



Remediation Summary and Closure Request

October 9, 2024

JR HOLT A #001
API # 30-025-05559
Historical Produced Water and
Crude Oil Release
Incident Nos.: nPRS0522047385 and
nSAD0521635557

Prepared For:

Morgan Operating, Inc.
OGRID #224367
Hobbs, New Mexico 88241

Prepared By:

Crain Environmental
2925 East 17th Street
Odessa, Texas 79761

A handwritten signature in blue ink that reads 'Cynthia K. Crain'.

Cynthia K. Crain, P.G.



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1.0 Introduction

Crain Environmental (CE), on behalf of Morgan Operating, Inc. (Morgan), has prepared this Remediation Summary and Closure Request for the produced water and crude oil release at the JR Holt A #001 (Site). The Site is in Unit Letter G (SW/NE), Section 5, Township 19 South, Range 37 East, Lea County, New Mexico at global positioning system (GPS) coordinates of 32.6913643°, -103.2714539°. The property surface rights are owned by the State of New Mexico, and land use in the Site vicinity is primarily oil and gas production and cattle grazing. The location of the Release Site is depicted on Figure 1.

2.0 Background

On July 5, 2005, Morexco, Inc. (Morexco) was the operator of the JR Holt A #001 and was notified by the New Mexico Oil Conservation Division (NMOCD) that a release had occurred at the Site. According to NMOCD records, Morexco submitted a Release Notification Report (C-141) on August 8, 2005, that reported a release of 1 barrel (bbl) of oil and stated: "Repaired flow line leak. Removed material from location & hauled to disposal. Will replace fresh soil after results of testing are received. Area is 20' x 20' area next to flow line on location pad, area around well head. Clean up is described in the above remedial action."

Incident events included in the NMOCD record also state "psheeley met on location with Donald Becker on 8/5/05. Release was barely reportable however accumulative soil impact indicates fluids in excess of 5 bbl was released over time. Rancher reported. Operator did not follow up with OCD per rule 116 until now. Remedial activities (+delineation) shall be complete by Wed 8-10-05 per Chris Williams". The release was assigned Incident # nPRS0522047385, and a copy of the C-141 was not located in the NMOCD database.

A duplicate incident is also located in the NMOCD database. NMOCD records for Incident # nSAD0521635557 indicates the second incident # was created following a site inspection by NMOCD representatives (Paul S. and Sylvia D) on August 4, 2005. Incident events included in the NMOCD record state "Paul S. called 8/5/05 spoke to Rhonda @ Morexco, requiring C-141 by 8/8/05 and clean up procedure by Wednesday 8/10/05 or will shut well in." No further information is available in the NMOCD database.

On July 28, 2005, a Notice of Violation (cLWH0520935430) was issued to Morexco by the NMOCD that noted "Mess at well head and west of well". NMOCD records show that compliance was resolved on August 2, 2005.

On July 7, 2014, the NMOCD approved a Change of Operator from Morexco to Morgan. NMOCD records show that Incident # nPRS0522047385 lists Morgan as the Operator, and Incident # nSAD0521635557 lists Morexco as the Operator.

On October 20, 2021, a field inspection was conducted by the NMOCD that noted "Sign on Well: Include full API # 30-025-05559. Label nearby storage tank. 19.15.10.8 Safety Procedures for Drilling and Production: Excess weeds. NMOCD records show that compliance was resolved on February 10, 2022.



Morgan believes that remediation was conducted at the Site prior to their ownership; however, an Investigation Summary and Closure Report was submitted to the NMOCD on August 23, 2024, that provided a summary of investigation activities conducted at the Site in accordance with 19.15.29 New Mexico Administrative Code (NMAC) and requested closure of Incident Numbers nPRS0522047385 and nSAD0521635557. Documentation of NMOCD records is provided in Appendix A.

On September 24, 2024, the NMOCD rejected the Closure Report for the following reasons:

1. Horizontal delineation submitted was incomplete and did not meet the requirements of 19.15.29.11 NMAC. The values for determination of horizontal impact are derived by either approved "background" values or Table I Closure Criteria for releases where groundwater is at a depth of 50 feet or less. Any sample exceeding approved "background" values or Table I Closure Criteria for releases where groundwater is at a depth of 50 feet or less requires additional samples for horizontal delineation. Sample 4 at 1' bgs returned laboratory analytical results above the applicable closure criteria and must be further delineated and remediated.
2. The questions located under the Site Characterization section of the digital C-141 contain incorrect information. Most of the questions were answered "Greater than 5 (mi.)". OCD has identified OSE registered wells, playas, wetlands, and a residence that are closer than 5 miles from the release site. An accurate determination of the distance from the receptors listed in the Site Characterization section of the digital C-141 must be provided.
3. All questions on the digital C-141 that refer to the estimated surface area (in square feet) and estimated volume (in cubic yards) for soils that will be remediated and reclaimed must be correctly answered after delineation of the soil above the remediation closure standards is completed.
4. Operator failed to provide proper Sampling Notification pursuant to 19.15.29.12D.(1).(a) NMAC for samples collected on 7/10/2024 and 8/2/2024 and will not be accepted as closure samples. Failure to provide proper sampling notice is a compliance issue and OCD may pursue compliance actions pursuant to 19.15.5 NMAC. Operator shall ensure future compliance with 19.15.29.12.D.(1).(a) NMAC.
5. The work performed does not meet the requirements of the OCD approved sampling plan.
6. Submit a complete report through the OCD Permitting website by 11/8/2024.

On September 9, 2024, a conference call was held with NMOCD to discuss the rejection reasons and ensure understanding of steps necessary to achieve closure of the two Incidents. In addition to information provided in the Investigation Summary and Closure Report of August 23, 2024, this Remediation Summary and Closure Request (Request) provides the following information as requested in the NMOCD rejection reasons:

1. A summary of remediation activities conducted around Sample 4 on September 25, 2024.
2. Questions located under the Site Characterization section of the digital C-141 will be revised when submitting this Request to the OCD Fee Portal.



3. Questions on the digital C-141 referring to estimated surface area and volume for remediated and/or reclaimed soils will be answered when submitting this Request to the OCD Fee Portal.
4. Sample notification was provided to the NMOCD on September 21, 2024, for each Incident.
5. It was discussed during the September 9, 2024, conference call that samples were not collected to a depth of 4' bgs (as was approved in the sampling plan) as backhoe refusal was encountered at a shallower depth at each sample location; however, vertical delineation was achieved at each sample location. Remediation is only requested at the sample S-4 location.
6. This Remediation Summary and Closure Request is being submitted prior to the due date of November 8, 2024, and again respectfully requests closure of Incident Numbers nPRS0522047385 and nSAD0521635557.

Documentation of NMOCD communication is provided in Appendix B.

3.0 NMOCD Closure Criteria

Cleanup standards for oil spills are provided in 19.15.29 NMAC. The cleanup standards (described in the rule as "Closure Criteria") are based primarily on depth to groundwater but are also based on other criteria. Three different Closure Criteria are provided in the rule. The most stringent apply to sites where groundwater is found within 50 feet of the ground surface or if the release occurred within one of the following areas:

- Within 300 feet of any continuously flowing watercourse or any other significant watercourse.
- Within 200 feet of any lakebed, sinkhole or playa lake (measured from the ordinary highwater mark).
- Within 300 feet from an occupied permanent residence, school, hospital, institution or church.
- Within 500 feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes.
- Within 1,000 feet of any fresh water well or spring.
- Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to Section 3-27-3 NMSA 1978 as amended.
- Within 300 feet of a wetland.
- Within the area overlying a subsurface mine.
- Within an unstable area such as a karst formation.
- Within a 100-year floodplain.

3.1 Groundwater Evaluation

A review of the New Mexico Office of the State Engineer (NMOSE) records indicated there are no water wells within a 0.5-mile radius of the Site; therefore, depth to groundwater is estimated to be less than 50 feet (') below ground surface (bgs). Figure 3 shows the 0.5-mile radius from the Site.



3.2 Surface Features and Other Development

CE reviewed recent aerial photographs, topographic maps, the NMOSE Point of Discharge (POD) GIS website, and information available from the Lea County, New Mexico Central Appraisal District website. As shown on Figure 1, the Site is **not** located:

- Within 300 feet of any continuously flowing watercourse or any other significant watercourse.
 - o No continuously flowing watercourses (rivers, streams, arroyos, etc.) are apparent within 300 feet of the Site in the topographic map (Figure 1).
- Within 200 feet of any lakebed, sinkhole or playa lake (measured from the ordinary highwater mark).
 - o The topographic map (Figure 1) indicates there is not a lakebed, sinkhole or playa lake located within 200 feet of the Site.
- Within 300 feet from an occupied permanent residence, school, hospital, institution, or church.
 - o The Site Location Map (Figure 1) and information available from the Lea County, New Mexico Central Appraisal District do not show or list any permanent residence, school, hospital, institution, or church located within 300 feet of the Site.
- Within 500 feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes.
 - o No wells or springs located within 500 feet of the Site appear in any of the NMOSE records reviewed by CE.
- Within 1,000 feet of any fresh water well or spring.
 - o No freshwater wells or springs located within 1,000 feet of the Site appear in any of the records reviewed by CE.
- Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to Section 3-27-3 NMSA 1978 as amended.
 - o Based on the property and other records reviewed by CE, the Site is not located in incorporated municipal boundaries or within a defined municipal fresh water well field.
- Within the area overlying a subsurface mine
 - o Based on the property and other records reviewed by CE, the Site is not located within an area overlying a subsurface mine.

3.3 Wetlands, Floodplain, and Karst Geology

A review of the United States Fish and Wildlife Service (USFWS) wetlands map indicated the Site is not located within 300 feet of a wetland. A review of the Federal Emergency Management Act (FEMA) floodplain map indicates the release at the Site is located outside of a 100-year floodplain. Finally, the New Mexico Bureau of Land Management (BLM) karst potential map indicates the Site is located within a "low karst potential" area. Figures 4, 5, and 6 depict the USFWS wetlands information, FEMA floodplain information, and the karst potential data, respectively.



3.4 Closure Criteria Applicable to the Site

As depth to groundwater is estimated to be less than 50' bgs, the most stringent Closure Criteria will apply. A summary of the Closure Criteria is provided in the table below and in Table 1.

NMOCD Closure Criteria

Constituent of Concern		Closure Criteria Based on Depth to Groundwater (mg/kg)		
		≤ 50 feet bgs	51 feet to 100 feet bgs	> 100 feet bgs
Chloride (EPA 300)		600	10,000	20,000
TPH (EPA 8015M)	GRO + DRO + MRO	100	2,500	2,500
	GRO + DRO	NA	1,000	1,000
Total BTEX (EPA 8021 or 8260)		50	50	50
Benzene (EPA 8021 or 8260)		10	10	10

Notes: NA = not applicable
 bgs = below ground surface
 mg/kg = milligrams per kilogram
 GRO = gasoline range organics
 DRO = diesel range organics
 MRO = motor oil range organics
 TPH = total petroleum hydrocarbons
 BTEX = benzene, toluene, ethylbenzene, and total xylenes
Green highlighted cells denote applicable Closure Criteria.

4.0 Site Assessment/Characterization Results

As per 19.15.29.11 NMAC, a Site Characterization Report will have the components described in Sections 4.1 through 4.5 of this document.

4.1 Site Map

As required by 19.15.29.11 NMAC, a scaled diagram showing significant Site infrastructure, sample point locations, and known subsurface features such as utilities is provided as Figure 2.

4.2 Depth to Groundwater

As discussed in Section 3.1, no water wells are located within a 0.5-mile radius of the Site; therefore, depth to groundwater at the Site is estimated to be less than 50' bgs.

4.3 Wellhead Protection Area

The 0.5-mile wellhead protection area is shown on Figure 3. As listed in the NMOSE database, there are no water wells within a 0.5-mile radius of the Site; therefore, depth to groundwater is estimated to be less than 50' bgs. There were no water sources, springs, or other sources of freshwater extraction identified within 0.5-mile of the Site.



4.4 Distance to Nearest Significant Watercourse

The horizontal distance to the nearest significant watercourse as defined in Subsection P of 19.15.17.7 NMAC is greater than 0.5-mile from the Site.

5.0 Summary of Delineation Activities

On August 1, 2024, CE contacted NMOCD (Brittany Hall) to discuss the procedure for obtaining closure of both incidents. Ms. Hall requested a sampling plan prior to conducting a soil investigation. A plan was submitted to Ms. Hall via email and was approved on August 2, 2024. Appendix B provides records of NMOCD communication.

On July 10, 2024, soil samples (SURFACE and 1 FT) were collected adjacent to the release point using a hand auger. This sample location is also identified as Sample 1. On August 2, 2024, soil samples (Sample 2 and Sample 3) were collected at a depth of 1' bgs with a hand auger. On August 7, 2024, soil samples (S-1 2FT, S-2 2FT, S-3 2FT, S-3 30 INCHES, S-4 1FT, and S-4 2FT) were collected using a backhoe. Backhoe refusal due to hard rock conditions was encountered in Sample 1, Sample 2, and Sample 4 at a depth of 2' bgs, and in Sample 3 at a depth of 30" bgs.

All samples were placed in laboratory prepared containers, properly labeled, immediately placed on ice, and hand delivered to Cardinal Laboratories (Cardinal) in Hobbs, New Mexico for analysis of total petroleum hydrocarbons (TPH) by EPA Method 8015 Modified, benzene, toluene, ethylbenzene, and xylenes (BTEX) by EPA Method 8021B, and chlorides by EPA Method SM4500CL-B.

Table 1 provides a summary of the laboratory results. Figure 2 shows the sample locations. The laboratory reports and chain of custody documentation are provided in Appendix C. Photographic documentation is provided in Appendix D.

Referring to Table 1, concentrations of TPH and BTEX were reported below the test method detection limits in all samples. Concentrations of chlorides were reported below the Closure Criteria in all samples except sample S-4 1FT (688 milligrams per kilogram [mg/kg]). As chloride concentrations in sample S-4 2FT were reported below the Closure Criteria (496 mg/kg), and the minor concentration is not a threat to groundwater, excavation was not conducted.

