

February 8, 2019

Mike Bratcher Oil Conservation Division, District 2 811 S First St. Artesia, NM 88210

Deborah McKinney Bureau of Land Management 620 E. Green St. Carlsbad, NM 88220

Re: COG Operating, LLC Deferment Request Burch Keely Unit Satellite G (11/12/18) RP#: 2RP-5052 GPS: 32.80903, -104.01178 Unit Letter F, Section 30, Township 17 South, Range 30 East Eddy County, New Mexico

Mr. Bratcher/Ms. McKinney,

COG Operating, LLC (COG) is pleased to submit the following deferment report in response to a release that occurred at the Burch Keely Unit Satellite G located in Unit Letter F, Section 30, Township 17 South and Range 30 East in Eddy County, New Mexico.

#### BACKGROUND

The release was discovered on November 12, 2018 and a C-141 initial report was submitted and approved by the New Mexico Oil Conservation Division (NMOCD). The initial C-141 is shown in Appendix A. The release occurred from a leaking fiberglass containment that captured leaking fluids from under the skid mount unit. The release was contained on location and a vacuum truck was used to remove all freestanding fluids. Approximately 2.5 barrels of oil and 2.5 barrels of produced water were released and recovered 0.5 barrels of oil and 0.5 barrels of produced water. The impacted area under the skid unit measured approximately 6.0' x 12.0'. A shallow scrape was performed under the skid unit but additional removal could not be performed due to access issues under the skid.

#### **GROUNDWATER AND REGULATORY FRAMEWORK**

According to the New Mexico Office of the State Engineer (NMOSE), reported a water well in Section 20 with groundwater depth of 80 feet below surface. The Chevron trend map show a depth to water >100 feet. The water well information is shown in Appendix B.

A risk based evaluation and site determinations were perform in accordance to the New Mexico Oil Conservation Division (NMOCD) Rule (Title 19 Chapter 15 Part 29) for releases on oil and gas development and production in New Mexico (effective August 14, 2018). According to the site characterization evaluation, no other receptors (water wells, playas, karst, water course, lake beds or ordinance boundaries) were located within each specific boundaries or distance from the site. The groundwater data and the site characterization evaluation data is summarized in Appendix B. The delineation and closure criteria are listed below:

#### **General Site Characterization and Groundwater:**

Site Characterization	Average Groundwater Depth (ft.)
None Encountered	50-100 feet

#### **Delineation and Closure Criteria:**

Remedial Action Levels (RALs)				
Chlorides	10,000 mg/kg			
TPH (GRO and DRO and MRO)	2,500 mg/kg			
TPH (GRO and DRO)	1,000 mg/kg			
Benzene	10 mg/kg			
Total BTEX	50 mg/kg			

#### **PROPOSED DEFERMENT**

Referring to Table 1, the benzene, total BTEX and chloride concentrations are below the closure criteria or Remedial Action Levels (RAL). However, the TPH did exceed and showed a shallow impact to the soil, but declined below the RAL at 1-1.5' below the excavation bottom. The skid mount unit cannot be moved from the area to properly perform the remediation. The impacted area under the skid measured approximately 6.0' x 12.0'. Due to the access issues, COG propose to defer the remaining impact under the skid. To aid the hydrocarbon degradation, a Micro-Blaze product will be applied to the area.

Should you have any questions or concerns on the proposed deferment, please do not hesitate to contact me.

