

P.O. Box 1708 • Artesia, NM 88211 www.hrlcomp.com

June 4, 2020

Mr. Tom Bynum
Devon Energy
6488 Seven Rivers Highway
Artesia, New Mexico 88211
Email: tom.bynum@dvn.com

Subject: Site Characterization and Closure Report

Cotton Draw Unit 172H (May 2016)

2RP-3683

Eddy County, New Mexico

Dear Mr. Bynum:

HRL Compliance Solutions, Inc. (HRL) is pleased to submit this site characterization and closure report for the May 6, 2016 release at the Cotton Draw Unit 172H (Site). The release was at latitude 32.151932353 and longitude -103.726815365 in Eddy County, New Mexico (Figure 1) (Attachment A, Photographs).

Site Background

On May 6, 2016, a release of 20 barrels (bbls) of produced water was observed at the Site. The release was due to equipment failure when a gasket blew out on the main water line between the valve and the pipe. The valves on each side of the line were immediately shut so the line could be bypassed and stop the flow of water. The produced water was released in the right-of-way, in a 75-foot square area south of the well pad. None of the produced water was recovered.

Because the volume released was between five bbls and 25 bbls; this is considered a minor release according to the New Mexico Oil Conservation Division (NMOCD). On May 9, 2016, Devon reported the release to the NMOCD on a Release Notification and Corrective Action Form (Form C-141) (Attachment B). The release was assigned Remediation Permit (RP) number 2RP-3683.

Scope of Work

Devon has requested HRL to provide the following deliverables:

- Research the information as specified in the Site Characterization on the New Mexico Oil and Conservation Division (NMOCD) Form C-141
- Prepare a map with sample points labeled
- Prepare a table summarizing the results obtained during the site characterization activities
- Prepare a site characterization report including a remediation plan per NMOCD closure requirements and related cost estimates

INNOVATIVE SOLUTIONS DELIVERED



New Mexico Administrative Code (NMAC) Site Characterization Criteria

Title 19, Chapter 15, Part 29, Section 11 of the New Mexico Administrative Code (NMAC) provides requirements for release characterization once the free liquids and recoverable materials have been removed from the Site.

Depth to Groundwater

Depth to groundwater at the release was estimated by evaluating data from the New Mexico Office of the State Engineer (NMOSE) and the United States Geological Survey (USGS) (Figure 2). The nearest groundwater well was approximately 1 mile from the Site; the depth to water in this well was 390 feet below ground surface (bgs).

Wellhead Protection Area

There are no sources of water, including springs, wells, or other sources of fresh water, within one-half mile of the release (Figure 2).

Distance to Nearest Significant Watercourse

A significant watercourse is defined as "...a watercourse with a defined bed and bank either named or identified by a dashed blue line on a USGS 7.5-minute quadrangle map or the next lower order tributary with a defined bed and bank" (19.15.17.7 NMAC) (Figure 2). There are no significant watercourses within one-half mile of the lateral extents of the release.

Additional Site Characterization Criteria

The following is additional information related to characterization of the Site.

Site Characterization	Response/Discussion
What is the shallowest depth to groundwater beneath the area affected by the release?	Greater than 100 feet
Did the release impact groundwater or surface water?	No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or other significant watercourse?	No
Are the lateral extents of the release within 200 feet of a lakebed, sinkhole, or playa lake?	No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital institution, or church?	No
Are the lateral extents of the release within 500 feet of a spring or private, domestic fresh water well used by less than five households for domestic or stock watering purposes?	No

Cotton Draw Unit 172H (May 2016) June 4, 2020



Site Characterization	Response/Discussion
Are the lateral extents of the release within 1,000 feet of any fresh water well or spring?	No
Are the lateral extents of the release within any incorporated municipal boundaries?	No
Are the lateral extents of the release within a defined municipal fresh water well field?	No
Are the lateral extents of the release within 300 feet of a wetland?	No
Are the lateral extents of the release overlying a subsurface mine?	No
Are the lateral extents of the release overlying an unstable area such as karst geology?	The Site is in an area of low potential for karst topography
Are the lateral extents of the release within the 100-year floodplain?	No
Did the release impact areas not on an exploration, development, production, or storage site?	No

Site Delineation

Prior to initiating field activities, HRL submitted a mechanical excavation permit to Devon Energy and had subsurface utilities located at the Site. On March 8, 2020, HRL mobilized to the Site to evaluate the release. Soil samples were collected from nine locations (SP1 through SP9). The soil samples were collected from ground surface. To collect information for the vertical extent of the release, additional samples were collected from SP1 at two-inches below ground surface (bgs), SP3 at four inches bgs, SP5 at two inches bgs, SP5 at five inches bgs, SP7 at five inches bgs, SP9 at five inches, eight inches, and nine inches bgs. Samples were analyzed in the field (field screening) by one or more of the following methods:

- Chloride was approximated using an electrical conductivity (EC) meter in accordance with methods recommended by the U.S. Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS)
- Non-specific volatile organic compounds (VOCs) were measured using a photoionization detector (PID) with a 10.6 electron-volt (eV) lamp
- Total petroleum hydrocarbons (TPH) was measured using a PetroFlag® field test kit in accordance with U.S. Environmental Protection Agency (EPA) Method 9074

Field screening results indicated that electrical conductivity values ranged from 19 microsiemens per centimeter (µs/cm) to 3,100 µs/cm and PID values ranged from 3.2 parts per million (ppm) to 98.9 ppm.

