are not an issue is standard procedure. I believe we discussed all of this during the meeting of 10/4/17. . . Correct me if I am wrong on that. If we didn't discuss then I may be getting another meeting mixed up with this one, but it is no matter cause it is still being requested now.
- Also when I do a ground water assessment study, on my end, I find the closest well (with depth to water data) to the location is actually one with documentation of shallower depth to water than a lot of the other ground water wells that are farther away from your location. OSE cites depth to ground water for well C-2492 at 85ft. So based on that assessment OCD will assess a site ranking score for this location of 10, which only changes the target levels for TPH, which will now need to be at 1000ppm or less.
- Furthermore, because the occurrence of spills at this location total 5 over the span of time from 2014- now, and are now all being dealt with in a group project OCD feels justified in saying that based on depth to ground water having the potential to be less than 100ft for this site, we will need some additional confirmation sample points to be collected during the excavation process for this spill plume area. Please generate an additional confirmation sample point somewhere between your existing SP-5 and SP-7 and if practicable somewhere directly south of the battery but still on the pad.
- Also as you all have offered full delineation for chlorides at your SP-4 and SP-7 still needs to proceed as you all have indicated you are prepared to do.
- Please provide OCD notification of when this project has been mobilized to begin remediation efforts.

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

If you have any questions or concerns, and for notification of mobilization of equipment, please contact Mike Bratcher and/or myself in the District II Office.

## Crystal Weaver

Environmental Specialist

OCD – Artesia District II

811 S. 1<sup>st</sup> Street

Artesia, NM 88210

Office: 575-748-1283 ext. 101

Cell: 575-840-5963

Fax: 575-748-9720



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**From:** John Farrell [<mailto:jfarrell@basinenv.com>]  
**Sent:** Friday, December 15, 2017 11:41 AM  
**To:** Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Cc:** 'Ruth, Amy' <[Amy\\_Ruth@xtoenergy.com](mailto:Amy_Ruth@xtoenergy.com)>; Weaver, Crystal, EMNRD <[Crystal.Weaver@state.nm.us](mailto:Crystal.Weaver@state.nm.us)>; [agroves@slo.state.nm.us](mailto:agroves@slo.state.nm.us); 'Jody Walters' <[sjwalters@basinenv.com](mailto:sjwalters@basinenv.com)>; 'Robbie Runnels' <[rrunnels@basinenv.com](mailto:rrunnels@basinenv.com)>  
**Subject:** Corrective Action Plan for JRU 29 SWD

Dear Mr. Bratcher:

Attached, please find the Corrective Action Plan (CAP) for the XTO JRU 29 SWD facility in Eddy County, New Mexico.

To review, during our meeting on October 4, 2017, Basin Environmental/XTO stated the JRU 29 SWD CAP was preliminary and that it would be updated; that a regional Groundwater Trend Map would be used to determine depth to groundwater at the site; that there will be further delineation of chlorides at Test Trenches 4 and 7 using excavation equipment; and, in pasture areas impacted by the spills, Basin will remove a previously existing liner and place a new liner using methods described in the CAP.

Per NMOCD request, as part of the CAP, Basin has placed data from field and laboratory testing into a Microsoft Xcel<sup>®</sup> Spreadsheet to facilitate ease of review. Please note that Basin used the 600mg/kg chloride level discussed at the meeting as the benchmark indicating that cleanup has been achieved.

CAP SUMMARY: the CAP proposes some additional delineation of chlorides at two of the test trench points, soil removal to a depth of approximately 4 feet and placement of a liner over the area of contamination in pasture areas and grading to local contours. The plan also calls for removal of 1 foot of caliche on the chloride impacted pad area followed by replacement with un-impacted caliche and compaction to complete the remedial process. Currently, excavation of impacted soil and installation of liners is the best available technology to further prevent migration of contaminants downwards towards the water table.

Please review the attached CAP and provide any comments to Amy Ruth of XTO with copies to Jody Walters, Robbie Runnels and John Farrell of Basin Environmental Service Technologies.

Sincerely,

John P. Farrell P.G.  
Project Manager  
Basin Environmental Service Technologies, LLC  
575 631 1278

ATTACHMENT 2: INITIAL/FINAL NIM OCD FORM C-141 (2RP-3082, 2RP-3302, 2RP-3726, and 2RP-4040)

## NM OIL CONSERVATION

ARTESIA DISTRICT

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

JUN 26 2015

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  
conformance with 19.15.29 NMAC.

RECEIVED

## Release Notification and Corrective Action

**NAB1518142271** **OPERATOR** ☒ Initial Report ☐ Final Report

Name of Company: BOPCO, L.P. <b>260737</b>	Contact: Tony Savoie
Address: 522 W. Mermod, Suite 704 Carlsbad, N.M. 88220	Telephone No. 575-887-7329
Facility Name: JRU-29 SWD Tank Battery	Facility Type: SWD

Surface Owner: State of N.M.	Mineral Owner: State of N.M.	API No. 30-015-27735
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## LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County:
K	36	22S	30E	1980	South	2310	West	Eddy

Latitude N 32.346432 Longitude W 103.835934

## NATURE OF RELEASE

Type of Release: Produced water	Volume of Release: 110 bbls.	Volume Recovered: 40 bbls.
Source of Release: 4" SWD pump discharge line	Date and Hour of Occurrence: 6/22/15 Time unknown	Date and Hour of Discovery: 6/22/15 at about 5:45 p.m.
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? NMOCD emergency #104	
By Whom? Tony Savoie	Date and Hour: 6/22/15 at 6:36 p.m.	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

A 4" pipe fitting failed on the discharge of the SWD transfer pump. The pump was shut down and the fitting was replaced.

Describe Area Affected and Cleanup Action Taken.\*

The spill impacted approximately 5,000 sq.ft. of pasture area. All of the free standing fluid was recovered with a vacuum truck. Twenty bbls of PW was recovered from the 0 Perm containment and 20bbls off the ground. A portion of the impacted area has a liner installed at about 3 ft. in depth. This liner was installed during a previous closed remediation at the location.

The spill area will be cleaned up in accordance to the NMOCD remediation guidelines.

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

Signature: <i>Tony Savoie</i>	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Tony Savoie	Signed By: <i>M. L. Brannon</i> Approved by Environmental Specialist:	
Title: Waste Management and Remediation Specialist	Approval Date: <i>6/30/15</i>	Expiration Date: <i>N/A</i>
E-mail Address: tasavoie@basspet.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: 6/26/15	Phone: 432-556-8730	

\* Attach Additional Sheets If Necessary

Remediation per O.C.D. Rules & Guidelines  
SUBMIT REMEDIATION PROPOSAL NO  
LATER THAN: *8/1/15*

2RP-3082

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

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

Incident ID	
District RP	2RP-3082
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party: XTO Energy, Inc	OGRID: 5380
Contact Name: Kyle Littrell	Contact Telephone: (432)-221-7331
Contact email: Kyle_Littrell@xtoenergy.com	Incident #: 2RP-3082
Contact mailing address: 522 W. Mermod, Suite 704 Carlsbad, NM 88220	

### Location of Release Source

Latitude 32.346432 Longitude -103.835934  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: JRU-29 SWD Tank Battery	Site Type: Exploration and Production
Date Release Discovered: 6/22/2015	API# (if applicable) 30-015-27735

Unit Letter	Section	Township	Range	County
K	36	22S	30E	Eddy

Surface Owner: ☒ State ☐ Federal ☐ Tribal ☐ 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)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 110 bbls	Volume Recovered (bbls) 40 bbls
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

#### Cause of Release

A 4" pipe fitting failed on the discharge of the SWD transfer pump. The pump was shut down and the fitting was replaced.

Incident ID	
District RP	2RP-3082
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC?  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? Release volume was greater than 25 bbls.
If YES, was immediate notice given to the OCD? Yes, immediate notice was given to NMOCD emergency #104 by Tony Savoie on 06/22/2015 at 6:36pm.	

## Initial Response

*The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury*

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.
If all the actions described above have <u>not</u> been undertaken, explain why:          
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.
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: <u>Kyle Littrell</u> Title: <u>SH&amp;E Supervisor</u>  Signature: _____ Date: <u>4-28-2020</u>  email: <u>Kyle_Littrell@xtoenergy.com</u> Telephone: <u>432-221-7331</u>
<b><u>OCD Only</u></b>  Received by: _____ Date: _____



Incident ID	
District RP	2RP-3082
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?	<u>&gt; 100</u> (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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
- ☒ Topographic/Aerial maps
- ☒ Laboratory data including chain of custody

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.

State of New Mexico  
Oil Conservation Division

Page 4

Incident ID	
District RP	2RP-3082
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: \_\_\_\_\_ Date: 4/28/2020

email: Kyle Littrell@xtoenergy.com Telephone: (432)-221-7331

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Incident ID	
District RP	2RP-3082
Facility ID	
Application ID	

## Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

**Closure Report Attachment Checklist:** *Each of the following items must be included in the closure report.*

- ☒ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☒ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☒ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☒ Description of remediation activities

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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Kyle Littrell Title: SH&E Supervisor

Signature: \_\_\_\_\_ Date: 4-28-2020

email: Kyle\_Littrell@xtoenergy.com Telephone: 432-221-7331

### OCD Only

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

## NM OIL CONSERVATION

ARTESIA DISTRICT

SEP 24 2015

Form C-141  
Revised August 8, 2011Submit 1 Copy to appropriate District Office in  
conformance with 19.15.29 NMAC.

RECEIVED

## Release Notification and Corrective Action

NAB1526753593

## OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: BOPCO, L.P. <i>260737</i>	Contact: Amy Ruth
Address: 522 W. Mermod, Suite 704 Carlsbad, N.M. 88220	Telephone No. 575-887-7329
Facility Name: James Ranch Unit #29 SWD Tank Battery	Facility Type: SWD

Surface Owner: State of New Mexico	Mineral Owner: State of New Mexico	API No. 30-015-27735
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## LOCATION OF RELEASE

Unit Letter K	Section 36	Township 22S	Range 30E	Feet from the 1980	North/South Line South	Feet from the 2310	East/West Line West	County Eddy
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Latitude 32.346409° Longitude -103.835868°

## NATURE OF RELEASE

Type of Release Produced Water	Volume of Release 290 bbls	Volume Recovered 240 bbls
Source of Release Water Transfer Pump	Date and Hour of Occurrence 9/18/2015 at 6:30 pm	Date and Hour of Discovery 9/18/2015 at 7 pm
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Mike Bratcher and Heather Patterson	
By Whom? Tony Savoie	Date and Hour 9/19/2015 at 9:35 am	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. N/A	

If a Watercourse was Impacted, Describe Fully.\*  
N/A

Describe Cause of Problem and Remedial Action Taken.\*

Flange bolts on the south water transfer pump failed. Most of the fluids were released to zero perm containment. Pump was repaired.

Describe Area Affected and Cleanup Action Taken.\*

A total of 4235 square feet of pasture west of the containment was affected. The leak occurred within a previously remediated area containing a 20 mil plastic liner approximately 3 feet below ground surface. Vacuum truck recovered standing fluids.

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

Signature: <i>[Signature]</i>	OIL CONSERVATION DIVISION	
Printed Name: Amy Ruth	Signed By: <i>[Signature]</i> Approved by Environmental Specialist:	
Title: Assistant Remediation Foreman	Approval Date: <u>9/24/15</u>	Expiration Date: <u>N/A</u>
E-mail Address: ACRuth@basspet.com	Conditions of Approval: Remediation per O.C.D. Rules & Guidelines	
Date: <u>9-24-15</u> Phone: 432-661-0571	Attached <input type="checkbox"/> SUBMIT REMEDIATION PROPOSAL NO LATER THAN: <u>10/25/15</u>	

\* Attach Additional Sheets If Necessary

2RP-3302

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

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

Incident ID	
District RP	2RP-3302
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party: XTO Energy, Inc	OGRID: 5380
Contact Name: Kyle Littrell	Contact Telephone: (432)-221-7331
Contact email: Kyle_Littrell@xtoenergy.com	Incident #: 2RP-3302
Contact mailing address: 522 W. Mermod, Suite 704 Carlsbad, NM 88220	

### Location of Release Source

Latitude 32.346409 Longitude -103.835868  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name James Ranch Unit #29 SWD Tank Battery	Site Type Exploration and Production
Date Release Discovered 9/18/2015	API# (if applicable) 30-015-27735

Unit Letter	Section	Township	Range	County
K	36	22S	30E	Eddy

Surface Owner: ☒ State ☐ Federal ☐ Tribal ☐ 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)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 290 bbls	Volume Recovered (bbls) 240 bbls
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

#### Cause of Release

Flange bolts on the south water transfer pump failed. Most of the fluids were released to zero perm containment. Pump was repaired.



Incident ID	
District RP	2RP-3302
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC?  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? Release volume was greater than 25 bbls.
If YES, was immediate notice given to the OCD? Yes, immediate notice was given to Mike Bratcher and Heather Patterson by Tony Savoie on 09/19/2015 at 9:35am	

## Initial Response

*The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury*

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.
If all the actions described above have <u>not</u> been undertaken, explain why:     
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.
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: <u>Kyle Littrell</u> Title: <u>SH&amp;E Supervisor</u>  Signature: _____ Date: <u>4-28-2020</u>  email: <u>Kyle_Littrell@xtoenergy.com</u> Telephone: <u>432-221-7331</u>
<b><u>OCD Only</u></b>  Received by: _____ Date: _____

Incident ID	
District RP	2RP-3302
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?	<u>&gt; 100</u> (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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
- ☒ Topographic/Aerial maps
- ☒ Laboratory data including chain of custody

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.

State of New Mexico  
Oil Conservation Division

Page 4

Incident ID	
District RP	2RP-3302
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: \_\_\_\_\_ Date: 4/28/2020

email: Kyle Littrell@xtoenergy.com Telephone: (432)-221-7331

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Incident ID	
District RP	2RP-3302
Facility ID	
Application ID	

## Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

**Closure Report Attachment Checklist:** *Each of the following items must be included in the closure report.*

- ☒ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☒ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☒ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☒ Description of remediation activities

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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Kyle Littrell Title: SH&E Supervisor

Signature: \_\_\_\_\_ Date: 4-28-2020

email: Kyle\_Littrell@xtoenergy.com Telephone: 432-221-7331

### OCD Only

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

ARTESIA DISTRICT

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

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

JUN 07 2016

Form C-141  
Revised August 8, 2011

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

RECEIVED

## Release Notification and Corrective Action

**OPERATOR** ☒ Initial Report ☐ Final Report

Name of Company: BOPCO, L.P. **2100737** Contact: Amy Ruth  
Address: 522 W. Mermod, Suite 704 Carlsbad, N.M. 88220 Telephone No. 575-887-7329  
Facility Name: James Ranch Unit 29 SWD Facility Type: Exploration and Production

Surface Owner: State Mineral Owner: State API No. 30-015-27735

## LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
K	36	22S	30E	1840	South	2184	West	Eddy

Latitude 32.346457° Longitude -103.835847°

## NATURE OF RELEASE

Type of Release	Produced Water	Volume of Release	775 bbls	Volume Recovered	760 bbls
Source of Release	Produced Water Tanks	Date and Hour of Occurrence	Unknown	Date and Hour of Discovery	5/27/2016 10 am
Was Immediate Notice Given?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	Mike Bratcher/Heather Patterson (NMOCD)		
By Whom?	Amy Ruth	Date and Hour	5/27/2016 2:58 pm		
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	N/A		

If a Watercourse was Impacted, Describe Fully.\*  
N/A

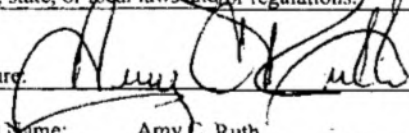
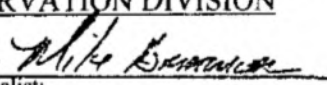
## Describe Cause of Problem and Remedial Action Taken.\*

Location VSAT (satellite) was damaged and caused SCADA communication to fail. Failure triggered an alarm that was not responded to by the proper personnel. Produced water tanks overflowed into zero perm containment. After filling containment, fluids began overflowing onto location well pad. Satellite was repaired.

## Describe Area Affected and Cleanup Action Taken.\*

The leak affected 2,212 sq. ft. of location well pad and 688 sq. ft. of pasture west of the caliche pad. Standing fluids were recovered by vacuum trucks.

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

Signature: 	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Amy C. Ruth	Signed By  Approved by Environmental Specialist:	
Title: EHS Remediation Specialist	Approval Date: 6/8/16	Expiration Date: N/A
E-mail Address: ACRuth@basspet.com	Conditions of Approval: Attached <input type="checkbox"/>	
Date: 6/7/2016 Phone: 432-661-0571	<b>Remediation per O.C.D. Rules &amp; Guidelines</b>	

\* Attach Additional Sheets If Necessary

**SUBMIT REMEDIATION PROPOSAL NO  
LATER THAN:** 7/19/16 **2RP-37260**



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

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

Incident ID	
District RP	2RP-3726
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party: XTO Energy, Inc	OGRID: 5380
Contact Name: Kyle Littrell	Contact Telephone: (432)-221-7331
Contact email: <a href="mailto:Kyle.Littrell@xtoenergy.com">Kyle.Littrell@xtoenergy.com</a>	Incident #: 2RP-3726
Contact mailing address: 522 W. Mermod, Suite 704 Carlsbad, NM 88220	

### Location of Release Source

Latitude 32.346609 Longitude -103.835868  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name James Ranch Unit 29 SWD	Site Type Exploration and Production
Date Release Discovered 5/27/2016	API# (if applicable) 30-015-27735

Unit Letter	Section	Township	Range	County
K	36	22S	30E	Eddy

Surface Owner: ☒ State ☐ Federal ☐ Tribal ☐ 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)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 775 bbls	Volume Recovered (bbls) 760 bbls
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

#### Cause of Release

Location VSTA (satellite) was damaged and caused SCADA communication to fail. Failure triggered an alarm that was not responded to by the proper personnel. Produced water tanks overflowed into zero perm containment, fluids began overflowing onto location well pad. Satellite was repaired.

Incident ID	
District RP	2RP-3726
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC?  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? Release volume was greater than 25 bbls.
If YES, was immediate notice given to the OCD? Yes, immediate notice was given to Mike Bratcher and Heather Patterson of NMOCD by Amy Ruth on 05/27/2016 at 2:58pm	

## Initial Response

*The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury*

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why:          	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
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: <u>Kyle Littrell</u>	Title: <u>SH&amp;E Supervisor</u>
Signature: _____	Date: <u>4-28-2020</u>
email: <u>Kyle_Littrell@xtoenergy.com</u>	Telephone: <u>432-221-7331</u>
<b><u>OCD Only</u></b>  Received by: _____ Date: _____	

Incident ID	
District RP	2RP-3726
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?	<u>&gt; 100</u> (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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
- ☒ Topographic/Aerial maps
- ☒ Laboratory data including chain of custody

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.

State of New Mexico  
Oil Conservation Division

Page 4

Incident ID	
District RP	2RP-3726
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: \_\_\_\_\_ Date: 4/28/2020

email: Kyle Littrell@xtoenergy.com Telephone: (432)-221-7331

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Incident ID	
District RP	2RP-3726
Facility ID	
Application ID	

## Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

**Closure Report Attachment Checklist:** *Each of the following items must be included in the closure report.*

- ☒ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☒ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☒ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☒ Description of remediation activities

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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Kyle Littrell Title: SH&E Supervisor

Signature: \_\_\_\_\_ Date: 4-28-2020

email: Kyle\_Littrell@xtoenergy.com Telephone: 432-221-7331

### OCD Only

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_



District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

## NM OIL CONSERVATION

ARTESIA DISTRICT

Form C-141  
Revised August 8, 2011

DEC 19 2016  
Submit Copy to appropriate District Office in accordance with 19.15.29 NMAC.

