Stantec Consulting Services Inc.
11311 Aurora Avenue
Des Moines, IA 50322-7908

June 3, 2025

VIA E-PERMITTING PORTAL

Mr. Michael Buchanan, Environmental Specialist
New Mexico Oil Conservation Division
Energy, Minerals and Natural Resources Department
5200 Oakland Avenue, NE, Suite 100
Albuquerque, NM 87113

RE: 2025 Revised Monitoring Well Installation Work Plan
State Gas Com N#1 Pit Site
El Paso CGP Company
NMOCD Incident Number nAUTOfAB000668

Dear Mr. Buchanan:

On behalf of El Paso CGP Company, LLC (EPCGP), Stantec Consulting Services, Inc. (Stantec) is submitting the enclosed Revised Monitoring Well Installation Work Plan (Work Plan) for the State Gas Com N#1 Pit Site (site). This version of the work plan includes additional information requested by the New Mexico State Land Office, and replaces the version submitted in May 2005.

The enclosed document contains the proposed methodology for the assessment of hydrocarbons in the north and west portions of the site, including installation of three new monitoring wells MW-26, MW-27, and MW-28. Unless otherwise noted, the procedures outlined in this Work Plan are to be completed in accordance with the requirements established in EPCGP's "Remediation Plan for Groundwater Encountered During Pit Closure Activities" document approved by the New Mexico Oil Conservation Division (NMOCD) on November 30, 1995. Pending approval of the Work Plan by the State Land Office (SLO) Environmental Compliance Office (ECO), obtaining an updated SLO water easement, and obtaining New Mexico Office of the State Engineer well permits, the scope of work contained herein is scheduled to begin the week of June 23, 2025.

Please contact Mr. Joseph Wiley of EPCGP at (713) 420-3475, or me, if you have any questions or comments concerning the enclosed Work Plan.

Sincerely,

Stantec Consulting Services Inc.

Steve Varsa
Project Manager
Phone: (515) 251-1020
steve.varsa@stantec.com

cc: Joseph Wiley, EPCGP
Tami Knight, SLO-ECO (Water Easement WM-230)

El Paso CGP Company, LLC
1001 Louisiana
Houston, Texas 77002

STATE GAS COM N#1 PIT SITE
NMOCD Incident Number: nAUTOfAB00668

REVISED MONITORING WELL INSTALLATION WORK PLAN
SAN JUAN RIVER BASIN, NEW MEXICO

JUNE 2025

Prepared by:

Stantec Consulting Services Inc.
11311 Aurora Avenue
Des Moines, Iowa 50322
(515) 253-0830

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ATTACHMENTS

SECTION 1 - INTRODUCTION

This Monitoring Well Installation Work Plan (Work Plan) for the former El Paso CGP Company, LLC (EPCGP) pit groundwater remediation site, located in the San Juan River Basin near Farmington, New Mexico (site) presents the scope of work for the drilling and installation of three new monitoring wells MW-26, MW-27, and MW-28. There are currently twenty-three monitoring wells (MW-1 through MW-6, and MW-9 through MW-25) and three test wells (TW-1 through TW-3) at the site.

The purpose of this Work Plan is to provide the necessary field methods and implementation schedule for the monitoring well drilling and installation activities. Section 2 describes the site and the purpose behind the proposed activities. Section 3 provides details on the field methods to be used. Section 4 presents the anticipated implementation schedule.

SECTION 2 - SCOPE OF WORK

The installation of monitoring wells MW-26, MW-27, and MW-28 is intended to better assess the extent of hydrocarbon impacts at the site. Monitoring wells MW-26 and MW-27 are to be completed to delineate the extent of hydrocarbons west and southwest of MW-20 and MW-21, respectively. Monitoring well MW-28 is intended to delineate the extent of hydrocarbons east of MW-23. The scope of work includes soil boring logging and sampling, monitoring well installation and development, data processing and reporting, and waste management and disposal. Details of the proposed scope of work are provided below.