Based on the field screening results, HRL mobilized to the Site on April 3, 2020 to collect soil samples for laboratory analysis. Six soil samples (SP9A, SP9B, SP10, SP11, SP12, SP13) were immediately placed on ice and kept under strict chain of custody protocol prior to submission to Hall Environmental Analysis Laboratory of Albuquerque, New Mexico for analysis of:



- Chloride by United States Environmental Protection Agency (US EPA) Method 300.0
- Benzene, toluene, ethyl benzene, and total xylenes (BTEX) by US EPA Method 8021B
- Total petroleum hydrocarbons (TPH) gasoline range organics (GRO), diesel range organics (DRO), and oil range organics (ORO) by US EPA Method 8015M

Closure Criteria

Based on the NMAC Site Characterization Criteria, HRL has applied the following NMOCD Closure Criteria to the release:

Depth to Groundwater	Parameter	Closure Criteria in milligrams per kilogram (mg/kg)
	Chloride	20,000 mg/kg or natural background, whichever is greater
Greater than 100 feet below	Total Petroleum Hydrocarbons (TPH) [Gasoline Range Organics (GRO) + Diesel Range Organics (DRO) + Oil Range Organics (ORO)]	2,500 mg/kg
ground surface	Gasoline Range Organics (GRO) + Diesel Range Organics (DRO)	1,000 mg/kg
	Benzene	10 mg/kg
	Benzene, Toluene, Ethylbenzene, and Total Xylenes (BTEX)	50 mg/kg

Remediation and Reclamation

A scaled diagram depicting the area of investigation and nearby significant features, such as roads, site infrastructure, location of borings, sample points, monitoring wells (if present) and subsurface features (if data was available) has been prepared (Figure 3). HRL utilized a Trimble GeoXT global positioning system (GPS) unit to collect latitude and longitude data for the sample locations.

Chloride, benzene, toluene, ethylbenzene, total xylenes (BTEX), gasoline range organics (GRO), diesel range organics (DRO), and oil range organics (ORO) were not detected in the soil samples (Attachment B). Based on evaluation of the laboratory results of the soil samples, remediation of the impacted soil is not necessary.

Conclusions and Recommendations

Results of soil samples were below the applicable closure criteria specified in 19.15.29.12 NMAC. Therefore, additional remedial action is not necessary; HRL recommends closure of this release.

Cotton Draw Unit 172H (May 2016) June 4, 2020



Scope and Limitations

The scope of HRL's services consists of performing site characterization and preparation of this site characterization report and closure request. All work has been performed in accordance with generally accepted professional environmental consulting practices for oil and gas releases in the Permian Basin.

We appreciate the opportunity to work with Devon on this project. If you have any questions or concerns, please do not hesitate to contact me at (970) 243-3271 or via email at jlinn@hrlcomp.com.

Sincerely,

HRL Compliance Solutions, Inc.

Julie Linn, PG, RG **Project Manager**

Figures:

Figure 1: Site Location

Figure 2: Depth to Groundwater

Figure 3: Sample Location and Results

Tables:

Table 1: Analytical Laboratory Results

Attachments:

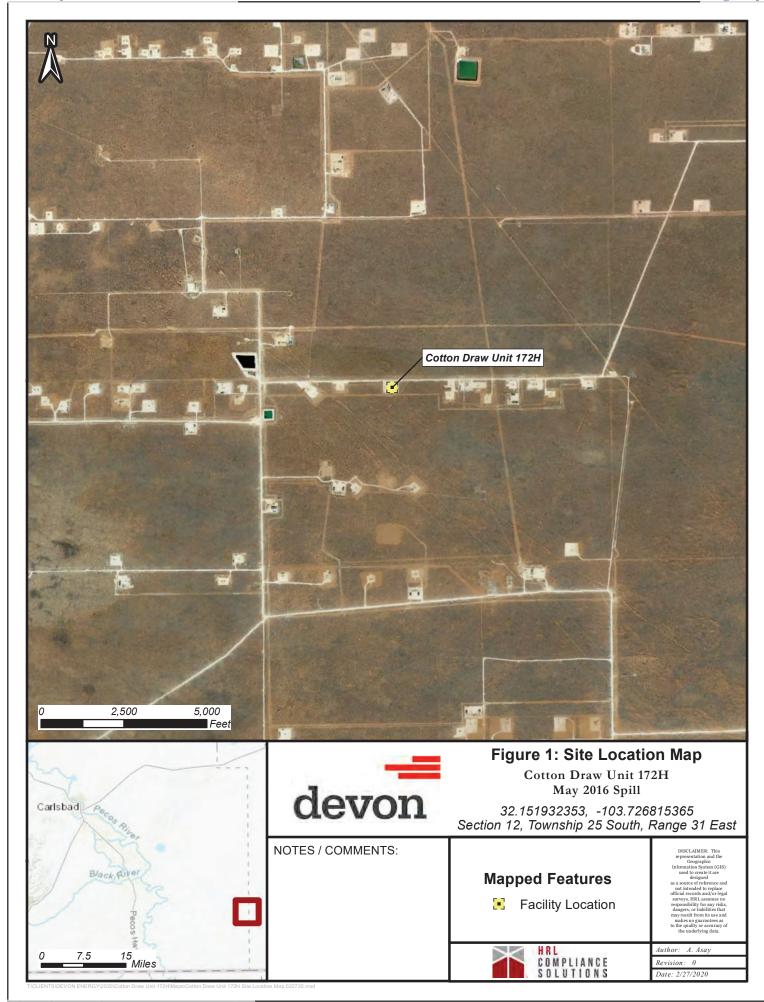
Attachment A: Photographs

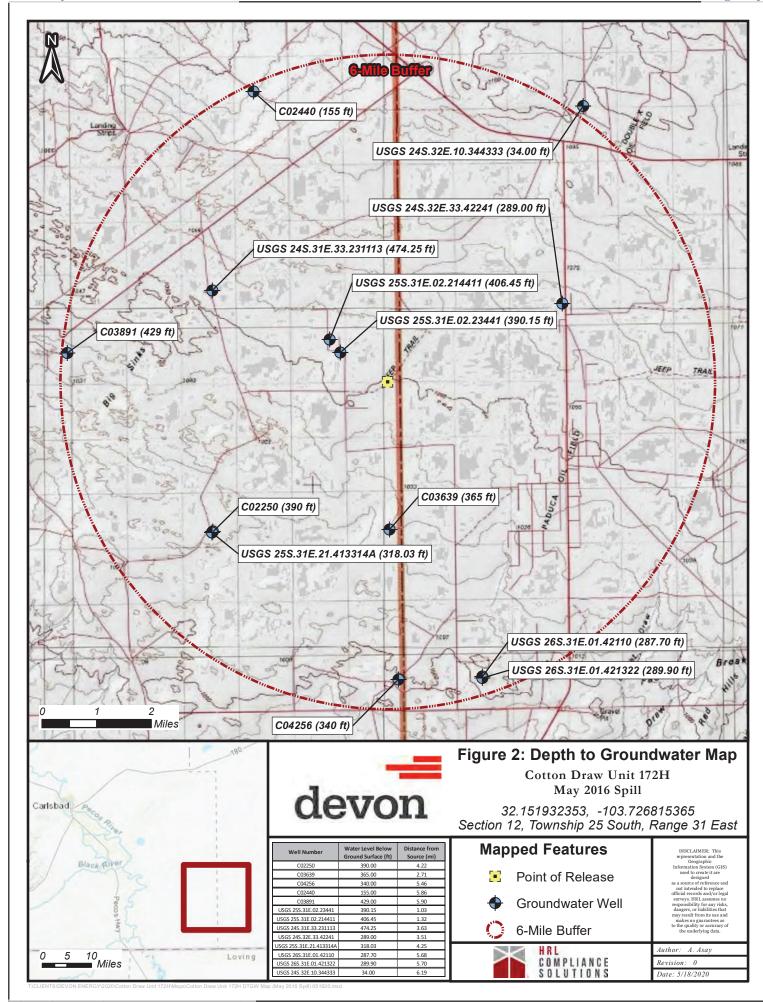
Attachment B: NMOCD Form C-141

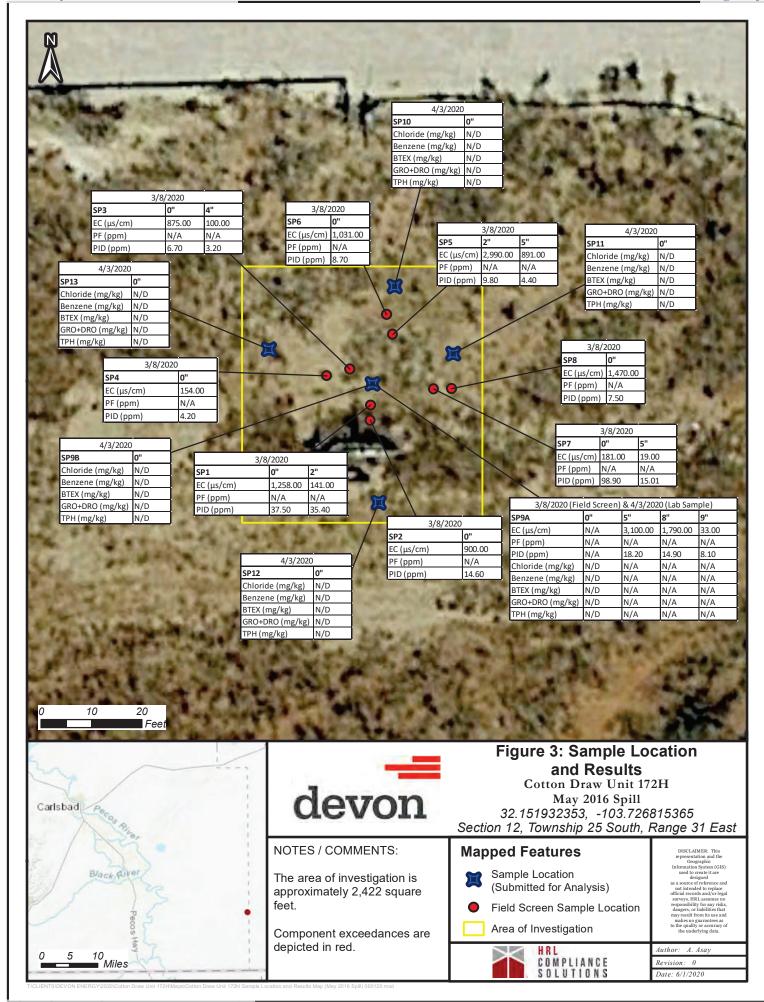
Attachment C: Analytical Laboratory Report



Figures









Tables



Table 1 Soil Sample Results Devon Energy Cotton Draw Unit 172H (May 2016) Eddy County, New Mexico

Sample ID	Depth (inches)	Sample Date	Chloride	Benzene	ВТЕХ	GRO + DRO	TPH
			Vai	lues are in mi	ligrams per k	ilogram (mg/l	kg)
	osure Crite ater than 1	ria (Groundwater 00 feet) *	1 20 000 1 10 1 50 1 1 000 1 3				
SP9A	0	4/3/2020	ND	ND	ND	ND	ND
SP9B	0	4/3/2020	ND	ND	ND	ND	ND
SP10	0	4/3/2020	ND	ND	ND	ND	ND
SP11	0	4/3/2020	ND	ND	ND	ND	ND
SP12	0	4/3/2020	ND	ND	ND	ND	ND
SP13	0	4/3/2020	ND	ND	ND	ND	ND

Notes:

NMOCD: New Mexico Oil Conservation Division BTEX: Benzene, Toluene, Ethylbenzene, Total Xylenes

GRO: Gasoline Range Organics DRO: Diesel Range Organics

TPH: Total Petroleum Hydrocarbons

Results shaded in grey exceed closure criteria

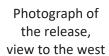
* Closure Criteria specified in 19.15.29.12 NMAC



Attachment A

Photographs







Photograph of the release, view to the east





Attachment B

NMOCD Form C-141

Form C-141

Revised August 8, 2011

<u>District I</u> 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.

