

November 13, 2023

Brittany Hall
Projects Environmental Specialist
New Mexico Energy, Minerals, and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Revised Characterization and Closure Request
ConocoPhillips
James E Well #15 Stuffing Box Release
Unit Letter L, Section 12, Township 22 South, Range 30 East
Eddy County, New Mexico
Incident ID# NKMW1035736062

Sir or Madam:

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips Company (ConocoPhillips) to assess a historical release that occurred from the stuffing box at the James E Well #015 well (API No. 30-015-27078). The release footprint is located in Public Land Survey System (PLSS) Unit Letter L, Section 12, Township 22 South, Range 30 East, in Eddy County, New Mexico (Site). The approximate release point occurred at coordinates 32.404842°, -103.839704° as shown on Figures 1 and 2.

BACKGROUND

According to the State of New Mexico Oil Conservation Division (NMOCD) C-141 Initial Report, the release occurred on May 25, 2010, when the multi-skill operator (MSO) found the stuffing box had leaked. Approximately four (4) barrels (bbls) of oil and nine (9) bbls of produced water were released, of which nine (9) bbls of produced water and three (3) bbls of oil were recovered. The area affected was reported as 20 feet by 117 feet of caliche pad, as shown on Figure 3. The NMOCD approved the initial C-141 on March 3, 2011, and subsequently assigned the release the Incident ID NKMW1035736062. The initial C-141 form is included in Appendix A.

This incident is included in an Agreed Compliance Order-Releases (ACO-R) between ConocoPhillips and the NMOCD signed on May 7 and 9, 2019, respectively.

LAND OWNERSHIP

The Site is located on land owned by the Bureau of Land Management (BLM). This is a previously disturbed area as the release was wholly located within the footprint of a constructed a caliche pad.

SITE CHARACTERIZATION

A site characterization was performed and no sinkholes, playa lakes, residences, schools, hospitals, institutions, churches, springs, private domestic water wells, stream bodies, wetlands, incorporated municipal boundaries, subsurface mines, or floodplains are located within the distances specified in 19.15.29 New Mexico Administrative Code (NMAC). The Site is in an area of medium karst potential.

Tetra Tech

Release Characterization and Closure Request November 13, 2023

ConocoPhillips

According to the New Mexico Office of the State Engineers (NMOSE) reporting system, there are no water wells within an 800-meter radius (approximately 1/2 mile) of the site. According to the NMOSE, there is one well within 2.29 miles (3694 meters) with a total well depth of 101 feet. No depth to water data was provided for this well.

As the available water level information is from a well farther than ½ mile away from the site, COP elected to drill a boring to verify depth to groundwater. On February 28, 2023, ConocoPhillips contracted a licensed well drilling subcontractor to drill a groundwater determination borehole (DTW) to 105 feet bgs along the southern edge of the James E #001 well pad for a separate release associated with Incident ID nRM2007952227. The borehole was temporarily set and screened using 2-inch PVC well materials. No water was present in the well during or after drilling. The well screen and casing were removed, and the borehole was plugged with 3/8-inch bentonite chips. The James E #001 DTW boring is located approximately 0.60 miles northwest of the James E Well #15 Stuffing Box Release extent. The borehole coordinates are 32.408042°, -103.849478° and the boring location is indicated in Figure 4. The site characterization data, boring log, and temporary well diagram are included in Appendix B.

REGULATORY FRAMEWORK

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

Based on the site characterization (on-pad release footprint) and in accordance with Table I of 19.15.29.12 NMAC, the RRALs for the Site are as follows:

Constituent	Site RRALs
Chloride	20,000 mg/kg
TPH (GRO+DRO+ORO)	2,500 mg/kg
TPH (GRO+DRO)	1,000 mg/kg
BTEX	50 mg/kg
Benzene	10 mg/kg

2020 VISUAL SITE INSPECTION AND CLOSURE REQUEST

Tetra Tech, on behalf of ConocoPhillips, conducted a records review and a visual inspection of the release. On June 16, 2020, Tetra Tech personnel were onsite to evaluate the release area, and observed no surficial staining on the pad areas near the wellhead, nor in the adjacent pasture areas near the site. The formerly impacted area was identified from the description of the C-141. A review of available aerial imagery revealed no evidence of impact in the reported release location. Per the C-141, the formerly impacted release footprint was restricted to active oil and gas production areas in the caliche well pad.

Based on these findings, Tetra Tech completed a Closure Letter Report dated October 15, 2020, and submitted the report to NMOCD as part of the ACO submittals via the online file sharing platform CentreStack. A copy of the Closure Letter Report is available in the NMOCD online incident files.

The Closure Letter Report was rejected by NMOCD on April 18, 2023, with the following comments:

- Closure for this incident is not approved.
- The OCD requires that this release be Remediated according to 19.15.29.12 NMAC and 19.15.29 13 NMAC as they apply to this release and resubmit a closure report by 07/17/2023.

Release Characterization and Closure Request November 13, 2023

ConocoPhillips

An extension request for this incident was submitted to the NMOCD on September 22, 2023. The extension was approved on September 25, 2023, for a due date of December 1, 2023. Regulatory correspondence is included in Appendix C.

2023 SITE ASSESSMENT AND SAMPLING RESULTS

ConocoPhillips, Tetra Tech, and NMOCD had a Microsoft Teams meeting on September 20, 2023, to discuss the remaining open ACO incidents. During this call NMOCD indicated that open incidents without approved work plans need to be assessed in accordance with 19.15.29.11 NMAC.

Before commencing assessment activities, Tetra Tech conducted a records review. Based on a cursory review of available historical imagery, an approximate release footprint was discerned. The observed release extent consisted of approximately 1,724 sf.

Tetra Tech personnel were onsite on October 23, 2023, to conduct assessment activities. Two (2) hand auger borings (AH-1 and AH-2) were installed to 4 feet bgs to achieve vertical delineation of the release footprint. Four (4) hand auger borings (AH-3 through AH-6) were installed to 1 foot bgs to achieve horizontal delineation. Boring locations from the October 2023 sampling event are presented in Figure 3. Photographic documentation of the release area and assessment activities is presented in Appendix D.

A total of ten (10) soil samples were collected from the six borings and sent to Cardinal Laboratories in Hobbs, New Mexico to be analyzed for chloride via EPA Method 300.0, TPH via EPA Method 8015M, and BTEX via EPA Method 8261B. A copy of the laboratory analytical report and chain-of-custody documentation are included in Appendix E. The results were directly compared to the established Site RRALs to demonstrate compliance. Analytical results from the 2023 assessment activities are summarized in Table 1. All analytical results were below the applicable Site RRALs for all constituents.

CONCLUSION

A total of ten samples were collected from the approximate release area. All analytical results associated with 2023 assessment results were below the Site RRALs; therefore, no further remediation of the on-pad release footprint is required.

Based on the above, ConocoPhillips respectfully requests closure for this release. Final reclamation of the well pad shall take place in accordance with 19.15.29.13 NMAC once the site is no longer being used for oil and gas operations. The final C-141 forms are enclosed in Appendix A. If you have any questions concerning the soil assessment activities for the Site, please call me at (512) 739-7874.

Sincerely,

Tetra Tech, Inc.

Lisbeth Chavira Staff Geoscientist

CC:

Mr. Moises Cantu Garcia, PBU - ConocoPhillips

Christian M. Llull, P.G. Program Manager

TETRA TECH. INC.

Release Characterization and Closure Request November 13, 2023

ConocoPhillips

LIST OF ATTACHMENTS

Figures:

Figure 1 – Overview Map

Figure 2 – Topographic Map

Figure 3 – Approximate Release Extent and Site Assessment

Figure 4 – Approximate Release Extent and Site Assessment with DTW Location

Tables:

Table 1 – Summary of Analytical Results – 2023 Soil Assessment

Appendices:

Appendix A – C-141 Forms

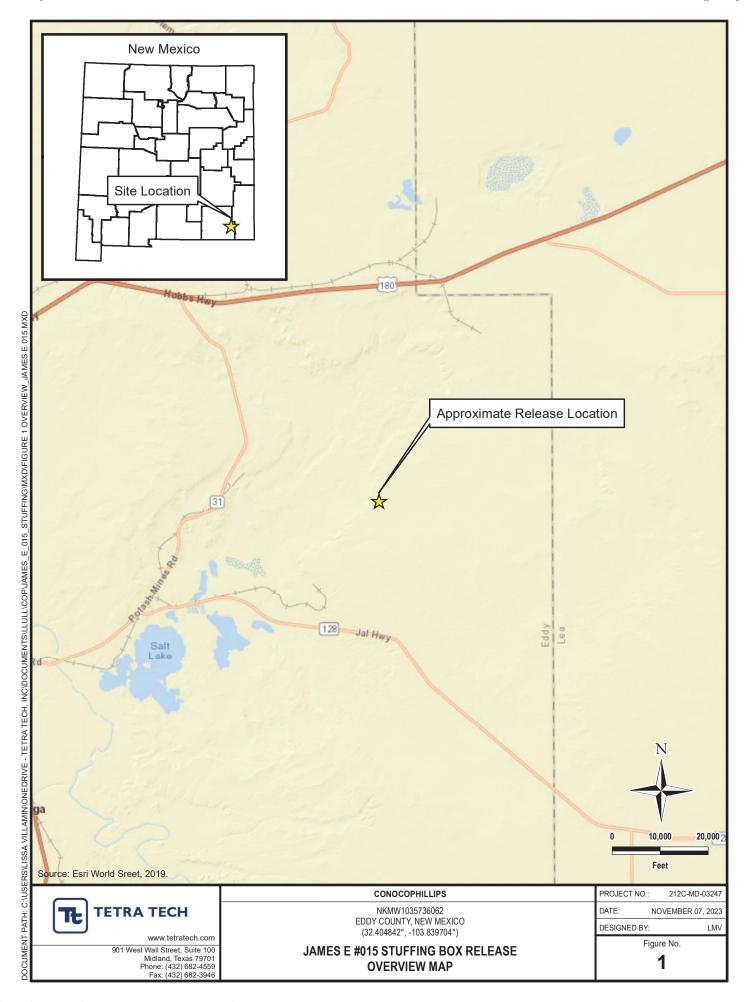
Appendix B – Site Characterization Data

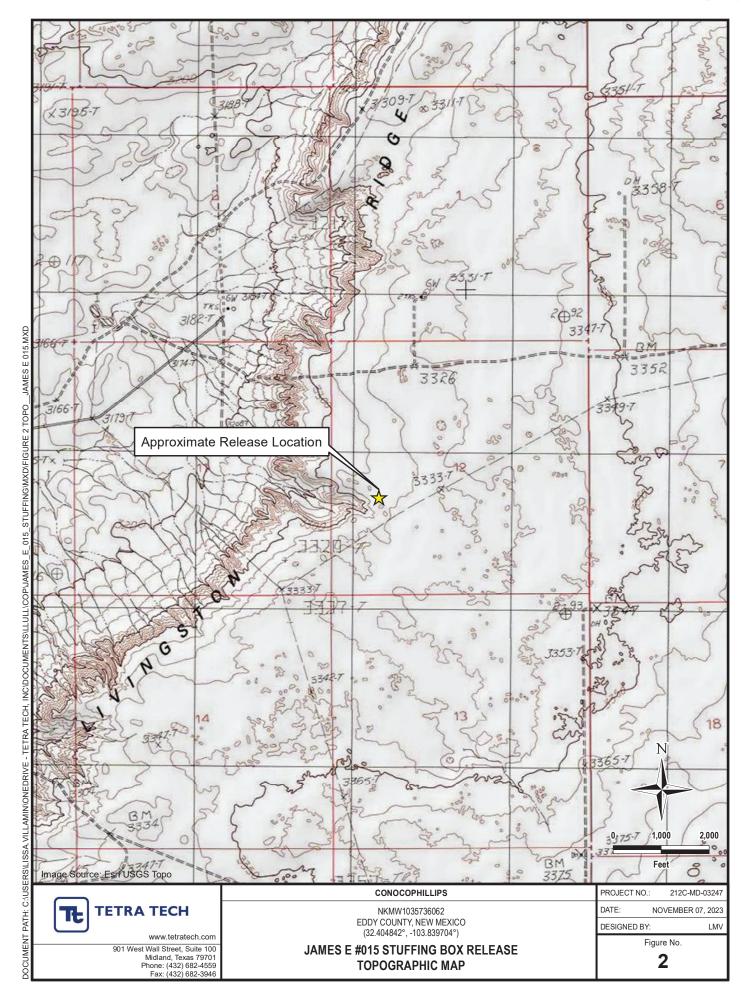
Appendix C – Regulatory Correspondence

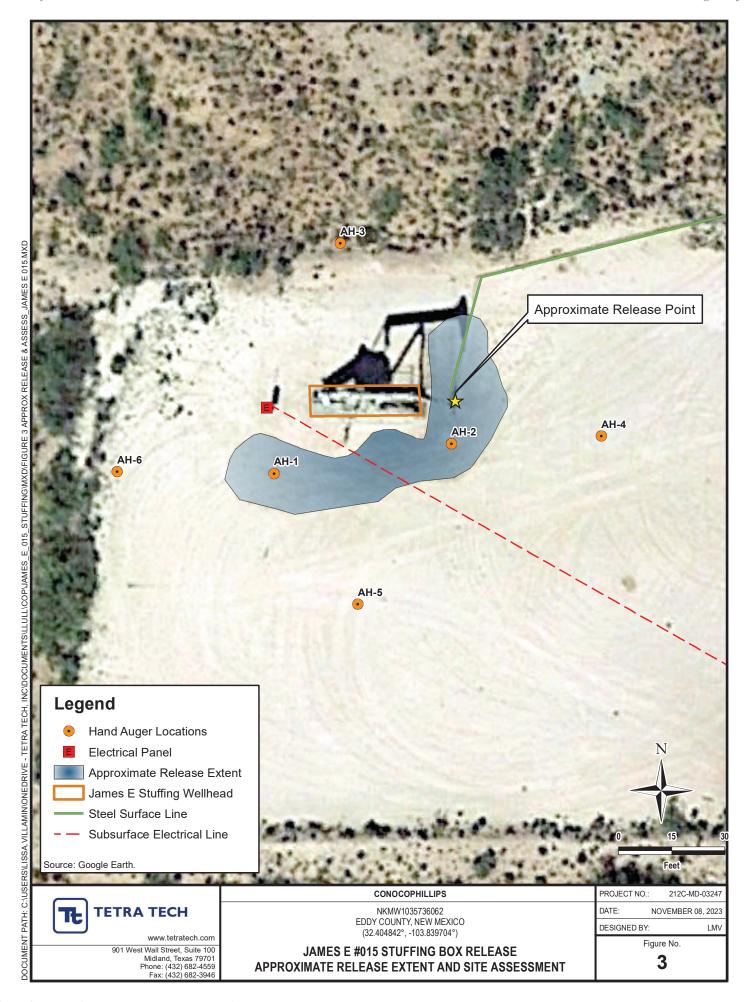
Appendix D – Photographic Documentation

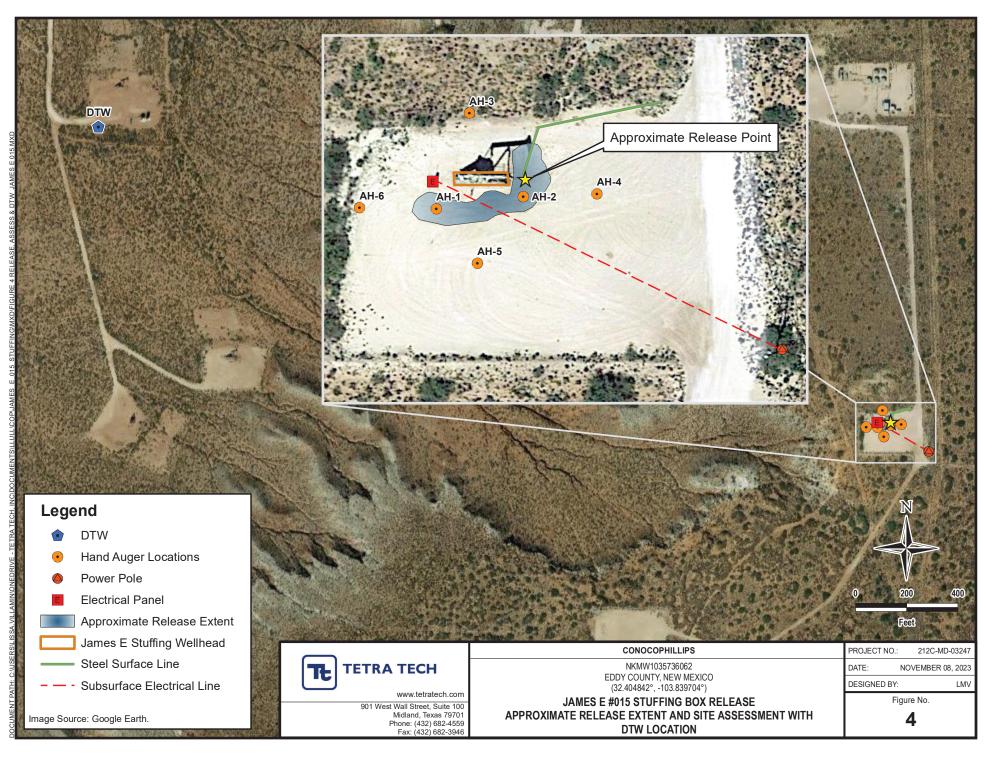
Appendix E – Laboratory Analytical Data

FIGURES









TABLES

TABLE 1 SUMMARY OF ANALYTICAL RESULTS 2023 SOIL ASSESSMENT- NKMW1035736062 CONOCOPHILLIPS JAMES E WELL #15 STUFFING BOX EDDY COUNTY, NM

