

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

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

Form C-144  
Revised April 3, 2017

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office.  
For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Pit, Below-Grade Tank, or  
Proposed Alternative Method Permit or Closure Plan Application

- Type of action: ☐ Below grade tank registration  
☐ Permit of a pit or proposed alternative method  
☒ Closure of a pit, below-grade tank, or proposed alternative method  
☐ Modification to an existing permit/or registration  
☐ Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

**Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request**

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.  
Operator: Enduring Resources, LLC OGRID #: 372286  
Address: 200 Energy Court, Farmington, New Mexico 87401  
Facility or well name: Marshall A 3  
API Number: 30-045-06536 OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr G Section 15 Township 27N Range 9W County: San Juan  
Center of Proposed Design: Latitude 36.578597 Longitude -107.772393 NAD83  
Surface Owner: ☐ Federal ☐ State ☐ Private ☒ Tribal Trust or Indian Allotment

2.  
☐ **Pit:** Subsection F, G or J of 19.15.17.11 NMAC  
Temporary: ☐ Drilling ☐ Workover  
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A ☐ Multi-Well Fluid Management Low Chloride Drilling Fluid ☐ yes ☐ no  
☐ Lined ☐ Unlined Liner type: Thickness \_\_\_\_\_ mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other \_\_\_\_\_  
☐ String-Reinforced  
Liner Seams: ☐ Welded ☐ Factory ☐ Other \_\_\_\_\_ Volume: \_\_\_\_\_ bbl Dimensions: L \_\_\_\_\_ x W \_\_\_\_\_ x D \_\_\_\_\_

3.  
☒ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC  
Volume: 12 bbl Type of fluid: Produced Water  
Tank Construction material: Steel  
☐ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off  
☐ Visible sidewalls and liner ☒ Visible sidewalls only ☐ Other \_\_\_\_\_  
Liner type: Thickness \_\_\_\_\_ mil ☐ HDPE ☐ PVC ☐ Other \_\_\_\_\_

4.  
☐ **Alternative Method:**  
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

5.  
**Fencing:** Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks)  
☐ Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school, hospital, institution or church)  
☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet  
☒ Alternate. Please specify 4' wire field fence

6.

**Netting:** Subsection E of 19.15.17.11 NMAC (*Applies to permanent pits and permanent open top tanks*)☒ Screen ☐ Netting ☐ Other \_\_\_\_\_☐ Monthly inspections (If netting or screening is not physically feasible)

7.

**Signs:** Subsection C of 19.15.17.11 NMAC☒ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers☐ Signed in compliance with 19.15.16.8 NMAC

8.

**Variances and Exceptions:**

Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.

**Please check a box if one or more of the following is requested, if not leave blank:**☒ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.☐ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

9.

**Siting Criteria (regarding permitting):** 19.15.17.10 NMAC**Instructions:** The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.**General siting****Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.**- ☐ NM Office of the State Engineer - iWATERS database search; ☐ USGS; ☒ Data obtained from nearby wells☐ Yes ☐ No  
☐ NA**Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.**

NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No  
☐ NAWithin incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. (**Does not apply to below grade tanks**)☐ Yes ☐ No

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

Within the area overlying a subsurface mine. (**Does not apply to below grade tanks**)☐ Yes ☐ No

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

Within an unstable area. (**Does not apply to below grade tanks**)☐ Yes ☐ No

- Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological Society; Topographic map

☐ Yes ☐ NoWithin a 100-year floodplain. (**Does not apply to below grade tanks**)

- FEMA map

**Below Grade Tanks**

Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).

☐ Yes ☐ No

- Topographic map; Visual inspection (certification) of the proposed site

Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;

☐ Yes ☐ No

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

**Temporary Pit using Low Chloride Drilling Fluid** (maximum chloride content 15,000 mg/liter)

Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.)

☐ Yes ☐ No

- Topographic map; Visual inspection (certification) of the proposed site

Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.

☐ Yes ☐ No

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application.

☐ Yes ☐ No

NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

Within 100 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

### **Temporary Pit Non-low chloride drilling fluid**

Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

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, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application;

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

### **Permanent Pit or Multi-Well Fluid Management Pit**

Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 500 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

10.

#### **Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC

**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- ☐ Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

☐ Previously Approved Design (attach copy of design) API Number: \_\_\_\_\_ or Permit Number: \_\_\_\_\_

11.

#### **Multi-Well Fluid Management Pit Checklist:** Subsection B of 19.15.17.9 NMAC

**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ A List of wells with approved application for permit to drill associated with the pit.
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

- ☐ Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC

☐ Previously Approved Design (attach copy of design) API Number: \_\_\_\_\_ or Permit Number: \_\_\_\_\_

12. **Permanent Pits Permit Application Checklist:** Subsection B of 19.15.17.9 NMAC

**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Climatological Factors Assessment
- ☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Quality Control/Quality Assurance Construction and Installation Plan
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Nuisance or Hazardous Odors, including H<sub>2</sub>S, Prevention Plan
- ☐ Emergency Response Plan
- ☐ Oil Field Waste Stream Characterization
- ☐ Monitoring and Inspection Plan
- ☐ Erosion Control Plan
- ☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

13. **Proposed Closure:** 19.15.17.13 NMAC

**Instructions:** Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.

- Type: ☐ Drilling ☐ Workover ☐ Emergency ☐ Cavitation ☐ P&A ☐ Permanent Pit ☐ Below-grade Tank ☐ Multi-well Fluid Management Pit  
☐ Alternative
- Proposed Closure Method: ☐ Waste Excavation and Removal  
☐ Waste Removal (Closed-loop systems only)  
☐ On-site Closure Method (Only for temporary pits and closed-loop systems)  
☐ In-place Burial ☐ On-site Trench Burial  
☐ Alternative Closure Method

14. **Waste Excavation and Removal Closure Plan Checklist:** (19.15.17.13 NMAC) **Instructions:** Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC
- ☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)
- ☐ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

15. **Siting Criteria (regarding on-site closure methods only):** 19.15.17.10 NMAC

**Instructions:** Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.

Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	

adopted pursuant to NMSA 1978, Section 3-27-3, as amended.

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

☐ Yes ☐ No

Within the area overlying a subsurface mine.

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

☐ Yes ☐ No

Within an unstable area.

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

☐ Yes ☐ No

Within a 100-year floodplain.

- FEMA map

☐ Yes ☐ No

16. **On-Site Closure Plan Checklist:** (19.15.17.13 NMAC) *Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.*

- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  
☐ Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC  
☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 NMAC  
☐ Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC  
☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC  
☐ Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC  
☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)  
☐ Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  
☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

17. **Operator Application Certification:**

I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

Name (Print): \_\_\_\_\_ Title: \_\_\_\_\_

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

e-mail address: \_\_\_\_\_ Telephone: \_\_\_\_\_

18. **OCD Approval:** ☐ Permit Application (including closure plan) ☒ Closure Plan (only) ☐ OCD Conditions (see attachment)  
 Report

**OCD Representative Signature:** Victoria Venegas **Approval Date:** 11/04/2021

**Title:** Environmental Specialist **OCD Permit Number:** BGT1

19. **Closure Report (required within 60 days of closure completion):** 19.15.17.13 NMAC

*Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.*

☒ **Closure Completion Date:** 8/25/2020

20. **Closure Method:**

- ☒ Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-loop systems only)  
☐ If different from approved plan, please explain.

21. **Closure Report Attachment Checklist:** *Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.*

- ☒ Proof of Closure Notice (surface owner and division)  
☐ Proof of Deed Notice (required for on-site closure for private land only)  
☐ Plot Plan (for on-site closures and temporary pits)  
☒ Confirmation Sampling Analytical Results (if applicable)  
☐ Waste Material Sampling Analytical Results (required for on-site closure)  
☒ Disposal Facility Name and Permit Number  
☒ Soil Backfilling and Cover Installation  
☒ Re-vegetation Application Rates and Seeding Technique  
☒ Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude \_\_\_\_\_ Longitude \_\_\_\_\_ NAD: ☐ 1927 ☐ 1983

22.

**Operator Closure Certification:**

I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.

Name (Print): James McDanielTitle: HSE SupervisorSignature: Date: 9/9/2020e-mail address: jmcDaniel@enduringresources.comTelephone: 505-636-9731

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1625 N. French Dr., Hobbs, NM 88240  
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State of New Mexico  
Energy Minerals and Natural  
Resources Department  
  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-141  
Revised August 24, 2018  
Submit to appropriate OCD District office

Incident ID	
District RP	
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party: <b>Enduring Resources</b>	OGRID: <b>372286</b>
Contact Name: <b>James McDaniel</b>	Contact Telephone: <b>(505) 636-9731</b>
Contact email: <b>jmcdaniel@enduringresources.com</b>	Incident # (assigned by OCD)
Contact mailing address: <b>200 Energy Court</b>	<b>Farmington, New Mexico 87401</b>

### Location of Release Source

Latitude 36.578597 Longitude -107.772393  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: <b>Marshall A 3</b>	Site Type: <b>Wellsite</b>
Date Release Discovered: <b>7/29/2020</b>	API# (if applicable) <b>30-045-06536</b>

Unit Letter	Section	Township	Range	County
<b>G</b>	<b>15</b>	<b>27N</b>	<b>9W</b>	<b>San Juan</b>

Surface Owner: ☐ State ☐ Federal ☒ Tribal ☐ Private (Name: \_\_\_\_\_)

### Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls): <b>UNK</b>	Volume Recovered (bbls): <b>NONE</b>
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

#### Cause of Release:

On 7/29/2020, BGT closure activities were performed at this location. Samples were collected from beneath the location of the BGT after it was removed, and samples results were above Tale I Standards, confirming that a release had occurred. A Spill Closure Report will be submitted detailing spill closure activities.

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC?  <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release?     
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?     	

### Initial Response

*The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury*

- ☒ The source of the release has been stopped.
- ☒ The impacted area has been secured to protect human health and the environment.
- ☒ Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.
- ☒ All free liquids and recoverable materials have been removed and managed appropriately.

If all the actions described above have not been undertaken, explain why:

Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.

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: James McDaniel

Title: HSE Supervisor

Signature: 

Date: 9/9/2020

email: jmcdaniel@enduringresources.com

Telephone: (505) 636-9731

#### OCD Only

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

Incident ID	
District RP	
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?	_____ (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input 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 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 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 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 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 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 type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input 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 1/2-mile of the lateral extents of the release
- ☐ Boring or excavation logs
- ☐ Photographs including date and GIS information
- ☐ Topographic/Aerial maps
- ☐ Laboratory data including chain of custody

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

## Oil Conservation Division

Incident ID	
District RP	
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: \_\_\_\_\_ Title: \_\_\_\_\_

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

email: \_\_\_\_\_ Telephone: \_\_\_\_\_

**OCD Only**

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

Incident ID	
District RP	
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: \_\_\_\_\_ Title: \_\_\_\_\_

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

email: \_\_\_\_\_ Telephone: \_\_\_\_\_

**OCD Only**

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

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

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

Incident ID	
District RP	
Facility ID	
Application ID	

## Closure

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

**Closure Report Attachment Checklist:** *Each of the following items must be included in the closure report.*

- ☐ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☐ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☐ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☐ Description of remediation activities

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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

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

email: \_\_\_\_\_ Telephone: \_\_\_\_\_

**OCD Only**

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

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

## Enduring Resources, LLC Below Grade Tank Closure Report

**Lease Name:** Marshall A 3

**API No.:** 30-045-06536

**Description:** Unit G, Section 15, Township 27N, Range 9W, San Juan County

In accordance with Rule 19.15.17.13 NMAC the following information describes the closure requirements of below-grade tanks on Enduring Resources, LLC. (Enduring) locations. This is Enduring's standard procedure for all below-grade tanks. A separate plan will be submitted for any below-grade tank which does not conform to this plan.

### General Plan

1. Enduring will close below-grade tanks within the time periods provided in 19.15.17.13 NMAC, or by an earlier date that the division requires because of imminent danger to fresh water, public health or the environment.  
**Closure Date is August 25, 2020**
2. Enduring will close a below-grade tank that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five years after June 16, 2008, if not retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC.  
**Closure Date is August 25, 2020**
3. Enduring will close a permitted below-grade tank within 60 days of cessation of the below-grade tank's operation or as required by the transitional provisions of Subsection B of 19.15.17.17 NMAC in accordance with a closure plan that the appropriate division district office approves. The closure report will be filed on form C-144.  
**Required C-144 Form is attached to this document.**
4. Enduring will remove liquids and sludge from below-grade tanks prior to implementing a closure method and will dispose of the liquids and sludge in a division-approved facility. Approved facilities and waste streams include:
  - Envirotech Permit No. NM01-0011 and IEI Permit No. NM 01-0010B
    - Soil contaminated by exempt petroleum hydrocarbons
    - Produced sand, pit sludge and contaminated bottoms from storage of exempt wastes
  - Basin Disposal Permit No. NM01-005
    - Produced water**All liquids and sludge were removed from the tank prior to closure activities.**
5. Enduring will remove the below-grade tank and dispose of it in a division approved facility or recycle, reuse, or reclaim it in a manner that the appropriate division district office approves.  
**Enduring has removed the below grade tank, and will dispose of it at a division approved facility, or recycle, reclaim or reuse it in a manner that is approved by the division.**

6. Enduring will remove any on-site equipment associated with a below-grade tank unless the equipment is required for some other purpose.  
**This location is still in production. All other on-site equipment will be utilized in the continued production of oil and gas.**
7. Enduring will test the soils beneath the below-grade tank to determine whether a release has occurred. At a minimum 5 point composite sample will be collected along with individual grab samples from any area that is wet, discolored or showing other evidence of a release. Samples will be analyzed for BTEX, TPH and chlorides to demonstrate that the benzene concentration, as determined by EPA SW-846 methods 8021B or 8260B or EPA method that the division approves, does not exceed 0.2 mg/kg; total BTEX concentration, as determined by EPA SW-846 methods 8021B or 8260B or other EPA method that the division approves, does not exceed 50 mg/kg; the TPH concentration, as determined by EPA method 8015M or other EPA method that the division approves, does not exceed 100mg/kg; and the chloride concentration, as determined by EPA method 9056A or other EPA method that the division approves, does not exceed 250 mg/kg, or the background concentration, whichever is greater. Enduring will notify the division of its results on form C-141.

