



## **PROPOSED REMEDIATION PLAN UPDATE**

**PENASCO COMPRESSOR FACILITY  
32.714046, -104.449855  
UNIT SESE, SECTION 26, T18S-R25E  
EDDY COUNTY, NEW MEXICO  
NMOCD INCIDENT ID #NAPP2105437946**

**PREPARED BY:**

**RANGER ENVIRONMENTAL SERVICES, LLC  
P.O. BOX 201179  
AUSTIN, TEXAS 78720**

**JANUARY 9, 2024**

A blue ink signature of Mr. William Kierdorf, consisting of a stylized 'W' followed by several loops.

**Mr. William Kierdorf, REM  
Project Manager**

A blue ink signature of Mr. Patrick K. Finn, consisting of a stylized 'P' followed by several loops.

**Mr. Patrick K. Finn, P.G. (TX)  
Project Geologist**

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### FORM C-141

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**PROPOSED REMEDIATION PLAN UPDATE  
PENASCO COMPRESSOR FACILITY  
32.714046, -104.449855  
EDDY COUNTY, NEW MEXICO  
NMOCD INCIDENT ID #nAPP2105437946**

Ranger Environmental Services, LLC (Ranger) has prepared the following Proposed Remediation Plan Update to provide a revised proposed remediation strategy that is in accordance with the directives included in the November 27, 2023, New Mexico Oil Conservation Division (NMOCD) correspondence. The NMOCD response was in regard to the Ranger prepared *Site Characterization, Assessment, and Proposed Remediation Plan*, dated June 7, 2023.

The previously submitted proposed remediation plan is available via the NMOCD online incident portal (<https://wwwapps.emnrd.nm.gov/ocd/ocdpermitting/Data/Incidents/Incidents.aspx>). A copy of the referenced November 27, 2023 NMOCD correspondence is attached.

## **1.0 SITE INFORMATION AND BACKGROUND**

### **1.1 Site Location**

The Penasco Compressor Facility (Site) is located approximately 9.3 miles southwest of Artesia, within Eddy County, New Mexico. The Site is located in Township 18S, Range 25E, Section 26 at approximate GPS coordinates 32.714046, -104.449855.

Topographic and Area vicinity maps depicting the Site location and surrounding areas are attached.

### **1.2 Background & NMOCD Correspondence**

The Site was historically utilized for gas processing activities. As part of the gas processing activities, various equipment such as compressors, separators, storage tanks, and associated ancillary equipment were staged and operated at the Site. In early 2020, initial facility decommissioning activities were completed at the Site. As part of the decommissioning process, the on-site processing/production equipment, storage tanks, and buildings were removed from the location.

Ranger was retained to assist in the identification, assessment, and remediation of any environmental impacts present at the Site due to the historic operations. In 2020, Ranger personnel and representatives of EOG completed detailed assessment activities at the Site. The activities included the assessment of the Site in a grid pattern as well as more intensive assessment in observed Areas of Concern (AOCs). During the performance of the assessment activities at the Site, impacts associated with the historic site operations were discovered.

Figure 3 (*Assessment Grid and AOC Location Map*) depicts the referenced grid areas and AOC's included in the assessment process. Table 1 (*Initial Assessment Soil BTEX, TPH & Chloride Analytical Data*) provides a comprehensive summary of the analytical results for the soil samples collected during the initial assessment process. Complete details of the Site assessment

activities, including analytical laboratory reports, are provided in the previously submitted *Site Characterization, Assessment, and Proposed Remediation Plan*, dated June 7, 2023.

Starting In October 2020 communication and coordination with NMOCD was initiated and discussions between EOG and the former operator at the Site (Lucid Energy Partners) were completed in order to determine the appropriate remediation strategy for the Site. In June 2023, a Ranger prepared *Site Characterization, Assessment, and Proposed Remediation Plan*, dated June 7, 2023 was submitted to the NMOCD. The plan included full site characterization details, details of the assessment/delineation activities completed at the Site, and a proposed remedial strategy for the documented site impacts.

The proposed remedial strategy included the variance requests to allow for the utilization of the 19.15.29.12 NMAC Table 1 Closure Criteria for Soils impacted by a Release (Depth-to-Groundwater >100 Feet) Criteria and for the utilization of 20 mil synthetic liners, intended only as an additional protective measure at the Site. The plan also proposed the treatment of impacted material excavated at the Site via bioremediation product applications. It was proposed that once the material was documented to have chemical of concern (COC) concentrations within the applicable Table 1 Criteria, it would be utilized as backfill in the excavated areas.

On November 27, 2023, NMOCD representatives responded to the proposed remediation plan. The response included the approval of the proposed utilization of the 19.15.29.12 NMAC Table 1 Closure Criteria for Soils impacted by a Release (Depth-to-Groundwater >100 Feet) Criteria. However, the response also included the denial of the proposed 20 mil synthetic liners and the denial of the use of treated material as backfill.

The following proposal has been prepared to provide an updated remedial strategy that aligns with the directives included in the November 27, 2023 NMOCD correspondence.

### **1.3 NMOCD Approved Closure Criteria**

As referenced above, the *Site Characterization, Assessment, and Proposed Remediation Plan*, dated June 7, 2023 included a variance request from NMAC 19.15.29.12 Section C to allow for utilization of the 19.15.29.12 NMAC Table 1 Closure Criteria for Soils Impacted by a Release (Depth-to-Groundwater >100 Feet) Criteria. In the November 27, 2023 response, NMOCD representatives approved the utilization of the proposed criteria. As such, the remedial activities at the Site will utilize the 19.15.29.12 NMAC Table 1 Depth-to-Groundwater >100 Feet Criteria (NMOCD Approved Table 1 Closure Criteria) as the target soil concentrations for remedial activities. As the Site is no longer in use, the remedial activities in the zero-to-four-foot soil horizon will be compared to the 19.15.29.13 NMAC Restoration, Reclamation and Re-Vegetation Criteria (Restoration Criteria) in accordance with NMAC 19.15.29.13. The referenced regulatory criteria are summarized below:

**NMOCD APPROVED SITE CLOSURE CRITERIA\***

<b>REGULATORY STANDARD</b>	<b>CHLORIDE</b>	<b>TPH (GRO+DRO +MRO)</b>	<b>TPH (GRO+DRO)</b>	<b>BTEX</b>	<b>BENZENE</b>
19.15.29.12 NMAC Table 1 Closure Criteria for Soils Impacted by a Release (GW > 100')	20,000	2,500	1,000	50	10
19.15.29.13 NMAC Restoration, Reclamation and Re-Vegetation (Soils 0'-4')	600	100**	---	50**	10**

All Values Presented in Parts Per Million (mg/Kg)

\*The presented Table 1 criteria was approved by the NMOCD in the November 27, 2023 response to the Site Characterization, Assessment, and Proposed Remediation Plan, dated June 7, 2023.

\*\*Value derived from the State of New Mexico Energy, Minerals and Natural Resources Department document Procedures for the Implementation of the Spill Rule (19.15.29 NMAC) dated September 6, 2019.

\*\*\*Full site characterization details are included in the previously submitted Site Characterization, Assessment, and Proposed Remediation Plan, dated June 7, 2023.

## **2.0 AOC-1: FORMER CONDENSATE AND “CATCH-ALL” TANK BATTERY AREA**

Located in the northeastern corner of the former facility, AOC-1 formerly consisted of a lined tank battery containing condensate and “catch-all” tanks and was selected for more thorough assessment due the nature of historic operations and fluid storage in this area. Based on the results of the assessment activities completed in the AOC-1 area, remedial soil removal activities and confirmation soil sampling were completed in the area. Full details of the assessment and remedial efforts completed in the AOC-1 area are included in the *Site Characterization, Assessment, and Proposed Remediation Plan*, dated June 7, 2023.

The following section provides a summary of completed remedial efforts in the area, and an updated proposed remedial strategy for the material generated during the remedial efforts in the area.

### **2.1 Excavation and Confirmation Sampling (AOC-1)**

To address the documented impacts and bring AOC-1 into compliance with the Restoration Criteria and NMOCD Approved Table 1 Closure Criteria, soil removal operations were conducted in July and August 2020. Upon completion of the soil removal operations, the excavated area had maximum dimensions of approximately 100 feet by 50 feet with an initial maximum depth of approximately five feet.

During the July and August 2020 remedial efforts in the AOC-1 area, Ranger personnel completed cleanup confirmation soil sampling events in the excavated areas to determine whether the remedial efforts had been completed to appropriate boundaries. The cleanup confirmation soil samples were collected in accordance with NMAC 19.15.29 Section D, as five-part composite samples representative of no more than 200 square feet. The samples were collected from various locations along the excavation side walls and base. Based upon the initial cleanup confirmation soil sample results, any areas documented to contain remaining COC concentrations in exceedance of the NMOCD Approved Table 1 Closure Criteria and/or Restoration Criteria were further over-excavated and additional cleanup confirmation samples were collected.

Upon review of the final cleanup confirmation soil sample analytical results, all samples were documented to contain COC concentrations below the NMOCD Approved Table 1 Closure Criteria and/or Restoration Criteria. As such, no further excavation activities are required in the AOC-1 area.

Figure 4 (*AOC-1 Excavation and Soil Sample Location Map*) depicts the AOC-1 excavation area and associated cleanup confirmation soil sample locations. Table 2 (*AOC-1 Assessment Soil BTEX, TPH & Chloride Analytical Data*) provides a comprehensive summary of all AOC-1 assessment-related soil analytical data. Table 3 (*AOC-1 Excavation Area BTEX, TPH & Chloride Analytical Data*) provides a comprehensive summary of the AOC-1 cleanup confirmation soil sample analytical results. The associated laboratory analytical reports are available in the previously submitted *Site Characterization, Assessment, and Proposed Remediation Plan*, dated June 7, 2023. Full details of the remediation efforts in the area will be included in the subsequent Closure Report to be prepared upon completion of remedial efforts at the Site.

## **2.2 Excavated Material & Treatment Cell Footprint Evaluation (AOC-1)**

As detailed in the *Site Characterization, Assessment, and Proposed Remediation Plan*, dated June 7, 2023, the initial strategy for addressing the material generated during the remediation of the AOC-1 area included the performance of bioremedial treatment activities and re-use of the treated material as backfill. During the remediation process, the material was staged in a treatment cell located adjacent to the AOC-1 area. Treatment of the material was completed, and confirmation soil samples were collected from the treated material.

The November 27, 2023, NMOCD response denied the proposal for re-use of the treated material as backfill. As such, in December 2023, the material within the AOC-1 treatment cell was transported to an NMOCD approved facility for disposal.

To assess the former AOC-1 treatment cell location and ensure that all affected materials were removed for disposal, confirmation soil samples will be collected for laboratory analysis from the former footprint of the treatment cell. The soil samples will be collected as five-part composite samples representative of no more than 200 square feet in accordance with NMAC 19.15.29 Section D. Upon collection, the soil samples will be managed using industry standard QA/QC and chain-of-custody procedures and will be transported to an approved analytical laboratory for analysis of total petroleum hydrocarbons (TPH); benzene, toluene, ethylbenzene and xylenes (BTEX); and, total chloride using NMOCD approved laboratory methods.

As the samples will be collected from the 0'-4' bgs soil profile, the sample results will be compared to the NMAC Restoration Criteria. In the event that soils within the treatment cell are documented to contain COC concentrations above the Restoration Criteria, then these areas will be appropriately remediated. Figure 5 (*AOC-1 Treatment Cell Location Map*) depicts the former location of the AOC-1 Treatment Cell.

## **2.3 Excavation Completion (AOC-1)**

As summarized above, based upon the final AOC-1 cleanup confirmation soil sample analytical results, no additional remedial efforts are required in this area. Upon completion of all Site remedial efforts, the excavated area will be backfilled with clean fill material in accordance with NMAC 19.15.29.13. Reclamation efforts in the AOC-1 area will be completed in conjunction with the final reclamation of the former Penasco Compressor Facility pad.



### 3.0 AOC-7: FORMER COMPRESSOR AREA

Located in the south-central portion of the former facility, AOC-7 historically supported a compressor. Due to the historic AOC-7 area operations, this area was selected for a detailed assessment. Based on the assessment results for the AOC-7 area, remedial soil removal and cleanup confirmation soil sampling activities were completed in this area. Full details of the assessment and remediation activities completed in the AOC-7 area are included in the *Site Characterization, Assessment, and Proposed Remediation Plan*, dated June 7, 2023.

#### 3.1 Excavation and Confirmation Sampling (AOC-7)

To address the documented impacts in AOC-7, soil removal operations were conducted in July and August, 2020. Upon completion of excavation activities, the excavated area had maximum dimensions of approximately 45 feet by 35 feet with a maximum depth of approximately seven feet.

During the performance of the July and August 2020 remedial activities, Ranger personnel collected cleanup confirmation soil samples in the excavated areas to ensure that the remedial efforts had been completed to appropriate boundaries. The cleanup confirmation soil samples were collected in accordance with NMAC 19.15.29 Section D, as five-part composite samples representative of no more than 200 square feet. The samples were collected from various locations along the excavation side walls and base. Based upon the initial cleanup confirmation soil sample results, any areas documented to contain remaining COC concentrations in exceedance of the NMOCD Approved Table 1 Closure Criteria and/or Restoration Criteria were further over-excavated and additional cleanup confirmation samples were collected.

Upon review of the final cleanup confirmation soil sample analytical results, all samples were documented to contain COC concentrations below the NMOCD Approved Table 1 Closure Criteria and/or Restoration Criteria. As such, no further excavation activities are required in the AOC-7 area.

Figure 6 (*AOC-7 Excavation and Soil Sample Location Map*) depicts the AOC-7 excavation area and associated cleanup confirmation soil sample locations. Table 4 (*AOC-7 Assessment Soil BTEX, TPH & Chloride Analytical Data*) provides a comprehensive summary of all AOC-7 assessment-related soil analytical data. Table 5 (*AOC-7 Excavation Area BTEX, TPH & Chloride Analytical Data*) provides a comprehensive summary of the AOC-7 cleanup confirmation soil sample analytical results. The associated laboratory analytical reports are available in the previously submitted *Site Characterization, Assessment, and Proposed Remediation Plan*, dated June 7, 2023. Full details of the remediation efforts in the area will be included in the subsequent Closure Report to be prepared upon completion of remedial efforts at the Site.

#### 3.2 Excavated Material & Treatment Cell Footprint Evaluation (AOC-7)

As detailed in the *Site Characterization, Assessment, and Proposed Remediation Plan*, dated June 7, 2023, the initial strategy for addressing the material generated during the remediation of the AOC-7 area included the performance of bioremediation treatment activities and re-use of the treated material as backfill. During the remediation process, the material was staged in a treatment cell located adjacent to the AOC-7 area. Treatment of the material was completed, and confirmation soil samples were collected from the treated material.

The November 27, 2023, NMOCD response denied the proposal for re-use of the treated material as backfill. As such, in December 2023, the material within the AOC-7 treatment cell was transported to an NMOCD approved facility for disposal.

To assess the former AOC-7 treatment cell location and ensure that all affected materials were removed for disposal, confirmation soil samples will be collected for laboratory analysis from the former footprint of the treatment cell. The soil samples will be collected as five-part composite samples representative of no more than 200 square feet in accordance with NMAC 19.15.29 Section D. Upon collection, the soil samples will be managed using industry standard QA/QC and chain-of-custody procedures and will be transported to an approved analytical laboratory for analysis of TPH, BTEX, and total chloride using NMOCD approved laboratory methods.

As the samples will be collected from the 0'-4' below ground surface (bgs) soil profile, the sample results will be compared to the NMAC Restoration Criteria. In the event that soils within the treatment cell are documented to contain COC concentrations above the Restoration Criteria, then these areas will be appropriately remediated. Figure 7 (*AOC-7 Treatment Cell Location Map*) depicts the former location of the AOC-7 Treatment Cell.

### **3.3 Excavation Completion (AOC-7)**

As summarized above, based upon the final AOC-7 cleanup confirmation soil sample analytical results, no additional remedial efforts are required in this area. Upon completion of all Site remedial efforts, the excavated area will be backfilled with clean fill material in accordance with NMAC 19.15.29.13. Reclamation efforts in the AOC-1 area will be completed in conjunction with the final reclamation of the former Penasco Compressor Facility pad.

## **4.0 ASSESSMENT GRID E-4**

Located in the southeastern portion of the former facility, assessment grid E-4 is located immediately east of the AOC-7 area. During the initial assessment process on April 15, 2020, five test holes were installed within the grid area and four composite soil samples were collected for laboratory analysis. Sample E-4/2' (collected at a depth of two feet bgs) was noted to contain a TPH (GRO+DRO+MRO) concentration of 150 mg/Kg, which was in exceedance of the 100 mg/Kg Restoration Criteria. All other Grid E-4 samples were documented to contain TPH concentrations below the Reclamation Criteria and Table 1 Closure Criteria.

As illustrated in Figure 8 ("*Assessment Grid E-4 Sample Location Map*"), one of the Grid E-4 initial assessment test holes was installed in an area that was ultimately excavated as part of the AOC-7 remediation process. Based on the depth of the composite sample exhibiting the elevated TPH concentrations, the extent of the AOC-7 excavation area, and the soil conditions observed in the AOC-7 excavation area, it is believed that the AOC-7 impacts contributed to the elevated TPH concentration documented in this assessment grid composite sample. As such, it is believed that the elevated soil TPH concentrations in Grid E-4 have already been remediated.

To confirm that assessment grid E-4 is in attainment of the Restoration Criteria, it is proposed that four additional soil samples be collected at the approximate locations of the four test holes that were installed during the initial assessment outside of the AOC-7 excavation area. The samples will be collected from a depth of two feet, and will be collected as individual grab samples. The samples will subsequently be submitted for TPH, BTEX and chloride analysis utilizing the previously referenced laboratory methods.



## 5.0 ASSESSMENT GRID H-5

Located in the southeastern most portion of the Site, assessment grid H-5 was limited in size and as such the initial assessment sampling process utilized two test hole locations to assess the conditions within the grid. The samples collected from Grid H-5 at depths of two and three feet bgs were documented to contain chloride concentrations in exceedance of the Restoration Criteria. Additionally, the sample collected from a depth of two feet bgs was noted to contain a TPH (GRO+DRO+MRO) concentration in exceedance of the Restoration Criteria.

Due to the proximity to AOC-4, and the associated elevated soil COC concentrations within this area, remedial activities have been, and will be, completed in conjunction with the AOC-4 area remediation. Details of the previously completed activities and the proposed remedial actions are provided in Section 6.0.

## 6.0 AOC-4: FORMER PRODUCTION/PROCESSING EQUIPMENT AREA

Located in the southeastern corner of the former facility, AOC-4 formerly contained various production processing equipment and as such was selected for thorough assessment due the nature of the historic operations in this area. Based on the conditions documented during the assessment process, remedial efforts are necessary to bring the area into compliance with NMAC 19.15.29.

