



McNabb Partners, LLC
Hobbs • Carlsbad • Midland
575.397.0050
www.mcnabbpartnersllc.com

May 21, 2024

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

RE: Deferral Request
Incident ID: nAPP2326344306
Bell Lake Unit #4 1
Project ID: 20230916-0830-BellLake4

NMOCD:

McNabb Partners LLC submits a deferral request for above incident on behalf of Kaiser-Francis Oil Company.

This report includes remediation and restoration activities completed outside of the deferral request area as proposed in the Characterization Report and Remediation Workplan, approved by NMOCD on April 5, 2024 (communications included in Appendix A). Bioremediation activities within the tank battery (deferral request area) are also described. Details of the site characterization and delineation are included in the previously submitted report and presented in the OCD Permitting Digitized C-141 online reporting system.

- Plate 1: Site Map (reproduced from Characterization Report and Remediation Workplan)

1. Remediation and Restoration Activities

Remediation activities began on May 3rd, 2024. The remediation extent was divided into sample grids of not more than 200 sq ft inclusive of the impacted area outside of the tank battery identified by characterization sample CS-0.3.2.

- Plate 2 shows the base grids with associated square footage in relation to the characterization sample points which met or exceeded closure criteria.



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Impacted areas were excavated until walls and bases met Closure Criteria as listed in Table 1 of 19.15.29 NMAC for areas “in use” and where depth to water is 50 – 100 ft bgs.

DTW 51-100 ft	Chloride (mg/kg)	GRO+DRO (mg/kg)	TPH Ext. (mg/kg)	Benzene (mg/kg)	BTEX (mg/kg)
0 - 4 feet & "not in-use"	600	--	100	10	50
> 4 ft or "in-use"	10,000	1,000	2,500	10	50

Confirmation soil samples (composite) collected from the excavation base depth at 2.5 ft (BS-01 and BS-02) and excavation sidewalls (SW-01 through SW-04) were submitted for laboratory analysis of chloride, TPH and BTEX. Sample event notifications are included in Appendix A. Analytical results indicate that all samples were under NMOCD Closure Criteria from Table I.

- Plate 3 shows the location of the confirmation sample points and the excavation extent and depth.
- Confirmation sample results are included in Table A Summary of Analytical.
- Certificate of Analysis for confirmation samples are included in Appendix B. (Please refer to Characterization Report and Remediation Workplan for characterization sample Certificates of Analysis).

During the excavation activities, approximately 48 cubic yards of impacted material were hauled offsite to an approved facility for proper disposal. All excavated surface soils were presumed impacted and included in off-site disposal.



Figure 1: View of final excavation. Date 05/03/2024.



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Following the receipt of analytical data, on May 14th, 2024, the excavation was backfilled with a clean, non-waste containing material. A sample of backfill material (Backfill-1) was analyzed for chloride, TPH, Benzene and chloride to confirm its suitability for on-site use.

Figure 2: View of the backfilled and restored excavation area.



Along with the excavation activities on May 3rd, 2024, in-site bioremediation was conducted on the impacted area within bermed containment. The impacted soils were treated with 425 gallons of 6% Micro-Blaze solution to address the contaminants within the bermed containment, represented by delineation samples CS-03, CS-05 and CS-06.1. Please see Deferral Request for this area pending complete remediation/restoration following deconstruction of facility.

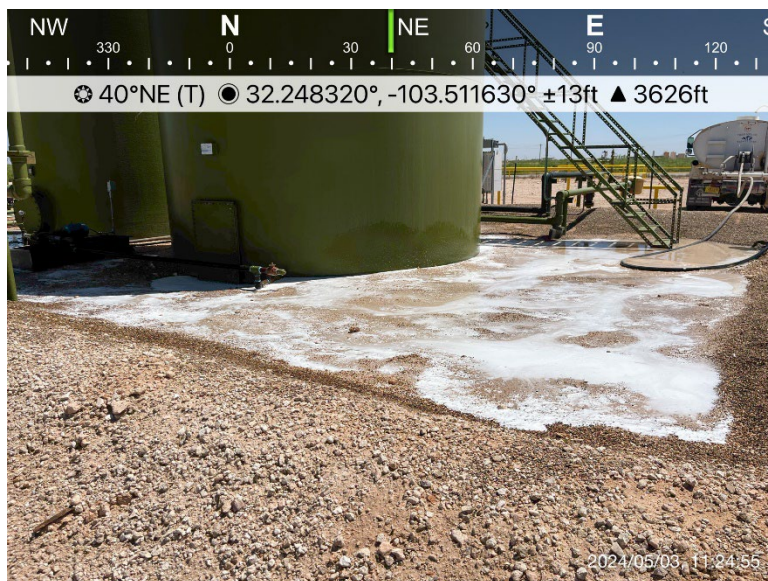


Figure 3: View of Micro-Blaze application. Date: 05/03/2024



Project ID: 20230916-0830-BellLake4
 Location: Bell Lake Unit #4 1
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Remediation Closure Request	
Requesting a remediation closure approval with this submission?	Yes
Have the lateral and vertical extents of contamination been fully delineated?	Yes
Was this release entirely contained within a lined containment area?	No
All areas reasonably needed for production or subsequent drilling operations have been stabilized?	Yes
What was the total surface area (in sq ft) remediated?	387
What was the total volume (cubic yards) remediated?	48
All areas not reasonably needed for production or subsequent drilling operations have been reclaimed to contain a minimum of 4 ft non waste containing material with concentration less than 600 mg/kg chloridez?	Yes
What was the total surface area (in sq ft) reclaimed?	387
What was the total volume (in cubic yards) reclaimed?	48
Summarize any addition remediation activities not included in answers above	Please refer to above text regarding bioremediation activities within tank battery containment.

The area of remediation outside of the tank battery was restored per 19.15.29.13. A-C NMAC to prior condition as an active production site. The surface was compacted, stabilized and graded to prevent erosion, pooling of water and to minimize dust (Figure 2).

2. Deferral Request

We respectfully ask NMOCD for deferral of remediation around active production equipment within the tank battery area (Plate 4) per 19.15.29.12.C.(2) NMAC. Remediation around the tank battery and pipelines would cause a major facility deconstruction (Figure 4). The surface area of the tank battery deferral area is 3,431 sq. ft.



Project ID: 20230916-0830-BellLake4
 Location: Bell Lake Unit #4 1
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Deferral Requests Only	
Requesting a deferral of the remediation closure due date with approval of this submission?	Yes
Have the lateral and vertical extents of the contamination been fully delineated?	Yes
Is the remaining contamination in areas immediately under or around production equipment where remediation could cause a major facility deconstruction?	Yes
What is the remaining surface area (in sq ft) that will still need to be remediated if deferral is granted?	3,431
What is the remaining volume (in cubic yards) that still needs to be remediated if the deferral is granted?	1,270
Enter the facility ID on which this deferral should be granted	NA
Enter the well API on which this deferral should be granted	30-025-08491
Contamination does not cause an imminent risk to human health, the environment or groundwater.	True



Figure 4: Deferral area within the bermed tank battery area. Photo is viewing southeast from the northeast corner of the tank battery containment berm. 09/27/2023. GPS: 32.248456 N, 103.511475 W



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Location: Bell Lake Unit #4 1

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When the production site is no longer in use for oil and gas operations, the surface shall be remediated, restored, reclaimed and revegetated per 19.15.29.12 and 19.15.29.13 NMAC. Any State Land Office requirements that provide equal or better protection of fresh water, human health and the environment will be followed.

Please contact me with any questions at 917-497-6890.