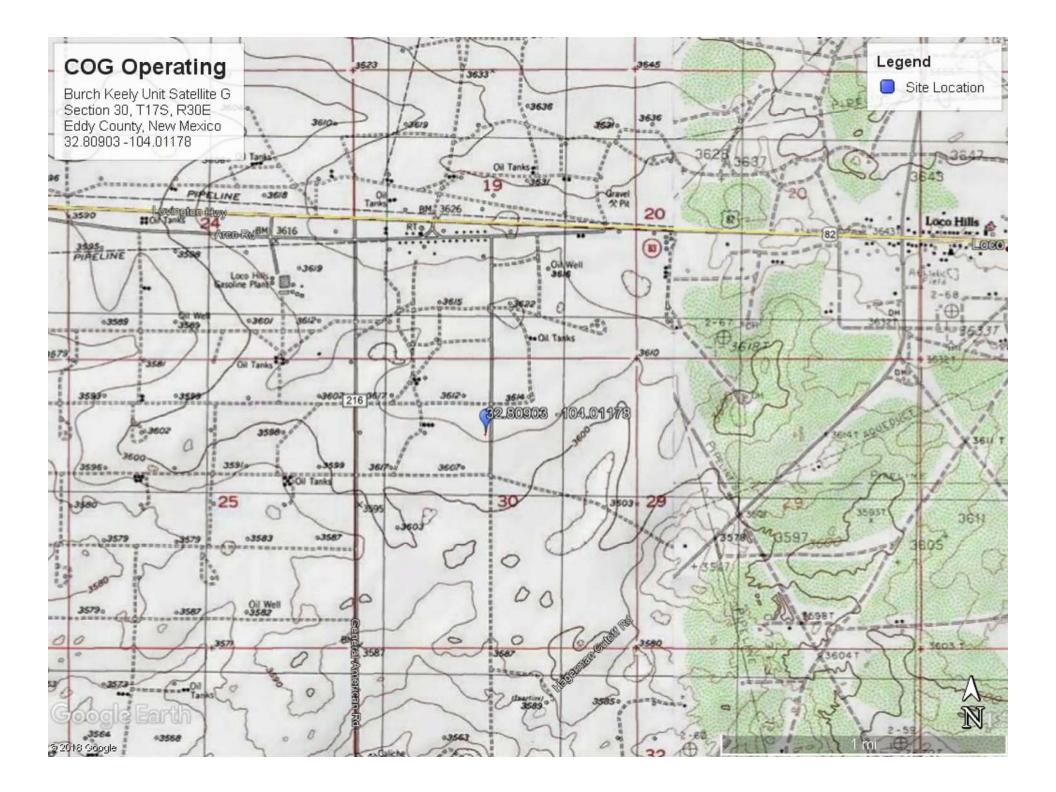
Sincerely, Concho Operating, LLC

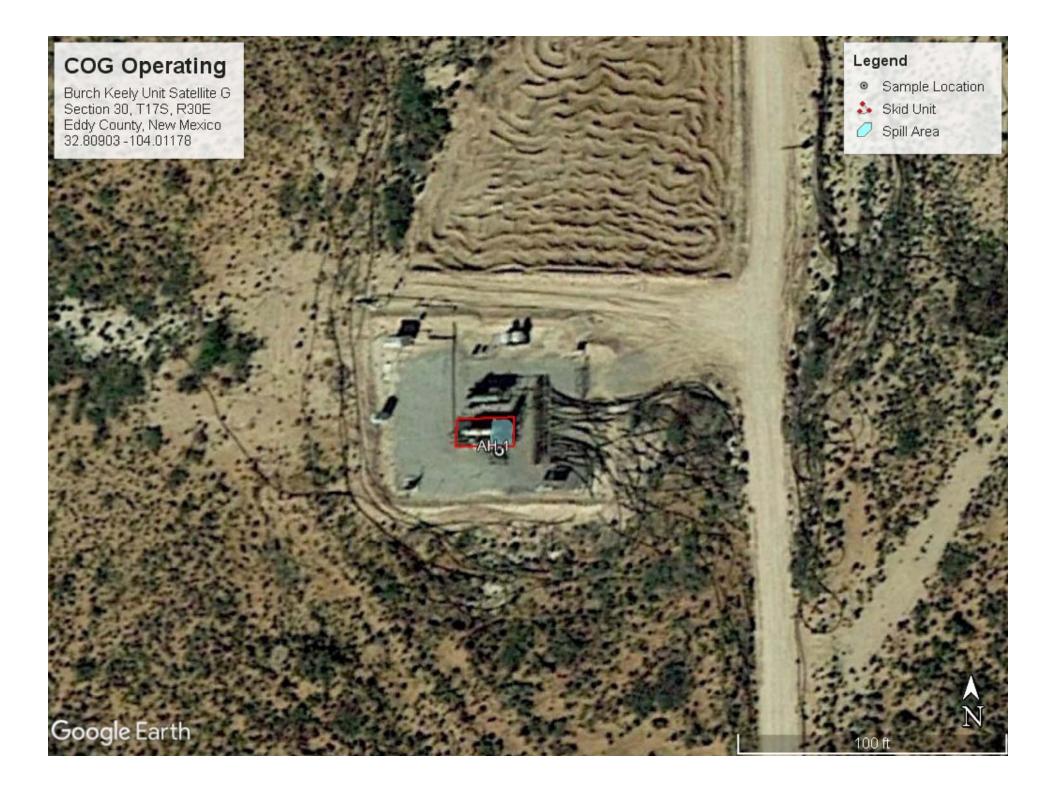
MR

Ike Tavarez, P. G. Senior HSE Supervisor itavarez@concho.com

CC:

# Figures







# Tables

#### Table 1 COG Operating LLC. Burch Keely Satellite G Eddy County, New Mexico

Soil S			status	TPH (mg/kg)						Total BTEX			
Sample ID Sample Date	Sample Date	In-Situ	Removed	GRO	DRO	MRO	Total	GRO	DRO	Total	Benzene (mg/kg)	(mg/kg)	Chloride (mg/kg)
Average Depth to Grou	ndwater (ft)	>50 -100'											
NMOCD Remedial Act	ion Levels (mg/kg)			-	-	-	2,500	-	-	1,000	10	50	10,000
AH-1 0-1'	11/27/2018	Х		62.4	3610	67.1	3740	62.4	3610	3,672.4	<0.00200	0.0187	516
AH-1 1-1-5'	11/27/2018	Х		<15.0	208	29.7	238	<15.0	208	208	< 0.00199	< 0.00199	469
AH-1 2-2.5'	11/27/2018	Х		<15.0	940	83.5	1020	<15.0	940	904	< 0.00200	< 0.00200	403
AH-1 3-3.5'	11/27/2018	Х		-	-	-	-	-	-	-	-	-	18.4
AH-1 4-4.5'	11/27/2018	Х		-	-	-	-	-	-	-	-	-	623
AH-1 5-5.5'	11/27/2018	Х		-	-	-	-	-	-	-	-	-	1260
	Proposed Deferment												

Not Analyzed

(-)

# Appendix A

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

State of New Mexico Energy Minerals and Natural Resources Department

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

)

Incident ID	
District RP	
Facility ID	
Application ID	

# **Release Notification**

#### **Responsible Party**

Responsible Party	OGRID
Contact Name	Contact Telephone
Contact email	Incident # (assigned by OCD)
Contact mailing address	

#### **Location of Release Source**

(NAD 83 in decimal degrees to 5 decimal places)

Site Name	Site Type
Date Release Discovered	API# (if applicable)

Unit Letter	Section	Township	Range	County

Surface Owner: State Federal Tribal Private (Name: \_

#### Nature and Volume of Release

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

Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	Yes No
Condensate	Volume Released (bbls)	Volume Recovered (bbls)
Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)
Cause of Release		
Cause of Release		

Page 2

#### State of New Mexico Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a main n	IFVEC for sub-t-manager (-) does the manager it is material within a main malager 2
Was this a major	If YES, for what reason(s) does the responsible party consider this a major release?
release as defined by	
19.15.29.7(A) NMAC?	
Yes No	
If YES, was immediate no	otice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?

### **Initial Response**

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

The source of the release has been stopped.

The impacted area has been secured to protect human health and the environment.

Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.

All free liquids and recoverable materials have been removed and managed appropriately.

If all the actions described above have not been undertaken, explain why:

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

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

Printed Name:	Title:
Signature:	Date:
email:	Telephone:
OCD Only	
Received by:	Date:

Form C-141 Page 3 State of New Mexico Oil Conservation Division

Incident ID	
District RP	2RP 5052
Facility ID	
Application ID	

## Site Assessment/Characterization

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

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

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

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

- Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- Field data
- Data table of soil contaminant concentration data
- $\square$  Depth to water determination
- Determination of water sources and significant watercourses within <sup>1</sup>/<sub>2</sub>-mile of the lateral extents of the release
- Boring or excavation logs
- Photographs including date and GIS information
- Topographic/Aerial maps
- Laboratory data including chain of custody

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

Form C-141	State of New Mexico		Г	Incident ID	
Page 4	Oil Conservation Division	Oil Conservation Division			2RP 5052
I uge 4	on conservation Division		-	District RP	2KF 3032
			-	Facility ID	
				Application ID	
regulations all operators as public health or the enviro failed to adequately invest addition, OCD acceptance and/or regulations. Printed Name: <u>Ike Tava</u>		fications and pe OCD does not re at to groundwat	erform cor elieve the o tter, surfact for complia	rective actions for rele operator of liability sh e water, human health ance with any other fe	eases which may endanger ould their operations have or the environment. In
Signature:	14 125	Date:	2/8/19		
email: <u>itavarez@concl</u>	ho.com 7	Felephone: <u>43</u>	32-683-74	443	
OCD Only					
Received by:		Date:	:		

