



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

September 23, 2025

VIA E-PERMITTING PORTAL

Ms. Ashley Maxwell, Environmental Specialist
New Mexico Oil Conservation Division
Energy, Minerals and Natural Resources Department
1000 Rio Brazos Road
Aztec, New Mexico 87410

RE: Well Installation and Soil Vapor Extraction Testing Activities Work Plan
State Gas Com N#1 Pit Site
El Paso CGP Company, LLC
NMOCD Incident Number nAUTOfAB000668

Dear Ms. Maxwell:

On behalf of El Paso CGP Company, LLC (EPCGP), Stantec Consulting Services Inc. (Stantec) is submitting the enclosed Well Installation and Soil Vapor Extraction Testing Activities Work Plan (Work Plan) for the State Gas Com N#1 Pit Site (site). The enclosed document contains the proposed methodology for the installation of two soil vapor extraction (SVE) wells and three monitoring wells, and conducting SVE testing on selected wells at the site. 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 amendment, and obtaining New Mexico Office of the State Engineer well permits, the scope of work contained herein is scheduled to begin the week of October 27, 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.

A handwritten signature in blue ink, appearing to read "Stephen Varsa".

Stephen 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: nAUTOAB000668
WELL INSTALLATION AND SOIL VAPOR EXTRACTION TESTING ACTIVITIES
WORK PLAN
SAN JUAN RIVER BASIN, NEW MEXICO**

SEPTEMBER 2025

Prepared by:

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

WELL INSTALLATION ACTIVITIES WORK PLAN
STATE GAS COM N#1 PIT SITE – SAN JUAN RIVER BASIN, NEW MEXICO

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Figure 1 – Proposed Well Locations

Figure 2 – Typical Soil Vapor Extraction Testing Schematic

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Attachment A – Cultural Survey Cover Sheets

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WELL INSTALLATION AND SOIL VAPOR EXTRACTION TESTING ACTIVITIES WORK PLAN
STATE GAS COM N#1 PIT SITE – SAN JUAN RIVER BASIN, NEW MEXICO

SECTION 1 - INTRODUCTION

This Well Installation and Soil Vapor Extraction (SVE) Testing Activities Work Plan (Work Plan) for the former El Paso CGP Company, LLC (EPCGP) State Gas Com N#1 pit groundwater remediation site, located in the San Juan River Basin near Aztec, New Mexico (site) presents the scope of work for the drilling and installation of three monitoring wells (MW-29, MW-30, and MW-31) and two SVE test wells (SVE-1 and SVE-2). SVE testing will also be conducted from the two newly installed monitoring wells and selected monitoring wells. There are currently twenty-six monitoring wells (MW-1 through MW-6, and MW-9 through MW-28) and three test wells (TW-1 through TW-3) at the site.

The purpose of this Work Plan is to provide the field methods and implementation schedule for the proposed 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.

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SECTION 2 - SCOPE OF WORK

Previous activities at the site have delineated a majority of the extent of hydrocarbons present. The installation of monitoring wells MW-29, MW-30, and MW-31 is intended to better assess the extent of hydrocarbon impacts to the northwest and east at the site, and the installation of test wells SVE-1 and SVE-2 is to allow for collection of design criteria to better plan and design an SVE system to remediate hydrocarbons. Monitoring wells MW-29 and MW-30 are to be completed to delineate the extent of hydrocarbons east of MW-28 and MW-1. Monitoring well MW-31 is intended to delineate the extent of hydrocarbons west of MW-22. The two SVE test wells (SVE-1 and SVE-2) will be located near MW-1, MW-2, and MW-3, where light non-aqueous phase liquid (LNAPL) has been detected. The scope of work includes soil boring logging and sampling, well installation and development, data processing and reporting, and waste management and disposal. SVE flow and vacuum influence data will be collected during SVE testing of the two SVE test wells and monitoring wells MW-4 and MW-10.

The newly installed monitoring wells will be sampled during future groundwater monitoring events to help confirm the extent of hydrocarbons. Depending on the results of the SVE testing, the newly installed SVE wells will be incorporated into a future SVE system. Details of the proposed scope of work are provided below. The proposed wells, existing monitoring wells, and other features are depicted on Figure 1.