19.15.29.12 N	NMAC Closure Criteria f	or Soils Impacted by a	Chlorid	les ¹	BTEX ²				TPH ³												
		Release (> 100 ft):	< 20,000 r	ng/kg	< 10 mg	/kg						< 50 mg/kg		GRO	DRO		EXT DR	20	< 2,500 mg/kg	< 1,000 mg/kg	
Sample ID Sample Date	Sample Date	Sample Depth Interval	Chlori	de	Benzei	ne	Toluen	ne	Ethylben	zene	Total Xyl	enes	Total B	TEX	C ₆ - C ₁₀	> C ₁₀ -		> C ₂₈ - (Total TPH (GRO+DRO+EXT DRO)	GRO+DRO
		ft. bgs	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg Q	mg/kg	Q	mg/kg	Q	mg/kg	mg/kg
		0-1	640		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0	<10.0		<10.0		-	-
AH-1	10/23/2023	2-3	288		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0	<10.0		<10.0		-	-
		3-4	256		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0	<10.0		<10.0		-	-
		0-1	32.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0	<10.0		<10.0		-	-
AH-2	10/23/2023	2-3	32.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0	<10.0		<10.0		-	-
		3-4	32.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0	<10.0		<10.0		-	-
AH-3	10/23/2023	0-1	32.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0	<10.0		<10.0		-	-
AH-4	10/23/2023	0-1	64.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0	<10.0		<10.0		-	-
AH-5	10/23/2023	0-1	32.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0	<10.0		<10.0		-	-
AH-6	10/23/2023	0-1	48.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0	<10.0		<10.0		-	-

NOTES:

ft. Feet

Bold and italicized values indicate exceedance of proposed RRALs and Reclamation Requirements.

bgs Below ground surface mg/kg Milligrams per kilogram

TPH Total Petroleum Hydrocarbons

GRO Gasoline range organics

DRO Diesel range organics1 Method SM4500Cl-B

2 Method 8021B

3 Method 8015M

APPENDIX A C-141 Forms

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico Energy Minerals and Natural Resources

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe. NM 87505 Form C-141 Revised October 10, 2003

Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

2 21000	24040	,				0,1111075					
D-015- &			Rela	ease Notifica	atio	n and Co	orrective A	ction			
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Name of Co	ompany Co	onocoPhillips		y 217817		Contact Jes					
			6 #247 N	fidland, TX 7970)5-5		No. (505)391-3	126			
Facility Nar	ne James	E Well #15				Facility Typ	e Oil Well				
Surface Ow	ner NMO	CD		Mineral O	wner]	BLM		Lease 1	No. 300152	7078	
				LOCA	TIO	N OF REI	LEASE.				
Unit Letter	Section	Township	Range			/South Line	Feet from the	East/West Line	County		
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		1	I.o.	titude N 32 24.99	91'	Longitud	le W 103 50.383	!	1		
			La					<u>-</u>			
Type of Rele	ase Hydro	carbons		NATU	UKE	Volume of	Release 13	Volume	Recovered 12)	
Source of Re								e5/18/2010e hbd			5/18/10
Was Immedia		Given?	Yes X	No Not Rec	luired	If YES, To			· · · · · · · · · · · · · · · · · · ·		
By Whom? J	esse Sosa					Date and H	lour 5/25/10 3:	15 pm			
Was a Watero	course Read			,		If YES, Vo	lume Impacting t	he Watercourse.			
		. Ц	Yes 🎗	No		-0					.,
If a Watercou	rse was Im	pacted, Descr	ibe Fully.	F						9	
Describe Cau			dial Action	n Taken.*				27 <u>y., n.</u>		4	2
MSO found contacted to	the stuffing pick up a	ng box had le ny free fluid	eaked. To . Total vo	tal release was 9 slume recovered v	BPW was 9	and 4 BO. M BPW 3 BO.	ASO shut powe	r off and isolated	leak, a vac	cuum	truck was
Danaih A.	. 1001	and Cleanup A			· ·					·. ·	· · · · · · · · · · · · · · · · · · ·
	ected was			ead. Notifications							
regulations al public health should their o or the environ	operators or the envir perations h ment. In a	are required to conment. The ave failed to a	o report an acceptance dequately CD accep	is true and comple id/or file certain rel e of a C-141 report investigate and rer tance of a C-141 re	ease r t by th nediat	notifications ar ne NMOCD mate te contamination	nd perform correct arked as "Final Roon that pose a thro	tive actions for rele eport" does not rele eat to ground water	eases which ieve the oper r, surface wa	may e ator o ter, hi	ndanger f liability ıman health
Cionatu	V		20				OIL CON	SERVATION	DIVISIO	N	
Signature: Printed Name	Jesse A.	Sosa	V *			Approved by	Dist ong Suppres is	Alike D.	CATTULE		
Title: HSE	R Lead					Approval Dat	e: 3/3/11	Expiration	Date:		
E-mail Addre	ss: Jesse. A	.Sosa@cono	cophillip	s.com		Conditions of			Attached	П	
Date: 05/25/2	2010		Dhana	(505)391-3126		Reme	diation per O	CD Rules &			
Attach Addit		te If Nacaca		(303)391-3120		Guidelines	S. SUBMIT RE	MEDIATION 7	—		
macu Audili		as ii incuessa	u y				L NOT LATER	THAN:	2 RP-	5	33

Bratcher, Mike, EMNRD

From: Sosa, Jesse A [Jesse.A.Sosa@conocophillips.com]

Sent:Wednesday, May 26, 2010 8:38 AMTo:'woody3210@aol.com'; Mariscal, Luis CCc:Bratcher, Mike, EMNRD; Robinson, Ron E.

Subject: James E Well #15 Attachments: James E #15.pdf

Woody, here is the C-141 for the James E #15. Please stay in contact with Mr. Bratcher on catching samples prior to back filling. I have already requested a work order. Luis should have it before too long. Any questions or problems please contact me.

Thank you,

Jesus A. Bosa

HSER Lead - Hobbs Production 1410 NW County Road Hobbs, New Mexico 88240

 Phone
 575-391-3126

 Fax
 575-391-3102

 Cell
 575-390-8251

Jesse. A. Sosa@conocophillips.com

You cannot help the poor by destroying the rich.
You cannot strengthen the weak by weakening the strong.
You cannot bring about prosperity by discouraging thrift.
You cannot lift the wage earner up by pulling the wage payer down.
You cannot further the brotherhood of man by inciting class hatred.
You cannot build character and courage by taking away people's initiative and independence.
You cannot help people permanently by doing for them, what they could and should do for themselves.

.....Abraham Lincoln

	Page 15 of	49
Incident ID	NKMW1035736062	
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?	>105 (ft bgs)						
Did this release impact groundwater or surface water?	☐ Yes 🗸 No						
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes 🗸 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)?	☐ Yes ✓ No						
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ✓ 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?	☐ Yes ✓ No						
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ✓ No						
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ✓ No						
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ✓ No						
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ✓ No						
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ✓ No						
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ✓ No						
Did the release impact areas not on an exploration, development, production, or storage site?	☐ Yes ✓ 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							

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.

✓ Photographs including date and GIS information

✓ Laboratory data including chain of custody

✓ Boring or excavation logs

✓ Topographic/Aerial maps

Received by OCD: 11/13/2023 3:33:29 PM Form C-141 State of New Mexico Page 4 Oil Conservation Division

	Page 16 of 4	19
Incident ID	NKMW1035736062	
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: Moises H Cantu Garcia	Title: Sr. Environmental Engineer						
Signature: Moises H Cantu Garcia	Date: 11/13/2023						
email: Moises.H.CantuGarcia@conocophillips.com	Telephone: 432-688-6090						
OCD Only							
Received by: Shelly Wells	Date: 11/13/2023						

Page 17 of 49

Incident ID	NKMW1035736062
District RP	2RP-533
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.

