

July 5, 2023

District Supervisor Oil Conservation Division, District 1 1625 North French Drive Hobbs, New Mexico 88240

#### Re: Release Characterization, Remediation and Closure Report ConocoPhillips Van Gogh Fee 101H Release Unit Letter B, Section 11, Township 24 South, Range 34 East DOR: 5/11/2023 Lea County, New Mexico Incident ID: NAPP2314253030

Sir or Madam:

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips to assess a release caused by an oil dump malfunction resulting in a flare fire on pad at the Van Gogh Fee 101H (API # 30-025-45255) wellhead. The release footprint is located within Public Land Survey System (PLSS) Unit Letter B, Section 11, Township 24 South, Range 34 East, in Lea County, New Mexico (Site). The approximate release point occurred at coordinates 32.2389°, -103.4404°, as shown on Figures 1 and 2.

#### BACKGROUND

According to the C-141 Initial Report, the release occurred on May 11, 2023, and was caused by an oil dump malfunction resulting in a flare fire on pad. Approximately 0.20 barrels (bbls) of oil were released, and no fluid was recovered due to the fire burning off any standing fluid. The provided spill calculator indicates a release area of approximately 950 square feet on the production pad. This release extent was identified based on information provided by ConocoPhillips representatives and a review of photographs taken at the release area. The approximate release extent is shown in Figure 3. The New Mexico Oil Conservation Division (NMOCD) approved the initial C-141 on May 23, 2023 and assigned the release Incident ID NAPP2314253030. The C-141 is included as Appendix A.

#### LAND OWNERSHIP

According to the NMOCD Oil and Gas Map, the site is located on Private land. Prior to assessment and remedial activities, the appropriate parties were contacted and informed of the work and remedial work was coordinated with the landowner.

#### SITE CHARACTERIZATION

A site characterization was performed and no sinkholes, residences, schools, hospitals, institutions, churches, springs, private domestic water wells, springs, playa lakes, wetlands, incorporated municipal boundaries, subsurface mines, or floodplains are located within the distances specified in 19.15. 29 New Mexico Administrative Code (NMAC). The Site is in an area of low karst potential. A New Mexico Office of the State Engineer (NMOSE)-identified stream is located approximately 960 feet south of the release site.

Release Characterization, Remediation and Closure Report July 5, 2023

According to the United States Geological Survey (USGS) groundwater well search through the New Mexico Oil Conservation Division (NMOCD) mapping system, there is one active water well (USGS 321357103265201) within a ½-mile (800-meter) radius of the Site, approximately 0.40 miles (640.7 meters) west of the release point with a depth to water at 43.91 feet below ground surface (bgs). The site characterization data is included in Appendix B.

#### **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 and in accordance with Table I of 19.15.29.12 NMAC, the Site RRALs for the on-pad areas at the release Site are as follows:

Constituent	Site RRALs
Chloride	600 mg/kg
TPH	100 mg/kg
BTEX	50 mg/kg
Benzene	10 mg/kg

#### INITIAL RESPONSE AND REMEDIAL ACTIVITIES

In accordance with 19.15.29.8. B. (4) NMAC that states "the responsible party may commence remediation immediately after discovery of a release," ConocoPhillips elected to begin remediation of the impacted area on May 19, 2023. The on-pad material was excavated by scraping the surface to a depth of 1 to 3 inches bgs, resulting in approximately 5 cubic yards of contaminated soil being removed and sent to R360 Halfway Facility in Hobbs, New Mexico. Following the remedial activities, the area was backfilled and compacted with clean caliche material. Photographic documentation of the release extent before and after the scrape is included in Appendix C. Waste manifests can be found in Appendix D and the initial response area is indicated in Figure 3.

#### SITE ASSESSMENT AND CONFIRMATION SAMPLING RESULTS

Tetra Tech personnel mobilized to the site on June 7, 2023, to collect confirmation samples, following the remedial activities completed by ConocoPhillips. A total of six (6) borings (AH-1 through AH-6) were installed in the boundaries of the scraped area and within the release footprint. Two (2) borings (AH-1 and AH-2) were installed to a depth of 2 feet bgs within the release area footprint to achieve vertical delineation and are representative of floor samples. Four (4) borings (AH-3 through AH-6) were installed to a depth of 1-foot bgs outside the release area footprint to achieve horizontal delineation and are representative of sidewall samples. Soil samples collected were field screened for salinity parts per million (ppm) using an ExStik II EC 400 meter. The approximate release extent and boring locations are shown in Figure 4.

A total of eight (8) samples were collected from the six (6) boring locations and submitted to Cardinal Laboratories (Cardinal) in Hobbs, New Mexico to be analyzed for chlorides via EPA Method 4500.0, TPH via EPA Method 8015M, and BTEX via EPA Method 8021B. A copy of the laboratory analytical report and chain-of-custody documentation are included in Appendix E. Photographic documentation of Site conditions at the time of the assessment is presented in Appendix C.

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Analytical results from the 2023 sampling activities are summarized in Table 1. After review of the analytical results from the sampling event, both horizontal and vertical delineation was achieved following the June 2023 soil sampling activities. All analytical results were below the Site RRALs for all constituents. The boring locations are indicated in Figure 4. The initial response remedial action was successful in removing the contaminant mass to meet the standards of Table I of 19.15.29.12 NMAC.

The release extent consisted of approximately 950 sf. Samples were collected such that each discrete sample (horizontal and vertical) was representative of approximately 200 square feet of remediated area. A total of four (4) samples were collected and analyzed from the release interior (vertical), and four (4) additional samples from the release perimeter (horizontal) were collected and analyzed during the sampling activities. Samples were collected from the surface and subsurface, to be representative of the remediated surface and not clean backfill.

#### CONCLUSION

Based on the results of the site assessment and confirmation sampling, ConocoPhillips respectfully requests closure of the incident. The current release footprint is fully delineated. All analytical results associated with the site sampling event were below applicable Site RRALs following the initial response actions; therefore, remediation of the on-pad release footprint is complete. The impacted surface area was remediated to meet the standards of Table I of 19.15.29.12 NMAC during the initial response remedial activities.

This final closure report has been submitted within 90 days of discovery of the release. This final closure report details the release characterization, remediation activities and the results of the assessment sampling. The final C-141 forms are enclosed in Appendix A. If you have any questions concerning the soil assessment activities for the Site, please call me at (512) 739-7874.

Sincerely,

Tetra Tech, Inc.

