



March 17, 2021

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

**Re: Release Characterization and Deferral Request  
ConocoPhillips  
Tomahawk 19 State Battery Release  
Unit Letter H, Section 19, Township 17 South, Range 34 East  
Lea County, New Mexico  
Incident ID: nRM2028029792**

Sir or Madam:

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips Company (COP) to evaluate a release that occurred at the Tomahawk 19 State Battery, Unit Letter H, Section 19, Township 17 South, Range 34 East, in Lea County, New Mexico (Site). The battery is adjacent to the Tomahawk 19 State #001 well (API #30-025-34583). The approximate release Site coordinates are 32.820098°, -103.595542°. The Site location is shown on Figures 1 and 2.

## BACKGROUND

According to the State of New Mexico C-141 Initial Report, the release was discovered on September 25, 2020, and approximately 28 barrels (bbls) of crude oil were released due to a tank failure. The reported release footprint was largely contained within the earthen berm of the tank battery. Vacuum trucks were dispatched to remove the freestanding fluids, recovering approximately 10 bbls of oil. The API# listed in the C-141 is for the Tomahawk 19 State #001 well. New Mexico Oil Conservation Division (NMOCD) was notified of the release on September 26, 2020. NMOCD received the initial C-141 on October 5, 2020. The incident ID for this release is nRM2028029792. The initial C-141 Form is included in Appendix A.

## SITE CHARACTERIZATION

A site characterization was performed and no watercourses, lakebeds, sinkholes, playa lakes, residences, schools, hospitals, institutions, churches, private domestic water wells, springs, wetlands, incorporated municipal boundaries, subsurface mines, or floodplains are located within the specified distances. The site is in a low karst potential area.

According to the New Mexico Office of the State Engineers (NMOSE) reporting system, there is one water well within 800 meters (approximately ½ mile) of the Site. The depth to groundwater for that well is 140 ft below ground surface (bgs). The site characterization data is shown in Appendix B.

## REGULATORY FRAMEWORK

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

Tetra Tech

901 West Wall St., Suite 100, Midland, TX 79701

Tel 432.682.4559 Fax 432.682.3946 www.tetrattech.com

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ConocoPhillips

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

Constituent	Remediation RRAL
Chloride	20,000 mg/kg
TPH	2,500 mg/kg
BTEX	50 mg/kg

As this reported contamination is in areas immediately under or around production tanks and pipelines, full remediation would cause a major facility deconstruction. The full final remediation, restoration and reclamation for this release is requested to be deferred until the equipment is removed during other operations, or when the facility is retrofitted or abandoned, whichever comes first.

## INITIAL RESPONSE

In accordance with 19.15.29.8.B.(4) NMAC that states “the responsible party may commence remediation immediately after discovery of a release”, COP elected to begin remediation of the impacted area in 2020. The approximate release footprint is indicated in Figure 3. The interior of the earthen berm (majority of the footprint of the release) was excavated to approximately 6 inches bgs to remove the visually impacted soils as shown in Figure 4. The area where the release overtopped the berm was also excavated to six inches bgs. The entirety of the tank battery and surrounding area is underlain by a dense cap rock. The excavated material was transported offsite for proper disposal. Approximately 22 cubic yards of material were transported to the R360 facility in Hobbs, New Mexico. Waste Manifests are found in Appendix E.

## SITE ASSESSMENT

As discussed, as a portion of initial response, visually impacted soils both inside and outside the berm were excavated based on the identified release footprint. In order to determine if initial response remedial activities had met the remediation standards pursuant to 19.15.29.12 NMAC, Tetra Tech personnel collected floor samples from two locations inside the release footprint. A total of 2 floor sample (FS) locations were used during the sampling activities in December 2020.

While onsite, Tetra Tech personnel also delineated the release footprint perimeter. A total of four (4) soil borings (AH-1 through AH-4) were installed to a depth of six inches bgs around the perimeter of the secondary containment and release area to define the horizontal extents of the release in the four cardinal directions. Boring locations are shown on Figure 4.

A total of 3 samples were collected from the 2 floor locations, and a total of 4 soil samples were collected from the 4 boring locations from the perimeter of the release area. All samples were placed into laboratory-provided sample containers, transferred under chain-of-custody, and analyzed for TPH, BTEX, and chloride within appropriate holding times. Collected samples were submitted to Cardinal Laboratories in Hobbs, NM to be analyzed for chlorides via EPA Method 4500.0, TPH via EPA Method 8015M, and BTEX via EPA Method 8021B. A copy of the laboratory analytical report and chain-of-custody documentation are included in Appendix C.

## SUMMARY OF SAMPLING RESULTS

The analytical results associated with the sample locations both within the containment berm (Floor-1) and outside the berm (Floor-2) were above the RRALs for TPH and/or chloride. The analytical results associated with the perimeter boring locations (AH-1, AH-2, AH-3, and AH-4) were below the RRALs for TPH, BTEX and chloride.

The sample locations are shown on Figure 4. The results of the December 2020 sampling event are summarized in Table 1. The release extent was horizontally delineated. Although vertical delineation was not achieved for the release extent, the release footprint was predominantly limited to the interior of the containment berm. The sample location outside the berm with RRAL exceedances (Floor-2) is located on

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ConocoPhillips

a caliche lease pad, with extremely dense cap rock in the subsurface. Photographic documentation of the site remediation activities is included as Appendix D.

### ADDITIONAL VERTICAL DELINEATION

After discussion with COP, and after review of the collected analytical data, COP made a decision to defer any further remediation at the Site. Given that horizontal delineation had been achieved, COP requested Tetra Tech perform vertical delineation of impacted soils within the release extent. This vertical delineation was intended to assist in the overall release characterization in accordance with 19.15.29.12 NMAC.

Using a backhoe, a trench (Trench-1) was excavated within the release footprint, just outside the earthen berm on March 10, 2021. Soils were field screened for salinity using an ExTech EC400 ExStik to determine sampling intervals. Based upon screening data, Tetra Tech personnel collected four samples from the trench (0-1', 1-2', 2-3' and 3-4'). The samples were placed into laboratory-provided sample containers, transferred under chain-of-custody, and analyzed for TPH, BTEX, and chloride within appropriate holding times by Cardinal. The analytical results associated with the samples analyzed were below the TPH, BTEX and chloride Site reclamation RRALs in both the 2-3' and 3-4' sample intervals. Thus, the release footprint was considered vertically delineated. The trench location is shown on Figure 4. The analytical results are summarized in Table 1. A copy of the laboratory analytical report and chain-of-custody documentation is included in Appendix C.

### CONCLUSION

The Tomahawk 19 State Battery is scheduled for abandonment in 2021. ConocoPhillips respectfully requests that NMOCD will consider delaying further remediation activities at the Site until the end of life of the battery. At the time of abandonment, retrofit, or inactivity, remediation will be completed in addition to reclamation. Based on the results of the site assessment and release delineation, COP considers the current release footprint to be fully delineated. The contamination is located in areas immediately under and around production tanks and does not cause an imminent risk to human health, the environment, or groundwater. Final remediation and reclamation shall take place in accordance with 19.15.29.12 and 19.15.29.13 NMAC once the Site is no longer being used for oil and gas operations.

Based on the above, ConocoPhillips requests deferral for this impacted area. The completed C-141 forms are enclosed in Appendix A. If you have any questions concerning the soil assessment or the remediation work at the Site, please call me at (512) 338-2861.

Sincerely,  
**Tetra Tech, Inc.**



Christian M. Llull, P.G.  
Project Manager

cc:  
Ms. Kelsy Waggaman, GPBU – ConocoPhillips  
Mr. Luke Alejandro, GPBU - ConocoPhillips

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March 17, 2021

ConocoPhillips

**List of Attachments**

Figures:

- Figure 1 – Site Location Map
- Figure 2 – Site Location/Topographic Map
- Figure 3 – Approximate Release Extent
- Figure 4 – Remedial Activities and Sampling Locations

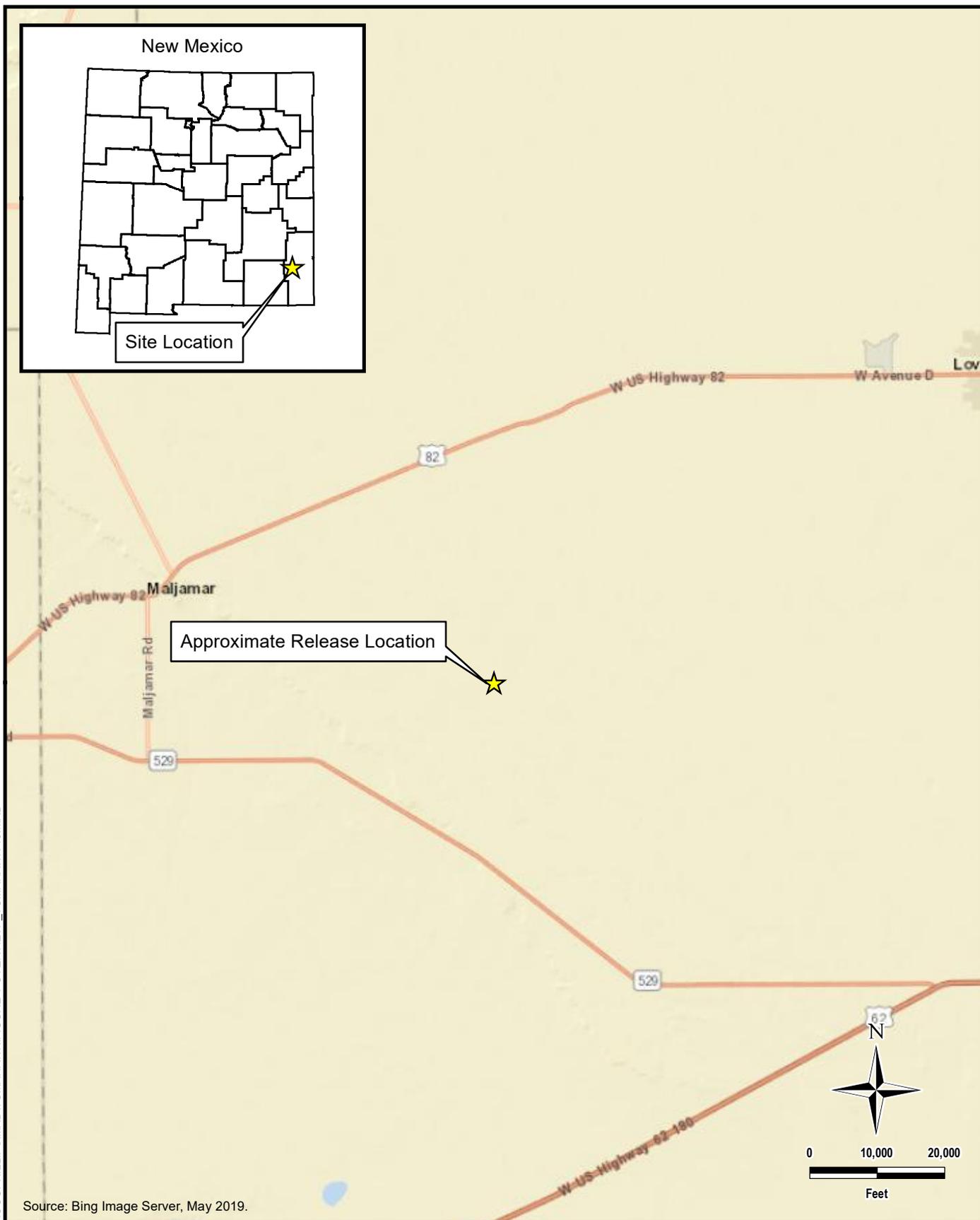
Tables:

- Table 1 – Summary of Analytical Results – Soil Assessment

Appendices:

- Appendix A – C-141 Form
- Appendix B – Site Characterization Data
- Appendix C – Laboratory Analytical Reports
- Appendix D – Photographic Documentation
- Appendix E – Waste Manifests
- Appendix F – NMOCD Extension

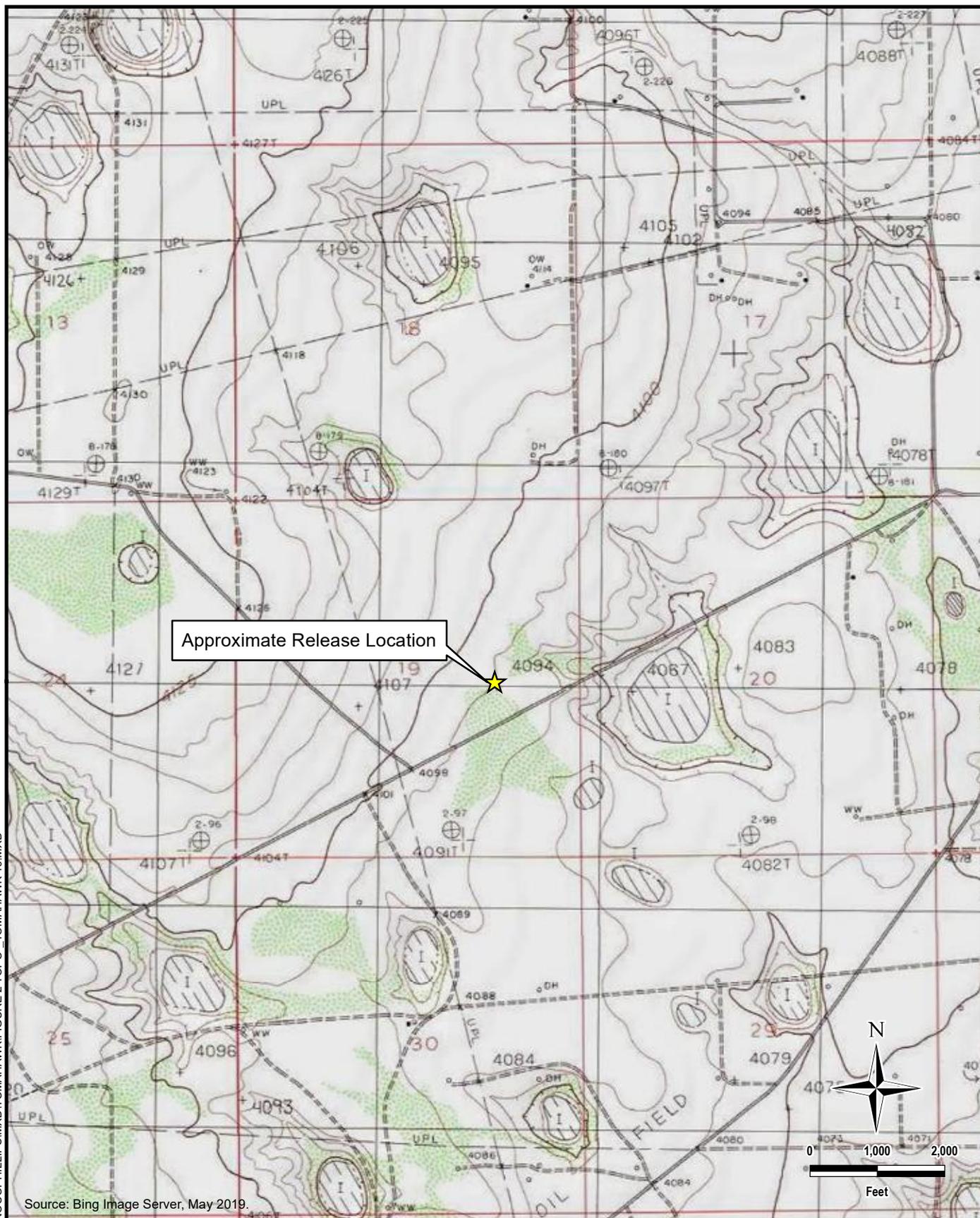
# **FIGURES**



Source: Bing Image Server, May 2019.

DOCUMENT PATH: D:\CONOCOPHILLIPS\MXD\TOMAHAWK\FIGURE 1 OVERVIEW\_TOMAHAWK 19.MXD

 <p>www.tetratech.com 901 West Wall Street, Suite 100 Midland, Texas 79701 Phone: (432) 682-4559 Fax: (432) 682-3946</p>	<p>CONOCOPHILLIPS</p> <p>NRM2028029792 (32.820096°, -103.595545°) LEA COUNTY, NEW MEXICO</p>	<p>PROJECT NO.: 212C-MD-02377</p> <p>DATE: MARCH 16, 2021</p> <p>DESIGNED BY: AAM</p>
	<p><b>TOMAHAWK 19 STATE BATTERY RELEASE OVERVIEW MAP</b></p>	<p>Figure No. <b>1</b></p>



Source: Bing Image Server, May 2019.

DOCUMENT PATH: D:\CONOCOPHILLIPS\MXD\TOMAHAWK\FIGURE 2 TOPO \_TOMAHAWK 19.MXD



**TETRA TECH**

www.tetratech.com

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

CONOCOPHILLIPS

NRM2028029792  
(32.820096°, -103.595545°)  
LEA COUNTY, NEW MEXICO

**TOMAHAWK 19 STATE BATTERY RELEASE  
TOPOGRAPHIC MAP**

PROJECT NO.: 212C-MD-02377

DATE: MARCH 16, 2021

DESIGNED BY: AAM

Figure No.