Sincerely,

Dimitry Nikanorov
Env. Project Manager
McNabb Partners
c: (917) 497-6890

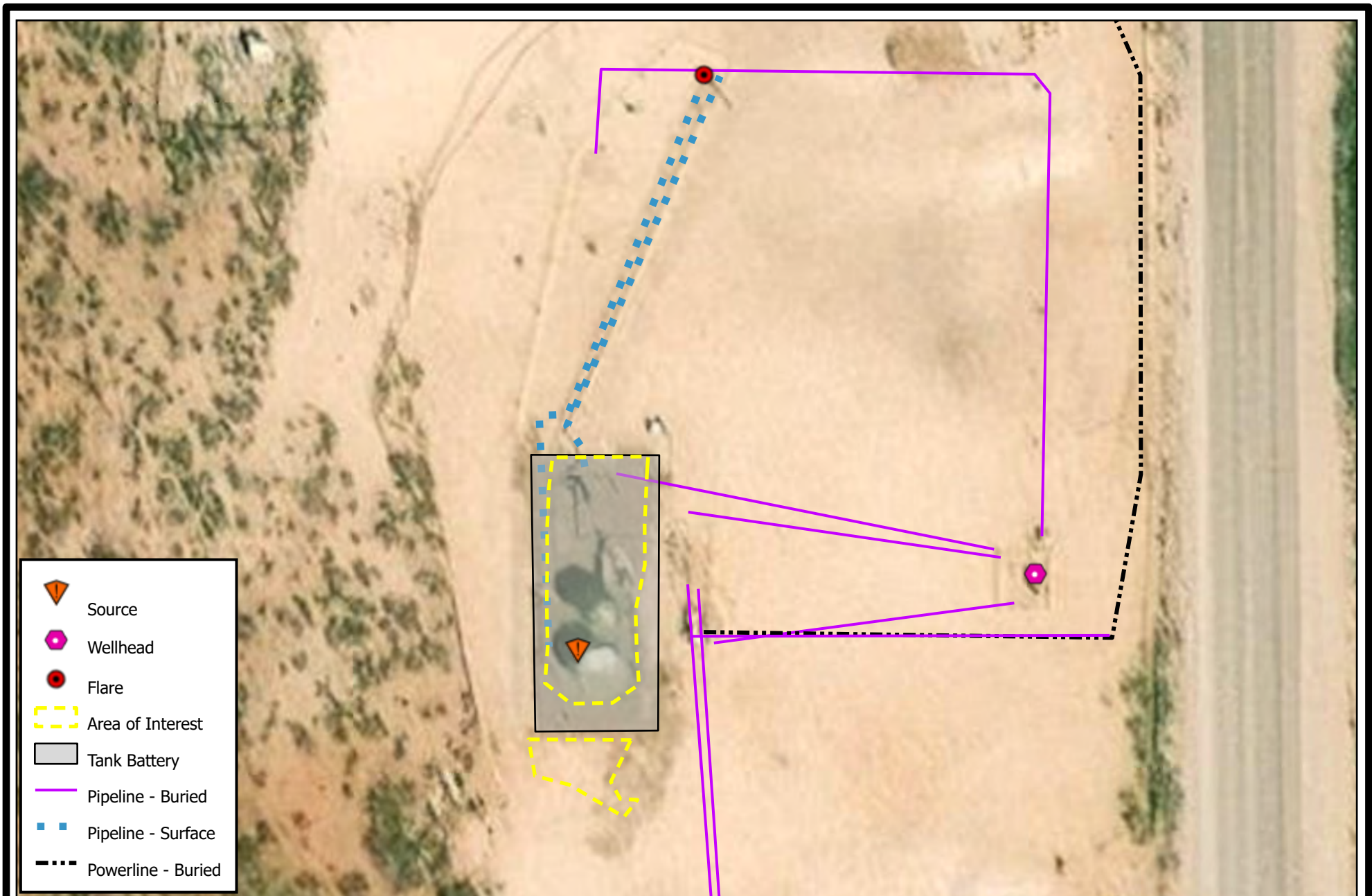


Cc: Kaiser-Francis Oil Company; Hutton Andrew
New Mexico Land Office; SLO-ECO

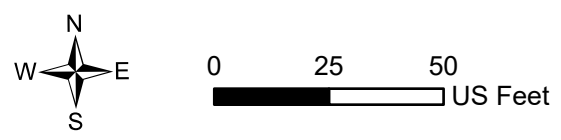
Plates



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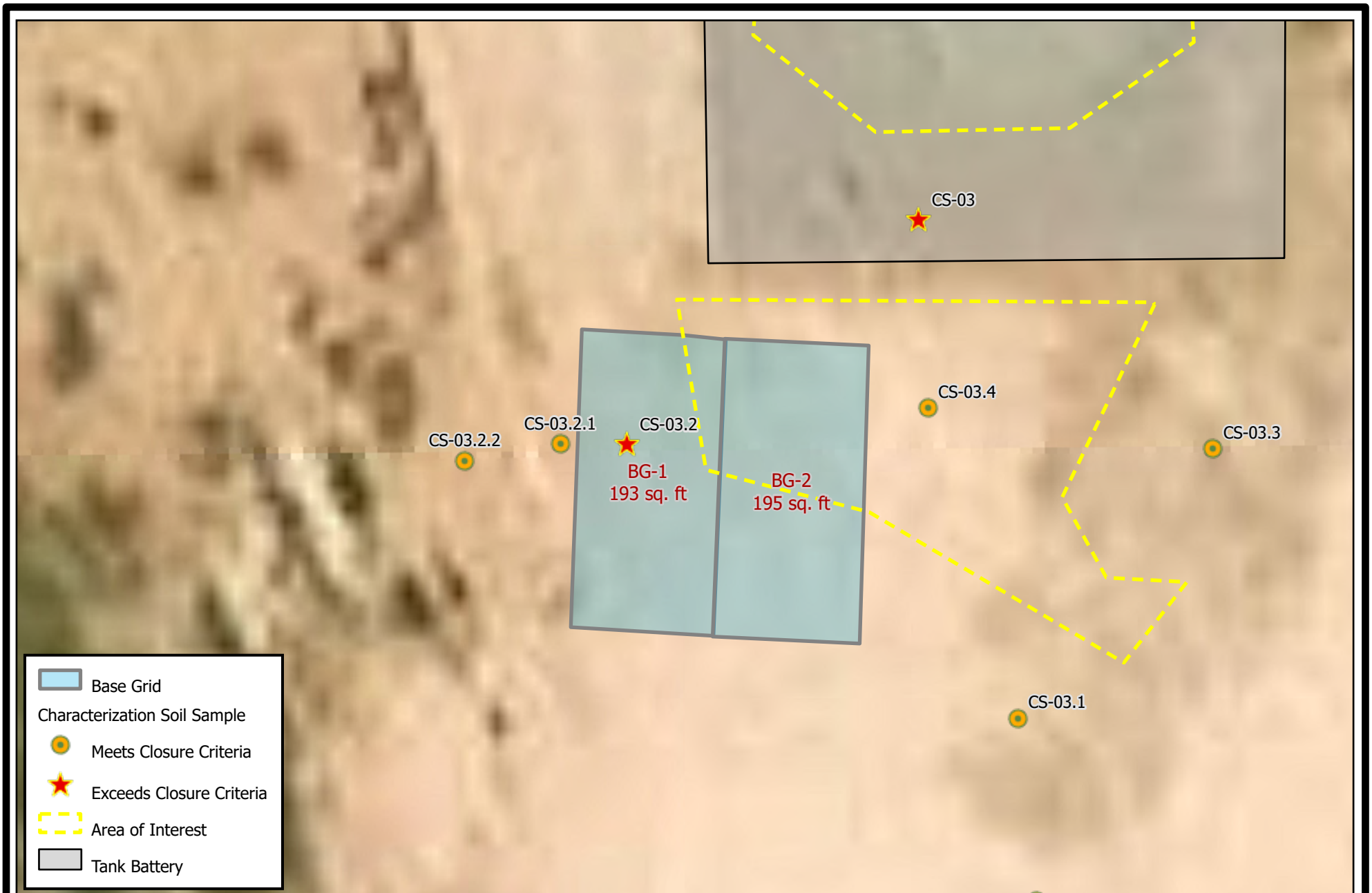
- Source
- Wellhead
- Flare
- Area of Interest
- Tank Battery
- Pipeline - Buried
- Pipeline - Surface
- Powerline - Buried



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Site Map Bell Lake Unit #4 1
Incident #: nAPP2326344306 Proj. ID: 20230916-0830-BellLake4

Plate 1
01/19/2024



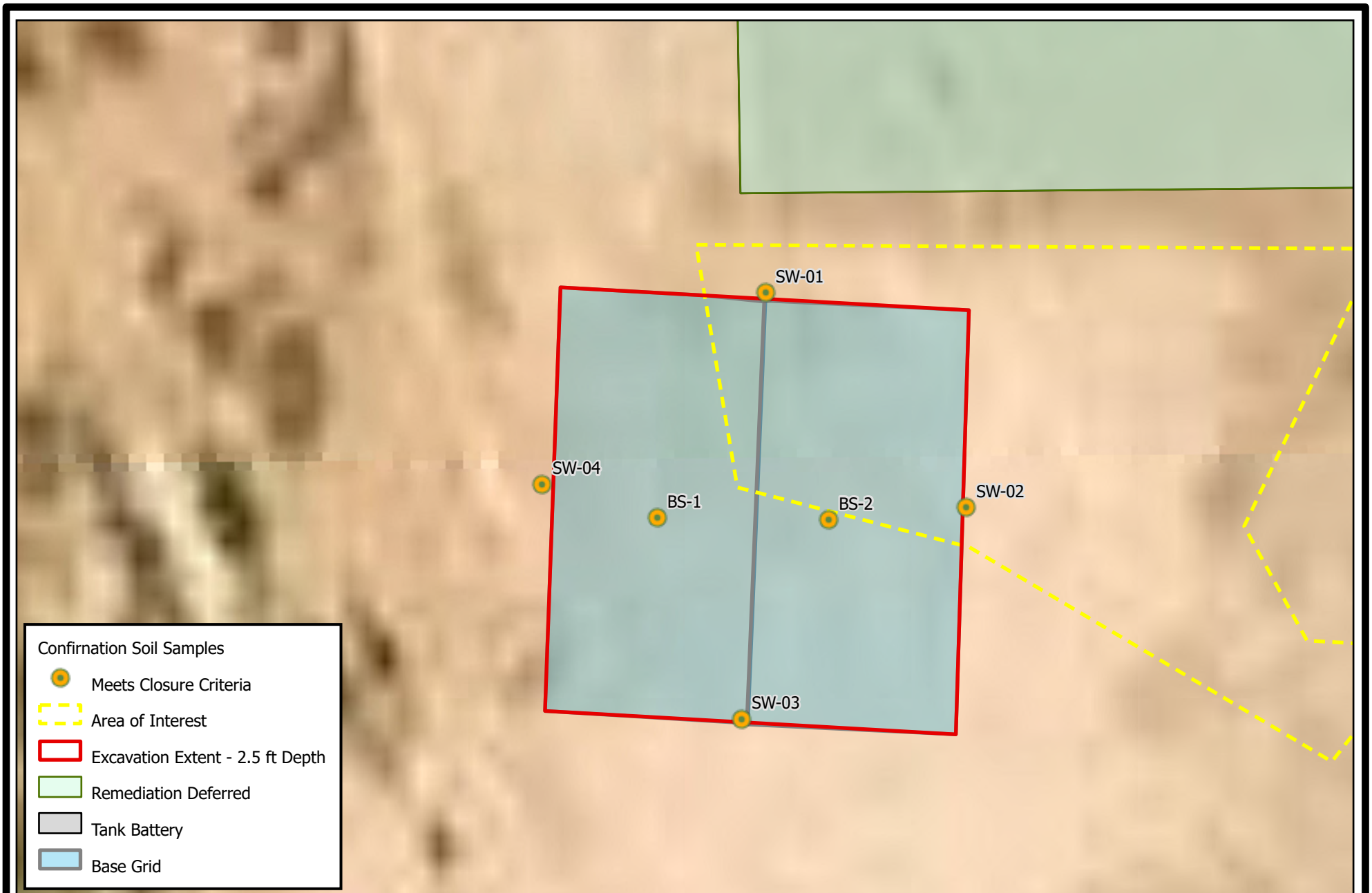
Legend

- Base Grid
- Characterization Soil Sample
- Meets Closure Criteria
- Exceeds Closure Criteria
- Area of Interest
- Tank Battery

