Red Willow Production Company: NC Ute 23D-2H (nAPP2401640502) Site Assessment/Spill Characterization and Remediation Plan

- 1. Event and Background: On January 15, 2024 a leak of approximately 150 bbl of produced water with no visible evidence of hydrocarbons inside of secondary containment was discovered at Red Willow's "NC Ute 23D-2H" location (a Fruitland Coal well). The transfer pump froze allowing the production tanks to empty into the lined secondary containment tank battery mixing with the snow and stormwater already in the containment. A water truck was dispatched to recover what it could from the containment (produced water and snowmelt) and subsequently more snowmelt/released produced water continued to be recovered later as it thawed. Red Willow then had the gravel removed from the secondary containment to inspect the integrity of the liner; unfortunately, several small holes approximately ½" in diameter were observed. No signs of vegetation or soil impacts are visible near the backside of the tank battery where any produced water would have migrated off location via the stormwater diversion ditch.
- 2. Site Assessment
 - a. Potential impacts from the contaminant(s) of concern:
 - The water gathering system from Red Willow's Fruitland coal formation wells in the area are a source for sodium bicarbonate impacts to soil structure and vegetation in the release area.
 - b. Distance from producing agricultural land:
 - The majority of the spill stayed within the lined secondary containment and was
 recovered; while only an unknown, likely small volume may have permeated out of
 small holes in the liner. The nearest producing agricultural field is approximately 0.4
 miles to the Northwest and is geographically isolated from the release by the San Juan
 River; the release is not immediately adjacent to any producing agricultural fields.
 - c. Distance to nearest surface water, irrigation canal or Waters of the U.S. (WOTUS):
 - The San Juan River is a jurisdictional drainage that is approximately 450' to the Northwest and downgradient of the release.
 - d. Geologic and hydrologic characteristics:
 - Direction of groundwater flow is South/Southwest;
 - Predominant soil type is Bayfield silty clay loam, 1 to 3 percent slopes. Depth to a restrictive feature is more than 80", Depth to water table is more than 80", Drainage class is well-drained. Secondary soil type is Vigil very gravelly loamy fine sand, 0 to 3 percent slopes. Depth to a restrictive feature is more than 80", Depth to water table is 30 to 70", Drainage class is moderately well-drained.
 - Seasonal hydrologic variability N/A; area does not have the potential to be flood irrigated during irrigation season.
 - e. Distance to nearest permitted domestic/agricultural water well and depth to groundwater:
 - No domestic/agricultural water wells are within 0.5 miles of the release.
 - The nearest domestic water well (permit #256417) is located approximately 0.75 miles to the Northeast, total depth is 140', static water level is reported to be 8' (see attachment).
 - f. Determination of cleanup standards:
 - Closure Criteria for Soils Impacted by a Release as outlined in Table 1 of 19.15.29.12 NMAC specifically for depth to groundwater estimated to be ≤50′ will be used.
- 3. Spill Characterization/Sampling Plan
 - a. Sampling and analysis:

- The stormwater diversion ditch behind the tank battery will be sampled for produced water impacts from the release.
- Three composite soil samples were collected from the surface along the diversion ditch to be analyzed for Chlorides, TPH (GRO, ORO, MRO) and BTEX. Two composite soil samples were collected from underneath the liner of the tank battery to be analyzed for Chlorides, TPH (GRO, DRO, ORO) and BTEX. See "Map 1" below for approximate composite sampling locations. The exact points will be captured with GPS and coordinates noted in the Sampling Analysis Summary.
- A produced water sample was collected from the production tanks to be analyzed for TDS.
- Additional excavation and sampling may be conducted as-needed if impacts at the surface are found to be elevated.
- b. Background sampling:
 - A background soil sample will be collected to be analyzed for Chlorides, TPH (GRO, DRO, ORO) and BTEX.
- c. Sampling criteria for ≤50' to groundwater as outlined in Table 1 of 19.15.29.11 will be used.
- d. Sample coordinates:
 - See attached Sampling Analysis Summary.
- e. Analytical results:
 - See attached Sampling Analysis Summary.
- f. See attached map for approximate sample locations.
- 4. Remediation Techniques and Methods:
 - a. Not Applicable: Initial sampling found no impacts above regulatory limits.
 - b. If samples are below regulatory limits at the surface, a request for closure will be submitted.
- 5. Long-Term Monitoring & Treatment
 - a. Not Applicable: Monitoring and treatment is not anticipated but the incident will be documented and revisited at P&A.
- 6. Confirmation sampling
 - a. Not Applicable: Initial sampling found no impacts above regulatory limits.
- 7. Reclamation of Disturbed Area
 - a. Not Applicable: No areas disturbed requiring reclamation.
- 8. Timeframes
 - a. Spill Characterization and Remediation Plan and closure to be completed by April 12, 2024. If needed, extensions may be requested.
- 9. Summary: The produced water released into the tank battery on January 15, 2024 was diluted with snowmelt already contained within the tank battery and a large portion of that water was recovered via vac truck later that day and more was subsequently pulled as it thawed. Upon inspection of the liner, several very small holes were observed that prompted further investigation into potential impacts to the surrounding area. Direction of flow of any fluids having migrated through the liner would generally flow into the diversion ditch directly behind the tank battery (South) and then to the rock rundown in the Southwest corner of the pad. Samples collected from underneath the lined tank battery and along the diversion ditch revealed no impacts above the most stringent regulatory limits (≤ 50' to groundwater) and of that which was detected, was relatively minor. Therefore, Red Willow is requesting closure on this release incident.

of Release in Lined Steel Containment Ring Known Extent NC Ute 23D #2H Tank Battery East Diversion #1 Potential Area Impacted by Release Permeating Through Liner **Fank Battery** West Diversion #2 Approximate Soil Sample Points Diversion #3 hlorides, TPH, BTEX & Benzene)

Map #1 – Horizontal Spill Extent and Sample Locations

3u of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA, 3 2,257 Scale 1: X 299496,21076 Y 4097060,06720 UTM Zone 13, NAD83 ▲

Map #2 - Distance to Live Water

Map #3 – Distance to Nearest Water Well

Well Constructed 256417-

Description

Receipt = 0522669

Permit = 256417-

Well Name =

Applicant = MEIER GALLIKER MONIKA

Case No =

Aquifers = ALL UNNAMED AQUIFERS

Uses = Domestic

Yield = 14

Well Depth = 140

Location Accuracy = Spotted from section lines

Sample Analysis Summary Table

NC Ute 23D-2H (nAPP2401640502) Initial Sampling Analytical Results Summary

Pacalina Water Cample	Sample	EC	рН	TDS
Baseline Water Sample	Date	(mmhos/cm)	(pH Units)	(mg/L)
Produced Water	3/1/2024	11	7.80	6,580