Samantha Abbott, P.G. Project Manager

cc: Mr. Jacob Laird, GPBU – ConocoPhillips

Christian M. Llull, P.G. Program Manager

#### LIST OF ATTACHMENTS

#### Figures:

Figure 1 – Overview Map

Figure 2 – Site Location/Topographic Map

Figure 3 – Approximate Release Extent and Initial Response

Figure 4 – Site Assessment

#### Tables:

Table 1 – Summary of Analytical Results – 2023 Soil Assessment

#### Appendices:

Appendix A – C-141 Forms

Appendix B – Site Characterization Data

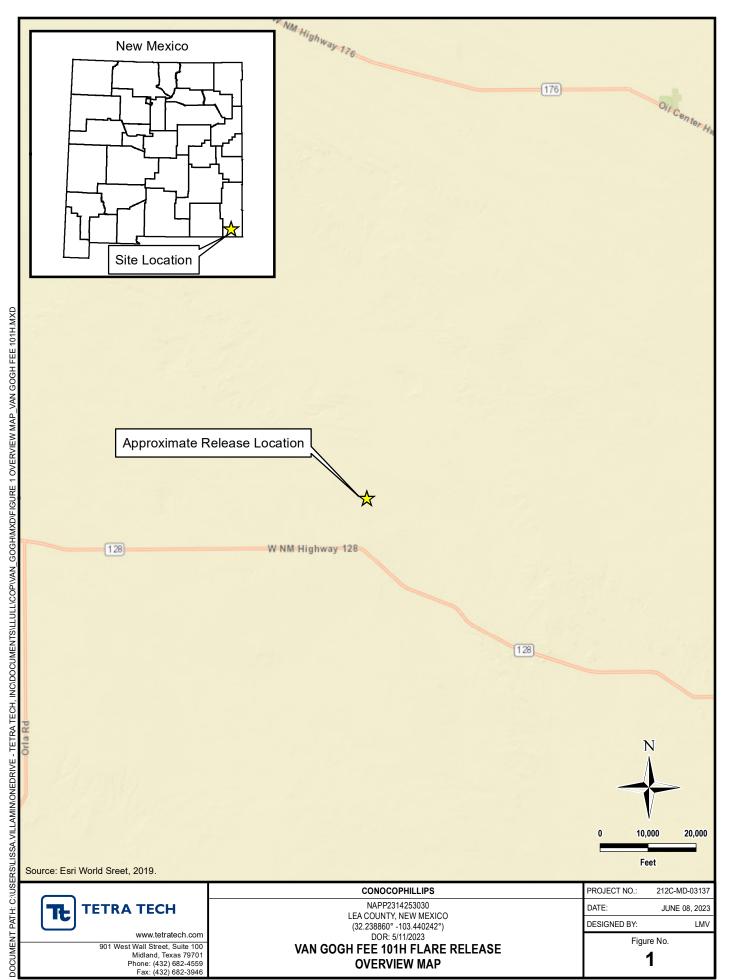
Appendix C – Photographic Documentation

Appendix D – Waste Manifests

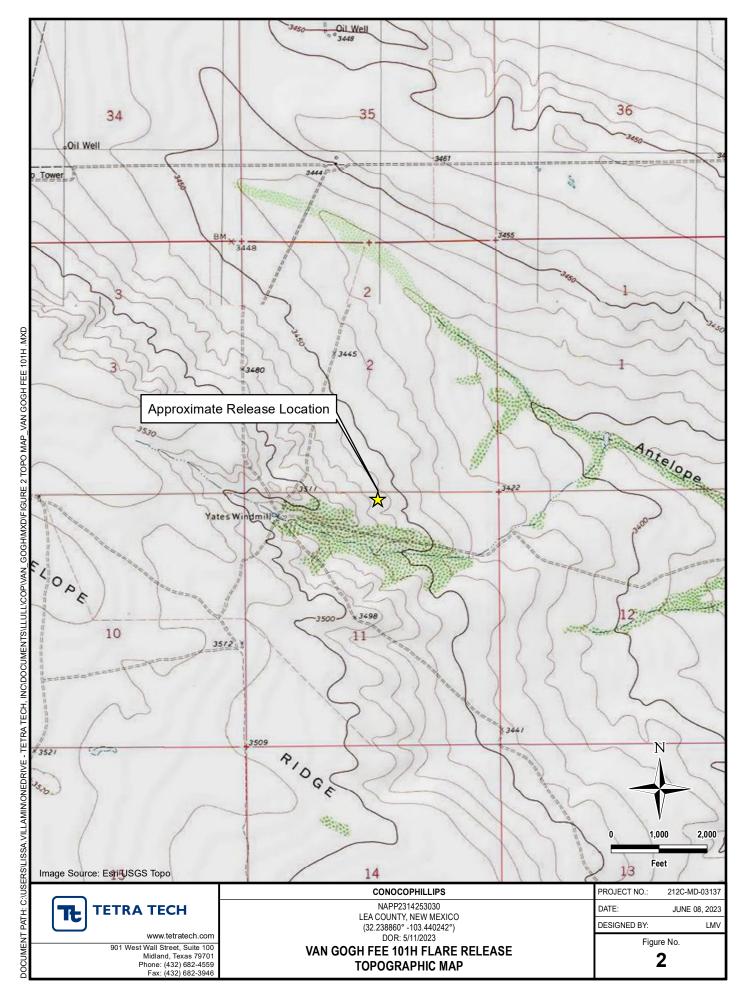
Appendix E – Laboratory Analytical Data

ConocoPhillips

# FIGURES

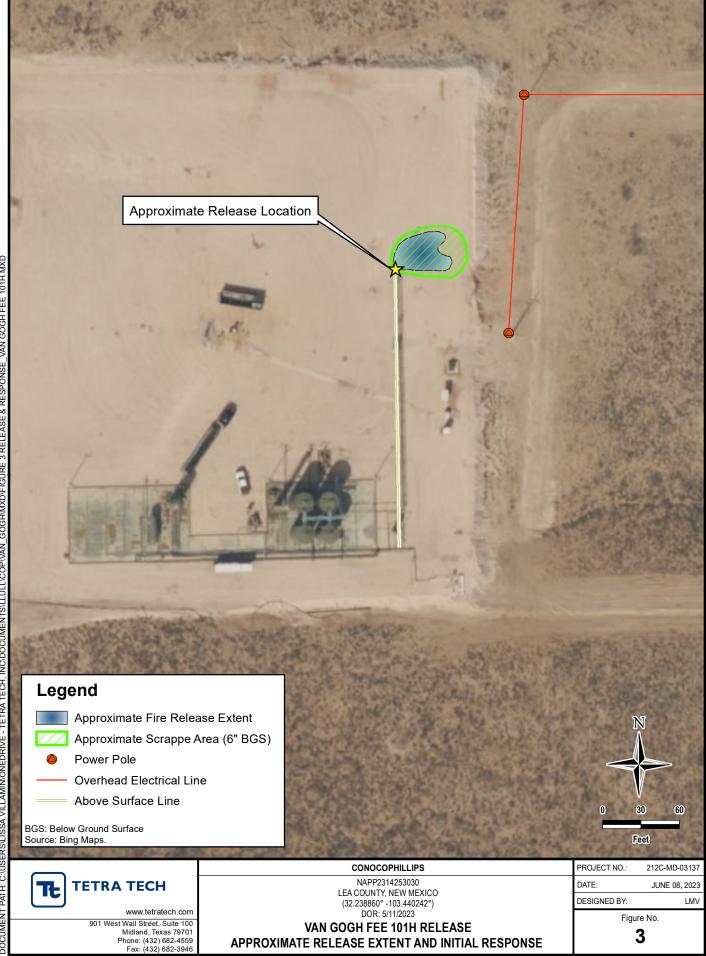


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# TABLES

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#### TABLE 1 SUMMARY OF ANALYTICAL RESULTS 2023 SOIL ASSESSMENT- nAPP2314253030 CONOCOPHILLIPS VAN GOGH 11B FLARE FIRE RELEASE LEA COUNTY, NM

