From: Kyle Norman
To: Rodgers, Scott, EMNRD
Cc: Brett Dennis; Laura Flores; Weathers, Stephen; Bratcher, Michael, EMNRD
Subject: [EXTERNAL] RE: The Oil Conservation Division (OCD) has rejected the application, Application ID: 380768
Date: Wednesday, February 5, 2025 1:43:18 PM
Attachments: image001.png
111224-BLM Remediation Plan COAs-final.pdf
Tech Memo_DCP 7717_C24_1 Line Leak_DSL_final draft.pdf

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

Mr. Rodgers,

Please see the attached BLM COA's and the Technical Memorandum on the study at this site as it is in the Dunes Sagebrush Lizard habitat which is on the Endangered Species list with the FWS.

Variance request to apply micro-blaze: we are applying micro-blaze to the overspray area this week according to the BLM guidelines attached in section IX of the COA.

Today we are collecting horizontal delineations around samples OS-1, OS-10, and OS-11. We will submit to the lab under 24-hour rush and will submit results and figure to you once we have received the results.

Please let me know if you have any questions.

Thank you

Kyle Norman
SW Regional Manager

Tasman, Inc.
C: 575-318-5017
knorman@tasman-geo.com
www.tasman-geo.com

From: Kyle Norman
Sent: Tuesday, February 4, 2025 7:02 AM
To: OCDOnline@state.nm.us; Rodgers, Scott, EMNRD <scott.rodgers@emnrd.nm.gov>
Cc: Brett Dennis <bdennis@tasman-geo.com>; Laura Flores <LFlores@tasman-geo.com>; Weathers, Stephen <stephen.weathers@p66.com>
Subject: RE: The Oil Conservation Division (OCD) has rejected the application, Application ID: 380768

Good morning, Mr. Rodgers,

I have submitted the RAP plan with further delineation at HA-2 and we have installed a groundwater determination bore within ½ mile from the site.

We are currently in the process of the remediation of the site. Can you please review the RAP at your earliest convenience and let me know what you think.

Please let me know if you have any questions.

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From: OCDOnline@state.nm.us <OCDOnline@state.nm.us>
Sent: Monday, September 16, 2024 4:47 PM
To: Kyle Norman <knorman@tasman-geo.com>
Subject: The Oil Conservation Division (OCD) has rejected the application, Application ID: 380768

To whom it may concern (c/o Kyle Norman for DCP OPERATING COMPANY, LP),

The OCD has rejected the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nAPP2417743733, for the following reasons:

- **Remediation plan denied. 1. Depth to groundwater is not yet determined. If nearby wells are used to determine depth to groundwater, the wells should be no further than ½ mile away from the site, data must be no more than 25 years old, and well construction information must be provided. If evidence of depth to ground water within a ½ mile radius of the site cannot be provided, impacted soils will need to meet Table 1 Closure Criteria for ground water at a depth of 50 feet or less. 2. The release is not fully delineated. A visual footprint on the surface is not sufficient to assess the horizontal extent of the release. Vertical delineation of HA-2 is incomplete. Please re-submit a revised**

remediation plan or remediation closure request by 11/15/2024.

The rejected C-141 can be found in the OCD Online: Permitting - Action Status, under the Application ID: 380768.
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,
Scott Rodgers
Environmental Specialist - A
505-469-1830
scott.rodgers@emnrd.nm.gov

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

From: Kyle Norman
To: Rodgers, Scott, EMNRD
Cc: Brett Dennis; Laura Flores; Weathers, Stephen; Bratcher, Michael, EMNRD
Subject: [EXTERNAL] RE: The Oil Conservation Division (OCD) has rejected the application, Application ID: 380768
Date: Friday, February 7, 2025 11:28:45 AM
Attachments: image001.png
7717_Table 1_Soil Analytical Summary - Delineation - 2.5.2025.pdf
H250708 TASMAN.pdf
7717_2_7_25_Fig5_DelineationOverview.pdf

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

Mr. Rodger,

Please see the attached delineation figure, table and analytical report on the samples that were OS-17 through OS-21. The site is fully delineated with the samples collected on February 5, 2025. Tasman on behalf of Phillips 66 request a confirmation sample variance to collect 5-point composite samples at 400 sq. ft. area.

Please let me know if you have any questions.

Thank you

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SW Regional Manager

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Cc: Brett Dennis <bdennis@tasman-geo.com>; Laura Flores <LFlores@tasman-geo.com>; Weathers, Stephen <stephen.weathers@p66.com>; Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>
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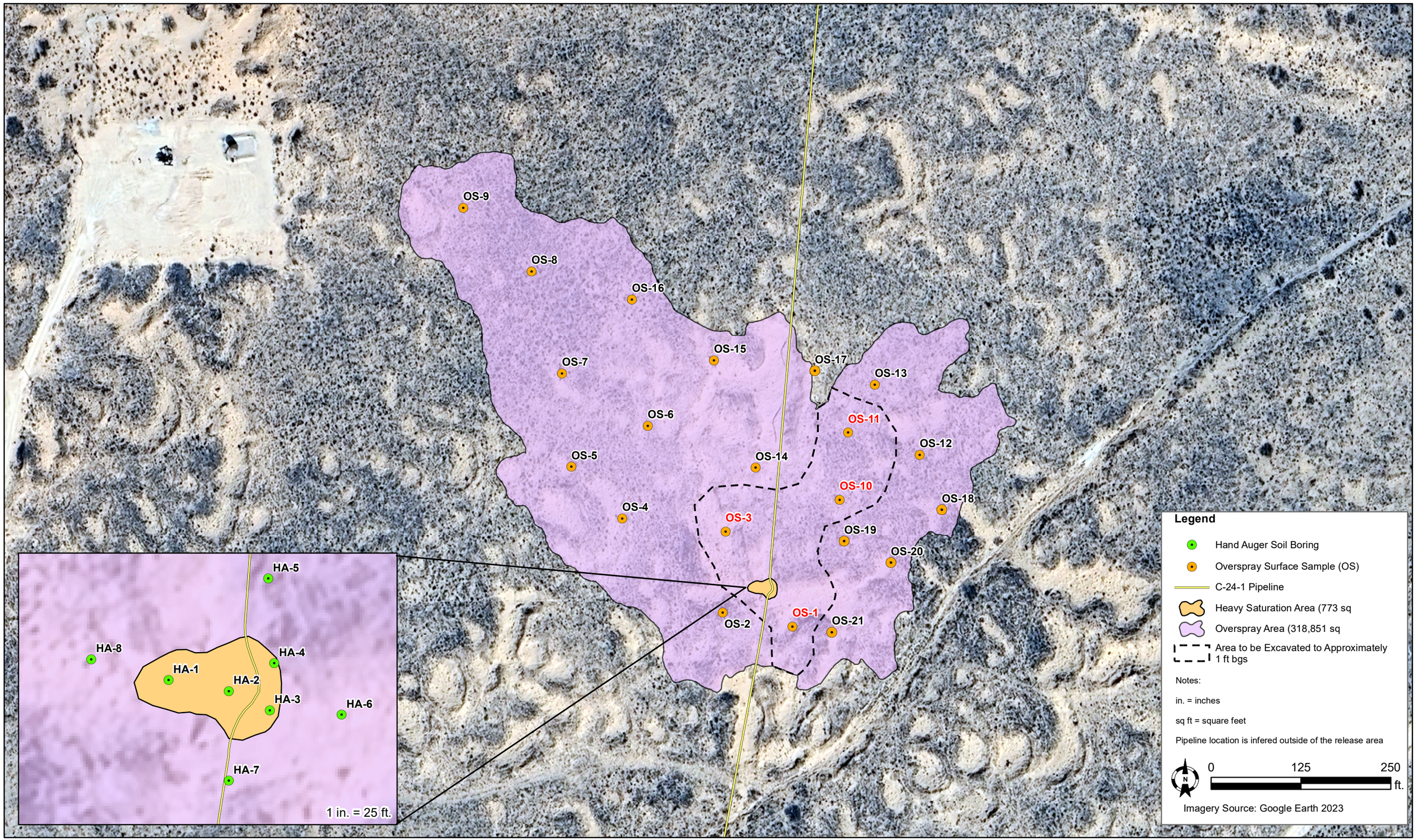
New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505



DATE: February 2025 DESIGNED BY: B. Martinez DRAWN BY: K. Stark	TASMAN **Tasman, Inc.** **6855 W. 119th Ave** **Broomfield, CO 80020**	**DCP Operating Company, LP** **C-24-1 Line Leak - nAPP2417743733** UL "N", Sec. 8, T18S, T33E Lea County, New Mexico	Delineation Overview Map	Figure 5

TABLE 1

SOIL ANALYTICAL SUMMARY

DCP Operating Company, LP

C-24-1 Line Leak (6/23/2024) - nAPP2417743733

Sample ID	Sample Depth (bgs)	Sample Date	Soil Status	PID (ppm)	Field Chloride (mg/kg)	Benzene (mg/kg)	Total BTEX[1] (mg/kg)	TPH[2] (mg/kg)				Chrloride[3] (mg/kg)
								GRO	DRO	MRO	TOTAL	
OS-17	0 - 0.5'	2/5/2025	In-Situ	1.1	121	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<16.0
	1'	2/5/2025	In-Situ	0.2	148	---	---	---	---	---	---	---
	2'	2/5/2025	In-Situ	0.2	149	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<16.0
OS-18	0 - 0.5'	2/5/2025	In-Situ	0.4	149	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	**32.0**
	1'	2/5/2025	In-Situ	0.0	148	---	---	---	---	---	---	---
	2'	2/5/2025	In-Situ	0.0	151	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	**32.0**
OS-19	0 - 0.5'	2/5/2025	In-Situ	0.0	146	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	**96.0**
	1'	2/5/2025	In-Situ	0.3	150	---	---	---	---	---	---	---
	2'	2/5/2025	In-Situ	0.1	150	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	**64.0**
OS-20	0 - 0.5'	2/5/2025	In-Situ	0.3	148	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	**16.0**
	1'	2/5/2025	In-Situ	0.0	150	---	---	---	---	---	---	---
	2'	2/5/2025	In-Situ	0.0	150	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	**96.0**
OS-21	0 - 0.5'	2/5/2025	In-Situ	0.4	148	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	**16.0**
	1'	2/5/2025	In-Situ	0.0	148	---	---	---	---	---	---	---
	2'	2/5/2025	In-Situ	0.1	151	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	**80.0**
NMOCD Reclamation Standards[4] (Applicable for soils less than 4 ft. below grade surface)				**N/A**	**N/A**	**10**	**50**	**N/A**			**100**	**600**
NMOCD Remediation and Delineation Standards[5] (Applicable for soils greater than 4 ft. below grade surface)				**N/A**	**N/A**	**10**	**50**	**1,000**		**N/A**	**2,500**	**20,000**