The previously proposed remedial strategy presented in the *Site Characterization, Assessment, and Proposed Remediation Plan*, dated June 7, 2023, included soil removal operations, installation of a synthetic liner, and bioremedial treatment of excavated soils for re-use as backfill material. Based on the November 27, 2023 NMOCD response to the proposed plan, the utilization of the proposed synthetic liner and re-use of treated material for backfilling purposes was denied. Below is an updated proposed remedial strategy which incorporates the directives included in the November 27, 2023 NMOCD response.

### 6.1 AOC-4-6 & Grid H-5 Area Excavation

To address the documented chloride and TPH exceedances in the area of assessment grid H-5 and sample location AOC-4-6, soil removal operations were conducted in these areas in April and May, 2020. Upon completion of the removal operations, the excavation area was irregular in shape and had maximum dimensions of approximately 82 feet by 62 feet with a maximum depth of approximately 4 feet. The excavation area is illustrated in Figure 9 ("*AOC-4 Proposed Excavation Map*"). Approximately 500 cubic yards of soil were generated during the removal process. The excavated soil generated during the removal process was transported off site to the Lea Land, Inc. disposal facility in Lea County, New Mexico for disposal.

Due to the ongoing remedial activities in the area of sample location AOC-4-7, detailed below, the cleanup confirmation sampling of the excavated area associated with Grid H-5 and AOC-4-6 is proposed to be completed in conjunction with the AOC-4-7 area.

### 6.2 AOC-4 Area Remediation

In order to address the soil impacts in the AOC-4 area, the following remedial efforts are proposed:

#### Soil Removal

To address the documented impacts in the AOC-4 area, soil removal operations are proposed. Utilizing the information gathered during the assessment process, excavation will be completed to various depths ranging from three feet bgs to a maximum estimated depth of approximately 23 feet bgs. Figure 9 ("*AOC-4 Proposed Excavation Map*") depicts the proposed excavation areas and their associated depths as well as sample locations completed during the assessment process. It is anticipated that approximately 1,400 cubic yards of soil will be removed from the area. The material generated during the excavation process will be transported and disposed of at a NMOCD approved disposal facility.

It should be noted that the proposed excavation map does not include excavation benching, shoring, and other stability/safety measures that may be necessary for the excavation activities to be completed in a safe manner. All appropriate safety measures will be undertaken where necessary.

In order to expedite the remedial process and move the project towards completion, soil removal operations were initiated in the AOC-4 area in December 2023 and are continuing. Full details of the final excavated areas, cleanup confirmation sampling, and sample results will be included in the subsequent Closure Report.

#### Cleanup Confirmation Sampling

Upon completion of the soil removal operations, cleanup confirmation soil samples will be collected from the excavated areas. Based on the directive included in the November 27, 2023 NMOCD response, cleanup confirmation soil samples be collected in accordance with NMAC 19.15.29.12 (D) as five-point composite samples representing no greater than 200 square feet.

Upon collection, the cleanup confirmation soil samples will be managed using industry standard QA/QC and chain-of-custody procedures and will be transported to an analytical laboratory for BTEX, TPH and chloride analysis using approved laboratory methods. The samples collected from the 0'-4' bgs soil profile will be compared to the NMAC Restoration Criteria. Samples collected from depths beyond four feet bgs will be compared to the NMOCD Approved Table 1 Closure Criteria.

#### Excavation Backfill

Upon confirmation that the excavated area is in attainment of the Restoration Criteria and NMOCD Approved Table 1 Closure Criteria, the excavated area associated with the AOC-4 remediation process will be backfilled. Based on the findings of the grid assessment sampling completed during the performance of the initial assessment activities, as detailed the previously supplied *Site Characterization, Assessment, and Proposed Remediation Plan*, dated June 7, 2023, it is proposed to utilize the facility pad material as backfill material for the AOC-4 area. The material selected for use will be limited to those grid sampling sections that were documented to contain COC concentrations at or below the Reclamation Criteria standards. The remaining upper one foot of the excavation will be filled with clean topsoil material as required by NMAC 19.15.29.13.

## 7.0 PROPOSED UPDATED REMEDIATION ACTIVITY SUMMARY

Below is a summary of the updated proposed remediation activities:

### 19.15.29.12 Table 1 Closure Criteria (Section 1.3)

- Based on the November 27, 2023 response from the NMOCD, the 19.15.29.12 NMAC Table 1 Depth-to-Groundwater >100' Criteria will be utilized as the target cleanup criteria.
- Remedial efforts in the surface to four-foot depth interval will be completed to the 19.15.29.13 NMAC Restoration, Reclamation and Re-Vegetation Criteria.

### AOC-1 (Section 2.0)

- Based on the remedial efforts completed in this area and the related cleanup confirmation soil sample results, no additional removal efforts are proposed.
- The material contained within the AOC-1 treatment cell has been removed and transported to disposal.
- To confirm that no soil impacts associated with the treatment activities are present in the footprint of the former treatment cell location, assessment soil sampling is proposed. If any elevated COC concentrations are encountered, they will be properly addressed.

### AOC-7 (Section 3.0)

- Based on the remedial efforts completed in this area and the related cleanup confirmation soil sample results, no additional removal efforts are proposed.
- The material contained within the AOC-7 treatment cell has been removed and transported to disposal.
- To confirm that no soil impacts associated with the treatment activities are present in the footprint of the former treatment cell location, assessment soil sampling is proposed. If any elevated COC concentrations are encountered, they will be properly addressed.

### Grid E-4 (Section 4.0)

- To determine if the area is within the Reclamation Criteria, it is proposed to collect additional grab soil samples from the locations included in the initial assessment.

### AOC-4 (Section 5.0)

- To address the remaining elevated soil COC concentrations in this area, it is proposed to conduct further soil removal to varying depths utilizing the 19.15.29.12 NMAC Table 1 Depth-to-Groundwater >100' Criteria as the target cleanup criteria as approved by the NMOCD.

## 8.0 REMEDIATION SCHEDULE AND CLOSURE REPORTING

As detailed above, the additional soil removal operations in the AOC-4 area have already been initiated. The proposed assessment of the Grid E-4 area, and the AOC-1 and AOC-7 treatment cells will be completed as detailed above. Due to the scale and nature of the remaining proposed remedial activities, EOG respectfully requests 120 days to complete the proposed soil removal operations and cleanup confirmation sampling activities.

Upon completion of all proposed remedial activities and confirmation that the area has been brought into compliance with the proposed site closure criteria, a detailed Closure Report will be prepared and submitted in accordance with NMAC 19.15.29.12.

## **9.0 LIMITATIONS**

This investigation was performed in accordance with generally accepted practices of the profession undertaking similar studies at the same time and in the same geographical area. Ranger observed that degree of care and skill generally exercised by the profession under similar circumstances and conditions. No other warranty is expressed or implied. The investigation's conclusions and recommendations are based upon the available data and data obtained from a limited number of samples taken at specific locations.

FORM C-141

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	nAPP2105437946
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party EOG Resources, Inc.	OGRID 7377
Contact Name Chase Settle	Contact Telephone 575-748-1471
Contact email Chase_Settle@eogresources.com	Incident # (assigned by OCD)
Contact mailing address 104 S. 4th Street, Artesia, NM 88210	

Location of Release Source

Latitude 32.714046° Longitude -104.449855°  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name Penasco Compressor Facility	Site Type Former Compressor Facility
Date Release Discovered Unknown	API# (if applicable)

Unit Letter	Section	Township	Range	County
SESE	26	18S	25E	Eddy

Surface Owner: ☐ State ☐ Federal ☐ Tribal ☒ Private (Name: Lucid Energy Group)

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 checked="" type="checkbox"/> Other (describe)	Volume/Weight Released (provide units) Unknown	Volume/Weight Recovered (provide units)

Cause of Release Unknown – Apparent historic releases.




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

### 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: There was no recent release. The affected soils at this site appear to be from an unknown, historic release.	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
Printed Name: <u>Chase Settle</u>	Title: <u>Rep Safety &amp; Environmental II</u>
Signature: <u></u>	Date: <u>02/18/2021</u>
email: <u>Chase_Settle@eogresources.com</u>	Telephone: <u>575-748-1471</u>
<b><u>OCD Only</u></b>	
Received by: <u>Jocelyn Harimon</u>	Date: <u>08/02/2022</u>

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

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

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

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

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

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Oil Conservation Division

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

Printed Name: Chase SettleTitle: Rep Safety & Environmental IISignature: Date: 02/18/2021email: Chase\_Settle@eogresources.comTelephone: 575-748-1471**OCD Only**Received by: Jocelyn HarimonDate: 06/07/2022

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: Chase SettleTitle: Rep Safety & Environmental IISignature: *Chase Settle*Date: 02/18/2021email: Chase\_Settle@eogresources.comTelephone: 575-748-1471**OCD Only**Received by: Jocelyn HarimonDate: 08/02/2022

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

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

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

Incident ID	nAPP2105437946
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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: Chase Settle Title: Rep Safety & Environmental Sr  
Signature: Chase Settle Date: 1/18/2024  
email: Chase\_Settle@eogresources.com Telephone: 575-748-1471

**OCD Only**

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

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

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

## FIGURES

Figure 1 – Topographic Map

Figure 2 – Area Map

Figure 3 – Assessment Grid and AOC Location Map

Figure 4 – AOC-1 Excavation and Soil Sample Location Map

Figure 5 – AOC-1 Treatment Cell Location Map

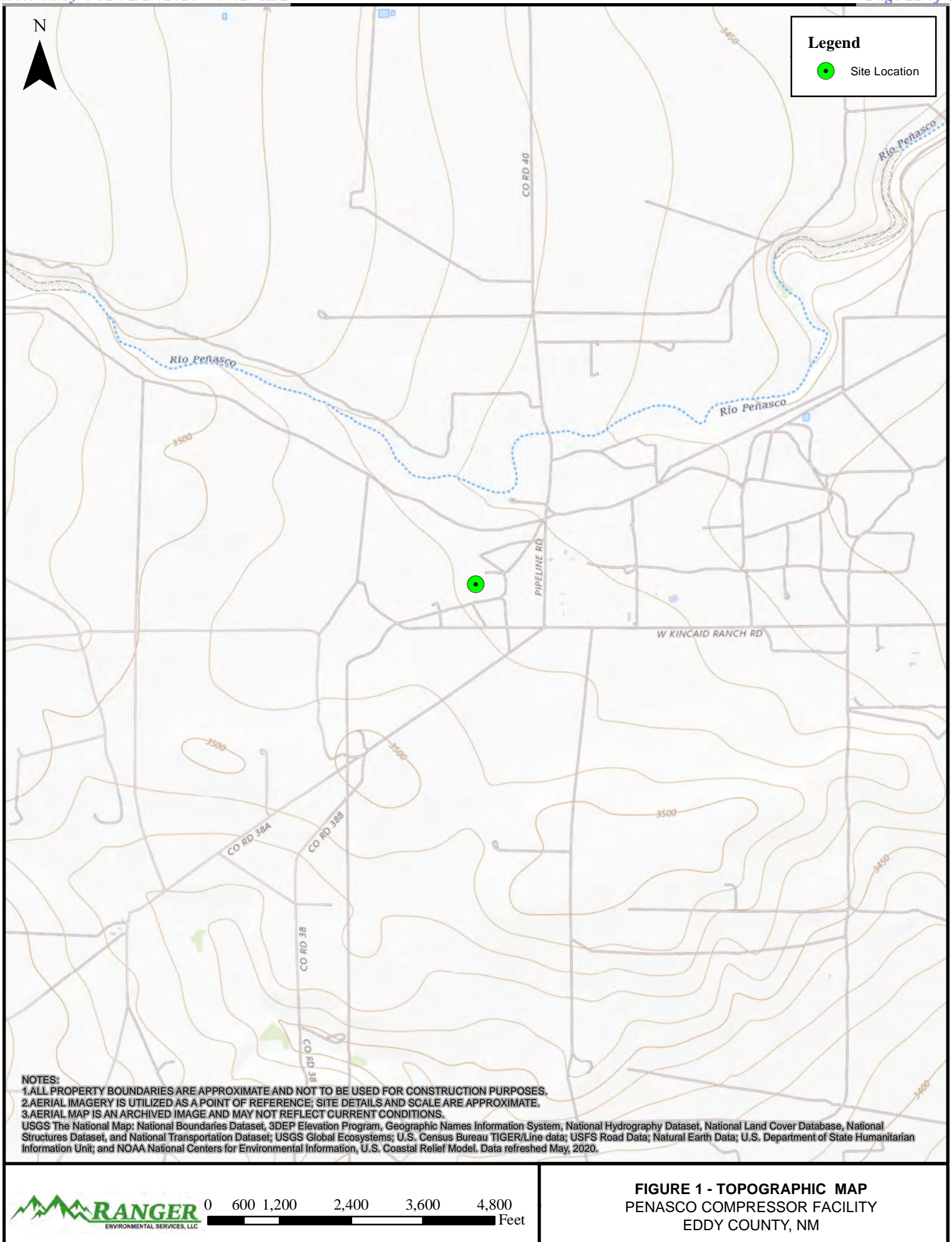
Figure 6 – AOC-7 Excavation and Soil Sample Location Map

Figure 7 – AOC-7 Treatment Cell Location Map

Figure 8 – Assessment Grid E-4 Sample Location Map

Figure 9 – AOC-4 Proposed Excavation Map





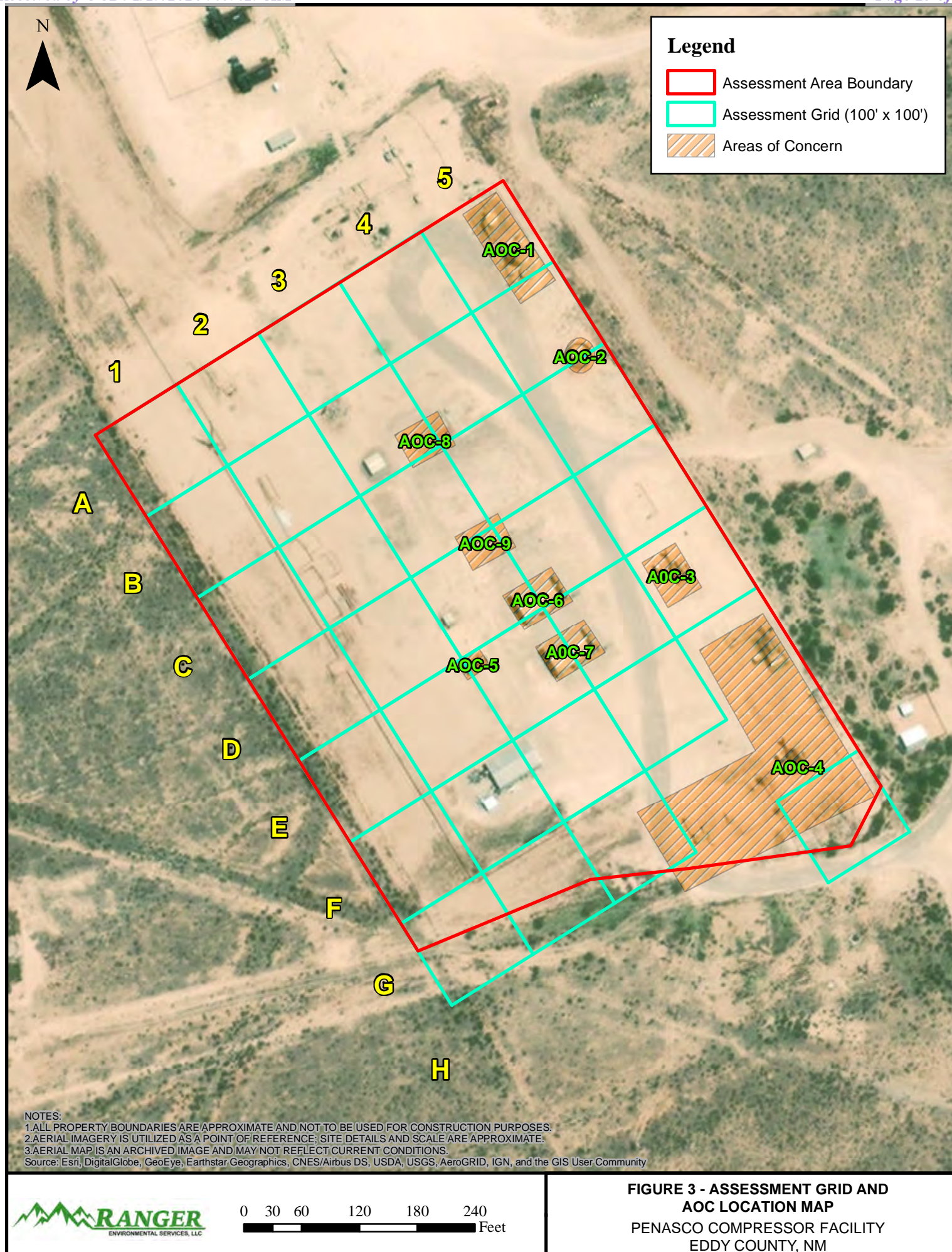




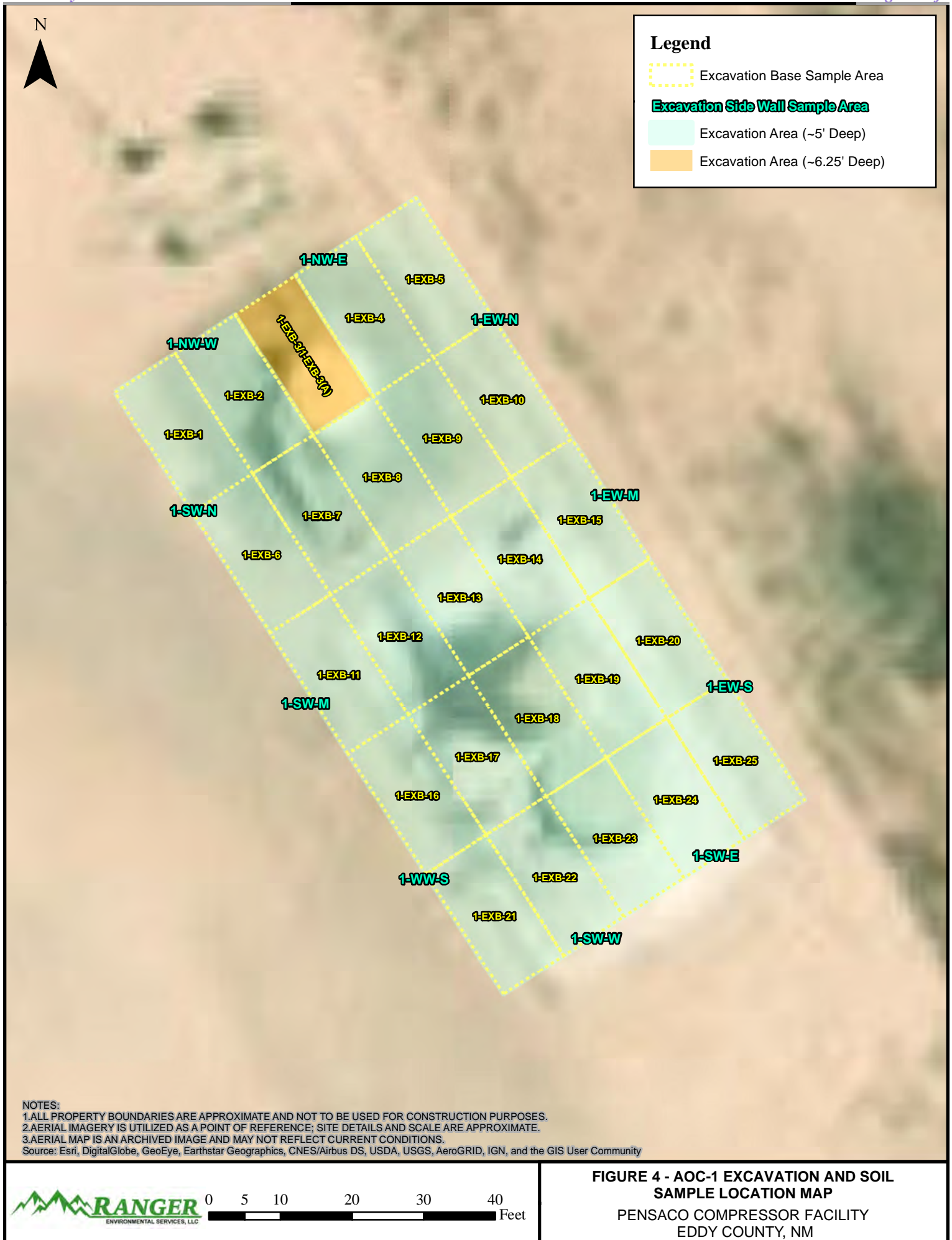
0 215 430 860 1,290 1,720 Feet

**FIGURE 2 - AREA MAP**  
PENASCO COMPRESSOR FACILITY  
EDDY COUNTY, NM







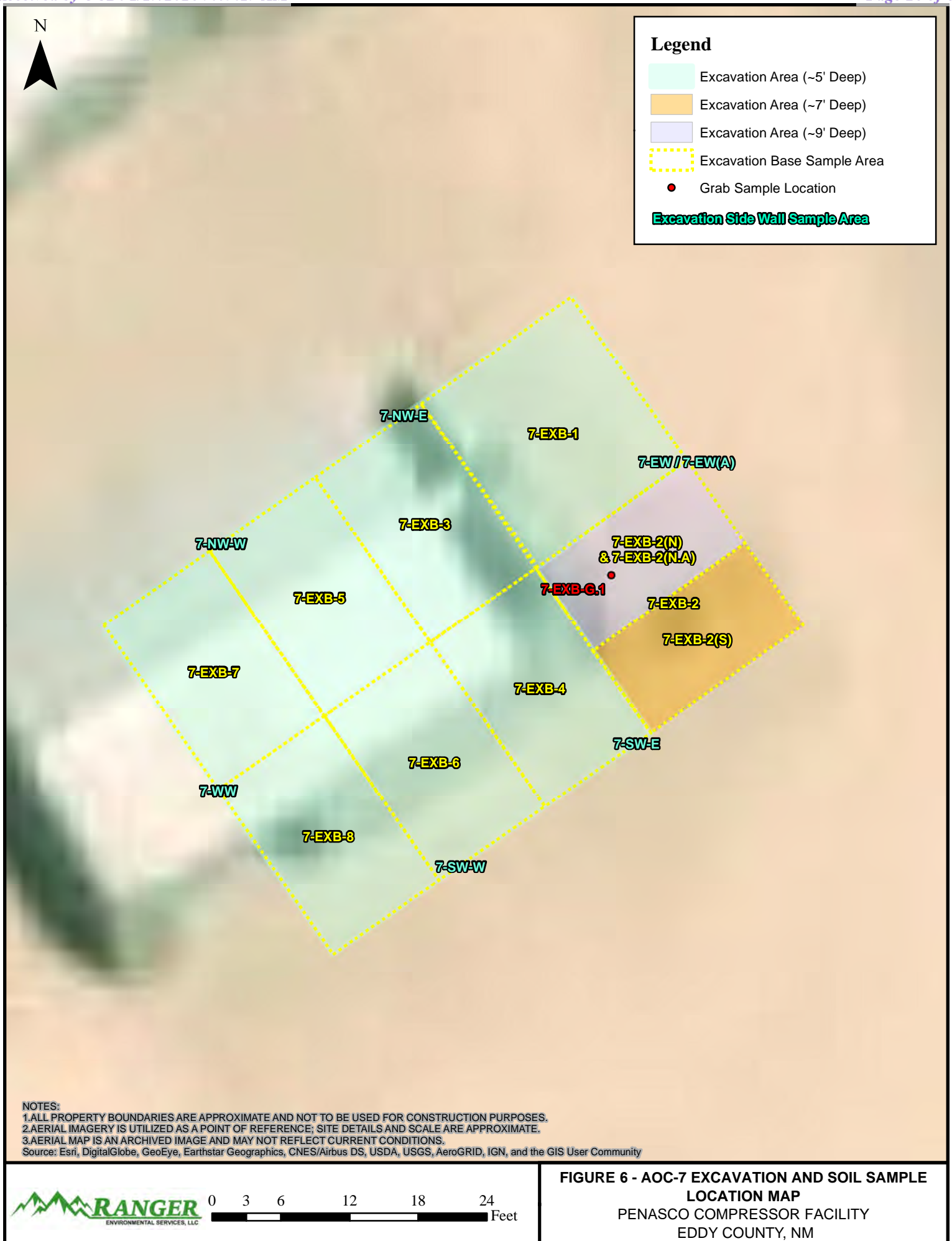




0 5 10 20 30 40  
Feet

**FIGURE 5 - AOC-1 TREATMENT CELL LOCATION MAP**  
PENASCO COMPRESSOR STATION  
EDDY COUNTY, NM



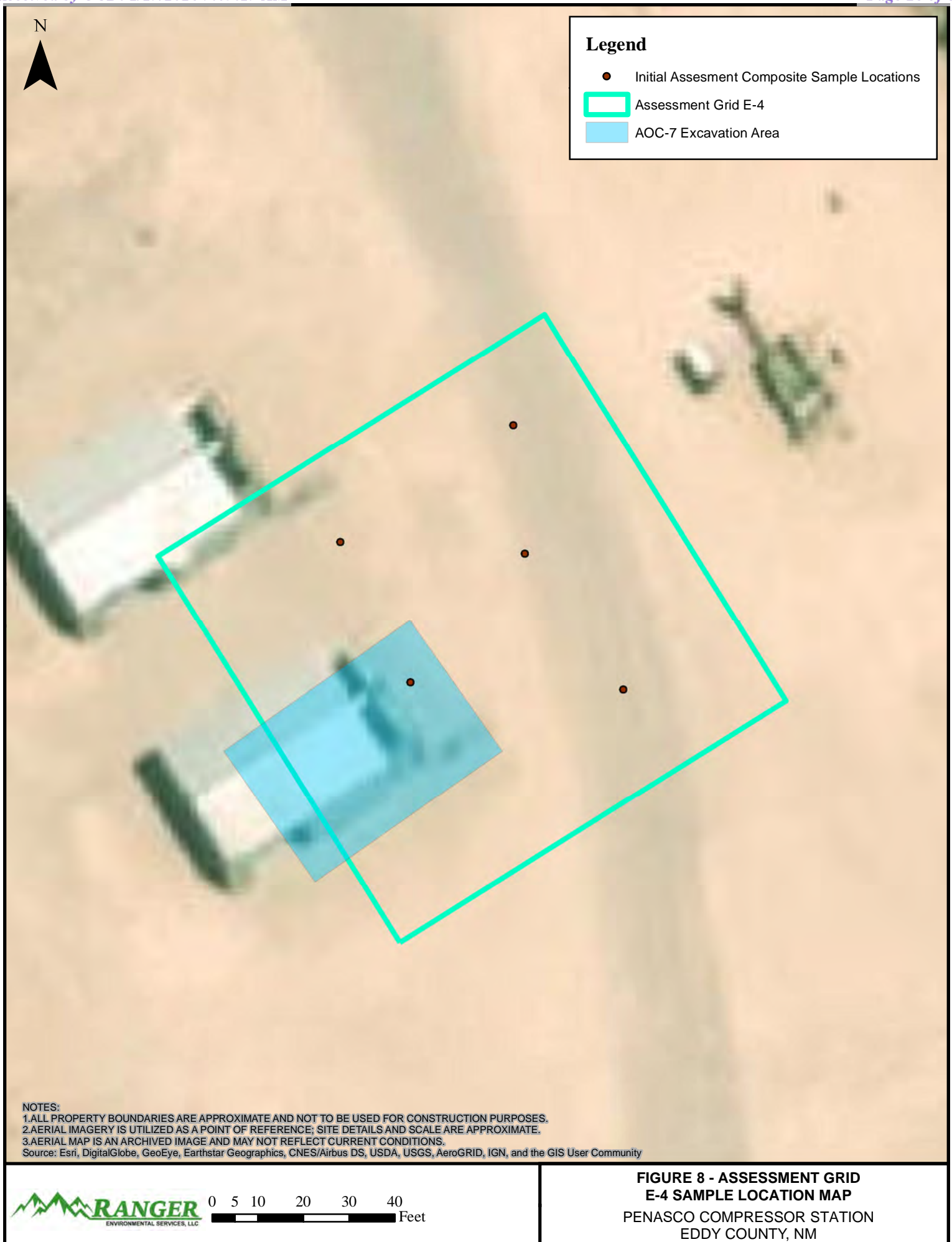




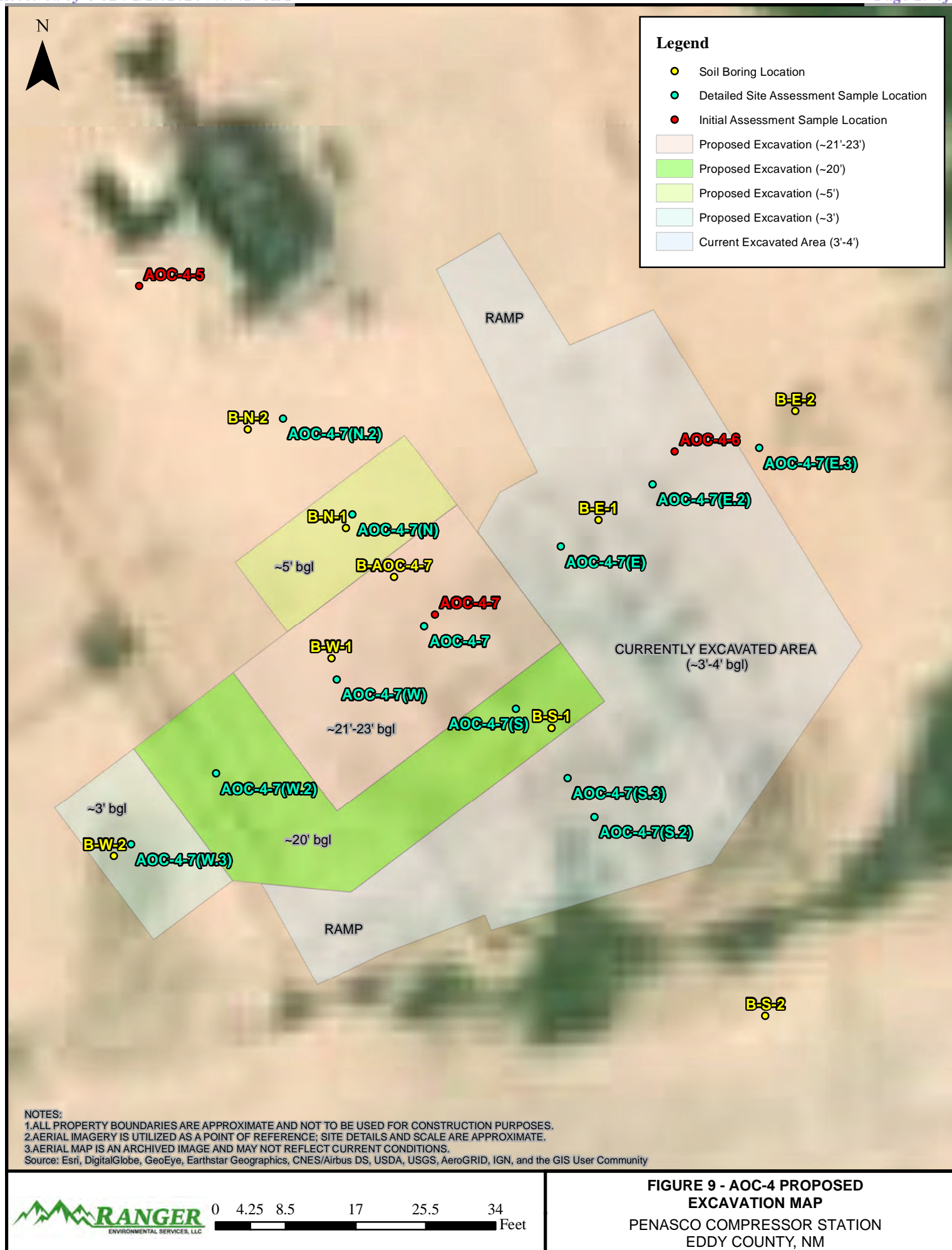


0 5 10 20 30 40  
Feet

**FIGURE 7 - AOC-7 TREATMENT CELL LOCATION MAP**  
PENASCO COMPRESSOR STATION  
EDDY COUNTY, NM







## TABLES

Table 1 – Initial Assessment Soil BTEX, TPH & Chloride Analytical Data

Table 2 – AOC-1 Assessment Soil BTEX, TPH & Chloride Analytical Data

Table 3 – AOC-1 Excavation Area BTEX, TPH & Chloride Analytical Data

Table 4 - AOC-7 Assessment Soil BTEX, TPH & Chloride Analytical Data

Table 5 – AOC-7 Excavation Area BTEX, TPH & Chloride Analytical Data

Table 6 – AOC-4 Area Comprehensive BTEX, TPH & Chloride Analytical Data

**TABLE 1 - INITIAL ASSESSMENT SOIL BTEX (EPA 8260), TPH (EPA 8015) & CHLORIDE (EPA 300) ANALYTICAL DATA**  
**PENASCO COMPRESSOR FACILITY**  
**EDDY COUNTY, NEW MEXICO**

All values presented in parts per million (mg/Kg)

SAMPLE ID	DATE	DEPTH (FT)	BENZENE	TOLUENE	ETHYL-BENZENE	TOTAL XYLENES	TOTAL BTEX	TPH GRO C6-C10	TPH DRO C10-C28	TPH MRO C28-C36	TPH (GRO+DRO)	TPH (GRO+DRO+MRO)	CHLORIDE
<b>Area of Concern (AOC) Grab Soil Samples</b>													
<b>AOC-1: Former Condensate and "Catch-all" Tank Battery Area</b>													
AOC-1-S/1'	4/13/2020	1'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.7	230	<14.6	230	<60
AOC-1-S/2'	4/13/2020	2'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.1	<46	<13.9	<59.9	<60
AOC-1-S/3'	4/13/2020	3'	<0.024	<0.047	<0.047	<0.094	<0.212	<4.7	<9.4	<47	<14.1	<61.1	<60
AOC-1-S/4'	4/13/2020	4'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<9.6	<48	<14.6	<62.6	<60
AOC-1-M/1'	4/13/2020	1'	<2.3	23	7.5	45	75.50	1,300	78	130	1,378	1,508	<60
AOC-1-M/2'	4/13/2020	2'	0.76	29	9	53	91.76	1,800	66	84	1,866	1,950	<60
AOC-1-M/3'	4/13/2020	3'	0.17	7.3	3.1	20	30.57	590	24	<49	614	614	<60
AOC-1-M/4'	4/13/2020	4'	0.28	7.3	2.3	14	23.88	450	<8.3	<41	450	450	<60
AOC-1-N/1'	4/13/2020	1'	0.13	0.22	0.36	4	4.71	220	250	390	470	860	<60
AOC-1-N/2'	4/13/2020	2'	1.9	7.4	5.1	59	73.4	2,400	810	280	3,210	3,490	<60
AOC-1-N/3'	4/13/2020	3'	<0.12	0.47	0.45	5.7	6.62	340	190	110	530	640	<61
AOC-1-N/4'	4/13/2020	4'	<0.12	0.21	0.21	2.5	2.92	190	130	62	320	382	<60
<b>AOC-2: Former Methanol Storage/Containment Area</b>													
AOC-2/1'	4/13/2020	1'	<0.024	<0.047	<0.047	<0.095	<0.213	<4.7	<9.3	<46	<14	<60	<60
AOC-2/2'	4/13/2020	2'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.4	<47	<14.3	<61.3	<60
AOC-2/3'	4/13/2020	3'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.2	<46	<14	<60	<60
AOC-2/4'	4/13/2020	4'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.6	<48	<14.4	<62.4	<60
<b>AOC-2: Former Methanol Storage/Containment Area</b>													
AOC-3-N/1'	4/13/2020	1'	<0.024	<0.047	<0.047	<0.094	<0.212	<4.7	<9.8	<49	<14.5	<63.5	130
AOC-3-N/2'	4/13/2020	2'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.9	<50	<14.7	<64.7	<60
AOC-3-N/3'	4/13/2020	3'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<10	<50	<15	<65	<60
AOC-3-N/4'	4/13/2020	4'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.9	<49	<14.9	<63.9	<60
AOC-3-S/1'	4/13/2020	1'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.6	<48	<14.5	<62.5	<60
AOC-3-S/2'	4/13/2020	2'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.8	<49	<14.6	<63.6	<60
AOC-3-S/3'	4/13/2020	3'	<0.024	<0.047	<0.047	<0.095	<0.213	<4.7	<9.8	<49	<14.5	<63.5	<60
AOC-3-S/4'	4/13/2020	4'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.7	<48	<14.6	<62.6	<60
<b>AOC-4: Former Production/Processing Equipment Area</b>													
AOC-4-1/1'	4/13/2020	1'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.8	<49	<14.8	<63.8	280
AOC-4-1/2'	4/13/2020	2'	<0.023	<0.046	<0.046	<0.093	<0.208	<4.6	<9.8	<49	<14.4	<63.4	260
AOC-4-1/3'	4/13/2020	3'	<0.024	<0.047	<0.047	<0.094	<0.212	<4.7	<9.4	<47	<14.1	<61.1	180
AOC-4-1/4'	4/13/2020	4'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<10	<50	<14.8	<64.8	150
AOC-4-2/1'	4/13/2020	1'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<10	<50	<14.8	<64.8	<60
AOC-4-2/2'	4/13/2020	2'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<9.9	<49	<14.8	<63.8	<60
AOC-4-2/3'	4/13/2020	3'	<0.023	<0.046	<0.046	<0.092	<0.207	<4.6	<9.9	<49	<14.5	<63.5	290
AOC-4-2/4'	4/13/2020	4'	<0.024	<0.047	<0.047	<0.095	<0.213	<4.7	<9.7	<49	<14.4	<63.4	310
AOC-4-3/1'	4/13/2020	1'	<0.023	<0.047	<0.047	<0.093	<0.21	<4.7	<9.9	<50	<14.6	<64.6	<60
AOC-4-3/2'	4/13/2020	2'	<0.024	<0.047	<0.047	<0.094	<0.212	<4.7	<9.8	<49	<14.5	<63.5	<60
AOC-4-3/3'	4/13/2020	3'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.2	<46	<14	<60	<59
AOC-4-3/4'	4/13/2020	4'	<0.023	<0.047	<0.047	<0.093	<0.21	<4.7	<8.8	<44	<13.5	<57.5	<61

NA = Not Analyzed  
 TPH = Total Petroleum Hydrocarbons  
 mg/Kg = Milligrams per Kilogram

**TABLE 1 - INITIAL ASSESSMENT SOIL BTEX (EPA 8260), TPH (EPA 8015) & CHLORIDE (EPA 300) ANALYTICAL DATA**  
**PENASCO COMPRESSOR FACILITY**  
**EDDY COUNTY, NEW MEXICO**

All values presented in parts per million (mg/Kg)

SAMPLE ID	DATE	DEPTH (FT)	BENZENE	TOLUENE	ETHYL-BENZENE	TOTAL XYLENES	TOTAL BTEX	TPH GRO C6-C10	TPH DRO C10-C28	TPH MRO C28-C36	TPH (GRO+DRO)	TPH (GRO+DRO+MRO)	CHLORIDE
AOC-4-4/1'	4/13/2020	1'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.9	<49	<14.8	<63.8	240
AOC-4-4/2'	4/13/2020	2'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.9	<50	<14.8	<64.8	340
AOC-4-4/3'	4/13/2020	3'	<0.024	<0.048	<0.048	<0.095	<0.215	<4.8	<9.3	<47	<14.1	<61.1	320
AOC-4-4/4'	4/13/2020	4'	<0.023	<0.046	<0.046	<0.093	<0.208	<4.6	<9.4	<47	<14	<61	190
AOC-4-5/1'	4/13/2020	1'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.9	<50	<14.9	<64.9	<60
AOC-4-5/2'	4/13/2020	2'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.8	<49	<14.7	<63.7	<60
AOC-4-5/3'	4/13/2020	3'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.2	<46	<14.1	<60.1	<60
AOC-4-5/4'	4/13/2020	4'	<0.023	<0.047	<0.047	<0.093	<0.21	<4.7	<9.4	<47	<14.1	<61.1	<61
AOC-4-6/1'	4/13/2020	1'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.7	<48	<14.5	<62.5	510
AOC-4-6/2'	4/13/2020	2'	<0.024	<0.047	<0.047	<0.095	<0.213	<4.7	<9.4	<47	<14.1	<61.1	840
AOC-4-6/3'	4/13/2020	3'	<0.023	<0.047	<0.047	<0.093	<0.21	<4.7	<9.2	<46	<13.9	<59.9	580
AOC-4-6/4'	4/13/2020	4'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.4	<47	<14.4	<61.4	470
AOC-4-7/1'	4/13/2020	1'	<0.12	<0.24	<0.24	<0.47	<1.07	<24	4,200	2,900	4,200	7,100	130
AOC-4-7/2'	4/13/2020	2'	<0.12	<0.24	<0.24	<0.48	<1.08	<24	3,800	3,100	3,800	6,900	96
AOC-4-7/3'	4/13/2020	3'	<1.2	<2.4	13	21	34	800	8,200	3,200	9,000	12,200	100
AOC-4-7/4'	4/13/2020	4'	<0.47	<0.93	13	32	45	970	5,700	2,200	6,670	8,870	66
AOC-4-8/1'	4/13/2020	1'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.1	<45	<14	<59	220
AOC-4-8/2'	4/13/2020	2'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<9.6	<48	<14.6	<62.6	180
AOC-4-8/3'	4/13/2020	3'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.9	<49	<14.8	<63.8	140
AOC-4-8/4'	4/13/2020	4'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<10	<50	<14.8	<64.8	110
AOC-4-9/1'	4/13/2020	1'	<0.023	<0.047	<0.047	<0.094	<0.211	<4.7	<9.6	<48	<14.3	<62.3	260
AOC-4-9/2'	4/13/2020	2'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.8	<49	<14.6	<63.6	250
AOC-4-9/3'	4/13/2020	3'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<10	<50	<15	<65	220
AOC-4-9/4'	4/13/2020	4'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<9.7	<48	<14.6	<62.6	120
AOC-4-10/1'	4/13/2020	1'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.8	<49	<14.8	<63.8	180
AOC-4-10/2'	4/13/2020	2'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<9.7	<49	<14.7	<63.7	120
AOC-4-10/3'	4/13/2020	3'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.7	<49	<14.6	<63.6	250
AOC-4-10/4'	4/13/2020	4'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.7	<48	<14.5	<62.5	300
<b>AOC-5: Former Fluid Storage/Containment Area</b>													
AOC-5/1'	4/13/2020	1'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<10	<50	<14.9	<64.9	160
AOC-5/2'	4/13/2020	2'	<0.024	<0.047	<0.047	<0.095	<0.213	<4.7	<9.8	<49	<14.5	<63.5	74
AOC-5/3'	4/13/2020	3'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.8	<49	<14.7	<63.7	<59
AOC-5/4'	4/13/2020	4'	<0.024	<0.047	<0.047	<0.095	<0.213	<4.7	<9.7	<48	<14.4	<62.4	<59

NA = Not Analyzed  
TPH = Total Petroleum Hydrocarbons  
mg/Kg = Milligrams per Kilogram



**TABLE 1 - INITIAL ASSESSMENT SOIL BTEX (EPA 8260), TPH (EPA 8015) & CHLORIDE (EPA 300) ANALYTICAL DATA**  
**PENASCO COMPRESSOR FACILITY**  
**EDDY COUNTY, NEW MEXICO**

All values presented in parts per million (mg/Kg)

SAMPLE ID	DATE	DEPTH (FT)	BENZENE	TOLUENE	ETHYL-BENZENE	TOTAL XYLENES	TOTAL BTEX	TPH GRO C6-C10	TPH DRO C10-C28	TPH MRO C28-C36	TPH (GRO+DRO)	TPH (GRO+DRO+MRO)	CHLORIDE
<b>AOC-6: Former Compressor Area</b>													
AOC-6-E/1'	4/13/2020	1'	<0.023	<0.046	<0.046	<0.092	<0.207	<4.6	<9.0	98	<13.6	98	86
AOC-6-E/2'	4/13/2020	2'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<9.4	<47	<14.3	<61.3	<61
AOC-6-E/3'	4/13/2020	3'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<8.8	<44	<13.7	<57.7	<60
AOC-6-E/4'	4/13/2020	4'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.8	<49	<14.6	<63.6	<60
AOC-6-W/1'	4/13/2020	1'	<0.023	<0.046	<0.046	<0.093	<0.208	<4.6	<9.7	<48	<14.3	<62.3	<60
AOC-6-W/2'	4/13/2020	2'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.5	<47	<14.3	<61.3	<60
AOC-6-W/3'	4/13/2020	3'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<10	<50	<14.9	<64.9	<60
AOC-6-W/4'	4/13/2020	4'	<0.024	<0.047	<0.047	<0.095	<0.213	<4.7	<9.9	<49	<14.6	<63.6	<60
<b>AOC-7: Former Compressor Area</b>													
AOC-7-E/1'	4/13/2020	1'	<0.023	<0.047	<0.047	<0.093	<0.21	<4.7	9.8	240	9.8	249.8	150
AOC-7-E/2'	4/13/2020	2'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.3	<47	<14.1	<61.1	140
AOC-7-E/3'	4/13/2020	3'	<0.023	<0.047	<0.047	<0.094	<0.211	<4.7	27	410	27	437	140
AOC-7-E/4'	4/13/2020	4'	<0.049	<0.097	<0.097	<0.19	<0.433	<9.7	<100	4,100	<109.7	4,100	85
AOC-7-W/1'	4/13/2020	1'	<0.024	<0.047	<0.047	<0.095	<0.213	<4.7	<9.3	<47	<14	<61	<60
AOC-7-W/2'	4/13/2020	2'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.3	<46	<14.2	<60.2	<60
AOC-7-W/3'	4/13/2020	3'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.8	<49	<14.7	<63.7	<60
AOC-7-W/4'	4/13/2020	4'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.8	<49	<14.6	<63.6	<60
<b>AOC-8: Former Compressor Area</b>													
AOC-8-E/1'	4/13/2020	1'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.4	<47	<14.3	<61.3	<60
AOC-8-E/2'	4/13/2020	2'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.7	<49	<14.5	<63.5	<60
AOC-8-E/3'	4/13/2020	3'	<0.023	<0.047	<0.047	<0.094	<0.211	<4.7	<9.3	<47	<14	<61	<60
AOC-8-E/4'	4/13/2020	4'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.5	<47	<14.3	<61.3	<60
AOC-8-W/1'	4/13/2020	1'	<0.023	<0.047	<0.047	<0.093	<0.21	<4.7	<9.3	76	<14	76	<59
AOC-8-W/2'	4/13/2020	2'	<0.023	<0.046	<0.046	<0.092	<0.207	<4.6	<9.4	49	<14	49	<60
AOC-8-W/3'	4/13/2020	3'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.8	<49	<14.7	<63.7	<60
AOC-8-W/4'	4/13/2020	4'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.8	<49	<14.6	<63.6	<60
<b>AOC-9: Former Compressor Area</b>													
AOC-9-E/1'	4/13/2020	1'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.4	<47	<14.3	<61.3	<60
AOC-9-E/2'	4/13/2020	2'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.4	<47	<14.3	<61.3	<60
AOC-9-E/3'	4/13/2020	3'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.7	<49	<14.6	<63.6	71
AOC-9-E/4'	4/13/2020	4'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.8	93.5	<108.3	93.5	<60
AOC-9-W/1'	4/13/2020	1'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.4	<47	<14.2	<61.2	<60
AOC-9-W/2'	4/13/2020	2'	<0.023	<0.046	<0.046	<0.093	<0.208	<4.6	<9.8	<49	<14.4	<63.4	<60
AOC-9-W/3'	4/13/2020	3'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<9.9	<50	<14.9	<64.9	<60
AOC-9-W/4'	4/13/2020	4'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<9.1	<45	<14.1	<59.1	<60

NA = Not Analyzed  
 TPH = Total Petroleum Hydrocarbons  
 mg/Kg = Milligrams per Kilogram

**TABLE 1 - INITIAL ASSESSMENT SOIL BTEX (EPA 8260), TPH (EPA 8015) & CHLORIDE (EPA 300) ANALYTICAL DATA**  
**PENASCO COMPRESSOR FACILITY**  
**EDDY COUNTY, NEW MEXICO**

All values presented in parts per million (mg/Kg)

SAMPLE ID	DATE	DEPTH (FT)	BENZENE	TOLUENE	ETHYL-BENZENE	TOTAL XYLENES	TOTAL BTEX	TPH GRO C6-C10	TPH DRO C10-C28	TPH MRO C28-C36	TPH (GRO+DRO)	TPH (GRO+DRO+MRO)	CHLORIDE
<b>Assessment Grid Composite Soil Samples</b>													
A-1/1'	4/14/2020	1'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.3	<46	<14.3	<60.3	<60
A-1/2'	4/14/2020	2'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.6	<48	<14.4	<62.4	<60
A-1/3'	4/14/2020	3'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.9	<49	<14.8	<63.8	64
A-1/4'	4/14/2020	4'	<0.024	<0.047	<0.047	<0.094	<0.212	<4.7	<9.7	<49	<14.4	<63.4	85
A-2/1'	4/14/2020	1'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.5	<47	<14.5	<61.5	65
A-2/2'	4/14/2020	2'	<0.024	<0.047	<0.047	<0.095	<0.213	<4.7	<10	<50	<14.7	<64.7	<60
A-2/3'	4/14/2020	3'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.8	<49	<14.6	<63.6	<60
A-2/4'	4/14/2020	4'	<0.024	<0.047	<0.047	<0.094	<0.212	<4.7	<9.3	<46	<14	<60	<60
A-3/1'	4/14/2020	1'	<0.023	<0.046	<0.046	<0.092	<0.207	<4.6	<9.1	<46	<13.7	<59.7	<60
A-3/2'	4/14/2020	2'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.3	<47	<14.2	<61.2	<60
A-3/3'	4/14/2020	3'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.6	<48	<14.4	<62.4	<60
A-3/4'	4/14/2020	4'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<9.2	<46	<14.2	<60.2	<59
A-4/1'	4/14/2020	1'	<0.024	<0.047	<0.047	<0.095	<0.213	<4.7	<10	<50	<14.7	<64.7	<61
A-4/2'	4/14/2020	2'	<0.024	<0.047	<0.047	<0.095	<0.213	<4.7	<9.2	<46	<13.9	<59.9	<60
A-4/3'	4/14/2020	3'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<9.1	<46	<14	<60	<60
A-4/4'	4/14/2020	4'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<9.1	<46	<14	<60	<60
B-1/1'	4/14/2020	1'	<0.024	<0.047	<0.047	<0.095	<0.213	<4.7	<9.1	<46	<13.8	<59.8	69
B-1/2'	4/14/2020	2'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.2	<46	<14.1	<60.1	<60
B-1/3'	4/14/2020	3'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.4	<47	<14.3	<61.3	76
B-1/4'	4/14/2020	4'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<9.5	<47	<14.4	<61.4	67
B-2/1'	4/14/2020	1'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.7	<48	<14.5	<62.5	<59
B-2/2'	4/14/2020	2'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<9.4	<47	<14.4	<61.4	<60
B-2/3'	4/14/2020	3'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.9	<50	<14.7	<64.7	65
B-2/4'	4/14/2020	4'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.3	<46	<14.3	<60.3	95
B-3/1'	4/14/2020	1'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<9.8	<49	<14.7	<63.7	<60
B-3/2'	4/14/2020	2'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<9.5	<47	<14.4	<61.4	<60
B-3/3'	4/14/2020	3'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.9	<49	<14.9	<63.9	<60
B-3/4'	4/14/2020	4'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.6	<48	<14.5	<62.5	<60
B-4/1'	4/14/2020	1'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.6	<48	<14.6	<62.6	69
B-4/2'	4/14/2020	2'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<9.9	<50	<14.9	<64.9	68
B-4/3'	4/14/2020	3'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<9.9	<49	<14.8	<63.8	74
B-4/4'	4/14/2020	4'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.7	<48	<14.5	<62.5	82
B-5/1'	4/14/2020	1'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.1	<46	<14	<60	<60
B-5/2'	4/14/2020	2'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.5	<47	<14.4	<61.4	76
B-5/3'	4/14/2020	3'	<0.024	<0.047	<0.047	<0.094	<0.212	<4.7	<9.4	<47	<14.1	<61.1	<60
B-5/4'	4/14/2020	4'	<0.023	<0.046	<0.046	<0.092	<0.207	<4.6	<9.3	<47	<13.9	<60.9	<60
C-1/1'	4/14/2020	1'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.9	<49	<14.8	<63.8	<60
C-1/2'	4/14/2020	2'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.8	<49	<14.7	<63.7	<60
C-1/3'	4/14/2020	3'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.8	<49	<14.6	<63.6	<61
C-1/4'	4/14/2020	4'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.6	<48	<14.5	<62.5	<60

NA = Not Analyzed  
 TPH = Total Petroleum Hydrocarbons  
 mg/Kg = Milligrams per Kilogram

**TABLE 1 - INITIAL ASSESSMENT SOIL BTEX (EPA 8260), TPH (EPA 8015) & CHLORIDE (EPA 300) ANALYTICAL DATA**  
**PENASCO COMPRESSOR FACILITY**  
**EDDY COUNTY, NEW MEXICO**

All values presented in parts per million (mg/Kg)

SAMPLE ID	DATE	DEPTH (FT)	BENZENE	TOLUENE	ETHYL-BENZENE	TOTAL XYLENES	TOTAL BTEX	TPH GRO C6-C10	TPH DRO C10-C28	TPH MRO C28-C36	TPH (GRO+DRO)	TPH (GRO+DRO+MRO)	CHLORIDE
C-2/1'	4/14/2020	1'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.4	<47	<14.4	<61.4	<60
C-2/2'	4/14/2020	2'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.8	<49	<14.7	<63.7	<60
C-2/3'	4/14/2020	3'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.7	<49	<14.6	<63.6	<60
C-2/4'	4/14/2020	4'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.8	<49	<14.7	<63.7	<60
C-3/1'	4/14/2020	1'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<9.6	<48	<14.6	<62.6	<60
C-3/2'	4/14/2020	2'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.6	<48	<14.5	<62.5	<60
C-3/3'	4/14/2020	3'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.5	<47	<14.5	<61.5	<59
C-3/4'	4/14/2020	4'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.6	<48	<14.6	<62.6	<60
C-4/1'	4/14/2020	1'	<0.023	<0.047	<0.047	<0.094	<0.211	<4.7	<9.8	<49	<14.5	<63.5	<60
C-4/2'	4/14/2020	2'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<8.9	<45	<13.9	<58.9	67
C-4/3'	4/14/2020	3'	<0.023	<0.047	<0.047	<0.093	<0.21	<4.7	<9.4	<47	<14.1	<61.1	62
C-4/4'	4/14/2020	4'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.7	<49	<14.6	<63.6	75
C-5/1'	4/14/2020	1'	<0.024	<0.047	<0.047	<0.094	<0.212	<4.7	<9.6	<48	<14.3	<62.3	75
C-5/2'	4/14/2020	2'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<9.6	<48	<14.5	<62.5	<60
C-5/3'	4/14/2020	3'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.2	<46	<14.2	<60.2	<60
C-5/4'	4/14/2020	4'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<8.9	<44	<13.8	<57.8	<60
D-1/1'	4/15/2020	1'	<0.024	<0.048	<0.048	<0.095	<0.215	<4.8	<9.5	<48	<14.3	<62.3	<59
D-1/2'	4/15/2020	2'	<0.024	<0.047	<0.047	<0.095	<0.213	<4.7	<9.6	<48	<14.3	<62.3	<60
D-1/3'	4/15/2020	3'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.9	<49	<14.9	<63.9	<60
D-1/4'	4/15/2020	4'	<0.024	<0.048	<0.048	<0.095	<0.215	<4.8	<9.5	<47	<14.3	<61.3	<60
D-2/1'	4/14/2020	1'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.4	<47	<14.2	<61.3	<60
D-2/2'	4/14/2020	2'	<0.024	<0.048	<0.048	<0.095	<0.215	<4.8	<9.5	<48	<14.3	<62.3	<60
D-2/3'	4/14/2020	3'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.9	<50	<14.8	<64.8	<60
D-2/4'	4/14/2020	4'	<0.023	<0.047	<0.047	<0.094	<0.211	<4.7	<9.7	<48	<14.4	<62.4	110
D-3/1'	4/14/2020	1'	<0.024	<0.047	<0.047	<0.095	<0.213	<4.7	<10	<50	<14.7	<64.7	96
D-3/2'	4/14/2020	2'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.1	<46	<13.9	<59.9	100
D-3/3'	4/14/2020	3'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.8	<49	<14.7	<63.7	85
D-3/4'	4/14/2020	4'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.4	<47	<14.4	<61.4	96
D-4/1'	4/14/2020	1'	<0.023	<0.046	<0.046	<0.093	<0.208	<4.6	<9.2	<46	<13.8	<59.8	<60
D-4/2'	4/14/2020	2'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.4	<47	<14.2	<61.2	<60
D-4/3'	4/14/2020	3'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<9.6	<48	<14.6	<62.6	79
D-4/4'	4/14/2020	4'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<8.6	<43	<13.4	<56.4	130
D-5/1'	4/14/2020	1'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<9.8	<49	<14.7	<63.7	68
D-5/2'	4/14/2020	2'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<9.8	<49	<14.8	<63.8	65
D-5/3'	4/14/2020	3'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.5	<47	<14.4	<61.4	100
D-5/4'	4/14/2020	4'	<0.024	<0.047	<0.047	<0.094	<0.212	<4.7	<8.4	<42	<13.1	<55.1	<60
E-1/1'	4/15/2020	1'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.9	<50	<14.8	<64.8	<60
E-1/2'	4/15/2020	2'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<9.5	<48	<14.4	<62.4	68
E-1/3'	4/15/2020	3'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<9.6	<48	<14.5	<62.5	<60
E-1/4'	4/15/2020	4'	<0.023	<0.047	<0.047	<0.094	<0.211	<4.7	<9.5	<47	<14.2	<61.2	74

NA = Not Analyzed  
 TPH = Total Petroleum Hydrocarbons  
 mg/Kg = Milligrams per Kilogram

**TABLE 1 - INITIAL ASSESSMENT SOIL BTEX (EPA 8260), TPH (EPA 8015) & CHLORIDE (EPA 300) ANALYTICAL DATA**  
**PENASCO COMPRESSOR FACILITY**  
**EDDY COUNTY, NEW MEXICO**

All values presented in parts per million (mg/Kg)

SAMPLE ID	DATE	DEPTH (FT)	BENZENE	TOLUENE	ETHYL-BENZENE	TOTAL XYLENES	TOTAL BTEX	TPH GRO C6-C10	TPH DRO C10-C28	TPH MRO C28-C36	TPH (GRO+DRO)	TPH (GRO+DRO+MRO)	CHLORIDE
E-2/1'	4/15/2020	1'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.5	<47	<14.4	<61.4	100
E-2/2'	4/15/2020	2'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<9.7	<48	<14.7	<62.7	93
E-2/3'	4/15/2020	3'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.5	<48	<14.4	<62.4	100
E-2/4'	4/15/2020	4'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<9.8	<49	<14.8	<63.8	97
E-3/1'	4/15/2020	1'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.7	<49	<14.5	<63.5	220
E-3/2'	4/15/2020	2'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<9.4	<47	<14.3	<61.3	130
E-3/3'	4/15/2020	3'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.9	<49	<14.8	<63.8	120
E-3/4'	4/15/2020	4'	<0.024	<0.047	<0.047	<0.095	<0.213	<4.7	<9.8	<49	<14.5	<63.5	120
E-4/1'	4/15/2020	1'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<9.6	<48	<14.6	<62.6	80
E-4/2'	4/15/2020	2'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.5	150	<14.5	150	<60
E-4/3'	4/15/2020	3'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.9	<49	<14.7	<63.7	<60
E-4/4'	4/15/2020	4'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<10	<50	<14.8	<64.8	<60
E-5/1'	4/15/2020	1'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.9	<50	<14.9	<64.9	96
E-5/2'	4/15/2020	2'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<8.8	<44	<13.7	<57.7	170
E-5/3'	4/15/2020	3'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<9.6	<48	<14.5	<62.5	180
E-5/4'	4/15/2020	4'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.7	<48	<14.5	<62.5	190
F-1/1'	4/15/2020	1'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.7	<48	<14.6	<62.6	<60
F-1/2'	4/15/2020	2'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.9	<49	<14.9	<63.9	<60
F-1/3'	4/15/2020	3'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.6	<48	<14.4	<62.4	<60
F-1/4'	4/15/2020	4'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<9.3	<46	<14.2	<60.2	<60
F-2/1'	4/15/2020	1'	<0.023	<0.047	<0.047	<0.094	<0.211	<4.7	<9.9	<49	<14.6	<63.6	95
F-2/2'	4/15/2020	2'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.3	<46	<14.1	<60.1	69
F-2/3'	4/15/2020	3'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.4	<47	<14.4	<61.4	<60
F-2/4'	4/15/2020	4'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.1	<45	<14	<59	<60
F-3/1'	4/15/2020	1'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.3	<47	<14.1	<61.1	120
F-3/2'	4/15/2020	2'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<10	<50	<14.8	<64.8	68
F-3/3'	4/15/2020	3'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.1	<46	<14	<60	71
F-3/4'	4/15/2020	4'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.6	<48	<14.5	<62.5	66
F-4/1'	4/15/2020	1'	<0.024	<0.048	<0.048	<0.095	<0.215	<4.8	<9.8	<49	<14.6	<63.6	73
F-4/2'	4/15/2020	2'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.6	<48	<14.4	<62.4	62
F-4/3'	4/15/2020	3'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.3	<47	<14.2	<61.2	71
F-4/4'	4/15/2020	4'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.2	<46	<14.1	<60.1	62
G-1/1'	4/15/2020	1'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.9	<49	<14.8	<63.8	<60
G-1/2'	4/15/2020	2'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.5	<47	<14.3	<61.3	77
G-1/3'	4/15/2020	3'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.3	<47	<14.1	<61.1	77
G-1/4'	4/15/2020	4'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.4	<47	<14.2	<61.2	77
G-2/1'	4/15/2020	1'	<0.024	<0.048	<0.048	<0.095	<0.215	<4.8	<9.1	<46	<13.9	<59.9	73
G-2/2'	4/15/2020	2'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.6	<48	<14.4	<62.4	310
G-2/3'	4/15/2020	3'	<0.023	<0.046	<0.046	<0.092	<0.207	<4.6	<9.0	<45	<13.6	<58.6	430
G-2/4'	4/15/2020	4'	<0.023	<0.047	<0.047	<0.093	<0.21	<4.7	<10	<50	<14.7	<64.7	450

NA = Not Analyzed  
TPH = Total Petroleum Hydrocarbons  
mg/Kg = Milligrams per Kilogram

**TABLE 1 - INITIAL ASSESSMENT SOIL BTEX (EPA 8260), TPH (EPA 8015) & CHLORIDE (EPA 300) ANALYTICAL DATA**  
**PENASCO COMPRESSOR FACILITY**  
**EDDY COUNTY, NEW MEXICO**

All values presented in parts per million (mg/Kg)

SAMPLE ID	DATE	DEPTH (FT)	BENZENE	TOLUENE	ETHYL-BENZENE	TOTAL XYLENES	TOTAL BTEX	TPH GRO C6-C10	TPH DRO C10-C28	TPH MRO C28-C36	TPH (GRO+DRO)	TPH (GRO+DRO+MRO)	CHLORIDE
G-3/1'	4/15/2020	1'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.8	<49	<14.7	<63.7	240
G-3/2'	4/15/2020	2'	<0.024	<0.048	<0.048	<0.095	<0.215	<4.8	<9.6	<48	<14.4	<62.4	380
G-3/3'	4/15/2020	3'	<0.024	<0.047	<0.047	<0.094	<0.212	<4.7	<9.9	<49	<14.6	<63.6	330
G-3/4'	4/15/2020	4'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.4	<47	<14.3	<61.3	850
H-5/1'	4/15/2020	1'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.3	<47	<14.1	<61.1	520
H-5/2'	4/15/2020	2'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	54	86	54	<b>140</b>	<b>780</b>
H-5/3'	4/15/2020	3'	<0.024	<0.047	<0.047	<0.095	<0.213	<4.7	<9.4	<47	<14.1	<61.1	<b>820</b>
H-5/4'	4/15/2020	4'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.6	<48	<14.4	<62.4	640
<b>19.15.29.12 NMAC Table 1 Closure Criteria for Soils Impacted by a Release (GW &gt;100')</b>			<b>10</b>	---	---	---	<b>50</b>	---	---	---	<b>1,000</b>	<b>2,500</b>	<b>20,000</b>
<b>19.15.29.13 NMAC Reclamation Criteria (0'-4' Soils Only)</b>			<b>10<sup>3</sup></b>				<b>50<sup>3</sup></b>					<b>100<sup>3</sup></b>	<b>600</b>

## Notes:

- Results exceeding the Table 1 Closure Criteria are presented in bold type and are highlighted yellow.
- Results exceeding the NMAC Restoration, Reclamation and re-vegetation chloride concentration requirements are presented in bold red type.
- Value derived from the State of New Mexico Energy, Minerals and Natural Resources Department document *Procedures for the Implementation of the Spill Rule* (19.15.29 NMAC) dated September 6, 2019.
- NA - Not Analyzed

**TABLE 2 - AOC-1 ASSESSMENT SOIL BTEX (EPA 8260), TPH (EPA 8015) & CHLORIDE (EPA 300) ANALYTICAL DATA**  
**PENASCO COMPRESSOR FACILITY**  
**EDDY COUNTY, NEW MEXICO**

All values presented in parts per million (mg/Kg)

SAMPLE ID	DATE	DEPTH (FT)	BENZENE	TOLUENE	ETHYL-BENZENE	TOTAL XYLENES	TOTAL BTEX	TPH GRO C6-C10	TPH DRO C10-C28	TPH MRO C28-C36	TPH (GRO+DRO)	TPH (GRO+DRO+MRO)	CHLORIDE
<i>April 2020 - Initial Site Assessment Soil Samples</i>													
AOC-1-S/1'	4/13/2020	1'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.7	230	<14.6	<b>230</b>	<60
AOC-1-S/2'	4/13/2020	2'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.1	<46	<13.9	<59.9	<60
AOC-1-S/3'	4/13/2020	3'	<0.024	<0.047	<0.047	<0.094	<0.212	<4.7	<9.4	<47	<14.1	<61.1	<60
AOC-1-S/4'	4/13/2020	4'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<9.6	<48	<14.6	<62.6	<60
AOC-1-M/1'	4/13/2020	1'	<2.3	23	7.5	45	<b>75.50</b>	1,300	78	130	<b>1,378</b>	<b>1,508</b>	<60
AOC-1-M/2'	4/13/2020	2'	0.76	29	9	53	<b>91.76</b>	1,800	66	84	<b>1,866</b>	<b>1,950</b>	<60
AOC-1-M/3'	4/13/2020	3'	0.17	7.3	3.1	20	30.57	590	24	<49	614	<b>614</b>	<60
AOC-1-M/4'	4/13/2020	4'	0.28	7.3	2.3	14	23.88	450	<8.3	<41	450	450	<60
AOC-1-N/1'	4/13/2020	1'	0.13	0.22	0.36	4	4.71	220	250	390	470	<b>860</b>	<60
AOC-1-N/2'	4/13/2020	2'	1.9	7.4	5.1	59	<b>73.4</b>	2,400	810	280	<b>3,210</b>	<b>3,490</b>	<60
AOC-1-N/3'	4/13/2020	3'	<0.12	0.47	0.45	5.7	6.62	340	190	110	530	<b>640</b>	<61
AOC-1-N/4'	4/13/2020	4'	<0.12	0.21	0.21	2.5	2.92	190	130	62	320	382	<60
<i>May 2020 - Additional Assessment Soil Samples</i>													
AOC-1-N(A)/1'	5/21/2020	1'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<8.4	<42	<13.4	<55.4	NA
AOC-1-N(A)/2'	5/21/2020	2'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<10	<50	<15	<65	NA
AOC-1-N(A)/3'	5/21/2020	3'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.7	<48	<14.6	<62.6	NA
AOC-1-N(A)/4'	5/21/2020	4'	<0.024	<0.049	<0.049	<0.098	<0.220	<4.9	<9.7	<49	<14.6	<63.6	NA
AOC-1-NE/1'	5/18/2020	1'	<0.024	<0.047	<0.047	<0.095	<0.213	<4.7	<9.4	<47	<14.1	<61.1	NA
AOC-1-NE/2'	5/18/2020	2'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.7	<48	<14.7	<62.7	NA
AOC-1-NE/3'	5/18/2020	3'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.7	<49	<14.6	<63.6	NA
AOC-1-NE/4'	5/18/2020	4'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<8.9	<44	<13.7	<57.7	NA
AOC-1-NW/1'	5/18/2020	1'	<0.024	<0.049	<0.049	<0.097	<0.122	<4.9	<9.7	<48	<14.6	<62.6	NA
AOC-1-NW/2'	5/18/2020	2'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.2	<46	<14.1	<60.1	NA
AOC-1-NW/3'	5/18/2020	3'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.4	<47	<14.2	<61.2	NA
AOC-1-NW/4'	5/18/2020	4'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<9.3	<46	<14.3	<60.3	NA
AOC-1-ME/1'	5/18/2020	1'	<0.12	<0.24	<0.24	<0.48	<1.08	<24	11	<47	11	11	NA
AOC-1-ME/2'	5/18/2020	2'	<0.12	<0.24	<0.24	<0.48	<1.08	<24	<9.7	49	<33.7	49	NA
AOC-1-ME/3'	5/18/2020	3'	<0.023	<0.046	<0.046	<0.092	<0.207	<4.6	<9.8	<49	<14.4	<63.4	NA
AOC-1-ME/4'	5/18/2020	4'	<0.12	<0.25	<0.25	<0.49	<1.11	<25	41	86	41	127	NA
AOC-1-MW/1'	5/18/2020	1'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.5	<48	<14.3	<62.3	NA
AOC-1-MW/2'	5/18/2020	2'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.7	<49	<14.6	<63.6	NA
AOC-1-MW/3'	5/18/2020	3'	<0.025	<0.049	<0.049	<0.098	<0.22	<4.9	<9.4	<47	<14.3	<61.3	NA
AOC-1-MW/4'	5/18/2020	4'	<0.025	<0.049	<0.049	<0.098	<0.22	<4.9	<9.7	<49	<14.6	<63.6	NA
AOC-1-SE/1'	5/18/2020	1'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.5	<47	<14.5	<61.5	NA
AOC-1-SE/2'	5/18/2020	2'	<0.024	<0.048	<0.048	<0.095	<0.215	<4.8	<10	<50	<14.8	<64.8	NA
AOC-1-SE/3'	5/18/2020	3'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.4	<47	<14.3	<61.3	NA
AOC-1-SE/4'	5/18/2020	4'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.2	<46	<14.1	<60.1	NA
AOC-1-SW/1'	5/18/2020	1'	<0.024	<0.048	<0.048	<0.095	<0.215	<4.8	<9.8	<49	<14.6	<63.6	NA
AOC-1-SW/2'	5/18/2020	2'	<0.023	<0.047	<0.047	<0.094	<0.211	<4.7	<9.2	<46	<13.9	<59.9	NA
AOC-1-SW/3'	5/18/2020	3'	<0.023	<0.047	<0.047	<0.094	<0.211	<4.7	<9.7	<48	<14.4	<62.4	NA
AOC-1-SW/4'	5/18/2020	4'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.3	<47	<14.1	<61.1	NA
AOC-1-S(A)/1'	5/18/2020	1'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.9	<49	<14.8	<63.8	NA
AOC-1-S(A)/2'	5/18/2020	2'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<9.6	<48	<14.5	<62.5	NA
AOC-1-S(A)/3'	5/18/2020	3'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.2	<46	<14.2	<60.2	NA
AOC-1-S(A)/4'	5/18/2020	4'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.2	<46	<14.2	<60.2	NA
<b>19.15.29.12 NMAC Table 1 Closure Criteria for Soils Impacted by a Release (GW &gt;100')</b>													
			<b>10</b>	---	---	---	<b>50</b>	---	---	---	<b>1,000</b>	<b>2,500</b>	<b>20,000</b>
<b>19.15.29.13 NMAC Reclamation Criteria (0'-4' Soils Only)</b>			<b>10<sup>3</sup></b>				<b>50<sup>3</sup></b>				<b>100<sup>3</sup></b>	<b>600</b>	

## Notes:

- Results exceeding the Table 1 Closure Criteria are presented in bold type and are highlighted yellow.
- Results exceeding the NMAC Restoration, Reclamation and re-vegetation chloride concentration requirements are presented in bold red type.
- Value derived from the State of New Mexico Energy, Minerals and Natural Resources Department document *Procedures for the Implementation of the Spill Rule* (19.15.29 NMAC) dated September 6, 2019.
- NA - Not Analyzed

**TABLE 3 - AOC-1 EXCAVATION AREA SOIL BTEX (EPA 8260), TPH (EPA 8015) & CHLORIDE (EPA 300) ANALYTICAL DATA**  
**EOG RESOURCES, INC.**  
**PENASCO COMPRESSOR FACILITY**  
**EDDY COUNTY, NEW MEXICO**

All values presented in parts per million (mg/Kg)

SAMPLE ID	DATE	DEPTH (FT)	BENZENE	TOLUENE	ETHYL-BENZENE	TOTAL XYLENES	TOTAL BTEX	TPH GRO C6-C10	TPH DRO C10-C28	TPH MRO C28-C36	TPH (GRO+DRO)	TPH (GRO+DRO+MRO)	CHLORIDE
AOC-1 Excavation Soil Samples													
1-SW-W	8/5/2020	0-5'	<0.12	<0.25	<0.25	<0.50	<1.12	<25	<9.8	64	<34.8	64	77
1-SW-E	8/5/2020	0-5'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<9.6	<48	<14.5	<62.5	<60
1-WW-N	8/5/2020	0-5'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<10	<50	<14.8	<64.8	65
1-WW-M	8/5/2020	0-5'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<9.7	<49	<14.6	<63.6	85
1-WW-S	8/5/2020	0-5'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<9.6	<48	<14.5	<62.5	63
1-NW-W	8/5/2020	0-5'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.2	<46	<14.1	<60.1	<60
1-NW-E	8/5/2020	0-5'	<0.12	<0.24	<0.24	<0.49	<1.09	<24	<9.6	<48	<33.6	<81.6	88
1-EW-N	8/5/2020	0-5'	<0.12	<0.25	<0.25	<0.50	<1.12	<25	<9.5	<47	<34.5	<81.5	83
1-EW-M	8/5/2020	0-5'	<0.050	<0.099	<0.099	<0.20	<0.488	<9.9	<9.7	<48	<19.6	<67.6	<60
1-EW-S	8/5/2020	0-5'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.6	<48	<14.5	<62.5	<60
1-EXB-1	8/5/2020	5'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.8	<49	<14.7	<63.7	<60
1-EXB-2	8/5/2020	5'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<9.8	<49	<14.8	<63.8	<60
1-EXB-3	8/5/2020	5'	<b>0.52</b>	<b>7.3</b>	<b>4.3</b>	<b>44</b>	<b>53.12</b>	<b>1,400</b>	<b>67</b>	<b>&lt;48</b>	<b>1,467</b>	<b>1,467</b>	<b>&lt;60</b>
1-EXB-3A	8/17/2020	6.25'	<0.025	<0.050	<0.050	0.42	0.42	6.8	51	<48	57.8	57.8	<60
1-EXB-4	8/5/2020	5'	<0.12	<0.25	<0.25	7.3	7.3	430	100	<47	530	530	<61
1-EXB-5	8/5/2020	5'	<0.049	<0.097	<0.097	<0.19	<0.433	<9.7	<8.8	<44	<18.5	<62.5	<60
1-EXB-6	8/5/2020	5'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.1	<46	<14.1	<60.1	72
1-EXB-7	8/5/2020	5'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<9.9	<49	<14.9	<63.9	<60
1-EXB-8	8/5/2020	5'	<0.12	<0.25	<0.25	0.84	0.84	62	41	56	103	159	<60
1-EXB-9	8/5/2020	5'	<0.12	<0.25	0.94	8.2	9.14	290	29	<49	319	319	<60
1-EXB-10	8/5/2020	5'	<0.048	<0.097	<0.097	<0.19	<0.432	14	30	<44	44	44	<60
1-EXB-11	8/5/2020	5'	<0.012	<0.025	<0.025	<0.049	<0.111	<2.5	<9.6	<48	<12.1	<60.1	61
1-EXB-12	8/5/2020	5'	<0.12	<0.25	<0.25	<0.50	<1.12	<25	18	75	18	93	<60
1-EXB-13	8/5/2020	5'	<0.12	<0.25	<0.25	<0.49	<1.11	<25	10	<50	10	10	<60
1-EXB-14	8/5/2020	5'	<0.12	<0.25	<0.25	<0.49	<1.11	<25	<9.3	<47	<34.3	<81.3	<60
1-EXB-15	8/5/2020	5'	<0.12	<0.25	<0.25	<0.50	<1.12	<25	<9.7	<48	<34.7	<82.7	<60
1-EXB-16	8/5/2020	5'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.4	<47	<14.3	<61.3	70
1-EXB-17	8/5/2020	5'	<0.12	<0.25	<0.25	<0.49	<1.11	<25	19	72	19	91	<60
1-EXB-18	8/5/2020	5'	<0.12	<0.25	<0.25	<0.49	<1.11	<25	<9.2	<46	<34.2	<80.2	<60
1-EXB-19	8/5/2020	5'	<0.12	<0.25	<0.25	<0.50	<1.12	<25	<9.2	<46	<34.2	<80.2	<60
1-EXB-20	8/5/2020	5'	<0.12	<0.25	<0.25	2.2	2.2	31	23	69	54	123	<60
1-EXB-21	8/5/2020	5'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.1	<45	<14.1	<59.1	<61
1-EXB-22	8/5/2020	5'	<0.12	<0.24	<0.24	<0.49	<1.09	<24	<9.9	<49	<33.9	<82.9	<60
1-EXB-23	8/5/2020	5'	<0.12	<0.25	<0.25	<0.50	<1.12	<25	<9.9	<50	<34.9	<84.9	<60
1-EXB-24	8/5/2020	5'	<0.12	<0.25	<0.25	<0.50	<1.12	<25	<9.8	<49	<34.8	<83.8	<60
1-EXB-25	8/5/2020	5'	<0.12	<0.25	<0.25	<0.49	<1.11	<25	<9.4	<47	<34.4	<81.4	<60

<b>19.15.29.12 NMAC Table 1 Closure Criteria for Soils Impacted by a Release (GW &gt;100')</b>	<b>10</b>	---	---	---	<b>50</b>	---	---	---	<b>1,000</b>	<b>2,500</b>	<b>20,000</b>
<b>19.15.29.13 NMAC Reclamation Criteria (0'-4' Soils Only)</b>	<b>10<sup>3</sup></b>				<b>50<sup>3</sup></b>					<b>100<sup>3</sup></b>	<b>600</b>

## Notes:

- Results exceeding the Table 1 Closure Criteria are presented in bold type and are highlighted yellow.
- Results exceeding the NMAC Restoration, Reclamation and re-vegetation chloride concentration requirements are presented in bold red type.
- Value derived from the State of New Mexico Energy, Minerals and Natural Resources Department document *Procedures for the Implementation of the Spill Rule* (19.15.29 NMAC) dated September 6, 2019.
- NA - Not Analyzed
- Strikethrough indicates sample area has been excavated and/or remediated

**TABLE 4 - AOC-7 ASSESSMENT SOIL BTEX (EPA 8260), TPH (EPA 8015) & CHLORIDE (EPA 300) ANALYTICAL DATA**  
**PENASCO COMPRESSOR FACILITY**  
**EDDY COUNTY, NEW MEXICO**

All values presented in parts per million (mg/Kg)

SAMPLE ID	DATE	DEPTH (FT)	BENZENE	TOLUENE	ETHYL-BENZENE	TOTAL XYLENES	TOTAL BTEX	TPH GRO C6-C10	TPH DRO C10-C28	TPH MRO C28-C36	TPH (GRO+DRO)	TPH (GRO+DRO+MRO)	CHLORIDE
<i>April 2020 - Initial Site Assessment Soil Samples</i>													
AOC-7-E/1'	4/13/2020	1'	<0.023	<0.047	<0.047	<0.093	<0.21	<4.7	9.8	240	9.8	249.8	150
AOC-7-E/2'	4/13/2020	2'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.3	<47	<14.1	<61.1	140
AOC-7-E/3'	4/13/2020	3'	<0.023	<0.047	<0.047	<0.094	<0.211	<4.7	27	410	27	437	140
AOC-7-E/4'	4/13/2020	4'	<0.049	<0.097	<0.097	<0.19	<0.433	<9.7	<100	4,100	<109.7	4,100	85
AOC-7-W/1'	4/13/2020	1'	<0.024	<0.047	<0.047	<0.095	<0.213	<4.7	<9.3	<47	<14	<61	<60
AOC-7-W/2'	4/13/2020	2'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.3	<46	<14.2	<60.2	<60
AOC-7-W/3'	4/13/2020	3'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.8	<49	<14.7	<63.7	<60
AOC-7-W/4'	4/13/2020	4'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.8	<49	<14.6	<63.6	<60
<i>May 2020 - Additional Assessment Soil Samples</i>													
AOC-7-E/5'	5/18/2020	5'	NA	NA	NA	NA	NA	<4.7	<8.7	<44	<13.4	<57.4	NA
AOC-7-E/6'	5/18/2020	6'	NA	NA	NA	NA	NA	<4.8	<9.0	<45	<13.8	<58.8	NA
AOC-7-E/7'	5/18/2020	7'	NA	NA	NA	NA	NA	<4.7	<9.6	<48	<14.3	<62.3	NA
AOC-7-E/8	5/18/2020	8'	NA	NA	NA	NA	NA	<4.6	<9.6	<48	<14.2	<62.2	NA
AOC-7-E(N)/1'	5/18/2020	1'	NA	NA	NA	NA	NA	<4.9	<9.9	<49	<14.8	<63.8	NA
AOC-7-E(N)/2'	5/18/2020	2'	NA	NA	NA	NA	NA	<4.9	<9.3	<47	<14.2	<61.2	NA
AOC-7-E(N)/3'	5/18/2020	3'	NA	NA	NA	NA	NA	<4.8	<10	<50	<14.8	<64.8	NA
AOC-7-E(N)/4'	5/18/2020	4'	NA	NA	NA	NA	NA	<5.0	<9.7	<48	<14.7	<62.7	NA
AOC-7-E(S)/1'	5/18/2020	1'	NA	NA	NA	NA	NA	<4.8	<9.5	<47	<14.3	<61.3	NA
AOC-7-E(S)/2'	5/18/2020	2'	NA	NA	NA	NA	NA	<5.0	<9.5	<48	<14.5	<62.5	NA
AOC-7-E(S)/3'	5/18/2020	3'	NA	NA	NA	NA	NA	<4.8	<9.8	<49	<14.6	<63.6	NA
AOC-7-E(S)/4'	5/18/2020	4'	NA	NA	NA	NA	NA	<4.9	<9.9	<49	<14.8	<63.8	NA
AOC-7-E(E)/1'	5/18/2020	1'	NA	NA	NA	NA	NA	<4.7	<9.3	74	<14	74	NA
AOC-7-E(E)/2'	5/18/2020	2'	NA	NA	NA	NA	NA	<4.8	<9.5	<47	<14.3	<61.3	NA
AOC-7-E(E)/3'	5/18/2020	3'	NA	NA	NA	NA	NA	<4.7	<9.7	<48	<14.4	<62.4	NA
AOC-7-E(E)/4'	5/18/2020	4'	NA	NA	NA	NA	NA	<4.6	<9.4	<47	<14	<51	NA
<b>19.15.29.12 NMAC Table 1 Closure Criteria for Soils Impacted by a Release (GW &gt;100')</b>			<b>10</b>	---	---	---	<b>50</b>	---	---	---	<b>1,000</b>	<b>2,500</b>	<b>20,000</b>
<b>19.15.29.13 NMAC Reclamation Criteria (0'-4' Soils Only)</b>			<b>10<sup>3</sup></b>				<b>50<sup>3</sup></b>					<b>100<sup>3</sup></b>	<b>600</b>

## Notes:

- Results exceeding the Table 1 Closure Criteria are presented in bold type and are highlighted yellow.
- Results exceeding the NMAC Restoration, Reclamation and re-vegetation chloride concentration requirements are presented in bold red type.
- Value derived from the State of New Mexico Energy, Minerals and Natural Resources Department document *Procedures for the Implementation of the Spill Rule* (19.15.29 NMAC) dated September 6, 2019.
- NA - Not Analyzed



**TABLE 5 - AOC-7 EXCAVATION AREA SOIL BTEX (EPA 8260), TPH (EPA 8015) & CHLORIDE (EPA 300) ANALYTICAL  
DATA PENASCO COMPRESSOR FACILITY  
EDDY COUNTY, NEW MEXICO**

All values presented in parts per million (mg/Kg)

SAMPLE ID	DATE	DEPTH (FT)	BENZENE	TOLUENE	ETHYL-BENZENE	TOTAL XYLENES	TOTAL BTEX	TPH GRO C6-C10	TPH DRO C10-C28	TPH MRO C28-C36	TPH (GRO+DRO)	TPH (GRO+DRO+MRO)	CHLORIDE
AOC-7 Excavation Soil Samples													
7-NW-E	8/5/2020	0-5'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.8	80	<14.8	80	<60
7-NW-W	8/5/2020	0-5'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<10	<51	<15.0	<66.0	<60
7-WW	8/5/2020	0-5'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.5	<48	<14.5	<62.5	<61
7-SW-W	8/5/2020	0-5'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.4	<47	<14.2	<61.2	<60
7-SW-E	8/5/2020	0-5'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<10	<51	<14.9	<65.9	<60
7-EW	8/5/2020	0-5'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	49	479	49	489	<59
7-EW(A)	8/17/2020	0-7'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.6	<48	<14.6	<62.6	<60
7-EXB-1	8/5/2020	5'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.7	810	<14.6	810	<60
7-EXB-2	8/5/2020	5'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	159	5,400	159	5,550	<60
7-EXB-2(N)	8/17/2020	7'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.3	5,100	<97.9	5,100	<59
7-EXB-2(N.A)	8/25/2020	9'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<8.9	<45	<13.8	<58.8	<60
7-EXB-2(S)	8/17/2020	7'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<8.8	<44	<13.7	<57.7	<60
7-EXB-3	8/5/2020	5'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<9.9	<50	<14.9	<64.9	<60
7-EXB-4	8/5/2020	5'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.0	88	<13.9	88	<60
7-EXB-5	8/5/2020	5'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.7	<48	<14.6	<62.6	<60
7-EXB-6	8/5/2020	5'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.3	80	<14.2	80	<60
7-EXB-7	8/5/2020	5'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.3	<47	<14.3	<61.3	<60
7-EXB-8	8/5/2020	5'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<9.7	<49	<14.6	<63.6	<60
7-EXB-G.1	8/17/2020	7'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<1,900	52,000	<1,905	52,000	<60
19.15.29.12 NMAC Table 1 Closure Criteria for Soils Impacted by a Release (GW >100')													
			10	---	---	---	50	---	---	---	1,000	2,500	20,000
19.15.29.13 NMAC Reclamation Criteria (0'-4' Soils Only)			10 <sup>3</sup>				50 <sup>3</sup>					100 <sup>3</sup>	600
Notes:													
1. Results exceeding the Table 1 Closure Criteria are presented in bold type and are highlighted yellow.													
2. Results exceeding the NMAC Restoration, Reclamation and re-vegetation chloride concentration requirements are presented in bold red type.													
3. Value derived from the State of New Mexico Energy, Minerals and Natural Resources Department document <i>Procedures for the Implementation of the Spill Rule</i> (19.15.29 NMAC) dated September 6, 2019.													
4. NA - Not Analyzed													
5. Strikethrough indicates sample area has been excavated and/or remediated													

NA = Not Analyzed  
TPH = Total Petroleum Hydrocarbons  
mg/Kg = Milligrams per Kilogram

**TABLE 6 - AOC-4 AREA COMPREHENSIVE SOIL BTEX (EPA 8260), TPH (EPA 8015) & CHLORIDE (EPA 300) ANALYTICAL DATA**  
**PENASCO COMPRESSOR FACILITY**  
**EDDY COUNTY, NEW MEXICO**

All values presented in parts per million (mg/Kg)

SAMPLE ID	DATE	DEPTH (FT)	BENZENE	TOLUENE	ETHYL-BENZENE	TOTAL XYLENES	TOTAL BTEX	TPH GRO C6-C10	TPH DRO C10-C28	TPH MRO C28-C36	TPH (GRO+DRO)	TPH (GRO+DRO+MRO)	CHLORIDE
<b>April 2020 - Initial Site Assessment Soil Samples</b>													
AOC-4-1/1'	4/13/2020	1'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.8	<49	<14.8	<63.8	280
AOC-4-1/2'	4/13/2020	2'	<0.023	<0.046	<0.046	<0.093	<0.208	<4.6	<9.8	<49	<14.4	<63.4	260
AOC-4-1/3'	4/13/2020	3'	<0.024	<0.047	<0.047	<0.094	<0.212	<4.7	<9.4	<47	<14.1	<61.1	180
AOC-4-1/4'	4/13/2020	4'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<10	<50	<14.8	<64.8	150
AOC-4-2/1'	4/13/2020	1'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<10	<50	<14.8	<64.8	<60
AOC-4-2/2'	4/13/2020	2'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<9.9	<49	<14.8	<63.8	<60
AOC-4-2/3'	4/13/2020	3'	<0.023	<0.046	<0.046	<0.092	<0.207	<4.6	<9.9	<49	<14.5	<63.5	290
AOC-4-2/4'	4/13/2020	4'	<0.024	<0.047	<0.047	<0.095	<0.213	<4.7	<9.7	<49	<14.4	<63.4	310
AOC-4-3/1'	4/13/2020	1'	<0.023	<0.047	<0.047	<0.093	<0.21	<4.7	<9.9	<50	<14.6	<64.6	<60
AOC-4-3/2'	4/13/2020	2'	<0.024	<0.047	<0.047	<0.094	<0.212	<4.7	<9.8	<49	<14.5	<63.5	<60
AOC-4-3/3'	4/13/2020	3'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.2	<46	<14	<60	<59
AOC-4-3/4'	4/13/2020	4'	<0.023	<0.047	<0.047	<0.093	<0.21	<4.7	<8.8	<44	<13.5	<57.5	<61
AOC-4-4/1'	4/13/2020	1'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.9	<49	<14.8	<63.8	240
AOC-4-4/2'	4/13/2020	2'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.9	<50	<14.8	<64.8	340
AOC-4-4/3'	4/13/2020	3'	<0.024	<0.048	<0.048	<0.095	<0.215	<4.8	<9.3	<47	<14.1	<61.1	320
AOC-4-4/4'	4/13/2020	4'	<0.023	<0.046	<0.046	<0.093	<0.208	<4.6	<9.4	<47	<14	<61	190
AOC-4-5/1'	4/13/2020	1'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.9	<50	<14.9	<64.9	<60
AOC-4-5/2'	4/13/2020	2'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.8	<49	<14.7	<63.7	<60
AOC-4-5/3'	4/13/2020	3'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.2	<46	<14.1	<60.1	<60
AOC-4-5/4'	4/13/2020	4'	<0.023	<0.047	<0.047	<0.093	<0.21	<4.7	<9.4	<47	<14.1	<61.1	<61
AOC-4-6/1'	4/13/2020	1'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.7	<48	<14.5	<62.5	510
AOC-4-6/2'	4/13/2020	2'	<0.024	<0.047	<0.047	<0.095	<0.213	<4.7	<9.4	<47	<14.1	<61.1	840
AOC-4-6/3'	4/13/2020	3'	<0.023	<0.047	<0.047	<0.093	<0.21	<4.7	<9.2	<46	<13.9	<59.9	580
AOC-4-6/4'	4/13/2020	4'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.4	<47	<14.4	<61.4	470
AOC-4-7/1'	4/13/2020	1'	<0.12	<0.24	<0.24	<0.47	<1.07	<24	4,200	2,900	4,200	7,100	130
AOC-4-7/2'	4/13/2020	2'	<0.12	<0.24	<0.24	<0.48	<1.08	<24	3,800	3,100	3,800	6,900	96
AOC-4-7/3'	4/13/2020	3'	<1.2	<2.4	13	21	34	800	8,200	3,200	9,000	12,200	100
AOC-4-7/4'	4/13/2020	4'	<0.47	<0.93	13	32	45	970	5,700	2,200	6,670	8,870	66
AOC-4-8/1'	4/13/2020	1'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.1	<45	<14	<59	220
AOC-4-8/2'	4/13/2020	2'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<9.6	<48	<14.6	<62.6	180
AOC-4-8/3'	4/13/2020	3'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.9	<49	<14.8	<63.8	140
AOC-4-8/4'	4/13/2020	4'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<10	<50	<14.8	<64.8	110
AOC-4-9/1'	4/13/2020	1'	<0.023	<0.047	<0.047	<0.094	<0.211	<4.7	<9.6	<48	<14.3	<62.3	260
AOC-4-9/2'	4/13/2020	2'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.8	<49	<14.6	<63.6	250
AOC-4-9/3'	4/13/2020	3'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<10	<50	<15	<65	220
AOC-4-9/4'	4/13/2020	4'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<9.7	<48	<14.6	<62.6	120
AOC-4-10/1'	4/13/2020	1'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.8	<49	<14.8	<63.8	180
AOC-4-10/2'	4/13/2020	2'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<9.7	<49	<14.7	<63.7	120
AOC-4-10/3'	4/13/2020	3'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.7	<49	<14.6	<63.6	250
AOC-4-10/4'	4/13/2020	4'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.7	<48	<14.5	<62.5	300

NA = Not Analyzed  
 TPH = Total Petroleum Hydrocarbons  
 mg/Kg = Milligrams per Kilogram

TABLE 6 - AOC-4 AREA COMPREHENSIVE SOIL BTEX (EPA 8260), TPH (EPA 8015) &amp; CHLORIDE (EPA 300) ANALYTICAL DATA

## PENASCO COMPRESSOR FACILITY

## EDDY COUNTY, NEW MEXICO

All values presented in parts per million (mg/Kg)

SAMPLE ID	DATE	DEPTH (FT)	BENZENE	TOLUENE	ETHYL-BENZENE	TOTAL XYLENES	TOTAL BTEX	TPH GRO C6-C10	TPH DRO C10-C28	TPH MRO C28-C36	TPH (GRO+DRO)	TPH (GRO+DRO+MRO)	CHLORIDE
May 2020 - Additional Site Assessment Samples													
AOC-4-7/5'	5/18/2020	5'	<0.12	<0.24	0.52	0.7	1.22	110	3,500	2,500	3,610	6,110	NA
AOC-4-7/6'	5/18/2020	6'	0.68	<0.98	20	46	66	1,000	7,100	2,800	8,100	10,900	NA
AOC-4-7/7'	5/18/2020	7'	0.54	<0.49	11	24	35	650	4,700	2,100	5,350	7,450	NA
AOC-4-7/8'	5/18/2020	8'	1.4	<0.97	13	28	41	790	5,300	2,200	6,090	8,290	NA
AOC-4-7/9'	5/18/2020	9'	0.81	<0.48	7.4	19	26.4	560	2,800	1,300	3,360	4,660	NA
AOC-4-7/10'	5/18/2020	10'	2.6	<0.48	14	37	51	1,100	4,900	2,000	6,000	8,000	NA
AOC-4-7/11'	5/18/2020	11'	1.4	<0.25	11	30	41	900	4,300	1,900	5,200	7,100	NA
AOC-4-7/12'	5/18/2020	12'	2	<0.48	14	38	52	890	5,400	2,300	6,290	8,590	NA
AOC-4-7/13'	5/18/2020	13'	1.8	<0.91	14	38	52	880	4,600	2,100	5,480	7,580	NA
AOC-4-7/14'	5/18/2020	14'	1.2	<0.97	12	31	43	890	2,700	1,300	3,590	4,890	NA
AOC-4-7/15'	5/18/2020	15'	0.6	<0.91	9.8	16	25.8	660	3,100	1,400	3,760	5,160	NA
AOC-4-7/16'	5/18/2020	16'	0.18	<0.23	5	0.54	5.54	330	200	85	530	615	NA
AOC-4-7/17'	5/18/2020	17'	0.17	<0.24	22	<0.47	22	1,200	5,300	2,300	6,500	8,800	NA
AOC-4-7/18'	5/18/2020	18'	<0.048	<0.095	2.8	0.56	3.36	250	1,300	680	1,550	2,230	NA
AOC-4-7/19'	5/18/2020	19'	<0.049	<0.098	4.7	<0.20	4.7	370	1,800	760	2,170	2,930	NA
AOC-4-7/20'	5/18/2020	20'	<0.11	<0.23	2.7	<0.46	2.7	250	840	320	1,090	1,410	NA
AOC-4-7(N)/2'	5/19/2020	2'	<0.023	<0.046	<0.046	<0.093	<0.208	<4.6	<8.2	<41	<12.8	<53.8	NA
AOC-4-7(N)/4'	5/19/2020	4'	<0.023	<0.047	<0.047	<0.094	<0.211	<4.7	<9.1	130	<13.8	130	NA
AOC-4-7(N)/6'	5/19/2020	6'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<10	<50	<14.8	<64.8	NA
AOC-4-7(N)/8'	5/19/2020	8'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<8.4	<42	<13.3	<55.3	NA
AOC-4-7(N)/10'	5/19/2020	10'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<8.8	<44	<13.7	<57.7	NA
AOC-4-7(N)/12'	5/19/2020	12'	<0.024	<0.049	<0.049	<0.098	<0.218	<4.9	<9.6	<48	<14.5	<62.5	NA
AOC-4-7(N)/14'	5/19/2020	14'	<0.024	<0.049	0.18	0.2	0.38	26	490	410	516	926	NA
AOC-4-7(N)/16'	5/19/2020	16'	<0.025	<0.050	0.11	<0.10	0.11	10	240	160	250	410	NA
AOC-4-7(N)/18'	5/19/2020	18'	<0.12	<0.24	1.1	<0.48	1.1	49	180	120	229	410	NA
AOC-4-7(N)/20'	5/19/2020	20'	<0.12	<0.25	1.3	<0.50	1.3	59	440	280	499	410	NA
AOC-4-7(N-2)/2'	5/19/2020	2'	<0.024	<0.049	<0.049	<0.098	<0.218	<4.9	<10	<50	<14.9	<64.9	NA
AOC-4-7(N-2)/4'	5/19/2020	4'	<0.024	<0.048	<0.048	<0.097	<0.219	<4.8	<10	<51	<14.8	<65.8	NA
AOC-4-7(N-2)/6'	5/19/2020	6'	<0.024	<0.047	<0.047	<0.095	<0.213	<4.7	<8.3	<41	<13	<54	NA
AOC-4-7(N-2)/8'	5/19/2020	8'	<0.024	<0.049	<0.049	<0.098	<0.218	<4.9	<8.3	<42	<13.2	<55.2	NA
AOC-4-7(N-2)/10'	5/19/2020	10'	<0.023	<0.047	<0.047	<0.094	<0.211	<4.7	<9.3	<46	<14	<60	NA
AOC-4-7(N-2)/12'	5/19/2020	12'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.3	<47	<14.1	<61.1	NA
AOC-4-7(N-2)/14'	5/19/2020	14'	<0.024	<0.047	<0.047	<0.094	<0.211	<4.7	<8.6	<43	<13.3	<56.3	NA
AOC-4-7(N-2)/16'	5/19/2020	16'	<0.12	<0.23	<0.23	<0.47	<1.13	<23	<8.8	<44	<31.8	<75.8	NA
AOC-4-7(N-2)/18'	5/19/2020	18'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.1	<45	<14	<59	NA
AOC-4-7(N-2)/20'	5/19/2020	20'	<0.12	<0.23	<0.23	<0.47	<1.13	<23	<9.8	<49	<32.8	<81.8	NA
AOC-4-7(S)/4'	5/19/2020	4'	<0.025	<0.050	0.18	0.46	0.64	9.6	520	300	529.6	829.6	NA
AOC-4-7(S)/6'	5/19/2020	6'	0.024	<0.046	0.11	0.49	0.6	61	9,000	4,700	9,061	13,761	NA
AOC-4-7(S)/8'	5/19/2020	8'	0.33	<0.50	10	25	35	450	3,900	1,600	4,350	5,950	NA
AOC-4-7(S)/10'	5/19/2020	10'	0.26	<0.24	9.7	23	32.7	530	2,600	1,100	3,130	4,230	NA
AOC-4-7(S)/12'	5/19/2020	12'	<0.12	<0.24	2.2	5.9	8.1	160	1,500	900	1,660	2,560	NA
AOC-4-7(S)/14'	5/19/2020	14'	0.35	<0.49	4.5	12	16.5	240	3,100	1,400	3,340	4,740	NA
AOC-4-7(S)/16'	5/19/2020	16'	0.21	<0.49	3.4	<0.97	3.4	140	2,600	1,100	2,740	3,840	NA
AOC-4-7(S)/18'	5/19/2020	18'	<0.12	<0.25	1.8	0.52	2.32	100	1,000	580	1,100	1,680	NA
AOC-4-7(S)/20'	5/19/2020	20'	<0.12	<0.25	0.36	<0.49	0.36	40	480	190	520	710	NA
AOC-4-7(S)/22'	5/19/2020	22'	<0.12	<0.25	<0.25	<0.50	<1.12	<25	480	260	480	740	NA
AOC-4-7(S.2)/4'	5/19/2020	4'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	17	<44	17	17	NA
AOC-4-7(S.2)/6'	5/19/2020	6'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.6	<48	<14.6	<62.6	NA
AOC-4-7(S.2)/8'	5/19/2020	8'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<8.9	<45	<13.9	<58.9	NA
AOC-4-7(S.2)/10'	5/19/2020	10'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<6.2	<31	<11.1	<42.1	NA
AOC-4-7(S.2)/12'	5/19/2020	12'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	16	<47	16	16	NA

NA = Not Analyzed  
 TPH = Total Petroleum Hydrocarbons  
 mg/Kg = Milligrams per Kilogram

**TABLE 6 - AOC-4 AREA COMPREHENSIVE SOIL BTEX (EPA 8260), TPH (EPA 8015) & CHLORIDE (EPA 300) ANALYTICAL DATA**  
**PENASCO COMPRESSOR FACILITY**  
**EDDY COUNTY, NEW MEXICO**

All values presented in parts per million (mg/Kg)

SAMPLE ID	DATE	DEPTH (FT)	BENZENE	TOLUENE	ETHYL-BENZENE	TOTAL XYLENES	TOTAL BTEX	TPH GRO C6-C10	TPH DRO C10-C28	TPH MRO C28-C36	TPH (GRO+DRO)	TPH (GRO+DRO+MRO)	CHLORIDE
AOC-4-7(S.3)/4'	5/21/2020	4'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<8.0	<40	<12.9	<52.9	NA
AOC-4-7(S.3)/6'	5/21/2020	6'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<9.4	<47	<14.4	<61.4	NA
AOC-4-7(S.3)/8'	5/21/2020	8'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.6	<48	<14.5	<62.5	NA
AOC-4-7(S.3)/10'	5/21/2020	10'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<9.0	<45	<14	<59	NA
AOC-4-7(S.3)/12'	5/21/2020	12'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<8.0	<40	<12.9	<52.9	NA
AOC-4-7(S.3)/14'	5/21/2020	14'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<7.7	<38	<12.7	<50.7	NA
AOC-4-7(S.3)/16'	5/21/2020	16'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<6.8	<34	<11.7	<18.5	NA
AOC-4-7(S.3)/18'	5/21/2020	18'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	15	<43	15	15	NA
AOC-4-7(S.3)/20'	5/21/2020	20'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	18	<50	18	18	NA
AOC-4-7(S.3)/22'	5/21/2020	22'	<0.024	<0.048	<0.048	<0.097	<0.217	5.2	87	<47	92.2	92.2	NA
AOC-4-7(S.3)/24'	5/21/2020	24'	<0.024	<0.048	<0.048	<0.095	<0.215	6.3	130	100	136.3	236.3	NA
AOC-4-7(E.2)/4'	5/19/2020	4'	<0.024	<0.049	<0.049	<0.097	<0.218	<4.9	<9.0	<45	<13.9	<58.9	NA
AOC-4-7(E.2)/6'	5/19/2020	6'	<0.025	<0.049	<0.049	<0.098	<0.217	<4.9	<9.1	<46	<14	<60	NA
AOC-4-7(E.2)/8'	5/19/2020	8'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<8.9	<44	<13.9	<57.9	NA
AOC-4-7(E.2)/10'	5/19/2020	10'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<8.0	<40	<12.8	<52.8	NA
AOC-4-7(E.2)/12'	5/19/2020	12'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<8.9	<44	<13.8	<57.8	NA
AOC-4-7(E.2)/14'	5/19/2020	14'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.5	<48	<14.3	<62.3	NA
AOC-4-7(E.2)/16'	5/19/2020	16'	<0.024	<0.049	0.21	<0.097	0.21	31	65	95	96	191	NA
AOC-4-7(E.2)/18'	5/19/2020	18'	<0.023	<0.046	<0.046	<0.092	<0.23	<4.6	15	<47	15	15	NA
AOC-4-7(E.2)/20'	5/19/2020	20'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	30	55	30	85	NA
AOC-4-7(E.2)/22'	5/19/2020	22'	<0.025	<0.050	0.061	<0.099	0.061	15	150	290	165	455	NA
AOC-4-7(E.2)/4'	5/21/2020	4'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<7.7	<38	<12.6	<50.6	NA
AOC-4-7(E.2)/6'	5/21/2020	6'	<0.024	<0.049	<0.049	<0.098	<0.220	<4.9	<8.6	<43	<13.5	<56.5	NA
AOC-4-7(E.2)/8'	5/21/2020	8'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<9.6	<48	<14.6	<62.6	NA
AOC-4-7(E.2)/10'	5/21/2020	10'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<10	<51	<14.9	<65.9	NA
AOC-4-7(E.2)/12'	5/21/2020	12'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.4	<47	<14.2	<61.2	NA
AOC-4-7(E.2)/14'	5/21/2020	14'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<8.5	<43	<13.4	<56.4	NA
AOC-4-7(E.2)/16'	5/21/2020	16'	<0.12	<0.25	<0.25	<0.50	<1.12	<25	130	200	130	330	NA
AOC-4-7(E.2)/18'	5/21/2020	18'	<0.048	<0.096	<0.096	<0.19	<0.43	<9.6	<8.1	<41	<17.7	<58.7	NA
AOC-4-7(E.2)/20'	5/21/2020	20'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.3	<47	<14.3	<61.3	NA
AOC-4-7(E.2)/22'	5/21/2020	22'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	12	<46	12	12	NA
AOC-4-7(E.3)/2'	5/21/2020	2'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.2	<46	<14.1	<60.1	310
AOC-4-7(E.3)/4'	5/21/2020	4'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<8.9	<44	<13.8	<57.8	230
AOC-4-7(E.3)/6'	5/21/2020	6'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<8.9	<45	<13.7	<58.7	NA
AOC-4-7(E.3)/8'	5/21/2020	8'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<8.9	<44	<13.8	<57.8	NA
AOC-4-7(E.3)/10'	5/21/2020	10'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<9.4	<47	<14.4	<61.4	NA
AOC-4-7(E.3)/12'	5/21/2020	12'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<8.6	<43	<13.4	<56.4	NA
AOC-4-7(E.3)/14'	5/21/2020	14'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.4	<47	<14.3	<61.3	NA
AOC-4-7(E.3)/16'	5/21/2020	16'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	<9.5	<47	<14.5	<61.5	NA
AOC-4-7(E.3)/18'	5/21/2020	18'	<0.025	<0.049	<0.049	<0.099	<0.222	<4.9	<9.8	<49	<14.7	<63.7	NA
AOC-4-7(E.3)/20'	5/21/2020	20'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.0	<45	<13.9	<58.9	NA
AOC-4-7(W)/1'	5/18/2020	1'	<0.023	<0.046	<0.046	<0.092	<0.207	<4.6	<9.7	<48	<14.3	<62.3	NA
AOC-4-7(W)/2'	5/18/2020	2'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<10	<51	<14.8	<65.8	NA
AOC-4-7(W)/3'	5/18/2020	3'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<8.9	<44	<13.7	<57.7	NA
AOC-4-7(W)/4'	5/18/2020	4'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<9.6	<48	<14.6	<62.6	NA
AOC-4-7(W)/10'	5/18/2020	10'	<0.12	<0.24	1.2	3.2	4.4	170	880	360	1,050	1,410	NA
AOC-4-7(W)/12'	5/18/2020	12'	<0.12	<0.24	2.3	1.9	4.2	230	1,200	450	1,430	1,880	NA
AOC-4-7(W)/14'	5/18/2020	14'	<0.12	<0.23	3.6	4.7	8.3	370	2,000	780	2,370	3,150	NA
AOC-4-7(W)/16'	5/18/2020	16'	<0.12	<0.23	10	0.96	10.96	710	3,400	1,400	4,110	5,510	NA
AOC-4-7(W)/18'	5/18/2020	18'	0.12	<0.24	12	<0.49	12	660	3,400	1,300	4,060	5,360	NA
AOC-4-7(W)/20'	5/18/2020	20'	<0.12	<0.24	3.3	<0.47	3.3	300	1,500	610	1,800	2,410	NA

NA = Not Analyzed  
TPH = Total Petroleum Hydrocarbons  
mg/Kg = Milligrams per Kilogram

TABLE 6 - AOC-4 AREA COMPREHENSIVE SOIL BTEX (EPA 8260), TPH (EPA 8015) & CHLORIDE (EPA 300) ANALYTICAL DATA  
PENASCO COMPRESSOR FACILITY  
EDDY COUNTY, NEW MEXICO

All values presented in parts per million (mg/Kg)