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

					1100 1	9, 1 1111 0 7 0	<u> </u>					
Release Notification and Corrective Action												
						OPERA	ΓOR		Initia	ıl Report		Final Repor
Name of Company Devon Energy Production						ake Harrington,		on Foren	nan		-	
Address 6488 Seven Rivers Hwy Artesia, NM 88220					No. 432-214-5	175						
Facility Name Cotton Draw Unit 172H Facility Type Oil												
Surface Ov	vner Fede	ral		Mineral (Owner	Federal			API No	. 30-015-	42426	5
				LOCA	TIO	N OF REI	LEASE					
Unit Letter					Feet from the East/West Line County							
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			Lau	tude: 32.09094			ngitude: -103.4	+3383/				
T 4D 1				NAT	UKE	OF REL						
Type of Rele Produced wa						Volume of 20bbls	Release		Volume F Obbls	Recovered		
Source of Ro							Hour of Occurre			Hour of D	iscove	erv
Gasket between	een the valv					May 6, 201	16 @ 1:30 PM			16 @ 1:30		
Was Immed	iate Notice		1 x/ □	No □ Not Re		If YES, To						
			ı res _] NO [] NOT RE	equirea	Shelly Tuc Mike Brate						
By Whom?						Date and l						
Matt Nettles,	Asst. Produ	uction Forema	an			May 6, 2016 @ 2:30 Shelly Tucker, BLM May 6, 2016 @ 2:45 Mike Bratcher, OCD						
Was a Wata	маоника Ва	aahad?										
was a wate	Was a Watercourse Reached?											
	ourse was I	mpacted, Des	scribe Ful	ly.*		1						
N/A Describe Ca	use of Prob	olem and Ren	nedial Act	ion Taken *								
				valve and the pip	e. The	valves on eac	h side of the line	were imm	ediately s	hut so the l	ine co	uld be
bypassed to s	stop the wat	er flow. The	line is curr	ently out of service	ce waiti	ng on repairs.						
Describe Ar	ea Affected	l and Cleanu	n Action T	Taken *								
				of-way with 0bbl	s recov	ered. The rel	ease was in the ri	ght-of-wa	y South o	f location ir	n a 75'	' x 75' area.
All fluid rem	ained in the	right-of-way.	. An envir	onmental agency	will be	contacted for	remediation of th	ne affected	l area.			
I hereby cert	ify that the	information gi	iven above	is true and comp	lete to t	he best of my	knowledge and u	ınderstand	that purs	uant to NM	OCD	rules and
				nd/or file certain re								
				e of a C-141 repo								
				investigate and retance of a C-141								
		ws and/or regi		tance of a C-141	report u	oes not renev	e the operator or	responsio	ility for co	ompnance v	viiii ai	ly other
							OIL CON	SERVA	ATION	DIVISIO	ON	
Signature: S	heíla Fi	sher										
Printed Name	e· Sheila Fi	sher				Approved by	Environmental S	necialist				
Title: Field A	Admin Sup	port				Approval Dat	te:	Ех	xpiration l	Date:		
E-mail Addre	ess: Sheila.	Fisher@dvn.	com			Conditions of	f Approval:			Attached		
Date: 5/9/10	6	I	Phone: 575	5.748.1829						111111111111111111111111111111111111111		
		_		-								

^{*} Attach Additional Sheets If Necessary

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

State of New Mexico Energy Minerals and Natural Resources Department

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Form C-141 Revised August 24, 2018 Submit to appropriate OCD District office

Incident ID	nAB1613135426
District RP	2RP-3683
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>>100</u> (ft bgs)
Did this release impact groundwater or surface water?	☐ Yes ⊠ No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ⊠ No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes ⊠ No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ⊠ No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ⊠ No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ⊠ No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ⊠ No
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ⊠ No
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ⊠ No
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ⊠ No
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ⊠ No
Did the release impact areas not on an exploration, development, production, or storage site?	☐ Yes ⊠ No
	1

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

Characterization Report Checklist: Each of the following items must be included in the report.
Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
☐ Field data
Data table of soil contaminant concentration data
Depth to water determination
Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
Boring or excavation logs
Photographs including date and GIS information
Topographic/Aerial maps
Laboratory data including chain of custody

Received by OCD: 7/8/2020 10:19:04 AM State of New Mexico
Page 2 Oil Conservation Division

	Tuge 17 of 3
Incident ID	nAB1613135426
District RP	2RP-3683
Facility ID	
Application ID	

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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.

