BW-028

ANNUAL REPORT

2017



ANNUAL CLASS III WELL REPORT FOR 2017 Key Energy Services, Inc. (Key) State S Brine Station Permit BW-028 API No. 30-025-33547 May 01, 2018

Submitted by: _____

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Bullet Point 2- Summary of Operations:

(Permit Condition 2.J.2 Annual Report: "Summary of Class III well operations for the year including a description and reason for any remedial or major work on the well with a copy of C-103.")

During the 2016 year, The OCD requested a cavern MIT, and after some issues that caused Key to cease operations temporarily, operations were resumed in 2017. See **Bullet Point 6** for additional detail information.

General housekeeping was routinely performed and daily on-site visits were conducted to ensure permit conditions are maintained.

Key Energy has a Web based monitoring and automation system at this site. This system monitors all equipment, fluid levels, and driver access. The integrated Control System (ICS) system also sends out alarms to personnel via text or Email, as well as, allows users to monitor and control remotely via the WWW.

Yearly cavity size calculations were analyzed to determine cavern size and stability. The calculated cavern radius grew about one foot this year, from 78 feet to 79 feet, for an estimated worst-case maximum diameter of 158 ft.

The "Area of Review" was up-dated and is described in detail below. The cavern subsidence monitors were surveyed and only very minor variation was noted.

Included in *Appendix G* is a copy of the Approved Discharge Permit for reference.

Bullet Point 3- Production Volumes:

(Permit condition 2.J.3 "Monthly fluid injection and brine production volume, including the cumulative total carried over each year"

Key has an electronic card system that tracks sales of both fresh and brine water. In addition, Key has Halliburton flow meters on the well to monitor both water injected and brine produced. The operator reads these flow meters daily. The meters are not currently connected to the ICS system.

Monthly, Yearly and Lifetime Injection and Production Volumes:

The monthly, yearly and lifetime fresh water injection and brine production volumes are attached herein for review in <u>Appendix A</u>. The total 2017 brine production volume was 220,196 bbl. and the lifetime production volume is 5,514,464 bbl.

Bullet Point 4- "Injection Pressure Data."

(Permit condition 2.J.4 "Injection Pressure Data"

A new submersible centrifugal injection pump was installed in the fresh water storage tank in the 2014 year. The system has an automatic shut-down switch set at 224 psig.

For this reason, permit condition 3.B.2. **Pressure Limiting Device:** *"The operator shall have a working pressure limiting device or controls to prevent overpressure."* is conditionally met.

The average injection pressure is noted by Key's personal and is reported to range from 182 psig to 195 psig, This reading is taken either from a pressure gauge mounted on the wellhead inlet, and/or can be from the ICS.

Bullet Point 5- Chemical Analysis:

(Permit condition 2.J.5 "A copy of the quarterly chemical analysis shall be included with data summary and all QA/QC information.")

Please find attached in <u>Appendix B</u> the quarterly chemical analysis and chainof-custody of the brine and fresh water injection water samples, collected for the annual report. The laboratory used common approved EPA methods to analyze and reporting.

The first two quarters of 2017 has the fresh water results in tabulated form, but the Brine Water analysis was not supplied. It appears the brine water analysis may have been ran, but due to an unexpected turnover in the Key Environmental Division personnel, these results were not readily available for the 2017 report.

Fresh and Brine water samples were collected in June, July, October and November of 2018 and are included in **Appendix** B.

Special Note: The identification of fresh water samples was inadvertently referred to as "Fresh Water Well". Key does not have fresh water wells at this site, as the water is supplied from the City of Eunice, NM's fresh water supply pipeline.

The analysis revealed the brine water is predominately sodium chloride with a density of 1.20 specific gravity, which equates to normal 10 lb brine water. This analysis is very representative of Salado "Salt" formation waters found in the area.

Key Energy routinely performs field-testing to ensure brine well quality. This testing generally shows close to 10 lb brine using the field method.

The June 2017 brine water analysis appears to have been inadvertently labeled fresh water by another party. (Price LLC flagged this out on the report)

The July 2017 results were skewed as Key had shut down their well to investigate some fresh water quality issues. None were found. This may have been due to improper sampling location, or an anomaly in the fresh water supply.

Bullet Point 6- Mechanical Integrity:

(Permit condition 2.J.6 "Copy of any mechanical integrity test chart, including the type of test, i.e., duration, gauge pressure, etc;")

On or about late November or early December of 2016, a cavern MIT was attempted and some issues were experienced. The well apparently would not pressure up to the required 300 psig as normally required by the OCD. In addition, once the pumping was halted, it was noted the well pressure dropped substantially overnight.

The OCD requested Key to shut-in the well with a concern the well cavern may have been fractured or there was a casing leak.

As a result, OCD required Key to pull the tubing and run standard 30-minute casing test, which was performed on December 27, 2016.

The test was successful and approved by OCD. OCD then required Key to perform a cavern test to determine if the cavern had mechanical integrity.

On February 2, 2017, Key ran a 4-hour Cavern pressure test at an approved reduced test pressure of 220 psig. The test passed and OCD approved Key to continue brine well operations.

Key will continue to evaluate and collect information pertaining to the well issue.

As noted above, a 4-hour Cavern Mechanical Integrity Test (MIT) was successfully ran and passed on February 02, 2017 and subsequently approved by OCD.

The next five-year test will be scheduled for November of 2021, unless otherwise required by OCD for good cause shown, or permit condition requirements.

Please find in *Appendix "D"* a copy of the approved C-103s, test charts with meter calibration notes, and documentation of the MIT process.

<u>Recommendations</u>: Key Energy recommends that when running a cavern formation test in the future, both parties, Key and OCD agree upon a pressure that will not exceed the fracture pressure of the cavern.

It appears that since the agency (OCD) requested the flow in the well to go back to normal flow (fresh water down the tubing, and brine water up the casing),

neither party may not have taken into account the additional pressure exerted by the heavier fluid in the casing during testing.

While there is some confusion on Key's part as to whether OCD required Key to go to a pressure that was used in the past is really a mute point, as the normal 300 psig required on the casing appears to exceed the frac pressure of this well.

Key also requests that OCD continue to be flexible in allowing the cavern test to be under 300 psig, and a pressure not to exceed the frac pressure when using fluids as the pressure media, or to allow other media such as gas (Nitrogen) to perform the test if 300 psig is required.

Key wants to point out this last test cost Key Energy several thousands of dollars in trying to re-enter the well after the required Casing MIT. The workover unit was on the well for eleven days (11) trying to re-establish production.

Key should place a sign on the well indicating maximum pressures.

Bullet Point 7- Deviations from Normal Production Methods:

(Permit condition 2.J.7 "Brief explanation describing deviations from normal operations.")

In 2008 two OCD permitted brine wells collapsed. As a result of those incidents, the OCD issued a temporary moratorium on new brine well permits. During the moratorium OCD facilitated a work group to determine a proper path forward for current and new brine well operations.

As a result of those proceedings, OCD issued instructions to operators to change OCD's previous requirement of injecting fresh water down the annulus and producing brine up the tubing; to injecting fresh water down the tubing and producing brine up the annulus.

On June 1, 2009 Key followed OCD instructions and change the flow pattern. It should be noted that it took over a month in order to obtain 10# brine.

During the 2017 year, Key continued the normal flow production procedure and encountered no problems during this time.

Bullet Point 8- Leak and Spill Reports:

(Permit condition 2.J.8 "Results of any leaks and spill reports;")

The brine station is designed with an impermeable liner under the brine tanks and loading pads. The concrete loading pads are designed to catch de-minimus drips from hose connections and are piped to two 250 bbl fiberglass tanks. This liquid material is routinely re-cycled or disposed of at an OCD approved site. Rainwater that collects inside of the lined bermed area is routinely pumped out and re-cycled or disposed of at an OCD approved site. Small quantities of rainwater, which cannot be pumped are left to evaporate.

The entire facility is bermed to prevent run-on or run-off. Any reportable or non-reportable spill is cleaned up pursuant to OCD rules and guidance.

Bullet Point 9- Area of Review Update Summary:

(Permit condition 2.J.9 "An Area of Review (AOR) update summary;")

An extensive AOR review was conducted for the Key Eunice "Old GoldStar" brine well, OCD permit # BW-28, located in UL E (1340 FNL & 330 FWL) of Section 15-Ts21S-R37E. Key used OCD records and field verification to confirm wells in the AOR.

Using OCD on-line files, a well status list and aerial AOR plot plan has been constructed (see <u>Appendix C</u>) listing all wells within adjacent quarter sections of the BW-28 location. The list shows API#, Operator well name, UL, Section, Township and Range, footages, wells within 800 ft and ¼ mile, well checked for casing program status, casing/cementing status, and corrective action required status.

There are a total of 44 wells located within these adjacent units, with no wells added in 2017. Within a ¼ mile radius of the brine well there are 18 wells, and 4 wells are actually within the 800- foot critical radius.

This comprehensive list was formulated to provide a baseline for future AOR studies. Since any future brine wells may be limited in size, a critical AOR was established, and all wells within that radius will be researched in greater detail.

The rational of this approach is the fact that brine wells are non-static in terms of size and configuration and the fact that Key has no direct control on wells drilled in close proximity. By just initially focusing on the current wells in the ¼ mile AOR and assuming the status of these wells will remain the same could be a mistake.

Therefore, Key is taking a more dynamic approach and will study wells as the brine well grows, especially wells in the critical zone. We used the current estimated diameter of the brine well i.e. 158 ft (r = 79.0 ft) up-dated for 2017, and added a 10:1 safety factor which equates to about 790 ft. As the brine well grows, the critical AOR will be expanded and new wells will be added.

All four wells located in the critical zone were reinvestigated by checking the OCD on-line well records. They are identified as API# 30-025-09914, 30-025-09913 (P&A), 30-025-06586, and 30-025-39277. (Checked by Price LLC, April 11, 2018).

In late November and early December of 2016, Apache performed a well workover on its WBDU Unit #113 API (30-025-39277). The work included several high-pressurized acid jobs in the well bore. This well is located in the Key brine well critical zone and is approximately 500-600 feet apart. Included in *Appendix C* is an aerial photo showing the proximity of the two wells.

<u>Recommendations</u>: Key should notify Apache that their well is located in our critical AOR.

Bullet Point 10- Subsidence/Cavern Volumes/Geometric Measurements

(Permit condition 2.J.10. "A summary with interpretations of MIT's, surface subsidence surveys, cavern volume and geometric measurements with conclusion(s) and recommendation(s);")

The last cavern survey did not provide adequate information pertaining to the size of the cavern. This has been an issue with many brine wells and until the validity of using sonar test is resolved, an alternate method will be employed.

This alternate method has been discussed with Jim Griswold-OCD and it was mutually decided that an estimated worst-case diameter was to be determined in order to provide maximum protection and ensure the permit conditions are being met.

The Solution Mining Research Institute (SMRI), other state agencies, OCD workgroup, along with various studies conducted during the permitting of the WIPP site, has concluded that failures, such as "catastrophic collapses", have a higher probability when the roof diameter of the cavern exceeds a certain value compared to the actual depth of the cavern. This number is typically called D/H where "D" is the diameter of the cavity and "H" is the depth from surface to the casing shoe. Various reports seem to conclude that when a ratio of D/H reaches or exceeds 0.66 then the probably of collapse increases to a point that the well may be considered un-safe, thus closing procedures, such as proper plugging and abandonment, and possible long term subsidence monitoring should be considered.

The alternate method mentioned above involves calculating the maximum diameter of the cavern by using a worst-case scenario of an "*inverted cone" i.e. base located at the top*.

The cavern volume is calculated using the lifetime brine production volume and multiplying it by a *"rule of thumb"* conversion factor to determine the volumetric size of the cavern. The rule of thumb conversion factor was taken from the 1982 Wilson Report, which equates that every barrel of brine produced, will create approximately one cubic foot of cavity.

Please find attached in <u>Appendix H</u>, a wellbore sketch depicting the volume calculations for the brine well, and the lifetime brine production tally of approximately 5.514 million barrels of brine produced as of December 2017. The

maximum diameter was calculated to be approximately 158 feet with a corresponding D/H ratio of 0.11, updated for the 2017 year.

Comparing the current D/H ratio of 0.12 to the 0.66 value mentioned above, it can be concluded that the current brine well status meets and exceeds the recommended safety value by five times.

Permit Condition 2.B. SOLUTION CAVERN MONITORING PROGRAM:

1. Surface Subsidence Monitoring Plan: The Permittee shall submit a Surface Subsidence Monitoring Plan to OCD within 180 days of the effective data of this permit. The Surface Subsidence Monitoring Plan shall specify that the Permittee will install at least three survey monuments and shall include a proposal to monitor the elevation of the monuments at least semiannually.

The Permittee shall survey each benchmark at least semiannually to monitor for possible surface subsidence and shall tie each survey to the nearest USGS benchmark. The Permittee shall employ a licensed professional surveyor to conduct the subsidence-monitoring program. The Permittee shall submit the results of all subsidence surveys to OCD within 15 days of the survey. If the monitored surface subsidence at any measuring point reaches 0.10 feet compared to its baseline elevation, then the Permittee shall suspend operation of the Class III well . If the Permittee cannot demonstrate the integrity of the cavern and well to the satisfaction of OCD, then it shall cease all brine production and submit a corrective action plan to mitigate the subsidence.

<u>Key Response</u>: Please find enclosed in "**Appendix E**" a copy of the 2017 subsidence monitoring report. There was one slight deviation of .01" (up) observed on one of the monitoring points. Key will continue to monitor and if any trend is noted, will notify OCD.

Special Note: Key <u>requested a Minor Modification</u> that allows the results be supplied in the annual report, unless there is an exceedance, as noted in the permit. OCD approved the modification and the approval is included in "Appendix E".

2. Solution Cavern Characterization Program: The Permittee shall submit a Solution Cavern Characterization Plan to characterize the size and shape of the solution cavern using geophysical methods within 180 days of the effective date of this permit. The Permittee shall characterize the size and shape of the solution cavern using a geophysical methods approved by OCD at least once before November 8, 2018. The Permittee shall demonstrate that at least 90% of the calculated volume of salt removed

based upon injection and production volumes has been accounted for by the approved geophysical method(s) for such testing to be considered truly representative.

Solution Cavern Characterization Plan: Key proposed to use a combination of calculated results as determined above, and will experiment with various geophysical methods, including actually performing an "Induced Current Method" and report these results in the annual report.

The 'Induced Current' Method has not been totally successful, primarily to bad connections; low DC voltage used, capacitance effect, and ground interference. Key will investigate other methods and consult with OCD on this issue. The old fashion cavern calculation continues to be the best economic method available.

Special Note: In an E-mail dated April 3, 2018 OCD (Mr. Carl Chavez Environmental Engineer) notify Wayne Price LLC that a study group was not being planned, but OCD is now accepting the Cone Calculation method when an additional well log is supplied supporting the calculation. OCD sent an example and is included in **Appendix "H"**.

Since the BW-28 well never had any logs run, a well log was obtained from a nearby well and annotated to reflect the geophysical characterization of the area lithology. In addition a mass balance has been calculated and the results are included in **Appendix 'H''**.

The mass balance compares the measured salt removed to the calculated salt removed. The comparison was within 9%, which satisfies permit condition 2.

Key would like to point out that the OCD example showed a cone with the base at the bottom, while Key has always used a cone with the base inverted to present the Worst Case analysis of a roof collapse.

Both methods will work, but the D/H critical calculation has to use the inverted base to obtain the proper D/H ratio.

Bullet Point #11- Ratio of Injected/Produced Fluids

(Permit condition 2.J.11 "A summary of the ratio of the volume of injected fluids to the volume of produced brine;")

Enclosed in <u>Appendix A</u> is the tables section of the report showing the injection and production data and the comparison chart of injected water to produced water with comments.

The 2017 results show a somewhat normal 105.6% variance, while the total variance during the life of the well is 106.0%.

Special Note: Key Energy requests a minor modification of the permit

requirement 3.K *"The Permittee shall suspend injection if the monthly injection volume is less than 110% or greater than 120% of associated brine production. If such an event occurs, the Permittee shall notify OCD within 24 hours."*

And a *Minor Modification* to permit requirement 2.B.2.b, which has similar language to above, but sets a variance between 90% to 110%. This requirement seems to fit the Key BW-28 better, but there are still times that the monthly variance can be out side of this range, while there is no immediate issue at hand.

Generally the Annual variance does fall into the 90%-110% range.

Dear Jim Griswold-NMOCD Environmental Bureau Chief and Carl Chavez Environmental Engineer.

As you know, this topic has been discussed and kicked around for a long time. The current permit requirements do not take into account many factors that can cause the normal variance to be under or over the requirement of 110%-120% and outside of the range of 90% to 110%, notwithstanding some anomaly.

The theoretical 115% ratio came about using the rule of thumb from the "Old Wilson" report that 1 barrel of 10 lb. brine causes a cavity increase of approximately one cubic foot. If you back calculate, this equates to a salt density of about 90 lbs./ft3.

Many deeper brine wells such as the Key BW-28 will probably has a higher salt density, possibly even up to 100-120 lbs./ft3. Thus, it requires less fresh water to make 10 lb. brine water, which lowers the Fresh Water/Brine Water ratio.

As long as the brine well can make a quality brine and does not experience any unexpected loss in pressure, the requirement to suspend operations is not based on any real parameter or trend that may be an immediate threat to the well, groundwater or the environment. The current requirement puts some operators in a continuous violation and interruption of operations.

Of course notwithstanding, if you have a well that produces for extended periods of time, or starts to pressure up, then you know you may have communicated to a pressure zone, or, if the well loses circulation and/or pressure, then immediate action should be taken and notification to the agency made.

The point to be made here is that the permit required parameters are a trailing indicator not a leading indicator. Of course a continued pattern that deviates from the statically norm (emphasis on norm for a particular well) would be cause for concern. However, this concern may or may not, be an indication of possible collapse, which appears to be OCD's main emphasis for the monitoring. Currently the permit could reads as follows:

The Permittee shall immediately suspend injection and notify the agency within 72 hours, if the Fresh Water Injection does not cause a normal immediate return of Brine Water to the surface, or if the well flows excessively for an unusual amount of time without fresh water injection after the cavern pressure has been stabilized to it's normal operating pressure, or if permittee has become aware of any out of zone injection or communication. The Permittee shall include in each annual report a summary showing the monthly variance, the average monthly variance for the year and the total accumulative variance over the life of the well. The operator shall certify and explain that any yearly variance that falls outside of the range of 20%, (Difference between the normal ratio of Fresh Water input and Brine Water output) will not cause harm to Fresh Water, Public Health or the Environment.

The point here is that each operator should determine the normal range for their specific well and relay that to the agency in the annual report.

Bullet Point #12- Summary of Activities

(Permit condition 2.J.12 "A summary of all major Facility activities or events, which occurred during the year with any conclusions and recommendations;)

See Bullet Point #2 for summary.

5.B. BONDING OR FINANCIAL ASSURANCE: The Permittee shall submit an estimate of the minimum cost to properly close, plug and abandon its Class III well, conduct ground water restoration if applicable, and any post-operational monitoring as may be needed (see 20.6.2.5210B(17) NMAC) within 90 days of permit issuance (See 20.6.2.5210B(17) NMAC). The Permittee's cost estimate shall be based on third person estimates. After review, OCD will require the Permittee to submit a single well plugging bond based on the third person cost estimate.

Appendix "F" contains a third party closure estimate for the Eunice BW-28 brine well.

Bullet Point #13- Annual Certification

(Permit condition 2.J.13 "Annual Certification in accordance with Permit Condition 2.B.3. **"2.B.3. Annual Certification:** The Permittee shall certify annually that continued salt solution mining will not cause cavern collapse, surface subsidence, property damage, or otherwise threaten public health and the environment, based on geologic and engineering data.")

Operator Response: Based on all current information and actual on-site observance, the operator of record herby certifies that the current operations pose no threat to public health and the environment at the submission of this report. If any substantial event that, has or may cause, this current certification to change, then the operator will notify OCD and take the necessary actions to protect the public and environment.

By signing the cover sheet of Bullet Point 1 of permit condition 2.J.1, the operator hereby certifies this condition of the permit.

Bullet Point 14- Groundwater Monitoring:

(Permit condition 2.J.14 "A summary of any new discoveries of ground water contamination with all leaks, spills and releases and corrective actions taken;")

The BW-28 facility does not have groundwater monitoring at this site. There are no planned or intentional discharges of water contaminants that may move directly or indirectly into groundwater. Any unintentional discharge, leak, spill, or drip is handled pursuant to the permit conditions.

Bullet Point 15- Annual Reporting

(Permit condition 2.J.15 "The Permittee shall file its Annual Report in an electronic format with a hard copy submitted to OCD's Environmental Bureau.")

The operator hereby submits a PDF file on flash drive and can supply a hard copy upon request.

Appendix A-

Production Table &
 Injection Comparison Chart

		Reported	TABLE 1 B	W-28 Annual F	Report Brine Well P	Ouarterly	mes and Lifet	ime History Volum	es
Year	Month	Monthly	Quarterly Brine	Annual Brine Production	Reported Monthly Freshwater	Freshwater	Freshwater	Comments	Operator
.ca	month	Brine Production	Production (bbls)	(bbls)	Injection (bbls)	(hbls)	(hbls)	oononto	operator
1996	October	10,588			10,588	(0013)	(0013)		Goldstar SWD
	November December	17,770	60 581	60 581	17,743	61 335	61 335		
1997	January	20,194	00,381	00,001	20,445	01,535	51,535	estimate (1)	
	February	20,194	(0.593		20,445	(1.225		estimate (1)	
	April	48.226	60,582		47,714	61,335		estimate (1)	
	May	38,000			36,571				
	June	47,970	134,196		42,264	126,549			
	August	31,817			31,559				
	September	38,120	94,648		38,697	94,527			
	October November	27,462 26.618			25,512				
	December	16,137	70,217	359,643	15,850	67,623	350,034		
1998	January	13,301			13,614				
	March	42,337	102,850		44,964	108,130			
	April	27,072			27,519				
	June	26,699	71,855		26,976	72,656			
	July	16,535		1	15,929				
	August	8,287	34 816		7,488	32 438			
	October	13,312	01,010		17,302	02,100			
	November	9,822	21.424	240.040	9,873	34 470	240.007		
1999	January	4,026	31,421	240,942	4,607	30,0/2	249,896		
	February	6,867			8,138				
	warch April	5,641	16,534		6,030	18,775			-
	May	34,100			32,461				
	June	20,708	62,681		20,171	59,970			
	August	35,876			34,566				
	September	43,196	114,350		42,724	113,285			
	October November	9,700			10,097				4
	December	28,662	46,745	240,310	29,721	48,898	240,928		
2000	January	65,492			65,028				
	March	40,409	143,610		40,414	142,351			
	April	20,181			20,404				
	May June	52,092	113.644		50,373	108.553			4
	July	33,860		1	31,757				
	August	37,535	100 407		35,492	100 507			
	October	28,777	129,437		27,216	120,537			
	November	22,677			24,130				
2001	December January	17,670	69,124	455,815	17,369	68,715	440,156		
2001	February	17,493			23,076				
	March	34,050	83,970		33,216	93,375			
	April May	32,900			36,064				Change to Yale E. Key
	June	37,607	137,231		42,347	130,966			
	July	16,399			15,588				
	September	16,185	42,757		16,200	65,452			
	October	25,184			24,147				
	December	21,061	56,692	320,650	18,733	51,546	341,339		
2002	January	11,809			10,135				
	February March	22,700	39.202		23,733	38.237			
	April	15,160	57,202	1	16,776	23,237			1
	May	16,321	15 /10		17,283	10 325			4
	July	8,301	40,419		10,688	47,333			
	August	7,079			6,842	A			
	September October	18,560	33,940		17,240	34,770			•
	November	9,788			10,950				1
2002	December	11,666	28,494	147,055	19,667	38,440	160,782		4
2003	February	8,603			<u>23,526</u> <u>5,3</u> 10				1
	March	37,680	66,561		35,548	64,384			
	мрги Мау	31,/82			13.305				•
	June	10,733	60,282		9,260	54,184			
	July	27,104			13,927				-
	September	7,945	44,604		5,056	26,180			
	October	12,014			10,394				1
	December	26,100	76,862	248,309	12,438	41,050	185,798		1
2004	January	7,980			8,539				
	rebruary March	8,130	24 330		8,797	26 220			-
	April	29,898	24,330	1	31,931	20,230			
	May	14,233	70.017		15,428	77 7/0			
	July	28,716	/2,84/		2,060	//,/69			
	August	29,898			30,201				
	September October	20,277	52,015		20,266	52,527			4
	November	21,925			22,430				1
2005	December	32,225	78,586	227,778	33,630	79,844	236,370		1
2005	January February	17,873			19,160				•
	March	37,896	79,698		40,435	84,553			
	April May	29,882			31,794				4
	June	22,766	92,223		23,995	98,174			1
	July	7,593			7,640				
	August September	31,573	86.471		29,316	85.186			•
	October	38,571	30,471	1	51,230	55,100			1
	November	31,533	101 50 -	244.000	27,670	115 04 -	202.027		
	IN THE REPORT	1 55 4 301	106.534	i 304.926	36,412	115.314			1