Form C-141 Page 5 State of New Mexico Oil Conservation Division

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

Detailed description of proposed remediation technique

Incident ID	
District RP	2RP 5052
Facility ID	
Application ID	

# **Remediation Plan**

<ul> <li>Scaled sitemap with GPS coordinates showing delineation points</li> <li>Estimated volume of material to be remediated</li> <li>Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC</li> <li>Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)</li> </ul>
<b>Deferral Requests Only:</b> Each of the following items must be confirmed as part of any request for deferral of remediation.
Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
Extents of contamination must be fully delineated.
Contamination does not cause an imminent risk to human health, the environment, or groundwater.
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.
Printed Name: Ike Tavarez Title: Senior HSE Supervisor
Signature: 14 775 Date:2/8/19
email: i <u>tavarez@concho.com</u> Telephone: <u>432-683-7443</u>
OCD Only
Received by: Date:
Approved Approved with Attached Conditions of Approval Denied Deferral Approved
Signature: Date:

# Appendix B

2				U	State Engine Depth to	
(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)	(R=POD has been replaced, O=orphaned, C=the file is closed)	(quarters	s are 1=NW 2=NI s are smallest to la	,	83 UTM in meters)	(In feet)
POD Number	POD Sub- Code basin	-	Q Q 6 4 Sec Tws	Rng X	Y DepthWo	Water ellDepthWater Column
<u>RA 11914 POD1</u>	RA	ED 2 4	4 2 20 175	30E 594801	3632002 Average Depth to Water: Minimum Depth: Maximum Depth:	35 80 5 80 feet 80 feet 80 feet
Record Count: 1 PLSS Search: Township: 17S	Range: 30E					

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

2/7/19 5:49 PM

WATER COLUMN/ AVERAGE DEPTH TO WATER



National Water Information System: Web Interface
<u>USGS Water Resources</u>

USGS Home Contact USGS Search USGS

 Data Category:
 Geographic Area:

 Groundwater
 United States
 GO

Click to hideNews Bulletins

Please see news on new formats

• Full News 🔊

Groundwater levels for the Nation

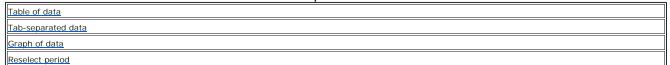
#### Search Results -- 1 sites found

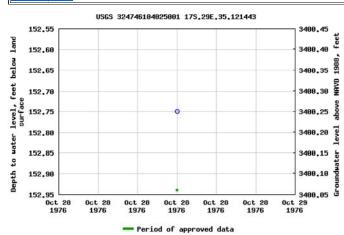
site\_no list = • 324746104025001

Minimum number of levels = 1 Save file of selected sites to local disk for future upload

#### USGS 324746104025001 17S.29E.35.121443

Available data for this site Groundwater: Field measurements Eddy County, New Mexico Hydrologic Unit Code --Latitude 32°47'46", Longitude 104°02'50" NAD27 Land-surface elevation 3,553 feet above NAVD88 This well is completed in the San Andres Limestone (313SADR) local aquifer. Output formats





Breaks in the plot represent a gap of at least one year between field measurements. Download a presentation-quality graph

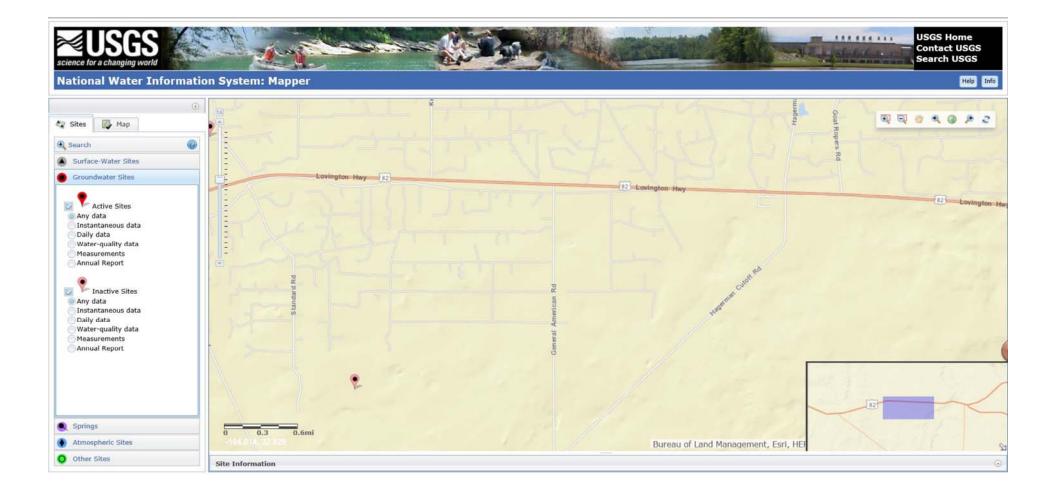
Questions about sites/data? Feedback on this web site Automated retrievals Help Data Tips Explanation of terms Subscribe for system changes News

 Accessibility
 Plug-Ins
 FOIA
 Privacy
 Policies and Notices

 U.S. Department of the Interior
 IU.S. Geological Survey
 Image: Comparison of the Interior
 Image: Comparison of the Interior

Title: Groundwater for USA: Water Levels URL: https://nwis.waterdata.usgs.gov/nwis/gwlevels?





# **Burch Keely Satellite G**

Section 30, T17S, R30E Eddy County, New Mexico 32.80903 -104.01178















© 2018 Google

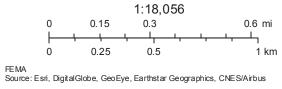
2000 ft

N

# New Mexico NFHL Data



February 8, 2019



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# Appendix C



Ike Tavarez

Eddy Co. NM

**Project Id:** 

**Project Location:** 

**Contact:** 

Certificate of Analysis Summary 607203

COG Operating LLC, Artesia, NM

Project Name: Burch Keely Satellite G Battery (11-12-18)



Date Received in Lab:Mon Dec-03-18 11:53 amReport Date:06-DEC-18Project Manager:Jessica Kramer

