# R. T. HICKS CONSULTANTS, LTD.

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuguergue, NM 87104 ▲ 505.266.5004 ▲ Fax: 505.266-0745

May 31, 2016

Mr. Jamie Keyes NMOCD District 1 1625 French Drive Hobbs, NM 88240

Via e-mail: jamie.keyes@state.nm.us

RE: Final C-141, Murchison - Bettis 20 State Com #2H release

API #30-025-41436, Pit Permit #P1-06545

Dear Mr. Keyes:

On behalf of Murchison Oil and Gas, R.T. Hicks Consultants submits this final C-141/closure report for the release that occurred at the above-referenced temporary pit. The release occurred on April 7, 2014 as a result of a breach of the liner during drilling due to the discharge pipe positioned too high on the side of the pit wall. The liner was immediately repaired upon discovery, as described in the initial C-141 form submitted to NMOCD the same day.

In accordance with the approved closure plan submitted with the C-144 temporary pit application, soils immediately beneath the liner were mixed with drilling solids (no more than 3:1 ratio) during the stabilization process. At the site of the release, the discharge slope was excavated until dry material was encountered at 5 feet below surface. A composite sample was collected from the 4 x 6 x 5-ft sample trench on February 9, 2015 for laboratory analysis of Pit Rule parameters. All concentrations were less than the Table I (19.15.17.13 NMAC) targets and on-site closure proceeded per the approved plan and approved closure variance. The pit closure was completed on March 11, 2016 and a final C-144 closure report was submitted to NMOCD on May 17, 2016.



Excavation at outer discharge slope 2/9/2015

The surface will be monitored and R.T. Hicks Consultants will notify NMOCD and provide photo-documentation when re-vegetation obligations described in the Pit Rule are met. We respectfully request closure for this release.

Sincerely,

R.T. Hicks Consultants

Knistin Pope

Kristin Pope Project Geologist

Enclosures: Final C-141 form, lab report

Copy: Murchison Oil and Gas, NM State Land Office

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

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Form C-141

Revised August 8, 2011

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

## **Release Notification and Corrective Action**

						<b>OPERA</b>	ΓOR		☐ Initial Report ☐ Final Repo				
Name of Co	mpany		Murchi	son Oil & Gas, I	nc.	Contact Greg I							
Address		Dallas Parkwa		100, Plano, TX 750		Telephone No. (575) 628-393							
Facility Nar	ne		Betti	s 20 State Com #	2H	Facility Typ	ed, on-site burial)						
Surface Ow	ner	State of N	lew Mexi	ico Mineral Ov	vner			API No.	o. 30-025-41436				
				LOCA	ΓΙΟΙ	N OF REI	LEASE						
Unit Letter	Section	Township	Range	Feet from the	North/	South Line	Feet from the	East/Wes	st Line	County			
P	20	24S	33E	200	1	South	940	Eas	East Lea				
	L	atitude	32° 1	1' 47.195" N		<b>Longitude</b> 103° 35'19.732" W							
NATURE OF RELEASE													
Type of Rele				Drilling	Volume of				ecovered	unknown			
Source of Re	lease	Disc	harge fron	n drilling rig into tl	he pit	4/7/2014	Iour of Occurrence			Hour of Disc 12:00 pm	covery		
Discharge from drilling rig into the pit 4/7/2014 4/7/2014 12:00 pm  Was Immediate Notice Given?  Yes No Not Required Voicemail to Geoffrey Leking													
By Whom?				Kristin		Date and H	lour				4/8/2014 8:43 am		
Was a Water	course Reac	hed?	Yes 🏻			If YES, Vo	lume Impacting the	he Waterco	ourse.				
IC - W-4	Т	L D											
If a Watercou	irse was im	pacted, Descri	be Fully.										
n/a													
Describe Cau	se of Proble	em and Reme	dial Action	n Taken.*									
Drilling discharge pipe was discharging drilling fluid too high on side of pit wall. Impact from the fluid eroded substrate and caused a breach in the pit liner. Upon discovery, vacuum trucks removed fluid under the liner and lowered fluid level in the pit to allow repair of liner. Liner was patched and discharge pipe was extended.													
Describe Are	Describe Area Affected and Cleanup Action Taken.*												
During the pit closure process, shallow soils immediately beneath the liner were excavated and mixed with drilling solids for stabilization (not greater than 3:1 mixture). On 2/9/2015, the slope of the discharge wall was excavated until dry material was encountered at 5 ft BGS. A 5-point composite sample was collected from the 4 x 6 x 5 ft sample trench for lab analysis. All contaminant concentrations from the sample are less than those listed in Table I of 19.15.17.13 NMAC. In-place closure of the pit continued in accordance with the approved plan submitted with the C-144 application and the approved closure variance. A final C-144/closure report was submitted to NMOCD for the temporary pit on 5/17/2016 (Pit Permit #P1-06545).													
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD 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 NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD 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.													
	4	$\wedge$					OIL CONS	SERVA'	TION	DIVISIO	<u>N</u>		
Signature:	12	1 12					г	* 1* :					
Printed Name	<del>)</del> :	12.00		Greg Boa	ins	Approved by	Environmental Sp	becialist:					
Title:			Prod	uction Superintend	ent .	Approval Date: Expiration				Date:			
E-mail Addre	ess:			gboans@jdmii.co	om	Conditions of	Approval:		Attached				
Date: 5/31/2	016	Pho	ne:	(575) 628-39	932						_		