The proposed monitoring wells, existing monitoring wells, and other features are depicted on Figure 1.

Prior to initiating field activities, the following tasks will be completed:

1) A permit for the installation of monitoring wells MW-26, MW-27 and MW-28 will be obtained from the New Mexico Office of the State Engineer (NMOSE).
2) Utility locates will be made through New Mexico 811 to locate and mark utilities in the vicinity of the three proposed monitoring wells.
3) Notifications will be made to the Environmental Compliance Office of the New Mexico State Land Office (NMSLO), facility operator of Enterprise Products, and the New Mexico Oil Conservation Division (NMOCD) prior to mobilization.

The site is located on State/fee land and is managed by the NMSLO. Water Easement WM-230 has been issued for the activities at the site. The specific activities outlined in this Work Plan are included in Water Easement WM-230 Amendment #4, which is currently being finalized by the NMSLO and EPCGP.

The following information regarding compliance with the New Mexico Cultural Properties Protection (CPP) Rule and compliance with rules concerning working in biologically sensitive areas is provided as required by the NMSLO ECO.

Cultural Properties Protection Compliance Information

Two separate cultural surveys have been completed to cover the areas on which the proposed monitoring wells are to be installed.

Stantec Consulting Services Inc. (Stantec), on behalf of EPCGP, contracted Alpine Archeological Consultants, Inc. (Alpine) to conduct Cultural Survey NMCRIS_153191 for the original 40-acre Water Easement WM-230 area, to meet requirements under NMAC 19.2.24.8. Alpine submitted the completed survey NMCRIS_153191 to the NMSLO Cultural Compliance Portal on July 12, 2023. One archaeological site was identified within the survey area but is not close to the area where work is proposed. Alpine concluded no further archaeological investigations are warranted. A copy of the Cultural Survey NMCRIS_153191 cover sheet is included in Attachment A.

Stantec, on behalf of EPCGP, contracted BARR Engineering Co. (BARR) to conduct Cultural Survey NMCRIS_156190 for the additional 20-acre portion of the Water Easement WM-230 area, to meet requirements under NMAC 19.2.24.8. BARR submitted the completed survey NMCRIS_156190 to the NMSLO Cultural Compliance Portal on September 5, 2024. No cultural material or archaeological sites were identified within the survey area. Barr concluded no further archaeological investigations are warranted. A copy of the Cultural Survey NMCRIS_156190 cover sheet is included in Attachment A.

Biologically Sensitive Area Compliance Information

Two separate biological surveys have been completed to cover the areas on which the proposed monitoring wells are to be installed.

Stantec, on behalf of EPCGP, contracted with Ecosphere Environmental Services (Ecosphere) to conduct a pedestrian field survey of the western 20 acres of the original 40-acre Water Easement WM-230 area on August 4, 2023. According to the SLO, four species of concern have been recorded near the project area—gray vireo (Vireo vicinior), juniper titmouse (Baeolophus ridgwayi), Clover's cactus (Sclerocactus cloverae), and Aztec gilia (Aliciella formosa). The survey conducted on August 4, 2023 found no federal- or state-listed threatened or endangered species were recorded in the project area. No state-listed species of concern were observed in the project area. The survey and results were documented in an August 18, 2023 report subsequently submitted to the SLO Surface Resources Division for review and approval.

Stantec, on behalf of EPCGP, contracted with BARR to conduct a pedestrian field survey of the additional 20 acres of the Water Easement WM-230 area on August 2, 2024. The survey conducted on August 4, 2023 found no suitable habitat for any federally listed threatened, endangered, or candidate species was identified in the project area. One New Mexico state-listed endangered species was recorded during the biological survey—Clover's cactus (Sclerocactus cloverae). The survey and results were documented in an August 20, 2024 report subsequently submitted to the SLO Surface Resources Division for review and approval. A figure depicting the location of the Clover's cactus observed during the August 2, 2024 survey is presented as Attachment B.

Based on the findings of the archeological and biological surveys, no cultural or biological resources will be impacted by the work proposed in this Work Plan.