RECEIVED

## Release Notification and Corrective Action

## OPERATOR

☒ Initial Report ☐ Final Report

*NAB 11635456735*

Name of Company: BOPCO, L.P. <i>260737</i>	Contact: Amy Ruth
Address: 522 W. Mermod, Suite 704 Carlsbad, N.M. 88220	Telephone No. 575-887-7329
Facility Name: JRU 29 SWD Battery at JRU well #29	Facility Type: Exploration and Production

Surface Owner: State of New Mexico	Mineral Owner: State of New Mexico	API No. 30-015-27735
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## LOCATION OF RELEASE

Unit Letter K	Section 36	Township 22S	Range 30E	Feet from the 1845	North/South Line South	Feet from the 2160	East/West Line West	County Eddy
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Latitude 32.346427° Longitude -103.835871°

## NATURE OF RELEASE

Type of Release Produced Water	Volume of Release 3324 bbls	Volume Recovered 2990 bbls
Source of Release Water transfer pump	Date and Hour of Occurrence Unknown	Date and Hour of Discovery 12/1/2016 approx. 9 am
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Mike Bratcher and Heather Patterson (NMOCD)	
By Whom? Amy Ruth	Date and Hour 12/1/2016 4:52 pm	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. N/A	

If a Watercourse was Impacted, Describe Fully.\*  
N/A

Describe Cause of Problem and Remedial Action Taken.\*

Release was due to a water transfer pump failure resulting in damage to pump fiberglass line. Fluids overflowed containment. Pump was isolated for repair.

Describe Area Affected and Cleanup Action Taken.\*

The leak affected 56,043 square feet (33,938 square feet of this is in pasture). Standing fluids were recovered from the ground. Saturated surface soils were scraped and stockpiled on bermed plastic located on the caliche pad.

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

Signature: <i>[Signature]</i>	OIL CONSERVATION DIVISION	
Printed Name: Amy C. Ruth	Approved by Environmental Specialist: <i>[Signature]</i>	
Title: EHS Environmental Supervisor	Approval Date:	Expiration Date:
E-mail Address: ACRuth@basspet.com	Conditions of Approval: <i>see attached</i>	Attached <input checked="" type="checkbox"/>
Date: 12/16/2016	Phone: 432-661-0571	

\* Attach Additional Sheets If Necessary

2RP-4040

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

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

Incident ID	
District RP	2RP-4040
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party: XTO Energy, Inc	OGRID: 5380
Contact Name: Kyle Littrell	Contact Telephone: (432)-221-7331
Contact email: Kyle_Littrell@xtoenergy.com	Incident #: 2RP-4040
Contact mailing address: 522 W. Mermod, Suite 704 Carlsbad, NM 88220	

### Location of Release Source

Latitude 32.346427 Longitude -103.835871  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name JRU 29 SWD Battery at JRU well #29	Site Type Exploration and Production
Date Release Discovered 12/1/2016	API# (if applicable) 30-015-27735

Unit Letter	Section	Township	Range	County
K	36	22S	30E	Eddy

Surface Owner: ☒ State ☐ Federal ☐ Tribal ☐ 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)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 3,324 bbls	Volume Recovered (bbls) 2,990 bbls
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

#### Cause of Release

Release was due to a water transfer pump failure resulting in damage to pump fiberglass line. Fluids overflowed containment. Pump was isolated for repair.

Incident ID	
District RP	2RP-4040
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC?  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? Release volume was greater than 25 bbls.
If YES, was immediate notice given to the OCD? Yes, immediate notice was given to Mike Bratcher and Heather Patterson of NMOCD by Amy Ruth on 12/01/2016 at 4:52pm.	

### Initial Response

*The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury*

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why:          	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
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: <u>Kyle Littrell</u>	Title: <u>SH&amp;E Supervisor</u>
Signature: _____	Date: <u>4-28-2020</u>
email: <u>Kyle_Littrell@xtoenergy.com</u>	Telephone: <u>432-221-7331</u>
<b><u>OCD Only</u></b>  Received by: _____ Date: _____	

Incident ID	
District RP	2RP-4040
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?	<u>&gt; 100</u> (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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
- ☒ Topographic/Aerial maps
- ☒ Laboratory data including chain of custody

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.

State of New Mexico  
Oil Conservation Division

Page 4

Incident ID	
District RP	2RP-4040
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: \_\_\_\_\_ Date: 4/28/2020

email: Kyle Littrell@xtoenergy.com Telephone: (432)-221-7331

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_



Incident ID	
District RP	2RP-4040
Facility ID	
Application ID	

## Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

**Closure Report Attachment Checklist:** *Each of the following items must be included in the closure report.*

- ☒ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☒ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☒ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☒ Description of remediation activities

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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Kyle Littrell Title: SH&E Supervisor

Signature: \_\_\_\_\_ Date: 4-28-2020

email: Kyle\_Littrell@xtoenergy.com Telephone: 432-221-7331

### OCD Only


Received by: \_\_\_\_\_ Date: \_\_\_\_\_


Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.


Closure Approved by: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

ATTACHMENT 3: LITHOLOGIC / SOIL SAMPLE LOGS

 <b>LT Environmental, Inc.</b> 508 West Stevens Street Carlsbad, New Mexico 88220 Compliance · Engineering · Remediation		Identifier: BH01	Date: 1/18-1/21/20					
		Project Name: JRU 29	RP Number: 2RP-3302, 2RP-3726, 2RP-4040, 2RP-3082					
<b>LITHOLOGIC / SOIL SAMPLING LOG</b>		Logged By: BB, FS, WM	Method: Sonic Drill					
Lat/Long:		Field Screening: NA	Hole Diameter: 6"					
Total Depth:		110'						
Comments: No field screenings, lithology remarks only								
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample #	Depth (ft. bgs.)	Sample Depth	Soil/Rock Type	Lithology/Remarks
D			N		0'	0'	CCHE	CALICHE, tan-off white, fill
					0.5'	0.5'	SP	SAND, dry, reddish brown, poorly graded, fine-very fine, soft no odor, no stain
D			N		5'	5'	CCHE	CALICHE, dry, tan-off white, few subangular gravel, trace fine sand, no odor, no stain
D			N		12.5'	12.5'	SP-SM	silty SAND, dry, reddish brown, poorly graded, fine grained, few tan-off white subangular gravel, no stain, no odor
D			N		23'	23'	ML-S	SILTSTONE, dry, reddish brown, moderately consolidated, 2mm caliche inclusions, trace off-white subangular gravel, no stain, no odor
D			N		37'	37'		moist
M			N		45'	45'		dry
D			N		58'	58'	CL-S	CLAYSTONE, dry, reddish brown, low plasticity, cohesive, well consolidated with some silty dolomite inclusions (1-2mm), no stain, no odor
D			N		102'	102'		moist
D			N		110'	110'		Total Depth 110 feet bgs

 <b>LT Environmental, Inc.</b> 508 West Stevens Street Carlsbad, New Mexico 88220 Compliance · Engineering · Remediation		Identifier: SP-11	Date: 1/21/2020					
		Project Name: JRU 29	RP Number: 2RP-3302, 2RP-3726, 2RP-4040, 2RP-3802					
<b>LITHOLOGIC / SOIL SAMPLING LOG</b>		Logged By: BB, FS	Method: Sonic Drill					
Lat/Long:		Field Screening: Chloride, PID	Hole Diameter: 4"					
Total Depth: 26'								
Comments: All chloride tests include a 40% correction factor								
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample #	Depth (ft. bgs.)	Sample Depth	Soil/Rock Type	Lithology/Remarks
					0			Open Excavation
D	475	0.0	N		3'	4'	CCHE	CALICHE, dry, tan-off white, few subangular gravel, trace fine sand, moderately consolidated, no syain, no odor
D	425	0.4	N		9'			
D	>3628	0.4	N		13'		SP	SAND, dry, reddish brown, poorly graded, fine grained, no odor no stain
M	5,958	0.2	N		18'		SM	SILTY sand, moist, reddish brown, poorly graded, no plasticity, non cohesive, no odor, no stain
M	<120	1.2	N	SP-11	23'			
M	<120	2.3	N	SP-11A	24'			
M	<120	0.5	N	SP-11B	25'			
M	168	1.2	N	SP-11C	26'			Total Depth 26 feet bgs
					30			
					36			

 <b>LT Environmental, Inc.</b> 508 West Stevens Street Carlsbad, New Mexico 88220 Compliance · Engineering · Remediation					Identifier: SP-12		Date: 1/21/2020		
					Project Name: JRU 29		RP Number: 2RP-3302, 2RP-3726, 2RP-4040, 2RP-3082		
<b>LITHOLOGIC / SOIL SAMPLING LOG</b>					Logged By: BB, FS		Method: Sonic Drill		
Lat/Long:				Field Screening: Chloride, PID		Hole Diameter: 4"		Total Depth: 14'	
Comments: All chloride tests include a 40% correction factor									
Moisture Content	Chloride (ppm)	Vapor (ppm)	Staining	Sample #	Depth (ft. bgs.)	Sample Depth	Soil/Rock Type	Lithology/Remarks	
					0				
						3'	CCHE	CALICHE, dry tan-off white, moderately consolidated w/ trace fine grained sand, no stain, no odor	
D	1,008	0.0	N	SP-12		4'			
D	1719	0.2	N	SP-12A		5'			
D	1,092	0.2	N	SP-12B	6	6'			
D	929	0.2	N	SP-12C		7'			
M	1,282	0.3	N	SP-12D		8'	SP	SAND, moist, brown-redish brown, poorly graded, fine grained w/ trace gravel, no stain, no odor	
M	543	0.0	N	SP-12E		9'			
M	672	0.2	N	SP-12F	10	10'			
M	<120	2.8	N	SP-12G		11'			
M	<120	4.0	N	SP-12H		12'			
M	<120	4.0	N	SP-12I		13'			
M	<120	2.8	N	SP-12J	14	14'		Total Depth 14 feet bgs	
					18				
					22				
					26				



ATTACHMENT 4: PHOTOGRAPHIC LOG



## PHOTOGRAPHIC LOG



**Photograph 1:** East facing view of open excavation.



**Photograph 2:** West facing view of open excavation.



**Photograph 3:** North facing view of open excavation



**Photograph 4:** Previously installed liner near SP-4 exposed.

JRU 29 SWD Tank Battery  
Eddy County, New Mexico  
Photographs Taken: July 2018 through March 2020



## PHOTOGRAPHIC LOG



**Photograph 5:** North facing view of previously installed liner exposed.



**Photograph 6:** West facing view of excavation area at SP-7.



**Photograph 7:** East facing view during backfilling activities.



**Photograph 8:** North facing view during backfilling activities

ATTACHMENT 5: LABORATORY ANALYTICAL REPORTS

# Analytical Report 649845

for  
LT Environmental, Inc.

Project Manager: Dan Moir

JRU 29

012918135

31-JAN-20

Collected By: Client



1089 N Canal Street  
Carlsbad, NM 88220

Xenco-Houston (EPA Lab Code: TX00122):

Texas (T104704215-19-30), Arizona (AZ0765), Florida (E871002-24), Louisiana (03054)  
Oklahoma (2019-058), North Carolina (681), Arkansas (19-037-0)

Xenco-Dallas (EPA Lab Code: TX01468):

Texas (TX104704295-19-22), Arizona (AZ0809), Arkansas (17-063-0)

Xenco-El Paso (EPA Lab Code: TX00127): Texas (T104704221-19-16)

Xenco-Lubbock (EPA Lab Code: TX00139): Texas (T104704219-19-21)

Xenco-Midland (EPA Lab Code: TX00158): Texas (T104704400-19-19)

Xenco-Carlsbad (LELAP): Louisiana (05092)

Xenco-San Antonio (EPA Lab Code: TNI02385): Texas (T104704534-19-5)

Xenco Phoenix (EPA Lab Code: AZ00901): Arizona (AZ0757)

Xenco-Tampa: Florida (E87429), North Carolina (483)



31-JAN-20

Project Manager: **Dan Moir**

**LT Environmental, Inc.**

4600 W. 60th Avenue

Arvada, CO 80003

Reference: XENCO Report No(s): **649845**

**JRU 29**

Project Address:

**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 XENCO Report Number(s) 649845. 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 XENCO Laboratories. 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. 649845 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 XENCO Laboratories to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

A handwritten signature in black ink that reads 'Jessica Kramer'.

---

**Jessica Kramer**

Project Assistant

***Recipient of the Prestigious Small Business Administration Award of Excellence in 1994.***

*Certified and approved by numerous States and Agencies.*

*A Small Business and Minority Status Company that delivers SERVICE and QUALITY*

Houston - Dallas - Midland - San Antonio - Phoenix - Oklahoma - Latin America



**Sample Cross Reference 649845****LT Environmental, Inc., Arvada, CO**

JRU 29

<b>Sample Id</b>	<b>Matrix</b>	<b>Date Collected</b>	<b>Sample Depth</b>	<b>Lab Sample Id</b>
SP-11	S	01-21-20 13:03	23 ft	649845-001
SP-11 A	S	01-21-20 13:05	24 ft	649845-002
SP-11 B	S	01-21-20 13:24	25 ft	649845-003
SP-11 C	S	01-21-20 13:26	26 ft	649845-004



## CASE NARRATIVE

**Client Name:** *LT Environmental, Inc.*

**Project Name:** *JRU 29*

Project ID: 012918135

Work Order Number(s): 649845

Report Date: 31-JAN-20

Date Received: 01/22/2020

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**Sample receipt non conformances and comments:**

---

**Sample receipt non conformances and comments per sample:**

None

**Analytical non conformances and comments:**

Batch: LBA-3115058 BTEX by EPA 8021B

Soil samples were not received in Terracore kits and therefore were prepared by method 5030.



# Certificate of Analysis Summary 649845

LT Environmental, Inc., Arvada, CO

Project Name: JRU 29

Project Id: 012918135

Contact: Dan Moir

Project Location:

Date Received in Lab: Wed Jan-22-20 09:45 am

Report Date: 31-JAN-20

Project Manager: Jessica Kramer

<i>Analysis Requested</i>	<i>Lab Id:</i>	649845-001	649845-002	649845-003	649845-004		
	<i>Field Id:</i>	SP-11	SP-11 A	SP-11 B	SP-11 C		
	<i>Depth:</i>	23- ft	24- ft	25- ft	26- ft		
	<i>Matrix:</i>	SOIL	SOIL	SOIL	SOIL		
	<i>Sampled:</i>	Jan-21-20 13:03	Jan-21-20 13:05	Jan-21-20 13:24	Jan-21-20 13:26		
<b>BTEX by EPA 8021B SUB: T104704400-19-19</b>	<i>Extracted:</i>	Jan-30-20 10:00	Jan-30-20 10:00	Jan-30-20 10:00	Jan-30-20 10:00		
	<i>Analyzed:</i>	Jan-30-20 14:52	Jan-30-20 15:52	Jan-30-20 16:12	Jan-30-20 16:33		
	<i>Units/RL:</i>	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL		
Benzene		<0.00199 0.00199	<0.00198 0.00198	<0.00200 0.00200	<0.00201 0.00201		
Toluene		<0.00199 0.00199	<0.00198 0.00198	<0.00200 0.00200	<0.00201 0.00201		
Ethylbenzene		<0.00199 0.00199	<0.00198 0.00198	<0.00200 0.00200	<0.00201 0.00201		
m,p-Xylenes		<0.00398 0.00398	<0.00397 0.00397	<0.00399 0.00399	<0.00402 0.00402		
o-Xylene		<0.00199 0.00199	<0.00198 0.00198	<0.00200 0.00200	<0.00201 0.00201		
Total Xylenes		<0.00199 0.00199	<0.00198 0.00198	<0.00200 0.00200	<0.00201 0.00201		
Total BTEX		<0.00199 0.00199	<0.00198 0.00198	<0.00200 0.00200	<0.00201 0.00201		
<b>Chloride by EPA 300 SUB: T104704400-19-19</b>	<i>Extracted:</i>	Jan-23-20 17:45	Jan-23-20 17:45	Jan-23-20 17:45	Jan-23-20 17:45		
	<i>Analyzed:</i>	Jan-23-20 23:27	Jan-24-20 00:32	Jan-24-20 00:38	Jan-24-20 00:57		
	<i>Units/RL:</i>	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL		
Chloride		32.9 4.97	157 5.05	289 4.96	216 4.95		
<b>TPH by SW8015 Mod SUB: T104704400-19-19</b>	<i>Extracted:</i>	Jan-25-20 16:00	Jan-25-20 16:00	Jan-25-20 16:00	Jan-25-20 16:00		
	<i>Analyzed:</i>	Jan-26-20 19:01	Jan-26-20 19:22	Jan-26-20 19:43	Jan-26-20 20:04		
	<i>Units/RL:</i>	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL		
Gasoline Range Hydrocarbons (GRO)		<50.0 50.0	<49.8 49.8	<50.0 50.0	<50.0 50.0		
Diesel Range Organics (DRO)		<50.0 50.0	<49.8 49.8	<50.0 50.0	<50.0 50.0		
Motor Oil Range Hydrocarbons (MRO)		<50.0 50.0	<49.8 49.8	<50.0 50.0	<50.0 50.0		
Total GRO-DRO		<50.0 50.0	<49.8 49.8	<50.0 50.0	<50.0 50.0		
Total TPH		<50.0 50.0	<49.8 49.8	<50.0 50.0	<50.0 50.0		

This analytical report, and the entire data package it represents, has been made for your exclusive and confidential use. The interpretations and results expressed throughout this analytical report represent the best judgment of XENCO Laboratories. XENCO Laboratories assumes no responsibility and makes no warranty to the end use of the data hereby presented. Our liability is limited to the amount invoiced for this work order unless otherwise agreed to in writing.