**A release was confirmed visually due to some liquids left in the BGT being spilled out during the BGT removal.**

Components	Test Method	Limit (mg/Kg)	Results
Benzene	EPA SW-846 8021B or 8260B	0.2	< 0.025 mg/kg
BTEX	EPA SW-846 8021B or 8260B	50	< 0.1 mg/kg
TPH	EPA SW-846 8015M	100	1,533 mg/kg
Chlorides	EPA 9056A	250 or background	< 20.0

8. If Enduring or the division determines that a release has occurred, Enduring will comply with 19.15.3.116 NMAC and 19.15.1.19NMAC as appropriate.  
**A release was confirmed for this location due to TPH levels of 1,533 ppm. A separate closure report will be submitted detailing spill closure activities.**
9. If the sampling program demonstrates that a release has not occurred or that any release does not exceed the concentrations specified in Paragraph (4) of Subsection E of 19.15.17.13 NMAC, Enduring will backfill the excavation with compacted, non-waste containing, earthen material; construct a division prescribed soil cover; recontour and re-vegetate the site.  
**The site has been backfilled, and will be recontoured and revegetated upon P&A of the wellsite.**
10. Notice of Closure operations will be given to the Aztec Division District III office between 72 hours and one week prior to the start of closure activities via email or verbally.  
The notification will include the following:
- i. Operator's name
  - ii. Well Name and API Number
  - iii. Location by Unit Letter, Section, Township, and Range
- Notification was provided to Mr. Cory Smith with the Aztec office of the OCD via email on July 24, 2020; see attached email printout.**

The surface owner shall be notified of Enduring's proposal to close the BGT as per the approved closure plan using certified mail, return receipt requested.

**The BLM and FIMO were notified on July 24, 2020 via email; see attached email printout.**

11. Re-contouring of location will match fit, shape, line, form and texture of the surrounding area. Re-shaping will include drainage control, prevent ponding, and prevent erosion. Natural drainages will be unimpeded and water bars and/or silt traps will be placed in areas where needed to prevent erosion on a large scale. Final re-contour shall have a uniform appearance with smooth surface, fitting the natural landscape.  
**This site will be recontoured and revegetated once plugging and abandoning activities have been completed. The site will be recontoured to match the above mentioned specifications.**
12. A minimum of 4 feet of cover shall be achieved and the cover shall include 1 foot of suitable material to establish vegetation at the site, or the background thickness of topsoil, whichever is greater.  
**The area has been backfilled to match these specifications.**
13. Enduring will seed the disturbed areas the first growing season after the operator closes the pit. Seeding will be accomplished via drilling on the contour whenever practical or by other division-approved methods. BLM or Forest Service stipulated seed mixes will be used on federal lands. Vegetative cover will equal 70% of the native perennial vegetative cover (un-impacted) consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintain that cover through two successive growing seasons. Repeat seeding or planting will be continued until successful vegetative growth occurs.  
**The site will be re-seeded per the FIMO requirements once plugging and abandoning activities have been completed.**
14. All closure activities will include proper documentation and be available for review upon request and will be submitted in closure report form to OCD within 60 days of closure of the below-grade tank. Closure report will be filed on form C-144 and incorporate the following:
  - Proof of closure notice to division and surface owner; **attached**
  - Details on capping and covering, where applicable; **per OCD Specifications**
  - Confirmation sampling analytical results; **attached**
  - Disposal facility name(s) and permit number(s); **attached**
  - Soil backfilling and cover installation; **per OCD Specifications**
  - Re-vegetation application rates and seeding techniques, (or approved alternative to re-vegetation requirements if applicable); **pursuant to FIMO requirements**
  - Photo documentation of the site reclamation. **attached**

Mr. Cory Smith  
Oil Conservation Division  
1000 Rio Brazos Rd.  
Aztec, New Mexico 87410  
Email: cory.smith@state.nm.us  
Phone (505) 334-6178 Ext 115

Re: Variance Request for 19.15.17 NMAC Table I and Table II

Mr. Smith,

Please accept this letter as a variance request as outlined in 19.15.17.15(A) NMAC. Enduring Resources, LLC (Enduring) would like to request the replacement of USEPA Method 418.1 for the analysis of Total Petroleum Hydrocarbons (TPH) for USEPA Method 8015M, measuring carbon ranges C6-C36, for all sampling associated with closures and confirmations samples in relation to 19.15.17 NMAC, both in Table I and Table II (2103) and the 'pit rule' passed in 2008. Enduring is requesting this variance on the grounds that USEPA Method 418.1 is an outdated analytical method that reports a full range of hydrocarbons from C5 through C40 (*Reference: American Petroleum Institute*).

The attached table demonstrates the carbon ranges, and the typical hydrocarbon products that can be found in those ranges. As you can see, lube oil ranges from C28-C35. Analytical Method USEPA 418.1 extends past lube oils from C35 through C40. This range of hydrocarbons is above the range that can reasonably be expected to be found in our field in both drilling pits and beneath below grade tanks. USEPA Method 8015M (GRO/DRO + extended analysis) will report hydrocarbons ranging from C6-C10 for GRO, C10- C28 for DRO, and C28-C36 for extended analysis. This information was provided by Environmental Science Corporation Laboratories. As the information demonstrates, the 8015M analytical method reports as low as C6, reporting lower than USEPA Method 418.1. Utilizing analytical method 8015M, lighter range hydrocarbons will be reported instead of higher range, heavy hydrocarbons that may not be reasonably expected to be found in our field. Utilization of USEPA Method 8015M will better protect groundwater resources by identifying lighter, more mobile hydrocarbons that USEPA Method 418.1 cannot identify. The heavier range hydrocarbons, C36-C40, that are not identified by USEPA Method 8015M are not a mobile form of hydrocarbon, and are not a threat to human health and the environment. With your acceptance of this variance request, Enduring Resources will begin utilizing USEPA Method 8015M in place of USEPA Method 418.1 for all sampling activities associated with 19.15.17 NMAC, both from the rules passed in 2008 and 2013.

Respectfully Submitted,

James McDaniel, CHMM #15676  
HSE Supervisor  
Enduring Resources, LLC

#### **Carbon Ranges of Typical Hydrocarbons**

##### **Hydrocarbon Carbon Range**

**Condensate C2-C12**

**Aromatics C5-C7**

**Gasoline C7-C11**

**Kerosene C6-C16**

**Diesel Fuel C8-C21**

**Fuel Oil #1 C9-C16**

**Fuel Oil #2 C11-C20**

**Heating Oil C14-C20**

**Lube Oil C28-C35**





**X = Sample Locations**

32 ft

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## James McDaniel

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**From:** James McDaniel  
**Sent:** Friday, July 24, 2020 12:48 PM  
**To:** 'Smith, Cory, EMNRD'; 'Abiodun Emmanuel Adeloje'; 'Maureen Joe'  
**Cc:** Heather Huntington; David Rogers; Kyle Walter  
**Subject:** RE: Below Grade Tank Closure Notifications

Ladies and Gentlemen,

Please accept this email as the required notification for below grade tank closure activities at the two wells below:

John Charles 2, 30-045-06480, located in Section 13E, Township 27N, Range 9W, San Juan County, New Mexico.

Marshall A 3, 30-045-06536, located in Section 15G, Township 27N, Range 9W, San Juan County, New Mexico.

Closure activities will begin at 10 AM at the Marshall A 3, with the John Charles 2 closure activities taking place immediately following. Thank you for your time in regards to this matter.

*\*Closure activities will take place on Wednesday, July 29, 2020.*

**James McDaniel**  
**HSE Supervisor**  
**Enduring Resources**

CSP #30009

CHMM #15676

CIT #13805

Office: 505-636-9731

Cell: 505-444-3004

[jmcdaniel@enduringresources.com](mailto:jmcdaniel@enduringresources.com)



**From:** James McDaniel  
**Sent:** Friday, July 24, 2020 12:47 PM  
**To:** 'Smith, Cory, EMNRD' <Cory.Smith@state.nm.us>; 'Abiodun Emmanuel Adeloje' <aadeloje@blm.gov>; 'Maureen Joe' <maureen.joe@bia.gov>  
**Cc:** Heather Huntington <Hhuntington@enduringresources.com>; David Rogers <DRogers@enduringresources.com>; Kyle Walter <KWalter@enduringresources.com>  
**Subject:** Below Grade Tank Closure Notifications

Ladies and Gentlemen,

Please accept this email as the required notification for below grade tank closure activities at the two wells below:

John Charles 2, 30-045-06480, located in Section 13E, Township 27N, Range 9W, San Juan County, New Mexico.

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Closure activities will begin at 10 AM at the Marshall A 3, with the John Charles 2 closure activities taking place immediately following. Thank you for your time in regards to this matter.

**James McDaniel**

**HSE Supervisor**

**Enduring Resources**

CSP #30009

CHMM #15676

CIT #13805

Office: 505-636-9731

Cell: 505-444-3004

[jmcdaniel@enduringresources.com](mailto:jmcdaniel@enduringresources.com)





## Analytical Report

### Report Summary

Client: Enduring Resources, LLC

Samples Received: 7/29/2020

Job Number: 17065-0017

Work Order: P007079

Project Name/Location: Marshall A3

Report Reviewed By:

A handwritten signature in black ink, appearing to read 'Walter Hinchman', is written over a horizontal line.

Date: 7/31/20

Walter Hinchman, Laboratory Director



Envirotech Inc. certifies the test results meet all requirements of TNI unless footnoted otherwise.  
Statement of Data Authenticity: Envirotech, Inc, attests the data reported has not been altered in any way.  
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Envirotech, Inc, holds the Utah TNI certification NM009792018-1 for the data reported.  
Envirotech, Inc, holds the Texas TNI certification T104704557-19-2 for the data reported.





Enduring Resources, LLC  
511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

**Reported:**  
07/31/20 10:36

### Sample Summary

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
BGT Composite	P007079-01A	Soil	07/29/20	07/29/20	Glass Jar, 4 oz.

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Enduring Resources, LLC  
511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

Reported:  
07/31/20 10:36

**BGT Composite  
P007079-01 (Solid)**

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
<b>Volatile Organics by EPA 8021B</b>	mg/kg	mg/kg				Batch: 2031011
Benzene	ND	0.0250	1	07/29/20	07/29/20	
Toluene	ND	0.0250	1	07/29/20	07/29/20	
Ethylbenzene	ND	0.0250	1	07/29/20	07/29/20	
p,m-Xylene	ND	0.0500	1	07/29/20	07/29/20	
o-Xylene	ND	0.0250	1	07/29/20	07/29/20	
Total Xylenes	ND	0.0250	1	07/29/20	07/29/20	
Surrogate: 4-Bromochlorobenzene-PID	103 %	50-150		07/29/20	07/29/20	
<b>Nonhalogenated Organics by EPA 8015D - GRO</b>	mg/kg	mg/kg				Batch: 2031011
Gasoline Range Organics (C6-C10)	ND	20.0	1	07/29/20	07/29/20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	91.9 %	50-150		07/29/20	07/29/20	
<b>Nonhalogenated Organics by EPA 8015D - DRO/ORO</b>	mg/kg	mg/kg				Batch: 2031015
Diesel Range Organics (C10-C28)	433	25.0	1	07/29/20	07/29/20	
Oil Range Organics (C28-C40)	1100	50.0	1	07/29/20	07/29/20	
Surrogate: n-Nonane	98.9 %	50-200		07/29/20	07/29/20	
<b>Anions by EPA 300.0/9056A</b>	mg/kg	mg/kg				Batch: 2031012
Chloride	ND	20.0	1	07/29/20	07/29/20	

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Enduring Resources, LLC  
511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

Reported:  
07/31/20 10:36

### Volatile Organics by EPA 8021B - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	

#### Blank (2031011-BLK1)

Prepared & Analyzed: 07/29/20 1

Benzene	ND	0.0250
Toluene	ND	0.0250
Ethylbenzene	ND	0.0250
p,m-Xylene	ND	0.0500
o-Xylene	ND	0.0250
Total Xylenes	ND	0.0250

Surrogate: 4-Bromochlorobenzene-PID 8.16 8.00 102 50-150

#### LCS (2031011-BS1)

Prepared & Analyzed: 07/29/20 1

Benzene	5.16	0.0250	5.00	103	70-130
Toluene	5.18	0.0250	5.00	104	70-130
Ethylbenzene	5.15	0.0250	5.00	103	70-130
p,m-Xylene	10.3	0.0500	10.0	103	70-130
o-Xylene	5.17	0.0250	5.00	103	70-130
Total Xylenes	15.5	0.0250	15.0	103	0-200

Surrogate: 4-Bromochlorobenzene-PID 8.54 8.00 107 50-150

#### Matrix Spike (2031011-MS1)

Source: P007075-01

Prepared & Analyzed: 07/29/20 1

Benzene	4.95	0.0250	5.00	ND	99.0	54.3-133
Toluene	4.95	0.0250	5.00	ND	99.0	61.4-130
Ethylbenzene	4.93	0.0250	5.00	ND	98.6	61.4-133
p,m-Xylene	9.87	0.0500	10.0	ND	98.7	63.3-131
o-Xylene	4.93	0.0250	5.00	ND	98.6	63.3-131
Total Xylenes	14.8	0.0250	15.0	ND	98.7	0-200

