

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

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

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

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party	OGRID
Contact Name	Contact Telephone
Contact email	Incident # (assigned by OCD)
Contact mailing address	

Location of Release Source

Latitude \_\_\_\_\_ Longitude \_\_\_\_\_  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	Site Type
Date Release Discovered	API# (if applicable)

Unit Letter	Section	Township	Range	County

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

Nature and Volume of Release

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

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input 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

Incident ID	
District RP	
Facility ID	
Application ID	

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

### Initial Response

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

<input type="checkbox"/> The source of the release has been stopped.	
<input type="checkbox"/> The impacted area has been secured to protect human health and the environment.	
<input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.	
<input type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why:	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
Printed Name _____	Title: _____
Signature: <u>Patricia Espinoza</u>	Date: _____
email: _____	Telephone: _____
<b><u>OCD Only</u></b>	
Received by: _____	Date: _____

Spill Calculation - On-Pad Surface Pool Spill										
Received by OCD: 3/7/2024 8:57:48 AM	Page 3 of 78									
Convert Irregular shape into a series of rectangles	Length (ft.)	Width (ft.)	Average Depth (in.)	Estimated Pool Area (sq. ft.)	Estimated volume of each pool area (bbl.)	Penetration allowance (ft.)	Total Estimated Volume of Spill (bbl.)	Percentage of Oil if Spilled Fluid is a Mixture (%)	Total Estimated Volume of Spilled Oil (bbl.)	Total Estimated Volume of Spilled Liquid other than Oil (bbl.)
Rectangle A	12	6	0.3	72.00	0.27	0.00	0.27	30%	0.08	0.19
Rectangle B	4	6	0.3	24.00	0.09	0.00	0.09		0.03	0.06
Rectangle C	4	6	0.3	24.00	0.09	0.00	0.09		0.03	0.06
Rectangle D				0.00	0.00	0.00	0.00		0.00	0.00
Rectangle E				0.00	0.00	0.00	0.00		0.00	0.00
Rectangle F				0.00	0.00	0.00	0.00		0.00	0.00
Rectangle G				0.00	0.00	0.00	0.00		0.00	0.00
Rectangle H				0.00	0.00	0.00	0.00		0.00	0.00
Rectangle I				0.00	0.00	0.00	0.00		0.00	0.00
Rectangle J				0.00	0.00	0.00	0.00		0.00	0.00
Released to Imaging: 3/7/2024 3:10:06 PM							Total Surface Pool Volume Released, Release to Soil/Caliche:		0.4455	
									0.1336	0.3118



March 1, 2024

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

**Re: Release Characterization and Remediation Work Plan  
ConocoPhillips Company  
Windward Federal # 003H  
Unit Letter C, Section 30, Township 24 South, Range 32 East  
Lea County, New Mexico  
Incident ID# NAPP2331054136**

Sir or Madam:

Tetra Tech, Inc. (Tetra Tech) was contacted by ConocoPhillips Company (ConocoPhillips) to assess a release at the Windward Federal # 003H (API No. 30-025-41413). The release footprint is located in Public Land Survey System (PLSS) Unit Letter C, Section 30, Township 24 South, and Range 32 East, in Lea County, New Mexico (Site). The approximate release point occurred at coordinates 32.194425°, -103.716595°, as shown on Figures 1 and 2.

## BACKGROUND

According to the C-141 Initial Report, the release was discovered on October 24, 2023, and was caused by a hole in the flowline due to corrosion. Approximately 0.1336 barrels (bbls) of crude oil and 0.3118 bbls of produced water were reported released and no fluid was recovered. The release was off pad. The NMOCD approved the initial C-141 on November 6, 2023, and subsequently assigned the release the Incident ID NAPP2331054136. The initial C-141 form is included in Appendix A.

## LAND OWNERSHIP

According to the NMOCD Oil and Gas Map, the Site is located on federal lands managed by the Bureau of Land Management (BLM). The BLM will be notified prior to any remedial activities commencing for this incident.

## SITE CHARACTERIZATION

A site characterization was performed and no sinkholes, residences, schools, hospitals, institutions, churches, stream bodies, springs, playa lakes, 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 low karst potential.

According to the New Mexico Office of the State Engineer (NMOSE) reporting system, there is one well within a ½-mile (800-meter) radius of the Site, located approximately 0.24 miles (388 meters) east of the release point. This well has a total depth of 120 feet below ground surface (bgs) with no groundwater encountered. The nearest NMOSE-registered well with depth-to-water data is located (2,276 meters) from the Site and has a depth to water of 135 feet bgs. The site characterization data is included in Appendix B.

Tetra Tech

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

Tel 432.682.4559 Fax 432.682.3946 www.tetrattech.com



## 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.

Based on the site characterization 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

Additionally, in accordance with the NMOCD guidance Procedures for Implementation of the Spill Rule (19.15.29 NMAC) (September 6, 2019), the following reclamation requirements for surface soils (0-4 feet bgs) outside of active oil and gas operations are as follows:

Constituent	Reclamation Requirements
Chloride	600 mg/kg
TPH (GRO+DRO+ORO)	100 mg/kg

## SITE ASSESSMENT

On December 6, 2023, Tetra Tech was onsite to conduct assessment activities on behalf of ConocoPhillips. Assessment activities included installing three (3) hand auger borings (AH-1 through AH-3) in the release area to a total depth ranging from 2-3.5 feet bgs. Auger refusal was met at roughly between 2 and 3.5 feet bgs. Four (4) hand auger borings (AH-4 through AH-7) were installed along the perimeter of the release extent to 1-foot bgs.

Due to the dense subsurface lithology (caprock) beneath the footprint, vertical delineation was not achieved with the hand auger borings. Tetra Tech remobilized to the site on January 15, 2024, and installed two (2) trenches (T-1 and T-2) using a backhoe to evaluate the vertical extents of the release footprint. Trench T-1 was installed to 8 feet bgs and T-2 was installed to 6 feet bgs. An additional hand auger boring (AH-8) was installed to the east of the release to 1-foot bgs to complete horizontal delineation of the release. Assessment sampling locations are presented in Figure 3. Photographic documentation of the Site is included in Appendix C.

A total of twenty-two (22) soil samples were sent to Cardinal Laboratories in Hobbs, New Mexico to be analyzed for chloride via Standard Method 4500Cl-B, TPH via EPA Method 8015M, and BTEX via EPA Method 8021B. A copy of the laboratory analytical reports and chain-of-custody documentation are included in Appendix D.

An extension request for this incident was submitted to the NMOCD and approved on January 22, 2024, for a due date of April 22, 2024. Regulatory correspondence is included in Appendix E.

## SUMMARY OF RESULTS

The laboratory analytical results from the December 2023 and January 2024 assessment sampling activities are summarized in Table 1. Analytical results associated with surface soil intervals (0-4 feet bgs) at AH-1, T-1, AH-2, T-2, AH-3, and AH-7 exceeded the reclamation limit for TPH (100 mg/kg). Surface soil intervals at AH-1 and T-1 also exceeded the reclamation limit for chloride (600 mg/kg). Analytical results associated with subsurface soil intervals (greater than 4 feet bgs) exceeded the Site RRAL for Total TPH (2,500 mg/kg) as well as GRO+DRO (1,000 mg/kg) to a depth of 8 feet bgs.

Both, horizontal and vertical delineation were considered completed following the assessment activities. Horizontal delineation of the release was achieved as a result of the December 2023 and January 2024 additional assessment activities. As mentioned, trenching was required at the release site, based on the subsurface lithology. During the remobilization on January 2024, vertical delineation of TPH impacts were not fully achieved at sample location T-1. The release area is congested with active, production lines, in both the subsurface and at the surface. Trenching deeper than the 8' bgs interval was not feasible based on safety concerns from onsite personnel at T-1 associated with the energized liens.

Although the TPH concentration at the basal T-1 depth interval (7'-8') exceeded the most stringent RRAL of 100 mg/kg, the adjacent trench location (T-2), completed only 16-feet to the east, indicated TPH impact down to only 3' below grade. Thus, vertical delineation was achieved at sample location T-2 at the site. This is a clear indication that the impacts observed at T-1 are localized as a "hot spot" at that depth.

## REMEDIATION WORK PLAN

Based on the collected analytical results, ConocoPhillips proposes to remove the impacted material as shown in Figure 4. The release footprint in the area of T-1 will be excavated to an approximate depth of 8 feet below the surrounding surface or until a representative sample from the walls and bottom of the excavation is below the RRALs. During the proposed remedial activities, T-1 will be vertically delineated through floor confirmation sampling and fully remediated to Site RRALs. The release footprint in the area of T-2 will be excavated to a maximum depth of 3 feet below the surrounding surface or until a representative sample from the walls and bottom of the excavation is below the RRALs. The excavation will be conducted using heavy equipment (backhoes, hoe rams, and track hoes); however, areas in close proximity to steel surface/pressurized lines or other production equipment will be hand-dug to the maximum extent practicable and heavy equipment will come no more than 4 feet from any pressurized lines, as shown by the buffer zones in Figure 4.

Excavated soils will be transported offsite and disposed of at an NMOCD-approved or permitted facility. The responsible party will notify the OCD two (2) business days prior to conducting final confirmation sampling pursuant to 19.15.29.12.D(1)(a) NMAC, using a Notification of Sampling (C-141N) application.

Confirmation bottom and sidewall samples representative of no more than 400 square feet will be collected for verification of remedial activities, and analyzed for TPH, BTEX, and chlorides as shown in Figure 5. Once results are received, the excavation will then be backfilled with clean material to surface grade. The estimated volume of material to be remediated is approximately 89 cubic yards.

## SITE RECLAMATION AND MONITORING PLAN

Based on 19.15.29.13 NMAC, all areas disturbed by the remediation and closure will be reclaimed once confirmation sampling results below the reclamation requirements (or RRALs, respectively, for areas below 4 feet bgs) are received. Once acceptable confirmation sample results are received, the excavation will be backfilled with clean material to pre-release grade. In accordance with 19.15.29.12 NMAC, the reclaimed area will contain a minimum of 4 feet of non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0 or Method 4500. The soil cover will include a top layer consisting of 1 foot of suitable material to establish vegetation at the site.

The backfilled areas in the pasture will be seeded following backfilling, to aid in revegetation. Based on the soils of the site, areas will be seeded with the BLM seed mixture for LPC Sand/Shinnery Sites to aid in

Release Characterization and Remediation Work Plan  
March 1, 2024

ConocoPhillips

revegetation will be used for seeding and will be planted in the amount specified in the pounds pure live seed (PLS) per acre. The seed mixture will be spread by a drill equipped with a depth regulator or a hand-held broadcaster and raked. If a hand-held broadcaster is used for dispersal, the pounds pure live seed per acre will be doubled.

Reclamation activities will be implemented in consultation with the BLM. ConocoPhillips will notify the BLM when reclamation and revegetation are complete.

## CONCLUSION

Based on the results of the 2023 and 2024 release assessment and characterization, ConocoPhillips will remediate soils within the release extent impacted with chlorides and TPH above Site RRALs and reclamation limits. The proposed remediation activities will be conducted within 90 days of acceptance of the proposed plan. If you have any questions concerning the additional assessment activities for the Site or the proposed remediation work plan, please call me at (512) 596-8201 or Christian at (512) 338-2861.