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 ru 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: Moises H Cantu Garcia Title: Sr. Environmental Engineer Signature: Moises H Cantu Garcia Telephone: 432-688-6090 Telephone: 432-688-6090 OCD Only Received by: Shelly Wells Date: 11/13/2023 Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsiparty of compliance with any other federal, state, or local laws and/or regulations.		items must be included in the closure report.							
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 ru 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: Moises H Cantu Garcia Title: Sr. Environmental Engineer Signature: Moises H Cantu Garcia Telephone: 432-688-6090 Telephone: 432-688-6090 OCD Only Received by: Shelly Wells Date: 11/13/2023 Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsiparty of compliance with any other federal, state, or local laws and/or regulations.	✓ A scaled site and sampling diagram as described in 19.15.29.	✓ A scaled site and sampling diagram as described in 19.15.29.11 NMAC							
Description of remediation activities	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)								
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD ru 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: Moises H Cantu Garcia Title: Sr. Environmental Engineer Date: 11/13/2023 Telephone: 432-688-6090 OCD Only Received by: Shelly Wells Date: 11/13/2023 Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsiparty of compliance with any other federal, state, or local laws and/or regulations.	✓ Laboratory analyses of final sampling (Note: appropriate OD	C District office must be notified 2 days prior to final sampling)							
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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: Moises H Cantu Garcia Title: Sr. Environmental Engineer Signature: Moises H Cantu Garcia Date: 11/13/2023 Telephone: 432-688-6090 OCD Only Received by: Shelly Wells Date: 11/13/2023 Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsiparty of compliance with any other federal, state, or local laws and/or regulations.									
Received by: Shelly Wells Date: 11/13/2023 Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsition party of compliance with any other federal, state, or local laws and/or regulations.	and regulations all operators are required to report and/or file certain may endanger public health or the environment. The acceptance of should their operations have failed to adequately investigate and replaced human health or the environment. In addition, OCD acceptance of compliance with any other federal, state, or local laws and/or regular restore, reclaim, and re-vegetate the impacted surface area to the coaccordance with 19.15.29.13 NMAC including notification to the Compliance. Moises H Cantu Garcia Signature: Moises H Cantu Garcia	In release notifications and perform corrective actions for releases which is a C-141 report by the OCD does not relieve the operator of liability mediate contamination that pose a threat to groundwater, surface water, a C-141 report does not relieve the operator of responsibility for actions. The responsible party acknowledges they must substantially anditions that existed prior to the release or their final land use in OCD when reclamation and re-vegetation are complete. Title: Sr. Environmental Engineer Date: 11/13/2023							
Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsition party of compliance with any other federal, state, or local laws and/or regulations.									
remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsition party of compliance with any other federal, state, or local laws and/or regulations.	OCD Only								
Closure Approved by: Utan Hall Date: 11/28/2023		Date: <u>11/13/2023</u>							
	Received by: Shelly Wells Closure approval by the OCD does not relieve the responsible party remediate contamination that poses a threat to groundwater, surface	of liability should their operations have failed to adequately investigate and water, human health, or the environment nor does not relieve the responsible							
Printed Name: Brittany Hall Title: Environmental Specialist	Received by: Shelly Wells Closure approval by the OCD does not relieve the responsible party remediate contamination that poses a threat to groundwater, surface	of liability should their operations have failed to adequately investigate and water, human health, or the environment nor does not relieve the responsible or regulations.							

APPENDIX B Site Characterization Data

OCD - Mineral & Surface Ownership



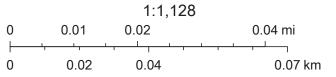
10/5/2023, 1:55:44 PM

Mineral Ownership

A-All minerals are owned by U.S.

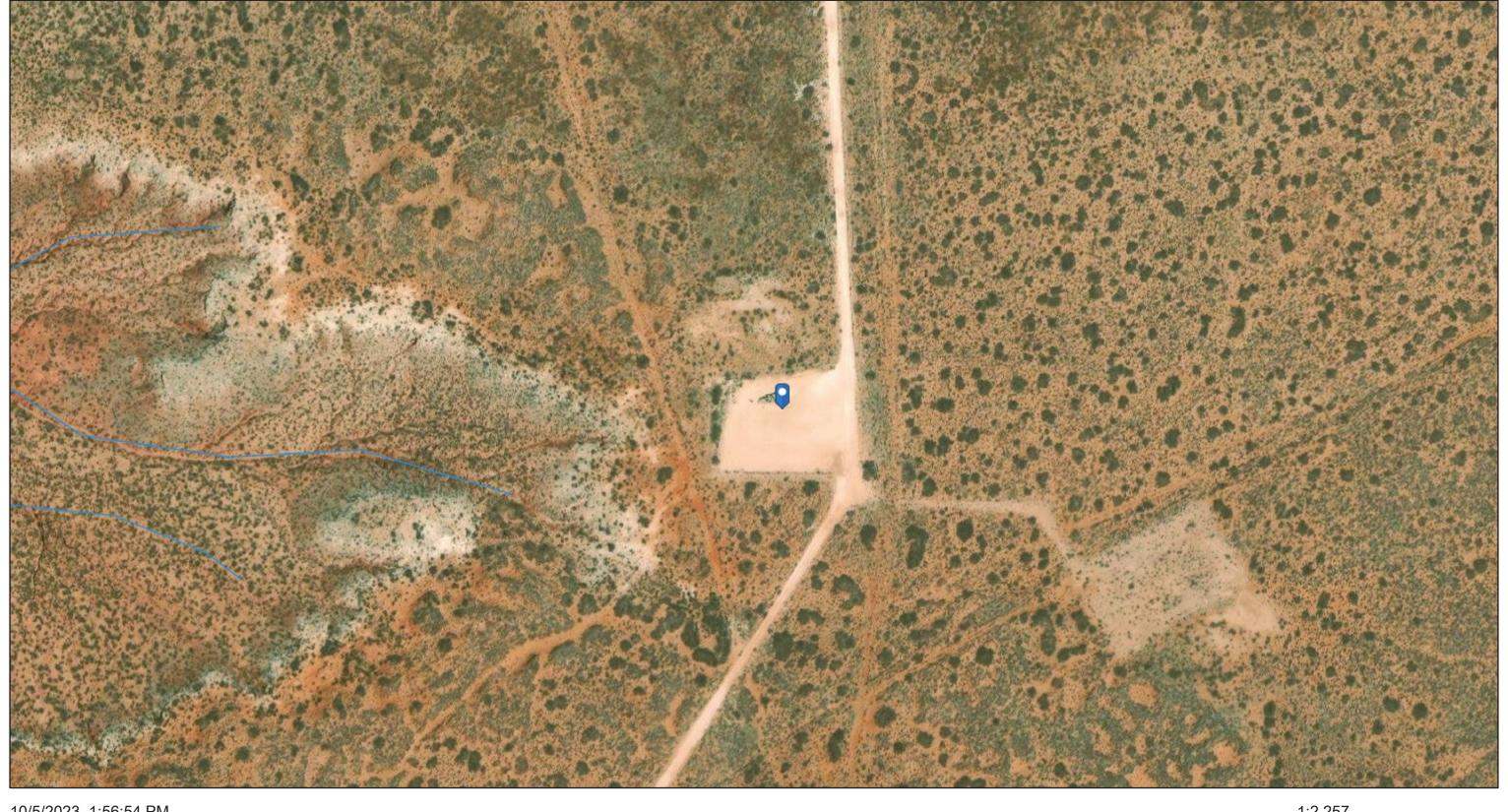
Land Ownership

BLM

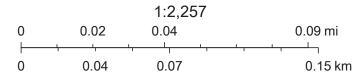


U.S. BLM, Maxar, Microsoft, Esri, HERE, Garmin, iPC

OCD - Waterbodies



10/5/2023, 1:56:54 PM OSE Streams



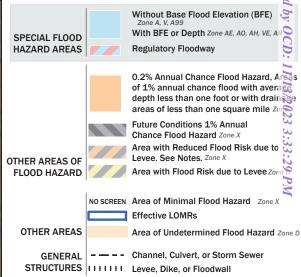
Maxar, Microsoft, Esri, HERE, Garmin, iPC, NM OSE





Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOU



20.2 Cross Sections with 1% Annual Chance Water Surface Elevation **Coastal Transect** www 5f3 www Base Flood Elevation Line (BFE) Limit of Study **Jurisdiction Boundary** -- -- Coastal Transect Baseline OTHER Profile Baseline **FEATURES** Hydrographic Feature