Chloride Soil Sample ID	Sample Date	Chloride (mg/kg)
Tank Battery - West	3/1/2024	93.8
Tank Battery - East	3/1/2024	105
Diversion #1	3/1/2024	N/D
Diversion #2	3/1/2024	56.2
Diversion #3	3/1/2024	29.4
Background	3/1/2024	N/D
19.15.29 Table	<600 mg/kg	

"TPH" Soil	Sample	GRO (C6-C10)	DRO (C10-C28)	EXT DRO (C28-C36)	Total
Sample ID	Date	mg/kg	mg/kg	mg/kg	TOLAT
Tank Battery - West	3/1/2024	N/D	N/D	N/D	N/D
Tank Battery - East	3/1/2024	N/D	N/D	N/D	N/D
Diversion #1	3/1/2024	N/D	N/D	N/D	N/D
Diversion #2	3/1/2024	N/D	N/D	N/D	N/D
Diversion #3	3/1/2024	N/D	N/D	N/D	N/D
Background	3/1/2024	22.3	N/D	N/D	22.3
19.15.29 Table	e 1 Standards			_	Total <100 mg/kg

BTEX Soil Sample ID	Sample Date	Benzene	Toluene	Ethylbenzene	Xylenes	Total
Tank Battery - West	3/1/2024	N/D	N/D	N/D	N/D	N/D
Tank Battery - East	3/1/2024	N/D	0.93	0.23	2.56	3.72
Diversion #1	3/1/2024	N/D	0.10	0.05	0.41	0.56
Diversion #2	3/1/2024	N/D	N/D	N/D	N/D	N/D
Diversion #3	3/1/2024	N/D	N/D	N/D	N/D	N/D
Background	3/1/2024	N/D	N/D	N/D	N/D	N/D
19.15.29 Tabl	e 1 Standards	<10 mg/kg				Total <50 mg/kg

Sample Coordinates							
Sample ID	Longitude						
Tank Battery - West	3/1/2024	36.998770	-107.252792				
Tank Battery - East	3/1/2024	36.998713	-107.252670				
Diversion #1	3/1/2024	36.998657	-107.252784				
Diversion #2	3/1/2024	36.998736	-107.252966				
Diversion #3	3/1/2024	36.998814	-107.253067				
Background	3/1/2024	36.998692	-107.253256				

Soil Map Unit Description Pages

Carson National Forest, New Mexico, Part of Rio Arriba County ByB—Bayfield silty clay loam, 1 to 3 percent slopes Map Unit Setting

National map unit symbol: 2vd1m Elevation: 6,000 to 7,000 feet

Mean annual precipitation: 13 to 15 inches Mean annual air temperature: 45 to 50 degrees F

Frost-free period: 110 to 130 days

Farmland classification: Prime farmland if irrigated

Map Unit Composition

Bayfield and similar soils: 90 percent Minor components: 10 percent

Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Bayfield

Setting

Landform: Valley flats

Landform position (three-dimensional): Base slope

Down-slope shape: Linear Across-slope shape: Linear

Parent material: Alluvium derived from sandstone and shale

Typical profile

A1 - 0 to 2 inches: silty clay loam
A2 - 2 to 4 inches: silty clay loam
Bw1 - 4 to 8 inches: silty clay loam
Bw2 - 8 to 15 inches: silty clay loam
Bw3 - 15 to 20 inches: silty clay loam
C1 - 20 to 35 inches: silty clay
C2 - 35 to 48 inches: silty clay loam
C3 - 48 to 60 inches: silty clay loam

Properties and qualities

Slope: 1 to 3 percent

Depth to restrictive feature: More than 80 inches

Drainage class: Well drained

Capacity of the most limiting layer to transmit water (Ksat): Very low

to moderately low (0.00 to 0.07 in/hr)

Depth to water table: More than 80 inches

Frequency of flooding: None Frequency of ponding: None

Calcium carbonate, maximum content: 5 percent

Gypsum, maximum content: 2 percent

Maximum salinity: Very slightly saline to moderately saline (2.0 to

8.0 mmhos/cm)

Sodium adsorption ratio, maximum: 20.0

Available water supply, 0 to 60 inches: High (about 9.9 inches)

Carson National Forest, New Mexico, Part of Rio Arriba County VgA—Vigil very gravelly loamy fine sand, 0 to 3 percent slopes Map Unit Setting

National map unit symbol: 2tl88 Elevation: 6,000 to 7,700 feet

Mean annual precipitation: 13 to 20 inches Mean annual air temperature: 44 to 50 degrees F

Frost-free period: 100 to 125 days

Farmland classification: Not prime farmland

Map Unit Composition

Vigil and similar soils: 80 percent Minor components: 20 percent

Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Vigil

Setting

Landform: Flood-plain steps

Landform position (three-dimensional): Tread

Down-slope shape: Linear Across-slope shape: Linear Parent material: Alluvium

Typical profile

A - 0 to 3 inches: very gravelly loamy fine sand C1 - 3 to 18 inches: extremely gravelly loamy sand C2 - 18 to 68 inches: extremely cobbly loamy sand C3 - 68 to 80 inches: extremely cobbly loamy sand

Properties and qualities

Slope: 0 to 3 percent

Surface area covered with cobbles, stones or boulders: 0.0 percent

Depth to restrictive feature: More than 80 inches

Drainage class: Moderately well drained

Capacity of the most limiting layer to transmit water (Ksat): High to

very high (7.09 to 21.26 in/hr)

Depth to water table: About 30 to 70 inches

Frequency of flooding: Rare Frequency of ponding: None

Available water supply, 0 to 60 inches: Very low (about 1.9 inches)

Interpretive groups

Land capability classification (irrigated): None specified

Land capability classification (nonirrigated): 6e

Hydrologic Soil Group: A

Ecological site: R036XC013UT - Southwestern Plateau Riparian Complex Intermittent (Valley Type IV - F4/B4C Stream Type) Other vegetative classification: RIVER BOTTOM (048AY236CO)

Hydric soil rating: No

Laboratory Analytical Data

Report to:
Brian Conner







5796 U.S. Hwy 64 Farmington, NM 87401

Phone: (505) 632-1881 Envirotech-inc.com





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Practical Solutions for a Better Tomorrow

Analytical Report

Red Willow Production Co.

Project Name: NC Ute 23D-2H

Work Order: E403014

Job Number: 09078-0006

Received: 3/1/2024

Revision: 2

Report Reviewed By:

Walter Hinchman Laboratory Director 3/8/24

Envirotech Inc. certifies the test results meet all requirements of TNI unless noted otherwise.

Statement of Data Authenticity: Envirotech Inc, attests the data reported has not been altered in any way.

Partial or incomplete reproduction of this report is prohibited, unless approved by Envirotech Inc.

Envirotech Inc, holds the Utah TNI certification NM00979 for data reported.

Envirotech Inc, holds the Texas TNI certification T104704557 for data reported.