	-	Deported	TABLE 1 E	W-28 Annual I	Report Brine Well F	Production Volu	mes and Lifet	ime History Volume	25
		Monthly	Quarterly Brine	Annual Brine	Reported Monthly	Ereshwater	Ereshwater		
Year	Month	Brine	Production (bbls)	Production (bbls)	Freshwater	Injection	Injection	Comments	Operator
2004	lanuani	Production		(6613)	10.077	(bbls)	(bbls)		
2006	February	33.250			35.511				
	March	39,492	91,222		38,630	94,118			
	April	40,194			43,605				
	May	51,009	113 577	,	54,630	123.067			
	July	38.208	113,377	-	37.613	123,007			
	August	35,627			36,201	1			
	September	48,784	122,619	2	47,312	121,126			
	October	50,375			51,232				
	December	26,084	84.683	412 101	27,670	89 104	427 415		
2007	January	31,540	01,000	112,101	33,320	07,101	127,110		
	February	24,313			25,260	1			Change to Key Energy Services
	March	40,514	96,367	<u>'</u>	38,412	96,992			
	April	34,095			35,120				
	June	9,170	62.573		11.009	69.259			
-	July	30,857		1	28,468				
	August	12,394			18,884				
	September	25,970	69,221	-	23,360	70,712			
	November	2.476			2.630				
	December	3,933	14,291	242,452	4,528	14,801	251,764		
2008	January	1,706			1,982				
	February	5,845			6,203				
	March	21,386	28,937	-	21,6/3	29,858			
	May	17,100			19,842	1			
	June	16,598	59,485		17,479	60,025			
	July	32,458			36,448				
	Sentember	37,458	109 861		38,377	112 028			
	October	25.572	107,001	-	26.551	112,020			
	November	27,325			25,792	1			
	December	26,825	79,722	278,005	28,694	81,037	282,948		
2009	January	20,990			21,310				
	March	3.249	24.889		3,420	26.036			
	April	5,428		1	5,360				
	May	1,343			1,762				
	June	630	7,401	-	1,232	8,354			
	August	1,546			1,673				
	September	2,672	5,099	,	2,930	5,634			
	October	9,898			8,861				
	November	3,716	45.000	50.477	3,618		54 500		
2010	December	1,4/4	15,088	52,477	2,035	14,514	54,538		
	February	1,650			1,810	1			
	March	4,092	5,742	·	4,789	6,599			
	April	5,092			6,150				
	lupe	12,256	10 / / 7		2 033	23 136			
	July	5.068	17,447	-	6.322	23,130			
	August	10,270			15,126	1			
	September	11,281	26,619	2	10,334	31,782			
	November	20 304			24 494				
	December	36,765	64.644	116.452	44,153	77.449	138.966		
2011	January	44,126			52,975				
	February	24,388			29,666				
	March	19,421	87,935	<u>-</u>	23,284	105,925			
	May	9,828			11.754				
-	June	15,661	43,845	i	18,902	53,021			
	July	17,503			20,961				
	August	14,401			17,273	54.004			
	October	5,430	37,334	-	8 284	54,234			
	November	18,585			19,662	1			
	December	23,228	53,172	222,286	27,806	55,752	268,932		
2012	January	21,570			25,897				
	March	12,230	43 924		12 190	52 941			
	April	18,185	10,721	1	22,110	02,711			
	May	23,761	1		28,667				
	June	31,207	73,153	<u>.</u>	37,707	88,484			
	July	20,931			25,225				
	September	29,414	81.370		34,226	95.288			
	October	17,507		1	21,138				
	November	28,038			33,360				
0010	December	23,015	68,560	267,007	25,205	79,703	316,416		
2013	January	16,097			21,395				
	Fobruary	17 370			20,012	,			
	February March	17,379	48.292		21.978	64.185			
	February March April	17,379 14,816 19,374	48,292		21,978 23,799	64,185			
	April May	17,379 14,816 19,374 23,932	48,292	<u>.</u>	21,978 23,799 25,979	64,185			
	April May June	17,379 14,816 19,374 23,932 34,926	48,292		21,978 23,799 25,979 38,500	64,185			
	February March April May June July	17,379 14,816 19,374 23,932 34,926 18,446	48,292 78,232	<u>.</u>	21,978 23,799 25,979 38,500 22,414	64,185			
	February March April May June July August Sentember	17,379 14,816 19,374 23,932 34,926 18,446 29,958 16,923	48,292		21,978 23,799 25,979 38,500 22,414 35,877 20,230	64,185 88,278			
	February March April May June July August September October	17,379 14,816 19,374 23,932 34,926 18,446 29,958 16,923 22,409	48,292 78,232 65,327		21,978 23,799 25,979 38,500 22,414 35,877 20,230 25,868	64,185 88,278			
	February March April May June July August September October November	17,379 14,816 19,374 23,932 34,926 18,446 29,958 16,923 22,409 14,139	48,292 78,232 65,327		21,978 23,799 25,979 38,500 22,414 35,877 20,230 25,868 16,972	64,185 - - - 78,521			
	February March April May June July August September October November December	17,379 14,816 19,374 23,932 34,926 18,446 29,958 16,923 22,409 14,139 24,920	48,292 78,232 65,327 61,468	253,319	21,978 23,799 25,979 38,500 22,414 35,877 20,230 25,868 16,972 29,762	64,185 88,278 78,521 72,602	303,586		
2014	February March April May June July August September October November December January	17,379 14,816 19,374 23,932 34,926 18,446 29,958 16,923 22,409 14,139 24,920 31,460	48,292 78,232 65,327 61,468	253,319	21,978 23,799 25,979 38,500 22,414 35,877 20,230 25,868 16,972 29,762 35,865	64,185 88,278 78,521 - 72,602	303,586		
2014	February March April May June July August September October November December January February	17,379 14,816 19,374 23,932 34,926 18,446 29,958 16,923 22,409 14,139 24,920 31,460 38,614	48,292 78,232 65,327 61,468	253,319	21,978 23,799 25,979 38,500 22,414 35,877 20,230 25,868 16,972 29,762 35,865 45,444	64,185 88,278 78,521 72,602	303,586		
2014	February March April May June July August September October November December January February March Acel	17,379 14,816 19,374 23,932 34,926 18,446 29,958 16,923 22,409 14,139 24,920 31,460 38,614 43,210 26,237	48,292 78,232 65,327 61,468 113,284	253,319	21,978 23,799 25,979 38,500 22,414 35,877 20,230 25,868 16,972 29,762 35,865 45,444 50,710 44,572	64,185 - - - - - - - - - - - - - - - - - - -	303,586		
2014	February March April May June July August September October November December January February March April May	17,379 14,816 19,374 23,932 34,926 18,446 29,958 16,923 22,409 24,920 31,400 38,614 43,210 36,217 45,170	48,292 78,232 65,327 61,468 113,284	253,319	21,978 23,799 25,979 38,500 22,414 35,877 20,230 25,868 16,972 29,762 35,865 45,444 50,710 44,597 54,007	 64,185 88,278 78,521 72,602 132,019 	303,586		
2014	February March April June July August September October November December January February February March April May June	17,379 14,816 19,374 23,932 34,926 18,446 29,958 16,923 22,409 14,139 24,920 31,460 38,614 43,210 36,217 45,170 24,524	48,292 78,232 65,327 61,468 113,284 105,911	253,319	21,978 23,799 25,979 38,500 22,414 35,877 20,230 25,868 16,972 29,762 35,865 45,444 50,710 44,597 54,007 23,748	 64,185 88,278 78,521 72,602 132,019 122.352 	303,586		
2014	February March April June July August September October November December January February March April May June July	17,379 14,816 19,374 23,932 34,926 18,446 29,958 16,923 22,409 14,139 24,920 31,460 38,614 43,210 36,617 45,170 24,524 19,428	48,292 78,232 65,327 61,468 113,284 105,911	253,319	21.978 23.799 25.979 38.500 22.414 35.877 20.230 25.868 16,972 29,762 35.865 45,444 50.710 44.597 54.007 2.3,748 20,442	64,185 88,278 78,521 72,602 132,019 122,352	303,586		
2014	February March April May July July August September October November January February March April May July July July August	17,379 14,816 19,374 23,932 34,926 18,446 29,958 16,923 22,409 14,139 24,920 31,460 38,614 43,210 38,617 45,170 24,524 19,428 15,545	48,292 78,232 65,327 61,468 113,284 105,911	 	21,978 23,799 25,979 22,414 35,877 20,230 25,868 16,972 29,762 35,865 45,444 50,710 44,597 54,007 23,748 20,442 24,683		303,586		
2014	February March April May June Juny September October November December January February March April May June June Juny September	17,379 14,816 19,374 23,932 34,926 18,446 29,958 16,923 22,409 14,139 24,920 31,460 38,614 43,210 36,217 45,170 24,524 19,528 115,548 23,652 23,652 23,652 24,552 24,552 23,652 24,552 24,552 23,652 24,552 24,552 24,552 25,555 26,555 26,555 26,555 27,5555 27,5555 27,5555 27,55555 27,55555 27,55555 27,5555555555	48,292 78,232 65,327 61,468 113,284 105,911 58,625	253,319	21.978 23.799 25.979 38.500 22.414 35.877 20.230 25.868 16.972 29.762 35.865 45.444 50.710 44.597 54.007 23.748 20.442 24.683 20.442 24.683	<pre>64,185</pre>	303,586		
2014	February March April May June July August September October November December January February March April May June July August September October November	17,379 14,816 19,374 23,932 34,926 18,446 29,958 16,923 22,409 14,139 24,4920 31,460 38,614 43,210 36,217 45,170 24,524 19,428 15,545 23,652 5,692 10,014	48,292 78,232 65,327 61,468 113,284 105,911 58,625	253,319	21.978 23.799 25.979 38.500 22.414 35.877 20.230 25.868 16.972 29.762 35.865 45.444 50.710 44.597 54.007 23.748 20.442 24.663 26.341 7.057 13.152	<pre>64,185</pre>	303,586		
2014	February March April May June July August September October November January February February March April May June July August September October November December	17,379 14,816 19,374 23,932 34,926 18,446 29,958 16,923 22,409 14,139 24,920 31,460 38,614 43,210 36,217 45,170 24,524 19,428 15,545 23,652 5,692 10,914 15,966	48,292 78,232 65,327 61,468 113,284 105,911 58,625 32,572	253,319	21,978 23,799 25,979 22,414 35,877 20,230 25,868 16,972 29,762 35,865 45,444 50,710 44,597 54,007 23,748 20,442 24,683 26,341 7,057 13,130 17,466	 64,185 88,278 78,521 72,602 132,019 122,352 71,466 37,659 	303,586 363,496		
2014	February March April May June July August September October November December January February March April June July August September October November December January	17,379 14,816 19,374 23,932 34,926 18,846 29,958 16,923 22,409 14,139 24,920 31,460 38,614 43,210 24,920 31,460 36,617 45,170 24,524 19,428 15,545 23,652 23,652 24,524 10,914 15,966 22,865	48,292 78,232 65,327 61,468 113,284 105,911 58,625 32,572	253,319	21.978 23.799 25.979 38.500 22.414 35.877 20.230 25.868 16.972 29.762 35.865 45.444 50.710 44.597 54.007 23.748 20.442 24.633 26.341 7.057 13.136 63.0266	<pre>64,185</pre>	303,586 363,496		

	TABLE 1 TABLE 1 BW-28 Annual Report Brine Well Production Volumes and Lifetime History Volumes											
Year	Month	Reported Monthly Brine Production	Quarterly Brine Production (bbls)	Annual Brine Production (bbls)	Reported Monthly Freshwater Injection (bbls)	Quarterly Freshwater Injection (bbls)	Annual Freshwater Injection (bbls)	Comments	Operator			
	April	19,087			24,034							
	Мау	19,573]		22,921							
	June	27,070	65,730		32,555	79,510						
	July	34,975			39,132							
	August	19,234			23,879							
	September	16,952	71,161		20,455	83,466						
	October	23,972			25,739							
	November	18,722			21,557							
	December	13,942	56,636	272,527	17,412	64,708	317,157					
2016	January	15,897			18,182							
	February	15,649			17,434							
	March	10,759	42,305		12,095	47,711						
	April	8,608			9,575							
	May	12,202			14,032							
	June	19,354	40,164		20,745	44,352						
	July	20,725			23,809							
	August	20,410			22,859							
	September	18,278	59,413		21,020	67,688						
	October	24,944			28,521							
-	November	22,899			25,928							
_	December	11,516	59,359	201,241	13,940	68,389	228,140	Ratio FW/BW				
2017	7 January	21,709			23,795			109.61%				
	February	11,551			14,531			125.80%				
	March	20,673	53,933		21,931	60,257		106.09%				
	April	29,467			30,958			105.06%				
	Мау	26,817			27,209			101.46%				
	June	15,463	71,747	4	18,156	76,323		117.42%				
	July	800			1,428			178.50%	* System Shut Down to Check Water Quality			
	August	7,743			6,228			80.43%	*			
-	September	6,279	14,822	4	4,357	12,013		69.39%	*			
	October	23,253	4		24,108			103.68%				
_	November	24,204			27,380			113.12%				
	December	32,237	79,694	220,196	32,445	83,933	232,526	105.60%	Monthly/Year End Average Average			
				5,514,464			5,835,749	106%	Total Average			

Appendix B - Chemical Analysis



Fresh Water Testing Data New Mexico Brine Station

State # 1 Brine Station. Eunice NM

Special Note: Key Energy BW-28 State S Brine Station does not have a fresh water well. Water is supplied by the City of Eunice, NM's fresh water pipeline. By: Price LLC April 11, 2018.



State # 1 Brine Station Aka State S

Permit issued on: Nov 8, 2013

2 Water Wells. Fresh Water Well and Brine Water Well

Quarterly sampling for both wells

API #	30-025-33547	
Discharge Permit Number:	BW - 28	



State S - Fresh Water Well Monitoring

Quarter	Na-	Cl-	TDS
Q3 2015	50.5	57.3	404
Q4 2015	-	-	-
Q1 2016	46.7	65.6	414
Q2 2016	-	-	413
Q3 2016	40.9	22.2	391
Q4 2016	80.7	122	514
Q1 2017	51.5	68.8	452
Q2 2017	389	691	1480



ACCUTEST Gulf Coast

SGS ACCUTEST IS PART OF SGS, THE WORLD'S LEADING INSPECTION, VERIFICATION, TESTING AND CERTIFICATION COMPANY. 07/03/17

e-Hardcopy 2.0 Automated Report

Technical Report for

Key Energy

STATE S Brine Station

SGS Accutest Job Number: TD5345



Sampling Date: 06/16/17

Report to:

Key Energy 6 Desota Drvie Suite 4300 Midland, TX 79705 mcoligan@keyenergy.com; lucas.middleton@soudermiller.com

ATTN: Ana Ramirez

Total number of pages in report: 26





Test results contained within this data package meet the requirements of the National Environmental Laboratory Accreditation Program and/or state specific certification programs as applicable.

Client Service contact: Electa Brown 713-271-4700

Certifications: TX (T104704220-17-27) AR (14-016-0) AZ (AZ0769) FL (E87628) KS (E-10366) LA (85695/04004) NJ (TX010) OK (2016-170) VA (8999)

This report shall not be reproduced, except in its entirety, without the written approval of SGS Accutest. Test results relate only to samples analyzed.

Gulf Coast • 10165 Harwin Drive • Suite 150 • Houston, TX 77036 • tel: 713-271-4700 • fax: 713-271-4770 • http://www.accutest.com



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ACCUTEST

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Sample Summary

Key Energy

Job No: TD5345

STATE S Brine Station

Sample	Collected			Matr	rix	Client		
Number	Date	Time By Received		Code	е Туре	Sample ID		
TD5345-1	06/16/17	09:35	06/24/17	AQ	Water	FRESH WATER WELL		

Summary of	of Hits
------------	---------

Job Number:	TD5345
Account:	Key Energy
Project:	STATE S Brine Station
Collected:	06/16/17

Lab Sample ID Analyte	Client Sample ID	Result/ Qual	RL	MDL	Units	Method
TD5345-1	FRESH WATER	WELL				
Sodium ^a Chloride Solids, Total Dissolved ^b		59700000 170000 292000	50000 10000 1000		ug/l mg/l mg/l	SW846 6010B EPA 300 SM 2540C-2011

(a) Analysis performed at SGS Accutest, Lafayette, LA.

(b) Sample received outside the holding time.



N





Section 3 😡

Sample Results

Report of Analysis



SGS Accutest

				Rep	ort of A	nalysis				Page 1 of 1
Client Sampl	le ID: FRESI	H WATE	R WELL	1			D	ate Sampled:	06/16/17	
Matrix:	AQ - V	Water					D	ate Received: ercent Solids:	06/24/17 n/a	
Project:	STAT	STATE S Brine Station								
Total Metals	Analysis									
Analyte	Result	RL	Units	DF	Prep	Analyzed	By	Method	Prep Me	thod
Sodium ^a	59700000	50000	ug/l	100	06/27/17	06/28/17	ALA	SW846 6010B ¹	SW846 301	0A ²
(1) Instrumen	t QC Batch: L	:MA8234	Ļ							

(2) Prep QC Batch: L:MP8370

(a) Analysis performed at SGS Accutest, Lafayette, LA.



SGS Accutest

	Report of Analysis										
Client Sample ID: Lab Sample ID: Matrix:	FRESH WATER WELLTD5345-1AQ - WaterDate Received:06/24/17Percent Solids:n/a										
Project:	STATE S	S Brine Statio	on			i ci cent bonus	• 11/	u			
General Chemistry	7										
Analyte		Result	RL	Units	DF	Analyzed	By	Method			
Chloride Solids, Total Dissol	ved ^a	170000 292000	10000 1000	mg/l mg/l	20000 1	06/27/17 14:31 06/26/17	ES MS	EPA 300 SM 2540C	2-2011		

(a) Sample received outside the holding time.

Special Note: It appears this water was inadvertently labeled "Fresh" it appears to be high quality Brine Water. By Price LLC April 11, 2018.

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Section 4

Misc. Forms

Custody Documents and Other Forms

Includes the following where applicable:

• Chain of Custody



	SGS ACCU	JTEST		CHAI 10165 Har TEL. 71	N C	DF (te 150 He 0 FAX: accutest.e	CU Puston : 713-	ST . TX 77 271-47	OD	Ŷ				FED-EX	Tracking # utest Quote	8			Bottle C	PA Dider Cor	GE.	5	of
	Client / Reporting Information			Project	Information								Re	que	sted	Ana	Analyses M		Matrix Codes				
Ke	y Energy Services	Project Name: STa	test	Brine	Sh	atio	n																DW Drinking West
(Desta De.	City	Billing Information (If different from Report to) Company Name																GW - Ground Wat WW - Water SW - Surface Wat				
Project	Contact E-mail	Project #	Street A	ddress							-	1									SU - Soll SL- Sludge SED-Sediment		
Arc Phone	mire \$10 keyenergy. Con	Client Purchase	Order #		City				CI.	de		710	-	0									OI - OII LIQ - Other Liquid AIR - Air
Sample	432-571-7953	Project Manager			City State Zip Attention:							Na-									SOL - Other Sole WP - Wipe FB-Field Blank		
	Find Mining		Collec	tion	-		H	17	Number	of prese	rved Bot	ties		32									
SGS lecubest lample #	Field ID / Point of Collection	Date	Time	Sampled By	Matrix	9 of bottles	HCI	ZANaOH	HN03 H2504	NONE	MEOH	NaHSO4	OTHER	F									LAB USE ONL
1	Fresh Water Well	06/16/17	9:35am	Al	W	2	$\left \right $	+		$\left \right $	+	+	X	X		-	-		_				
					-						Ħ	T	t					\downarrow					
					-		H	+	-	+	++	+	+		+	+	Æ	+	+-	-			-
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_							+	+	+	-	++	M.C.	RI	FIE	D 13	1:-	+	+6		-		_	_
1	Turnaround Time (Business days) Standard Sbay RUSH 4 Day RUSH 3 Day RUSH 2 Day RUSH	Approved By (SGS	Accutest PM): / Date:			Commer Commer FULT1 (REDT1 (Commer	cial "/ ciał "l Level Leve	Data D A" (Len 3" (Len 13+4) 13+4) 2"	lelivera vel 1) vel 2)	ble Inf		on TRRP EDD F	ormat					Cor	nments i	/ Speci	al Instruc	tions	
i	1 Day EMERGENCY Emergency & Rush T/A data available VIA Lablink			Form: SM021-				Comme Comme Comme	rcial "A rcial "B rcial "C	" = Re: " = Re:	uits Or uits + (suits + (ily DC Sum	imary urrogal	e Summ	arv								
Rolling	labort hu & Carlor Inst. March	Sar	nple Custody mu	st be docum	nented be	elow ead	h tin	e sam	ples c	hange	poss	ession	, inclu	iding co	ourier de	livery.		_					T
9	ma Kanviz 06/2	3/7 14.00	Tapon EA	4 6/2	3/17	14:	02	,	2 J	ished B	F	sher	-	6/2	10	Date	Time:	Ø	Receive	Ed By:	Es		Date Time:
Relin	uished being of the Date Time:		37555CL	1 42	4/1-	Pate Tim	UZ	0	Relingu 4	ished B	y:		~	/		Date	Time:		Receive 4	ed By:			Date Time:
reenne	Date Time:		Keeewed By: 5			Date Tim	0:		Custod	Seal #				Intact	Pre	served wh	ere appli	icable			On Ice	0	ooler Temp. 2.0

TD5345: Chain of Custody Page 1 of 4



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TD5345: Chain of Custody Page 2 of 4



10 of 26 ACCUTEST TD5345

SGS Accutest Sample Receipt Summary

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Job Number: TD5345	Client: KEY ENERGY	Project: STATE BRINE STATION									
Date / Time Received:	Delivery Method:	Airbill #'s: 674687973810									
No. Coolers: 1 Therm ID	: IR-5;	Temp Adjustment Factor: 0;									
Cooler Temps (Initial/Adjusted): #1: (2/2);											
Cooler Security Y or N	Y or N	Sample Integrity - Documentation	Y or N								
1. Custody Seals Present:	3. COC Present:	1. Sample labels present on bottles:									
2. Custody Seals Intact:	4. Smpl Dates/Time OK	2. Container labeling complete:									
Cooler Temperature Y or	<u>N</u>	3. Sample container label / COC agree:									
1. Temp criteria achieved:		Sample Integrity - Condition	<u>Y or N</u>								
2. Cooler temp verification:		1 Sample recyd within HT:									
3. Cooler media: Ice (B	ag)	2. All containers accounted for:									
Quality Control_Preservation Y or	<u>N N/A WTB STB</u>	3. Condition of sample:	Intact								
1. Trip Blank present / cooler:		Sample Integrity - Instructions	Y or N N/A								
2. Trip Blank listed on COC:		1. Analysis requested is clear:									
3. Samples preserved properly:		2. Bottles received for unspecified tests									
4. VOCs headspace free:		3. Sufficient volume recvd for analysis:									
		4. Compositing instructions clear:									
		5. Filtering instructions clear:									
Comments		•									

TD5345: Chain of Custody Page 3 of 4



Sample Receipt Log

Page 2 of 2

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 Job #:
 TD5345
 Date / Time Received:
 6/24/2017 10:20:00 AM
 Initials:
 DS

Client: KEY ENERGY

Cooler #	Sample ID:	Vol	Bot #	Location	Pres	рН	Therm ID	Initial Temp	Therm CF	Corrected Temp	
1	TD5345-1	500ml	1	31	N/P	Note #2 - Preservative check not applicable.	IR-5	2	0	2	
1	TD5345-1	500ml	2	31	N/P	Note #2 - Preservative check not applicable.	IR-5	2	0	2	

TD5345: Chain of Custody Page 4 of 4





Section 5

General Chemistry

QC Data Summaries

Includes the following where applicable:

- Method Blank and Blank Spike Summaries
- Duplicate Summaries
- Matrix Spike Summaries



G



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TD5345

METHOD BLANK AND SPIKE RESULTS SUMMARY GENERAL CHEMISTRY

Login Number: TD5345 Account: KEYETXM - Key Energy Project: STATE S Brine Station

Analyte	Batch ID	RL	MB Result	Units	Spike Amount	BSP Result	BSP %Recov	QC Limits	
Chloride Solids, Total Dissolved	GP42969/GN82803 GN82777 GP42969/GN82803	0.50 10 0.60	0.0	mg/l mg/l	10 500	10.1 482 10.4	101.0 96.4	90-110% 88-110%	5.1
Associated Samples:	GF 425057 GN02005	0.00	0.0	ilig/ 1	10	10.4	104.0	50 1108	СЛ

Associated Samples: Batch GN82777: TD5345-1 Batch GP42969: TD5345-1 (*) Outside of QC limits



DUPLICATE RESULTS SUMMARY GENERAL CHEMISTRY

Login Number: TD5345 Account: KEYETXM - Key Energy Project: STATE S Brine Station

Analyte	Batch ID	QC Sample	Units	Original Result	DUP Result	RPD	QC Limits	
Chloride Solids, Total Dissolved Sulfate	GP42969/GN82803 GN82777 GP42969/GN82803	LA34612-1 TD5340-1 LA34612-1	mg/l mg/l mg/l	598 27400 129	622 28500 126	3.9 3.9 2.4	0-20% 0-5% 0-20%	5.2

Associated Samples: Batch GN82777: TD5345-1 Batch GP42969: TD5345-1 (*) Outside of QC limits


MATRIX SPIKE RESULTS SUMMARY GENERAL CHEMISTRY

Login Number: TD5345 Account: KEYETXM - Key Energy Project: STATE S Brine Station

Analyte	Batch ID	QC Sample	Units	Original Result	Spike Amount	MS Result	%Rec	QC Limits	
Chloride	GP42969/GN82803	LA34612-1	mg/l	598	500	1230	126.4N(a)	80-120%	5.3
Sulfate	GP42969/GN82803	LA34612-1	mg/l	129	500	593	92.8	80-120%	

Associated Samples: Batch GP42969: TD5345-1 (*) Outside of QC limits

(N) Matrix Spike Rec. outside of QC limits
 (a) Outside control limits due to matrix interference.