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

Jessica Kramer  
Project Assistant



## Certificate of Analytical Results 649845

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-11**  
 Lab Sample Id: 649845-001

Matrix: Soil  
 Date Collected: 01.21.20 13.03

Date Received: 01.22.20 09.45  
 Sample Depth: 23 ft

Analytical Method: Chloride by EPA 300

Tech: CHE

Analyst: CHE

Seq Number: 3114316

Date Prep: 01.23.20 17.45

Prep Method: E300P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	32.9	4.97	mg/kg	01.23.20 23.27		1

Analytical Method: TPH by SW8015 Mod

Tech: DVM

Analyst: ARM

Seq Number: 3114519

Date Prep: 01.25.20 16.00

Prep Method: SW8015P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Gasoline Range Hydrocarbons (GRO)	PHC610	<50.0	50.0	mg/kg	01.26.20 19.01	U	1
Diesel Range Organics (DRO)	C10C28DRO	<50.0	50.0	mg/kg	01.26.20 19.01	U	1
Motor Oil Range Hydrocarbons (MRO)	PHCG2835	<50.0	50.0	mg/kg	01.26.20 19.01	U	1
Total GRO-DRO	PHC628	<50.0	50.0	mg/kg	01.26.20 19.01	U	1
Total TPH	PHC635	<50.0	50.0	mg/kg	01.26.20 19.01	U	1

Surrogate	Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
1-Chlorooctane	111-85-3	105	%	70-135	01.26.20 19.01	
o-Terphenyl	84-15-1	102	%	70-135	01.26.20 19.01	



# Certificate of Analytical Results 649845

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-11**  
Lab Sample Id: 649845-001

Matrix: Soil  
Date Collected: 01.21.20 13.03

Date Received: 01.22.20 09.45  
Sample Depth: 23 ft

Analytical Method: BTEX by EPA 8021B

Tech: KTL

Analyst: KTL

Seq Number: 3115058

Prep Method: SW5030B

% Moisture:

Date Prep: 01.30.20 10.00

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Benzene	71-43-2	<0.00199	0.00199	mg/kg	01.30.20 14.52	U	1
Toluene	108-88-3	<0.00199	0.00199	mg/kg	01.30.20 14.52	U	1
Ethylbenzene	100-41-4	<0.00199	0.00199	mg/kg	01.30.20 14.52	U	1
m,p-Xylenes	179601-23-1	<0.00398	0.00398	mg/kg	01.30.20 14.52	U	1
o-Xylene	95-47-6	<0.00199	0.00199	mg/kg	01.30.20 14.52	U	1
Total Xylenes	1330-20-7	<0.00199	0.00199	mg/kg	01.30.20 14.52	U	1
Total BTEX		<0.00199	0.00199	mg/kg	01.30.20 14.52	U	1
<b>Surrogate</b>	<b>Cas Number</b>	<b>% Recovery</b>	<b>Units</b>	<b>Limits</b>	<b>Analysis Date</b>	<b>Flag</b>	
4-Bromofluorobenzene	460-00-4	79	%	70-130	01.30.20 14.52		
1,4-Difluorobenzene	540-36-3	113	%	70-130	01.30.20 14.52		



# Certificate of Analytical Results 649845

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-11 A**  
Lab Sample Id: 649845-002

Matrix: Soil  
Date Collected: 01.21.20 13.05

Date Received: 01.22.20 09.45  
Sample Depth: 24 ft

Analytical Method: Chloride by EPA 300

Tech: CHE

Analyst: CHE

Seq Number: 3114316

Date Prep: 01.23.20 17.45

Prep Method: E300P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	157	5.05	mg/kg	01.24.20 00.32		1

Analytical Method: TPH by SW8015 Mod

Tech: DVM

Analyst: ARM

Seq Number: 3114519

Date Prep: 01.25.20 16.00

Prep Method: SW8015P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Gasoline Range Hydrocarbons (GRO)	PHC610	<49.8	49.8	mg/kg	01.26.20 19.22	U	1
Diesel Range Organics (DRO)	C10C28DRO	<49.8	49.8	mg/kg	01.26.20 19.22	U	1
Motor Oil Range Hydrocarbons (MRO)	PHCG2835	<49.8	49.8	mg/kg	01.26.20 19.22	U	1
Total GRO-DRO	PHC628	<49.8	49.8	mg/kg	01.26.20 19.22	U	1
Total TPH	PHC635	<49.8	49.8	mg/kg	01.26.20 19.22	U	1

Surrogate	Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
1-Chlorooctane	111-85-3	102	%	70-135	01.26.20 19.22	
o-Terphenyl	84-15-1	99	%	70-135	01.26.20 19.22	





# Certificate of Analytical Results 649845

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-11 A**  
Lab Sample Id: 649845-002

Matrix: Soil  
Date Collected: 01.21.20 13.05

Date Received: 01.22.20 09.45  
Sample Depth: 24 ft

Analytical Method: BTEX by EPA 8021B

Tech: KTL

Analyst: KTL

Seq Number: 3115058

Date Prep: 01.30.20 10.00

Prep Method: SW5030B

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Benzene	71-43-2	<0.00198	0.00198	mg/kg	01.30.20 15.52	U	1
Toluene	108-88-3	<0.00198	0.00198	mg/kg	01.30.20 15.52	U	1
Ethylbenzene	100-41-4	<0.00198	0.00198	mg/kg	01.30.20 15.52	U	1
m,p-Xylenes	179601-23-1	<0.00397	0.00397	mg/kg	01.30.20 15.52	U	1
o-Xylene	95-47-6	<0.00198	0.00198	mg/kg	01.30.20 15.52	U	1
Total Xylenes	1330-20-7	<0.00198	0.00198	mg/kg	01.30.20 15.52	U	1
Total BTEX		<0.00198	0.00198	mg/kg	01.30.20 15.52	U	1
<b>Surrogate</b>	<b>Cas Number</b>	<b>% Recovery</b>	<b>Units</b>	<b>Limits</b>	<b>Analysis Date</b>	<b>Flag</b>	
4-Bromofluorobenzene	460-00-4	98	%	70-130	01.30.20 15.52		
1,4-Difluorobenzene	540-36-3	114	%	70-130	01.30.20 15.52		



# Certificate of Analytical Results 649845

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-11 B**  
 Lab Sample Id: 649845-003

Matrix: Soil  
 Date Collected: 01.21.20 13.24

Date Received: 01.22.20 09.45  
 Sample Depth: 25 ft

Analytical Method: Chloride by EPA 300

Tech: CHE

Analyst: CHE

Seq Number: 3114316

Date Prep: 01.23.20 17.45

Prep Method: E300P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	289	4.96	mg/kg	01.24.20 00.38		1

Analytical Method: TPH by SW8015 Mod

Tech: DVM

Analyst: ARM

Seq Number: 3114519

Date Prep: 01.25.20 16.00

Prep Method: SW8015P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Gasoline Range Hydrocarbons (GRO)	PHC610	<50.0	50.0	mg/kg	01.26.20 19.43	U	1
Diesel Range Organics (DRO)	C10C28DRO	<50.0	50.0	mg/kg	01.26.20 19.43	U	1
Motor Oil Range Hydrocarbons (MRO)	PHCG2835	<50.0	50.0	mg/kg	01.26.20 19.43	U	1
Total GRO-DRO	PHC628	<50.0	50.0	mg/kg	01.26.20 19.43	U	1
Total TPH	PHC635	<50.0	50.0	mg/kg	01.26.20 19.43	U	1

**Surrogate**

1-Chlorooctane

o-Terphenyl

Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
111-85-3	100	%	70-135	01.26.20 19.43	
84-15-1	96	%	70-135	01.26.20 19.43	



# Certificate of Analytical Results 649845

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-11 B**  
Lab Sample Id: 649845-003

Matrix: Soil  
Date Collected: 01.21.20 13.24

Date Received: 01.22.20 09.45  
Sample Depth: 25 ft

Analytical Method: BTEX by EPA 8021B

Tech: KTL

Analyst: KTL

Seq Number: 3115058

Prep Method: SW5030B

% Moisture:

Date Prep: 01.30.20 10.00

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Benzene	71-43-2	<0.00200	0.00200	mg/kg	01.30.20 16.12	U	1
Toluene	108-88-3	<0.00200	0.00200	mg/kg	01.30.20 16.12	U	1
Ethylbenzene	100-41-4	<0.00200	0.00200	mg/kg	01.30.20 16.12	U	1
m,p-Xylenes	179601-23-1	<0.00399	0.00399	mg/kg	01.30.20 16.12	U	1
o-Xylene	95-47-6	<0.00200	0.00200	mg/kg	01.30.20 16.12	U	1
Total Xylenes	1330-20-7	<0.00200	0.00200	mg/kg	01.30.20 16.12	U	1
Total BTEX		<0.00200	0.00200	mg/kg	01.30.20 16.12	U	1
<b>Surrogate</b>	<b>Cas Number</b>	<b>% Recovery</b>	<b>Units</b>	<b>Limits</b>	<b>Analysis Date</b>	<b>Flag</b>	
1,4-Difluorobenzene	540-36-3	112	%	70-130	01.30.20 16.12		
4-Bromofluorobenzene	460-00-4	85	%	70-130	01.30.20 16.12		



# Certificate of Analytical Results 649845

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-11 C**  
 Lab Sample Id: 649845-004

Matrix: Soil  
 Date Collected: 01.21.20 13.26

Date Received: 01.22.20 09.45  
 Sample Depth: 26 ft

Analytical Method: Chloride by EPA 300

Tech: CHE

Analyst: CHE

Seq Number: 3114316

Date Prep: 01.23.20 17.45

Prep Method: E300P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	216	4.95	mg/kg	01.24.20 00.57		1

Analytical Method: TPH by SW8015 Mod

Tech: DVM

Analyst: ARM

Seq Number: 3114519

Date Prep: 01.25.20 16.00

Prep Method: SW8015P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Gasoline Range Hydrocarbons (GRO)	PHC610	<50.0	50.0	mg/kg	01.26.20 20.04	U	1
Diesel Range Organics (DRO)	C10C28DRO	<50.0	50.0	mg/kg	01.26.20 20.04	U	1
Motor Oil Range Hydrocarbons (MRO)	PHCG2835	<50.0	50.0	mg/kg	01.26.20 20.04	U	1
Total GRO-DRO	PHC628	<50.0	50.0	mg/kg	01.26.20 20.04	U	1
Total TPH	PHC635	<50.0	50.0	mg/kg	01.26.20 20.04	U	1

**Surrogate**

1-Chlorooctane

o-Terphenyl

Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
111-85-3	103	%	70-135	01.26.20 20.04	
84-15-1	99	%	70-135	01.26.20 20.04	



# Certificate of Analytical Results 649845

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-11 C**  
Lab Sample Id: 649845-004

Matrix: Soil  
Date Collected: 01.21.20 13.26

Date Received: 01.22.20 09.45  
Sample Depth: 26 ft

Analytical Method: BTEX by EPA 8021B

Tech: KTL

Analyst: KTL

Seq Number: 3115058

Date Prep: 01.30.20 10.00

Prep Method: SW5030B

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Benzene	71-43-2	<0.00201	0.00201	mg/kg	01.30.20 16.33	U	1
Toluene	108-88-3	<0.00201	0.00201	mg/kg	01.30.20 16.33	U	1
Ethylbenzene	100-41-4	<0.00201	0.00201	mg/kg	01.30.20 16.33	U	1
m,p-Xylenes	179601-23-1	<0.00402	0.00402	mg/kg	01.30.20 16.33	U	1
o-Xylene	95-47-6	<0.00201	0.00201	mg/kg	01.30.20 16.33	U	1
Total Xylenes	1330-20-7	<0.00201	0.00201	mg/kg	01.30.20 16.33	U	1
Total BTEX		<0.00201	0.00201	mg/kg	01.30.20 16.33	U	1
<b>Surrogate</b>	<b>Cas Number</b>	<b>% Recovery</b>	<b>Units</b>	<b>Limits</b>	<b>Analysis Date</b>	<b>Flag</b>	
4-Bromofluorobenzene	460-00-4	80	%	70-130	01.30.20 16.33		
1,4-Difluorobenzene	540-36-3	111	%	70-130	01.30.20 16.33		





## 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.

\*\* Surrogate recovered outside laboratory control limit.

**BRL** Below Reporting Limit.

**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



## LT Environmental, Inc.

JRU 29

## Analytical Method: Chloride by EPA 300

Seq Number: 3114316

MB Sample Id: 7695087-1-BLK

Matrix: Solid

LCS Sample Id: 7695087-1-BKS

Prep Method: E300P

Date Prep: 01.23.20

LCSD Sample Id: 7695087-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	<0.858	250	256	102	257	103	90-110	0	20	mg/kg	01.23.20 23:14	

## Analytical Method: Chloride by EPA 300

Seq Number: 3114316

Parent Sample Id: 649845-001

Matrix: Soil

MS Sample Id: 649845-001 S

Prep Method: E300P

Date Prep: 01.23.20

MSD Sample Id: 649845-001 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	32.9	249	299	107	296	106	90-110	1	20	mg/kg	01.23.20 23:33	

## Analytical Method: Chloride by EPA 300

Seq Number: 3114316

Parent Sample Id: 649845-004

Matrix: Soil

MS Sample Id: 649845-004 S

Prep Method: E300P

Date Prep: 01.23.20

MSD Sample Id: 649845-004 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	216	248	459	98	460	98	90-110	0	20	mg/kg	01.24.20 01:04	

## Analytical Method: TPH by SW8015 Mod

Seq Number: 3114519

MB Sample Id: 7695243-1-BLK

Matrix: Solid

LCS Sample Id: 7695243-1-BKS

Prep Method: SW8015P

Date Prep: 01.25.20

LCSD Sample Id: 7695243-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Gasoline Range Hydrocarbons (GRO)	<15.0	1000	808	81	917	92	70-135	13	20	mg/kg	01.26.20 11:59	
Diesel Range Organics (DRO)	<15.0	1000	814	81	926	93	70-135	13	20	mg/kg	01.26.20 11:59	

## Surrogate

	MB %Rec	MB Flag	LCS %Rec	LCS Flag	LCSD %Rec	LCSD Flag	Limits	Units	Analysis Date
1-Chlorooctane	110		105		119		70-135	%	01.26.20 11:59
o-Terphenyl	110		104		117		70-135	%	01.26.20 11:59

## Analytical Method: TPH by SW8015 Mod

Seq Number: 3114519

Matrix: Solid

MB Sample Id: 7695243-1-BLK

Prep Method: SW8015P

Date Prep: 01.25.20

Parameter	MB Result	Units	Analysis Date	Flag
Motor Oil Range Hydrocarbons (MRO)	<50.0	mg/kg	01.26.20 11:38	

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

$[D] = 100 * (C-A) / B$   
 $RPD = 200 * |(C-E) / (C+E)|$   
 $[D] = 100 * (C) / [B]$   
 Log Diff. = Log(Sample Duplicate) - Log(Original Sample)

LCS = Laboratory Control Sample  
A = Parent Result  
C = MS/LCS Result  
E = MSD/LCSD Result

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



## LT Environmental, Inc.

JRU 29

## Analytical Method: TPH by SW8015 Mod

Seq Number: 3114519

Parent Sample Id: 649839-001

Matrix: Soil

MS Sample Id: 649839-001 S

Prep Method: SW8015P

Date Prep: 01.25.20

MSD Sample Id: 649839-001 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Gasoline Range Hydrocarbons (GRO)	<15.0	997	831	83	841	84	70-135	1	20	mg/kg	01.26.20 13:03	
Diesel Range Organics (DRO)	17.8	997	824	81	839	82	70-135	2	20	mg/kg	01.26.20 13:03	

## Surrogate

	MS %Rec	MS Flag	MSD %Rec	MSD Flag	Limits	Units	Analysis Date
1-Chlorooctane	113		102		70-135	%	01.26.20 13:03
o-Terphenyl	93		97		70-135	%	01.26.20 13:03

## Analytical Method: BTEX by EPA 8021B

Seq Number: 3115058

MB Sample Id: 7695528-1-BLK

Matrix: Solid

LCS Sample Id: 7695528-1-BKS

Prep Method: SW5030B

Date Prep: 01.30.20

LCSD Sample Id: 7695528-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Benzene	<0.000385	0.100	0.107	107	0.110	110	70-130	3	35	mg/kg	01.30.20 12:32	
Toluene	<0.000456	0.100	0.101	101	0.106	106	70-130	5	35	mg/kg	01.30.20 12:32	
Ethylbenzene	<0.000565	0.100	0.0956	96	0.102	102	70-130	6	35	mg/kg	01.30.20 12:32	
m,p-Xylenes	<0.00101	0.200	0.186	93	0.200	100	70-130	7	35	mg/kg	01.30.20 12:32	
o-Xylene	<0.000344	0.100	0.0943	94	0.0980	98	70-130	4	35	mg/kg	01.30.20 12:32	

## Surrogate

	MB %Rec	MB Flag	LCS %Rec	LCS Flag	LCSD %Rec	LCSD Flag	Limits	Units	Analysis Date
1,4-Difluorobenzene	110		110		112		70-130	%	01.30.20 12:32
4-Bromofluorobenzene	79		85		88		70-130	%	01.30.20 12:32

## Analytical Method: BTEX by EPA 8021B

Seq Number: 3115058

Parent Sample Id: 649845-001

Matrix: Soil

MS Sample Id: 649845-001 S

Prep Method: SW5030B

Date Prep: 01.30.20

MSD Sample Id: 649845-001 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Benzene	<0.000383	0.0994	0.112	113	0.102	102	70-130	9	35	mg/kg	01.30.20 13:13	
Toluene	0.000596	0.0994	0.107	107	0.0978	98	70-130	9	35	mg/kg	01.30.20 13:13	
Ethylbenzene	<0.000561	0.0994	0.103	104	0.0945	95	70-130	9	35	mg/kg	01.30.20 13:13	
m,p-Xylenes	<0.00101	0.199	0.202	102	0.184	92	70-130	9	35	mg/kg	01.30.20 13:13	
o-Xylene	0.000378	0.0994	0.0996	100	0.0925	92	70-130	7	35	mg/kg	01.30.20 13:13	

## Surrogate

	MS %Rec	MS Flag	MSD %Rec	MSD Flag	Limits	Units	Analysis Date
1,4-Difluorobenzene	115		107		70-130	%	01.30.20 13:13
4-Bromofluorobenzene	95		87		70-130	%	01.30.20 13:13

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

$[D] = 100 * (C - A) / B$   
 $RPD = 200 * |(C - E) / (C + E)|$   
 $[D] = 100 * (C) / [B]$   
 $\text{Log Diff.} = \text{Log}(\text{Sample Duplicate}) - \text{Log}(\text{Original Sample})$

LCS = Laboratory Control Sample  
 A = Parent Result  
 C = MS/LCS Result  
 E = MSD/LCSD Result

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





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Midland TX (432-704-5440) EL Paso, TX (915)585-3443 Lubbock, TX (806)794-1296  
Tampa, FL (813) 288-1111 Phoenix, AZ (480-355-0900) Atlanta GA (770-449-8800)

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## Chain of Custody

Work Order No: 1249845

Project Manager:		Dan Moir	Bill to: (if different)	Kyle Littrell
Company Name:		LT Environmental, Inc., Permian office	Company Name:	XTO Energy
Address:		3300 North A Street	Address:	3104 E Green Street
City, State ZIP:		Midland, TX 79705	City, State ZIP:	Carlsbad, NM 88220
Phone:		432.236.3849	Email:	<a href="mailto:bbeilili@ltenv.com">bbeilili@ltenv.com</a>

<b>Work Order Comments</b>	
Program: UST/PST <input type="checkbox"/> PRP <input type="checkbox"/> Brownfields <input type="checkbox"/> RC <input type="checkbox"/> Superfund <input type="checkbox"/>	
State of Project:	
Reporting Level II <input type="checkbox"/> Level III <input type="checkbox"/> PST/UST <input type="checkbox"/> RRP <input type="checkbox"/> Level IV <input type="checkbox"/>	
Deliverables: EDD <input type="checkbox"/> ADAPT <input type="checkbox"/> Other:	






[illegible][illegible]

Total	200.7 / 6010	200.8 / 6020:
8RCRA	Al Sb As Ba Be B Cd Ca Cr Co Cu Fe Pb Mg Mn Mo Ni K Se Ag SiO <sub>2</sub> Na Sr I Sn U V Zn	13PPM Texas 11 A
		4534 / 94E 41 / Z470 / Z471 . Hg

Circle Method(s) and Metal(s) to be analyzed

[illegible]

**notice:** Signature of this document and relinquishment of samples constitutes a valid purchase order from client company to Xenoco, its affiliates and subcontractors. It assigns standard terms and conditions of service. Xenoco will be liable only for the cost of samples and shall not assume any responsibility for any losses or expenses incurred by the client if such losses are due to circumstances beyond the control of service. A fee of \$72.00 will be applied to each product and a charge of \$5 for each sample submitted to Xenoco, but not analyzed. These terms will be enforced unless previously negotiated.

of Xerox. A minimum charge of \$75.00 will be applied to each project with a minimum of 250 copies. A minimum charge of \$150.00 will be applied to each project with a minimum of 500 copies.					
Relinquished by: (Signature)	Received by: (Signature)	Date/Time	Relinquished by: (Signature)	Received by: (Signature)	Date/Time
1 		11/22/2019 9:00am	2 		01/27/20 2019
3 			4		
			6		

Revised Date 05/14/18 Rev. 2018.



## Inter-Office Shipment

Page 1 of 1

IOS Number **56546**

Date/Time: 01/22/20 11:42

Created by: Elizabeth McClellan

Please send report to: Jessica Kramer

Lab# From: **Carlsbad**

Delivery Priority:

Address: 1089 N Canal Street

Lab# To: **Midland**

Air Bill No.: 777580852397

E-Mail: jessica.kramer@xenco.com

Sample Id	Matrix	Client Sample Id	Sample Collection	Method	Method Name	Lab Due	HT Due	PM	Analytes	Sign
649845-001	S	SP-11	01/21/20 13:03	SW8015MOD_NM	TPH by SW8015 Mod	01/28/20	02/04/20	JKR	GRO-DRO PHCC10C28 PI	
649845-001	S	SP-11	01/21/20 13:03	SW8021B	BTEX by EPA 8021B	01/28/20	02/04/20	JKR	BZ BZME EBZ XYLENES	
649845-001	S	SP-11	01/21/20 13:03	E300_CL	Chloride by EPA 300	01/28/20	02/18/20	JKR	CL	
649845-002	S	SP-11 A	01/21/20 13:05	SW8021B	BTEX by EPA 8021B	01/28/20	02/04/20	JKR	BZ BZME EBZ XYLENES	
649845-002	S	SP-11 A	01/21/20 13:05	SW8015MOD_NM	TPH by SW8015 Mod	01/28/20	02/04/20	JKR	GRO-DRO PHCC10C28 PI	
649845-002	S	SP-11 A	01/21/20 13:05	E300_CL	Chloride by EPA 300	01/28/20	02/18/20	JKR	CL	
649845-003	S	SP-11 B	01/21/20 13:24	SW8021B	BTEX by EPA 8021B	01/28/20	02/04/20	JKR	BZ BZME EBZ XYLENES	
649845-003	S	SP-11 B	01/21/20 13:24	SW8015MOD_NM	TPH by SW8015 Mod	01/28/20	02/04/20	JKR	GRO-DRO PHCC10C28 PI	
649845-003	S	SP-11 B	01/21/20 13:24	E300_CL	Chloride by EPA 300	01/28/20	02/18/20	JKR	CL	
649845-004	S	SP-11 C	01/21/20 13:26	SW8021B	BTEX by EPA 8021B	01/28/20	02/04/20	JKR	BZ BZME EBZ XYLENES	
649845-004	S	SP-11 C	01/21/20 13:26	E300_CL	Chloride by EPA 300	01/28/20	02/18/20	JKR	CL	
649845-004	S	SP-11 C	01/21/20 13:26	SW8015MOD_NM	TPH by SW8015 Mod	01/28/20	02/04/20	JKR	GRO-DRO PHCC10C28 PI	

## Inter Office Shipment or Sample Comments:

Relinquished By:

Elizabeth McClellan

Date Relinquished: 01/22/2020

Received By:

Brianna Teel

Date Received: 01/23/2020 11:19

Cooler Temperature: 0.3





## Inter Office Report- Sample Receipt Checklist

Sent To: Midland

IOS #: 56546

Acceptable Temperature Range: 0 - 6 degC

Air and Metal samples Acceptable Range: Ambient

Temperature Measuring device used : R8

Sent By: Elizabeth McClellan

Date Sent: 01/22/2020 11:42 AM

Received By: Brianna Teel

Date Received: 01/23/2020 11:19 AM

## Sample Receipt Checklist

## Comments

#1 *Temperature of cooler(s)?	.3
#2 *Shipping container in good condition?	Yes
#3 *Samples received with appropriate temperature?	Yes
#4 *Custody Seals intact on shipping container/ cooler?	Yes
#5 *Custody Seals Signed and dated for Containers/coolers	Yes
#6 *IOS present?	Yes
#7 Any missing/extra samples?	No
#8 IOS agrees with sample label(s)/matrix?	Yes
#9 Sample matrix/ properties agree with IOS?	Yes
#10 Samples in proper container/ bottle?	Yes
#11 Samples properly preserved?	Yes
#12 Sample container(s) intact?	Yes
#13 Sufficient sample amount for indicated test(s)?	Yes
#14 All samples received within hold time?	Yes

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

## NonConformance:

## Corrective Action Taken:

## Nonconformance Documentation

Contact: \_\_\_\_\_ Contacted by : \_\_\_\_\_ Date: \_\_\_\_\_

Checklist reviewed by:

Brianna Teel

Date: 01/23/2020

## XENCO Laboratories

## Prelogin/Nonconformance Report- Sample Log-In

Client: LT Environmental, Inc.

Date/ Time Received: 01.22.2020 09.45.00 AM

Work Order #: 649845

Acceptable Temperature Range: 0 - 6 degC

Air and Metal samples Acceptable Range: Ambient

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 container/ 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 relinquished/ received?	Yes
#10 Chain of Custody agrees with sample labels/matrix?	Yes
#11 Container label(s) legible and intact?	Yes
#12 Samples in proper container/ bottle?	Yes
#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)?	Yes Subbed to Midland.
#18 Water VOC samples have zero headspace?	N/A

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

Analyst:

PH Device/Lot#:

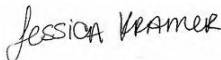
Checklist completed by:



Elizabeth McClellan

Date: 01.22.2020

Checklist reviewed by:



Jessica Kramer

Date: 01.22.2020

# **Analytical Report 649846**

**for  
LT Environmental, Inc.**

**Project Manager: Dan Moir**

**JRU 29**

**012918135**

**03-FEB-20**

Collected By: Client



**1089 N Canal Street  
Carlsbad, NM 88220**

Xenco-Houston (EPA Lab Code: TX00122):

Texas (T104704215-19-30), Arizona (AZ0765), Florida (E871002-24), Louisiana (03054)  
Oklahoma (2019-058), North Carolina (681), Arkansas (19-037-0)

Xenco-Dallas (EPA Lab Code: TX01468):

Texas (TX104704295-19-22), Arizona (AZ0809), Arkansas (17-063-0)

Xenco-El Paso (EPA Lab Code: TX00127): Texas (T104704221-19-16)

Xenco-Lubbock (EPA Lab Code: TX00139): Texas (T104704219-19-21)

Xenco-Midland (EPA Lab Code: TX00158): Texas (T104704400-19-19)

Xenco-Carlsbad (LELAP): Louisiana (05092)

Xenco-San Antonio (EPA Lab Code: TNI02385): Texas (T104704534-19-5)

Xenco Phoenix (EPA Lab Code: AZ00901): Arizona (AZ0757)

Xenco-Tampa: Florida (E87429), North Carolina (483)



03-FEB-20

Project Manager: **Dan Moir**

**LT Environmental, Inc.**

4600 W. 60th Avenue

Arvada, CO 80003

Reference: XENCO Report No(s): **649846**

**JRU 29**

Project Address:

**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 XENCO Report Number(s) 649846. 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 XENCO Laboratories. 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. 649846 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 XENCO Laboratories to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

A handwritten signature in black ink that reads 'Jessica Kramer'.

---

**Jessica Kramer**

Project Assistant

***Recipient of the Prestigious Small Business Administration Award of Excellence in 1994.***

*Certified and approved by numerous States and Agencies.*

*A Small Business and Minority Status Company that delivers SERVICE and QUALITY*

Houston - Dallas - Midland - San Antonio - Phoenix - Oklahoma - Latin America

**Sample Cross Reference 649846****LT Environmental, Inc., Arvada, CO**

JRU 29

<b>Sample Id</b>	<b>Matrix</b>	<b>Date Collected</b>	<b>Sample Depth</b>	<b>Lab Sample Id</b>
SP-12	S	01-21-20 10:42	4 ft	649846-001
SP-12 A	S	01-21-20 10:41	5 ft	649846-002
SP-12 B	S	01-21-20 10:44	6 ft	649846-003
SP-12 C	S	01-21-20 10:45	7 ft	649846-004
SP-12 D	S	01-21-20 10:46	8 ft	649846-005
SP-12 E	S	01-21-20 10:48	9 ft	649846-006
SP-12 F	S	01-21-20 10:49	10 ft	649846-007
SP-12 G	S	01-21-20 10:50	11 ft	649846-008
SP-12 H	S	01-21-20 10:51	12 ft	649846-009
SP-12 I	S	01-21-20 10:53	13 ft	649846-010
SP-12 J	S	01-21-20 10:54	14 ft	649846-011





## CASE NARRATIVE

**Client Name:** LT Environmental, Inc.

**Project Name:** JRU 29

Project ID: 012918135

Work Order Number(s): 649846

Report Date: 03-FEB-20

Date Received: 01/22/2020

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**Sample receipt non conformances and comments:**

None

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**Sample receipt non conformances and comments per sample:**

None

**Analytical non conformances and comments:**

Batch: LBA-3115184 BTEX by EPA 8021B

Soil samples were not received in Terracore kits and therefore were prepared by method 5030.



# Certificate of Analysis Summary 649846

LT Environmental, Inc., Arvada, CO

Project Name: JRU 29

Project Id: 012918135

Contact: Dan Moir

Project Location:

Date Received in Lab: Wed Jan-22-20 09:45 am

Report Date: 03-FEB-20

Project Manager: Jessica Kramer

<i>Analysis Requested</i>	<i>Lab Id:</i>	649846-001	649846-002	649846-003	649846-004	649846-005	649846-006
	<i>Field Id:</i>	SP-12	SP-12 A	SP-12 B	SP-12 C	SP-12 D	SP-12 E
	<i>Depth:</i>	4- ft	5- ft	6- ft	7- ft	8- ft	9- ft
	<i>Matrix:</i>	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL
	<i>Sampled:</i>	Jan-21-20 10:42	Jan-21-20 10:41	Jan-21-20 10:44	Jan-21-20 10:45	Jan-21-20 10:46	Jan-21-20 10:48
<b>BTEX by EPA 8021B SUB: T104704400-19-19</b>	<i>Extracted:</i>	Jan-31-20 10:30	Jan-31-20 10:30	Jan-31-20 10:30	Jan-31-20 10:30	Jan-31-20 10:30	Jan-31-20 10:30
	<i>Analyzed:</i>	Jan-31-20 18:33	Jan-31-20 19:52	Jan-31-20 20:12	Jan-31-20 20:32	Jan-31-20 20:52	Jan-31-20 21:12
	<i>Units/RL:</i>	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL
Benzene		<0.00200 0.00200	<0.00202 0.00202	<0.00201 0.00201	<0.00198 0.00198	<0.00200 0.00200	<0.00199 0.00199
Toluene		<0.00200 0.00200	<0.00202 0.00202	<0.00201 0.00201	<0.00198 0.00198	<0.00200 0.00200	<0.00199 0.00199
Ethylbenzene		<0.00200 0.00200	<0.00202 0.00202	<0.00201 0.00201	<0.00198 0.00198	<0.00200 0.00200	<0.00199 0.00199
m,p-Xylenes		<0.00401 0.00401	<0.00404 0.00404	<0.00402 0.00402	<0.00397 0.00397	<0.00399 0.00399	<0.00398 0.00398
o-Xylene		<0.00200 0.00200	<0.00202 0.00202	<0.00201 0.00201	<0.00198 0.00198	<0.00200 0.00200	<0.00199 0.00199
Total Xylenes		<0.00200 0.00200	<0.00202 0.00202	<0.00201 0.00201	<0.00198 0.00198	<0.00200 0.00200	<0.00199 0.00199
Total BTEX		<0.00200 0.00200	<0.00202 0.00202	<0.00201 0.00201	<0.00198 0.00198	<0.00200 0.00200	<0.00199 0.00199
<b>Chloride by EPA 300 SUB: T104704400-19-19</b>	<i>Extracted:</i>	Jan-23-20 17:45	Jan-23-20 17:45	Jan-23-20 17:45	Jan-23-20 17:45	Jan-23-20 17:45	Jan-23-20 17:45
	<i>Analyzed:</i>	Jan-24-20 00:45	Jan-24-20 00:51	Jan-24-20 01:17	Jan-24-20 01:23	Jan-24-20 01:43	Jan-24-20 01:49
	<i>Units/RL:</i>	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL
Chloride		1940 24.8	2010 25.0	1760 25.2	1580 25.0	1110 5.00	383 5.00
<b>TPH by SW8015 Mod SUB: T104704400-19-19</b>	<i>Extracted:</i>	Jan-25-20 12:00	Jan-25-20 12:00	Jan-25-20 12:00	Jan-25-20 12:00	Jan-25-20 12:00	Jan-25-20 12:00
	<i>Analyzed:</i>	Jan-25-20 22:03	Jan-25-20 23:05	Jan-25-20 23:26	Jan-25-20 23:47	Jan-26-20 00:08	Jan-26-20 00:30
	<i>Units/RL:</i>	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL
Gasoline Range Hydrocarbons (GRO)		<50.0 50.0	<49.8 49.8	<49.9 49.9	<50.0 50.0	<49.8 49.8	<50.0 50.0
Diesel Range Organics (DRO)		<50.0 50.0	<49.8 49.8	<49.9 49.9	<50.0 50.0	<49.8 49.8	<50.0 50.0
Motor Oil Range Hydrocarbons (MRO)		<50.0 50.0	<49.8 49.8	<49.9 49.9	<50.0 50.0	<49.8 49.8	<50.0 50.0
Total GRO-DRO		<50.0 50.0	<49.8 49.8	<49.9 49.9	<50.0 50.0	<49.8 49.8	<50.0 50.0
Total TPH		<50.0 50.0	<49.8 49.8	<49.9 49.9	<50.0 50.0	<49.8 49.8	<50.0 50.0

This analytical report, and the entire data package it represents, has been made for your exclusive and confidential use. The interpretations and results expressed throughout this analytical report represent the best judgment of XENCO Laboratories. XENCO Laboratories assumes no responsibility and makes no warranty to the end use of the data hereby presented. Our liability is limited to the amount invoiced for this work order unless otherwise agreed to in writing.

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

*Jessica Kramer*

Jessica Kramer  
Project Assistant



# Certificate of Analysis Summary 649846

LT Environmental, Inc., Arvada, CO

Project Name: JRU 29

Project Id: 012918135

Contact: Dan Moir

Project Location:

Date Received in Lab: Wed Jan-22-20 09:45 am

Report Date: 03-FEB-20

Project Manager: Jessica Kramer

<i>Analysis Requested</i>	<i>Lab Id:</i>	649846-007	649846-008	649846-009	649846-010	649846-011	
	<i>Field Id:</i>	SP-12 F	SP-12 G	SP-12 H	SP-12 I	SP-12 J	
	<i>Depth:</i>	10- ft	11- ft	12- ft	13- ft	14- ft	
	<i>Matrix:</i>	SOIL	SOIL	SOIL	SOIL	SOIL	
	<i>Sampled:</i>	Jan-21-20 10:49	Jan-21-20 10:50	Jan-21-20 10:51	Jan-21-20 10:53	Jan-21-20 10:54	
<b>BTEX by EPA 8021B SUB: T104704400-19-19</b>	<i>Extracted:</i>	Jan-31-20 10:30	Jan-31-20 10:30	Jan-31-20 10:30	Jan-31-20 10:30	Jan-31-20 10:30	
	<i>Analyzed:</i>	Jan-31-20 21:32	Jan-31-20 21:52	Jan-31-20 22:13	Jan-31-20 22:33	Jan-31-20 22:53	
	<i>Units/RL:</i>	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL	
Benzene		<0.00199 0.00199	<0.00199 0.00199	<0.00200 0.00200	<0.00200 0.00200	<0.00202 0.00202	
Toluene		<0.00199 0.00199	<0.00199 0.00199	<0.00200 0.00200	<0.00200 0.00200	<0.00202 0.00202	
Ethylbenzene		<0.00199 0.00199	<0.00199 0.00199	<0.00200 0.00200	<0.00200 0.00200	<0.00202 0.00202	
m,p-Xylenes		<0.00398 0.00398	<0.00398 0.00398	<0.00400 0.00400	<0.00399 0.00399	<0.00403 0.00403	
o-Xylene		<0.00199 0.00199	<0.00199 0.00199	<0.00200 0.00200	<0.00200 0.00200	<0.00202 0.00202	
Total Xylenes		<0.00199 0.00199	<0.00199 0.00199	<0.00200 0.00200	<0.00200 0.00200	<0.00202 0.00202	
Total BTEX		<0.00199 0.00199	<0.00199 0.00199	<0.00200 0.00200	<0.00200 0.00200	<0.00202 0.00202	
<b>Chloride by EPA 300 SUB: T104704400-19-19</b>	<i>Extracted:</i>	Jan-23-20 17:45	Jan-23-20 17:45	Jan-23-20 17:45	Jan-23-20 17:45	Jan-23-20 18:00	
	<i>Analyzed:</i>	Jan-24-20 01:56	Jan-24-20 02:02	Jan-24-20 02:09	Jan-24-20 02:15	Jan-24-20 08:37	
	<i>Units/RL:</i>	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL	
Chloride		537 5.00	418 5.02	698 4.96	947 4.98	561 5.05	
<b>TPH by SW8015 Mod SUB: T104704400-19-19</b>	<i>Extracted:</i>	Jan-25-20 12:00	Jan-25-20 12:00	Jan-25-20 12:00	Jan-25-20 12:00	Jan-25-20 12:00	
	<i>Analyzed:</i>	Jan-26-20 00:51	Jan-26-20 01:12	Jan-26-20 01:33	Jan-26-20 01:54	Jan-26-20 02:37	
	<i>Units/RL:</i>	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL	mg/kg RL	
Gasoline Range Hydrocarbons (GRO)		<49.9 49.9	<49.9 49.9	<50.0 50.0	<50.0 50.0	<49.9 49.9	
Diesel Range Organics (DRO)		<49.9 49.9	<49.9 49.9	<50.0 50.0	<50.0 50.0	<49.9 49.9	
Motor Oil Range Hydrocarbons (MRO)		<49.9 49.9	<49.9 49.9	<50.0 50.0	<50.0 50.0	<49.9 49.9	
Total GRO-DRO		<49.9 49.9	<49.9 49.9	<50.0 50.0	<50.0 50.0	<49.9 49.9	
Total TPH		<49.9 49.9	<49.9 49.9	<50.0 50.0	<50.0 50.0	<49.9 49.9	

This analytical report, and the entire data package it represents, has been made for your exclusive and confidential use. The interpretations and results expressed throughout this analytical report represent the best judgment of XENCO Laboratories. XENCO Laboratories assumes no responsibility and makes no warranty to the end use of the data hereby presented. Our liability is limited to the amount invoiced for this work order unless otherwise agreed to in writing.