Date Reported: 3/8/24

Brian Conner PO Box 737 Ignacio, CO 81137

Project Name: NC Ute 23D-2H

Workorder: E403014

Date Received: 3/1/2024 2:11:00PM

Brian Conner,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 3/1/2024 2:11:00PM, under the Project Name: NC Ute 23D-2H.

The analytical test results summarized in this report with the Project Name: NC Ute 23D-2H apply to the individual samples collected, identified and submitted bearing the project name on the enclosed chain-of-custody. Subcontracted sample analyses not conducted by Envirotech, Inc., are attached in full as issued by the subcontract laboratory.

Please review the Chain-of-Custody (COC) and Sample Receipt Checklist (SRC) for any issues reguarding sample receipt temperature, containers, preservation etc. To best understand your test results, review the entire report summarizing your sample data and the associated quality control batch data.

All reported data in this analytical report were analyzed according to the referenced method(s) and are in compliance with the latest NELAC/TNI standards, unless otherwise noted. Samples or analytical quality control parameters not meeting specific QC criteria are qualified with a data flag. Data flag definitions are located in the Notes and Definitions section of this analytical report.

If you have any questions concerning this report, please feel free to contact Envirotech, Inc.

Respectfully,

Walter Hinchman

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Sample Summary

Red Willow Production Co.	Project Name:	NC Ute 23D-2H	Donoutoda
PO Box 737	Project Number:	09078-0006	Reported:
Ignacio CO, 81137	Project Manager:	Brian Conner	03/08/24 17:38

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
Background	E403014-01A	Soil	03/01/24	03/01/24	Glass Jar, 4 oz.
Diversion #1	E403014-02A	Soil	03/01/24	03/01/24	Glass Jar, 4 oz.
	E403014-02B	Soil	03/01/24	03/01/24	Glass Jar, 4 oz.
Diversion #2	E403014-03A	Soil	03/01/24	03/01/24	Glass Jar, 4 oz.
	E403014-03B	Soil	03/01/24	03/01/24	Glass Jar, 4 oz.
Diversion #3	E403014-04A	Soil	03/01/24	03/01/24	Glass Jar, 4 oz.
	E403014-04B	Soil	03/01/24	03/01/24	Glass Jar, 4 oz.
Tank Battery -West	E403014-05A	Soil	03/01/24	03/01/24	Glass Jar, 4 oz.
	E403014-05B	Soil	03/01/24	03/01/24	Glass Jar, 4 oz.
Tank Battery -East	E403014-06A	Soil	03/01/24	03/01/24	Glass Jar, 4 oz.
	E403014-06B	Soil	03/01/24	03/01/24	Glass Jar, 4 oz.
Produced Water	E403014-07A	Aqueous	03/01/24	03/01/24	Poly 500mL



Red Willow Production Co.	Project Name:	NC Ute 23D-2H	
PO Box 737	Project Number:	09078-0006	Reported:
Ignacio CO, 81137	Project Manager:	Brian Conner	3/8/2024 5:38:58PM

Background E403014-01

		2.0001.01					
Analyte	Result	Reporting Limit		ution	Prepared	Analyzed	Notes
Allalyte	Result	Liiiit	Dii	ution	Trepared	Anaryzeu	Notes
Volatile Organic Compounds by EPA 8260B	mg/kg	mg/kg		Analyst	: RKS		Batch: 2410022
Benzene	ND	0.0250		1	03/04/24	03/06/24	
Ethylbenzene	ND	0.0250		1	03/04/24	03/06/24	
Toluene	ND	0.0250		1	03/04/24	03/06/24	
o-Xylene	ND	0.0250		1	03/04/24	03/06/24	
p,m-Xylene	ND	0.0500		1	03/04/24	03/06/24	
Total Xylenes	ND	0.0250		1	03/04/24	03/06/24	
Surrogate: Bromofluorobenzene		105 %	70-130		03/04/24	03/06/24	
Surrogate: 1,2-Dichloroethane-d4		101 %	70-130		03/04/24	03/06/24	
Surrogate: Toluene-d8		97.7 %	70-130		03/04/24	03/06/24	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg		Analyst: RKS			Batch: 2410022
Gasoline Range Organics (C6-C10)	22.3	20.0		1	03/04/24	03/06/24	
Surrogate: Bromofluorobenzene		105 %	70-130		03/04/24	03/06/24	
Surrogate: 1,2-Dichloroethane-d4		101 %	70-130		03/04/24	03/06/24	
Surrogate: Toluene-d8		97.7 %	70-130		03/04/24	03/06/24	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg		Analyst	: KM		Batch: 2410073
Diesel Range Organics (C10-C28)	ND	25.0		1	03/07/24	03/07/24	
Oil Range Organics (C28-C36)	ND	50.0		1	03/07/24	03/07/24	
Surrogate: n-Nonane		100 %	50-200		03/07/24	03/07/24	
Anions by EPA 300.0/9056A	mg/kg	mg/kg		Analyst	: DT		Batch: 2410051
Chloride	ND	20.0	<u> </u>	1	03/05/24	03/05/24	



Red Willow Production Co.Project Name:NC Ute 23D-2HPO Box 737Project Number:09078-0006Reported:Ignacio CO, 81137Project Manager:Brian Conner3/8/2024 5:38:58PM

Diversion #1 E403014-02

		Reporting					
Analyte	Result	Limit	Dilu	ıtion	Prepared	Analyzed	Notes
Volatile Organic Compounds by EPA 8260B	mg/kg	mg/kg		Analyst:	RKS		Batch: 2410022
Benzene	ND	0.0250	1	1	03/04/24	03/07/24	
Ethylbenzene	0.0495	0.0250	1	1	03/04/24	03/07/24	
Toluene	0.101	0.0250	1	1	03/04/24	03/07/24	
o-Xylene	0.0880	0.0250	1	1	03/04/24	03/07/24	
p,m-Xylene	0.320	0.0500	1	1	03/04/24	03/07/24	
Total Xylenes	0.408	0.0250	1	1	03/04/24	03/07/24	
Surrogate: Bromofluorobenzene		97.2 %	70-130		03/04/24	03/07/24	
Surrogate: 1,2-Dichloroethane-d4		97.7 %	70-130		03/04/24	03/07/24	
Surrogate: Toluene-d8		109 %	70-130		03/04/24	03/07/24	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg		Analyst:	RKS		Batch: 2410022
Gasoline Range Organics (C6-C10)	ND	20.0	1	1	03/04/24	03/07/24	
Surrogate: Bromofluorobenzene		97.2 %	70-130		03/04/24	03/07/24	
Surrogate: 1,2-Dichloroethane-d4		97.7 %	70-130		03/04/24	03/07/24	
Surrogate: Toluene-d8		109 %	70-130		03/04/24	03/07/24	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg		Analyst:	KM		Batch: 2410073
Diesel Range Organics (C10-C28)	ND	25.0	1	1	03/07/24	03/07/24	
Oil Range Organics (C28-C36)	ND	50.0	1	1	03/07/24	03/07/24	
Surrogate: n-Nonane		101 %	50-200		03/07/24	03/07/24	
Anions by EPA 300.0/9056A	mg/kg	mg/kg		Analyst:	DT		Batch: 2410051
Chloride	ND	20.0	1	1	03/05/24	03/05/24	