Surrogate: 4-Bromochlorobenzene-PID 8.17 8.00 102 50-150

#### Matrix Spike Dup (2031011-MSD1)

Source: P007075-01

Prepared & Analyzed: 07/29/20 1

Benzene	5.24	0.0250	5.00	ND	105	54.3-133	5.71	20
Toluene	5.22	0.0250	5.00	ND	104	61.4-130	5.30	20
Ethylbenzene	5.19	0.0250	5.00	ND	104	61.4-133	5.17	20
p,m-Xylene	10.4	0.0500	10.0	ND	104	63.3-131	5.12	20
o-Xylene	5.20	0.0250	5.00	ND	104	63.3-131	5.28	20
Total Xylenes	15.6	0.0250	15.0	ND	104	0-200	5.17	200

Surrogate: 4-Bromochlorobenzene-PID 8.20 8.00 102 50-150

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Enduring Resources, LLC	Project Name:	Marshall A3	
511 16th Street, Suite 700	Project Number:	17065-0017	Reported:
Denver CO, 80202	Project Manager:	James McDaniel	07/31/20 10:36

### Nonhalogenated Organics by EPA 8015D - GRO - Quality Control

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	REC %	REC Limits %	RPD %	RPD Limit %	Notes
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#### Blank (2031011-BLK1)

Prepared &amp; Analyzed: 07/29/20 1

Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.51		8.00		93.9	50-150			

#### LCS (2031011-BS2)

Prepared &amp; Analyzed: 07/29/20 1

Gasoline Range Organics (C6-C10)	47.5	20.0	50.0		95.0	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.42		8.00		92.7	50-150			

#### Matrix Spike (2031011-MS2)

Source: P007075-01

Prepared &amp; Analyzed: 07/29/20 1

Gasoline Range Organics (C6-C10)	50.7	20.0	50.0	ND	101	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.58		8.00		94.8	50-150			

#### Matrix Spike Dup (2031011-MSD2)

Source: P007075-01

Prepared &amp; Analyzed: 07/29/20 1

Gasoline Range Organics (C6-C10)	48.8	20.0	50.0	ND	97.6	70-130	3.83	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.51		8.00		93.9	50-150			

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Enduring Resources, LLC	Project Name:	Marshall A3	Reported: 07/31/20 10:36
511 16th Street, Suite 700	Project Number:	17065-0017	
Denver CO, 80202	Project Manager:	James McDaniel	

### Nonhalogenated Organics by EPA 8015D - DRO/ORO - Quality Control

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	REC %	REC Limits %	RPD %	RPD Limit %	Notes
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#### Blank (2031015-BLK1)

Prepared &amp; Analyzed: 07/29/20 1

Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C40)	ND	50.0							
Surrogate: n-Nonane	52.4		50.0		105	50-200			

#### LCS (2031015-BS1)

Prepared: 07/29/20 1 Analyzed: 07/29/20 2

Diesel Range Organics (C10-C28)	470	25.0	500		94.1	38-132			
Surrogate: n-Nonane	52.6		50.0		105	50-200			

#### Matrix Spike (2031015-MS1)

Source: P007079-01 Prepared: 07/29/20 1 Analyzed: 07/29/20 2

Diesel Range Organics (C10-C28)	947	25.0	500	433	103	38-132			
Surrogate: n-Nonane	48.8		50.0		97.6	50-200			

#### Matrix Spike Dup (2031015-MSD1)

Source: P007079-01 Prepared: 07/29/20 1 Analyzed: 07/29/20 2

Diesel Range Organics (C10-C28)	984	25.0	500	433	110	38-132	3.83	20	
Surrogate: n-Nonane	48.8		50.0		97.5	50-200			

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Envirotech, Inc | 5796 U.S Highway 64 | Farmington, NM 87401 | 505.632.1881 | Envirotech-inc.com





Enduring Resources, LLC	Project Name:	Marshall A3	Reported: 07/31/20 10:36
511 16th Street, Suite 700	Project Number:	17065-0017	
Denver CO, 80202	Project Manager:	James McDaniel	

## Anions by EPA 300.0/9056A - Quality Control

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	REC %	REC Limits %	RPD %	RPD Limit %	Notes
<b>Blank (2031012-BLK1)</b>						Prepared & Analyzed: 07/29/20 1			
Chloride	ND	20.0							
<b>LCS (2031012-BS1)</b>						Prepared & Analyzed: 07/29/20 1			
Chloride	252	20.0	250		101	90-110			
<b>Matrix Spike (2031012-MS1)</b>						Source: P007075-01 Prepared & Analyzed: 07/29/20 1			
Chloride	353	20.0	250	97.6	102	80-120			
<b>Matrix Spike Dup (2031012-MSD1)</b>						Source: P007075-01 Prepared & Analyzed: 07/29/20 1			
Chloride	353	20.0	250	97.6	102	80-120	0.00283	20	

## QC Summary Report Comment:

Calculations are based off of the raw (non-rounded) data. However, for reporting purposes all QC data is rounded to three significant figures. Therefore, hand calculated values may differ slightly.

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Enduring Resources, LLC  
511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

**Reported:**  
07/31/20 10:36

#### Notes and Definitions

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

RPD Relative Percent Difference

\*\* Methods marked with \*\* are non-accredited methods.

Soil data is reported on an "as received" weight basis, unless reported otherwise.

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### Project Information

### Chain of Custody

Page 1 of 9

Page 9 of 9

[illegible]

5795 US Highway 64, Farmington, NM 87401  
24 Hour Emergency Response Phone (602) 302-1879

Ph (905) 532-1851 Fax (905) 532-1855

enwintech-inc.com  
labadm@enwintech-inc.com



Enduring Resources, LLC  
BGT Closure Report  
Marshall A 3  
30-045-06536



PHOTO 1: Visual Confirmation of Release Occurring During BGT Removal



PHOTO 2: Former BGT Location after Removal (7/29/2020)



Enduring Resources, LLC  
BGT Closure Report  
Marshall A 3  
30-045-06536

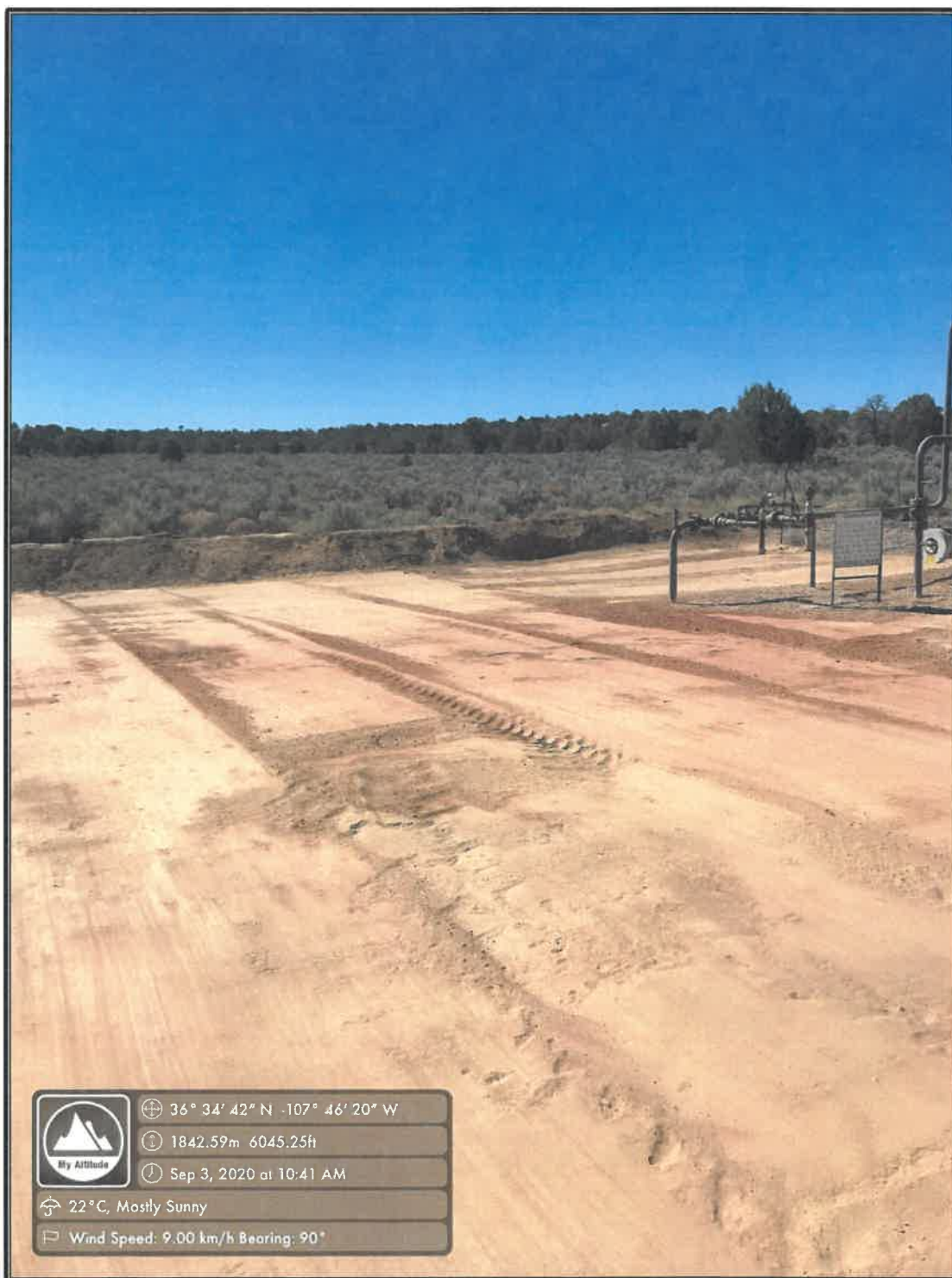


PHOTO 3: BGT Area after Backfill

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

State of New Mexico  
Energy Minerals and Natural  
Resources Department

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

Form C-141  
Revised August 24, 2018  
Submit to appropriate OCD District office

Incident ID	NRM2025557321
District RP	
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party: <b>Enduring Resources</b>	OGRID: <b>372286</b>
Contact Name: <b>James McDaniel</b>	Contact Telephone: <b>(505) 636-9731</b>
Contact email: <b>jmcDaniel@enduringresources.com</b>	Incident # (assigned by OCD)
Contact mailing address: <b>200 Energy Court</b>	<b>Farmington, New Mexico 87401</b>

### Location of Release Source

Latitude 36.578597 Longitude -107.772393  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: <b>Marshall A 3</b>	Site Type: <b>Wellsite</b>
Date Release Discovered: <b>7/29/2020</b>	API# (if applicable) <b>30-045-06536</b>

Unit Letter	Section	Township	Range	County
<b>G</b>	<b>15</b>	<b>27N</b>	<b>9W</b>	<b>San Juan</b>

Surface Owner: ☐ State ☐ Federal ☒ Tribal ☐ Private (Name: \_\_\_\_\_)

### Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls): <b>UNK</b>	Volume Recovered (bbls): <b>NONE</b>
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

#### Cause of Release:

On 7/29/2020, BGT closure activities were performed at this location. Samples were collected from beneath the location of the BGT after it was removed, and samples results were above Tale I Standards, confirming that a release had occurred. Excavation was performed, and the spill was remediated. An outline of all remediation activities are detailed in the attached *Remediation Narrative*.

State of New Mexico  
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC?  <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?	

**Initial Response**

*The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury*

<input type="checkbox"/> The source of the release has been stopped. <input type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why:	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
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: _____	Title: _____
Signature: _____	Date: _____
email: _____	Telephone: _____
<b><u>OCD Only</u></b>  Received by: _____ Ramona Marcus Date: 9/11/2020	

Incident ID	
District RP	
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?	_____ (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input 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 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 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 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 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 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 type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input 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.

Incident ID	
District RP	
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: \_\_\_\_\_ Title: \_\_\_\_\_

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

email: \_\_\_\_\_ Telephone: \_\_\_\_\_

**OCD Only**

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

Incident ID	
District RP	
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: \_\_\_\_\_ Title: \_\_\_\_\_  
Signature: \_\_\_\_\_ Date: \_\_\_\_\_  
email: \_\_\_\_\_ Telephone: \_\_\_\_\_

**OCD Only**

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

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

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

Incident ID	NRM2025557321
District RP	
Facility ID	
Application ID	

## Closure

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

**Closure Report Attachment Checklist:** *Each of the following items must be included in the closure report.*

- ☒ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☒ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☒ Laboratory analyses of final sampling (Note: appropriate OCD District office must be notified 2 days prior to final sampling)
- ☒ Description of remediation activities

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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: James McDaniel Title: HSE Supervisor

Signature:  Date: 9/9/2020

email: jmcDaniel@enduringresources.com Telephone: 505-636-9731

### OCD Only

Received by: Ramona Marcus Date: 9/11/2020

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

NRM2025557321

### Marshall A 3 Narrative

**7/29/2020**

BGT Activities occurred at the Marshall A 3 due to an unused BGT. The BGT was removed, and a closure sample was collected beneath the former location of the BGT. The BGT Closure Sample returned results above the Table I standards for this location, confirming that a release had occurred; see *Table I Analytical Results* and the *Sampling Map*. Abiodun Adeloye with the Farmington Field Office of the BLM was on-site to witness sample collection.

**7/31/2020**

Excavation was performed, excavating the former BGT area to extents of 8' x 5' x 2' deep. Impacted soil sent to Envirotech for disposal. Notification was submitted to the BLM, NMOCD and FIMO via email to inform of the date of closure sampling, see *Email Notification Printouts*.

**8/3/2020**

Additional sampling performed on the excavated area. One (1) composite sample was collected from the bottom of the excavation, and one (1) composite sample was collected of the four (4) walls of the excavation. These samples were submitted to Envirotech for analysis. Abiodun Adeloye with the Farmington Field Office of the BLM was on-site to witness sample collection.

**8/10/2020**

Both samples returned results above the Table I Standards for this location, indicating that additional excavation would be required; see attached *Analytical Results* and *Sampling Map*.

**8/11/2020**

Additional excavation occurred at this site, extending the excavated area to extents of 8' x 10' x 5' deep. Notification was submitted to the BLM, NMOCD and FIMO via email to inform of the date of closure sampling, see *Email Notification Printouts*.

**8/13/2020**

Additional sampling was performed on the excavated area. One (1) composite sample was collected from the bottom at 5' deep, and one (1) composite sample was collected of each of the four (4) walls of the excavation. Five (5) total composite samples were collected from the excavation, and were submitted to Envirotech for analysis. Abiodun Adeloye with the Farmington Field Office of the BLM was on-site to witness sample collection.

**8/20/2020**

Analytical result of samples collected on 8/13/2020 indicated that three (3) of the samples collected returned results below the Table I Standards for this location; see attached *Analytical*

*Results and Table I Analytical Results.* Two (2) samples returned results above Table I standards. The composite sample from the South Wall of the excavation, and from the bottom of the excavation both returned results above the 100 mg/kg TPH standards determined for this location; see attached *Analytical Results* and *Table I Analytical Results*

**8/21/2020**

Notification was submitted to the BLM, NMOCD and FIMO via email to inform of the date of closure sampling, see *Email Notification Printouts*.

**8/24/2020**

Additional excavation occurred at this site, extending the excavated area to extents of 10' x 10' x 9' deep.

**8/25/2020**

Additional sampling was performed on the excavated area. One (1) composite sample was collected from the bottom at 9' deep, and one (1) composite sample was collected of the south wall of the excavation. Two (2) total samples were collected from the excavation, and were submitted to Envirotech for analysis. Abiodun Adelaye with the Farmington Field Office of the BLM was on-site to witness sample collection.

**8/27/2020**

Sample results indicated that all samples had returned results below the Table I results determined for this site. No further excavation is required; see attached *Analytical Results* and *Table I Analytical Results*

**9/3/2020**

Excavated area was backfilled and recontoured to meet NMOCD specifications; see attached *Photo Page*.

Table I Analytical Results - Marshall A 3

Sample Name	Description	Date	DRO	GRO	ORO	Total TPH	Benzene	Toluene	Ethylbenzene	Xylenes	Total BTEX		Chlorides	Square Footage
											50	600		
	Top 4'	NA	NA	NA	NA	100	10	NA	NA	NA	ppm	ppm	ppm	200 sq. ft
BGT Composite	BGT Composite	7/29/2020	433	< 20	1100	1533.0	< 0.0250	< 0.0250	< 0.0250	< 0.0250	< 0.1	< 20	< 20	NA
Wall Composite	8' x 5' x 2' deep	8/3/2020	476	< 20	1150	1626.0	< 0.0250	< 0.0250	< 0.0250	< 0.0250	< 0.1	< 20	< 20	40
Bottom Composite	8' x 5' x 2' deep	8/3/2020	38	< 20	89.1	127.1	< 0.0250	< 0.0250	< 0.0250	< 0.0250	< 0.1	< 20	< 20	52
South Wall	8' x 10' x 5' deep	8/13/2020	391	< 20	977	1368.0	< 0.0250	< 0.0250	< 0.0250	< 0.0250	< 0.1	< 20	< 20	50
East Wall	8' x 10' x 5' deep	8/13/2020	< 25	< 20	< 50	< 95	< 0.0250	< 0.0250	< 0.0250	< 0.0250	< 0.1	< 20	< 20	40
West Wall	8' x 10' x 5' deep	8/13/2020	< 25	< 20	< 50	< 95	< 0.0250	< 0.0250	< 0.0250	< 0.0250	< 0.1	< 20	< 20	40
North Wall	8' x 10' x 5' deep	8/13/2020	< 25	< 20	< 50	< 95	< 0.0250	< 0.0250	< 0.0250	< 0.0250	< 0.1	< 20	< 20	50
Bottom @ 5'	8' x 10' x 5' deep	8/13/2020	32	< 20	78.4	110.4	< 0.0250	< 0.0250	< 0.0250	< 0.0250	< 0.1	< 20	< 20	80
Bottom 9'	10' x 10' x 9' deep	8/25/2020	< 25	< 20	< 50	< 95	< 0.0250	< 0.0250	< 0.0250	< 0.0250	< 0.1	< 20	< 20	100
South Wall	10' x 10' x 9' deep	8/25/2020	< 25	< 20	< 50	< 95	< 0.0250	< 0.0250	< 0.0250	< 0.0250	< 0.1	< 20	< 20	90

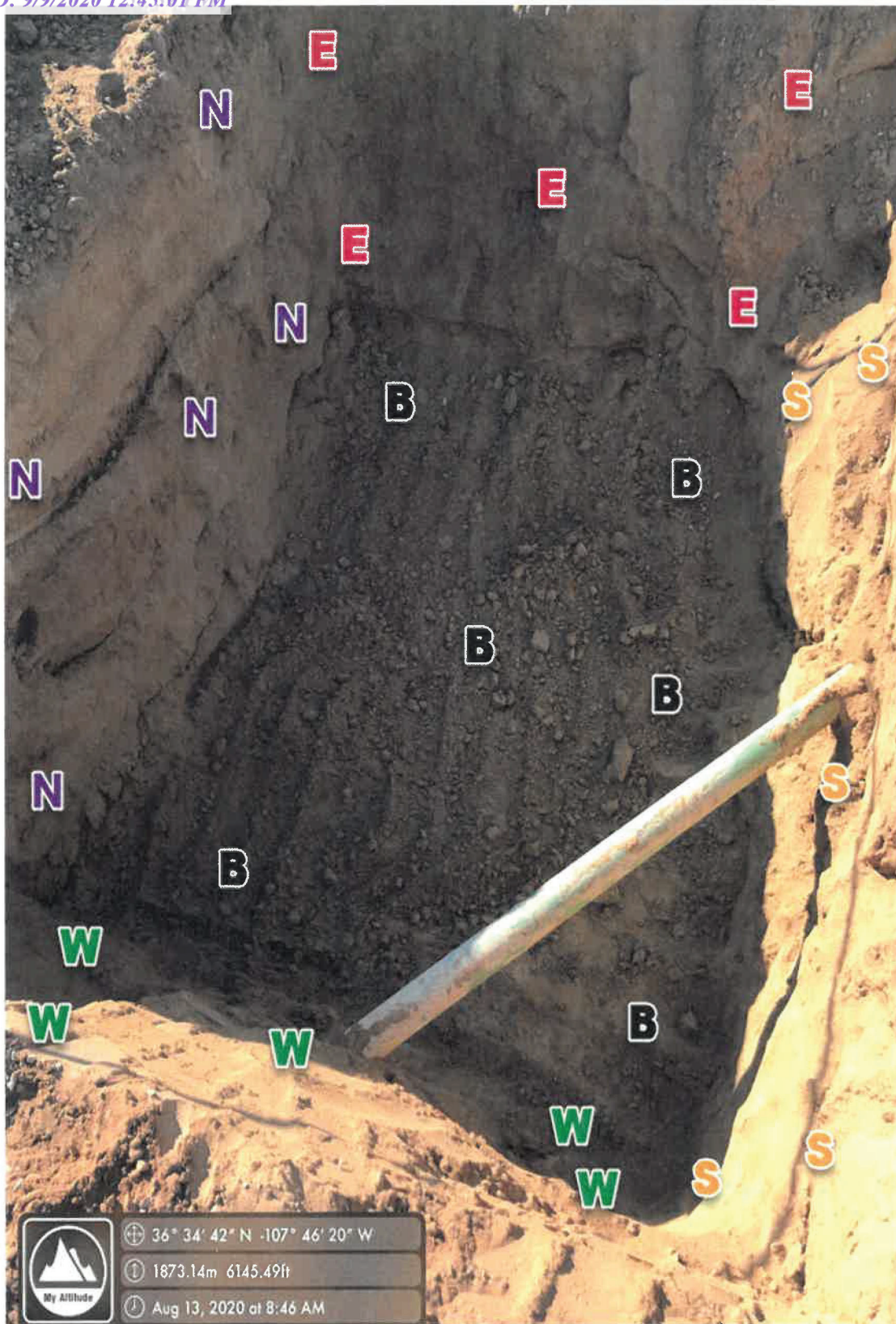
## CLOSURE SAMPLES





8/3/2020





**B** = Bottom 9'

**N** = North Wall

**E** = East Wall

**S** = South Wall

**W** = West Wall

**James McDaniel**

---

**From:** James McDaniel  
**Sent:** Friday, July 24, 2020 12:48 PM  
**To:** 'Smith, Cory, EMNRD'; 'Abiodun Emmanuel Adeloje'; 'Maureen Joe'  
**Cc:** Heather Huntington; David Rogers; Kyle Walter  
**Subject:** RE: Below Grade Tank Closure Notifications

Ladies and Gentlemen,

Please accept this email as the required notification for below grade tank closure activities at the two wells below:

John Charles 2, 30-045-06480, located in Section 13E, Township 27N, Range 9W, San Juan County, New Mexico.

Marshall A 3, 30-045-06536, located in Section 15G, Township 27N, Range 9W, San Juan County, New Mexico.

Closure activities will begin at 10 AM at the Marshall A 3, with the John Charles 2 closure activities taking place immediately following. Thank you for your time in regards to this matter.

*\*Closure activities will take place on Wednesday, July 29, 2020.*

**James McDaniel**  
**HSE Supervisor**  
**Enduring Resources**

CSP #30009

CHMM #15676

CIT #13805

Office: 505-636-9731

Cell: 505-444-3004

[jmcdaniel@enduringresources.com](mailto:jmcdaniel@enduringresources.com)



**From:** James McDaniel  
**Sent:** Friday, July 24, 2020 12:47 PM  
**To:** 'Smith, Cory, EMNRD' <Cory.Smith@state.nm.us>; 'Abiodun Emmanuel Adeloje' <aadeloje@blm.gov>; 'Maureen Joe' <maureen.joe@bia.gov>  
**Cc:** Heather Huntington <Hhuntington@enduringresources.com>; David Rogers <DRogers@enduringresources.com>; Kyle Walter <KWalter@enduringresources.com>  
**Subject:** Below Grade Tank Closure Notifications

Ladies and Gentlemen,

Please accept this email as the required notification for below grade tank closure activities at the two wells below:

John Charles 2, 30-045-06480, located in Section 13E, Township 27N, Range 9W, San Juan County, New Mexico.

Marshall A 3, 30-045-06536, located in Section 15G, Township 27N, Range 9W, San Juan County, New Mexico.

Closure activities will begin at 10 AM at the Marshall A 3, with the John Charles 2 closure activities taking place immediately following. Thank you for your time in regards to this matter.

**James McDaniel**  
**HSE Supervisor**  
**Enduring Resources**  
CSP #30009  
CHMM #15676  
CIT #13805  
Office: 505-636-9731  
Cell: 505-444-3004  
[jmcdaniel@enduringresources.com](mailto:jmcdaniel@enduringresources.com)



**James McDaniel**

---

**From:** James McDaniel  
**Sent:** Friday, July 31, 2020 7:32 AM  
**To:** 'Smith, Cory, EMNRD'; 'Abiodun Emmanuel Adeloye'; 'Maureen Joe'  
**Cc:** Heather Huntington; David Rogers  
**Subject:** Re-Sampling of BGT Closures

The samples collected from below the BGTs at the Marshall A 3 and the John Charles 2 were elevated for DRO/ORO above the 100 ppm TPH requirements in the top 4 feet of soil. Additional excavation will occur on these two locations today, and closure sampling will occur at 10 AM on Monday, +August 3 at the Marshall A 3, with the sampling at the John Charles 2 following immediately afterwards. Thank you.

**James McDaniel**  
**HSE Supervisor**  
**Enduring Resources**  
CSP #30009  
CHMM #15676  
CIT #13805  
Office: 505-636-9731  
Cell: 505-444-3004  
[jmcdaniel@enduringresources.com](mailto:jmcdaniel@enduringresources.com)



**James McDaniel**

---

**From:** James McDaniel  
**Sent:** Tuesday, August 11, 2020 7:26 AM  
**To:** 'Smith, Cory, EMNRD'; 'Abiodun Emmanuel Adeloje'  
**Cc:** 'Maureen Joe'  
**Subject:** Marshall A 3

Gentlemen,

The re-sampling of the BGT closure at the Marshall A 3 returned results above standards for TPH. Additional excavation will take place today, and a re-sampling for closure will occur on Thursday, 8/13/2020 at 8:30 AM. Thank you for your time in regards to this matter.

