



December 16, 2022

Bradford Billings  
Hydrologist/E.Spec.A  
District 2 Artesia  
1220 South St. Francis Drive  
Oil Conservation Division  
Santa Fe, NM 87505

**RE: Interim Closure and Deferral Request  
ConocoPhillips  
Heritage Concho  
Nervous Horz Com #3H Tank Release  
Unit Letter B, Section 36, Township 18 South, Range 31 East  
Eddy County, New Mexico  
Incident ID: nAB1534956719  
2RP-3450**

Mr. Billings:

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips to assess a Heritage Concho release that occurred from a tank battery associated with the Nervous Horz Com #3H (API No. 30-015-37145). The release footprint is located in Public Land Survey System (PLSS) Unit Letter B, Section 36, Township 18 South, Range 31 East, in Eddy County, New Mexico (Site). The approximate release point occurred at coordinates 32.710434°, -103.820831°, as shown on Figures 1 and 2.

## BACKGROUND

According to the State of New Mexico Oil Conservation Division (NMOCD) C-141 Initial Report, the release was discovered on November 24, 2015. The C-141 reports that the cause of the release was a valve being left open on a battery piping. Approximately 30 barrels (bbls) of crude oil were released and approximately 25 bbls of oil were recovered. The release reportedly remained on the oil and gas operations pad within the lined containment. The NMOCD approved the initial C-141 on December 8, 2015, and subsequently assigned the release the Incident ID nAB1534956719 and the remediation permit (RP) number 2RP-3450. The initial C-141 form is included in Appendix A.

## SITE CHARACTERIZATION

A site characterization was performed and no sinkholes, residences, schools, hospitals, institutions, churches, springs, private domestic water wells, playa lakes, stream bodies, 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 not in an area of high karst potential.

There are no water wells listed in the New Mexico Office of the State Engineer (NMOSE) database located within approximately 0.5 miles (800 meters) of the Site. According to data from one (1) water well listed in the NMOSE database within approximately 3.73 miles (6,000 meters) of the site, the minimum depth to groundwater is 430 feet below ground surface (bgs). The site characterization data are presented in Appendix B.

**TETRA TECH**

901 West Wall St., Suite 100, Midland, TX 79701  
Tel 432.682.4559 Fax 432.682.3946 [www.tetrattech.com](http://www.tetrattech.com)

## 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 and in accordance with Table I of 19.15.29.12 NMAC, the RRALs for the Site are as follows:

Constituent	Reclamation Requirements
Chloride	600 mg/kg
TPH	100 mg/kg
BTEX	50 mg/kg

## INITIAL SITE ASSESSMENT AND SAMPLING RESULTS

On January 19, 2016, Concho was onsite to install one (1) soil boring (S1) to a total depth of 4 feet bgs. Although the exact location of the soil boring installed by Concho is unknown, Concho indicated that it may have been placed in front of the tanks to preserve the integrity of the liner. A total of five (5) soil samples were collected from one (1) boring and sent to Cardinal Laboratories in Hobbs, New Mexico to be analyzed for TPH via EPA Method 8015M and BTEX via EPA Method 8021B. The soil samples were not analyzed for chloride during the January 2016 soil assessment activities.

Analytical results from the January 2016 assessment activities are summarized in Table 1. The analytical results associated with the surface sample (S1-SURFACE) exceeded the Site RRALs for TPH (100 mg/kg), BTEX (50 mg/kg), and benzene (10 mg/kg).

## ADDITIONAL SITE ASSESSMENT AND SAMPLING RESULTS

In order to complete the release assessment and delineation per NMOCD regulations, Tetra Tech conducted additional soil sampling at the release site on behalf of ConocoPhillips on January 24 and February 9, 2022. Tetra Tech installed one (1) air rotary soil boring (BH-1) within the release extent to 10 feet bgs to achieve vertical delineation of the release. The BH-1 boring was installed immediately outside of the tank battery containment in order to preserve the integrity of the liner, and because the area inside of the berm was inaccessible to the drill rig. An additional four (4) hand auger borings (AH-1 through AH-4) were installed along the perimeter of the release to depths of 2 feet bgs to complete horizontal delineation of the release. Boring locations are presented in Figure 3.

A total of fifteen (15) soil samples were collected and sent to Cardinal Laboratories in Hobbs, New Mexico to be analyzed for chloride via EPA Method SM4500Cl-B, TPH via EPA Method 8015M and BTEX via EPA Method 8261B.

Analytical results from the 2022 assessment activities are summarized in Table 2. The analytical results associated with the 0–1-foot sampling interval at BH-1 exceeded the Site RRAL for chloride (600 mg/kg). There were no other sampling intervals at BH-1 which exceeded Site RRALs. All analytical results associated with samples from perimeter borings (AH-1 through AH-4) were below the applicable Site RRALs for soils in active oil and gas production areas.

## REMEDIATION WORK PLAN AND ALTERNATIVE CONFIRMATION SAMPLING PLAN

The Release Characterization Work Plan (Work Plan) was prepared by Tetra Tech on behalf of ConocoPhillips and submitted to NMOCD on February 28, 2022, with fee application payment PO Number 8Q2GN-220228-C-1410. The Work Plan described the results of the release assessment and provided characterization of the impact at the site. The Work Plan was approved via email by Bradford Billings of the

NMOCD via email on March 7, 2022. Mr. Billings also executed page 5 of the C-141 form included with the Work Plan. Associated regulatory correspondence is found in Appendix E.

## REMEDIATION ACTIVITIES AND CONFIRMATION SAMPLING

In July 2022, Tetra Tech personnel were onsite to remediate the release as proposed in the approved Work Plan, including excavation, disposal and backfill. Impacted soils were excavated to 1-foot bgs. Per the approved plan, the portions of the release extent that run along energized subsurface lines were hand-dug to 1-foot bgs. Subcontractor personnel exercised caution while working around the energized lines in the release vicinity. All the excavated material was transported offsite for proper disposal. Approximately forty-four (44) cubic yards of material were transported to the R360 Halfway Facility in Hobbs, New Mexico. Copies of the waste manifests are included in Appendix C. Photographs from the excavated areas prior to backfill are provided in Appendix D. During the remedial activities, the liner was found to be intact.

Prior to confirmation sampling, in accordance with Subsection D of 19.15.29.12 NMAC, the NMOCD division district office was notified via email on June 27, 2022. Documentation of associated regulatory correspondence is included in Appendix E. On July 7, 2022, Tetra Tech personnel were onsite for confirmation sampling. Confirmation floor and sidewall samples were collected for laboratory analysis to verify that the impacted materials were properly removed. Each confirmation sample laboratory analytical result was directly compared to the proposed RRALs to demonstrate compliance.

Per the approved Alternative Confirmation Sampling Plan, confirmation samples were collected such that each discrete sample (sidewall and floor) were representative of no more than 500 square feet of excavated area. A total of two (2) floor sample locations and eight (8) sidewall sample locations were used during the remedial activities. Confirmation sidewall sample locations were labeled with "SW"-#, and confirmation floor sample locations were labeled with "FS"-#. Analytical results were reviewed, and the excavation was backfilled.

Upon final review of analytical results, and based on the collected data, two sidewall areas, one in the vicinity of SSW-2 and the other in the vicinity of ESW-1, exhibited analytical results with elevated concentrations of chloride which exceeded the RRALs for the Site. Thus, Tetra Tech and the excavation subcontractor remobilized to the Site and extended the sidewall associated with SSW-2 3 feet to the south.

On July 20, 2022 an iterative confirmation sample, SSW-2 (3'), was collected to encompass the original sample location that triggered removal (nomenclature defined in Table 3) post-additional excavation. The analytical results associated with this secondary sample were below the respective RRALs for the site (Table 3). Photographs from the excavated areas prior to backfill are provided in Appendix D.

Thus, after iterative confirmation sampling at the floor sample and sidewall sample locations, all final confirmation soil samples (floor and sidewall) were below the respective RRALs for chloride, BTEX, and TPH with the exception of ESW-1. A prominent electrical bank and the battery berm border the ESW-1 sampling location. The sidewall in the area of ESW-1 was not able to be extended any further to the east without disturbing the active tank battery, and the lines associated with the electrical bank prevented further excavation in that area. The remaining concentration of chloride in the ESW-1 location was only slightly elevated over the 600 mg/kg RRAL and Section 13 of Rule 29 at P&A will be used at the end of the life of the battery. The results of the July 2022 confirmation sampling events are summarized in Table 3. Laboratory analytical data is included in Appendix F. Excavated areas, depths and confirmation sample locations are shown in Figure 4.

## CONCLUSION

A Closure Request was prepared by Tetra Tech on behalf of ConocoPhillips and submitted to NMOCD on August 4, 2022, with fee application payment PO Number NA8M9-220804-C-1410. The OCD rejected the submitted Application for administrative approval of a release notification and corrective action (C-141), for incident ID (n#) nAB1534956719, for the following reasons:

Interim Closure and Deferral Request  
December 16, 2022

ConocoPhillips

- Submitted report did not include an additional C-141 Page 5 deferral request.
- Resubmit the additional C-141 page 5 requesting a deferral included in the complete report to OCD by January 31, 2023.

## DEFERRAL REQUEST 2022

Based upon the NMOCD rejection from Ashley Maxwell, NMOCD, received on November 18, 2022, a new C-141 deferral form must be signed and submitted to the fee application portal along with this completed revised Interim Closure and Deferral Request. Documentation of associated regulatory correspondence is included in Appendix E. The lined containment area requested for deferral is indicated in Figure 5.