SECTION 3 - FIELD METHODS

The following subsections describe field procedures to be followed during the site activities. Prior to conducting the soil boring advancement and monitoring well installation activities, approval of this Work Plan will be obtained from the State Land Office (SLO) Environmental Compliance Office (ECO). A revised water easement to include the proposed monitoring wells will be obtained from the SLO prior to field activities. A permit to install the proposed monitoring wells will also be obtained from the New Mexico Office of the State Engineer.

3.1 MONITORING AND SOIL BORING WELL ADVANCEMENT

The location of each proposed monitoring well will be staked by Stantec prior to completing utility clearance through the New Mexico 811 “One Call” system. A Stantec geologist will oversee the utility clearance activities. The final location of the monitoring wells may be adjusted based on the results of the public utility locate activities. Once underground utility locating activities have been completed, hydro-excavation equipment will be used to clear the well locations to a depth of at least 8 feet below ground surface (bgs) prior to advancing drill tooling. The cleared location will be covered with wooden or steel plates and marked “hole” until advancement begins.

Following the completion of utility clearance activities, a rotosonic drill rig will be mobilized and used to advance the wells to the target depths noted on Figure 1. A Stantec geologist will oversee the drilling activities, complete soil sample logging, retain samples for laboratory analysis, and document well construction. Soil sampling will be performed to the termination depth (up to approximately 90 feet bgs) to log and document lithology and determine proper well screen intervals. Borehole logging will include Unified Soil Classification System (USCS) soil descriptions along with a detailed description of each discrete lithologic unit. Soil samples will be collected for field screening at 1-foot intervals from cores recovered at approximately 10-foot intervals. After the sample core is collected, field personnel will field screen using a pre-calibrated photoionization detector (PID) and record the readings. The field screen will be conducted by notching the soil in the core with a hand trowel or other pre-cleaned hand tool, and briefly placing the PID in the notch to measure the PID response.

The field screening data, in addition to visual and olfactory observations (e.g., observing apparent hydrocarbon staining), will aid in identifying sample interval(s) to be retained for potential laboratory analysis (i.e., suspected of having a hydrocarbon impact). At a minimum, one soil sample will be retained from the interval exhibiting the highest field screening reading and/or the interval immediately above the field-interpreted water table. Based on the conditions observed, additional soil samples may be retained for laboratory analysis during advancement of the soil borings. Retained soil samples will be placed in a laboratory-provided 4-ounce glass jar, sealed, labeled, and stored on ice.

After the boring and soil screening are advanced, the retained soil samples will be shipped in an ice-filled cooler under standard chain-of-custody protocol to Eurofins Environment Testing Southeast, LLC, in Pensacola, Florida. Samples not retained and submitted for laboratory analysis will be disposed with the soil cuttings. The submitted soil samples will be analyzed for the presence of benzene, toluene, ethylbenzene, and total xylenes (BTEX) by United States Environmental Protection Agency (EPA) Method SW846 8260B, gasoline-range organics, diesel-range organics, and oil-range organics by EPA Method 8015 M, and chlorides by EPA Method 300.

3.2 MONITORING WELL INSTALLATION

The planned total depth of each proposed monitoring well is 90 feet bgs. The monitoring wells will be constructed with 25 feet of 2-inch-diameter, Schedule 40, 0.010-slot PVC screen and 2-inch-diameter, Schedule 40 PVC riser casing. The proposed screened depth is intended to intersect the water table with 15 feet of screen submerged and 10 feet of screen above the water table. The annular space adjacent to the well screen will be filled with 10-20 silica sand from the bottom of the borehole to 2 feet above the top of the screen. Three (3) feet of hydrated bentonite chips will be placed above the silica sand to prevent downward migration of surface water. Bentonite grout will be placed above the bentonite chips to 1 foot bgs.