Sincerely,

**Tetra Tech, Inc.**



Lisbeth Chavira  
Staff Geoscientist



Christian M. Llull, P.G.  
Program Manager

cc:  
Mr. Mr. Jacob Laird, GPBU – ConocoPhillips

## LIST OF ATTACHMENTS

### Figures:

- Figure 1 – Overview Map
- Figure 2 – Topographic Map
- Figure 3 – Approximate Release Extent and Site Assessment
- Figure 4 – Proposed Remediation Extent
- Figure 5 – Alternative Confirmation Sampling Plan

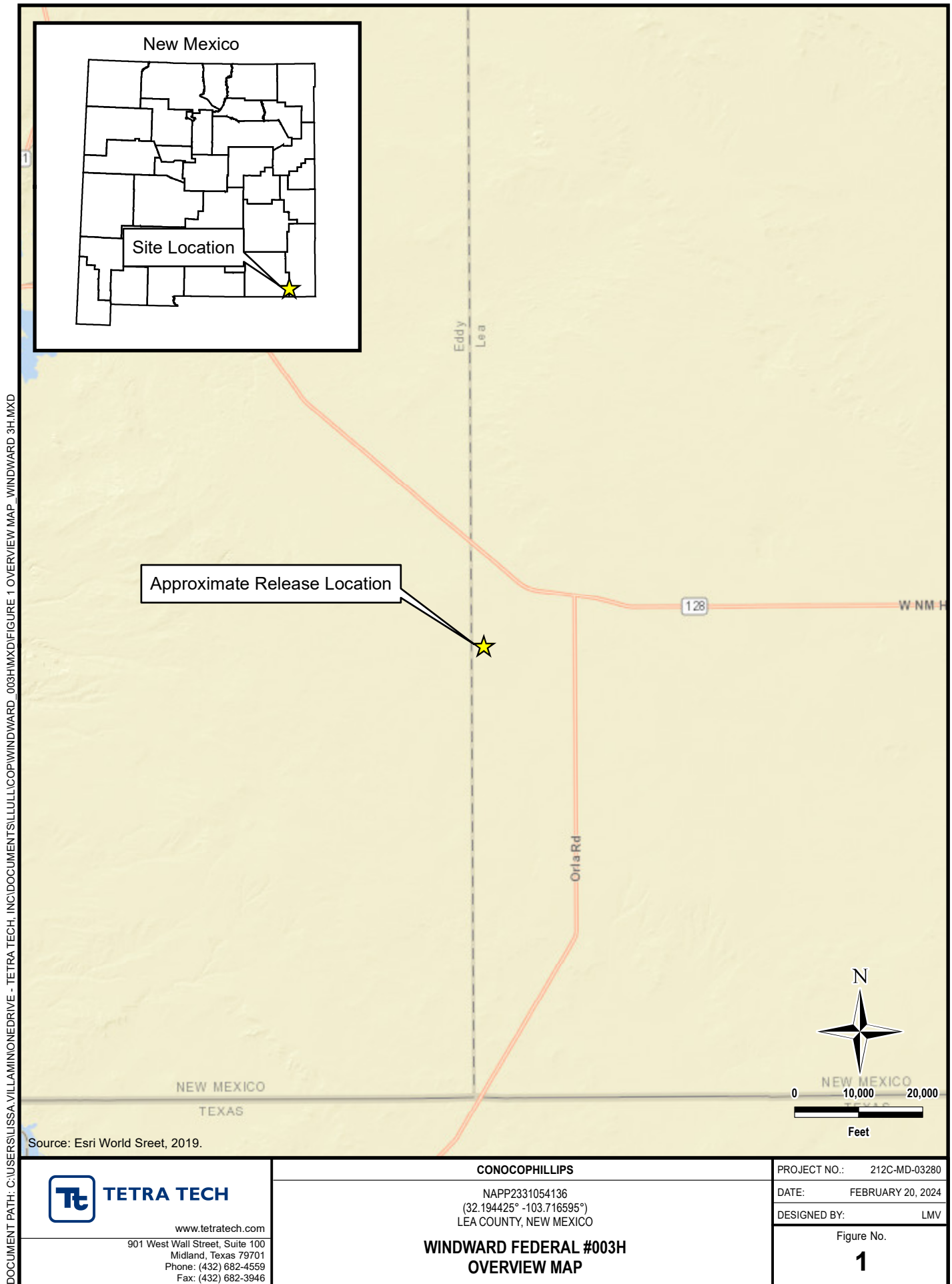
### Tables:

- Table 1 – Summary of Analytical Results – 2023 & 2024 Soil Assessment

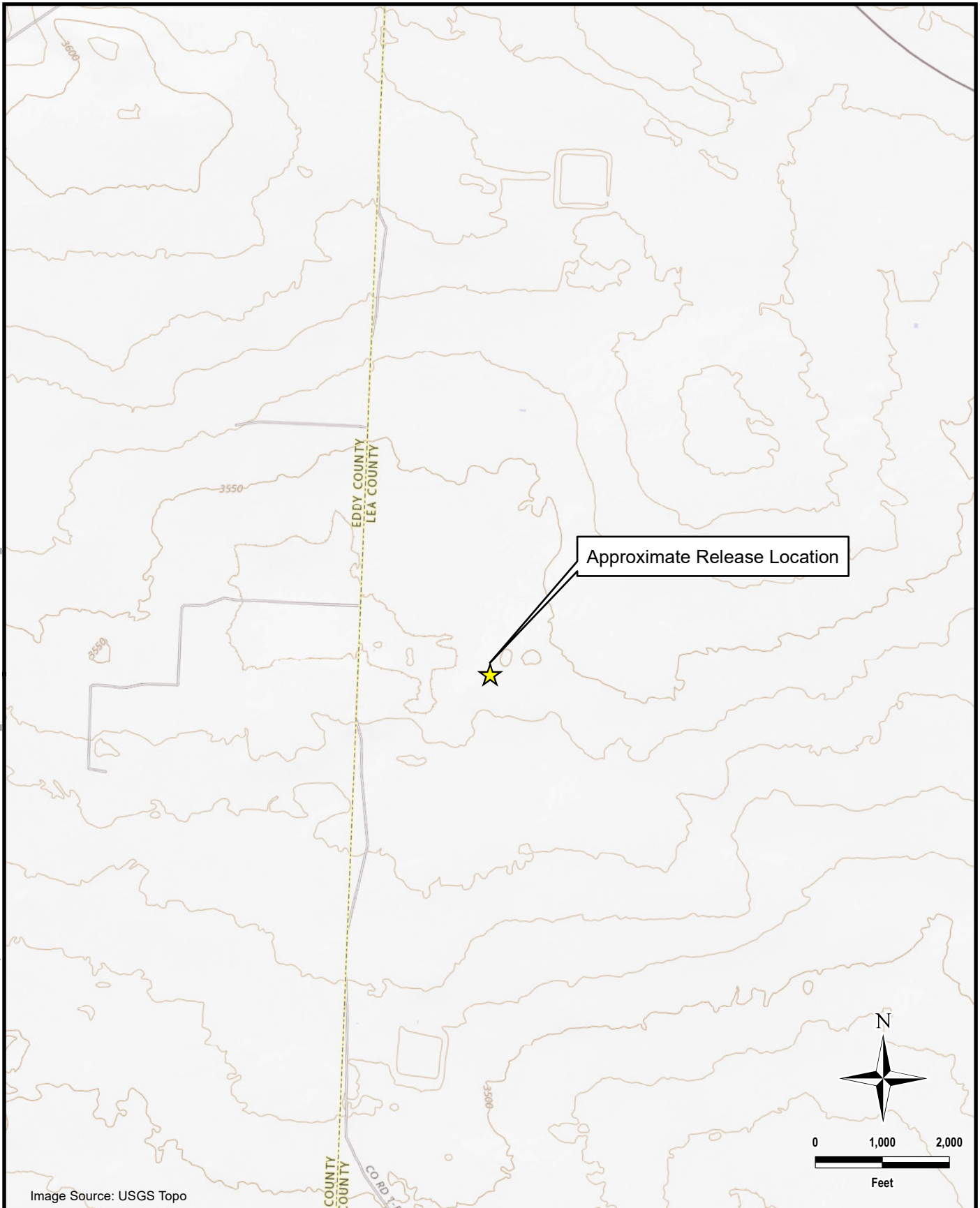
### Appendices:

- Appendix A – C-141 Forms
- Appendix B – Site Characterization Data
- Appendix C – Photographic Documentation
- Appendix D – Laboratory Analytical Data
- Appendix E – Regulatory Correspondence

## **FIGURES**



DOCUMENT PATH: C:\USERS\LISSA.VILLAMONEDRIVE - TETRA TECH, INC\DOCUMENTS\ILLUICOP\WINDWARD\_003H\MXD\FIGURE 2 TOPO MAP\_WINDWARD 3H.MXD



**TETRA TECH**

[www.tetratech.com](http://www.tetratech.com)

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

**CONOCOPHILLIPS**

NAPP2331054136  
(32.194425° -103.716595°)  
LEA COUNTY, NEW MEXICO

**WINDWARD FEDERAL #003H  
TOPOGRAPHIC MAP**

PROJECT NO.: 212C-MD-3280

DATE: FEBRUARY 20, 2024

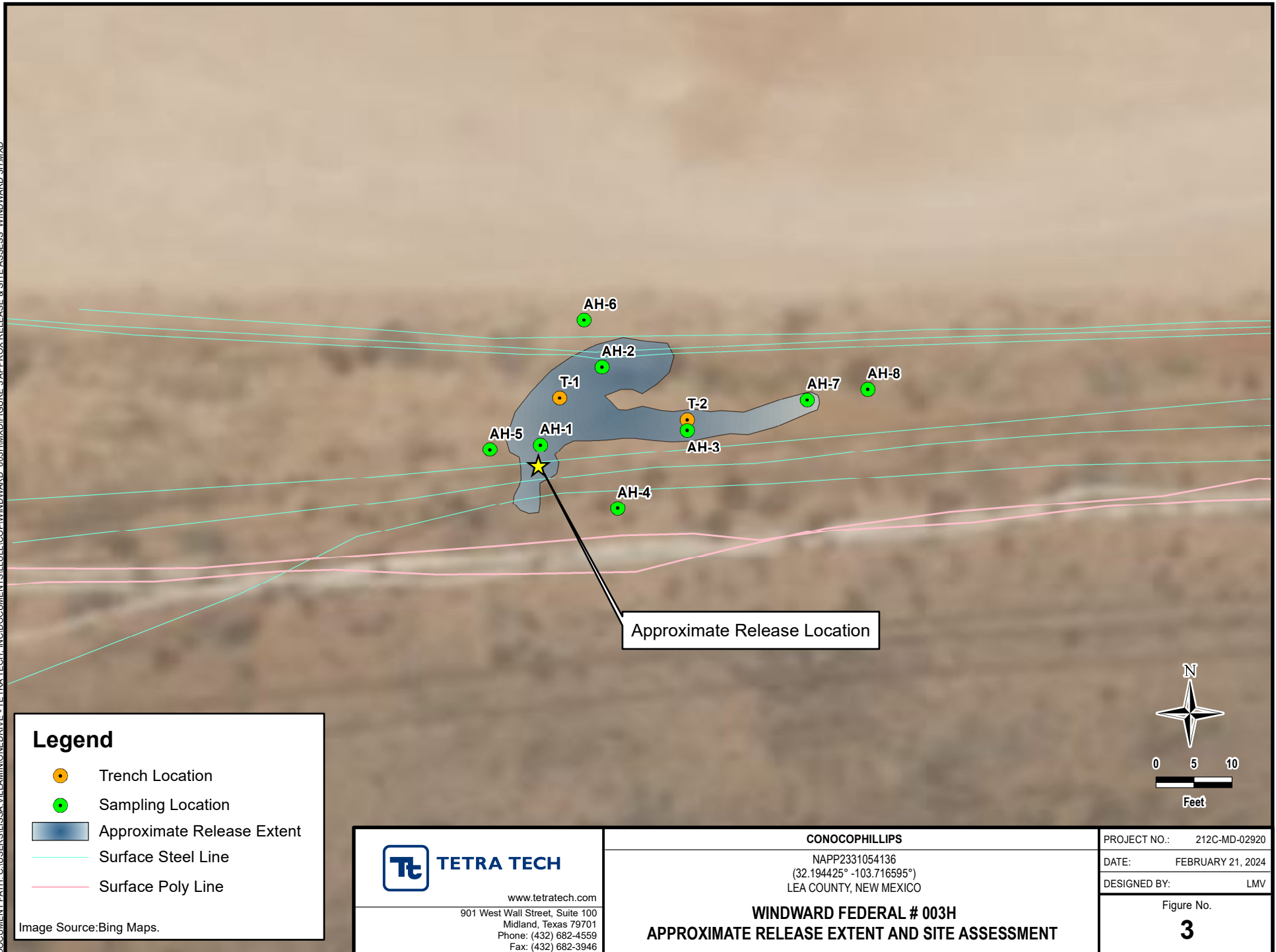
DESIGNED BY: LMV

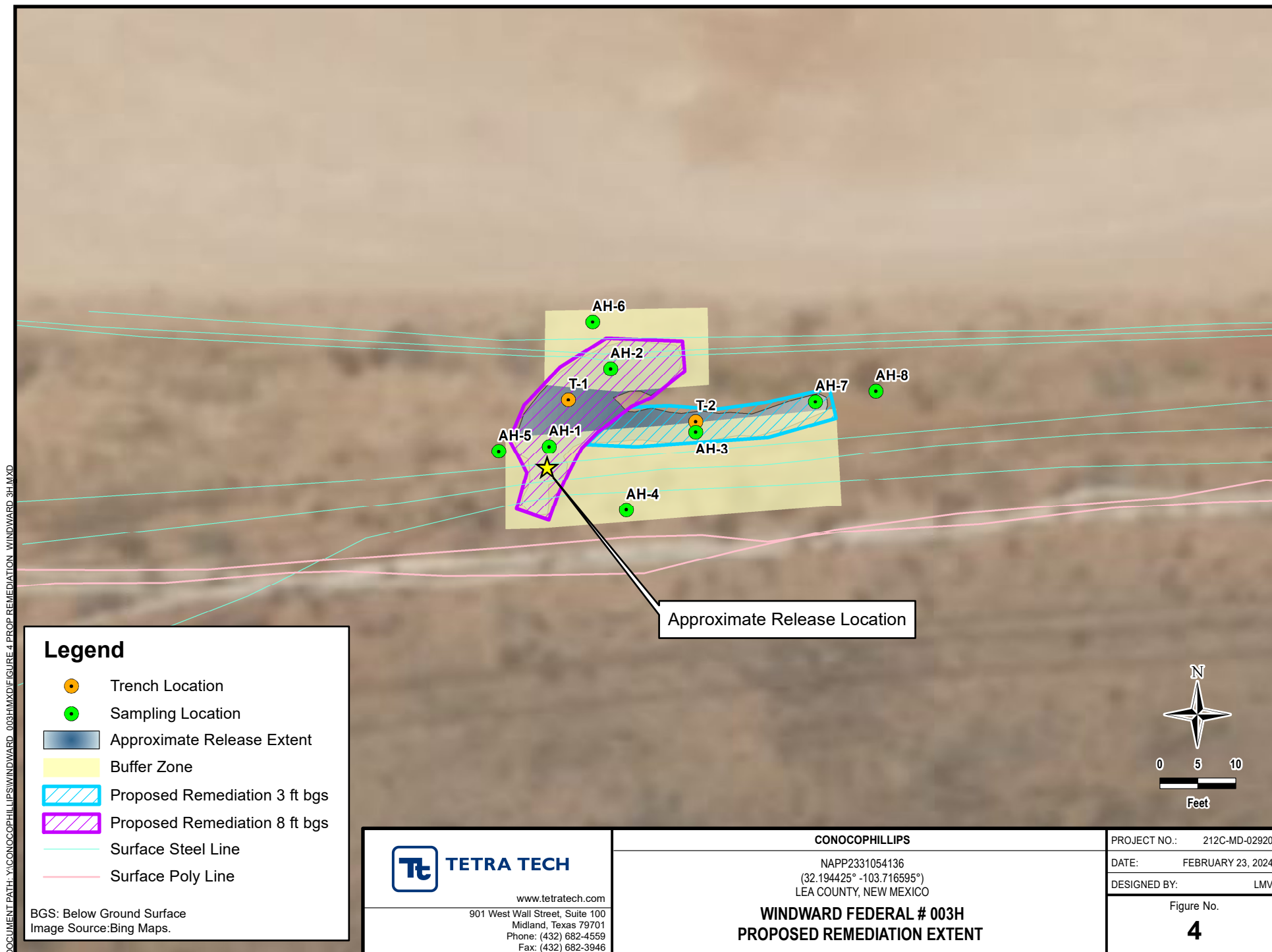
Figure No.