## CONCLUSION

The remediation work completed at the site was successful in removing heavily impacted soils from the release footprint outside of the lined battery. COP requests acceptance of the interim closure for that area in the vicinity of the electrical bank, battery, liner, and aboveground production equipment. After the completion of remedial activities at the Site, the contamination remaining in place is located in areas immediately under and around production equipment inside a lined containment area and does not cause imminent risk to human health, the environment, or groundwater.

Final remediation and reclamation shall take place in accordance with 19.15.29.12 NMAC once the Site is no longer being used for oil and gas production. ConocoPhillips respectfully requests that NMOCD will consider delaying final remediation activities at the Site until the end of life of the battery and associated facility. At time of abandonment, retrofit, or inactivity, remediation will be completed in addition to reclamation. In accordance with the NMOCD-stated request, ConocoPhillips requests deferral for the remaining impacted areas associated with the 2RP-3450 (nAB1534956719) release until Site abandonment. The completed C-141 forms are enclosed as Appendix A.

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

Sincerely,

**Tetra Tech, Inc.**



Christian M. Llull, P.G.  
Program Manager

cc:

Mr. Charles Beauvais, BU – ConocoPhillips

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December 16, 2022

ConocoPhillips

## LIST OF ATTACHMENTS

### Figures:

- Figure 1 – Overview Map
- Figure 2 – Topographic Map
- Figure 3 – Site Assessment Map
- Figure 4 – Remediation Extent and Confirmation Sample Locations

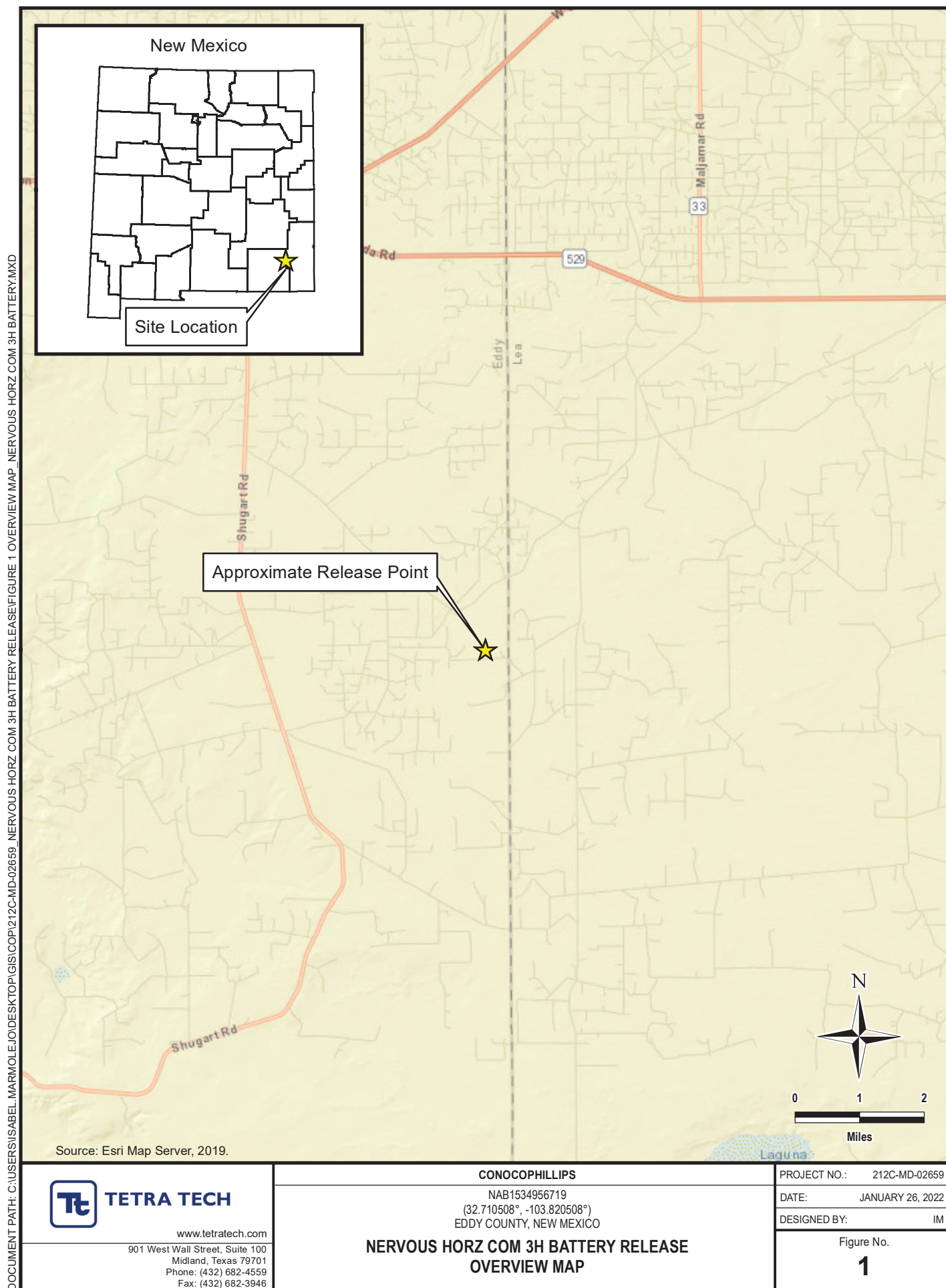
### Tables:

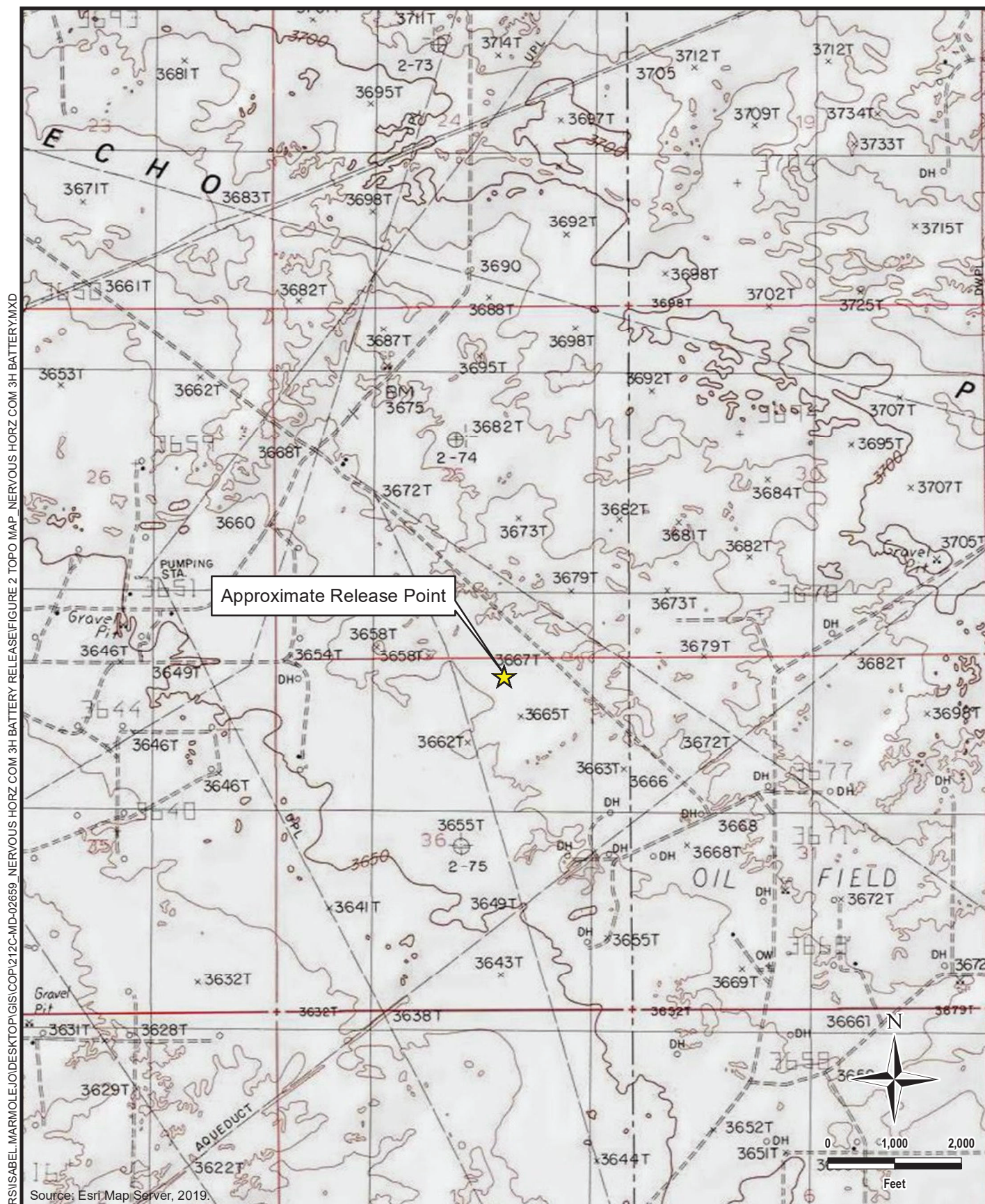
- Table 1 – Summary of Analytical Results – Initial Soil Assessment
- Table 2 – Summary of Analytical Results – Additional Soil Assessment
- Table 3 – Summary of Analytical Results – Soil Remediation

### Appendices:

- Appendix A – C-141 Forms
- Appendix B – Site Characterization Data
- Appendix C – Waste Manifests
- Appendix D – Photographic Documentation
- Appendix E – Regulatory Correspondence
- Appendix F – Laboratory Analytical Report