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Section 6

Misc. Forms

Custody Documents and Other Forms

(SGS Accutest Lafayette)

Includes the following where applicable:

• Chain of Custody

6



TD5345

CARC					~ ~	0~1		-															
JUJ ACCI	UTEST		10165 Ha	rwin Driv	re, Houst	on, TX 77	036						FED-EX	Tracking #	2				Bottle Order	Control #			
			TEL: 713	271-4700	FAX:	713-271-4	770						SGS Ad	cutest Quo	te #				SGS Accute	t Job	TD534	5	
Client / Reporting Information			Project	Informa	tion								Requested Analysis (see TEST CODE shee				neet)			Matrix Codes			
ompany Name:	Project Name:																						DW - Drinking Wa
SGS Accutest	Street		STATE	S Brine	Station								-										GW - Ground Wat WW - Water
10165 Harwin Drive	Street			Billing	nformatio	n (if diffe	ent fre	om Re	enort	to)													SW - Surface War SQ - Soil
y State Zip Houston TX 77036	City		State	Company Name									1										SL- Sludge SED-Sediment OI - Oil
oject Contact E-mail	Project #			Street Ac	ddress																		LIQ - Other Liqui AIR - Air
one # Fax # 713-271_4700	Client Purchase 0	Drder #		City			State Zip				1										SOL - Other Soli WP - Wipe FB-Field Blank		
mpler(s) Name(s) Phone	Project Manager			Attention	17																		EB-Equipment Bla RB- Rinse Blank TB-Trip Blank
			Collection	-			L	Numb	per of p	reserve	ed Bott	les											
SGS sculest				Sampled		a stand		N03	2SO4	ONE	EOH	NCORE	IA .										
Field ID / Point of Collection	MEOH/DI Vial #	Date 6/16/17	9:35:00 AM	by		• or bowes	Ĩ.	ž I X	Ϋ́	2 0	1 2		X		-		-				-	-	/
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Turnaround Time (Business days)	Approved By (SGS	Accutest PM): / Dat	e:		Commer	bata sial "A" (L	evel 1)	<u>e mio</u>	mau	NYAS	P Cate	egory A					Com	iento r op		0000113		
Std. 10 Business Days					Commer	;ial "B" (L	evel 2)	Ì		NYAS	P Cate	egory B		1								
5 Day RUSH					FULLT1	(Level 3+4	\$)		[State	Forms	5										
3 Day EMERGENCY					NJ Redu	bed			l	~	EDD Other	Forma	ut					51	DZ				
2 Day EMERGENCY					Commen	Commerc	ial "A"	= Res	sults C	Dnly	ouner				-			-					
X other Due 7/3/2017						Commerc	ial "B"	= Res	sults +	QC S	Summ	ary											
Emergency & Rush T/A data svallable VIA Lablink		Sample Cus	tody must be d	locumen	ted belo	NJ Reduce	ed = F	Result	s + QO	C Surr	poss	+ Part	ial Raw da n. incluc	ta Ing cou	rier deli	verv, P	71	5					
Relinquished by Sampler. 5. Adm to 6-2	1860	Received By: 1 58	5-TX	6	-27	7-/7	Relind 2	quishe S	d By:	5-	τ.	۲				Date Time	: : 7/	7	Received By	al	tu	N	ewna
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TD5345: Chain of Custody Page 1 of 3 SGS Accutest Lafayette



SGS

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Date / Tim CS Job Client Proje Deliverab TA	e: 6/26/2017 5:08:57 PM R: LONGN #: TD5345 ct: STATE S Brine Station le: COMMB T: Due 7/3/2017		Sub Lab: Accutest Gulf C Address: 500 Ambassad City: Scott State: LA Contact: Sample Receiv Phone: 800-304-5227	Coast Louisian or Caffery Prk Zip: ing	na way 70583		
SGS Accutest Sample #	Client Sample Description	Analysis	Location	Sampled By	Date Sampled	Time Sampled	Aliquot
<u>TD5345-1</u>	FRESH WATER WELL	<u>NA .</u>	<u>3I ,</u>		6/16/2017	<u>9:35:00 AM</u>	
Comment	S:						
Sample Mana	gement Receipt:		Date:				
oumpio mana	gonnonie i teoropia						
			Ϋ́.	d .			
			250 ml	nitric	322		

TD5345: Chain of Custody Page 2 of 3 6.1



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SGS Accutest Sample Receipt Summary

Job Number: TD5	345	Client: SGS		Project: STATE S BI	RINE STATION		
Date / Time Received: 6/27	/2017 10:20:00	DAM Delivery	Method: Acc	cutest Courier Airbill #'s:			
Cooler Temps (Initial/Adjuste	ed): <u>#1:(1.3/1</u>	.3);					
Cooler Security Y 1. Custody Seals Present: Image: Cooler Temperature	<u>or N</u> <u> </u>	3. COC Present: Smpl Dates/Time OK	Y or N ✓ □ ✓ □	Sample Integrity - Documentation 1. Sample labels present on bottles: 2. Container labeling complete: 3. Sample container label / COC agree:	Yor V V	<u>N</u>	
1. Temp criteria achieved: 2. Thermometer ID: 3. Cooler media: 4. No. Coolers:	; Ice (direct con	tact)		Sample Integrity - Condition 1. Sample recvd within HT: 2. All containers accounted for: 3. Condition of sample:	<u>Yor</u> ✓ ✓		
Quality Control Preservation	<u>Y or N</u>	N/A		Sample Integrity - Instructions	Y or	N	N/A
 Trip Blank present / cooler: Trip Blank listed on COC: 				 Analysis requested is clear: Bottles received for unspecified tests 			
 Samples preserved properly: VOCs headspace free: 				 Sufficient volume recvd for analysis: Compositing instructions clear: Eithering instructions clear: 			
Comments							

TD5345: Chain of Custody Page 3 of 3 6.1





Section 7

Metals Analysis

QC Data Summaries

(SGS Accutest Lafayette)

Includes the following where applicable:

- Method Blank Summaries
- Matrix Spike and Duplicate Summaries
- Blank Spike and Lab Control Sample Summaries
- Serial Dilution Summaries



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TD5345

QC Batch ID: MP8370 Matrix Type: AQUEOUS Methods: SW846 6010B Units: ug/l

Prep Date:					06/27/17
Metal	RL	IDL	MDL	MB raw	final
Aluminum	100	14	46		
Antimony	6.0	1.4	3.7		
Arsenic	10	1.9	2.6		
Barium	10	.21	1.3		
Beryllium	4.0	.05	.3		
Boron	100	.95	10		
Cadmium	5.0	.13	.9		
Calcium	100	5.1	58		
Chromium	10	.29	.9		
Cobalt	10	.15	.8		
Copper	10	.43	4		
Iron	100	2.8	33		
Lead	10	.9	1.8		
Lithium	10	1.1	6.3		
Magnesium	100	18	37		
Manganese	10	.05	1.1		
Molybdenum	10	.15	1.1		
Nickel	10	.3	1		
Potassium	500	25	50		
Selenium	10	1.7	3.6		
Silver	10	.32	1.4		
Sodium	500	6.5	53	-19	<500
Strontium	10	.09	1		
Thallium	5.0	1.3	1.6		
Tin	10	.76	.9		
Titanium	10	.46	1.7		
Vanadium	10	.33	.9		
Zinc	20	.63	4.3		

Associated samples MP8370: TD5345-1

Results < IDL are shown as zero for calculation purposes (*) Outside of QC limits (anr) Analyte not requested



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QC Batch ID: MP8370 Matrix Type: AQUEOUS Methods: SW846 6010B Units: ug/l

Prep Date:			06/27/17					
Metal	TD5377-1A Original MS	Spikelot ICPSPIKE	: 1% Rec	QC Limits				
Aluminum	anr							
Antimony								
Arsenic								
Barium								
Beryllium								
Boron								
Cadmium								
Calcium								
Chromium								
Cobalt								
Copper								
Iron								
Lead								
Lithium								
Magnesium	anr							
Manganese								
Molybdenum								
Nickel								
Potassium								
Selenium								
Silver								
Sodium	2980000 2980000	10000	0.0 (a)	75-125				
Strontium								
Thallium								
Tin								
Titanium								
Vanadium								
Zinc	anr							
Associated sam	nples MP8370: TD534	5-1						
<pre>Results < IDL are shown as zero for calculation purposes (*) Outside of QC limits (N) Matrix Spike Rec. outside of QC limits (anr) Analyte not requested (a) Spike amount low relative to the sample amount. Refer to lab control or spike blank for recovery information.</pre>								



QC Batch ID: MP8370 Matrix Type: AQUEOUS Methods: SW846 6010B Units: ug/l

Prep Date:				06/27/17			
Metal	TD5377-1A Original MSD	Spikelot ICPSPIKE1% Re	ec	MSD RPD	QC Limit		
Aluminum	anr						
Antimony							
Arsenic							
Barium							
Beryllium							
Boron							
Cadmium							
Calcium							
Chromium							
Cobalt							
Copper							
Iron							
Lead							
Lithium							
Magnesium	anr						
Manganese							
Molybdenum							
Nickel							
Potassium							
Selenium							
Silver							
Sodium	2980000 3070000	10000 900	.0(a)	3.0	20		
Strontium							
Thallium							
Tin							
Titanium							
Vanadium							
Zinc	anr						
Associated sam	nples MP8370: TD534	5-1					
<pre>Results < IDL are shown as zero for calculation purposes (*) Outside of QC limits (N) Matrix Spike Rec. outside of QC limits (anr) Analyte not requested (a) Spike amount low relative to the sample amount. Refer to lab control or spike blank for recovery information.</pre>							





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QC Batch ID: MP8370 Matrix Type: AQUEOUS Methods: SW846 6010B Units: ug/l

Prep Date:			06/27/17						
Metal	BSP Result	Spikelot ICPSPIKE	1% Rec	QC Limits					
Aluminum	anr								
Antimony									
Arsenic									
Barium									
Beryllium									
Boron									
Cadmium									
Calcium									
Chromium									
Cobalt									
Copper									
Iron									
Lead									
Lithium									
Magnesium	anr								
Manganese									
Molybdenum									
Nickel									
Potassium									
Selenium									
Silver									
Sodium	10400	10000	104.0	80-120					
Strontium									
Thallium									
Tin									
Titanium									
Vanadium									
Zinc	anr								
Associated sar	nples MP83	70: TD534	5-1						
Results < IDL (*) Outside of (anr) Analyte	Results < IDL are shown as zero for calculation purposes (*) Outside of QC limits (anr) Analyte not requested								

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SERIAL DILUTION RESULTS SUMMARY

Login Number: TD5345 Account: ALGC - SGS Accutest Gulf Coast Project: KEYETXM: STATE S Brine Station

QC Batch ID: MP8370 Matrix Type: AQUEOUS Methods: SW846 6010B Units: ug/l

Prep Date:			06/27/17					
Metal	TD5377-12 Original	A SDL 5:25	%DIF	QC Limits				
Aluminum	anr							
Antimony								
Arsenic								
Barium								
Beryllium								
Boron								
Cadmium								
Calcium								
Chromium								
Cobalt								
Copper								
Iron								
Lead								
Lithium								
Magnesium	anr							
Manganese								
Molybdenum								
Nickel								
Potassium								
Selenium								
Silver								
Sodium	2980000	3920000	31.5*(a)	0-10				
Strontium								
Thallium								
Tin								
Titanium								
Vanadium								
Zinc	anr							
Associated sam	ples MP83	70: TD534	5-1					
Results < IDL (*) Outside of (anr) Analyte (a) Serial dil	Results < IDL are shown as zero for calculation purposes (*) Outside of QC limits (anr) Analyte not requested (a) Serial dilution indicates possible matrix interference.							





ACCUTEST Gulf Coast

SGS ACCUTEST IS PART OF SGS, THE WORLD'S LEADING INSPECTION, VERIFICATION, TESTING AND CERTIFICATION COMPANY.

07/25/17

e-Hardcopy 2.0 Automated Report

SG

Technical Report for

Key Energy

Key State S

SGS Accutest Job Number: TD6530



Sampling Date: 07/13/17

Report to:

Key Energy 12400 W 120 E Odessa, TX 79765 mcoligan@keyenergy.com; bdinwiddie@keyenergy.com

ATTN: Ana Ramirez

Total number of pages in report: 29





Test results contained within this data package meet the requirements of the National Environmental Laboratory Accreditation Program and/or state specific certification programs as applicable.

Client Service contact: Electa Brown 713-271-4700

Certifications: TX (T104704220-17-27) AR (14-016-0) AZ (AZ0769) FL (E87628) KS (E-10366) LA (85695/04004) NJ (TX010) OK (2016-170) VA (8999)

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7.1: Prep QC MP8603: Na	25



Sample Summary

Key Energy

Key State S

Job No: TD6530

Sample Number	Collected Date	Time By	Received	Matr Code	ix Type	Client Sample ID
TD6530-1	07/13/17	14:00	07/20/17	AQ	Water	FWT
TD6530-1A	07/13/17	14:00	07/20/17	AQ	Water	FWT
TD6530-2	07/13/17	13:30	07/20/17	AQ	Water	BWW
TD6530-2A	07/13/17	13:30	07/20/17	AQ	Water	BWW

Summary of Hits

Job Number:	TD6530
Account:	Key Energy
Project:	Key State S
Collected:	07/13/17

Lab Sample ID Analyte	Client Sample ID	Result/ Qual	RL	MDL	Units	Method
TD6530-1	FWT					
Chloride Solids, Total Diss	solved	616 1180	25 10		mg/l mg/l	EPA 300 SM 2540C-2011
TD6530-1A	FWT					
Sodium ^a		274000	500		ug/l	SW846 6010C
TD6530-2	BWW					
Chloride Solids, Total Diss	solved	32400 41500	2500 1000		mg/l mg/l	EPA 300 SM 2540C-2011
TD6530-2A	BWW					
Sodium ^a		11400000	25000		ug/l	SW846 6010C

(a) Analysis performed at SGS Accutest, Lafayette, LA.

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Section 3 😡

Sample Results

Report of Analysis



Report of Analysis

Client Sample ID: Lab Sample ID: Matrix:	FWT TD6530- AQ - Wat	l er				Date Sampled Date Received Percent Solids	: 07 : 07 : n/a	/13/17 /20/17 a
Project:	Key State	S						
General Chemistry	7							
Analyte		Result	RL	Units	DF	Analyzed	By	Method
Chloride Solids, Total Dissol	ved	616 1180	25 10	mg/l mg/l	50 1	07/20/17 15:50 07/20/17	ES BG	EPA 300 SM 2540C-2011

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3. 3



		Report of Analysis													
Client Sample I Lab Sample ID Matrix:	D: FWT : TD653 AQ - Y	30-1A Water						Date Sampled: Date Received: Percent Solids:	07/13/17 07/20/17 n/a						
Project:	Key S	tate S						i er cent bonust	ii) u						
Total Metals A	nalysis														
Analyte	Result	RL	Units	DF	Prep	Analyzed	By	Method	Prep Me	thod					
Sodium ^a	274000	500	ug/l	1	07/21/17	07/24/17	ALA	SW846 6010C ¹	SW846 301	0A ²					

(1) Instrument QC Batch: L:MA8505
 (2) Prep QC Batch: L:MP8603

(a) Analysis performed at SGS Accutest, Lafayette, LA.

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SGS

Report of Analysis

Client Sample ID: Lab Sample ID: Matrix:	BWW TD6530-2 AQ - Wat	2 ter				Date Sampled Date Received Percent Solids	: 07 : 07 : n/a	/13/17 /20/17 a
Project:	Key State	S						
General Chemistry	7							
Analyte		Result	RL	Units	DF	Analyzed	By	Method
Chloride Solids, Total Dissol	ved	32400 41500	2500 1000	mg/l mg/l	5000 1	07/20/17 16:37 07/20/17	ES BG	EPA 300 SM 2540C-2011

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Report	of	Analysis

Client Sampl Lab Sample 1	e ID: BWW ID: TD653	0-2A					Date Sampled:	07/13/17
Matrix:	AQ - W	ater					Date Received: Percent Solids:	07/20/17 n/a
Project:	Key Sta	ate S						
Total Metals	Analysis							
Analyte	Result	RL	Units	DF	Prep	Analyzed B	By Method	Prep Method
Sodium ^a	11400000	25000	ug/l	50	07/21/17	07/24/17 A	LA SW846 6010C ¹	SW846 3010A ²

(1) Instrument QC Batch: L:MA8505
 (2) Prep QC Batch: L:MP8603

(a) Analysis performed at SGS Accutest, Lafayette, LA.

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Section 4

Misc. Forms

Custody Documents and Other Forms

Includes the following where applicable:

• Chain of Custody





TD6530: Chain of Custody Page 1 of 5



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TD6530: Chain of Custody Page 2 of 5



SGS Accutest Sample Receipt Summary

Page 1 of 3

4.1 **4**

Date / Time Received:	Job Number: TD6530			KG I		Project: KEY STATES	Project: KEY STATE S								
			Delivery I	Method	:	Airbill #'s: 1Z6569E801453	93071								
No. Coolers: 1	Therm ID): IR9;				Temp Adjustment Factor:	D;								
Cooler Temps (Initial/Adjusted	l): <u>#1:(3</u> /	/3);													
Cooler Security Y	or N			<u>Y</u> c	or N	Sample Integrity - Documentation	Y	or	N						
1. Custody Seals Present:		3. COC I	Present:			1. Sample labels present on bottles:	\checkmark								
2. Custody Seals Intact:		4. Smpl Dat	tes/Time OK	\checkmark		2. Container labeling complete:	\checkmark								
Cooler Temperature	<u>Y or</u>	N				3. Sample container label / COC agree:	\checkmark								
1. Temp criteria achieved:	\checkmark					Sample Integrity - Condition	Y	or	N						
2. Cooler temp verification:			-			1. Sample recvd within HT:			\checkmark						
3. Cooler media:	Ice Pack	(Blue)	_			2. All containers accounted for:	\checkmark								
Quality Control_Preservation	<u>Y or</u>	<u>N N/</u>	<u>A</u>	WTB	STB	3. Condition of sample:		Intac	t						
1. Trip Blank present / cooler:]			Sample Integrity - Instructions	Y	or	N	N/A					
2. Trip Blank listed on COC:]			1. Analysis requested is clear:									
3. Samples preserved properly:	\checkmark					2. Bottles received for unspecified tests									
4. VOCs headspace free:]			3. Sufficient volume recvd for analysis:	\checkmark								
						4. Compositing instructions clear:									
						5. Filtering instructions clear:									

TD6530: Chain of Custody Page 3 of 5



Accutest Job Number: TD6530

CSR:

Response:

Response Date: _____

TD6530: Chain of Custody Page 4 of 5

Page 2 of 3



Sample Receipt Log

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4

Job #: TD6530

Date / Time Received: 7/20/2017 10:30:00 AM

Initials: BG

Client: KEY ENERGY

Cooler #	Sample ID:	Vol	Bot #	Location	Pres	рН	Therm ID	Initial Temp	Therm CF	Corrected Temp
1	TD6530-1	500ml	1	3P	N/P	Note #2 - Preservative check not applicable.	IR9	3	0	3
1	TD6530-1	125ML	2	1FF	H2SO4	pH < 2	IR9	3	0	3
1	TD6530-1	125ML	3	SUB	HNO3	pH < 2	IR9	3	0	3
1	TD6530-2	500ml	1	3P	N/P	Note #2 - Preservative check not applicable.	IR9	3	0	3
1	TD6530-2	125ML	2	1FF	H2SO4	pH < 2	IR9	3	0	3
1	TD6530-2	125ML	3	SUB	HNO3	pH < 2	IR9	3	0	3

TD6530: Chain of Custody Page 5 of 5







Section 5

General Chemistry

QC Data Summaries

Includes the following where applicable:

- Method Blank and Blank Spike Summaries
- Duplicate Summaries
- Matrix Spike Summaries



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TD6530

METHOD BLANK AND SPIKE RESULTS SUMMARY GENERAL CHEMISTRY

Login Number: TD6530 Account: KEYENTXO - Key Energy Project: Key State S

Analyte	Batch ID	RL	MB Result	Units	Spike Amount	BSP Result	BSP %Recov	QC Limits	
Bromide Chloride Eluoride	GP43317/GN83336 GP43317/GN83336 GP43317/GN83336	0.50	0.0	mg/l mg/l	10 10 10	10.3 10.2 10.4	103.0 102.0	90-110% 90-110% 90-110%	5.1
Nitrogen, Nitrate Solids, Total Dissolved Sulfate	GP43317/GN83336 GN83331 GP43317/GN83336	0.50 10 0.60	0.0 0.0 0.0	mg/l mg/l mg/l	10 500 10	9.99 492 10.4	99.9 98.4 104.0	90-110% 88-110% 90-110%	СЛ

Associated Samples: Batch GN83331: TD6530-1, TD6530-2 Batch GP43317: TD6530-1, TD6530-2 (*) Outside of QC limits



DUPLICATE RESULTS SUMMARY GENERAL CHEMISTRY

Login Number: TD6530 Account: KEYENTXO - Key Energy Project: Key State S

Analyte	Batch ID	QC Sample	Units	Original Result	DUP Result	RPD	QC Limits	
Bromide	GP43317/GN83336	TD6509-1	mg/l	0.0	0.0	0.0	0-20%	ហ
Fluoride	GP43317/GN83336 GP43317/GN83336	TD6509-1	mg/l	0.38	0.36	5.4	0-20%	N
Nitrogen, Nitrate Solids, Total Dissolved	GP43317/GN83336 GN83331 GP43217/GN82226	TD6509-1 TD6562-1	mg/l mg/l	1.7 1830 22.1	1840	0.0	0-20%	ъ
Suitace	GF4331//GN83330	100509-1	mg/1	23.1	21.7	0.5	0-20%	

Associated Samples: Batch GN83331: TD6530-1, TD6530-2 Batch GP43317: TD6530-1, TD6530-2 (*) Outside of QC limits



MATRIX SPIKE RESULTS SUMMARY GENERAL CHEMISTRY

Login Number: TD6530 Account: KEYENTXO - Key Energy Project: Key State S

Analyte	Batch ID	QC Sample	Units	Original Result	Spike Amount	MS Result	%Rec	QC Limits	
Bromide	GP43317/GN83336	TD6509-1	mg/l	0.0	10	11.0	110.0	80-120%	СЛ
Chloride	GP43317/GN83336	TD6509-1	mg/l	13.4	20	34.4	105.0	80-120%	ώ
Fluoride	GP43317/GN83336	TD6509-1	mg/l	0.38	10	13.0	126.2N(a)	80-120%	
Nitrogen, Nitrate	GP43317/GN83336	TD6509-1	mg/l	1.7	10	12.1	104.0	80-120%	
Sulfate	GP43317/GN83336	TD6509-1	mg/l	23.1	20	43.7	103.0	80-120%	5

Associated Samples: Batch GP43317: TD6530-1, TD6530-2 (*) Outside of QC limits (N) Matrix Spike Rec. outside of QC limits (a) Outside control limits due to matrix interference.





Section 6

Misc. Forms

Custody Documents and Other Forms

(SGS Accutest Lafayette)

Includes the following where applicable:

• Chain of Custody

6



	133A GELC	ITEST		10165 11-	nuin Driv	House	w TX 77	036					FEDE	XTracking	9				Bottle Ord	ler Control #	1		
	NOUL AND MALE MADE	A 18 mil 1		TEL 713-	271-4700	FAX	713-271-4	770					SGSIA	obutest Gas	olin 15				SGS Aco	dol, fest	TD6	530	1
	Client / Reporting Information	1		Project I	nforma	tion					-			Req	uested	Analys	is (see	TEST	CODE	sheet)	1	1	Matrix Code
ompan.	y Name:	Project Name:													-	1.1							DW - Drinking Wa
SGS	Accutest	Streat		Ke	ey State	5	_	-					- 1							- 13			GW - Ground Wa WW - Water
1016	55 Harwin Drive				Billing In	formatio	n (if differ	ent fro	m Rép	(of the												1	SW - Surface Wa SO - Sol
Sity Hou	State Zp ston TX 77036	City		State	Company	Name																	SL- Sludge SED-Sedimen OI - Oil
long.	Contact E-mail nocvin02@sqs.com	Project #			Street Ad	0/055								8							111		AIR - Air
hone #	FaxS	Client Purchase O	incher #		City	-		St	tan⊧	_	24	p			1						H.		WP - Wipe
713	271-4700		1.1					_			_		- 1		4								FB-Field Blank EB-Equipment SI
Sampler	(s) Name(s) Phone	Project Manager			Allenson																		RB- Rinse Blan T8-Trip Blank
-		1 1		Collection		1			Number	of prese	rved Bo	ittes	3 1			10							
SOS Accuters Sumple F	Field ID / Point of Collection		Date	Time	Sampled by	Mairix	V of bottles	HCI	toni	H2504 NONE	IN Water	ENCORE	MA		_				_				LAB USE ON
1A	FWT		7/13/17	2:00:00 PM	12.14	AQ	1		x				X	1			1						_ i _
2A	BWW		7/13/17	1:30:00 PM		AQ	1		x				X				1.1		_				
-														1			11					100	
-		· · · · · · · · · · · · · · · · · · ·				1	1			1.1					1	1							
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-		1		-		-		Ħ		-		Ħ		1		1				1	1	1.0	1
-	Turneround Time (Business days)			-		-	Data	Delive	erable I	Informa	ation	1.1	1	1	-	-	-	Con	iments /	Special In	struction	s	1
		Approved By (SGS	Accutest PM): / Dat	lez .		Commer	cial "A" (L	evel 1)	2		NYA	SP Cat	egory A							-	1.1		1
	Std. 10 Business Days	1				FULLTI	Level 34	evel 2) 4)		1	State	e Formi	s gory B		1					-	54	K	
	3 Day EMERGENCY					NJ Redu	ced				EDD	Forma	4	-				1	1995-10	RC	1.7		1
	2 Day EMERGENCY					Comman	cial "C"		1.	X	Othe	r COI	MMB	-	41		-	λI	P6 6	13	a d		
	1 Day EMERGENCY						Commen	Call "A"	= Resu	its Only	Sum	raw.	- 1										
Env	ergency & Rush T/A data available VIA Lablink	1	-		100		NJ Redu	oed = R	Results -	OC S	mman	y + Part	al Raw	Sata	1		-		-	-	1	4	
Relia	equished by Sampler:	1800	Sample Cus Received By:	stody must be d	ocumen	ted belo	w each ti	Reing	mples puished	chang By:	e pos	Sessie	in, inclu	iding col	uner del	Date Te	ne:		Rectives	By. 0	1		-
1	1 Stames 7	20-17	1 565	5-1-1	7	- 21	-17	2 -	56	5-1	TX	-		-		7-	20-	17	2/10	chr	23	Her	alie
Rafy	automotive Sampler W al net - Date To	1017	Roceived By	ulun.	X	d		Reling 4	luished	By:				1.2		Date Tu	ne:		Received 4	d By:			
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5		+	5			_		103	par	_		-	Notin	Lact		- U	-		-			411	10 7 31

TD6530: Chain of Custody Page 1 of 3 SGS Accutest Lafayette 6.1

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TD6530: Chain of Custody Page 2 of 3



SGS Accutest Sample Receipt Summary

Job Number: T	D6530	Client:	SGS		Project: KEY STATE S			
Date / Time Received: 7/	/21/2017 10:15:0	0 AM	Delivery Method:	Accutest Courier	Airbill #'s:			
Cooler Temps (Initial/Adju	sted): <u>#1: (1.1/</u>	1.1);						
Cooler Security 1. Custody Seals Present: 2. Custody Seals Intact:	Y or N ✓ □ ✓ □ 4.5	3. COC Pr Smpl Date	esent: ✓ s/Time OK ✓	N Sample Integrit 1. Sample labels 2. Container labe	ty - Documentation present on bottles: aling complete: ner label / COC agree:	Y ♥ ♥	<u>or N</u>	
1. Temp criteria achieved: 2. Thermometer ID: 3. Cooler media: 4. No. Coolers:	Y Or N ✓ □ DV439; Ice (direct cor 1	ntact)		Sample Integri 1. Sample recvd 2. All containers 3. Condition of sa	i ty - Condition within HT: accounted for: ample:	⊻ ⊻ ⊻	or N	
Quality Control Preservat	ion <u>YorN</u>	N/A		Sample Integri	ity - Instructions	Y	or N	 N/A
 Trip Blank present / cooler: Trip Blank listed on COC: Samples preserved preserved 		✓ ✓		1. Analysis requ 2. Bottles receiv	ested is clear: ed for unspecified tests			
 Samples preserved proper VOCs headspace free: 	ıy. ☑ []			 Sufficient volu Compositing i Eiltering instru 	ume recvd for analysis: instructions clear: uctions clear:			Y
Comments								

TD6530: Chain of Custody Page 3 of 3

SGS ACCUTEST TD6530

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Section 7

Metals Analysis

QC Data Summaries

(SGS Accutest Lafayette)

Includes the following where applicable:

- Method Blank Summaries
- Matrix Spike and Duplicate Summaries
- Blank Spike and Lab Control Sample Summaries
- Serial Dilution Summaries



Login Number: TD6530 Account: ALGC - SGS Accutest Gulf Coast Project: KEYENTXO: Key State S

QC Batch ID: MP8603 Matrix Type: AQUEOUS Methods: SW846 6010C Units: ug/l

MB Metal RI, IDI, MDI, raw final
Incour nu ibu nuu iaw lilldi
Aluminum 100 14 46
Antimony 6.0 1.4 3.7
Arsenic 10 1.9 2.6
Barium 10 .21 1.3
Beryllium 4.0 .05 .3
Boron 100 .95 10
Cadmium 5.0 .13 .9
Calcium 100 5.1 58
Chromium 10 .29 .9
Cobalt 10 .15 .8
Copper 10 .43 4
Iron 100 2.8 33
Lead 10 .9 1.8
Lithium 10 1.1 6.3
Magnesium 100 18 37
Manganese 10 .05 1.1
Molybdenum 10 .15 1.1
Nickel 10 .3 1
Potassium 500 25 50
Selenium 10 1.7 3.6
Silver 10 .32 1.4
Sodium 500 6.5 53 -8.9 <500
Strontium 10 .09 1
Thallium 5.0 1.3 1.6
Tin 10 .76 .9
Titanium 10 .46 1.7
Vanadium 10 .33 .9
Zinc 20 .63 4.3