Notes:

1. BTEX = Benzene, toluene, ethylbenzene, and total xylenes by EPA method 8021B
2. TPH = Total petroleum hydrocarbons analyzed by method EPA 8015M (GRO/DRO/MRO)
3. Chloride - Analyzed by EPA method SM4500
4. New Mexico Administrative Code (NMAC) 19.15.29.13(D) - Restoration, Reclamation, and Re-vegetation (Reclamation for areas no longer in use) for soils extending to 4 ft. below grade surface (bgs).
5. New Mexico Oil Conservation Division (NMOCD) Remediation and Delineation Standards (NMAC 19.15.29.12(N))

* = Denotes discrete/grab sample

Bold values denote concentrations above laboratory RDL

Red values denote concentrations above NMOCD Action Levels

BGS = Below ground surface

GRO = Gasoline range organics

DRO = Diesel range organics

MRO = Motor/lube oil range organics

PID = Photoionization detector

--- = Sample was not analyzed for this analyte

<RDL = The analyte was not detected above the laboratory reported detection limit (RDL)

N/A = Not applicable

Ft. = Feet

Conditions of Approval
Remediation Plan ROW #NM65834 (Phillips 66 C-24-1)
Pipeline Release

Case Summary:

Event Date:	06/23/24
BLM Notification Date:	06/25/24 (BLM notification to Shelly Taylor)
Event Type:	Pipeline release from buried pipeline, pooling with spray
# of Events at this Location:	1
ROW#:	ROW#NM65834 (existing pipeline)
Pipeline name:	C-24-1 pipeline
Pipeline type:	12" buried gas pipeline (with surface exposed sections due to dune drift)
Operator:	Phillips 66 (formerly DCP Ops)
Responsible Party	Phillips 66 (formerly DCP Ops)
Lat/Long:	32.754868, -103.689276 (point of release)
Legals:	T18S, R33E, sec. 8, SESW (point of release)
County:	Lea
Location of Impact:	Pipeline ROW and surrounding terrain
Surface Ownership:	BLM
Released Material:	Condensate, other pipeline fluids, gas
Volume:	7.2 bbls (operator reported; 0 bbls recovered)
Acreage Impacted:	0.017 acres (pool area) to 7.319 acres (spray area)
Karst Impacted?	Karst occurrence level: LOW
Waterway Impacted?	NO
Watershed Impacted?	NO
Archeology Survey required?	Yes.
Archeology Survey submitted?	Yes. #NM CRIS 156915, submitted 11/01/24 to Aaron Whaley, BLM Archeologist. No findings. Standard discovery COAs.
Wildlife Impacted?	Dune Sagebrush Lizard habitat; emergency consultation with FWS required.
FWS Consultation #:	Consultation #02ENNM00-2024-FE-0113340; FWS guidance memo to BLM received 07/09/24.
Biological Survey required?	Yes. A DSL mortality survey and a habitat assessment were conducted by SWCA.
Biological Survey submitted?	Yes, 10/15/2024 and 10/28/2024, submitted to Cassandra Aguillard, BLM Wildlife Biologist.
Other Impact?	large sand dune complex with vegetation/shin oak
Environmental POCs:	Kelley Michael, Phillips 66 Surface Landman/ROW Agent, krmichael@live.com, (432) 238-5821 Kyle Norman, SW Regional Manager, Tasman, Inc., knorman@tasman-geo.com, C: 575-318-5017
Grantee Contacts:	Hyman, Albert L, Albert.L.Hyman@P66.com;

	Case, Nicholas L., Nicholas.L.Case@p66.com; Cook, John W., john.w.cook2@p66.com;
Other Agencies Contacted:	NMOCD, FWS
Remediation Plan Submitted?	Received 10/15/24, with deficiencies.
Reclamation Plan COAs?	Yes. Issued 11/12/24.
Access ROW Required?	Yes. Pending and in progress with BLM Realty, Robert Gomez.
Access ROW #:	Pending.
Reclamation plan Submitted?	Due 11/21/24
Reclamation COA's?	TBD
Final Closure Report Required?	Yes. Due upon completion of remediation/reclamation.
Final Closure Report received?	TBD

Conditions of Approval
Remediation Plan ROW #NM65834 (Phillips 66 C-24-1)

Date: 11/12/24

I. GENERAL:

--BLM Conditions of Approval (COAs) are based on documents and reports submitted by the grantee and do not constitute approval or permission for release of any material in any amount.
--All work and vehicle traffic shall take place within the approved rights-of-way boundary. Traffic, parking, and surface disturbance outside the rights-of-way is prohibited.
--All employees and contractors involved in the project shall be informed of the Conditions of Approval for the submitted project.
--A physical copy of the Conditions of Approval shall be kept at the remediation/reclamation site and available to all personnel, contractors, and any FWS representative or BLM authorized officer upon request.
--The Permittee shall comply with all local, state, and federal laws and regulations during all phases of construction, remediation, and transport.

II. WASTE CONTAINMENT AND DISPOSAL:

--Littering and illegal dumping is a violation of state and federal laws both within and outside the ROW and during transport to and from the work site. The grantee shall prohibit littering and all other forms of illegal waste disposal and shall apply appropriate training, enforcement, auditing, and oversight to ensure all waste is properly disposed.
--All solid and fluid waste shall be properly contained in leak-proof containment and disposed at permitted and authorized disposal sites.
--Containers and transports must contain the waste, without leakage or loss, from the point of waste origin to the authorized disposal site. The contents of any leaking or otherwise malfunctioning containers shall be offloaded to sound leak-proof containers and the faulty container immediately taken out of service.
--All spilled or dropped waste must be picked up and contained immediately, including but not limited to: worker litter; construction trimmings and waste; product packaging/wraps; spilled

materials. Any release of fluid materials during the project must be reported to the BLM immediately.
--Dilution of spilled fluid, solid, or semi-solid waste with water or by blending with uncontaminated soil is prohibited. Free-standing fluids must be vacuumed up and solid waste/powdered waste picked up. Any remaining contaminants or waste on the ground shall be picked up by mechanical means.
--Disposal tickets must be obtained for all waste disposal and shall be made available to BLM authorized officers upon request. Disposal tickets must be legible and with the disposal facility, date, time, and disposal weight clearly indicated and readable. Illegible copies are not acceptable.
--Disposal of solid or fluid waste in pipeline or excavation trenches is prohibited.
--According to information submitted by the grantee, the waste from this remediation operation shall be disposed in the following manner at the following locations:

- All liquid waste and solid contaminated soil from the pipeline release shall be conveyed in leak-proof trucks with an approved hauler's permit and number to the following authorized disposal site:
  - Lea Land, LLC, Permit #WM-01-035 – New Mexico
  - Address: Mile Marker 64, U.S. Hwy 62/180, 30 Miles East of Carlsbad, NM
- Household waste, dry waste, and sack waste shall be collected daily and transported to a Waste Management dumpster located at the Tasman facility. All small particle or powdered waste shall be contained in transport.

III. BIOLOGICAL MONITORING REQUIREMENTS:
--Biological monitors shall be deployed during all phases of construction and remediation and any time construction/remediation activities are in progress at the site.
--Escape ramps shall be installed as per the submitted remediation plan and excavations checked and monitored prior to work startup each day. As excavation progresses, escape ramps will be re-established by close of work each day.
--Access road and work areas shall be monitored daily prior to work startup and during work activities.
--If biological monitoring discovers the presence of DSL, *activities shall cease* and the BLM shall be notified immediately. Notify Terry Gregston, 575-361-2635, tgregsto@blm.gov, and Cassandra Aguillard, (575) 234-2232, caguillard@blm.gov.
--The grantee shall comply with the Fish and Wildlife Service Guidance Memo to BLM (see Attachment #1) during all activities.

IV. ARCHAEOLOGICAL, PALEONTOLOGY & HISTORICAL SITES REQUIREMENTS:
An archeological survey was required and conducted by the Permittee (Archeological Survey #NM CRIS 156915) and submitted to Aaron Whaley, BLM archeologist on 11/01/24. The survey was reviewed and approval to proceed with work is granted with the following requirements:
--Any cultural resource (historic or prehistoric site or object) discovered by the operator, or any person working on the operator's behalf, on the public or federal land shall be immediately reported to the Authorized Officer. The operator shall suspend all operations in the immediate area (within 100ft) of such discovery until written authorization to proceed is issued by the

Authorized Officer. An evaluation of the discovery will be made by the Authorized Officer, in conjunction with a BLM Cultural Resource Specialist, to determine appropriate actions to prevent the loss of significant scientific values. The operator shall be responsible for the cost of evaluation and any decision as to the proper mitigation measures will be made by the Authorized Officer after consulting with the operator.
--The operator is hereby obligated to comply with procedures established in the Native American Graves Protection and Repatriation Act (NAGPRA), specifically NAGPRA Subpart B regarding discoveries, to protect human remains, associated funerary objects, sacred objects, and objects of cultural patrimony discovered during project work. If any human skeletal remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered at any time during construction, all construction activities shall halt and a BLM-CFO Authorized Officer will be notified immediately. The BLM will then be required to be notified, in writing, within 24 hours of the discovery. The written notification should include the geographic location by county and state, the contents of the discovery, and the steps taken to protect said discovery. You must also include any potential threats to the discovery and a conformation that all activity within 100ft of the discovery has ceased and work will not resume until written certification is issued. All work on the entire project must halt for a minimum of 3 days and work cannot resume until an Authorized Officer grants permission to do so.
--Any paleontological resource discovered by the operator, or any person working on the operator's behalf, on public or Federal land shall be immediately reported to the Authorized Officer. The operator shall suspend all operations in the immediate area of such discovery until written authorization to proceed is issued by the Authorized Officer. The operator will be responsible for the cost of evaluation and any decision as to the proper mitigation measures will be made by the Authorized Officer after consulting with the operator.