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: Tom Bynum	Title: EHS Consultant				
Signature: Tom Bynum	Date: 6/4/2020				
email: tom.bynum@dvn.com	Telephone: 575-748-0176				
OCD Only					
					
Received by:	Date:				

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Incident ID nAB1613135426
District RP 2RP-3683
Facility ID
Application ID

Closure

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

Closure Report Attachment Checklist: Each of the following	r items must be included in the closure report.						
Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)							
☐ Laboratory analyses of final sampling (Note: appropriate OI	OC District office must be notified 2 days prior to final sampling)						
□ Description of remediation activities							
and regulations all operators are required to report and/or file certamay endanger public health or the environment. The acceptance of should their operations have failed to adequately investigate and rehuman health or the environment. In addition, OCD acceptance of	ulations. The responsible party acknowledges they must substantially conditions that existed prior to the release or their final land use in						
Signature: Tom Bynum	Date: 6/4/2020						
email: tom.bynum@dvn.com	Telephone: 575-748-0176						
OCD Only							
Received by:	Date:						
	ty of liability should their operations have failed to adequately investigate and e water, human health, or the environment nor does not relieve the responsible d/or regulations.						
Closure Approved by: Hall	Date:11/3/2022						
Printed Name: Brittany Hall	Title: Environmental Specialist						



Attachment C Analytical Laboratory Results



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

OrderNo.: 2004247

April 13, 2020

Tom Bynum
Devon Energy
6488 Seven Rivers Highway
Artesia, NM 88210
TEL: (575) 748-0176

FAX:

RE: Cotton Draw 172H May 2016

Dear Tom Bynum:

Hall Environmental Analysis Laboratory received 6 sample(s) on 4/7/2020 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 www.hallenvironmental.com 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 qualifiers 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 #NM0901

Sincerely,

Andy Freeman

Laboratory Manager

anded

4901 Hawkins NE

Albuquerque, NM 87109

Date Reported: 4/13/2020

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Devon Energy Client Sample ID: SP9A

Project: Cotton Draw 172H May 2016 Collection Date: 4/3/2020 8:14:00 AM

Lab ID: 2004247-001 **Matrix:** SOIL **Received Date:** 4/7/2020 8:25:00 AM

Analyses	Result	RL Qu	al Units	DF	Date Analyzed
EPA METHOD 8015M/D: DIESEL RANGE OR	GANICS				Analyst: JME
Diesel Range Organics (DRO)	ND	9.6	mg/Kg	1	4/9/2020 5:20:08 PM
Motor Oil Range Organics (MRO)	ND	48	mg/Kg	1	4/9/2020 5:20:08 PM
Surr: DNOP	92.8	55.1-146	%Rec	1	4/9/2020 5:20:08 PM
EPA METHOD 8015D: GASOLINE RANGE					Analyst: RAA
Gasoline Range Organics (GRO)	ND	4.7	mg/Kg	1	4/9/2020 9:39:32 AM
Surr: BFB	95.8	66.6-105	%Rec	1	4/9/2020 9:39:32 AM
EPA METHOD 8021B: VOLATILES					Analyst: RAA
Benzene	ND	0.024	mg/Kg	1	4/9/2020 9:39:32 AM
Toluene	ND	0.047	mg/Kg	1	4/9/2020 9:39:32 AM
Ethylbenzene	ND	0.047	mg/Kg	1	4/9/2020 9:39:32 AM
Xylenes, Total	ND	0.094	mg/Kg	1	4/9/2020 9:39:32 AM
Surr: 4-Bromofluorobenzene	98.4	80-120	%Rec	1	4/9/2020 9:39:32 AM
EPA METHOD 300.0: ANIONS					Analyst: MRA
Chloride	ND	60	mg/Kg	20	4/9/2020 3:15:19 PM

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

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quanitative Limit
- S % Recovery outside of range due to dilution or matrix

- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Limit

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Date Reported: 4/13/2020

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Devon Energy Client Sample ID: SP9B

 Project:
 Cotton Draw 172H May 2016
 Collection Date: 4/3/2020 8:16:00 AM

 Lab ID:
 2004247-002
 Matrix: SOIL
 Received Date: 4/7/2020 8:25:00 AM

Result **RL Qual Units** DF **Date Analyzed Analyses EPA METHOD 8015M/D: DIESEL RANGE ORGANICS** Analyst: JME Diesel Range Organics (DRO) ND 9.4 mg/Kg 1 4/9/2020 5:44:06 PM Motor Oil Range Organics (MRO) ND 47 mg/Kg 1 4/9/2020 5:44:06 PM Surr: DNOP 99.5 55.1-146 %Rec 1 4/9/2020 5:44:06 PM **EPA METHOD 8015D: GASOLINE RANGE** Analyst: RAA Gasoline Range Organics (GRO) ND 4/9/2020 10:03:08 AM 4.8 mg/Kg 1 Surr: BFB 96.1 66.6-105 %Rec 1 4/9/2020 10:03:08 AM **EPA METHOD 8021B: VOLATILES** Analyst: RAA Benzene ND 0.024 mg/Kg 4/9/2020 10:03:08 AM 1 Toluene ND 0.048 mg/Kg 1 4/9/2020 10:03:08 AM Ethylbenzene ND 0.048 mg/Kg 1 4/9/2020 10:03:08 AM Xylenes, Total ND 0.096 mg/Kg 1 4/9/2020 10:03:08 AM Surr: 4-Bromofluorobenzene 97.8 80-120 %Rec 1 4/9/2020 10:03:08 AM **EPA METHOD 300.0: ANIONS** Analyst: MRA Chloride 4/9/2020 3:52:25 PM ND 60 mg/Kg 20

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

Qualifiers:

- Value exceeds Maximum Contaminant Level
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quanitative Limit
- S % Recovery outside of range due to dilution or matrix

- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Limit

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Date Reported: 4/13/2020

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Devon Energy Client Sample ID: SP10

