

December 15, 2022

District Supervisor Oil Conservation Division, District 1 1625 North French Drive Hobbs, New Mexico 88240

Re: REVISED Release Characterization and Remediation Work Plan ConocoPhillips Heritage Concho Roy Batty Federal Com #003H Flange Release Unit Letter O, Section 11, Township 24 South, Range 33 East Lea County, New Mexico Incident ID NOY1811735138

Dear Sir or Madam:

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips Company (COPC) to assess a historical release that occurred from a line in the vicinity of the Roy Batty Federal Com #003H (API# 30-025-41333) lease pad. The approximate release site coordinates are 32.225991°, -103.541391°, located in the Public Land Survey System (PLSS) Unit Letter O, Section 11, Township 24 South, Range 33 East, Lea County, New Mexico (Site). The Site location is shown on Figures 1 and 2. The site is located on privately owned land.

### BACKGROUND

According to the State of New Mexico Oil Conservation Division (NMOCD) C-141 Initial Report (Appendix A), the release was discovered on April 21, 2018. The release occurred due to a leak on a corroded flange coupler. Approximately 60 barrels (bbls) of produced water were released, of which 50 bbls were reported recovered. The NMOCD received the initial C-141 on April 27, 2018, and subsequently assigned the release the Remediation Permit (RP) number 1RP-5029 and the Incident ID NOY1811735138.

The Roy Batty Federal Com #003H Flange Release (1RP-5029/ NOY1811735138) is included in an Agreed Compliance Order ("ACO") with the NMOCD, related to unresolved releases from COPC's predecessor-ininterest ("COG"). The ACO required COPC to submit characterization and/or remediation plans with proposed timeframes for the ongoing corrective actions or remediations identified to the NMOCD no later than March 31, 2022. As of March 11, 2022, COPC has submitted characterization and remediation plans for all of the properties identified and owned. All documentation was submitted in accordance with ACO terms. These documents have been submitted to the NMOCD via CentreStack, a Secure Access & File Sharing platform, at the direction of Mr. Bradford Billings, NMOCD. The Delineation Workplan previously completed by BBC was included as a portion of the ACO.

As of November 21, 2022, the BBC Delineation Workplan had not been approved nor rejected by the NMOCD. Therefore, the workplan was resubmitted via the NMOCD Fee Application Portal. On December 2, 2022, the NMOCD rejected the BBC Delineation Workplan via email from Brittany Hall. The following reasoning for rejection was included in the email:

- "The depth to groundwater has not been adequately determined. When nearby wells are used to determine depth to groundwater, the wells should be no further than ½ mile away from the site, and data should be no more than 25 years old, and well construction information should be provided in the submission. The responsible party may choose to remediate to the most stringent levels listed in Table 1 of 19.15.29 NMAC in lieu of drilling to determine the depth to groundwater.
- 1RP-5029 closed. Refer to incident #nOY1811735138 in all future communications.
- Base and sidewalls samples will need to be representative of no more than 200 square feet and analyzed for all constituents in Table I.
- Please submit a complete report through the OCD Permitting website by 3/3/2023."

Regulatory correspondence and a copy of the BBC Delineation Workplan is included as Appendix B.

### **REVISED SITE CHARACTERIZATION**

Based on the OCD rejection, a site characterization was performed and no watercourses, sinkholes, residences, schools, hospitals, institutions, churches, springs, private domestic water wells, playa lakes, wetlands, incorporated municipal boundaries, subsurface mines, or floodplains are located within the distances specified in 19.15.29 New Mexico Administrative Code (NMAC). The Site is within a New Mexico oil and gas production area.

According to the New Mexico Office of the State Engineers (NMOSE) reporting system, there are no water wells within an 800-meter radius (approximately ½ mile) of the Site. There is one (1) water well within 1,600 meters (approximately 1 mile) of the Site with a depth to groundwater of 420 feet below ground surface (bgs). As the available water level information was from a well further than ½ mile away from the Site, COP reviewed adjacent incident release sites with approved reports for possibility of associated borings which could provide a means for determining depth to groundwater in the vicinity of NOY1811735138 release area. As such, subsurface data from the Tyrell Fee #1 Release (NRM2019952683) was reviewed.

On July 30, 2022, a licensed drilling subcontractor was contracted to a drill a borehole (DTW) to 55 feet bgs as part of the characterization associated with the Tyrell Fee #1 Release (NRM2019952683) which was granted closure by the NMOCD. The DTW boring is located in the northeastern corner of the existing Roy Batty Federal Com #003H lease pad. The borehole was dry upon completion, and soils were dry from surface to total depth. The depth to groundwater in the area was thus verified as greater than 55 feet bgs. The borehole was plugged with 3/8" bentonite chips. The borehole coordinates are 32.225714°, - 103.540550°, and the boring location is indicated on Figure 3. The site characterization data, along with the boring log, is included in Appendix C.

### **REGULATORY FRAMEWORK**

Based upon the release footprint and in accordance with Subsection E of 19.15.29.12 NMAC, per 19.15.29.11 NMAC, the site characterization data was used to determine recommended remedial action levels (RRALs) for benzene, toluene, ethylbenzene, and xylene (collectively referred to as BTEX), total petroleum hydrocarbons (TPH), and chlorides in soil.

Based on the site characterization, the established depth to water, and in accordance with Table I of 19.15.29.12 NMAC, the RRALs for the Site are as follows:

Constituent	Site RRAL
Chloride	10,000 mg/kg
TPH (GRO+DRO+ORO)	2,500 mg/kg
TPH (GRO+DRO)	1,000 mg/kg
BTEX	50 mg/kg

Additionally, in accordance with the NMOCD guidance *Procedures for Implementation of the Spill Rule* (19.15.29 NMAC) (September 6, 2019), the following reclamation requirements for surface soils (0-4 feet bgs) outside of active oil and gas operations are as follows:

REVISED Release Characterization and Remediation Work Plan December 15, 2022

Constituent	<b>Reclamation Requirement</b>
Chloride	600 mg/kg
TPH (GRO+DRO+ORO)	100 mg/kg
BTEX	50 mg/kg

### SITE ASSESSMENT AND WORK PLAN

According to information provided by COPC, BBC International, Incorporated (BBC) was initially contracted to map the extent and sample the release footprint and the surrounding area. Based upon the mapped initial extent provided by BBC, the release footprint was approximately 6,050 square feet of lease pad, lease road and adjacent pastureland.

On June 6 and 7, 2018, BBC installed ten (10) borings (SP1 through SP10) within the release footprint to a maximum depth of 9 feet bgs. Additionally, four (4) borings were completed (North, East, South, West) in the cardinal directions to establish horizontal delineation. A total of twenty-eight (28) samples were collected from the sample locations and transferred under chain of custody to Cardinal Laboratories (Cardinal). All soil samples were analyzed for chloride via Method SM4500CI-B. Selected samples were analyzed for TPH via Method 8015 Modified and BTEX via Method 8021B. A copy of the laboratory analytical report and chain-of-custody documentation are included as part of the BBC Delineation Workplan in Appendix B.

Analytical results associated with SP6 through SP10 indicated chloride concentrations above reclamation requirements for surface soils outside of oil and gas production areas. There was one RRAL exceedance for chloride at SP6 (4'). All other sample results were below RRALs and reclamation requirements for surface soils outside of oil and gas production areas.

BBC was able to confirm horizontal and vertical delineation with their assessment activities. Based on the results of the assessment activities, a Delineation Workplan was completed by BBC and submitted to NMOCD, on behalf of COG, via email in 2018. The same Workplan was resubmitted to NMOCD via email in January 2019. As mentioned previously, the workplan did not provide adequate determination of depth to groundwater. A copy of the BBC Delineation Workplan and associated email correspondence is included in Appendix B.

### VISUAL SITE INSPECTION

On behalf of COPC, Tetra Tech personnel conducted a visual inspection of the Site on September 21, 2022 to assess current conditions and look for evidence of the reported release. No visual signs of the release were observed on the lease pad or lease road. Areas of sparse vegetation were observed along the likely release flow path. Photographic documentation from the visual inspection is included as Appendix D.

### **REMEDIATION WORK PLAN**

Based on the analytical results from the BBC assessment activities the OCD rejection, and the revised site characterization, impacted material within the release extent is proposed to be removed as indicated in Figure 4. Impacted soils will be excavated to a maximum depth of 4 feet below the surrounding surface or until a representative sample from the walls and bottom of the excavation is below the Site RRALs and/or reclamation requirements for surface soils (0-4 feet bgs) outside of active oil and gas operations. Heavy equipment (backhoe and trackhoe) will be utilized to excavate areas outside the immediate vicinity of pressurized lines and will come no more than 4 feet from any pressurized lines. Impacted soils within the vicinity of the surface and subsurface lines will be dug by hand to the maximum extent practicable.

Excavated soils will be transported offsite and disposed of at an NMOCD-approved or permitted facility. Confirmation bottom and sidewall samples will be collected for verification of remedial activities, and analyzed for TPH, BTEX, and chlorides. In accordance with Subsection D of 19.15.29.12 NMAC, the

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responsible party will notify the appropriate division district office prior to conducting confirmation sampling. The estimated volume of material to be remediated is approximately 600 cubic yards.

In accordance with the NMOCD rejection email included in Appendix B, COPC will collect confirmation samples within the excavated areas to verify remedial efficacy. These confirmation sidewall and floor samples will be representative of no more than approximately 200 square feet of excavated area. The proposed confirmation sample locations are depicted in Figure 5. Approximately ten (10) confirmation floor samples and twenty-one (21) confirmation sidewall samples are proposed in the excavation area. This is a total of 31 confirmation sample locations. The proposed excavation encompasses an area of approximately 6,050 square feet. This Confirmation Sampling Plan meets the stipulations found in the NMOCD rejection. The appropriate division district office will be notified two business days prior to conducting final sampling. Confirmation samples will be sent to an accredited laboratory for analysis of TPH, BTEX, and chlorides.

### SITE RECLAMATION AND RESTORATION PLAN

Once acceptable confirmation sample results are received, the excavation will then be backfilled with clean material to surface grade. The backfilled areas within the off-pad pasture area will be seeded in the first favorable growing season to aid in revegetation. Based on the location of the Site, the seed mixture for LPC Sand/Shinnery Sites will be used for seeding and will be planted in the amount specified in the pounds pure live seed (PLS) per acre. The seed mixture will be spread by a drill equipped with a depth regulator or a hand-held broadcaster and raked. If a hand-held broadcaster is used for dispersal, the pounds pure live seed per acre will be doubled.

Site inspections will be performed to assess the revegetation progress and evaluate the site for the presence of primary or secondary noxious weeds. If noxious weeds are identified, the BLM and/or private landowner will be contacted to determine an effective method for eradication. If the site does not show revegetation after one growing season, the area will be reseeded as appropriate. The BLM seed mixture details and corresponding pounds pure live seed per acre are included in Appendix E.

#### CONCLUSION

Remediation activities at the Site are proposed to begin within 90 days of NMOCD plan approval. Upon completion of the proposed work, a final closure report detailing the remediation activities and the results of the confirmation sampling will be submitted to NMOCD. The area shall be reclaimed in accordance with 19.15.29.13 NMAC and the BLM. The completed C-141 forms are enclosed in Appendix A.

If you have any questions concerning the revised site characterization or the proposed remediation activities for the Site, please call me at (512) 338-2861.

Sincerely, Tetra Tech, Inc.

Christian M. Llull, P.G. Project Manager

cc: Mr. Ike Tavarez, RMR – ConocoPhillips

### LIST OF ATTACHMENTS

### Figures:

Figure 1 – Site Location Map

Figure 2 – Topographic Map

Figure 3 – Approximate Release Extent and Site Assessment

Figure 4 – Proposed Remediation Extents

Figure 5 – Confirmation Sampling Plan

#### Tables:

Table 1 – Summary of Analytical Results – 2018 Soil Assessment

### Appendices:

Appendix A – C-141 Forms

Appendix B – Regulatory Correspondence & Delineation Workplan (BBC International Incorporated, 2018)