			Field							BTEX	2								Т	РН <sup>3</sup>		
Sample ID	Sample Date	Sample Depth	Screening Results	Chlorid	le1	Benzer	10	Toluer	10	Ethylben	zono	Total Xyl	enec	Total BT	FY	GRO		DRO		EXT DR	10	Total TPH
Sample ib	Sample Date		Chloride			Denzer		Toluer		Luiyibeii	Lene	Total Xyl	enes	Total Di	LX	C <sub>6</sub> - C	10	> C <sub>10</sub> - 0	C <sub>28</sub>	> C <sub>28</sub> - 0	C <sub>36</sub>	(GRO+DRO+EXT DRO)
		ft. bgs	ppm	mg/kg	Q	mg/kg	Q	mg/kg	q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg
AH-1	6/7/2023	0-1	503	64.0		<0.050		<0.050		<0.050		<0.050		<0.050		<10.0		45.5		<10.0		45.5
AIF1	0/1/2023	1-2	101	16.0		<0.050		<0.050		<0.050		<0.050		<0.050		<10.0		<10.0		<10.0		-
AH-2	6/7/2023	0-1	598	80.0		<0.050		<0.050		< 0.050		<0.050		<0.050		<10.0		21.8		<10.0		21.8
AII-2	0/7/2023	1-2	124	<16.0		<0.050		<0.050		<0.050		<0.050		<0.050		<10.0		<10.0		<10.0		-
AH-3	6/7/2023	0-1	230	32.0		<0.050		<0.050		<0.050		<0.050		<0.050		<10.0		<10.0		<10.0		-
AH-4	6/7/2023	0-1	420	96.0		<0.050		<0.050		<0.050		<0.050		<0.050		<10.0		<10.0		<10.0		-
AH-5	6/7/2023	0-1	314	48.0		<0.050		<0.050		<0.050		<0.050		<0.050		<10.0		<10.0		<10.0		-
AH-6	6/7/2023	0-1	447	80.0		<0.050		<0.050		<0.050		<0.050		<0.050		<10.0		20.9		<10.0		20.9

Bold and italicized values indicate exceedance of proposed RRALs and Reclamation Requirements.

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 SM4500Cl-B

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

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Incident ID	
District RP	
Facility ID	
Application ID	

## **Release Notification**

### **Responsible Party**

Responsible Party	OGRID			
Contact Name	Contact Telephone			
Contact email	Incident # (assigned by OCD)			
Contact mailing address				

### **Location of Release Source**

Longitude

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

Site Name	Site Type
Date Release Discovered	API# (if applicable)

Unit Letter	Section	Township	Range	County

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)

Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	Yes No
Condensate	Volume Released (bbls)	Volume Recovered (bbls)
Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)
Cause of Release		

The source of the release has been stopped.

The impacted area has been secured to protect human health and the environment.

If all the actions described above have not been undertaken, explain why:

All free liquids and recoverable materials have been removed and managed appropriately.

Page	2
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### Oil Conservation Division

Incident ID	
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Was this a major release as defined by 19.15.29.7(A) NMAC?	If YES, for what reason(s) does the responsible party consider this a major release?
Yes No	
If YES, was immediate no	otice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?

### **Initial Response**

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

Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.

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	Title:
Signature: _ Battane Jopanger	Date:
email:	Telephone:
OCD Only	
Received by: Jocelyn Harimon	Date:05/23/2023

						L48 Spill Volume Es	timate Form - Fil			NAPP231	4253030
Received by OCD: 7/11/2023 9:37:00 AM Facility Name & Well Number(s):						45AM	ge 1308 944				
		F	Provide an	y known deta	ils about the event:	KO SWAMPPED OUT SEND	DING FLUID TO FLARE				
			<u>ex</u>			Recovered Volume (bbl.) (if available, not included in volume calculations)	Method of Determination (dropdown)	Release Type (dropdown):	> 1/2" of Rain in Last 24 Hours (dropdown):	included in vo	er Recovered (not lume calculations, mational):
BU:	Permian	~	Asse	t Area:	DBE - Asset Avg.	0	Field Measurement	Oil	No		0%
				Known V	olume (dropdown):	No					
				Know	n Area (dropdown):	No					
		2			Spill Ca	alculation - Subsurface Spill	- Rectangle	<u></u>		Remediation	Recommendation
Convert Irregular shap into a series of rectangles	e Length (ft.)	Width (ft.)	Average Depth (in.)	On/Off Pad (dropdown )	Soil Spilled-Fluid Saturation (%.)	Estimated volume of each area (bbl.)	Total Estimated Volume of Spill (bbl.)			Total Estimated Contaminated Soil, uncompacted, 25% (yd <sup>3</sup> .)	Current Rule of Thumb - RMR Handover Volume, (yd <sup>3</sup> .)
Rectangle A	50.0	15.0		On-Pad~	10.50%	1.39	0.15			0.36	
Rectangle B Rectangle C Rectangle D	20.0	10.0		Off-Pad∽ On-Pad∽ ∽	15.02% 10.50%	0.37 0.00 0.00	0.06 0.00			0.10 0.00 0.00	-
Rectangle E				~		0.00				0.00	750
Rectangle F				~		0.00	<i>K</i>			0.00	/50
Rectangle G				~		0.00	3			0.00	-
Rectangle H				~		0.00	0			0.00	-
- Released to	Imagi	ng: 1	9/2/202	3 12:12	:24 PM ——	0.00				0.00	· .
Rectallyle J			5			bsurface Volume Released:	0.20			0.46	BU

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Oil Conservation Division

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Incident ID	
District RP	
Facility ID	
Application ID	

## Site Assessment/Characterization

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

What is the shallowest depth to groundwater beneath the area affected by the release?	(ft bgs)
Did this release impact groundwater or surface water?	🗌 Yes 🗌 No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	🗌 Yes 🗌 No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	🗌 Yes 🗌 No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	🗌 Yes 🗌 No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	🗌 Yes 🗌 No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	🗌 Yes 🗌 No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	🗌 Yes 🗌 No
Are the lateral extents of the release within 300 feet of a wetland?	🗌 Yes 🗌 No
Are the lateral extents of the release overlying a subsurface mine?	🗌 Yes 🗌 No
Are the lateral extents of the release overlying an unstable area such as karst geology?	🗌 Yes 🗌 No
Are the lateral extents of the release within a 100-year floodplain?	🗌 Yes 🗌 No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	🗌 Yes 🗌 No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

<u>Characterization Report Checklist:</u> Each of the following items must be included in the report	Characterization Report (	Checklist: Ea	ich of the	following	items must	be included	l 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.