## FIGURES





**TETRA TECH**

www.tetrattech.com

901 West Wall Street, Suite 100  
Midland, Texas 79701  
Phone: (432) 682-4559  
Fax: (432) 682-3946

CONOCOPHILLIPS

NAB1534956719  
(32.710508°, -103.820508°)  
EDDY COUNTY, NEW MEXICO

**NERVOUS HORZ COM 3H BATTERY RELEASE  
TOPOGRAPHIC MAP**

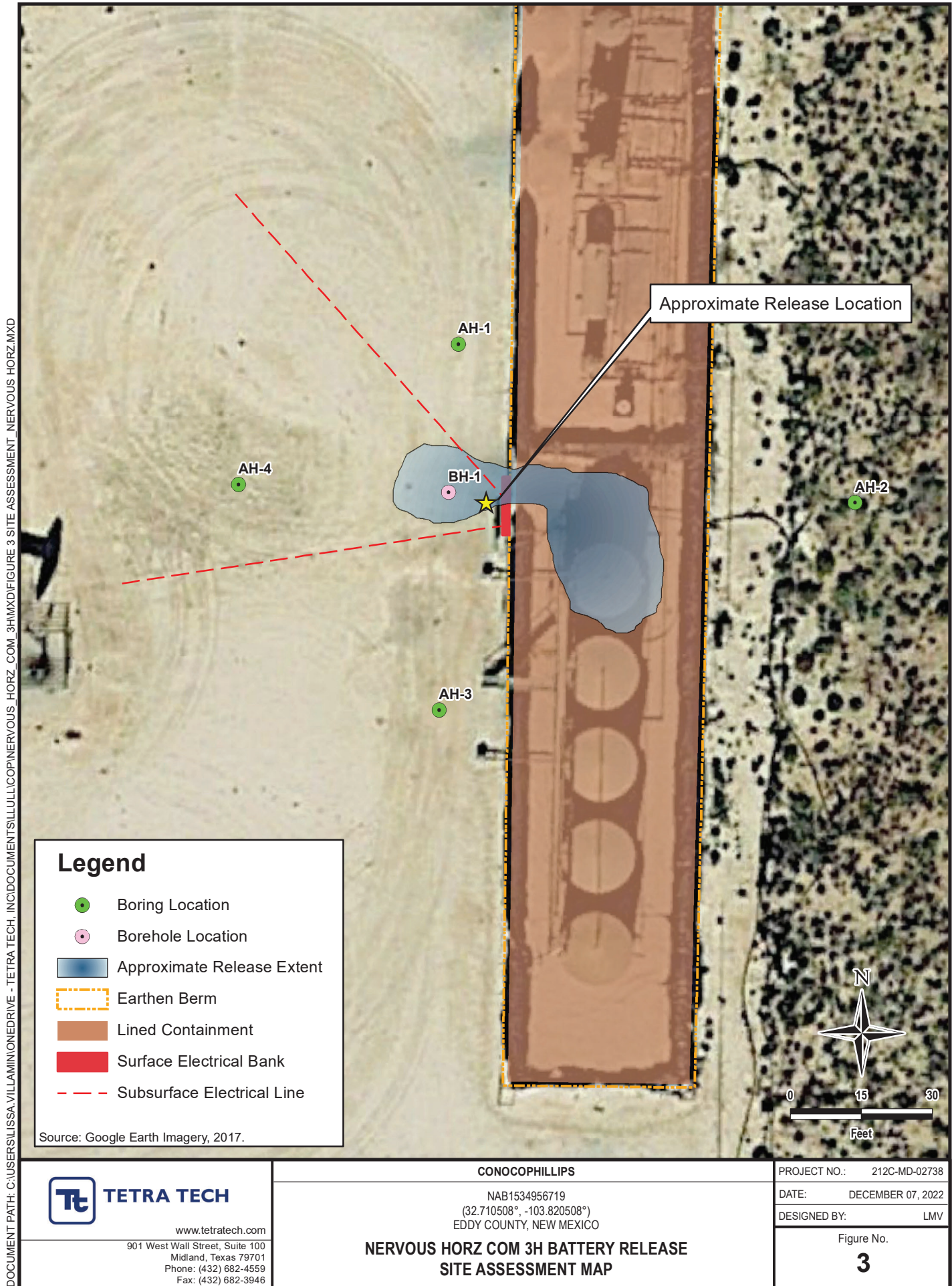
PROJECT NO.: 212C-MD-02659

DATE: JANUARY 26, 2022

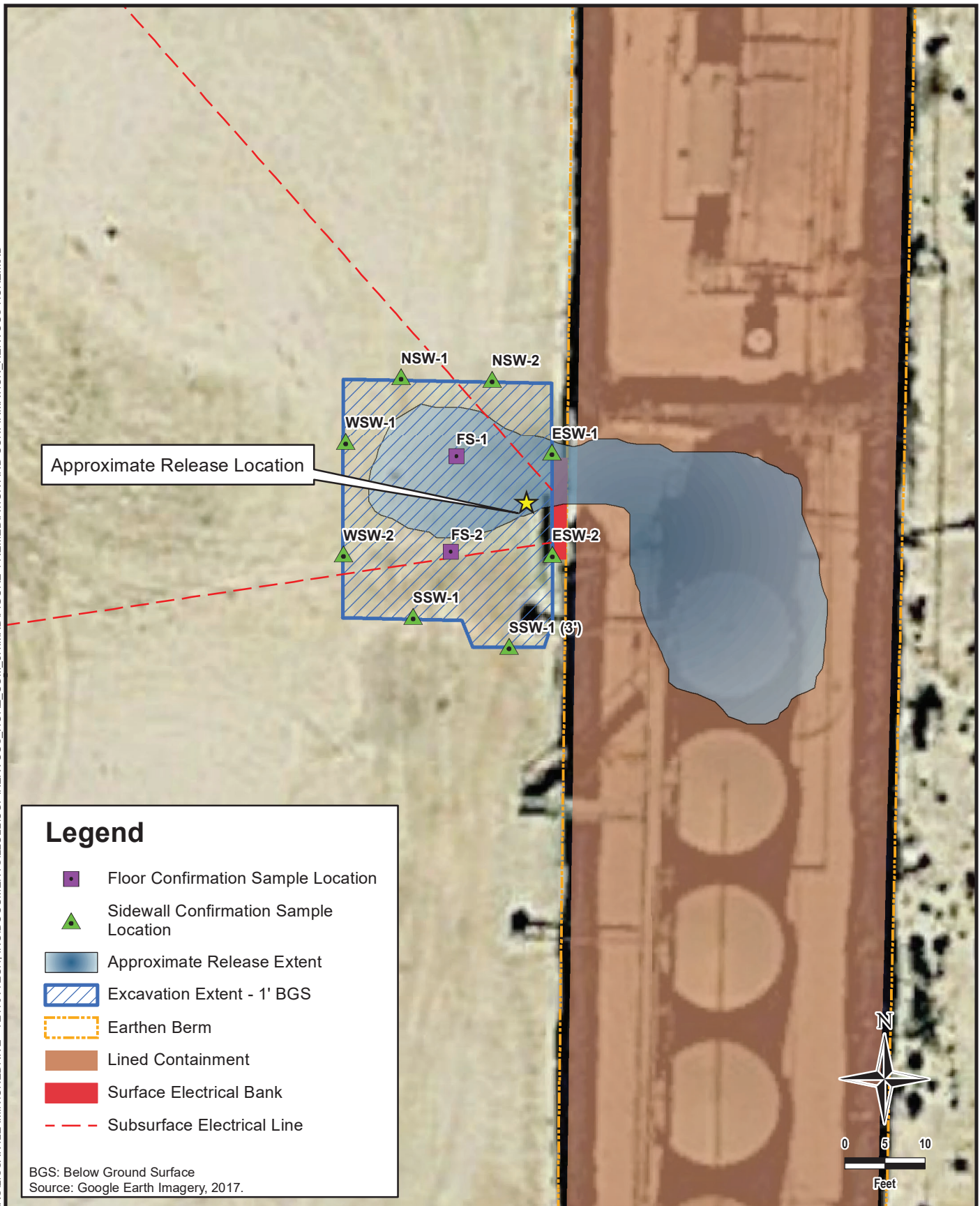
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Figure No.