Associated samples MP8603: TD6530-1A, TD6530-2A

Results < IDL are shown as zero for calculation purposes (*) Outside of QC limits (anr) Analyte not requested



25 of 29

TD6530
Login Number: TD6530 Account: ALGC - SGS Accutest Gulf Coast Project: KEYENTXO: Key State S

QC Batch ID: MP8603 Matrix Type: AQUEOUS Methods: SW846 6010C Units: ug/l

Prep Date:			07/21/17	
Metal	TD6473-5 Original MS	Spikelot ICPSPIKE	: 1% Rec	QC Limits
Aluminum				
Antimony	anr			
Arsenic	anr			
Barium	anr			
Beryllium	anr			
Boron				
Cadmium	anr			
Calcium				
Chromium	anr			
Cobalt	anr			
Copper				
Iron				
Lead	anr			
Lithium				
Magnesium				
Manganese				
Molybdenum				
Nickel	anr			
Potassium				
Selenium	anr			
Silver	anr			
Sodium	902000 891000	10000	-110.0(a	75-125
Strontium				
Thallium				
Tin				
Titanium				
Vanadium	anr			
Zinc	anr			
Associated sam	mples MP8603: TD653	80-1A, TD6	5530-2A	
Results < IDL (*) Outside of (N) Matrix Spi (anr) Analyte (a) Spike amou informatic	are shown as zero QC limits ke Rec. outside of not requested unt low relative to on.	for calcu QC limit the samp	lation pu s le amount	rposes . Refer to lab control or spike blank for recovery



Login Number: TD6530 Account: ALGC - SGS Accutest Gulf Coast Project: KEYENTXO: Key State S

QC Batch ID: MP8603 Matrix Type: AQUEOUS Methods: SW846 6010C Units: ug/l

Prep Date:				07/21/17	
Metal	TD6473-5 Original MSD	Spikelot ICPSPIKI	: El% Rec	MSD RPD	QC Limit
Aluminum					
Antimony	anr				
Arsenic	anr				
Barium	anr				
Beryllium	anr				
Boron					
Cadmium	anr				
Calcium					
Chromium	anr				
Cobalt	anr				
Copper					
Iron					
Lead	anr				
Lithium					
Magnesium					
Manganese					
Molybdenum					
Nickel	anr				
Potassium					
Selenium	anr				
Silver	anr				
Sodium	902000 8720	00 10000	-300.0(a	2.2	20
Strontium					
Thallium					
Tin					
Titanium					
Vanadium	anr				
Zinc	anr				
Associated sam	nples MP8603: I	D6530-1A, TD6	5530-2A		
Results < IDL (*) Outside of (N) Matrix Spi (anr) Analyte (a) Spike amou informatic	are shown as z QC limits ke Rec. outsid not requested ant low relativ on.	ero for calcu e of QC limit e to the samp	ulation pu ts ple amount	rposes . Refer	to lab control or spike blank for recovery



SPIKE BLANK AND LAB CONTROL SAMPLE SUMMARY

Login Number: TD6530 Account: ALGC - SGS Accutest Gulf Coast Project: KEYENTXO: Key State S

QC Batch ID: MP8603 Matrix Type: AQUEOUS Methods: SW846 6010C Units: ug/l

Prep Date:			07/21/17	1
Metal	BSP Result	Spikelot ICPSPIKE1	l% Rec	QC Limits
Aluminum				
Antimony	anr			
Arsenic	anr			
Barium	anr			
Beryllium	anr			
Boron				
Cadmium	anr			
Calcium				
Chromium	anr			
Cobalt	anr			
Copper				
Iron				
Lead	anr			
Lithium				
Magnesium				
Manganese				
Molybdenum				
Nickel	anr			
Potassium				
Silver	anr			
Sodium	9560	10000	95.6	80-120
Strontium				
Thallium				
Tin				
Titanium				
Vanadium	anr			
Zinc	anr			
Associated sam	mples MP86	603: TD6530)-1A, TD6	530-2A

Results < IDL are shown as zero for calculation purposes (*) Outside of QC limits (anr) Analyte not requested



SERIAL DILUTION RESULTS SUMMARY

Login Number: TD6530 Account: ALGC - SGS Accutest Gulf Coast Project: KEYENTXO: Key State S

QC Batch ID: MP8603 Matrix Type: AQUEOUS Methods: SW846 6010C Units: ug/l

Prep Date:			07/21/17	
Metal	TD6473-5 Original	SDL 1:5	%DIF	QC Limits
Aluminum				
Antimony	anr			
Arsenic	anr			
Barium	anr			
Beryllium	anr			
Boron				
Cadmium	anr			
Calcium				
Chromium	anr			
Cobalt	anr			
Copper				
Iron				
Lead	anr			
Lithium				
Magnesium				
Manganese				
Molybdenum				
Nickel	anr			
Potassium				
Selenium	anr			
Silver	anr			
Sodium	902000	1130000	25.6*(a)	0-10
Strontium				
Thallium				
Tin				
Titanium				
Vanadium	anr			
Zinc	anr			
Associated sar	mples MP86	03: TD653	0-1A, TD6	530-2A
Results < IDL (*) Outside of (anr) Analyte (a) Serial di	are shown E QC limit not reque lution ind	as zero s sted icates po	for calcu ssible ma	lation purposes trix interference.

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ACCUTEST

Gulf Coast

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e-Hardcopy 2.0 Automated Report

Technical Report for

Key Energy

State# 1 Brine Station

SGS Accutest Job Number: TD11627



Sampling Date: 10/24/17

Report to:

Key Energy 6 Desota Drvie Suite 4300 Midland, TX 79705 bdinwiddie@keyenergy.com; Clair.Gonzales@tetratech.com

ATTN: Blake Dinwiddie

Total number of pages in report: 33





Test results contained within this data package meet the requirements of the National Environmental Laboratory Accreditation Program and/or state specific certification programs as applicable.

Client Service contact: Electa Brown 713-271-4700

Certifications: TX (T104704220-17-27) AR (14-016-0) AZ (AZ0769) FL (E87628) KS (E-10366) LA (85695/04004) NJ (TX010) OK (2017-002) VA (8999)

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Sample Summary

Key Energy

Job No: TD11627

State# 1 Brine Station

Sample	Collected			Matr	ix	Client
Number	Date	Time By	Received	Code	Туре	Sample ID
TD11627-1	10/24/17	00:00	11/01/17	AQ	Water	FRESH WATER
TD11627-2	10/24/17	00:00	11/01/17	AQ	Water	BRINE WATER WELL

Summary of Hits

Job Number:	TD11627
Account:	Key Energy
Project:	State# 1 Brine Station
Collected:	10/24/17

Lab Sample ID Clier Analyte	nt Sample ID	Result/ Qual	RL	MDL	Units	Method
TD11627-1 FRE	SH WATER					
Sodium ^a Chloride Density ^b Solids, Total Dissolved ^c Specific Conductivity pH ^d		363000 606 1.0 1520 2510 7.66	500 50 20 1.0		ug/l mg/l g/ml mg/l umhos/cm su	SW846 6010C EPA 300.0 ASTM DEF SM 2540C-2011 EPA 120.1 SM 4500H+ B-2011
TD11627-2 BRI	NE WATER V	WELL				
Sodium ^a Chloride Density ^b Solids, Total Dissolved	l c	55400000 177000 1.2 260000	250000 5000		ug/l mg/l g/ml mg/l	SW846 6010C EPA 300.0 ASTM DEF SM 2540C-2011

1.0

umhos/cm EPA 120.1

su

SM 4500H+ B-2011

(a) Analysis performed at SGS Accutest, Lafayette, LA.

(b) Analysis performed at SGS Accutest, Dayton, NJ.

(c) Sample received outside the holding time.

Specific Conductivity

pH e

(d) Field analysis required. Received out of hold time and analyzed by request. temp. 21.2 c

312000

6.79

(e) Field analysis required. Received out of hold time and analyzed by request. temp. 21.4 c



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Section 3 😡

Sample Results

Report of Analysis



SGS Accutest

				Rep	ort of A	nalysis		Page 1 of
Client Sample I Lab Sample ID Matrix:	ID: FRES : TD110 AQ - `	H WATE 527-1 Water	ER				Date Sampled: Date Received: Percent Solids:	10/24/17 11/01/17 n/a
Total Metals A	nalysis	1 Brine	Station					
Analyte	Result	RL	Units	DF	Prep	Analyzed By	Method	Prep Method
Sodium ^a	363000	500	ug/l	1	11/07/17	11/07/17 AL	A SW846 6010C ¹	SW846 3010A ²

(1) Instrument QC Batch: L:MA9765

(2) Prep QC Batch: L:MP9713

(a) Analysis performed at SGS Accutest, Lafayette, LA.

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SGS Accutest

		Report of Analysis			Page 1 of 1	3.1 3.1
Client Sample ID: Lab Sample ID:	FRESH WATER TD11627-1		Date Sampled:	10/24/17		ယ
Matrix:	AQ - Water		Date Received: Percent Solids:	11/01/17 n/a		
Project:	State# 1 Brine Station					

Report of Analysis

General Chemistry

Analyte	Result	RL	Units	DF	Analyzed	By	Method
Chloride	606	50	mg/l	100	11/06/17 13:24	SM	EPA 300.0
Density ^a	1.0		g/ml	1	11/17/17 11:00	ANJ	ASTM DEF
Solids, Total Dissolved ^b	1520	20	mg/l	1	11/02/17	BG	SM 2540C-2011
Specific Conductivity	2510	1.0	umhos/cm	1	11/02/17 15:00	PA	EPA 120.1
pH °	7.66		su	1	11/02/17 14:50	PA	SM 4500H+ B-2011

(a) Analysis performed at SGS Accutest, Dayton, NJ.

(b) Sample received outside the holding time.

(c) Field analysis required. Received out of hold time and analyzed by request. temp. 21.2 c



Client Sample I Lab Sample ID Matrix: Project:	ID: BRINE TD116 AQ - V State#	WATER 27-2 Vater I Brine St	10/24/17 11/01/17 n/a							
Total Metals Analysis										
Analyte	Result	RL	Units	DF	Prep	Analyzed By	Method	Prep Method		
Sodium ^a	55400000	250000	ug/l	500	11/07/17	11/08/17 AL	A SW846 6010C ¹	SW846 3010A ²		

Report of Analysis

(1) Instrument QC Batch: L:MA9769

(2) Prep QC Batch: L:MP9713

(a) Analysis performed at SGS Accutest, Lafayette, LA.

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3.2

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SGS Accutest

				-
Client Sample ID:	BRINE WATER WELL			
Lab Sample ID:	TD11627-2	Date Sampled:	10/24/17	
Matrix:	AQ - Water	Date Received:	11/01/17	
		Percent Solids:	n/a	
Project:	State# 1 Brine Station			
General Chemistry	,			_

Report of Analysis

Analyte	Result	RL	Units	DF	Analyzed	By	Method
Chloride	177000	5000	mg/l	10000	11/06/17 15:48	SM	EPA 300.0
Density ^a	1.2		g/ml	1	11/17/17 11:00	ANJ	ASTM DEF
Solids, Total Dissolved ^b	260000	1000	mg/l	1	11/03/17	BG	SM 2540C-2011
Specific Conductivity	312000	1.0	umhos/cm	1	11/02/17 15:00	PA	EPA 120.1
pH ^c	6.79		su	1	11/02/17 14:50	PA	SM 4500H+ B-2011

(a) Analysis performed at SGS Accutest, Dayton, NJ.

(b) Sample received outside the holding time.

(c) Field analysis required. Received out of hold time and analyzed by request. temp. 21.4 c

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3.2





Section 4

Misc. Forms

Custody Documents and Other Forms

Includes the following where applicable:

• Chain of Custody



t Name: ct Name;	Key Frank						Tel	(432) 68 (432) 68	2-4559 2-3946	05														
ct Namo:	Key Energy	Site Manager:				Cla	ir Gor	zale	8			-	-			AN			EOU	ECT			_	_
	State S Brine 1			Contractor of the		0.14		in the second se						(Circ	le or	Sp	ecify	y Me	tho	d No.)		
ct Location: ty, state)		Project #:	All and a second second second				2120-	HN-0	0522	,		-								11	11	11	1	
e lo:	Key Energy					-			0022			-		6								(Isii p		
ving Laboratory:	SGS Accutest	Sampler Signature:				N	Aatt N	lcDar	niel			-		O - MRI	Se Hg							diactio		
ionia.													82608	RO - OF	od Cr Ph			4 C/625			SO	nael fr		
			SAMPLING			MA	TRIX	PR	ESERV/	O	2	2	BTEX Set to C3	RO - DI	As Ba C	-		00B / 62	8		m	lance		
AB# NBUSE DNLY	SAMPLE IDENTIFICATION	YEAR	E	1	w	TER		- 6	2	Τ	ONTAINER	ERED (Y/I	TX1005 (E	8015M (G 8270C	Metals Ag	Volatiles Sami Vola		IS Vol. 82(Semi. Vo	s 8082/60	(Asbestos)	ide Sod	VCation Ba	uctivity	
Fresh Wat	er		DA		T I	AN C		<u>P</u> I	ĕ	+	= CC	FILT	TPH	HAH	TOLF	TCLF	RCI I	GCM	PCB'	PLM	Chior	Anion	Cond	H
2 Brine Wate	er Well			10/24/2017		X	+	+	ł	+	3	-	+		\square	\square	++	-			x	X	X	X
				1012-02017			+	+	14	+	3	-+	+	+	\vdash	+				++	X	X	X	X
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ison lishe	13/112 11:00	FIKE	Date:	Time:	¥.							S	Imple	Tempera	iture		RUS	H: Si	ame Da	ay 24	hr 4	thr 7	2 hr	
ished by:	Date: Time:	Received by	10111	095	<u>v</u>											Г	Rush	Char	les Au	thorize	đ			
		heleved by.	vale:	Time:													Spec	ial Rec	port Lin	nits or	TRRP	Report		
						_	_	_				_				_		TI				in the second		

TD11627: Chain of Custody Page 1 of 5 **4**:4

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TD11627: Chain of Custody Page 2 of 5



SGS Accutest Sample Receipt Summary

Page 1 of 3

Job Number: TD116	627	Client:	TETRA TI	ECH		Project:				
Date / Time Received:			Delivery	Method		Airbill #'s: 674687973533				
No. Coolers: 1	Therm ID:	IR-4;				Temp Adjustment Factor:	0;			
Cooler Temps (Initial/Adjusted	l): <u>#1:(2.6</u>	6/2.6);								
Cooler Security Y	or N			Yc	or N	Sample Integrity - Documentation	<u> </u>	or	N	
1. Custody Seals Present:		3. COC P	Present:	\checkmark		1. Sample labels present on bottles:	\checkmark			
2. Custody Seals Intact:	4	. Smpl Date	es/Time OK		\checkmark	2. Container labeling complete:	\checkmark			
Cooler Temperature	Y or I	<u>N_</u>				3. Sample container label / COC agree:	\checkmark			
1. Temp criteria achieved:						Sample Integrity - Condition	<u>Y</u>	or	N	
2. Cooler temp verification:						1. Sample recvd within HT:	\checkmark			
3. Cooler media:	Ice (Ba	ig)	_			2. All containers accounted for:				
Quality Control Preservation	Y or	N N/A	<u>\</u>	WTB	STB	3. Condition of sample:		Inta	ct	
1. Trip Blank present / cooler:						Sample Integrity - Instructions	Y	or	N	N/A
2. Trip Blank listed on COC:						1. Analysis requested is clear:				
3. Samples preserved properly:	✓ [2. Bottles received for unspecified tests			\checkmark	
4. VOCs headspace free:						3. Sufficient volume recvd for analysis:				
	-	_				4. Compositing instructions clear:				\checkmark
						5. Filtering instructions clear:				\checkmark

TD11627: Chain of Custody Page 3 of 5



4.1 **4**



CSR:

Response:

Response Date: _____

TD11627: Chain of Custody Page 4 of 5

Page 2 of 3



Sample Receipt Log

Page 3 of 3

4.1

4

Job #: TD11627

Date / Time Received: 11/1/2017 9:30:00 AM

Initials: bg

Client: TETRA TECH

Cooler #	Sample ID:	Vol	Bot #	Location	Pres	рН	Therm ID	Initial Temp	Therm CF	Corrected Temp
1	TD11627-1	1000ml	1	3J	N/P	Note #2 - Preservative check not applicable.	IR-4	2.6	0	2.6
1	TD11627-1	500ml	2	3J	N/P	Note #2 - Preservative check not applicable.	IR-4	2.6	0	2.6
1	TD11627-1	250ml	3	SUB	HNO3	pH < 2	IR-4	2.6	0	2.6
1	TD11627-2	1000ml	1	3J	N/P	Note #2 - Preservative check not applicable.	IR-4	2.6	0	2.6
1	TD11627-2	500ml	2	3J	N/P	Note #2 - Preservative check not applicable.	IR-4	2.6	0	2.6
1	TD11627-2	250ml	3	SUB	HNO3	pH < 2	IR-4	2.6	0	2.6

TD11627: Chain of Custody Page 5 of 5





Section 5

General Chemistry

QC Data Summaries

Includes the following where applicable:

- Method Blank and Blank Spike Summaries
- Duplicate Summaries
- Matrix Spike Summaries



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TD11627

METHOD BLANK AND SPIKE RESULTS SUMMARY GENERAL CHEMISTRY

Login Number: TD11627 Account: KEYETXM - Key Energy Project: State# 1 Brine Station

Analyte	Batch ID	RL	MB Result	Units	Spike Amount	BSP Result	BSP %Recov	QC Limits	
Chloride Fluoride Solids, Total Dissolved Solids, Total Dissolved	GP44917/GN85769 GP44917/GN85769 GN85673 GN85707	0.50 0.50 10 10	0.0 0.0 0.0 0.0	mg/l mg/l mg/l mg/l	10 10 500 500	9.55 9.11 492 488	95.5 91.1 98.4 97.6	90-110% 90-110% 88-110% 88-110%	5.1
Sulfate	GP44917/GN85769	0.60	0.0	mg/l	10	9.39	93.9	90-110%	

Associated Samples: Batch GN85673: TD11627-1 Batch GN85688: TD11627-1, TD11627-2 Batch GN85707: TD11627-2 Batch GP44917: TD11627-1, TD11627-2 (*) Outside of QC limits



DUPLICATE RESULTS SUMMARY GENERAL CHEMISTRY

Login Number: TD11627 Account: KEYETXM - Key Energy Project: State# 1 Brine Station

Analyte	Batch ID	QC Sample	Units	Original Result	DUP Result	RPD	QC Limits	
Chloride	GP44917/GN85769	TD11560-1	mg/l	31.6	35.1	10.5	0-20%	5.2
Fluoride	GP44917/GN85769	TD11560-1	mg/l	1.2	0.0	200.0(a)	0-20%	
Solids, Total Dissolved	GN85673	LA38485-7	mg/l	334	327	2.1	0-5%	ப
Solids, Total Dissolved	GN85707	LA38508-1	mg/l	424	426	0.5	0-5%	
Specific Conductivity	GN85688	LA38485-7	umhos/cm	571	571	0.0	0-10%	
Sulfate	GP44917/GN85769	TD11560-1	mg/l	26.4	27.2	3.0	0-20%	
pH	GN85718	TD11627-1	su	7.66	7.66	0.0	0-10%	
Associated Samples:								

Batch GN85673: TD11627-1 Batch GN85688: TD11627-1, TD11627-2 Batch GN85707: TD11627-2 Batch GN85718: TD11627-1, TD11627-2 Batch GP44917: TD11627-1, TD11627-2 (*) Outside of QC limits

(a) RPD acceptable due to low duplicate and sample concentrations.



MATRIX SPIKE RESULTS SUMMARY GENERAL CHEMISTRY

Login Number: TD11627 Account: KEYETXM - Key Energy Project: State# 1 Brine Station

Analyte	Batch ID	QC Sample	Units	Original Result	Spike Amount	MS Result	%Rec	QC Limits	
Chloride Fluoride	GP44917/GN85769 GP44917/GN85769	TD11560-1 TD11560-1	mg/l mg/l	31.6 1.2	50 50	81.3 46.1	99.4 89.8	80-120% 80-120%	5.3
Sulfate	GP44917/GN85769	TD11560-1	mg/l	26.4	50	74.3	95.8	80-120%	

Associated Samples: Batch GP44917: TD11627-1, TD11627-2

(*) Outside of QC limits
(N) Matrix Spike Rec. outside of QC limits



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Section 6

Misc. Forms

Custody Documents and Other Forms

(SGS Accutest Lafayette)

Includes the following where applicable:

• Chain of Custody

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	ACC ACC	UTEST		10165 Ha	rwin Dri	ve, Hous	ton, TX 7	7036					1	FEQ-EX	Tracking #		-		Bottle O	rder Centrol	18		
				TEL, 713	271-470	0 FAX	713-271-	4770						SGS Acc	stest Quote 4			-	SGS Ac	dol, Renkus,	TD1	1627	
Company	Client / Reporting Information	Design Manual		Project	Informa	ation							. 1		Reque	sted Ana	lysis (i	see TES	TCODE	Esheet)		Matrix Code
SG	Accutest	Projectivane.		Chata#	1 Delma	Ctation								111	1.01						11		
Street ,4	ddress	Street		Julie	Dinte	Oradio	_	_	_	-	_	_	-						1.1				GW - Ground Wa
101	55 Harwin Drive				Billing	Informatio	on (if diffe	rent fi	rom Res	oart te	2	-										1	SW - Surface W
Hou	State Zip	City		State	Compan	iy Name														1 1			SC + Sol SL+ Skudge
hoject.	Contact E-mail	Projeci#			Street A	ddress		_	_	_		_	-										SED-Sedimer Of - Oil
elect	a.brown@sgs.com				1												1			1.1			AIR - Ar
713	71-4700	Client Purchase C	Vider #		City			5	State			Zip	1.1										SOL - Other So WP - Wipe
Sample	(s) Name(s) Phone	Project Manager			Attention	e.		_	-	_	-		_										FB-Field Blant FB-Equipment BI
_		1.00				-																	RB- Rinse Blan TE-Trio Blank
-	Automatical sectors and			Collection	-	1.	11.5	-	Number	of pre	Berved	Bottles	-			1		1 .	1.		161	1	
Ausspest Sample 2	Field ID / Point of Collection	MECHIDI VIMA	Date	Time	Sampled	Matrix	# of boltes	ō	NO3	CSO4	Vietn	ROH		š.			1.	1.1	1				in the second second
1	FRESH WATER		10/24/17	12:00:00 AM		40	4	-	2 2	± 2	1	5 11	++	VI	-		-	-	-	-	-+-	_	LAB USE ON
2	BRINE WATER WELL		10/24/17	12:00:00 AM		40	1	H	-	+		-	H	×	-	-	+	+	-	++		+	15
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1	Std. 10 Business Days	approved by [500 k	A GARCELETIE), / LARCE		H	Commerc	al "B" (Le	ivel 2))	F	NYA T	ASP Ca	treor	y A y B	U								
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1	3 Day EMERGENCY				NJ Reduced EDD Format					- 1		. 1	Ser.										
1	1 Day EMERGENCY				1	Commarc	Commission		+ Patul	X	0.0	er CO	MME	3	-		-	2					
, i	diher Due 11/8/2017			1000			Commerci	al "8"	= Result	s+Q	C Sum	many											
Enter	gency & Kush T/A data available VIA Labink		Sample Custo	ody must be do	cument	ed below	NJ Reduce	td = R	tesuits +	QC S	umma ne ne	ry + Ph	rtal Ra	etab wa		Intian	_	_					
Reling	uished by Sampler: Date Te	F	leceived By:				- unit	Reting	uished B	A1	le ho		1011, ET	re au unit	couner	Date 1	inte:	-	Received	B); []	-		10
Ban	18 7012 UVW12 181	00 1	565					25	1.0										la A	211.	1000	18111	1

TD11627: Chain of Custody Page 1 of 2 SGS Accutest Lafayette



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SGS Accutest Sample Receipt Summary

Job Number: T	11627		Client: SC	S (TX)				Project: BRINE STATIC	ON			
Date / Time Received: 11	/7/2017 7	7:42:00	AM De	livery Met	hod:		Accutest Courier	Airbill #'s:				
Cooler Temps (Initial/Adjus	ted): <u>#1</u>	<u>1: (1.8/1</u>	<u>.8);</u> DV441									
Cooler Security	<u>Yor N</u>	<u> </u>		_	<u>í or</u>	<u>N</u>	Sample Integri	ty - Documentation	Y	or	N	
1. Custody Seals Present:	2 [] 3	3. COC Prese	nt: 💽			1. Sample labels	present on bottles:	\checkmark			
2. Custody Seals Intact:] 4. S	impl Dates/Ti	me OK 💽			2. Container labe	ling complete:	\checkmark			
Cooler Temperature	<u>Y</u>	or N					3. Sample contai	ner label / COC agree:	\checkmark			
1. Temp criteria achieved:	\checkmark						Sample Integr	ity - Condition	Y	or	N	
2. Thermometer ID:	C)V441;					1 Sample recycl	within HT [.]	\checkmark			
3. Cooler media:	Ice (di	irect con	tact)				2. All containers	accounted for:				
4. No. Coolers:		1					3. Condition of sa	ample:		Intact	t	
Quality Control Preservation	<u>on Y</u>	or N	N/A				Sample Integr	ity - Instructions	Y	or	N	N/A
1. Trip Blank present / cooler:			\checkmark				1 Analysis requ	ested is clear:				
2. Trip Blank listed on COC:			\checkmark				2. Bottles receiv	ed for unspecified tests			\checkmark	
3. Samples preserved properly	. 🗸						3. Sufficient volu	ime recvd for analysis:				
4. VOCs headspace free:			\checkmark				4. Compositing	instructions clear:				\checkmark
							5. Filtering instru	uctions clear:				\checkmark

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TD11627: Chain of Custody Page 2 of 2





Section 7

Metals Analysis

QC Data Summaries

(SGS Accutest Lafayette)

Includes the following where applicable:

- Method Blank Summaries
- Matrix Spike and Duplicate Summaries
- Blank Spike and Lab Control Sample Summaries
- Serial Dilution Summaries



TD11627

Login Number: TD11627 Account: ALGC - SGS Accutest Gulf Coast Project: KEYETXM: State# 1 Brine Station

QC Batch ID: MP9713 Matrix Type: AQUEOUS Methods: SW846 6010C Units: ug/l

Prep Date:					11/07/17
Metal	RL	IDL	MDL	MB raw	final
Aluminum	100	14	46		
Antimony	6.0	1.4	3.7		
Arsenic	10	1.9	2.6		
Barium	10	.21	1.3		
Beryllium	4.0	.05	.3		
Boron	100	.95	10		
Cadmium	5.0	.13	.9		
Calcium	100	5.1	58		
Chromium	10	.29	.9		
Cobalt	10	.15	.8		
Copper	10	.43	4		
Iron	100	2.8	33		
Lead	10	.9	1.8		
Lithium	10	1.1	6.3		
Magnesium	100	18	37		
Manganese	10	.05	1.1		
Molybdenum	10	.15	1.1		
Nickel	10	.3	1		
Potassium	500	25	50		
Selenium	10	1.7	3.6		
Silver	10	.32	1.4		
Sodium	500	6.5	53	-41	<500
Strontium	10	.09	1		
Thallium	5.0	1.3	1.6		
Tin	10	.76	.9		
Titanium	10	.46	1.7		
Vanadium	10	.33	.9		
Zinc	20	.63	4.3		