6.0 Summary of Remediation Activities

On September 25, 2024, soil was excavated to the north, south, east, and west around sample point S-4, until results of field testing from the bottom and sidewalls of the excavated showed all chloride concentrations below the Closure Criteria. The final excavation measured 20' x 10' to a depth of between 1.5' and 2' bgs. Soil samples from the bottom (S-9) and sidewalls S-5 through S-8) of the excavation were placed in clean glass sample jars, properly labeled, immediately placed on ice, and hand delivered to Cardinal for analysis of TPH, BTEX, and chlorides.

Table 1 provides a summary of the laboratory results. Figure 2 shows the sample locations. The laboratory reports and chain of custody documentation are provided in Appendix C. Photographic documentation is provided in Appendix D.



Referring to Table 1, concentrations of TPH and BTEX were reported below the test method detection limit in all samples, and concentrations of chlorides were reported below the Closure Criteria in each sample.

Approximately 12 cubic yards of excavated soil was hauled to South Monument Surface Waste Facility on September 25, 2024. A copy of the Waste Manifest is provided in Appendix E.

7.0 Summary of Reclamation Activities

As investigation activities did not extend into previously undisturbed areas, compliance with the Cultural Properties Protection (CPP) Rule was not required.

The excavation will be backfilled with clean caliche upon OCD and State Land Office Environmental Compliance Office approval of this Closure Request.

8.0 Closure Request

As confirmation samples reported all TPH, BTEX, and chloride concentrations below the closure criteria, Morgan Operating, Inc. respectfully requests closure of Incident #'s nPRS0522047385 and nSAD0521635557.

9.0 Distribution

- Copy 1: Mike Bratcher
New Mexico Energy, Minerals, and Natural Resources Department
Oil Conservation Division, District 2
Mike.Bratcher@emnrd.nm.gov
- Copy 2: Brittany Hall
New Mexico Energy, Minerals, and Natural Resources Department
Environmental Bureau Projects Group
Brittany.Hall@emnrd.nm.gov
- Copy 3: Gary Morgan
Morgan Operating, Inc.
moropinc@yahoo.com
- Copy 4: New Mexico State Land Office
Environmental Compliance Office
eco@slo.state.nm.us



TABLE

TABLE 1
SUMMARY OF SOIL SAMPLE ANALYTICAL RESULTS
MORGAN OPERATING, INC.
JR HOLT A #001 (API # 30-025-05559)
NMOCD INCIDENT #S nPRS0522047385 and nSAD0521635557

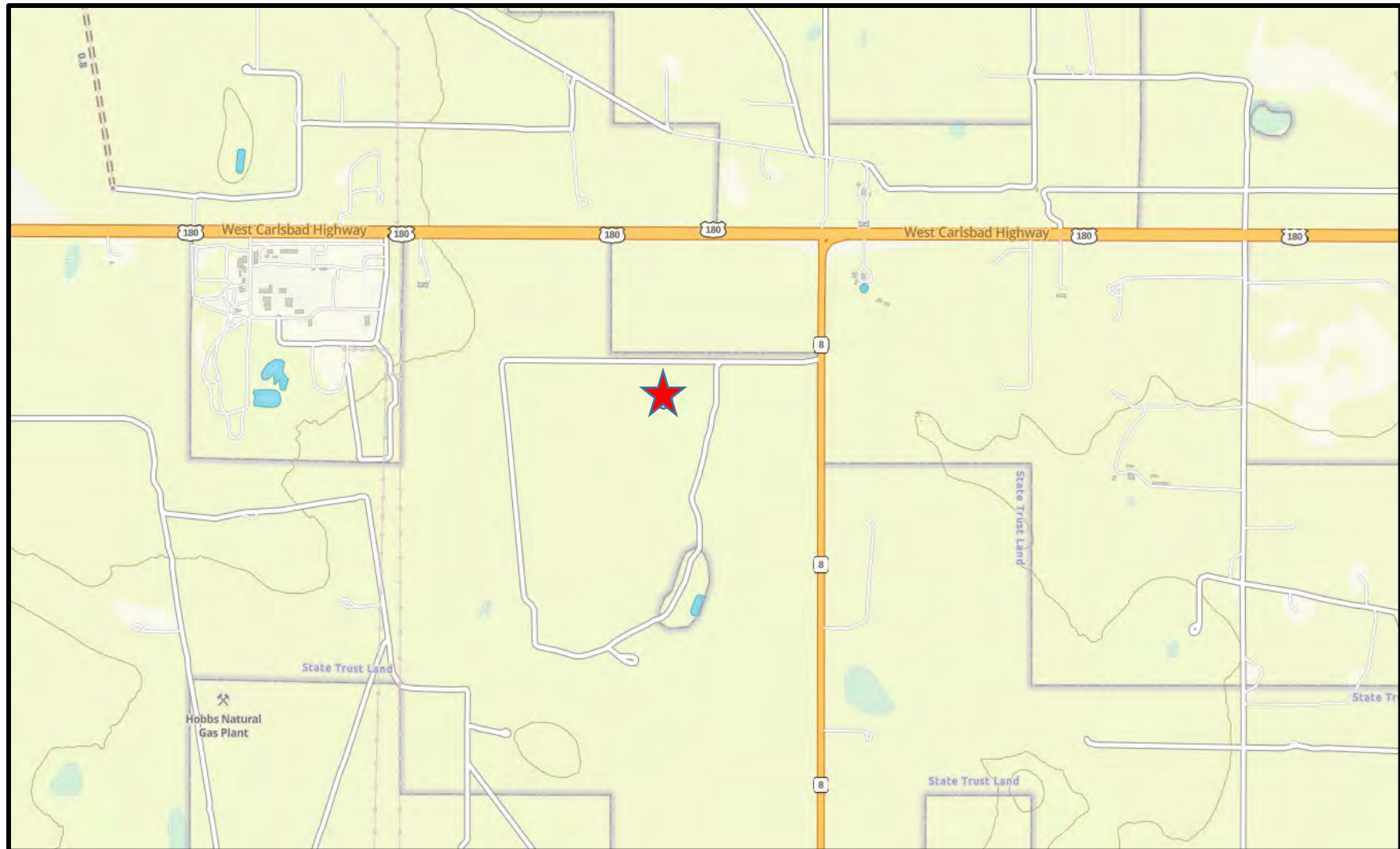
Sample ID	Sample Date	Sample Depth	Soil Status	TPH (GRO)	TPH (DRO)	TPH (MRO)	Total TPH	Benzene	Toluene	Ethylbenzene	Total Xylenes	Total BTEX	Chloride
				milligrams per kilogram (mg/kg)									
NMOCD Closure Criteria							100	10	-	-	-	50	600
Surface	07/10/24	0-6"	In Situ	<10.0	<10.0	<10.0	<10.0	<0.050	<0.050	<0.050	<0.150	<0.300	16.0
1 FT	07/10/24	1'	In Situ	<10.0	<10.0	<10.0	<10.0	<0.050	<0.050	<0.050	<0.150	<0.300	16.0
S-1 2FT	08/07/24	2'	In Situ / Refusal	<10.0	<10.0	<10.0	<10.0	<0.050	<0.050	<0.050	<0.150	<0.300	32.0
Sample 2	08/02/24	1'	In Situ	<10.0	<10.0	<10.0	<10.0	<0.050	<0.050	<0.050	<0.150	<0.300	80.0
S-2 2 FT	08/07/24	2'	In Situ / Refusal	<10.0	<10.0	<10.0	<10.0	<0.050	<0.050	<0.050	<0.150	<0.300	416
Sample 3	08/02/24	1'	In Situ	<10.0	<10.0	<10.0	<10.0	<0.050	<0.050	<0.050	<0.150	<0.300	48.0
S-3 2FT	08/07/24	2'	In Situ / Refusal	<10.0	<10.0	<10.0	<10.0	<0.050	<0.050	<0.050	<0.150	<0.300	208
S-3 30 INCHES	08/07/24	30"	In Situ / Refusal	<10.0	<10.0	<10.0	<10.0	<0.050	<0.050	<0.050	<0.150	<0.300	272
S-4 1FT	08/07/24	1'	In Situ	<10.0	<10.0	<10.0	<10.0	<0.050	<0.050	<0.050	<0.150	<0.300	688
S-9	09/25/24	1.5'	In Situ	<10.0	<10.0	<10.0	<10.0	<0.050	<0.050	<0.050	<0.150	<0.300	416
S-4 2FT	08/07/24	2'	In Situ / Refusal	<10.0	<10.0	<10.0	<10.0	<0.050	<0.050	<0.050	<0.150	<0.300	496
S-5	09/25/24	0-1.5'	In Situ	<10.0	<10.0	<10.0	<10.0	<0.050	<0.050	<0.050	<0.150	<0.300	352
S-6	09/25/24	0-1.5'	In Situ	<10.0	<10.0	<10.0	<10.0	<0.050	<0.050	<0.050	<0.150	<0.300	464
S-7	09/25/24	0-1.5'	In Situ	<10.0	<10.0	<10.0	<10.0	<0.050	<0.050	<0.050	<0.150	<0.300	112
S-8	09/25/24	0-1.5'	In Situ	<10.0	<10.0	<10.0	<10.0	<0.050	<0.050	<0.050	<0.150	<0.300	400

Notes:

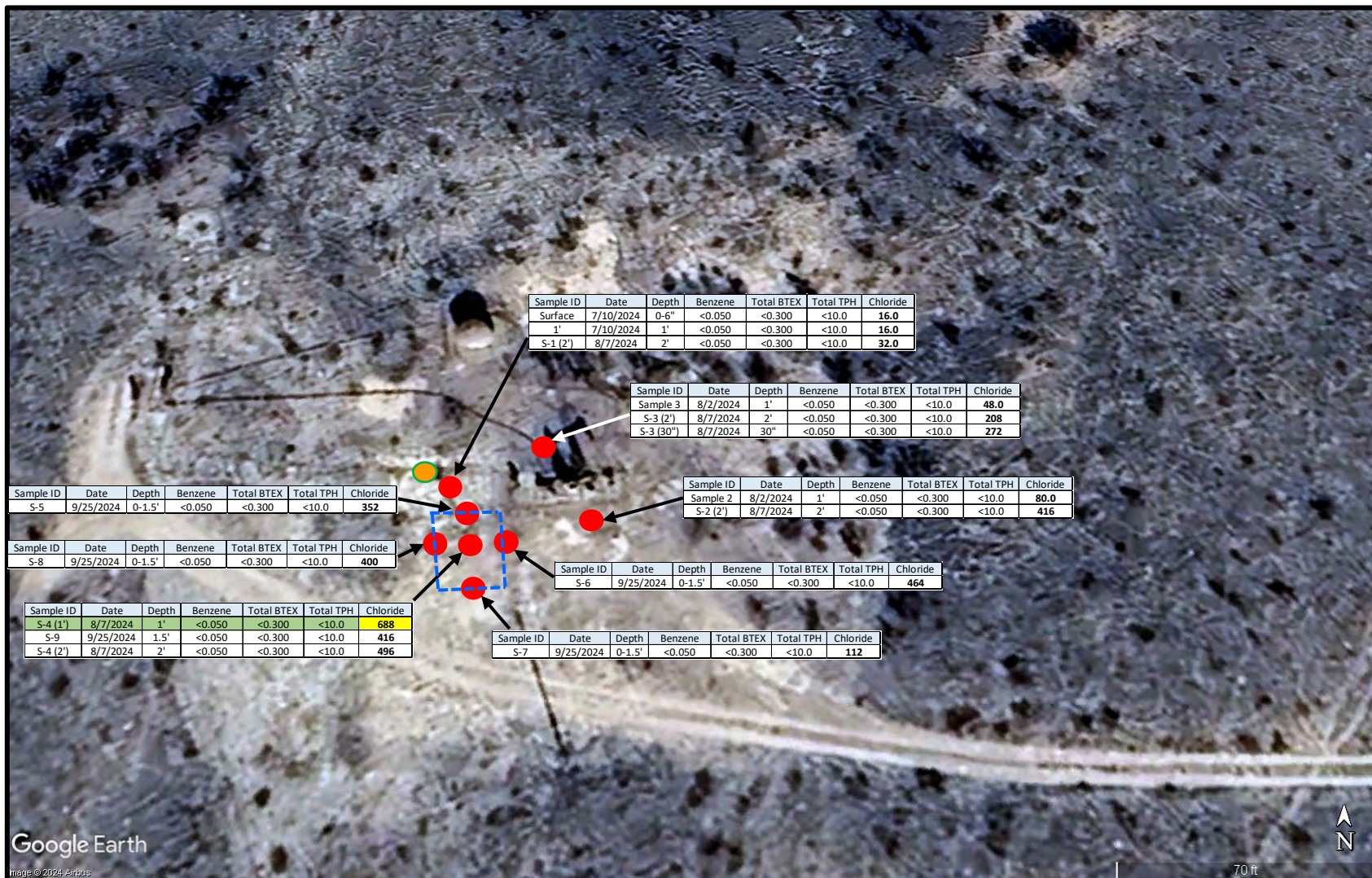
1. GRO: Gasoline Range Organics
2. DRO: Diesel Range Organics
3. MRO: Motor Oil Range Organics
4. -: No NMOCD Closure Criteria established.
5. bgs: Below Ground Surface
6. Bold indicates the COC was above the appropriate laboratory method/sample detection limit.
7. < indicates the COC was below the appropriate laboratory method/sample detection limit.
8. Bold and yellow highlighting indicates the COC was above the appropriate NMOCD Closure Criteria.
9. Green highlighting indicates soil was excavated and disposed.



FIGURES



LEGEND:  Site Location Base Map From GAIA GPS	Figure 1 Site Location Map Morgan Operating, Inc. JR Holt A #001 Lea County, New Mexico		
		Drafted by: CC Checked by: CC	
		Draft: August 23, 2024	
		GPS: 32.6913643° -103.2714539°	

**LEGEND:**

- Soil Sample Location With Concentrations (mg/kg).
- Release Point
- Excavation Boundary
- Highlight Indicates Concentration Above the Closure Criteria
- Highlight Indicates Soil Was Excavated and Disposed

Figure 2**Soil Sample Location Map**

Morgan Operating, Inc.