**2**



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**TETRA TECH**

www.tetrattech.com

901 West Wall Street, Suite 100  
Midland, Texas 79701  
Phone: (432) 682-4559  
Fax: (432) 682-3946

**CONOCOPHILLIPS**

NAB1534956719  
(32.710508°, -103.820508°)  
EDDY COUNTY, NEW MEXICO

**NERVOUS HORZ COM 3H BATTERY RELEASE  
REMEDATION EXTENT AND CONFIRMATION SAMPLE LOCATIONS**

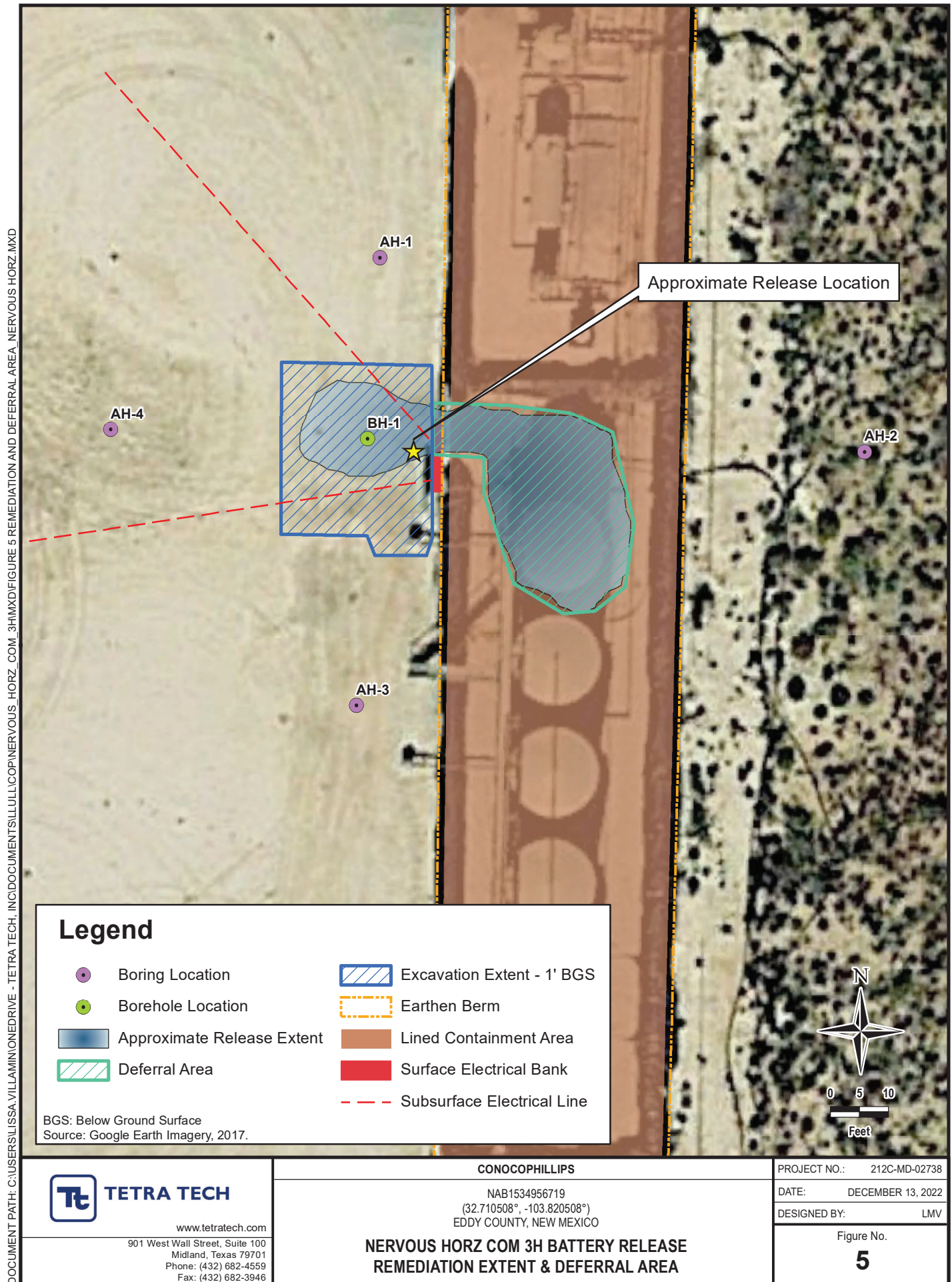
PROJECT NO.: 212C-MD-02738

DATE: DECEMBER 07, 2022

DESIGNED BY: LMV

Figure No.

**4**



## **TABLES**

TABLE 1  
SUMMARY OF ANALYTICAL RESULTS  
INITIAL SOIL ASSESSMENT- 2RP-3450 / NAB1534956719  
HERITAGE CONCHO  
NERVOUS HORZ COM 3H  
EDDY COUNTY, NM

Sample ID	Sample Date	Sample Depth ft. bgs	BTX <sup>2</sup>						TPH <sup>3</sup>		
			Benzene		Toluene		Ethylbenzene		Total Xylenes		Total TPH (GRO+DRO)
			mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	
S1-SURFACE	1/19/2016	SURFACE	<b>11.5</b>		107		51.2		118		<b>3080</b>
S1-1'	1/19/2016	1	< 0.050		0.390		0.107		0.426		
S1-2'	1/19/2016	2	< 0.050		0.064		< 0.050		< 0.150		12.1
S1-3'	1/19/2016	3	< 0.050		0.193		0.191		0.665		10.7
S1-4'	1/19/2016	4	0.134		3.12		2.17		7.02		-
									103	712	815

## NOTES:

ft. Feet

bgs Below ground surface

mg/kg Milligrams per kilogram

TPH Total Petroleum Hydrocarbons

GRO Gasoline range organics

DRO Diesel range organics

1 Method 8021B

2 Method 8015M

***Bold and italicized values indicate exceedance of proposed Remediation RRLs***

TABLE 2  
SUMMARY OF ANALYTICAL RESULTS  
ADDITIONAL SOIL ASSESSMENT- 2RP-3450 / NAB1534956719  
HERITAGE CONCHO  
NERVOUS HORZ COM 3H  
EDDY COUNTY, NM

Sample ID	Sample Date	Sample Depth ft. bgs	Field Screening Results		Chloride <sup>1</sup>		BTEX <sup>2</sup>												TPH <sup>3</sup>				Total TPH (GRO+DRO+EXT DRO) mg/kg	
			Chloride	PID	mg./kg	Q	Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO		DRO		EXT DRO			
							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
BH-1	1/24/2022	0-1	-	-	12,600		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			-
		2-3	-	-	272		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			-
		3-4	-	-	160		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			-
		4-5	-	-	96.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			-
		6-7	-	-	80.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			-
		8-9	-	-	96.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			-
		9-10	-	-	80.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			-
AH-1	2/9/2022	0-1	311	-	208		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			-
		1-2	402	-	224		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			-
AH-2	2/9/2022	0-1	23.2	-	16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			-
		1-2	70.2	-	32.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			-
AH-3	2/9/2022	0-1	39.4	-	16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			-
		1-2	253.3	-	32.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			-
AH-4	2/9/2022	0-1	75.1	-	48.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			-
		1-2	72.4	-	48.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0			-

## NOTES:

ft. Feet

bgs Below ground surface

mg/kg Milligrams per kilogram

TPH Total Petroleum Hydrocarbons

GRO Gasoline range organics

DRO Diesel range organics

1 Method SM4500C1-B

2 Method 8021B

3 Method 8015M

**Bold and italicized values indicate exceedance of proposed Remediation RBALs and Reclamation Requirements.**

Shaded rows indicate intervals proposed for excavation.

## QUALIFIERS:

TABLE 3  
SUMMARY OF ANALYTICAL RESULTS  
SOIL REMEDIATION - NAB1534956719  
CONOCOPHILLIPS  
NERVOUS HORZ COM #3H TANK RELEASE  
EDDY COUNTY, NM

Sample ID	Sample Date	Sample Depth ft. bgs	Chloride <sup>1</sup>		BTEX <sup>2</sup>						TPH <sup>3</sup>																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																							
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FS-1	7/7/2022	1	224	<0.050	<0.050	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0

NOTES:

- ft. Feet
- bgs Below ground surface
- mg/kg Milligrams per kilogram
- TPH Total Petroleum Hydrocarbons
- GRO Gasoline range organics
- DRO Diesel range organics
- 1 Method SM4500Cl-B
- 2 Method 8021B
- 3 Method 8015M

**Bold and italicized values indicate exceedance of proposed Remediation RRLs and Reclamation Requirements.**  
Gold highlight represents soil horizons that were removed during deepening of excavation floors.  
Green highlight represents soil intervals that were removed during horizontal expansion of excavation sidewalls.  
\* These iterative samples are located to encompass the original sample location that triggered removal, with further excavation in each area indicated in (I).

QUALIFIERS:

QM-07 The spiker recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.

## **APPENDIX A C-141 Forms**

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

State of New Mexico  
Energy Minerals and Natural Resources

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

Form C-141  
Revised August 8, 2011

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

### Release Notification and Corrective Action

NAB1534956719

#### OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: COG Operating LLC 229137	Contact: Robert McNeill
Address: 600 West Illinois Avenue, Midland TX 79701	Telephone No. 432-230-0077
Facility Name: Nervous Horz Com #3H	Facility Type: Battery

Surface Owner: State	Mineral Owner:	API No. 30-015-37145
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#### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
B	36	18S	31E	330'	North	1980'	East	Eddy

Latitude 32.710434 Longitude -103.8208313

#### NATURE OF RELEASE

Type of Release: Oil	Volume of Release: 30 bbls Oil	Volume Recovered: 25 bbls Oil
Source of Release: Open Valve	Date and Hour of Occurrence: 11/24/2015 7:30 am	Date and Hour of Discovery: 11/24/2015 7:30 am
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Mike Bratcher - NMOCD	
By Whom? Lupe Carrasco	Date and Hour: Tue 11/24/2015 3:34 PM	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

This release was caused when a valve was left open on battery piping. Vacuum trucks were dispatched to recover all standing fluid.

Describe Area Affected and Cleanup Action Taken.\*

This release occurred within a lined containment, however we are further investigating the release. Fluids were recovered, the facility cleaned and put back into service. Concho will have the spill site sampled to delineate any possible contamination from the release and we will present a remediation work plan to the NMOCD for approval prior to any significant remediation work.

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.

Signature: <i>Amanda T. Davis</i>	OIL CONSERVATION DIVISION	
Printed Name: Amanda Trujillo Davis	Approved by Environmental Specialist: <i>[Signature]</i>	
Title: Senior Environmental Coordinator	Approval Date: 12/15/15	Expiration Date: N/A
E-mail Address: atrujillo@concho.com	Conditions of Approval: Remediation per O.C.D. Rules & Guidelines SUBMIT REMEDIATION PROPOSAL NO LATER THAN: 1/16/16	
Date: December 8, 2015 Phone: 575-748-6940	Attached <input type="checkbox"/>	

\* Attach Additional Sheets If Necessary

2RP-3450

Incident ID	NAB1534956719
District RP	2RP-3450
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?	430 (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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 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.

