



July 21, 2023

Brittany Hall  
Projects Environmental Specialist  
New Mexico Energy, Minerals, and Natural Resources Department  
1220 South St. Francis Drive  
Santa Fe, NM 87505

**RE: Closure Report  
ConocoPhillips  
Heritage Concho  
SRO State Com #46H  
Unit Letter D, Section 05, Township 26 South, Range 28 East  
Eddy County, New Mexico  
Incident ID: nAB1803638110**

Ms. Hall:

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips Company (ConocoPhillips) to assess a Heritage Concho release associated with the SRO State Com #46H well (associated API No. 30-015-41866) and tank battery. The release footprint is located in Public Land Survey System (PLSS) Unit Letter D, Section 05, Township 26 South, Range 28 East, in Eddy County, New Mexico (Site). The approximate release point occurred at coordinates 32.077915°, -104.116165°, as shown on Figures 1 and 2.

## BACKGROUND

According to the State of New Mexico Oil Conservation Division (NMOCD) C-141 Initial Report, the release occurred when a valve that was left open on the free water knockout (FWKO) sent excess fluid to the oil tanks, resulting in an overflow into the secondary containment. While the majority of the fluid remained inside of the lined containment, there was some overspray in the pasture adjacent to the location. The release consisted of approximately 8 barrels (bbls) of oil and 35 bbls of produced water. A vacuum truck recovered 8 bbls of oil and 33 bbls of produced water during the initial response activities. The NMOCD approved the initial C-141 on February 1, 2018 and subsequently assigned the release the Incident ID nAB1803638110 and the remediation permit (RP) number 2RP-4600. The initial C-141 form is included in Appendix A.

## SITE CHARACTERIZATION

A site characterization was performed and no sinkholes, residences, schools, hospitals, institutions, churches, springs, private domestic water wells, stream bodies, wetlands, incorporated municipal boundaries, subsurface mines, or floodplains are located within the distances specified in 19.15.29 New Mexico Administrative Code (NMAC). There are two mapped water bodies approximately 0.25 miles east of the release site. The Site is in an area of high karst potential.

There are no water wells listed in the New Mexico Office of the State Engineer (NMOSE) database located within approximately 0.5 miles (800 meters) of the Site. The nearest well with recent groundwater data is located approximately 1.75 miles from the Site, with a depth to water of 30 feet below ground surface (bgs). The site characterization data are presented in Appendix B.

**TETRA TECH**

901 West Wall St., Suite 100, Midland, TX 79701  
Tel 432.682.4559 Fax 432.682.3946 [www.tetrattech.com](http://www.tetrattech.com)

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ConocoPhillips

## REGULATORY FRAMEWORK

Based upon the release footprint and in accordance with Subsection E of 19.15.29.12 NMAC, per 19.15.29.11 NMAC, the site characterization data was used to determine recommended remedial action levels (RRALs) for benzene, toluene, ethylbenzene, and xylene (collectively referred to as BTEX), total petroleum hydrocarbons (TPH), and chlorides in soil.

Based on the site characterization (high karst potential and proximity to mapped water bodies) and the lack of groundwater data within 0.5 miles of the release Site, and in accordance with Table I of 19.15.29.12 NMAC, the RRALs for the Site are as follows:

Constituent	Site RRAL
Chloride	600 mg/kg
TPH (GRO+DRO+MRO)	100 mg/kg
BTEX	50 mg/kg
Benzene	10 mg/kg

## INITIAL SITE ASSESSMENT AND 2018 WORK PLAN

COG Operating LLC (Concho) conducted assessment sampling activities in February and March 2018. One (1) trench (T-1) was advanced to 2 feet bgs within the release extent in the overspray area south of the tank battery to achieve vertical delineation of the release. Three (3) sample points (south, east, and west) were installed along the perimeter of the release to achieve horizontal delineation. Figure 3 shows the approximate release extent and sample locations from the initial assessment. The results of the initial soil assessment are summarized in Table 1.

COG Operating, LLC (COG) submitted a Remediation Work Plan dated November 7, 2018, which described the initial site assessment activities and a remediation plan. The proposed remediation plan consisted of excavating the impacted area in the vicinity of T-1 to a depth of 1.5-2 feet bgs and the impacted area of the south sample location to a depth of 6 inches to 1-foot bgs. Composite confirmation samples would be collected with an estimated volume of 60 to 80 cubic yards of soil to be removed.

The Remediation Work Plan was approved by NMOCD on December 1, 2022, with the following comments:

- *“Perform liner inspection to ensure integrity of liner. Include pictures of liner inspection in final report.*
- *Remediation and closure must comply with 19.15.29.12 and 19.15.29.13 NMAC.*
- *2RP-4600 closed. Please reference incident #NAB1803638110 in all future communication.*
- *Submit a complete report through the OCD Permitting website by 3/3/2023.”*

An extension request to June 3, 2023 was approved in an email dated March 3, 2023. According to the NMOCD Oil and Gas Map, the site is located on State Trust Lands. As of December 1, 2022 New Mexico State Land Office's Cultural Properties Protection (CPP) Rule is in effect.

In tandem with this CPP rule, the NMSLO has begun enforcing application and permitting requirements per Rule 12 (19.2.12 NMAC) for Water/Soil Boring Exploration Permits. Any intrusive activities must be permitted through the Water Bureau, Oil, Gas, and Minerals Division, New Mexico State Land Office. Tetra Tech and ConocoPhillips experienced a delay in scheduling additional assessment and remediation activities at the release Site while in the process of complying with these rules. A copy of the regulatory correspondence is included as Appendix C.

## ADDITIONAL SITE ASSESSMENT AND SAMPLING RESULTS

Tetra Tech conducted additional soil sampling at the Site on behalf of ConocoPhillips to assess the current soil concentration levels within the reported release footprint prior to remedial action. On May 2, 2023, Tetra



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Tetra Tech installed five (5) hand auger borings (AH-23-1 through AH-23-5) in the reported release extent to 1-foot bgs each. The May 2023 additional sampling locations are presented in Figure 4.

A total of five (5) soil samples sent to Cardinal Laboratories in Hobbs, New Mexico to be analyzed for chloride via EPA Method 4500.0, TPH via EPA Method 8015M, and BTEX via EPA Method 8261B. A copy of the laboratory analytical report and chain-of-custody documentation are included in Appendix D.

Analytical results from the 2023 confirmation sampling activities are summarized in Table 2. Analytical results associated with sample locations AH-23-1 and AH-23-4 exceeded the TPH RRAL of 100 mg/kg. All other analytical results were below the Site RRALs for all constituents.

## REMEDIATION ACTIVITIES AND CONFIRMATION SAMPLING

In July 2023, Tetra Tech personnel were onsite to perform the liner inspection and remediate the release extent (as proposed in the approved Work Plan and confirmed by the May 2023 additional assessment activities), including excavation, disposal and backfill.

On July 6, 2023, Tetra Tech personnel performed an inspection of the liner within the secondary containment of the SRO State Com #46H – Tank Battery. The base course/gravel material was removed by hand in order to expose the polyethylene liner beneath. The clean base course/gravel material was carefully extracted from the area surrounding the tanks and the surrounding vicinity. The liner was observed to underlie the release point within the secondary containment area. The liner was intact, with no visible rips or tears and encompassed by a 2-foot-tall earthen berm. The liner extended up and over the earthen berm and was anchored on the exterior side.

Following the liner inspection, the release extent of impacted soils outside the berm and battery facility was excavated to 2 feet bgs. Photographs from the liner inspection and excavated areas prior to backfill are provided in Appendix E.

All of the excavated material was transported offsite for proper disposal. Approximately thirty-two (32) cubic yards of material were transported to the R360 Halfway Facility in Hobbs, New Mexico. Copies of the waste manifests are included in Appendix E.

Prior to confirmation sampling, in accordance with Subsection D of 19.15.29.12 NMAC, the NMOCD district office was notified via email on June 29, 2023. Documentation of associated regulatory correspondence is included in Appendix C. On July 5, 2023, Tetra Tech personnel were onsite for confirmation sampling. Confirmation floor and sidewall samples were collected for laboratory analysis to verify that the impacted materials were properly removed. Each confirmation sample laboratory analytical result was directly compared to the proposed RRALs to demonstrate compliance.

Confirmation samples were collected such that each discrete sample (sidewall and floor) were representative of no more than 200 square feet of excavated area. A total of two (2) floor sample locations and three (3) sidewall sample locations were used during the remedial activities. Confirmation sidewall sample locations were labeled with "SW"-#, and confirmation floor sample locations were labeled with "FS"-#. Analytical results for all confirmation soil samples (floor and sidewall) were below the respective RRALs for chloride, BTEX, and TPH. The results of the May 2023 confirmation sampling events are summarized in Table 3. Laboratory analytical data is included in Appendix F. Excavated areas, depths and confirmation sample locations are shown in Figure 5.

## CONCLUSION

Based on the results of the liner inspection, remediation activities performed, and confirmation sampling results, ConocoPhillips respectfully requests closure of the subject incident. The release occurred within a lined containment area. The liner integrity demonstration is complete. The affected area of the liner has

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been visually inspected where the release occurred, and the liner remains intact and had the ability to contain the leak in question.

The final C-141 forms are enclosed in Appendix A. If you have any questions concerning the remediation activities for the Site, please call me at (512) 739-7874.

Sincerely,  
**Tetra Tech, Inc.**



Samantha Abbott, P.G.  
Project Manager



Christian M. Llull, P.G.  
Program Manager

cc:  
Mr. Moises H. Cantu Garcia, PBU – ConocoPhillips

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ConocoPhillips

## LIST OF ATTACHMENTS

### Figures:

- Figure 1 – Overview Map
- Figure 2 – Topographic Map
- Figure 3 – Approximate Release Extent and Site Assessment (COG)
- Figure 4 – Approximate Release Extent and Additional Assessment (Tetra Tech)
- Figure 5 – Proposed Remediation (Tetra Tech)

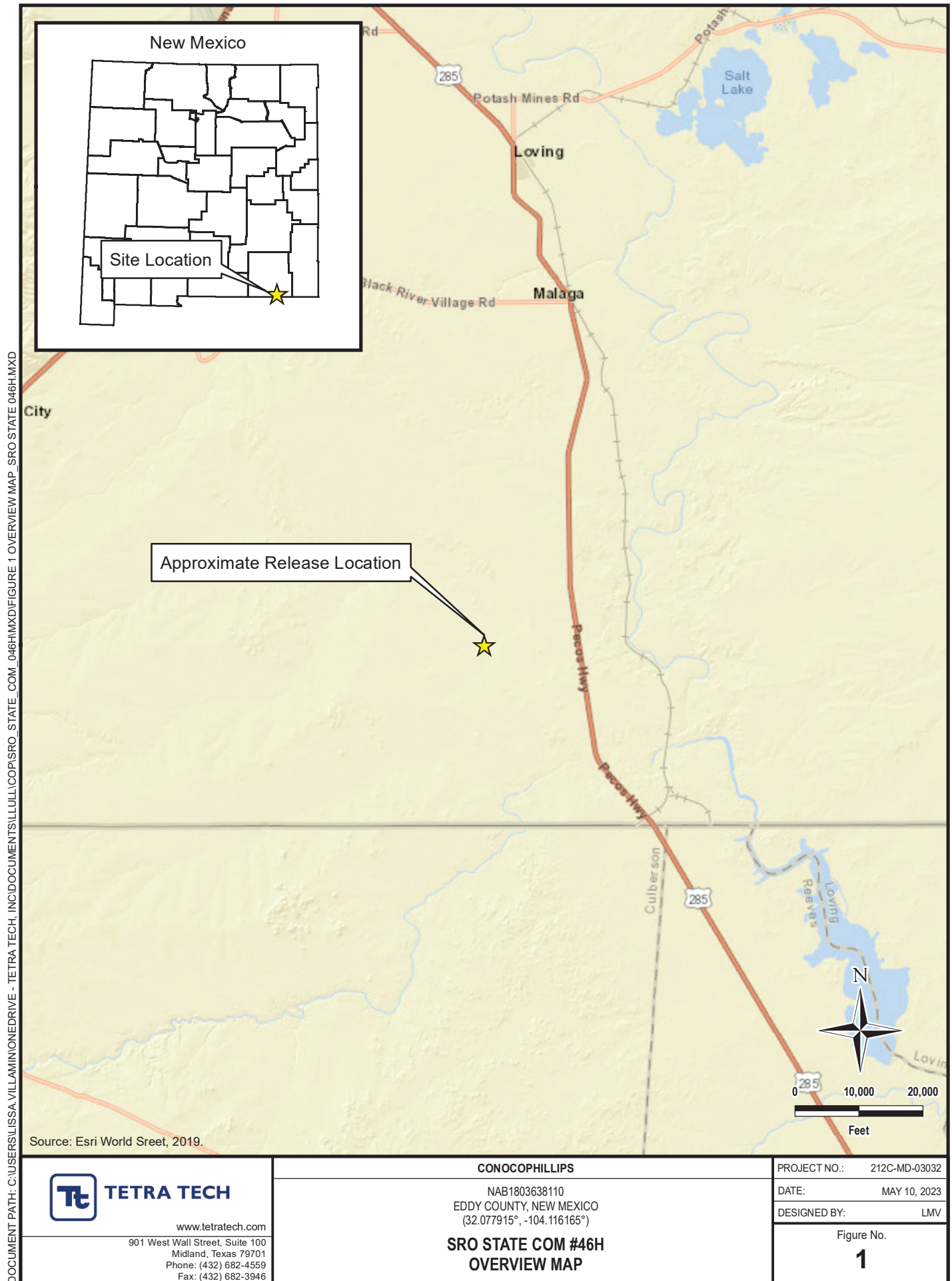
### Tables:

- Table 1 – Summary of Analytical Results – 2018 Soil Assessment
- Table 2 – Summary of Analytical Results – 2023 Soil Assessment
- Table 3 – Summary of Analytical Results – 2023 Soil Remediation