Received by OCD: 7/11/20	<b>323 9:37:00</b> AM State of New Mexico			<b>Page 17 of 4</b> 4			
Form C-141			Incident ID				
Page 4	Oil Conservation Division		District RP				
			Facility ID				
			Application ID				
regulations all operators are public health or the environ failed to adequately investi addition, OCD acceptance and/or regulations. Printed Name: Signature: <u>Jacob</u> email:	Dermation given above is true and complete to the e required to report and/or file certain release not ment. The acceptance of a C-141 report by the gate and remediate contamination that pose a thr of a C-141 report does not relieve the operator o	tifications and perform cc OCD does not relieve the eat to groundwater, surfa f responsibility for compl 	prrective actions for rele e operator of liability sh- ice water, human health liance with any other fe	eases which may endanger ould their operations have or the environment. In deral, state, or local laws			
OCD Only							
Received by: <u>Shelly W</u>	fells	Date: <u>7/11/2</u>	.023				

Page 6

Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

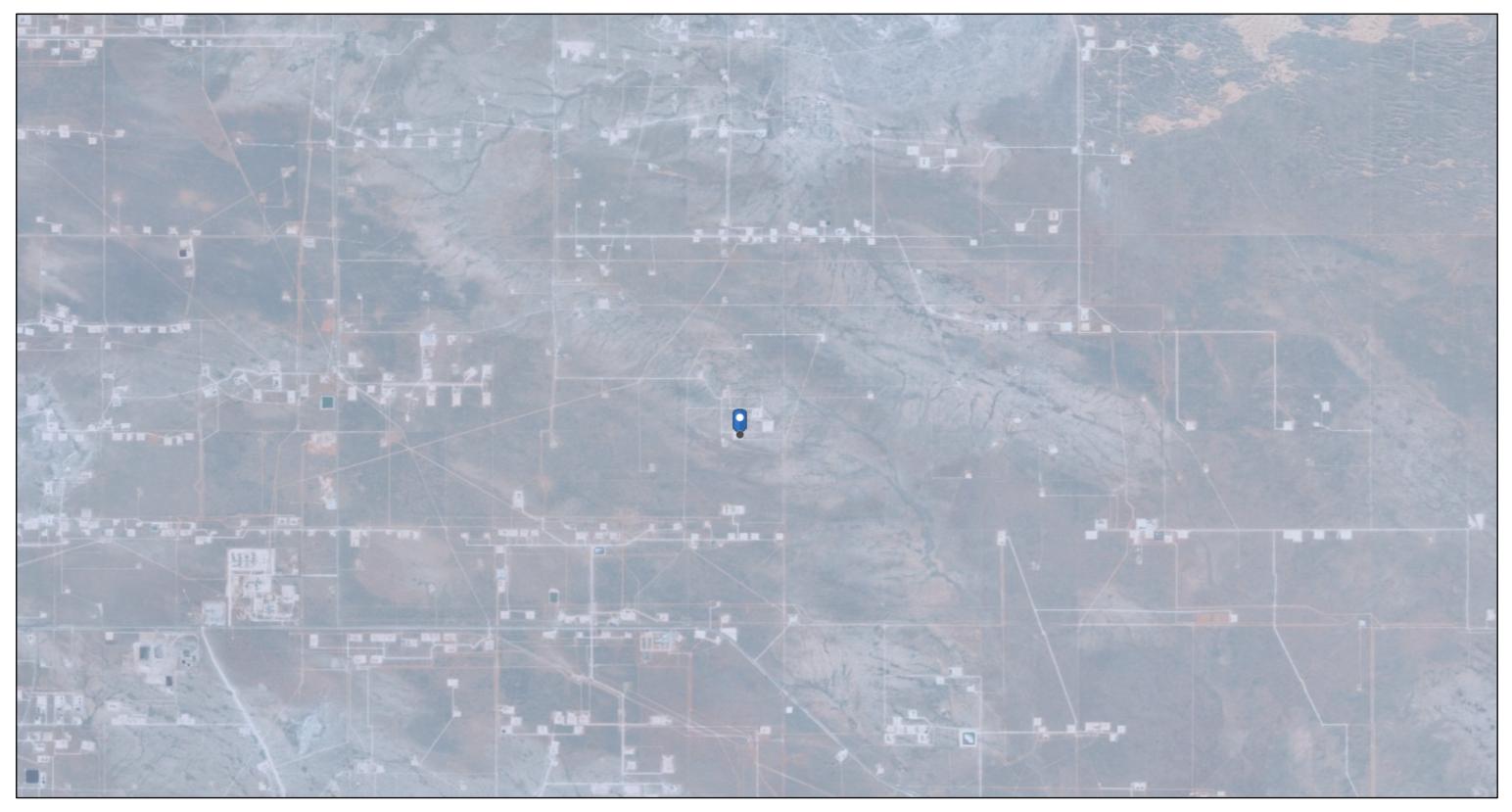
## Closure

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.

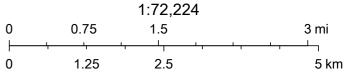
Closure Report Attachment Checklist: Each of the following i	tems must be included in the closure report.				
A scaled site and sampling diagram as described in 19.15.29.1	11 NMAC				
Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate 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					
and regulations all operators are required to report and/or file certai may endanger public health or the environment. The acceptance of	ations. The responsible party acknowledges they must substantially nditions that existed prior to the release or their final land use in				
Printed Name:	Title:				
Signature: Jacob Laird	Date:				
email:					
OCD Only					
Received by: Shelly Wells	Date: <u>7/11/2023</u>				
	of liability should their operations have failed to adequately investigate and water, human health, or the environment nor does not relieve the responsible for regulations.				
Closure Approved by:	Date:10/02/2023				
Printed Name: Nelson Velez	Title: Environmental Specialist - Adv				
Operator did not meet 19.15.29.12D (1a) NMAC. Forbe resolved.	arance given on 09/27/2023 (see App ID 236326). Release				