**2**

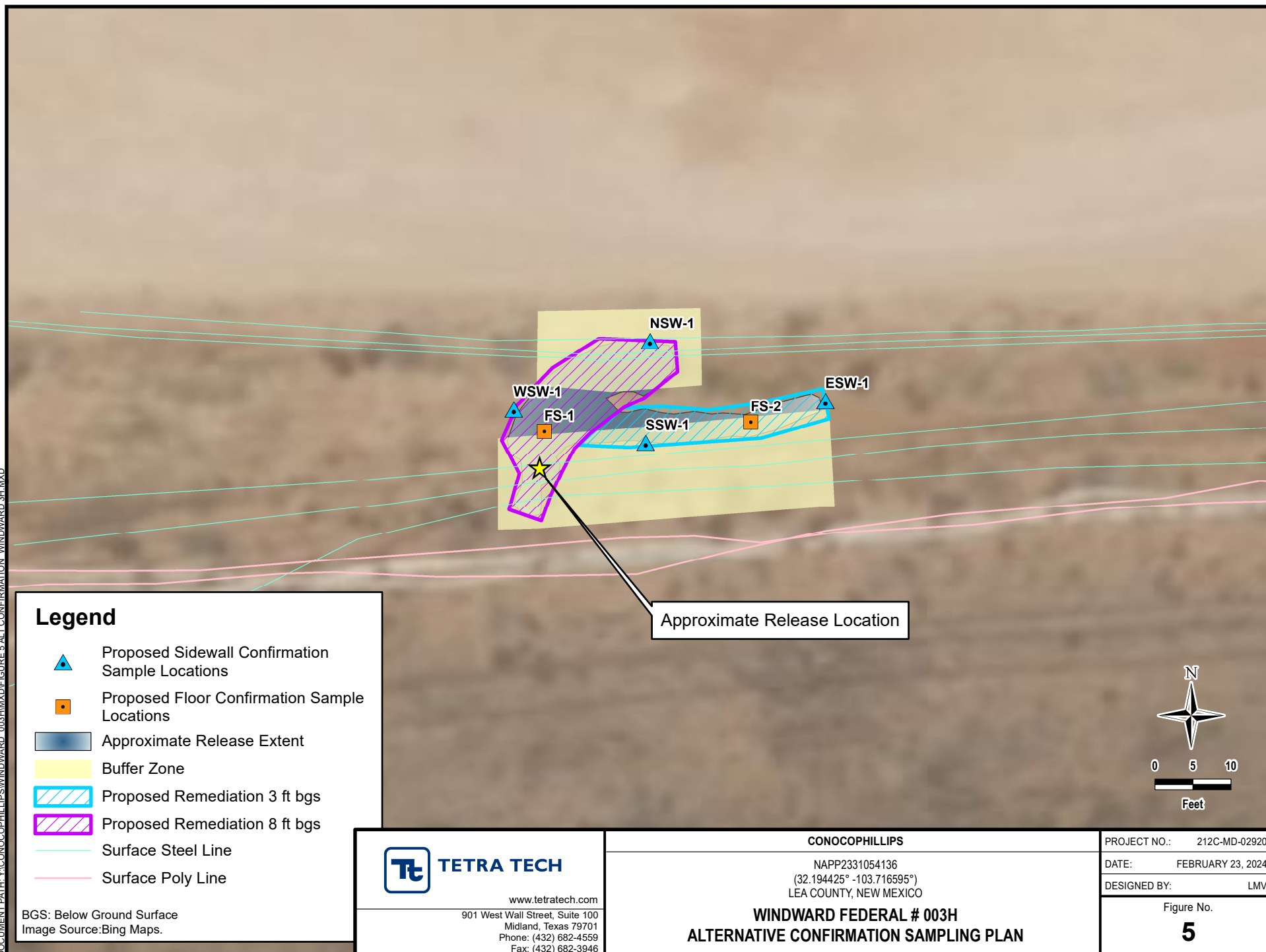


DOCUMENT PATH: C:\USERS\LUISA.VILLAMONEDRIVE - TETRA TECH, INC\DOCUMENTS\11111\11111\COP\WINDWARD\_003H.MXD\FIGURE 3 APPROX RELEASE &amp; SITE ASSESS WINDWARD 3H.MXD





DOCUMENT PATH: Y:\CONOCOPHILLIPS\WINDWARD\_003H\MXD\FIGURE 5.ALT.CONFIRMATION WINDWARD 3H.MXD



## **TABLES**

TABLE 1  
SUMMARY OF ANALYTICAL RESULTS  
2023 AND 2024 SOIL ASSESSMENT- NAPP2331054136  
CONOCOPHILLIPS  
WINDWARD FEDERAL 3H RELEASE  
LEA COUNTY, NM

19.15.29.12 NMAC Closure Criteria for Soils Impacted by a Release (> 100 ft):				Chlorides <sup>1</sup>		BTEX <sup>2</sup>										TPH <sup>3</sup>							
				< 20,000 mg/kg		< 10 mg/kg		Toluene		Ethylbenzene		Total Xylenes		< 50 mg/kg		GRO		DRO		EXT DRO		< 2,500 mg/kg	
Sample ID	Sample Date	Sample Depth Interval	Field Screening Results	Chloride		Benzene								Total BTEX								C <sub>6</sub> - C <sub>10</sub>	
			Chlorides													mg/kg	Q	mg/kg	Q	mg/kg	Q	mg/kg	Q
AH-1	12/6/2023	0-1	-	944		12.4		49.9		9.36		70.4		142		3,720		20,000		3,450		27,170	23,720
		2-3	-	992		43.2		138		31.4		178		390		7,440		13,100		2,210		22,750	20,540
		3-3.5	-	640		52.5		135		29.3		128		344		6,810		12,200		1,900		20,910	19,010
T-1	1/15/2024	0-1		480		30.4		120		32.8		197		380		7,850		12,300		1,830		21,980	20,150
		2-3		624		14.8		58.3		16.0		90.0		179		3,300		5,640		943		9,883	8,940
		3-4		304		44.9		132		30.7		141		348		7,420		12,800		2,090		22,310	20,220
		5-6		240		10.6		64.2		17.0		95.0		187		1,750		3,280		556		5,586	5,030
		7-8		112		0.249		3.30		1.58		8.10		13.2		209		994		192		1,395	1,203
AH-2	12/6/2023	0-1	-	64.0		8.35		57.6		20.6		128		215		4,540		17,700		2,680		24,920	22,240
		1-2	-	32.0		54.3		206		46.1		279		585		10,900		15,400		2,400		28,700	26,300
T-2	1/15/2024	0-1	-	48.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	-
		2-3		64.0		<0.050		0.084		0.102		0.858		1.04		108		768		121		997	876
		3-4		64.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	-
		5-6		32.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		30.3		30.3		30.3	30.3
AH-3	12/6/2023	0-1	-	32.0		7.87		151		49.3		351		560		5,970		19,100		3,000		28,070	25,070
		1-2	-	80.0		<0.050		1.10		0.731		6.50		8.33		163		1,310		221		1,694	1,473
		2-2.5	-	32.0		<0.050		0.324		0.257		2.38		2.96		68.3		1,010		183		1,261	1,078
AH-4	12/6/2023	0-1	42.1	<16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	-
AH-5	12/6/2023	0-1	36	<16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	-
AH-6	12/6/2023	0-1	110	64.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		21.0		<10.0		21.0	21.0
AH-7	12/6/2023	0-1	44.5	<16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		92		30.7		122.7	92.0
AH-8	1/15/2024	0-1		16.0		<0.050		<0.050		<0.050		<0.150		<0.300		<10.0		<10.0		<10.0		-	-

NOTES:

ft. Feet

bgs Below ground surface

mg/kg Milligrams per kilogram

TPH Total Petroleum Hydrocarbons

GRO Gasoline range organics

DRO Diesel range organics

1 Method SM4500Cl-B

2 Method 8021B

3 Method 8015M

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

Shaded rows indicate intervals proposed for excavation.

QUALIFIERS:

## **APPENDIX A C-141 Forms**

District I  
1625 N. French Dr., Hobbs, NM 88240  
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811 S. First St., Artesia, NM 88210  
District III  
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State of New Mexico  
Energy Minerals and Natural  
Resources Department  
  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

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

Incident ID	NAPP2331054136
District RP	
Facility ID	fAPP2132638253
Application ID	

Release Notification

Responsible Party

Responsible Party	COG Operating, LLC.	OGRID	229137
Contact Name	Jacob Laird	Contact Telephone	(575) 703-5482
Contact email	Jacob.Laird@ConocoPhillips.com	Incident # (assigned by OCD)	NAPP2331054136
Contact mailing address	600 West Illinois Avenue, Midland, Texas 79701		

Location of Release Source

Latitude 32.1944 Longitude -103.7163  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	Windward Federal 003H	Site Type	Flowline
Date Release Discovered	October 24, 2023	API# (if applicable)	

Unit Letter	Section	Township	Range	County
C	30	24S	32E	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)	0.1336	Volume Recovered (bbls)	0
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls)	0.3118	Volume Recovered (bbls)	0
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input checked="" 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

The release was caused by a hole in the flowline due to corrosion.  
This release was off pad.  
Evaluation will be made of the site to determine if we may commence remediation immediately or delineate any possible impact from the release and we will present a remediation work plan to the NMOCD for approval prior to any significant remediation activities.



Incident ID	NAPP2331054136
District RP	
Facility ID	fAPP2132638253
Application ID	

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

### Initial Response

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

<input 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 <u>not</u> been undertaken, explain why:          	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
Printed Name <b>Brittany N. Esparza</b>	Title: <b>Environmental Technician</b>
Signature: 	Date: <b>11/6/2023</b>
email: <b>Brittany.Esparza@ConocoPhillips.com</b>	Telephone: <b>(432) 221-0398</b>
<b><u>OCD Only</u></b>	
Received by: <b>Shelly Wells</b>	Date: <b>11/6/2023</b>

Spill Calculation - On-Pad Surface Pool Spill										
Received by OCD: 3/7/2024 3:57:48 AM										Page 20 of 78
Convert Irregular shape into a series of rectangles	Length (ft.)	Width (ft.)	Average Depth (in.)	Estimated Pool Area (sq. ft.)	Estimated volume of each pool area (bbl.)	Penetration allowance (ft.)	Total Estimated Volume of Spill (bbl.)	Percentage of Oil if Spilled Fluid is a Mixture (%)	Total Estimated Volume of Spilled Oil (bbl.)	Total Estimated Volume of Spilled Liquid other than Oil (bbl.)
Rectangle A	12	6	0.3	72.00	0.27	0.00	0.27	30%	0.08	0.19
Rectangle B	4	6	0.3	24.00	0.09	0.00	0.09		0.03	0.06
Rectangle C	4	6	0.3	24.00	0.09	0.00	0.09		0.03	0.06
Rectangle D				0.00	0.00	0.00	0.00		0.00	0.00
Rectangle E				0.00	0.00	0.00	0.00		0.00	0.00
Rectangle F				0.00	0.00	0.00	0.00		0.00	0.00
Rectangle G				0.00	0.00	0.00	0.00		0.00	0.00
Rectangle H				0.00	0.00	0.00	0.00		0.00	0.00
Rectangle I				0.00	0.00	0.00	0.00		0.00	0.00
Rectangle J				0.00	0.00	0.00	0.00		0.00	0.00
Released to Imaging: 3/7/2024 3:10:06 PM							Total Surface Pool Volume Released, Release to Soil/Caliche:		0.4455	
									0.1336	0.3118