### Appendices:

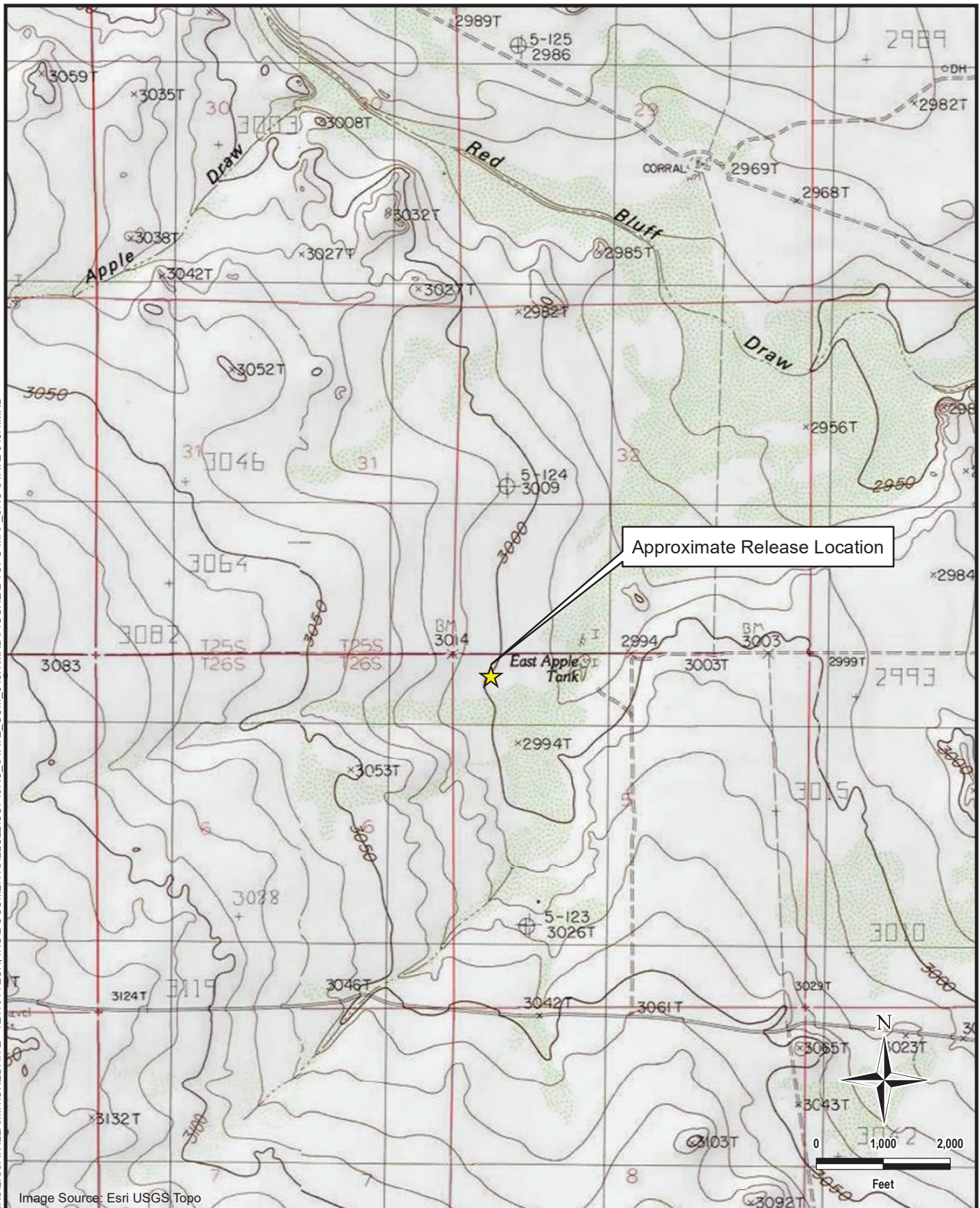
- Appendix A – C-141 Forms
- Appendix B – Site Characterization Data
- Appendix C – Regulatory Correspondence
- Appendix D – Laboratory Analytical Data
- Appendix E – Photographic Documentation
- Appendix F – Waste Manifests

## FIGURES





DOCUMENT PATH: C:\USERS\LISSA.VILLAMONEDRIVE - TETRA TECH\INC\DOCUMENTS\ILLU\COPI\SRO\_STATE\_COM\_046HMX\FIGURE 2 TOPO MAP\_SRO STATE 046H.MXD

**TETRA TECH**

www.tetrattech.com

901 West Wall Street, Suite 100  
Midland, Texas 79701  
Phone: (432) 682-4559  
Fax: (432) 682-3946

**CONOCOPHILLIPS**

NAB1803638110  
EDDY COUNTY, NEW MEXICO  
(32.077915°, -104.116165°)

**SRO STATE COM #46H  
TOPOGRAPHIC MAP**

PROJECT NO.: 212C-MD-03032

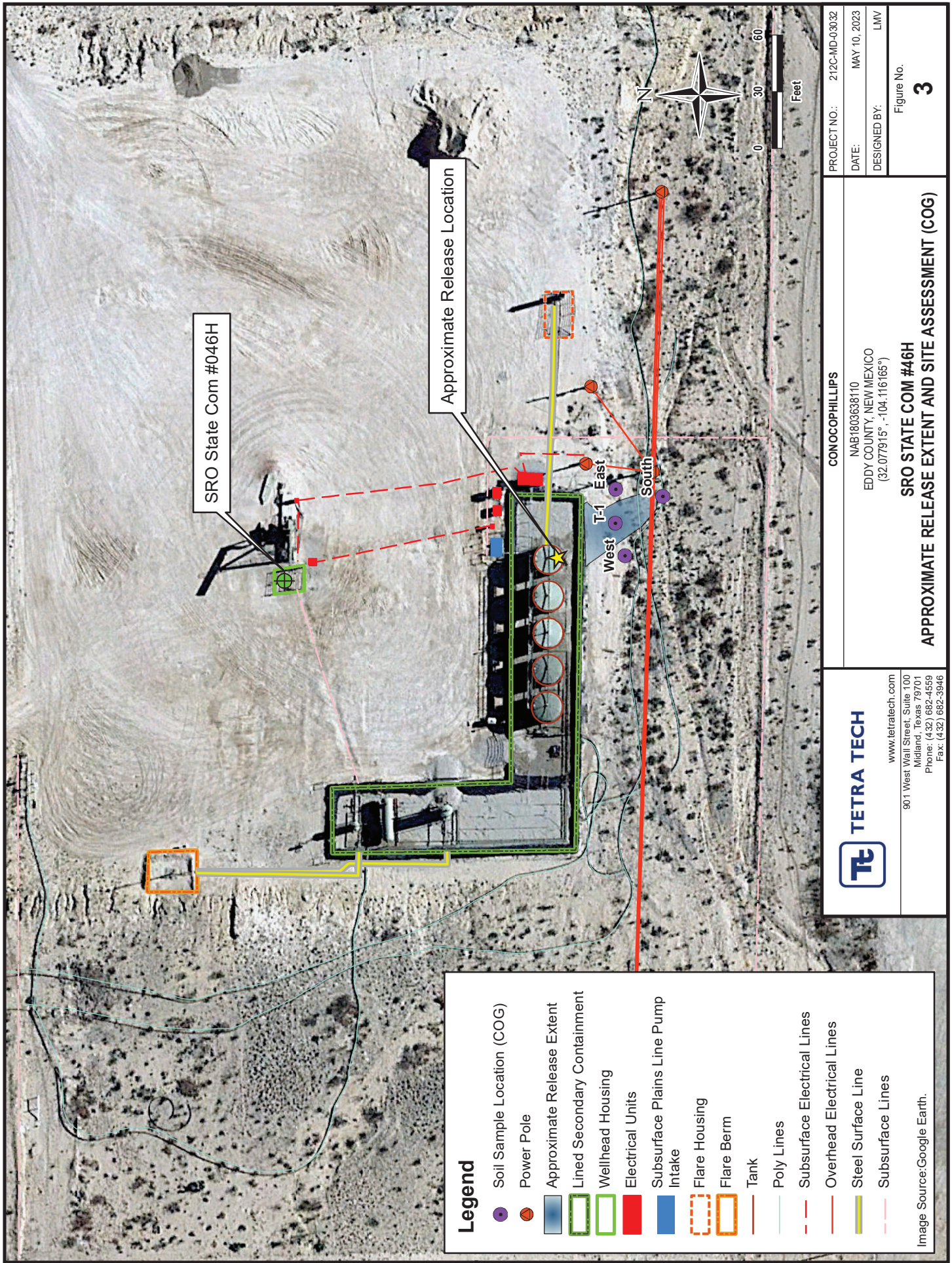
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DESIGNED BY: LMV

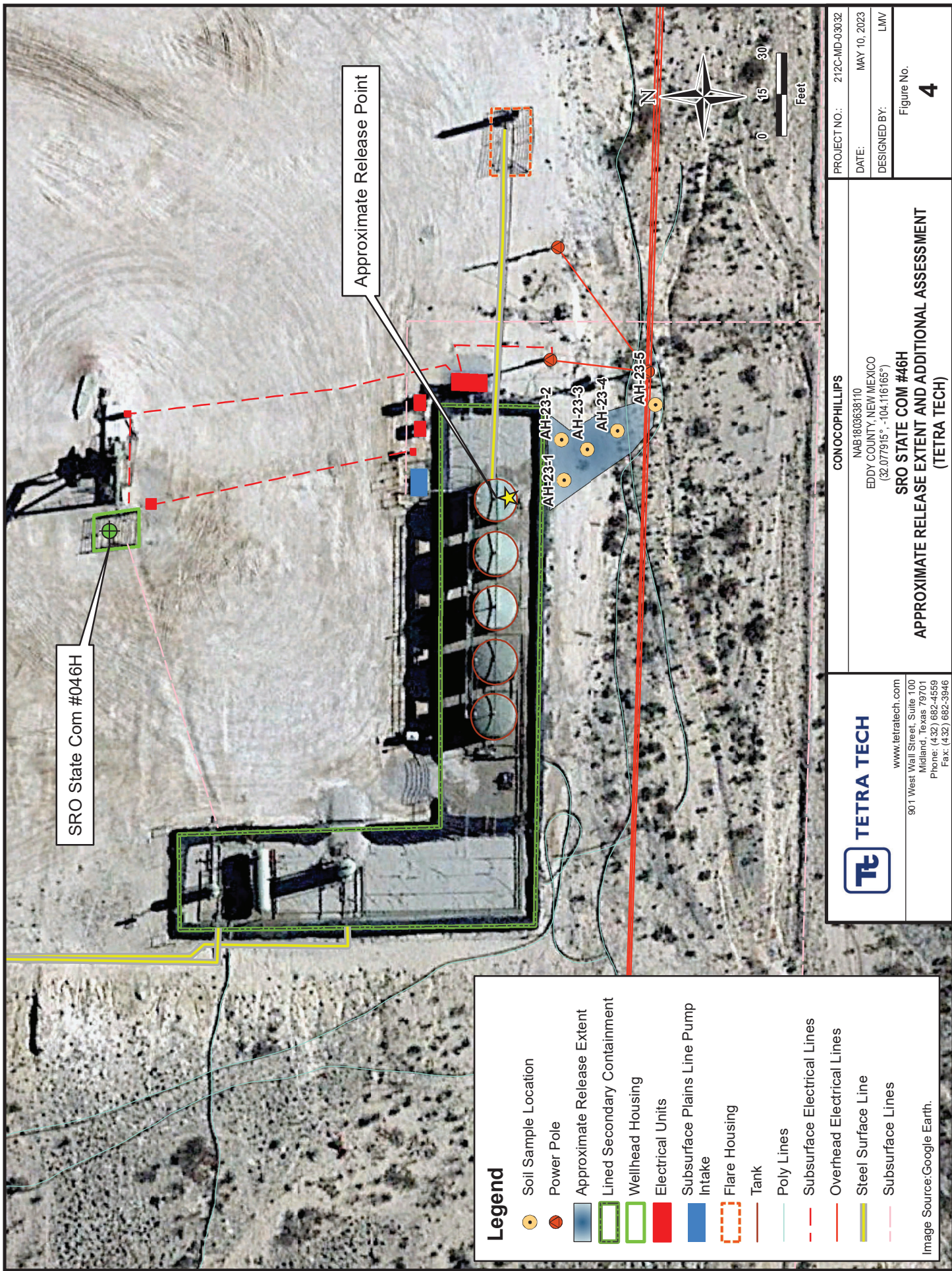
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**2**

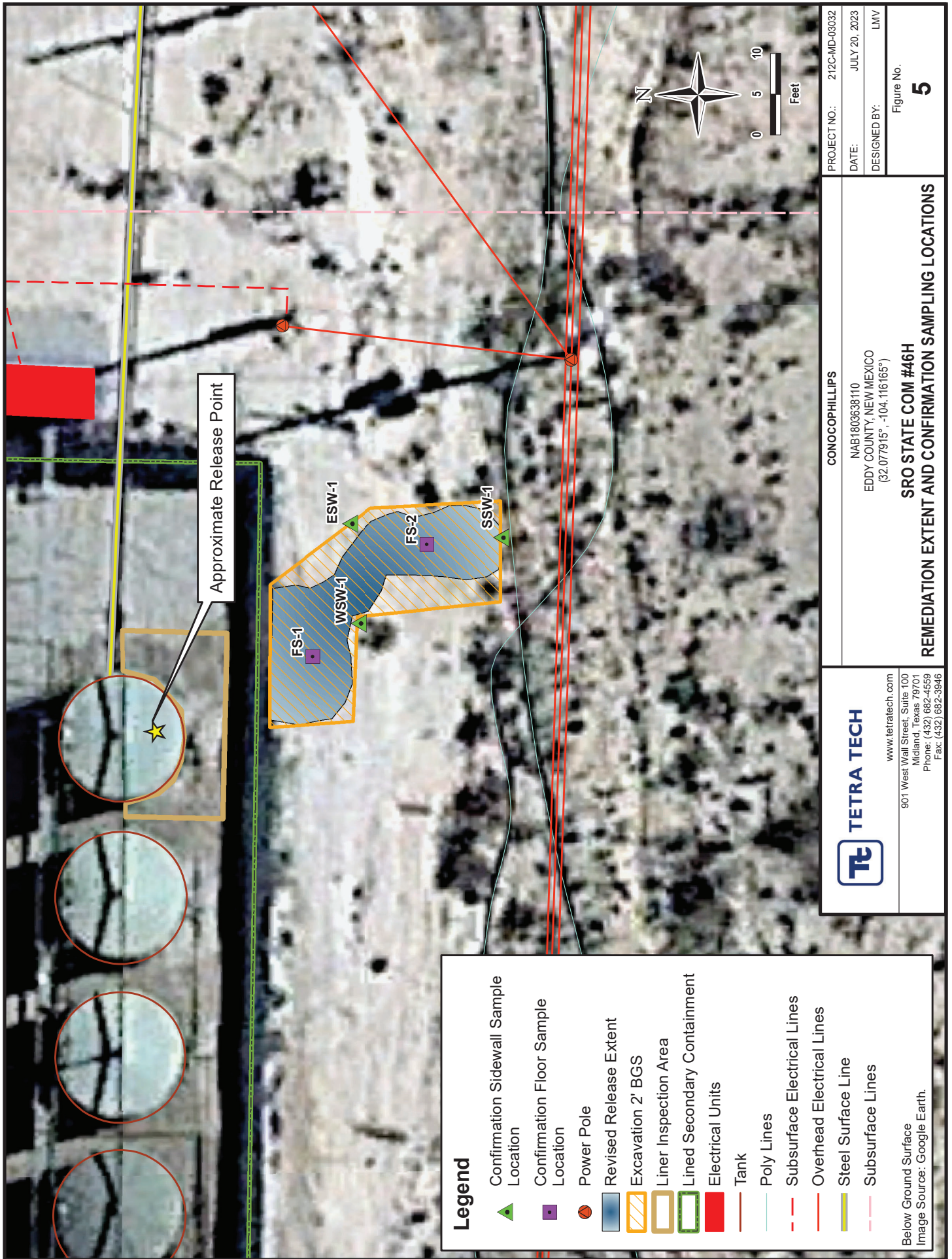












## **TABLES**

TABLE 1  
SUMMARY OF ANALYTICAL RESULTS  
2018 SOIL ASSESSMENT - HAB1803638110  
CONOCOPHILLIPS  
SRO STATE COM #46H  
EDDY COUNTY, NEW MEXICO