**James McDaniel**  
**HSE Supervisor**  
**Enduring Resources**  
CSP #30009  
CHMM #15676  
CIT #13805  
Office: 505-636-9731  
Cell: 505-444-3004  
[jmcdaniel@enduringresources.com](mailto:jmcdaniel@enduringresources.com)



**James McDaniel**

---

**From:** James McDaniel  
**Sent:** Friday, August 21, 2020 11:05 AM  
**To:** 'Smith, Cory, EMNRD'; Abiodun Emmanuel Adeloye  
**Cc:** Kyle Walter  
**Subject:** Marshall A 3 BGT Closure  
**Attachments:** Sample Results 8-13-2020.pdf

Two of the samples from the Marshall A 3 failed the 100 ppm TPH standard for this location. The South Wall and the Bottom at 5' below ground surface. Additional excavation will take place on these areas on Monday, August 24, and sampling will occur on Tuesday August 25<sup>th</sup> at 9 AM. Thank you for your time in regards to this matter. Sample results are included for your reference.

**James McDaniel**  
**HSE Supervisor**  
**Enduring Resources**  
CSP #30009  
CHMM #15676  
CIT #13805  
Office: 505-636-9731  
Cell: 505-444-3004  
[jmcdaniel@enduringresources.com](mailto:jmcdaniel@enduringresources.com)





Enduring Resources, LLC  
BGT Closure Report  
Marshall A 3  
30-045-06536



PHOTO 1: Visual Confirmation of Release Occurring During BGT Removal



PHOTO 2: Former BGT Location after Removal (7/29/2020)



Enduring Resources, LLC  
BGT Closure Report  
Marshall A 3  
30-045-06536



PHOTO 3: Excavated Area (8/3/2020)



Enduring Resources, LLC  
BGT Closure Report  
Marshall A 3  
30-045-06536



PHOTO 4: Excavated Area (8/13/2020)



Enduring Resources, LLC  
BGT Closure Report  
Marshall A 3  
30-045-06536

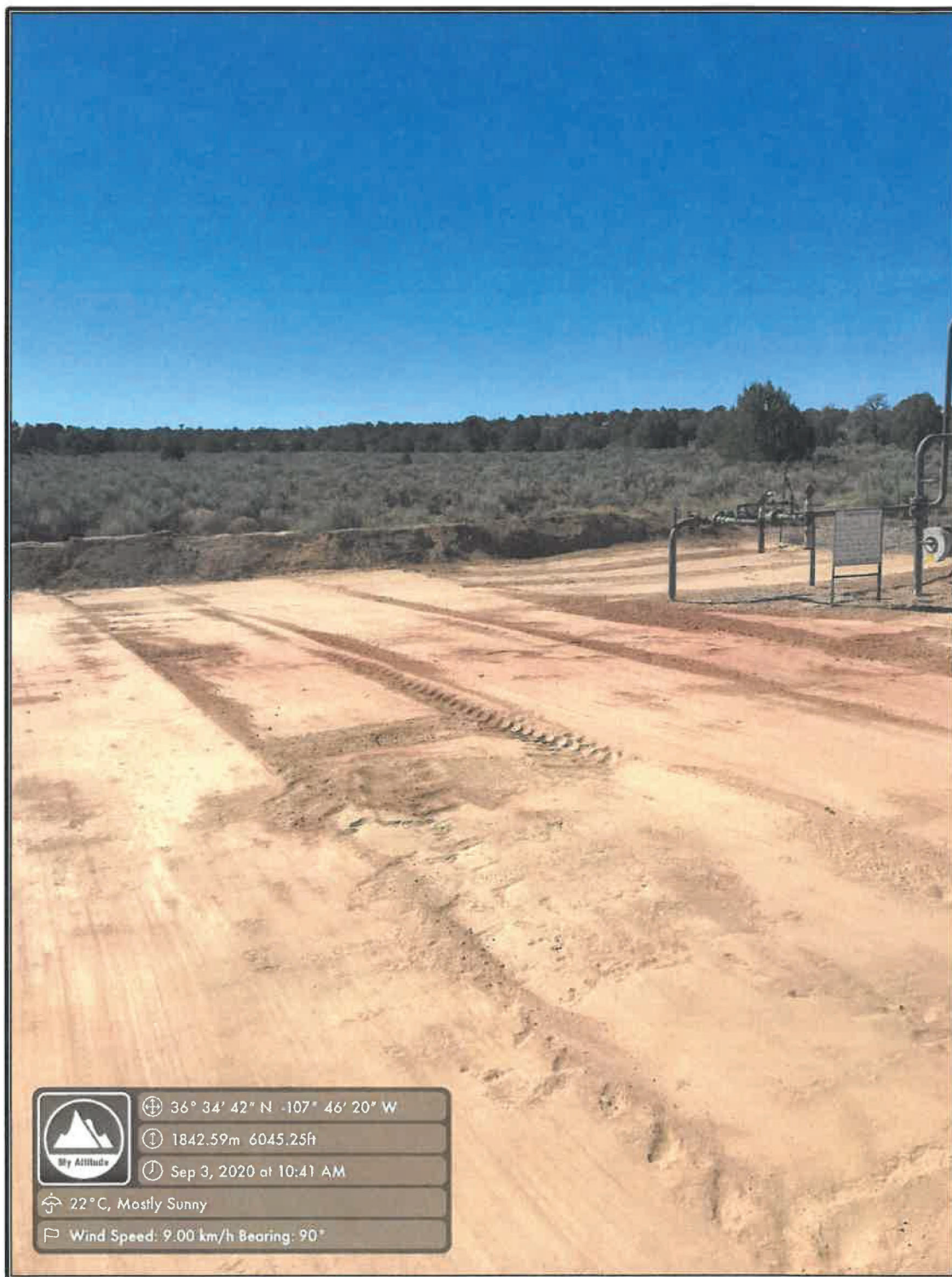


PHOTO 5: BGT Area after Backfill



## Analytical Report

### Report Summary

Client: Enduring Resources, LLC

Samples Received: 7/29/2020

Job Number: 17065-0017

Work Order: P007079

Project Name/Location: Marshall A3

Report Reviewed By:

A handwritten signature in black ink, appearing to read 'Walter Hinchman', is written over a horizontal line.

Date: 7/31/20

Walter Hinchman, Laboratory Director



Envirotech Inc. certifies the test results meet all requirements of TNI unless footnoted otherwise.  
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Enduring Resources, LLC  
511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

Reported:  
07/31/20 10:36

### Sample Summary

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
BGT Composite	P007079-01A	Soil	07/29/20	07/29/20	Glass Jar, 4 oz.

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Enduring Resources, LLC  
511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

Reported:  
07/31/20 10:36

**BGT Composite  
P007079-01 (Solid)**

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
<b><u>Volatile Organics by EPA 8021B</u></b>	mg/kg	mg/kg				Batch: 2031011
Benzene	ND	0.0250	1	07/29/20	07/29/20	
Toluene	ND	0.0250	1	07/29/20	07/29/20	
Ethylbenzene	ND	0.0250	1	07/29/20	07/29/20	
p,m-Xylene	ND	0.0500	1	07/29/20	07/29/20	
o-Xylene	ND	0.0250	1	07/29/20	07/29/20	
Total Xylenes	ND	0.0250	1	07/29/20	07/29/20	
Surrogate: 4-Bromochlorobenzene-PID	103 %	50-150		07/29/20	07/29/20	
<b><u>Nonhalogenated Organics by EPA 8015D - GRO</u></b>	mg/kg	mg/kg				Batch: 2031011
Gasoline Range Organics (C6-C10)	ND	20.0	1	07/29/20	07/29/20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	91.9 %	50-150		07/29/20	07/29/20	
<b><u>Nonhalogenated Organics by EPA 8015D - DRO/ORO</u></b>	mg/kg	mg/kg				Batch: 2031015
Diesel Range Organics (C10-C28)	433	25.0	1	07/29/20	07/29/20	
Oil Range Organics (C28-C40)	1100	50.0	1	07/29/20	07/29/20	
Surrogate: n-Nonane	98.9 %	50-200		07/29/20	07/29/20	
<b><u>Anions by EPA 300.0/9056A</u></b>	mg/kg	mg/kg				Batch: 2031012
Chloride	ND	20.0	1	07/29/20	07/29/20	

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Enduring Resources, LLC  
511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

Reported:  
07/31/20 10:36

### Volatile Organics by EPA 8021B - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	

#### Blank (2031011-BLK1)

Prepared & Analyzed: 07/29/20 1

Benzene	ND	0.0250							
Toluene	ND	0.0250							
Ethylbenzene	ND	0.0250							
p,m-Xylene	ND	0.0500							
o-Xylene	ND	0.0250							
Total Xylenes	ND	0.0250							
Surrogate: 4-Bromochlorobenzene-PID	8.16		8.00		102	50-150			

#### LCS (2031011-BS1)

Prepared & Analyzed: 07/29/20 1

Benzene	5.16	0.0250	5.00		103	70-130			
Toluene	5.18	0.0250	5.00		104	70-130			
Ethylbenzene	5.15	0.0250	5.00		103	70-130			
p,m-Xylene	10.3	0.0500	10.0		103	70-130			
o-Xylene	5.17	0.0250	5.00		103	70-130			
Total Xylenes	15.5	0.0250	15.0		103	0-200			
Surrogate: 4-Bromochlorobenzene-PID	8.54		8.00		107	50-150			

#### Matrix Spike (2031011-MS1)

Source: P007075-01

Prepared & Analyzed: 07/29/20 1

Benzene	4.95	0.0250	5.00	ND	99.0	54.3-133			
Toluene	4.95	0.0250	5.00	ND	99.0	61.4-130			
Ethylbenzene	4.93	0.0250	5.00	ND	98.6	61.4-133			
p,m-Xylene	9.87	0.0500	10.0	ND	98.7	63.3-131			
o-Xylene	4.93	0.0250	5.00	ND	98.6	63.3-131			
Total Xylenes	14.8	0.0250	15.0	ND	98.7	0-200			
Surrogate: 4-Bromochlorobenzene-PID	8.17		8.00		102	50-150			

#### Matrix Spike Dup (2031011-MSD1)

Source: P007075-01

Prepared & Analyzed: 07/29/20 1

Benzene	5.24	0.0250	5.00	ND	105	54.3-133	5.71	20	
Toluene	5.22	0.0250	5.00	ND	104	61.4-130	5.30	20	
Ethylbenzene	5.19	0.0250	5.00	ND	104	61.4-133	5.17	20	
p,m-Xylene	10.4	0.0500	10.0	ND	104	63.3-131	5.12	20	
o-Xylene	5.20	0.0250	5.00	ND	104	63.3-131	5.28	20	
Total Xylenes	15.6	0.0250	15.0	ND	104	0-200	5.17	200	
Surrogate: 4-Bromochlorobenzene-PID	8.20		8.00		102	50-150			

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Enduring Resources, LLC  
511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

Reported:  
07/31/20 10:36

### Nonhalogenated Organics by EPA 8015D - GRO - Quality Control

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	REC %	REC Limits %	RPD %	RPD Limit %	Notes
---------	-----------------	-----------------------------	-------------------------	---------------------------	----------	--------------------	----------	-------------------	-------

#### Blank (2031011-BLK1)

Prepared & Analyzed: 07/29/20 1

Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.51		8.00		93.9	50-150			

#### LCS (2031011-BS2)

Prepared & Analyzed: 07/29/20 1

Gasoline Range Organics (C6-C10)	47.5	20.0	50.0		95.0	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.42		8.00		92.7	50-150			

#### Matrix Spike (2031011-MS2)

Source: P007075-01

Prepared & Analyzed: 07/29/20 1

Gasoline Range Organics (C6-C10)	50.7	20.0	50.0	ND	101	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.58		8.00		94.8	50-150			

#### Matrix Spike Dup (2031011-MSD2)

Source: P007075-01

Prepared & Analyzed: 07/29/20 1

Gasoline Range Organics (C6-C10)	48.8	20.0	50.0	ND	97.6	70-130	3.83	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.51		8.00		93.9	50-150			

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Enduring Resources, LLC	Project Name:	Marshall A3	Reported: 07/31/20 10:36
511 16th Street, Suite 700	Project Number:	17065-0017	
Denver CO, 80202	Project Manager:	James McDaniel	

### Nonhalogenated Organics by EPA 8015D - DRO/ORO - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	

#### Blank (2031015-BLK1)

Prepared &amp; Analyzed: 07/29/20 1

Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C40)	ND	50.0							
Surrogate: n-Nonane	52.4		50.0		105	50-200			

#### LCS (2031015-BS1)

Prepared: 07/29/20 1 Analyzed: 07/29/20 2

Diesel Range Organics (C10-C28)	470	25.0	500		94.1	38-132			
Surrogate: n-Nonane	52.6		50.0		105	50-200			

#### Matrix Spike (2031015-MS1)

Source: P007079-01 Prepared: 07/29/20 1 Analyzed: 07/29/20 2

Diesel Range Organics (C10-C28)	947	25.0	500	433	103	38-132			
Surrogate: n-Nonane	48.8		50.0		97.6	50-200			

#### Matrix Spike Dup (2031015-MSD1)

Source: P007079-01 Prepared: 07/29/20 1 Analyzed: 07/29/20 2

Diesel Range Organics (C10-C28)	984	25.0	500	433	110	38-132	3.83	20	
Surrogate: n-Nonane	48.8		50.0		97.5	50-200			

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Enduring Resources, LLC	Project Name:	Marshall A3	
511 16th Street, Suite 700	Project Number:	17065-0017	Reported:
Denver CO, 80202	Project Manager:	James McDaniel	07/31/20 10:36

## Anions by EPA 300.0/9056A - Quality Control

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	REC %	REC Limits %	RPD %	RPD Limit %	Notes
<b>Blank (2031012-BLK1)</b>					Prepared & Analyzed: 07/29/20 1				
Chloride	ND	20.0							
<b>LCS (2031012-BS1)</b>					Prepared & Analyzed: 07/29/20 1				
Chloride	252	20.0	250		101	90-110			
<b>Matrix Spike (2031012-MS1)</b>					Source: P007075-01 Prepared & Analyzed: 07/29/20 1				
Chloride	353	20.0	250	97.6	102	80-120			
<b>Matrix Spike Dup (2031012-MSD1)</b>					Source: P007075-01 Prepared & Analyzed: 07/29/20 1				
Chloride	353	20.0	250	97.6	102	80-120	0.00283	20	

## QC Summary Report Comment:

Calculations are based off of the raw (non-rounded) data. However, for reporting purposes all QC data is rounded to three significant figures. Therefore, hand calculated values may differ slightly.