JR Holt A #001

Lea County, New Mexico

Drafted by: CC | Checked by: CC

Draft: October 8, 2024

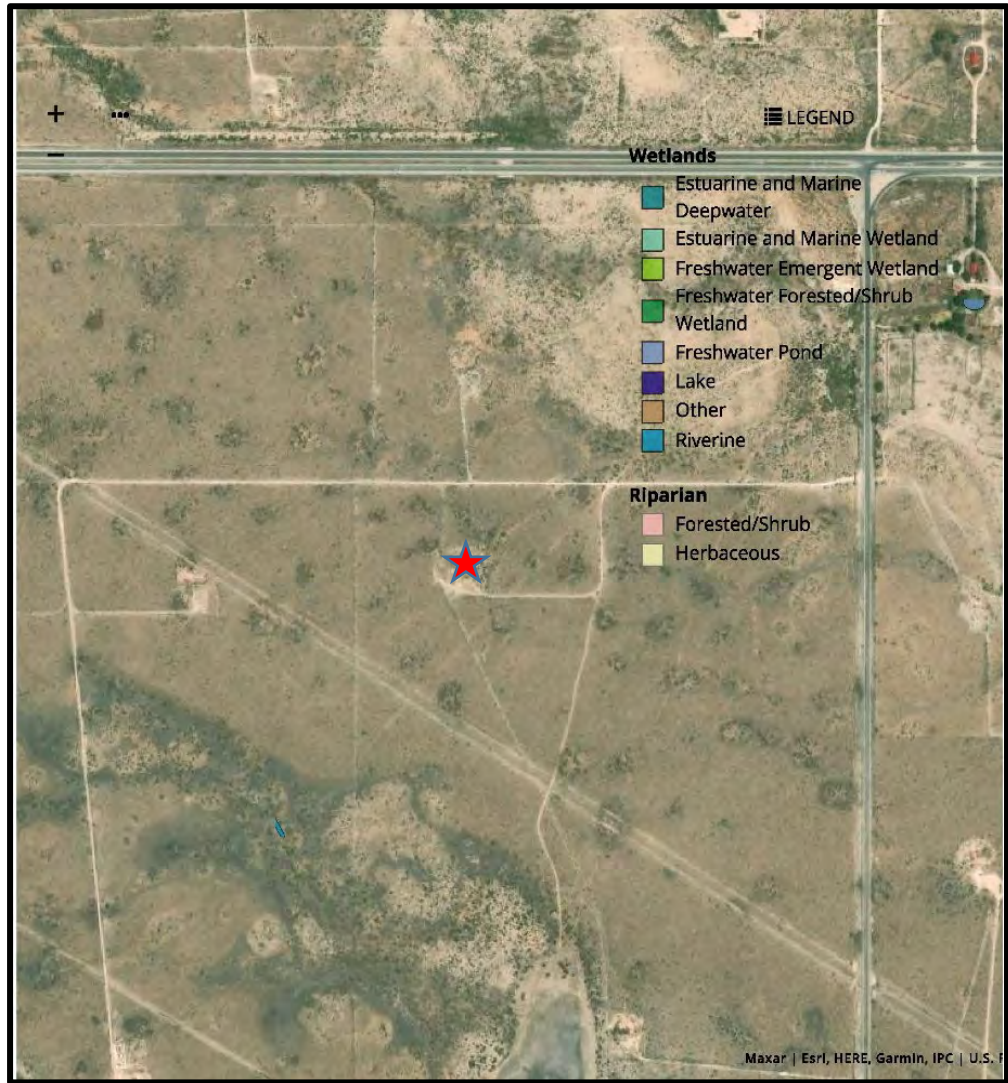
GPS: 32.6913643° -103.2714539°

Base Map From Google Earth Pro

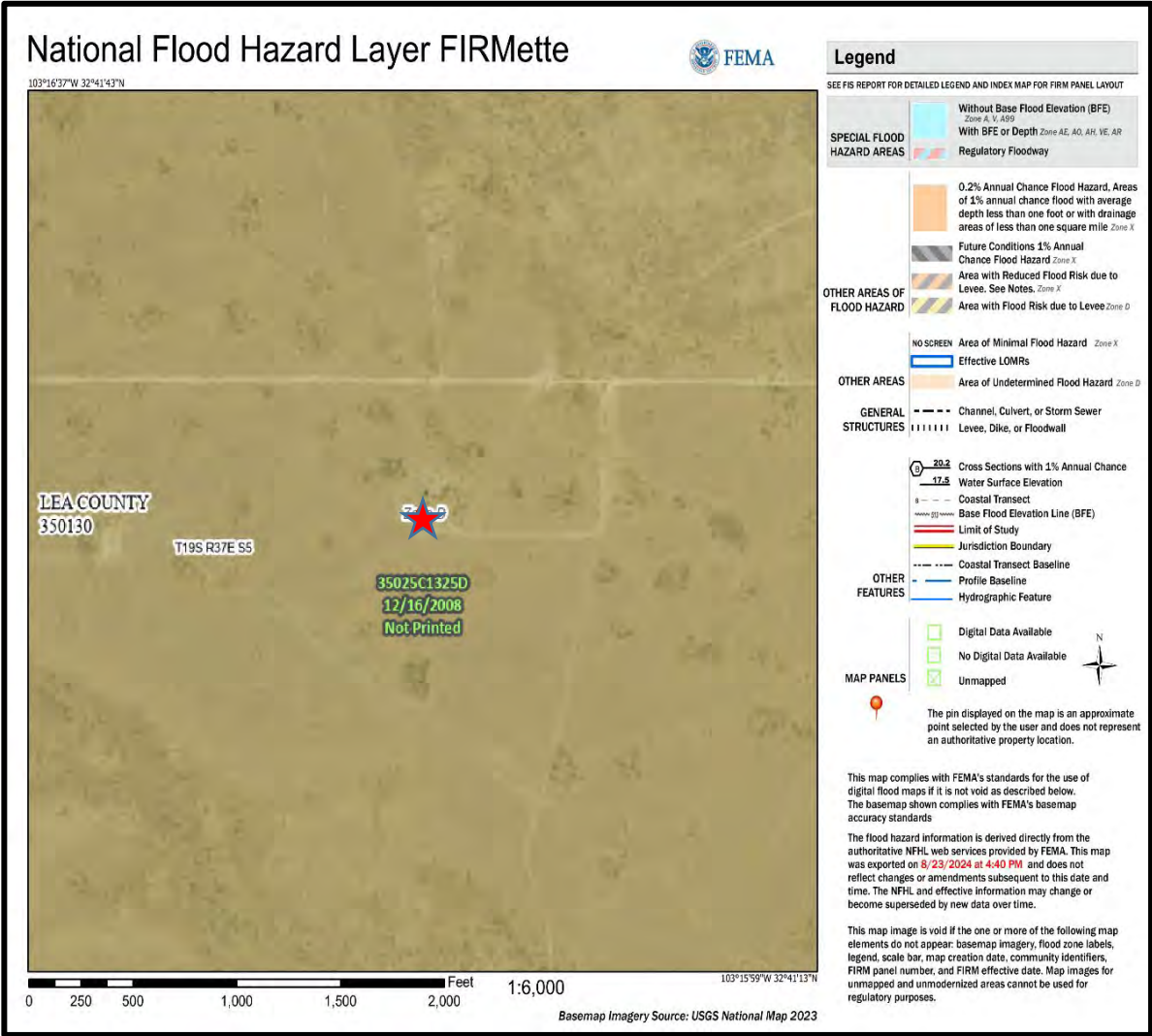




LEGEND:  Site Location Base Map From Google Earth Pro	Figure 3 Wellhead Protection Area Map Morgan Operating, Inc. JR Holt A #001 Lea County, New Mexico		
		Drafted by: CC Checked by: CC	
		Draft: August 23, 2024	
		GPS: 32.6913643° -103.2714539°	



LEGEND:  Site Location Base Map From US Fish & Wildlife Service	Figure 4 National Wetlands Inventory Map Morgan Operating, Inc. JR Holt A #001 Lea County, New Mexico		
		Drafted by: CC Checked by: CC	
		Draft: August 23, 2024	
		GPS: 32.6913643° -103.2714539°	



LEGEND:



Site Location

Base Map From FEMA

Figure 5

FEMA Floodplain Map

Morgan Operating, Inc.

JR Holt A #001

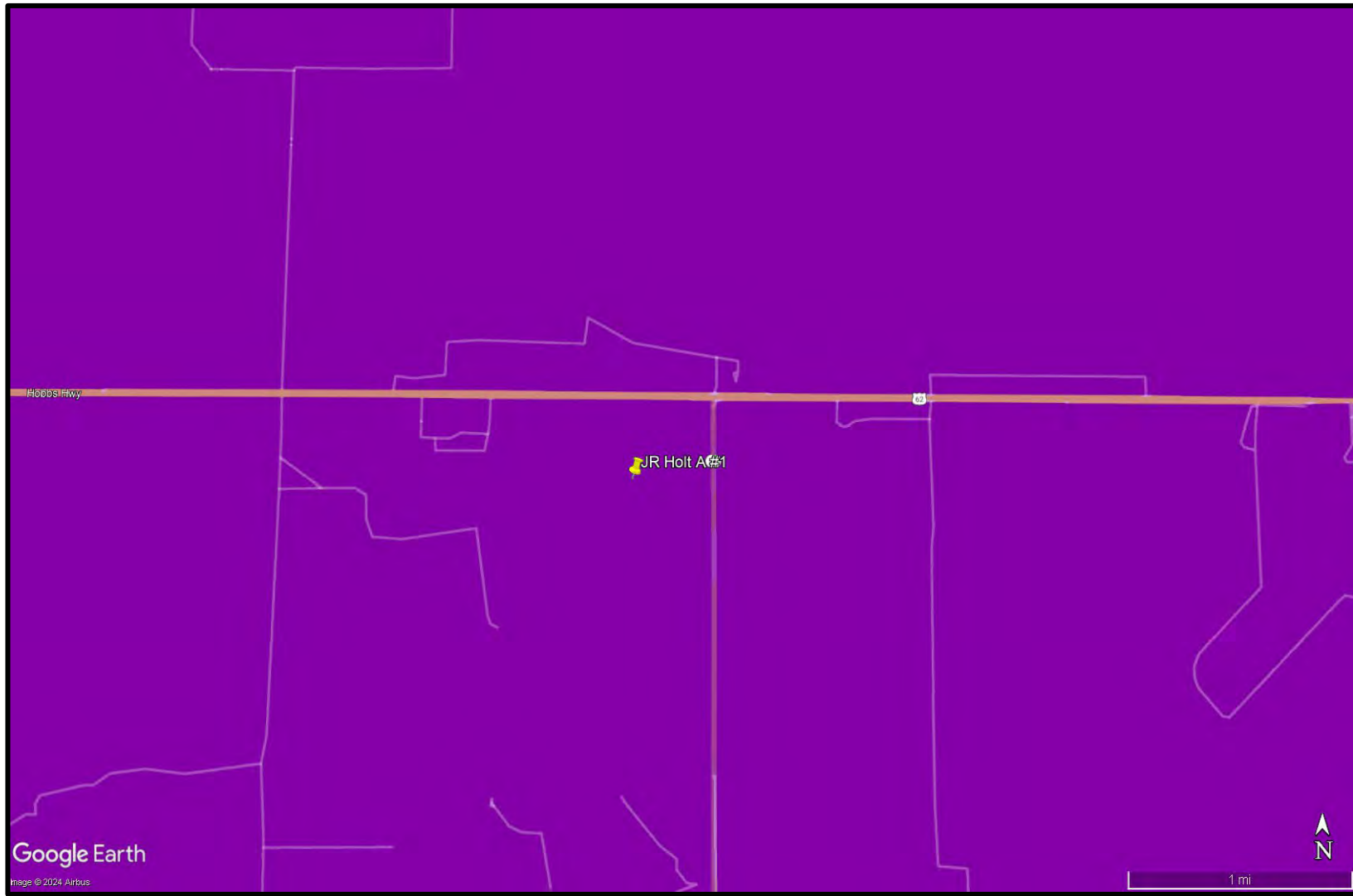
Lea County, New Mexico

Drafted by: CC | Checked by: CC

Draft: August 23, 2024

GPS: 32.6913643° -103.2714539°





LEGEND: Low Karst Potential Medium Karst Potential High Karst Potential Base Map From Google Earth Pro and BLM	Figure 6 Karst Potential Map Morgan Operating, Inc. JR Holt A #001 Lea County, New Mexico		
		Drafted by: CC Checked by: CC	
		Draft: August 23, 2024	
		GPS: 32.6913643° -103.2714539°	



Appendix A: Documentation of NMOCD Records

OCD Permitting

Home Searches Incidents Incident Details

NPRS0522047385 J R HOLT A #001 @ 30-025-05559

General Incident Information

Site Name: J R HOLT A #001

Well: [\[30-025-05559\]](#) J R HOLT A #001

Facility:

Operator: [\[224367\]](#) MORGAN OPERATING, INC.