SAMPLE ID	DATE	DEPTH (FT)	BENZENE	TOLUENE	ETHYL-BENZENE	TOTAL XYLENES	TOTAL BTEX	TPH GRO C6-C10	TPH DRO C10-C28	TPH MRO C28-C36	TPH (GRO+DRO)	TPH (GRO+DRO+MRO)	CHLORIDE
AOC-4-7(W-2)/2'	5/18/2020	2'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<8.8	<44	<13.6	<57.6	NA
AOC-4-7(W-2)/4'	5/18/2020	4'	<0.024	<0.049	<0.049	<0.098	<0.22	<4.9	<9.7	<48	<14.6	<62.6	NA
AOC-4-7(W-2)/6'	5/18/2020	6'	<0.023	<0.046	<0.046	<0.093	<0.208	<4.6	<9.2	<46	<13.8	<59.8	NA
AOC-4-7(W-2)/8'	5/18/2020	8'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.2	<46	<14	<60	NA
AOC-4-7(W-2)/10'	5/18/2020	10'	<0.025	<0.049	<0.049	<0.098	<0.05	<4.9	<9.4	<47	<14.3	<61.3	NA
AOC-4-7(W-2)/12'	5/18/2020	12'	<0.024	<0.047	<0.047	<0.095	<0.213	<4.7	<9.9	<49	<14.6	<63.6	NA
AOC-4-7(W-2)/14'	5/18/2020	14'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.1	<45	<13.9	<58.9	NA
AOC-4-7(W-2)/16'	5/18/2020	16'	<0.024	<0.049	<0.049	<0.097	<0.218	<4.9	<8.7	<43	<13.6	<46.6	NA
AOC-4-7(W-2)/18'	5/18/2020	18'	<0.12	<0.24	0.86	<0.47	0.86	140	1,400	660	1,540	2,200	NA
AOC-4-7(W-2)/20'	5/18/2020	20'	<0.024	<0.048	<0.048	<0.097	<0.217	10	<6.0	<30	10	10	NA
AOC-4-7(W-3)/2'	5/19/2020	2'	<0.025	<0.050	<0.050	<0.099	<0.224	<5.0	130	490	130	620	NA
AOC-4-7(W-3)/4'	5/19/2020	4'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	<9.5	<47	<14.3	<61.3	NA
AOC-4-7(W-3)/6'	5/19/2020	6'	<0.024	<0.048	<0.048	<0.097	<0.217	<4.8	<9.6	<48	<14.3	<62.3	NA
AOC-4-7(W-3)/8'	5/19/2020	8'	<0.024	<0.047	<0.047	<0.095	<0.213	<4.7	<8.9	<44	<13.6	<57.6	NA
AOC-4-7(W-3)/10'	5/19/2020	10'	<0.025	<0.049	<0.049	<0.098	<0.221	<4.9	<9.0	<45	<13.9	<58.9	NA
AOC-4-7(W-3)/12'	5/19/2020	12'	<0.023	<0.046	<0.046	<0.091	<0.206	<4.6	<7.4	<37	<12	<49	NA
AOC-4-7(W-3)/14'	5/19/2020	14'	<0.023	<0.046	<0.046	<0.092	<0.207	<4.6	<9.2	<46	<13.8	<59.8	NA
AOC-4-7(W-3)/16'	5/19/2020	16'	<0.024	<0.049	<0.049	<0.097	<0.219	<4.9	<9.5	<47	<14.4	<61.4	NA
AOC-4-7(W-3)/18'	5/19/2020	18'	<0.024	<0.048	<0.048	<0.096	<0.216	<4.8	18	<36	18	18	NA
AOC-4-7(W-3)/20'	5/19/2020	20'	<0.025	<0.050	<0.050	<0.10	<0.225	<5.0	<10	<50	<15	<65	NA
July 7-8, 2020 - AOC-4-7 Area Soil Borings													
B-AOC-4-7/25'	7/7/2020	25'	NA	NA	NA	NA	NA	79	450	400	529	929	NA
B-AOC-4-7/30'	7/7/2020	30'	NA	NA	NA	NA	NA	<24	420	440	420	860	NA
B-AOC-4-7/35'	7/7/2020	35'	NA	NA	NA	NA	NA	<23	250	260	250	510	NA
B-AOC-4-7/40'	7/7/2020	40'	NA	NA	NA	NA	NA	<3.6	32	<48	32	32	NA
B-N-1/25'	7/8/2020	25'	NA	NA	NA	NA	NA	<14	14	<46	14	14	NA
B-N-1/30'	7/8/2020	30'	NA	NA	NA	NA	NA	<18	74	88	74	162	NA
B-N-1/35'	7/8/2020	35'	NA	NA	NA	NA	NA	<17	24	<49	24	24	NA
B-N-1/40'	7/8/2020	40'	NA	NA	NA	NA	NA	<19	26	<45	26	26	NA
B-N-1/45'	7/8/2020	40'	NA	NA	NA	NA	NA	<18	80	64	80	144	NA
B-N-1/50'	7/8/2020	40'	NA	NA	NA	NA	NA	<15	35	48	35	83	NA
B-N-2/25'	7/7/2020	25'	NA	NA	NA	NA	NA	<3.8	50	650	50	700	NA
B-N-2/30'	7/7/2020	30'	NA	NA	NA	NA	NA	<4.3	95	330	95	425	NA
B-N-2/35'(A)	7/7/2020	35'	NA	NA	NA	NA	NA	<4.2	14	<45	14	14	NA
B-N-2/40'	7/7/2020	40'	NA	NA	NA	NA	NA	<4.0	<9.6	<48	<13.6	<61.6	NA
B-S-1/25'	7/8/2020	25'	NA	NA	NA	NA	NA	<3.5	24	<50	24	24	NA
B-S-1/30'	7/8/2020	30'	NA	NA	NA	NA	NA	<4.0	29	<49	29	29	NA
B-S-1/35'	7/8/2020	35'	NA	NA	NA	NA	NA	<3.5	30	<50	30	30	NA
B-S-1/40'	7/8/2020	40'	NA	NA	NA	NA	NA	<3.1	20	<48	20	20	NA
B-S-2/25'	7/8/2020	25'	NA	NA	NA	NA	NA	<5.0	23	<50	23	23	NA
B-S-2/30'	7/8/2020	30'	NA	NA	NA	NA	NA	<5.0	10	<48	10	10	NA
B-S-2/35'	7/8/2020	35'	NA	NA	NA	NA	NA	<5.0	<9.9	<49	<14.9	<63.9	NA
B-S-2/40'	7/8/2020	40'	NA	NA	NA	NA	NA	<5.0	<9.3	<47	<14.3	<61.3	NA

NA = Not Analyzed  
TPH = Total Petroleum Hydrocarbons  
mg/Kg = Milligrams per Kilogram

**TABLE 6 - AOC-4 AREA COMPREHENSIVE SOIL BTEX (EPA 8260), TPH (EPA 8015) & CHLORIDE (EPA 300) ANALYTICAL DATA**  
**PENASCO COMPRESSOR FACILITY**  
**EDDY COUNTY, NEW MEXICO**

All values presented in parts per million (mg/Kg)

SAMPLE ID	DATE	DEPTH (FT)	BENZENE	TOLUENE	ETHYL-BENZENE	TOTAL XYLENES	TOTAL BTEX	TPH GRO C6-C10	TPH DRO C10-C28	TPH MRO C28-C36	TPH (GRO+DRO)	TPH (GRO+DRO+MRO)	CHLORIDE
B-E-1/23'	7/8/2020	23'	NA	NA	NA	NA	NA	<16	23	51	23	74	NA
B-E-1/28	7/8/2020	28'	NA	NA	NA	NA	NA	<17	29	58	29	87	NA
B-E-1/33'	7/8/2020	33'	NA	NA	NA	NA	NA	<2.9	<9.4	<47	<12.3	<59.3	NA
B-E-1/38'	7/8/2020	38'	NA	NA	NA	NA	NA	<3.3	17	<46	17	17	NA
B-E-2/25'	7/8/2020	25'	NA	NA	NA	NA	NA	<3.2	9.9	<44	9.9	9.9	NA
B-E-2/30'	7/8/2020	30'	NA	NA	NA	NA	NA	<2.4	<9.5	<47	<11.9	<58.9	NA
B-E-2/35'	7/8/2020	35'	NA	NA	NA	NA	NA	<3.7	14	<46	14	14	NA
B-E-2/40'	7/8/2020	40'	NA	NA	NA	NA	NA	<4.0	12	<48	12	12	NA
B-W-1/25'	7/7/2020	25'	NA	NA	NA	NA	NA	36	500	280	536	816	NA
B-W-1/30'	7/7/2020	30'	NA	NA	NA	NA	NA	26	810	560	836	1,370	NA
B-W-1/35'	7/7/2020	35'	NA	NA	NA	NA	NA	<20	660	460	660	1,120	NA
B-W-1/40'	7/7/2020	40'	NA	NA	NA	NA	NA	<17	430	300	430	730	NA
B-W-2/25'	7/8/2020	25'	NA	NA	NA	NA	NA	<3.9	<9.7	48	<13.6	48	NA
B-W-2/30'	7/8/2020	30'	NA	NA	NA	NA	NA	<3.9	12	<49	12	12	NA
B-W-2/35'	7/8/2020	35'	NA	NA	NA	NA	NA	<3.3	10	<48	10	10	NA
B-W-2/40'	7/8/2020	40'	NA	NA	NA	NA	NA	<14	10	<50	10	10	NA
B-W-2/45'	7/8/2020	45'	NA	NA	NA	NA	NA	<13	39	<48	39	39	NA
<b>19.15.29.12 NMAC Table 1 Closure Criteria for Soils Impacted by a Release (GW &gt;100')</b>			<b>10</b>	---	---	---	<b>50</b>	---	---	---	<b>1,000</b>	<b>2,500</b>	<b>20,000</b>
<b>19.15.29.13 NMAC Reclamation Criteria (0'-4' Soils Only)</b>			<b>10<sup>3</sup></b>				<b>50<sup>3</sup></b>				<b>100<sup>3</sup></b>	<b>600</b>	

## Notes:

- Results exceeding the Table 1 Closure Criteria are presented in bold type and are highlighted yellow.
- Results exceeding the NMAC Restoration, Reclamation and re-vegetation chloride concentration requirements are presented in bold red type.
- Value derived from the State of New Mexico Energy, Minerals and Natural Resources Department document *Procedures for the Implementation of the Spill Rule* (19.15.29 NMAC) dated September 6, 2019.
- NA - Not Analyzed

## ATTACHMENT 1 – SITE PHOTOGRAPHS





**PHOTOGRAPH NO. 1 – A view collected at the Site during the initial assessment process.**  
(Approximate GPS coordinates: 32.713253, -104.448740)



**PHOTOGRAPH NO. 2 – A view of the assessment activities in the AOC-1 area on May 18, 2020.**

(Approximate GPS coordinates: 32.714711, -104.449841)





**PHOTOGRAPH NO. 3 – A view of the additional assessment activities in the AOC-4 area.**  
(Approximate GPS coordinates: 32.713328, -104.448762)



**PHOTOGRAPH NO. 4 – A view of the excavated area in AOC-4.**  
(Approximate GPS coordinates: 32.713310, -104.448583)



**PHOTOGRAPH NO. 5 – A view collected during the soil boring installation process in the vicinity of sample location AOC-4-7.**

(Approximate GPS coordinates: 32.713068, -104.448881)



**PHOTOGRAPH NO. 6 – A view of the excavation associated with the AOC-1 area upon completion of the soil removal operations. The view is towards the northwest.**

(Approximate GPS coordinates: 32.714635, -104.449642)





**PHOTOGRAPH NO. 7 – A view of the former location of the AOC-1 area treatment cell. The view is towards the south.**

*(Approximate GPS coordinates: 32.714349, -104.449732)*



**PHOTOGRAPH NO. 8 – A view of the AOC-7 area excavation during the initial cleanup confirmation sampling event. The view is towards the southeast.**

*(Approximate GPS coordinates: 32.713608, -104.449712)*





**PHOTOGRAPH NO. 9 – A view of the over-excavated areas within AOC-7. The view is to the west.**

(Approximate GPS coordinates: 32.713651, -104.449629)



**PHOTOGRAPH NO. 10 – A view of the former AOC-7 area treatment cell location. The view is towards the southwest.**

(Approximate GPS coordinates: 32.713595, -104.449253)

## ATTACHMENT 2 – NOVEMBER 27, 2023 NMOCD CORRESPONDENCE

**From:** [OCDOnline@state.nm.us](mailto:OCDOnline@state.nm.us) <[OCDOnline@state.nm.us](mailto:OCDOnline@state.nm.us)>  
**Sent:** Monday, November 27, 2023 3:19 PM  
**To:** Tina Huerta <[Tina.Huerta@eogresources.com](mailto:Tina.Huerta@eogresources.com)>  
**Subject:** The Oil Conservation Division (OCD) has rejected the application, Application ID: 230195

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

To whom it may concern (c/o Tina Huerta for EOG RESOURCES INC),

The OCD has rejected the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nAPP2105437946, for the following reasons:

- **The Remediation Plan is Denied. The variance request is approved to allow for utilization of the 19.15.29.12 NMAC Table 1 Closure Criteria for Soils Impacted by a Release (Depth-to-Groundwater >100 Feet) Criteria. The variance to allow for the utilization of a 20-mil synthetic liner at the site is denied. No treated soils are approved for backfill. A thorough discussion needs to be included in the report outlining, at a minimum, sampling treatment protocols, processes, and mechanics. All samples must be analyzed for all constituents listed in Table I of 19.15.29.12 NMAC. Please collect confirmation samples, representing no more than 200 ft<sup>2</sup>. Sidewall/Edge samples should be delineated/excavated to 600 mg/kg for chlorides and 100 mg/kg for TPH to define the edge of the release. All sidewall samples should be taken from the sidewall of the excavation. Any off-pad area must meet reclamation standards set forth in the OCD Spill Rule.**

The rejected C-141 can be found in the OCD Online: Permitting - Action Status, under the Application ID: 230195.

Please review and make the required correction(s) prior to resubmitting.

If you have any questions why this application was rejected or believe it was rejected in error, please contact me prior to submitting an additional C-141.

Thank you,  
Robert Hamlet  
575-748-1283  
[Robert.Hamlet@emnrd.nm.gov](mailto:Robert.Hamlet@emnrd.nm.gov)

New Mexico Energy, Minerals and Natural Resources Department  
1220 South St. Francis Drive  
Santa Fe, NM 87505

One attachment • Scanned by Gmail





**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**

QUESTIONS

Action 305428

**QUESTIONS**

Operator: EOG RESOURCES INC 5509 Champions Drive Midland, TX 79706	OGRID:
	7377
	Action Number:
	305428
Action Type:	
[C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)	

**QUESTIONS**

<b>Prerequisites</b>	
Incident ID (n#)	nAPP2105437946
Incident Name	NAPP2105437946 PENASCO COMPRESSOR STATION @ 0
Incident Type	Oil Release
Incident Status	Remediation Plan Received

<b>Location of Release Source</b>	
Please answer all the questions in this group.	
Site Name	PENASCO COMPRESSOR STATION
Date Release Discovered	04/13/2020
Surface Owner	Federal

<b>Incident Details</b>	
Please answer all the questions in this group.	
Incident Type	Oil Release
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

<b>Nature and Volume of Release</b>	
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	Not answered.
Produced Water Released (bbls) Details	Not answered.
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	Cause: Other   Other (Specify)   Other (Specify)   Released: 0 BBL (Unknown Released Amount)   Recovered: 0 BBL   Lost: 0 BBL.
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.

**District I**

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1000 Rio Brazos Rd., Aztec, NM 87410  
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**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**

QUESTIONS, Page 2

Action 305428

**QUESTIONS (continued)**

Operator: EOG RESOURCES INC 5509 Champions Drive Midland, TX 79706	OGRID:	7377
	Action Number:	305428
	Action Type:	[C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

**QUESTIONS**

<b>Nature and Volume of Release (continued)</b>	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
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: Tina Huerta Title: Regulatory Reporting Supervisor Email: tina_huerta@eogresources.com Date: 01/19/2024
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**District I**

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Phone:(575) 393-6161 Fax:(575) 393-0720

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Phone:(575) 748-1283 Fax:(575) 748-9720

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

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Phone:(505) 476-3470 Fax:(505) 476-3462

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**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
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**Santa Fe, NM 87505**

QUESTIONS, Page 3

Action 305428

**QUESTIONS (continued)**

Operator: EOG RESOURCES INC 5509 Champions Drive Midland, TX 79706	OGRID:
	7377
	Action Number: 305428
	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	Attached Document
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	Between 1 and 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between ½ and 1 (mi.)
Any other fresh water well or spring	Between ½ and 1 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between ½ and 1 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Between 1 and 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Medium
A 100-year floodplain	Between ½ and 1 (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)	840
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	12200
GRO+DRO (EPA SW-846 Method 8015M)	9000
BTEX (EPA SW-846 Method 8021B or 8260B)	91.8
Benzene (EPA SW-846 Method 8021B or 8260B)	0

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	12/11/2023
On what date will (or did) the final sampling or liner inspection occur	03/31/2024
On what date will (or was) the remediation complete(d)	03/31/2024
What is the estimated surface area (in square feet) that will be reclaimed	11175
What is the estimated volume (in cubic yards) that will be reclaimed	4500
What is the estimated surface area (in square feet) that will be remediated	11175
What is the estimated volume (in cubic yards) that will be remediated	4500

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 305428

QUESTIONS (continued)

Operator: EOG RESOURCES INC 5509 Champions Drive Midland, TX 79706	OGRID:	7377
	Action Number:	305428
	Action Type:	[C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

<b>Remediation Plan (continued)</b>	
<i>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.</i>	
<b>This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:</b>	
<i>(Select all answers below that apply.)</i>	
(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	LEA LAND LANDFILL [fEEM0112342028]
<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)	Not answered.
(In Situ) Soil Vapor Extraction	Not answered.
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	Not answered.
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	Not answered.
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	Not answered.
Ground Water Abatement pursuant to 19.15.30 NMAC	Not answered.
OTHER (Non-listed remedial process)	Not answered.
<i>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>	
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: Tina Huerta Title: Regulatory Reporting Supervisor Email: tina_huerta@eogresources.com Date: 01/19/2024
<i>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.</i>	

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QUESTIONS, Page 5  
  
Action 305428

QUESTIONS (continued)

Operator: EOG RESOURCES INC 5509 Champions Drive Midland, TX 79706	OGRID: 7377
	Action Number: 305428
	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 305428

**QUESTIONS (continued)**

Operator: EOG RESOURCES INC 5509 Champions Drive Midland, TX 79706	OGRID:
	7377
	Action Number:
	305428
Action Type:	
[C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)	

**QUESTIONS**

Sampling Event Information	
Last sampling notification (C-141N) recorded	320223
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	03/18/2024
What was the (estimated) number of samples that were to be gathered	56
What was the sampling surface area in square feet	11200

**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 305428

CONDITIONS

Operator: EOG RESOURCES INC 5509 Champions Drive Midland, TX 79706	OGRID:
	7377
	Action Number: 305428
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

CONDITIONS

Created By	Condition	Condition Date
scwells	Remediation Plan Approved with Conditions: On pg. 8 of plan it states: "it is proposed to utilize the facility pad material as backfill material for the AOC-4 area." If EOG plans to use this material, at least one (1) representative 5-point composite sample will need to be collected per every 100 cubic yards of soil from the backfill material that will be used for the reclamation of the top four feet of the excavation and laboratory results need to be submitted to the OCD. If the pad material being proposed to be used as backfill returns results above 600 mg/kg Cl, 100 mg/kg TPH, 50 mg/kg BTEX, 10 mg/kg benzene, the material cannot be used. The acceptance of this 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.	3/13/2024
scwells	In addition, OCD approval does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations. As requested, EOG has until July 11, 2024 to submit a remediation closure report to the OCD.	3/13/2024