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Base Grid with Associated Square Footage Bell Lake Unit #4 1
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Plate 2 05/20/2024



Confirmation Soil Samples

- Meets Closure Criteria
- Area of Interest
- Excavation Extent - 2.5 ft Depth
- Remediation Deferred
- Tank Battery
- Base Grid

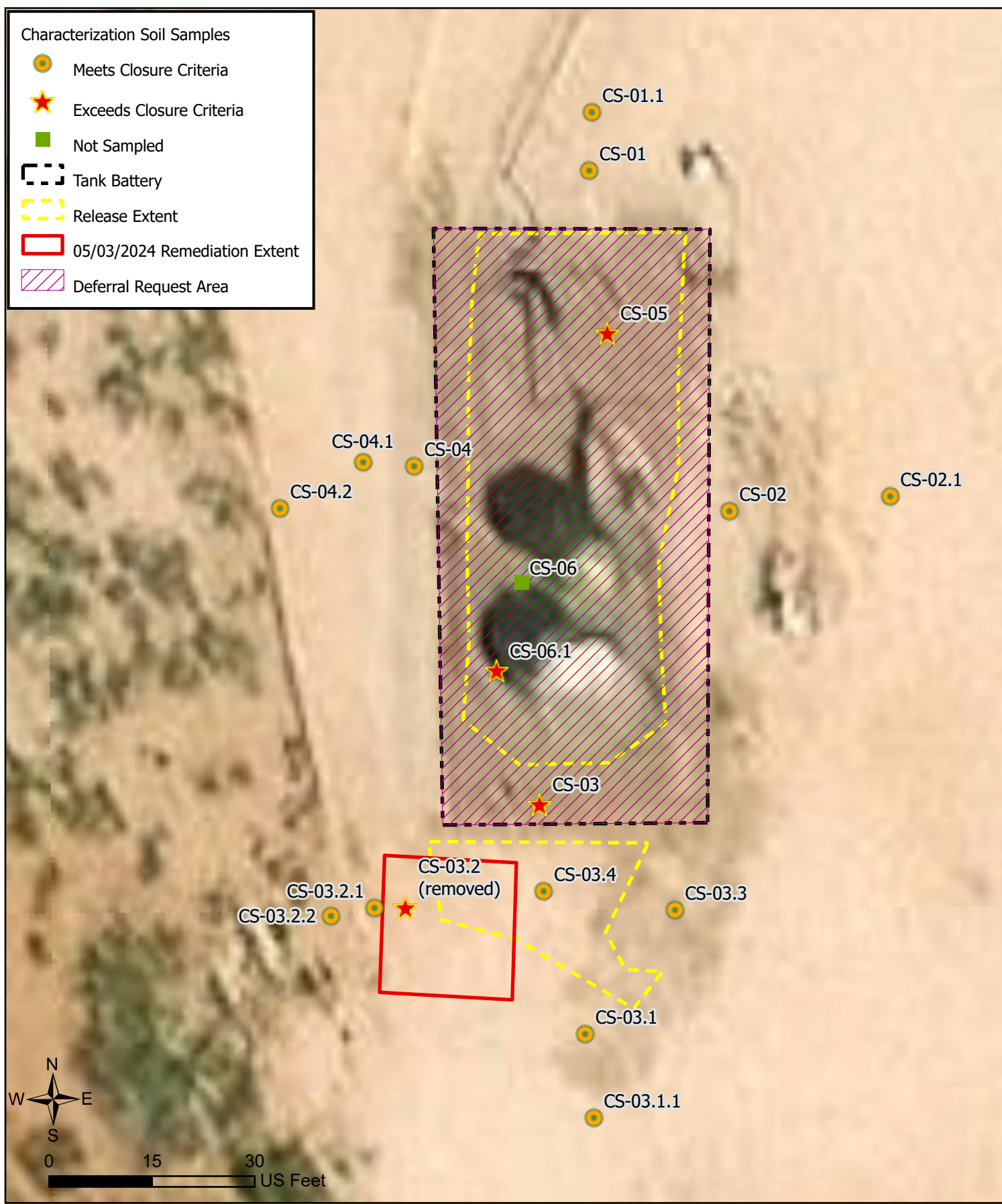
N
W E
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0 3.5 7 US Feet

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Confirmation Sample Points and Excavation Extent Bell Lake Unit #4 1
Incident #: nAPP2326344306 Proj. ID: 20230916-0830-BellLake4

Plate 3
05/20/2024



Remediation Extent and Deferral Request Area
Bell Lake Unit #4 1

Plate 4

Incident #: nAPP2326344306
20230916-0830-BellLake4

05/20/2024

Tables



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May 20, 2024

Table A
Summary of Analytical

Incident ID: nAPP2326344306
Bell Lake Unit #4 1
Project ID: 20230916-0830-BellLake4

Sample ID	Date	Top Depth (Feet)	Bottom Depth (Feet)	Chloride (mg/kg)	GRO+DRO (mg/kg)	TPH Ext. (mg/kg)	Benzene (mg/kg)	BTEX (mg/kg)	Delineation	Comments	Lab	Lab #
NMOCD Closure Criteria												
0 - 4 feet & "not in-use"				600	--	100	10	50				
> 4 ft or "in-use"				10,000	1,000	2,500	10	50				
CS-01	9/27/2023		0	1.75	ND	<117.5	<217.5	ND	ND	Hand Auger Refusal	Envirotech	E309232
CS-01.1	11/15/2023		0	2	240	<20	<30	<0.05	<0.3		Cardinal	H236287
CS-01.1	11/15/2023		2	4	624	<20	<30	<0.05	<0.3		Cardinal	H236287
CS-01.1	11/15/2023		4.1	5	80	<20	<30	<0.05	<0.3		Cardinal	H236287
CS-01.2	12/27/2023		0	1	96	<34	<44	<0.05	<0.3	Horizontal Delineation	Cardinal	H236848
CS-01.2	12/27/2023	1.25			272	<20	<30	<0.05	<0.3	Horizontal Delineation	Cardinal	H236848
CS-02	9/27/2023		0	1.25	649	ND	ND	ND	ND		Envirotech	E309232
CS-02	9/27/2023	1.25			732	ND	ND	ND	ND	Hand Auger Refusal	Envirotech	E309232
CS-02.1	11/15/2023		0	2	896	<20	<30	<0.05	<0.3		Cardinal	H236287
CS-02.1	11/16/2023		2	4	1100	<20	<30	<0.05	<0.3		Cardinal	H236287
CS-02.1	11/16/2023		4.1	4.5	1220	<20	<30	<0.05	<0.3		Cardinal	H236287
CS-02.1	11/16/2023		4.5	5.5	1090	<20	<30	<0.05	<0.3		Cardinal	H236287
CS-02.2	12/6/2023		0	1	688	<20	<30	<0.05	<0.3		Cardinal	H236563
CS-02.2	12/6/2023	2			288	<20	<30	<0.05	<0.3		Cardinal	H236563
CS-02.3	12/27/2023		0	1	32	<20	<30	<0.05	<0.3	Horizontal Delineation	Cardinal	H236848
CS-02.3	12/27/2023	1.25			16	<20	<30	<0.05	<0.3	Horizontal Delineation	Cardinal	H236848
CS-03	9/27/2023		+1	2	29.8	21,550	<21600	8.23	204.13	Deferred - Prod. Equipment	Strong hydrocarbon odor	Envirotech E309232
CS-03	9/27/2023	2.25			546	ND	ND	ND	ND	Deferred - Prod. Equipment	Hand Auger Refusal	Envirotech E309232
CS-03.1	9/27/2023		0	2	275	ND	ND	ND	ND		Envirotech	E309233
CS-03.1	9/27/2023	2.75			660	ND	ND	ND	ND	Hand Auger Refusal	Envirotech	E309233
CS-03.1.1	11/15/2023		0	2	144	<20	<30	<0.05	<0.3	Horizontal Delineation	Cardinal	H236287
CS-03.1.1	11/15/2023		2	4	384	<20	<30	<0.05	<0.3	Horizontal Delineation	Cardinal	H236287
CS-03.1.1	11/15/2023		4.1	5	416	<20	<30	<0.05	<0.3	Horizontal Delineation	Cardinal	H236287
CS-03.2	9/27/2023		0	2	183	ND	ND	ND	ND	Removed	Envirotech	E309233
CS-03.2	9/27/2023	2.25			195	<21175	<22175	11.1	190.8	Removed	Envirotech	E309233
CS-03.2.1	11/15/2023		0	2	272	<20	<30	<0.05	<0.3		Cardinal	H236287
CS-03.2.1	11/15/2023		2	4	1120	<20	<30	<0.05	<0.3		Cardinal	H236287
CS-03.2.1	11/15/2023		4.1	5	832	<20	<30	<0.05	<0.3		Cardinal	H236287
CS-03.2.2	12/6/2023		0	1	48	<20	<30	<0.05	<0.3	Horizontal Delineation	Cardinal	H236563
CS-03.2.2	12/6/2023	1.75			304	<20	<30	<0.05	<0.3	Horizontal Delineation	Cardinal	H236563
CS-03.3	9/27/2023		0	1.6	360	ND	ND	ND	ND		Envirotech	E309233
CS-03.3	9/27/2023	1.6			804	ND	ND	ND	ND		Envirotech	E309233
CS-03.4	9/27/2023		0	1.75	41.3	396.5	<446.5	ND	<2.166	Condensate Odor	Envirotech	E309233
CS-03.4	9/27/2023	1.75			335	<163	<213	ND	ND		Envirotech	E309233
CS-03.4	11/16/2023		0	2	208	<165	<175	<0.05	<0.3		Cardinal	H236287
CS-04	9/27/2023		0	1.25	357	ND	ND	ND	ND		Envirotech	E309232
CS-04	9/27/2023	1.25			702	<192	<458	ND	<0.1122	Hand Auger Refusal	Envirotech	E309232
CS-04.1	11/16/2023		0	2	1060	<22.9	<32.9	<0.05	<0.3		Cardinal	H236287
CS-04.1	11/16/2023		2.1	2.75	1680	<20	<30	<0.05	<0.3	geoprobe refusal	Cardinal	H236287
CS-04.2	12/6/2023		0	1	272	<20	<30	<0.05	<0.3	Horizontal Delineation	Cardinal	H236563
CS-04.2	12/6/2023	1.25			416	<20	<30	<0.05	<0.3	Horizontal Delineation	Cardinal	H236563