To complete the wells, a locking, protective steel stick-up well casing will be installed within a concrete pad on the ground surface from approximately 3 feet above ground surface to 2 feet bgs. A water-tight gripper plug will be placed on the top of the monitoring well riser. Three protective bollards will be installed around the well completion. Following installation, the well completion and protective bollards will be painted safety-yellow, and the well identifier stenciled on the stick-up completion. The newly installed well will be secured with a zip-tie. Well tags will also be prepared and installed on each stick-up completion pursuant to SLO water easement requirements.

Well development will be performed using well swab surging and pumping until sediment has been removed and visibly clear water is observed or the well runs dry. Decontamination and development water will be placed in a poly-tank.

Assuming free-phase petroleum hydrocarbons are not encountered; following development, HydraSleeve™ no-purge groundwater samplers and tethers will be placed in the new monitoring wells. The samplers will be placed at least 5 feet below the field-apparent water table.

The top-of-casing and ground surface elevation and location of the newly installed monitoring wells will be surveyed-in by a New Mexico-licensed surveyor. The surveyor will also update the site plan with the location of identified utilities not included in previous surveys.

3.3 GENERAL PROTOCOLS

This subsection presents a discussion of health and safety, documentation procedures, buried piping or utility identification, waste handling, and other procedures to be performed as part of the investigation.

3.3.1 Health and Safety

A Site-Specific Health and Safety Plan (HASP) will be prepared for groundwater monitoring, operations, maintenance, and drilling activities. The HASP will include guidance on the personal protective equipment (PPE) necessary for field activities, identified hazards associated with the field activities, and directions to the nearest medical facility. Flame-resistant clothing and Level D protective equipment will be worn, as required. A copy of the HASP will be on site at all times while work is being performed. The HASP will apply to Stantec employees, Stantec's subcontractors, and visitors at the site.

3.3.2 Documentation Procedures

Data generated during the field investigation will be recorded on a boring and well construction log. The boring log will include USCS descriptions, detailed lithologic descriptions, PID readings, length/percent recovery, sample collection intervals, and drilling method employed. The well construction log will include screen, sand pack, wellbore seal, and surface completion details.

The field geologist will maintain a field logbook. At the end of each day of field activities, the notes will be dated and signed by the field geologist.

The daily field logbook will contain information such as:

- Date
- Name, location, and objective of the work activities
- Weather conditions
- Equipment calibration information
- Personnel and visitors on site
- Photograph numbers and descriptions (if applicable)
- Description of decontamination activities (if applicable)
- Any deviations from the Work Plan
- Other relevant observations as the fieldwork progresses
- Sample collection intervals and times
- Problems and corrective actions

3.3.3 Well Location and Utility Identification

Prior to any drilling or excavation, a call will be made to the New Mexico 811 “One Call” to verify utility clearance and to notify the operator. “One Call” will be notified that the monitoring well location is staked or flagged and that the entire area surrounding the drilling location should be marked. The clearance call must be made at least two working days prior to drilling, and site work must be completed within 14 days of the clearance. In addition, access will be coordinated with the current operator of the site prior to any drilling activities to allow location of any underground infrastructure and to comply with operator safety guidance.

The SLO-ECO will also be notified of the dates of field activities at least 48 hours prior to start.

3.3.4 Equipment Decontamination

Prior to drilling, down-hole equipment will be steam cleaned or scrubbed with a non-phosphate detergent (e.g., Liquinox®). Where feasible, equipment to be decontaminated will be disassembled to permit adequate cleaning of the internal portions of the equipment. Equipment to be steam cleaned will be placed into a self-contained decontamination trailer with metal cleaning racks that support the equipment for cleaning, rinsing, and air drying. Heavy waterproof gloves will be worn during steam cleaning to protect against skin contact with steam and potential contaminants and to reduce the potential for cross-contamination between samples.

3.3.5 Investigation-Derived Waste

The hydro-excavated spoils generated will be transported to the Envirotech, Inc. Land Farm located near Bloomfield, New Mexico (land farm) for disposal. Investigation-derived soil waste will be containerized in a roll-off staged at the site. The driller will have a front-end loader or equivalent equipment on site to load soil cuttings as they are generated. Stantec will coordinate the removal and transport of the roll-off from the site to the land farm for disposal.