Sample ID	Sample Date	Sample Depth ft. bgs	Chloride <sup>1</sup> mg/kg	Benzene			Toluene			Ethylbenzene			m,p-Xylenes			o-Xylene			Total Xylenes			Total BTEX			TPH <sup>3</sup>			Total TPH mg/kg
				mg/kg	Q	Q	mg/kg	Q	Q	mg/kg	Q	Q	mg/kg	Q	Q	mg/kg	Q	Q	mg/kg	Q	Q	mg/kg	Q	Q	mg/kg	Q	Q	
T-1	3/19/20218	Surface	<49.1	<0.00201	0.00254	<0.00201	<0.00201	<0.00201	0.00455	0.00704	0.00958	22.4	1.90	211	1520													
		6"	<24.9	<0.00199	<0.00199	<0.00199	<0.00199	<0.00199	<0.00398	<0.00398	<0.00398	<14.9	433	57.5	491													
		1	<24.9	<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	<0.00399	<0.00399	<0.00399	<15.0	252	29.4	281													
		2	<4.97	<0.00199	<0.00199	<0.00199	<0.00199	<0.00199	<0.00398	<0.00398	<0.00398	<15.0	<15.0	<15.0	<15.0													
South	3/19/20218	Surface	9.78	<0.00202	<0.00202	<0.00202	<0.00202	<0.00202	<0.00403	<0.00403	<0.00202	<0.00202	<0.00202	<0.00202	859	159	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	1020
	2/27/20218	1	<4.99	<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	<0.00401	<0.00401	<0.00200	<0.00200	<0.00200	<0.00200	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0
East	3/19/20218	Surface	7.09	<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	<0.00399	<0.00399	<0.00200	<0.00200	<0.00200	<0.00399	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0
	2/27/20218	1	<4.99	<0.00199	<0.00199	<0.00199	<0.00199	<0.00199	<0.00398	<0.00398	<0.00199	<0.00199	<0.00199	<0.00199	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0
West	3/19/20218	2	<5.00	<0.00199	<0.00199	<0.00199	<0.00199	<0.00199	<0.00398	<0.00398	<0.00199	<0.00199	<0.00199	<0.00199	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0
		Surface	<49.5	<0.00199	<0.00199	<0.00199	<0.00199	<0.00199	<0.00398	<0.00398	<0.00199	<0.00199	<0.00199	<0.00199	<14.9	25.7	<14.9	<14.9	<14.9	<14.9	<14.9	<14.9	<14.9	<14.9	<14.9	<14.9	<14.9	25.7
		6"	<49.5	<0.00202	<0.00202	<0.00202	<0.00202	<0.00202	<0.00403	<0.00403	<0.00202	<0.00202	<0.00202	<0.00401	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0
		1	<49.5	<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	<0.00397	<0.00397	<0.00198	<0.00198	<0.00198	<0.00198	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0
BG	2/17/20218	3	72.7	<0.00198	<0.00198	<0.00198	<0.00198	<0.00198	<0.00397	<0.00397	<0.00198	<0.00198	<0.00198	<0.00198	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0
	2/27/20218	3	55.8	<0.00199	<0.00199	<0.00199	<0.00199	<0.00199	<0.00399	<0.00399	<0.00199	<0.00199	<0.00199	<0.00199	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0	<15.0

NOTES:  
ft. Feet  
bgs Below ground surface  
mg/kg Milligrams per kilogram  
TPH Total Petroleum Hydrocarbons  
GRO Gasoline range organics  
DRO Diesel range organics  
MRO Motor Oil range organics  
NS Sample not analyzed for parameter  
1 EPA Method 300.0  
2 EPA Method 802.1B  
3 Method SW8015 Mod

QUALIFIERS:

TABLE 2  
SUMMARY OF ANALYTICAL RESULTS  
2023 SOIL ASSESSMENT- nAB1803638110  
CONOCOPHILLIPS  
SRO STATE COM #46H  
EDDY COUNTY, NM

Sample ID	Sample Date	Sample Depth ft. bgs	Chloride <sup>1</sup>		BTEX <sup>2</sup>						TPH <sup>3</sup>					Total TPH (GRO+DRO+EXT DRO) mg/kg			
					Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO		DRO		EXT DRO
			mg/kg	Q															
AH-23-1	5/2/2023	0-1	<16.0		<0.050		<0.050		<0.050		<0.150	<0.300	<10.0		221	138		359	
AH-23-2	5/2/2023	0-1	<16.0		<0.050		<0.050		<0.050		<0.150	<0.300	<10.0		24.7	16.2		40.9	
AH-23-3	5/2/2023	0-1	<16.0		<0.050		<0.050		<0.050		<0.150	<0.300	<10.0		34.0	19.2		53.2	
AH-23-4	5/2/2023	0-1	<16.0		<0.050		<0.050		<0.050		<0.150	<0.300	<10.0		53.2	54.9		108.1	
AH-23-5	5/2/2023	0-1	<16.0		<0.050		<0.050		<0.050		<0.150	<0.300	<10.0		<10.0	<10.0		-	

NOTES:  
ft. Feet  
bgs Below ground surface  
mg/kg Milligrams per kilogram  
TPH Total Petroleum Hydrocarbons  
GRO Gasoline range organics  
DRO Diesel range organics  
1 Method SM4500CH  
2 Method 8021B  
3 Method 8015M

QUALIFIERS:

*Bold and italicized values indicate exceedance of proposed Remediation RRAIs and/or Reclamation Requirements.*



TABLE 3  
SUMMARY OF ANALYTICAL RESULTS  
2023 SOIL REMEDIATION - nAB1803638110  
CONOCOPHILLIPS  
SRO STATE COM #46H  
EDDY COUNTY, NM

Sample ID	Sample Date	Sample Depth ft. bgs	Chloride <sup>1</sup>		BTEX <sup>2</sup>						TPH <sup>3</sup>						Total TPH (GRO+DRO+EXT DRO) mg/kg		
					Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO			DRO	
			mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q		mg/kg	Q
FS-1	7/5/2023	2	48.0		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
FS-1	7/5/2023	2	48.0		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
SSW-1	7/5/2023	-	48.0		<0.050		<0.050		<0.150		<0.300		<10.0		53.5	43.8		97.3	
ESW-1	7/5/2023	-	48.0		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-
WSW-1	7/5/2023	-	16.0		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-

NOTES:

- ft. Feet
- bgs Below ground surface
- mg/kg Milligrams per kilogram
- TPH Total Petroleum Hydrocarbons
- GRO Gasoline range organics
- DRO Diesel range organics
- 1 Method SM4500CHB
- 2 Method 8021B
- 3 Method 8015M

## **APPENDIX A C-141 Forms**

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-4600
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party	COG Operating, LLC	OGRID	229137
Contact Name	Robert McNeill	Contact Telephone	(432) 683-7443
Contact email	RMcNeill@concho.com	Incident # (assigned by OCD)	
Contact mailing address	600 West Illinois Avenue, Midland, Texas 79701		

### Location of Release Source

Latitude 32.077915 Longitude -104.116168  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	SRO State Com #046H	Site Type	Tank Battery
Date Release Discovered	February 1, 2018	API# (if applicable)	30-025-39951

Unit Letter	Section	Township	Range	County
D	5	26S	28E	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 checked="" type="checkbox"/> Crude Oil	Volume Released (bbls)	10	Volume Recovered (bbls)	8
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls)	35	Volume Recovered (bbls)	33
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input checked="" 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

Downstream valve on FWKO water dump was left in the wrong position sending excess fluid to the oil tanks resulting in an overflow into the secondary containment. The valve position was corrected. The majority of the fluid remained inside of the line containment. There was some overspray in the pasture adjacent to the location. A vacuum truck was dispatched to remove all freestanding fluids. Concho will evaluate the site to determine if we may commence remediation immediately or delineate any possible impact from the release and we will present a remediation work plan to the NMOCD for approval prior to any significant remediation activities.

Incident ID	
District RP	2RP-4600
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? <b>The spill was greater than 25 barrels of fluid.</b>
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? <b>An email was sent to Crystal Waver (NMOCD) and Tammy Honea (NMSLO) by Rebecca Haskell on February 1, 2018 at 11:58 am.</b>	

### 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: <b>Rebecca Haskell</b>	Title: <b>Senior HSE Coordinator</b>
Signature: <u><i>Rebecca Haskell</i></u>	Date: <b>11/6/2018</b>
email: <b>rhaskell@concho.com</b>	Telephone: <b>(432) 818-2372</b>
<b><u>OCD Only</u></b>  Received by: _____ Date: _____	

Incident ID	
District RP	2RP-4600
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>&lt;50</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 checked="" type="checkbox"/> Yes <input 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.

Incident ID	
District RP	2RP-4600
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: Rebecca Haskell Title: Senior HSE Coordinator  
Signature:  Date: 11/6/18  
email: rhaskell@concho.com Telephone: 432-818-2372

**OCD Only**

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



Incident ID	
District RP	2RP-4600
Facility ID	
Application ID	

## Remediation Plan

**Remediation Plan Checklist:** *Each of the following items must be included in the plan.*

- ☒ Detailed description of proposed remediation technique
- ☒ Scaled sitemap with GPS coordinates showing delineation points
- ☒ Estimated volume of material to be remediated
- ☒ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☒ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

**Deferral Requests Only:** *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- ☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- ☐ Extents of contamination must be fully delineated.
- ☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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

Printed Name: Rebecca Haskell Title: Senior HSE Coordinator  
Signature: Rebecca Haskell Date: 11/6/18  
email: rhaskell@concho.com Telephone: 432-818-2372

**OCD Only**

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

☐ Approved ☒ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: Bryan Hall Date: 12/1/2022

Incident ID	nAB1803638110
District RP	
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: Moises H Cantu Garcia Title: Sr. Environmental Engineer  
Signature: Moises H Cantu Garcia Date: 7/20/2023  
email: Moises.H.CantuGarcia@conocophillips.com Telephone: 432-688-6090

**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: Brittany Hall Date: 7/24/2023

Printed Name: Brittany Hall Title: Environmental Specialist

## **APPENDIX B**

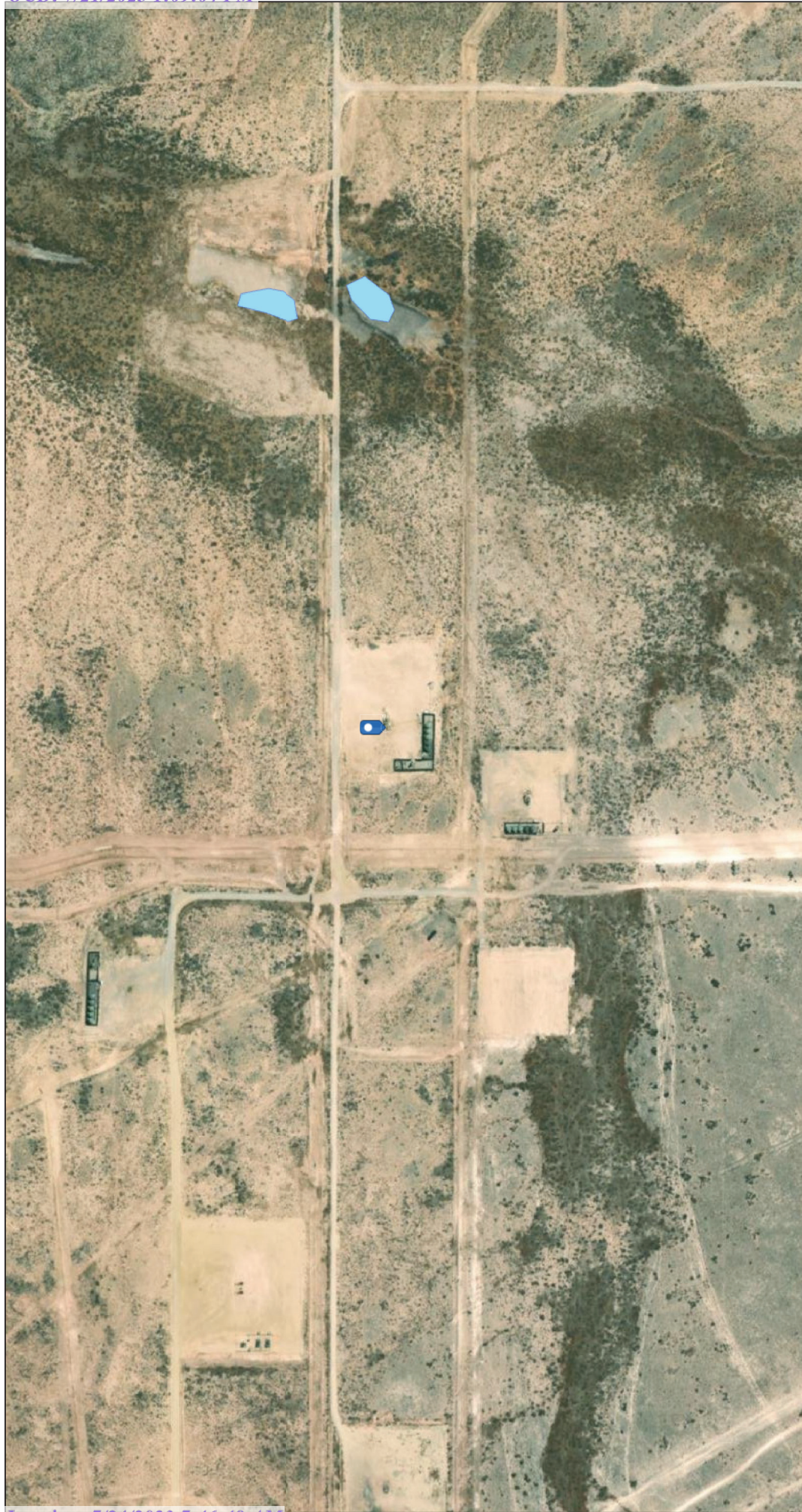
### **Site Characterization Data**

# OCD Potential Karst Locations





# OCD Waterbodies Map



2/24/2023, 3:21:10 PM

OSW Water Bodys

1:4,514

0 0.05 0.1 0.15 0.19 mi  
0 0.07 0.15 0.3 km

Esri, HERE, Garmin, IPC, Maxar, NM OSE



# New Mexico Office of the State Engineer

## Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

(R=POD has been replaced, O=orphaned, C=the file is closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest)