May 20, 2024

Table A
Summary of Analytical

Incident ID: nAPP2326344306
Bell Lake Unit #4 1
Project ID: 20230916-0830-BellLake4

Sample ID	Date	(Feet)	Top Depth (Feet)	Bottom Depth (Feet)	Chloride (mg/kg)	GRO+DRO (mg/kg)	TPH Ext. (mg/kg)	Benzene (mg/kg)	BTEX (mg/kg)	Delineation	Comments	Lab	Lab #
NMOCD Closure Criteria													
0 - 4 feet & "not in-use"					600	--	100	10	50				
> 4 ft or "in-use"					10,000	1,000	2,500	10	50				
ROWNE	12/6/2023		0	1	704	<41.8	<55.5	<0.05	<0.3			Cardinal	H236563
ROWNE	12/6/2023	2			768	<36	<46	<0.05	<0.3			Cardinal	H236563
ROWNE 2	12/27/2023		0	1	32	<20	<30	<0.05	<0.3	Horizontal Delineation		Cardinal	H236848
ROWNE 2	12/27/2023	1.5			16	<20	<30	<0.05	<0.3	Horizontal Delineation		Cardinal	H236848
CS-05	9/27/2023		+1	0	NS	NS	NS	NS	NS	Not Sampled.	Hydrocarbon/condensate impact; silt, sand; tank battery		
CS-05	9/27/2023	0			NS	NS	NS	NS	NS	Not Sampled.	Hydrocarbon/condensate impact; grey, black		
CS-05	11/16/2023		+1	0.5	224	6970	6996.7	<0.5	40.8	Deferred - Prod. Equipment	Tank battery base at 1 ft above ground surface	Cardinal	H236287
CS-05	11/16/2023		0.5	1.25	272	9750	9774.3	<0.5	48.9	Deferred - Prod. Equipment	strong hydrocarbon odor	Cardinal	H236287
CS-05	11/16/2023		1.25	1.75	192	2999	3014.8	<0.05	13	Deferred - Prod. Equipment	hydrocarbon odor	Cardinal	H236287
CS-05	11/16/2023		1.75	3.25	256	5150	<5160	<0.05	13.2	Deferred - Prod. Equipment	hydrocarbon odor	Cardinal	H236287
CS-05	11/16/2023		1.75	9.75	NS	NS	NS	NS	NS	Deferred - Prod. Equipment	sweet/sour hydrocarbon odor		
CS-05	11/16/2023	10			352	1877	1926.7	<0.05	3	Deferred - Prod. Equipment	slight hydrocarbon odor	Cardinal	H236287
CS-05	11/16/2023	13			128	<20	<30	<0.05	<0.3	Deferred - Prod. Equipment	slight hydrocarbon odor	Cardinal	H236287
CS-05	11/16/2023		14	16.5	NS	NS	NS	NS	NS	Deferred - Prod. Equipment	no hydrocarbon odor		
CS-05	11/16/2023	16			352	<20	<30	<0.05	<0.3	Deferred - Prod. Equipment	no hydrocarbon odor	Cardinal	H236287
CS-06	9/27/2023		+1	0	NS	NS	NS	NS	NS	Not Sampled. Production Equipment.	Hydrocarbon impact; grey, black		
CS-06.1	11/16/2023		+1	1	400	9830	9921.1	<0.5	85.6	Deferred - Prod. Equipment	Tank battery base at 1 ft above ground surface	Cardinal	H236287
CS-06.1	11/16/2023		1	1.25	288	11030	11052.1	<1	64.1	Deferred - Prod. Equipment	strong hydrocarbon odor	Cardinal	H236287
CS-06.1	11/16/2023		2.25	3.75	144	4961	<4971	<0.05	9.43	Deferred - Prod. Equipment	hydrocarbon odor	Cardinal	H236287
CS-06.1	11/16/2023	3.75			NS	NS	NS	NS	NS	Deferred - Prod. Equipment	hydrocarbon odor		
CS-06.1	11/16/2023		3.75	5.75	384	5670	<5680	<0.05	10.8	Deferred - Prod. Equipment	hydrocarbon odor	Cardinal	H236287
CS-06.1	11/16/2023		5.75	6.25	240	2764	<2774	<0.05	4.4	Deferred - Prod. Equipment	hydrocarbon odor	Cardinal	H236287
CS-06.1	11/16/2023		6.25	10	NS	NS	NS	NS	NS	Deferred - Prod. Equipment	hydrocarbon odor		
CS-06.1	11/16/2023		10.25	12.25	NS	NS	NS	NS	NS	Deferred - Prod. Equipment	slight hydrocarbon odor		
CS-06.1	11/16/2023		12.25	14.25	NS	NS	NS	NS	NS	Deferred - Prod. Equipment	no hydrocarbon odor		
CS-06.1	11/16/2023	14			448	<20	<30	<0.05	<0.3	Deferred - Prod. Equipment		Cardinal	H236287
BS-01	5/3/2024	2.5			304	<20	<30	<0.05	<0.3		Base confirmation	Cardinal	H242410-01
BS-02	5/3/2024	2.5			64	<20	<30	<0.05	<0.3		Base confirmation	Cardinal	H242410-02
SW-01	5/3/2024		0	2.5	64	<20	<30	<0.05	<0.3		Side Wall confirmation	Cardinal	H242410-03
SW-02	5/3/2024		0	2.5	48	<20	<30	<0.05	<0.3		Side Wall confirmation	Cardinal	H242410-04
SW-03	5/3/2024		0	2.5	48	<20	<30	<0.05	<0.3		Side Wall confirmation	Cardinal	H242410-05
SW-04	5/3/2024		0	2.5	32	<20	<30	<0.05	<0.3		Side Wall confirmation	Cardinal	H242410-06
BACKFILL-1	5/14/2024				176	<20	<30	<0.05	<0.3		Backfill Material	Cardinal	H242628-01
Notes:													
Exceed Closure Criteria for on-site use													
+1 represents one-foot above production pad surface. I.E. tank battery ground surface is one-foot above production pad surface.													
NS = Not Sampled													

Appendix A

Communications



McNabb Partners, LLC
Hobbs • Carlsbad • Midland

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	nAPP2326344306
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party: Kaiser-Francis Oil Company	OGRID: 12361
Contact Name: Hutton Andrew	Contact Telephone: 918-491-4615
Contact email: Huttona@kfoc.net	Incident # (assigned by OCD) nAPP2326344306
Contact mailing address: PO Box 21468 Tulsa, OK 74121-146	

Location of Release Source

Latitude 32.2483309 _____ Longitude -103.5115732 _____
(NAD 83 in decimal degrees to 5 decimal places)

Site Name Bell Lake Unit #4 1	Site Type Tank Battery
Date Release Discovered 09/16/2023	API# (if applicable) 30-025-08491

Unit Letter	Section	Township	Range	County
F	6	24S	34E	Lea

Surface Owner: State Federal Tribal Private (Name: _____)

Nature and Volume of Release

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

<input checked="" type="checkbox"/> Crude Oil	Volume Released (bbls) 4.4	Volume Recovered (bbls) 3.6
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 17.4	Volume Recovered (bbls) 14.4
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release Failure of solenoid on gas line to tank battery causing south tank to overflow into tank battery containment.