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

- 1) An amendment to the existing Water Easement (WM-230) for the site will be obtained from the New Mexico State Land Office (SLO).
- 2) A permit for the installation of monitoring wells MW-29, MW-30, and MW-31, and test wells SVE-1 and SVE-2, will be obtained from the New Mexico Office of the State Engineer (NMOSE).
- 3) Utility locates will be made through New Mexico 811 to locate and mark utilities in the vicinity of the three proposed monitoring wells and two test wells.
- 4) Notifications will be made to the Environmental Compliance Office of the New Mexico State Land Office (SLO-ECO), facility operator Hilcorp Energy, and the New Mexico Oil Conservation Division (NMOCD), prior to mobilization.

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 below, as required by the SLO-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 New Mexico Cultural Resource Information System (NMCRIS)_153191 for the original 40-acre Water Easement WM-230 area, to meet

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STATE GAS COM N#1 PIT SITE – SAN JUAN RIVER BASIN, NEW MEXICO

requirements under New Mexico Administrative Code (NMAC) 19.2.24.8. Alpine submitted the completed Cultural Survey NMCRIS_153191 to the SLO 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 were 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 SLO 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 were 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 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.

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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 well installation activities, approval of this Work Plan will be obtained from the SLO-ECO.

3.1 SOIL BORING ADVANCEMENT

The location of each proposed 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 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 track-mounted rotosonic drill rig will be mobilized and used to advance soil borings up to 90 feet bgs at the proposed monitoring well and SVE test well locations depicted on Figure 1. A Stantec geologist will oversee the drilling activities.

For the monitoring wells, borehole logging will include Unified Soil Classification System (USCS) soil descriptions for the entire depth of the boring, along with a detailed description of each discrete lithologic unit. Soil samples will be collected for field screening and potential laboratory analysis at 1-foot intervals, where possible from the rotosonic continuous-core sampler. When the sample core is collected, Stantec field personnel will field screen it using a pre-calibrated photoionization detector (PID) and record the readings. The field screening 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 impacts. The screening, in addition to visual and olfactory observations (e.g., observing apparent hydrocarbon staining), will aid in identifying whether a portion of the sample interval should be retained for potential laboratory analysis (i.e., suspected of having a hydrocarbon impact).

Soil samples retained for potential laboratory analysis will be placed in laboratory provided 4-ounce glass jars, sealed, labeled, and stored on ice. After the boring and soil screening are completed, one soil sample per boring, associated with the highest PID reading above the field-interpreted and/or gauged water table, will be shipped in an ice-filled cooler under standard chain-of-custody protocol to Eurofins Environment Testing Southeast, LLC in Pensacola, Florida. Additional soil samples may be retained for laboratory analysis at the termination of each soil boring if groundwater is not encountered, or to better characterize the distribution of hydrocarbons in the vadose zone. Samples not retained for analysis will be disposed of 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 8026; gasoline-range organics (GRO), diesel-range organics (DRO), and oil-range organics (ORO) by EPA Method 8015 M, and chlorides by EPA Method 300.

For the SVE wells, soil sampling will be completed beginning at a depth of 30 feet bgs to the termination of the boring to log and document lithology, and to conduct field screening at 1-foot intervals, in or near the screened intervals. Soil sampling and field screening methods will be the same as those used during advancement of the monitoring wells. Based on the results of soil

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sampling previously conducted during advancement of nearby soil boring SB-1 and test well TW-1, no soil samples will be retained for laboratory analysis during advancement of SVE test well SVE-1. For location SVE-2, at least one soil sample will be retained from the interval exhibiting the highest PID reading for laboratory analysis of BTEX, GRO, DRO, ORO, and chlorides.

3.2 MONITORING WELL INSTALLATION

Monitoring wells MW-29, MW-30, and MW-31 will be constructed of 2-inch-diameter, Schedule 40, 0.010-slot polyvinyl chloride (PVC) screen and 2-inch-diameter, Schedule 40 PVC riser casing. A 25-foot screen will be installed to the depths described in Figure 2, which are anticipated to intersect the groundwater surface and provide sufficient water column for sample collection. The riser casing will extend from the top of the screen to approximately 2.5 feet above the ground surface for stick-up wells MW-29 and MW-31, and to approximately 6 inches bgs for flush-mount well MW-30. 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 6 inches below the bottom of the protective well casing for MW-29 and MW-31, and below the bottom of flush-mount well vault for MW-30.