Lab Id: 607203-001 607203-002 607203-003 607203-004 607203-005 607203-006 Field Id: AH-1 0-1' AH-1 1-1-5' AH-1 2-2.5' AH-1 3-3.5 AH-1 4-4.5' AH-1 5-5.5' Analysis Requested Depth: Matrix: SOIL SOIL SOIL SOIL SOIL SOIL Nov-27-18 00:00 Nov-27-18 00:00 Sampled: Nov-27-18 00:00 Nov-27-18 00:00 Nov-27-18 00:00 Nov-27-18 00:00 BTEX by EPA 8021B Dec-05-18 10:30 Dec-05-18 10:30 Extracted: Dec-05-18 10:30 Analyzed: Dec-06-18 03:30 Dec-06-18 03:49 Dec-06-18 04:08 RL RL RL Units/RL: mg/kg mg/kg mg/kg < 0.00200 0.00200 < 0.00199 0.00199 < 0.00200 0.00200 Benzene Toluene 0.00390 0.00200 < 0.00199 0.00199 < 0.00200 0.00200 0.00362 0.00200 < 0.00199 0.00199 < 0.00200 0.00200 Ethylbenzene 0.00400 0.00398 0.00717 < 0.00398 < 0.00400 0.00400 m,p-Xylenes o-Xylene 0.00396 0.00200 < 0.00199 0.00199 < 0.00200 0.00200 0.0111 0.00200 < 0.00199 0.00199 < 0.00200 0.00200 Total Xylenes Total BTEX 0.0187 0.00200 < 0.00199 0.00199 < 0.00200 0.00200 Chloride by EPA 300 Extracted: Dec-03-18 17:00 Dec-03-18 17:00 Dec-03-18 17:00 Dec-03-18 17:00 Dec-03-18 17:00 Dec-03-18 17:00 Analyzed: Dec-04-18 04:24 Dec-04-18 04:30 Dec-04-18 04:36 Dec-04-18 05:01 Dec-04-18 05:07 Dec-04-18 08:29 Units/RL: mg/kg RL mg/kg RL mg/kg RL mg/kg RL mg/kg RL mg/kg RL Chloride 516 5.00 469 4.95 403 5.00 18.4 4.96 623 4.96 1260 25.0 TPH By SW8015 Mod Extracted: Dec-03-18 14:00 Dec-03-18 14:00 Dec-03-18 14:00 Analyzed: Dec-04-18 07:38 Dec-04-18 07:57 Dec-04-18 08:16 Units/RL: mg/kg RL mg/kg RL mg/kg RL Gasoline Range Hydrocarbons 62.4 15.0 <15.0 15.0 <15.0 15.0 3610 15.0 15.0 **Diesel Range Organics** 15.0 208 940 Motor Oil Range Hydrocarbons (MRO) 15.0 29.7 83.5 15.0 67.1 15.0 3740 238 1020 Total TPH 15.0 15.0 15.0

This analytical report, and the entire data package it represents, has been made for your exclusive and confidential use. The interpretations and results expressed throughout this analytical report represent the best judgment of XENCO Laboratories. XENCO Laboratories assumes no responsibility and makes no warranty to the end use of the data hereby presented. Our liability is limited to the amount invoiced for this work order unless otherwise agreed to in writing.

Houston - Dallas - Midland - Tampa - Phoenix - Lubbock - San Antonio - El Paso - Atlanta - New Mexico

Jession VRAMER

Jessica Kramer Project Assistant

Page 1 of 19

# Analytical Report 607203

for COG Operating LLC

**Project Manager: Ike Tavarez** 

Burch Keely Satellite G Battery (11-12-18)

#### 06-DEC-18

Collected By: Client





#### 1211 W. Florida Ave, Midland TX 79701

Xenco-Houston (EPA Lab Code: TX00122): Texas (T104704215-18-28), Arizona (AZ0765), Florida (E871002-24), Louisiana (03054) Oklahoma (2017-142)

> Xenco-Dallas (EPA Lab Code: TX01468): Texas (T104704295-18-17), Arizona (AZ0809), Arkansas (17-063-0)

Xenco-El Paso (EPA Lab Code: TX00127): Texas (T104704221-18-14) Xenco-Lubbock (EPA Lab Code: TX00139): Texas (T104704219-18-18) Xenco-Midland (EPA Lab Code: TX00158): Texas (T104704400-18-18) Xenco-San Antonio (EPA Lab Code: TNI02385): Texas (T104704534-18-4) Xenco Phoenix (EPA Lab Code: AZ00901): Arizona (AZ0757) Xenco-Phoenix Mobile (EPA Lab Code: AZ00901): Arizona (AZM757) Xenco-Atlanta (LELAP Lab ID #04176) Xenco-Tampa: Florida (E87429) Xenco-Lakeland: Florida (E84098)



06-DEC-18



Project Manager: **Ike Tavarez COG Operating LLC** 2407 Pecos Avenue Artesia, NM 88210

#### Reference: XENCO Report No(s): **607203 Burch Keely Satellite G Battery (11-12-18)** Project Address: Eddy Co. NM

#### Ike Tavarez:

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the XENCO Report Number(s) 607203. All results being reported under this Report Number apply to the samples analyzed and properly identified with a Laboratory ID number. Subcontracted analyses are identified in this report with either the NELAC certification number of the subcontract lab in the analyst ID field, or the complete subcontracted report attached to this report.

Unless otherwise noted in a Case Narrative, all data reported in this Analytical Report are in compliance with NELAC standards. The uncertainty of measurement associated with the results of analysis reported is available upon request. Should insufficient sample be provided to the laboratory to meet the method and NELAC Matrix Duplicate and Matrix Spike requirements, then the data will be analyzed, evaluated and reported using all other available quality control measures.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by XENCO Laboratories. This report will be filed for at least 5 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in Report No. 607203 will be filed for 45 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting XENCO Laboratories to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

Jession KRAMER

Jessica Kramer Project Assistant

Recipient of the Prestigious Small Business Administration Award of Excellence in 1994. Certified and approved by numerous States and Agencies. A Small Business and Minority Status Company that delivers SERVICE and QUALITY

Houston - Dallas - Midland - San Antonio - Phoenix - Oklahoma - Latin America



#### Sample Id

AH-1 0-1'
AH-1 1-1-5'
AH-1 2-2.5'
AH-1 3-3.5'
AH-1 4-4.5'
AH-1 5-5.5'

## Sample Cross Reference 607203



## COG Operating LLC, Artesia, NM

Matrix	Date Collected	Sample Depth	Lab Sample Id
S	11-27-18 00:00		607203-001
S	11-27-18 00:00		607203-002
S	11-27-18 00:00		607203-003
S	11-27-18 00:00		607203-004
S	11-27-18 00:00		607203-005
S	11-27-18 00:00		607203-006



## CASE NARRATIVE

Client Name: COG Operating LLC Project Name: Burch Keely Satellite G Battery (11-12-18)

Project ID: Work Order Number(s): 607203 
 Report Date:
 06-DEC-18

 Date Received:
 12/03/2018

#### Sample receipt non conformances and comments:

None

Sample receipt non conformances and comments per sample:

None

Analytical non conformances and comments: Batch: LBA-3071838 BTEX by EPA 8021B Soil samples were not received in Terracore kits and therefore were prepared by method 5030.