(NAD83 UTM in meters)

(In feet)

POD Number	POD Sub-Code	basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	Distance	Depth Well	Depth Water	Water Column
<a href="#">C 02478</a>	CUB	ED		2	1	05	26S	28E		583848	3549325*	442	100		
<a href="#">C 01278</a>	C	ED		4	3	28	25S	28E		585470	3551338*	2815	205	90	115
<a href="#">C 03836 POD1</a>	C	ED		2	2	4	29	25S	28E	584682	3551934	2821	300	30	270

Average Depth to Water: **60 feet**

Minimum Depth: **30 feet**

Maximum Depth: **90 feet**

Record Count: 3

### UTMNAD83 Radius Search (in meters):

**Easting (X):** 583414.596

**Northing (Y):** 3549413.146

**Radius:** 3200

\*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

7/18/23 2:09 PM

Page 1 of 1

WATER COLUMN/ AVERAGE  
DEPTH TO WATER



## **APPENDIX C**

### **Regulatory Correspondence**

## Bratcher, Mike, EMNRD

---

**From:** Bratcher, Mike, EMNRD  
**Sent:** Tuesday, May 15, 2018 8:12 AM  
**To:** 'DeAnn Grant'; rmann@slo.state.nm.us  
**Cc:** Weaver, Crystal, EMNRD; Sheldon Hitchcock; Dakota Neel; Rebecca Haskell; Robert McNeill  
**Subject:** RE: (C-141 Final) SRO State Com #046 (30-015-41866) 2-5-2018

RE: COG \* SRO St Com 46 \* **2RP-4609** \* DOR: 2/5/18

All,

The Final C-141 and request for closure of the above referenced release is approved.

Thank you,

Mike Bratcher  
NMOCD District 2  
811 South First Street  
Artesia, NM 88210  
575-748-1283 Ext 108

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.

---

**From:** DeAnn Grant <agrant@concho.com>  
**Sent:** Monday, May 14, 2018 10:06 AM  
**To:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; rmann@slo.state.nm.us  
**Cc:** Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Sheldon Hitchcock <SLHitchcock@concho.com>; Dakota Neel <DNeel2@concho.com>; Rebecca Haskell <RHaskell@concho.com>; Robert McNeill <RMcNeill@concho.com>; DeAnn Grant <agrant@concho.com>  
**Subject:** (C-141 Final) SRO State Com #046 (30-015-41866) 2-5-2018

Mr. Bratcher/Mr. Mann,

A final inspection has been conducted regarding the clean-up efforts made at the above mentioned lined facility. Free fluids were removed and if present the impacted gravel was removed from the liner and taken to a NMOCD approved disposal facility. The liner was inspected for damage and found to have liner integrity to contain free fluids. Please see the attached Final C-141 and picture taken during the final inspection conducted by a COG HSE representative.



Thank you,

**DeAnn Grant**

HSE Administrative Assistant

[agrant@concho.com](mailto:agrant@concho.com)

COG Operating LLC#

600 W Illinois Avenue | Midland, TX 79701

Direct: 432-253-4513 | Main: 432.683.7443



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**From:** [OCDOnline@state.nm.us](mailto:OCDOnline@state.nm.us)  
**To:** [Beauvais, Charles R](#)  
**Subject:** [EXTERNAL]The Oil Conservation Division (OCD) has approved the application, Application ID: 162717  
**Date:** Thursday, December 1, 2022 9:37:27 AM

---

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern (c/o Charles Beauvais for COG OPERATING LLC),

The OCD has approved the submitted *Internal Manual Incident File Supporting Documentation (ENV)* (IM-BNF), for incident ID (n#) nAB1803638110, with the following conditions:

- **Perform liner inspection to ensure integrity of liner. Include pictures of liner inspection in final report.**
- **Remediation and closure must comply with 19.15.29.12 and 19.15.29.13 NMAC.**
- **2RP-4600 closed. Please reference incident #NAB1803638110 in all future communication.**
- **Submit a complete report through the OCD Permitting website by 3/3/2023.**

The signed IM-BNF can be found in the OCD Online: Imaging under the incident ID (n#).

If you have any questions regarding this application, please contact me.

Thank you,  
Brittany Hall  
Projects Environmental Specialist - A  
505-517-5333  
[Brittany.Hall@emnrd.nm.gov](mailto:Brittany.Hall@emnrd.nm.gov)

**New Mexico Energy, Minerals and Natural Resources Department**  
1220 South St. Francis Drive  
Santa Fe, NM 87505

**Chavira, Lisbeth**

---

**From:** Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>  
**Sent:** Friday, March 3, 2023 2:05 PM  
**To:** Abbott, Sam  
**Cc:** Beauvais, Charles R; Llull, Christian; Chavira, Lisbeth  
**Subject:** RE: [EXTERNAL] Extension Request - Application ID 162717 (nAB1803638110)

**⚠ CAUTION:** This email originated from an external sender. Verify the source before opening links or attachments. **⚠**

Sam,  
Your extension request for **nAB1803638110** is approved. The new due date is June 3, 2023.

Please include a copy of this and all notifications in the remedial and/or closure reports to ensure the notifications are documented in the project file.

Thank you,

**Brittany Hall** • Environmental Specialist  
Environmental Bureau Projects Group  
EMNRD - Oil Conservation Division  
1000 Rio Brazos Road | Aztec, NM 87110  
505.517.5333 | [Brittany.Hall@emnrd.nm.gov](mailto:Brittany.Hall@emnrd.nm.gov)  
<http://www.emnrd.nm.gov/ocd/>

---

**From:** Abbott, Sam <Sam.Abbott@tetrattech.com>  
**Sent:** Friday, March 3, 2023 11:59 AM  
**To:** Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>  
**Cc:** Beauvais, Charles R <Charles.R.Beauvais@conocophillips.com>; Llull, Christian <Christian.Llull@tetrattech.com>; Chavira, Lisbeth <LISBETH.CHAVIRA@tetrattech.com>  
**Subject:** [EXTERNAL] Extension Request - Application ID 162717 (nAB1803638110)

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Ms. Hall:

On behalf of ConocoPhillips, Tetra Tech is requesting a 90-day extension (until June 3, 2023) to complete the liner inspection, remedial action, and associated closure reporting for the SRO State Com #046H Release site (**nAB1803638110**).

ConocoPhillips recently received a large volume of NMOCD determinations related to unresolved releases from ConocoPhillips' predecessor-in-interest ("COG") via the *Internal Manual Incident File Supporting Documentation (ENV)* (IM-BNF) process.

Given the difficulties inherent with available resource allocation for several projects with similar deadlines within a short period of time, this schedule is not currently practical.

ConocoPhillips plans to conduct remediation in the coming month however, and once the confirmation sampling data is collected, tabulated, and evaluated, a closure report will be submitted to the OCD.

Please let me know if you have any questions or concerns.

Sam

**Samantha Abbott, PG** | Project Manager

Direct Mobile +1 (512) 739-7874 | Business +1 (512) 338-1667 | [Sam.Abbott@tetrattech.com](mailto:Sam.Abbott@tetrattech.com)

**Tetra Tech, Inc.** | *Leading with Science®* | OGA

8911 N Capital of Texas Hwy #2310 | Austin, TX 78759 | [tetrattech.com](http://tetrattech.com)

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**TETRA TECH**

**Poole, Nicholas**

---

**From:** Buchanan, Michael, EMNRD <Michael.Buchanan@emnrd.nm.gov>  
**Sent:** Friday, June 30, 2023 11:43 AM  
**To:** Poole, Nicholas; Enviro, OCD, EMNRD  
**Cc:** Hall, Brittany, EMNRD  
**Subject:** RE: [EXTERNAL] Incident ID: nAB1803638110,- Confirmation Sampling

You don't often get email from michael.buchanan@emnrd.nm.gov. [Learn why this is important](#)

**⚠ CAUTION:** This email originated from an external sender. Verify the source before opening links or attachments. **⚠**

Received.

Thank you for the notification. Please include a copy of this and all notifications in the remedial and/or closure reports to ensure the notifications are documented in the project file.

**Mike Buchanan** • Environmental Specialist  
Environmental Bureau  
EMNRD - Oil Conservation Division  
8801 Horizon Blvd. NE | Albuquerque, NM 87113  
| [michael.buchanan@emnrd.nm.gov](mailto:michael.buchanan@emnrd.nm.gov)  
<http://www.emnrd.nm.gov/ocd>



---

**From:** Poole, Nicholas <NICHOLAS.POOLE@tetrattech.com>  
**Sent:** Thursday, June 29, 2023 2:54 PM  
**To:** Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>  
**Cc:** Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>  
**Subject:** [EXTERNAL] Incident ID: nAB1803638110,- Confirmation Sampling

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

Incident ID (n#) **nAB1803638110** (SRO State Com #46H)

To whom it may concern,

In accordance with Subsection D of 19.15.29.12 NMAC, the responsible party must verbally notify the appropriate division district office prior to conducting confirmation sampling.

Remediation activities of the release will begin Wednesday, July 5, 2023.

Thus, on behalf of ConocoPhillips for the above referenced incident, Tetra Tech is duly providing this communication which serves as notification that final confirmation sampling will be conducted at this site **Thursday, July 6 through Thursday, July 11, 2023.**



**NOTE:** If you have any questions regarding this sampling schedule, please contact me.

**Nicholas Poole** | Staff Geoscientist  
Mobile +1 (512) 560-9064 | [nicholas.poole@tetrattech.com](mailto:nicholas.poole@tetrattech.com)

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8911 N. Capital of Texas Highway | Bldg. 2, Suite 2310 | Austin, TX 78759 | [tetrattech.com](http://tetrattech.com)

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## **APPENDIX D**

### **Laboratory Analytical Data**



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

---

May 05, 2023

SAM ABBOTT

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: SRO STATE COM #46H

Enclosed are the results of analyses for samples received by the laboratory on 05/02/23 12:56.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-22-15. 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:**

TETRA TECH  
 SAM ABBOTT  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	05/02/2023	Sampling Date:	05/02/2023
Reported:	05/05/2023	Sampling Type:	Soil
Project Name:	SRO STATE COM #46H	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03032	Sample Received By:	Shalyn Rodriguez
Project Location:	EDDY CO NM		

**Sample ID: AH-23-1 (0-1') (H232139-01)**

BTEX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	05/04/2023	ND	1.89	94.7	2.00	4.24		
Toluene*	<0.050	0.050	05/04/2023	ND	1.91	95.3	2.00	4.31		
Ethylbenzene*	<0.050	0.050	05/04/2023	ND	1.89	94.3	2.00	4.99		
Total Xylenes*	<0.150	0.150	05/04/2023	ND	5.83	97.2	6.00	6.14		
Total BTEX	<0.300	0.300	05/04/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 100 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	05/04/2023	ND	400	100	400	3.92		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/03/2023	ND	193	96.4	200	2.03	
DRO >C10-C28*	221	10.0	05/03/2023	ND	186	92.8	200	4.50	
EXT DRO >C28-C36	138	10.0	05/03/2023	ND					

Surrogate: 1-Chlorooctane 84.5 % 48.2-134

Surrogate: 1-Chlorooctadecane 96.4 % 49.1-148

Cardinal Laboratories

\*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

TETRA TECH  
 SAM ABBOTT  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	05/02/2023	Sampling Date:	05/02/2023
Reported:	05/05/2023	Sampling Type:	Soil
Project Name:	SRO STATE COM #46H	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03032	Sample Received By:	Shalyn Rodriguez
Project Location:	EDDY CO NM		

**Sample ID: AH-23-2 (0-1') (H232139-02)**

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/04/2023	ND	1.89	94.7	2.00	4.24	
Toluene*	<0.050	0.050	05/04/2023	ND	1.91	95.3	2.00	4.31	
Ethylbenzene*	<0.050	0.050	05/04/2023	ND	1.89	94.3	2.00	4.99	
Total Xylenes*	<0.150	0.150	05/04/2023	ND	5.83	97.2	6.00	6.14	
Total BTEX	<0.300	0.300	05/04/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 99.9 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	05/04/2023	ND	400	100	400	3.92		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/03/2023	ND	193	96.4	200	2.03	
DRO >C10-C28*	24.7	10.0	05/03/2023	ND	186	92.8	200	4.50	
EXT DRO >C28-C36	16.2	10.0	05/03/2023	ND					