For monitoring wells MW-29 and MW-31, a locking, protective steel stick-up well casing will be installed within a concrete pad on the ground surface from 3 feet above ground surface to 2 feet bgs. Silica sand will be placed from 6 inches below the bottom of the protective well casing (approximately 2.5 feet bgs) to within approximately 1 foot of the ground surface, or to a field-determined depth based on concrete pad placement. Three steel bollards will be placed around the concrete pads to protect the well protective casings. Once installed, the bollards and stick-up completions will be painted in safety yellow and the well identifier stenciled on the stick-up completion. Monitoring well MW-30, which will be located on the south edge of the traveled portion of Road 1980 (dirt road that runs through the site) will be installed as a flush-mount well using a traffic-rated steel well vault installed in concrete. The concrete pad will be at least 3 feet in diameter and 8 inches thick, formed to be at grade with the surrounding ground surface. Well tags will be prepared and installed on each monitoring well pursuant to SLO water easement requirements.

Down-hole tooling used for installing the wells will be decontaminated before advancing each monitoring well. Monitoring 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. Assuming LNAPL is not encountered in the monitoring wells, 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.

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3.3 SVE TEST WELL INSTALLATION

Each SVE well will be constructed to a depth of up to 70 feet bgs, with 30 feet of 4-inch-diameter, Schedule 40, 0.01-slot PVC screen. The annular space adjacent to the SVE well screen will be filled with 20-40 silica sand from the bottom of the borehole to 1 foot above the top of the screen. Five (5) feet of bentonite chips will be placed above the silica sand and hydrated to provide a seal prior to placing the grout. Bentonite grout will be placed above the bentonite chips to approximately 3 feet bgs. The remaining portion of the SVE well annular space will be filled with sand or native soil to the surface to facilitate exposure and connection to conveyance piping at a later date. The well casing for each SVE well will be finished approximately 0.5 feet bgs and capped with a compression plug. Similar to the proposed monitoring wells, a locking, protective steel stick-up well casing will be installed within a concrete pad, and concrete-filled steel bollards placed around each well completion for protection. Well tags will also be prepared and installed on each SVE well pursuant to SLO water easement requirements.

Decontamination of down-hole equipment will be conducted in the same manner as the monitoring well installation activities. No well development will be conducted on the SVE test wells, and no sampling devices will be deployed in these wells. The locations of the SVE test wells will also be surveyed in by a New Mexico-licensed surveyor.

3.4 SVE TESTING ACTIVITIES

SVE feasibility testing is to be completed from the two SVE test wells and from monitoring wells MW-4 and MW-10. The SVE test wells and monitoring wells each have sufficient well screen above the water table to facilitate SVE testing, and are located in areas where hydrocarbon remediation is planned. Multiple wells are being tested to evaluate variability in induced vacuum, air flow, hydrocarbon concentration, and vacuum influence potentially due to variable soil types at or above groundwater across the site, and to collect additional data to facilitate SVE system design. These activities build on the SVE testing completed on other site monitoring wells (MW-3 and MW-11 in 2018, and MW-2, MW-5, MW-6, and MW-16 in 2021). A site plan is included as Figure 1.

Stantec will retain the services of AcuVac Remediation (Acuvac) to mobilize and provide equipment and personnel to complete SVE testing activities. Acuvac's SVE unit includes an internal combustion engine (ICE) which reduces emissions over 99%, and therefore the New Mexico Environment Department has confirmed short-term SVE activities do not trigger air emission concerns. Acuvac's SVE unit consists of a Roots® 22 blower capable of a vacuum of 15 inches of mercury at 60 cubic feet per minute. Testing manifolds equipped with vacuum gauges and flow measuring and sampling ports will be utilized, and Acuvac will provide the metering equipment (i.e., organic vapor analyzer, flow meters, magnehelic gauges) needed to complete the testing. Stantec will also have field staff present to oversee site activities, complete health and safety monitoring, and assist with data collection.