Digital Data Available No Digital Data Available MAP PANELS Unmapped



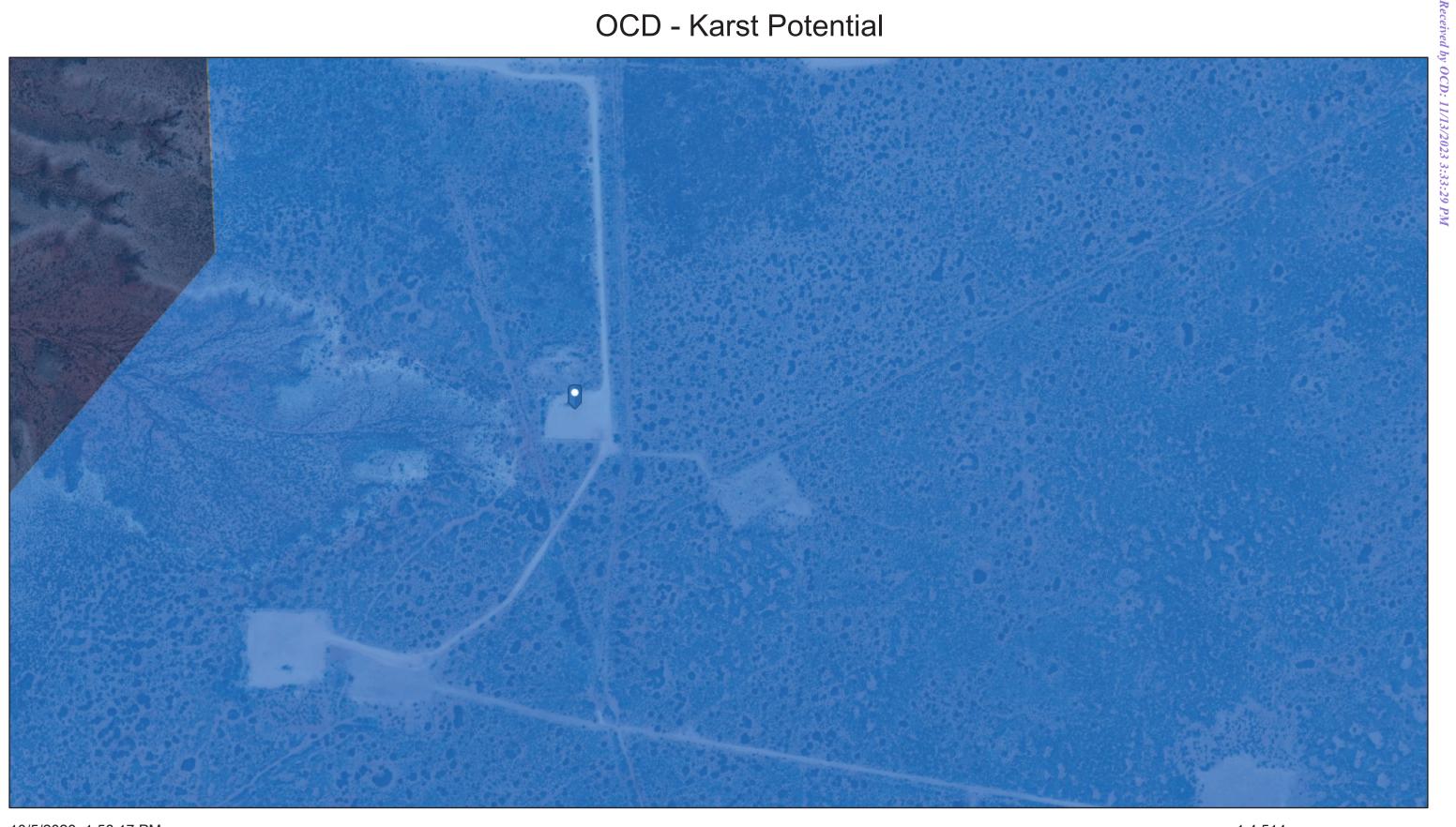
The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 11/2/2023 at 11:03 AM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

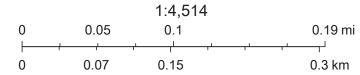
OCD - Karst Potential



10/5/2023, 1:56:17 PM Karst Occurrence Potential

High

Medium



BLM, OCD, New Mexico Tech, Esri, HERE, Garmin, iPC, Maxar



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)

	<u>'</u>	·			·	· ,
	POD Sub-	QQQ			Dept	th Depth Water
POD Number	Code basin County	64 16 4 Sec Tws	Rng X	Υ	Distance We	ell Water Column
C 04528 POD1	CUB ED	1 3 3 12 22\$	30E 608886	3585625 🌍	359	
C 02749	CUB ED	1 1 1 18 22S	31E 610556	3585146* 🌍	1627 64	10
<u>C 02750</u>	CUB ED	1 1 1 18 228	31E 610556	3585146* 🌍	1627 74	11
C 02751	CUB ED	1 1 1 18 22S	31E 610556	3585146* 🌑	1627 63	37

Average Depth to Water: -

Minimum Depth: --

Maximum Depth:

Record Count: 4

UTMNAD83 Radius Search (in meters):

Easting (X): 609115 **Northing (Y):** 3585902.93 **Radius:** 2400

*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.

WATER COLUMN/ AVERAGE DEPTH TO WATER



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) (NAI

(NAD83 UTM in meters) (In

(In feet)

POD

Sub- QQQ

Code basin County 64 16 4 Sec Tws Rng

X

E44822 🌡

Distance

Depth Depth Water Well Water Column

POD Number C 04769 POD1

CUB ED 2 1 2 21 26S 31E

615225

3544832 🌉

3694 101

Average Depth to Water: --

Minimum Depth: --

Maximum Depth: -

Record Count: 1

UTMNAD83 Radius Search (in meters):

Easting (X): 615869.33

Northing (Y): 3541194.38

Radius: 5500

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.

212C-MD-02413	TETRA.	TECH	LOC	G OF BORING James E 001 DTW	Page 1 of 2
Project Name: Ja	ames E #001 Tubing	g Line Release			l
Borehole Location:	GPS Coordinates: 32.	.408042°, -103.849478°	Surface Elev	vation (ft): 3209	
Borehole Number:	James E 001 DTV	V Bo	orehole ameter (in.):	Date Started: 2/28/2023 Date Finished:	2/28/2023
w l	RY (%)	X	While Drillir	WATER LEVEL OBSERVATIONS ng ☐ DRY ft 24 Hours After Completion of Drilling	<u>▼ DRY</u> ft
DEPTH (ft) OPERATION TYPES SAMPLE STANDARD TEST TEST	PID (Ppm) SAMPLE RECOVERY (%) MOISTURE CONTENT (%)	DRY DENSITY (pcf) LIQUID LIMIT PLASTICITY INDEX MINUS NO. 200 (%)	GRAPHIC LOG	MATERIAL DESCRIPTION (1) Head	WELL DIAGRAM
10 15 15 20 25 35 35 35 35 35 35 35	ton Acetate Liner Ilby Vane Shear California b 2222	Operation Types: Mud Rotary Continuous Flight Auge Hollow Ster Auger	-SP- SANI with trace of special solution. -SP- SANI poorly sorted solution. -SP- SANI fine-graine. -SW- SAN trace calich. -SW- SAN trace calich. -SW- SAN trace calich.	D: Reddish brown, partially cemented, fine-grained, caliche, dry. 4 D: Reddish brown, loose, coarse to fine-grained, ed, with moderate to trace caliche, dry. 8 D: Light tan to light brown, loose, coarse to d, moderatley to poorly sorted, with caliche gravel, dry. 22 ID: Light tan, loose, fine to very fine-grained, with ene, dry. 10 11 12 12 13 15 16 17 18 18 19 19 10 19 10 10 10 11 11 11 11 11 11 11 11 11 11	Bentonite Chip Seal 2" Sch. 40 PVC Casing
Logger: Colton Bicke	erstaff	Drilling Equipment:	Air Rotary	Driller: Scarborough Drilling	

212C-MD-02413	TETRA 1	TECH	LOG	OF BORING James E 001	DTW	Page 2 of 2
Project Name: Ja	ames E #001 Tubing	g Line Release				I
Borehole Location:	GPS Coordinates: 32.4	.408042°, -103.849478°	Surface Eleva	ation (ft): 3209		
Borehole Number:	James E 001 DTV	V Boi	rehole 8 meter (in.):	Date Started: 2/28/2023	Date Finished:	2/28/2023
81 -	ERY (%)	X	While Drilling	WATER LEVEL OBSERVATIO g Z DRY ft 24 Hours After Comp		<u></u> DRY ft
OPERATION TYPES SAMPLE STANDARD TEST TEST	PID (PPM) SAMPLE RECOVERY (%) MOISTURE CONTENT (%)	DRY DENSITY (pcf) F LIQUID LIMIT D PLASTICITY INDEX MINUS NO. 200 (%)	GRAPHIC LOG	MATERIAL DESCRIPTION	DEPTH (ft)	WELL DIAGRAM
60	ton Acetate Liner	Operation Types:	-SW- SANI fine-grained	Bottom of borehole at 105.0 feet. Notes: Surface elevation is an approximate	62	Trom Google
Bulk San Gra San	California	Rotary Continuous Flight Auger Hollow Stem Auger	Direct Push	Earth data.		
Logger: Colton Bicke	aretaff	Drilling Equipment	Air Rotary	Driller: Scarborough Drilling		

APPENDIX C Regulatory Correspondence

Chavira, Lisbeth

From: Hall, Brittany, EMNRD < Brittany. Hall@emnrd.nm.gov>

Sent: Monday, September 25, 2023 8:33 AM To: Abbott, Sam; Enviro, OCD, EMNRD

Cc: Llull, Christian; Chavira, Lisbeth; Maxwell, Ashley, EMNRD; Llull, Christian; Chavira,

Lisbeth; Smith, Cory, EMNRD; Bratcher, Michael, EMNRD

Subject: RE: [EXTERNAL] Extension Request - Application ID 207613 (NKMW1035736062)

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

Sam,

The extension request for NKMW1035736062 is approved. The new due date is December 1, 2023.

If an approved workplan is found, it will need to have an email, stamps, etc. from the OCD that shows it was received and approved by the OCD prior to the rule change and will need to be submitted to the OCD ASAP. If the approved workplans are already uploaded into the files available on the OCD Permitting website the workplan will not need to be resubmitted.

Please let me know if you have any questions or require any additional information. Include a copy of this and all notifications in the remedial and/or closure reports to ensure the notifications are documented in the project file.