Surrogate: 1-Chlorooctane 73.5 % 48.2-134

Surrogate: 1-Chlorooctadecane 83.4 % 49.1-148

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager





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

**Analytical Results For:**

TETRA TECH  
 SAM ABBOTT  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	05/02/2023	Sampling Date:	05/02/2023
Reported:	05/05/2023	Sampling Type:	Soil
Project Name:	SRO STATE COM #46H	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03032	Sample Received By:	Shalyn Rodriguez
Project Location:	EDDY CO NM		

**Sample ID: AH-23-3 (0-1') (H232139-03)**

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	05/04/2023	ND	1.89	94.7	2.00	4.24		
Toluene*	<0.050	0.050	05/04/2023	ND	1.91	95.3	2.00	4.31		
Ethylbenzene*	<0.050	0.050	05/04/2023	ND	1.89	94.3	2.00	4.99		
Total Xylenes*	<0.150	0.150	05/04/2023	ND	5.83	97.2	6.00	6.14		
Total BTEX	<0.300	0.300	05/04/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 98.8 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	05/04/2023	ND	400	100	400	3.92		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/03/2023	ND	193	96.4	200	2.03	
DRO >C10-C28*	34.0	10.0	05/03/2023	ND	186	92.8	200	4.50	
EXT DRO >C28-C36	19.2	10.0	05/03/2023	ND					

Surrogate: 1-Chlorooctane 78.2 % 48.2-134

Surrogate: 1-Chlorooctadecane 86.6 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

TETRA TECH  
 SAM ABBOTT  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	05/02/2023	Sampling Date:	05/02/2023
Reported:	05/05/2023	Sampling Type:	Soil
Project Name:	SRO STATE COM #46H	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03032	Sample Received By:	Shalyn Rodriguez
Project Location:	EDDY CO NM		

**Sample ID: AH-23-4 (0-1') (H232139-04)**

BTEX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	05/04/2023	ND	1.89	94.7	2.00	4.24		
Toluene*	<0.050	0.050	05/04/2023	ND	1.91	95.3	2.00	4.31		
Ethylbenzene*	<0.050	0.050	05/04/2023	ND	1.89	94.3	2.00	4.99		
Total Xylenes*	<0.150	0.150	05/04/2023	ND	5.83	97.2	6.00	6.14		
Total BTEX	<0.300	0.300	05/04/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 99.8 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	05/04/2023	ND	400	100	400	3.92		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/03/2023	ND	193	96.4	200	2.03	
DRO >C10-C28*	53.2	10.0	05/03/2023	ND	186	92.8	200	4.50	
EXT DRO >C28-C36	54.9	10.0	05/03/2023	ND					

Surrogate: 1-Chlorooctane 75.0 % 48.2-134

Surrogate: 1-Chlorooctadecane 84.8 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

TETRA TECH  
 SAM ABBOTT  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	05/02/2023	Sampling Date:	05/02/2023
Reported:	05/05/2023	Sampling Type:	Soil
Project Name:	SRO STATE COM #46H	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03032	Sample Received By:	Shalyn Rodriguez
Project Location:	EDDY CO NM		

**Sample ID: AH-23-5 (0-1') (H232139-05)**

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	05/04/2023	ND	1.89	94.7	2.00	4.24		
Toluene*	<0.050	0.050	05/04/2023	ND	1.91	95.3	2.00	4.31		
Ethylbenzene*	<0.050	0.050	05/04/2023	ND	1.89	94.3	2.00	4.99		
Total Xylenes*	<0.150	0.150	05/04/2023	ND	5.83	97.2	6.00	6.14		
Total BTEX	<0.300	0.300	05/04/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 100 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	05/04/2023	ND	400	100	400	3.92		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/03/2023	ND	193	96.4	200	2.03	
DRO >C10-C28*	<10.0	10.0	05/03/2023	ND	186	92.8	200	4.50	
EXT DRO >C28-C36	<10.0	10.0	05/03/2023	ND					

Surrogate: 1-Chlorooctane 72.8 % 48.2-134

Surrogate: 1-Chlorooctadecane 81.4 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager

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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".

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Celey D. Keene, Lab Director/Quality Manager





Page 8 of 8



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July 06, 2023

SAM ABBOTT

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: SRO STATE COM #46H

Enclosed are the results of analyses for samples received by the laboratory on 07/05/23 15:35.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-22-15. 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 style with a large, stylized 'C' and 'K'.

Celey D. Keene

Lab Director/Quality Manager



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

**Analytical Results For:**

TETRA TECH  
 SAM ABBOTT  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	07/05/2023	Sampling Date:	07/05/2023
Reported:	07/06/2023	Sampling Type:	Soil
Project Name:	SRO STATE COM #46H	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03032	Sample Received By:	Tamara Oldaker
Project Location:	EDDY CO NM		

**Sample ID: FS - 1 (H233417-01)**

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	07/05/2023	ND	2.04	102	2.00	0.485	
Toluene*	<0.050	0.050	07/05/2023	ND	2.03	101	2.00	1.13	
Ethylbenzene*	<0.050	0.050	07/05/2023	ND	1.98	99.0	2.00	0.543	
Total Xylenes*	<0.150	0.150	07/05/2023	ND	6.00	100	6.00	0.0909	
Total BTX	<0.300	0.300	07/05/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 105 % 71.5-134

Chloride, SM4500Cl-B			mg/kg		Analyzed By: AC				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	07/06/2023	ND	400	100	400	3.92	

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	07/06/2023	ND	184	92.0	200	4.28	
DRO >C10-C28*	<10.0	10.0	07/06/2023	ND	185	92.4	200	1.74	
EXT DRO >C28-C36	<10.0	10.0	07/06/2023	ND					

Surrogate: 1-Chlorooctane 105 % 48.2-134

Surrogate: 1-Chlorooctadecane 114 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

TETRA TECH  
 SAM ABBOTT  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received: 07/05/2023  
 Reported: 07/06/2023  
 Project Name: SRO STATE COM #46H  
 Project Number: 212C - MD - 03032  
 Project Location: EDDY CO NM

Sampling Date: 07/05/2023  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: FS - 2 (H233417-02)**

BTEx 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	07/05/2023	ND	2.04	102	2.00	0.485		
Toluene*	<0.050	0.050	07/05/2023	ND	2.03	101	2.00	1.13		
Ethylbenzene*	<0.050	0.050	07/05/2023	ND	1.98	99.0	2.00	0.543		
Total Xylenes*	<0.150	0.150	07/05/2023	ND	6.00	100	6.00	0.0909		
Total BTEx	<0.300	0.300	07/05/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 105 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	48.0	16.0	07/06/2023	ND	400	100	400	3.92		

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	07/05/2023	ND	200	100	200	2.65	
DRO >C10-C28*	<10.0	10.0	07/05/2023	ND	207	103	200	2.79	
EXT DRO >C28-C36	<10.0	10.0	07/05/2023	ND					

Surrogate: 1-Chlorooctane 92.6 % 48.2-134

Surrogate: 1-Chlorooctadecane 99.8 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager





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**Analytical Results For:**

TETRA TECH  
 SAM ABBOTT  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	07/05/2023	Sampling Date:	07/05/2023
Reported:	07/06/2023	Sampling Type:	Soil
Project Name:	SRO STATE COM #46H	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03032	Sample Received By:	Tamara Oldaker
Project Location:	EDDY CO NM		

**Sample ID: SSW - 1 (H233417-03)**

BTEx 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	07/05/2023	ND	2.04	102	2.00	0.485		
Toluene*	<0.050	0.050	07/05/2023	ND	2.03	101	2.00	1.13		
Ethylbenzene*	<0.050	0.050	07/05/2023	ND	1.98	99.0	2.00	0.543		
Total Xylenes*	<0.150	0.150	07/05/2023	ND	6.00	100	6.00	0.0909		
Total BTEx	<0.300	0.300	07/05/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 104 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	48.0	16.0	07/06/2023	ND	432	108	400	3.64		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	07/05/2023	ND	200	100	200	2.65	
DRO >C10-C28*	53.5	10.0	07/05/2023	ND	207	103	200	2.79	
EXT DRO >C28-C36	43.8	10.0	07/05/2023	ND					

Surrogate: 1-Chlorooctane 85.8 % 48.2-134

Surrogate: 1-Chlorooctadecane 95.0 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

TETRA TECH  
 SAM ABBOTT  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received: 07/05/2023  
 Reported: 07/06/2023  
 Project Name: SRO STATE COM #46H  
 Project Number: 212C - MD - 03032  
 Project Location: EDDY CO NM

Sampling Date: 07/05/2023  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: ESW - 1 (H233417-04)**

BTEx 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	07/05/2023	ND	2.04	102	2.00	0.485		
Toluene*	<0.050	0.050	07/05/2023	ND	2.03	101	2.00	1.13		
Ethylbenzene*	<0.050	0.050	07/05/2023	ND	1.98	99.0	2.00	0.543		
Total Xylenes*	<0.150	0.150	07/05/2023	ND	6.00	100	6.00	0.0909		
Total BTEx	<0.300	0.300	07/05/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 105 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	48.0	16.0	07/06/2023	ND	432	108	400	3.64		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	07/05/2023	ND	200	100	200	2.65	
DRO >C10-C28*	<10.0	10.0	07/05/2023	ND	207	103	200	2.79	
EXT DRO >C28-C36	<10.0	10.0	07/05/2023	ND					

Surrogate: 1-Chlorooctane 102 % 48.2-134

Surrogate: 1-Chlorooctadecane 112 % 49.1-148

Cardinal Laboratories

\*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

TETRA TECH  
 SAM ABBOTT  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received: 07/05/2023  
 Reported: 07/06/2023  
 Project Name: SRO STATE COM #46H  
 Project Number: 212C - MD - 03032  
 Project Location: EDDY CO NM

Sampling Date: 07/05/2023  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: WSW - 1 (H233417-05)**

BTEX 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	07/05/2023	ND	2.04	102	2.00	0.485		
Toluene*	<0.050	0.050	07/05/2023	ND	2.03	101	2.00	1.13		
Ethylbenzene*	<0.050	0.050	07/05/2023	ND	1.98	99.0	2.00	0.543		
Total Xylenes*	<0.150	0.150	07/05/2023	ND	6.00	100	6.00	0.0909		
Total BTEX	<0.300	0.300	07/05/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 105 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	16.0	16.0	07/06/2023	ND	432	108	400	3.64		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	07/05/2023	ND	200	100	200	2.65	
DRO >C10-C28*	<10.0	10.0	07/05/2023	ND	207	103	200	2.79	
EXT DRO >C28-C36	<10.0	10.0	07/05/2023	ND					

Surrogate: 1-Chlorooctane 77.2 % 48.2-134

Surrogate: 1-Chlorooctadecane 83.4 % 49.1-148

Cardinal Laboratories

\*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene, Lab Director/Quality Manager



---

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

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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

---

Cardinal Laboratories

\*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

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

---

Celey D. Keene, Lab Director/Quality Manager





ANALYSIS REQUEST

† Cardinal cannot accept verbal changes. Please email changes to [celey.keene@cardinallabsnm.com](mailto:celey.keene@cardinallabsnm.com)

## **APPENDIX E**

# **Photographic Documentation**



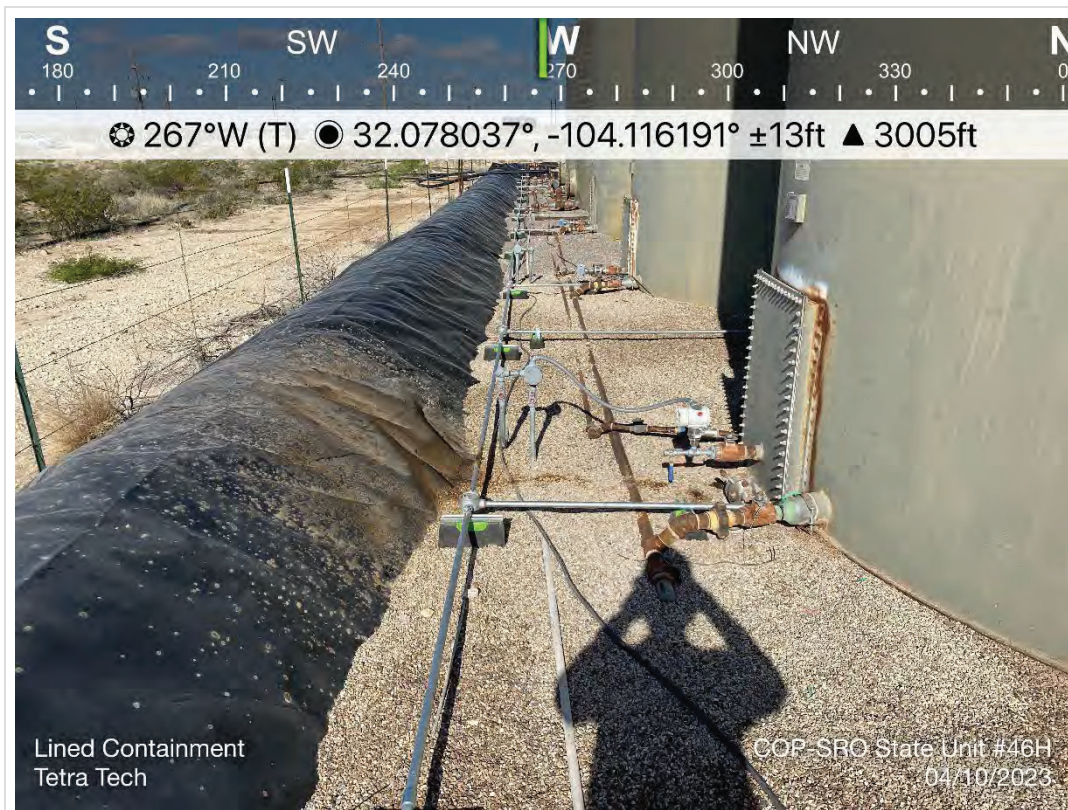


TETRA TECH, INC. PROJECT NO. 212C-MD-03032	DESCRIPTION	View south of Site signage.	1
	SITE NAME	SRO State Com #46H	4/10/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03032	DESCRIPTION	View northwest. View of tank batteries inside containment liner. Staining shown around tank batteries.	2
	SITE NAME	SRO State Com #46H	4/10/2023