The SVE test on each well will be conducted for approximately 4 hours, with vacuum pressure incrementally increased during the test. Extraction well flow rates, vacuum pressures, and off-gas hydrocarbon concentration data will be collected to evaluate potential emissions. Influent vapor samples will be collected using Tedlar® bags from each SVE test well prior to completion to aid in evaluating potential emissions for a full-scale SVE system. In conjunction with the influent vapor

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samples, additional Tedlar® bag samples will be collected at the SVE unit during the testing completed on the SVE wells, after the ICE, to document its treatment efficiency. The Tedlar® bag samples will be submitted to Eurofins Environment Testing South Central, LLC in Albuquerque, New Mexico, for analysis of volatile organic compounds using Method TO-3, and total petroleum hydrocarbons using Method TO-15. Vacuum influence data will also be collected from nearby monitoring wells to evaluate influence from each extraction well. No liquid waste requiring management is expected to be generated during completion of the SVE testing activities.

The data, results, and conclusions of the SVE testing will be summarized as an attachment to be included with the annual groundwater monitoring report for the site. The attachment will include a narrative of the activities completed, a tabulated summary of the data collected, estimated hydrocarbon recovery rates and totals, laboratory analytical reports, waste disposal documentation, and other pertinent information.

3.5 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 proposed scope of work.

3.5.1 Health and Safety

A Site-Specific Health and Safety Plan (HASP) will be prepared for drilling, groundwater monitoring and sampling, SVE testing operations, and maintenance 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.

3.5.2 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)

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STATE GAS COM N#1 PIT SITE – SAN JUAN RIVER BASIN, NEW MEXICO

- Any deviations from the Work Plan
- Other relevant observations as the fieldwork progresses
- Sample collection intervals and times
- Problems and corrective actions

SVE testing-specific field sheets will be utilized to record data during completion of the SVE tests.

3.5.3 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 15 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.

3.5.4 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.

3.5.5 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 lined 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.

If significant water is encountered during drilling, a 55-gallon drum or 330-gallon tote will be used to store well development and decontamination water. If minimal to no water is encountered, any recovered water will be added to the roll-off containing soil cuttings. 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 drummed or toted 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.

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3.5.6 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.

WELL INSTALLATION AND SOIL VAPOR EXTRACTION TESTING ACTIVITIES WORK PLAN
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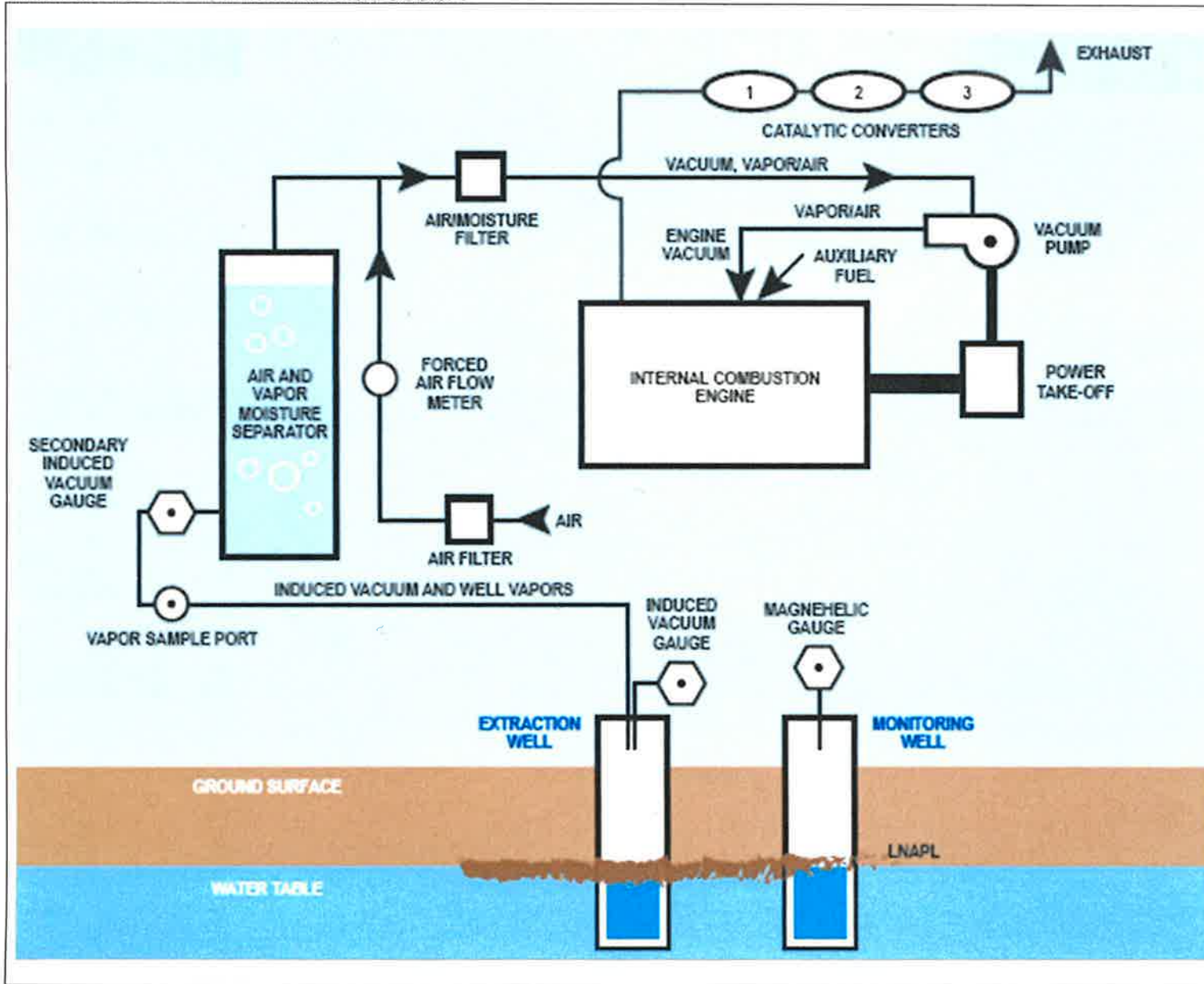
SECTION 4 - SCHEDULE