## APPENDIX B Site Characterization Data

# OCD - Karst Potential Map

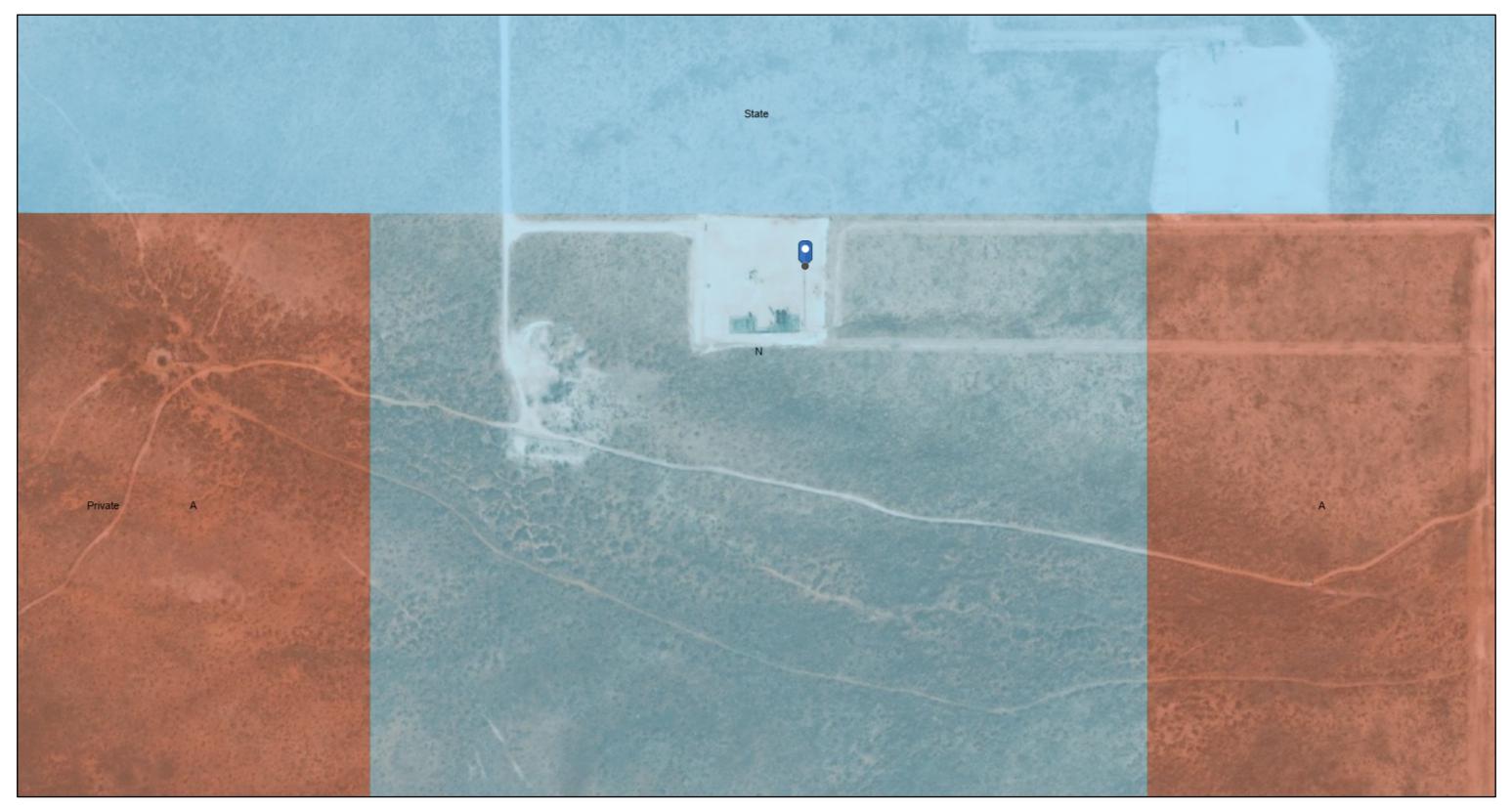


6/7/2023, 2:00:33 PM Karst Occurrence Potential

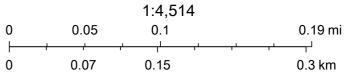


BLM, OCD, New Mexico Tech, Esri, HERE, Garmin, Earthstar Geographics

# OCD - Ownership Map



## 6/7/2023, 1:58:00 PM Mineral Ownership Land Ownership A-All minerals are owned by U.S. P N-No minerals are owned by the U.S. S



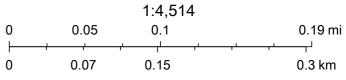
U.S. BLM, Esri, HERE, Garmin, iPC, Maxar

# **OCD - USGS Groundwater Wells**



### 6/7/2023, 2:06:53 PM

- USGS Historical GW Wells
- USGS Active Monitoring GW Wells



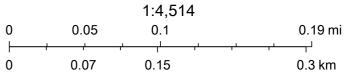
USGS, Esri, HERE, Garmin, iPC, Maxar

# OCD - Waterbodies Map



6/7/2023, 1:52:49 PM

OSE Streams



Esri, HERE, Garmin, iPC, Maxar, NM OSE



(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 ar (quarters ar			,	D83 UTM in met	ers)	(1	n feet)	
POD Number	POD Sub- Code basin Cou	Q Q Q Inty 64 16 4 S	Sec Tws	Rng	x	Y	Distance	•	Depth Water (	Water Column
C 02387	CUB LI	E 1	11 24S	34E 64	6513	3567613* 🌍	571	62	40	22
						Averag	e Depth to	Water:	40 1	feet
							Minimum	Depth:	40 1	feet
							Maximum	Depth:	40 1	feet
Decend County 4										

#### Record Count: 1

UTMNAD83 Radius Search (in meters):