**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 283175

CONDITIONS

Operator: COG PRODUCTION, LLC 600 W. Illinois Ave Midland, TX 79701	OGRID: 217955
	Action Number: 283175
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
scwells	None	11/6/2023

Incident ID	
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

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

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

<p><b>Characterization Report Checklist:</b> <i>Each of the following items must be included in the report.</i></p> <div><input type="checkbox"/> Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.<input type="checkbox"/> Field data<input type="checkbox"/> Data table of soil contaminant concentration data<input type="checkbox"/> Depth to water determination<input type="checkbox"/> Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release<input type="checkbox"/> Boring or excavation logs<input type="checkbox"/> Photographs including date and GIS information<input type="checkbox"/> Topographic/Aerial maps<input type="checkbox"/> Laboratory data including chain of custody</div>
---

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

Page 4

Incident ID	
District RP	
Facility ID	
Application ID	

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

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

Signature: Jacob Laird Date: \_\_\_\_\_

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

**OCD Only**

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

Incident ID	
District RP	
Facility ID	
Application ID	

## Remediation Plan

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

- ☐ Detailed description of proposed remediation technique
- ☐ Scaled sitemap with GPS coordinates showing delineation points
- ☐ Estimated volume of material to be remediated
- ☐ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☐ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

**Deferral Requests Only:** *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- ☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- ☐ Extents of contamination must be fully delineated.
- ☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

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

Signature: Jacob Laird Date: \_\_\_\_\_

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

**OCD Only**

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

☐ Approved ☒ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral ApprovedSignature: Scott Rodgers Date: 03/07/2024

## **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="#">C 04665</a>	CUB	LE		1	1	2	30	24S	32E	621350	3562798	388	120		
<a href="#">C 04654 POD1</a>	CUB	ED		3	3	4	25	24S	31E	619764	3561226	1911	55		
<a href="#">C 04636 POD1</a>	CUB	ED		3	4	3	25	24S	31E	619200	3561279	2276			
<a href="#">C 04643 POD1</a>	C	ED		4	2	2	05	23S	27E	619200	3561279	2276	305	135	170

Average Depth to Water: **135 feet**

Minimum Depth: **135 feet**

Maximum Depth: **135 feet**

Record Count: 4

UTMNAD83 Radius Search (in meters):

**Easting (X):** 620972.37

**Northing (Y):** 3562708.51

**Radius:** 2600

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.

11/7/23 9:27 AM

Page 1 of 1

WATER COLUMN/ AVERAGE  
DEPTH TO WATER

# National Flood Hazard Layer FIRMette



103°43'18"W 32°11'55"N



0 250 500 1,000 1,500 2,000 Feet

1:6,000

103°42'41"W 32°11'25"N

Released to Imaging: 3/7/2024 3:10:06 PM

Basemap Imagery Source: USGS National Map 2023

## Legend

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

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
		Area of Undetermined Flood Hazard Zone D
GENERAL STRUCTURES		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
		17.5 Cross Sections with 1% Annual Chance Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
MAP PANELS		Coastal Transect Baseline
		Profile Baseline
		Hydrographic Feature
MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped



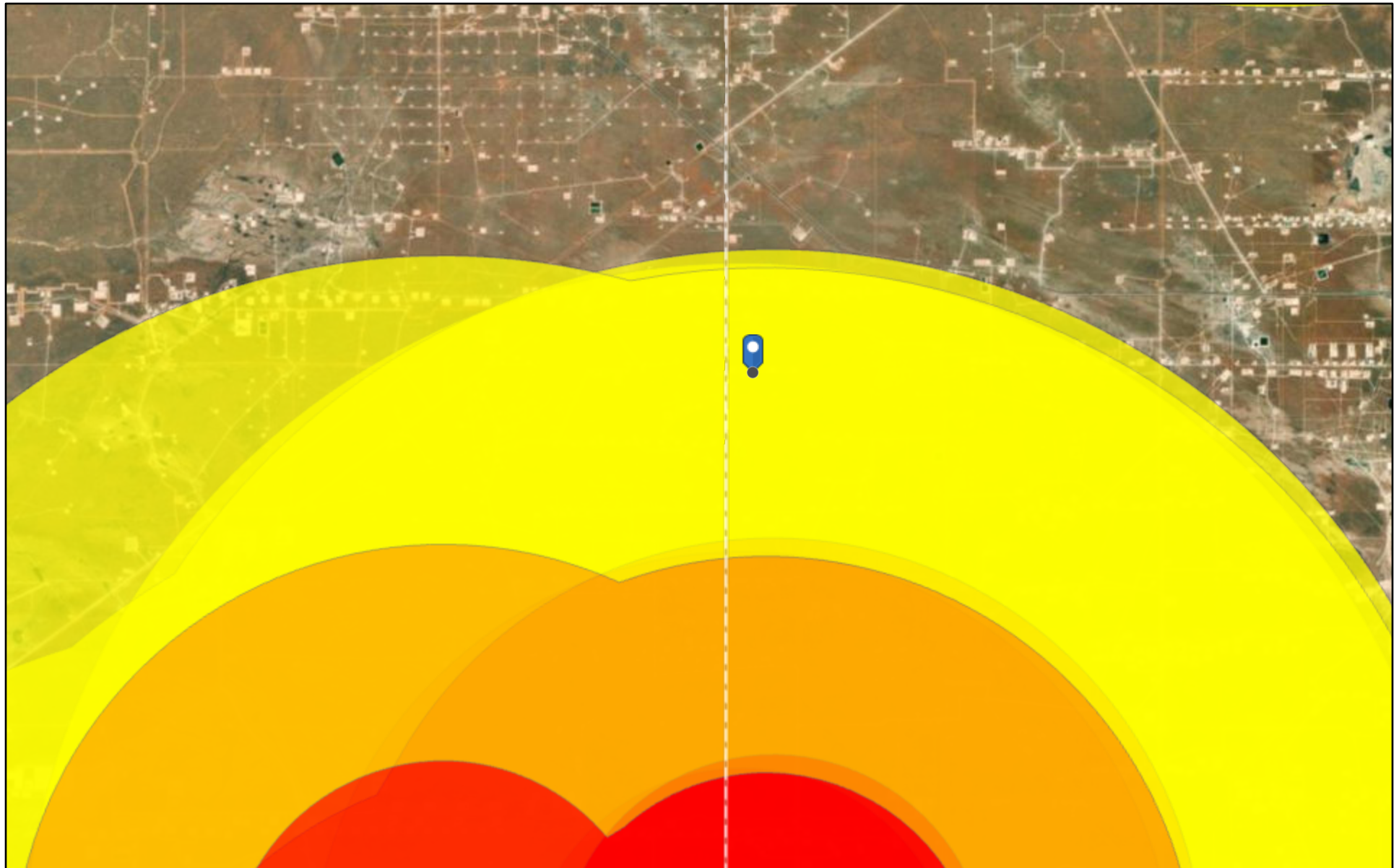
The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

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 **11/7/2023 at 10:40 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 Induced Seismicity Area



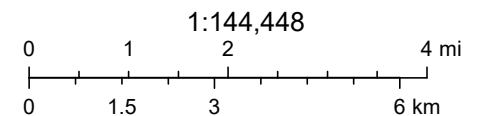
2/20/2024, 2:56:18 PM

Seismic Response 3.5 and above    Seismic Response 2.5 to 2.9    Seismic Response 3.0 to 3.4

3 mi.  
6 mi.  
10 mi.

3 mi.  
6 mi.  
10 mi.

3 mi.  
6 mi.  
10 mi.



Oil Conservation Division (OCD), Energy, Minerals and Natural Resources Department (EMNRD), Esri, HERE, Garmin, Earthstar Geographics

New Mexico Oil Conservation Division

NM OCD Oil and Gas Map. <http://nm-emnrd.maps.arcgis.com/apps/webappviewer/index.html?id=4d017f2306164de29fd2fb9f8f35ca75>: New Mexico Oil Conservation Division



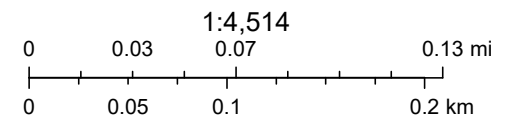
## OCD Karst Areas



11/7/2023, 10:07:36 AM

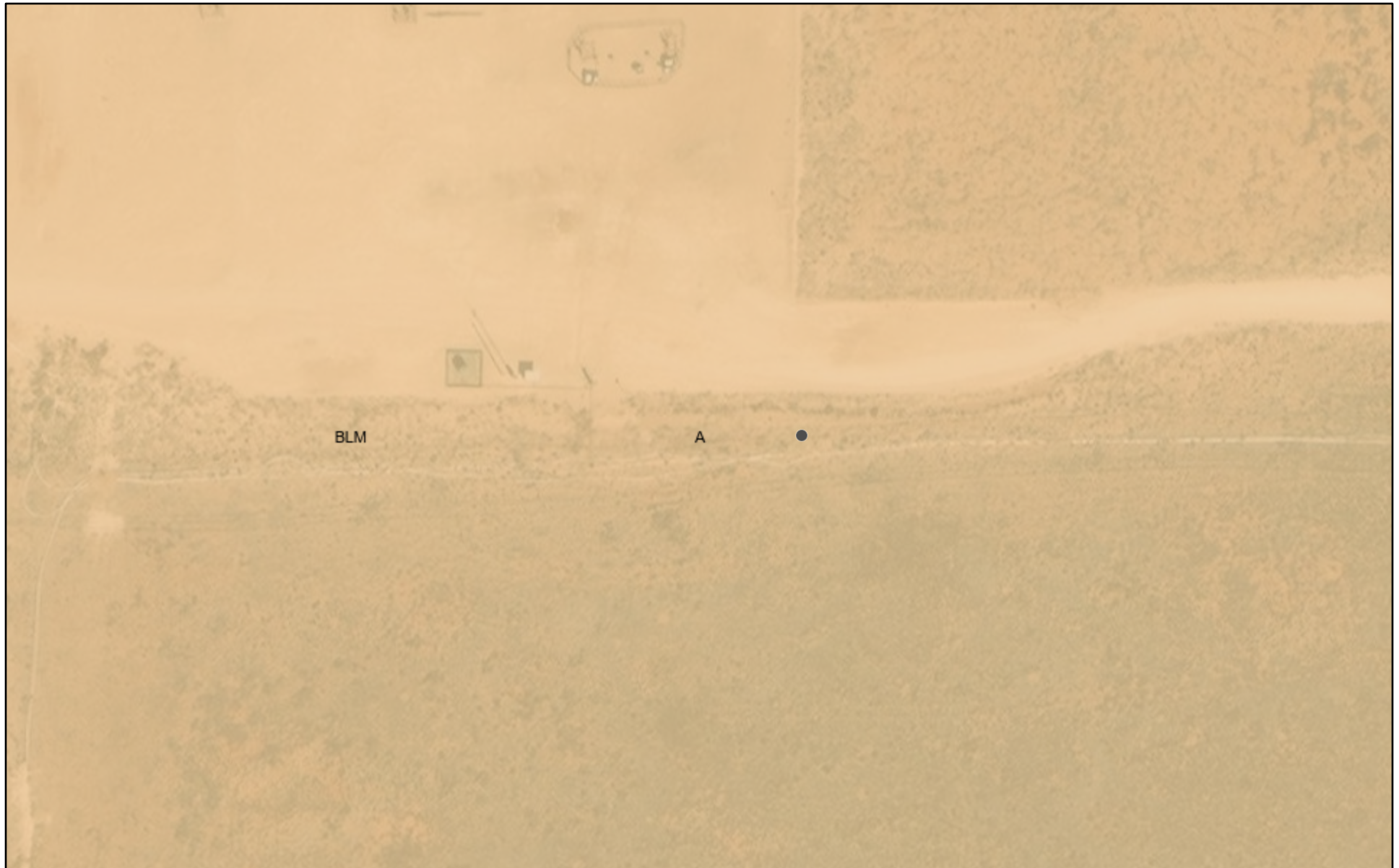
Karst Occurrence Potential

 Low



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

# OCD Land Ownership



11/7/2023, 9:47:02 AM

Mineral Ownership

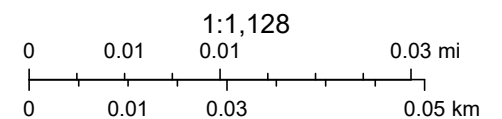
Land Ownership



A-All minerals are owned by U.S.