State of New Mexico  
Oil Conservation Division

Page 4

Incident ID	NAB1534956719
District RP	2RP-3450
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: Charles R. Beauvais Title: Senior Environmental EngineerSignature: Charles R. Beauvais ?? Date: 2/28/2022email: charles.r.beauvais@conocophillips.com Telephone: 575-988-2043**OCD Only**Received by: Jocelyn Harimon Date: 12/16/2022

Incident ID	NAB1534956719
District RP	2RP-3450
Facility ID	
Application ID	

## Remediation Plan

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

- ☒ Detailed description of proposed remediation technique
- ☒ Scaled sitemap with GPS coordinates showing delineation points
- ☒ 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.

Printed Name: Charles R. Beauvais Title: Senior Environmental Engineer  
Signature: Charles R. Beauvais 99 Date: 2/28/2022  
email: charles.r.beauvais@conocophillips.com Telephone: 575-988-2043

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

☐ Approved ☒ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: Bradford Billings Date: 03/07/2022

Incident ID	NAB1534956719
District RP	2RP-3450
Facility ID	
Application ID	

## Remediation Plan

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

- ☐ Detailed description of proposed remediation technique
- ☐ Scaled sitemap with GPS coordinates showing delineation points
- ☐ Estimated volume of material to be remediated
- ☐ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
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Printed Name: Charles R. Beauvais Title: Senior Environmental Engineer  
Signature: Charles R. Beauvais 99 Date: 12/15/2022  
email: charles.r.beauvais@conocophillips.com Telephone: 575-988-2043

**OCD Only**

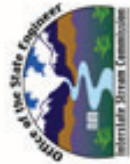
Received by: Jocelyn Harimon Date: 12/16/2022

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☒ Deferral Approved

Signature: Buttan Hall Date: 12/28/2022

## **APPENDIX B**

### **Site Characterization Data**



# 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)

(quarters are 1=NW 2=NE 3=SW 4=SE)  
(quarters are smallest to largest) (NAD83 UTM in meters) (In feet)

POD Number	Sub-basin	Code	POD				County	Tws	Rng	X	Y	Distance	Depth	Water Column
			Q	Q	Q	Q								
CP 00849	LE	CP	64	16	4	3	35	18S	31E	608012	3618757*	2712	300	
CP 00672	LE	CP	4	4	07	4	07	18S	32E	612475	3624947*	5506	524	94
CP 00672	LE	O	4	4	07	4	07	18S	32E	612475	3624947*	5506	540	80
Average Depth to Water:													445 feet	
Minimum Depth:													430 feet	
Maximum Depth:													460 feet	

Record Count: 3

UTMNAD83 Radius Search (in meters):

Easting (X): 610515 Northing (Y): 3619801 Radius: 6000

\*UTM location was derived from PLSS - see Help

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.

1/11/22 9:26 AM

WATER COLUMN/ AVERAGE DEPTH TO  
WATER

# Nervous Horz COM 3H

First Potential

## Legend



Approximate Release Point



High



Low



Medium

Maljamar

Loco Hills

529

529

82

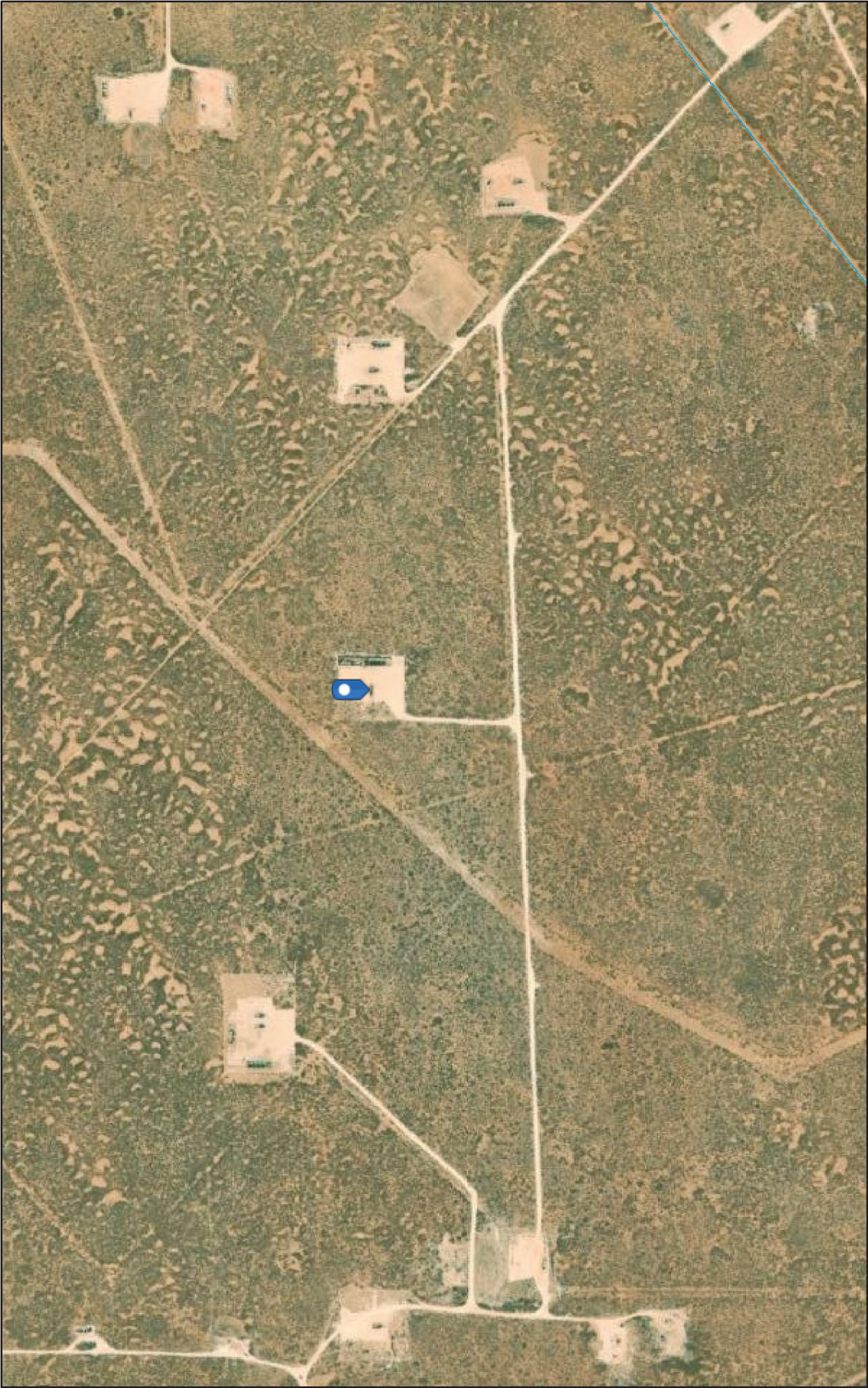
82

82

☆ Approximate Release Point



OCD Water Bodies



1/11/2022, 11:36:13 AM

- ★ OCD District Offices
- PLJV Probable Playas
- OSE Water-bodies
- OSE Streams

1:9,028

0 0.05 0.1 0.2 0.4 km  
0 0.1 0.2 0.4 mi  
OCD, Maxar

## **APPENDIX C**

### **Waste Manifests**



Permian Basin

Customer: CONOCOPHILLIPS  
Customer #: CRI2190  
Ordered by: JOE TYER  
AFE #:  
PO #:  
Manifest #: 02  
Manif. Date: 7/7/2022  
Hauler: MCNABB PARTNERS  
Driver: ISAIAH  
Truck #: M02  
Card #  
Job Ref #

Ticket #: 700-1322579  
Bid #: O6UJ9A000JEC  
Date: 7/7/2022  
Generator: CONOCOPHILLIPS  
Generator #:  
Well Ser. #: 37145C  
Well Name: NERVOUS HORZ COM  
Well #: 3H  
Field:  
Field #:  
Rig: NON-DRILLING  
County: EDDY (NM)

Facility: CRI

Product / Service

Quantity Units

Contaminated Soil (RCRA Exempt)

10.00 yards

**Generator Certification Statement of Waste Status**

I hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination, the above described waste is:

- ☒ RCRA Exempt: Oil Field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste  
☐ RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24 or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items):  
☐ MSDS Information ☐ RCRA Hazardous Waste Analysis ☐ Process Knowledge ☐ Other (Provide description above)

Driver/ Agent Signature

R360 Representative Signature

Customer Approval

**THIS IS NOT AN INVOICE!**

Approved By: \_\_\_\_\_

Date: \_\_\_\_\_



Permian Basin

Customer: CONOCOPHILLIPS  
 Customer #: CRI2190  
 Ordered by: JOE TYLER  
 AFE #:  
 PO #:  
 Manifest #: 01  
 Manif. Date: 7/7/2022  
 Hauler: MCNABB PARTNERS  
 Driver: ISAIAH  
 Truck #: M02  
 Card #  
 Job Ref #

Ticket #: 700-1322539  
 Bid #: O6UJ9A000JEC  
 Date: 7/7/2022  
 Generator: CONOCOPHILLIPS  
 Generator #:  
 Well Ser. #: 37145C  
 Well Name: NERVOUS HORZ COM  
 Well #: 3H  
 Field:  
 Field #:  
 Rig: NON-DRILLING  
 County: EDDY (NM)

Facility: CRI

Product / Service	Quantity Units
Contaminated Soil (RCRA Exempt)	10.00 yards

**Generator Certification Statement of Waste Status**

I hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination, the above described waste is:

- ☒ RCRA Exempt: Oil Field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste  
☐ RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24 or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items):  
☐ MSDS Information ☐ RCRA Hazardous Waste Analysis ☐ Process Knowledge ☐ Other (Provide description above)