State of New Mexico
Oil Conservation Division

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Incident ID	nAPP2326344306
District RP	
Facility ID	
Application ID	

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

Initial Response

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

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.
If all the actions described above have <u>not</u> been undertaken, explain why:
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.
Printed Name: <u>Hutton Andrew</u> Title: <u>EHS Lead</u> Signature: _____ Date: _____ email: <u>huttona@kfoc.net</u> Telephone: <u>918-491-4615</u>
<u>OCD Only</u> Received by: _____ Date: _____

Spill Dimensions to Volume of Release			
Input	volume of affected soil	[feet^3]	971.50
Input	Porosity: typically is .35 to .40 for most soils	[-]	0.35
Input	Proportion of porosity filled with release fluid [0,1]	[-]	0.36
Output	volume of fluid	[feet^3]	122.4
		[gal]	915.7
		Barrels	21.8

From GIS	
Sq. Ft	1943
Depth (ft)	0.5
Cu. Ft	971.5

Total Release Volume	Barrels	21.8
Produced Water (80%)	Barrels	17.4
Crude Oil (20%)	Barrels	4.4

Total Recovered Volume	Barrels	18.0
Produced Water (80%)	Barrels	14.4
Crude Oil (20%)	Barrels	3.6

Laura Parker

From: Wells, Shelly, EMNRD <Shelly.Wells@emnrd.nm.gov>
Sent: Monday, November 13, 2023 9:15 AM
To: Andrew Parker; 'spills@slo.state.nm.us'
Cc: Hutton Andrew; EHSDB; Laura Parker; Chris Turner; Velez, Nelson, EMNRD; Bratcher, Michael, EMNRD
Subject: RE: [EXTERNAL] 2-Day Sampling Notice nAPP2326344306 Bell Lake Unit #4 1

Good morning Andrew,

The OCD has received your notification. Include a copy of this and all notifications in the remedial and/or closure reports to ensure the notifications are documented in the project file.

Thank you,

Shelly

Shelly Wells * Environmental Specialist-Advanced
Environmental Bureau
EMNRD-Oil Conservation Division
1220 S. St. Francis Drive | Santa Fe, NM 87505
(505)469-7520 | Shelly.Wells@emnrd.nm.gov
<http://www.emnrd.state.nm.us/OCD/>

From: Andrew Parker <andrew@mcnabbpartners.com>
Sent: Friday, November 10, 2023 6:09 AM
To: Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>; 'spills@slo.state.nm.us' <spills@slo.state.nm.us>
Cc: Hutton Andrew <Huttona@kfoc.net>; EHSDB <EHSDB@kfoc.net>; Laura Parker <laura@mcnabbpartners.com>; Chris Turner <chris@mcnabbpartners.com>
Subject: [EXTERNAL] 2-Day Sampling Notice nAPP2326344306 Bell Lake Unit #4 1

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

NMOCD/SLO:

Please accept this email as the 2-day confirmation sampling notice per 19.15.29 NMAC for Incident # nAPP2326344306. We will continue conducting the horizontal and vertical delineations. Soil sampling will begin on Thursday November 16th.

Thank you,

Andrew Parker
Environmental Manager
McNabb Partners
c: (970) 570-9535



From: Rodgers, Scott, EMNRD <Scott.Rodgers@emnrd.nm.gov>
Sent: Thursday, September 21, 2023 4:18 PM
To: Andrew Parker <andrew@mcnabbpartners.com>; 'spills@slo.state.nm.us' <spills@slo.state.nm.us>; Velez, Nelson, EMNRD <Nelson.Velez@emnrd.nm.gov>; Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>
Cc: Hutton Andrew <Huttona@kfoc.net>; EHSDB <EHSDB@kfoc.net>
Subject: RE: [EXTERNAL] 48 Hour Sampling Notice nAPP2326344306 Bell Lake Unit #4 1

The OCD has received your notification. Include a copy of this and all notifications in the remedial and/or closure reports to ensure the notifications are documented in the project file.

Scott Rodgers • Environmental Specialist
 Environmental Bureau
 EMNRD - Oil Conservation Division
 8801 Horizon Blvd. NE, Suite 260 | Albuquerque, NM 87113
 505.469.1830 | scott.rodgers@emnrd.nm.gov
<http://www.emnrd.nm.gov/oed>



From: Andrew Parker <andrew@mcnabbpartners.com>
Sent: Thursday, September 21, 2023 3:28 PM
To: Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>; 'spills@slo.state.nm.us' <spills@slo.state.nm.us>
Cc: Hutton Andrew <Huttona@kfoc.net>; EHSDB <EHSDB@kfoc.net>
Subject: [EXTERNAL] 48 Hour Sampling Notice nAPP2326344306 Bell Lake Unit #4 1

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

NMOCD/SLO:

Please accept this email as the 48-hour sampling notice for Incident Number nAPP2326344306 for the release at Bell Lake Unit #4 1. Characterization sampling is scheduled for Wednesday September 27. Characterization samples may be used for closure confirmation samples.

Please contact me with any questions.

Andrew Parker
 Environmental Manager
 McNabb Partners
 c: (970) 570-9535



From: OCDOnline@state.nm.us <OCDOnline@state.nm.us>
Sent: Thursday, September 21, 2023 12:26 PM
To: Hutton Andrew <Huttona@kfoc.net>
Subject: [EXTERNAL] The Oil Conservation Division (OCD) has approved the application, Application ID: 267607

To whom it may concern (c/o Hutton Andrew for KAISER-FRANCIS OIL CO),

The OCD has approved the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nAPP2326344306, with the following conditions:

- None

The signed C-141 can be found in the OCD Online: Imaging under the incident ID (n#).

If you have any questions regarding this application, please contact me.

Thank you,
Scott Rodgers
Environmental Specialist – A
505-469-1830
scott.rodgers@emnrd.nm.gov

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

From: [Velez, Nelson, EMNRD](#)
To: [Andrew Parker](#)
Cc: [EHSDB@kfoc.net](#); [RamonR@kfoc.net](#); [Hutton Andrew](#); [Bratcher, Michael, EMNRD](#)
Subject: Re: [EXTERNAL] napp2326344306 Bell Lake #4 1 Extension Request
Date: Tuesday, December 19, 2023 11:24:31 AM
Attachments: [image.png](#)
[Outlook-kvpdwwah.png](#)

Good afternoon Andrew,

Your 60-day time extension request is approved. Remediation Due date has been updated to February 13, 2024.

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

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

Regards,

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



Previous email submittal:

From: Andrew Parker <andrew@mcnabbpartners.com>
Sent: Friday, December 15, 2023 8:22 AM
To: Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>
Cc: EHSDB <EHSDB@kfoc.net>; Hutton Andrew <Huttona@kfoc.net>; Ramon Rodriguez <RamonR@kfoc.net>
Subject: [EXTERNAL] napp2326344306 Bell Lake #4 1 Extension Request

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

NMOCD:

On the behalf of Kaiser-Francis Oil Company, McNabb Partners respectfully asks NMOCD for a 60-day extension for Incident # nAPP2326344306 for the submission of the Characterization Report and Remediation Plan. Soil sampling for horizontal delineation along the north and east edges of the release extent exhibit chloride concentrations >600 mg/kg on the active production pad in-use for oil and gas operations. Vertical delineation within the release extend was completed during the November 2023 sampling event. Horizontal delineation sampling will require off-site surface disturbance. Per State Land Office (surface owner) requirements, an ARMS Review or cultural survey is required for any new surface disturbance. We will begin the ARMS Review immediately.

The Characterization and Remediation Plan will be submitted no later than 02/13/2024.

Thank you,

Andrew Parker
Environmental Manager
McNabb Partners
c: (970) 570-9535



From: Wells, Shelly, EMNRD <Shelly.Wells@emnrd.nm.gov>
Sent: Friday, December 15, 2023 9:21 AM
To: Velez, Nelson, EMNRD <Nelson.Velez@emnrd.nm.gov>
Cc: Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>
Subject: FW: [EXTERNAL] napp2326344306 Bell Lake #4 1 Extension Request

From: Andrew Parker <andrew@mcnabbpartners.com>
Sent: Friday, December 15, 2023 8:22 AM
To: Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>
Cc: EHSDB <EHSDB@kfoc.net>; Hutton Andrew <Huttona@kfoc.net>; Ramon Rodriguez <RamonR@kfoc.net>
Subject: [EXTERNAL] napp2326344306 Bell Lake #4 1 Extension Request

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

NMOCD:

On the behalf of Kaiser-Francis Oil Company, McNabb Partners respectfully asks NMOCD for a 60-day extension for Incident # nAPP2326344306 for the submission of the Characterization Report and Remediation Plan. Soil sampling for horizontal delineation along the north and east edges of the release extent exhibit chloride concentrations >600 mg/kg on the active production pad in-use for oil and gas operations. Vertical delineation within the release extend was completed during the November 2023 sampling event. Horizontal delineation sampling will require off-site surface disturbance. Per State Land Office (surface owner) requirements, an ARMS Review or cultural survey is required for any new surface disturbance. We will begin the ARMS Review immediately.

The Characterization and Remediation Plan will be submitted no later than 02/13/2024.