BLM



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

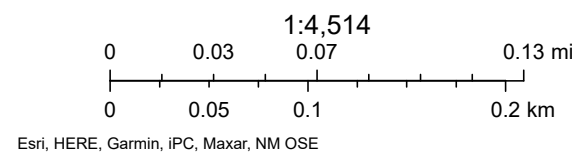
New Mexico Oil Conservation Division



# OCD Waterbodies



11/7/2023, 9:52:51 AM












## National Wetlands Inventory






February 20, 2024

**Wetlands**

-  Estuarine and Marine Deepwater
-  Estuarine and Marine Wetland

-  Freshwater Emergent Wetland
-  Freshwater Forested/Shrub Wetland
-  Freshwater Pond

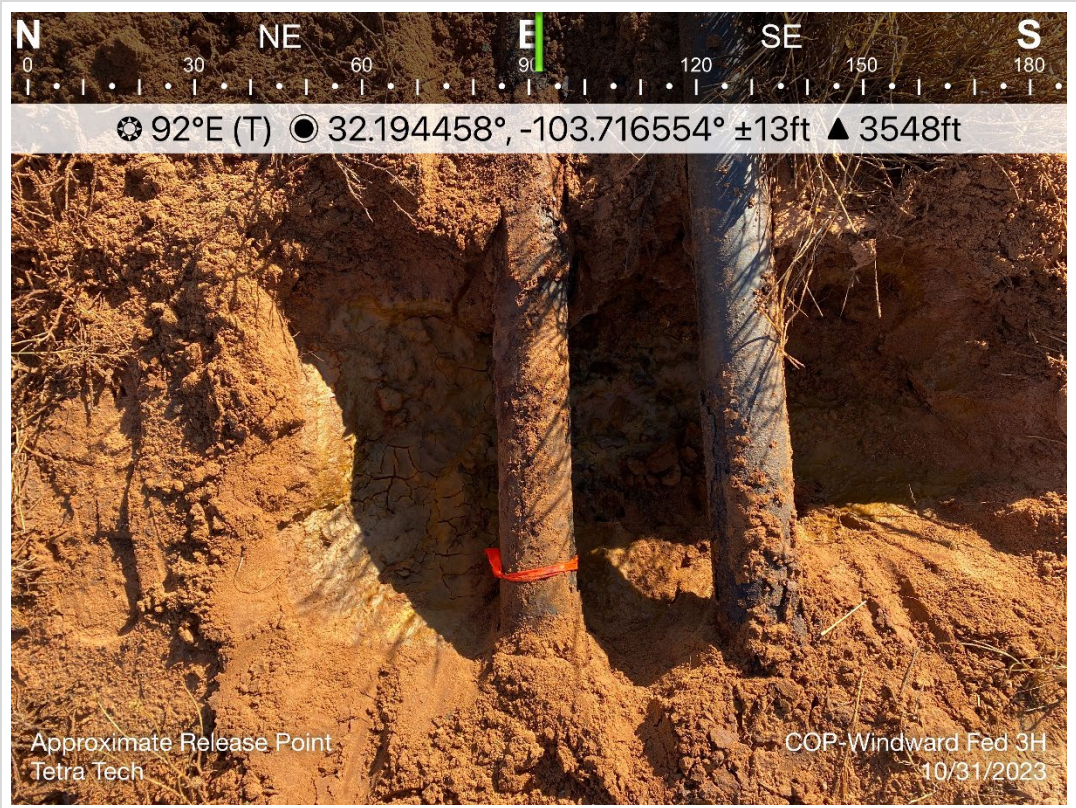
-  Lake
-  Other
-  Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.



## **APPENDIX C**

# **Photographic Documentation**

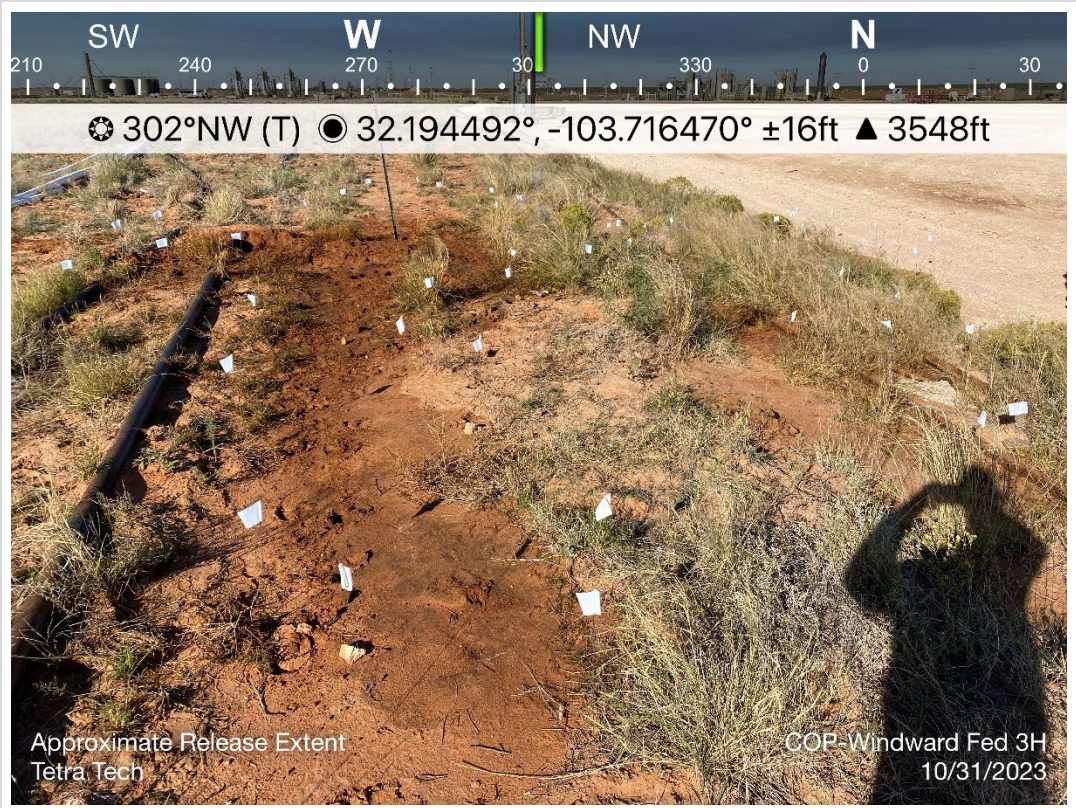


TETRA TECH, INC. PROJECT NO. 212C-MD-03280	DESCRIPTION	View east of approximate release point.	1
	SITE NAME	WINDWARD FEDERAL 3H RELEASE	10/31/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03280	DESCRIPTION	View west. View of approximate release extent and surrounding vegetation.	2
	SITE NAME	WINDWARD FEDERAL 3H RELEASE	10/31/2023





TETRA TECH, INC. PROJECT NO. 212C-MD-03280	DESCRIPTION	View west-northwest of approximate release extent and surrounding vegetation.	3
	SITE NAME	WINDWARD FEDERAL 3H RELEASE	10/31/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03280	DESCRIPTION	View northeast of approximate release extent and surrounding vegetation.	4
	SITE NAME	WINDWARD FEDERAL 3H RELEASE	10/31/2023





TETRA TECH, INC. PROJECT NO. 212C-MD-03280	DESCRIPTION	View south-southwest of approximate release extent and surrounding vegetation.	5
	SITE NAME	WINDWARD FEDERAL 3H RELEASE	10/31/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03280	DESCRIPTION	View east of approximate release extent and assessment activities.	6
	SITE NAME	WINDWARD FEDERAL 3H RELEASE	12/06/2023





TETRA TECH, INC. PROJECT NO. 212C-MD-03280	DESCRIPTION	View south of approximate release extent in vicinity of AH-1 sample location. View of assessment activities.	7
	SITE NAME	WINDWARD FEDERAL 3H RELEASE	12/06/2023



TETRA TECH, INC. PROJECT NO. 212C-MD-03280	DESCRIPTION	View west-southwest of approximate release extent in vicinity of AH-7 sample location. View of assessment activities.	8
	SITE NAME	WINDWARD FEDERAL 3H RELEASE	12/06/2023



## **APPENDIX D**

### **Laboratory Analytical Data**



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

December 12, 2023

SAM ABBOTT

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: WINDWARD FEDERAL 3H RELEASE

Enclosed are the results of analyses for samples received by the laboratory on 12/07/23 13:39.

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/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". The signature is written in a cursive, flowing style.

Celey D. Keene

Lab Director/Quality Manager



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

**Analytical Results For:**

TETRA TECH  
 SAM ABBOTT  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	12/07/2023	Sampling Date:	12/06/2023
Reported:	12/12/2023	Sampling Type:	Soil
Project Name:	WINDWARD FEDERAL 3H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03280	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

**Sample ID: AH - 1 ( 0-1' ) (H236578-01)**

BTEx 8021B		mg/kg		Analyzed By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Benzene*</b>	<b>12.4</b>	1.00	12/11/2023	ND	2.21	111	2.00	0.401	
<b>Toluene*</b>	<b>49.9</b>	1.00	12/11/2023	ND	2.19	109	2.00	0.617	
<b>Ethylbenzene*</b>	<b>9.36</b>	1.00	12/11/2023	ND	2.16	108	2.00	0.340	
<b>Total Xylenes*</b>	<b>70.4</b>	3.00	12/11/2023	ND	6.86	114	6.00	0.345	
<b>Total BTEX</b>	<b>142</b>	6.00	12/11/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 131 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>944</b>	16.0	12/08/2023	ND	400	100	400	7.69	

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>3720</b>	50.0	12/11/2023	ND	182	91.2	200	0.765		
<b>DRO &gt;C10-C28*</b>	<b>20000</b>	50.0	12/11/2023	ND	183	91.5	200	2.20		
<b>EXT DRO &gt;C28-C36</b>	<b>3450</b>	50.0	12/11/2023	ND						

Surrogate: 1-Chlorooctane 213 % 48.2-134

Surrogate: 1-Chlorooctadecane 445 % 49.1-148

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 whatsoever 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 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, Lab Director/Quality Manager





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

**Analytical Results For:**

TETRA TECH  
 SAM ABBOTT  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	12/07/2023	Sampling Date:	12/06/2023
Reported:	12/12/2023	Sampling Type:	Soil
Project Name:	WINDWARD FEDERAL 3H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03280	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

**Sample ID: AH - 1 ( 2'-3' ) (H236578-02)**

BTEx 8021B		mg/kg		Analyzed By: JH/				S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Benzene*</b>	<b>43.2</b>	1.00	12/11/2023	ND	2.21	111	2.00	0.401	
<b>Toluene*</b>	<b>138</b>	1.00	12/11/2023	ND	2.19	109	2.00	0.617	
<b>Ethylbenzene*</b>	<b>31.4</b>	1.00	12/11/2023	ND	2.16	108	2.00	0.340	
<b>Total Xylenes*</b>	<b>178</b>	3.00	12/11/2023	ND	6.86	114	6.00	0.345	
<b>Total BTEX</b>	<b>390</b>	6.00	12/11/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 153 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>992</b>	16.0	12/08/2023	ND	400	100	400	7.69	

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>7440</b>	50.0	12/11/2023	ND	182	91.2	200	0.765	
<b>DRO &gt;C10-C28*</b>	<b>13100</b>	50.0	12/11/2023	ND	183	91.5	200	2.20	
<b>EXT DRO &gt;C28-C36</b>	<b>2210</b>	50.0	12/11/2023	ND					

Surrogate: 1-Chlorooctane 467 % 48.2-134

Surrogate: 1-Chlorooctadecane 261 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

TETRA TECH  
 SAM ABBOTT  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	12/07/2023	Sampling Date:	12/06/2023
Reported:	12/12/2023	Sampling Type:	Soil
Project Name:	WINDWARD FEDERAL 3H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03280	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

**Sample ID: AH - 1 ( 3'-3.5' ) (H236578-03)**

BTEx 8021B		mg/kg		Analyzed By: JH/						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	52.5	2.00	12/11/2023	ND	2.21	111	2.00	0.401		
Toluene*	135	2.00	12/11/2023	ND	2.19	109	2.00	0.617		
Ethylbenzene*	29.3	2.00	12/11/2023	ND	2.16	108	2.00	0.340		
Total Xylenes*	128	6.00	12/11/2023	ND	6.86	114	6.00	0.345		
Total BTEX	344	12.0	12/11/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 121 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>Chloride</b>	<b>640</b>	16.0	12/08/2023	ND	400	100	400	7.69		

TPH 8015M		mg/kg		Analyzed By: MS				S-06	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	6810	50.0	12/11/2023	ND	182	91.2	200	0.765	
DRO >C10-C28*	12200	50.0	12/11/2023	ND	183	91.5	200	2.20	
EXT DRO >C28-C36	1900	50.0	12/11/2023	ND					

Surrogate: 1-Chlorooctane 206 % 48.2-134

Surrogate: 1-Chlorooctadecane 236 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

TETRA TECH  
 SAM ABBOTT  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	12/07/2023	Sampling Date:	12/06/2023
Reported:	12/12/2023	Sampling Type:	Soil
Project Name:	WINDWARD FEDERAL 3H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03280	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

**Sample ID: AH - 2 ( 0-1' ) (H236578-04)**

BTEx 8021B		mg/kg		Analyzed By: JH/				S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Benzene*</b>	<b>8.35</b>	0.500	12/11/2023	ND	2.21	111	2.00	0.401	
<b>Toluene*</b>	<b>57.6</b>	0.500	12/11/2023	ND	2.19	109	2.00	0.617	
<b>Ethylbenzene*</b>	<b>20.6</b>	0.500	12/11/2023	ND	2.16	108	2.00	0.340	
<b>Total Xylenes*</b>	<b>128</b>	1.50	12/11/2023	ND	6.86	114	6.00	0.345	
<b>Total BTEX</b>	<b>215</b>	3.00	12/11/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 190 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>64.0</b>	16.0	12/08/2023	ND	400	100	400	7.69	