## COG Operating LLC, Artesia, NM

Sample Id:         AH-1 0-1'           Lab Sample Id:         607203-001		Matrix: Date Colle	Soil cted: 11.27.	18 00.00	Ľ	Date Received:12.0	03.18 11.5	3
Analytical Method: Chloride by EPA Tech: CHE Analyst: CHE Seq Number: 3071575	A 300	Date Prep:	12.03.	18 17.00	%	rep Method: E30 5 Moisture: 8asis: We	)0P t Weight	
Parameter	Cas Number	Result	RL		Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	516	5.00		mg/kg	12.04.18 04.24		1
Analytical Method: TPH By SW801 Tech: ARM Analyst: ARM Seq Number: 3071595	5 Mod	Date Prep:	12.03.	18 14.00	%	rep Method: TX 5 Moisture: 8asis: We	1005P t Weight	
Tech: ARM Analyst: ARM	5 Mod Cas Number	Date Prep: Result	12.03. RL	18 14.00	%	5 Moisture:		Dil
Tech:ARMAnalyst:ARMSeq Number:3071595				18 14.00	% B	5 Moisture: Pasis: We	t Weight	<b>Dil</b>
Tech: ARM Analyst: ARM Seq Number: 3071595 Parameter	Cas Number	Result	RL	18 14.00	% B Units	Moisture: asis: We Analysis Date	t Weight	
Tech: ARM Analyst: ARM Seq Number: 3071595 Parameter Gasoline Range Hydrocarbons	Cas Number PHC610	Result 62.4	<b>RL</b> 15.0	18 14.00	% B Units mg/kg	Moisture: Basis: We Analysis Date	t Weight	1
Tech: ARM Analyst: ARM Seq Number: 3071595 Parameter Gasoline Range Hydrocarbons Diesel Range Organics	Cas Number PHC610 C10C28DRO	Result 62.4 3610	<b>RL</b> 15.0 15.0	18 14.00	% B Units mg/kg mg/kg	Moisture: Sasis: We Analysis Date 12.04.18 07.38 12.04.18 07.38	t Weight	1 1



o-Xylene

**Total Xylenes** 

Surrogate

1,4-Difluorobenzene

4-Bromofluorobenzene

**Total BTEX** 

## **Certificate of Analytical Results 607203**



1

1

1

Flag

12.06.18 03.30

12.06.18 03.30

12.06.18 03.30

**Analysis Date** 

 $12.06.18\ 03.30\\12.06.18\ 03.30$ 

mg/kg

mg/kg

mg/kg

Limits

70-130

70-130

## COG Operating LLC, Artesia, NM

Burch Keely Satellite G Battery (11-12-18)

Sample Id: <b>AH-1 0-1'</b> Lab Sample Id: 607203-001		Matrix: Date Col	Soil lected: 11.27.18 00.00	Date Received:12.03.18 11.53			
Analytical Method: BTEX by Tech: SCM Analyst: SCM Seq Number: 3071838	EPA 8021B	Date Pre	p: 12.05.18 10.30	Q	Prep Method: SW % Moisture: Basis: We	5030B t Weight	
Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Benzene	71-43-2	< 0.00200	0.00200	mg/kg	12.06.18 03.30	U	1
Toluene	108-88-3	0.00390	0.00200	mg/kg	12.06.18 03.30		1
Ethylbenzene	100-41-4	0.00362	0.00200	mg/kg	12.06.18 03.30		1
m,p-Xylenes	179601-23-1	0.00717	0.00400	mg/kg	12.06.18 03.30		1

0.00200

0.00200

0.00200

%

Recovery

107

98

Units

%

%

0.00396

0.0111

0.0187

Cas Number

540-36-3

460-00-4

95-47-6

1330-20-7

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## COG Operating LLC, Artesia, NM

Sample Id:         AH-1 1-1-5'           Lab Sample Id:         607203-002		Matrix: Date Colle	Soil cted: 11.27.	18 00.00	D	Date Received:12.0	03.18 11.5	3
Analytical Method: Chloride by EP Tech: CHE Analyst: CHE Seq Number: 3071575	A 300	Date Prep:	12.03.	18 17.00	%	rep Method: E30 6 Moisture: 8asis: Wet	00P t Weight	
Parameter	Cas Number	Result	RL		Units	Analysis Date	Flag	Dil
Chloride	16887-00-6	469	4.95		mg/kg	12.04.18 04.30		1
Analytical Method: TPH By SW80 Tech: ARM Analyst: ARM Seq Number: 3071595	15 Mod	Date Prep:	12.03.	18 14.00	%	rep Method: TX 6 Moisture: 8asis: We	1005P t Weight	
Tech: ARM Analyst: ARM	15 Mod Cas Number	Date Prep: <b>Result</b>	12.03. RL	18 14.00	%	6 Moisture:		Dil
Tech:ARMAnalyst:ARMSeq Number:3071595				18 14.00	% B	6 Moisture: Basis: We	t Weight	<b>Dil</b>
Tech:ARMAnalyst:ARMSeq Number:3071595Parameter	Cas Number	Result	RL	18 14.00	% B Units	6 Moisture: Basis: We Analysis Date	t Weight Flag	
Tech: ARM Analyst: ARM Seq Number: 3071595 Parameter Gasoline Range Hydrocarbons	Cas Number PHC610	Result <15.0	<b>RL</b> 15.0	18 14.00	% B Units mg/kg	Moisture: Basis: We Analysis Date 12.04.18 07.57	t Weight Flag	1
Tech:ARMAnalyst:ARMSeq Number:3071595ParameterGasoline Range HydrocarbonsDiesel Range Organics	Cas Number PHC610 C10C28DRO	Result <15.0 208	<b>RL</b> 15.0 15.0	18 14.00	% B Units mg/kg mg/kg	6 Moisture: Basis: West Analysis Date 12.04.18 07.57 12.04.18 07.57	t Weight Flag	1





## COG Operating LLC, Artesia, NM

Sample Id:         AH-1 1-1-5'           Lab Sample Id:         607203-002	Matrix: Date Collecte	Soil ed: 11.27.18 00.00	Date Receive	ed:12.03.18 11.53
Analytical Method: BTEX by EPA 8021B Tech: SCM			Prep Method % Moisture:	: SW5030B
Analyst:SCMSeq Number:3071838	Date Prep:	12.05.18 10.30	Basis:	Wet Weight

Parameter	Cas Number	Result	RL		Units	Analysis Date	Flag	Dil
Benzene	71-43-2	< 0.00199	0.00199		mg/kg	12.06.18 03.49	U	1
Toluene	108-88-3	< 0.00199	0.00199		mg/kg	12.06.18 03.49	U	1
Ethylbenzene	100-41-4	< 0.00199	0.00199		mg/kg	12.06.18 03.49	U	1
m,p-Xylenes	179601-23-1	< 0.00398	0.00398		mg/kg	12.06.18 03.49	U	1
o-Xylene	95-47-6	< 0.00199	0.00199		mg/kg	12.06.18 03.49	U	1
Total Xylenes	1330-20-7	< 0.00199	0.00199		mg/kg	12.06.18 03.49	U	1
Total BTEX		< 0.00199	0.00199		mg/kg	12.06.18 03.49	U	1
Surrogate		Cas Number	% Recovery	Units	Limits	Analysis Date	Flag	
4-Bromofluorobenzene		460-00-4	96	%	70-130	12.06.18 03.49		
1,4-Difluorobenzene		540-36-3	114	%	70-130	12.06.18 03.49		