Thank you,

Brittany Hall • Environmental Specialist Environmental Bureau Projects Group EMNRD - Oil Conservation Division 1000 Rio Brazos Road | Aztec, NM 87110 505.517.5333 | Brittany.Hall@emnrd.nm.gov http://www.emnrd.nm.gov/ocd/

From: Abbott, Sam <Sam.Abbott@tetratech.com>

Sent: Friday, September 22, 2023 3:25 PM

To: Hall, Brittany, EMNRD <Brittany.Hall@emnrd.nm.gov>; Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov> Cc: Llull, Christian < Christian.Llull@tetratech.com>; Chavira, Lisbeth < LISBETH.CHAVIRA@tetratech.com>; Maxwell, Ashley, EMNRD <Ashley.Maxwell@emnrd.nm.gov>; Llull, Christian <Christian.Llull@tetratech.com>; Chavira, Lisbeth <LISBETH.CHAVIRA@tetratech.com>; Smith, Cory, EMNRD <cory.smith@emnrd.nm.gov>; Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>

Subject: [EXTERNAL] Extension Request - Application ID 207613 (NKMW1035736062)

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

Ms. Hall,

On behalf of ConocoPhillips, Tetra Tech is requesting an extension to December 1, 2023 to complete any necessary additional assessment activities and associated reporting for the James E No.015 Release site (NKMW1035736062).

A Closure Letter Report dated October 15, 2020 was rejected by the OCD on 4/18/2023 with the following comments: "Closure for this incident is not approved. The OCD requires that this release be Remediated according to 19.15.29.12 NMAC and 19.15.29 13 NMAC as they apply to this release and resubmit a closure report by 07/17/2023."

The OCD, ConocoPhillips, and Tetra Tech had a meeting on September 20, 2023 to discuss the OCD rejections of a select number of submitted closure reports associated with the Agreed Compliance Order (ACO) for open release incidents between ConocoPhillips and OCD. In this meeting, ConocoPhillips and Tetra Tech received clarification from the OCD on the closure requirements for the historical releases. Based on this meeting, ConocoPhillips will assess each remaining open release incident associated with the ACO to determine if there is an approved remediation work plan associated with the incident. If so, ConocoPhillips will proceed to perform the approved scope of work contained in the work plan. If there is not an approved work plan associated with the release incident, then ConocoPhillips will proceed with any necessary assessment and/or remediation activities in compliance with 19.15.29 NMAC.

ConocoPhillips is committed to addressing this open release incident in compliance with OCD regulations. Additional time is required to review incident records, perform additional assessment sampling if necessary, and prepare a revised report for OCD review. A complete report will be submitted to the OCD within the requested timeframe.

Thank you, Sam

Samantha Abbott, PG | Project Manager

Direct Mobile +1 (512) 739-7874 | Business +1 (512) 338-1667 | Sam.Abbott@tetratech.com

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8911 N Capital of Texas Hwy #2310 | Austin, TX 78759 | tetratech.com

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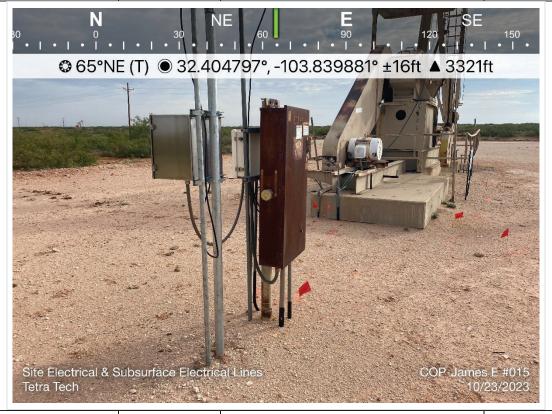
Please consider the environment before printing. Read more



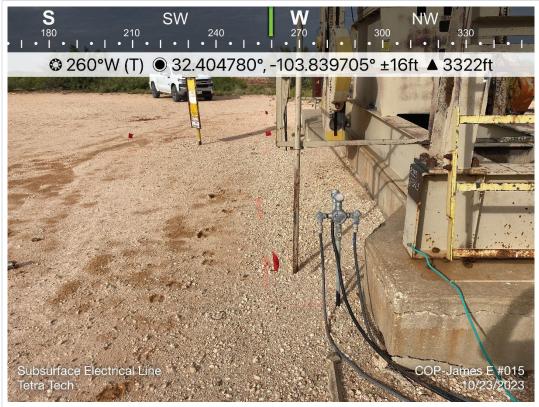
APPENDIX D Photographic Documentation



TETRA TECH, INC. PROJECT NO. 212C-MD-03247	DESCRIPTION	View north-northwest of sight signage. James E #015.	1
	SITE NAME	James E #015 Stuffing Box Release	10/23/2023



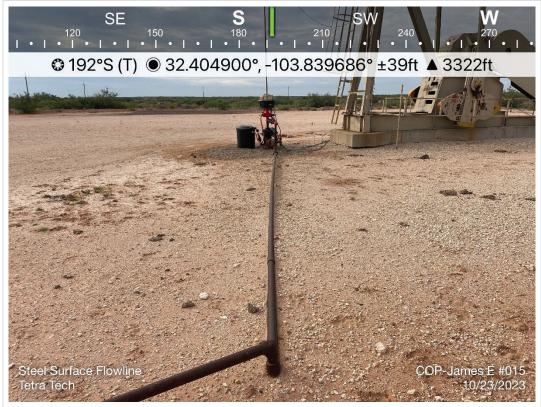
TETRA TECH, INC. PROJECT NO. 212C-MD-03247	DESCRIPTION	View east-northeast of Site electrical and subsurface electrical lines.	2
	SITE NAME	James E #015 Stuffing Box Release	10/23/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03247	DESCRIPTION	View west of subsurface electrical line.	3
	SITE NAME	James E #015 Stuffing Box Release	10/23/2023



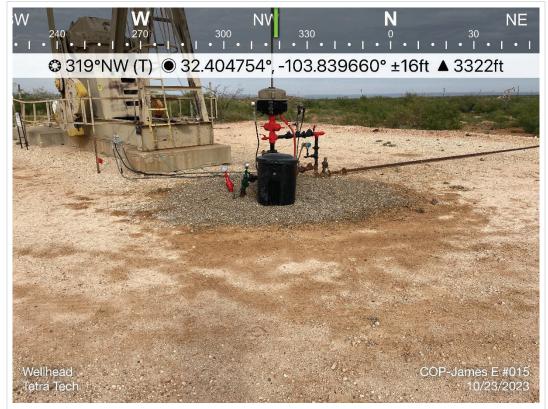
TETRA TECH, INC. PROJECT NO. 212C-MD-03247	DESCRIPTION	View south of overhead powerlines and surface polylines.	4
	SITE NAME	James E #015 Stuffing Box Release	10/23/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03247	DESCRIPTION	View south of approximate release area near wellhead. Steel surface flowline.	5
	SITE NAME	James E #015 Stuffing Box Release	10/23/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03247	DESCRIPTION	View west of approximate release area. Vertical sampling locations and pad condition.	6
	SITE NAME	James E #015 Stuffing Box Release	10/23/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03247	DESCRIPTION	View northwest of approximate release area near wellhead.	7
	SITE NAME	James E #015 Stuffing Box Release	10/23/2023

APPENDIX E Laboratory Analytical Data



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

October 31, 2023

LISBETH CHAVIRA
TETRA TECH
901 WEST WALL STREET , STE 100
MIDLAND, TX 79701

RE: JAMES E #015 STUFFING BOX RELEASE

Enclosed are the results of analyses for samples received by the laboratory on 10/24/23 12:49.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-22-15. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/ga/lab accred certif.html.

Cardinal Laboratories is accreditated 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)

Celey D. Keene

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,

Celey D. Keene

Lab Director/Quality Manager



Analytical Results For:

TETRA TECH LISBETH CHAVIRA

901 WEST WALL STREET , STE 100

MIDLAND TX, 79701

Fax To: (432) 682-3946

Received: 10/24/2023 Sampling Date: 10/23/2023

Reported: 10/31/2023 Sampling Type: Soil

Project Name: JAMES E #015 STUFFING BOX RELEASE Sampling Condition: Cool & Intact
Project Number: 212C-MD-03246 Sample Received By: Tamara Oldaker

Analyzed By: JH

Project Location: COP - EDDY COUNTY, NM

mg/kg

Sample ID: AH - 1 (0-1') (H235815-01)

BTEX 8021B

BIEX GOEID	9/	119	Andryze	u 57: 5::					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/27/2023	ND	2.05	103	2.00	2.81	
Toluene*	<0.050	0.050	10/27/2023	ND	2.03	101	2.00	2.71	
Ethylbenzene*	<0.050	0.050	10/27/2023	ND	2.06	103	2.00	2.46	
Total Xylenes*	<0.150	0.150	10/27/2023	ND	5.90	98.4	6.00	2.15	
Total BTEX	<0.300	0.300	10/27/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	96.7	% 71.5-13	4						
Chloride, SM4500CI-B	mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	640	16.0	10/27/2023	ND	432	108	400	3.64	
TPH 8015M	mg	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/26/2023	ND	182	90.9	200	1.64	
DRO >C10-C28*	<10.0	10.0	10/26/2023	ND	183	91.4	200	1.38	
EXT DRO >C28-C36	<10.0	10.0	10/26/2023	ND					
Surrogate: 1-Chlorooctane	74.1	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	73.6	% 49.1-14	8						

Cardinal Laboratories *=Accredited Analyte

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 client for analyses. All claims, including those for negligence and any other cause whistoever shall be deemed waived unless made in writing and received by Cardinal within thirty (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 pervices hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene



Analytical Results For:

TETRA TECH LISBETH CHAVIRA

901 WEST WALL STREET, STE 100

MIDLAND TX, 79701

Fax To: (432) 682-3946

Received: 10/24/2023 Sampling Date: 10/23/2023

Reported: 10/31/2023 Sampling Type: Soil

Project Name: JAMES E #015 STUFFING BOX RELEASE Sampling Condition: Cool & Intact
Project Number: 212C-MD-03246 Sample Received By: Tamara Oldaker

Applyzod By: 1H

Project Location: COP - EDDY COUNTY, NM

Sample ID: AH - 1 (2'-3') (H235815-02)

RTFY 8021R

BIEX 8021B	mg	/ kg	Anaiyze	a BA: TH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/27/2023	ND	2.05	103	2.00	2.81	
Toluene*	<0.050	0.050	10/27/2023	ND	2.03	101	2.00	2.71	
Ethylbenzene*	<0.050	0.050	10/27/2023	ND	2.06	103	2.00	2.46	
Total Xylenes*	<0.150	0.150	10/27/2023	ND	5.90	98.4	6.00	2.15	
Total BTEX	<0.300	0.300	10/27/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	96.8	% 71.5-13	4						
Chloride, SM4500CI-B mg/kg		Analyze	Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	288	16.0	10/27/2023	ND	432	108	400	3.64	
TPH 8015M	mg	/kg	Analyze	Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/26/2023	ND	182	90.9	200	1.64	
DRO >C10-C28*	<10.0	10.0	10/26/2023	ND	183	91.4	200	1.38	
EXT DRO >C28-C36	<10.0	10.0	10/26/2023	ND					
Surrogate: 1-Chlorooctane	78.7	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	77.8	% 49.1-14	8						

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Celey D. Keine



Analytical Results For:

TETRA TECH LISBETH CHAVIRA

 $901~\mbox{WEST}$ WALL STREET , STE 100

MIDLAND TX, 79701

Fax To: (432) 682-3946

Received: 10/24/2023 Sampling Date: 10/23/2023

Reported: 10/31/2023 Sampling Type: Soil

Project Name: JAMES E #015 STUFFING BOX RELEASE Sampling Condition: Cool & Intact
Project Number: 212C-MD-03246 Sample Received By: Tamara Oldaker

Project Location: COP - EDDY COUNTY, NM

Sample ID: AH - 1 (3'-4') (H235815-03)

BTEX 8021B	mg	/kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/27/2023	ND	2.05	103	2.00	2.81	
Toluene*	<0.050	0.050	10/27/2023	ND	2.03	101	2.00	2.71	
Ethylbenzene*	< 0.050	0.050	10/27/2023	ND	2.06	103	2.00	2.46	
Total Xylenes*	<0.150	0.150	10/27/2023	ND	5.90	98.4	6.00	2.15	
Total BTEX	<0.300	0.300	10/27/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	96.2	% 71.5-13	4						
Chloride, SM4500Cl-B mg/kg			Analyze	Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	256	16.0	10/27/2023	ND	432	108	400	3.64	
TPH 8015M	mg	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/26/2023	ND	182	90.9	200	1.64	
DRO >C10-C28*	<10.0	10.0	10/26/2023	ND	183	91.4	200	1.38	
EXT DRO >C28-C36	<10.0	10.0	10/26/2023	ND					
Surrogate: 1-Chlorooctane	74.4	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	72.9	% 49.1-14	8						

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Celey D. Keine



Analytical Results For:

TETRA TECH LISBETH CHAVIRA

901 WEST WALL STREET, STE 100

MIDLAND TX, 79701

Fax To: (432) 682-3946

Received: 10/24/2023 Sampling Date: 10/23/2023

Reported: Sampling Type: Soil 10/31/2023

Project Name: JAMES E #015 STUFFING BOX RELEASE Sampling Condition: Cool & Intact Project Number: Sample Received By: 212C-MD-03246 Tamara Oldaker

Project Location: COP - EDDY COUNTY, NM

Sample ID: AH - 2 (0-1') (H235815-04)

BTEX 8021B	mg/	/kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/27/2023	ND	2.05	103	2.00	2.81	
Toluene*	<0.050	0.050	10/27/2023	ND	2.03	101	2.00	2.71	
Ethylbenzene*	<0.050	0.050	10/27/2023	ND	2.06	103	2.00	2.46	
Total Xylenes*	<0.150	0.150	10/27/2023	ND	5.90	98.4	6.00	2.15	
Total BTEX	<0.300	0.300	10/27/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	96.7	% 71.5-13	4						
Chloride, SM4500Cl-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	10/27/2023	ND	432	108	400	3.64	
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/26/2023	ND	182	90.9	200	1.64	
DRO >C10-C28*	<10.0	10.0	10/26/2023	ND	183	91.4	200	1.38	
EXT DRO >C28-C36	<10.0	10.0	10/26/2023	ND					
Surrogate: 1-Chlorooctane	59.8	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	59.8	% 49.1-14	8						

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Celecy D. Freene



Analytical Results For:

TETRA TECH LISBETH CHAVIRA

901 WEST WALL STREET , STE 100

MIDLAND TX, 79701

Fax To: (432) 682-3946

Received: 10/24/2023 Sampling Date: 10/23/2023

Reported: 10/31/2023 Sampling Type: Soil

Project Name: JAMES E #015 STUFFING BOX RELEASE Sampling Condition: Cool & Intact
Project Number: 212C-MD-03246 Sample Received By: Tamara Oldaker

Applyzod By: 1H

Project Location: COP - EDDY COUNTY, NM

Sample ID: AH - 2 (2'-3') (H235815-05)

RTFY 8021R

BIEX 8021B	mg	/кд	Anaiyze	a BA: TH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/27/2023	ND	2.05	103	2.00	2.81	
Toluene*	<0.050	0.050	10/27/2023	ND	2.03	101	2.00	2.71	
Ethylbenzene*	<0.050	0.050	10/27/2023	ND	2.06	103	2.00	2.46	
Total Xylenes*	<0.150	0.150	10/27/2023	ND	5.90	98.4	6.00	2.15	
Total BTEX	<0.300	0.300	10/27/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	96.5	% 71.5-13	4						
Chloride, SM4500CI-B mg/kg		Analyze	Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	10/27/2023	ND	432	108	400	3.64	
TPH 8015M	mg,	/kg	Analyze	Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/26/2023	ND	182	90.9	200	1.64	
DRO >C10-C28*	<10.0	10.0	10/26/2023	ND	183	91.4	200	1.38	
EXT DRO >C28-C36	<10.0	10.0	10/26/2023	ND					
Surrogate: 1-Chlorooctane	73.1	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	72.8	% 49.1-14	8						

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Celey D. Keene



Analytical Results For:

TETRA TECH LISBETH CHAVIRA

901 WEST WALL STREET, STE 100

MIDLAND TX, 79701

Fax To: (432) 682-3946

Received: 10/24/2023 Sampling Date: 10/23/2023

Reported: Sampling Type: Soil 10/31/2023

Project Name: JAMES E #015 STUFFING BOX RELEASE Sampling Condition: Cool & Intact Project Number: 212C-MD-03246 Sample Received By: Tamara Oldaker

Project Location: COP - EDDY COUNTY, NM

Sample ID: AH - 2 (3'-4') (H235815-06)

BTEX 8021B	mg/	/kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/27/2023	ND	2.05	103	2.00	2.81	
Toluene*	<0.050	0.050	10/27/2023	ND	2.03	101	2.00	2.71	
Ethylbenzene*	<0.050	0.050	10/27/2023	ND	2.06	103	2.00	2.46	
Total Xylenes*	<0.150	0.150	10/27/2023	ND	5.90	98.4	6.00	2.15	
Total BTEX	<0.300	0.300	10/27/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	95.5	% 71.5-13	4						
Chloride, SM4500Cl-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	10/27/2023	ND	432	108	400	3.64	
TPH 8015M	mg/	/kg	Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/27/2023	ND	182	90.9	200	1.64	
DRO >C10-C28*	<10.0	10.0	10/27/2023	ND	183	91.4	200	1.38	
EXT DRO >C28-C36	<10.0	10.0	10/27/2023	ND					
Surrogate: 1-Chlorooctane	70.8	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	72.0	% 49.1-14	8						

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Celey D. Keine



Analytical Results For:

TETRA TECH LISBETH CHAVIRA

901 WEST WALL STREET, STE 100

MIDLAND TX, 79701

Fax To: (432) 682-3946

Received: 10/24/2023 Sampling Date: 10/23/2023

Reported: 10/31/2023 Sampling Type: Soil

Project Name: JAMES E #015 STUFFING BOX RELEASE Sampling Condition: Cool & Intact
Project Number: 212C-MD-03246 Sample Received By: Tamara Oldaker