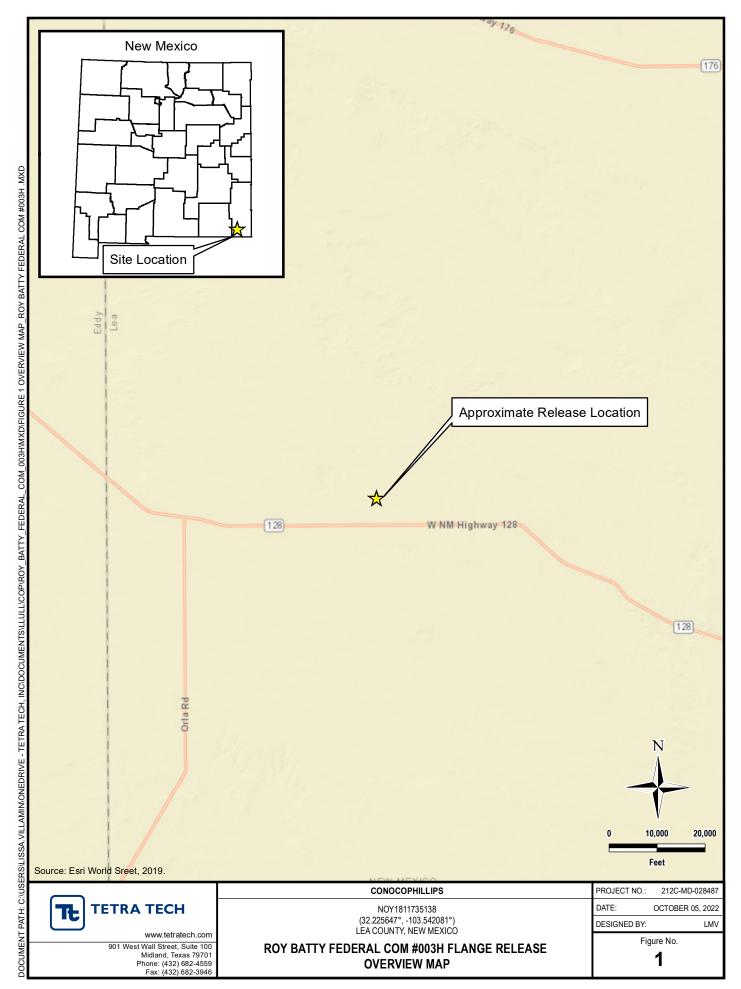
Appendix C – Site Characterization Data

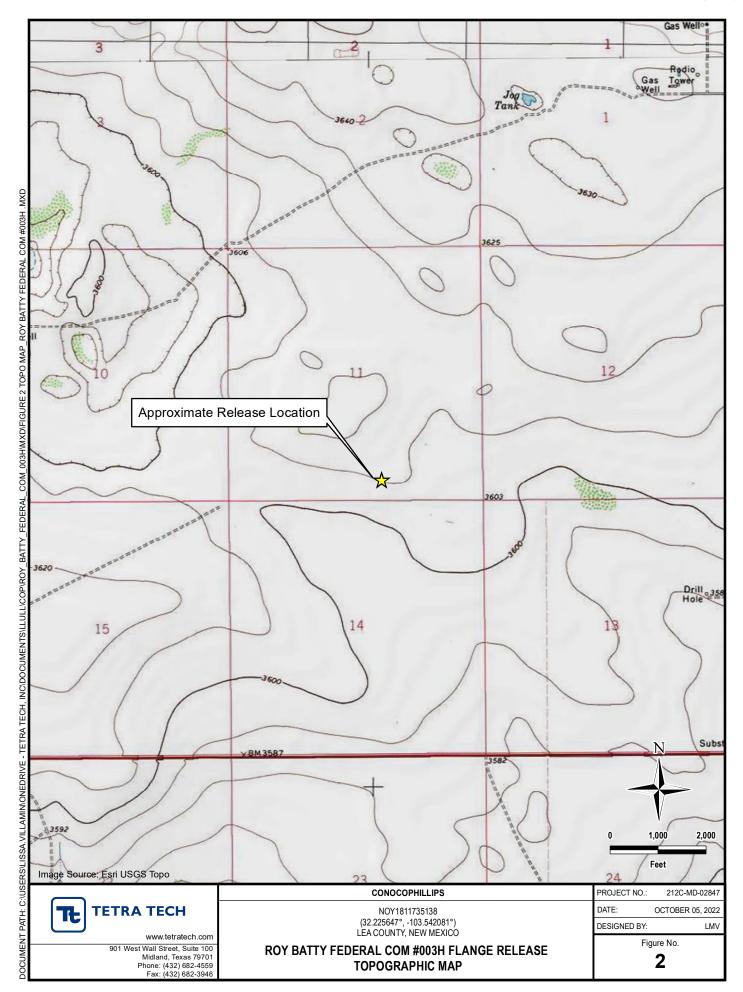
Appendix D – Seed Mixture Details

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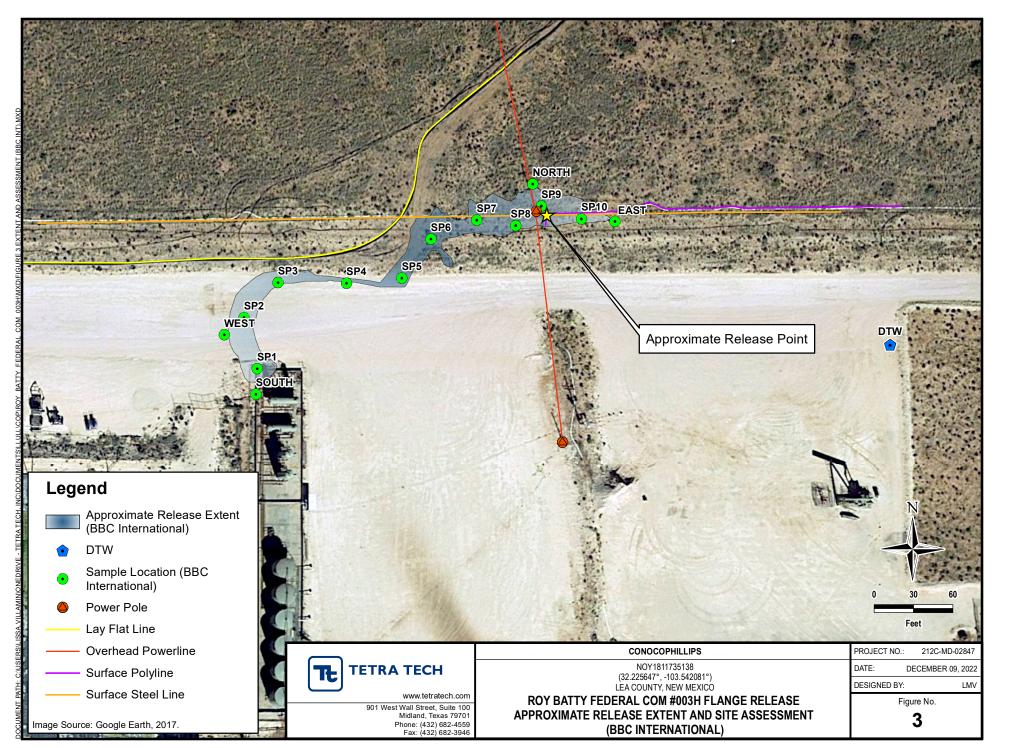
ConocoPhillips

# FIGURES

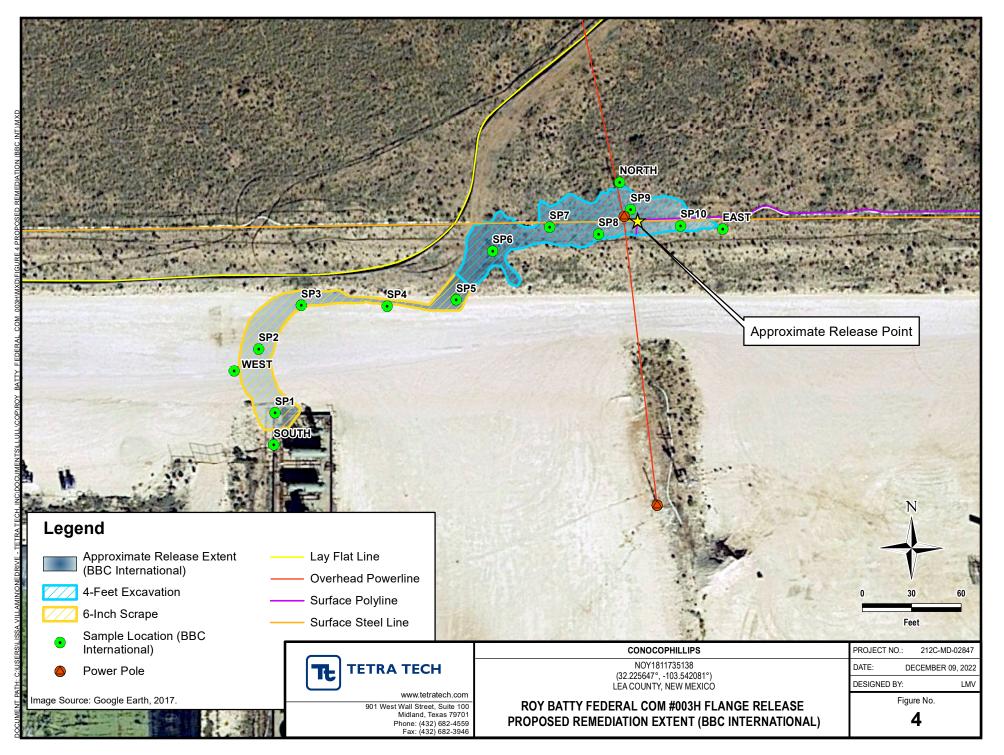


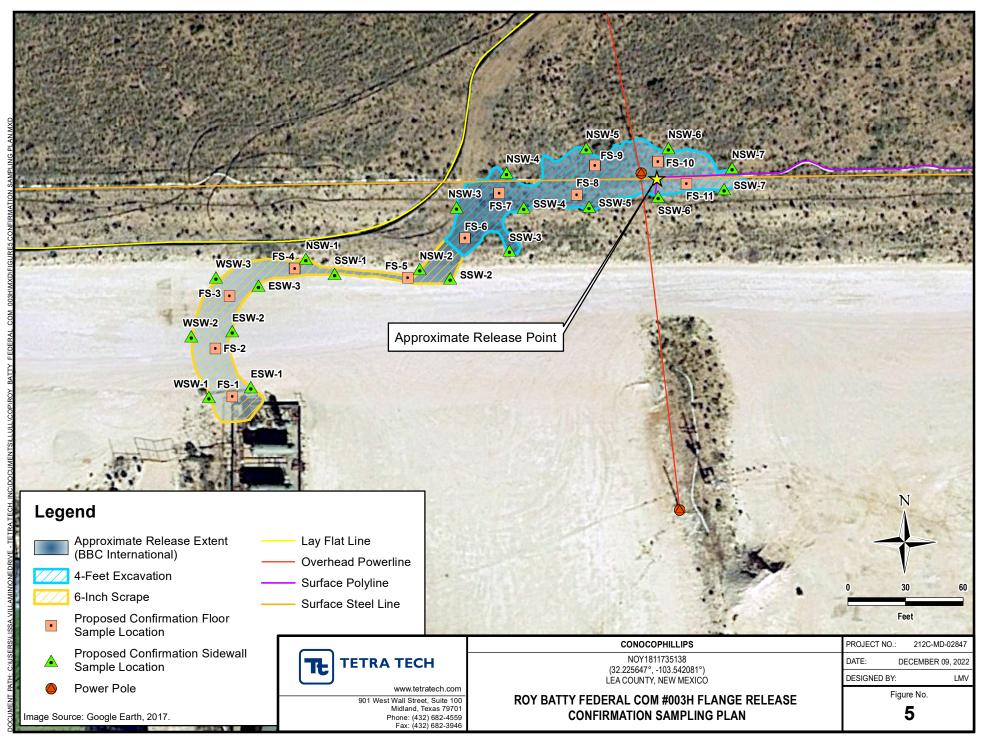


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# TABLES

#### TABLE 1 SUMMARY OF ANALYTICAL RESULTS 2018 SOIL ASSESSMENT - nOY1811735138 CONOCOPHILLIPS ROY BATTY FEDERAL COM #003H RELEASE LEA COUNTY, NM

<b></b>	1								BTEX	2								ТР	'H <sup>3</sup>		
Sample ID	Sample Date	Sample Depth Interval	Chlorid	le <sup>1</sup>	Benzer	ne	Toluer	ne	Ethylben	zene	Total Xyl	enes	Total B	ТЕХ	GRO	1	DRO		EXT DF	RO	Total TPH (GRO+DRO+EXT DRO)
		ft. bgs	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg
SP1	6/6/2018	1	48.0		< 0.050		< 0.050		< 0.050		< 0.150		< 0.300		< 10.0		< 10.0		< 10.0		-
51 1	0,0,2010	6	80.0		NA		NA		NA		NA		NA		NA		NA		NA		-
SP2	6/6/2018	1	160		< 0.050		< 0.050		< 0.050		< 0.150		< 0.300		< 10.0		< 10.0		< 10.0		-
512	0/0/2010	6	112		NA		NA		NA		NA		NA		NA		NA		NA		-
SP3	6/6/2018	1	32.0		< 0.050		< 0.050		< 0.050		< 0.150		< 0.300		< 10.0		< 10.0		< 10.0		-
353	0/0/2018	6	32.0		NA		NA		NA		NA		NA		NA		NA		NA		-
SP4	6/6/2018	1	176		< 0.050		< 0.050		< 0.050		< 0.150		< 0.300		< 10.0		< 10.0		< 10.0		-
364	0/0/2018	6	224		NA		NA		NA		NA		NA		NA		NA		NA		-
		1	624	1	< 0.050		< 0.050		< 0.050	1	< 0.150	1	< 0.300		< 10.0	1	< 10.0	1	< 10.0		-
SP5	6/6/2018	2	176		NA		NA		NA		NA		NA		NA		NA		NA		-
		7	256		NA		NA		NA		NA		NA		NA		NA		NA		-
		1	5,600	QM-07	< 0.050		< 0.050		< 0.050		< 0.150		< 0.300		< 10.0		< 10.0		< 10.0		-
		4	20,400		NA		NA		NA		NA		NA		NA		NA		NA		-
SP6	6/6/2018	6	6,660		NA		NA		NA		NA		NA		NA		NA		NA		-
		8	1,660		NA		NA		NA		NA		NA		NA		NA		NA		-
		9	176		NA		NA		NA		NA		NA		NA		NA		NA		-
SP7	6/6/2018	1	4,320		< 0.050		< 0.050		< 0.050		< 0.150		< 0.300		< 10.0		< 10.0		< 10.0		-
517	6/7/2018	4	2,400		NA		NA		NA		NA		NA		NA		NA		NA		-
600	6/7/2010	1	5,680		< 0.050		< 0.050		< 0.050		< 0.150		< 0.300		< 10.0		< 10.0		< 10.0		-
SP8	6/7/2018	4	1,720		NA		NA		NA		NA		NA		NA		NA		NA		-
SP9	6/7/0010	1	7,200		< 0.050		< 0.050		< 0.050		< 0.150		< 0.300		< 10.0		< 10.0		< 10.0		-
589	6/7/2018	3	9,330		NA		NA		NA		NA		NA		NA		NA		NA		-
0010	6/7/0010	1	7,200		< 0.050		< 0.050		< 0.050	[	< 0.150		< 0.300		< 10.0	[	< 10.0	[	< 10.0		-
SP10	6/7/2018	4	3,760		NA		NA		NA		NA		NA		NA		NA		NA		-
North	6/7/2018	surface	192		NA		NA		NA		NA		NA		NA		NA		NA		-
South	6/7/2018	surface	256		NA		NA		NA		NA		NA		NA		NA		NA		-
East	6/7/2018	surface	400		NA		NA		NA		NA		NA		NA		NA		NA		-
West	6/7/2018	surface	256		NA		NA		NA		NA		NA		NA		NA		NA		-
NOTES																					

NOTES:

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ft. Feet bgs Below ground surface

ppm Parts per million

mg/kg Milligrams per kilogram

NA Sample not analyzed

TPH Total Petroleum Hydrocarbons

GRO Gasoline range organics

DRO Diesel range organics

1 Method SM4500Cl-B

2 Method 8021B

3 Method 8015M

QUALIFIERS:

QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted

based on acceptable LCS revovery.