Easting (X): 646952.17

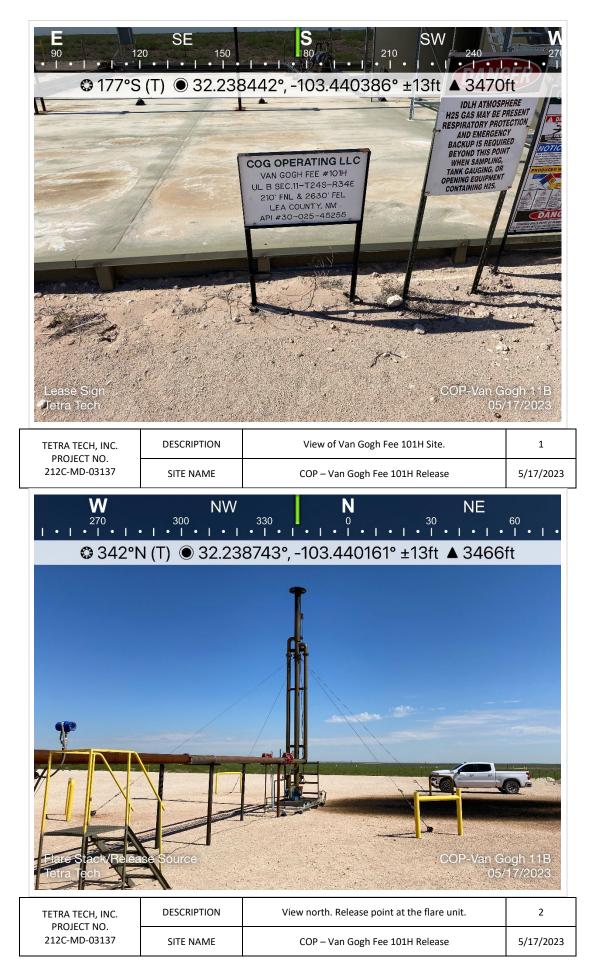
Northing (Y): 3567979.2

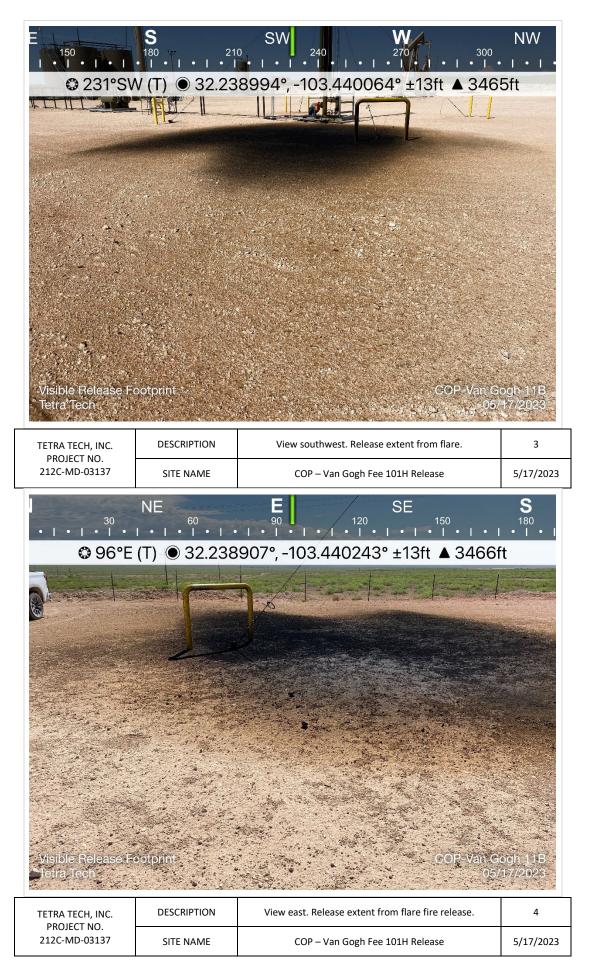
**Radius: 800** 

#### \*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.

# APPENDIX C Photographic Documentation

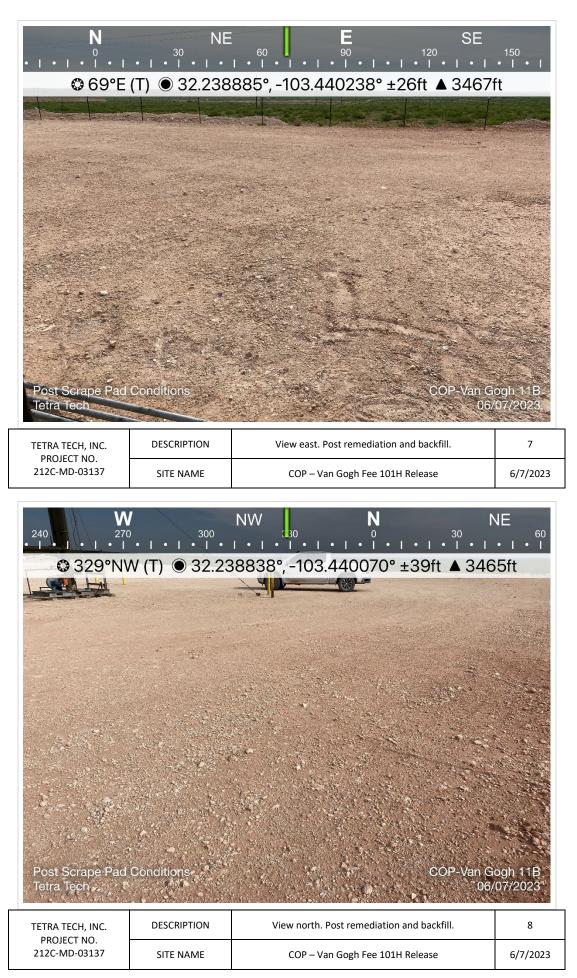






TETRA TECH, INC. PROJECT NO.	DESCRIPTION	View west. Release extent from flare fire release.	5
212C-MD-03137	SITE NAME	COP – Van Gogh Fee 101H Release	5/17/2023





## APPENDIX D Waste Manifests

Received by OCD: 7/11/2023 9:37:00	AM Customer #: Ordered by: AFE #: PO #: Manifest #: Manif. Date: Hauler: Driver Truck # Card # Job Ref #	MICHELLE MULLINS	Ticket #: Bid #: Date: Generator: Generator #: Well Ser. #: Well Ser. #: Well Name: Well #: Field: Field #: Rig: County	700-1431990 O6UJ9A000JEC 5/19/2023 CONOCOPHILLIPS 40946	Page 31 of 44
Facility: CRI	All. 202 A				
Product / Service		Quantity L	Jnits		na an taon 1980 - Line Anno 1980 - Li 1980 - Line Anno 1980 - Li
Contaminated Soil (RCRA Exemp	t)	5.00	yards		
Generator Certification Statemen I hereby certify that according to the Re 1988 regulatory determination, the abov X RCRA Exempt: Oil Field wastes ge RCRA Non-Exempt: Oil field wast characteristics established in RCRA reg amended. The following documentatio MSDS Information RCRA Here	esource Conserv ve described wa enerated from of e which is non- gulations, 40 CF n is attached to	vation and Recovery Act (RCRA) and ste is: il and gas exploration and production hazardous that does not exceed the m R 261.21-261.24 or listed hazardous v demonstrate the above-described was	operations and inimum standar vaste as defined ste is non-hazard	are not mixed with non- ds for waste hazardous in 40 CFR, part 261, su dous. (Check the approp	exempt wasto by bpart D, as
Driver/ Agent Signature		R360 Representative Si	ignature WMT		
Customer Approval					
	<b>`<b>[</b>]   ;</b>	S IS NOT AN INVOID	E!		
Approved By:		Date:			

.