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

*Jessica Kramer*

Jessica Kramer  
Project Assistant



# Certificate of Analytical Results 649846

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-12**  
 Lab Sample Id: 649846-001

Matrix: Soil  
 Date Collected: 01.21.20 10.42

Date Received: 01.22.20 09.45  
 Sample Depth: 4 ft

Analytical Method: Chloride by EPA 300

Tech: CHE

Analyst: CHE

Seq Number: 3114316

Date Prep: 01.23.20 17.45

Prep Method: E300P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	1940	24.8	mg/kg	01.24.20 00.45		5

Analytical Method: TPH by SW8015 Mod

Tech: DVM

Analyst: ARM

Seq Number: 3114508

Date Prep: 01.25.20 12.00

Prep Method: SW8015P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Gasoline Range Hydrocarbons (GRO)	PHC610	<50.0	50.0	mg/kg	01.25.20 22.03	U	1
Diesel Range Organics (DRO)	C10C28DRO	<50.0	50.0	mg/kg	01.25.20 22.03	U	1
Motor Oil Range Hydrocarbons (MRO)	PHCG2835	<50.0	50.0	mg/kg	01.25.20 22.03	U	1
Total GRO-DRO	PHC628	<50.0	50.0	mg/kg	01.25.20 22.03	U	1
Total TPH	PHC635	<50.0	50.0	mg/kg	01.25.20 22.03	U	1

Surrogate	Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
1-Chlorooctane	111-85-3	119	%	70-135	01.25.20 22.03	
o-Terphenyl	84-15-1	124	%	70-135	01.25.20 22.03	



# Certificate of Analytical Results 649846

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-12**  
Lab Sample Id: 649846-001

Matrix: Soil  
Date Collected: 01.21.20 10.42

Date Received: 01.22.20 09.45  
Sample Depth: 4 ft

Analytical Method: BTEX by EPA 8021B

Tech: KTL

Analyst: KTL

Seq Number: 3115184

Prep Method: SW5030B

% Moisture:

Date Prep: 01.31.20 10.30

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Benzene	71-43-2	<0.00200	0.00200	mg/kg	01.31.20 18.33	U	1
Toluene	108-88-3	<0.00200	0.00200	mg/kg	01.31.20 18.33	U	1
Ethylbenzene	100-41-4	<0.00200	0.00200	mg/kg	01.31.20 18.33	U	1
m,p-Xylenes	179601-23-1	<0.00401	0.00401	mg/kg	01.31.20 18.33	U	1
o-Xylene	95-47-6	<0.00200	0.00200	mg/kg	01.31.20 18.33	U	1
Total Xylenes	1330-20-7	<0.00200	0.00200	mg/kg	01.31.20 18.33	U	1
Total BTEX		<0.00200	0.00200	mg/kg	01.31.20 18.33	U	1
<b>Surrogate</b>	<b>Cas Number</b>	<b>% Recovery</b>	<b>Units</b>	<b>Limits</b>	<b>Analysis Date</b>	<b>Flag</b>	
1,4-Difluorobenzene	540-36-3	118	%	70-130	01.31.20 18.33		
4-Bromofluorobenzene	460-00-4	77	%	70-130	01.31.20 18.33		





# Certificate of Analytical Results 649846

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-12 A**  
 Lab Sample Id: 649846-002

Matrix: Soil  
 Date Collected: 01.21.20 10.41

Date Received: 01.22.20 09.45  
 Sample Depth: 5 ft

Analytical Method: Chloride by EPA 300

Tech: CHE

Analyst: CHE

Seq Number: 3114316

Date Prep: 01.23.20 17.45

Prep Method: E300P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	2010	25.0	mg/kg	01.24.20 00.51		5

Analytical Method: TPH by SW8015 Mod

Tech: DVM

Analyst: ARM

Seq Number: 3114508

Date Prep: 01.25.20 12.00

Prep Method: SW8015P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Gasoline Range Hydrocarbons (GRO)	PHC610	<49.8	49.8	mg/kg	01.25.20 23.05	U	1
Diesel Range Organics (DRO)	C10C28DRO	<49.8	49.8	mg/kg	01.25.20 23.05	U	1
Motor Oil Range Hydrocarbons (MRO)	PHCG2835	<49.8	49.8	mg/kg	01.25.20 23.05	U	1
Total GRO-DRO	PHC628	<49.8	49.8	mg/kg	01.25.20 23.05	U	1
Total TPH	PHC635	<49.8	49.8	mg/kg	01.25.20 23.05	U	1

Surrogate	Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
1-Chlorooctane	111-85-3	115	%	70-135	01.25.20 23.05	
o-Terphenyl	84-15-1	114	%	70-135	01.25.20 23.05	



# Certificate of Analytical Results 649846

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-12 A**  
Lab Sample Id: 649846-002

Matrix: Soil  
Date Collected: 01.21.20 10.41

Date Received: 01.22.20 09.45  
Sample Depth: 5 ft

Analytical Method: BTEX by EPA 8021B

Tech: KTL

Analyst: KTL

Seq Number: 3115184

Date Prep: 01.31.20 10.30

Prep Method: SW5030B

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Benzene	71-43-2	<0.00202	0.00202	mg/kg	01.31.20 19.52	U	1
Toluene	108-88-3	<0.00202	0.00202	mg/kg	01.31.20 19.52	U	1
Ethylbenzene	100-41-4	<0.00202	0.00202	mg/kg	01.31.20 19.52	U	1
m,p-Xylenes	179601-23-1	<0.00404	0.00404	mg/kg	01.31.20 19.52	U	1
o-Xylene	95-47-6	<0.00202	0.00202	mg/kg	01.31.20 19.52	U	1
Total Xylenes	1330-20-7	<0.00202	0.00202	mg/kg	01.31.20 19.52	U	1
Total BTEX		<0.00202	0.00202	mg/kg	01.31.20 19.52	U	1
<b>Surrogate</b>	<b>Cas Number</b>	<b>% Recovery</b>	<b>Units</b>	<b>Limits</b>	<b>Analysis Date</b>	<b>Flag</b>	
1,4-Difluorobenzene	540-36-3	114	%	70-130	01.31.20 19.52		
4-Bromofluorobenzene	460-00-4	73	%	70-130	01.31.20 19.52		



# Certificate of Analytical Results 649846

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-12 B**  
Lab Sample Id: 649846-003

Matrix: Soil  
Date Collected: 01.21.20 10.44

Date Received: 01.22.20 09.45  
Sample Depth: 6 ft

Analytical Method: Chloride by EPA 300

Tech: CHE

Analyst: CHE

Seq Number: 3114316

Date Prep: 01.23.20 17.45

Prep Method: E300P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	1760	25.2	mg/kg	01.24.20 01.17		5

Analytical Method: TPH by SW8015 Mod

Tech: DVM

Analyst: ARM

Seq Number: 3114508

Date Prep: 01.25.20 12.00

Prep Method: SW8015P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Gasoline Range Hydrocarbons (GRO)	PHC610	<49.9	49.9	mg/kg	01.25.20 23.26	U	1
Diesel Range Organics (DRO)	C10C28DRO	<49.9	49.9	mg/kg	01.25.20 23.26	U	1
Motor Oil Range Hydrocarbons (MRO)	PHCG2835	<49.9	49.9	mg/kg	01.25.20 23.26	U	1
Total GRO-DRO	PHC628	<49.9	49.9	mg/kg	01.25.20 23.26	U	1
Total TPH	PHC635	<49.9	49.9	mg/kg	01.25.20 23.26	U	1

Surrogate	Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
1-Chlorooctane	111-85-3	116	%	70-135	01.25.20 23.26	
o-Terphenyl	84-15-1	113	%	70-135	01.25.20 23.26	



# Certificate of Analytical Results 649846

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-12 B**  
Lab Sample Id: 649846-003

Matrix: Soil  
Date Collected: 01.21.20 10.44

Date Received: 01.22.20 09.45  
Sample Depth: 6 ft

Analytical Method: BTEX by EPA 8021B

Tech: KTL

Analyst: KTL

Seq Number: 3115184

Date Prep: 01.31.20 10.30

Prep Method: SW5030B

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Benzene	71-43-2	<0.00201	0.00201	mg/kg	01.31.20 20.12	U	1
Toluene	108-88-3	<0.00201	0.00201	mg/kg	01.31.20 20.12	U	1
Ethylbenzene	100-41-4	<0.00201	0.00201	mg/kg	01.31.20 20.12	U	1
m,p-Xylenes	179601-23-1	<0.00402	0.00402	mg/kg	01.31.20 20.12	U	1
o-Xylene	95-47-6	<0.00201	0.00201	mg/kg	01.31.20 20.12	U	1
Total Xylenes	1330-20-7	<0.00201	0.00201	mg/kg	01.31.20 20.12	U	1
Total BTEX		<0.00201	0.00201	mg/kg	01.31.20 20.12	U	1
<b>Surrogate</b>	<b>Cas Number</b>	<b>% Recovery</b>	<b>Units</b>	<b>Limits</b>	<b>Analysis Date</b>	<b>Flag</b>	
4-Bromofluorobenzene	460-00-4	75	%	70-130	01.31.20 20.12		
1,4-Difluorobenzene	540-36-3	115	%	70-130	01.31.20 20.12		



# Certificate of Analytical Results 649846

## LT Environmental, Inc., Arvada, CO

JRJ 29

Sample Id: **SP-12 C**  
 Lab Sample Id: 649846-004

Matrix: Soil  
 Date Collected: 01.21.20 10.45

Date Received: 01.22.20 09.45  
 Sample Depth: 7 ft

Analytical Method: Chloride by EPA 300

Tech: CHE

Analyst: CHE

Seq Number: 3114316

Date Prep: 01.23.20 17.45

Prep Method: E300P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	1580	25.0	mg/kg	01.24.20 01.23		5

Analytical Method: TPH by SW8015 Mod

Tech: DVM

Analyst: ARM

Seq Number: 3114508

Date Prep: 01.25.20 12.00

Prep Method: SW8015P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Gasoline Range Hydrocarbons (GRO)	PHC610	<50.0	50.0	mg/kg	01.25.20 23.47	U	1
Diesel Range Organics (DRO)	C10C28DRO	<50.0	50.0	mg/kg	01.25.20 23.47	U	1
Motor Oil Range Hydrocarbons (MRO)	PHCG2835	<50.0	50.0	mg/kg	01.25.20 23.47	U	1
Total GRO-DRO	PHC628	<50.0	50.0	mg/kg	01.25.20 23.47	U	1
Total TPH	PHC635	<50.0	50.0	mg/kg	01.25.20 23.47	U	1

Surrogate	Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
1-Chlorooctane	111-85-3	119	%	70-135	01.25.20 23.47	
o-Terphenyl	84-15-1	116	%	70-135	01.25.20 23.47	





# Certificate of Analytical Results 649846

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-12 C**  
Lab Sample Id: 649846-004

Matrix: Soil  
Date Collected: 01.21.20 10.45

Date Received: 01.22.20 09.45  
Sample Depth: 7 ft

Analytical Method: BTEX by EPA 8021B

Tech: KTL

Analyst: KTL

Seq Number: 3115184

Date Prep: 01.31.20 10.30

Prep Method: SW5030B

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Benzene	71-43-2	<0.00198	0.00198	mg/kg	01.31.20 20.32	U	1
Toluene	108-88-3	<0.00198	0.00198	mg/kg	01.31.20 20.32	U	1
Ethylbenzene	100-41-4	<0.00198	0.00198	mg/kg	01.31.20 20.32	U	1
m,p-Xylenes	179601-23-1	<0.00397	0.00397	mg/kg	01.31.20 20.32	U	1
o-Xylene	95-47-6	<0.00198	0.00198	mg/kg	01.31.20 20.32	U	1
Total Xylenes	1330-20-7	<0.00198	0.00198	mg/kg	01.31.20 20.32	U	1
Total BTEX		<0.00198	0.00198	mg/kg	01.31.20 20.32	U	1
<b>Surrogate</b>	<b>Cas Number</b>	<b>% Recovery</b>	<b>Units</b>	<b>Limits</b>	<b>Analysis Date</b>	<b>Flag</b>	
1,4-Difluorobenzene	540-36-3	113	%	70-130	01.31.20 20.32		
4-Bromofluorobenzene	460-00-4	73	%	70-130	01.31.20 20.32		



# Certificate of Analytical Results 649846

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-12 D**  
 Lab Sample Id: 649846-005

Matrix: Soil  
 Date Collected: 01.21.20 10.46

Date Received: 01.22.20 09.45  
 Sample Depth: 8 ft

Analytical Method: Chloride by EPA 300

Tech: CHE

Analyst: CHE

Seq Number: 3114316

Date Prep: 01.23.20 17.45

Prep Method: E300P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	1110	5.00	mg/kg	01.24.20 01.43		1

Analytical Method: TPH by SW8015 Mod

Tech: DVM

Analyst: ARM

Seq Number: 3114508

Date Prep: 01.25.20 12.00

Prep Method: SW8015P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Gasoline Range Hydrocarbons (GRO)	PHC610	<49.8	49.8	mg/kg	01.26.20 00.08	U	1
Diesel Range Organics (DRO)	C10C28DRO	<49.8	49.8	mg/kg	01.26.20 00.08	U	1
Motor Oil Range Hydrocarbons (MRO)	PHCG2835	<49.8	49.8	mg/kg	01.26.20 00.08	U	1
Total GRO-DRO	PHC628	<49.8	49.8	mg/kg	01.26.20 00.08	U	1
Total TPH	PHC635	<49.8	49.8	mg/kg	01.26.20 00.08	U	1

Surrogate	Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
1-Chlorooctane	111-85-3	121	%	70-135	01.26.20 00.08	
o-Terphenyl	84-15-1	116	%	70-135	01.26.20 00.08	



# Certificate of Analytical Results 649846

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-12 D**  
Lab Sample Id: 649846-005

Matrix: Soil  
Date Collected: 01.21.20 10.46

Date Received: 01.22.20 09.45  
Sample Depth: 8 ft

Analytical Method: BTEX by EPA 8021B

Tech: KTL

Analyst: KTL

Seq Number: 3115184

Date Prep: 01.31.20 10.30

Prep Method: SW5030B

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Benzene	71-43-2	<0.00200	0.00200	mg/kg	01.31.20 20.52	U	1
Toluene	108-88-3	<0.00200	0.00200	mg/kg	01.31.20 20.52	U	1
Ethylbenzene	100-41-4	<0.00200	0.00200	mg/kg	01.31.20 20.52	U	1
m,p-Xylenes	179601-23-1	<0.00399	0.00399	mg/kg	01.31.20 20.52	U	1
o-Xylene	95-47-6	<0.00200	0.00200	mg/kg	01.31.20 20.52	U	1
Total Xylenes	1330-20-7	<0.00200	0.00200	mg/kg	01.31.20 20.52	U	1
Total BTEX		<0.00200	0.00200	mg/kg	01.31.20 20.52	U	1
<b>Surrogate</b>	<b>Cas Number</b>	<b>% Recovery</b>	<b>Units</b>	<b>Limits</b>	<b>Analysis Date</b>	<b>Flag</b>	
4-Bromofluorobenzene	460-00-4	74	%	70-130	01.31.20 20.52		
1,4-Difluorobenzene	540-36-3	115	%	70-130	01.31.20 20.52		



# Certificate of Analytical Results 649846

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-12 E**  
 Lab Sample Id: 649846-006

Matrix: Soil  
 Date Collected: 01.21.20 10.48

Date Received: 01.22.20 09.45  
 Sample Depth: 9 ft

Analytical Method: Chloride by EPA 300

Tech: CHE

Analyst: CHE

Seq Number: 3114316

Date Prep: 01.23.20 17.45

Prep Method: E300P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	383	5.00	mg/kg	01.24.20 01.49		1

Analytical Method: TPH by SW8015 Mod

Tech: DVM

Analyst: ARM

Seq Number: 3114508

Date Prep: 01.25.20 12.00

Prep Method: SW8015P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Gasoline Range Hydrocarbons (GRO)	PHC610	<50.0	50.0	mg/kg	01.26.20 00.30	U	1
Diesel Range Organics (DRO)	C10C28DRO	<50.0	50.0	mg/kg	01.26.20 00.30	U	1
Motor Oil Range Hydrocarbons (MRO)	PHCG2835	<50.0	50.0	mg/kg	01.26.20 00.30	U	1
Total GRO-DRO	PHC628	<50.0	50.0	mg/kg	01.26.20 00.30	U	1
Total TPH	PHC635	<50.0	50.0	mg/kg	01.26.20 00.30	U	1

**Surrogate**

1-Chlorooctane

o-Terphenyl

Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
111-85-3	119	%	70-135	01.26.20 00.30	
84-15-1	114	%	70-135	01.26.20 00.30	



# Certificate of Analytical Results 649846

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-12 E**  
Lab Sample Id: 649846-006

Matrix: Soil  
Date Collected: 01.21.20 10.48

Date Received: 01.22.20 09.45  
Sample Depth: 9 ft

Analytical Method: BTEX by EPA 8021B

Tech: KTL

Analyst: KTL

Seq Number: 3115184

Prep Method: SW5030B

% Moisture:

Date Prep: 01.31.20 10.30

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Benzene	71-43-2	<0.00199	0.00199	mg/kg	01.31.20 21.12	U	1
Toluene	108-88-3	<0.00199	0.00199	mg/kg	01.31.20 21.12	U	1
Ethylbenzene	100-41-4	<0.00199	0.00199	mg/kg	01.31.20 21.12	U	1
m,p-Xylenes	179601-23-1	<0.00398	0.00398	mg/kg	01.31.20 21.12	U	1
o-Xylene	95-47-6	<0.00199	0.00199	mg/kg	01.31.20 21.12	U	1
Total Xylenes	1330-20-7	<0.00199	0.00199	mg/kg	01.31.20 21.12	U	1
Total BTEX		<0.00199	0.00199	mg/kg	01.31.20 21.12	U	1
<b>Surrogate</b>	<b>Cas Number</b>	<b>% Recovery</b>	<b>Units</b>	<b>Limits</b>	<b>Analysis Date</b>	<b>Flag</b>	
4-Bromofluorobenzene	460-00-4	84	%	70-130	01.31.20 21.12		
1,4-Difluorobenzene	540-36-3	117	%	70-130	01.31.20 21.12		



# Certificate of Analytical Results 649846

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-12 F**  
 Lab Sample Id: 649846-007

Matrix: Soil  
 Date Collected: 01.21.20 10.49

Date Received: 01.22.20 09.45  
 Sample Depth: 10 ft

Analytical Method: Chloride by EPA 300

Tech: CHE

Analyst: CHE

Seq Number: 3114316

Date Prep: 01.23.20 17.45

Prep Method: E300P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	537	5.00	mg/kg	01.24.20 01.56		1

Analytical Method: TPH by SW8015 Mod

Tech: DVM

Analyst: ARM

Seq Number: 3114508

Date Prep: 01.25.20 12.00

Prep Method: SW8015P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Gasoline Range Hydrocarbons (GRO)	PHC610	<49.9	49.9	mg/kg	01.26.20 00.51	U	1
Diesel Range Organics (DRO)	C10C28DRO	<49.9	49.9	mg/kg	01.26.20 00.51	U	1
Motor Oil Range Hydrocarbons (MRO)	PHCG2835	<49.9	49.9	mg/kg	01.26.20 00.51	U	1
Total GRO-DRO	PHC628	<49.9	49.9	mg/kg	01.26.20 00.51	U	1
Total TPH	PHC635	<49.9	49.9	mg/kg	01.26.20 00.51	U	1

Surrogate	Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
1-Chlorooctane	111-85-3	118	%	70-135	01.26.20 00.51	
o-Terphenyl	84-15-1	114	%	70-135	01.26.20 00.51	





# Certificate of Analytical Results 649846

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-12 F**  
Lab Sample Id: 649846-007

Matrix: Soil  
Date Collected: 01.21.20 10.49

Date Received: 01.22.20 09.45  
Sample Depth: 10 ft

Analytical Method: BTEX by EPA 8021B

Tech: KTL

Analyst: KTL

Seq Number: 3115184

Date Prep: 01.31.20 10.30

Prep Method: SW5030B

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Benzene	71-43-2	<0.00199	0.00199	mg/kg	01.31.20 21.32	U	1
Toluene	108-88-3	<0.00199	0.00199	mg/kg	01.31.20 21.32	U	1
Ethylbenzene	100-41-4	<0.00199	0.00199	mg/kg	01.31.20 21.32	U	1
m,p-Xylenes	179601-23-1	<0.00398	0.00398	mg/kg	01.31.20 21.32	U	1
o-Xylene	95-47-6	<0.00199	0.00199	mg/kg	01.31.20 21.32	U	1
Total Xylenes	1330-20-7	<0.00199	0.00199	mg/kg	01.31.20 21.32	U	1
Total BTEX		<0.00199	0.00199	mg/kg	01.31.20 21.32	U	1
<b>Surrogate</b>	<b>Cas Number</b>	<b>% Recovery</b>	<b>Units</b>	<b>Limits</b>	<b>Analysis Date</b>	<b>Flag</b>	
4-Bromofluorobenzene	460-00-4	79	%	70-130	01.31.20 21.32		
1,4-Difluorobenzene	540-36-3	113	%	70-130	01.31.20 21.32		



# Certificate of Analytical Results 649846

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-12 G**  
Lab Sample Id: 649846-008

Matrix: Soil  
Date Collected: 01.21.20 10.50

Date Received: 01.22.20 09.45  
Sample Depth: 11 ft

Analytical Method: Chloride by EPA 300

Tech: CHE

Analyst: CHE

Seq Number: 3114316

Date Prep: 01.23.20 17.45

Prep Method: E300P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	<b>418</b>	5.02	mg/kg	01.24.20 02.02		1

Analytical Method: TPH by SW8015 Mod

Tech: DVM

Analyst: ARM

Seq Number: 3114508

Date Prep: 01.25.20 12.00

Prep Method: SW8015P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Gasoline Range Hydrocarbons (GRO)	PHC610	<49.9	49.9	mg/kg	01.26.20 01.12	U	1
Diesel Range Organics (DRO)	C10C28DRO	<49.9	49.9	mg/kg	01.26.20 01.12	U	1
Motor Oil Range Hydrocarbons (MRO)	PHCG2835	<49.9	49.9	mg/kg	01.26.20 01.12	U	1
Total GRO-DRO	PHC628	<49.9	49.9	mg/kg	01.26.20 01.12	U	1
Total TPH	PHC635	<49.9	49.9	mg/kg	01.26.20 01.12	U	1

Surrogate	Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
1-Chlorooctane	111-85-3	114	%	70-135	01.26.20 01.12	
o-Terphenyl	84-15-1	110	%	70-135	01.26.20 01.12	