V. SITE CONSTRUCTION:
--All construction must take place within the ROW boundaries and work areas according to submitted plans.
--The operator shall take measures to ensure that the amount of surface disturbance is limited in all work operations.
--Any accidental disturbance outside the submitted plan boundaries must be reported to the BLM.
--Any additional and necessary disturbance outside the submitted plan boundaries must be approved by the BLM.
--See also section “III Biological Monitoring Requirements” and FWS Guidance (Attachment 1) which are applicable to all construction and remediation activities.

VI. ACCESS ROAD:
According to the submitted remediation plan, the grantee shall use a portion of a pre-existing N-S lease road, construct a temporary east-west access road, and resurface a section of a prior N-S two track according to the specifications of the grantee’s submitted remediation plan and submitted KMZ files. The access road route has been reviewed and approved by BLM Wildlife and Archeology.
--The Permittee shall obtain a Right of Way grant for the access road according to instructions from Robert Gomez, BLM Realty.
--Start up of road construction shall follow instructions from Robert Gomez, BLM Realty.

VII. ACCESS ROAD AND WORK AREA CONSTRUCTION AND USE:

--The access road to the release area shall be bladed flat utilizing a loader.
--Clean caliche (free of any prior contamination or noxious weeds) shall be used to surface the access road and work area.
--Caliche to construct the temporary access road and work area shall be obtained from a federal mineral materials pit located at:

Lat/Long: 32.746444, -103.761007
Pit number: 18321505

--A BLM mineral materials permit is required for the above stated mineral materials pit. The Permittee shall work with Jeffery Timmons, BLM Geologist to obtain the required permit.
--With the exception of necessary remediation work that shall take place off of the north side of the designated work area, the Grantee shall limit surface disturbance to the granted access road and work area and shall take measures to minimize surface disturbance during all activities, including remediation.
--Wooden stakes with flagging shall be placed on the edge of the access route and every 25 ft. of the work area to indicate the surface disturbance boundary. Stakes shall be tall enough and visible enough be readily seen by contractors and drivers during construction, remediation, and driving activities.
--The Grantee shall conduct pre-construction and remediation meetings, regular tailgate briefings, and provide construction/remediation oversight during all activities to ensure all contractors stay inside allotted surface disturbance boundaries.
-- See also section “III Biological Monitoring Requirements” and FWS Guidance (Attachment 1) which are applicable to all construction and remediation activities.

VIII. CONSTRUCTION AND REMEDIATION ACTIVITIES: GENERAL:

--The grantee shall notify the BLM 48 hours before construction and subsequent remediation startup. Contact Terry Gregston, 575-361-2635, tgregsto@blm.gov.
--Construction and remediation activities shall only take place during daylight hours to facilitate biological monitoring during all activities.
--The grantee shall notify the BLM immediately if any construction or remediation irregularities occur. “Irregularities” include but are not limited to: fire or other condition that threatens life and health, public safety, and/or environmental quality; any life-threatening injury or fatality; any situation or condition that requires emergency evacuation of the job site; spills/releases of contaminated materials; equipment/truck failures that release materials; construction/remediation delays; surface impacts outside of allotted access/work area boundaries; severe weather/flooding, etc..)
-- See also section “III Biological Monitoring Requirements” and FWS Guidance (Attachment 1) which are applicable to all construction and remediation activities.

IX. REMEDIATION: MICRO-BLAZE® TREATMENT:

--The grantee shall apply a solution of Micro-Blaze® to the “light spray” impacted areas of the release.
--The Micro-Blaze® shall be applied at the following dilution ratio and rate of application:

1 gallon of Micro-Blaze to 50 gallons of water.
1 gallon of Micro-Blaze concentrate will treat approximately 500-700 square feet.
--An ATV mounted tank and backpack sprayers shall be used to apply the Micro-Blaze® to the overspray affected surface areas.
--The dunes shall not be driven on to apply the Micro-Blaze® treatment.
--Any saturated soil to any depth shall be excavated to clean soil or to a depth of at least 4 feet. See also section "X. Remediation: Excavation of Saturated Soil Areas".
--The Grantee shall ensure adequate treatment coverage of the over-spray affected area to accomplish treatment and reclamation goals.
-- See also section "III Biological Monitoring Requirements" and FWS Guidance (Attachment 1) which are applicable to all construction and remediation activities.

X. REMEDIATION: EXCAVATION OF SATURATED SOIL AREAS:
--The release area shall be *delineated* vertically to: Chloride 660 mg/kg, TPH 100 mg/kg, BTEX 50 mg/kg, and Benzene 10 mg/kg. Field data is acceptable for all samples except bottom sample, which must be sent to a third party lab for final analysis. (Note: The submitted Remediation Plan soil analysis did not fully delineate the bottom of the release.)
--Saturated soil areas shall be excavated to a depth of four feet vertically (or when closure levels are reached) and excavated horizontally to the following closure levels
Chloride 600 mg/kg
TPH (GRO+DRO+MRO) 100 mg/kg
BTEX 50 mg/kg
Benzene 10 mg/kg
--Any standing or pooling fluids in the excavation shall be vacuumed up.
--Upon reaching closure levels, samples shall be pulled every and sent to a third-party lab.
--A summary report including KMZ file of sample points and final lab analysis shall be sent to Terry Gregston, tgregsto@blm.gov for review before excavation closure.
--When fully excavated, contaminated soils deeper than four feet and left in place shall be capped with compacted caliche before backfilling with replacement sand to native contour. The depth of the caliche cap shall be determined by the final bottom sample analysis and a site inspection. Notify Terry Gregston, tgregston@blm.gov when four foot depth is reached and samples are pulled.
--The permittee shall document all phases of remediation with photos, sample points, and final lab analysis and submit the documentation in a final remediation and reclamation report. See section "XIII. Final Closure Report".
--See also section "II Waste Containment and Disposal" for requirements for waste containment, transport, and disposal.
-- See also section "III Biological Monitoring Requirements" and FWS Guidance (Attachment 1) which are applicable to all construction and remediation activities.

XI. REPLACEMENT SAND/SOIL REQUIREMENTS:
--Replacement sand for excavation backfill shall be of a sand grain and consistency that is compatible to the excavated/removed native sand materials.

--As per the submitted remediation plan, sand from a nearby sand pit shall be sampled, sent to Cardinal labs, and analyzed for Texture and Sieve (set of 5).
--The proposed sand pit is on private surface and located at:
Lat/Long: GPS: 32.78596, -103.69727
--Upon receipt of the lab Texture and Sieve analysis, the analysis shall be forwarded to Terry Gregston, tgregsto@blm.gov, and Cassandra Aguillard, caguillard@blm.gov, for review and consultation before pit material use.

XII. SOIL BORING TO DETERMINE DEPTH-TO-GROUNDWATER
As per the submitted remediation plan, the Permittee shall drill a bore to determine depth-to-groundwater. The following conditions of approval include modifications to the submitted plan as per the Permittee's request on 11/05/24.
--The soil bore shall be located in the ROW of #NM65834 (existing 12" gas pipeline) near existing lease roads 1,900 feet from the release location (see Figure 6, submitted remediation plan) at approximately:
Lat/Long (approx.): 32.749799, -103.689934
--The soil bore shall be 65 feet deep.
--The soil bore shall be left open for a period of 72 hours with emergency fencing installed around the bore to prevent damage to the bore by passing vehicles.
--After 72 hours, the static water level shall be measured and reported to Terry Gregston, BLM, tgregsto@blm.gov.
--The bore hole shall be plugged to ground surface by an NMOSE approved method using bentonite clay as a bore seal and fluid migration prevention measure (to prevent surface water from using the bore as a conduit to deeper formations).
--Any spilled bentonite clay on the surface shall be picked up and disposed at an authorized disposal facility.
--Excess mineral materials from the boring shall be recontoured to road grade in a manner that does not impede traffic or roadway surface conditions and that does not degrade pre-existing undisturbed pasture or vegetation.

XII. RECLAMATION PLAN:
--As per the submitted remediation plan, a separate reclamation plan shall be submitted for reclamation and surface reclamation.
--The reclamation plan shall include the following elements:

- Reclamation of the temporary access road and work area.
- Dune reclamation and restoration
- Dune stabilization
- Seed mix and application method
- Monitoring plan

--The reclamation plan shall be submitted by 11/21/24 and is subject to review, consultation, and approval before implementation.

XIII. FINAL CLOSURE REPORT

A final closure report that includes all case documentation, photos, charts, and procedures is required upon completion of remediation and reclamation.

ATTACHMENT I:
FISH AND WILDLIFE SERVICE (FWS) GUIDANCE MEMORANDUM TO BLM

(Note: All fluids in the pipeline release are covered by this memo, not just produced water.)

Date: 07/09/24

Dear Mr. Allen,

Thank you for informing the U. S. Fish and Wildlife Service about the DCP C-24-1 Line produced water release. The incident has been assigned the following consultation number: 02ENNM00-2024-FE-0113340.