Driver/ Agent Signature

R360 Representative Signature

Customer Approval

**THIS IS NOT AN INVOICE!**

Approved By: \_\_\_\_\_

Date: \_\_\_\_\_



Permian Basin

Customer: CONOCOPHILLIPS  
 Customer #: CRI2190  
 Ordered by: CHARLES BEAUVAIS  
 AFE #:  
 PO #:  
 Manifest #: 03  
 Manif. Date: 7/8/2022  
 Hauler: MCNABB PARTNERS  
 Driver: ISAIAH  
 Truck #: M02  
 Card #  
 Job Ref #

Ticket #: 700-1322913  
 Bid #: O6UJ9A000JEC  
 Date: 7/8/2022  
 Generator: CONOCOPHILLIPS  
 Generator #:  
 Well Ser. #: 37145C  
 Well Name: NERVOUS HORZ COM  
 Well #: 3H  
 Field:  
 Field #:  
 Rig: NON-DRILLING  
 County: EDDY (NM)

Facility: CRI

Product / Service	Quantity Units
Contaminated Soil (RCRA Exempt)	10.00 yards

**Generator Certification Statement of Waste Status**

I hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination, the above described waste is:

- ☒ RCRA Exempt: Oil Field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste  
☐ RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24 or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items):  
☐ MSDS Information    ☐ RCRA Hazardous Waste Analysis    ☐ Process Knowledge    ☐ Other (Provide description above)

Driver/ Agent Signature

R360 Representative Signature

Customer Approval

**THIS IS NOT AN INVOICE!**

Approved By: \_\_\_\_\_

Date: \_\_\_\_\_



Permian Basin

Customer: CONOCOPHILLIPS  
 Customer #: CRI2190  
 Ordered by: CHARLES BEAUVAIS  
 AFE #:  
 PO #:  
 Manifest #: 04  
 Manif. Date: 7/8/2022  
 Hauler: MCNABB PARTNERS  
 Driver: ISAIAH  
 Truck #: M02  
 Card #  
 Job Ref #

Ticket #: 700-1322957  
 Bid #: O6UJ9A000JEC  
 Date: 7/8/2022  
 Generator: CONOCOPHILLIPS  
 Generator #:  
 Well Ser. #: 37145C  
 Well Name: NERVOUS HORZ COM  
 Well #: 3H  
 Field:  
 Field #:  
 Rig: NON-DRILLING  
 County: EDDY (NM)

Facility: CRI

Product / Service	Quantity Units
Contaminated Soil (RCRA Exempt)	6.00 yards

**Generator Certification Statement of Waste Status**

I hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination, the above described waste is:

☒ RCRA Exempt: Oil Field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste  
☐ RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24 or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items):  
☐ MSDS Information ☐ RCRA Hazardous Waste Analysis ☐ Process Knowledge ☐ Other (Provide description above)

Driver/ Agent Signature

R360 Representative Signature

Customer Approval

**THIS IS NOT AN INVOICE!**

Approved By: \_\_\_\_\_

Date: \_\_\_\_\_



Permian Basin

Customer: CONOCOPHILLIPS  
Customer #: CRI2190  
Ordered by: CHARLES BEAUVAIS  
AFE #:  
PO #:  
Manifest #: 1  
Manif. Date: 7/26/2022  
Hauler: MCNABB PARTNERS  
Driver: JR  
Truck #: M02  
Card #  
Job Ref #

Ticket #: 700-1329056  
Bid #: O6UJ9A000JEC  
Date: 7/26/2022  
Generator: CONOCOPHILLIPS  
Generator #:  
Well Ser. #: 37145C  
Well Name: NERVOUS HORZ COM  
Well #: 3H  
Field:  
Field #:  
Rig: NON-DRILLING  
County: EDDY (NM)

Facility: CRI

Product / Service

Quantity Units

Contaminated Soil (RCRA Exempt)

10.00 yards  
8.00**Generator Certification Statement of Waste Status**

I hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination, the above described waste is:

☒ RCRA Exempt: Oil Field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste  
☐ RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24 or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items):  
☐ MSDS Information ☐ RCRA Hazardous Waste Analysis ☐ Process Knowledge ☐ Other (Provide description above)

Driver/ Agent Signature

R360 Representative Signature

Customer Approval

**THIS IS NOT AN INVOICE!**

Approved By: \_\_\_\_\_

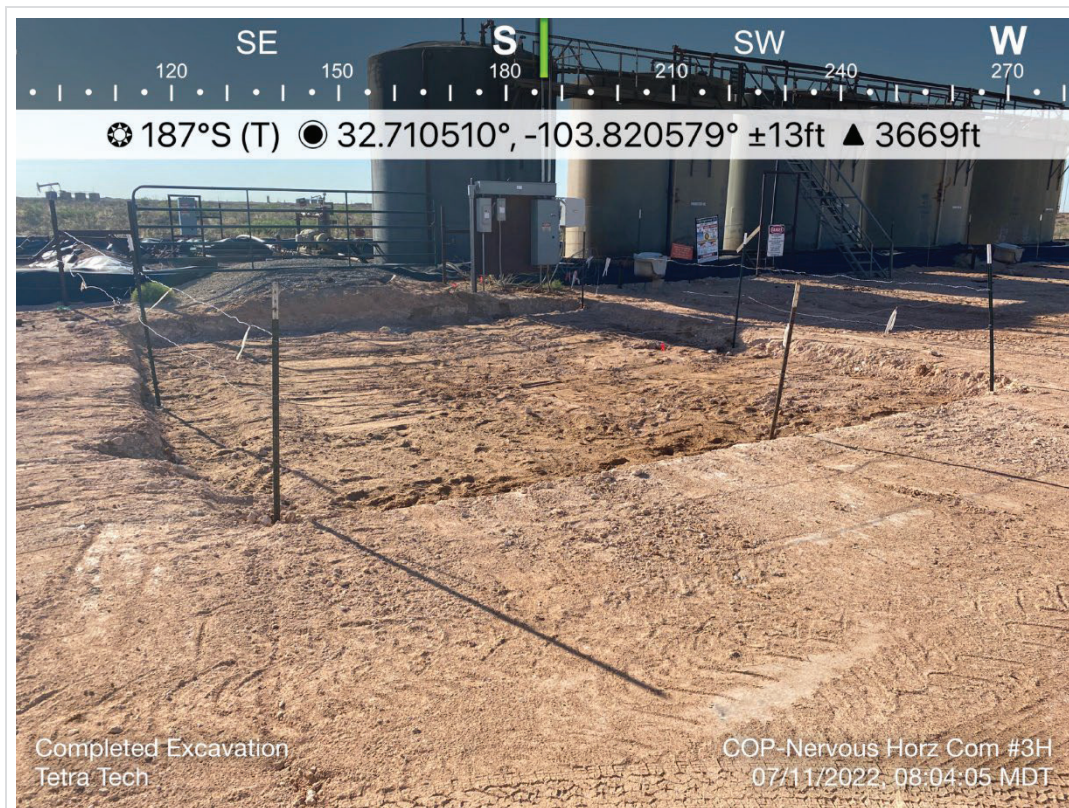
Date: \_\_\_\_\_

t6UJ9A01P8AQ

7/26/2022 11:27:06AM

## **APPENDIX D**

# **Photographic Documentation**



TETRA TECH, INC. PROJECT NO. 212C-MD-02738	DESCRIPTION	View south of the excavation area.	1
	SITE NAME	ConocoPhillips Nervous Horz Com #3H Tank Release	7/11/2022



TETRA TECH, INC. PROJECT NO. 212C-MD-02738	DESCRIPTION	View east of the excavation area.	2
	SITE NAME	ConocoPhillips Nervous Horz Com #3H Tank Release	7/11/2022



TETRA TECH, INC. PROJECT NO. 212C-MD-02738	DESCRIPTION	View north of the backfilled excavation area.	3
	SITE NAME	ConocoPhillips Nervous Horz Com #3H Tank Release	7/11/2022



TETRA TECH, INC. PROJECT NO. 212C-MD-02738	DESCRIPTION	View southeast of the backfilled excavation area.	4
	SITE NAME	ConocoPhillips Nervous Horz Com #3H Tank Release	7/11/2022

## **APPENDIX E**

### **Regulatory Correspondence**

**Abbott, Sam**

---

**From:** OCDOnline@state.nm.us  
**Sent:** Monday, March 7, 2022 12:42 PM  
**To:** Llull, Christian  
**Subject:** The Oil Conservation Division (OCD) has approved the application, Application ID: 84753

 **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 approved the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nAB1534956719, with the following conditions:

- **DTW determination not accurate enough. However, it appears you may be able to excavate on pad to 50 foot or less Table 1 needs in the range of 1-2 feet. Requested confirm samples at better than 700 sq/ft is denied but you can go to a max of 500 sq/ft. If acceptable, carry on.**

The signed C-141 can be found in the OCD Online: Imaging under the incident ID (n#).

If you have any questions regarding this application, please contact me.

Thank you,  
Bradford Billings  
Hydrologist/E.Spec.A  
505-670-6549  
bradford.billings@state.nm.us

**New Mexico Energy, Minerals and Natural Resources Department**  
1220 South St. Francis Drive  
Santa Fe, NM 87505

**Poole, Nicholas**

---

**From:** Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>  
**Sent:** Tuesday, June 28, 2022 9:19 AM  
**To:** Poole, Nicholas; Enviro, OCD, EMNRD  
**Cc:** Abbott, Sam; Llull, Christian  
**Subject:** RE: [EXTERNAL] Incident ID: NAB1534956719 - Confirmation Sampling

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

Hello.

Thanks for the notification. Please copy this and include in allied report(s).