Associated samples MP9713: TD11627-1, TD11627-2

Results < IDL are shown as zero for calculation purposes (*) Outside of QC limits (anr) Analyte not requested

Login Number: TD11627 Account: ALGC - SGS Accutest Gulf Coast Project: KEYETXM: State# 1 Brine Station

QC Batch ID: MP9713 Matrix Type: AQUEOUS Methods: SW846 6010C Units: ug/l

Prep Date:			11/07/17	
Metal	TD11683-1 Original MS	Spikelo ICPSPIK	: El% Rec	QC Limits
Aluminum				
Antimony				
Arsenic				
Barium				
Beryllium	anr			
Boron				
Cadmium				
Calcium				
Chromium				
Cobalt				
Copper				
Iron	anr			
Lead	anr			
Lithium				
Magnesium				
Manganese	anr			
Molybdenum				
Nickel				
Potassium				
Selenium				
Silver				
Sodium	697000 660000	10000	-370.0(a	75-125
Strontium				
Thallium				
Tin				
Titanium				
Vanadium				
Zinc				
Associated sam	nples MP9713: TD11	627-1, TD	11627-2	
Results < IDL (*) Outside of (N) Matrix Spi (anr) Analyte (a) Spike amou informatio	are shown as zero E QC limits ike Rec. outside o not requested int low relative to on.	for calcu f QC limit o the samp	ulation pu ts ple amount	rposes . Refer to lab control or spike blank for recovery



Login Number: TD11627 Account: ALGC - SGS Accutest Gulf Coast Project: KEYETXM: State# 1 Brine Station

QC Batch ID: MP9713 Matrix Type: AQUEOUS Methods: SW846 6010C Units: ug/l

Prep Date:				11/07/17								
Metal	TD11683-1 Original MSD	Spikelot ICPSPIKE1% F	Rec	MSD RPD	QC Limit							
Aluminum												
Antimony												
Arsenic												
Barium												
Beryllium	anr											
Boron												
Cadmium												
Calcium												
Chromium												
Cobalt												
Copper												
Iron	anr											
Lead	anr											
Lithium												
Magnesium												
Manganese	anr											
Molybdenum												
Nickel												
Potassium												
Selenium												
Silver												
Sodium	697000 653000	10000 -44	40.0(a	1.1	20							
Strontium												
Thallium												
Tin												
Titanium												
Vanadium												
Zinc												
Associated sam	nples MP9713: TD11	527-1, TD11627	7-2									
Results < IDL (*) Outside of (N) Matrix Spi (anr) Analyte (a) Spike amou informatic	are shown as zero EQC limits Lke Rec. outside o not requested unt low relative to on.	for calculati E QC limits o the sample a	ion pu: amount	rposes . Refer	to lab control or spike blank for recovery							





SPIKE BLANK AND LAB CONTROL SAMPLE SUMMARY

Login Number: TD11627 Account: ALGC - SGS Accutest Gulf Coast Project: KEYETXM: State# 1 Brine Station

QC Batch ID: MP9713 Matrix Type: AQUEOUS Methods: SW846 6010C Units: ug/l

Prep Date:			11/0//1/	
Metal	BSP Result	Spikelot ICPSPIKE	1% Rec	QC Limits
Aluminum				
Antimony				
Arsenic				
Barium				
Beryllium	anr			
Boron				
Cadmium				
Calcium				
Chromium				
Cobalt				
Copper				
Iron	anr			
Lead	anr			
Lithium				
Magnesium				
Manganese	anr			
Molybdenum				
Nickel				
Potassium				
Selenium				
Silver				
Sodium	9700	10000	97.0	80-120
Strontium				
Thallium				
Tin				
Titanium				
Vanadium				
Zinc				
Associated sa	mples MP9'	713: TD116	27-1, TD1	.1627-2
Results < IDL (*) Outside o	are shown	n as zero ts	for calcu	lation purposes



SERIAL DILUTION RESULTS SUMMARY

Login Number: TD11627 Account: ALGC - SGS Accutest Gulf Coast Project: KEYETXM: State# 1 Brine Station

QC Batch ID: MP9713 Matrix Type: AQUEOUS Methods: SW846 6010C Units: ug/l

Prep Date:		11/07/17	
Metal	TD11683-1 Original SDL 1:5	%DIF	QC Limits
Aluminum			
Antimony			
Arsenic			
Barium			
Beryllium	anr		
Boron			
Cadmium			
Calcium			
Chromium			
Cobalt			
Copper			
Iron	anr		
Lead	anr		
Lithium			
Magnesium			
Manganese	anr		
Molybdenum			
Nickel			
Potassium			
Selenium			
Silver			
Sodium	697000 860000	23.4*(a)	0-10
Strontium			
Thallium			
Tin			
Titanium			
Vanadium			
Zinc			
Associated sam	mples MP9713: TD11	627-1, TD1	1627-2
Results < IDL (*) Outside o: (anr) Analyte	are shown as zero f QC limits not requested	for calcu	lation purposes









Misc. Forms

Custody Documents and Other Forms

(SGS Accutest New Jersey)

Includes the following where applicable:

• Chain of Custody



	JUJ ACC	JTEST		10165 Ha TEL. 713-	rwin Driw 271-4700	e, Houst FAX:	on, TX 77 713-271-4	036 770						SGS A	642	4	21	469	9	Bottle Ord	test Job	1	1607	
	Client / Penorting Information	www.sgs.com							Requested Analysis (see TEST					CODE sheet)										
Company Name: Project Name:						Information								+	T	lested	Analys	15 (50	1EST		sneety			Matrix Codes
SGS	Accutest			State#	1 Brine	Station																		DW - Drinking Wat
101	ddress 55 Harwin Drive	Street		Ciata	Billing Information (if different from Report to)																			WW - Water SW - Surface Wat SO - Soil
Hou	ston TX 77036	Project #		Street Ad	dress				_			_											SED-Sediment OI - OI	
elect	a.brown@sgs.com													l.										AIR - Air
thone #	Fax #	Client Purchase 0	Order #		City State Zip													SOL - Other Solid WP - Wipe FB-Field Blank						
ample	(s) Name(s) Phone	Project Manager			Attention	8																		RB- Rinse Blank TB-Trip Blank
SGS coutest	Field ID / Point of Collection		Date	Time	Sampled	Matrix	# of bottles	NOH	son	102204	Water a	HOW	NCORE	DENS.										LAB USE ON IN
			10/24/17	12:00:00 AM		40		I Z	Ť	T I		12	-	1 ×	-	-					-		+	T
-			10/24/17	12:00:00 AM		40	<u> </u>	+	+	H	1	+	+	÷	-	-	-				+	-	+	IX
								H	F	H	-	-	-		-		-				+	-	+	
																							\pm	
									t				-								+	+	\pm	
-	Turnaround Time (Business (avs)			I			Data	Delive	rable	Infor	natio	1	-	I	I		L	-	Com	ments / S	oecial In	structions	+	L
	Std. 10 Business Days Std. 10 Business Days 5 Day RUSH INITI/ 3 Day EMERGENCY 2 Day EMERGENCY 1 Day EMERGENCY LABE	Approved By (505	ENT B	Æ		Commerc Commerc FULLT1 (NJ Reduc Commerc	cial "A" (Li cial "B" (Li ced cial "C" Commerc	evel 1) evel 2)) ial "A" :	Res			WASF WASF State F EDD F Other	Categorms forms COM	iory A iory B MB	_			(***) 		le:			0.000	
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Relia	quirfied by Sampler: Date Th	517	Received By:	odet				Reling 2	F	Ea	ę	ø					n/	16/1	7	Received I	^{By} 5	A		
Relia	quished by Sampler:	ne:	Received By: 3					Reling 4	uished	By:							Date Tim	e:		Received I	By:			
Relin	quished by: Date Ta	ne:	Received By:					Custod	ly Sea					Interest		Preserv	ed where a	pplicable	1			Onlice	Coole	Temp 'r -1

TD11627: Chain of Custody Page 1 of 2 SGS Accutest New Jersey

SGS

SGS Accutest Sample Receipt Summary

Job Number: TD11	627 Client	:	Project:							
Date / Time Received: 11/16	/2017 9:10:00 AM	Delivery Method:	Delivery Method: Airbill #'s:							
Cooler Temps (Raw Measure	d) °C: Cooler 1: (1.8)	; Cooler 2: (2.1);								
Cooler Temps (Corrected	d) °C: Cooler 1: (2.7)	; Cooler 2: (3.0);								
Cooler Security Y 1. Custody Seals Present: ☑ 2. Custody Seals Intact: ☑ Cooler Temperature I. Temp criteria achieved: 1. Cooler temp verification:	or N □ 3. COC I □ 4. Smpl Dat <u>Y or N</u> IR Gun ICe (Bao)	Y or N Present: ♥ □ es/Time OK ♥ □	Sample Integrity - Documentation 1. Sample labels present on bottles: 2. Container labeling complete: 3. Sample container label / COC agree: Sample Integrity - Condition 1. Sample recvd within HT:	Y or N ♥ □ ♥ □ ♥ □ Y or N ♥ □						
4. No. Coolers:	2	-	 All containers accounted for: Condition of sample: 	Intact						
Quality Control_Preservation 1. Trip Blank present / cooler: 2. Trip Blank listed on COC: 3. Samples preserved properly: 4. VOCs headspace free:	Y or N N/	<u>A</u>	 Sample Integrity - Instructions 1. Analysis requested is clear: 2. Bottles received for unspecified tests 3. Sufficient volume recvd for analysis: 4. Compositing instructions clear: 	Y or N/A ♥ □ ♥ □ ♥ □ ♥ □ ♥ □ ♥ □ ♥ □						
Comments			5. Filtering instructions clear:							

SM089-02 Rev. Date 12/1/16

TD11627: Chain of Custody Page 2 of 2



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Section 9

General Chemistry

QC Data Summaries

(SGS Accutest New Jersey)

Includes the following where applicable:

- Method Blank and Blank Spike Summaries
- Duplicate Summaries
- Matrix Spike Summaries

6



TD11627
DUPLICATE RESULTS SUMMARY GENERAL CHEMISTRY

Login Number: TD11627 Account: ALGC - SGS Accutest Gulf Coast Project: KEYETXM: State# 1 Brine Station

Analyte	Batch ID	QC Sample	Units	Original Result	DUP Result	RPD	QC Limits
Density	GN72802	TD11627-1	g/ml	1.0	1.0	0.0	0-20%

Associated Samples: Batch GN72802: TD11627-1, TD11627-2 (*) Outside of QC limits







ACCUTEST

Gulf Coast

SGS ACCUTEST IS PART OF SGS, THE WORLD'S LEADING INSPECTION, VERIFICATION, TESTING AND CERTIFICATION COMPANY. 12/07/17

e-Hardcopy 2.0 Automated Report

Technical Report for

Key Energy

State# 1 Brine Station

SGS Accutest Job Number: TD12929



Sampling Date: 11/29/17

Report to:

Key Energy 6 Desota Drvie Suite 4300 Midland, TX 79705 bdinwiddie@keyenergy.com; Clair.Gonzales@tetratech.com; madeline.mauk@tetratech.com ATTN: Blake Dinwiddie

Total number of pages in report: 32





Test results contained within this data package meet the requirements of the National Environmental Laboratory Accreditation Program and/or state specific certification programs as applicable.

Client Service contact: Electa Brown 713-271-4700

Certifications: TX (T104704220-17-27) AR (14-016-0) AZ (AZ0769) FL (E87628) KS (E-10366) LA (85695/04004) NJ (TX010) OK (2017-002) VA (8999)

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Gulf Coast • 10165 Harwin Drive • Suite 150 • Houston, TX 77036 • tel: 713-271-4700 • fax: 713-271-4770 • http://www.accutest.com



ACCUTEST

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Sample Summary

Key Energy

Job No: TD12929

State# 1 Brine Station

Sample	Collected			Matr	ix	Client
Number	Date	Time By	Received	Code	Туре	Sample ID
TD12929-1	11/29/17	10:20	11/30/17	AQ	Water	FRESH WATER
TD12929-2	11/29/17	09:55	11/30/17	AQ	Water	BRINE WATER WELL

Summary of Hits

Job Number:	TD12929
Account:	Key Energy
Project:	State# 1 Brine Station
Collected:	11/29/17

Lab Sample ID Analyte	Client Sample ID	Result/ Qual	RL	MDL	Units	Method
TD12929-1	FRESH WATER					
Sodium ^a Chloride Density ^b Solids, Total Diss Specific Conduct pH ^c	solved ivity	1130000 700 1.0 1550 2710 8.32	5000 25 10 1.0		ug/l mg/l g/ml mg/l umhos/cm su	SW846 6010C EPA 300.0 ASTM DEF SM 2540C-2011 EPA 120.1 SM 4500H+ B-2011
TD12929-2	BRINE WATER V	WELL				
Sodium ^a Chloride Density ^b		128000000 146000 1.2	250000 5000		ug/l mg/l g/ml	SW846 6010C EPA 300.0 ASTM DEF
Solids, Total Diss Specific Conduct pH ^d	solved ivity	262000 2650 6.99	1000 1.0		mg/l umhos/cm su	SM 2540C-2011 EPA 120.1 SM 4500H+ B-2011

(a) Analysis performed at SGS Accutest, Lafayette, LA.

(b) Analysis performed at SGS Accutest, Dayton, NJ.

(c) Field analysis required. Received out of hold time and analyzed by request.temp 21.3 c

(d) Field analysis required. Received out of hold time and analyzed by request temp 21.7 c



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Section 3 😡

Sample Results

Report of Analysis



SGS Accutest

				Rep	ort of A	nalysis			Page 1 of
Client Sample I Lab Sample ID Matrix:	ID: FRESH : TD129 AQ - V	H WATE 29-1 Vater	R					Date Sampled: Date Received: Percent Solids:	11/29/17 11/30/17 n/a
Project:	State#	1 Brine S	tation					rereent bonus.	11/ u
Total Metals A	nalysis								
Analyte	Result	RL	Units	DF	Prep	Analyzed	By	Method	Prep Method
Sodium ^a	1130000	5000	ug/l	10	12/04/17	12/05/17	ALA	SW846 6010C ¹	SW846 3010A ²

(1) Instrument QC Batch: L:MA10056

(2) Prep QC Batch: L:MP10002

(a) Analysis performed at SGS Accutest, Lafayette, LA.

Page 1 of 1

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SGS Accutest

		Report of Analysis			Page 1 of 1	မ .4
Client Sample ID: Lab Sample ID: Matrix:	FRESH WATER TD12929-1 AQ - Water		Date Sampled: Date Received:	11/29/17 11/30/17		ယ
Project:	State# 1 Brine Station		Percent Solids:	n/a		
Comonal Chamister					J	

Report of Analysis

General Chemistry

Analyte	Result	RL	Units	DF	Analyzed	By	Method
Chloride	700	25	mg/l	50	12/05/17 05:04	SM	EPA 300.0
Density ^a	1.0		g/ml	1	12/07/17	ANJ	ASTM DEF
Solids, Total Dissolved	1550	10	mg/l	1	12/01/17	MS	SM 2540C-2011
Specific Conductivity	2710	1.0	umhos/cm	1	12/01/17 17:00	PA	EPA 120.1
pH ^b	8.32		su	1	11/30/17 20:30	OZ	SM 4500H+ B-2011

(a) Analysis performed at SGS Accutest, Dayton, NJ.

(b) Field analysis required. Received out of hold time and analyzed by request.temp 21.3 c



Client Sample I Lab Sample ID Matrix:	D: BRINE : TD1292 AQ - W	WATER 29-2 ⁷ ater	WELL					Date Sampled: Date Received: Percent Solids:	11/29/17 11/30/17 n/a
Project:	State# 1	Brine St	ation						
Total Metals A	nalysis								
Analyte	Result	RL	Units	DF	Prep	Analyzed	By	Method	Prep Method
Sodium ^a	128000000	250000	ug/l	500	12/04/17	12/04/17	ALA	SW846 6010C ¹	SW846 3010A ²

Report of Analysis

(1) Instrument QC Batch: L:MA10053

(2) Prep QC Batch: L:MP10002

(a) Analysis performed at SGS Accutest, Lafayette, LA.

Page 1 of 1

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3.2



SGS Accutest

Client Sample ID: Lab Sample ID: Matrix: Project:	BRINE WATER WEL TD12929-2 AQ - Water State# 1 Brine Station	L			Date Sampl Date Receiv Percent Sol	ed: 11/29/17 red: 11/30/17 ids: n/a	
General Chemistry Analyte	Result	RL	Units	DF	Analyzed	By Method	

Report of Analysis

					·	v	
Chloride	146000	5000	mg/l	10000	12/05/17 05:19	SM	EPA 300.0
Density ^a	1.2		g/ml	1	12/07/17	ANJ	ASTM DEF
Solids, Total Dissolved	262000	1000	mg/l	1	12/01/17	MS	SM 2540C-2011
Specific Conductivity	2650	1.0	umhos/cm	1	12/01/17 17:00	PA	EPA 120.1
pH ^b	6.99		su	1	11/30/17 20:30	OZ	SM 4500H+ B-2011

(a) Analysis performed at SGS Accutest, Dayton, NJ.

(b) Field analysis required. Received out of hold time and analyzed by request.temp 21.7 c



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Section 4

Misc. Forms

Custody Documents and Other Forms

Includes the following where applicable:

• Chain of Custody



TD12929

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Analysis Request of Chain of Custody Record Page 1 of Tetra Tech, Inc. T: 4500 N. Big Spring Street, Ste 401 Micland, Texas 79705 Tel (432) 682-4559 Fax (432) 682-3946 Name Key Energy te Manage Madeline Maulk ANALYSIS REQUEST State S Brine 1 (Circle or Specify Method No.) voject Locati county, state) Lea County, New Mexico 212C-HN-00522 Tetra Tech, Inc. SGS Accutest Impler Signature: Clair Gonzales ORO - MRO otal Metals Ag As Ba Cd Cr SAMPLING MATRIX PRESERVATIVE GRO Metals Ag As CONTAINERS ILTERED (Y/N) LAB # SAMPLE IDENTIFICATION EAR TX1005 5M (LAB USE ONLY Vol. DATE INE SOIL HNO, MS SM Fresh Water 11/29/2017 1D20 x x Ż Brine Water Well x x x x 11/29/2017 0955 x X x xxx BY 1.21 182 Onzal 11/29/17 LAB USE ONLY 1145 Jugar 1:34 11/29/17 11:45 1.2017 RUSH: Same Day 24 hr 48 hr 72 hr 227 11-12-17 In Ta 107 0 Rush Charges Authorized Q 1 0 Special Report Limits or TRRP Report ORIGINAL COPY VERED FEDEX UPS Tra

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TD12929: Chain of Custody Page 1 of 4





TD12929: Chain of Custody Page 2 of 4



SGS Accutest Sample Receipt Summary

Page 1 of 2

4.1 **4**

Job Number: TD129	29	Client:	TETRA TE	CH	Project: 212C HN 00522					
Date / Time Received: 11/30/2	2017 10:30:	00 AM	Delivery N	lethod:		Airbill #'s: 674687974378				
No. Coolers: 1	Therm ID:	IR9;				Temp Adjustment Factor: 0				
Cooler Temps (Initial/Adjusted): <u>#1: (2/2</u>);								
Cooler Security Y	or N	3. COC Pr	esent:	<u>Y</u> o	<u>r N</u>	Sample Integrity - Documentation	<u>Y</u>	or N		
2. Custody Seals Intact:	4.	Smpl Dates	s/Time OK			Sample labels present on bottles: Container labeling complete:				
Cooler Temperature	Y or N	L				3. Sample container label / COC agree:	\checkmark			
Temp criteria achieved: Cooler temp verification: Cooler media:	Ice (Bag]])				Sample Integrity - Condition 1. Sample recvd within HT:	_Y ☑	or N		
Quality Control Preservation	V or			WTR	STR	 All containers accounted for: Condition of sample: 	\checkmark			
1. Trip Blank present / cooler: 2. Trip Blank listed on COC:						Sample Integrity - Instructions Analysis requested is clear:	<u>Y</u> ✓	or N	<u></u> <u>N/A</u>	
3. Samples preserved properly:						2. Bottles received for unspecified tests		\checkmark		
4. VOCs headspace free:						 Sufficient volume recvd for analysis: Compositing instructions clear: Eittering instructions clear: 				
Comments										

TD12929: Chain of Custody Page 3 of 4



Sample Receipt Log

Page 2 of 2

4.1

4

Date / Time Received: 11/30/2017 10:30:00 AM 10:

Initials: EC

Client: TETRA TECH

Job #: TD12929

Cooler #	Sample ID:	Vol	Bot #	Location	Pres	рН	Therm ID	Initial Temp	Therm CF	Corrected Temp
1	TD12929-1	1000ml	1	3Q	N/P	Note #2 - Preservative check not applicable.	IR9	2	0	2
1	TD12929-1	500ml	2	3Q	N/P	Note #2 - Preservative check not applicable.	IR9	2	0	2
1	TD12929-1	500ml	3	SUB	HNO3	pH < 2	IR9	2	0	2
1	TD12929-2	1000ml	1	3Q	N/P	Note #2 - Preservative check not applicable.	IR9	2	0	2
1	TD12929-2	500ml	2	3Q	N/P	Note #2 - Preservative check not applicable.	IR9	2	0	2
1	TD12929-2	500ml	3	SUB	HNO3	pH < 2	IR9	2	0	2

TD12929: Chain of Custody Page 4 of 4





Section 5

General Chemistry

QC Data Summaries

Includes the following where applicable:

- Method Blank and Blank Spike Summaries
- Duplicate Summaries
- Matrix Spike Summaries



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TD12929

METHOD BLANK AND SPIKE RESULTS SUMMARY GENERAL CHEMISTRY

Login Number: TD12929 Account: KEYETXM - Key Energy Project: State# 1 Brine Station

Analyte	Batch ID	RL	MB Result	Units	Spike Amount	BSP Result	BSP %Recov	QC Limits	
Chloride Solids, Total Dissolved	GP45305/GN86354 GN86287 CN86285	0.50	0.0	mg/l mg/l	10 500	9.98 478	99.8 95.6	90-110% 88-110%	5.1
Sulfate	GP45305/GN86354	0.60	0.0	mg/l	10	10.3	103.0	90-110%	сл

Associated Samples: Batch GN86287: TD12929-1, TD12929-2 Batch GN86295: TD12929-1, TD12929-2 Batch GP45305: TD12929-1, TD12929-2 (*) Outside of QC limits



DUPLICATE RESULTS SUMMARY GENERAL CHEMISTRY

Login Number: TD12929 Account: KEYETXM - Key Energy Project: State# 1 Brine Station

Analyte	Batch ID	QC Sample	Units	Original Result	DUP Result	RPD	QC Limits	
Chloride Solids, Total Dissolved Specific Conductivity	GP45305/GN86354 GN86287 GN86295	LA39233-4 TD12929-1 LA39227-1	mg/l mg/l umhos/cm	1.7 1550 168	1.8 1550 168	5.7 0.0 0.0	0-20% 0-5% 0-10%	5.2
Sulfate pH	GP45305/GN86354 GN86280	LA39233-4 TD12929-2	mg/l su	9.2 6.99	9.4 6.99(a)	2.2	0-20% 0-10%	Сл
Associated Samples:								

Associated Samples: Batch GN86280: TD12929-1, TD12929-2 Batch GN86287: TD12929-1, TD12929-2 Batch GN86295: TD12929-1, TD12929-2 Batch GP45305: TD12929-1, TD12929-2 (*) Outside of QC limits (a) temp 21.7 c



MATRIX SPIKE RESULTS SUMMARY GENERAL CHEMISTRY

Login Number: TD12929 Account: KEYETXM - Key Energy Project: State# 1 Brine Station

Analyte	Batch ID	QC Sample	Units	Original Result	Spike Amount	MS Result	%Rec	QC Limits	
Chloride Sulfate	GP45305/GN86354 GP45305/GN86354	LA39233-4 LA39233-4	mg/l mg/l	1.7 9.2	10 10	11.2 19.6	95.0 104.0	80-120% 80-120%	5.3
Associated Samples: Batch GP45305: TD12929-1,	TD12929-2								сл

Associated Samples: Batch GP45305: TD12929-1, TD12929-2 (*) Outside of QC limits

(N) Matrix Spike Rec. outside of QC limits





Section 6

Misc. Forms

Custody Documents and Other Forms

(SGS Accutest Lafayette)

Includes the following where applicable:

• Chain of Custody

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TD12929

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1	FRESHW	ATER		11/29/17	10:20:00 AN	1	AQ	1	++	×	++	++	-	X		-						
2	BRINE WA	TER WELL		11/29/17	9:55:00 AM		AQ	1	11	X			-	X		_		1001		-		
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	2 Day EME	RGENCY			1	H	Commer	cial "C"				Other	COM	MB	- ·		6	4	Y			
10	1 Day EME	RGENCY		_				Commer	cial "A"	= Result	s Only							TI				
Ema	X other D	ue 12/7/2017 A data available ViA Labink						Commen NJ Redu	cial "B" ced = F	Results +	s + QC QC Su	Summa mmary +	ry Partis	Raw dat			-		11			
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TD12929: Chain of Custody Page 1 of 2 SGS Accutest Lafayette



SGS

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SGS Accutest Sample Receipt Summary