Pending receipt of permits and an approved water easement amendment, it is anticipated the activities herein will commence as soon as the week of October 17, 2025. Utility locates must be verified prior to the work.

Soil and groundwater analytical results, SVE testing activities results, and associated recommendations will be provided in the 2025 Annual Report, anticipated to be submitted by April 1, 2026.

FIGURES

\\STANTEC\COMPS\FY 2025\SanJuanRiverBasin\Drawings\GAS COM\N1\2025 MAPS\State Gas Com_N1_Fig_2025_02.dwg



LEGEND:

TITLE:	TYPICAL SOIL VAPOR EXTRACTION TESTING SCHEMATIC			
PROJECT:	STATE GAS COM N#1 SAN JUAN RIVER BASIN SAN JUAN COUNTY, NEW MEXICO			
	Stantec	Figure No.	2	

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.

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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:

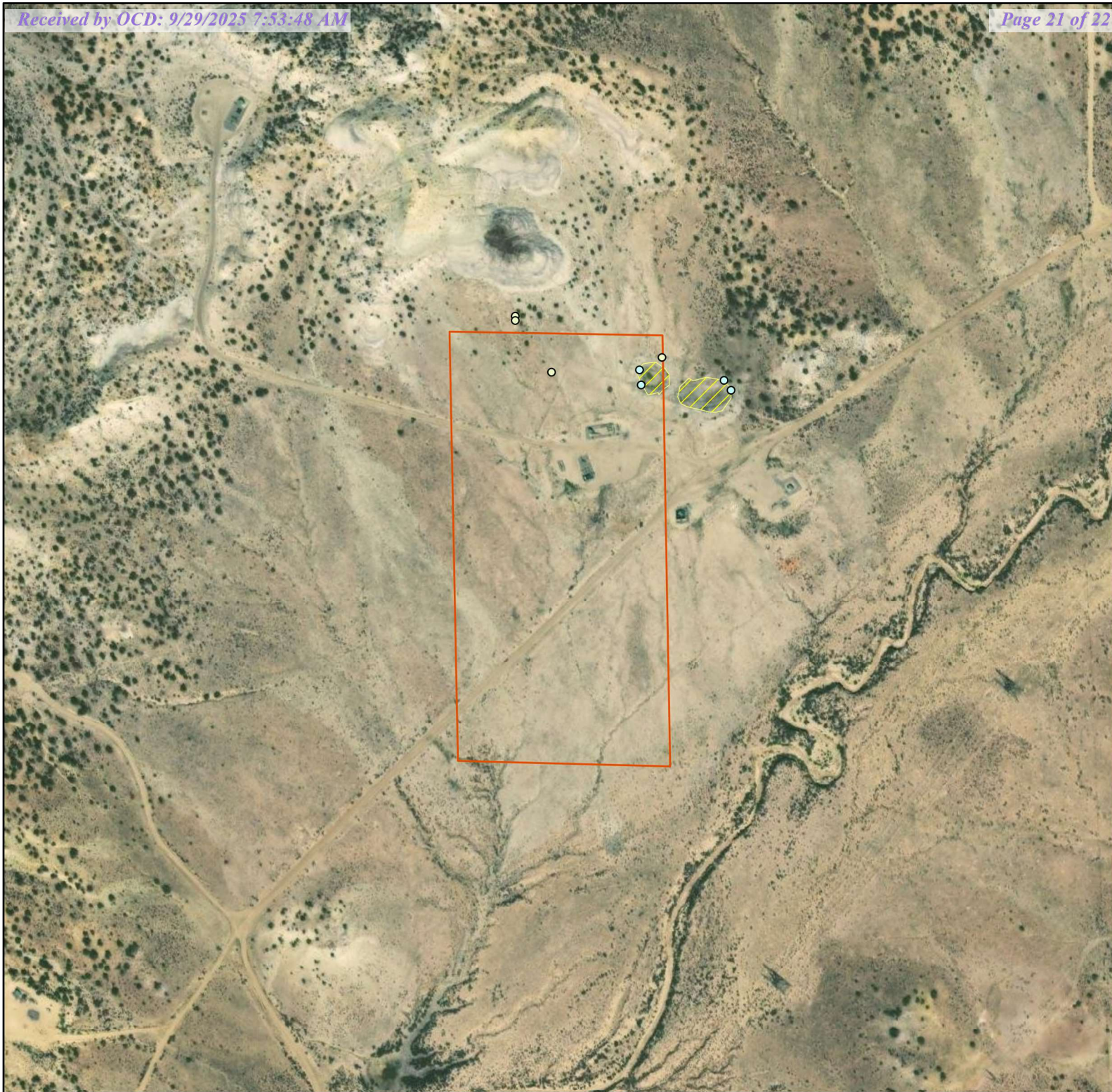
Date Exhibit Routed to Cultural Resources Office:

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****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 80
MilesDate: 8/20/2024
Drawn By: L.J.H2
Coordinate System:
NAD 1983 UTM Zone 12N0 0.05 0.1 0.2
Kilometers**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/oed/contact-us>

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

CONDITIONS

Action 509993

CONDITIONS

Operator: El Paso Natural Gas Company, L.L.C 1001 Louisiana Street Houston, TX 77002	OGRID: 7046
	Action Number: 509993
	Action Type: [UF-GWA] Ground Water Abatement (GROUND WATER ABATEMENT)

CONDITIONS

Created By	Condition	Condition Date