# Certificate of Analytical Results 649846

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-12 G**  
Lab Sample Id: 649846-008

Matrix: Soil  
Date Collected: 01.21.20 10.50

Date Received: 01.22.20 09.45  
Sample Depth: 11 ft

Analytical Method: BTEX by EPA 8021B

Tech: KTL

Analyst: KTL

Seq Number: 3115184

Date Prep: 01.31.20 10.30

Prep Method: SW5030B

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Benzene	71-43-2	<0.00199	0.00199	mg/kg	01.31.20 21.52	U	1
Toluene	108-88-3	<0.00199	0.00199	mg/kg	01.31.20 21.52	U	1
Ethylbenzene	100-41-4	<0.00199	0.00199	mg/kg	01.31.20 21.52	U	1
m,p-Xylenes	179601-23-1	<0.00398	0.00398	mg/kg	01.31.20 21.52	U	1
o-Xylene	95-47-6	<0.00199	0.00199	mg/kg	01.31.20 21.52	U	1
Total Xylenes	1330-20-7	<0.00199	0.00199	mg/kg	01.31.20 21.52	U	1
Total BTEX		<0.00199	0.00199	mg/kg	01.31.20 21.52	U	1
<b>Surrogate</b>	<b>Cas Number</b>	<b>% Recovery</b>	<b>Units</b>	<b>Limits</b>	<b>Analysis Date</b>	<b>Flag</b>	
1,4-Difluorobenzene	540-36-3	117	%	70-130	01.31.20 21.52		
4-Bromofluorobenzene	460-00-4	77	%	70-130	01.31.20 21.52		



# Certificate of Analytical Results 649846

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-12 H**  
 Lab Sample Id: 649846-009

Matrix: Soil  
 Date Collected: 01.21.20 10.51

Date Received: 01.22.20 09.45  
 Sample Depth: 12 ft

Analytical Method: Chloride by EPA 300

Tech: CHE

Analyst: CHE

Seq Number: 3114316

Date Prep: 01.23.20 17.45

Prep Method: E300P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	<b>698</b>	4.96	mg/kg	01.24.20 02.09		1

Analytical Method: TPH by SW8015 Mod

Tech: DVM

Analyst: ARM

Seq Number: 3114508

Date Prep: 01.25.20 12.00

Prep Method: SW8015P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Gasoline Range Hydrocarbons (GRO)	PHC610	<50.0	50.0	mg/kg	01.26.20 01.33	U	1
Diesel Range Organics (DRO)	C10C28DRO	<50.0	50.0	mg/kg	01.26.20 01.33	U	1
Motor Oil Range Hydrocarbons (MRO)	PHCG2835	<50.0	50.0	mg/kg	01.26.20 01.33	U	1
Total GRO-DRO	PHC628	<50.0	50.0	mg/kg	01.26.20 01.33	U	1
Total TPH	PHC635	<50.0	50.0	mg/kg	01.26.20 01.33	U	1

Surrogate	Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
1-Chlorooctane	111-85-3	118	%	70-135	01.26.20 01.33	
o-Terphenyl	84-15-1	116	%	70-135	01.26.20 01.33	



# Certificate of Analytical Results 649846

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-12 H**  
Lab Sample Id: 649846-009

Matrix: Soil  
Date Collected: 01.21.20 10.51

Date Received: 01.22.20 09.45  
Sample Depth: 12 ft

Analytical Method: BTEX by EPA 8021B

Tech: KTL

Analyst: KTL

Seq Number: 3115184

Date Prep: 01.31.20 10.30

Prep Method: SW5030B

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Benzene	71-43-2	<0.00200	0.00200	mg/kg	01.31.20 22.13	U	1
Toluene	108-88-3	<0.00200	0.00200	mg/kg	01.31.20 22.13	U	1
Ethylbenzene	100-41-4	<0.00200	0.00200	mg/kg	01.31.20 22.13	U	1
m,p-Xylenes	179601-23-1	<0.00400	0.00400	mg/kg	01.31.20 22.13	U	1
o-Xylene	95-47-6	<0.00200	0.00200	mg/kg	01.31.20 22.13	U	1
Total Xylenes	1330-20-7	<0.00200	0.00200	mg/kg	01.31.20 22.13	U	1
Total BTEX		<0.00200	0.00200	mg/kg	01.31.20 22.13	U	1
<b>Surrogate</b>	<b>Cas Number</b>	<b>% Recovery</b>	<b>Units</b>	<b>Limits</b>	<b>Analysis Date</b>	<b>Flag</b>	
4-Bromofluorobenzene	460-00-4	72	%	70-130	01.31.20 22.13		
1,4-Difluorobenzene	540-36-3	113	%	70-130	01.31.20 22.13		



# Certificate of Analytical Results 649846

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-12 I**  
Lab Sample Id: 649846-010

Matrix: Soil  
Date Collected: 01.21.20 10.53

Date Received: 01.22.20 09.45  
Sample Depth: 13 ft

Analytical Method: Chloride by EPA 300

Tech: CHE

Analyst: CHE

Seq Number: 3114316

Date Prep: 01.23.20 17.45

Prep Method: E300P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	947	4.98	mg/kg	01.24.20 02.15		1

Analytical Method: TPH by SW8015 Mod

Tech: DVM

Analyst: ARM

Seq Number: 3114508

Date Prep: 01.25.20 12.00

Prep Method: SW8015P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Gasoline Range Hydrocarbons (GRO)	PHC610	<50.0	50.0	mg/kg	01.26.20 01.54	U	1
Diesel Range Organics (DRO)	C10C28DRO	<50.0	50.0	mg/kg	01.26.20 01.54	U	1
Motor Oil Range Hydrocarbons (MRO)	PHCG2835	<50.0	50.0	mg/kg	01.26.20 01.54	U	1
Total GRO-DRO	PHC628	<50.0	50.0	mg/kg	01.26.20 01.54	U	1
Total TPH	PHC635	<50.0	50.0	mg/kg	01.26.20 01.54	U	1

Surrogate	Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
1-Chlorooctane	111-85-3	118	%	70-135	01.26.20 01.54	
o-Terphenyl	84-15-1	115	%	70-135	01.26.20 01.54	





# Certificate of Analytical Results 649846

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-12 I**  
Lab Sample Id: 649846-010

Matrix: Soil  
Date Collected: 01.21.20 10.53

Date Received: 01.22.20 09.45  
Sample Depth: 13 ft

Analytical Method: BTEX by EPA 8021B

Tech: KTL

Analyst: KTL

Seq Number: 3115184

Date Prep: 01.31.20 10.30

Prep Method: SW5030B

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Benzene	71-43-2	<0.00200	0.00200	mg/kg	01.31.20 22.33	U	1
Toluene	108-88-3	<0.00200	0.00200	mg/kg	01.31.20 22.33	U	1
Ethylbenzene	100-41-4	<0.00200	0.00200	mg/kg	01.31.20 22.33	U	1
m,p-Xylenes	179601-23-1	<0.00399	0.00399	mg/kg	01.31.20 22.33	U	1
o-Xylene	95-47-6	<0.00200	0.00200	mg/kg	01.31.20 22.33	U	1
Total Xylenes	1330-20-7	<0.00200	0.00200	mg/kg	01.31.20 22.33	U	1
Total BTEX		<0.00200	0.00200	mg/kg	01.31.20 22.33	U	1
<b>Surrogate</b>	<b>Cas Number</b>	<b>% Recovery</b>	<b>Units</b>	<b>Limits</b>	<b>Analysis Date</b>	<b>Flag</b>	
4-Bromofluorobenzene	460-00-4	71	%	70-130	01.31.20 22.33		
1,4-Difluorobenzene	540-36-3	112	%	70-130	01.31.20 22.33		



# Certificate of Analytical Results 649846

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-12 J**  
 Lab Sample Id: 649846-011

Matrix: Soil  
 Date Collected: 01.21.20 10.54

Date Received: 01.22.20 09.45  
 Sample Depth: 14 ft

Analytical Method: Chloride by EPA 300

Tech: CHE

Analyst: CHE

Seq Number: 3114317

Date Prep: 01.23.20 18.00

Prep Method: E300P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	561	5.05	mg/kg	01.24.20 08.37		1

Analytical Method: TPH by SW8015 Mod

Tech: DVM

Analyst: ARM

Seq Number: 3114508

Date Prep: 01.25.20 12.00

Prep Method: SW8015P

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Gasoline Range Hydrocarbons (GRO)	PHC610	<49.9	49.9	mg/kg	01.26.20 02.37	U	1
Diesel Range Organics (DRO)	C10C28DRO	<49.9	49.9	mg/kg	01.26.20 02.37	U	1
Motor Oil Range Hydrocarbons (MRO)	PHCG2835	<49.9	49.9	mg/kg	01.26.20 02.37	U	1
Total GRO-DRO	PHC628	<49.9	49.9	mg/kg	01.26.20 02.37	U	1
Total TPH	PHC635	<49.9	49.9	mg/kg	01.26.20 02.37	U	1

Surrogate	Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
1-Chlorooctane	111-85-3	113	%	70-135	01.26.20 02.37	
o-Terphenyl	84-15-1	109	%	70-135	01.26.20 02.37	



# Certificate of Analytical Results 649846

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **SP-12 J**  
Lab Sample Id: 649846-011

Matrix: Soil  
Date Collected: 01.21.20 10.54

Date Received: 01.22.20 09.45  
Sample Depth: 14 ft

Analytical Method: BTEX by EPA 8021B

Tech: KTL

Analyst: KTL

Seq Number: 3115184

Date Prep: 01.31.20 10.30

Prep Method: SW5030B

% Moisture:

Basis: Wet Weight

SUB: T104704400-19-19

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Benzene	71-43-2	<0.00202	0.00202	mg/kg	01.31.20 22.53	U	1
Toluene	108-88-3	<0.00202	0.00202	mg/kg	01.31.20 22.53	U	1
Ethylbenzene	100-41-4	<0.00202	0.00202	mg/kg	01.31.20 22.53	U	1
m,p-Xylenes	179601-23-1	<0.00403	0.00403	mg/kg	01.31.20 22.53	U	1
o-Xylene	95-47-6	<0.00202	0.00202	mg/kg	01.31.20 22.53	U	1
Total Xylenes	1330-20-7	<0.00202	0.00202	mg/kg	01.31.20 22.53	U	1
Total BTEX		<0.00202	0.00202	mg/kg	01.31.20 22.53	U	1
<b>Surrogate</b>	<b>Cas Number</b>	<b>% Recovery</b>	<b>Units</b>	<b>Limits</b>	<b>Analysis Date</b>	<b>Flag</b>	
4-Bromofluorobenzene	460-00-4	78	%	70-130	01.31.20 22.53		
1,4-Difluorobenzene	540-36-3	113	%	70-130	01.31.20 22.53		



## 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.

\*\* Surrogate recovered outside laboratory control limit.

**BRL** Below Reporting Limit.

**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



## LT Environmental, Inc.

JRU 29

## Analytical Method: Chloride by EPA 300

Seq Number: 3114316

MB Sample Id: 7695087-1-BLK

Matrix: Solid

LCS Sample Id: 7695087-1-BKS

Prep Method: E300P

Date Prep: 01.23.20

LCSD Sample Id: 7695087-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	<0.858	250	256	102	257	103	90-110	0	20	mg/kg	01.23.20 23:14	

## Analytical Method: Chloride by EPA 300

Seq Number: 3114317

MB Sample Id: 7695088-1-BLK

Matrix: Solid

LCS Sample Id: 7695088-1-BKS

Prep Method: E300P

Date Prep: 01.23.20

LCSD Sample Id: 7695088-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	<0.858	250	252	101	252	101	90-110	0	20	mg/kg	01.24.20 05:36	

## Analytical Method: Chloride by EPA 300

Seq Number: 3114316

Parent Sample Id: 649845-001

Matrix: Soil

MS Sample Id: 649845-001 S

Prep Method: E300P

Date Prep: 01.23.20

MSD Sample Id: 649845-001 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	32.9	249	299	107	296	106	90-110	1	20	mg/kg	01.23.20 23:33	

## Analytical Method: Chloride by EPA 300

Seq Number: 3114316

Parent Sample Id: 649845-004

Matrix: Soil

MS Sample Id: 649845-004 S

Prep Method: E300P

Date Prep: 01.23.20

MSD Sample Id: 649845-004 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	216	248	459	98	460	98	90-110	0	20	mg/kg	01.24.20 01:04	

## Analytical Method: Chloride by EPA 300

Seq Number: 3114317

Parent Sample Id: 649966-005

Matrix: Soil

MS Sample Id: 649966-005 S

Prep Method: E300P

Date Prep: 01.23.20

MSD Sample Id: 649966-005 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	1260	202	1450	94	1460	99	90-110	1	20	mg/kg	01.24.20 07:26	

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

$[D] = 100 * (C - A) / B$   
 $RPD = 200 * |(C - E) / (C + E)|$   
 $[D] = 100 * (C) / [B]$   
 Log Diff. = Log(Sample Duplicate) - Log(Original Sample)

LCS = Laboratory Control Sample  
 A = Parent Result  
 C = MS/LCS Result  
 E = MSD/LCSD Result

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



## LT Environmental, Inc.

JRU 29

## Analytical Method: Chloride by EPA 300

Seq Number: 3114317

Parent Sample Id: 649969-006

Matrix: Soil

MS Sample Id: 649969-006 S

Prep Method: E300P

Date Prep: 01.23.20

MSD Sample Id: 649969-006 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	338	299	622	95	622	95	90-110	0	20	mg/kg	01.24.20 05:55	

## Analytical Method: TPH by SW8015 Mod

Seq Number: 3114508

MB Sample Id: 7695229-1-BLK

Matrix: Solid

LCS Sample Id: 7695229-1-BKS

Prep Method: SW8015P

Date Prep: 01.25.20

LCSD Sample Id: 7695229-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Gasoline Range Hydrocarbons (GRO)	<50.0	1000	1060	106	1050	105	70-135	1	20	mg/kg	01.25.20 21:21	
Diesel Range Organics (DRO)	<15.0	1000	1180	118	1180	118	70-135	0	20	mg/kg	01.25.20 21:21	

Surrogate	MB %Rec	MB Flag	LCS %Rec	LCS Flag	LCSD %Rec	LCSD Flag	Limits	Units	Analysis Date
1-Chlorooctane	122		123		122		70-135	%	01.25.20 21:21
o-Terphenyl	130		125		113		70-135	%	01.25.20 21:21

## Analytical Method: TPH by SW8015 Mod

Seq Number: 3114508

Matrix: Solid

MB Sample Id: 7695229-1-BLK

Prep Method: SW8015P

Date Prep: 01.25.20

Parameter	MB Result	Units	Analysis Date	Flag
Motor Oil Range Hydrocarbons (MRO)	<50.0	mg/kg	01.25.20 21:00	

## Analytical Method: TPH by SW8015 Mod

Seq Number: 3114508

Parent Sample Id: 649846-001

Matrix: Soil

MS Sample Id: 649846-001 S

Prep Method: SW8015P

Date Prep: 01.25.20

MSD Sample Id: 649846-001 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Gasoline Range Hydrocarbons (GRO)	23.8	997	1070	105	996	97	70-135	7	20	mg/kg	01.25.20 22:24	
Diesel Range Organics (DRO)	<15.0	997	1140	114	1130	113	70-135	1	20	mg/kg	01.25.20 22:24	

Surrogate	MS %Rec	MS Flag	MSD %Rec	MSD Flag	Limits	Units	Analysis Date
1-Chlorooctane	128		122		70-135	%	01.25.20 22:24
o-Terphenyl	126		111		70-135	%	01.25.20 22:24

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

$[D] = 100 * (C - A) / B$   
 $RPD = 200 * |(C - E) / (C + E)|$   
 $[D] = 100 * (C) / [B]$   
 Log Diff. = Log(Sample Duplicate) - Log(Original Sample)

LCS = Laboratory Control Sample  
 A = Parent Result  
 C = MS/LCS Result  
 E = MSD/LCSD Result

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





## LT Environmental, Inc.

JRU 29

## Analytical Method: BTEX by EPA 8021B

Seq Number: 3115184

MB Sample Id: 7695650-1-BLK

Matrix: Solid

LCS Sample Id: 7695650-1-BKS

Prep Method: SW5030B

Date Prep: 01.31.20

LCSD Sample Id: 7695650-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Benzene	<0.000385	0.100	0.112	112	0.102	102	70-130	9	35	mg/kg	01.31.20 13:12	
Toluene	<0.000456	0.100	0.104	104	0.114	114	70-130	9	35	mg/kg	01.31.20 13:12	
Ethylbenzene	<0.000565	0.100	0.100	100	0.114	114	70-130	13	35	mg/kg	01.31.20 13:12	
m,p-Xylenes	<0.00101	0.200	0.197	99	0.233	117	70-130	17	35	mg/kg	01.31.20 13:12	
o-Xylene	<0.000344	0.100	0.0978	98	0.115	115	70-130	16	35	mg/kg	01.31.20 13:12	

Surrogate	MB %Rec	MB Flag	LCS %Rec	LCS Flag	LCSD %Rec	LCSD Flag	Limits	Units	Analysis Date
1,4-Difluorobenzene	106		110		110		70-130	%	01.31.20 13:12
4-Bromofluorobenzene	76		87		99		70-130	%	01.31.20 13:12

## Analytical Method: BTEX by EPA 8021B

Seq Number: 3115184

Parent Sample Id: 650807-001

Matrix: Soil

MS Sample Id: 650807-001 S

Prep Method: SW5030B

Date Prep: 01.31.20

MSD Sample Id: 650807-001 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Benzene	<0.000386	0.100	0.110	110	0.0951	94	70-130	15	35	mg/kg	01.31.20 13:53	
Toluene	<0.000457	0.100	0.107	107	0.0961	95	70-130	11	35	mg/kg	01.31.20 13:53	
Ethylbenzene	<0.000567	0.100	0.103	103	0.0914	90	70-130	12	35	mg/kg	01.31.20 13:53	
m,p-Xylenes	<0.00102	0.201	0.205	102	0.179	89	70-130	14	35	mg/kg	01.31.20 13:53	
o-Xylene	<0.000346	0.100	0.104	104	0.0884	88	70-130	16	35	mg/kg	01.31.20 13:53	

Surrogate	MS %Rec	MS Flag	MSD %Rec	MSD Flag	Limits	Units	Analysis Date
1,4-Difluorobenzene	115		118		70-130	%	01.31.20 13:53
4-Bromofluorobenzene	94		78		70-130	%	01.31.20 13:53

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

$[D] = 100 * (C - A) / B$   
 $RPD = 200 * |(C - E) / (C + E)|$   
 $[D] = 100 * (C) / [B]$   
 Log Diff. = Log(Sample Duplicate) - Log(Original Sample)

LCS = Laboratory Control Sample  
 A = Parent Result  
 C = MS/LCS Result  
 E = MSD/LCSD Result

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



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  
Phoenix, AZ (480-355-0900) Atlanta, GA (770-449-8800) Tampa, FL (813) 281-7550  
Hobbs, NM (575-392-7550)

## Chain of Custody

**Work Order No:**

1049846

[www.xenco.com](http://www.xenco.com)

Page 1 of 5

Project Manager:	Dan Moir	Bill to: (if different)	Kyle Littrell
Company Name:	LT Environmental, Inc., Permian office	Company Name:	XTO Energy
Address:	3300 North A Street	Address:	3104 E Green Street
City, State ZIP:	Midland, TX 79705	City, State ZIP:	Carlsbad, NM 88220
Phone:	432.236.3849	Email:	<a href="mailto:lbelill@ltenv.com">lbelill@ltenv.com</a>

Work Order Comments									
<b>Program:</b> UST/PST <input type="checkbox"/> PRP <input type="checkbox"/> brownfields <input type="checkbox"/> RC <input type="checkbox"/> superfund <input type="checkbox"/>									
<b>State of Project:</b>									
<b>Reporting Level:</b> I <input type="checkbox"/> level II <input type="checkbox"/> level III <input type="checkbox"/> PST/UST <input type="checkbox"/> RRP <input type="checkbox"/> level IV <input type="checkbox"/>									
<b>Deliverables:</b> EDD <input type="checkbox"/> ADaPT <input type="checkbox"/> Other: _____									

<b>SAMPLE RECEIPT</b>	Temp Blank:	(Yes) No	Wet Ice:	(Yes) No
Temperature ( $^{\circ}\text{C}$ ):	0.4	Thermometer ID		
Received Intact:	(Yes) No	T-NM-001		
Cooler Custody Seals:	Yes (No) N/A	Correction Factor: -0.2		
Sample Custody Seals:	Yes (No) N/A	Total Containers: 11		

Number of Containers

EPA 8015)									
EPA 0=8021)									
de (EPA 300.0)									





**ANALYSIS REQUEST**

									Work Order Notes
<p>TAT starts the day received by the lab, if received by 4:30pm</p>									

Sample Identification	Matrix	Date Sampled	Time Sampled	Depth	Number	TPH (E)	BTEX (E)	Chloride	Sample Comments
SP-12 L	S	1/21/20	1042	4'	1	X	X	X	
SP-12 A			1041	5'	1	X	X	X	
SP-12 B			1044	6'	1	X	X	X	
SP-12 C			1045	7'	1	X	X	X	
SP-12 D			1046	8'	1	X	X	X	
SP-12 E			1048	9'	1	X	X	X	
SP-12 F			1049	10'	1	X	X	X	
SP-12 G			1050	11'	1	X	X	X	
SP-12 H			1051	12'	1	X	X	X	
SP-12 I			1053	13'	1	X	X	X	

Circle Method(s) and Metal(s) to be analyzed	Total 200.7 / 6010	200.8 / 6020:
8RCRA 13PPM Texas 11 Al Sb As Ba Be B Cd Ca Cr Co Cu Fe Pb Mg Mn Mo Ni K Se Ag SiO <sub>2</sub> Na Sr Ti Sn U V Zn		
TCLP / SPLP 6010: 8RCRA Sb As Ba Be Cd Cr Co Cu Pb Mn Mo Ni Se Ag Ti U		1631 / 245.1 / 7470 / 7471 : Hg

Notice: Signature of this document and relinquishment of samples constitutes a valid purchase order from client company to Xenco, its affiliates and subcontractors. It assigns standard terms and conditions 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 client if such losses are due to circumstances beyond the control of Xenco. A minimum charge of \$75.00 will be applied to each project and a charge of \$5 for each sample submitted to Xenco, but not analyzed. These terms will be enforced unless previously negotiated.

Relinquished by: (Signature)	Received by: (Signature)	Date/Time	Relinquished by: (Signature)	Received by: (Signature)	Date/Time
		1/22/20 09:00			1/22/20 09:45





## Chain of Custody

**Work Order No:**

1049846

Houston, TX (281) 240-4200 Dallas, TX (214) 902-0390 San Antonio, TX (210) 509-3334  
Midland TX (432-704-5440) EL Paso, TX (915) 585-3443 Lubbock, TX (806) 794-1296  
(575-392-7550) Phoenix, AZ (480-355-0900) Atlanta, GA (770-449-8800) Tampa, FL (813)

Hobbs, NM (575-392-7550) Phoenix, AZ (480-355-0900) Atlanta, GA (770-449-8800) Tampa, FL (813-620-2000)

[www.xenco.com](http://www.xenco.com)

Page 6 of \_\_\_\_\_

Project Manager:	Dan Moir	Bill to: (if different)	Kyle Littrell
Company Name:	LT Environmental, Inc., Permian office	Company Name:	XTO Energy
Address:	3300 North A Street	Address:	3104 E Green Street
City, State ZIP:	Midland, TX 79705	City, State ZIP:	Carlsbad, NM 88220
Phone:	432.236.3849	Email:	<a href="mailto:bbellill@ltenv.com">bbellill@ltenv.com</a>

Work Order Comments	
<b>Program:</b> UST/PST <input type="checkbox"/> PRP <input type="checkbox"/> Brownfields <input type="checkbox"/> RC <input type="checkbox"/> Superfund <input type="checkbox"/> <b>State of Project:</b> <b>Reporting Level:</b> I <input type="checkbox"/> Level II <input type="checkbox"/> Level III <input type="checkbox"/> I/ST/UST <input type="checkbox"/> PRP <input type="checkbox"/> Level IV <input type="checkbox"/> <b>Deliverables:</b> EDD <input type="checkbox"/> ADAPT <input type="checkbox"/> Other:	

Project Name:	TRU 29	Turn Around	ANALYSIS REQUEST										Work Order Notes
Project Number:	012918135		Routine	<input checked="" type="checkbox"/>									
P.O. Number:			Rush:										
Sampler's Name:	Benjamin Bell		Due Date:										

SAMPLE RECEIPT		Temp Blank:		Yes	No	Wet Ice:	Yes	No
Temperature (°C):		<del>0-44</del> 41/12				Thermometer ID		
Received Intact:		Yes		No				
Cooler Custody Seals:		Yes	No	N/A		Correction Factor:		
Sample Custody Seals:		Yes	No	N/A		Total Containers:		

Number of Containers

PA 8015)





EPA 0=8021)

e (EPA 300.0)

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

Sample Identification	Matrix	Date Sampled	Time Sampled	Depth	Number	TPH (E)	BTEX (E)	Chloride	Sample Comments
SP-12 J	5	1/21/20	1054	14'	1	X	X	X	
16/20									

<b>Total 200.7 / 6010</b>	<b>200.8 / 6020:</b>	8RCRA	13PPM	Texas 11	Al	Sb	As	Ba	Be	B	Cd	Ca	Cr	Co	Cu	Fe	Pb	Mg	Mn	Mo	Ni	K	Se	Ag	SiO2	Na	Sr	Ti	Sn	U	V	Zn
<i>Circle Method(s) and Metal(s) to be analyzed</i>		TCLP / SPLP	6010:	8RCRA	Sb	As	Ba	Be	Cd	Cr	Co	Cu	Pb	Mn	Mo	Ni	Se	Ag	Ti	U												
<p>Notice: Signature of this document and relinquishment of samples constitutes a valid purchase order from client company to Xenco, its affiliates and subcontractors. It assigns standard terms and conditions 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 client if such losses are due to circumstances beyond the control of Xenco. A minimum charge of \$75.00 will be applied to each project and a charge of \$5 for each sample submitted to Xenco, but not analyzed. These terms will be enforced unless previously negotiated.</p>																																
<p>1631 / 245.1 / 7470 / 7471 : Hg</p>																																

Relinquished by: (Signature)	Received by: (Signature)	Date/Time	Relinquished by: (Signature)	Received by: (Signature)	Date/Time
		11/22/20 9:00am			11/22/20 9:45



## Inter-Office Shipment

Page 1 of 2

IOS Number **56551**

Date/Time: 01/22/20 11:52

Created by: Elizabeth McClellan

Please send report to: Jessica Kramer

Lab# From: **Carlsbad**

Delivery Priority:

Address: 1089 N Canal Street

Lab# To: **Midland**

Air Bill No.: 777580852397

E-Mail: jessica.kramer@xenco.com

Sample Id	Matrix	Client Sample Id	Sample Collection	Method	Method Name	Lab Due	HT Due	PM	Analytes	Sign
649846-001	S	SP-12	01/21/20 10:42	SW8021B	BTEX by EPA 8021B	01/28/20	02/04/20	JKR	BZ BZME EBZ XYLENES	
649846-001	S	SP-12	01/21/20 10:42	SW8015MOD_NM	TPH by SW8015 Mod	01/28/20	02/04/20	JKR	GRO-DRO PHCC10C28 PF	
649846-001	S	SP-12	01/21/20 10:42	E300_CL	Chloride by EPA 300	01/28/20	02/18/20	JKR	CL	
649846-002	S	SP-12 A	01/21/20 10:41	SW8015MOD_NM	TPH by SW8015 Mod	01/28/20	02/04/20	JKR	GRO-DRO PHCC10C28 PF	
649846-002	S	SP-12 A	01/21/20 10:41	E300_CL	Chloride by EPA 300	01/28/20	02/18/20	JKR	CL	
649846-002	S	SP-12 A	01/21/20 10:41	SW8021B	BTEX by EPA 8021B	01/28/20	02/04/20	JKR	BZ BZME EBZ XYLENES	
649846-003	S	SP-12 B	01/21/20 10:44	SW8015MOD_NM	TPH by SW8015 Mod	01/28/20	02/04/20	JKR	GRO-DRO PHCC10C28 PF	
649846-003	S	SP-12 B	01/21/20 10:44	SW8021B	BTEX by EPA 8021B	01/28/20	02/04/20	JKR	BZ BZME EBZ XYLENES	
649846-003	S	SP-12 B	01/21/20 10:44	E300_CL	Chloride by EPA 300	01/28/20	02/18/20	JKR	CL	
649846-004	S	SP-12 C	01/21/20 10:45	E300_CL	Chloride by EPA 300	01/28/20	02/18/20	JKR	CL	
649846-004	S	SP-12 C	01/21/20 10:45	SW8015MOD_NM	TPH by SW8015 Mod	01/28/20	02/04/20	JKR	GRO-DRO PHCC10C28 PF	
649846-004	S	SP-12 C	01/21/20 10:45	SW8021B	BTEX by EPA 8021B	01/28/20	02/04/20	JKR	BZ BZME EBZ XYLENES	
649846-005	S	SP-12 D	01/21/20 10:46	SW8021B	BTEX by EPA 8021B	01/28/20	02/04/20	JKR	BZ BZME EBZ XYLENES	
649846-005	S	SP-12 D	01/21/20 10:46	SW8015MOD_NM	TPH by SW8015 Mod	01/28/20	02/04/20	JKR	GRO-DRO PHCC10C28 PF	
649846-005	S	SP-12 D	01/21/20 10:46	E300_CL	Chloride by EPA 300	01/28/20	02/18/20	JKR	CL	
649846-006	S	SP-12 E	01/21/20 10:48	E300_CL	Chloride by EPA 300	01/28/20	02/18/20	JKR	CL	
649846-006	S	SP-12 E	01/21/20 10:48	SW8015MOD_NM	TPH by SW8015 Mod	01/28/20	02/04/20	JKR	GRO-DRO PHCC10C28 PF	
649846-006	S	SP-12 E	01/21/20 10:48	SW8021B	BTEX by EPA 8021B	01/28/20	02/04/20	JKR	BZ BZME EBZ XYLENES	
649846-007	S	SP-12 F	01/21/20 10:49	E300_CL	Chloride by EPA 300	01/28/20	02/18/20	JKR	CL	
649846-007	S	SP-12 F	01/21/20 10:49	SW8021B	BTEX by EPA 8021B	01/28/20	02/04/20	JKR	BZ BZME EBZ XYLENES	
649846-007	S	SP-12 F	01/21/20 10:49	SW8015MOD_NM	TPH by SW8015 Mod	01/28/20	02/04/20	JKR	GRO-DRO PHCC10C28 PF	
649846-008	S	SP-12 G	01/21/20 10:50	E300_CL	Chloride by EPA 300	01/28/20	02/18/20	JKR	CL	
649846-008	S	SP-12 G	01/21/20 10:50	SW8021B	BTEX by EPA 8021B	01/28/20	02/04/20	JKR	BZ BZME EBZ XYLENES	
649846-008	S	SP-12 G	01/21/20 10:50	SW8015MOD_NM	TPH by SW8015 Mod	01/28/20	02/04/20	JKR	GRO-DRO PHCC10C28 PF	
649846-009	S	SP-12 H	01/21/20 10:51	SW8021B	BTEX by EPA 8021B	01/28/20	02/04/20	JKR	BZ BZME EBZ XYLENES	





## Inter-Office Shipment

Page 2 of 2

IOS Number **56551**

Date/Time: 01/22/20 11:52

Created by: Elizabeth McClellan

Please send report to: Jessica Kramer

Lab# From: **Carlsbad**

Delivery Priority:

Address: 1089 N Canal Street

Lab# To: **Midland**

Air Bill No.: 777580852397

E-Mail: jessica.kramer@xenco.com

Sample Id	Matrix	Client Sample Id	Sample Collection	Method	Method Name	Lab Due	HT Due	PM	Analytes	Sign
649846-009	S	SP-12 H	01/21/20 10:51	E300_CL	Chloride by EPA 300	01/28/20	02/18/20	JKR	CL	
649846-009	S	SP-12 H	01/21/20 10:51	SW8015MOD_NM	TPH by SW8015 Mod	01/28/20	02/04/20	JKR	GRO-DRO PHCC10C28 PI	
649846-010	S	SP-12 I	01/21/20 10:53	SW8015MOD_NM	TPH by SW8015 Mod	01/28/20	02/04/20	JKR	GRO-DRO PHCC10C28 PI	
649846-010	S	SP-12 I	01/21/20 10:53	E300_CL	Chloride by EPA 300	01/28/20	02/18/20	JKR	CL	
649846-010	S	SP-12 I	01/21/20 10:53	SW8021B	BTEX by EPA 8021B	01/28/20	02/04/20	JKR	BZ BZME EBZ XYLENES	
649846-011	S	SP-12 J	01/21/20 10:54	E300_CL	Chloride by EPA 300	01/28/20	02/18/20	JKR	CL	
649846-011	S	SP-12 J	01/21/20 10:54	SW8021B	BTEX by EPA 8021B	01/28/20	02/04/20	JKR	BZ BZME EBZ XYLENES	
649846-011	S	SP-12 J	01/21/20 10:54	SW8015MOD_NM	TPH by SW8015 Mod	01/28/20	02/04/20	JKR	GRO-DRO PHCC10C28 PI	

## Inter Office Shipment or Sample Comments:

Relinquished By:

Elizabeth McClellan

Date Relinquished: 01/22/2020

Received By:

Brianna Teel

Date Received: 01/23/2020 11:20

Cooler Temperature: 0.3



## XENCO Laboratories

## Inter Office Report- Sample Receipt Checklist

Sent To: Midland

IOS #: 56551

Acceptable Temperature Range: 0 - 6 degC

Air and Metal samples Acceptable Range: Ambient

Temperature Measuring device used : R8

Sent By: Elizabeth McClellan

Date Sent: 01/22/2020 11:52 AM

Received By: Brianna Teel

Date Received: 01/23/2020 11:20 AM

## Sample Receipt Checklist

## Comments

#1 *Temperature of cooler(s)?	.3
#2 *Shipping container in good condition?	Yes
#3 *Samples received with appropriate temperature?	Yes
#4 *Custody Seals intact on shipping container/ cooler?	Yes
#5 *Custody Seals Signed and dated for Containers/coolers	Yes
#6 *IOS present?	Yes
#7 Any missing/extra samples?	No
#8 IOS agrees with sample label(s)/matrix?	Yes
#9 Sample matrix/ properties agree with IOS?	Yes
#10 Samples in proper container/ bottle?	Yes
#11 Samples properly preserved?	Yes
#12 Sample container(s) intact?	Yes
#13 Sufficient sample amount for indicated test(s)?	Yes
#14 All samples received within hold time?	Yes

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

NonConformance:

Corrective Action Taken:

## Nonconformance Documentation

Contact: \_\_\_\_\_ Contacted by : \_\_\_\_\_ Date: \_\_\_\_\_

Checklist reviewed by:

Brianna Teel

Date: 01/23/2020





# XENCO Laboratories

## Prelogin/Nonconformance Report- Sample Log-In

Client: LT Environmental, Inc.

Date/ Time Received: 01/22/2020 09:45:00 AM

Work Order #: 649846

Acceptable Temperature Range: 0 - 6 degC

Air and Metal samples Acceptable Range: Ambient

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 container/ 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 relinquished/ received?	Yes	
#10 Chain of Custody agrees with sample labels/matrix?	Yes	
#11 Container label(s) legible and intact?	Yes	
#12 Samples in proper container/ bottle?	Yes	
#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)?	Yes	Subbed to Midland
#18 Water VOC samples have zero headspace?	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: 01/22/2020

Checklist reviewed by:

Jessica Kramer

Date: 01/23/2020

# **Analytical Report 655037**

**for  
LT Environmental, Inc.**

**Project Manager: Dan Moir**

**JRU 29**

**012918135**

**10-MAR-20**

Collected By: Client



**1089 N Canal Street  
Carlsbad, NM 88220**

Xenco-Houston (EPA Lab Code: TX00122):

Texas (T104704215-19-30), Arizona (AZ0765), Florida (E871002-24), Louisiana (03054)  
Oklahoma (2019-058), North Carolina (681), Arkansas (19-037-0)

Xenco-Dallas (EPA Lab Code: TX01468):

Texas (TX104704295-19-22), Arizona (AZ0809), Arkansas (17-063-0)

Xenco-El Paso (EPA Lab Code: TX00127): Texas (T104704221-19-16)

Xenco-Lubbock (EPA Lab Code: TX00139): Texas (T104704219-19-21)

Xenco-Midland (EPA Lab Code: TX00158): Texas (T104704400-19-19)

Xenco-Carlsbad (LELAP): Louisiana (05092)

Xenco-San Antonio (EPA Lab Code: TNI02385): Texas (T104704534-19-5)

Xenco Phoenix (EPA Lab Code: AZ00901): Arizona (AZ0757)

Xenco-Tampa: Florida (E87429), North Carolina (483)



10-MAR-20

Project Manager: **Dan Moir**

**LT Environmental, Inc.**

4600 W. 60th Avenue

Arvada, CO 80003

Reference: XENCO Report No(s): **655037**

**JRU 29**

Project Address:

**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 XENCO Report Number(s) 655037. 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 XENCO Laboratories. 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. 655037 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 XENCO Laboratories to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

A handwritten signature in black ink that reads 'Jessica Kramer'.

---

**Jessica Kramer**

Project Manager

***Recipient of the Prestigious Small Business Administration Award of Excellence in 1994.***

*Certified and approved by numerous States and Agencies.*

*A Small Business and Minority Status Company that delivers SERVICE and QUALITY*

Houston - Dallas - Midland - San Antonio - Phoenix - Oklahoma - Latin America



## Sample Cross Reference 655037

LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id	Matrix	Date Collected	Sample Depth	Lab Sample Id
FS01	S	03-09-20 13:40	5.5 ft	655037-001



## CASE NARRATIVE

**Client Name:** *LT Environmental, Inc.*

**Project Name:** *JRU 29*

Project ID: 012918135

Work Order Number(s): 655037

Report Date: 10-MAR-20

Date Received: 03/09/2020

---

**Sample receipt non conformances and comments:**

---

**Sample receipt non conformances and comments per sample:**

None

**Analytical non conformances and comments:**

Batch: LBA-3119031 BTEX by EPA 8021B

Soil samples were not received in Terracore kits and therefore were prepared by method 5030.



# Certificate of Analysis Summary 655037

LT Environmental, Inc., Arvada, CO

Project Name: JRU 29

Project Id: 012918135

Contact: Dan Moir

Project Location:

Date Received in Lab: Mon Mar-09-20 03:03 pm

Report Date: 10-MAR-20

Project Manager: Jessica Kramer

<b>Analysis Requested</b>	<b>Lab Id:</b>	655037-001					
	<b>Field Id:</b>	FS01					
	<b>Depth:</b>	5.5- ft					
	<b>Matrix:</b>	SOIL					
	<b>Sampled:</b>	Mar-09-20 13:40					
<b>BTEX by EPA 8021B</b>	<b>Extracted:</b>	Mar-09-20 15:30					
	<b>Analyzed:</b>	Mar-10-20 02:19					
	<b>Units/RL:</b>	mg/kg RL					
Benzene		<0.00200 0.00200					
Toluene		<0.00200 0.00200					
Ethylbenzene		<0.00200 0.00200					
m,p-Xylenes		<0.00401 0.00401					
o-Xylene		<0.00200 0.00200					
Total Xylenes		<0.00200 0.00200					
Total BTEX		<0.00200 0.00200					
<b>Chloride by EPA 300</b>	<b>Extracted:</b>	Mar-09-20 16:00					
	<b>Analyzed:</b>	Mar-09-20 20:01					
	<b>Units/RL:</b>	mg/kg RL					
Chloride		2200 50.0					
<b>TPH by SW8015 Mod</b>	<b>Extracted:</b>	Mar-09-20 17:00					
	<b>Analyzed:</b>	Mar-10-20 05:29					
	<b>Units/RL:</b>	mg/kg RL					
Gasoline Range Hydrocarbons (GRO)		<49.8 49.8					
Diesel Range Organics (DRO)		<49.8 49.8					
Motor Oil Range Hydrocarbons (MRO)		<49.8 49.8					
Total GRO-DRO		<49.8 49.8					
Total TPH		<49.8 49.8					

This analytical report, and the entire data package it represents, has been made for your exclusive and confidential use. The interpretations and results expressed throughout this analytical report represent the best judgment of XENCO Laboratories. XENCO Laboratories assumes no responsibility and makes no warranty to the end use of the data hereby presented. Our liability is limited to the amount invoiced for this work order unless otherwise agreed to in writing.