Status: Closure Not Approved, Pending submission of C-141 from the operator

Type: Other

Severity: Minor

Surface Owner: State

County: Lea (25)

District: Hobbs

Incident Location: G-05-19S-37E 1980 FNL 1980 FEL

Lat/Long: 32.6913643,-103.2714539 NAD83

Directions:

Notes

Source of Referral: Land Owner

Action / Escalation: Referred to Environmental Inspector

Resulted In Fire: ☐

Resulted In Injury: ☐

Endangered Public Health: ☐

Will or Has Reached Watercourse: ☐

Fresh Water Contamination: ☐

Property Or Environmental Damage: ☐

Contact Details

Contact Name:

Contact Title:

Event Dates

Date of Discovery: 07/05/2005

Initial C-141 Report Due: 7/20/2005

Remediation Closure Report Due: 11/13/2018

Incident Dates

Type	Action	Received	Denied	Approved
Remediation Closure Report Extension		08/15/2018		08/15/2018

Compositional Analysis of Vented and/or Flared Natural Gas

No Compositional Analysis Found

Incident Materials

Quic

- [Gene](#)
- [Mater](#)
- [Event](#)
- [Order](#)
- [Actior](#)

Assoc

- Incide
- [Well f](#)

New

- [New f](#)
- [New f](#)
- [New f](#)
- [New f](#)
- [New f](#)
- [New f](#)
- [New f](#)

OCD Permitting

Home Searches Incidents Incident Details

NSAD0521635557 J R HOLT A #001 @ 30-025-05559

General Incident Information

Site Name: J R HOLT A #001

Well: [\[30-025-05559\]](#) J R HOLT A #001

Facility:

Operator: [\[15262\]](#) MOREXCO INC

Status: Closure Not Approved, Pending submission of C-141 from the operator

Type: Other

Severity:

Surface Owner: State

District: Hobbs

County: Lea (25)

Incident Location: G-05-19S-37E 1980 FNL 1980 FEL

Lat/Long: 32.6913643,-103.2714539 NAD83

Directions:

Notes

Source of Referral: Land Owner

Action / Escalation: Referred to Environmental Inspector

Resulted In Fire: ☐

Resulted In Injury: ☐

Endangered Public Health: ☐

Will or Has Reached Watercourse: ☐

Fresh Water Contamination: ☐

Property Or Environmental Damage: ☐

Contact Details

Contact Name:

Contact Title:

Event Dates

Date of Discovery: 07/21/2005

Initial C-141 Report Due: 8/5/2005

Remediation Closure Report Due: 11/13/2018

Incident Dates

Type	Action	Received	Denied	Approved
Remediation Closure Report Extension		08/15/2018		08/15/2018

Compositional Analysis of Vented and/or Flared Natural Gas

No Compositional Analysis Found

Quic

- [Gene](#)
- [Mater](#)
- [Event](#)
- [Order](#)
- [Actio](#)

Assc

- Incide
- [Well f](#)

New

- [New I](#)
- [New I](#)
- [New \(](#)
- [New I](#)
- [New :](#)
- [New "](#)
- [New \](#)

Incident Events

Date	Detail
08/04/2005	PAUL S. AND SYLVIA. D INSPECTED WELL. NO WORK HAS BEEN DONE. (SEE PICTURES) ALSO PAUL S. CALLED 8/5/05 SPOKE TO RHONDA @ MOREXCO, REQUIRING A C-141 BY 8/8/05 AND CLEAN UP PROCEDURE BY WEDNESDAY 8/10/05 OR WILL SHUT WELL IN. (SAD) 8/5/05

Incident Severity

Major release as defined by 19.15.29.7(A) NMAC?

☐ Yes ☒ No

Incident Corrective Actions

- No initial response data was found for this incident.
- No site characterization data was found for this incident.
- No remediation plan data was found for this incident.
- No active remediation deferral request was found for this incident.
- No remediation closure report data was found for this incident.
- No reclamation report data was found for this incident.
- No re-vegetation report data was found for this incident.

Orders

No Orders Found

Equipment Failure	Flow Line - Production	Crude Oil	☐	1	0	1	BBL
The concentration of dissolved chloride in the produced water >10,000 mg/l: ☐ Yes ☒ No							

Incident Events

Date	Detail
08/08/2005	C-141: "Repaired flow line leak. Removed material from location & hauled to disposal. Will replace fresh soil after results of testing are received. Area is 20 x 20 area next ro flow line on location pad, area around well head. Clean up is described in the above remedial action." Psheeley-met on location with Donald Becker on 8/5/05. Release was barely reportable however accumulative soil impact indicates fluids in excess of 5 bbl. was released over time. Rancher reported. Operator did not follow up with OCD per rule 116 until now. Remedial activities (+ delineation) shall be complete by Wed. 8-10-05 per Chris Willlliams.

Incident Severity

Major release as defined by 19.15.29.7(A) NMAC?
☐ Yes ☒ No

Incident Corrective Actions

- No initial response data was found for this incident.
- No site characterization data was found for this incident.
- No remediation plan data was found for this incident.
- No active remediation deferral request was found for this incident.
- No remediation closure report data was found for this incident.
- No reclamation report data was found for this incident.
- No re-vegetation report data was found for this incident.

Orders

No Orders Found

cLWH0520935430

Violation Source: Incident, Spill or Release
Date of Violation: 07/28/2005
Compliance Required: 10/31/2005

Resolved: 08/02/2005

Notes

MESS AT WELL HEAD AND WEST OF WELL

Actions/Events

Event Date	Category	Type
08/02/2005	Corrective Actions	Compliance Resolved
07/28/2005	Enforcements	Pollution and Contamination
07/28/2005	Notifications	Informal Letter (Inspector)

cEZB2130262064

Violation Source:

Field Inspection

Date of Violation:

10/20/2021

Compliance Required:

01/28/2022

Resolved:

02/10/2022

Notes

19.15.16.8 Sign on Wells: Include full API # 30-025-05559. _ Label nearby storage tank. ____ 19.15.10.8 Safety Procedures for Drilling and Production: Excess weeds.

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

State of New Mexico
Energy Minerals and Natural
Resources Department

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

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

Incident ID	nPRS0522047385 and
District RP	nSAD0521635557
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party	Morgan Operating, Inc.	OGRID	224367
Contact Name	Gary Morgan	Contact Telephone	(575) 631-4597
Contact email	moropinc@yahoo.com	Incident # (assigned by OCD)	nPRS0522047385 and nSAD0521635557
Contact mailing address	PO Box 118, Hobbs, NM 88241		

Location of Release Source

Latitude 32.6913643 Longitude -103.2714539
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	JR Holt A #001	Site Type	Well
Date Release Discovered	7/5/2005	API# (if applicable)	30-025-05559

Unit Letter	Section	Township	Range	County
G	5	19S	37E	Lea

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) 1	Volume Recovered (bbls) 0
☒ Produced Water	Volume Released (bbls) 5	Volume Recovered (bbls) 0
	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)

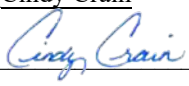
Cause of Release
Break in flow line

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? ☐ Yes ☐ No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice 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

☒ The source of the release has been stopped.	
☒ The impacted area has been secured to protect human health and the environment.	
☒ Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.	
☒ All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why:	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
Printed Name: <u>Cindy Crain</u>	Title: <u>Agent for Morgan Operating, Inc.</u>
Signature: <u></u>	Date: <u>10/9/24</u>
email: <u>cindy.crain@gmail.com</u>	Telephone: <u>(575) 441-7244</u>
<u>OCD Only</u>	
Received by: _____	Date: _____

Incident ID	nPRS0522047385 and
District RP	nSAD0521635557
Facility ID	
Application ID	

Site Assessment/Characterization

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

What is the shallowest depth to groundwater beneath the area affected by the release?	<u><50</u> (ft bgs)
Did this release impact groundwater or surface water?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ☒ No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ☒ No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ☒ No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ☒ No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ☒ No
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ☒ No
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ☒ No
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ☒ No
Did the release impact areas not on an exploration, development, production, or storage site?	☐ Yes ☒ No

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

Characterization Report Checklist: Each of the following items must be included in the report.

- ☒ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☒ Field data
- ☒ Data table of soil contaminant concentration data
- ☒ Depth to water determination
- ☒ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- ☒ Boring or excavation logs
- ☒ Photographs including date and GIS information
- ☒ Topographic/Aerial maps
- ☒ Laboratory data including chain of custody

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

State of New Mexico
Oil Conservation Division

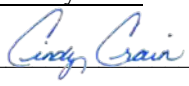
Page 4

Incident ID	nPRS0522047385 and
District RP	nSAD0521635557
Facility ID	
Application ID	

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

Printed Name: Cindy Crain

Title: Agent for Morgan Operating, Inc.

Signature: 

Date: 10/9/24

email: cindy.crain@gmail.com

Telephone: (575) 441-7244

OCD Only

Received by: _____

Date: _____

Incident ID	
District RP	
Facility ID	
Application ID	

Remediation Plan

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

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

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

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

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

Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

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

Signature: _____ Date: _____

Incident ID	nPRS0522047385 and
District RP	nSAD0521635557
Facility ID	
Application ID	

Closure

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

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

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

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Cindy Crain

Title: Agent for Morgan Operating, Inc.

Signature: 

Date: 10/9/24

email: cindy.crain@gmail.com

Telephone: (575) 441-7244

OCD Only

Received by: _____

Date: _____

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

Closure Approved by: _____ Date: _____

Printed Name: _____

Title: _____



Appendix B: Documentation of NMOCD Communication

JR Holt A #001 - Incident #nPRS0522047385 - Proposed Sample Plan

Crain Environmental/MOREXCO - Holt #1



Cindy Crain <cindy.crain@gmail.com>

to brittany.hall@emnrd.nm.gov, Paul



Aug 1, 2024, 3:36 PM



Brittany,

Thank you for taking the time to speak with me today regarding the JR Holt A #001 site.

As we discussed, this email outlines the proposed sampling activities necessary to move this incident toward closure.

Attached please find a map that shows 3 sample locations around the wellhead. At each location, soil samples will be collected from the surface and from depths of 1', 2', 3', and 4' below ground surface (bgs). Each sample will be submitted to Cardinal Laboratories for analysis of TPH, BTEX, and chlorides.

A review of the New Mexico Office of the State Engineer (NMOSE) database, shows there are no water wells within a 0.5-mile radius of the site that were drilled in the last 25 years; therefore, depth to groundwater at the site is assumed to be less than 50' bgs, and the most stringent OCD Closure Criteria will apply. Attached please find a 0.5-mile radius map.

Upon receipt of the laboratory report, the sample results will be compared to the Closure Criteria. If results are reported below the Closure Criteria, a Closure Report (including C-141) will be submitted to the OCD via the fee portal. If results are reported above the Closure Criteria, excavation will be conducted until bottom and sidewall samples from the excavation report TPH, BTEX, and chloride concentrations below the Closure Criteria. A Closure Report will be submitted at that time.

Please let me know if you have any questions, or if you approve this plan.

Thank you,
Cindy Crain

--

Crain Environmental
2925 East 17th Street
Odessa, TX 79761
(575) 441-7244

2 Attachments • Scanned by Gmail



Proposed Sample L...



Hall, Brittany, EMNRD

to me, Paul

Aug 2, 2024, 11:11 AM



Cindy,

OCD is requesting additional sample points be collected. Information available indicate that the release occurred at the well head and west of the well. Historic Google Earth aerials of the site show an area west of the wellhead/pump jack that is devoid of vegetation.

19.15.29.12 D.(1)(a) NMAC states "The responsible party must verbally notify the appropriate division district office two business days prior to conducting final sampling. If the division district office does not respond to the notice within the two business days, the responsible party may proceed with final sampling. The responsible party may request a variance from this requirement upon a showing of good cause as determined by the division." Per our telephone conversation, you had mentioned that the hope was to get the samples collected before the weekend. This will need to be addressed prior to collection of samples is performed. A C-141N

(Sampling notification) must be submitted via the fee portal (there is no fee associated with this C-141) or a variance must be requested pursuant to 19.15.29.14 NMAC.

There are two incident numbers for the JR Holt A #001 (30-025-05559), nPRS0522047385 and nSAD0521635557. All C-141s (including sampling notifications, closure requests, etc.) must be submitted under both incident numbers.

Thank you,

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

Please be advised that the new Digital C-141 is live as of December 1, 2023. Please review the new Digital C-141 submission Dec 1, 2023 Guidance document posted on the EMNRD Website prior to submitting any C-141s. The guidance documents can be found at <https://www.emnrd.nm.gov/ocd/ocd-announcements-and-notifications/> or <https://www.emnrd.nm.gov/ocd/ocd-forms/>.

From: Cindy Crain <cindy.crain@gmail.com>
Sent: Thursday, August 1, 2024 2:37 PM
To: Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>
Cc: Paul Ragsdale <pragsdale3727@gmail.com>
Subject: [EXTERNAL] JR Holt A #001 - Incident #nPRS0522047385 - Proposed Sample Plan

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



Cindy Crain <cindy.crain@gmail.com>



Fri, Aug 2, 2:34 PM



to Brittany,, Paul 

Brittany,

Thank you for your quick response!

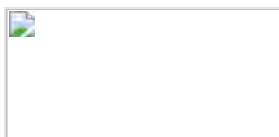
You referred to available information that the release occurred at the wellhead and west of the well. Could you please provide that information, as I'm not finding that in the OCD files.

Based on your email, I am attaching revised Proposed Sample Locations. As Incident #nPRS0522047385 states that the area was only 20' x 20', the proposed samples should cover that area. As in the previous email, samples will be collected from each location at depths of 1', 2', 3', and 4' bgs.

If you are in agreement, samples will be collected next week, and sample notification will be provided via the fee portal for both Incident #s.

Thank you,
Cindy Crain

One attachment • Scanned by Gmail



Proposed Sample L...



Hall, Brittany, EMNRD

Aug 2, 2024, 3:56 PM



to me, Paul 

Cindy,

The information can be found on the well page under the compliance number cLWH0520935430. Mr. Ragsdale included a screenshot of the information in the email he had sent to Robert Hamlet.

OCD will accept the Proposed Sample 2 and Proposed Sample 3 locations and the proposed samples from each location at depths of 1', 2', 3', and 4' bgs.

Please clarify if the locations depicted by Sample 7.10.24 and JR Holt A #1 will also be utilized as sample locations? If yes, please proceed. If no, OCD will require samples to be collected at these locations as well.



