

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-144
Revised April 3, 2017

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office.
For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Pit, Below-Grade Tank, or
Proposed Alternative Method Permit or Closure Plan Application

Type of action: ☐ Below grade tank registration
☐ Permit of a pit or proposed alternative method
☒ Closure of a pit, below-grade tank, or proposed alternative method
☐ Modification to an existing permit/or registration
☐ Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.
Operator: Enduring Resources, LLC OGRID #: 372286
Address: 200 Energy Court, Farmington, New Mexico 87401
Facility or well name: Marshall A 3
API Number: 30-045-06536 OCD Permit Number: _____
U/L or Qtr/Qtr G Section 15 Township 27N Range 9W County: San Juan
Center of Proposed Design: Latitude 36.578597 Longitude -107.772393 NAD83
Surface Owner: ☐ Federal ☐ State ☐ Private ☒ Tribal Trust or Indian Allotment

2.
☐ **Pit:** Subsection F, G or J of 19.15.17.11 NMAC
Temporary: ☐ Drilling ☐ Workover
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A ☐ Multi-Well Fluid Management Low Chloride Drilling Fluid ☐ yes ☐ no
☐ Lined ☐ Unlined Liner type: Thickness _____ mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other _____
☐ String-Reinforced
Liner Seams: ☐ Welded ☐ Factory ☐ Other _____ Volume: _____ bbl Dimensions: L _____ x W _____ x D _____

3.
☒ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC
Volume: 12 bbl Type of fluid: Produced Water
Tank Construction material: Steel
☐ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☐ Visible sidewalls and liner ☒ Visible sidewalls only ☐ Other _____
Liner type: Thickness _____ mil ☐ HDPE ☐ PVC ☐ Other _____

4.
☐ **Alternative Method:**
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

5.
Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks)
☐ Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school, hospital, institution or church)
☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet
☒ Alternate. Please specify 4' wire field fence

6.

Netting: Subsection E of 19.15.17.11 NMAC (*Applies to permanent pits and permanent open top tanks*)☒ Screen ☐ Netting ☐ Other _____☐ Monthly inspections (If netting or screening is not physically feasible)

7.

Signs: Subsection C of 19.15.17.11 NMAC☒ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers☐ Signed in compliance with 19.15.16.8 NMAC

8.

Variances and Exceptions:

Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.

Please check a box if one or more of the following is requested, if not leave blank:☒ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.☐ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

9.

Siting Criteria (regarding permitting): 19.15.17.10 NMAC**Instructions:** The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.**General siting****Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.**- ☐ NM Office of the State Engineer - iWATERS database search; ☐ USGS; ☒ Data obtained from nearby wells☐ Yes ☐ No
☐ NA**Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.**

NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No
☐ NAWithin incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. (**Does not apply to below grade tanks**)☐ Yes ☐ No

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

Within the area overlying a subsurface mine. (**Does not apply to below grade tanks**)☐ Yes ☐ No

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

Within an unstable area. (**Does not apply to below grade tanks**)☐ Yes ☐ No

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

☐ Yes ☐ NoWithin a 100-year floodplain. (**Does not apply to below grade tanks**)

- FEMA map

Below Grade Tanks

Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).

☐ Yes ☐ No

- Topographic map; Visual inspection (certification) of the proposed site

Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;

☐ Yes ☐ No

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)

Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.)

☐ Yes ☐ No

- Topographic map; Visual inspection (certification) of the proposed site

Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.

☐ Yes ☐ No

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300 feet of any other fresh water well or spring, in existence at the time of the initial application.

☐ Yes ☐ No

NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

Within 100 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Temporary Pit Non-low chloride drilling fluid

Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

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, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application;

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Permanent Pit or Multi-Well Fluid Management Pit

Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 500 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

10.

Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC

Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- ☐ Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

☐ Previously Approved Design (attach copy of design) API Number: _____ or Permit Number: _____

11.

Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC

Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ A List of wells with approved application for permit to drill associated with the pit.
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
- ☐ Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC

☐ Previously Approved Design (attach copy of design) API Number: _____ or Permit Number: _____

12.

Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
☐ Climatological Factors Assessment
☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Quality Control/Quality Assurance Construction and Installation Plan
☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Nuisance or Hazardous Odors, including H₂S, Prevention Plan
☐ Emergency Response Plan
☐ Oil Field Waste Stream Characterization
☐ Monitoring and Inspection Plan
☐ Erosion Control Plan
☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

13.

Proposed Closure: 19.15.17.13 NMAC**Instructions:** Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.

- Type: ☐ Drilling ☐ Workover ☐ Emergency ☐ Cavitation ☐ P&A ☐ Permanent Pit ☐ Below-grade Tank ☐ Multi-well Fluid Management Pit
☐ Alternative
- Proposed Closure Method: ☐ Waste Excavation and Removal
☐ Waste Removal (Closed-loop systems only)
☐ On-site Closure Method (Only for temporary pits and closed-loop systems)
☐ In-place Burial ☐ On-site Trench Burial
☐ Alternative Closure Method

14.

Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) **Instructions:** Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC
☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)
☐ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

15.

Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC**Instructions:** Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.

Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	

adopted pursuant to NMSA 1978, Section 3-27-3, as amended.

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

☐ Yes ☐ No

Within the area overlying a subsurface mine.

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

☐ Yes ☐ No

Within an unstable area.

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

☐ Yes ☐ No

Within a 100-year floodplain.

- FEMA map

☐ Yes ☐ No

16. **On-Site Closure Plan Checklist:** (19.15.17.13 NMAC) *Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.*

- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
☐ Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC
☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 NMAC
☐ Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC
☐ Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC
☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
☐ Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

17. **Operator Application Certification:**

I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

Name (Print): _____ Title: _____

Signature: _____ Date: _____

e-mail address: _____ Telephone: _____

18. **OCD Approval:** ☐ Permit Application (including closure plan) ☒ Closure Plan (only) ☐ OCD Conditions (see attachment)
 Report

OCD Representative Signature: Victoria Venegas **Approval Date:** 11/04/2021

Title: Environmental Specialist **OCD Permit Number:** BGT1

19. **Closure Report (required within 60 days of closure completion):** 19.15.17.13 NMAC

Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.

☒ Closure Completion Date: 8/25/2020

20. **Closure Method:**

- ☒ Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-loop systems only)
☐ If different from approved plan, please explain.

21. **Closure Report Attachment Checklist:** *Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.*

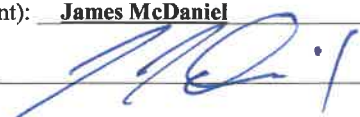
- ☒ Proof of Closure Notice (surface owner and division)
☐ Proof of Deed Notice (required for on-site closure for private land only)
☐ Plot Plan (for on-site closures and temporary pits)
☒ Confirmation Sampling Analytical Results (if applicable)
☐ Waste Material Sampling Analytical Results (required for on-site closure)
☒ Disposal Facility Name and Permit Number
☒ Soil Backfilling and Cover Installation
☒ Re-vegetation Application Rates and Seeding Technique
☒ Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude _____ Longitude _____ NAD: ☐ 1927 ☐ 1983

22.

Operator Closure Certification:

I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.

Name (Print): James McDanielTitle: HSE SupervisorSignature: Date: 9/9/2020e-mail address: jmcDaniel@enduringresources.comTelephone: 505-636-9731

District I
1625 N. French Dr., Hobbs, NM 88240
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811 S. First St., Artesia, NM 88210
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State of New Mexico
Energy Minerals and Natural
Resources Department

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

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

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party: Enduring Resources	OGRID: 372286
Contact Name: James McDaniel	Contact Telephone: (505) 636-9731
Contact email: jmcdaniel@enduringresources.com	Incident # (assigned by OCD)
Contact mailing address: 200 Energy Court	Farmington, New Mexico 87401

Location of Release Source

Latitude 36.578597 Longitude -107.772393
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Marshall A 3	Site Type: Wellsite
Date Release Discovered: 7/29/2020	API# (if applicable) 30-045-06536

Unit Letter	Section	Township	Range	County
G	15	27N	9W	San Juan

Surface Owner: ☐ State ☐ Federal ☒ Tribal ☐ Private (Name: _____)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

☐ Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
☒ Produced Water	Volume Released (bbls): UNK	Volume Recovered (bbls): NONE
	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:

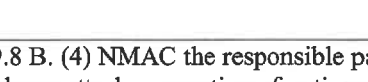
On 7/29/2020, BGT closure activities were performed at this location. Samples were collected from beneath the location of the BGT after it was removed, and samples results were above Tale I Standards, confirming that a release had occurred. A Spill Closure Report will be submitted detailing spill closure activities.

Incident ID	
District RP	
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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>James McDaniel</u> Signature: <u></u> email: <u>jmcDaniel@enduringresources.com</u>	Title: <u>HSE Supervisor</u> Date: <u>9/9/2020</u> Telephone: <u>(505) 636-9731</u>
<u>OCD Only</u> Received by: _____ Date: _____	

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Site Assessment/Characterization

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

What is the shallowest depth to groundwater beneath the area affected by the release?	_____ (ft bgs)
Did this release impact groundwater or surface water?	☐ Yes ☐ No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ☐ No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes ☐ No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ☐ No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ☐ No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ☐ No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ☐ No
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ☐ No
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ☐ No
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ☐ No
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ☐ No
Did the release impact areas 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 1/2-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.

Oil Conservation Division

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District RP	
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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: _____

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	
District RP	
Facility ID	
Application ID	

Closure

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

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

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

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

Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

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: _____

Enduring Resources, LLC Below Grade Tank Closure Report

Lease Name: Marshall A 3

API No.: 30-045-06536

Description: Unit G, Section 15, Township 27N, Range 9W, San Juan County

In accordance with Rule 19.15.17.13 NMAC the following information describes the closure requirements of below-grade tanks on Enduring Resources, LLC. (Enduring) locations. This is Enduring's standard procedure for all below-grade tanks. A separate plan will be submitted for any below-grade tank which does not conform to this plan.

General Plan

1. Enduring will close below-grade tanks within the time periods provided in 19.15.17.13 NMAC, or by an earlier date that the division requires because of imminent danger to fresh water, public health or the environment.
Closure Date is August 25, 2020
2. Enduring will close a below-grade tank that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five years after June 16, 2008, if not retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC.
Closure Date is August 25, 2020
3. Enduring will close a permitted below-grade tank within 60 days of cessation of the below-grade tank's operation or as required by the transitional provisions of Subsection B of 19.15.17.17 NMAC in accordance with a closure plan that the appropriate division district office approves. The closure report will be filed on form C-144.
Required C-144 Form is attached to this document.
4. Enduring will remove liquids and sludge from below-grade tanks prior to implementing a closure method and will dispose of the liquids and sludge in a division-approved facility. Approved facilities and waste streams include:
 - Envirotech Permit No. NM01-0011 and IEI Permit No. NM 01-0010B
 - Soil contaminated by exempt petroleum hydrocarbons
 - Produced sand, pit sludge and contaminated bottoms from storage of exempt wastes
 - Basin Disposal Permit No. NM01-005
 - Produced water**All liquids and sludge were removed from the tank prior to closure activities.**
5. Enduring will remove the below-grade tank and dispose of it in a division approved facility or recycle, reuse, or reclaim it in a manner that the appropriate division district office approves.
Enduring has removed the below grade tank, and will dispose of it at a division approved facility, or recycle, reclaim or reuse it in a manner that is approved by the division.

6. Enduring will remove any on-site equipment associated with a below-grade tank unless the equipment is required for some other purpose.
This location is still in production. All other on-site equipment will be utilized in the continued production of oil and gas.
7. Enduring will test the soils beneath the below-grade tank to determine whether a release has occurred. At a minimum 5 point composite sample will be collected along with individual grab samples from any area that is wet, discolored or showing other evidence of a release. Samples will be analyzed for BTEX, TPH and chlorides to demonstrate that the benzene concentration, as determined by EPA SW-846 methods 8021B or 8260B or EPA method that the division approves, does not exceed 0.2 mg/kg; total BTEX concentration, as determined by EPA SW-846 methods 8021B or 8260B or other EPA method that the division approves, does not exceed 50 mg/kg; the TPH concentration, as determined by EPA method 8015M or other EPA method that the division approves, does not exceed 100mg/kg; and the chloride concentration, as determined by EPA method 9056A or other EPA method that the division approves, does not exceed 250 mg/kg, or the background concentration, whichever is greater. Enduring will notify the division of its results on form C-141.

A release was confirmed visually due to some liquids left in the BGT being spilled out during the BGT removal.

Components	Test Method	Limit (mg/Kg)	Results
Benzene	EPA SW-846 8021B or 8260B	0.2	< 0.025 mg/kg
BTEX	EPA SW-846 8021B or 8260B	50	< 0.1 mg/kg
TPH	EPA SW-846 8015M	100	1,533 mg/kg
Chlorides	EPA 9056A	250 or background	< 20.0

8. If Enduring or the division determines that a release has occurred, Enduring will comply with 19.15.3.116 NMAC and 19.15.1.19NMAC as appropriate.
A release was confirmed for this location due to TPH levels of 1,533 ppm. A separate closure report will be submitted detailing spill closure activities.
9. If the sampling program demonstrates that a release has not occurred or that any release does not exceed the concentrations specified in Paragraph (4) of Subsection E of 19.15.17.13 NMAC, Enduring will backfill the excavation with compacted, non-waste containing, earthen material; construct a division prescribed soil cover; recontour and re-vegetate the site.
The site has been backfilled, and will be recontoured and revegetated upon P&A of the wellsite.
10. Notice of Closure operations will be given to the Aztec Division District III office between 72 hours and one week prior to the start of closure activities via email or verbally.
The notification will include the following:
- i. Operator's name
 - ii. Well Name and API Number
 - iii. Location by Unit Letter, Section, Township, and Range
- Notification was provided to Mr. Cory Smith with the Aztec office of the OCD via email on July 24, 2020; see attached email printout.**

The surface owner shall be notified of Enduring's proposal to close the BGT as per the approved closure plan using certified mail, return receipt requested.

The BLM and FIMO were notified on July 24, 2020 via email; see attached email printout.

11. Re-contouring of location will match fit, shape, line, form and texture of the surrounding area. Re-shaping will include drainage control, prevent ponding, and prevent erosion. Natural drainages will be unimpeded and water bars and/or silt traps will be placed in areas where needed to prevent erosion on a large scale. Final re-contour shall have a uniform appearance with smooth surface, fitting the natural landscape.
This site will be recontoured and revegetated once plugging and abandoning activities have been completed. The site will be recontoured to match the above mentioned specifications.
12. A minimum of 4 feet of cover shall be achieved and the cover shall include 1 foot of suitable material to establish vegetation at the site, or the background thickness of topsoil, whichever is greater.
The area has been backfilled to match these specifications.
13. Enduring will seed the disturbed areas the first growing season after the operator closes the pit. Seeding will be accomplished via drilling on the contour whenever practical or by other division-approved methods. BLM or Forest Service stipulated seed mixes will be used on federal lands. Vegetative cover will equal 70% of the native perennial vegetative cover (un-impacted) consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintain that cover through two successive growing seasons. Repeat seeding or planting will be continued until successful vegetative growth occurs.
The site will be re-seeded per the FIMO requirements once plugging and abandoning activities have been completed.
14. All closure activities will include proper documentation and be available for review upon request and will be submitted in closure report form to OCD within 60 days of closure of the below-grade tank. Closure report will be filed on form C-144 and incorporate the following:
 - Proof of closure notice to division and surface owner; **attached**
 - Details on capping and covering, where applicable; **per OCD Specifications**
 - Confirmation sampling analytical results; **attached**
 - Disposal facility name(s) and permit number(s); **attached**
 - Soil backfilling and cover installation; **per OCD Specifications**
 - Re-vegetation application rates and seeding techniques, (or approved alternative to re-vegetation requirements if applicable); **pursuant to FIMO requirements**
 - Photo documentation of the site reclamation. **attached**

Mr. Cory Smith
Oil Conservation Division
1000 Rio Brazos Rd.
Aztec, New Mexico 87410
Email: cory.smith@state.nm.us
Phone (505) 334-6178 Ext 115

Re: Variance Request for 19.15.17 NMAC Table I and Table II

Mr. Smith,

Please accept this letter as a variance request as outlined in 19.15.17.15(A) NMAC. Enduring Resources, LLC (Enduring) would like to request the replacement of USEPA Method 418.1 for the analysis of Total Petroleum Hydrocarbons (TPH) for USEPA Method 8015M, measuring carbon ranges C6-C36, for all sampling associated with closures and confirmations samples in relation to 19.15.17 NMAC, both in Table I and Table II (2103) and the 'pit rule' passed in 2008. Enduring is requesting this variance on the grounds that USEPA Method 418.1 is an outdated analytical method that reports a full range of hydrocarbons from C5 through C40 (*Reference: American Petroleum Institute*).

The attached table demonstrates the carbon ranges, and the typical hydrocarbon products that can be found in those ranges. As you can see, lube oil ranges from C28-C35. Analytical Method USEPA 418.1 extends past lube oils from C35 through C40. This range of hydrocarbons is above the range that can reasonably be expected to be found in our field in both drilling pits and beneath below grade tanks. USEPA Method 8015M (GRO/DRO + extended analysis) will report hydrocarbons ranging from C6-C10 for GRO, C10- C28 for DRO, and C28-C36 for extended analysis. This information was provided by Environmental Science Corporation Laboratories. As the information demonstrates, the 8015M analytical method reports as low as C6, reporting lower than USEPA Method 418.1. Utilizing analytical method 8015M, lighter range hydrocarbons will be reported instead of higher range, heavy hydrocarbons that may not be reasonably expected to be found in our field. Utilization of USEPA Method 8015M will better protect groundwater resources by identifying lighter, more mobile hydrocarbons that USEPA Method 418.1 cannot identify. The heavier range hydrocarbons, C36-C40, that are not identified by USEPA Method 8015M are not a mobile form of hydrocarbon, and are not a threat to human health and the environment. With your acceptance of this variance request, Enduring Resources will begin utilizing USEPA Method 8015M in place of USEPA Method 418.1 for all sampling activities associated with 19.15.17 NMAC, both from the rules passed in 2008 and 2013.

Respectfully Submitted,

James McDaniel, CHMM #15676
HSE Supervisor
Enduring Resources, LLC

Carbon Ranges of Typical Hydrocarbons

Hydrocarbon Carbon Range

Condensate C2-C12

Aromatics C5-C7

Gasoline C7-C11

Kerosene C6-C16

Diesel Fuel C8-C21

Fuel Oil #1 C9-C16

Fuel Oil #2 C11-C20

Heating Oil C14-C20

Lube Oil C28-C35





James McDaniel

From: James McDaniel
Sent: Friday, July 24, 2020 12:48 PM
To: 'Smith, Cory, EMNRD'; 'Abiodun Emmanuel Adeloje'; 'Maureen Joe'
Cc: Heather Huntington; David Rogers; Kyle Walter
Subject: RE: Below Grade Tank Closure Notifications

Ladies and Gentlemen,

Please accept this email as the required notification for below grade tank closure activities at the two wells below:

John Charles 2, 30-045-06480, located in Section 13E, Township 27N, Range 9W, San Juan County, New Mexico.

Marshall A 3, 30-045-06536, located in Section 15G, Township 27N, Range 9W, San Juan County, New Mexico.

Closure activities will begin at 10 AM at the Marshall A 3, with the John Charles 2 closure activities taking place immediately following. Thank you for your time in regards to this matter.

**Closure activities will take place on Wednesday, July 29, 2020.*

James McDaniel
HSE Supervisor
Enduring Resources

CSP #30009

CHMM #15676

CIT #13805

Office: 505-636-9731

Cell: 505-444-3004

jmcdaniel@enduringresources.com



From: James McDaniel
Sent: Friday, July 24, 2020 12:47 PM
To: 'Smith, Cory, EMNRD' <Cory.Smith@state.nm.us>; 'Abiodun Emmanuel Adeloje' <aadeloje@blm.gov>; 'Maureen Joe' <maureen.joe@bia.gov>
Cc: Heather Huntington <Hhuntington@enduringresources.com>; David Rogers <DRogers@enduringresources.com>; Kyle Walter <KWalter@enduringresources.com>
Subject: Below Grade Tank Closure Notifications

Ladies and Gentlemen,

Please accept this email as the required notification for below grade tank closure activities at the two wells below:

John Charles 2, 30-045-06480, located in Section 13E, Township 27N, Range 9W, San Juan County, New Mexico.

Marshall A 3, 30-045-06536, located in Section 15G, Township 27N, Range 9W, San Juan County, New Mexico.

Closure activities will begin at 10 AM at the Marshall A 3, with the John Charles 2 closure activities taking place immediately following. Thank you for your time in regards to this matter.

James McDaniel

HSE Supervisor

Enduring Resources

CSP #30009

CHMM #15676

CIT #13805

Office: 505-636-9731

Cell: 505-444-3004

jmcdaniel@enduringresources.com





Analytical Report

Report Summary

Client: Enduring Resources, LLC

Samples Received: 7/29/2020

Job Number: 17065-0017

Work Order: P007079

Project Name/Location: Marshall A3

Report Reviewed By:

A handwritten signature in black ink, appearing to read 'Walter Hinchman', is written over a horizontal line.

Date: 7/31/20

Walter Hinchman, Laboratory Director



Envirotech Inc. certifies the test results meet all requirements of TNI unless footnoted otherwise.
Statement of Data Authenticity: Envirotech, Inc, attests the data reported has not been altered in any way.
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Envirotech, Inc, holds the Utah TNI certification NM009792018-1 for the data reported.
Envirotech, Inc, holds the Texas TNI certification T104704557-19-2 for the data reported.





Enduring Resources, LLC
511 16th Street, Suite 700
Denver CO, 80202

Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
07/31/20 10:36

Sample Summary

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
BGT Composite	P007079-01A	Soil	07/29/20	07/29/20	Glass Jar, 4 oz.

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Enduring Resources, LLC	Project Name:	Marshall A3	Reported: 07/31/20 10:36
511 16th Street, Suite 700	Project Number:	17065-0017	
Denver CO, 80202	Project Manager:	James McDaniel	

**BGT Composite
P007079-01 (Solid)**

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg				Batch: 2031011
Benzene	ND	0.0250	1	07/29/20	07/29/20	
Toluene	ND	0.0250	1	07/29/20	07/29/20	
Ethylbenzene	ND	0.0250	1	07/29/20	07/29/20	
p,m-Xylene	ND	0.0500	1	07/29/20	07/29/20	
o-Xylene	ND	0.0250	1	07/29/20	07/29/20	
Total Xylenes	ND	0.0250	1	07/29/20	07/29/20	
Surrogate: 4-Bromochlorobenzene-PID	103 %	50-150		07/29/20	07/29/20	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg				Batch: 2031011
Gasoline Range Organics (C6-C10)	ND	20.0	1	07/29/20	07/29/20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	91.9 %	50-150		07/29/20	07/29/20	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg				Batch: 2031015
Diesel Range Organics (C10-C28)	433	25.0	1	07/29/20	07/29/20	
Oil Range Organics (C28-C40)	1100	50.0	1	07/29/20	07/29/20	
Surrogate: n-Nonane	98.9 %	50-200		07/29/20	07/29/20	
Anions by EPA 300.0/9056A	mg/kg	mg/kg				Batch: 2031012
Chloride	ND	20.0	1	07/29/20	07/29/20	

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Enduring Resources, LLC
511 16th Street, Suite 700
Denver CO, 80202

Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
07/31/20 10:36

Volatile Organics by EPA 8021B - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	

Blank (2031011-BLK1)

Prepared & Analyzed: 07/29/20 1

Benzene	ND	0.0250
Toluene	ND	0.0250
Ethylbenzene	ND	0.0250
p,m-Xylene	ND	0.0500
o-Xylene	ND	0.0250
Total Xylenes	ND	0.0250

Surrogate: 4-Bromochlorobenzene-PID 8.16 8.00 102 50-150

LCS (2031011-BS1)

Prepared & Analyzed: 07/29/20 1

Benzene	5.16	0.0250	5.00	103	70-130
Toluene	5.18	0.0250	5.00	104	70-130
Ethylbenzene	5.15	0.0250	5.00	103	70-130
p,m-Xylene	10.3	0.0500	10.0	103	70-130
o-Xylene	5.17	0.0250	5.00	103	70-130
Total Xylenes	15.5	0.0250	15.0	103	0-200

Surrogate: 4-Bromochlorobenzene-PID 8.54 8.00 107 50-150

Matrix Spike (2031011-MS1)

Source: P007075-01

Prepared & Analyzed: 07/29/20 1

Benzene	4.95	0.0250	5.00	ND	99.0	54.3-133
Toluene	4.95	0.0250	5.00	ND	99.0	61.4-130
Ethylbenzene	4.93	0.0250	5.00	ND	98.6	61.4-133
p,m-Xylene	9.87	0.0500	10.0	ND	98.7	63.3-131
o-Xylene	4.93	0.0250	5.00	ND	98.6	63.3-131
Total Xylenes	14.8	0.0250	15.0	ND	98.7	0-200

Surrogate: 4-Bromochlorobenzene-PID 8.17 8.00 102 50-150

Matrix Spike Dup (2031011-MSD1)

Source: P007075-01

Prepared & Analyzed: 07/29/20 1

Benzene	5.24	0.0250	5.00	ND	105	54.3-133	5.71	20
Toluene	5.22	0.0250	5.00	ND	104	61.4-130	5.30	20
Ethylbenzene	5.19	0.0250	5.00	ND	104	61.4-133	5.17	20
p,m-Xylene	10.4	0.0500	10.0	ND	104	63.3-131	5.12	20
o-Xylene	5.20	0.0250	5.00	ND	104	63.3-131	5.28	20
Total Xylenes	15.6	0.0250	15.0	ND	104	0-200	5.17	200

Surrogate: 4-Bromochlorobenzene-PID 8.20 8.00 102 50-150

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Enduring Resources, LLC	Project Name:	Marshall A3	Reported: 07/31/20 10:36
511 16th Street, Suite 700	Project Number:	17065-0017	
Denver CO, 80202	Project Manager:	James McDaniel	

Nonhalogenated Organics by EPA 8015D - GRO - Quality Control

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	REC %	REC Limits %	RPD %	RPD Limit %	Notes
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Blank (2031011-BLK1)

Prepared & Analyzed: 07/29/20 1

Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.51		8.00		93.9	50-150			

LCS (2031011-BS2)

Prepared & Analyzed: 07/29/20 1

Gasoline Range Organics (C6-C10)	47.5	20.0	50.0		95.0	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.42		8.00		92.7	50-150			

Matrix Spike (2031011-MS2)

Source: P007075-01

Prepared & Analyzed: 07/29/20 1

Gasoline Range Organics (C6-C10)	50.7	20.0	50.0	ND	101	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.58		8.00		94.8	50-150			

Matrix Spike Dup (2031011-MSD2)

Source: P007075-01

Prepared & Analyzed: 07/29/20 1

Gasoline Range Organics (C6-C10)	48.8	20.0	50.0	ND	97.6	70-130	3.83	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.51		8.00		93.9	50-150			

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Enduring Resources, LLC	Project Name:	Marshall A3	
511 16th Street, Suite 700	Project Number:	17065-0017	Reported:
Denver CO, 80202	Project Manager:	James McDaniel	07/31/20 10:36

Nonhalogenated Organics by EPA 8015D - DRO/ORO - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	

Blank (2031015-BLK1)

Prepared & Analyzed: 07/29/20 1

Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C40)	ND	50.0							
Surrogate: n-Nonane	52.4		50.0		105	50-200			

LCS (2031015-BS1)

Prepared: 07/29/20 1 Analyzed: 07/29/20 2

Diesel Range Organics (C10-C28)	470	25.0	500		94.1	38-132			
Surrogate: n-Nonane	52.6		50.0		105	50-200			

Matrix Spike (2031015-MS1)

Source: P007079-01 Prepared: 07/29/20 1 Analyzed: 07/29/20 2

Diesel Range Organics (C10-C28)	947	25.0	500	433	103	38-132			
Surrogate: n-Nonane	48.8		50.0		97.6	50-200			

Matrix Spike Dup (2031015-MSD1)

Source: P007079-01 Prepared: 07/29/20 1 Analyzed: 07/29/20 2

Diesel Range Organics (C10-C28)	984	25.0	500	433	110	38-132	3.83	20	
Surrogate: n-Nonane	48.8		50.0		97.5	50-200			

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Enduring Resources, LLC	Project Name:	Marshall A3	
511 16th Street, Suite 700	Project Number:	17065-0017	Reported:
Denver CO, 80202	Project Manager:	James McDaniel	07/31/20 10:36

Anions by EPA 300.0/9056A - Quality Control

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	REC %	REC Limits %	RPD %	RPD Limit %	Notes
Blank (2031012-BLK1)					Prepared & Analyzed: 07/29/20 1				
Chloride	ND	20.0							
LCS (2031012-BS1)					Prepared & Analyzed: 07/29/20 1				
Chloride	252	20.0	250		101	90-110			
Matrix Spike (2031012-MS1)					Source: P007075-01 Prepared & Analyzed: 07/29/20 1				
Chloride	353	20.0	250	97.6	102	80-120			
Matrix Spike Dup (2031012-MSD1)					Source: P007075-01 Prepared & Analyzed: 07/29/20 1				
Chloride	353	20.0	250	97.6	102	80-120	0.00283	20	

QC Summary Report Comment:

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

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Enduring Resources, LLC	Project Name:	Marshall A3	
511 16th Street, Suite 700	Project Number:	17065-0017	Reported:
Denver CO, 80202	Project Manager:	James McDaniel	07/31/20 10:36

Notes and Definitions

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

RPD Relative Percent Difference

** Methods marked with ** are non-accredited methods.

Soil data is reported on an "as received" weight basis, unless reported otherwise.

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Page 1 of 9



envirotech
Analytical Laboratory

5795 US Highway 64, Farmington, NM 87401
24 Hour Emergency Response Phone (602) 302-1879

Ph (905) 532-1861 Fax (505) 532-1865

envirotech-inc.com
labordm@envirotech-inc.com



Enduring Resources, LLC
BGT Closure Report
Marshall A 3
30-045-06536



PHOTO 1: Visual Confirmation of Release Occurring During BGT Removal



PHOTO 2: Former BGT Location after Removal (7/29/2020)



Enduring Resources, LLC
BGT Closure Report
Marshall A 3
30-045-06536

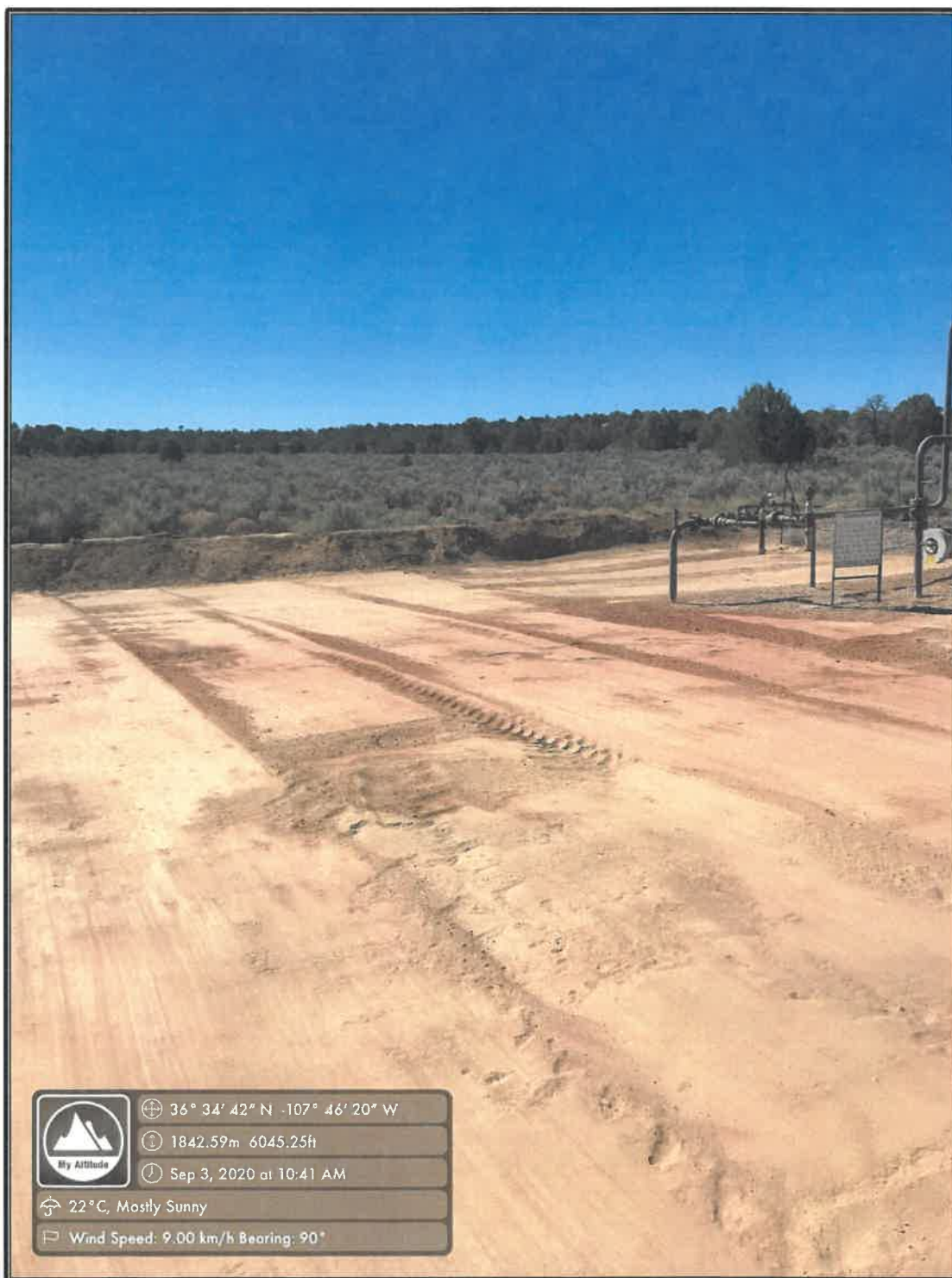


PHOTO 3: BGT Area after Backfill

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	NRM2025557321
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party: Enduring Resources	OGRID: 372286
Contact Name: James McDaniel	Contact Telephone: (505) 636-9731
Contact email: jmcDaniel@enduringresources.com	Incident # (assigned by OCD)
Contact mailing address: 200 Energy Court	Farmington, New Mexico 87401

Location of Release Source

Latitude 36.578597 Longitude -107.772393
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Marshall A 3	Site Type: Wellsite
Date Release Discovered: 7/29/2020	API# (if applicable) 30-045-06536

Unit Letter	Section	Township	Range	County
G	15	27N	9W	San Juan

Surface Owner: ☐ State ☐ Federal ☒ Tribal ☐ Private (Name: _____)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

☐ Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
☒ Produced Water	Volume Released (bbls): UNK	Volume Recovered (bbls): NONE
	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:

On 7/29/2020, BGT closure activities were performed at this location. Samples were collected from beneath the location of the BGT after it was removed, and samples results were above Tale I Standards, confirming that a release had occurred. Excavation was performed, and the spill was remediated. An outline of all remediation activities are detailed in the attached *Remediation Narrative*.

State of New Mexico
Oil Conservation Division

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: _____	Title: _____
Signature: _____	Date: _____
email: _____	Telephone: _____
<u>OCD Only</u> Received by: <u>Ramona Marcus</u> Date: <u>9/11/2020</u>	

Incident ID	
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization

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

What is the shallowest depth to groundwater beneath the area affected by the release?	_____ (ft bgs)
Did this release impact groundwater or surface water?	☐ Yes ☐ No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ☐ No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes ☐ No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ☐ No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ☐ No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ☐ No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ☐ No
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ☐ No
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ☐ No
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ☐ No
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ☐ No
Did the release impact areas 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.

Oil Conservation Division

Incident ID	
District RP	
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: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

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	NRM2025557321
District RP	
Facility ID	
Application ID	

Closure

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

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

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

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

Printed Name: James McDaniel Title: HSE Supervisor
Signature:  Date: 9/9/2020
email: jmcDaniel@enduringresources.com Telephone: 505-636-9731

OCD Only

Received by: Ramona Marcus Date: 9/11/2020

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: _____

NRM2025557321

Marshall A 3 Narrative

7/29/2020

BGT Activities occurred at the Marshall A 3 due to an unused BGT. The BGT was removed, and a closure sample was collected beneath the former location of the BGT. The BGT Closure Sample returned results above the Table I standards for this location, confirming that a release had occurred; see *Table I Analytical Results* and the *Sampling Map*. Abiodun Adeloye with the Farmington Field Office of the BLM was on-site to witness sample collection.

7/31/2020

Excavation was performed, excavating the former BGT area to extents of 8' x 5' x 2' deep. Impacted soil sent to Envirotech for disposal. Notification was submitted to the BLM, NMOCD and FIMO via email to inform of the date of closure sampling, see *Email Notification Printouts*.

8/3/2020

Additional sampling performed on the excavated area. One (1) composite sample was collected from the bottom of the excavation, and one (1) composite sample was collected of the four (4) walls of the excavation. These samples were submitted to Envirotech for analysis. Abiodun Adeloye with the Farmington Field Office of the BLM was on-site to witness sample collection.

8/10/2020

Both samples returned results above the Table I Standards for this location, indicating that additional excavation would be required; see attached *Analytical Results* and *Sampling Map*.

8/11/2020

Additional excavation occurred at this site, extending the excavated area to extents of 8' x 10' x 5' deep. Notification was submitted to the BLM, NMOCD and FIMO via email to inform of the date of closure sampling, see *Email Notification Printouts*.

8/13/2020

Additional sampling was performed on the excavated area. One (1) composite sample was collected from the bottom at 5' deep, and one (1) composite sample was collected of each of the four (4) walls of the excavation. Five (5) total composite samples were collected from the excavation, and were submitted to Envirotech for analysis. Abiodun Adeloye with the Farmington Field Office of the BLM was on-site to witness sample collection.

8/20/2020

Analytical result of samples collected on 8/13/2020 indicated that three (3) of the samples collected returned results below the Table I Standards for this location; see attached *Analytical*

Results and Table I Analytical Results. Two (2) samples returned results above Table I standards. The composite sample from the South Wall of the excavation, and from the bottom of the excavation both returned results above the 100 mg/kg TPH standards determined for this location; see attached *Analytical Results* and *Table I Analytical Results*

8/21/2020

Notification was submitted to the BLM, NMOCD and FIMO via email to inform of the date of closure sampling, see *Email Notification Printouts*.

8/24/2020

Additional excavation occurred at this site, extending the excavated area to extents of 10' x 10' x 9' deep.

8/25/2020

Additional sampling was performed on the excavated area. One (1) composite sample was collected from the bottom at 9' deep, and one (1) composite sample was collected of the south wall of the excavation. Two (2) total samples were collected from the excavation, and were submitted to Envirotech for analysis. Abiodun Adelaye with the Farmington Field Office of the BLM was on-site to witness sample collection.

8/27/2020

Sample results indicated that all samples had returned results below the Table I results determined for this site. No further excavation is required; see attached *Analytical Results* and *Table I Analytical Results*

9/3/2020

Excavated area was backfilled and recontoured to meet NMOCD specifications; see attached *Photo Page*.

Table I Analytical Results - Marshall A 3

Sample Name	Description	Date	DRO	GRO	ORO	Total TPH	Benzene	Toluene	Ethylbenzene	Xylenes	Total BTEX		Chlorides	Square Footage
											50	600		
	Top 4'	NA	NA	NA	NA	100	10	NA	NA	NA	ppm	ppm	ppm	200 sq. ft
BGT Composite	BGT Composite	7/29/2020	433	< 20	1100	1533.0	< 0.0250	< 0.0250	< 0.0250	< 0.0250	< 0.1	< 20	< 20	NA
Wall Composite	8' x 5' x 2' deep	8/3/2020	476	< 20	1150	1626.0	< 0.0250	< 0.0250	< 0.0250	< 0.0250	< 0.1	< 20	< 20	40
Bottom Composite	8' x 5' x 2' deep	8/3/2020	38	< 20	89.1	127.1	< 0.0250	< 0.0250	< 0.0250	< 0.0250	< 0.1	< 20	< 20	52
South Wall	8' x 10' x 5' deep	8/13/2020	391	< 20	977	1368.0	< 0.0250	< 0.0250	< 0.0250	< 0.0250	< 0.1	< 20	< 20	50
East Wall	8' x 10' x 5' deep	8/13/2020	< 25	< 20	< 50	< 95	< 0.0250	< 0.0250	< 0.0250	< 0.0250	< 0.1	< 20	< 20	40
West Wall	8' x 10' x 5' deep	8/13/2020	< 25	< 20	< 50	< 95	< 0.0250	< 0.0250	< 0.0250	< 0.0250	< 0.1	< 20	< 20	40
North Wall	8' x 10' x 5' deep	8/13/2020	< 25	< 20	< 50	< 95	< 0.0250	< 0.0250	< 0.0250	< 0.0250	< 0.1	< 20	< 20	50
Bottom @ 5'	8' x 10' x 5' deep	8/13/2020	32	< 20	78.4	110.4	< 0.0250	< 0.0250	< 0.0250	< 0.0250	< 0.1	< 20	< 20	80
Bottom 9'	10' x 10' x 9' deep	8/25/2020	< 25	< 20	< 50	< 95	< 0.0250	< 0.0250	< 0.0250	< 0.0250	< 0.1	< 20	< 20	100
South Wall	10' x 10' x 9' deep	8/25/2020	< 25	< 20	< 50	< 95	< 0.0250	< 0.0250	< 0.0250	< 0.0250	< 0.1	< 20	< 20	90

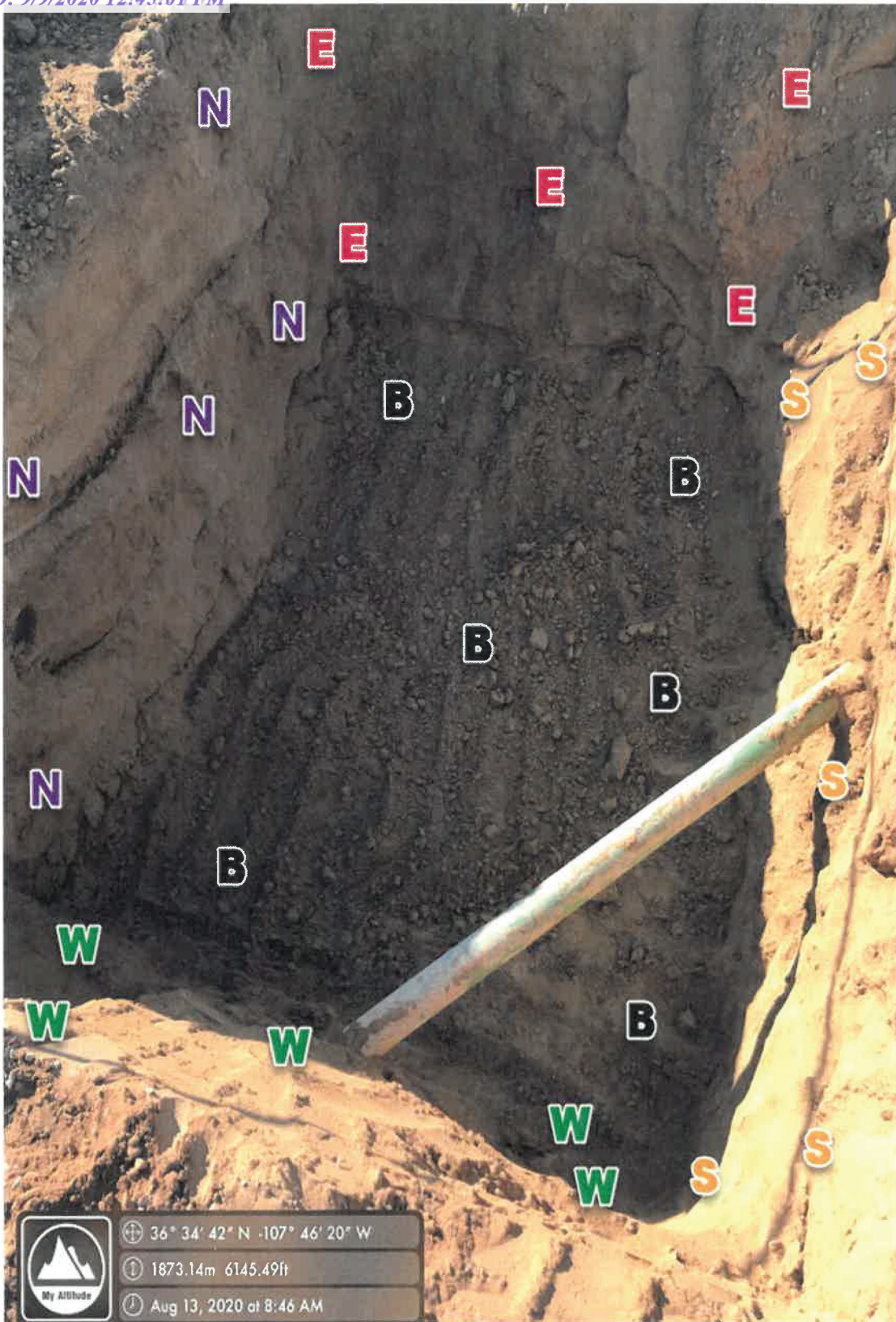
CLOSURE SAMPLES





8/3/2020





B = Bottom 9'
N = North Wall
E = East Wall
S = South Wall
W = West Wall

James McDaniel

From: James McDaniel
Sent: Friday, July 24, 2020 12:48 PM
To: 'Smith, Cory, EMNRD'; 'Abiodun Emmanuel Adeloye'; 'Maureen Joe'
Cc: Heather Huntington; David Rogers; Kyle Walter
Subject: RE: Below Grade Tank Closure Notifications

Ladies and Gentlemen,

Please accept this email as the required notification for below grade tank closure activities at the two wells below:

John Charles 2, 30-045-06480, located in Section 13E, Township 27N, Range 9W, San Juan County, New Mexico.

Marshall A 3, 30-045-06536, located in Section 15G, Township 27N, Range 9W, San Juan County, New Mexico.

Closure activities will begin at 10 AM at the Marshall A 3, with the John Charles 2 closure activities taking place immediately following. Thank you for your time in regards to this matter.

**Closure activities will take place on Wednesday, July 29, 2020.*

James McDaniel
HSE Supervisor
Enduring Resources

CSP #30009

CHMM #15676

CIT #13805

Office: 505-636-9731

Cell: 505-444-3004

jmcdaniel@enduringresources.com



From: James McDaniel
Sent: Friday, July 24, 2020 12:47 PM
To: 'Smith, Cory, EMNRD' <Cory.Smith@state.nm.us>; 'Abiodun Emmanuel Adeloye' <aadeloye@blm.gov>; 'Maureen Joe' <maureen.joe@bia.gov>
Cc: Heather Huntington <Hhuntington@enduringresources.com>; David Rogers <DRogers@enduringresources.com>; Kyle Walter <KWalter@enduringresources.com>
Subject: Below Grade Tank Closure Notifications

Ladies and Gentlemen,

Please accept this email as the required notification for below grade tank closure activities at the two wells below:

John Charles 2, 30-045-06480, located in Section 13E, Township 27N, Range 9W, San Juan County, New Mexico.

Marshall A 3, 30-045-06536, located in Section 15G, Township 27N, Range 9W, San Juan County, New Mexico.

Closure activities will begin at 10 AM at the Marshall A 3, with the John Charles 2 closure activities taking place immediately following. Thank you for your time in regards to this matter.

James McDaniel

HSE Supervisor

Enduring Resources

CSP #30009

CHMM #15676

CIT #13805

Office: 505-636-9731

Cell: 505-444-3004

jmcdaniel@enduringresources.com



James McDaniel

From: James McDaniel
Sent: Friday, July 31, 2020 7:32 AM
To: 'Smith, Cory, EMNRD'; 'Abiodun Emmanuel Adeloye'; 'Maureen Joe'
Cc: Heather Huntington; David Rogers
Subject: Re-Sampling of BGT Closures

The samples collected from below the BGTs at the Marshall A 3 and the John Charles 2 were elevated for DRO/ORO above the 100 ppm TPH requirements in the top 4 feet of soil. Additional excavation will occur on these two locations today, and closure sampling will occur at 10 AM on Monday, +August 3 at the Marshall A 3, with the sampling at the John Charles 2 following immediately afterwards. Thank you.

James McDaniel
HSE Supervisor
Enduring Resources
CSP #30009
CHMM #15676
CIT #13805
Office: 505-636-9731
Cell: 505-444-3004
jmcdaniel@enduringresources.com



James McDaniel

From: James McDaniel
Sent: Tuesday, August 11, 2020 7:26 AM
To: 'Smith, Cory, EMNRD'; 'Abiodun Emmanuel Adeloje'
Cc: 'Maureen Joe'
Subject: Marshall A 3

Gentlemen,

The re-sampling of the BGT closure at the Marshall A 3 returned results above standards for TPH. Additional excavation will take place today, and a re-sampling for closure will occur on Thursday, 8/13/2020 at 8:30 AM. Thank you for your time in regards to this matter.

James McDaniel
HSE Supervisor
Enduring Resources
CSP #30009
CHMM #15676
CIT #13805
Office: 505-636-9731
Cell: 505-444-3004
jmcdaniel@enduringresources.com



James McDaniel

From: James McDaniel
Sent: Friday, August 21, 2020 11:05 AM
To: 'Smith, Cory, EMNRD'; Abiodun Emmanuel Adeloye
Cc: Kyle Walter
Subject: Marshall A 3 BGT Closure
Attachments: Sample Results 8-13-2020.pdf

Two of the samples from the Marshall A 3 failed the 100 ppm TPH standard for this location. The South Wall and the Bottom at 5' below ground surface. Additional excavation will take place on these areas on Monday, August 24, and sampling will occur on Tuesday August 25th at 9 AM. Thank you for your time in regards to this matter. Sample results are included for your reference.

James McDaniel
HSE Supervisor
Enduring Resources
CSP #30009
CHMM #15676
CIT #13805
Office: 505-636-9731
Cell: 505-444-3004
jmcdaniel@enduringresources.com





Enduring Resources, LLC
BGT Closure Report
Marshall A 3
30-045-06536



PHOTO 1: Visual Confirmation of Release Occurring During BGT Removal



PHOTO 2: Former BGT Location after Removal (7/29/2020)



Enduring Resources, LLC
BGT Closure Report
Marshall A 3
30-045-06536



PHOTO 3: Excavated Area (8/3/2020)



Enduring Resources, LLC
BGT Closure Report
Marshall A 3
30-045-06536



PHOTO 4: Excavated Area (8/13/2020)



Enduring Resources, LLC
BGT Closure Report
Marshall A 3
30-045-06536

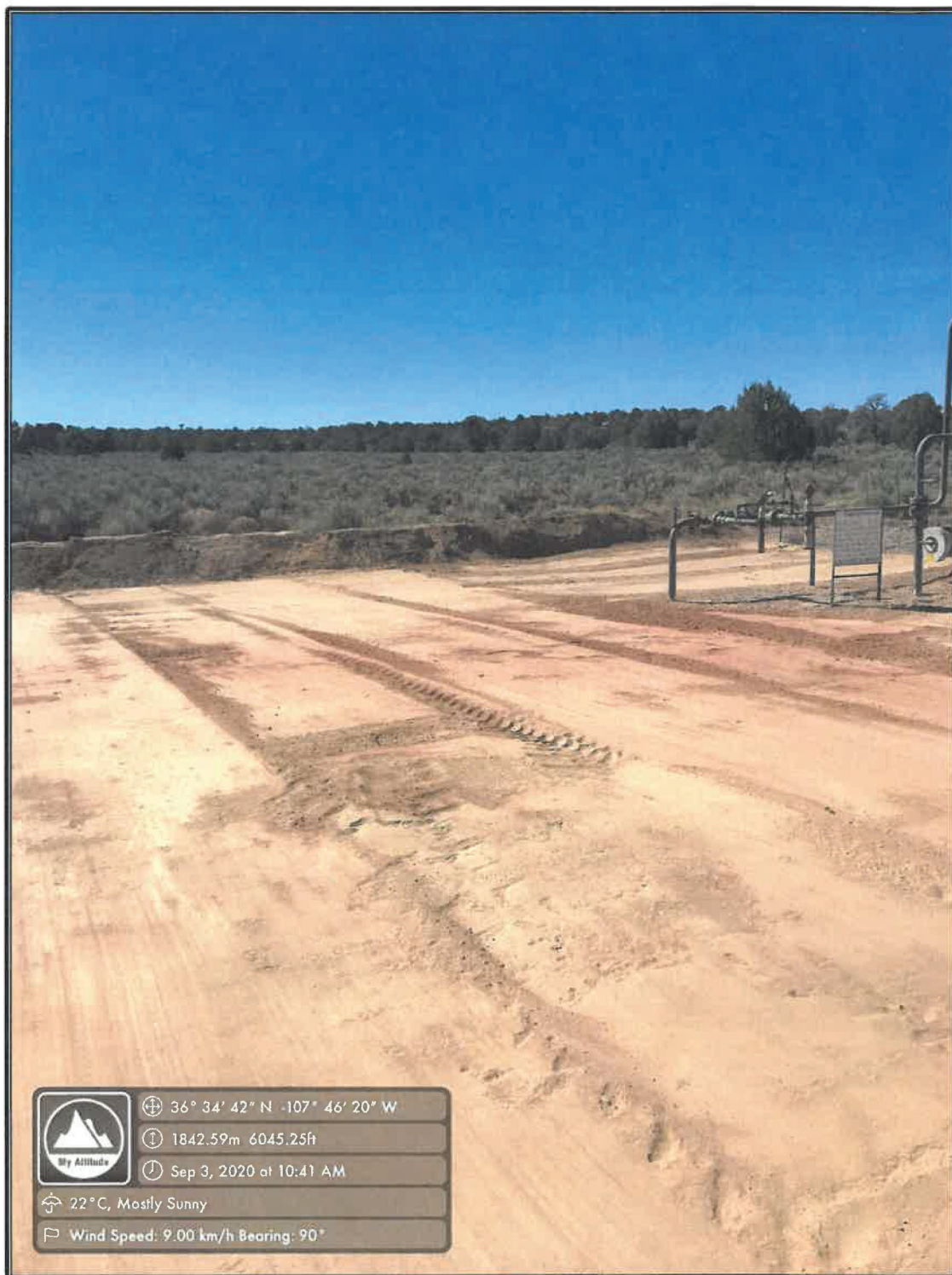


PHOTO 5: BGT Area after Backfill



Analytical Report

Report Summary

Client: Enduring Resources, LLC

Samples Received: 7/29/2020

Job Number: 17065-0017

Work Order: P007079

Project Name/Location: Marshall A3

Report Reviewed By:

A handwritten signature in black ink, appearing to read 'Walter Hinchman', is written over a horizontal line.

Date: 7/31/20

Walter Hinchman, Laboratory Director



Envirotech Inc. certifies the test results meet all requirements of TNI unless footnoted otherwise.
Statement of Data Authenticity: Envirotech, Inc. attests the data reported has not been altered in any way.
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Envirotech, Inc. holds the Utah TNI certification NM009792018-1 for the data reported.
Envirotech, Inc. holds the Texas TNI certification T104704557-19-2 for the data reported.





Enduring Resources, LLC
511 16th Street, Suite 700
Denver CO, 80202

Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
07/31/20 10:36

Sample Summary

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
BGT Composite	P007079-01A	Soil	07/29/20	07/29/20	Glass Jar, 4 oz.

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Envirotech, Inc | 5796 U.S Highway 64 | Farmington, NM 87401 | 505.632.1881 | Envirotech-inc.com





Enduring Resources, LLC
511 16th Street, Suite 700
Denver CO, 80202

Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
07/31/20 10:36

**BGT Composite
P007079-01 (Solid)**

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B		mg/kg	mg/kg			Batch: 2031011
Benzene	ND	0.0250	1	07/29/20	07/29/20	
Toluene	ND	0.0250	1	07/29/20	07/29/20	
Ethylbenzene	ND	0.0250	1	07/29/20	07/29/20	
p,m-Xylene	ND	0.0500	1	07/29/20	07/29/20	
o-Xylene	ND	0.0250	1	07/29/20	07/29/20	
Total Xylenes	ND	0.0250	1	07/29/20	07/29/20	
Surrogate: 4-Bromochlorobenzene-PID	103 %	50-150		07/29/20	07/29/20	
Nonhalogenated Organics by EPA 8015D - GRO		mg/kg	mg/kg			Batch: 2031011
Gasoline Range Organics (C6-C10)	ND	20.0	1	07/29/20	07/29/20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	91.9 %	50-150		07/29/20	07/29/20	
Nonhalogenated Organics by EPA 8015D - DRO/ORO		mg/kg	mg/kg			Batch: 2031015
Diesel Range Organics (C10-C28)	433	25.0	1	07/29/20	07/29/20	
Oil Range Organics (C28-C40)	1100	50.0	1	07/29/20	07/29/20	
Surrogate: n-Nonane	98.9 %	50-200		07/29/20	07/29/20	
Anions by EPA 300.0/9056A		mg/kg	mg/kg			Batch: 2031012
Chloride	ND	20.0	1	07/29/20	07/29/20	

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Enduring Resources, LLC
511 16th Street, Suite 700
Denver CO, 80202

Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
07/31/20 10:36

Volatile Organics by EPA 8021B - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	

Blank (2031011-BLK1)

Prepared & Analyzed: 07/29/20 1

Benzene	ND	0.0250							
Toluene	ND	0.0250							
Ethylbenzene	ND	0.0250							
p,m-Xylene	ND	0.0500							
o-Xylene	ND	0.0250							
Total Xylenes	ND	0.0250							
Surrogate: 4-Bromochlorobenzene-PID	8.16		8.00		102	50-150			

LCS (2031011-BS1)

Prepared & Analyzed: 07/29/20 1

Benzene	5.16	0.0250	5.00		103	70-130			
Toluene	5.18	0.0250	5.00		104	70-130			
Ethylbenzene	5.15	0.0250	5.00		103	70-130			
p,m-Xylene	10.3	0.0500	10.0		103	70-130			
o-Xylene	5.17	0.0250	5.00		103	70-130			
Total Xylenes	15.5	0.0250	15.0		103	0-200			
Surrogate: 4-Bromochlorobenzene-PID	8.54		8.00		107	50-150			

Matrix Spike (2031011-MS1)

Source: P007075-01

Prepared & Analyzed: 07/29/20 1

Benzene	4.95	0.0250	5.00	ND	99.0	54.3-133			
Toluene	4.95	0.0250	5.00	ND	99.0	61.4-130			
Ethylbenzene	4.93	0.0250	5.00	ND	98.6	61.4-133			
p,m-Xylene	9.87	0.0500	10.0	ND	98.7	63.3-131			
o-Xylene	4.93	0.0250	5.00	ND	98.6	63.3-131			
Total Xylenes	14.8	0.0250	15.0	ND	98.7	0-200			
Surrogate: 4-Bromochlorobenzene-PID	8.17		8.00		102	50-150			

Matrix Spike Dup (2031011-MSD1)

Source: P007075-01

Prepared & Analyzed: 07/29/20 1

Benzene	5.24	0.0250	5.00	ND	105	54.3-133	5.71	20	
Toluene	5.22	0.0250	5.00	ND	104	61.4-130	5.30	20	
Ethylbenzene	5.19	0.0250	5.00	ND	104	61.4-133	5.17	20	
p,m-Xylene	10.4	0.0500	10.0	ND	104	63.3-131	5.12	20	
o-Xylene	5.20	0.0250	5.00	ND	104	63.3-131	5.28	20	
Total Xylenes	15.6	0.0250	15.0	ND	104	0-200	5.17	200	
Surrogate: 4-Bromochlorobenzene-PID	8.20		8.00		102	50-150			

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Enduring Resources, LLC
511 16th Street, Suite 700
Denver CO, 80202

Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
07/31/20 10:36

Nonhalogenated Organics by EPA 8015D - GRO - Quality Control

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	REC %	REC Limits %	RPD %	RPD Limit %	Notes
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Blank (2031011-BLK1)

Prepared & Analyzed: 07/29/20 1

Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.51		8.00		93.9	50-150			

LCS (2031011-BS2)

Prepared & Analyzed: 07/29/20 1

Gasoline Range Organics (C6-C10)	47.5	20.0	50.0		95.0	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.42		8.00		92.7	50-150			

Matrix Spike (2031011-MS2)

Source: P007075-01

Prepared & Analyzed: 07/29/20 1

Gasoline Range Organics (C6-C10)	50.7	20.0	50.0	ND	101	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.58		8.00		94.8	50-150			

Matrix Spike Dup (2031011-MSD2)

Source: P007075-01

Prepared & Analyzed: 07/29/20 1

Gasoline Range Organics (C6-C10)	48.8	20.0	50.0	ND	97.6	70-130	3.83	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.51		8.00		93.9	50-150			

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Enduring Resources, LLC	Project Name:	Marshall A3	Reported: 07/31/20 10:36
511 16th Street, Suite 700	Project Number:	17065-0017	
Denver CO, 80202	Project Manager:	James McDaniel	

Nonhalogenated Organics by EPA 8015D - DRO/ORO - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	

Blank (2031015-BLK1)

Prepared & Analyzed: 07/29/20 1

Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C40)	ND	50.0							
Surrogate: n-Nonane	52.4		50.0		105	50-200			

LCS (2031015-BS1)

Prepared: 07/29/20 1 Analyzed: 07/29/20 2

Diesel Range Organics (C10-C28)	470	25.0	500		94.1	38-132			
Surrogate: n-Nonane	52.6		50.0		105	50-200			

Matrix Spike (2031015-MS1)

Source: P007079-01 Prepared: 07/29/20 1 Analyzed: 07/29/20 2

Diesel Range Organics (C10-C28)	947	25.0	500	433	103	38-132			
Surrogate: n-Nonane	48.8		50.0		97.6	50-200			

Matrix Spike Dup (2031015-MSD1)

Source: P007079-01 Prepared: 07/29/20 1 Analyzed: 07/29/20 2

Diesel Range Organics (C10-C28)	984	25.0	500	433	110	38-132	3.83	20	
Surrogate: n-Nonane	48.8		50.0		97.5	50-200			

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Enduring Resources, LLC	Project Name:	Marshall A3	
511 16th Street, Suite 700	Project Number:	17065-0017	Reported:
Denver CO, 80202	Project Manager:	James McDaniel	07/31/20 10:36

Anions by EPA 300.0/9056A - Quality Control

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	REC %	REC Limits %	RPD %	RPD Limit %	Notes
Blank (2031012-BLK1)					Prepared & Analyzed: 07/29/20 1				
Chloride	ND	20.0							
LCS (2031012-BS1)					Prepared & Analyzed: 07/29/20 1				
Chloride	252	20.0	250		101	90-110			
Matrix Spike (2031012-MS1)					Source: P007075-01 Prepared & Analyzed: 07/29/20 1				
Chloride	353	20.0	250	97.6	102	80-120			
Matrix Spike Dup (2031012-MSD1)					Source: P007075-01 Prepared & Analyzed: 07/29/20 1				
Chloride	353	20.0	250	97.6	102	80-120	0.00283	20	

QC Summary Report Comment:

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

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Enduring Resources, LLC
511 16th Street, Suite 700
Denver CO, 80202

Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
07/31/20 10:36

Notes and Definitions

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

RPD Relative Percent Difference

** Methods marked with ** are non-accredited methods.

Soil data is reported on an "as received" weight basis, unless reported otherwise.

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Project Information

Chain of Custody

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Analytical Report

Report Summary

Client: Enduring Resources, LLC

Samples Received: 8/3/2020

Job Number: 17065-0017

Work Order: P008005

Project Name/Location: Marshall A3

Report Reviewed By:

A handwritten signature in black ink, appearing to read 'Walter Hinchman', is written over a horizontal line.

Date: 8/10/20

Walter Hinchman, Laboratory Director



Envirotech Inc. certifies the test results meet all requirements of TNI unless footnoted otherwise.
Statement of Data Authenticity: Envirotech, Inc. attests the data reported has not been altered in any way.
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Envirotech, Inc. holds the Utah TNI certification NM009792018-1 for the data reported.
Envirotech, Inc. holds the Texas TNI certification T104704557-19-2 for the data reported.





Enduring Resources, LLC
511 16th Street, Suite 700
Denver CO, 80202

Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
08/10/20 10:34

Sample Summary

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
Wall Composite	P008005-01A	Soil	08/03/20	08/03/20	Glass Jar, 4 oz.
Bottom Composite	P008005-02A	Soil	08/03/20	08/03/20	Glass Jar, 4 oz.

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Enduring Resources, LLC
511 16th Street, Suite 700
Denver CO, 80202

Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
08/10/20 10:34

**Wall Composite
P008005-01 (Solid)**

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B		mg/kg	mg/kg			Batch: 2032018
Benzene	ND	0.0250	1	08/05/20	08/05/20	
Toluene	ND	0.0250	1	08/05/20	08/05/20	
Ethylbenzene	ND	0.0250	1	08/05/20	08/05/20	
p,m-Xylene	ND	0.0500	1	08/05/20	08/05/20	
o-Xylene	ND	0.0250	1	08/05/20	08/05/20	
Total Xylenes	ND	0.0250	1	08/05/20	08/05/20	
Surrogate: 4-Bromochlorobenzene-PID		100 %	50-150	08/05/20	08/05/20	
Nonhalogenated Organics by EPA 8015D - GRO		mg/kg	mg/kg			Batch: 2032018
Gasoline Range Organics (C6-C10)	ND	20.0	1	08/05/20	08/05/20	
Surrogate: 1-Chloro-4-fluorobenzene-FID		88.8 %	50-150	08/05/20	08/05/20	
Nonhalogenated Organics by EPA 8015D - DRO/ORO		mg/kg	mg/kg			Batch: 2032016
Diesel Range Organics (C10-C28)	476	25.0	1	08/05/20	08/05/20	
Oil Range Organics (C28-C40)	1150	50.0	1	08/05/20	08/05/20	
Surrogate: n-Nonane		99.5 %	50-200	08/05/20	08/05/20	
Anions by EPA 300.0/9056A		mg/kg	mg/kg			Batch: 2032017
Chloride	ND	20.0	1	08/05/20	08/05/20	

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Enduring Resources, LLC
511 16th Street, Suite 700
Denver CO, 80202

Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
08/10/20 10:34

Bottom Composite
P008005-02 (Solid)

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg				Batch: 2032018
Benzene	ND	0.0250	1	08/05/20	08/05/20	
Toluene	ND	0.0250	1	08/05/20	08/05/20	
Ethylbenzene	ND	0.0250	1	08/05/20	08/05/20	
p,m-Xylene	ND	0.0500	1	08/05/20	08/05/20	
o-Xylene	ND	0.0250	1	08/05/20	08/05/20	
Total Xylenes	ND	0.0250	1	08/05/20	08/05/20	
Surrogate: 4-Bromochlorobenzene-PID	96.5 %	50-150		08/05/20	08/05/20	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg				Batch: 2032018
Gasoline Range Organics (C6-C10)	ND	20.0	1	08/05/20	08/05/20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	92.7 %	50-150		08/05/20	08/05/20	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg				Batch: 2032016
Diesel Range Organics (C10-C28)	38.0	25.0	1	08/05/20	08/05/20	
Oil Range Organics (C28-C40)	89.1	50.0	1	08/05/20	08/05/20	
Surrogate: n-Nonane	91.3 %	50-200		08/05/20	08/05/20	
Anions by EPA 300.0/9056A	mg/kg	mg/kg				Batch: 2032017
Chloride	ND	20.0	1	08/05/20	08/05/20	

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Enduring Resources, LLC
511 16th Street, Suite 700
Denver CO, 80202

Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
08/10/20 10:34

Volatile Organics by EPA 8021B - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	

Blank (2032018-BLK1)

Prepared: 08/05/20 0 Analyzed: 08/05/20 1

Benzene	ND	0.0250							
Toluene	ND	0.0250							
Ethylbenzene	ND	0.0250							
p,m-Xylene	ND	0.0500							
o-Xylene	ND	0.0250							
Total Xylenes	ND	0.0250							
Surrogate: 4-Bromochlorobenzene-PID	8.12		8.00		102	50-150			

LCS (2032018-BS1)

Prepared: 08/05/20 0 Analyzed: 08/05/20 1

Benzene	5.42	0.0250	5.00		108	70-130			
Toluene	5.43	0.0250	5.00		109	70-130			
Ethylbenzene	5.40	0.0250	5.00		108	70-130			
p,m-Xylene	10.8	0.0500	10.0		108	70-130			
o-Xylene	5.43	0.0250	5.00		109	70-130			
Total Xylenes	16.2	0.0250	15.0		108	0-200			
Surrogate: 4-Bromochlorobenzene-PID	8.41		8.00		105	50-150			

Matrix Spike (2032018-MS1)

Source: P008005-01

Prepared: 08/05/20 0 Analyzed: 08/05/20 1

Benzene	5.36	0.0250	5.00	ND	107	54.3-133			
Toluene	5.37	0.0250	5.00	ND	107	61.4-130			
Ethylbenzene	5.34	0.0250	5.00	ND	107	61.4-133			
p,m-Xylene	10.7	0.0500	10.0	ND	107	63.3-131			
o-Xylene	5.37	0.0250	5.00	ND	107	63.3-131			
Total Xylenes	16.1	0.0250	15.0	ND	107	0-200			
Surrogate: 4-Bromochlorobenzene-PID	8.33		8.00		104	50-150			

Matrix Spike Dup (2032018-MSD1)

Source: P008005-01

Prepared: 08/05/20 0 Analyzed: 08/05/20 1

Benzene	5.22	0.0250	5.00	ND	104	54.3-133	2.71	20	
Toluene	5.20	0.0250	5.00	ND	104	61.4-130	3.17	20	
Ethylbenzene	5.17	0.0250	5.00	ND	103	61.4-133	3.38	20	
p,m-Xylene	10.3	0.0500	10.0	ND	103	63.3-131	3.44	20	
o-Xylene	5.19	0.0250	5.00	ND	104	63.3-131	3.37	20	
Total Xylenes	15.5	0.0250	15.0	ND	104	0-200	3.41	200	
Surrogate: 4-Bromochlorobenzene-PID	8.10		8.00		101	50-150			

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Enduring Resources, LLC	Project Name:	Marshall A3	
511 16th Street, Suite 700	Project Number:	17065-0017	Reported:
Denver CO, 80202	Project Manager:	James McDaniel	08/10/20 10:34

Nonhalogenated Organics by EPA 8015D - GRO - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	

Blank (2032018-BLK1)

Prepared: 08/05/20 0 Analyzed: 08/05/20 1

Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.16		8.00		89.5	50-150			

LCS (2032018-BS2)

Prepared: 08/05/20 0 Analyzed: 08/05/20 1

Gasoline Range Organics (C6-C10)	45.6	20.0	50.0		91.2	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.29		8.00		91.1	50-150			

Matrix Spike (2032018-MS2)

Source: P008005-01 Prepared: 08/05/20 0 Analyzed: 08/05/20 1

Gasoline Range Organics (C6-C10)	43.9	20.0	50.0	ND	87.8	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.36		8.00		91.9	50-150			

Matrix Spike Dup (2032018-MSD2)

Source: P008005-01 Prepared: 08/05/20 0 Analyzed: 08/05/20 1

Gasoline Range Organics (C6-C10)	44.8	20.0	50.0	ND	89.6	70-130	2.06	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.22		8.00		90.2	50-150			

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Enduring Resources, LLC	Project Name:	Marshall A3	
511 16th Street, Suite 700	Project Number:	17065-0017	Reported:
Denver CO, 80202	Project Manager:	James McDaniel	08/10/20 10:34

Nonhalogenated Organics by EPA 8015D - DRO/ORO - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	

Blank (2032016-BLK1)

Prepared: 08/05/20 0 Analyzed: 08/05/20 1

Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C40)	ND	50.0							
Surrogate: n-Nonane	45.7		50.0		91.3	50-200			

LCS (2032016-BS1)

Prepared: 08/05/20 0 Analyzed: 08/05/20 1

Diesel Range Organics (C10-C28)	439	25.0	500		87.9	38-132			
Surrogate: n-Nonane	47.3		50.0		94.6	50-200			

Matrix Spike (2032016-MS1)

Source: P007096-01

Prepared: 08/05/20 0 Analyzed: 08/05/20 1

Diesel Range Organics (C10-C28)	2130	125	500	1430	141	38-132			M2
Surrogate: n-Nonane	68.2		50.0		136	50-200			

Matrix Spike Dup (2032016-MSD1)

Source: P007096-01

Prepared: 08/05/20 0 Analyzed: 08/05/20 1

Diesel Range Organics (C10-C28)	2030	125	500	1430	120	38-132	5.02	20	
Surrogate: n-Nonane	63.9		50.0		128	50-200			

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Enduring Resources, LLC
511 16th Street, Suite 700
Denver CO, 80202

Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
08/10/20 10:34

Anions by EPA 300.0/9056A - Quality Control

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	REC %	REC Limits %	RPD %	RPD Limit %	Notes
Blank (2032017-BLK1)					Prepared: 08/05/20 0 Analyzed: 08/05/20 1				
Chloride	ND	20.0							
LCS (2032017-BS1)					Prepared: 08/05/20 0 Analyzed: 08/05/20 1				
Chloride	271	20.0	250		108	90-110			
Matrix Spike (2032017-MS1)					Source: P008005-01 Prepared: 08/05/20 0 Analyzed: 08/05/20 1				
Chloride	257	20.0	250	ND	103	80-120			
Matrix Spike Dup (2032017-MSD1)					Source: P008005-01 Prepared: 08/05/20 0 Analyzed: 08/05/20 1				
Chloride	250	20.0	250	ND	100	80-120	2.73	20	

QC Summary Report Comment:

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

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Enduring Resources, LLC
511 16th Street, Suite 700
Denver CO, 80202

Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
08/10/20 10:34

Notes and Definitions

M2 Matrix spike recovery was outside quality control limits. The associated LCS spike recovery was acceptable.

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

RPD Relative Percent Difference

** Methods marked with ** are non-accredited methods.

Soil data is reported on an "as received" weight basis, unless reported otherwise.

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Project Information

Chain of Custody

Page 1 of 1

[illegible]

Page 10 of 10



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24 Hour Emergency Response Phone: (505) 382-1879

Ph (505) 532-1881 Fx (505) 532-1885

envelope@envelope.com
latadmin@envelope.com



Analytical Report

Report Summary

Client: Enduring Resources, LLC

Samples Received: 8/13/2020

Job Number: 17065-0017

Work Order: P008036

Project Name/Location: Marshall A3

Report Reviewed By:

A handwritten signature in black ink, appearing to read 'Walter Hinchman', is written over a horizontal line.

Date: 8/20/20

Walter Hinchman, Laboratory Director



Envirotech Inc. certifies the test results meet all requirements of TNI unless footnoted otherwise.
Statement of Data Authenticity: Envirotech, Inc. attests the data reported has not been altered in any way.
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Envirotech, Inc. holds the Utah TNI certification NM009792018-1 for the data reported.
Envirotech, Inc. holds the Texas TNI certification T104704557-19-2 for the data reported.





Enduring Resources, LLC
511 16th Street, Suite 700
Denver CO, 80202

Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
08/20/20 14:16

Sample Summary

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
South Wall	P008036-01A	Soil	08/13/20	08/13/20	Glass Jar, 4 oz.
East Wall	P008036-02A	Soil	08/13/20	08/13/20	Glass Jar, 4 oz.
West Wall	P008036-03A	Soil	08/13/20	08/13/20	Glass Jar, 4 oz.
North Wall	P008036-04A	Soil	08/13/20	08/13/20	Glass Jar, 4 oz.
Bottom @ 5'	P008036-05A	Soil	08/13/20	08/13/20	Glass Jar, 4 oz.

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511 16th Street, Suite 700
Denver CO, 80202

Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
08/20/20 14:16

South Wall
P008036-01 (Solid)

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B		mg/kg	mg/kg			Batch: 2033033
Benzene	ND	0.0250	1	08/14/20	08/14/20	
Toluene	ND	0.0250	1	08/14/20	08/14/20	
Ethylbenzene	ND	0.0250	1	08/14/20	08/14/20	
p,m-Xylene	ND	0.0500	1	08/14/20	08/14/20	
o-Xylene	ND	0.0250	1	08/14/20	08/14/20	
Total Xylenes	ND	0.0250	1	08/14/20	08/14/20	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>		101 %	50-150	08/14/20	08/14/20	
Nonhalogenated Organics by EPA 8015D - GRO		mg/kg	mg/kg			Batch: 2033033
Gasoline Range Organics (C6-C10)	ND	20.0	1	08/14/20	08/14/20	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>		92.9 %	50-150	08/14/20	08/14/20	
Nonhalogenated Organics by EPA 8015D - DRO/ORO		mg/kg	mg/kg			Batch: 2033038
Diesel Range Organics (C10-C28)	391	25.0	1	08/14/20	08/14/20	
Oil Range Organics (C28-C40)	977	50.0	1	08/14/20	08/14/20	
<i>Surrogate: n-Nonane</i>		103 %	50-200	08/14/20	08/14/20	
Anions by EPA 300.0/9056A		mg/kg	mg/kg			Batch: 2034004
Chloride	ND	20.0	1	08/17/20	08/17/20	

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Denver CO, 80202

Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
08/20/20 14:16

East Wall
P008036-02 (Solid)

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B		mg/kg	mg/kg			Batch: 2033033
Benzene	ND	0.0250	1	08/14/20	08/14/20	
Toluene	ND	0.0250	1	08/14/20	08/14/20	
Ethylbenzene	ND	0.0250	1	08/14/20	08/14/20	
p,m-Xylene	ND	0.0500	1	08/14/20	08/14/20	
o-Xylene	ND	0.0250	1	08/14/20	08/14/20	
Total Xylenes	ND	0.0250	1	08/14/20	08/14/20	
Surrogate: 4-Bromochlorobenzene-PID	100 %	50-150		08/14/20	08/14/20	
Nonhalogenated Organics by EPA 8015D - GRO		mg/kg	mg/kg			Batch: 2033033
Gasoline Range Organics (C6-C10)	ND	20.0	1	08/14/20	08/14/20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	92.5 %	50-150		08/14/20	08/14/20	
Nonhalogenated Organics by EPA 8015D - DRO/ORO		mg/kg	mg/kg			Batch: 2033038
Diesel Range Organics (C10-C28)	ND	25.0	1	08/14/20	08/18/20	
Oil Range Organics (C28-C40)	ND	50.0	1	08/14/20	08/18/20	
Surrogate: n-Nonane	97.6 %	50-200		08/14/20	08/18/20	
Anions by EPA 300.0/9056A		mg/kg	mg/kg			Batch: 2034004
Chloride	ND	20.0	1	08/17/20	08/17/20	

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Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
08/20/20 14:16

West Wall
P008036-03 (Solid)

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B		mg/kg	mg/kg			Batch: 2033033
Benzene	ND	0.0250	1	08/14/20	08/14/20	
Toluene	ND	0.0250	1	08/14/20	08/14/20	
Ethylbenzene	ND	0.0250	1	08/14/20	08/14/20	
p,m-Xylene	ND	0.0500	1	08/14/20	08/14/20	
o-Xylene	ND	0.0250	1	08/14/20	08/14/20	
Total Xylenes	ND	0.0250	1	08/14/20	08/14/20	
Surrogate: 4-Bromochlorobenzene-PID		102 %	50-150	08/14/20	08/14/20	
Nonhalogenated Organics by EPA 8015D - GRO		mg/kg	mg/kg			Batch: 2033033
Gasoline Range Organics (C6-C10)	ND	20.0	1	08/14/20	08/14/20	
Surrogate: 1-Chloro-4-fluorobenzene-FID		92.5 %	50-150	08/14/20	08/14/20	
Nonhalogenated Organics by EPA 8015D - DRO/ORO		mg/kg	mg/kg			Batch: 2033038
Diesel Range Organics (C10-C28)	ND	25.0	1	08/14/20	08/14/20	
Oil Range Organics (C28-C40)	ND	50.0	1	08/14/20	08/14/20	
Surrogate: n-Nonane		98.5 %	50-200	08/14/20	08/14/20	
Anions by EPA 300.0/9056A		mg/kg	mg/kg			Batch: 2034004
Chloride	ND	20.0	1	08/17/20	08/17/20	

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511 16th Street, Suite 700
Denver CO, 80202

Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
08/20/20 14:16

North Wall
P008036-04 (Solid)

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg				Batch: 2033033
Benzene	ND	0.0250	1	08/14/20	08/14/20	
Toluene	ND	0.0250	1	08/14/20	08/14/20	
Ethylbenzene	ND	0.0250	1	08/14/20	08/14/20	
p,m-Xylene	ND	0.0500	1	08/14/20	08/14/20	
o-Xylene	ND	0.0250	1	08/14/20	08/14/20	
Total Xylenes	ND	0.0250	1	08/14/20	08/14/20	
Surrogate: 4-Bromochlorobenzene-PID	103 %	50-150		08/14/20	08/14/20	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg				Batch: 2033033
Gasoline Range Organics (C6-C10)	ND	20.0	1	08/14/20	08/14/20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	90.6 %	50-150		08/14/20	08/14/20	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg				Batch: 2033038
Diesel Range Organics (C10-C28)	ND	25.0	1	08/14/20	08/14/20	
Oil Range Organics (C28-C40)	ND	50.0	1	08/14/20	08/14/20	
Surrogate: n-Nonane	103 %	50-200		08/14/20	08/14/20	
Anions by EPA 300.0/9056A	mg/kg	mg/kg				Batch: 2034004
Chloride	ND	20.0	1	08/17/20	08/17/20	

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511 16th Street, Suite 700
Denver CO, 80202

Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
08/20/20 14:16

Bottom @ 5'
P008036-05 (Solid)

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg				Batch: 2033033
Benzene	ND	0.0250	1	08/14/20	08/14/20	
Toluene	ND	0.0250	1	08/14/20	08/14/20	
Ethylbenzene	ND	0.0250	1	08/14/20	08/14/20	
p,m-Xylene	ND	0.0500	1	08/14/20	08/14/20	
o-Xylene	ND	0.0250	1	08/14/20	08/14/20	
Total Xylenes	ND	0.0250	1	08/14/20	08/14/20	
Surrogate: 4-Bromochlorobenzene-PID		100 %	50-150	08/14/20	08/14/20	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg				Batch: 2033033
Gasoline Range Organics (C6-C10)	ND	20.0	1	08/14/20	08/14/20	
Surrogate: 1-Chloro-4-fluorobenzene-FID		95.5 %	50-150	08/14/20	08/14/20	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg				Batch: 2033038
Diesel Range Organics (C10-C28)	32.0	25.0	1	08/14/20	08/14/20	
Oil Range Organics (C28-C40)	78.4	50.0	1	08/14/20	08/14/20	
Surrogate: n-Nonane		103 %	50-200	08/14/20	08/14/20	
Anions by EPA 300.0/9056A	mg/kg	mg/kg				Batch: 2034004
Chloride	ND	20.0	1	08/17/20	08/17/20	

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Enduring Resources, LLC
511 16th Street, Suite 700
Denver CO, 80202

Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
08/20/20 14:16

Volatile Organics by EPA 8021B - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	

Blank (2033033-BLK1)

Prepared: 08/14/20 0 Analyzed: 08/14/20 1

Benzene	ND	0.0250							
Toluene	ND	0.0250							
Ethylbenzene	ND	0.0250							
p,m-Xylene	ND	0.0500							
o-Xylene	ND	0.0250							
Total Xylenes	ND	0.0250							
Surrogate: 4-Bromochlorobenzene-PID	8.30		8.00		104	50-150			

LCS (2033033-BS1)

Prepared: 08/14/20 0 Analyzed: 08/14/20 1

Benzene	5.33	0.0250	5.00		107	70-130			
Toluene	5.40	0.0250	5.00		108	70-130			
Ethylbenzene	5.40	0.0250	5.00		108	70-130			
p,m-Xylene	10.8	0.0500	10.0		108	70-130			
o-Xylene	5.43	0.0250	5.00		109	70-130			
Total Xylenes	16.2	0.0250	15.0		108	70-130			
Surrogate: 4-Bromochlorobenzene-PID	8.39		8.00		105	50-150			

Matrix Spike (2033033-MS1)

Source: P008036-01 Prepared: 08/14/20 0 Analyzed: 08/14/20 1

Benzene	5.21	0.0250	5.00	ND	104	54-133			
Toluene	5.29	0.0250	5.00	ND	106	61-130			
Ethylbenzene	5.29	0.0250	5.00	ND	106	61-133			
p,m-Xylene	10.6	0.0500	10.0	ND	106	63-131			
o-Xylene	5.32	0.0250	5.00	ND	106	63-131			
Total Xylenes	15.9	0.0250	15.0	ND	106	63-131			
Surrogate: 4-Bromochlorobenzene-PID	8.31		8.00		104	50-150			

Matrix Spike Dup (2033033-MSD1)

Source: P008036-01 Prepared: 08/14/20 0 Analyzed: 08/14/20 1

Benzene	5.37	0.0250	5.00	ND	107	54-133	3.12	20	
Toluene	5.43	0.0250	5.00	ND	109	61-130	2.52	20	
Ethylbenzene	5.42	0.0250	5.00	ND	108	61-133	2.35	20	
p,m-Xylene	10.8	0.0500	10.0	ND	108	63-131	2.24	20	
o-Xylene	5.45	0.0250	5.00	ND	109	63-131	2.55	20	
Total Xylenes	16.3	0.0250	15.0	ND	109	63-131	2.35	20	
Surrogate: 4-Bromochlorobenzene-PID	8.29		8.00		104	50-150			

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Enduring Resources, LLC
511 16th Street, Suite 700
Denver CO, 80202

Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
08/20/20 14:16

Nonhalogenated Organics by EPA 8015D - GRO - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	

Blank (2033033-BLK1)

Prepared: 08/14/20 0 Analyzed: 08/14/20 1

Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.37		8.00		92.1	50-150			

LCS (2033033-BS2)

Prepared: 08/14/20 0 Analyzed: 08/14/20 1

Gasoline Range Organics (C6-C10)	48.6	20.0	50.0		97.1	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.35		8.00		91.9	50-150			

Matrix Spike (2033033-MS2)

Source: P008036-01 Prepared: 08/14/20 0 Analyzed: 08/14/20 1

Gasoline Range Organics (C6-C10)	48.8	20.0	50.0	ND	97.7	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.47		8.00		93.3	50-150			

Matrix Spike Dup (2033033-MSD2)

Source: P008036-01 Prepared: 08/14/20 0 Analyzed: 08/14/20 1

Gasoline Range Organics (C6-C10)	49.0	20.0	50.0	ND	97.9	70-130	0.271	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.35		8.00		91.9	50-150			

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Enduring Resources, LLC	Project Name:	Marshall A3	
511 16th Street, Suite 700	Project Number:	17065-0017	Reported:
Denver CO, 80202	Project Manager:	James McDaniel	08/20/20 14:16

Nonhalogenated Organics by EPA 8015D - DRO/ORO - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	

Blank (2033038-BLK1)

Prepared: 08/14/20 0 Analyzed: 08/14/20 1

Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C40)	ND	50.0							
Surrogate: n-Nonane	59.6		50.0		119	50-200			

LCS (2033038-BS1)

Prepared: 08/14/20 0 Analyzed: 08/14/20 1

Diesel Range Organics (C10-C28)	491	25.0	500		98.2	38-132			
Surrogate: n-Nonane	56.0		50.0		112	50-200			

Matrix Spike (2033038-MS1)

Source: P008036-01 Prepared: 08/14/20 0 Analyzed: 08/14/20 2

Diesel Range Organics (C10-C28)	849	25.0	500	391	91.5	38-132			
Surrogate: n-Nonane	50.4		50.0		101	50-200			

Matrix Spike Dup (2033038-MSD1)

Source: P008036-01 Prepared: 08/14/20 0 Analyzed: 08/14/20 2

Diesel Range Organics (C10-C28)	1100	25.0	500	391	141	38-132	25.6	20	M2, R2
Surrogate: n-Nonane	51.4		50.0		103	50-200			

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Enduring Resources, LLC	Project Name:	Marshall A3	
511 16th Street, Suite 700	Project Number:	17065-0017	Reported:
Denver CO, 80202	Project Manager:	James McDaniel	08/20/20 14:16

Anions by EPA 300.0/9056A - Quality Control

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	REC %	REC Limits %	RPD %	RPD Limit %	Notes
Blank (2034004-BLK1)					Prepared & Analyzed: 08/17/20 1				
Chloride	ND	20.0							
LCS (2034004-BS1)					Prepared & Analyzed: 08/17/20 1				
Chloride	247	20.0	250		98.8	90-110			
Matrix Spike (2034004-MS1)					Source: P008036-01 Prepared & Analyzed: 08/17/20 1				
Chloride	249	20.0	250	ND	99.5	80-120			
Matrix Spike Dup (2034004-MSD1)					Source: P008036-01 Prepared & Analyzed: 08/17/20 1				
Chloride	249	20.0	250	ND	99.4	80-120	0.0121	20	

QC Summary Report Comment:

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

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Enduring Resources, LLC	Project Name:	Marshall A3	
511 16th Street, Suite 700	Project Number:	17065-0017	Reported:
Denver CO, 80202	Project Manager:	James McDaniel	08/20/20 14:16

Notes and Definitions

- R2 The RPD exceeded the acceptance limit.
- M2 Matrix spike recovery was outside quality control limits. The associated LCS spike recovery was acceptable.
- ND Analyte NOT DETECTED at or above the reporting limit
- NR Not Reported
- RPD Relative Percent Difference
- ** Methods marked with ** are non-accredited methods.

Soil data is reported on an "as received" weight basis, unless reported otherwise.

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Project Information

Chain of Custody

Page 1 of 1

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Page 13 of 13



Analytical Report

Report Summary

Client: Enduring Resources, LLC

Samples Received: 8/25/2020

Job Number: 17065-0017

Work Order: P008084

Project Name/Location: Marshall A3

Report Reviewed By:

A handwritten signature in black ink, appearing to read 'Walter Hinchman', is written over a horizontal line.