## APPENDIX E Laboratory Analytical Data



June 12, 2023

CHRISTIAN LLULL TETRA TECH 901 WEST WALL STREET , STE 100 MIDLAND, TX 79701

RE: VAN GOGH 11B FLARE FIRE RELEASE

Enclosed are the results of analyses for samples received by the laboratory on 06/07/23 11:05.

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 <a href="https://www.tceq.texas.gov/field/qa/lab\_accred\_certif.html">www.tceq.texas.gov/field/qa/lab\_accred\_certif.html</a>.

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

Celey D. Keine

Celey D. Keene Lab Director/Quality Manager



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

Received:	06/07/2023	Sampling Date:	06/07/2023
Reported:	06/12/2023	Sampling Type:	Soil
Project Name:	VAN GOGH 11B FLARE FIRE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03137	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

#### Sample ID: AH - 1 ( 0-1' ) (H232888-01)

BTEX 8021B	mg	/kg	Analyze	d By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/07/2023	ND	2.49	124	2.00	19.8	
Toluene*	<0.050	0.050	06/07/2023	ND	2.57	128	2.00	20.9	
Ethylbenzene*	<0.050	0.050	06/07/2023	ND	2.43	122	2.00	20.7	
Total Xylenes*	<0.150	0.150	06/07/2023	ND	7.61	127	6.00	22.5	
Total BTEX	<0.300	0.300	06/07/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	112	% 71.5-13	4						
Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	06/07/2023	ND	432	108	400	0.00	
TPH 8015M	mg	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/08/2023	ND	173	86.4	200	24.7	
DRO >C10-C28*	45.5	10.0	06/08/2023	ND	163	81.5	200	19.8	
EXT DRO >C28-C36	<10.0	10.0	06/08/2023	ND					
Surrogate: 1-Chlorooctane	97.7	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	98.4	% 49.1-14	8						

#### Cardinal Laboratories

#### \*=Accredited Analyte

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



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

Received:	06/07/2023	Sampling Date:	06/07/2023
Reported:	06/12/2023	Sampling Type:	Soil
Project Name:	VAN GOGH 11B FLARE FIRE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03137	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

#### Sample ID: AH - 1 ( 1'-2' ) (H232888-02)

BTEX 8021B	mg	'kg	Analyze	d By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/08/2023	ND	2.49	124	2.00	19.8	
Toluene*	<0.050	0.050	06/08/2023	ND	2.57	128	2.00	20.9	
Ethylbenzene*	<0.050	0.050	06/08/2023	ND	2.43	122	2.00	20.7	
Total Xylenes*	<0.150	0.150	06/08/2023	ND	7.61	127	6.00	22.5	
Total BTEX	<0.300	0.300	06/08/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	108	% 71.5-13	4						
Chloride, SM4500Cl-B	mg,	kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	06/07/2023	ND	432	108	400	0.00	
TPH 8015M	mg/	'kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/08/2023	ND	173	86.4	200	24.7	
DRO >C10-C28*	<10.0	10.0	06/08/2023	ND	163	81.5	200	19.8	
EXT DRO >C28-C36	<10.0	10.0	06/08/2023	ND					
Surrogate: 1-Chlorooctane	111 9	48.2-13	4						
Surrogate: 1-Chlorooctadecane	109	% 49.1-14	8						

#### Cardinal Laboratories

#### \*=Accredited Analyte

Celez D. Keine

Celey D. Keene, Lab Director/Quality Manager



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

Received:	06/07/2023	Sampling Date:	06/07/2023
Reported:	06/12/2023	Sampling Type:	Soil
Project Name:	VAN GOGH 11B FLARE FIRE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03137	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

#### Sample ID: AH - 2 ( 0-1' ) (H232888-03)

BTEX 8021B	mg	/kg	Analyze	d By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/08/2023	ND	2.49	124	2.00	19.8	
Toluene*	<0.050	0.050	06/08/2023	ND	2.57	128	2.00	20.9	
Ethylbenzene*	<0.050	0.050	06/08/2023	ND	2.43	122	2.00	20.7	
Total Xylenes*	<0.150	0.150	06/08/2023	ND	7.61	127	6.00	22.5	
Total BTEX	<0.300	0.300	06/08/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	111 9	% 71.5-13	4						
Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	06/07/2023	ND	432	108	400	0.00	
TPH 8015M	mg,	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/08/2023	ND	173	86.4	200	24.7	
DRO >C10-C28*	21.8	10.0	06/08/2023	ND	163	81.5	200	19.8	
EXT DRO >C28-C36	<10.0	10.0	06/08/2023	ND					
Surrogate: 1-Chlorooctane	97.0	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	94.8	% 49.1-14	8						

#### Cardinal Laboratories

#### \*=Accredited Analyte

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



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

Received:	06/07/2023	Sampling Date:	06/07/2023
Reported:	06/12/2023	Sampling Type:	Soil
Project Name:	VAN GOGH 11B FLARE FIRE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03137	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

#### Sample ID: AH - 2 ( 1'-2' ) (H232888-04)

BTEX 8021B	mg,	/kg	Analyze	d By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/08/2023	ND	2.49	124	2.00	19.8	
Toluene*	<0.050	0.050	06/08/2023	ND	2.57	128	2.00	20.9	
Ethylbenzene*	<0.050	0.050	06/08/2023	ND	2.43	122	2.00	20.7	
Total Xylenes*	<0.150	0.150	06/08/2023	ND	7.61	127	6.00	22.5	
Total BTEX	<0.300	0.300	06/08/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	108	% 71.5-13	4						
Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	06/07/2023	ND	432	108	400	0.00	
TPH 8015M	mg,	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/08/2023	ND	173	86.4	200	24.7	
DRO >C10-C28*	<10.0	10.0	06/08/2023	ND	163	81.5	200	19.8	
EXT DRO >C28-C36	<10.0	10.0	06/08/2023	ND					
Surrogate: 1-Chlorooctane	111 9	48.2-13	4						
Surrogate: 1-Chlorooctadecane	111 9	49.1-14	8						

#### Cardinal Laboratories

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



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

Received:	06/07/2023	Sampling Date:	06/07/2023
Reported:	06/12/2023	Sampling Type:	Soil
Project Name:	VAN GOGH 11B FLARE FIRE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03137	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