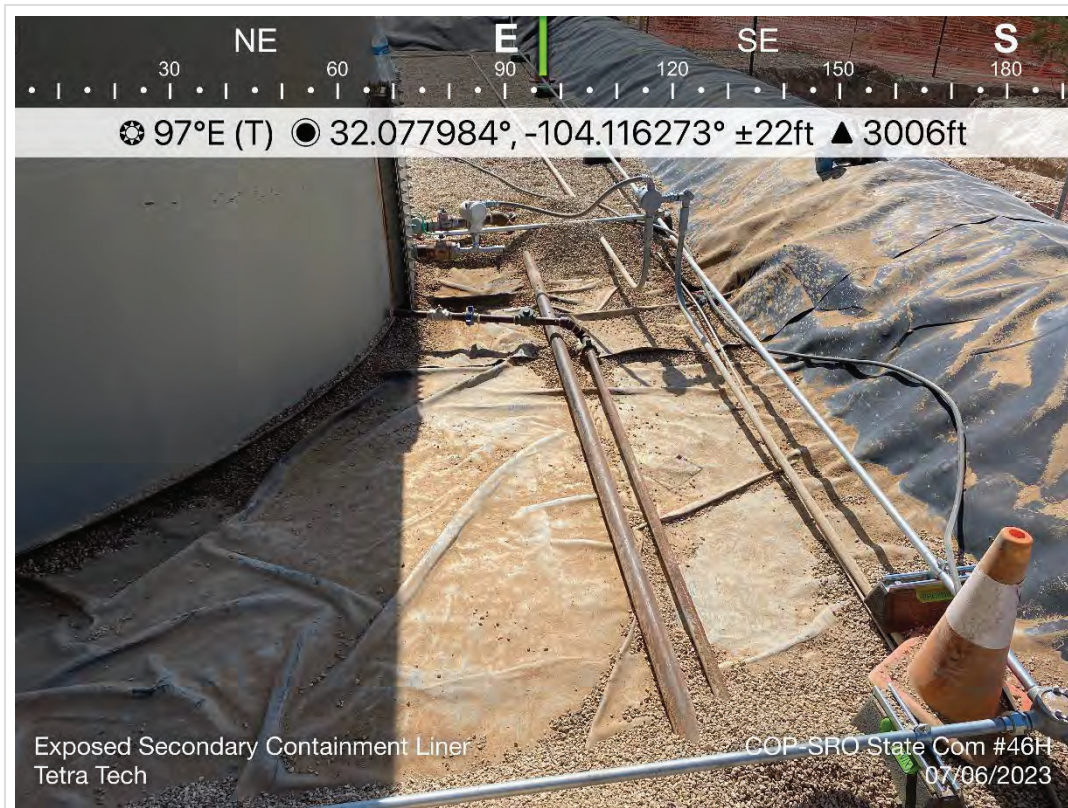


TETRA TECH, INC. PROJECT NO. 212C-MD-03032	DESCRIPTION	View west. View of tank batteries and surface lines inside lined containment. View of approximate release location	3
	SITE NAME	SRO State Com #46H	4/10/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03032	DESCRIPTION	View southeast View of exposed liner in the approximate release area. Liner integrity intact.	4
	SITE NAME	SRO State Com #46H	4/10/2023





TETRA TECH, INC. PROJECT NO. 212C-MD-03032	DESCRIPTION	View east. View of exposed liner in the approximate release point. Steel surface lines present.	5
	SITE NAME	SRO State Com #46H	7/6/2023

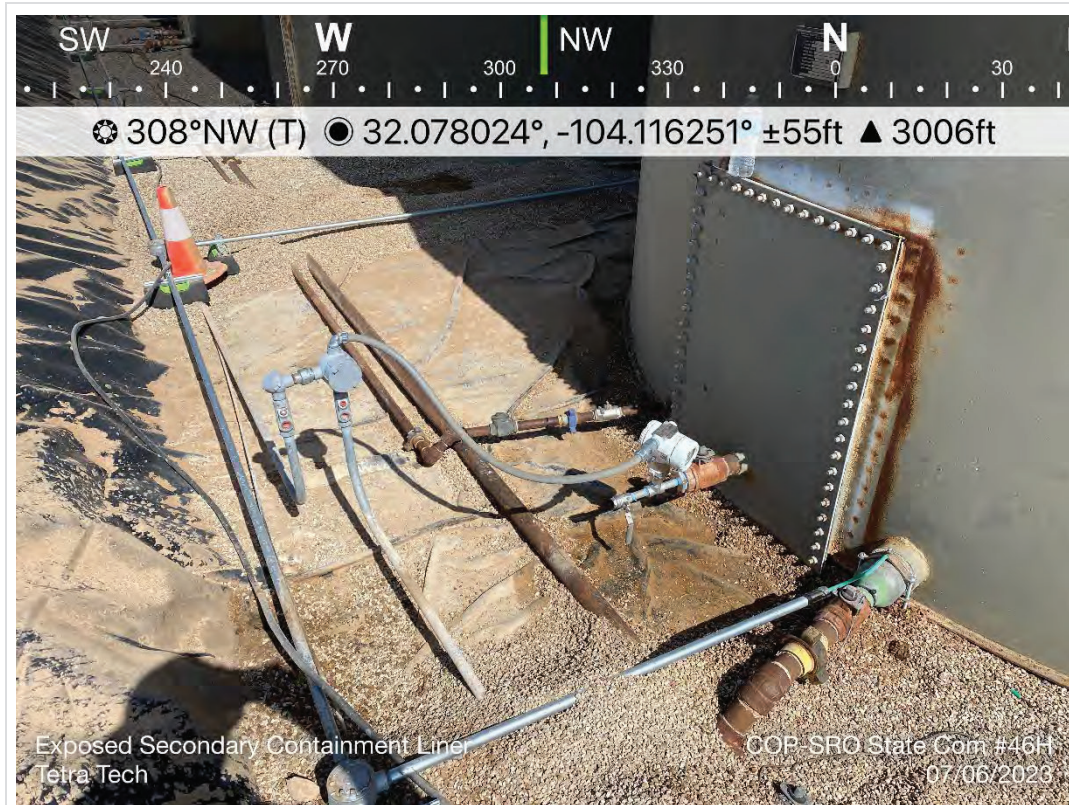


TETRA TECH, INC. PROJECT NO. 212C-MD-03032	DESCRIPTION	View south. View of exposed liner in the approximate release point. Liner integrity intact.	6
	SITE NAME	SRO State Com #46H	7/6/2023





TETRA TECH, INC. PROJECT NO. 212C-MD-03032	DESCRIPTION	View southeast. View of exposed liner in the approximate release area. Liner integrity intact.	7
	SITE NAME	SRO State Com #46H	7/6/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03032	DESCRIPTION	View northwest. View of exposed liner in the approximate release area. Liner integrity intact.	8
	SITE NAME	SRO State Com #46H	7/6/2023



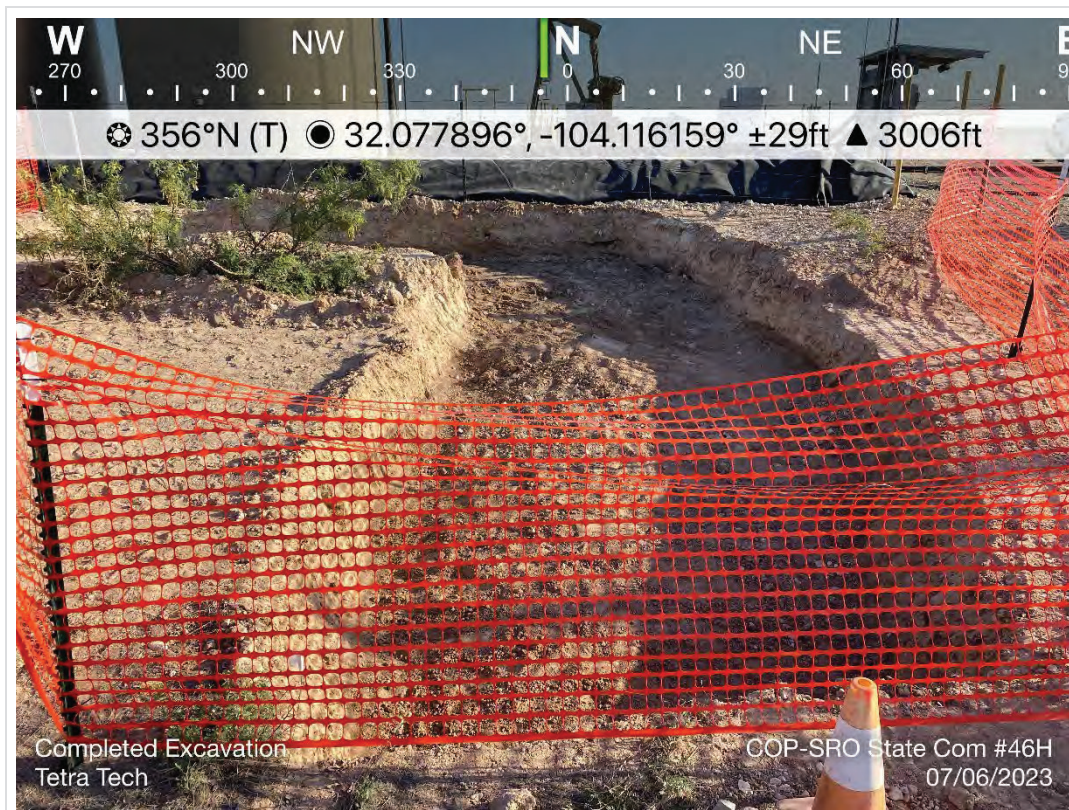


TETRA TECH, INC. PROJECT NO. 212C-MD-03032	DESCRIPTION	View north. View of approximate release extent outside lined containment.	9
	SITE NAME	SRO State Com #46H	4/10/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03032	DESCRIPTION	View southeast. View of excavation in the release extent outside lined containment.	10
	SITE NAME	SRO State Com #46H	7/6/2023



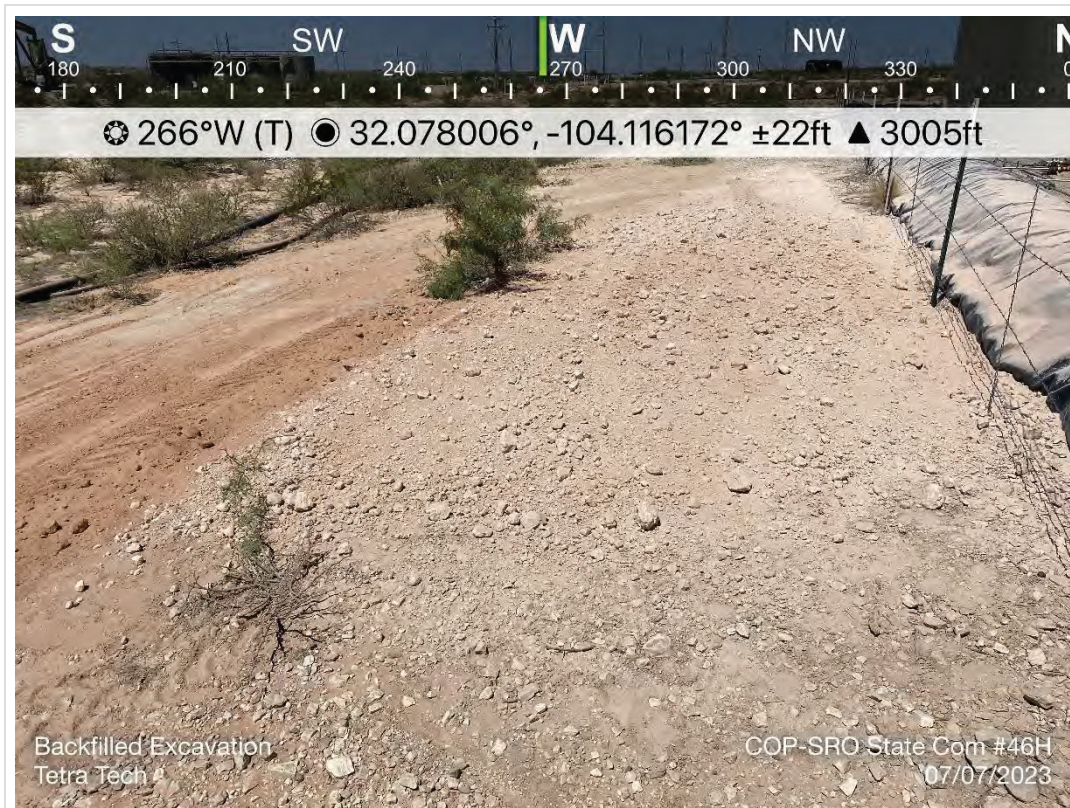


TETRA TECH, INC. PROJECT NO. 212C-MD-03032	DESCRIPTION	View north. View of excavation in the release extent outside lined containment.	11
	SITE NAME	SRO State Com #46H	7/6/2023