Date / Time Received: 12/2/2017 8:10:00 AM Delivery Method: Accutest Courier Airbill #'s: Cooler Temps (Initial/Adjusted): Q Y or N Sample Integrity - Documentation Y or N 1. Custody Seals Present: Image: Cooler Temps (Initial/Adjusted): Q Y or N Sample Integrity - Documentation Y or N 2. Custody Seals Intact: Image: Cooler Temps (Initial/Adjusted): Image: Cooler Temps (Initial/Adjusted): Y or N Sample Integrity - Documentation Y or N 2. Custody Seals Intact: Image: Cooler Temps (Initial/Adjusted): Image: Cooler Temps (Initial/Adjusted): Image: Cooler Image: Cooler Image: Cooler: Image: Cooler Image: Coole	Job Number: T	D12929	Client: SGS ACCUTEST		Project: STATE #1 BRI	NE STATION		
Cooler Temps (Initial/Adjusted): 9 Cooler Security Y or N Sample Integrity - Documentation Y or N 1. Custody Seals Present: 3. COC Present: I 1. Sample labels present on bottles: I 2. Custody Seals Intact: I 4. Smpl Dates/Time OK I 1. Sample labels present on bottles: I I 2. Custody Seals Intact: I 4. Smpl Dates/Time OK I Sample container labeling complete: I I Cooler Temperature Y or N I Sample Integrity - Condition Y or N I 1. Temp criteria achieved: I I I Sample Integrity - Condition Y or N 2. Cher media: Ice (Bag) I I. Sample recvd within HT: I I Intact 3. Cooler media: Ice (Bag) I Intact Intact Intact 9. No. Coolers: I I Sample Integrity Instructions Y or N N/A 1. Trip Blank listed on COC: I I Intage received for unspecified tests I I 3. Samples preserved properly: I I Intalysis requested is clear: I	Date / Time Received: 1	2/2/2017 8:10:0	0 AM Delivery Method:	Accutest Courier	Airbill #'s:			
Cooler Security Y or N Y or N Sample Integrity - Documentation Y or N 1. Custody Seals Present: 3. COC Present: 4. Smpl Dates/Time OK Cooler Temperature Y or N 4. Smpl Dates/Time OK Cooler Temperature Y or N Temp criteria achieved: Cooler media: Ice (Bag) A. No. Coolers: I 1. Sample Integrity - Condition Y or N 1. Temp criteria achieved: Image: Condemonstrate integrity - Condition Y or N 2. Thermometer ID: Image: Condition Y or N 3. Cooler media: Ice (Bag) Image: Condition Y or N 4. No. Coolers: Image: Condition Y or N Image: Condition of sample: Image: Condition of sample: 1. Trip Blank present / cooler: Image: Condition of sample:	Cooler Temps (Initial/Adju	ısted): <u>0</u>						
1. Custody Seals Present: Image: Struct Structure	Cooler Security	<u>Y or N</u>	<u>Y or</u>	N Sample Integ	rity - Documentation	<u>Y or</u>	N	
2. Custody Seals Intact: 4. Smpl Dates/Time OK Cooler Temperature Y or N 1. Temp criteria achieved: Sample container labeling complete: Sample Integrity - Condition Y or N All containers accounted for: All containers accounted for: Condition of sample: Intact Quality Control Preservation Y or N Y or N N/A 1. Trip Blank present / cooler: Image: Cooler integrity - Instructions Y or N N/A 1. Trip Blank listed on COC: Image: Cooler integrity - Cooler integrity - Instructions 3. Samples preserved properly: Image: Cooler integrity - Co	1. Custody Seals Present:		3. COC Present:	1 Sample label	Is present on bottles.	\checkmark		
Cooler Temperature Y or N 1. Temp criteria achieved: Image: Cooler Temperature 2. Thermometer ID: Image: Cooler Temperature 3. Cooler media: Ice (Bag) 3. Cooler media: Ice (Bag) 4. No. Coolers: 1 1. Trip Blank present / cooler: Image: Cooler Temperature Image: Condition Y or N N/A Sample Integrity - Condition 1. Trip Blank present / cooler: Image: Cooler Temperature Image: Cooler Temperature Y or N N/A Sample Integrity - Instructions Y or N N/A 1. Trip Blank present / cooler: Image: Cooler Temperature Image: Cooler Temperature Image: Cooler Temperature Image: Cooler	2. Custody Seals Intact:	✓ 4	. Smpl Dates/Time OK	2. Container lat	peling complete:	\checkmark		
1. Temp criteria achieved: Image: Sample Integrity - Condition Y or N 2. Thermometer ID: : 1. Sample Integrity - Condition Y or N 3. Cooler media: lce (Bag) 1. Sample recvd within HT: Image: Condition Y or N 4. No. Coolers: 1 1 Sample Integrity - Instructions Y or N N/A Quality Control Preservation Y or N N/A Sample Integrity - Instructions Y or N N/A 1. Trip Blank present / cooler: Image: Cooler Image: Cooler <td< td=""><td>Cooler Temperature</td><td><u>Y</u> or N</td><td><u>ı</u></td><td>3. Sample conta</td><td>ainer label / COC agree:</td><td>\checkmark</td><td></td><td></td></td<>	Cooler Temperature	<u>Y</u> or N	<u>ı</u>	3. Sample conta	ainer label / COC agree:	\checkmark		
2. Thermometer ID: : 3. Cooler media: Ice (Bag) 4. No. Coolers: 1 1 Sample recvd within HT: 2. All containers accounted for: Intact 3. Condition of sample: Intact Quality Control Preservation Y or N 1. Trip Blank present / cooler: Image: Sample Integrity - Instructions 2. Trip Blank listed on COC: Image: Sample Integrity - Instructions 3. Samples preserved properly: Image: Sample Integrity - Instructions 4. VOCs headspace free: Image: Sample Integrity - Instructions clear: 4. VOCs headspace free: Image: Sample Integrity - Instructions clear: 5. Filtering instructions clear: Image: Sample Integrity - Instructions clear: Comments	1. Temp criteria achieved:			Sample Integ	rity - Condition	<u>Y or</u>	N	
3. Cooler media: lce (Bag) 4. No. Coolers: 1 Quality Control Preservation Y or N N/A 1. Trip Blank present / cooler: Image: Section of the sect	2. Thermometer ID:	;		1. Sample recv	d within HT:	\checkmark		
4. No. Coolers: 1 3. Condition of sample: Intact Quality Control Preservation Y or N N/A Sample Integrity - Instructions Y or N N/A 1. Trip Blank present / cooler: Image: Sample Integrity - Instructions Y or N N/A 2. Trip Blank listed on COC: Image: Sample Integrity - Instructions Y or N N/A 3. Samples preserved properly: Image: Sample Integrity - Instructions Image: Sample Integrity - Instructions 4. VOCs headspace free: Image: Sample Integrity - Instructions clear: Image: Sample Integrity - Instructions clear: Image: Sample Integrity - Instructions clear: 5. Filtering instructions clear: Image: Sample Integrity - Instructions clear: Image: Sample Integrity - Instructions clear: Image: Sample Integrity - Instructions clear: 6. Compositing instructions clear: Image: Sample Integrity - Instructions clear: Image: Sample Integrity - Instructions clear: Image: Sample Integrity - Instructions clear: 6. Filtering instructions clear: Image: Sample Integrity - Instructions clear: Image: Sample Integrity - Instructions clear: Image: Sample Integrity - Instructions clear: 6. Comments Image: Sample Integrity - Instructions clear: Image: Sample Integrity - Instructions clear: Image: Sample Integrity - Instructions clear:	3. Cooler media:	Ice (Ba	g)	2. All containers	s accounted for:			
Quality Control Preservation Y or N N/A 1. Trip Blank present / cooler: Image: Control Preservation Image: Control	4. No. Coolers:	1		3. Condition of	sample:	Inte	ict	
1. Trip Blank present / cooler: Image: sector of the s	Quality Control_Preservat	<u>tion Y or</u>	N N/A	Sample Integ	rity - Instructions	Y or	N	 N/A
2. Trip Blank listed on COC: Image: State of the s	1. Trip Blank present / cooler	. 🗆 [1 Analysis rec	uested is clear:			
3. Samples preserved properly: Image: Composition of the second seco	2. Trip Blank listed on COC:			2. Bottles rece	ived for unspecified tests	•		
4. VOCs headspace free: Image: Compositing instructions clear: Image: Compositing instructins c	3. Samples preserved proper	rly: 🔽 🗌		3. Sufficient vo	lume recvd for analysis:			
5. Filtering instructions clear:	4. VOCs headspace free:			4. Compositing	instructions clear:			\checkmark
Comments				5. Filtering inst	ructions clear:			\checkmark
	Comments							

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TD12929: Chain of Custody Page 2 of 2





Section 7

Metals Analysis

QC Data Summaries

(SGS Accutest Lafayette)

Includes the following where applicable:

- Method Blank Summaries
- Matrix Spike and Duplicate Summaries
- Blank Spike and Lab Control Sample Summaries
- Serial Dilution Summaries



TD12929

QC Batch ID: MP10002 Matrix Type: AQUEOUS Methods: SW846 6010C Units: ug/l

Prep Date:					12/04/17	
Metal	RL	IDL	MDL	MB raw	final	
Aluminum	100	10	46			
Antimony	6.0	1.5	3.7			
Arsenic	10	1.5	2.6			
Barium	10	.25	1.3			
Beryllium	4.0	.04	.3			
Boron	100	1.4	10			
Cadmium	5.0	.13	.9			
Calcium	100	5.9	58			
Chromium	10	.35	.9			
Cobalt	10	.15	.8			
Copper	10	.98	4			
Iron	100	4.3	33			
Lead	10	.79	1.8			
Lithium	10	2	6.3			
Magnesium	100	19	37			
Manganese	10	3.6	1.1			
Molybdenum	10	.19	1.1			
Nickel	10	.67	1			
Potassium	500	37	50			
Selenium	10	1.7	3.6			
Silver	10	.42	1.4			
Sodium	500	89	53	-140	<500	
Strontium	10	.08	1			
Thallium	5.0	1.4	1.6			
Tin	10	.51	.9			
Titanium	10	.34	1.7			
Vanadium	10	.28	.9			
Zinc	20	9.9	4.3			

Associated samples MP10002: TD12929-1, TD12929-2

Results < IDL are shown as zero for calculation purposes (*) Outside of QC limits (anr) Analyte not requested



QC Batch ID: MP10002 Matrix Type: AQUEOUS Methods: SW846 6010C Units: ug/l

Prep Date:				12/04/17	
Metal	LA39343-2 Original MS		Spikelot ICPSPIKE	1% Rec	QC Limits
Aluminum					
Antimony					
Arsenic	anr				
Barium	anr				
Beryllium					
Boron					
Cadmium	anr				
Calcium					
Chromium	anr				
Cobalt					
Copper	anr				
Iron					
Lead	anr				
Lithium					
Magnesium					
Manganese					
Molybdenum					
Nickel					
Potassium					
Selenium	anr				
Silver	anr				
Sodium	489000 48	5000	10000	-40.0(a)	75-125
Strontium					
Thallium					
Tin					
Titanium					
Vanadium					
Zinc					
Associated sar	nples MP10002	: TD12	929-1, TD	12929-2	
Results < IDL (*) Outside of (N) Matrix Spi (anr) Analyte (a) Spike amou informatic	are shown as QC limits Lke Rec. outs not requeste unt low relat on.	zero ide of d ive to	for calcu QC limit the samp	lation pu s le amount	rposes . Refer to lab control or spike blank for recovery



24 of 32

QC Batch ID: MP10002 Matrix Type: AQUEOUS Methods: SW846 6010C Units: ug/l

Prep Date:					12/04/17	
Metal	LA39343-2 Original M	SD	Spikelot ICPSPIKE18	Rec	MSD RPD	QC Limit
Aluminum						
Antimony						
Arsenic	anr					
Barium	anr					
Beryllium						
Boron						
Cadmium	anr					
Calcium						
Chromium	anr					
Cobalt						
Copper	anr					
Iron						
Lead	anr					
Lithium						
Magnesium						
Manganese						
Molybdenum						
Nickel						
Potassium						
Selenium	anr					
Silver	anr					
Sodium	489000 4	67000	10000 -	220.0(a	3.8	20
Strontium						
Thallium						
Tin						
Titanium						
Vanadium						
Zinc						
Associated sam	nples MP1000	2: TD12	929-1, TD12	929-2		
Results < IDL (*) Outside of (N) Matrix Spi (anr) Analyte (a) Spike amou informatic	are shown a QC limits Lke Rec. out not request unt low rela on.	s zero : side of ed tive to	for calcula QC limits the sample	tion pu amount	rposes . Refer	to lab control or spike blank for recovery



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QC Batch ID: MP10002 Matrix Type: AQUEOUS Methods: SW846 6010C Units: ug/l

Prep Date:			12/04/17	
Metal	BSP Result	Spikelot ICPSPIKE	1% Rec	QC Limits
Aluminum				
Antimony				
Arsenic	anr			
Barium	anr			
Beryllium				
Boron				
Cadmium	anr			
Calcium				
Chromium	anr			
Cobalt				
Copper	anr			
Iron				
Lead	anr			
Lithium				
Magnesium				
Manganese				
Molybdenum				
Nickel				
Potassium				
Selenium	anr			
Silver	anr			
Sodium	8970	10000	89.7	80-120
Strontium				
Thallium				
Tin				
Titanium				
Vanadium				
Zinc				
Associated sam	mples MP1()002: TD12	929-1, TD	12929-2
Results < IDL (*) Outside o: (anr) Analyte	are shown f QC limit not reque	n as zero ts ested	for calcu	lation purposes



SERIAL DILUTION RESULTS SUMMARY

Login Number: TD12929 Account: ALGC - SGS Accutest Gulf Coast Project: KEYETXM: State# 1 Brine Station

QC Batch ID: MP10002 Matrix Type: AQUEOUS Methods: SW846 6010C Units: ug/l

Prep Date:		12/04/17	
Metal	LA39343-2 Original SDL 1:5	%DIF	QC Limits
Aluminum			
Antimony			
Arsenic	anr		
Barium	anr		
Beryllium			
Boron			
Cadmium	anr		
Calcium			
Chromium	anr		
Cobalt			
Copper	anr		
Iron			
Lead	anr		
Lithium			
Magnesium			
Manganese			
Molybdenum			
Nickel			
Potassium			
Selenium	anr		
Silver	anr		
Sodium	489000 506000	3.6	0-10
Strontium			
Thallium			
Tin			
Titanium			
Vanadium			
Zinc			
Associated sa	mples MP10002: TD1	2929-1, TD	12929-2
Results < IDL (*) Outside o (anr) Analyte	are shown as zero f QC limits not requested	for calcu	lation purposes





Misc. Forms

Custody Documents and Other Forms

(SGS Accutest New Jersey)

Includes the following where applicable:

• Chain of Custody



_	SGS AC	CUTEST		10165 Ha TEL 713-	rwin Driv 271-4700	e Houst	on, TX 71 713-271-	1036 4770					FEI	S Acoul	642	46	215	169	Bottle Order SGS Acoust	r Control #	TD1292	
-	Client / Reporting Information	1		Project	Informa	tion			-	-	-	-	+		Reques	ted Ana	lysis (s	ee TEST	CODE	sheet)		Matrix Codes
SGS	ny Name. S Accutest	Project Name:		State#	1 Brine	Station																DW - Drinking Wate GW - Ground Wate
101	65 Harwin Drive State 2	Street		State	Billing is	nformatio Name	n (if diffe	cent fro	m Rep	ort to	9	-										WW - Water SW - Surface Wate SO - Soil SL - Sk.doe
Hou	Contact E-mail	Project #	_	_	Street Ad	Idress	_	-	-	-		_	-									SED-Sedment OI - Oil UIQ - Other Liquid
thone a	a.brown@sgs.com F -271-4700	ax F Client Purchase	Order #		City		-	ŝı	ate		-	Zıp						1				SOL - Other Solid WP - Wpe FB-Field Blank
ample	r(s) Name(s)	Phone Project Manage			Attention	1													EB-Equipment Blank RB- Rinse Blank TB-Trip Blank			
SDE Contrat Service of	Field ID / Point of Collection	MECHOIVIN	Date	Time	Sangled by	Martin	# of bottles	HON	10NH	H2SO4 10	Ci Water	MECH ENCORE	Π	DENS								LAB USE ONLY
1	FRESH WATER		11/29/17	10:20:00 AM		AQ	1			,	•			x	1.1	-		-				
2	BRINE WATER WELL		11/29/17	9:55:00 AM		AQ	1			,				×			-			-		TX
														-	-	-						
-					-						F			-								
										+	+									-		
	Turnaround Time (Business days) Std. 10 Business Days 5 Day RUSH 3 Day EMERGENCY 2 Day EMERGENCY 1 Day EMERGENCY 1 Day EMERGENCY 2 Day EMERGENCY 2 Day EMERGENCY 1 Day EMERGENCY 2 Day EMERGENCY	HC:	Data Deliverable Information Commercial "A" (Lavel 1) NYASP Cete; Commercial "B" (Lavel 2) NYASP Cete; FULLT" (Lavel 24) State Forms NJ Reduced EDD Format Commercial "C" X) Other COM Commercial "C" X) Other COM Commercial "C" X) Other COM Commercial "C" = Results only Commercial "C = Commany								ategory a ategory ins nat DMMB	A	-	л 1	NITIAL	ASES	SMENT					
transformation of 2/4/11 Standing Custody must						led below	v each ti	Rent 2	T	chan DE	190 p	ossess	ion, inc	luding	g courier	delivery.	517	15	Received B	1. D	~	\rightarrow
Relin	quished by Sampler.	lata Time:	Received By:		Relinquisted By:											Date	These		Regeles	~		
Relin	quished by: C	late Time:	Received By:		-			Custod	iy Seal	1	-	-	0 ma	d	Pre	served whe	ere applicab			0	n ke	Cooler Tamp. / / 0

TD12929: Chain of Custody Page 1 of 2 SGS Accutest New Jersey



SGS

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SGS Accutest Sample Receipt Summary

Job Number: TD129	29 Client:		Project:							
Date / Time Received: 12/5/20	017 9:45:00 AM Deli	ivery Method:	Airbill #'s:							
coler Temps (Raw Measured) °C: Cooler 1: (1.1);										
Cooler Temps (Corrected) °C: Cooler 1: (2.0);										
Cooler SecurityY1. Custody Seals Present:Image: Cooler Temperature2. Custody Seals Intact:Image: Cooler Temperature	<u>or N</u> ☐ 3. COC Presen ☐ 4. Smpl Dates/Tim <u>Y or N</u>	<u>Y or N</u> .t: ☑ □ ne OK ☑ □	Sample Integrity - Documentation 1. Sample labels present on bottles: 2. Container labeling complete: 3. Sample container label / COC agree:	Y or N ✓ □ ✓ □ ✓ □						
Temp criteria achieved: Cooler temp verification: Cooler media: A. No. Coolers:	✓ ✓ IR Gun Ice (Bag) 1		Sample Integrity - Condition 1. Sample recvd within HT: 2. All containers accounted for: 3. Condition of sample:	Y or N V U Intact						
Quality Control _Preservation 1. Trip Blank present / cooler: 2. Trip Blank listed on COC: 3. Samples preserved properly: 4. VOCs headspace free:	Y or N/A □ ∅ □ □ ∅ □ ☑ □ □ ☑ □ □		 Sample Integrity - Instructions 1. Analysis requested is clear: 2. Bottles received for unspecified tests 3. Sufficient volume recvd for analysis: 4. Compositing instructions clear: 5. Filtering instructions clear: 	Y or N N/A V						
Comments		¶								

SM089-02 Rev. Date 12/1/16

> TD12929: Chain of Custody Page 2 of 2







Section 9

General Chemistry

QC Data Summaries

(SGS Accutest New Jersey)

Includes the following where applicable:

- Method Blank and Blank Spike Summaries
- Duplicate Summaries
- Matrix Spike Summaries

6



TD12929

DUPLICATE RESULTS SUMMARY GENERAL CHEMISTRY

Login Number: TD12929 Account: ALGC - SGS Accutest Gulf Coast Project: KEYETXM: State# 1 Brine Station

Analyte	Batch ID	QC Sample	Units	Original Result	DUP Result	RPD	QC Limits
Density	GN73592	TD12929-1	g/ml	1.0	1.0	0.0	0-20%

Associated Samples: Batch GN73592: TD12929-1, TD12929-2 (*) Outside of QC limits





Appendix C- Area of Review

- AOR Well Status List
- AOR Aerial Map

2017 BW-28 AOR Review-- Well Status List up-dated April 2018

								Within 1/4 mi AOR		Casing Program	Cased/Cemented	Corrective Action
	API#	Well Name	UI	Section	Ts	Ra	Footage	* within 800 ft		Checked	across salt section	Required
							·					
1	20 025 22547	Kay State no 001	~	15	210	270	1240 ENIL 8 220 ENIL	NA		NA		
1	30-025-33547	Apacho NEDIL 604	<u> </u>	15	215	370	2210 FNL & 330 FWL	INA	1	NA RO	Will shock if critical radius approaches	Will abook if aritical radius approaches
	30-025-06591	Apache NEDU 604	E	15	215	37e	2310 FNL & 990 FWL	yes		no	will check if critical radius approaches	will check if critical radius approaches
1	30-025-09913 (P&A)	Shell NEDU 603	E	15	21s	37e	3390 FSL & 4520 FEL	Yes*	1 1	yes	yes	no
1	30-025-09914	Apache NEDU 602	E	15	21s	37e	1980 FNL & 660 FWL	Yes*	1 1	yes	yes	no
1	30-025-35271	Apache NEDU 602625	E	15	21s	37e	2580 FNL & 1300 FWL	no		na	na	na
0	30-025-37223 Never Drilled **	Apache NEDU 628	E	15	21s	37e	1410 FNL & 380 FWL	Never Drilled	0 0	na	na	na
1	30-025-41600 (in Production 2014)	Apache NEDU 544	E	15	21s	37e	1355 FNL &1190 FWL	ves	0 1	Yes	ves	no
0	30-025-42237 (Withdrawn)	Anache NEDI 648	F	15	215	376	1640 ENL & 1300 EWI	Ves	0 1	na	na	na
	00 020 12207 (Milliandini)		-	10	215	070	io io ine a iooo i me	,05	0 1	Thu -	114	ind in the second se
1	20,025,04400	Chauman St. 002	C	15	210	27.0	440 ENIL 8 1000 EW/				20	80
	30-025-06809	Chevron St. 002	C	15	215	378	660 FNL & 1980 FWL	10		IId	Ha	IId
1	30-025-06611	Chevron St. 004	C	15	21s	37e	660 FNL & 2080 FWL	no		na	na	na
1	30-025-06613	Apache NEDU 605	С	15	21s	37e	760 FNL & 1980 FWL	no		na	na	na
1	30-025-34649	Apache NEDU 622	С	15	21s	37e	1229 FNL & 2498 FWL	no		na	na	na
1	30-025-34886	Apache NEDU 524	С	15	21s	37e	160 FNL & 1350 FWL	no		na	na	na
1	30-025-39831 (added 2010)	Chevron State S no. 2	С	15	21s	37e	990 FNL & 1330 FWL	yes	1	no	Will check if critical radius approaches	Will check if critical radius approaches
1	30-025-34887	Apache NEDU 624	С	15	21s	37e	1250 FNL & 1368 FWL	ves	1	no	Will check if critical radius approaches	Will check if critical radius approaches
1	30-025-41485	Brammer Engr. St No 12	ċ	15	216	370	990 ENI & 1330 EW/	Ves	1	V05+++	Ves	po
1	20.025-41592	Apacho NEDU 441	č	15	213	270	1240 ENIL & 1020 EW/	903		yc3+++	yes	10
	30-025-41583	Apache NEDU 550	0	15	215	376	1240 THE & 1930 TWE	110		i ia	i id	IId
_	30-025-41598	Apache NEDU 558	U	15	215	37e	150 FNL & 2295 FWL	по		na	па	na
1	30-025-06586	Chevron St. 001	D	15	21s	37e	660 FNL & 660 FWL	yes*	1 1	yes	yes	no
1	30-025-06612	Chevron St. 005	D	15	21s	37e	660 FNL & 990 FWL	yes	1	yes	yes	no
1	30-025-06614	Apache NEDU 601	D	15	21s	37e	600 FNL & 990 FWL	yes	1	yes	yes	no
1	30-025-36809	Apache NEDU 526	D	15	21s	37e	130 FNL & 330 FWL	yes	1	no	Will check if critical radius approaches	Will check if critical radius approaches
1	30-025-06585	Apache St. 002	F	15	215	37e	1980 FNL & 1980 FWI	no		na	na	na
1	30-025-06587	Apache NEDI L606	F	15	21c	370	3375 FSL & 3225 FEL	00		na	na	na
1	30-025-06587	Apache NEDU 600		15	213	270	1000 ENIL & 1000 ENIL	110		na	10	110
	30-025-06590	Apache NEDU 608		15	215	378	1980 FNL & 1880 FWL	no		na	lia	IId
	30-025-41275	Apache NEDU 650	F	15	215	37e	2550 FNL & 1925 FWL	no		na	па	na
0	30-025-42236 (Withdrawn)	Apache NEDU 647	F	15	21s	37e	1710 FNL & 2360 FWL	no		na	na	na
1	30-025-06603	Apache Argo 006	K	15	21s	37e	1650 FSL & 2310 FWL	no		na	na	na
1	30-025-06607(added 2010)	Apache Argo 011	K	15	21s	37e	2080 FSL & 1650 FWL	no		na	na	na
1	30-025-09918	Apache NEDU 703	K	15	21s	37e	1980 FSL & 1980 FWL	no		na	na	na
1	30-025-39828	Apache Argo 14	К	15	21s	37e	2190 FSL & 2130 FWL	no		na	na	na
1	30-025-34657	Anache NEDI (623	к	15	215	376	2540 ESL & 2482 EWI	no		na	na	na
1	20,025,04404	Apacho Argo 010	1	16	21c	270	1990 ESL & 760 EW/	20		00	22	82
1	30-025-00016	Apache Argo 007	L .	15	215	270	2210 FSL & 000 FWL	110		na	i id	lia
	30-025-09915	Apache Argo 007	L .	15	215	378	2310 FSL & 990 FWL	10		IId	Ha	IId
1	30-025-09916	Apache NEDU 701	L	15	21s	37e	1980 FSL & 660 FWL	no		na	na	na
1	30-025-34888	Apache NEDU 713	L	15	21s	37e	1330 FSL & 1142 FWL	no		na	na	na
1	30-025-37238	Apache NEDU 629	L	15	21s	37e	2630 FSL & 330 FWL	yes	1	no	Will check if critical radius approaches	Will check if critical radius approaches
0	30-025-42232 (Withdrawn)	Apache NEDU 639	L	15	21s	37e	1960 FSL & 740 FWL	no		na	na	na
1	30-025-06623	Apache WBDU 057	A	16	21s	37e	660 FNL & 660 FEL	yes	1	no	Will check if critical radius approaches	Will check if critical radius approaches
1	30-025-25198	Chevron HI NCT 006	А	16	215	37e	330 FNL & 600 FFL	no		no	na	na
1	30-025-39277	Apache WBDU 113	A	16	215	37e	1290 FNI & 330 FFI	ves*	1 1	ves	ves	no
								,		,	,	
1	20.025.04421	Anosho WRDU 054		14	210	270	1000 ENIL # 440 EEI	1000	4		Mill about if aritical radius approaches	Will about if oritical radius on a state
1	30-025-00021	Chauran LILNCT 005		10	215	378	1760 FINE & 000 FEL	yes	1	10	Will about if critical radius approaches	Will abook if aritical radius approaches
	30-025-06624	Chevron HEINCT 005	н	10	215	37e	ZSTUFINE & 330 FEL	yes	1	no	will check it critical radius approaches	will check it critical radius approaches
1	30-025-36741	Chevron HLNCT 007	н	16	21s	37e	1330 FNL & 1070 FEL	no		na	na	na
1	30-025-37834	Chevron HLNCT 008	н	16	21s	37e	2310 FNL & 030 FEL	yes	1	no	Will check if critical radius approaches	Will check if critical radius approaches
0	30-025-42537 (Proposed)	Apache WBDU 164	Н	17	21s	37e	2610 FNL & 300 FEL	Yes	0 0	yes	Well P&A	Well P&A
1	30-025-06617	Apache St. DA 005	1	16	21s	37e	1980 FSL & 330 FEL	no		na	na	na
1	30-025-06619	Apache WBDU078	1	16	21s	37e	1980 FSL & 660 FFI	no		na	na	na
1	30-025-37916	Anache St. DA 013	i	16	215	376	1650 ESL & 780 FEL	no		na	na	na
	30-023-37710	Apacito St. DA 013		10	213	370		10		na	nu	Hu

4 18

44 Total # of wells in adjacent quarter-sections

4 Total # of wells in 1/4 mile AOR
 4 Total # of wells that are or have become within 800 ft of the outside radius of the brine well.