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Enduring Resources, LLC  
511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

Reported:  
07/31/20 10:36

#### Notes and Definitions

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

RPD Relative Percent Difference

\*\* Methods marked with \*\* are non-accredited methods.

Soil data is reported on an "as received" weight basis, unless reported otherwise.

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### Project Information

### Chain of Custody

Page 1 of 9

Page 9 of 9

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## Analytical Report

### Report Summary

Client: Enduring Resources, LLC

Samples Received: 8/3/2020

Job Number: 17065-0017

Work Order: P008005

Project Name/Location: Marshall A3

Report Reviewed By:

A handwritten signature in black ink, appearing to read 'Walter Hinchman', is written over a horizontal line.

Date: 8/10/20

Walter Hinchman, Laboratory Director



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Statement of Data Authenticity: Envirotech, Inc. attests the data reported has not been altered in any way.  
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Enduring Resources, LLC  
511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

Reported:  
08/10/20 10:34

### Sample Summary

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
Wall Composite	P008005-01A	Soil	08/03/20	08/03/20	Glass Jar, 4 oz.
Bottom Composite	P008005-02A	Soil	08/03/20	08/03/20	Glass Jar, 4 oz.

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Enduring Resources, LLC  
511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

Reported:  
08/10/20 10:34

**Wall Composite**  
**P008005-01 (Solid)**

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
<b>Volatile Organics by EPA 8021B</b>		mg/kg	mg/kg			Batch: 2032018
Benzene	ND	0.0250	1	08/05/20	08/05/20	
Toluene	ND	0.0250	1	08/05/20	08/05/20	
Ethylbenzene	ND	0.0250	1	08/05/20	08/05/20	
p,m-Xylene	ND	0.0500	1	08/05/20	08/05/20	
o-Xylene	ND	0.0250	1	08/05/20	08/05/20	
Total Xylenes	ND	0.0250	1	08/05/20	08/05/20	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>		100 %	50-150	08/05/20	08/05/20	
<b>Nonhalogenated Organics by EPA 8015D - GRO</b>		mg/kg	mg/kg			Batch: 2032018
Gasoline Range Organics (C6-C10)	ND	20.0	1	08/05/20	08/05/20	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>		88.8 %	50-150	08/05/20	08/05/20	
<b>Nonhalogenated Organics by EPA 8015D - DRO/ORO</b>		mg/kg	mg/kg			Batch: 2032016
Diesel Range Organics (C10-C28)	476	25.0	1	08/05/20	08/05/20	
Oil Range Organics (C28-C40)	1150	50.0	1	08/05/20	08/05/20	
<i>Surrogate: n-Nonane</i>		99.5 %	50-200	08/05/20	08/05/20	
<b>Anions by EPA 300.0/9056A</b>		mg/kg	mg/kg			Batch: 2032017
Chloride	ND	20.0	1	08/05/20	08/05/20	

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Enduring Resources, LLC  
511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

Reported:  
08/10/20 10:34

**Bottom Composite**  
**P008005-02 (Solid)**

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
<b>Volatile Organics by EPA 8021B</b>	mg/kg	mg/kg				Batch: 2032018
Benzene	ND	0.0250	1	08/05/20	08/05/20	
Toluene	ND	0.0250	1	08/05/20	08/05/20	
Ethylbenzene	ND	0.0250	1	08/05/20	08/05/20	
p,m-Xylene	ND	0.0500	1	08/05/20	08/05/20	
o-Xylene	ND	0.0250	1	08/05/20	08/05/20	
Total Xylenes	ND	0.0250	1	08/05/20	08/05/20	
Surrogate: 4-Bromochlorobenzene-PID	96.5 %	50-150		08/05/20	08/05/20	
<b>Nonhalogenated Organics by EPA 8015D - GRO</b>	mg/kg	mg/kg				Batch: 2032018
Gasoline Range Organics (C6-C10)	ND	20.0	1	08/05/20	08/05/20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	92.7 %	50-150		08/05/20	08/05/20	
<b>Nonhalogenated Organics by EPA 8015D - DRO/ORO</b>	mg/kg	mg/kg				Batch: 2032016
Diesel Range Organics (C10-C28)	38.0	25.0	1	08/05/20	08/05/20	
Oil Range Organics (C28-C40)	89.1	50.0	1	08/05/20	08/05/20	
Surrogate: n-Nonane	91.3 %	50-200		08/05/20	08/05/20	
<b>Anions by EPA 300.0/9056A</b>	mg/kg	mg/kg				Batch: 2032017
Chloride	ND	20.0	1	08/05/20	08/05/20	

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Enduring Resources, LLC	Project Name:	Marshall A3	
511 16th Street, Suite 700	Project Number:	17065-0017	Reported:
Denver CO, 80202	Project Manager:	James McDaniel	08/10/20 10:34

## Volatile Organics by EPA 8021B - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	

## Blank (2032018-BLK1)

Prepared: 08/05/20 0 Analyzed: 08/05/20 1

Benzene	ND	0.0250							
Toluene	ND	0.0250							
Ethylbenzene	ND	0.0250							
p,m-Xylene	ND	0.0500							
o-Xylene	ND	0.0250							
Total Xylenes	ND	0.0250							
Surrogate: 4-Bromochlorobenzene-PID	8.12		8.00		102	50-150			

## LCS (2032018-BS1)

Prepared: 08/05/20 0 Analyzed: 08/05/20 1

Benzene	5.42	0.0250	5.00		108	70-130			
Toluene	5.43	0.0250	5.00		109	70-130			
Ethylbenzene	5.40	0.0250	5.00		108	70-130			
p,m-Xylene	10.8	0.0500	10.0		108	70-130			
o-Xylene	5.43	0.0250	5.00		109	70-130			
Total Xylenes	16.2	0.0250	15.0		108	0-200			
Surrogate: 4-Bromochlorobenzene-PID	8.41		8.00		105	50-150			

## Matrix Spike (2032018-MS1)

Source: P008005-01

Prepared: 08/05/20 0 Analyzed: 08/05/20 1

Benzene	5.36	0.0250	5.00	ND	107	54.3-133			
Toluene	5.37	0.0250	5.00	ND	107	61.4-130			
Ethylbenzene	5.34	0.0250	5.00	ND	107	61.4-133			
p,m-Xylene	10.7	0.0500	10.0	ND	107	63.3-131			
o-Xylene	5.37	0.0250	5.00	ND	107	63.3-131			
Total Xylenes	16.1	0.0250	15.0	ND	107	0-200			
Surrogate: 4-Bromochlorobenzene-PID	8.33		8.00		104	50-150			

## Matrix Spike Dup (2032018-MSD1)

Source: P008005-01

Prepared: 08/05/20 0 Analyzed: 08/05/20 1

Benzene	5.22	0.0250	5.00	ND	104	54.3-133	2.71	20	
Toluene	5.20	0.0250	5.00	ND	104	61.4-130	3.17	20	
Ethylbenzene	5.17	0.0250	5.00	ND	103	61.4-133	3.38	20	
p,m-Xylene	10.3	0.0500	10.0	ND	103	63.3-131	3.44	20	
o-Xylene	5.19	0.0250	5.00	ND	104	63.3-131	3.37	20	
Total Xylenes	15.5	0.0250	15.0	ND	104	0-200	3.41	200	
Surrogate: 4-Bromochlorobenzene-PID	8.10		8.00		101	50-150			

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Enduring Resources, LLC  
511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

Reported:  
08/10/20 10:34

### Nonhalogenated Organics by EPA 8015D - GRO - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	

#### Blank (2032018-BLK1)

Prepared: 08/05/20 0 Analyzed: 08/05/20 1

Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.16		8.00		89.5	50-150			

#### LCS (2032018-BS2)

Prepared: 08/05/20 0 Analyzed: 08/05/20 1

Gasoline Range Organics (C6-C10)	45.6	20.0	50.0		91.2	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.29		8.00		91.1	50-150			

#### Matrix Spike (2032018-MS2)

Source: P008005-01 Prepared: 08/05/20 0 Analyzed: 08/05/20 1

Gasoline Range Organics (C6-C10)	43.9	20.0	50.0	ND	87.8	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.36		8.00		91.9	50-150			

#### Matrix Spike Dup (2032018-MSD2)

Source: P008005-01 Prepared: 08/05/20 0 Analyzed: 08/05/20 1

Gasoline Range Organics (C6-C10)	44.8	20.0	50.0	ND	89.6	70-130	2.06	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.22		8.00		90.2	50-150			

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Enduring Resources, LLC	Project Name:	Marshall A3	
511 16th Street, Suite 700	Project Number:	17065-0017	Reported:
Denver CO, 80202	Project Manager:	James McDaniel	08/10/20 10:34

### Nonhalogenated Organics by EPA 8015D - DRO/ORO - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	

#### Blank (2032016-BLK1)

Prepared: 08/05/20 0 Analyzed: 08/05/20 1

Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C40)	ND	50.0							
Surrogate: n-Nonane	45.7		50.0		91.3	50-200			

#### LCS (2032016-BS1)

Prepared: 08/05/20 0 Analyzed: 08/05/20 1

Diesel Range Organics (C10-C28)	439	25.0	500		87.9	38-132			
Surrogate: n-Nonane	47.3		50.0		94.6	50-200			

#### Matrix Spike (2032016-MS1)

Source: P007096-01

Prepared: 08/05/20 0 Analyzed: 08/05/20 1

Diesel Range Organics (C10-C28)	2130	125	500	1430	141	38-132			M2
Surrogate: n-Nonane	68.2		50.0		136	50-200			

#### Matrix Spike Dup (2032016-MSD1)

Source: P007096-01

Prepared: 08/05/20 0 Analyzed: 08/05/20 1

Diesel Range Organics (C10-C28)	2030	125	500	1430	120	38-132	5.02	20	
Surrogate: n-Nonane	63.9		50.0		128	50-200			

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Enduring Resources, LLC  
511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

Reported:  
08/10/20 10:34

### Anions by EPA 300.0/9056A - Quality Control

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	REC %	REC Limits %	RPD %	RPD Limit %	Notes
<b>Blank (2032017-BLK1)</b>					Prepared: 08/05/20 0 Analyzed: 08/05/20 1				
Chloride	ND	20.0							
<b>LCS (2032017-BS1)</b>					Prepared: 08/05/20 0 Analyzed: 08/05/20 1				
Chloride	271	20.0	250		108	90-110			
<b>Matrix Spike (2032017-MS1)</b>					Source: P008005-01 Prepared: 08/05/20 0 Analyzed: 08/05/20 1				
Chloride	257	20.0	250	ND	103	80-120			
<b>Matrix Spike Dup (2032017-MSD1)</b>					Source: P008005-01 Prepared: 08/05/20 0 Analyzed: 08/05/20 1				
Chloride	250	20.0	250	ND	100	80-120	2.73	20	

#### QC Summary Report Comment:

Calculations are based off of the raw (non-rounded) data. However, for reporting purposes all QC data is rounded to three significant figures. Therefore, hand calculated values may differ slightly.

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Enduring Resources, LLC  
511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

**Reported:**  
08/10/20 10:34

#### Notes and Definitions

M2 Matrix spike recovery was outside quality control limits. The associated LCS spike recovery was acceptable.

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

RPD Relative Percent Difference

\*\* Methods marked with \*\* are non-accredited methods.

Soil data is reported on an "as received" weight basis, unless reported otherwise.

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### Project Information

### Chain of Custody

Page 1 of 1

[illegible]

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## Analytical Report

### Report Summary

Client: Enduring Resources, LLC

Samples Received: 8/13/2020

Job Number: 17065-0017

Work Order: P008036

Project Name/Location: Marshall A3

Report Reviewed By:

A handwritten signature in black ink, appearing to read 'Walter Hinchman', is written over a horizontal line.

Date: 8/20/20

Walter Hinchman, Laboratory Director



Envirotech Inc. certifies the test results meet all requirements of TNI unless footnoted otherwise.  
Statement of Data Authenticity: Envirotech, Inc. attests the data reported has not been altered in any way.  
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Envirotech, Inc. holds the Utah TNI certification NM009792018-1 for the data reported.  
Envirotech, Inc. holds the Texas TNI certification T104704557-19-2 for the data reported.





Enduring Resources, LLC  
511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

Reported:  
08/20/20 14:16

### Sample Summary

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
South Wall	P008036-01A	Soil	08/13/20	08/13/20	Glass Jar, 4 oz.
East Wall	P008036-02A	Soil	08/13/20	08/13/20	Glass Jar, 4 oz.
West Wall	P008036-03A	Soil	08/13/20	08/13/20	Glass Jar, 4 oz.
North Wall	P008036-04A	Soil	08/13/20	08/13/20	Glass Jar, 4 oz.
Bottom @ 5'	P008036-05A	Soil	08/13/20	08/13/20	Glass Jar, 4 oz.