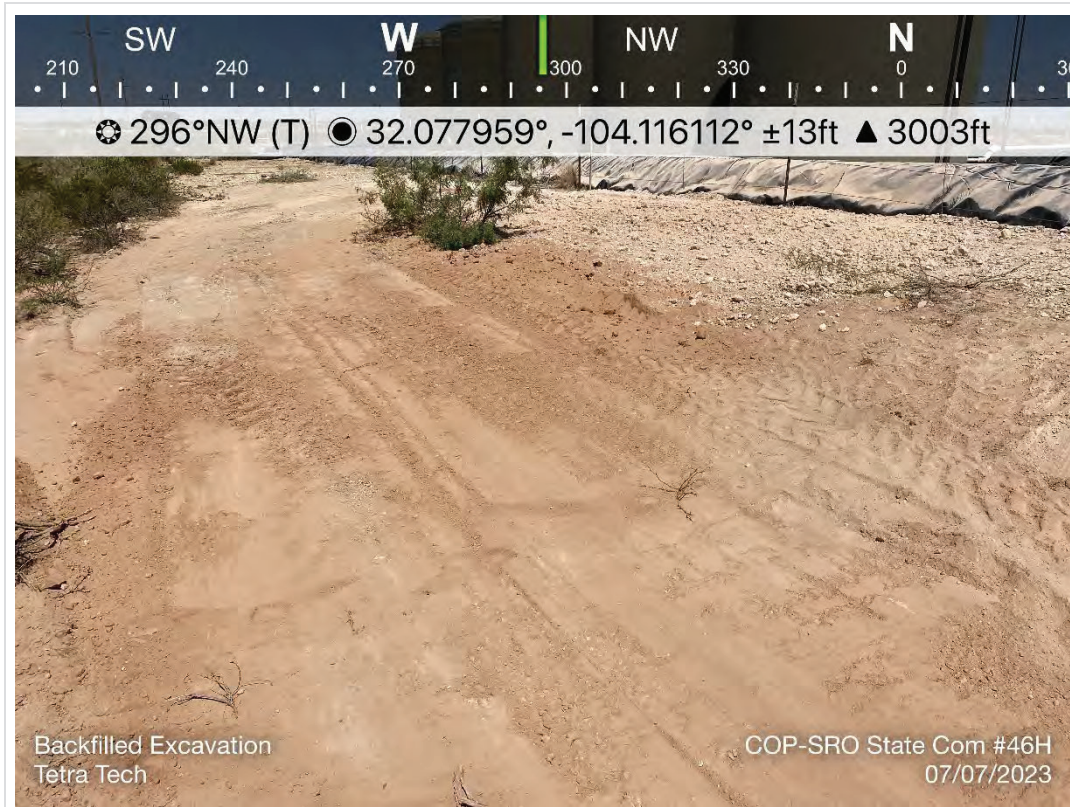


TETRA TECH, INC. PROJECT NO. 212C-MD-03032	DESCRIPTION	View northeast. View of excavation in the release extent outside lined containment.	12
	SITE NAME	SRO State Com #46H	7/6/2023





TETRA TECH, INC. PROJECT NO. 212C-MD-03032	DESCRIPTION	View west. View of excavated area after the area was backfilled.	13
	SITE NAME	SRO State Com #46H	7/6/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03032	DESCRIPTION	View west/northwest. View of excavated area after the area was backfilled.	14
	SITE NAME	SRO State Com #46H	7/6/2023

## **APPENDIX F**

### **Waste Manifests**



## TEXAS NON-HAZARDOUS OILFIELD WASTE MANIFEST

Company Man Contact Information

Name Jacob Laird

Phone No. \_\_\_\_\_



(PLEASE PRINT)

\*REQUIRED INFORMATION\*

## GENERATOR

NO. **298210**

Operator No. \_\_\_\_\_

Permit/PPC No. \_\_\_\_\_

Operators Name Conoco Phillips

Lease/Well \_\_\_\_\_

Address \_\_\_\_\_

Name & No. SRD State/118th/ # 04611County oddy

City, State, Zip \_\_\_\_\_

API No. 30-025-3995T 418666

Phone No. \_\_\_\_\_

Rig Name &amp; No. \_\_\_\_\_

AFE/PO No. \_\_\_\_\_

## EXEMPT E&amp;P Waste/Service Identification and Amount (place volume next to waste type in barrels or cubic yards)

Oil Based Muds	NON-INJECTABLE WATERS	OTHER EXEMPT WASTES (type and generation process of the waste)
Oil Based Cuttings	Washout Water (Non-Injectable)	
Water Based Muds	Completion Fluid/Flow Back (Non-Injectable)	
Water Based Cuttings	Produced Water (Non-Injectable)	
Produced Formation Solids	Gathering Line Water/Waste (Non-Injectable)	
Tank Bottoms	INTERNAL USE ONLY	
E&P Contaminated Soil	Truck Washout (exempt waste)	
Gas Plant Waste		

WASTE GENERATION PROCESS: ☐ DRILLING ☐ COMPLETION ☐ PRODUCTION ☐ GATHERING LINES

## NON-EXEMPT E&amp;P Waste/Service Identification and Amount

All non-exempt E&amp;P waste must be analysed and be below threshold limits for toxicity (TCLP), Ignitability, Corrosivity and Reactivity.

Non-Exempt Other \_\_\_\_\_ \*please select from Non-Exempt Waste List on back

QUANTITY 12 B-BARRELS Y-YARDS E-EACH

I hereby certify that the above listed material(s), is (are) not hazardous waste as defined by 40 CFR Part 261 or any applicable state law. That each waste has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulation.

☐ RCRA EXEMPT:

Oil field wastes generated from oil and gas exploration and production operation and are not mixed with non-exempt waste (R360 Accepts certifications on a per load basis only)

☐ RCRA NON-EXEMPT:

Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24, or listed hazardous waste as defined by 40 CFR, part 261, subpart D, as amended. The following documentation demonstrating the waste as non-hazardous is attached. (Check the appropriate items as provided)

☐ MSDS Information☐ RCRA Hazardous Waste Analysis☐ Other (Provide Description Below)

(PRINT) AUTHORIZED AGENTS SIGNATURE

DATE

SIGNATURE

## TRANSPORTER

Transporter's

Name ETechDriver's Name Emilio J.

Address \_\_\_\_\_

Phone No. \_\_\_\_\_

Phone No. \_\_\_\_\_

Truck No. 28

WHP No. \_\_\_\_\_

I hereby certify that the above named material(s) was/were picked up at the Generator's site listed above and delivered without incident to the disposal facility listed below.

SHIPMENT DATE 7-6-23DRIVER'S SIGNATURE [Signature]DELIVERY DATE 7-6-23DRIVER'S SIGNATURE [Signature]

## TRUCK TIME STAMP

IN: 9:30 AM OUT: \_\_\_\_\_

## DISPOSAL FACILITY

## RECEIVING AREA

Name/No. D1

Site Name/

Permit No.

Address

**Red Bluff Facility / STF-065**

Phone No.

**432-448-4239****5053 US Hwy 285, Orla, TX 79770**NORM READINGS TAKEN? (Circle One) YES NOIf YES, was reading > 50 micro roentgens? (Circle One) YES NO  
NORM (mR/hr) 7

## TANK BOTTOMS

	Feet	Inches
1st Gauge		
2nd Gauge		
Received		

BS&W Received		BS&W (%)	
Free Water			
Total Received			

I hereby certify that the above load material has been (circle one):

ACCEPTED

DENIED

If denied, why?

NAME (PRINT) Michael AndersonDATE 7/23TITLE RicSIGNATURE [Signature]



**Generator** – to be completed by the generator of the waste in transit

**Company man contact information** – Provide the rig manager's name and number

**Operator's Name** – Provide the name of the company from which the waste originates

**Address, City, State, Zip** – Business address for the generator company

**Phone No.** – Provide a phone number where the generator company can be reached

**Permit/RRC No.** – Provide the Railroad Commission permit number

**Lease/Well Name & No.** – Provide the name of the lease/well name and number. If offshore, provide the OCS number

**County** – Provide the county at which the waste was generated in. If offshore, provide the Field name and Block number.

**API No.** – Provide the American Petroleum Institute number; may contain up to 14 digits

**Rig Name & No.** – Provide the name of the drilling contractor and the well number and well name

**AFE/PO No.** – Provide either the Authorization for Expenditure (AFE) number or the Purchase Order (PO) number

**Origination of waste** – Check the option that best describes where the waste originates from

**Drilling** – Waste generated while drilling the well

**Initial Completion** – Waste generated on the original completion (for re-completions see **Production**)

**Production** – Waste generated during the production life of the well (i.e., work overs, re-completions, hydraulic fracturing, gas plant treatment, etc.)

**Commercial Facilities** – Waste that is *generated* at commercial facilities (i.e., Refineries, SWD Wells, Compressor stations, Transfer stations, etc.)

**In Transit** – Waste which is spilled while in transit; NOT to include well gathering lines or field gathering lines; to include contaminated material resulting from the spill (typically trucking, post-production pipelines, or barges)

**Transporter** – To be completed by the waste hauler/transporter in the presence of the generator

**Transporter name** – Provide the company name that is transporting the waste

**Address** – Business address for the transport company

**Driver's Name** – Provide the first and last name of the driver hauling the waste

**Phone No.** – List the phone number at which the transport company can be reached

**WHP No.** – List the Waste Hauler's Permit Number associated with the truck that is hauling the material

### Waste Categories

#### Exempt E&P Waste

##### Oil Based Mud

- Oil Based Drilling fluids
- Off Shore Oil Based Drilling fluids

##### Oil Based Cuttings

- Oil Based Drill cuttings
- Offshore Oil Based cuttings

##### Water Based Mud

- Water Based Drilling fluids
- Offshore Water Based Drilling fluids

##### Water Based Cuttings

- Water Based Drill cuttings
- Offshore Water Based cuttings

##### Produced Formation Sand and Solids

- Hydrogen sulfide abatement wastes from geothermal energy production
- Workover wastes
- Produced sand
- Constituents removed from produced water before it is injected

##### Tank Bottoms

- Basic sediment, water, and other tank bottoms from storage facilities that hold product and exempt waste
- Pit sludges and contaminated bottoms from storage or disposal of exempt wastes
- Accumulated materials such as hydrocarbons, solids, sands, and emulsion from production separators, fluid treating vessels, and production impoundments
- Constituents removed from produced water before it is injected or otherwise disposed of
- Liquid hydrocarbons removed from the production stream but not from oil refining
- Waste crude oil from primary field operations

##### E&P Contaminated Soil

- On-Lease oil spill

##### Wash Out Water

- Rigwash
- Cooling tower blowdown

##### Completion Fluids/Flowback

- Well completion, treatment, and stimulation fluids, and frac proppant
- Packing fluids

##### Produced Water

- Produced water
- Geothermal Production Fluids
- Materials ejected from a producing well during blowdown

##### Gathering Line Water/Waste

- Pipe scale, hydrocarbon solids, hydrates, and other deposits removed from piping and equipment prior to transportation
- Pigging wastes from gathering lines

##### Gas Plant Waste

- Gas plant dehydration wastes, including glycol-based compounds, glycol filters, and filter media, backwash, and molecular sieves
- Gas plant sweetening wastes for sulfur removal, including amines, amine filters, amine filter media, backwash, precipitated amine sludge, iron sponge, and hydrogen sulfide scrubber liquid and sludge
- Spent filters, filter media, and backwash (assuming the filter itself is not hazardous and the residue in it is from an exempt waste stream)
- Wastes from subsurface gas storage and retrieval, except for the non-exempt wastes

#### Non-Exempt E&P Waste

All non-exempt oil & gas waste must be analyzed for and be below the threshold limits for Toxicity (TCLP Metals), Ignitability, Corrosivity and Reactivity.

[www.epa.gov/osw/hazard/wastetypes/characteristic.htm](http://www.epa.gov/osw/hazard/wastetypes/characteristic.htm)

- Unused fracturing fluids or acids
- Gas plant cooling tower cleaning wastes
- Oil and gas service company wastes such as drum rinsate, sandblast media, painting wastes, spent solvents, spilled chemicals, and waste acids
- Vacuum truck and drum rinsate from trucks and drums transporting or containing non-exempt waste
- Non-Exempt E&P liquid and solid wastes generated by crude oil and tank bottom reclaimers
- Waste compressor filters and blowdown
- Non-Exempt E&P waste in transportation pipeline related pits
- Caustic or acid cleaners
- Boiler cleaning wastes
- Boiler scrubber fluids, sludges, and ash
- E&P Contaminated Soil
  - Transportation spill of post-production oil and gas



## TEXAS NON-HAZARDOUS OILFIELD WASTE MANIFEST

Company Man Contact Information



(PLEASE PRINT)

\*REQUIRED INFORMATION\*

Name Jacob Laird

Phone No. \_\_\_\_\_

## GENERATOR

NO. 298211

Operator No. \_\_\_\_\_

Permit/PPC No. \_\_\_\_\_

Operators Name Conoco Phillips

Lease/Well \_\_\_\_\_

Address \_\_\_\_\_

Name & No. SRO State Com #046H

City, State, Zip \_\_\_\_\_

County eddy

Phone No. \_\_\_\_\_

API No. 30-025-2995-41866

Rig Name &amp; No. \_\_\_\_\_

AFE/PO No. \_\_\_\_\_

## EXEMPT E&amp;P Waste/Service Identification and Amount (place volume next to waste type in barrels or cubic yards)

Oil Based Muds	NON-INJECTABLE WATERS	OTHER EXEMPT WASTES (type and generation process of the waste)
Oil Based Cuttings	Washout Water (Non-Injectable)	
Water Based Muds	Completion Fluid/Flow Back (Non-Injectable)	
Water Based Cuttings	Produced Water (Non-Injectable)	
Produced Formation Solids	Gathering Line Water/Waste (Non-Injectable)	
Tank Bottoms	INTERNAL USE ONLY	
E&P Contaminated Soil	Truck Washout (exempt waste)	
Gas Plant Waste		and dump

WASTE GENERATION PROCESS: ☐ DRILLING ☐ COMPLETION ☐ PRODUCTION ☐ GATHERING LINES

## NON-EXEMPT E&amp;P Waste/Service Identification and Amount

All non-exempt E&amp;P waste must be analysed and be below threshold limits for toxicity (TCLP), Ignitability, Corrosivity and Reactivity.

Non-Exempt Other \_\_\_\_\_ \*please select from Non-Exempt Waste List on back

QUANTITY 12 B-BARRELS Y-YARDS E-EACH

I hereby certify that the above listed material(s), is (are) not hazardous waste as defined by 40 CFR Part 261 or any applicable state law. That each waste has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulation.

☐ RCRA EXEMPT:

Oil field wastes generated from oil and gas exploration and production operation and are not mixed with non-exempt waste (R360 Accepts certifications on a per load basis only)

☐ RCRA NON-EXEMPT:

Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24, or listed hazardous waste as defined by 40 CFR, part 261, subpart D, as amended. The following documentation demonstrating the waste as non-hazardous is attached. (Check the appropriate items as provided)

☐ MSDS Information☐ RCRA Hazardous Waste Analysis☐ Other (Provide Description Below)

(PRINT) AUTHORIZED AGENTS SIGNATURE

DATE

SIGNATURE

## TRANSPORTER

Transporter's

Name ETech

Address \_\_\_\_\_

Phone No. \_\_\_\_\_

Driver's Name Emilio J.

Phone No. \_\_\_\_\_

Truck No. 128

WHP No. \_\_\_\_\_

I hereby certify that the above named material(s) was/were picked up at the Generator's site listed above and delivered without incident to the disposal facility listed below.