## COG Operating LLC, Artesia, NM

Sample Id:         AH-1 2-2.5'           Lab Sample Id:         607203-003		Matrix: Date Colle	Soil cted: 11.27.	18 00.00	Date Received:12.03.18 11.53				
Analytical Method:Chloride by EP.Tech:CHEAnalyst:CHESeq Number:3071575	A 300	Date Prep:	12.03.	18 17.00	%	rep Method: E30 5 Moisture: asis: Wet	00P t Weight		
Parameter	Cas Number	Result	RL		Units	Analysis Date	Flag	Dil	
Chloride	16887-00-6	403	5.00		mg/kg	12.04.18 04.36		1	
Analytical Method: TPH By SW802 Tech: ARM Analyst: ARM Seq Number: 3071595	15 Mod	Date Prep:	12.03.	18 14.00	%	rep Method: TX 5 Moisture: 8asis: Wet	1005P t Weight		
Tech: ARM Analyst: ARM	15 Mod Cas Number	Date Prep: Result	12.03. <b>RL</b>	18 14.00	%	5 Moisture:		Dil	
Tech:ARMAnalyst:ARMSeq Number:3071595				18 14.00	% E	5 Moisture: Pasis: We	t Weight	<b>Dil</b>	
Tech: ARM Analyst: ARM Seq Number: 3071595 Parameter	Cas Number	Result	RL	18 14.00	% E Units	5 Moisture: asis: Wei Analysis Date	t Weight Flag		
Tech: ARM Analyst: ARM Seq Number: 3071595 Parameter Gasoline Range Hydrocarbons	Cas Number PHC610	Result <15.0	<b>RL</b> 15.0	.18 14.00	% E Units mg/kg	6 Moisture: Basis: Wet Analysis Date 12.04.18 08.16	t Weight Flag	1	
Tech: ARM Analyst: ARM Seq Number: 3071595 Parameter Gasoline Range Hydrocarbons Diesel Range Organics	Cas Number PHC610 C10C28DRO	Result <15.0 940	<b>RL</b> 15.0 15.0	18 14.00	% E Units mg/kg mg/kg	5 Moisture: 2asis: Wet Analysis Date 12.04.18 08.16 12.04.18 08.16	t Weight Flag	1	



Ethylbenzene

m,p-Xylenes

Total Xylenes

Total BTEX

Surrogate

1,4-Difluorobenzene

4-Bromofluorobenzene

o-Xylene

## **Certificate of Analytical Results 607203**



1

1

1

1

1

U

U

U

U

U

Flag

#### COG Operating LLC, Artesia, NM

Burch Keely Satellite G Battery (11-12-18)

mg/kg

mg/kg

mg/kg

mg/kg

mg/kg

Limits

70-130

70-130

12.06.18 04.08

12.06.18 04.08

12.06.18 04.08

12.06.18 04.08

12.06.18 04.08

**Analysis Date** 

12.06.18 04.08

12.06.18 04.08

Sample Id: Lab Sample Id	<b>AH-1 2-2.5'</b> l: 607203-003		Matrix: Date Coll	Soil lected: 11.27.18 00.00	Date Received:12.03.18 11.53			
Analytical Me Tech: Analyst: Seq Number:	thod: BTEX by EPA 8 SCM SCM 3071838	021B	Date Prep	p: 12.05.18 10.30	Q	Prep Method: SW % Moisture: Basis: Wet	5030B t Weight	
Parameter		Cas Number	Result	RL	Units	Analysis Date	Flag	Dil
Benzene		71-43-2	< 0.00200	0.00200	mg/kg	12.06.18 04.08	U	1
Toluene		108-88-3	< 0.00200	0.00200	mg/kg	12.06.18 04.08	U	1

< 0.00200

< 0.00400

< 0.00200

< 0.00200

< 0.00200

**Cas Number** 

540-36-3

460-00-4

0.00200

0.00400

0.00200

0.00200

0.00200

%

Recovery

106

102

Units

%

%

100-41-4

95-47-6

1330-20-7

179601-23-1

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### COG Operating LLC, Artesia, NM

Sample Id:         AH-1 3-3.5'           Lab Sample Id:         607203-004		Matrix: Date Collec	Soil cted: 11.27.18 00.00	Date Received:12.03.18 11.53				
Analytical Method: Chloride by EPA	A 300			]	Prep Method: E30	)0P		
Tech: CHE					% Moisture:			
Analyst: CHE		Date Prep:	12.03.18 17.00	]	Basis: We	t Weight		
Seq Number: 3071575								
Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil	
Chloride	16887-00-6	18.4	4.96	mg/kg	12.04.18 05.01		1	





### COG Operating LLC, Artesia, NM

Sample Id:         AH-1 4-4.5'           Lab Sample Id:         607203-005		Matrix: Date Collec	Soil cted: 11.27.18 00.00	Date Received:12.03.18 11.53				
Analytical Method: Chloride by EP.	A 300			1	Prep Method: E30	)0P		
Tech: CHE					% Moisture:			
Analyst: CHE		Date Prep:	12.03.18 17.00	i	Basis: We	t Weight		
Seq Number: 3071575								
Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil	
Chloride	16887-00-6	623	4.96	mg/kg	12.04.18 05.07		1	





### COG Operating LLC, Artesia, NM

Sample Id:         AH-1 5-5.5'           Lab Sample Id:         607203-006		Matrix: Date Collec	Soil cted: 11.27.18 00.00	Date Received:12.03.18 11.53				
Analytical Method: Chloride by EPA 3	00			I	Prep Method: E30	)0P		
Tech: CHE				ç	% Moisture:			
Analyst: CHE		Date Prep:	12.03.18 17.00	I	Basis: We	t Weight		
Seq Number: 3071575								
Parameter	Cas Number	Result	RL	Units	Analysis Date	Flag	Dil	
Chloride	16887-00-6	1260	25.0	mg/kg	12.04.18 08.29		5	