Bradford Billings  
EMNRD/OCD

---

**From:** Poole, Nicholas <NICHOLAS.POOLE@tetrattech.com>  
**Sent:** Monday, June 27, 2022 3:10 PM  
**To:** Enviro, OCD, EMNRD <OCD.Enviro@state.nm.us>  
**Cc:** Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Abbott, Sam <Sam.Abbott@tetrattech.com>; Llull, Christian <Christian.Llull@tetrattech.com>  
**Subject:** [EXTERNAL] Incident ID: NAB1534956719 - Confirmation Sampling

**CAUTION:** This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Incident ID (n#) **NAB1534956719** (Nervous Horz Com #3H)

To whom it may concern,

In accordance with Subsection D of 19.15.29.12 NMAC, the responsible party must verbally notify the appropriate division district office prior to conducting confirmation sampling.

Remediation activities are beginning at the site this week.

Thus, on behalf of ConocoPhillips for the above referenced incident, Tetra Tech is duly providing this communication which serves as notification that final confirmation sampling will be conducted at this site Wednesday, June 29, 2022

**NOTE:** If you have any questions regarding this sampling schedule, please contact me.

**Nicholas Poole** | Staff Geoscientist  
Mobile +1 (512) 560-9064 | [nicholas.poole@tetrattech.com](mailto:nicholas.poole@tetrattech.com)

**Tetra Tech** | *Leading with Science*® | OGA  
8911 N. Capital of Texas Highway | Bldg. 2, Suite 2310 | Austin, TX 78759 | [tetrattech.com](http://tetrattech.com)

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**Poole, Nicholas**

---

**From:** OCDOnline@state.nm.us  
**Sent:** Friday, November 18, 2022 3:29 PM  
**To:** Llull, Christian  
**Subject:** The Oil Conservation Division (OCD) has rejected the application, Application ID: 131537

 **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#) nAB1534956719, for the following reasons:

- **Submitted report did not include an additional C-141 Page 5 deferral request.**
- **Resubmit the additional C-141 page 5 requesting a deferral included in the complete report to OCD by January 31, 2023.**

The rejected C-141 can be found in the OCD Online: Permitting - Action Status, under the Application ID: 131537. 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,  
Ashley Maxwell  
Projects Environmental Specialist - A  
505-635-5000  
Ashley.Maxwell@emnrd.nm.gov

**New Mexico Energy, Minerals and Natural Resources Department**  
1220 South St. Francis Drive  
Santa Fe, NM 87505

## **APPENDIX F**

### **Laboratory Analytical Data**



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

---

July 08, 2022

CHRISTIAN LLULL

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: NERVOUS HORZ COM #3H TANK RELEASE

Enclosed are the results of analyses for samples received by the laboratory on 07/07/22 14:18.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-22-15. 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 [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

Cardinal Laboratories is accredited 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,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is fluid and cursive, with the first name "Celey" and last name "Keene" clearly distinguishable.

Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	07/07/2022	Sampling Date:	07/07/2022
Reported:	07/08/2022	Sampling Type:	Soil
Project Name:	NERVOUS HORZ COM #3H TANK RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C-MD - 02738	Sample Received By:	Shalyn Rodriguez
Project Location:	COP - EDDY CO NM		

**Sample ID: FS - 01 (H222919-01)**

BTEX 8021B			mg/kg		Analyzed By: JH				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	07/07/2022	ND	2.12	106	2.00	1.09	
Toluene*	<0.050	0.050	07/07/2022	ND	2.12	106	2.00	0.702	
Ethylbenzene*	<0.050	0.050	07/07/2022	ND	2.13	106	2.00	1.36	
Total Xylenes*	<0.150	0.150	07/07/2022	ND	6.46	108	6.00	1.27	
Total BTEX	<0.300	0.300	07/07/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 89.3 % 69.9-140

Chloride, SM4500Cl-B			mg/kg		Analyzed By: AC				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	224	16.0	07/08/2022	ND	400	100	400	3.92	

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	07/08/2022	ND	187	93.7	200	28.5	
DRO >C10-C28*	<10.0	10.0	07/08/2022	ND	189	94.6	200	28.8	
EXT DRO >C28-C36	<10.0	10.0	07/08/2022	ND					

Surrogate: 1-Chlorooctane 81.5 % 43-149

Surrogate: 1-Chlorooctadecane 98.4 % 42.5-161

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	07/07/2022	Sampling Date:	07/07/2022
Reported:	07/08/2022	Sampling Type:	Soil
Project Name:	NERVOUS HORZ COM #3H TANK RELEA	Sampling Condition:	Cool & Intact
Project Number:	212C-MD - 02738	Sample Received By:	Shalyn Rodriguez
Project Location:	COP - EDDY CO NM		

**Sample ID: FS - 02 (H222919-02)**

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	07/07/2022	ND	2.12	106	2.00	1.09	
Toluene*	<0.050	0.050	07/07/2022	ND	2.12	106	2.00	0.702	
Ethylbenzene*	<0.050	0.050	07/07/2022	ND	2.13	106	2.00	1.36	
Total Xylenes*	<0.150	0.150	07/07/2022	ND	6.46	108	6.00	1.27	
Total BTEx	<0.300	0.300	07/07/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 87.8 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	640	16.0	07/08/2022	ND	400	100	400	3.92		

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	07/08/2022	ND	187	93.7	200	28.5	
DRO >C10-C28*	<10.0	10.0	07/08/2022	ND	189	94.6	200	28.8	
EXT DRO >C28-C36	<10.0	10.0	07/08/2022	ND					

Surrogate: 1-Chlorooctane 75.1 % 43-149

Surrogate: 1-Chlorooctadecane 90.8 % 42.5-161

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	07/07/2022	Sampling Date:	07/07/2022
Reported:	07/08/2022	Sampling Type:	Soil
Project Name:	NERVOUS HORZ COM #3H TANK RELEA	Sampling Condition:	Cool & Intact
Project Number:	212C-MD - 02738	Sample Received By:	Shalyn Rodriguez
Project Location:	COP - EDDY CO NM		

**Sample ID: NSW - 01 (H222919-03)**

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	07/07/2022	ND	2.12	106	2.00	1.09	
Toluene*	<0.050	0.050	07/07/2022	ND	2.12	106	2.00	0.702	
Ethylbenzene*	<0.050	0.050	07/07/2022	ND	2.13	106	2.00	1.36	
Total Xylenes*	<0.150	0.150	07/07/2022	ND	6.46	108	6.00	1.27	
Total BTEx	<0.300	0.300	07/07/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 87.6 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	720	16.0	07/08/2022	ND	400	100	400	3.92		

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	07/08/2022	ND	187	93.7	200	28.5	
DRO >C10-C28*	<10.0	10.0	07/08/2022	ND	189	94.6	200	28.8	
EXT DRO >C28-C36	<10.0	10.0	07/08/2022	ND					

Surrogate: 1-Chlorooctane 87.7 % 43-149

Surrogate: 1-Chlorooctadecane 102 % 42.5-161

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	07/07/2022	Sampling Date:	07/07/2022
Reported:	07/08/2022	Sampling Type:	Soil
Project Name:	NERVOUS HORZ COM #3H TANK RELEA	Sampling Condition:	Cool & Intact
Project Number:	212C-MD - 02738	Sample Received By:	Shalyn Rodriguez
Project Location:	COP - EDDY CO NM		

**Sample ID: NSW - 02 (H222919-04)**

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	07/07/2022	ND	2.12	106	2.00	1.09	
Toluene*	<0.050	0.050	07/07/2022	ND	2.12	106	2.00	0.702	
Ethylbenzene*	<0.050	0.050	07/07/2022	ND	2.13	106	2.00	1.36	
Total Xylenes*	<0.150	0.150	07/07/2022	ND	6.46	108	6.00	1.27	
Total BTEx	<0.300	0.300	07/07/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 88.2 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	128	16.0	07/08/2022	ND	400	100	400	3.92	

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	07/08/2022	ND	187	93.7	200	28.5	
DRO >C10-C28*	<10.0	10.0	07/08/2022	ND	189	94.6	200	28.8	
EXT DRO >C28-C36	<10.0	10.0	07/08/2022	ND					

Surrogate: 1-Chlorooctane 84.8 % 43-149

Surrogate: 1-Chlorooctadecane 101 % 42.5-161

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	07/07/2022	Sampling Date:	07/07/2022
Reported:	07/08/2022	Sampling Type:	Soil
Project Name:	NERVOUS HORZ COM #3H TANK RELEA	Sampling Condition:	Cool & Intact
Project Number:	212C-MD - 02738	Sample Received By:	Shalyn Rodriguez
Project Location:	COP - EDDY CO NM		

**Sample ID: SSW - 01 (H222919-05)**

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	07/07/2022	ND	2.12	106	2.00	1.09		
Toluene*	<0.050	0.050	07/07/2022	ND	2.12	106	2.00	0.702		
Ethylbenzene*	<0.050	0.050	07/07/2022	ND	2.13	106	2.00	1.36		
Total Xylenes*	<0.150	0.150	07/07/2022	ND	6.46	108	6.00	1.27		
Total BTEx	<0.300	0.300	07/07/2022	ND						

Surrogate: 4-Bromofluorobenzene (PID) 88.2 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	64.0	16.0	07/08/2022	ND	400	100	400	3.92		

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	07/08/2022	ND	187	93.7	200	28.5	
DRO >C10-C28*	<10.0	10.0	07/08/2022	ND	189	94.6	200	28.8	
EXT DRO >C28-C36	<10.0	10.0	07/08/2022	ND					