SHIPMENT DATE 7-6-23DRIVER'S SIGNATURE [Signature]DELIVERY DATE 7-6-23DRIVER'S SIGNATURE [Signature]

## TRUCK TIME STAMP

IN: 11:05 AM OUT: \_\_\_\_\_

## DISPOSAL FACILITY

## RECEIVING AREA

Name/No. 12-1

Site Name/

Permit No. Red Bluff Facility / STF-065Address 5053 US Hwy 285, Orla, TX 79770Phone No. 432-448-4239NORM READINGS TAKEN? (Circle One) YES ☒ NO ☐If YES, was reading > 50 micro roentgens? (Circle One) YES ☐ NO ☒

NORM (mR/hr) \_\_\_\_\_

## TANK BOTTOMS

	Feet	Inches	BS&W Received	BS&W (%)
1st Gauge				
2nd Gauge			Free Water	
Received			Total Received	

I hereby certify that the above load material has been (circle one):

ACCEPTED ☒DENIED ☐

If denied, why? \_\_\_\_\_

NAME (PRINT) Emilio J. LairdDATE 7/23/23TITLE KOCSIGNATURE [Signature]



**Generator** – to be completed by the generator of the waste in transit

**Company man contact information** – Provide the rig manager's name and number

**Operator's Name** – Provide the name of the company from which the waste originates

**Address, City, State, Zip** – Business address for the generator company

**Phone No.** – Provide a phone number where the generator company can be reached

**Permit/RRC No.** – Provide the Railroad Commission permit number

**Lease/ Well Name & No.** – Provide the name of the lease/well name and number. If offshore, provide the OCS number

**County** – Provide the county at which the waste was generated in. If offshore, provide the Field name and Block number.

**API No.** – Provide the American Petroleum Institute number; may contain up to 14 digits

**Rig Name & No.** – Provide the name of the drilling contractor and the well number and well name

**AFE/PO No.** – Provide either the Authorization for Expenditure (AFE) number or the Purchase Order (PO) number

**Origination of waste** – Check the option that best describes where the waste originates from

**Drilling** – Waste generated while drilling the well

**Initial Completion** – Waste generated on the original completion (for re-completions see **Production**)

**Production** – Waste generated during the production life of the well (i.e., work overs, re-completions, hydraulic fracturing, gas plant treatment, etc.)

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**In Transit** – Waste which is spilled while in transit; NOT to include well gathering lines or field gathering lines; to include contaminated material resulting from the spill (typically trucking, post-production pipelines, or barges)

**Transporter** – To be completed by the waste hauler/transporter in the presence of the generator

**Transporter name** – Provide the company name that is transporting the waste

**Address** – Business address for the transport company

**Driver's Name** – Provide the first and last name of the driver hauling the waste

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**WHP No.** – List the Waste Hauler's Permit Number associated with the truck that is hauling the material

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- Off Shore Oil Based Drilling fluids

#### Oil Based Cuttings

- Oil Based Drill cuttings
- Offshore Oil Based cuttings

#### Water Based Mud

- Water Based Drilling fluids
- Offshore Water Based Drilling fluids

#### Water Based Cuttings

- Water Based Drill cuttings
- Offshore Water Based cuttings

#### Produced Formation Sand and Solids

- Hydrogen sulfide abatement wastes from geothermal energy production
- Workover wastes
- Produced sand
- Constituents removed from produced water before it is injected

#### Tank Bottoms

- Basic sediment, water, and other tank bottoms from storage facilities that hold product and exempt waste
- Pit sludges and contaminated bottoms from storage or disposal of exempt wastes
- Accumulated materials such as hydrocarbons, solids, sands, and emulsion from production separators, fluid treating vessels, and production impoundments
- Constituents removed from produced water before it is injected or otherwise disposed of
- Liquid hydrocarbons removed from the production stream but not from oil refining
- Waste crude oil from primary field operations

#### E&P Contaminated Soil

- On-Lease oil spill

#### Wash Out Water

- Rigwash
- Cooling tower blowdown

#### Completion Fluids/Flowback

- Well completion, treatment, and stimulation fluids, and frac proppant
- Packing fluids

#### Produced Water

- Produced water
- Geothermal Production Fluids
- Materials ejected from a producing well during blowdown

#### Gathering Line Water/Waste

- Pipe scale, hydrocarbon solids, hydrates, and other deposits removed from piping and equipment prior to transportation
- Pigging wastes from gathering lines

#### Gas Plant Waste

- Gas plant dehydration wastes, including glycol-based compounds, glycol filters, and filter media, backwash, and molecular sieves
- Gas plant sweetening wastes for sulfur removal, including amines, amine filters, amine filter media, backwash, precipitated amine sludge, iron sponge, and hydrogen sulfide scrubber liquid and sludge
- Spent filters, filter media, and backwash (assuming the filter itself is not hazardous and the residue in it is from an exempt waste stream)
- Wastes from subsurface gas storage and retrieval, except for the non-exempt wastes

### Non-Exempt E&P Waste

All non-exempt oil & gas waste must be analyzed for and be below the threshold limits for Toxicity (TCLP Metals), Ignitability, Corrosivity and Reactivity.

[www.epa.gov/osw/hazard/wastetypes/characteristic.htm](http://www.epa.gov/osw/hazard/wastetypes/characteristic.htm)

- Unused fracturing fluids or acids
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- Oil and gas service company wastes such as drum rinsate, sandblast media, painging wastes, spent solvents, spilled chemicals, and waste acids
- Vacuum truck and drum rinsate from trucks and drums transporting or containing non-exempt waste
- Non-Exempt E&P liquid and solid wastes generated by crude oil and tank bottom reclaimers
- Waste compressor filters and blowdown
- Non-Exempt E&P waste in transportation pipeline related pits
- Caustic or acid cleaners
- Boiler cleaning wastes
- Boiler scrubber fluids, sludges, and ash
- E&P Contaminated Soil
  - Transportation spill of post-production oil and gas



## TEXAS NON-HAZARDOUS OILFIELD WASTE MANIFEST

Company Man Contact information

**R360**  
ENVIRONMENTAL  
SOLUTIONS

(PLEASE PRINT)

\*REQUIRED INFORMATION\*

Name Jacob Laird

Phone No. \_\_\_\_\_

**GENERATOR**NO. 298212

Operator No. \_\_\_\_\_

Permit/PPC No. \_\_\_\_\_

Operators Name Conoco Phillips

Lease/Well \_\_\_\_\_

Address \_\_\_\_\_

Name & No. SRC State com #1046H

City, State, Zip \_\_\_\_\_

County Albany

Phone No. \_\_\_\_\_

API No. 30-045-41866

Rig Name &amp; No. \_\_\_\_\_

AFE/PO No. \_\_\_\_\_

**EXEMPT E&P Waste/Service Identification and Amount (place volume next to waste type in barrels or cubic yards)**

Oil Based Muds	NON-INJECTABLE WATERS	OTHER EXEMPT WASTES (type and generation process of the waste)
Oil Based Cuttings	Washout Water (Non-Injectable)	
Water Based Muds	Completion Fluid/Flow Back (Non-Injectable)	
Water Based Cuttings	Produced Water (Non-Injectable)	
Produced Formation Solids	Gathering Line Water/Waste (Non-Injectable)	
Tank Bottoms		
E&P Contaminated Soil	<b>INTERNAL USE ONLY</b>	
Gas Plant Waste	Truck Washout (exempt waste)	

WASTE GENERATION PROCESS: ☐ DRILLING ☐ COMPLETION ☐ PRODUCTION ☐ GATHERING LINES**NON-EXEMPT E&P Waste/Service Identification and Amount**

All non-exempt E&amp;P waste must be analysed and be below threshold limits for toxicity (TCLP), Ignitability, Corrosivity and Reactivity.

Non-Exempt Other \_\_\_\_\_ \*please select from **Non-Exempt Waste List** on backQUANTITY 8 B-BARRELS Y-YARDS E-EACH

I hereby certify that the above listed material(s), is (are) not hazardous waste as defined by 40 CFR Part 261 or any applicable state law. That each waste has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulation.

- ☐ RCRA EXEMPT: Oil field wastes generated from oil and gas exploration and production operation and are not mixed with non-exempt waste (R360 Accepts certifications on a per load basis only)
- ☐ RCRA NON-EXEMPT: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24, or listed hazardous waste as defined by 40 CFR, part 261, subpart D, as amended. The following documentation demonstrating the waste as non-hazardous is attached. (Check the appropriate items as provided)
- ☐ MSDS Information ☐ RCRA Hazardous Waste Analysis ☐ Other (Provide Description Below)

(PRINT) AUTHORIZED AGENTS SIGNATURE

DATE

SIGNATURE

**TRANSPORTER**Transporter's Name ETechDriver's Name Emilio J.

Address \_\_\_\_\_

Phone No. \_\_\_\_\_

Phone No. \_\_\_\_\_

Truck No. 128

WHP No. \_\_\_\_\_

I hereby certify that the above named material(s) was/were picked up at the Generator's site listed above and delivered without incident to the disposal facility listed below.

SHIPMENT DATE 7-6-23

DRIVER'S SIGNATURE

DELIVERY DATE 7-6-23

DRIVER'S SIGNATURE

**TRUCK TIME STAMP**IN: 1:31 PM OUT: \_\_\_\_\_**DISPOSAL FACILITY****RECEIVING AREA**Name/No. 7-4

Site Name/

Red Bluff Facility / STF-065

Permit No.

Phone No.

432-448-4239

Address

5053 US Hwy 285, Orla, TX 79770

NORM READINGS TAKEN? (Circle One)

YES

NO

If YES, was reading &gt; 50 micro roentgens? (Circle One)

YES

NO

NORM (mR/hr) \_\_\_\_\_

**TANK BOTTOMS**

	Feet	Inches	BS&W Received	BS&W (%)
1st Gauge				
2nd Gauge			Free Water	
Received			Total Received	

I hereby certify that the above load material has been (circle one):

ACCEPTED

DENIED

If denied, why?

NAME (PRINT)

DATE

TITLE

SIGNATURE



**Generator** – to be completed by the generator of the waste in transit

**Company man contact information** – Provide the rig manager's name and number

**Operator's Name** – Provide the name of the company from which the waste originates

**Address, City, State, Zip** – Business address for the generator company

**Phone No.** – Provide a phone number where the generator company can be reached

**Permit/RRC No.** – Provide the Railroad Commission permit number

**Lease/ Well Name & No.** – Provide the name of the lease/well name and number. If offshore, provide the OCS number

**County** – Provide the county at which the waste was generated in. If offshore, provide the Field name and Block number.

**API No.** – Provide the American Petroleum Institute number; may contain up to 14 digits

**Rig Name & No.** – Provide the name of the drilling contractor and the well number and well name

**AFE/PO No.** – Provide either the Authorization for Expenditure (AFE) number or the Purchase Order (PO) number

**Origination of waste** – Check the option that best describes where the waste originates from

**Drilling** – Waste generated while drilling the well

**Initial Completion** – Waste generated on the original completion (for re-completions see **Production**)

**Production** – Waste generated during the production life of the well (i.e., work overs, re-completions, hydraulic fracturing, gas plant treatment, etc.)

**Commercial Facilities** – Waste that is *generated* at commercial facilities (i.e., Refineries, SWD Wells, Compressor stations, Transfer stations, etc.)

**In Transit** – Waste which is spilled while in transit; NOT to include well gathering lines or field gathering lines; to include contaminated material resulting from the spill (typically trucking, post-production pipelines, or barges)

**Transporter** – To be completed by the waste hauler/transporter in the presence of the generator

**Transporter name** – Provide the company name that is transporting the waste

**Address** – Business address for the transport company

**Driver's Name** – Provide the first and last name of the driver hauling the waste

**Phone No.** – List the phone number at which the transport company can be reached

**WHP No.** – List the Waste Hauler's Permit Number associated with the truck that is hauling the material

### Waste Categories

#### Exempt E&P Waste

##### Oil Based Mud

- Oil Based Drilling fluids
- Off Shore Oil Based Drilling fluids

##### Oil Based Cuttings

- Oil Based Drill cuttings
- Offshore Oil Based cuttings

##### Water Based Mud

- Water Based Drilling fluids
- Offshore Water Based Drilling fluids

##### Water Based Cuttings

- Water Based Drill cuttings
- Offshore Water Based cuttings

##### Produced Formation Sand and Solids

- Hydrogen sulfide abatement wastes from geothermal energy production
- Workover wastes
- Produced sand
- Constituents removed from produced water before it is injected

##### Tank Bottoms

- Basic sediment, water, and other tank bottoms from storage facilities that hold product and exempt waste
- Pit sludges and contaminated bottoms from storage or disposal of exempt wastes
- Accumulated materials such as hydrocarbons, solids, sands, and emulsion from production separators, fluid treating vessels, and production impoundments
- Constituents removed from produced water before it is injected or otherwise disposed of
- Liquid hydrocarbons removed from the production stream but not from oil refining
- Waste crude oil from primary field operations

##### E&P Contaminated Soil

- On-Lease oil spill

##### Wash Out Water

- Rigwash
- Cooling tower blowdown

##### Completion Fluids/Flowback

- Well completion, treatment, and stimulation fluids, and frac proppant
- Packing fluids

##### Produced Water

- Produced water
- Geothermal Production Fluids
- Materials ejected from a producing well during blowdown

##### Gathering Line Water/Waste

- Pipe scale, hydrocarbon solids, hydrates, and other deposits removed from piping and equipment prior to transportation
- Pigging wastes from gathering lines

##### Gas Plant Waste

- Gas plant dehydration wastes, including glycol-based compounds, glycol filters, and filter media, backwash, and molecular sieves
- Gas plant sweetening wastes for sulfur removal, including amines, amine filters, amine filter media, backwash, precipitated amine sludge, iron sponge, and hydrogen sulfide scrubber liquid and sludge
- Spent filters, filter media, and backwash (assuming the filter itself is not hazardous and the residue in it is from an exempt waste stream)
- Wastes from subsurface gas storage and retrieval, except for the non-exempt wastes

#### Non-Exempt E&P Waste

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**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 243214

CONDITIONS

Operator:  COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID:  229137
	Action Number:  243214
	Action Type:  [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
bhall	Closure approved. Site will need to meet the requirements of 19.15.29.13 NMAC.	7/24/2023