Red Willow Production Co.Project Name:NC Ute 23D-2HPO Box 737Project Number:09078-0006Reported:Ignacio CO, 81137Project Manager:Brian Conner3/8/2024 5:38:58PM

Diversion #2 E403014-03

		Reporting					
Analyte	Result	Limit	Dilu	ıtion	Prepared	Analyzed	Notes
Volatile Organic Compounds by EPA 8260B	mg/kg	mg/kg		Analyst: RK	KS .		Batch: 2410022
Benzene	ND	0.0250	1	I	03/04/24	03/07/24	
Ethylbenzene	ND	0.0250	1	1	03/04/24	03/07/24	
Toluene	ND	0.0250	1	1	03/04/24	03/07/24	
o-Xylene	ND	0.0250	1	1	03/04/24	03/07/24	
p,m-Xylene	ND	0.0500	1	1	03/04/24	03/07/24	
Total Xylenes	ND	0.0250	1	1	03/04/24	03/07/24	
Surrogate: Bromofluorobenzene		96.8 %	70-130		03/04/24	03/07/24	
Surrogate: 1,2-Dichloroethane-d4		104 %	70-130		03/04/24	03/07/24	
Surrogate: Toluene-d8		107 %	70-130		03/04/24	03/07/24	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg		Analyst: RK	KS .		Batch: 2410022
Gasoline Range Organics (C6-C10)	ND	20.0	1	1	03/04/24	03/07/24	
Surrogate: Bromofluorobenzene		96.8 %	70-130		03/04/24	03/07/24	
Surrogate: 1,2-Dichloroethane-d4		104 %	70-130		03/04/24	03/07/24	
Surrogate: Toluene-d8		107 %	70-130		03/04/24	03/07/24	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg		Analyst: KN	М		Batch: 2410073
Diesel Range Organics (C10-C28)	ND	25.0	1	1	03/07/24	03/07/24	_
Oil Range Organics (C28-C36)	ND	50.0	1	1	03/07/24	03/07/24	
Surrogate: n-Nonane		95.9 %	50-200		03/07/24	03/07/24	
Anions by EPA 300.0/9056A	mg/kg	mg/kg		Analyst: DT	Γ		Batch: 2410051
Chloride	56.2	20.0	1	1	03/05/24	03/05/24	

Red Willow Production Co.Project Name:NC Ute 23D-2HPO Box 737Project Number:09078-0006Reported:Ignacio CO, 81137Project Manager:Brian Conner3/8/20245:38:58PM

Diversion #3 E403014-04

		Reporting				
Analyte	Result	Limit	Dilut	ion Prepared	Analyzed	Notes
Volatile Organic Compounds by EPA 8260B	mg/kg	mg/kg	Α	Analyst: RKS		Batch: 2410022
Benzene	ND	0.0250	1	03/04/24	03/07/24	
Ethylbenzene	ND	0.0250	1	03/04/24	03/07/24	
Toluene	ND	0.0250	1	03/04/24	03/07/24	
o-Xylene	ND	0.0250	1	03/04/24	03/07/24	
p,m-Xylene	ND	0.0500	1	03/04/24	03/07/24	
Total Xylenes	ND	0.0250	1	03/04/24	03/07/24	
Surrogate: Bromofluorobenzene		99.3 %	70-130	03/04/24	03/07/24	
Surrogate: 1,2-Dichloroethane-d4		99.1 %	70-130	03/04/24	03/07/24	
Surrogate: Toluene-d8		99.4 %	70-130	03/04/24	03/07/24	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Α	Analyst: RKS		Batch: 2410022
Gasoline Range Organics (C6-C10)	ND	20.0	1	03/04/24	03/07/24	
Surrogate: Bromofluorobenzene		99.3 %	70-130	03/04/24	03/07/24	
Surrogate: 1,2-Dichloroethane-d4		99.1 %	70-130	03/04/24	03/07/24	
Surrogate: Toluene-d8		99.4 %	70-130	03/04/24	03/07/24	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Α	Analyst: KM		Batch: 2410073
Diesel Range Organics (C10-C28)	ND	25.0	1	03/07/24	03/07/24	
Oil Range Organics (C28-C36)	ND	50.0	1	03/07/24	03/07/24	
Surrogate: n-Nonane		93.4 %	50-200	03/07/24	03/07/24	
Anions by EPA 300.0/9056A	mg/kg	mg/kg	A	Analyst: DT		Batch: 2410051
Chloride	29.4	20.0	1	03/05/24	03/05/24	

 Red Willow Production Co.
 Project Name:
 NC Ute 23D-2H

 PO Box 737
 Project Number:
 09078-0006
 Reported:

 Ignacio CO, 81137
 Project Manager:
 Brian Conner
 3/8/2024
 5:38:58PM

Tank Battery -West E403014-05

		E 100 01 1 00					
Analyte	Result	Reporting Limit	Dilut	tion Pre	pared	Analyzed	Notes
Volatile Organic Compounds by EPA 8260B	mg/kg	mg/kg	A	Analyst: RKS		·	Batch: 2410022
Benzene	ND	0.0250	1	03/0	04/24	03/07/24	
Ethylbenzene	ND	0.0250	1	03/0	04/24	03/07/24	
Toluene	ND	0.0250	1	03/0	04/24	03/07/24	
o-Xylene	ND	0.0250	1	03/0	04/24	03/07/24	
p,m-Xylene	ND	0.0500	1	03/0	04/24	03/07/24	
Total Xylenes	ND	0.0250	1	03/0	04/24	03/07/24	
Surrogate: Bromofluorobenzene		102 %	70-130	03/0	04/24	03/07/24	
Surrogate: 1,2-Dichloroethane-d4		97.5 %	70-130	03/0	04/24	03/07/24	
Surrogate: Toluene-d8		102 %	70-130	03/0	04/24	03/07/24	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	A	Analyst: RKS			Batch: 2410022
Gasoline Range Organics (C6-C10)	ND	20.0	1	03/0	04/24	03/07/24	
Surrogate: Bromofluorobenzene		102 %	70-130	03/0	04/24	03/07/24	
Surrogate: 1,2-Dichloroethane-d4		97.5 %	70-130	03/0	04/24	03/07/24	
Surrogate: Toluene-d8		102 %	70-130	03/0	04/24	03/07/24	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	A	Analyst: KM			Batch: 2410073
Diesel Range Organics (C10-C28)	ND	25.0	1	03/0	07/24	03/07/24	-
Oil Range Organics (C28-C36)	ND	50.0	1	03/0	07/24	03/07/24	
Surrogate: n-Nonane		99.2 %	50-200	03/0	07/24	03/07/24	
Anions by EPA 300.0/9056A	mg/kg	mg/kg	A	Analyst: DT			Batch: 2410051
Chloride	93.8	20.0	1	03/0	05/24	03/05/24	