Applyzod By: 1H

Project Location: COP - EDDY COUNTY, NM

Sample ID: AH - 3 (0-1') (H235815-07)

RTFY 8021R

BIEX 8021B	mg	/кд	Anaiyze	a BA: TH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/27/2023	ND	2.05	103	2.00	2.81	
Toluene*	<0.050	0.050	10/27/2023	ND	2.03	101	2.00	2.71	
Ethylbenzene*	<0.050	0.050	10/27/2023	ND	2.06	103	2.00	2.46	
Total Xylenes*	<0.150	0.150	10/27/2023	ND	5.90	98.4	6.00	2.15	
Total BTEX	<0.300	0.300	10/27/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	97.0	% 71.5-13	4						
Chloride, SM4500CI-B mg/kg		Analyze	Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	10/27/2023	ND	432	108	400	3.64	
TPH 8015M	mg	/kg	Analyze	zed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/27/2023	ND	182	90.9	200	1.64	
DRO >C10-C28*	<10.0	10.0	10/27/2023	ND	183	91.4	200	1.38	
EXT DRO >C28-C36	<10.0	10.0	10/27/2023	ND					
Surrogate: 1-Chlorooctane	70.9	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	72.3	% 49.1-14	8						

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Celey D. Keene



Analytical Results For:

TETRA TECH LISBETH CHAVIRA

901 WEST WALL STREET, STE 100

MIDLAND TX, 79701

Fax To: (432) 682-3946

Received: 10/24/2023 Sampling Date: 10/23/2023

Reported: Sampling Type: Soil 10/31/2023

Project Name: JAMES E #015 STUFFING BOX RELEASE Sampling Condition: Cool & Intact Project Number: Sample Received By: 212C-MD-03246 Tamara Oldaker

Project Location: COP - EDDY COUNTY, NM

Sample ID: AH - 4 (0-1') (H235815-08)

BTEX 8021B	mg/	/kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/27/2023	ND	2.05	103	2.00	2.81	
Toluene*	<0.050	0.050	10/27/2023	ND	2.03	101	2.00	2.71	
Ethylbenzene*	<0.050	0.050	10/27/2023	ND	2.06	103	2.00	2.46	
Total Xylenes*	<0.150	0.150	10/27/2023	ND	5.90	98.4	6.00	2.15	
Total BTEX	<0.300	0.300	10/27/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	95.9	% 71.5-13	4						
Chloride, SM4500Cl-B	mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	10/27/2023	ND	432	108	400	3.64	
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/27/2023	ND	182	90.9	200	1.64	
DRO >C10-C28*	<10.0	10.0	10/27/2023	ND	183	91.4	200	1.38	
EXT DRO >C28-C36	<10.0	10.0	10/27/2023	ND					
Surrogate: 1-Chlorooctane	56.3	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	57.0	% 49.1-14	8						

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Analytical Results For:

TETRA TECH LISBETH CHAVIRA

901 WEST WALL STREET, STE 100

MIDLAND TX, 79701

Fax To: (432) 682-3946

Received: 10/24/2023 Sampling Date: 10/23/2023

Reported: 10/31/2023 Sampling Type: Soil

Project Name: JAMES E #015 STUFFING BOX RELEASE Sampling Condition: Cool & Intact
Project Number: 212C-MD-03246 Sample Received By: Tamara Oldaker

Applyzod By: 1H

Project Location: COP - EDDY COUNTY, NM

Sample ID: AH - 5 (0-1') (H235815-09)

RTFY 8021R

BIEX 8021B	mg	/ kg	Anaiyze	a BA: TH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/27/2023	ND	2.05	103	2.00	2.81	
Toluene*	<0.050	0.050	10/27/2023	ND	2.03	101	2.00	2.71	
Ethylbenzene*	<0.050	0.050	10/27/2023	ND	2.06	103	2.00	2.46	
Total Xylenes*	<0.150	0.150	10/27/2023	ND	5.90	98.4	6.00	2.15	
Total BTEX	<0.300	0.300	10/27/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	96.8	% 71.5-13	4						
Chloride, SM4500CI-B mg/kg			Analyze	Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	10/27/2023	ND	432	108	400	3.64	
TPH 8015M	mg	/kg	Analyze	zed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/27/2023	ND	182	90.9	200	1.64	
DRO >C10-C28*	<10.0	10.0	10/27/2023	ND	183	91.4	200	1.38	
EXT DRO >C28-C36	<10.0	10.0	10/27/2023	ND					
Surrogate: 1-Chlorooctane	75.7	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	77.9	% 49.1-14	8						

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Celey & Keene



Analytical Results For:

TETRA TECH LISBETH CHAVIRA

901 WEST WALL STREET, STE 100

MIDLAND TX, 79701

Fax To: (432) 682-3946

Received: 10/24/2023 Sampling Date: 10/23/2023

Reported: Sampling Type: Soil 10/31/2023

Project Name: JAMES E #015 STUFFING BOX RELEASE Sampling Condition: Cool & Intact Sample Received By: Project Number: 212C-MD-03246 Tamara Oldaker

Project Location: COP - EDDY COUNTY, NM

Sample ID: AH - 6 (0-1') (H235815-10)

BTEX 8021B	mg/	kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	< 0.050	0.050	10/27/2023	ND	2.05	103	2.00	2.81	
Toluene*	<0.050	0.050	10/27/2023	ND	2.03	101	2.00	2.71	
Ethylbenzene*	< 0.050	0.050	10/27/2023	ND	2.06	103	2.00	2.46	
Total Xylenes*	< 0.150	0.150	10/27/2023	ND	5.90	98.4	6.00	2.15	
Total BTEX	<0.300	0.300	10/27/2023	ND					
Surrogate: 4-Bromofluorobenzene (PID	97.1 9	% 71.5-13	4						
Chloride, SM4500CI-B	mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	10/27/2023	ND	432	108	400	3.64	
TPH 8015M	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/27/2023	ND	182	90.9	200	1.64	
DRO >C10-C28*	<10.0	10.0	10/27/2023	ND	183	91.4	200	1.38	
EXT DRO >C28-C36	<10.0	10.0	10/27/2023	ND					
Surrogate: 1-Chlorooctane	69.5	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	69.0	% 49.1-14	8						

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Celey D. Keene



Notes and Definitions

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

Cardinal Laboratories *=Accredited Analyte

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 client for analyses. All claims, including those for negligence and any other cause whistoever shall be deemed waived unless made in writing and received by Cardinal within thirty (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 the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results related only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keine

Sampler - UPS - Bus - Other:

Sample Condition
Cool Intact
Cool Intact
Cool Intact
No I No

CHECKED BY: ('nitials)

Rush: NO, N/A

eter ID #113 Factor -0.5°C

No No

REMARKS:

Relinquished By:

Relinquished By: Colton Bickerstaff

Date: 10/24/23

Received By

Verbal Result: ☐ Yes ☐ No Add'I Phone #:
All Results are emailed. Please provide Email address: Lisbeth.Chavira@tetratech.com

AH-6 (0-1")

10/23/2023

CARDINALLaboratories

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Lab I.D. Project Location: Eddy County, New Mexico Project Name: James E #015 Stuffing Box Release Project Manager: Lisbeth Chavira Company Name: Tetra Tech Sampler Name: Colton Bickerstaff Project #: Phone #: Address: 8911 Capital o Texas Hwy, Suite 2310 4235815 AH-1 (0-1') AH-1 (2'-3') AH-2 (3'-4') AH-2 (2'-3') AH-1 (3'-4') AH-4 (0-1") AH-3 (0-1") AH-2 (0-1") AH-5 (0-1') 212C-MD-03246 (512)565-0190 101 East Marland, Hobbs, NM 88240 (575) 393-2326 FAX (575) 393-2476 Sample I.D. Fax #: Project Owner: State: X 9 Zip: GROUNDWATER ConocoPhillips SLUDGE OTHER City: State: P.O. #: Fax #: Phone #: Address: EMAIL Attn: Lisbeth Chavira Company: Tetra Tech ACID/BASE ICE / COO OTHER BILL TO Zip: 10/23/2023 10/23/2023 10/23/2023 10/23/2023 10/23/2023 10/23/2023 10/23/2023 0/23/2023 0/23/2023 TIME **TPH 8015M BTEX 8021B** Chloride SM4500CI-B ANALYSIS REQUEST

† Cardinal cannot accept verbal changes. Please email changes to celey.keene@cardinallabsnm.com

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

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 285121

CONDITIONS

Operator:	OGRID:
CONOCOPHILLIPS COMPANY	217817
600 W. Illinois Avenue	Action Number:
Midland, TX 79701	285121
	Action Type:
	[C-141] Release Corrective Action (C-141)

CONDITIONS

Crea	d Condition	Condition Date
Ву		
bh	Closure approved. Site will need to meet the requirements of 19.15.9.13 NMAC at time of plugging and abandonment.	11/28/2023