shanna.smith	OCD records indicate that an approved Stage 1/2 plan is not on file. Pursuant to 19.15.30 NMAC, El Paso CGP Company, LLC (El Paso) must submit a Stage 1/2 Abatement plan no later than February 9, 2026, that meets all of the requirements of 19.15.30.13 NMAC.	11/10/2025
shanna.smith	Alternatively, if a Stage 1/Stage 2 Abatement Report has been approved by OCD, provide a copy of Stage 1/ Stage 2 Abatement Report by November 28, 2025, so OCD can update our Online records.	11/10/2025
shanna.smith	OCD Records indicate there has been two prior reports submitted discussing SVE testing. Reports from June 2017 Air Sparge and SVE Feasibility Test Work Plan and on August 23, 2021, Work Plan for SVE Testing Activities discussing SVE testing. Clarify the SVE testing activities set forth in this Well Installation and Soil Vapor Extraction Testing Activities report September 2025.	11/10/2025
shanna.smith	Approved Stage 1/2 Abatement Activities will be conducted and submitted as a report by February 9, 2026. The report must include drilling activities and laboratory analysis of soil and groundwater samples. In the event that the release site was not fully delineated the report must also include the location of proposed additional delineation monitor wells and a schedule for additional delineation.	11/10/2025
shanna.smith	Soil samples will be sampled at a minimum pursuant to 19.15.29.11 NMAC.	11/10/2025
shanna.smith	Monthly removal of measurable LNAPL.	11/10/2025
shanna.smith	El Paso will submit quarterly monitoring and sampling reports.	11/10/2025
shanna.smith	2025 Annual Groundwater Monitoring Report will be submitted by April 1, 2025.	11/10/2025