Red Willow Production Co.Project Name:NC Ute 23D-2HPO Box 737Project Number:09078-0006Reported:Ignacio CO, 81137Project Manager:Brian Conner3/8/2024 5:38:58PM

Tank Battery -East E403014-06

		E403014-00					
		Reporting					
Analyte	Result	Limit	Dilu	ıtion	Prepared	Analyzed	Notes
Volatile Organic Compounds by EPA 8260B	mg/kg	mg/kg		Analyst:	RKS		Batch: 2410022
Benzene	ND	0.0250	1	1	03/04/24	03/07/24	
Ethylbenzene	0.231	0.0250	1	1	03/04/24	03/07/24	
Toluene	0.930	0.0250	1	1	03/04/24	03/07/24	
o-Xylene	0.751	0.0250	1	1	03/04/24	03/07/24	
p,m-Xylene	1.81	0.0500	1	1	03/04/24	03/07/24	
Total Xylenes	2.56	0.0250	1	1	03/04/24	03/07/24	
Surrogate: Bromofluorobenzene		100 %	70-130		03/04/24	03/07/24	
Surrogate: 1,2-Dichloroethane-d4		101 %	70-130		03/04/24	03/07/24	
Surrogate: Toluene-d8		105 %	70-130		03/04/24	03/07/24	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg		Analyst:	RKS		Batch: 2410022
Gasoline Range Organics (C6-C10)	ND	20.0	1	1	03/04/24	03/07/24	
Surrogate: Bromofluorobenzene		100 %	70-130		03/04/24	03/07/24	
Surrogate: 1,2-Dichloroethane-d4		101 %	70-130		03/04/24	03/07/24	
Surrogate: Toluene-d8		105 %	70-130		03/04/24	03/07/24	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg		Analyst:	KM		Batch: 2410073
Diesel Range Organics (C10-C28)	ND	25.0	1	1	03/07/24	03/07/24	
Oil Range Organics (C28-C36)	ND	50.0	1	1	03/07/24	03/07/24	
Surrogate: n-Nonane		99.5 %	50-200		03/07/24	03/07/24	
Anions by EPA 300.0/9056A	mg/kg	mg/kg		Analyst:	DT		Batch: 2410051
Chloride	105	20.0	1	1	03/05/24	03/05/24	



Red Willow Production Co.	Project Name:	NC Ute 23D-2H	
PO Box 737	Project Number:	09078-0006	Reported:
Ignacio CO, 81137	Project Manager:	Brian Conner	3/8/2024 5:38:58PM

Produced Water

E403014-07

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Wet Chem/Gravimetric by SM2540C	mg/L	mg/L	Analys	st: JL		Batch: 2410016
Total Dissolved Solids	6580	20.0	1	03/04/24	03/07/24	
Wet Chemistry by 9040C/4500H+B	pH Units	pH Units	Analys	st: DT		Batch: 2410083
рН @25°C	7.80		1	03/07/24 12:52	03/07/24 13:40	Н5
Wet Chemistry by 9050A/2510B	uS/cm	uS/cm	Analys	st: BA		Batch: 2410066
Specific Conductance (@ 25 C)	11000	10.0	1	03/06/24	03/06/24	



QC Summary Data

Red Willow Production Co. NC Ute 23D-2H Project Name: Reported: PO Box 737 Project Number: 09078-0006 Ignacio CO, 81137 Project Manager: Brian Conner 3/8/2024 5:38:58PM Volatile Organic Compounds by EPA 8260B Analyst: Spike Source RPD Reporting Rec Analyte Result Limit Level Result Rec Limits RPD Limit mg/kg mg/kg mg/kg mg/kg % % % Notes Blank (2410022-BLK1) Prepared: 03/04/24 Analyzed: 03/06/24 ND 0.0250 ND Ethylbenzene 0.0250 ND Toluene 0.0250 ND 0.0250 o-Xylene ND p,m-Xylene 0.0500 Total Xylenes ND 0.0250 Surrogate: Bromofluorobenzene 0.490 0.500 98.0 70-130 Surrogate: 1,2-Dichloroethane-d4 0.493 0.500 98.6 70-130 0.500 110 70-130 Surrogate: Toluene-d8 0.551 LCS (2410022-BS1) Prepared: 03/04/24 Analyzed: 03/06/24 2.56 0.0250 2.50 102 70-130 Benzene 70-130 2.50 2.50 100 0.0250 Ethylbenzene Toluene 3.06 0.0250 2.50 122 70-130 2.26 2.50 90.5 70-130 0.0250 o-Xylene 90.6 4.53 5.00 70-130 p,m-Xylene 0.0500 6.79 0.0250 7.50 90.6 70-130 Total Xylenes Surrogate: Bromofluorobenzene 0.518 0.500 104 70-130 0.494 0.500 98.8 70-130 Surrogate: 1,2-Dichloroethane-d4 Surrogate: Toluene-d8 0.500 70-130 0.599

Matrix Spike (2410022-MS1)				Source:	E403015-	01	Prepared: 03/04/24 Analyzed: 03/06/24
Benzene	2.54	0.0250	2.50	ND	101	48-131	
Ethylbenzene	2.53	0.0250	2.50	ND	101	45-135	
Toluene	2.75	0.0250	2.50	ND	110	48-130	
o-Xylene	2.39	0.0250	2.50	ND	95.6	43-135	
p,m-Xylene	4.79	0.0500	5.00	ND	95.9	43-135	
Total Xylenes	7.18	0.0250	7.50	ND	95.8	43-135	
Surrogate: Bromofluorobenzene	0.488		0.500		97.6	70-130	
Surrogate: 1,2-Dichloroethane-d4	0.515		0.500		103	70-130	
Surrogate: Toluene-d8	0.533		0.500		107	70-130	
9							

Matrix Spike Dup (2410022-MSD1)				Source: E403015-01			Prepared: 03/04/24 Analyzed: 03/06/24		
Benzene	2.39	0.0250	2.50	ND	95.5	48-131	6.13	23	
Ethylbenzene	2.46	0.0250	2.50	ND	98.5	45-135	2.55	27	
Toluene	2.50	0.0250	2.50	ND	100	48-130	9.35	24	
o-Xylene	2.53	0.0250	2.50	ND	101	43-135	5.81	27	
p,m-Xylene	5.07	0.0500	5.00	ND	101	43-135	5.71	27	
Total Xylenes	7.61	0.0250	7.50	ND	101	43-135	5.74	27	
Surrogate: Bromofluorobenzene	0.500		0.500		100	70-130			
Surrogate: 1,2-Dichloroethane-d4	0.472		0.500		94.4	70-130			
Surrogate: Toluene-d8	0.490		0.500		98.0	70-130			