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>4540</b>	50.0	12/11/2023	ND	182	91.2	200	0.765	
<b>DRO &gt;C10-C28*</b>	<b>17700</b>	50.0	12/11/2023	ND	183	91.5	200	2.20	
<b>EXT DRO &gt;C28-C36</b>	<b>2680</b>	50.0	12/11/2023	ND					

Surrogate: 1-Chlorooctane 227 % 48.2-134

Surrogate: 1-Chlorooctadecane 351 % 49.1-148

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**Analytical Results For:**

TETRA TECH  
 SAM ABBOTT  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	12/07/2023	Sampling Date:	12/06/2023
Reported:	12/12/2023	Sampling Type:	Soil
Project Name:	WINDWARD FEDERAL 3H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03280	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

**Sample ID: AH - 2 ( 1'-2' ) (H236578-05)**

BTEx 8021B		mg/kg		Analyzed By: JH/				S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Benzene*</b>	<b>54.3</b>	2.00	12/11/2023	ND	2.21	111	2.00	0.401	
<b>Toluene*</b>	<b>206</b>	2.00	12/11/2023	ND	2.19	109	2.00	0.617	
<b>Ethylbenzene*</b>	<b>46.1</b>	2.00	12/11/2023	ND	2.16	108	2.00	0.340	
<b>Total Xylenes*</b>	<b>279</b>	6.00	12/11/2023	ND	6.86	114	6.00	0.345	
<b>Total BTEX</b>	<b>585</b>	12.0	12/11/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 139 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>32.0</b>	16.0	12/08/2023	ND	400	100	400	7.69	

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>10900</b>	50.0	12/11/2023	ND	182	91.2	200	0.765	
<b>DRO &gt;C10-C28*</b>	<b>15400</b>	50.0	12/11/2023	ND	183	91.5	200	2.20	
<b>EXT DRO &gt;C28-C36</b>	<b>2400</b>	50.0	12/11/2023	ND					

Surrogate: 1-Chlorooctane 281 % 48.2-134

Surrogate: 1-Chlorooctadecane 293 % 49.1-148

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**Analytical Results For:**

TETRA TECH  
 SAM ABBOTT  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	12/07/2023	Sampling Date:	12/06/2023
Reported:	12/12/2023	Sampling Type:	Soil
Project Name:	WINDWARD FEDERAL 3H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03280	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

**Sample ID: AH - 3 ( 0-1' ) (H236578-06)**

BTEx 8021B		mg/kg		Analyzed By: JH/				S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Benzene*</b>	<b>7.87</b>	2.00	12/11/2023	ND	2.21	111	2.00	0.401	
<b>Toluene*</b>	<b>151</b>	2.00	12/11/2023	ND	2.19	109	2.00	0.617	
<b>Ethylbenzene*</b>	<b>49.3</b>	2.00	12/11/2023	ND	2.16	108	2.00	0.340	
<b>Total Xylenes*</b>	<b>351</b>	6.00	12/11/2023	ND	6.86	114	6.00	0.345	
<b>Total BTEX</b>	<b>560</b>	12.0	12/11/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 163 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>32.0</b>	16.0	12/08/2023	ND	400	100	400	7.69	

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>5970</b>	50.0	12/11/2023	ND	182	91.2	200	0.765	
<b>DRO &gt;C10-C28*</b>	<b>19100</b>	50.0	12/11/2023	ND	183	91.5	200	2.20	
<b>EXT DRO &gt;C28-C36</b>	<b>3000</b>	50.0	12/11/2023	ND					

Surrogate: 1-Chlorooctane 382 % 48.2-134

Surrogate: 1-Chlorooctadecane 386 % 49.1-148

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**Analytical Results For:**

TETRA TECH  
 SAM ABBOTT  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	12/07/2023	Sampling Date:	12/06/2023
Reported:	12/12/2023	Sampling Type:	Soil
Project Name:	WINDWARD FEDERAL 3H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03280	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

**Sample ID: AH - 3 ( 1'-2' ) (H236578-07)**

BTEx 8021B		mg/kg	Analyzed By: JH/					S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	12/11/2023	ND	2.21	111	2.00	0.401	
Toluene*	1.10	0.050	12/11/2023	ND	2.19	109	2.00	0.617	
Ethylbenzene*	0.731	0.050	12/11/2023	ND	2.16	108	2.00	0.340	
Total Xylenes*	6.50	0.150	12/11/2023	ND	6.86	114	6.00	0.345	
Total BTEX	8.33	0.300	12/11/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 192 % 71.5-134

Chloride, SM4500Cl-B		mg/kg	Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	12/08/2023	ND	400	100	400	7.69	

TPH 8015M		mg/kg	Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	163	10.0	12/08/2023	ND	182	91.2	200	0.765	
DRO >C10-C28*	1310	10.0	12/08/2023	ND	183	91.5	200	2.20	
EXT DRO >C28-C36	221	10.0	12/08/2023	ND					

Surrogate: 1-Chlorooctane 117 % 48.2-134

Surrogate: 1-Chlorooctadecane 112 % 49.1-148

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**Analytical Results For:**

TETRA TECH  
 SAM ABBOTT  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	12/07/2023	Sampling Date:	12/06/2023
Reported:	12/12/2023	Sampling Type:	Soil
Project Name:	WINDWARD FEDERAL 3H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03280	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

**Sample ID: AH - 3 ( 2' - 2.5' ) (H236578-08)**

BTEx 8021B		mg/kg		Analyzed By: JH/				S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	12/11/2023	ND	2.21	111	2.00	0.401	
Toluene*	<b>0.324</b>	0.050	12/11/2023	ND	2.19	109	2.00	0.617	
Ethylbenzene*	<b>0.257</b>	0.050	12/11/2023	ND	2.16	108	2.00	0.340	
Total Xylenes*	<b>2.38</b>	0.150	12/11/2023	ND	6.86	114	6.00	0.345	
Total BTEX	<b>2.96</b>	0.300	12/11/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 142 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<b>32.0</b>	16.0	12/08/2023	ND	400	100	400	7.69	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<b>68.3</b>	10.0	12/08/2023	ND	182	91.2	200	0.765	
DRO >C10-C28*	<b>1010</b>	10.0	12/08/2023	ND	183	91.5	200	2.20	
EXT DRO >C28-C36	<b>183</b>	10.0	12/08/2023	ND					

Surrogate: 1-Chlorooctane 130 % 48.2-134

Surrogate: 1-Chlorooctadecane 130 % 49.1-148

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**Analytical Results For:**

TETRA TECH  
 SAM ABBOTT  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	12/07/2023	Sampling Date:	12/06/2023
Reported:	12/12/2023	Sampling Type:	Soil
Project Name:	WINDWARD FEDERAL 3H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03280	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

**Sample ID: AH - 4 ( 0-1' ) (H236578-09)**

BTEx 8021B		mg/kg		Analyzed By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	12/08/2023	ND	2.21	111	2.00	0.401	
Toluene*	<0.050	0.050	12/08/2023	ND	2.19	109	2.00	0.617	
Ethylbenzene*	<0.050	0.050	12/08/2023	ND	2.16	108	2.00	0.340	
Total Xylenes*	<0.150	0.150	12/08/2023	ND	6.86	114	6.00	0.345	
Total BTEX	<0.300	0.300	12/08/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 105 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	12/08/2023	ND	400	100	400	7.69	

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	12/11/2023	ND	182	91.2	200	0.765	
DRO >C10-C28*	<10.0	10.0	12/11/2023	ND	183	91.5	200	2.20	
EXT DRO >C28-C36	<10.0	10.0	12/11/2023	ND					

Surrogate: 1-Chlorooctane 77.8 % 48.2-134

Surrogate: 1-Chlorooctadecane 72.3 % 49.1-148

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**Analytical Results For:**

TETRA TECH  
 SAM ABBOTT  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	12/07/2023	Sampling Date:	12/06/2023
Reported:	12/12/2023	Sampling Type:	Soil
Project Name:	WINDWARD FEDERAL 3H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03280	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

**Sample ID: AH - 5 ( 0-1' ) (H236578-10)**

BTEx 8021B		mg/kg		Analyzed By: JH/						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	12/08/2023	ND	2.21	111	2.00	0.401		
Toluene*	<0.050	0.050	12/08/2023	ND	2.19	109	2.00	0.617		
Ethylbenzene*	<0.050	0.050	12/08/2023	ND	2.16	108	2.00	0.340		
Total Xylenes*	<0.150	0.150	12/08/2023	ND	6.86	114	6.00	0.345		
Total BTEx	<0.300	0.300	12/08/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 105 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	12/08/2023	ND	400	100	400	7.69		

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	12/08/2023	ND	182	91.2	200	0.765	
DRO >C10-C28*	<10.0	10.0	12/08/2023	ND	183	91.5	200	2.20	
EXT DRO >C28-C36	<10.0	10.0	12/08/2023	ND					

Surrogate: 1-Chlorooctane 93.0 % 48.2-134

Surrogate: 1-Chlorooctadecane 89.4 % 49.1-148

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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:**

TETRA TECH  
 SAM ABBOTT  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	12/07/2023	Sampling Date:	12/06/2023
Reported:	12/12/2023	Sampling Type:	Soil
Project Name:	WINDWARD FEDERAL 3H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03280	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

**Sample ID: AH - 6 ( 0-1' ) (H236578-11)**

BTEx 8021B		mg/kg		Analyzed By: JH/						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	12/08/2023	ND	2.21	111	2.00	0.401		
Toluene*	<0.050	0.050	12/08/2023	ND	2.19	109	2.00	0.617		
Ethylbenzene*	<0.050	0.050	12/08/2023	ND	2.16	108	2.00	0.340		
Total Xylenes*	<0.150	0.150	12/08/2023	ND	6.86	114	6.00	0.345		
Total BTEX	<0.300	0.300	12/08/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 105 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	64.0	16.0	12/08/2023	ND	400	100	400	7.69		

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	12/08/2023	ND	182	91.2	200	0.765	
DRO >C10-C28*	21.0	10.0	12/08/2023	ND	183	91.5	200	2.20	
EXT DRO >C28-C36	<10.0	10.0	12/08/2023	ND					

Surrogate: 1-Chlorooctane 120 % 48.2-134

Surrogate: 1-Chlorooctadecane 116 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

TETRA TECH  
 SAM ABBOTT  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	12/07/2023	Sampling Date:	12/06/2023
Reported:	12/12/2023	Sampling Type:	Soil
Project Name:	WINDWARD FEDERAL 3H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03280	Sample Received By:	Tamara Oldaker
Project Location:	COP - LEA CO NM		

**Sample ID: AH - 7 ( 0-1' ) (H236578-12)**

BTEx 8021B		mg/kg		Analyzed By: JH/						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	12/08/2023	ND	2.21	111	2.00	0.401		
Toluene*	<0.050	0.050	12/08/2023	ND	2.19	109	2.00	0.617		
Ethylbenzene*	<0.050	0.050	12/08/2023	ND	2.16	108	2.00	0.340		
Total Xylenes*	<0.150	0.150	12/08/2023	ND	6.86	114	6.00	0.345		
Total BTEX	<0.300	0.300	12/08/2023	ND						

Surrogate: 4-Bromofluorobenzene (PID) 105 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	12/08/2023	ND	400	100	400	7.69		

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	12/08/2023	ND	182	91.2	200	0.765	
DRO >C10-C28*	92.0	10.0	12/08/2023	ND	183	91.5	200	2.20	
EXT DRO >C28-C36	30.7	10.0	12/08/2023	ND					

Surrogate: 1-Chlorooctane 101 % 48.2-134

Surrogate: 1-Chlorooctadecane 95.5 % 49.1-148

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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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.
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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A handwritten signature in black ink, appearing to read "Celey D. Keene".

Celey D. Keene, Lab Director/Quality Manager



ch

† Cardinal cannot accept verbal changes. Please email changes to [celey.keene@cardinallabsnm.com](mailto:celey.keene@cardinallabsnm.com)





ANALYSIS REQUEST

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

January 19, 2024

CHRISTIAN LLULL

TETRA TECH

901 WEST WALL STREET , STE 100

MIDLAND, TX 79701

RE: WINDWARD FED 3H RELEASE

Enclosed are the results of analyses for samples received by the laboratory on 01/16/24 15:08.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-23-16. 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". The signature is fluid and cursive, with the first name "Celey" and last name "Keene" clearly distinguishable.