 Project:
 Cotton Draw 172H May 2016
 Collection Date: 4/3/2020 8:21:00 AM

 Lab ID:
 2004247-003
 Matrix: SOIL
 Received Date: 4/7/2020 8:25:00 AM

Result **RL Qual Units** DF **Date Analyzed Analyses EPA METHOD 8015M/D: DIESEL RANGE ORGANICS** Analyst: JME Diesel Range Organics (DRO) ND 9.5 mg/Kg 1 4/9/2020 6:08:06 PM Motor Oil Range Organics (MRO) ND 48 mg/Kg 1 4/9/2020 6:08:06 PM Surr: DNOP 91.0 55.1-146 %Rec 1 4/9/2020 6:08:06 PM **EPA METHOD 8015D: GASOLINE RANGE** Analyst: RAA Gasoline Range Organics (GRO) ND 4/9/2020 10:26:42 AM 4.7 mg/Kg 1 Surr: BFB 95.4 66.6-105 %Rec 1 4/9/2020 10:26:42 AM **EPA METHOD 8021B: VOLATILES** Analyst: RAA Benzene ND 0.024 mg/Kg 4/9/2020 10:26:42 AM 1 Toluene ND 0.047 mg/Kg 1 4/9/2020 10:26:42 AM Ethylbenzene ND 0.047 mg/Kg 1 4/9/2020 10:26:42 AM Xylenes, Total ND 0.095 mg/Kg 1 4/9/2020 10:26:42 AM Surr: 4-Bromofluorobenzene 98.1 80-120 %Rec 1 4/9/2020 10:26:42 AM **EPA METHOD 300.0: ANIONS** Analyst: MRA Chloride 4/9/2020 4:04:45 PM ND 60 mg/Kg 20

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

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quanitative Limit
- S % Recovery outside of range due to dilution or matrix

- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Limit

Page 3 of 10

Date Reported: 4/13/2020

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Devon Energy Client Sample ID: SP11

 Project:
 Cotton Draw 172H May 2016
 Collection Date: 4/3/2020 8:26:00 AM

 Lab ID:
 2004247-004
 Matrix: SOIL
 Received Date: 4/7/2020 8:25:00 AM

Result **RL Qual Units** DF **Date Analyzed Analyses EPA METHOD 8015M/D: DIESEL RANGE ORGANICS** Analyst: JME Diesel Range Organics (DRO) ND 9.8 mg/Kg 1 4/9/2020 6:31:52 PM Motor Oil Range Organics (MRO) ND 49 mg/Kg 1 4/9/2020 6:31:52 PM Surr: DNOP 96.9 55.1-146 %Rec 1 4/9/2020 6:31:52 PM **EPA METHOD 8015D: GASOLINE RANGE** Analyst: RAA Gasoline Range Organics (GRO) ND 4/9/2020 10:50:06 AM 4.9 mg/Kg 1 Surr: BFB 95.5 66.6-105 %Rec 1 4/9/2020 10:50:06 AM **EPA METHOD 8021B: VOLATILES** Analyst: RAA Benzene ND 0.025 mg/Kg 4/9/2020 10:50:06 AM 1 Toluene ND 0.049 mg/Kg 1 4/9/2020 10:50:06 AM Ethylbenzene ND 0.049 mg/Kg 1 4/9/2020 10:50:06 AM Xylenes, Total ND 0.099 mg/Kg 1 4/9/2020 10:50:06 AM Surr: 4-Bromofluorobenzene 98.3 80-120 %Rec 1 4/9/2020 10:50:06 AM **EPA METHOD 300.0: ANIONS** Analyst: MRA Chloride 4/9/2020 4:17:06 PM ND 60 mg/Kg 20

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

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quanitative Limit
- S % Recovery outside of range due to dilution or matrix

- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Limit

Page 4 of 10

Date Reported: 4/13/2020

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Devon Energy Client Sample ID: SP12

 Project:
 Cotton Draw 172H May 2016
 Collection Date: 4/3/2020 8:28:00 AM

 Lab ID:
 2004247-005
 Matrix: SOIL
 Received Date: 4/7/2020 8:25:00 AM

Result **RL Qual Units** DF **Analyses Date Analyzed EPA METHOD 8015M/D: DIESEL RANGE ORGANICS** Analyst: JME Diesel Range Organics (DRO) ND 9.2 mg/Kg 1 4/9/2020 6:55:35 PM Motor Oil Range Organics (MRO) ND 46 mg/Kg 1 4/9/2020 6:55:35 PM Surr: DNOP 99.0 55.1-146 %Rec 1 4/9/2020 6:55:35 PM **EPA METHOD 8015D: GASOLINE RANGE** Analyst: RAA Gasoline Range Organics (GRO) ND 4/9/2020 11:13:27 AM 5.0 mg/Kg 1 Surr: BFB 95.1 66.6-105 %Rec 1 4/9/2020 11:13:27 AM **EPA METHOD 8021B: VOLATILES** Analyst: RAA Benzene ND 0.025 mg/Kg 4/9/2020 11:13:27 AM 1 Toluene ND 0.050 mg/Kg 1 4/9/2020 11:13:27 AM Ethylbenzene ND 0.050 mg/Kg 1 4/9/2020 11:13:27 AM Xylenes, Total ND 0.099 mg/Kg 1 4/9/2020 11:13:27 AM Surr: 4-Bromofluorobenzene 99.3 80-120 %Rec 1 4/9/2020 11:13:27 AM **EPA METHOD 300.0: ANIONS** Analyst: MRA Chloride 4/9/2020 4:29:27 PM ND 60 mg/Kg 20

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

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quanitative Limit
- S % Recovery outside of range due to dilution or matrix

- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Limit

Page 5 of 10

Date Reported: 4/13/2020

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Devon Energy Client Sample ID: SP13

 Project:
 Cotton Draw 172H May 2016
 Collection Date: 4/3/2020 8:29:00 AM

 Lab ID:
 2004247-006
 Matrix: SOIL
 Received Date: 4/7/2020 8:25:00 AM

Result **RL Qual Units** DF **Analyses Date Analyzed EPA METHOD 8015M/D: DIESEL RANGE ORGANICS** Analyst: JME Diesel Range Organics (DRO) ND 9.3 mg/Kg 1 4/9/2020 7:19:10 PM Motor Oil Range Organics (MRO) ND 47 mg/Kg 1 4/9/2020 7:19:10 PM Surr: DNOP 93.1 55.1-146 %Rec 1 4/9/2020 7:19:10 PM **EPA METHOD 8015D: GASOLINE RANGE** Analyst: RAA Gasoline Range Organics (GRO) ND 4/9/2020 11:36:49 AM 4.9 mg/Kg 1 Surr: BFB 96.5 66.6-105 %Rec 1 4/9/2020 11:36:49 AM **EPA METHOD 8021B: VOLATILES** Analyst: RAA Benzene ND 0.024 mg/Kg 4/9/2020 11:36:49 AM 1 Toluene ND 0.049 mg/Kg 1 4/9/2020 11:36:49 AM Ethylbenzene ND 0.049 mg/Kg 1 4/9/2020 11:36:49 AM Xylenes, Total ND 0.097 mg/Kg 1 4/9/2020 11:36:49 AM Surr: 4-Bromofluorobenzene 99.4 80-120 %Rec 1 4/9/2020 11:36:49 AM **EPA METHOD 300.0: ANIONS** Analyst: MRA Chloride 4/9/2020 4:41:48 PM ND 61 mg/Kg 20

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

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quanitative Limit
- S % Recovery outside of range due to dilution or matrix

- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Limit

Page 6 of 10

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **2004247** *13-Apr-20*

Client: Devon Energy

Project: Cotton Draw 172H May 2016

Sample ID: MB-51683 SampType: mblk TestCode: EPA Method 300.0: Anions

Client ID: PBS Batch ID: 51683 RunNo: 68004

Prep Date: 4/9/2020 Analysis Date: 4/9/2020 SeqNo: 2350088 Units: mg/Kg

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

Chloride ND 1.5

Qualifiers:

Value exceeds Maximum Contaminant Level.

D Sample Diluted Due to Matrix

H Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

PQL Practical Quanitative Limit

S % Recovery outside of range due to dilution or matrix

B Analyte detected in the associated Method Blank

E Value above quantitation range

Analyte detected below quantitation limits

P Sample pH Not In Range

RL Reporting Limit

Page 7 of 10

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

3.6

WO#: **2004247**

13-Apr-20

Client: Devon Energy

Surr: DNOP

Project: Cotton Draw 172H May 2016

Sample ID: LCS-51627 SampType: LCS TestCode: EPA Method 8015M/D: Diesel Range Organics

Client ID: LCSS Batch ID: 51627 RunNo: 67934

Prep Date: 4/7/2020 Analysis Date: 4/8/2020 SeqNo: 2347744 Units: mg/Kg

5.000

Analyte Result **PQL** SPK value SPK Ref Val %REC LowLimit HighLimit %RPD **RPDLimit** Qual Diesel Range Organics (DRO) 0 41 10 50.00 81.7 70 130

71.9

55.1

146

Sample ID: MB-51627 SampType: MBLK TestCode: EPA Method 8015M/D: Diesel Range Organics

Client ID: **PBS** Batch ID: **51627** RunNo: **67934**

Prep Date: 4/7/2020 Analysis Date: 4/8/2020 SeqNo: 2347745 Units: mg/Kg

Analyte Result 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 7.3 10.00 72.5 55.1 146

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quanitative Limit
- S % Recovery outside of range due to dilution or matrix

- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Limit

Page 8 of 10

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **2004247** *13-Apr-20*

Client: Devon Energy

Project: Cotton Draw 172H May 2016

Sample ID: mb-51623 SampType: MBLK TestCode: EPA Method 8015D: Gasoline Range

Client ID: PBS Batch ID: 51623 RunNo: 67938

Prep Date: 4/7/2020 Analysis Date: 4/9/2020 SeqNo: 2348375 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 970 1000 96.8 66.6 105

Sample ID: Ics-51623 SampType: LCS TestCode: EPA Method 8015D: Gasoline Range

Client ID: LCSS Batch ID: 51623 RunNo: 67938

Prep Date: 4/7/2020 Analysis Date: 4/9/2020 SeqNo: 2348376 Units: mg/Kg

Analyte Result **PQL** SPK value SPK Ref Val %REC LowLimit HighLimit %RPD **RPDLimit** Qual Gasoline Range Organics (GRO) 5.0 25.00 n 96.8 80 120 S Surr: BFB 1100 1000 66.6 105 111

Sample ID: Ics-51628 SampType: LCS TestCode: EPA Method 8015D: Gasoline Range

Client ID: LCSS Batch ID: 51628 RunNo: 68006

Prep Date: 4/7/2020 Analysis Date: 4/9/2020 SeqNo: 2350206 Units: %Rec

SPK value SPK Ref Val %REC %RPD **RPDLimit** Analyte Result PQL LowLimit HighLimit Qual Surr: BFB 1100 1000 108 66.6 S

Sample ID: mb-51628 SampType: MBLK TestCode: EPA Method 8015D: Gasoline Range

Client ID: PBS Batch ID: 51628 RunNo: 68006

Prep Date: 4/7/2020 Analysis Date: 4/9/2020 SeqNo: 2350208 Units: %Rec

Analyte Result PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD RPDLimit Qual Surr: BFB 970 1000 97.0 66.6 105

Qualifiers:

Value exceeds Maximum Contaminant Level.

D Sample Diluted Due to Matrix

H Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

PQL Practical Quanitative Limit

S % Recovery outside of range due to dilution or matrix

B Analyte detected in the associated Method Blank

E Value above quantitation range

J Analyte detected below quantitation limits

P Sample pH Not In Range

RL Reporting Limit

Page 9 of 10

OC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **2004247**

13-Apr-20

Client: Devon Energy

Project: Cotton Draw 172H May 2016

Sample ID: mb-51623 SampType: MBLK TestCode: EPA Method 8021B: Volatiles Client ID: PBS Batch ID: 51623 RunNo: 67938 Prep Date: 4/7/2020 Analysis Date: 4/9/2020 SeqNo: 2348410 Units: mg/Kg Analyte Result **PQL** SPK value SPK Ref Val %REC LowLimit HighLimit %RPD **RPDLimit** Qual Benzene ND 0.025 Toluene ND 0.050 Ethylbenzene ND 0.050 Xylenes, Total ND 0.10 Surr: 4-Bromofluorobenzene 0.99 1.000 99.4 80 120

Sample ID: LCS-51623 SampType: LCS TestCode: EPA Method 8021B: Volatiles Batch ID: 51623 Client ID: LCSS RunNo: 67938 Analysis Date: 4/9/2020 Prep Date: 4/7/2020 SeqNo: 2348411 Units: mg/Kg Analyte **PQL** SPK value SPK Ref Val %REC HighLimit %RPD **RPDLimit** Result LowLimit Qual 1.000 0.88 0.025 0 87.6 80 120 Benzene Toluene 0.91 0.050 1.000 0 91.4 80 120 Ethylbenzene 0.050 1.000 0 94.4 80 120 0.94 0 Xylenes, Total 2.9 0.10 3.000 95.6 80 120 Surr: 4-Bromofluorobenzene 1.0 1.000 103 80 120

Sample ID: LCS-51628 SampType: LCS TestCode: EPA Method 8021B: Volatiles Client ID: LCSS Batch ID: 51628 RunNo: 68006 Prep Date: 4/7/2020 Analysis Date: 4/9/2020 SeqNo: 2350255 Units: %Rec SPK value SPK Ref Val Result **PQL** %REC LowLimit HighLimit %RPD **RPDLimit** Qual Surr: 4-Bromofluorobenzene 1.0 1.000 101 80 120

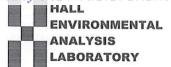
Sample ID: mb-51628 SampType: MBLK TestCode: EPA Method 8021B: Volatiles Client ID: **PBS** Batch ID: 51628 RunNo: 68006 Prep Date: 4/7/2020 Analysis Date: 4/9/2020 SeqNo: 2350257 Units: %Rec %RPD %REC **RPDLimit** PQL SPK value SPK Ref Val HighLimit Qual Analyte Result LowLimit Surr: 4-Bromofluorobenzene 0.99 1.000 99.2 120 80

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quanitative Limit
- S % Recovery outside of range due to dilution or matrix

- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Limit

Page 10 of 10



Hall Environmental Analysis Laboratory 4901 Hawkins NE Albuquerque, NM 87109

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

Sample Log-In Check List

CI	ent Name:	DEVON EN	ERGY	Work	Order Number	200	4247			RcptNo	: 1	
Re	ceived By:	Juan Roja	s	4/7/2020	0 8:25:00 AM			Hun	wang.			
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	viewed By:	LB	•	471				Load) Bae	4		
<u>Ch</u>	ain of Cus	<u>tody</u>										
1.	ls Chain of Cu	ustody sufficie	ently complete	?		Yes	\checkmark	N	o 🗌	Not Present		
2.	How was the	sample delive	ered?			Clie	<u>nt</u>					
Lo	g In											
		pt made to co	ool the sample	s?		Yes	V	N	o 🗌	NA 🗌		
4. \	Vere all samp	les received	at a temperatu	re of >0° C t	o 6.0°C	Yes	V	N	o 🗌	NA 🗆		
5. :	Sample(s) in p	oroper contain	ner(s)?			Yes	V	N	o 🗌			
6. 5	Sufficient sam	ple volume fo	or indicated tes	t(s)?		Yes	V	No				
7. <i>F</i>	re samples (e	except VOA a	and ONG) prop	erly preserve	d?	Yes	\checkmark	No				
8. V	Vas preservat	tive added to	bottles?			Yes		No	V	NA 🗌		
9. F	Received at lea	ast 1 vial with	headspace <	1/4" for AQ V	OA?	Yes		No		NA 🗸		
10.\	Nere any sam	nple containe	rs received bro	ken?		Yes		No	V	# of		-
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	oes paperwo					Yes	\checkmark	No	· 🗆	for pH:	/10 1	-15
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	Regardi	Regarding:										
	Client Instructions:					***********						
16.	Additional ren	narks:								****	_1	
17	Cooler Inform	mation										
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Received by OCD: 7/8/2020	0:19:04 AM	Page 32 of 33
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IALL ENVIRONMEN INALYSIS LABORAT www.hallenvironmental.com ns NE - Albuquerque, NM 87109 15-3975 Fax 505-345-4107 Analysis Request	Total Coliform (Present/Absent)	ad on the
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Released to Imaging: 11/3/2	22 7:48:40 AM	

District I
1625 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720

District II

811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720 District III 1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS

Action 9123

CONDITIONS

Operator:	OGRID:
Pima Environmental Services, LLC	329999
5614 N Lovington Hwy	Action Number:
Hobbs, NM 88240	9123
	Action Type:
	[C-141] Release Corrective Action (C-141)

CONDITIONS

Create By	d Condition	Condition Date
bhal	None None	11/3/2022