Total Dissolved Solids

QC Summary Data

Red Willow Production Co. PO Box 737	Project Name: Project Number:	NC Ute 23D-2H 09078-0006	Reported:
Ignacio CO, 81137	Project Manager:	Brian Conner	3/8/2024 5:38:58PM

Ignacio CO, 81137		Project Manage	r: Br	rian Conner				3/8	3/2024 5:38:58PM
		Wet Chem/	Gravimeti	ric by SM2	540C				Analyst: JL
Analyte	Result mg/L	Reporting Limit mg/L	Spike Level mg/L	Source Result mg/L	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
Blank (2410016-BLK1)							Prepared: 0	3/04/24 Analy	yzed: 03/07/24
Total Dissolved Solids	ND	10.0							
LCS (2410016-BS1)							Prepared: 0	3/04/24 Analy	yzed: 03/07/24
Total Dissolved Solids	83.0	10.0	100		83.0	55-134			
Duplicate (2410016-DUP1)				Source:	E403014-	07	Prepared: 0	3/04/24 Analy	vzed: 03/07/24

6420

20.0



QC Summary Data

Red Willow Production Co.	Project Name:	NC Ute 23D-2H	Reported:
PO Box 737	Project Number:	09078-0006	
Ignacio CO, 81137	Project Manager:	Brian Conner	3/8/2024 5:38:58PM

Wet Chemistry by 9040C/4500H+B

Analyst: DT

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	
	pH Units	pH Units	pH Units	pH Units	%	%	%	%	Notes

LCS (2410083-BS1)				Prepared: 0	3/07/24 Analyzed: 03/07/24
pH	7.96	8.00	99.7 98.7	5-101.25	
Duplicate (2410083-DUP1)			Source: E403014-07	Prepared: 0	3/07/24 Analyzed: 03/07/24
nU	7 74		7.80	0.772	20



Specific Conductance (@ 25 C)

QC Summary Data

Red Willow Production Co. PO Box 737	Project Name: Project Number:	NC Ute 23D-2H 09078-0006	Reported:
Ignacio CO, 81137	Project Manager:	Brian Conner	3/8/2024 5:38:58PM

		Wet Che	mistry by	9050A/251	0B				Analyst: BA
Analyte	Result uS/cm	Reporting Limit uS/cm	Spike Level uS/cm	Source Result uS/cm	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
Blank (2410066-BLK1) Specific Conductance (@ 25 C)	ND	10.0				I	Prepared: 0	3/06/24 Ana	alyzed: 03/06/24

LCS (2410066-BS1)						Prepared: 03/06/24 Analyzed: 03/06/24
Specific Conductance (@ 25 C)	1390	10.0	1410	98.4	98-102	
Duplicate (2410066-DUP1)				Source: E403014-07	7	Prepared: 03/06/24 Analyzed: 03/06/24

10.0

11000

0.273

11000

Gasoline Range Organics (C6-C10)

 ${\it Surrogate: Bromofluor obenzene}$

Surrogate: Toluene-d8

QC Summary Data

NC Ute 23D-2H Red Willow Production Co. Project Name: Reported: PO Box 737 Project Number: 09078-0006 Ignacio CO, 81137 Project Manager: Brian Conner 3/8/2024 5:38:58PM

	Non	halogenated	Organics l	oy EPA 801	15D - G	RO		Α	analyst: RAS
Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
Blank (2410022-BLK1)]	Prepared: 0	3/04/24 Analy	/zed: 03/06/24
Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: Bromofluorobenzene	0.490		0.500		98.0	70-130			
Surrogate: 1,2-Dichloroethane-d4	0.493		0.500		98.6	70-130			
Surrogate: Toluene-d8	0.551		0.500		110	70-130			
LCS (2410022-BS2)]	Prepared: 0	3/04/24 Analy	zed: 03/06/24

Surrogate: Bromofluorobenzene	0.516		0.500		103	70-130	
Surrogate: 1,2-Dichloroethane-d4	0.513		0.500		103	70-130	
Surrogate: Toluene-d8	0.587		0.500		117	70-130	
Matrix Spike (2410022-MS2)				Source:	E403015-0	01	Prepared: 03/04/24 Analyzed: 03/06/24
Gasoline Range Organics (C6-C10)	55.5	20.0	50.0	ND	111	70-130	•
Surrogate: Bromofluorobenzene	0.506		0.500		101	70-130	

50.0

117

109

70-130

70-130

20.0

0.506

0.547

Surrogate: 1,2-Dichloroethane-d4	0.480		0.500		96.0	70-130			
Surrogate: Toluene-d8	0.547		0.500		109	70-130			
Matrix Spike Dup (2410022-MSD2)				Source:	E403015-0	01	Prepared: 03	3/04/24 A	nalyzed: 03/06/24
Gasoline Range Organics (C6-C10)	56.0	20.0	50.0	ND	112	70-130	0.967	20	
Surrogate: Bromofluorobenzene	0.496		0.500		99.1	70-130			
Surrogate: 1.2-Dichloroethane-d4	0.495		0.500		99.0	70-130			

0.500

QC Summary Data

Red Willow Production Co. PO Box 737	Project Name: Project Number:	NC Ute 23D-2H 09078-0006	Reported:
Ignacio CO, 81137	Project Manager:	Brian Conner	3/8/2024 5:38:58PM

ignació CO, 81137		1 Toject Ivianage	т. Бт	ian Conner					0,2021 3.30.3011
	Nonha	logenated Or	ganics by	EPA 8015I) - DRO	/ORO			Analyst: KM
Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	Notes
Blank (2410073-BLK1)							Prepared: 0	3/07/24 Ana	lyzed: 03/07/24
Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C36)	ND	50.0							
Surrogate: n-Nonane	54.2		50.0		108	50-200			
LCS (2410073-BS1)							Prepared: 0	3/07/24 Ana	lyzed: 03/07/24
Diesel Range Organics (C10-C28)	291	25.0	250		116	38-132			
Surrogate: n-Nonane	58.1		50.0		116	50-200			
Matrix Spike (2410073-MS1)				Source:	E403014-0	03	Prepared: 0	3/07/24 Ana	lyzed: 03/07/24
Diesel Range Organics (C10-C28)	287	25.0	250	ND	115	38-132			
Surrogate: n-Nonane	55.6		50.0		111	50-200			
Matrix Spike Dup (2410073-MSD1)				Source:	E403014-0	03	Prepared: 0	3/07/24 Ana	lyzed: 03/07/24
Diesel Range Organics (C10-C28)	288	25.0	250	ND	115	38-132	0.325	20	
Surrogate: n-Nonane	58.3		50.0		117	50-200			