The New Mexico Ecological Services Field Office offers the following measures to minimize impacts to Dunes sagebrush lizard (*Sceloporus arenicolus*):

- Excavation and staging areas should be: a.) as small as possible; b.) kept within previously disturbed areas to the greatest extent possible; and c.) not extend into adjacent duneland habitat.
- Vegetation Removal: a) vegetation removal should be a minimized as much as possible; and b) removed only when essential for the clean-up effort or for the safety of personnel.
- Have a qualified biologist on site during excavation activities who is familiar with lizard identification, biology and ecology. Surveys for lizard mortality should be performed prior to remedial actions.
- If lizards are observed within the excavation area, the biologist may attempt to capture and relocate them to a nearby suitable area. Data on the lizards and photographs should be collected. Dead or moribund lizards must be collected, preserved, and deposited at the Museum of Southwestern Biology, at University of New Mexico, Albuquerque, NM.
- Replacement soil should come from an area that is 1. uncontaminated, 2. free of invasive species that might thrive in this habitat, and 3. similar enough that it will support the biota found in this habitat. Grading of the introduced soils should done in such a way that further damage to the habitat is avoided/minimized.
- Application of *Microblaze* should be administered in such a manner as to minimize physical damage to the habitat.
- Reestablishment of pipeline should be avoided or done in a manner such that barriers to lizard movement are avoided (e.g. avoid trench-like features where lizards could get trapped).
- Following the remediation, we recommend that you provide an update to us that includes total acres of habitat affected, damages to shinnery oak and habitat, and any lizards observed and their final disposition. We also recommend that you include any other relevant information such as follow up surveys or monitoring.

As soon as practical, we recommend that you initiate formal consultation if you determine that the response has adversely affected listed species. If you determine that take of a listed species is necessary to control the emergency, save lives or property, and ensure that field crews can safely and effectively do their job, then we recommend that the emergency be responded to appropriately and the Service be contacted as soon as possible to discuss take of listed species that may have occurred. If incidental take of a listed species occurs during the remediation, we may provide an incidental take statement for the remedial actions in a biological opinion at a later date.

Thank you,

Sarah D. Yates
Fish and Wildlife Biologist
U.S. Fish and Wildlife Service
New Mexico Ecological Services
(505) 377-7283 cell
(575) 234-6234 office
sarah_d_yates@fws.gov

CARDINAL Laboratories

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

February 06, 2025

KYLE NORMAN

TASMAN GEOSCIENCES

6899 PECOS ST. UNIT C

DENVER, CO 80221

RE: 7717_C - 24 - 1 LINE LEAK

Enclosed are the results of analyses for samples received by the laboratory on 02/06/25 9:30.

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

Celey D. Keene

Lab Director/Quality Manager

CARDINAL Laboratories

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

Analytical Results For:

TASMAN GEOSCIENCES
KYLE NORMAN
6899 PECOS ST. UNIT C
DENVER CO, 80221
Fax To:

Received:	02/06/2025	Sampling Date:	02/05/2025
Reported:	02/06/2025	Sampling Type:	Soil
Project Name:	7717_C - 24 - 1 LINE LEAK	Sampling Condition:	Cool & Intact
Project Number:	nAPP2417743733	Sample Received By:	Tamara Oldaker
Project Location:	DCP		

Sample ID: OS - 17 @ 0-0.5' (H250708-01)

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	02/06/2025	ND	2.09	105	2.00	3.04	
Toluene*	<0.050	0.050	02/06/2025	ND	2.18	109	2.00	2.19	
Ethylbenzene*	<0.050	0.050	02/06/2025	ND	2.24	112	2.00	2.40	
Total Xylenes*	<0.150	0.150	02/06/2025	ND	6.82	114	6.00	2.50	
Total BTEX	<0.300	0.300	02/06/2025	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	<16.0	16.0	02/06/2025	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	02/06/2025	ND	199	99.4	200	0.692	
DRO >C10-C28*	<10.0	10.0	02/06/2025	ND	204	102	200	3.51	
EXT DRO >C28-C36	<10.0	10.0	02/06/2025	ND					

Surrogate: 1-Chlorooctane *106 %* *48.2-134*

Surrogate: 1-Chlorooctadecane *112 %* *49.1-148*

Cardinal Laboratories *=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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Analytical Results For:

TASMAN GEOSCIENCES
KYLE NORMAN
6899 PECOS ST. UNIT C
DENVER CO, 80221
Fax To:

Received:	02/06/2025	Sampling Date:	02/05/2025
Reported:	02/06/2025	Sampling Type:	Soil
Project Name:	7717_C - 24 - 1 LINE LEAK	Sampling Condition:	Cool & Intact
Project Number:	nAPP2417743733	Sample Received By:	Tamara Oldaker
Project Location:	DCP		

Sample ID: OS - 17 @ 2' (H250708-03)

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	02/06/2025	ND	2.09	105	2.00	3.04	
Toluene*	<0.050	0.050	02/06/2025	ND	2.18	109	2.00	2.19	
Ethylbenzene*	<0.050	0.050	02/06/2025	ND	2.24	112	2.00	2.40	
Total Xylenes*	<0.150	0.150	02/06/2025	ND	6.82	114	6.00	2.50	
Total BTEX	<0.300	0.300	02/06/2025	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	<16.0	16.0	02/06/2025	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	02/06/2025	ND	199	99.4	200	0.692	
DRO >C10-C28*	<10.0	10.0	02/06/2025	ND	204	102	200	3.51	
EXT DRO >C28-C36	<10.0	10.0	02/06/2025	ND					

Surrogate: 1-Chlorooctane *105 %* *48.2-134*

Surrogate: 1-Chlorooctadecane *106 %* *49.1-148*

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Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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Analytical Results For:

TASMAN GEOSCIENCES
KYLE NORMAN
6899 PECOS ST. UNIT C
DENVER CO, 80221
Fax To:

Received:	02/06/2025	Sampling Date:	02/05/2025
Reported:	02/06/2025	Sampling Type:	Soil
Project Name:	7717_C - 24 - 1 LINE LEAK	Sampling Condition:	Cool & Intact
Project Number:	nAPP2417743733	Sample Received By:	Tamara Oldaker
Project Location:	DCP		

Sample ID: OS - 18 @ 0-0.5' (H250708-04)

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	02/06/2025	ND	2.09	105	2.00	3.04	
Toluene*	<0.050	0.050	02/06/2025	ND	2.18	109	2.00	2.19	
Ethylbenzene*	<0.050	0.050	02/06/2025	ND	2.24	112	2.00	2.40	
Total Xylenes*	<0.150	0.150	02/06/2025	ND	6.82	114	6.00	2.50	
Total BTEX	<0.300	0.300	02/06/2025	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	**32.0**	16.0	02/06/2025	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	02/06/2025	ND	199	99.4	200	0.692	
DRO >C10-C28*	<10.0	10.0	02/06/2025	ND	204	102	200	3.51	
EXT DRO >C28-C36	<10.0	10.0	02/06/2025	ND					

Surrogate: 1-Chlorooctane *107 %* *48.2-134*

Surrogate: 1-Chlorooctadecane *111 %* *49.1-148*

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Celey D. Keene, Lab Director/Quality Manager

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Analytical Results For:

TASMAN GEOSCIENCES
KYLE NORMAN
6899 PECOS ST. UNIT C
DENVER CO, 80221
Fax To:

Received:	02/06/2025	Sampling Date:	02/05/2025
Reported:	02/06/2025	Sampling Type:	Soil
Project Name:	7717_C - 24 - 1 LINE LEAK	Sampling Condition:	Cool & Intact
Project Number:	nAPP2417743733	Sample Received By:	Tamara Oldaker
Project Location:	DCP		

Sample ID: OS - 18 @ 2' (H250708-06)

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	02/06/2025	ND	2.09	105	2.00	3.04	
Toluene*	<0.050	0.050	02/06/2025	ND	2.18	109	2.00	2.19	
Ethylbenzene*	<0.050	0.050	02/06/2025	ND	2.24	112	2.00	2.40	
Total Xylenes*	<0.150	0.150	02/06/2025	ND	6.82	114	6.00	2.50	
Total BTEX	<0.300	0.300	02/06/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID *110 %* *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	02/06/2025	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	02/06/2025	ND	199	99.4	200	0.692	
DRO >C10-C28*	<10.0	10.0	02/06/2025	ND	204	102	200	3.51	
EXT DRO >C28-C36	<10.0	10.0	02/06/2025	ND					

Surrogate: 1-Chlorooctane *113 %* *48.2-134*

Surrogate: 1-Chlorooctadecane *116 %* *49.1-148*

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Celey D. Keene, Lab Director/Quality Manager

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

Analytical Results For:

TASMAN GEOSCIENCES
KYLE NORMAN
6899 PECOS ST. UNIT C
DENVER CO, 80221
Fax To:

Received:	02/06/2025	Sampling Date:	02/05/2025
Reported:	02/06/2025	Sampling Type:	Soil
Project Name:	7717_C - 24 - 1 LINE LEAK	Sampling Condition:	Cool & Intact
Project Number:	nAPP2417743733	Sample Received By:	Tamara Oldaker
Project Location:	DCP		

Sample ID: OS - 19 @ 0-0.5' (H250708-07)

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	02/06/2025	ND	2.09	105	2.00	3.04	
Toluene*	<0.050	0.050	02/06/2025	ND	2.18	109	2.00	2.19	
Ethylbenzene*	<0.050	0.050	02/06/2025	ND	2.24	112	2.00	2.40	
Total Xylenes*	<0.150	0.150	02/06/2025	ND	6.82	114	6.00	2.50	
Total BTEX	<0.300	0.300	02/06/2025	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	**96.0**	16.0	02/06/2025	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	02/06/2025	ND	199	99.4	200	0.692	
DRO >C10-C28*	<10.0	10.0	02/06/2025	ND	204	102	200	3.51	
EXT DRO >C28-C36	<10.0	10.0	02/06/2025	ND					