**2**



DOCUMENT PATH: D:\CONOCOPHILLIPS\MXD\TOMAHAWK\FIGURE 3 RELEASE \_TOMAHAWK 19.MXD

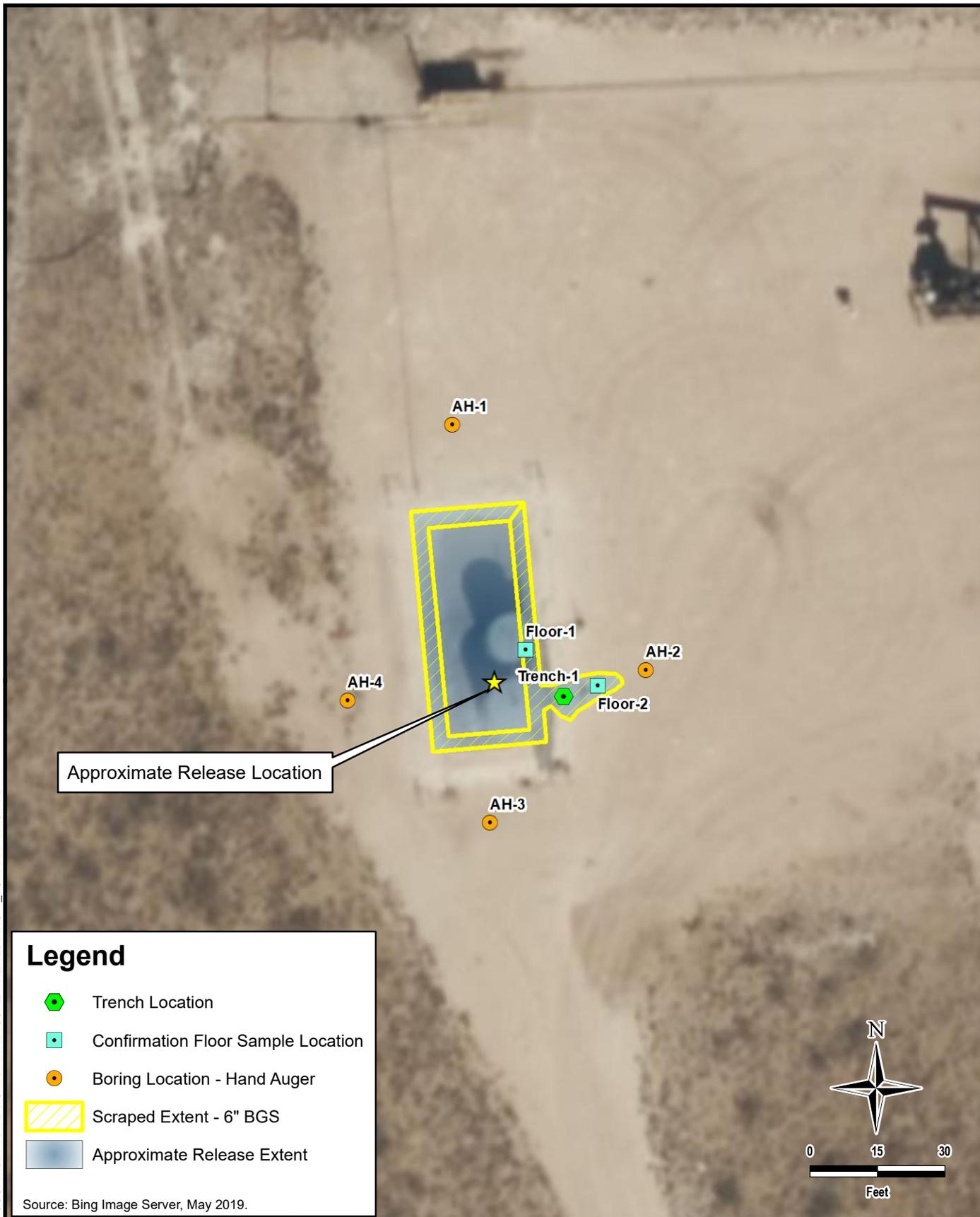
**Legend**

 Approximate Release Extent

Source: Bing Image Server, May 2019.



 www.tetratech.com 901 West Wall Street, Suite 100 Midland, Texas 79701 Phone: (432) 682-4559 Fax: (432) 682-3946	CONOCOPHILLIPS NRM2028029792 (32.820096°, -103.595545°) LEA COUNTY, NEW MEXICO	PROJECT NO.: 212C-MD-02377 DATE: MARCH 16, 2021 DESIGNED BY: AAM
	<b>TOMAHAWK 19 STATE BATTERY RELEASE          APPROXIMATE RELEASE EXTENT</b>	
	Figure No. <b>3</b>	



DOCUMENT PATH: D:\CONOCOPHILLIPS\MXD\TOMAHAWK\FIGURE 4 REMEDIATION \_TOMAHAWK 19.MXD

**Legend**

- Trench Location
- Confirmation Floor Sample Location
- Boring Location - Hand Auger
- Scraped Extent - 6" BGS
- Approximate Release Extent

Source: Bing Image Server, May 2019.



**TETRA TECH**

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 Midland, Texas 79701  
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 Fax: (432) 682-3946

CONOCOPHILLIPS

NRM2028029792  
 (32.820096°, -103.595545°)  
 LEA COUNTY, NEW MEXICO

**TOMAHAWK 19 STATE BATTERY RELEASE  
 REMEDIATION ACTIVITIES AND SAMPLING LOCATIONS**

PROJECT NO.: 212C-MD-02377

DATE: MARCH 16, 2021

DESIGNED BY: AAM

Figure No.

**4**

# **TABLES**

TABLE 1  
 SUMMARY OF ANALYTICAL RESULTS  
 INITIAL SOIL ASSESSMENT  
 CONOCOPHILLIPS  
 TOMAHAWK 19 STATE BATTERY RELEASE  
 nRM2028029792  
 LEA COUNTY, NM

Sample ID	Sample Date	Sampled Depth	Chloride <sup>1</sup>		BTEX <sup>2</sup>								TPH <sup>3</sup>								
					Benzene		Toluene		Ethylbenzene		Total Xylenes		Total BTEX		GRO <sup>4</sup>		DRO		ORO		Total TPH
					C <sub>6</sub> - C <sub>10</sub>		C <sub>10</sub> - C <sub>28</sub>		C <sub>28</sub> - C <sub>36</sub>		mg/kg		mg/kg		mg/kg		mg/kg				
					mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	
Floor-1	12/29/2020	0.5'	<b>1,220</b>		0.926	Q	24.9		53.2		64.0		143		1,110		26,700		5,960		<b>33,770</b>
Floor-1	12/29/2020	1'	<b>4,800</b>		0.363		2.55		3.13		5.99		12.0		134		6,860		1,880		<b>8,874</b>
Floor-2	12/29/2020	0.5'	<b>640</b>		< 0.050		0.394		3.44		8.25		12.1		376		16,200		3,100		<b>19,676</b>
AH-1	12/29/2020	(0'-0.5')	32.0		< 0.050		< 0.050		< 0.050		< 0.150		< 0.300		< 10.0		< 10.0		< 10.0		< 10.0
AH-2	12/29/2020	(0'-0.5')	144		< 0.050		< 0.050		< 0.050		< 0.150		< 0.300		< 10.0		< 10.0		< 10.0		< 10.0
AH-3	12/29/2020	(0'-0.5')	80.0		< 0.050		< 0.050		< 0.050		< 0.150		< 0.300		< 10.0		< 10.0		< 10.0		< 10.0
AH-4	12/29/2020	(0'-0.5')	16.0		< 0.050		< 0.050		< 0.050		< 0.150		< 0.300		< 10.0		< 10.0		< 10.0		< 10.0
Trench-1	3/10/2021	(0'-1')	64.0		< 0.050		0.386		1.54		3.76		5.69		<b>21.1</b>		<b>677</b>		<b>111</b>		<b>809</b>
	3/10/2021	(1'-2')	64.0		< 0.050		0.166		0.581		0.786		1.53		< 10.0		<b>344</b>		<b>56.7</b>		<b>401</b>
	3/10/2021	(2'-3')	96.0		< 0.050		< 0.050		< 0.050		< 0.150		< 0.300		< 10.0		19.0		< 10.0		19.0
	3/1/2021	(3'-4')	48.0		< 0.050		< 0.050		< 0.050		< 0.150		< 0.300		< 10.0		< 10.0		< 10.0		< 10.0

NOTES:

- ft. Feet
- bgs Below ground surface
- ppm Parts per million
- mg/kg Milligrams per kilogram
- NS Not sampled
- TPH Total Petroleum Hydrocarbons
- GRO Gasoline range organics
- DRO Diesel range organics
- ORO Oil range organics
- 1 Method SM4500Cl-B
- 2 EPA Method 8021M
- 3 EPA Method 8015M
- 4 EPA Method 8015D/GRO

***Bold and italicized values indicate exceedance of proposed RRALs based on the region's depth to groundwater and the sampled depth bgs.***

QUALIFIERS:

# **APPENDIX A C-141 Forms**

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

State of New Mexico  
Energy Minerals and Natural  
Resources Department

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

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

Incident ID	NRM2028029792
District RP	
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party	ConocoPhillips Company	OGRID	217817
Contact Name	Kelsy Waggaman	Contact Telephone	505-577-9071
Contact email	Kelsy.Waggaman@ConocoPhillips.com	Incident # (assigned by OCD)	
Contact mailing address	29 Vacuum Complex Lane, Lovington, NM 88260		

### Location of Release Source

Latitude 32.8204002 Longitude -103.5952225  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	TOMAHAWK 19 STATE #001	Site Type	Well
Date Release Discovered	9/25/20	API# (if applicable)	30-025-34583

Unit Letter	Section	Township	Range	County
H	19	17S	34E	Lea

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 checked="" type="checkbox"/> Crude Oil	Volume Released (bbls) <b>28</b>	Volume Recovered (bbls) <b>10</b>
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input 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

Tank Failure

State of New Mexico  
Oil Conservation Division

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Was this a major release as defined by 19.15.29.7(A) NMAC?  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release?  <p style="text-align: center;">The release exceeded 25 bbls of oil.</p>
---	---

If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?

Email notification was given to Bradford Billings and Jim Griswold, OCD by Kelsy Waggaman, ConocoPhillips Environmental Coordinator on 9/26/20.

### Initial Response

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

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> 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: <u>Kelsy Waggaman</u>	Title: <u>Environmental Coordinator</u>
Signature: <u></u>	Date: <u>10/05/20</u>
email: <u>Kelsy.Waggaman@ConocoPhillips.com</u>	Telephone: <u>505-577-9071</u>

**OCD Only**

Received by: Ramona Marcus      Date: 10/06/2020

Incident ID	nRM2028029792
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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?	140 _____ (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

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

- Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- Field data
- Data table of soil contaminant concentration data
- Depth to water determination
- Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- Boring or excavation logs
- Photographs including date and GIS information
- Topographic/Aerial maps
- Laboratory data including chain of custody

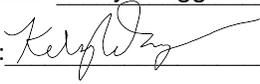
If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods,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

State of New Mexico  
Oil Conservation Division

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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: Kelsy Waggaman Title: Environmental Coordinator  
Signature:  Date: 3/17/21  
email: Kelsy.Waggaman@ConocoPhillips.com Telephone: 505-577-9071

**OCD Only**

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

Incident ID	nRM2028029792
District RP	
Facility ID	
Application ID	

## Remediation Plan

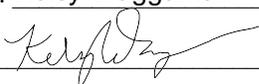
**Remediation Plan Checklist:** Each of the following items must be included in the plan.

- 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: Kelsy Waggaman Title: Environmental Coordinator  
 Signature:  Date: 3/17/21  
 email: Kelsy.Waggaman@ConocoPhillips.com Telephone: 505-577-9071

**OCD Only**

Received by: Chad Hensley Date: 04/09/2021

- Approved       Approved with Attached Conditions of Approval       Denied       Deferral Approved

Signature:  Date: 04/09/2021

## **APPENDIX B**

### **Site Characterization Data**



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

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

(R=POD has been replaced, O=orphaned, C=the file is closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)  
(quarters are smallest to largest)

(NAD83 UTM in meters)

(In feet)

POD Number	POD Sub-Code	basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	Distance	Depth Well	Depth Water	Water Column
<a href="#">L 11049</a>	L	LE		3	1	20	17S	34E		632056	3632445*	628	250	140	110

Average Depth to Water: **140 feet**

Minimum Depth: **140 feet**

Maximum Depth: **140 feet**

**Record Count: 1**

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

**Easting (X):** 631470.194

**Northing (Y):** 3632216

**Radius:** 800

\*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

# Karst Potential Map

ConocoPhillips Tomahawk 19 State #001 Release

## Legend

-  (32.531378°, -103.147099°)
-  CRIT
-  HIGH
-  LOW
-  MEDIUM

 (32.820166°, -103.595549°)

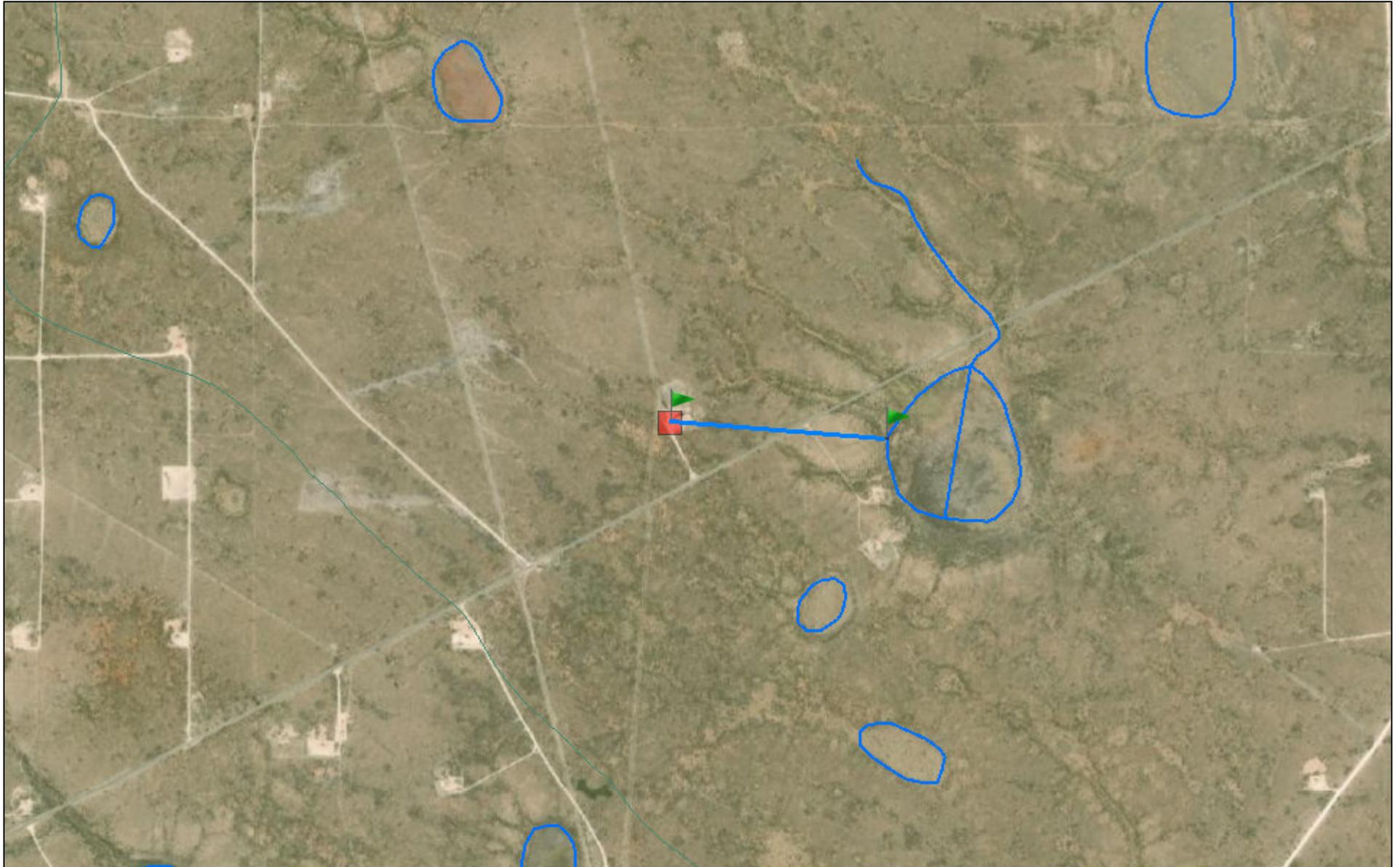
Derby Rd

125

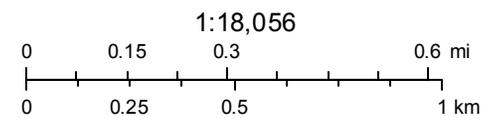
Google Earth



# New Mexico NFHL Data



February 11, 2021



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

# **APPENDIX C**

## **Laboratory Analytical Reports**



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

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January 05, 2021

ANDREW RICHARDS

Conoco Phillips - Hobbs

P. O. BOX 325

Hobbs, NM 88240

RE: TOMAHAWK BATTERY #19 RELEASE

Enclosed are the results of analyses for samples received by the laboratory on 12/29/20 13:45.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-20-13. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene".

Celey D. Keene

Lab Director/Quality Manager



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

**Analytical Results For:**

Conoco Phillips - Hobbs  
 ANDREW RICHARDS  
 P. O. BOX 325  
 Hobbs NM, 88240  
 Fax To: (575) 297-1477

Received:	12/29/2020	Sampling Date:	12/29/2020
Reported:	01/05/2021	Sampling Type:	Soil
Project Name:	TOMAHAWK BATTERY #19 RELEASE	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA CO NM		

**Sample ID: FLOOR-1 (6") (H003350-01)**

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Benzene*</b>	<b>0.926</b>	0.500	12/29/2020	ND	2.03	101	2.00	1.47	
<b>Toluene*</b>	<b>24.9</b>	0.500	12/29/2020	ND	1.96	98.0	2.00	0.781	QM-07
<b>Ethylbenzene*</b>	<b>53.2</b>	0.500	12/29/2020	ND	2.02	101	2.00	1.20	QM-07
<b>Total Xylenes*</b>	<b>64.0</b>	1.50	12/29/2020	ND	5.77	96.1	6.00	0.989	QM-07
<b>Total BTEX</b>	<b>143</b>	3.00	12/29/2020	ND					

Surrogate: 4-Bromofluorobenzene (PID) 123 % 73.3-129

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>1220</b>	16.0	12/30/2020	ND	400	100	400	11.3	

TPH 8015M		mg/kg		Analyzed By: MS						S-06
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>GRO C6-C10*</b>	<b>1110</b>	50.0	12/30/2020	ND	218	109	200	0.555		
<b>DRO &gt;C10-C28*</b>	<b>26700</b>	50.0	12/30/2020	ND	212	106	200	1.60		
<b>EXT DRO &gt;C28-C36</b>	<b>5960</b>	50.0	12/30/2020	ND						

Surrogate: 1-Chlorooctane 341 % 44.3-144

Surrogate: 1-Chlorooctadecane 812 % 42.2-156

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

Conoco Phillips - Hobbs  
 ANDREW RICHARDS  
 P. O. BOX 325  
 Hobbs NM, 88240  
 Fax To: (575) 297-1477

Received:	12/29/2020	Sampling Date:	12/29/2020
Reported:	01/05/2021	Sampling Type:	Soil
Project Name:	TOMAHAWK BATTERY #19 RELEASE	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA CO NM		

**Sample ID: FLOOR-1 (12") (H003350-02)**

BTEX 8021B		mg/kg		Analyzed By: MS				S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Benzene*</b>	<b>0.363</b>	0.050	12/30/2020	ND	2.03	101	2.00	1.47	
<b>Toluene*</b>	<b>2.55</b>	0.050	12/30/2020	ND	1.96	98.0	2.00	0.781	
<b>Ethylbenzene*</b>	<b>3.13</b>	0.050	12/30/2020	ND	2.02	101	2.00	1.20	
<b>Total Xylenes*</b>	<b>5.99</b>	0.150	12/30/2020	ND	5.77	96.1	6.00	0.989	
<b>Total BTEX</b>	<b>12.0</b>	0.300	12/30/2020	ND					

Surrogate: 4-Bromofluorobenzene (PID) 140 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC				S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>4800</b>	16.0	12/30/2020	ND	400	100	400	11.3	

TPH 8015M		mg/kg		Analyzed By: MS				S-06	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>GRO C6-C10*</b>	<b>134</b>	50.0	12/30/2020	ND	218	109	200	0.555	
<b>DRO &gt;C10-C28*</b>	<b>6860</b>	50.0	12/30/2020	ND	212	106	200	1.60	
<b>EXT DRO &gt;C28-C36</b>	<b>1880</b>	50.0	12/30/2020	ND					

Surrogate: 1-Chlorooctane 105 % 44.3-144

Surrogate: 1-Chlorooctadecane 256 % 42.2-156

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

Conoco Phillips - Hobbs  
 ANDREW RICHARDS  
 P. O. BOX 325  
 Hobbs NM, 88240  
 Fax To: (575) 297-1477

Received:	12/29/2020	Sampling Date:	12/29/2020
Reported:	01/05/2021	Sampling Type:	Soil
Project Name:	TOMAHAWK BATTERY #19 RELEASE	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA CO NM		

**Sample ID: FLOOR-2 (6") (H003350-03)**

BTEX 8021B		mg/kg		Analyzed By: MS				S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	12/30/2020	ND	2.03	101	2.00	1.47	
<b>Toluene*</b>	<b>0.394</b>	0.050	12/30/2020	ND	1.96	98.0	2.00	0.781	
<b>Ethylbenzene*</b>	<b>3.44</b>	0.050	12/30/2020	ND	2.02	101	2.00	1.20	
<b>Total Xylenes*</b>	<b>8.25</b>	0.150	12/30/2020	ND	5.77	96.1	6.00	0.989	
<b>Total BTEX</b>	<b>12.1</b>	0.300	12/30/2020	ND					

Surrogate: 4-Bromofluorobenzene (PID) 223 % 73.3-129

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC				S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>640</b>	16.0	12/30/2020	ND	400	100	400	11.3	

TPH 8015M		mg/kg		Analyzed By: MS				S-06	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>GRO C6-C10*</b>	<b>376</b>	50.0	12/30/2020	ND	218	109	200	0.555	
<b>DRO &gt;C10-C28*</b>	<b>16200</b>	50.0	12/30/2020	ND	212	106	200	1.60	
<b>EXT DRO &gt;C28-C36</b>	<b>3100</b>	50.0	12/30/2020	ND					

Surrogate: 1-Chlorooctane 286 % 44.3-144

Surrogate: 1-Chlorooctadecane 519 % 42.2-156

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

Conoco Phillips - Hobbs  
 ANDREW RICHARDS  
 P. O. BOX 325  
 Hobbs NM, 88240  
 Fax To: (575) 297-1477

Received:	12/29/2020	Sampling Date:	12/29/2020
Reported:	01/05/2021	Sampling Type:	Soil
Project Name:	TOMAHAWK BATTERY #19 RELEASE	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA CO NM		

**Sample ID: AH-1 (0-6") (H003350-04)**

BTEX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	12/29/2020	ND	2.03	101	2.00	1.47		
Toluene*	<0.050	0.050	12/29/2020	ND	1.96	98.0	2.00	0.781		
Ethylbenzene*	<0.050	0.050	12/29/2020	ND	2.02	101	2.00	1.20		
Total Xylenes*	<0.150	0.150	12/29/2020	ND	5.77	96.1	6.00	0.989		
Total BTEX	<0.300	0.300	12/29/2020	ND						

Surrogate: 4-Bromofluorobenzene (PID) 101 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	12/30/2020	ND	400	100	400	11.3		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10*	<10.0	10.0	01/04/2021	ND	218	109	200	0.555	QR-03	
DRO >C10-C28*	<10.0	10.0	01/04/2021	ND	212	106	200	1.60	QR-03	
EXT DRO >C28-C36	<10.0	10.0	01/04/2021	ND					QR-03	

Surrogate: 1-Chlorooctane 82.4 % 44.3-144

Surrogate: 1-Chlorooctadecane 76.3 % 42.2-156

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

Conoco Phillips - Hobbs  
 ANDREW RICHARDS  
 P. O. BOX 325  
 Hobbs NM, 88240  
 Fax To: (575) 297-1477

Received:	12/29/2020	Sampling Date:	12/29/2020
Reported:	01/05/2021	Sampling Type:	Soil
Project Name:	TOMAHAWK BATTERY #19 RELEASE	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA CO NM		

**Sample ID: AH-2 (0-6") (H003350-05)**

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	12/29/2020	ND	2.03	101	2.00	1.47	
Toluene*	<0.050	0.050	12/29/2020	ND	1.96	98.0	2.00	0.781	
Ethylbenzene*	<0.050	0.050	12/29/2020	ND	2.02	101	2.00	1.20	
Total Xylenes*	<0.150	0.150	12/29/2020	ND	5.77	96.1	6.00	0.989	
Total BTEX	<0.300	0.300	12/29/2020	ND					

Surrogate: 4-Bromofluorobenzene (PID) 101 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	144	16.0	12/30/2020	ND	400	100	400	11.3	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	12/30/2020	ND	218	109	200	0.555	
DRO >C10-C28*	<10.0	10.0	12/30/2020	ND	212	106	200	1.60	
EXT DRO >C28-C36	<10.0	10.0	12/30/2020	ND					

Surrogate: 1-Chlorooctane 61.3 % 44.3-144

Surrogate: 1-Chlorooctadecane 55.9 % 42.2-156

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

Conoco Phillips - Hobbs  
 ANDREW RICHARDS  
 P. O. BOX 325  
 Hobbs NM, 88240  
 Fax To: (575) 297-1477

Received:	12/29/2020	Sampling Date:	12/29/2020
Reported:	01/05/2021	Sampling Type:	Soil
Project Name:	TOMAHAWK BATTERY #19 RELEASE	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA CO NM		

**Sample ID: AH-3 (0-6") (H003350-06)**

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	12/29/2020	ND	2.03	101	2.00	1.47	
Toluene*	<0.050	0.050	12/29/2020	ND	1.96	98.0	2.00	0.781	
Ethylbenzene*	<0.050	0.050	12/29/2020	ND	2.02	101	2.00	1.20	
Total Xylenes*	<0.150	0.150	12/29/2020	ND	5.77	96.1	6.00	0.989	
Total BTEX	<0.300	0.300	12/29/2020	ND					

Surrogate: 4-Bromofluorobenzene (PID) 100 % 73.3-129

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	12/30/2020	ND	416	104	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	12/30/2020	ND	218	109	200	0.555	
DRO >C10-C28*	<10.0	10.0	12/30/2020	ND	212	106	200	1.60	
EXT DRO >C28-C36	<10.0	10.0	12/30/2020	ND					

Surrogate: 1-Chlorooctane 86.5 % 44.3-144

Surrogate: 1-Chlorooctadecane 80.3 % 42.2-156

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

Conoco Phillips - Hobbs  
 ANDREW RICHARDS  
 P. O. BOX 325  
 Hobbs NM, 88240  
 Fax To: (575) 297-1477

Received:	12/29/2020	Sampling Date:	12/29/2020
Reported:	01/05/2021	Sampling Type:	Soil
Project Name:	TOMAHAWK BATTERY #19 RELEASE	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Jodi Henson
Project Location:	LEA CO NM		

**Sample ID: AH-4 (0-6") (H003350-07)**

BTEX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	12/29/2020	ND	2.03	101	2.00	1.47		
Toluene*	<0.050	0.050	12/29/2020	ND	1.96	98.0	2.00	0.781		
Ethylbenzene*	<0.050	0.050	12/29/2020	ND	2.02	101	2.00	1.20		
Total Xylenes*	<0.150	0.150	12/29/2020	ND	5.77	96.1	6.00	0.989		
Total BTEX	<0.300	0.300	12/29/2020	ND						

Surrogate: 4-Bromofluorobenzene (PID) 101 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	16.0	16.0	12/30/2020	ND	416	104	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10*	<10.0	10.0	12/30/2020	ND	218	109	200	0.555		
DRO >C10-C28*	<10.0	10.0	12/30/2020	ND	212	106	200	1.60		
EXT DRO >C28-C36	<10.0	10.0	12/30/2020	ND						

Surrogate: 1-Chlorooctane 90.5 % 44.3-144

Surrogate: 1-Chlorooctadecane 84.5 % 42.2-156

Cardinal Laboratories

\*=Accredited Analyte

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Notes and Definitions

- S-06 The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.
S-04 The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
QR-03 The RPD value for the sample duplicate or MS/MSD was outside of QC acceptance limits due to matrix interference. QC batch accepted based on LCS and/or LCSD recovery and/or RPD values.
QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
ND Analyte NOT DETECTED at or above the reporting limit
RPD Relative Percent Difference
\*\* Samples not received at proper temperature of 6°C or below.
\*\*\* Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
Samples reported on an as received basis (wet) unless otherwise noted on report

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Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager



101 East Marland, Hobbs, NM 88240  
 (575) 393-2326 FAX (575) 393-2476

**CHAIN-OF-CUSTODY AND ANALYSIS REQUEST**

<b>Company Name:</b> <i>ConocoPhillips</i> <b>Project Manager:</b> <i>Joe Tyler w/ Tetra Tech</i> <b>Address:</b> <b>City:</b> <b>State:</b> <b>Zip:</b> <b>Phone #:</b> (457) 210-6952 <b>Fax #:</b> <b>Project #:</b> <b>Project Owner:</b> <b>Project Name:</b> <i>Conoco Phillips Tomahawk Battery #19 Release</i> <b>Project Location:</b> <i>Tomahawk Battery #19</i> <b>Sampler Name:</b> <i>Joe Tyler</i> <small>FOR LAB USE ONLY</small>		<b>P.O. #:</b> <b>Company:</b> <i>ConocoPhillips</i> <b>Attn:</b> <i>Andrew Richards</i> <b>Address:</b> <i>andrew.r.richards@conocophillips.com</i> <b>City:</b> <b>State:</b> <b>Zip:</b> <b>Phone #:</b> (575) 651-6551 <b>Fax #:</b>	
<b>Lab I.D.</b> <b>Sample I.D.</b>		<b>BILL TO</b>	
PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising whether based in contract or tort shall be limited to the amount paid by the client for the analyses. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.		<b>ANALYSIS REQUEST</b>	
<b>Relinquished By:</b> <i>[Signature]</i> <b>Relinquished By:</b> <i>[Signature]</i> <b>Date:</b> <i>12/29/20</i> <b>Time:</b> <i>13:45</i> <b>Date:</b> <b>Received By:</b> <i>[Signature]</i> <b>Time:</b>		<b>DATE</b> <b>TIME</b> 12-29-20 1300 1310 1320 1330 1340 1350 1400	
<b>Delivered By:</b> (Circle One) UPS - Bus - Other: Observed Temp. °C: <i>4.8</i> Corrected Temp. °C:		<b>MATRIX</b> (G)RAB OR (C)OMP. <input type="checkbox"/> # CONTAINERS <input type="checkbox"/> GROUNDWATER <input type="checkbox"/> WASTEWATER <input type="checkbox"/> SOIL <input checked="" type="checkbox"/> OIL <input type="checkbox"/> SLUDGE <input type="checkbox"/> OTHER: <input type="checkbox"/> ACID/BASE: <input type="checkbox"/> ICE / COOL <input checked="" type="checkbox"/> OTHER: <input type="checkbox"/>	
Turnaround Time: <input checked="" type="checkbox"/> Standard <input type="checkbox"/> Rush Thermometer ID #113 <input type="checkbox"/> Correction Factor: None <input type="checkbox"/>		<b>PRESERV</b> DATE <b>SAMPLING</b> BTEX <input checked="" type="checkbox"/> TPH <input checked="" type="checkbox"/> Chlorides <input checked="" type="checkbox"/>	
Sample Condition: <input checked="" type="checkbox"/> Cool Intact <input type="checkbox"/> Yes <input type="checkbox"/> No Checked By: <i>[Signature]</i> Initials:		Bacteria (only) <input checked="" type="checkbox"/> Cool Intact <input type="checkbox"/> Yes <input type="checkbox"/> No Sample Condition <input type="checkbox"/> Observed Temp. °C <input type="checkbox"/> Corrected Temp. °C <input type="checkbox"/>	
Verbal Result: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Add'l Phone #: All Results are emailed. Please provide Email address: REMARKS: <i>andrew.r.richards@conocophillips.com, joe.tyler@tetratech.com</i>		Cardinal cannot accept verbal changes. Please email changes to celey.keene@cardinallabsnm.com	