A 55-gallon drum or 330-gallon tote will be used to store well development and decontamination water. An additional tote will be used to store clean water for decontamination activities, if necessary. The drums and totes will be staged on the ground in the work area. Following completion of the project, the wastewater will be transported to the Agua Moss, Inc. facility near Bloomfield, New Mexico for disposal by injection.

Other investigation-derived wastes (i.e., excess well materials, bags, buckets, gloves) will be removed from the site by the driller for disposal as general construction/demolition debris.

3.3.6 Field Equipment Calibration Procedures

Regarding organic vapor meters, field personnel will use a 10.6 electron volt (eV) PID for screening soil samples during advancement of soil borings. This instrument will be calibrated prior to use according to the manufacturer's specifications. The instrument calibration will be checked at the beginning of each day of use and any time meter drift is suspected. Calibration information will be recorded in the field logbook.

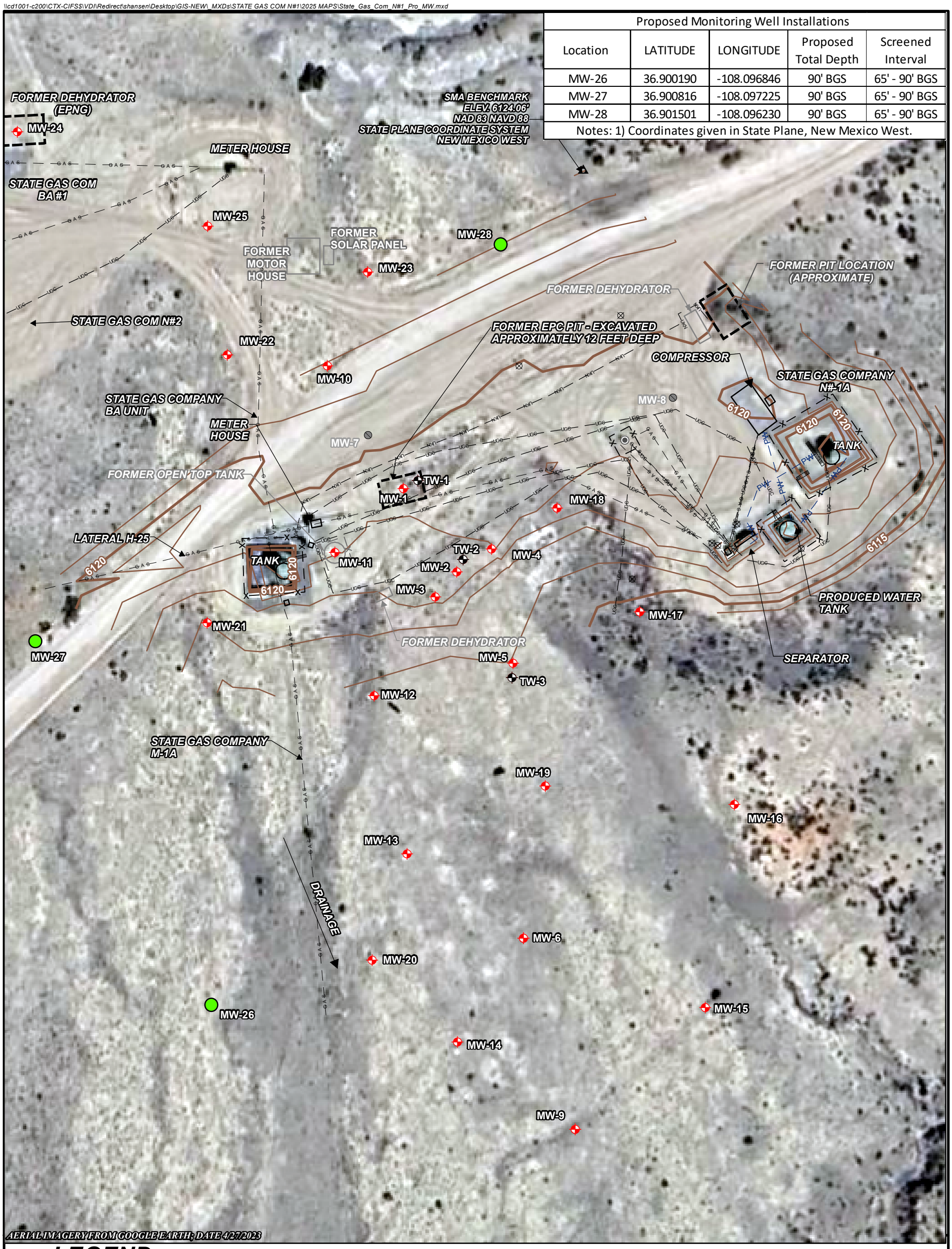
SECTION 4 - SCHEDULE

It is anticipated the activities herein will commence the week of June 23, 2025. Utility locates must be verified prior to the work. Soil and groundwater analytical results and recommendations from the field activities will be provided in the 2025 Annual Report, anticipated to be submitted by April 1, 2026.

FIGURE

\\cd1001-c200\CTX-CIFS$\VDI\Redirect\shansen\Desktop\GIS-NEW_MXDs\STATE GAS COM N#1\2025 MAPS\State_Gas_Com_N#1_Pro_MW.mxd

Proposed Monitoring Well Installations				
Location	LATITUDE	LONGITUDE	Proposed Total Depth	Screened Interval
MW-26	36.900190	-108.096846	90' BGS	65' - 90' BGS
MW-27	36.900816	-108.097225	90' BGS	65' - 90' BGS
MW-28	36.901501	-108.096230	90' BGS	65' - 90' BGS
Notes: 1) Coordinates given in State Plane, New Mexico West.				



LEGEND:

- 6120 — APPROXIMATE GROUND SURFACE CONTOUR AND ELEVATION, FEET
- FENCE
- NATURAL GAS LINE
- PRODUCED WATER LINE
- UNKNOWN LINE
- UNDERGROUND CABLE
- ABANDONED MONITORING WELL
- RIG ANCHOR
- SMA BENCHMARK
- WELLHEAD
- TEST WELL
- MONITORING WELL

PROPOSED SITE FEATURES

- MONITORING WELL LOCATION

SCALE IN FEET

0 60 120

N

REVISION	DATE	DESIGN BY	DRAWN BY	REVIEWED BY
	2025-04-14	SAH	SAH	SV

TITLE:

PROPOSED MONITORING WELL LOCATIONS

PROJECT:

STATE GAS COM N#1
SAN JUAN RIVER BASIN
SAN JUAN COUNTY, NEW MEXICO

Stantec

Figure No.: 1

ATTACHMENT A

Stephanie Garcia Richard, Commissioner of Public Lands
State of New Mexico

NMSLO Cultural Resources Cover Sheet Exhibit

NMCRIS Activity Number: 153191
(if applicable)

Exhibit Type (select one)

○ **ARMS Inspection/Review** - Summarize the results (select one):

☐ (A) The entire area of potential effect or project area has been previously surveyed to current standards and **no cultural properties** were found within the survey area.

☐ (B) The entire area of potential effect or project area has been previously surveyed to current standards and **cultural properties were found** within the survey area.

☑ (C) The entire area of potential effect or project area has **not** been previously surveyed or **has not been surveyed** to current standards. A complete archaeological survey will be conducted and submitted for review.

◉ **Archaeological Survey**

Findings:

☐ **Negative** - No further archaeological review is required.

☑ **Positive** - Have avoidance and protection measures been devised? Select one: Yes

Comments: The only site in the lease parcel is site LA51509, which is roughly 250 m southeast of the work area and on the opposite side of a large arroyo. The site will be entirely avoided by project activities.

Project Details:

NMSLO Lease Number (if available): WM002300000

Cultural Resources Consultant: Alpine Archaeological Consultants, Inc.