Surrogate: 1-Chlorooctane *106 %* *48.2-134*

Surrogate: 1-Chlorooctadecane *108 %* *49.1-148*

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Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

Analytical Results For:

TASMAN GEOSCIENCES
KYLE NORMAN
6899 PECOS ST. UNIT C
DENVER CO, 80221
Fax To:

Received:	02/06/2025	Sampling Date:	02/05/2025
Reported:	02/06/2025	Sampling Type:	Soil
Project Name:	7717_C - 24 - 1 LINE LEAK	Sampling Condition:	Cool & Intact
Project Number:	nAPP2417743733	Sample Received By:	Tamara Oldaker
Project Location:	DCP		

Sample ID: OS - 19 @ 2' (H250708-09)

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	02/06/2025	ND	1.89	94.5	2.00	1.60	
Toluene*	<0.050	0.050	02/06/2025	ND	2.06	103	2.00	0.152	
Ethylbenzene*	<0.050	0.050	02/06/2025	ND	2.02	101	2.00	2.43	
Total Xylenes*	<0.150	0.150	02/06/2025	ND	6.26	104	6.00	2.65	
Total BTEX	<0.300	0.300	02/06/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID *104 %* *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	**64.0**	16.0	02/06/2025	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	02/06/2025	ND	199	99.4	200	0.692	
DRO >C10-C28*	<10.0	10.0	02/06/2025	ND	204	102	200	3.51	
EXT DRO >C28-C36	<10.0	10.0	02/06/2025	ND					

Surrogate: 1-Chlorooctane *110 %* *48.2-134*

Surrogate: 1-Chlorooctadecane *114 %* *49.1-148*

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Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

Analytical Results For:

TASMAN GEOSCIENCES
KYLE NORMAN
6899 PECOS ST. UNIT C
DENVER CO, 80221
Fax To:

Received:	02/06/2025	Sampling Date:	02/05/2025
Reported:	02/06/2025	Sampling Type:	Soil
Project Name:	7717_C - 24 - 1 LINE LEAK	Sampling Condition:	Cool & Intact
Project Number:	nAPP2417743733	Sample Received By:	Tamara Oldaker
Project Location:	DCP		

Sample ID: OS - 20 @ 0-0.5' (H250708-10)

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	02/06/2025	ND	1.89	94.5	2.00	1.60	
Toluene*	<0.050	0.050	02/06/2025	ND	2.06	103	2.00	0.152	
Ethylbenzene*	<0.050	0.050	02/06/2025	ND	2.02	101	2.00	2.43	
Total Xylenes*	<0.150	0.150	02/06/2025	ND	6.26	104	6.00	2.65	
Total BTEX	<0.300	0.300	02/06/2025	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	**16.0**	16.0	02/06/2025	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	02/06/2025	ND	199	99.4	200	0.692	
DRO >C10-C28*	<10.0	10.0	02/06/2025	ND	204	102	200	3.51	
EXT DRO >C28-C36	<10.0	10.0	02/06/2025	ND					

Surrogate: 1-Chlorooctane *109 %* *48.2-134*

Surrogate: 1-Chlorooctadecane *113 %* *49.1-148*

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Analytical Results For:

TASMAN GEOSCIENCES
KYLE NORMAN
6899 PECOS ST. UNIT C
DENVER CO, 80221
Fax To:

Received:	02/06/2025	Sampling Date:	02/05/2025
Reported:	02/06/2025	Sampling Type:	Soil
Project Name:	7717_C - 24 - 1 LINE LEAK	Sampling Condition:	Cool & Intact
Project Number:	nAPP2417743733	Sample Received By:	Tamara Oldaker
Project Location:	DCP		

Sample ID: OS - 20 @ 2' (H250708-12)

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	02/06/2025	ND	1.89	94.5	2.00	1.60	
Toluene*	<0.050	0.050	02/06/2025	ND	2.06	103	2.00	0.152	
Ethylbenzene*	<0.050	0.050	02/06/2025	ND	2.02	101	2.00	2.43	
Total Xylenes*	<0.150	0.150	02/06/2025	ND	6.26	104	6.00	2.65	
Total BTEX	<0.300	0.300	02/06/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID *104 %* *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	**96.0**	16.0	02/06/2025	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	02/06/2025	ND	199	99.4	200	0.692	
DRO >C10-C28*	<10.0	10.0	02/06/2025	ND	204	102	200	3.51	
EXT DRO >C28-C36	<10.0	10.0	02/06/2025	ND					

Surrogate: 1-Chlorooctane *109 %* *48.2-134*

Surrogate: 1-Chlorooctadecane *111 %* *49.1-148*

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Analytical Results For:

TASMAN GEOSCIENCES
KYLE NORMAN
6899 PECOS ST. UNIT C
DENVER CO, 80221
Fax To:

Received:	02/06/2025	Sampling Date:	02/05/2025
Reported:	02/06/2025	Sampling Type:	Soil
Project Name:	7717_C - 24 - 1 LINE LEAK	Sampling Condition:	Cool & Intact
Project Number:	nAPP2417743733	Sample Received By:	Tamara Oldaker
Project Location:	DCP		

Sample ID: OS - 21 @ 0-0.5' (H250708-13)

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	02/06/2025	ND	1.89	94.5	2.00	1.60	
Toluene*	<0.050	0.050	02/06/2025	ND	2.06	103	2.00	0.152	
Ethylbenzene*	<0.050	0.050	02/06/2025	ND	2.02	101	2.00	2.43	
Total Xylenes*	<0.150	0.150	02/06/2025	ND	6.26	104	6.00	2.65	
Total BTEX	<0.300	0.300	02/06/2025	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	**16.0**	16.0	02/06/2025	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	02/06/2025	ND	199	99.4	200	0.692	
DRO >C10-C28*	<10.0	10.0	02/06/2025	ND	204	102	200	3.51	
EXT DRO >C28-C36	<10.0	10.0	02/06/2025	ND					

Surrogate: 1-Chlorooctane *108 %* *48.2-134*

Surrogate: 1-Chlorooctadecane *112 %* *49.1-148*

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Analytical Results For:

TASMAN GEOSCIENCES
KYLE NORMAN
6899 PECOS ST. UNIT C
DENVER CO, 80221
Fax To:

Received:	02/06/2025	Sampling Date:	02/05/2025
Reported:	02/06/2025	Sampling Type:	Soil
Project Name:	7717_C - 24 - 1 LINE LEAK	Sampling Condition:	Cool & Intact
Project Number:	nAPP2417743733	Sample Received By:	Tamara Oldaker
Project Location:	DCP		

Sample ID: OS - 21 @ 2' (H250708-15)

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	02/06/2025	ND	1.89	94.5	2.00	1.60	
Toluene*	<0.050	0.050	02/06/2025	ND	2.06	103	2.00	0.152	
Ethylbenzene*	<0.050	0.050	02/06/2025	ND	2.02	101	2.00	2.43	
Total Xylenes*	<0.150	0.150	02/06/2025	ND	6.26	104	6.00	2.65	
Total BTEX	<0.300	0.300	02/06/2025	ND					

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

Chloride, SM4500Cl-B mg/kg Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**80.0**	16.0	02/06/2025	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	02/06/2025	ND	199	99.4	200	0.692	
DRO >C10-C28*	<10.0	10.0	02/06/2025	ND	204	102	200	3.51	
EXT DRO >C28-C36	<10.0	10.0	02/06/2025	ND					

Surrogate: 1-Chlorooctane *115 %* *48.2-134*

Surrogate: 1-Chlorooctadecane *117 %* *49.1-148*

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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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CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: Tasman Geosciences	**BILL TO**
Project Manager: Kyle Norman	**P.O. #:**
Address: 2620 W. Marland Blvd.	**Company:** Tasman Geo
City: Hobbs **State:** NM **Zip:** 88240	**Attn:** Kyle Norman
Phone #: 575-318-5017 **Fax #:**	**Address:** 2620 W. Marland
Project #: nAPP2417743733 **Project Owner:** DCP Midstream	**City:** Hobbs
Project Name: 7717_C-24-1 Line Leak	**State:** NM **Zip:** 88240
Project Location:	**Phone #:** 575-318-5017
Sampler Name: Bianca Martinez	**Fax #:**

FOR LAB USE ONLY

Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX: GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	PRESERV.: ACID/BASE:	ICE / COOL	OTHER :	SAMPLING: DATE	TIME	ANALYSIS REQUEST: TPH 8015 Ext	BTEX	Chlorides	Hold	SID 24-hr Rush	48-Hr Rush
H250708																				
1	OS-17 @ 0-0.5'	G	1			X					X		2/05/25	12:41	X	X	X		X	
2	OS-17 @ 1'	G	1			X					X		2/05/25	12:45				X		
3	OS-17 @ 2'	G	1			X					X		2/05/25	12:55	X	X	X		X	
4	OS-18 @ 0-0.5'	G	1			X					X		2/05/25	13:15	X	X	X		X	
5	OS-18 @ 1'	G	1			X					X		2/05/25	13:30				X		
6	OS-18 @ 2'	G	1			X					X		2/05/25	13:41	X	X	X		X	
7	OS-19 @ 0-0.5'	G	1			X					X		2/05/25	13:52	X	X	X		X	
8	OS-19 @ 1'	G	1			X					X		2/05/25	14:07				X		
9	OS-19 @ 2'	G	1			X					X		2/05/25	14:23	X	X	X		X	
10	OS-20 @ 0-0.5'	G	1			X					X		2/05/25	14:31	X	X	X		X	

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Relinquished By:	Date: 2/6/25	Received By:	Phone Result: ☐ Yes ☐ No Add'l Phone #:
	Time: 0930		Fax Result: ☐ Yes ☐ No Add'l Fax #:
Relinquished By:	Date:	Received By:	REMARKS: email results: NMData@tasman-geo.com Weathers, Stephen Stephen.Weathers@p66.com bmartinez@tasman-geo.com
	Time:		