Hall Environmental Analysis Laboratory 4901 Hawkins NE Albuquerque, NM 87109 TEL: 505-345-3975 FAX: 505-345-4107 Website: www.hallenvironmental.com

February 20, 2015

Kristin Pope

R.T. Hicks Consultants, LTD 901 Rio Grande Blvd. NW Suite F-142

Albuquerque, NM 87104 TEL: (575) 302-6755 FAX (505) 266-0745

RE: Bettis #2H Release OrderNo.: 1502613

### Dear Kristin Pope:

Hall Environmental Analysis Laboratory received 1 sample(s) on 2/13/2015 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to <a href="www.hallenvironmental.com">www.hallenvironmental.com</a> or the state specific web sites. In order to properly interpret your results it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

Andy Freeman

Laboratory Manager

andel

4901 Hawkins NE

Albuquerque, NM 87109

# **Analytical Report**

### Lab Order **1502613**

Hall Environmental Analysis Laboratory, Inc.

Date Reported: 2/20/2015

CLIENT: R.T. Hicks Consultants, LTD Client Sample ID: 5-pt Comp @ 5'

 Project:
 Bettis #2H Release
 Collection Date: 2/9/2015 1:40:00 PM

 Lab ID:
 1502613-001
 Matrix: SOIL
 Received Date: 2/13/2015 9:00:00 AM

Analyses	Result	RL Qu	al Units	DF Date Analyzed Batch
EPA METHOD 8015D: DIESEL RANG	E ORGANICS			Analyst: <b>JME</b>
Diesel Range Organics (DRO)	ND	12	mg/Kg	1 2/17/2015 7:24:03 PM 17747
Motor Oil Range Organics (MRO)	ND	59	mg/Kg	1 2/17/2015 7:24:03 PM 17747
Surr: DNOP	88.7	63.5-128	%REC	1 2/17/2015 7:24:03 PM 17747
EPA METHOD 8015D: GASOLINE RA	ANGE			Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0	mg/Kg	1 2/17/2015 12:38:02 PM 17762
Surr: BFB	89.2	80-120	%REC	1 2/17/2015 12:38:02 PM 17762
EPA METHOD 8021B: VOLATILES				Analyst: NSB
Benzene	ND	0.050	mg/Kg	1 2/17/2015 12:38:02 PM 17762
Toluene	ND	0.050	mg/Kg	1 2/17/2015 12:38:02 PM 17762
Ethylbenzene	ND	0.050	mg/Kg	1 2/17/2015 12:38:02 PM 17762
Xylenes, Total	ND	0.10	mg/Kg	1 2/17/2015 12:38:02 PM 17762
Surr: 4-Bromofluorobenzene	96.6	80-120	%REC	1 2/17/2015 12:38:02 PM 17762
EPA METHOD 300.0: ANIONS				Analyst: <b>LGT</b>
Chloride	3600	750	mg/Kg	500 2/18/2015 6:50:04 PM 17780

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

### Qualifiers:

- Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit

Page 1 of 5

- P Sample pH Not In Range
- RL Reporting Detection Limit

# Hall Environmental Analysis Laboratory, Inc.

WO#: **1502613** 

20-Feb-15

Client: R.T. Hicks Consultants, LTD

**Project:** Bettis #2H Release

Sample ID MB-17780 SampType: MBLK TestCode: EPA Method 300.0: Anions

Client ID: **PBS** Batch ID: **17780** RunNo: **24367** 

Prep Date: 2/17/2015 Analysis Date: 2/17/2015 SeqNo: 718067 Units: mg/Kg

Analyte Result PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD RPDLimit Qual

Chloride ND 1.5

Sample ID LCS-17780 SampType: LCS TestCode: EPA Method 300.0: Anions

Client ID: LCSS Batch ID: 17780 RunNo: 24367

Prep Date: 2/17/2015 Analysis Date: 2/17/2015 SeqNo: 718068 Units: mg/Kg

Analyte Result PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD RPDLimit Qual

Chloride 14 1.5 15.00 0 93.0 90 110

### Qualifiers:

- \* Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH Not In Range
- RL Reporting Detection Limit