Date: 8/27/20

Walter Hinchman, Laboratory Director



Envirotech Inc. certifies the test results meet all requirements of TNI unless footnoted otherwise.
Statement of Data Authenticity: Envirotech, Inc. attests the data reported has not been altered in any way.
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Envirotech, Inc. holds the Texas TNI certification T104704557-19-2 for the data reported.





Enduring Resources, LLC
511 16th Street, Suite 700
Denver CO, 80202

Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
08/27/20 12:27

Sample Summary

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
Bottom 9'	P008084-01A	Soil	08/25/20	08/25/20	Glass Jar, 4 oz.
South Wall	P008084-02A	Soil	08/25/20	08/25/20	Glass Jar, 4 oz.

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Enduring Resources, LLC
511 16th Street, Suite 700
Denver CO, 80202

Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
08/27/20 12:27

Bottom 9'
P008084-01 (Solid)

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg				Batch: 2035018
Benzene	ND	0.0250	1	08/25/20	08/26/20	
Toluene	ND	0.0250	1	08/25/20	08/26/20	
Ethylbenzene	ND	0.0250	1	08/25/20	08/26/20	
p,m-Xylene	ND	0.0500	1	08/25/20	08/26/20	
o-Xylene	ND	0.0250	1	08/25/20	08/26/20	
Total Xylenes	ND	0.0250	1	08/25/20	08/26/20	
Surrogate: 4-Bromochlorobenzene-PID	98.8 %	50-150		08/25/20	08/26/20	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg				Batch: 2035018
Gasoline Range Organics (C6-C10)	ND	20.0	1	08/25/20	08/26/20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	89.2 %	50-150		08/25/20	08/26/20	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg				Batch: 2035016
Diesel Range Organics (C10-C28)	ND	25.0	1	08/25/20	08/25/20	
Oil Range Organics (C28-C40)	ND	50.0	1	08/25/20	08/25/20	
Surrogate: n-Nonane	95.6 %	50-200		08/25/20	08/25/20	
Anions by EPA 300.0/9056A	mg/kg	mg/kg				Batch: 2035017
Chloride	ND	20.0	1	08/25/20	08/26/20	

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Enduring Resources, LLC
511 16th Street, Suite 700
Denver CO, 80202

Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
08/27/20 12:27

South Wall
P008084-02 (Solid)

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B		mg/kg	mg/kg			Batch: 2035018
Benzene	ND	0.0250	1	08/25/20	08/26/20	
Toluene	ND	0.0250	1	08/25/20	08/26/20	
Ethylbenzene	ND	0.0250	1	08/25/20	08/26/20	
p,m-Xylene	ND	0.0500	1	08/25/20	08/26/20	
o-Xylene	ND	0.0250	1	08/25/20	08/26/20	
Total Xylenes	ND	0.0250	1	08/25/20	08/26/20	
Surrogate: 4-Bromochlorobenzene-PID	101 %	50-150		08/25/20	08/26/20	
Nonhalogenated Organics by EPA 8015D - GRO		mg/kg	mg/kg			Batch: 2035018
Gasoline Range Organics (C6-C10)	ND	20.0	1	08/25/20	08/26/20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	89.3 %	50-150		08/25/20	08/26/20	
Nonhalogenated Organics by EPA 8015D - DRO/ORO		mg/kg	mg/kg			Batch: 2035016
Diesel Range Organics (C10-C28)	ND	25.0	1	08/25/20	08/25/20	
Oil Range Organics (C28-C40)	ND	50.0	1	08/25/20	08/25/20	
Surrogate: n-Nonane	98.1 %	50-200		08/25/20	08/25/20	
Anions by EPA 300.0/9056A		mg/kg	mg/kg			Batch: 2035017
Chloride	ND	20.0	1	08/25/20	08/26/20	

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Enduring Resources, LLC
511 16th Street, Suite 700
Denver CO, 80202

Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
08/27/20 12:27

Volatile Organics by EPA 8021B - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	

Blank (2035018-BLK1)

Prepared: 08/25/20 1 Analyzed: 08/26/20 1

Benzene	ND	0.0250							
Toluene	ND	0.0250							
Ethylbenzene	ND	0.0250							
p,m-Xylene	ND	0.0500							
o-Xylene	ND	0.0250							
Total Xylenes	ND	0.0250							
Surrogate: 4-Bromochlorobenzene-PID	7.68		8.00		96.0	50-150			

LCS (2035018-BS1)

Prepared: 08/25/20 1 Analyzed: 08/26/20 1

Benzene	4.69	0.0250	5.00		93.8	70-130			
Toluene	4.69	0.0250	5.00		93.8	70-130			
Ethylbenzene	4.67	0.0250	5.00		93.3	70-130			
p,m-Xylene	9.36	0.0500	10.0		93.6	70-130			
o-Xylene	4.70	0.0250	5.00		94.1	70-130			
Total Xylenes	14.1	0.0250	15.0		93.8	70-130			
Surrogate: 4-Bromochlorobenzene-PID	7.98		8.00		99.7	50-150			

Matrix Spike (2035018-MS1)

Source: P008083-01 Prepared: 08/25/20 1 Analyzed: 08/26/20 2

Benzene	5.29	0.0250	5.00	ND	106	54-133			
Toluene	5.38	0.0250	5.00	0.135	105	61-130			
Ethylbenzene	6.09	0.0250	5.00	1.12	99.3	61-133			
p,m-Xylene	10.8	0.0500	10.0	0.969	98.0	63-131			
o-Xylene	5.52	0.0250	5.00	0.542	99.6	63-131			
Total Xylenes	16.3	0.0250	15.0	1.51	98.6	63-131			
Surrogate: 4-Bromochlorobenzene-PID	8.78		8.00		110	50-150			

Matrix Spike Dup (2035018-MSD1)

Source: P008083-01 Prepared: 08/25/20 1 Analyzed: 08/26/20 2

Benzene	4.90	0.0250	5.00	ND	97.9	54-133	7.70	20	
Toluene	4.97	0.0250	5.00	0.135	96.8	61-130	7.81	20	
Ethylbenzene	5.68	0.0250	5.00	1.12	91.1	61-133	6.91	20	
p,m-Xylene	9.95	0.0500	10.0	0.969	89.8	63-131	7.93	20	
o-Xylene	5.10	0.0250	5.00	0.542	91.2	63-131	7.89	20	
Total Xylenes	15.1	0.0250	15.0	1.51	90.3	63-131	7.92	20	
Surrogate: 4-Bromochlorobenzene-PID	8.68		8.00		109	50-150			

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Enduring Resources, LLC	Project Name:	Marshall A3	
511 16th Street, Suite 700	Project Number:	17065-0017	Reported:
Denver CO, 80202	Project Manager:	James McDaniel	08/27/20 12:27

Nonhalogenated Organics by EPA 8015D - GRO - Quality Control

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	REC %	REC Limits %	RPD %	RPD Limit %	Notes
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Blank (2035018-BLK1)

Prepared: 08/25/20 1 Analyzed: 08/26/20 1

Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.28		8.00		91.0	50-150			

LCS (2035018-BS2)

Prepared: 08/25/20 1 Analyzed: 08/26/20 1

Gasoline Range Organics (C6-C10)	43.6	20.0	50.0		87.1	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.21		8.00		90.1	50-150			

Matrix Spike (2035018-MS2)

Source: P008083-01

Prepared: 08/25/20 1 Analyzed: 08/26/20 2

Gasoline Range Organics (C6-C10)	90.5	20.0	50.0	46.6	87.9	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.56		8.00		94.4	50-150			

Matrix Spike Dup (2035018-MSD2)

Source: P008083-01

Prepared: 08/25/20 1 Analyzed: 08/26/20 2

Gasoline Range Organics (C6-C10)	81.8	20.0	50.0	46.6	70.5	70-130	10.1	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.45		8.00		93.1	50-150			

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Enduring Resources, LLC	Project Name:	Marshall A3	
511 16th Street, Suite 700	Project Number:	17065-0017	Reported:
Denver CO, 80202	Project Manager:	James McDaniel	08/27/20 12:27

Nonhalogenated Organics by EPA 8015D - DRO/ORO - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	

Blank (2035016-BLK1)

Prepared & Analyzed: 08/25/20 1

Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C40)	ND	50.0							
Surrogate: n-Nonane	52.9		50.0		106	50-200			

LCS (2035016-BS1)

Prepared & Analyzed: 08/25/20 1

Diesel Range Organics (C10-C28)	462	25.0	500		92.3	38-132			
Surrogate: n-Nonane	53.4		50.0		107	50-200			

Matrix Spike (2035016-MS1)

Source: P008075-01

Prepared & Analyzed: 08/25/20 1

Diesel Range Organics (C10-C28)	489	25.0	500	ND	97.9	38-132			
Surrogate: n-Nonane	48.6		50.0		97.1	50-200			

Matrix Spike Dup (2035016-MSD1)

Source: P008075-01

Prepared & Analyzed: 08/25/20 1

Diesel Range Organics (C10-C28)	476	25.0	500	ND	95.2	38-132	2.73	20	
Surrogate: n-Nonane	51.2		50.0		102	50-200			

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Enduring Resources, LLC
511 16th Street, Suite 700
Denver CO, 80202

Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
08/27/20 12:27

Anions by EPA 300.0/9056A - Quality Control

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	REC % %	REC Limits %	RPD % %	RPD Limit %	Notes
Blank (2035017-BLK1)					Prepared: 08/25/20 1 Analyzed: 08/25/20 2				
Chloride	ND	20.0							
LCS (2035017-BS1)					Prepared: 08/25/20 1 Analyzed: 08/25/20 2				
Chloride	247	20.0	250		98.7	90-110			
Matrix Spike (2035017-MS1)					Source: P008083-01 Prepared: 08/25/20 1 Analyzed: 08/26/20 0				
Chloride	268	20.0	250	23.0	98.1	80-120			
Matrix Spike Dup (2035017-MSD1)					Source: P008083-01 Prepared: 08/25/20 1 Analyzed: 08/26/20 0				
Chloride	270	20.0	250	23.0	98.7	80-120	0.532	20	

QC Summary Report Comment:

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

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Enduring Resources, LLC
511 16th Street, Suite 700
Denver CO, 80202

Project Name: Marshall A3
Project Number: 17065-0017
Project Manager: James McDaniel

Reported:
08/27/20 12:27

Notes and Definitions

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

RPD Relative Percent Difference

** Methods marked with ** are non-accredited methods.

Soil data is reported on an "as received" weight basis, unless reported otherwise.

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Project Information

Chain of Custody

Page 1 of 1

Client: Exxon Bill To: J. McDaniel Lab Use Only: PC08084

Project: Marshall A S Attention: J. McDaniel Lab WQV: PC08084 Job Number: 1005-007

Project Manager: J. McDaniel Address: Am 8/25 Analysis and Method: Am 8/25

City, State, Zip: Am 8/25 State: Am 8/25

Phone: Am 8/25 NM CO UT AZ

Email: Am 8/25 TX OK

Report due by: Am 8/25

Time Sampled	Date Sampled	Matrix	No Containers	Sample ID	Lab Number	DRQ/DRO by 8015	GRQ/DRO by 8015	BTEX by 8021	VOC by 8260	Metal 6010	Chloride 300.0	Remarks
8/20	8/25/20	S	1	Bottom 9'	1	X	X	X		X		
9:15	8/25/20	S	1	South Wall	2	X	X	X		X		

Additional Instructions:

I, (field sampler), attest to the validity and veracity of this sample. I am aware that tampering with or intentionally misrepresenting sample location, date or time of collection constitutes a crime and may be grounds for legal action. Sampled by: J. McDaniel

Relinquished by: (Signature) J. McDaniel Date: 8/25/20 Time: 2:30 Received by: (Signature) J. McDaniel Date: 8/25/20 Time: 14:32

Relinquished by: (Signature) J. McDaniel Date: 8/25/20 Time: 14:32 Received on ice: N

Relinquished by: (Signature) J. McDaniel Date: 8/25/20 Time: 14:32 T1: 4.0 T2: 4.0 T3: 4.0

AVG Temp °C 4.0

Sample Matrix: S - Soil, Sd - Solid, Sg - Sludge, A - Aqueous, O - Other _____ Container Type: g - glass, p - poly/plastic, ag - amber glass, v - VOA

Note: Samples are discarded 30 days after results are reported unless other arrangements are made. Hazardous samples will be returned to client or disposed of at the client expense. The report for the analysis of the above samples is applicable only to those samples received by the laboratory with this COC. The liability of the laboratory is limited to the amount paid for on the report.



5795 US Highway 64, Farmington, NM 87401
24 Hour Emergency Response Phone (800) 302-1879

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Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
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Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS

Action 10090

CONDITIONS

Operator: ENDURING RESOURCES, LLC 6300 S Syracuse Way, Suite 525 Centennial, CO 80111	OGRID: 372286
	Action Number: 10090
	Action Type: [C-144] PIT Generic Plan (C-144)

CONDITIONS

Created By	Condition	Condition Date
vvenegas	None	11/4/2021