# **Flagging Criteria**



- X In our quality control review of the data a QC deficiency was observed and flagged as noted. MS/MSD recoveries were found to be outside of the laboratory control limits due to possible matrix /chemical interference, or a concentration of target analyte high enough to affect the recovery of the spike concentration. This condition could also affect the relative percent difference in the MS/MSD.
- **B** A target analyte or common laboratory contaminant was identified in the method blank. Its presence indicates possible field or laboratory contamination.
- **D** The sample(s) were diluted due to targets detected over the highest point of the calibration curve, or due to matrix interference. Dilution factors are included in the final results. The result is from a diluted sample.
- **E** The data exceeds the upper calibration limit; therefore, the concentration is reported as estimated.
- **F** RPD exceeded lab control limits.
- J The target analyte was positively identified below the quantitation limit and above the detection limit.
- U Analyte was not detected.
- L The LCS data for this analytical batch was reported below the laboratory control limits for this analyte. The department supervisor and QA Director reviewed data. The samples were either reanalyzed or flagged as estimated concentrations.
- **H** The LCS data for this analytical batch was reported above the laboratory control limits. Supporting QC Data were reviewed by the Department Supervisor and QA Director. Data were determined to be valid for reporting.
- **K** Sample analyzed outside of recommended hold time.
- **JN** A combination of the "N" and the "J" qualifier. The analysis indicates that the analyte is "tentatively identified" and the associated numerical value may not be consistent with the amount actually present in the environmental sample.
- \*\* Surrogate recovered outside laboratory control limit.
- **BRL** Below Reporting Limit.
- RL Reporting Limit
- MDL Method Detection LimitSDLSample Detection LimitLOD Limit of Detection
- PQL Practical Quantitation Limit MQL Method Quantitation Limit LOQ Limit of Quantitation
- DL Method Detection Limit
- NC Non-Calculable

SMP Clie	ent Sample	BLK	Method Blank	
BKS/LCS	S Blank Spike/Laboratory Control Sample	BKSD/LCSD	Blank Spike Duplicate/Labor	ratory Control Sample Duplicate
MD/SD	Method Duplicate/Sample Duplicate	MS	Matrix Spike	MSD: Matrix Spike Duplicate

+ NELAC certification not offered for this compound.

\* (Next to analyte name or method description) = Outside XENCO's scope of NELAC accreditation



## COG Operating LLC

Burch Keely Satellite G Battery (11-12-18)

Analytical Method:	Chloride by EPA 3	00						Pr	ep Metho	d: E30	0P	
Seq Number:	3071575			Matrix:	Solid				Date Pre	p: 12.0	3.18	
MB Sample Id:	7667269-1-BLK		LCS Sar	nple Id:	7667269-	1-BKS		LCSI	D Sample	Id: 766	7269-1-BSD	
Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limi	t Units	Analysis Date	Flag
Chloride	<5.00	250	274	110	269	108	90-110	2	20	mg/kg	12.04.18 03:03	

Analytical Method:	Chloride by EPA 3	00						Pro	ep Metho	d: E30	)P	
Seq Number:	3071575			Matrix:	Soil				Date Pre	p: 12.0	3.18	
Parent Sample Id:	606951-002		MS Sar	nple Id:	606951-00	02 S		MSE	O Sample	Id: 6069	951-002 SD	
Parameter	Parent	Spike	MS	MS	MSD	MSD	Limits	%RPD I	RPD Limi	t Units	Analysis	Flag
	Result	Amount	Result	%Rec	Result	%Rec					Date	

Analytical Method:	Chloride by EPA 3	00						Prep Metho	d: E30	)P	
Seq Number:	3071575			Matrix:	Soil			Date Pre	p: 12.0	3.18	
Parent Sample Id:	607264-007		MS San	nple Id:	607264-00	07 S		MSD Sample	Id: 6072	264-007 SD	
<b>D</b> (	Parent	<b>G</b> . <b>1</b>	MG	MC			<b>.</b>				
Parameter	Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD RPD Limi	t Units	Analysis Date	Flag

Analytical Method: Seq Number: MB Sample Id:	<b>TPH By S</b> 3071595 7667325-1		od		Matrix: nple Id:	Solid 7667325-	1-BKS			Prep Method Date Prep SD Sample I	o: 12.0	.005P 3.18 7325-1-BSD	
Parameter		MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPI	) RPD Limit	Units	Analysis Date	Flag
Gasoline Range Hydroc	arbons	<8.00	1000	853	85	879	88	70-135	3	20	mg/kg	12.03.18 15:39	
Diesel Range Organics		<8.13	1000	842	84	856	86	70-135	2	20	mg/kg	12.03.18 15:39	
Surrogate		MB %Rec	MB Flag		CS Rec	LCS Flag	LCSI %Re	-		Limits	Units	Analysis Date	
1-Chlorooctane		98		1	14		116		,	70-135	%	12.03.18 15:39	
o-Terphenyl		105		9	93		95			70-135	%	12.03.18 15:39	

[D] = 100\*(C-A) / B RPD = 200\* | (C-E) / (C+E) | [D] = 100 \* (C) / [B] Log Diff. = Log(Sample Duplicate) - Log(Original Sample)

LCS = Laboratory Control Sample A = Parent Result C = MS/LCS Result E = MSD/LCSD Result MS = Matrix Spike B = Spike Added D = MSD/LCSD % Rec



### **COG Operating LLC**

Burch Keely Satellite G Battery (11-12-18)