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511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

Reported:  
08/20/20 14:16

**South Wall**  
**P008036-01 (Solid)**

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
<b>Volatile Organics by EPA 8021B</b>		mg/kg	mg/kg			Batch: 2033033
Benzene	ND	0.0250	1	08/14/20	08/14/20	
Toluene	ND	0.0250	1	08/14/20	08/14/20	
Ethylbenzene	ND	0.0250	1	08/14/20	08/14/20	
p,m-Xylene	ND	0.0500	1	08/14/20	08/14/20	
o-Xylene	ND	0.0250	1	08/14/20	08/14/20	
Total Xylenes	ND	0.0250	1	08/14/20	08/14/20	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>		101 %	50-150	08/14/20	08/14/20	
<b>Nonhalogenated Organics by EPA 8015D - GRO</b>		mg/kg	mg/kg			Batch: 2033033
Gasoline Range Organics (C6-C10)	ND	20.0	1	08/14/20	08/14/20	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>		92.9 %	50-150	08/14/20	08/14/20	
<b>Nonhalogenated Organics by EPA 8015D - DRO/ORO</b>		mg/kg	mg/kg			Batch: 2033038
Diesel Range Organics (C10-C28)	391	25.0	1	08/14/20	08/14/20	
Oil Range Organics (C28-C40)	977	50.0	1	08/14/20	08/14/20	
<i>Surrogate: n-Nonane</i>		103 %	50-200	08/14/20	08/14/20	
<b>Anions by EPA 300.0/9056A</b>		mg/kg	mg/kg			Batch: 2034004
Chloride	ND	20.0	1	08/17/20	08/17/20	

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Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

Reported:  
08/20/20 14:16

**East Wall**  
**P008036-02 (Solid)**

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
<b>Volatile Organics by EPA 8021B</b>		mg/kg	mg/kg			Batch: 2033033
Benzene	ND	0.0250	1	08/14/20	08/14/20	
Toluene	ND	0.0250	1	08/14/20	08/14/20	
Ethylbenzene	ND	0.0250	1	08/14/20	08/14/20	
p,m-Xylene	ND	0.0500	1	08/14/20	08/14/20	
o-Xylene	ND	0.0250	1	08/14/20	08/14/20	
Total Xylenes	ND	0.0250	1	08/14/20	08/14/20	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>		100 %	50-150	08/14/20	08/14/20	
<b>Nonhalogenated Organics by EPA 8015D - GRO</b>		mg/kg	mg/kg			Batch: 2033033
Gasoline Range Organics (C6-C10)	ND	20.0	1	08/14/20	08/14/20	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>		92.5 %	50-150	08/14/20	08/14/20	
<b>Nonhalogenated Organics by EPA 8015D - DRO/ORO</b>		mg/kg	mg/kg			Batch: 2033038
Diesel Range Organics (C10-C28)	ND	25.0	1	08/14/20	08/18/20	
Oil Range Organics (C28-C40)	ND	50.0	1	08/14/20	08/18/20	
<i>Surrogate: n-Nonane</i>		97.6 %	50-200	08/14/20	08/18/20	
<b>Anions by EPA 300.0/9056A</b>		mg/kg	mg/kg			Batch: 2034004
Chloride	ND	20.0	1	08/17/20	08/17/20	

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511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

Reported:  
08/20/20 14:16

**West Wall**  
**P008036-03 (Solid)**

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
<b>Volatile Organics by EPA 8021B</b>		mg/kg	mg/kg			Batch: 2033033
Benzene	ND	0.0250	1	08/14/20	08/14/20	
Toluene	ND	0.0250	1	08/14/20	08/14/20	
Ethylbenzene	ND	0.0250	1	08/14/20	08/14/20	
p,m-Xylene	ND	0.0500	1	08/14/20	08/14/20	
o-Xylene	ND	0.0250	1	08/14/20	08/14/20	
Total Xylenes	ND	0.0250	1	08/14/20	08/14/20	
Surrogate: 4-Bromochlorobenzene-PID		102 %	50-150	08/14/20	08/14/20	
<b>Nonhalogenated Organics by EPA 8015D - GRO</b>		mg/kg	mg/kg			Batch: 2033033
Gasoline Range Organics (C6-C10)	ND	20.0	1	08/14/20	08/14/20	
Surrogate: 1-Chloro-4-fluorobenzene-FID		92.5 %	50-150	08/14/20	08/14/20	
<b>Nonhalogenated Organics by EPA 8015D - DRO/ORO</b>		mg/kg	mg/kg			Batch: 2033038
Diesel Range Organics (C10-C28)	ND	25.0	1	08/14/20	08/14/20	
Oil Range Organics (C28-C40)	ND	50.0	1	08/14/20	08/14/20	
Surrogate: n-Nonane		98.5 %	50-200	08/14/20	08/14/20	
<b>Anions by EPA 300.0/9056A</b>		mg/kg	mg/kg			Batch: 2034004
Chloride	ND	20.0	1	08/17/20	08/17/20	

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511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

Reported:  
08/20/20 14:16

**North Wall**  
**P008036-04 (Solid)**

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
<b>Volatile Organics by EPA 8021B</b>		mg/kg	mg/kg			Batch: 2033033
Benzene	ND	0.0250	1	08/14/20	08/14/20	
Toluene	ND	0.0250	1	08/14/20	08/14/20	
Ethylbenzene	ND	0.0250	1	08/14/20	08/14/20	
p,m-Xylene	ND	0.0500	1	08/14/20	08/14/20	
o-Xylene	ND	0.0250	1	08/14/20	08/14/20	
Total Xylenes	ND	0.0250	1	08/14/20	08/14/20	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>		103 %	50-150	08/14/20	08/14/20	
<b>Nonhalogenated Organics by EPA 8015D - GRO</b>		mg/kg	mg/kg			Batch: 2033033
Gasoline Range Organics (C6-C10)	ND	20.0	1	08/14/20	08/14/20	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>		90.6 %	50-150	08/14/20	08/14/20	
<b>Nonhalogenated Organics by EPA 8015D - DRO/ORO</b>		mg/kg	mg/kg			Batch: 2033038
Diesel Range Organics (C10-C28)	ND	25.0	1	08/14/20	08/14/20	
Oil Range Organics (C28-C40)	ND	50.0	1	08/14/20	08/14/20	
<i>Surrogate: n-Nonane</i>		103 %	50-200	08/14/20	08/14/20	
<b>Anions by EPA 300.0/9056A</b>		mg/kg	mg/kg			Batch: 2034004
Chloride	ND	20.0	1	08/17/20	08/17/20	

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Enduring Resources, LLC  
511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

Reported:  
08/20/20 14:16

**Bottom @ 5'**  
**P008036-05 (Solid)**

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
<b>Volatile Organics by EPA 8021B</b>	mg/kg	mg/kg				Batch: 2033033
Benzene	ND	0.0250	1	08/14/20	08/14/20	
Toluene	ND	0.0250	1	08/14/20	08/14/20	
Ethylbenzene	ND	0.0250	1	08/14/20	08/14/20	
p,m-Xylene	ND	0.0500	1	08/14/20	08/14/20	
o-Xylene	ND	0.0250	1	08/14/20	08/14/20	
Total Xylenes	ND	0.0250	1	08/14/20	08/14/20	
Surrogate: 4-Bromochlorobenzene-PID	100 %	50-150		08/14/20	08/14/20	
<b>Nonhalogenated Organics by EPA 8015D - GRO</b>	mg/kg	mg/kg				Batch: 2033033
Gasoline Range Organics (C6-C10)	ND	20.0	1	08/14/20	08/14/20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	95.5 %	50-150		08/14/20	08/14/20	
<b>Nonhalogenated Organics by EPA 8015D - DRO/ORO</b>	mg/kg	mg/kg				Batch: 2033038
Diesel Range Organics (C10-C28)	32.0	25.0	1	08/14/20	08/14/20	
Oil Range Organics (C28-C40)	78.4	50.0	1	08/14/20	08/14/20	
Surrogate: n-Nonane	103 %	50-200		08/14/20	08/14/20	
<b>Anions by EPA 300.0/9056A</b>	mg/kg	mg/kg				Batch: 2034004
Chloride	ND	20.0	1	08/17/20	08/17/20	

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Enduring Resources, LLC  
511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

Reported:  
08/20/20 14:16

### Volatile Organics by EPA 8021B - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	

#### Blank (2033033-BLK1)

Prepared: 08/14/20 0 Analyzed: 08/14/20 1

Benzene	ND	0.0250							
Toluene	ND	0.0250							
Ethylbenzene	ND	0.0250							
p,m-Xylene	ND	0.0500							
o-Xylene	ND	0.0250							
Total Xylenes	ND	0.0250							
Surrogate: 4-Bromochlorobenzene-PID	8.30		8.00		104	50-150			

#### LCS (2033033-BS1)

Prepared: 08/14/20 0 Analyzed: 08/14/20 1

Benzene	5.33	0.0250	5.00		107	70-130			
Toluene	5.40	0.0250	5.00		108	70-130			
Ethylbenzene	5.40	0.0250	5.00		108	70-130			
p,m-Xylene	10.8	0.0500	10.0		108	70-130			
o-Xylene	5.43	0.0250	5.00		109	70-130			
Total Xylenes	16.2	0.0250	15.0		108	70-130			
Surrogate: 4-Bromochlorobenzene-PID	8.39		8.00		105	50-150			

#### Matrix Spike (2033033-MS1)

Source: P008036-01 Prepared: 08/14/20 0 Analyzed: 08/14/20 1

Benzene	5.21	0.0250	5.00	ND	104	54-133			
Toluene	5.29	0.0250	5.00	ND	106	61-130			
Ethylbenzene	5.29	0.0250	5.00	ND	106	61-133			
p,m-Xylene	10.6	0.0500	10.0	ND	106	63-131			
o-Xylene	5.32	0.0250	5.00	ND	106	63-131			
Total Xylenes	15.9	0.0250	15.0	ND	106	63-131			
Surrogate: 4-Bromochlorobenzene-PID	8.31		8.00		104	50-150			

#### Matrix Spike Dup (2033033-MSD1)

Source: P008036-01 Prepared: 08/14/20 0 Analyzed: 08/14/20 1

Benzene	5.37	0.0250	5.00	ND	107	54-133	3.12	20	
Toluene	5.43	0.0250	5.00	ND	109	61-130	2.52	20	
Ethylbenzene	5.42	0.0250	5.00	ND	108	61-133	2.35	20	
p,m-Xylene	10.8	0.0500	10.0	ND	108	63-131	2.24	20	
o-Xylene	5.45	0.0250	5.00	ND	109	63-131	2.55	20	
Total Xylenes	16.3	0.0250	15.0	ND	109	63-131	2.35	20	
Surrogate: 4-Bromochlorobenzene-PID	8.29		8.00		104	50-150			

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Enduring Resources, LLC  
511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

Reported:  
08/20/20 14:16

### Nonhalogenated Organics by EPA 8015D - GRO - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	

#### Blank (2033033-BLK1)

Prepared: 08/14/20 0 Analyzed: 08/14/20 1

Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.37		8.00		92.1	50-150			

#### LCS (2033033-BS2)

Prepared: 08/14/20 0 Analyzed: 08/14/20 1

Gasoline Range Organics (C6-C10)	48.6	20.0	50.0		97.1	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.35		8.00		91.9	50-150			

#### Matrix Spike (2033033-MS2)

Source: P008036-01 Prepared: 08/14/20 0 Analyzed: 08/14/20 1

Gasoline Range Organics (C6-C10)	48.8	20.0	50.0	ND	97.7	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.47		8.00		93.3	50-150			

#### Matrix Spike Dup (2033033-MSD2)

Source: P008036-01 Prepared: 08/14/20 0 Analyzed: 08/14/20 1

Gasoline Range Organics (C6-C10)	49.0	20.0	50.0	ND	97.9	70-130	0.271	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.35		8.00		91.9	50-150			

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Enduring Resources, LLC	Project Name:	Marshall A3	
511 16th Street, Suite 700	Project Number:	17065-0017	Reported:
Denver CO, 80202	Project Manager:	James McDaniel	08/20/20 14:16

### Nonhalogenated Organics by EPA 8015D - DRO/ORO - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	

#### Blank (2033038-BLK1)

Prepared: 08/14/20 0 Analyzed: 08/14/20 1

Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C40)	ND	50.0							
Surrogate: n-Nonane	59.6		50.0		119	50-200			

#### LCS (2033038-BS1)

Prepared: 08/14/20 0 Analyzed: 08/14/20 1

Diesel Range Organics (C10-C28)	491	25.0	500		98.2	38-132			
Surrogate: n-Nonane	56.0		50.0		112	50-200			

#### Matrix Spike (2033038-MS1)

Source: P008036-01 Prepared: 08/14/20 0 Analyzed: 08/14/20 2

Diesel Range Organics (C10-C28)	849	25.0	500	391	91.5	38-132			
Surrogate: n-Nonane	50.4		50.0		101	50-200			

#### Matrix Spike Dup (2033038-MSD1)

Source: P008036-01 Prepared: 08/14/20 0 Analyzed: 08/14/20 2

Diesel Range Organics (C10-C28)	1100	25.0	500	391	141	38-132	25.6	20	M2, R2
Surrogate: n-Nonane	51.4		50.0		103	50-200			

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Enduring Resources, LLC	Project Name:	Marshall A3	
511 16th Street, Suite 700	Project Number:	17065-0017	Reported:
Denver CO, 80202	Project Manager:	James McDaniel	08/20/20 14:16

## Anions by EPA 300.0/9056A - Quality Control

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	REC % %	REC Limits %	RPD % %	RPD Limit %	Notes
<b>Blank (2034004-BLK1)</b>					Prepared & Analyzed: 08/17/20 1				
Chloride	ND	20.0							
<b>LCS (2034004-BS1)</b>					Prepared & Analyzed: 08/17/20 1				
Chloride	247	20.0	250		98.8	90-110			
<b>Matrix Spike (2034004-MS1)</b>					Source: P008036-01 Prepared & Analyzed: 08/17/20 1				
Chloride	249	20.0	250	ND	99.5	80-120			
<b>Matrix Spike Dup (2034004-MSD1)</b>					Source: P008036-01 Prepared & Analyzed: 08/17/20 1				
Chloride	249	20.0	250	ND	99.4	80-120	0.0121	20	

## QC Summary Report Comment:

Calculations are based off of the raw (non-rounded) data. However, for reporting purposes all QC data is rounded to three significant figures. Therefore, hand calculated values may differ slightly.