Cindy Crain <cindy.crain@gmail.com>

to Brittany,, Paul 



Aug 5, 2024, 3:01 PM



Brittany,

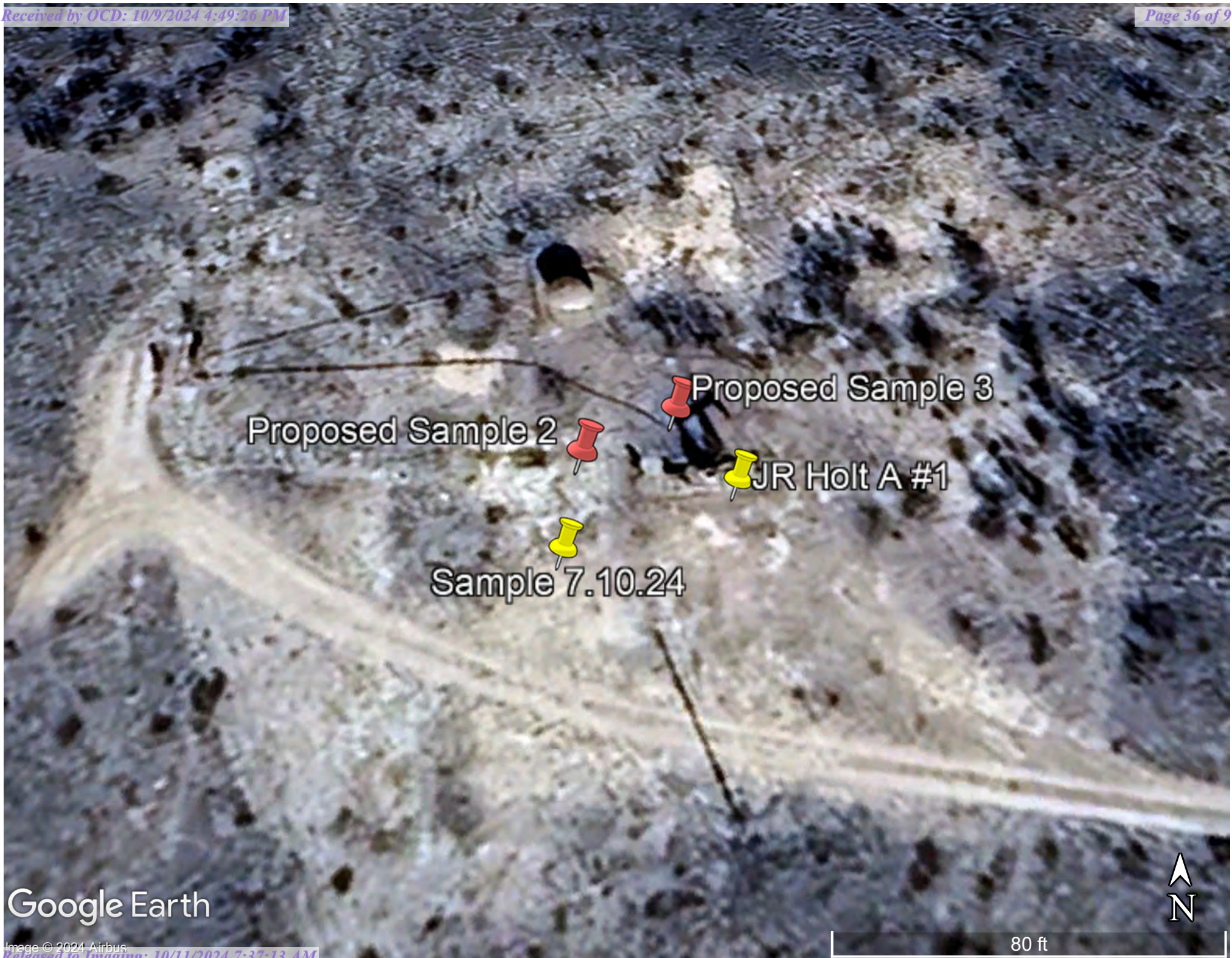
Samples will be collected at all 4 locations (depicted as Sample 7.10.24, Proposed Sample Location 2, Proposed Sample Location 3, and JR Holt A #1) at depth of surface, 1', 2', 3' and 4' below ground surface.

Sampling will be conducted on 8/7/24 at approximately 9:00 am. Sample notification has been provided to the OCD (via the portal) for both Incident #s.

Please let me know if you have any questions or need any additional information at this time.

Thank you for your assistance!

Cindy Crain



Google Earth

From: OCDOnline@state.nm.us
Date: September 4, 2024 at 12:02:09 PM MDT
To: HANNAH_OTM@yahoo.com
Subject: The Oil Conservation Division (OCD) has rejected the application, Application ID: 377775

To whom it may concern (c/o Hannah McDaniel for MORGAN OPERATING, INC.),

The OCD has rejected the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nSAD0521635557, for the following reasons:

- Horizontal delineation submitted was incomplete and did not meet the requirements of 19.15.29.11 NMAC. The values for determination of horizontal impact are values or Table I Closure Criteria for releases where groundwater is at a depth of 50 feet or less. Any sample exceeding approved "background" values or Table I groundwater is at a depth of 50 feet or less requires additional samples for horizontal delineation. Sample 4 at 1' bgs returned laboratory analytical results above further delineated and remediated.
- The questions located under the Site Characterization section of the digital C-141 contain incorrect information. Most of the questions were answered "Greater registered wells, playas, wetlands, and a residence that are closer than 5 miles from the release site. An accurate determination of the distance from the receptor of the digital C-141 must be provided.
- All questions on the digital C-141 that refer to the estimated surface area (in square feet) and estimated volume (in cubic yards) for soils that will be remediated after delineation of the soils above the remediation closure standards is completed.
- Operator failed to provide proper Sampling Notification pursuant to 19.15.29.12.D.(1).(a) NMAC for samples collected on 7/10/2024 and 8/2/2024 and will not be provide proper sampling notice is a compliance issue and OCD may pursue compliance actions pursuant to 19.15.5 NMAC. Operator shall ensure future compliance.
- The work performed does not meet the requirements of the OCD approved sampling plan.
- Submit a complete report through the OCD Permitting website by 11/8/2024.

The rejected C-141 can be found in the OCD Online: Permitting - Action Status, under the Application ID: 377775.

Please review and make the required correction(s) prior to resubmitting.

If you have any questions why this application was rejected or believe it was rejected in error, please contact me prior to submitting an additional C-141.

Thank you,
Brittany Hall
Projects Environmental Specialist - A
505-517-5333
Brittany.Hall@emnrd.nm.gov

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



Cindy Crain <cindy.crain@gmail.com>
to Brittany,, Paul, moropinc 
Brittany

Cindy Crain <cindy.crain@gmail.com>

Sep 5,
2024,
12:06 AM

to Brittany,, Paul, moropinc

Brittany,

I have a couple of questions about the rejection email, and am hoping you have some time to discuss.

I can be available any time Thursday or Friday this week, or any time next week at your convenience.

Please let me know what day and time works best for you.

Thank you,
Cindy Crain

--

Crain Environmental
2925 East 17th Street
Odessa, TX 79761
(575) 441-7244



Hall, Brittany, EMNRD

Sep 6,
2024,
11:06 AM

to me, Paul, moropinc@yahoo.com

Cindy,

I have availability Monday (9/9) or Thursday (9/12) after 1 PM MT. Please let me know what day and time work best for you.

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

Please be advised that the new Digital C-141 is live as of December 1, 2023. Please review the new Digital C-141 submission Dec 1, 2023 Guidance document posted on the EMRND Website prior to submitting any C-141s. The guidance documents can be found

at <https://www.emnrd.nm.gov/ocd/ocd-announcements-and-notifications/> or <https://www.emnrd.nm.gov/ocd/ocd-forms/>.

From: Cindy Crain <cindy.crain@gmail.com>

Sent: Wednesday, September 4, 2024 11:06 PM

To: Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>

Cc: Paul Ragsdale <pragsdale3727@gmail.com>; moropinc@yahoo.com

Subject: [EXTERNAL] Fwd: The Oil Conservation Division (OCD) has rejected the application, Application ID: 377775

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



Cindy Crain <cindy.crain@gmail.com>

Sep 6,
2024,
1:40 PM

to Brittany,, Paul, moropinc

Hi Brittany,

How about Monday at 2:00 pm MT?

Thanks!

Cindy Crain, P.G.
(575) 441-7244
cindy.crain@gmail.com

On Sep 6, 2024, at 11:06 AM, Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov> wrote:



Hall, Brittany, EMNRD

Sep 9,
2024,
8:56 AM

to me, Paul, moropinc@yahoo.com

Cindy,

2 PM MT today works.



Cindy Crain <cindy.crain@gmail.com>

Sep 9,
2024,
10:10 AM

to Brittany,, Paul, moropinc

Thank you, Brittany-

I'll send a meeting invite in a moment.

Cindy Crain, P.G.
(575) 441-7244
cindy.crain@gmail.com



Cindy Crain <cindy.crain@gmail.com>

Sep 21,
2024,
2:22 PM

to Brittany,, moropinc

Brittany,

Thank you for taking the time to speak with me on September 9, 2024 regarding the following comments included in the rejection of the Closure Report. Comments made during our conversation are provided below in red.

- **Horizontal delineation submitted was incomplete and did not meet the requirements of 19.15.29.11 NMAC. The values for determination of horizontal impact are derived by either approved "background" values or Table I Closure Criteria for releases where groundwater is at a depth of 50 feet or less. Any sample exceeding approved "background" values or Table I Closure Criteria for releases where groundwater is at a depth of 50 feet or less requires additional samples for horizontal delineation. Sample 4 at 1' bgs returned laboratory analytical results above the applicable closure criteria and must be further delineated and remediated. Delineation and remediation to be conducted around sample point S-4. Samples will be collected from the sidewalls of the excavation and analyzed for TPH, BTEX, and chlorides. Activities to be conducted on 9/25/24.**
- The questions located under the Site Characterization section of the digital C-141 contain incorrect information. Most of the questions were answered "Greater than 5 (mi.)". OCD has identified OSE registered wells, playas, wetlands,

and a residence that are closer than 5 miles from the release site. An accurate determination of the distance from the receptors listed in the Site Characterization section of the digital C-141 must be provided. **Answers will be revised upon submittal of the revised Closure Report.**

- All questions on the digital C-141 that refer to the estimated surface area (in square feet) and estimated volume (in cubic yards) for soils that will be remediated and reclaimed must be correctly answered after delineation of the soils above the remediation closure standards is completed. **Answers will be revised based upon remediation activities.**
- Operator failed to provide proper Sampling Notification pursuant to 19.15.29.12.D.(1).(a) NMAC for samples collected on 7/10/2024 and 8/2/2024 and will not be accepted as closure samples. Failure to provide proper sampling notice is a compliance issue and OCD may pursue compliance actions pursuant to 19.15.5 NMAC. Operator shall ensure future compliance with 19.15.29.12.D.(1).(a) NMAC. **Sample notifications for 9/25/24 samples were submitted to the OCD on 9/21/24. As we discussed, samples collected on 7/10/24 and 8/2/24 will be considered at delineation samples upon completion of 9/25/24 remediation activities.**
- The work performed does not meet the requirements of the OCD approved sampling plan. **The sample plan was not followed due to encountering the hard rock layer during investigation that the backhoe was unable to penetrate. It was verified in our discussion that this was not an issue.**

We will be at the site on Wednesday, September 25, 2024 to excavate soil around the sample point S-4 location until sidewall samples show all concentrations below the Closure Criteria. Any excavated soil will be hauled to an NMOCD disposal facility. I will contact you by phone if there are any issues while in the field.

Sample notifications for each Incident were submitted via the OCD portal today.

Upon receipt of lab results, a revised Closure Report will be submitted to the fee portal (by 11/8/24).

Please let me know if you have any questions or concerns, or if I provided any responses from our phone conversation that are incorrect.

Thank you for your help!
Cindy Crain

The Oil Conservation Division (OCD) has accepted the application, Application ID: 385539

Inbox



OCDOnline@state.nm.us

1:40 PM (9 minutes ago)



to me

To whom it may concern (c/o Cindy Crain for MORGAN OPERATING, INC.),

The OCD has received the submitted *Notification for (Final) Sampling of a Release* (C-141N), for incident ID (n#) nPRS0522047385.

The sampling event is expected to take place:

When: 09/25/2024 @ 09:00

Where: G-05-19S-37E 1980 FNL 1980 FEL (32.6913643,-103.2714539)

Additional Information: Samples will be collected by Cindy Crain (Crain Environmental)
(575) 441-7244

Additional Instructions: GPS Coordinates for the site are: 32.6913642, -103.2714539

An OCD representative may be available onsite at the date and time reported. In the absence or presence of an OCD representative, sampling pursuant to 19.15.29.12.D NMAC is required. Sampling must be performed following an approved sampling plan or pursuant to 19.15.29.12.D.(1).(c) NMAC. Should there be a change in the scheduled date and time of the sampling event, then another notification should be resubmitted through OCD permitting as soon as possible.

- Failure to notify the OCD of sampling events including any changes in date/time per the requirements of 19.15.29.12.D.(1).(a) NMAC, may result in the remediation closure samples not being accepted.

If you have any questions regarding this application, or don't know why you have received this email, please contact us.

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

9/21/24, 1:48 PM

The Oil Conservation

Division (OCD) has accepted the application, Application ID: 385540 - cindy.crain@gmail.com - Gmail

The Oil Conservation Division (OCD) has accepted the application, Application ID: 385540

Inbox



OCDOnline@state.nm.us

to me

1:43 PM (5 minutes ago)



To whom it may concern (c/o Cindy Crain for MORGAN OPERATING, INC.),

The OCD has received the submitted *Notification for (Final) Sampling of a Release* (C-141N), for incident ID (n#) nSAD0521635557.

The sampling event is expected to take place:

When: 09/25/2024 @ 09:00

Where: G-05-19S-37E 1980 FNL 1980 FEL (32.6913643,-103.2714539)

Additional Information: Samples will be collected by Cindy Crain (Crain Environmental)
(575) 441-7244

Additional Instructions: GPS Coordinates for the site are: 32.6913643, -103.2714539

An OCD representative may be available onsite at the date and time reported. In the absence or presence of an OCD representative, sampling pursuant to 19.15.29.12.D NMAC is required. Sampling must be performed following an approved sampling plan or pursuant to 19.15.29.12.D.(1).(c) NMAC. Should there be a change in the scheduled date and time of the sampling event, then another notification should be resubmitted through OCD permitting as soon as possible.

- **Failure to notify the OCD of sampling events including any changes in date/time per the requirements of 19.15.29.12.D.(1).(a) NMAC, may result in the remediation closure samples not being accepted.**

If you have any questions regarding this application, or don't know why you have received this email, please contact us.

New Mexico Energy, Minerals and Natural Resources Department

1220 South St. Francis Drive

Santa Fe, NM 87505



Appendix C: Laboratory Analytical Reports



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

July 16, 2024

SEAN VELASQUEZ

RAGS

3727 WHITEHEAD RD

ROSWELL, NM 88203

RE: JR HOLT A #001

Enclosed are the results of analyses for samples received by the laboratory on 07/10/24 9:33.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C24-00112. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene".

Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

RAGS
SEAN VELASQUEZ
3727 WHITEHEAD RD
ROSWELL NM, 88203
Fax To:

Received: 07/10/2024
Reported: 07/16/2024
Project Name: JR HOLT A #001
Project Number: 1
Project Location: 32.69137, -103.271463

Sampling Date: 07/10/2024
Sampling Type: Soil
Sampling Condition: ** (See Notes)
Sample Received By: Alyssa Parras

Sample ID: SURFACE (H244101-01)

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	07/13/2024	ND	1.94	97.2	2.00	5.83	
Toluene*	<0.050	0.050	07/13/2024	ND	1.87	93.6	2.00	8.82	
Ethylbenzene*	<0.050	0.050	07/13/2024	ND	1.88	94.1	2.00	10.4	
Total Xylenes*	<0.150	0.150	07/13/2024	ND	5.55	92.5	6.00	10.7	
Total BTEX	<0.300	0.300	07/13/2024	ND					

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: CT					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	07/12/2024	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	07/12/2024	ND	207	103	200	2.20	
DRO >C10-C28*	<10.0	10.0	07/12/2024	ND	209	104	200	1.44	
EXT DRO >C28-C36	<10.0	10.0	07/12/2024	ND					

Surrogate: 1-Chlorooctane 115 % 48.2-134

Surrogate: 1-Chlorooctadecane 130 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

RAGS
SEAN VELASQUEZ
3727 WHITEHEAD RD
ROSWELL NM, 88203
Fax To:

Received: 07/10/2024
Reported: 07/16/2024
Project Name: JR HOLT A #001
Project Number: 1
Project Location: 32.69137, -103.271463

Sampling Date: 07/10/2024
Sampling Type: Soil
Sampling Condition: ** (See Notes)
Sample Received By: Alyssa Parras

Sample ID: 1FT (H244101-02)

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	07/13/2024	ND	2.12	106	2.00	5.82	
Toluene*	<0.050	0.050	07/13/2024	ND	2.07	103	2.00	5.93	
Ethylbenzene*	<0.050	0.050	07/13/2024	ND	2.09	104	2.00	6.18	
Total Xylenes*	<0.150	0.150	07/13/2024	ND	6.17	103	6.00	6.59	
Total BTEX	<0.300	0.300	07/13/2024	ND					

Surrogate: 4-Bromofluorobenzene (PIC) 101 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: CT					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	07/12/2024	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	07/12/2024	ND	207	103	200	2.20	
DRO >C10-C28*	<10.0	10.0	07/12/2024	ND	209	104	200	1.44	
EXT DRO >C28-C36	<10.0	10.0	07/12/2024	ND					

Surrogate: 1-Chlorooctane 120 % 48.2-134

Surrogate: 1-Chlorooctadecane 134 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

Notes and Definitions

- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- ** Samples not received at proper temperature of 6°C or below.
- *** Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page 5 of 5

Company Name: Rago Project Manager: Sean Velasquez Address: 3727 Whitehead Road City: Roswell NM State: NM Zip: 88203 Phone #: 432-202-4753 Fax #: Project #: 1 Project Owner: Project Name: JR Holt A #001 Project Location: 32.69137, -103.271463 Sampler Name: Sean Velasquez				BILL TO P.O. #: Company: Rago Rago Attn: Paul Address: 3727 Whitehead Rd City: Roswell State: NM Zip: 88203 Phone #: 575-626-7900 Fax #:		ANALYSIS REQUEST																	
FOR LAB USE ONLY Lab I.D. H244101 L		Sample I.D. Surface 1ft		MATRIX (GRAB OR COMPOUND) # CONTAINERS GROUNDWATER WASTEWATER SOIL OIL SLUDGE OTHER		PRESERV. ACID/BASE ICE / COOL OTHER		SAMPLING DATE 7/10/24 8:45 AM 7/10/24 8:46 AM TIME 8:45 AM 8:46 AM		B-Tex TPH Chloride													
										X X X		X X X											

PLEASE NOTE: Liability and Damages: Cardinal's liability and client's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors, arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based on any of the above stated reasons or otherwise.

Relinquished By: 		Date: 7/10/24 Time: 9:33		Received By: 		Verbal Result: ☐ Yes ☐ No Add'l Phone #: 432-202-4753	
Relinquished By:		Date:		Received By:		REMARKS: Sean Velasquez 66@gmail.com	
Delivered By: (Circle One) Sampler - UPS - Bus - Other:		Observed Temp. °C 7.7 C Corrected Temp. °C		Sample Condition Cool Intact ☐ Yes ☐ No ☒ No ☐ No		CHECKED BY: (Initials) AD	
				Turnaround Time: Standard ☒ Rush ☐		Bacteria (only) Sample Condition Cool Intact Observed Temp. °C ☐ Yes ☐ No ☐ No ☐ No Corrected Temp. °C	
				Thermometer ID #140 Correction Factor 0°C			

FORM-000-R 3-4 07/11/23

† Cardinal cannot accept verbal changes. Please email changes to celey.keene@cardinallabsnm.com



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

August 08, 2024

PAUL RAGSDALE

RAGS

3727 WHITEHEAD RD

ROSWELL, NM 88203

RE: SAMPLE 2

Enclosed are the results of analyses for samples received by the laboratory on 08/02/24 16:27.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C24-00112. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

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

Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

RAGS
PAUL RAGSDALE
3727 WHITEHEAD RD
ROSWELL NM, 88203
Fax To:

Received: 08/02/2024
Reported: 08/08/2024
Project Name: SAMPLE 2
Project Number: NOT GIVEN
Project Location: 32.691295, -103.271485

Sampling Date: 08/02/2024
Sampling Type: Soil
Sampling Condition: ** (See Notes)
Sample Received By: Alyssa Parras

Sample ID: SAMPLE 2 - 1FT (H244672-01)

BTX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/06/2024	ND	1.94	97.0	2.00	5.17	
Toluene*	<0.050	0.050	08/06/2024	ND	1.92	96.0	2.00	4.77	
Ethylbenzene*	<0.050	0.050	08/06/2024	ND	2.05	102	2.00	4.16	
Total Xylenes*	<0.150	0.150	08/06/2024	ND	6.03	100	6.00	3.94	
Total BTX	<0.300	0.300	08/06/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 99.3 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	08/07/2024	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/07/2024	ND	206	103	200	1.26	
DRO >C10-C28*	<10.0	10.0	08/07/2024	ND	195	97.5	200	0.315	
EXT DRO >C28-C36	<10.0	10.0	08/07/2024	ND					

Surrogate: 1-Chlorooctane 65.9 % 48.2-134

Surrogate: 1-Chlorooctadecane 77.4 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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

Celey D. Keene, Lab Director/Quality Manager



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

Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories

*=Accredited Analyte

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

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

Celey D. Keene, Lab Director/Quality Manager



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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: Regs Project Manager: Paul Ragsdale Address: 3727 Whitehead Rd. City: Roswell, GA State: NM Zip: 88203 Phone #: 432-222-4753 Fax #: Project #: Project Name: Sample 2 Project Location: 32.691295, -103.211485 Sample Name: Dean Velasquez FOR LAB USE ONLY										P.O. #: Company: Regs Attn: Paul Ragsdale Address: 3727 Whitehead Rd. City: Roswell State: NM Zip: 88203 Phone #: 575-626-7403 Fax #:										BILL TO										ANALYSIS REQUEST																			
Lab I.D. H244072 Sample I.D. Sample 2-1F1 3- Samples 1-1F1										(G)RAB OR (C)OMP # CONTAINERS GROUNDWATER WASTEWATER SOIL OIL SLUDGE OTHER:										MATRIX PRESERV SAMPLING										DATE TIME										B-Tex TPH chloride									
Relinquished By: [Signature] Relinquished Date: 8/2/04 Time: 4:27 Date: 8/2/04 Received By: [Signature] Received Date: 8/2/04 Time: 4:05 PM										Turnaround Time: Standard ☒ Rush ☐ Thermometer ID #140 -0.00 Correction Factor 0°C										Verbal Result: ☐ Yes ☐ No ☐ Add'l Phone #: REMARKS: Scanvelasquez 6605 mail.com, pagsdale 372706										Bacteria (only) Sample Condition Cool ☐ Intact ☐ Observed Temp. °C Corrected Temp. °C																			



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

August 08, 2024

PAUL RAGSDALE

RAGS

3727 WHITEHEAD RD

ROSWELL, NM 88203

RE: SAMPLE 3

Enclosed are the results of analyses for samples received by the laboratory on 08/02/24 16:30.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C24-00112. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

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

Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

RAGS
PAUL RAGSDALE
3727 WHITEHEAD RD
ROSWELL NM, 88203
Fax To:

Received: 08/02/2024
Reported: 08/08/2024
Project Name: SAMPLE 3
Project Number: NOT GIVEN
Project Location: 32.691295, -103.271485

Sampling Date: 08/02/2024
Sampling Type: Soil
Sampling Condition: ** (See Notes)
Sample Received By: Alyssa Parras

Sample ID: SAMPLE 3 - 1FT (H244671-01)

BTX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/06/2024	ND	1.94	97.0	2.00	5.17	
Toluene*	<0.050	0.050	08/06/2024	ND	1.92	96.0	2.00	4.77	
Ethylbenzene*	<0.050	0.050	08/06/2024	ND	2.05	102	2.00	4.16	
Total Xylenes*	<0.150	0.150	08/06/2024	ND	6.03	100	6.00	3.94	
Total BTX	<0.300	0.300	08/06/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 97.9 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	08/07/2024	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/06/2024	ND	206	103	200	1.26	
DRO >C10-C28*	<10.0	10.0	08/06/2024	ND	195	97.5	200	0.315	
EXT DRO >C28-C36	<10.0	10.0	08/06/2024	ND					

Surrogate: 1-Chlorooctane 74.8 % 48.2-134

Surrogate: 1-Chlorooctadecane 86.3 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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

Celey D. Keene, Lab Director/Quality Manager



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

Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories

*=Accredited Analyte

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

Celey D. Keene, Lab Director/Quality Manager



Page 4 of 4

† Cardinal cannot accept verbal changes. Please email changes to celeey.keene@cardinallabsnm.com



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

August 13, 2024

SEAN VELASQUEZ

RAGS

3727 WHITEHEAD RD

ROSWELL, NM 88203

RE: JR HOLT A #001

Enclosed are the results of analyses for samples received by the laboratory on 08/07/24 10:00.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C24-00112. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

RAGS
SEAN VELASQUEZ
3727 WHITEHEAD RD
ROSWELL NM, 88203
Fax To:

Received: 08/07/2024
Reported: 08/13/2024
Project Name: JR HOLT A #001
Project Number: 1
Project Location: 32.69137, -103.271463

Sampling Date: 08/07/2024
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: S-1 2FT (H244741-01)

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/07/2024	ND	2.40	120	2.00	3.73	
Toluene*	<0.050	0.050	08/07/2024	ND	2.37	119	2.00	1.38	
Ethylbenzene*	<0.050	0.050	08/07/2024	ND	2.40	120	2.00	0.749	
Total Xylenes*	<0.150	0.150	08/07/2024	ND	7.20	120	6.00	0.505	
Total BTEx	<0.300	0.300	08/07/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 111 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	08/08/2024	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/07/2024	ND	184	91.8	200	0.633	
DRO >C10-C28*	<10.0	10.0	08/07/2024	ND	196	98.2	200	0.486	
EXT DRO >C28-C36	<10.0	10.0	08/07/2024	ND					

Surrogate: 1-Chlorooctane 66.9 % 48.2-134

Surrogate: 1-Chlorooctadecane 72.8 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

Notes and Definitions

- QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
- 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

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

Celey D. Keene, Lab Director/Quality Manager



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

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: <u>Paul Roswell</u> Project Manager: <u>Paul Roswell</u> Address: <u>3727 W. H. Henshaw Road</u> City: <u>Roswell</u> State: <u>NM</u> Zip: <u>88203</u> Phone #: <u>432-202-4753</u> Fax #: _____ Project #: <u>1 JTB H414 001</u> Project Owner: _____ Project Name: <u>32,69137, -103.2714635</u> Project Location: <u>S-1 2ft</u> Sampler Name: <u>Shelly</u> FOR LAB USE ONLY		P.O. #: _____ Company: <u>Roswell</u> Attn: <u>3727 W. H. Henshaw Rd.</u> Address: _____ City: <u>Roswell</u> State: <u>NM</u> Zip: <u>88203</u> Phone #: <u>575-626-7903</u> Fax #: _____	
Lab I.D. <u>H244741</u> Sample I.D. <u>S-1 2ft</u>		BILL TO	
Matrix: (G)RAB OR (C)OMP. _____ # CONTAINERS _____ GROUNDWATER _____ WASTEWATER _____ SOIL ☒ _____ OIL ☒ _____ SLUDGE _____ OTHER: _____ ACID/BASE: _____ ICE / COOL _____ OTHER: _____		PRESERVATION	
DATE <u>8/7</u> TIME <u>9:00am</u>		SAMPLING	
Relinquished By: <u>[Signature]</u> Date: <u>8/7</u> Received By: <u>[Signature]</u> Date: <u>10:00am</u>		ANALYSIS REQUEST	
Relinquished By: <u>[Signature]</u> Date: <u>10:00am</u> Received By: <u>[Signature]</u>		Verbal Result: ☐ Yes ☐ No Add'l Phone #: _____ REMARKS: <u>See analysis 266@gmail.com praysdale372@gmail.com</u>	
Delivered By: (Circle One) <u>Observed Temp. °C</u> <u>15.9</u> Sample Condition <u>Intact</u> CHECKED BY: <u>[Signature]</u> Sampler - UPS - Bus - Other: <u>Corrected Temp. °C</u> <u>15.3</u> Thermometer ID #140 <u>-0.6°C</u> Standard <u>Rush</u> Add'l Phone #: _____ Correction Factor: <u>-0.6°C</u> Bacteria (only) <u>Sample Condition</u> <u>Observed Temp. °C</u> <u>Corrected Temp. °C</u>		Turnaround Time: _____ Standard <u>Rush</u> Add'l Phone #: _____ Thermometer ID #140 <u>-0.6°C</u> Standard <u>Rush</u> Add'l Phone #: _____ Correction Factor: <u>-0.6°C</u> Bacteria (only) <u>Sample Condition</u> <u>Observed Temp. °C</u> <u>Corrected Temp. °C</u>	

† Cardinal cannot accept verbal changes. Please email changes to celey.keene@cardinallabsnm.com



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

August 13, 2024

SEAN VELASQUEZ

RAGS

3727 WHITEHEAD RD

ROSWELL, NM 88203

RE: JR HOLT A #001

Enclosed are the results of analyses for samples received by the laboratory on 08/07/24 10:00.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C24-00112. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene".

Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

RAGS
SEAN VELASQUEZ
3727 WHITEHEAD RD
ROSWELL NM, 88203
Fax To:

Received: 08/07/2024
Reported: 08/13/2024
Project Name: JR HOLT A #001
Project Number: S-2 2 FT
Project Location: 32.691295, -103.271485

Sampling Date: 08/07/2024
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: S-2 2 FT (H244744-01)

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/08/2024	ND	2.40	120	2.00	3.73	
Toluene*	<0.050	0.050	08/08/2024	ND	2.37	119	2.00	1.38	
Ethylbenzene*	<0.050	0.050	08/08/2024	ND	2.40	120	2.00	0.749	
Total Xylenes*	<0.150	0.150	08/08/2024	ND	7.20	120	6.00	0.505	
Total BTEX	<0.300	0.300	08/08/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 111 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	416	16.0	08/09/2024	ND	432	108	400	3.77	

TPH 8015M		mg/kg		Analyzed By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/07/2024	ND	201	100	200	0.963	
DRO >C10-C28*	<10.0	10.0	08/07/2024	ND	192	96.1	200	0.936	
EXT DRO >C28-C36	<10.0	10.0	08/07/2024	ND					

Surrogate: 1-Chlorooctane 54.8 % 48.2-134

Surrogate: 1-Chlorooctadecane 62.1 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

Notes and Definitions

- QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- ** Samples not received at proper temperature of 6°C or below.
- *** Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
Samples reported on an as received basis (wet) unless otherwise noted on report

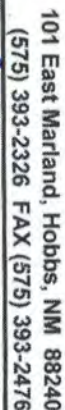
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A handwritten signature in black ink, appearing to read "Celey D. Keene".

Celey D. Keene, Lab Director/Quality Manager



Page 4 of 4

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

August 13, 2024

SEAN VELASQUEZ

RAGS

3727 WHITEHEAD RD

ROSWELL, NM 88203

RE: JR HOLT A #001

Enclosed are the results of analyses for samples received by the laboratory on 08/07/24 10:00.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C24-00112. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

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

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

Accreditation applies to public drinking water matrices.

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Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene".

Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

RAGS
SEAN VELASQUEZ
3727 WHITEHEAD RD
ROSWELL NM, 88203
Fax To:

Received:	08/07/2024	Sampling Date:	08/07/2024
Reported:	08/13/2024	Sampling Type:	Soil
Project Name:	JR HOLT A #001	Sampling Condition:	Cool & Intact
Project Number:	S-3	Sample Received By:	Tamara Oldaker
Project Location:	32.691295, -103.271485		

Sample ID: S-3 2FT (H244742-01)

BTX 8021B			mg/kg		Analyzed By: JH				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/07/2024	ND	2.40	120	2.00	3.73	
Toluene*	<0.050	0.050	08/07/2024	ND	2.37	119	2.00	1.38	
Ethylbenzene*	<0.050	0.050	08/07/2024	ND	2.40	120	2.00	0.749	
Total Xylenes*	<0.150	0.150	08/07/2024	ND	7.20	120	6.00	0.505	
Total BTX	<0.300	0.300	08/07/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 109 % 71.5-134

Chloride, SM4500Cl-B			mg/kg		Analyzed By: AC				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	208	16.0	08/09/2024	ND	432	108	400	3.77	

TPH 8015M			mg/kg		Analyzed By: MS				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/07/2024	ND	184	91.8	200	0.633	
DRO >C10-C28*	<10.0	10.0	08/07/2024	ND	196	98.2	200	0.486	
EXT DRO >C28-C36	<10.0	10.0	08/07/2024	ND					

Surrogate: 1-Chlorooctane 67.9 % 48.2-134

Surrogate: 1-Chlorooctadecane 73.4 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

RAGS
SEAN VELASQUEZ
3727 WHITEHEAD RD
ROSWELL NM, 88203
Fax To:

Received: 08/07/2024
Reported: 08/13/2024
Project Name: JR HOLT A #001
Project Number: S-3
Project Location: 32.691295, -103.271485

Sampling Date: 08/07/2024
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: S-3 30 INCHES (H244742-02)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	08/07/2024	ND	2.40	120	2.00	3.73		
Toluene*	<0.050	0.050	08/07/2024	ND	2.37	119	2.00	1.38		
Ethylbenzene*	<0.050	0.050	08/07/2024	ND	2.40	120	2.00	0.749		
Total Xylenes*	<0.150	0.150	08/07/2024	ND	7.20	120	6.00	0.505		
Total BTEX	<0.300	0.300	08/07/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 112 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	272	16.0	08/09/2024	ND	432	108	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/08/2024	ND	184	91.8	200	0.633	
DRO >C10-C28*	<10.0	10.0	08/08/2024	ND	196	98.2	200	0.486	
EXT DRO >C28-C36	<10.0	10.0	08/08/2024	ND					

Surrogate: 1-Chlorooctane 66.6 % 48.2-134

Surrogate: 1-Chlorooctadecane 72.2 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

Notes and Definitions

- QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
- 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

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

Caley D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

Company Name: **Rugs**Project Manager: **Paul Ragsdale**Address: **3727 Whitehead Rd.**City: **Roswell**Phone #: **432-302-4753**Project #: **05R H-1 001**Project Name: **5-3**Project Location: **32.691295, -103.271485**Sample Name: **Sean Velasquez**

FOR LAB USE ONLY

Lab I.D. **H244742**

Sample I.D.

Matrix

Preserv

Sampling

Date

Time

Turnaround Time

Standard

Bacteria (only)

Cool Intact

Observed Temp. °C

Corrected Temp. °C

Sample Condition

Checked By: (Initials)

Thermometer ID #140

Correction Factor: **-0.6°C**Remarks: **Seavelary w-66@gmail.com, pragsdale 372709**Relinquished By: **Paul Ragsdale**Date: **8/7**Time: **10:00 am**Received By: **Seavelary w-66@gmail.com**Date: **8/7**Time: **10:00 am**

Delivered By: (Circle One)

Sampler - UPS - Bus - Other:

Form 000-03-07711723

Cardinal cannot accept verbal changes. Please email changes to celey.keene@cardinallabsnm.com



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

August 13, 2024

SEAN VELASQUEZ

RAGS

3727 WHITEHEAD RD

ROSWELL, NM 88203

RE: JR HOLT A #001

Enclosed are the results of analyses for samples received by the laboratory on 08/07/24 10:00.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C24-00112. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

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

Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

RAGS
SEAN VELASQUEZ
3727 WHITEHEAD RD
ROSWELL NM, 88203
Fax To:

Received: 08/07/2024
Reported: 08/13/2024
Project Name: JR HOLT A #001
Project Number: S-4
Project Location: 32.691283, -103.2716580

Sampling Date: 08/07/2024
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: S-4 1FT (H244743-01)

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/07/2024	ND	2.40	120	2.00	3.73	
Toluene*	<0.050	0.050	08/07/2024	ND	2.37	119	2.00	1.38	
Ethylbenzene*	<0.050	0.050	08/07/2024	ND	2.40	120	2.00	0.749	
Total Xylenes*	<0.150	0.150	08/07/2024	ND	7.20	120	6.00	0.505	
Total BTEX	<0.300	0.300	08/07/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 107 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	688	16.0	08/09/2024	ND	432	108	400	3.77	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/08/2024	ND	184	91.8	200	0.633	
DRO >C10-C28*	<10.0	10.0	08/08/2024	ND	196	98.2	200	0.486	
EXT DRO >C28-C36	<10.0	10.0	08/08/2024	ND					

Surrogate: 1-Chlorooctane 61.1 % 48.2-134

Surrogate: 1-Chlorooctadecane 65.5 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

RAGS
SEAN VELASQUEZ
3727 WHITEHEAD RD
ROSWELL NM, 88203
Fax To:

Received: 08/07/2024
Reported: 08/13/2024
Project Name: JR HOLT A #001
Project Number: S-4
Project Location: 32.691283, -103.2716580

Sampling Date: 08/07/2024
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: S-4 2FT (H244743-02)

BTX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/08/2024	ND	2.40	120	2.00	3.73	
Toluene*	<0.050	0.050	08/08/2024	ND	2.37	119	2.00	1.38	
Ethylbenzene*	<0.050	0.050	08/08/2024	ND	2.40	120	2.00	0.749	
Total Xylenes*	<0.150	0.150	08/08/2024	ND	7.20	120	6.00	0.505	
Total BTX	<0.300	0.300	08/08/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 113 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	496	16.0	08/09/2024	ND	432	108	400	3.77	

TPH 8015M		mg/kg		Analyzed By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/07/2024	ND	201	100	200	0.963	
DRO >C10-C28*	<10.0	10.0	08/07/2024	ND	192	96.1	200	0.936	
EXT DRO >C28-C36	<10.0	10.0	08/07/2024	ND					

Surrogate: 1-Chlorooctane 50.6 % 48.2-134

Surrogate: 1-Chlorooctadecane 57.7 % 49.1-148

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*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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Notes and Definitions

- QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
- ND Analyte NOT DETECTED at or above the reporting limit
- RPD Relative Percent Difference
- ** Samples not received at proper temperature of 6°C or below.
- *** Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
Samples reported on an as received basis (wet) unless otherwise noted on report

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

Celey D. Keene, Lab Director/Quality Manager



ANALYSIS REQUEST

Page 5 of 5



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

October 01, 2024

CINDY CRAIN

CRAIN ENVIRONMENTAL

2925 E. 17TH STREET

ODESSA, TX 79761

RE: HOLT #1

Enclosed are the results of analyses for samples received by the laboratory on 09/26/24 14:25.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C24-00112. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

CRAIN ENVIRONMENTAL
CINDY CRAIN
2925 E. 17TH STREET
ODESSA TX, 79761
Fax To: (432) 272-0304

Received: 09/26/2024
Reported: 10/01/2024
Project Name: HOLT #1
Project Number: NONE GIVEN
Project Location: LEA CO., NM

Sampling Date: 09/25/2024
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: S - 5 (H245882-01)

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/28/2024	ND	2.20	110	2.00	7.76	
Toluene*	<0.050	0.050	09/28/2024	ND	2.09	104	2.00	11.2	
Ethylbenzene*	<0.050	0.050	09/28/2024	ND	2.13	106	2.00	13.3	
Total Xylenes*	<0.150	0.150	09/28/2024	ND	6.41	107	6.00	14.0	
Total BTEX	<0.300	0.300	09/28/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 101 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	352	16.0	09/30/2024	ND	416	104	400	7.41		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/27/2024	ND	197	98.7	200	2.95	
DRO >C10-C28*	<10.0	10.0	09/27/2024	ND	191	95.5	200	1.32	
EXT DRO >C28-C36	<10.0	10.0	09/27/2024	ND					

Surrogate: 1-Chlorooctane 106 % 48.2-134

Surrogate: 1-Chlorooctadecane 93.7 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

CRAIN ENVIRONMENTAL
CINDY CRAIN
2925 E. 17TH STREET
ODESSA TX, 79761
Fax To: (432) 272-0304

Received: 09/26/2024
Reported: 10/01/2024
Project Name: HOLT #1
Project Number: NONE GIVEN
Project Location: LEA CO., NM

Sampling Date: 09/25/2024
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: S - 6 (H245882-02)

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/28/2024	ND	2.20	110	2.00	7.76	
Toluene*	<0.050	0.050	09/28/2024	ND	2.09	104	2.00	11.2	
Ethylbenzene*	<0.050	0.050	09/28/2024	ND	2.13	106	2.00	13.3	
Total Xylenes*	<0.150	0.150	09/28/2024	ND	6.41	107	6.00	14.0	
Total BTEX	<0.300	0.300	09/28/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 97.7 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	464	16.0	09/30/2024	ND	416	104	400	7.41	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/27/2024	ND	197	98.7	200	2.95	
DRO >C10-C28*	<10.0	10.0	09/27/2024	ND	191	95.5	200	1.32	
EXT DRO >C28-C36	<10.0	10.0	09/27/2024	ND					

Surrogate: 1-Chlorooctane 110 % 48.2-134

Surrogate: 1-Chlorooctadecane 96.7 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

CRAIN ENVIRONMENTAL
CINDY CRAIN
2925 E. 17TH STREET
ODESSA TX, 79761
Fax To: (432) 272-0304

Received: 09/26/2024
Reported: 10/01/2024
Project Name: HOLT #1
Project Number: NONE GIVEN
Project Location: LEA CO., NM

Sampling Date: 09/25/2024
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: S - 7 (H245882-03)

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/28/2024	ND	2.20	110	2.00	7.76	
Toluene*	<0.050	0.050	09/28/2024	ND	2.09	104	2.00	11.2	
Ethylbenzene*	<0.050	0.050	09/28/2024	ND	2.13	106	2.00	13.3	
Total Xylenes*	<0.150	0.150	09/28/2024	ND	6.41	107	6.00	14.0	
Total BTEX	<0.300	0.300	09/28/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 98.1 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	112	16.0	09/30/2024	ND	416	104	400	7.41	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/27/2024	ND	197	98.7	200	2.95	
DRO >C10-C28*	<10.0	10.0	09/27/2024	ND	191	95.5	200	1.32	
EXT DRO >C28-C36	<10.0	10.0	09/27/2024	ND					

Surrogate: 1-Chlorooctane 128 % 48.2-134

Surrogate: 1-Chlorooctadecane 116 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

CRAIN ENVIRONMENTAL
CINDY CRAIN
2925 E. 17TH STREET
ODESSA TX, 79761
Fax To: (432) 272-0304

Received: 09/26/2024
Reported: 10/01/2024
Project Name: HOLT #1
Project Number: NONE GIVEN
Project Location: LEA CO., NM

Sampling Date: 09/25/2024
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: S - 8 (H245882-04)

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/28/2024	ND	2.20	110	2.00	7.76	
Toluene*	<0.050	0.050	09/28/2024	ND	2.09	104	2.00	11.2	
Ethylbenzene*	<0.050	0.050	09/28/2024	ND	2.13	106	2.00	13.3	
Total Xylenes*	<0.150	0.150	09/28/2024	ND	6.41	107	6.00	14.0	
Total BTEX	<0.300	0.300	09/28/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 96.6 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	400	16.0	09/30/2024	ND	416	104	400	7.41	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/27/2024	ND	197	98.7	200	2.95	
DRO >C10-C28*	<10.0	10.0	09/27/2024	ND	191	95.5	200	1.32	
EXT DRO >C28-C36	<10.0	10.0	09/27/2024	ND					

Surrogate: 1-Chlorooctane 96.5 % 48.2-134

Surrogate: 1-Chlorooctadecane 84.4 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

CRAIN ENVIRONMENTAL
CINDY CRAIN
2925 E. 17TH STREET
ODESSA TX, 79761
Fax To: (432) 272-0304

Received: 09/26/2024
Reported: 10/01/2024
Project Name: HOLT #1
Project Number: NONE GIVEN
Project Location: LEA CO., NM

Sampling Date: 09/25/2024
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: S - 9 (H245882-05)

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/28/2024	ND	2.20	110	2.00	7.76	
Toluene*	<0.050	0.050	09/28/2024	ND	2.09	104	2.00	11.2	
Ethylbenzene*	<0.050	0.050	09/28/2024	ND	2.13	106	2.00	13.3	
Total Xylenes*	<0.150	0.150	09/28/2024	ND	6.41	107	6.00	14.0	
Total BTEX	<0.300	0.300	09/28/2024	ND					

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

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	416	16.0	09/30/2024	ND	416	104	400	7.41	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/27/2024	ND	197	98.7	200	2.95	
DRO >C10-C28*	<10.0	10.0	09/27/2024	ND	191	95.5	200	1.32	
EXT DRO >C28-C36	<10.0	10.0	09/27/2024	ND					

Surrogate: 1-Chlorooctane 106 % 48.2-134

Surrogate: 1-Chlorooctadecane 92.6 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

Notes and Definitions

QR-03	The RPD value for the sample duplicate or MS/MSD was outside of QC acceptance limits due to matrix interference. QC batch accepted based on LCS and/or LCSD recovery and/or RPD values.
QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories

*=Accredited Analyte

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

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

Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

Company Name: Craig Environmental

Project Manager: Cindy Crain

Address: 2835 E. 17th St.