Matrix Spike (2410051-MS1)

Matrix Spike Dup (2410051-MSD1)

Chloride

Chloride

256

257

QC Summary Data

Red Willow Production Co.		Project Name:	N	C Ute 23D-2F	ł				Reported:
PO Box 737 Ignacio CO, 81137		Project Number: Project Manager		9078-0006 rian Conner					3/8/2024 5:38:58PM
		Anions	by EPA 3	300.0/90 5 6 <i>A</i>	A				Analyst: DT
Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
Blank (2410051-BLK1)							Prepared: 0	3/05/24 A	nalyzed: 03/06/24
Chloride	ND	20.0							
LCS (2410051-BS1)							Prepared: 0	3/05/24 A	analyzed: 03/06/24
Chloride	245	20.0	250		98.1	90-110			

250

250

20.0

20.0

Source: E403009-03

Source: E403009-03

102

103

80-120

80-120

0.477

ND

ND

QC Summary Report Comment:

Calculations are based off of the raw (non-rounded) data. However, for reporting purposes all QC data is rounded to three significant figures. Therefore, hand calculated values may differ slightly.



Prepared: 03/05/24 Analyzed: 03/06/24

Prepared: 03/05/24 Analyzed: 03/06/24

20

Definitions and Notes

Red Willow Production Co.	Project Name:	NC Ute 23D-2H	
PO Box 737	Project Number:	09078-0006	Reported:
Ignacio CO, 81137	Project Manager:	Brian Conner	03/08/24 17:38

H5 pH is specified to be performed in the field within 15 minutes of sampling. The sample analysis was performed as quickly as possible.

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

RPD Relative Percent Difference

DNI Did Not Ignite

DNR Did not react with the addition of acid or base.

Note (1): Methods marked with ** are non-accredited methods.

Note (2): Soil data is reported on an "as received" weight basis, unless reported otherwise.



Client: RWPC	Bill To				la	h Us	e Onl	lv		N. S.			TA	T	EPA Pi	ogram
Project: NC Ute 231) - ZH	Attention: RWPC	L	ab W	/0#		Sav I	Job N	luml	per		1D	2D	3D	Standard	CWA	SDWA
Project Manager: Brian Conner	Address: 14933 Highway 172		ab W E 4	03	301				$-\infty$					X		
Address: 14933 Highway 172	City, State, Zip Ignacio, Co. 81137						Analy	sis an	d Me	thod						RCRA
City, State, Zip Ignacio, Co. 81137	Phone: 970-563-5100		100100				- 4		PH		Torsion .					
Phone: 970-553-9127	Email: accountspayable@rwpc.us		8015	015	1				EC,	5	0			111 d co	State	TVI
Email: bconner@rwpc.us; ehscompliance@rwpc.us Report due by:			by 8	by 8	021	9	10	0.00	-	Sen	8560h			NMI CO	UT AZ	IX
			ORO	DRO	by 8	y 82	s 60	de 3	50	2 ha	00					
Sampled Date Sampled Matrix No. of Containers Sample ID		Lab mber	DRO/ORO	GRO/DRO by 8015	BTEX by 8021	VOC by 8260	Metals 6010	Chloride 300.0	1	Be		40			Remarks	
11:00 3-1-24 S /g Backgro	lone		X	X	X			X		X						
10:30 3-1-24 5 Zg Diversion	5000000	2	X	X	X			X		X						
10:tran 3-1-29 5 Zg Diversion	#2	3	X	X	X			X		X						
10:10an 3-1-24 S 2 g Diversion		4	X	X	X			X		X						
11 2		5	X	X	X			X		X						
11-25 3-1-24 5 Zg Tank B.		6	X	X	X			X		X	100					
10:40m3-1-24 A 1 p Produced	Water	7	ľ						X			7				
										1111						
							l-m-									
Additional Instructions:													4	No. of the last of		
I, (field sampler), attest to the validity and authenticity of this sample. I am date or time of collection is considered fraud and may be grounds for legal a	ction. Sampled by:	ample loca	ation,	_										eived on ice the day °C on subsequent d		ed or received
	O 6 pm Received by: (Signature) Date 3	الا	4	ime 4	: [ı	Rece	eived	on ic	e:		ab U	se On	ly		
Relinquished by: (Signature) Date Time	Received by: (Signature) Date		-	ime			T1				T2	,		T3		
Relinquished by: (Signature) Date Time	Received by: (Signature) Date	9	7	ime				Tom	ıp °C_		4					
Sample Matrix: S - Soil, Sd - Solid, Sg - Sludge, A - Aqueous, O - Other	Con	ntainer 1	Type	0 - 0	lace	n - n/				mhe	or gla	SS V -	VOA		Commence of the Commence of th	
Note: Samples are discarded 30 days after results are reported unle														port for the anal	ysis of the a	above
samples is applicable only to those samples received by the laborato														"		

Envirotech Analytical Laboratory

Sample Receipt Checklist (SRC)

Printed: 3/4/2024 10:50:28AM

Instructions: Please take note of any NO checkmarks.

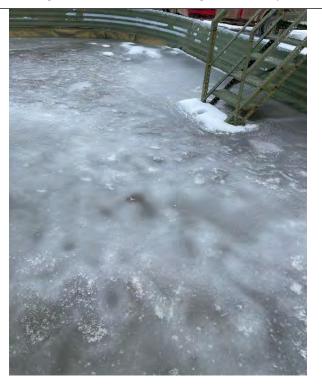
If we receive no response concerning these items within 24 hours of the date of t	this notice, all the samples will be analyzed as requested.
---	---

Date Received:	03/01/24	4:11	Work Order ID:	E403014
Date Logged In:	03/02/24	0:43	Logged In By:	Alexa Michaels
Due Date:	03/08/24	17:00 (5 day TAT)		
	Yes			
atch the COC	Yes			
	Yes	Carrier: Brian Con	ner	
ested analyses?	Yes			
	Yes		<u>Commen</u>	ts/Resolution
	Yes			
	Yes			
	Yes			
	Yes			
le temperature: 4°	<u>c</u>			
	No			
	NA			
	NA			
	NA			
rs?	Yes			
ainers collected?	Yes			
formation:				
	Yes			
nreserved?	No			
produitedi				
metals?				
	140			
	.,			
alyzed?	NA			
tory?	No			
if so who?	NA	Subcontract Lab: NA		
	Due Date: natch the COC nested analyses? I in the field, sion. C, i.e., 6°±2°C are received w/i 15	Due Date: 03/08/24 in the field, sion. Yes	Due Date: 03/08/24 17:00 (5 day TAT) Yes natch the COC Yes	Due Date: O3/08/24 17:00 (5 day TAT) Yes natch the COC Yes Yes Yes Yes Yes In the field, sion. Yes Yes Yes Yes Yes Yes Yes Yes No NA C, i.e., 6°±2°C Yes are received w/i 15 le temperature: 4°C No NA

Reportable Release Photographic Documentation

NC Ute 23D #002H (nAPP2401640502)

Frozen produced water gathered in lined steel ring tank battery.