Celey D. Keene

Lab Director/Quality Manager



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

**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	01/16/2024	Sampling Date:	01/15/2024
Reported:	01/19/2024	Sampling Type:	Soil
Project Name:	WINDWARD FED 3H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03280	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

**Sample ID: T - 1 (0-1') (H240188-01)**

BTX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Benzene*</b>	<b>30.4</b>	2.00	01/17/2024	ND	2.44	122	2.00	3.32	
<b>Toluene*</b>	<b>120</b>	2.00	01/17/2024	ND	2.36	118	2.00	3.30	
<b>Ethylbenzene*</b>	<b>32.8</b>	2.00	01/17/2024	ND	2.43	121	2.00	4.03	
<b>Total Xylenes*</b>	<b>197</b>	6.00	01/17/2024	ND	7.32	122	6.00	3.60	
<b>Total BTX</b>	<b>380</b>	12.0	01/17/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 124 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>480</b>	16.0	01/17/2024	ND	416	104	400	0.00	

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>7850</b>	100	01/17/2024	ND	211	105	200	2.50		
<b>DRO &gt;C10-C28*</b>	<b>12300</b>	100	01/17/2024	ND	201	100	200	2.00		
<b>EXT DRO &gt;C28-C36</b>	<b>1830</b>	100	01/17/2024	ND						

Surrogate: 1-Chlorooctane 183 % 48.2-134

Surrogate: 1-Chlorooctadecane 230 % 49.1-148

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager





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**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	01/16/2024	Sampling Date:	01/15/2024
Reported:	01/19/2024	Sampling Type:	Soil
Project Name:	WINDWARD FED 3H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03280	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

**Sample ID: T - 1 (2-3') (H240188-02)**

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	14.8	2.00	01/17/2024	ND	2.44	122	2.00	3.32	
Toluene*	58.3	2.00	01/17/2024	ND	2.36	118	2.00	3.30	
Ethylbenzene*	16.0	2.00	01/17/2024	ND	2.43	121	2.00	4.03	
Total Xylenes*	90.0	6.00	01/17/2024	ND	7.32	122	6.00	3.60	
Total BTEX	179	12.0	01/17/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 110 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
<b>Chloride</b>	<b>624</b>	16.0	01/17/2024	ND	416	104	400	0.00		

TPH 8015M	mg/kg		Analyzed By: MS					S-04	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	3300	10.0	01/17/2024	ND	211	105	200	2.50	
DRO >C10-C28*	5640	10.0	01/17/2024	ND	201	100	200	2.00	
EXT DRO >C28-C36	943	10.0	01/17/2024	ND					

Surrogate: 1-Chlorooctane 166 % 48.2-134

Surrogate: 1-Chlorooctadecane 105 % 49.1-148

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	01/16/2024	Sampling Date:	01/15/2024
Reported:	01/19/2024	Sampling Type:	Soil
Project Name:	WINDWARD FED 3H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03280	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

**Sample ID: T - 1 (3-4') (H240188-03)**

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	44.9	2.00	01/17/2024	ND	2.14	107	2.00	3.11	
Toluene*	132	2.00	01/17/2024	ND	2.14	107	2.00	3.06	
Ethylbenzene*	30.7	2.00	01/17/2024	ND	2.15	107	2.00	2.90	
Total Xylenes*	141	6.00	01/17/2024	ND	6.36	106	6.00	2.80	
Total BTEX	348	12.0	01/17/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 111 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	304	16.0	01/17/2024	ND	416	104	400	0.00		

TPH 8015M	mg/kg		Analyzed By: MS					S-06	
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	7420	50.0	01/18/2024	ND	211	105	200	2.50	
DRO >C10-C28*	12800	50.0	01/18/2024	ND	201	100	200	2.00	
EXT DRO >C28-C36	2090	50.0	01/18/2024	ND					

Surrogate: 1-Chlorooctane 279 % 48.2-134

Surrogate: 1-Chlorooctadecane 244 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	01/16/2024	Sampling Date:	01/15/2024
Reported:	01/19/2024	Sampling Type:	Soil
Project Name:	WINDWARD FED 3H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03280	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

**Sample ID: T - 1 (5-6') (H240188-04)**

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Benzene*</b>	<b>10.6</b>	2.00	01/17/2024	ND	2.14	107	2.00	3.11	
<b>Toluene*</b>	<b>64.2</b>	2.00	01/17/2024	ND	2.14	107	2.00	3.06	
<b>Ethylbenzene*</b>	<b>17.0</b>	2.00	01/17/2024	ND	2.15	107	2.00	2.90	
<b>Total Xylenes*</b>	<b>95.0</b>	6.00	01/17/2024	ND	6.36	106	6.00	2.80	
<b>Total BTEX</b>	<b>187</b>	12.0	01/17/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 129 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>240</b>	16.0	01/17/2024	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
<b>GRO C6-C10*</b>	<b>1750</b>	10.0	01/17/2024	ND	211	105	200	2.50	
<b>DRO &gt;C10-C28*</b>	<b>3280</b>	10.0	01/17/2024	ND	201	100	200	2.00	
<b>EXT DRO &gt;C28-C36</b>	<b>556</b>	10.0	01/17/2024	ND					

Surrogate: 1-Chlorooctane 130 % 48.2-134

Surrogate: 1-Chlorooctadecane 92.8 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	01/16/2024	Sampling Date:	01/15/2024
Reported:	01/19/2024	Sampling Type:	Soil
Project Name:	WINDWARD FED 3H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03280	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

**Sample ID: T - 1 (7-8') (H240188-05)**

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Benzene*</b>	<b>0.249</b>	0.050	01/17/2024	ND	2.14	107	2.00	3.11	
<b>Toluene*</b>	<b>3.30</b>	0.050	01/17/2024	ND	2.14	107	2.00	3.06	
<b>Ethylbenzene*</b>	<b>1.58</b>	0.050	01/17/2024	ND	2.15	107	2.00	2.90	
<b>Total Xylenes*</b>	<b>8.10</b>	0.150	01/17/2024	ND	6.36	106	6.00	2.80	
<b>Total BTEX</b>	<b>13.2</b>	0.300	01/17/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 125 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>112</b>	16.0	01/17/2024	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
<b>GRO C6-C10*</b>	<b>209</b>	10.0	01/17/2024	ND	211	105	200	2.50	
<b>DRO &gt;C10-C28*</b>	<b>994</b>	10.0	01/17/2024	ND	201	100	200	2.00	
<b>EXT DRO &gt;C28-C36</b>	<b>192</b>	10.0	01/17/2024	ND					

Surrogate: 1-Chlorooctane 94.6 % 48.2-134

Surrogate: 1-Chlorooctadecane 86.7 % 49.1-148

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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:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	01/16/2024	Sampling Date:	01/15/2024
Reported:	01/19/2024	Sampling Type:	Soil
Project Name:	WINDWARD FED 3H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03280	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

**Sample ID: T - 2 (0-1') (H240188-06)**

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	01/17/2024	ND	2.14	107	2.00	3.11	
Toluene*	<0.050	0.050	01/17/2024	ND	2.14	107	2.00	3.06	
Ethylbenzene*	<0.050	0.050	01/17/2024	ND	2.15	107	2.00	2.90	
Total Xylenes*	<0.150	0.150	01/17/2024	ND	6.36	106	6.00	2.80	
Total BTEX	<0.300	0.300	01/17/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 119 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	01/17/2024	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	01/17/2024	ND	211	105	200	2.50	
DRO >C10-C28*	<10.0	10.0	01/17/2024	ND	201	100	200	2.00	
EXT DRO >C28-C36	<10.0	10.0	01/17/2024	ND					

Surrogate: 1-Chlorooctane 91.3 % 48.2-134

Surrogate: 1-Chlorooctadecane 89.3 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	01/16/2024	Sampling Date:	01/15/2024
Reported:	01/19/2024	Sampling Type:	Soil
Project Name:	WINDWARD FED 3H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03280	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

**Sample ID: T - 2 (2-3') (H240188-07)**

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	01/17/2024	ND	2.14	107	2.00	3.11	
Toluene*	<b>0.084</b>	0.050	01/17/2024	ND	2.14	107	2.00	3.06	
Ethylbenzene*	<b>0.102</b>	0.050	01/17/2024	ND	2.15	107	2.00	2.90	
Total Xylenes*	<b>0.858</b>	0.150	01/17/2024	ND	6.36	106	6.00	2.80	
Total BTEX	<b>1.04</b>	0.300	01/17/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 122 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<b>64.0</b>	16.0	01/17/2024	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*	<b>108</b>	10.0	01/17/2024	ND	211	105	200	2.50	
DRO >C10-C28*	<b>768</b>	10.0	01/17/2024	ND	201	100	200	2.00	
EXT DRO >C28-C36	<b>121</b>	10.0	01/17/2024	ND					

Surrogate: 1-Chlorooctane 96.0 % 48.2-134

Surrogate: 1-Chlorooctadecane 94.0 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	01/16/2024	Sampling Date:	01/15/2024
Reported:	01/19/2024	Sampling Type:	Soil
Project Name:	WINDWARD FED 3H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03280	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

**Sample ID: T - 2 (3-4') (H240188-08)**

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	01/17/2024	ND	2.14	107	2.00	3.11		
Toluene*	<0.050	0.050	01/17/2024	ND	2.14	107	2.00	3.06		
Ethylbenzene*	<0.050	0.050	01/17/2024	ND	2.15	107	2.00	2.90		
Total Xylenes*	<0.150	0.150	01/17/2024	ND	6.36	106	6.00	2.80		
Total BTEX	<0.300	0.300	01/17/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 118 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	64.0	16.0	01/17/2024	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	01/17/2024	ND	211	105	200	2.50		
DRO >C10-C28*	<10.0	10.0	01/17/2024	ND	201	100	200	2.00		
EXT DRO >C28-C36	<10.0	10.0	01/17/2024	ND						

Surrogate: 1-Chlorooctane 88.2 % 48.2-134

Surrogate: 1-Chlorooctadecane 84.8 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	01/16/2024	Sampling Date:	01/15/2024
Reported:	01/19/2024	Sampling Type:	Soil
Project Name:	WINDWARD FED 3H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03280	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

**Sample ID: T - 2 (5-6') (H240188-09)**

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	01/17/2024	ND	2.14	107	2.00	3.11		
Toluene*	<0.050	0.050	01/17/2024	ND	2.14	107	2.00	3.06		
Ethylbenzene*	<0.050	0.050	01/17/2024	ND	2.15	107	2.00	2.90		
Total Xylenes*	<0.150	0.150	01/17/2024	ND	6.36	106	6.00	2.80		
Total BTEX	<0.300	0.300	01/17/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 117 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	01/17/2024	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	01/17/2024	ND	211	105	200	2.50		
DRO >C10-C28*	30.3	10.0	01/17/2024	ND	201	100	200	2.00		
EXT DRO >C28-C36	<10.0	10.0	01/17/2024	ND						

Surrogate: 1-Chlorooctane 88.3 % 48.2-134

Surrogate: 1-Chlorooctadecane 85.1 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager





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**Analytical Results For:**

TETRA TECH  
 CHRISTIAN LLULL  
 901 WEST WALL STREET , STE 100  
 MIDLAND TX, 79701  
 Fax To: (432) 682-3946

Received:	01/16/2024	Sampling Date:	01/15/2024
Reported:	01/19/2024	Sampling Type:	Soil
Project Name:	WINDWARD FED 3H RELEASE	Sampling Condition:	Cool & Intact
Project Number:	212C - MD - 03280	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

**Sample ID: AH - 8 (0-1') (H240188-10)**

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	01/17/2024	ND	2.14	107	2.00	3.11	
Toluene*	<0.050	0.050	01/17/2024	ND	2.14	107	2.00	3.06	
Ethylbenzene*	<0.050	0.050	01/17/2024	ND	2.15	107	2.00	2.90	
Total Xylenes*	<0.150	0.150	01/17/2024	ND	6.36	106	6.00	2.80	
Total BTEX	<0.300	0.300	01/17/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 117 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	16.0	16.0	01/17/2024	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	01/17/2024	ND	211	105	200	2.50	
DRO >C10-C28*	<10.0	10.0	01/17/2024	ND	201	100	200	2.00	
EXT DRO >C28-C36	<10.0	10.0	01/17/2024	ND					

Surrogate: 1-Chlorooctane 88.3 % 48.2-134

Surrogate: 1-Chlorooctadecane 83.6 % 49.1-148

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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.
- BS-3            Blank spike recovery outside of lab established statistical limits, but still within method limits. Data is not adversely affected.
- 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, 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> Tetra Tech, Inc. on behalf of ConocoPhillips Company <b>Project Manager:</b> Christian Lull <b>Address:</b> 8911 N. Capital of Texas Hwy <b>City:</b> Austin <b>State:</b> Texas <b>Zip:</b> 78759 <b>Phone #:</b> (512) 565-0190 <b>Project #:</b> 212C-MD-03280 <b>Project Name:</b> Windward Fed 3H Release <b>Project Location:</b> Lea County, NM <b>Sample Name:</b> Robert Davis <b>Lab I.D.:</b>				<b>P.O. #:</b> N/A <b>Company:</b> Tetra Tech, Inc. <b>Attn:</b> christian.lull@tetratech.com <b>Add:</b> 8911 N. Capital of Texas Hwy <b>City:</b> Austin <b>State:</b> TX <b>Zip:</b> 78759 <b>Phone #:</b> (512) 565-0190 <b>Fax #:</b> N/A				<b>BILL TO</b>				<b>ANALYSIS REQUEST</b>																																																											
PROJECT NOTE: Liability and Damages: Contractor's liability and client's exclusions remain in contract as such, which is subject to the contract and the client for the assignment. 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 services. No event shall Cardinal be liable for incidental or consequential damages, including without limitation, 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 rendered by Cardinal, regardless of whether such claim is based upon any of the above stated theories or otherwise.																																																																							
<b>Relinquished By:</b> Robert Davis		<b>Date:</b> 1/16/24 <b>Time:</b> 1:50 PM		<b>Received By:</b> William Lull		<b>Date:</b> 1/16/24 <b>Time:</b> 1:50 PM		<b>Verbal Result:</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <b>All Results are emailed. Please provide Email address:</b>		<b>Add'l Phone #:</b>																																																													
<b>Relinquished By:</b> Robert Davis		<b>Date:</b> 1/16/24 <b>Time:</b> 1:50 PM		<b>Received By:</b> William Lull		<b>Date:</b> 1/16/24 <b>Time:</b> 1:50 PM		<b>REMARKS:</b>		<b>REMARKS:</b>																																																													
Delivered By: (Circle One) Sampler - UPS - Bus - Other:												Observed Temp. °C: 5.4 Corrected Temp. °C:												Sample Condition: Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/> No <input type="checkbox"/> No <input type="checkbox"/>												CHECKED BY: (Initials) [Signature]												Turnaround Time: <input checked="" type="checkbox"/> Standard <input type="checkbox"/> Rush Cool Inlet <input type="checkbox"/> Observed Temp. °C:												Thermometer ID: #140 Correction Factor: 0.3°C Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>											

Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX						PRESERV.	SAMPLING	DATE	TIME	BTX 8021B	Chloride SM 4500 Cl-B	TPH 8015M	
			GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER : ACID/BASE:								ICE / COOL
1	T-1 (-0-1)	G	1									1/15/2024	0930	X	X	X
2	T-1 (-2-3)	G	1									1/15/2024	0935	X	X	X
3	T-1 (-3-4)	G	1									1/15/2024	0940	X	X	X
4	T-1 (-5-6)	G	1									1/15/2024	0950	X	X	X
5	T-1 (-7-8)	G	1									1/15/2024	1000	X	X	X
6	T-2 (-0-1)	G	1									1/15/2024	1035	X	X	X
7	T-2 (-2-3)	G	1									1/15/2024	1040	X	X	X
8	T-2 (-3-4)	G	1									1/15/2024	1050	X	X	X
9	T-2 (-5-6)	G	1									1/15/2024	1100	X	X	X
10	AH-8 (-0-1)	G	1									1/15/2024	1130	X	X	X

## **APPENDIX E**

### **Regulatory Correspondence**



**From:** [Velez, Nelson, EMNRD](#)  
**To:** [Chavira, Lisbeth](#)  
**Cc:** [Llull, Christian](#); [Abbott, Sam](#); [Bratcher, Michael, EMNRD](#)  
**Subject:** Re: [EXTERNAL] Extension Request - Windward Fed 3H Release (NAPP2331054136)  
**Date:** Monday, January 22, 2024 2:33:15 PM  
**Attachments:** [image011.png](#)  
[image012.png](#)  
[image013.png](#)  
[image014.png](#)  
[image015.png](#)  
[Outlook-vqgzaksc.png](#)

Some people who received this message don't often get email from nelson.velez@emnrd.nm.gov. [Learn why this is important](#)

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

Good afternoon Lisbeth,

90-day time extension request is approved. Remediation Due date has been updated to April 22, 2024.

Please keep a copy of this communication for inclusion within the appropriate report submittal.

The OCD requires a copy of all correspondence relative to remedial activities be included in all proposals and/or final closure reports. Correspondence required to be included in reports may include, but not limited to, notifications for liner inspections, sample events, spill/release/fire, and request for time extensions or variances.

Regards,

**Nelson Velez** • Environmental Specialist - Adv  
Environmental Bureau | EMNRD - Oil Conservation Division  
1000 Rio Brazos Road | Aztec, NM 87410  
(505) 469-6146 | [nelson.velez@emnrd.nm.gov](mailto:nelson.velez@emnrd.nm.gov)  
<http://www.emnrd.state.nm.us/OCD/>



---

**From:** Wells, Shelly, EMNRD <Shelly.Wells@emnrd.nm.gov>

**Sent:** Friday, January 19, 2024 3:49 PM  
**To:** Velez, Nelson, EMNRD <Nelson.Velez@emnrd.nm.gov>  
**Cc:** Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>  
**Subject:** FW: [EXTERNAL] Extension Request - Windward Fed 3H Release (NAPP2331054136)

---

**From:** Chavira, Lisbeth <LISBETH.CHAVIRA@tetrattech.com>  
**Sent:** Friday, January 19, 2024 3:45 PM  
**To:** Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>  
**Cc:** Llull, Christian <Christian.Llull@tetrattech.com>; Abbott, Sam <Sam.Abbott@tetrattech.com>  
**Subject:** [EXTERNAL] Extension Request - Windward Fed 3H Release (NAPP2331054136)

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

To Whom it May Concern,

On behalf of ConocoPhillips, Tetra Tech is requesting a 90-day extension (until April 22, 2024) to complete reporting for the Windward Fed 3H Release (**NAPP2331054136**).

The initial C-141 for this release was received by NMOCD on November 6, 2023. ConocoPhillips immediately commenced pursuing a 90-day (January 22, 2024) release characterization and closure per 19.15.29.11(A) NMAC. According to the NMOCD C-141 Initial Report, the date of the release was October 24, 2023. The release was caused by a hole in the flowline due to corrosion. Approximately 0.1336 bbls of crude oil and 0.3118 of produced water were reported released, of which 0 bbl was recovered.

Tetra Tech has completed the following assessment activities at the release site:

- On December 6, 2023, Tetra Tech personnel were on site to assess the release.
  - Three (3) hand augers were installed within the release footprint for vertical delineation. However, due to a hard layer of rock being encountered, the hand auger borings were installed to a maximum depth of 3.5 ft bgs.
  - Four (4) hand augers were installed around the perimeter of the release to a depth of 1 ft bgs for horizontal delineation.
  - Vertical and horizontal delineation was not achieved based on analytical results.
- On January 15, 2024, Tetra Tech personnel re-mobilized to the site to complete vertical and horizontal delineation.
  - Two (2) trenches (T-1 and T-2) were installed to a maximum depth of 8 ft bgs to complete vertical delineation.
  - One (1) additional hand auger was installed to the east of the release to 1 ft bgs to complete horizontal delineation.

As of today, the analytical results for the additional assessment completed on January 15, 2024, have not been received. Tetra Tech and ConocoPhillips need additional time to complete evaluation of the additional assessment data, any required remedial actions, and subsequent reporting. A complete report will be submitted to the NMOCD within the requested timeframe.

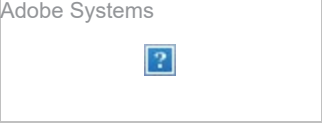
Thank you,

**Lisbeth Chavira** | Geoscientist  
Direct Mobile **+1 (512) 596-8201** | [Lisbeth.chavira@tetrattech.com](mailto:Lisbeth.chavira@tetrattech.com)

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Oil Conservation Division  
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QUESTIONS  
  
Action 321116

QUESTIONS

Operator: COG PRODUCTION, LLC 600 W. Illinois Ave Midland, TX 79701	OGRID: 217955
	Action Number: 321116
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2331054136
Incident Name	NAPP2331054136 WINDWARD FEDERAL 003H @ 0
Incident Type	Release Other
Incident Status	Remediation Plan Received
Incident Facility	[fAPP2132638253] WINDWARD FED 2H - BATTERY

Location of Release Source	
Please answer all the questions in this group.	
Site Name	WINDWARD FEDERAL 003H
Date Release Discovered	10/24/2023
Surface Owner	Federal

Incident Details	
Please answer all the questions in this group.	
Incident Type	Release Other
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

Nature and Volume of Release	
Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.	
Crude Oil Released (bbls) Details	Cause: Corrosion   Flow Line - Production   Crude Oil   Released: 0 BBL   Recovered: 0 BBL   Lost: 0 BBL.
Produced Water Released (bbls) Details	Cause: Corrosion   Flow Line - Production   Produced Water   Released: 0 BBL   Recovered: 0 BBL   Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.



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QUESTIONS, Page 2

Action 321116

QUESTIONS (continued)

Operator: COG PRODUCTION, LLC 600 W. Illinois Ave Midland, TX 79701	OGRID:
	217955
	Action Number:
	321116
Action Type:	
[C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)	

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	More info needed to determine if this will be treated as a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Unavailable.
Reasons why this would be considered a submission for a notification of a major release	Unavailable.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.	

Initial Response

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

The source of the release has been stopped	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	Not answered.

Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.

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.

I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 03/07/2024
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QUESTIONS, Page 3

Action 321116

**QUESTIONS (continued)**

Operator: COG PRODUCTION, LLC 600 W. Illinois Ave Midland, TX 79701	OGRID: 217955
	Action Number: 321116
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

**QUESTIONS****Site Characterization**

Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). 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 in feet below ground surface (ft bgs)	Between 100 and 500 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
<b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>	
A continuously flowing watercourse or any other significant watercourse	Between ½ and 1 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Greater than 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Greater than 5 (mi.)
Any other fresh water well or spring	Greater than 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1 and 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	None
A 100-year floodplain	Greater than 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

**Remediation Plan**

Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

Requesting a remediation plan approval with this submission	Yes
Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No

**Soil Contamination Sampling:** (Provide the highest observable value for each, in milligrams per kilograms.)

Chloride (EPA 300.0 or SM4500 Cl B)	944
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	28700
GRO+DRO (EPA SW-846 Method 8015M)	26300
BTEX (EPA SW-846 Method 8021B or 8260B)	585
Benzene (EPA SW-846 Method 8021B or 8260B)	54.3

Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.

On what estimated date will the remediation commence	06/01/2024
On what date will (or did) the final sampling or liner inspection occur	06/02/2024
On what date will (or was) the remediation complete(d)	06/05/2024
What is the estimated surface area (in square feet) that will be reclaimed	311
What is the estimated volume (in cubic yards) that will be reclaimed	89
What is the estimated surface area (in square feet) that will be remediated	311
What is the estimated volume (in cubic yards) that will be remediated	89

These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.

The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

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QUESTIONS, Page 4

Action 321116

**QUESTIONS (continued)**

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	Action Number:	321116
	Action Type:	[C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

**QUESTIONS****Remediation Plan (continued)**

Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

**This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:**

(Select all answers below that apply.)

(Ex Situ) Excavation and <b>off-site</b> disposal (i.e. dig and haul, hydrovac, etc.)	Yes
Which OCD approved facility will be used for <b>off-site</b> disposal	WINDWARD FEDERAL #002H [fDHR1914358314]
<b>OR</b> which OCD approved well (API) will be used for <b>off-site</b> disposal	Not answered.
<b>OR</b> is the <b>off-site</b> disposal site, to be used, out-of-state	Not answered.
<b>OR</b> is the <b>off-site</b> disposal site, to be used, an NMED facility	Not answered.
(Ex Situ) Excavation and <b>on-site</b> remediation (i.e. On-Site Land Farms)	No
(In Situ) Soil Vapor Extraction	No
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	No
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	No
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	No
Ground Water Abatement pursuant to 19.15.30 NMAC	No
OTHER (Non-listed remedial process)	No

Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.

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.

I hereby agree and sign off to the above statement	Name: Brittany Esparza Title: Environmental Technician Email: brittany.Esparza@ConocoPhillips.com Date: 03/07/2024
--	---

The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

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QUESTIONS, Page 5  
  
Action 321116

**QUESTIONS (continued)**

Operator:  COG PRODUCTION, LLC 600 W. Illinois Ave Midland, TX 79701	OGRID:  217955
	Action Number:  321116
	Action Type:  [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

**QUESTIONS**

<b>Deferral Requests Only</b>	
<i>Only answer the questions in this group if seeking a deferral upon approval this submission. Each of the following items must be confirmed as part of any request for deferral of remediation.</i>	
Requesting a deferral of the remediation closure due date with the approval of this submission	No

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QUESTIONS, Page 6  
  
Action 321116

QUESTIONS (continued)

Operator: COG PRODUCTION, LLC 600 W. Illinois Ave Midland, TX 79701	OGRID: 217955
	Action Number: 321116
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	{Unavailable.}

Remediation Closure Request	
Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.	
Requesting a remediation closure approval with this submission	No



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CONDITIONS  
  
Action 321116

CONDITIONS

Operator:  COG PRODUCTION, LLC 600 W. Illinois Ave Midland, TX 79701	OGRID:  217955
	Action Number:  321116
	Action Type:  [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

CONDITIONS

Created By	Condition	Condition Date
scott.rodgers	The Remediation Plan is Conditionally Approved. All samples must be analyzed for all constituents listed in Table I of 19.15.29.12 NMAC. Floor confirmation samples should be delineated/excavated to meet closure criteria standards for site assessment/characterization/proven depth to water determination. Sidewall samples should be delineated/excavated to 600 mg/kg for chlorides and 100 mg/kg for TPH to define the edge of the release. Confirmation samples should be collected every 200 ft2. All off pad areas must meet reclamation standards set forth in the OCD Spill Rule. The work will need to occur in 90 days after the work plan has been reviewed.	3/7/2024