City: Alameda

Phone #: (575) 441-7244

Project #:

Project Name: Holt #1

Project Location: Lea Co., NM

Sampler Name: Cindy Crain

BILL TO

P.O. #:

Company: Western Operating

Attn: Greg Wagner

Address:

City: Hobbs

State: NM Zip:

Phone #: (575) 423-4597

Fax #:

ANALYSIS REQUEST

Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX	PRESERV	SAMPLING	DATE	TIME	TPH 8015M	BTEX	Chlorides
1	5-5		1	SOIL	X		9/25/24	1015	X	X	X
2	5-4		1	SOIL				1020	X	X	X
3	5-7		1	SOIL				1025	X	X	X
4	5-8		1	SOIL				1030	X	X	X
5	5-9		1	SOIL				1035	X	X	X

PLEASE NOTE: Liability and damages. Cardinal's liability and client's exclusive remedy for any claim arising out of or from this contract shall be limited to the amount paid by the client for the analysis. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of data, or loss of profits incurred by client, its subsidiaries, affiliates or successors, arising out of or related to the performance of services hereunder. By Cardinal, regardless of whether such claim is based on any of the above stated reasons or otherwise.

Relinquished By:

Date: 9/26/24

Received By:

Verbal Result: ☐ Yes ☐ No Add'l Phone #:

All Results are emailed. Please provide Email address:

Relinquished By:

Date: 9/25

Received By:

REMARKS:

Cindy.Crain@gmail.com

Delivered By: (Circle One)

Observed Temp. °C: 4.3

Sample Condition

CHECKED BY: (Initials)

Turnaround Time:

Standard

☒

Bacteria (only) Sample Condition

Observed Temp. °C

Sampler - UPS - Bus - Other:

Corrected Temp. °C: 5.7

Cool Intact: ☐ Yes ☐ No

Thermometer ID #140

Correction Factor #6

-0.6°C

☐

Cool Intact: ☐ Yes ☐ No

Corrected Temp. °C

† Cardinal cannot accept verbal changes. Please email changes to cecily.keene@cardinallabsnm.com



Appendix D: Photographic Documentation

APPENDIX D
PHOTOGRAPHIC DOCUMENTATION
JR HOLT A #001



View to E of Sample 1 location (7/10/24).



View to NE of Sample 1 Location (7/10/24).



View of Sample 2 location (8/2/24).



View of sample 3 location (8/2/24).



View to E of Sample 1 location (8/7/24).



View of test hole sampling (8/7/24).

APPENDIX D
PHOTOGRAPHIC DOCUMENTATION
JR HOLT A #001



View to S of excavation (9/25/24).



View to NE of excavation (9/25/24).



View to E of excavating (9/25/24).



View of tape measure at E sidewall (9/25/24).



View to W of loading dump truck with excavated soil (9/25/24).



Appendix E: Waste Manifest

Manifest # _____

SOUTH MONUMENT SURFACE WASTE FACILITY**LANDFARM - DIRT SALES**

(575) 390-7996 CELL (575) 390-3665 CELL (575) 397-6109 WORK

LEASE OPERATOR

ORIGINATING LOCATION MORGANLEASE JR. HALTA #001

S _____ R _____ T _____

TRANSPORTER NAME & ADDRESS

El primo trucking LLC po Box 2912 Hobbs NM 88241
DESCRIPTION OF WASTE QUANTITY

Non-Hazardous Hydrocarbons

12 yards YDSponderosa trucking 575 441-1404
FACILITY CONTACT:Gary Morgan 575-631-4597
SIGNATURE OF CONTACT09-25-24
DATE

CELL NUMBER MATERIAL PLACED IN: _____

NAME OF TRANSPORTER (DRIVER):

Oscar A Morale
SIGNATURE OF DRIVER09-25-24
DATE**DISPOSAL SITE**South Monument Surface Waste Facility
P. O. Box 418
Hobbs, NM 88241-0418
S25 T20S R36E N/2 NE/4PERMIT #NM-01-0032
N/2 NE/4 S25/T20S/R36E
575-390-7996 CELL
575-391-8391 HOME

"As a condition of acceptance for disposal, I hereby certify that this waste is an exempt waste as defined by the Environmental Protection Agency (EPA). The waste are: generated from oil and gas exploration and production operations; exempt from Resource Conservation and Recovery Act (RCRA) Subtitle C regulations; and not mixed with non-exempt waste."

FACILITY REPRESENTATIVE

DATE

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

QUESTIONS

Action 391386

QUESTIONS

Operator: MORGAN OPERATING, INC. P. O. Box 118 Hobbs, NM 88241	OGRID: 224367
	Action Number: 391386
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nSAD0521635557
Incident Name	NSAD0521635557 J R HOLT A #001 @ 30-025-05559
Incident Type	Other
Incident Status	Remediation Closure Report Received
Incident Well	[30-025-05559] J R HOLT A #001

Location of Release Source	
Please answer all the questions in this group.	
Site Name	J R HOLT A #001
Date Release Discovered	07/21/2005
Surface Owner	State

Incident Details	
Please answer all the questions in this group.	
Incident Type	Other
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	Cause: Corrosion Pipeline (Any) Crude Oil Released: 1 BBL Recovered: 0 BBL Lost: 1 BBL.
Produced Water Released (bbls) Details	Cause: Corrosion Pipeline (Any) Produced Water Released: 4 BBL Recovered: 0 BBL Lost: 4 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 391386

QUESTIONS (continued)

Operator: MORGAN OPERATING, INC. P. O. Box 118 Hobbs, NM 88241	OGRID: 224367
	Action Number: 391386
	Action Type: [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)	More info needed to determine if this will be treated as a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	No
Reasons why this would be considered a submission for a notification of a major release	<i>Unavailable.</i>
<i>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.</i>	

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	True
If all the actions described above have not been undertaken, explain why	<i>Not answered.</i>

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: Hannah McDaniel Email: hannah_otm@yahoo.com Date: 10/09/2024
--	--

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QUESTIONS, Page 3

Action 391386

QUESTIONS (continued)

Operator: MORGAN OPERATING, INC. P. O. Box 118 Hobbs, NM 88241	OGRID:
	224367
	Action Number:
	391386
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	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Greater than 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1000 (ft.) and ½ (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 1 and 5 (mi.)
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	Low
A 100-year floodplain	Between 1 and 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan

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.

Requesting a remediation plan approval with this submission	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.	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No

Soil Contamination Sampling: (Provide the highest observable value for each, in milligrams per kilograms.)

Chloride	(EPA 300.0 or SM4500 Cl B)	688
TPH (GRO+DRO+MRO)	(EPA SW-846 Method 8015M)	0
GRO+DRO	(EPA SW-846 Method 8015M)	0
BTEX	(EPA SW-846 Method 8021B or 8260B)	0
Benzene	(EPA SW-846 Method 8021B or 8260B)	0

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.

On what estimated date will the remediation commence	09/25/2024
On what date will (or did) the final sampling or liner inspection occur	09/25/2024
On what date will (or was) the remediation complete(d)	09/25/2024
What is the estimated surface area (in square feet) that will be reclaimed	200
What is the estimated volume (in cubic yards) that will be reclaimed	12
What is the estimated surface area (in square feet) that will be remediated	200
What is the estimated volume (in cubic yards) that will be remediated	12

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.

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 4

Action 391386

QUESTIONS (continued)

Operator: MORGAN OPERATING, INC. P. O. Box 118 Hobbs, NM 88241	OGRID:	224367
	Action Number:	391386
	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.)

(Ex Situ) Excavation and off-site disposal (i.e. dig and haul, hydrovac, etc.)	Yes
Which OCD approved facility will be used for off-site disposal	MONUMENT SITE #15 (TNM-94-58) [FAB0000000056]
OR which OCD approved well (API) will be used for off-site disposal	Not answered.
OR is the off-site disposal site, to be used, out-of-state	Not answered.
OR is the off-site disposal site, to be used, an NMED facility	Not answered.
(Ex Situ) Excavation and on-site remediation (i.e. On-Site Land Farms)	Not answered.
(In Situ) Soil Vapor Extraction	Not answered.
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	Not answered.
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	Not answered.
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	Not answered.
Ground Water Abatement pursuant to 19.15.30 NMAC	Not answered.
OTHER (Non-listed remedial process)	Not answered.

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.

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: Hannah McDaniel Email: hannah_otm@yahoo.com Date: 10/09/2024
--	--

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 5

Action 391386

QUESTIONS (continued)

Operator: MORGAN OPERATING, INC. P. O. Box 118 Hobbs, NM 88241	OGRID: 224367
	Action Number: 391386
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Deferral Requests Only	
Only answer the questions in this group if seeking a deferral upon approval this submission. Each of the following items must be confirmed as part of any request for deferral of remediation.	
Requesting a deferral of the remediation closure due date with the approval of this submission	No

District I

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

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QUESTIONS, Page 6

Action 391386

QUESTIONS (continued)

Operator: MORGAN OPERATING, INC. P. O. Box 118 Hobbs, NM 88241	OGRID:	224367
	Action Number:	391386
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	385540
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	09/25/2024
What was the (estimated) number of samples that were to be gathered	5
What was the sampling surface area in square feet	100

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	No
All areas reasonably needed for production or subsequent drilling operations have been stabilized, returned to the sites existing grade, and have a soil cover that prevents ponding of water, minimizing dust and erosion	Yes
What was the total surface area (in square feet) remediated	200
What was the total volume (cubic yards) remediated	12
All areas not reasonably needed for production or subsequent drilling operations have been reclaimed to contain a minimum of four feet of non-waste contain earthen material with concentrations less than 600 mg/kg chlorides, 100 mg/kg TPH, 50 mg/kg BTEX, and 10 mg/kg Benzene	Yes
What was the total surface area (in square feet) reclaimed	200
What was the total volume (in cubic yards) reclaimed	12
Summarize any additional remediation activities not included by answers (above)	The excavation is at a depth of 1.5 to 2' bgs and will be backfilled upon approval of this Closure Request.

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.

I hereby agree and sign off to the above statement	Name: Hannah McDaniel Email: hannah_otm@yahoo.com Date: 10/09/2024
--	--

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QUESTIONS, Page 7

Action 391386

QUESTIONS (continued)

Operator: MORGAN OPERATING, INC. P. O. Box 118 Hobbs, NM 88241	OGRID: 224367
	Action Number: 391386
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Reclamation Report	
Only answer the questions in this group if all reclamation steps have been completed.	
Requesting a reclamation approval with this submission	No

District I
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CONDITIONS

Action 391386

CONDITIONS

Operator: MORGAN OPERATING, INC. P. O. Box 118 Hobbs, NM 88241	OGRID: 224367
	Action Number: 391386
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
bhall	Remediation closure approved.	10/10/2024
bhall	Site must be reclaimed at the time of plugging and abandonment. A reclamation report will not be accepted until reclamation of the release area, including areas reasonably needed for production or drilling activities, is complete and meet the requirements of 19.15.29.13 NMAC. Areas not reasonably needed for production or drilling activities will still need to be reclaimed and revegetated as early as practicable.	10/10/2024
bhall	The reclamation report will need to include: Executive Summary of the reclamation activities; Scaled Site Map including sampling locations; Analytical results including, but not limited to, results showing that any remaining impacts meet the reclamation standards and results to prove the backfill is non-waste containing; At least one (1) representative 5-point composite sample will need to be collected from the backfill material that will be used for the reclamation of the top four feet of the excavation. OCD reserves the right to request additional sampling if needed; pictures of the backfilled areas showing that the area is back, as nearly as practical, to the original condition or the final land use and maintain those areas to control dust and minimize erosion to the extent practical; pictures of the top layer, which is either the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater; and a revegetation plan.	10/10/2024
bhall	A revegetation report will not be accepted until revegetation of the release area, including areas reasonably needed for production or drilling activities, is complete and meet the requirements of 19.15.29.13 NMAC. Areas not reasonably needed for production or drilling activities will still need to be reclaimed and revegetated as early as practicable.	10/10/2024
bhall	All revegetation activities will need to be documented and included in the revegetation report. The revegetation report will need to include: An executive summary of the revegetation activities including: Seed mix, Method of seeding, dates of when the release area was reseeded, information pertinent to inspections, information about any amendments added to the soil, information on how the vegetative cover established meets the life-form ratio of plus or minus fifty percent of pre-disturbance levels and a total percent plant cover of at least seventy percent of pre-disturbance levels, excluding noxious weeds per 19.15.29.13 D.(3) NMAC, and any additional information; a scaled Site Map including area that was revegetated in square feet; and pictures of the revegetated areas during reseeding activities, inspections, and final pictures when revegetation is achieved.	10/10/2024