Thank you,

Andrew Parker
Environmental Manager
McNabb Partners
c: (970) 570-9535



Andrew Parker

From: Hutton Andrew <Huttona@kfoc.net>
Sent: Thursday, December 21, 2023 11:19 AM
To: Andrew Parker
Subject: FW: [EXTERNAL] The Oil Conservation Division (OCD) has accepted the application, Application ID: 297022

Hutton Andrew
EHS Lead
Kaiser-Francis Oil Company
C: 580.307.7363
O: 918.491.4615

From: OCDOnline@state.nm.us <OCDOnline@state.nm.us>
Sent: Thursday, December 21, 2023 12:17 PM
To: Hutton Andrew <Huttona@kfoc.net>
Subject: [EXTERNAL] The Oil Conservation Division (OCD) has accepted the application, Application ID: 297022

To whom it may concern (c/o Hutton Andrew for KAISER-FRANCIS OIL CO),

The OCD has received the submitted *Notification for (Final) Sampling of a Release (C-141N)*, for incident ID (n#) nAPP2326344306.

The sampling event is expected to take place:

When: 12/27/2023 @ 09:00
Where: F-06-24S-34E 1980 FNL 1980 FWL (32.2484093,-103.5110703)

Additional Information: Christopher Turner 575-441-0080

Additional Instructions: NA

An OCD representative may be available onsite at the date and time reported. In the absence or presence of an OCD representative, sampling pursuant to 19.15.29.12.D NMAC is required. Sampling must be performed following an approved sampling plan or pursuant to 19.15.29.12.D.(1).(c) NMAC. Should there be a change in the scheduled date and time of the sampling event, then another notification should be resubmitted through OCD permitting as soon as possible.

- **Failure to notify the OCD of sampling events including any changes in date/time per the requirements of 19.15.29.12.D.(1).(a) NMAC, may result in the remediation closure samples not being accepted.**

If you have any questions regarding this application, or don't know why you have received this email, please contact us.

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

From: OCDOnline@state.nm.us
To: [Andrew Parker](#)
Subject: The Oil Conservation Division (OCD) has approved the application, Application ID: 311921
Date: Friday, April 5, 2024 2:50:09 PM

To whom it may concern (c/o Andrew Parker for KAISER-FRANCIS OIL CO),

The OCD has approved the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nAPP2326344306, with the following conditions:

- **Remediation Plan is approved as written. Kaiser-Francis has 90-days (July 5, 2024) to submit to OCD its appropriate or final remediation closure report.**

The signed C-141 can be found in the OCD Online: Imaging under the incident ID (n#).

If you have any questions regarding this application, please contact me.

Thank you,
Nelson Velez
Environmental Specialist - Advanced
505-469-6146
Nelson.Velez@emnrd.nm.gov

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

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 297022

QUESTIONS

Operator: KAISER-FRANCIS OIL CO PO Box 21468 Tulsa, OK 74121146	OGRID: 12361
	Action Number: 297022
	Action Type: [NOTIFY] Notification Of Sampling (C-141N)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2326344306
Incident Name	NAPP2326344306 BELL LAKE UNIT #4 1 @ 30-025-08491
Incident Type	Produced Water Release
Incident Status	Initial C-141 Approved
Incident Well	[30-025-08491] BELL LAKE UNIT 1 #004

Location of Release Source

Site Name	BELL LAKE UNIT #4 1
Date Release Discovered	09/16/2023
Surface Owner	State

Sampling Event General Information

Please answer all the questions in this group.

What is the sampling surface area in square feet	400
What is the estimated number of samples that will be gathered	2
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	12/27/2023
Time sampling will commence	09:00 AM
Please provide any information necessary for observers to contact samplers	Christopher Turner 575-441-0080
Please provide any information necessary for navigation to sampling site	NA

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

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

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

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

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

CONDITIONS

Action 297022

CONDITIONS

Operator: KAISER-FRANCIS OIL CO PO Box 21468 Tulsa, OK 74121146	OGRID: 12361
	Action Number: 297022
	Action Type: [NOTIFY] Notification Of Sampling (C-141N)

CONDITIONS

Created By	Condition	Condition Date
huttona	Failure to notify the OCD of sampling events including any changes in date/time per the requirements of 19.15.29.12.D.(1).(a) NMAC, may result in the remediation closure samples not being accepted.	12/21/2023

From: [Laura Parker](#)
To: eco@slo.state.nm.us
Cc: [Andrew Parker](#); [Dimitry Nikanorov](#)
Subject: Sampling Notification_ Bell Lake Unit #4 1 (nAPP2326344306) 09-16-2023
Date: Tuesday, April 30, 2024 11:45:34 AM
Attachments: [2024.05.03 Sampling notification to NMOCD.pdf](#)

Please be advised of sample notification for above site, see attached NMOCD notification.

Please let me know if you have any questions.

Laura Parker
Environmental Specialist
McNabb Partners
c: (505) 270-8647



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 339022

QUESTIONS

Operator: KAISER-FRANCIS OIL CO PO Box 21468 Tulsa, OK 74121146	OGRID: 12361
	Action Number: 339022
	Action Type: [NOTIFY] Notification Of Sampling (C-141N)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2326344306
Incident Name	NAPP2326344306 BELL LAKE UNIT #4 1 @ 30-025-08491
Incident Type	Produced Water Release
Incident Status	Deferral Request Approved
Incident Well	[30-025-08491] BELL LAKE UNIT 1 #004

Location of Release Source	
Site Name	BELL LAKE UNIT #4 1
Date Release Discovered	09/16/2023
Surface Owner	State

Sampling Event General Information	
<i>Please answer all the questions in this group.</i>	
What is the sampling surface area in square feet	200
What is the estimated number of samples that will be gathered	4
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	05/03/2024
Time sampling will commence	08:00 AM
Please provide any information necessary for observers to contact samplers	Please contact dimitry@mcnabbpartners.com if needed. 917-497-6890
Please provide any information necessary for navigation to sampling site	GPS coordinates: 32.248203, -103.511589

District I
 1625 N. French Dr., Hobbs, NM 88240
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 811 S. First St., Artesia, NM 88210
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 Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS

Action 339022

CONDITIONS

Operator: KAISER-FRANCIS OIL CO PO Box 21468 Tulsa, OK 74121146	OGRID: 12361
	Action Number: 339022
	Action Type: [NOTIFY] Notification Of Sampling (C-141N)

CONDITIONS

Created By	Condition	Condition Date
aparkerm	Failure to notify the OCD of sampling events including any changes in date/time per the requirements of 19.15.29.12.D.(1).(a) NMAC, may result in the remediation closure samples not being accepted.	4/30/2024

Appendix B

Certificates of Analysis



McNabb Partners, LLC
Hobbs • Carlsbad • Midland



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

May 09, 2024

ANDREW PARKER
MC NABB SERVICES
P. O. BOX 5753
HOBBS, NM 88240

RE: BELL LAKE #4 - 1

Enclosed are the results of analyses for samples received by the laboratory on 05/03/24 13:17.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-23-16. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

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

Celey D. Keene
Lab Director/Quality Manager



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

Analytical Results For:

MC NABB SERVICES
 ANDREW PARKER
 P. O. BOX 5753
 HOBBS NM, 88240
 Fax To: (575) 391-8484

Received:	05/03/2024	Sampling Date:	05/03/2024
Reported:	05/09/2024	Sampling Type:	Soil
Project Name:	BELL LAKE #4 - 1	Sampling Condition:	Cool & Intact
Project Number:	20230916-0830-BELLLAKE4	Sample Received By:	Shalyn Rodriguez
Project Location:	LEA CO., NM		

Sample ID: BS - 01 (2.5') (H242410-01)

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/06/2024	ND	1.88	93.8	2.00	6.28	
Toluene*	<0.050	0.050	05/06/2024	ND	1.85	92.5	2.00	6.26	
Ethylbenzene*	<0.050	0.050	05/06/2024	ND	1.82	91.0	2.00	5.78	
Total Xylenes*	<0.150	0.150	05/06/2024	ND	5.35	89.2	6.00	5.75	
Total BTEX	<0.300	0.300	05/06/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 91.7 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	304	16.0	05/07/2024	ND	432	108	400	0.00	QM-07

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/06/2024	ND	209	104	200	0.521	
DRO >C10-C28*	<10.0	10.0	05/06/2024	ND	211	105	200	0.307	
EXT DRO >C28-C36	<10.0	10.0	05/06/2024	ND					

Surrogate: 1-Chlorooctane 123 % 48.2-134

Surrogate: 1-Chlorooctadecane 124 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

MC NABB SERVICES
 ANDREW PARKER
 P. O. BOX 5753
 HOBBS NM, 88240
 Fax To: (575) 391-8484

Received:	05/03/2024	Sampling Date:	05/03/2024
Reported:	05/09/2024	Sampling Type:	Soil
Project Name:	BELL LAKE #4 - 1	Sampling Condition:	Cool & Intact
Project Number:	20230916-0830-BELLLAKE4	Sample Received By:	Shalyn Rodriguez
Project Location:	LEA CO., NM		

Sample ID: BS - 02 (2.5') (H242410-02)

BTEX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	05/06/2024	ND	1.88	93.8	2.00	6.28		
Toluene*	<0.050	0.050	05/06/2024	ND	1.85	92.5	2.00	6.26		
Ethylbenzene*	<0.050	0.050	05/06/2024	ND	1.82	91.0	2.00	5.78		
Total Xylenes*	<0.150	0.150	05/06/2024	ND	5.35	89.2	6.00	5.75		
Total BTEX	<0.300	0.300	05/06/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 91.5 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	64.0	16.0	05/07/2024	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10*	<10.0	10.0	05/06/2024	ND	209	104	200	0.521		
DRO >C10-C28*	10.2	10.0	05/06/2024	ND	211	105	200	0.307		
EXT DRO >C28-C36	<10.0	10.0	05/06/2024	ND						

Surrogate: 1-Chlorooctane 125 % 48.2-134

Surrogate: 1-Chlorooctadecane 129 % 49.1-148

Cardinal Laboratories

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

MC NABB SERVICES
 ANDREW PARKER
 P. O. BOX 5753
 HOBBS NM, 88240
 Fax To: (575) 391-8484

Received:	05/03/2024	Sampling Date:	05/03/2024
Reported:	05/09/2024	Sampling Type:	Soil
Project Name:	BELL LAKE #4 - 1	Sampling Condition:	Cool & Intact
Project Number:	20230916-0830-BELLLAKE4	Sample Received By:	Shalyn Rodriguez
Project Location:	LEA CO., NM		

Sample ID: SW - 01 (0-2.5') (H242410-03)

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/06/2024	ND	1.88	93.8	2.00	6.28	
Toluene*	<0.050	0.050	05/06/2024	ND	1.85	92.5	2.00	6.26	
Ethylbenzene*	<0.050	0.050	05/06/2024	ND	1.82	91.0	2.00	5.78	
Total Xylenes*	<0.150	0.150	05/06/2024	ND	5.35	89.2	6.00	5.75	
Total BTEX	<0.300	0.300	05/06/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 90.7 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	05/07/2024	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/06/2024	ND	209	104	200	0.521	
DRO >C10-C28*	<10.0	10.0	05/06/2024	ND	211	105	200	0.307	
EXT DRO >C28-C36	<10.0	10.0	05/06/2024	ND					

Surrogate: 1-Chlorooctane 115 % 48.2-134

Surrogate: 1-Chlorooctadecane 117 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

MC NABB SERVICES
 ANDREW PARKER
 P. O. BOX 5753
 HOBBS NM, 88240
 Fax To: (575) 391-8484

Received:	05/03/2024	Sampling Date:	05/03/2024
Reported:	05/09/2024	Sampling Type:	Soil
Project Name:	BELL LAKE #4 - 1	Sampling Condition:	Cool & Intact
Project Number:	20230916-0830-BELLLAKE4	Sample Received By:	Shalyn Rodriguez
Project Location:	LEA CO., NM		

Sample ID: SW - 02 (0-2.5') (H242410-04)

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/06/2024	ND	1.88	93.8	2.00	6.28	
Toluene*	<0.050	0.050	05/06/2024	ND	1.85	92.5	2.00	6.26	
Ethylbenzene*	<0.050	0.050	05/06/2024	ND	1.82	91.0	2.00	5.78	
Total Xylenes*	<0.150	0.150	05/06/2024	ND	5.35	89.2	6.00	5.75	
Total BTEX	<0.300	0.300	05/06/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 91.1 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	05/07/2024	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/06/2024	ND	209	104	200	0.521	
DRO >C10-C28*	<10.0	10.0	05/06/2024	ND	211	105	200	0.307	
EXT DRO >C28-C36	<10.0	10.0	05/06/2024	ND					

Surrogate: 1-Chlorooctane 121 % 48.2-134

Surrogate: 1-Chlorooctadecane 121 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

MC NABB SERVICES
 ANDREW PARKER
 P. O. BOX 5753
 HOBBS NM, 88240
 Fax To: (575) 391-8484

Received:	05/03/2024	Sampling Date:	05/03/2024
Reported:	05/09/2024	Sampling Type:	Soil
Project Name:	BELL LAKE #4 - 1	Sampling Condition:	Cool & Intact
Project Number:	20230916-0830-BELLLAKE4	Sample Received By:	Shalyn Rodriguez
Project Location:	LEA CO., NM		

Sample ID: SW - 03 (0-2.5') (H242410-05)

BTEX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	05/06/2024	ND	1.88	93.8	2.00	6.28		
Toluene*	<0.050	0.050	05/06/2024	ND	1.85	92.5	2.00	6.26		
Ethylbenzene*	<0.050	0.050	05/06/2024	ND	1.82	91.0	2.00	5.78		
Total Xylenes*	<0.150	0.150	05/06/2024	ND	5.35	89.2	6.00	5.75		
Total BTEX	<0.300	0.300	05/06/2024	ND						

Surrogate: 4-Bromofluorobenzene (PID) 92.1 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	48.0	16.0	05/07/2024	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10*	<10.0	10.0	05/06/2024	ND	200	100	200	3.08		
DRO >C10-C28*	<10.0	10.0	05/06/2024	ND	200	99.9	200	4.15		
EXT DRO >C28-C36	<10.0	10.0	05/06/2024	ND						

Surrogate: 1-Chlorooctane 110 % 48.2-134

Surrogate: 1-Chlorooctadecane 136 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

MC NABB SERVICES
 ANDREW PARKER
 P. O. BOX 5753
 HOBBS NM, 88240
 Fax To: (575) 391-8484

Received:	05/03/2024	Sampling Date:	05/03/2024
Reported:	05/09/2024	Sampling Type:	Soil
Project Name:	BELL LAKE #4 - 1	Sampling Condition:	Cool & Intact
Project Number:	20230916-0830-BELLLAKE4	Sample Received By:	Shalyn Rodriguez
Project Location:	LEA CO., NM		

Sample ID: SW - 04 (0-2.5') (H242410-06)

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/06/2024	ND	1.88	93.8	2.00	6.28	
Toluene*	<0.050	0.050	05/06/2024	ND	1.85	92.5	2.00	6.26	
Ethylbenzene*	<0.050	0.050	05/06/2024	ND	1.82	91.0	2.00	5.78	
Total Xylenes*	<0.150	0.150	05/06/2024	ND	5.35	89.2	6.00	5.75	
Total BTEX	<0.300	0.300	05/06/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 90.7 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	05/07/2024	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/06/2024	ND	200	100	200	3.08	
DRO >C10-C28*	<10.0	10.0	05/06/2024	ND	200	99.9	200	4.15	
EXT DRO >C28-C36	<10.0	10.0	05/06/2024	ND					

Surrogate: 1-Chlorooctane 106 % 48.2-134

Surrogate: 1-Chlorooctadecane 129 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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

Notes and Definitions

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

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Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

Company Name: McNabb Partners		BILL TO		ANALYSIS REQUEST														
Project Manager: Dimitry Nikaev		P.O. #:																
Address:		Company: McNabb																
City: Hobbs State: NM Zip: 88240		Attn: Andrew Parker																
Phone #: 917 497 6890 Fax #:		Address:																
Project #: Project Owner:		City:																
Project Name: Bell Lake #41		State: Zip:																
Project Location: Lee Co, NM		Phone #:																
Sampler Name: Dimitry Nikaev		Fax #:																
FOR LAB USE ONLY																		
Lab I.D.	Sample I.D.	(GIRAB OR) (C) (IMP. #) CONTAINERS	MATRIX	PRESERV.	SAMPLING													
		GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER	ACID/BASE	ICE / COOL	OTHER	DATE	TIME						
H24246	BS-01 (2.5')	6		X				X			5/3/24	0930	BTEX	TPH	Chloride			
1	BS-02 (2.5')											1000						
2	SW-01 (0-2.5')											1030						
3	SW-02											1100						
4	SW-03											1130						
5	SW-04											1200						
6																		

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Relinquished By:	Date: 5-3-24	Received By:	Verbal Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:	
Time: 13:17			All Results are emailed. Please provide Email address: dimitry@mchnabbpartners.com		
Relinquished By:	Date:	Received By:	REMARKS:		
Time:					
Delivered By: (Circle One)	Observed Temp. °C	Sample Condition	CHECKED BY: (Initials)	Turnaround Time: Standard <input checked="" type="checkbox"/> Rush <input type="checkbox"/>	Bacteria (only) Sample Condition
Sampler - UPS - Bus - Other:	Corrected Temp. °C	Cool Intact <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	SR	Thermometer ID #140	Cool Intact <input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> Yes <input type="checkbox"/> No		Correction Factor 0°C	Observed Temp. °C
					Corrected Temp. °C

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

May 20, 2024

ANDREW PARKER
MC NABB SERVICES
P. O. BOX 5753
HOBBS, NM 88240

RE: BELL LAKE #4 - 1

Enclosed are the results of analyses for samples received by the laboratory on 05/14/24 12:47.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-23-16. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

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

Celey D. Keene
Lab Director/Quality Manager



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

Analytical Results For:

MC NABB SERVICES
 ANDREW PARKER
 P. O. BOX 5753
 HOBBS NM, 88240
 Fax To: (575) 391-8484

Received:	05/14/2024	Sampling Date:	05/14/2024
Reported:	05/20/2024	Sampling Type:	Soil
Project Name:	BELL LAKE #4 - 1	Sampling Condition:	Cool & Intact
Project Number:	20230916-0830-BELLLAKE4	Sample Received By:	Shalyn Rodriguez
Project Location:	LEA CO., NM		

Sample ID: BACKFILL - 1 (H242628-01)

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/15/2024	ND	1.97	98.6	2.00	0.0453	
Toluene*	<0.050	0.050	05/15/2024	ND	1.99	99.6	2.00	0.648	
Ethylbenzene*	<0.050	0.050	05/15/2024	ND	1.97	98.3	2.00	1.03	
Total Xylenes*	<0.150	0.150	05/15/2024	ND	6.17	103	6.00	1.08	
Total BTEX	<0.300	0.300	05/15/2024	ND					