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Enduring Resources, LLC	Project Name:	Marshall A3	
511 16th Street, Suite 700	Project Number:	17065-0017	<b>Reported:</b>
Denver CO, 80202	Project Manager:	James McDaniel	08/20/20 14:16

#### Notes and Definitions

- R2 The RPD exceeded the acceptance limit.
- M2 Matrix spike recovery was outside quality control limits. The associated LCS spike recovery was acceptable.
- ND Analyte NOT DETECTED at or above the reporting limit
- NR Not Reported
- RPD Relative Percent Difference
- \*\* Methods marked with \*\* are non-accredited methods.

Soil data is reported on an "as received" weight basis, unless reported otherwise.

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### Chain of Custody

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24 Hour Emergency Response Phone (800) 362-1879

Ph (305) 632-1881 Fax (305) 632-1855

1. **Prüfungsausschuss**  
 2. **Prüfungsausschuss**



## Analytical Report

### Report Summary

Client: Enduring Resources, LLC

Samples Received: 8/25/2020

Job Number: 17065-0017

Work Order: P008084

Project Name/Location: Marshall A3

Report Reviewed By:

A handwritten signature in black ink, appearing to read 'Walter Hinchman', is written over a horizontal line.

Date: 8/27/20

Walter Hinchman, Laboratory Director



Envirotech Inc. certifies the test results meet all requirements of TNI unless footnoted otherwise.  
Statement of Data Authenticity: Envirotech, Inc. attests the data reported has not been altered in any way.  
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Envirotech, Inc. holds the Utah TNI certification NM009792018-1 for the data reported.  
Envirotech, Inc. holds the Texas TNI certification T104704557-19-2 for the data reported.





Enduring Resources, LLC  
511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

**Reported:**  
08/27/20 12:27

### Sample Summary

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
Bottom 9'	P008084-01A	Soil	08/25/20	08/25/20	Glass Jar, 4 oz.
South Wall	P008084-02A	Soil	08/25/20	08/25/20	Glass Jar, 4 oz.

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Enduring Resources, LLC  
511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

Reported:  
08/27/20 12:27

**Bottom 9'**  
**P008084-01 (Solid)**

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
<b>Volatile Organics by EPA 8021B</b>	mg/kg	mg/kg				Batch: 2035018
Benzene	ND	0.0250	1	08/25/20	08/26/20	
Toluene	ND	0.0250	1	08/25/20	08/26/20	
Ethylbenzene	ND	0.0250	1	08/25/20	08/26/20	
p,m-Xylene	ND	0.0500	1	08/25/20	08/26/20	
o-Xylene	ND	0.0250	1	08/25/20	08/26/20	
Total Xylenes	ND	0.0250	1	08/25/20	08/26/20	
Surrogate: 4-Bromochlorobenzene-PID	98.8 %	50-150		08/25/20	08/26/20	
<b>Nonhalogenated Organics by EPA 8015D - GRO</b>	mg/kg	mg/kg				Batch: 2035018
Gasoline Range Organics (C6-C10)	ND	20.0	1	08/25/20	08/26/20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	89.2 %	50-150		08/25/20	08/26/20	
<b>Nonhalogenated Organics by EPA 8015D - DRO/ORO</b>	mg/kg	mg/kg				Batch: 2035016
Diesel Range Organics (C10-C28)	ND	25.0	1	08/25/20	08/25/20	
Oil Range Organics (C28-C40)	ND	50.0	1	08/25/20	08/25/20	
Surrogate: n-Nonane	95.6 %	50-200		08/25/20	08/25/20	
<b>Anions by EPA 300.0/9056A</b>	mg/kg	mg/kg				Batch: 2035017
Chloride	ND	20.0	1	08/25/20	08/26/20	

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Enduring Resources, LLC  
511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

Reported:  
08/27/20 12:27

**South Wall**  
**P008084-02 (Solid)**

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
<b>Volatile Organics by EPA 8021B</b>		mg/kg	mg/kg			Batch: 2035018
Benzene	ND	0.0250	1	08/25/20	08/26/20	
Toluene	ND	0.0250	1	08/25/20	08/26/20	
Ethylbenzene	ND	0.0250	1	08/25/20	08/26/20	
p,m-Xylene	ND	0.0500	1	08/25/20	08/26/20	
o-Xylene	ND	0.0250	1	08/25/20	08/26/20	
Total Xylenes	ND	0.0250	1	08/25/20	08/26/20	
Surrogate: 4-Bromochlorobenzene-PID		101 %	50-150	08/25/20	08/26/20	
<b>Nonhalogenated Organics by EPA 8015D - GRO</b>		mg/kg	mg/kg			Batch: 2035018
Gasoline Range Organics (C6-C10)	ND	20.0	1	08/25/20	08/26/20	
Surrogate: 1-Chloro-4-fluorobenzene-FID		89.3 %	50-150	08/25/20	08/26/20	
<b>Nonhalogenated Organics by EPA 8015D - DRO/ORO</b>		mg/kg	mg/kg			Batch: 2035016
Diesel Range Organics (C10-C28)	ND	25.0	1	08/25/20	08/25/20	
Oil Range Organics (C28-C40)	ND	50.0	1	08/25/20	08/25/20	
Surrogate: n-Nonane		98.1 %	50-200	08/25/20	08/25/20	
<b>Anions by EPA 300.0/9056A</b>		mg/kg	mg/kg			Batch: 2035017
Chloride	ND	20.0	1	08/25/20	08/26/20	

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Enduring Resources, LLC  
511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

Reported:  
08/27/20 12:27

### Volatile Organics by EPA 8021B - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	

#### Blank (2035018-BLK1)

Prepared: 08/25/20 1 Analyzed: 08/26/20 1

Benzene	ND	0.0250							
Toluene	ND	0.0250							
Ethylbenzene	ND	0.0250							
p,m-Xylene	ND	0.0500							
o-Xylene	ND	0.0250							
Total Xylenes	ND	0.0250							
Surrogate: 4-Bromochlorobenzene-PID	7.68		8.00		96.0	50-150			

#### LCS (2035018-BS1)

Prepared: 08/25/20 1 Analyzed: 08/26/20 1

Benzene	4.69	0.0250	5.00		93.8	70-130			
Toluene	4.69	0.0250	5.00		93.8	70-130			
Ethylbenzene	4.67	0.0250	5.00		93.3	70-130			
p,m-Xylene	9.36	0.0500	10.0		93.6	70-130			
o-Xylene	4.70	0.0250	5.00		94.1	70-130			
Total Xylenes	14.1	0.0250	15.0		93.8	70-130			
Surrogate: 4-Bromochlorobenzene-PID	7.98		8.00		99.7	50-150			

#### Matrix Spike (2035018-MS1)

Source: P008083-01 Prepared: 08/25/20 1 Analyzed: 08/26/20 2

Benzene	5.29	0.0250	5.00	ND	106	54-133			
Toluene	5.38	0.0250	5.00	0.135	105	61-130			
Ethylbenzene	6.09	0.0250	5.00	1.12	99.3	61-133			
p,m-Xylene	10.8	0.0500	10.0	0.969	98.0	63-131			
o-Xylene	5.52	0.0250	5.00	0.542	99.6	63-131			
Total Xylenes	16.3	0.0250	15.0	1.51	98.6	63-131			
Surrogate: 4-Bromochlorobenzene-PID	8.78		8.00		110	50-150			

#### Matrix Spike Dup (2035018-MSD1)

Source: P008083-01 Prepared: 08/25/20 1 Analyzed: 08/26/20 2

Benzene	4.90	0.0250	5.00	ND	97.9	54-133	7.70	20	
Toluene	4.97	0.0250	5.00	0.135	96.8	61-130	7.81	20	
Ethylbenzene	5.68	0.0250	5.00	1.12	91.1	61-133	6.91	20	
p,m-Xylene	9.95	0.0500	10.0	0.969	89.8	63-131	7.93	20	
o-Xylene	5.10	0.0250	5.00	0.542	91.2	63-131	7.89	20	
Total Xylenes	15.1	0.0250	15.0	1.51	90.3	63-131	7.92	20	
Surrogate: 4-Bromochlorobenzene-PID	8.68		8.00		109	50-150			

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Enduring Resources, LLC	Project Name:	Marshall A3	
511 16th Street, Suite 700	Project Number:	17065-0017	Reported:
Denver CO, 80202	Project Manager:	James McDaniel	08/27/20 12:27

### Nonhalogenated Organics by EPA 8015D - GRO - Quality Control

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	REC %	REC Limits %	RPD %	RPD Limit %	Notes
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#### Blank (2035018-BLK1)

Prepared: 08/25/20 1 Analyzed: 08/26/20 1

Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.28		8.00		91.0	50-150			

#### LCS (2035018-BS2)

Prepared: 08/25/20 1 Analyzed: 08/26/20 1

Gasoline Range Organics (C6-C10)	43.6	20.0	50.0		87.1	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.21		8.00		90.1	50-150			

#### Matrix Spike (2035018-MS2)

Source: P008083-01

Prepared: 08/25/20 1 Analyzed: 08/26/20 2

Gasoline Range Organics (C6-C10)	90.5	20.0	50.0	46.6	87.9	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.56		8.00		94.4	50-150			

#### Matrix Spike Dup (2035018-MSD2)

Source: P008083-01

Prepared: 08/25/20 1 Analyzed: 08/26/20 2

Gasoline Range Organics (C6-C10)	81.8	20.0	50.0	46.6	70.5	70-130	10.1	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.45		8.00		93.1	50-150			

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Enduring Resources, LLC	Project Name:	Marshall A3	
511 16th Street, Suite 700	Project Number:	17065-0017	Reported:
Denver CO, 80202	Project Manager:	James McDaniel	08/27/20 12:27

### Nonhalogenated Organics by EPA 8015D - DRO/ORO - Quality Control

Analyte	Result	Reporting Limit	Spike Level	Source Result	REC	REC Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	

#### Blank (2035016-BLK1)

Prepared &amp; Analyzed: 08/25/20 1

Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C40)	ND	50.0							
Surrogate: n-Nonane	52.9		50.0		106	50-200			

#### LCS (2035016-BS1)

Prepared &amp; Analyzed: 08/25/20 1

Diesel Range Organics (C10-C28)	462	25.0	500		92.3	38-132			
Surrogate: n-Nonane	53.4		50.0		107	50-200			

#### Matrix Spike (2035016-MS1)

Source: P008075-01

Prepared &amp; Analyzed: 08/25/20 1

Diesel Range Organics (C10-C28)	489	25.0	500	ND	97.9	38-132			
Surrogate: n-Nonane	48.6		50.0		97.1	50-200			

#### Matrix Spike Dup (2035016-MSD1)

Source: P008075-01

Prepared &amp; Analyzed: 08/25/20 1

Diesel Range Organics (C10-C28)	476	25.0	500	ND	95.2	38-132	2.73	20	
Surrogate: n-Nonane	51.2		50.0		102	50-200			

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Enduring Resources, LLC  
511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

Reported:  
08/27/20 12:27

### Anions by EPA 300.0/9056A - Quality Control

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	REC % %	REC Limits %	RPD % %	RPD Limit %	Notes
<b>Blank (2035017-BLK1)</b>					Prepared: 08/25/20 1 Analyzed: 08/25/20 2				
Chloride	ND	20.0							
<b>LCS (2035017-BS1)</b>					Prepared: 08/25/20 1 Analyzed: 08/25/20 2				
Chloride	247	20.0	250		98.7	90-110			
<b>Matrix Spike (2035017-MS1)</b>					Source: P008083-01 Prepared: 08/25/20 1 Analyzed: 08/26/20 0				
Chloride	268	20.0	250	23.0	98.1	80-120			
<b>Matrix Spike Dup (2035017-MSD1)</b>					Source: P008083-01 Prepared: 08/25/20 1 Analyzed: 08/26/20 0				
Chloride	270	20.0	250	23.0	98.7	80-120	0.532	20	

#### QC Summary Report Comment:

Calculations are based off of the raw (non-rounded) data. However, for reporting purposes all QC data is rounded to three significant figures. Therefore, hand calculated values may differ slightly.

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Enduring Resources, LLC  
511 16th Street, Suite 700  
Denver CO, 80202

Project Name: Marshall A3  
Project Number: 17065-0017  
Project Manager: James McDaniel

**Reported:**  
08/27/20 12:27

### Notes and Definitions

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

RPD Relative Percent Difference

\*\* Methods marked with \*\* are non-accredited methods.

Soil data is reported on an "as received" weight basis, unless reported otherwise.

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**District I**  
1625 N. French Dr., Hobbs, NM 88240  
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**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 10090

CONDITIONS

Operator: ENDURING RESOURCES, LLC 6300 S Syracuse Way, Suite 525 Centennial, CO 80111	OGRID: 372286
	Action Number: 10090
	Action Type: [C-144] PIT Generic Plan (C-144)

CONDITIONS

Created By	Condition	Condition Date
vvenegas	None	11/4/2021