Frozen produced water gathered in lined steel ring tank battery.



Released produced water was pulled by a vac truck; remaining ice will be pulled as it thaws.



Released produced water was pulled by a vac truck; remaining ice will be pulled as it thaws.



Looking North: Liquids and gravel were pulled from the secondary containment.



Small holes found in liner, approximately 0.5" diameter.

Small hole found in liner, approximately 0.5" diameter.



One of the holes cut into the line to collect samples from underneath the tank battery.



Sample "Diversion #2" collected from diversion ditch. Please note that the area is saturated from snowmelt coming from the North-facing slope above the diversion and is not produced water.



Sample "Diversion #1" collected from diversion ditch. Please note that the area is saturated from snowmelt coming from the North-facing slope above the diversion and is not produced water.



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

QUESTIONS

Action 325013

QUESTIONS

Operator:	OGRID:
RED WILLOW PRODUCTION COMPANY	216282
P.O. Box 369	Action Number:
Ignacio, CO 81137	325013
	Action Type:
	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2401640502
Incident Name	NAPP2401640502 NC UTE 23D #002H @ 30-039-31020
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Well	[30-039-31020] NC UTE 23D #002H

Location of Release Source		
Please answer all the questions in this group.		
Site Name	NC UTE 23D #002H	
Date Release Discovered	01/15/2024	
Surface Owner	Private	

Incident Details	
Please answer all the questions in this group.	
Incident Type	Produced Water Release
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

Nature and Volume of Release		
Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.		
Crude Oil Released (bbls) Details	Not answered.	
Produced Water Released (bbls) Details	Cause: Freeze Pump Produced Water Released: 150 BBL Recovered: 150 BBL Lost: 0 BBL.	
Is the concentration of chloride in the produced water >10,000 mg/l	No	
Condensate Released (bbls) Details	Not answered.	
Natural Gas Vented (Mcf) Details	Not answered.	
Natural Gas Flared (Mcf) Details	Not answered.	
Other Released Details	Not answered.	
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.	

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QUESTIONS, Page 2

Action 325013

QUESTIONS (continued)

Operator:	OGRID:
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	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Nature and Volume of Release (continued)		
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.	
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes	
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.	
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.		

Initial Response		
The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury.		
The source of the release has been stopped	True	
The impacted area has been secured to protect human health and the environment	True	
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True	
All free liquids and recoverable materials have been removed and managed appropriately	False	
If all the actions described above have not been undertaken, explain why	The produced water collected in a synthetically lined secondary containment and a vac truck was dispatched to recover the liquid as soon as the release was discovered. There is a volume of produced water that is frozen and not currently recoverable. Nothing has escaped secondary containment.	

Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.

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.

I hereby agree and sign off to the above statement	Name: Mitchell Morris Title: Environmental Compliance Specialist II-Air
	Email: mmorris@rwpc.us Date: 01/16/2024

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QUESTIONS, Page 3

Action 325013

QUESTIONS (continued)

Operator:	OGRID:
RED WILLOW PRODUCTION COMPANY	216282
P.O. Box 369	Action Number:
Ignacio, CO 81137	325013
	Action Type:
	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Site Characterization		
Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). 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 in feet below ground surface (ft bgs)	Between 26 and 50 (ft.)	
What method was used to determine the depth to ground water	Attached Document	
Did this release impact groundwater or surface water	No	
What is the minimum distance, between the closest lateral extents of the release ar	nd the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Between 500 and 1000 (ft.)	
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Greater than 5 (mi.)	
An occupied permanent residence, school, hospital, institution, or church	Between ½ and 1 (mi.)	
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between ½ and 1 (mi.)	
Any other fresh water well or spring	Between 1 and 5 (mi.)	
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)	
A wetland	Between 300 and 500 (ft.)	
A subsurface mine	Greater than 5 (mi.)	
An (non-karst) unstable area	Greater than 5 (mi.)	
Categorize the risk of this well / site being in a karst geology	None	
A 100-year floodplain	Between 200 and 300 (ft.)	
Did the release impact areas not on an exploration, development, production, or storage site	No	

the appropriate district office as later than 00 days often the release discourse, date		
the appropriate district office no later than 90 days after the release discovery date.		
Yes		
Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.		
Yes		
Yes		
Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.		
01/15/2024		
03/01/2024		
03/19/2024		
0		
0		
These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.		
1		

significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

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QUESTIONS, Page 4

Action 325013

QUESTIONS (continued)

Operator:	OGRID:	
RED WILLOW PRODUCTION COMPANY	216282	
P.O. Box 369	Action Number:	
Ignacio, CO 81137	325013	
	Action Type:	
	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)	
QUESTIONS		
Remediation Plan (continued)		
Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.		
This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:		
(Select all answers below that apply.)		
Is (or was) there affected material present needing to be removed	No	

Other Non-listed Remedial Process. Please specify

Removed released water with vac truck on the day of discovery. Performed initial soil sampling and results indicated all constituents below regulatory requirements.

Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.

Yes

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.

car laws and/or regulations.

OTHER (Non-listed remedial process)

I hereby agree and sign off to the above statement

Is (or was) there a power wash of the lined containment area (to be) performed

Name: Mitchell Morris

Title: Environmental Compliance Specialist II-Air

Email: mmorris@rwpc.us Date: 03/21/2024

The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

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QUESTIONS, Page 6

Action 325013

QUESTIONS (continued)

Operator:	OGRID:
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P.O. Box 369	Action Number:
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	Action Type:
	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)
QUESTIONS	

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	{Unavailable.}
Was all the impacted materials removed from the liner	Unavailable.

Remediation Closure Request		
Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.		
Requesting a remediation closure approval with this submission	Yes	
Have the lateral and vertical extents of contamination been fully delineated	Yes	
Was this release entirely contained within a lined containment area	Yes	
What was the total surface area (in square feet) remediated	0	
What was the total volume (cubic yards) remediated	0	
Summarize any additional remediation activities not included by answers (above)	No additional action necessary. Lost liquid was recovered by vac truck and soil samples are clean.	

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 (in .pdf format) 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.

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.

Name: Mitchell Morris
Title: Environmental Compliance Specialist II-Air
Email: mmorris@rwpc.us
Date: 03/21/2024

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CONDITIONS

Action 325013

CONDITIONS

Operator:	OGRID:
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P.O. Box 369	Action Number:
Ignacio, CO 81137	325013
	Action Type:
	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By		Condition Date
scott.rodgers	None	5/23/2024