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

---

March 15, 2021

ANDREW RICHARDS

Conoco Phillips - Hobbs

P. O. BOX 325

Hobbs, NM 88240

RE: TOMAHAWK 19

Enclosed are the results of analyses for samples received by the laboratory on 03/10/21 13:30.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-20-13. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene".

Celey D. Keene

Lab Director/Quality Manager



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

**Analytical Results For:**

Conoco Phillips - Hobbs  
 ANDREW RICHARDS  
 P. O. BOX 325  
 Hobbs NM, 88240  
 Fax To: (575) 297-1477

Received:	03/10/2021	Sampling Date:	03/10/2021
Reported:	03/15/2021	Sampling Type:	Soil
Project Name:	TOMAHAWK 19	Sampling Condition:	Cool & Intact
Project Number:	212C-MD-02377	Sample Received By:	Tamara Oldaker
Project Location:	TOMAHAWK 19		

**Sample ID: TRENCH - 1 ( 0-1 ) (H210599-01)**

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	03/12/2021	ND	2.10	105	2.00	1.62	
<b>Toluene*</b>	<b>0.386</b>	0.050	03/12/2021	ND	2.05	102	2.00	2.21	
<b>Ethylbenzene*</b>	<b>1.54</b>	0.050	03/12/2021	ND	1.99	99.5	2.00	1.48	
<b>Total Xylenes*</b>	<b>3.76</b>	0.150	03/12/2021	ND	5.85	97.5	6.00	1.41	
<b>Total BTEX</b>	<b>5.69</b>	0.300	03/12/2021	ND					

Surrogate: 4-Bromofluorobenzene (PID) 122 % 73.3-129

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>64.0</b>	16.0	03/12/2021	ND	400	100	400	3.92	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>GRO C6-C10*</b>	<b>21.1</b>	10.0	03/12/2021	ND	206	103	200	1.23	
<b>DRO &gt;C10-C28*</b>	<b>677</b>	10.0	03/12/2021	ND	201	100	200	1.56	
<b>EXT DRO &gt;C28-C36</b>	<b>111</b>	10.0	03/12/2021	ND					

Surrogate: 1-Chlorooctane 86.9 % 44.3-144

Surrogate: 1-Chlorooctadecane 112 % 42.2-156

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

Conoco Phillips - Hobbs  
 ANDREW RICHARDS  
 P. O. BOX 325  
 Hobbs NM, 88240  
 Fax To: (575) 297-1477

Received: 03/10/2021  
 Reported: 03/15/2021  
 Project Name: TOMAHAWK 19  
 Project Number: 212C-MD-02377  
 Project Location: TOMAHAWK 19

Sampling Date: 03/10/2021  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: TRENCH - 1 ( 1-2 ) (H210599-02)**

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	03/12/2021	ND	2.10	105	2.00	1.62	
<b>Toluene*</b>	<b>0.166</b>	0.050	03/12/2021	ND	2.05	102	2.00	2.21	
<b>Ethylbenzene*</b>	<b>0.581</b>	0.050	03/12/2021	ND	1.99	99.5	2.00	1.48	
<b>Total Xylenes*</b>	<b>0.786</b>	0.150	03/12/2021	ND	5.85	97.5	6.00	1.41	
<b>Total BTEX</b>	<b>1.53</b>	0.300	03/12/2021	ND					

Surrogate: 4-Bromofluorobenzene (PID) 105 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>64.0</b>	16.0	03/12/2021	ND	400	100	400	3.92	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	03/12/2021	ND	206	103	200	1.23	
<b>DRO &gt;C10-C28*</b>	<b>344</b>	10.0	03/12/2021	ND	201	100	200	1.56	
<b>EXT DRO &gt;C28-C36</b>	<b>56.7</b>	10.0	03/12/2021	ND					

Surrogate: 1-Chlorooctane 81.3 % 44.3-144

Surrogate: 1-Chlorooctadecane 97.8 % 42.2-156

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\* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

Conoco Phillips - Hobbs  
 ANDREW RICHARDS  
 P. O. BOX 325  
 Hobbs NM, 88240  
 Fax To: (575) 297-1477

Received: 03/10/2021  
 Reported: 03/15/2021  
 Project Name: TOMAHAWK 19  
 Project Number: 212C-MD-02377  
 Project Location: TOMAHAWK 19

Sampling Date: 03/10/2021  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: TRENCH - 1 ( 2-3 ) (H210599-03)**

BTEX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	03/12/2021	ND	2.10	105	2.00	1.62	
Toluene*	<0.050	0.050	03/12/2021	ND	2.05	102	2.00	2.21	
Ethylbenzene*	<0.050	0.050	03/12/2021	ND	1.99	99.5	2.00	1.48	
Total Xylenes*	<0.150	0.150	03/12/2021	ND	5.85	97.5	6.00	1.41	
Total BTEX	<0.300	0.300	03/12/2021	ND					

Surrogate: 4-Bromofluorobenzene (PID) 100 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>96.0</b>	16.0	03/12/2021	ND	400	100	400	3.92	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	03/12/2021	ND	206	103	200	1.23	
<b>DRO &gt;C10-C28*</b>	<b>19.0</b>	10.0	03/12/2021	ND	201	100	200	1.56	
EXT DRO >C28-C36	<10.0	10.0	03/12/2021	ND					

Surrogate: 1-Chlorooctane 80.8 % 44.3-144

Surrogate: 1-Chlorooctadecane 83.9 % 42.2-156

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**Analytical Results For:**

Conoco Phillips - Hobbs  
 ANDREW RICHARDS  
 P. O. BOX 325  
 Hobbs NM, 88240  
 Fax To: (575) 297-1477

Received: 03/10/2021  
 Reported: 03/15/2021  
 Project Name: TOMAHAWK 19  
 Project Number: 212C-MD-02377  
 Project Location: TOMAHAWK 19

Sampling Date: 03/10/2021  
 Sampling Type: Soil  
 Sampling Condition: Cool & Intact  
 Sample Received By: Tamara Oldaker

**Sample ID: TRENCH - 1 ( 3-4 ) (H210599-04)**

BTEX 8021B		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	03/12/2021	ND	2.10	105	2.00	1.62		
Toluene*	<0.050	0.050	03/12/2021	ND	2.05	102	2.00	2.21		
Ethylbenzene*	<0.050	0.050	03/12/2021	ND	1.99	99.5	2.00	1.48		
Total Xylenes*	<0.150	0.150	03/12/2021	ND	5.85	97.5	6.00	1.41		
Total BTEX	<0.300	0.300	03/12/2021	ND						

Surrogate: 4-Bromofluorobenzene (PID) 99.1 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>Chloride</b>	<b>48.0</b>	16.0	03/12/2021	ND	400	100	400	3.92		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10*	<10.0	10.0	03/12/2021	ND	206	103	200	1.23		
DRO >C10-C28*	<10.0	10.0	03/12/2021	ND	201	100	200	1.56		
EXT DRO >C28-C36	<10.0	10.0	03/12/2021	ND						

Surrogate: 1-Chlorooctane 82.9 % 44.3-144

Surrogate: 1-Chlorooctadecane 86.3 % 42.2-156

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Notes and Definitions

- QR-03      The RPD value for the sample duplicate or MS/MSD was outside of QC acceptance limits due to matrix interference. QC batch accepted based on LCS and/or LCS/D recovery and/or RPD values.
- ND            Analyte NOT DETECTED at or above the reporting limit
- RPD          Relative Percent Difference
- \*\*            Samples not received at proper temperature of 6°C or below.
- \*\*\*          Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
- Samples reported on an as received basis (wet) unless otherwise noted on report

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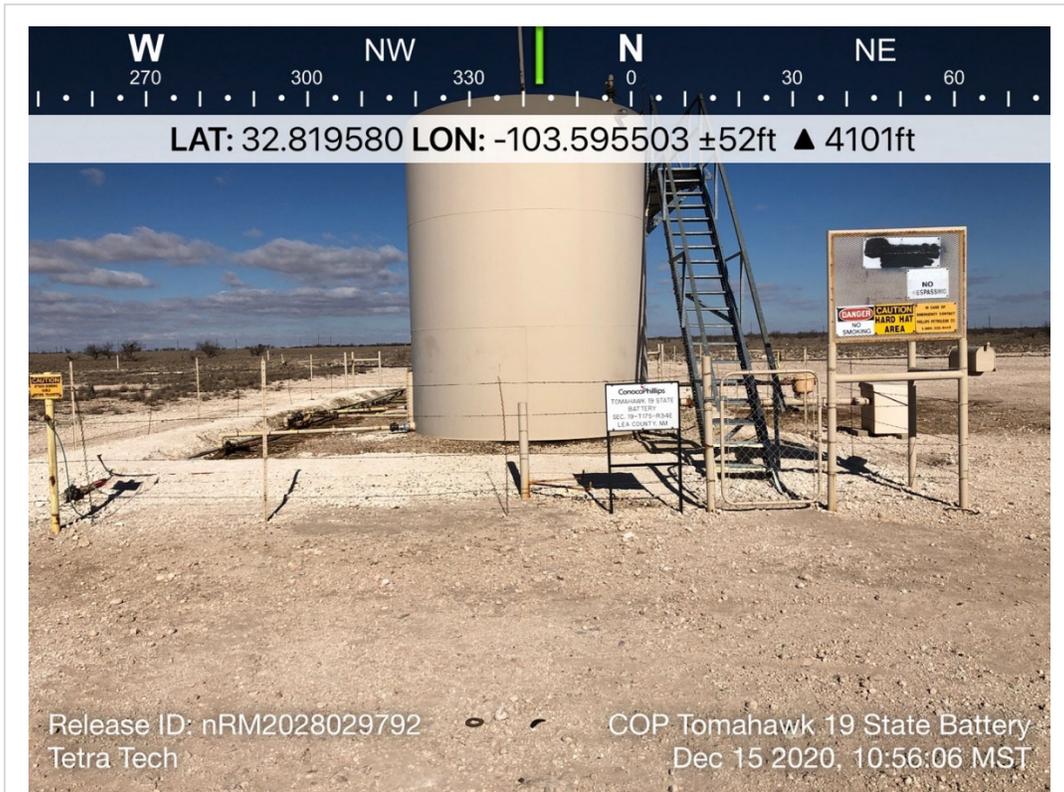
*Celey D. Keene*

Celey D. Keene, Lab Director/Quality Manager



# **APPENDIX D**

## **Photographic Documentation**



TETRA TECH, INC. PROJECT NO. 212C-MD-02377	DESCRIPTION	View of Tomahawk 19 Battery, looking north.	1
	SITE NAME	ConocoPhillips Tomahawk 19 Battery Release	12-15-2020



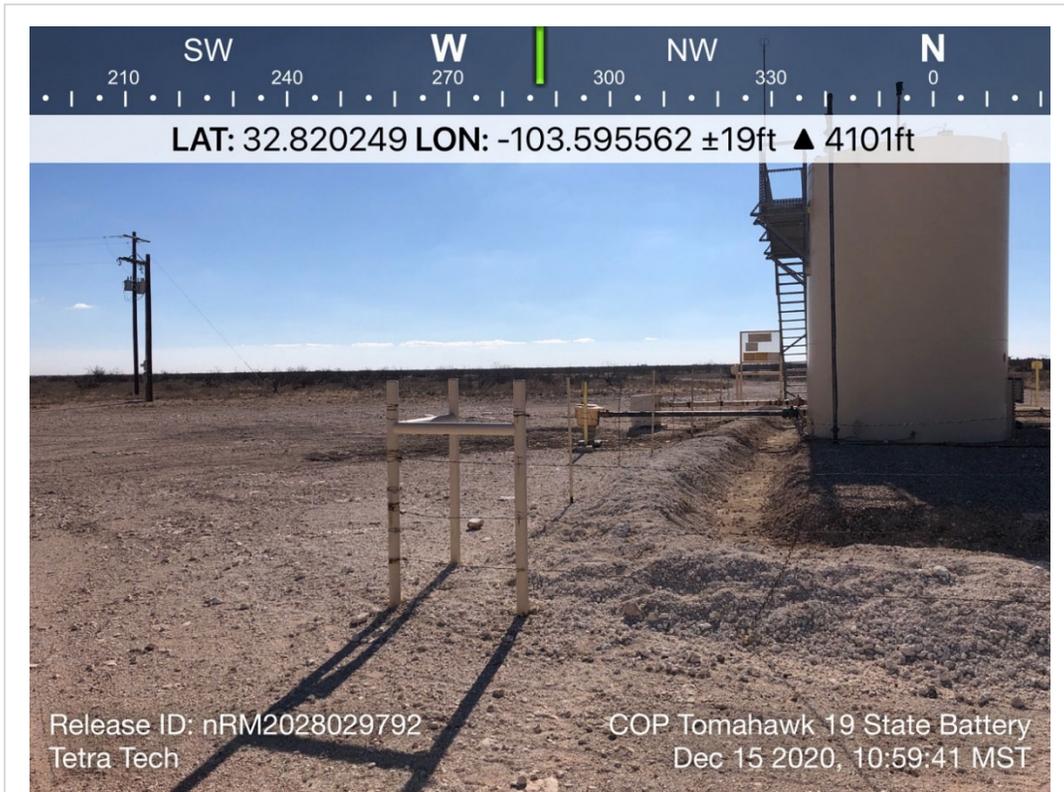
TETRA TECH, INC. PROJECT NO. 212C-MD-02377	DESCRIPTION	View of Tomahawk 19 Battery and the breached area of berm, looking north.	2
	SITE NAME	ConocoPhillips Tomahawk 19 Battery Release	12-15-2020



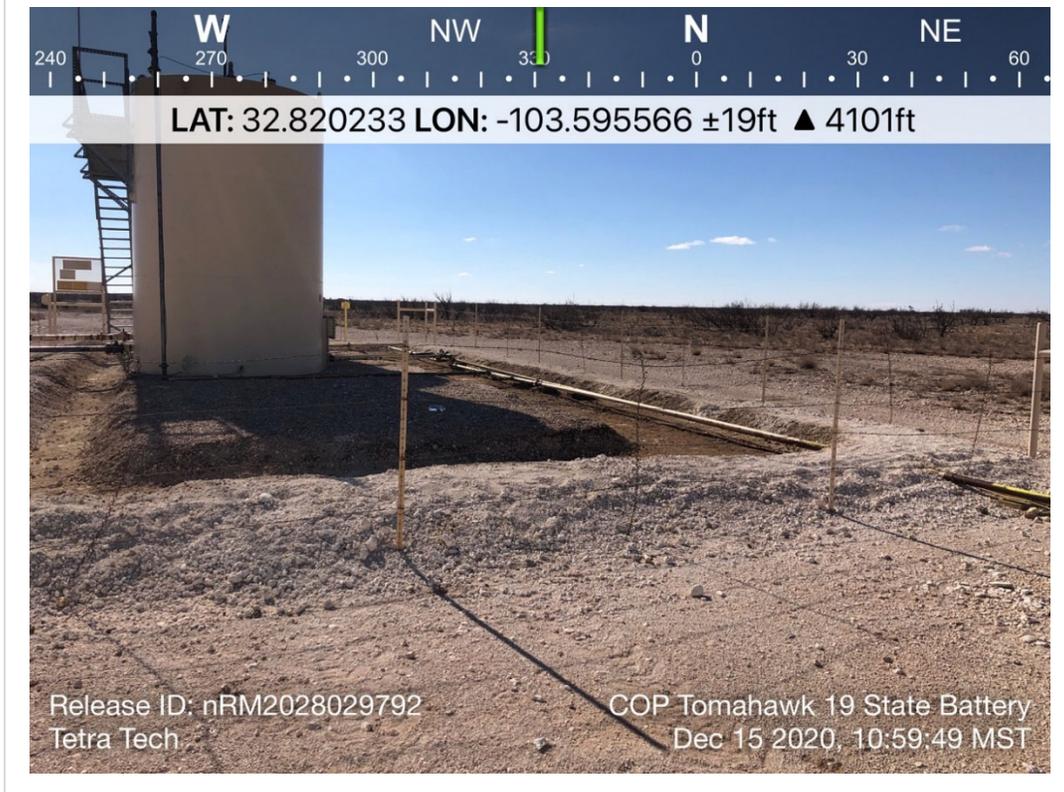
TETRA TECH, INC. PROJECT NO. 212C-MD-02377	DESCRIPTION	View of Tomahawk 19 Battery and the breached area of berm, looking northeast.	3
	SITE NAME	ConocoPhillips Tomahawk 19 Battery Release	12-15-2020



TETRA TECH, INC. PROJECT NO. 212C-MD-02377	DESCRIPTION	View of Tomahawk 19 Battery and the breached area of berm, looking north.	4
	SITE NAME	ConocoPhillips Tomahawk 19 Battery Release	12-15-2020



TETRA TECH, INC. PROJECT NO. 212C-MD-02377	DESCRIPTION	View of Tomahawk 19 Battery and the breached area of berm, looking west.	5
	SITE NAME	ConocoPhillips Tomahawk 19 Battery Release	12-15-2020



TETRA TECH, INC. PROJECT NO. 212C-MD-02377	DESCRIPTION	View of Tomahawk 19 Battery, looking northwest.	6
	SITE NAME	ConocoPhillips Tomahawk 19 Battery Release	12-15-2020

## **APPENDIX E Waste Manifests**

TRANSPORTER'S MANIFEST

MANIFEST # \_\_\_\_\_

SHIPPING FACILITY NAME & ADDRESS:

Company: *Conoco Phillips*  
Address: *Buckeye office*  
Project Lead: *Andrew Richards*

LOCATION OF MATERIAL:

Location: *Tamahawk Battery*  
Company: *Conoco Phillips*

S 19 T 175 R 34E

Lea County, New Mexico

TRANSPORTER NAME & ADDRESS:

McNabb Partners  
4008 N. Grimes #270  
Hobbs, NM 88240

DESCRIPTION OF WASTE:

*Impacted Soil Cont.* Quantity: *12 yds*

FACILITY CONTACT:

Date: *11/30/20* Contact Signature: *[Signature]*  
(Agent for ConocoPhillips)

NAME OF TRANSPORTER: (Driver)

Date: *11/30/20* Driver Signature: *[Signature]*

DISPOSAL SITE:

Name of Disposal: *M-32*  
Address: *R-360*  
Date: *11/30/20* Representative Signature: *[Signature]*



(PLEASE PRINT)

Name \_\_\_\_\_

Phone No. \_\_\_\_\_

**GENERATOR**

NO. **486379**

Operator No. \_\_\_\_\_  
 Operators Name **Conoco Phillips**  
 Address \_\_\_\_\_  
 City, State, Zip \_\_\_\_\_  
 Phone No. \_\_\_\_\_

Permit/RRC No. \_\_\_\_\_  
 Lease/Well Name & No. **Tomahawk Battery**  
 County **Lea**  
 API No. \_\_\_\_\_  
 Rig Name & No. \_\_\_\_\_  
 AFE/PO No. **NON**

EXEMPT E&P Waste/Service Identification and Amount (place volume next to waste type in barrels or cubic yards)		
Oil Based Muds	<input type="checkbox"/>	<b>NON-INJECTABLE WATERS</b> Washout Water (Non-Injectable) _____ Completion Fluid/Flow back (Non-Injectable) _____ Produced Water (Non-Injectable) _____ Gathering Line Water/Waste (Non-Injectable) _____
Oil Based Cuttings	<input type="checkbox"/>	
Water Based Muds	<input type="checkbox"/>	
Water Based Cuttings	<input type="checkbox"/>	
Produced Formation Solids	<input type="checkbox"/>	
Tank Bottoms	<input type="checkbox"/>	<b>INTERNAL USE ONLY</b> Truck Washout (exempt waste) _____
E&P Contaminated Soil	<input checked="" type="checkbox"/>	
Gas Plant Waste	<input type="checkbox"/>	<b>INJECTABLE WATERS</b> Washout Water (Injectable) _____ Completion Fluid/Flow back (Injectable) _____ Produced Water (Injectable) _____ Gathering Line Water/Waste (Injectable) _____
OTHER EXEMPT WASTES (type and generation process of the waste) _____		

WASTE GENERATION PROCESS:  DRILLING  COMPLETION  PRODUCTION  GATHERING LINES

NON-EXEMPT E&P Waste/Service Identification and Amount  
 All non-exempt E&P waste must be analysed and be below the threshold limits for toxicity (TCLP), Ignitability, Corrosivity and Reactivity.  
 Non-Exempt Other \_\_\_\_\_ \*please select from Non-Exempt Waste List on back

QUANTITY B - BARRELS L - LIQUID **17** YARDS E - EACH

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

- RCRA EXEMPT: Oil field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste (R360 Accepts certifications on a per load basis only)
- RCRA NON-EXEMPT: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24, or listed hazardous waste as defined by 40 CFR, part 261, subpart D, as amended. The following documentation demonstrating the waste as non-hazardous is attached. (Check the appropriate items as provided)
  - MSDS Information
  - RCRA Hazardous Waste Analysis
  - Other (Provide Description Below)

EMERGENCY NON-OILFIELD: Emergency non-hazardous, non-oilfield waste that has been ordered by the Department of Public Safety (the order, documentation of non-hazardous waste determination and a description of the waste must accompany this form)

**Andrew Richards**  
 (PRINT) AUTHORIZED AGENTS NAME

DATE \_\_\_\_\_ SIGNATURE \_\_\_\_\_

**TRANSPORTER**

Transporter's Name **McNabb Partners**  
 Address \_\_\_\_\_  
 Phone No. \_\_\_\_\_

Driver's Name **Gumer**  
 Print Name \_\_\_\_\_  
 Phone No. \_\_\_\_\_  
 Truck No. **M-37**

I hereby certify that the above named material(s) was/were picked up at the Generator's site listed above and delivered without incident to the disposal facility listed below.

SHIPMENT DATE \_\_\_\_\_ DRIVER'S SIGNATURE \_\_\_\_\_ DELIVERY DATE **11/30/20** DRIVER'S SIGNATURE **Gumer Rdy**

**TRUCK TIME STAMP** IN: \_\_\_\_\_ OUT: \_\_\_\_\_ **DISPOSAL FACILITY** **RECEIVING AREA** Name/No. **50150**

Site Name/ Permit No. **Halfway Facility / NM1-006** Phone No. **575-393-1079**  
 Address **6601 Hobbs Hwy US 62/180 Mile Marker 66 Carlsbad, NM 88220**  
 NORM READINGS TAKEN? (Circle One) YES  NO  If YES, was reading > 50 micro roentgens? (circle one) YES  NO   
 PASS THE PAINT FILTER TEST? (Circle One) YES  NO

**TANK BOTTOMS**

	Feet	Inches	BS&W/BBLs Received	BS&W (%)
1st Gauge			Free Water	
2nd Gauge			Total Received	
Received				

I hereby certify that the above load material has been (circle one): **ACCEPTED** **11/30** **ARM** If denied, why? \_\_\_\_\_  
 NAME (PRINT) \_\_\_\_\_ DATE \_\_\_\_\_ TITLE \_\_\_\_\_ SIGNATURE \_\_\_\_\_

TRANSPORTER'S MANIFEST

MANIFEST # \_\_\_\_\_

SHIPPING FACILITY NAME & ADDRESS:

Company: *Conoco Phillips*  
Address: *Buckeye office*  
Project Lead: *Andrew Richards*

LOCATION OF MATERIAL:

Location: *Tanahawk Battery*  
Company: *Conoco Phillips*

S 19 T 17S R 34E

Lea County, New Mexico

TRANSPORTER NAME & ADDRESS:

McNabb Partners  
4008 N. Grimes #270  
Hobbs, NM 88240

DESCRIPTION OF WASTE:

*Impacted Soil Cont.* Quantity: *10 yds*

FACILITY CONTACT:

Date: *12-1-20*

Contact Signature:  
(Agent for ConocoPhillips)

NAME OF TRANSPORTER: (Driver)

*m02*

Date: *12-1-20*

Driver Signature:

DISPOSAL SITE:

Name of Disposal:

Address: *R-366*  
Date: *12-1-20*

Representative  
Signature:



Customer: CONOCOPHILLIPS  
 Customer #: CRI2190  
 Ordered by: ANDREW RICHARDS  
 AFE #:  
 PO #:  
 Manifest #: NA  
 Manif. Date: 12/1/2020  
 Hauler: MCNABB PARTNERS  
 Driver: MELINDA  
 Truck #: M02  
 Card #  
 Job Ref #

Ticket #: 700-1178983  
 Bid #: O6UJ9A0009Z1  
 Date: 12/1/2020  
 Generator: CONOCOPHILLIPS  
 Generator #:  
 Well Ser. #: 999908  
 Well Name: TOMAHAWK BATTERY  
 Well #:  
 Field:  
 Field #:  
 Rig: NON-DRILLING  
 County: LEA (NM)

Permian Basin

Facility: CRI

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

Cell	pH	Cl	Cond.	%Solids	TDS	PCI/GM	MR/HR	H2S	% Oil	Weight
50/51	0.00	0.00	0.00	0						

**Generator Certification Statement of Waste Status**

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

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

**Driver/ Agent Signature** **R360 Representative Signature**

*Melinda Montes* \_\_\_\_\_

**Customer Approval**

**THIS IS NOT AN INVOICE!**

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

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

# **APPENDIX F NMOCD Extension**

**Waggaman, Kelsy**

**From:** Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>  
**Sent:** Thursday, January 7, 2021 11:11 AM  
**To:** Waggaman, Kelsy  
**Subject:** [EXTERNAL]Remediation Extension Applications

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

01/07/2021

Conoco Phillips  
 Kelsy Waggaman – Conoco Phillips

Dear Kelsy,

For the locations/incidents indicated below and their associated time extension requests, the following:

The extensions for all three of the sites below are hereby APPROVED to the requested extension deadlines indicated in listing below. The Oil Conservation Division (OCD) appreciates your efforts. Thank you for the reminder, and please keep a copy of this communication for all three sites as no PAPER copy will follow.

Location	Incident Number	Date of Release	90-day Remediation Deadline	Requested Extension/Deadline	Nature of Release	Category and Volume of Release
Warren 19	NRM2032853982	10/20/20	1/18/20	4/18/21	Produced Water	Minor - 19 bbl
Tomahawk 19	NRM2028029792	9/25/25	12/24/20	3/24/21	Crude Oil	Major - 28 bbl total/ 10 bbl recovered
Satellite 3	NRM2027962353	9/19/20	12/18/20	3/18/21	Produced Water	Minor - 9 bbl

Sincerely,

**Bradford Billings** • Enviro. Spec. A  
 Environmental Bureau  
 EMNRD - Oil Conservation Division

5200 Oakland Ave. NE Suite 100 | Albuquerque, NM 87113  
505.670.6549. |[bradford.billings@state.nm.us](mailto:bradford.billings@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations

**District I**  
 1625 N. French Dr., Hobbs, NM 88240  
 Phone:(575) 393-6161 Fax:(575) 393-0720

**District II**  
 811 S. First St., Artesia, NM 88210  
 Phone:(575) 748-1283 Fax:(575) 748-9720

**District III**  
 1000 Rio Brazos Rd., Aztec, NM 87410  
 Phone:(505) 334-6178 Fax:(505) 334-6170

**District IV**  
 1220 S. St Francis Dr., Santa Fe, NM 87505  
 Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS

Action 21129

**CONDITIONS OF APPROVAL**

Operator: CONOCOPHILLIPS COMPANY Office SP2-12-W156	P.O.Box 2197 Houston, TX77252	OGRID: 217817	Action Number: 21129	Action Type: C-141
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OCD Reviewer	Condition
chensley	Conoco's deferral requests to complete final remediation during any future major construction/alteration or final plugging and abandonment, whichever occurs first is approved.