Notes:
* Means the well is within the calculated Critical outside radius of the brine well and casing program will be checked annually. The Critical Radius of Review is 10x the calculated brine well radius. ** API # 30-025-37223 not drilled too close to Brine Well "+++checked casing 1000 sks for 714 ft3 ok between 7-5/8 and 5.5 covers salt section



Field Notes: Last two or three well digits are the last number for the Well API#.
Appendix D-

• 2016-2017 MIT

Office	State of New Mexico	Form C-103
District I - (575) 393-6161	Energy, Minerals and Natural Resources	Revised July 18, 2013
625 N. French Dr., Hobbs, NM 88240		30-025-33547
11 S. First St., Artesia, NM 88210	OIL CONSERVATION DIVISION	5. Indicate Type of Lease
intict III - (505) 334-6178	1220 South St. Francis Dr.	STATE FEB
istrict IV - (505) 476-3460	Santa Fe, NM 87505	6. State Oil & Gas Lease No.
220 S. St. Francis Dr., Santa Fe, NM 1505		28411
SUNDRY NOTIO	CES AND REPORTS ON WELLS	7. Lease Name or Unit Agreement Name
XO NOT USE THIS FORM FOR PROPOS. IFFERENT RESERVOIR. USE "APPLIC. ROPOSALS.)	ALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A ATION FOR PERMIT" (FORM C-101) FOR SUCH	State S
. Type of Well: Oil Well	Gas Well D Other	8. Well Number OO)
Name of Operator Lev Energy Ser	rvices, Lh(9. OGRID Number
G-Desta Dr. Ste	4300 Milland, TX 79705	10. Pool name or Wildcat
Well Location	1.34 c) fort from the North line and	330 Feet from the whent line
Section 15	Townshin 215 Range 37F	NMPM County / F#
Section	11. Elevation (Show whether DR. RKB. RT. GR. e.	tc.)
	GL Elevation 345	8
12. Check A	ppropriate Box to Indicate Nature of Notic	e, Report or Other Data
NOTICE OF IN	TENTION TO: SU	IBSEQUENT REPORT OF:
ULL OK ALTER CASING	MULTIPLE COMPL	
		C
		Cavern MIT
CLOSED-LOOP SYSTEM		Cavern MIT D Condition of goorgual D
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OCD Condition of Approval

Mr. Houston, et al.:

OCD hereby requires that Key Energy Services, LLC (Key) conduct within 30-days of receipt of this Form, a Cavern MIT with pressure up to at least 200 psig for at least 4 hrs. recorded on a calibrated chart (within past 90 days) recorder with not greater than a 500 lb. spring. The start of the MIT shall be witnessed by OCD Hobb Field Staff. The intent of this test is to verify that the cavern has healed or whether there may be an external MIT problem with the well.

You may contact Mr. Mark A. Whitaker at the OCD Hobbs District Office at (575) 393-6161 Ext. #120 or Cell at (575) 399-3202.

Please acknowledge receipt of this message and provide Key's schedule for completing the above.

OCD appreciates Key's cooperation in this matter.

Please contact Mark A. Whitaker if you have questions. Thank you.

	BSI	Big Spring Instrumen	t, Inc.		
540 Big	9 N. Service Road Spring, TX 79720 432) 267-7185				
	CALIBRAT	ION REPORT	<u>r</u>		
pe Instrument: 202	4 17AR	tori 9	INGLER	EX	
nufacturers MANYo	16				
del Numbers 13.51	#57			a ta prosesso	
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REMARKSI

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Office	State of New Mexico	Form C-10
District I - (575) 393-6161 1625 N. Franch Dr., Hobbs, NM 88240	Energy, Minerals and Natural Keso	WELL API NO.
District II - (575) 748-1283 811 S. First St., Artesis, NM 88210	OIL CONSERVATION DIVIS	SION 5. Indicate Type of Leave
District III - (505) 334-6178 1000 Rio Brazos Rd., Aztec, NM 87410	1220 South St. Francis Dr.	STATE FEE
District IV - (505) 476-3460	2011 Santa Fe, NM 8/505	6. State Oil & Gas Lease No.
87505		28411
DIFFERENT RESERVOR USE "APP	TICES AND REPORTS ON WELLS POSALS TO DRILL OR TO DEEPEN OR FLUG BACK LICATION FOR PERMIT" (PORM C-101) FOR SUCH	TO A 7. Lease Name or Unit Agreement Name
PROPOSALS.)		8. Well Number con /
1. Type of well: On well 2. Name of Operator	Gas well M Other	9. OGRID Number
Key	Energy Services, L	LC
3. Address of Operator	ve Suite 4300 Midland	10. Pool name or Wildcat
4. Well Location	7970	5
Unit Letter P	Taugchin 2/5 Page 3	he and <u>SO</u> feet from the <u></u> ine
Section 75	11. Elevation (Show whether DR, RKB, R	T, GR, etc.)
a seat a second	G1 3458	
12. Check	Appropriate Box to Indicate Nature o	f Notice, Report or Other Data
NOTICE OF		
PERFORM REMEDIAL WORK		DIAL WORK
TEMPORARILY ABANDON	CHANGE PLANS COMM	MENCE DRILLING OPNS. PANDA
PULL OR ALTER CASING	MULTIPLE COMPL CASIN	IG/CEMENT JOB
DOWNHOLE COMMINGLE		
CLOSED-LOOP SYSTEM	NO MTT POTHE	B
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13. Describe proposed or con of starting any proposed proposed completion or r Spud Date: I hereby certify that the information SIGNATURE way block Type or print name Jerry Way For State Use Only APPROVED BY: Conditions of Approval (if ary):	Rig Release Date:	y knowledge and belief. Service System DATE 1/10/2013 when the primer DATE 1/10/2013

OCD Condition of Approval

Mr. Houston, et al.:

OCD hereby requires that Key Energy Services, LLC (Key) conduct within 30-days of receipt of this Form, a Cavern MIT with pressure up to at least 200 psig for at least 4 hrs. recorded on a calibrated chart (within past 90 days) recorder with not greater than a 500 lb. spring. The start of the MIT shall be witnessed by OCD Hobb Field Staff. The intent of this test is to verify that the cavern has healed or whether there may be an external MIT problem with the well.

You may contact Mr. Mark A. Whitaker at the OCD Hobbs District Office at (575) 393-6161 Ext. #120 or Cell at (575) 399-3202.

Please acknowledge receipt of this message and provide Key's schedule for completing the above.

OCD appreciates Key's cooperation in this matter.

Please contact Mark A. Whitaker if you have questions. Thank you.



American Valve & Meter, Inc.

1113 W. BROADWAY

P.O. BOX 166 HOBBS, NM 88240

T0: Key Energy

DATE:07/20/16

This is to certify that:

I, Tony Flores, Technician for American Valve & Meter Inc. has checked the calibration of the following instrument.

8" Pressure recorder

Ser# 1G53214

at these points.

Pressure #		* Pressure #			
Test - 0	Found -	Left - 0	Test	Found	Left -
- 500	- S	- 500	-	-	-
- 700	- A	- 700	-	-	-
- 1000	- M	- 1000	-	-	-
- 200	- E	- 200	-	-	-
- 0	-	- 0	-	-	-

Remarks:

Signature: Jay R

Chavez, Carl J, EMNRD

From:	Chavez, Carl J, EMNRD
Sent:	Tuesday, January 3, 2017 8:41 AM
То:	Houston, Ken; 'Jackson, Jerry'; Boone, Teresa
Cc:	Catanach, David, EMNRD; Griswold, Jim, EMNRD; Brown, Maxey G, EMNRD; Whitaker, Mark A, EMNRD
Subject:	BW-28 Key Energy Services, L.L.C. State Well #1 (API# 30-025-33547): Casing MIT Pass on 12/27/2016

Mr. Houston, et al.:

The New Mexico Oil Conservation Division (OCD) witnessed the recent above subject MIT, and the well passed the test. Please submit the C-103 Form for the MIT, original MIT chart, and copy of chart calibration sheet to me in order to update the administrative record within 7-days of receipt of this message.

OCD hereby allows Key Energy Services, LLC to resume brine production operations. OCD is also evaluating the formation leak-off problem from the prior Formation MIT, and may require additional testing and/or information.

Please contact me if you have questions. Thank you.

Mr. Carl J. Chavez New Mexico Oil Conservation Division Energy Minerals and Natural Resources Department 1220 South St Francis Drive Santa Fe, New Mexico 87505 Ph. (505) 476-3490 E-mail: <u>CarlJ.Chavez@state.nm.us</u>

"Why not prevent pollution, minimize waste to reduce operating costs, reuse or recycle, and move forward with the rest of the Nation?" (To see how, go to: http://www.emnrd.state.nm.us/OCD and see "Publications")

From: Griswold, Jim, EMNRD
Sent: Thursday, December 15, 2016 3:50 PM
To: Catanach, David, EMNRD <David.Catanach@state.nm.us>; Brown, Maxey G, EMNRD
<MaxeyG.Brown@state.nm.us>; Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>
Subject: FW: State S Brine

From: Houston, Ken [mailto:KHouston@keyenergy.com]
Sent: Thursday, December 15, 2016 3:48 PM
To: Griswold, Jim, EMNRD <<u>Jim.Griswold@state.nm.us</u>>
Cc: Jackson, Jerry <<u>jjackson05@keyenergy.com</u>>; Coligan, Maren <<u>mcoligan@keyenergy.com</u>>; Aqueron, Rene
<<u>raqueron@keyenergy.com</u>>
Subject: State S Brine

December 15, 2016 Dear Mr. Griswold, Key's State S brine well has been shut in. No water is being injected and no brine produced from the cavern. Key will resume contact with the area OCD office to provide notice prior to performing the casing MIT.

Best regards,

Ken Houston | Key Energy Services, LLC Vice President QHSE and SWD Operations 1301 McKinney Street, Suite 1800, Houston, TX 77010 o: 713.757.5512 | c: 713.419.3908 | e: khouston@keyenergy.com Doing it the right way. The Key Way. Every time.

Please consider the environment before printing this email

Chavez, Carl J, EMNRD

From:	Griswold, Jim, EMNRD
Sent:	Thursday, December 15, 2016 3:50 PM
То:	Catanach, David, EMNRD; Brown, Maxey G, EMNRD; Chavez, Carl J, EMNRD
Subject:	FW: State S Brine

From: Houston, Ken [mailto:KHouston@keyenergy.com]
Sent: Thursday, December 15, 2016 3:48 PM
To: Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>
Cc: Jackson, Jerry <jjackson05@keyenergy.com>; Coligan, Maren <mcoligan@keyenergy.com>; Aqueron, Rene
<raqueron@keyenergy.com>
Subject: State S Brine

December 15, 2016 Dear Mr. Griswold, Key's State S brine well has been shut in. No water is being injected and no brine produced from the cavern. Key will resume contact with the area OCD office to provide notice prior to performing the casing MIT.

Best regards,

Ken HoustonKey Energy Services, LLCVice President QHSE and SWD Operations1301 McKinney Street, Suite 1800, Houston, TX 77010o: 713.757.5512c: 713.419.3908e: khouston@keyenergy.comDoing it the right way. The Key Way. Every time.

Please consider the environment before printing this email

Chavez, Carl J, EMNRD

From:	Chavez, Carl J, EMNRD
Sent:	Friday, December 2, 2016 10:15 AM
То:	'Jackson, Jerry'; Boone, Teresa
Cc:	Whitaker, Mark A, EMNRD; Fortner, Kerry, EMNRD; Brown, Maxey G, EMNRD; Griswold, Jim, EMNRD
Subject:	BW-28 Key Energy Services, L.L.C. State Well #1 (API# 30-025-33547): Cavern MIT Reschedule

Mr. Jackson, et al.:

Good morning. The New Mexico Oil Conservation Division (OCD) is following up on our phone call this morning. There is one key change requiring a Casing MIT instead of a Cavern MIT from this morning's communication.

Key Energy Services, LLC (Key) experienced difficulty pressuring up to the 300 psi MIT pressure this morning. On Thursday (12/1), pressure in the cavern would not exceed ~ 280 psi. OCD believed that the salt cavern was fractured, and requires time to heal. However, the cavern bled off overnight to 240 psi, which is a very significant reduction in pressure. Historical Cavern MITs have been successfully run as high as 350 psi. Consequently, OCD is concerned this may be more than a cavern fracture scenario, and more likely a casing issue.

Therefore, OCD requires Key to reschedule a Casing MIT (300 psi for 30 min. +/- 10% pass/fail) within the next 90 days. A packer should be set within 50 ft. or less from the casing shoe depth.

Also, on a side note, OCD has noticed pressuring up on the mature cavern with fluid has taken a longer period of time, and Key may want to consider nitrogen gas for future Cavern MITs where the pressure up time would be minimal. Let's see if we can get past this EPA 5-Yr. MIT with the Casing MIT.

Please contact Mark A. Whitaker with the OCD Hobbs District Office to reschedule the Casing MIT. Thank you.

Mr. Carl J. Chavez New Mexico Oil Conservation Division Energy Minerals and Natural Resources Department 1220 South St Francis Drive Santa Fe, New Mexico 87505 Ph. (505) 476-3490 E-mail: <u>CarlJ.Chavez@state.nm.us</u>

"Why not prevent pollution, minimize waste to reduce operating costs, reuse or recycle, and move forward with the rest of the Nation?" (To see how, go to: http://www.emnrd.state.nm.us/OCD and see "Publications")

Griswold, Jim, EMNRD

From: Sent:	Griswold, Jim, EMNRD Tuesday, July 30, 2013 1:58 PM
To:	'wayne price'
Cc:	Mike Slaughter; Brian Kenne; Gonzales, Elidio L, EMNRD; Whitaker, Mark A, EMNRD;
	Brown, Maxey G, EMNRD
Subject:	RE: Key Energy Eunice BW-28 5 year MIT

Please proceed with whatever arrangements must be made to facilitate the future testing. Be aware that the test as proposed will subject both the brine cavern and entry casing to pressure. If the combination is not able to sustain the static test pressure for the duration, then further testing will be needed to determine where any observable loss might be occurring. This may dictate removal of all tubing from the well, installation of a packer to isolate the well casing, and independent pressure testing. Thank you.

Jim Griswold

Senior Hydrologist EMNRD/Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505 505.476.3465 email: jim.griswold@state.nm.us

-----Original Message-----From: wayne price [mailto:wayneprice77@earthlink.net] Sent: Tuesday, July 30, 2013 9:10 AM To: Griswold, Jim, EMNRD Cc: Mike Slaughter; Brian Kenne Subject: Key Energy Eunice BW-28 5 year MIT

Dear Jim,

Pursuant to our meeting in Santa Fe the other day, we would like to officially request that our next 5 year MIT, (schedule 2014) Key would be able to use the normal open to formation pressure test using either nitrogen or water, pressure up to approximately 300 psig, use a conventional chart recorder calibrated for 0-500 psig, use a maximum of 12 hour clock, hold pressure for 4 hours.

Please advise so we can make proper arrangements.

Wayne Price

Appendix E- Subsidence Reports







P.O. BOX 393 - 310 W. TAYLOR HOBBS, NEW MEXICO - 575-393-9146

Survey Date: 06/21/17	Sheet 2 o	f 2 Sheets
W.O. Number: 170621MS	Drawn By: KA	Rev:
Date: 06/21/17	170621MS	Scale:1"=1000'





From: "Griswold, Jim, EMNRD" <Jim.Griswold@state.nm.us>

- Subject: RE: Minor Modification Request- Key Energy NM Brine Wells Subsidence Monitoring BW-19 & BW-28
 - Date: February 2, 2015 1:27:52 PM MST
 - To: wayne price <wayneprice77@earthlink.net>
 - Cc: John Sanders
 sanders01@keyenergy.com>, Brad Stauffer <bstauffer@keyenergy.com>, Bobby Sisson <bsisson@keyenergy.com>, Dan Gibson <dgibson@keyenergy.com>

Approved. Please retain this email as no hardcopy will be sent. Thanks.

Jim Griswold Environmental Bureau Chief EMNRD/Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505 505.476.3465 email: jim.grswold@state.nm.us

----Original Message-----From: wayne price [mailto:wayneprice77@earthlink.net] Sent: Monday, February 02, 2015 1:11 PM To: Griswold, Jim, EMNRD Cc: John Sanders; Brad Stauffer; Bobby Sisson; Dan Gibson Subject: Minor Modification Request- Key Energy NM Brine Wells Subsidence Monitoring BW-19 & BW-28

Dear Jim,

This is to confirm our permit requirements for performing the required monitoring for Key's Brine well operations. The Carlsbad and Eunice Brine Well Subsidence Surveys have been completed. In order to satisfy and catch-up from the missed surveys, we are working with the previous surveyor to establish the original baselines.

Per our most recent communication, I fully understand your concern, thus we will agreed to perform 4 consecutive quarters in order to reestablished a baseline. Of course we have performed site visual surveys which will be noted in the annual report.

I had submitted a minor modification when we submitted the last annual report. It basically requested we be allowed to send the required surveys and a summary in the annual report. We also committed to an immediate notification if we saw a significant change, or a progressing trend.

We respectfully request approval.

Wayne Price-Price LLC

Appendix "F"

2017 Annual Report BW-28 Key Energy Closure Cost

Key Energy Rig	\$0 In-house
Halliburton Cement Job	\$15,000.00
Post Subsidance Monitoring 5 years	\$10,000.00
Tank Removal, Pad Clean-Up	\$50,000.00
Consulting fees	\$15,000.00
Total Estimate	\$90,000

Appendix G

• BW-28 Discharge Permit

State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez Governor

David Martin Cabinet Secretary

Brett F. Woods, Ph.D. Deputy Cabinet Secretary Jami Bailey Division Director Oil Conservation Division



November 8, 2013

Dan Gibson Key Energy Services, LLC. 6 Desta Drive, Suite 4300 Midland, Texas 79705

RE: Renewal of Discharge Permit BW-28 for the State Brine Well #1 in Unit E of Section 15, Township 21 South, Range 37 East NMPM; Lea County, New Mexico

Dear Mr. Gibson,

Pursuant to all applicable parts of the Water Quality Control Commission regulations 20.6.2 NMAC and more specifically 20.6.2.3104 thru.3999 discharge permit, and 20.6.2.5000 thru .5299 Underground Injection Control, the Oil Conservation Division hereby renews the discharge permit and authorizes operation and injection for the Key Energy Services, LLC (owner/operator) brine well associated with BW-28 (API# 30-025-33547) at the location described above and under the conditions specified in the attached Discharge Permit Approval Conditions.

Be advised that approval of this permit does not relieve the owner/operator of responsibility should operations result in pollution of surface water, groundwater, or the environment. Nor does this permit relieve the owner/operator of any responsibility or consequences associated with subsidence or cavern failure. This permit does not relieve the owner/operator of its responsibility to comply with any other applicable governmental rules or regulations.

If you have any questions, please contact Jim Griswold of my staff at (505) 476-3465 or by email at *jim.griswold@state.nm.us*. On behalf of the Oil Conservation Division, I wish to thank you and your staff for your cooperation and patience during this renewal application review.

Respectfully,

Jami Bailey Director

JB/JG/jg Attachment -- Discharge Permit Approval Conditions

cc: Michael Mariano, State Land Office

DISCHARGE PERMIT BW-28

1. GENERAL PROVISIONS:

1.A. PERMITTEE AND PERMITTED FACILITY: The Director of the Oil Conservation Division (OCD) of the Energy, Minerals and Natural Resources Department renews Discharge Permit BW-28 (Discharge Permit) to Key Energy Services, LLC. (Permittee) to operate its Underground Injection Control (UIC) Class III wells for the in situ extraction of salt (State Brine Well #1 – API No. 30-025-33547) located 1340 FNL and 330 FWL (SW/4 NW/4, Unit Letter E) in Section 15, Township 21 South, Range 37 East, NMPM, Lea County, New Mexico at its Brine Production Facility (Facility). The Facility is located approximately two miles north of Eunice, New Mexico along the east side of NM 207/CR 18.

The Permittee is permitted to inject water into the subsurface salt layers and produce brine for use in the oil and gas industry. Ground water that may be affected by a spill, leak, or accidental discharge occurs at a depth of approximately 60 feet below ground surface and has a total dissolved solids concentration of approximately 1,200 mg/L.

1.B. SCOPE OF PERMIT: OCD has been granted the authority by statute and by delegation from the Water Quality Control Commission (WQCC) to administer the Water Quality Act (Chapter 74, Article 6 NMSA 1978) as it applies to Class III wells associated with the oil and gas industry (See Section 74-6-4, 74-6-5 NMSA 1978).

The Water Quality Act and the rules promulgated pursuant to the Act protect ground water and surface water of the State of New Mexico by providing that, unless otherwise allowed by 20.6.2 NMAC, no person shall cause or allow effluent or leachate to discharge so that it may move directly or indirectly into ground water unless such discharge is pursuant to an approved discharge plan (See 20.6.2.3104 NMAC, 20.6.2.3106 NMAC, and 20.6.2.5000 through 20.6.2.5299 NMAC).

This Discharge Permit for a Class III well is issued pursuant to the Water Quality Act and WQCC rules, 20.6.2 NMAC. This Discharge Permit does not authorize any treatment of, or onsite disposal of, any materials, product, by-product, or oil-field waste.

Pursuant to 20.6.2.5004A NMAC, the following underground injection activities are prohibited:

- 1. The injection of fluids into a motor vehicle waste disposal well is prohibited.
- 2. The injection of fluids into a large capacity cesspool is prohibited.

3. The injection of any hazardous or radioactive waste into a well is prohibited except as provided by 20.6.2.5004A(3) NMAC.

4. Class IV wells are prohibited, except for wells re-injecting treated ground water into the same formation from which it was drawn as part of a removal or remedial action.

KEY ENERGY SERVICES, LLC. STATE BRINE WELL #1

5. Barrier wells, drainage wells, recharge wells, return flow wells, and motor vehicle waste disposal wells are prohibited.

This Discharge Permit does not convey any property rights of any sort nor any exclusive privilege, and does not authorize any injury to persons or property, any invasion of other private rights, or any infringement of state, federal, or local laws, rules or regulations.

The Permittee shall operate in accordance with the terms and conditions specified in this Discharge Permit to comply with the Water Quality Act and the rules issued pursuant to that Act, so that neither a hazard to public health nor undue risk to property will result (see 20.6.2.3109C NMAC); so that no discharge will cause or may cause any stream standard to be violated (see 20.6.2.3109H(2) NMAC); so that no discharge of any water contaminant will result in a hazard to public health, (see 20.6.2.3109H(3) NMAC); so that the numerical standards specified of 20.6.2.3103 NMAC are not exceeded; and, so that the technical criteria and performance standards (see 20.6.2.5000 through 20.6.2.5299 NMAC) for Class III wells are met. Pursuant to 20.6.2.5003B NMAC, the Permittee shall comply with 20.6.2.1 through 20.6.2.5299 NMAC.

The Permittee shall not allow or cause water pollution, discharge, or release of any water contaminant that exceeds the Water Quality Control Commission (WQCC) standards specified at 20.6.2.3101 NMAC and 20.6.2.3103 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams). Pursuant to 20.6.2.5101A NMAC, the Permittee shall not inject non-hazardous fluids into ground water having 10,000 mg/l or less total dissolved solids (TDS).

The issuance of this permit does not relieve the Permittee from the responsibility of complying with the provisions of the Water Quality Act, any applicable regulations or water quality standards of the WQCC, or any applicable federal laws, regulations or standards (See Section 74-6-5 NMSA 1978).

1.C. DISCHARGE PERMIT RENEWAL: This Discharge Permit is a permit renewal that replaces the permit being renewed. Replacement of a prior permit does not relieve the Permittee of its responsibility to comply with the terms of that prior permit while that permit was in effect.

1.D. DEFINITIONS: Terms not specifically defined in this Discharge Permit shall have the same meanings as those in the Water Quality Act or the rules adopted pursuant to the Act, as the context requires.

1.E. FILING FEES AND PERMIT FEES: Pursuant to 20.6.2.3114 NMAC, every facility that submits a Discharge Permit application for initial approval or renewal shall pay the permit fees specified in Table 1 and the filing fee specified in Table 2 of 20.6.2.3114 NMAC. OCD has already received the required \$100.00 filing fee. The Permittee is now required to submit the \$1,700.00 permit fee for a Class III well. Please remit payment made payable to the Water Quality Management Fund in care of OCD at 1220 South St. Francis Drive in Santa Fe, New Mexico 87505.

1.F. EFFECTIVE DATE, EXPIRATION, RENEWAL CONDITIONS, AND PENALTIES FOR OPERATING WITHOUT A DISCHARGE PERMIT: This Discharge Permit becomes effective 30 days from the date that the Permittee receives this discharge permit or until the permit is terminated or expires. This Discharge Permit will expire on **November 8, 2018.** The Permittee shall submit an application for renewal no later than 120 days before that expiration date, pursuant to 20.6.2.5101F NMAC. If a Permittee submits a renewal application at least 120 days before the Discharge Permit expires and is in compliance with the approved Discharge Permit, then the existing Discharge Permit will not expire until OCD has approved or disapproved the renewal application. A discharge permit continued under this provision remains fully effective and enforceable. Operating with an expired Discharge Permit may subject the Permittee to civil and/or criminal penalties (See Section 74-6-10.1 NMSA 1978 and Section 74-6-10.2 NMSA 1978).

1.G. MODIFICATIONS AND TERMINATIONS: The Permittee shall notify the OCD Director and OCD's Environmental Bureau of any Facility expansion or process modification (See 20.6.2.3107C NMAC). The OCD Director may require the Permittee to submit a Discharge Permit modification application pursuant to 20.6.2.3109E NMAC and may modify or terminate a Discharge Permit pursuant to Sections 74-6-5(M) through (N) NMSA 1978.

1. If data submitted pursuant to any monitoring requirements specified in this Discharge Permit or other information available to the OCD Director indicate that 20.6.2 NMAC is being or may be violated, then the OCD Director may require modification or, if it is determined by the OCD Director that the modification may not be adequate, may terminate this Discharge Permit for a Class III well that was approved pursuant to the requirements of 20.6.2.5000 through 20.6.2.5299 NMAC for the following causes:

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- Noncompliance by Permittee with any condition of this Discharge Permit;
- or,

b. The Permittee's failure in the discharge permit application or during the discharge permit review process to disclose fully all relevant facts, or Permittee's misrepresentation of any relevant facts at any time; or,

c. A determination that the permitted activity may cause a hazard to public health or undue risk to property and can only be regulated to acceptable levels by discharge permit modification or termination (See Section 75-6-6 NMSA 1978; 20.6.2.51011 NMAC; and, 20.6.2.3109E NMAC).

2. This Discharge Permit may also be modified or terminated for any of the following causes:

a. Violation of any provisions of the Water Quality Act or any applicable regulations, standard of performance or water quality standards;

b. Violation of any applicable state or federal effluent regulations or limitations; or

c. Change in any condition that requires either a temporary or permanent reduction or elimination of the permitted discharge (See Section 75-6-5M NMSA 1978).