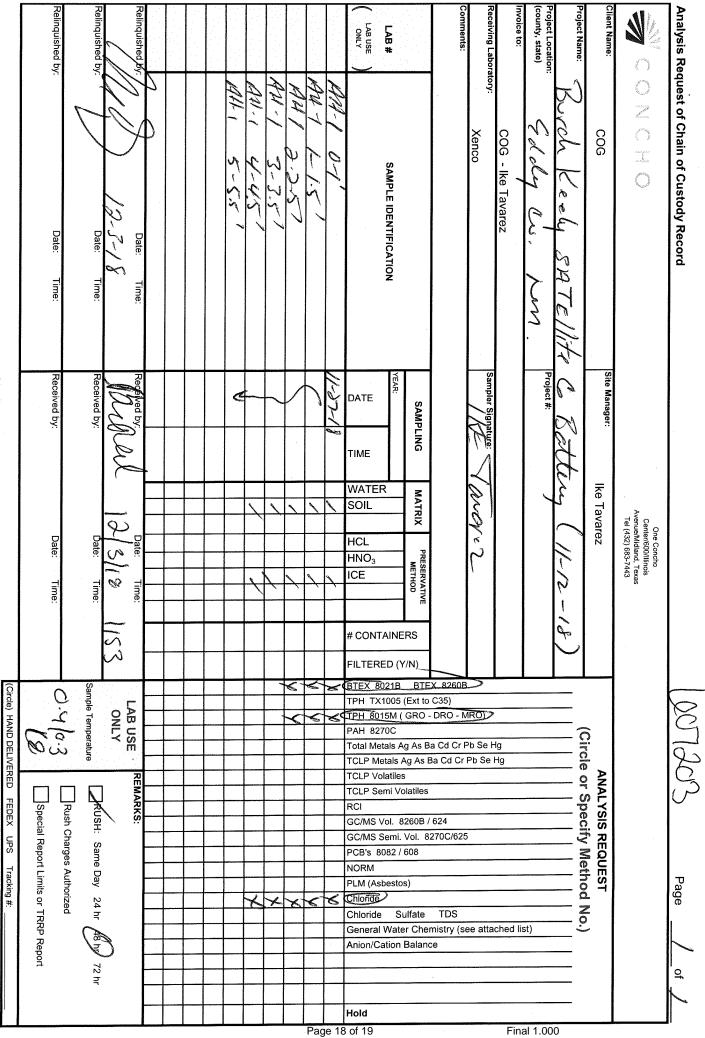
Analytical Method: TPH By SW8015 Mod									Prep Method: TX1005P					
Seq Number: 3071595			Matrix: Soil				Date Prep: 12.03.18							
Parent Sample Id: 607275-001			MS Sar	nple Id:	607275-00	01 S		MS	MSD Sample Id: 607275-001 SD					
Parameter		Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag	
Gasoline Range Hydroc	arbons	8.03	999	849	84	850	84	70-135	0	20	mg/kg	12.03.18 16:38		
Diesel Range Organics		14.3	999	856	84	858	85	70-135	0	20	mg/kg	12.03.18 16:38		
Surrogate					AS Rec	MS Flag	MSD %Ree			mits	Units	Analysis Date		
1-Chlorooctane		97			101		70-135		%	12.03.18 16:38				
o-Terphenyl			9		89			-135	%	12.03.18 16:38				

<b>Analytical Method:</b> Seq Number: MB Sample Id:	<b>BTEX by EPA 802</b> 3071838 7667476-1-BLK	lB	LCS San	Matrix: nple Id:	Solid 7667476-	1-BKS			Prep Metho Date Pre SD Sample	p: 12.0	5030B 5.18 7476-1-BSD	
Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPI	) RPD Limi	t Units	Analysis Date	Flag
Benzene	< 0.000385	0.100	0.0904	90	0.102	101	70-130	12	35	mg/kg	12.06.18 00:22	
Toluene	< 0.000456	0.100	0.0957	96	0.109	108	70-130	13	35	mg/kg	12.06.18 00:22	
Ethylbenzene	< 0.000565	0.100	0.105	105	0.120	119	70-130	13	35	mg/kg	12.06.18 00:22	
m,p-Xylenes	< 0.00101	0.200	0.198	99	0.224	111	70-130	12	35	mg/kg	12.06.18 00:22	
o-Xylene	< 0.000344	0.100	0.0966	97	0.108	107	70-130	11	35	mg/kg	12.06.18 00:22	
Surrogate	MB %Rec	MB Flag			LCS Flag	LCSE %Rec			Limits	Units	Analysis Date	
1,4-Difluorobenzene	111		ç	95		94		-	70-130	%	12.06.18 00:22	
4-Bromofluorobenzene	82		1	00		102		Ĩ	70-130	%	12.06.18 00:22	

<b>Analytical Method:</b> Seq Number: Parent Sample Id:	<b>BTEX by EPA 802</b> 3071838 606767-001	1B		Matrix: nple Id:		01 S			Prep Metho Date Pre SD Sample	p: 12.0	5030B 5.18 767-001 SD	
Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPI	) RPD Limit	Units	Analysis Date	Flag
Benzene	< 0.000383	0.0994	0.0644	65	0.0679	68	70-130	5	35	mg/kg	12.06.18 01:00	Х
Toluene	< 0.000453	0.0994	0.0690	69	0.0737	74	70-130	7	35	mg/kg	12.06.18 01:00	Х
Ethylbenzene	< 0.000561	0.0994	0.0706	71	0.0761	76	70-130	7	35	mg/kg	12.06.18 01:00	
m,p-Xylenes	0.00111	0.199	0.133	66	0.144	71	70-130	8	35	mg/kg	12.06.18 01:00	Х
o-Xylene	0.000360	0.0994	0.0636	64	0.0696	69	70-130	9	35	mg/kg	12.06.18 01:00	Х
Surrogate				1S Rec	MS Flag	MSD %Re		-	Limits	Units	Analysis Date	
1,4-Difluorobenzene			ç	98		96			70-130	%	12.06.18 01:00	
4-Bromofluorobenzene			1	05		105		,	70-130	%	12.06.18 01:00	

MS/MSD Percent Recovery Relative Percent Difference LCS/LCSD Recovery Log Difference [D] = 100\*(C-A) / B RPD = 200\* | (C-E) / (C+E) | [D] = 100 \* (C) / [B] Log Diff. = Log(Sample Duplicate) - Log(Original Sample)

LCS = Laboratory Control Sample A = Parent Result C = MS/LCS Result E = MSD/LCSD Result MS = Matrix Spike B = Spike Added D = MSD/LCSD % Rec



ORIGINAL COPY



# **XENCO Laboratories**



Prelogin/Nonconformance Report- Sample Log-In

Client: COG Operating LLC	Acceptable Temperature Range: 0 - 6 degC						
Date/ Time Received: 12/03/2018 11:53:00 AM	Air and Metal samples Acceptable Range: Ambient						
Work Order #: 607203	Temperature Measuring device used : R8						
Sample Rece	ipt Checklist Comments						
#1 *Temperature of cooler(s)?	.3						
#2 *Shipping container in good condition?	Yes						
#3 *Samples received on ice?	Yes						
#4 *Custody Seals intact on shipping container/ cooler?	N/A						
#5 Custody Seals intact on sample bottles?	N/A						
#6*Custody Seals Signed and dated?	N/A						
#7 *Chain of Custody present?	Yes						
#8 Any missing/extra samples?	Νο						
#9 Chain of Custody signed when relinquished/ received?	Yes						
#10 Chain of Custody agrees with sample labels/matrix?	Yes						
#11 Container label(s) legible and intact?	Yes						
#12 Samples in proper container/ bottle?	Yes						
#13 Samples properly preserved?	Yes						
#14 Sample container(s) intact?	Yes						
#15 Sufficient sample amount for indicated test(s)?	Yes						
#16 All samples received within hold time?	Yes						
#17 Subcontract of sample(s)?	N/A						
#18 Water VOC samples have zero headspace?	Ν/Α						

#### \* Must be completed for after-hours delivery of samples prior to placing in the refrigerator

Analyst:

PH Device/Lot#:

Checklist completed by:

Date: 12/03/2018

Checklist reviewed by: Jession Vermer

Jessica Kramer

Date: 12/03/2018