Delivered By: (Circle One) Sampler - UPS - Bus - Other: CF +0.3 #140 -11.0°C / -10.7°C

Sample Condition Cool: Yes / Yes; Intact: No / No

CHECKED BY: (Initials) TO

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CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name:	Tasman Geosciences	**BILL TO**	
Project Manager:	Kyle Norman	**P.O. #:**	
Address:	2620 W. Marland Blvd.	**Company:**	Tasman Geo
City:	Hobbs **State:** NM **Zip:** 88240	**Attn:**	Kyle Norman
Phone #:	575-318-5017 **Fax #:**	**Address:**	2620 W. Marland
Project #:	nAPP2417743733 **Project Owner:** DCP Midstream	**City:**	Hobbs
Project Name:	7717_C-24-1 Line Leak	**State:** NM **Zip:** 88240	
Project Location:		**Phone #:**	575-318-5017
Sampler Name:	Bianca Martinez	**Fax #:**	

FOR LAB USE ONLY				MATRIX						PRESERV.			SAMPLING		ANALYSIS REQUEST											
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:	ICE / COOL	OTHER :	DATE	TIME	TPH 8015 Ext	BTEX	Chlorides	Hold	~~24~~ SD hr Rush	48-Hr Rush						
H250708																									
11	OS-20 @ 1'	G	1			X					X		2/05/25	14:39				X								
12	OS-20 @ 2'	G	1			X					X		2/05/25	14:48	X	X	X		X							
13	OS-21 @ 0-0.5'	G	1			X					X		2/05/25	14:54	X	X	X		X							
14	OS-21 @ 1'	G	1			X					X		2/05/25	15:09				X								
15	OS-21 @ 2'	G	1			X					X		2/05/25	15:19	X	X	X		X							

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Relinquished By:	**Date:** 2/6/25	**Received By:**	Phone Result: ☐ Yes ☑ No	Add'l Phone #:
	Time: 0930		Fax Result: ☐ Yes ☑ No	Add'l Fax #:
Relinquished By:	**Date:**	**Received By:**	REMARKS:	
	Time:		email results: NMData@tasman-geo.com	
Delivered By: (Circle One) Sampler - UPS - Bus - Other:	**Sample Condition** Cool ☑ Yes ☐ Yes Intact ☐ No ☐ No	**CHECKED BY: (Initials)**	Weathers, Stephen Stephen.Weathers@p66.com	
CF +0.3 #140 -11.0° / +11.3° -10.2°			bmartinez@tasman-geo.com	

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Tel 505.254.1115 Fax 505.254.1116
www.swca.com

TECHNICAL MEMORANDUM

To: Stephen Weathers
DCP Operating Company, LP
10 Desta Drive, Suite 600W
Midland, Texas 79705

From: Jenn Clayton, Natural Resources Director
Nicole Smolensky, Subject Matter Expert and Biological Lead

Date: August 16, 2024

Re: **DCP_P66 7717 C-24-1 Pipeline Dunes Sagebrush Lizard Surveys and Endangered Species Act Compliance Technical Memorandum / Project No. 0009100**

INTRODUCTION

DCP Operating Company, LP (DCP), is developing a remediation plan for the '7717_C-24-1 Line Leak' inadvertent pipeline release, which occurred on June 23, 2024. The line leak is entirely on Bureau of Land Management (BLM)–managed lands in Lea County, New Mexico. DCP has identified the area for remediation activities (project area) (Figure 1). The project area consists of a 773-square-foot (feet^2) release area, which has been heavily saturated with released fluids that penetrated the subsurface within a broader overspray area where smaller quantities of fluids were released, affecting the surface. DCP has a proposed access route to the project area originating from a caliche road to the south that passes along DCP's existing pipeline right-of-way. The overspray area is 318,000 feet^2. DCP has communicated with the BLM on the necessary steps for remediation activities.

The project area is within the range of the federally listed endangered dunes sagebrush lizard (*Sceloporus arenicolus*; DSL) and contains suitable habitat, as modeled by the U.S. Fish and Wildlife Service (USFWS) (2024). The BLM and USFWS, via communication with the BLM, have indicated that biological surveys for DSL are needed. DCP contracted SWCA Environmental Consultants (SWCA) to conduct the survey for DSL. Should any DSL be encountered and need to be captured, handled or salvaged, the USFWS authorized SWCA to be a *Designated Agent of the Service* (Letter Number CS6436985-DAS, Project Code 2224-0113340, July 24, 2024) (Appendix A). In this technical memorandum, SWCA presents the findings of the survey for DSL individuals and habitat within the project area. SWCA also provides suggested alternative access routes to the area where specific remediation activities will occur that may minimize or avoid additional impacts to suitable DSL habitat.

This technical memorandum is meant to document completion of required surveys and field observations. Recommendations provided are intended to further facilitate the planning of remediation activities on BLM-managed lands with the intention of reducing the potential for adverse impacts to DSL individuals and suitable habitat to the greatest extent practicable. Recommendations contained within this document

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are the opinions of SWCA biologists based on knowledge of the species and field observations. All project plan actions must be further authorized by the BLM and USFWS before being implemented to ensure compliance with the Endangered Species Act.

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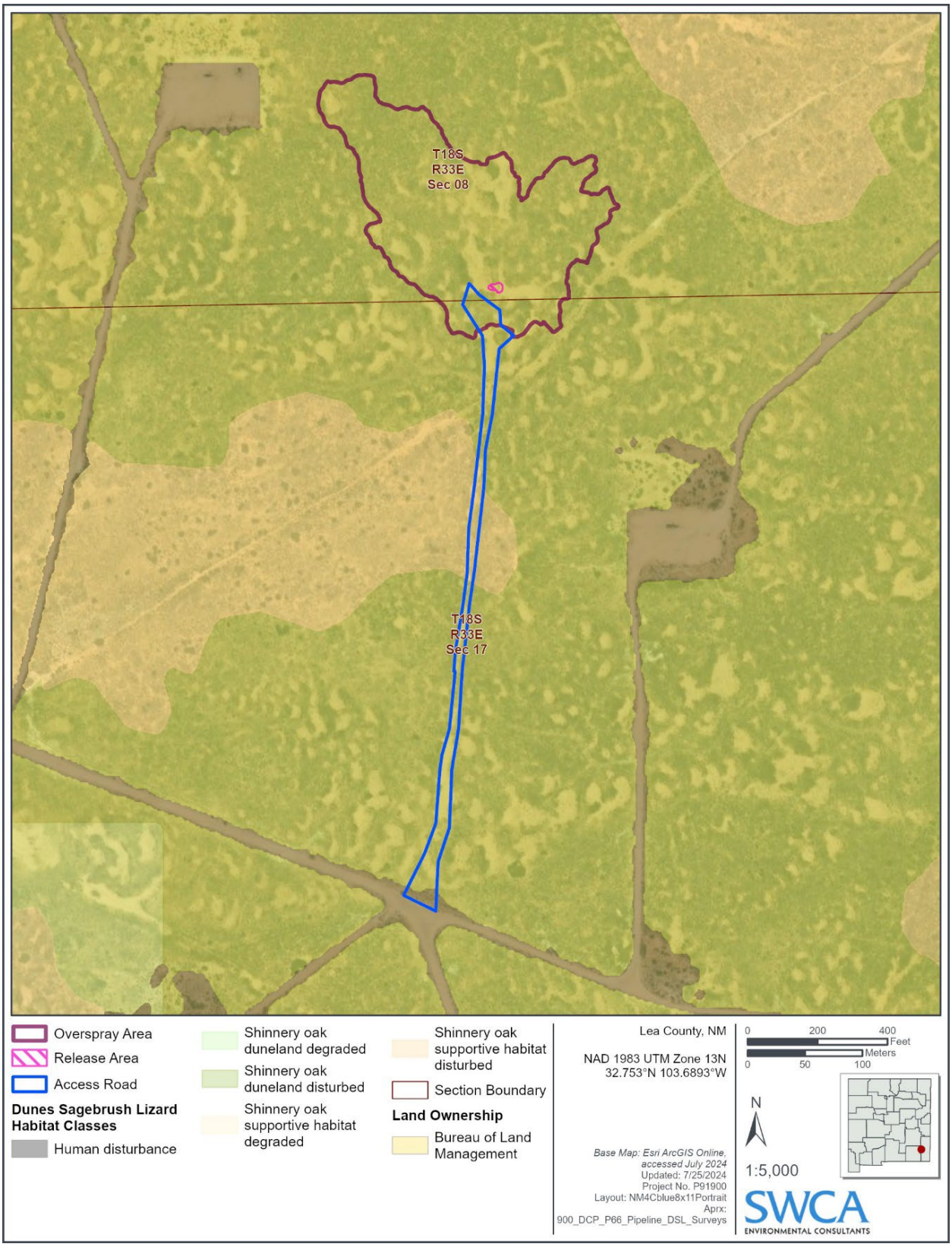

Figure 1. Project area, proposed access pathway, and U.S. Fish and Wildlife Service–modeled dunes sagebrush lizard habitat in the vicinity of the project area.

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METHODS

Dunes Sagebrush Lizard Surveys

Two SWCA biologists, including Nicole Smolensky, identified by the USFWS as the Designated Agent of the Service, conducted a pedestrian survey of DSL in the project area. SWCA biologists walked slowly along 27 transects spaced 10 meters apart, totaling 1.86 miles (Figure 2). The transects spanned sand dunes predominantly vegetated with shinnery oak (*Quercus havardii*) and shinnery oak dominated shrublands (see Figures 1 and 2).

During the survey, SWCA biologists searched for dead or moribund DSL, looking carefully along and under the vegetation while walking. When SWCA biologists detected a live lizard, SWCA biologists would walk as close as possible to the lizard to identify the species. If SWCA biologists detected a DSL within the release area (see Figure 1), SWCA biologists would attempt to capture DSL by hand or noose-pole and relocate DSL to a nearby suitable area. If SWCA biologists detected any dead or moribund DSL, SWCA biologists would donate the specimens for deposition at the Museum of Southwestern Biology at the University of New Mexico in Albuquerque, New Mexico.

SWCA biologists conducted the survey during suitable survey conditions that would facilitate the detection of DSL if present. Daily ambient temperatures were between 80 degrees and 100 degrees Fahrenheit (˚F) (Degenhardt et al. 1996; Fitzgerald and Painter 2009; Fitzgerald et al. 2011; Grant 1990; Sartorius et al. 2002; Sena 1985; Smolensky and Fitzgerald 2006). Surveys were conducted on full sun days when chance of precipitation was low during the survey periods, as well as, 1 day preceding and succeeding the dates of survey (Sartorius et al. 2002; Sena 1985). Surveys were conducted in July, a month when DSL are known to be active (Texas A&M University 2016; Walkup et al. 2017).

Dunes Sagebrush Lizard Habitat Assessment

SWCA biologists first conducted a desktop review of existing conditions of DSL habitat in and around the project area using available imagery on Google Earth (2024) and modeled DSL habitat (USFWS 2024) to support DCPs siting and planning of its remediation activities. SWCA biologists conducted a site visit to ground-truth the desktop review data. SWCA biologists compared present conditions to the current USFWS DSL habitat model (USFWS 2024) and dunal complexes identified on aerial imagery to confirm habitat suitability conditions and identify areas for avoidance. SWCA biologists took geo-referenced photographs to illustrate the consistency of the existing conditions to modeled DSL habitat and aerial imagery (Appendix B).

RESULTS

Dunes Sagebrush Lizard Survey Results

SWCA biologists conducted the surveys on July 30 and July 31, 2024. SWCA biologists conducted the pedestrian surveys each day between approximately 8:00 a.m. and 12:00 p.m. The survey effort consisted of 16-person hours (i.e., total number of hours spent on site × two biologists) of visual searching along the 27 transects that spanned the project area. Weather conditions during the survey period, as recorded by the nearest local weather station (Lea County Regional Airport-KHOB) (Weather Underground 2024), were suitable for DSL activity (Fitzgerald and Painter 2009; Fitzgerald et al. 2011; Sartorius et al. 2002) (Table 1).

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Table 1. Duration of Field Efforts and Weather Conditions

Date	Person-hours	Minimum Daily Air Temperature (˚F)	Maximum Daily Air Temperature (˚F)	Cloud Cover (%)	Average Wind Speed (miles per hour) and Direction
July 30	8	70	100	0%	10 SSE
July 31	8	75	102	0%	12 SE

Source: Weather Underground (2024).

Note: SE = southeast; SSE = south/southeast.

No live or dead DSL were detected during the pedestrian survey. None were detected incidentally outside of the project area while SWCA biologists were en route to the project area or assessing alternative access routes to the project area.

SWCA biologists detected numerous side-blotched lizards (*Uta stansburiana*) of all demographic stages (adults, juveniles, hatchlings, males and females) and numerous marbled whiptail lizards (*Aspidoscelis marmorata*) throughout the access route and overspray area. SWCA biologists detected one lesser earless lizard (*Holbrookia maculata*) in the shinnery oak shrubland in the western portion of the overspray area and one Texas horned lizard (*Phrynosoma cornutum)* along one of the caliche roads en route to the project area.

The release area had very little evidence of current use by wildlife. There were no live, physically wounded, or dead vertebrate wildlife, including lizards in the release area (see Appendix B). There were some live aerial insects flying near to but over the dead vegetation in the release area and a few dead insects in the release area where pooled fluids remain. SWCA biologists also observed some footprints of coyote (*Canas latrans*) and rabbit in the release area.

Immediately adjacent to the release area where the soil was minimally covered with release fluids and where some live vegetation persists, SWCA biologists observed side-blotched lizards, whiptail lizards, and other vertebrate wildlife and insects (see Appendix B).

Dunes Sagebrush Lizard Habitat Assessment Results

SWCA biologists did not detect inconsistencies between the current landscape, aerial imagery, and the USFWS–modeled habitat (USFWS 2024) for DSL. There are some large shinnery oak sand dune complexes and some smaller deflated shinnery oak sand dunes toward the edges of the large shinnery oak sand dune complexes in the project area and along the proposed access route, which is consistent with the model designation of *shinnery oak duneland* (see Figure 1 and Appendix B). There are also areas of shinnery oak shrublands, modeled as *shinnery oak supportive habitat* (see Figure 1 and Appendix B). The relative locations of shinnery oak dunelands and shinnery oak supportive habitat conform to the current landscape.

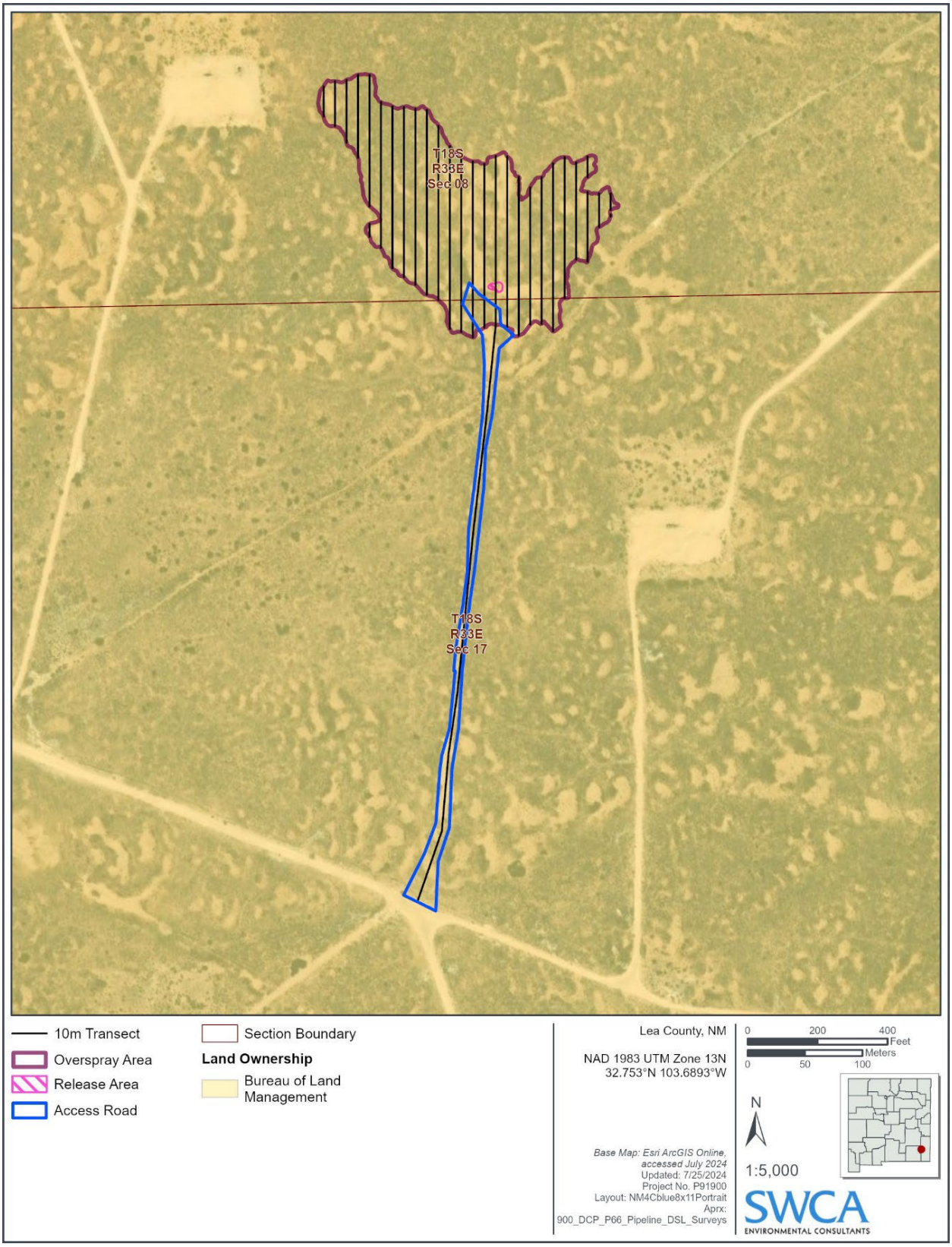

Figure 2. Project area with pedestrian survey transect locations.

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SUGGESTED ACCESS ROUTES TO MINIMIZE OR AVOID IMPACTS TO DUNES SAGEBRUSH LIZARD HABITAT

DSL use shinnery oak dunelands for breeding, feeding, sheltering (Degenhardt and Jones 1972; Fitzgerald et al. 2022; Hill and Fitzgerald 2007; Ryberg et al. 2012; USFWS 2024). Shinnery oak supportive habitat may be used by DSL for dispersal (Fitzgerald et al. 2005; Johnson et al. 2016; USFWS 2024). Although no DSL were detected in shinnery oak dunelands and shinnery oak supportive habitat during the pedestrian survey, project activities may still adversely affect DSL. To minimize effects to DSL, SWCA biologists propose four alternative access routes to the project area (Figure 3). These access routes are intended to skirt or minimally span the shinnery oak duneland and pass through shinnery oak supportive habitat. By doing so, effects to the habitats that support key behaviors of DSL may be minimized. Some routes originate at well pads that may be used for staging. Staging equipment outside of the shinnery oak dunelands where practicable would also minimize impacts to DSL.

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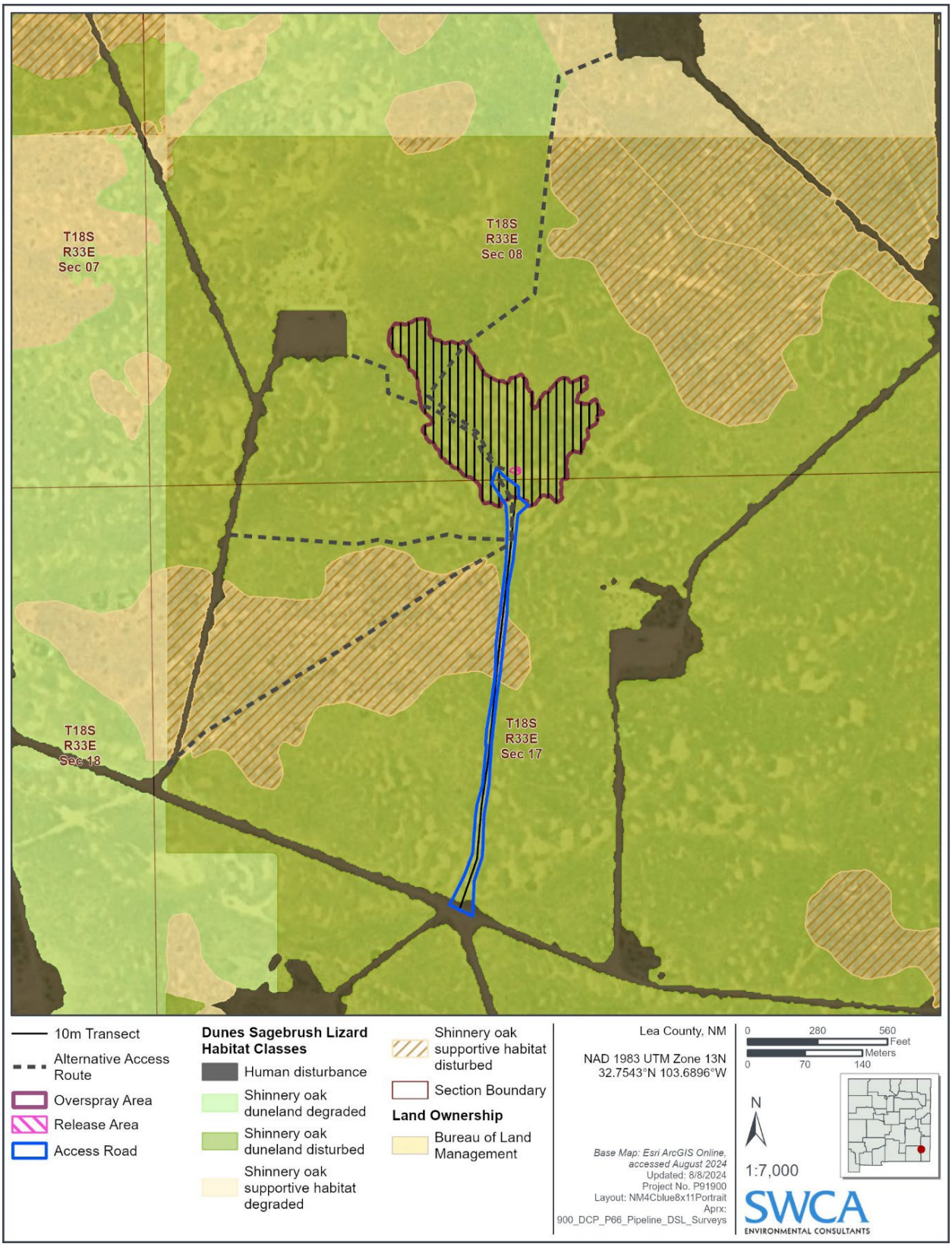

Figure 3. Project area, proposed access pathway, and U.S. Fish and Wildlife Service–modeled dunes sagebrush lizard habitat in the vicinity of the project area.

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APPENDIX A

Designated Agent of the Service Letter

United States Department of the Interior

FISH AND WILDLIFE SERVICE

New Mexico Ecological Services Field Office
2105 Osuna Road NE
Albuquerque, New Mexico 87113
Telephone 505-346-2525 Fax 505-346-2542
www.fws.gov/southwest/es/newmexico/

July 24, 2024

CS6436985-DAS

Nicole Smolensky, Ph.D.
SWCA Environmental Consultants
4407 Monterey Oaks Blvd
Austin, TX 78749

Dear Dr. Smolensky:

The U. S. Fish and Wildlife Service (Service) has received notification of your retention as a qualified biologist to work with the dunes sagebrush lizard (DSL) on the emergency spill cleanup in response to the C-24-1 line produced water release. The Service has also received your permit application for continued research and surveys for the DSL. Due to the listing determination of 'Endangered' becoming effective for the DSL on June 20, 2024, it is not feasible to process your permit application in a time frame concurrent with the survey or recovery needs for the cleanup activities related to the C-24-1 line produced water release. To ensure survey and recovery activities can continue, the Service is issuing this letter which designates the individuals listed below as Designated Agents of the Service for the purposes of conducting DSL survey and recovery in response to the C-24-1 produced water release cleanup while we continue to process your application for a research and recovery permit. In accordance with section 10(a)(1)(A) of the Endangered Species Act (16 U.S.C. 1531 *et seq*.), regulations promulgated thereto, and the Region 2 Regional Director's permits TE676811-0 and ES-704930-3, respectively, individuals identified below are hereby designated as an agent of the Service to engage in the activities specified in this letter which may result in take of the DSL in 2024. This agent designation is strictly limited to the activities and terms and conditions below.

The individuals named in this letter as Authorized Individuals are authorized to conduct DSL surveys under the following conditions:

1. Conduct visual encounter surveys (VES) for lizards and habitat assessment surveys prior to remedial action.

2. If lizards are observed within the excavation area, the biologist may attempt to recover the individual(s) by capturing and relocating them to a nearby suitable area. Data including snout-vent length, tail length, weight, sex, general description of health condition, location collected (GPS), location released (GPS), and photographs should be collected on all captured lizards.

3. Dead or moribund lizards must be collected, preserved, and deposited at the Museum of Southwestern Biology, University of New Mexico, Albuquerque, NM. A copy of this letter must accompany and be maintained with all specimens collected and deposited at the Museum.

4. A qualified biologist, as named on the List of Authorized Individuals of this letter, will be present in the field to perform or directly supervise all DSL recovery or survey activities.

5. A report will be submitted electronically by September 1st to the Ecological Services Field Office that signed this letter (address below). The report must include descriptions of all activities undertaken in response to the emergency cleanup activities related to the C-24-1 line produced water release, including number of surveys performed, method of lizard capture, location DSL individuals were released, and any other data or information collected or referenced above.

Please refer to the letter number CS6436985-DAS, Project Code 2024-0113340, and the date of this letter in all correspondence and reports concerning agent activities. Engagement in activity pursuant to this designation letter constitutes understanding and acceptance of the Terms and Conditions stipulated in this letter.

This letter of authorization expires when the activities necessary to address the C-24-1 line produced water release are completed or at the end of the 2024 DSL survey season, August 15, 2024, whichever comes first. This letter does not relieve the Authorized individuals or SWCA of responsibilities to comply with all other applicable Federal, State, Tribal, and local regulations regarding possession and final disposition of the authorized species.

The following person(s) are covered to work under this Letter of Authorized Individuals:

1. Nicole Smolensky
2. Matthew McMillan
3. Cassandra Aguillard
4. Kelley Reid

Supervised individuals may conduct activities pursuant to this letter only under the direct, on-site supervision of an independently authorized individual listed above. “On-site supervision” is defined as having the authorized individual at a distance that would allow this individual to immediately assist a supervised individual, as needed, while they are conducting an authorized activity.

Any questions you may have regarding this letter should be directed to Marilyn Wright of the New Mexico Ecological Services Field Office at marilyn_wright@fws.gov.

Sincerely,

(For) Shawn Sartorius
Field Supervisor

LIST OF SERVICE CONTACTS:

PROJECT LEADER:

New Mexico Project Leader, nmesfo@fws.gov 2105 Osuna Road NE, Albuquerque, New Mexico 87113 (505) 346-2525

REPORT SUBMISSION | SPECIES LEAD CONTACT:
Report, due by September 1st, submitted electronically:

Dunes sagebrush lizard species lead: marilyn_wright@fws.gov

OFFICES OF LAW ENFORCEMENT:

NM/OK/TX Special Agent in Charge: 500 Gold Avenue SW, Room 9021, Albuquerque, New Mexico 87102-3294 (505) 248-7889

REGIONAL RECOVERY PERMIT COORDINATORS:

Southwest Region 2 Office: permitsR2es@fws.gov
P.O. Box 1306, Albuquerque, NM 87103-1306

APPENDIX B

Photographic Log

Figure B-1. Representative photograph of shinnery oak dunelands along the proposed access road as seen from an offset point; view facing south toward the proposed access route.

Figure B-2. Representative photograph of shinnery oak dunelands in the overspray portion of the project area; view facing south toward the proposed access route.

Figure B-3. Representative photograph of shinnery oak supportive habitat along the proposed access route to the project area; view facing north.

Figure B-4. Representative photograph of shinnery oak supportive habitat along the proposed access route to the project area; view facing west.

Figure B-5. Representative photograph of shinnery oak dunelands in the release area within the project area; view facing north from the proposed access route.

Figure B-6. Representative photograph of shinnery oak dunelands in the release area within the project area; view facing south from a location in the overspray area.

Figure B-7. Representative photograph demonstrating gradation of released fluids across the surface in foreground and background in the project area. Some wildlife tracks present; view facing south.

Figure B-8. Representative photograph demonstrating gradation of released fluids across the surface in foreground and background in the project area. Some wildlife track present; view facing west.

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

CONDITIONS

Action 434004

CONDITIONS

Operator: DCP OPERATING COMPANY, LP 2331 Citywest Blvd Houston, TX 77042	OGRID: 36785
	Action Number: 434004
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

Created By	Condition	Condition Date
scott.rodgers	None	2/20/2025