Surrogate: 4-Bromofluorobenzene (PID) 100 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	176	16.0	05/15/2024	ND	400	100	400	11.3	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/15/2024	ND	178	88.8	200	1.36	
DRO >C10-C28*	<10.0	10.0	05/15/2024	ND	183	91.3	200	1.25	
EXT DRO >C28-C36	<10.0	10.0	05/15/2024	ND					

Surrogate: 1-Chlorooctane 87.7 % 48.2-134

Surrogate: 1-Chlorooctadecane 89.8 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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Notes and Definitions

- QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
ND Analyte NOT DETECTED at or above the reporting limit
RPD Relative Percent Difference
** Samples not received at proper temperature of 6°C or below.
*** Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
Samples reported on an as received basis (wet) unless otherwise noted on report

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Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

Company Name: <i>McNabb Partners</i>		BILL TO		ANALYSIS REQUEST							
Project Manager: <i>Dimitry Nikolov</i>		P.O. #:									
Address:		Company: <i>McNabb</i>									
City: <i>Hobbs</i>	State: <i>NM</i>	Attn:									
Phone #: <i>917 497 6880</i>	Fax #:	Address:									
Project #:	Project Owner: <i>Kaiser-Franco's</i>	City:									
Project Name: <i>Bell Lake #4</i>		State: Zip:									
Project Location: <i>Lea Co, NM</i>		Phone #:									
Sampler Name: <i>Dimitry Nikolov</i>		Fax #:									

FOR LAB USE ONLY	Lab I.D.	Sample I.D.	G/G/RAB OR (C)OMP. # CONTAINERS	MATRIX						PRESERV.	SAMPLING	DATE	TIME	TPH	BTEX	Chloride
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:	ICE / COOL					
	<i>1042428</i>	<i>Backfill - 1</i>	<i>1</i>			<i>X</i>				<i>X</i>	<i>5/14</i>	<i>09:15</i>	<i>X</i>	<i>X</i>	<i>X</i>	

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Relinquished By: <i>[Signature]</i>	Date: <i>5/14/24</i>	Received By: <i>[Signature]</i>	Verbal Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
Time: <i>12:47</i>			All Results are emailed. Please provide Email address:	
Relinquished By:	Date:	Received By:	<i>on file.</i>	
Time:			REMARKS:	
Delivered By: (Circle One)	Observed Temp. °C <i>4.1</i>	Sample Condition	Turnaround Time: Standard <input checked="" type="checkbox"/> Rush <input type="checkbox"/>	Bacteria (only) Sample Condition
Sampler - UPS - Bus - Other:	Corrected Temp. °C	Cool Intact <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Thermometer ID #140	Cool Intact <input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Correction Factor 0°C	Observed Temp. °C
				Corrected Temp. °C

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

District I
 1625 N. French Dr., Hobbs, NM 88240
 Phone:(575) 393-6161 Fax:(575) 393-0720
District II
 811 S. First St., Artesia, NM 88210
 Phone:(575) 748-1283 Fax:(575) 748-9720
District III
 1000 Rio Brazos Rd., Aztec, NM 87410
 Phone:(505) 334-6178 Fax:(505) 334-6170
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 346675

QUESTIONS

Operator: KAISER-FRANCIS OIL CO PO Box 21468 Tulsa, OK 74121146	OGRID: 12361
	Action Number: 346675
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2326344306
Incident Name	NAPP2326344306 BELL LAKE UNIT #4 1 @ 30-025-08491
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Well	[30-025-08491] BELL LAKE UNIT 1 #004

Location of Release Source

Please answer all the questions in this group.

Site Name	BELL LAKE UNIT #4 1
Date Release Discovered	09/16/2023
Surface Owner	State

Incident Details

Please answer all the questions in this group.

Incident Type	Produced Water 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

Nature and Volume of Release

Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.

Crude Oil Released (bbls) Details	Cause: Equipment Failure Production Tank Crude Oil Released: 4 BBL Recovered: 4 BBL Lost: 0 BBL.
Produced Water Released (bbls) Details	Cause: Equipment Failure Production Tank Produced Water Released: 17 BBL Recovered: 14 BBL Lost: 3 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.

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QUESTIONS (continued)

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QUESTIONS

Nature and Volume of Release (continued)	
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	No
Reasons why this would be considered a submission for a notification of a major release	<i>Unavailable.</i>
<i>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.</i>	

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	<i>Not answered.</i>

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: Andrew Parker Title: Consultant Email: andrew@mcnabbpartners.com Date: 02/07/2024
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QUESTIONS (continued)

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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 75 and 100 (ft.)
What method was used to determine the depth to ground water	Attached Document
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Between 1000 (ft.) and ½ (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1000 (ft.) and ½ (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 1000 (ft.) and ½ (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Greater than 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan

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

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

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

Chloride (EPA 300.0 or SM4500 Cl B)	1680
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	22175
GRO+DRO (EPA SW-846 Method 8015M)	21550
BTEX (EPA SW-846 Method 8021B or 8260B)	204.1
Benzene (EPA SW-846 Method 8021B or 8260B)	11

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	05/03/2024
On what date will (or did) the final sampling or liner inspection occur	05/14/2024
On what date will (or was) the remediation complete(d)	05/14/2024
What is the estimated surface area (in square feet) that will be reclaimed	387
What is the estimated volume (in cubic yards) that will be reclaimed	48
What is the estimated surface area (in square feet) that will be remediated	387
What is the estimated volume (in cubic yards) that will be remediated	48

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 (continued)

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QUESTIONS

Remediation Plan (continued)

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

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

(Select all answers below that apply.)

(Ex Situ) Excavation and off-site disposal (i.e. dig and haul, hydrovac, etc.)	Yes
Which OCD approved facility will be used for off-site disposal	LEA LAND LANDFILL [fEEM0112342028]
OR which OCD approved well (API) will be used for off-site disposal	Not answered.
OR is the off-site disposal site, to be used, out-of-state	No
OR is the off-site disposal site, to be used, an NMED facility	No
(Ex Situ) Excavation and on-site remediation (i.e. On-Site Land Farms)	No
(In Situ) Soil Vapor Extraction	No
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	No
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	Yes
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	No
Ground Water Abatement pursuant to 19.15.30 NMAC	No
OTHER (Non-listed remedial process)	No

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

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

I hereby agree and sign off to the above statement	Name: Andrew Parker Title: Consultant Email: andrew@mcnabbpartners.com Date: 05/22/2024
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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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Action 346675

QUESTIONS (continued)

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	Action Number: 346675
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Deferral Requests Only

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.

Requesting a deferral of the remediation closure due date with the approval of this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Is the remaining contamination in areas immediately under or around production equipment where remediation could cause a major facility deconstruction	Yes
Please list or describe the production equipment and how (re)moving the equipment would cause major facility deconstruction	In use tank battery
What is the remaining surface area (in square feet) that will still need to be remediated if a deferral is granted	3431
What is the remaining volume (in cubic yards) that will still need to be remediated if a deferral is granted	1270
<i>Per Paragraph (2) of Subsection C of 19.15.29.12 NMAC if contamination is located in areas immediately under or around production equipment such as production tanks, wellheads and pipelines where remediation could cause a major facility deconstruction, the remediation, restoration and reclamation may be deferred with division written approval until the equipment is removed during other operations, or when the well or facility is plugged or abandoned, whichever comes first.</i>	
Enter the facility ID (##) on which this deferral should be granted	Not answered.
Enter the well API (30-) on which this deferral should be granted	30-025-08491 BELL LAKE UNIT 1 #004
Contamination does not cause an imminent risk to human health, the environment, or groundwater	True
<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: Andrew Parker Title: Consultant Email: andrew@mcnabbpartners.com Date: 02/07/2024

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QUESTIONS (continued)

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	Action Number: 346675
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	339022
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	05/03/2024
What was the (estimated) number of samples that were to be gathered	4
What was the sampling surface area in square feet	200

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	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No
All areas reasonably needed for production or subsequent drilling operations have been stabilized, returned to the sites existing grade, and have a soil cover that prevents ponding of water, minimizing dust and erosion	Yes
What was the total surface area (in square feet) remediated	387
What was the total volume (cubic yards) remediated	48
All areas not reasonably needed for production or subsequent drilling operations have been reclaimed to contain a minimum of four feet of non-waste contain earthen material with concentrations less than 600 mg/kg chlorides, 100 mg/kg TPH, 50 mg/kg BTEX, and 10 mg/kg Benzene	Yes
What was the total surface area (in square feet) reclaimed	387
What was the total volume (in cubic yards) reclaimed	48
Summarize any additional remediation activities not included by answers (above)	This submission is to update NMOCD regarding remediation activities completed outside of the tank battery, per approved remediation plan and deferral. It also describes an intervention with bioremediation to reduce the burden of hydrocarbon impact within the area of approved deferral. It is understood that the final remediation closure request will occur once the facility is decommissioned and the deferred area is completely remediated and reclaimed.

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

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

I hereby agree and sign off to the above statement	Name: Andrew Parker Title: Consultant Email: andrew@mcnabbpartners.com Date: 05/22/2024
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QUESTIONS (continued)

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QUESTIONS

Reclamation Report	
<i>Only answer the questions in this group if all reclamation steps have been completed.</i>	
Requesting a reclamation approval with this submission	No

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CONDITIONS

Action 346675

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	Action Number: 346675
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
nvelez	Deferral is approved. Remediation Due date will be left open until the site has been plugged and abandoned or a major facility deconstruction takes place.	6/13/2024