Surrogate: 1-Chlorooctane 82.7 % 43-149

Surrogate: 1-Chlorooctadecane 98.8 % 42.5-161

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	07/07/2022	Sampling Date:	07/07/2022
Reported:	07/08/2022	Sampling Type:	Soil
Project Name:	NERVOUS HORZ COM #3H TANK RELEA	Sampling Condition:	Cool & Intact
Project Number:	212C-MD - 02738	Sample Received By:	Shalyn Rodriguez
Project Location:	COP - EDDY CO NM		

**Sample ID: SSW - 02 (H222919-06)**

BTX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	07/07/2022	ND	2.12	106	2.00	1.09	
Toluene*	<0.050	0.050	07/07/2022	ND	2.12	106	2.00	0.702	
Ethylbenzene*	<0.050	0.050	07/07/2022	ND	2.13	106	2.00	1.36	
Total Xylenes*	<0.150	0.150	07/07/2022	ND	6.46	108	6.00	1.27	
Total BTX	<0.300	0.300	07/07/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 87.1 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	3800	16.0	07/08/2022	ND	400	100	400	3.92		

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	07/08/2022	ND	187	93.7	200	28.5	
DRO >C10-C28*	<10.0	10.0	07/08/2022	ND	189	94.6	200	28.8	
EXT DRO >C28-C36	<10.0	10.0	07/08/2022	ND					

Surrogate: 1-Chlorooctane 75.2 % 43-149

Surrogate: 1-Chlorooctadecane 90.0 % 42.5-161

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	07/07/2022	Sampling Date:	07/07/2022
Reported:	07/08/2022	Sampling Type:	Soil
Project Name:	NERVOUS HORZ COM #3H TANK RELEA	Sampling Condition:	Cool & Intact
Project Number:	212C-MD - 02738	Sample Received By:	Shalyn Rodriguez
Project Location:	COP - EDDY CO NM		

**Sample ID: ESW - 01 (H222919-07)**

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	07/07/2022	ND	2.12	106	2.00	1.09		
Toluene*	<0.050	0.050	07/07/2022	ND	2.12	106	2.00	0.702		
Ethylbenzene*	<0.050	0.050	07/07/2022	ND	2.13	106	2.00	1.36		
Total Xylenes*	<0.150	0.150	07/07/2022	ND	6.46	108	6.00	1.27		
Total BTEx	<0.300	0.300	07/07/2022	ND						

Surrogate: 4-Bromofluorobenzene (PID) 87.7 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	1440	16.0	07/08/2022	ND	448	112	400	3.64	QM-07	

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	07/08/2022	ND	187	93.7	200	28.5	
DRO >C10-C28*	<10.0	10.0	07/08/2022	ND	189	94.6	200	28.8	
EXT DRO >C28-C36	<10.0	10.0	07/08/2022	ND					

Surrogate: 1-Chlorooctane 78.4 % 43-149

Surrogate: 1-Chlorooctadecane 93.6 % 42.5-161

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	07/07/2022	Sampling Date:	07/07/2022
Reported:	07/08/2022	Sampling Type:	Soil
Project Name:	NERVOUS HORZ COM #3H TANK RELEA	Sampling Condition:	Cool & Intact
Project Number:	212C-MD - 02738	Sample Received By:	Shalyn Rodriguez
Project Location:	COP - EDDY CO NM		

**Sample ID: ESW - 02 (H222919-08)**

BTX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	07/07/2022	ND	2.12	106	2.00	1.09	
Toluene*	<0.050	0.050	07/07/2022	ND	2.12	106	2.00	0.702	
Ethylbenzene*	<0.050	0.050	07/07/2022	ND	2.13	106	2.00	1.36	
Total Xylenes*	<0.150	0.150	07/07/2022	ND	6.46	108	6.00	1.27	
Total BTX	<0.300	0.300	07/07/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 87.9 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	368	16.0	07/08/2022	ND	448	112	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	07/08/2022	ND	187	93.7	200	28.5	
DRO >C10-C28*	<10.0	10.0	07/08/2022	ND	189	94.6	200	28.8	
EXT DRO >C28-C36	<10.0	10.0	07/08/2022	ND					

Surrogate: 1-Chlorooctane 65.9 % 43-149

Surrogate: 1-Chlorooctadecane 57.4 % 42.5-161

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	07/07/2022	Sampling Date:	07/07/2022
Reported:	07/08/2022	Sampling Type:	Soil
Project Name:	NERVOUS HORZ COM #3H TANK RELEA	Sampling Condition:	Cool & Intact
Project Number:	212C-MD - 02738	Sample Received By:	Shalyn Rodriguez
Project Location:	COP - EDDY CO NM		

**Sample ID: WSW - 01 (H222919-09)**

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	07/07/2022	ND	2.12	106	2.00	1.09	
Toluene*	<0.050	0.050	07/07/2022	ND	2.12	106	2.00	0.702	
Ethylbenzene*	<0.050	0.050	07/07/2022	ND	2.13	106	2.00	1.36	
Total Xylenes*	<0.150	0.150	07/07/2022	ND	6.46	108	6.00	1.27	
Total BTEx	<0.300	0.300	07/07/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 87.5 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	320	16.0	07/08/2022	ND	448	112	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	07/08/2022	ND	187	93.7	200	28.5	
DRO >C10-C28*	<10.0	10.0	07/08/2022	ND	189	94.6	200	28.8	
EXT DRO >C28-C36	<10.0	10.0	07/08/2022	ND					

Surrogate: 1-Chlorooctane 80.4 % 43-149

Surrogate: 1-Chlorooctadecane 95.2 % 42.5-161

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	07/07/2022	Sampling Date:	07/07/2022
Reported:	07/08/2022	Sampling Type:	Soil
Project Name:	NERVOUS HORZ COM #3H TANK RELEA	Sampling Condition:	Cool & Intact
Project Number:	212C-MD - 02738	Sample Received By:	Shalyn Rodriguez
Project Location:	COP - EDDY CO NM		

**Sample ID: WSW - 02 (H222919-10)**

BTX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	07/07/2022	ND	2.12	106	2.00	1.09	
Toluene*	<0.050	0.050	07/07/2022	ND	2.12	106	2.00	0.702	
Ethylbenzene*	<0.050	0.050	07/07/2022	ND	2.13	106	2.00	1.36	
Total Xylenes*	<0.150	0.150	07/07/2022	ND	6.46	108	6.00	1.27	
Total BTX	<0.300	0.300	07/07/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 88.1 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	912	16.0	07/08/2022	ND	448	112	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	07/08/2022	ND	187	93.7	200	28.5	
DRO >C10-C28*	<10.0	10.0	07/08/2022	ND	189	94.6	200	28.8	
EXT DRO >C28-C36	<10.0	10.0	07/08/2022	ND					

Surrogate: 1-Chlorooctane 84.8 % 43-149

Surrogate: 1-Chlorooctadecane 98.5 % 42.5-161

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Celey D. Keene, Lab Director/Quality Manager

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### Notes and Definitions

QR-04	The RPD for the BS/BSD was outside of historical limits.
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

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A handwritten signature in black ink, appearing to read "Celey D. Keene".

---

Celey D. Keene, Lab Director/Quality Manager

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page 01 of 01

Company Name: <b>Covero Phillips</b>		<b>BILL TO</b>		<b>ANALYSIS REQUEST</b>	
Project Manager: <b>Christian Hull</b>		P.O. #:			
Address: <b>Christian, Hall @ tetra tech, com</b>		Company: <b>Tetra Tech</b>			
City: <b>State: Zip:</b>		Attn: <b>Christian Hull</b>			
Phone #: <b>Fax #:</b>		Address:			
Project #: <b>212C-MD-00738</b>		City: <b>State: Zip:</b>			
Project Name: <b>Nervous Herz Con #34 Tank Release</b>		Phone #:			
Project Location: <b>Eddy County, NM</b>		Fax #:			
Sample Name: <b>Site 2/6</b>					
FOR LAB USE ONLY					
Lab I.D. <b>Sample I.D.</b>					
<div style="display: flex; justify-content: space-between;"> <div> <b>FS-01</b>  <b>FS-02</b>  <b>NSC-01</b>  <b>NSC-02</b>  <b>SSC-01</b>  <b>SSC-02</b>  <b>ESC-01</b>  <b>ESC-02</b>  <b>WSC-01</b>  <b>WSC-02</b> </div> <div> <b>10</b>  <b>9</b>  <b>8</b>  <b>7</b>  <b>6</b>  <b>5</b>  <b>4</b>  <b>3</b>  <b>2</b>  <b>1</b> </div> </div>		<div style="display: flex; justify-content: space-between;"> <div> <b>(G)RAB OR (C)OMP.</b>  <b># CONTAINERS</b>  <b>GROUNDWATER</b>  <b>WASTEWATER</b>  <b>SOIL</b>  <b>OIL</b>  <b>SLUDGE</b>  <b>OTHER :</b>  <b>ACID/BASE:</b>  <b>ICE / COOL</b>  <b>OTHER :</b> </div> <div> <b>DATE</b>  <b>(TX) TIME</b> </div> </div>		<div style="display: flex; justify-content: space-between;"> <div> <b>TPH</b>  <b>BTEX</b>  <b>Chlorides</b> </div> <div> </div> </div>	
		<div style="display: flex; justify-content: space-between;"> <div> <b>MATRIX</b>  <b>PRESERV.</b>  <b>SAMPLING</b> </div> <div> </div> </div>			

**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  
  
Action 167816

CONDITIONS

Operator: COG OPERATING LLC 600 W Illinois Ave Midland, TX 79701	OGRID: 229137
	Action Number: 167816
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
bhall	Deferral request approved at time of retrofit or plugging and abandonment, which ever comes first. Site will remain in "Closure not approved" status until final remediation completed and closure report submitted.	12/28/2022