Page 2 of 5

# Hall Environmental Analysis Laboratory, Inc.

WO#: **1502613** 

20-Feb-15

Client: R.T. Hicks Consultants, LTD

**Project:** Bettis #2H Release

Sample ID MB-17747 SampType: MBLK TestCode: EPA Method 8015D: Diesel Range Organics Client ID: PBS Batch ID: 17747 RunNo: 24338 Analysis Date: 2/17/2015 Prep Date: 2/13/2015 SeqNo: 717363 Units: mg/Kg Analyte **PQL** SPK value SPK Ref Val %REC LowLimit HighLimit %RPD **RPDLimit** Qual Diesel Range Organics (DRO) ND 10 Motor Oil Range Organics (MRO) ND 50 Surr: DNOP 10.00 127 63.5 13 128

Sample ID LCS-17747 SampType: LCS TestCode: EPA Method 8015D: Diesel Range Organics Client ID: LCSS Batch ID: 17747 RunNo: 24338 Analysis Date: 2/17/2015 Prep Date: 2/13/2015 SeqNo: 717371 Units: mg/Kg Analyte SPK value SPK Ref Val %REC LowLimit HighLimit %RPD **RPDLimit** Qual Diesel Range Organics (DRO) 10 0 129 67.8 64 50.00 130 Surr: DNOP 6.2 5.000 125 63.5 128

#### Qualifiers:

- \* Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH Not In Range
- RL Reporting Detection Limit

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# Hall Environmental Analysis Laboratory, Inc.

WO#: **1502613** 

20-Feb-15

Client: R.T. Hicks Consultants, LTD

**Project:** Bettis #2H Release

Sample ID MB-17762 SampType: MBLK TestCode: EPA Method 8015D: Gasoline Range

Client ID: PBS Batch ID: 17762 RunNo: 24348

Prep Date: 2/16/2015 Analysis Date: 2/17/2015 SeqNo: 717850 Units: mg/Kg

Analyte Result PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD RPDLimit Qual

Gasoline Range Organics (GRO) ND 5.0

Surr: BFB 910 1000 90.7 80 120

Sample ID LCS-17762 SampType: LCS TestCode: EPA Method 8015D: Gasoline Range

Client ID: LCSS Batch ID: 17762 RunNo: 24348

Prep Date: 2/16/2015 Analysis Date: 2/17/2015 SeqNo: 717851 Units: mg/Kg

Analyte Result PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD RPDLimit Qual

 Gasoline Range Organics (GRO)
 25
 5.0
 25.00
 0
 101
 64
 130

 Surr: BFB
 970
 1000
 96.5
 80
 120

Sample ID LCSD-17762 SampType: LCSD TestCode: EPA Method 8015D: Gasoline Range

Client ID: LCSS02 Batch ID: 17762 RunNo: 24348

Prep Date: 2/16/2015 Analysis Date: 2/17/2015 SeqNo: 717852 Units: %REC

Analyte Result PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD RPDLimit Qual

Surr: BFB 970 0

#### Qualifiers:

- \* Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH Not In Range
- RL Reporting Detection Limit

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# Hall Environmental Analysis Laboratory, Inc.

WO#: **1502613** 

20-Feb-15

Client: R.T. Hicks Consultants, LTD

**Project:** Bettis #2H Release

Sample ID MB-17762 SampType: MBLK TestCode: EPA Method 8021B: Volatiles Client ID: **PBS** Batch ID: 17762 RunNo: 24348 Prep Date: 2/16/2015 Analysis Date: 2/17/2015 SeqNo: 717868 Units: mg/Kg Analyte **PQL** SPK value SPK Ref Val %REC LowLimit HighLimit %RPD **RPDLimit** Qual ND 0.050 Benzene ND 0.050 Toluene 0.050 Ethylbenzene ND Xylenes, Total ND 0.10 Surr: 4-Bromofluorobenzene 0.99 1.000 99.0 80 120

Sample ID LCS-17762 SampType: LCS TestCode: EPA Method 8021B: Volatiles Client ID: LCSS Batch ID: 17762 RunNo: 24348 Prep Date: Analysis Date: 2/17/2015 SeqNo: 717869 2/16/2015 Units: mg/Kg Analyte **PQL** SPK value SPK Ref Val %REC LowLimit HighLimit %RPD **RPDLimit** Qual 1.1 0.050 1.000 0 108 80 120 Benzene Toluene 1.0 0.050 1.000 0 104 80 120 Ethylbenzene 0.050 1.000 0 105 80 120 1.0 103 Xylenes, Total 3.1 0.10 3.000 0 80 120 104 Surr: 4-Bromofluorobenzene 1.0 1.000 80 120