Bold and italicized values indicate exceedance of proposed RRALs and Reclamation Requirements for surface soils outside of oil and gas production areas.

Shaded rows indicate intervals proposed for excavation.

# APPENDIX A C-141 Forms

State of New Mexico Energy Minerals and Natural Resources

Revised April 3, 2017 t 1 Copy to appropriate District Office in

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

### **Release Notification and Corrective Action**

		<b>OPERATOR</b>	🛛 Initial	l Report 🛛 🗌 Final F	Report
Name of Company: COG Operating, LLC (OG	RID #229137)	Contact:	Robert McNeill		
Address: 600 West Illinois Avenue, Midland,	TX 79701	Telephone No.	432-683-7443		
Facility Name: Roy Batty Federal Com #003	Facility Type: Flowl	ine			
Surface Owner: Private	Mineral Owner	r: Federal	API No.	30-025-41333	

### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
0	11	24S	33E					Lea

Latitude 32.2259 Longitude -103.5410 NAD83

### NATURE OF RELEASE

Type of Release	Volume of Release	Volume Recovered				
Produced Water	60 bbl.	50 bbl.				
Source of Release	Date and Hour of Occurrence	Date and Hour of Discovery				
Flowline Leak	April 21, 2018 9:00am	April 21, 2018 9:00am				
Was Immediate Notice Given?	If YES, To Whom?					
🛛 Yes 🗌 No 🗌 Not Required	Olivia Yu – NMOCD Shelley Tuck	er - BLM				
By Whom? Sheldon Hitchcock	Date and Hour April 21, 2018 12:5	1pm				
Was a Watercourse Reached?	If YES, Volume Impacting the Wate	ercourse.				
🗌 Yes 🖾 No						
If a Watercourse was Impacted, Describe Fully.*	<b>RECEIVED</b> By Olivia Yu at 9:3	36 am, Apr 27, 2018				
Describe Cause of Problem and Remedial Action Taken.*						
The release was due to the flange coupler on the Flex FP150 line corrodin	g causing it to leak. Flange coupler is	being replaced.				
Describe Area Affected and Cleanup Action Taken.*						
The release was within a pasture. A vacuum truck was dispatched to remo any possible impact from the release and we will present a remediation we activities.						
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.						
	<u>OIL CONSERV</u>	ATION DIVISION				
Signature: Dann Organic		in -				
	Approved by Environmental Specialis	it:				
Title: HSE Administrative Assistant	Approval Date: 4/27/2018	Expiration Date:				
E-mail Address: agrant@concho.com	Conditions of Approval:	Attached 🔽				
Date: April 25, 2018 Phone: 432-253-4513	see attached directive					

\* Attach Additional Sheets If Necessary

pOY1811735454

Form C-141

### Operator/Responsible Party,

The OCD has received the form C-141 you provided on \_4/25/2018\_ regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number \_1RP-5029\_ has been assigned. Please refer to this case number in all future correspondence.

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

The responsible person shall complete <u>division-approved corrective action</u> for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC. [emphasis added]

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District \_1\_ office in \_\_Hobbs\_\_\_\_ on or before \_5/27/2018\_. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

• Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C<sub>6</sub> thru C<sub>36</sub>), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.

• Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C<sub>6</sub> thru C<sub>36</sub>), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.

• Nominal detection limits for field and laboratory analyses must be provided.

• Composite sampling is not generally allowed.

• Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

•Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.

• If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.

• Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.

Jim Griswold OCD Environmental Bureau Chief 1220 South St. Francis Drive Santa Fe, New Mexico 87505 505-476-3465 jim.griswold@state.nm.us

From:	Sheldon Hitchcock
То:	Yu, Olivia, EMNRD; stucker@blm.gov
Cc:	Robert McNeill; Rebecca Haskell; Dakota Neel; Christopher Gray; DeAnn Grant
Subject:	(Notification) Roy Batty Federal Com #003H
Date:	Saturday, April 21, 2018 12:51:06 PM

Ms. Yu/Ms. Tucker,

COG Operating LLC (OGRID# 239137) is reporting a release from a flowline adjacent to the Roy Batty Federal #003.

Release Location:

ULSTR: O-11-24S-33E

Lat/Long: 32.2254181,-103.5406799

Release Volume: >25bbls

Recovery Volume: Ongoing

COG will have the release evaluated and will submit an Initial C-141. If you have any questions or concerns please do not hesitate to contact me.

Thank you,

Sheldon Hitchcock HSE Coordinator

### Sent from my IPhone

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Oil Conservation Division

	<b>Page 19 of</b> 7
Incident ID	NOY1811735138
District RP	1RP-5029
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>&gt;55</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 <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
- $\checkmark$  Depth to water determination
- Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- Boring or excavation logs
- Photographs including date and GIS information
- Topographic/Aerial maps
- Laboratory data including chain of custody

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

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		Page 20 o
vation Division	Incident ID District RP Facility ID Application ID	NOY1811735138 1RP-5029
ile certain release notifications and perfor C-141 report by the OCD does not reliev nation that pose a threat to groundwater, s elieve the operator of responsibility for co	m corrective actions for re e the operator of liability s surface water, human healt ompliance with any other f	leases which may endanger hould their operations have h or the environment. In
Date: 12/14/22		
Telephone: 432-	685-2573	
Date:	12/16/2022	
	e and complete to the best of my knowled le certain release notifications and perfor C-141 report by the OCD does not relieve nation that pose a threat to groundwater, s elieve the operator of responsibility for co Title: Program M Date: 12/14/22 Telephone: 432-	Vation Division District RP Facility ID

**Received by OCD: 12/16/2022 11:58:00 AM** Form C-141 State of New Mexico

Oil Conservation Division

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

	Page	21	of	77	
81173513	8				

Incident IDNOY1811735138District RP1RP-5029Facility IDApplication ID

## **Remediation Plan**

Detailed description of proposed remediation technique Scaled sitemap with GPS coordinates showing delineation points **Solution** Estimated volume of material to be remediated Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required) Deferral Requests Only: Each of the following items must be confirmed as part of any request for deferral of remediation. Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction. Extents of contamination must be fully delineated. Contamination does not cause an imminent risk to human health, the environment, or groundwater. I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. Title: Program Manager, Remediation Printed Name: Ike Tavarez Signature: Date: 12/14/22 email: ike.tavarez@conocophillips.com Telephone: 432-685-2573 **OCD Only** Jocelyn Harimon Date: 12/16/2022 Received by: Approved Approved with Attached Conditions of Approval Denied Deferral Approved uttan Hall Date: 12/19/2022 Signatúre:

Page 5

# APPENDIX B Regulatory Correspondence & Delineation Workplan (BBC International Incorporated, 2018)



PHONE (575) 397-6388 • FAX (575) 397- 0397 • 1324 W. MARLAND • P.O. BOX 805 • HOBBS, NM 88241-0805 E-MAIL: cbrunson@bbcinternational.com

# **DELINEATION WORKPLAN**

## COG – ROY BATTY FEDERAL COM #003H (Leak Date: 4/21/18)

### RP # 1RP-5029

This delineation workplan and remediation proposal addresses the release associated with RP # 1RP-5029.

The following information includes:

- 1. Appropriate completed and signed C-141 pages.
- 2. Scaled digital site map with spill area demarcated and leak point identified along with sample point locations and areas of remediation at appropriate depths.
- 3. GPS information for sample points and sample methodology.
- 4. Depth to groundwater information (i.e., pdf of OSE search results, USGS search results, and/or copy of Chevron groundwater trend map).
- 5. Watercourse/features map within 1000 feet.
- 6. BLM Cave Karst map.
- 7. FEMA National Flood map.
- 8. Laboratory analysis results summary table and original laboratory analysis reports.
- 9. Potentially other pertinent information as necessary for site specific purposes.

# Based on the information included in this package and the NMOCD rules, the following remediation is proposed:

COG will excavate the spill area as depicted on the following site diagram. The leak areas near SP1- SP5 (ORANGE shade on diagram) will be excavated to a depth of 6 inches. Approximately 48 cubic yards of material will be removed and hauled to proper disposal. Sidewall confirmation samples will be collected at an interval no greater than 50 feet and analyzed at a laboratory. The remediation will be completed within 90 days of regulatory approval.

### SITE RECLAMATION AND RESTORATION

COG will perform the reclamation and revegetation in the pasture area per NMED 19.15.29.13. The reclamation will be achieved by removing the soil to a depth of 4.0' below surface near SP6-SP10. Approximately 640 cubic yards of material will be removed and hauled to proper disposal. Once excavated, soil samples will be collected from the sidewalls to confirm the removal of impact soil greater than 600

### **DELINEATION WORKPLAN**

### COG – ROY BATTY FEDERAL COM #003H (Leak Date: 4/21/18)

### **RP # 1RP-5029**

# mg/kg chlorides or background (whichever is greater) at an interval of no greater than 50 feet spacing. The backfilled material will be non-contaminated with concentrations below 600 mg/kg chlorides and reseeded per BLM guidelines when appropriate.

The entire site will then be backfilled with clean soil and revegetated (if warranted) to the standards of the appropriate regulatory agency or private surface owner.

All excavated materials will be disposed of at an NMOCD-approved disposal facility.

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

Incident ID	
District RP	1RP-5029
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?	420 (ft bgs)
Did this release impact groundwater or surface water?	🗌 Yes 🔳 No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	🗌 Yes 🔳 No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	🗌 Yes 🔳 No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	🗌 Yes 🔳 No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	🔲 Yes 🔳 No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	🗌 Yes 🔳 No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	🗌 Yes 🔳 No
Are the lateral extents of the release within 300 feet of a wetland?	🗌 Yes 🔳 No
Are the lateral extents of the release overlying a subsurface mine?	🗌 Yes 🔳 No
Are the lateral extents of the release overlying an unstable area such as karst geology?	🗌 Yes 🔳 No
Are the lateral extents of the release within a 100-year floodplain?	🗌 Yes 🔳 No
Did the release impact areas not on an exploration, development, production, or storage site?	Yes No

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

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

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

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

Form C-141 State of New Mexico Incident ID **Oil Conservation Division** Page 4 **District RP** 1RP-5029 Facility ID **Application ID** I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. Printed Name: Rebecca Haskell Title: Senior HSE Coordinator Date: 11/10/18 Signature: A Telephone: (432) 683-7443 email: rhaskell@concho.com **OCD Only** Received by: Date:

Received by OCD: 12/16/2022 11:58:00 AM

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

[	Incident ID	
-[	District RP	1RP-5029
	Facility ID	
[	Application ID	

# **Remediation Plan**

Remediation Plan Checklist: Each of the following items must b	e included in the plan.
<ul> <li>Detailed description of proposed remediation technique</li> <li>Scaled sitemap with GPS coordinates showing delineation poin</li> <li>Estimated volume of material to be remediated</li> <li>Closure criteria is to Table 1 specifications subject to 19.15.29.</li> <li>Proposed schedule for remediation (note if remediation plan times)</li> </ul>	12(C)(4) NMAC
Deferral Requests Only: Each of the following items must be con	nfirmed as part of any request for deferral of remediation.
Contamination must be in areas immediately under or around padeconstruction.	roduction equipment where remediation could cause a major facility
Extents of contamination must be fully delineated.	
Contamination does not cause an imminent risk to human healt	n, the environment, or groundwater.
	e and remediate contamination that pose a threat to groundwater, acceptance of a C-141 report does not relieve the operator of
Received by:	Date:
Approved Approved with Attached Conditions of	
Signature:	Date:



COG, Roy Batty Federal Com #003H

Sample points

- SP1, N 32.22568 W-103.54212
- SP2, N 32.22579 W-103.54213
- SP3, N 32.22585 W-103.54208
- SP4, N 32.22584 W-103.54189
- SP5, N 32.22585 W-103.54175
- SP6, N 32.22593 W-103.54167
- SP7, N 32.22597 W-103.54154
- SP8, N 32.22595 W-103.54144
- SP9, N 32.22599 W-103.54136
- SP10, N 32.22596 W-103.54125
- NORTH, N 32.22605 W-103.54138
- SOUTH, N 32.22564 W-103.54211
- EAST, N 32.22595 W-103.54116
- WEST, N 32.22575 W-103.54221



# New Mexico Office of the State Engineer Point of Diversion Summary

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Well Tag PO	D Number	Q64 Q	16 Q4	Sec	Tws	Rng	Х	Y	
NA C	03917 POD1	4	1 3	13	24S	33E	638374	3565212 🌍	1
» Driller License:	1058	Driller C	ompan	y:	KE	Y'S DRII	LLING & P	UMP SERVIC	E
Driller Name:	CASE KEY								
Drill Start Date	: 03/01/2016	Drill Fin	ish Dat	e:	03	3/04/2010	6 Plu	g Date:	
Log File Date:	PCW Rc	v Date:			Sou	Shallow 30 GPM			
Pump Type:	Pipe Disc	harge	Size:		Est				
Casing Size:	6.00	Depth W	ell:	ŝ	600 feet		Dej	Depth Water:	
wa	ter Bearing Stratif	ications:	То	рB	ottom	Descri	ption		
			52	0	600	Sandst	one/Gravel/	Conglomerate	
	Casing Perf	orations:	То	рB	ottom				
			30	0	600				

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.

11/5/18 6:13 PM

POINT OF DIVERSION SUMMARY



# New Mexico Office of the State Engineer Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)	(R=POD replaced O=orpha C=the fil closed)	ined,			1.000				V 2=NE est to la	C 3=SW 4=S	E) JAD83 UTM in n	neters)	(In fe	et)	
	closed)	POD		2	que	ii te	is are	Sman	031 10 14	(1 <u>6</u> 631) (1			(in it		
POD Number	Code	Sub-	County		Q 16	. 5		Tws	Rng	x	Y	DistanceDep	othWellDept		Vater
C 03917 POD1		C	LE	4	1	3	13	24S	33E	638374	3565212 🌍	2169	600	420	180
<u>C 02308</u>		CUB	LE	1	3	1	10	24S	33E	634953	3567364* 🌍	2339	40	20	20
C 03662 POD1		С	LE	3	1	2	23	24S	33E	637342	3564428 🌍	2656	550	110	440
<u>C 04014 POD4</u>		CUB	LE	3	4	2	01	24S	33E	639295	3568859 🌍	2688	96	86	10
C 03666 POD1		С	LE	2	3	4	13	24S	33E	639132	3565078 🌍	2733	650	390	260
C 04014 POD5		CUB	LE	1	4	2	01	24S	33E	639284	3569086 🌍	2835	95	85	10
C 04014 POD3		CUB	LE	2	4	2	01	24S	33E	639497	3569007 🌍	2938	95	87	8
C 04014 POD1		CUB	LE	1	1	3	06	24S	34E	639811	3568638 🌍	2974	91	81	10
C 04014 POD2		CUB	LE	4	4	2	01	24S	33E	639656	3568917 🌍	3003	95	81	14
C 03601 POD1		CUB	LE	4	4	2	23	24S	33E	638124	3563937 🌍	3259			
											Avera	ge Depth to Wat	er:	151 fee	et
												Minimum De	pth:	20 fee	t
												Maximum Dep	oth:	420 fee	et .
Record Count: 10															
UTMNAD83 Radius	Search (in	meters):													
Easting (X): 637	276		North	ing	(Y	):	3567	084			Radius: 3400				
*UTM location was derived	from PLSS -	see Help													
The data is furnished by the N accuracy, completeness, reliabi	MOSE/ISC a	and is acco	epted by the	rec	ipier	nt w	rith th	e expre	ssed und	lerstanding th	at the OSE/ISC ma	ke no warranties,	expressed or im	plied, concert	ning the
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11/5/18 6:11 PM

WATER COLUMN/ AVERAGE DEPTH TO WATER



USGS Home Contact USGS Search USGS

### **National Water Information System: Web Interface**

**USGS Water Resources** 

Data Category: Groundwater Geographic Area: New Mexico

GO

Click to hideNews Bulletins

- Please see news on new formats
- UPDATE, 11/2: The USGS continues to make progress on restoring all of its gages. As of 3 p.m. Friday, November 2, less than 3 percent of USGS streamgages are still not transmitting due to an issue with the telemetry system that records and transmits streamgage data. The USGS will continue to work through the weekend to bring the streamgages back online. Read more
- Full News 🔊

Groundwater levels for New Mexico

Click to hide state-specific text

### Site Selection Results -- 3591 sites found

County = Lea Minimum number of levels = 1

Save file of selected sites to local disk for future upload

# Data for individual sites can be obtained by selecting the site number below

Agency			Period of Record				
	Site Number	Site Name	Begin Date	End Date	Levels		
		24s.33e.11					

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 | U.S. Geological Survey

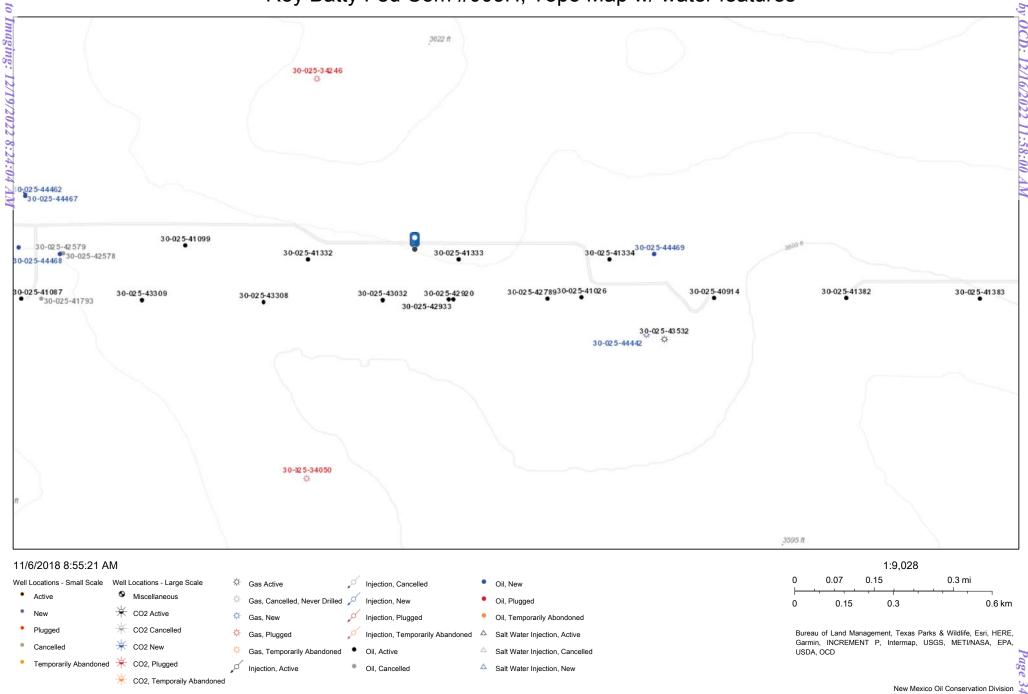


Title: Groundwater levels -- 3591 sites found URL: https://nwis.waterdata.usgs.gov/nm/nwis/gwlevels?

Page Contact Information: <u>New Mexico Water Data Maintainer</u> Page Last Modified: 2018-11-05 20:57:07 EST 7.66 1.17 nadww01

# Roy Batty Fed Com #003H, Topo Map w/ water features

Released



NM OCD Oil and Gas Map. http://nm-emnrd.maps.arcgis.com/apps/webappviewer/: New Mexico Oil Conservation Division 0

3



# National Flood Hazard Layer FIRMette



### Legend

#### 🕸°13'47.74"N SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOU Without Base Flood Elevation (BFE) 9 With BFE or Depth Zone AE, AO, AH, VE, A SPECIAL FLOOD HAZARD AREAS **Regulatory Floodway** 0.2% Annual Chance Flood Hazard, Ands of 1% annual chance flood with avera depth less than one foot or with drain areas of less than one square mile zor Future Conditions 1% Annual Chance Flood Hazard Zone X Area with Reduced Flood Risk due to Levee. See Notes. Zone X OTHER AREAS OF FLOOD HAZARD Area with Flood Risk due to Levee Zon NO SCREEN Area of Minimal Flood Hazard Zone X Effective LOMRs T24S R33E S11 OTHER AREAS Area of Undetermined Flood Hazard Zone D GENERAL - — – – Channel, Culvert, or Storm Sewer STRUCTURES IIIIII Levee, Dike, or Floodwall 20.2 Cross Sections with 1% Annual Chance 17.5 Water Surface Elevation **Coastal Transect** LEA COUNTY Zone D Base Flood Elevation Line (BFE) ~ 513 ~~~~ 350130 Limit of Study Jurisdiction Boundary **Coastal Transect Baseline** OTHER **Profile Baseline** 35025C1900D FEATURES Hydrographic Feature 12/16/2008 **Not**Printed **Digital Data Available** No Digital Data Available MAP PANELS $\square$ Unmapped The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location. This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap T24S R33E S14 accuracy standards The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 11/6/2018 at 11:44:42 AM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time. This map image is void if the one or more of the following map a length elements do not appear: basemap imagery, flood zone labels, 12 USGS The National Map: Orthoimagery. Data refreshed October 2017. legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for 32°13'17.30"N 1:6,000 Feet unmapped and unmodernized areas cannot be used for regulatory purposes. 250 500 1,000 1,500 2,000

S 0

#### Laboratory Analytical Results Summary Roy Batty Federal Com #003H

	r			
		Sample ID	SP1 @ 1'	SP1 @ 6'
Analyte	Method	Date	6/6/18	6/6/18
			mg/kg	mg/kg
Benzene	BTEX 8021B		<0.050	n/a
Toluene	BTEX 8021B		<0.050	n/a
Ethylbenzene	BTEX 8021B		<0.050	n/a
Total Xylenes	BTEX 8021B		<0.150	n/a
Total BTEX	BTEX 8021B		<0.300	n/a
Chloride	SM4500CI-B		48	80
GRO	TPH 8015M		<10.0	n/a
DRO	TPH 8015M		<10.0	n/a
EXT DRO	TPH 8015M		<10.0	n/a

		Sample ID	SP2 @ 1'	SP2 @ 6'
Analyte	Method	Date	6/6/18	6/6/18
			mg/kg	mg/kg
Benzene	BTEX 8021B		<0.050	n/a
Toluene	BTEX 8021B		<0.050	n/a
Ethylbenzene	BTEX 8021B		<0.050	n/a
Total Xylenes	BTEX 8021B		<0.150	n/a
Total BTEX	BTEX 8021B		<0.300	n/a
Chloride	SM4500CI-B		160	112
GRO	TPH 8015M		<10.0	n/a
DRO	TPH 8015M		<10.0	n/a
EXT DRO	TPH 8015M		<10.0	n/a

		Sample ID	SP3 @ 1'	SP3 @ 6'
Analyte	Method	Date	6/6/18	6/6/18
			mg/kg	mg/kg
Benzene	BTEX 8021B		<0.050	n/a
Toluene	BTEX 8021B		<0.050	n/a
Ethylbenzene	BTEX 8021B		<0.050	n/a
Total Xylenes	BTEX 8021B		<0.150	n/a
Total BTEX	BTEX 8021B		<0.300	n/a
Chloride	SM4500CI-B		32	32
GRO	TPH 8015M		<10.0	n/a
DRO	TPH 8015M		<10.0	n/a
EXT DRO	TPH 8015M		<10.0	n/a

		Sample ID	SP4 @ 1'	SP4 @ 6'
Analyte	Method	Date	6/6/18	6/6/18
			mg/kg	mg/kg
Benzene	BTEX 8021B		<0.050	n/a
Toluene	BTEX 8021B		<0.050	n/a
Ethylbenzene	BTEX 8021B		<0.050	n/a
Total Xylenes	BTEX 8021B		<0.150	n/a
Total BTEX	BTEX 8021B		<0.300	n/a
Chloride	SM4500CI-B		176	224
GRO	TPH 8015M		<10.0	n/a
DRO	TPH 8015M		<10.0	n/a
EXT DRO	TPH 8015M		<10.0	n/a

		Sample ID	SP5 @ 1'	SP5 @ 2'	SP5 @ 7'
Analyte	Method	Date	6/6/18	6/6/18	6/6/18
			mg/kg	mg/kg	mg/kg
Benzene	BTEX 8021B		<0.050	n/a	n/a
Toluene	BTEX 8021B		<0.050	n/a	n/a
Ethylbenzene	BTEX 8021B		<0.050	n/a	n/a
Total Xylenes	BTEX 8021B		<0.150	n/a	n/a
Total BTEX	BTEX 8021B		<0.300	n/a	n/a
Chloride	SM4500CI-B		624	176	256
GRO	TPH 8015M		<10.0	n/a	n/a
DRO	TPH 8015M		<10.0	n/a	n/a
EXT DRO	TPH 8015M		<10.0	n/a	n/a

		Sample ID	SP6 @ 1'	SP6 @ 4'	SP6 @ 6'	SP6 @ 8'	SP6 @ 9'
Analyte	Method	Date	6/6/18	6/6/18	6/6/18	6/6/18	6/6/18
			mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Benzene	BTEX 8021B		<0.050	n/a	n/a	n/a	n/a
Toluene	BTEX 8021B		<0.050	n/a	n/a	n/a	n/a
Ethylbenzene	BTEX 8021B		<0.050	n/a	n/a	n/a	n/a
Total Xylenes	BTEX 8021B		<0.150	n/a	n/a	n/a	n/a
Total BTEX	BTEX 8021B		<0.300	n/a	n/a	n/a	n/a
Chloride	SM4500CI-B		5600	20400	6660	1660	176
GRO	TPH 8015M		<10.0	n/a	n/a	n/a	n/a
DRO	TPH 8015M		<10.0	n/a	n/a	n/a	n/a
EXT DRO	TPH 8015M		<10.0	n/a	n/a	n/a	n/a

		Sample ID	SP7 @ 1'	SP7 @ 4'
Analyte	Method	Date	6/6/18	6/7/18
			mg/kg	mg/kg
Benzene	BTEX 8021B		<0.050	n/a
Toluene	BTEX 8021B		<0.050	n/a
Ethylbenzene	BTEX 8021B		<0.050	n/a
Total Xylenes	BTEX 8021B		<0.150	n/a
Total BTEX	BTEX 8021B		<0.300	n/a
Chloride	SM4500CI-B		4320	2400
GRO	TPH 8015M		<10.0	n/a
DRO	TPH 8015M		<10.0	n/a
EXT DRO	TPH 8015M		<10.0	n/a

		Sample ID	SP8 @ 1'	SP8 @ 4'
Analyte	Method	Date	6/7/18	6/7/18
			mg/kg	mg/kg
Benzene	BTEX 8021B		<0.050	n/a
Toluene	BTEX 8021B		<0.050	n/a
Ethylbenzene	BTEX 8021B		<0.050	n/a
Total Xylenes	BTEX 8021B		<0.150	n/a
Total BTEX	BTEX 8021B		<0.300	n/a
Chloride	SM4500CI-B		5680	1720
GRO	TPH 8015M		<10.0	n/a
DRO	TPH 8015M		<10.0	n/a
EXT DRO	TPH 8015M		<10.0	n/a

		Sample ID	SP9 @ 1'	SP9 @ 3'
Analyte	Method	Date	6/7/18	6/7/18
			mg/kg	mg/kg
Benzene	BTEX 8021B		<0.050	n/a
Toluene	BTEX 8021B		<0.050	n/a
Ethylbenzene	BTEX 8021B		<0.050	n/a
Total Xylenes	BTEX 8021B		<0.150	n/a
Total BTEX	BTEX 8021B		<0.300	n/a
Chloride	SM4500CI-B		7200	9330
GRO	TPH 8015M		<10.0	n/a
DRO	TPH 8015M		<10.0	n/a
EXT DRO	TPH 8015M		<10.0	n/a

		Sample ID	SP10 @ 1'	SP10 @ 4'
Analyte	Method	Date	6/7/18	6/7/18
			mg/kg	mg/kg
Benzene	BTEX 8021B		<0.050	n/a
Toluene	BTEX 8021B		<0.050	n/a
Ethylbenzene	BTEX 8021B		<0.050	n/a
Total Xylenes	BTEX 8021B		<0.150	n/a
Total BTEX	BTEX 8021B		<0.300	n/a
Chloride	SM4500CI-B		7200	3760
GRO	TPH 8015M		<10.0	n/a
DRO	TPH 8015M		<10.0	n/a
EXT DRO	TPH 8015M		<10.0	n/a

Cardinal		Sample ID	NORTH @ SURFACE	
Analyte	Method	Date	6/7/18	6/7/18
			mg/kg	mg/kg
Chloride	SM4500CI-B		192	256

Cardinal		Sample ID	EAST @ SURFACE	WEST @ SURFACE
Analyte	Method	Date	6/7/18	6/7/18
			mg/kg	mg/kg
Chloride	SM4500CI-B		400	256



June 15, 2018

Cliff Brunson BBC International, Inc. P.O. Box 805 Hobbs, NM 88241

RE: ROY BATTERY FED COM #003H

Enclosed are the results of analyses for samples received by the laboratory on 06/13/18 12:35.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-17-10. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at <a href="https://www.tceq.texas.gov/field/qa/lab\_accred\_certif.html">www.tceq.texas.gov/field/qa/lab\_accred\_certif.html</a>.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keine

Celey D. Keene Lab Director/Quality Manager



BBC International, Inc. Cliff Brunson P.O. Box 805 Hobbs NM, 88241 Fax To: (575) 397-0397

Received:	06/13/2018	Sampling Date:	06/06/2018
Reported:	06/15/2018	Sampling Type:	Soil
Project Name:	ROY BATTERY FED COM #003H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

#### Sample ID: SP 1 @ 1' (H801603-01)

BTEX 8021B	mg	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/13/2018	ND	1.74	87.1	2.00	2.24	
Toluene*	<0.050	0.050	06/13/2018	ND	1.75	87.4	2.00	1.87	
Ethylbenzene*	<0.050	0.050	06/13/2018	ND	1.77	88.3	2.00	0.988	
Total Xylenes*	<0.150	0.150	06/13/2018	ND	5.50	91.7	6.00	0.886	
Total BTEX	<0.300	0.300	06/13/2018	ND					
Surrogate: 4-Bromofluorobenzene (PID	110	% 69.8-14	2						
Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	06/14/2018	ND	448	112	400	0.00	
TPH 8015M	mg	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/13/2018	ND	187	93.4	200	6.90	
DRO >C10-C28*	<10.0	10.0	06/13/2018	ND	186	92.9	200	7.89	
EXT DRO >C28-C36	<10.0	10.0	06/13/2018	ND					
Surrogate: 1-Chlorooctane	82.7	% 41-142	2						
Surrogate: 1-Chlorooctadecane	87.1	% 37.6-14	7						

#### Cardinal Laboratories

#### \*=Accredited Analyte

Celeg D. Keene

Celey D. Keene, Lab Director/Quality Manager



BBC International, Inc. Cliff Brunson P.O. Box 805 Hobbs NM, 88241 Fax To: (575) 397-0397

Received:	06/13/2018	Sampling Date:	06/06/2018
Reported:	06/15/2018	Sampling Type:	Soil
Project Name:	ROY BATTERY FED COM #003H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

#### Sample ID: SP 1 @ 6' (H801603-02)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	06/14/2018	ND	448	112	400	0.00	

#### **Cardinal Laboratories**

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Celey D. Keene, Lab Director/Quality Manager



BBC International, Inc. Cliff Brunson P.O. Box 805 Hobbs NM, 88241 Fax To: (575) 397-0397

Received:	06/13/2018	Sampling Date:	06/06/2018
Reported:	06/15/2018	Sampling Type:	Soil
Project Name:	ROY BATTERY FED COM #003H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

#### Sample ID: SP 2 @ 1' (H801603-03)

BTEX 8021B	mg/	'kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/13/2018	ND	1.74	87.1	2.00	2.24	
Toluene*	<0.050	0.050	06/13/2018	ND	1.75	87.4	2.00	1.87	
Ethylbenzene*	<0.050	0.050	06/13/2018	ND	1.77	88.3	2.00	0.988	
Total Xylenes*	<0.150	0.150	06/13/2018	ND	5.50	91.7	6.00	0.886	
Total BTEX	<0.300	0.300	06/13/2018	ND					
Surrogate: 4-Bromofluorobenzene (PID	109 9	69.8-14	2						
Chloride, SM4500Cl-B	mg/	'kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	160	16.0	06/14/2018	ND	448	112	400	0.00	
TPH 8015M	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/13/2018	ND	187	93.4	200	6.90	
DRO >C10-C28*	<10.0	10.0	06/13/2018	ND	186	92.9	200	7.89	
EXT DRO >C28-C36	<10.0	10.0	06/13/2018	ND					
Surrogate: 1-Chlorooctane	83.2	% 41-142	2						
Surrogate: 1-Chlorooctadecane	86.4	% 37.6-14	7						

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Celey D. Keene, Lab Director/Quality Manager



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Received:	06/13/2018	Sampling Date:	06/06/2018
Reported:	06/15/2018	Sampling Type:	Soil
Project Name:	ROY BATTERY FED COM #003H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

#### Sample ID: SP 2 @ 6' (H801603-04)

Chloride, SM4500CI-B	mg	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	112	16.0	06/14/2018	ND	448	112	400	0.00	

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Received:	06/13/2018	Sampling Date:	06/06/2018
Reported:	06/15/2018	Sampling Type:	Soil
Project Name:	ROY BATTERY FED COM #003H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

#### Sample ID: SP 3 @ 1' (H801603-05)

BTEX 8021B	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/13/2018	ND	1.74	87.1	2.00	2.24	
Toluene*	<0.050	0.050	06/13/2018	ND	1.75	87.4	2.00	1.87	
Ethylbenzene*	<0.050	0.050	06/13/2018	ND	1.77	88.3	2.00	0.988	
Total Xylenes*	<0.150	0.150	06/13/2018	ND	5.50	91.7	6.00	0.886	
Total BTEX	<0.300	0.300	06/13/2018	ND					
Surrogate: 4-Bromofluorobenzene (PID	114 %	69.8-14	2						
Chloride, SM4500Cl-B	mg/	kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	06/14/2018	ND	448	112	400	0.00	
TPH 8015M	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/13/2018	ND	187	93.4	200	6.90	
DRO >C10-C28*	<10.0	10.0	06/13/2018	ND	186	92.9	200	7.89	
EXT DRO >C28-C36	<10.0	10.0	06/13/2018	ND					
Surrogate: 1-Chlorooctane	75.0 9	% 41-142	,						
Surrogate: 1-Chlorooctadecane	77.4 9	% 37.6-14	7						

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Celey D. Keene, Lab Director/Quality Manager



BBC International, Inc. Cliff Brunson P.O. Box 805 Hobbs NM, 88241 Fax To: (575) 397-0397

Received:	06/13/2018	Sampling Date:	06/06/2018
Reported:	06/15/2018	Sampling Type:	Soil
Project Name:	ROY BATTERY FED COM #003H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

#### Sample ID: SP 3 @ 6' (H801603-06)

Chloride, SM4500Cl-B mg/kg			Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	06/14/2018	ND	448	112	400	0.00	

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Celey D. Keene, Lab Director/Quality Manager



BBC International, Inc. Cliff Brunson P.O. Box 805 Hobbs NM, 88241 Fax To: (575) 397-0397

Received:	06/13/2018	Sampling Date:	06/06/2018
Reported:	06/15/2018	Sampling Type:	Soil
Project Name:	ROY BATTERY FED COM #003H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

#### Sample ID: SP 4 @ 1' (H801603-07)

BTEX 8021B	mg/	′kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/13/2018	ND	1.74	87.1	2.00	2.24	
Toluene*	<0.050	0.050	06/13/2018	ND	1.75	87.4	2.00	1.87	
Ethylbenzene*	<0.050	0.050	06/13/2018	ND	1.77	88.3	2.00	0.988	
Total Xylenes*	<0.150	0.150	06/13/2018	ND	5.50	91.7	6.00	0.886	
Total BTEX	<0.300	0.300	06/13/2018	ND					
Surrogate: 4-Bromofluorobenzene (PID	110 9	% 69.8-14	2						
Chloride, SM4500Cl-B	mg/	′kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	176	16.0	06/14/2018	ND	448	112	400	0.00	
TPH 8015M	mg/	′kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/13/2018	ND	187	93.4	200	6.90	
DRO >C10-C28*	<10.0	10.0	06/13/2018	ND	186	92.9	200	7.89	
EXT DRO >C28-C36	<10.0	10.0	06/13/2018	ND					
Surrogate: 1-Chlorooctane	80.0	% 41-142	,						
Surrogate: 1-Chlorooctadecane	82.6	% 37.6-14	7						

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BBC International, Inc. Cliff Brunson P.O. Box 805 Hobbs NM, 88241 Fax To: (575) 397-0397

Received:	06/13/2018	Sampling Date:	06/06/2018
Reported:	06/15/2018	Sampling Type:	Soil
Project Name:	ROY BATTERY FED COM #003H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

#### Sample ID: SP 4 @ 6' (H801603-08)

Chloride, SM4500Cl-B mg/kg			Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	224	16.0	06/14/2018	ND	448	112	400	0.00	

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Received:	06/13/2018	Sampling Date:	06/06/2018
Reported:	06/15/2018	Sampling Type:	Soil
Project Name:	ROY BATTERY FED COM #003H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

#### Sample ID: SP 5 @ 1' (H801603-09)

BTEX 8021B	mg/	′kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/13/2018	ND	1.74	87.1	2.00	2.24	
Toluene*	<0.050	0.050	06/13/2018	ND	1.75	87.4	2.00	1.87	
Ethylbenzene*	<0.050	0.050	06/13/2018	ND	1.77	88.3	2.00	0.988	
Total Xylenes*	<0.150	0.150	06/13/2018	ND	5.50	91.7	6.00	0.886	
Total BTEX	<0.300	0.300	06/13/2018	ND					
Surrogate: 4-Bromofluorobenzene (PID	113 9	69.8-14	2						
Chloride, SM4500Cl-B	mg/	′kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	624	16.0	06/14/2018	ND	448	112	400	0.00	
TPH 8015M	mg/	′kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/13/2018	ND	187	93.4	200	6.90	
DRO >C10-C28*	<10.0	10.0	06/13/2018	ND	186	92.9	200	7.89	
EXT DRO >C28-C36	<10.0	10.0	06/13/2018	ND					
Surrogate: 1-Chlorooctane	80.8	% 41-142							
Surrogate: 1-Chlorooctadecane	82.7	% 37.6-14	7						

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Celey D. Keene, Lab Director/Quality Manager



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Received:	06/13/2018	Sampling Date:	06/06/2018
Reported:	06/15/2018	Sampling Type:	Soil
Project Name:	ROY BATTERY FED COM #003H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

#### Sample ID: SP 5 @ 2' (H801603-10)

Chloride, SM4500Cl-B mg/kg		Analyzed By: AC							
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	176	16.0	06/14/2018	ND	448	112	400	0.00	

#### Sample ID: SP 5 @ 7' (H801603-11)

Chloride, SM4500Cl-B mg/kg			Analyze	Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	256	16.0	06/14/2018	ND	448	112	400	0.00	

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Celey D. Keene, Lab Director/Quality Manager



BBC International, Inc. Cliff Brunson P.O. Box 805 Hobbs NM, 88241 Fax To: (575) 397-0397

Received:	06/13/2018	Sampling Date:	06/06/2018
Reported:	06/15/2018	Sampling Type:	Soil
Project Name:	ROY BATTERY FED COM #003H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

#### Sample ID: SP 6 @ 1' (H801603-12)

BTEX 8021B	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/13/2018	ND	1.74	87.1	2.00	2.24	
Toluene*	<0.050	0.050	06/13/2018	ND	1.75	87.4	2.00	1.87	
Ethylbenzene*	<0.050	0.050	06/13/2018	ND	1.77	88.3	2.00	0.988	
Total Xylenes*	<0.150	0.150	06/13/2018	ND	5.50	91.7	6.00	0.886	
Total BTEX	<0.300	0.300	06/13/2018	ND					
Surrogate: 4-Bromofluorobenzene (PID	112 9	% 69.8-14	2						
Chloride, SM4500Cl-B	mg/	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	5600	16.0	06/14/2018	ND	432	108	400	3.64	QM-07
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/13/2018	ND	187	93.4	200	6.90	
DRO >C10-C28*	<10.0	10.0	06/13/2018	ND	186	92.9	200	7.89	
EXT DRO >C28-C36	<10.0	10.0	06/13/2018	ND					
Surrogate: 1-Chlorooctane	79.9	% 41-142	,						
Surrogate: 1-Chlorooctadecane	83.4	% 37.6-14	7						

#### Cardinal Laboratories

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Celeg D. Keene

Celey D. Keene, Lab Director/Quality Manager



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Received:	06/13/2018	Sampling Date:	06/06/2018
Reported:	06/15/2018	Sampling Type:	Soil
Project Name:	ROY BATTERY FED COM #003H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

#### Sample ID: SP 6 @ 4' (H801603-13)

Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	20400	16.0	06/14/2018	ND	432	108	400	3.64	

#### Sample ID: SP 6 @ 6' (H801603-14)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	6660	16.0	06/14/2018	ND	432	108	400	3.64	

#### Sample ID: SP 6 @ 8' (H801603-15)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1660	16.0	06/14/2018	ND	432	108	400	3.64	

#### Sample ID: SP 6 @ 9' (H801603-16)

Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	176	16.0	06/14/2018	ND	432	108	400	3.64	

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\*=Accredited Analyte

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



BBC International, Inc. Cliff Brunson P.O. Box 805 Hobbs NM, 88241 Fax To: (575) 397-0397