#### Sample ID: AH - 3 ( 0-1' ) (H232888-05)

BTEX 8021B	mg/	′kg	Analyze	d By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/08/2023	ND	2.49	124	2.00	19.8	
Toluene*	<0.050	0.050	06/08/2023	ND	2.57	128	2.00	20.9	
Ethylbenzene*	<0.050	0.050	06/08/2023	ND	2.43	122	2.00	20.7	
Total Xylenes*	<0.150	0.150	06/08/2023	ND	7.61	127	6.00	22.5	
Total BTEX	<0.300	0.300	06/08/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	109 9	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/	′kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	06/07/2023	ND	432	108	400	0.00	
TPH 8015M	mg/	′kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/08/2023	ND	173	86.4	200	24.7	
DRO >C10-C28*	<10.0	10.0	06/08/2023	ND	163	81.5	200	19.8	
EXT DRO >C28-C36	<10.0	10.0	06/08/2023	ND					
Surrogate: 1-Chlorooctane	90.0	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	92.4	% 49.1-14	8						

#### Cardinal Laboratories

#### \*=Accredited Analyte

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



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

Received:	06/07/2023	Sampling Date:	06/07/2023
Reported:	06/12/2023	Sampling Type:	Soil
Project Name:	VAN GOGH 11B FLARE FIRE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03137	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

#### Sample ID: AH - 4 ( 0-1' ) (H232888-06)

BTEX 8021B	mg/	′kg	Analyze	d By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/08/2023	ND	2.49	124	2.00	19.8	
Toluene*	<0.050	0.050	06/08/2023	ND	2.57	128	2.00	20.9	
Ethylbenzene*	<0.050	0.050	06/08/2023	ND	2.43	122	2.00	20.7	
Total Xylenes*	<0.150	0.150	06/08/2023	ND	7.61	127	6.00	22.5	
Total BTEX	<0.300	0.300	06/08/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	108 9	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/	′kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	16.0	06/07/2023	ND	432	108	400	0.00	
TPH 8015M	mg/	′kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/08/2023	ND	173	86.4	200	24.7	
DRO >C10-C28*	<10.0	10.0	06/08/2023	ND	163	81.5	200	19.8	
EXT DRO >C28-C36	<10.0	10.0	06/08/2023	ND					
Surrogate: 1-Chlorooctane	93.3	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	92.3	% 49.1-14	8						

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#### \*=Accredited Analyte

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



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

Received:	06/07/2023	Sampling Date:	06/07/2023
Reported:	06/12/2023	Sampling Type:	Soil
Project Name:	VAN GOGH 11B FLARE FIRE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03137	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

#### Sample ID: AH - 5 ( 0-1' ) (H232888-07)

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	06/09/2023	ND	2.22	111	2.00	1.28	
Toluene*	<0.050	0.050	06/09/2023	ND	2.21	111	2.00	0.322	
Ethylbenzene*	<0.050	0.050	06/09/2023	ND	2.26	113	2.00	1.27	
Total Xylenes*	<0.150	0.150	06/09/2023	ND	6.68	111	6.00	1.15	
Total BTEX	<0.300	0.300	06/09/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	105 9	% 71.5-13	4						
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	06/07/2023	ND	432	108	400	0.00	
TPH 8015M mg/kg		′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	06/08/2023	ND	173	86.4	200	24.7	
DRO >C10-C28*	<10.0	10.0	06/08/2023	ND	163	81.5	200	19.8	
EXT DRO >C28-C36	<10.0	10.0	06/08/2023	ND					
Surrogate: 1-Chlorooctane	99.4	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	96.0	% 49.1-14	8						

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#### \*=Accredited Analyte

Celez D. Keine

Celey D. Keene, Lab Director/Quality Manager



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

Received:	06/07/2023	Sampling Date:	06/07/2023
Reported:	06/12/2023	Sampling Type:	Soil
Project Name:	VAN GOGH 11B FLARE FIRE RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-03137	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

#### Sample ID: AH - 6 ( 0-1' ) (H232888-08)

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	06/09/2023	ND	2.22	111	2.00	1.28	
Toluene*	<0.050	0.050	06/09/2023	ND	2.21	111	2.00	0.322	
Ethylbenzene*	<0.050	0.050	06/09/2023	ND	2.26	113	2.00	1.27	
Total Xylenes*	<0.150	0.150	06/09/2023	ND	6.68	111	6.00	1.15	
Total BTEX	<0.300	0.300	06/09/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	103	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	06/07/2023	ND	432	108	400	0.00	
TPH 8015M mg/kg		/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	06/08/2023	ND	173	86.4	200	24.7	
DRO >C10-C28*	20.9	10.0	06/08/2023	ND	163	81.5	200	19.8	
EXT DRO >C28-C36	<10.0	10.0	06/08/2023	ND					
Surrogate: 1-Chlorooctane	84.7	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	84.8	% 49.1-14	8						

#### Cardinal Laboratories

#### \*=Accredited Analyte

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



#### **Notes and Definitions**

QR-04	The RPD for the BS/BSD was outside of historical limits.
BS-3	Blank spike recovery outside of lab established statistical limits, but still within method limits. Data is not adversely affected.
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

Celez D. Keine

Celey D. Keene, Lab Director/Quality Manager

PLEASE MOTE: Liability and Damages Cardhau's lability and clamits anchaive remedy for my claim analysis, All claims including those for my diginizes and any other cause whatlower that be determined wave uses made in weiting and re- analysis, All claims including those for my diginizes and any other cause whatlower that be determined wave uses made in weiting and re- service. In no event what Caerdhau's ballo the performance of services hereander by Cardinal, ingantiess of weither such claims as the mellining of or related to the performance of services hereander by Cardinal, ingantiess of weither such claims as the <b>Relining uished By:</b> Relining uished By: Delivered By: (Circle One) Delivered By: (Circle One) Delivered Terms C (, ) Sampler - UPS - Bus - Other: Corrected Temp. °C (, ) Corrected Temp. °C (, )	Address: City: State: Zip: Project #: 2/1//10-03/57 Project Owner/ onco Phillips Project Location: Lea Genchy MM Sampler Name: Cologh 1/18 Place Pare Advala Sampler Name: Cologh 1/18 Place Pare Advala For University MM Sample I.D. Sample I.D. Gi(G)RAB OR (C)OMP 4/23 (0-1) City = 20-11 City = 20-11	TUT Last Mariand, Hobbs, NM 88240         (575) 393-2326         Company Name:         Teld         Project Manager:
t or hot, shall be limited to the amount paid by the client for the off received by Cardinal within 30 days after completion of the applicable. It is subsidiaries. It	OTHER: Fax State	P.O. #
The     Ite     Ite </td <td>&lt;</td> <td>ANALYSIS REQUEST</td>	<	ANALYSIS REQUEST

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

Operator:	OGRID:
COG OPERATING LLC	229137
600 W Illinois Ave	Action Number:
Midland, TX 79701	238389
	Action Type:
	[C-141] Release Corrective Action (C-141)

#### CONDITIONS

Created By	Condition	Condition Date
nvelez	Operator did not meet 19.15.29.12D (1a) NMAC. Forbearance given on 09/27/2023 (see App ID 236326). Release resolved.	10/2/2023

CONDITIONS

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Action 238389