Project Proponent (Applicant): El Paso CGP Company, LLC

Project Title/Description: State Gas Com #1 Pit Site

Project Location:

County(ies): San Juan County

PLSS/Section/Township/Range): T31N R12W S16

For NMSLO Agency Use Only:

NMSLO Lease Number: Acknowledgment-Only: ☐

Lease Analyst:

Date Exhibit Routed to Cultural Resources Office:

No person may alter the wording of the questions or layout of the cover sheet. The completion of this cover sheet by itself does not authorize anyone to engage in new surface disturbing activity before the review and approvals required by the Cultural Properties Protections Rule.

Form Revised 12 22

Stephanie Garcia Richard, Commissioner of Public Lands
State of New Mexico

NMSLO Cultural Resources Cover Sheet Exhibit

NMCRIS Activity Number: 156190
(if applicable)

Exhibit Type (select one)

○ **ARMS Inspection/Review** - Summarize the results (select one):

☐ (A) The entire area of potential effect or project area has been previously surveyed to current standards and **no cultural properties** were found within the survey area.

☐ (B) The entire area of potential effect or project area has been previously surveyed to current standards and **cultural properties were found** within the survey area.

☐ (C) The entire area of potential effect or project area has **not** been previously surveyed or **has not been surveyed** to current standards. A complete archaeological survey will be conducted and submitted for review.

◉ **Archaeological Survey**

Findings:

☑ **Negative** - No further archaeological review is required.

☐ **Positive** - Have avoidance and protection measures been devised? Select one: ☐

Comments: Because of ongoing oil field activities and construction as well as various forms of bioturbation, any cultural resources that may have been present at one time have likely been relocated or destroyed.

Project Details:

NMSLO Lease Number (if available): B113700059

Cultural Resources Consultant: Barr Engineering Co.

Project Proponent (Applicant): Stantec

Project Title/Description: Cultural Resource Inventory for State Gas Com N#1 Pit Site Easement Expansion in San Juan County, New Mexico

Project Location:

County(ies): San Juan County

PLSS/Section/Township/Range): T13N, R12W, Section 16

For NMSLO Agency Use Only:

NMSLO Lease Number: _____ Acknowledgment-Only: ☐

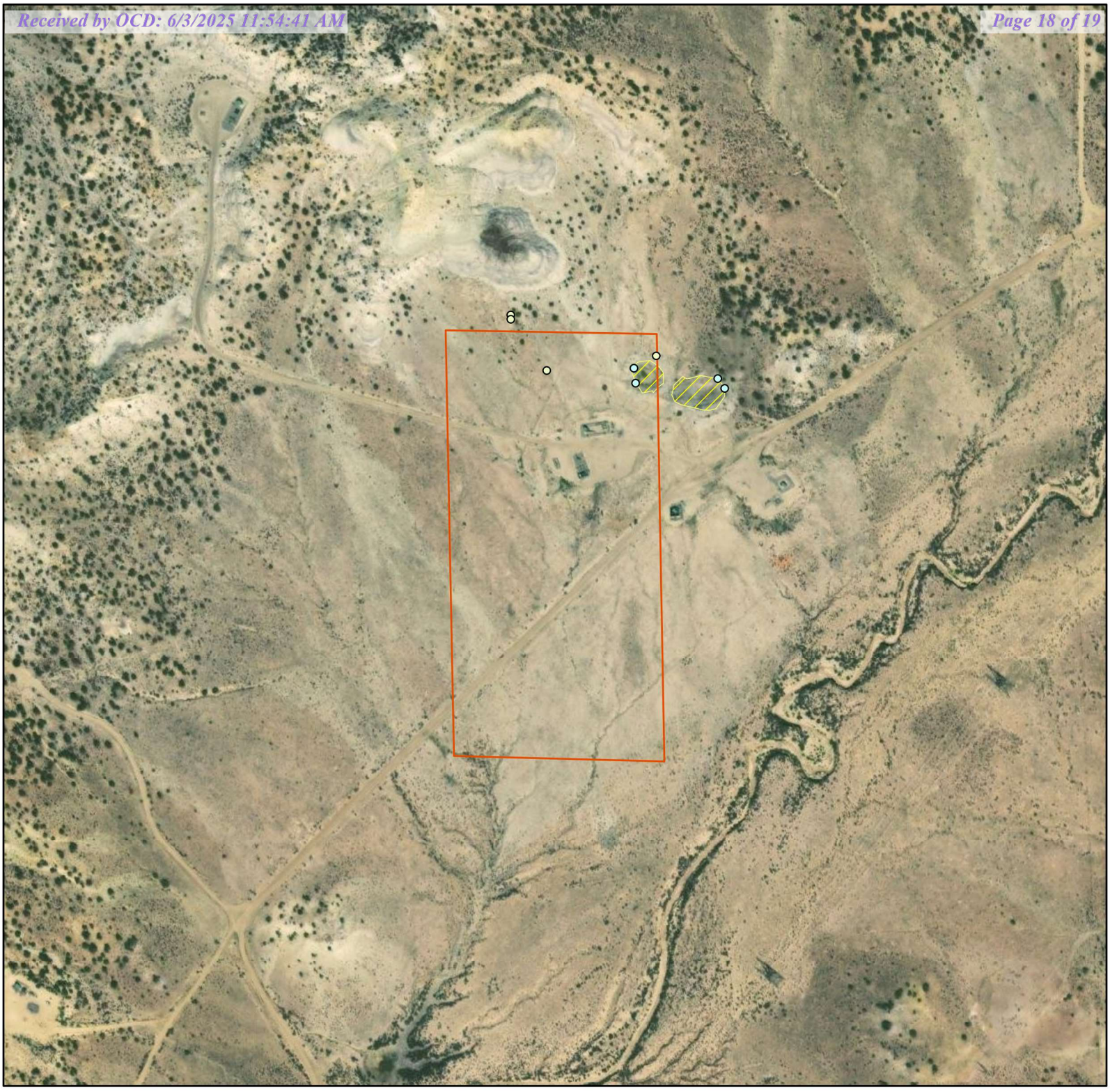
Lease Analyst: _____

Date Exhibit Routed to Cultural Resources Office: _____

No person may alter the wording of the questions or layout of the cover sheet. The completion of this cover sheet by itself does not authorize anyone to engage in new surface disturbing activity before the review and approvals required by the Cultural Properties Protections Rule.

Form Revised 12 22

ATTACHMENT B



AREA OF DETAIL

0 80 Miles

Legend

Species
- Russian knapweed (Acroptilon repens)
- Cheatgrass (Bromus tectorum)
- Halogeton (Halogeton glomeratus)
- Saltcedar (Tamarix spp.)

NoxWeeds_Polygon

Species
- Clover's Cactus (Sclerocactus cloverae)
- <all other values>

Survey_Area

Scale: 1:5,000

0 0.05 0.1 0.2 Kilometers

Date: 8/20/2024
Drawn By: LJH2
Coordinate System:
NAD 1983 UTM Zone 12N

Stantec Environmental Services
State Gas Com #1N

Map 2 - Biological Survey Results

T13N, R12W, Section 16
USGS 7.5' Quadrangle:
Adobe Downs Ranch, CO NM 36108-H1, 1995
San Juan County, New Mexico

BARR

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
https://www.emnrd.nm.gov/ocd/contact-us

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

CONDITIONS

Operator: El Paso Natural Gas Company, L.L.C 1001 Louisiana Street Houston, TX 77002	OGRID: 7046
	Action Number: 470280
	Action Type: [UF-GWA] Ground Water Abatement (GROUND WATER ABATEMENT)

CONDITIONS

Created By	Condition	Condition Date
jburdine	Revised MW installation work plan accepted for the record. Note that OCD may require more monitoring wells if these proposed wells do not give full delineation of the site. Send in a complete report of the field activities for this MW installation work plan and the quarterly sampling for these wells by September 1, 2025.	6/10/2025