Received:	06/13/2018	Sampling Date:	06/06/2018
Reported:	06/15/2018	Sampling Type:	Soil
Project Name:	ROY BATTERY FED COM #003H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

#### Sample ID: SP 7 @ 1' (H801603-17)

BTEX 8021B	mg/	′kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/13/2018	ND	1.74	87.1	2.00	2.24	
Toluene*	<0.050	0.050	06/13/2018	ND	1.75	87.4	2.00	1.87	
Ethylbenzene*	<0.050	0.050	06/13/2018	ND	1.77	88.3	2.00	0.988	
Total Xylenes*	<0.150	0.150	06/13/2018	ND	5.50	91.7	6.00	0.886	
Total BTEX	<0.300	0.300	06/13/2018	ND					
Surrogate: 4-Bromofluorobenzene (PID	110 9	% 69.8-14	2						
Chloride, SM4500Cl-B	mg/	′kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	4320	16.0	06/14/2018	ND	432	108	400	3.64	
TPH 8015M	mg/	′kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/13/2018	ND	187	93.4	200	6.90	
DRO >C10-C28*	<10.0	10.0	06/13/2018	ND	186	92.9	200	7.89	
EXT DRO >C28-C36	<10.0	10.0	06/13/2018	ND					
Surrogate: 1-Chlorooctane	82.8	% 41-142							
Surrogate: 1-Chlorooctadecane	85.4	% 37.6-14	7						

#### Cardinal Laboratories

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Celey D. Keene, Lab Director/Quality Manager



BBC International, Inc. Cliff Brunson P.O. Box 805 Hobbs NM, 88241 Fax To: (575) 397-0397

Received:	06/13/2018	Sampling Date:	06/07/2018
Reported:	06/15/2018	Sampling Type:	Soil
Project Name:	ROY BATTERY FED COM #003H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

#### Sample ID: SP 7 @ 4' (H801603-18)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	2400	16.0	06/14/2018	ND	432	108	400	3.64	

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BBC International, Inc. Cliff Brunson P.O. Box 805 Hobbs NM, 88241 Fax To: (575) 397-0397

Received:	06/13/2018	Sampling Date:	06/07/2018
Reported:	06/15/2018	Sampling Type:	Soil
Project Name:	ROY BATTERY FED COM #003H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

#### Sample ID: SP 8 @ 1' (H801603-19)

BTEX 8021B	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/13/2018	ND	1.74	87.1	2.00	2.24	
Toluene*	<0.050	0.050	06/13/2018	ND	1.75	87.4	2.00	1.87	
Ethylbenzene*	<0.050	0.050	06/13/2018	ND	1.77	88.3	2.00	0.988	
Total Xylenes*	<0.150	0.150	06/13/2018	ND	5.50	91.7	6.00	0.886	
Total BTEX	<0.300	0.300	06/13/2018	ND					
Surrogate: 4-Bromofluorobenzene (PID	110 %	69.8-14	2						
Chloride, SM4500Cl-B	mg/	kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	5680	16.0	06/14/2018	ND	432	108	400	3.64	
TPH 8015M	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/13/2018	ND	187	93.4	200	6.90	
DRO >C10-C28*	<10.0	10.0	06/13/2018	ND	186	92.9	200	7.89	
EXT DRO >C28-C36	<10.0	10.0	06/13/2018	ND					
Surrogate: 1-Chlorooctane	83.1	% 41-142	2						
Surrogate: 1-Chlorooctadecane	84.7	% 37.6-14	7						

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Celey D. Keene, Lab Director/Quality Manager



BBC International, Inc. Cliff Brunson P.O. Box 805 Hobbs NM, 88241 Fax To: (575) 397-0397

Received:	06/13/2018	Sampling Date:	06/07/2018
Reported:	06/15/2018	Sampling Type:	Soil
Project Name:	ROY BATTERY FED COM #003H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

#### Sample ID: SP 8 @ 4' (H801603-20)

Chloride, SM4500Cl-B	mg	/kg	Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1720	16.0	06/14/2018	ND	432	108	400	3.64	

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BBC International, Inc. Cliff Brunson P.O. Box 805 Hobbs NM, 88241 Fax To: (575) 397-0397

Received:	06/13/2018	Sampling Date:	06/07/2018
Reported:	06/15/2018	Sampling Type:	Soil
Project Name:	ROY BATTERY FED COM #003H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

#### Sample ID: SP 9 @ 1' (H801603-21)

BTEX 8021B	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/13/2018	ND	1.74	87.1	2.00	2.24	
Toluene*	<0.050	0.050	06/13/2018	ND	1.75	87.4	2.00	1.87	
Ethylbenzene*	<0.050	0.050	06/13/2018	ND	1.77	88.3	2.00	0.988	
Total Xylenes*	<0.150	0.150	06/13/2018	ND	5.50	91.7	6.00	0.886	
Total BTEX	<0.300	0.300	06/13/2018	ND					
Surrogate: 4-Bromofluorobenzene (PID	109 9	% 69.8-14	2						
Chloride, SM4500Cl-B	mg/	/kg	Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	7200	16.0	06/14/2018	ND	432	108	400	3.64	
TPH 8015M	mg/	/kg	Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/13/2018	ND	187	93.4	200	6.90	
DRO >C10-C28*	<10.0	10.0	06/13/2018	ND	186	92.9	200	7.89	
EXT DRO >C28-C36	<10.0	10.0	06/13/2018	ND					
Surrogate: 1-Chlorooctane	82.4	% 41-142							
Surrogate: 1-Chlorooctadecane	83.2	% 37.6-14	7						

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Celey D. Keene, Lab Director/Quality Manager



BBC International, Inc. Cliff Brunson P.O. Box 805 Hobbs NM, 88241 Fax To: (575) 397-0397

Received:	06/13/2018	Sampling Date:	06/07/2018
Reported:	06/15/2018	Sampling Type:	Soil
Project Name:	ROY BATTERY FED COM #003H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

#### Sample ID: SP 9 @ 3' (H801603-22)

Chloride, SM4500Cl-B	mg	/kg	Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	9330	16.0	06/14/2018	ND	432	108	400	3.64	

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BBC International, Inc. Cliff Brunson P.O. Box 805 Hobbs NM, 88241 Fax To: (575) 397-0397

Received:	06/13/2018	Sampling Date:	06/07/2018
Reported:	06/15/2018	Sampling Type:	Soil
Project Name:	ROY BATTERY FED COM #003H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

#### Sample ID: SP 10 @ 1' (H801603-23)

BTEX 8021B	mg/	′kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	06/13/2018	ND	1.74	87.1	2.00	2.24	
Toluene*	<0.050	0.050	06/13/2018	ND	1.75	87.4	2.00	1.87	
Ethylbenzene*	<0.050	0.050	06/13/2018	ND	1.77	88.3	2.00	0.988	
Total Xylenes*	<0.150	0.150	06/13/2018	ND	5.50	91.7	6.00	0.886	
Total BTEX	<0.300	0.300	06/13/2018	ND					
Surrogate: 4-Bromofluorobenzene (PID	112 9	69.8-14	2						
Chloride, SM4500Cl-B	mg/	′kg	Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	7200	16.0	06/14/2018	ND	432	108	400	3.64	
TPH 8015M	mg/	′kg	Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	06/13/2018	ND	187	93.4	200	6.90	
DRO >C10-C28*	<10.0	10.0	06/13/2018	ND	186	92.9	200	7.89	
EXT DRO >C28-C36	<10.0	10.0	06/13/2018	ND					
Surrogate: 1-Chlorooctane	82.6	% 41-142	,						
Surrogate: 1-Chlorooctadecane	85.7	% 37.6-14	7						

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



BBC International, Inc. Cliff Brunson P.O. Box 805 Hobbs NM, 88241 Fax To: (575) 397-0397

Received:	06/13/2018	Sampling Date:	06/07/2018
Reported:	06/15/2018	Sampling Type:	Soil
Project Name:	ROY BATTERY FED COM #003H	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA COUNTY, NM		

#### Sample ID: SP 10 @ 4' (H801603-24)

Chloride, SM4500Cl-B	mg/kg			Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	3760	16.0	06/14/2018	ND	432	108	400	3.64	

### Sample ID: NORTH @ SURFACE (H801603-25)

Chloride, SM4500CI-B	mg	/kg	Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	192	16.0	06/14/2018	ND	432	108	400	3.64	

#### Sample ID: SOUTH @ SURFACE (H801603-26)

Chloride, SM4500Cl-B	e, SM4500Cl-B mg/kg			Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	256	16.0	06/14/2018	ND	432	108	400	3.64	

#### Sample ID: EAST @ SURFACE (H801603-27)

Chloride, SM4500Cl-B	mg	/kg	Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	400	16.0	06/14/2018	ND	432	108	400	3.64	

#### Sample ID: WEST @ SURFACE (H801603-28)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	256	16.0	06/14/2018	ND	432	108	400	3.64	

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Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



#### **Notes and Definitions**

QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C
	Samples reported on an as received basis (wet) unless otherwise noted on report

#### **Cardinal Laboratories**

#### \*=Accredited Analyte

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager

# CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

ARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240 (505) 393-2326 FAX (505) 393-2476

	e: BBC International, Inc.									1	<b>B/</b>	LL TO		10 11				ANA	LYS	IS R	EQUE	ST	-	-	
Project Manage	er: Cliff Brunson							Р.(	0. #	:	ŧ.,			Г		1		T	T	T	T	T	T	T	
Address: P.C	. Box 805							Co	mpa	any:		COG		1											
City: Hobbs	State: NM	Zip	o: (	882	241			Att	tn:	P		Ky Has	stall	1		1									
Phone #: 575-	-397-6388 Fax #: 575	-39	7-0	39	7				dre			7.00		1			1								
Project #:	Project Owner	r:	10	G	5			Cit	y:					1			1	1							
Project Name:	ROY BATTY FED COM #003H (4)	21/	18)					Sta	ate:			Zip:		1											
Project Locatio	n: LEA COUNTY, NM								one	#:															
	JEFF ORNELAS							-	x #:					1				1							1 1
FOR LAB USE ONLY			Г		N	ATR	x	_	-	SEF	RV.	SAMPL	ING	1					1			1		1	1 1
Lab I.D. H801603	Sample I.D.	(G)RAB OR (C)OMP	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	SLUDGE	OTHER :	ACID/BASE:	ICE / COOL	OTHER :	DATE	TIME	51	BTEX	TPH EX-									
1	SP1 @ 1'	G	1							~		6/6/18	8:41 AM	1	1	1					1				
	SP1 @ 6'	G	1			1				~		6/6/18	8:59 AM	1											
3	SP2 @ 1'	G	1			1				~		6/6/18	9:20 AM	1	1	1									
4	SP2 @ 6'	G	1							~		6/6/18	9:51 AM	1	1.1										
5	SP3 @ 1'	6	1			/				~		6/6/18	10:20 AM	1	1	1		12							
6	SP3 @ 6'	G	1		1	1				V		6/6/18	10:50 AM	1											
7	SP4 @ 1'	G	1			1				1		6/6/18	11:11 AM	1	1	1									
	SP4 @ 6'	6	1			/				~		6/6/18	11:39 AM	1											
9	SP5 @ 1'	G	1			1				/		6/6/18	11:55 AM	1	1	1									
10	SP5 @ 2'	G	1			1				/		6/6/18	12:08 PM	1											

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analyses. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable

service. In no event shall Cardinal be liable for incidental or consequental damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries,

Relinguished By:	Date:	Received By:	Phone Result:	C Vec	Add'I Phone #:
less a har	6718	X	Fax Result:	□ Yes	Add'I Fax #:
VEHONNES	Time: SDam	av-	REMARKS:		*****
Relinquished By:	Date: 0 110	Received By:			
Yat	12:35	adi Menson			
	20/ 70	Sample Condition CHECKED BY:	1		
Sampler - UPS - Bus - Other:	00/-1.1	Cool Intact No No No			

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

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ARDINAL LABORATORIES

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page 24 of 25

101 East Marland, Hobbs, NM 88240 (505) 393-2326 FAX (505) 393-2476

Company Name	BBC International, Inc.									1	BII	LL TO						ANA	LYSI	S RE	QUE	ST	 	
	r: Cliff Brunson							P.(	D. #.	:														
Address: P.O	. Box 805							Co	mpa	any	: (	206												
City: Hobbs	State: NM	Zip	): {	882	41		_	Att	n:	B	sec	ky Has	Lell	1			Ľ .							
Phone #: 575-		1000		10000					dre					1				1 ·						
Project #:	Project Owner		-	-				Cit	y:					1										
	ROY BATTY FED COM #003H (4/							Sta	ate:			Zip:		1				1						
	n: LEA COUNTY, NM							Ph	one	#:				1										
	JEFF ORNELAS	_	-			_		Fai	x #:					1										
FOR LAB USE ONLY			Г			MATRI	x		PR	ESE	RV.	SAMPL	ING	1										
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	SLUDGE	OTHER :	ACID/BASE:	ICE / COOL	OTHER :	DATE	TIME	CI	BTEX	TPH EXT								
11	SP5 @ 7'	G	1			~				1		6/6/18	1:11 PM	1										
12	SP6 @ 1'	G	1			~				-		6/6/18	1:25 PM	1	1	1								
13	SP6 @ 4'	G	1			1				1		6/6/18	2:11 PM	1										
14	SP6 @ 6'	G	1			~				1		6/6/18	2:40 PM	1										
	SP6 @ 8'	6	1			-				-		6/6/18	3:01 PM	1										
	SP6 @ 9'	G	1	L		1				~	-	6/6/18	3:19 PM	1										
	SP7 @ 1'	G	1	L		~				-		6/6/18	3:38 PM	1	1	1								
	SP7 @ 4'	6	1	L		~				-		6/7/18	8:45 AM	1										
19	SP8 @ 1'	G	1			~				~		6/7/18	9:49 AM	1	1	1								
20	SP8 @ 4'	G	1			$\checkmark$				~		6/7/18	10:59 AM	1										

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analyses. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable

service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries.

affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise Phone Result: Add'l Phone #: Relinquished By: Date: Received By: □ Yes No No C Yes No No Fax Result: Add'I Fax #: REMARKS: Time 000 Date: **Received By:** Relinguished Time: Sample Condition CHECKED BY Delivered By: (Circle One) .8% 8(5% Cool Intact Yes Yes No No (Initials) Sampler - UPS - Bus - Other:

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476



### CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page 25 of 25

101 East Marland, Hobbs, NM 88240 (505) 393-2326 FAX (505) 393-2476

Company Name	BBC International, Inc.										B	IL	LTO						AN	ALY	SIS	R	EQUE	ST			
Project Manage	r: Cliff Brunson							Ρ	.0.	#:				_				Т	Т					Т	Т		
Address: P.O.	. Box 805							с	om	par	ıy:	C	OG														
City: Hobbs	State: NM	Zip	: 8	382	41			A	ttn:	:	Be	C	Ky Has	Kell													
Phone #: 575-	397-6388 Fax #: 575	-39	7-0	39	7			A	ddr	ress	s:		5.			1											
Project #:	Project Owner	r: (	00	3				c	ity:																		
	ROY BATTY FED COM #003H (4)							s	tate	e:		z	Zip:														
	n: LEA COUNTY, NM							Р	hor	ne #	ŧ:																
Sampler Name:								F	ax	#:																	
FOR LAB USE ONLY			Г		_	MATE	ЯX		Ρ	RES	SERV	4	SAMPLI	NG	1		1										
Lab I.D.		(G)RAB OR (C)OMP	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	ACID/BACE.	ACID/BASE:	OTHER :		DATE	TIME	17	BTEX	LXJ HOT	10									
21	SP9 @ 1'	C	)			1					1	1	6/7/18	11:22 AM	1	1	1										_
	SP9 @ 3'	6	1	L		-	1		1	`	1	+	6/7/18	11:50 AM	1					_			$\vdash$	1		$\perp$	_
23		6	1	L		1		-	+		1	+	6/7/18	1:20 PM	1	1	1	-		$\rightarrow$	_		-	+	+	_	_
	SP10 @ 4'	G	1	L		1	+	+	+	~	1	+	6/7/18	2:11 PM	1	-	-	-	_	-			1	+	+	+	
	NORTH @ SURFACE	6	1			1	+	+	+	•	1	÷	6/7/18	2:30 PM	1	-		-	_	+	_			-	+	_	_
	SOUTH @ SURFACE	6	1	⊢		-	+	+	+		1	+	6/7/18	3:11 PM	1	-	-	+	_	-	_		-	4	_	+	
	EAST @ SURFACE	6	1	⊢		~	+	-	∔	+		+	6/7/18	2:40 PM	1	-	-	+	-	-	-	-	+-	+	+	+	-
28	WEST @ SURFACE	6	ľ	⊢	-	1	+	+	╋	+	4	ť	6/7/18	2:50 PM	1	-	+	+	-	+	-		+	+	+	+	_
	30 613/18	⊢	⊢	⊢			+	-	∔	+	-	ł			-		+	+	-	+	_		+-	+	+	+	_
PLEASE NOTE: Liability	and Damages. Cardinal's liability and client's exclusive remedy for	any cla	im aris	sing wi	hether	based in	n contr	act or	tort, s	shall b	e limite	d 10	the amount pa	d by the client fo	rthe									_			
analyses. All claims includ	ing those for negligence and any other cause whatsoever shall be Cardinal be liable for incidental or consequental damages, includin	deeme	xd wai	ved un	less m	ade in v	viting	and re	ceive	d by C	Cardina	l wit	thin 30 days afte	er completion of t	he applica	able											
affiliates or successors aris	sing out of or related to the performance of services hereunder by (	Cardina	i, rega	ardies	By	ether su	ch clai	im is b	ased	upon	any of	the	above stated re	Phone Re	58.		95	No	Ac	d'I Ph	onet	<i>t</i> -					
Relinquished B	OTHERS TIME: SOLAN	-			¥	F	_	+	~	/				Fax Resu REMARK	lt:					d'I Fa				_			

CHECKED BY:

(Initials)/

Delivered By: (Circle One)

Sampler - UPS - Bus - Other:

Page 62 of 77

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

000

Sample Condition

Cool Intact Yes Yes No No

Tim

### Dickerson, Ryan

From:	Llull, Christian
Sent:	Thursday, December 8, 2022 3:18 PM
То:	Dickerson, Ryan
Subject:	Fwd: The Oil Conservation Division (OCD) has rejected the application, Application ID: 160531

### **CAUTION:** This email originated from an external sender. Verify the source before opening links or attachments.

To whom it may concern (c/o Christian Llull for COG OPERATING LLC),

The OCD has rejected the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nOY1811735138, for the following reasons:

- The depth to groundwater has not been adequately determined. When nearby wells are used to determine depth to groundwater, the wells should be no further than ½ mile away from the site, and data should be no more than 25 years old, and well construction information should be provided in the submission. The responsible party may choose to remediate to the most stringent levels listed in Table 1 of 19.15.29 NMAC in lieu of drilling to determine the depth to groundwater.
- 1RP-5029 closed. Refer to incident #nOY1811735138 in all future communications.
- Base and sidewalls samples will need to be representative of no more than 200 square feet and analyzed for all constituents in Table I.
- Please submit a complete report through the OCD Permitting website by 3/3/2023.

The rejected C-141 can be found in the OCD Online: Permitting - Action Status, under the Application ID: 160531. Please review and make the required correction(s) prior to resubmitting.

If you have any questions why this application was rejected or believe it was rejected in error, please contact me prior to submitting an additional C-141.

Thank you, Brittany Hall Projects Environmental Specialist - A 505-517-5333 Brittany.Hall@emnrd.nm.gov

### New Mexico Energy, Minerals and Natural Resources Department

1220 South St. Francis Drive Santa Fe, NM 87505

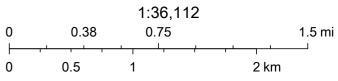
# APPENDIX C Site Characterization Data

# OCD Waterbodies Map



# 9/20/2022, 9:21:57 AM

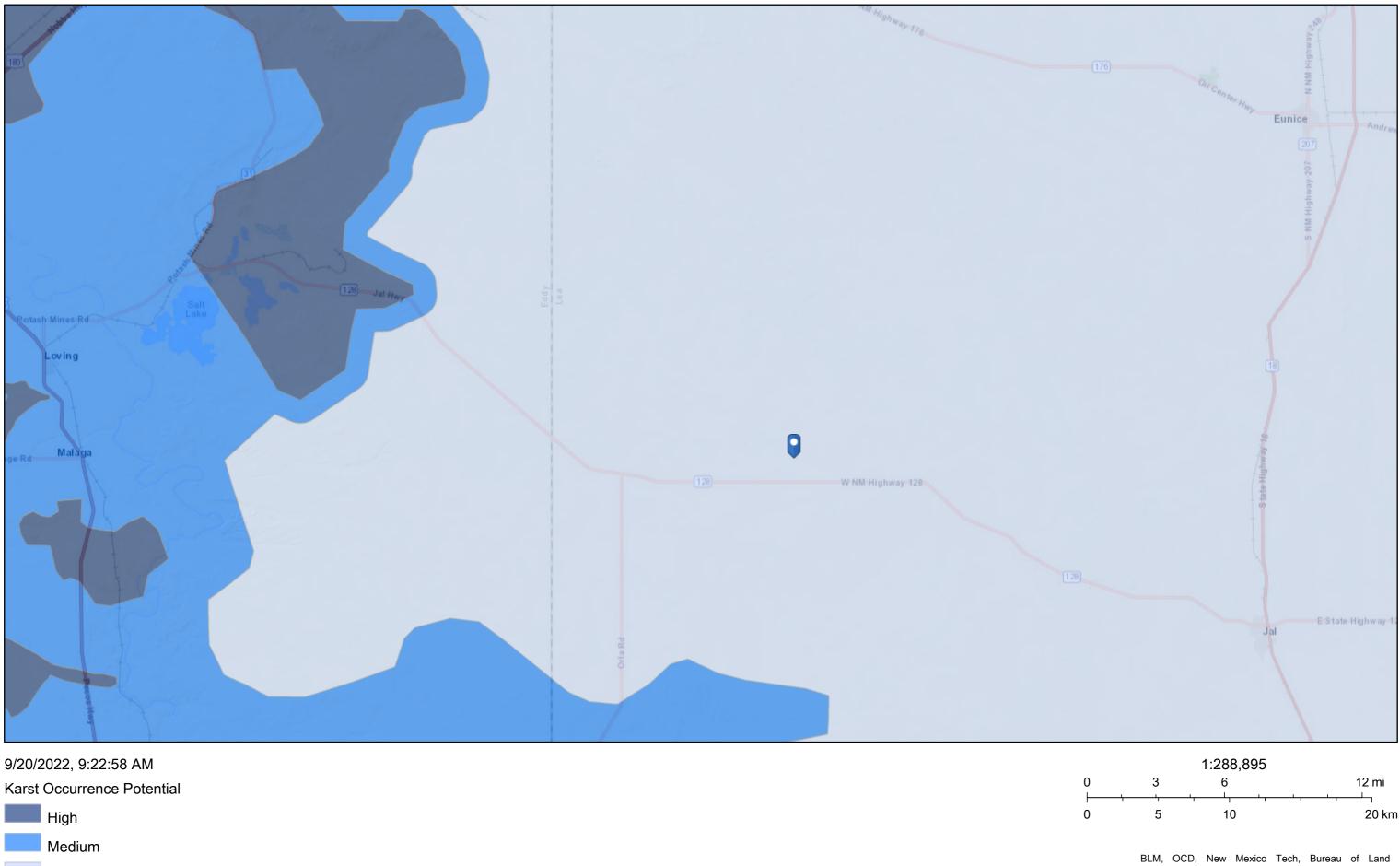
- OSW Water Bodys
- OSE Streams

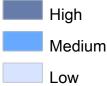


Esri, HERE, Garmin, Maxar, NM OSE

•

# OCD Karst Potential Map





Management, Esri, HERE, Garmin, NGA, USGS, NPS



# New Mexico Office of the State Engineer Water Column/Average Depth to Water

(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)							2=NE : st to lar	3=SW 4= rgest)	,	D83 UTM in me	ters)	(1	n feet)	
	POD Sub-	_	Q		-	_	_	_				-	-	-	Water
POD Number	Code basin Co	ounty	64	16	4	Sec	IWS	Rng		X	Y	Distance	Well	Water	Column
C 03917 POD1	С	LE	4	1	3	13	24S	33E	6383	74	3565212 🌍	1535	600	420	180
C 03662 POD1	С	LE	3	1	2	23	24S	33E	6373	42	3564428 🌍	1951	550	110	440
C 04339 POD6	CUB	LE	3	1	2	23	24S	33E	6373	40	3564386 🌍	1992	60		
											Averaç	ge Depth to	Water:	265	feet
												Minimum	Depth:	110	feet
												Maximum	Depth:	420	feet
Record Count: 3				_											

#### UTMNAD83 Radius Search (in meters):

Easting (X): 637376.36

Northing (Y): 3566379.56

Radius: 2000

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.