1.H. TRANSFER OF CLASS III WELL DISCHARGE PERMIT:

1. The transfer provisions of 20.6.2.3111 NMAC do not apply to a discharge permit for a Class III well.

2. Pursuant to 20.6.2.5101H NMAC, the Permittee may request to transfer its Class III well discharge permit if:

a. The OCD Director receives written notice 30 days prior to the transfer date; and,

b. The OCD Director does not object prior to the proposed transfer date. OCD may require modifications to the discharge permit as a condition of transfer, and may require demonstration of adequate financial responsibility.

3. The written notice required in accordance with Permit Condition 1.H.2.a shall:

a. Have been signed by the Permittee and the succeeding Permittee, and shall include an acknowledgement that the succeeding Permittee shall be responsible for compliance with the Class III well discharge permit upon taking possession of the facility; and

b. Set a specific date for transfer of the discharge permit responsibility, coverage and liability; and

c. Include information relating to the succeeding Permittee's financial responsibility required by 20.6.2.5210B(17) NMAC.

1.I. COMPLIANCE AND ENFORCEMENT: If the Permittee violates or is violating a condition of this Discharge Permit, OCD may issue a compliance order that requires compliance immediately or within a specified time period, or assess a civil penalty, or both (See Section 74-6-10 NMSA 1978). The compliance order may also include a suspension or termination of this Discharge Permit. OCD may also commence a civil action in district court for appropriate relief, including injunctive relief (See Section 74-6-10(A)(2) NMSA 1978). The Permittee may be subject to criminal penalties for discharging a water contaminant without a discharge permit or in violation of a condition or omission of material fact in a renewal application, record, report, plan or other document filed, submitted or required to be maintained under the Water Quality Act; falsifying, tampering with or rendering inaccurate any monitoring device, method or record required to be maintained under the Water Quality Act; or failing to monitor, sample or report as required by a Discharge Permit issued pursuant to a state or federal law or regulation (See Section 74-6-10.2 NMSA 1978).

2. GENERAL FACILITY OPERATIONS:

2.A. QUARTERLY MONITORING REQUIREMENTS FOR CLASS III WELLS: The

Permittee may use either or both fresh water or water from otherwise non-potable sources. Pursuant to 20.6.2.5207C, the Permittee shall provide analysis of the injected fluids at least quarterly to yield data representative of their characteristics. The Permittee shall analyze the injected fluids for the following characteristics:

- pH;
- density;
- concentration of total dissolved solids; and,
- chloride concentration.

The Permittee shall also provide analysis of the produced brine on a quarterly basis. The Permittee shall analyze the produced brine for the following characteristics:

- pH;
- density;
- concentration of total dissolved solids;
- chloride concentration; and,
- sodium concentration.

2.B. SOLUTION CAVERN MONITORING PROGRAM:

1. Surface Subsidence Monitoring Plan: The Permittee shall submit a Surface Subsidence Monitoring Plan to OCD within 180 days of the effective data of this permit. The Surface Subsidence Monitoring Plan shall specify that the Permittee will install at least three survey monuments and shall include a proposal to monitor the elevation of the monuments at least semiannually.

The Permittee shall survey each benchmark at least semiannually to monitor for possible surface subsidence and shall tie each survey to the nearest USGS benchmark. The Permittee shall employ a licensed professional surveyor to conduct the subsidence monitoring program. The Permittee shall submit the results of all subsidence surveys to OCD within 15 days of the survey. If the monitored surface subsidence at any measuring point reaches 0.10 feet compared to its baseline elevation, then the Permittee shall suspend operation of the Class III well . If the Permittee cannot demonstrate the integrity of the cavern and well to the satisfaction of OCD, then it shall cease all brine production and submit a corrective action plan to mitigate the subsidence.

2. Solution Cavern Characterization Program: The Permittee shall submit a Solution Cavern Characterization Plan to characterize the size and shape of the solution cavern using geophysical methods within 180 days of the effective date of this permit. The Permittee shall characterize the size and shape of the solution cavern using a geophysical methods approved by OCD at least once before November 8, 2018. The Permittee shall demonstrate that at least 90% of the calculated volume of salt removed based upon injection and production volumes has been accounted for by the approved geophysical method(s) for such testing to be considered truly representative.

KEY ENERGY SERVICES, LLC. STATE BRINE WELL #1

a. The Permittee shall provide an estimate of the size and shape of the solution cavern at least annually, based on fluid injection and brine production data.

b. The Permit shall compare the ratio of the volume of injected fluids to the volume of produced brine monthly. If the average ratio of injected fluid to produced brine varies is less than 90% or greater than 110%, the Permittee shall report this to OCD and cease injection and production operations of its Class III well within 24 hours. The Permittee shall begin an investigation to determine the cause of this abnormal ratio within 72 hours. The Permittee shall submit to OCD a report of its investigation within 15 days of cessation of injection and production operations of its Class III well.

3. Annual Certification: The Permittee shall certify annually that continued salt solution mining will not cause cavern collapse, surface subsidence, property damage, or otherwise threaten public health and the environment, based on geologic and engineering data.

If the solution cavern is determined by either OCD or the Permittee to be potentially unstable by either direct or indirect means, then the Permittee shall cease all fluid injection and brine production within 24 hours. If the Permittee ceases operations because it or OCD has determined that the solution cavern is unstable, then it shall submit a plan to stabilize the solution cavern within 30 days. OCD may require the Permittee to implement additional subsidence monitoring and to conduct additional corrective action.

2.C. CONTINGENCY PLANS: The Permittee shall implement its proposed contingency plan(s) included in its Permit Renewal Application to cope with failure of a system(s) in the Discharge Permit.

2.D. CLOSURE: Prior to closure of the facility, the Permittee shall submit for OCD's approval, a closure plan including a completed form C-103 for plugging and abandonment of the Class III well. The Permittee shall plug and abandon its well pursuant to 20.6.2.5209 NMAC and as specified in Permit Condition 2.D.

1. **Pre-Closure Notification:** Pursuant to 20.6.2.5005A NMAC, the Permittee shall submit a pre-closure notification to OCD's Environmental Bureau at least 30 days prior to the date that it proposes to close or to discontinue operation of its Class III well. Pursuant to 20.6.2.5005B NMAC, OCD's Environmental Bureau must approve all proposed well closure activities before Permittee may implement its proposed closure plan.

2. **Required Information:** The Permittee shall provide OCD's Environmental Bureau with the following information:

- Name of facility;
- Address of facility;
- Name of Permittee (and owner or operator, if appropriate);
- Address of Permittee (and owner or operator, if appropriate);
- Contact person;
- Phone number;
- Number and type of well(s);

- Year of well construction;
- Well construction details;
- Type of discharge;
- Average flow (gallons per day);
- Proposed well closure activities (*e.g.*, sample fluids/sediment, appropriate disposal of remaining fluids/sediments, remove well and any contaminated soil, clean out well, install permanent plug, conversion to other type of well, ground water and vadose zone investigation, other);
- Proposed date of well closure;
- Name of Preparer; and,
- Date.

2.E. PLUGGING AND ABANDONMENT PLAN: Pursuant to 20.6.2.5209A NMAC, when the Permittee proposes to plug and abandon its Class III well, it shall submit to OCD a plugging and abandonment plan that meets the requirements of 20.6.2.3109C NMAC, 20.6.2.5101C NMAC, and 20.6.2.5005 NMAC for protection of ground water. If requested by OCD, Permittee shall submit for approval prior to closure, a revised or updated plugging and abandonment plan. The obligation to implement the plugging and abandonment plan as well as the requirements of the plan survives the termination or expiration of this Discharge Permit. The Permittee shall comply with 20.6.2.5209 NMAC.

2.F RECORD KEEPING: The Permittee shall maintain records of all inspections, surveys, investigations, *etc.*, required by this Discharge Permit at its Facility office for a minimum of five years and shall make those records available for inspection by OCD.

2.G. RELEASE REPORTING: The Permittee shall comply with the following permit conditions, pursuant to 20.6.2.1203 NMAC, if it determines that a release of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, has occurred. The Permittee shall report unauthorized releases of water contaminants in accordance with any additional commitments made in its approved Contingency Plan. If the Permittee determines that any constituent exceeds the standards specified at 20.6.2.3103 NMAC, then it shall report a release to OCD's Environmental Bureau.

1. Oral Notification: As soon as possible after learning of such a discharge, but in no event more than twenty-four (24) hours thereafter, the Permittee shall notify OCD's Environmental Bureau. The Permittee shall provide the following:

- The name, address, and telephone number of the person or persons in charge of the facility, as well as of the owner and/or operator of the facility;
- The name and location of the facility;
- The date, time, location, and duration of the discharge;
- The source and cause of discharge;
- A description of the discharge, including its chemical composition;
- The estimated volume of the discharge; and,

• Any corrective or abatement actions taken to mitigate immediate damage from the discharge.

2. Written Notification: Within one week after the Permittee has discovered a discharge, the Permittee shall send written notification (may use form C-141 with attachments) to OCD's Environmental Bureau verifying the prior oral notification as to each of the foregoing items and providing any appropriate additions or corrections to the information contained in the prior oral notification.

The Permittee shall provide subsequent written reports as required by OCD's Environmental Bureau.

2.H. OTHER REQUIREMENTS:

1. Inspection and Entry: Pursuant to Section 74-6-9 NMSA 1978 and 20.6.2.3107A NMAC, the Permittee shall allow any authorized representative of the OCD Director, to:

- Upon the presentation of proper credentials, enter the premises at reasonable times;
- Inspect and copy records required by this Discharge Permit;
- Inspect any treatment works, monitoring, and analytical equipment;
- Sample any injection fluid or produced brine; and,
- Use the Permittee's monitoring systems and wells in order to collect samples.

2. Advance Notice: The Permittee shall provide OCD's Environmental Bureau and Hobbs District Office with at least five (5) working days advance notice of any environmental sampling to be performed pursuant to this Discharge Permit, or any well plugging, abandonment or decommissioning of any equipment associated with its Class III well.

3. Environmental Monitoring: The Permittee shall ensure that any environmental sampling and analytical laboratory data collected meets the standards specified in 20.6.2.3107B NMAC. The Permittee shall ensure that all environmental samples are analyzed by an accredited "National Environmental Laboratory Accreditation Conference" (NELAC) Laboratory. The Permittee shall submit data summary tables, all raw analytical data, and laboratory QA/QC.

2.I. BONDING OR FINANCIAL ASSURANCE: Pursuant to 20.6.2.5210B(17) NMAC, the Permittee shall maintain at a minimum, a single well plugging bond in the amount that it shall determine, in accordance with Permit Condition 5.B, to cover potential costs associated with plugging and abandonment of the Class III well, surface restoration, and post-operational monitoring, as may be needed. OCD may require additional financial assurance to ensure adequate funding is available to plug and abandon the well and/or for any required corrective actions.

Methods by which the Permittee shall demonstrate the ability to undertake these measures shall include submission of a surety bond or other adequate assurances, such as financial statements or other materials acceptable to the OCD Director, such as: (1) a surety bond; (2) a trust fund with a New Mexico bank in the name of the State of New Mexico, with the State as Beneficiary; (3) a

non-renewable letter of credit made out to the State of New Mexico; (4) liability insurance specifically covering the contingencies listed in this paragraph; or (5) a performance bond, generally in conjunction with another type of financial assurance. If an adequate bond is posted by the Permittee to a federal or another state agency, and this bond covers all of the measures specified above, the OCD Director shall consider this bond as satisfying the bonding requirements of Sections 20.6.2.5000 through 20.6.2.5299 NMAC wholly or in part, depending upon the extent to which such bond is adequate to ensure that the Permittee will fully perform the measures required hereinabove.

2.J. ANNUAL REPORT: The Permittee shall submit its annual report pursuant to 20.6.2.3107 NMAC to OCD's Environmental Bureau by **June 1**st of the following year. The annual report shall include the following:

- Cover sheet marked as "Annual Class III Well Report, Name of Permittee, Discharge Permit Number, API number of well(s), date of report, and person submitting report;
- Summary of Class III well operations for the year including a description and reason for any remedial or major work on the well with a copy of form C-103;
- Monthly fluid injection and brine production volume, including the cumulative total carried over each year;
- Injection pressure data;
- A copy of the quarterly chemical analyses shall be included with data summary and all QA/QC information;
- Copy of any mechanical integrity test chart, including the type of test, *i.e.*, duration, gauge pressure, etc.;
- Brief explanation describing deviations from the normal operations;
- Results of any leaks and spill reports;
- An Area of Review (AOR) update summary;
- A summary with interpretation of MITs, surface subsidence surveys, cavern volume and geometry measurements with conclusion(s) and recommendation(s);
- A summary of the ratio of the volume of injected fluids to the volume of produced brine;
- A summary of all major Facility activities or events, which occurred during the year with any conclusions and recommendations;
- Annual Certification in accordance with Permit Condition 2.B.3.
- A summary of any new discoveries of ground water contamination with all leaks, spills and releases and corrective actions taken; and,
- The Permittee shall file its Annual Report in an electronic format with a hard copy submittal to OCD's Environmental Bureau.

3. CLASS III WELL OPERATIONS:

3.A. OPERATING REQUIREMENTS: The Permittee shall comply with the operating requirements specified in 20.6.2.5206A NMAC and 20.6.2.5206A NMAC to ensure that:

1. Injection will occur through the innermost tubing string and brine production through the annulus between the casing and tubing string to promote cavern development at depth. Injection and production flow can be reversed as required to achieve optimal cavern shaping, mine salt most efficiently, and to periodically clean the tubing and annulus. Injection must only occur in the intended solution mining interval.

2. Injection between the outermost casing and the well bore is prohibited in a zone other than the authorized injection zone. If the Permittee determines that its Class III well is discharging or suspects that it is discharging fluids into a zone or zones other than the permitted injection zone specified in Permit Condition 3.B.1., then the Permittee shall within 24 hours notify OCD's Environmental Bureau and Hobbs District Office of the circumstances and action(s) taken. The Permittee shall cease operations until proper repairs are made and it has received approval from OCD to re-start injection operations.

3.B. INJECTION OPERATIONS:

1. Well Injection Pressure Limit: The Permittee shall ensure that the maximum wellhead or surface injection pressure on its Class III well shall not exceed the fracture pressure of the injection salt formation and will not cause new fractures or propagate any existing fractures of cause damage to the system.

2. **Pressure Limiting Device:** The Permittee shall equip and operate its Class III well or system with a pressure limiting device which shall, at all times, limit surface injection pressure to the maximum allowable pressure for its Class III well. The Permittee shall monitor the pressure-limiting device daily and shall report all pressure exceedances within 24 hours of detecting an exceedance to OCD's Environmental Bureau.

The Permittee shall take all steps necessary to ensure that the injected fluids enter only the proposed injection interval and is not permitted to escape to other formations or onto the ground surface. The Permittee shall report to OCD's Environmental Bureau within 24 hours of discovery any indication that new fractures or existing fractures have been propagated, or that damage to the well, the injection zone, or formation has occurred.

3.C. CONTINUOUS MONITORING DEVICES: The Permittee shall use continuous monitoring devices to provide a record of injection pressure, flow rate, flow volume, and pressure on the annulus between the tubing and the long string of casing.

3.D. MECHANICAL INTEGRITY FOR CLASS III WELLS:

1. Pursuant to 20.6.2.5204 NMAC, the Permittee shall demonstrate mechanical integrity for its Class III well at least once every five years or more frequently as the OCD

Director may require for good cause during the life of the well. The Permittee shall demonstrate mechanical integrity for its Class III well every time it performs a well workover, including when it pulls the tubing. A Class III well has mechanical integrity if there is no detectable leak in the casing or tubing which OCD considers to be significant at maximum operating temperature and pressure; and no detectable conduit for fluid movement out of the injection zone through the well bore or vertical channels adjacent to the well bore which the OCD Director considers to be significant. The Permittee shall conduct a casing Mechanical Integrity Test (MIT) from the surface to the approved injection depth to assess casing integrity. The MIT shall consist of a 30-minute test at a minimum pressure of 300 psig measured at the surface.

The Permittee shall notify OCD's Environmental Bureau 5 days prior to conducting any MIT to allow OCD the opportunity to witness the MIT.

2. The following criteria will determine if the Class III well has passed the MIT:

a. Passes MIT if zero bleed-off during the test;

b. Passes MIT if final test pressure is within $\pm 10\%$ of starting pressure, if approved by OCD;

c. When the MIT is not witnessed by OCD and fails, the Permittee shall notify OCD within 24 hours of the failure of the MIT.

3. Pursuant to 20.6.2.5204C NMAC, the OCD Director may consider the use by the Permittee of equivalent alternative test methods to determine mechanical integrity. The Permittee shall submit information on the proposed test and all technical data supporting its use. The OCD Director may approve the Permittee's request if it will reliably demonstrate the mechanical integrity of the well for which its use is proposed.

4. Pursuant to 20.6.2.5204D NMAC, when conducting and evaluating the MIT(s), the Permittee shall apply methods and standards generally accepted in the oil and gas industry. When the Permittee reports the results of all MIT(s) to the OCD Director, it shall include a description of the test(s), the method(s) used, and the test results.

3.E. WELL WORKOVER OPERATIONS: Pursuant to 20.6.2.5205A(5) NMAC, the Permittee shall provide notice to and shall obtain approval from OCD's District Office in Hobbs and the Environmental Bureau in Santa Fe prior to commencement of any remedial work or any other workover operations to allow OCD the opportunity to witness the operation. The Permittee shall request approval using form C-103 (Sundry Notices and Reports on Wells) with copies sent to OCD's Environmental Bureau and Hobbs District Office. Properly completed Forms C-103 and/or C-105 must be filed with OCD upon completion of workover activities and copies included in that year's Annual Report.

3.K. FLUIDS INJECTION AND BRINE PRODUCTION VOLUMES AND

PRESSURES: The Permittee shall continuously monitor the volumes of water injected and brine production . The Permittee shall submit monthly reports of its injection and production volumes on or before the 10th day of the following month. The Permittee shall suspend injection if the monthly injection volume is less than 110% or greater than 120% of associated brine production. If such an event occurs, the Permittee shall notify OCD within 24 hours.

3.L. AREA OF REVIEW (AOR): The Permittee shall report within 72 hours of discovery any new wells, conduits, or any other device that penetrates or may penetrate the injection zone within a 1-mile radius from its Class III well.

4. CLASS V WELLS: Pursuant to 20.6.2.5002B NMAC, leach fields and other waste fluids disposal systems that inject non-hazardous fluid into or above an underground source of drinking water are UIC Class V injection wells. This Discharge Permit does not authorize the use of a Class V injection well for the disposal of industrial waste. Pursuant to 20.6.2.5005 NMAC, the Permittee shall close any Class V industrial waste injection well that injects non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes (*e.g.*, septic systems, leach fields, dry wells, *etc.*) within 90 calendar days of the issuance of this Discharge Permit. The Permittee shall document the closure of any Class V wells used for the disposal of non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes other than contaminated ground water in its Annual Report. Other Class V wells, including wells used only for the injection of domestic wastes, shall be permitted by the New Mexico Environment Department.

5. SCHEDULE OF COMPLIANCE:

5.A. ANNUAL REPORT: The Permittee shall submit its annual report to OCD by June 1st of each year.

5.B. BONDING OR FINANCIAL ASSURANCE: The Permittee shall submit an estimate of the minimum cost to properly close, plug and abandon its Class III well, conduct ground water restoration if applicable, and any post-operational monitoring as may be needed (see 20.6.2.5210B(17) NMAC) within 90 days of permit issuance (See 20.6.2.5210B(17) NMAC). The Permittee's cost estimate shall be based on third person estimates. After review, OCD will require the Permittee to submit a single well plugging bond based on the third person cost estimate.

5.C. **SURFACE SUBSIDENCE MONITORING PLAN:** The Permittee shall submit the Surface Subsidence Monitoring Plan required in accordance with Permit Condition 2.B.1 within 180 days of permit issuance.

5.D. SOLUTION CAVERN CHARACTERIZATION PLAN: The Permittee shall submit the Solution Cavern Characterization Plan required in accordance with Permit Condition 2.B.2 within 180 days of permit issuance.
Appendix H:

- Well Bore Sketch with Cavity Calculations, Radius, Diameter and D/H values.
- Cavern Characterization using New OCD Example Applied to BW-28.
 - o OCD E-mail.
 - Example of OCD Well Log + Cavern Layout.
 - BW-28 Cavern Superimposed on Nearby Well Log.
 - Mass Balance.



2017 Calculations

r=SqRtV(V*3/π*D)



From: "Chavez, Carl J, EMNRD" <CarlJ.Chavez@state.nm.us> Subject: RE: Key Eunice BW-28 Compliance letter response. Date: April 6, 2018 at 10:59:51 AM MDT To: Wayne Price <wayneprice@q.com>

Wayne:

E-mail for documentation by Price LLC April 7, 2018- Per C. Chavex-OCD can apply to Wasserhund wells BW-04 & BW-22 also.

Good morning. Please see attachment.

Thank you.

-----Original Message-----From: Wayne Price <wayneprice@q.com> Sent: Thursday, April 5, 2018 7:40 PM To: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us> Cc: Wayne Price <wayneprice@q.com> Subject: Re: Key Eunice BW-28 Compliance letter response.

Hi Carl,

What type of well Log?

On Apr 3, 2018, at 1:43 PM, Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us> wrote:

Mr. Price, et al.:

Good afternoon. The New Mexico Oil Conservation Division (OCD) is in receipt of the Key Energy Services letter (letter) dated March 30, 2018.

The letter was recently added to the above subject well administrative record.

OCD will consider the letter for the upcoming discharge permit renewal.

Regarding the workgroup for the cavern characterization, etc., OCD

is accepting the "cone" calculation with additional well log characterization supporting the calculation. Upon request, OCD can send you an example. Therefore, OCD does not believe a "study group" is necessary at this time; however, it will remain an option as OCD reviews the submittals, receives any new proposals, and seeks out any new scientific information on the subject.

Thank you.

Mr. Carl J. Chavez, CHMM (#13099) New Mexico Oil Conservation Division Energy Minerals and Natural Resources Department 1220 South St Francis Drive Santa Fe, New Mexico 87505 Ph. (505) 476-3490 E-mail: CarlJ.Chavez@state.nm.us "Why not prevent pollution, minimize waste to reduce operating costs, reuse or recycle, and move forward with the rest of the Nation?" (To see how, go to: http://www.emnrd.state.nm.us/OCD and see "Publications")

-----Original Message-----From: Wayne Price <wayneprice@q.com> Sent: Monday, April 2, 2018 12:26 PM To: Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>; Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us> Cc: Wayne Price <wayneprice@q.com>; Rick Graham <rgraham01@keyenergy.com> Subject: Key Eunice BW-28 Compliance letter response.

Dear Mr. Griswold and Mr. Chavez:

Please find attached a response letter to your February 16, 2018 letter requesting record information and a response by May 04, 2018. Price LLC, a consultant for Key Energy has already supplied the Annual Reports for the 2011-2016 years .

Please note this response has some Minor Modification requests.

Please note, you can evaluate them now, or you can wait until we submit the renewal permit application which is due 120 days before expiration of November 08, 2018 of this year.

Please file in the Key OCD BW-28 file. Please let us know if you received this correspondence.

Wayne Price-Price LLC 312 Encantado Ridge CT NE Rio Rancho, NM 87124 wayneprice@q.com 505-715-2809



V = (3.14159 * 143.07²) * (252') / 3 V = 5,401,648.6 ft.³

Est. hight is 252' Est. cavern floor diameter is 286.14'

BAKER HUGHES			CALIPER LOG HOBBS OCD								
FILE NO: COMPA		Y	APACHE	CORPORAT	ION	DN FED 2 4 2014					
MD10882	WELL		NEDU 54	4D							
API NO: FIEL			DRINKAF	RD		RECEIVED					
30-025-41600	COUNTY	COUNTY			STAT	ATE NEW MEXICO					
Ver. 3.87 FINAL PRINT)' FWL		OTHER SERVICES ZDL/CN/DSL DLL/MLL						
	SEC <u>15</u>		TWP <u>215</u>	<u>:</u>							
	G					ELEVATIONS:					
I OC MEASURED FROM			_ ELEVATIC			KB 3459 FT					
			13 F1	ABOVE P.D.		DF 3458 FT					
DRILL. MEAS. FROM	KELLY B					GL 3446 FT					
DATE		14-F	EB-2014								
RUN TRIP	RUN TRIP			1							
SERVICE ORDER			38								
DEPTH DRILLER			FT								
DEPTH LOGGER			FT		_						
BOTTOM LOGGED INTERVAL		6912	FT		_						
TOP LOGGED INTERVAL			FT		_						
				U 1269 FT		@					
			IE								
DENSITY VISCO		10 F	3/G	31 S		<u> </u>					
PH FLUI	DLOSS	8		13 C3							
SOURCE OF SAMPLE			ULATION TA	NK	1	······································					
RM AT MEAS. TEMP.			OHMM	80 DEGF		<u>@</u>					
RMF AT MEAS. TEMP.			OHMM (9 80 DEGF		<u>e</u>					
RMC AT MEAS. TEMP.			OHMM (80 DEGF		<u>@</u>					
SOURCE OF RMF RMC			CULATED	CALCULATED							
RM AT BHT			ОНММ	9 107 DEGF		@					
TIME SINCE CIRCULATION			OURS								
MAX. RECORDED TEMP.			DEGF								
EQUIP. NO. LOCATION			72	MIDLAND, TX							
RECORDED BY			MER								
WITNESSED BY			HE								





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					ļ						1					
		BW-28 Mass Balance								Independen	t Inputs					
		Measured Salt Removed vs Calculated Salt F				Removed			Formulas	Dependent '	Variables					
														L	I	
	2047					E 500 704	DDL			d	 					
	2017 year End total Production Volume			5,526,794	BRIS		Independent variable					ļ	<u> </u>			
]										
	Average	Density #	#/gal pro	duced wa	ater measured	9.92	lbs/gal		Indepen	dent var	able		Seven year A	verage		
	Average	Salt Dens	sity-Est			80	lbs/ft3		Indepen	dent vari	able		Used OCD nu	umber for salt	t density	
	FT3/bbl					7.35	ft3/bbl		Indepen	dent vari	able					
	LBs of sa	lt per gal				1.586	Lbs/gal		Depend	ent Varia	ble					
	LBs of Sa	lt per BB	L			87.23	Lbs/bbl		Depend	ent Varia	ble					
	Total LBs	s of Salt R	emoved			482,102,241	LBS		Depend	ent Varia	ble					
	Ft3 of sa	lt remove	ed			6,026,278	Ft3		Estimate	d Caverr	n Size calo	culated fr	om Prodi	uction Nu	umbers	
	Geo-Phy	sical Wor	st Case C	one Calc	ulation											
	V= ∏R2h	n/3														
	Radius Radius			79	ft		Dependent Variable						1			
	Height from Log			840 ft			Independent Variable									
	Volume of Worst Case Cone			5,487,087	5.487.087 Ft3 C			Calculated using "Worst Case Con								
	1											1			1	1
											1	1		ļ		L
							L					1		L	1	1
						<u>9%</u> Within 10 % Pa			isses		" Plus % = Means Cone Calulation is less than measured s				ured salt remo	oved
											1	1	L	L	1	L
1	1				1		1	1		1	Neg % = M	eans cone Ca	iculaton is mo	pre than meas	surea salt rem	love