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

Jessica Kramer  
Project Manager





# Certificate of Analytical Results 655037

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **FS01**  
Lab Sample Id: 655037-001

Matrix: Soil  
Date Collected: 03.09.20 13.40

Date Received: 03.09.20 15.03  
Sample Depth: 5.5 ft

Analytical Method: Chloride by EPA 300

Tech: MAB

Analyst: MAB

Seq Number: 3119022

Date Prep: 03.09.20 16.00

Prep Method: E300P

% Moisture:

Basis: Wet Weight

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	2200	50.0	mg/kg	03.09.20 20.01		5

Analytical Method: TPH by SW8015 Mod

Tech: DTH

Analyst: DTH

Seq Number: 3119055

Date Prep: 03.09.20 17.00

Prep Method: SW8015P

% 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	03.10.20 05.29	U	1
Diesel Range Organics (DRO)	C10C28DRO	<49.8	49.8	mg/kg	03.10.20 05.29	U	1
Motor Oil Range Hydrocarbons (MRO)	PHCG2835	<49.8	49.8	mg/kg	03.10.20 05.29	U	1
Total GRO-DRO	PHC628	<49.8	49.8	mg/kg	03.10.20 05.29	U	1
Total TPH	PHC635	<49.8	49.8	mg/kg	03.10.20 05.29	U	1

Surrogate	Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
1-Chlorooctane	111-85-3	103	%	70-135	03.10.20 05.29	
o-Terphenyl	84-15-1	112	%	70-135	03.10.20 05.29	



# Certificate of Analytical Results 655037

## LT Environmental, Inc., Arvada, CO

JRU 29

Sample Id: **FS01**  
Lab Sample Id: 655037-001

Matrix: Soil  
Date Collected: 03.09.20 13.40

Date Received: 03.09.20 15.03  
Sample Depth: 5.5 ft

Analytical Method: BTEX by EPA 8021B

Prep Method: SW5030B

Tech: MAB

% Moisture:

Analyst: MAB

Date Prep: 03.09.20 15.30

Basis: Wet Weight

Seq Number: 3119031

Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Benzene	71-43-2	<0.00200	0.00200	mg/kg	03.10.20 02.19	U	1
Toluene	108-88-3	<0.00200	0.00200	mg/kg	03.10.20 02.19	U	1
Ethylbenzene	100-41-4	<0.00200	0.00200	mg/kg	03.10.20 02.19	U	1
m,p-Xylenes	179601-23-1	<0.00401	0.00401	mg/kg	03.10.20 02.19	U	1
o-Xylene	95-47-6	<0.00200	0.00200	mg/kg	03.10.20 02.19	U	1
Total Xylenes	1330-20-7	<0.00200	0.00200	mg/kg	03.10.20 02.19	U	1
Total BTEX		<0.00200	0.00200	mg/kg	03.10.20 02.19	U	1
<b>Surrogate</b>	<b>Cas Number</b>	<b>% Recovery</b>	<b>Units</b>	<b>Limits</b>	<b>Analysis Date</b>	<b>Flag</b>	
4-Bromofluorobenzene	460-00-4	96	%	70-130	03.10.20 02.19		
1,4-Difluorobenzene	540-36-3	107	%	70-130	03.10.20 02.19		



## 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.

\*\* Surrogate recovered outside laboratory control limit.

**BRL** Below Reporting Limit.

**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



## LT Environmental, Inc.

JRU 29

## Analytical Method: Chloride by EPA 300

Seq Number: 3119022

MB Sample Id: 7698414-1-BLK

Matrix: Solid

LCS Sample Id: 7698414-1-BKS

Prep Method: E300P

Date Prep: 03.09.20

LCSD Sample Id: 7698414-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	<10.0	250	258	103	263	105	90-110	2	20	mg/kg	03.09.20 19:19	

## Analytical Method: Chloride by EPA 300

Seq Number: 3119022

Parent Sample Id: 654990-026

Matrix: Soil

MS Sample Id: 654990-026 S

Prep Method: E300P

Date Prep: 03.09.20

MSD Sample Id: 654990-026 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	3480	248	3760	113	3770	117	90-110	0	20	mg/kg	03.09.20 19:37	X

## Analytical Method: TPH by SW8015 Mod

Seq Number: 3119055

MB Sample Id: 7698462-1-BLK

Matrix: Solid

LCS Sample Id: 7698462-1-BKS

Prep Method: SW8015P

Date Prep: 03.09.20

LCSD Sample Id: 7698462-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Gasoline Range Hydrocarbons (GRO)	<50.0	1000	916	92	927	93	70-135	1	35	mg/kg	03.10.20 09:41	
Diesel Range Organics (DRO)	<50.0	1000	916	92	914	91	70-135	0	35	mg/kg	03.10.20 09:41	
Surrogate	MB %Rec	MB Flag	LCS %Rec	LCS Flag	LCSD %Rec	LCSD Flag	Limits	Units	Analysis Date			
1-Chlorooctane	96		107		100		70-135	%	03.10.20 09:41			
o-Terphenyl	106		111		104		70-135	%	03.10.20 09:41			

## Analytical Method: TPH by SW8015 Mod

Seq Number: 3119055

Matrix: Solid

MB Sample Id: 7698462-1-BLK

Prep Method: SW8015P

Date Prep: 03.09.20

Parameter	MB Result	Units	Analysis Date	Flag
Motor Oil Range Hydrocarbons (MRO)	<50.0	mg/kg	03.10.20 09:21	

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

$[D] = 100 * (C-A) / B$   
 $RPD = 200 * |(C-E) / (C+E)|$   
 $[D] = 100 * (C) / [B]$   
 Log Diff. = Log(Sample Duplicate) - Log(Original Sample)

LCS = Laboratory Control Sample  
 A = Parent Result  
 C = MS/LCS Result  
 E = MSD/LCSD Result

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



## LT Environmental, Inc.

JRU 29

## Analytical Method: TPH by SW8015 Mod

Seq Number: 3119055

Parent Sample Id: 654990-026

Matrix: Soil

MS Sample Id: 654990-026 S

Prep Method: SW8015P

Date Prep: 03.09.20

MSD Sample Id: 654990-026 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Gasoline Range Hydrocarbons (GRO)	<49.9	997	962	96	984	98	70-135	2	35	mg/kg	03.10.20 04:28	
Diesel Range Organics (DRO)	<49.9	997	939	94	956	96	70-135	2	35	mg/kg	03.10.20 04:28	

## Surrogate

	MS %Rec	MS Flag	MSD %Rec	MSD Flag	Limits	Units	Analysis Date
1-Chlorooctane	130		119		70-135	%	03.10.20 04:28
o-Terphenyl	125		125		70-135	%	03.10.20 04:28

## Analytical Method: BTEX by EPA 8021B

Seq Number: 3119031

MB Sample Id: 7698418-1-BLK

Matrix: Solid

LCS Sample Id: 7698418-1-BKS

Prep Method: SW5030B

Date Prep: 03.09.20

LCSD Sample Id: 7698418-1-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	0.107	107	0.108	108	70-130	1	35	mg/kg	03.09.20 23:36	
Toluene	<0.00200	0.100	0.102	102	0.104	104	70-130	2	35	mg/kg	03.09.20 23:36	
Ethylbenzene	<0.00200	0.100	0.0961	96	0.0989	99	71-129	3	35	mg/kg	03.09.20 23:36	
m,p-Xylenes	<0.00400	0.200	0.196	98	0.204	102	70-135	4	35	mg/kg	03.09.20 23:36	
o-Xylene	<0.00200	0.100	0.0995	100	0.103	103	71-133	3	35	mg/kg	03.09.20 23:36	

## Surrogate

	MB %Rec	MB Flag	LCS %Rec	LCS Flag	LCSD %Rec	LCSD Flag	Limits	Units	Analysis Date
1,4-Difluorobenzene	107		107		108		70-130	%	03.09.20 23:36
4-Bromofluorobenzene	94		93		94		70-130	%	03.09.20 23:36

## Analytical Method: BTEX by EPA 8021B

Seq Number: 3119031

Parent Sample Id: 654990-026

Matrix: Soil

MS Sample Id: 654990-026 S

Prep Method: SW5030B

Date Prep: 03.09.20

MSD Sample Id: 654990-026 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Benzene	<0.00199	0.0994	0.0852	86	0.0958	96	70-130	12	35	mg/kg	03.10.20 00:16	
Toluene	<0.00199	0.0994	0.0807	81	0.0905	91	70-130	11	35	mg/kg	03.10.20 00:16	
Ethylbenzene	<0.00199	0.0994	0.0747	75	0.0835	84	71-129	11	35	mg/kg	03.10.20 00:16	
m,p-Xylenes	<0.00398	0.199	0.152	76	0.169	85	70-135	11	35	mg/kg	03.10.20 00:16	
o-Xylene	<0.00199	0.0994	0.0762	77	0.0852	85	71-133	11	35	mg/kg	03.10.20 00:16	

## Surrogate

	MS %Rec	MS Flag	MSD %Rec	MSD Flag	Limits	Units	Analysis Date
1,4-Difluorobenzene	107		107		70-130	%	03.10.20 00:16
4-Bromofluorobenzene	96		93		70-130	%	03.10.20 00:16

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

$[D] = 100 * (C - A) / B$   
 $RPD = 200 * |(C - E) / (C + E)|$   
 $[D] = 100 * (C) / [B]$   
 Log Diff. = Log(Sample Duplicate) - Log(Original Sample)

LCS = Laboratory Control Sample  
 A = Parent Result  
 C = MS/LCS Result  
 E = MSD/LCSD Result

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





## Chain of Custody

**Work Order No:**

05037

Houston, TX (281) 240-4200 Dallas, TX (214) 902-0300 San Antonio, TX (210) 505-3334  
Midland, TX (432) 704-5440 El Paso, TX (915) 585-3443 Lubbock, TX (806) 794-1296  
Phoenix, AZ (480) 355-0900 Atlanta, GA (770) 445-8800 Tampa, FL (813) 520-2000 West Palm Beach, FL (561) 689-6111

[www.xenco.com](http://www.xenco.com)

Page \_\_\_\_\_ of \_\_\_\_\_

Project Manager:	Don Meir	Bill to: (if different)	Kyle Littlell
Company Name:	LT Environmental, Inc. Permian Office	Company Name:	XTO Energy
Address:	3300 North A Street	Address:	3104 East Green Street
City, State ZIP:	Midland, TX 79705	City, State ZIP:	Carlsbad, NM 88220
Phone:	432-236-3849	Email:	slc@henry.com, dmeir@henry.com, kcole@henry.com

**Work Order Comments**

**Program:** UST/PST ☐ PRP ☐ Brownfields ☐ RRC ☐ Superfund ☐

**State of Project:**

Reporting Level II ☐ Level III ☐ PST/UST ☐ TRRP ☐ Level IV ☐

Deliverables: EDD ☐ ADaPT ☐ Other: \_\_\_\_\_

Project Name:	JRU 24	Turn Around
Project Number:	012918135	Routine <input type="checkbox"/>
Project Location		Rush: 24H
Sampler's Name:		Due Date:
PO #:		Quote #:

[illegible]

SAMPLE RECEIPT	Temp Blank:		Wet Ice:	
	Yes	No	Yes	No
Temperature (°C):	3.6		Thermometer ID	
Received intact:	Yes	No	T-NM-007	
Cooler Custody Seals:	Yes	No	Correction Factor:	-0.2
Sample Custody Seals:	Yes	No	Total Containers:	1

HCl: HL
NaOH: Na
Zn Acetate+ NaOH: Zn
TAT starts the day received by the lab. If received by 4:00pm

[illegible]

Total 200.7 / 6010 200.8 / 6020:

Circle Method(s) and Metal(s) to be analyzed

8RCRA	13PPM	Texas	11	Al	Sb	As	Ba	Be	B	Cd	Ca	Cr	Co	Cu	Fe	Pb	Mg	Mn	Mo	Ni	K	Se	Ag	SiO <sub>2</sub>	Na	Sr	Ti	Sn	U	V	Zn
TCLP / SPLP 6010: 8RCRA																															
Sb As Ba Be Cd Cr Co Cu Pb Mn Mo Ni Se Ag Ti U																															
1631 / 245.1 / 7470																															

1631 / 245.1 / 7470 / 7471 : Hg

Notice: Signature of this document and realignment of samples constitutes a valid purchase order from client company to Xencio, its affiliates and subcontractors. It assigns standard terms and conditions of service. Xencio will be liable only for the cost of samples and shall not assume any responsibility for any losses or expenses incurred by the client if such losses are due to circumstances beyond the control of Xencio. A minimum charge of \$75.00 will be applied to each project and a charge of \$5 for each sample submitted to Xencio, but not analyzed. These terms will be enforced unless previously negotiated.

Relinquished by: (Signature)	Received by: (Signature)	Date/Time	Relinquished by: (Signature)	Received by: (Signature)	Date/Time
[Signature]	[Signature]	3/9/20 1503			



## XENCO Laboratories

## Prelogin/Nonconformance Report- Sample Log-In

Client: LT Environmental, Inc.

Date/ Time Received: 03.09.2020 03.03.00 PM

Work Order #: 655037

Acceptable Temperature Range: 0 - 6 degC

Air and Metal samples Acceptable Range: Ambient

Temperature Measuring device used : T-NM-007

Sample Receipt Checklist	Comments
#1 *Temperature of cooler(s)?	3.6
#2 *Shipping container in good condition?	Yes
#3 *Samples received on ice?	Yes
#4 *Custody Seals intact on shipping container/ 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 relinquished/ received?	Yes
#10 Chain of Custody agrees with sample labels/matrix?	Yes
#11 Container label(s) legible and intact?	Yes
#12 Samples in proper container/ bottle?	Yes
#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 headspace?	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: 03.09.2020

Checklist reviewed by:



Jessica Kramer

Date: 03.10.2020

**Green, Garrett J**

---

**From:** Harimon, Jocelyn, EMNRD <Jocelyn.Harimon@state.nm.us>  
**Sent:** Wednesday, August 3, 2022 1:25 PM  
**To:** Green, Garrett J  
**Cc:** Billings, Bradford, EMNRD  
**Subject:** RE: [EXTERNAL] Response to denial of C141 for incident ID (n#) nAB1518142271, Application ID: 8143

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** External Sender

**External Email – Think Before You Click**

To whom it may concern,

Regarding incident ID (n#) nAB1518142271, Application ID: 8143.

Please resubmit the C-141 closure request/report through our application portal. Please include a copy of this email correspondence and all attachments. The OCD will review the resubmitted application in the order it is received.

If you have any other questions or concerns, please feel free to contact me.

JH

**Jocelyn Harimon** • Environmental Specialist  
Environmental Bureau  
EMNRD - Oil Conservation Division  
1220 South St. Francis Drive | Santa Fe, NM 87505  
(505)469-2821 | [Jocelyn.Harimon@state.nm.us](mailto:Jocelyn.Harimon@state.nm.us)  
[http:// www.emnrd.nm.gov](http://www.emnrd.nm.gov)



---

**From:** Green, Garrett J <garrett.green@exxonmobil.com>  
**Sent:** Thursday, July 21, 2022 1:03 PM  
**To:** Harimon, Jocelyn, EMNRD <Jocelyn.Harimon@state.nm.us>  
**Cc:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Pennington, Shelby G <shelby.g.pennington@exxonmobil.com>  
**Subject:** [EXTERNAL] Response to denial of C141 for incident ID (n#) nAB1518142271, Application ID: 8143

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Ms. Harimon,

XTO is requesting NMOCD reconsider denial of the C141/Closure Request for incident ID (n#) nAB1518142271. NMOCD recently denied the closure request for the following reasons:

- Depth to ground water is insufficiently defined
- Unclear confirmation samples - Not vertically defined

XTO would like to clarify that a borehole was drilled at the site to confirm depth to water is greater than 100 feet. I have attached a boring log and a revised site map showing the location of that boring. As stated in the report, the boring was drilled in January of 2020 to 110 feet bgs and left open for over 72 hours to allow for potential infill of groundwater. No groundwater was observed in the borehole following the 72-hour waiting period and groundwater was confirmed to be greater than 100 feet deep.

Regarding a lack of vertical delineation/definition, all of the samples collected from the delineation borings advanced within the release footprint (SP-4, SP-6, SP-7/SP-11, SP-8, SP-9, SP-10, and SP-12) and depicted in Figure 3 of the report meet the site-specific closure criteria for chloride and each boring was advanced until samples met the strictest closure criteria (600 mg/kg). This ranges from 4 feet bgs in SP-6 to 23 feet bgs in SP-11 and generally occurs near 10 feet bgs in the majority of the boreholes.

XTO acknowledges that confirmation sampling to confirm removal of impacted material does not follow Part 29 guidance. However, please consider the circumstances of the timing and approach. First of all, the excavation included removal of 33,000 cubic yards of material and occurred in 2018 under the conditions of an NMOCD-approved corrective action plan. The confirmation samples were collected in a manner generally acceptable at that time when liner installations were included in the scope of work. These included discrete sidewall samples, but no floor samples. The floor samples were deemed unnecessary because the entirety of the top 4 feet of impacted material in the pasture was removed and because delineation sampling defined the concentration of chloride remaining in place below 4 feet. The highest chloride concentrations documented in samples collected from 4 feet or greater in the delineation borings ranged from 529 mg/kg to 15,600 mg/kg. None of the concentrations exceeded 20,000 mg/kg. Please reference Table 1 of the report.

In summary, a depth to water boring confirmed that groundwater is greater than 100 feet at the site and that the closure criteria applied was correct. The top 4 feet of material within the release footprint in the pasture was removed and sidewall samples confirm remaining soil in the top 4 feet meet the reclamation standard (600 mg/kg chloride). Material remaining in place beneath 4 feet bgs meets the site-specific closure criteria as documented by 59 discrete delineation samples collected from depths ranging from 4 feet bgs to 26 feet bgs. The delineation samples additionally document vertical delineation to the strictest closure criteria (600 mg/kg chloride). The excavation was conducted in 2018 and removed 33,000 cubic yards of material. The excavation was backfilled and collection of composite confirmation samples from the floor of the excavation is no longer practical. XTO believes the discrete sidewall samples define lateral delineation and the delineation samples provide sufficient data to characterize remaining chloride concentrations in the soil below 4 feet bgs. In light of these clarifications, XTO respectfully requests NMOCD review this additional information and reconsider the denial.

If NMOCD prefers a meeting, XTO is open to a video conference or in-person meeting to discuss the unique details of this project.

Thank You,

**Garrett Green**

Environmental Coordinator

Delaware Business Unit

(575) 200-0729

[Garrett.Green@ExxonMobil.com](mailto:Garrett.Green@ExxonMobil.com)

XTO Energy, Inc.

3104 E. Greene Street | Carlsbad, NM 88220 | M: (575)200-0729

**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  
**District IV**  
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 136535

CONDITIONS

Operator: XTO ENERGY, INC 6401 Holiday Hill Road Midland, TX 79707	OGRID: 5380
	Action Number: 136535
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
jharimon	None	9/20/2022