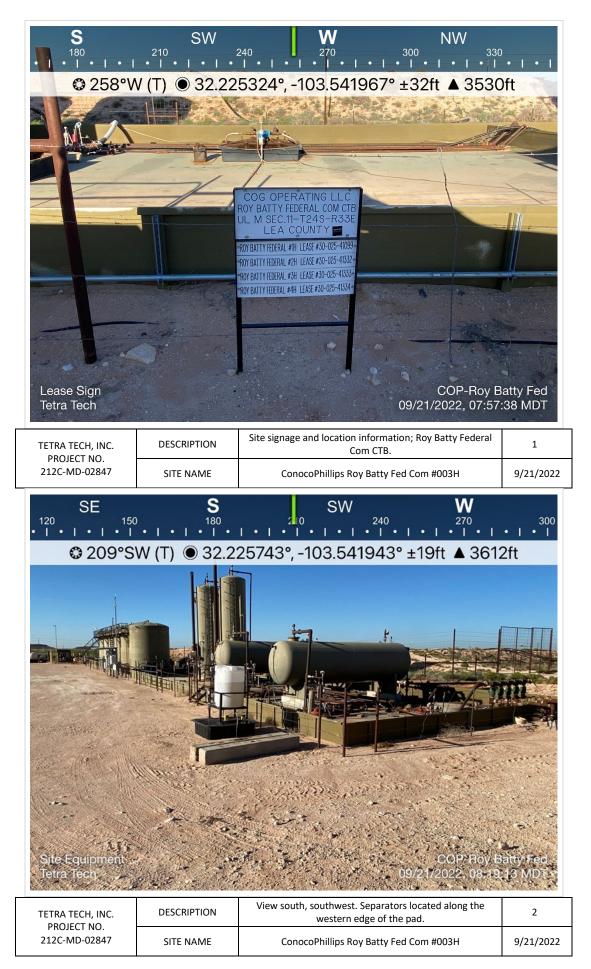
Project Name:       Roy Batty Federal Com #003H Flange Release         Borchole LocationDP6 Coordinates: 32.25714*; -103.540500*       Surface Elevation: 3612 ft         Borchole Number-DTW       Borchole (n): 8       Date Started: 7/30/2022       Date Finished: 7/30/2022         Bit is the intervence of th	212C-N		CD: 12/1 2847	T		ETR/						LOG OF BORING DTW	<u>Page</u> Page 1 of
Soreehole Number.DTW       Borander Diameter (in.): 8       Date Started: 7/30/2022       Date Finished: 7/30/2022         WATER LEVEL OBSERVATIONS       WATER LEVEL OBSERVATIONS         Water Level observations       Y DRY ft         Up to train the started: 1/30/2022       WATER Level OBSERVATIONS         While Drilling Y DRY ft       Upon Completion of Drilling Y DRY ft         Up to train the started: 1/30/2022       Water Level OBSERVATIONS         While Drilling Y DRY ft       Upon Completion of Drilling Y DRY ft         Up to train the started: 1/30/2022       Water Level OBSERVATIONS         While Drilling Y DRY ft       Upon Completion of Drilling Y DRY ft         Upon Completion of Drilling Y DRY ft       While Drilling Y DRY ft         Upon Completion of Drilling Y DRY ft       While Drilling Y DRY ft         Upon Completion of Drilling Y DRY ft       While Drilling Y DRY ft         Upon Completion of Drilling Y DRY ft       Y DRY ft         Upon Completion of Drilling Y DRY ft       Y DRY ft         Started: Light brown fo tan, fine- to medium-grained, dense to very dense, dry, with Caliche read         Upon Completion of Drilling Y DRY ft       Y SP SAND: Light brown to brown, fine- to medium-grained, dense, dry, with occasional silt pockets         Upon Completion of Drilling Y DRY ft       Y SP SAND: Light brown to brown, fine- to medium-grained, dense, dry, with occasional silt pockets </th <th>Project N</th> <th>Nam</th> <th>e: Roy</th> <th>Batty F</th> <th>ede</th> <th>eral C</th> <th>Com</th> <th>#003</th> <th>BH FI</th> <th>ange</th> <th>Rel</th> <th>ease</th> <th></th>	Project N	Nam	e: Roy	Batty F	ede	eral C	Com	#003	BH FI	ange	Rel	ease	
audited valued of DTV     Diameter (n.): 0     Date stated. Notice     Date instruct. Products       audited valued. DTV     audited valued. Notice     Date instruct. Products       audited valued. DTV     audited valued. Notice     audited valued. Notice     Date instruct. Products       audited valued. DTV     audited valued. Notice     audited valued. Notice     audited valued. Notice     audited valued. Notice       audited valued. DTV     audited valued. DTV     audited valued. Notice     audited valued. Notice     audited valued. Notice       audited valued. DTV     audited valued. DTV     audited valued. Notice     audited valued. Notice     audited valued. Notice       audited valued. DTV     audited valued. DTV     audited valued. Notice     audited valued. Notice     audited valued. Notice     audited valued. Notice       audited valued. DTV     audited valued. DTV     audited valued. Notice     audited valued. Notice     audited valued. Notice     audited valued. Notice       audited valued. DTV     audited valued. DTV     audited valued. Notice       audited valued. DTV     audited valued. Notice       audited valued. DTV     audited valued. Notice     audited valued. Notice	Borehole	e Lo	cationGPS	Coordina	ates:	32.22	5714°	, -103.	54055	50°		Surface Elevation: 3612 ft	
Water     Water     Water     Water     Water     Water       While Drilling     Yes     Yes     Yes     Yes     Yes       While Drilling     Yes     Yes     Yes     Yes     Yes       Water     Yes     Yes     Yes     Yes     Yes       While Drilling     Yes     Yes     Yes     Yes     Yes       While Drilling     Yes     Yes     Yes     Yes     Yes       While Drilling     Yes     Yes     Yes     Yes     Yes       Yes     Yes     Yes     Yes     Yes     Yes	Borehole	e Nu	mber:DTV	V						E	Boreh	ole 8 Date Started: 7/30/2022 Date Finished:	7/30/2022
- CALICHE: Pale brown to tan, fine- to     - SM- SILTY SAND: Light brown, fine- to     - SM- CALICHE: Light brown to tan, fine- to     - SM- CALICHE: Light brown to tan, fine- to     - Malum-grained, hard, dry, weakly to moderately	Щ		(ppm)	(mqq)	'ERY (%)	TENT (%)	ocf)		NDEX			WATER LEVEL OBSERVATIONSWhile Drilling $\underline{\nabla}$ DRY ftUpon Completion of Drilling $\underline{\Psi}$ DF	<mark>₹Y_</mark> ft
	DEPTH (ft) OPERATION TYF	SAMPLE			SAMPLE RECOV	MOISTURE CON	DRY DENSITY (p			MINUS NO. 200 (	GRAPHIC LOG	MATERIAL DESCRIPTION (문) 부급 명	REMARKS
	$ \begin{array}{c}                                     $		EXSUK									CALICHE: Pale brown to tan, fine- to coarse-grained, hard, dry (Caliche Pad) -SM- SILTY SAND: Light brown, fine- to medium-grained, dense to very dense, dry, with Caliche nodules 	

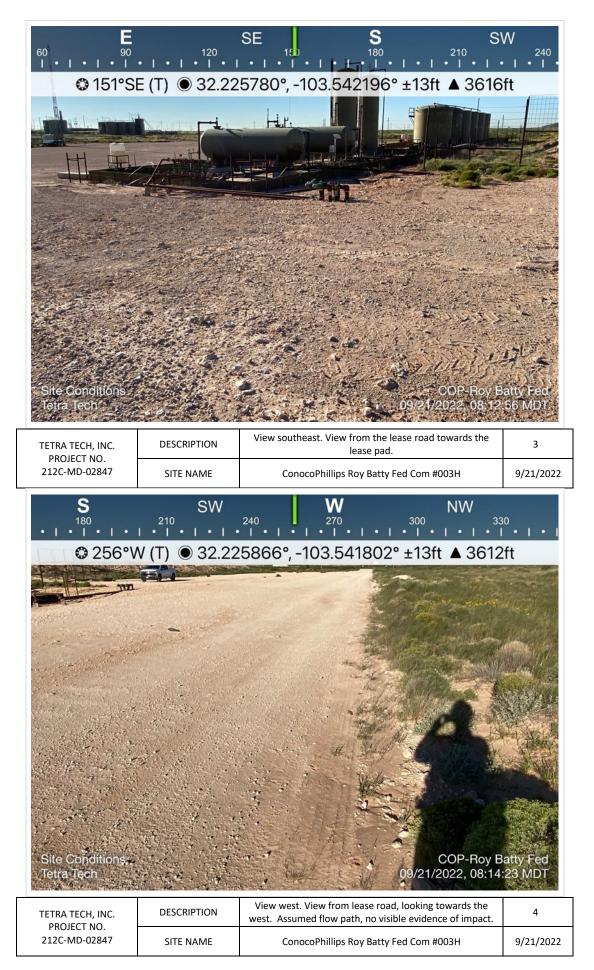
 Logger:
 Drilling Equipment: Air Rotary
 Driller:
 Scarborough Drilling

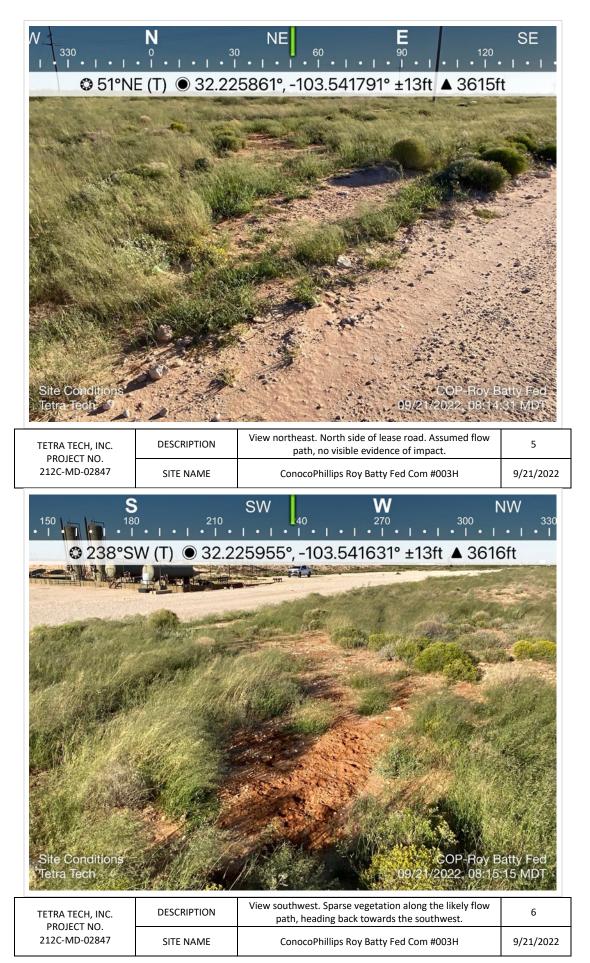
 Released to Finaging:
 12/19/2022 8:24:04 AM
 22` TT\_AUSTIN\_GEOTECH\_NOWELL3` 2015 TT TEMPLATE DECEMBER WELL.GDT'

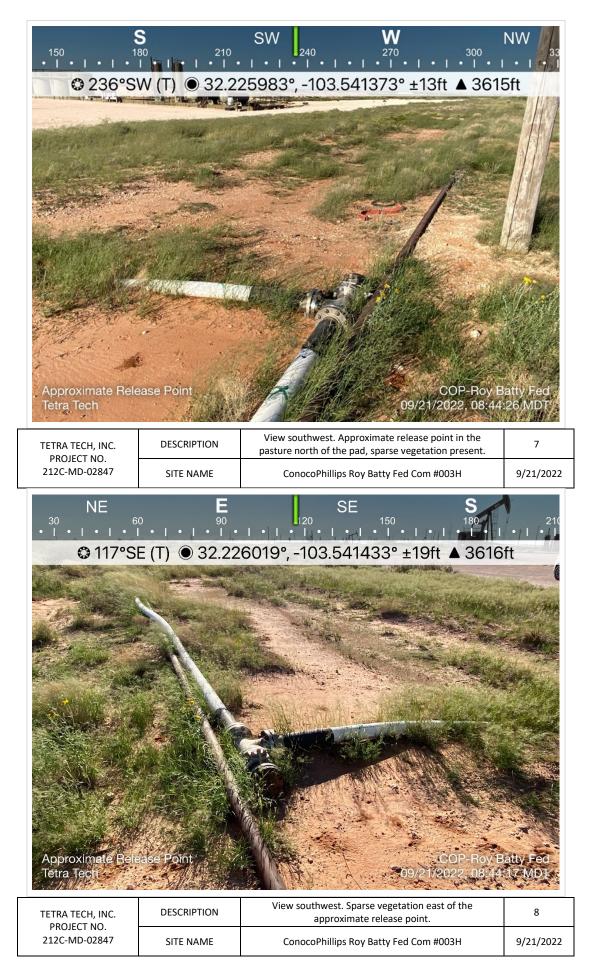
f 77

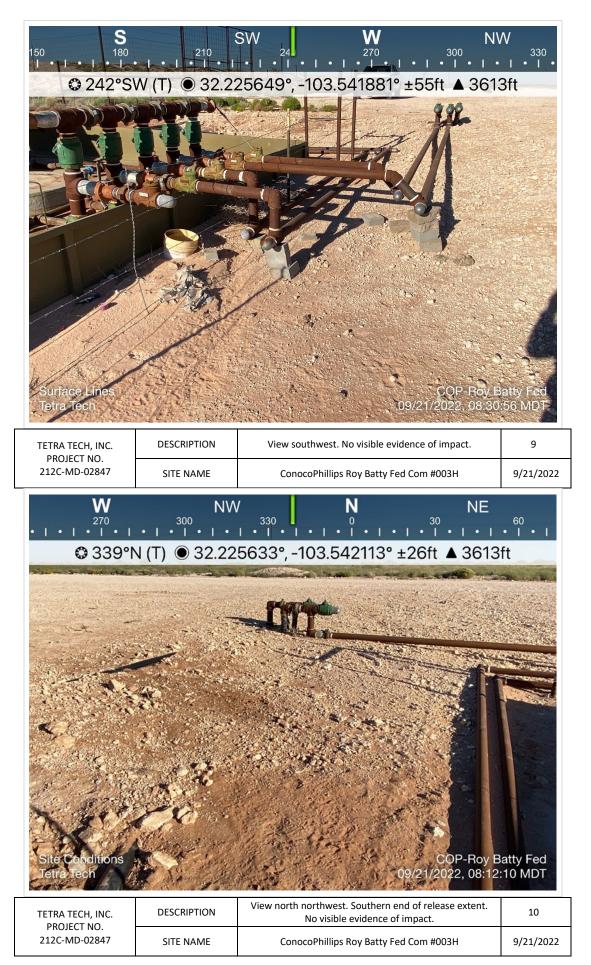
# APPENDIX D Photographic Documentation











# APPENDIX E BLM Seed Mixture Details

(27)

BLM Serial #:

Company Reference:

### 3.2 Seed Mixture for LPC Sand/Shinnery Sites

The holder shall seed all disturbed areas with the seed mixture listed below. The seed mixture shall be planted in the amounts specified in pounds of pure live seed (PLS)\* per acre. There shall be <u>no</u> primary or secondary noxious weeds in the seed mixture. Seed will be tested and the viability testing of seed will be done in accordance with State law(s) and within nine (9) months prior to purchase. Commercial seed will be either certified or registered seed. The seed container will be tagged in accordance with State law(s) and available for inspection by the authorized officer.

Seed will be planted using a drill equipped with a depth regulator to ensure proper depth of planting where drilling is possible. The seed mixture will be evenly and uniformly planted over the disturbed area (smaller/heavier seeds have a tendency to drop the bottom of the drill and are planted first). The holder shall take appropriate measures to ensure this does not occur. Where drilling is not possible, seed will be broadcast and the area shall be raked or chained to cover the seed. When broadcasting the seed, the pounds per acre are to be doubled. The seeding will be repeated until a satisfactory stand is established as determined by the authorized officer. Evaluation of growth will not be made before completion of at least one full growing season after seeding.

Species to be planted in pounds of pure live seed\* per acre:

Species	<u>lb/acre</u>
Plains Bristlegrass	5lbs/A
Sand Bluestem	5lbs/A
Little Bluestem	3lbs/A
Big Bluestem	6lbs/A
Plains Coreopsis	2lbs/A
Sand Dropseed	1lbs/A

\*Pounds of pure live seed: Pounds of seed **x** percent purity **x** percent germination = pounds pure live seed

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

District IV 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

Operator:	OGRID:
COG OPERATING LLC	229137
600 W Illinois Ave	Action Number:
Midland, TX 79701	167824
	Action Type:
	[C-141] Release Corrective Action (C-141)

#### CONDITIONS

Created By	Condition	Condition Date
bhall	None	12/19/2022

CONDITIONS

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Action 167824