Sample ID LCSD-17762	SampT	ype: <b>LC</b>	SD	TestCode: EPA Method 8021B: Volatiles									
Client ID: LCSS02	Batch	n ID: <b>17</b> 7	762	R	RunNo: 2								
Prep Date: 2/16/2015	Analysis D	oate: <b>2/</b>	17/2015	S	SeqNo: 7	17870	Units: mg/Kg						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual			
Benzene	1.1	0.050	1.000	0	108	80	120	0.228	20				
Toluene	1.1	0.050	1.000	0	108	80	120	3.04	20				
Ethylbenzene	1.1	0.050	1.000	0	107	80	120	1.50	20				
Xylenes, Total	3.1	0.10	3.000	0	104	80	120	1.61	20				
Surr: 4-Bromofluorobenzene	1.1		1.000		105	80	120	0					

#### Qualifiers:

\* Value exceeds Maximum Contaminant Level.

E Value above quantitation range

J Analyte detected below quantitation limits

O RSD is greater than RSDlimit

R RPD outside accepted recovery limits

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ND Not Detected at the Reporting Limit

P Sample pH Not In Range

RL Reporting Detection Limit

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Hall Environmental Analysis Laboraiory 4901 Hawkins NE Albuquerque, NM 87105

TEL: 505-345-3975 FAX: 505-345-4107 Website: www.hallenvironmental.com

# Sample Log-In Check List

RoptNo: 1 Work Order Number: 1502613 Client Name: RT HICKS Received by/date: Ashley Gallegos 2/13/2015 9:00:00 AM Logged By: 2/13/2015 9:32:39 AM Completed By: Ashley Gallegos Reviewed By: Chain of Custody No 🗌 Not Present V Yes 1. Custody seals intact on sample bottles? No \_ Not Present Yes 🗸 2. Is Chain of Custody complete? 3. How was the sample delivered? Courier Log In NA 🗌 Yes V 4. Was an attempt made to cool the samples? NA Were all samples received at a temperature of >0° C to 6.0°C No \_ No 🗌 Yes V Sample(s) in proper container(s)? 7. Sufficient sample volume for indicated test(s)? 8. Are samples (except VOA and ONG) properly preserved? No V NA 9. Was preservative added to bottles? Yes No VOA Vials V No \_ Yes 10. VOA vials have zero headspace? No V Yes 11. Were any sample containers received broken? # of preserved bottles checked No 🗌 for pH: Yes 12. Does paperwork match bottle labels? (<2 or >12 unless noted) (Note discrepancies on chain of custody) Adjusted? No 13. Are matrices correctly identified on Chain of Custody? No 🗌 Yes 14 Is it clear what analyses were requested? Checked by: Yes 🗸 No \_ 15. Were all holding times able to be met? (If no, notify customer for authorization.) Special Handling (if applicable) No. NA V Yes 16. Was client notified of all discrepancies with this order? Date Person Notified: Via: Phone Fax In Person eMail By Whom: Regarding: Client Instructions: 17. Additional remarks: 18. Cooler Information Cooler No Temp °C Condition Seal Intact Seal No Seal Date Signed By Yes 2.4 Good

HALL ENVIRONMENTAL	ANALYSIS LABORATORY	.com	NM 87109	15-4107	est	79	1550	d <u>j</u> !	<i>' 5</i> (	0V) 8028 me8) 0728 mm g 00)	*					Date Time Remarks:    2   13   15 0900 Email to Kristin @ rthicksconsult.com, R @ "
FNVIR	YSIS LA	www.hallenvironmental.com	- Albuquerque, NM 87109	Fax 505-345-4107	Analysis Request	( <sup>†</sup> OS	PO4,	ON'E	etals OLC Sebio	RCRA 8 Me Aniona (F	×					& cthic
HAII	ANAL	www.ha	4901 Hawkins NE -	Tel. 505-345-3975				(1.81 (1.40	p po	TPH (Methorite) (Methorite) (Methorite) (Methorite) (Methorite) (83)		7				to Kristin
		1	4901	Tel. 6	12	ouly)	(Gas	H4T +	38.	TM + X3T8 TM + X3T8 B&108 H9T,	× +					Remarks:
Turn-Around Time:	Standard   Rush	rioject name.	Bottis + 3H release			Project Manager:	Kristin Pool	Sampler: Kristin Popul	Temperature: 2,4	Container Preservative HEAL No. Type and # 1502013	100 001 5001					Received by: Received by
Chain-of-Custody Record	Client R.T. Hicks Consultants		Mailing Address:	Albuquerous, NM	2	ax#: Racthic	QA/QC Package:  Standard  □ Level 4 (Full Validation)	Accreditation	ype)	Date Time Matrix Sample Request ID	19/15 1340 Soil 5-nt nome @5"					Date: Time: Relinquished by:  Author Ape Date: Time: Relinquished by: